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***GAVIN NEWSOM, Governor***
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August 14, 2025

Rachel Dimond
City of Ventura
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**SUBJECT: CITY OF VENTURA GENERAL PLAN UPDATE, DRAFT ENVIRONMENTAL IMPACT REPORT, SCH NO. 2024050045; CITY OF VENTURA, VENTURA COUNTY**

Dear Rachel Dimond:

The California Department of Fish and Wildlife (CDFW) has reviewed the City of Ventura's (City) Draft Environmental Impact Report (DEIR) from the City of Ventura (City; Lead Agency) for the Ventura General Plan Update (Project). Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife or be subject to Fish and Game Code.

**CDFW's Role**

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust for the people of the state [Fish & Game Code, §§ 711.7, subdivision (a) & 1802; Pub. Resources Code, § 21070; California Environmental Quality Act (CEQA) Guidelines, [§ 15386, subdivision (a)]. CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802). CDFW is also directed to provide biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect state fish and wildlife resources.

CDFW is also submitting comments as a Responsible Agency under CEQA (Public Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code, including lake and streambed alteration regulatory authority (Fish & Game Code, § 1600 *et seq*.). To the extent implementation of the Project as proposed may result in "take" of any species protected under the California Endangered Species Act (CESA; Fish & Game Code, § 2050 *et seq.*), or CESA-listed rare plant pursuant to the Native Plant Protection Act (NPPA; Fish & Game Code, §1900 *et seq.*), CDFW recommends the Project proponent obtain appropriate authorization under the Fish and Game Code.

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**Project Description and Summary**

**Proponent:** City

**Objective:** The purpose of the Ventura General Plan is to determine the physical layout and future development of the City into the year 2050. The Planning Area involves the city limits, which encompass approximately 22 square miles, and the City's Sphere of Influence (SOI), which contains approximately 13 acres within unincorporated Ventura County. A Housing Element was updated and adopted in 2023 and is included in the General Plan Update. The Ventura General Plan Update will provide the context to effectively plan and manage the City's growth based on an updated set of goals, policies, and implementation actions. The DEIR analyzes 6,743 new housing units (105 single family, 1,427 townhomes, 4,936 multifamily homes, 275 accessory dwelling units) and 3,884 new jobs. The DEIR also includes four alternatives which include:

**Project Alternatives:** Alternative 1 (No Project): The No Project Alternative involves continued implementation of the City's current General Plan, originally adopted in 2005. The No Project Alternative assumes the proposed plan would not be adopted and future development would be carried out in accordance with the City's existing General Plan policies and land use designations through the year of 2050. Thus, while growth in the region and in the Planning Area would still occur, any new development in Ventura would occur consistently with the existing land use designations and the allowed uses in each designation. Similarly, any new infrastructure would occur as envisioned in the existing General Plan;

Alternative 2 (Expansion): The Expansion Alternative would include policies and a development framework to increase residential and job capacity within the Save Our Open Space and Agricultural Resources voter initiative (SOAR) areas and the SOI. The Expansion Alternative would change land use designation such that it would minimize density increases in the following areas: Downtown, Five Points/Pacific View Mall, and the Midtown Corridors. The Expansion Alternative would consider development of all 854 acres of SOAR lands. Development within the SOAR areas would continue to require a vote of the people prior to a property owner-initiated annexation and land use change. Growth projections under the Expansion Alternative would increase as there would be potentially thousands more residential units built within the SOAR areas which would increase the population significantly;

Alternative 3 (Distributed Development): The Distributed Development Alternative would include policies and a development framework to increase development throughout the City. The Distributed Development Alternative would change land use designations such that it would allow for minimal increases in density in targeted locations and allow for development in SOAR areas. The Distributed Development Alternative would consider development of approximately 540 acres of SOAR lands. Development within the SOAR areas would continue to require a vote of the people prior to a property owner-initiated annexation and land use change. Growth projections under the Distributed Development Alternative would increase as there would be potentially hundreds more residential units built within the SOAR areas which would increase the population significantly. Development within the City would be similar to the proposed Ventura General Plan Update and;

Alternative 4 (Reduced Development): Under the Reduced Development Alternative, proposed development would be limited to the Downtown area of the City of Ventura, significantly

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reducing the City's overall growth projections compared to the proposed plan. The Reduced Development Alternative would result in approximately 3,000 proposed residences added to the Downtown area, similar to the proposed plan. Development throughout the rest of the City would not occur under this alternative. This alternative focuses on future housing and commercial development within the existing urban core, promoting infill development, improving access to transit and services, and reducing vehicle miles traveled in support of the City's sustainability and climate goals. By concentrating growth Downtown, the alternative would avoid or greatly minimize development in outlying areas, thereby reducing potential impacts to environmentally sensitive resources, agricultural lands, and the urban wildland interface.

**Location:** The Project would apply to the entire City of Ventura and the City's unincorporated SOI. The City is located in the western region of Ventura County, bordering the Pacific Ocean and stretching inland along State Route (SR) 126 until just past Wells Road.

**Timeframe:** Projects would be tiered from the General Plan over a 25-year planning period through to the year 2050.

**Biological Setting:** The Project site encompasses the entire City of Ventura and its SOI. The City limits contain approximately 22 square miles and the City's SOI contains approximately 13 acres within unincorporated Ventura County. Within the City limits there are highly developed areas; single family residences comprise 39%, multifamily residential use comprises 7% of the area, parks and recreational facilities comprise 6.9%, retail/commercial centers comprise 5.8%, agricultural uses comprise 5.1%, and 5.3% of land within the City's limits is vacant. The Planning Area primarily supports urban development; however, a substantial amount of open space (over 11,000 acres), occurs within the Planning Area to the north and northwest, primarily in the Ventura Hills (Hillsides and Taylor Ranch within Figure ES-1 of the DEIR). These open space areas are characterized by rolling hillsides consisting of grassland, scrubland, and woodland habitats. The City of Ventura is bordered by the Ventura River to the northwest, the Santa Clara River to the south, and the Pacific Ocean to the west. Several barrancas also pass through the City.

The City prepared a DEIR which included a discussion on the existing biological resources and evaluates the significance of potential impacts to sensitive biological resources that could result from implementation of the proposed Ventura General Plan, This discussion was based on the utilization of databases that include information on distribution of vegetation communities, species, topography, etc. within the City of Ventura. The use of databases such as California Natural Diversity Database (CNDDB) and California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants revealed several special status species have potential to be present within the City of Ventura. These species include but are not limited to: Crotch's bumble bee (*Bombus crotchii*; State Candidate Endangered), monarch – California overwintering population (*Danaus plexippus plexippus pop. 1*; Endangered Species Act (ESA) Candidate), Santa Ana sucker (*Catostomus santaanae*; ESA listed and CDFW Species of Special Concern (SSC)); unarmored threespine stickleback (*Gasterosteus aculeatus williamsoni*; ESA and CESA- listed, Fully Protected), steelhead – southern California Distinct Population Segment (*Oncorhynchus mykiss irideus pop.*
*10*; ESA and CESA- listed), foothill yellow-legged frog (*Rana boylii pop. 6*; ESA and CESA-listed), California red-legged frog (*Rana draytonii*; ESA- listed, SSC), southwestern pond turtle (*Actinemys pallida*; ESA- Proposed Threatened, SSC), tricolored blackbird (*Agelaius tricolor*; ESA-listed, SSC), western snowy plover (*Charadrius nivosus nivosus*; ESA-listed, SSC),

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Western yellow-billed cuckoo (*Coccyzus americanus occidentalis*; ESA and CESA- listed), Southwestern willow flycatcher (*Empidonax traillii extimus*; ESA and CESA- listed), California condor (*Gymnogyps californianus*; ESA and CESA- listed, Fully Protected), California black rail (*Laterallus jamaicensis coturniculus*; CESA-listed, Fully Protected), Belding's savannah sparrow (*Passerculus sandwichensis beldingi*; CESA-listed), Coastal California gnatcatcher (*Polioptila californica californica*; ESA-listed, SSC), Bank swallow (*Riparia riparia*; CESA-listed), California least tern (*Sternula antillarum browni*; ESA and CESA-listed, Fully Protected), Least Bell's vireo (*Vireo bellii pusillus*; ESA and CESA-listed), Braunton's milk-vetch (*Astragalus brauntonii*; ESA-listed), Ventura marsh milk-vetch (*Astragalus pycnostachyus* var. *lanosissimus*; ESA and CESA-listed), Salt marsh bird's-beak (*Chloropyron maritimum* ssp. *maritimum*; ESA and CESA-listed), Verity's dudleya (*Dudleya verity*; ESA-listed), and Conejo buckwheat (*Eriogonum crocatum*, CESA-listed).

**Comments and Recommendations**

CDFW appreciates the City's efforts in offering avoidance, minimization, and mitigation measures for biological resources. CDFW offers the comments and recommendations below to assist the City in adequately identifying, avoiding, and/or mitigating significant, or potentially significant, direct and indirect impacts on fish and wildlife biological resources of future Projects tiered from the DEIR.

**Specific Comments**

**Comment #1: Impacts to Wildlife Corridors, Linkages, and Critical Habitat**

**Issue:** Future Projects tiered off the DEIR have potential to impact and further degrade the Ventura River and the Santa Clara River (Santa Monica-Sierra Madre linkage) wildlife corridors, linkages, and adjacent critical habitat. The corridors coincide with critical habitat for four special status species. CDFW believes further analysis is needed to identify the cumulative impacts to wildlife corridors, linkages, and critical habitat.

**Specific Impact:** Updates to land use proposed within the General Plan may significantly impact the Ventura River and the Santa Clara River wildlife corridors as well as critical habitat for special status species. Land use changes within the General Plan include the reduction of open space and agricultural land use on parcels bordering these wildlife corridors and critical habitats. Critical habitat is present along the Santa Clara River corridor for southern California steelhead trout, southwestern willow flycatcher, tidewater goby, and western snowy plover (CDFWa 2022, CDFWb 2023). Critical habitat for southern California steelhead trout and southwestern willow flycatcher is also present along the Ventura River corridor (CDFWc-d 2023). Projects tiered from the DEIR may further reduce/degrade critical habitats and reduce transitory opportunities due to impacts on corridors and linkage areas.

**Why Impact Would Occur:** Figure 2-1 of the DEIR displays the General Plan's Proposed Land use map. This figure can be compared to the 2005 General Plan land use map to identify proposed changes in land use designation (Figure 1). Upon reviewing these maps, it was identified that agricultural land use areas abutting the Ventura River are proposed to be converted to the General Industrial (3 story) land use designation. Likewise, large areas of agricultural land abutting the Santa Clara River, as well as areas of designated critical habitat for southwestern willow flycatcher, are proposed to be converted to Light Industrial/Flex (3

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story). These agricultural areas may provide buffers to wildlife corridors/critical habitat from increased noise, light, vibration, edge effects, and human activity. Likewise, they may act as stepping stones for wildlife traversing developed areas of the City laterally. These open spaces and agricultural areas abut barrancas, which flow north to south from the Hillside open space area to the Santa Clara River. Moreover, portions of southwestern willow flycatcher critical habitat will be redesignated as light industrial under the 2025 General Plan. Critical habitat is designed to protect the essential physical and biological features of a landscape and essential areas in the appropriate quantity and spatial arrangement that a species needs to survive and reproduce and ultimately be conserved (USFWS 2017).The DEIR states, "[p]otentially significant effects on candidate, sensitive, or special-status species would occur if temporary disturbance associated with construction projects or permanent impacts due to development facilitated by the project would result in incremental direct loss of habitat, fragmentation of larger open areas and wildlife corridors, or disturbance of special-status wildlife or vegetation species." Although several BIO-measures and policies were cited as mitigating factors, they may not provide enough protections to natural resources nor address potential cumulative impacts. CDFW acknowledges that the City has provided several BIO-Measures to avoid and minimize impacts to wildlife and wildlife resources. However, CDFW believes these measures are more appropriate for addressing impacts at the species level/at a project-by-project basis and does not mitigate for potential impacts at a landscape/cumulative level. No specific BIO-Measures were provided to help mitigate impacts which may substantially impede the movement of native resident or migratory fish or wildlife species, or conflict with established native resident or migratory wildlife corridors. Technical analysis on cumulative impacts should be supported by studies, technical documents, geospatial layers, and figures. Absent of these materials, CDFW cannot sufficiently assess whether these measures and policies are sufficient in mitigating impacts below the threshold of significance.

The Santa Clara River Corridor and the Ventura River Corridor are two of the few remaining coastal connections in the South Coast Ecoregion. Wildlife often use riparian corridors and ridgelines to move throughout their range (Jennings 2013 & Dickson 2005). As stated within the DEIR, "[These corridors] are designed to protect landscape linkages for 20 focal species that are sensitive to habitat loss and fragmentation." The DEIR states that "the majority of development facilitated by the proposed plan would be infill development in areas that have been previously disturbed and thus would not be located in areas that would impede the movement of native resident or migratory fish or wildlife species, or conflict with established native resident or migratory wildlife corridors." However, as part of the DEIR, large portions of agricultural land abutting corridors, linkages, and critical habitats will be redesignated as industrial. Future Projects tiered from the DEIR may cause direct impacts through development and further fragmentation of corridors, linkages, and critical habitats as well as indirect impacts through increased noise, light, vibration, edge effects, and human activity. CDFW is concerned that changes in land usage and future development near/within these areas may result in reduced nesting/foraging habitat, increased noise, light, human activity, and vibration, which may have negative impacts to wildlife movement and persistence in the surrounding area. Substantial noise may adversely affect wildlife species in several ways as wildlife responses to noise can occur at exposure levels of only 55-60 decibel (dB) (Barber et al. 2009). Noise can also affect predator-prey relationships as many nocturnal animals such as bats and owls primarily use auditory cues (i.e., hearing) to hunt, and have been found to have a high likelihood of occurrence in the area. Additionally, many prey species increase their vigilance behavior

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when exposed to noise because they need to rely more on visual detection of predators when auditory cues may be masked by noise (Rabin et al. 2006, Quinn et al. 2017). Moreover, the potential development within these proposed land use designations will increase ambient lighting around the corridors/critical habitat. Increased ambient lighting levels can increase predation risks and disorientation and disrupt normal behaviors of wildlife in adjacent feeding, breeding, and roosting habitat (Longcore and Rich 2004). Increased development may also reduce habitat quality due to edge effects. Edge effects that may occur as a result of development adjacent to natural areas are introduction of invasive species, encroachment on suitable habitat for special-status species, increased pollutants, altered microclimate conditions, and introduction of insect/pest infestations.

Likewise, the DEIR does not touch upon the potential use of existing agricultural land, open spaces, and barrancas as stepping stones for wildlife movement between corridors. The DEIR sates, “Due to the existing level of development, the urban areas of Ventura are not considered wildlife corridors.” While wildlife corridors may only be present along the Ventura and Santa Clara Rivers, there is no study or analysis on the use or potential use of barrancas and abutting agricultural/open spaces traversing for wildlife movement. Referencing the 2005 Land Use map, it appears that areas of agricultural land and open spaces could provide stepping stones for wildlife traversing laterally through the City from the Ventura River Corridor and Hillside open space to the Santa Clara River, specifically surrounding the Arundell Barranca and Harmon Barranca.

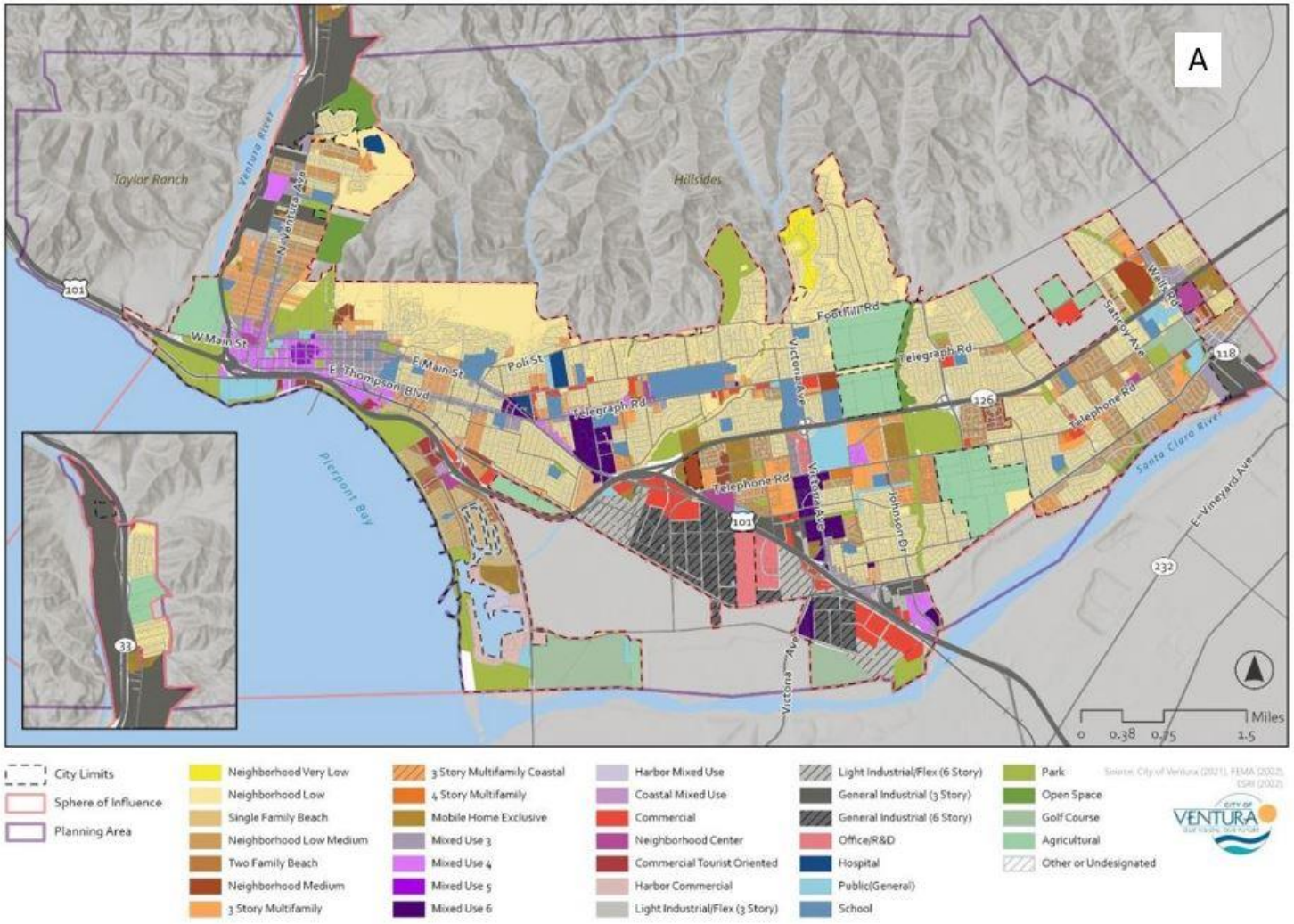
Within the DEIR it states that the impacts to wildlife corridors is less than significant without mitigation. However, it is CDFW’s opinion that potential impacts have not been sufficiently analyzed to support this statement. Although a majority of the proposed development is proposed within developed areas of the City, a discussion as to the implications to proposed changes in land use was not included within the DEIR. Development in these areas could result in loss/degradation of critical habitat, cover, nesting habitat, foraging habitat, and transitory stepping stones for wildlife. Likewise, the document does not touch upon the potential use of several barrancas and fragmented agricultural/open space areas for wildlife movement. Absent of this analysis, the proposed changes in land use to areas surrounding the Ventura River and Santa Clara River corridors and subsequently, critical habitat for four special status species, may lead to future unmitigated impacts.

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## Proposed General Plan Land Use Map

City of Ventura Preferred General Plan Land Use



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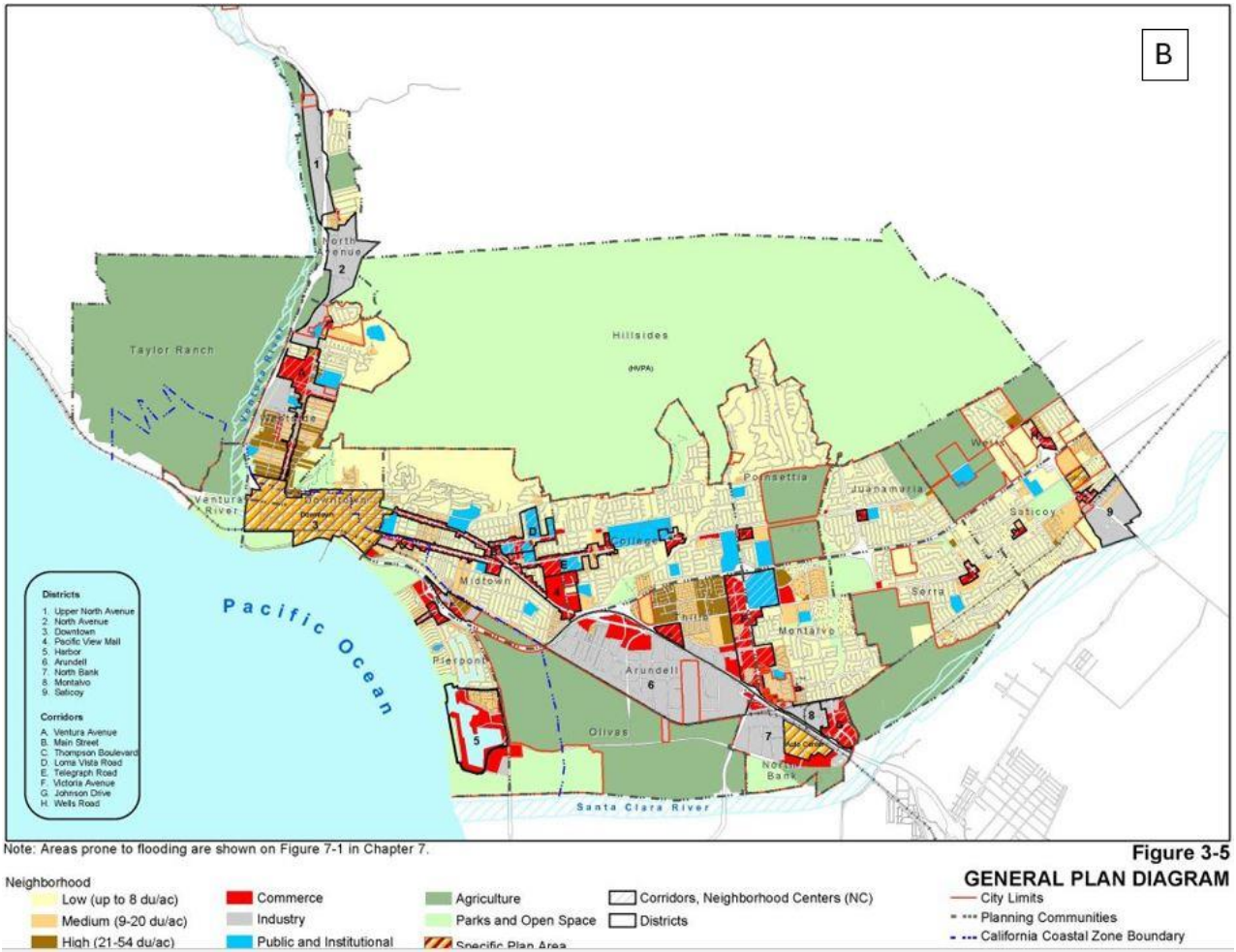



Figure 1. Proposed Land Use Map for 2025 General Plan (A) vs. Land Use map for 2005 General Plan (B). Notice the proposed changes in land use to areas abutting the Santa Clara and Ventura Rivers.

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**Evidence Impact Would Be Significant:** The Project area supports a variety of special status species. Impacts to special-status species should be considered significant under CEQA unless they are clearly mitigated below a level of significance. Loss of the area designated as Open Space in particular may result in a substantial adverse direct, indirect, 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 or United States Fish and Wildlife Service (USFWS).

## Recommended potentially feasible mitigation measure(s):

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

**Mitigation Measure #1: Land Acquisition for Mitigation:** Policy 7.6 within the document mentions a “rewilding” effort, which can include creating wildlife corridors. This Policy shall be expanded into a mitigation measure to better ensure the preservation of important areas associated with wildlife movement. The Applicant shall retain contiguous land parcels surrounding the Santa Clara River and Ventura River corridors. If land within the boundaries of the City is already protected, then acquisition shall expand past the City boundaries to aid in the preservation of the surrounding corridors. Land retained shall be protected in perpetuity from encroachment and development to ensure the preservation of the wildlife corridors. The mitigation lands shall be protected in perpetuity under a conservation easement dedicated to a local land conservancy or other appropriate entity that has been approved to hold and manage mitigation lands pursuant to Assembly Bill 1094 (2012). Assembly Bill 1094 amended Government Code, sections 65965-65968. Under Government Code, section 65967(c), the lead agency must exercise due diligence in reviewing the qualifications of a governmental entity, special district, or nonprofit organization to effectively manage and steward land, water, or natural resources on mitigation lands it approves. An appropriate endowment shall be provided for the long-term management of mitigation lands. A conservation easement and endowment funds shall be fully acquired, established, transferred, or otherwise executed prior to implementing Project-related ground disturbing activities and prior to the City’s issuance of grading permits.

**Recommendation #1: Avoidance:** CDFW recommends Projects that are tiered off of the DEIR do not result in conversion of critical habitat, sensitive habitat, corridors/linkages, or open space into developed areas. Likewise, Projects tiered off the DEIR should avoid blocking or further encroaching into wildlife corridors, linkages, critical habitat, and open spaces. Encroachment onto sensitive habitats/open space creates an abrupt transition between two different land uses. Encroachment onto sensitive habitats/open space could affect environmental and biological conditions and increase the magnitude of edge effects on biological resources.

**Recommendation #2: Analysis of Impacts to Corridors, Linkages, Open Spaces, and Critical Habitat:** CDFW recommends that all future Projects tiered off the DEIR should conduct specific studies to understand how land use changes and/or development will affect the Ventura River and Santa Clara River corridors. CDFW recommends all future Projects analyze whether they would impact wildlife corridors and essential connectivity blocks within the entirety of the Project area. Impacts include but are not limited to:

a) Direct impacts to, and maintenance of, wildlife corridor/movement areas, including

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access to undisturbed habitats in adjacent areas, due to habitat loss (acreage lost) and fragmentation, narrowing of a wildlife corridor (acreage lost), introduction of barriers to wildlife movement; and

b) Indirect impacts from increased noise, light, and human activity

Likewise, the analysis should include a discussion on, but not limited to:

c) An assessment on areas that would most benefit acquisition and preservation, enhancement of existing habitat, and/or the installation of wildlife crossings and structures with consideration to past, present, and future Projects.

Likewise, all future Projects tiered off the DEIR should conduct specific studies to understand how land use changes and/or development will affect critical habitats and open spaces. Impacts include but are not limited to:

a) Direct impacts to critical habitats and open spaces due to: access to undisturbed habitats in adjacent areas, habitat loss (acreage lost) and fragmentation, loss of nesting/roosting habitat, loss of foraging habitat; and
b) Indirect impacts from increased noise, light, and human activity.

Likewise, the analysis should include a discussion on, but not limited to:

c) An assessment on areas that would be most beneficial for protection in perpetuity for species with consideration to past, present, and future Projects.

**Recommendation #3: Data Set Review:** Data sets to be considered within the analyses of Projects tiered from the DEIR should include but should not be limited to: Missing Linkages in California's landscape CNDDB layer (ds420), South Coast Missing Linkages (ds419), and Essential Connectivity Areas (ds620). Based on these datasets, the Projects should identify areas of possible impact. The Projects should also consider the South Coast Missing Linkages projected "least cost" linkage designs for the South Coast Ecoregion (South Coast Wildlands 2008 & Penrod 2006). Subsequent Projects should also review CDFW's Priority Wildlife Movement Barrier locations report (CDFWe 2020) and National Park Service's (NPS) collar data relating to mountain lion.

**Recommendation #4: No Net Loss of Habitats and Open Space:** There should be no net loss of sensitive habitats/open space. CDFW recommends the DEIR provide measures where any future development facilitated by the Project mitigates (avoids first if feasible) for project-level impacts on sensitive habitats/open space not previously identified in the DEIR. CDFW recommends the DEIR provide a measure where any future development facilitated by the Project establishes unobstructed vegetated buffers and setbacks. The DEIR should provide standards for an effective buffer and setback; however, the buffer and setback distance should be increased at a Project-level as needed.

**Recommendation #5: Crossings as Mitigation:** If impacts to movement corridors or natural habitats occur, future Projects should also include plans to implement or help fund wildlife crossing structures or passages. Future Projects should provide minimum criterion for design features, dimensions, and locations of potential crossings and associated fencing.

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**Comment #2: Impacts to Streams**

**Issue:** Projects tiered off the DEIR could cause potential impacts to streams and wetlands throughout the City of Ventura.

**Specific Impact:** Project activities tiered off the DEIR may impact streams and wetlands due to the implementation of Projects throughout the City. Grading, excavation, vegetation removal, dewatering, introduction of sediment and pollutants could impact the bed, banks, and lower water quality in water bodies in the Project area.

**Why Impact Would Occur:** The DEIR did not include a BIO-Measure that stipulates Projects tiered off the document will notify for a Lake and Streambed Alteration Agreement if impacts were to occur to stream areas and/or associated vegetation. Activities such as excavation, backfilling, vegetation removal or modification, grading, construction, use of heavy equipment, and dewatering could lead to direct and/or indirect impacts to the bed, bank, or channel of streams. Projects tiered off the DEIR may introduce debris, soil, silt, sawdust, rubbish, raw cement/concrete, or washings thereof, asphalt, paint or other coating material, oil or other petroleum products, or any other substances which could be hazardous or deleterious to aquatic life and the surrounding riparian habitat. Entry of these materials into the water system could result in degradation of on-site and downstream water quality in freshwater systems. Excavation and stockpiling of soils may result in the influx of sediment into the system which could result in changes to the streams and alter hydrologic and geomorphic processes that may impact plant and wildlife species. Project activities tiered from the DEIR may also impact tributaries that occur upstream, outside of the Project boundary, where hydrologic connectivity occurs.

**Evidence Impact Would Be Significant:** The Project may impact streams and associated riparian habitats. CDFW exercises its regulatory authority (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:

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

CDFW requires a Lake and Streambed Alteration Agreement (LSA) Agreement when a project activity may substantially adversely affect fish and wildlife resources.

For reasons discussed above, the Project may continue to have a substantial adverse effect on streams and associated riparian habitat through excavation, grading, hydrological interruption, or other means.

**Recommended potentially feasible mitigation measure(s):**

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

**Mitigation Measure #2: Notification:** A BIO-Measure shall be added to the City's MMRP table, which states that Projects tiered from the DEIR, that have the potential to impact streams or associated communities, shall 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 shall determine whether a LSA Agreement is required prior to conducting the proposed activities. A notification package for a LSA may be obtained by accessing CDFW's web site at https://www.wildlife.ca.gov/conservation/lsa (CDFWf 2025).

If necessary, 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 of the Lead Agency for the Project. To minimize additional requirements by CDFW pursuant to section 1600 *et seq.* and/or under CEQA, the CEQA document should fully identify the potential impacts to streams or riparian resources and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the LSA Agreement.

**Recommendation #6:** Projects tiered from the DEIR should avoid impacts to streams, wetlands and associated natural communities.

**Comment #3: Impact to Monarch Butterfly**

**Issue:** The Projects tiered from the DEIR may impact monarch butterfly (*Danaus plexippus*) and monarch butterfly overwintering habitat.

**Specific impacts:** Future development may result in direct impact to monarch butterflies through vegetation removal and tree trimming. Permanent or temporary impacts to overwintering habitat could result in local population decline or local extirpation of monarch butterflies.

**Why impact would occur:** The DEIR states, "…there are known roosting sites throughout the City." CDFW acknowledges that the City Provided several general BIO-Measures/Policies to avoid impacts to monarch and its habitat (BIO-1, BIO-5, and BIO-6) as well as to minimize impacts (BIO-6, Policy 7.3, and Policy 7.4). However, the CEQA document did not provide species specific BIO-Measures to mitigate potential impacts to monarch and its habitat. According to iNaturalist, there are more than 300 observations of monarch butterflies (in varying life stages) within the City of Ventura (iNaturalist 2025). In addition, there are numerous documented overwintering monarch butterfly areas throughout the City (Ventura County 2025). Furthermore, future development throughout the City may require trees and other vegetation to be removed or trimmed. Removing trees during the overwintering period could have direct impacts on monarch butterflies, potentially resulting in injury or mortality; reduced health and vigor; and reduced success during spring and summer migration to breeding sites.

**Evidence impact would be significant:** Monarch numbers have dropped by 99 percent from an estimated four million butterflies just twenty years ago (CDFWg 2022). Given the precipitous decline of monarch butterflies, the monarch butterfly is currently slated to be listed in 2024

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under the Endangered Species Act (CDFWh 2022). The monarch butterfly is included on CDFW's Terrestrial and Vernal Pool Invertebrates of Conservation Priority list and identified as a Species of Greatest Conservation Need in California's State Wildlife Action Plan (CDFWi 2017; CDFWj 2015). Additionally, Fish and Game Code section 1002 prohibits the take or possession of wildlife for scientific research, education, or propagation purposes without a valid Scientific Collection Permit issued by CDFW. This applies to handling monarchs, removing them from the wild, or otherwise taking them for scientific or propagation purposes, including captive rearing. Fish and Game Code section 1021 directs CDFW to take feasible actions to conserve monarch butterflies and the habitats they depend upon for successful migration. Lastly, Fish and Game Code section 1374 directs the Monarch Butterfly and Pollinator Rescue Program, administered by the Wildlife Conservation Board, to recover and sustain populations of monarch butterflies.

The monarch butterfly meets the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines, § 15380). Impacts on the monarch butterfly may require a mandatory finding of significance because the Project would have the potential to threaten to eliminate a plant or animal community and/or substantially reduce the number or restrict the range of an endangered, rare, or threatened species (CEQA Guidelines, §15065). The reduction in the number of monarch butterflies, either directly or indirectly through habitat loss, would constitute a significant impact absent appropriate mitigation. 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 and/or USFWS.

**Recommended potentially feasible mitigation measure(s):**

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

**Mitigation Measure #3:** CDFW recommends the DEIR require future Project proponents to retain a qualified biologist to assess the future development sites for monarch presence and overwintering habitat. A qualified biologist should survey any eucalyptus groves and other trees within the Project site that are suitable for overwintering monarchs. A qualified biologist should conduct multiple surveys for overwintering monarchs where potential overwintering habitat has been identified. Monitoring should be done as frequently as possible during the overwintering season (typically September 15 through March 11) to capture changing distributions through the season and in response to storm events.

**Mitigation Measure #4:** If future development sites support an overwintering habitat/population of monarchs, CDFW recommends the DEIR require future Project proponents to protect, manage, enhance, and restore potential overwintering habitat. The City should require future Project proponents to prepare a long-term Monarch Butterfly Overwintering Habitat Management Plan in consultation with a qualified biologist. A Monarch Butterfly Overwintering Habitat Management Plan should be submitted to the City. At a minimum, the Monarch Butterfly Overwintering Habitat Management Plan should include:

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- Protect: Trees should not be removed in overwintering groves unless a tree poses a safety risk. The critical root zone (CRZ) of trees that are not targeted for removal should be protected. Impacts to a tree's CRZ could result in injury or mortality of the tree causing additional loss of trees and canopy. Shrubs should not be removed in overwintering groves. Shrubs should be maintained to provide a buffer to preserve the microclimate conditions of the overwinter habitat.
- Manage: Management activities, such as tree trimming and mowing, should be conducted in groves from March 15 through September 15 outside of the estimated timeframe when monarchs are likely present on the southern California coast.
- Enhance: Enhance native, insecticide-free nectar sources by planting fall/winter blooming forbs or shrubs within overwintering groves
- Restore: Any trees removed as part of the Project should be replaced with trees at no less than 2:1. Native insecticide-free trees should be planted such as Monterey pine (*Pinus radiata*), Monterey cypress (*Cupressus macrocarpa*), coast redwood (*Sequoia sempervirens*), coast live oak (*Quercus agrifolia*), Douglas fir (*Pseudotsuga menzesii*), Torrey pine (*Pinus torreyana*), western sycamore (*Platanus racemosa*), bishop pine (*Pinus radiata*) and others, as appropriate for location.
- Pesticides: Use of pesticides should be avoided, particularly when monarchs may be present. If pesticides are used, applications should be conducted from March 15 through September 15, when possible. Herbicide should not be applied on blooming flowers. Herbicide should be applied during young plant phases, when plants are more responsive to treatment, and when monarchs and other pollinators are less likely to be on the plants. Whenever possible, targeted application herbicide methods should be used, large-scale broadcast applications should be avoided, and precautions shall be taken to limit off-site movement of herbicides (e.g., drift from wind and discharge from surface water flows). Neonicotinoids or other systemic insecticides, including coated seeds, should not be used any time of the year in monarch habitat due to their ecosystem persistence, systemic nature, and toxicity. Soil fumigants should not be used. Non-chemical weed control techniques should be used when possible.
- Tropical milkweed and pathogens: Non-native tropical milkweed should not be planted in order to minimize the spread of the pathogen *Ophryocystis elektroscirrha* (OE), and to encourage natural monarch migration. OE can build up on tropical milkweed because these plants are evergreen, and they do not die back in the winter. OE can be debilitating and/or lethal to monarchs. If possible, tropical milkweed should be removed and replaced with native, insecticide-free nectar plants suitable for the location

**Mitigation Measure #4:** If future development sites do not support overwintering habitat, CDFW recommends the DEIR require future Project proponents to avoid and minimize impacts on monarch butterflies by enhancing native, insecticide-free nectar sources; avoid planting additional tropical milkweeds; and avoid using pesticides, insecticides, and soil fumigants.

**Additional Recommendations**

**Recommendation # 7: Clarification on Open Space:** CDFW recommends the City clarify open space areas within the proposed land use map. Within Figure ES-1 (Proposed General Plan Land Use Map), the hillside area and Taylor Ranch within the City's Sphere of Influence (SOI) are not provided a designation. Further in the document within Figure 4.4-3 (Regional Wildlife Corridors), these areas are depicted as open space, but there are some non-designated

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areas within the hillside open space area. CDFW recommends providing a new figure that shows the proposed land use for these areas and a discussion of potential changes to the land use designation from the 2005 plan.

**Recommendation #8: Preservation of Open Space:** CDFW recommends the remaining open spaces be protected in perpetuity, especially those that aid permeability for wildlife, those that are associated with riparian communities, and those that include habitat important to special status wildlife and plant species. This includes but is not limited to, the Hillside open space area and the Taylor Ranch area.

**Recommendation #9: Crotch's Bumble Bee:** CDFW Recommends modifying BIO-8 to include the underlined language and remove language with strikethrough:

The City shall add the following as Implementation Program 7.3.2 under Policy 7.3 of the General Plan Parks and Open Space Element: For construction activities located in ~~vacant or undeveloped~~ areas containing open grasslands, shrublands, or chaparral, a habitat assessment for Crotch's bumblebee shall be performed by a qualified biologist knowledgeable and experienced with Crotch's bumblebee (with the appropriate handling permits to conduct focused surveys) and the habitat in which they occur. Special attention will be given to vacant and undeveloped areas with suitable nesting/foraging habitat. If the biologist determines that suitable habitat for Crotch's bumblebee is present, a focused survey shall be performed during the species' active flight period for Crotch's bumblebee and peak blooming period of nectar and pollen sources ~~(May 1 through July 31)~~ (April 1-August 31). The biologist will consider survey materials such as CDFW's Survey Considerations for California Endangered Species Act Candidate Bumble Bee Species. The Crotch's bumblebee survey shall be conducted on foot and shall encompass the entirety of a project site and focus on areas that allow for the highest probability of detection, such as high abundance nectar or pollen sources and rodent burrows that may be used for breeding and nesting. If Crotch's bumblebee is determined to be present, the project proponent shall map the locations of the observed bumblebee, areas of abundant nectar or pollen sources, and any active nesting sites. A report summarizing the results of the habitat assessment and focused survey (if required) shall be prepared by the qualified biologist and shall be submitted to the City prior to the commencement of construction activities. Further, consultation with the CDFW will be necessary in the event Crotch's bumblebee was observed within a project site and an Incidental Take Permit, in accordance with the California Endangered Species Act, may be required prior to initiating any ground disturbance on the site.

**Recommendation #10: Nesting Birds:** CDFW Recommends modifying BIO-7 to include the underlined language and remove language with strikethrough:

For all future development facilitated by the Ventura General Plan, construction activities initiated during the bird nesting season (February 1 – September 15, and as early as January 1 for some raptors), involving removal of vegetation (e.g. trees and shrubs), abandoned structures, or other nesting bird habitat, a pre-construction nesting bird survey shall be conducted no more than 5 days prior to initiation of ground disturbance and vegetation removal. The nesting bird preconstruction survey shall be conducted on foot and shall include a buffer around the construction site at a distance determined by a qualified biologist, including staging and storage areas. The minimum survey radii surrounding the work area shall be the following: 250 feet for common passerine species, ~~for non-raptors~~ 300 feet for special status passerine species, and 1,000 feet for raptors, but shall be adjusted as necessary by a qualified biologist.

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The survey shall be conducted by a qualified biologist familiar with the identification of avian species known to occur in the Ventura region. If construction lapses for ~~seven~~ five days or longer, the qualified biologist shall conduct another focused survey before project activities are reinitiated. If nests are found, an avoidance buffer shall be determined by the biologist dependent upon the species, the proposed work activity, existing disturbances associated with land uses outside of the site. The qualified biologist shall observe the active nest to establish a behavioral baseline of the adults and nestlings, if present. The qualified biologist shall continuously monitor the active nests to detect signs of disturbance and behavioral change as a result of construction impacts, such as noise, vibration, odors, or worker/equipment motion. If signs of disturbance and behavioral changes are observed, the qualified biologist shall require that construction causing those changes cease and may contact CDFW or USFWS for guidance. The buffer shall be demarcated by the biologist with bright orange construction fencing, flagging, construction lathe, or other means to demarcate the boundary. All construction personnel shall be notified of the buffer zone as an "Ecologically Sensitive Area" and to avoid entering the buffer zone during the nesting season. No ground disturbing activities shall occur within the buffer until the biologist has confirmed that breeding/nesting is completed and the young have fledged the nest. Encroachment into the buffer shall occur only at the discretion of the qualified biologist on the basis that the encroachment will not be detrimental to an active nest. A report summarizing the pre-construction survey(s) shall be prepared by a qualified biologist and shall be submitted to the City prior to the commencement of construction activities. Project site plans shall include a statement acknowledging compliance with the federal MBTA and California Fish and Game Code that includes avoidance of active bird nests and identification of Best Management Practices to avoid impacts to active nests, including checking for nests prior to construction activities during February 1 to September 15, and what to do if an active nest is found so that the nest is not inadvertently impacted during grading or construction activities.

**Recommendation #11:** CDFW Recommends modifying BIO-5 to include the underlined language and remove language with strikethrough:

For all work occurring in areas where endangered/threatened species may be present and are at risk of entering the project site during construction, the applicant shall install exclusion fencing along the project boundaries prior to start of construction (including staging and mobilization). The placement of the fence shall be at the discretion of the CDFW/USFWS-approved biologist. This fence shall consist of solid silt fencing placed at a minimum of three feet above grade and two feet below grade and shall be attached to wooden stakes placed at intervals of not more than five feet. The applicant shall inspect the fence ~~weekly~~ daily and following rain events and high wind events and shall be maintained in good working condition until all construction activities are complete.

**Recommendation #12: Updating the California Natural Diversity Database:** CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database [i.e., CNDDB] which may be used to make subsequent or supplemental environmental determinations [Pub. Resources Code, § 21003, subd. (e)]. Information on special status species should be submitted to the CNDDB by completing and submitting CNDDB Field Survey Forms (CDFWk 2023). Information on special status native plant populations and sensitive natural communities, the Combined Rapid Assessment and Relevé Form should be completed and submitted to CDFW's Vegetation Classification and Mapping Program (CDFWl 2023).

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**Recommendation #13: Fuel Modification:** If Projects tiered off the DEIR include fuel modification, CDFW recommends that the final environmental documents include avoidance and mitigation measures for any fuel modification activities conducted within and adjacent to the Project area(s). A weed management plan should be developed for all areas adjacent to open space that will be subject to fuel modification disturbance. CDFW also recommends that any irrigation proposed in fuel modification zones do not allow for the introduction of invasive Argentine ants. Monitoring should also include parameters to identify possible introduction of Argentine ants.

**Recommendation #14: Weed Management Plans:** Weed management plans should be developed for Projects tiered off the DEIR for all Project areas and implemented both during, and for at least 3 yeas post-Project. Non-native weeds including noxious weeds (as listed by the California Invasive Plant Council) (CALIPC 2022) should be prevented from becoming established to control the local spread if invasive plants, both during and after construction. Site visits should be conducted monthly and weekly during the rainy season. The Project areas should be monitored via mapping for new introductions and expansions of non-native weeds. Annual threshold limits, eradication targets, and monitoring should be included in this plan. Monitoring for spread of invasive weeds to adjacent lands should also be included.

**Recommendation #15: In-lieu Fee Programs**. In-lieu fees can be considered a type of deferred mitigation. Future Projects should utilize alternative methods of mitigation such as restoration, enhancement, and acquisition of lands to be protected in perpetuity.

**Recommendation #16: Invasive Pests and Diseases:** Any future Projects that remove vegetation that could host pest species should work with the certified arborist to identify all trees and species for removal from the Project site and inspect those trees for contagious tree diseases including but not limited to: thousand canker fungus (TCD 2021), polyphagous shot hole borer (UCANR 2018), and goldspotted oak borer (UCIPM 2021). If invasive pests and/or diseases are detected, the subsequent Projects should provide an infectious tree disease management plan and describe how it will be implemented to avoid significant impacts under CEQA. To avoid the spread of infectious tree diseases, diseased trees should not be transported from the Project site(s) without first being treated using best available management practices relevant for each tree disease observed.

**Recommendation #17: Mitigation and Monitoring Reporting Plan**: Per Public Resources Code section 21081.6(a)(1), CDFW has provided the City with a summary of our suggested mitigation measures and recommendations in the form of an attached Draft Mitigation and Monitoring Reporting Plan. A final MMRP should reflect results following additional plant and wildlife surveys and the Project's final on and/or off-site mitigation plans.

**Filing Fees**

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

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**Conclusion**

CDFW appreciates the opportunity to comment on the DEIR to assist the City in identifying and mitigating Project impacts on biological resources. CDFW requests an opportunity to review and comment on any response that the City 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 Angela Castanon[1], Environmental Scientist.

Sincerely,

DocuSigned by:
5991E19EF8094C3...
Victoria Tang
Environmental Program Manager
California Department of Fish and Wildlife

ec: California Department of Fish and Wildlife
Victoria Tang, Environmental Program Manager
Frederic (Fritz) Frieman, Senior Environmental Scientist (Supervisory)
Susan (Sue) Howell, Staff Services Analyst
Angela Castanon, Environmental Scientist

Office of Planning and Research
state.clearinghouse@opr.ca.gov

**References:**

1 Phone: (626) 513-6308; Email: Angela.castanon@wildlife.ca.gov

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**Attachment A: Draft Mitigation and Monitoring Reporting Plan**

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

| **Biological Resources (BIO)** | | | |
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| **Mitigation Measure (MM) or Recommendation (REC)** | | **Timing** | **Responsible Party** |
| **MM-BIO-1-Wildlife Corridors, Linkages, and Critical Habitat-Land Acquisition** | Policy 7.6 within the document mentions a “rewilding” effort, which can include creating wildlife corridors. This Policy shall be expanded into a mitigation measure to better ensure the preservation of important areas associated with wildlife movement. The Applicant shall retain contiguous land parcels surrounding the Santa Clara River and Ventura River corridors. If land within the boundaries of the City is already protected, then acquisition shall expand past the City boundaries to aid in the preservation of the surrounding corridors. Land retained shall be protected in perpetuity from encroachment and development to ensure the preservation of the wildlife corridors. The mitigation lands shall be protected in perpetuity under a conservation easement dedicated to a local land conservancy or other appropriate entity that has been approved to hold and manage mitigation lands pursuant to Assembly Bill 1094 (2012). Assembly Bill 1094 amended Government Code, sections 65965-65968. Under Government Code, section 65967(c), the lead agency must exercise due diligence in reviewing the qualifications of a governmental entity, special district, or nonprofit organization to effectively manage and steward land, water, or natural resources on mitigation lands it approves. An appropriate endowment shall be provided for the long-term management of mitigation lands. A conservation | Prior to Project activities | City of Ventura /Applicant |

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| | easement and endowment funds shall be fully acquired, established, transferred, or otherwise executed prior to implementing Project-related ground disturbing activities and prior to the City's issuance of grading permits. | | |
| **MM-BIO-2-LSAA-Notification** | A BIO-Measure shall be added to the City's MMRP table, which states that Projects tiered from the DEIR, that have the potential to impact streams or associated communities, shall 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 shall determine whether a LSA Agreement is required prior to conducting the proposed activities. A notification package for a LSA may be obtained by accessing CDFW's web site at https://www.wildlife.ca.gov/conservation/lsa (CDFWf 2025).<br><br>If necessary, 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 of the Lead Agency for the Project. To minimize additional requirements by CDFW pursuant to section 1600 *et seq.* and/or under CEQA, the CEQA document should fully identify the potential impacts to streams or riparian resources and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the LSA Agreement. | Prior to Project activities | City of Moorpark /Applicant |

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| **MM-BIO-9-Monarch-** | CDFW recommends the DEIR require future Project proponents to retain a qualified biologist to assess the future development sites for monarch presence and overwintering habitat. A qualified biologist should survey any eucalyptus groves and other trees within the Project site that are suitable for overwintering monarchs. A qualified biologist should conduct multiple surveys for overwintering monarchs where potential overwintering habitat has been identified. Monitoring should be done as frequently as possible during the overwintering season (typically September 15 through March 11) to capture changing distributions through the season and in response to storm events. | Prior to/ During Project activities | City of Ventura /Applicant |
| **MM-BIO-4-Monarch** | If future development sites support an overwintering habitat/population of monarchs, CDFW recommends the DEIR require future project proponents to protect, manage, enhance, and restore potential overwintering habitat. The City should require future project proponents to prepare a long-term Monarch Butterfly Overwintering Habitat Management Plan in consultation with a qualified biologist. A Monarch Butterfly Overwintering Habitat Management Plan should be submitted to the City. At a minimum, the Monarch Butterfly Overwintering Habitat Management Plan should include:<br><br>• Protect: Trees should not be removed in overwintering groves unless a tree poses a safety risk. The critical root zone (CRZ) of trees that are not targeted for removal should be protected. Impacts to a tree's CRZ could result in injury or mortality of the tree causing additional loss of trees and canopy. Shrubs should not be removed in | Prior to Project activities | City of Ventura /Applicant |

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| | overwintering groves. Shrubs should be maintained to provide a buffer to preserve the microclimate conditions of the overwinter habitat.<br>• Manage: Management activities, such as tree trimming and mowing, should be conducted in groves from March 15 through September 15 outside of the estimated timeframe when monarchs are likely present on the southern California coast.<br>• Enhance: Enhance native, insecticide-free nectar sources by planting fall/winter blooming forbs or shrubs within overwintering groves<br>• Restore: Any trees removed as part of the project should be replaced with trees at no less than 2:1. Native insecticide-free trees should be planted such as Monterey pine (*Pinus radiata*), Monterey cypress (*Cupressus macrocarpa*), coast redwood (*Sequoia sempervirens*), coast live oak (*Quercus agrifolia*), Douglas fir (*Pseudotsuga menzesii*), Torrey pine (*Pinus torreyana*), western sycamore (*Platanus racemosa*), bishop pine (*Pinus radiata*) and others, as appropriate for location.<br>• Pesticides: Use of pesticides should be avoided, particularly when monarchs may be present. If pesticides are used, applications should be conducted from March 15 through September 15, when possible. Herbicide should not be applied on blooming flowers. Herbicide should be applied during young plant phases, when plants are more responsive to treatment, and when monarchs and other pollinators are less likely to be on the plants. Whenever possible, targeted application herbicide methods should be used, large-scale broadcast applications should be avoided, and precautions shall be taken to limit off-site movement of herbicides (e.g., drift from wind and discharge from surface water flows). Neonicotinoids or other systemic insecticides, including coated seeds, should not be used | | |

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| | any time of the year in monarch habitat due to their ecosystem persistence, systemic nature, and toxicity. Soil fumigants should not be used. Non-chemical weed control techniques should be used when possible.<br>• Tropical milkweed and pathogens: Non-native tropical milkweed should not be planted in order to minimize the spread of the pathogen *Ophryocystis elektroscirrha* (OE), and to encourage natural monarch migration. OE can build up on tropical milkweed because these plants are evergreen, and they do not die back in the winter. OE can be debilitating and/or lethal to monarchs. If possible, tropical milkweed should be removed and replaced with native, insecticide-free nectar plants suitable for the location | | |
| **MM-BIO-5-Monarch** | If future development sites do not support overwintering habitat, CDFW recommends the DEIR require future project proponents to avoid and minimize impacts on monarch butterflies by enhancing native, insecticide-free nectar sources; avoid planting additional tropical milkweeds; and avoid using pesticides, insecticides, and soil fumigants. | Prior to Project activities | City of Ventura /Applicant |
| **REC-1-Avoidance** | CDFW recommends Projects that are tiered off of the DEIR do not result in conversion of critical habitat, sensitive habitat, corridors/linkages, or open space into developed areas. Likewise, Projects tiered off the DEIR should avoid blocking or further encroaching into wildlife corridors, linkages, critical habitat, and open spaces. Encroachment onto sensitive habitats/open space creates an abrupt transition between two different land uses. Encroachment onto sensitive habitats/open space could affect environmental and biological conditions and increase the magnitude of edge effects on biological resources. | Prior to Project activities | City of Ventura /Applicant |

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| **REC-2- Analysis of Impacts to Corridors, Linkages, Open Spaces, and Critical Habitat** | CDFW recommends that all future Projects tiered off the DEIR should conduct specific studies to understand how land use changes and/or development will affect the Ventura River and Santa Clara River corridors. CDFW recommends all future Projects analyze whether they would impact wildlife corridors and essential connectivity blocks within the entirety of the Project area. Impacts include but are not limited to:<br><br>a) Direct impacts to, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas, due to habitat loss (acreage lost) and fragmentation, narrowing of a wildlife corridor (acreage lost), introduction of barriers to wildlife movement; and<br>b) Indirect impacts from increased noise, light, and human activity<br><br>Likewise, the analysis should include a discussion on, but not limited to:<br><br>c) An assessment on areas that would most benefit acquisition and preservation, enhancement of existing habitat, and/or the installation of wildlife crossings and structures with consideration to past, present, and future Projects.<br><br>Likewise, all future Projects tiered off the DEIR should conduct specific studies to understand how land use changes and/or development will affect critical habitats and open spaces. Impacts include but are not limited to:<br><br>a) Direct impacts to critical habitats and open spaces due to: access to undisturbed habitats in adjacent areas, habitat loss (acreage lost) and fragmentation, loss of | Prior to Project activities | City of Ventura /Applicant |

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| | nesting/roosting habitat, loss of foraging habitat; and<br>b) Indirect impacts from increased noise, light, and human activity.<br><br>Likewise, the analysis should include a discussion on, but not limited to:<br><br>c) An assessment on areas that would be most beneficial for protection in perpetuity for species with consideration to past, present, and future Projects. | | |
| **REC-3- Wildlife Corridors- Datasets** | Data sets to be considered within the analyses of Projects tiered from the DEIR should include but should not be limited to: Missing Linkages in California's landscape California Natural Diversity Database (CNDDB) layer (ds420), South Coast Missing Linkages (ds419), and Essential Connectivity Areas (ds620). Based on these datasets, the Projects should identify areas of possible impact. The Projects should also consider the South Coast Missing Linkages projected "least cost" linkage designs for the South Coast Ecoregion (South Coast Wildlands 2008 & Penrod 2006). Subsequent Projects should also review CDFW's Priority Wildlife Movement Barrier locations report (CDFWe 2020) and National Park Service's (NPS) collar data relating to mountain lion. | Prior to/ During Project activities | City of Ventura /Applicant |
| **REC-4- No Net Loss of Habitats and Open Space** | There should be no net loss of sensitive habitats/open space. CDFW recommends the DEIR provide measures where any future development facilitated by the Project mitigates (avoids first if feasible) for project-level impacts on sensitive habitats/open space not previously identified in the DEIR. CDFW recommends the DEIR provide a measure where any future development facilitated by the Project establishes unobstructed vegetated buffers and setbacks. The DEIR should provide standards for an effective | Prior to/ During Project activities | City of Ventura /Applicant |

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| | buffer and setback; however, the buffer and setback distance should be increased at a project-level as needed. | | |
| **REC-5-Wildlife Corridors-Mitigation** | If impacts to movement corridors or natural habitats occur, future Projects should also include plans to implement or help fund wildlife crossing structures or passages. Future Projects should provide minimum criterion for design features, dimensions, and locations of potential crossings and associated fencing. | | |
| **REC-6-Avoidance of Streams and Wetlands** | Projects tiered from the DEIR should avoid impacts to streams, wetlands and associated natural communities. | Prior to/During Project activities | City of Ventura /Applicant |
| **REC-7-Clarification on Open Space** | CDFW recommends the City clarify open space areas within the proposed land use map. Within Figure ES-1 (Proposed General Plan Land Use Map), the hillside area and Taylor Ranch within the City's Sphere of Influence (SOI) are not provided a designation. Further in the document within Figure 4.4-3 (Regional Wildlife Corridors), these areas are depicted as open space, but there are some non-designated areas within the hillside open space area. CDFW recommends providing a new figure which shows the proposed land use for these areas and a discussion of potential changes to the land use designation from the 2005 plan. | Prior to Project activities | City of Ventura /Applicant |
| **REC-8-Preservation of Space** | CDFW recommends the remaining open spaces be protected in perpetuity, especially those that aid permeability for wildlife, those that are associated with riparian communities, and those that include habitat important to special status wildlife and plant species. This includes but is not limited to, the Hillside open space area and the Taylor Ranch area. | Prior to/During Project activities | City of Ventura /Applicant |

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| **REC-9-Crotch's Bumble Bee** | CDFW Recommends modifying BIO-8 to include the underlined language and remove language with strikethrough:<br><br>The City shall add the following as Implementation Program 7.3.2 under Policy 7.3 of the General Plan Parks and Open Space Element: For construction activities located in ~~vacant or undeveloped~~ areas containing open grasslands, shrublands, or chaparral, a habitat assessment for Crotch's bumblebee shall be performed by a qualified biologist knowledgeable and experienced with Crotch's bumblebee (with the appropriate handling permits to conduct focused surveys) and the habitat in which they occur. Special attention will be given to vacant and undeveloped areas with suitable nesting/foraging habitat. If the biologist determines that suitable habitat for Crotch's bumblebee is present, a focused survey shall be performed during the species' active flight period for Crotch's bumblebee and peak blooming period of nectar and pollen sources ~~(May 1 through July 31)~~ (April 1-August 31). The biologist will consider survey materials such as CDFW's Survey Considerations for California Endangered Species Act Candidate Bumble Bee Species. The Crotch's bumblebee survey shall be conducted on foot and shall encompass the entirety of a project site and focus on areas that allow for the highest probability of detection, such as high abundance nectar or pollen sources and rodent burrows that may be used for breeding and nesting. If Crotch's bumblebee is determined to be present, the project proponent shall map the locations of the observed bumblebee, | Prior to/During Project activities | City of Ventura /Applicant |

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| | areas of abundant nectar or pollen sources, and any active nesting sites. A report summarizing the results of the habitat assessment and focused survey (if required) shall be prepared by the qualified biologist and shall be submitted to the City prior to the commencement of construction activities. Further, consultation with the CDFW will be necessary in the event Crotch's bumblebee was observed within a project site and an Incidental Take Permit, in accordance with the California Endangered Species Act, may be required prior to initiating any ground disturbance on the site. | | |
| **REC-10- Nesting Birds** | CDFW Recommends modifying BIO-7 to include the underlined language and remove language with strikethrough:<br><br>For all future development facilitated by the Ventura General Plan, construction activities initiated during the bird nesting season (February 1 – September 15, and as early as January 1 for some raptors), involving removal of vegetation (e.g. trees and shrubs), abandoned structures, or other nesting bird habitat, a pre-construction nesting bird survey shall be conducted no more than 5 days prior to initiation of ground disturbance and vegetation removal. The nesting bird preconstruction survey shall be conducted on foot and shall include a buffer around the construction site at a distance determined by a qualified biologist, including staging and storage areas. The minimum survey radii surrounding the work area shall be the following: 250 feet for common passerine species, ~~for non-raptors~~ 300 feet for special status passerine species, and 1,000 feet for raptors, but shall be adjusted as necessary by a qualified biologist. The survey shall be conducted by a qualified biologist familiar with the identification of avian species known to occur in the Ventura region. If construction lapses for ~~seven~~ five days or longer, the qualified biologist shall conduct another focused survey before project activities are reinitiated. If nests are found, an avoidance buffer shall be determined by the biologist dependent upon the species, the | Prior to Project activities | City of Ventura /Applicant |

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| | proposed work activity, existing disturbances associated with land uses outside of the site. The qualified biologist shall observe the active nest to establish a behavioral baseline of the adults and nestlings, if present. The qualified biologist shall continuously monitor the active nests to detect signs of disturbance and behavioral change as a result of construction impacts, such as noise, vibration, odors, or worker/equipment motion. If signs of disturbance and behavioral changes are observed, the qualified biologist shall require that construction causing those changes cease and may contact CDFW or USFWS for guidance. The buffer shall be demarcated by the biologist with bright orange construction fencing, flagging, construction lathe, or other means to demarcate the boundary. All construction personnel shall be notified of the buffer zone as an “Ecologically Sensitive Area” and to avoid entering the buffer zone during the nesting season. No ground disturbing activities shall occur within the buffer until the biologist has confirmed that breeding/nesting is completed and the young have fledged the nest. Encroachment into the buffer shall occur only at the discretion of the qualified biologist on the basis that the encroachment will not be detrimental to an active nest. A report summarizing the pre-construction survey(s) shall be prepared by a qualified biologist and shall be submitted to the City prior to the commencement of construction activities. Project site plans shall include a statement acknowledging compliance with the federal MBTA and California Fish and Game Code that includes avoidance of active bird nests and identification of Best Management Practices to avoid impacts to active nests, including checking for nests prior to construction activities during February 1 to September 15, and what to do if an active nest is found so that the nest is not inadvertently impacted during grading or construction activities. | | |

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| **REC-11-Language Modifications** | CDFW Recommends modifying BIO-5 to include the underlined language and remove language with strikethrough:<br><br>For all work occurring in areas where endangered/threatened species may be present and are at risk of entering the project site during construction, the applicant shall install exclusion fencing along the project boundaries prior to start of construction (including staging and mobilization). The placement of the fence shall be at the discretion of the CDFW/USFWS-approved biologist. This fence shall consist of solid silt fencing placed at a minimum of three feet above grade and two feet below grade and shall be attached to wooden stakes placed at intervals of not more than five feet. The applicant shall inspect the fence ~~weekly~~ daily and following rain events and high wind events and shall be maintained in good working condition until all construction activities are complete. | Prior to Project activities | City of Ventura /Applicant |
| **REC-12-CNDDB** | CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database [i.e., CNDDB] which may be used to make subsequent or supplemental environmental determinations [Pub. Resources Code, § 21003, subd. (e)]. Information on special status species should be submitted to the CNDDB by completing and submitting CNDDB Field Survey Forms (CDFWk 2023). Information on special status native plant populations and sensitive natural communities, the Combined Rapid Assessment and Relevé Form should be completed and submitted to CDFW's Vegetation Classification and Mapping Program (CDFWl 2023). | Prior to/ During Project activities | City of Ventura /Applicant |
| **REC-13-Fuel Modification** | If Projects tiered off the DEIR include fuel modification, CDFW recommends that the final environmental documents include avoidance and mitigation measures for any fuel modification activities conducted within and adjacent to the Project area. A weed management plan should be developed for all areas adjacent to open space that will be subject to fuel modification disturbance. CDFW also recommends that any irrigation proposed | Prior to Project activities | City of Ventura /Applicant |

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| | in fuel modification zones do not allow for the introduction of invasive Argentine ants. Monitoring should also include parameters to identify possible introduction of Argentine ants. | | |
| **REC-14- Weed Management** | Weed management plans should be developed for Projects tiered off the DEIR for all Project areas and implemented both during, and for at least 3 yeas post-Project. Non-native weeds including noxious weeds (as listed by the California Invasive Plant Council) (CALIPC 2022) should be prevented from becoming established to control the local spread if invasive plants, both during and after construction. Site visits should be conducted monthly and weekly during the rainy season. The Project areas should be monitored via mapping for new introductions and expansions of non-native weeds. Annual threshold limits, eradication targets, and monitoring should be included in this plan. Monitoring for spread of invasive weeds to adjacent lands should also be included. | Prior to Project activities | City of Ventura /Applicant |
| **REC-15- In-lieu Fees** | In-lieu fees can be considered a type of deferred mitigation. Future projects should utilize alternative methods of mitigation such as restoration, enhancement, and acquisition of lands to be protected in perpetuity. | Prior to Project activities | City of Ventura /Applicant |
| **REC-16- Invasive Pests and Pathogens** | Any future Projects that remove vegetation that could host pest species should work with the certified arborist to identify all trees and species for removal from the project site and inspect those trees for contagious tree diseases including but not limited to: thousand canker fungus (TCD 2021), polyphagous shot hole borer (UCANR 2018), and goldspotted oak borer (UCIPM 2021). If invasive pests and/or diseases are detected, the subsequent projects should provide an infectious tree disease management plan and describe how it will be implemented to avoid significant impacts under CEQA. To avoid the spread of infectious tree diseases, diseased trees should not be transported from the project site(s) without first being treated using best available management practices relevant for each tree disease observed. | Prior to Project activities | City of Ventura /Applicant |

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| **REC-17-MMRP** | Per Public Resources Code section 21081.6(a)(1), CDFW has provided the District with a summary of our suggested mitigation measures and recommendations in the form of an attached Draft Mitigation and Monitoring Reporting Plan. A final MMRP shall reflect results following additional plant and wildlife surveys and the Project's final on and/or off-site mitigation plans. | Prior to Project activities | City of Ventura /Applicant |