



Rincon Consultants, Inc.

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RINCON CONSULTANTS, INC. SINCE 1994

May 30, 2025
Project No: 22-13137

Jasmin Kim
Ventura County Resource Management Agency
800 South Victoria Avenue, L#1740
Ventura, California 93009
Via email: Jasmin.Kim@ventura.org

Subject: Review of PL22-0032 ISBA dated May 2024

Dear Ms. Kim:

Rincon Consultants, Inc. (Rincon) reviewed the PL22-0032 Initial Study Biological Assessment (ISBA) Supplemental Letter dated May 2025 for adequacy. The Supplemental Letter evaluates potential impacts and proposed mitigation due to the expansion of the fuel modification zone from 100 feet to 200 feet from structures. While the increase in the fuel modification zone would result in a greater magnitude of impacts to biological resources (e.g., Catalina mariposa lily, protected trees, jurisdictional waters) than previously considered, the nature of the impacts would not change significantly. The revised mitigation measures provided in the Supplemental Letter (in conjunction with the remaining mitigation measures outlined in the May 2024 ISBA) would address impacts to these resources. However, Rincon recommends amplifying Mitigation Measure 15 as described below.

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

This measure specifies on-site restoration and enhancement of riparian habitat adjacent to the impacted area at a 1:1 ratio. Please be advised that CDFW typically requires a minimum 3:1 ratio for permanent impacts to jurisdictional features.

Please contact Robin Murray at 831-612-0113 if you have any questions.

Sincerely,
Rincon Consultants, Inc.

Robin Murray
Supervising Biologist
rmurray@rinconconsultants.com