Final Environmental Impact Report

County of Ventura • Resource Management Agency • Planning Division
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American Jewish University – Camp Alonim Project

Case Number PL22-0032
State Clearinghouse No.: 2023110297

Project Location: 1101 Peppertree Lane, Brandeis, CA 93064

Project Description: The Project Applicant, American Jewish University, requests a Major Modification to Conditional Use Permit (CUP) No. 1776 to authorize further development of a camp. The Project includes approximately 41,000 square feet (sq. ft.) of structures including the following: (1) a welcome center; (2) 13 camper cabins; (3) three head counselor cabins; (4) an arts pavilion; (5) a 58-space parking lot; and (6) landscaping improvements. As part of the Project, the number of campers would increase by 100, from 472 to 572 campers. Additionally, the Applicant proposes to increase the frequency of events and number of attendees they may have on the Project Site. Six existing structures would be demolished, and 15 protected trees would be removed to accommodate the Project. The modified CUP would also formally authorize the water system serving the project, the Brandeis-Bardin Mutual Water Company has the necessary water capacity available to supply domestic and firefighting purposes, pursuant to Ventura County Waterworks Manual.

PREPARED FOR:
Ventura County Resource Management Agency

PREPARED BY:
CAJA Environmental Services, LLC

APPLICANT:
American Jewish University

April 2026

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1. INTRODUCTION

1.1 PURPOSE

The Ventura County Resource Management Agency (County), as the Lead Agency under the California Environmental Quality Act (CEQA), has prepared the Final Environmental Impact Report (Final EIR) for the proposed American Jewish University – Camp Alonim Project (Project). This document, in conjunction with the Draft Environmental Impact Report (Draft EIR), comprises the Final EIR.

As described in Sections 15088, 15089, 15090 and 15132 of the State CEQA Guidelines, the Lead Agency must evaluate comments received on the Draft EIR and prepare written responses and consider the information contained in a Final EIR before approving a project. Pursuant to State CEQA Guidelines 15132, a Final EIR consists of: (a) the Draft EIR or a revision of the Draft; (b) comments and recommendations received on the Draft EIR either verbatim or in summary; (c) a list of persons, organizations, and public agencies commenting on the Draft EIR; (d) the responses of the Lead Agency to significant environmental points raised in the review and consultation process; and (e) any other information added by the Lead Agency.

The Final EIR shall consist of:

(a) The Draft EIR or a revision of the Draft.

(b) Comments and recommendations received on the Revised Draft EIR either verbatim or in summary.

(c) A list of persons, organizations, and public agencies commenting on the Revised Draft EIR.

(d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process.

(e) Any other information added by the Lead Agency.

1.2 ORGANIZATION OF THE FINAL EIR

Pursuant to Section 15132 of the CEQA Guidelines, this document includes the following sections, which combined with the Draft EIR, constitutes the Final EIR for the Project:

Section 1. Introduction: This section provides an introduction to the Final EIR and the list of persons and agencies that submitted comments on the Draft EIR.

Section 2. Responses to Comments: This section includes responses to each of the significant environmental points raised in the comments submitted.

Section 3. Additions and Corrections to the Draft EIR: This section provides corrections and additions to the Draft EIR, based on and in response to comments received.

Section 4. Mitigation Monitoring Program: This section includes all of the Mitigation Measures that have been identified to reduce or avoid the Project's environmental impacts. This section also notes the monitoring phase, the enforcement phase, and the applicable department or agency responsible for ensuring that each mitigation measure is implemented.

Appendices: The appendices to this document include copies of all the comments received on the Draft EIR and additional information cited to support the responses to comments.

1.3 OVERVIEW OF THE CEQA PUBLIC REVIEW PROCESS FOR THE DRAFT EIR

In compliance with the State CEQA Guidelines, the County, as Lead Agency for the Project, has provided opportunities for the public to participate in the environmental review process. As described below, throughout the environmental review process, an effort was made to inform, contact, and solicit input from the public and various State, regional, and local government agencies and other interested parties on the Project.

(a) Notice of Preparation/Scoping Meeting

At the onset of the environmental review process and pursuant to the provisions of 15082 of the State CEQA Guidelines, the County circulated a Notice of Preparation (NOP) on November 20, 2023, for a 30-day review period, ending on December 20, 2023. The purpose of the NOP was to formally convey that the County was preparing a Draft EIR for the Project, and to solicit input regarding the scope and content of the environmental information to be included in the Draft EIR. The NOP is included as Appendix A-1 to the Draft EIR.

A public scoping meeting was held via the Zoom platform on December 5, 2023, from 6:00 pm to 8:00 pm, to inform the public and interested parties about the Project and solicit comments on the scope of environmental issues, mitigation measures, and range of reasonable alternatives to be addressed in the EIR.

Public comments received during the NOP circulation period are provided in Appendix A-2 to the Draft EIR.

(b) Draft Environmental Impact Report

In accordance with the provisions of Sections 15085(a) and 15087(a)(1) of the State CEQA Guidelines, the County, serving as Lead Agency: (1) posted a Notice of Availability and Notice of

Completion of the Draft EIR with the Ventura County Clerk, indicating that the Draft EIR was available for review; (2) posted the Draft EIR on the County's website (rma.venturacounty.gov/planning); (3) prepared and transmitted a Notice of Completion (NOC) and an electronic copy of the Draft EIR to the California Governor's Office of Land Use and Climate Innovation (formerly the State Clearinghouse); (4) sent a notice to all property owners and occupants within 300 feet of the Project Site; and (5) sent a notice to the last known names and addresses of all organizations and individuals who previously requested such notice in writing or attended public meetings about the Project. The public review period for the Draft EIR commenced on December 18, 2025, and ended on February 2, 2026.

Comments received during and after the public review period are presented and responded to in Section 2, Responses to Comments, of the Final EIR. The Draft EIR and this Final EIR will be submitted to the County decision-makers for certification in connection with action on the Project.

1.4 REVIEW AND CERTIFICATION OF THE FINAL EIR

Consistent with State law (Public Resources Code 21092.5), responses to agency comments are being provided to each commenting agency more than 10 days prior to certification of the EIR.

The Final EIR is available for public review at the following locations:

Michael Conger
County of Ventura, Resource Management Agency
800 South Victoria Avenue
Ventura, California 93009
Email: Michael.Conger@venturacounty.gov

The Final EIR is also available online at rma.venturacounty.gov/planning

1.5 LIST OF COMMENTERS ON THE DRAFT EIR

The County received a total of 13 comment letters on the Draft EIR. Each comment letter has been assigned a corresponding number, and distinct comments within each comment letter are also numbered. Comment letters from public agencies are denoted with the prefix "A", while comment letters from private individuals are denoted with the prefix "B". Each comment letter has been divided into individual comments, which are numbered "1-1", "2-1", "3-1", etc., with the first number indicating the comment letter number and the second number indicating the individual comment number within that letter.

The agencies and persons listed below provided written comments on the Draft EIR to the County either during or shortly following the close of the formal public review period, which was from December 18, 2025, to February 2, 2026. Copies of the comments are included in Appendix A to this Final EIR.

1.5.1.1 Public Agencies

A1. California Department of Fish and Wildlife

A2. Ventura County Air Pollution Control District

A3. Ventura County Environmental Health Division

A4. Ventura County Fire Department

A5. Ventura County Public Works Agency

A6. Ventura County Public Works Agency, Groundwater Resources Section

A7. Ventura County Public Works Agency, Watershed Protection

A8. Los Angeles Regional Water Quality Control Board

A9. Ventura County Fire Department (2)

A10. California Department of Conservation, Geologic Energy Management Division

1.5.1.2 Private Individuals

B1. Charles Lange

B2. Ashley Holmes

B3. Paul Kuenstner (Enso Verde)

2. RESPONSES TO COMMENTS

2.1 INTRODUCTION

Sections 21091(d) and 21092.5 of the Public Resources Code (PRC) and CEQA Guidelines Section 15088 govern the lead agency's responses to comments on a Draft EIR. Section 15088(a) of the CEQA Guidelines states that "[T]he lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response. The Lead Agency shall respond to comments that were received during the noticed comment period and any extensions and may respond to late comments." In accordance with these requirements, this Section of this Final EIR provides responses to each of the written comments on the Draft EIR received during the public comment period.

Section 2, Responses to Comments, presents comments submitted during the public comment period for the Draft EIR from State, regional, and local government agencies, as well as from individuals and organizations. The County received a total of 13 comment letters on the Draft EIR. Each comment letter has been assigned a corresponding number, and distinct comments within each comment letter are also numbered. Each comment letter has been divided into individual comments, which are numbered "1-1", "2-1", "3-1", etc., with the first number indicating the comment letter number and the second number indicating the individual comment number within that letter.

As required by the CEQA Guidelines, Section 15088(c), the focus of the responses to comments is on the "disposition of significant environmental issues raised." Therefore, detailed responses are not provided to comments that do not relate to environmental issues.

Note that there may be spelling and/or grammar errors in the Comment Letters. These are replicated here exactly as they were delivered to the County.

LETTER NO. A1

Department of Fish and Wildlife
Victoria Tang, Environmental Program Manager
South Coast Region
3883 Ruffin Road
San Diego, CA 92123
WWW.WILDLIFE.CA.GOV

January 28, 2026

Comment No. A1-1

The California Department of Fish and Wildlife (CDFW) reviewed the Draft Environmental Impact Report (DEIR) from the County of Ventura (County) for the American Jewish University – Camp Alonim Project (Project) pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines[1].

Thank you for the opportunity to provide comments and recommendations regarding Project activities that may affect California fish and wildlife. Likewise, CDFW appreciates the opportunity to comment on 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.

Response to Comment No. A1-1

The comment provides general introductory information, which is acknowledged for the record, and which will be forwarded to the decision-making bodies for their review and consideration.

Comment No. A1-2

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

[1] 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.

specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

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[2] 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.

Response to Comment No. A1-2

The comment provides general information about CDFW's authority, which is acknowledged for the record, and which will be forwarded to the decision-making bodies for their review and consideration.

Comment No. A1-3

PROJECT DESCRIPTION SUMMARY

Proponent: John Friedman, American Jewish University

Objective: The Project proponent requests a major modification to Conditional Use Permit No. 1776 for the development of additional facilities at Camp Alonim. Proposed facilities include a welcome center, 13 camper cabins, three 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 the new development, six existing structures would be demolished. Lastly, the Project would require the removal of 15 protected trees on site.

Location: The 2,588-acre Project site 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, 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

[2] "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."

south and residential communities to the north. South of the proposed parking lot is an ephemeral stream that feeds into East Tributary Meier Canyon, which flows into channelized Arroyo Simi. East of the proposed parking lot is the upstream portion of the ephemeral stream that is fed from drainages in the adjacent Simi Hills.

Response to Comment No. A1-3

The comment reiterates information about the Project description and Project Site setting, which are acknowledged for the record.

Comment No. A1-4

Survey Area 1 (Project site with a 100-foot Fuel Modification Zone and an additional 300-ft buffer) was surveyed in February 2022. Survey Area 2 (SA2) includes the proposed cabin area, welcome center, parking lot, and a stretch of the ephemeral stream. SA2 was surveyed in April, May, and July 2022. A bat assessment survey was conducted in March 2024 within and adjacent to SA2. According to the DEIR, no other focused surveys have been conducted for any other special status species within the Project site. Sensitive vegetation communities observed within the Project site include: *Platanus Racemosa*/*Quercus agrifolia* South Coast Woodland/Forest Association (State Rank (S) 3; 3.85 acres total; 1.35 acres impacted), *Quercus agrifolia*/*Quercus berberidifolia* Woodland/Forest Association (S3; 0.39 acre total; 0.39 acre impacted), California sagebrush - purple sage shrubland Association (S4; 0.49 acre total; no impacts), scrub oak shrubland Association (S4; 0.35 acre total; no impacts), California sagebrush shrubland Association (S4; 0.26 acre total; 0.26 acre impacted), and purple sage shrubland Association (S4; 0.09 acre total; 0.03 acre impacted).

Sensitive species that are of potential concern include, but are not limited to, Crotch's bumble bee (*Bombus crotchii*; CESA candidate endangered), California legless lizard (*Anniella stebbinsi*; California Species of Special Concern (SSC)), coastal whiptail (*Aspidoscelis tigris stejnegerf*, SSC), coast horned lizard (*Phrynosoma blainvillii*; SSC), western yellow bat (*Lasiurus xanthinus*; SSC), and pallid bat (*Antrozous pallidus'*, SSC).

The DEIR proposes mitigation measures regarding protection and restoration of Catalina mariposa lily (*Calochortus catalinae*); fuel modification plan; monarch butterfly habitat assessment, protocol surveys, and take avoidance; native milkweed planting; prohibition on non-native milkweed; Crotch's bumble bee habitat assessment, protocol surveys, and take avoidance; nighttime and acoustic bat surveys; bat avoidance and protection plan; minimization of night lighting for bat habitat; nesting bird avoidance, survey, and protection plan; special status reptile avoidance, protection, and relocation plan; pre-construction survey and site clearance; biological monitoring; focused surveys for special status wildlife; special status species avoidance and protection; contractor education; development and implementation of a habitat restoration and/or replacement plan; best management practices; low impact lighting plan; protected tree mitigation and protection plan; and tree health monitoring and reporting.

Response to Comment No. A1-4

The comment provides a summary of the analysis of biological resources contained in the Draft EIR, but does not state a specific concern or question regarding the adequacy of the analysis of environmental impacts. Nevertheless, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. A1-5

Project History: CDFW previously commented on the Notice of Preparation in December 2023. Comments consisted of local wildlife movement, Crotch's bumble bee, oak trees, bat species, wetlands, streams and riparian areas, facility sites, lighting design, and nesting birds and raptors.

Response to Comment No. A1-5

CDFW's comment letter in response to the NOP was received and included in Appendix A-2 of the Draft EIR.

Comment No. A1-6

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 are also included to improve the document.

Response to Comment No. A1-6

Responses to the individual comments and recommendations provided by CDFW are provided below.

Comment No. A1-7

COMMENT # 1: Impacts to Crotch's Bumble Bee

Issue: Project activities (i.e. vegetation removal and ground disturbance) could adversely impact Crotch's bumble bee. The DEIR does not include survey results for the presence or absence of Crotch's bumble bee.

Specific impact: Mitigation measure BIO 7 may be improved to ensure impacts to Crotch's bumble bee are appropriately mitigated. Mitigation measure BIO 7 does not specify avoidance protocols if the species is detected and instead deferred to consulting with CDFW. This may result in missed observations of the species and adverse impacts at the time of construction.

Why impact would occur: The DEIR states that the Project site contains potential nesting and foraging habitat for Crotch's bumble bee. These results are based on a biological reconnaissance assessment, which do not equate to actual surveys for the presence or absence of Crotch's bumble bee. Crotch's bumble bee primarily nest in late February through late October underground in abandoned small mammal burrows but may also nest under perennial bunch grasses or thatched annual grasses, under-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 mated queens include soft, disturbed soil (Goulson 2010), or under leaf litter or other debris (Williams et al. 2014).

CDFW appreciates the incorporation of MM BIO-7 to include pre-construction surveys for Crotch's bumble bee. As currently written, avoidance measures, such as specific buffer distances or a halt in construction if the species is detected, are not included and state that CDFW shall be consulted if detected. The lack of specification and relying on consultation with CDFW at the time of detection may not adequately reduce adverse impact to the species and would be considered deferred mitigation. Additionally, the measure does not include a discussion regarding obtaining an Incidental Take Permit (ITP) in the event Crotch's bumble bee is found within the Project site. This may result in impacts to Crotch's bumble bee occurring without appropriate take authorization under CESA. Moreover, this does not address impacts to floral resources. Crotch's bumble bee can be adversely impacted when their floral resources are removed. Ground disturbance and vegetation removal associated with Project implementation during the breeding season could result in the incidental loss of breeding success or otherwise lead to nest abandonment in areas adjacent to the Project site. Without sufficient avoidance, minimization, or mitigation measures, the Project may result in undisclosed and unmitigated temporal or permanent loss of colonies, and suitable nesting and foraging habitat.

Evidence impact may be significant: 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. 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). CDFW considers impacts to species that are candidates for CESA listing to be significant, under CEQA. Accordingly, the Project may have a substantial adverse 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 the CDFW or the United States Fish and Wildlife Service (USFWS).

CEQA Guidelines §15070 and §15071 require the document to analyze if the Project may have a significant effect on the environment as well as review if the Project will 'avoid the effect or mitigate to a point where clearly no significant effects would occur'. Relying on future surveys, the preparation of future management plans, or mitigating by obtaining permits from CDFW, are considered deferred mitigation under CEQA. In order to analyze if a project may have a significant effect on the environment, the project related impacts, including survey results for

species that occur in the entire project footprint need to be disclosed during the public comment period. This information is necessary to allow CDFW to comment on alternatives to avoid impacts, as well as to assess the significance of the specific impact relative to the species (e.g., current range, distribution, population trends, and connectivity).

Response to Comment No. A1-7

The County disagrees with the comment's suggestion that impacts to Crotch's bumble bee cannot be adequately assessed unless protocol level surveys are completed prior to preparation of the Draft EIR and must be disclosed during the public comment period for the Draft EIR. As is thoroughly discussed and analyzed in the Draft EIR (including in Draft EIR Section IV.E, Biological Resources, and in the technical reports contained in Appendix C of the Draft EIR), it is understood that the Project Site includes potentially suitable Crotch's bumble bee habitat that may be impacted and that, if the species is present, such an impact would be potentially significant and therefore require mitigation. It is for that reason that Mitigation Measure BIO-7 was included.

The County also disagrees with the comment's suggestion that reliance on future consultation with CDFW regarding the specific take avoidance measures that will be implemented if Crotch's bumble bees are found to be present is deficient and constitutes deferred mitigation. The commenter states that failure to include specifics regarding take avoidance measures that will be implemented could somehow lead to missed observations of the species and adverse impacts at the time of construction. The comment, however, fails to provide any discussion as to how the inclusion of specific take avoidance measures makes observation of species more likely or why it lessens impacts during construction, and the County is not aware of any justification for this position. Mitigation Measure BIO-7 requires pre-construction protocol level surveys if suitable habitat is present, ensuring that observations will be made. This measure also requires implementation of avoidance measures such as buffers and/or ongoing monitoring which will ensure that the impacts are minimized. The County has determined, as it has with many other projects, that these measures are sufficient to reduce the potentially significant impact to a less than significant level. However, as is discussed in Response to Comment No. A1-8, the County will add additional language to Mitigation Measure BIO-7 to further refine and clarify the requisite mitigation.

Comment No. A1-8

Recommended Potentially Feasible Mitigation Measure(s)

CDFW requests the following recommendations and mitigation measures are incorporated into the final CEQA document:

Mitigation Measure #1: Mitigation Measure BIO-7 Crotch's Bumble Bee Habitat Assessment, Protocol Surveys, and Take Avoidance - CDFW recommends the County

revise Mitigation Measure BIO-7 to incorporate the underlined language and remove the language in strikethrough:

A County-approved qualified biologist shall conduct a habitat assessment survey within one year prior to the start of vegetation removal and/or ground-disturbing activities to determine if the Project Construction Footprint contains habitat suitable to support Crotch's bumble bees. If suitable habitat is present, the qualified biologist shall assess presence of foraging and nesting Crotch's bumble bees by conducting focused protocol surveys consistent with CDFW's ~~the~~ Survey Considerations for California Endangered Species Act Candidate Bumble Bee Species. Focused surveys shall also be conducted throughout the entire Project area and during the appropriate flying season (April to August) to ensure no missed detection of Crotch's bumble bee occurs. Surveys for Crotch's bumble bee shall be conducted every year that Project activities will occur, as bumble bees are known to move their nests each year. The pre-construction surveys shall be conducted prior to ground-disturbing activities. ~~If Crotch's bumble bees are documented using areas within the Project Construction Footprint for foraging, nesting, and/or overwintering, Project proponent shall consult CDFW for recommended take avoidance measures, which may include buffer zones to avoid disturbing any nests and/or on-going biological monitoring during vegetation removal, prior to the start of ground disturbing activities.~~

If Crotch's bumble bees are not detected during the pre-construction surveys but suitable habitat is present, a qualified biologist shall be present during ground-disturbing project activities that occur during the Crotch's bumble bee colony active period, to ensure that no impacts occur to a previously unidentified Crotch's bumble bee nest. No additional work restrictions with regard to Crotch's bumble bee shall be implemented for the remainder of the colony active period. If Crotch's bumble bees are detected, ground-disturbing activities shall be prohibited within 100 feet of any known, occupied Crotch's bumble bee nest, or as determined by the qualified biologist, who shall demarcate the 100- foot buffer via flagging. If any individual Crotch's bumble bee or a Crotch's bumble bee nest is found on a project site, the applicant will obtain an Incidental Take Permit from CDFW for impacts to this species. Work shall not resume in this area for the duration of the Crotch's bumble bee colony active period, unless concurrence from CDFW has been granted.

Response to Comment No. A1-8

The County appreciates CDFW's suggested refinements to Mitigation Measure BIO-7 and will incorporate the proposed changes with minor modifications. In the County's experience, the size of the buffer required to avoid take can vary based on the specific habitat and the need for an incidental take permit if a nest is found will depend on the location of the nest and the disturbance areas. The revised mitigation measure will ensure that adequate measures are incorporated while also allowing reasonable flexibility. The following changes have been incorporated into Mitigation Measure BIO-7 (see also Section 3, Additions and Corrections of this Final EIR), to address the concerns identified in this comment (changes to the comment's proposed language are shown in bold):

A County-approved qualified biologist shall conduct a habitat assessment survey within one year prior to the start of vegetation removal and/or ground-disturbing activities to determine if the Project Construction Footprint contains habitat suitable to support Crotch's bumble bees. If suitable habitat is present, the qualified biologist shall assess presence of foraging and nesting Crotch's bumble bees by conducting focused protocol surveys consistent with CDFW's ~~the~~ Survey Considerations for California Endangered Species Act Candidate Bumble Bee Species. Focused surveys shall also be conducted throughout the entire Project area and during the appropriate flying season (April to August) to ensure no missed detection of Crotch's bumble bee occurs. Surveys for Crotch's bumble bee shall be conducted every year that Project activities will occur, as bumble bees are known to move their nests each year. The pre-construction surveys shall be conducted prior to ground-disturbing activities. ~~If Crotch's bumble bees are documented using areas within the Project Construction Footprint for foraging, nesting, and/or overwintering, Project proponent shall consult CDFW for recommended take avoidance measures, which may include buffer zones to avoid disturbing any nests and/or on-going biological monitoring during vegetation removal, prior to the start of ground disturbing activities.~~

If Crotch's bumble bees are not detected during the pre-construction surveys but suitable habitat is present, a qualified biologist shall be present during ground-disturbing project activities that occur during the Crotch's bumble bee colony active period, to ensure that no impacts occur to a previously unidentified Crotch's bumble bee nest. No additional work restrictions with regard to Crotch's bumble bee shall be implemented for the remainder of the colony active period. If Crotch's bumble bees are detected, ground-disturbing activities shall be prohibited within 100 feet of any known, occupied Crotch's bumble bee nest, or as determined by the qualified biologist **with approval of CDFW**, who shall demarcate the ~~**100- foot**~~ **approved** buffer via flagging. If any individual Crotch's bumble bee or a Crotch's bumble bee nest **that cannot be avoided** is found on a project site, the applicant will obtain an Incidental Take Permit from CDFW for impacts to this species. Work shall not resume in this area for the duration of the Crotch's bumble bee colony active period, unless concurrence from CDFW has been granted.

Comment No. A1-9

Mitigation Measure #2: No Net Loss - If the California Fish and Game Commission does not list Crotch's bumble bee under CESA, it will still remain an invertebrate of conservation priority under the California Terrestrial and Vernal Pool Invertebrates of Conservation Priority. Thus, there shall be no net loss of suitable habitat for Crotch's bumble bee. The County shall offset impacts on habitat for Crotch's bumble bee at no less than 2:1, so there is no net loss of suitable habitat.

Response to Comment No. A1-9

The comment requests that compensatory mitigation to achieve no net loss of Crotch's bumble bee habitat be incorporated into the Draft EIR. However, to date, no Crotch's bumble bees have been detected within the Project area, and the Project has incorporated mitigation to avoid and minimize impacts to Crotch's bumble bee should they be found to be present (see Mitigation Measure BIO-7). These measures are sufficient to address impacts to potential Crotch's bumble bee habitat and to avoid any significant impact to this species.

Comment No. A1-10

Recommendation #1: CEQA - CDFW's issuance of an ITP for a Project is subject to CEQA. As a Responsible Agency, CDFW may consider the CEQA document from the lead agency/Project proponent for the Project. However, additional documentation may be required as part of an ITP application for the Project in order for CDFW to adequately develop an accurate take analysis and identify measures that would fully mitigate for take of CESA-listed species. To minimize additional requirements by CDFW pursuant to Fish and Game Code section 2081 and/or under CEQA, a project's CEQA document should fully identify the potential impacts to Crotch's bumble bee and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the ITP.

Response to Comment No. A1-10

The County recognizes that CDFW is responsible for issuing ITPs and that issuance of an ITP would be subject to CEQA. The County believes that the analysis included in the Final EIR, which includes the analysis provided in the Draft EIR, is sufficient to support any action that CDFW needs to take in response to an application for an ITP under Fish and Game Code Section 2081.

Comment No. A1-11

Recommendation #2: Updated Biological Assessment Surveys - 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 three years. CDFW strongly recommends the County retain a qualified biologist to perform an updated biological survey to account for the current state of the Project site and the inventory of biological species that may be present. The survey should be conducted at the appropriate time of year and time of day when sensitive species are active or otherwise identifiable for both wildlife and plants. Based on the survey results, the final CEQA document should propose avoidance and specific mitigation for Project impacts to special-status species. Findings from the updated general field surveys should be disclosed in the CEQA document for public review.

Response to Comment No. A1-11

The County disagrees that the surveys relied on to analyze the impacts to special status species are inadequate given that they were done more than a year ago. The Draft EIR relies on surveys conducted by qualified biologists completed at the time of the Project application. While these surveys are more than a year old, they provide the information necessary to conduct a valid, reasoned, and sufficient analysis of potential impacts to all special status species. The comment does not provide evidence of any changed circumstances (such as changes in site conditions, severe weather events, or significant changes in habitat vegetation) that significantly altered the conditions within the Project area since the surveys were completed. Neither the use of the Project Site, nor the surrounding uses, have changed and there have not been any new species documented in the area that were not included in the biological assessment completed for the Project. Further, such surveys are not necessary to avoid significant impacts to special status species as the Draft EIR requires pre-construction surveys, ensuring that all special status species present on the Project Site at that the time of ground disturbance will be addressed in a manner that is consistent with all federal, state and County requirements. (Pre-construction surveys are required as part of Mitigation Measures BIO-1, BIO-2, BIO-7, BIO-10, BIO-14, and BIO-17).

Comment No. A1-12

COMMENT # 2: Impacts to Streams

Issue: The Project may indirectly impact riparian vegetation associated with the ephemeral stream on site.

Specific impact: Project activities (i.e. grading and ground disturbance) may cause indirect impacts, such as sedimentation and erosion, to the ephemeral stream and associated species. Based on the DEIR, it is unclear that CDFW will be notified for a Lake and Streambed Alteration (LSA) Agreement for Project activities occurring on site.

Why impact would occur: Project construction and activities occurring adjacent to and within the 100-foot buffer of the stream could impact it and associated riparian vegetation. The DEIR claims that approximately 3.85 acres of streambed and California Sycamore-Coast Live Oak South Coast Woodland may be considered riparian and under the authority of CDFW. Moreover, approximately 0.26 acres, potentially under the authority of CDFW, may be impacted by Project activities. While the DEIR outlines when permit triggers for an LSA Agreement, there is no specific language that a notification will be submitted for Project activities.

Evidence impact would 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.

Response to Comment No. A1-12

The County agrees with the commenter that the Project is required to provide CDFW notification under California Fish and Game Code Section 1602 if there are impacts to areas subject to CDFW's jurisdiction. The Draft EIR acknowledges the same in Section IV.E, Biological Resources (see page IV.E 8).

Comment No. A1-13

Recommended Potentially Feasible Mitigation Measure(s)

CDFW requests the following recommendations and mitigation measures are incorporated into the final CEQA document:

Mitigation Measure #3: Lake and Streambed Alteration Agreement - CDFW has regulatory authority over activities in streams that will divert or obstruct the natural flow, or change the bed, channel, or bank (which may include associated riparian resources) of any river, stream, or lake or use material from a river, stream, or lake. For any such activities, the Project proponent 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 an LSA Agreement with the applicant is required prior to conducting the proposed activities. 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. A notification package for a LSA Agreement may be obtained by accessing CDFW's Lake and Streambed Alteration Program[3] website.

Response to Comment No. A1-13

The comment provides information about CDFW's authority over lake and streambed alteration, but does not state a specific concern or question regarding the adequacy of the analysis of

[3] https://wildlife.ca.gov/Conservation/Environmental-Review/LSA

environmental impacts contained in the Draft EIR. The Project is required to comply with all laws and regulations, including Section 1602 of the California Fish and Game Code.

Comment No. A1-14

Recommendation #3: 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 DEIR 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 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.

Response to Comment No. A1-14

The County agrees that issuance of a LSA Agreement is subject to CEQA and believes that the Final EIR (including the analysis provided in the Draft EIR) contains the necessary analysis on which CDFW can rely to take such an action. See also Response to Comment No. A1-13.

Comment No. A1-15

COMMENT # 3: Impacts to Bats

Issue: The mitigation measure for bats may be improved to ensure adequate surveys occur prior to the start of construction to reduce potential adverse impacts.

Specific impact: Potential direct impacts include Project construction on structures or trees that may provide roosting habitat and therefore has the potential for the direct loss of bats. Indirect impacts to bats and roosts could result from increased noise disturbances, human activity, dust, vegetation clearing, ground disturbing activities (e.g., staging, access, excavation, grading), and vibrations caused by heavy equipment. Demolition and grading activities may impact bats potentially using man-made structures or surrounding trees as roost sites.

Why impact would occur: The DEIR states that there are potential direct Project impacts resulting in the demolition of existing buildings and/or removal of mature trees. The Project site contains suitable habitat for several bat species that have the potential to occur on the Project site including western yellow bat and pallid bat. MM-BIO-9 does not specifically call for

construction to be halted if the species is detected during preconstruction surveys, which means that impacts to bats may occur without appropriate take authorization. Moreover, the mitigation measure does not provide specific compensatory mitigation to offset the permanent loss of confirmed roosting sites for bats. Without replacement of habitat, the Project would contribute to the ongoing loss of suitable habitat on a local and regional scale.

Evidence impact would be significant: Bats are considered non-game mammals and are protected by state law from take and/or harassment (Fish and Game Code § 4150, CCR § 251.1). Several bat species are also considered Species of Special Concern, which meet the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines §15065). CDFW considers adverse impacts to a SSC, for the purposes of CEQA, to be significant without mitigation. Mitigation is not just exclusion from maternity roosts, wintering sites, night roosts, mating roosts and foraging sites, but providing similarly functioning habitat to what is impacted.

Response to Comment No. A1-15

As is thoroughly discussed in the Draft EIR (see Section IV.E, Biological Resources, and the Bat Habitat Assessment contained in Appendix C-6 to the Draft EIR), the County recognizes that the Project will impact habitat which is suitable for several bat species. Consistent with the approach suggested by commenter, the County has required under Mitigation Measures BIO-8 and BIO-9 that preconstruction surveys be conducted, and under Mitigation Measure BIO-10, that the Project submit a Bat Avoidance and Protection Plan prepared by a qualified biologist that specifies the take avoidance measures that will be implemented and the habitat compensation that will be provided if bats are present. Mitigation Measures BIO-9 address acoustic surveys, while Mitigation Measure BIO-10 addresses specific actions that will be implemented to avoid take, such as the halting of construction if a bat is detected. Under Mitigation Measure BIO-10, the BAPP must include measures to remove and/or exclude bats from impacted areas which necessarily include halting of construction. Additionally, Mitigation Measure BIO-10, requires that the BAPP describe the mitigation that will be provided to compensate for lost roosting habitat and that the compensation is sufficient to offset the loss. As is discussed in the Responses to Comment Nos. A1-17 and A1-18, additional language has been added to Mitigation Measure BIO-10 to clarify the scope of the requisite mitigation.

Comment No. A1-16

Recommended Potentially Feasible Mitigation Measure(s)

CDFW requests the following recommendations and mitigation measures are incorporated into the final CEQA document:

Mitigation Measure #4: Mitigation Measure BIO-8 Nighttime Bat Surveys – The County should revise Mitigation Measure BIO-8 to incorporate the underlined language and omit language in strikethrough:

A qualified bat specialist, with the appropriate handling permits and approved by the County, shall conduct a nighttime survey to identify bat species, habitat usage, and roost locations within or adjacent to the Project Construction Footprint. The nighttime emergence survey should occur on a warm, dry night, when predicted nighttime lows are not less than 45°F. The survey shall begin 30 minutes prior to the time of sunset and continue until one hour after sunset. During the nighttime survey, the bat biologist shall inspect each tree in and within a 100-foot buffer of the Development Footprint. All trees shall be examined and categorized on the basis of their suitability as day or maternity roosting habitat. Depending on the locations of roosts and number of roost exits, multiple surveyors may be required. The bat biologist and team of surveyors shall conduct acoustic surveys, aided by acoustic recognition technology (e.g., AnaBat or similar) during the nighttime survey. The length and extent of acoustic surveying depends on the time of year and target species. Acoustic monitoring nighttime surveys should be conducted for at least 3 nights in the summer and up to 10 nights in the winter to confirm absence. Visual surveys shall be conducted at the time of emergence with high quality night vision goggles (Generation 3+) and bat detectors. Several surveyors at multiple vantage points may be required to ensure adequate visual coverage, especially around large trees. Surveyors shall station themselves such that roost exit points are backlit with the sky and that their survey areas do not overlap. The visual survey shall start at sunset and continue for at least 75 minutes, as roosting bats do not all emerge simultaneously.

The bat biologist conducting nighttime surveys shall provide to the County and CDFW a report of survey results, including any species detected and a map of identified roost sites. Nighttime surveys shall be timed to allow species identification and the development of an appropriate Bat Avoidance and Protection Plan (BAPP), provided for formally in MM-BIO-10, below.

Response to Comment No. A1-16

The County appreciates the commenter's concern that any person who could handle a bat must hold appropriate handling permits. However, the County disagrees with the assumption that only those who hold handling permits can complete surveys as it is usually not necessary to handle a bat during surveys. Further, such permits are legally required and therefore, a specific mitigation measure is not needed to ensure that those handling bats as part of survey or mitigation efforts hold requisite permits. While the County does not believe it is necessary to reduce the impact to a less than significant level, the following language has been added to end of Mitigation Measure BIO-8 in the FEIR to address this concern: Only qualified bat specialists with appropriate handling permits will be permitted to handle bats. (See also Section 3, Additions and Corrections, of this Final EIR, for the updated language.)

Comment No. A1-17

Mitigation Measure #5: Mitigation Measure BIO-9 Acoustic Bat Surveys – The County should revise Mitigation Measure BIO-9 to incorporate the underlined language and omit language in strikethrough:

To confirm the presence of bats and identify species, passive acoustic detectors shall be deployed within the Project Construction Footprint for at least seven nights. The qualified bat biologist shall determine if acoustic data suggest a pattern of bats leaving at the expected emergence time and returning at dawn. Number of acoustic calls recorded during ten-minute intervals in the first 75 minutes after sunset shall be analyzed to determine if monitored trees or structures likely support a bat roost. A visual emergence survey, as described above, shall be conducted to confirm if potential roost structures are used by bats. If presence of individual bats is confirmed, the bat biologist shall halt Project activities until it has been determined that all individual bats have left the Project site and Project activities may resume.

The bat biologist conducting acoustic surveys shall provide to the County and CDFW a report of survey results, including any species detected and a map of identified roost sites. Acoustic surveys should be timed to allow species identification and the development of an appropriate BAPP.

Response to Comment No. A1-17

As is discussed in Response to Comment No. A1-15, the County agrees with the commenter that in the event a bat is present in an area that could be impacted, construction must halt until the bat(s) has/have been documented as leaving the site and such measures need to be included in the BAPP prepared under Mitigation Measure BIO-10. While the specific language proposed is not necessary to reduce any potentially significant impact to a less than significant level, the County has no objection to adding this additional language, and such language has been incorporated into Mitigation Measure BIO-10. (See also Section 3, Additions and Corrections, of this Final EIR, for the updated language.)

Comment No. A1-18

Mitigation Measure #6: Mitigation Measure BIO-10 Bat Avoidance and Protection Plan – The County should revise Mitigation Measure BIO-10 to incorporate the underlined language and omit language in strikethrough:

If the visual and acoustic surveys (described in Mitigation Measures MM-BIO-8 and MM-BIO-9) are positive for the presence of bats, the bat biologist shall prepare a Bat Avoidance and Protection Plan (BAPP). Depending on the bat species present and roost locations, the plan may include the following elements:

- Required pre-construction surveys and monitoring
- Timing considerations for temporal avoidance (e.g., outside of the maternity season, May 1 - August 15, if the project may potentially impact a maternity roost or non-flying juvenile bats)
- Humane relocation and exclusion methods to remove and/or exclude bats from roosting sites within structures or vegetation slated for removal
- Protective fencing or signage to avoid impacts to potential roosting habitat that shall remain on site

- Best Management Practices for minimizing the effects of noise, human activity, dust, lighting, and ground vibrations on bats
- On and/or off-site mitigation measures to compensate for lost roosting habitat, including installation of alternative roosting habitat
- Mitigation monitoring to evaluate the effectiveness of bat-related mitigation

The County shall review the BAPP and ensure that all applicable mitigation measures are implemented prior to, during, and post-completion of Project activities, as required. If the installation of alternative habitat is required to offset the loss of roosting sites, a qualified biologist shall monitor the alternative habitat for the duration recommended in the BAPP.

Response to Comment No. A1-18

The commenter did not propose any additional language be added to Mitigation Measures BIO-10 and instead just presented a portion of the language already included in this measure. However, in order to address the issues raised in Comment Nos. A1-17 and A1-19, Mitigation Measure BIO-10 has been modified as follows (changes in **bold)**:

Requirement: If the visual and acoustic surveys (described in Mitigation Measures MM-BIO-8 and MM-BIO-9) are positive for the presence of bats, the bat biologist shall prepare a Bat Avoidance and Protection Plan (BAPP). Depending on the bat species present and roost locations, the plan may include the following elements:

- Required pre-construction surveys and monitoring
- Timing considerations for temporal avoidance (e.g., outside of the maternity season, May 1 - August 15, if the project may potentially impact a maternity roost or non-flying juvenile bats)
- Humane relocation and exclusion methods to remove and/or exclude bats from roosting sites within structures or vegetation slated for removal
- **If bats are found to be present during construction, all construction activities will be halted until the County approved biologists determines that all bats have left the construction site and that Project activities may be resumed**
- Protective fencing or signage to avoid impacts to potential roosting habitat that shall remain on site
- Best Management Practices for minimizing the effects of noise, human activity, dust, lighting, and ground vibrations on bats
- On and/or off-site mitigation measures to compensate for lost roosting habitat, including installation of alternative roosting habitat **sufficient to ensure a no net loss of habitat and/or roosting sites**
- Mitigation monitoring to evaluate the effectiveness of bat-related mitigation

Documentation: Preparation of the BAPP by a County-approved biologist.

Timing: The BAPP shall be submitted to the Planning Division prior to the issuance of a grading permit. The measures identified in the BAPP shall be implemented in accordance with the timeframes identified in the BAPP.

Monitoring and Reporting: The County shall review the BAPP and ensure that all applicable mitigation measures are implemented prior to, during, and post-completion of Project activities, as required. If the installation of alternative habitat is required to offset the loss of roosting sites, a qualified biologist shall monitor the alternative habitat for the duration recommended in the BAPP.

(See also Section 3, Additions and Corrections, of this Final EIR, for the updated language.)

Comment No. A1-19

Mitigation Measure #7: Bat Compensatory Mitigation – If the Project shall impact confirmed habitat of bats and avoidance is not achievable, the Project proponent shall provide compensatory mitigation for temporary and permanent loss of any habitat supporting SSC. There shall be no net loss of habitat supporting SSC (CEQA Guidelines, § 15370(e)). Compensatory mitigation shall be provided within the Project boundary at no less than 2:1. Mitigation shall provide appropriate habitat (depending on the species), refugia, and habitat structures that supports that species. A proposed mitigation area/plan shall be provided to the County and include a discussion on the territory size; roosting and foraging locations; food availability; and how all life cycle functions will be mitigated. The replacement habitat shall also be protected in perpetuity under a conservation easement dedicated to a local land conservancy or other appropriate entity, which should include an appropriate endowment to provide for the long-term management of mitigation lands.

Response to Comment No. A1-19

As discussed in Response to Comment No. A1-18, the County agrees with the commenter that compensatory mitigation sufficient to ensure no net loss of bat habitat is required if impacts to occupied habitat cannot be avoided, which is required under Mitigation Measure BIO-10. For the avoidance of doubt, clarifying language has been added to Mitigation Measure BIO-10. See also Response to Comment No. A1-18 and Section 3, Additions and Corrections, of this Final EIR for the revised language. Requiring that the no net loss performance standard is met, together with the other avoidance and protection measures required under Mitigation Measures BIO-8 through BIO-11, is sufficient to ensure that there is no significant impact to bats. Accordingly, no further changes are necessary in response to this comment.

Comment No. A1-20

ADDITIONAL COMMENTS

Additional comments or other suggestions are also included to improve the document.

Mitigation Measure BIO-10 Special Status Reptile Avoidance, Protection, and Relocation Plan – The County should revise Mitigation Measure BIO-13 to incorporate the underlined language and omit language in strikethrough:

A County-approved qualified biologist shall develop a relocation plan for coastal whiptail, coast horned lizard, and California legless lizard <u>if the species is not able to be passively ushered out of harm's way to an area that is unaffected by the Project.</u> At a minimum, the relocation plan shall include the following elements:

- Timing and location of focused surveys that shall be conducted for each species, with greater survey effort allotted to locations with the highest quality habitat and/or greatest potential for impacts
- Habitat and conditions of proposed relocation sites in nearby, undisturbed areas
- Protocols for trapping and relocating individuals of each species
- Protocols for documenting and reporting the number of individuals/species relocated

If the Project results in permanent impacts on documented habitat for these species, compensatory mitigation for the affected species at a <u>minimum 2:1</u> ~~1:1~~ ratio shall be required. Compensatory mitigation may include on- and/or off-site restoration or enhancement of suitable habitat. Depending on the vegetation communities impacted, impacted habitat for special status reptiles may be mitigated through implementation of a standalone mitigation and monitoring plan, or through inclusion in a larger habitat mitigation and monitoring plan developed for the entire Project (refer to Mitigation Measure MM-BIO-19 [Development and Implementation of a Habitat Restoration and/or Replacement Plan]).

The relocation plan shall be submitted to the County and CDFW for approval at least 60 days prior to any ground disturbing activities within potentially occupied habitat. The qualified biologist shall prepare a report documenting the relocation survey results and site clearance activities. The original and final locations of any special status reptile relocations shall be recorded and mapped.

During the recognized activity period of the special-status reptiles (March-November), a qualified biologist shall conduct at least three relocation surveys beginning thirty days prior to the start of construction. If construction occurs during the period of low activity for these species (December to February), the surveys shall be conducted prior to this period and exclusion fencing shall be placed around the construction impact areas to limit recolonization of the site.

A qualified biologist shall be present during the course of the ground-disturbing activities within or adjacent to suitable coastal scrub, oak woodland, and riparian habitat, and shall conduct clearance surveys for special status reptiles prior to the start of construction each day. The qualified biologist shall report the results of the relocation surveys to the County and CDFW. Monitoring of on- or off-site compensatory mitigation shall be conducted at least annually for five years following initial mitigation implementation to track the 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 (refer to Mitigation Measure MM-BIO-18 [Development and Implementation of a Habitat Restoration and/or Replacement Plan]).

Response to Comment No. A1-20

The proposed edits provided in this comment have been included in Mitigation Measure BIO-13 (see also Section 3, Additions and Corrections, of this Final EIR).

Comment No. A1-21

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, § 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).

Response to Comment No. A1-21

Responses to the individual comments on specific mitigation measures have been provided above. Where appropriate, revisions to specific mitigation measures have been made, as discussed in the responses provided above. In addition, see Section 4 of this Final EIR for the Mitigation Monitoring Plan.

Comment No. A1-22

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 (CNDDB). The CNDDB website[4] provides direction regarding the types of information that should be reported and allows on-line submittal of field survey forms.

[4] https://wildlife.ca.gov/Data/CNDDB

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[5].

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

Response to Comment No. A1-22

The comment is acknowledged for the record. The County will ensure that any required information is reported to the applicable databases.

Comment No. A1-23

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.)

Response to Comment No. A1-23

The comment provides information regarding environmental document filing fees related to fish and wildlife, which is acknowledged for the record. The Project will pay all applicable filing fees.

Comment No. A1-24

CONCLUSION

CDFW appreciates the opportunity to comment on the DEIR 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 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 Fe6[6], Environmental Scientist.

[5] https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities/Submit

[6] Phone: (858) 354-3527; Email: Joleena.delafe@wildlife.ca.gov

Response to Comment No. A1-24

CDFW will receive a copy of the Final EIR as well as notification of Project hearings. The remainder of the comment provides general concluding information, which is acknowledged for the record.

LETTER NO. A2

Ventura County Air Pollution Control District
Nicole Collazo, Air Quality Specialist, Planning Division
4567 Telephone Road, 2nd Floor
Ventura, CA 93003
NICOLE@VCAPCD.ORG.

January 30, 2026

Comment No. A2-1

Ventura County Air Pollution Control District (APCD) staff has reviewed the subject Draft Environmental Impact Report (DEIR) for the project referenced above, which analyzed the environmental impacts of a Major Modification to Conditional Use Permit (CUP) No. 1776 to authorize further development of a camp. The project includes approximately 41,000 square feet (sq. ft.) of structures including the following: (1) a welcome center; (2) 13 camper cabins; (3) three head counselor cabins; (4) an arts pavilion; (5) a 58-space parking lot; and (6) landscaping improvements. As part of the project, the number of campers would increase by 100, from 472 to 572 campers. Additionally, the applicant proposes to increase the frequency of events and number of attendees they may have on the project Site. Six existing structures would be demolished, and 15 protected trees would be removed to accommodate the Project. The Lead Agency is the County of Ventura (County).

Response to Comment No. A2-1

The comment provides general introductory information and reiterates the Project description, and is acknowledged for the record.

Comment No. A2-2

APCD has the following comments regarding the project's DEIR.

1) DEIR, Page IV.D-25. The project's construction emissions presented in Table IV.D-6 incorporate stringent emission reduction measures for the reduction of nitrous oxide, or NOx, being generated from the proposed construction off-road diesel equipment. As such, the emissions are considered "mitigated" or with best management practices needed, such as standard conditions of approval to ensure enforcement. The CalEEMod air emission reports found in Appendix B, Air Quality Technical Modeling, contain the following assumptions (PDF Page 48, 49, 50, 90, 91), found on Page 2.

APCD recommends amending Table IV.D-6 to state the emissions are “mitigated” or reduced with emission reduction measures, as APCD does not have adopted numerical thresholds for constructions and therefore mitigation may not be the appropriate term. However, emissions are always recommended to be quantified for construction and the projected emissions were estimated at 29 lbs./day for NOx, over the adopted threshold for operational emissions. The reduction strategy chosen was Tier 4 Final, the strictest tier of EPA-rated diesel off-road equipment. It may be that Tier 4 Interim or Tier 3 may suffice to bring emissions down below 25 lbs./day. However, APCD still recommends changing the language and discussion in the Air Quality analysis of the DEIR to disclose emissions presented are with the incorporation of Tier 4 Final equipment.

2. Emissions Summary

2.1. Construction Emissions Compared Against Thres

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHG

Un/Mit.	ROG	NOx
Daily, Summer (Max)	–	–
Unmit.	3.21	29.2
Mit.	0.72	5.03
% Reduced	78%	83%
Daily, Winter (Max)	–	–
Unmit.	6.02	9.97
Mit.	5.27	3.70
% Reduced	12%	63%

2.3. Construction Emissions by Year, Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs

Year	ROG	NOx	
Daily - Summer (Max)	–	–	
2026	0.72	4.58	3
2027	0.64	5.03	2
Daily - Winter (Max)	–	–	
2026	0.04	0.98	1
2027	0.42	3.06	1
2028	5.27	3.70	1

1.3. User-Selected Emission Reduction Measures by Emissions Sector

Sector	#	Measure Title
Construction	C-5	Use Advanced Engine Tiers

Building Construction	Tractors/Loaders/Backhoes	Diesel	Average	3.00
Paving	Pavers	Diesel	Average	2.00
Paving	Paving Equipment	Diesel	Average	2.00
Paving	Rollers	Diesel	Average	2.00
Architectural Coating	Air Compressors	Diesel	Average	1.00
Trenching	Trenchers	Diesel	Average	1.00

5.2.2. Mitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day
Demolition	Rubber Tired Dozers	Diesel	Tier 4 Final	2.00
Demolition	Excavators	Diesel	Tier 4 Final	3.00
Demolition	Concrete/Industrial Saws	Diesel	Tier 4 Final	1.00
Site Preparation	Rubber Tired Dozers	Diesel	Tier 4 Final	3.00
Site Preparation	Tractors/Loaders/Backhoes	Diesel	Tier 4 Final	4.00
Grading	Graders	Diesel	Tier 4 Final	1.00

Response to Comment No. A2-2

The comment is incorrect. The emissions estimates provided in Table IV.D-6 of the Draft EIR do not assume any mitigation measures, nor any Tier IV technology. Those inputs were included in

the modeling as a sensitivity run, but the data provided in Draft EIR Table IV.D-6 reflects unmitigated construction emissions.

Comment No. A2-3

Thank you for the opportunity to comment on the DEIR. If you have any questions, you may contact me at nicole@vcapcd.org.

Response to Comment No. A2-3

The comment provides general concluding information, which is acknowledged for the record.

LETTER NO. A3

County of Ventura
Roxy Cabral, R.E.H.S.
Land Use Section
Environmental Health Division
800 South Victoria Avenue
Ventura, CA 93009
ROXY.CABRAL@VENTURACOUNTY.GOV.

January 27, 2026

Comment No. A3-1

Ventura County Environmental Health Division (Division) staff reviewed the information submitted for the subject project.

The project was initially reviewed by this Division in 2022 under PL22-0032. The below comments and conditions reflect comments and conditions provided in the previous review.

Response to Comment No. A3-1

The comment provides general introductory information, which is acknowledged for the record.

Comment No. A3-2

Hazardous Materials/ Hazardous

1. The project includes the continues use and storage of hazardous materials and/or hazardous waste. The existing business has an active hazardous waste generator permit from Ventura County Environmental Health Division/Certified Unified Program Agency (FA0004886).

Hazardous Materials/Waste Management (CUPA Permit Required)

Purpose: To comply with the California Code of Regulations Title 22, Division 4.5, California Health and Safety Code chapter 6.95; and Ventura County Ordinance Code, and to ensure the safe storage, handling, and disposal of any potentially hazardous material and/or waste.

Requirement: The Permittee shall submit a Hazardous Materials Business Plan (HMBP) to the Environmental Health Division/Certified Unified Program Agency (Ventura CUPA) for storage of hazardous materials above reporting thresholds (200 cubic feet gas, 55 gallons liquid, 500 pounds solid). If hazardous wastes are generated, an EPA ID number issued by the California Department of Toxic Substances Control must be obtained and maintained in active status.

Wastes identified as "non-hazardous" may require waste determination analysis to confirm if wastes are listed hazardous wastes, exhibits a hazardous characteristic through testing, or application of general knowledge.

Documentation: A completed HMBP must be submitted to the Ventura CUPA electronically through the California Environmental Reporting System (CERS). Maintain all records of hazardous waste determination testing and disposal and make available for review by this Ventura CUPA staff upon request.

Timing: HMBP must be submitted through CERS annually, and whenever there is a change to the type, quantity, or location of the hazardous materials. EPA ID number must be renewed annually.

Monitoring and Reporting: Verification of hazardous materials inventory as well as ongoing compliance with requirements shall be accomplished through field inspection by Ventura CUPA staff. Additional information on the storage and handling requirements for hazardous materials and wastes may be found on the Ventura County Environmental Health Division/Certified Unified Program Agency website: https://rma.venturacounty.gov/divisions/environmental-health/cupa-certified-unified-program-agency/

Response to Comment No. A3-2

The comment notes that the existing business has an active hazardous waste generator permit from Ventura County Environmental Health Division/Certified Unified Program Agency (FA0004886), but does not state a specific concern or question regarding the adequacy of the analysis of environmental impacts contained in the Draft EIR. The Project would not result in any change to this status. Nevertheless, the Condition of Approval (COA) provided in the comment will be made a COA for the Project.

Comment No. A3-3

Public Health

2. The proposed project is a camp and shall be in compliance with all applicable State and local Environmental Health Division requirements standards.

Organized Camps

Purpose: To ensure that organized camps are designed, constructed and operated in compliance with all applicable State and local Environmental Health Division (EHD) requirements, including California Health and Safety Code and California Code of Regulations Title 17, Title 22, and Title 24.

Requirement: The Permittee shall obtain a Permit to Operate from the Ventura County EHD, Community Services Section for the organized camp, swimming pool and/or food facilities.

Documentation: Submit the required application and plans to the Ventura County EHD, Community Services Section for review and approval.

Timing: Permittee shall obtain all applicable building permits prior to construction. Permittee shall obtain final construction approval and a Permit to Operate prior to use of organized camp facilities.

Monitoring: Plan review and construction inspections, as well as routine site inspections to ensure ongoing compliance with regulations related to organized camps, shall be conducted by Ventura County EHD, Community Services staff.

Response to Comment No. A3-3

The Project would be operated in accordance with all applicable State and local Environmental Health Division requirements standards. In addition, the COA provided in the comment will be made a COA for the Project.

Comment No. A3-4

3. Horseback riding is an activity offered by the camp. Ensure the site does not contribute to the harborage and/or breeding of potential vectors of disease or create a public nuisance.

General Vector Control – Animal Waste and Mosquito Breeding

Purpose: To ensure site does not contribute to the harborage and/or breeding of potential vectors of disease or create a public nuisance.

Requirement: The storage, handling and disposal of animal wastes shall be in a manner that will not create or promote potential breeding and/or harborage of vectors of disease, such as flies, mosquitoes, and rodents. Ensure animal waste is stored properly and removed as often as needed to prevent fly breeding. Manage standing water onsite, including any stormwater management structures, so it will not create mosquito breeding sources.

Timing: The Permittee shall maintain the Project site so as not to contribute to the harborage and/or breeding of potential vectors of disease, nor the creation of a public nuisance throughout the life of the Project.

Monitoring: Ventura County Environmental Health Division (EHD) staff will receive and respond to vector related complaints at the site. The Division will maintain a record of vector related complaints reported to the Division.

Response to Comment No. A3-4

Horseback riding is an existing activity that is offered by the camp, and the Project would continue to offer this as an activity. The comment does not state a specific concern or question

regarding the adequacy of the analysis of environmental impacts contained in the Draft EIR. Nevertheless, the COA provided in the comment will be made a COA for the Project.

Comment No. A3-5

Domestic Water

4. The proposed project is for the modification to the CUP for construction of new camper and counselor cabins, new Welcome Center, and new art pavilion. Existing facility has an active permit to purvey water as a non-transient non-community public water system issued by the State Water Resources Control Board, Division of Drinking Water (DDW). Any remodel, addition, upgrade, etc. to the existing water system components or source water must be reviewed and approved by the DDW prior to construction. Compliance with state and local laws will reduce impacts to less than significant.

If you have any questions, please contact me at (805) 654-2830 or Roxy.Cabral@venturacounty.gov.

Response to Comment No. A3-5

The comment is acknowledged for the record. The Project would comply with all applicable state and local laws. In addition, should any remodel, addition, or upgrade to the existing water system take place, such modification would be reviewed by the DDW prior to construction.

LETTER NO. A4

Ventura County Fire Department
Fire Prevention Bureau
Corina Cagley, Fire Prevention Officer
2400 Conejo Spectrum Street
Thousand Oaks, CA 91320
FIREPREVENTION@VENTURA.ORG

January 28, 2026

Comment No. A4-1

Description: The Project Applicant requests a Major Modification to Conditional Use Permit No. 1776 and a Discretionary Tree Permit be granted to authorize development of additional facilities at Camp Alonim. Proposed facilities include the following: • Welcome Center: a 4,460 sq. ft. building consisting of a lobby, staff lounge, offices, and meeting rooms; • Camper Cabins: 13 camper cabins, each consisting of 1,930 sq. ft. with two bunkrooms and two bathrooms; • Head Counselor Cabins: three cabins of 441 sq. ft. each; • Arts Pavilion: a 2,307 sq. ft. open-air shade structure for arts and crafts activities; • Parking Lot: a new 58-space parking lot adjacent to the Welcome Center; and • Landscaping: landscaping improvements around the new structures

Response to Comment No. A4-1

The comment reiterates information from the Project description, which is acknowledged for the record.

Comment No. A4-2

Draft EIR reviewed by the Ventura County Fire Protection District.

Document description indicates that the Access Road will remain unchanged.

"Peppertree Lane, a private road, provides access to the camp. Peppertree Lane is the southern continuation of Tapo Canyon Road, a major thoroughfare in Simi Valley. Access would remain unchanged with the development of the Project. Water services are provided by the Brandeis-Bardin Mutual Water Company, which receives imported water through the Calleguas Municipal Water District. Wastewater is handled by the City of Simi Valley."

To ensure that adequate fire department access is provided in conformance with current California State Law and Ventura County Fire Protection District Ordinance. The access

on High Road will be required to be upgraded where topography allows, to 24 feet with no on-street parking permitted. The applicant has submitted a fire access plan indicating additional turnouts and turnarounds along with the upgraded road where possible to 24 feet.

Response to Comment No. A4-2

It is unclear where the underlined language appears in the Draft EIR. Appendix M-2 of the Draft EIR provides the fire access exhibit that is referenced in the comment, and that shows the additional turnouts and turnarounds, as well as locations where the road would be upgraded to 24 feet.

LETTER NO. A5

County of Ventura Public Works Agency
James Maxwell, PG, CEG,
Land Development Services
(Address Not Provided)

December 23, 2025

Comment No. A5-1

1. Draft Environmental Impact Report

The Draft Environmental Impact Report (DEIR) has been reviewed for Geology and Grading. The following comments have been provided:

Geology/Grading:

1. Multiple geohazards (seismically induced landslides, liquefaction hazard areas, mapped landslides, fault traces, are mapped throughout the entirety of the project site and areas of proposed development. A geologic and geotechnical engineering investigation shall be performed to address the hazard potential and shall be submitted for review and approval prior to any development. The investigation shall also include any appropriate and sufficient safeguards to be incorporated into the project design.

Response to Comment No. A5-1

A geotechnical investigation was prepared for the Project Site (included in Appendix E-1 of the Draft EIR) and is incorporated into Section IV.H, Geology and Soils, of the Draft EIR. As discussed on Draft EIR page IV.H-14, there are no known active faults on the site and the nearest fault is the Simi Fault, which is mapped approximately 2.9 miles north of the site. As discussed on Draft EIR page IV.H-15, the proposed cabins are located outside the limits of the designated area of liquefaction potential presented on the State of California Seismic Hazard Zone Map and are underlain by terrace deposits. Therefore, liquefaction is not considered a potential hazard for the cabins. The proposed welcome center is located within a zone of potential liquefaction. Previous studies to the north of the proposed welcome center encountered dense older alluvium that was not subject to liquefaction, and similar conditions are anticipated around the welcome center. Finally, as discussed on Draft EIR pages IV.H-16 and IV.H-16 regarding landslides, the slope areas to the east of the site are located within landslide hazard areas. However, these slopes are not considered to represent a landslide hazard to the site as they appear to be comprised of mostly bedrock with a thin layer of topsoil. Nevertheless, the geotechnical report will be submitted for review and approval prior to the issuance of grading

and building permits, and the Project will incorporate all applicable recommendations contained in the geotechnical report.

Comment No. A5-2

2. A Grading Permit is required unless sufficient information is submitted to Public Works Agency showing the project is exempt under Section J103.2 of the Ventura County Building Code. Based on the information presented in the Draft EA, a Grading Permit may be required. Information is available on the following website: https://publicworks.venturacounty.gov/es/lds-grading/.

Response to Comment No. A5-2

The Project will comply with all applicable requirements, including the requirement to obtain a Grading Permit, if necessary.

Comment No. A5-3

3. ADVISORY: Multiple redline channels exist within the project area. A Watercourse Development Permit is required for any work performed in the channels.

Response to Comment No. A5-3

The comment is noted for the record. Should any work be performed in the redline channels, the Project would comply with the requirement for a Watercourse Development Permit.

Comment No. A5-4

4. ADVISORY: Multiple areas of the site exist within FEMA mapped hazards zones(Zone A). Floodplain Development Permits will be required for any work done in the mapped hazard areas.

Response to Comment No. A5-4

The comment is noted for the record. Should any work be performed in any FEMA mapped hazard areas, the Project would comply with the requirement for a Floodplain Development Permit.

LETTER NO. A6

County of Ventura Public Works Agency
John Gauthier, Groundwater Specialist
PWA-WP Groundwater Resources Section
JOHN.GAUTHIER@VENTURACOUNTY.GOV.

January 30, 2026

Comment No. A6-1

The Ventura County Public Works Agency – Watershed Protection, Water Resources Division, Groundwater Resources Section (GRS) has reviewed the Draft Environmental Impact Report and is providing this memorandum with comments to ensure thorough evaluation of potential impacts relating to groundwater quantity and quality.

PROJECT DESCRIPTION

The Project Applicant, American Jewish University, requests a Major Modification to Conditional Use Permit (CUP) No. 1776 to authorize further development of a camp. The Project includes approximately 41,000 square feet (sq. ft.) of structures including the following: (1) a welcome center; (2) 13 camper cabins; (3) three head counselor cabins; (4) an arts pavilion; (5) a 58-space parking lot; and (6) landscaping improvements. As part of the Project, the number of campers would increase by 100, from 472 to 572 campers. Additionally, the Applicant proposes to increase the frequency of events and number of attendees they may have on the Project Site. Six existing structures would be demolished, and 15 protected trees would be removed to accommodate the Project. The modified CUP would also formally authorize the water system serving the project, the Brandeis-Bardin Mutual Water Company has the necessary water capacity available to supply domestic and firefighting purposes, pursuant to Ventura County Waterworks Manual.

Response to Comment No. A6-1

The comment provides general introductory information and reiterates information from the Project description, which is acknowledged for the record.

Comment No. A6-2

Well Inventory and Status

Utilizing Assessor's Parcel Numbers (APN) provided in Table I-2 of the DEIR, the GRS performed a review of the Ventura County well inventory database. It was determined that the

parcels summarized in Table 1 contained one or more wells out of compliance with the Ventura County Ordinance No. 4468 (Ordinance 4468).

Abandoned groundwater wells pose a potentially significant impact to water resources as they create preferential pathways for any overland flows to infiltrate into aquifers. If a well screen is installed over more than one aquifer, hydraulic communication between the aquifers creates the potential for groundwater contamination to extend further.

It is necessary that the potentially significant impact to groundwater quality created by the abandoned wells shown in Table - 1 be included in subsequent EIRs.

Table 1 – Project Site Well Inventory and Status

APN	SWID	Status
685-0-051-040	02N17W18L01S	Abandoned
685-0-051-050	02N17W17M02S	Abandoned
685-0-051-140	02N17W19L01S	Cannot Locate
	02N17W18Q01S	Abandoned
685-0-051-190	02N18W24Q02S	Abandoned
	02N18W24Q01S	Abandoned
685-0-051-210	02N18W24F01S	Abandoned

DEIR Section IV. J HAZARDS AND HAZARDOUS MATERIALS

Paragraph two of PAGE IV.J-13, in Subsection C. - Hydrogeology of the DEIR asserts that a review of several databases and inventories conducted did not identify any wells at the Projects Site. As shown in Table – 1 there are seven wells on the Project Site, consisting of six with a status of Abandoned and one with a status of Cannot Locate.

It is necessary that subsequent EIRs provide an accurate inventory of all wells at the project site and include wells listed in Table -1 from the GRS well inventory database.

If you have any questions, please contact me at (805) 654-5164 or

John.Gauthier@venturacounty.gov.

Response to Comment No. A6-2

The discussion in Draft EIR Section IV.J, Hazards and Hazardous Materials, is based on the Phase I Environmental Site Assessment (ESA) that is included in Appendix G of the Draft EIR. The Phase I ESA only addresses a portion of APN 685-0-051-040, focused on where Project construction activities would occur (Development Footprint). The comment is correct that, consistent with Draft EIR Table I-2, there are multiple parcels that make up the larger 2,588-acre Subject Parcels (APNs 685-0-051-190, 685-0-051-210, 685-0-051-040, 685-0-051-050, 685-0-051-140). The wells listed in the comment are located within the larger 2,588-acre Subject Parcels, but outside of the Development Footprint, and therefore would not be impacted by the Project. Nevertheless, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

LETTER NO. A7

County of Ventura Public Works Agency
Yunsheng Su, PWA-WP Case Reviewer
YUNSHENG.SU@VENTURA.ORG

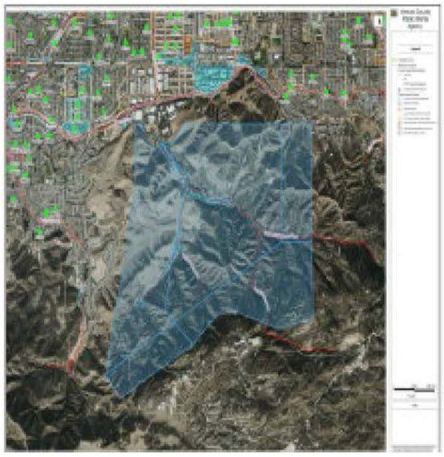
December 30, 2025

Comment No. A7-1

Pursuant to your request dated 12/22/2025, this office has reviewed the submitted materials and provides the following comments.

PROJECT LOCATION:

1101 Peppertree Lane, Simi Valley, CA, 93065 Location Map:



PROJECT DESCRIPTION:

The Project Applicant requests a Major Modification to Conditional Use Permit No. 1776 and a Discretionary Tree Permit be granted to authorize development of additional facilities at Camp Alonim. Proposed facilities include the following: • Welcome Center: a 4,460 sq. ft. building consisting of a lobby, staff lounge, offices, and meeting rooms; • Camper Cabins: 13 camper cabins, each consisting of 1,930 sq. ft. with two bunkrooms and two bathrooms; • Head Counselor Cabins: three cabins of 441 sq. ft. each; • Arts Pavilion: a 2,307 sq. ft. open-air shade structure for arts and crafts activities; • Parking Lot: a new 58-space parking lot adjacent to the Welcome Center; and • Landscaping: landscaping improvements around the new structures. Three housing trailers, two cottages, and a garage would be demolished to accommodate the new development. The Project would also require the removal of 74 trees, 15 of which are protected. The protected trees to be removed include nine coast live oaks, one sycamore, and

five large ornamental trees that are classified as heritage trees. The heritage trees include four pepper trees and one eucalyptus tree. The Project would also encroach upon the protected zones of 67 trees, 42 of which are protected trees. These include 20 oaks, 18 sycamores, and four heritage-sized pepper trees. The total allowed number of camp attendees would increase from 472 (400 for Camp Alonim, 72 for the Brandeis Collegiate Institute) to 572 (500 for Camp Alonim, 72 for the Brandeis Collegiate Institute). The allowable number of events, which are presently limited to 15 days per year on Saturdays and Sundays with up to 300 attendees, would increase to the following: • up to 150 annual event days with attendance of up to 300 people; • up to ten annual event days with attendance of up to 500 people; and • up to six annual event days with attendance of up to 1,000 people. There would be no change to the maximum number of camp staff, which would remain at 200. Peppertree Lane, a private road, provides access to the camp. Peppertree Lane is the southern continuation of Tapo Canyon Road, a major thoroughfare in Simi Valley. Access would remain unchanged with the development of the Project. Water services are provided by the Brandeis-Bardin Mutual Water Company, which receives imported water through the Calleguas Municipal Water District. Wastewater is handled by the City of Simi Valley. As part of the Major Modification, the Conditional Use Permit's scope will also be expanded to include authorization of all existing and proposed Brandeis-Bardin Mutual Water Company facilities. The proposed project would also extend the life of the Conditional Use Permit for the camp and associated uses. Presently, the Conditional Use Permit is set to expire in 2042. As proposed, the permit would be extended indefinitely and would not have an expiration date.

Response to Comment No. A7-1

The comment provides a summary of the Project description, which is acknowledged for the record.

Comment No. A7-2

APPLICATION COMPLETENESS:

Complete - from our area of concern.

Response to Comment No. A7-2

The comment notes that the Public Works Agency considers the Project application complete, which is acknowledged for the record, and which will be forwarded to the decision-making bodies for their review and consideration.

Comment No. A7-3

ENVIRONMENTAL IMPACT ANALYSIS:

Item 31a. Flood Control Facilities/Watercourses – Ventura County Public Works Agency, Watershed Protection is deemed to be Less Than Significant.

The proposed project is situated about 10 feet from the East Tributary Meier Canyon, which is a WP jurisdictional redline channel. The applicant's submitted materials indicate new or modified direct stormwater drainage connections to this WP channel, activities within the WP's easement, or activities over, under, or within the redline channel have been proposed. A Watercourse/Encroachment Permit must be obtained from WP.

The proposed development shall incorporate mitigation measures to address cumulative impacts due to the proposed increase in imperviousness. It is understood that impacts from the proposed increase in impervious area and stormwater drainage design within the project site will be required to be mitigated to less than significant under the conditions imposed by County of Ventura (the Lead Agency). WP will review the mitigation measures in detail during the permitting process. Project shall not increase peak storm runoff in the 10-, 25-, 50-, and 100-yr storms consistent with District policy and WP-2 Ordinance.

WP staff determines that the proposed project design with the conditions mentioned above mitigates the direct and indirect project-specific and cumulative impacts to flood control facilities and watercourses. Therefore, the environmental impact is less than significant (LS) on redline channels under the jurisdiction of the Ventura County Public Works Agency - Watershed Protection.

Response to Comment No. A7-3

As discussed on Draft EIR pages IV.K-15 through IV.K-18, the Project design incorporates measures, including bio-filtration basins, to address cumulative impacts resulting from the increase in impervious surfaces, as detailed in the Drainage Report, which is included in Appendix H-1 of the Draft EIR. In accordance with the Ventura County Hydrology Manual Guidelines, the analysis demonstrates that peak storm runoff for both 10-year and 100-year events would not increase.

Comment No. A7-4

Item 17b. Hydraulic Hazards - FEMA is deemed to be Less Than Significant.

The project site is in a location identified by the Federal Emergency Management Agency (FEMA) as an area of Special Flood Hazard Area Zone A. This is evidenced on FEMA Map Panel 06111C0864E effective January 20, 2010. Therefore, the project must comply with the County of Ventura Floodplain Management Ordinance, which provides minimum standards for development in the Special Flood Hazard Area. The proposed development with the condition described below is therefore, deemed to be Less than Significant for Hydraulic Hazards - FEMA.

Response to Comment No. A7-4

The Project would comply with all applicable requirements, including the County of Ventura Floodplain Management Ordinance. In addition, as described below in Responses to Comment

Nos. A7-5 through A7-7, the conditions included in this letter would be made conditions of approval upon the Project.

Comment No. A7-5

WATERSHED PROTECTION COMMENTS:

None.

WATERSHED PROTECTION CONDITIONS:

Watercourse/Encroachment Permit

Purpose: To comply with the Ventura County Watershed Protection District (County) Ordinance, and mitigate potential impacts such as obstructing, impairing, diverting, impeding, or altering the characteristics of the flow of water to jurisdictional channels by designing and constructing appropriate surface drainage and flood control facilities to protect life and property from damage or destruction from flood and storm waters.

Requirement: The Permittee shall obtain a Watercourse/Encroachment Permit. The permit application shall include the following:

a. Construction plans prepared, signed, and stamped by a California licensed civil engineer including but not limited to, a site plan depicting general drainage trends, existing and proposed topography with elevations, proposed improvements in both plan and profile, and construction details that meet the standards of the County of Ventura and the WP.

b. Site specific hydrology for existing and proposed conditions that conforms to the WP's Hydrology Manual.

c. Hydraulics using a methodology and/or computer model applicable to the proposed improvements and acceptable to the WP. The final model shall confirm there are no adverse impacts to East Tributary Meier Canyon including no loss of storage volume and no increase in water surface elevation for the 1-percent chance flood peak discharge on adjacent parcels.

d. Any other information or studies required by the Permit Section to administer the requirements of watershed Ordinance WP-2.

Documentation: A WP Permit application package shall be prepared and signed by the Permittee or a duly authorized agent and submitted to and logged by the WP Permit Section.

Timing: The applicant shall obtain an encroachment permit prior to obtaining a building permit or grading permit or prior to project start date if no grading or building permits are required.

Monitoring and Reporting: Prior to permit closure, WP staff shall inspect the improvements to assure that construction was completed, in accordance with the approved plans and the Permit.

Response to Comment No. A7-5

The comment provides a watershed protection condition, which will be added to the Conditions of Approval for the Project.

Comment No. A7-6

Floodplain Development Permit Purpose: To comply with the Ventura County Floodplain Management Ordinance and Ventura County General Plan policies HAZ-2.1, HAZ-2.2, HAZ-2.3 and HAZ-2.5.

Requirement: The Permittee shall obtain a Floodplain Development Permit from the Ventura County Public Works Agency Floodplain Manager.

Documentation: A Floodplain Development Permit issued by the Public Works Agency Floodplain Manager.

Timing: The Floodplain Development Permit shall be obtained by the Applicant prior to issuance of a building permit or prior to ground disturbance if a building permit is not required.

Monitoring and Reporting: A copy of the approved Floodplain Development Permit shall be provided to the Building and Safety Department as well as maintained in the case file by the Public Works Agency.

Response to Comment No. A7-6

The comment provides a floodplain development condition, which will be added to the Conditions of Approval for the Project.

Comment No. A7-7

Elevation Certificate Purpose: To comply with the Ventura County Floodplain Management Ordinance and Ventura County General Plan policies HAZ-2.2 and HAZ-2.5 by obtaining an elevation certificate.

Requirement: The Permittee shall provide Elevation Certificate for each permitted structure.

Documentation: The Elevation Certificate(s) prepared by a licensed Civil Engineer or Licensed Public Land Survey.

Timing: The Elevation Certificate(s) shall be prepared prior to occupancy.

Monitoring and Reporting: A copy of the approved Elevation Certificate(s) shall be provided to the Building and Safety Department as well as maintained in the case file by the Public Works Agency.

Response to Comment No. A7-7

The comment provides a floodplain development condition (for an elevation certificate), which will be added to the Conditions of Approval for the Project.

Comment No. A7-8

If you have any questions, please feel free to contact me by email at Yunsheng.Su@Ventura.Org or by phone at 805-654-2005.

Response to Comment No. A7-8

The comment provides general concluding information, which is acknowledged for the record.

LETTER NO. A8

California Water Board
Los Angeles Regional Water Quality Control Board
Elisha Wakefield
Senior Environmental Scientist
320 West 4th Street, Suite 200
Los Angeles, CA 90013
ELISHA.WAKEFIELD@WATERBOARDS.CA.GOV

January 30, 2026

Comment No. A8-1

Dear Ms. Cutis,

Thank you for the opportunity to comment on Los Angeles County Department of Regional Planning's Draft Environmental Impact Report for the American Jewish University-Alonim Project (project). The proposed project would involve the development of additional facilities at Camp Alonim in the Simi Valley area of Ventura County. The would include a 4,460 sq. ft welcome center, 13 camper cabins, head counselor cabins, art pavilion, 58 space parking lot and landscaping.

Our comments are submitted in compliance with CEQA Guidelines §15096, which requires California Environmental Quality Act responsible agencies to focus on shortcomings in the Draft Environmental Impact Report (DEIR), and on additional alternatives or mitigations which should be included.

Response to Comment No. A8-1

The comment provides general introductory information about the Project and the commenter, which is acknowledged for the record, and which will be forwarded to the decision-making bodies for their review and consideration.

Comment No. A8-2

The State Water Board and the Regional Water Quality Control Boards (RWQCB) regulate discharges to protect the quality of water of the State, broadly defined as "the chemical, physical, biological, bacteriological, radiological, and other properties and characteristics of

water which affects its use"[7]. If the proposed project has any of the following discharges, the project proponent is required to obtain a permit from the State or Regional Water Boards:

Discharge Type	Types of Permits involved
• Discharge of dredge and fill materials	- Clean Water Act (CWA) §401 water quality certification for federal waters; or Waste Discharge Requirements for non-federal
Discharge Type	**Types of Permits involved**
• Wastewater discharges • Other discharges	-CWA §402 National Pollutant Discharge Elimination System permit, e.g. storm water permit. -Waste Discharge Requirements or other permits for discharges that may affect groundwater quality and other waters of the State, such as operation of proposed solid waste transfer facilities, and other proposed project activities.

Discharges into impaired waters of the State may contribute or exasperate existing impaired waters and may serve to cause and contribute loading to downstream waters as well.

Early consultation is encouraged, as project reconfiguration may be required to avoid and minimize impacts to State waters, this included ephemeral waters.

Response to Comment No. A8-2

The Project does not include any of the discharge types noted in the comment. Nevertheless, the comment regarding discharges into impaired waters of the State, and the requirement for a permit for such discharges, is acknowledged for the record.

Comment No. A8-3

In regards to Water and Wetlands Regulations, the draft EIR does not address the full regulatory authority of the Los Angeles Regional Water Quality Control Board (Los Angeles Water Board). The Draft EIR erroneously only discusses the need for a RWQCB 401 Certification, which "is triggered whenever a USACE 404 Permit is required, or whenever an activity could cause a discharge of dredged or fill material into water of the U.S. or wetlands" (Page IV.E-8). The appears to assume that the jurisdiction of the Los Angeles Water Board is the same as the jurisdiction of the U.S. Army Corps of Engineers (USACE). It is important to note in the draft EIR, that in addition to the Waters of the US, the Los Angeles Water Board also has jurisdiction over ephemeral waters (including the ones located at the project site) under the

[7] California Water Code, §13050.

Porter-Cologne Act. Impacts on resources classified as Waters of the State (but not Waters of the US) are required to have a Waste Discharge Requirements permit. The project proponents should coordinate with RWQCB staff to determine the state jurisdictional boundaries for this project, under both the Clean Water Act and the Porter Cologne Act.

Response to Comment No. A8-3

The comment clarifies the authority of the Los Angeles Regional Water Quality Control Board, which is acknowledged for the record, and which will be forwarded to the decision-making bodies for their review and consideration. The information contained in the comment has been added to Section 3, Additions and Corrections, of this Final EIR.

Comment No. A8-4

Please be aware, as a permitting authority, the Los Angeles Water Board has the discretion to approve a project only if the applicant has demonstrated the following:

a. A sequence of actions has been taken to first avoid, then to minimize, and lastly compensate for adverse impacts that cannot be practicably avoided or minimized to waters of the state;

b. The potential impacts will not contribute to a net loss of the overall abundance, diversity, and condition of aquatic resources in a watershed (or multiple watersheds when compensatory mitigation is permitted in another watershed)

c. The discharge of dredged or fill material will not violate water quality standards and will be consistent with all applicable water quality control plans and policies for water quality control; and

d. The discharge of dredged or fill material will not cause or contribute to significant degradation of waters of the state.

Response to Comment No. A8-4

The comment provides information about permitting authority of the Los Angeles Regional Water Quality Control Board, which is acknowledged for the record.

Comment No. A8-5

Again, thank you for this chance to comment. We welcome the opportunity to work with you and the project proponent on this project. If we may clarify any of our comments or be of further assistance, please contact Man Voong or Celine Gallon by email at

Man.Voong@waterboards.ca.gov or Celine.Gallon@waterboards.ca.gov

Response to Comment No. A8-5

The comment provides general concluding information, which is acknowledged for the record.

LETTER NO. A9

Corina Cagley
Assistant Fire Marshal
2400 Conejo Spectrum Street
Thousand Oaks, CA 91320
CORINA.CAGLEY@VENTURACOUNTY.GOV

January 29, 2026

Comment No. A9-1

Please see the below editorial comments from Fire for the American Jewish University Camp Alonim and the memo for Non-County RMA input.

J. Hazards and Hazardous Materials

page IV.J-3

Federal Regulatory Setting - vi)

Comment: Uniform Fire Code shouldn't be under Federal and VCFD didn't adopt IFC until 2003. Not a federal code located in the wrong area, and we don't use the UFC should be State and local adoptions.

Response to Comment No. A9-1

The comment is noted for the record. See Section 3, Corrections and Additions, of the Final EIR for the corrected information.

Comment No. A9-2

M. Public Services Utilities and Services System

Page IV.M-2

11) Ventura County Fire Code

Comment: Update Ordinance 34. (not subject to 2022 code). Update footnote 2 to eliminate the statement project is currently subject to 2022 code is incorrect. Subject to the 2025 codes that are effective 2026.

Response to Comment No. A9-2

The comment is noted for the record. See Section 3, Corrections and Additions, of the Final EIR for the updated information.

Comment No. A9-3

Page 384- IV.M-3

a. Existing Conditions

Comment: Add Santa Paula as the 7th city which was effective 2018. (Not 10) First paragraph corrected also change square miles and populations to reflect added S.P City.

Comment: add rescue ambulances, some stations have paramedics.

Response to Comment No. A9-3

See Section 3, Corrections and Additions, of the Final EIR for the updated information.

Comment No. A9-4

Page 386 IV.M-5

Impact Fire-1

Comment: Add: In paragraph- Additional Road widening High Road where possible to 24 feet with turnouts and turnarounds for emergency vehicles.

Comment: Add: Mitigation Measures under Requirement: Additional Road widening High Road where possible to 24 feet with turnouts and turnarounds for emergency vehicles

Response to Comment No. A9-4

See Section 3, Corrections and Additions, of the Final EIR for the updated information. In addition, Appendix M-2 of the Draft EIR provides the fire access exhibit that shows the additional turnouts and turnarounds, as well as locations where the road would be upgraded to 24 feet.

Comment No. A9-5

R. Wildfire

page 444 IVR-1

Regulatory Setting

a. Federal

This is not a Federal Regulation first paragraph,

- The Project Site is located within a State Responsibility Area (SRA)for purposes of fire protection (i.e., an area where the state government is responsible for wildfire protection), and therefore, federal wildfire regulations do not apply to the Project Site or within the immediate area (This statement is okay). The Federal National Incident Management System (NIMS) provides a shared vocabulary, systems, and processes to prevent, protect against, mitigate, respond to and recover from disaster, and is relevant should a wildfire event become extraordinary and require federal support. NIMS is intended to standardize response to emergencies involving multiple jurisdictions or multiple agencies and is complementary to the State Standardized Emergency Management System (SEMS). Both systems utilize the Incident Command System (ICS) as their core field operations protocol so that all parties are essentially speaking the same language.

Response to Comment No. A9-5

The comment is noted for the record. See Section 3, Corrections and Additions, of the Final EIR for the updated information.

Comment No. A9-6

- NIMS has nothing to do with Wildfire- It's the ICS System nothing to do with Wildfire.

Response to Comment No. A9-6

The comment is noted for the record. See Section 3, Corrections and Additions, of the Final EIR for the corrected information.

Comment No. A9-7

b) State

i) California Fire Code

Comment: State in this paragraph that it's in an SRA Very High Zone. CFC does not address access, that is a local ordinance, also reference VCFD Ordinance in this paragraph. Note: WUI Code - Building and Safety enforces the WUI Code Part 7 of the California Building Standards Code.

Response to Comment No. A9-7

See Section 3, Corrections and Additions, of the Final EIR for the updated information.

Comment No. A9-8

Page 445 IV.R-2

B. Fire Hazard Severity Zones-

- identify where the FHSZs area are.

Response to Comment No. A9-8

See Section 3, Corrections and Additions, of the Final EIR for the updated information.

Comment No. A9-9

Page 448 IV.R-5

iii) Ventura County Fire Department

Comment: (Ordinance 32, updating Chapter 49 of the Fire Code (effective January 1, 2023), Update first paragraph- Ordinance 34 adopts the CA WUI code with local amendments.

- Ventura County Fire Code applies, and the Ventura County Wildland Urban Interface Code applies- article 3 and article 4 of Ordinance 34.

- Remove Footnote 3 -Must meet current code when applying for building permits. Requirements for defensible space must meet the current code in effect, at time of application or installation of landscape.

Response to Comment No. A9-9

The comment is noted for the record. See Section 3, Corrections and Additions, of the Final EIR for the updated information.

Comment No. A9-10

Page 454 IV.R-11

Comment: Update bulleted items bottom page to include- Additional Road widening High Road where possible to 24 feet with turnouts and turnarounds for emergency vehicles.

Response to Comment No. A9-10

See Section 3, Corrections and Additions, of the Final EIR for the updated information. In addition, Appendix M-2 of the Draft EIR provides the fire access exhibit that shows the additional turnouts and turnarounds, as well as locations where the road would be upgraded to 24 feet.

Comment No. A9-11

Page 457 IV.R-14 & IV.R-10

Comment: Impact WF-1 & WF-3 also add: Additional Road widening High Road where possible to 24 feet with turnouts and turnarounds for emergency vehicles.

Response to Comment No. A9-11

See Section 3, Corrections and Additions, of the Final EIR for the updated information. In addition, Appendix M-2 of the Draft EIR provides the fire access exhibit that shows the additional turnouts and turnarounds, as well as locations where the road would be upgraded to 24 feet.

LETTER NO. A10

California Department of Conservation
Geologic Energy Management Division
Amir Mohseni, Supervising Oil and Gas Engineer
Northern District
195 S. Broadway, Suite 101
Orcutt, CA 93455
CALGEMNORTHERN@CONSERVATION.CA.GOV

February 6, 2026 – *Note that this letter was received after the close of the public comment period. Nevertheless, responses have been provided below.*

Comment No. A10-1

PROJECT TITLE: SCH 2023110297 – AMERICAN JEWISH UNIVERSITY - CAMP ALONIM PROJECT

Public Resources Code (PRC) section 3208.1 establishes re-abandonment responsibility when previously plugged and abandoned oil, gas or geothermal wells will be impacted by planned property development or construction activities. Local permitting agencies, property owners, and/or developers should be aware of, and fully understand, that significant and potentially dangerous issues may be associated with development near previously abandoned oil, gas, and geothermal wells.

The California Geologic Energy Management Division (CalGEM) has received the above-referenced project, dated December 16, 2025. To assist local permitting agencies, property owners, and developers in making safe and practical land use decisions regarding potential development near oil, gas, or geothermal wells, CalGEM provides a table in the attached enclosure of the wells within the parcel boundary or in its vicinity, based on CalGEM's Well Finder database (https://maps.conservation.ca.gov/doggr/wellfinder/).

Response to Comment No. A10-1

The comment provides general introductory information, which is acknowledged for the record and which will be forwarded to the decision-making bodies for their review and consideration.

Comment No. A10-2

CalGEM categorically advises against building over, or in any way impeding access to, oil, gas, or geothermal wells. Impeding access to a well could result in the need to remove any structure or obstacle that prevents or impedes access including, but not limited to, buildings, housing,

fencing, landscaping, trees, pools, patios, sidewalks, roadways, and decking at the landowner's expense if there is a need to access a well. Maintaining sufficient access is considered the ability for a well servicing unit and associated necessary equipment (consisting of well servicing rig, pumping equipment, pipe trailer) to reach a well from a public street or access way, solely over the parcel on which the well is located. A well servicing unit, and any necessary equipment, should be able to pass unimpeded along and over the route, and should be able to access the well without disturbing the integrity of surrounding infrastructure. Impermeable barriers such as asphalt, concrete, and plastic may trap hazardous gases and liquids underneath and could create a safety hazard if built over a well that later develops a leak.

CalGEM recommends that any well for which access is impeded or built over, against CalGEM's advice, should be evaluated by a qualified petroleum professional for compliance with the statutory objectives of isolating all hydrocarbon-bearing strata; protecting underground and surface waters; prevention of subsequent damage to life, health, property, and other resources; and prevention of loss of oil, gas, or reservoir energy. CalGEM recommends that wells that do not meet these standards are abandoned or re-abandoned prior to construction. The well information can be accessed through CalGEM's Well Finder database mentioned above. PRC section 3208, subdivision (a), provides the primary statutory authority for CalGEM to oversee adequate abandonment of wells. Additionally, CalGEM has developed the regulatory guidance for operators to be followed during well abandonment, which are listed within California Code of Regulation, title 14 (CCR) section 1723 and associated sub-sections (for onshore wells), and section 1745 and associated sub-sections (for offshore wells).

Response to Comment No. A10-2

The comment includes general information from CalGEM regarding building over wells, but does not state a specific concern or questions regarding the adequacy of the analysis of environmental impacts contained in the Draft EIR. Nevertheless, the comment is acknowledged for the record, and will be forwarded to the decision-making bodies for their review and consideration. In addition, the Project does not propose to build over or otherwise impede access to oil, gas, or geothermal wells.

Comment No. A10-3

There is no guarantee that a well abandoned in compliance with current Division requirements as prescribed by law will not start leaking in the future. Due to the inability to predict all subsurface conditions or changes, it always remains a possibility that any well may start to leak oil, gas, and/or water after abandonment, no matter how thoroughly the well was plugged and abandoned. CalGEM acknowledges wells plugged and abandoned to the most current Division requirements as prescribed by law have a lower probability of leaking in the future, however there is no guarantee that such abandoned wells will not leak.

CalGEM advises that all wells identified on the development parcel prior to, or during, development activities be tested for liquid and gas leakage. Surveyed locations in Latitude and

Longitude, NAD 83 decimal format, and leak testing results should be provided to CalGEM. CalGEM expects any wells found leaking to be reported to CalGEM immediately.

PRC section 3208.1 gives CalGEM the authority to order or permit the re-abandonment of any well where it has reason to question the integrity of the previous abandonment. Responsibility for re-abandonment costs may be affected by the choices made by the local permitting agency, property owner, and/or developer in considering the general advice set forth in this letter. The PRC continues to define the person or entity responsible for re-abandonment as:

1. The property owner - If the well was plugged and abandoned in conformance with Division requirements at the time of abandonment, and in its current condition does not pose an immediate danger to life, health, and property, but requires additional work solely because the owner of the property on which the well is located proposes construction on the property that would prevent or impede access to the well for purposes of remedying a currently perceived future problem, then the owner of the property on which the well is located shall obtain all rights necessary to re-abandon the well and be responsible for the re-abandonment.

2. The person or entity causing construction over or near the well - If the well was plugged and abandoned in conformance with Division requirements at the time of plugging and abandonment, and the property owner, developer, or local agency permitting the construction failed either to obtain an opinion from the supervisor or district deputy as to whether the previously abandoned well is required to be re-abandoned, or to follow the advice of the supervisor or district deputy not to undertake construction that impedes access, then the person or entity causing the construction over or near the well shall obtain all rights necessary to re-abandon the well and be responsible for the re-abandonment.

3. The party or parties responsible for disturbing the integrity of the abandonment - If the well was plugged and abandoned in conformance with Division requirements at the time of plugging and abandonment, and after that time someone other than the operator or an affiliate of the operator disturbed the integrity of the abandonment in the course of developing the property, then the party or parties responsible for disturbing the integrity of the abandonment shall be responsible for the re-abandonment.

Should any wells require abandonment or re-abandonment, the responsible party must submit a Notice of Intention (NOI) to CalGEM through WellSTAR. The NOI form can be accessed in the 'Plugging and Abandonment' section of the following link: https://www.conservation.ca.gov/calgem/for_operators. No well work may be performed on any oil, gas, or geothermal well without written approval from CalGEM. Well work requiring approval includes, but is not limited to, mitigating leaking gas or other fluids from abandoned wells, modifications to well casings, and/or any other re-abandonment work. CalGEM also regulates the top of a plugged and abandoned well's minimum and maximum depth below final grade. CCR section 1723.5 states well casings shall be cut off at least 5 feet but no more than 10 feet

below the surface of the ground. If any well needs to be lowered or raised (i.e. casing cut down or casing riser added) to meet this regulation, a permit from CalGEM is required before work can start.

Response to Comment No. A10-3

Regarding the portion of the comment about wells on the development parcel, a Phase I Environmental Site Assessment (ESA) was prepared for the Project Site and is included in Appendix G of the Draft EIR. As discussed on Draft EIR page IV.J-13, the closest oil and gas well is a plugged dry hole approximately 2,600 feet northwest of the Project Site.

The remainder of the comment includes general information from CalGEM regarding well abandonment, but does not state a specific concern or questions regarding the adequacy of the analysis of environmental impacts contained in the Draft EIR. Nevertheless, the comment is acknowledged for the record, and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. A10-4

CalGEM makes the following additional recommendations to the local permitting agency, property owner, and developer:

1. To ensure that present and future property owners are aware of (a) the existence of all wells located on the property, and (b) potentially significant issues associated with any improvements near oil or gas wells, CalGEM recommends that information regarding the below identified well(s), and any other pertinent information obtained after the issuance of this letter, be communicated to the appropriate county recorder for inclusion in the title information of the subject real property.

2. CalGEM recommends that any soil containing hydrocarbons be disposed of in accordance with local, state, and federal laws. Please notify the appropriate authorities if soil containing significant amounts of hydrocarbons is discovered during development.

Response to Comment No. A10-4

The comment includes general recommendations from CalGEM, but does not state a specific concern or questions regarding the adequacy of the analysis of environmental impacts contained in the Draft EIR. Nevertheless, the comment is acknowledged for the record, and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. A10-5

As indicated in PRC section 3106, CalGEM has statutory authority over the drilling, operation, maintenance, and abandonment of oil, gas, and geothermal wells, and attendant facilities, to prevent, as far as possible, damage to life, health, property, and natural resources; damage to

underground oil, gas, and geothermal deposits; and damage to underground and surface waters suitable for irrigation or domestic purposes. In addition to CalGEM's authority to order work on wells pursuant to PRC sections 3208.1 and 3224, it has authority to issue civil and criminal penalties under PRC sections 3236, 3236.5, and 3359 for violations within CalGEM's jurisdictional authority. CalGEM does not regulate grading, excavations, or other land use issues.

If you have any questions, or if any wells are encountered that were not part of this letter, contact CalGEM at (805) 465-9623 or CalGEMNorthern@conservation.ca.gov.

Response to Comment No. A10-5

The comment provides general information about CalGEM's authority, but does not state a specific concern or questions regarding the adequacy of the analysis of environmental impacts contained in the Draft EIR. Nevertheless, the comment is acknowledged for the record, and will be forwarded to the decision-making bodies for their review and consideration.

Comment No. A10-6

Enclosure: The wells listed below are reported to be located within and nearby the parcel boundary and may have future access impeded.

API No.	Well Name
111-05666	"Well No." 1
111-05626	"Barndies" 1

Response to Comment No. A10-6

The comment provides information about nearby wells, but does not state a specific concern regarding the adequacy of the analysis of environmental impacts contained in the Draft EIR. Nevertheless, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration. In addition, as discussed in the Response to Comment No. A10-3, based on the Phase I ESA prepared for the Project Site, the closest oil and gas well is a plugged dry hole approximately 2,600 feet northwest of the Project Site. However, the Phase I ESA only addresses a portion of APN 685-0-051-040, focused on where Project construction activities would occur (Development Footprint), and not the larger 2,588-acre Subject Parcels (APNs 685-0-051-190, 685-0-051-210, 685-0-051-040, 685-0-051-050, 685-0-051-140).

LETTER NO. B1

Charles Lange
2678 Lakeshore Boulevard
Lakeport, CA 95453

December 5, 2023

Comment No. B1-1

To Whom It May Concern:

Please be advised that I am part owner of the 6.2 acre parcel located at 5586 Island Oak Street in the City of Simi Valley directly North of the above referenced Project. In this regard, it is absolutely imperative to the residents in the surrounding area of my property that they be given a legal secondary access in and out of the above referenced project for fire safety purposes in exchange for allowing the above referenced development any additional access through our neighborhoods. Presently, our neighborhood is only served by a single primary source of ingress and egress, failing to meet the current fire safety standards established for neighborhoods like ours. Any approval of the above referenced project could materially adversely affect our neighborhood's fire escape routes in the event of an emergency placing lives at risk. Therefore, the above referenced development must provide both itself as well as our neighborhood with a legal secondary access to meet current fire safety standards. It would be completely unacceptable to allow the scope of traffic potentially generated by the proposed development above without improving fire accessibility for both our neighborhood as well as for the American Jewish University

The owners of 5586 Island Oak Street have been waiting for many years to develop their property with only 21 additional homes added to the area. Based upon average per unit occupancy in the area pursuant to the most recent census data, such a development would only increase the population accessing the area by 60 people. Meanwhile, the American Jewish University is proposing a development that could increase traffic through our neighborhood by more than 1,000 people for a given event. It is inconceivable that such a development could be allowed without a fully legal reciprocal secondary access so that both our neighborhood as well as the American Jewish University can meet current fire safety standards.

Response to Comment No. B1-1

Regarding evacuation in the event of a fire, as discussed on Draft EIR pages IV.R-10 through IV.R-13, AJU currently hosts up to 300-person events and three concurrent summer camps, bringing over 700 visitors and staff to the campus at once. The requested Conditional Use Permit (CUP) would increase camp enrollment by 100 and allow up to 1,000-person events six

times per year. While this raises the statistical chance of a wildfire coinciding with an event, it would not alter the fundamental duties of emergency responders, who would still issue evacuation warnings or orders and access the site if necessary. As discussed in Section IV.M, Public Services – Fire, of the Draft EIR, AJU's Emergency Preparedness and Procedures Plan (included in Appendix L-1 of the Draft EIR) establishes command hierarchy, staff roles, communication protocols, and evacuation procedures, ensuring orderly responses. This includes procedures for a camp-wide evacuation of campers and staff by bus to the Rancho Santa Susana Recreation Center in Simi Valley as well as a plan to shelter in place if ordered to do so by the VCFD.

The facility has decades of experience managing events and coordinating traffic and may hire additional staff for parking without impairing emergency access. Evacuation from events consists of guests leaving the campus in their own vehicles through either the front security gate or through the back gate at the eastern end of the High Road to reach Los Angeles Avenue in Simi Valley. There is also a side gate on the Runkle side that can be used in case of emergency. Finally, similar to the plan to bus campers and staff off-site if needed, the same plan can be used if necessary to bus event attendees to an off-site location. Tapo Canyon Road and adjacent routes provide adequate capacity, and evacuation orders are managed by the Sheriff's Office of Emergency Services to avoid interference with emergency response. In the event of a fire starting on-site, AJU has the ability to control evacuation in an orderly fashion. If a fire threatens from off-site, evacuation would only occur under Sheriff's orders and with coordinated planning. Unlike a residential subdivision, the Project represents a seasonal use with limited occupancy, meaning potential wildfire-related evacuation impacts would be intermittent and manageable. Overall, the Project's expansion is not expected to substantially impair wildfire emergency response either on or off site.

The purpose of a secondary access is to provide an additional means of ingress or egress when the primary access is blocked by an emergency event. Primary and secondary access roads must be separated to ensure that both routes will not be obstructed by a single emergency. The camp's internal roads provide access to a gate at Hidden Ranch Drive, which exits through the Simi Valley Parker Ranch Project (File No. PD-S-895 / Tract 5164) onto Los Angeles Avenue. This route would only be used by the camp if the primary access road through the main gate at the end of Tapo Canyon Road is blocked.

At the time the Parker Ranch Project was deemed complete, projects in a Very High Fire Hazard Severity Zone and in a Local Responsibility Area did not need to provide secondary access if adequate emergency access roads existed. Parker Ranch uses three separate gated emergency access roads: one through the Project Site exiting to Tapo Canyon Road; one through a gate on Oak Knolls Road exiting to Katherine Road; and a third gate onto a flood control access road exiting onto Los Angeles Avenue. The camp will replace the gate at Hidden Ranch Drive to provide a dual keyed system for use by law enforcement and the fire department. This will provide the required secondary access for the camp's CUP, while maintaining the required emergency access road serving Parker Ranch / Tract 5164.

Therefore, the analysis contained in the Draft EIR concluded that the Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, and this impact would be less than significant.

The Project meets the requirement to provide secondary access by allowing for access through the back gate at the eastern end of the High Road to reach Los Angeles Avenue in Simi Valley (in addition to the primary access through the front security gate).

The portion of the comment requesting reciprocal secondary access for both the Project and the adjacent residential subdivision does not state a specific concern or question regarding the adequacy of the analysis of environmental impacts contained in the Draft EIR. Nevertheless, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

LETTER NO. B2

Ashley Holmes
P.O.A. for the Constance S. Holes Family Trust
Charles Lange
Donald W. Vander Horck
Loren J. Vander Horck
ASHOLMES1234@GMAIL.COM

September 25, 2024

Comment No. B2-1

RE: Case #PL22-0032 (Proposed Major Mod to CUP No. 1776)

According to the Subdivision Survey Report Dated November 30, 2021 (required pursuant to AB 2911), for the Hidden Park Subdivision - Subdivision I. D. 21- XVE-0558, this subdivision is in a Very High Fire Hazard Severity Zone and requires a Secondary Major Access Road for Ingress and Egress. In this regard, it is incumbent upon the local authorities at all levels to make any reasonable efforts to provide a Secondary Major Access for Ingress and Egress for the Hidden Park Subdivision. Under no circumstances should the American Jewish University - Camp Alonim Project Proposed Major Modification to the Conditional Use Permit be given any consideration unless the American Jewish University is required to provide a fully acceptable Secondary Major Access Road for the benefit of the Hidden Park Subdivision and the American Jewish University. The American Jewish University must not be permitted to add any additional traffic that might flow through the Hidden Park Subdivision in conjunction with its Proposed Major Modification to its Conditional Use Permit without providing a Secondary Major Access Road to serve both projects. Without such a fully approved Secondary Major Access Road serving both projects, the American Jewish University - Camp Alonim Project Proposed Major Modification to its Conditional Use Permit should be enjoined from further consideration until all of the Part III - Recommendations in the Hidden Park Subdivision Survey Report Dated November 30, 2021, are met in full.

Section 1270 and Section 1273 of the State Minimum Fire Safe Regulations, 2021 (14CCR) clearly requires that the Proposed Major Modification to the Conditional Use Permit of the American Jewish University be subject to the provisions requiring a Secondary Major Access Road. This would apply to its intended increase in traffic through its own campus as well as any intended increase in traffic through the Hidden Park Subdivision. In this regard, it reasonably clear that any approval of this Proposed Major Modification to the Conditional Use Permit of the American Jewish University would constitute a violation of existing law without providing for a Secondary Major Access Road to serve both areas materially impacted by increased traffic

particularly in view of the Very High Fire Hazard Severity Zone in which both projects are located.

The Hidden Park Subdivision must not be required to support any additional traffic from the American Jewish University -Camp Alonim Project Proposed Major Modification to its Conditional Use Permit under any circumstances without the creation of a Secondary Major Access Road, which the Hidden Park Subdivision could also use as Secondary Major Access Road for Ingress or Egress that would allow for safe evacuation in event of a major wildfire event. This could be accomplished by an approved Security Gate which swings in both directions allowed pursuant to Section 1273.03 (b). Such a solution would solve the Secondary Access Requirement for the American Jewish University as well as the Hidden Park Subdivision which is being materially adversely impacted by increased traffic directly attributable to the Proposed Major Modification to the Conditional Use Permit by the American Jewish University so that both developments could meet the requirements of AB 2911. It is clear under the law that the increased traffic through the Hidden Park Subdivision makes it mandatory for the American Jewish University to provide a two way means of Ingress and Egress that meets current Secondary Access Requirements for both projects. The material increase in fire hazard to the Hidden Park Subdivision must be mitigated under the law in conjunction with the approval of the Major Modification of the Conditional Use Permit presently requested by the American Jewish University.

The primary purpose of AB 2911 is too provide regular evaluations every 5 years of subdivisions within Very High Fire Hazard Severity Zones such as the Hidden Park Subdivision with clear recommendations for bringing such subdivisions into compliance with greater fire safety. As stated above, the Subdivision Survey Report Dated November 30, 2021, for the Hidden Park Subdivision specifically states that a Secondary Major Access Road for Ingress and Egress is required for the Hidden Park Subdivision without the addition of significantly increased fire hazard directly attributable to the Proposed Major Modification to the Conditional Use Permit by the American Jewish University. Permitting the increased traffic and fire hazard risk to the residents of the Hidden Park Subdivision would be irresponsible without mandating a requirement for a Secondary Major Access Road that can serve both the American Jewish University and the Hidden Park Subdivision. In this regard, we wholeheartedly agree with the intent of AB 2911 Section 4290.5 (a), (b), (c), (d), (e) and CCR 14, Sections 1267.00, 1267.01, 1267.02 and 1267.03 which strongly recommends that CalFire requires a Secondary Major Access Road for Ingress or Egress for the Hidden Park Subdivision before any additional traffic or fire risk is permitted to occur as a result of the Proposed Major Modification to the Conditional Use Permit by the American Jewish University.

Response to Comment No. B2-1

Regarding evacuation in the event of a fire, refer to the Response to Comment No. B1-1.

The portion of the comment requesting reciprocal secondary access for both the Project and the Hidden Park subdivision does not state a specific concern or question regarding the adequacy

of the analysis of environmental impacts contained in the Draft EIR. Nevertheless, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

LETTER NO. B3

Enso Verde
Zen-Inspired Senior Living In Ventura County
Paul Kuenstner, Board Chair
PKUENSTNER@ICLOUD.COM

January 29, 2026

Comment No. B3-1

To whom it may concern,

We are pleased to support project application for Modification of CUP 1776 for the Brandeis Bardin Campus in Simi Valley. The project is County File Number PL22-0032, and the State Clearinghouse Number is 2023110297. The Project Description is following this letter.

Kendal at Ventura owns the 20-acre property on the southwest corner of Tapo Canyon Road and Guardian Street, adjacent to the Brandeis-Bardin Campus. This property is the "Endo Verde" project, a planned senior living community. We support American Jewish University's Brandeis- Bardin campus and the planned improvements.

Should you have any questions, I can be reached at 617-548-3828 or at pkuenstner@icloud.com

Response to Comment No. B3-1

The comment provides the commenter's support for the Project, which is acknowledged for the record and which will be forwarded to the decision-making bodies for their review and consideration.

3. ADDITIONS AND CORRECTIONS

In accordance with the California Environmental Quality Act (CEQA) Guidelines Section 15132(a), this section of the Final Environmental Impact Report (EIR) provides changes to the Draft EIR that have been made to revise, clarify, correct, or supplement the environmental impact analysis for the American Jewish University – Camp Alonim Project (the Project). These changes and additions are due to recognition of inadvertent errors or omissions, and to respond to comments received on the Draft EIR during the public review period. The changes described in this section do not add significant new information to the Draft EIR that would require recirculation of the Draft EIR. More specifically, CEQA requires recirculation of a Draft EIR only when "significant new information" is added to a Draft EIR after public notice of the availability of the Draft EIR has occurred (refer to California Public Resources Code Section 21092.1 and CEQA Guidelines Section 15088.5), but before the EIR is certified. Section 15088.5 of the CEQA Guidelines specifically states: "New information added to an EIR is not 'significant' unless the EIR is changed in a way that deprives the public of meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible alternative) that the project's proponents have declined to implement. 'Significant new information' requiring recirculation includes, for example, a disclosure showing that:

- A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
- A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted to reduce the impact to a level of insignificance.
- A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it.
- The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded."

CEQA Guidelines Section 15088.5 also provides that "[re]circulation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR…A decision not recirculate an EIR must be supported by substantial evidence in the administrative record."

As demonstrated in this Final EIR, the changes presented in this section do not constitute new significant information warranting recirculation of the Draft EIR as set forth in CEQA Guidelines Section 15088.5. Rather, the Draft EIR is comprehensive and has been prepared in accordance with CEQA.

Changes to the Draft EIR are indicated under the respective EIR section heading, page number, and paragraph. Deletions are shown with ~~strikethrough~~ and additions are shown with **bolded underline**.

Section I. Introduction/Summary

Updated versions of Mitigation Measures BIO-7, BIO-8, BIO-10, BIO-13, and FIRE-1 have been provided below. The same changes are made to these mitigation measures in Table I-1, which begins on page I-7.

Section II. Project Description

No additions or corrections are required.

Section III. Environmental Setting

No additions or corrections are required.

Section IV.A. Impacts Found to be Less Than Significant

No additions or corrections are required.

Section IV.B. Aesthetics (Scenic Resources)

No additions or corrections are required.

Section IV.C. Agricultural Resources

No additions or corrections are required.

Section IV.D. Air Quality

No additions or corrections are required.

Section IV.E. Biological Resources

The following discussion at the bottom of page IV.E-7 is revised as follows:

ix) Waters and Wetlands Regulations

Numerous agencies control what can and cannot be done in or around streams and wetlands. If a project affects an area where water flows, ponds, or is present even part of the year, it is likely to be regulated by one or more agencies. Many wetland or stream projects will require three main permits or approvals (in addition to CEQA compliance). These are:

- 404 Permit (U.S. Army Corps of Engineers)

- 401 Certification (California Regional Water Quality Control Board)
- Streambed Alteration Agreement (California Department of Fish and Game)

Additionally, work within a "redline" watercourse under the jurisdiction of the Ventura County Watershed Protection District would be subject to a Watercourse Permit. **Finally, the Los Angeles Regional Water Quality Control Board has jurisdiction over ephemeral waters (including those located on the Project Site). See also Section IV.K, Hydrology and Water Quality, for a complete discussion of the authority of the Los Angeles Regional Water Quality Control Board.**

Mitigation Measure MM-BIO-7, which starts on page IV.E-60, is revised as follows:

MM-BIO-7: Crotch's Bumble Bee Habitat Assessment, Protocol Surveys, and Take Avoidance

Purpose: To identify suitable habitat where Project activities are most likely to impact Crotch's bumble bees and avoid direct impacts to individuals.

Requirement: A County-approved qualified biologist shall conduct a habitat assessment survey within one year prior to the start of vegetation removal and/or ground-disturbing activities to determine if the Project Construction Footprint contains habitat suitable to support Crotch's bumble bees. If suitable habitat is present, the qualified biologist shall assess presence of foraging and nesting Crotch's bumble bees by conducting protocol surveys consistent with **CDFW's** ~~the~~ Survey Considerations for California Endangered Species Act Candidate Bumble Bee Species. **Focused surveys shall also be conducted throughout the entire Project area and during the appropriate flying season (April to August) to ensure no missed detection of Crotch's bumble bee occurs.** Surveys for Crotch's bumble bee shall be conducted every year that Project activities will occur, as bumble bees are known to move their nests each year. **The pre-construction surveys shall be conducted prior to ground-disturbing activities.** ~~If Crotch's bumble bees are documented using areas within the Project Construction Footprint for foraging, nesting, and/or overwintering, Project proponent shall consult CDFW for recommended take avoidance measures, which may include buffer zones to avoid disturbing any nests and/or on-going biological monitoring during vegetation removal, prior to the start of ground disturbing activities.~~

If Crotch's bumble bees are not detected during the pre-construction surveys but suitable habitat is present, a qualified biologist shall be present during ground-disturbing project activities that occur during the Crotch's bumble bee colony active period, to ensure that no impacts occur to a previously unidentified Crotch's bumble bee nest. No additional work restrictions with regard to Crotch's bumble bee shall be implemented for the remainder of the colony active period. If Crotch's bumble bees are detected, ground-disturbing activities shall be prohibited within 100 feet of any known,

occupied Crotch's bumble bee nest, or as determined by the qualified biologist with approval of CDFW, who shall demarcate the approved buffer via flagging. If any individual Crotch's bumble bee or a Crotch's bumble bee nest that cannot be avoided is found on a project site, the applicant will obtain an Incidental Take Permit from CDFW for impacts to this species. Work shall not resume in this area for the duration of the Crotch's bumble bee colony active period, unless concurrence from CDFW has been granted.

Documentation: The qualified biologist shall prepare a report documenting the results of the survey(s), including a map depicting locations of the suitable habitat, and any individuals or nests observed. The report shall be submitted to the County and CDFW prior to initiation of ground-disturbing activities.

Timing: The habitat assessment survey and any required protocol surveys for presence shall be conducted within one year prior to the start of ground-disturbing activities, and each year that Project activities will occur. Survey results shall be submitted to CDFW prior to the initiation of ground disturbing Project activities.

Monitoring and Reporting: If Crotch's bumble bees are documented using Project areas for foraging, nesting, and/or overwintering, or presence of the species is assumed based on the presence of suitable habitat, Project proponent will consult CDFW for recommended avoidance measures prior to the start of ground disturbing activities.

Mitigation Measure MM-BIO-8, which begins on page IV.E-61, is revised as follows:

MM-BIO-8: Nighttime Bat Surveys

Purpose: To avoid impacts to bats that may occur within and adjacent to the Construction Footprint.

Requirement: A qualified bat specialist, approved by the County, shall conduct a nighttime survey to identify bat species, habitat usage, and roost locations within or adjacent to the Project Construction Footprint. The nighttime emergence survey should occur on a warm, dry night, when predicted nighttime lows are not less than 45˚F. The survey shall begin 30 minutes prior to the time of sunset and continue until one hour after sunset. During the nighttime survey, the bat biologist shall inspect each tree in and within a 100-foot buffer of the Development Footprint. All trees shall be examined and categorized on the basis of their suitability as day or maternity roosting habitat. Depending on the locations of roosts and number of roost exits, multiple surveyors may be required. The bat biologist and team of surveyors shall conduct acoustic surveys, aided by acoustic recognition technology (e.g., AnaBat or similar) during the nighttime survey. The length and extent of acoustic surveying depends on the time of year and target species. Acoustic monitoring nighttime surveys should be conducted for at least 3 nights in the summer and up to 10 nights in the winter to confirm

absence. Visual surveys shall be conducted at the time of emergence with high quality night vision goggles (Generation 3+) and bat detectors. Several surveyors at multiple vantage points may be required to ensure adequate visual coverage, especially around large trees. Surveyors shall station themselves such that roost exit points are backlit with the sky and that their survey areas do not overlap. The visual survey shall start at sunset and continue for at least 75 minutes, as roosting bats do not all emerge simultaneously. **Only qualified bat specialists with appropriate handling permits will be permitted to handle bats.**

Documentation: The bat biologist conducting nighttime surveys shall provide to the County and CDFW a report of survey results, including any species detected and a map of identified roost sites. Nighttime surveys shall be timed to allow species identification and the development of an appropriate Bat Avoidance and Protection Plan (BAPP), provided for formally in MM-BIO-10, below.

Timing: Nighttime surveys shall be timed to allow species identification and the development of an appropriate BAPP prior to the commencement of Project activities.

Exclusion approaches for foliage-roosting bats potentially impacted by Project activities should begin within 2 months before the start of ground-disturbing activities and/or tree limbing or removal.

Monitoring and Reporting: The County shall review the BAPP (formally required in MM-BIO-10) and ensure that all applicable mitigation measures are implemented prior to, during, and post-completion of Project activities, as required. If the installation of alternative habitat is required to offset the loss of roosting sites, a qualified biologist shall monitor the alternative habitat for the duration recommended in the BAPP.

Mitigation Measure MM-BIO-10, which is provided on page IV.E-63, is revised as follows:

MM-BIO-10: Bat Avoidance and Protection Plan

Purpose: To avoid impacts to bats that may occur within and adjacent to the Construction Footprint.

Requirement: If the visual and acoustic surveys (described in Mitigation Measures MM-BIO-8 and MM-BIO-9) are positive for the presence of bats, the bat biologist shall prepare a Bat Avoidance and Protection Plan (BAPP). Depending on the bat species present and roost locations, the plan may include the following elements:

- Required pre-construction surveys and monitoring
- Timing considerations for temporal avoidance (e.g., outside of the maternity season, May 1 - August 15, if the project may potentially impact a maternity roost or non-flying juvenile bats)

- Humane relocation and exclusion methods to remove and/or exclude bats from roosting sites within structures or vegetation slated for removal

- **If bats are found to be present during construction, all construction activities will be halted until the County approved biologists determines that all bats have left the construction site and that Project activities may be resumed**

- Protective fencing or signage to avoid impacts to potential roosting habitat that shall remain on site

- Best Management Practices for minimizing the effects of noise, human activity, dust, lighting, and ground vibrations on bats

- On and/or off-site mitigation measures to compensate for lost roosting habitat, including installation of alternative roosting habitat **sufficient to ensure a no net loss of habitat and/or roosting sites**

- Mitigation monitoring to evaluate the effectiveness of bat-related mitigation

Documentation: Preparation of the BAPP by a County-approved biologist.

Timing: The BAPP shall be submitted to the Planning Division prior to the issuance of a grading permit. The measures identified in the BAPP shall be implemented in accordance with the timeframes identified in the BAPP.

Monitoring and Reporting: The County shall review the BAPP and ensure that all applicable mitigation measures are implemented prior to, during, and post-completion of Project activities, as required. If the installation of alternative habitat is required to offset the loss of roosting sites, a qualified biologist shall monitor the alternative habitat for the duration recommended in the BAPP.

Mitigation Measure MM-BIO-13, which begins on page IV.E-66, is revised as follows:

MM-BIO-13: Special Status Reptile Avoidance, Protection, and Relocation Plan

Purpose: To avoid impacts to coastal whiptail, coast horned lizard, and California legless lizards that may occur within and adjacent to the Construction Footprint.

Requirement: A County-approved qualified biologist shall develop a relocation plan for coastal whiptail, coast horned lizard, and California legless lizard **if the species is not able to be passively ushered out of harm's way to an area that is unaffected by the Project**. At a minimum, the relocation plan shall include the following elements:

- Timing and location of focused surveys that shall be conducted for each species, with greater survey effort allotted to locations with the highest quality habitat and/or greatest potential for impacts

- Habitat and conditions of proposed relocation sites in nearby, undisturbed areas

- Protocols for trapping and relocating individuals of each species

- Protocols for documenting and reporting the number of individuals/species relocated

If the Project results in permanent impacts on documented habitat for these species, compensatory mitigation for the affected species at a **minimum 2:1** ~~1:1~~ ratio shall be required. Compensatory mitigation may include on and/or off-site restoration or enhancement of suitable habitat. Depending on the vegetation communities impacted, impacted habitat for special status reptiles may be mitigated through implementation of a standalone mitigation and monitoring plan, or through inclusion in a larger habitat mitigation and monitoring plan developed for the entire Project (refer to Mitigation Measure MM-BIO-19 [Development and Implementation of a Habitat Restoration and/or Replacement Plan]).

Documentation: The relocation plan shall be submitted to the County and CDFW for approval at least 60 days prior to any ground disturbing activities within potentially occupied habitat. The qualified biologist shall prepare a report documenting the relocation survey results and site clearance activities. The original and final locations of any special status reptile relocations shall be recorded and mapped.

Timing: During the recognized activity period of the special-status reptiles (March-November), a qualified biologist shall conduct at least three relocation surveys beginning thirty days prior to the start of construction. If construction occurs during the period of low activity for these species (December to February), the surveys shall be conducted prior to this period and exclusion fencing shall be placed around the construction impact areas to limit recolonization of the site.

A qualified biologist shall be present during the course of the ground-disturbing activities within or adjacent to suitable coastal scrub, oak woodland, and riparian habitat, and shall conduct clearance surveys for special status reptiles prior to the start of construction each day.

Monitoring and Reporting: The qualified biologist shall report the results of the relocation surveys to the County and CDFW. Monitoring of on- or off-site compensatory mitigation shall be conducted at least annually for five years following initial mitigation implementation to track the 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 (refer to Mitigation Measure MM-BIO-18 [Development and Implementation of a Habitat Restoration and/or Replacement Plan]).

Section IV.F. Cultural Resources

No additions or corrections are required.

Section IV.G. Energy

No additions or corrections are required.

Section IV.H. Geology and Soils

No additions or corrections are required.

Section IV.I. Greenhouse Gas Emissions

No additions or corrections are required.

Section IV.J. Hazards and Hazardous Materials

The last paragraph on page IV.J-3 is deleted as it is not applicable to the Project:

~~***vi) Uniform Fire Code***~~

~~The Uniform Fire Code (UFC), Article 80 (UFC Section 80.103 as adopted by the State Fire Marshal pursuant to HSC Section 13143.9), includes specific requirements for the safe storage and handling of hazardous materials. These requirements are intended to reduce the potential for a release of hazardous materials and for mixing of incompatible chemicals, and specify the following specific design features to reduce the potential for a release of hazardous materials that could affect public health or the environment:~~

- ~~Separation of incompatible materials with a noncombustible partition;~~
- ~~Spill control in all storage, handling, and dispensing areas; and~~
- ~~Separate secondary containment for each chemical storage system. The secondary containment must hold the entire contents of the tank, plus the volume of water needed to supply the fire suppression system for a period of 20 minutes in the event of a catastrophic spill.~~

Section IV.K. Hydrology and Water Quality

No additions or corrections are required.

Section IV.L. Noise

No additions or corrections are required.

Section IV.M. Public Services

The second full paragraph on page IV.M-2 is revised as follows:

ii) Ventura County Fire Code

~~The Ventura County Fire Code, adopted via Ventura County Fire Protection District Ordinance No. 32, formally references and adopts the 2022 California Fire Code together with specified appendices and portions of the 2021 International Fire Code, plus portions of Title 19 of the California Code of Regulations.[1]~~ **Ventura County Fire Protection District (VCFPD) adopted Ordinance 32, updating Chapter 49 of the Fire Code (effective January 1, 2023), which incorporates local amendments to California's State Fire Code / International Fire Code with stricter requirements for defensible space, fuel modification, landscaping, and vegetation management.** Because of Ventura County's local climatic, topographic, and wildfire risk conditions, the County includes more restrictive amendments than the State Code in certain areas, particularly regarding fire protection systems, fire apparatus access, wildland-urban interface (WUI) requirements, defensible space, fuel modification and vegetation management, emergency power for fire water systems, and requirements for new construction and additions in fire hazard zones. These local amendments are enabled by the State Health & Safety Code, which allows jurisdictions to impose stricter standards when reasonably necessary. ~~The adopted Ventura County Fire Code took effect January 1, 2023, aligning with the State's triennial code update cycle.~~

The first four full paragraphs on page IV.M-3 are revised as follows:

a) Existing Conditions

The Ventura County Fire Department (VCFD) was created in 1928. Originally formed to serve the unincorporated county, it now provides fire protection services to the unincorporated areas of the county and ~~6~~**7** of the 10 incorporated cities: Thousand Oaks, Simi Valley, Moorpark, Camarillo, Port Hueneme, **Santa Paula,** and Ojai. VCFD response area covers 848 square miles, out of the 1,843 total square miles that make up the county and serves a population of more than 480,000.

VCFD provides a range of programs and services aimed at protecting lives and property of the people of Ventura County from the adverse effects of fires, sudden medical emergencies, exposure to hazardous materials, or other dangerous conditions. These programs include fire protection planning, fire prevention education, fire law and code enforcement, fire suppression and recovery, first responder level emergency medical services, and assistance and support for other non-fire emergencies such as floods, earthquakes, and other disasters.

~~[1] Although Ventura County Fire Protection District has since adopted Ordinance No. 34, which adopts by reference the 2025 California Fire Code, effective January 1, 2026, the Project is currently subject to the 2022 code.~~

The County of Ventura Board of Supervisors acts as the Board of Directors for VCFD. The Fire Chief is appointed by the Supervisors. VCFD is divided into five bureaus: Administrative Services, Business Services, Support Services, Emergency Services, and Fire Prevention. VCFD includes five Battalions and several specialized units. Battalion 4 primarily serves within the cities of Moorpark and Simi Valley, including the Project Site. The stations in Battalion 4 include 40, 41, 42, 43, 44, 45, 46, and 47.

Each fire station has a staffed fire engine **and some stations have rescue ambulances and paramedics**; strategic stations (Stations 30, 41 and 54) also have a staffed fire truck, with specific tools to perform responsibilities including forcible entry, search and rescue, clearing smoke and gas from a building, and turning off utility services.

The last full paragraph above "Mitigation Measures" on page IV.M-5 is revised as follows:

Also, the Project Applicant would be required to submit Project plans to the VCFD for review to ensure compliance with all applicable fire code, standards, and guidelines. The VCFD has conducted a preliminary review of the Project plans requires site improvements based on the inability to meet full width (24 feet) for the access road that are included as Mitigation Measure MM-FIRE-1 provided below. **However, and as provided in Mitigation Measure MM-FIRE-1, High Road will be widened, where possible, to 24 feet with turnouts and turnarounds for emergency vehicles.** Through compliance with existing regulations, as well as the implementation of Mitigation Measure MM-FIRE-1, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection services. Therefore, Project impacts related to fire protection services would be less than significant.

Mitigation Measure MM-FIRE-1 on page IV.M-5 is revised as follows:

MM-FIRE-1 Site Improvements to Mitigate Fire Risk

Purpose: To minimize risk to the Project as a result of a fire.

Requirement: The Project shall incorporate the following site improvements:

- All gates shall be retrofitted to allow exiting without keys, codes, or special knowledge.
- Electric gates shall be retrofitted with an auto-exit loop sensor.
- Defensible zones shall be increased to 200 feet from buildings (normally 100 feet) and 25 feet along the roads (normally 10 feet).
- All existing buildings shall be required to meet the following defensible space standards:
  - Zone 0 (5-foot non-combustible zone).

- Extended fuel reduction/thinning zones to 200 feet from buildings.
- The 25-foot road clearance shall apply to the High Road from the main entrance to Hidden Ranch Drive.
- **Additional road widening of High Road where possible to 24 feet with turnouts and turnarounds for emergency vehicles (as shown on the fire access exhibit included in Appendix M-2).**

Documentation: The improvements required by this measure shall be depicted on a site plan.

Timing: The site plan showing the site improvements required by this measure shall be submitted to and approved by the Planning Division and Ventura County Fire Department prior to issuance of a Zoning Clearance.

Monitoring and Reporting: The Permittee shall submit the site plan showing the site improvements required by this measure to the Planning Division and the Ventura County Fire Department for review and approval to assure compliance with the requirements of this condition prior to issuance of a Zoning Clearance for construction. The Planning Division maintains copies of the site plan provided by the Permittee in the Project file.

Section IV.N. Recreation

No additions or corrections are required.

Section IV.O. Transportation

No additions or corrections are required.

Section IV.P. Tribal Cultural Resources

No additions or corrections are required.

Section IV.Q. Utilities and Service Systems

No additions or corrections are required.

Section IV.R. Wildfire

The first full paragraph on page IV.R-1 is revised as follows:

a) Federal

The Project Site is located within a State Responsibility Area (SRA) for purposes of fire protection (i.e., an area where the state government is responsible for wildfire protection), and therefore, federal wildfire regulations do not apply to the Project Site or within the immediate area. ~~The Federal National Incident Management System (NIMS) provides a shared vocabulary, systems,~~

~~and processes to prevent, protect against, mitigate, respond to and recover from disaster, and is relevant should a wildfire event become extraordinary and require federal support. NIMS is intended to standardize response to emergencies involving multiple jurisdictions or multiple agencies and is complementary to the State Standardized Emergency Management System (SEMS). Both systems utilize the Incident Command System (ICS) as their core field operations protocol so that all parties are essentially speaking the same language.~~

The discussion at the bottom of page IV.R-1 and top of page IV.R-2 is revised as follows:

b) State

i) California Fire Code

As mentioned above, the Project Site is located within an SRA for purposes of fire protection (i.e., an area where the state government is responsible for wildfire protection). The California Fire Code (CFC), Part 9 of Title 24 of the California Code of Regulations (CCR), establishes statewide regulations for fire prevention, fire protection, and life safety in buildings and on properties. The CFC sets standards for ~~building access,~~ fire flow, fire protection systems, hazardous materials management, emergency planning, and other practices designed to minimize the risk of fire and ensure effective emergency response. Local fire departments, such as the Ventura County Fire Department (VCFD), enforce the code and may adopt more stringent amendments tailored to local conditions, including requirements for fire hydrant placement, water supply, fire lanes, and defensible space.

California has also adopted Part 7 of the California Building Standards Code, known as the California Wildland-Urban Interface (WUI) Code, which complements the CFC by focusing specifically on areas where development meets or intermingles with wildland vegetation. The WUI Code requires ignition-resistant construction materials, ember-resistant vents, and defensible space measures to reduce wildfire risks. Together, the CFC and WUI Code provide a comprehensive framework for fire protection: the CFC establishes fire prevention and emergency response requirements, while the WUI Code strengthens building and site resilience in high fire hazard areas. **Within the County, the Department of Building and Safety enforces Part 7 of the WUI Code.**

The last full paragraph on page IV.R-5 is revised as follows (to remove the footnote):

iii) Ventura County Fire Code

Ventura County Fire Protection District (VCFPD) adopted Ordinance 32, updating Chapter 49 of the Fire Code (effective January 1, 2023), which incorporates local amendments to California's State Fire Code / International Fire Code with stricter requirements for defensible space, fuel modification, landscaping, and vegetation management. Key provisions include requiring a 100-foot defensible space around structures in SRAs, Very High Fire Hazard Severity Zones, or

designated Wildland-Urban Interface (WUI) areas.[2] The landscaping around new buildings and major landscape revisions must come with landscape and fuel modification plans that delineate zones and specify plant types, irrigation, and maintenance. Under the amendments, there's no "grandfathering" for existing defensible space zones unless state law or the Code explicitly allows it; existing properties may need to retrofit vegetation, spacing, and fuel loading to comply. Other enhancements include tightening rules around combustible materials (e.g. decks, wood piles, mulch) in close zones, building setbacks, and requirements for fencing near structures in WUI areas. These amendments reflect VCFD's effort to reduce wildfire risk, improve ember resilience, protect fire-fighting access, and ensure property owners maintain fuel conditions that reduce fire spread risk.

The following discussion at the bottom of page IV.R-11 and the top of page IV.R-12 is revised as follows:

Peppertree Lane, a private road, provides access to the camp. Peppertree Lane is the southern continuation of Tapo Canyon Road, a major thoroughfare in Simi Valley. All camp traffic is routed through a security gate where Peppertree Lane begins. Within the camp, Peppertree Lane splits into the "Low Road," which follows along the east side of the creek through the center of the camp, and the "High Road," which skirts along the hillside at the edge of the camp's developed area. As part of the Project, traffic associated with Camp Alonim would be directed along the High Road to the new Welcome Center parking lot. This routing would help to avoid interference with camp activities and conflicts with campers crossing the road to access facilities. In an emergency that impairs the primary access at the front security gate, evacuees would use a secondary egress point at the eastern end of the High Road to reach Los Angeles Avenue in Simi Valley via Hidden Ranch Drive. The VCFD requires turnouts be added to the access road (i.e., Peppertree Lane and the High Road) between Tapo Canyon Road and the proposed Welcome Center. Additionally, the VCFD has preliminarily reviewed the Project plans and requires additional site improvements based on the inability to meet full width (24 feet) for the access road that are outlined in Mitigation Measure MM-FIRE-1 included in Section IV.M, Public Services – Fire, of this Draft EIR. (**However, and as provided in Mitigation Measure MM-FIRE-1, High Road will be widened, where possible, to 24 feet with turnouts and turnarounds for emergency vehicles.)** These improvements include:

- All gates shall be retrofitted to allow exiting without keys, codes, or special knowledge.
- Electric gates shall be retrofitted with an auto-exit loop sensor.
- Defensible zones shall be increased to 200 feet from buildings (normally 100 feet) and 25 feet along the roads (normally 10 feet).

~~[3] VCFPD adopted Ordinance 34, which updates the 2025 California Fire Code, effective January 1, 2026. However, because the applicant has submitted plans for plan check prior to this date, the 2022 California Fire Code that was adopted under Ordinance 32 will apply.~~

- All existing buildings shall be required to meet the following defensible space standards:
  - Zone 0 (5-foot non-combustible zone).
  - Extended fuel reduction/thinning zones to 200 feet from buildings.
- The 25-foot road clearance shall apply to the High Road from the main entrance to Hidden Ranch Drive.
- **Additional road widening of High Road where possible to 24 feet with turnouts and turnarounds for emergency vehicles (as shown on the fire access exhibit included in Appendix M-2).**

The discussion under Impact WF-3 on page IV.R-14 is revised as follows:

As described above, as part of the Project, the VCFD requires that the access road (i.e., Peppertree Lane and the High Road) include turnouts between Tapo Canyon Road and the Welcome Center. Additionally, the VCFD has preliminarily reviewed the Project plans and requires additional site improvements based on the inability to meet full width (24 feet) for the access road that are outlined in Mitigation Measure MM-FIRE-1 included in Section IV.M, Public Services – Fire, of this Draft EIR. These improvements are described above. **However, and as provided in Mitigation Measure MM-FIRE-1, High Road will be widened, where possible, to 24 feet with turnouts and turnarounds for emergency vehicles.** Beyond these improvements, the Project would not require the installation or maintenance of new infrastructure that may exacerbate fire risks or result in other impacts to the environment. Therefore, Project impacts related to this issue would be less than significant.

Section V. Alternatives to the Project

No additions or corrections are required.

Section VI. Other CEQA Considerations

No additions or corrections are required.

Section VII. Acronyms and Abbreviations

No additions or corrections are required.

Section VIII. Preparers of the EIR

No additions or corrections are required.

4. MITIGATION MONITORING PROGRAM

4.1 INTRODUCTION

This Mitigation Monitoring Program ("MMP") has been prepared pursuant to Public Resources Code Section 21081.6, which requires a Lead Agency to adopt a "reporting or monitoring program for changes to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment." In addition, Section 15097(a) of the State CEQA Guidelines requires that a public agency adopt a program for monitoring or reporting mitigation measures and project revisions, which it has required to mitigate or avoid significant environmental effects. This MMP has been prepared in compliance with the requirements of CEQA, Public Resources Code Section 21081.6 and Section 15097 of the State CEQA Guidelines.

The Ventura County Resource Management Agency is the Lead Agency for the Project and therefore is responsible for administering and implementing the MMP. A public agency may delegate reporting or monitoring responsibilities to another public agency or to a private entity that accepts the delegation; however, until mitigation measures have been completed, the Lead Agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the program.

An Environmental Impact Report (EIR) has been prepared to address the potential environmental impacts of the Project. The evaluation of the Project's impacts in the EIR applies mitigation measures (MMs) needed to avoid or reduce potentially significant environmental impacts. This MMP is designed to monitor implementation of the MMs identified for the Project.

4.2 ADMINISTRATIVE PROCEDURES AND ENFORCEMENT

This MMP shall be enforced throughout all phases of the Project. The Applicant shall be responsible for implementing each MM and shall be obligated to provide certification, as identified below, to the appropriate monitoring and enforcement agencies that each MM has been implemented. The Applicant shall maintain records demonstrating compliance with each MM. Such records shall be made available to the County upon request.

4.3 PROGRAM MODIFICATION

After review and approval of the final MMP by the Lead Agency, minor changes and modifications to the MMP are permitted, but can only be made subject to County approval. The Lead Agency, in conjunction with any appropriate agencies or departments, will determine the adequacy of any

proposed change or modification. This flexibility is necessary in light of the nature of the MMP and the need to protect the environment. No changes will be permitted unless the MMP continues to satisfy the requirements of CEQA, as determined by the Lead Agency.

The Project shall be in substantial conformance with the MMs contained in this MMP. The enforcing departments or agencies may determine substantial conformance with MMs in the MMP in their reasonable discretion. If the department or agency cannot find substantial conformance, a MM may be modified or deleted as follows: the enforcing department or agency, or the decision maker for a subsequent discretionary project related approval finds that the modification or deletion complies with CEQA, including CEQA Guidelines Sections 15162 and 15164, which could include the preparation of an addendum or subsequent environmental clearance, if necessary, to analyze the impacts from the modifications to or deletion of the MMs. Any addendum or subsequent CEQA clearance shall explain why the MM is no longer needed, not feasible, or the other basis for modifying or deleting the MM, and that the modification will not result in a new significant impact consistent with the requirements of CEQA. Under this process, the modification or deletion of a MM shall not, in and of itself, require a modification to any Project discretionary approval unless the Planning Director also finds that the change to the MM results in a substantial change to the Project or the non-environmental conditions of approval.

4.4 MITIGATION MONITORING PROGRAM

IV.B. Aesthetics

None required.

IV.C. Agricultural Resources

None required.

IV.D. Air Quality

None required.

IV.E. Biological Resources

MM-BIO-1: Catalina Mariposa Lily (*Calochortus catalinae*) Protection Plan

Purpose: To avoid potentially significant impacts to the California Mariposa Lily, which is a special-status plant species.

Requirement: A County-approved biologist shall conduct spring botanical surveys (March-May) prior to the start of ground-disturbing activities to map the extent of above-ground plants within the Project Construction Footprint to confirm the extent of the population and flag the areas for protective fencing. The Catalina mariposa lilies exist entirely within the expanded

Fuel Modification Zone. Therefore, based on the overlap of Project activities, the biologist shall create a Protection Plan to prevent Project impacts on the lilies. If impacts cannot be avoided, a restoration plan to mitigate Project impacts shall be required. The Protection Plan shall include the installation of temporary construction exclusionary protective fencing around the observed extent of aboveground lilies plus a buffer of five feet, or as otherwise appropriate as determined by the biologist, of additional potential suitable habitat. Permanent wildlife permeable fencing shall be installed to prevent long-term impacts of increased human foot traffic to and from the proposed cabin development, as well as short-term impacts of construction activities. Permanent fencing or barriers shall be installed to prevent long-term impacts of increased human foot traffic to and from the proposed cabins.

To minimize impacts of required brush clearance activities, the Protection Plan shall include retaining patches of Catalina mariposa lilies within a fuel mosaic zone to the maximum extent practicable while complying with applicable fire protection standards for fuel modification (refer to Mitigation Measure MM-BIO-3 [Fuel Modification Plan]). A long-term maintenance and management protocol shall also be established.

Documentation: A Protection Plan prepared by a County-approved biologist.

Timing: The qualified biologist shall survey for California 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 Plan shall be approved by the County prior to the start of Project activities. Pre-construction surveys shall occur 3 to 7 days before clearing, grubbing, and grading activities occur.

Monitoring and Reporting: The biologist shall conduct spring surveys and record locations of specimens. Site monitoring during subsequent springs shall be necessary to determine progress of any on-site mitigation areas.

The Permittee shall submit the Protection Plan to the Planning Division for review and approval to assure compliance with the requirements of this condition prior to issuance of a Zoning Clearance for construction. The Planning Division maintains copies of the Protection Plan provided by the Permittee in the Project file.

MM-BIO-2: Catalina Mariposa Lily (*Calochortus catalinae*) Restoration Plan

Purpose: To avoid potentially significant impacts to the California Mariposa Lily, which is a special status plant species.

Requirement: If permanent impacts on the Catalina mariposa lily population cannot be avoided, a Special Status Plant Species Restoration Plan shall be required. The Restoration

Plan shall be prepared by a County-approved biologist and shall include the following components: location of mitigation site; methods for site preparation and transplanting plants; and maintenance procedures related to pest control, fencing, supplemental seeding, erosion control, access control, and supplemental irrigation. The plan shall 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 the required mitigation ratios, to be no less than 1:1; quantitative success criteria; and a monitoring and reporting schedule. The plan shall 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: A Restoration Plan prepared by a County-approved biologist.

Timing: The qualified biologist shall survey for California Mariposa Lily in the spring (March-May) prior to the initiation of ground-disturbing activities to re-confirm the extent of the population.

The Restoration Plan shall be approved by the County prior to the start of Project activities. Pre-construction surveys and any necessary relocation of plants or bulbs shall occur 3 to 7 days before clearing, grubbing, and grading activities occur.

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

The Permittee shall submit the Restoration Plan to the Planning Division for review and approval to assure compliance with the requirements of this condition prior to issuance of a Zoning Clearance for construction. The Planning Division maintains copies of the Restoration Plan provided by the Permittee in the Project file.

MM-BIO-3: Fuel Modification Plan

Purpose: To minimize potential impacts of vegetation trimming and clearing on special-status species or communities occurring within the Fuel Modification Zones.

Requirement: The Permittee shall use a County-approved qualified biologist or licensed landscape architect to prepare a Fuel Modification Plan for County Planning review and approval that minimizes impacts to special-status plants, animals, and/or communities and meets the Ventura County Fire Protection District's requirements to modify fuels surrounding structures. The Fuel Modification Plan shall specify the methods of modifying vegetation surrounding structures that will avoid impacts to special-status plants, animals, and/or communities (e.g., use of hand tools to prune vegetation, thinning shrubs rather than clear-

cutting, avoiding rare plants, avoiding nesting birds). The Fuel Modification Plan shall include the establishment of fuel mosaic zones, where patches of Catalina mariposa lilies, native milkweed, and other important native plant species can be left undisturbed during routine vegetation maintenance activities and brush clearance events.

Documentation: A Fuel Modification Plan prepared by a County-approved biologist.

Timing: The Fuel Modification Plan shall be submitted to and approved by the Planning Division and Ventura County Fire Department prior to issuance of a Zoning Clearance.

Monitoring and Reporting: The Permittee shall submit the Fuel Modification Plan to the Planning Division and the Ventura County Fire Protection District for review and approval to assure compliance with the requirements of this condition prior to issuance of a Zoning Clearance for construction. The Planning Division maintains copies of the Fuel Modification Plan provided by the Permittee in the Project file.

MM-BIO-4: Monarch Butterfly Habitat Assessment, Protocol Surveys, and Take Avoidance

Purpose: To avoid and/or minimize direct and indirect impacts to Monarch butterfly.

Requirement: A County-approved biologist shall conduct a habitat assessment prior to issuance of a grading permit, and no earlier than 30 days prior to initiating ground disturbance, to determine if Project areas contain habitat suitable to support monarchs. If suitable habitat is present, the qualified biologist shall assess the presence of monarchs by conducting protocol surveys consistent with USFWS recommendations. If monarchs are documented using Project areas for foraging, roosting, and/or breeding, then in the fall/winter prior to the start of construction, a County-approved qualified biologist must survey all suitable habitat, including native milkweed plants, within 1,000 feet of the Project Construction Footprint, with the first occurring during the first half of overwintering season (October – March) and the second in second half of the season. If the results of the surveys are negative for butterflies, the Project may proceed, and the biological monitor shall continue to monitor suitable habitat during the overwintering season for aggregations of roosting butterflies. If portions of the Project Construction Footprint are found to serve as an aggregation or roosting site for monarch butterflies, then a 100-foot no activity buffer shall be placed around these areas. No work shall be conducted within the buffer unless authorized by the County and only with the presence of a County-approved qualified biologist to monitor the populations. If winter roost trees are cited for removal due to safety or mortality concerns, they shall only be removed in coordination with and approval from the County.

If overwintering populations are present within the Project Construction Footprint, then at the end of each overwintering season (approximately March) a report shall be prepared by the County-approved qualified biologist and submitted by the Permittee to the County detailing the monitoring activities to serve as compliance with this measure.

Documentation: A County-approved biologist shall prepare a letter documenting the results of the survey(s), including a map depicting locations of the suitable habitat, including milkweed plants, and individuals observed.

Timing: The letter documenting the results of the survey(s) shall be submitted to the Planning Division prior to the issuance of a grading permit.

Monitoring and Reporting: If Monarch butterflies are documented using Project areas for foraging, roosting, and/or breeding, the Permittee will consult CDFW and USFWS for recommended avoidance measures prior to the start of ground disturbing activities.

MM-BIO-5: Native Milkweed Planting

Purpose: To offset potential loss of monarch foraging and breeding habitat.

Requirement: During the monarch habitat assessment described in Mitigation Measure MM-BIO-4, a qualified biologist shall map and flag native milkweed plants (*Asclepias* spp.) that are likely to be removed or damaged during Project activities. Mitigation Measure MM-BIO-3 (Fuel Modification Plan) includes recommendations to leave milkweed plants undisturbed in fuel mosaic zones during vegetation maintenance activities. Where avoidance is infeasible, removed milkweed plants shall be replaced on a 1:1 basis either through transplantation of the removed plants or through installation of native milkweed container plants. Any milkweed shall be locally native, preferably the same species as those removed from the Project Site and shall be planted in similar habitat as where it was found to occur.

Documentation: The qualified biologist shall prepare a brief letter documenting the locations of removed milkweed plants and locations of transplantations and/or installed container plants.

Timing: Identification of milkweed to be removed shall occur within 30 days of Project Implementation. Suitable locations for transplants and/or container plant installations shall be identified prior to milkweed removal and acquisition of container plants.

Monitoring and Reporting: The qualified biologist shall monitor the health and survival of transplanted and/or installed replacement plants through the remainder of their growing season and make recommendations for maintenance or replacement, if necessary.

MM-BIO-6: Prohibition on Non-Native Milkweed

Purpose: To offset potential loss of monarch foraging and breeding habitat.

Requirement: No non-native milkweed or plants treated with chemical pesticides shall be installed as replacement for removed plants, nor used in any new landscaping within the

Project area. To the extent feasible, landscaping within and adjacent to the Project area shall incorporate native, pesticide-free milkweed and other nectar-bearing native plants.

Documentation: A letter prepared by a County-approved biologist documenting the types and locations of replacement plants for removed plants, and a landscape plan prepared by a licensed landscape architect with respect to new landscaping within the Project area.

Timing: Types and locations of replacement plants shall be identified prior to milkweed removal and acquisition of container plants. The landscape plan shall be submitted to the Planning Division prior to the issuance of a grading permit.

Monitoring and Reporting: A County-approved biologist shall monitor the health and survival of installed replacement plants through the remainder of their growing season and make recommendations for maintenance or replacement, if necessary.

MM-BIO-7: Crotch's Bumble Bee Habitat Assessment, Protocol Surveys, and Take Avoidance

Purpose: To identify suitable habitat where Project activities are most likely to impact Crotch's bumble bees and avoid direct impacts to individuals.

Requirement: A County-approved qualified biologist shall conduct a habitat assessment survey within one year prior to the start of vegetation removal and/or ground-disturbing activities to determine if the Project Construction Footprint contains habitat suitable to support Crotch's bumble bees. If suitable habitat is present, the qualified biologist shall assess presence of foraging and nesting Crotch's bumble bees by conducting protocol surveys consistent with CDFW's Survey Considerations for California Endangered Species Act Candidate Bumble Bee Species. Focused surveys shall also be conducted throughout the entire Project area and during the appropriate flying season (April to August) to ensure no missed detection of Crotch's bumble bee occurs. Surveys for Crotch's bumble bee shall be conducted every year that Project activities will occur, as bumble bees are known to move their nests each year. The pre-construction surveys shall be conducted prior to ground-disturbing activities.

If Crotch's bumble bees are not detected during the pre-construction surveys but suitable habitat is present, a qualified biologist shall be present during ground-disturbing project activities that occur during the Crotch's bumble bee colony active period, to ensure that no impacts occur to a previously unidentified Crotch's bumble bee nest. No additional work restrictions with regard to Crotch's bumble bee shall be implemented for the remainder of the colony active period. If Crotch's bumble bees are detected, ground-disturbing activities shall be prohibited within 100 feet of any known, occupied Crotch's bumble bee nest, or as determined by the qualified biologist with approval of CDFW, who shall demarcate the approved buffer via flagging. If any individual Crotch's bumble bee or a Crotch's bumble bee

nest that cannot be avoided is found on a project site, the applicant will obtain an Incidental Take Permit from CDFW for impacts to this species. Work shall not resume in this area for the duration of the Crotch's bumble bee colony active period, unless concurrence from CDFW has been granted.

Documentation: The qualified biologist shall prepare a report documenting the results of the survey(s), including a map depicting locations of the suitable habitat, and any individuals or nests observed. The report shall be submitted to the County and CDFW prior to initiation of ground-disturbing activities.

Timing: The habitat assessment survey and any required protocol surveys for presence shall be conducted within one year prior to the start of ground-disturbing activities, and each year that Project activities will occur. Survey results shall be submitted to CDFW prior to the initiation of ground disturbing Project activities.

Monitoring and Reporting: If Crotch's bumble bees are documented using Project areas for foraging, nesting, and/or overwintering, or presence of the species is assumed based on the presence of suitable habitat, Project proponent will consult CDFW for recommended avoidance measures prior to the start of ground disturbing activities.

MM-BIO-8: Nighttime Bat Surveys

Purpose: To avoid impacts to bats that may occur within and adjacent to the Construction Footprint.

Requirement: A qualified bat specialist, approved by the County, shall conduct a nighttime survey to identify bat species, habitat usage, and roost locations within or adjacent to the Project Construction Footprint. The nighttime emergence survey should occur on a warm, dry night, when predicted nighttime lows are not less than 45˚F. The survey shall begin 30 minutes prior to the time of sunset and continue until one hour after sunset. During the nighttime survey, the bat biologist shall inspect each tree in and within a 100-foot buffer of the Development Footprint. All trees shall be examined and categorized on the basis of their suitability as day or maternity roosting habitat. Depending on the locations of roosts and number of roost exits, multiple surveyors may be required. The bat biologist and team of surveyors shall conduct acoustic surveys, aided by acoustic recognition technology (e.g., AnaBat or similar) during the nighttime survey. The length and extent of acoustic surveying depends on the time of year and target species. Acoustic monitoring nighttime surveys should be conducted for at least 3 nights in the summer and up to 10 nights in the winter to confirm absence. Visual surveys shall be conducted at the time of emergence with high quality night vision goggles (Generation 3+) and bat detectors. Several surveyors at multiple vantage points may be required to ensure adequate visual coverage, especially around large trees. Surveyors shall station themselves such that roost exit points are backlit with the sky and that their survey areas do not overlap. The visual survey shall start at sunset and continue for at

least 75 minutes, as roosting bats do not all emerge simultaneously. Only qualified bat specialists with appropriate handling permits will be permitted to handle bats.

Documentation: The bat biologist conducting nighttime surveys shall provide to the County and CDFW a report of survey results, including any species detected and a map of identified roost sites. Nighttime surveys shall be timed to allow species identification and the development of an appropriate Bat Avoidance and Protection Plan (BAPP), provided for formally in MM-BIO-10, below.

Timing: Nighttime surveys shall be timed to allow species identification and the development of an appropriate BAPP prior to the commencement of Project activities.

Exclusion approaches for foliage-roosting bats potentially impacted by Project activities should begin within 2 months before the start of ground-disturbing activities and/or tree limbing or removal.

Monitoring and Reporting: The County shall review the BAPP (formally required in MM-BIO-10) and ensure that all applicable mitigation measures are implemented prior to, during, and post-completion of Project activities, as required. If the installation of alternative habitat is required to offset the loss of roosting sites, a qualified biologist shall monitor the alternative habitat for the duration recommended in the BAPP.

MM-BIO-9: Acoustic Bat Surveys

Purpose: To avoid impacts to bats that may occur within and adjacent to the Construction Footprint.

Requirement: To confirm the presence of bats and identify species, passive acoustic detectors shall be deployed within the Project Construction Footprint for at least seven nights. The qualified bat biologist shall determine if acoustic data suggest a pattern of bats leaving at the expected emergence time and returning at dawn. Number of acoustic calls recorded during ten-minute intervals in the first 75 minutes after sunset shall be analyzed to determine if monitored trees or structures likely support a bat roost. A visual emergence survey, as described above, shall be conducted to confirm if potential roost structures are used by bats.

Documentation: The bat biologist conducting acoustic surveys shall provide to the County and CDFW a report of survey results, including any species detected and a map of identified roost sites. Acoustic surveys should be timed to allow species identification and the development of an appropriate Bat Avoidance and Protection Plan (BAPP).

Timing: Passive acoustic recorder surveys should be timed to allow species identification and the development of an appropriate BAPP prior to the commencement of Project activities. For example, where species may be impacted by loud equipment and vibrations, an exclusion

plan must be considered and implemented at least 9 months before the start of work and maintained through the completion of construction.

Exclusion approaches for foliage-roosting bats potentially impacted by Project activities should begin within 2 months before the start of ground-disturbing activities and/or tree limbing or removal.

Monitoring and Reporting: The County shall review the BAPP (formally required in MM-BIO-10) and ensure that all applicable mitigation measures are implemented prior to, during, and post-completion of Project activities, as required. If the installation of alternative habitat is required to offset the loss of roosting sites, a qualified biologist shall monitor the alternative habitat for the duration recommended in the BAPP.

MM-BIO-10: Bat Avoidance and Protection Plan

Purpose: To avoid impacts to bats that may occur within and adjacent to the Construction Footprint.

Requirement: If the visual and acoustic surveys (described in Mitigation Measures MM-BIO-8 and MM-BIO-9) are positive for the presence of bats, the bat biologist shall prepare a Bat Avoidance and Protection Plan (BAPP). Depending on the bat species present and roost locations, the plan may include the following elements:

- Required pre-construction surveys and monitoring
- Timing considerations for temporal avoidance (e.g., outside of the maternity season, May 1 - August 15, if the project may potentially impact a maternity roost or non-flying juvenile bats)
- Humane relocation and exclusion methods to remove and/or exclude bats from roosting sites within structures or vegetation slated for removal
- If bats are found to be present during construction, all construction activities will be halted until the County approved biologists determines that all bats have left the construction site and that Project activities may be resumed
- If bats are found to be present during construction, all construction activities will be halted until the County approved biologists determines that all bats have left the construction site and that Project activities may be resumed
- Protective fencing or signage to avoid impacts to potential roosting habitat that shall remain on site

- Best Management Practices for minimizing the effects of noise, human activity, dust, lighting, and ground vibrations on bats
- On and/or off-site mitigation measures to compensate for lost roosting habitat, including installation of alternative roosting habitat sufficient to ensure a no net loss of habitat and/or roosting sites sufficient to ensure a no net loss of habitat and/or roosting sites
- Mitigation monitoring to evaluate the effectiveness of bat-related mitigation

Documentation: Preparation of the BAPP by a County-approved biologist.

Timing: The BAPP shall be submitted to the Planning Division prior to the issuance of a grading permit. The measures identified in the BAPP shall be implemented in accordance with the timeframes identified in the BAPP.

Monitoring and Reporting: The County shall review the BAPP and ensure that all applicable mitigation measures are implemented prior to, during, and post-completion of Project activities, as required. If the installation of alternative habitat is required to offset the loss of roosting sites, a qualified biologist shall monitor the alternative habitat for the duration recommended in the BAPP.

MM-BIO-11: Minimization of Night Lighting for Bat Habitat

Purpose: To avoid impacts to bats that may occur within and adjacent to the Construction Footprint.

Requirement: Contractors shall minimize construction night lighting on adjacent habitats. Exterior lighting within the Project Construction Footprint adjacent to bat habitat shall be the lowest illumination allowed for human safety and security and shall be selectively placed, shielded, and directed downward to the extent possible.

Documentation: If lighting is proposed during the construction phase, the Permittee shall submit a construction-phase lighting plan identifying the type of fixtures, lighting output, direction, shielding, and timing of operation for review and approval by the Planning Director.

Timing: The lighting plan shall be submitted to the Planning Division prior to the issuance of a grading permit or building permit.

Monitoring and Reporting: The County shall review the lighting plan to ensure that all exterior lighting adjacent to any bat habitat is installed and operated according to the construction-phase lighting plan.

MM-BIO-12: Nesting Bird Avoidance, Survey, and Protection Plan

Purpose: To prevent impacts to birds protected under the Migratory Bird Treaty Act.

Requirement: The Permittee shall conduct all demolition, tree removal/trimming, vegetation clearing, and grading activities (collectively, "land clearing activities"), and construction in such a way as to avoid nesting native birds. This can be accomplished by implementing one of the following options:

a. Timing of land clearing or construction: Prohibit land clearing or construction activities during the breeding and nesting season (February 1 – September 15, in which case the following surveys are not required; or

b. Surveys and avoidance of occupied nests: Conduct site-specific surveys prior to land clearing or construction activities during the breeding and nesting season (February 1 – September 15) and avoid occupied bird nests. A County-approved qualified biologist shall conduct surveys to identify any occupied (active) bird nests in the area proposed for disturbance. Occupied nests shall be avoided until juvenile birds have vacated the nest.

The County-approved qualified biologist shall conduct an initial breeding and nesting bird survey 30 days prior to the initiation of land clearing or construction activities. The County-approved qualified biologist shall continue to survey the Project Construction Footprint on a weekly basis, with the last survey completed no more than 3 days prior to the initiation of land clearing activities. The nesting bird survey must cover the development footprint and 300 feet from the Project Construction Footprint. If occupied (active) nests are found, land clearing activities within a setback area surrounding the nest shall be postponed or halted. Land clearing activities may commence in the setback area when the nest is vacated (juveniles have fledged) provided that there is no evidence of a second attempt at nesting, as determined by the County-approved qualified biologist. Land clearing activities can also occur outside of the setback areas. Pursuant to the recommendations of the California Department of Fish and Wildlife, the required setback is 300 feet for most birds and 500 feet for raptors. This setback can be increased or decreased based on the recommendation of the County-approved qualified biologist and approval from the Planning Division.

Documentation: The Permittee shall provide to the Planning Division a Survey Report from a County-approved qualified biologist documenting the results of the initial nesting bird survey and a plan for continued surveys and avoidance of nests 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 occupied nests discovered, and establishment of mandatory setback areas. The Permittee shall submit to the Planning Division a Mitigation Monitoring Report from a County-approved qualified biologist following land clearing activities documenting actions taken to avoid nesting birds and results.

Timing: If land clearing or construction activities will occur between February 1 – September 15, the County-approved qualified biologist shall conduct the nesting bird surveys 30 days prior to initiation of land clearing or construction activities, and weekly thereafter. The last survey for nesting birds shall be conducted no more than 3 days prior to initiation of land clearing or construction activities. The Permittee shall submit the Survey Report documenting the results of the first nesting bird survey and the signed contract to the Planning Division prior to issuance of a zoning clearance for construction. The Permittee shall submit the Mitigation Monitoring Report within 14 days of completion of the land clearing or construction activities.

Monitoring and Reporting: The Planning Division shall review 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.

MM-BIO-13: Special Status Reptile Avoidance, Protection, and Relocation Plan

Purpose: To avoid impacts to coastal whiptail, coast horned lizard, and California legless lizards that may occur within and adjacent to the Construction Footprint.

Requirement: A County-approved qualified biologist shall develop a relocation plan for coastal whiptail, coast horned lizard, and California legless lizard if the species is not able to be passively ushered out of harm's way to an area that is unaffected by the Project. At a minimum, the relocation plan shall include the following elements:

- Timing and location of focused surveys that shall be conducted for each species, with greater survey effort allotted to locations with the highest quality habitat and/or greatest potential for impacts
- Habitat and conditions of proposed relocation sites in nearby, undisturbed areas
- Protocols for trapping and relocating individuals of each species
- Protocols for documenting and reporting the number of individuals/species relocated

If the Project results in permanent impacts on documented habitat for these species, compensatory mitigation for the affected species at a minimum 2:1 ratio shall be required. Compensatory mitigation may include on and/or off-site restoration or enhancement of suitable habitat. Depending on the vegetation communities impacted, impacted habitat for special status reptiles may be mitigated through implementation of a standalone mitigation and monitoring plan, or through inclusion in a larger habitat mitigation and monitoring plan developed for the entire Project (refer to Mitigation Measure MM-BIO-19 [Development and Implementation of a Habitat Restoration and/or Replacement Plan]).

Documentation: The relocation plan shall be submitted to the County and CDFW for approval at least 60 days prior to any ground disturbing activities within potentially occupied habitat. The qualified biologist shall prepare a report documenting the relocation survey results and site clearance activities. The original and final locations of any special status reptile relocations shall be recorded and mapped.

Timing: During the recognized activity period of the special-status reptiles (March-November), a qualified biologist shall conduct at least three relocation surveys beginning thirty days prior to the start of construction. If construction occurs during the period of low activity for these species (December to February), the surveys shall be conducted prior to this period and exclusion fencing shall be placed around the construction impact areas to limit recolonization of the site.

A qualified biologist shall be present during the course of the ground-disturbing activities within or adjacent to suitable coastal scrub, oak woodland, and riparian habitat, and shall conduct clearance surveys for special status reptiles prior to the start of construction each day.

Monitoring and Reporting: The qualified biologist shall report the results of the relocation surveys to the County and CDFW. Monitoring of on- or off-site compensatory mitigation shall be conducted at least annually for five years following initial mitigation implementation to track the 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 (refer to Mitigation Measure MM-BIO-18 [Development and Implementation of a Habitat Restoration and/or Replacement Plan]).

MM-BIO-14: Pre-Construction Survey and Site Clearance

Purpose: To protect any special status plant or wildlife species occurring within or moving through the Construction Footprint through avoidance and relocation.

Requirement: A County-approved qualified biologist shall conduct a pre-construction survey one to three days before any clearing, grubbing, or grading activities occur for areas of temporary and permanent disturbance associated with the Project Construction Footprint. Grading activities shall occur no more than 3 days after site clearance occurs. If grading is discontinued for a period of more than 3 days, additional pre-construction surveys shall be required prior to restarting work. Areas containing special-status species or habitat for special-status species, shall be staked and flagged off as “No Entry/No Construction” areas to be avoided until construction is completed. If special status plants cannot be avoided, they shall be transplanted and/or replaced according to Mitigation Measure MM-BIO-17 (Special-status species Avoidance and Protection Plan). If special status animals are observed during the pre-construction survey and cannot be avoided, they shall be humanely moved off-site by a qualified (and permitted, as necessary) biologist and subsequently excluded from the project impact area following Mitigation Measure MM-BIO-17 (Special-status species Avoidance and

Protection Plan). If a special-status species is observed within areas of temporary or permanent impact and cannot be humanely relocated or legally relocated without a permit, then the qualified biologist shall consult with the responsible agencies for the appropriate course of action.

Documentation: The qualified biologist shall prepare a report documenting the pre-construction survey results and site clearance activities. The original and final locations of any wildlife or plant relocations shall be recorded and mapped.

Timing: The Project proponent shall ensure that pre-construction survey(s) are completed within three days prior to the start of ground-disturbing activities.

Monitoring and Reporting: The qualified biologist shall submit a pre-construction survey report to the County and CDFW and/or USFWS, as required by any regulatory permits.

MM-BIO-15: Biological Monitoring

Purpose: To protect any special status plant or wildlife species occurring within or moving through the Construction Footprint through avoidance and relocation.

Requirement: A County-approved qualified biologist shall be present each day during construction phase ground-disturbing activities, including vegetation removal, grubbing, and grading to the first 24 inches of soil depth, and at least weekly during other construction activities to ensure that biological avoidance and minimization measures are implemented. If special status wildlife species are observed within the work area, work shall be halted until the animal leaves the area of its own volition or is hand-captured and relocated to suitable habitat outside of the work area by a qualified biologist. If a special-status species is observed within areas of temporary or permanent impact and cannot be humanely relocated or legally relocated without a permit, then the qualified biologist shall consult with the responsible agencies for the appropriate course of action.

Documentation: The biological monitor shall prepare daily field notes of monitoring activities, which shall be summarized in a final monitoring report when construction activities have been completed at a particular site. The date and original and final locations of any wildlife relocations shall be recorded and mapped.

Timing: Monitoring shall be conducted daily during initial ground-disturbing activities and on a weekly basis during all other construction activities unless greater frequency is required in a protection plan developed for special-status species, bats, or nesting birds. Daily / weekly monitoring reports shall be sent to the Planning Division.

Monitoring and Reporting: The Project proponent shall ensure that biological monitoring occurs as required by this mitigation measure, or as stipulated for the protection of special-

status species, bats, and/or nesting birds, whichever is most frequent. The biological monitor shall submit daily / weekly monitoring reports and a final monitoring report to the County. The County shall provide the final monitoring report to CDFW and/or USFWS, as required by any regulatory permits.

MM-BIO-16: Focused Surveys for Special Status Wildlife

Purpose: To determine the presence or absence of special status wildlife species within the Construction Footprint.

Requirement: Where reconnaissance-level biological surveys indicate that areas within the Project Construction Footprint encroach upon potentially suitable habitat for special-status species, a County-approved qualified biologist shall conduct focused surveys for the potentially occurring species, utilizing agency-recommended survey protocols for applicable species. The timing of surveys may be species-specific. If the presence of a special-status species is documented within the Project impact area, the Project proponent shall consult with the appropriate agency or agencies (CDFW and/or USFWS) for recommended take avoidance measures and additional permitting requirements and prepare a Special-status species Avoidance and Protection plan (refer to Mitigation Measure MM-BIO-17 [Special-status species Avoidance and Protection Plan]). While focused and protocol surveys following the CDFW and/or USFWS protocols are considered most effective for detecting the target species, they may fail to detect individuals. The Project proponent may choose to assume presence of certain species based on the presence of high-quality habitat in lieu of, or in addition to, presence/absence surveys.

Documentation: The qualified biologist shall prepare a report documenting the results of the survey(s), including a map depicting locations of the suitable habitats and individuals observed.

Timing: Protocol-level surveys and resulting agency consultations shall occur prior to the approval and/or the issuance of a grading permit for Project activities.

Monitoring and Reporting: The qualified biologist shall report the results of any protocol surveys to the County and appropriate regulatory agencies, following all applicable protocol standards.

MM-BIO-17: Special-status species Avoidance and Protection Plan

Purpose: To protect any special-status species occurring within or moving through the Construction Footprint.

Requirement: If focused surveys indicate the presence of a special-status species, a County-approved qualified biologist shall notify the appropriate regulatory agencies (CDFW and/or

USFWS) and prepare a Special-status species Avoidance and Protection Plan. Depending on the site and project specifications, the plan may include the following elements:

- Timing considerations for temporal avoidance.
- Required pre-construction surveys and construction monitoring.
- Humane relocation and exclusion methods to remove and/or exclude wildlife from the Project Site.
- Translocation plan and procedures for special status plants.
- Protective fencing to avoid impacts to plants or wildlife habitat that shall remain on site.
- Best Management Practices for minimizing the effects of noise, human activity, dust, lighting, and ground vibrations during construction.
- On and/or off-site mitigation measures to compensate for lost or disturbed habitat.
- Required post-mitigation monitoring.

Documentation: The qualified biologist shall prepare the Special-status species Avoidance and Protection Plan, as described above, and submit it to the County and the appropriate regulatory agencies (CDFW and/or USFWS).

Timing: The Special-status species Avoidance and Protection Plan shall be submitted to and approved by the County and appropriate regulatory agencies (CDFW and/or USFWS) prior to the issuance of a grading permit.

Monitoring and Reporting: The County shall review the Special-status species Avoidance and Protection Plan and ensure that all applicable mitigation measures are implemented prior to, during, and post-completion of project activities, as required.

MM-BIO-18: Contractor Education

Purpose: To help Project personnel identify and avoid impacts to special-status species and other sensitive natural resources during construction activities.

Requirement: Before conducting construction activities, all Project personnel shall participate in an educational training session conducted by a qualified biologist. The education training shall include information about relevant special-status species, their habitat, identification, conservation, and appropriate protocol if they are observed during construction. The training session shall be repeated for any new personnel joining the Project before they begin construction activities.

Documentation: The qualified biologist shall provide a copy of the contractor education brochure to all Project personnel and the County for their review. The biologist shall also keep a list of Project personnel who have completed the training and submit it to the County at the completion of construction.

Timing: The qualified biologist shall conduct contractor education for Project personnel prior to the start of any ground-disturbing activities and repeat the training, as needed, for any new Project personnel before they begin construction activities.

Monitoring and Reporting: The Planning Division shall review the copy of the contractor education brochure as well as the list of Project personnel who have completed the training and shall maintain such documents in the Project file.

MM-BIO-19: 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 Fuel Modification Zone 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, or higher ratio if required by CDFW. The Project proponent shall 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 Permittee shall submit a Habitat Restoration and/or Replacement Plan prepared by a qualified biologist.

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.

MM-BIO-20: Best Management Practices

Purpose: To avoid significant impacts to plant and wildlife species during construction, Best Management Practices (BMPs) shall be employed.

Requirement: During construction, the Permittee shall adhere to the following BMPs:

a. All food items and associated refuse shall be placed in covered containers that preclude access or use by wildlife.

b. No dogs or other potentially predatory domesticated animals shall be allowed on the Project Site unless on a leash or otherwise contained at all times.

c. All construction equipment, staging areas, materials, and personnel shall remain within the perimeter of the disturbed area.

d. Feeding of wildlife by any employee or contractor of the Permittee shall be prohibited.

e. Temporary signage on the Project Site to inform personnel and visitors of the above requirements.

f. A County-approved qualified biologist shall confirm and photo-document the installation of the temporary signage.

Documentation: The Permittee shall prepare photo documentation of the complete installation of the signage and implementation of the above BMPs.

Timing: Prior to the issuance of a Zoning Clearance for construction (i.e. grading or land clearing activities), the Permittee must take the following actions: 1) install signage; and 2) submit photo documentation of the signage to the Planning Division.

Monitoring and Reporting: The Planning Division maintains copies of the signed photo-documentation in the Project file and has the authority to conduct periodic site inspections to ensure ongoing compliance with this condition.

MM-BIO-21: Low Impact Lighting Plan

Purpose: To ensure lighting on the subject property is provided in compliance with Section 8107-5.67 of the Ventura County Non-Coastal Zoning Ordinance.

Requirement: The Permittee shall submit two copies of a lighting plan to the Planning Division for review and approval prior to implementing such plan. The lighting plan shall comply with the following:

a. The lighting plan shall be prepared by an electrical engineer registered by the State of California.

b. The lighting plan shall include a photometric plan and manufacturer's specifications for each exterior light fixture type (e.g., light standards, bollards, and wall mounted packs). The Permittee shall also include the lighting color and maximum lumens for each light fixture.

c. The lighting plan shall provide illumination information within parking areas, pathways, streetscapes, and open spaces proposed throughout the development.

d. In order to minimize light and glare on the Project Site, all light fixtures shall be high cut-off type that divert lighting downward onto the property and shall not cast light on any adjacent property or roadway, or wildlife habitat.

e. The outdoor lighting shall maintain the maximum light trespass levels identified in Table 1 of NCZO Section 8109-4.7.4.

The Permittee shall bear the total cost of the review and approval of the lighting plan and shall install all elements of the approved lighting plan according to the approved Lighting Plan.

Documentation: The Permittee shall prepare the lighting plan.

Timing: The Permittee shall submit the lighting plan to the Planning Division for review and approval prior to the issuance of a Zoning Clearance for construction. The Permittee shall maintain the lighting as approved in the lighting plan for the life of the permit.

Monitoring and Reporting: The Planning Division shall maintain a stamped copy of the approved lighting plan in the Project file. The Building and Safety inspector and Planning Division staff have the authority to ensure that the lighting is installed according to the approved lighting plan prior to the issuance of a Certificate of Occupancy. The Planning Division has the authority to conduct periodic site inspections to ensure ongoing compliance with this condition.

MM-BIO-22: Protected Tree Mitigation and Protection Plan

Purpose: To comply with the County's Tree Protection Regulations (TPR) set forth in Section 8107-25 et seq. of the NCZO and the *Tree Protection Guidelines* (TPG),

Requirement: The Permittee shall avoid impacting protected trees to the extent feasible and shall offset or mitigate any damage to protected trees or associated impacts from such damage. If protected trees are felled/damaged and require offsets/mitigation pursuant to the County's TPR (Section 8107-25.10) and TPG (Section IV.C, Offset/Replacement Guidelines), the Permittee shall post a financial assurance to cover the costs of planting and maintaining

the offset trees. To avoid impacts to protected trees to the maximum extent feasible, the Permittee shall prepare a Tree Protection Plan.

Documentation: The TPP must include (but is not limited to):

a. locations of trees to be removed;

b. locations of trees to be encroached upon;

c. measures (such as protective fencing) to protect all TPR-protected trees whose tree protection zones (TPZs) are within 50 feet of the Project Construction Footprint (including stockpile and storage areas, access roads, and all areas to be used for construction activities) or within 10 feet of other trees proposed for felling or removal;

d. indication of which trees shall be transplanted as well as designated transplant and replacement planting locations;

e. the offset or mitigation that will be provided for any trees approved for felling; and

f. the offset or mitigation that will be provided should any protected trees be damaged unexpectedly.

A qualified arborist shall prepare the TPP in conformance with the County's TPR, TPG, and "Content Requirements for Tree Protection Plans."

If in-lieu fees will be paid to a conservation agency for tree offsets/mitigation, the Permittee shall submit to the Planning Division for review and approval, a tree mitigation plan from a conservation agency that explains how the mitigation funds will be used to support the preservation of protected trees. After the Planning Division's review and approval of the tree mitigation plan, the Permittee shall provide the Planning Division with a copy of the contract between the conservation agency and the Permittee.

If a financial assurance is required for tree offsets/mitigation, the Planning Division shall provide the Permittee with a "Financial Assurance Acknowledgement" form. The Permittee shall submit the required financial assurance and the completed "Financial Assurance Acknowledgement" form to the Planning Division. The Permittee shall submit annual verification that any non-cash financial assurances are current and have not expired.

Timing: Prior to the issuance of a Zoning Clearance for construction, the Permittee shall submit the TPP to the Planning Division for review and approval, implement all prior-to-construction tree protection measures, and submit the required documentation to demonstrate that the Permittee implemented the tree protection measures. Unless otherwise approved by the Planning Director, replacement and transplant trees must be planted prior to occupancy. Other monitoring and reporting dates shall be as indicated in the approved TPP.

If in lieu fees are required and will be paid to the Planning Division's Tree Impact Fund, the Permittee shall submit these fees prior to the issuance of a Zoning Clearance for construction. Where a TPP damaged tree addendum is prepared, the Permittee shall remit payment of the fees within 30 days of Planning Division's approval of the addendum.

If in lieu fees are required and will be paid to an approved conservation agency, the Permittee shall submit these fees, along with the required tree mitigation plan and contract from the conservation organization, prior to the issuance of a Zoning Clearance for construction.

If a financial assurance is required, the Permittee shall submit the required financial assurance and the completed "Financial Assurance Acknowledgement" form prior to the issuance of a Zoning Clearance for construction. The Planning Division may release the financial assurance after receiving the report from the Project arborist that verifies that the replacement trees met their final 5- or 7-year performance targets set forth in the TPP.

Monitoring and Reporting: The Permittee shall retain an arborist to monitor and prepare the documentation regarding the health of the protected trees, pursuant to the monitoring and reporting requirements set forth in the "Content Requirements for Tree Protection Plans." The Planning Division maintains the approved TPP and all supporting documentation in the Project file. The Resource Management Agency Operations Division maintains copies of all financial documentation. Planning Division staff, Building and Safety Inspectors, and Public Works Agency grading inspectors have the authority to inspect the site during the construction phase of the Project, in order to verify that tree protection measures remain in place during construction activities, consistent with the requirements of Section 8114-3 of the NCZO.

MM-BIO-23: Tree Health Monitoring and Reporting

Purpose: To comply with the County's TPR set forth in Section 8107-25 et seq. of the NCZO and the TPG,

Requirement: The Permittee shall submit annual monitoring reports, prepared by an arborist, after initiation of construction activities and until five years after the completion of construction activities, which address the success of tree protection measures and the overall condition of encroached-upon trees relative to their condition prior to the initiation of construction activities. If any trees are found to be in serious decline (e.g., "D" status, or "C" status if pre-construction status was "A"), the arborist's report must include a Damaged Tree Addendum to the TPP which recommends offsets and any associated additional monitoring.

Documentation: The Permittee shall submit annual arborist reports as stated in the "Requirement" section of this condition (above).

Timing: The Permittee shall submit annual arborist reports after initiation of construction activities and until two years after the completion of construction activities.

Monitoring and Reporting: The Permittee shall implement any recommendations made by the arborist's Damaged Tree Addendum to the satisfaction of the Planning Director. The Planning Division maintains copies of all documentation and evidence that the arborist's recommendations are implemented. The Planning Division has the authority to inspect the site to confirm the health of the protected trees and to ensure that the recommendations made by the arborist are implemented consistent with the requirements of Section 8114-3 of the NCZO.

IV.F. Cultural Resources

See Mitigation Measure MM-TCR-4 under Section IV.P, Tribal Cultural Resources.

IV.G. Energy

None required.

IV.H. Geology and Soils

MM-GEO-1 Paleontological Resources

Purpose: To avoid impacts to paleontological resources during construction activities.

Requirement: In the event paleontological resources are encountered during Project construction activities, work within 25 feet of the discovery shall be halted, and a Qualified Professional Paleontologist, defined as one who meets the standards set forth by the Society of Vertebrate Paleontology and the *County of Ventura Initial Study Assessment Guidelines,* shall be retained to assess the discovery and make appropriate recommendations regarding handling the resources and subsequent paleontological work.

Documentation: If paleontological resources are encountered, the Permittee shall submit a report prepared by a County-approved paleontologist including recommendations for the proper disposition of the resource.

Timing: If paleontological resources are uncovered during ground disturbing activities, the Planning Director shall be notified in writing within three days. The report prepared by the County-approved paleontologist shall be submitted to the Planning Division for review and approval before disposition of the resource.

Monitoring and Reporting: The Planning Division shall review the paleontologist's report (if applicable), and shall maintain such documents in the Project file.

IV.I. Greenhouse Gas Emissions

None required.

IV.J. Hazards and Hazardous Materials

See Mitigation Measure MM-FIRE-1 under Section IV.M, Public Services.

MM-HAZ-1 Emergency Preparedness and Procedures Plan

Purpose: To minimize risk to the Project as a result of a fire or other emergency.

Requirement. The camp currently maintains an Emergency Preparedness and Procedures Plan that provides procedures to be follow in the event of different types of emergencies, including a fire. Prior to expanded operations under the Project, the Permittee shall do the following:

a) Coordinate with the Ventura County Fire Department to develop a Fire Protection Plan for the Project Site that substantially conforms to the Emergency Preparedness and Procedures Plan included in Appendix L-1 of this Draft EIR. The plan shall describe fire prevention measures including access and defensible space clearing requirements; potential fire scenarios; and action plans for each potential scenario which include notification, suppression, evacuation measures, and a plan for sheltering in place if recommended by VCFD, in the event of a fire within the Project Site or within adjacent areas. The Permittee shall comply with all applicable elements of the Emergency Preparedness and Procedures plan throughout the period of site operations.

b) Install and maintain emergency water distribution systems and/or other suitable fire suppression systems on the Project Site in compliance with State and County fire code.

Documentation: The Permittee shall submit an Emergency Preparedness and Procedures Plan, which incorporates the requirements listed above.

Timing: The Emergency Preparedness and Procedures Plan shall be submitted to and approved by the Planning Division and Ventura County Fire Department prior to issuance of a Zoning Clearance.

Monitoring and Reporting: The Permittee shall submit the Emergency Preparedness and Procedures Plan to the Planning Division and the Ventura County Fire Department for review and approval to assure compliance with the requirements of this condition prior to issuance of a Zoning Clearance for construction. The Planning Division maintains copies of the Emergency Preparedness and Procedures Plan provided by the Permittee in the Project file.

IV.K. Hydrology and Water Quality

None required.

IV.L. Noise

None required.

IV.M. Public Services (Fire and Police)

MM-FIRE-1 Site Improvements to Mitigate Fire Risk

Purpose: To minimize risk to the Project as a result of a fire.

Requirement: The Project shall incorporate the following site improvements:

- All gates shall be retrofitted to allow exiting without keys, codes, or special knowledge.
- Electric gates shall be retrofitted with an auto-exit loop sensor.
- Defensible zones shall be increased to 200 feet from buildings (normally 100 feet) and 25 feet along the roads (normally 10 feet).
- All existing buildings shall be required to meet the following defensible space standards:
    - Zone 0 (5-foot non-combustible zone).
    - Extended fuel reduction/thinning zones to 200 feet from buildings.
- The 25-foot road clearance shall apply to the High Road from the main entrance to Hidden Ranch Drive.
- Additional road widening of High Road where possible to 24 feet with turnouts and turnarounds for emergency vehicles (as shown on the fire access exhibit included in Appendix M-2).

Documentation: The improvements required by this measure shall be depicted on a site plan.

Timing: The site plan showing the site improvements required by this measure shall be submitted to and approved by the Planning Division and Ventura County Fire Department prior to issuance of a Zoning Clearance.

Monitoring and Reporting: The Permittee shall submit the site plan showing the site improvements required by this measure to the Planning Division and the Ventura County Fire Department for review and approval to assure compliance with the requirements of this condition prior to issuance of a Zoning Clearance for construction. The Planning Division maintains copies of the site plan provided by the Permittee in the Project file.

IV.N. Recreation

None required.

IV.O. Transportation

None required.

IV.P. Tribal Cultural Resources

MM-TCR-1 Worker Awareness Training

Purpose: To help Project personnel identify and avoid impacts to tribal cultural resources during construction activities.

Requirement: Prior to initiating construction, the Permittee shall retain a qualified archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for Archaeology, and tribal representative, culturally affiliated with the Project area. The qualified archaeologist and tribal representative shall conduct a Tribal Cultural Resources Worker Environmental Awareness Program (WEAP) for all construction personnel, to include the following:

1. Review of the type of artifacts that may be uncovered;
2. Examples of common archaeological artifacts that must be examined;
3. Review of why archaeological resources may be significant to archaeologists or Native Americans;
4. Procedures to notify interested parties in the event of a discovery, including tribal representatives culturally affiliated with the Project area;
5. Reporting requirements and responsibilities of the construction workers;
6. Procedures for recording, evaluating, and mitigating unanticipated discoveries; and
7. Procedures to be followed in the event of the discovery of a human burial or burial-associated artifacts.

Documentation: The qualified archaeologist and tribal representative shall prepare a memorandum documenting completion of the training, noting the topics covered, and providing a list of attendees, and submit it to the Planning Division.

Timing: The required worker awareness training shall be completed prior to initiation of ground disturbance. The archaeologist and tribal representative shall submit their memorandum to the Planning Division within three days of completing the training.

Monitoring and Reporting: The Planning Division shall review the memorandum documenting the completion of the training, and shall maintain such documents in the Project file.

MM-TCR-2 Monitoring During Ground Disturbance

Purpose: To avoid impacts to tribal cultural resources during construction activities.

Requirement: The Permittee shall retain an archaeological monitor, meeting the Secretary of the Interior's Professional Qualification Standards for Archaeology, and Native American

monitor, culturally affiliated with the Project area, to observe the first (5) days of ground-disturbing activities which include excavating, digging, and/or trenching that will result in the disturbance of terrace and alluvium/terrace deposits. Monitoring shall continue until all (5) days, consecutive or nonconsecutive, of ground-disturbing activities are completed.

If cultural resources are encountered, the monitors shall have the authority to request ground disturbing activities cease within 60-feet of the discovery to assess and document potential finds in real time. Both the archaeological monitor and Native American monitor shall have the opportunity to assess the find.

Should the find be deemed significant, the archaeological monitor and tribal monitor shall observe all remaining ground-disturbing activities including, but not limited to, clearing, grading, excavating, digging, trenching, plowing, drilling, tunneling, quarrying, leveling, driving posts, auguring, blasting, stripping topsoil or similar activity, and archaeological work.

Documentation: If no cultural resources are discovered, the archaeological monitor and Native American monitor shall submit a brief letter to the Planning Division, stating that no resources were discovered and that the monitoring activities have been completed. Should significant cultural resources be found, the archaeological and Native American monitors shall then provide a weekly report to the Planning Division summarizing the activities during the reporting period.

Timing: The archaeological monitor and Native American Monitor shall observe the first (5) days of ground-disturbing activities which include excavating, digging, and/or trenching that will result in the disturbance of terrace and alluvium/terrace deposits. Monitoring shall continue until all (5) days, consecutive or nonconsecutive, of ground-disturbing activities are completed.

Monitoring and Reporting: The Planning Division shall review the memorandum and weekly reports (if applicable) from the archaeological monitor and Native American monitor, and shall maintain such documents in the Project file.

MM-TCR-3 Discovery of Resources During Ground Disturbing Activities

Purpose: To avoid impacts to tribal cultural resources during construction activities.

Requirement: If any archaeological or historical artifacts are uncovered during ground disturbance or construction activities, the Permittee shall:

1. Cease operations within the immediate vicinity of the find (within a 60-foot buffer) and assure the preservation of the area in which the discovery was made;
2. Notify the Planning Director in writing, within three days of the discovery;

3. Obtain the services of a County-approved archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for Archaeology, who shall assess the find and provide recommendations on the proper disposition of the site in a written report format;
4. Obtain the Planning Director's written concurrence of the recommended disposition of the site before resuming development; and
5. Implement the agreed upon recommendations.

Work on the portions of the Project Site outside of the buffered area may continue during the period of assessment of the find.

Documentation: If archaeological remains are encountered, the Permittee shall submit a report prepared by a County-approved archaeologist including recommendations for the proper disposition of the site. Additional documentation may be required to demonstrate that the Permittee has implemented any recommendations made by the archaeologist's report.

Timing: If archaeological or historic artifacts are uncovered during ground disturbing activities, the Planning Director shall be notified in writing within three days. The report prepared by the County-approved archaeologist shall be submitted to the Planning Division for review and approval before disposition of the resource.

Monitoring and Reporting: The Planning Division shall review the archaeologist's report (if applicable), and shall maintain such documents in the Project file.

MM-TCR-4 Inadvertent Discovery of Human Remains

Purpose: To avoid impacts to human remains during construction activities.

Requirement: If any human burial remains or funerary objects are encountered during ground disturbance or construction activities, the Permittee shall:

1. Cease operations within the immediate vicinity of the find (within a 100-foot buffer of the find) and assure the preservation of the area in which the discovery was made;
2. Immediately notify the County Coroner and the Planning Director;
3. Obtain the services of a County-approved archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for Archaeology, and if necessary, Native American Monitor(s), who shall assess the find and provide recommendations on the proper disposition of the site in a written report format;
    a. Inadvertent discoveries of human remains and/or funerary object(s) are subject to California State Health and Safety Code Section 7050.5, and the subsequent disposition of those discoveries shall be decided by the Most Likely Descendant (MLD), as determined by the Native American Heritage Commission (NAHC), should those findings be determined as Native American in origin.

4. Obtain the Planning Director's written concurrence of the recommended disposition of the site before resuming development on-site; and
5. Implement the agreed upon recommendations.

Work on the portions of the Project Site outside of the buffered area may continue during the period of assessment of the find.

Documentation: If human burial remains or funerary objects are encountered, the Permittee shall submit a report prepared by a County-approved archaeologist including recommendations for the proper disposition of the resource.

Timing: If human burial remains or funerary objects are uncovered during ground disturbing activities, the Planning Director and County Coroner shall be notified immediately. The report prepared by the County-approved archaeologist shall be submitted to the Planning Division for review and approval before disposition of the resource.

Monitoring and Reporting: The Planning Division shall review the archaeologist's report (if applicable), and shall maintain such documents in the Project file.

IV.Q. Utilities and Service Systems

None required.

IV.R. Wildfire

See Mitigation Measure MM-HAZ-1 under Section IV.J, Hazards and Hazardous Materials, and Mitigation Measure MM-FIRE-1 under Section IV.M, Public Services.

MM-WF-1 Post-Fire Response Plan

Purpose: To reduce or eliminate the risk of exposure to post-fire landslides or slope instability.

Requirement: The Permittee shall develop a post-fire response plan to ensure that people and structures on the Project Site would not be subject to post-fire landslides and/or flooding in the event that a fire occurs upslope from the cabins. The plan shall be approved by the VCFD, and shall include, but not be limited to, the following:

- Appropriate drainage facilities, including a plan to determine whether they are still operable post-fire and a plan to replace any damaged drainage facilities.
- Erosion and sediment control measures, such a mulch or barriers.
- Plan for seeding and revegetation with native plants.
- Plan for the maintenance of erosion and sediment control measures and replanted areas.

Documentation: The Permittee shall submit a post-fire response plan.

Timing: The post-fire response plan shall be developed and submitted for review and approval by the Planning Director and Fire Department prior to occupancy of the cabins. The post-fire response plan shall be implemented in the event that a fire burns the hillside above the cabins. Within three days of implementing the plan, the Permittee shall report to the Planning Director and Fire Department on the measures implemented.

Monitoring and Reporting: The Planning Division will retain a copy of the post-fire response plan in the Project file. In the event of a fire on the hillside above the cabins, the Planning Division and Fire Department may request that the Permittee implement the plan. The Planning Division and Fire Department may also conduct compliance inspections in accordance with Non-Coastal Zoning Ordinance Section 8114-3.

Appendix A

Comment Letters Received in Response to the Draft EIR

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State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
3883 Ruffin Road
San Diego, CA 92123
wildlife.ca.gov

GAVIN NEWSOM, Governor
VALERIE TERMINI, Acting Director

January 28, 2026

Michael Conger
County of Ventura
800 South Victoria Avenue
Ventura, CA 93009
Michael.Conger@venturacounty.gov

Subject: Draft Environmental Impact Report for the American Jewish University – Camp Alonim Project, SCH No. 2023110297, Ventura County, CA

Dear Michael Conger:

The California Department of Fish and Wildlife (CDFW) reviewed the Draft Environmental Impact Report (DEIR) from the County of Ventura (County) for the American Jewish University – Camp Alonim Project (Project) pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines[1].

Thank you for the opportunity to provide comments and recommendations regarding Project activities that may affect California fish and wildlife. Likewise, CDFW appreciates the opportunity to comment on 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.

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

[1] 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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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[2] 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: John Friedman, American Jewish University

Objective: The Project proponent requests a major modification to Conditional Use Permit No. 1776 for the development of additional facilities at Camp Alonim. Proposed facilities include a welcome center, 13 camper cabins, three 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 the new development, six existing structures would be demolished. Lastly, the Project would require the removal of 15 protected trees on site.

Location: The 2,588-acre Project site 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, 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. South of the proposed parking lot is an ephemeral stream that feeds into East Tributary Meier Canyon, which flows into channelized Arroyo Simi. East of the proposed parking lot is the upstream portion of the ephemeral stream that is fed from drainages in the adjacent Simi Hills.

Survey Area 1 (Project site with a 100-foot Fuel Modification Zone and an additional 300-ft buffer) was surveyed in February 2022. Survey Area 2 (SA2) includes the proposed cabin area, welcome center, parking lot, and a stretch of the ephemeral stream. SA2 was surveyed in April, May, and July 2022. A bat assessment survey was conducted in March 2024 within and adjacent to SA2. According to the DEIR, no other focused surveys have been conducted for any other special status species within the

[2] "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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Project site. Sensitive vegetation communities observed within the Project site include: *Platanus Racemosa*/*Quercus agrifolia* South Coast Woodland/Forest Association (State Rank (S) 3; 3.85 acres total; 1.35 acres impacted), *Quercus agrifolia*/*Quercus berberidifolia* Woodland/Forest Association (S3; 0.39 acre total; 0.39 acre impacted), California sagebrush - purple sage shrubland Association (S4; 0.49 acre total; no impacts), scrub oak shrubland Association (S4; 0.35 acre total; no impacts), California sagebrush shrubland Association (S4; 0.26 acre total; 0.26 acre impacted), and purple sage shrubland Association (S4; 0.09 acre total; 0.03 acre impacted).

Sensitive species that are of potential concern include, but are not limited to, Crotch's bumble bee (*Bombus crotchii*; CESA candidate endangered), California legless lizard (*Anniella stebbinsi*; California Species of Special Concern (SSC)), coastal whiptail (*Aspidoscelis tigris stejnegerf*, SSC), coast horned lizard (*Phrynosoma blainvillii*; SSC), western yellow bat (*Lasiurus xanthinus*; SSC), and pallid bat (*Antrozous pallidus'*, SSC).

The DEIR proposes mitigation measures regarding protection and restoration of Catalina mariposa lily (*Calochortus catalinae*); fuel modification plan; monarch butterfly habitat assessment, protocol surveys, and take avoidance; native milkweed planting; prohibition on non-native milkweed; Crotch's bumble bee habitat assessment, protocol surveys, and take avoidance; nighttime and acoustic bat surveys; bat avoidance and protection plan; minimization of night lighting for bat habitat; nesting bird avoidance, survey, and protection plan; special status reptile avoidance, protection, and relocation plan; pre-construction survey and site clearance; biological monitoring; focused surveys for special status wildlife; special status species avoidance and protection; contractor education; development and implementation of a habitat restoration and/or replacement plan; best management practices; low impact lighting plan; protected tree mitigation and protection plan; and tree health monitoring and reporting.

Project History: CDFW previously commented on the Notice of Preparation in December 2023. Comments consisted of local wildlife movement, Crotch's bumble bee, oak trees, bat species, wetlands, streams and riparian areas, facility sites, lighting design, and nesting birds and raptors.

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 are also included to improve the document.

COMMENT # 1: Impacts to Crotch's Bumble Bee

Issue: Project activities (i.e. vegetation removal and ground disturbance) could adversely impact Crotch's bumble bee. The DEIR does not include survey results for the presence or absence of Crotch's bumble bee.

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Specific impact: Mitigation measure BIO 7 may be improved to ensure impacts to Crotch's bumble bee are appropriately mitigated. Mitigation measure BIO 7 does not specify avoidance protocols if the species is detected and instead deferred to consulting with CDFW. This may result in missed observations of the species and adverse impacts at the time of construction.

Why impact would occur: The DEIR states that the Project site contains potential nesting and foraging habitat for Crotch's bumble bee. These results are based on a biological reconnaissance assessment, which do not equate to actual surveys for the presence or absence of Crotch's bumble bee. Crotch's bumble bee primarily nest in late February through late October underground in abandoned small mammal burrows but may also nest under perennial bunch grasses or thatched annual grasses, under-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 mated queens include soft, disturbed soil (Goulson 2010), or under leaf litter or other debris (Williams et al. 2014).

CDFW appreciates the incorporation of MM BIO-7 to include pre-construction surveys for Crotch's bumble bee. As currently written, avoidance measures, such as specific buffer distances or a halt in construction if the species is detected, are not included and state that CDFW shall be consulted if detected. The lack of specification and relying on consultation with CDFW at the time of detection may not adequately reduce adverse impact to the species and would be considered deferred mitigation. Additionally, the measure does not include a discussion regarding obtaining an Incidental Take Permit (ITP) in the event Crotch's bumble bee is found within the Project site. This may result in impacts to Crotch's bumble bee occurring without appropriate take authorization under CESA. Moreover, this does not address impacts to floral resources. Crotch's bumble bee can be adversely impacted when their floral resources are removed. Ground disturbance and vegetation removal associated with Project implementation during the breeding season could result in the incidental loss of breeding success or otherwise lead to nest abandonment in areas adjacent to the Project site. Without sufficient avoidance, minimization, or mitigation measures, the Project may result in undisclosed and unmitigated temporal or permanent loss of colonies, and suitable nesting and foraging habitat.

Evidence impact may be significant: 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. 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). CDFW considers impacts to species that are candidates for CESA listing to be significant, under CEQA. Accordingly, the Project may have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a

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candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or the United States Fish and Wildlife Service (USFWS).

CEQA Guidelines §15070 and §15071 require the document to analyze if the Project may have a significant effect on the environment as well as review if the Project will 'avoid the effect or mitigate to a point where clearly no significant effects would occur'. Relying on future surveys, the preparation of future management plans, or mitigating by obtaining permits from CDFW, are considered deferred mitigation under CEQA. In order to analyze if a project may have a significant effect on the environment, the project related impacts, including survey results for species that occur in the entire project footprint need to be disclosed during the public comment period. This information is necessary to allow CDFW to comment on alternatives to avoid impacts, as well as to assess the significance of the specific impact relative to the species (e.g., current range, distribution, population trends, and connectivity).

Recommended Potentially Feasible Mitigation Measure(s)

CDFW requests the following recommendations and mitigation measures are incorporated into the final CEQA document:

Mitigation Measure #1: Mitigation Measure BIO-7 Crotch's Bumble Bee Habitat Assessment, Protocol Surveys, and Take Avoidance - CDFW recommends the County revise Mitigation Measure BIO-7 to incorporate the underlined language and remove the language in strikethrough:

A County-approved qualified biologist shall conduct a habitat assessment survey within one year prior to the start of vegetation removal and/or ground-disturbing activities to determine if the Project Construction Footprint contains habitat suitable to support Crotch's bumble bees. If suitable habitat is present, the qualified biologist shall assess presence of foraging and nesting Crotch's bumble bees by conducting focused protocol surveys consistent with CDFW's ~~the~~ Survey Considerations for California Endangered Species Act Candidate Bumble Bee Species. Focused surveys shall also be conducted throughout the entire Project area and during the appropriate flying season (April to August) to ensure no missed detection of Crotch's bumble bee occurs. Surveys for Crotch's bumble bee shall be conducted every year that Project activities will occur, as bumble bees are known to move their nests each year. The pre-construction surveys shall be conducted prior to ground-disturbing activities. ~~If Crotch's bumble bees are documented using areas within the Project Construction Footprint for foraging, nesting, and/or overwintering, Project proponent shall consult CDFW for recommended take avoidance measures, which may include buffer zones to avoid disturbing any nests and/or on-going biological monitoring during vegetation removal, prior to the start of ground disturbing activities.~~

If Crotch's bumble bees are not detected during the pre-construction surveys but suitable habitat is present, a qualified biologist shall be present during ground-disturbing project activities that occur during the Crotch's bumble bee colony active period, to

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ensure that no impacts occur to a previously unidentified Crotch's bumble bee nest. No additional work restrictions with regard to Crotch's bumble bee shall be implemented for the remainder of the colony active period. If Crotch's bumble bees are detected, ground-disturbing activities shall be prohibited within 100 feet of any known, occupied Crotch's bumble bee nest, or as determined by the qualified biologist, who shall demarcate the 100- foot buffer via flagging. If any individual Crotch's bumble bee or a Crotch's bumble bee nest is found on a project site, the applicant will obtain an Incidental Take Permit from CDFW for impacts to this species. Work shall not resume in this area for the duration of the Crotch's bumble bee colony active period, unless concurrence from CDFW has been granted.

Mitigation Measure #2: No Net Loss - If the California Fish and Game Commission does not list Crotch's bumble bee under CESA, it will still remain an invertebrate of conservation priority under the California Terrestrial and Vernal Pool Invertebrates of Conservation Priority. Thus, there shall be no net loss of suitable habitat for Crotch's bumble bee. The County shall offset impacts on habitat for Crotch's bumble bee at no less than 2:1, so there is no net loss of suitable habitat.

Recommendation #1: CEQA - CDFW's issuance of an ITP for a Project is subject to CEQA. As a Responsible Agency, CDFW may consider the CEQA document from the lead agency/Project proponent for the Project. However, additional documentation may be required as part of an ITP application for the Project in order for CDFW to adequately develop an accurate take analysis and identify measures that would fully mitigate for take of CESA-listed species. To minimize additional requirements by CDFW pursuant to Fish and Game Code section 2081 and/or under CEQA, a project's CEQA document should fully identify the potential impacts to Crotch's bumble bee and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the ITP.

Recommendation #2: Updated Biological Assessment Surveys - 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 three years. CDFW strongly recommends the County retain a qualified biologist to perform an updated biological survey to account for the current state of the Project site and the inventory of biological species that may be present. The survey should be conducted at the appropriate time of year and time of day when sensitive species are active or otherwise identifiable for both wildlife and plants. Based on the survey results, the final CEQA document should propose avoidance and specific mitigation for Project impacts to special-status species. Findings from the updated general field surveys should be disclosed in the CEQA document for public review.

COMMENT # 2: Impacts to Streams

Issue: The Project may indirectly impact riparian vegetation associated with the ephemeral stream on site.

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Specific impact: Project activities (i.e. grading and ground disturbance) may cause indirect impacts, such as sedimentation and erosion, to the ephemeral stream and associated species. Based on the DEIR, it is unclear that CDFW will be notified for a Lake and Streambed Alteration (LSA) Agreement for Project activities occurring on site.

Why impact would occur: Project construction and activities occurring adjacent to and within the 100-foot buffer of the stream could impact it and associated riparian vegetation. The DEIR claims that approximately 3.85 acres of streambed and California Sycamore-Coast Live Oak South Coast Woodland may be considered riparian and under the authority of CDFW. Moreover, approximately 0.26 acres, potentially under the authority of CDFW, may be impacted by Project activities. While the DEIR outlines when permit triggers for an LSA Agreement, there is no specific language that a notification will be submitted for Project activities.

Evidence impact would 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)

CDFW requests the following recommendations and mitigation measures are incorporated into the final CEQA document:

Mitigation Measure #3: Lake and Streambed Alteration Agreement - CDFW has regulatory authority over activities in streams that will divert or obstruct the natural flow, or change the bed, channel, or bank (which may include associated riparian resources) of any river, stream, or lake or use material from a river, stream, or lake. For any such activities, the Project proponent 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 an LSA Agreement with the applicant is required prior to conducting the proposed activities. CDFW's issuance of a LSA

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Agreement for a project that is subject to CEQA will require CEQA compliance actions by CDFW as a Responsible Agency. A notification package for a LSA Agreement may be obtained by accessing CDFW's Lake and Streambed Alteration Program[3] website.

Recommendation #3: 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 DEIR 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 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 # 3: Impacts to Bats

Issue: The mitigation measure for bats may be improved to ensure adequate surveys occur prior to the start of construction to reduce potential adverse impacts.

Specific impact: Potential direct impacts include Project construction on structures or trees that may provide roosting habitat and therefore has the potential for the direct loss of bats. Indirect impacts to bats and roosts could result from increased noise disturbances, human activity, dust, vegetation clearing, ground disturbing activities (e.g., staging, access, excavation, grading), and vibrations caused by heavy equipment. Demolition and grading activities may impact bats potentially using man-made structures or surrounding trees as roost sites.

Why impact would occur: The DEIR states that there are potential direct Project impacts resulting in the demolition of existing buildings and/or removal of mature trees. The Project site contains suitable habitat for several bat species that have the potential to occur on the Project site including western yellow bat and pallid bat. MM-BIO-9 does not specifically call for construction to be halted if the species is detected during preconstruction surveys, which means that impacts to bats may occur without appropriate take authorization. Moreover, the mitigation measure does not provide specific compensatory mitigation to offset the permanent loss of confirmed roosting

[3] https://wildlife.ca.gov/Conservation/Environmental-Review/LSA

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sites for bats. Without replacement of habitat, the Project would contribute to the ongoing loss of suitable habitat on a local and regional scale.

Evidence impact would be significant: Bats are considered non-game mammals and are protected by state law from take and/or harassment (Fish and Game Code § 4150, CCR § 251.1). Several bat species are also considered Species of Special Concern, which meet the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines §15065). CDFW considers adverse impacts to a SSC, for the purposes of CEQA, to be significant without mitigation. Mitigation is not just exclusion from maternity roosts, wintering sites, night roosts, mating roosts and foraging sites, but providing similarly functioning habitat to what is impacted.

Recommended Potentially Feasible Mitigation Measure(s)

CDFW requests the following recommendations and mitigation measures are incorporated into the final CEQA document:

Mitigation Measure #4: Mitigation Measure BIO-8 Nighttime Bat Surveys – The County should revise Mitigation Measure BIO-8 to incorporate the underlined language and omit language in strikethrough:

A qualified bat specialist, <u>with the appropriate handling permits and</u> approved by the County, shall conduct a nighttime survey to identify bat species, habitat usage, and roost locations within or adjacent to the Project Construction Footprint. The nighttime emergence survey should occur on a warm, dry night, when predicted nighttime lows are not less than 45°F. The survey shall begin 30 minutes prior to the time of sunset and continue until one hour after sunset. During the nighttime survey, the bat biologist shall inspect each tree in and within a 100-foot buffer of the Development Footprint. All trees shall be examined and categorized on the basis of their suitability as day or maternity roosting habitat. Depending on the locations of roosts and number of roost exits, multiple surveyors may be required. The bat biologist and team of surveyors shall conduct acoustic surveys, aided by acoustic recognition technology (e.g., AnaBat or similar) during the nighttime survey. The length and extent of acoustic surveying depends on the time of year and target species. Acoustic monitoring nighttime surveys should be conducted for at least 3 nights in the summer and up to 10 nights in the winter to confirm absence. Visual surveys shall be conducted at the time of emergence with high quality night vision goggles (Generation 3+) and bat detectors. Several surveyors at multiple vantage points may be required to ensure adequate visual coverage, especially around large trees. Surveyors shall station themselves such that roost exit points are backlit with the sky and that their survey areas do not overlap. The visual survey shall start at sunset and continue for at least 75 minutes, as roosting bats do not all emerge simultaneously.

The bat biologist conducting nighttime surveys shall provide to the County and CDFW a report of survey results, including any species detected and a map of identified roost sites. Nighttime surveys shall be timed to allow species identification and the

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development of an appropriate Bat Avoidance and Protection Plan (BAPP), provided for formally in MM-BIO-10, below.

Mitigation Measure #5: Mitigation Measure BIO-9 Acoustic Bat Surveys – The County should revise Mitigation Measure BIO-9 to incorporate the underlined language and omit language in strikethrough:

To confirm the presence of bats and identify species, passive acoustic detectors shall be deployed within the Project Construction Footprint for at least seven nights. The qualified bat biologist shall determine if acoustic data suggest a pattern of bats leaving at the expected emergence time and returning at dawn. Number of acoustic calls recorded during ten-minute intervals in the first 75 minutes after sunset shall be analyzed to determine if monitored trees or structures likely support a bat roost. A visual emergence survey, as described above, shall be conducted to confirm if potential roost structures are used by bats. <u>If presence of individual bats is confirmed, the bat biologist shall halt Project activities until it has been determined that all individual bats have left the Project site and Project activities may resume.</u>

The bat biologist conducting acoustic surveys shall provide to the County and CDFW a report of survey results, including any species detected and a map of identified roost sites. Acoustic surveys should be timed to allow species identification and the development of an appropriate BAPP.

Mitigation Measure #6: Mitigation Measure BIO-10 Bat Avoidance and Protection Plan – The County should revise Mitigation Measure BIO-10 to incorporate the underlined language and omit language in strikethrough:

If the visual and acoustic surveys (described in Mitigation Measures MM-BIO-8 and MM-BIO-9) are positive for the presence of bats, the bat biologist shall prepare a Bat Avoidance and Protection Plan (BAPP). Depending on the bat species present and roost locations, the plan may include the following elements:

- Required pre-construction surveys and monitoring
- Timing considerations for temporal avoidance (e.g., outside of the maternity season, May 1 - August 15, if the project may potentially impact a maternity roost or non-flying juvenile bats)
- Humane relocation and exclusion methods to remove and/or exclude bats from roosting sites within structures or vegetation slated for removal
- Protective fencing or signage to avoid impacts to potential roosting habitat that shall remain on site
- Best Management Practices for minimizing the effects of noise, human activity, dust, lighting, and ground vibrations on bats
- On and/or off-site mitigation measures to compensate for lost roosting habitat, including installation of alternative roosting habitat
- Mitigation monitoring to evaluate the effectiveness of bat-related mitigation

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The County shall review the BAPP and ensure that all applicable mitigation measures are implemented prior to, during, and post-completion of Project activities, as required. If the installation of alternative habitat is required to offset the loss of roosting sites, a qualified biologist shall monitor the alternative habitat for the duration recommended in the BAPP.

Mitigation Measure #7: Bat Compensatory Mitigation – If the Project shall impact confirmed habitat of bats and avoidance is not achievable, the Project proponent shall provide compensatory mitigation for temporary and permanent loss of any habitat supporting SSC. There shall be no net loss of habitat supporting SSC (CEQA Guidelines, § 15370(e)). Compensatory mitigation shall be provided within the Project boundary at no less than 2:1. Mitigation shall provide appropriate habitat (depending on the species), refugia, and habitat structures that supports that species. A proposed mitigation area/plan shall be provided to the County and include a discussion on the territory size; roosting and foraging locations; food availability; and how all life cycle functions will be mitigated. The replacement habitat shall also be protected in perpetuity under a conservation easement dedicated to a local land conservancy or other appropriate entity, which should include an appropriate endowment to provide for the long-term management of mitigation lands.

ADDITIONAL COMMENTS

Additional comments or other suggestions are also included to improve the document.

Mitigation Measure BIO-10 Special Status Reptile Avoidance, Protection, and Relocation Plan – The County should revise Mitigation Measure BIO-13 to incorporate the underlined language and omit language in strikethrough:

A County-approved qualified biologist shall develop a relocation plan for coastal whiptail, coast horned lizard, and California legless lizard <u>if the species is not able to be passively ushered out of harm's way to an area that is unaffected by the Project.</u> At a minimum, the relocation plan shall include the following elements:

- Timing and location of focused surveys that shall be conducted for each species, with greater survey effort allotted to locations with the highest quality habitat and/or greatest potential for impacts
- Habitat and conditions of proposed relocation sites in nearby, undisturbed areas
- Protocols for trapping and relocating individuals of each species
- Protocols for documenting and reporting the number of individuals/species relocated

If the Project results in permanent impacts on documented habitat for these species, compensatory mitigation for the affected species at a <u>minimum 2:1</u> ~~1:1~~ ratio shall be required. Compensatory mitigation may include on- and/or off-site restoration or enhancement of suitable habitat. Depending on the vegetation communities impacted, impacted habitat for special status reptiles may be mitigated through implementation of

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a standalone mitigation and monitoring plan, or through inclusion in a larger habitat mitigation and monitoring plan developed for the entire Project (refer to Mitigation Measure MM-BIO-19 [Development and Implementation of a Habitat Restoration and/or Replacement Plan]).

The relocation plan shall be submitted to the County and CDFW for approval at least 60 days prior to any ground disturbing activities within potentially occupied habitat. The qualified biologist shall prepare a report documenting the relocation survey results and site clearance activities. The original and final locations of any special status reptile relocations shall be recorded and mapped.

During the recognized activity period of the special-status reptiles (March-November), a qualified biologist shall conduct at least three relocation surveys beginning thirty days prior to the start of construction. If construction occurs during the period of low activity for these species (December to February), the surveys shall be conducted prior to this period and exclusion fencing shall be placed around the construction impact areas to limit recolonization of the site.

A qualified biologist shall be present during the course of the ground-disturbing activities within or adjacent to suitable coastal scrub, oak woodland, and riparian habitat, and shall conduct clearance surveys for special status reptiles prior to the start of construction each day. The qualified biologist shall report the results of the relocation surveys to the County and CDFW. Monitoring of on- or off-site compensatory mitigation shall be conducted at least annually for five years following initial mitigation implementation to track the 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 (refer to Mitigation Measure MM-BIO-18 [Development and Implementation of a Habitat Restoration and/or Replacement Plan]).

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, § 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).

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, §

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21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDB). The CNDDB website[4] 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[5].

The County should ensure data collected for the preparation of the DEIR 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 DEIR 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 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[6], Environmental Scientist.

Sincerely,

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

[4] https://wildlife.ca.gov/Data/CNDDB
[5] https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities/Submit
[6] Phone: (858) 354-3527; Email: Joleena.delafe@wildlife.ca.gov

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ATTACHMENTS

Attachment A: Draft Mitigation, Monitoring, and Reporting Program

ec: California Department of Fish and Wildlife
Victoria Tang, Environmental Program Manager
Frederic (Fritz) Rieman, Senior Environmental Scientist (Supervisor)
Joleena De La Fe, Environmental Scientist

Office of Land Use and Climate Innovation
State.Clearinghouse@lci.ca.gov

REFERENCES

[CDFW] California Department of Fish and Wildlife. 2023. Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species. Available from: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=213150&inline

[CDFW] California Department of Fish and Wildlife. 2026. Lake and Streambed Alteration Program. Available from: https://wildlife.ca.gov/Conservation/Environmental-Review/LSA

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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.

Mitigation Measure	Timing	Responsible Party
Recommendation #1: CEQA - CDFW's issuance of an ITP for a Project is subject to CEQA. As a Responsible Agency, CDFW may consider the CEQA document from the lead agency/Project proponent for the Project. However, additional documentation may be required as part of an ITP application for the Project in order for CDFW to adequately develop an accurate take analysis and identify measures that would fully mitigate for take of CESA-listed species. To minimize additional requirements by CDFW pursuant to Fish and Game Code section 2081 and/or under CEQA, a project's CEQA document should fully identify the potential impacts to Crotch's bumble bee and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the ITP.	Prior to Project Initiation	Lead Agency/Project Proponent
Recommendation #2: Updated Biological Assessment Surveys - 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 three years. CDFW strongly recommends the County retain a qualified biologist to perform an updated biological survey to account for the current state of the Project site and the inventory of biological species that may be present. The survey should be conducted at the appropriate time of year and time of day when sensitive species are active or otherwise identifiable for both wildlife and plants. Based on the survey results, the final CEQA document should propose avoidance and specific mitigation for Project impacts to special-status species. Findings from	Prior to Project Initiation	Lead Agency/Qualified Biologist

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Mitigation Measure	**Timing**	**Responsible Party**
the updated general field surveys should be disclosed in the CEQA document for public review.		
Mitigation Measure #1: Mitigation Measure BIO-7 Crotch's Bumble Bee Habitat Assessment, Protocol Surveys, and Take Avoidance - CDFW recommends the County revise Mitigation Measure BIO-7 to incorporate the underlined language and remove the language in strikethrough: A County-approved qualified biologist shall conduct a habitat assessment survey within one year prior to the start of vegetation removal and/or ground-disturbing activities to determine if the Project Construction Footprint contains habitat suitable to support Crotch's bumble bees. If suitable habitat is present, the qualified biologist shall assess presence of foraging and nesting Crotch's bumble bees by conducting focused protocol surveys consistent with CDFW's ~~the~~ Survey Considerations for California Endangered Species Act Candidate Bumble Bee Species. Focused surveys shall also be conducted throughout the entire Project area and during the appropriate flying season (April to August) to ensure no missed detection of Crotch's bumble bee occurs. Surveys for Crotch's bumble bee shall be conducted every year that Project activities will occur, as bumble bees are known to move their nests each year. The pre-construction surveys shall be conducted prior to ground-disturbing activities. ~~If Crotch's bumble bees are documented using areas within the Project Construction Footprint for foraging, nesting, and/or overwintering, Project proponent shall consult CDFW for recommended take avoidance measures, which may include buffer zones to avoid disturbing any nests and/or on-going biological monitoring during vegetation removal, prior to the start of ground disturbing activities.~~	Prior to Project Initiation	Lead Agency

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Mitigation Measure	Timing	Responsible Party
If Crotch's bumble bees are not detected during the pre-construction surveys but suitable habitat is present, a qualified biologist shall be present during ground-disturbing project activities that occur during the Crotch's bumble bee colony active period, to ensure that no impacts occur to a previously unidentified Crotch's bumble bee nest. No additional work restrictions with regard to Crotch's bumble bee shall be implemented for the remainder of the colony active period. If Crotch's bumble bees are detected, ground-disturbing activities shall be prohibited within 100 feet of any known, occupied Crotch's bumble bee nest, or as determined by the qualified biologist, who shall demarcate the 100- foot buffer via flagging. If any individual Crotch's bumble bee or a Crotch's bumble bee nest is found on a project site, the applicant will obtain an Incidental Take Permit from CDFW for impacts to this species. Work shall not resume in this area for the duration of the Crotch's bumble bee colony active period, unless concurrence from CDFW has been granted. If the California Fish and Game Commission decides not to list Crotch's bumble bee under CESA, this measure will no longer be required.		
Mitigation Measure #2: No Net Loss - If the California Fish and Game Commission does not list Crotch's bumble bee under CESA, it will still remain an invertebrate of conservation priority under the California Terrestrial and Vernal Pool Invertebrates of Conservation Priority. Thus, there shall be no net loss of suitable habitat for Crotch's bumble bee. The County shall offset impacts on habitat for Crotch's bumble bee at no less than 2:1, so there is no net loss of suitable habitat.	All Stages of Project Implementation	Lead Agency

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Mitigation Measure	Timing	Responsible Party
Mitigation Measure #3: Lake and Streambed Alteration Agreement - CDFW has regulatory authority over activities in streams that will divert or obstruct the natural flow, or change the bed, channel, or bank (which may include associated riparian resources) of any river, stream, or lake or use material from a river, stream, or lake. For any such activities, the Project proponent 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 an LSA Agreement with the applicant is required prior to conducting the proposed activities. 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. A notification package for a LSA Agreement may be obtained by accessing CDFW's Lake and Streambed Alteration Program website.	Prior to Project Initiation	Lead Agency/Project Proponent
Recommendation #3: 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 DEIR 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 following: erosion and pollution control measures, avoidance of resources, protective measures for downstream resources, on-	Prior to Project Initiation	Lead Agency/Project Proponent

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Mitigation Measure	Timing	Responsible Party
and/or off-site habitat creation, enhancement, or restoration, and/or protection, and management of mitigation lands in perpetuity.		
Mitigation Measure #4: Mitigation Measure BIO-8 Nighttime Bat Surveys – The County should revise Mitigation Measure BIO-8 to incorporate the underlined language and omit language in strikethrough: A qualified bat specialist, with the appropriate handling permits and approved by the County, shall conduct a nighttime survey to identify bat species, habitat usage, and roost locations within or adjacent to the Project Construction Footprint. The nighttime emergence survey should occur on a warm, dry night, when predicted nighttime lows are not less than 45°F. The survey shall begin 30 minutes prior to the time of sunset and continue until one hour after sunset. During the nighttime survey, the bat biologist shall inspect each tree in and within a 100-foot buffer of the Development Footprint. All trees shall be examined and categorized on the basis of their suitability as day or maternity roosting habitat. Depending on the locations of roosts and number of roost exits, multiple surveyors may be required. The bat biologist and team of surveyors shall conduct acoustic surveys, aided by acoustic recognition technology (e.g., AnaBat or similar) during the nighttime survey. The length and extent of acoustic surveying depends on the time of year and target species. Acoustic monitoring nighttime surveys should be conducted for at least 3 nights in the summer and up to 10 nights in the winter to confirm absence. Visual surveys shall be conducted at the time of emergence with high quality night vision goggles (Generation 3+) and bat detectors. Several surveyors at multiple vantage points may be required to ensure adequate visual coverage, especially around large trees. Surveyors shall station themselves such that roost exit points are backlit with the sky and that their survey areas do not overlap. The	Prior to Project Initiation	Lead Agency

Docusign Envelope ID: FF51EA4F-604F-49A7-BED8-75BD3A8774CB

Mitigation Measure	Timing	Responsible Party
visual survey shall start at sunset and continue for at least 75 minutes, as roosting bats do not all emerge simultaneously. The bat biologist conducting nighttime surveys shall provide to the County and CDFW a report of survey results, including any species detected and a map of identified roost sites. Nighttime surveys shall be timed to allow species identification and the development of an appropriate Bat Avoidance and Protection Plan (BAPP), provided for formally in MM-BIO-10, below.		
Mitigation Measure #5: Mitigation Measure BIO-9 Acoustic Bat Surveys – The County should revise Mitigation Measure BIO-9 to incorporate the underlined language and omit language in strikethrough: To confirm the presence of bats and identify species, passive acoustic detectors shall be deployed within the Project Construction Footprint for at least seven nights. The qualified bat biologist shall determine if acoustic data suggest a pattern of bats leaving at the expected emergence time and returning at dawn. Number of acoustic calls recorded during ten-minute intervals in the first 75 minutes after sunset shall be analyzed to determine if monitored trees or structures likely support a bat roost. A visual emergence survey, as described above, shall be conducted to confirm if potential roost structures are used by bats. <u>If presence of individual bats is confirmed, the bat biologist shall halt Project activities until it has been determined that all individual bats have left the Project site and Project activities may resume.</u> The bat biologist conducting acoustic surveys shall provide to the County and CDFW a report of survey results, including any species detected and a map of	Prior to Project Initiation	Lead Agency

Docusign Envelope ID: FF51EA4F-604F-49A7-BED8-75BD3A8774CB

Mitigation Measure	Timing	Responsible Party
identified roost sites. Acoustic surveys should be timed to allow species identification and the development of an appropriate BAPP.		
Mitigation Measure #6: Mitigation Measure BIO-10 Bat Avoidance and Protection Plan – The County should revise Mitigation Measure BIO-10 to incorporate the underlined language and omit language in strikethrough: If the visual and acoustic surveys (described in Mitigation Measures MM-BIO-8 and MM-BIO-9) are positive for the presence of bats, the bat biologist shall prepare a Bat Avoidance and Protection Plan (BAPP). Depending on the bat species present and roost locations, the plan may include the following elements: • Required pre-construction surveys and monitoring • Timing considerations for temporal avoidance (e.g., outside of the maternity season, May 1 - August 15, if the project may potentially impact a maternity roost or non-flying juvenile bats) • Humane relocation and exclusion methods to remove and/or exclude bats from roosting sites within structures or vegetation slated for removal <u>shall be reviewed by CDFW and the County prior to implementation</u> • Protective fencing or signage to avoid impacts to potential roosting habitat that shall remain on site • Best Management Practices for minimizing the effects of noise, human activity, dust, lighting, and ground vibrations on bats • On and/or off-site mitigation measures to compensate for lost roosting habitat, including installation of alternative roosting habitat • Mitigation monitoring to evaluate the effectiveness of bat-related mitigation	Prior to Project Initiation	Lead Agency

Docusign Envelope ID: FF51EA4F-604F-49A7-BED8-75BD3A8774CB

Mitigation Measure	Timing	Responsible Party
The County shall review the BAPP and ensure that all applicable mitigation measures are implemented prior to, during, and post-completion of Project activities, as required. If the installation of alternative habitat is required to offset the loss of roosting sites, a qualified biologist shall monitor the alternative habitat for the duration recommended in the BAPP.		
Mitigation Measure #7: Bat Compensatory Mitigation – If the Project shall impact confirmed habitat of bats and avoidance is not achievable, the Project proponent shall provide compensatory mitigation for temporary and permanent loss of any habitat supporting SSC. There shall be no net loss of habitat supporting SSC (CEQA Guidelines, § 15370(e)). Compensatory mitigation shall be provided within the Project boundary at no less than 2:1. Mitigation shall provide appropriate habitat (depending on the species), refugia, and habitat structures that supports that species. A proposed mitigation area/plan shall be provided to the County and include a discussion on the territory size; roosting and foraging locations; food availability; and how all life cycle functions will be mitigated. The replacement habitat shall also be protected in perpetuity under a conservation easement dedicated to a local land conservancy or other appropriate entity, which should include an appropriate endowment to provide for the long-term management of mitigation lands.	Prior to Project Initiation	Lead Agency/Project Proponent
Mitigation Measure BIO-10 Special Status Reptile Avoidance, Protection, and Relocation Plan – The County should revise Mitigation Measure BIO-13 to incorporate the underlined language and omit language in strikethrough: A County-approved qualified biologist shall develop a relocation plan for coastal whiptail, coast horned lizard, and California legless lizard if the species is not able	Prior to Project Initiation	Lead Agency

Docusign Envelope ID: FF51EA4F-604F-49A7-BED8-75BD3A8774CB

Mitigation Measure	Timing	Responsible Party
to be passively ushered out of harm's way to an area that is unaffected by the Project. At a minimum, the relocation plan shall include the following elements: • Timing and location of focused surveys that shall be conducted for each species, with greater survey effort allotted to locations with the highest quality habitat and/or greatest potential for impacts • Habitat and conditions of proposed relocation sites in nearby, undisturbed areas • Protocols for trapping and relocating individuals of each species • Protocols for documenting and reporting the number of individuals/species relocated If the Project results in permanent impacts on documented habitat for these species, compensatory mitigation for the affected species at a minimum 2:1 ~~1:1~~ ratio shall be required. Compensatory mitigation may include on and/or off-site restoration or enhancement of suitable habitat. Depending on the vegetation communities impacted, impacted habitat for special status reptiles may be mitigated through implementation of a standalone mitigation and monitoring plan, or through inclusion in a larger habitat mitigation and monitoring plan developed for the entire Project (refer to Mitigation Measure MM-BIO-19 [Development and Implementation of a Habitat Restoration and/or Replacement Plan]). The relocation plan shall be submitted to the County and CDFW for approval at least 60 days prior to any ground disturbing activities within potentially occupied habitat. The qualified biologist shall prepare a report documenting the relocation survey results and site clearance activities. The original and final locations of any special status reptile relocations shall be recorded and mapped.		

Docusign Envelope ID: FF51EA4F-604F-49A7-BED8-75BD3A8774CB

Mitigation Measure	Timing	Responsible Party
During the recognized activity period of the special-status reptiles (March-November), a qualified biologist shall conduct at least three relocation surveys beginning thirty days prior to the start of construction. If construction occurs during the period of low activity for these species (December to February), the surveys shall be conducted prior to this period and exclusion fencing shall be placed around the construction impact areas to limit recolonization of the site. A qualified biologist shall be present during the course of the ground-disturbing activities within or adjacent to suitable coastal scrub, oak woodland, and riparian habitat, and shall conduct clearance surveys for special status reptiles prior to the start of construction each day. The qualified biologist shall report the results of the relocation surveys to the County and CDFW. Monitoring of on- or off-site compensatory mitigation shall be conducted at least annually for five years following initial mitigation implementation to track the 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 (refer to Mitigation Measure MM-BIO-18 [Development and Implementation of a Habitat Restoration and/or Replacement Plan]).		

VENTURA COUNTY
AIR POLLUTION
CONTROL DISTRICT

ALI REZA GHASEMI, PE
Air Pollution Control Officer
4567 Telephone Road, 2nd Floor | Ventura, CA 93003
Phone: 805.303.4005 | Fax: 805.456.7797

VENTURA COUNTY
AIR POLLUTION CONTROL DISTRICT
Memorandum

TO: Michael Conger, County Planner DATE: January 30, 2026

FROM: Nicole Collazo, Air Quality Specialist, Planning Division NC

SUBJECT: American Jewish University Camp Alonim Draft Environmental Impact Report (RMA 25-043)

Ventura County Air Pollution Control District (APCD) staff has reviewed the subject Draft Environmental Impact Report (DEIR) for the project referenced above, which analyzed the environmental impacts of a Major Modification to Conditional Use Permit (CUP) No. 1776 to authorize further development of a camp. The project includes approximately 41,000 square feet (sq. ft.) of structures including the following: (1) a welcome center; (2) 13 camper cabins; (3) three head counselor cabins; (4) an arts pavilion; (5) a 58-space parking lot; and (6) landscaping improvements. As part of the project, the number of campers would increase by 100, from 472 to 572 campers. Additionally, the applicant proposes to increase the frequency of events and number of attendees they may have on the project Site. Six existing structures would be demolished, and 15 protected trees would be removed to accommodate the Project. The Lead Agency is the County of Ventura (County).

APCD has the following comments regarding the project's DEIR.

1) DEIR, Page IV.D-25. The project's construction emissions presented in Table IV.D-6 incorporate stringent emission reduction measures for the reduction of nitrous oxide, or NOx, being generated from the proposed construction off-road diesel equipment. As such, the emissions are considered "mitigated" or with best management practices needed, such as standard conditions of approval to ensure enforcement. The CalEEMod air emission reports found in Appendix B, Air Quality Technical Modeling, contain the following assumptions (PDF Page 48, 49, 50, 90, 91), found on Page 2.

APCD recommends amending Table IV.D-6 to state the emissions are "mitigated" or reduced with emission reduction measures, as APCD does not have adopted numerical thresholds for constructions and therefore mitigation may not be the appropriate term. However, emissions are always recommended to be quantified for construction and the projected emissions were estimated at 29 lbs./day for NOx, over the adopted threshold for operational emissions. The reduction strategy chosen was Tier 4 Final, the strictest tier of EPA-rated diesel off-road equipment. It may be that Tier 4 Interim or Tier 3 may suffice to bring emissions down below 25 lbs./day. However, APCD still recommends changing the language and discussion in the Air Quality analysis of the DEIR to disclose emissions presented are with the incorporation of Tier 4 Final equipment.

2. Emissions Summary

2.1. Construction Emissions Compared Against Thres

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs

Un/Mit.	ROG	NOx
Daily, Summer (Max)	—	—
Unmit.	3.21	29.2
Mit.	0.72	5.03
% Reduced	78%	83%
Daily, Winter (Max)	—	—
Unmit.	6.02	9.97
Mit.	5.27	3.70
% Reduced	12%	63%

2.3. Construction Emissions by Year, Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs

Year	ROG	NOx	C
Daily - Summer (Max)	—	—	-
2026	0.72	4.58	3
2027	0.64	5.03	2
Daily - Winter (Max)	—	—	-
2026	0.04	0.98	1
2027	0.42	3.06	1
2028	5.27	3.70	1

1.3. User-Selected Emission Reduction Measures by Emissions Sector

Sector	#	Measure Title
Construction	C-5	Use Advanced Engine Tiers

Building Construction	Tractors/Loaders/Backhoes	Diesel	Average	3.00
Paving	Pavers	Diesel	Average	2.00
Paving	Paving Equipment	Diesel	Average	2.00
Paving	Rollers	Diesel	Average	2.00
Architectural Coating	Air Compressors	Diesel	Average	1.00
Trenching	Trenchers	Diesel	Average	1.00

5.2.2. Mitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day
Demolition	Rubber Tired Dozers	Diesel	Tier 4 Final	2.00
Demolition	Excavators	Diesel	Tier 4 Final	3.00
Demolition	Concrete/Industrial Saws	Diesel	Tier 4 Final	1.00
Site Preparation	Rubber Tired Dozers	Diesel	Tier 4 Final	3.00
Site Preparation	Tractors/Loaders/Backhoes	Diesel	Tier 4 Final	4.00
Grading	Graders	Diesel	Tier 4 Final	1.00

Thank you for the opportunity to comment on the DEIR. If you have any questions, you may contact me at nicole@vcapcd.org.

COUNTY of VENTURA
RESOURCE MANAGEMENT AGENCY
CHARLES R. GENKEL
Environmental Health Director

January 27, 2026

Resource Management Agency
Ventura Planning Division
800 S Victoria Ave
Ventura, CA 93003
Contact: Philip Hess, RMA Planning/EDR Coordinator

American Jewish University – Camp Alonim Project, Draft Environmental Impact Report, ODR RMA REF #25-043 (PL22-0032)

Ventura County Environmental Health Division (Division) staff reviewed the information submitted for the subject project.

The project was initially reviewed by this Division in 2022 under PL22-0032. The below comments and conditions reflect comments and conditions provided in the previous review.

Hazardous Materials/ Hazardous

1. The project includes the continues use and storage of hazardous materials and/or hazardous waste. The existing business has an active hazardous waste generator permit from Ventura County Environmental Health Division/Certified Unified Program Agency (FA0004886).

   Hazardous Materials/Waste Management (CUPA Permit Required)
   Purpose: To comply with the California Code of Regulations Title 22, Division 4.5, California Health and Safety Code chapter 6.95; and Ventura County Ordinance Code, and to ensure the safe storage, handling, and disposal of any potentially hazardous material and/or waste.

   Requirement: The Permittee shall submit a Hazardous Materials Business Plan (HMBP) to the Environmental Health Division/Certified Unified Program Agency (Ventura CUPA) for storage of hazardous materials above reporting thresholds (200 cubic feet gas, 55 gallons liquid, 500 pounds solid). If hazardous wastes are generated, an EPA ID number issued by the California Department of Toxic Substances Control must be obtained and maintained in active status. Wastes identified as "non-hazardous" may require waste

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determination analysis to confirm if wastes are listed hazardous wastes, exhibits a hazardous characteristic through testing, or application of general knowledge.

Documentation: A completed HMBP must be submitted to the Ventura CUPA electronically through the California Environmental Reporting System (CERS). Maintain all records of hazardous waste determination testing and disposal and make available for review by this Ventura CUPA staff upon request.

Timing: HMBP must be submitted through CERS annually, and whenever there is a change to the type, quantity, or location of the hazardous materials. EPA ID number must be renewed annually.

Monitoring and Reporting: Verification of hazardous materials inventory as well as ongoing compliance with requirements shall be accomplished through field inspection by Ventura CUPA staff. Additional information on the storage and handling requirements for hazardous materials and wastes may be found on the Ventura County Environmental Health Division/Certified Unified Program Agency website: https://rma.venturacounty.gov/divisions/environmental-health/cupa-certified-unified-program-agency/

Public Health

2. The proposed project is a camp and shall be in compliance with all applicable State and local Environmental Health Division requirements standards.

Organized Camps

Purpose: To ensure that organized camps are designed, constructed and operated in compliance with all applicable State and local Environmental Health Division (EHD) requirements, including California Health and Safety Code and California Code of Regulations Title 17, Title 22, and Title 24.

Requirement: The Permittee shall obtain a Permit to Operate from the Ventura County EHD, Community Services Section for the organized camp, swimming pool and/or food facilities.

Documentation: Submit the required application and plans to the Ventura County EHD, Community Services Section for review and approval.

Timing: Permittee shall obtain all applicable building permits prior to construction. Permittee shall obtain final construction approval and a Permit to Operate prior to use of organized camp facilities.

Monitoring: Plan review and construction inspections, as well as routine site inspections to ensure ongoing compliance with regulations related to organized camps, shall be conducted by Ventura County EHD, Community Services staff.

3. Horseback riding is an activity offered by the camp. Ensure the site does not contribute to the harborage and/or breeding of potential vectors of disease or create a public nuisance.

General Vector Control – Animal Waste and Mosquito Breeding

Purpose: To ensure site does not contribute to the harborage and/or breeding of potential vectors of disease or create a public nuisance.

Requirement: The storage, handling and disposal of animal wastes shall be in a manner that will not create or promote potential breeding and/or harborage of vectors of disease, such as flies, mosquitoes, and rodents. Ensure animal waste is stored properly and removed as often as needed to prevent fly breeding. Manage standing water onsite, including any stormwater management structures, so it will not create mosquito breeding sources.

Timing: The Permittee shall maintain the Project site so as not to contribute to the harborage and/or breeding of potential vectors of disease, nor the creation of a public nuisance throughout the life of the Project.

Monitoring: Ventura County Environmental Health Division (EHD) staff will receive and respond to vector related complaints at the site. The Division will maintain a record of vector related complaints reported to the Division.

Domestic Water

4. The proposed project is for the modification to the CUP for construction of new camper and counselor cabins, new Welcome Center, and new art pavilion. Existing facility has an active permit to purvey water as a non-transient non-community public water system issued by the State Water Resources Control Board, Division of Drinking Water (DDW). Any remodel, addition, upgrade, etc. to the existing water system components or source water must be reviewed and approved by the DDW prior to construction. Compliance with state and local laws will reduce impacts to less than significant.

If you have any questions, please contact me at (805) 654-2830 or Roxy.Cabral@venturacounty.gov.

Roxy Cabral, R.E.H.S.
Land Use Section
Environmental Health Division

VENTURA COUNTY FIRE DEPARTMENT

Fire Prevention Bureau
2400 Conejo Spectrum St. Thousand Oaks, CA 91320
Office (805) 389-9738
fireprevention@ventura.org

MEMORANDUM

DATE:	1/28/2026
TO:	Ventura County
FROM:	Corina Cagley, Fire Prevention Officer
PROJECT NUMBER:	American Jewish University – Camp Alonim Project Draft EIR
LOCATION:	1101 Peppertree Ln, Simi Valley CA 93064
DESCRIPTION:	The Project Applicant requests a Major Modification to Conditional Use Permit No. 1776 and a Discretionary Tree Permit be granted to authorize development of additional facilities at Camp Alonim. Proposed facilities include the following: • Welcome Center: a 4,460 sq. ft. building consisting of a lobby, staff lounge, offices, and meeting rooms; • Camper Cabins: 13 camper cabins, each consisting of 1,930 sq. ft. with two bunkrooms and two bathrooms; • Head Counselor Cabins: three cabins of 441 sq. ft. each; • Arts Pavilion: a 2,307 sq. ft. open-air shade structure for arts and crafts activities; • Parking Lot: a new 58-space parking lot adjacent to the Welcome Center; and • Landscaping: landscaping improvements around the new structures

Draft EIR reviewed by the Ventura County Fire Protection District.

Document description indicates that the Access Road will remain unchanged.

"Peppertree Lane, a private road, provides access to the camp. Peppertree Lane is the southern continuation of Tapo Canyon Road, a major thoroughfare in Simi Valley. Access would remain unchanged with the development of the Project. Water services are provided by the Brandeis-Bardin Mutual Water Company, which receives imported water through the Calleguas Municipal Water District. Wastewater is handled by the City of Simi Valley."

To ensure that adequate fire department access is provided in conformance with current California State Law and Ventura County Fire Protection District Ordinance. The access on High Road will be required to be upgraded where topography allows, to 24 feet with no on-street parking permitted. The applicant has submitted a fire access plan indicating additional turnouts and turnarounds along with the upgraded road where possible to 24 feet.

County of Ventura
Public Works Agency
Engineering Services Department
MEMORANDUM

Date: December 23, 2025

To: Philip Hess, Planning Technician, RMA Planning Division

From: James Maxwell, PG, CEG, Land Development Services

Subject: Grading and Geology Review – Land Development Services

Reference: RMA 25-043 American Jewish University – Camp Alonim Projecf

1. Draft Environmental Impact Report

The Draft Environmental Impact Report (DEIR) has been reviewed for Geology and Grading. The following comments have been provided:

Geology/Grading:

1. Multiple geohazards (seismically induced landslides, liquefaction hazard areas, mapped landslides, fault traces, are mapped throughout the entirety of the project site and areas of proposed development. A geologic and geotechnical engineering investigation shall be performed to address the hazard potential and shall be submitted for review and approval prior to any development. The investigation shall also include any appropriate and sufficient safeguards to be incorporated into the project design.

2 A Grading Permit is required unless sufficient information is submitted to Public Works Agency showing the project is exempt under Section J103.2 of the Ventura County Building Code. Based on the information presented in the Draft EA, a Grading Permit may be required. Information is available on the following website: https://publicworks.venturacounty.gov/es/lds-grading/.

3 ADVISORY: Multiple redline channels exist within the project area. A Watercourse Development Permit is required for any work performed in the channels.

4. ADVISORY: Multiple areas of the site exist within FEMA mapped hazards zones (Zone A). Floodplain Development Permits will be required for any work done in the mapped hazard areas.

PUBLIC VENTURA COUNTY WORKS

WATERSHED PROTECTION

MEMORANDUM

DATE: January 30, 2026

TO: Phillip Hess, RMA Technician, Resource Management Agency - Planning Division

FROM: John Gauthier, Groundwater Specialist, PWA-WP Groundwater Resources Section

SUBJECT: RMA 25-043 Draft Environmental Impact Report (DEIR) - American Jewish University - Camp Alonim

The Ventura County Public Works Agency – Watershed Protection, Water Resources Division, Groundwater Resources Section (GRS) has reviewed the Draft Environmental Impact Report and is providing this memorandum with comments to ensure thorough evaluation of potential impacts relating to groundwater quantity and quality.

PROJECT DESCRIPTION

The Project Applicant, American Jewish University, requests a Major Modification to Conditional Use Permit (CUP) No. 1776 to authorize further development of a camp. The Project includes approximately 41,000 square feet (sq. ft.) of structures including the following: (1) a welcome center; (2) 13 camper cabins; (3) three head counselor cabins; (4) an arts pavilion; (5) a 58-space parking lot; and (6) landscaping improvements. As part of the Project, the number of campers would increase by 100, from 472 to 572 campers. Additionally, the Applicant proposes to increase the frequency of events and number of attendees they may have on the Project Site. Six existing structures would be demolished, and 15 protected trees would be removed to accommodate the Project. The modified CUP would also formally authorize the water system serving the project, the Brandeis-Bardin Mutual Water Company has the necessary water capacity available to supply domestic and firefighting purposes, pursuant to Ventura County Waterworks Manual.

Well Inventory and Status

Utilizing Assessor's Parcel Numbers (APN) provided in Table I-2 of the DEIR, the GRS performed a review of the Ventura County well inventory database. It was determined that the parcels summarized in Table 1 contained one or more wells out of compliance with the Ventura County Ordinance No. 4468 (Ordinance 4468).

Abandoned groundwater wells pose a potentially significant impact to water resources as they create preferential pathways for any overland flows to infiltrate into aquifers. If a well screen is installed over more than one aquifer, hydraulic communication between the aquifers creates the potential for groundwater contamination to extend further.

It is necessary that the potentially significant impact to groundwater quality created by the abandoned wells shown in Table - 1 be included in subsequent EIRs.

Table 1 – Project Site Well Inventory and Status

APN	SWID	Status
685-0-051-040	02N17W18L01S	Abandoned
685-0-051-050	02N17W17M02S	Abandoned
685-0-051-140	02N17W19L01S	Cannot Locate
	02N17W18Q01S	Abandoned
685-0-051-190	02N18W24Q02S	Abandoned
	02N18W24Q01S	Abandoned
685-0-051-210	02N18W24F01S	Abandoned

DEIR Section IV. J HAZARDS AND HAZARDOUS MATERIALS

Paragraph two of PAGE IV.J-13, in Subsection C. - Hydrogeology of the DEIR asserts that a review of several databases and inventories conducted did not identify any wells at the Projects Site. As shown in Table – 1 there are seven wells on the Project Site, consisting of six with a status of Abandoned and one with a status of Cannot Locate.

It is necessary that subsequent EIRs provide an accurate inventory of all wells at the project site and include wells listed in Table -1 from the GRS well inventory database.

If you have any questions, please contact me at (805) 654-5164 or John.Gauthier@venturacounty.gov.

John Gauthier
Groundwater Specialist

PUBLIC WORKS
VENTURA COUNTY

WATERSHED PROTECTION

WATERSHED PLANNING AND PERMITS DIVISION
800 South Victoria Avenue, Ventura, California 93009

M E M O R A N D U M

DATE: December 30, 2025

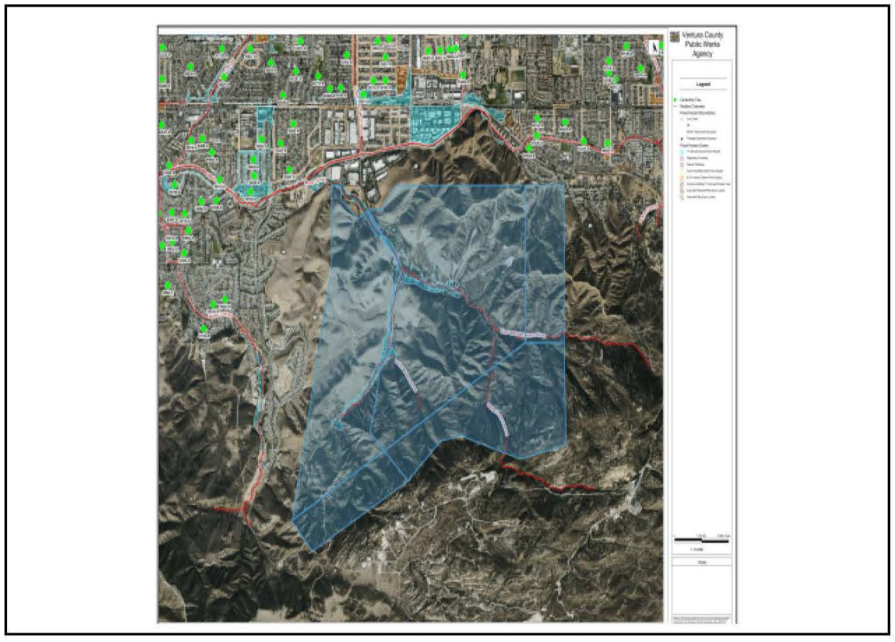
TO: Philip Hess, Case Planner
County of Ventura

FROM: Yunsheng Su, PWA-WP Case Reviewer

SUBJECT: RMA25-043 1101 Peppertree Lane, Simi Valley, CA, 93065
APN:685005104
CEQA Review Comments and Conditions

Pursuant to your request dated 12/22/2025, this office has reviewed the submitted materials and provides the following comments.

PROJECT LOCATION:
1101 Peppertree Lane, Simi Valley, CA, 93065
Location Map:



PROJECT DESCRIPTION:

The Project Applicant requests a Major Modification to Conditional Use Permit No. 1776 and a Discretionary Tree Permit be granted to authorize development of additional facilities at Camp Alonim. Proposed facilities include the following: • Welcome Center: a 4,460 sq. ft. building consisting of a lobby, staff lounge, offices, and meeting rooms; • Camper Cabins: 13 camper cabins, each consisting of 1,930 sq. ft. with two bunkrooms and two bathrooms; • Head Counselor Cabins: three cabins of 441 sq. ft. each; • Arts Pavilion: a 2,307 sq. ft. open-air shade structure for arts and crafts activities; • Parking Lot: a new 58-space parking lot adjacent to the Welcome Center; and • Landscaping: landscaping improvements around the new structures. Three housing trailers, two cottages, and a garage would be demolished to accommodate the new development. The Project would also require the removal of 74 trees, 15 of which are protected. The protected trees to be removed include nine coast live oaks, one sycamore, and five large ornamental trees that are classified as heritage trees. The heritage trees include four pepper trees and one eucalyptus tree. The Project would also encroach upon the protected zones of 67 trees, 42 of which are protected trees. These include 20 oaks, 18 sycamores, and four heritage-sized pepper trees. The total allowed number of camp attendees would increase from 472 (400 for Camp Alonim, 72 for the Brandeis Collegiate Institute) to 572 (500 for Camp Alonim, 72 for the Brandeis Collegiate Institute). The allowable number of events, which are presently limited to 15 days per year on Saturdays and Sundays with up to 300 attendees, would increase to the following: • up to 150 annual event days with attendance of up to 300 people; • up to ten annual event days with attendance of up to 500 people; and • up to six annual event days with attendance of up to 1,000 people. There would be no change to the maximum number of camp staff, which would remain at 200. Peppertree Lane, a private road, provides access to the camp. Peppertree Lane is the southern continuation of Tapo Canyon Road, a major thoroughfare in Simi Valley. Access would remain unchanged with the development of the Project. Water services are provided by the Brandeis-Bardin Mutual Water Company, which receives imported water through the Calleguas Municipal Water District. Wastewater is handled by the City of Simi Valley. As part of the Major Modification, the Conditional Use Permit's scope will also be expanded to include authorization of all existing and proposed Brandeis-Bardin Mutual Water Company facilities. The proposed project would also extend the life of the Conditional Use Permit for the camp and associated uses. Presently, the Conditional Use Permit is set to expire in 2042. As proposed, the permit would be extended indefinitely and would not have an expiration date.

APPLICATION COMPLETENESS:

Complete - from our area of concern.

ENVIRONMENTAL IMPACT ANALYSIS:

Item 31a. Flood Control Facilities/Watercourses – Ventura County Public Works Agency, Watershed Protection is deemed to be Less Than Significant.

The proposed project is situated about 10 feet from the East Tributary Meier Canyon, which is a WP jurisdictional redline channel. The applicant's submitted materials indicate new or modified direct stormwater drainage connections to this WP channel, activities within the WP's easement, or activities over, under, or within the redline channel have been proposed. A Watercourse/Encroachment Permit must be obtained from WP.

The proposed development shall incorporate mitigation measures to address cumulative impacts due to the proposed increase in imperviousness. It is understood that impacts from the proposed increase in impervious area and stormwater drainage design within the project site will be required to be mitigated to less than significant under the conditions imposed by County of Ventura (the Lead Agency). WP will review the mitigation measures in detail during the permitting process. Project shall not increase peak storm runoff in the 10-, 25-, 50-, and 100-yr storms consistent with District policy and WP-2 Ordinance.

WP staff determines that the proposed project design with the conditions mentioned above mitigates the direct and indirect project-specific and cumulative impacts to flood control facilities and watercourses. Therefore, the environmental impact is less than significant (LS) on redline channels under the jurisdiction of the Ventura County Public Works Agency - Watershed Protection.

Item 17b. Hydraulic Hazards - FEMA is deemed to be Less Than Significant.

The project site is in a location identified by the Federal Emergency Management Agency (FEMA) as an area of Special Flood Hazard Area Zone A. This is evidenced on FEMA Map Panel 06111C0864E effective January 20, 2010. Therefore, the project must comply with the County of Ventura Floodplain Management Ordinance, which provides minimum standards for development in the Special Flood Hazard Area. The proposed development with the condition described below is therefore, deemed to be Less than Significant for Hydraulic Hazards - FEMA.

WATERSHED PROTECTION COMMENTS:

None.

WATERSHED PROTECTION CONDITIONS:

Watercourse/Encroachment Permit

Purpose: To comply with the Ventura County Watershed Protection District (County) Ordinance, and mitigate potential impacts such as obstructing, impairing, diverting, impeding, or altering the characteristics of the flow of water to jurisdictional channels by designing and constructing appropriate surface drainage and flood control facilities to protect life and property from damage or destruction from flood and storm waters.

Requirement: The Permittee shall obtain a Watercourse/Encroachment Permit. The permit application shall include the following:

a. Construction plans prepared, signed, and stamped by a California licensed civil engineer including but not limited to, a site plan depicting general drainage trends, existing and proposed topography with elevations, proposed improvements in both plan and profile, and construction details that meet the standards of the County of Ventura and the WP.

b. Site specific hydrology for existing and proposed conditions that conforms to the WP's Hydrology Manual.

c. Hydraulics using a methodology and/or computer model applicable to the proposed improvements and acceptable to the WP. The final model shall confirm there are no adverse impacts to East Tributary Meier Canyon including no loss of storage volume and no increase in water surface elevation for the 1-percent chance flood peak discharge on adjacent parcels.

d. Any other information or studies required by the Permit Section to administer the requirements of watershed Ordinance WP-2.

Documentation: A WP Permit application package shall be prepared and signed by the Permittee or a duly authorized agent and submitted to and logged by the WP Permit Section.

Timing: The applicant shall obtain an encroachment permit prior to obtaining a building permit or grading permit or prior to project start date if no grading or building permits are required.

Monitoring and Reporting: Prior to permit closure, WP staff shall inspect the improvements to assure that construction was completed, in accordance with the approved plans and the Permit.

Floodplain Development Permit
Purpose: To comply with the Ventura County Floodplain Management Ordinance and Ventura County General Plan policies HAZ-2.1, HAZ-2.2, HAZ-2.3 and HAZ-2.5.

Requirement: The Permittee shall obtain a Floodplain Development Permit from the Ventura County Public Works Agency Floodplain Manager.

Documentation: A Floodplain Development Permit issued by the Public Works Agency Floodplain Manager.

Timing: The Floodplain Development Permit shall be obtained by the Applicant prior to issuance of a building permit or prior to ground disturbance if a building permit is not required.

Monitoring and Reporting: A copy of the approved Floodplain Development Permit shall be provided to the Building and Safety Department as well as maintained in the case file by the Public Works Agency.

Elevation Certificate
Purpose: To comply with the Ventura County Floodplain Management Ordinance and Ventura County General Plan policies HAZ-2.2 and HAZ-2.5 by obtaining an elevation certificate.

Requirement: The Permittee shall provide Elevation Certificate for each permitted structure.

Documentation: The Elevation Certificate(s) prepared by a licensed Civil Engineer or Licensed Public Land Survey.

Timing: The Elevation Certificate(s) shall be prepared prior to occupancy.

Monitoring and Reporting: A copy of the approved Elevation Certificate(s) shall be provided to the Building and Safety Department as well as maintained in the case file by the Public Works Agency.

If you have any questions, please feel free to contact me by email at Yunsheng.Su@Ventura.Org or by phone at 805-654-2005.

END OF TEXT.

Los Angeles Regional Water Quality Control Board

January 30, 2026

Susan Curtis
Assistant Planning Director
County of Ventura
800 South Victoria Avenue
Ventura, Ca 93009

COMMENT LETTER TO THE DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE AMERICAN JEWISH UNIVERSITY-CAMPL ALONIM PROJECT

Dear Ms. Cutis,

Thank you for the opportunity to comment on Los Angeles County Department of Regional Planning's Draft Environmental Impact Report for the American Jewish University-Alonim Project (project). The proposed project would involve the development of additional facilities at Camp Alonim in the Simi Valley area of Ventura County. The would include a 4,460 sq. ft welcome center, 13 camper cabins, head counselor cabins, art pavilion, 58 space parking lot and landscaping.

Our comments are submitted in compliance with CEQA *Guidelines* §15096, which requires California Environmental Quality Act responsible agencies to focus on shortcomings in the Draft Environmental Impact Report (DEIR), and on additional alternatives or mitigations which should be included.

The State Water Board and the Regional Water Quality Control Boards (RWQCB) regulate discharges to protect the quality of water of the State, broadly defined as "the chemical, physical, biological, bacteriological, radiological, and other properties and characteristics of water which affects its use"[1]. If the proposed project has any of the following discharges, the project proponent is required to obtain a permit from the State or Regional Water Boards:

Discharge Type	**Types of Permits involved**
• Discharge of dredge and fill materials	- Clean Water Act (CWA) §401 water quality certification for federal waters; or Waste Discharge Requirements for non-federal waters.

[1] California Water Code, §13050.

Discharge Type	Types of Permits involved
• Wastewater discharges	- CWA §402 National Pollutant Discharge Elimination System permit, e.g. storm water permit.
• Other discharges	- Waste Discharge Requirements or other permits for discharges that may affect groundwater quality and other waters of the State, such as operation of proposed solid waste transfer facilities, and other proposed project activities.

Discharges into impaired waters of the State may contribute or exasperate existing impaired waters and may serve to cause and contribute loading to downstream waters as well.

Early consultation is encouraged, as project reconfiguration may be required to avoid and minimize impacts to State waters, this included ephemeral waters.

In regards to Water and Wetlands Regulations, the draft EIR does not address the full regulatory authority of the Los Angeles Regional Water Quality Control Board (Los Angeles Water Board). The Draft EIR erroneously only discusses the need for a RWQCB 401 Certification, which "is triggered whenever a USACE 404 Permit is required, or whenever an activity could cause a discharge of dredged or fill material into water of the U.S. or wetlands" (Page IV.E-8). The appears to assume that the jurisdiction of the Los Angeles Water Board is the same as the jurisdiction of the U.S. Army Corps of Engineers (USACE). It is important to note in the draft EIR, that in addition to the Waters of the US, the Los Angeles Water Board also has jurisdiction over ephemeral waters (including the ones located at the project site) under the Porter-Cologne Act. Impacts on resources classified as Waters of the State (but not Waters of the US) are required to have a Waste Discharge Requirements permit. The project proponents should coordinate with RWQCB staff to determine the state jurisdictional boundaries for this project, under both the Clean Water Act and the Porter Cologne Act.

Please be aware, as a permitting authority, the Los Angeles Water Board has the discretion to approve a project only if the applicant has demonstrated the following:

a. A sequence of actions has been taken to first avoid, then to minimize, and lastly compensate for adverse impacts that cannot be practicably avoided or minimized to waters of the state;

b. The potential impacts will not contribute to a net loss of the overall abundance, diversity, and condition of aquatic resources in a watershed

(or multiple watersheds when compensatory mitigation is permitted in another watershed)

c. The discharge of dredged or fill material will not violate water quality standards and will be consistent with all applicable water quality control plans and policies for water quality control; and

d. The discharge of dredged or fill material will not cause or contribute to significant degradation of waters of the state.

Again, thank you for this chance to comment. We welcome the opportunity to work with you and the project proponent on this project. If we may clarify any of our comments or be of further assistance, please contact Man Voong or Celine Gallon by email at Man.Voong@waterboards.ca.gov or Celine.Gallon@waterboards.ca.gov.

Sincerely,

Elisha Wakefield

Elisha Wakefield
Senior Environmental Scientist
Elisha.Wakefield@waterboards.ca.gov
213-576-6785

From: Cagley, Corina
To: Conger, Michael
Subject: Draft EIR editorial comments Camp Alonim
Date: Thursday, January 29, 2026 11:06:07 AM
Attachments: image001.png
image002.png
image003.png
image004.png
image005.png
Draft EIR American Jewish University Camp Alonim Project.docx

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Hello Michael,

Please see the below editorial comments from Fire for the American Jewish University Camp Alonim and the memo for Non-County RMA input.

-

J. Hazards and Hazardous Materials

page IV.J-3

Federal Regulatory Setting - vi)

Comment: Uniform Fire Code shouldn't be under Federal and VCFD didn't adopt IFC until 2003. Not a federal code located in the wrong area, and we don't use the UFC should be State and local adoptions.

M. Public Services Utilities and Services System

Page IV.M-2

11) Ventura County Fire Code

Comment: Update Ordinance 34. (not subject to 2022 code). Update footnote 2 to eliminate the statement project is currently subject to 2022 code is incorrect. Subject to the 2025 codes that are effective 2026.

Page 384- IV.M-3

a. Existing Conditions

Comment: Add Santa Paula as the 7th city which was effective 2018. (Not 10) First paragraph corrected also change square miles and populations to reflect added S.P City.

Comment: add rescue ambulances, some stations have paramedics.

Page 386 IV.M-5

Impact Fire-1

Comment: Add: In paragraph- Additional Road widening High Road where possible to 24 feet with turnouts and turnarounds for emergency vehicles.

Comment: Add: Mitigation Measures under Requirement: Additional Road widening High Road where possible to 24 feet with turnouts and turnarounds for emergency vehicles

-

R. Wildfire

page 444 IVR-1

Regulatory Setting

a. Federal

This is not a Federal Regulation first paragraph,

- The Project Site is located within a State Responsibility Area (SRA)for purposes of fire protection (i.e., an area where the state government is responsible for wildfire protection), and therefore, federal wildfire regulations do not apply to the Project Site or within the immediate area (This statement is okay). The Federal National Incident Management System (NIMS) provides a shared vocabulary, systems, and processes to prevent, protect against, mitigate, respond to and recover from disaster, and is relevant should a wildfire event become extraordinary and require federal support. NIMS is intended to standardize response to emergencies involving multiple jurisdictions or multiple agencies and is complementary to the State Standardized Emergency Management System (SEMS). Both systems utilize the Incident Command System (ICS) as their core field operations protocol so that all parties are essentially speaking the same language.

- NIMS has nothing to do with Wildfire- It's the ICS System nothing to do with Wildfire.

b) State

i) California Fire Code

Comment: State in this paragraph that it's in an SRA Very High Zone. CFC does not address access, that is a local ordinance, also reference VCFD Ordinance in this paragraph. Note: WUI Code - Building and Safety enforces the WUI Code Part 7 of the California Building Standards Code.

Page 445 IV.R-2

B. Fire Hazard Severity Zones-

- identify where the FHSZs area are.

Page 448 IV.R-5

iii) Ventura County Fire Department

Comment: (Ordinance 32, updating Chapter 49 of the Fire Code (effective January 1, 2023), Update first paragraph- Ordinance 34 adopts the CA WUI code with local amendments.

- Ventura County Fire Code applies, and the Ventura County Wildland Urban Interface Code applies- article 3 and article 4 of Ordinance 34.
- Remove Footnote 3 -Must meet current code when applying for building permits.

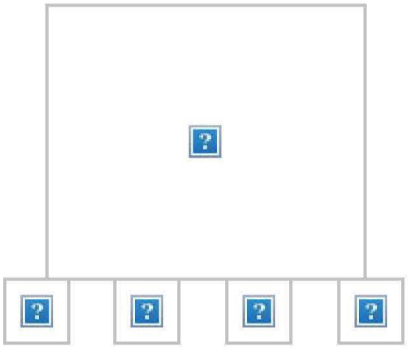
Requirements for defensible space must meet the current code in effect, at time of application or installation of landscape.

Page 454 IV.R-11

Comment: Update bulleted items bottom page to include- Additional Road widening High Road where possible to 24 feet with turnouts and turnarounds for emergency vehicles.

Page 457 IV.R-14 & IV.R-10

Comment: Impact WF-1 & WF-3 also add: Additional Road widening High Road where possible to 24 feet with turnouts and turnarounds for emergency vehicles.



Corina Cagley
Assistant Fire Marshal
2400 Conejo Spectrum Street
Thousand Oaks, CA 91320
(805) 947-8518 Mobile

Corina.Cagley@venturacounty.gov

Docusign Envelope ID: 9D3AB083-1F67-40AA-AD49-EB8B8BC44807

February 6, 2026

VIA EMAIL

Mr. Micheal Conger, Permit Planner
County of Ventura – Planning Agency
800 South Victoria Avenue
Ventura, CA 93009
Michael.Conger@venturacounty.gov

Assessor Parcel Number(s): SCH Number 2023110297
Property Owner(s): American Jewish University
Project Location Address: 34°15'21.0"N 118°42'17.6"W, Tapo Canyon Road and Guardian Street, Simi Valley, CA 93010

PROJECT TITLE: SCH 2023110297 – AMERICAN JEWISH UNIVERSITY - CAMP ALONIM PROJECT

Public Resources Code (PRC) section 3208.1 establishes re-abandonment responsibility when previously plugged and abandoned oil, gas or geothermal wells will be impacted by planned property development or construction activities. Local permitting agencies, property owners, and/or developers should be aware of, and fully understand, that significant and potentially dangerous issues may be associated with development near previously abandoned oil, gas, and geothermal wells.

The California Geologic Energy Management Division (CalGEM) has received the above-referenced project, dated December 16, 2025. To assist local permitting agencies, property owners, and developers in making safe and practical land use decisions regarding potential development near oil, gas, or geothermal wells, CalGEM provides a table in the attached enclosure of the wells within the parcel boundary or in its vicinity, based on CalGEM's Well Finder database (https://maps.conservation.ca.gov/doggr/wellfinder/).

Docusign Envelope ID: 9D3AB083-1F67-40AA-AD49-EB8B8BC44807

CalGEM categorically advises against building over, or in any way impeding access to, oil, gas, or geothermal wells. Impeding access to a well could result in the need to remove any structure or obstacle that prevents or impedes access including, but not limited to, buildings, housing, fencing, landscaping, trees, pools, patios, sidewalks, roadways, and decking at the landowner's expense if there is a need to access a well. Maintaining sufficient access is considered the ability for a well servicing unit and associated necessary equipment (consisting of well servicing rig, pumping equipment, pipe trailer) to reach a well from a public street or access way, solely over the parcel on which the well is located. A well servicing unit, and any necessary equipment, should be able to pass unimpeded along and over the route, and should be able to access the well without disturbing the integrity of surrounding infrastructure. Impermeable barriers such as asphalt, concrete, and plastic may trap hazardous gases and liquids underneath and could create a safety hazard if built over a well that later develops a leak.

CalGEM recommends that any well for which access is impeded or built over, against CalGEM's advice, should be evaluated by a qualified petroleum professional for compliance with the statutory objectives of isolating all hydrocarbon-bearing strata; protecting underground and surface waters; prevention of subsequent damage to life, health, property, and other resources; and prevention of loss of oil, gas, or reservoir energy. CalGEM recommends that wells that do not meet these standards are abandoned or re-abandoned prior to construction. The well information can be accessed through CalGEM's Well Finder database mentioned above. PRC section 3208, subdivision (a), provides the primary statutory authority for CalGEM to oversee adequate abandonment of wells. Additionally, CalGEM has developed the regulatory guidance for operators to be followed during well abandonment, which are listed within California Code of Regulation, title 14 (CCR) section 1723 and associated sub-sections (for onshore wells), and section 1745 and associated sub-sections (for offshore wells).

There is no guarantee that a well abandoned in compliance with current Division requirements as prescribed by law will not start leaking in the future. Due to the inability to predict all subsurface conditions or changes, it always remains a possibility that any well may start to leak oil, gas, and/or water after abandonment, no matter how thoroughly the well was plugged and abandoned. CalGEM acknowledges wells plugged and abandoned to the most current Division requirements as prescribed by law have a lower probability of leaking in the future, however there is no guarantee that such abandoned wells will not leak.

CalGEM advises that all wells identified on the development parcel prior to, or during, development activities be tested for liquid and gas leakage. Surveyed locations in Latitude and Longitude, NAD 83 decimal format, and leak testing results should be provided to CalGEM. CalGEM expects any wells found leaking to be reported to CalGEM immediately.

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PRC section 3208.1 gives CalGEM the authority to order or permit the re-abandonment of any well where it has reason to question the integrity of the previous abandonment. Responsibility for re-abandonment costs may be affected by the choices made by the local permitting agency, property owner, and/or developer in considering the general advice set forth in this letter. The PRC continues to define the person or entity responsible for re-abandonment as:

1. The property owner - If the well was plugged and abandoned in conformance with Division requirements at the time of abandonment, and in its current condition does not pose an immediate danger to life, health, and property, but requires additional work solely because the owner of the property on which the well is located proposes construction on the property that would prevent or impede access to the well for purposes of remedying a currently perceived future problem, then the owner of the property on which the well is located shall obtain all rights necessary to re-abandon the well and be responsible for the re-abandonment.

2. The person or entity causing construction over or near the well - If the well was plugged and abandoned in conformance with Division requirements at the time of plugging and abandonment, and the property owner, developer, or local agency permitting the construction failed either to obtain an opinion from the supervisor or district deputy as to whether the previously abandoned well is required to be re-abandoned, or to follow the advice of the supervisor or district deputy not to undertake construction that impedes access, then the person or entity causing the construction over or near the well shall obtain all rights necessary to re-abandon the well and be responsible for the re-abandonment.

3. The party or parties responsible for disturbing the integrity of the abandonment - If the well was plugged and abandoned in conformance with Division requirements at the time of plugging and abandonment, and after that time someone other than the operator or an affiliate of the operator disturbed the integrity of the abandonment in the course of developing the property, then the party or parties responsible for disturbing the integrity of the abandonment shall be responsible for the re-abandonment.

Docusign Envelope ID: 9D3AB083-1F67-40AA-AD49-EB8B8BC44807

Should any wells require abandonment or re-abandonment, the responsible party must submit a Notice of Intention (NOI) to CalGEM through WellSTAR. The NOI form can be accessed in the 'Plugging and Abandonment' section of the following link: https://www.conservation.ca.gov/calgem/for_operators. No well work may be performed on any oil, gas, or geothermal well without written approval from CalGEM. Well work requiring approval includes, but is not limited to, mitigating leaking gas or other fluids from abandoned wells, modifications to well casings, and/or any other re-abandonment work. CalGEM also regulates the top of a plugged and abandoned well's minimum and maximum depth below final grade. CCR section 1723.5 states well casings shall be cut off at least 5 feet but no more than 10 feet below the surface of the ground. If any well needs to be lowered or raised (i.e. casing cut down or casing riser added) to meet this regulation, a permit from CalGEM is required before work can start.

CalGEM makes the following additional recommendations to the local permitting agency, property owner, and developer:

1. To ensure that present and future property owners are aware of (a) the existence of all wells located on the property, and (b) potentially significant issues associated with any improvements near oil or gas wells, CalGEM recommends that information regarding the below identified well(s), and any other pertinent information obtained after the issuance of this letter, be communicated to the appropriate county recorder for inclusion in the title information of the subject real property.

2. CalGEM recommends that any soil containing hydrocarbons be disposed of in accordance with local, state, and federal laws. Please notify the appropriate authorities if soil containing significant amounts of hydrocarbons is discovered during development.

As indicated in PRC section 3106, CalGEM has statutory authority over the drilling, operation, maintenance, and abandonment of oil, gas, and geothermal wells, and attendant facilities, to prevent, as far as possible, damage to life, health, property, and natural resources; damage to underground oil, gas, and geothermal deposits; and damage to underground and surface waters suitable for irrigation or domestic purposes. In addition to CalGEM's authority to order work on wells pursuant to PRC sections 3208.1 and 3224, it has authority to issue civil and criminal penalties under PRC sections 3236, 3236.5, and 3359 for violations within CalGEM's jurisdictional authority. CalGEM does not regulate grading, excavations, or other land use issues.

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If you have any questions, or if any wells are encountered that were not part of this letter, contact CalGEM at (805) 465-9623 or CalGEMNorthern@conservation.ca.gov.

Sincerely,

Amir Mohseni

Amir Mohseni
Supervising Oil and Gas Engineer

RO:IA:es

Enclosure

cc: Chrono
CSWR
Well Record

Docusign Envelope ID: 9D3AB083-1F67-40AA-AD49-EB8B8BC44807

Enclosure: The wells listed below are reported to be located within and nearby the parcel boundary and may have future access impeded.

API No.	**Well Name**
111-05666	"Well No." 1
111-05626	"Barndies" 1

Charles Lange
2678 Lakeshore Blvd.
Lakeport, CA 95453

December 5, 2023

Re: Conditional Use Permit for American Jewish University – Camp Alonim Project
Case Number PL22-0032

To Whom It May Concern:

Please be advised that I am part owner of the 6.2 acre parcel located at 5586 Island Oak Street in the City of Simi Valley directly North of the above referenced Project. In this regard, it is absolutely imperative to the residents in the surrounding area of my property that they be given a legal secondary access in and out of the above referenced project for fire safety purposes in exchange for allowing the above referenced development any additional access through our neighborhoods. Presently, our neighborhood is only served by a single primary source of ingress and egress, failing to meet the current fire safety standards established for neighborhoods like ours. Any approval of the above referenced project could materially adversely affect our neighborhood's fire escape routes in the event of an emergency placing lives at risk. Therefore, the above referenced development must provide both itself as well as our neighborhood with a legal secondary access to meet current fire safety standards. It would be completely unacceptable to allow the scope of traffic potentially generated by the proposed development above without improving fire accessibility for both our neighborhood as well as for the American Jewish University.

The owners of 5586 Island Oak Street have been waiting for many years to develop their property with only 21 additional homes added to the area. Based upon average per unit occupancy in the area pursuant to the most recent census data, such a development would only increase the population accessing the area by 60 people. Meanwhile, the American Jewish University is proposing a development that could increase traffic through our neighborhood by more than 1,000 people for a given event. It is inconceivable that such a development could be allowed without a fully legal reciprocal secondary access so that both our neighborhood as well as the American Jewish University can meet current fire safety standards.

Thank you very much,

Charles Lange

9/25/24

Mr. Michael Conger
Senior Planner
County of Ventura
800 S. Victoria Ave.
Ventura, CA 93009

RE: Case #PL22-0032 (Proposed Major Mod to CUP No. 1776)

According to the Subdivision Survey Report Dated November 30, 2021 (required pursuant to AB 2911), for the Hidden Park Subdivision – Subdivision I. D. 21-XVE-0558, this subdivision is in a Very High Fire Hazard Severity Zone and requires a Secondary Major Access Road for Ingress and Egress. In this regard, it is incumbent upon the local authorities at all levels to make any reasonable efforts to provide a Secondary Major Access for Ingress and Egress for the Hidden Park Subdivision. Under no circumstances should the American Jewish University – Camp Alonim Project Proposed Major Modification to the Conditional Use Permit be given any consideration unless the American Jewish University is required to provide a fully acceptable Secondary Major Access Road for the benefit of the Hidden Park Subdivision and the American Jewish University. The American Jewish University must not be permitted to add any additional traffic that might flow through the Hidden Park Subdivision in conjunction with its Proposed Major Modification to its Conditional Use Permit without providing a Secondary Major Access Road to serve both projects. Without such a fully approved Secondary Major Access Road serving both projects, the American Jewish University – Camp Alonim Project Proposed Major Modification to its Conditional Use Permit should be enjoined fromfurther consideration until all of the Part III – Recommendations in the Hidden Park Subdivision Survey Report Dated November 30, 2021, are met in full.

Section 1270 and Section 1273 of the State Minimum Fire Safe Regulations, 2021 (14CCR) clearly requires that the Proposed Major Modification to the Conditional Use Permit of the American Jewish University be subject to the provisions requiring a Secondary Major Access Road. This would apply to its intended increase in traffic through its own campus as well as any intended increase in traffic through the Hidden Park Subdivision. In this regard, it is

reasonably clear that any approval of this Proposed Major Modification to the Conditional Use Permit of the American Jewish University would constitute a violation of existing law without providing for a Secondary Major Access Road to serve both areas materially impacted by increased traffic particularly in view of the Very High Fire Hazard Severity Zone in which both projects are located.

The Hidden Park Subdivision must not be required to support any additional traffic from the American Jewish University – Camp Alonim Project Proposed Major Modification to its Conditional Use Permit under any circumstances without the creation of a Secondary Major Access Road, which the Hidden Park Subdivision could also use as Secondary Major Access Road for Ingress or Egress that would allow for safe evacuation in event of a major wildfire event. This could be accomplished by an approved Security Gate which swings in both directions allowed pursuant to Section 1273.03 (b). Such a solution would solve the Secondary Access Requirement for the American Jewish University as well as the Hidden Park Subdivision which is being materially adversely impacted by increased traffic directly attributable to the Proposed Major Modification to the Conditional Use Permit by the American Jewish University so that both developments could meet the requirements of AB 2911. It is clear under the law that the increased traffic through the Hidden Park Subdivision makes it mandatory for the American Jewish University to provide a two way means of Ingress and Egress that meets current Secondary Access Requirements for both projects. The material increase in fire hazard to the Hidden Park Subdivision must be mitigated under the law in conjunction with the approval of the Major Modification of the Conditional Use Permit presently requested by the American Jewish University.

The primary purpose of AB 2911 is too provide regular evaluations every 5 years of subdivisions within Very High Fire Hazard Severity Zones such as the Hidden Park Subdivision with clear recommendations for bringing such subdivisions into compliance with greater fire safety. As stated above, the Subdivision Survey Report Dated November 30, 2021, for the Hidden Park Subdivision specifically states that a Secondary Major Access Road for Ingress and Egress is required for the Hidden Park Subdivision without the addition of significantly increased fire hazard directly attributable to the Proposed Major Modification to the Conditional Use Permit by the American Jewish University. Permitting the increased traffic and fire hazard risk to the residents of the Hidden Park Subdivision would be irresponsible without mandating a requirement for a Secondary Major Access Road that can serve both the American Jewish University and the Hidden Park Subdivision. In this regard, we wholeheartedly agree with the intent of AB 2911 Section 4290.5 (a), (b), (c), (d), (e) and CCR 14, Sections 1267.00, 1267.01, 1267.02 and 1267.03 which strongly recommends that CalFire requires a Secondary Major Access Road for Ingress or Egress for the Hidden Park Subdivision before any additional traffic or fire risk is permitted to occur as a result of the Proposed Major Modification to the

Conditional Use Permit by the American Jewish University.

Sincerely,

Ashley Holmes as P.O.A. for the Constance S. Holmes Family Trust

Charles Lange

Donald W. Vander Horck and Loren J. Vander Horck as Trustees for the Don and Loren Vander Horck Family Trust dated 12/8/22

Loren J. Vander Horck

Gary S Seaton

From: Ashley Holmes <asholmes1234@gmail.com>
Sent: Friday, September 27, 2024 12:06 PM
To: Gary S Seaton
Cc: Rob or ICE
Subject: Holmes signature

September 27, 2024
Hi Gary, thanks for your phone call today.
Here is the signed paper for the discussion this coming Monday about the conditional use permit by the American Jewish University.
Thanks, Ashley Holmes
Trustee for the Constance Holmes Family Trust

Conditional Use Permit

Sincerely,

Ashley Holmes

Ashley Holmes as ~~P.O.A~~ Truste

Charles Lange

Donald W. Vander Horck

Loren Vander Horck Fami

Conditional Use Permit by the American Jewish University.

Sincerely,

Ashley Holmes as P.O.A. for the Constance S. Holmes Family Trust

Charles Lange

Donald W. Vander Horck and Loren J. Vander Horck as Trustees for the Don and Loren Vander Horck Family Trust dated 12/8/22

Version 1.6

Subdivision Survey Report

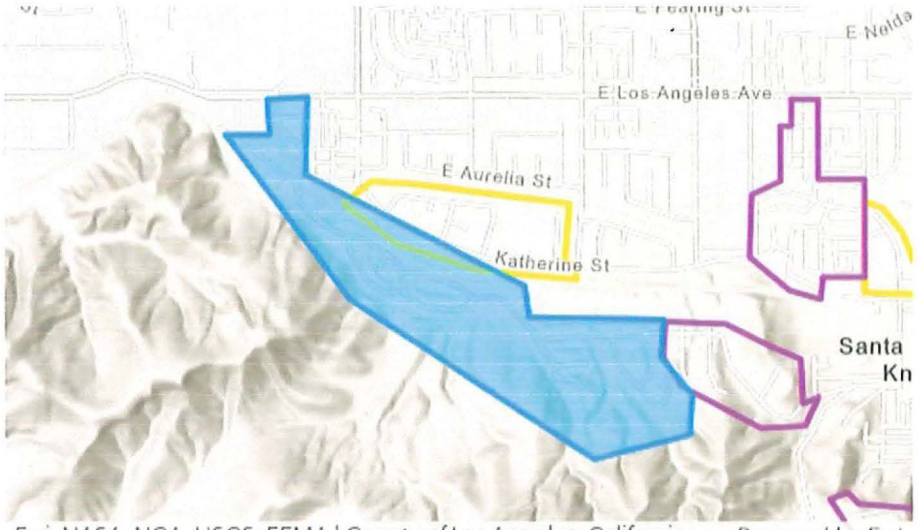
Part I: Site Information

Subdivision Information

Subdivision Name: Hidden Park
Subdivision ID: 21-XVE-0558

Subdivision is located within:	*Responsibility Area*	*Fire Hazard Severity Zone*
	LRA	Very High

Map: Hidden Park



Address: 5065 Hidden Park Ct
City: Simi Valley

County: Ventura

CALFIRE Administrative Unit:
VNC - Ventura County

CAL FIRE Unit Contact:
Larry Williams

Local Planning Director:
Lorri Hammer

Local GIS Coordinator:
Faron Bowman

Local Government Fire Marshal:
Massoud Araghi

Primary Fire Protection Agency: County Fire Department

Comments: VCFD

Part II: Site Information and Fire Survey

Subdivision Description

Date Surveyed: November 30, 2021

Estimated number of dwelling units 200

Survey Results

Type(s) of vegetation within and around the subdivision (check all that apply):

- ☑ Grass
- ☑ Brush
- ☑ Trees
- ☐ Timber
- ☐ Other:

Comments:

Topographic features within and around the subdivision (check all that apply):

- ☑ Canyon
- ☑ Chimneys
- ☑ Mid-slope
- ☑ Slope Setback
- ☑ Saddle
- ☐ Ridge Top
- ☐ Flat Land

Comments:

Residential structure types identified (check all that apply):

- ☑ Single Family
- ☐ Duplex
- ☑ Townhomes
- ☑ Apartments
- ☐ Mobile/Manufactured
- ☐ Other:

Comments:

Identified water source(s) availability (check all that apply):

- ☑ Hydrants
- ☐ Draft Hydrants
- ☐ Private Water Tanks
- ☐ No Water Source
- ☐ Wharf Hydrant

Comments:

Access and Evacuation

Is there a secondary egress route in the subdivision? (PRC 4290.5, 14 CCR 1267.01(a)(i)(ii))

☐ Yes ☑ No

Is the secondary egress route navigable by a passenger vehicle weighing 6,000 pounds or less, of equal construction standard of the primary road? (14 CCR 1267.01(a)(i))
Note: The secondary road does not have to be rated to carry the same quantity of traffic (e.g., a two-lane paved road and a one-lane paved road is acceptable).

☐ Yes ☑ No

Is there another road with locked gates or limited access; or a road that directs traffic to the same outlet road as the primary road or results in a circular traffic flow, to the extent practicable? (14 CCR 1267.01(a)(ii))

☐ Yes ☑ No

Comments:

Part III: Recommendations

Access and Evacuation Recommendations (check all that apply):

☑ **Create a secondary access to the subdivision.**

☐ **Make improvements to the existing secondary access to the subdivision.**

☐ **Install reflective addressing signs for structures and roads in conformance with 14 CCR § 1274.01, 1274.02, 1274.03, and 1274.04 and the California Fire code, California Code of Regulations, title 24, part 9.**

☑ **Install reflective evacuation route street signs directing residents from their local roads to the nearest collector road(s) and/or arterial highway(s) (see California Highway Design manual for definitions), based on the standards for emergency management signing in the California Manual on Uniform Traffic Control Devices**

☐ **Where additional routes may exist, but with a gate that does not conform to the requirements in 14 CCR § 1273.09, recommend that gates (including private gates) remain unlocked during red flag warnings or high fire danger conditions.**

☑ **When side street parking narrows the road to a smaller width than the standards in 14 CCR § 1273.01, during red flag warnings or conditions of high fire danger, limit street parking so a wider pathway is available to support rapid evacuation.**

☑ **Conduct community-wide evacuations drills.**

☑ **Install reflective markers to indicate road edges or other areas of danger that might not be evident during periods of low visibility.**

Comments:

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State Minimum Fire Safe Regulations

Board of Forestry and Fire Protection





FOR INFORMATIONAL USE ONLY
View the official California Code of Regulations online at govt.westlaw.com/calregs

As of April 1, 2023

California Code of Regulations
Title 14 Natural Resources
Division 1.5 Department of Forestry
Chapter 7 - Fire Protection
Subchapter 2 State Minimum Fire Safe Regulations
Articles 1-5

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Article 1 Administration

§ 1270.00. Title

Subchapter 2 shall be known as the "State Minimum Fire Safe Regulations," and shall constitute the minimum Wildfire protection standards of the California Board of Forestry and Fire Protection.

§ 1270.01. Definitions

The following definitions are applicable to Subchapter 2.
(a) Agriculture: Land used for agricultural purposes as defined in a Local Jurisdiction's zoning ordinances.
(b) Board: California Board of Forestry and Fire Protection.
(c) Building: Any Structure used or intended for supporting or sheltering any use or Occupancy, except those classified as Utility and Miscellaneous Group U.
(d) CAL FIRE: California Department of Forestry and Fire Protection.
(e) Dead-end Road: A Road that has only one point of vehicular ingress/egress, including cul-de-sacs and Roads that loop back on themselves
(f) Defensible Space: The area within the perimeter of a parcel, Development, neighborhood or community where basic wildland fire protection practices and measures are implemented, providing the key point of defense from an approaching Wildfire or defense against encroaching Wildfires or escaping Structure fires. The perimeter as used in this regulation is the area encompassing the parcel or parcels proposed for construction and/or Development, excluding the physical Structure itself. The area is characterized by the establishment and maintenance of emergency vehicle access, emergency water reserves, Road names and Building identification, and fuel modification measures.
(g) Development: As defined in section 66418.1 of the California Government Code.
(h) Director: Director of the Department of Forestry and Fire Protection or their designee.
(i) Driveway: A vehicular pathway that serves no more than four (4) Residential Units and any number of non-commercial or non-industrial Utility or Miscellaneous Group U Buildings on each parcel. A Driveway shall not serve commercial or industrial uses at any size or scale.
(j) Exception: An alternative to the specified standard requested by the applicant that may be necessary due to health, safety, environmental conditions, physical site limitations or other limiting conditions, such as recorded historical sites, that provides mitigation of the problem.
(k) Fire Apparatus: A vehicle designed to be used under emergency conditions to transport personnel and equipment or to support emergency response, including but not limited to the suppression of fires.
(l) Fire Authority: A fire department, agency, division, district, or other governmental body responsible for regulating and/or enforcing minimum fire safety standards in the Local Jurisdiction.
(m) Fire Hydrant: A valved connection on a water supply or storage system for the purpose of providing water for fire protection and suppression operations.
(n) Fuel Break: A strategically located area where the volume and arrangement of vegetation has been managed to limit fire intensity, fire severity, rate of spread, crown fire potential, and/or ember production.
(o) Greenbelts: open space, parks, wildlands, other areas, or a combination thereof, as designated by Local Jurisdictions, which are in, surround, or are adjacent to a city or urbanized area, that may function as Fuel Breaks and where Building construction is restricted or prohibited.
(p) Greenways: Linear open spaces or corridors that link parks and neighborhoods within a community through natural or manmade trails and paths.

(q) Hammerhead/T: A "T" shaped, three-point Turnaround space for Fire Apparatus on a Road or Driveway, being no narrower than the Road or Driveway that serves it.
(r) Hazardous Land Use: A land use that presents a significantly elevated potential for the ignition, prolonged duration, or increased intensity of a Wildfire due to the presence of flammable materials, liquids, or gasses, or other features that initiate or sustain combustion. Such uses are determined by the Local Jurisdiction and may include, but are not limited to, power-generation and distribution facilities; wood processing or storage sites; flammable gas or liquids processing or storage sites; or shooting ranges.
(s) Local Jurisdiction: Any county, city/county agency or department, or any locally authorized district that approves or has the authority to regulate Development.
(t) Municipal-Type Water System: A system having water pipes servicing Fire Hydrants and designed to furnish, over and above domestic consumption, a minimum of 250 gpm (950 L/min) at 20 psi (138 kPa) residual pressure for a two (2) hour duration.
(u) Occupancy: The purpose for which a Building, or part thereof, is used or intended to be used.
(v) One-way Road: A Road that provides a minimum of one Traffic Lane width designed for traffic flow in one direction only.
(w) Residential Unit: Any Building or portion thereof which contains living facilities including provisions for sleeping, eating, cooking and/or sanitation, for one or more persons. Manufactured homes, mobile homes, and factory-built housing are considered Residential Units.
(x) Ridgeline: The line of intersection of two opposing slope aspects running parallel to the long axis of the highest elevation of land; or an area of higher ground separating two adjacent streams or watersheds.
(y) Road: A public or private vehicular pathway to more than four (4) Residential Units, or to any industrial or commercial Occupancy.
(z) Road or Driveway Structures: Bridges, culverts, and other appurtenant Structures which supplement the Traffic Lane or Shoulders.
(aa) Same Practical Effect: As used in this subchapter, means an Exception or alternative with the capability of applying accepted wildland fire suppression strategies and tactics, and provisions for fire fighter safety, including:

(1) access for emergency wildland fire equipment,
(2) safe civilian evacuation,
(3) signing that avoids delays in emergency equipment response,
(4) available and accessible water to effectively attack Wildfire or defend a Structure from Wildfire, and
(5) fuel modification sufficient for civilian and fire fighter safety.

(bb) Shoulder: A vehicular pathway adjacent to the Traffic Lane.
(cc) State Responsibility Area (SRA): As defined in Public Resources Code sections 4126-4127; and the California Code of Regulations, title 14, division 1.5, chapter 7, article 1, sections 1220-1220.5.
(dd) Strategic Ridgeline: a Ridgeline identified pursuant to § 1276.02(a) that may support fire suppression activities or where the preservation of the Ridgeline as an Undeveloped Ridgeline would reduce fire risk and improve fire protection.
(ee) Structure: That which is built or constructed or any piece of work artificially built up or composed of parts joined together in some definite manner.
(ff) Traffic Lane: The portion of a Road or Driveway that provides a single line of vehicle travel.
(gg) Turnaround: An area which allows for a safe opposite change of direction for Fire Apparatus at the end of a Road or Driveway.
(hh) Turnout: A widening in a Road or Driveway to allow vehicles to pass.

(ii) Undeveloped Ridgeline: A Ridgeline with no Buildings.
(jj) Utility and Miscellaneous Group U: A Structure of an accessory character or a miscellaneous Structure not classified in any specific Occupancy permitted, constructed, equipped, and maintained to conform to the requirements of Title 24, California Building Standards Code.
(kk) Vertical Clearance: The minimum specified height of a bridge, overhead projection, or vegetation clearance above the Road or Driveway.
(ll) Vertical Curve: A curve at a high or low point of a Road that provides a gradual transition between two Road grades or slopes.
(mm) Very High Fire Hazard Severity Zone (VHFHSZ): As defined in Government Code section 51177(i).
(nn) Wildfire: Has the same meaning as "forest fire" in Public Resources Code Section 4103.

§ 1270.02. Purpose

(a) Subchapter 2 has been prepared and adopted for the purpose of establishing state minimum Wildfire protection standards in conjunction with Building, construction, and Development in the State Responsibility Area (SRA) and, after July 1, 2021, the Very High Fire Hazard Severity Zones, as defined in Government Code § 51177(i) (VHFHSZ).
(b) The future design and construction of Structures, subdivisions and Developments in the SRA and, after July 1, 2021, the VHFHSZ shall provide for basic emergency access and perimeter Wildfire protection measures as specified in the following articles.
(c) These standards shall provide for emergency access; signing and Building numbering; private water supply reserves for emergency fire use; vegetation modification, Fuel Breaks, Greenbelts, and measures to preserve Undeveloped Ridgelines. Subchapter 2 specifies the minimums for such measures.

§ 1270.03. Scope

(a) Subchapter 2 shall apply to:

(1) the perimeters and access to all residential, commercial, and industrial Building construction within the SRA approved after January 1, 1991, and those approved after July 1, 2021 within the VHFHSZ, except as set forth below in subsection (b).

(2) the siting of newly installed commercial modulars, manufactured homes, mobilehomes, and factory-built housing, as defined in Health and Safety Code sections 18001.8, 18007, 18008, and 19971;

(3) all tentative and parcel maps or other Developments approved after January 1, 1991; and

(4) applications for Building permits on a parcel approved in a pre-1991 parcel or tentative map to the extent that conditions relating to the perimeters and access to the Buildings were not imposed as part of the approval of the parcel or tentative map.

(b) Subchapter 2 does not apply where an application for a Building permit is filed after January 1, 1991 for Building construction on a parcel that was formed from a parcel map or tentative map (if the final map for the tentative map is approved within the time prescribed by the local ordinance) approved prior to January 1, 1991, to the extent that conditions relating to the perimeters and access to the Buildings were imposed by the parcel map or final tentative map approved prior to January 1, 1991.
(c) Affected activities include, but are not limited to:

(1) permitting or approval of new parcels, excluding lot line adjustments as specified in Government Code (GC) section 66412(d);

(2) application for a Building permit for new construction not relating to an existing Structure;

(3) application for a use permit;

(4) Road construction including construction of a Road that does not currently exist, or extension of an existing Road.

(d) The standards in Subchapter 2 applicable to Roads shall not apply to Roads used solely for Agriculture; mining; or the management of timberland or harvesting of forest products.

§ 1270.04. Provisions for Application of these Regulations

This Subchapter shall be applied as follows:

(a) the Local Jurisdictions shall provide the Director of the California Department of Forestry and Fire Protection (CAL FIRE) or their designee with notice of applications for Building permits, tentative parcel maps, tentative maps, and installation or use permits for construction or Development within the SRA, or if after July, 1 2021, the VHFHSZ.

(b) the Director or their designee may review and make fire protection recommendations on applicable construction or development permits or maps provided by the Local Jurisdiction.

(c) the Local Jurisdiction shall ensure that the applicable sections of this Subchapter become a condition of approval of any applicable construction or Development permit or map.

§ 1270.05. Local Regulations

(a) Subchapter 2 shall serve as the minimum Wildfire protection standards applied in SRA and VHFHSZ. However, Subchapter 2 does not supersede local regulations which equal or exceed the standards of this Subchapter.

(b) A local regulation equals or exceeds a minimum standard of this Subchapter only if, at a minimum, the local regulation also fully complies with the corresponding minimum standard in this Subchapter.

(c) A Local Jurisdiction shall not apply exemptions to Subchapter 2 that are not enumerated in Subchapter 2. Exceptions requested and approved in conformance with § 1270.07 (Exceptions to Standards) may be granted on a case-by-case basis.

(d) Notwithstanding a local regulation that equals or exceeds the State Minimum Fire Safe Regulations, Building construction shall comply with the State Minimum Fire Safe Regulations.

§ 1270.06. Inspections

Inspections shall conform to the following requirements:

(a) Inspections in the SRA shall be made by:

(1) the Director, or

(2) Local Jurisdictions that have assumed state fire protection responsibility on SRA lands, or

(3) Local Jurisdictions where the inspection duties have been formally delegated by the Director to the Local Jurisdictions, pursuant to subsection (b).

(b) The Director may delegate inspection authority to a Local Jurisdiction subject to all of the following criteria:

(1) The Local Jurisdiction represents that they have appropriate resources to perform the delegated inspection authority.

(2) The Local Jurisdiction acknowledges that CAL FIRE's authority under subsection (d) shall not be waived or restricted.

(3) The Local Jurisdiction consents to the delegation of inspection authority.

(4) The Director may revoke the delegation at any time.

(5) The delegation of inspection authority, and any subsequent revocation of the delegation, shall be documented in writing, and retained on file at the CAL FIRE Unit headquarters that administers SRA fire protection in the area.

(c) Inspections in the VHFHSZ shall be made by the Local Jurisdiction.

(d) Nothing in this section abrogates CAL FIRE's authority to inspect and enforce state forest and fire laws in the SRA even when the inspection duties have been delegated pursuant to this section.
(e) Reports of violations within the SRA shall be provided to the CAL FIRE Unit headquarters that administers SRA fire protection in the Local Jurisdiction.
(f) When inspections are conducted, they shall occur prior to: the issuance of the use permit or certificate of Occupancy; the recordation of the parcel map or final map; the filing of a notice of completion; or the final inspection of any project or Building permit.

§ 1270.07. Exceptions to Standards

(a) Upon request by the applicant, an Exception to standards within this Subchapter may be allowed by the Inspection entity in accordance with 14 CCR § 1270.06 (Inspections) where the Exceptions provide the Same Practical Effect as these regulations towards providing Defensible Space. Exceptions granted by the Local Jurisdiction listed in 14 CCR § 1270.06, shall be made on a case-by-case basis only. Exceptions granted by the Local Jurisdiction listed in 14 CCR § 1270.06 shall be forwarded to the appropriate CAL FIRE unit headquarters that administers SRA fire protection in that Local Jurisdiction, or the county in which the Local Jurisdiction is located and shall be retained on file at the Unit Office.
(b) Requests for an Exception shall be made in writing to the Local Jurisdiction listed in 14 CCR § 1270.06 by the applicant or the applicant's authorized representative.
At a minimum, the request shall state the specific section(s) for which an Exception is requested; material facts supporting the contention of the applicant; the details of the Exception proposed; and a map showing the proposed location and siting of the Exception. Local Jurisdictions listed in § 1270.06 (Inspections) may establish additional procedures or requirements for Exception requests.
(c) Where an Exception is not granted by the inspection entity, the applicant may appeal such denial to the Local Jurisdiction. The Local Jurisdiction may establish or utilize an appeal process consistent with existing local building or planning department appeal processes.
(d) Before the Local Jurisdiction makes a determination on an appeal, the inspector shall be consulted and shall provide to that Local Jurisdiction documentation outlining the effects of the requested Exception on Wildfire protection.
(e) If an appeal is granted, the Local Jurisdiction shall make findings that the decision meets the intent of providing Defensible Space consistent with these regulations. Such findings shall include a statement of reasons for the decision. A written copy of these findings shall be provided to the CAL FIRE Unit headquarters that administers SRA fire protection in that Local Jurisdiction.

§ 1270.08. Distance Measurements

All specified or referenced distances are measured along the ground, unless otherwise stated.

Article 2 Ingress and Egress

§ 1273.00. Intent

Roads, and Driveways, whether public or private, unless exempted under 14 CCR § 1270.03(d), shall provide for safe access for emergency Wildfire equipment and civilian evacuation concurrently, and shall provide unobstructed traffic circulation during a Wildfire emergency consistent with 14 CCR §§ 1273.00 through 1273.09.

§ 1273.01. Width.

(a) All roads shall be constructed to provide a minimum of two ten (10) foot traffic lanes, not including shoulder and striping. These traffic lanes shall provide for two-way traffic flow to support emergency vehicle and civilian egress, unless other standards are provided in this article or additional requirements are mandated by Local Jurisdictions or local subdivision requirements. Vertical clearances shall conform to the requirements in California Vehicle Code section 35250.

(b) All One-way Roads shall be constructed to provide a minimum of one twelve (12) foot traffic lane, not including Shoulders. The Local Jurisdiction may approve One-way Roads.

(1) All one-way roads shall, at both ends, connect to a road with two traffic lanes providing for travel in different directions, and shall provide access to an area currently zoned for no more than ten (10) Residential Units.

(2) In no case shall a One-way Road exceed 2,640 feet in length. A turnout shall be placed and constructed at approximately the midpoint of each One-way Road.

(c) All driveways shall be constructed to provide a minimum of one (1) ten (10) foot traffic lane, fourteen (14) feet unobstructed horizontal clearance, and unobstructed vertical clearance of thirteen feet, six inches (13′ 6″).

§ 1273.02. Road Surface

(a) Roads shall be designed and maintained to support the imposed load of Fire Apparatus weighing at least 75,000 pounds, and provide an aggregate base.

(b) Road and Driveway Structures shall be designed and maintained to support at least 40,000 pounds.

(c) Project proponent shall provide engineering specifications to support design, if requested by the Local Jurisdiction.

§ 1273.03. Grades

(a) At no point shall the grade for all Roads and Driveways exceed 16 percent.

(b) The grade may exceed 16%, not to exceed 20%, with approval from the Local Jurisdiction and with mitigations to provide for Same Practical Effect.

§ 1273.04. Radius

(a) No Road or Road Structure shall have a horizontal inside radius of curvature of less than fifty (50) feet. An additional surface width of four (4) feet shall be added to curves of 50-100 feet radius; two (2) feet to those from 100-200 feet.

(b) The length of vertical curves in Roadways, exclusive of gutters, ditches, and drainage structures designed to hold or divert water, shall be not less than one hundred (100) feet.

§ 1273.05. Turnarounds

(a) Turnarounds are required on Driveways and Dead-end Roads.

(b) The minimum turning radius for a turnaround shall be forty (40) feet, not including parking, in accordance with the figures in 14 CCR §§ 1273.05(e) and 1273.05(f). If a hammerhead/T is used instead, the top of the "T" shall be a minimum of sixty (60) feet in length.
(c) Driveways exceeding 150 feet in length, but less than 800 feet in length, shall provide a turnout near the midpoint of the Driveway. Where the driveway exceeds 800 feet, turnouts shall be provided no more than 400 feet apart.
(d) A turnaround shall be provided on Driveways over 300 feet in length and shall be within fifty (50) feet of the building.
(d) Each Dead-end Road shall have a turnaround constructed at its terminus. Where parcels are zoned five (5) acres or larger, turnarounds shall be provided at a maximum of 1,320 foot intervals.
(e) Figure A. Turnarounds on roads with two ten-foot traffic lanes.
Figure A/Image 1 on the left is a visual representation of paragraph (b).
(f) Figure B. Turnarounds on driveways with one ten-foot traffic lane.
Figure B/Image 2 on the right is a visual representation of paragraph (b).

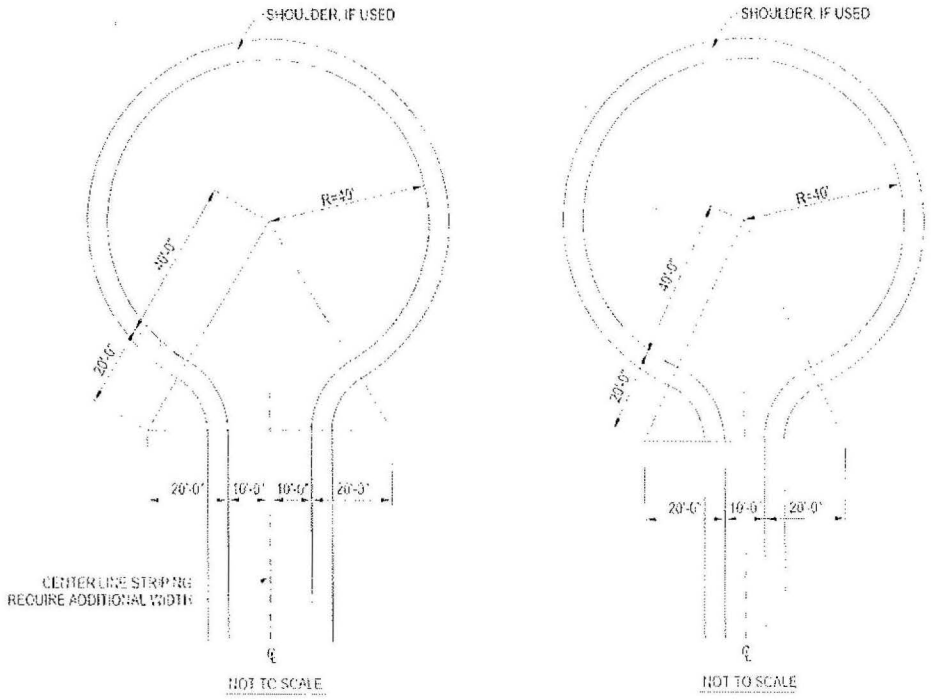


FIGURE FOR 14 CCR § 1273.05. TURNAROUND EXAMPLES

§ 1273.06. Turnouts

Turnouts shall be a minimum of twelve (12) feet wide and thirty (30) feet long with a minimum twenty-five (25) foot taper on each end.

§ 1273.07. Road and Driveway Structures

(a) Appropriate signing, including but not limited to weight or vertical clearance limitations, One-way Road or single traffic lane conditions, shall reflect the capability of each bridge.
(b) Where a bridge or an elevated surface is part of a Fire Apparatus access road, the bridge shall be constructed and maintained in accordance with the American Association of State and

Highway Transportation Officials Standard Specifications for Highway Bridges, 17th Edition, published 2002 (known as AASHTO HB-17), hereby incorporated by reference. Bridges and elevated surfaces shall be designed for a live load sufficient to carry the imposed loads of fire apparatus. Vehicle load limits shall be posted at both entrances to bridges when required by the local authority having jurisdiction.
(c) Where elevated surfaces designed for emergency vehicle use are adjacent to surfaces which are not designed for such use, barriers, or signs, or both, as approved by the local authority having jurisdiction, shall be installed and maintained.
(d) A bridge with only one traffic lane may be authorized by the Local Jurisdiction; however, it shall provide for unobstructed visibility from one end to the other and turnouts at both ends.

§ 1273.08. Dead-end Roads

(a) The maximum length of a Dead-end Road, including all Dead-end Roads accessed from that Dead-end Road, shall not exceed the following cumulative lengths, regardless of the number of parcels served:

parcels zoned for less than one acre - 800 feet
parcels zoned for 1 acre to 4.99 acres - 1,320 feet
parcels zoned for 5 acres to 19.99 acres - 2,640 feet
parcels zoned for 20 acres or larger - 5,280 feet

All lengths shall be measured from the edge of the Road surface at the intersection that begins the Road to the end of the Road surface at its farthest point. Where a dead-end road crosses areas of differing zoned parcel sizes requiring different length limits, the shortest allowable length shall apply.
(b) See 14 CCR § 1273.05 for dead-end road turnaround requirements.

§ 1273.09. Gate Entrances

(a) Gate entrances shall be at least two (2) feet wider than the width of the traffic lane(s) serving that gate and a minimum width of fourteen (14) feet unobstructed horizontal clearance and unobstructed vertical clearance of thirteen feet, six inches (13' 6").
(b) All gates providing access from a Road to a Driveway shall be located at least thirty (30) feet from the roadway and shall open to allow a vehicle to stop without obstructing traffic on that Road.
(c) Where a One-way Road with a single traffic lane provides access to a gated entrance, a forty (40) foot turning radius shall be used.
(d) Security gates shall not be installed without approval. Where security gates are installed, they shall have an approved means of emergency operation. Approval shall be by the local authority having jurisdiction. The security gates and the emergency operation shall be maintained operational at all times.

Article 3 Signing and Building Numbering

§ 1274.00. Intent

To facilitate locating a fire and to avoid delays in response, all newly constructed or approved Roads and Buildings shall be designated by names or numbers posted on signs clearly visible and legible from the Road. This section shall not restrict the size of letters or numbers appearing on road signs for other purposes.

§ 1274.01. Road Signs.

(a) Newly constructed or approved Roads must be identified by a name or number through a consistent system that provides for sequenced or patterned numbering and/or non-duplicative naming within each Local Jurisdiction. This section does not require any entity to rename or renumber existing roads, nor shall a Road providing access only to a single commercial or industrial Occupancy require naming or numbering.
(b) The size of letters, numbers, and symbols for Road signs shall be a minimum four (4) inch letter height, half inch (.5) inch stroke, reflectorized, contrasting with the background color of the sign.

§ 1274.02. Road Sign Installation, Location, and Visibility.

(a) Road signs shall be visible and legible from both directions of vehicle travel for a distance of at least one hundred (100) feet.
(b) Signs required by this article identifying intersecting Roads shall be placed at the intersection of those Roads.
(c) A sign identifying traffic access or flow limitations, including but not limited to weight or vertical clearance limitations, dead-end roads, one-way roads, or single lane conditions, shall be placed:

(1) at the intersection preceding the traffic access limitation, and
(2) no more than one hundred (100) feet before such traffic access limitation.

(d) Road signs required by this article shall be posted at the beginning of construction and shall be maintained thereafter.

§ 1274.03. Addresses for Buildings.

(a) All Buildings shall be issued an address by the Local Jurisdiction which conforms to that jurisdiction's overall address system. Utility and miscellaneous Group U Buildings are not required to have a separate address; however, each Residential Unit within a Building shall be separately identified.
(b) The size of letters, numbers, and symbols for addresses shall conform to the standards in the California Fire Code, California Code of Regulations title 24, part 9.
(c) Addresses for residential Buildings shall be reflectorized.

§ 1274.04. Address Installation, Location, and Visibility.

(a) All buildings shall have a permanently posted address which shall be plainly legible and visible from the Road fronting the property.
(b) Where access is by means of a private Road and the address identification cannot be viewed from the public way, an unobstructed sign or other means shall be used so that the address is visible from the public way.
(c) Address signs along one-way Roads shall be visible from both directions.
(d) Where multiple addresses are required at a single driveway, they shall be mounted on a single sign or post.

(e) Where a Road provides access solely to a single commercial or industrial business, the address sign shall be placed at the nearest Road intersection providing access to that site, or otherwise posted to provide for unobstructed visibility from that intersection.
(f) In all cases, the address shall be posted at the beginning of construction and shall be maintained thereafter.

Article 4 Emergency Water Standards

§ 1275.00. Intent

Emergency water for Wildfire protection shall be available, accessible, and maintained in quantities and locations specified in the statute and these regulations in order to attack a Wildfire or defend property from a Wildfire.

§ 1275.01. Application

The provisions of this article shall apply in the tentative and parcel map process when new parcels are approved by the Local Jurisdiction.

§ 1275.02. Water Supply.

(a) When a water supply for structure defense is required to be installed, such protection shall be installed and made serviceable prior to and during the time of construction except when alternative methods of protection are provided and approved by the Local Jurisdiction.
(b) Water systems equaling or exceeding the California Fire Code, California Code of Regulations title 24, part 9, or, where a municipal-type water supply is unavailable, National Fire Protection Association (NFPA) 1142, "Standard on Water Supplies for Suburban and Rural Fire Fighting," 2017 Edition, hereby incorporated by reference, shall be accepted as meeting the requirements of this article.
(c) Such emergency water may be provided in a fire agency mobile water tender, or naturally occurring or man made containment structure, as long as the specified quantity is immediately available.
(d) Nothing in this article prohibits the combined storage of emergency Wildfire and structural firefighting water supplies unless so prohibited by local ordinance or specified by the local fire agency.
(e) Where freeze or crash protection is required by Local Jurisdictions, such protection measures shall be provided.

§ 1275.03. Hydrants and Fire Valves.

(a) The hydrant or fire valve shall be eighteen (18) inches above the finished surface. Its location in relation to the road or driveway and to the building(s) or structure(s) it serves shall comply with California Fire Code, California Code of Regulations title 24, part 9, Chapter 5, and Appendix C.
(b) The hydrant head shall be a two and half (2 1/2) inch National Hose male thread with cap for pressure and gravity flow systems and four and a half (4 1/2) inch for draft systems.
(c) Hydrants shall be wet or dry barrel and have suitable freeze or crash protection as required by the local jurisdiction.

§ 1275.04. Signing of Water Sources.

(a) Each hydrant, fire valve, or access to water shall be identified as follows:
    (1) if located along a driveway, a reflectorized blue marker, with a minimum dimension of three (3) inches shall be located on the driveway address sign and mounted on a fire retardant post, or
    (2) if located along a road,

(i) a reflectorized blue marker, with a minimum dimension of three (3) inches, shall be mounted on a fire retardant post. The sign post shall be within three (3) feet of said hydrant or fire valve, with the sign no less than three (3) feet nor greater than five (5) feet above ground, in a horizontal position and visible from the driveway, or

(ii) as specified in the State Fire Marshal's Guidelines for Fire Hydrant Markings Along State Highways and Freeways, May 1988.

§ 1275.04. Signing of Water Sources.

(a) Each Fire Hydrant or access to water shall be identified as follows:

(1) if located along a Driveway, a reflectorized blue marker, with a minimum dimension of three (3) inches shall be located on the Driveway address sign and mounted on a fire retardant post, or

(2) if located along a Road,

(i) a reflectorized blue marker, with a minimum dimension of three (3) inches, shall be mounted on a fire retardant post. The sign post shall be within three (3) feet of said Fire Hydrant with the sign no less than three (3) feet nor greater than five (5) feet above ground, in a horizontal position and visible from the Driveway, or

(ii) as specified in the State Fire Marshal's Guidelines for Fire Hydrant Markings Along State Highways and Freeways, May 1988.

Article 5 Building Siting, Setbacks, and Fuel Modification

§ 1276.00 Intent

To reduce the intensity of a Wildfire, reducing the volume and density of flammable vegetation around Development through strategic fuel modification, parcel siting and Building setbacks, and the protection of Undeveloped Ridgelines shall provide for increased safety for emergency fire equipment, including evacuating civilians, and a point of attack or defense from a Wildfire.

§ 1276.01. Building and Parcel Siting and Setbacks

(a) All parcels shall provide a minimum thirty (30) foot setback for all Buildings from all property lines and/or the center of a Road, except as provided for in subsection (b).

(b) A reduction in the minimum setback shall be based upon practical reasons, which may include but are not limited to, parcel dimensions or size, topographic limitations, Development density requirements or other Development patterns that promote low-carbon emission outcomes; sensitive habitat; or other site constraints , and shall provide for an alternative method to reduce Structure-to-Structure ignition by incorporating features such as, but not limited to:

(1) non-combustible block walls or fences; or

(2) non-combustible material extending five (5) feet horizontally from the furthest extent of the Building; or

(3) hardscape landscaping; or

(4) a reduction of exposed windows on the side of the Structure with a less than thirty (30) foot setback; or

(5) the most protective requirements in the California Building Code, California Code of Regulations Title 24, Part 2, Chapter 7A, as required by the Local Jurisdiction.

§ 1276.02. Ridgelines

(a) The Local Jurisdiction shall identify Strategic Ridgelines, if any, to reduce fire risk and improve fire protection through an assessment of the following factors:

(1) Topography;

(2) Vegetation;

(3) Proximity to any existing or proposed residential, commercial, or industrial land uses;

(4) Construction where mass grading may significantly alter the topography resulting in the elimination of Ridgeline fire risks;

(5) Ability to support effective fire suppression; and

(6) Other factors, if any, deemed relevant by the Local Jurisdiction.

(b) Preservation of Undeveloped Ridgelines identified as strategically important shall be required pursuant to this section.

(c) New Buildings on Undeveloped Ridgelines identified as strategically important are prohibited, as described in subsections (c)(1), (c)(2), and (c)(3).

(1) New Residential Units are prohibited within or at the top of drainages or other topographic features common to Ridgelines that act as chimneys to funnel convective heat from Wildfires.

(2) Nothing in this subsection shall be construed to alter the extent to which utility infrastructure, including but not limited to wireless telecommunications facilities, as defined in Government Code section 65850.6, subdivision (d)(2), or Storage Group S or Utility and Miscellaneous Group U Structures, may be constructed on Undeveloped Ridgelines.

(3) Local Jurisdictions may approve Buildings on Strategic Ridgelines where Development activities such as mass grading will significantly alter the topography that results in the elimination of Ridgeline fire risks.

(d) The Local Jurisdiction may implement further specific requirements to preserve Undeveloped Ridgelines.

§ 1276.03. Fuel Breaks

(a) When Building construction meets the following criteria, the Local Jurisdiction shall determine the need and location for Fuel Breaks in consultation with the Fire Authority:

(1) the permitting or approval of three (3) or more new parcels, excluding lot line adjustments as specified in Government Code (GC) section 66412(d); or

(2) an application for a change of zoning increasing zoning intensity or density; or

(3) an application for a change in use permit increasing use intensity or density.

(b) Fuel Breaks required by the Local Jurisdiction, in consultation with the Fire Authority, shall be located, designed, and maintained in a condition that reduces the potential of damaging radiant and convective heat or ember exposure to Access routes, Buildings, or infrastructure within the Development.

(c) Fuel Breaks shall have, at a minimum, one point of entry for fire fighters and any Fire Apparatus. The specific number of entry points and entry requirements shall be determined by the Local Jurisdiction, in consultation with the Fire Authority.

(d) Fuel Breaks may be required at locations such as, but not limited to:

(1) Directly adjacent to defensible space as defined by 14 CCR § 1299.02 to reduce radiant and convective heat exposure, ember impacts, or support fire suppression tactics;

(2) Directly adjacent to Roads to manage radiant and convective heat exposure or ember impacts, increase evacuation safety, or support fire suppression tactics;

(3) Directly adjacent to a Hazardous Land Use to limit the spread of fire from such uses, reduce radiant and convective heat exposure, or support fire suppression tactics;

(4) Strategically located along Ridgelines, in Greenbelts, or other locations to reduce radiant and convective heat exposure, ember impacts, or support community level fire suppression tactics.

(e) Fuel Breaks shall be completed prior to the commencement of any permitted construction.

(f) Fuel Breaks shall be constructed using the most ecologically and site appropriate treatment option, such as, but not limited to, prescribed burning, manual treatment, mechanical treatment, prescribed herbivory, and targeted ground application of herbicides.

(g) Where a Local Jurisdiction requires Fuel Breaks, maintenance mechanisms shall be established to ensure the fire behavior objectives and thresholds are maintained over time.

(h) The mechanisms required shall be binding upon the property for which the Fuel Break is established, shall ensure adequate maintenance levels, and may include written legal agreements; permanent fees, taxes, or assessments; assessments through a homeowners' association; or other funding mechanisms.

§ 1276.04 Greenbelts, Greenways, Open Spaces and Parks

(a) Where a Greenbelt, Greenway, open space, park, landscaped or natural area, or portions thereof, is intended to serve as a Fuel Break, the space or relevant portion thereof shall conform with the requirements in § 1276.03 (Fuel Breaks).

§ 1276.05 Disposal of Flammable Vegetation and Fuels

The disposal, including burning or removal to a site approved by the Local Jurisdiction, in consultation with the Fire Authority, of flammable vegetation and fuels caused by site construction, Road, and Driveway construction shall be in accordance with all applicable laws and regulations.

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Date of Hearing: April 25, 2018

ASSEMBLY COMMITTEE ON LOCAL GOVERNMENT
Cecilia Aguiar-Curry, Chair
AB 2911 (Friedman) – As Amended April 18, 2018

SUBJECT: Fire safety.

SUMMARY: Makes various changes to fire safety planning efforts, defensible space requirements, and electrical transmission or distribution lines' vegetation clearance requirements with the intent to improve the fire safety of California communities. Specifically, **this bill**:

1) Requires, no later than January 31, 2020, the State Fire Marshal (SFM), in consultation with Department of Forestry and Fire Protection (CAL FIRE) and the Director of the Housing and Community Development Department (HCD) to recommend building standards that provide for comprehensive site and structure fire risk reduction to protect structures from fire risk.

2) Requires, no later than January 31, 2020, the SFM, in consultation with CAL FIRE and HCD, to develop a list of low-cost retrofits that provide for comprehensive site and structure fire risk reduction to protect structures from fire risk. Requires CAL FIRE to incorporate the list in its fire prevention education and outreach efforts.

3) Requires the list to include instructions on how to replace highly flammable plants with native plant species that are fire retardant, fire resistant, drought tolerant, or any combination thereof.

4) Requires a county that contains State Responsibility Areas (SRA) and cities that contain a Very High Fire Hazard Severity Zone (Zone) to submit for review the safety element of its general plan to the State Board of Forestry and Fire Protection (Board) and every local agency that provides fire protection to territory in the city or county on July 1, 2020, and every five years thereafter.

5) Authorizes the Board, within 15 days of receipt of notification that its fire prevention recommendations will not be accepted by the local government, to request a consultation, prior to approval of the draft element or amendment, conducted in person, electronically, or by phone. Prohibits the board of supervisors or city council from approving the draft element or draft amendment until after consulting with the Board. Requires the consultation to occur no later than 30 days after the Board's request.

6) Requires on or before July 1, 2021, and every five years thereafter, the Board, in consultation with the SFM, to survey local governments, including counties, cities and fire districts to identify existing subdivisions in the SRA or a Zone without a secondary egress route that are at significant fire risk.

7) Requires the Board, in consultation with the SFM, and specified local government to develop recommendations to improve the subdivision's fire safety. Authorizes the recommendations to include, but not be limited to, the following:

    a) Creating secondary access to the subdivision;

b) Improvement to existing access road; and,

c) Other additional fire safety measures.

8) Requires the Board to provide the final recommendations developed to the subdivision and applicable local government. Allows the Board to enter into contracts with an independent group to conduct the survey. Requires the Board to maintain a list of the subdivisions and the status of the implementation of the recommendations.

9) Authorizes CAL FIRE to permit an owner of a property to construct a fire break for a radius of up to 300 feet from a structure or to the property line, whichever distance is shorter, if the Director of CAL FIRE determines it is necessary to protect life, property, and natural resources from unreasonable risks associated with wildfire.

10) Updates provisions of law related to the clearance required for electrical transmission or distribution lines.

11) Requires dead, rotten, or diseased trees, or dead, rotten, or diseased portions of otherwise healthy trees that overhang or lean towards and may fall into a line to be felled or pruned so as to remove the hazard. Requires vertical clearance of vegetation directly above conductors to be evaluated, as specified.

12) Allows any person that owns, controls, operates, or maintains any electrical transmission or distribution line to traverse land as necessary, regardless of land ownership, to prune trees to maintain clearances, as specified, and to abate, by pruning or removal, any hazardous dead, rotten, diseased, or structurally defective live trees. Provides that the clearances obtained at time-of-trim shall be at the full discretion of the person that owns, controls, operates or maintains any electrical transmission or distribution.

13) Specifies that reimbursement to local agencies and school districts for those costs shall be made, pursuant to Part 7 (commencing with Section 17500) of Division 4 of Title 2 of the Government Code, if the Commission on State Mandates determines that this act contains costs mandated by the state.

14) Makes a number of findings and declarations.

EXISTING LAW:

1) Requires, no later than January 1, 2005, the SFM, in consultation with the Director of CAL FIRE and the HCD to recommend building standards that provide for comprehensive site and structure fire risk reduction to protect structures from fire risk.

2) Requires the Board to classify all lands within the state for the purpose of determining areas in which the financial responsibility of preventing and suppressing fires is primarily the responsibility of the state [known as the SRA].

3) Requires CAL FIRE to identify certain areas outside the SRA as Zones based on consistent statewide criteria and based on the severity of fire hazard that is expected to prevail in those areas.

4) Requires a draft element of or draft amendment to the safety element of a county or a city's general plan to be submitted to the Board and to every local agency that provides fire protection to territory in the city or county at least 90 days prior to either the adoption of the safety element or amendment to the safety element of its general plan for each county that contains SRA or a Zone.

5) Requires the Board to review the draft or existing safety element and recommend changes regarding both of the following:

   a) Land use policy in SRA and Zones that will protect life, property and natural resources from unreasonable fire risk; and,

   b) Methods and strategies for wildfire risk reduction and prevention.

6) Requires local governments to consider recommendations made by the Board and communicate to the Board its reasons for not accepting the recommendations.

7) Requires the Board to adopt regulations implementing minimum fire safety standards related to defensible space in the SRA, which apply to buildings, parcel maps, and other developments constructed or approved on or after January 1, 1991. Requires regulations to include all of the following:

   a) Road standards for fire equipment access;

   b) Standards for signs identifying streets, roads, and buildings;

   c) Minimum private water supply reserves for emergency fire use; and,

   d) Fuel breaks and greenbelts.

8) Requires a person who owns, leases, controls, operates, or maintains a building or structure on land that is covered with flammable material to maintain defensible space of 100 feet around the structure.

9) Requires CAL FIRE to develop and update a guidance document on fuels management that includes regionally appropriate vegetation management suggestions that preserve and restore native species, minimize erosion, minimize water consumption, and permit trees near homes for shade, aesthetics, and habitat. Requires the guidelines to include suggestions to minimize or eliminate the risk of flammability of non-vegetative sources of combustion, such as woodpiles, propane tanks, decks, and outdoor lawn furniture.

10) Authorizes a state or local fire official to permit an owner of a property, or his or her agent, to construct a firebreak, or implement appropriate vegetation management techniques, to ensure that defensible space is adequate for the protection of a hospital, adult residential care facility, or similar facility on the property. Authorizes the firebreak to be for a radius of up to 300 feet from the facility, or to the property line, whichever distance is shorter.

11) Requires any person that owns, controls, operates, or maintains any electrical transmission or distribution line upon any mountainous land, or in forest-covered land, brush-covered land,

or grass-covered land during such times and in such areas as are determined to be necessary by CAL FIRE to maintain a clearance in all directions between all vegetation and all conductors, as follows:

a) For any line which is operating at 2,400 or more volts, but less than 72,000 volts, four feet;

b) For any line which is operating at 72,000 or more volts, but less than 110,000 volts, six feet; and,

c) For any line which is operating at 110,000 or more volts, 10 feet.

12) Requires dead trees, old decadent or rotten trees, trees weakened by decay or disease and trees or portions thereof that are leaning toward the line which may contact the line from the side or may fall on the line to be felled, cut, or trimmed to remove the hazard.

13) Authorizes CAL FIRE to permit exceptions to vegetation clearance requirements for persons that own, control, operate, or maintain any electrical transmission or distribution line based upon the specific circumstances involved.

FISCAL EFFECT: This bill is keyed fiscal and contains a state-mandated local program.

COMMENTS:

1) **Bill Summary.** This bill makes various changes to fire safety planning efforts, defensible space requirements, and electrical transmission or distribution lines' vegetation clearance requirements with the intent to improve the fire safety of California communities. This bill is sponsored by the author.

The provisions specific to local agencies include the following:

a) Requires a county that contains an SRA and cities that contain a Zone to submit for review the safety element of its general plan to the Board and every local agency that provides fire protection to territory in the city or county on July 1, 2020, and every five years thereafter.

b) Authorizes the Board, within 15 days of receipt of notification that its fire prevention recommendations will not be accepted by the local government, to request a consultation, prior to approval of the draft element or amendment, conducted in person, electronically, or by phone. Prohibits the board of supervisors or city council from approving the draft element or draft amendment until after consulting with the Board. Requires the consultation to occur no later than 30 days after the Board's request.

c) Requires on or before July 1, 2021, and every five years thereafter, the Board, in consultation with the SFM, to survey local governments, including counties, cities and fire districts to identify existing subdivisions in the SRA or a Zone without a secondary egress route that are at significant fire risk.

d) Requires the Board, in consultation with the SFM, and specified local governments, to develop recommendations to improve the subdivision's fire safety.

e) Requires the Board to provide the final recommendations developed to the subdivision and applicable local government. Allows the Board to enter into contracts with an independent group to conduct the survey. Requires the Board to maintain a list of the subdivisions and the status of the implementation of the recommendations.

2) **Author's Statement.** According to the author, "Given the devastation of the 2017 wildfire season, it is imperative that we reevaluate and update our current fire safety measures. Over 1 million acres were burned, tens of thousands of infrastructures were destroyed, hundreds were evacuated or displaced from their homes, and 46 individuals lost their lives. In the wake of such destructive fires, California has often enacted responsive measures to try and curtail the risks associated with future wildfires.

"In 1991, CAL-FIRE was required to designate very high fire hazard severity zones in urbanized areas. Currently, more than 40% of California is considered as a high fire risk severity zone. Landowners in these areas must follow specified fire prevention practices. Cities within these areas are also required to adopt a safety element in their general plans to reduce risk and prevent wildfires.

"In 2012, the California Legislature passed SB 1241 (Kehoe) which amended the safety element of the general plan each city is required to adopt to minimize fire risks through wise land use planning. SB 1241 required cities and counties found within high fire hazard severity zones to review and update their safety elements to address fire risks and the Board of Forestry (Board) to review those updates.

"AB 2911 improves the fire safety of communities in high fire risk severity zones by updating past fire safety legislation to better reflect the severe nature of what is now a year-round wildfire season."

3) **Arguments in Support.** None on file.

4) **Arguments in Opposition.** None on file.

5) **Double-referral.** This bill was heard in the Natural Resources Committee on April 16, 2018, and passed on a 7-0 vote.

REGISTERED SUPPORT / OPPOSITION:

Support

None on file

Opposition

None on file

Analysis Prepared by: Debbie Michel / L. GOV. / (916) 319-3958

AB-2911 Fire safety. (2017-2018)

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Date Published: 09/21/2018 09:00 PM

Assembly Bill No. 2911

CHAPTER 641

An act to amend Sections 51179, 51189, and 65302.5 of, and to add Section 65040.21 to, the Government Code, and to amend Sections 4291 and 4291.3 of, and to add Sections 4290.5 and 4295.5 to, the Public Resources Code, relating to fire safety.

[Approved by Governor September 21, 2018. Filed with Secretary of State September 21, 2018.]

LEGISLATIVE COUNSEL'S DIGEST

AB 2911, Friedman. Fire safety.

(1) Existing law requires a local agency to designate, by ordinance, very high fire hazard severity zones in its jurisdiction within 120 days of receiving recommendations from the Director of Forestry and Fire Protection and exempts a local agency, as defined, from that requirement if ordinances of the local agency, adopted on or before December 31, 1992, impose standards that are equivalent to, or more restrictive than, specified state standards. Existing law authorizes a local agency, at its discretion, to exclude from specified requirements governing fire risk reduction an area identified as a very high fire hazard severity zone by the director within the jurisdiction of the local agency, following a specified finding supported by substantial evidence that those requirements are not necessary for effective fire protection within the area.

This bill would eliminate the above-described exemption and exclusion and would require a local agency to transmit a copy of any ordinance adopted pursuant to these provisions to the State Board of Forestry and Fire Protection within 30 days of adoption. By imposing new responsibilities on local agencies with regard to the adoption of fire safety ordinances, the bill would impose a state-mandated local program.

(2) Existing law requires, no later than January 1, 2005, the State Fire Marshal, in consultation with the Director of Forestry and Fire Protection and the Director of Housing and Community Development, to recommend building standards that provide for comprehensive site and structure fire risk reduction to protect structures from fires spreading, as provided.

This bill would require the State Fire Marshal, no later than January 31, 2020, in consultation with the Director of Forestry and Fire Protection and the Director of Housing and Community Development, to recommend updated building standards that provide for comprehensive site and structure fire risk reduction to protect structures from fires spreading, as specified, based on lessons learned from the wildfires of 2017 and to develop a list of low-cost retrofits that provide for comprehensive site and structure fire risk reduction, as provided.

(3) Existing law requires each planning agency to prepare and the legislative body of each county and city to adopt a comprehensive, long-term general plan, including a safety element, for the physical development of the

county or city, as provided. Existing law requires the draft element of or draft amendment to the safety element of a county or city's general plan to be submitted to the State Board of Forestry and Fire Protection and to every local agency that provides fire protection to territory in the city or county at least 90 days prior to specified events.

Existing law requires a county that contains state responsibility areas and a city or county that contains a very high fire hazard severity zone to submit for review the safety element of its general plan to the board and every local agency that provides fire protection to territory in the city or county in accordance with a specified schedule based on location, as provided.

This bill would delete the latter submission requirement.

Existing law requires the State Board of Forestry and Fire Protection and authorizes a local agency to review and recommend changes to the safety element, as provided. Existing law requires the board of supervisors or the city council to consider the changes made by the board.

This bill would authorize the State Board of Forestry and Fire Protection to request a consultation with the board of supervisors or city council if the local agency decides not to adopt the board's recommendations, as provided. Because the bill would require local officials to consult with the board, this bill would impose a state-mandated local program.

(4) Existing law requires the Office of Planning and Research, when it adopts its next edition of the general plan guidelines, to include specified information related to fire hazards and fire safety.

This bill would require the office, by July 1, 2020, to update its guidance document entitled "Fire Hazard Planning, General Plan Technical Advice Series" in consultation with the Department of Forestry and Fire Protection, the state board, and other fire and safety experts, as provided.

(5) Existing law requires the State Board of Forestry and Fire Protection to adopt regulations implementing minimum fire safety standards related to defensible space applicable to state responsibility area lands, as provided.

This bill would require, on or before July 1, 2021, and every 5 years thereafter, the board, in consultation with the State Fire Marshal, to survey local governments and fire districts to identify existing subdivisions, as defined, in either a state responsibility area or a very high fire hazard severity zone, without secondary egress routes, that are at significant fire risk. The bill would require the board, in consultation with the State Fire Marshal and the local governments identified above, to develop recommendations to improve the subdivision's fire safety, as provided. The bill would require the board to provide final recommendations to the identified local governments.

(6) Existing law requires the Department of Forestry and Fire Protection to develop, periodically update, and post on its Internet Web site a guidance document on fuels management. Existing law requires the guidance to include, but not be limited to, regionally appropriate vegetation management suggestions that preserve and restore native species.

This bill would limit these native species, for purposes of the guidance document, to those that are fire resistant or drought tolerant, or both.

(7) Existing law authorizes a state or local fire official to authorize an owner of property or his or her agent to construct a firebreak, or implement appropriate vegetation management techniques, to ensure that defensible space is adequate for the protection of a hospital, adult residential care facility, school, aboveground storage tank, hazardous materials facility, or similar facility on the property.

This bill would authorize the director of the Department of Forestry and Fire Protection to authorize an owner of any other property not listed above to construct a firebreak, or implement appropriate vegetation management techniques, as provided, if it is determined by the director as necessary to protect life, property, and natural resources from unreasonable risks associated with wild land fires.

(8) Existing law requires a person that owns, controls, operates, or maintains an electrical transmission or distribution line upon mountainous land, or in forest-covered land, brush-covered land, or grass-covered land, to maintain certain clearances between all vegetation and all conductors that are carrying electric current during those times and in those areas determined to be necessary by the Director of Forestry and Fire Protection or the agency with primary responsibility for the fire protection of those areas.

Existing law requires dead trees, old decadent or rotten trees, trees weakened by decay or disease, and trees or portions of the trees that are leaning toward a line that may contact the line from the side or may fall on the line to be felled, cut, or trimmed so as to remove the hazard.

This bill would authorize any person who owns, controls, operates, or maintains any electrical transmission or distribution line to traverse land as necessary, regardless of land ownership or express permission to traverse land from the landowner, after providing notice and an opportunity to be heard to the landowner, to prune trees to maintain clearances, and to abate, by pruning or removal, any hazardous, dead, rotten, diseased, or structurally defective live trees. The bill would provide that these provisions do not exempt any person who owns, controls, operates, or maintains any electrical transmission or distribution line from liability for damages for the removal of vegetation that is not covered by any easement granted to him or her for the electrical transmission or distribution line.

(9) The California Constitution requires the state to reimburse local agencies and school districts for certain costs mandated by the state. Statutory provisions establish procedures for making that reimbursement.

This bill would provide that with regard to certain mandates no reimbursement is required by this act for a specified reason.

With regard to any other mandates, this bill would provide that, if the Commission on State Mandates determines that the bill contains costs so mandated by the state, reimbursement for those costs shall be made pursuant to the statutory provisions noted above.
Vote: majority Appropriation: no Fiscal Committee: yes Local Program: yes

THE PEOPLE OF THE STATE OF CALIFORNIA DO ENACT AS FOLLOWS:

SECTION 1. (a) The Legislature finds and declares all of the following:

(1) The 2017 fire season was devastating. Over 1.3 million acres burned in high-severity wildfires and over 10,000 structures were destroyed from wildfires across the state.

(2) Forty-four people died in the 2017 fire season, higher than the last 10 years combined.

(3) During 2017 and 2018 California experienced the largest fires ever recorded in its history.

(4) CAL FIRE and the State Board of Forestry and Fire Protection have recognized that California now often experiences a year-round fire season, with an increase in both the number and the intensity of large, damaging wildfires.

(5) The increase in frequency and intensity of large wildfires is due to a century of fire exclusion and the impacts of climate change.

(6) Governor Brown has declared these wildfire threats as the "new normal" in California.

(b) It is therefore the intent of the Legislature to strengthen requirements that improve defensible space protections, increase the use of fire-resistant building materials, and improve the fire safety of California communities.

(c) The Legislature intends that the Public Utilities Commission and the Department of Forestry and Fire Protection encourage the use of the concept "right tree right place" to reduce the need for utility vegetation management, reduce fire risk, and provide appropriate vegetation below energized electrical facilities that create carbon sequestration, air quality, and habitat benefits. "Right tree right place" is the selection of vegetation including trees, shrubs, or other plants that can grow under energized electrical facilities for their entire lives and would not come in contact with the line's conductors.

SEC. 2. Section 51179 of the Government Code is amended to read:

51179. (a) A local agency shall designate, by ordinance, very high fire hazard severity zones in its jurisdiction within 120 days of receiving recommendations from the director pursuant to subdivisions (b) and (c) of Section 51178.

(b) A local agency may, at its discretion, include areas within the jurisdiction of the local agency, not identified as very high fire hazard severity zones by the director, as very high fire hazard severity zones following a finding

supported by substantial evidence in the record that the requirements of Section 51182 are necessary for effective fire protection within the area.

(c) The local agency shall transmit a copy of an ordinance adopted pursuant to subdivision (a) to the State Board of Forestry and Fire Protection within 30 days of adoption.

(d) Changes made by a local agency to the recommendations made by the director shall be final and shall not be rebuttable by the director.

(e) The State Fire Marshal shall prepare and adopt a model ordinance that provides for the establishment of very high fire hazard severity zones.

(f) Any ordinance adopted by a local agency pursuant to this section that substantially conforms to the model ordinance of the State Fire Marshal shall be presumed to be in compliance with the requirements of this section.

(g) A local agency shall post a notice at the office of the county recorder, county assessor, and county planning agency identifying the location of the map provided by the director pursuant to Section 51178. If the agency amends the map, pursuant to subdivision (b) or (c) of this section, the notice shall instead identify the location of the amended map.

SEC. 3. Section 51189 of the Government Code is amended to read:

51189. (a) The Legislature finds and declares that site and structure defensibility is essential to reduce the risk of structure ignition as well as for effective fire suppression by firefighters. This need to establish defensibility extends beyond the site fuel management practices required by this chapter, and includes, but is not limited to, measures that increase the likelihood of a structure to withstand ignition, such as building design and construction requirements that use fire resistant building materials, and provide standards for reducing fire risks on structure projections, including, but not limited to, porches, decks, balconies and eaves, and structure openings, including, but not limited to, attic, foundation, and eave vents, doors, and windows.

(b) No later than January 31, 2020, the State Fire Marshal, in consultation with the Director of Forestry and Fire Protection and the Director of Housing and Community Development, shall, pursuant to Section 18930 of the Health and Safety Code, recommend updated building standards that provide for comprehensive site and structure fire risk reduction to protect structures from fires spreading from adjacent structures or vegetation and to protect vegetation from fires spreading from adjacent structures, based on information learned from the 2017 wildfire season.

(c) (1) No later than January 31, 2020, the State Fire Marshal, in consultation with the Director of Forestry and Fire Protection and the Director of Housing and Community Development, shall develop a list of low-cost retrofits that provide for comprehensive site and structure fire risk reduction to protect structures from fires spreading from adjacent structures or vegetation and to protect vegetation from fires spreading from adjacent structures. The department shall incorporate the list in its fire prevention education and outreach efforts.

(2) In addition to the requirements of paragraph (1), the list shall include a guidance document, including regionally appropriate vegetation management suggestions that preserve and restore native plant species that are fire resistant or drought tolerant, or both.

SEC. 4. Section 65040.21 is added to the Government Code, to read:

65040.21. By July 1, 2020, the office shall, in consultation with the Department of Forestry and Fire Protection, the State Board of Forestry and Fire Protection, and other fire and safety experts, update the guidance document entitled "Fire Hazard Planning, General Plan Technical Advice Series." The guidance document shall include specific land use strategies to reduce fire risk to buildings, infrastructure, and communities. The office shall, on and after July 1, 2020, update the guidance document not less than once every eight years.

SEC. 5. Section 65302.5 of the Government Code is amended to read:

65302.5. (a) At least 45 days prior to adoption or amendment of the safety element, each county and city shall submit to the California Geological Survey of the Department of Conservation one copy of a draft of the safety element or amendment and any technical studies used for developing the safety element. The division may review drafts submitted to it to determine whether they incorporate known seismic and other geologic hazard information, and report its findings to the planning agency within 30 days of receipt of the draft of the safety element or amendment pursuant to this subdivision. The legislative body shall consider the division's findings

prior to final adoption of the safety element or amendment unless the division's findings are not available within the above prescribed time limits or unless the division has indicated to the city or county that the division will not review the safety element. If the division's findings are not available within those prescribed time limits, the legislative body may take the division's findings into consideration at the time it considers future amendments to the safety element. Each county and city shall provide the division with a copy of its adopted safety element or amendments. The division may review adopted safety elements or amendments and report its findings. All findings made by the division shall be advisory to the planning agency and legislative body.

(b) (1) The draft element of or draft amendment to the safety element of a county or a city's general plan shall be submitted to the State Board of Forestry and Fire Protection and to every local agency that provides fire protection to territory in the city or county at least 90 days prior to either of the following:

(A) The adoption or amendment to the safety element of its general plan for each county that contains state responsibility areas.

(B) The adoption or amendment to the safety element of its general plan for each city or county that contains a very high fire hazard severity zone as defined pursuant to subdivision (i) of Section 51177.

(2) The State Board of Forestry and Fire Protection shall, and a local agency may, review the draft or an existing safety element and recommend changes to the planning agency within 60 days of its receipt regarding both of the following:

(A) Uses of land and policies in state responsibility areas and very high fire hazard severity zones that will protect life, property, and natural resources from unreasonable risks associated with wild land fires.

(B) Methods and strategies for wild land fire risk reduction and prevention within state responsibility areas and very high fire hazard severity zones. These methods and strategies shall reflect accepted best practices in the most recent guidance document entitled "Fire Hazard Planning, General Plan Technical Advice Series," as identified in Section 65040.21.

(3) (A) Prior to the adoption of its draft element or draft amendment, the board of supervisors of the county or the city council of a city shall consider the recommendations, if any, made by the State Board of Forestry and Fire Protection and any local agency that provides fire protection to territory in the city or county. If the board of supervisors or city council determines not to accept all or some of the recommendations, if any, made by the State Board of Forestry and Fire Protection or local agency, the board of supervisors or city council shall communicate in writing to the State Board of Forestry and Fire Protection or the local agency, its reasons for not accepting the recommendations.

(B) If the board of supervisors or city council proposes not to adopt the board's recommendations concerning its draft element or draft amendment, the board, within 15 days of receipt of the board of supervisors' or city council's written response, may request in writing a consultation with the board of supervisors or city council to discuss the board's recommendations and the board of supervisors' or city council's response. The consultation may be conducted in person, electronically, or telephonically. If the board requests a consultation pursuant to this subparagraph, the board of supervisors or city council shall not approve the draft element or draft amendment until after consulting with the board. The consultation shall occur no later than 30 days after the board's request.

(4) If the State Board of Forestry and Fire Protection's or local agency's recommendations are not available within the time limits required by this section, the board of supervisors or city council may act without those recommendations. The board of supervisors or city council shall take the recommendations into consideration the next time it considers amendments to the safety element.

SEC. 6. Section 4290.5 is added to the Public Resources Code, to read:

4290.5. (a) On or before July 1, 2021, and every five years thereafter, the board, in consultation with the State Fire Marshal, shall survey local governments, including counties, cities, and fire districts to identify existing subdivisions located in a state responsibility area or a very high fire hazard severity zone, identified pursuant to Section 51178 of the Government Code, without a secondary egress route that are at significant fire risk.

(b) (1) The board, in consultation with the State Fire Marshal and the local government that identified the subdivision, shall develop recommendations to improve the subdivision's fire safety. The recommendations may include, but are not limited to, the following:

(A) Creating secondary access to the subdivision.

(B) Improvements to the existing access road.

(C) Other additional fire safety measures.

(2) The board shall provide the final recommendations developed pursuant to this subdivision to the local government that identified the subdivision and to the residents of the subdivision.

(c) The board may enter into contracts with an independent group to conduct the survey required in subdivision (a).

(d) For purposes of this section, "subdivision" means an existing residential development of more than 30 dwelling units.

(e) The board shall maintain a list of the subdivisions identified in subdivision (a) and the status of the implementation of the recommendations provided pursuant to subdivision (b).

SEC. 7. Section 4291 of the Public Resources Code is amended to read:

4291. (a) A person who owns, leases, controls, operates, or maintains a building or structure in, upon, or adjoining a mountainous area, forest-covered lands, brush-covered lands, grass-covered lands, or land that is covered with flammable material, shall at all times do all of the following:

(1) Maintain defensible space of 100 feet from each side and from the front and rear of the structure, but not beyond the property line except as provided in paragraph (2). The amount of fuel modification necessary shall take into account the flammability of the structure as affected by building material, building standards, location, and type of vegetation. Fuels shall be maintained in a condition so that a wildfire burning under average weather conditions would be unlikely to ignite the structure. This paragraph does not apply to single specimens of trees or other vegetation that are well-pruned and maintained so as to effectively manage fuels and not form a means of rapidly transmitting fire from other nearby vegetation to a structure or from a structure to other nearby vegetation. The intensity of fuels management may vary within the 100-foot perimeter of the structure, the most intense being within the first 30 feet around the structure. Consistent with fuels management objectives, steps should be taken to minimize erosion. For the purposes of this paragraph, "fuel" means any combustible material, including petroleum-based products and wildland fuels.

(2) A greater distance than that required under paragraph (1) may be required by state law, local ordinance, rule, or regulation. Clearance beyond the property line may only be required if the state law, local ordinance, rule, or regulation includes findings that the clearing is necessary to significantly reduce the risk of transmission of flame or heat sufficient to ignite the structure, and there is no other feasible mitigation measure possible to reduce the risk of ignition or spread of wildfire to the structure. Clearance on adjacent property shall only be conducted following written consent by the adjacent landowner.

(3) An insurance company that insures an occupied dwelling or occupied structure may require a greater distance than that required under paragraph (1) if a fire expert, designated by the director, provides findings that the clearing is necessary to significantly reduce the risk of transmission of flame or heat sufficient to ignite the structure, and there is no other feasible mitigation measure possible to reduce the risk of ignition or spread of wildfire to the structure. The greater distance may not be beyond the property line unless allowed by state law, local ordinance, rule, or regulation.

(4) Remove that portion of a tree that extends within 10 feet of the outlet of a chimney or stovepipe.

(5) Maintain a tree, shrub, or other plant adjacent to or overhanging a building free of dead or dying wood.

(6) Maintain the roof of a structure free of leaves, needles, or other vegetative materials.

(7) Prior to constructing a new building or structure or rebuilding a building or structure damaged by a fire in an area subject to this section, the construction or rebuilding of which requires a building permit, the owner shall obtain a certification from the local building official that the dwelling or structure, as proposed to be built, complies with all applicable state and local building standards, including those described in subdivision (b) of Section 51189 of the Government Code, and shall provide a copy of the certification, upon request, to the insurer providing course of construction insurance coverage for the building or structure. Upon completion of the construction or rebuilding, the owner shall obtain from the local building official, a copy of the final inspection report that demonstrates that the dwelling or structure was constructed in compliance with all applicable state and local building standards, including those described in subdivision (b) of Section 51189 of

the Government Code, and shall provide a copy of the report, upon request, to the property insurance carrier that insures the dwelling or structure.

(b) A person is not required under this section to manage fuels on land if that person does not have the legal right to manage fuels, nor is a person required to enter upon or to alter property that is owned by any other person without the consent of the owner of the property.

(c) (1) Except as provided in Section 18930 of the Health and Safety Code, the director may adopt regulations exempting a structure with an exterior constructed entirely of nonflammable materials, or, conditioned upon the contents and composition of the structure, the director may vary the requirements respecting the removing or clearing away of flammable vegetation or other combustible growth with respect to the area surrounding those structures.

(2) An exemption or variance under paragraph (1) shall not apply unless and until the occupant of the structure, or if there is not an occupant, the owner of the structure, files with the department, in a form as the director shall prescribe, a written consent to the inspection of the interior and contents of the structure to ascertain whether this section and the regulations adopted under this section are complied with at all times.

(d) The director may authorize the removal of vegetation that is not consistent with the standards of this section. The director may prescribe a procedure for the removal of that vegetation and make the expense a lien upon the building, structure, or grounds, in the same manner that is applicable to a legislative body under Section 51186 of the Government Code.

(e) The department shall develop, periodically update, and post on its Internet Web site a guidance document on fuels management pursuant to this chapter. Guidance shall include, but not be limited to, regionally appropriate vegetation management suggestions that preserve and restore native species that are fire resistant or drought tolerant, or both, minimize erosion, minimize water consumption, and permit trees near homes for shade, aesthetics, and habitat; and suggestions to minimize or eliminate the risk of flammability of nonvegetative sources of combustion such as woodpiles, propane tanks, decks, and outdoor lawn furniture.

(f) As used in this section, "person" means a private individual, organization, partnership, limited liability company, or corporation.

SEC. 8. Section 4291.3 of the Public Resources Code is amended to read:

4291.3. (a) Subject to any other applicable law, a state or local fire official, at his or her discretion, may authorize an owner of property, or his or her agent, to construct a firebreak, or implement appropriate vegetation management techniques, to ensure that defensible space is adequate for the protection of a hospital, adult residential care facility, school, aboveground storage tank, hazardous materials facility, or similar facility on the property. The firebreak may be for a radius of up to 300 feet from the facility, or to the property line, whichever distance is shorter.

(b) The director may authorize an owner of a property not listed in subdivision (a) to construct a firebreak, or implement appropriate vegetation management techniques, within a radius of up to 300 feet from a structure, or to the property line, whichever distance is shorter, if it is determined by the director as necessary to protect life, property, and natural resources from unreasonable risks associated with wild land fires.

SEC. 9. Section 4295.5 is added to the Public Resources Code, to read:

4295.5. (a) Notwithstanding any other law, including Section 4295, any person who owns, controls, operates, or maintains any electrical transmission or distribution line may traverse land as necessary, regardless of land ownership or express permission to traverse land from the landowner, after providing notice and an opportunity to be heard to the landowner, to prune trees to maintain clearances pursuant to Section 4293, and to abate, by pruning or removal, any hazardous, dead, rotten, diseased, or structurally defective live trees. The clearances obtained when the pruning is performed shall be at the full discretion of the person that owns, controls, operates, or maintains any electrical transmission or distribution line, but shall be no less than what is required in Section 4293. This section shall apply to both high fire threat districts, as determined by the California Public Utilities Commission pursuant to its rulemaking authority, and to state responsibility areas.

(b) Nothing in subdivision (a) shall exempt any person who owns, controls, operates, or maintains any electrical transmission or distribution line from liability for damages for the removal of vegetation that is not covered by any easement granted to him or her for the electrical transmission or distribution line.

SEC. 10. No reimbursement is required by this act pursuant to Section 6 of Article XIII B of the California Constitution for certain costs that may be incurred by a local agency or school district because, in that regard, this act creates a new crime or infraction, eliminates a crime or infraction, or changes the penalty for a crime or infraction, within the meaning of Section 17556 of the Government Code, or changes the definition of a crime within the meaning of Section 6 of Article XIII B of the California Constitution.

However, if the Commission on State Mandates determines that this act contains other costs mandated by the state, reimbursement to local agencies and school districts for those costs shall be made pursuant to Part 7 (commencing with Section 17500) of Division 4 of Title 2 of the Government Code.

Enso Verde℠
A KENDAL AFFILIATE

ZEN-INSPIRED SENIOR LIVING IN VENTURA COUNTY

January 29, 2026

County of Ventura
Resource Management Agency Planning Division
800 S. Victoria Avenue Ventura, CA 93009-
1740 Attn: Michael Conger

RE: Brandeis-Bardin Campus

To whom it may concern,

We are pleased to support project application for Modification of CUP 1776 for the Brandeis Bardin Campus in Simi Valley. The project is County File Number PL22-0032, and the State Clearinghouse Number is 2023110297. The Project Description is following this letter.

Kendal at Ventura owns the 20-acre property on the southwest corner of Tapo Canyon Road and Guardian Street, adjacent to the Brandeis-Bardin Campus. This property is the "Endo Verde" project, a planned senior living community. We support American Jewish University's Brandeis- Bardin campus and the planned improvements.

Should you have any questions, I can be reached at 617-548-3828 or at pkuenstner@icloud.com

Paul Kuenstner

Board Chair, Enso Verde

Cc: Jay Sanderson
Susan O'Connell
Mitchell Menzer

Project Description
Modification to
CUP No. 1776,
County File No.:PL22-0032

The project description is as follows:

This modification to CUP 1776 proposes the continued operation and maintenance of a recreational camp with special events at the existing American Jewish University's Brandeis Bardin Campus (campus). Assembly Uses would also continue to be conducted at this facility. Specifically, the following uses and events are proposed to continue:

Recreational Uses: The Summer camp season is held onsite for 10 weeks. Camp Alonim is a cross-denominational camp for children ages 6 through 16 that presently hosts close to 400 campers each session every summer. It is proposed to increase the number of campers to 500 for each session. Of the 500 campers, approximately 400 are overnight and 100 are daytime. Approximately 100 to 150 staff members would be onsite during the summer as support for the camp operations. In support of the camp uses, we propose the construction of 13 new camper cabins and 3 counselor cabins as shown on the included site plan and architectural exhibits. The new camper cabins are ~1930 square feet each (interior) and the counselor cabins are 441 sq. feet each (interior). A total of 26,400 square feet of new building construction at Camper Village.
The Brandeis Collegiate Institute (BCI) includes 75 young Jewish adults, ages 18 to 30 who attend a summer session of 3-4 weeks.

Temporary Events (e.g., weddings, bar/bat mitzvahs, graduations) & Assembly Uses (educational day and overnight programs sponsored by Jewish and secular schools, synagogues, churches, and community organizations.

A maximum of 166 temporary events/assembly uses would continue to occur onsite in each calendar year. These activities may typically occur any day of the week, between the hours of 10 a.m. and 10 p.m. Activities generally are one of three types:

- **Type 1 Events:** Up to 6 events per year with no more than 1,000 attendees.
- **Type 2 Events:** Up to 10 events per year with no more than 500 attendees.
- **Type 3 Events:** Up to 150 events per year with no more than 300 attendees.

Amplified music is proposed to be used at several events. Foodservice will continue to be provided through the operation of an onsite kitchen. The food will be prepared under strict Kashrut guidelines. Outdoor events will occur at the dance pavilions, on the patio outside of the House of the Book and on Terry Field. Indoor events will be held at Wapner Patio, Gunther Dining Hall, Pritzker Dining Hall and the House of the Book. Parking for these events would continue to be provided at the existing parking locations as well as at the proposed 58 new spaces adjacent to the new Welcome Center.

The activities associated with the recreational camp and assembly uses would occur throughout the campus in outdoor areas and within existing and proposed structures. Existing structures include meeting halls, two dining halls, two outdoor dance pavilions, cabins and cottages for guests. Proposed structures, other than the cabins mentioned for Camper Village, include a 4,460 sq. ft. Welcome Center and a minor addition to the Art Pavilion of 292 square feet of indoor space and a covered patio of 2,000 square feet. An inventory of the structures associated with the proposed project is included in the project submittal. The campus is used 365 days a year for the uses described above on a rotating basis. All meals will continue to be provided by the University food service department under strict Kashrut observation. Approximately 500 parking spaces are presently provided onsite and used by staff and guests.

Access to the site is provided by the two-lane asphalt private road known as Peppertree Lane. Peppertree Lane connects to Tapo Canyon Road at the intersection with Guardian Road. It is the intent of this modification to redirect much of the camper traffic to the High Road rather than the present circulation of using Peppertree Lane through the site. This is an all-around safer traffic flow while also having less impact on Meir Creek. Water to the site will continue to be provided by the Brandeis Mutual Water Company purchasing water from Calleguas Municipal Water District. The water provided by Calleguas Municipal Water District is conveyed to two on-site reservoirs. These reservoirs are utilized for domestic water use and fire suppression by the Brandeis Mutual Water Company. Waste water disposal service will continue to be provided by the City of Simi Valley. All area of new construction will have significant landscaping installed. With special emphasis on the use of native plants in and around the Welcome Center and Camper Village. All new construction, but for Central Green, will be constructed in one phase. Subject to fundraising goals, Central Green will be constructed shortly after the completion of Camper Village and the Welcome Center. The grading, development, use, and maintenance of the property, the size, shape, arrangement, and location of structures, parking areas and landscape areas, and the protection and preservation of resources shall conform to the project description above and all approved County land use exhibits in support of the Project.