# Bridge Road Bridge Rehabilitation and Scour Mitigation Project

# **Initial Study/Mitigated Negative Declaration**

## State Clearinghouse #2022060410

#### Prepared for:

Ventura County Department of Public Works 800 South Victoria Avenue, Ventura, CA 93009



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# **Table of Contents**

I.	INTRODUCTION	
	3. Intent and Scope of this Document	
	4. Organization of this Document	
	5. Terminology	5
II.	PROJECT DESCRIPTION	
11.	1. Project Title	
	Lead Agency Name and Address	
	3. Contact Person	
	4. Project Applicant and Sponsor	
	5. Project Location	
	6. General Plan Designation	
	7. Zoning	6
	8. Surrounding Land Uses and Setting	6
	9. Project Description	8
	10. Other Public Agencies Whose Approval is Required	11
III.	ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED	12
IV.	DETERMINATION	13
IV.	DETERMINATION	
V.	EVALUATION OF ENVIRONMENTAL IMPACTS	14
	1. Aesthetics	
	Agriculture and Forestry Resources	
	3. Air Quality	
	4. Biological Resources	
	5. Cultural Resources	
	6. Energy	
	7. Geology and Soils	68
	8. Greenhouse Gas Emissions	
	9. Hazards and Hazardous Materials	
	10. Hydrology and Water Quality11. Land Use and Planning	٥٠٠٠
	12. Mineral Resources	
	12. Willieldi Nesoulces	
	13 Noise	
	13. Noise	
	14. Population and Housing	96
	14. Population and Housing	96 97
	<ul><li>14. Population and Housing</li><li>15. Public Services</li><li>16. Recreation</li></ul>	96 97
	<ul><li>14. Population and Housing.</li><li>15. Public Services.</li><li>16. Recreation.</li><li>17. Transportation.</li></ul>	96 97 98
	<ul><li>14. Population and Housing.</li><li>15. Public Services.</li><li>16. Recreation.</li><li>17. Transportation.</li></ul>	96 98 99
	14. Population and Housing	
	14. Population and Housing	

VII.	Mitigation Monitoring or Reporting Plan (MMRP)	118
VIII.	REFERENCES	23
List of Figu	res	
	Location	
•	ocation	
•	ootprint	
•		
	on Communities and Cover Classes	
	on Potential California Department of Fish and Wildlife Jurisdiction	
•	on Potential United States Army Corps of Engineers and Regional Water Qued Incident Control of the Control of t	•
	ed Map	
List of Tabl	es	
•	ry Permits and Agency Approval Needed	
	l Construction Emissions of Criteria Air Pollutants Federal Nonattainment Pollutants	
	risdictional Features Delineated in the Biological Study Area	
	RWQCB Jurisdictional Features Delineated in the Biological Study Area	
	CDFW Jurisdictional Features Delineated in the Biological Study Area	
	atus Natural Communities with Potential to be in the Biological Study Area	
•	atus Plants with Potential to be in the Biological Study Area	
Table 9. Special-S	tatus Wildlife with Potential to be in the Biological Study Area	42
Table 10 Permane	ent Impacts on Sensitive Natural Communities	51
•	ary Impacts on Jurisdictional Features in the BSA	
	ed Construction GHG Emissions	
•	Noise Thresholds	
	Response to Levels of Groundborne Vibration	
	oorne Vibration Damage Potential Criteria	
	ction Equipment-Related Groundborne Vibration	
i abie 17 Projects	within Two Miles	110

## **List of Acronyms**

AB Assembly Bill

ADL Aerially deposited lead
amsl Above mean sea level
APE Area of Potential Effects
API Unique well identifier
APN Accessor Parcel Number
ARB Air Resources Board

ASR Archaeological Survey Report
AQMP Air Quality Management Plan

bgs Below ground surface
BIR Bridge Inspection Report
BMP Best Management Practice

BSA Biological study area

CalGEM California Geologic Energy Management Division

Caltrans California Department of Transportation

CARB California Air Resources Board CCR California Code of Regulations

CDFW California Department of Fish and Wildlife
CDOC California Department of Conservation
CEQA California Environmental Quality Act
CNDDB California Natural Diversity Database

CNPS California Native Plant Society

CO Carbon monoxide CO<sub>2</sub> Carbon dioxide

CO<sub>2</sub>e Carbon dioxide equivalent

County County of Ventura Department of Public Works
CRHR California Register of Historical Resources

dB decibels

CWA Clean Water Act

EDR Environmental Data Resources
ESL Environmental Screening Levels

FEMA Federal Emergency Management Agency

FIRM Flood Insurance Rate Map

FMMP Farmland Mapping and Monitoring Program

General Plan Ventura County 2040 General Plan

GHG Greenhouse gas

HCP Habitat Conservation Plan

IS/MND Initial Study/Mitigated Negative Declaration

Leg Equivalent noise level

LOS Level of Service

mg/L Milligrams per liter

MRZ Mineral Resource Zone

NOA Notice of Availability

NOI Notice of Intent

NO<sub>x</sub> Nitrogen oxides

Bridge Road Bridge Rehabilitation and Scour Mitigation Project

NPDES National Pollutant Discharge Elimination System

NRCS Natural Resources Conservation Service
NRHP National Register of Historic Places

O<sub>3</sub> Ozone

OCP Organochlorine Pesticides
OHWM Ordinary High Water Mark

PM Particulate matter
ppd Pounds per day
PPV Peak particle velocity
PRC Public Resource Code

Project Bridge Road Bridge Rehabilitation and Scour Mitigation Project

REC Recognized Environmental Condition

ROC Reactive organic compounds

ROG Reactive organic gas

ROW Right-of-way

RWQCB Regional Water Quality Control Board

SCCAB South Central Coast Air Basin

SCAG Southern California Association of Government SCAQMD South Coast Air Quality Management District SMARA Surface Mining and Reclamation Act of 1975

SR-150 State Route 150

STLC Soluble Threshold Limit Concentration TCE Temporary construction easement

TCLP Toxicity Characteristic Leaching Procedure

U.S. United States

USACE United States Army Corps of Engineers
USDA United States Department of Agriculture
USFWS United States Fish and Wildlife Service

VCAPCD Ventura County Air Pollution Control District
VCWPD Ventura County Watershed Protection District

VMT Vehicles miles traveled

#### I. INTRODUCTION

The Ventura County Department of Public Works (County) has prepared this Initial Study/Mitigated Negative Declaration (IS/MND) to provide the public, responsible agencies, and trustee agencies with information about the potential environmental effects of the proposed Bridge Road Bridge Rehabilitation and Scour Project (project). This document was prepared pursuant to the requirements of the California Environmental Quality Act (CEQA) of 1970 (as amended) and the State CEQA Guidelines (14 California Code of Regulations 15000 et seq.).

#### 1. Introduction

The County, in cooperation with the California Department of Transportation (Caltrans), proposes to conduct minor rehabilitation of the existing single-span bridge at Bridge Road over Santa Paula Creek (creek) (Bridge #52C-0053) and conduct scour mitigation within the floodplain boundary to protect the bridge. The project area is located approximately 150 feet east of State Route 150 (SR-150) and approximately two miles north of the City of Santa Paula (Santa Paula) in the County of Ventura (Ventura County) (see **Figure 1**, **Figure 2**, and **Figure 3**). The project is listed in the Southern California Association of Government's (SCAG's) 2019 Federal Transportation Improvement Program.

## 2. Legal Authority and Findings

The County is the Lead Agency pursuant to CEQA. The County has prepared this IS/MND in accordance with the Guidelines for the Implementation of CEQA (CEQA Guidelines) (California Code of Regulations [CCR], Title 14, Chapter 3, Sections 15000 et seq.). Although consultants assisted in the preparation of this IS/MND, all analysis, conclusions, findings, and determinations presented in the IS represent the County, acting as the Lead Agency under CEQA. In accordance with the provisions of CEQA and the State and local CEQA Guidelines, the County, as the Lead Agency, is responsible for reviewing the potential environmental effects, and after consideration, approving or denying the project.

## 3. Intent and Scope of this Document

This IS/MND has been prepared in accordance with CEQA, under which the Bridge Road Bridge Rehabilitation and Scour Project (project) constitutes a "project." The County, as the lead agency under CEQA, will consider the potential environmental impacts of project activities when it considers whether to approve the project. This IS/MND is an informational document to be used in the local planning and decision-making process. The IS/MND does not recommend approval or denial of the project.

The IS/MND describes the project and its environmental setting, including the project area's existing conditions and applicable regulatory requirements. This IS/MND also evaluates potential environmental impacts of the project on the following resources:

Aesthetics Gre
Agricultural and Forestry Haz
Air Quality Hyd
Biological Resources Lan
Cultural Resources Min

Energy

Geology and Soils

Greenhouse Gas Emissions Hazards and Hazardous Hydrology and Water Land Use and Planning Mineral Resources

Noise

Population and Housing

1

Public Services Recreation Transportation

Tribal Cultural Resources Utilities and Service Systems

Wildfire

Mandatory Findings of Significance

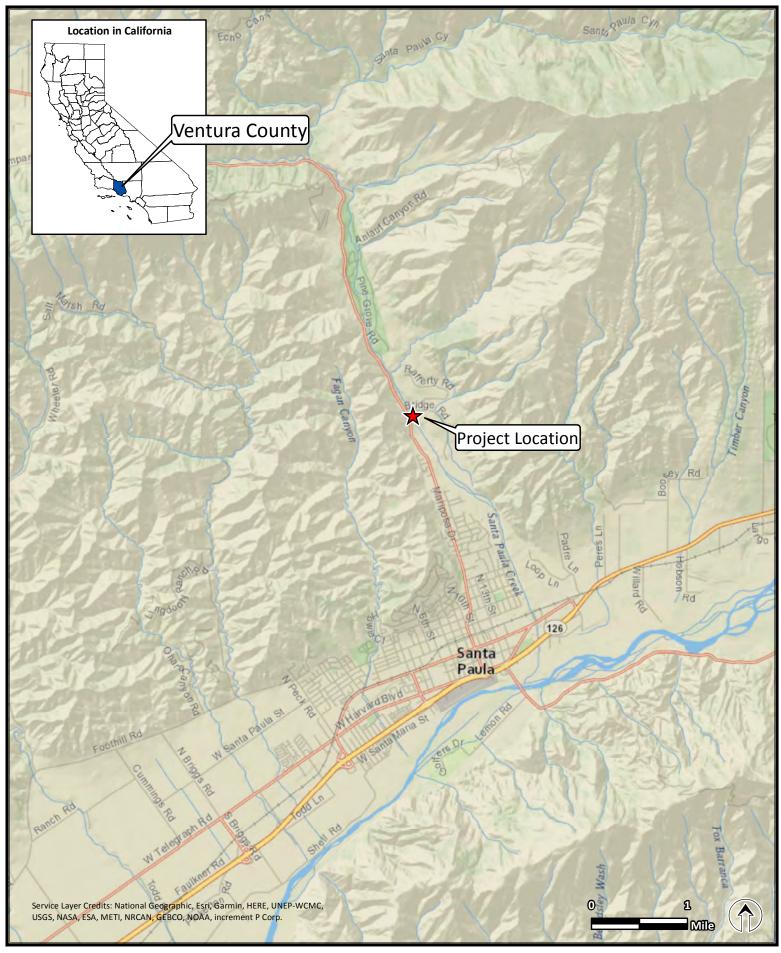
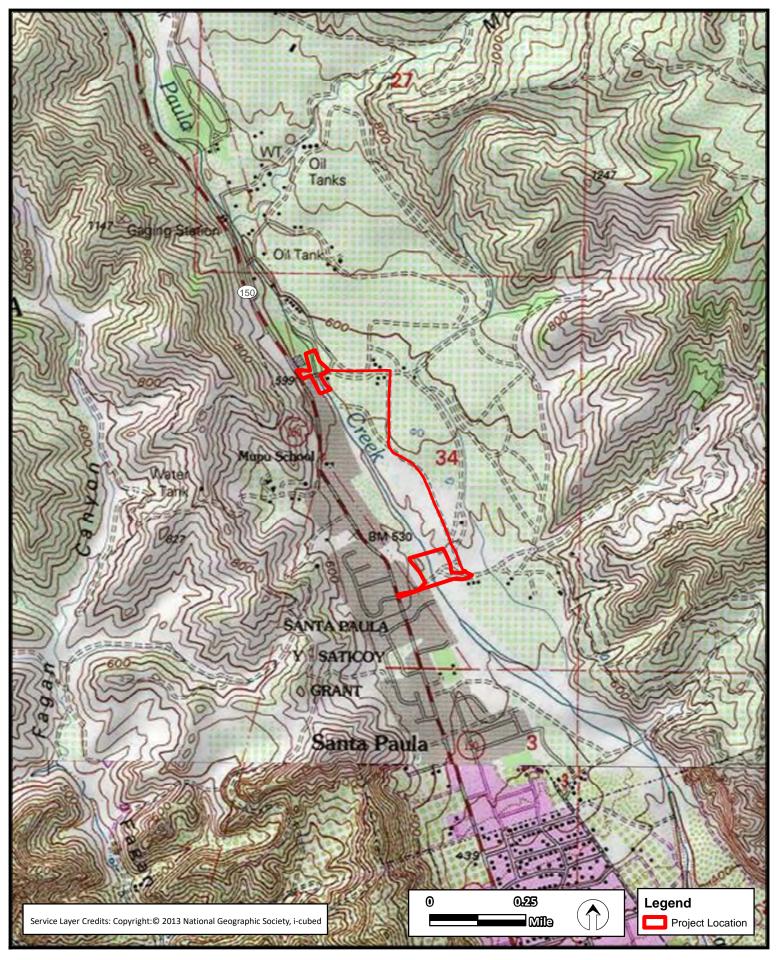




FIGURE 1. REGIONAL LOCATION Bridge Road Bridge Rehabilitation and Scour Mitigation Project





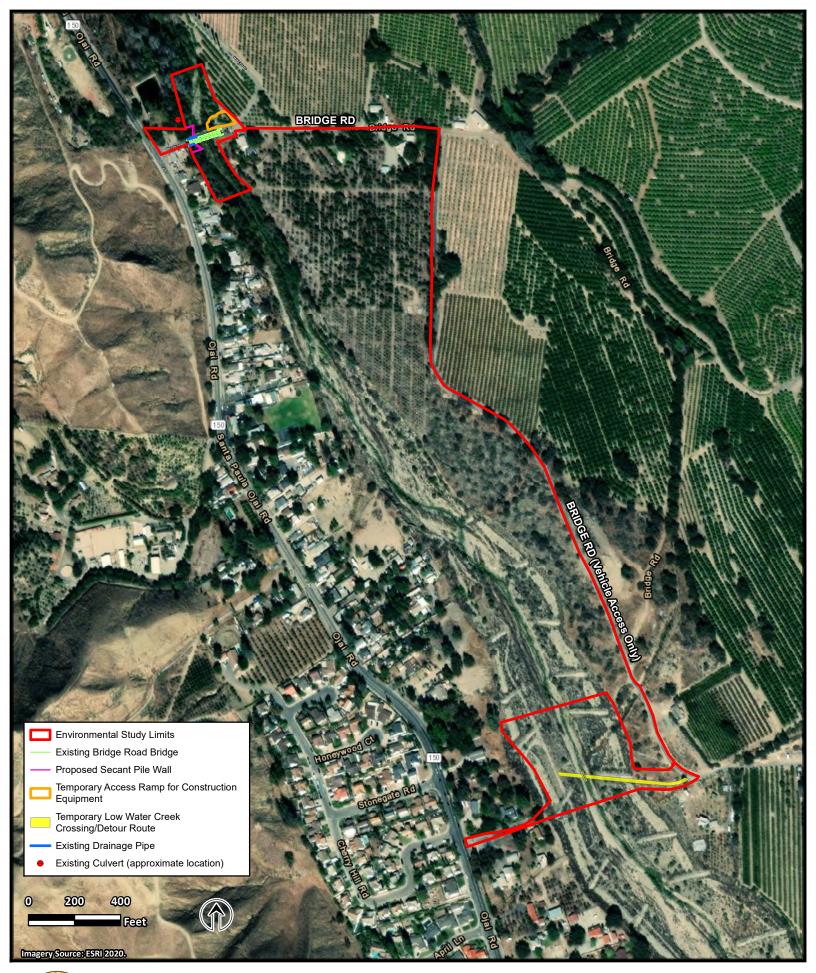




Figure 3. PROJECT FOOTPRINT Bridge Road Bridge Rehabilitation and Scour Mitigation Project

## 4. Organization of this Document

This IS/MND contains the following sections:

<u>Section I, Introduction</u>: This section provides an overview of the project and the CEQA environmental documentation process.

<u>Section II, Project Description</u>: This section provides a description of the project location, project background, and project components.

<u>Section III, Environmental Factors Potentially Affected</u>: This section presents the environmental checklist used to evaluate the project's potential environmental effects. The checklist is based on the information provided in Appendix G of the state's CEQA Guidelines and the County's CEQA Guidelines.

<u>Section IV, Determination</u>: This section provides the recommended environmental documentation for the project.

<u>Section V, Evaluation of Environmental Impacts</u>: This section provides a detailed discussion of the environmental factors that could be affected by this project. Any mitigation measures that would be implemented to ensure that potential adverse impacts of the project would be reduced to a less-than-significant level are also included in this section.

<u>Section VI, References:</u> This section provides a list of reference materials used during the preparation of this report.

## 5. Terminology

This IS/MND uses the following terminology to describe the environmental effects of the project:

- A finding of no impact is made when the analysis concludes that the project would not affect the particular environmental resource or issue.
- An impact is considered less than significant if the analysis concludes that there would be no substantial adverse change in the environment and that no mitigation is needed.
- An impact is considered significant if it results in a substantial adverse change in the physical
  conditions of the environment. Significant impacts are identified by using specific significance criteria
  as a basis of evaluation. Mitigation measures are identified to reduce these potential effects on the
  environment.
- This IS/MND identifies particular mitigation measures that are intended to reduce project impacts.
   The State CEQA Guidelines [Section 14 of the California Code of Regulations (CCR) 15370] define mitigation as:
  - Avoiding the impact altogether by not taking a certain action or parts of an action;
  - Minimizing impacts by limiting the degree or magnitude of the action and its implementation;
  - Rectifying the impact by repairing, rehabilitating, or restoring the impacted environment;
  - Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action; and
  - o Compensating for the impact by replacing or providing substitute resources or environments.

#### II. PROJECT DESCRIPTION

## 1. Project Title

Bridge Road Bridge Rehabilitation and Scour Mitigation Project

## 2. Lead Agency Name and Address

Ventura County Department of Public Works 800 South Victoria Avenue Ventura, CA 93009

#### 3. Contact Person

Christopher Solis christopher.solis@ventura.org (805) 654-2054

## 4. Project Applicant and Sponsor

Ventura County Department of Public Works 800 South Victoria Avenue Ventura, CA 93009

## 5. Project Location

The project is located on Bridge Road, within a rural portion of Ventura County, California. The project is adjacent to SR-150 and approximately two miles north of the city of Santa Paula.

## 6. General Plan Designation

The Ventura County 2040 General Plan (General Plan) designation for land in the project area is Agriculture (AG) (Ventura County, 2019). The General Plan describes the designation Agriculture as being applied to lands that are suitable for the cultivation of crops and the raising of livestock.

## 7. Zoning

The current zoning designation for the project area is Agricultural Exclusive, 40-acre minimum parcel size (AE-40) (Ventura County, n.d). The County's Non-Coastal Zoning Ordinance describes the purpose of Agricultural Exclusive zoning as to preserve and protect commercial agricultural lands as a limited and irreplaceable resource, to preserve and maintain agriculture as a major industry in Ventura County, and to protect these areas from the encroachment of nonrelated uses which, by their nature, would have detrimental effects upon the agriculture industry (Ventura County, 2021).

## 8. Surrounding Land Uses and Setting

The project area is located in an area characterized primarily by agricultural uses (see **Figure 4**). East of the project area the land is designated for Low and Very Low-Density Residential, and Open Space land use. In addition, south of the project area the land use designation is Open Space. North of the project area land is designated for agricultural use.

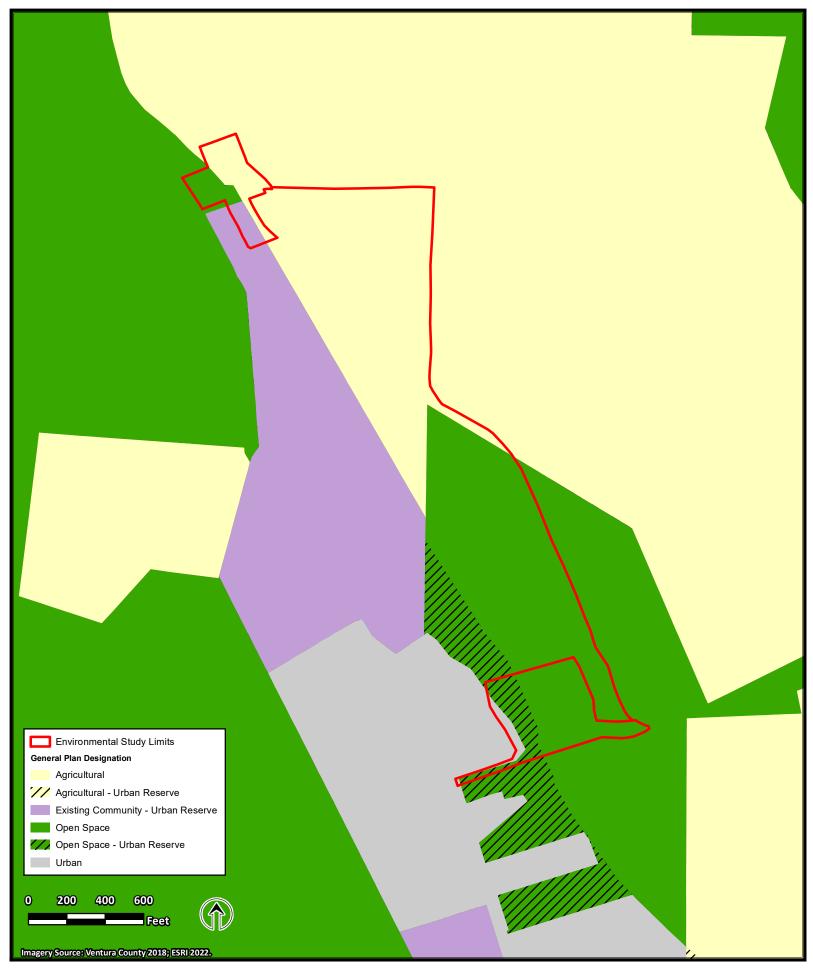




FIGURE 4. LAND USE Bridge Road Bridge Rehabilitation and Scour Mitigation Project

## 9. Project Description

#### **Project Purpose**

The purpose of the project is to: 1) rehabilitate the bridge (Bridge #52C-0053) to correct deck geometry and repair minor defects; and 2) construct scour protection measures to protect the bank and existing bank protection from being undermined.

#### **Project Need**

The project is needed because the 2018 Bridge Inspection Report (BIR) noted several minor bridge defects that require correction including loose or missing washers/nuts and bolts on several bridge floor beams and a pipe support strap that in its current location prevents access to a panel point on one bridge truss. In addition, the 2018 BIR identified erosion issues within the stream channel that are undermining the bridge abutments. Specifically, a portion of the shotcrete is broken and undermined, and a portion of the shotcrete swale is undermined and shifting downward leaving a gap at the top of the face of the abutment.

#### **Existing Conditions**

The existing bridge is a single-lane steel truss bridge that is approximately 130 feet long and provides the only access route to approximately 12 properties located east of the creek. The bridge was constructed in 1911 and moved to its present location in 1941. The bridge is listed under the Caltrans Historical Significance listing as Category 2, which means it is eligible for the National Register of Historic Places (NRHP).

A BIR was completed in 1999, resulting in the closure of the bridge, which was deemed scour critical due to the complete undermining of the westerly bridge abutment caused by erosion. Subsequently, a repair project was completed in June 1999 to stabilize the abutment. In 2003, a project was completed to address various defects in the bridge including repairing timber blocks, resetting floor deck anchors, replacing the concrete backwalls at the bridge's east end, and replacing bolts. In 2010, the entire deteriorated timber deck and asphalt concrete pavement surface were removed and replaced. Existing timber stringers were also replaced with new stringers added.

In 2012, Caltrans performed an inspection of the bridge that indicated it was Structurally Deficient with a sufficiency rating of five out of 100 due to bridge geometry and safety. The issues with the bridge included the; bridge railings and approach guardrails not meeting the standard; the gunite slope protection on the upstream portion of the west abutment was degraded by scour, evidence that foundations on the downstream portion of the west abutment had been undermined by scour, and that the timber stringers were not capable of carrying the loads posted on the bridge. The project area is adjacent to agricultural and residential properties, including lands identified as agricultural resources by the California Department of Conservation's (CDOC) Farmland Mapping and Monitoring Program (FMMP). Lands identified in FMMP as Prime Farmland, Farmland of Local Importance, Unique Farmland, and Grazing Land are located directly adjacent to the project (California Department of Conservation, 2016).

#### **Proposed Project**

The project would include minor rehabilitation of the bridge deck and the construction of scour mitigation within the floodplain boundary to protect the bridge. Bridge rehabilitation would include the installation of wooden railroad ties on each end of the bridge deck to limit vehicles on the bridge to the existing single lane. In addition, the project would include minor repairs recommended in the 2018 BIR. These repairs

would consist of fixing approximately 10 deck bolts that are sticking up above the bridge deck surface; replacing a missing washer and nut on a 1-floor beam; tightening the bolts connecting the retrofit channels through the web of a 1-floor beam and relocating a pipe support strap on the bridge truss.

Scour mitigation would include the installation of cantilever secant pile walls to the existing slope protection and provide stability to the existing bridge abutment on the west side of the bridge. A secant pile wall is a continuous wall that would be constructed by drilling overlapping piles in sequence, with weak piles (generally made of a concrete or slurry mix) drilled into the existing ground and strong piles (made of stronger concrete strength with reinforcement cages) drilled in to overlap with the weak piles. The proposed wall would consist of a 6-foot by 4-foot cap beam buried under the existing creek bed, with a top elevation of 544 feet atop strong secant piles (5-foot diameter with a tip elevation of 507 feet) and weak piles (2-foot diameter with a tip elevation of 527 feet). The piles would be spaced at six feet on center. The fill behind the cap beam would consist of lightweight cellular concrete fill. Along the side slopes, the cantilever secant pile wall would consist of a cap beam (3.5-foot by 4-foot with a top elevation varying between 544 feet and 582 feet) topping strong secant pile walls (2.5-foot diameter with a tip elevation 27 feet below the cap beam) and weak piles (2-foot diameter with a tip elevation 23 feet below the top of the cap beam). The pile cap would be at grade with the existing embankment revetment. During construction, a trench would be excavated along the proposed alignment and then backfilled to the original grade. The wall alignment would follow the outline of the existing soil nail wall toe parallel to the creek bed. To prevent erosion from behind the existing slope protection, the wall alignment turns 90 degrees into the existing slope at the upstream and downstream locations. This design would minimize environmental impacts on the existing creek bed. The maximum depth of excavation within the creek would be up to 20 feet below the ground surface (bgs).

#### **Anticipated Construction Schedule and Methods**

Construction would be conducted over a 4-month period. Construction within the creek would be completed during the dry season between April 15 and October 15 when water flow within the creek would be lower. A temporary water diversion would be put in place to move creek flow away from construction activities within the creek bed. The soft bottom channel would be maintained. Following construction, the temporary diversion would be removed, and the native soil would be re-graded similar to pre-project contours. The project includes drilling to a maximum of 20 feet bgs. Groundwater levels are about the same level as the stream channel and groundwater should be anticipated for any excavations in the creek bottom. Therefore, construction of the secant pile wall would be expected to intercept groundwater, and dewatering is anticipated.

The following construction equipment would be used:

#### Clearing and Grubbing of the Project Area

- Cat 970F Loader
- F250 Crew Cab

### Construct Temporary Weather Crossing

- Cat 970F Loader
- Cat 349F Excavator

#### Grading for the Temporary Access Ramp

Cat 970F Loader

Bridge Road Bridge Rehabilitation and Scour Mitigation Project

- Cat 349F Excavator
- Peterbuilt 4000 Gallon Water truck
- Structure Excavation
- Cat 970F Loader
- Cat 349F Excavator
- Cat 345 Excavator

#### Drilling and Secant Pile Wall Construction

- Maxim Manitowoc 777 Crane
- Bauer BG 40 Drill Rig
- Forklift #7929
- Conco Pumping Schwing 31 Meter Conc Pump

#### **Backfill and Channel Restoration**

- Cat 970F Loader
- Cat 349F Excavator

Construction equipment required for this project would exceed the weight capacity of Bridge Road Bridge. Therefore, a temporary access road across Santa Paula Creek would be constructed at Fair Weather Crossing to allow construction vehicles access to the project area via Bridge Road. A culvert would be placed under the temporary crossing to maintain creek flows. In addition, a temporary ramp would be constructed on the northeast side of the bridge (Accessor Parcel Number [APN] 040-0-100-195) to allow construction equipment to enter the creek. The parcel is currently an active citrus orchard and approximately three citrus trees would be removed to construct the temporary access ramp. Following construction, the temporary crossing at Fair Weather Crossing and the temporary access ramp would be removed and the native soil would be re-graded similar to pre-project contours. During construction, vegetation within the creek would be removed.

#### Right of Way

The project would not require permanent right-of-way (ROW) acquisitions; however, Temporary Construction Easements (TCE) would be required from six adjacent private parcel (APNs 040-0-100-070, 040-0-120-250, 040-0-120-340, 040-0-130-310, 040-0-100-195, and 040-0-120-385). Additionally, permanent easements could be required from two private parcels (APNs 040-0-120-250 and 040-0-100-195), and permissible access could be required from six private parcels (APNs 040-0-120-250, 040-0-120-245, 040-0-120-335, 040-140-305, 040-0-120-265, and 040-0-120-250). Project construction is anticipated to occur over four months. During construction a temporary staging area would be utilized; however, the location would be determined during project design.

#### Utilities

A roadway drainage pipe is located approximately 75 feet upstream from the west side of the bridge and would be moved because runoff from the drain is contributing to erosion of the embankment. However, construction of the project would not require the relocation of telephone or electrical lines, and the utility lines suspended underneath the bridge would not be relocated.

#### Access

During the four month construction period, it is anticipated that Bridge Road would be partially closed

during working hours; however, the roadway would remain open to through-traffic during non-working hours to maintain continuous access for local residents. Access to private properties on the east side of Santa Paula Creek would be maintained via Fair Weather Crossing during partial bridge closures. Trees adjacent to the project area would not be removed during construction of the project; however, vegetation within the creek would be removed to allow for vehicle and equipment access.

## 10. Other Public Agencies Whose Approval is Required

The County is the CEQA lead agency for the proposed project. The discretionary and ministerial actions associated with the development of the project include, but are not limited to, the following listed in **Table 1**.

Table 1 Regulatory Permits and Agency Approval Needed

Agency	Permit
United States Army Corps of Engineers	Section 404 Nationwide Permit
Regional Water Quality Control Board	Section 401 Water Quality Certification
Regional Water Quality Control Board	National Pollutant Discharge Elimination System Permit
California Department of Fish and Wildlife	Section 1602 Streambed Alteration Agreement

## III. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist in the following Evaluation of Environmental Impacts section.

☐ Aesthetics	☐ Greenhouse Gas Emissions	☐ Public Services
☐ Agriculture & Forestry Resources	☐ Hazards & Hazardous Materials	Recreation
☐ Air Quality	☐ Hydrology & Water Quality	☐ Transportation
☐ Biological Resources	☐ Land Use & Planning	☐ Tribal Cultural Resources
☐ Cultural Resources	☐ Mineral Resources	☐ Utilities & Service Systems
☐ Energy	☐ Noise	☐ Wildfire
☐ Geology & Soils	☐ Population & Housing	☐ Mandatory Findings of Significance

#### IV. DETERMINATION

On the basis of this initial evaluation:

The conclusions and recommendations contained herein are professional opinions derived in accordance with current standards of professional practice. They are based on a review of the County's Environmental Resource Maps, the other sources of information listed in the file, and the comments received, conversations with knowledgeable individuals; the preparer's personal knowledge of the area; and, where necessary, a visit to the site. For further information, see the environmental background information contained in the permanent file on this project.

	I find that the Project COULD NOT have a significant effect on	the environment, and a NEGATIVE
$\boxtimes$	DECLARATION will be prepared.  I find that although the Project could have a significant effect be a significant effect in this case because revisions in the Proto by the Project proponent. A MITIGATED NEGATIVE DECLAR	oject have been made by or agreed
	I find that the Project MAY have a significant effect on the envi IMPACT REPORT is required.	···
	I find that the Project MAY have a "potentially significant imparting ated" impact on the environment, but at least one effect an earlier document pursuant to applicable legal standard mitigation measures based on the earlier analysis as de ENVIRONMENTAL IMPACTREPORT is required, but it must analyse addressed.	:1) has been adequately analyzed in ds, and 2) has been addressed by escribed on attached sheets. An
	I find that although the Project could have a significant effect potentially significant effects (a) have been analyzed adequated DECLARATION pursuant to applicable standards, and (b) have to that earlier EIR or NEGATIVE DECLARATION, including revisit imposed upon the Project, nothing further is required.	ately in an earlier EIR or NEGATIVE been avoided or mitigated pursuant
	Signature	Date
	Printed Name	

#### V. EVALUATION OF ENVIRONMENTAL IMPACTS

Potential environmental effects of the project are classified and described within the CEQA Environmental Checklist under the following general headings:

**"No Impact"** applies where the impact simply does not apply to projects like the one involved. For example, if the project area is not located in a fault rupture zone, then the item asking whether the project would result in or expose people to potential impacts involving fault rupture should be marked as "No Impact."

"Less Than Significant Impact" applies where the impact would occur, but the magnitude of the impact is considered insignificant or negligible. For example, a development which would only slightly increase the amount of surface water runoff generated at a project area would be considered to have a less than significant impact on surface water runoff.

"Potentially Significant Unless Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." Incorporated mitigation measures should be outlined within the checklist and a discussion should be provided which explains how the measures reduce the impact to a less than significant level. This designation is appropriate for a Mitigated Negative Declaration, where all potentially significant issues have been analyzed and mitigation measures have been recommended that reduces all impacts to levels that are less than significant.

"Potentially Significant Impact" applies where the project has the potential to cause a significant and unmitigable environmental impact. If there are one or more items marked as "Potentially Significant Impact," an Environmental Impact Report is required.

#### 1. Aesthetics

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than- Significant Impact	No Impact
a.	Except as provided in Public Resources Code Section 21099, would the Project: Have a substantial adverse effect	П	П	П	$\boxtimes$
а. b.	on a scenic vista? Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and	П	П	П	$\boxtimes$
U.	historic buildings within a state scenic highway? In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are				KA
C.	those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?  Create a new source of substantial				
d.	light or glare which would adversely affect day or nighttime views in the area?				

#### **Environmental Setting**

Agricultural land frames the project area. The existing bridge is a single-lane steel truss bridge that is approximately 130 feet long and provides the only access route to approximately 12 properties located east of the creek. The project is located approximately 150 feet east of SR-150, a state eligible scenic highway. The eligible state scenic highways are not recognized as part of the State Scenic Highway Program; however, SR-150 is considered a local scenic resource and a primary viewing corridor according to the Santa Paula 2040 General Plan (City of Santa Paula, 2020).

#### **Discussion of Checklist Responses**

#### a. Would the project have a substantial adverse effect on a scenic vista?

**No Impact.** A scenic vista is defined as a viewpoint that provides expansive views of a highly valued landscape for the benefit of the general public. The County has identified scenic areas and highways in the General Plan Resources Appendix. The project area does not include any County-designated scenic resources (Ventura County, 2019). However, the project area is located approximately 150 feet east of SR-150, a state-eligible scenic highway; SR-150 is also identified in the Santa Paula 2040 General Plan as a primary viewing corridor. Views from SR-150 are of mainly urban uses with the peaks north of the city of

Santa Paula visible in the background (City of Santa Paula, 2020). The existing bridge is visible from SR-150; however, views of the proposed bridge would be the same in character and quality to existing views. The proposed bridge rehabilitation would have a negligible change in appearance. The proposed design would not obstruct or impact existing scenic corridors nor change the appearance of the bridge. Therefore, the project would result in no impact on a scenic vista or scenic resources.

b. Would the project substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

**No Impact.** See discussion in response (a) above.

c. Would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point).

Less Than Significant Impact. The project area is visible from nearby rural residential and agricultural properties. Views of the project area include transportation facility (a 1-lane roadway and bridge). The rehabilitated bridge would match the rural community remain the same length, material, and alignment. The project includes repairing the foundation of the bridge, which would have a negligible change in appearance. Views of the proposed bridge would be the same in character and quality to existing views. Disturbed vegetation would be replaced following project completion. Therefore, the project would result in less than significant impacts on visual character and quality from the project area.

#### d. New Sources of Light or Glare?

**No Impact.** Bridge Road is unlit but has minimal sources of light and glare from surrounding residential and agricultural properties. The project would not include the addition or modification of existing light sources. Additionally, the project would not change the materials, alignment, or capacity of the bridge in a way that would result in impacts of glare on surrounding land uses. Project construction would be conducted during daylight hours and would not require lighting Therefore, the project would result in no impact on light and glare.

## 2. Agriculture and Forestry Resources

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than- Significant Impact	No Impact
ress lead Agr Asso Cali mo agri who tim effe con For stat Fore pro	determining whether impacts to agricultural cources are significant environmental effects, and agencies may refer to California icultural Land Evaluation and Site essment Model (1997) prepared by the fornia Dept. of Conservation as an optional del to use in assessing impacts on culture and farmland. In determining ether impacts to forest resources, including berland, are significant environmental ects, lead agencies may refer to information inplied by the California Department of estry and Fire Protection regarding the est and Range Assessment project; and est carbon measurement methodology vided in Forest Protocols adopted by the fornia Air Resource Board. Would the				
	ject: Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the				
a.	maps prepared pursuant to the Farmland Mapping and Monitoring Program (FMMP) of the California Resources Agency, to nonagricultural use?				
b.	Conflict with existing zoning for agricultural use, or a Williamson Act contract?				$\boxtimes$
	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code (PRC) section	_	_	_	_
C.	12220(g)), timberland (as defined by PRC 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?				
d.	Result in the loss of forest land or conversion of forest land to non-forest use?  Involve other changes in the existing				
e.	environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?				⊠

#### **Environmental Setting**

The current zoning classification for the project area is Agricultural Exclusive, 40-acre minimum parcel size (AE-40) (Ventura County, County View, n.d) and an Agriculture land use designation. The CDOC Important Farmland Finder shows that the project area is in an area classified as Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Other Land, and Urban and Built-Up Land. (California

Department of Conservation, 2016). The project area is adjacent to land designated for Agricultural, Open Space, and Very Low-Density Residential use. Land within the project area is not under any Williamson Act contract (California Department of Conservation, 2016). The surrounding area is not zoned as forest land or timberland.

#### **Discussion of Checklist Responses**

a. Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program (FMMP) of the California Resources Agency, to nonagricultural use?

**No Impact.** The CDOC's Important Farmland Finder shows that the project area is in an area classified as Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Other Land, and Urban and Built-Up Land (California Resources Agency, 2018). The project would not require permanent ROW acquisitions, but TCEs would be required from six adjacent private parcels (APNs 040-0-100-070, 040-0-120-250, 040-0-120-340, 040-0-130-310, 040-0-100-195, and 040-0-120-385). Additionally, permanent easements may be required from two private parcels (APNs 040-0-120-250 and 040-0-100-195), and permissible access would be required from six private parcels (APNs 040-0-120-250, 040-0-120-245, 040-0-120-335, 040-140-305, 040-0-120-265, and 040-0-120-250). However, the permanent easements would not be converted to non-agricultural use. Therefore, the project would result in no impact on Important Farmland.

- **b.** Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract? **No Impact.** The project is not within or adjacent to land under a Williamson Act contract. Therefore, the project would result in no impact on zoning of agricultural land or land under a Williamson Act contract.
- c. Would the project conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production?

**No Impact.** The project area is not zoned for forest land. The project area does not include timberland production. Therefore, the project would result in no impact on forest land.

- d. Would the project result in the loss of forest land or conversion of forest land to non-forest use?

  No Impact. The project area is not zoned for, nor does it include forest land. See discussion in response (c) above. Therefore, the project would result in no impact on forest land.
- e. Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

**No Impact.** See discussion in response (a) and response (c).

## 3. Air Quality

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Whe	n available, the significance				
	ria established by the applicable				
	uality management or air pollution				
	rol district may be relied upon to e the following determinations.				
	Id the Project:				
vvou	Conflict with or obstruct				
a.	implementation of the applicable			$\boxtimes$	
	air quality plan?				
	Result in a cumulatively				
	considerable net increase of any				
	criteria pollutant for which the				
b.	project region is non-attainment				
	under an applicable federal or				
	state ambient air quality standard?				
	Expose sensitive receptors to				
c.	substantial pollutant			$\boxtimes$	
	concentrations?				
	Result in other emissions (such				
d.	as those leading to odors)		П	$\bowtie$	П
u.	adversely affecting a substantial	_	_		
	number of people?				

#### **Environmental Setting**

#### Air Quality Standards and Attainment

The project area is located in Ventura County. Ventura County is in the South Central Coast Air Basin (SCCAB), which is under the jurisdiction of the Ventura County Air Pollution Control District (VCAPCD), the Santa Barbara County Air Pollution Control District, and the San Luis Obispo Air Pollution Control District. The project area is within the portion of the SCCAB that is overseen by the VCAPCD. The VCAPCD is a local air quality management agency required to monitor air pollutant levels to ensure that state and federal air quality standards are met and, if they are not met, to develop strategies to meet the standards. Ventura County is then classified as being in "attainment" or "nonattainment" based on whether standards are met.

The Ventura County portion of the SCCAB is designated a nonattainment area for the federal and state 8-hour ozone ( $O_3$ ) standards and the state 1-hour ozone and particulate matter with a diameter of 10 microns or less ( $PM_{10}$ ) standards (Ventura County Air Pollution Control District). Ventura County is in attainment of all other federal and state standards. The County is required to implement strategies to reduce pollutant levels to recognized acceptable standards

#### **Air Quality Management**

The VCAPCD's 2016 Air Quality Management Plan (AQMP) is an update of the 2007 AQMP. The 2016 AQMP, adopted on February 14, 2017, incorporates new scientific data and notable regulatory actions that have occurred since adoption of the 2007 AQMP, including the approval of the new federal 8-hour ozone  $(O_3)$  standard of 0.070 parts per million that was finalized in 2015. The 2016 AQMP builds upon the approaches taken in the 2007 AQMP and includes attainment and reasonable further progress

demonstrations of the new federal 8-hour O<sub>3</sub> standard (VCAPCD 2017).

#### Air Pollutant Emission Thresholds

The 2016 AQMP provides a strategy for the attainment of state and federal air quality standards. The VCAPCD considers construction-related air quality impacts to be significant if project construction (individually and cumulatively) would jeopardize attainment of the federal 1-hour standard by generating more than 25 pounds per day (ppd) of reactive organic compounds (ROC) or nitrogen oxides (NO $_{\rm x}$ ).

The VCAPCD implements rules and regulations for emission that may be generated by various uses and activities. The rules and regulations detail pollution-reduction measures that must be implemented during construction and operation of projects (VCAPCD, 2003).

#### Significance Thresholds

The VCAPCD has adopted guidelines for quantifying and determining the significance of air quality emissions in its Air Quality Assessment Guidelines for construction and operation of a project (VCAPCD, 2003).

Construction-related air quality impacts are considered to be significant if project construction (individually and cumulatively) would jeopardize attainment of the federal 1-hour standard by generating more than 25 ppd of ROC or  $NO_X$ . Additionally, operational air quality impacts are considered to be significant if a project would generate more than 25 ppd of the ozone precursors ROC or  $NO_X$ . A project with emissions that exceed two ppd of ROC or  $NO_X$  is found to be inconsistent with the AQMP and would have a cumulatively considerable contribution to a significant cumulative air quality impact related to ozone. Typically, inconsistent projects cause the existing population to exceed the population forecasts contained in the most recently adopted AQMP (VCAPCD, 2003).

There are no established quantitative thresholds for particulate matter for either construction or operation, but the VCAPCD provides guidance by stating that a project would have a significant impact if it would be reasonably expected to generate fugitive dust emissions in such quantities as to cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which may endanger the comfort, repose, health, or safety of any such person or the public. Additionally, there is not an established quantitative threshold for carbon monoxide (CO) for either construction or operation. The VCAPCD guidance for CO, states that a CO hotspot screening analysis should be conducted for any project with indirect CO emissions greater than the applicable ozone project significance thresholds (i.e., 25 ppd) that may significantly impact roadway intersections currently operating at, or that are expected to operate at, Level of Service (LOS) E or F. A CO hotspot screening analysis should also be conducted for any project-impacted roadway intersection at which a CO hotspot might occur (VCAPCD, 2003). If project emissions exceed these criteria and the screening analysis demonstrates there may be a CO hotspot, the VCAPCD recommends use of the CALINE4 model to determine whether the project would create or contribute to an existing CO hotspot.

#### **Discussion of Checklist Responses**

a. Would the project conflict with or obstructimplementation of the applicable air quality plan? Less Than Significant Impact. As mentioned previously the Air Quality Assessment Guidelines for construction and operation of a project state that the VCAPCD considers construction-related air quality impacts to be significant if project construction (individually and cumulatively) would jeopardize

attainment of the federal 1-hour standard by generating more than 25 ppd of ROC or  $NO_x$ . According to the Air Quality and Greenhouse Gas Technical Memorandum prepared for this project, the proposed construction activities would require various activities, including site preparation, cut-and-fill activities, grading, trench/excavation, removing or improving existing roadway surfaces, and paving roadway surfaces. During construction, short-term degradation of air quality is expected from the release of particulate emissions (airborne dust) generated by earthmoving activities. The use of off-road equipment and on-road vehicles would also result in short-term mobile-source emissions. These emissions would be temporary and predominantly limited to the immediate area surrounding the construction site (Ambient Air Quality and Noise Consulting, 2021). Construction emissions were estimated using the California Emissions Estimator Model (CalEEMod), version 2020.4.0. Emissions were quantified based on project-specific construction information provided for the proposed project, including construction schedules, equipment usage, and material hauling (Ambient Air Quality and Noise Consulting, 2021).

Estimated construction-generated emissions of criteria air pollutants, including reactive organic gases (ROG), nitrogen oxides (NO<sub>x</sub>), CO, respirable particulate matter (PM<sub>10</sub>), particulate matter 2.5 microns or less (PM<sub>2.5</sub>) are summarized in **Table 2**. As depicted, the project would generate maximum daily emissions of approximately 1.2 ppd of PM<sub>10</sub>, 0.6 ppd of PM<sub>2.5</sub>, 9.9 ppd of CO, 13.6 ppd of NO<sub>x</sub>, and 1.4 ppd of ROG. Annual emissions would total approximately 0.3 tons/year of CO and NO<sub>x</sub>, and less than 0.1 tons/year of ROG, PM<sub>10</sub>, and PM<sub>2.5</sub>.

**Table 2 Estimated Construction Emissions of Criteria Air Pollutants** 

Construction Phase	PM <sub>10</sub>	PM <sub>2.5</sub>	СО	NO <sub>x</sub>	ROG
Construction Phase	(ppd)	(ppd)	(ppd)	(ppd)	(ppd)
Clearing & Grubbing	0.2	0.1	1.9	3.0	0.3
Construct Temporary Weather Crossing	0.8	0.3	5.2	4.8	0.5
Grading Temporary Access Ramp	1.2	0.4	8.6	8.8	1.0
Structure Excavation	0.4	0.3	8.4	6.6	0.7
Drilling & Secant Pile Wall Construction	1.0	0.6	9.9	13.6	1.2
Backfill & Channel Restoration	0.3	0.2	5.2	4.8	1.4
Bridge Work	0.3	0.2	4.9	3.4	0.4
Maximum (pounds/day)	1.2	0.6	9.9	13.6	1.4
Total (tons/construction project)	<0.1	<0.1	0.3	0.3	<0.1

Source: (Ambient Air Quality and Noise Consulting, 2021)

Notes: Emissions estimated using the CalEEMod computer program, version 2020.4.0.

The project would be constructed in compliance with VCAPD thresholds set in the Air Quality Assessment Guidelines since the project would generate less than 25 ppd of ROC and  $NO_X$ . In addition, **AQ-1** through **AQ-9** would be implemented to minimize air quality emissions resulting from construction activities. Therefore, the project would result in a less than significant on the implementation of an applicable air quality plan.

# b. Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Less Than Significant Impact. Ventura County is in nonattainment with National Ambient Air Quality Standards for O<sub>3</sub> and is in nonattainment with California Ambient Air Quality Standards for O<sub>3</sub>, and PM<sub>10</sub> (see **Table 3**). Project construction would result in temporary emissions (see **Table 2**). In addition, the project would not contribute additional long-term operational emissions. Temporary construction emissions would not be cumulatively considerable with implementation of measures **AQ-1** through **AQ-9**. Therefore, the project would result in a less than significant impact on the net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.

Table 3 State and Federal Nonattainment Pollutants

Pollutant	Standard	Attainment Status
Ozone	1 Hour	State Nonattainment
Ozone	8 Hour	State and Federal Nonattainment
Particulate Matter	24 Hour	State Nonattainment
rai liculate iviattel	Annual Arithmetic Mean	State Norialianinient

Source: (Ventura County Air Pollution Control District)

#### c. Would the project expose sensitive receptors to substantial pollutant concentrations?

**Less Than Significant Impact.** During construction, short-term degradation of air quality is expected from the release of particulate emissions generated by earthmoving activities. The use of off-road equipment and on-road vehicles would also result in short-term mobile-source emissions. These emissions would be temporary and predominantly limited to the immediate area surrounding the construction site. As shown in **Table 2**, the project would generate maximum daily emissions of approximately 1.2 ppd of  $PM_{10}$ , 0.6 ppd of  $PM_{2.5}$ , 9.9 pp

Sources of fugitive dust include disturbed soils at the construction site and trucks carrying uncovered loads of soils. Unless properly controlled, vehicles leaving the site may deposit mud on local streets, which could be an additional source of airborne dust after it dries. Dust emissions may vary from day to day, depending on the nature and magnitude of construction activity and local weather conditions. Dust emissions depend on soil moisture, silt content of soil, wind speed, and the amount of equipment operating. Larger dust particles would settle near the source, while fine particles will be dispersed over greater distances from the construction site. The nearest sensitive receptors are residential properties, adjacent to the project area. The closest residence is located approximately 40 feet away from the project area. Implementation of the measures AQ-1 through AQ-9 would reduce air quality emissions resulting from construction activities. Implementation of these measures would be anticipated to reduce construction-related fugitive dust emissions by approximately 50 percent or more. Project operation would not result in long-term emissions of additional air quality pollutants. Therefore, the project would result in a less than significant impact related to the exposure of sensitive receptors to substantial pollutant concentrations.

# d. Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less Than Significant Impact. Minor sources of odors would be present during construction. The predominant source of power for construction equipment is diesel engines. Exhaust odors from diesel engines, as well as emissions associated with asphalt paving, may be considered offensive to some individuals. The closest residence is located approximately 40 feet away from the project area. However, because odors would be temporary and would disperse rapidly, construction-generated odors would not be anticipated to result in the frequent exposure of receptors to objectionable odorous emissions. Standard avoidance and minimization measures (see AQ-1) would be implemented during project construction to minimize release of air quality pollutants. Project operation would not result in long-term generation of additional air quality pollutants. Therefore, the project would result in a less than significant impact related to emissions (such as odors) affecting a large number of people.

#### Avoidance, Minimization, and/or Mitigation Measures

- **AQ-1** VCAPCD rules—Rule 55; Nuisance, Rule 51; Rule 52 Particulate Matter Concentration, would be applied during project construction to minimize air quality pollutants as a result of construction activity.
- AQ-2 The construction contractor would comply with the Caltrans' standard Specifications in Section 14-9 (2018). Section 14-9-02 specifically requires compliance by the contractor with all applicable laws and regulations related to air quality, including air pollution control district and air quality management district regulations and local ordinances.
- AQ-3 Pre-grading/excavation activities would include watering the area to be graded or excavated before commencement of grading or excavation operations. Application of water (preferably reclaimed, if available) should penetrate sufficiently to minimize fugitive dust during grading activities.
- **AQ-4** Fugitive dust produced during grading, excavation, and construction activities would be controlled by the following activities:
  - All trucks should be required to cover their loads as required by California Vehicle Code §23114.
  - All graded and excavated material, exposed soil areas, and active portions of the
    construction site, including unpaved on-site roadways, should be treated to prevent
    fugitive dust. Treatment should include, but not necessarily be limited to, periodic
    watering, application of environmentally-safe soil stabilization materials, and/or rollcompaction as appropriate. Watering should be done as often as necessary and reclaimed
    water should be used whenever possible.
- AQ-5 Graded and/or excavated inactive areas of the construction site would be monitored by the environmental monitor at least weekly for dust stabilization. Soil stabilization methods, such as water and roll-compaction, and environmentally-safe dust control materials, would be periodically applied to portions of the construction site that are inactive for over four days. If no further grading or excavation operations are planned for the area, the area would be seeded and watered until grass growth is evident, or periodically treated with environmentally-safe dust

suppressants, to prevent excessive fugitive dust.

- **AQ-6** Signs would be posted on-site limiting traffic to 15 miles per hour or less.
- AQ-7 During periods of high winds (i.e., wind speed sufficient to cause fugitive dust to impact adjacent properties), all clearing, grading, earth moving, and excavation operations would be curtailed to the degree necessary to prevent fugitive dust created by on-site activities and operations from being a nuisance or hazard, either off-site or on-site. The site superintendent/supervisor should use his/her discretion in conjunction with VCAPCD in determining when winds are excessive.
- AQ-8 Adjacent streets and roads would be swept at least once per day, preferably at the end of the day, if visible soil material is carried over to adjacent streets and roads.
- **AQ-9** Personnel involved in grading operations, including contractors and subcontractors, would be advised to wear respiratory protection in accordance with California Division of Occupational Safety and Health regulations.

## 4. Biological Resources

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than- Significant Impact	No Impact
Wou	Ild the Project:  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 CDFW or USFWS?				
b.	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by CDFW or USFWS?				
C.	Have a substantial adverse effect on state or federally protected wetlands (including but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				
d.	Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?				
e.	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				
f.	Conflict with the provisions of an adopted Habitat Conservation Plan (HCP); Natural Community Conservation Plan; or other approved local, regional, or state HCP?				⊠

#### **Environmental Setting**

The following discussion incorporates the results of the Natural Environment Study (NES) (March 2021), California Red-Legged Frog Habitat Assessment (May 2021), and Water Quality Assessment Report (February 2021) prepared for this project.

#### **Biological Study Area**

The project area is separated into two biological study areas (BSA): North BSA and South BSA. The North BSA is approximately 4.74 acres and includes the permanent project footprint, temporary construction work area, potential staging areas, and up to a 20-foot buffer around these areas. Features in the North BSA include Santa Paula Creek, Side Channel A, the bridge, approximately 300 feet upstream and 300 feet downstream of the bridge.

The South BSA is approximately 2.16 acres and includes the temporary construction work area, potential staging areas, and up to a 300-foot buffer around these areas. Features in the South BSA include Santa Paula Creek, Side Channel B, the temporary access road, and approximately 320 feet upstream and 125 feet downstream of the temporary creek crossing (GPA Consulting, 2021d).

#### Santa Paula Creek

The headwaters of the creek are along the south-facing slopes of the Topatopa Mountains, approximately 6,500 feet above mean sea level (U.S. Geological Survey, 2018). Santa Paula Creek is a perennial creek, flows in a southeasterly direction, and is a major tributary to the lower Santa Clara River. Annual flows in the creek vary substantially, with multi-year droughts and seasonal flooding (RBF Consulting and Stillwater Sciences, 2009). Within the BSA, the creek consists of a low-flow channel within the active floodplain and low terraces. Erosion of the banks was visible with debris falling into the creek at the time of the survey (GPA Consulting, 2021c).

#### Side Channel A

Side Channel A is an intermittent, earthen channel on a terrace on the west side of Santa Paula Creek and upstream of Bridge Road Bridge. The channel originates further upstream (outside of the BSA). Water flows into the channel from a seep on the west bank of Santa Paula Creek. In addition, water is occasionally released into the channel from the Canyon Irrigation Water Diversion storage reservoir immediately adjacent to SR-150 and north of the bridge. Within the BSA, the channel flows in a southern direction. At the time of the survey Side Channel A was filled with native riparian vegetation and the soil in the channel was moist, but no flowing water was observed (GPA Consulting, 2021c).

#### Side Channel B

Side Channel B is an ephemeral, earthen channel, east of the creek and downstream of Bridge Road Bridge. This channel appears to originate from the adjacent orchards east of Bridge Road and north of Fair Weather Crossing, outside of the BSA. Within the South BSA, the channel flows in a southwesterly direction and into the creek. At the time of the survey, Side Channel B had vegetation along the banks and the channel was dry (GPA Consulting, 2021c).

#### Jurisdictional Features

#### **United States Army Corps of Engineers**

The creek is a naturally occurring perennial surface water that flows into the Santa Clara River (a traditional navigable waterway). Side Channel A is a naturally occurring intermittent, earthen bottom channel on a terrace within the creek. Side Channel B is a naturally occurring ephemeral, earthen bottom channel that drains into the creek. Naturally occurring tributaries are anticipated to be under jurisdiction of the USACE. Therefore, the creek, Side Channel A, and Side Channel B are expected to fall under jurisdiction of the USACE.

The BSAs were evaluated for wetlands and non-wetland waters under jurisdiction of the USACE by delineating the OHWM and assessing the presence of hydrophytic vegetation, hydric soils, and wetland hydrology. Approximately 0.001 acre of wetlands and 0.865 acre of non-wetland waters of the U.S. were delineated within the BSA (see **Table 4**).

Table 4 USACE Jurisdictional Features Delineated in the Biological Study Area

Feature	Jurisdictional Wetlands within BSA (acres)	Jurisdictional Non- Wetlands within BSA (acres)	Total Jurisdiction within the BSA (acres)				
North BSA							
Santa Paula Creek	0.001	0.273	0.274				
Side Channel A		0.037	0.037				
Side Channel B		0.055	0.055				
South BSA	South BSA						
Santa Paula Creek	-	0.500	0.500				
Total	0.001	0.865	0.866				

#### Regional Water Control Board

There was flowing water in the creek at the time of the survey. Although Side Channel A did not have flowing waters at the time of the survey, this feature has intermittent flows. Similarly, Side Channel B did not have flowing waters at the time of the survey, but this feature has ephemeral flows. Therefore, the creek, Side Channel A, and Side Channel B are expected to fall under the jurisdiction of the RWQCB.

The BSA was evaluated for wetlands and non-wetland waters under jurisdiction of the RWQCB by delineating the OHWM and assessing the presence of hydrophytic vegetation, hydric soils, and wetland hydrology. Approximately 0.001 acre of wetlands and 0.865 acre of non-wetland waters of the state were delineated within the BSA (see **Table 5**).

Table 5 Potential RWQCB Jurisdictional Features Delineated in the Biological Study Area

Feature	Jurisdictional Wetlands within BSA (acres)	Jurisdictional Non- Wetlands within BSA (acres)	Total Jurisdiction within the BSA (acres)
North BSA			
Santa Paula Creek	0.001	0.273	0.274
Side Channel A	-	0.037	0.037
South BSA			
Santa Paula Creek	-	0.500	0.500
South Channel B	-	0.055	0.055
Total	0.001	0.865	0.866

#### California Department of Fish and Wildlife

The creek, Side Channel A, and Side Channel B had defined bed and banks and supported vegetation at the time of the survey and are expected to fall under the CDFW jurisdiction. The BSA was evaluated for areas under jurisdiction of the CDFW by delineating the top of bank to the top of bank, extending to the edge of the riparian habitat. Approximately 6.873 acres under CDFW jurisdiction were delineated within the BSA (see **Table 6**).

#### Table 6 Potential CDFW Jurisdictional Features Delineated in the Biological Study Area

Feature	Total Jurisdiction within the BSA (acres)	
North BSA	4.712	
South BSA	2.161	
Total	6.873	

Notes: Includes Santa Paula Creek, Side Channel A, and surrounding riparian habitat. Includes Santa Paula Creek, Side Channel B, and surrounding riparian habitat.

#### Regional Species, Habitats, and Natural Communities of Concern

An updated California Natural Diversity Database (CNDDB) species list was obtained on February 8, 2022, to identify federally and state listed species with the potential to be in the BSA based on their geographical range. USFWS and NMFS species lists were obtained on November 14, 2021, and January 20, 2021, respectively, for the same purpose and to identify critical habitat within the BSA. The following discussion describes the special-status plant and wildlife species with potential to be in the BSA based on (1) a record reported in the CNDDB, NMFS, and/or USFWS species lists, (2) the presence of suitable habitat, and (3) survey results.

The definition of the state listing/ranks of species with potential to be in the BSAs are described below (California Department of Fish and Wildlife, 2019):

- S1 = Critically imperiled in the state because of extreme rarity or because of some factor(s) such as very steep declines making it especially vulnerable to extirpation from the state
- S2 = Imperiled in the state because of rarity or because of restricted range, very few populations, steep declines, or other factors making it very vulnerable to extirpation from the nation or state
- S3 = Vulnerable in the state because of a restricted range, relatively few populations, recent or widespread declines, or other factors making it vulnerable to extirpation
- S4 = Uncommon but not rare; some cause for long-term concern because of declines or other factors
- SSC = a species, subspecies, or distinct population of animal native to California that currently satisfies one or more of the following criteria: (1) is extirpated from the state or, in the case of birds, is extirpated in its primary season or breeding role; (2) is listed as Federally-, but not State-, threatened or endangered; meets the State definition of threatened or endangered but has not formally been listed; (3) is experiencing, or formerly experienced, serious (noncyclical) population declines or range retractions (not reversed) that, if continued or resumed, could qualify it for State threatened or endangered status; or (4) has naturally small populations exhibiting high susceptibility to risk from any factor(s), that if realized, could lead to declines that would qualify it for State threatened or endangered status
- SNR = Unranked; state conservation status not yet assessed
- 1B.1 = Plant species are rare, threatened, or endangered in California and elsewhere; seriously threatened in California
- 1B.2 = Plant species are rare, threatened, or endangered in California and elsewhere; moderately threatened in California
- 1B.3 = Plant species are rare, threatened, or endangered in California and elsewhere; not very threatened in California
- 2B.2 = Plant species are rare, threatened, or endangered in California, but more common elsewhere; fairly threatened in California
- 4.2 = Plant species of limited distribution; fairly threatened in California
- 4.3 = Plant species of limited distribution; not very threatened in California

#### **Vegetation Communities**

Vegetation within the BSA includes a mix of native and non-native species. Vegetation communities and cover classes within the BSA were classified based on the Manual of California Vegetation (Sawyer, Keeler-Wolf, & Evens, 2012) and the U.S. National Vegetation Classification (U.S. National Vegetation Classification, 2019). Nine vegetation communities and six cover classes were identified in the BSA (see **Figure 5).** 

#### <u>Artemisia Californica Shrubland Alliance (California Sagebrush Scrub)</u>

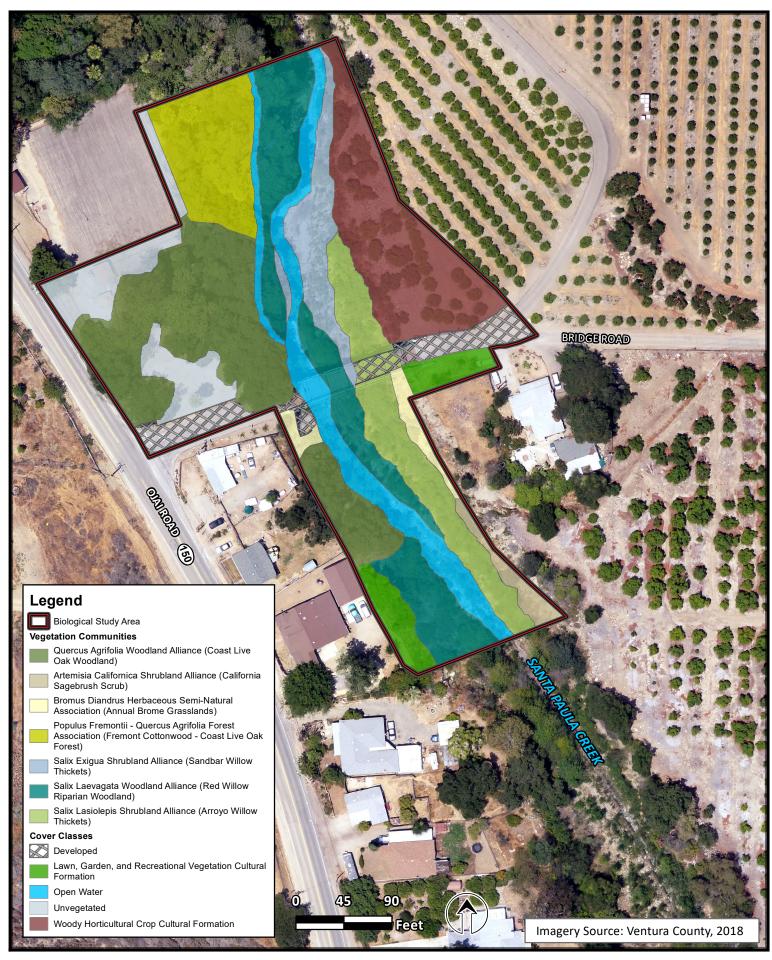
Artemisia Californica Shrubland Alliance (California Sagebrush Scrub) communities are dominated by California sagebrush (Artemisia californica) in the shrub canopy. Characteristic species in this community include chamise (Adenostoma fasciculatum), coyote brush (Baccharis pilularis), bladderpod (Cleome isomeris), sticky monkeyflower (Diplacus aurantiacus), bush sunflower (Encelia californica), brittlebush (Encelia farinosa), California buckwheat (Eriogonum fasciculatum), chapparal yucca (Hesperoyucca whipplei), white flowered goldenbush (Isocoma menziesii), heart leaved keckiella (Keckiella cordifolia), deerweed (Acmispon glaber formerly Lotus scoparius), prickly pear (Opuntia littoralis), lemonade berry (Rhus integrifolia), white sage (Salvia apiana), purple sage (Salvia leucophylla), black sage (Salvia mellifera), black elderberry (Sambucus nigra), and poison oak (Toxicodendron diversilobum). Emergent trees or tall shrubs may be present at low cover percentages. California sagebrush is greater than 60 percent relative cover in the shrub canopy. This community is characterized by shrubs either less than approximately seven feet tall or two cover tiers with the second tier less than 16 feet tall. Additional characteristics of this community include a continuous to intermittent canopy and a seasonally and annually variable herbaceous layer. California Sagebrush Scrub communities are found on slopes that are steep and rarely flooded and where there are low-gradient deposits along streams.

#### Baccharis salicifolia Shrubland Alliance (Mulefat Thickets)

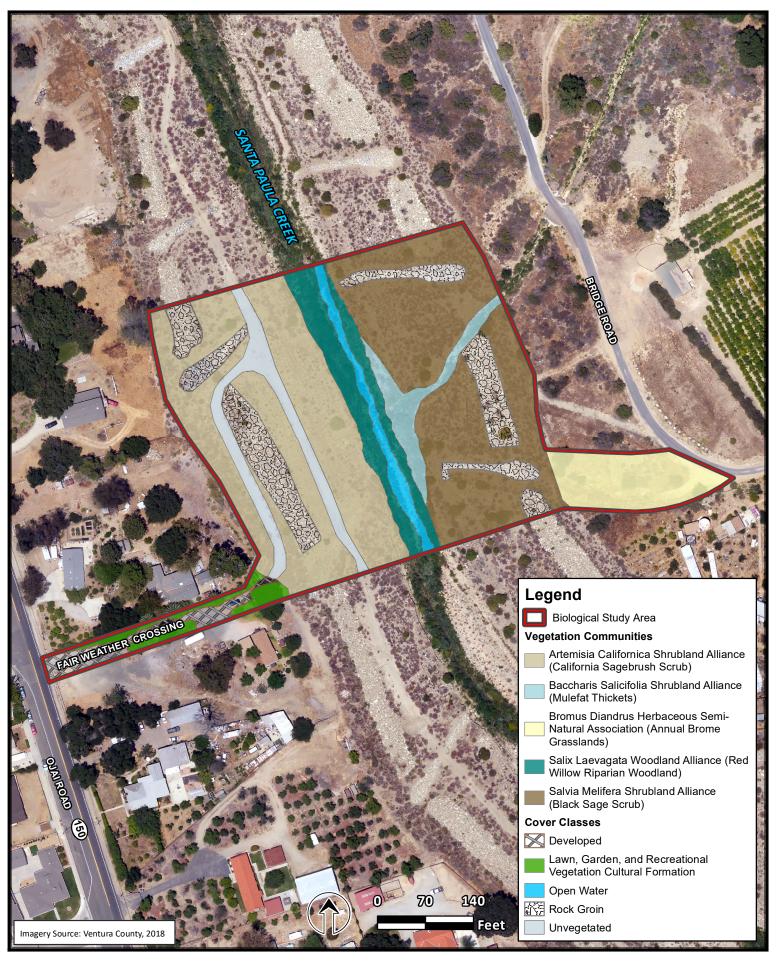
Baccharis salicifolia Shrubland Alliance (Mulefat Thickets) communities are dominated by mulefat (Baccharis salicifolia) in the shrub canopy. Characteristic species in this community include California sagebrush, willow baccharis (Baccharis emoryi), coyote brush, laurel sumac, tree tobacco (Nicotiana glauca), arrow weed (Pluchea sericea), blackberry species (Rubus spp.), sandbar willow (Salix exigua), arroyo willow (Salix lasiolepis), black elderberry, and tamarisk species (Tamarix spp.). Emergenttrees may be present at low cover, including gray pine (Pinus sabiniana), California sycamore, Fremont cottonwood (Populus fremontii), oak species (Quercus spp.), or willow species (Salix spp.). Mulefat is greater than 50 percent relative cover. This community is characterized by shrubs less than approximately 16.4 feet tall, a continuous canopy with two tiers at less than approximately seven feet and 16 feet tall, and a sparse herbaceous layer. Mulefat Thickets are found in irrigation ditches or stream channels, and on canyon bottoms and floodplains along lake margins.

#### Bromus Diandrus Herbaceous Semi-Natural Association (Annual Brome Grasslands)

Bromus Diandrus Herbaceous Semi-Natural Association (Annual Brome Grasslands) communities are dominated by ripgut brome (Bromus diandrus) in the herbaceous layer. Characteristic species in this community include Australian saltbush (Atriplex semibaccata), (Hordeum spp.), and other non-native species. Emergent trees and shrubs may be present at low cover. Ripgut brome is greater than 60 percent relative cover with other non-natives in the herbaceous layer and with a variety of annuals at low cover. This community is characterized by herbs less than four feet tall and open to continuous cover. Annual Brome Grasslands are found in foothills, waste places, rangelands, and openings in woodlands (see Figure 5).









# Populus Fremontii-Quercus Agrifolia Forest Association (Fremont Cottonwood-Coast Live Oak Forest)

Populus Fremontii-Quercus Agrifolia Forest Association (Fremont Cottonwood-Coast Live Oak Forest) communities are co-dominated by Fremont cottonwood and coast live oak (Quercus agrifolia) in the tree canopy. Characteristic species in this community include boxelder (Acer negundo), desert baccharis (Baccharis sergiloides), Oregon ash (Fraxinus latifolia), velvet ash (Fraxinus velutina), northern California black walnut (Juglans hindsii), northern California black walnut-English walnut hybrid (Juglans hindsii × regia), California sycamore (Platanus racemosa), sandbar willow, Goodding's willow (Salix gooddingii), red willow, arroyo willow, Pacific willow, and yellow willow. Fremont cottonwood is greater than five percent absolute cover in the tree layer or greater than 50 percent relative cover in the tree layer. This community is characterized by trees less than approximately 82 feet tall, a continuous to open canopy, an intermittent to open shrub layer, and a variable herbaceous layer. Fremont Cottonwood-Coast Live Oak Forest communities are found in lower canyons in desert mountains, alluvial fans, and valleys with a dependable subsurface water supply that varies considerably during the year; along low-gradient rivers, perennial or seasonally intermittent streams, and springs; and on floodplains.

### Quercus Agrifolia Woodland Alliance (Coast Live Oak Woodland)

Quercus Agrifolia Woodland Alliance (Coast Live Oak Woodland) communities are dominated by coast live oak in the tree canopy. Characteristic species in this community include bigleaf maple (Acer macrophyllum), boxelder, Pacific madrone (Arbutus menziesii), southern California black walnut, California sycamore, Fremont cottonwood, blue oak (Quercus douglasii), Englemann oak (Quercus engelmannii), California black oak (Quercus kelloggii), valley oak, arroyo willow, and California bay (Umbellularia californica). Coast live oak are greater than 50 percent relative cover in the tree canopy or if California bay is present, the coast live oak is less than 33 percent relative cover in the tree canopy. This community is characterized by trees less than approximately 98 feet tall, an open to continuous canopy, a sparse to intermittent shrub layer, and a sparse or grassy herbaceous layer. Coast Live Oak Woodland communities are found on alluvial terraces, canyon bottoms, stream banks, slopes, and flats.

#### Salix Exigua Shrubland Alliance (Sandbar Willow Thickets)

Salix Exigua Shrubland Alliance (Sandbar Willow Thickets) communities are dominated by sandbar willow in the shrub canopy. Characteristic species in this community include baccharis species (Baccharis spp.), California brickellia (Brickellia californica), California wild rose (Rosa californica), Himalayan blackberry (Rubus armeniacus), California blackberry (Rubus ursinus), arroyo willow, and dusky willow (Salix melanopsis). Emergent trees of many different species may be present at low percent cover. Sandbar willow is greater than 20 percent absolute cover in the shrub canopy, greater than 50 percent relative cover in the shrub canopy or greater than/equal to five percent absolute cover and dominant in the shrub canopy. This community is characterized by shrubs less than approximately 23 feet tall, an intermittent to continuous canopy, and a variable herbaceous layer. Sandbar Willow Thickets are found on temporarily flooded floodplains, depositions along rivers and streams, and at springs.

# Salix Laevigata Woodland Alliance (Red Willow Riparian Woodland)

Salix Laevigata Woodland Alliance (Red Willow Riparian Woodland) communities are dominated by red willow in the tree or shrub canopy. Characteristic species in this community include boxelder, buckeye (Aesculus californica), white alder, incense cedar (Calocedrus decurrens), Oregon ash, gray pine, California sycamore, Fremont cottonwood, coast live oak, canyon live oak (Quercus chrysolepis), valley oak, Pacific willow, or California fan palm (Washingtonia filifera). Shrubs include mulefat, American dogwood (Cornus sericea), California wild rose, Himalayan blackberry, sandbar willow, arroyo willow, or black elderberry.

Red willow is greater than 50 percent relative cover in the tree canopy, or greater than five percent absolute cover and typically dominant in the tree canopy. This community is characterized by trees less than approximately 98 feet tall, an open to continuous canopy, a sparse to continuous shrub layer, and a variable herbaceous layer. Red Willow Riparian Woodland communities are found in seeps, springs, and ditches; along floodplains of streams, lake edges, and low-gradient depositions; and on terraces along large rivers and canyons.

# Salix Lasiolepis Shrubland Alliance (Arroyo Willow Thickets)

Salix Lasiolepis Shrubland Alliance (Arroyo Willow Thickets) communities are dominated by arroyo willow in the tall or low tree canopy. Characteristic species in this community include big leaf maple, coyote brush, mulefat, buttonbush (*Cephalanthus occidentalis*), dogwood, California wax myrtle (*Morella californica*), California sycamore, Fremont cottonwood, black cottonwood (*Populus trichocarpa*), willow species (*Salix spp.*), and black elderberry. Emergent trees may be present at low cover. Arroyo willow is greater than 50 percent cover in the shrub or tree canopy. This community is characterized by plants less than 33 feet tall, an open to continuous canopy, and a variable herbaceous layer. Arroyo willow thickets are found on stream banks and benches, along slope seeps, and as stringers along drainages.

# Salvia Mellifera Shrubland Alliance (Black Sage Scrub)

Salvia Mellifera Shrubland Alliance (Black Sage Scrub) communities are dominated by black sage in the shrub canopy. Characteristic species in this community include chamise, California sagebrush, coyote brush, sticky monkeyflower, bush sunflower, coastal buckwheat, California buckwheat, chaparral yucca, deerweed, chaparral bush mallow, laurel sumac, prickly pear, lemonade berry, and white sage. Emergent trees may be present at low cover. Black sage is greater than 60 percent relative cover in the shrub canopy. This community is characterized by shrubs less than approximately seven feet tall, a continuous or intermittent canopy, and a variable herbaceous layer with seasonal herbs and grasses. Black Sage Scrub communities are found on dry slopes and alluvial fans.

#### **Aquatic Resources**

Aquatic resources within the BSA were classified based on the *Classification of Wetlands and Deepwater Habitats of the United States* (Cowardin, Carter, Golet, & LaRoe, 1979). This system is the most widely accepted wetlands classification system, and it is currently used for the NWI mapping system. Under this system, wetlands are classified by identifying the delineated area's major class association (Riverine, Palustrine, Lacustrine, Estuarine, or Marine), general vegetation cover types, primary sources of hydrology, and factors related to the origin of the wetland.

#### Palustrine

A Palustrine System includes all freshwater wetlands (such as marshes, bogs, and swamps) dominated by trees, shrubs, emergent herbaceous plants, floating leaved and submergent plants, and mosses and lichens. It also includes wetlands without such vegetation, but with all of the following characteristics: (1) an area less than 20 acres, (2) a maximum water depth of 6.6 feet, and (3) a salinity of greater than 0.5 percent (Cowardin, Carter, Golet, & LaRoe, 1979). The Palustrine System in the North BSA is further classified as Broad-Leaved Deciduous Scrub-Shrub Wetland, Semi-Permanently Flooded.

# Palustrine Broad-Leaved Deciduous Scrub-Shrub Wetland, Semi-Permanently Flooded

This habitat class includes areas dominated by woody vegetation less than 20 feet tall. Typical Palustrine species that may grow in this habitat include alders (*Alnus* spp.), willows (*Salix* spp.), buttonbush (*Cephalanthus occidentalis*), red osier dogwood (*Cornus stolonifera*), honeycup (*Zenobia pulverulenta*), spirea (*Spiraea douglasii*), bog birch (*Betula pumila*), and young trees of species such as red maple (*Acer rubrum*) or black spruce (*Picea mariana*). Surface water persists throughout the growing season in most years; however, when surface water is absent, the water table is usually at or very near the surface (Cowardin, Carter, Golet, & LaRoe, 1979). The Palustrine, Broad-Leaved Deciduous Scrub-Shrub Wetland, Semi-Permanently Flooded habitat observed in the North BSA is classified as Red Willow Riparian Woodland and is in the creek.

## Riverine

A Riverine system includes all wetlands and deepwater habitats within natural and artificial stream, river, or ditch channels with two exceptions: (1) wetlands dominated by trees, shrubs, persistent, emergent mosses, or lichens, and (2) habitats with water containing ocean-derived salts of 0.5 part per thousand or greater. A channel is "an open conduit either naturally or artificially created which periodically or continuously contains moving water, or which forms a connecting link between two bodies of standing water" (Cowardin, Carter, Golet, & LaRoe, 1979). The Riverine system in the BSAs is further classified as Upper Perennial, Cobble-Gravel Unconsolidated Bottom, Permanently Flooded; Intermittent, Mud Streambed, Intermittently Flooded; and Intermittent, Cobble-Gravel Streambed, Intermittently Flooded.

# Riverine, Upper Perennial, Cobble-Gravel Unconsolidated Bottom, Permanently Flooded

This habitat class is characterized by a high gradient, well developed floodplain, no tidal influence, and some water flows throughout the year. The substrates are at least 25 percent cover of particles smaller than stones and largely determined by the velocity of the current. The unconsolidated particles smaller than stones are primarily cobble and gravel, finer sediments may be intermixed. Surface water covers the substrate throughout the year in all years (Cowardin, Carter, Golet, & LaRoe, 1979). The Riverine Upper Perennial, Cobble-Gravel Unconsolidated Bottom, Permanently Flooded habitat observed in the BSAs is classified as Open Water and is in the creek.

#### Riverine, Intermittent, Mud Streambed, Intermittently Flooded

This habitat class has flowing water for only part of the year. When flowing water is absent, there may be isolated pools, or the system is dry. The substrates are usually exposed and form depending on the gradient of the channel, velocity of the water, and the sediment load. The unconsolidated particles are smaller than stones and are predominately silt or clay (Cowardin, Carter, Golet, & LaRoe, 1979). The Riverine, Intermittent, Mud Streambed, Intermittently Flooded habitat observed in the North BSA is classified as Open Water and is within Side Channel A.

# Riverine, Intermittent, Cobble-Gravel Streambed, Intermittently Flooded

This habitat class has flowing water for only part of the year. When flowing water is absent, there may be isolated pools, or the system is dry. The substrates are usually exposed and form depending on the gradient of the channel, velocity of the water, and the sediment load. At least 25 percent of the substrate is covered by unconsolidated particles smaller than stones, predominately cobble or gravel (Cowardin, Carter, Golet, & LaRoe, 1979). The Riverine, Intermittent, Cobble-Gravel Streambed, Intermittently Flooded habitat observed in the South BSA is classified as Open Water and is within Side Channel B.

# Wildlife

Habitat in the BSA includes mature trees and shrubs along terraces of the creek and a mix of agricultural, ornamental, and native plant species along the creek terraces and upland areas that could support birds, bats, and other wildlife. Wildlife species observed during the field surveys include California tree frog (*Pseudacris cadaverina*), tiger swallowtail butterfly (*Papilio rutulus*), cottontail rabbit (*Sylvilagus* sp.), coyote (*Canis latrans*), California ground squirrel (*Otospermophilus beecheyi*), raccoon (*Procyon lotor*), southern alligator lizard (*Elgaria multicarinata*), western fence lizard (*Sceleporous occidentalis*), and several bird species.

### Habitat Connectivity

According to the CDFW BIOS, the BSA falls within the Santa Monica-Sierra Madre Connection (Paulman, 2009) and the closest natural landscape block is approximately 2.7 miles west of the BSA (Rustigian-Romsos, 2017). The Santa Monica-Sierra Madre Connection encompasses habitats between the Santa Monica Mountains National Recreation Area and Los Padres National Forest which allows for movement of 20 focal species, including but not limited to, mountain lion (*Puma concolor*), loggerhead shrike (*Lanius ludovicianus*), western toad (*Bufo boreas*), and southern steelhead (*Oncorhynchus mykiss mykiss*), (Paulman, 2009). Therefore, there is potential for the BSA to be used as a migration or travel corridor. In addition, the BSA may be used for local foraging and movement by urban wildlife species in the area.

#### **Natural Communities**

According to the CNDDB search, eight special-status natural communities have the potential to be in the BSAs based on recorded geographical distribution. Based on survey results, there are six special-status natural communities in the BSAs including Southern California Steelhead Stream, Southern Coast Live Oak Riparian Forest, Southern Cottonwood Willow Riparian Forest, Southern Mixed Riparian Forest, Southern Riparian Scrub, and Southern Willow Scrub (see **Table 7**). Based on biological survey results, two special-status natural communities are absent from the BSA.

#### Special-Status Plants

According to the CNDDB, California Native Plant Society (CNPS), and USFWS searches, 40 special-status plants have the potential to be in the BSA based on recorded geographical distribution. Based on habitat requirements and survey results, there is potential for 11 special-status plant species to be in the BSA (see **Table 8**). Based on evaluation of habitat requirements, species range, and biological reconnaissance survey results, 29 special-status plant species do not have potential habitat and are not expected to be in the BSA. The plants listed are considered to be of special concern based on (1) federal, state, or local laws regulating their development; (2) limited distributions; and/or (3) the presence of habitat required by the special-status plants occurring on site. The southern California black walnut plant was found to be present within the North BSA.

# Special-Status Animals

According to the CNDDB, NMFS, and USFWS searches 38 special-status wildlife species have the potential to be in the BSA based on recorded geographical distribution. Based on habitat requirements and survey results, there is potential for 15 special-status wildlife species to be in the BSA (see **Table 9**). Based on evaluation of habitat requirements, species range, and biological reconnaissance survey results, 23 special-status wildlife species do not have potential habitat and are not expected to be in the BSA.

Table 7 Special-Status Natural Communities with Potential to be in the Biological Study Area

Common and Scientific Names	Federal Status (USFWS)	State Status (CDFW)	General Habitat Requirements	Habitat Present/ Absent	Rationale for Species Presence/Absence
Southern California Steelhead Stream		SNR	Southern California Steelhead Streams are streams with adequate flow that provide habitat for steelhead and have a connection to the ocean.	НР	Santa Paula Creek has adequate flow to provide habitat for southern California steelhead and has connectivity to the Santa Clara River which drains to the Pacific Ocean; therefore, this community is present in the North BSA and South BSA.
Southern Coast Live Oak Riparian Forest		S4	The Southern Coast Live Oak Riparian Forest community consists of open to locally dense evergreen sclerophyllous riparian woodlands dominated by coast live oak ( <i>Quercus agrifolia</i> ). The understory of this community is poorer in shrubs than other riparian communities but richer in herbs. This community is found in bottomlands and outer floodplains along larger streams, on finegrained, rich alluvium substrates.	НР	There are woodlands dominated by coast live oak within the North BSA; therefore, this community is present and is identified as <i>Quercus Agrifolia</i> Woodland Alliance vegetation community.
Southern Cottonwood-Willow Riparian Forest		S3.2	The Southern Cottonwood-Willow Riparian Forests are tall, open, broadleafed, winter-deciduous riparian forests dominated by Fremont cottonwood ( <i>Populus fremontii</i> ), black cottonwood ( <i>Populus trichocarpa</i> ), and tree willows. The understory usually consists of shrubby willows. This community is found on sub-irrigated and frequently overflowed lands along rivers and streams. The dominant species require moist, bare mineral soil for germination and establishment.	НР	There are open riparian forests dominated by Fremont cottonwoods and willow species within the North BSA; therefore, this community is present and is identified as the <i>Populus Fremontii-Quercus Agrifolia</i> Forest Alliance vegetation community.
Southern Mixed Riparian Forest		S2.1	The Southern Mixed Riparian Forests are dominated by tall cottonwoods and medium sized arroyo willow (Salix lasiolepis) and	НР	There are tall cottonwoods and medium sized arroyo willow and sycamore trees within the North BSA;

Common and Scientific Names	Federal Status (USFWS)	State Status (CDFW)	General Habitat Requirements	Habitat Present/ Absent	Rationale for Species Presence/Absence
			Goodding's willow (Salix gooddingii). The mid-story canopy layer consists of medium sized trees and tall shrubs such as sycamores and box elder. The understory consists of small shrubs.		therefore, this community is present and is identified as <i>Salix Lasiolepis</i> Shrubland Alliance vegetation community.
Southern Riparian Scrub		S3.2	The Southern Riparian Scrub community consists of streamside thickets dominated by one or more willows and mulefat ( <i>Baccharis salicifolia</i> ), as well as by other fast-growing shrubs and vines. This community is found along intermittent stream channels and requires flooding. Most plants recolonize following flood disturbance.	НР	There are streamside thickets dominated by willows and mulefat within the South BSA; therefore, this community is present and is identified as <i>Baccharis Salicifolia</i> Shrubland Alliance vegetation community.
Southern Willow Scrub		S2.1	The Southern Willow Scrub is a dense, broadleafed, winter-deciduous riparian thicket dominated by several willow species, with scattered emergent Fremont cottonwood ( <i>Populus fremontii</i> ) and California sycamore. Most stands are too dense to allow much understory development. This community is found in areas of loose, sandy, or fine gravelly alluvium soils near stream channels and requires repeated flooding.	НР	There are thickets dominated by willow species with scattered emergent cottonwood and sycamore trees in the North BSA; therefore, this community is present and is identified as the Salix Exigua Shrubland Alliance and the Salix Laevigata Woodland Alliance vegetation community.

Sources: (Holland, 1986; Sawyer, Keeler-Wolf, & Evens, 2012)

Table Key: Habitat Present (HP) = There is habitat present within the BSA. S2 = Imperiled-rarity due to very restricted range, very few populations (often 20 or fewer), steep declines, or other factors making it very vulnerable to extirpation from the nation or California; S3 = Vulnerable-restricted range, relatively few populations (often 80 or fewer), recent and widespread declines, or other factors making it vulnerable to extirpation; S4 = Apparently Secure - uncommon but not rare; some cause for long-term concern due to declines or other factors. SNR= Unranked-State conservation status not yet assessed.

Table 8 Special-Status Plants with Potential to be in the Biological Study Area

Common and Scientific Names	USFWS	CDFW	CNPS	General Habitat Requirements	Habitat Present/ Absent	Rationale for Species Presence/Absence
Baccharis plummerae ssp. plummerae Plummer's baccharis			4.3	The Plummer's baccharis is a perennial deciduous shrub found in broadleaved upland forest, chaparral, cismontane woodland, and coastal scrub. This species is found in brushy canyons and mountainsides near the sea, usually found on north-facing slopes.  Typical blooming period: May to October Typical elevation range: 16 to 1,394 feet	НР	There are areas of brushy chaparral within the BSA; therefore, although this species was not observed during the biological surveys, there is potential for this species to be in the BSA.
Calochortus fimbriatus Late-flowered mariposa- lily			1B.3	The late-flowered mariposa lily is a perennial bulbiferous herb found in chaparral, cismontane woodland, and riparian woodland often on serpentinite soils.  Typical blooming period: June to August Typical elevation range: 902 to 6,250 feet	НР	There is chaparral and riparian woodland within the BSA; therefore, although this species was not observed during the biological surveys, there is potential for this species to be in the BSA.
Calochortus plummerae Plummer's mariposa lily		S4	4.2	The Plummer's mariposa-lily is a perennial bulbiferous herb found on dry rocky slopes, brushy areas, and openings of chaparral. This species may occasionally be found in coastal scrub, valley and foothill grassland, cismontane woodland, and lower montane coniferous forest from the Santa Monica Mountains to the San Jacinto Mountains. This species prefers granitic or alluvial material and can be very common after fire.  Typical blooming period: May to July Typical elevation range: 328 to 5,577 feet	НР	There is chaparral within the BSA; therefore, although this species was not observed during the biological surveys, which were conducted during the typical blooming period for this species, there is potential for this species to be in the BSA.

Common and Scientific Names	USFWS	CDFW	CNPS	General Habitat Requirements	Habitat Present/ Absent	Rationale for Species Presence/Absence
Horkelia cuneata var. puberula Mesa horkelia	-1		1B.1	The mesa horkelia is a perennial herb found in openings in maritime chaparral, oak woodland, and coastal scrub habitat in sandy or gravelly soils. This species was historically found in Santa Barbara, Los Angeles, western Riverside, southwestern San Bernardino, and northwest San Diego counties.  Typical blooming period: February to September  Typical elevation range: 229 to 2,657 feet	НР	There is oak woodland with gravelly soils in the BSA; therefore, although this species was not observed during the biological surveys, which were conducted during the typical blooming period for this species, there is potential for this species to be in the BSA.
Juglans californica Southern California black walnut	+	S4	4.2	The southern California black walnut is a perennial deciduous tree found in canyons and alluvial habitats in chaparral, cismontane woodland, coastal scrub, and riparian woodland on slopes.  Typical blooming period: March to August Typical elevation range: 164 to 2,953 feet	НР	This species was observed during the biological surveys.
Lepidium virginicum var. robinsonii Robinson's pepper-grass	-1	S3	4.3	The Robinson's pepper-grass is an annual herb found in chaparral and coastal scrub. This species is found on dry soils.  Typical blooming period: January to July  Typical elevation range: Three to 2,904 feet	НР	There is chaparral within the BSA; therefore, although this species was not observed during the biological surveys, which were conducted during the typical blooming period for this species, there is potential for this species to be in the BSA.
Lilium humboldtii ssp. ocellatum Ocellated Humboldt lily		S4?	4.2	The ocellated Humboldt lily is a perennial bulbiferous herb found in the Central and South Coast, San Francisco Bay Area, Inner and Outer South Coast, western Transverse Ranges, Channel Islands, and	НР	There is oak and riparian woodland within the BSA; therefore, although this species was not observed during the biological surveys, which were

Common and Scientific Names	USFWS	CDFW	CNPS	General Habitat Requirements	Habitat Present/ Absent	Rationale for Species Presence/Absence
				San Bernardino and San Gabriel Mountains. This species is generally found in the understory of oak woodland in chaparral, cismontane woodland, coastal scrub, lower montane coniferous forest, and riparian woodland.  Typical blooming period: March to August Typical elevation range: 98 to 5,905 feet		conducted during the typical blooming period for this species, there is potential for this species to be in the BSA.
<i>Lupinus paynei</i> Payne's bush lupine		S1	1B.1	Payne's bush lupine is a perennial shrub found on sandy soils in coastal scrub, riparian scrub, and valley and foothill grassland.  Typical blooming period: March to July Typical elevation range: 722 to 1,378 feet	НР	There is riparian scrub and sandy soils within the BSA; therefore, although this species was not observed during the biological surveys, which were conducted during the typical blooming period for this species, there is potential for this species to be in the BSA.
Malacothamnus davidsonii Davidson's bush-mallow	ł	S2	1B.2	Davidson's bush-mallow is a perennial deciduous shrub found on sandy washes in coastal scrub, riparian woodland, chaparral, and cismontane woodland.  Typical blooming period: June to January Typical elevation range: 607 to 2,805 feet	НР	There is riparian woodland and sandy soils within the BSA; therefore, there is potential for this species to be in the BSA.
Polygala cornuta var. fishiae Fish's milkwort			4.3	The Fish's milkwort is a perennial deciduous shrub found along scree slopes, bushy ridges and creeks in chaparral, cismontane woodland, and riparian woodland. This species is often found with oaks.  Typical blooming period: May to August Typical elevation range: 328 to 3,281 feet	НР	There is riparian and oak woodland within the BSA; therefore, there is potential for this species to be in the BSA.

Bridge Road Bridge Rehabilitation and Scour Mitigation Project

Common and Scientific Names	USFWS	CDFW	CNPS	General Habitat Requirements	Habitat Present/ Absent	Rationale for Species Presence/Absence
Pseudognaphalium leucocephalum White-rabbit tobacco		S2	2B.2	The white rabbit tobacco is a perennial herb found in riparian woodland, cismontane woodland, coastal scrub, and chaparral. This species is found on sandy, gravelly benches, dry stream bottoms, canyon bottoms, arroyos, areas of oaksycamore, oak-pine, to pine woodlands, and commonly in riparian vegetation.  Typical blooming period: July to December Typical elevation range: Zero to 6,890 feet	НР	There is riparian woodland with sycamore and oak trees within the BSA; therefore, there is potential for this species to be in the BSA.

Source: (California Native Plant Society, 2018; Jepson Flora Project (eds.), 2018; eFloras, 2019; U.S. Fish and Wildlife Service, 2011)

Table Key: Habitat Present (HP) = There is habitat present within the BSA. S1 = Critically Imperiled - extreme rarity (often 5 or fewer observations) or because of some factor(s) such as very steep declines making it especially vulnerable to extirpation from California; S2 = Imperiled- rarity due to very restricted range, very few populations (often 20 or fewer), steep declines, or other factors making it very vulnerable to extirpation from the nation or California; S3 = Vulnerable- restricted range, relatively few populations (often 80 or fewer), recent and widespread declines, or other factors making it vulnerable to extirpation; S4 = Apparently Secure - uncommon but not rare; some cause for long-term concern due to declines or other factors.

California Native Plant Society (CNPS), 1B= Plant species that are rare, threatened, or endangered in California and elsewhere; 2B= Plant species that are rare, threatened, or endangered in California, but are more common elsewhere; 4 = Plants of limited distribution; 0.1=seriously threatened in California; 0.2 = moderately threatened in California; and 0.3 = Not very threatened in California.

Table 9. Special-Status Wildlife with Potential to be in the Biological Study Area

Common and Scientific Names	USFWS	CDFW	General Habitat Requirements	Habitat Present/ Absent	Rationale for Species Presence/Absence
Amphibians					
Rana draytonii California red-legged frog	FT	SSC	The California red-legged frog is found in lowlands and foothills in or near permanent sources of deep water with dense, shrubby, or emergent riparian vegetation. Suitable habitat includes freshwater ponds or streams with calm stable water, and good water quality. Seasonal water is required for up to five months to allow for egg laying, hatching and metamorphosis of tadpoles.	НР	There is a perennial creek with shrubby and emergent riparian vegetation and pools with calm water in the BSA. Therefore, there is potential for this species to be in the BSA.
Birds					
Setophaga petechia Yellow warbler		SSC	The yellow warbler is found in riparian plant associations in close proximity to water. This species also nests in montane shrubbery in open coniferous forests in the Cascades and Sierra Nevada. This species is found nesting and foraging in willow shrubs and thickets, and in other riparian plants including cottonwoods (Aigeiros sp.), sycamores (Plantanus sp.), ash (Fraxinus sp.), and alders.	HP Nesting HP Foraging	A yellow warbler was present during the biological surveys and there is riparian habitat including sycamore, cottonwood, and willow shrubs and thickets in the BSA. Therefore, there is potential for this species to forage and nest in the BSA.
Vireo bellii pusillus Least Bell's vireo	FE	SE	The least Bell's vireo is found in dense, willow dominated riparian habitat with lush understory vegetation. This species is a summer resident of southern California in low riparian areas near water or in dry river bottoms and floodplains below 2,000 feet. Nests are typically built within three to four feet off the ground in the fork of willows ( <i>Salix</i> spp.), mulefat ( <i>Baccharis salicifolia</i> ), or understory vegetation, such as California wild grape ( <i>Vitis californica</i> ).	HP Nesting HP Foraging	There is dense, willow dominated riparian habitat along the creek in the BSA. Therefore, there is potential for this species to forage and nest in the BSA.

Common and Scientific Names	USFWS	CDFW	General Habitat Requirements	Habitat Present/ Absent	Rationale for Species Presence/Absence
Fish					
<i>Gila orcuttii</i> Arroyo chub		SSC	The arroyo chub is native to streams from Malibu Creek to San Luis Rey River basin. This species was introduced into streams in Santa Clara, Ventura, Santa Ynez, Mohave, and San Diego River basins. This species is found in slow water stream sections with mud or sand bottoms, and feeds heavily on aquatic vegetation and associated invertebrates.	НР	There is a perennial creek within the BSA which contains slow water stream sections with mud or sand bottoms. Therefore, there is potential for this species to be in the BSA.
Oncorhynchus mykiss irideus pop. 10 Steelhead - Southern California DPS	FE	SCE	The southern California steelhead is found in low elevation lakes, lakes, slow-moving small to large rivers, sloughs, backwaters, reservoirs, and sluggish sandy pools. This species spawn in small streams or shallow waters.	НР	There is a perennial creek within the BSA which contains slow-moving sections of water and sandy pools. Therefore, there is potential for this species to be in the BSA.
Insects					
Bombus crotchii Crotch bumble bee		SCE	The Crotch bumble bee is found in open grassland and scrub habitats in coastal California east to the Sierra-Cascade crest and south into Mexico. This species nests underground in abandoned rodent burrows or above ground in tufts of grass, old bird nests, rockpiles, or cavities in dead trees. Food plant genera include snapdragons (Antirrhinum sp.), phacelia (Phacelia sp.), clarkia (Clarkia sp.), dendromecon (Dendromecon sp.), poppy (Eschscholzia sp.), and buckwheat (Eriogonum sp.).	НР	There are abandoned rodent burrows, rock piles, and buckwheat and phacelia species within the BSA; therefore, there is potential for this species to be in the BSA.
Mammals					
Antrozous pallidus Pallid bat		SSC	The pallid bat is found year-round in a variety of low-elevation habitats in most parts of California, including grasslands, shrub lands, woodlands, and forests. This species is thought to prefer	НР	There are trees in the BSA which could provide suitable roosting habitat for this species; therefore, there is potential for this species to be in the

Common and Scientific Names	USFWS	CDFW	General Habitat Requirements	Habitat Present/ Absent	Rationale for Species Presence/Absence
			open, dry habitats with rocky areas for roosting. This species roosts in caves, crevices, mines, hollow trees, buildings, and bridges, and night roosts in more open sites, such as porches, open buildings, and bridges. Roosts must protect bats from high temperatures, and this species will move deeper into cover if temperatures rise.		BSA
Lasiurus cinereus Hoary bat		S4	The hoary bat is found in a wide variety of habitats and elevations in California. This species generally roosts in dense foliage of medium to large trees, and prefers open habitats or habitat mosaics, with access to trees for cover and open areas or habitat edges for feeding.	НР	There are trees in the BSA, which could provide suitable roosting habitat; therefore, there is potential for this species to be in the BSA.
Reptiles	_				
<i>Anniella</i> spp. California legless lizard		SSC	The California legless lizard is found in a variety of habitats, including areas with moist, loose soil and prefers soils with a high moisture content. This species is found from Contra Costa County south to San Diego. This element represents California records of Anniella that have not yet been assigned to new species within the Anniella pulchra complex.	НР	There are loose sandy soils with high moisture content in the BSA. Therefore, there is potential for this species to be in the BSA.
Anniella stebbinsi Southern California legless lizard		SSC	The southern California legless lizard is generally found south of the Transverse Range, extending to northwestern Baja California. This species is found in a variety of habitats in sandy or loose, loamy soils with high moisture content under sparse vegetation. This species is often locally abundant with specimens found in coastal sand dunes and a variety of interior habitats, including sandy washes and alluvial fans. This species is often found in leaf litter under trees and bushes	НР	There are sandy soils with high moisture content in the BSA. In addition, there are rocky, sunny areas with leaf litter under trees and bushes and the BSA contains surface objects including rocks and logs. Therefore, there is potential for this species to be in the BSA.

Common and Scientific Names	USFWS	CDFW	General Habitat Requirements	Habitat Present/ Absent	Rationale for Species Presence/Absence
			in sunny areas and dunes stabilized with bush lupine and mock heather. The southern California legless lizard can also be found under surface objects such as rocks, boards, driftwood, and logs.		
Aspidoscelis tigris stejnegeri Coastal whiptail		SSC	The coastal whiptail is found primarily in hot and dry open areas with sparse foliage, including chaparral, woodland, and riparian areas. This species is also found in woodland and riparian areas where the ground may be firm soil, sandy, or rocky.	НР	There are mesic areas with sandy and rocky soils along the riparian portions of the BSA. Therefore, there is potential for this species to be in the BSA.
Diadophis punctatus modestus San Bernardino ringneck snake		S2	The San Bernardino ringneck snake is most commonly found in moist habitats, including wet meadows, rocky hillsides, gardens, farmland, grassland, chaparral, mixed coniferous forests, and woodlands. This species is found under surface objects along drainage courses, in mesic chaparral, and oak and walnut woodland communities. This species avoids moving through open or barren areas by restricting movements to areas of surface litter or herbaceous vegetation. This species feds on small salamanders, tadpoles, small frogs, small snakes, lizards, worms, and insects.	НР	There is oak woodland and herbaceous vegetation and leaf litter within the BSA. Therefore, there is potential for this species to be in the BSA.
Emys marmorata Western pond turtle		SSC	The western pond turtle is found in slow moving rivers, streams, lakes, ponds, wetlands, reservoirs, and brackish estuarine waters. This species prefers areas that provide logs, algae, or vegetation for cover, and boulders, partially submerged logs, vegetation mats, or open mud banks for basking.	НР	There are boulders and mud banks within the BSA. Therefore, there is potential for this species to be in the BSA.
Phrynosoma blainvillii		SSC	The coast horned lizard is found in open areas of	НР	There are open areas with sandy soil

Common and Scientific Names	USFWS	CDFW	General Habitat Requirements	Habitat Present/ Absent	Rationale for Species Presence/Absence
Coast horned lizard			sandy soil and low vegetation in valleys, foothills, and semiarid mountains. This species is also found in grasslands, coniferous forests, woodlands, and chaparral, with open areas and patches of loose soil. Preferred plant species are either chaparral or a chaparral/coastal sage scrub mix with bare ground coverage averaging 20 to 40 percent. California buckwheat ( <i>Eriogonum fasiculatum</i> ) is considered to be a primary indicator species for favorable soil and climatic conditions. Key habitat elements for this species are the presence of loose, fine soils, with a high sand content; an abundance of native ants; open areas for basking; and areas with low dense shrubs for refuge.		and low chaparral vegetation dominated by buckwheat within the BSA. Therefore, there is potential for this species to be in the BSA.
Thamnophis hammondii Two-striped gartersnake		SSC	The two-striped garter snake is found in coastal California from the vicinity of Salinas to northwest Baja California. This species is highly aquatic, found in or near permanent freshwater. This species is often found along streams with rocky beds and riparian growth.	НР	There is a perennial creek with rocky beds and riparian vegetation in the BSA. Therefore, there is potential for this species to be in the BSA.

Source: (California Department of Fish and Wildlife, 2018; California Department of Fish and Wildlife, 2019; California Herps, 2019; Cornell Lab of Ornithology, 2019; National Audubon Society, 2019)

Table Key: Habitat Present (HP): There is habitat present within the BSA. Federal Endangered (FE); Federal Threatened (FT); State Endangered (SE); State Candidate Endangered (SCE); State Species of Special Concern (SSC); S2 = Imperiled-rarity due to very restricted range, very few populations (often 20 or fewer), steep declines, or other factors making it very vulnerable to extirpation from the nation or California; S4 = Apparently Secure - uncommon but not rare; some cause for long-term concern due to declines or other factor

#### **Birds**

# Yellow Warbler

The yellow warbler is considered a SSC by CDFW. This species is found in riparian plant associations in close proximity to water. This species also nests in montane shrubbery in open coniferous forests in the Cascades and Sierra Nevada. This species is found nesting and foraging in willow shrubs and thickets, and in other riparian plants including cottonwoods, sycamores, ash (Fraxinus sp.), and alders. There are willow shrubs and thickets, as well as cottonwood, sycamore, and alder trees, for nesting and foraging. In addition, a yellow warbler was observed in the BSA during the biological survey. Therefore, this species is present in the BSA.

## Least Bell's Vireo

The least Bell's vireo is listed as endangered under the FESA and CESA. This species is found in dense, willow dominated riparian habitat with lush understory vegetation. This species primarily occupies riparian habitats that typically feature dense cover within three to seven feet of the ground and a dense, stratified canopy. There is willow dominated riparian habitat along the creek within the North BSA for nesting and foraging. Therefore, there is potential for this species to be in the BSA.

# Fish

# Arroyo Chub

The arroyo chub is considered a SSC by CDFW. This species is native to streams from Malibu Creek to San Luis Rey River basin and was introduced into streams in Santa Clara, Ventura, Santa Ynez, Mohave, and San Diego River basins. This species is found in slow water stream sections with mud or sand bottoms, and feeds heavily on aquatic vegetation and associated invertebrates. Santa Paula Creek is a perennial creek within the BSA which contains slow water stream sections with mud or sand bottoms. Therefore, there is potential for this species to be in the BSA.

# <u>Steelhead – Southern California DPS</u>

Steelhead are listed as endangered under FESA and is listed as an endangered candidate species under the CESA. Steelhead are anadromous fish that spend part of their life cycle in freshwater and part in salt water. This species spawns in small, freshwater streams where the young remain from one to several years before migrating to the ocean to feed and mature. The southern California DPS of steelhead relies on winter rains to provide passage to upstream spawning tributaries.

Santa Paula Creek is one of three main historical spawning tributaries for steelhead (Stillwater Sciences, 2006). In addition, Santa Paula Creek was designated as critical habitat for this species on September 2, 2005, (National Marine Fisheries Service, 2005); therefore, the portions of the creek within the BSAs are considered steelhead critical habitat. Creek conditions favorable to steelhead within the North and South BSA include suitable water quality and adequate natural cover such as shade, gravel bottom channel, and large rocks.

# Insects

#### Crotch Bumble Bee

The Crotch bumble bee is listed as a candidate endangered species under CESA. This species is found in open grassland and scrub habitats in coastal California east to the Sierra-Cascade crest and south into

Mexico. This species nests underground in abandoned rodent burrows or above ground in tufts of grass, old bird nests, rock piles, or cavities in dead trees. Food plant genera include snapdragons (*Antirrhinum* sp.), phacelia (*Phacelia* sp.), clarkia (*Clarkia* sp.), dendromecon (*Dendromecon* sp.), poppy (*Eschscholzia* sp.), and buckwheat (*Eriogonum* sp.). There is suitable scrubland habitat with rock piles, abandoned rodent burrows, and the preferred food plant genera, including phacelia and buckwheat species in the South BSA. Therefore, there is potential for this species to be in the BSA. However, the closest recorded observation in CNDDB is approximate seven miles to the northwest of the project area.

# **Discussion of Checklist Responses**

a. Would the project 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 CDFW or USFWS?

**Less Than Significant Impact with Mitigation Incorporated.** Based on habitat requirements and the results of the biological surveys, there is potential for 11 special-status plant species and 15 special-status wildlife species to be within the BSA (see **Table 8** and **Table 9**).

Construction activities would include grading, excavation, vegetation removal, and vehicle movement which could result in direct and indirect impacts on special-status plant species, including the southern California black walnut, should they be in the BSAs. However, the southern California black walnut is outside of the impact area and removal of the trees would not be required; therefore, direct impacts on the tree are not anticipated. Direct impacts on other special-status plant species with potential to be in the BSA could include trampling or removal of individual plants during construction activities. Indirect impacts could include increased dust levels which could result in impacts on the health of the plants, including the southern California black walnut. Avoidance and minimization measures BIO-11 and BIO-12 would be implemented to avoid and minimize indirect and direct impacts to special status species. Mitigation measure BIO-13 would be implemented if it is determined that special-status plants will be directly impacted by the project. In addition, the project would be constructed in compliance with dust control regulations. Therefore, the project would result in less than significant impacts on special status plants.

### **Amphibians**

The California red-legged frog has been observed within 10 miles of the BSA, with the closest observation approximately eight miles to the northwest in Lion Creek. No California red-legged frogs were observed in the BSA during biological surveys, including the California red-legged frog habitat assessment surveys, conducted for the project. However, there is suitable aquatic, riparian, and woodland habitat in the BSA for aestivation and dispersal. Therefore, the potential for this species to be in the BSA cannot be ruled out, and the presence of the California red-legged frog in the BSA is inferred. The project is outside of designated California red-legged frog critical habitat.

Construction activities would include grading, excavation, vegetation removal, and vehicle movement, which could result in direct and indirect impacts on special-status amphibians, including the California red-legged frog, should they be in the project area. Direct impacts on special-status amphibians could include being trampled or crushed by vehicles or equipment. Indirect impacts could include earthwork, vegetation removal, installation of water diversion, and installation of the temporary creek crossing which could result in temporary reduction in aestivation and dispersal habitat for California red-legged frog. In addition, although presence of the California red-legged frog in the BSA is inferred, there is a low potential for encountering the species during construction.

The project would be constructed in compliance with dust control regulations. In addition, with the implementation of avoidance and minimization measures **BIO-14** through **BIO-32** impacts on the California red-legged frog, are not anticipated. Therefore, with implementation of avoidance and minimization measures the project would result in a less than significant impact on special-status amphibians.

#### **Birds**

Construction activities would include grading, excavation, vegetation removal, and vehicle movement which could result in direct and indirect impacts on birds should they be in the BSA. Direct impacts on birds could include tree removal, which could result in mortality and/or nest destruction. Indirect impacts could include increased noise, vibration, and human activity during construction activities, which could result in disturbance, disruption of foraging, and/or nest abandonment. Although presence of the least Bell's vireo in the BSA is inferred, there is a low potential for encountering the species during construction. With the implementation of avoidance and minimization measures BIO-8, BIO-14, BIO-16 through BIO-20, BIO-33 through BIO-35, the project would result in a less than significant impact on special-status birds.

#### Fish

Construction activities would include drilling of piles, vegetation removal, installation of a water diversion, and vehicle movement which could result in direct and indirect impacts on special-status fish, including the southern California steelhead, should they be in the project area. Direct impacts on special-status fish could include being caught, crushed, or trampled during installation of the water diversion or temporary creek crossing. Indirect impacts could include earthwork, vegetation removal, installation of water diversion, and installation of the temporary creek crossing which could result in increased turbidity, increased risk for erosion and sediments entering the creek, and reduction in shade which could alter water temperature and water quality within the North and South BSA. Although presence of southern California steelhead is being inferred, because in-water work is anticipated, the project may result in take (harm, harass, or mortality) of southern California steelhead; therefore, the project may potentially impact southern California steelhead. However, with the implementation of avoidance and minimization measures BIO-15 through BIO-18 and BIO-36 through BIO-38, impacts on the arroyo chub and southern California steelhead would be less than significant.

# <u>Steelhead – Southern California DPS Critical Habitat</u>

Construction materials, dust, and debris could result in temporary indirect impacts on southern California steelhead critical habitat, if material were to enter flowing water in the creek during the installation of the secant pile wall. In addition, installation of the water diversion in the North BSA and temporary creek crossing in the South BSA could result in direct impacts on the creek bed by disrupting the existing substrate. After construction is complete, the creek channel would be restored to previous contours, to the extent feasible. With the implementation of avoidance and minimization measures **BIO-36** through **BIO-38** impacts on southern California steelhead critical habitat would be less than significant.

#### Insects

Construction activities would include grading, excavation, vegetation removal, and vehicle movement which could result in direct and indirect impacts on special-status insects, including the Crotch bumble bee, should they be in the BSA. Direct impacts on special-status insects could include trampling or crushing, resulting in mortality. Indirect impacts could include increased noise, vibration, and human

activity during construction activities, which could result in disturbance and disruption of foraging. However, with the implementation of avoidance and minimization measures **BIO-14** through **BIO-20** and **BIO-39** through **BIO-41** the project would result in a less than significant impact on the insects.

#### **Mammals**

Construction activities would include grading, excavation, vegetation removal, and vehicle movement which could result in direct and indirect impacts on bats should they be in the BSA. Direct impacts on bats could include tree removal, which could result in mortality and/or roost abandonment. Indirect impacts could include increased noise, vibration, and human activity during construction activities, which could result in disturbance and/or roost abandonment. However, with the implementation of avoidance and minimization measures BIO-14 through BIO-20 and BIO-42 through BIO-46, the project would result in a less than significant impact on bats.

### Reptiles

Construction activities would include grading, excavation, vegetation removal, and vehicle movement which could result in direct and indirect impacts on special-status reptiles should they be in the BSA. Direct impacts on special-status reptiles could include trampling or crushing by construction equipment, resulting in mortality. Indirect impacts could include increased noise, vibration, and human activity during construction activities, which could result in disturbance. However, with the implementation of avoidance and minimization measure **BIO-14** through **BIO-20** and **BIO-47**, the project would result in a less than significant impact on reptiles.

The project could result in direct or indirect impacts on special-status species listed in **Table 8** and **Table 9**. However, with implementation of avoidance, minimization, and mitigation measures **BIO-8**, **BIO-11** through **BIO-47** as well as consultation with the USFWS and any necessary follow-up actions, the project would result in less than significant impacts with mitigation incorporated on special-status wildlife species.

b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by CDFW or USFWS?

Less Than Significant Impact with Mitigation Incorporated. There are six special status natural communities within the BSA. Construction activities including drilling of piles, grading, vegetation removal, and vehicle movement could result in temporary impacts on special-status natural communities. Temporary impacts could include vegetation removal, diversion of water in the creek, and disturbing soils along the banks. In addition, construction materials, dust, and/or debris entering flowing waters could temporarily impact water quality within natural communities within or adjacent to the project area. No permanent impacts on special-status natural communities are anticipated (see **Table 10**). In addition, with the implementation of measures **BIO-8** through **BIO-10**, the project would result in less than significant impacts with mitigation incorporated on special-status natural communities.

**Table 10 Permanent Impacts on Sensitive Natural Communities** 

Vegetation Community	Temporary Impacts (acres)
Bromus Diandrus Herbaceous Semi-Natural Association	0.009
Quercus Agrifolia Woodland Alliance (Coastal Live Oak Woodland)	0.116
Salix Exigua shrubland Alliance (Sandbar Willow Thickets)	0.027
Salix Laevagata Woodland Alliance (Red Willow Thickets)	0.061
Salix Lasiolepis Shrubland Alliance (Arroyo Willow Thickets)	0.059
Woody Horticultural Crop Cultural Formation	0.024

c. Have a substantial adverse effect on state or federally protected wetlands (including but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Less Than Significant Impact with Mitigation Incorporated. Construction activities would include drilling of piles, grading, vegetation removal, and vehicle movement, which could result in temporary impacts on jurisdictional features. Temporary impacts could include vegetation removal, diversion of water in the creek, and disturbing soils along the banks. In addition, construction materials, dust, and/or debris entering flowing waters could temporarily impact water quality. (see Table 11, Figure 6, and Figure 7). However, with the implementation of measures BIO-1 through BIO-8, the project would result in less than significant impacts with mitigation incorporated.

Table 11. Temporary Impacts on Jurisdictional Features in the BSA

Regulatory Agency and Jurisdiction	Temporary Impacts (acres)
United States Army Corps of Engineers Wetlands	0.001
United States Army Corps of Engineers Non-Wetland Waters	0.154
Regional Water Quality Control Board Wetlands	0.001
Regional Water Quality Control Board Non-Wetland Waters	0.154
California Department of Fish and Wildlife Jurisdiction	0.687

d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Less Than Significant Impact with Mitigation Incorporated. According to the CDFW BIOS, the BSA falls within the Santa Monica-Sierra Madre Connection (Paulman, 2009) and the closest natural landscape block is approximately 2.7 miles west of the BSA (Rustigian-Romsos, 2017). The Santa Monica-Sierra Madre Connection encompasses habitats between the Santa Monica Mountains National Recreation Area and Los Padres National Forest which allows for movement of 20 focal species, including but not limited to, mountain lion (*Puma concolor*), loggerhead shrike (*Lanius Iudovicianus*), western toad (*Bufo boreas*), and southern steelhead (*Oncorhynchus mykiss mykiss*), (Paulman, 2009). Therefore, there is potential for the BSA to be used as a migration or travel corridor. In addition, the BSA may be used for local foraging and movement by urban wildlife species in the area.

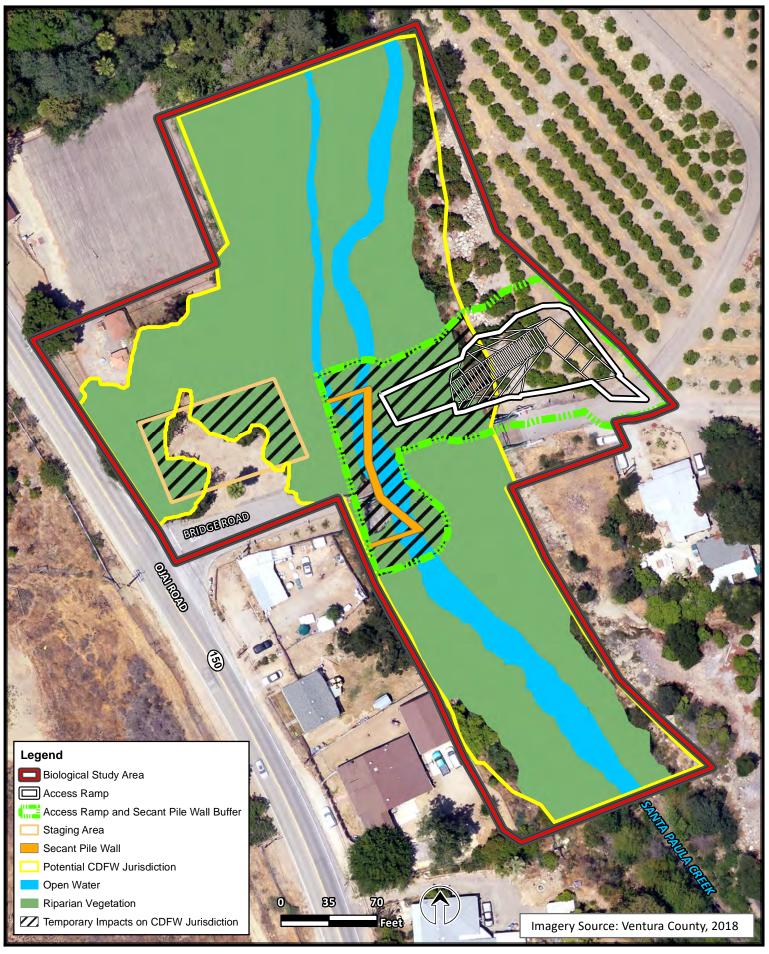




FIGURE 6A. IMPACTS ON POTENTIAL CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE (CDFW) JURISDICTION Bridge Road Bridge Rehabilitation and Scour Mitigation Project

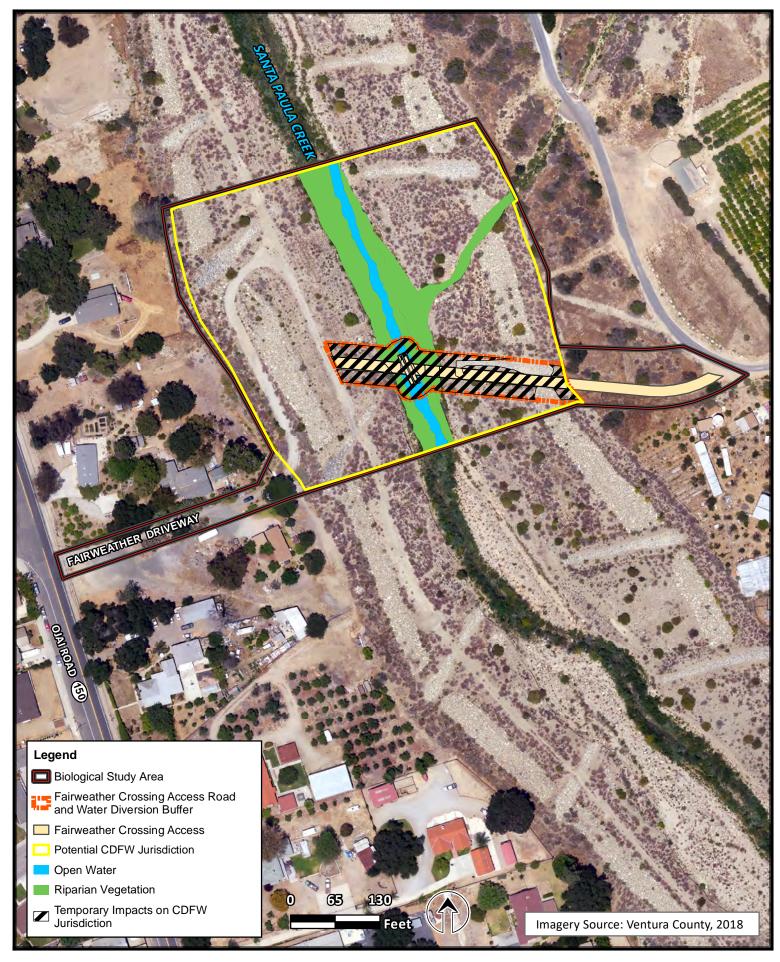




FIGURE 6B. IMPACTS ON POTENTIAL CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE (CDFW) JURISDICTION Bridge Road Bridge Rehabilitation and Scour Mitigation Project

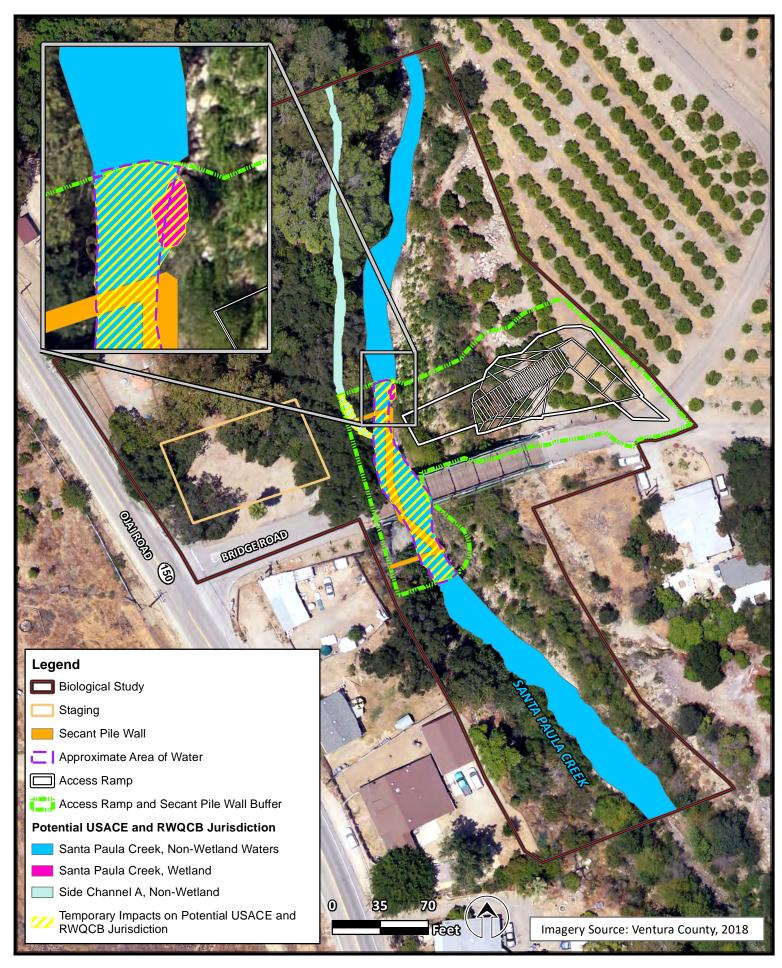




FIGURE 7A. IMPACTS ON POTENTIAL UNITED STATES ARMY CORPS OF ENGINEERS (USACE) AND REGIONAL WATER QUALITY CONTROL BOARD (RWQCB) JURISDICTION Bridge Road Bridge Rehabilitation and Scour Mitigation Project

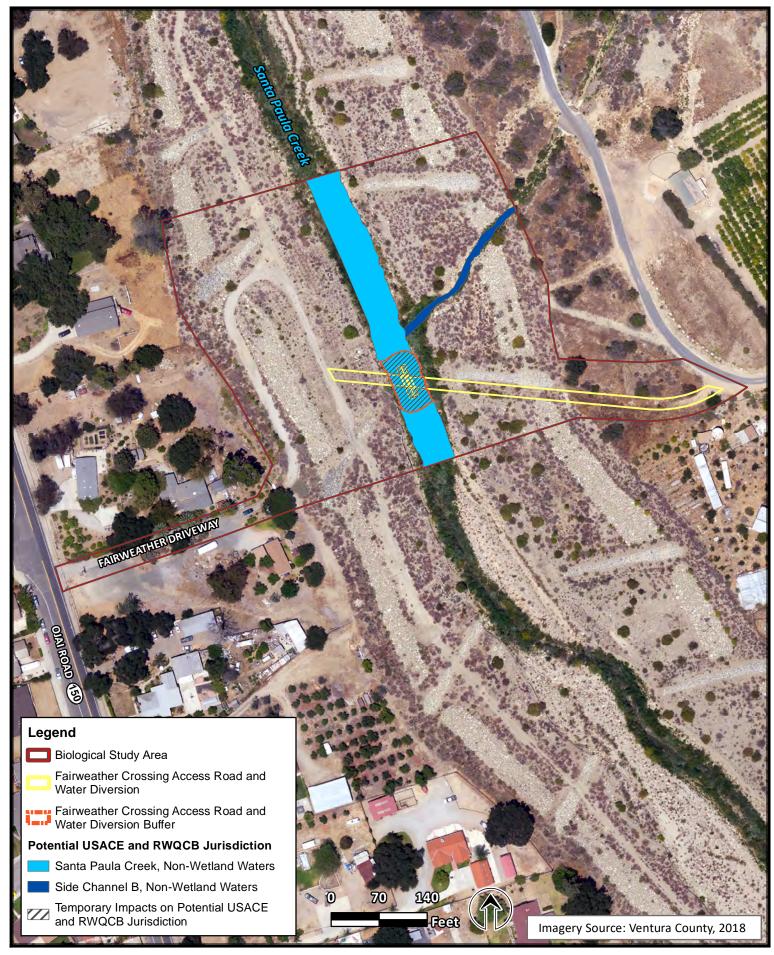




FIGURE 7B. IMPACTS ON POTENTIAL UNITED STATES ARMY CORPS OF ENGINEERS (USACE) AND REGIONAL WATER QUALITY CONTROL BOARD (RWQCB) JURISDICTION Bridge Rehabilitation and Scour Mitigation Project

There is potential for migratory birds to be nesting and foraging in the BSAs during construction. During the biological survey, bird species were observed foraging in or flying over the BSA, including but not limited to California scrub jay (*Aphelocoma californica*), red-tailed hawk (*Buteo jamaicensis*), Pacific slope flycatcher (*Empidonax difficilis*), black-headed grosbeak (*Pheucticus melanocephalus*), white-breasted nuthatch (*Sitta carolinensis*), and California thrasher (*Toxostoma redivivum*). Nesting birds could be directly impacted by construction activities if they were to be nesting in structures or vegetation within the construction area. In addition, these species could be indirectly impacted by loss of habitat resulting from vegetation or structure removal. However, with implementation of measures **BIO-8**, **BIO-14** through **BIO-18**, **BIO 31** through **BIO-33**, **NOI-1** and **NOI-2**, the project would be in compliance with the MBTA and California Fish and Game Code.

Construction activities would include grading, excavation, vegetation removal, and vehicle movement which could result in direct and indirect impacts on bats should they be in the BSA. Direct impacts on bats could include tree removal, which could result in mortality and/or roost abandonment. Indirect impacts could include increased noise, vibration, and human activity during construction activities, which could result in disturbance and/or roost abandonment. However, with the implementation of avoidance and minimization measures BIO-14 through BIO-18, BIO-40 through BIO-44, NOI-1 and NOI-2, the project would result in a less than significant impact on bat species.

The project would include the rehabilitation of an existing bridge, which would not result in the construction of any additional barriers that could cause fragmentation of existing habitat. The BSA may be used for local foraging, nesting, and movement by local wildlife species from the surrounding areas but is not considered a wildlife corridor; the project would therefore result in a less than significant impact with mitigation incorporated on migratory wildlife and wildlife nursery sites.

# e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Less Than Significant Impact. County Municipal Code Section 8107.25 Tree Protection Regulations establishes standards for altering or removing trees within public and private property in all unincorporated areas Ventura County. Protected trees include, but are not limited to, alder (Alnus sp.), cottonwood (*Populus sp.*), oak (*Quercus sp.*), and sycamore (*Platanus sp.*) trees. All historic and heritage trees are protected regardless of species or size. With the exception of limited trimming of small limbs, a permit is required from the County to remove, trim branches or roots, and grade or excavate within the root zone of a protected tree. The project would be constructed in compliance with dust control regulations and with implementation of the following avoidance and minimization measures **BIO 11** through **BIO 13**. Therefore, the project result in a less than significant impact on protected trees.

# f. Conflict with the provisions of an adopted Habitat Conservation Plan (HCP); Natural Community Conservation Plan; or other approved local, regional, or state HCP?

**No Impact.** The BSA is not located within the limits of a regional conservation plan such as an HCP or Natural Community Conservation Plan; therefore, the project would not conflict with the provisions of an adopted HCP; Natural Community Conservation Plan; or other approved local, regional, or state HCP. Thus, the project would result in no impact related to conflicting with an adopted HCP.

# Avoidance, Minimization, and Mitigation Measures

To avoid and/or minimize potential impacts on jurisdictional features, the following measures would be

#### implemented:

- **BIO-1** Work areas would be reduced to the maximum extent feasible.
- **BIO-2** Equipment staging and storage areas for vehicles, equipment, material, fuels, lubricants, and solvents would be restricted to designated areas and would be a minimum of 50 feet from Santa Paula Creek, Side Channel A, and Side Channel B.
- **BIO-3** Best Management Practices (BMP), such as silt fencing, fiber rolls, straw bales, or other measures would be implemented during construction to minimize dust, dirt, and construction debris from entering the jurisdictional features, and/or leaving the construction area.
- **BIO-4** Appropriate hazardous material BMPs would be implemented to reduce the potential for chemical spills or contaminant releases into the jurisdictional features including any non-stormwater discharge.
- BIO-5 All equipment refueling, and maintenance would be conducted in the staging area away from Santa Paula Creek, Side Channel A, and Side Channel B. In addition, vehicles and equipment would be checked daily for fluid and fuel leaks, and drip pans would be placed under all equipment that is parked and not in operation. Any leaking vehicle or equipment would not be operated in the project area until repaired. All workers would be informed of the importance of preventing spills and the appropriate measures to take should a spill happen.
- **BIO-6** Stationary equipment such as motors, pumps, generators, compressors, and welders located within 100 feet of the jurisdictional features would be positioned over drip-pans, including when in operation.
- **BIO-7** Any temporary erosion control implemented during construction would be completed using non-invasive species. At project completion, all temporarily disturbed areas would be re-contoured to pre-construction conditions.
- **BIO-8** Mitigation for temporary impacts on riparian habitat will be accomplished through on-site revegetation at a minimum ratio of 1:1 or through the removal of invasive species. However, the final ratio will be established through consultation and coordination with regulatory agencies during the permitting process.

To avoid and/or minimize potential impacts on special-status natural communities, the following measures would be implemented:

- **BIO-9** Vegetation removal would be avoided to the maximum extent feasible.
- **BIO-10** Prior to construction, high visibility Environmentally Sensitive Area (ESA) protective fencing would be installed at the limits of construction to prevent construction staff or equipment from encroaching further into the adjacent natural communities.

To avoid and/or minimize impacts on special-status plants, the following measures would be implemented:

**BIO-11** Prior to construction, a qualified biologist would conduct plant surveys within the construction area. Surveys would be conducted during the appropriate blooming period (June) in the year prior

to construction for species with potential to be in the construction area, to the extent feasible. If special-status plant species are found during pre-construction surveys, high visibility ESA protective fencing would be installed around the special-status plants to prevent construction staff or equipment from entering this area, to the maximum extent feasible. The ESA protective fencing buffer would be species specific, with a minimum buffer radius based on the guidance from a qualified biologist.

**BIO-12** All project-related vehicle traffic would be restricted to established roads and construction areas, which include equipment staging, storage, parking, and stockpile areas.

To mitigate for impacts on special-status plants, the following measure will be implemented:

**BIO-13** If it is determined that special-status plants will be directly impacted by the project, a species-specific mitigation plan will be prepared by a qualified biologist. The plan may include one or more of the following: plant relocation, seed collection and dispersal, on or off-site restoration, or payment into an agency-approved mitigation bank. The plan will be implemented prior to the completion of the project.

To avoid and/or minimize impacts for special-status wildlife species, the following measures would be implemented:

- **BIO-14** Pre-construction wildlife surveys would be conducted within 48 hours prior to the start of construction, including clearing and grubbing. If wildlife species are observed, they would be allowed to leave the area or relocated to a suitable location outside of the project limits prior to initiating work.
- **BIO-15** Prior to construction, a species-specific list (or plan) would be prepared identifying methods for proper handling and relocation and a map of suitable and safe relocation areas.
- **BIO-16** A qualified biologist would conduct biological monitoring during any activities involving vegetation clearing (including ruderal areas), open ditches or pits, or modification of natural habitat. If special-status species are detected, the location would be mapped and photographed and reported to the California Natural Diversity Database.
- **BIO-17** Vegetation removal would be conducted systematically, starting in the middle of the construction zone, to prevent wildlife from being trapped in vegetation "islands."
- **BIO-18** If wildlife is detected during construction, it would be allowed to move away on its own (non-invasive, passive relocation), or relocated to adjacent appropriate habitat on site or to suitable habitat adjacent to the project area.
- **BIO-19** Use of muffler equipment. Construction equipment shall be operated with standard factory silencer and/or muffler equipment. Equipment engine covers shall be in place and mufflers shall be in proper working order.
- **BIO-20** Locate haul routes away from sensitive receptors. Haul routes, staging areas, and construction activities shall be located to avoid noise impacts to sensitive receptors (schools, hospitals,

residential areas, wildlife, etc.), whenever possible. If necessary, noise curtains or shields shall be implemented to reduce noise levels to the extent feasible.

To avoid and/or minimize impacts on the California red-legged frog, the following measures would be implemented:

- **BIO-21** Pre-construction amphibian surveys would be conducted two weeks prior to start of construction by a qualified biologist.
- BIO-22 If the California red-legged frog is found in the construction area, the encounter would be treated on a case-by-case basis in coordination with regulatory agencies, but the general procedure would be as follows: (1) work would immediately be suspended in the vicinity of the animal; (2) a qualified biologist would evaluate the animal; (3) the animal would not be disturbed if it is not in danger and would be allowed to exit the construction site on its own.
- **BIO-23** Prior to the initiation of any work, including installation of exclusion fencing or clearing and grubbing activities, a qualified biologist would conduct an environmental worker awareness training for all project personnel. The training would discuss the sensitive habitats and special-status species with the potential to be within the project area and would review the project's avoidance and minimization measures, and permitting conditions associated with biological resources.
- BIO-24 Following completion of pre-construction surveys, wildlife exclusion fencing would be erected around the entire construction area, including on the creek banks, to prohibit wildlife from entering the active project area. Wildlife exclusion fencing would consist of construction grade polypropylene or similar fabric. The exclusion fencing would be a minimum of three feet tall above ground and be buried a minimum of four inches underground, when feasible, with the base folded, so wildlife cannot burrow beneath or create entry points. The exclusion fencing would remain in place throughout the duration of construction activities and would be inspected weekly and maintained in good working order by the construction contractor, under the direction of the Project Engineer and with the guidance of a qualified biologist. The exclusion fencing would be periodically inspected for trapped wildlife by a qualified biologist. The fencing would be completely removed following construction.
- **BIO-25** Initial ground-disturbing activities would be avoided between November 1 and March 31, which is when California red-legged frogs are most likely to be moving through upland areas.
- **BIO-26** Following completion of daily work activities, any temporary breaks in the wildlife exclusion fencing to allow for construction would be restored. Any temporary breaks in the wildlife exclusion fencing would be conducted under the supervision of the Project Engineer and under the guidance of a qualified biologist.
- **BIO-27** Materials stored on-site that could provide shelter for California red-legged frog, such as on-site storage of pipes, conduits, and other materials, would be placed in an open-top trailer to elevate materials off the ground.

- **BIO-28** Trenches or pits one foot or deeper that are left unfilled for more than 48 hours would be securely covered with boards or other similar material to prevent entrapment of California red-legged frog.
- BIO-29 No construction activities would be allowed during measurable rainfall or within 24-hours following rainfall with precipitation greater than ¼ inch. Prior to construction activities resuming, a qualified biologist would inspect the construction area and all equipment/materials for the presence of the California red-legged frog.
- **BIO-30** Take or suspected take of listed wildlife species would be reported immediately to a qualified biologist. A qualified biologist would be required to report the incident, or suspected incident, to the wildlife agencies within 24 hours.
- **BIO-31** No pets would be allowed in the construction area, to avoid and minimize the potential for harassment, injury, and death of wildlife.
- **BIO-32** Plastic monofilament netting, or similar material in any form, would not be used at the construction area.

To avoid and/or minimize impacts on yellow warbler and least Bell's vireo, the following measures would be implemented:

- **BIO-33** Trimming and removal of vegetation and trees would be minimized and performed outside of the nesting season (February 15 to August 31), to the extent feasible.
- BIO-34 In the event that trimming, or removal of vegetation and trees must be conducted during the nesting season, nesting bird surveys would be completed within 500 feet of the construction area, as feasible, by a qualified biologist no more than 48 hours prior to trimming or clearing activities to determine if nesting birds are within the vegetation that would be trimmed or removed. Nesting bird surveys would be repeated if trimming or removal activities are suspended for five days or more.
- **BIO-35** If nesting birds are found within 500 feet of the construction area, appropriate buffers (typically 300 feet for birds and 500 feet for raptors) consisting of orange flagging/fencing or similar would be installed and maintained until nesting activity has ended, as determined in coordination with a qualified biologist and regulatory agencies, as appropriate.

To avoid and/or minimize impacts on the arroyo chub and southern California steelhead, the following measures would be implemented:

- BIO-36 Construction within Santa Paula Creek would be limited to between June 15 and October 15.
- **BIO-37** A qualified biologist approved by NMFS and CDFW would be onsite during construction activities that could impact the federally listed fish species. The biologist would provide on-site guidance to limit disturbance to the species and its habitat.
- **BIO-38** Any temporary or permanent structure/culvert placed within a waterway where fish have potential to be present would be designed, constructed, and maintained such that they would not

constitute a barrier to upstream or downstream movement of aquatic life or cause an avoidance reaction by fish that impedes their upstream or downstream movement. This would include, but would not be limited to, the supply of water at an appropriate depth, temperature, and velocity to facilitate upstream and downstream fish migration.

To avoid and/or minimize impacts on Crotch bumble bee, the following measures would be implemented:

- **BIO-39** A qualified biologist would conduct visual surveys of the North and South BSA during the flight season for the Crotch bumble bee (late February through late October). Between two and four evenly spaced surveys would be completed for the highest detection probability, including surveys in early spring (late March/early April) and early summer (late June/July). Surveys would take place when temperatures are above 60 degrees Fahrenheit, preferably on sunny days with low wind speeds.
- BIO-40 If surveys cannot be completed, all small mammal burrows and thatched/bunched grasses would be avoided by a minimum of 50 feet to avoid take and potentially significant impacts. If ground disturbing activities would occur during the overwintering period (October through February), consultation with CDFW would be conducted to discuss how to implement project activities and avoid take. If Crotch bumble bee are detected prior to or during project implementation, consultation with CDFW would be conducted to discuss how to avoid take.
- **BIO-41** If take of Crotch bumble bee cannot be avoided, take authorization prior to any ground-disturbing activities would be conducted. Take authorization would be completed through the issuance of an Incidental Take Permit, pursuant to California Fish and Game Code 2081(b).

To avoid and minimize impacts on special-status bat species, the following avoidance and minimization measures would be implemented:

- **BIO-42** Where feasible, tree removal would be conducted outside of the maternal and non-active seasons for bats (October).
- **BIO-43** During the summer months (June to August) prior to construction, an evening emergence survey would be conducted for all identified roosting habitat to assess the presence of day-roosting bats. If presence of a roost is detected, a count and species analysis would be completed to help assess the type of colony and usage.
- BIO-44 If the presence or absence of bats cannot be confirmed in potential roosting habitat, a qualified biologist would be onsite during removal or disturbance of this habitat. If the biologist determines that bats are being disturbed during this work, work would be suspended until bats have left the vicinity on their own or can be safely excluded under direction of the biologist. Work would resume only once all bats have left the site and/or approval to resume work is given by a qualified biologist.
- BIO-45 After completion of the bat roosting habitat assessment, all trees with potential day roosting habitat would be removed using a 2-step process over two consecutive days and under the supervision of a qualified biologist. On the first day, all non-habitat trees adjacent to and/or surrounding potential habitat trees, as identified by the qualified biologist, would be removed (or

trimmed, if full removal can be avoided) using hand tools. In addition, limited trimming of the potential bat roosting habitat trees (branches and small limbs with no potential roosting features) would be completed on the first day, also using hand tools. On the second day, all of the potential habitat trees that were previously trimmed and/or avoided during step one would be removed.

BIO-46 In the event that a maternal colony of bats is found, no work would be conducted within 100 feet of the maternal roosting site until the maternal season is finished or the bats have left the site, or as otherwise directed by a qualified biologist. The site would be designated as a sensitive area and protected as such until the bats have left the site. No activities would be authorized adjacent to the roosting site. Combustion equipment, such as generators, pumps, and vehicles, would not be parked or operated under or adjacent to the roosting site. Construction personnel would not be authorized to enter areas beneath the colony, especially during the evening exodus (typically between 15 minutes prior to sunset and one hour following sunset).

To avoid and/or minimize potential impacts on special-status reptiles, the following measures would be implemented:

BIO-47 Pre-construction surveys for special-status reptiles would be conducted by a qualified biologist no more than 24 hours prior to construction. Surveys would be repeated if construction activities are suspended for five days or more. If these species, or other non-special status reptiles, are observed within the construction area, a qualified biologist would capture and relocate them to suitable habitat at least 100 feet outside of the construction area.

# 5. Cultural Resources

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact	
Wo	Would the Project:					
a.	Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?			$\boxtimes$		
b.	Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?			$\boxtimes$		
c.	Disturb any human remains, including those interred outside of formal cemeteries?			$\boxtimes$		

## **Environmental Setting**

#### **Historical Resources**

A Historical Resources Evaluation Report (HRER) was prepared by GPA Consulting in accordance with the first amended *Section 106 Programmatic Agreement Among the Federal Highway Administration, the Advisory Council on Historic Preservation, the California State Historic Preservation Officer, and the California Department of Transportation Regarding Compliance with Section 106 of the National Historic Preservation Act as it pertains to the Administration of the Federal-Aid Highway Program in California (PA), dated January 1, 2014 (Section 106 PA). Properties located within the Area of Potential Effects (APE) were identified and formally evaluated for inclusion in the NRHP. GPA Consulting also addressed compliance under California state law for the proposed undertaking in accordance with the CEQA Guidelines located at Title 14 CCR §15064.5 and Public Resources Code (PRC) 5024, using the criteria for inclusion in the California Register of Historical Resources (CRHR).* 

A records search was initially conducted at the South Central Coastal Information Center in March 2016 by Duke Cultural Resources Management (CRM) for a previous iteration of the project and updated in February 2021. The purpose of the records search was to determine the proximity of previously documented cultural resources to the project area. Sources consulted included the NRHP, the CRHR, the California Inventory of Historic Resources, the California Historical Landmarks list, the California Points of Historical Interest list, the Caltrans Statewide Historic Bridge Inventory, and records from the State Office of Historic Preservation.

The 2016 records search included a review of all recorded historic and prehistoric archeological sites located within a 0.5 mile radius around the project area. It also included a review of known cultural resource survey and excavation reports. As a result of the records search, seven reports were found within the Area of Potential Effects (APE) or half-mile search radius. Four reports consist of large area studies that encompassed the project area. One study fell just outside the 0.5 mile search radius, and one fell just within the 0.5 mile radius but is outside the project area.

There were seven properties identified within the APE. Six properties in the APE were exempt from evaluation under the Section 106 PA and required no further evaluation for historic significance. One of the six properties required evaluated in the HRER prepared for the project. The evaluation found that it is not eligible for the NRHP due to lack of historic or architectural significance. It is not considered a historic

property for the purpose of Section 106 compliance. In addition, one resource within the APE that had been previously determined eligible for the NRHP was Bridge Road Bridge, a 30-foot long single-land steel truss bridge, built in 1911 and moved in 1941.

Bridge Road Bridge (Bridge #52C-0053) was evaluated by Caltrans as part of the Statewide Historic Bridge Inventory in 1984-1986. It is listed as a Category Two bridge, which indicates it is eligible for listing in the NRHP. It was not re-evaluated as part of this project because the condition of the bridge has not changed since its prior evaluation. It is considered eligible for the NRHP and is a historic property for the purpose of Section 106 compliance. The bridge is also eligible for listing in the CRHR and is considered a historical resource for the purpose of complying with CEQA (GPA Consulting, 2021a).

# **Cultural and Archeological Resources**

An Archaeological Survey Report (ASR) was carried out in a manner consistent with Caltrans' regulatory responsibilities pursuant to the January 2014 First Amended Programmatic Agreement among the Federal Highway Administration, the Advisory Council on Historic Preservation, the California State Historic Preservation Officer, and the California Department of Transportation regarding Compliance with Section 106 of the National Historic Preservation Act, as it Pertains to the Administration of the Federal-Aid Highway Program in California (Section 106 PA). The study was also completed in accordance with Section 15064.5(a)(2)-(3) of the CEQA Guidelines, using the criteria outlined in Section 5024 of the California Public Resources Code (PRC).

A field survey of the APE was completed by DUKE CRM staff archaeologist on February 26, 2021. A single cultural resource was found within the APE as a result of background research and pedestrian survey, Bridge Road Bridge. Analysis of geology, soils, and background cultural research indicate the portions of the APE outside the drainage are moderately sensitive for the presence of cultural resources. However, the portion of the APE subject to direct disturbance from project implementation is unlikely to contain previously unidentified cultural resources given that the area has previously been disturbed. Cultural resources monitoring was not recommended (GPA Consulting, 2021b).

The records search identified six cultural resources and 12 archaeological studies within 0.5 mile of the APE. The records search indicated that, aside from the Bridge Road Bridge no other previously recorded cultural resources are located within the APE. However, two cultural resource sites are mapped directly adjacent to the APE (within 50 feet). One of the cultural resource sites mapped contained a displaced boulder with a grinding slick and mortar. The second site contained a light scatter of marine shell. However, during surveys of the APE and surrounding area, these sites were not observed, and it was determined that any previously recorded prehistoric archaeological sites adjacent to the APE are assumed to no longer be present. Besides Bridge Road Bridge, there are no prehistoric or historic archaeological resources were discovered within the direct APE as a result of background research and field survey.

# **Discussion of Checklist Responses**

a. Would the project cause a substantial adverse change in the significance of a historical resource, pursuant to Section 15064?

**Less Than Significant Impact.** There are eight previously recorded resources that have been identified within the 0.5 mile records search radius. Six of the properties were exempt from evaluation under the Section 106 PA and required no further evaluation for historic significance. One property was evaluated and found to not have eligible for the NRHP or CRHR. Bridge Road Bridge was previously found eligible for

the NRHP. However, the project includes rehabilitation of the historical bridge through the replacement and rehabilitation of foundation elements and would not adversely change the bridge (GPA Consulting, 2021a). Avoidance and minimization measure **CUL-1** would be implemented as part of the project if previously unidentified resources are uncovered. Therefore, the project would result in a less than significant impact on historical resources.

# b. Would the project cause a substantial adverse change in the significance of an archaeological resource, pursuant to Section 15064?

Less Than Significant Impact. The records search identified 12 archaeological studies within 0.5 mile of the APE. However, after a field survey, it was concluded that previously recorded prehistoric archaeological sites were most likely destroyed or removed from their original location. Due to the nature of previous ground disturbances within the APE for the construction of both Bridge Road Bridge and Bridge Road the relatively small amount of new horizontal ground disturbances, there remains a small potential to encounter previously unidentified archaeological deposits during construction of the project (GPA Consulting, 2021b). With the implementation of the proposed avoidance and minimization measure CUL-1, the project would result in a less than significant impact on archeological resources.

# c. Would the project disturb any human remains, including those interred outside of formal cemeteries?

Less Than Significant Impact. The project is located in a rural portion of the county that is not near or within a former cemetery and the land surrounding and within the project area has already been disturbed and developed. However, construction of the project would include ground-disturbing activities that could unearth previously undiscovered human remains interred outside of a former cemetery. Should they be present in the project area, avoidance and minimization measure **CUL-2** would be implemented. Therefore, the project would result in a less than significant impact on human remains.

#### Avoidance, Minimization, and/or Mitigation Measures

- **CUL-1** If previously unidentified cultural materials are encountered or unearthed during construction, work would be halted in that area until a qualified archaeologist can assess the nature and significance of the find. Additional surveys would be required if the project limits change to include areas not previously surveyed.
- CUL-2 In the event of the accidental discovery or recognition of any human remains in any location other than a dedicated cemetery, steps would be taken in compliance with the CCR Section 15064.5. All construction activities would cease, and the County Coroner would be contacted if any human remains are discovered, in accordance with 14 CCR Section 15064.5(e). If the coroner determines that the human remains are of Native American origin, the NAHC would be notified to determine the MLD for the area. The MLD would make recommendations for the arrangements for the human remains per PRC Section 5097.98.

# 6. Energy

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than- Significant Impact	No Impact
Wo	ould the Project:				
a.	Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?			$\boxtimes$	
b.	Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?				×

## **Environmental Setting**

The project area includes an existing transportation facility and a creek. The project area does not currently require energy resources to operate.

# Ventura County General Pan

As outlined in the Public Facilities, Service, and Infrastructure Element of the General Plan, the County would implement energy conservation through design features during construction (Ventura County, 2020).

#### Goals:

To be a regional leader in energy efficiency.

## **Policies:**

• The County shall prioritize energy efficiency and water conservation as key design features when constructing, purchasing, leasing, retrofitting or expanding County facilities.

## **Discussion of Checklist Responses**

a. Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?
 Less Than Significant Impact. The project area is within an existing roadway. During the four month construction period, construction vehicles, worker vehicles, and equipment (e.g., generators) would require the use of fuel (gasoline and diesel) and electricity to operate.

Equipment used during construction and construction would be compliant with California Air Resources Board (CARB) Standards. Compliance with CARB emission standards and state anti-idling regulations would minimize wasteful or inefficient energy consumption during construction. The project would be constructed in compliance with applicable CARB regulations regarding retrofitting, repowering, or replacing diesel off-road construction equipment. In addition, project construction would comply with state regulations (CCR Title 13, Motor Vehicles, Section 2449(d)(3)) that limit the construction vehicle idling times to no more than five minutes.

The project would not include the addition of lighting, and operation of the project would not require long term energy input beyond that which is currently required. Therefore, the project would result in a less than significant impact on energy resources.

# b. Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

**No Impact.** The California Long-Term Energy Efficiency Strategic Plan provides a roadmap for achieving maximum energy savings across all major sectors in California and identifies strategies for achieving goals for energy. As discussed in response (a) above, fuel consumption from construction vehicles and equipment would be temporary and would represent a negligible increase in regional energy consumption. In addition, project construction and operation would be compliant with CARB Standards. Compliance with CARB emission standards that would reduce energy consumption associated with the use of construction equipment. Once operational, the energy requirements for the project would be similar to existing energy usage. The project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Therefore, the project would result in no impact on local plans for renewable energy or energy efficiency.

# 7. Geology and Soils

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than- Significant Impact	No Impact
Wo	uld the Project:				
	Directly or indirectly cause potential				
a.	substantial adverse effects, including the risk of				
	loss, injury, or death involving:				
	i. Rupture of a known earthquake fault,				
	as delineated on the most recent				
	Alquist-Priolo Earthquake Fault Zoning				
	Map issued by the State Geologist for the area or based on other substantial				$\boxtimes$
	evidence of a known fault? Refer to				
	Division of Mines and Geology Special				
	Publication 42.				
	ii. Strong seismic ground shaking?			$\boxtimes$	
	iii. Seismic-related ground failure,		П	$\boxtimes$	
	including liquefaction?		_	_	
	iv. Landslides?		Ш	$\boxtimes$	
b.	Result in substantial soil erosion or the loss of topsoil?			$\boxtimes$	
	Be located on a geologic unit or soil that is				
	unstable or that would become unstable as a	П		$\bowtie$	П
C.	result of the project and potentially result in an	Ш	Ш		Ш
	on-site or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?				
	Be located on expansive soil, as defined in				
	Table 18-1-B of the Uniform Building Code	П		M	
d.	(1994), creating substantial direct or indirect		Ц	$\boxtimes$	
	risks to life or property?				
	Have soils incapable of adequately supporting				
	the use of septic tanks or alternative				<b>5</b> 7
e.	wastewater disposal systems in areas where		Ш		$\boxtimes$
	sewers are not available for the disposal of waste water?				
	Directly or indirectly destroy a unique				
f	paleontological resource or site or unique		П	$\boxtimes$	
•	geologic feature?		<del></del>	<del>_</del>	<del>_</del>

#### **Environmental Setting**

According to the United States Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) Custom Soil Resource Report for Ventura Area, California the project area is underlain by Castaic-Balcom Complex, 30 to 50 Percent Slopes, Eroded; Cortina Stony Loam, two to nine Percent Slopes; Garretson Gravelly Loam, two to nine Percent Slopes; and Riverwash (United States Department of Agriculture, Natural Resources Conservation Service, 2019a). Based on their texture textures, these soils have a low to moderate potential for erosion (Michigan State University, 2002).

The project area is within the Santa Paula Creek corridor and the elevation in the project area varies from approximately 493 feet above mean sea level (amsl) within the creek bed to approximately 610 feet amsl at the top of the banks. The land around Santa Paula Creek includes hills and orchards. The topography of the creek is generally flat with sloping to nearly vertical banks. According to the CDOC California

Earthquake Hazards Zone Application, the project is within a liquefaction zone (California Department of Conservation, California Earthquake Hazards Zone Application, 2019b).

According to the California Geologic Energy Management Division (CalGEM), two oil wells are located within the immediate vicinity of the project's environmental study limits, along Ojai Road (API 0411106074) and along Bridge Road (API 0411106078). Neither well is expected to be directly impacted by the project, as the wells are located outside the project footprint and the current wells status are shown as "plugged and abandoned" (CalGEM, 2019). CalGEM acknowledges that wells plugged and abandoned to the most current CalGEM requirements, as prescribed by law, have a lower probability of leaking in the future. However, there is no guarantee that such abandonments will not leak.

## **Discussion of Checklist Responses**

- a. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
  - i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

**No Impact.** According to the Department of Conservation's California Geological Survey (CGS), the project area is not located within a known earthquake fault zone (California Department of Conservation, 2019a). Therefore, the project would result in no impact related to a known earthquake fault.

#### ii. Strong Seismic Ground shaking?

Less Than Significant Impact. There are no earthquake faults within the project area, however similar to all of Southern California, active and/or potentially active faults in the region could generate strong ground shaking on the project area. The active Oak Ridge Fault is located approximately 0.8 mile west of the project area. In addition, the San Cayetano fault is approximately 0.2 miles east of the project. In addition, there are regional faults that have the potential to generate strong ground motion; this includes the Northridge Blind Thrust, Santa Susana, San Andreas, and Ventura Faults.

According to the General Plan Hazards and Safety Element, the County shall require that all structures designed for human occupancy incorporate engineering measures to reduce the risk of and mitigate against collapse from ground shaking (Ventura County, 2020). Therefore, the project would result in a less than significant impact related to strong seismic ground shaking

#### iii. Seismically Induced Ground Failure Including liquefaction?

**Less Than Significant Impact.** The project area is on a parcel that is classified as a liquefaction and landslide hazard zone according to the CDOC Earthquake Zones of Required Investigation Hazard maps (California Department of Conservation, California Earthquake Hazards Zone Application, 2019b). The project would be designed to accommodate anticipated levels of ground shaking experienced in the region, as well as risk of landslide and liquefaction. The project would enhance safety of the bridge through design and with the implementation of **GEO-1**. Therefore, the project would result in a less than significant impact related to liquefaction.

#### iv. Landslides, Including Seismically Induced Landslides

Less Than Significant Impact. See discussion in response (a.iii.)

## b. Would the project result in Substantial Soil Erosion or Loss of Topsoil?

Less Than Significant Impact. Erosion is the movement of rocks and soil from the Earth's surface by wind, rain, or running water. Several factors influence erosion, such as the size of soil particles (larger particles are more prone to erosion), and vegetation cover, which prevents erosion. The project area includes an existing bridge and a creek that is surrounded by predominately rocky hillside covered with bushes, grasses, small trees of semi-dense foliage, and other weedy vegetation. Textures in the project area have a low to high erosion potential. Therefore, the project would result in a less than significant impact related to soil erosion.

c. Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

**Less Than Significant Impact.** See discussion in response (a.iii.).

d. Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Less Than Significant Impact. According to the NRCS Web Soil Survey, soils in the project area have a range of linear extensibility of 1.5 percent to 4.5, indicating a low shrink to moderate-swell potential (National Resources Conservation Service, 2021). According to the Ventura County Building Code, in areas likely to have expansive soil, the building official requires soil tests to determine where such soils do exist. If the project is found to reside on expansive soils, the project is required to incorporate a special design consideration in accordance with Section 1808.6 of Ventura County Building Code (Ventura County Building and Safety Division, 2019). Therefore, the project would result in a less than significant impact related to expansive soil.

e. Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems in areas where sewers are not available for the disposal of waste water?

**No Impact.** The project would not require the use of septic tanks or alternative wastewater disposal systems. Therefore, the project would result in no impact on septic tanks or alternative wastewater disposal systems.

f. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant Impact. The General Plan defines unique paleontological features as fossilized remains of plant and animal life; within the county paleontological remains include examples from most of geological history, including the Paleozoic (542 to 251 million years ago), the Mesozoic (251 to 65.5 million years ago), and the Cenozoic (65.5 million years ago to the present). According to the General Plan Resources Appendix, an inventory of paleontological resources has not been completed. However, the project would include rehabilitating an existing bridge where the ground is previously disturbed. In addition, the General Plan Resources Appendix does not identify the project area as having a unique geological resource (Ventura County, 2019). In addition, measure GEO-2 would be implemented to avoid and minimize impacts to paleontological resources. With the implementation of the proposed avoidance and minimization measure GEO-2, the project would result in a less than significant impact on a unique paleontological resource or site or unique geologic feature.

As discussed above, two oil wells are located within the immediate vicinity of the project's environmental study limits, along Ojai Road (API 0411106074) and along Bridge Road (API 0411106078). Neither well is expected to be directly impacted by the project, as the wells are located outside the project footprint and the current wells status are shown as "plugged and abandoned". Measures **GEO-3** through **GEO-6** would be implemented to reduce impacts to less than significant impact in the case these wells or other unknown wells are encountered, or in the case that the integrity of the abandonment of these wells is disturbed.

#### **Avoidance and Minimization Measures**

- **GEO-1** Prior to approval of final plans, a geotechnical study would be completed by an engineering geologist or equivalent to evaluate seismic and non-seismic soil conditions, including but not limited to, expansion potential, subsidence, slope stability and corrosiveness. This report would include evaluation of soil characteristics, identification of potential soil concerns and appropriate measures to address site specific soil conditions. Recommendations of the geotechnical study would be incorporated into the final design plans. The final geotechnical study would be submitted to Ventura County Public Works for review and approval.
- **GEO-2** If previously unidentified paleontological resources are encountered or unearthed during construction, work would be halted in that area until a qualified paleontologist can assess the nature and significance of the find. Additional surveys would be required if the project limits change to include areas not previously surveyed.
- **GEO-3** Access to any well located on the property would be maintained in the event abandonment or reabandonment of the well becomes necessary in the future. Impeding access to a well could result in the need to remove any structure or obstacle that prevents or impedes access. This includes, but is not limited to, buildings, housing, fencing, landscaping, trees, pools, patios, roads, sidewalks, and decking. Maintaining sufficient access is considered the ability for a well servicing unit and associated necessary equipment 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, would be able to pass unimpeded along and over the route, and would be able to access the well without disturbing the integrity of surrounding infrastructure.
- **GEO-4** No well work would be performed on any oil or gas well without written approval from CalGEM in the form of an appropriate permit. This includes, but is not limited to, mitigating leaking fluids or gas from abandoned wells, modifications to well casings including plating, and/or any reabandonment work. If any well needs to be lowered or raised to meet this regulation, a permit from CalGEM is required before work can start.
- **GEO-5** 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, information regarding the identified well(s), and any other pertinent information obtained, would be communicated to the appropriate county recorder for inclusion in the title information of the subject real property.
- **GEO-6** Any soil containing significant amounts of hydrocarbons would be disposed of in accordance with local, state, and federal laws. Appropriate authorities would be notified if soil containing significant amounts of hydrocarbons is discovered during development.

## 8. Greenhouse Gas Emissions

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than- Significant Impact	No Impact
Wo	ould the Project:				
a.	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			$\boxtimes$	
b.	Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?				

### **Environmental Setting**

Greenhouse gas (GHG) emissions refer to a group of emissions that are believed to affect global climate change conditions. The principal GHGs are carbon dioxide  $CO_2$ , methane CH4, nitrous oxide, sulfur hexafluoride, perfluorocarbons, hydrofluorocarbons and water vapor.  $CO_2$  is the reference gas for climate change because it is the predominant GHG emitted. To account for the varying warming potential to different GHGs, GHG emissions are often quantified and reported as  $CO_2$  equivalents ( $CO_2$ e).

In 2006, California passed the California Global Warming Solutions Act of 2006 (Assembly Bill [AB] No. 32; California Health and Safety Code Division 25.5, Sections 38500, et seq., or AB 32), which requires the Air Resources Board (ARB) to design and implement emission limits, regulations, and other measures, such that feasible and cost-effective statewide GHG emissions are reduced to 1990 levels by 2020. As a central requirement of AB 32, the ARB was assigned the task of developing a Scoping Plan that outlines the State's strategy to achieve the 2020 GHG emissions limit. The Scoping Plan, which was developed by the ARB in coordination with the Climate Action Team, was published in October 2008. The Scoping Plan proposed a comprehensive set of actions designed to reduce overall GHG emissions in California, improve the environment, reduce the State's dependence on oil, diversify the State's energy sources, save energy, create new jobs, and enhance public health. An important component of the plan is a cap-and trade program covering 85 percent of the State's emissions. The Scoping Plan was approved by the ARB on December 11, 2008. According to the 2017 Climate Change Scoping Plan Update, California has made progress toward achieving the 2020 statewide target while also reducing criteria pollutants and toxic air contaminants and supporting economic growth (California Air Resources Board, 2017). The ARB published a second update to the Scoping Plan to reflect the 2030 target set by Executive Order B-30-15 and codified by AB 32 (California Air Resources Board, 2017).

According to the 2017 Climate Change Scoping Plan Update, the major source of GHGs in California is transportation, contributing approximately 37 percent of the state's total GHG emissions. Industrial sources are the second largest generator, contributing approximately 24 percent of the state's GHG emissions. Residential and commercial sources contribute only about six and five percent of the state's GHG emissions, respectively. These are less than the eight percent generated by agriculture (California Air Resources Board, 2017).

#### **Discussion of Checklist Responses**

a. Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Less Than Significant Impact. Ventura County is adjacent to the South Coast Air Quality Management District (SCAQMD) jurisdiction and is a part of the Southern California Association of Governments (SCAG) region, VCAPCD staff currently believes that it makes sense to set local GHG emission thresholds of significance for land use development projects at levels consistent with those set by the SCAQMD and the SCAG region. VCAPCD staff currently believe that adopting harmonized regional GHG emission thresholds would help streamline project review and encourage consistency and uniformity in the CEQA analysis of GHG emissions throughout most of Southern California. The SCAQMD has been evaluating GHG significance thresholds since April 2008. In December 2008, the SCAQMD adopted an interim 10,000 metric tons CO<sub>2</sub>e (MTCO<sub>2</sub>e) per year screening level threshold for stationary source/industrial projects for which the SCAQMD is the lead agency. The SCAQMD has continued to consider adoption of significance thresholds for residential and general development projects. The most recent proposal issued in September 2010 uses the following tiered approach to evaluate potential GHG impacts from various uses:

Tier 1 Determine if CEQA categorical exemptions are applicable. If not, move to Tier 2.

Tier 2 Consider whether or not the proposed project is consistent with a locally adopted GHG reduction plan that has gone through public hearings and CEQA review, which has an approved inventory, includes monitoring, etc. If not, move to Tier 3.

Tier 3 Consider whether the project generates GHG emissions in excess of screening thresholds for individual land uses. The  $10,000 \, \text{MTCO}_2\text{e}/\text{year}$  threshold for industrial uses would be recommended for use by all lead agencies. Under option 1, separate screening thresholds are proposed for residential projects (3,500 MTCO<sub>2</sub>e/year), commercial projects (1,400 MTCO<sub>2</sub>e/year), and mixed-use projects (3,000 MTCO<sub>2</sub>e/year). Under option 2 a single numerical screening threshold of 3,000 MTCO<sub>2</sub>e/year would be used for all non-industrial projects. If the project generates emissions in excess of the applicable screening threshold, move to Tier 4.

Tier 4 Consider whether the project generates GHG emissions in excess of applicable performance standards for the project service population (population plus employment). The efficiency targets were established based on the goal of AB 32 to reduce statewide GHG emissions by 2020 and 2035. The 2020 efficiency targets are  $4.8 \, \text{MTCO}_2\text{e}$  per service population for project level analyses and  $6.6 \, \text{MTCO}_2\text{e}$  per service population for plan level analyses. The 2035 targets that reduce emissions to 40 percent below 1990 levels are  $3.0 \, \text{MTCO}_2\text{e}$  per service population for plan level analyses. If the project generates emissions in excess of the applicable efficiency targets, move to Tier 5.

Tier 5 Consider the implementation of CEQA mitigation (including the purchase of GHG offsets) to reduce the project efficiency target to Tier 4 levels.

The thresholds identified above have not been adopted by the SCAQMD or distributed for widespread public review and comment, and the working group tasked with developing the thresholds has not met since September 2010. The future schedule and likelihood of threshold adoption is uncertain

Construction GHG emissions will result from on-site construction equipment and off-site vehicle traffic,

including worker commute trips and material haul trips. These emissions will be produced at different levels throughout the construction phase; their frequency and occurrence can be reduced through innovations in plans and specifications and by implementing better traffic management during construction phases.

In addition, with innovations such as longer pavement lives, improved traffic management plans, and changes in materials, the GHG emissions produced during construction can be offset to some degree by longer intervals between maintenance and rehabilitation activities.

CalEEMod was used to estimate GHG emissions associated with construction activities. Estimated GHG emissions include on-road vehicle trips and off-road equipment use. **Table 12** provides a summary of construction-generated GHG emissions. As depicted, construction of the project would be expected to generate a total of approximately 72.7 metric tons of MTCO<sub>2</sub>e. GHG emissions would cease following construction.

**Table 12 Estimated Construction GHG Emissions** 

Construction Phase	Emissions (MTCO₂e)
Clearing & Grubbing	2.0
Construct Temporary Weather Crossing	5.6
Grading Temporary Access Ramp	16.0
Structure Excavation	7.8
Drilling & Secant Pile Wall Construction	34.0
Backfill & Channel Restoration	5.6
Bridge Work	1.7
Total:	72.7

Source: (Ambient Air Quality and Noise Consulting, 2021)

Notes: Emissions were estimated using the CalEEMod computer program, version 2020.4.0.

The project would produce 72.7 MTCO₂e, which is less than the thresholds described above. In addition, with the implementation of the measure **GHG-1** and **AQ-1** through **AQ-9**, short-term GHG emissions associated with construction activities would be minimized. Therefore, the project would result in a less than significant impact on GHG emissions.

# b. Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

**Less Than Significant Impact.** As discussed in response (a) above, construction of the project would contribute to minimal increases in GHG emissions, and operation of the project is not expected to increase GHG emissions. Therefore, the project would result in a less than significant impact on GHG related applicable plans, policies, and regulations.

#### **Avoidance and Minimization Measures**

**GHG-1** A traffic management plan would be developed and implemented in accordance with the 2018 Caltrans Standard Specifications and must comply with the California Manual on Uniform Traffic Control Devices, Part 6, "Temporary Traffic Control."

## 9. Hazards and Hazardous Materials

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than- Significant Impact	No Impact
Wo	uld the Project:				
a.	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? Create a significant hazard to the public or the			$\boxtimes$	
b.	environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?				
c.	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				
d.	Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				
e.	For a Project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project result in a safety hazard or excessive noise for people residing or working in the Project Area?				×
f.	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?			$\boxtimes$	
g.	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?				

## **Environmental Setting**

A Site Investigation was prepared for the project on June 20, 2020. A database search was requested from Environmental Data Resources (EDR) to provide a database search of public lists of sites that generate, store, treat, or dispose of hazardous materials or sites for which a release or incident has occurred. An EDR search was conducted for the project area and included data from surrounding sites within specified radii of the project area. The purpose of this EDR database search was to assess whether there are Recognized Environmental Conditions (REC) associated with the project area. The project area was not listed in any of the databases searched by EDR. Four nearby properties were listed in databases searched by EDR; however, hazards on the properties are not expected to impact the project. No known or suspected RECs associated with the project area have been identified by the environmental database search and review (Rincon Consultants Inc., 2020).

To evaluate potential Aerially Deposited Lead (ADL) and agricultural-related impacts on shallow soil within the limits of the project area, soil matrix samples and water samples were collected. Twenty soil matrix samples were collected at zero to 0.5 feet and 1.5 to 2.0 feet below existing grade from each of the eight soil boring locations within the project area. Two grab water samples were collected (plus one duplicate) from Santa Paula Creek within the project area.

Soil Matrix Laboratory analytical results were compared to the following screening levels:

- Background Concentrations of Trace and Major Elements in California Soils (Kearney Foundation, 1996)
- San Francisco Bay Regional Water Quality Control Board (SFBRWQCB) Environmental Screening Levels (ESL) construction worker soil exposure scenario, to be protective of human health (SFB RWQCB 2019)
- Total Threshold Limit Concentration and Soluble Threshold Limit Concentration (STLC)

Detectable concentrations of lead were reported for each soil matrix sample analyzed. The detected concentrations of lead in all samples but two were below the construction worker ESL of 160 mg/kg. The detected concentrations of lead in two soil samples exceeded the 50 mg/kg triggering analysis for soluble lead. Therefore, the two samples containing concentrations of lead above 50 mg/kg were analyzed for STLC and Toxicity Characteristic Leaching Procedure (TCLP) lead (Rincon Consultants Inc., 2020).

The detected concentrations of STLC lead ranged from 3.1 milligrams per liter (mg/L) to 3.5 mg/L, which is below the STLC threshold of five mg/L. TCLP lead was detected at concentrations less than 1.0 mg/L. Therefore, the detected lead concentrations in soil would classify as non-hazardous waste if excavated. Therefore, no further assessment or hazardous waste analysis for ADL in soil is required.

Detectable concentrations of arsenic were reported for each soil matrix sample analyzed. The concentrations of arsenic ranged from 2.8 mg/kg to 8.6 mg/kg. Although the detected concentrations of arsenic were above the construction worker ESL of 0.98 mg/kg, all of the concentrations detected were within the accepted California background concentration range for arsenic in soil, as published by the Kearney Foundation (0.6 mg/kg to 11 mg/kg). It is typical for concentrations of arsenic to be above screening levels such as the ESLs. The detected arsenic concentrations in soil would classify as non-hazardous materials if excavated. Therefore, no further assessment or hazardous waste analysis for arsenic in soil is required.

All of the other detected concentrations of metals were below the established ESLs and hazardous waste thresholds.

The following Organochlorine Pesticides (OCP) were detected at concentrations above the laboratory detection limits: 4,4-DDD, 4,4-DDE, and 4,4-DDT. No other pesticides were detected above the laboratory detection limits. The detected concentrations of pesticides in soil would classify as non-hazardous waste, if excavated. Therefore, no further assessment or hazardous waste analysis for OCPs in soil is required.

- 4,4-DDD: Concentrations ranged from non-detect (below laboratory detection limits) to 0.0013 mg/kg. None of the concentrations detected exceeded the SFB RWQCB ESL for construction worker safety.
- 4,4-DDE: Concentrations ranged from non-detect to 0.0032 mg/kg . None of the concentrations detected exceeded the SFB RWQCB ESL for construction worker safety.
- 4,4-DDT: Concentrations ranged from non-detect to 0.019 mg/kg. None of the concentrations detected exceeded the SFB RWQCB ESL for construction worker safety.

Two grab water samples were collected from Santa Paula Creek within the project area. One water sample was collected near the bridge at the northern section of the project area and another sample was collected near the dry creek crossing in the southern section of the project area. Water laboratory analytical results were compared to the following screening levels:

- Background Concentrations of Trace and Major Elements in California Soils (Kearney Foundation, 1996)
- Maximum Contaminant Levels Priority, SFB RWQCB (SFB RWQCB 2019) Total Lead and Arsenic

No lead, arsenic or OCPs were detected above laboratory reporting limits in the two grab water samples and one duplicate water sample collected. Therefore, no further assessment or hazardous waste analysis pertaining to water at the project area is required (Rincon Consultants Inc., 2020).

The shallow soil and water beneath the project area would be handled as non-hazardous waste and no further assessment or hazardous waste analysis is required.

## **Discussion of Checklist Responses**

a. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact. A hazardous material is any substance that may be explosive, flammable, poisonous, corrosive, radioactive, reactive, or any combination thereof, because of its quality, concentration, or characteristics. Hazardous materials may require special care in handling due to the hazards they pose to public health, safety, and the environment. Construction and operation of the project would not involve the use or transport of hazardous materials beyond those used typically used for construction equipment or typical cleaning and landscaping materials. Materials used for construction would be transported to and within the project area for construction activities. Hazardous materials used for typical construction may include diesel fuel, lubricants, adhesives, cleaning solutions, and chemical toilets. Hazardous materials use and transport during both construction of the project would be compliant with applicable federal, state, and County regulations regarding their storage, on-site use, and off-site disposal. Therefore, the project would result in a less than significant impact related to the routine transport, use, or disposal of hazardous materials.

b. Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

**Less Than Significant Impact.** The soil in the project area was analyzed for ADL and arsenic. The detected concentrations of lead in all samples but two were below the construction worker ESL of 160 mg/kg. The other two samples had detected concentrations of STLC lead ranged from 3.1 mg/L to 3.5 mg/L, which is below the STLC threshold of five mg/L. Therefore, the detected lead concentrations in soil would classify as non-hazardous waste if excavated.

The concentrations of arsenic ranged from were within the accepted California background concentration range for arsenic in soil, as published by the Kearney Foundation. The detected arsenic concentrations in soil would classify as non-hazardous waste if excavated.

Neither lead, arsenic nor OCPs were detected above laboratory reporting limits in the two grab water samples from Santa Paula Creek. Therefore, no further assessment or hazardous waste analysis pertaining to water at the project area is required. Therefore, the project would result in a less than significant impact on the release of hazardous materials.

c. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

**Less Than Significant Impact.** There nearest school to the project area is Mupu School, approximately 0.2 mile away. However, as discussed in response (b), the shallow soil and water beneath the project can be handled as nonhazardous waste. The likelihood of a hazardous material being released is low. In addition, transport of materials would not pass the school, and emissions of the vehicles would be avoided and minimized with measures **AQ-1** through **AQ-9** and **GHG-1**. Therefore, the project would result in a less than significant impact on hazardous emissions

d. Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

**No Impact**. According to the Department of Toxic Substance Control database, EnviroStor, the project area does not contain any active or inactive hazardous waste or cleanup sites (Department of Toxic Substance Control, 2021). Additionally, according to the State Water Resources Control Board's GeoTracker, there are no hazardous waste clean-up sites within a 0.5-radius of the project area (State Water Resources Control Board, 2021). Therefore, the project would result in no impact related to hazardous materials listed in Government Code Section 65962.5.

e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the Project Area?

**No Impact.** The closest airport to the project area is the Oxnard Airport, approximately six miles away. There are no airports within two miles of the project area; therefore, the project would result in no impact on an airport land use planning area.

f. Would the project Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

**Less Than Significant Impact.** Ventura County Emergency Operation Plan includes steps for response in the case of an emergency (County of Ventura, Emergency Operations Plan, 2013). The steps are the following.

- Evacuation of threatened populations to safe areas
- Advising threatened populations of the emergency and apprising them of safety measures to be implemented
- Advising adjacent jurisdictions (Los Angeles and Santa Barbara Operational Areas) of the emergency
- Identifying the need for mutual aid and requesting such through the appropriate, established chain and the California Emergency Management Agency Southern Region
- Proclamation of a Local Emergency by the Sheriff (As Director of Emergency Services), ratified by the County Board of Supervisors (See Management Support Documentation)

Construction would take approximately four months, it is anticipated that Bridge Road would be partially closed during working hours; however, the roadway would remain open to through-traffic during non-working hours to maintain continuous access for local residents and would allow continuous access. Therefore, the project would result in a less than significant impact on an adopted emergency response plan or emergency evacuation plan.

# g. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

Less Than Significant Impact. According to the General Plan Safety Element the majority of the project area is in a Moderate Fire Hazard Zone of state responsibility; the northwest and southwest corners of the project area are in high fire hazard zone (County of Ventura Resource Management Agency Planning Division, 2019). In addition, directly adjacent to the project area, there are areas zoned State Responsibility Very High Fire Hazard. The presence of construction equipment and fuel sources could temporarily exacerbate fire risk in the project area. WDF-1 through WDF-4 would be implemented to avoid and minimize impacts related to wildfire. With the implementation of WDF-1 through WDF-4 (see Section 20 Wildfire), the project would result in a less than significant impact on wildland fires.

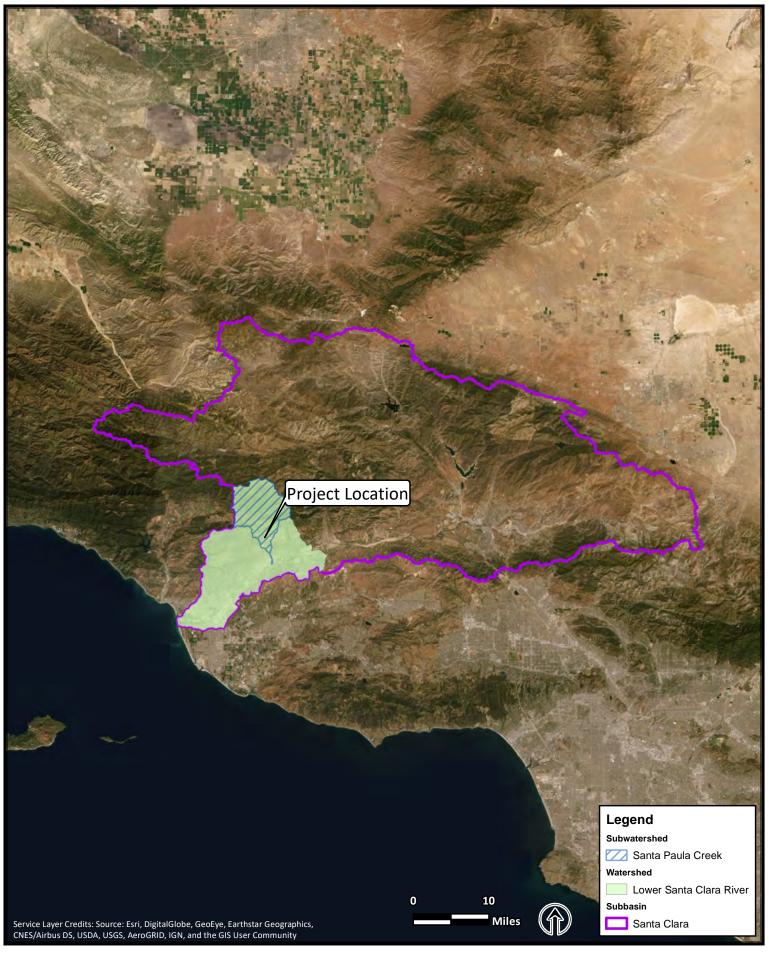
# 10. Hydrology and Water Quality

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than- Significant Impact	No Impact
Wo	uld the Project:				
a.	Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality? Substantially decrease groundwater supplies or interfere substantially with				
b.	groundwater recharge, such that the project may impede sustainable groundwater management of the basin?			⊠	
C.	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would:  i. Result in substantial				
	erosion or siltation on- or off-site;				
	<li>ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;</li>				
	iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or				
	iv. Impede or redirect flood flows?			$\boxtimes$	
d.	In flood hazard, tsunami, or seiche zones, rise release of pollutants due to project inundation?  Conflict with or obstruct				
е.	implementation of a water quality control plan or sustainable groundwater management plan?				

## **Environmental Setting**

## **Regional Hydrology**

The project area is in the Santa Paula Creek subwatershed (HUC 180701020901) of the Lower Santa Clara River watershed (HUC 1807010209) (United States Department of Agriculture, Natural Resources Conservation Service, 2019a) (see **Figure 8**).





Santa Paula Creek drains approximately 44.4 square miles and is a major tributary to the Santa Clara River (Michael Baker International, 2019b). The headwaters of Santa Paula Creek begin at the south-facing slopes of the Topatopa mountains, and the downstream limit of the watershed is at the confluence with the Santa Clara River.

## **Local Hydrology**

## **Surface Waters**

#### Santa Paula Creek

The headwaters of Santa Paula Creek are along the south-facing slopes of the Topatopa Mountains, approximately 6,500 feet amsl (United States Geological Survey, 2018). Santa Paula Creek is a perennial creek, flows in a southeasterly direction, and is a major tributary to the lower Santa Clara River. Annual flows in Santa Paula Creek vary substantially, with multi-year droughts and seasonal flooding (RBF Consulting and Stillwater Sciences, 2009). Within the project area, Santa Paula Creek consists of a low-flow channel within the active floodplain and low terraces.

#### Side Channel A

Side Channel A is an earthen channel located west of Santa Paula Creek and upstream of Bridge Road Bridge. This channel appears to originate further upstream (outside of the project area) from a seep on the western bank of Santa Paula Creek. Within the project area, the channel flows in a southern direction.

## Side Channel B

Side Channel B is an earthen channel located east of Santa Paula Creek and downstream of Bridge Road Bridge. This channel appears to originate from Magnolia Drive Creek east of Bridge Road and north of Fair-Weather Crossing, outside of the project area. Within the project area, the channel flows in a southwesterly direction and into Santa Paula Creek.

The designated inland surface water beneficial uses for Santa Paula Creek and the associated side channels (Santa Clara River to Santa Paula Water Works Diversion Dam as listed in the Water Quality Control Plan) are Municipal and Domestic Supply; Industrial Service Supply; Industrial Process Supply; Agricultural Supply; Ground Water Recharge; Freshwater Replenishment; Warm Freshwater Habitat; Cold Freshwater Habitat (COLD); Wildlife Habitat; Rare, Threatened, or Endangered Species; Migration of Aquatic Organisms; and Spawning, Reproduction, and/or Early Development (California Regional Water Quality Control Board, Los Angeles Region, 1994).

## Floodplain

According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) panel 06111C0614E, the project is located within two defined flood zones, Shaded Zone X and Zone AE (Michael Baker International, 2019b). Shaded Zone X areas are characterized as the following: areas that have a 0.2 percent annual chance of flood, areas of one percent annual chance of flood with average depths of less than one foot or with drainage areas less than one square mile, and areas protected by levees from one percent annual chance of flood. Zone AE areas are characterized as areas that have a one percent probability of flooding in any given year, and where predicted flood water elevations have been established (Michael Baker International, 2019b).

#### Groundwater

The project is located within the Santa Clara River Valley Groundwater Basin within the Fillmore Subbasin (California Regional Water Quality Control Board, Los Angeles Region, 1994). The Fillmore Subbasin is bounded by impervious rocks of the Topatopa Mountains and the San Cayetano fault to the north, the impervious rocks of Oak Ridge and Oak Ridge fault to the south, and bedrock constrictions to the east and west (California Department of Water Resources, 2006). The Fillmore Subbasin is recharged by percolation of surface flow from the Santa Clara River, Sespe Creek, and minor tributary streams. According to the Location Hydraulic Study Report, the groundwater depth in the City of Santa Paula varies depending on the specific location within the Fillmore Subbasin. Historically, water levels within the Fillmore Subbasin have fluctuated between 25 and 50 feet (Michael Baker International, 2019b).

#### Ventura County General Plan

As outlined in the Water Resources Element of the General Plan, the following goals and policies would apply to the project (County of Ventura Resource Management Agency Planning Division, 2019):

#### Goals:

- Inventory and monitor the quantity and quality of Ventura County's water resources.
- Effectively manage the water resources of Ventura County by adequately planning for the development, conservation, and protection of water resources for present and future generations.
- Maintain and where feasible, restore the chemical, physical, and biological integrity of surface and groundwater resources.
- Protect and, where feasible, enhance watersheds and aquifer recharge areas.

#### **Policies:**

- Discretionary development shall comply with all applicable County and State water regulations.
- Discretionary development shall not significantly impact the quantity or quality of water resources within watersheds, groundwater recharge areas or groundwater basins.

#### Los Angeles Regional Water Quality Control Board Basin Plan

Section 13240 of the Porter-Cologne Water Quality Control Act requires each RWQCB to formulate and adopt water quality control plans, or basin plans, for all areas within the region. Water quality in the project area is regulated by the Los Angeles RWQCB through the Water Quality Control Plan (Basin Plan) (California Regional Water Quality Control Board, Los Angeles Region, 1994).

The Basin Plan lists the beneficial uses of surface waters and groundwaters in the region. Beneficial uses are uses that may be protected against quality degradation. These uses include and are not limited to domestic, municipal, agricultural, and industrial supply; power generation; recreation; aesthetic enjoyment; navigation; and preservation and enhancement of fish, wildlife, and other aquatic resources or preserves. The beneficial uses of surface waters and groundwaters in the basin are designated in the water quality control plans.

The Basin Plan also includes water quality objectives, which are the limits or levels of water quality constituents or characteristics. These objectives are for the reasonable protection of beneficial uses of

water or the prevention of nuisance, such as injurious to health, offensive to the senses, or interfere with the enjoyment of life or property, within a specific area.

## **Ventura County Watershed Protection District**

The Ventura County Watershed Protection District (VCWPD) provides for the control and conservation of flood and stormwaters, and for the protection and maintenance of watercourses, watersheds, and life and property within VCWPD jurisdiction from damage or destruction from storm flows or flooding (Ventura County Public Works, 2019). An encroachment permit is required from the VCWPD for any grading work that would be conducted within a channel under VCWPD jurisdiction.

## **Discussion of Checklist Responses**

a. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

Less Than Significant Impact. During construction, there is the potential for increased turbidity in Santa Paula Creek within the project area as a result of disturbed soils, and there is potential for minor fuel and oil spills from construction equipment. These potential impacts would be temporary and would not result in a permanent change in water quality within Santa Paula Creek. With implementation of BMPs, WQ-1 to WQ-5, and the compliance with the Basin Plan, substantial soil erosion or the release of pollutants within Santa Paula Creek is not anticipated. Therefore, the project would result in less than significant impacts related to groundwater and surface water quality.

b. Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge, such that the project may impede sustainable groundwater management of the basin?

**Less Than Significant Impact.** The project is within the Santa Clara River Valley Groundwater Basin within the Fillmore Subbasin (California Regional Water Quality Control Board, Los Angeles Region, 1994) Operation of the project would not require the use of any water and project construction would require a minimal amount of water. Implementation of the project would not result in an increase in impervious surfaces or an increase in stormwater runoff into the creek. Therefore, the project would result in less than significant impacts on groundwater recharge.

- c. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would:
- i. Result in substantial erosion or siltation on- or off-site; Less Than Significant Impact. See discussion in response (a) above.
  - ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;

Less Than Significant Impact. A range of pollutants, such as trash left at construction sites and petroleum hydrocarbons spilled from the equipment at construction sites have the potential to affect the chemical characteristics of the aquatic environment. Runoff associated with construction activities has the potential to degrade water quality. However, impacts on the physical/chemical characteristics of the aquatic environment would be short-term and temporary. With implementation of **WQ-1** through **WQ-8**, impacts from sediments and potential pollutants would be minimized. In addition, implementation of the project would not result in an increase in impervious surfaces or an increase in stormwater runoff into the

creek. Therefore, the project would result in less than significant impacts related to surface runoff.

iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

**Less Than Significant Impact.** See discussion in response (c.ii) above.

#### iv. Impede or redirect flood flows?

Less Than Significant Impact. During construction, a temporary water diversion would be installed to construct the pile wall. In addition, a temporary low-water crossing would be installed within Santa Paula Creek at Fair Weather Crossing for construction equipment to access the project area and a temporary access ramp would be constructed into the creek at the northwest side of the bridge. A culvert would be placed within the temporary crossing to allow creek flows to pass. Implementation of the project would not result in any flow diversion. Upon completion of construction, both the diversion and low-water crossing would be removed, and the area would be recontoured to pre-construction conditions. Therefore, the project would result in less than significant impacts related to flood flows.

d. In flood hazard, tsunami, or seiche zones, rise release of pollutants due to project inundation?

Less Than Significant Impact. According to the FEMA FIRM panel 06111C0614E, the project is located within two defined flood zones, Shaded Zone X and Zone AE (Michael Baker International, 2019b). Shaded Zone X areas are characterized as the following: areas that have a 0.2 percent annual chance of flood, areas of one percent annual chance of flood with average depths of less than one foot or with drainage areas less than one square mile, and areas protected by levees from one percent annual chance of flood. Zone AE areas are characterized as areas that have a one percent probability of flooding in any given year, and where predicted flood water elevations have been established (Michael Baker International, 2019b).

A tsunami is a series of traveling ocean waves of extremely long length generated primarily by vertical movement on a fault (earthquake) occurring along the ocean floor. The project area is located approximately 19 miles from the coastline and, therefore, is not subject to inundation by tsunami. The project area is also not located near a large inland body of water which could generate a seiche during seismic ground shaking. The existing hydrology would not be substantially altered, and runoff would not be substantially increased with the implementation of measures **WQ-1** through **WQ-8**.

The project is not in a tsunami, or seiche zones, and while the project is in a flood hazard zone, with implementation of measures **WQ-1** through **WQ-8** there would not be a risk of pollutants being released due to inundation. Therefore, the project would result in a less than significant impact related to flood hazard, tsunami, or seiche zones.

# e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

**No Impact.** During project construction, there is potential that exposed soils, construction debris, and other pollutants could enter the creek. In addition, there is potential for construction-related pollutants to be spilled or leaked into the water. However, standard BMPs, including erosion control measures, and measures **WQ-1** through **WQ-8** would be incorporated into the project to comply with the County's National Pollutant Discharge Elimination System Permit. Therefore, the project would result in no impact related to water quality control or sustainable groundwater management plans.

#### **Avoidance and Minimization Measures**

The project would comply with Caltrans Standard Specifications for Water Pollution Control and Erosion Control and measures would be incorporated into the project to comply with the Clean Water Act (CWA) Section 404 Permit, a CWA Section 401 Water Quality Certification, and a California Fish and Game Code Section 1602 Streambed Alteration Agreement. In addition to standard BMPs, the following avoidance and minimization measures would be implemented during construction to avoid or minimize adverse effects on water quality within Santa Paula Creek during construction:

- **WQ-1** Work areas would be reduced to the maximum extent feasible.
- **WQ-2** Equipment staging areas and storage areas for vehicles, equipment, materials, fuels, lubricants, solvents, etc. would be restricted to designated areas and would not be located within Santa Paula Creek.
- WQ-3 Erosion Control BMPs (e.g., silt fencing and fiber rolls) would be implemented to minimize dust, dirt, and debris resulting from construction activities entering Santa Paula Creek and to protect the water quality of Santa Paula Creek pursuant to the requirements of the regulatory permits (i.e., CWA Section 404/401 and California Fish and Game Code Section 1602) issued for this project.
- **WQ-4** Appropriate hazardous material BMPs (e.g., on-site spill prevention kit) would be implemented to minimize the potential for chemical spills, containment releases, and non-storm water discharge into Santa Paula Creek.
- WQ-5 All equipment refueling, and maintenance would be conducted in the staging area away from Santa Paula Creek in accordance with Caltrans' standard specifications and requirements of the regulatory permits issued for this project. In addition, vehicles and equipment would be checked daily for fluid and fuel leaks and drip pans would be placed under all equipment that is parked and not in operation. Any leaking vehicle or equipment would not be operated in the project area until repaired. All workers would be informed of the importance of preventing spills and the appropriate measures to take should a spill occur.
- WQ-6 Following completion of construction activities, appropriate erosion control measures would be implemented to ensure that soils disturbed by construction are stabilized to minimize non-storm water discharges into Santa Paula Creek and to meet the requirements of the regulatory permits issued for this project (i.e., CWA Section 404/401 and California Fish and Game Code Section 1602).
- WQ-7 All disturbance to aquatic habitat, including jurisdictional waters, would be minimized with the use of environmentally sensitive area fencing and all soil exposed as a result of project construction would be revegetated using native-plant hydroseeding or live planting methods. Restoration would be at a minimum ratio of 1:1, or as agreed upon as part of regulatory permitting.
- **WQ-8** Any temporary erosion control implemented during construction would be completed using non-invasive species.

## 11. Land Use and Planning

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Wo	uld the Project:				
a.	Physically divide an established community?				
b.	Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?				⊠

## **Environmental Setting**

## Ventura County General Plan

The General Plan sets forth goals, policies, and programs that the County will implement to manage future growth and land uses within Ventura County. The following Land Use goals and policies would apply to the project (County of Ventura Resource Management Agency Planning Division, 2019).

#### Goals:

- To identify, preserve, protect, and restore sensitive biological resources, including federal and statedesignated endangered, threatened, rare, or candidate species and their supporting habitats; wetland and riparian habitats; coastal habitats; habitat connectivity and wildlife corridors; and habitats and species identified as "locally important" by the County.
- To preserve, protect, and enhance the unique scenic resources in Ventura County, and ensure access to scenic resources within Ventura County for present and future generations.

## **Policies:**

- The County shall ensure that discretionary development that could potentially impact sensitive biological resources be evaluated by a qualified biologist to assess impacts and, if necessary, develop mitigation measures that fully account for the impacted resource. When feasible, mitigation measures should adhere to the following priority: avoid impacts, minimize impacts, and compensate for impacts. If the impacts cannot be reduced to a less than significant level, findings of overriding considerations must be made by the decision-making body. (MPSP, IGC, RDR)
- The County shall identify sensitive biological resources as part of any land use designation change to the General Plan Land Use Diagram or zone designation change to the Zoning Ordinance that would intensify the uses in a given area. The County shall prioritize conservation of areas with sensitive biological resources. (MPSP)
- The County shall require discretionary development that includes new or modified road crossings over streams, wetlands and riparian habitats to include bridging design features with bridge columns located outside the riparian habitat areas, when feasible. (RDR)
- The County shall protect the visual character of scenic resources visible from state or County designated scenic roadways. (RDR)
- The County shall require discretionary development outside of Existing Communities be planned and designed to maintain the scenic open space character of the surrounding area, including view corridors from highways. Discretionary development should integrate design, construction, and maintenance techniques that minimize the visibility of structures from public viewing locations within scenic vistas. (RDR)

## **Discussion of Checklist Responses**

## a. Would the project divide an Established Community?

**No Impact.** During the four month construction period, it is anticipated that Bridge Road would be partially closed during working hours; however, the roadway would remain open to through-traffic during non-working hours to maintain continuous access for local residents. The project would not result in the construction of any new barriers that could potentially divide an established community. The bridge would provide continuous access throughout construction and have the full access during operation. Therefore, the project would result in no impact related to physically dividing an established community.

## b. Would the project conflict with Land Use Plans or Policies?

**No Impact.** The purpose of the project is to improve public safety and ensure long-term access through the project area by providing a permanent, safe crossing over Santa Paula Creek. The purpose of the project is consistent with goals and policies specified as related to the project above. The project would not require re-designation of land use or rezoning and would be consistent with the existing land use designations included in the General Plan. Therefore, the project would result in no impact related to applicable land use plans or policies.

## 12. Mineral Resources

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than- Significant Impact	No Impact
Wo	ould the Project:				_
a.	Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				
b.	Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?				⊠

## **Environmental Setting**

#### **State Regulations**

The Surface Mining and Reclamation Act of 1975 (SMARA, Public Resources Code, Sections 2710-2796) encourages the production, conservation, and protection of California's mineral resources. SMARA requires that the State Mining and Geology Board map areas throughout the State of California that contain regionally significant mineral resources. These mineral resources are classified based on the Mineral Resource Zone (MRZ) system, which classifies MRZs into four categories:

- MRZ-1: Areas where adequate information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence.
- MRZ-2: Areas where adequate information indicates that significant mineral deposits are present, or where it is judged that a high likelihood exists for their presence.
- MRZ-3: Areas containing mineral deposits for which the significance cannot be determined from available data.
- MRZ-4: Areas where available information is inadequate for assignment of any other MRZ category.

According to the Background Report for the General Plan, the project area has been identified as a MRZ-3A (County of Ventura, 2020). MRZ-3A is defined as an area as containing known mineral deposits that may qualify as mineral resources. The County has determined that the only land protected from incompatible land uses that would inhibit extraction of or access to the available mineral resources are those classified MRZ-2 (or otherwise designated as areas of statewide or regional significance for mineral resources).

#### **Discussion of Checklist Responses**

a. Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

**No Impact.** According to the Background Report for the General Plan, the project area has been zoned as MRZ-3A (County of Ventura, 2020). As discussed above, the County has determined that the only land protected from incompatible land uses that would inhibit extraction of or access to the available mineral resources are those classified MRZ-2 (or otherwise designated as areas of statewide or regional significance for mineral resources). Therefore, the project would result in no impact on mineral resources.

b. Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?
 No Impact. See discussion in response (a) above.

## 13. Noise

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than- Significant Impact	No Impact
Wo	ould the Project result in:				_
	Generation of a substantial temporary or				
a.	permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in a local general plan or noise ordinance or applicable				
b.	standards of other agencies?  Generation of excessive groundborne vibration or groundborne noise levels?  For a project located within the vicinity of a				
c.	private airstrip or an airport land use plan, or, where such a plan has not been adopted, within two miles of a public airport or public-use airport, would the Project expose people residing or working in the Project Area to excessive noise levels?				

## **Environmental Setting**

The project area is in a rural portion of Ventura County, approximately 40 feet away from the nearest sensitive noise receptor. The primary source of noise in the project area is from traffic along SR-150.

#### **Local Regulations**

The County Board of Supervisors adopted a Noise Ordinance intended to protect residential communities from loud or raucous nighttime noise. No person shall create within any residential zone of the County of Ventura any loud or raucous noise which is audible to the human ear during the hours of 9 p.m. to 7 a.m. of the following day, at a distance of 50 feet from the property line of the noise source or 50 feet from any such noise source if the noise source is in a public right-of-way (County of Ventura, 1996).

## Ventura County Construction Noise Thresholds Criteria and Control Plan

Daytime Construction: Daytime (7:00 a.m. to 7:00 p.m. Monday through Friday, and from 9:00 a.m. to 7:00 p.m. Saturday, Sunday, and local holidays) generally means any time period not specifically defined as a more noise-sensitive time period (see **Table 13**). Depending on project duration, the daytime noise threshold criteria is the greater of the fixed Leq(h) limit (which includes non-construction evening and nighttime noise) or the measured ambient Leq(h) plus three decibels (dB).

**Table 13 Daytime Noise Thresholds** 

Construction Duration Affecting	Noise Threshold Criteria shall be at the nearest receptor area or 1 sensitive building	the greater of these noise levels Ofeet from the nearest noise-
Noise-sensitive Receptors	Fixed Leq(h), dBA	Hourly Equivalent Noise Level (Leq), dBA <sup>1,2</sup>
0 to 3 days	75	Ambient Leq(h) + 3 dB
4 to 7 days	70	Ambient Leq(h) + 3 dB
1 to 2 weeks	65	Ambient Leq(h) + 3 dB
2 to 8 weeks	60	Ambient Leq(h) + 3 dB
Longer than 8 weeks	55	Ambient Leq(h) + 3 dB

Source: (County of Ventura, 2010)

Notes: 1. The instantaneous Lmax shall not exceed the NTC by 20 dBA more than eight times per daytime hour. 2. Local ambient Leq measurements shall be made on any mid-week day prior to project work

## **Discussion of Checklist Responses**

a. Would the project generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in a local general plan or noise ordinance or applicable standards of other agencies?

Less Than Significant Impact. Land uses generally surrounding the project area include Low and Very Low Density Residential. Open Space and Agriculture (see Figure 4). Surrounding residents would be considered sensitive receptors since they would be heavily exposed to any potential noise impacts generated by the project. The nearest residential property is located approximately 40 feet to the northwest of the project area. Existing noise sources in the project area include passing vehicles and sounds from residential and agricultural uses. However, with the implementation of avoidance and minimization measures BIO-19 and BIO-20 listed under Section 4, Biological Resources the project would result in a less than significant impacts on sensitive receptors.

Noise can be a nuisance when the noise level does not support surrounding land uses noise thresholds. The County Board of Supervisors adopted a Noise Ordinance intended to protect residential communities from loud or raucous nighttime noise. In addition, all construction within Ventura County must follow the Construction Noise Thresholds Criteria and Control Plan. Noise-generating activities could be disruptive, and even harmful, if surrounding land uses support populations of sensitive receptors. Sensitive receptors generally describe persons that may be more heavily exposed to impacts, or more sensitive to impacts, than the general population of a given community or area.

The County Construction Noise Thresholds Criteria and Control Plan restrict daytime noise to 7:00 a.m. to 7:00 p.m. Monday through Friday, and from 9:00 a.m. to 7:00 p.m. Saturday, Sunday and local holidays. Project construction would require use of machinery and vehicles that could result in temporary increases in noise levels. Noise impacts would be minimized to the times specified under the County Construction Noise Thresholds Criteria and Control Plan. By minimizing construction days and times, potential noise impacts would be minimized. Following project completion, noise levels would resume to existing conditions. However, with the implementation of avoidance and minimization measures **NOI-1** and **NOI-6** the project would result in a less than significant impacts on noise levels.

b. Generation of excessive groundborne vibration or ground borne noise levels?

**Less Than Significant Impact.** Vibration is sound radiated through the ground. Vibration can result from a source (e.g., train operations, motor vehicles, machinery equipment, etc.) causing the adjacent ground to

move, thereby, creating vibration waves that propagate through the soil to the foundations of nearby buildings. This effect is referred to as ground-borne vibration. Ground-borne vibration is measured as peak particle velocity (PPV) in inches per second. The general human response to different levels of ground-borne vibration velocity levels is described below in **Table 14** while ground-borne vibration levels that could induce potential damage to buildings are identified in **Table 15**. Examples of typical construction equipment related to roadway projects and their associated vibration levels are identified in **Table 16**.

Table 14 Human Response to Levels of Groundborne Vibration

	Maximum PPV in Inches per Second	1
Human Response	Transiant Courses	Continuous/FrequentIntermittent
	Transient Sources	Sources
Barely Perceptible	0.035	0.01
Distinctly Perceptible	0.24	0.04
Strongly Perceptible	0.9	0.1
Severe	2	0.4

Source: (California Department of Transportation, 2013)

Table 15 Groundborne Vibration Damage Potential Criteria

	Maximum PPV in Inches per Second			
Structure and Condition	Transient Sources	Continuous/FrequentIntermittent Sources		
Extremely Fragile Historic Buildings, Ruins, Ancient Monuments	0.12	0.08		
Fragile Buildings	0.2	0.1		
Historic and Some Old Buildings	0.5	0.25		
Older Residential Structures	0.5	0.3		
New Residential Structures	1	0.5		
Modern Industrial/Commercial Buildings	2	0.5		

Source: (California Department of Transportation, 2013)

Table 16 Construction Equipment-Related Groundborne Vibration

Equipment	PPV at 40 feet (inches per second)
Vibratory roller	0.125
Large bulldozer	0.053
Caisson Drilling	0.053
Loaded Trucks	0.045
Jackhammer	0.021
Small Bulldozer	0.002

Source: (California Department of Transportation, 2013)

Construction activities would include clearing, grubbing, construction of a temporary weather crossing,

grading, excavation, drilling and installation of the secant pile wall, and backfill and channel restoration. The nearest residential property is located approximately 40 feet to the northwest of the project area. According to **Table 16**, the groundborne vibration levels for typical construction equipment used would range from 0.021 ppv to 0.125 ppv. This level of groundborne vibration would be perceptible to nearby sensitive receptors according to **Table 14**. In addition, this level of vibration would not damage any structures in the area according to **Table 15**. Following project completion, groundborne vibration levels would return to existing conditions. The implementation of **BIO-20** and **NOI-1** through **NOI-3** would minimize impacts related to groundborne vibration. Therefore, the project would result in a less than significant impact related to groundborne vibration.

c. For a project located within the vicinity of a private airstrip or an airport land use plan, or, where such a plan has not been adopted, within two miles of a public airport or public-use airport, would the Project expose people residing or working in the Project Area to excessive noise levels?

**No Impact.** The project would rehabilitate a deficient bridge located in a rural portion of Ventura County. The project would not include construction of, or indirectly result in the construction of, noise sensitive land uses in the vicinity of an airstrip or airport. Therefore, the project would result in no impact on an airport land use plan.

#### **Avoidance and Minimization Measures**

- **NOI-1** Limit hours of hand-held equipment use. Use of loud hand-held construction equipment, such as chain saws, heavy-duty construction equipment, and trucks shall not occur between the hours of 7:00 p.m. and 7:00 a.m., except for dredging, slurrying, and associated water, conveyance activities, which are planned to occur 24 hours a day, 7 days a week.
- **NOI-2** Limit hours of heavy-duty equipment use. Within the City of Santa Paula, use of heavy-duty construction equipment or trucks shall not occur between the hours of 7:00 p.m. and 10:00 a.m.
- **NOI-3** Use of electric motors. The construction contractor shall use electric motors to the extent feasible for all stationary equipment (i.e., pumps). Stationary equipment shall be enclosed to limit impacts to recreational users.
- NOI-4 Use of hearing protection. Hearing protection shall be provided to all worksite personnel as needed for Construction During general construction activities to meet the requirements of OSHA standards (29 CFR 1910.95, Subpart G) and U.S. EPA standards. In the event of complaints by worksite personnel, a Noise Monitoring Program shall be implemented as discussed in OSHA 29 CFR 1910.95, Subpart G, Appendix G.
- NOI-5 Public notice of construction. The construction contractor shall provide advance notice of the start of construction for the project to all residences within one mile of the main construction area (i.e. Bridge Road Bridge). The announcement shall state specifically where and when construction will occur and provide contact information for public questions or comments. The construction contractor shall serve as the contact person in the event that noise levels during construction become disruptive to local residents. A sign shall be posted at the various sites with the contact phone number, and include general contact information for public questions or comments.

NOI-6 Noise monitoring. In the event of complaints by local residents, the construction contractor shall monitor noise from construction activity. Noise shall be measured at the exterior wall(s) of those residents filing a complaint or a representative location. In the event that construction noise exceeds the specified limits (1-hour Leq of 55 dBA), the responsible construction activity shall cease until appropriate measures are implemented to reduce noise levels to the extent feasible.

## 14. Population and Housing

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than- Significant Impact	No Impact		
Wo	Would the Project:						
a.	Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?						
b.	Displace a substantial number of existing people or housing units, necessitating the construction of replacement housing elsewhere?				⊠		

### **Environmental Setting**

The project area is located approximately 1.5 miles north of the city of Santa Paula, within unincorporated Ventura County. According to the U.S. Census, the 2018 population estimate within Ventura County was approximately 850,967 people and has increased steadily since 2010 (United States Census Bureau, 2019). There are existing single-family dwellings south of Bridge Road Bridge. However, the majority of the land use surrounding the project area consists of agricultural land and open space. The bridge provides the only access road to approximately 12 properties east of Santa Paula Creek (Michael Baker International, 2019a). Bridge Road is a local road in the County road system. There are no residential structures within the project area. The closest residential property is 40 feet away from the project area.

## **Discussion of Checklist Responses**

#### a. Would the project induce Population Growth?

**No Impact.** The project would not include the construction of new homes and businesses. Construction workers would be present for a temporary period of time but are not expected to contribute to population growth in the project area. Construction activities would be limited to improvements to an existing transportation facility and the project would not result in the extension of roads or other infrastructure to undeveloped areas. Direct and indirect population growth from construction of the proposed project is not anticipated. Therefore, the project would result in no impact on population growth.

## b. Would the project displace Population or Housing?

**No Impact.** The project would be completed within existing ROW. A temporary construction easement (TCE) and permanent easements would be required; the permanent easements would be from two private parcels (APNs 040-0-120-250 and 040-0-100-195), and permissible access could be required from six private parcels. However, the TCE and permanent easement would not displace any existing housing or people. The project would not result in the demolition of existing housing that would require the construction of replacement housing. Therefore, the project would result in no impact on housing in the area.

## 15. Public Services

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than- Significant Impact	No Impact
Wo	ould the Project:				
a.	Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the following public services:  Fire protection?  Police protection?				
	Schools? Parks? Other public facilities?				

## **Environmental Setting**

The project area is in a rural area of Ventura County. Emergency services that service the project area include:

- Fire Protection: Ventura County Fire Department; 12727 Santa Paula Ojai Rd, Santa Paula, CA 93060
- Police Protection: Santa Paula Police Department; 431 N 13th St, Santa Paula, CA 93060

There nearest school to the project area is Mupu School, approximately 0.2 mile away. The County currently operates 23 parks and recreation facilities (County of Ventura, Regional Recreation System, 2014). The nearest County operated recreational facility to the project area is Dennison Park and is approximately 12 miles west. The city of Santa Paula, which is two miles south of the project area, operates 12 recreational facilities. The recreational area operated by the city of Santa Paula that is nearest to the project is Mills Park, located approximately two miles southeast of the project area (City of Santa Paula, Parks, n.d.)

## **Discussion of Checklist Responses**

#### a. Response to Question a-i) – a-v):

**No Impact.** The project would include rehabilitation of Bridge Road Bridge and construction of the scour protection measure for safety purposes. The project would not be capacity-increasing or result in regional or community growth. The project would not result in the need for new or physically altered governmental facilities and services that could lead to additional environmental impacts in the project region. The project would improve the safety and ensure continuation of access to service areas for existing public services in the community. Service ratios for fire protection, police protection, schools, parks, and other community services would maintain at existing ratios and performance. Therefore, the project would result in no impact on government facilities, service ratios, or public service response times.

## 16. Recreation

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than- Significant Impact	No Impact			
Wo	Would the Project:							
a.	Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?							
b.	Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?							

## **Environmental Setting**

The County currently operates 23 parks and recreation facilities (County of Ventura, Regional Recreation System, 2014). The nearest County operated recreational facility to the project area is Dennison Park and is approximately 12 miles west of the project area. The city of Santa Paula, which is two miles south of the project operates 12 recreational facilities. The nearest recreational facility to the project area is Mills Park, located approximately two miles southeast of the project area (City of Santa Paula, Parks, n.d.).

## **Discussion of Checklist Responses**

## a. Increase Use of Existing Parks or Recreational Facilities?

**No Impact.** The project does not include recreational facilities and there are no existing recreational uses on the project area. The project would not include residential development. Therefore, development of the project would not increase the potential number of residents within Santa Paula that would increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. In addition, the project would not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. Therefore, the project would result in no impact on regional, neighborhood parks, or recreational facilities.

## b. Creation of New or Altered Recreational Facilities?

**No Impact.** See discussion in response (a) above.

## 17. Transportation

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than- Significant Impact	No Impact			
Wo	Would the Project:							
a.	Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?			$\boxtimes$				
b.	Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?							
c.	Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or							
d.	incompatible uses (e.g., farm equipment)? Result in inadequate emergency access?			$\boxtimes$				

### **Environmental Setting**

#### Site Access

Access to the project area is provided by SR-150. SR-150 runs from the U.S. Highway 101, a freeway which provides regional access, to State Route 126 (SR-126).

## **Bicycle Facilities**

According to the General Plan, in total, the County maintains 58.2 miles of bike lanes – all but 1.56 miles are located within the shared roadway right-of-way (Class II or Class III). There are currently no Class IV bike facilities in the unincorporated areas of the county. Bicycle facilities are defined using the following classification scheme (Ventura County, 2020):

- Class I: A Class I bike path provides a completely separated right-of-way for the exclusive use of bicycles and pedestrians with crossflow by motorists minimized.
- Class II: A Class II bike lane provides a striped lane for one-way bike travel on a street or highway and is typically designated by bike lane signs and markings.
- Class III: A Class III bike route provides a shared use area with pedestrian traffic or motor vehicle traffic (i.e., paved shoulder) and is typically designated with a bike route sign.
- Class IV: A Class IV bike lane provides a separated bike lane, or "protected bike lane" with a physical barrier between the bike lane and the adjacent travel lanes, parking lanes, and sidewalks. Class IV may be one-way or two-way. Separated bike lanes can be separated from motor vehicle traffic by raised medians, concrete curbs, landscaping, on-street parking, bollards, flexible delineator posts or by a change in elevation between the bike lane and travel lane. Providing a striped buffer between the bike lane and travel lane (i.e., no physical barrier) with restricted parking can provide the same additional separation between cyclists and motor vehicles where traditional Class IV facilities are not feasible and where Class II facilities are not adequate.

There are currently no bicycle facilities in the project area or surrounding area. However, along SR-150 there is a proposed Class Three Signed Bicycle Route (Ventura County Transportation Commission, 2007).

## **Ventura County General Plan**

#### Goals:

• To ensure the design, construction, and maintenance of a safe and efficient roadway system for the movement of persons and goods.

## **Policies:**

- The County shall require evaluation of General Plan land use designation changes, zone changes, and discretionary development for their individual (i.e., project-specific) and cumulative transportation impacts based on Vehicle Miles Traveled (VMT) under the CEQA pursuant to the methodology and thresholds of significance criteria set forth in the County Initial Study Assessment Guidelines. (RDR)
- The County shall maintain LOS standards for use as part of the County's transportation planning including the traffic impact mitigation fee program, and the County's review and consideration of proposed land use legislation and discretionary development. For purposes of County transportation planning and review and consideration of proposed land use legislation and discretionary development, the County shall use the following minimum acceptable LOS for road segment and intersection design standards within the Regional Road Network and all other County-maintained roadways:
  - LOS-'C' for all Federal functional classification of Minor Collector (MNC) and Local roadways (L); and
  - o LOS-'D' for all Federal functional classifications except MNC and L, and Federal and State highways in the unincorporated area, except as otherwise provided in subparagraph;
  - LOS-'E' for State Route 33 between the northerly end of the Ojai Freeway and the city of Ojai, Santa Rosa Road, Moorpark Road north of Santa Rosa Road, State Route 34 north of the city of Camarillo, and State Route 118 between Santa Clara Avenue and the city of Moorpark;
  - o LOS 'F' for Wendy Drive between Borchard Drive to Lois Avenue; and
  - The LOS prescribed by the applicable city for all federal highways, state highways, city thoroughfares and city-maintained local roads located within that city, if the city has formally adopted and is implementing a General Plan policy, ordinance, or a reciprocal agreement with the County regarding development in the city that is intended to improve the LOS of County-maintained local roads and federal and state highways located within the unincorporated area of the county.
  - At any intersection between two or more roads, each of which has a prescribed minimum acceptable LOS, the lower LOS of the roads shall be the minimum acceptable LOS for that intersection

#### **Discussion of Checklist Responses**

a. Would the project conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

**Less Than Significant Impact.** The project would not conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system. There would be continuous access throughout construction of the project and the project would not result in an increase of VMT or degradation of existing LOS standards during construction or operation of the project. The project would rehabilitate a structurally deficient bridge along Bridge Road in order to provide a safe,

functional, and reliable crossing over Santa Paula Creek. The project would ensure continued vehicular safety and reliable accessibility along Bridge Road, and it would not increase traffic along the roadway in relation to the existing traffic capacity. Therefore, the project would result in a less than significant impact on program plans, ordinances, or policies addressing the circulation system.

- **b.** Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)? **No Impact.** There would be continuous access throughout construction of the project and the project would not result in an increase of VMT or degradation of existing LOS standards during construction or operation of the project. The project would ensure continued vehicular safety and reliable accessibility along Bridge Road, and it would not increase traffic along the roadway in relation to the existing traffic capacity. Therefore, the project would result in no impact on CEQA section 15064.3, subdivision (b).
- c. Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

**Less Than Significant Impact.** The project would include bridge rehabilitation and addition of scour protection measure on the existing bridge that has been determined as functionally obsolete and received a low sufficiency rating during the most recent bridge inspection by Caltrans. The proposed bridge would be slightly different in design from the existing bridge, but functionally safer. Therefore, the project would result in less than significant impact related to geometric hazards.

### d. Result in inadequate emergency access?

**Less Than Significant Impact.** Ventura County Emergency Operation Plan includes steps for response in the case of an emergency (County of Ventura, Emergency Operations Plan, 2013). The steps are the following.

- Evacuation of threatened populations to safe areas
- Advising threatened populations of the emergency and apprising them of safety measures to be implemented
- Advising adjacent jurisdictions (Los Angeles and Santa Barbara Operational Areas) of the emergency
- Identifying the need for mutual aid and requesting such through the appropriate, established chain and the California Emergency Management Agency Southern Region
- Proclamation of a Local Emergency by the Sheriff (As Director of Emergency Services), ratified by the County Board of Supervisors (See Management Support Documentation)

During the four month construction period, it is anticipated that Bridge Road would be partially closed during working hours; however, the roadway would remain open to through-traffic during non-working hours to maintain continuous access for local residents. Therefore, the project would result in a less than significant impact on emergency access.

## 18. Tribal Cultural Resources

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than- Significant Impact	No Impact
Wo	uld the Project cause a substantial adverse				
	nge in the significance of a tribal cultural				
	ource, defined in Public Resources Code				
	tion 21074 as either a site, feature, place,				
	ural landscape that is geographically defined				
	erms of the size and scope of the landscape,				
	red place, or object with cultural value to a				
Call	fornia Native American tribe, and that is: Listed or eligible for listing in the California				
	Register of Historical Resources, or in a local	_	_	_	_
a.	register of historical resources as defined in			$\boxtimes$	
	Public Resources Code section 5020.1(k), or				
	A resource determined by the lead agency,				
	in its discretion and supported by substantial				
	evidence, to be significant pursuant to				
	criteria set forth in subdivision (c) of Public				
b.	Resources Code Section 5024.1. In applying		П	$\boxtimes$	П
υ.	the criteria set forth in subdivision (c) of		Ш		
	Public Resources Code Section 5024.1, the				
	lead agency shall consider the significance of				
	the resource to a California Native American				
	Tribe.				

## **Environmental Setting**

#### **Cultural and Archeological Resources**

An ASR was prepared in a manner consistent with Caltrans' regulatory responsibilities pursuant to the January 2014 First Amended Programmatic Agreement among the Federal Highway Administration, the Advisory Council on Historic Preservation, the California State Historic Preservation Officer, and the California Department of Transportation regarding Compliance with Section 106 of the National Historic Preservation Act, as it Pertains to the Administration of the Federal-Aid Highway Program in California (Section 106 PA). The study was also completed in accordance with Section 15064.5(a)(2)-(3) of the CEQA Guidelines, using the criteria outlined in Section 5024 of the California PRC.

A records search, background research, Native American consultation, and a field survey were conducted. The field survey of the APE was completed by DUKE CRM staff archaeologist on February 26, 2021. A single cultural resource was identified within the APE as a result of background research and pedestrian survey: Bridge Road Bridge. Analysis of geology, soils, and the background cultural research indicate the portions of the APE outside the side drainage are moderately sensitive for the presence of cultural resources. However, the portion of the APE subject to direct disturbance from project implementation is unlikely to contain previously unidentified cultural resources.

The records search identified six cultural resources and 12 archaeological studies within 0.5 mile of the APE. The records search indicated that, aside from the Bridge Road Bridge no other previously recorded cultural resources are located within the APE. However, two cultural resource sites are mapped directly adjacent to the APE (within 50 feet). One of the cultural resource sites mapped contained a displaced boulder with a grinding slick and mortar. The second site contained a light scatter of marine shell.

However, during surveys of the APE and surrounding area, these sites were not observed, and it was determined that any previously recorded prehistoric archaeological sites adjacent to the APE are assumed to no longer be present. Besides Bridge Road Bridge, there are no prehistoric or historic archaeological resources were discovered within the direct APE as a result of background research and field survey.

#### **Discussion of Checklist Items**

a. Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?

Less Than Significant Impact. Due to the nature of previous ground disturbances within the APE for the rehabilitation of Bridge Road Bridge and existing road, and the relatively small amount of new horizontal ground disturbances, there remains a low potential to adversely affect unknown, potentially intact buried archaeological deposits that might be eligible for NRHP listing. In addition, construction of the project would include ground disturbing activities that could unearth tribal cultural resources should they be present in the project limits. Tribal cultural resources could include, but are not limited to, Native American human remains, funerary objects, items or artifacts, sites, features, places, landscapes, or objects with cultural values to the Tribe. However, with the implementation of the avoidance and minimization measure CUL-2, the project would result in less than significant impacts to tribal cultural resources.

b. Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is listed in Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe.

**Less Than Significant Impact**. See discussion in response (a) above.

## 19. Utilities and Service Systems

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than- Significant Impact	No Impact
Wo	ould the Project:				
a.	Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?			⊠	
b.	Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?  Result in a determination by the wastewater			⊠	
C.	treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?				$\boxtimes$
d.	Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?				
e.	Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?				

#### **Discussion of Checklist Responses**

a. Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Less Than Significant Impact. There is an existing roadway drainage pipe approximately 75 feet upstream from the west side of the bridge that would be moved to avoid further erosion. During construction, temporary modifications to the Santa Paula Creek channel and the use of construction equipment on the Santa Paula Creek banks have the potential to degrade water quality by increasing the amount of disturbed substrate and total suspended solids. This relocation of the drainage pipe would result in minimal impacts and would not result in additional impacts beyond what is anticipated to result from the rest of project construction. The project would include rehabilitation of the existing bridge and would not necessitate new or expanded utilities. Therefore, the project would result in a less than significant impact on utilities.

b. Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

**Less Than Significant Impact.** Project construction would require the use of a minimal amount of water for dust control, compacting material for the road base and subgrade, and dewatering drillholes. Operation of the project would not require the use of any water. Therefore, the project would result in a less than significant impact related to water supplies available to serve the project and reasonably foreseeable future development.

c. Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

**No Impact.** The project would not require the need for wastewater treatment. Therefore, the project would result in no impact on wastewater treatment capacity.

- d. Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?
   Less Than Significant Impact. Solid waste from the project would be collected and disposed of at one or more of the following landfills and transfer stations:
  - SA Recycling, Oxnard
  - Santa Clara Valley Disposal, Ventura
  - Vulcan materials, Oxnard
  - Granite Plant, Santa Paula

No solid waste would be generated during project operation. Therefore, the project would not cause a permanent increase in solid waste generation. All solid-waste-generating activities within County are subject to the requirements set for in California AB 939 (California Integrated Waste Management Act), which requires each city and county to divert 50 percent of its solid waste from landfill disposal through source reduction, recycling, and composting. Subsequently, Senate Bill 1016 (The Solid Waste Disposal Measurement Act) was implemented to provide a simplified measure of a jurisdiction's performance in accordance with AB 939 by moving to a per capita disposal rate. In addition, County Ordinance 4421 requires permit applicants working on construction and demolition projects within the unincorporated areas of the County to practice waste prevention. The project would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impar the attainment of solid waste reduction goals. In addition, the project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste. Therefore, the project would result in a less than significant impact on solid waste management, regulations, generation, and local infrastructure capacity.

e. Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

**No Impact.** Operation of the project would not result in the long-term generation or disposal of solid waste The disposal of solid waste during construction would be short-term, and would be conducted in compliance with federal, state, and local statues and regulations related to solid waste. Therefore, the project would result in no impact on management and regulations related to solid waste.

#### 20. Wildfire

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than- Significant Impact	No Impact
If lo	ocated in or near state responsibility areas				
	ands classified as very high fire hazard				
sev	rerity zones, would the project:				
a.	Substantially impair and adopted emergency response plan or emergency evacuation plan?				
b.	Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?			⊠	
c.	Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?				
d.	Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?			×	

#### **Environmental Setting**

#### Ventura County General Plan

As outlined in the Hazards and Safety Element of the General Plan, the following safety goals and policies would apply to the project (County of Ventura Resource Management Agency Planning Division, 2019). **Goals:** 

To improve the resilience of the County to wildfire risk by locating, designing, and constructing
development in a manner that minimizes the risk, and by providing effective fire prevention,
suppression, and rescue services and facilities.

#### **Policies:**

• The County shall assemble an interagency team as needed to maintain response plans and coordinate the management of resources following wildfire events.

#### **Ventura County Emergency Operations Plan**

Ventura County Emergency Operation Plan includes steps for response in the case of an emergency (County of Ventura, Emergency Operations Plan, 2013). The steps are the following.

- Evacuation of threatened populations to safe areas
- Advising threatened populations of the emergency and apprising them of safety measures to be implemented
- Advising adjacent jurisdictions (Los Angeles and Santa Barbara Operational Areas) of the emergency

- Identifying the need for mutual aid and requesting such through the appropriate, established chain and the California Emergency Management Agency Southern Region
- Proclamation of a Local Emergency by the Sheriff (As Director of Emergency Services), ratified by the County Board of Supervisors (See Management Support Documentation)

#### **Discussion of Checklist Responses**

a. Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

**Less Than Significant Impact.** During the four month construction period, it is anticipated that Bridge Road would be partially closed during working hours; however, the roadway would remain open to throughtraffic during non-working hours to maintain continuous access for local residents. Therefore, the project would result in a less than significant impact on an adopted emergency plan or emergency evacuation plan.

b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

Less Than Significant Impact. The majority of the project area is in a Moderate Fire Hazard Zone of state responsibility; the northwest and southwest corners of the project area are in high fire hazard zone. In addition, directly adjacent to the project area, there are areas zoned State Responsibility Very High Fire Hazard. The presence of construction equipment and fuel sources could temporarily exacerbate fire risk in the project area. Avoidance and minimization measures WDF-1 through WDF-4 would be implemented to provide provisions and guidance in fire prevention. However, with the implementation of WDF-1 through WDF-4, the project would result in less than significant impacts related to wildfire pollutant.

c. Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

**No Impact**. The project would not require the installation or maintenance of any associated infrastructure that may exacerbate fire risk or result in temporary or ongoing impacts to the environment. Therefore, the project would result in no impact related to risk of fire from associated infrastructure.

d. Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

**Less Than Significant Impact.** See discussion in response (b) above.

#### Avoidance, Minimization, and/or Mitigation Measures

- **WDF-1** A Construction Fire Prevention Plan would be prepared and approved by the Ventura County Fire Protection District. The Construction Fire Prevention Plan would implement fire safety measures during construction activities in compliance with applicable subsections of Chapter 33 of the 20191 California Fire Code, the National Fire Protection Association Standard 51B, and the Section 4442 of the California PRC.
- WDF-2 Hot work would cease during Red Flag Warning periods declared by the National Weather Service.
- WDF-3 In the event of a fire on the project area, all construction activities would immediately stop, the

Bridge Road Bridge Rehabilitation and Scour Mitigation Project

construction crew would immediately use the onsite fire extinguishers and the water truck to extinguish the fire, dial 911.

**WDF-4** Contractor would comply with the fire protection provisions contained in Caltrans Standard Specifications No. 7-1.02(m).

## 21. Mandatory Findings of Significance

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than- Significant Impact	No Impact
a.	Does the Project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?				
b.	Does the Project have impacts that are individually limited but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a Project are considerable when viewed in connection with the effects of past Projects, the effects of other current Projects, and the effects of probable future Projects.)		⊠		
c.	Does the Project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?		×		

#### **Environmental Setting**

#### **Discussion of Checklist Responses**

a. Does the Project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop belowself-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?

**Less Than Significant with Mitigation Incorporated.** As described in *Section 5, Biological Resources*, implementation of measures **BIO-1** through **BIO-40** would reduce impacts to less than significant. In addition, *Section 5.5 Cultural Resources* describes measures **CUL-1** and **CUL-2** which would avoid and minimize impacts on cultural and tribal cultural resources. Therefore, the project would result in less than significant impact on the quality of the environment, fish or wildlife species habitat, fish or wildlife population, plant or animal communities, number or restricting the range of a rare or endangered plant or animal, or important examples of the major periods of California history or prehistory.

b. Does the Project have impacts that are individually limited but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a Project are considerable when viewed in connection with the effects of past Projects, the effects of other current Projects, and the effects of probable future Projects.)

**Less Than Significant with Mitigation Incorporated**. The evaluation of the project would not result in any significant impacts with the implementation of measures mentioned in *Section 5 Biological Resources* that would reduce impacts to less than significant. The remaining environmental issue areas did not identify

any potential significant impacts. Therefore, with implementation of measures **BIO-1** through **BIO-40**, the project's contribution to cumulative impacts would be less than cumulatively considerable. **Table 17** provides a summary of projects within two miles of the project area, which is used in the cumulative impact analysis.

Table 17 Projects within Two Miles

Permit Number	Project Limits	Project Description	Project Location in Relation to Project Area	Status
PL21-0088	7944 Pinegrove Rd, Ventura County Unincorporated	Request to reinstate Conditional Use Permit 5101 (as modified by LU10-0123) an expired Conditional Use Permit authorizing a stealth wireless communication facility (WCF). The WCF consists of a faux 50-ft tall water tank with panel antennas mounted on exterior brackets below the 50-ft elevation. The faux water tank and associated telecommunication equipment are contained within a 1000 sq. ft. fenced lease area. The equipment is located on an existing concrete pad. The facility is unmanned except for periodic maintenance and does not require water to operate. Access to the facility is via an unpaved road off Pine Grove Road and the site is addressed as 7944 Pine Grove Road in the Santa Paula Area	This project is located approximately two miles northeast of the project area.	Preparing for a hearing

Source: (County of Ventura Resource Management Agency Planning Division, 2022)

# c. Does the Project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?

Less Than Significant with Mitigation Incorporated. The Initial Study analysis shows that the project would not have environmental effects causing substantial adverse effects on human beings, directly or indirectly. Impacts associated with air quality, biological resources, cultural resources, greenhouse gases, and wildfire would all be reduced to a less than significant level with implementation of avoidance, minimization, and/or mitigation measures AQ 1 through AQ-9; BIO-1 through BIO-38; CUL 1-2; GEO-1 and GEO-2; GHG-1; NOI-1; WQ-1 through WQ-8; and WDF 1 through WDF-4. Therefore, the project would result in less than significant impacts with mitigation incorporated on human beings, either directly or indirectly.

# VI. RESPONSE TO COMMENTS ON DRAFT IS/MND

The County made the Draft IS/MND and Notice of Availability/Notice of Intent (NOA/NOI) available for review on the County's website at: <a href="https://www.vcpublicworks.org/2022/06/09/notice-of-intent-mnd">https://www.vcpublicworks.org/2022/06/09/notice-of-intent-mnd</a> and from 8:00 a.m. to 5:00p.m., Monday through Friday, at the County of Ventura Government Center, Survey Counter, which is located at 800 South Victoria Avenue, Ventura CA 93009. The NOA/NOI was posted in the Ventura County Star and published with the Ventura County Clerk Recorder, wherein it invited public review of the document. The NOA/NOI was also mailed to property owners, stakeholders, and residents within the project vicinity.

The County invited public comments (by mail or email) during the public review period, which was from June 20, 2022 and closed on July 20, 2022 (a total of 30 days), pursuant to CEQA Guidelines Section 15105(b). The Draft IS/MND, NOA, and Notice of Completion (NOC) were posted with the State Clearinghouse. The State Clearinghouse submitted the documents to selected state agencies for review. The review period closed on July 20, 2022.

The County received one comment letter in response to the NOA/NOI during the public review period, and one comment letter after the public review period. The written letters are included on the following the pages as Letter 1 and Letter 2, and responses to comments follow the written letters. Textual changes in the Draft IS/MND were required to respond to the comments.



State of California – Natural Resources Agency
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July 20, 2022

www.wildlife.ca.gov

Mr. Christopher Solis County of Ventura 800 South Victoria Avenue Ventura, CA 93009 christopher.solis@ventura.org

Subject: Bridge Road Bridge Scour Rehabilitation Project, Mitigative Negative Declaration, SCH No. 2022060410; City of Santa Paula, Ventura County

Dear Mr. Solis:

The California Department of Fish and Wildlife (CDFW) has reviewed Ventura County's (County) Mitigative Negative Declaration (MND) for the Bridge Road Scour Rehabilitation Project (Project). The County, as Lead Agency, prepared a MND pursuant to the California Environmental Quality Act (CEQA; Pub. Resources Code, § 21000 et. seq.) with the purpose of informing decision-makers and the public regarding potential environmental effects related to the 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; Public 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.

Mr. Christopher Solis County of Ventura July 20, 2022 Page 2 of 25

#### **Project Description and Summary**

**Objective:** The Project as proposed will include rehabilitation of the Bridge Road bridge. Project actions include stream diversion, ground excavation, dewatering, and the installation of a secant pile wall within the stream bed. A temporary low water crossing will be constructed downstream of the bridge at Fair Weather Crossing to allow construction vehicle access during Project activities. A culvert would be placed under the temporary crossing to maintain creek flows. Additionally, a temporary ramp would be constructed on the northeast side of the bridge. Following the conclusion of construction, the temporary crossing and the temporary access ramp would be removed. The native soil would be re-graded similar to pre-project contours. Vegetation within the creek would be removed during Project activities.

**Location:** The Project is located in the City of Santa Paula in the County of Ventura. Project activities will occur between Bridge Road and Fairview Road within and surrounding Santa Paula Creek. The Project site within the Santa Monica-Sierra Madre wildlife corridor and the bridge at Bridge Road functions as a wildlife crossing area. The surrounding area consists of the City of Santa Paula to the southwest and the Los Padres National Forest to the north, east, and west.

#### **Comments and Recommendations**

CDFW offers the comments and recommendations below to assist the County in adequately identifying, avoiding, and/or mitigating significant, or potentially significant, direct and indirect impacts on fish and wildlife biological resources based on the planned activities of this proposed Project. CDFW recommends the measures below be included in a science-based monitoring program with adaptive management strategies as part of the Project's CEQA mitigation, monitoring and reporting program (Public Resources Code, § 21081.6 and CEQA Guidelines, § 15097). Additional comments or other suggestions may also be included to improve the document.

#### **Specific Comments**

# Comment #1: Impacts to Aquatic and Riparian Resources, Lake and Streambed Alteration Agreement (LSA)

**Issue:** The Project will result in direct and indirect impacts to Santa Paula creek and associate riparian and wetland vegetation.

**Specific Impacts:** CDFW is concerned that project activities within and surrounding Santa Paula creek may result in changes to the stream and/or the associated sensitive riparian vegetation communities which are subject to Fish and Game Code.

Why impacts would occur: Project implementation includes grading, excavating, material staging, grubbing, and vegetation clearing which may result in direct mortality and loss of sensitive vegetation communities and special status wildlife. The Project occurs within Santa Paula Creek, a perennial creek which functions as a major tributary to the lower Santa Clara River. Both Santa Paula creek and the Santa Clara River support numerous special status plant

Mr. Christopher Solis County of Ventura July 20, 2022 Page 3 of 25

and animal species. Endangered Species Act (ESA)-listed and CESA-candidate species Southern California steelhead (*Oncorhychus mykiss*), State Species of Special Concern (SSC) arroyo chub, and SSC California red-legged frog may be present within Santa Paula Creek, adding to its ecological value.

Moreover, the following riparian and wetland vegetation alliances addressed within the MND are considered sensitive and/or locally important: Populus fremontii-Quercus agrifolia forest association (S3.2/G4); Salix laevigata woodland alliance (S3/G4); Quercus agrifolia woodland alliance (S4/G4); Baccharis salicifolia shrubland alliance (S4/G4); Salix lasiolepis shrubland alliance (S4/G4); and Salix exigua shrubland alliance (S4.2/G5). Riparian habitats provide important food, nesting habitat, cover, and migration corridors for wildlife. Only 5 to 10% of California's original riparian habitat exists today and much of the remaining habitat is in a degraded condition. Increased sediment deposition can bury seedlings and saplings of riparian trees, resulting in increased mortality of new recruits (Kui and Stella 2016). Construction equipment, vehicles, import of fill material, disposal piles, and staging areas can introduce and spread non-native, invasive plants. Invasive plant seeds, rhizomes, or stolons can be transported along streams and spread upstream and downstream. Impacts to sensitive vegetation communities should be considered significant under CEQA unless they are clearly mitigated below a level of significance. Inadequate avoidance, minimization, and mitigation measures for impacts to sensitive plant communities will result in the Project continuing to have a substantial adverse direct, indirect, and cumulative effect, either directly or through habitat modifications, on any special status species or sensitive vegetation community.

**Evidence impacts would be significant:** 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. The Project may adversely affect the existing hydrology pattern of the Project site as well as downstream. This may occur through the alteration of flows to streams, impacting biological resources both on-site and off-site.

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

**Mitigation Measure #1:** CDFW concurs with the Project's statement to notify CDFW pursuant to Fish and Game Code, section 1600 *et seq.* The Project should notify prior to any Project construction or activities. Based on this notification and other information, CDFW determines whether a LSA with the applicant is required prior to conducting the proposed activities. Please visit the Lake and Streambed Alteration Program (<a href="https://wildlife.ca.gov/Conservation/Environmental-Review/LSA">https://wildlife.ca.gov/Conservation/Environmental-Review/LSA</a>) webpage to obtain a notification package for an LSA.

CDFW's issuance of an LSA 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 section 1600 *et seq.* and/or under CEQA, the CEQA document should fully identify the potential impacts to the streams or riparian resources and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the LSA.

Mr. Christopher Solis County of Ventura July 20, 2022 Page 4 of 25

**Mitigation Measure #2:** Any LSA Agreement issued for the Project by CDFW may include additional measures protective of streambeds on and downstream of the Project such as additional erosion and pollution control measures. To compensate for any on-site and off-site impacts to riparian resources, additional mitigation conditioned in any LSA Agreement may include the following: avoidance of resources, on-site or off-site creation, enhancement, or restoration, and/or protection and management of mitigation lands in perpetuity.

**Mitigation Measure #3:** CDFW recommends fully avoiding impacts to waters and riparian/wetland vegetation communities. If feasible, CDFW recommends redesigning the Project to avoid impacts to the existing drainage features that support sensitive vegetation communities. Design alternatives should attempt to retain as much surface flow and natural hydrologic processes as possible. CDFW recommends taking an inter-disciplinary approach to involve landscape architects, engineers, and wildlife biologists, and hydrologists to develop design alternatives that could fully avoid or lessen impacts to waters and riparian/wetland vegetation communities.

**Mitigation Measure #4:** If impacts to streams are unavoidable, CDFW recommends that mitigation occur at a CDFW-approved bank. Mitigation bank credits should be purchased, approved, or otherwise fully executed prior to implementing Project-related ground-disturbing activities and prior to the County's issuance of grading permits.

**Mitigation Measure #5:** If credits at a CDFW-approved mitigation bank are not available, CDFW recommends setting aside replacement habitat to 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. Mitigation lands should be in the same watershed as the Project site and support in-kind vegetation. An appropriate non-wasting endowment should be provided for the long-term management of mitigation lands. A conservation easement and endowment funds should be fully acquired, established, transferred, or otherwise executed prior to implementing Project-related ground-disturbing activities prior to the County's issuance of grading permits.

**Mitigation Measure #6:** If avoidance is not possible, sensitive plant communities ranked S3 (*Populus fremontii-Quercus agrifolia* forest association & *Salix laevigata* woodland alliance) impacted by development or fuel modification should be mitigated at no less than 5:1. Sensitive plant communities ranked S4 (*Salix exigua* shrubland alliance; *Quercus agrifolia* woodland alliance; *Baccharis salicifolia* shrubland alliance; and *Salix lasiolepis* shrubland alliance) be mitigated for at no less than 3:1. The Project proponent should mitigate at a ratio sufficient to achieve a no-net loss for impacts to special status plant species and their associated habitat. CDFW recommends that an on-site Habitat Mitigation and Monitoring Plan (HMMP) be developed. An HMMP should provide specific, detailed, and enforceable measures.

**Mitigation Measure #7:** CDFW recommends that all on-site mitigation sites for impacts to waters and riparian/wetland vegetation communities be protected in perpetuity from public encroachment and structural intrusion. This should include all water features on site, including ephemeral and perennial bodies.

CDFW recommends the Lead Agency/Project Proponent fund a minimum of five years of initial restoration and maintenance. If applicable, mitigation lands (unnamed creeks, surrounding

Mr. Christopher Solis County of Ventura July 20, 2022 Page 5 of 25

natural areas) should 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. An appropriate non-wasting endowment should be provided for the long-term management of mitigation lands. A conservation easement and endowment funds should be fully acquired, established, transferred, or otherwise executed prior to implementing Project-related ground-disturbing activities and prior to the County's issuance of grading permits.

**Recommendation #1:** The Project should be conditioned to fully avoid all impacts to Southern California steelhead. CDFW concurs that no work should occur in the stream channel or stream banks during the winter rainy season. However, within the MND it states that construction will be limited between June 15 and October 15, CDFW recommends this be changed to September 15-October 15 to avoid the nesting bird season.

#### Comment #2: Impacts to Southern California Steelhead (Oncorhychus mykiss)

**Issue:** Southern California steelhead have historically been present within Santa Paula Creek and may be impacted by Project activities.

**Specific Impacts:** Project activities may directly or indirectly impact Southern California steelhead, an ESA- and CESA-candidate species.

Why impacts would occur: Project activities include excavation, dewatering, and water diversion which may result in direct or indirect impacts to Southern California steelhead. Although a weir is present downstream of the development that could pose as an impediment to fish passage, Santa Paula is historically a Southern California steelhead stream. Additionally, habitat is available above the weir and downstream of the Santa Paula diversion which is within the Project area. On May 13, 2022, the California Fish and Game Commission provided public notice that Southern California steelhead is now a candidate species under CESA and as such, receives the same legal protection as a listed species.

Evidence impacts would be significant: Pursuant to Section 2074.2 of the Fish and Game Code, on April 21, 2022, the California Fish and Game Commission (Commission) determined that listing Southern California steelhead under CESA may be warranted (CDFWa 2022). This commences a one-year status review of the species, after which the Commission will make a decision whether listing of Southern California steelhead as under CESA is warranted. During the status review, Southern California steelhead is protected under CESA as a candidate species pursuant to Section 2085 of the Fish and Game Code, provided that notice has been given as required by Section 2074.4 of the Fish and Game Code. The CDPR is prohibited from undertaking or authorizing activities that result in take of any endangered, threatened, or candidate species, except as authorized by State law (Fish & Game Code, §§ 86, 2062, 2067, 2068, 2080, 2085; Cal. Code Regs., tit. 14, § 786.9).

CDFW considers adverse impacts to a species protected by CESA to be significant without mitigation under CEQA. Consequently, if the Project or any Project-related activity during the life of the Project will result in take of a species designated as endangered or threatened, or a candidate for listing under CESA, CDFW recommends that the Project proponent seek appropriate take authorization under CESA prior to implementing the Project. Appropriate authorization from CDFW may include an Incidental Take Permit (ITP) or a consistency

Mr. Christopher Solis County of Ventura July 20, 2022 Page 6 of 25

determination in certain circumstances, among other options [Fish & Game Code, §§ 2080.1, 2081, subds. (b) and (c)].

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

**Mitigation Measure #1:** The MND should analyze and discuss the Project's potential impact on Southern California steelhead population, habitat, substrate, and passage. The EIR should assess the potential impacts of habitat modification from Project activities, grading, removal of soil, and vegetation removal along stream banks. Additionally, the MND should assess the Project's effects on substrate composition within Santa Paula Creek. The MND should analyze the Project's effect on the hydrology and hydraulics (velocity, depth, and temperature) of Santa Paula Creek and how those effects may impact Southern California steelhead. An adequate analysis should provide the following information at a minimum:

- 1. Project effects on flow (cfs, acre-feet) and hydraulics (velocity, depth, dissolved oxygen, temperature, and wetted perimeter) during the wet season (November through March), dry season (April through October), and both above-average and below-average water year (i.e., wet season/above-average water year, wet season/below-average water year, dry season/above-average water year, and dry season/below-average water year) under pre-project (i.e., baseline conditions) and post-project conditions;
- 2. Percent changes in flow, velocity, depth, temperature, and wetted perimeter (acres gained/lost) under Project conditions;
- 3. Project effects on water quality (dissolved oxygen and turbidity) throughout the study reach under pre-project (i.e., baseline conditions) and post-project conditions:
- 4. Any Project-related temporal, partial, or total barriers that would impact fish passage for Southern California steelhead; and
- 5. Any additional potential effects to on-going habitat recovery and restoration efforts for Southern California steelhead on a local or regional scale.

**Mitigation Measure #2:** If "take" or adverse impacts to CESA- listed species cannot be avoided either during Project construction and/or over the life of the Project, the County should consult with CDFW to determine if a CESA ITP is required (pursuant to Fish & Game Code, § 2080 *et seq.*).

#### Comment #3: Impacts to California Species of Special Concern

**Issue:** CDFW is concerned that Project-related activities may result in significant impacts to the following SSC:

- Fish: arroyo chub (*Gila orcuttii*);
- Reptiles: two-striped garter snake (*Thamnophis hammondii*), coast horned lizard (*Phrynosoma blainvillii*), coastal whiptail (*Aspidoscelis tigris stejnegeri*), California

Mr. Christopher Solis County of Ventura July 20, 2022 Page 7 of 25

legless lizard (*Anniella spp.*), Southern California legless lizard (*Anniella stebbinsi*) and western pond turtle (*Emys marmorata*);

- Amphibians: California red-legged frog (Rana draytonii);
- Mammals: Pallid bat (Antrozous pallidus), and hoary bat (Lasiurus cinereus); and
- Birds: Yellow warbler (Setophaga petechia), and least Bell's vireo (Vireo bellii pusillus).

**Specific impact:** Project construction and related activities, directly or through indirect effects, may result in direct injury or mortality of SSC. The MND acknowledged the potential for these species to occur in and around the Project site.

Why impact would occur: Project implementation includes staging and using heavy equipment within and adjacent to the active river channel. These activities include increased ambient noise and vibration, night lighting, and other activities.

Anthropogenic noise can disrupt the communication of many wildlife species including frogs, birds, and bats (Sun and Narins 2005, Patricelli and Blickley 2006, Gillam and McCracken 2007, Slabbekoorn and Ripmeester 2008). Noise has also been shown to reduce the density of nesting birds (Francis et al. 2009) and cause increased stress that results in decreased immune responses (Kight and Swaddle 2011). Substantial noise may adversely affect wildlife species in several ways as wildlife responses to noise can occur at exposure levels of only 55-60 dB (Barber et al. 2009). For reference, normal conversation is approximately 60 dB, and natural ambient noise levels (e.g., forest habitat) are generally measured at less than 50dB.

Increased ambient lighting levels can increase predation risks and disorientation. This would disrupt normal behaviors of birds in adjacent feeding, breeding, and roosting habitat (Longcore and Rich 2004). Illumination of bat hibernation sites may cause avoidance as well as light disturbance within a hibernation site, which would cause bats to arouse from torpor (Stone et al. 2015). These effects may result in direct mortality, population declines, or local extirpation of SSC fish, reptile, and mammal species

**Evidence impact would be significant:** Project construction and activities, directly or through habitat modification, may result in direct mortality, reduced reproductive capacity, population declines, or local extirpation of SSC. CEQA provides protection not only for State and federally listed species, but for any species including but not limited to SSC which can be shown to meet the criteria for State listing. These SSC meet the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines, § 15065). Take of SSC could require a mandatory finding of significance by the City (CEQA Guidelines, § 15065).

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

**Mitigation Measure #1:** Pursuant to the California Code of Regulations, title 14, section 650, the County/qualified biologist must obtain appropriate handling permits to capture, temporarily possess, and relocate wildlife to avoid harm or mortality in connection with Project construction and activities. Please visit CDFW's <u>Scientific Collection Permits</u> webpage for information. A Lake and Streambed Alteration (LSA) Agreement may provide similar take or possession of species as described in the conditions of the agreement.

CDFW has the authority to issue permits for the take or possession of wildlife, including mammals; birds, nests, and eggs; reptiles, amphibians, fish, plants; and invertebrates (Fish &

Mr. Christopher Solis County of Ventura July 20, 2022 Page 8 of 25

Game Code, §§ 1002, 1002.5, 1003). Effective October 1, 2018, a Scientific Collecting Permit is required to monitor project impacts on wildlife resources, as required by environmental documents, permits, or other legal authorizations; and, to capture, temporarily possess, and relocate wildlife to avoid harm or mortality in connection with otherwise lawful activities (Cal. Code Regs., tit. 14, § 650).

**Mitigation Measure #2:** CDFW recommends monitoring noise generated by the Project operations during construction and post-construction operations to ensure noise from the Project does not affect wildlife in the surrounding river/riparian habitat. The MND should set acceptable noise thresholds that would be part of a daily monitoring and reporting program to ensure impact to adjacent habitat is below a threshold that would have an adverse effect.

**Mitigation Measure #3:** Construction equipment should use noise reduction features (e.g., mufflers and engine shrouds) that are no less effective than those originally installed by the manufacturer. Stationary noise sources (e.g., generators, pumps) at staging areas within 1,400 feet of sensitive receptors should be shielded at the source by an enclosure, temporary sound walls, or acoustic blankets. Where feasible, sound walls or acoustic blankets should have a height of no less than 8 feet, a Sound Transmission Class (STC) of 27 or greater, and a surface with a solid face from top to bottom without any openings or cutouts. Unnecessary construction vehicle use and idling time should be minimized to the extent feasible, such that if a vehicle is not required for use immediately or continuously for safe construction activities, its engine should be shut off.

**Mitigation Measure #4:** The County should retain a qualified biologist(s) with experience surveying for or is familiar with the life history of each of the species mentioned above. The qualified biologist should conduct focused surveys for SSC and suitable habitat within the appropriate season to detect presence, and again no more than one month from the start of any ground-disturbing activities or vegetation removal where there may be impacts to SSC. In addition, the qualified biologist should conduct daily biological monitoring during any activities involving vegetation clearing (including ruderal areas), open ditches or pits, or modification of natural habitat. Positive detections of SSC and suitable habitat at the detection location should be mapped and photographed and reported to the California Natural Diversity Database. The qualified biologist should provide a summary report of SSC surveys to the County prior to implementing any Project-related ground-disturbing activities and vegetation removal. Depending on the survey results, a qualified biologist should develop species-specific mitigation measures for implementation during the Project.

**Mitigation Measure #5:** Wildlife should be protected, allowed to move away on its own (non-invasive, passive relocation), or relocated to adjacent appropriate habitat on site or to suitable habitat adjacent to the project area. SSC should be captured only by a qualified biologist with proper handling permits. The qualified biologist should prepare a species-specific list (or plan) of proper handling and relocation protocols and a map of suitable and safe relocation areas. A relocation plan should be submitted to the County prior to implementing any Project-related ground- disturbing activities and vegetation removal.

**Mitigation Measure #6:** If any SSC are harmed during relocation or a dead or injured animal is found, work in the immediate area should stop immediately, the qualified biologist should be notified, and dead or injured wildlife documented. A formal report should be sent to CDFW and the County within three calendar days of the incident or finding. Work in the immediate area

Mr. Christopher Solis County of Ventura July 20, 2022 Page 9 of 25

may only resume once the proper notifications have been made and additional mitigation measures have been identified to prevent additional injury or death.

#### **Comment #4: Impacts to Sensitive Plant Communities**

**Issue:** The MND does not include a plant communities map sufficient to determine impacts to sensitive plant communities. Maps should be included for both the Bridge Road site and the Fairweather Driveway site.

**Specific impact:** To fully assess impacts to specific plant communities affected by the Project an appropriate plant communities map should be included within the MND. Plant community maps aid CDFW in determining the most appropriate avoidance and mitigation measures for specific Projects and activities.

Why impact would occur: CDFW appreciates the effort of the Applicant in correctly characterizing the surrounding plant communities. However, in order to reduce impacts and offer the most appropriate mitigation, it is necessary to know the specific plant communities that will be impacted by Project activities. Plant community alliances differ in ranking and rarity; thus mitigation measures and ratios may differ. Likewise, the MND should provide the total acreage of each alliance anticipated to be impacted by Project activities. The vegetation maps Figure 5A and 5B on pages 52 and 53 of the MND did not display the distribution of plant community alliances within the Project area. Vegetation communities were only referred to as "riparian vegetation," but should specify the location and distribution of each plant community present (e.g., Populus fremontii-Quercus agrifolia forest association; Salix laevigata woodland alliance, Salix exigua shrubland alliance; Baccharis salicifolia shrubland alliance; Salix lasiolepis shrubland alliance; Artemisia californica shrubland alliance; Quercus agrifolia woodland alliance; and Salvia mellifera shrubland alliance). Construction activities would include grading, excavation, vegetation removal, and vehicle movement which could result in direct and indirect impacts to sensitive plant communities.

**Evidence impact would be significant:** Impacts to special-status plant species should be considered significant under CEQA unless they are clearly mitigated below a level of significance. Inadequate avoidance, minimization, and mitigation measures for impacts to these sensitive plant species will result in a Project(s) continuing to have 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 U.S. Fish & Wildlife Service (USFWS). CDFW considers plant communities, alliances, and associations with a statewide ranking of S1, S2, S3, and S4 as sensitive and declining at the local and regional level (Sawyer et al. 2008). An S3 ranking indicates there are 21-80 occurrences of this community in existence in California, S2 has 6-20 occurrences, and S1 has less than 6 occurrences. The Project may have direct or indirect effects to these sensitive species. Mitigation measures and replacement ratios should be provided for ranked vegetation communities if present.

Take of CESA-listed rare plants may only be permitted through an ITP or other authorization issued by pursuant to California Code of Regulations, Title 14, section, 786.9 subdivision (b). CDFW is concerned the loss of CESA-listed rare plants may occur if appropriate avoidance, minimization, and/or mitigation for these species is not adopted.

Mr. Christopher Solis County of Ventura July 20, 2022 Page 10 of 25

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

Mitigation Measure #1: CDFW recommends the Project compose a plant communities map which displays the composition of sensitive plant communities surrounding the entirety of the Project site. To produce this map, vegetation surveys should be conducted following systematic field techniques outlined by CDFW's *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities* (CDFWb 2018). To determine the rarity ranking of vegetation communities on a specific Project site(s), CDFW utilizes vegetation descriptions found in the *Manual of California Vegetation* (MCV). The MCV alliance/association community names should be provided as CDFW only tracks rare natural communities using this classification system (found online at <a href="http://vegetation.cnps.org/">http://vegetation.cnps.org/</a>). CDFW recommends the environmental document provide measures to fully mitigate the loss of individual ESA- and CESA-listed plants and habitat.

- 1. The MND should provide a detailed map (1:24,000 or larger) showing which plants or populations will be impacted and provide a table that clearly documents the number of plants and acres of supporting habitat impacted, and plant composition (e.g., density, cover, abundance) within impacted habitat (e.g., species list separated by vegetation class; density, cover, abundance of each species).
- 2. The MND should provide species-specific measures for on-site mitigation. Each species-specific mitigation plan should adopt an ecosystem-based approach and be of sufficient detail and resolution to describe the following at a minimum: 1) identify the impact and level of impact (e.g., acres or individual plants/habitat impacted); 2) location of on-site mitigation and adequacy of the location(s) to serve as mitigation; 3) assessment of appropriate reference sites; 4) scientific [genus and species (subspecies/variety if applicable)] of plants being used for restoration; 5) location(s) of propagule source; 6) species-specific planting methods (i.e., container or seed); 7) measurable goals and success criteria for establishing self-sustaining populations (e.g., percent survival rate, absolute cover); 8) long-term monitoring, and; 9) adaptive management techniques.

Additionally, considerations should be made regarding timing of these field surveys to ensure accuracy in determining what plants exist on site. Adequate information about special status plants and natural communities present in a project area will enable reviewing agencies and the public to effectively assess potential impacts to special status plants or natural communities and will guide the development of minimization and mitigation measures (CDFWb 2018).

**Mitigation Measure #2:** If rare or sensitive plant communities are impacted on or near the footprint of the Project, CDFW recommends the MND provide measures to fully mitigate the loss of individual ESA- and CESA-listed plants and habitat. Rare plants are habitat specialists that require specific conditions to persist such as vegetation composition (species abundance, diversity, cover), soils, substrate, slope, hydrology, and pollinators. The Project proponent should mitigate at a ratio sufficient to achieve a no-net loss for impacts to special status plant species and their associated habitat. This should be for the number of plants replaced to number impacted, including acres of habitat created to acres of habitat impacted. CDFW recommends all impacts to S3 communities be mitigate at a minimum ratio of 5:1. Likewise, although the S4 ranking is defined as "apparently secure" these communities are of local importance and CDFW recommends they be mitigated at a minimum 3:1 ratio.

Mr. Christopher Solis County of Ventura July 20, 2022 Page 11 of 25

Mitigation Measure #3: All revegetation/restoration areas that will serve as mitigation should include preparation of a restoration plan (Plan), to be approved by CDFW prior to any ground disturbance. The restoration plan should include restoration and monitoring methods; annual success criteria; contingency actions should success criteria not be met; long-term management and maintenance goals; and a funding mechanism for long-term management. Areas proposed as mitigation should have a recorded conservation easement and be dedicated to an entity which has been approved to hold/manage lands (AB 1094; Government Code, §§ 65965-65968). The Plan should provide species-specific measures for on-site mitigation. Each speciesspecific mitigation plan should adopt an ecosystem-based approach and be of sufficient detail and resolution to describe the following at a minimum: 1) identify the impact and level of impact (e.g., acres or individual plants/habitat impacted); 2) location of onsite mitigation and adequacy of the location(s) to serve as mitigation; 3) assessment of appropriate reference sites; 4) scientific [Genus and species (subspecies/variety if applicable)] of plants being used for restoration; 5) location(s) of propagule source; 6) species-specific planting methods (i.e., container or seed); 7) measurable goals and success criteria for establishing self-sustaining populations (e.g. percent survival rate, absolute cover); 8) long-term monitoring, and; 9) adaptive management techniques.

**Mitigation Measure #4:** Success criteria should be based on the specific composition of the vegetation communities being impacted. Success should not be determined until the site has been irrigation-free for at least 5 years and the metrics for success have remained stable (no negative trend for richness/diversity/abundance/cover and no positive trend for invasive/non-native cover for each vegetation layer) for at least 5 years. In the revegetation plan, the success criteria should be compared against an appropriate reference site, with the same vegetation alliance, with as good or better-quality habitat. The success criteria should include percent cover (both basal and vegetative), species diversity, density, abundance, and any other measures of success deemed appropriate by CDFW. Success criteria should be separated into vegetative layers (tree, shrub, grass, and forb) for each alliance being mitigated, and each layer should be compared to the success criteria of the reference site, as well as the alliance criteria in the MCV ensuring one species or layer does not disproportionally dominate a site but conditions mimic the reference site and meets the alliance membership requirements.

CDFW does not recommend topsoil salvage or transplantation as viable mitigation options. Several studies have documented topsoil salvage had no effect on the recolonization of the target plant species (Hinshaw 1998). Based on the scientific literature available, relying on topsoil salvage alone to mitigate impacts to CEQA-rare plant species does not appear to provide any value to mitigate impacts to the plant.

**Recommendation #1:** CDFW recommends adhering to the vegetation descriptions found in the MCV to determine the rarity ranking of vegetation communities on a specific Project site(s). CDFW only tracks rare natural communities using this classification system. The natural communities provided on page 48 of the MND are not necessary for future projects due to the implementation of the MCV classification system in 2005.

Comment #4: Impacts to Non-Game Mammals and Wildlife

Mr. Christopher Solis County of Ventura July 20, 2022 Page 12 of 25

**Issue:** Wildlife may still move through the Project site during the daytime or nighttime. CDFW is concerned that any wildlife potentially moving through or seeking temporary refuge on the Project site may be directly impacted during Project activities and construction. Any final fence, or other design features, design should allow for wildlife movement.

**Specific impacts:** Project activities and construction equipment may directly impact wildlife and birds moving through or seeking temporary refuge on site. This could result in wildlife and bird mortality. Furthermore, depending on the final fencing design, the Project may cumulatively restrict wildlife movement opportunity.

Why impacts would occur: Direct impacts to wildlife may occur from: ground disturbing activities (e.g., staging, access, excavation, grading); wildlife being trapped or entangled in construction materials and erection of restrictive fencing; and wildlife could be trampled by heavy equipment operating in the Project site.

**Evidence impact would be significant:** Mammals occurring naturally in California are considered non-game mammals and are afforded protection by State law from take and/or harassment (Fish & Game Code, § 4150; Cal. Code of Regs, § 251.1).

**Recommended Potentially Feasible Mitigation Measure(s):** CDFW recommends the following four mitigation measures to avoid and minimize direct impacts to wildlife during Project construction and activities.

**Mitigation Measure #1:** If fencing is proposed for use during construction or during the life of the Project, fences should be constructed with materials that are not harmful to wildlife. Prohibited materials include, but are not limited to, spikes, glass, razor, or barbed wire. Fencing should also be minimized so as not to restrict free wildlife movement through habitat areas. Los Angeles County's Significant Ecological Areas Ordinance Implementation Guide (<a href="https://planning.lacounty.gov/site/sea/wp-content/uploads/2020/02/SEA-IG-2-6-20.pdf">https://planning.lacounty.gov/site/sea/wp-content/uploads/2020/02/SEA-IG-2-6-20.pdf</a>) offers additional information on permeable fencing as well as design standards. CDFW recommends reviewing those design standards.

**Mitigation Measure #2:** To avoid direct mortality, a qualified biological monitor should be on site prior to and during ground and habitat disturbing activities to move out of harm's way special status species or other wildlife of low mobility that would be injured or killed by grubbing or Project-related construction activities. Salvaged wildlife of low mobility should be removed and placed onto adjacent and suitable (i.e., species appropriate) habitat out of harm's way. It should be noted that the temporary relocation of on-site wildlife does not constitute effective mitigation for the purposes of offsetting Program impacts associated with habitat loss.

**Mitigation Measure #3:** Grubbing and grading should be done to avoid islands of habitat where wildlife may take refuge and later be killed by heavy equipment. Grubbing and grading should be done from the center of the Project site, working outward towards adjacent habitat off site where wildlife may safely escape.

#### **Additional Recommendations**

Mitigation and Monitoring Reporting Plan. Per Public Resources Code section 21081.6(a)(1), CDFW has provided the County with a summary of our suggested mitigation measures and

Mr. Christopher Solis County of Ventura July 20, 2022 Page 13 of 25

recommendations in the form of an attached Draft Mitigation and Monitoring Reporting Plan (MMRP; Attachment A). 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 by the County 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 and Game Code, § 711.4; Pub. Resources Code, § 21089).

#### Conclusion

We appreciate the opportunity to comment on the Project to assist the County in adequately analyzing and minimizing/mitigating impacts to 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)]. If you have any questions or comments regarding this letter, please contact Angela Castanon, Environmental Scientist, at Angela.Castanon@wildlife.ca.gov

Sincerely,

DocuSigned by:

Erinn Wilson-Olgin

Environmental Program Manager I

EC: CDFW

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State Clearinghouse - state.clearinghouse@opr.ca.gov

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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 (858) 467-4201 www.wildlife.ca.gov

GAVIN NEWSOM, Governor CHARLTON H. BONHAM, Director



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

CDFW recommends the following language to be incorporated into a future environmental document for the Project. A final MMRP should reflect results following additional plant and wildlife surveys and the Project's final on and/or off-site mitigation plans.

Biological Resources (BIO)				
Mi	tigation Measure (MM) or Recommendation (REC)	Timing	Responsible Party	
MM-BIO-1- LSA Agreement	CDFW concurs with the Project's statement to notify CDFW pursuant to Fish and Game Code, section 1600 <i>et seq.</i> The Project should notify prior to any Project construction or activities. Based on this notification and other information, CDFW determines whether a LSA with the applicant is required prior to conducting the proposed activities. Please visit the Lake and Streambed Alteration Program (https://wildlife.ca.gov/Conservation/Environmental-Review/LSA) webpage to obtain a notification package for an LSA.  CDFW's issuance of an LSA 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 section 1600 <i>et seq.</i> and/or under CEQA, the CEQA document should fully identify the potential impacts to the streams or riparian resources and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the LSA.	Prior to Project construction and activities	Ventura County/ Applicant	

Mr. Christopher Solis County of Ventura July 20, 2022 Page 16 of 25

MM-BIO-2- LSA Agreement	Any LSA Agreement issued for the Project by CDFW may include additional measures protective of streambeds on and downstream of the Project such as additional erosion and pollution control measures. To compensate for any on-site and off-site impacts to riparian resources, additional mitigation conditioned in any LSA Agreement may include the following: avoidance of resources, on-site or off-site creation, enhancement, or restoration, and/or protection and management of mitigation lands in perpetuity.	Prior to /During/ After Project construction and activities	Ventura County/ Applicant
MM-BIO-3- LSA Agreement	CDFW recommends fully avoiding impacts to waters and riparian/wetland vegetation communities. If feasible, CDFW recommends redesigning the Project to avoid impacts to the existing drainage features that support sensitive vegetation communities. Design alternatives should attempt to retain as much surface flow and natural hydrologic processes as possible. CDFW recommends taking an inter-disciplinary approach to involve landscape architects, engineers, and wildlife biologists, and hydrologists to develop design alternatives that could fully avoid or lessen impacts to waters and riparian/wetland vegetation communities.	Prior to Project construction and activities	Ventura County/ Applicant
MM-BIO-4- LSA Agreement	If impacts to streams are unavoidable, CDFW recommends that mitigation occur at a CDFW-approved bank. Mitigation bank credits should be purchased, approved, or otherwise fully executed prior to implementing Project-related ground-disturbing activities and prior to the County's issuance of grading permits.	Prior to Project construction and activities	Ventura County/ Applicant
MM-BIO-5- LSA Agreement	If credits at a CDFW-approved mitigation bank are not available, CDFW recommends setting aside replacement habitat to 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. Mitigation lands should be in the same watershed as the Project site and support in-kind vegetation. An appropriate non-wasting endowment should be provided for the long-term management of mitigation lands. A conservation easement and endowment funds should be fully acquired, established, transferred, or otherwise executed prior	Prior to Project construction and activities	Ventura County/ Applicant

Mr. Christopher Solis County of Ventura July 20, 2022 Page 17 of 25

	to implementing Project-related ground-disturbing activities prior to the County's issuance of grading permits.		
MM-BIO-6- LSA Agreement	If avoidance is not possible then sensitive plant communities ranked S3 ( <i>Populus fremontii-Quercus agrifolia</i> forest association & <i>Salix laevigata</i> woodland alliance) impacted by development or fuel modification should be mitigated at no less than 5:1. Sensitive plant communities ranked S4 ( <i>Salix exigua</i> shrubland alliance; <i>Baccharis salicifolia</i> shrubland alliance; and <i>Salix lasiolepis</i> shrubland alliance) be mitigated for at no less than 3:1. The Project proponent should mitigate at a ratio sufficient to achieve a no-net loss for impacts to special status plant species and their associated habitat. CDFW recommends that an on-site Habitat Mitigation and Monitoring Plan (HMMP) be developed. An HMMP should provide specific, detailed, and enforceable measures.	Prior to Project construction and activities	Ventura County/ Applicant
MM-BIO-7- LSA Agreement	CDFW recommends that all on-site mitigation sites for impacts to waters and riparian/wetland vegetation communities be protected in perpetuity from public encroachment and structural intrusion. This should include all water features on site, including ephemeral and perennial bodies.  CDFW recommends the Project fund a minimum of five years of initial restoration and maintenance. If applicable, mitigation lands (unnamed creeks, surrounding natural areas) should 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. An appropriate non-wasting endowment should be provided for the long-term management of mitigation lands. A conservation easement and endowment funds should be fully acquired, established, transferred, or otherwise executed prior to implementing Project-related ground-disturbing activities and prior to the County's issuance of grading permits.	Prior to/ During/After Project construction and activities	Ventura County/ Applicant

Mr. Christopher Solis County of Ventura July 20, 2022 Page 18 of 25

MM-BIO-8- Southern California Steelhead	The MND should analyze and discuss the Project's potential impact on Southern California steelhead population, habitat, substrate, and passage. The EIR should assess the potential impacts of habitat modification from Project activities, grading, removal of soil, and vegetation removal along stream banks. Additionally, the MND should assess the Project's effects on substrate composition within Santa Paula Creek. The MND should analyze the Project's effect on the hydrology and hydraulics (velocity, depth, and temperature) of Santa Paula Creek and how those effects may impact Southern California steelhead. An adequate analysis should provide the following information at a minimum:  1. Project effects on flow (cfs, acre-feet) and hydraulics (velocity, depth, dissolved oxygen, temperature, and wetted perimeter) during the wet season (November through March), dry season (April through October), and both above-average and below-average water year (i.e., wet season/above-average water year, dry season/above-average water year, and dry season/below-average water year) under pre-project (i.e., baseline conditions) and post-project conditions;  2. Percent changes in flow, velocity, depth, temperature, and wetted perimeter (acres gained/lost) under Project conditions;  3. Project effects on water quality (dissolved oxygen and turbidity) throughout the	Prior to Project construction and activities	Ventura County/ Applicant

Mr. Christopher Solis County of Ventura July 20, 2022 Page 19 of 25

	<ul> <li>4. Any Project-related temporal, partial, or total barriers that would impact fish passage for Southern California steelhead; and</li> <li>5. Any additional potential effects to on-going habitat recovery and restoration efforts for Southern California steelhead on a local or regional scale.</li> </ul>		
MM-BIO-9- Southern California Steelhead	If "take" or adverse impacts to CESA- listed species cannot be avoided either during Project construction and/or over the life of the Project, the County should consult with CDFW to determine if a CESA ITP is required (pursuant to Fish & Game Code, § 2080 et seq.).	Prior to Project construction and activities	Ventura County/ Applicant
MM-BIO-10- SSC	Pursuant to the California Code of Regulations, title 14, section 650, the County/qualified biologist must obtain appropriate handling permits to capture, temporarily possess, and relocate wildlife to avoid harm or mortality in connection with Project construction and activities. Please visit CDFW's Scientific Collection Permits webpage for information (CDFW 2020d). A Lake and Streambed Alteration (LSA) Agreement may provide similar take or possession of species as described in the conditions of the agreement.  CDFW has the authority to issue permits for the take or possession of wildlife, including mammals; birds, nests, and eggs; reptiles, amphibians, fish, plants; and invertebrates (Fish & G. Code, §§ 1002, 1002.5, 1003). Effective October 1, 2018, a Scientific Collecting Permit is required to monitor project impacts on wildlife resources, as required by environmental documents, permits, or other legal authorizations; and, to capture, temporarily possess, and relocate wildlife to avoid harm or mortality in connection with otherwise lawful activities (Cal. Code Regs., tit. 14, § 650).	Prior to construction and activities	Ventura County/ Applicant

Mr. Christopher Solis County of Ventura July 20, 2022 Page 20 of 25

	CDFW recommends monitoring noise generated by the Project operations during construction and post-construction operations to ensure noise from the Project does not affect wildlife in the surrounding river/riparian habitat. The MND should set acceptable noise thresholds that would be part of a daily monitoring and reporting program to ensure impact to adjacent habitat is below a threshold that would have an adverse effect.		
MM-BIO-11- SSC	Construction equipment should use noise reduction features (e.g., mufflers and engine shrouds) that are no less effective than those originally installed by the manufacturer. Stationary noise sources (e.g., generators, pumps) at staging areas within 1,400 feet of sensitive receptors should be shielded at the source by an enclosure, temporary sound walls, or acoustic blankets. Where feasible, sound walls or acoustic blankets should have a height of no less than 8 feet, a Sound Transmission Class (STC) of 27 or greater, and a surface with a solid face from top to bottom without any openings or cutouts. Unnecessary construction vehicle use and idling time should be minimized to the extent feasible, such that if a vehicle is not required for use immediately or continuously for safe construction activities, its engine should be shut off.	During construction and activities	Ventura County/ Applicant
MM-BIO-12- SSC	The County should retain a qualified biologist(s) with experience surveying for or is familiar with the life history of each of the species mentioned above. The qualified biologist should conduct focused surveys for SSC and suitable habitat within the appropriate season to detect presence, and again no more than one month from the start of any ground-disturbing activities or vegetation removal where there may be impacts to SSC. In addition, the qualified biologist should conduct daily biological monitoring during any activities involving vegetation clearing	Prior to/During construction and activities	Ventura County/ Applicant

Mr. Christopher Solis County of Ventura July 20, 2022 Page 21 of 25

	(including ruderal areas), open ditches or pits, or modification of natural habitat. Positive detections of SSC and suitable habitat at the detection location should be mapped and photographed and reported to the California Natural Diversity Database. The qualified biologist should provide a summary report of SSC surveys to the County prior to implementing any Project-related ground-disturbing activities and vegetation removal. Depending on the survey results, a qualified biologist should develop species-specific mitigation measures for implementation during the Project.		
MM-BIO-13- SSC	Wildlife should be protected, allowed to move away on its own (non- invasive, passive relocation), or relocated to adjacent appropriate habitat on site or to suitable habitat adjacent to the project area. SSC should be captured only by a qualified biologist with proper handling permits. The qualified biologist should prepare a species-specific list (or plan) of proper handling and relocation protocols and a map of suitable and safe relocation areas. A relocation plan should be submitted to the County prior to implementing any Project-related ground- disturbing activities and vegetation removal.	During construction and activities	Ventura County/ Applicant
MM-BIO-14- SSC	If any SSC are harmed during relocation or a dead or injured animal is found, work in the immediate area should stop immediately, the qualified biologist should be notified, and dead or injured wildlife documented. A formal report should be sent to CDFW and the County within three calendar days of the incident or finding. Work in the immediate area may only resume once the proper notifications have been made and additional mitigation measures have been identified to prevent additional injury or death.	During construction and activities	Ventura County/ Applicant
MM-BIO-15- Sensitive Plant Communities	CDFW recommends resurveying the project footprint and fuel modification area to produce a revised plant communities map. Vegetation surveys should be conducted following systematic field techniques outlined by CDFW's <i>Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and</i>	Prior to Project construction and activities	Ventura County/ Applicant

Mr. Christopher Solis County of Ventura July 20, 2022 Page 22 of 25

Sensitive Natural Communities (CDFWa 2018). To determine the rarity ranking of vegetation communities on a specific Project site(s), CDFW utilizes vegetation descriptions found in the MCV. The MCV alliance/association community names should be provided as CDFW only tracks rare natural communities using this classification system (found online at <a href="http://vegetation.cnps.org/">http://vegetation.cnps.org/</a>). CDFW recommends the environmental document provide measures to fully mitigate the loss of individual ESA- and CESA-listed plants and habitat.

- 1. The MND should provide a map showing which plants or populations will be impacted and provide a table that clearly documents the number of plants and acres of supporting habitat impacted, and plant composition (e.g., density, cover, abundance) within impacted habitat (e.g., species list separated by vegetation class; density, cover, abundance of each species).
- 2. The MND should provide species-specific measures for onsite mitigation. Each species-specific mitigation plan should adopt an ecosystem-based approach and be of sufficient detail and resolution to describe the following at a minimum: 1) identify the impact and level of impact (e.g., acres or individual plants/habitat impacted); 2) location of onsite mitigation and adequacy of the location(s) to serve as mitigation; 3) assessment of appropriate reference sites; 4) scientific [genus and species (subspecies/variety if applicable)] of plants being used for restoration; 5) location(s) of propagule source; 6) species-specific planting methods (i.e., container or seed); 7) measurable goals and success criteria for establishing self-sustaining populations (e.g., percent survival rate, absolute cover); 8) long-term monitoring, and; 9) adaptive management techniques.

Mr. Christopher Solis County of Ventura July 20, 2022 Page 23 of 25

MM-BIO-16- Sensitive Plant Communities	If rare or sensitive plant communities are impacted on or near the footprint of the Project, CDFW recommends the MND provide measures to fully mitigate the loss of individual ESA- and CESA-listed plants and habitat. The Project proponent should mitigate at a ratio sufficient to achieve a no-net loss for impacts to special status plant species and their associated habitat. This should be for the number of plants replaced to number impacted, including acres of habitat created to acres of habitat impacted. CDFW recommends all impacts to S3 communities be mitigate at a minimum 5:1 ratio. Likewise, although the S4 ranking is defined as "apparently secure" these communities are of local importance and CDFW recommends they be mitigate at a minimum 3:1 ratio. Rare plants are habitat specialists that require specific conditions to persist such as vegetation composition (species abundance, diversity, cover), soils, substrate, slope, hydrology, and pollinators.	Prior to Project construction and activities	Ventura County/ Applicant
MM-BIO-17- Sensitive Plant Communities	CDFW recommends fully avoiding impacts to waters and riparian/wetland vegetation communities. If feasible, CDFW recommends redesigning the Project to avoid impacts to the existing drainage features that support sensitive vegetation communities. Design alternatives should attempt to retain as much surface flow and natural hydrologic processes as possible. CDFW recommends taking an inter-disciplinary approach to involve landscape architects, engineers, and wildlife biologists, and hydrologists to develop design alternatives that could fully avoid or lessen impacts to waters and riparian/wetland vegetation communities.	Prior to Project construction and activities	Ventura County/ Applicant
MM-BIO-18- Sensitive Plant Communities	Success criteria should be based on the specific composition of the vegetation communities being impacted. Success should not be determined until the site has been irrigation-free for at least 5 years and the metrics for success have remained stable (no negative trend for richness/diversity/abundance/cover and no positive trend for invasive/non-native cover for each vegetation layer) for at least 5 years. In the revegetation plan, the success criteria should be compared against an appropriate reference site,	Prior to Project construction and activities	Ventura County/ Applicant

Mr. Christopher Solis County of Ventura July 20, 2022 Page 24 of 25

	with the same vegetation alliance, with as good or better-quality habitat. The success criteria should include percent cover (both basal and vegetative), species diversity, density, abundance, and any other measures of success deemed appropriate by CDFW. Success criteria should be separated into vegetative layers (tree, shrub, grass, and forb) for each alliance being mitigated, and each layer should be compared to the success criteria of the reference site, as well as the alliance criteria in MCV ensuring one species or layer does not disproportionally dominate a site but conditions mimic the reference site and meets the alliance membership requirements.  CDFW does not recommend topsoil salvage or transplantation as viable mitigation options. Several studies have documented topsoil salvage had no effect on the recolonization of the target plant species (Hinshaw 1998). Based on the scientific literature available, relying on topsoil salvage alone to mitigate impacts to CEQA-rare plant species does not appear to provide any value to mitigate impacts to the plant.		
MM-BIO-19- Impacts to Non- Game Mammals and Wildlife	If fencing is proposed for use during construction or during the life of the Project, fences should be constructed with materials that are not harmful to wildlife. Prohibited materials include, but are not limited to, spikes, glass, razor, or barbed wire. Fencing should also be minimized so as not to restrict free wildlife movement through habitat areas. Los Angeles County's Significant Ecological Areas Ordinance Implementation Guide ( <a href="https://planning.lacounty.gov/site/sea/wp-content/uploads/2020/02/SEA-IG-2-6-20.pdf">https://planning.lacounty.gov/site/sea/wp-content/uploads/2020/02/SEA-IG-2-6-20.pdf</a> ) offers additional information on permeable fencing as well as design standards. CDFW recommends reviewing those design standards.	Prior to/During Project construction and activities	Ventura County/ Applicant
MM-BIO-20- Impacts to Non- Game Mammals and Wildlife	To avoid direct mortality, a qualified biological monitor should be on site prior to and during ground and habitat disturbing activities to move out of harm's way special status species or other wildlife of low mobility that would be injured or killed by grubbing or	During Project construction and activities	Ventura County/ Applicant

Mr. Christopher Solis County of Ventura July 20, 2022 Page 25 of 25

	Project-related construction activities. Salvaged wildlife of low mobility should be removed and placed onto adjacent and suitable (i.e., species appropriate) habitat out of harm's way.  It should be noted that the temporary relocation of on-site wildlife does not constitute effective mitigation for the purposes of offsetting Program impacts associated with habitat loss.		
MM-BIO-21- Impacts to Non- Game Mammals and Wildlife	Grubbing and grading should be done to avoid islands of habitat where wildlife may take refuge and later be killed by heavy equipment. Grubbing and grading should be done from the center of the Project site, working outward towards adjacent habitat off site where wildlife may safely escape.	Prior to/During construction and activities	Ventura County/ Applicant
REC-1- LSA	The Project should be conditioned to fully avoid all impacts to steelhead. CDFW concurs CDFW agrees that no work should occur in the stream channel or stream banks during the winter rainy season. However, within the MND it states that construction will be limited between June 15 and October 15, CDFW recommends this be changed to September 15-October 15 to avoid the nesting bird season.	Prior to construction and activities	Ventura County/ Applicant
REC-2- MCV Classification	CDFW recommends adhering to the vegetation descriptions found in the MCV to determine the rarity ranking of vegetation communities on a specific Project site(s). CDFW only tracks rare natural communities using this classification system. The natural communities provided on page 48 of the MND are not necessary for future projects due to the implementation of the MCV classification system in 2005.	Prior to construction and activities	Ventura County/ Applicant
REC-3- Mitigation and Monitoring	Per Public Resources Code section 21081.6(a)(1), CDFW has provided the County with a summary of our suggested mitigation measures and recommendations in the form of an attached Draft Mitigation and Monitoring Reporting Plan (MMRP; Attachment A). A final MMRP should reflect results following additional plant and wildlife surveys and the Project's final on and/or off-site mitigation plans.	Prior to construction and activities	Ventura County/ Applicant

Letter 1 Commenter: Erinn Wilson-Olgin, Environmental Program Manager, CDFW

**Date**: July 20, 2022

The following contains responses to comments and recommendations made by the California Department of Fish and Wildlife (CDFW) during the public circulation of the draft Initial Study/Mitigated Negative Declaration (IS/MND).

# Response to Comment 1: Impacts to Aquatic and Riparian Resources, Lake and Streambed Alteration Agreement (LSA)

Section 5 of the MND identifies impacts on Santa Paula Creek and associated riparian and wetland vegetation. The discussion includes impacts on the creek and associated vegetation communities, as well as impacts on special-status plants and wildlife species, including the Southern California steelhead, arroyo chub, and California red-legged frog.

Section 5 of the MND includes mitigation for temporary impacts on riparian habitat through on-site revegetation at a minimum ratio of 1:1 or through the removal of invasive species. No permanent impacts are anticipated to result from the project; therefore, the need for off-site mitigation is not anticipated. On-site revegetation would include replacement of existing vegetation communities at a minimum ratio of 1:1. The revegetation would be expected to achieve no net loss of existing habitats; therefore, the project would not be expected to result in substantial impacts on sensitive plant communities.

Section 5 of the MND identifies that the project would result in temporary impacts on approximately 0.154 acre of streambed. A water diversion would be required but would result in only minimal changes to the flow pattern in the creek, and the construction period would be limited to four months. The affected areas of the creek would be re-contoured following construction to match existing conditions, and the project would not result in any permanent changes to stream flow.

The County plans to notify the CDFW regarding the project prior to any project construction or activities. The County will provide the CDFW with the Final CEQA document for CDFW's consideration. The County will make all efforts to ensure the CEQA document fully assesses potential project impacts and provides adequate measures to reduce these impacts. If a Streambed Alteration Agreement is issued, the County will comply with all measures included in the approved agreement. The County will make all efforts to include adequate measures in the notification package and will coordinate with the CDFW regarding additional requirements.

Because the project would require bank stabilization, it is not feasible to fully avoid impacts on the creek and riparian/wetland communities; however, impact areas have been minimized to the extent feasible based on technical studies and coordination between the project biologists and the engineering team. In addition measures are included in Section 5 of the MND to avoid impacts on natural resources outside of the construction footprint.

No permanent impacts are anticipated to result from the project; therefore, the need for off-site mitigation through CDFW-approved credits or conservation easement is not anticipated. An HMMP would be prepared during final design to support the regulatory permitting process. The HMMP would include details on the proposed mitigation plan, including the area to be planted, number and type of species,

and maintenance and monitoring plans. The success criteria for the revegetation would be expected to achieve no net loss of existing habitats.

The project area includes a segment of Santa Paula Creek that is not currently used for public recreation and is surrounded by private agricultural parcels. There are no plans to construct any new facilities within the creek; however, future maintenance of the bridge and roadway facilities may be required. On-site revegetation would be maintained and monitored for three to five years, or until success criteria is achieved. This is a typical time period for restoration projects.

Because the project would require water diversion and temporary impacts on the creek, potential impacts on Southern California steelhead cannot be fully avoided. Measures have been included in Section 5 of the MND to avoid and minimize impacts to the extent feasible, including the construction window. Because construction would require four months, it's not feasible to limit the work to September 15-October 15. However, measures are included in Chapter 4 of the MND to avoid and minimize the potential for impacts on nesting birds.

### Response to Comment 2: Impacts to Southern California Steelhead (Oncorhychus mykiss)

Section 5 of the MND identifies the presences of Southern California steelhead in the project area, and potential impacts that may result from construction. The MND has been revised to include the recent listing of this species as a candidate species under CSEA. If the Commission determines that the listing of this species is warranted, consultation with the CDFW will be conducted prior to construction, and an ITP will be requested if applicable.

A water diversion would be required during construction but would result in only minimal changes to the flow pattern in the creek, and the construction period would be limited to four months during the low flow period. The affected areas of the creek would be re-contoured following construction to match existing conditions, and the project would not result in any permanent changes to stream flow, hydraulics, or water quality compared to existing conditions.

The temporary diversion would re-direct existing flows through a culvert but would not present a barrier to fish passage. In addition, measures are included in Chapter 4 of the MND to reduce the potential for impacts on fish, including limited construction windows, monitoring, and relocation. The project would not be expected to result in any permanent barriers to fish passage in the project area. The project area would be restored to match existing conditions following construction and would not be expected to have any additional impacts on habitat recovery and restoration efforts for Southern California steelhead.

If the Commission determines that the listing of this species is warranted, consultation with the CDFW will be conducted prior to construction, and an ITP will be requested if applicable.

#### Response to Comment 3: Impacts to California Species of Special Concern

Standard measures would be implemented to reduce noise levels generated by equipment to the extent feasible. In addition, a measure has been added to Chapter 13 of the MND to require that construction equipment be equipped with noise reduction features and that unnecessary construction vehicle use and idling time should be minimized to the extent feasible.

Project biologists will be qualified for assigned tasks. The project area was surveyed during multiple years/seasons for suitable habitat and presence of species during project level surveys; no special-status

species were observed. Additional seasonal and pre-construction surveys are included in Section 5 of the MND. If special-status species are observed, they will be reported to the CNDDB. In addition, a measure has been added to Chapter 4 of the MND to include biological monitoring and reporting during vegetation clearing, grading, and modification of natural habitats.

If wildlife relocation is warranted during construction activities, project biologists will hold or obtain the required permits for this work. In addition, a measure has been added to Chapter 4 of the MND that if wildlife is detected during construction, it would be allowed to move away on its own or relocated to suitable habitat. A measure has also been added that a species-specific plan would be prepared identifying methods for proper handling and relocation protocols.

#### Response to Comment 4: Impacts to Sensitive Plant Communities

Maps included in Section 5 of the MND have been revised to include the locations of the individual vegetation communities within the project area. This information has been included for the entire study area, including the Bridge Road site and the Fairweather Driveway site. The MND has been revised to include the acreage of temporary impacts for individual vegetation communities within the project area. No permanent impacts are anticipated.

Section 5 of the MND includes measures to avoid, minimize, and mitigate for impacts on special-status plants if present. No CESA-listed plant species were identified as having potential to be in the BSA. Section 5 of the MND includes mitigation for temporary impacts on riparian habitat through on-site revegetation at a minimum ratio of 1:1 or through the removal of invasive species. No permanent impacts are anticipated to result from the project; therefore, the need for off-site mitigation is not anticipated. Onsite revegetation would include replacement of existing vegetation communities at a minimum ratio of 1:1. The success criteria for the revegetation would be expected to achieve no net loss of existing habitats.

An HMMP would be prepared during final design to support the regulatory permitting process. The HMMP would include details on the proposed mitigation plan, including the area to be planted, number and type of species, and maintenance and monitoring plans. Details methods would be developed as part of the HMMP during final design and would be coordinated with the CDFW as part of the regulatory permitting process.

No special-status plants were observed during previous project level surveys. Chapter 4 of the MND includes a measure stating that subsequent plant surveys would be conducted during the appropriate bloom window for the plants with potential to be in the project area.

Section 5 of the MND includes measures to avoid, minimize, and mitigate for impacts on special-status plants if present. No CESA- or FESA-listed plant species were identified as having potential to be in the BSA. No special-status plants were observed during previous project level surveys. Chapter 4 of the MND includes a measure stating that subsequent plant surveys would be conducted during the appropriate bloom window for the plants with potential to be in the project area.

Success criteria used for the on-site mitigation would be based on baseline conditions identified during project levels surveys, and a reference site would be used. Details on success criteria would be developed as part of the HMMP during final design and would be coordinated with the CDFW as part of the regulatory permitting process.

The vegetation communities for the project were described using the California Manual of Vegetation. A crosswalk between the Manual of California classifications and Holland classifications was provided because the special-status communities are named using the Holland classification system. Because this crosswalk is provided in Table 7 of the MND, the text section describing each of the special-status communities has been removed.

#### Response to Comment 5: Impacts to Non-Game Mammals and Wildlife

Section 5 of the MND identifies impacts on wildlife species, including birds and bats, from construction activities and provides measures to avoid and minimize these impacts. Temporary ESA fencing would be installed to protect special-status plants, vegetation communities, and aquatic resources outside of the construction footprint. In addition, exclusionary fencing would be installed to prevent access to the construction site for reptiles. Installation and maintenance of the fencing would be fencing would be designed and installed in a way that prevents impacts on wildlife. There are no plans to install any permanent fencing as part of the project; therefore, permanent impacts on wildlife movement are not anticipated.

A measure has been added to conduct pre-construction surveys for all wildlife. In addition, measures have been added to Chapter 4 of the MND for biological monitoring and reporting during vegetation clearing, grading, and modification of natural habitats; allowing wildlife to move away on its own or relocating it to suitable habitat; and preparing a plan identifying methods for proper handling and relocation protocols.

If any low-mobility wildlife individuals are observed within the construction area, a qualified biologist would capture and relocate them to suitable habitat at least 100 feet outside of the construction area. This relocation would not be considered as part of the mitigation for habitat removal. In addition, measures have been added to Chapter 4 of the MND for biological monitoring and reporting during vegetation clearing, grading, and modification of natural habitats; allowing wildlife to move away on its own or relocating it to suitable habitat; and preparing a plan identifying methods for proper handling and relocation protocols.

A measure has been added to Section 5 of the MND to require that all clearing and grubbing would be conducted in a systematic manner that avoids habitat islands. In addition, measures have been added that prior to vegetation removal, a biologist would survey the vegetation for wildlife, and activities would be monitored by a qualified biologist to ensure wildlife is not harmed.

The comments and recommendations have been reviewed, and additional text and measures have been added to the IS/MND where warranted.

July 14, 2022

## **VIA EMAIL**

Mr. Christopher Solis County of Ventura 800 S Victoria Ave Ventura, CA 93009 christopher.solis@ventura.org **Governor's Office of Planning & Research** 

Jul 27 2022

### **STATE CLEARINGHOUSE**

Dear Mr. Solis:

BRIDGE ROAD BRIDGE REHABILITATION AND SCOUR MITIGATION PROJECT, MND - Mitigated Negative Declaration, STATE CLEARNINGHOUSE NO. 2022060410

The California Geologic Energy Management Division (CalGEM) has received and reviewed the above referenced project received June 20, 2022. CalGEM provides the following comments regarding the Bridge Road Bridge Rehabilitation and Scour Mitigation Project.

- 1. With the mission of safeguarding public health and protecting the environment, CalGEM administers regulations and procedures pertaining to all oil and gas wells on California public and private land and offshore. Operators must obtain CalGEM approval and permits for a variety of activities, including drilling, reworking, and plugging and abandoning oil wells. Wells must be constructed and maintained in accordance with CalGEM regulations. No well work may be performed on any oil, gas, or geothermal well without written approval from CalGEM. This includes, but is not limited to, mitigating leaking gas or other fluids from abandoned wells, modifications to well casings, and/or any reabandonment work.
- 2. There are two plugged and abandoned oil wells within the immediate of vicinity the project's environmental study limits:

### State of California Natural Resources Agency | Department of Conservation

Northern District

API	0411106074
Lease	Schuyler
Well Number	1
Туре	Dry Hole
Status	Plugged & Abandoned
Operator	Community Oil Producers

API	0411106078
Lease	Powell
Well Number	1
Туре	Dry Hole
Status	Plugged & Abandoned
Operator	Phillips Oil Company

Neither wells are expected to be directly impacted by the project, however care should be taken in case these wells or other unknown wells are encountered. Please visit CalGEM's website to view oil and gas well locations at <a href="https://maps.conservation.ca.gov/doggr/wellfinder">https://maps.conservation.ca.gov/doggr/wellfinder</a>

3. Prior to development activities near oil and gas wells, please contact CalGEM for a review and recommendations. Public Resources Code (PRC) section 3208.1 establishes well re-abandonment responsibility when a previously plugged and abandoned well 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 oil, gas, and geothermal wells.

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. Maintaining sufficient access is considered the ability for a well servicing unit and associated necessary equipment 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.

There are no guarantees a well abandoned in compliance with current CalGEM requirements as prescribed by law will not start leaking in the future. Any well may start to leak oil, gas, and/or water after abandonment, no matter how

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thoroughly the well was plugged and abandoned. CalGEM acknowledges that wells plugged and abandoned to the most current CalGEM requirements, as prescribed by law, have a lower probability of leaking in the future. However, there is no guarantee that such abandonments will not leak.

PRC section 3208.1 gives CalGEM the authority to order and/or permit the reabandonment of any well where there is reason to question the integrity of the previous abandonment, or if the well is not accessible or visible. 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:

- a) The property owner If the well was plugged and abandoned in conformance with CalGEM requirements at the time of plugging and abandonment, and 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 reabandonment.
- b) The person or entity causing construction over or near the well If the well was plugged and abandoned in conformance with CalGEM 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 the construction, 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.
- c) The party or parties responsible for disturbing the integrity of the abandonment If the well was plugged and abandoned in conformance with CalGEM 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 reabandonment.

No well work may be performed on any oil, gas, or geothermal well without written approval from CalGEM. Well work requiring written approval includes, but is not limited to, mitigating leaking gas or other fluids from abandoned wells, modifications to well casings, and/or any other abandonment or re-abandonment work. CalGEM also regulates the top of a plugged and abandoned well's minimum and maximum depth

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below final grade. California Code of Regulations (CCR) section 1723.5 states well casings shall be cut off at least 5 feet but no more than 10 feet below grade. 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.

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

- a) 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 above 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.
- b) 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 jurisdictional 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.

Thank you for considering CalGEM's comments. If you have any questions, please contact the Northern District office at (805) 937-7246 or via email at <a href="mailto:CalGEMNorthern@conservation.ca.gov">CalGEMNorthern@conservation.ca.gov</a>

Sincerely,

Miguel Cabrera

Miguel Cabrera Northern District Deputy

BF:bw:ks

cc: Chrono/CEQA/CEQA HQ/STATE CLEARINGHOUSE/OLRA/Jan Perez

Page 4 of 4

Letter 2: Commenter: Miguel Cabrera, Northern District Deputy, CalGEM

**Date**: July 14, 2022

Date received by OPR: July 27, 2022

Response A: The commenter stated that CalGEM administers regulations and procedures pertaining to all oil and gas wells on California public and private land and offshore, with the mission of safeguarding public health and protecting the environment. The commenter recommended that no well work may be performed on any oil, gas, or geothermal well without written approval from CalGEM, stating that operators must obtain CalGEM approval and permits for a variety of activities. Prior to approval of final plans, a geotechnical study would be completed by an engineering geologist or equivalent to evaluate soil conditions and confirm the absence of oil and gas wells within the project site. Additionally, mitigation measure GEO-4 has been added to the *Geology/Soils* Section of the MND in response to this comment, which states that no well work would be performed on any oil or gas well without written approval from CalGEM in the form of an appropriate permit.

**Response B:** The commenter noted the presence of two plugged and abandoned oil wells within the immediate vicinity of the project's environmental study limits. A discussion of the two plugged and abandoned oil wells has been added to the *Geology/Soils* Section of the MND, along with mitigation measures GEO-3 through GEO-6 in the case these wells or other unknown wells are encountered. Neither wells are expected to be directly impacted by the project, and fall outside of the project's direct footprint and the project's defined environmental study limits.

Response C: The commenter recommended contacting CalGEM for a review and recommendation prior to development activities near oil and gas wells. The project is not expected to impact impact oil and gas wells, and no work would be performed on any oil or gas well without written approval from CalGEM. The commenter noted that CalGEM categorically advises against building over, or in any way impeding access to oil, gas, or geothermal wells. The project is not expected to build over, or impede access to oil, gas, or geothermal wells. Mitigation measure GEO-5 has been added to the *Geology/Soils* Section of the MND to ensure that access to any well located on the property would be maintained in the event abandonment or re-abandonment of the well becomes necessary in the future. The commenter additionally notes that there is no guarantee a well abandoned in compliance with current CalGEM requirements as prescribed by law will not start leaking in the future, and stated that responsibility for re-abandonment costs may be affected by the choices made by the local permitting agency, property owner, and/or developer. This comment has been noted.

**Response D:** The commenter restates that no well work may be performed on any oil, gas, or geothermal well without written approval from CalGEM. As discussed in response A above, mitigation measure GEO-4 ensures that no well work would be performed on any oil, gas, or geothermal well without written approval from CalGEM.

**Response E:** The commenter recommended that present and future property owners are aware of the existence of all wells located on the property, and the potentially significant issues associated with any improvements near oil and gas wells. Mitigation measure GEO-5 has been added to ensure that information regarding the identified wells and any other pertinent information obtained would be

communicated to the appropriate county recorder for inclusion in the title information of the subject real property.

**Response F:** The commenter recommended that any soil containing hydrocarbons be disposed of in accordance with applicable laws, and that notice be given to appropriate authorities if soil containing significant amounts of hydrocarbons are discovered. Mitigation measure GEO-6 has been added to ensure that any soil containing significant amounts of hydrocarbons would be disposed of in accordance with local, state, and federal laws. Appropriate authorities would be notified if soil containing significant amounts of hydrocarbons is discovered during development.

## VII. Mitigation Monitoring or Reporting Plan (MMRP)

# Bridge Road Bridge (Br. No. 52C-0053) Rehabilitation and Scour Mitigation Project

## California Environmental Quality Act Mitigation Monitoring and Reporting Program

State Clearinghouse #2022060410

Prepared for:

County of Ventura

Department of Public Works

800 South Victoria Avenue, Ventura, CA 93009

Contact: Christopher Solis, Engineering Manager

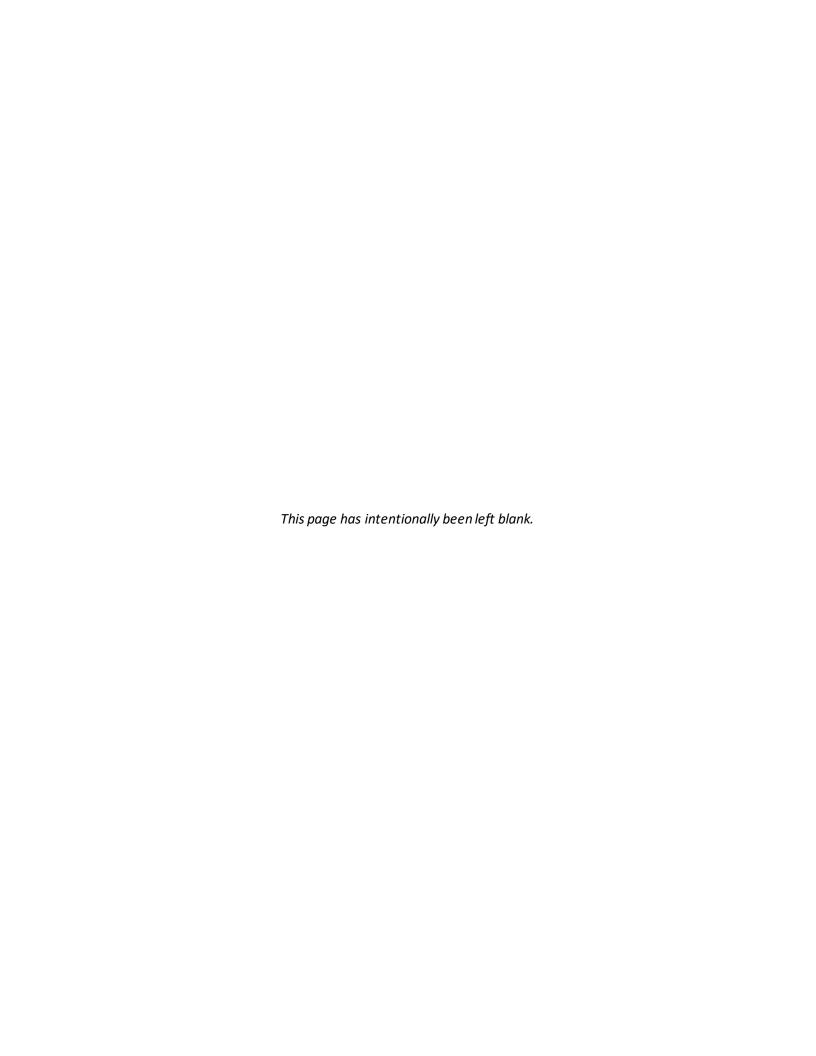
Prepared by:

**GPA Consulting** 

840 Apollo Street, Suite 312 El Segundo, CA 90245

Contact: Catherine Saint, Senior Environmental Planner

August 2022



## **Mitigation Monitoring and Reporting Program**

CEQA requires that a reporting or monitoring program be adopted for the conditions of project approval that are necessary to mitigate or avoid significant effects on the environment (Public Resources Code 21081.6). The mitigation monitoring and reporting program is designed to ensure compliance with adopted mitigation measures during project implementation.

For each mitigation measure recommended in the Mitigated Negative Declaration (MND), specifications are made herein that identify the action required and the monitoring that must occur. In addition, a responsible agency is identified for verifying compliance with individual conditions of approval contained in the Mitigation Monitoring and Reporting Program (MMRP).

To implement this MMRP, the County of Ventura will designate a Project Mitigation Monitoring and Reporting Coordinator (Coordinator). The Coordinator will be responsible for ensuring that the mitigation measures incorporated into the project are complied with during project implementation.

The following table will be used as the Coordinator's checklist to determine compliance with required mitigation measures.

Table 1. Mitigation Monitoring and Reporting Program

	ACTION REQUIRED	TIMING/PHASE	MONITORING FREQUENCY	RESPONSIBLE AGENCY OR PARTY	COMPLIANCE VERIFICATION		
AVOIDANCE, MINIMIZATION, AND MITIGATION MEASURES					INITIAL	DATE	COMMENTS
Air Quality							
<b>AQ-1</b> : VCAPD rule-55; Nuisance, Rule 51; Rule 52 Particulate Matter Concentration, would be applied during project construction to minimize air quality pollutants as a result of construction activity.	VCAPD rule-55, Rule 51, and Rule 52 are to be applied during construction.	Final Design Construction	During Plan Check Continuous	Ventura Public Works			
AQ-2: The construction contractor would comply with the Caltrans' standard Specifications in Section 14-9 (2018). Section 14-9-02 specifically requires compliance by the contractor with all applicable laws and regulations related to air quality, including air pollution control district and air quality management district regulations and local ordinances.	Caltrans' Standard Specification Section 14-9.02 is to be applied during construction.	Final Design Construction	During Plan Check Continuous	Ventura Public Works			
AQ-3: Pre-grading/excavation activities would include watering the area to be graded or excavated before commencement of grading or excavation operations. Application of water (preferably reclaimed, if available) should penetrate sufficiently to minimize fugitive dust during grading activities.	Water is to be applied prior to grading/excavation activities to minimize fugitive dust during grading activities.	Construction	Continuous	Ventura Public Works			
<ul> <li>AQ-4: Fugitive dust produced during grading, excavation, and construction activities would be controlled by the following activities:         <ul> <li>All trucks should be required to cover their loads as required by California Vehicle Code §23114</li> <li>All graded and excavated material, exposed soil areas, and active portions of the construction site, including unpaved on-site roadways, should be treated to prevent fugitive dust. Treatment should include, but not necessarily be limited to, periodic watering, application, of environmentally-safe soil stabilization materials, and/or roll-compaction as appropriate. Watering should be done as often as necessary and reclaimed water should be</li> </ul> </li> </ul>	During construction, fugitive dust would be controlled by California Vehicle Code §23114, and by periodic watering on unpaved on-site roadways.	Final Design Construction	During Plan Check Continuous	Ventura Public Works			

			Monitoring	RESPONSIBLE	COMPLIANCE VERIFICATION		
AVOIDANCE, MINIMIZATION, AND MITIGATION MEASURES	ACTION REQUIRED	TIMING/PHASE	FREQUENCY	AGENCY OR PARTY	INITIAL	DATE	COMMENTS
used whenever possible.							
AQ-5: Graded and/or excavated inactive areas of the construction site would be monitored by the environmental monitor at least weekly for dust stabilization. Soil stabilization methods, such as water and roll-compaction, and environmentallysafe dust control materials, would be periodically applied to portions of the construction site that are inactive for over four days. If no further grading or excavation operations are planned for the area, the area would be seeded and watered until grass growth is evident, or periodically treated with environmentally-safe dust suppressants, to prevent excessive fugitive dust.	Soil stabilization methods are to be periodically applied to portions of the construction site that are inactive for over four days. Areas of construction that are excavated or graded are to be monitored weekly by the environmental monitor for dust stabilization. Areas where no further grading or excavation operations are planned are to be treated to prevent excessive fugitive dust.	Final Design Construction	During Plan Check Continuous	Ventura Public Works			
<b>AQ-6:</b> Signs would be posted on-site limiting traffic to 15 miles per hour or less.	Construction traffic is to be limited to 15 miles per hour during construction hours.	Final Design Construction	During Plan Check Continuous	Ventura Public Works			
AQ-7: During periods of high winds (i.e., wind speed sufficient to cause fugitive dust to impact adjacent properties), all clearing, grading, earth moving, and excavation operations would be curtailed to the degree necessary to prevent fugitive dust created by on-site activities and operations from being a nuisance or hazard, either off-site or on-site. The site superintendent/supervisor should use his/her discretion in conjunction with VCAPD in determining when winds are excessive.	All construction activities are to be curtailed to the degree necessary to prevent fugitive dust created by on-site activities and operations from being a nuisance or hazard.	Final Design Construction	During Plan Check Continuous	Ventura Public Works			
<b>AQ-8:</b> Adjacent streets and roads would be swept at least once per day, preferably at the end of the day,	On construction days, adjacent streets and	Final Design Construction	During Plan Check	Ventura Public Works			

			Monitoring	RESPONSIBLE	COMPLIANCE VERIFICATION		
AVOIDANCE, MINIMIZATION, AND MITIGATION MEASURES	ACTION REQUIRED	TIMING/PHASE	FREQUENCY	AGENCY OR PARTY	INITIAL	DATE	COMMENTS
if visible soil material is carried over to adjacent streets and roads.	roads are to be swept at least once per day, if visible soil materials are carried over to adjacent streets and roads.		Once per day				
AQ-9: Personnel involved in grading operations, including contractors and subcontractors, would be advised to wear respiratory protection in accordance with California Division of Occupational Safety and Health regulations.	All personnel involved in grading operations, including contractors and subcontractors are to be advised to wear respiratory protection in accordance with California Division of Occupational Safety and Health regulations.	Construction	Continuous	Ventura Public Works			
Biological Resources							
<b>BIO-1:</b> Work areas would be reduced to the maximum extent feasible.	During construction, work areas are to be reduced to the maximum extent feasible.	Final Design Construction	During Design Check Continuous	Ventura Public Works			
<b>BIO-2</b> : Equipment staging and storage areas for vehicles, equipment, material, fuels, lubricants, and solvents would be restricted to designated areas and would be a minimum of 50 feet from Santa Paula Creek, Side Channel A, and Side Channel B.	Equipment staging, and storage areas for vehicles, equipment, materials, fuels, lubricants, and solvents are to be restricted to designated areas a minimum of 50 feet from Santa Paula Creek, Side Chanel A, and Side Chanel B.	Pre- Construction Construction	During Staging Plan Check Continuous	Ventura Public Works			
<b>BIO-3:</b> Best Management Practices (BMP), such as silt fencing, fiber rolls, straw bales, or other measures would be implemented during	Best Management Practices such as silt fencing, fiber rolls,	Pre- Construction Construction	During SWPPP Review Continuous	Ventura Public Works			

			MONITORING FREQUENCY	RESPONSIBLE	COMPLIANCE VERIFICATION			
AVOIDANCE, MINIMIZATION, AND MITIGATION MEASURES	ACTION REQUIRED	TIMING/PHASE		AGENCY OR PARTY	INITIAL	DATE	COMMENTS	
construction to minimize dust, dirt, and construction debris from entering the jurisdictional features, and/or leaving the construction area.	straw bales, or other measures are to be implemented during construction to minimize dust, dirt, and construction debris from entering the jurisdictional features, and/or leaving the construction area.							
<b>BIO-4:</b> Appropriate hazardous material BMPs would be implemented to reduce the potential for chemical spills or contaminant releases into the jurisdictional features including any nonstormwater discharge.	Appropriate hazardous material BMPs are to be implemented to reduce the potential for chemical spills or containment releases into jurisdictional features including any non-stormwater discharge.	Construction	Continuous	Ventura Public Works				
BIO-5: All equipment refueling, and maintenance would be conducted in the staging area away from Santa Paula Creek, Side Channel A, and Side Channel B. In addition, vehicles and equipment would be checked daily for fluid and fuel leaks, and drip pans would be placed under all equipment that is parked and not in operation. Any leaking vehicle or equipment would not be operated in the project area until repaired. All workers would be informed of the importance of preventing spills and the appropriate measures to take should a spill happen.	All equipment refueling and maintenance is to be conducted in the staging area away from Santa Paula Creek. Equipment is to be checked daily for fluid and fuel leaks and drip plans are to be placed under all equipment that is parked and not in operation.	Pre- Construction Construction	During Staging Plan Check Continuous	Ventura Public Works				
<b>BIO-6:</b> Stationary equipment such as motors, pumps, generators, compressors, and welders located within 100 feet of the jurisdictional features	Stationary equipment within 100 feet of the jurisdictional features	Final Design Construction	During Plan Check Continuous	Ventura Public Works				

			Monitoring	RESPONSIBLE	COMPLIANCE VERIFICATION			
AVOIDANCE, MINIMIZATION, AND MITIGATION MEASURES	ACTION REQUIRED	TIMING/PHASE	FREQUENCY	AGENCY OR PARTY	INITIAL	DATE	COMMENTS	
would be positioned over drip-pans, including when in operation.	is to be positioned over drip pans, including when in operation.							
<b>BIO-7</b> : Any temporary erosion control implemented during construction would be completed using noninvasive species. At project completion, all temporarily disturbed areas would be re-contoured to pre-construction conditions.	Any temporary erosion control implemented during construction is to be completed using noninvasive species. At project completion all temporarily disabled areas are to be recontoured.	Final Design Construction Post Construction	During Plan Check Continuous Following Installation of Erosion Control	Ventura Public Works				
BIO-8: Mitigation for temporary impacts on riparian habitat will be accomplished through on-site revegetation at a minimum ratio of 1:1 or through the removal of invasive species. However, the final ratio will be established through consultation and coordination with regulatory agencies during the permitting process.	Mitigation for temporary impacts on riparian habitats is to be accomplished through on-site revegetation.	Final Design Post- Construction	During Permitting Continuous	Ventura Public Works				
<b>BIO-9:</b> Vegetation removal would be avoided to the maximum extent feasible.	Vegetation removal is to be avoided to the maximum extent feasible.	Final Design Construction	During Plan Check Continuous	Ventura Public Works				
BIO-10: Prior to construction, high visibility Environmentally Sensitive Area (ESA) protective fencing would be installed at the limits of construction to prevent construction staff or equipment from encroaching further into the adjacent natural communities.	High visibility Environmentally Sensitive Area (ESA) protective fencing is to be installed at the limits of construction.	Construction	Prior to Construction	Ventura Public Works				
BIO-11: Prior to construction, a qualified biologist would conduct plant surveys within the construction area. Surveys would be conducted during the appropriate blooming period (June) in the year prior to construction for species with potential to be in the construction area, to the extent feasible. If special-status plant species are found during pre-construction surveys, high	A qualified biologist is to conduct plant surveys within the construction area prior to construction. If plants are found, ESA fencing is to be installed around the	Final Design Pre- Construction	During Plan Check Prior to Construction	Ventura Public Works				

			Monitoring	RESPONSIBLE	COMPLIANCE VERIFICATION			
AVOIDANCE, MINIMIZATION, AND MITIGATION MEASURES	ACTION REQUIRED	TIMING/PHASE	FREQUENCY	AGENCY OR PARTY	INITIAL	DATE	COMMENTS	
visibility ESA protective fencing would be installed around the special-status plants to prevent construction staff or equipment from entering this area, to the maximum extent feasible. The ESA protective fencing buffer would be species specific, with a minimum buffer radius based on the guidance from a qualified biologist.	plants under direction of a qualified biologist.							
<b>BIO-12:</b> All project-related vehicle traffic would be restricted to established roads and construction areas, which include equipment staging, storage, parking, and stockpile areas.	During construction all project-related vehicle traffic is to be restricted to established roads and construction areas.	Pre- Construction Construction	During Traffic Plan Review Continuous	Ventura Public Works				
BIO-13: If it is determined that special-status plants will be directly impacted by the project, a species-specific mitigation plan will be prepared by a qualified biologist. The plan may include one or more of the following: plant relocation, seed collection and dispersal, on or off-site restoration, or payment into an agency-approved mitigation bank. The plan will be implemented prior to the completion of the project.	If it is determined that special-status plants will be directly impacted by the project, a species-specific mitigation plan is to be prepared by a qualified biologist.	Construction	Continuous	Ventura Public Works				
BIO-14: Pre-construction wildlife surveys would be conducted within 48 hours prior to the start of construction, including clearing and grubbing. If wildlife species are observed, they would be allowed to leave the area or relocated to a suitable location outside of the project limits prior to initiating work.	Wildlife surveys are to be completed prior to construction. If wildlife species are observed, they would be allowed to leave the area or relocated to a suitable location,	Pre- Construction	48 Hours Prior to Start of Construction	Ventura Public Works				
<b>BIO-15:</b> Prior to construction, a species-specific list (or plan) would be prepared identifying methods for proper handling and relocation and a map of suitable and safe relocation areas.	A species-specific list (or plan) is to be prepared prior to construction	Final Design Pre- Construction	During Plan Check Continuous	Ventura Public Works				
<b>BIO-16</b> : A qualified biologist would conduct biological monitoring during any activities involving vegetation clearing (including ruderal areas), open ditches or pits, or modification of natural habitat. If special-status species are detected, the location	A qualified biologist would conduct biological monitoring during any activities involving vegetation	Construction	During Tree and Vegetation Trimming and Removal	Ventura Public Works				

		TIMING/PHASE	MONITORING FREQUENCY	RESPONSIBLE	COMPLIANCE VERIFICATION			
AVOIDANCE, MINIMIZATION, AND MITIGATION MEASURES	ACTION REQUIRED			AGENCY OR PARTY	INITIAL	DATE	COMMENTS	
would be mapped and photographed and reported to the California Natural Diversity Database.	clearing. If special- status species are detected, details of the location would be shared with the California Natural Diversity Database.							
<b>BIO-17:</b> Vegetation removal would be conducted systematically, starting in the middle of the construction zone, to prevent wildlife from being trapped in vegetation "islands."	Vegetation removal would be conducted systematically to prevent wildlife from being trapped in vegetation islands.	Pre- Construction Construction	Continuous	Ventura Public Works				
<b>BIO-18:</b> If wildlife is detected during construction, it would be allowed to move away on its own (noninvasive, passive relocation), or relocated to adjacent appropriate habitat on site or to suitable habitat adjacent to the project area.	Wildlife detected during construction would be allowed to move away on its own, or relocated to adjacent appropriate habitat on site or to suitable habitat adjacent to the project area.	Construction	Continuous	Ventura Public Works				
<b>BIO-19:</b> Use of muffler equipment. Construction equipment shall be operated with standard factory silencer and/or muffler equipment. Equipment engine covers shall be in place and mufflers shall be in proper working order.	Construction equipment would be operated with standard factory silencer and/or muffler equipment. Equipment engine covers would be in place and mufflers would be in proper working order.	Final Design Construction	During Plan Check Continuous	Ventura Public Works				
BIO-20: Locate haul routes away from sensitive receptors. Haul routes, staging areas, and construction activities shall be located to avoid noise impacts to sensitive receptors (schools, hospitals, residential areas, wildlife, etc.), whenever	Haul routes, staging areas, and construction activities are to be located to avoid noise impacts to	Final Design Construction	During Plan Check Continuous	Ventura Public Works				

	ACTION REQUIRED	TIMING/PHASE	MONITORING FREQUENCY	RESPONSIBLE AGENCY OR PARTY	COMPLIANCE VERIFICATION			
AVOIDANCE, MINIMIZATION, AND MITIGATION MEASURES					INITIAL	DATE	COMMENTS	
possible. If necessary, noise curtains or shields shall be implemented to reduce noise levels to the extent feasible.	sensitive receptors Noise curtains or shields are to be implemented to reduce noise levels to the extent feasible.							
<b>BIO-21:</b> Pre-construction amphibian surveys would be conducted two weeks prior to start of construction by a qualified biologist.	Amphibian surveys are to be conducted two weeks prior to the start of construction by a qualified biologist.	Pre- Construction	Two weeks prior to construction	Ventura Public Works				
BIO-22: If the California red-legged frog is found in the construction area, the encounter would be treated on a case-by-case basis in coordination with regulatory agencies, but the general procedure would be as follows: (1) work would immediately be suspended in the vicinity of the animal; (2) a qualified biologist would evaluate the animal; (3) the animal would not be disturbed if it is not in danger and would be allowed to exit the construction site on its own.	If the California red- legged frog is found in the construction area, the encounter is to be treated on a case-by- case basis in coordination with regulatory agencies.	Construction	Continuous	Ventura Public Works				
BIO-23: Prior to the initiation of any work, including installation of exclusion fencing or clearing and grubbing activities, a qualified biologist would conduct an environmental worker awareness training for all project personnel. The training would discuss the sensitive habitats and special-status species with the potential to be within the project area and would review the project's avoidance and minimization measures, and permitting conditions associated with biological resources.	Prior to construction, a qualified biologist is to conduct an environmental worker awareness training for all project personnel.	Pre- Construction	Prior to Construction	Ventura Public Works				
BIO-24: Following completion of pre-construction surveys, wildlife exclusion fencing would be erected around the entire construction area, including on the creek banks, to prohibit wildlife from entering the active project area. Wildlife exclusion fencing would consist of construction grade polypropylene or similar fabric. The exclusion fencing would be a	Following pre- construction wildlife surveys, wildlife exclusion fencing is to be erected around the entire construction area in accordance	Final Design Pre- Construction Construction Post- Construction	During Plan Check Prior to construction Weekly Following Construction	Ventura Public Works				

			Monitoring	RESPONSIBLE	COMPLIANCE VERIFICATION			
AVOIDANCE, MINIMIZATION, AND MITIGATION MEASURES	ACTION REQUIRED	TIMING/PHASE	FREQUENCY	AGENCY OR PARTY	INITIAL	DATE	COMMENTS	
minimum of three feet tall above ground and be buried a minimum of four inches underground, when feasible, with the base folded, so wildlife cannot burrow beneath or create entry points. The exclusion fencing would remain in place throughout the duration of construction activities and would be inspected weekly and maintained in good working order by the construction contractor, under the direction of the Project Engineer and with the guidance of a qualified biologist. The exclusion fencing would be periodically inspected for trapped wildlife by a qualified biologist. The fencing would be completely removed following construction.	with specifications given. The fencing is to be inspected weekly by the contractor and periodically by a qualified biologist. The fencing is to be removed following construction.							
BIO-25: Initial ground-disturbing activities would be avoided between November 1 and March 31, which is when California red-legged frogs are most likely to be moving through upland areas.	Initial ground- disturbing activities are to be avoided between November 1 and March 31.	Pre- Construction Construction	During Construction Phasing Continuous	Ventura Public Works				
BIO-26: Following completion of daily work activities, any temporary breaks in the wildlife exclusion fencing to allow for construction would be restored Any temporary breaks in the wildlife exclusion fencing would be conducted under the supervision of the Project Engineer and under the guidance of a qualified biologist.	At the end of each work day, any temporary breaks in the wildlife exclusion fencing to allow for construction are to be restored.	Construction	Daily	Ventura Public Works				
BIO-27: Materials stored on-site that could provide shelter for California red-legged frog, such as onsite storage of pipes, conduits, and other materials, would be placed in an open-top trailer to elevate materials off the ground.	Materials stored on- site such as, pipes conduits and other materials are to be placed in an open-top trailer.	Construction	Continuous	Ventura Public Works				
<b>BIO-28:</b> Trenches or pits one foot or deeper that are left unfilled for more than 48 hours would be securely covered with boards or other similar material to prevent entrapment of California redlegged frog.	During construction, any trenches or pits one feet or deeper that are left unfilled for more than 48 hours are to be securely covered with	Construction	Continuous	Ventura Public Works				

			MONITORING	RESPONSIBLE	COMPLIANCE VERIFICATION		
AVOIDANCE, MINIMIZATION, AND MITIGATION MEASURES	ACTION REQUIRED	TIMING/PHASE	FREQUENCY	AGENCY OR PARTY	INITIAL	DATE	COMMENTS
	boards or other similar material.						
BIO-29: No construction activities would be allowed during measurable rainfall or within 24-hours following rainfall with precipitation greater than ¼ inch. Prior to construction activities resuming, a qualified biologist would inspect the construction rea and all equipment/materials for the presence of the California red-logged frog.	No construction activities are to be allowed during measurable rainfall, or within 24 hours following rainfall.	Final Design Construction	During Plan Check Continuous	Ventura Public Works			
BIO-30: Take or suspected take of listed wildlife species would be reported immediately to a qualified biologist. A qualified biologist would be required to report the incident, or suspected incident, to the wildlife agencies within 24 hours.	Take or suspected take of listed wildlife species is to be be reported immediately to a qualified biologist and is to be reported and to the wildlife agencies within 24 hours.	Construction	Continuous	Ventura Public Works			
BIO-31: No pets would be allowed in the construction area, to avoid and minimize the potential for harassment, injury, and death of wildlife.	No pets would be allowed in the construction area.	Construction	Continuous	Ventura Public Works			
<b>BIO-32:</b> Plastic monofilament netting, or similar material in any form, would not be used at the construction area.	Plastic monofilament netting or similar material is not to be used at the construction area.	Final Design Construction	During Plan Check Continuous	Ventura Public Works			
<b>BIO-33:</b> Trimming and removal of vegetation and trees would be minimized and performed outside of the nesting season (February 15 to August 31), to the extent feasible.	During construction, trimming and removal of vegetation and trees is to be minimized and performed between September 1 and February 14.	Pre- Construction Construction	During Construction Phasing Continuous	Ventura Public Works			
<b>BIO-34:</b> In the event that trimming, or removal of vegetation and trees must be conducted during the nesting season, nesting bird surveys would be completed within 500 feet of the construction area,	If trimming or removal of vegetation and trees is required during the nesting	Construction	During Tree and Vegetation Trimming and Removal	Ventura Public Works			

			MONITORING	RESPONSIBLE	COMPLIA	NCE VERIFICA	TION
AVOIDANCE, MINIMIZATION, AND MITIGATION MEASURES	ACTION REQUIRED	TIMING/PHASE	FREQUENCY	AGENCY OR PARTY	INITIAL	DATE	COMMENTS
as feasible, by a qualified biologist no more than 48 hours prior to trimming or clearing activities to determine if nesting birds are within the vegetation that would be trimmed or removed. Nesting bird surveys would be repeated if trimming or removal activities are suspended for five days or more.	season, nesting bird surveys are to be completed within 500 feet of the construction area by a qualified biologist no more than 48 hours prior to trimming or clearing activities. Surveys are to be repeated if trimming or removal activities are suspended for five days or more.						
BIO-35: If nesting birds are found within 500 feet of the construction area, appropriate buffers (typically 300 feet for birds and 500 feet for raptors) consisting of orange flagging/fencing or similar would be installed and maintained until nesting activity has ended, as determined in coordination with a qualified biologist and regulatory agencies, as appropriate.	If nesting birds are found within 500 feet of the construction area, appropriate buffers (typically 300 feet for birds and 500 feet for raptors) consisting of orange flagging/fencing are to be installed and maintained as directed by a qualified biologist.	Final Design Construction	During Plan Check Continuous	Ventura Public Works			
<b>BIO-36:</b> Construction within Santa Paula Creek would be limited to between June 15 and October 15.	Construction is to be limited between June 15 and October 15.	Final Design Pre- Construction Construction	During Plan Check During Construction Phasing Continuous	Ventura Public Works			
BIO-37: A qualified biologist approved by NMFS and CDFW would be onsite during construction activities that could impact the federally listed fish species. The biologist would provide on-site guidance to limit disturbance to the species and its habitat.	A qualified biologist approved by NMFS and CDFW is to be onsite during construction activities	Final Design Construction	During Plan Check Continuous	Ventura Public Works			

			Monitoring	RESPONSIBLE	COMPLIANCE VERIFICATION			
AVOIDANCE, MINIMIZATION, AND MITIGATION MEASURES	ACTION REQUIRED	TIMING/PHASE	FREQUENCY	AGENCY OR PARTY	INITIAL	DATE	COMMENTS	
	that could impact fish species.							
structure/culvert placed within a waterway where fish have potential to be present would be designed, constructed, and maintained such that they would not constitute a barrier to upstream or downstream movement of aquatic life or cause an avoidance reaction by fish that impedes their upstream or downstream movement. This would include, but would not be limited to, the supply of water at an appropriate depth, temperature, and velocity to facilitate upstream and downstream fish migration.	Any structure/culvert to be placed within a waterway where fish have potential to be present is to be designed, constructed, and maintained such that it will not constitute a barrier upstream or downstream.	Construction	Continuous	Ventura Public Works				
BIO-39: A qualified biologist would conduct visual surveys of the North and South BSA during the flight season for the Crotch bumble bee (late February through late October). Between two and four evenly spaced surveys would be completed for the highest detection probability, including surveys in early spring (late March/early April) and early summer (late June/July). Surveys would take place when temperatures are above 60 degrees Fahrenheit, preferably on sunny days with low wind speeds.	A qualified biologist is to conduct visual surveys of the North and South BSA during the flight season for the Crotch bumble bee (late February through late October) as specified.	Pre- Construction	February through October	Ventura Public Works				
BIO-40: If surveys cannot be completed, all small mammal burrows and thatched/bunched grasses would be avoided by a minimum of 50 feet to avoid take and potentially significant impacts. If ground disturbing activities would occur during the overwintering period (October through February), consultation with CDFW would be conducted to discuss how to implement project activities and avoid take. If Crotch bumble bee are detected prior to or during project implementation, consultation with CDFW would be conducted to discuss how to avoid take.	If a survey cannot be completed, all small mammal burrows and thatched/bunched grasses are to be avoided by a minimum of 50 feet. If construction will take place between October and February, and/or the Crotch bumble bee is detected, consultation	Final Design Pre- Construction Construction	During Plan Check During Agency Coordination Continuous	Ventura Public Works				

			Monitoring	RESPONSIBLE	COMPLIA	NCE VERIFICA	TION
AVOIDANCE, MINIMIZATION, AND MITIGATION MEASURES	ACTION REQUIRED	TIMING/PHASE	FREQUENCY	AGENCY OR PARTY	INITIAL	DATE	COMMENTS
	with CDFW is to be conducted.						
<b>BIO-41:</b> If take of Crotch bumble bee cannot be avoided, take authorization prior to any ground-disturbing activities would be conducted. Take authorization would be completed through the issuance of an Incidental Take Permit, pursuant to California Fish and Game Code 2081(b).	If take of Crotch bumble bee cannot be avoided, authorization is to be obtained from CDFW through an Incidental Take Permit.	Pre- Construction	During Agency Coordination	Ventura Public Works			
<b>BIO-42:</b> Where feasible, tree removal would be conducted outside of the maternal and non-active seasons for bats (October).	Tree removal is to be conducted outside of the maternal and nonactive season for bats (October).	Construction	Continuous	Ventura Public Works			
BIO-43: During the summer months (June to August) prior to construction, an evening emergence survey would be conducted for all identified roosting habitat to assess the presence of day-roosting bats. If presence of a roost is detected, a count and species analysis would be completed to help assess the type of colony and usage.	During summer months (June to August) prior to construction, an evening emergence survey is to be conducted for all identified roosting habitat to assess the presence of dayroosting bats.	Final Design	During Final Design	Ventura Public Works			
BIO-44: If the presence or absence of bats cannot be confirmed in potential roosting habitat, a qualified biologist would be onsite during removal or disturbance of this habitat. If the biologist determines that bats are being disturbed during this work, work would be suspended until bats have left the vicinity on their own or can be safely excluded under direction of the biologist. Work would resume only once all bats have left the site and/or approval to resume work is given by a qualified biologist.	If the presence or absence of bats cannot be confirmed in potential roosting habitat, a qualified biologist is to be onsite during removal or disturbance of this habitat.	Final Design Construction	During Plan Check During Disturbance of Potential Habitat	Ventura Public Works			
<b>BIO-45:</b> After completion of the bat roosting habitat assessment, all trees with potential day roosting habitat would be removed using a 2-step process	All trees with potential day roosting bat habitat are to be	Final Design Construction	During Plan Check	Ventura Public Works			

			MONITORING	RESPONSIBLE	COMPLIA	NCE VERIFICAT	ΓΙΟΝ
AVOIDANCE, MINIMIZATION, AND MITIGATION MEASURES	ACTION REQUIRED	TIMING/PHASE	FREQUENCY	AGENCY OR PARTY	INITIAL	DATE	COMMENTS
over two consecutive days and under the supervision of a qualified biologist. On the first day, all non-habitat trees adjacent to and/or surrounding potential habitat trees, as identified by the qualified biologist, would be removed (or trimmed, if full removal can be avoided) using hand tools. In addition, limited trimming of the potential bat roosting habitat trees (branches and small limbs with no potential roosting features) would be completed on the first day, also using hand tools. On the second day, all of the potential habitat trees that were previously trimmed and/or avoided during step one would be removed.	removed using a 2- step process over two consecutive days and under the supervision of a qualified biologist.		During Tree Removal				
BIO-46: In the event that a maternal colony of bats is found, no work would be conducted within 100 feet of the maternal roosting site until the maternal season is finished or the bats have left the site, or as otherwise directed by a qualified biologist. The site would be designated as a sensitive area and protected as such until the bats have left the site. No activities would be authorized adjacent to the roosting site. Combustion equipment, such as generators, pumps, and vehicles, would not be parked or operated under or adjacent to the roosting site. Construction personnel would not be authorized to enter areas beneath the colony, especially during the evening exodus (typically between 15 minutes prior to sunset and one hour following sunset).	If a maternal colony of bats is found, work is not to be conducted within 100 feet of the maternal roosting site until the maternal season is finished or the bats have left the site.	Final Design Construction	During Plan Check Continuous	Ventura Public Works			
BIO-47: Pre-construction surveys for special-status reptiles would be conducted by a qualified biologist no more than 24 hours prior to construction.  Surveys would be repeated if construction activities are suspended for five days or more. If these species, or other non-special status reptiles, are observed within the construction area, a qualified biologist would capture and relocate them to suitable habitat at least 100 feet outside of the construction area.	Pre construction surveys for special-status reptiles are to be conducted by a qualified biologist no more than 24 hours prior to construction.	Final Design Pre- Construction	During Plan Check Prior to Construction	Ventura Public Works			

			MONITORING	RESPONSIBLE	COMPLIANCE VERIFICATION			
AVOIDANCE, MINIMIZATION, AND MITIGATION MEASURES	ACTION REQUIRED	TIMING/PHASE	FREQUENCY	AGENCY OR PARTY	INITIAL	DATE	COMMENTS	
Cultural Resources								
<b>CUL-1</b> : If previously unidentified cultural materials are encountered or unearthed during construction, work will be halted in that area until a qualified archaeologist can assess the nature and significance of the find. Additional surveys will be required if the project limits change to include areas not previously surveyed.	If cultural materials are encountered, work is to be halted in the area until a qualified archaeologist can assess the nature and significance of the find. Additional surveys are required if the project limits change.	Construction	During Ground Disturbing Activities	Ventura Public Works				
CUL-2: In the event of the accidental discovery or recognition of any human remains in any location other than a dedicated cemetery, steps will be taken in compliance with the California Code of Regulations, title 14 (14 CCR), Section 15064.5. All construction activities will cease, and the County Coroner will be contacted if any human remains are discovered, in accordance with 14 CCR Section 15064.5(e). If the coroner determines that the human remains are of Native American origin, the NAHC will be notified to determine the most likely descendent (MLD) for the area. The MLD will make recommendations for the arrangements for the human remains per Public Resources Code (PRC) Section 5097.98.	If any human remains are discovered all construction activities are to cease, and the City Coroner is to be contacted. Steps are to be taken in compliance with the CCR Section 15064.5.	Construction	During Ground Disturbing Activities	Ventura Public Works				
Geology and Soils								
<b>GEO-1:</b> Prior to approval of final plans, a geotechnical study would be completed by an engineering geologist or equivalent to evaluate seismic and non-seismic soil conditions, including but not limited to expansion potential, subsidence, slope stability and corrosiveness. This report would include evaluation of soil characteristics, identification of potential soil concerns and appropriate measures to address site specific soil conditions. Recommendations of the geotechnical study would be incorporated into the final design	A geotechnical study is to be completed by an engineering geologist or equivalent. The study is to be submitted to Ventura County Public Works for review and approval.	Final Design	During Final Design	Ventura Public Works				

			Monitoring	RESPONSIBLE	COMPLIANCE VERIFICATION			
AVOIDANCE, MINIMIZATION, AND MITIGATION MEASURES	ACTION REQUIRED	TIMING/PHASE	FREQUENCY	AGENCY OR PARTY	INITIAL	DATE	COMMENTS	
plans. The final geotechnical study would be submitted to Ventura County Public Works for review and approval.								
<b>GEO-2:</b> If previously unidentified paleontological resources are encountered or unearthed during construction, work would be halted in that until a qualified paleontologist can assess the nature and significance of the find. Additional surveys would be required if the project limits change to include areas not previously surveyed.	If paleontological resources are encountered, work is to be halted in the area until a qualified paleontologist can assess the nature and significance of the find. Additional surveys are required if the project limits change.	Final Design Construction	During Plan Check During Ground Disturbing Activities	Ventura Public Works				
GEO-3: Access to any well located on the property would be maintained in the event abandonment or re-abandonment of the well becomes necessary in the future. Impeding access to a well could result in the need to remove any structure or obstacle that prevents or impedes access. This includes, but is not limited to, buildings, housing, fencing, landscaping, trees, pools, patios, roads, sidewalks, and decking. Maintaining sufficient access is considered the ability for a well servicing unit and associated necessary equipment 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, would be able to pass unimpeded along and over the route, and would be able to access the well without disturbing the integrity of surrounding infrastructure.	Access to any well located on the property would be maintained in the event abandonment or re-abandonment of the well becomes necessary in the future.	Final Design	During Final Design					
<b>GEO-4:</b> No well work would be performed on any oil or gas well without written approval from CalGEM in the form of an appropriate permit. This includes, but is not limited to, mitigating leaking fluids or gas from abandoned wells, modifications to well casings including plating, and/or any other abandonment or re-abandonment work. If any well needs to be	No well work is to be performed without written approval from CalGEM.	Final Design	During Final Design					

			MONITORING	RESPONSIBLE	COMPLIANCE VERIFICATION			
AVOIDANCE, MINIMIZATION, AND MITIGATION MEASURES	ACTION REQUIRED	TIMING/PHASE	FREQUENCY	AGENCY OR PARTY	INITIAL	DATE	COMMENTS	
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.								
<b>GEO-5:</b> 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, information regarding the identified well(s), and any other pertinent information obtained, would be communicated to the appropriate county recorder for inclusion in the title information of the subject real property.	Information regarding the identified wells is to be communicated to the Ventura County for inclusion in the title information of the subject real property.	Final Design	During Plan Check					
<b>GEO-6:</b> Any soil containing significant amounts of hydrocarbons would be disposed of in accordance with local, state, and federal laws. Appropriate authorities would be notified if soil containing significant amounts of hydrocarbons is discovered during development.	Soil containing significant amounts of hydrocarbons is to be disposed of in accordance with applicable laws. Appropriate authorities would be notified if soil containing significant amounts of hydrocarbons is discovered during development.	Final Design	During Final Design					
Greenhouse Gas Emissions							_	
<b>GHG-1:</b> A traffic management plan would be developed and implemented in accordance with the 2018 Caltrans Standard Specifications and must comply with the California Manual on Uniform Traffic Control Devices, Part 6, "Temporary Traffic Control"	A traffic management plan is to be developed and implemented.	Final Design Pre- Construction	During Plan Check During Development of Traffic Management Plan	Ventura Public Works				
Hydrology and Water Quality							_	
<b>WQ-1:</b> Work areas would be reduced to maximum extent feasible	The work area is to be reduced to the maximum extent	Final Design Construction	During Plan Check Continuous	Ventura Public Works				

			Monitoring	RESPONSIBLE	COMPLIANCE VERIFICATION			
AVOIDANCE, MINIMIZATION, AND MITIGATION MEASURES	ACTION REQUIRED	TIMING/PHASE	FREQUENCY	AGENCY OR PARTY	INITIAL	DATE	COMMENTS	
	feasible for construction.							
<b>WQ-2:</b> Equipment staging areas and storage areas for vehicles, equipment, materials, fuels, lubricants, solvents, etc. would be restricted to designated areas and would not be located within Santa Paula Creek.	Equipment staging areas and storage areas are to be restricted to designated areas outside of Santa Paula Creek.	Pre- Construction Construction	During Construction Phasing Continuous	Ventura Public Works				
WQ-3: Erosion control BMPs (e.g., silt fencing and fiber rolls) would be implemented to minimize dust, dirt, debris resulting from construction activities entering Santa Paula Creek and to protect the water quality of Santa Paula Creek pursuant to the requirements of the regulatory permits (i.e., CWA Section 404/401 and California Fish and Game Code Section 1602) issued for this project.	Erosion control BMPs are to be implemented to reduce potential for dust, dirt, debris to enter Santa Paula Creek.	Pre- Construction Construction	During SWPPP Review Continuous	Ventura Public Works				
<b>WQ-4</b> : Appropriate hazardous material BMPs (e.g., on-site spill prevention kit) would be implemented to minimize the potential affects for chemical spills, containment releases, and non-storm water discharge into Santa Paula Creek.	Hazardous materials BMPs are to be implemented to reduce potential for containments to enter Santa Paula Creek.	Final Design Construction	During Plan Check Continuous	Ventura Public Works				
WQ-5: All equipment refueling, and maintenance would be conducted in the staging area away from Santa Paula Creek in accordance with Caltrans' standard specifications and requirements of the regulatory permits issued for this project. In addition, vehicles and equipment would be checked daily for fluid and fuel leaks and drip pans would be placed under all equipment that is parked and not in operation. Any leaking vehicle or equipment would not be operated in the project area until repaired. All workers would be informed of the importance of preventing spills and the appropriate measures to take should a spill occur.	All equipment refueling and maintenance is to be conducted in the staging area away from Santa Paula Creek.	Pre- Construction Construction	During Construction Staging Continuous	Ventura Public Works				
<b>WQ-6:</b> Following completion of construction activities, appropriate erosion control measures would be implemented to ensure that soils	Appropriate erosion control measures are to be implemented to	Pre- Construction	During SWPPP Review	Ventura Public Works				

			MONITORING	RESPONSIBLE	COMPLIANCE VERIFICATION			
AVOIDANCE, MINIMIZATION, AND MITIGATION MEASURES	ACTION REQUIRED	TIMING/PHASE	FREQUENCY	AGENCY OR PARTY	INITIAL	DATE	COMMENTS	
disturbed by construction are stabilized to minimize non-storm water discharges into Santa Paula Creek and meet the requirements of the regulatory permits issued for this project (i.e., CWA Section 404/401 and California Fish and Game Code Section 1602)	stabilize soils disturbed by and minimize non-storm water discharges into Santa Paula Creek.	Post Construction	Following Installation of Erosion Control					
WQ-7: All disturbance to aquatic habitat, including jurisdictional waters, would be minimized with the use of environmentally sensitive area fencing and all soil exposed as a result of project construction would be revegetated using native-plant hydroseeding or live planting methods. Restoration would be at a minimum ratio of 1:1, or as agreed upon as part of regulatory permitting.	Environmentally sensitive area fencing is to be installed to minimize disturbance of aquatic habitat. and all soil exposed as a result of project construction would be revegetated using native plant hydroseeding.	Final Design Construction Post- Construction	During Plan Check Continuous During Installation of Restoration	Ventura Public Works				
<b>WQ-8:</b> Any temporary erosion control implemented during construction would be completed using noninvasive species.	Any temporary erosion control implemented is to be completed using non- invasive species.	Final Design Construction	During Plan Check Continuous	Ventura Public Works				
Noise								
NOI-1: Limit hours of hand-held equipment use. Use of loud hand-held construction equipment, such as chain saws, heavy-duty construction equipment, and trucks shall not occur between the hours of 7:00 p.m. and 7:00 a.m., except for dredging, slurrying, and associated water, conveyance activities, which are planned to occur 24 hours a day, 7 days a week.	Use of loud hand-held construction equipment would not occur between the hours of 7:00 p.m. and 7:00 a.m.	Final Design Construction	During Plan Check Continuous	Ventura Public Works				
<b>NOI-2:</b> Limit hours of heavy-duty equipment use. Within the City of Santa Paula, use of heavy-duty construction equipment or trucks shall not occur between the hours of 7:00 p.m. and 10:00 a.m.	Use of heavy-duty construction equipment or trucks would not occur between the hours of 7:00 p.m. and 10:00 a.m.	Final Design Construction	During Plan Check Continuous	Ventura Public Works				

			Monitoring	RESPONSIBLE	COMPLIANCE VERIFICATION			
AVOIDANCE, MINIMIZATION, AND MITIGATION MEASURES	ACTION REQUIRED	TIMING/PHASE	FREQUENCY	AGENCY OR PARTY	INITIAL	DATE	COMMENTS	
NOI-3: Use of electric motors. The construction contractor shall use electric motors to the extent feasible for all stationary equipment (i.e., pumps). Stationary equipment shall be enclosed to limit impacts to recreational users.	Electric motors are to be used to the extent feasible for all stationary equipment. Stationary equipment would be enclosed to limit impacts to recreational users.	Final Design Construction	During Plan Check Continuous	Ventura Public Works				
NOI-4: Use of hearing protection. Hearing protection shall be provided to all worksite personnel as needed for Construction During general construction activities to meet the requirements of OSHA standards (29 CFR 1910.95, Subpart G) and U.S. EPA standards. In the event of complaints by worksite personnel, a Noise Monitoring Program shall be implemented as discussed in OSHA 29 CFR 1910.95, Subpart G, Appendix G.	Hearing protection would be provided to all worksite personnel as needed. In the event of complaints by worksite personnel, a Noise Monitoring Program would be implemented as specified.	Construction	Continuous	Ventura Public Works				
NOI-5: Public notice of construction. The construction contractor shall provide advance notice of the start of construction for the project to all residences within one mile of the main construction area (i.e. Bridge Road Bridge). The announcement shall state specifically where and when construction will occur and provide contact information for public questions or comments. The construction contractor shall serve as the contact person in the event that noise levels during construction become disruptive to local residents. A sign shall be posted at the various sites with the contact phone number, and include general contact information for public questions or comments.	Advance notice of the start of construction for the project is to be provided to all residences within one mile of the main construction area. A sign is to be posted at the various sites for public questions or comments.	Pre- Construction	Two weeks prior to construction	Ventura Public Works				
NOI-6: Noise monitoring. In the event of complaints by local residents, the construction contractor shall monitor noise from construction activity. Noise shall be measured at the exterior wall(s) of those residents filing a complaint or a representative location. In the event that construction noise exceeds the specified limits (1-hour Leq of 55 dBA),	In the event of complaints by local residents, the construction contractor shall monitor noise from construction activity.	Construction	Continuous	Ventura Public Works				

			Monitoring	RESPONSIBLE	COMPLIANCE VERIFICATION			
AVOIDANCE, MINIMIZATION, AND MITIGATION MEASURES	ACTION REQUIRED	TIMING/PHASE	FREQUENCY	AGENCY OR PARTY	INITIAL	DATE	COMMENTS	
the responsible construction activity shall cease until appropriate measures are implemented to reduce noise levels to the extent feasible.	In the event that construction noise exceeds the specified limits, the responsible construction activity shall cease until appropriate measures are implemented to reduce noise levels to the extent feasible.							
Wildfire								
WDF-1: A Construction Fire Prevention Plan would be prepared and approved by the Ventura County Fire Protection District. The Construction Fire Prevention Plan would implement fire safety measures during construction activities in compliance with applicable subsections of Chapter 33 of the 20191 California Fire Code, the National Fire Protection Association Standard 51B, and the Section 4442 of the California PRC.	A construction fire prevention plan is to be prepared and approved by the Ventura County Fire Protection District	Pre- Construction Construction	During Preparation of Plan Continuous	Ventura Public Works				
<b>WDF-2:</b> Hot work would cease during Red Flag Warning periods declared by the National Weather Service.	During construction, hot work is to cease during red flag warning periods declared by the National Weather Service.	Construction	Continuous	Ventura Public Works				
WDF-3: In the event of a fire on the project area, all construction activities would immediately stop, the construction crew would immediately use the onsite fire extinguishers and the water truck to extinguish the fire, dial 911.	In the event of a fire, all construction activities are to stop immediately, and construction crew is to immediately use onsite fire extinguishers and the water truck and dial 911.	Construction	Continuous	Ventura Public Works				

AVOIDANCE, MINIMIZATION, AND MITIGATION MEASURES	ACTION REQUIRED	TIMING/PHASE	MONITORING FREQUENCY	RESPONSIBLE AGENCY OR PARTY	COMPLIANCE VERIFICATION			
					INITIAL	DATE	COMMENTS	
<b>WDF-4:</b> Contractor would comply with the fire protection provisions contained in Caltrans Standard Specifications No. 7-1.02(m).	The contractor is to comply with the fire protection provisions contained in Caltrans Standard Specifications No.7-1.02(m).	Final Design Construction	During Plan Check Continuous	Ventura Public Works				

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