County of Ventura Planning Division

800 South Victoria Avenue, Ventura, CA 93009-1740 ○ (805) 654-2488 ○ http://www.ventura.org/rma/planning

Initial Study for Camp Hess Kramer

Section A – Project Description

1. **Project Case Number:** Conditional Use Permit PL21-0051

2. **Name of Applicant:** Camp Hess Kramer, Inc.

3. **Project Location and Assessor's Parcel Numbers:**
   11495 and 11677 Pacific Coast Highway, Malibu CA 90265
   Assessor Parcel Numbers: 700-0-070-450, 700-0-060-310,700-0-060-140, 700-0-060-260

4. **General Plan Land Use Designation and Zoning Designation of the Project Site:**

   a. **General Plan Land Use Designation:** Rural and Open Space

   b. **Coastal Area Plan Land Use Designation:** Residential Rural 1 DU/2AC (Residential Rural, one dwelling unit per two acres) and Coastal Open Space.

   c. **Zoning Designation:**
      - COS-10 ac-sdf/M (Coastal Open Space, 10 acre minimum parcel size, slope density formula, Santa Monica Mountains overlay zone);
      - CRE-20 ac/M (Coastal Rural Exclusive, 20 acre minimum parcel size, Santa Monica Mountains overlay zone); and
      - CRE-10 ac/M (Coastal Rural Exclusive, 10 acre minimum parcel size, Santa Monica Mountains overlay zone).

5. **Description of the Environmental Setting:** The project site is approximately 187 acres, located in the coastal foothills in the Santa Monica Mountains, immediately north of the State Route 1 (aka Pacific Coast Highway (PCH)) and the Pacific Ocean, in the unincorporated area of Ventura County-South Coast (Attachment A). Camp Hess Kramer "the camp" consists of lower camp, middle camp, upper camp, and a low impact campground. The topography is variable with multiple steep northeast and southwest facing slopes. Most of the areas in lower and middle camp that supported structures are near the toes of relatively steep ascending natural slopes, slope heights are generally greater than 100 feet (ft) above lower camp and greater than 200 ft above middle camp. Little Sycamore Creek flows north to south through middle and lower camp. Several ephemeral drainages terminate at Little Sycamore Creek, the creek contains riparian vegetation, native and non-native trees. At lower camp, four buildings ("The

Browns" and the Conference Center) and a cabin and accessory structure at upper camp, survived the 2018 Woolsey Fire; all other structures were destroyed. A paved road runs along the creek, the road spans over the creek via vehicular bridges.

The lower and middle camps are on the valley floor. Side slopes of Little Sycamore Canyon drain a 4.8 square mile watershed to the Pacific Ocean via a culvert under PCH. Following the Woolsey Fire, the County experienced significant rainfall and the project site suffered destructive flooding in the mainstem and a tributary on the east side of the creek, a landslide from Yerba Buena Road, debris flow from the valley sides, and channel erosion. Sediments deposited in the channel completely blocked several bridge openings and caused flooding throughout lower camp. Ventura County Emergency Coastal Planned Development Permit Case No. PL19-0050 and USACE Case No. SPL-2019-00052-GHL, included the removal of approximately 14,000 cubic yards of sediment and debris from the creek channel.

6. Project Description: The applicant requests a Major Modification, Case No. PL21-0051, to Conditional Use Permit, Case No. LU10-0069, to authorize the reconstruction and continued operation of a recreational camp known as "Camp Hess Kramer." The request includes replacement, restoration, and reconstruction of damaged and destroyed buildings, vehicle and pedestrian bridges, and outdoor activity areas. Walkways and trails, water, and wastewater infrastructure, electrical and communication, storm drainage facilities and lighting will also be repaired, replaced, or constructed. Segments of Little Sycamore Creek will be stabilized, restored, and enhanced to improve overall functionality and protect infrastructure. The Camp will continue to offer a variety of activities including, but not limited to, archery, basketball, climbing, ropes, soccer, tennis, swimming, hiking, arts and crafts, dancing and singing, and worship. The camp is private, and no daily public use is offered. However, Camp Hess Kramer is available by reservation and lease to private groups for camping from August through June, when the summer camp is not in session.

Camp Uses and Population[1]

Overnight Accommodations

The maximum overnight population is 557 guests and staff. Overnight guests and camp staff will sleep in cabins and buildings within three dedicated areas of the camp: Lower Camp, Middle Camp, and Upper Camp (aka Gindling Hilltop). A low-impact campground[2] site that includes seven portable wooden platform structures

[1] Ventura County Coastal Zoning Ordinance (CZO) Sec. 8175-5.4.2.2 (Overnight) and CZO Sec. 8175-5.4.3.2 (Daily) Population Limits in the CRE Zone.

[2] CZO Article 2 Definitions, Campground, Low-Impact: "A campground consisting of camping sites that do not significantly alter the physical setting nor disturb the overall function of the surrounding ecosystem. Low-impact camping sites are used for carry-in, carry out tent camping accessed by foot and have no

would be located in the northeast corner of APN 700-0-060-260. Guests and camp staff hike to the Low Impact Campground platforms and a campfire pit. Portable toilets, supplies and camping equipment will be packed in and packed out, including all trash.

Daily Population

The maximum total daytime population is 657 guests and staff (557 guests and staff associated with overnight population plus 100 daytime visitors). During the summer camp session up to six times the daily population will be 1,113 including guests, staff, and visitors.

Third-Party Events

A maximum of 60 third-party outdoor events are permitted to occur outside the summer camp sessions (August through June), Monday through Sunday from 10:00 a.m. to 12:30 a.m. with lights out and guests and vendors off the outdoor areas of the property by 1:00 a.m. Some guests will remain on the property after 1:00 a.m. in overnight accommodations. Third-party events would be limited to a maximum of 557 people. Temporary outdoor events would occur throughout the camp, while amplified sound will be limited to designated areas as depicted on plan sheet G2.11-G2.14 (Attachment B-3). Camp Hess Kramer will provide all rentals (e.g., tables, chairs, linens, dishes, and silverware), food, and beverages for the outdoor third-party events.

Lower, Middle, and Upper Camps

The three distinct camp areas consist of Lower Camp, Middle Camp and Upper Camp (Gindling Hilltop), as described in detail below. Given the size of the project, full buildout is anticipated to take between 5 and 25+ years as funding allows. Generally, construction efforts would initially focus on Lower and Middle Camps, with Upper Camp construction anticipated to be the last element to be completed.

(1) *Camp Hess Kramer (Lower Camp) – approximately 17 acres zoned CRE20ac/M*

Camp Hess Kramer (Lower Camp) is located within APN 700-0-070-450. Seven structures remain; 4 structures comprise “The Browns,” one is the Conference Center, one is Irmas Hall and on is an existing restroom building. The Browns will be demolished, and the Conference Center will be remodeled. The following buildings will be demolished:

access roads, no permanent structures, a few or no support facilities or services (e.g., picnic areas, trash removal, restrooms).”

Table 1 Buildings to be Demolished		
Building No. [3]	**Use**	**Area (Square Feet)**
The Browns [Building Nos. 9 through 13]	Camp Office, Infirmary, Storeroom, and Guest Rooms 41 through 45	6,509
Irmas Hall (Dining Hall) [Building Nos. 7 and 8]	Overnight Accommodations (First Floor) Dining Hall, Kitchen, Restrooms (Second Floor)	11,574
	Total	**18,083**

The proposed uses and approximate sizes of the buildings, structures, and areas for Lower Camp, are as follows:

Table 2 Camp Hess Kramer Lower Camp Building Table		
Building No.	**Use**	**Gross Floor Area (Square Feet)**[4]
0.N	Parking/Tennis Courts	15,757
1.N	Entrance Booth	50
2.N	Reception/Infirmary/Residence	7,899
3.N	Program Space	5,695
4.N	Program Space	2,657
6.E	Overnight Accommodations	15,106
7.E	Program Space/Staff Housing	14,457
13.N	Dining Hall/Administration	21,113
14.N	Program Space/Executive Housing	10,045
16.E	Restroom	420
17.N	Arts and Crafts	2,044
18.N	Program Space	8,629
19.N	Pool Pump Equipment/Pool Restroom	3,760
Shed O	Storage	120
Shed Q	Storage	120
Shed R	Storage	120
Shed T	Storage	120
Shed V	Storage	120
Shed W	Storage	120
	TOTAL:	**108,352**

[3] Attachment B-3, Seigel & Strain Project Plans, General Sheets G1.01 identify the corresponding Building Numbers.

[4] CZO Article 2, Definitions, Gross Floor Area: The area included within the surrounding exterior walls of all floors or levels of a building, exclusive of unenclosed shafts and courtyards, or, if the structure lacks walls, the area of all floors or levels included under the roofed/covered area of a structure.

(2) *Camp Hess Kramer (Middle Camp) – approximately 11 acres zoned CRE Camp*

Camp Hess Kramer (Middle Camp) is located within APN 700-0-060-310.

The proposed uses and approximate sizes of structures for Middle Camp are as follows:

Table 3
Camp Hess Kramer Middle Camp Building Table

Building No.	Use	Gross Floor Area (Square Feet)[4]
20.N	Overnight Accommodations	2,959
21.N	Overnight Accommodations	2,723
22.N	Overnight Accommodations	2,723
23.N	Overnight Accommodations	2,723
24.N	Overnight Accommodations	2,723
25.N	Overnight Accommodations	2,800
26.N	Overnight Accommodations	2,747
27.N	Overnight Accommodations	2,747
28.N	Overnight Accommodations	1,520
29.N	Overnight Accommodations	1,584
30.N	Overnight Accommodations	1,584
31.N	Overnight Accommodations	1,584
32.N	Overnight Accommodations	1,524
33.N	Overnight Accommodations	1,524
34.N	Overnight Accommodations	1,524
35.N	Overnight Accommodations	1,524
36.N	Overnight Accommodations	2,747
37.N	Overnight Accommodations - Staff	3,445
38.N	Overnight Accommodations - Staff	3,445
39.N	Overnight Accommodations - Staff	4,635
41.N	Maintenance	2,304
Shed F	Domestic Water Pump	100
Shed G	Water Pump	100
Shed H	Yerba Buena Water Company Storage	80
Shed I	Fire Pump Shed	100
	Total:	**51,469**

(3) *Gindling Hilltop Camp (Upper Camp) – approximately 26 acres zoned CRE Gindling Hilltop*

Gindling Hilltop (Upper Camp) is located within APN 700-0-060-140.

The proposed uses and approximate sizes of structures for Upper Camp are as follows:

Table 4 Camp Hess Kramer Upper Camp Building Table			
Building No.	**Use**	**Gross Floor Area (Square Feet)**	**Maximum Floor Area allowed per VCFPD[5]**
43.N	Staff Residence	3,766	3,142
45.N	Dining Pavilion	10,507	8,162
46.N	Arts and Crafts	799	554
47.N	Pool/Shower/Recreation	2,089	1,333
48.N	Pool Pump	161	161
49.N	Administration	1,538	845
50.N	Overnight Accommodations	1,303	1,127
51.N	Overnight Accommodations	1,303	1,127
52.N	Overnight Accommodations	1,303	1,127
53.N	Overnight Accommodations	1,303	1,127
54.N	Overnight Accommodations	1,303	1,127
55.N	Overnight Accommodations	1,303	1,127
56.N	Overnight Accommodations	1,303	1,127
57.N	Overnight Accommodations - Staff	1,303	1,127
58.N	Overnight Accommodations - Caretaker	1,303	1,127
Shed A	Storage	336	336
Shed B	Storage	480	480
Shed C	Storage	400	400
Shed D	Storage	112	112
Shed E	Storage	120	120
Shed E1	Storage	120	120
	Total:	**32,115**	**25,908**

Recreational Areas

Recreational amenities/uses and their location are as follows:

Amenities	Use
Tennis Courts	Building No. 0.N: Parking on the first floor and two tennis courts on the second floor.

[5] VCFPD Fire Prevention Policy 204, Sec. 1.6.4 Floor Area, Gross. The floor area within the inside perimeter of the exterior walls of the building under consideration, exclusive of vent shafts and courts, without deduction for corridors, stairways, ramps, closets, the thickness of interior walls, columns, or other features. The floor area of a building, or portion thereof, not provided with surrounding exterior walls shall be usable area under the horizontal projection of the roof or floor above. The gross floor area shall not include shafts with no openings or interior courts.

Gil Fitch Field	Baseball, soccer and miscellaneous outdoor gatherings, and overflow parking for temporary outdoor events as needed.
Archery	West of Little Sycamore Creek
Volleyball	West of Little Sycamore Creek
Basketball Courts	West of Little Sycamore Creek
Culinary Garden	East of Little Sycamore Creek and south of building 4.N.
Breuer Lawn/Picnic Area/Terraced Seating Area	East of Little Sycamore Creek
Outdoor Recreation Meadow	East of Little Sycamore Creek
Nursery/Leadership Grove	West of Little Sycamore Creek and south of Building 18.N.
Climbing and Ropes Course	East of Little Sycamore Creek
Amphitheater and Plaza	West of Little Sycamore Creek and south of building 19.N
Pool	West of Little Sycamore Creek
15-foot Climbing Wall/Platform	East of Little Sycamore Creek and north of building 19.N
15-Foot Climbing Platform/Informal gathering/seating	East of Little Sycamore Creek and north of the pool.
Outdoor Chapel	East of Little Sycamore Creek and east of building 20.N
Outdoor Assembly and Flag Poles	West of Little Sycamore Creek
Flexible Gathering Space	West of Little Sycamore Creek and east of 25.N./C.8
Outdoor Patio Space	West of Little Sycamore Creek and east of Building 39.N.
Basketball Court	Central Location
Tennis Courts	
Sports Field	
Amphitheater	
Picnic Area	
Confidence building area	
Prayer area	

Trails

Hiking, walking, outdoor education, wildlife viewing, and transportation of supplies, camping equipment, and portable toilet(s) is permitted by the Camp only on existing trails and fire break trails (see Attachment B-3, Sheet G2.10).

Vehicular Access, Bridges and Road Upgrades

Vehicular access into the camp is via PCH to Yerba Buena Road. Buses and vehicles will enter the camp via Gate 1. The main entry will be widened to approximately 30 feet followed by a new 130-foot-long driveway and bus turn-around. Gate 2, east of the Dining Hall/Administration (Building 13.N), will be dedicated for service vehicles, vendors, and secondary access.

The "Gate 3" entrance will continue to be used to access Gildred Hall (Building 14.N) which primarily serves as executive housing for employees. The "Gate 4" entrance will continue to be used for ancillary access to Middle and Upper Camps and adjacent properties.

The access road to Lower and Middle Camp will be widened to 20 feet per Fire Department and Building code requirements. Where allowed, segments of access roads are reduced in width or designated to accommodate and protect existing mature healthy trees.

One existing vehicular bridge (8V)[6] and one existing at-grade crossing (10-A-V, use limited to access existing Yerba Buena Water Company infrastructure) will remain in place. Vehicle bridge (2-V) will be replaced with a 14-foot-wide bridge, and vehicle bridges (4-V and 6-V) will be replaced and widened to 20 feet. Three pedestrian bridges will be replaced (1-P, 7-P (replaced with 3-P), 9-P) and one new pedestrian bridge (5-P) will be constructed.

Parking

A total of 48 parking spaces are required.[7] Parking is consolidated to a new parking structure (Building 0.N) located at Lower Camp west of Gate 1. The parking structure will provide 44 spaces and 4 spaces will be located east of the Dining Hall (Building 13.N).

Temporary overflow parking areas for special events will be located at Gil Fitch Field, the Volleyball Courts, west of the Arts & Crafts area (Building 17.N) and north of the Executive Residence (Building 14.N). No overflow parking will be

[6] Attachment B-3, Seigel & Strain Project Plans General Sheets G2.01-G2.05; numbers in parentheses indicate bridge locations.

[7] On July 3, 2014, the Planning Commission approved Case No. LU10-0069, Camp Hess Kramer's Conditional Use Permit and Variance; the variance allowed a reduction in the required number of parking spaces to 48.

located at Middle Camp. Once Phase 2 of the project is complete, additional overflow parking will be provided at Upper Camp. All temporary parking will be in developed areas of Camp and outside of any fire lanes.

Designated areas are also provided around camp for accessible guest drop-off use.

Drainage and Stormwater

Eight storm drains will be constructed along the creek (Attachment B-6). A range of water quality treatment measures to meet post-construction stormwater requirements will also be constructed and include infiltration basins. These water quality treatment measures are depicted on project plans and labeled as (INF-1)[6], infiltration trenches (INF-2), bioretention (INF-3), permeable pavement (INF-5), bioretention with underdrain (BIO-1), planter boxes (BIO-2), vegetated swales (BIO-3), and vegetated filter strips (BIO-4)(Attachment B-6).

Utilities

There are five existing Southern California Edison (SCE) electric meters at the facility. Two service meters will be replaced and enlarged, two services will be consolidated into one service, and one service will remain as is. Electricity would be installed underground to the extent feasible. Propane will also serve Camp's needs. At creek crossings, utilities would be attached to the bridge deck. To supply backup power during power outages, propane- or diesel-powered generators will be utilized east of 7.E Irmas Hall.

Lighting

All outdoor lighting shall comply with the outdoor lighting standards in the Ventura County Coastal Zoning Ordinance. The project will be subject to approval of a final lighting plan pursuant to Mitgation Measure (MM) BIO-19. Outdoor lighting includes but is not limited to luminaires affixed to structures, installed along driveways, walkways, and parking areas, and security lighting. Temporary lights will also be used.

Estimated Earthwork (Grading)

Estimated earthwork at Lower Camp for structural development, road expansion, bridges, stormwater, and creek restoration will include 27,700 cubic yards (CY) of cut and 13,200 CY of fill.

Estimated earthwork at Middle Camp for structural development, road expansion, bridges, stormwater, and creek restoration will include 16,800 CY of cut and 19,700 CY of fill.

Estimated earthwork at Upper Camp for structural development will be approximately 2,100 CY within the existing building footprints. (Attachment B-6)

Water

The Yerba Buena Water Company will continue to provide water for the Camp as provided in Will Server Letter dated April 18, 2022.

Wastewater

Lower and Middle Camps will continue to utilize the existing sewer collection/conveyance system and the existing advanced Onsite Wastewater Treatment System (OWTS) for treatment and disposal (Attachment C-1).

Lower Camp will include 4-inch sewer lateral extensions from the proposed buildings to the existing sewer collection/conveyance system. Approximately 440 linear feet (LF) of existing sewer lateral will be removed or abandoned in place and approximately 990 LF of proposed 4-inch Polyvinyl Chloride (PVC) Standard Dimension Ratio (SDR) 35 gravity sewer lateral would be constructed. Approximately 230 LF of existing sewer main will be removed or abandoned in place and approximately 220 LF of proposed 6-inch PVC SDR 35 gravity sewer main would be constructed. Fats-Oils-and-Grease Interceptors from the new kitchen facilities will be installed prior to discharging into the existing conveyance system. Two (2) 4-foot diameter sewer manholes would be constructed.

Middle Camp will include 4-inch sewer lateral extensions from the buildings to the existing sewer collection/conveyance system. Approximately 285 LF of existing sewer lateral will be removed or abandoned in place and approximately 1,288 LF of proposed 4-inch PVC SDR 35 gravity sewer lateral would be constructed. Approximately 402 LF of existing sewer main will be removed or abandoned in place and approximately 1,255 LF of proposed with a 6-inch PVC SDR 35 gravity sewer main would be constructed and extended to collect the wastewater from Building 39.N (also referred to as Scout's Grove). Four (4) 4-foot diameter sewer manholes would be constructed.

The reconstruction of bridge 2V and replacement of bridges 4V and 6V will require replacement and re-routing of the sewer force mains. Approximately 365 LF of proposed 3-inch High Density Polyethylene (HDPE) Iron Pipe Size (IPS) Diameter (DR) 11 sewer force main would be constructed. The existing sewer lift stations at the bridge crossings will remain in the same locations. The equipment inside each lift station would be replaced.

Wastewater service for Upper Camp will continue to occur via private onsite wastewater systems (e.g. septic systems). Each system is composed of septic tanks and associated leach fields. Proposed buildings will be connected to the OWTS by 4-inch sewer lateral extensions.

In Lower Camp the existing irrigation system which utilizes potable water will be supplemented with tertiary treated wastewater effluent from the existing advanced OWTS south of Gil Fitch Field. The proposed recycled water system includes a pump within the dosing tank to supply a new 3-inch purple PVC Schedule 80 recycled water main line that will extend approximately 1,300 LF from the OWTS to the vehicular bridge in Lower Camp. The recycled water main will supply tertiary treated recycled water at an average rate of 4,000 gallons per day to irrigate landscaping in the lower camp.

Little Sycamore Creek Restoration

A Geomorphic Conditions Update (Attachment D) and Basis of Design for Little Sycamore Creek, Camp Hess Kramer dated April 2021 Environmental Science Associates (ESA) and accompanying Creek Restoration Plans (Attachment E, Plan Sheets R-1 through R-8) describe and depict the proposed creek restoration activities. These activities, for restoration of Little Sycamore Creek, would occur over a 2.87-acre area and includes the removal of approximately 1.5 acres of existing vegetation to complete the 4,329 LF of restoration work. Creek restoration activities would involve: 1) excavating approximately 11,137 CY of flood-deposited sediment and debris to reestablish and widen the channel, lay back banks and create floodplain features; 2) placing and reusing excavated material at designated locations for other purposes on the site; 3) constructing in-stream channel grade control structures based on natural boulder analogs; and 4) bank reconstruction including installation of biotechnical stabilization measures (i.e. vegetated soil lifts, vegetated rock slope, and willow brush mats); and 5) revegetation of disturbed slopes and steepened banks.

Existing structures, ad hoc construction debris and other deleterious materials encountered within the creek channel would be removed. Existing structures and materials include approximately 200 linear feet of failed retaining wall (multiple sections), concrete and asphalt rubble, buried fire and flood damaged materials, and old tires (used as creek bank revetment). In addition, miscellaneous abandoned storm drains and drain inlets would also be removed from the creek.

The graded creek banks would be laid back to more stable profiles ranging from 2:1 to 6:1 (horizontal:vertical) slopes, except where space limitations require a steeper slope. Depending on site specific conditions, the creek banks will be stabilized using a mix of biotechnical bank stabilization measures, erosion control fabric and seeding and revegetation with native trees and plants. Bank stabilization measures will be analyzed and confirmed based on hydraulic conditions and geomorphic setting. Biotechnical bank stabilization measures would be employed in areas where banks are 2:1 or steeper and in bank reconstruction areas. In areas where toe scour and/or active erosion has been identified selective grading will be combined with vegetated rock riprap protection in lower bank zones to protect against future erosion and bank failure. In many segments of the channel the

vegetated rock riprap will replace existing and failing bank protection (grouted rock walls, tire revetments, etc.) that are not functioning as intended and do not provide habitat value.

Creek restoration will require equipment to access the channel to effectively complete the sediment removal, channel and bank grading and construction of channel and bank stabilization structures. Construction equipment includes tracked excavators, small bulldozers, rubber-tired loaders, and dump trucks. A temporary dewatering and water control plan will be implemented to support in-channel construction activities when water is present. An estimated 8,436 willow and cottonwood cuttings are anticipated to be planted as part of the creek restoration efforts.

ESHA Impacts[8]

Compensatory Mitigation Ratios will be provided to be consistent with CZO Section 8178-2.10.6

Baseline ESHA mitigation ratios[9] are based on the type of ESHA being removed or degraded:

2:1 Baseline Ratio: Coastal sage scrub or chaparral, except when occupied by federal or state endangered or threatened species.
4:1 Baseline Ratio: Wetland, estuary, lagoon, or lakes.
3:1 Baseline Ratio: All other ESHA types, including wet environments not listed above, and habitat occupied by federal, or state endangered or threatened species.

Table 6

ESHA and Sensitive Plant Communities- New Permanent Impacts to Previously Undisturbed Areas

	Impacts in acres	Required Mitigation in acres
Fuel Modification	2.299	6.891 (3:1)
Building, Structures and Grading	0.235	0.705 (3:1)
Concrete, Asphalt and Pathways	0.224	0.672 (3:1)
Total	2.758	8.274

Table 7

[8] ISBA (Attachment F); ESHA impacts describe where buildings, structures, grading, concrete, asphalt, and paths, extend into new areas previously undisturbed, including fuel modification.
[9] CZO Sec. 8178-2.10.6 – Compensatory Mitigation Ratios.

ESHA and Sensitive Plant Communities – New Temporary Impacts to Previously Undisturbed Areas

	Impact in acres	Required Mitigation in acres
Habitat and Creek Restoration	4.52	4.52 (1:1)
Building, Structures and Grading	0.388	0.388 (1:1)
Utilities	0.116	0.116 (1:1)
Total	5.026	5.026

Table 8

Sensitive Plant Communities – Impacts within Baseline Footprint (ISBA Table 4-8)

	Impact in acres	Required Mitigation in acres
Fuel Modification	8.492	0
Building, Structures and Grading	2.491	0
Utilities	0.052	0
Concrete, Asphalt and Pathways	2.447	0
Total	13.482	0

Table 9

Little Sycamore Creek: Permanent Impacts to Waters and Wetlands (ISBA Table 4-9)[10]

	Impacts in acres	Required Mitigation in acres[11]
USACE Non-Wetland Waters of the United States – Grading/Structures/ Utilities/ Fuel Modification	0.03	TBD
RWQCB Waters of the State - Grading/Structures/ Utilities/ Fuel Modification	0.05+	TBD
CDFW Jurisdictional Waters and Habitat - Grading/Structures/ Utilities/ Fuel Modification	0.22+	TBD

[10] Impacts associated with vegetated rock riprap, wingwalls for storm drain outlets, and grade control structures within Little Sycamore Creek.

[11] Ventura County General Plan Policy COS-1.9, Agency Consultation Regrading Biological Resources, requires the County to consult with resource agencies during discretionary review. On site consultation with California Department of Fish and Wildlife, Army Corps of Enginneers and US Fish and Wildlife was conducted on November 20, 2021.This consultation will take place again, prior to project approval.

CCC Single-Parameter Wetlands - Grading/Structures/ Utilities/ Fuel Modification	0.21	TBD

Table 10

Little Sycamore Creek: Temporary Impacts to Waters and Wetlands (ISBA Table 4-10)

	Impacts in acres	Required Mitigation in acres
USACE Non-Wetland Waters of the United States – Habitat and Creek Restoration	0.82	TBD
USACE Non-Wetland Waters of the United States- Grading/Structures/Utilities	0.12	TBD
RWQCB Waters of the State- Habitat and Creek Restoration	1.29	TBD
RWQCB Waters of the State – Grading/Structures/Utilities	0.11+	TBD
CDFW Jurisdictional Waters and Habitat- Habitat and Creek Restoration	3.11	TBD
CDFW Jurisdictional Waters and Habitat- Grading/Structures/Utilities	0.40+	TBD
CCC Single-Parameter Wetlands - Habitat and Creek Restoration	2.34	TBD
CCC Single-Parameter Wetlands - Grading/Structures/Utilities	0.23	TBD
Total:	8.93	TBD

Impact to Mitigation ratios for Federal and State jurisdictional areas to be determined and incorporated into the Final ESHA Mitigation Plan.[12]

Tree Removal

[12] Refer to Section 4D, Ecological Communities – ESHA, Mitigation Measure (MM) BIO-17.

A total of 389 trees will be impacted by the project of which 184 would be removed. A total of 102 trees will be removed because they are in poor health, damaged, dead, or pose a safety threat to campers and 88 protected trees will be removed for proposed development, protected trees are described below:

19 Non-heritage/Non-ESHA trees will be removed, and 190 trees will be planted (mitigated at 10:1 ratio)

- 19 Native trees (Coast Live Oak, Wester Sycamore and Modesto Ash)

Two Heritage ESHA trees will be removed, and 11trees will be planted (mitigated at 10:1 ratio)

- 1 Native trees (California Black Walnut T263)
- 1 Nonnative trees (Eucalyptus T307)

16 Heritage non-ESHA Trees will be removed, and 61 trees will be planted (mitigated at 1:1 ratio)[13]

- 5 Native trees (Wester Sycamore)
- 11 Nonnative trees (Aleppo Pine)

51 ESHA trees will be removed, and 159 trees will be planted (mitigated at 10:1 ratio)

- 12 Native trees (Coast Live Oak, Western Sycamore)
- 39 Nonnative trees (Eucalyptus, Mousehole Tree)

Tree Encroachment

Proposed development will encroach onto the Tree Protection Zones (TPZ) of 199 trees of which only 172 are considered protected trees.

44 Non-Heritage/Non-ESHA trees subject to encroachment:

	Trees	Mitigation
Less than 10% encroachment	5 natives	None
Between 10-30% encroachment	12 11 natives 1 non-native	55 native trees (5:1)
Greater than 30% encroachment	27 natives	270 native trees (10:1)

[13] Replacement trees to be native (CZO Section 8178-7.6.1)

15 Heritage ESHA trees subject to encroachment:

	Trees	Mitigation
Less than 10% encroachment	3 2 natives 1 non-native	2 Natives No mitigation required
Between 10-30% encroachment	5 5 natives	25 native trees (5:1)
Greater than 30% encroachment	7 5 natives 2 non-natives	50 Natives (10:1) 2 Non Natives(1:1)

42 Heritage non-ESHA trees subject to encroachment:

	Trees	Mitigation
Less than 10% encroachment	2 2 natives	None
Between 10-30% encroachment	7 7 natives	35 Native trees (5:1)
Greater than 30% encroachment	30 30 natives	300 Native Trees (10:1)

76 ESHA trees will be subject to encroachment:

	Trees	Mitigation
Less than 10% encroachment	15 6 natives 9 non-natives	None
Between 10-30% encroachment	25 7 natives 18 non-natives	35 native trees (5:1)
Greater than 30% encroachment	34 7 natives 27 non-natives	70 native trees (10:1)

Construction Staging and Storage Areas

Construction personnel would access the project site via Gate 1 to the extent feasible. Access via Gates 2, 3, and 4 will be necessary from time-to-time depending on the phase of construction or construction methods. Parking, staging and storage areas would be located at Glitch Field for Lower and Middle Camp and Upper Camp Field for Upper Camp. All staging and storage areas will be designated in previously disturbed areas with construction BMPs.

7. List of Responsible and Trustee Agencies: California Department of Fish and Wildlife

8. **Methodology for Evaluating Cumulative Impacts:** Pursuant to the CEQA Guidelines [§ 15064 (h) (1)], this Initial Study evaluates the cumulative impacts of the project using the list approach, by considering the incremental effects of the proposed project in connection with the effects of past, current, and probable future projects.

For a full list of the past, current, and probable future projects within the unincorporated area of Ventura County that were included in the analysis, please refer to the List and Map of Ventura County Pending and Approved Projects used in the cumulative impacts analysis, included as Attachment G. Although all of the projects were considered in the analysis of cumulative impacts, the analysis focused on the following within the unincorporated area of Ventura County, due to their proximity to the project site and potential to contribute to environmental impacts to which the proposed project may also contribute.

Table 1 – Unincorporated Ventura County Pending and Recently Approved Projects Within 5-Mile Radius

Case No.	Status	Description
PL16-0006	Pending	Coastal Planned Development (PD) Permit to drill an exploratory water well and Parcel Map Waiver-Lot Line Adjustment. No development is proposed on the project site. If the new water well is determined to be adequate in quantity and quality, the LLA would proceed with the additional submittal of two residences (one for each resulting lot).
PL17-0088	Pending	Coastal PD Permit to construct a new swimming pool and, pool cabana.
PL20-0091	Approved	The Project is a Minor Modification to CUP 3790 for the continued use (10 years) of an existing animal compound referred to as Exotic Animals.
PL21-0048	Pending	Coastal PD Permit to construct a new 2,128 sq. ft. single-family dwelling and 960 sq. ft. garage, with accessory site improvements (septic system, driveway, site landscaping). The project includes mitigation for ESHA removal.
PL22-0004	Pending	Coastal PD Permit for after the fact permitting of a 995 sq. ft. accessory dwelling unit and a 690 sq. ft. covered patio at the site of an existing single-family dwelling.
PL22-0112	Pending	Minor Modification to Coastal PD Permit No. LU06-0088 to construct a new 1,237 sq. ft. garage, an 844

		sq. ft. storage building and a completion of an access road at the site of an existing residence.
PL22-0151	Approved	Major Modification to Planned Development Permit 1576 to add a new 2000 sf Storage Structure to be situated on the hillside between the existing Main Residence and existing Accesory Dwelling Unit.
PL23-0066	Pending	Site Plan Adjustment to Coastal PD Permit PL16-0004 for the approval of an existing structure to be used as an accessory dwelling unit (700 sq. ft.) and 589 square foot utility building and garage, after-the-fact authorization of unpermitted structures and improvements including two 5,000-gallon water tanks, a 108 sf well house, and east detention basin (58,374 sf), and restoration of 1.34 acres of Environmentally Sensitive Habitat Areas (ESHA), the construction of a 15,741 sq. ft. three-level single-family dwelling and a 1,173 sq. ft. garage, and the installation of a 60 foot by 30 foot pickleball court.
PL23-0146	Approved	Site Plan Adjustment to Coastal PD Permit No. PL18-0113 to modify Condition Nos. 17 (Restoration of Environmentally Sensitive Habitat Area [ESHA]) and 18 (Compensatory Mitigation for Impacts on Environmentally Sensitive Habitat Area [ESHA] Through Off-Site Preservation). This condition calls for on-site restoration of 2.93 acres of ESHA to mitigate for ESHA removal that occurred in the past without permits.
PL24-0013	Approved	Coastal PD Permit for the construction of a new single-family residence consisting of 12,637 sf of enclosed and covered areas including the garage/carport on Lot No. 4, Tract No. 5457.
PL24-0045	Approved	Site Plan Adjustment to change in the type of roof material for the single family dwelling and the accessory storage structure (i.e., the music room) approved under Coastal PD Permit LU05-0169 from a clay tile roof to a metal roof galvanized with a low gloss, non-metallic Galvalume material coating.
PL24-0048	Pending	Coastal Planned Development permit for the Demolition of an existing house, construction of a new house, new driveway, new fire truck turn-around, new water tank, new septic system and grading remediation.

Section B – Initial Study Checklist and Discussion of Responses[14]

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
RESOURCES:								
1. Air Quality (VCAPCD)								
Will the proposed project:								
a) Exceed any of the thresholds set forth in the air quality assessment guidelines as adopted and periodically updated by the Ventura County Air Pollution Control District (VCAPCD), or be inconsistent with the Air Quality Management Plan?	X				X			
b) Be consistent with the applicable General Plan Goals and Policies for Item 1 of the Initial Study Assessment Guidelines?		X				X		

Impact Discussion:

1a. The project will have no impact on regional air quality impacts due to the project having an existing operation (campgrounds) that were destroyed during a recent wildfire. The proposed project does not include an increase in operations, employees, population, or third-party event frequency. In addition, the proposed buildings and structures to be constructed will have to comply with new regulations for energy, such as Title 24, water, and wastewater (and the use of recycled water for irrigation), and electricity providers that have more renewable sources in their portfolio. These new utilities combined will decrease the project's emissions as compared to baseline (Camp Hess Kramer pre-wildfire destruction) and may result in an air quality net benefit.

1b. The project will have less than significant impacts due to the construction operations that may generate fugitive dust. Although construction emissions are not part of determining significance determination for Regional Air Quality, due to their temporary short-term nature, APCD will recommend updating the existing condition in permit LU10-0069 (Condition no. 51) to reflect project and due to lengthy construction length and grading involved.

[14] The threshold criteria in this Initial Study are derived from the *Ventura County Initial Study Assessment Guidelines* (April 26, 2011). For additional information on the threshold criteria (e.g., definitions of issues and technical terms, and the methodology for analyzing each impact), please see the *Ventura County Initial Study Assessment Guidelines*.

Mitigation/Residual Impact(s): None

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
2A. Water Resources – Groundwater Quantity (WPD)								
Will the proposed project:								
1) Directly or indirectly decrease, either individually or cumulatively, the net quantity of groundwater in a groundwater basin that is overdrafted or create an overdrafted groundwater basin?	X				X			
2) In groundwater basins that are not overdrafted, or are not in hydrologic continuity with an overdrafted basin, result in net groundwater extraction that will individually or cumulatively cause overdrafted basin(s)?	X				X			
3) In areas where the groundwater basin and/or hydrologic unit condition is not well known or documented and there is evidence of overdraft based upon declining water levels in a well or wells, propose any net increase in groundwater extraction from that groundwater basin and/or hydrologic unit?		X				X		
4) Regardless of items 1-3 above, result in 1.0 acre-feet, or less, of net annual increase in groundwater extraction?		X				X		
5) Be consistent with the applicable General Plan Goals and Policies for Item 2A of the Initial Study Assessment Guidelines?		X				X		

Impact Discussion:

2A-1.-2A-2 The proposed project does not overlie an over-drafted groundwater basin, a non-overdrafted basin or hydrologic unit.

2A-3. - 2A-4. The proposed project is within the Little Sycamore Canyon Hydrologic Subarea but does not overlie a known, documented or Department of Water Resources

(DWR) designated groundwater basin. There are five active wells (State Well Nos. 01S20W22P08S, 01S20W22L04S, 01S20W22P03S, 01S20W22P07S, and 01S20W22L02S) within the proposed project boundaries. These wells are owned and operated by the Yerba Buena Water Company (YBWC).

Stantec Consulting Services, Inc. (Stantec) provided a technical memo titled Preliminary Water System Design, dated May 1, 2021 (Attachment C-2). The memo provides an analysis for the distribution system for domestic, irrigation and fire water. The memo and its calculations assume all supply lines, distribution lines, valves, and appurtenances will be of new construction. Tanks used for domestic and fire water storage are in acceptable condition and will be inspected to ensure they meet current codes and standards. Yerba Buena Water Company (YBWC) will supply water for the system (Attachment C-3). Appendix 2 of the Preliminary Water System Design (Attachment C-2) is a technical memo from Stantec titled Preliminary Average and Maximum Day Demands and On-site Storage Calculations, dated May 1, 2021. The memo provides an estimated domestic water system and fire flow demand, estimated irrigation demand and domestic and fire water storage requirements calculated per guidelines from the Ventura County Water Works Manual (VCWWM). Per the second submittal cover letter provided by Stantec Consulting Services, Inc. dated April 8, 2022 the Preliminary Water System Design Memo remains unchanged. There are four domestic and one irrigation service meter connections from YBWC to the Camp. The applicant provided historical site water usage from data collected every two months by YBWC from 2009 to the present for each of the five service meters. Post Woolsey Fire data (2019-2020) is not included in the data, as it does not reflect full occupancy water usage. California Code of Regulations Title 22 requires the maximum monthly historical usage be used for water usage estimating purposes. The maximum estimated total domestic water usage based upon historical demand (maximum bi-monthly usage for Sept. & Oct. 2018) is 3,696,466 gallons or 68.064 acre-feet per year (AFY). The proposed project will not be increasing the population allowed at the camp per the existing CUP. The largest estimated 24-hour daily irrigation water cycle is 16,207 gallons or 18.154-AFY. Based upon the proposed onsite structures and enclosed building volumes, the technical memo calculated that the total required domestic, irrigation and fire water storage volumes for the site is 121,456 gallons. Based upon the technical memo presented in Appendix 2 of the Preliminary Water System Design (Attachment C-2) and estimated calculations presented in Appendices C, D and E of the Design memo (calculated September 14, 2020, by Stantec), the proposed project will consume a total annual volume of 86.591-AFY.

A Water Availability Letter from YBWC, dated April 7, 2010, stated that the site is located within its service area and is a customer of YBWC. YBWC provided a Will Serve Letter dated April 18, 2022 (Attachment C-3) and stated that they will supply water to Camp Hess Kramer, Inc. for the subject property via the 5 existing service meters, limited to 10,621,000 gallons per calendar year (32.595-AFY).

The applicant's consultants met with the County on May 11, 2022, to discuss the water system volume calculations in the May 1, 2021, Preliminary Water System Design (Attachment C-2) as it pertains to the annual quantity of water available from YBWC.

Stantec prepared and provided a Stantec Total Annual Water Usage technical memo dated June 17, 2022 (Attachment C-4) outlining the total estimated annual water usage for the proposed project and differentiated the annual water usage from the daily demands in the Storage memo (Attachment C-2). The estimated annual domestic, irrigation and produced recycled water were calculated to a total annual usage of 32.60-AFY, from which YBWC based their annual allocation for the site in the April 18, 2022, Will Serve Letter. The Total Annual Water Usage memo also proposed a water use monitoring program and recommended water use reduction measures to be implemented to reduce and limit future water use exceedances. The proposed project reportedly will most likely not result in an increase of 1.0 acre-feet or more of net annual groundwater extraction, and proposed mitigations and measures to reduce potential exceedances of the site annual water allocation.

2A-5. The proposed project will be consistent with the applicable General Plan Goals and Policies for Item 2A of the Initial Study Assessment Guidelines and is considered less than significant impact to groundwater quantity.

Mitigation/Residual Impact(s): None

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
2B. Water Resources - Groundwater Quality (WPD)								
Will the proposed project:								
1) Individually or cumulatively degrade the quality of groundwater and cause groundwater to exceed groundwater quality objectives set by the Basin Plan?		X				X		
2) Cause the quality of groundwater to fail to meet the groundwater quality objectives set by the Basin Plan?		X				X		
3) Propose the use of groundwater in any capacity and be located within two miles of the boundary of a former or current test site for rocket engines?	X				X			
4) Be consistent with the applicable General Plan Goals and Policies for Item 2B of the Initial Study Assessment Guidelines?		X				X		

Impact Discussion:

2B-1. Proposed improvements for the Lower and Middle Camps will include sewer lateral extensions from the existing wastewater conveyance system to proposed buildings and will include oil and grease interceptors from the new kitchen facilities prior to discharging into the conveyance system. The proposed improvements will protect-in-place and utilize all four existing sewer lift stations and four existing underground primary treatment tanks and an Onsite Wastewater Treatment System (OWTS), located at the south end of the Camp. Wastewater treatment and discharge requirements are regulated by permit Order No. R4-2013-0079 from the Los Angeles Regional Water Quality Control Board (LARWQCB). The effluent system utilizes pumps that alternate, and discharge treated effluent into two seepage pit clusters with multiple seepage pits. Each seepage pit is 6-feet in diameter with an approximate depth of 30 feet. One cluster is made up of ten seepage pits, located near the treatment facility. The other cluster is made up of 17 pits and located on the west side of the camp approximately 50 feet higher in elevation than the treatment facility. The improvement plan will not be changing the population at the Camp, therefore the existing OWTS will continue to be used for treatment and disposal.

The Upper Camp will utilize sewer lateral extensions to the proposed buildings and connect to the existing onsite septic systems, which includes six septic tanks (from 1,200 to 4,500-gallons) and associated leach fields. The six onsite septic systems are currently subject to “General Waste Discharge Requirements for Small Commercial and Multifamily Residential Subsurface Sewage Disposal Systems,” Order No. 01-031 and Monitoring and Reporting Program No. 9304, adopted by the Los Angeles Regional Water Quality Control Board on February 22, 2001. The development will not be increasing the population at Upper Camp.

Tertiary treated wastewater effluent from the onsite wastewater treatment system is proposed to supplement the irrigation system with recycled water in the Lower Camp. All irrigation facilities using recycled water for supply are required to follow California Code of Regulations Title 22, to be verified based on final design. During extended rainy periods, the existing seepage pits will be utilized for excess recycled water disposal.
State Well Numbers (SWNs) 01S20W22P03S, -P07S, and -P08S, -L02S, and -L04S are active, municipal wells located within the project parcels boundaries and operated by the Yerba Buena Water Company. SWNs 01S20W22P04S (municipal) and 01S20W22M01S (domestic) are destroyed wells located within the project parcel boundaries. County records indicate that SWNs 01S20W22P01S, -P05S, and -P06S are abandoned, municipal wells that cannot be located, and are located within the site parcel boundaries. If the wells (SWNs 01S20W22P01S, -P05S and/or -P06S) are located during construction activities, and to comply with Ventura County Ordinance 4468, Section 4819, the applicant shall obtain a well destruction permit from the Ventura County Public Works Agency and destroy the wells.

The project will most likely not cause the quality of groundwater to fail to meet the groundwater quality objectives set by the Basin Plan because there is no proposed effluent discharge related to project activities.

2B-2. The proposed project will not have the potential to impact the quality of groundwater and cause it to fail to meet the groundwater quality objectives set by the Basin Plan because there is no proposed effluent discharge related to project activities.

2B-3. The project site is not located within two miles of the boundary of a former or current test site for rocket engines.

2B-4. The proposed project, as planned, should be consistent with the applicable General Plan Goals and Policies for Item 2B of the Initial Study Assessment Guidelines and is considered less than significant.

Mitigation/Residual Impact(s): None

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
2C. Water Resources - Surface Water Quantity (WPD)								
Will the proposed project:								
1) Increase surface water consumptive use (demand), either individually or cumulatively, in a fully appropriated stream reach as designated by SWRCB or where unappropriated surface water is unavailable?	X				X			
2) Increase surface water consumptive use (demand) including but not limited to diversion or dewatering downstream reaches, either individually or cumulatively, resulting in an adverse impact to one or more of the beneficial uses listed in the Basin Plan?	X				X			
3) Be consistent with the applicable General Plan Goals and Policies for Item 2C of the Initial Study Assessment Guidelines?	X				X			

Impact Discussion:

2C-1. - 2C-2. Little Sycamore Creek runs from north to south through the eastern portion of the site. Surface water is not proposed to be used for this project.

2C-3. The proposed project will be consistent with the applicable General Plan Goals and Policies for Item 2C of the Initial Study Assessment Guidelines and is considered less than significant to surface water quantity.

Mitigation/Residual Impact(s): None

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
2D. Water Resources - Surface Water Quality (WPD)								
Will the proposed project:								
1) Individually or cumulatively degrade the quality of surface water causing it to exceed water quality objectives as contained in Chapter 3 of the three Basin Plans?			X				X	
2) Directly or indirectly cause storm water quality to exceed water quality objectives or standards in the applicable MS4 Permit or any other NPDES Permits?		X				X		
3) Be consistent with the applicable General Plan Goals and Policies for Item 2D of the Initial Study Assessment Guidelines?		X				X		

Impact Discussion:

2D-1. The project is not located within the unincorporated urban area of Ventura County but is located within a high-risk area.

Increased new development and urbanization is typically addressed through the Part 4.E., "Planning and Land Development Program" of the Ventura Countywide NPDES Municipal Stormwater Permit No. CAS004002, but the proposed project is not subject to these requirements, because it's outside of the County's MS4 jurisdiction. The proposed project development area consists of approximately 58.9 acres and currently contains 7.8 acres of impervious surface area. The proposed new/replaced impervious area is 5.7 acres thus creating a total impervious area of 13.6 acres. Due to the large amount of impervious area, the future development and increased impervious surface area has an individual and cumulative potential to exceed the threshold for significance related to the water quality objectives of the Los Angeles Region Basin Plan and is expected to have Potentially Significant Impact (PSM) on surface water quality objectives due to impervious surfaces proposed. Incorporation of the following County Stormwater Program - M1

mitigation measure will ensure individual and cumulative impacts to existing impaired downstream waterbodies and water quality objectives will be avoided.

2D-2. Appropriate erosion and sediment control BMPs will need to be established during construction in accordance with the Ventura Countywide MS4 Permit. The project includes greater than one acre of land disturbance and will need to obtain coverage under the State Construction General Permit.

The proposed project will not directly or indirectly cause stormwater quality to exceed water quality objectives or standards in the applicable MS4 Permit or any other NPDES Permits. In accordance with the Ventura Countywide Municipal Stormwater NPDES Permit CAS004002, "Development Construction Program" Subpart 4.F, the applicant will be required to include Best Management Practices (BMPs) designed to ensure compliance and implementation of an effective combination of erosion and sediment control measures during any construction and/or soil disturbance activities for one of the following classifications: SW-2 form (Best Management Practices for Construction One Acre and Larger), and SW-HR form (Best Management Practices for Construction at High Risk Sites). Additionally, the proposed construction activities are subject to coverage under the NPDES General Construction Permit (No. CAS000002).

As such, neither the individual project nor the cumulative threshold for significance would be exceeded and the project is expected to have a Less than Significant (LS) impact related to water quality objectives or standards in the applicable MS4 Permit or any other NPDES Permits

2D-3. The proposed project is consistent with the applicable General Plan Goals and Policies for ISAG Item 2d.

Mitigation/Residual Impact(s)

Mitigation Measure County Stormwater Program (CSP) - M1
Purpose: To ensure runoff from new impervious surfaces does not contribute pollutants or degrade the water quality of downstream surface waters resulting in further exceedances of water quality objectives contained in the Los Angeles Region Basin Plan.

Requirement: The Permittee shall prepare a post-construction stormwater management plan (PCSMP) to retain/treat runoff from the new impervious surface, a maintenance plan, and annual verification of ongoing maintenance.

Documentation: The Permittee shall submit the following items to the Public Works Agency-County Stormwater Program (CSP):

1. A drainage study or a water quality design report, prepared and stamped by a California-licensed civil engineer, that addresses the following items to meet the Ventura County Technical Guidance Manual for Stormwater Quality Control

Measures, 2018 Errata Update (TGM), or as amended, requirements for post-construction control measure design, to the maximum extent practicable:

- Project location, project description, including indication of the purpose of the facility and if the project is new development, as defined by the TGM;
- Disturbed area for construction; Amount of existing impervious surface, as defined by the TGM, and proposed impervious surface to be created/added/replaced; Average existing slopes on-site to be graded; PCSMP output from the applicable sections of the TGM Tool; and
- Post-construction control measure sizing calculations.

2. A complete site plan, prepared and stamped by a California-licensed civil engineer or land surveyor, that accurately delineates drainage areas, ESA's, open space preservation areas, impervious areas, natural hydrologic features, locations of discharges, topography, potential pollutant areas, and the location and types of post-construction control measures. In addition, applicable post-construction control measure details and a drawing detail verifying that the installation of the PCSMP will meet performance criteria defined in the TGM, to the maximum extent practicable, prepared and stamped by a California-licensed civil engineer or architect.

3. A geotechnical report, prepared and stamped by a California-licensed geotechnical engineer or geologist, including infiltration testing results or technical infeasibility analysis, as defined in the TGM.

4. A maintenance plan (i.e., Exhibit C template, available at https://www.onestoppermits.vcrma.org/departments/stormwater-program) prepared in accordance with Section 7 and Appendix I of the TGM. The plan shall at a minimum include the following:

   - The location of each device; The maintenance processes and procedures necessary to provide for continued operation and optimum performance.
   - A timeline for all maintenance activities; and any technical information that may be applicable to ensure the proper functionality of the device(s).

5. A maintenance agreement, signed by the property owner, including a signed statement accepting responsibility for maintenance of the PCSMP control(s). The statement must include written verification that all PCSMP controls will be properly maintained. At a minimum, this statement shall include the following:

   - Written conditions in the sales or lease agreement, which require the property owner or tenant to assume responsibility for the PCSMP control maintenance and annual inspection; Written text in project covenants, conditions, and restrictions (“CCRs”) to the applicable homeowner’s association; or Any other

legally enforceable agreement or mechanism that assigns PCSMP maintenance responsibility.

6. Completed and signed Annual Maintenance Verification Report

Timing: Items above shall be submitted to the CSP for review/approval prior to issuance of a Zoning Clearance for grading. Annual Maintenance due Sept 15.

Monitoring and Reporting: The CSP will review the submitted materials for consistency with the Permit. Grading permit inspectors will conduct inspections during construction to ensure effective installation of the required BMPs.

After implementation of mitigation measure CSP-M1, impacts to surface water quality objectives will be less than significant.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
3A. Mineral Resources – Aggregate (Plng.)								
Will the proposed project:								
1) Be located on or immediately adjacent to land zoned Mineral Resource Protection (MRP) overlay zone, or adjacent to a principal access road for a site that is the subject of an existing aggregate Conditional Use Permit (CUP), and have the potential to hamper or preclude extraction of or access to the aggregate resources?	X				X			
2) Have a cumulative impact on aggregate resources if, when considered with other pending and recently approved projects in the area, the project hampers or precludes extraction or access to identified resources?					X			
3) Be consistent with the applicable General Plan Goals and Policies for Item 3A of the Initial Study Assessment Guidelines?	X				X			

Impact Discussion:

3A-1 and 3A-2. The project site is not located within the MRP overlay zone, located on or adjacent to land classified as MRZ-2 and the project site is not located adjacent to a road used as a principal means of access to an existing CUP for aggregate extraction.

The project will have no impact on extraction of aggregate resources and no impact on access to aggregate resources and will not make a cumulatively considerable contribution to a significant cumulative impact to extraction of or access to aggregate resources.

3A-3. The proposed project is consistent with applicable Ventura County General Plan Goals and Policies and the Coastal Area Plan for Item 3a of the Ventura County Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): None

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
3B. Mineral Resources – Petroleum (Plng.)								
Will the proposed project:								
1) Be located on or immediately adjacent to any known petroleum resource area, or adjacent to a principal access road for a site that is the subject of an existing petroleum CUP, and have the potential to hamper or preclude access to petroleum resources?	X				X			
2) Be consistent with the applicable General Plan Goals and Policies for Item 3B of the Initial Study Assessment Guidelines?	X				X			

Impact Discussion:

3B-1. The project site is not located or immediately adjacent to any known petroleum resource area, or adjacent to a principal access road to an existing petroleum CUP. The project does not have the potential to hamper or preclude access to petroleum resources. The project would not cause a significant impact on the extraction of oil resources or access to oil resources.

3B-2. The proposed project is consistent with the applicable Ventura County General Plan Goals and Policies for Item 3b of the Ventura County Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): None

Section No. 4 Biological Resources of this Initial Study has been prepared based on the following biological resource technical documents prepared by Stantec.

- Ventura County Initial Study Biological Assessment (ISBA), November 27, 2023 (Attachment F)
- Arborist's Report, July 10, 2023, updated September 26, 2023.
- Monarch Butterfly Surveys – Camp Hess Kramer Memorandum, February 13, 2024

Refer to the project ISBA for a discussion of methods and existing biological resource conditions within the biological Survey Area. The Survey Area, or physical area that was evaluated for biological resources for environmental review, included the approximate 187-acre project site consisting of the subject properties as well as a 500-foot buffer, where accessible. The Survey Area as well as the tree survey area for the Arborist's Report are shown on Figure 7 in the ISBA. The project footprint including all project components are shown on Figures 2-1 through 2-4 in the ISBA.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
4. Biological Resources								
4A. Species								
Will the proposed project, directly or indirectly:								
1) Impact one or more plant species by reducing the species' population, reducing the species' habitat, fragmenting its habitat, or restricting its reproductive capacity?			X			X		
2) Impact one or more animal species by reducing the species' population, reducing the species' habitat, fragmenting its habitat, or restricting its reproductive capacity?			X			X		

Impact Discussion:

4A-1. *Impact one or more plant species by reducing the species' population, reducing the species' habitat, fragmenting its habitat, or restricting its reproductive capacity?*

The project was evaluated for substantial adverse effects on special-status plant species. Special-status plants included plants that are:

- Listed, proposed for listing, or candidates for listing as Threatened or Endangered under the Federal Endangered Species Act (FESA);
- Listed or proposed for listing as Threatened or Endangered under the California Endangered Species Act (CESA);

- Listed as Rare under the Native Plant Protection Act;
- Included on the California Native Plant Society (CNPS) Inventory of Rare and Endangered Vascular Plants with a California Rare Plant Rank (CRPR) 1A, 1B, 2A, 2B, 3, or 4;
- Included on Ventura County's Locally Important Plant list.

The status codes for special-status plants are described in **Table 4-1, Status Codes for Special-Status Plants.**

Table 4-1
Status Codes for Special-Status Plants

FEDERALLY PROTECTED SPECIES	
FE (Federal Endangered)	A species that is in danger of extinction throughout all or a significant portion of its range.
FT (Federal Threatened)	A species that is likely to become Endangered in the foreseeable future.
FC (Federal Candidate)	A species for which USFWS has sufficient information on its biological status and threats to propose it as Endangered or Threatened under the Endangered Species Act (ESA), but for which development of a proposed listing regulation is precluded by other higher priority listing activities.
STATE PROTECTED SPECIES	
SE (California Endangered)	A native species or subspecies which is in serious danger of becoming extinct throughout all, or a significant portion, of its range due to one or more causes, including loss of habitat, change in habitat, overexploitation, predation, competition, or disease.
ST (California Threatened)	A native species or subspecies that, although not presently threatened with extinction, is likely to become an Endangered species in the foreseeable future in the absence of the special protection and management efforts required by this chapter. Any animal determined by the commission as "Rare" on or before January 1, 1985, is a "Threatened species."
SR (California Rare)	A species, subspecies, or variety of plant is rare under the Native Plant Protection Act when, although not presently threatened with extinction, it is in such small numbers throughout its range that it may become Endangered if its present environment worsens. Animals are no longer listed as Rare; all animals listed as Rare before 1985 have been listed as threatened.
CALIFORNIA RARE PLANT RANK (CRPR)	
CRPR 1A	Plants presumed extirpated in California and either rare or extinct elsewhere.
CRPR 1B	Plants rare, threatened, or endangered in California and elsewhere.
CRPR 2A	Plants presumed extirpated in California, but more common elsewhere.
CRPR 2B	Plants rare, threatened, or endangered in California, but more common elsewhere.
CRPR 3	A review list for plants for which there is inadequate information to assign them to one of the other lists or to reject them.
CRPR 4	A watch list for plants that are of limited distribution in California.
CALIFORNIA NATIVE PLANT SOCIETY (CNPS) THREAT RANK	
The CNPS Threat Rank is an extension added onto the CRPR and designates the level of endangerment, as follows: • 0.1-Seriously threatened in California (over 80% of occurrences threatened / high degree and immediacy of threat)	

• 0.2-Fairly threatened in California (20-80% occurrences threatened / moderate degree and immediacy of threat) • 0.3-Not very threatened in California (<20% of occurrences threatened / low degree and immediacy of threat or no current threats known)	
LOCALLY IMPORTANT SPECIES	
VC LIS	Ventura County Locally Important Plant Species

Stantec conducted a literature review to determine whether special-status plant species are documented within or in the vicinity of the project site. One (1) rare plant species is reported by the California Natural Diversity Database (CNDDB) to occur within or in the vicinity of the project site, Blochman's dudleya (*Dudleya blochmaniae* ssp. *blochmaniae*) [CRPR 1B.1]. The CNDDB provides a location for this occurrence, accurate to within 1/5 mile, which intersects the northeastern part of the project site including the Middle Camp and vicinity. The general location of the occurrence as reported by the CNDDB is shown on Figure 5.3 in the ISBA.

Reconnaissance-level surveys were then conducted in 2020, 2021 and 2022 to identify habitat that could potentially support special-status plant species. The potential for special-status plant species to occur was evaluated based on the field observations of habitat and other site conditions, information available in standard biological references, and local knowledge of the surveying biologists. The potential for occurrence analysis is provided in Section 3.2 of the ISBA. Nine special-status plant species were determined to have moderate potential to occur, while the remaining species had low or no potential to occur. The following species were determined to have moderate potential to occur within the Survey Area.

- Blochman's dudleya (*Dudleya blochmaniae* ssp. *blochmaniae*) [CRPR 1B.1]
- Braunton's milk-vetch (*Astragalus brauntonii*) [FE, CRPR 1B.1]
- Chaparral ragwort (*Senecio aphanactis*) [CRPR 2B.2]
- Grab Hosackia or Lotus (*Acmispon micranthus*) [VC LIS]
- Nuttall snapdragon (*Antirrhinum nuttallianum* ssp. *subsessile*) [VC LIS]
- Ojai navarretia (*Navarretia ojaiensis*) [CRPR 1B.1]
- Plummer's mariposa-lily (*Calochortus plummerae*) [CRPR 4.2]
- San Diego sedge (*Carex spissa*) [VC LIS]
- Santa Susana tarplant (*Deinandra minthornii*) [SR, CRPR 1B.2]

Focused botanical surveys of the Survey Area were conducted by Stantec biologists in May and July 2021. The focused botanical surveys followed the California Native Plant Society's (CNPS) *Botanical Survey Guidelines*, California Department of Fish and Wildlife (CDFW)'s *Protocols for Surveying and Evaluation of Impacts to Special-Status Native Populations and Natural Communities*, and the United States Fish and Wildlife's (USFWS) *General Rare Plant Survey Guidelines*. A list of vascular plant species observed during botanical surveys is provided in Appendix 2 of the ISBA.

No rare, threatened, endangered, or Ventura County Locally Important Plant species were found during the botanical surveys. One (1) special-status CRPR 4 plant, California black walnut (*Juglans californica*), was found at several locations at the site. The locations of California black walnut trees are shown on maps in the Arborist Report. The Arborists Report documents 22 California black walnuts within the survey area; there may be additional California black walnuts within the wider biological Survey Area.

Three California black walnut trees would be removed by the project and the Tree Protection Zones of an additional eight California walnut trees would be encroached upon by the project. These impacts to protected California black walnut trees would be mitigated as necessary pursuant to protected tree policies of the Ventura County CZO, which is addressed under the impacts discussion for County Protected Trees, later in this section. CRPR 4 species are not considered rare but rather are on a "watch-list" of plants that are of limited distribution within California, and the California black walnut is relatively secure in the Santa Monica Mountains region. Furthermore, it is not included on the County's list of Locally Important Plant species. Therefore, from the standpoint of its status as a CRPR 4 plant, project impacts to the special-status California black walnut would be less than significant (**Class III**).

Based on the negative results of the focused botanical surveys, which were conducted following standard protocols at the appropriate times of the year, all other special-status plant species are presumed absent from the site, and other than the California black walnut, construction and operation of the proposed project is not expected to result in direct or indirect impacts to special-status plant species. However, as botanical surveys for the project were last conducted in 2021, and botanical surveys are only considered current by CDFW for two years, a mitigation measure requiring botanical surveys in spring prior to construction is required to ensure project impacts to potentially occurring special-status plant species would be less than significant.

If special-status plants are found at the project site during botanical surveys, potential direct impacts would include removal by grading and other site-preparation activities, crushing from vehicles and heavy equipment, trampling from foot traffic, loss or damage from fuel reduction activities (including trampling, weed-whipping, and vegetation removal), loss of suitable habitat, and loss of seed bank due to soil disturbance. Potential indirect impacts to special-status plants would include fugitive dust, excessive erosion and sediment deposition, and changes in hydrological conditions, all of which can harm plants and plant populations. Also, both construction and operation of the project could result in the introduction and proliferation of non-native invasive plants at the site, which can outcompete special-status plants and degrade habitats supporting special-status plants.

These potential direct and indirect impacts to special-status plant species would be potentially significant, but mitigable. With implementation of mitigation measures BIO-1, BIO-7 through BIO-11, BIO-13 through BIO-18, and BIO-20, impacts to potentially occurring special-status plant species would be reduced to a less than significant level (**Class II**). Mitigation measures BIO-1, BIO-9 through BIO-11, BIO-13 through BIO-18,

and BIO-20, require pre-construction surveys and biological monitoring throughout construction, environmental awareness training for project personnel, implementation of best management practices (BMPs) during the construction phase, focused botanical surveys in the spring prior to construction as well as avoidance or compensation for impacts to special-status plants, and a non-native plant species management plan to prevent the introduction and proliferation of non-native species at the project site.

Protected Trees

The Ventura County CZO Section 8178-7 regulates the alteration and removal of a protected tree, encroachment into a tree protection zone (TPZ), development standards, and mitigation requirements. If a proposed project cannot avoid impacts to Protected Trees, mitigation of these impacts (such as replacement of trees) is addressed through the tree permit process. The following types of trees identified in Section 8178-7.3 of the CZO are considered "Protected Trees" for the purposes of Section 8178-7.

- **Trees that contribute to the function and habitat value of an ESHA.** Any tree that meets one or more of the following criteria is classified as ESHA:
  - The tree is located within any ESHA or is classified as ESHA by a qualified biologist. Non-native, invasive, or invasive watch-list trees shall not be classified as ESHA unless the tree meets the definition of ESHA in Section 8178-2.4.1 of the County CZO.
  - The tree exhibits evidence of supporting a breeding colony, colonial roost (e.g., monarch butterfly overwintering roost), bird nest (for migratory birds), or has been identified as a denning or breeding site, as determined in writing by a qualified biologist or ornithologist, or as determined by the County biologist based on historic or current data.
  - The tree was required to be planted or protected pursuant to an ESHA Mitigation Plan, ESHA Vegetation Management Plan, or Tree Protection, Planting, and Monitoring Plan.
- **Native Trees.** A native tree, which includes but is not limited to the trees listed as Native Trees in Appendix T-1, Table 1 of the County CZO shall be classified as a Protected Tree if it meets one or more of the following criteria:
  - The tree is a minimum of three inches in diameter at 4.5 feet above existing grade.
  - The tree is a multi-trunk tree with two or more trunks forking below four and 4.5 feet above the uphill side of the root crown with two of the trunks having a sum of six inches in diameter.
- **Historic Trees.** Historic trees embody distinguishing characteristics that are inherently valuable and are associated with landscape or land use trends that shaped the social and cultural history of Ventura County. To be considered an historic tree, a tree or group/grove of trees shall be identified by the County as a Cultural Heritage Site, or the tree or group/grove of trees shall be listed in or formally determined eligible for listing in the California Register of Historic Resources and/or National Register of Historic Places. In addition to the foregoing

requirements, a tree must meet one or more of the following criteria to be a historic tree:

- The tree(s) is associated with events or persons that made a significant contribution to the history of Ventura County, California or the nation.
- The tree(s) functions as an important biological, visual, or historic resource within the context of an historic landscape.
- The location of the tree(s) is associated with an historically significant view or setting.

- **Heritage Trees.** Heritage trees are defined as non-native, non-invasive or non-invasive watch list species trees or group/grove of trees with unique value that are considered irreplaceable because of the tree's rarity, distinctive features (e.g. size, form, shape color), or prominent location with a community or landscape. To be considered a heritage tree, a tree (or group/grove of trees) shall meet either of the following criteria:
  - The tree has a single trunk of 28 inches or more in diameter or with multiple trunks, two of which collectively measure 22 inches or more in diameter; or
  - If the tree species has naturally thin trunks when full grown (such as Washington Palms), or trees with unnaturally enlarged trunks due to injury or disease (e.g. burls and galls), the tree must be:
    - at least 60 feet tall; or
    - at least 75 years old, as verified by historical accounts, photographs, or associations with historic structures. Age shall not be determined by growth ring counts in cores taken from the edge to the center of the tree.

Stantec conducted tree surveys in 2020, 2022 and 2023 at the project site. Data collected included tree species, trunk diameter at breast height (DBH), the overall health, structural condition, and the potential/risk for each tree to fall. Tree locations were recorded using a Global Positioning System (GPS) device with submeter accuracy. Stantec also re-evaluated and updated the tree survey for all trees within the tree survey area in 2023. The tree survey area included all areas where trees had the potential to be removed or encroached upon by the project. The tree survey area which focused on the Lower and Middle Camps is shown on Figure 7 in the ISBA, as well as in Appendix A in the Arborist's Report. Trees were not mapped at the Upper Camp as the few trees occurring in that portion of the property are non-native, not protected, and would not be impacted by the project. Based on current conditions, no trees would be impacted or encroached upon at Upper Camp. Tree impacts would also need to be reevaluated closer to the time that Upper Camp would be constructed.

Stantec identified and evaluated a total of 610 trees during the 2020, 2022, and 2023 tree surveys, which included both Protected Trees and non-protected trees. The 2023 tree inventory is provided on the Surveyed Tree table in the ISBA and in the Arborist's Report, and a list of the tree species observed is provided in Table 1 in the Arborist's Report. There are numerous Protected Trees and many Heritage Trees at the site. The most common Protected Trees include native coast live oaks and California sycamores, and

non-native Eucalyptus trees. The non-native Eucalyptus trees are considered Protected Trees due to their ESHA status as potential winter roosting groves for monarch butterflies, and some of the larger Eucalyptus trees are also Heritage Trees. Appendix A of the Arborist's Report includes a series of maps depicting tree locations, tree condition, heritage trees, and Protected Trees. These maps include point data for the location of trees, and do not include canopy extents. The health and condition of the 610 surveyed trees is provided in **Table 4-2, Tree Health and Condition within Tree Survey Area.**

Table 4-2
Tree Health and Condition within Tree Survey Area

Health Rating	# of Trees	Description
1	116	A tree in severe decline, dieback of scaffold branches and or trunk, mostly epicormic growth; extensive structural defects that cannot be abated. Fire damage is severe and extensive (affecting the majority of the trunk and/or all major scaffold branches); live canopy is limited to epicormic and/or basal sprouts and structural damage is obvious including advanced decay, cavities, fungal fruiting bodies, etc.
2	172	A tree in decline, epicormic growth, extensive dieback of medium to large branches, significant structural defects that cannot be abated. Fire damage is moderate to severe and includes damage to large portions of the trunk and/or all major scaffold branches; areas of decay and/or other structural damage are present in trunk and/or most scaffold branches; live canopy is reduced, and epicormic/basal sprouts are abundant.
3	91	A tree with moderate vigor, moderate twig, and small branch dieback, thinning of crown, poor leaf color, moderate structural defects that may be mitigated with care. Fire damage is minor to moderate and limited to small areas of the trunk and/or minor branches; structural damage may be present on main trunk and/or few scaffold branches but is minor and healing over rapidly; live canopy is moderately vigorous.
4	58	A tree with slight decline in vigor, small amount of twig dieback, minor structural defects that could be corrected. Fire damage is minor, damaged foliage/tissue is recovering well; structural defects/damage are minor and limited to the canopy; live canopy is vigorous.
5	21	A healthy, vigorous tree, reasonably free of disease, with good structure and form typical of the species. Generally little to no fire damage is present; live canopy is vigorous.
Dead	152	Tree is dead; present either as a standing snag, a fallen snag or partly removed from the site.

As a result of the Woolsey Fire in 2018, fire damage to trees across the site is widespread and there are many dead trees and trees in fair to poor condition at the site. As shown in Table 4-2, of the 610 trees surveyed, 25 percent are dead, an additional 28 percent are in decline, and another 19 percent are in severe decline. While fire damage is extensive, Stantec arborists observed in 2023 that post fire regeneration appeared to be very good in native and non-native trees, notably coast live oak, California sycamore, and non-native

blue gum eucalyptus.

The project would impact a total of 389 trees, including Protected Trees and trees that are not protected by the CZO. Of the 389 trees that would be impacted, the project would remove 190 trees and would encroach into the TPZ of an additional 199 trees. The TPZ is used to describe the critical area of protection under a tree. The TPZ extends out from the trunk to 5 feet beyond the dripline, or a minimum of 15 feet from the trunk whichever is greater. The number of trees that would be removed or be encroached upon is summarized in **Table 4-3, Tree Removal/Encroachment Summary (All Trees).** Approximately 44% of the removals are trees that are dead as a direct result of fire damage. The project impacts to trees are also provided along with additional details in the Surveyed Trees table in the ISBA.

Table 4-3
Tree Removal/Encroachment Summary (All Trees)*

Impact Category		Number of Trees
Trees Proposed for Removal		190
Trees Subject to Encroachment	A (Less than 10%)	34
	B (10 to 30%)	57
	C (Greater than 30%)	108
	Total	**389**

* Includes all trees proposed for encroachment or removal regardless of status (includes protected and non-protected trees).

Of the 389 trees that would be impacted by the project, a total of 265 trees are Protected Trees, Heritage Trees, and/or ESHA trees. The number of CZO Protected Trees that would be removed or encroached upon is summarized in **Table 4-4, Tree Removal/Encroachment Summary (Protected Trees),** along with the number of trees that qualify as Protected Trees, Heritage Trees, and/or ESHA trees. A total of 88 CZO Protected Trees would be removed, and the TPZs of 177 Protected Trees would be encroached upon by the project. Tree removals and encroachments of the project would occur at many locations throughout the Lower and Middle Camps. Tree Disposition Plans and Tree Encroachment Exhibits by MLA Studio, which are included as Attachment D and Attachment F respectively to the ISBA (Attachment F), show the locations of trees and the trees that would be removed and encroached upon by the project, although these plans and exhibits require updating to show impacts based on the most current tree surveys and project plans. MLA Studio estimated canopy extents for the purposes of evaluating TPZ encroachments.

Table 4-4
Tree Removal/Encroachment Summary (Protected Trees)*

Impact Category	CZO Protected Trees				Total
	Protected Trees (Non-Heritage/ Non-ESHA)	Heritage Trees (ESHA)	Heritage Trees (Non-ESHA)	ESHA Trees	
Trees Proposed for	19	2	16	51	**88**

Impact Category	CZO Protected Trees				Total
	Protected Trees (Non-Heritage/ Non-ESHA)	Heritage Trees (ESHA)	Heritage Trees (Non-ESHA)	ESHA Trees	
Removal					
Trees Subject to Encroachment	45	14	42	76	**177**
Total	**64**	**16**	**58**	**127**	**265**
* Includes all Protected Trees proposed for encroachment or removal. All heritage and ESHA trees are Protected Trees. The Protected Tree column only includes those trees that are not heritage and/or ESHA.					

The proposed project would remove or encroach upon 265 protected trees distributed throughout the Middle and Lower Camps. This would include tree removals and encroachments for the proposed development as well as removal of selected dead trees for safety concerns. Many dead trees would remain with development of the project for their habitat value. Trees along Little Sycamore Creek would be protected in place during stream restoration activities.

Many of the trees that would be removed are dead or are in fair to poor condition. For example, 38 coast live oak trees would be removed by the project, and 16 of these coast live oak trees are dead, 9 are in decline (health rating of 2), and 10 are in severe decline (health rating of 1). Only three (3) coast live oak trees that would be removed are healthy trees. The health ratings of coast live oaks that would be encroached upon is more varied, with many trees in decline but many also in moderate to good health.

The project would remove many non-native trees from the site, and the applicant proposes to plant many California native trees, which would be a beneficial action, including tree species that are indigenous to the Santa Monica Mountains or already occur at the project site. The County CZO also requires replacement of trees removed or encroached upon at a 10:1 or 5:1 ratio, respectively, and thus planting of many additional native trees would be required as mitigation for removal and encroachment of the Protected Trees at the site. There would be a temporary loss of habitat in the short term as many trees are removed, but over time the overall habitat value with respect to native trees is expected to improve when compared to the existing condition, as planted trees become established and existing trees recover further from the Woolsey Fire. It is expected that common wildlife using the site will generally adapt to these changing conditions. Removal of trees could also result in the direct removal of roosting and nesting habitat for wildlife species known to occur in the area, such as roosting habitat for monarch butterflies and nesting habitat for resident and migratory birds. These potential impacts are addressed as potential impact to special-status wildlife species habitat and nesting birds under Section 4A-2.

The removal of 88 Protected Trees and the encroachment into the TPZ of 177 Protected Trees would be a potentially significant, but mitigable impact. With implementation of mitigation measures BIO-7 and BIO-8, impacts to Protected Trees would be reduced to a less-than-significant level (**Class II**). Mitigation measures BIO-7 and BIO-8 would require preparation of a Tree Protection, Planting, and Monitoring Plan, tree health monitoring to protect trees from adjacent project activities, and replacement of trees and oak woodland that would be removed or damaged in accordance with Section 8178-7 of the Ventura County CZO.

Since the start of the ISBA process some trees have either fallen or are now dead. It is anticipated that between the approval of the ISBA and the start of construction additional trees may be found in the same condition. Mitigation measures BIO-7 and BIO-8 are intended to address all living trees impacted by removal or encroachment at the time of construction; mitigation will not be required for fallen or otherwise dead trees.

Section 21083.4 of the Public Resource Code requires a county to mitigate for significant environmental effects of conversion of oak woodlands (project impacts to oak woodlands are addressed in Section 4B and Section 4D, below). Section 21083.4 gives the County discretion to develop appropriate mitigation measures for impacts to oak woodlands, with a limitation that no more than one-half of the mitigation requirement can be satisfied by planting of oak trees. The ESHA mitigation required by the County CZO (see mitigation measure BIO-17 in section 4D below) will also satisfy the oak woodland mitigation requirements of Section 21083.4, provided that no more than one-half of the mitigation involves planting oak trees. The extent to which mitigation for significant impacts to oak woodlands will involve planting oak trees will be addressed in the ESHA mitigation plan required by the County CZO and mitigation measure BIO-17.

4A-2. *Impact one or more animal species by reducing the species' population, reducing the species' habitat, fragmenting its habitat, or restricting its reproductive capacity?*

The project was evaluated for substantial adverse effects on special-status wildlife species. Special-status wildlife included wildlife that are:

- Listed or proposed for listing under the California and/or Federal Endangered Species Acts;
- Candidate species for listing under the California and/or Federal Endangered Species Acts;
- Designated as a California Fully Protected Species;
- Considered by CDFW to be a California Species of Special Concern;
- Pursuant to CEQA Guidelines Section 15380(d), species tracked by the CNDDB, which are considered by CDFW to be those species of greatest conservation concern; and,
- Included on Ventura County's Locally Important Animals list.

The status codes for special-status wildlife are described in **Table 4-5, Status Codes for**

Special-Status Wildlife.

Table 4-5
Status Codes for Special-Status Wildlife

FEDERALLY PROTECTED SPECIES	
FE (Federal Endangered)	A species that is in danger of extinction throughout all or a significant portion of its range.
FT (Federal Threatened)	A species that is likely to become endangered in the foreseeable future.
FC (Federal Candidate)	A species for which USFWS has sufficient information on its biological status and threats to propose it as endangered or threatened under the Endangered Species Act (ESA), but for which development of a proposed listing regulation is precluded by other higher priority listing activities.
FSC (Federal Species of Concern)	A species under consideration for listing, for which there is insufficient information to support listing at this time. These species may or may not be listed in the future, and many of these species were formerly recognized as "Category-2 Candidate" species.
STATE PROTECTED SPECIES	
SE (California Endangered)	A native species or subspecies which is in serious danger of becoming extinct throughout all, or a significant portion, of its range due to one or more causes, including loss of habitat, change in habitat, overexploitation, predation, competition, or disease.
ST (California Threatened)	A native species or subspecies that, although not presently threatened with extinction, is likely to become an endangered species in the foreseeable future in the absence of the special protection and management efforts required by this chapter. Any animal determined by the commission as "rare" on or before January 1, 1985, is a "threatened species."
SSC (California Species of Special Concern)	Animals that are not listed under the California Endangered Species Act, but which nonetheless 1) are declining at a rate that could result in listing, or 2) historically occurred in low numbers and known threats to their persistence currently exist.
SFP (California Fully Protected)	This designation originated from the State's initial effort in the 1960's to identify and provide additional protection to those animals that were rare or faced possible extinction. Lists were created for fish, mammals, amphibians, reptiles, and birds. Most fully protected species have also been listed as threatened or endangered species under the more recent endangered species laws and regulations. CFP species may not be taken or possessed at any time and no licenses or permits may be issued for their take except for collecting these species for necessary scientific research and relocation of the bird species for the protection of livestock.
WL	California Department of Fish and Wildlife Watch List
SA (Special Animal)	"SA" is used herein if the animal is included on the CDFW's Special Animals list but does not fall under any of the categories listed above or below. In general, special protection of these species is not mandatory under CEQA, although CDFW considers these species to be among those of greatest conversation need.
LOCALLY IMPORTANT SPECIES	
VC LIS	Ventura County Locally Important Animal.

Reconnaissance-level surveys were conducted by Stantec biologists in 2020, 2021 and 2022 to identify habitat that could potentially support special-status wildlife species. Incidental observations of wildlife were recorded during the reconnaissance surveys, and

a list of wildlife species observed is provided in Appendix 2 of the ISBA. No California Fully Protected species, California Species of Special Concern, Ventura County Locally Important Animals, or wildlife species listed or proposed for listing under CESA or FESA were observed during the reconnaissance surveys, or other biological surveys of the site. As discussed below, one wildlife species that is a candidate for listing under FESA was observed during biological surveys of the site, the monarch butterfly (*Danaus plexippus plexippus*)

Monarch Butterfly Overwintering Sites

Stantec also conducted a literature review to determine whether special-status wildlife has been documented within or in the vicinity of the project site. One special-status habitat for a special-status wildlife species is reported in the CNDDB, a monarch butterfly overwintering site (*Danaus plexippus plexippus* pop. 1) [FC], which is located at the Lower Camp. Monarch butterfly overwintering sites are groves of trees including water sources and associated understory plants where monarch butterflies roost together in groups to survive the winter. The CZO protects monarch butterfly overwintering sites as Environmentally Sensitive Habitat Area (ESHA), and overwintering sites are also considered sensitive by CDFW. According to the CNDDB, the overwintering site at the Camp Hess Kramer has been used by monarch butterflies for roosting since at least 1976, and the roosting trees at the overwintering site include non-native eucalyptus, native coast live oak (*Quercus agrifolia*), native sycamores (*Platanus racemosa*), and several other ornamental trees.

The overwintering site at Camp Hess Kramer burned in the Woolsey Fire in November 2018, and most of the roosting trees which consisted primarily of large eucalyptus were killed by the fire. A few of the trees survived the fire. The general location of the overwintering site, as provided by the CNDDB, as well as a more precise location of the overwintering site mapped by Stantec in coordination with the Malibu Monarch Project during a site visit on August 22, 2023 are shown on Figure 5.4 in the ISBA.

County policy is to consider overwintering roost sites occupied by monarch butterflies in one or more years within the previous 20-year period to be potentially active. The known roosting site at Camp Hess Kramer has been monitored from public roads for many years by Xerces Society for Invertebrate Conservation or their partners, and monarch roosting has been noted during several winters over the last 20 years. Monitoring activities have included estimating numbers of roosting monarchs, which has been relatively low over the last 20 years, with 745 the highest recent estimate in 2013. Higher numbers of roosting monarchs were observed by Xerces Society in the late-1990s, including 25,000 in 1997 and 8,000 in 1998. Data provided by the Xerces Society for their western monarch Thanksgiving counts (1997 – 2021), which includes the roosting site at the Camp, is provided as Attachment I to the ISBA (Attachment F).

As required by CZO Section AE-1.3.2(g), Stantec conducted focused surveys for roosting monarch butterflies in Winter 2023/2024. The survey included all potentially suitable roosting habitat within the biological Survey Area. CZO policy requires a search for

roosting monarch butterflies in the first half of the overwintering season (e.g., November) and a second survey in the second half of the overwintering season (e.g., January). To satisfy this requirement, Stantec conducted two surveys on November 30 and December 1, 2023, and two surveys on January 18 and 19, 2024. The surveys were conducted in accordance with the Xerces Society for Invertebrate Conservation (2023) Western Monarch Count Step-by-Step Monitoring Guide survey protocols.

Stantec biologists observed 66 individual monarchs during the November survey, including 12 individuals roosting alone, and 61 individual monarchs during the December survey, which included one cluster of five roosting monarchs and 33 monarchs roosting alone. The cluster of five individuals was in a stand of eucalyptus adjacent to Little Sycamore Creek not far upstream of the former roosting location. This stand of eucalyptus is estimated to include tree numbers T169 through T194 and is located approximately 125 feet north of vehicle bridge 6-V at the Lower Camp. Stantec biologists also observed 31 individuals during the January 18 survey, including three roosting alone, and eight individuals during the January 19 survey, including one roosting alone. No clusters of roosting monarchs were observed during the January surveys.

Stantec concluded based on the number of individual monarchs observed within and near the known overwintering site, as well as the observation of two potentially new roosting locations that monarch butterflies are using the site for overwintering. The two newly identified roosting locations include the eucalyptus stand located north of vehicle bridge 6-V, which is the former location of a dance stage where a climbing platform is proposed. The second newly identified roosting location is a stand of eucalyptus trees and coast live oaks located between the proposed dining hall (13N) and arts and crafts building (17N), which is estimated to contain tree numbers T311 – T323, TA77, and TA78, as shown in Attachment J of the ISBA (Attachment F). The mapped locations of these two new roosting sites as well as additional details on the methods and results of the surveys are provided in the Stantec memorandum Monarch Butterfly Surveys – Camp Hess Kramer, dated February 13, 2024.

In addition to the locations where roosting monarchs were observed, the subject property contains numerous other eucalyptus trees and California sycamore trees. Therefore, there is also potential for monarch butterflies to roost at other locations at the site as well as to roost in larger numbers in the future especially if there is further recovery or re-establishment of suitable roosting habitat.

The project includes the removal of six eucalyptus trees within the known roosting area, which would be removed for installation of a replacement vehicle bridge required by the Ventura County Fire Department (VCFD). Five of these trees are in decline, and one is in severe decline, based on a health evaluation by a Stantec arborist. Unless the trees pose a safety risk, the project would leave the remaining dead eucalyptus within the known roosting area in place to serve as habitat for other species. The project also includes the removal of one live eucalyptus tree at the newly identified roosting site north of vehicle bridge 6-V, which is in severe decline, and one eucalyptus and one coast live oak, which are healthy trees, at the newly identified roosting site between the proposed dining hall

and the arts and crafts building. Most of the remaining live trees within the newly identified roosting sites would be encroached upon by the project, as the understory of these stands would be partially graded. The newly identified roosting site to the north of vehicle bridge 6-V would be encroached upon by road improvements that are required by the fire department, and the site would also include the proposed companion climbing platform. The new roosting site near the proposed dining hall would be surrounded by structures and other development, such as wood decks, and would also be near the proposed ropes course.

Construction of the project could potentially impact monarch butterfly overwintering roosts by removing trees containing monarch butterflies as well as by disturbance from nearby construction activities, including potential encroachment of construction equipment and personnel, deposition of fugitive dust, and construction noise, which would be a potentially significant, but mitigable impact. To avoid construction period impacts, mitigation measure BIO-5A would require surveys for active roosts and establishment of a temporary 125-foot exclusionary buffer zone around active roosts throughout construction during the active roosting season. Implementation of mitigation measures BIO-5A would reduce potential impacts of construction on active monarch butterfly roosts to a less than significant level (**Class II**).

Active monarch butterfly roosts could also be disturbed during the operational phase by maintenance activities, encroachment of people and pets, and other general Camp activities, which would be a potentially significant, but mitigable impact. Mitigation measure BIO-5B would require preparation of a monarch butterfly roost management plan to ensure compatibility of project operations with active roosts sites, including but not limited to establishment of a 125-foot exclusionary buffer zone around the roost site throughout the active roosting season. Roosting monarch butterflies would be compatible with some amount of restrained non-invasive human activity in the vicinity of the roosts. The 125-foot buffer zone would be demarcated with temporary fencing and signage prohibiting access, except temporary access along designated roads and pathways. If the roost site is in developed areas of the Camp, at the discretion of a qualified biologist certain activities could be allowed to proceed within the buffer during the overwintering season provided active roosting is not disturbed, and the monarch butterflies flying or perched in the vicinity of the roosts including on the ground would not be harmed. Implementation of mitigation measure BIO-5B would reduce potential impacts of operations on potentially occurring active monarch butterfly roosts to a less than significant level (**Class II**).

The County considers monarch butterfly roost sites to be noise sensitive receptors potentially subject to adverse effects of noise, including amplified sound. The project would involve the use of amplified sound at several locations throughout the project site. These areas are shown on project exhibits (Attachment B-3). These areas have historically been used during and outside of the summer camp season and would continue to do so with the proposed project. The impacts of amplified sound on noise sensitive receptors including potentially occurring monarch butterfly overwintering roosts would be a potentially significant, but mitigable impact. Implementation of mitigation

measure BIO-6 would require preparation of a biological resources noise management plan to minimize project related noise impacts on sensitive noise receptors to a less than significant level (**Class II**). The plan shall address siting and design of sound systems, timing of use, sound monitoring, and sound attenuation reduction measures that would ensure compliance with the County CZO noise standards and minimize potential impacts of amplified sound on noise sensitive receptors.

The project would remove potential monarch butterfly roosting habitat as the project would remove trees of species that are known to be used for monarch butterfly roosting, including numerous eucalyptus and California sycamore trees. The removal of Protected Trees is discussed in Section 4A-1. The removal of this potential monarch butterfly roosting habitat as well as the removal of live trees within any known overwintering sites including the six living trees within the known roosting site and the three living trees within the newly identified roosting sites would be a significant, but mitigable impact. Implementation of mitigation measure BIO-5B would reduce the potential loss of monarch overwintering habitat to a less than significant level (**Class II**). Mitigation measure BIO-5B would require avoidance of live trees within known overwintering sites to the maximum extent feasible, and preparation of a monarch butterfly habitat management plan for the establishment, restoration, or enhancement of monarch butterfly roosting habitat to compensate for roosting habitat removed.

Several California sycamores would be planted within and near Little Sycamore Creek as part of the proposed project (the stream restoration component of the project is discussed in more detail in Section 4C), and planting of California sycamores would also be required as mitigation for project impacts to California sycamore trees. The project would plant these trees in clusters according to species and location along the stream and within the valley, with the intention of providing canopy conditions that could potentially support roosting monarch butterflies. The stream restoration project will also include native plantings that would improve the site habitat and nectaring opportunities for monarch butterflies and other pollinators. The stream restoration would be beneficial for the monarch butterfly, and once California sycamore trees become established and reach sufficient size, they could be suitable roosting habitat for overwintering monarchs provided the required roosting and microsite conditions are achieved. A memorandum by Environmental Science Associates (ESA) discussing the proposed enhancement of Little Sycamore Creek and how it would improve habitat for monarch butterflies and other pollinators is provided as Attachment H to the ISBA (Attachment F).

Construction and operation of the project could also result in the introduction and proliferation of non-native invasive plants, which could degrade native habitats including nectaring habitats for overwintering monarch butterflies. Implementation of mitigation measure BIO-9, which would require a non-native species control and management plan to prevent the introduction and proliferation of non-native species, would reduce this impact to less than significant (**Class II**).

Potentially Occurring Special-Status Wildlife

The potential for special-status wildlife species to occur was evaluated based on the field observations of habitat and other site conditions, information available in standard biological references, and local knowledge of the surveying biologists. The potential for occurrence analysis is provided in Section 3.2 of the ISBA. In addition to monarch butterflies and monarch butterfly overwintering habitat, which have been previously observed at the site, six special-status wildlife species including three reptiles, one bird, and two mammals were determined to have high or moderate potential to occur, while other species evaluated had low or no potential to occur. The site does not contain permanent aquatic habitats that could support fish species, or aquatic habitats that could support the life cycle requirements of special-status amphibians. The following special-status species were determined to have high or moderate potential to occur within the Survey Area:

- California glossy snake (*Arizona elegans occidentalis*) [SSC, VC LIS]
- Coastal whiptail (*Aspidoscelis tigris stejnegeri*) [SSC]
- Cooper's hawk (*Accipiter cooperii*) [WL]
- Mountain lion (*Puma concolor*) [Candidate ST - Southern California / Central Coast ESU]
- San Diego desert woodrat (*Neotoma lepida intermedia*) [SSC]
- Southern California legless lizard (*Anniella stebbinsi*) [SSC]

Much of the project footprint is developed or disturbed and would not be inhabited by special-status wildlife species, although potentially occurring special-status wildlife could occur within disturbed areas occasionally. Portions of the project footprint such as riparian habitats, oak woodlands, and native scrub habitats contain intact or disturbed native habitats that are more likely to contain or support special-status wildlife.

Project construction could potentially impact the special-status coastal whiptail, southern California legless lizard, California glossy snake, and desert woodrat, if they are present at the site. These species are relatively slow moving or could be present in burrows, cavities, or nest structures, or could be otherwise concealed or incapable of escaping harm. Impacts to coastal whiptail, southern California legless lizard, California glossy snake, and desert woodrat during construction could result from grading, vegetation cutting and removal, construction, fugitive dust, and general disturbance from nearby construction activities, which would be a potentially significant, but mitigable impact. Construction phase impacts may affect a few individuals, if present, but impacts would be localized. Implementation of BIO-1, BIO-2, BIO-3, BIO-10, BIO-19 and BIO-20 would reduce these potential impacts on potentially occurring special-status wildlife species to a less than significant level (**Class II**). Mitigation measures BIO-1, BIO-2, BIO-3, BIO-10, BIO-19 and BIO-20 require pre-construction surveys of wildlife species and specific protocol surveys for desert woodrat, and biological monitoring throughout construction, environmental awareness training for project personnel, implementation of standard construction phase BMPs, and a lighting and fencing plan.

Although some suitable habitat for the coastal whiptail, southern California legless lizard,

California glossy snake, and desert woodrat species would be removed, modified, or disturbed by the project, it would be relatively small when compared to the amount of remaining suitable habitat remaining in the surrounding area. Habitat loss or habitat modification affecting the coastal whiptail, southern California legless lizard, California glossy snake, and desert woodrat could result in direct impacts or displacement of some individuals but would not adversely impact a population of any of these species. Implementation of mitigation measures BIO-1, BIO-9, BIO-10, BIO-11, and BIO-13 through BIO-18 would reduce the potential impacts to the coastal whiptail, southern California legless lizard, California glossy snake, and San Diego desert woodrat habitat (**Class II**). Mitigation measures BIO-1, BIO-9, BIO-10, BIO-11, and BIO-13 through BIO-18 require construction exclusion fencing, native and non-native plant species control and management plan, focused rare plant surveys, consultation (and permit authorization) from state and federal agencies, and submittal of an ESHA Mitigation Plan for review and approval.

The Cooper's hawk is a resident species that could nest in woodland habitats and other tall trees at the site. Common raptors have also been observed at the site, including red-tailed hawk, and additional common raptor species are potentially occurring, which could also nest at the site. The Cooper's hawk as well as other potentially occurring adult special-status birds would be reasonably capable of escaping direct harm during construction, but would be susceptible to mortality, injury, and disturbance while nesting, which is addressed under the "Nesting Birds" heading, below. With development of the project there would continue to be nesting and foraging habitat at the site for the Cooper's hawk and common raptor species.

The mountain lion, including southern California and Central Coast populations which are currently under formal CDFW review for listing under CESA and therefore have all protections of a listed species, is expected to occur within the Survey Area. Mountain lions may pass through the project site occasionally as they likely use the Little Sycamore Creek corridor, although they would generally avoid the most developed areas of the site including areas of routine human activity. A mountain lion would be capable of escaping direct harm during construction. Factors identified in the listing petition as relevant to the decline of mountain lions include low genetic diversity and inbreeding depression; vehicle strikes; depredation and illegal kills; intraspecific strife; abandonment; poisoning from rodenticides and other environmental toxicants, wildfires, and climate change. The project would not contribute directly or indirectly to impacts to mountain lions caused by low genetic diversity and inbreeding depression, intraspecific strife, abandonment, wildfires, or climate change as the project would not result in loss or fragmentation of mountain lion habitat, restrict habitat connectivity, or permanently disrupt wildlife movement (see the habitat connectivity analysis under threshold 4E, below). Stream restoration activities would be disruptive to movement during the construction phase, but this would be temporary and mountains lions, which have large home ranges, would be capable of adapting and using other native habitats in the surrounding area for movement. Also, the project would be constructed in accordance with applicable State, County Fire, and Building Codes, such that the project would not represent a fire hazard or otherwise be a cause of increased wildfire frequency, and the project would comply with the applicable

State and County policies adopted for the purpose of reducing greenhouse gas emissions. No livestock would be contained on the property that could potentially result in conflicts between mountain lions and livestock that could necessitate depredation permits that could result in the death of a mountain lion. With respect to vehicle strikes on mountain lions, the potential for a vehicle strike on a mountain lion at the project site itself is low given the low vehicle speeds that would be observed and that mountain lions would generally avoid areas of human activity. Also, the project does not involve construction of new high-speed roads and would not change traffic patterns or alter the movement patterns of mountain lions such that they would be more likely to cross highways or other public roads in the area. Yerba Buena Road would be used by visitors and employees to access the project site, but it is an existing well-traveled road and traffic volumes would not increase substantially when compared to the overall use of the road including during the operation at the site. The use of anticoagulant rodenticides at the project site would potentially result in loss or harm to mountain lions as well as other large predators, which would be a potentially significant, but mitigable impact. Implementation of mitigation measure BIO-12 would reduce the potential impact of anticoagulant rodenticides on mountain lions and other wildlife species to a less than significant level (**Class II**). Mitigation measure BIO-12 would prohibit the use of anticoagulant rodenticides in association with the project.

During the operational phase there is some potential for special-status wildlife species to be harmed by vehicles moving along internal roads and at parking lots; however, given that special-status wildlife species would generally occur in native habitats, the low vehicle speeds that would be observed, and the low number of animals that would be potentially affected this potential impact would be less than significant.

The project would involve outdoor lighting during nighttime hours. Outdoor lighting can potentially affect wildlife orientation, as well as attraction or repulsion to the altered light environment, which may affect wildlife foraging, reproduction, migration, and communication. If not controlled, light trespass and glare could disturb native habitats and associated wildlife at the project site and in the surrounding area, which could affect the normal behavior of wildlife, including their movement, and cause wildlife be attracted to lighting or to avoid affected native habitats in the area. Project outdoor lighting would be operated in developed areas not in native habitats, but there are intact native habitats adjacent to the proposed development and in the surrounding area. The project would be required to conform to the lighting policies of the County CZO, which regulates outdoor lighting to promote and maintain dark skies at night for residents and wildlife. The County CZO contains policies including but not limited to shielding and downward orientation of lights, restrictions on lighting height, and restrictions on hours of operation, which would minimize potential impacts on native habitats and wildlife at the project site and in the surrounding area. With implementation of mitigation measure BIO-19, potential impacts of outdoor lighting on ESHAs and associated wildlife at the project site and in the surrounding area would be less than significant (**Class II**). Mitigation measure BIO-19 would require the Applicant to prepare a lighting plan for approval by the Ventura County Planning Division that conforms with County lighting policies as well as additional best management practices for lighting near ESHAs.

Nesting Birds

The Federal Migratory Bird Treaty Act (MBTA) and the California Fish and Game Code (Sections 3503, 3503.5, 3511, 3513 and 3800) protect most native birds. In addition, the federal and state Endangered Species Acts protect some bird species listed as Threatened or Endangered. Project-related impacts to birds protected by these regulations could occur during the breeding season, because unlike adult birds, eggs and nestlings are unable to escape impacts.

Fish and Game Code Section 3513 upholds the MBTA by prohibiting any take or possession of birds that are designated by the MBTA as migratory nongame birds except as allowed by federal rules and regulations promulgated pursuant to the MBTA. In addition, there are Fish and Game Code Sections 3503, 3503.5, 3511, and 3800, which further protect nesting birds and their parts, including passerine birds, raptors, and state "fully protected" birds.

Birds may nest within the project area in trees, shrubs, dense herbaceous vegetation, on the ground, and in man-made structures, equipment, and debris piles. Project activities including but not limited to ground and vegetation disturbance conducted during the nesting bird season (January 1 through September 15), could potentially impact nesting birds protected under the MBTA and Fish and Game Codes. Some special-status bird species such as Cooper's hawk and numerous non-special-status bird species may nest within or in the vicinity of the project site and could be directly impacted if present during project activities. Also, birds nesting in the vicinity of project activities could be disturbed by noise, lighting, dust, and human activities associated with the project, which could result in nesting failure and the loss of eggs or nestlings, which would be significant, but mitigable impact. The County also considers nesting birds to be noise sensitive receptors potentially subject to adverse effects of noise, including amplified sound. As discussed, the project would involve the use of amplified sound at several locations throughout the project site. The effects of amplified sound on nesting birds would also be a potentially significant, but mitigable impact. Implementation of mitigation measures BIO-2, BIO-4, BIO-6, BIO-10, which would require surveys for nesting bird surveys and avoidance of active nests, pre-construction surveys and biological monitoring throughout construction, environmental awareness training for project personnel, preparation of a biological resources noise management plan, and implementation of BMPs, and would reduce these impacts to a less than significant level (**Class II**).

Mitigation/Residual Impacts

Mitigation Measure BIO-1: Environmentally Sensitive Habitat Areas (ESHA) Construction Exclusion Fencing

Purpose: To prevent encroachment in an ESHA or buffer zone and reduce the potential indirect effects on adjacent habitat consistent with the Coastal Act, Ventura County Coastal Area Plan Policy 5.19, and Ventura County Coastal Zoning Ordinance § 8178-2.5.1.

Requirement: The Permittee shall install temporary protective fencing along the edge of the development envelope (including the fuel modification zone) where active construction activities are taking place. Areas where no construction will be active, fencing is not required until that phase of construction activities is ready to commence; said fencing shall then be installed ten days prior to any start of construction activity. Where individual trees and ESHA habitat are located in the same vicinity, only one temporary fence is required to protect both resources. The fencing must consist of durable materials and shall be staked or driven into the ground such that it is not easily moved and will perform its function for the duration of construction activities.

Documentation: The Permittee shall submit a Construction Exclusion Fencing Plan that graphically shows the ESHA habitat and setback area from ESHA on all grading and site plans. The Permittee shall also provide photo documentation of the fencing installed at the site prior to commencement of grading (earth disturbing) activities.

Timing: Prior to issuance of a Zoning Clearance for grading, the Permittee shall submit the Construction Exclusion Fencing Plan and photo-documentation to the Planning Division for review and approval. The Permittee shall install the fencing in active construction areas prior to any vegetation removal, ground disturbance activities, or construction activities (whichever occurs first). The Permittee shall provide photo documentation of the fencing installed at the site prior to commencement of grading (earth disturbing) activities. The Permittee shall maintain the fencing in place until the Resource Management Agency, Building and Safety Division, issues the Certificate of Occupancy.

Monitoring and Reporting: The Planning Division maintains the Construction Exclusion Fencing Plan and the photo documentation provided by the Applicant in the project file. The Planning Division has the authority to inspect the site to confirm that the fencing stays in place during the development phase of the project in accordance with the approved plans.

Mitigation Measure BIO-2: Pre-Construction Surveys and Relocation of Special-Status Species

Purpose: To avoid significant impacts to special-status wildlife species that may be present during vegetation clearing and grading.

Requirement: Two weeks prior to the initiation of, and periodically throughout, ground disturbance activities, a County-approved qualified biologist shall conduct surveys for special-status wildlife, including coastal whiptail [*Aspidoscelis tigris stejnegeri*], coast horned lizard [*Phrynosoma blainvilli*]) and San Diego desert woodrat (*Neotoma lepida intermedia*), to ensure that these species are not harmed. Individuals of these species that are found shall be relocated to suitable undisturbed habitat, outside of the areas directly and indirectly (e.g., noise) affected by ground disturbance activities, as determined by a County-approved qualified biologist. The County-approved qualified biologist, with a CDFW Scientific Collecting Permit, shall conduct surveys and avoidance and relocation activities according to methods approved by the CDFW.

Additionally, the project biologist(s) shall perform the following duties:

1. Attend a pre-construction meeting with the contractor and other key construction personnel prior to land clearing activities to conduct environmental training to include, but limited to, discussion of the importance of restricting work to designated areas, and identification of and minimizing harm to or harassment of wildlife that could be encountered.
2. Review and/or designate the construction area in the field with the contractor in accordance with the final grading plan.
3. The biologist shall monitor vegetation grubbing and initial grading in order to salvage and relocate wildlife that could be disturbed by this activity.
4. Periodically monitor the construction site to verify silt fencing is intact, trash receptacles are animal and weather-proof, and there is a prohibition of pets on the construction site.
5. Prepare a monitoring report after the land-clearing activities are completed, which describes the biological monitoring activities, including a monitoring log, photos of the site before, during, and after land clearing activities, and a list of special-status species observed.

Documentation: The Permittee shall provide to the Planning Division a signed contract (financial information redacted) with a County-approved qualified biologist that ensures wildlife surveys, and relocation of wildlife will be conducted within 14 days prior to, and during, any ground disturbance activities. The Permittee shall submit a memorandum to the Planning Division within 14 days of the wildlife surveys, notifying the Planning Division of the results of the surveys and avoidance and relocation activities. The memorandum shall include, but not be limited to, a monitoring log, photos of the site before, during, and after land clearing activities, and a list of special-status species observed.

Timing: Prior to the issuance of a Zoning Clearance for grading, the Permittee shall provide to the Planning Division the signed contract. Within 14 days of the wildlife surveys and avoidance and relocation activities, the Permittee shall provide to the Planning Division the memorandum reporting results.

Monitoring and Reporting: The Planning Division maintains copies of the signed contract and the memorandum reporting results in the project file. The Planning Division has the authority to inspect the property during the development phase of the project to ensure that the survey and wildlife relocation work is conducted as required. If the Planning Division confirms that the required surveys are not conducted as agreed upon, enforcement actions may be enacted in accordance with § 8183-5 of the Ventura County Coastal Zoning Ordinance.

Mitigation Measure BIO-3: Woodrat Nest Avoidance and Relocation

Purpose: In order to minimize impacts to special-status woodrats, land clearing and construction activities shall be regulated.

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

1. Surveys: Conduct site-specific surveys prior to land clearing or construction activities. A County-approved qualified biologist with a CDFW Scientific Collecting Permit shall survey suitable habitat for special-status woodrats within areas that will be subject to land clearing activities, and within 50 feet of areas, that will be subject to land clearing activities 14 days prior to the initiation of land clearing or construction activities. If the biologist does not find any nests, then no further action is required.

2. Avoidance Measures:

    a. If the County-approved qualified biologist finds active woodrat nests, the Permittee shall implement a 50-foot radius buffer area around the nests in which land clearing activities will be avoided.

    b. Wildlife exclusion fencing shall be installed around land clearing activities where middens are detected within 50 feet of the project footprint. Orange snow fencing is not considered a wildlife exclusion fence and is prohibited in areas where middens are found.

3. Relocation of Middens: If the minimum fencing distance cannot be achieved and the middens cannot be protected and/or avoided, the County-approved qualified biologist in consultation with CDFW will select the location of artificial midden sites. The relocation or disturbance of wood rat midden areas are prohibited during the peak nesting season (November 1 through March 15). Woodrat middens will be relocated according to the following instructions:

    a. Artificial Midden Ratio: Artificial middens shall be installed at a 2:1 ratio for less than 5 middens impacted. If more than 5 middens are impacted in the population, the qualified biologist shall consult with the Planning Division to determine the appropriate ratio.

    b. Artificial Midden Location: Midden locations shall include but not be limited to downed woody debris, cactuses, dense understory and overstory cover (ideally 90 percent cover), or other "core element" (e.g., a stump, large log, rock, rock outcrop), and outside of drainage channels. Artificial middens shall be placed in a clustered pattern relative to adjacent natural middens (when present) and no further than 550 feet of the project footprint.

c. Dismantling of Natural Middens: The entire midden site, including the aboveground midden and the below ground basement area, will be carefully examined to ensure that no adults or young are present before the midden is dismantled and the basement filled in.

d. Trapping: If woodrats are present a trapping effort will be initiated. The trapping will consist of two to three live traps per active midden site being set each evening for 3 days. The traps will be baited with oatmeal, peanut butter, and apple and will contain synthetic batting for use as nesting material. Traps will be checked the following morning within 1 hour following sunrise. Traps containing woodrats will be placed facing the entrance of relocated middens and opened, allowing the woodrats to leave the traps on their own accord. Each release site will be monitored for approximately 1 hour after each woodrat is released to determine the short-term success rate of the artificial middens.

e. Dismantling Middens: To provide refuge for woodrats that may become displaced, piles of sticks/vegetation/slash shall be placed between the midden site to be dismantled and the new artificial midden site, 3 days prior to dismantling. The midden will be dismantled by hand, removing the materials layer by layer. All salvageable midden materials will be relocated and incorporated (as needed) or placed adjacent to the artificial midden.

f. Post-Midden Relocation: The qualified biologist will perform a survey to determine if the woodrat has reoccupied the project footprint following the implementation of the midden relocation measures.

4. Woodrat Presence and Activity After Midden Relocation: If newly constructed middens are found inside the project footprint following the commencement of land clearing activities, the trapping effort noted in section 4(d) above) shall be implemented.

Documentation: The Permittee shall provide to the Planning Division a Survey Report from the County-approved qualified biologist that includes a map, physical description of middens (e.g., size, width, and materials), a photo of each of the midden, and a plan for avoidance or relocation of the midden in accordance with the requirements set forth in this mitigation measure. Along with the Survey Report, the Permittee shall provide a copy of a signed contract (financial information redacted) with the qualified biologist(s) who will monitor avoidance and relocation efforts. Following the completion of land clearing activities, the Permittee shall submit to the Planning Division a Mitigation Monitoring Report from the qualified biologist(s) that documents the actions implemented to avoid or relocate woodrat nests, a map of the natural and artificial midden locations, trapping and relocation procedures, and the results of the relocation effort.

Timing: Prior to issuance of a Zoning Clearance for grading, the Permittee shall submit the Survey Report and signed contract to the Planning Division. The Mitigation Monitoring Report shall be submitted within 14 days of completion of the land clearing activities. The County-approved qualified biologist shall conduct the survey within 14 days prior to the

initiation of land clearing activities and follow all relocation timing protocols set forth in this condition (above).

Monitoring and Reporting: The Planning Division reviews for adequacy, and maintains in the project file, the signed contract, Survey Report, and Mitigation Monitoring Report. If the Planning Division confirms that the required surveys and relocation measures were not implemented in compliance with the requirements of this condition, then enforcement actions may be enacted in accordance with § 8183-5 of the Ventura County Coastal Zoning Ordinance.

Mitigation Measure BIO-4: Nesting Bird Surveys and Avoidance Measures
Purpose: In order to prevent impacts to birds protected under the Migratory Bird Treaty Act, land clearing and construction activities shall be regulated.

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

a. Timing of land clearing or construction: Prohibit land clearing or construction activities during the breeding and nesting season (January 1 – September 15), in which case the following surveys are not required; or
b. Surveys and avoidance of occupied nests: Conduct site-specific surveys prior to land clearing or construction activities during the breeding and nesting season (January 1 – September 15) and avoid occupied bird nests. A County-approved qualified biologist shall conduct surveys to identify any occupied (active) bird nests in the area proposed for disturbance. Occupied nests shall be avoided until juvenile birds have vacated the nest.

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

Documentation: The Permittee shall provide to the Planning Division a Survey Report from a County-approved qualified biologist documenting the results of the initial nesting bird survey and a plan for continued surveys and avoidance of nests in accordance with the requirements set forth in this condition (above). Along with the Survey Report, the Permittee shall provide a copy of a signed contract (financial information redacted) with a County-approved biologist responsible for the surveys, monitoring of any occupied nests discovered, and establishment of mandatory setback areas. The Permittee shall submit to the Planning Division a Mitigation Monitoring Report from a County-approved qualified biologist following land clearing activities documenting actions taken to avoid nesting birds and results.

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

Monitoring and Reporting: The Planning Division reviews the Survey Report and signed contract for adequacy prior to issuance of a Zoning Clearance for grading. The Planning Division maintains copies of the signed contract, Survey Report, and Mitigation Monitoring Report in the project file. If the Planning Division confirms that the required surveys were not implemented in compliance with the requirements of this condition, then enforcement actions may be enacted in accordance with § 8183-5 of the Ventura County Coastal Zoning Ordinance.

<u>Mitigation Measure BIO-5A: Monarch Butterfly Winter Roost Site Surveys</u>
Purpose: To avoid and/or minimize direct and indirect impacts to Monarch butterfly.

Requirement: In the fall/winter prior to the start of construction a County-approved qualified biologist must survey all suitable roosting habitat within 1,000 feet of the proposed project with the first occurring during the first half of overwintering season (October – March) and the second in second half of the season. If the results of the surveys are negative for butterflies the project may proceed and the biological monitor shall continue to monitor suitable roosting habitat during the overwintering season for aggregations of roosting butterflies. If portions of the project are found to serve as an aggregation or roosting site for monarch butterflies, then a 100-ft no activity buffer shall be placed around these areas. No work shall be conducted within the buffer unless authorized by the County and only with the presence of a County-approved qualified biologist to monitor the populations. If winter roost trees are cited for removal due to safety or mortality concerns, they shall only be removed in coordination with and approval from the County.

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

The Permittee shall provide a copy of a signed contract (financial information redacted) with the qualified biologist(s) who will survey suitable roosting habitat, prepare daily logs, letter reports, an overwintering season report and mapping.

Documentation: The Permittee shall submit a copy of a signed contract (financial information redacted) with a County-approved biologist responsible for compliance with this condition.

The County-approved qualified biologist shall prepare the following documents:

1. Daily field logs/notes for both pre-construction surveys and for monitoring of existing populations
2. A letter report detailing the methods and results of the pre-construction surveys
3. An overwintering season report that includes but is not limited to, a summary of daily monitoring activities and a GIS based map of all roosting locations.
4. A map of all observed roosting sites, if present (and provided to the on-site construction personnel).

Timing: Surveys shall be conducted during the overwintering period from October – March. Prior to issuance of a Zoning Clearance for grading, a letter report detailing the methods and results of the pre-construction surveys shall be provided to the County. Prior to issuance of a Zoning Clearance for grading, the Permittee shall submit the signed contract with the qualified biologist, and an overwintering season report that includes the required documentation listed above to the Planning Division.

Monitoring and Reporting: The Planning Division reviews the overwintering season report and signed contract for adequacy prior to issuance of a Zoning Clearance for grading. The Planning Division maintains copies of the signed contract, overwintering season report. If the Planning Division confirms that the required overwintering roosting surveys were not implemented in compliance with the requirements of this condition, then enforcement actions may be enacted in accordance with § 8183-5 of the Ventura County Coastal Zoning Ordinance.

<u>Mitigation Measure BIO-5B: Monarch Butterfly Habitat Enhancement/Management Plan</u>
Purpose: To comply with Ventura County Coastal Zoning Ordinance §§ 8178-2.7.8 and 8178-2.10.7.d, and to enhance existing and restored monarch butterfly habitat and develop a site-specific management plan for the species.

Requirement: The Permittee shall provide, for the County's review and approval, a Monarch Butterfly Habitat Enhancement/Management Plan prepared by a County-qualified biologist, for the preservation of two existing roost sites and/or the restoration or enhancement of one historical roost site. The Monarch Butterfly Habitat Enhancement/Management Plan shall include but not be limited to the following:

1. size, number, species of trees being planted in and around the roosting location;
2. the size, number, and species of replacement trees to be planted in place of dead eucalyptus that fall or need to be removed for safety reasons, or that could fail in the future and present safety risk;
3. location and arrangement of the trees to support a wind protected grove with dappled light;
4. additional plantings of California sycamore trees and other native potentially suitable roosting trees for monarchs in clusters along the stream and within the valley, with the intention of providing canopy conditions that could potentially support roosting monarch butterflies
5. how the growth and health of these trees will be monitored; and
6. success criteria.

Documentation: The Permittee shall provide to the Planning Division a signed contract (financial information redacted) with a County-approved qualified biologist and a copy of the Draft and Final Monarch Butterfly Habitat Enhancement/Management Plan for review and approval.

Timing: Prior to issuance of a Zoning Clearance for grading, the Permittee shall submit the signed contract with the County-qualified biologist responsible for preparing the Monarch Butterfly Habitat Enhancement/Management Plan. Prior to issuance of a Zone Clearance for construction, the Permittee shall submit the Draft and Final Monarch Butterfly Habitat Enhancement/Management Plan to the Planning Division for review and approval. The Permittee shall submit the biologist's reports on the progress of the planted trees to the Planning Division by December 30th annually for seven years following completion of construction (or more if the success criteria have not been met by Year 7).

Monitoring and Reporting: The Planning Division shall verify that replaced trees will have at least a 70% survival rate after seven years. If the survival rate is less than 70% after seven years, the Permittee shall install replacement plantings until the 70% survival rate for a seven-year duration is met. The Planning Division maintains copies of the Final Monarch Butterfly Habitat Enhancement/Management Plan in the project file. The Planning Division has the authority to conduct periodic site inspections to ensure ongoing compliance with this condition consistent with the requirements of § 8183-5 of the Ventura County Coastal Zoning Ordinance.

Mitigation Measure BIO-6: Biological Resources Noise Management Plan

Purpose: To comply with Ventura County Coastal Zoning Ordinance §§ 8178-2.4.4.1(c).1 and 8178-2.6.16(a) and to minimize and reduce project related noise impacts on nesting birds and monarch butterfly roosting sites acknowledging roosting or nesting sites or locations may change over time as restoration of Little Sycamore Creek and planting of new trees is completed and those plantings mature.

Requirement: The Permittee shall retain a County-approved qualified biologist to develop a Biological Resources Noise Management Plan that outlines procedures to document the usage of portions of the project site, by nesting birds and/or roosting monarch butterflies, that are subject to noise from events with outdoor amplified noise.

Documentation: The Permittee shall provide to the Planning Division a signed contract (financial information redacted) with a County-approved qualified biologist.

The Permittee shall develop a Biological Resources Noise Management Plan that includes, but not be limited to, the following:

- List and location of proposed amplified noise sources.
- General description of the species of birds known to nest in general area.
- Description of known monarch butterfly roosting locations within and adjacent to the project.
- Proposed survey timing/methodology/duration for both nesting birds and monarch butterflies.
- Survey and monitoring documentation requirements; and
- Adaptive management measures and procedures to minimize and/or avoid impacts (e.g., number of speakers, speaker location, orientation, etc.).
- Based on survey results, GIS based maps shall be prepared noting the location of nests and monarch butterfly roots.

Timing: Prior to issuance of a Zoning Clearance for construction, the Permittee shall provide to the Planning Division the signed contract confirming a qualified biologist has been retained. Prior to Certificate of Occupancy for any habitable structures/buildings in Lower and Middle Camp, the Biological Resources Noise Management Plan shall be submitted to the Planning Division for review and approval.

Monitoring and Reporting: The Planning Division maintains the Biological Resources Noise Management Plan in the project file. The Planning Division has the authority to conduct periodic site inspections to ensure ongoing compliance with this condition consistent with the requirements of § 8183-5 of the Ventura County Coastal Zoning Ordinance.

Mitigation Measure BIO-7: Tree Protection Plan (TPP)

Purpose: To comply with the County's Tree Protection Regulations (TPR) set forth in § 8178-7 et seq. of the Ventura County CZO and with the Oak Woodland Conservation Act (OWCA) (PRC § 21083.4, Fish and Game Code § 1361)

Requirement: The Permittee shall retain a qualified arborist to consolidate and prepare the documentation regarding the health of the protected trees, and conservation of the oak woodlands provided in the arborist report (Stantec, September 26, 2023) prepared for the project and the monitoring and reporting requirements for individual protected trees and oak woodlands (the "TPP").

Individual Protected Trees: The Permittee shall avoid impacting protected trees proposed to remain in place. The Permittee will be responsible for mitigating protected trees pursuant to tree disposition for tree removal and encroachment included in ISBA/Arborist report (Stantec, September 26, 2023). The Permittee shall offset or mitigate the loss of protected trees resulting from development or construction activities. If protected trees are felled/damaged and require offsets/mitigation, the Permittee shall post a financial assurance to cover the costs of planting and maintaining the offset trees.

Oak Woodland Conservation: The oak woodlands will be mitigated in compliance with Public Resources Code § 21083.4(b). Oak woodlands will be mitigated through one or more of the following: tree planting, oak woodland conservation easements, and/or contributions to an oak woodlands conservation agency.

A total of 23 oak trees and 13 sycamore trees are proposed to be removed from designated oak woodland. For every oak tree removed from an oak woodland site the Permittee shall collect acorns or seedlings from the site for the purpose of introducing or restoring oak woodlands.

Documentation: The Permittee shall submit to the Planning Division for review and approval, a TPP pursuant to the "Content Requirement for Tree Protection Plans" that is currently available on-line at: https://docs.vcrma.org/images/pdf/planning/tree-permits/Tree-Protection-Plan.pdf and the requirements for oak woodlands mitigation under Public Resources Code § 21083.4(b). The TPP must include (but is not limited to):

Individual Protected Trees:

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

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

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

Oak Woodlands:

a. mitigation required under Public Resources Code § 21083.4(b);
b. the method(s) to fulfill such mitigation requirements; and
c. if in-lieu contributions will be paid to a conservation agency for oak woodlands mitigation, the identity of the conservation agency, a tree mitigation plan that explains how the contributions will be used to fulfill the mitigation requirements and the proposed contract between the conservation agency and the Permittee. After the Planning Division's review and approval of the tree mitigation plan, the Permittee shall provide the Planning Division with a copy of the contract between the conservation agency and the Permittee.

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

Timing: Prior to the issuance of a Zoning Clearance for grading, the Permittee shall provide to the Planning Division the signed contract confirming a qualified arborist has been retained, the TPP for review and approval, and documentation demonstrating the Permittee implemented the tree protection measures. Unless otherwise approved by the Planning Director, replacement and transplant trees must be planted prior to issuance of any applicable Certificate of Occupancy. Other monitoring and reporting dates shall be indicated in the approved TPP.

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

If in lieu contributions are required to be paid to an approved conservation agency for oak woodland mitigation, the Permittee shall submit evidence of the payment of those contributions, together with the required tree mitigation plan and contract from the conservation organization, to the Planning Division, prior to the issuance of a Zoning Clearance for grading.

Financial Assurance: If a financial assurance is required, the Permittee shall submit the required financial assurance and the completed "Financial Assurance Acknowledgement" form, to the Planning Division, prior to the issuance of a Zoning Clearance for construction

and within 30 days of the Planning Division's approval of the TPP Damaged Tree Addendum. The Planning Division may release the financial assurance after receiving the report from the project arborist that verifies that the replacement trees met their final 5-year performance targets set forth in the TPP.

Monitoring and Reporting: The Planning Division maintains the approved TPP and all supporting documentation in the project file. The Resource Management Agency Operations Division maintains copies of all financial documentation. Planning Division staff, Building and Safety Inspectors, and Public Works Agency grading inspectors have the authority to inspect the site, in order to verify that tree protection measures remain in place during grading and construction activities, consistent with the requirements of the Ventura County Coastal Zoning Ordinance § 8183-5.

Mitigation Measure BIO-8: Tree Health Monitoring and Reporting

Purpose: To comply with the County's Tree Protection Regulations (TPR) set forth in § 8178-7 et seq. of the Ventura County CZO, and with the Oak Woodland Conservation Act (OWCA) (PRC § 21083.4, Fish and Game Code § 1361).

Requirement: The Permittee shall submit annual monitoring reports, including a figure showing the location of all planted replacement trees, prepared by a qualified arborist. After initiation of construction activities individual protected trees that are replaced shall be monitored for five years; transplanted protected trees shall be monitored for 10 years; and trees associated with oak woodlands shall be monitored for 7 years following the completion of construction activities. The annual reports shall include documentation on the success of tree protection measures and the overall condition of encroached-upon trees relative to their condition prior to the initiation of construction activities. If any trees are found to be in serious decline (e.g., "D" status, or "C" status if pre-construction status was "A"), the arborist's report must include a Damaged Tree Addendum to the TPP which recommends offsets and any associated additional monitoring.

Documentation: The Permittee shall provide to the Planning Division a signed contract (financial information redacted) with a qualified arborist responsible for preparing the annual tree health monitoring reports. The Permittee shall submit annual arborist reports as stated in the "Requirement" section of this condition (above).

Timing: The Permittee shall submit annual arborist reports as stated in the requirement section of this mitigation measure (above) after initiation of (construction activities.

Monitoring and Reporting: All planted replacement trees shall be monitored in accordance with this mitigation measure. The Planning Division shall verify that replacement trees will have at least a 70% survival rate after the required monitoring. If the survival rate is less than 70% after the required monitoring, the Permittee shall install replacement plantings until the 70% survival rate performance criteria is met. The Permittee shall implement any recommendations made by the arborist's Damaged Tree Addendum to the satisfaction of the Planning Director. The Planning Division maintains copies of all documentation and evidence that the arborist's recommendations are

implemented. The Planning Division has the authority to conduct periodic site inspections to ensure ongoing compliance with this condition consistent with the requirements of § 8183-5 of the Ventura County Coastal Zoning Ordinance.

Mitigation Measure BIO-9: Non-Native/Invasive Plant Species Control and Management Plan

Purpose: To reduce and/or eliminate the proliferation of invasive and non-native herbaceous vegetation from within the development envelope other than ornamental landscaped areas.

Requirement: A Non-Native/Invasive Plant Species Control and Management Plan shall be prepared by a qualified biologist or restoration specialist to reduce and/or eliminate the proliferation of invasive plant species during the construction and operational phases of the project. All invasive and non-native herbaceous vegetation shall be removed from within the development envelope before construction activities begin; the natural/undeveloped project areas outside the development envelope are excluded. Alternatively, invasive and non-native herbaceous vegetation shall be removed in sections to align with construction activity if phased development occurs. Initial vegetation removal will be conducted outside of the recognized nesting bird season. If initial vegetation removal must occur during the nesting season pre-construction nesting surveys will be required and may result in no work activity areas depending on buffers required for active nests. Control of invasive plant species will be overseen by individuals experienced with habitat restoration techniques and experienced with native-versus-non-native plant species.

Documentation: The Permittee shall provide to the Planning Division a signed contract (financial information redacted) with a County-approved qualified biologist or restoration specialist for review and approval.

The Non-Native/Invasive Plant Species Control and Management Plan shall emphasize control of novel introductions and species likely to invade wildlands. The Non-Native/Invasive Plant Species Control and Management Plan shall include, but not be limited to the following:

- Specific objectives;
- Weed survey and mapping methods and timing;
- Target species and problem areas;
- Prioritization of threats;
- Success criteria;
- Management strategies that would result in eradication and/or control of target species;
- Implementation plan;
- Monitoring plan; and,
- Adaptive management and contingency measures.

The following success criteria shall be incorporated:

- Absolute cover of targeted invasive species in treated areas shall be less than 25% by the end of the first year of treatment, less than 10% by the end of the second year of treatment, and less than 5% thereafter.
- The methods for evaluating whether the project has been successful at meeting the above-mentioned success criteria shall be determined by the County-approved qualified biologist or restoration specialist and included in the Plan.
- Invasive species surveys and monitoring shall be conducted at a minimum biannually (once in spring and once in summer) beginning prior to initial site preparation and then throughout the construction and operational phases for the first five years of occupancy. Treatments shall be conducted as necessary.

A log for each maintenance/weeding/herbicide event shall be kept at the project site that identifies species targeted, timing of activities, and methods used.

Annual reports shall be prepared by the County-approved qualified biologist or restoration specialist, that document surveys, methods, treatments, and monitoring, and evaluate whether success criteria have been met.

Timing: Prior to issuance of a Zoning Clearance for grading, the Permittee shall provide a signed contract with a qualified biologist or restoration specialist and submit the draft and final Non-Native/Invasive Plant Species Control and Management Plan to the Planning Division for review and approval. Implementation of the Non-Native/Invasive Plant Species Control and Management Plan shall begin prior to site preparation and continue throughout the construction and the first five years of occupancy. During the construction phase and for the first five years of occupancy, annual reports shall be prepared by the qualified biologist or restoration specialist and submitted by December 31, that document surveys, methods, treatments, and monitoring, and evaluate whether success criteria have been met.

Monitoring and Reporting: The Planning Division maintains copies of the signed contract, the Non-Native/Invasive Plant Species Control and Management Plan and the annual survey reports in the project file. The Planning Division has the authority to conduct periodic site inspections to ensure ongoing compliance with this condition consistent with the requirements of § 8183-5 of the Ventura County Coastal Zoning Ordinance.

Mitigation Measure BIO-10: Best Management Practices (BMPs)
Purpose: To avoid significant impacts to plant and wildlife species during construction, Best Management Practices (BMPs) shall be employed.

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

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

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

c. All construction equipment, staging areas, materials, and personnel shall remain within the perimeter of the disturbed area authorized under Coastal PD Permit No. PL21-0051.

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

e. Temporary signage on the project site to inform personnel and visitors of the above requirements.

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

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

Timing: Prior to the issuance of a Zoning Clearance for grading or land clearing activities, the Permittee must take the following actions:

- Install signage.
- Submit photo-documentation of the installation of the signage to the Planning Division.

Monitoring and Reporting: The Planning Division maintains copies of the signed photo-documentation in the project file. The Planning Division has the authority to conduct periodic site inspections to ensure ongoing compliance with this condition consistent with the requirements of § 8183-5 of the Ventura County Coastal Zoning Ordinance.

Mitigation Measure BIO 11: Washout Areas Near Environmentally Sensitive Habitat Areas (ESHA) and Little Sycamore Creek

Purpose: To avoid impacts to ESHA and Little Sycamore Creek from washing of construction equipment.

Requirement: During construction, the Permittee shall wash concrete trucks, paint, equipment, or conduct similar activities only in areas where polluted water and materials can be contained for subsequent removal from the site. The Permittee shall not discharge any wash water to storm drains, streets, drainage ditches, or ESHA to be protected. The Permittee shall ensure that areas designated for washing functions if possible be at least 100 feet from any storm drain or Little Sycamore Creek If the 100 feet distance is not possible designated areas shall be as far as possible from any storm drain or Little Sycamore Creek. The Permittee shall clearly designate location(s) of the washout area(s) at the construction site with signs. The Permittee shall identify the washout area(s) on the site and grading plans and submit the plans to the Planning Division for review and approval. The Permittee shall establish the washout area(s) prior to, and maintain the washout area(s) throughout, grading and construction.

Documentation: The Permittee shall identify the washout areas on the site and grading plans.

Timing: Prior to issuance of a Zoning Clearance for grading, the Permittee shall submit the site and grading plans to the Planning Division for review and approval.

Monitoring and Reporting: The Planning Division maintains copies of the final plans in the project file. The Planning Division has the authority to inspect the property during the development phase of the project to ensure that the washout area(s) are maintained as required. The Planning Division has the authority to conduct periodic site inspections to ensure ongoing compliance with this condition consistent with the requirements of § 8183-5 of the Ventura County Coastal Zoning Ordinance.

Mitigation Measure BIO-12: Restriction On The Use Of Anticoagulant Rodenticides

Purpose: To comply with Coastal Zoning Ordinance § 8178-2.8, Pesticides and Pest Management in the Coastal Zone, and to avoid significant impacts to non-target wildlife such as mountain lions and other large predators, which could be harmed by directly consuming poisoned bait or by consuming prey that have ingested anticoagulant rodenticides.

Requirement: Rodenticides containing any anticoagulant compounds including, but not limited to Warfarin, Brodifacoum, Bromadiolone, or Diphacinone shall not be used at the Camp, including the development envelope and fuel modification zones.

Documentation: The Permittee shall maintain a record of rodenticides used at the Camp including their labels.

Timing: The Permittee shall be in compliance with this condition throughout the life of the project.

Monitoring and Reporting: The Permittee shall provide a record of rodenticides used including their labels for review by Ventura County Planning, when requested. The Planning Division has the authority to conduct periodic site inspections to ensure ongoing compliance with this condition consistent with the requirements of § 8183-5 of the Ventura County Coastal Zoning Ordinance.

With the implementation of mitigation measures BIO-1 through BIO-12, and BIO-13 (noted in Section 4B, below) and BIO-17 and BIO-18 (noted in Section 4D, below), project specific impacts to special-species plants and animals will be less than significant, and the proposed project will not make a cumulatively considerable contribution to a significant cumulative impact to plants and animal species.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
4B. Ecological Communities - Sensitive Plant Communities								
Will the proposed project:								
1) Temporarily or permanently remove sensitive plant communities through construction, grading, clearing, or other activities?			X			X		
2) Result in indirect impacts from project operation at levels that will degrade the health of a sensitive plant community?			X			X		

Impact Discussion:

The project components are grouped for the purposes of calculating impacts to ecological communities into the following impact categories:

- Buildings/Structures/Grading
- Concrete/Asphalt/Pathways
- Fuel Modification
- Habitat/Creek Restoration
- Utilities

The footprint of each of these five impact categories is shown on Figures 11-1 through 11-6 in the ISBA.

Previously permitted structures and development, legal fuel modification zones around previously permitted structures, and all areas of legal vegetation disturbance prior to the effective date of the California Coastal Act that have remained in disturbed condition (i.e., the habitats have not recovered) serve as the baseline for the project for assessing impacts to ecological communities. The baseline footprint is shown on Figure 8-1 through 8-6 in the ISBA and is referred on the map legends as “Fuel Mod to Continue from Pre-Fire,” indicating that with development of the project these areas would continue to be maintained and would remain in disturbed condition. Direct impacts to ecological communities that would be potentially significant and require mitigation include the new impacts that extend beyond this baseline footprint.

The proposed project would primarily be sited within the baseline footprint, or previously developed and disturbed areas of the Camp, new fuel modification would impact previously undisturbed areas, including intact native habitats. Although the baseline footprint is previously developed or disturbed, project development within the baseline footprint includes changes in use and land cover when compared to the pre-existing pre-

fire condition. For example, structures are proposed at some locations which although previously developed or disturbed did not contain a structure. Figures 10-1 through 10-6 in the ISBA show the proposed structures and fuel modification zones overlain on the baseline footprint, including the footprints of pre-existing structures. In some cases, replacing pre-existing structures that were burned in the Woolsey Fire at substantially similar or at new locations as opposed to within pre-fire footprint would result in new fuel modification impacts to ESHAs and sensitive plant communities.

Figures 8-1 through 8-6 in the ISBA also show proposed fuel modification zones around proposed buildings as well as areas where the Ventura County Fire Department (VCFD) has determined no fuel modification or reduced fuel modification will be necessary, notwithstanding that these areas are within standard fuel modification distances from proposed buildings. These no maintenance fuel modification zones and 50% maintenance fuel modification zones will serve to avoid or reduce fuel modification impacts to ESHA in those areas. Areas of new fuel modification impact of the proposed project are shown on Figures 12-1 through 12-6 in the ISBA.

4B-1. *Temporarily or permanently remove sensitive plant communities through construction, grading, clearing, or other activities?*

Stantec performed plant community mapping of the Survey Area in 2020, 2021 and 2022 based on the State Vegetation Classification system employed by CDFW's Vegetation Classification and Mapping Program. Plant community Alliances and Associations as well as other land cover boundaries were mapped on aerial imagery in the field and further refined in the office using GIS mapping tools. There are 11 plant communities and land cover types within the Survey Area, which are described and shown on Figures 3-1 through 3-3 in the ISBA. Three of the plant communities within the Survey Area are sensitive including:

- California Sycamore – Coast Live Oak Woodland Alliance (*Platanus racemosa - Quercus agrifolia*) [Riparian]
- Coast Live Oak Woodland Alliance (*Quercus agrifolia*)
- California Encelia – Ashyleaf Buckwheat Shrubland Alliance (*Encelia californica – Eriogonum cinereum*)

Sensitive plant communities include those with Nature Serve global or state conservation status rankings of G1 through G3, or S1 through S3, as well as those that are otherwise designated as sensitive by CDFW. Sensitive plant communities are of limited distribution statewide or within a county or region and are often vulnerable to environmental effects of projects.

Sensitive plant communities also include oak woodlands, which are protected by the California Oak Woodlands Act of 2001 and are considered Locally Important Communities by the County of Ventura. Consistent with the California Oak Woodlands Act and the County's Oak Woodland Management Plan, the mapped oak woodlands at the site contain at least 10% canopy cover of oak tree species. Each oak woodland within

the Survey Area was evaluated and identified by Stantec biologists as in intact or disturbed, i.e., degraded, condition. The California Sycamore – Coast Live Oak Woodland Alliance and Coast Live Oak Woodland Alliance sensitive plant communities within the Survey Area occur in both intact and disturbed condition.

The project footprint is shown overlain on the plant communities within the Survey Area on Figures 3-1 through 3-3 in the ISBA. Permanent direct impacts to sensitive plant communities would result from grading, fuel modification, and construction of buildings, other structures, paved roads, hardscape, and pathways, which would remove vegetation, disturb soils, and potentially remove native seed banks. The acreage of each sensitive plant community that would be permanently and directly impacted by the project is provided in **Table 4-6, ESHA and Sensitive Plant Communities – New Permanent Impacts to Previously Undisturbed Areas.** Temporary direct impacts to sensitive plant communities would result from grading, utility installation, stream and habitat restoration, and temporary construction disturbance, which would also remove vegetation, disturb soils, and remove native seed banks. The acreage of sensitive plant communities that would be temporarily and directly impacted by the project is provided in **Table 4-7, ESHA and Sensitive Plant Communities – New Temporary Impacts to Previously Undisturbed Areas.** These include new impacts to sensitive plant communities in areas that are not within the baseline footprint, or previously developed and disturbed areas of the Camp. Permanent and temporary direct impacts to sensitive plant communities would be significant, but mitigable impacts.

California Sycamore – Coast Live Oak Woodland Alliance [Riparian], Coast Live Oak Woodland Alliance, and California Encelia – Ashyleaf Buckwheat Shrubland Alliance sensitive plant communities as well as all other native plant communities and one non-native plant community within the Survey Area also qualify as ESHA under the California Coastal Act and the County CZO. Impacts to ESHA are addressed under Section 4D: Ecological Communities – ESHA. Potential impacts to rare plant species would be mitigated by implementation of mitigation measure BIO-13 and the requirement for a qualified biologist to conduct rare plant surveys. With implementation of mitigation measures BIO-1, BIO-7 through BIO-11, BIO-13 through BIO-18, and BIO-20, potential permanent and temporary direct impacts to sensitive plant communities would be reduced to a less than significant level (**Class II**). Mitigation measures BIO-1, BIO-7 through BIO-11, BIO-15 through BIO-18, and BIO-20 require construction exclusionary fencing, pre-construction surveys and biological monitoring throughout construction, environmental awareness training for project personnel, implementation of BMPs, tree protection plans and monitoring, and preparation of an ESHA mitigation plan to compensate for impacts to sensitive plant communities / ESHAs at the project site.

As discussed earlier in this section, Section 21083.4 of the Public Resource Code requires a county to mitigate for significant environmental effects of conversion of oak woodlands, and the oak woodlands that would be significantly impacted by the project are subject to ESHA mitigation requirements of the County CZO. The ESHA mitigation required by the County CZO (see mitigation measure BIO-17 in section 4D below) will also satisfy the oak woodland mitigation requirements of Section 21083.4.

The acreages of direct impacts to disturbed sensitive plant communities within the baseline footprint, or previously developed and disturbed areas at the Camp, are also provided in **Table 4-8, Sensitive Plant Communities – Impacts within Baseline Footprint**. Mitigation is not required for direct impacts to the disturbed sensitive plant communities within the baseline footprint, which primarily include impacts to the understories of woodland communities that are already developed or highly disturbed.

4B-2. *Result in indirect impacts from project operation at levels that will degrade the health of a sensitive plant community?*

The CDFW sensitive plant communities within the Survey Area are also ESHAs. See Section 4D: Ecological Communities – ESHA for a discussion of the potential indirect impacts of project operation on the CDFW sensitive plant communities and ESHAs at the project site.

Table 4-6
ESHA and Sensitive Plant Communities – New Permanent Impacts to Previously Undisturbed Areas

Ecological Community	Sensitive Community Status	Total Acres in Survey Area	Acreage of New Impacts					
			Fuel Modification	Habitat & Creek Restoration	Buildings, Structures, and Grading	Utilities	Concrete, Asphalt, and Pathways	Total Impact
California Sycamore – Coast Live Oak Woodland Alliance (*Platanus racemosa - Quercus agrifolia*)	G3S3 / LIC / ESHA	7.42	0.015	--	0.009	--	0.028	**0.052**
California Sycamore – Coast Live Oak Woodland Alliance (*Platanus racemosa - Quercus agrifolia*) [Disturbed]	G3S3 / LIC / ESHA	0.93	--	--	--	--	--	**--**
Coast Live Oak Woodland Alliance (*Quercus agrifolia*)	LIC / CalOWA / ESHA	2.96	0.099	--	--	--	0.003	**0.102**
Coast Live Oak Woodland Alliance (*Quercus agrifolia*) [Disturbed]	LIC / CalOWA / ESHA	3.10	0.068	--	0.056	--	0.082	**0.206**
Laurel Sumac Shrubland Alliance (*Malosma laurina*)	ESHA	15.55	0.378	--	<0.001	--	0.013	**0.391**
Bush Mallow Shrubland Alliance (*Malacothamnus fasciculatus*)	ESHA	7.42	0.078	--	<0.001	--	0.005	**0.083**
California Encelia – Ashyleaf Buckwheat Shrubland Alliance (*Encelia californica* –	G2G3/S2S3 / LIC / ESHA	152.83	1.616	--	0.067	--	0.009	**1.692**

Ecological Community	Sensitive Community Status	Total Acres in Survey Area	Acreage of New Impacts					
			Fuel Modification	Habitat & Creek Restoration	Buildings, Structures, and Grading	Utilities	Concrete, Asphalt, and Pathways	Total Impact
Eriogonum cinereum)								
Eucalyptus spp. Woodland Semi-Natural Alliance	ESHA	1.20	0.021	--	--	--	--	**0.021**
Quailbush Shrubland Alliance (*Atriplex lentiformis*)	ESHA	2.96	--	--	--	--	--	**--**
Little Sycamore Creek	ESHA	--	0.024	--	0.103	--	0.084	**0.211**
Other Ephemeral Streams	ESHA	--	See Table 4-9 for new permanent impacts to ephemeral stream ESHAs.					
TOTAL ACREAGE*		**194.37**	**2.299**	**--**	**0.235**	**--**	**0.224**	**2.758**

* Does not include impacted acreage of ephemeral stream ESHAs. See Table 4.9 CDFW Jurisdictional Waters and Habitat columns for acreage of new permanent impacts to ephemeral stream ESHAs.

Nature Serve Global Ranking
The global rank (G-rank) is a reflection of the overall status of a plant community throughout its global range. Both Global and State ranks represent a letter + number score that reflects a combination of Rarity, Threat and Trend factors, with weighting being heavier on Rarity than the other two.

G1 - Critically Imperiled—At very high risk of extinction due to extreme rarity (often 5 or fewer occurrences), very steep declines, or other factors.
G2 - Imperiled—At high risk of extinction due to very restricted range, very few occurrences (often 20 or fewer), steep declines, or other factors.
G3 - Vulnerable—At moderate risk of extinction due to a restricted range, relatively few occurrences (often 80 or fewer), recent and widespread declines, or other factors.
G4 - Apparently Secure—Uncommon but not rare; some cause for long-term concern due to declines or other factors.
G5 - Secure—Common; widespread and abundant.
Nature Serve State Ranking
The state rank (S-rank) is assigned much the same way as the global rank, but state ranks refer to the imperilment status only within California's state boundaries.

S1 - Critically Imperiled—Critically imperiled in the state because of extreme rarity (often 5 or fewer occurrences) or because of factor(s) such as very steep declines making it especially vulnerable to extirpation from the state.
S2 - Imperiled—Imperiled in the state because of rarity due to very restricted range, very few occurrences (often 20 or fewer), steep declines, or other factors making it very vulnerable to extirpation from the state.
S3 - Vulnerable—Vulnerable in the state due to a restricted range, relatively few occurrences (often 80 or fewer), recent and widespread declines, or other factors making it vulnerable to extirpation from the state.
S4 - Apparently Secure—Uncommon but not rare in the state; some cause for long-term concern due to declines or other factors.
S5 - Secure—Common, widespread, and abundant in the state.

ESHA – Environmentally Sensitive Habitat Area
LIC – Ventura County Locally Important Community
Cal OWA – Protected by the California Oak Woodlands Act

Table 4-7
ESHA and Sensitive Plant Communities – New Temporary Impacts to Previously Undisturbed Areas

Ecological Community	Sensitive Status*	Total Acres in Survey Area	Acreage of New Impacts					
			Fuel Modification	Habitat & Creek Restoration	Buildings, Structures, and Grading	Utilities	Concrete, Asphalt, and Pathways	Total Impact
California Sycamore – Coast Live Oak Woodland Alliance (*Platanus racemosa - Quercus agrifolia*)	G3S3 / LIC / ESHA	7.42	--	1.820	0.167	--	--	**1.987**
California Sycamore – Coast Live Oak Woodland Alliance (*Platanus racemosa - Quercus agrifolia*) [Disturbed]	G3S3 / LIC / ESHA	0.93	--	0.005	<0.001	--	--	**0.005**
Coast Live Oak Woodland Alliance (*Quercus agrifolia*)	LIC / Cal OWA / ESHA	2.96	--	0.001	0.007	--	--	**0.008**
Coast Live Oak Woodland Alliance (*Quercus agrifolia*) [Disturbed]	LIC / Cal OWA / ESHA	3.10	--	0.270	0.090	--	--	**0.360**
Laurel Sumac Shrubland Alliance (*Malosma laurina*)	ESHA	15.55	--	0.002	0.068	0.007	--	**0.077**
Bush Mallow Shrubland Alliance (*Malacothamnus fasciculatus*)	ESHA	7.42	--	--	0.032	0.026	--	**0.058**
California Encelia – Ashyleaf Buckwheat Shrubland Alliance (*Encelia californica – Eriogonum cinereum*)	G2G3 S2S3 / LIC / ESHA	152.83	--	0.005	0.022	0.083	--	**0.110**
Eucalyptus spp. Woodland Semi-Natural Alliance	ESHA	1.20	--	0.082	0.002	--	--	**0.084**
Quailbush Shrubland Alliance (*Atriplex lentiformis*)	ESHA	2.96	--	--	--	--	--	**0.00**
Little Sycamore Creek	ESHA	--	--	2.337	0.231	--	--	**2.568**
Ephemeral Streams	ESHA	--	See Table 4-10 for new temporary impacts to ephemeral stream ESHAs.					
TOTAL ACREAGE*		**194.37**	**--**	**4.522**	**0.388**	**0.116**	**--0.000**	**5.026**

Ecological Community	Sensitive Status*	Total Acres in Survey Area	Acreage of New Impacts					
			Fuel Modification	Habitat & Creek Restoration	Buildings, Structures, and Grading	Utilities	Concrete, Asphalt, and Pathways	Total Impact

* Does not include impacted acreage of ephemeral stream ESHAs. See Table 4-10 CDFW Jurisdictional Waters and Habitat columns for acreage of new temporary impacts to ephemeral stream ESHAs.

Nature Serve Global Ranking
The global rank (G-rank) is a reflection of the overall status of a plant community throughout its global range. Both Global and State ranks represent a letter + number score that reflects a combination of Rarity, Threat and Trend factors, with weighting being heavier on Rarity than the other two.

G1 - Critically Imperiled—At very high risk of extinction due to extreme rarity (often 5 or fewer occurrences), very steep declines, or other factors.
G2 - Imperiled—At high risk of extinction due to very restricted range, very few occurrences (often 20 or fewer), steep declines, or other factors.
G3 - Vulnerable—At moderate risk of extinction due to a restricted range, relatively few occurrences (often 80 or fewer), recent and widespread declines, or other factors.
G4 - Apparently Secure—Uncommon but not rare; some cause for long-term concern due to declines or other factors.
G5 - Secure—Common; widespread and abundant.
Nature Serve State Ranking
The state rank (S-rank) is assigned much the same way as the global rank, but state ranks refer to the imperilment status only within California's state boundaries.

S1 - Critically Imperiled—Critically imperiled in the state because of extreme rarity (often 5 or fewer occurrences) or because of factor(s) such as very steep declines making it especially vulnerable to extirpation from the state.
S2 - Imperiled—Imperiled in the state because of rarity due to very restricted range, very few occurrences (often 20 or fewer), steep declines, or other factors making it very vulnerable to extirpation from the state.
S3 - Vulnerable—Vulnerable in the state due to a restricted range, relatively few occurrences (often 80 or fewer), recent and widespread declines, or other factors making it vulnerable to extirpation from the state.
S4 - Apparently Secure—Uncommon but not rare in the state; some cause for long-term concern due to declines or other factors.
S5 - Secure—Common, widespread, and abundant in the state.

ESHA – Environmentally Sensitive Habitat Area
LIC – Ventura County Locally Important Community.
Cal OWA – Protected by the California Oak Woodlands Act

Table 4-8
Sensitive Plant Communities – Impacts within Baseline Footprint

Ecological Community	Sensitive Community Status	Total Acres in Survey Area	Acreage of Project Impacts					
			Fuel Modification	Habitat & Creek Restoration	Buildings, Structures, and Grading	Utilities	Concrete, Asphalt, and Pathways	Total
California Sycamore – Coast Live Oak Woodland Alliance (*Platanus racemosa - Quercus agrifolia*)	G3S3 / LIC / ESHA	7.42	0.272	--	0.754	0.008	1.227	**2.261**
California Sycamore – Coast Live Oak Woodland Alliance (*Platanus racemosa - Quercus agrifolia*) [Disturbed]	G3S3 / LIC / ESHA	0.93	0.121	--	0.238	--	0.518	**0.877**
Coast Live Oak Woodland Alliance (*Quercus agrifolia*)	LIC / CalOWA / ESHA	2.96	0.150	--	0.190	<0.001	0.064	**0.404**
Coast Live Oak Woodland Alliance (*Quercus agrifolia*) [Disturbed]	LIC / CalOWA / ESHA	3.10	0.357	--	0.626	--	0.334	**1.317**
Laurel Sumac Shrubland Alliance (*Malosma laurina*)	ESHA	15.55	1.184	--	0.126	0.007	0.047	**1.364**
Bush Mallow Shrubland Alliance (*Malacothamnus fasciculatus*)	ESHA	7.42	0.613	--	0.023	0.009	0.010	**0.655**
California Encelia – Ashyleaf Buckwheat Shrubland Alliance (*Encelia californica – Eriogonum cinereum*)	G2G3/S2S3/ LIC / ESHA	152.83	5.385	--	0.251	0.027	0.063	**5.726**
Eucalyptus spp. Woodland Semi-Natural Alliance	ESHA	1.20	0.410	--	0.283	0.001	0.184	**0.878**
Quailbush Shrubland Alliance (*Atriplex lentiformis*)	ESHA	2.96	--	--	--	--	--	--
TOTAL ACREAGE		**194.37**	**8.492**	**--**	**2.491**	**0.052**	**2.447**	**13.482**

Ecological Community	Sensitive Community Status	Total Acres in Survey Area	Acreage of Project Impacts					
			Fuel Modification	Habitat & Creek Restoration	Buildings, Structures, and Grading	Utilities	Concrete, Asphalt, and Pathways	Total

Nature Serve Global Ranking
The global rank (G-rank) is a reflection of the overall status of a plant community throughout its global range. Both Global and State ranks represent a letter + number score that reflects a combination of Rarity, Threat and Trend factors, with weighting being heavier on Rarity than the other two.

G1 - Critically Imperiled—At very high risk of extinction due to extreme rarity (often 5 or fewer occurrences), very steep declines, or other factors.
G2 - Imperiled—At high risk of extinction due to very restricted range, very few occurrences (often 20 or fewer), steep declines, or other factors.
G3 - Vulnerable—At moderate risk of extinction due to a restricted range, relatively few occurrences (often 80 or fewer), recent and widespread declines, or other factors.
G4 - Apparently Secure—Uncommon but not rare; some cause for long-term concern due to declines or other factors.
G5 - Secure—Common; widespread and abundant.
Nature Serve State Ranking
The state rank (S-rank) is assigned much the same way as the global rank, but state ranks refer to the imperilment status only within California's state boundaries.

S1 - Critically Imperiled—Critically imperiled in the state because of extreme rarity (often 5 or fewer occurrences) or because of factor(s) such as very steep declines making it especially vulnerable to extirpation from the state.
S2 - Imperiled—Imperiled in the state because of rarity due to very restricted range, very few occurrences (often 20 or fewer), steep declines, or other factors making it very vulnerable to extirpation from the state.
S3 - Vulnerable—Vulnerable in the state due to a restricted range, relatively few occurrences (often 80 or fewer), recent and widespread declines, or other factors making it vulnerable to extirpation from the state.
S4 - Apparently Secure—Uncommon but not rare in the state; some cause for long-term concern due to declines or other factors.
S5 - Secure—Common, widespread, and abundant in the state.

ESHA – Environmentally Sensitive Habitat Area
LIC – Ventura County Locally Important Community
Cal OWA – Protected by the California Oak Woodlands Act

Mitigation/Residual Impact(s)

Mitigation Measure BIO-13: Focused Rare Plant Surveys
Purpose: To survey for and avoid, minimize, and/or mitigate impacts to listed and other special-status plant populations.

Requirement: The Permittee shall retain a County-approved qualified biologist/botanist to conduct focused floristic surveys within the construction envelope and a 100-ft buffer where accessible in the spring/summer prior to the start of construction. A minimum of three surveys shall be conducted and timed to account for the variance in blooming periods for special-status plants known or with the potential to occur in the survey area. All occurrences of special-status plants will be mapped and occurrences within 100 feet of the project activities flagged in the field. A minimum of a 25-foot buffer shall be placed around all known locations of special-status species within 100-feet of project activities to avoid potential impacts to seed banks and microhabitats that support the species. These buffers shall be flagged/fenced and avoided during construction. All occurrences of federal or state listed species will be avoided. If a federally or state listed species cannot be avoided consultation with the USFWS, CDFW, and the County will be required before site disturbing activities can occur.

Occurrences of CRPR species will be avoided to the extent possible. If CRPR species cannot be avoided, then the loss of the special-status plant species shall be offset by onsite or offsite salvage/replanting and/or propagation of the species at a 2:1 ratio. The location and number of plants that would be impacted by the project shall be determined by a qualified biologist. The 2:1 ratio to compensate for the loss of the perennial species shall be based on the numbers of individuals impacted, and the 2:1 ratio to compensate for the loss of the annual species shall be based on the impacted acreage occupied by the species, including the individual plants and the seedbank. The mitigation site shall be preserved in perpetuity.

Documentation: The Permittee shall provide to the Planning Division a signed contract (financial information redacted) with a County-approved qualified biologist/botanist to conduct focused rare plant surveys and prepare the required survey report. The survey report shall be prepared and submitted to the Planning Division for review and approval. The report shall include, at a minimum, a description of survey methodologies, a compendium of all species observed, and detailed GIS based maps showing locations of all mapped species. A species compendium shall be kept during each survey event and submeter GPS locations taken for each individual or population of special-status plant(s) observed. If mitigation is required to offset impacts to special-status plant species, the Permittee shall submit to the Planning Division a Habitat Restoration Plan (HRP), Habitat Maintenance and Monitoring Plan (HMMP), and Habitat Management Plan (HMP) that provides for the replacement of the special-status plant species impacted by the project. All mitigation sites shall be permanently protected through a conservation easement or deed restriction that permanently protects the mitigation site in its natural state. The details, requirements, and methodology for salvage/planting/propagation of species shall be detailed/included in the Habitat Restoration Plan (HRP), Habitat Maintenance and

Monitoring Plan (HMMP), and Habitat Management Plan (HMP) required as part of the ESHA Mitigation Plan (see mitigation measure BIO-17).

Mapped Information: A map with avoidance buffers for all occurrences of special-status plants will be provided to the on-site construction personnel.

Timing: Prior to issuance of a Zoning Clearance for grading, the Permittee shall provide a signed contract with a qualified biologist responsible for conducting plant surveys and preparing the Habitat Restoration Plan (HRP), Habitat Maintenance and Monitoring Plan (HMMP), and Habitat Management Plan (HMP). The County-approved qualified biologist/botanist shall conduct focused floristic surveys in the spring/summer prior to the start of construction. If construction extends into multiple years, then the surveys shall be done each survey year prior to the commencement of work in accordance with the approved Habitat Restoration Plan (HRP), Habitat Maintenance and Monitoring Plan (HMMP), and Habitat Management Plan (HMP).

Monitoring and Reporting: The Planning Division maintains copies of the signed contract and the survey reports in the project file. The Planning Division has the authority to conduct periodic site inspections to ensure ongoing compliance with this condition consistent with the requirements of § 8183-5 of the Ventura County Coastal Zoning Ordinance.

With the implementation of mitigation measures BIO-13, and BIO-1, and BIO-7 through BIO-11, (noted in Section 4A, above), BIO-15 and BIO-16 (noted in Section 4C, below) and BIO-17, BIO-18, and BIO-20 (noted in Section 4D below), project specific impacts to sensitive plant communities will be less than significant, and the proposed project will not make a cumulatively considerable contribution to a significant cumulative impact to sensitive plant communities.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
4C. Ecological Communities - Waters and Wetlands								
Will the proposed project:								

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
1) Cause any of the following activities within waters or wetlands: removal of vegetation; grading; obstruction or diversion of water flow; change in velocity, siltation, volume of flow, or runoff rate; placement of fill; placement of structures; construction of a road crossing; placement of culverts or other underground piping; or any disturbance of the substratum?			X			X		
2) Result in disruptions to wetland or riparian plant communities that will isolate or substantially interrupt contiguous habitats, block seed dispersal routes, or increase vulnerability of wetland species to exotic weed invasion or local extirpation?			X			X		
3) Interfere with ongoing maintenance of hydrological conditions in a water or wetland?		X				X		
4) Provide an adequate buffer for protecting the functions and values of existing waters or wetlands?			X			X		

Impact Discussion:

Stantec conducted a desktop review of the USFWS National Wetlands Inventory for surface waters and wetlands previously mapped within the Survey Area and vicinity. Following the desktop review, Stantec performed a field delineation in 2020 to identify wetlands, waters, and riparian habitat under the regulatory jurisdiction of the United States Army Corps of Engineers (USACE), Regional Water Quality Control Board (RWQCB), and/or CDFW. The field delineation followed standard protocols for delineating wetland and non-wetland waters of the United States, waters of the State, and jurisdictional riparian habitat. During the field investigation, potential jurisdictional features that were accessible were examined for ordinary high-water marks, riparian vegetation, and wetland indicators including hydrophytic vegetation, hydric soils, and wetland hydrology.

There are several jurisdictional streams within the Survey Area, which are discussed and shown on Figures 4-1 through 4-6 in the ISBA. All streams shown on Figures 4-1 through 4-6 are expected to be regulated under the jurisdiction of RWQCB as waters of the State and CDFW jurisdictional waters and habitat. Most of these streams are unnamed, occur

on steep hillsides, and would only flow during rain events. These streams are ephemeral and do not support wetland habitats. Based on the most current revised definition of waters of the United States, effective September 8, 2023, the USACE is not taking jurisdiction over ephemeral streams, and thus the ephemeral streams at the site are not considered to be under USACE jurisdiction.

The major creek corridor at the project site is Little Sycamore Creek, which runs in a general north to south direction through the Camp Hess Kramer Lower and Middle Camps and discharges to the Pacific Ocean. Little Sycamore Creek is an intermittent stream that supports well established riparian communities such as California sycamore and coast live oak woodlands. Little Sycamore Creek is under the regulatory jurisdiction of USACE as non-wetland waters of the United States, RWQCB as waters of the State, and CDFW as jurisdictional waters and riparian habitat. Little Sycamore Creek does not contain USACE wetlands but large portions of the channel and associated riparian habitat meet criteria as single-parameter wetlands under the California Coastal Act. The wetlands associated with Little Sycamore Creek are significant wetland habitats, and therefore pursuant to Ventura County General Plan Policy 1.5.2-4 a buffer is required between these wetlands and discretionary development. The standard wetland buffer required by General Plan Policy 1.5.2-4 is 100 feet. The ephemeral streams at the site are not significant wetland habitats per the County General Plan. Little Sycamore Creek is also a red-line stream under jurisdiction of the Ventura County Watershed Protection District for flood control purposes.

Streams including associated wetlands and riparian habitats support disproportionate abundance and diversity of wildlife species compared to adjacent upland habitats, and they also provide important ecological services. As discussed under Section 4D, below, all the streams within the Survey Area are wet environments that qualify as intermittent or ephemeral stream ESHAs under the County CZO. As discussed in Section 4D, according to the County's CZO stream ESHAs require a 100-foot buffer zone to protect their resource functions and values from human disturbance.

4C-1. *Cause any of the following activities within waters or wetlands: removal of vegetation; grading; obstruction or diversion of water flow; change in velocity, siltation, volume of flow, or runoff rate; placement of fill; placement of structures; construction of a road crossing; placement of culverts or other underground piping; or any disturbance of the substratum?*

W1 – Little Sycamore Creek

Following the Woolsey Fire in 2018, Little Sycamore Creek was inundated with a significant amount of mud, debris, and flood water that filled and overflowed the channel, depositing mud and debris across much of the middle and lower camps. To avoid future similar disasters and to improve conditions along Little Sycamore Creek, the proposed project includes a stream restoration project consisting of bank reconstruction and reinforcement as well as expansion of the riparian corridor and restoration of riparian habitats along 4,329 linear feet of the stream. The stream restoration project would

include excavating and removing remaining flood-deposited sediment and debris from the channel and adjacent areas; re-establishing channel floodplain connections; laying back, stabilizing, and revegetating banks; installing channel grade control structures; preserving mature trees; integrating stormwater measures; replacing undersized bridges; and planting native riparian vegetation within the expanded riparian corridor.

The earthwork phase of the stream restoration would involve heavy equipment and would require removal of fill and existing plant material except for trees, which would be protected in place. At the time of biological surveys conducted for the project, vegetation along the channel consisted primarily of non-native herbaceous species, as stream habitats are still recovering from the Woolsey Fire. The overall stream restoration would include the restoration of approximately 2.87 acres of riparian habitat. Restoration plantings would be installed in two general zones including the floodplain and riparian bank. The floodplain would include in-stream native wetland species and the banks would include a variety of wetland and riparian species. The species on the provisional plant palette for planting along the stream are California native plants. Disturbed areas would be protected with erosion control measures throughout the 4,329 linear feet of restoration area and a temporary dewatering and water control plan would be prepared to support in-channel construction activities, which would also be required by resource agency permits that would need to be obtained to complete the restoration project. The duration of the stream channel restoration would be approximately 20 weeks for the section at Lower Camp and 20 weeks for the section at Middle Camp. The planting for the riparian habitat restoration is estimated to take 8 to 10 weeks to complete, and establishment of riparian habitat is estimated to take 3 to 5 years.

The stream restoration project would result in grading; removal of vegetation; temporary diversion of stream flow; changes in velocity, siltation, volume of flow, or runoff rate; placement of fill; placement of structures; construction of bridge crossings over the creek; placement of storm drains; and disturbance of the stream substratum at some locations. Additional impacts to Little Sycamore Creek would be caused by new fuel modification and shading of habitat by proposed bridges. The acres of new direct permanent and temporary impacts to Little Sycamore Creek as well as the cause of the impacts are provided in **Table 4-9, Permanent Impacts to Waters and Wetlands** and in **Table 4-10, Temporary Impacts to Waters and Wetlands**.

The proposed project would permanently impact 0.03 acres of non-wetland waters of the United States, 0.02 acres of RWQCB waters of the State, 0.19 acres of CDFW jurisdictional waters and riparian habitat, and 0.21 acres of CCC single-parameter wetland habitat within Little Sycamore Creek. These are the total acreages of impact and therefore include overlap in agency jurisdiction. The permanent impacts would be caused by construction of rock toe slope protection along stream banks and at bridges, storm drain outlets, riprap protection at storm drain outlets, boulder energy dissipation structures, and boulder weir structures, as well as new fuel modification. The proposed new storm drains, and storm drain outlets are to resolve historic drainage issues across the site and meet current requirements related to project-related stormwater. These outlets occur in eight locations across the stream. Permanent impacts would also be

caused by shading of habitat from a new bridge, bridge widening, and previously existing bridges that were burned in the Woolsey Fire that would be installed at new locations. The abutments of proposed bridges would be located outside the banks of the stream. These permanent changes to Little Sycamore Creek would be significant, but mitigable impacts.

Table 4-9
Permanent Impacts to Waters and Wetlands

Jurisdictional Streams/Stream ESHAs	Status	Acreage of New Impact								Cause of Impact
		USACE Non-Wetland Waters of the United States		RWQCB Waters of the State		CDFW Jurisdictional Waters and Habitat		CCC Single-Parameter Wetlands		
		Habitat & Creek Restoration	Grading / Structures / Utilities / Fuel Modification	Habitat & Creek Restoration	Grading / Structures / Utilities / Fuel Modification	Habitat & Creek Restoration	Grading / Structures / Utilities / Fuel Modification	Habitat & Creek Restoration	Grading / Structures / Utilities / Fuel Modification	
W1 Little Sycamore Creek	USACE/ RWQCB / CDFW/ CCC/ County/ WPD/ ESHA	--	0.03	--	0.02	--	0.19	--	0.21	- Rock Toe Slope Protection - Storm Drain Outlets & Riprap - Velocity Dissipators - Boulder Weirs - Shading of Habitat by Bridges - Fuel Modification
W2 Ephemeral Stream	RWQCB / CDFW/ ESHA	--	--	--	0.01	--	0.01	--	--	- Fuel Modification
W4 Ephemeral Stream	RWQCB / CDFW/ ESHA	--	--	--	<0.01	--	<0.01	--	--	- Fuel Modification (50%)
W5 Ephemeral Stream	USACE/ RWQCB / CDFW/ ESHA	--	--	--	0.02	--	0.02	--	--	- Grading - Detention Basin - Culverts
W5A Ephemeral Stream	RWQCB / CDFW/ ESHA	--	--	--	<0.01	--	<0.01	--	--	- Grading - Culvert
W12 Ephemeral Stream	RWQCB / CDFW/ ESHA	--	--	--	<0.01	--	<0.01	--	--	- Fuel Modification
TOTAL ACREAGE		**--**	**0.03**	**--**	**0.05+**	**--**	**0.22+**	**--**	**0.21**	

Jurisdictional Streams/Stream ESHAs	Status	Acreage of New Impact								Cause of Impact
		USACE Non-Wetland Waters of the United States		RWQCB Waters of the State		CDFW Jurisdictional Waters and Habitat		CCC Single-Parameter Wetlands		
		Habitat & Creek Restoration	Grading / Structures / Utilities / Fuel Modification	Habitat & Creek Restoration	Grading / Structures / Utilities / Fuel Modification	Habitat & Creek Restoration	Grading / Structures / Utilities / Fuel Modification	Habitat & Creek Restoration	Grading / Structures / Utilities / Fuel Modification	
USACE – Waters of the United States under Jurisdiction of Army Corp of Engineers. RWQCB – Waters of the State under Jurisdiction of the Regional Water Quality Control Board. CDFW – Streambed and Riparian Habitat under Jurisdiction of the California Department of Fish and Wildlife. CCC – Single-Parameter Wetlands per California Coastal Act and County Local Coastal Program. County – Wetland protected per County General Plan. WPD – Red-line stream under jurisdiction of Ventura County Watershed Protection District for flood control. ESHA – Environmentally Sensitive Habitat Area per County Local Coastal Program.										

Table 4-10
Temporary Impacts to Waters and Wetlands

Jurisdictional Stream /Stream ESHAs	Status	Acreage of New Impact								Cause of Impact
		USACE Non-Wetland Waters of the United States		RWQCB Waters of the State		CDFW Jurisdictional Waters and Habitat		CCC Single-Parameter Wetlands		
		Habitat & Creek Restoration	Grading / Structures / Utilities	Habitat & Creek Restoration	Grading / Structures / Utilities	Habitat & Creek Restoration	Grading / Structures / Utilities /	Habitat & Creek Restoration	Grading / Structures / Utilities /	
W1 Little Sycamore Creek	USACE/ RWQCB/ CDFW/ CCC/ County / ESHA	0.82	0.12	1.29	0.11	3.11	0.40	2.34	0.23	- Grading and Revegetation for Creek Restoration - Temporary Disturbance from Construction Activities - Reconstruction & Replacement of Bridges - Installation of Storm Drains
W1A Ephemeral Stream	RWQCB / CDFW/ ESHA	--	--	<0.01	--	<0.01	--	--	--	Creek Revegetation
W4	RWQCB	--	--	--	<0.01	--	<0.01	--	--	Grading

Jurisdictional Stream /Stream ESHAs	Status	Acreage of New Impact								Cause of Impact
		USACE Non-Wetland Waters of the United States		RWQCB Waters of the State		CDFW Jurisdictional Waters and Habitat		CCC Single-Parameter Wetlands		
		Habitat & Creek Restoration	Grading / Structures / Utilities	Habitat & Creek Restoration	Grading / Structures / Utilities	Habitat & Creek Restoration	Grading / Structures / Utilities /	Habitat & Creek Restoration	Grading / Structures / Utilities /	
Ephemeral Stream	/ CDFW/ ESHA									
W5 Ephemeral Stream	USACE/ RWQCB / CDFW/ ESHA	--	--	--	<0.01	--	<0.01	--	--	Grading & Culverts
W5A Ephemeral Stream	RWQCB / CDFW/ ESHA	--	--	--	<0.01	--	<0.01	--	--	Grading & Culvert
W6 Ephemeral Stream	RWQCB / CDFW/ ESHA	--	--	--	<0.01	--	<0.01	--	--	Grading
W6B Ephemeral Stream	RWQCB / CDFW/ ESHA	--	--	--	<0.01	--	<0.01	--	--	Utilities
W6C Ephemeral Stream	RWQCB / CDFW/ ESHA	--	--	--	<0.01	--	<0.01	--	--	Grading
TOTAL ACREAGE		**0.82**	**0.12**	**1.29**	**0.11+**	**3.11**	**0.40+**	**2.34**	**0.23**	
USACE – Waters of the United States under Jurisdiction of Army Corp of Engineers. RWQCB – Waters of the State under Jurisdiction of the Regional Water Quality Control Board. CDFW – Streambed and Riparian Habitat under Jurisdiction of the California Department of Fish and Wildlife. CCC – Single-Parameter Wetlands per California Coastal Act and County Local Coastal Program. County – "Red-line" stream under the jurisdiction of Ventura County Watershed Protection District for flood control. ESHA – Environmentally Sensitive Habitat Area per County Local Coastal Program.										

The proposed project would also temporarily impact a total of 0.94 acres of non-wetland waters of the United States, 1.40 acres of RWQCB waters of the State, 3.51 acres of CDFW jurisdictional waters and riparian habitat, and 2.57 acres of CCC single-parameter wetland habitat within Little Sycamore Creek. These are the total acreages of impact and therefore include overlap in agency jurisdiction. These temporary impacts would primarily be caused by grading for stream bank reconstruction and revegetation of riparian habitats, which if successful would be a beneficial action that would generally improve conditions and habitats for biological resources along the stream. Temporary impacts would also be caused by temporary disturbance from construction activities, installation of storm drains, and reconstruction and replacement of bridges. There would be a temporary loss and reduction of riparian habitat following stream grading and reconstruction as the restored habitat becomes established. These temporary disturbances to Little Sycamore Creek would be significant, but mitigable impacts.

The stream restoration project would change the hydrology and ecological conditions along the stream channel relative to the existing condition. The restoration project is

designed with the intention of achieving a stable and self-maintaining creek that would exist in a state of dynamic equilibrium, where it is properly transporting both water and sediment in a balanced manner, neither leading to excessive erosion nor deposition throughout the restored stream channel. The restoration project includes a series of structures that will encourage pool-riffle morphology as well as site scale sand and gravel deposition and shaded channel conditions. If successful, channel improvements would therefore result in a more stable environment with less natural disturbances to riparian habitats and associated wildlife, such as scour and sedimentation. The shaded pools would be distributed over the restored reach of the stream and would be a temporary source of water for wildlife. The ecological effects of these changes following the stream restoration would likely be mixed with some common species benefiting while for others it may not be beneficial, but the stream restoration would not impact a special-status plant or wildlife species population, as Little Sycamore Creek does not support special-status plants or wildlife species such as special-status fishes or amphibians that could be particularly sensitive to these changes. Also, the stream would continue to support single-parameter wetland and sensitive riparian habitats, although the species composition, structure, and distribution of these resources may change due to changes in geomorphology, hydrology, and the introduction of California natives for the restoration project, including several plant species that although indigenous to the Santa Monica Mountains were not documented during Stantec's biological surveys of the site. Overall, the stream restoration project, if successful is expected to improve habitat functions and values along the stream.

Ephemeral Streams

The project's permanent and temporary impacts to ephemeral streams at the project site would primarily result from storm water management improvements including two detention basins and in-stream culverts and storm drains to protect the Middle Camp and existing dirt roads from storm flows during rain events. Additional relatively minor permanent and temporary impacts to ephemeral streams would result from grading, fuel modification, and installation of underground utilities, which would only affect relatively small sections of these streams. The impacted acreage and the causes of impacts to these streams are provided in Tables 4-9 and 4-10.

The proposed project would permanently impact 0.01 acre of stream W2, <0.01 acre of stream W4, 0.02 acres of stream W5, <0.01 acres of stream W5A and <0.01 acre of stream W12. These impacts would be to RWQCB waters of the State and CDFW jurisdictional waters and habitat. The permanent impacts to W5 would be caused by grading and construction of an in-stream detention basin as well as installation of an in-stream culvert and a storm drain. W5 and its tributaries W5A through W5E are unnamed, ephemeral streams that are crossed by upland species and do not support riparian habitat.The detention basin would detain flows from stream W5 and other smaller tributaries to the northwest of the Middle Camp. The culvert would convey flows under an existing dirt road, and the storm drain would run generally southeast from the detention basin to Little Sycamore Creek. The permanent impacts to W5A would be caused by grading and installation of a culvert to allow the stream to flow under an existing dirt road.

The permanent impacts to W2, W4, and W12 would be caused by new fuel modification, which would only affect small sections of these streams. Grading, trenching, and installation of the detention basin and culverts within these streams would result in discharge of fill and removal of vegetation, and fuel modification would result in minor alteration of jurisdictional habitats. The permanent changes to these ephemeral streams including to RWQCB waters of the State and CDFW jurisdictional waters and habitat would be a significant, but mitigable impact. The project would also construct a detention basin at the eastern end of ephemeral stream W4, which is not identified as a new direct impact as it would be constructed in previously disturbed areas of the Camp.

The installation of culverts beneath existing dirt roads would improve stream continuity, and any changes in condition due to the culverts such as flow velocity would be minor and would not significantly affect the stream and associated habitats. The detention basins would change hydrological conditions as flows from stream W5 and several other minor tributaries to W5 as well as flows from W4 would be detained in the basin and consequently there would be reduced stream flow to Little Sycamore Creek, although in the current condition flows from W5 and W4 become diffuse and sheet flow after entering the disturbed areas of the Camp. The disruptions of stream flow and associated process such as sediment deposition to Little Sycamore Creek by detention basins would not impact a special-status plant or wildlife species population, as Little Sycamore Creek does not support special-status plant or wildlife species that would be particularly sensitive to these changes. Also, because the stream flows are ephemeral this is more likely to alter rather than result in loss of riparian habitat and therefore would be a potentially adverse but less than significant impact. The detention basins would retain water for a period following storm events, and therefore would be beneficial as temporary sources of water for wildlife.

The proposed project would temporarily impact <0.01 acre of stream W1A, <0.01 acre of stream W4, <0.01 acre of stream W5, <0.01 acre of stream W5A, <0.01 acre of stream W6, <0.01 acre of stream W6B and <0.01 acre of stream W6C. These impacts would be to RWQCB waters of the State and CDFW jurisdictional waters and habitat. The temporary impact to W1A would result from stream revegetation, which would be a beneficial action that would improve habitats along the stream. The temporary impacts to W4, W6 and W6C would be from grading, which would affect relatively small sections of these streams. The temporary impact to W6B would be caused by trenching to install underground utilities. The temporary impacts to W5 and W5A would result from grading and culvert installation. The temporary disturbance to these ephemeral streams including to RWQCB waters of the State and CDFW jurisdictional waters and habitat would be a significant, but mitigable impact. Installation of the culverts within W5 and W5A would be beneficial in that the culverts would improve stream continuity and protect existing dirt roads from damage during storm events.

Construction activities for the project within and in the vicinity of streams could potentially cause excessive erosion, sedimentation, and discharge of pollutants such as heavy metals and petroleum hydrocarbons to the streams at the project site. Excessive erosion, sedimentation, and discharge of pollutants could potentially degrade waters and riparian

habitat and have adverse effects on biological resources, which would be a potentially significant, but mitigable impact. The project would be required to comply with standard County requirements to protect water quality including implementation of a Stormwater Pollution Prevention Plan (SWPPP) during construction of the project. These requirements would avoid and minimize the transport of pollutants (such as fine sediment, heavy metals, petroleum hydrocarbons) to streams. Also, the project will be required to obtain resource agency permits from USACE, RWQCB, and CDFW, which will also include measures to avoid and mitigate potential construction phase impacts of pollutants on jurisdictional waters and habitat.

The project's permanent changes and temporary disturbances to Little Sycamore Creek and ephemeral streams would be significant, but mitigable impacts. The project would have a substantial adverse effect on riparian habitat identified by the CDFW, federally and state protected waters as defined by Section 404 and Section 401 of the CWA and the Porter-Cologne Water Quality Control Act, and CCC single-parameter wetlands. With implementation of mitigation measures BIO-15 and BIO-16, impacts to USACE waters of the U.S., RWQCB waters of the State, CDFW jurisdictional habitat, and CCC wetlands would be reduced a less than significant level (**Class II**). The storm water management improvements including the two detention basins and in-stream culverts and storm drains would be beneficial in that they would protect the Middle Camp and existing dirt roads from storm flows during rain events. Mitigation measures BIO-1 through BIO-5, BIO-7 through BIO-11, and BIO-14, BIO-17 and BIO-18 require construction exclusion fencing, pre-construction surveys and biological monitoring throughout construction, environmental awareness training for project personnel, a non-native/invasive plant species control and management plan be prepared, designated washout areas, conducting a rare plant survey, and requiring the submission of an ESHA mitigation plan to compensate for permanent and temporary impacts to ESHA, and a Habitat Mitigation and Monitoring Program to compensate for impacts to jurisdictional waters and habitat. Implementation of BMPs during the construction phase will also be employed and are addressed under mitigation measure County Stormwater Program (CSP)-M1 (see Section 2D, above).

The activities impacting USACE, RWQCB, and CDFW jurisdictional waters and habitat would be subject to permitting requirements under Section 404 and 401 of the CWA and California Fish and Game Code section 1600 *et seq*. The resource agency permits that would be acquired by law to complete the project will also include measures intended to avoid, minimize, and mitigate potential impacts to jurisdictional waters and habitat, and associated biological resources.

4C-2. *Result in disruptions to wetland or riparian plant communities that will isolate or substantially interrupt contiguous habitats, block seed dispersal routes, or increase vulnerability of wetland species to exotic weed invasion or local extirpation?*

The project would not permanently isolate or interrupt contiguous habitats, block seed dispersal routes, or increase the vulnerability of wetland species to local extirpation. The project is largely sited in existing developed and disturbed areas of the Camp that have

been in use for many years, and the areas of new impact would occur along the margin of existing developed and disturbed areas, and thus would not fragment or isolate habitats. There would be a temporary loss of habitat and temporary interruption of habitat contiguity along Little Sycamore Creek as the stream is graded, reconstructed, and the habitat restored, but the project would not permanently interrupt habitat contiguity along Little Sycamore Creek. The temporary loss of habitat would be potentially adverse, as at 4,329 linear feet a relatively large area of the channel would be affected. Common wildlife that normally inhabit or use the affected portion of the stream would have to move and temporarily use other habitats in the surrounding area. While some individual special-status wildlife could be impacted, if present, the affected portion of the stream is not important to the survival or viability of a known population of a special-status plant or wildlife species. The proposed structures within the channel such as storm drain outlets, toe slope protection, and velocity dissipation structures would not cover large enough sections of the channel to significantly impact habitat contiguity along the stream. The bridge crossings would span the stream and the bridge abutments would be outside the stream banks, which would allow unimpeded stream flow, contiguity of habitat, and wildlife movement. Some of the proposed storm drains would improve contiguity of stream flows where the storm water currently flows through developed or disturbed areas of the camp, causing flooding and erosion. The detention basins would impede but not entirely block the natural transport of seeds by water downstream from those portions of the watershed to Little Sycamore Creek, but this would not significantly impact the wetland or riparian plant communities at the site. The ephemeral streams upstream from the proposed basins lack wetland and riparian vegetation, and there are also several other tributaries to Little Sycamore Creek at the site and in the surrounding area that could be a source of seeds. As discussed, the project has the potential to cause weed invasion both during the construction and operational phases, which could degrade natural habitats including the wetland and riparian habitats at the site, which would be a potentially significant but mitigable impact. With implementation of mitigation measure BIO-9 potential impacts of invasive plant species on wetlands, waters, and riparian habitat would be reduced to a less than significant level (**Class II**).

4C-3. *Interfere with ongoing maintenance of hydrological conditions in a water or wetland?*

The stream restoration project for Little Sycamore Creek would change hydrological conditions somewhat but would not interfere, except temporarily during the construction phase, with ongoing maintenance of hydrological conditions along the stream. As discussed, the stream restoration project if successful is expected to be a beneficial impact overall, as it would improve habitat conditions and also achieve a stable creek system that would protect the camp from potentially severe mud and debris flows, and the stream hydrology would continue to support the development and maintenance of single-parameter wetlands and riparian habitat. Little Sycamore Creek is a relatively dry stream with intermittent flows during the wet season, and it does not support wetland habitats such as freshwater marshes or wet meadows that could be lost due to changes in channel topography and hydrological conditions. With respect to the ephemeral streams at the site, the installation of culverts beneath dirt roads would not interfere with

hydrological conditions and would improve continuity of flow. The detention basins would detain storm water and consequently there would be a reduction in flow to Little Sycamore Creek, although this would not significantly impact waters or wetlands within Little Sycamore Creek. Project impacts related to interference with ongoing maintenance of hydrological conditions in a waters and wetlands would be less than significant (**Class III**). As stated, the detention basins would have the benefit of protecting the camp from excess storm water, mud, and debris during rain events.

4C-4. *Provide an adequate buffer for protecting the functions and values of existing waters or wetlands?*

The Camp Hess Kramer is situated on the eastern and western sides of Little Sycamore Creek, such that much of the Lower Camp and Middle Camp are already within 100 feet of the stream, including the single-parameter wetlands and other habitats associated with the stream. As discussed, the proposed stream restoration component that would directly impact Little Sycamore Creek is designed to improve the functions and values of the stream. Most of the proposed project that would be sited near Little Sycamore Creek would be within the baseline footprint, or previously developed and disturbed areas of the Camp.

New development at the Lower Camp and Middle Camp that would be outside the baseline footprint and within a 100-foot buffer of Little Sycamore Creek would include the following:

- Part of grading and building footprint for Tennis Courts o/ Parking (0N)
- Part of Baruh Hall (18N)
- Fuel modification south of Tennis Courts o/ Parking, northwest of the Pool Building (19N), and north of Gildred Hall (14N)
- Pathway around western perimeter of The Village (20N though 25N, 37N and 38N)
- Staff Cabin (39N) and Maintenance Building (41N), and pathways near these structures
- Fuel modification to the north and south of the Staff Cabin (39N) and Maintenance Building (41N)

The above-listed new impacts to previously undeveloped and undisturbed areas would not significantly impact waters or wetlands. Except for the fuel modification south of the Tennis Courts / Parking, none of the new impacts would occur directly adjacent to the stream. In most cases the new impact would occur on relatively level or gradually sloped terrain, or in areas where existing development or disturbance already separates the new impact from the stream. The new fuel modification zones on slopes could result in some additional runoff containing sediment; however, this is not expected to be substantial as they would be thinning zones where some vegetation would be retained, which would protect against excess erosion. Also, the total area of new impact is relatively small compared to the much larger baseline footprint, which is already developed and disturbed. These new impacts would be compatible with the continued use of the stream

and associated habitats by wildlife.

Pollutants originating from the project site including the baseline footprint and areas of new impact during the operational phase such as heavy metals, petroleum hydrocarbons, herbicides, pesticides, fertilizers, and poisons used for pest and rodent control could be conveyed in storm water runoff to Little Sycamore Creek, via sheet runoff or concentrated flows through existing and proposed storm drains. These chemicals could affect invertebrates in aquatic and riparian habitats that provide the food base for many larger species, such as birds, and amphibians. There also would be a potential hazard to amphibians, reptiles, birds and mammals that use the aquatic habitats as a water source. Increases in nitrogen and other nutrients into aquatic and riparian habitats could alter plant species composition and the quality of habitat for wildlife. The overall effect of toxic chemicals being introduced to the stream would be potential loss or decrease in populations of species and a reduction of biodiversity. Chemicals and fertilizers could have adverse effects on sensitive waters and riparian habitats and conflict with local policies protecting stream and riparian ESHA. The potential for the project to contribute pollutants and degraded water quality, which could affect biological resources, would be a potentially significant, but mitigable impact. As discussed in Section 2D, Water Resources – Surface Water Quality, implementation of mitigation measure CSP-M1, which would require preparation of a post-construction storm water management plan to retain/treat runoff from the new impervious surface, a maintenance plan, and annual verification of ongoing maintenance would reduce these potential impacts to less than significant (**Class II**).

The above-listed new impacts within the 100-foot buffer of Little Sycamore Creek would impact ESHAs. To protect their functions and values wetlands, waters including ephemeral streams require a buffer. In addition to intermittent Little Sycamore Creek, the ephemeral streams at the site are also ESHAs and thus require ESHA buffers pursuant to the County CZO. Impacts to ESHA and encroachment within ESHA buffers are discussed under Section 4D: Ecological Communities - ESHA. See Section 4D: Ecological Communities – ESHA for additional discussion on the potential indirect effects of the project on ESHAs, including streams and riparian habitats.

Temporary and permanent impacts to Little Sycamore Creek and associated ephemeral drainages under the jurisdiction of state and federal agencies will require permits from these agencies. With the implementation of mitigation measures BIO-15 and BIO-16, and mitigation measures BIO-1, and BIO-7 through BIO-11 (noted in Section 4A above), and mitigation measure BIO-13 (noted in Section 4C, above), project specific impacts to waters and wetlands will be less than significant, and the proposed project will not make a cumulatively considerable contribution to a significant cumulative impact to sensitive plant communities.

Mitigation/Residual Impact(s)

Mitigation Measure BIO-14: Little Sycamore Creek Avoidance, Mitigation and Restoration Plan

Purpose: To avoid, minimize and mitigate construction impacts to Little Sycamore Creek from the project and to provide protocols for habitat restoration activities.

Requirement: Little Sycamore Creek Avoidance, Mitigation, and Restoration Plan (LSC Avoidance, Mitigation and Restoration Plan) that includes, at a minimum, the following:

- Description and graphical depiction of specific activities and their locations within the creek
- Location of any necessary temporary creek-access paths for construction equipment
- List of construction equipment proposed to be used in the creek
- Methods and durations of construction disturbance
- Avoidance, minimization, and mitigation strategies, including, as applicable:
    - Construction work timing restrictions (e.g., avoid work when water is present in the creek)
        - Alternatively, where work cannot be avoided and water is present, protocols for development and approval of a dewatering plan
    - Water quality-related Best Management Practices, including water quality testing and monitoring
    - Pre-construction survey requirements (plants, terrestrial and aquatic wildlife as work location dictates)
    - Nesting bird survey, buffer, and monitoring requirements
    - Mitigation Measures proposed if special-status species are present in or near work areas (e.g., rescheduling work, relocating species, species relocation method/locations)
    - On-site monitoring requirements during construction (i.e. monitoring by a qualified biologist)
    - Minimum mitigation ratios for impacts (not including restoration activities)
    - Incorporation of conditions of approval, including mitigation ratios, from required agency approvals (i.e. CDFW, RWQCB, ACOE) as applicable
    - Methods for Non-native and/or invasive plant species control and removal
- Reporting requirements

Documentation: The LSC Avoidance, Mitigation and Restoration Plan, prepared by a county-approved qualified restoration biologist/botanist (with experience and expertise in aquatic habitats).

Timing: Prior to commencement of any work in Little Sycamore Creek, the LSC Avoidance, Mitigation and Restoration Plan shall be submitted to the Planning Division for review and approval.

Monitoring and Reporting: Plan implementation, monitoring, and reporting shall be performed by a qualified restoration biologist/botanist consistent with the requirements of the LSC Avoidance, Mitigation and Restoration Plan. The Planning Division has the authority to conduct periodic site inspections to ensure ongoing compliance with this

condition consistent with the requirements of §8183-5 of the Ventura County Coastal Zoning Ordinance. Compliance with monitoring and reporting requirements required by CDFW, RWQCB, or ACOE is the responsibility of those agencies.

Mitigation Measure BIO-15: California Department of Fish and Wildlife (CDFW) Streambed Alteration Agreement (SAA)

Purpose: To ensure compliance with California Fish and Game Code § 1602.

Requirement: The Permittee shall obtain a Streambed Alteration Agreement (SAA) from the California Department of Fish and Wildlife (CDFW) for any excavation, fill, or other land disturbance activity within Little Sycamore Creek and any ephemeral drainages that fall within CDFW jurisdiction.

Documentation: The Permittee shall provide written proof or documentation to the Planning Division that the Permittee has obtained either: (1) the SAA from the CDFW; or (2) written verification from CDFW stating that a SAA is not required.

Timing: Prior to issuance of a Zoning Clearance for grading, the Permittee shall provide the SAA or written verification from the CDFW to the Planning Division.

Monitoring and Reporting: The Planning Division maintains a copy of the SAA or written verification from the CDFW, provided by the Permittee, in the project file. Conditions assigned to and monitoring of the SAA conditions, are the responsibility of CDFW.

Mitigation Measure BIO-16: Discharge of Dredged, Excavated or Fill Material to Waters of the United States

Purpose: To ensure compliance with § 401 and § 404 of the Clean Water Act.

Requirement: The Permittee shall obtain a § 401 Certification from the Regional Water Quality Control Board (RWQCB) and § 404 permit from the U.S. Army Corps of Engineers (ACOE) for excavation or fill activity within Little Sycamore Creek and any ephemeral drainages that fall within ACOE jurisdiction.

Documentation: The Permittee shall provide written proof or documentation to the Planning Division that the Permittee has obtained either: (1) a § 401 Certification and § 404 permit; or (2) letters from the responsible agencies stating that a § 401 Certification and/or § 404 permit is not required.

Timing: Prior to issuance of a Zoning Clearance for grading, the Permittee shall provide to the Planning Division a copy of the § 401 Certification and § 404 permit, or written verification the § 401 Certification and/or § 404 permit is not required.

Monitoring and Reporting: The Planning Division maintains a copy of the § 404 Permit and § 401 Certification, or letters from the responsible agencies stating that a § 401 Certification and § 404 permit are not required, in the project file.

With the implementation of mitigation measures BIO-15 and BIO-16, and mitigation measures BIO-1, and BIO-7 through BIO-11 (noted in Section 4A above), and mitigation measure BIO-13 (noted in Section 4C, above), project specific impacts to waters and wetlands will be less than significant, and the proposed project will not make a cumulatively considerable contribution to a significant cumulative impact to waters and wetlands.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
4D. Ecological Communities - ESHA (Applies to Coastal Zone Only)								
Will the proposed project:								
1) Temporarily or permanently remove ESHA or disturb ESHA buffers through construction, grading, clearing, or other activities and uses (ESHA buffers are within 100 feet of the boundary of ESHA as defined in Section 8172-1 of the Coastal Zoning Ordinance)?			X			X		
2) Result in indirect impacts from project operation at levels that will degrade the health of an ESHA?			X			X		

Impact Discussion:

4D-1. *Temporarily or permanently remove ESHA or disturb ESHA buffers through construction, grading, clearing, or other activities and uses (ESHA buffers are within 100 feet of the boundary of ESHA as defined in Section 8172-1 of the Coastal Zoning Ordinance)?*

ESHA as defined by the California Coastal Act is “any area in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem and which could be easily disturbed or degraded by human activities and developments.” The native plant communities and the non-native Eucalyptus groves as well as Little Sycamore Creek and other streams within the Survey Area qualify as ESHA in accordance with the County CZO. The riparian and upland ESHAs within the Survey Area are shown on Figure 9 of the ISBA, and stream ESHAs are shown on Figures 4-1 through 4-6 of the ISBA. Also, ESHA trees are shown on maps in the Arborist’s Report. The County CZO also requires buffer zones around ESHAs, to protect ESHAs from disruption of their resource values, which for the ESHA native habitats and streams within the Survey Area is 100 feet. Buffer zones provide distance and physical barriers between protected resources and human disturbance. The 100-foot ESHA buffers are also shown on Figure 9 in the ISBA. The required ESHA buffer is 125 feet for ESHA

Eucalyptus groves that provide suitable roosting habitat for overwintering monarch butterflies.

Much of the project site including the Lower Camp and Middle Camp fall under an existing Conditional Use Permit (CUP) and restrictive covenant for which ESHA and non-ESHA existing development areas are already designated. The ESHA status of habitats within these areas was therefore not reevaluated for this project. This existing development (non-ESHA) footprint is shown on Figure 9 in the ISBA. The CUP restrictive covenant also includes a 100-foot ESHA buffer around Little Sycamore Creek.

The project footprint is shown overlain on the plant communities within the Survey Area on Figures 3-1 through 3-3 in the ISBA. Permanent direct impacts to ESHA would result from grading, fuel modification, and construction of buildings, other structures, paved roads, hardscape, and pathways, which would remove vegetation, disturb soils, and potentially remove native seed banks. The acreage of ESHA that would be permanently and directly impacted by the project is provided in Table 4-6. Temporary direct impacts to ESHA would result from grading, utility installation, creek and habitat restoration, and temporary construction disturbance, which would also remove vegetation, disturb soils, and remove native seed banks. The acreage of ESHA that would be temporarily and directly impacted by the project is provided in Table 4-7. Also, the acreage of permanent and temporary impacts to ephemeral stream ESHAs are shown in Table 4-9 and Table 4-10, respectively. These permanent and temporary direct impacts to ESHA would be significant, but mitigable impacts. Additional potential direct impacts to ESHA include potential impacts to potentially occurring monarch butterfly overwintering roosts and certain Protected Trees, which are also considered ESHA. Impacts to monarch butterfly overwintering roosts and Protected Trees are discussed in Section 4A.

The Camp is located along a valley bottom along the eastern and western sides of Little Sycamore Creek, such that much of the Lower Camp and Middle Camp are already within 100 feet of ESHAs, including Little Sycamore Creek and the coast live oak woodlands along the valley bottom, and the ephemeral streams and native scrub on the hillsides surrounding the Camp. Most of the proposed development would be within 100-foot ESHA buffers, which would include grading, construction, and fuel modification. However, all of the proposed development within 100-foot ESHA buffers is entirely within the baseline footprint and/or existing development footprint designated by the existing CUP restrictive covenant. Therefore, the project would not result in new permanent or temporary encroachments into ESHA buffers, although the proposed uses and land cover within ESHA buffers would vary somewhat when compared to the pre-existing or pre-fire condition of the Camp. All proposed new development outside the baseline footprint would impact ESHA directly, and therefore would not be within ESHA buffers.

Ground and vegetation disturbance associated with the project, including but not limiting to, grading, construction, and fuel modification could facilitate the introduction and/or spread of non-native, invasive plant species. Invasive plant species could be dispersed by storm water, wind, or wildlife, or by various other means to ESHAs at the project site and in the surrounding area, including streams and riparian habitat, oak woodlands, and

the native scrub. Invasive species could compete with native plants for resources and disrupt normal ecological processes, reducing biological diversity and potentially threatening the quality of native habitats. Also, if invasive, non-native plant species are used in the project's landscaping, these invasive species could be dispersed to sensitive plant communities in the surrounding area. The introduction and spread of non-native, invasive plant species could have a substantial adverse effect on ESHAs at the project site and in the surrounding area, which would be a potentially significant but mitigable impact.

West of proposed buildings 14N and 13N, to the north of 17N was an area labeled as "Confidence Building" on the CUP-approved plans that was used for climbing structures prior to the Woolsey Fire. The proposed project would replace these with a climbing platform and would be linked to both the Dining Hall and the Baruh Hall/Swimming pool plaza by a proposed pedestrian bridge. This structure is being considered an accessory structure/use by the County and can't be established unless approved by the County. This area is located within the 100-foot ESHA buffer for Little Sycamore Creek, and in an area considered a non-ESHA existing development area under the existing CUP restrictive covenant. The structure would also be located close to the eastern bank of the stream. The area in question is disturbed and supports either non-native weedy vegetation or unvegetated areas. Placement of the Confidence Building and associated climbing and ropes course in this area would not impact native or sensitive vegetation but would occur within the required buffer around Little Sycamore Creek. When not in use the area would allow for use of wildlife for foraging and/or dispersal.

Implementation of mitigation measures BIO-17 and BIO-18 would reduce these potential direct impacts on ESHAs to a less than significant level (**Class II**). Mitigation measures BIO-1, BIO-2, BIO-7, BIO-8, through BIO-11, and BIO-20 require pre-construction surveys and biological monitoring throughout construction, environmental awareness training for project personnel, implementation of BMPs, implementation of a non-native plant species management plan to prevent the introduction and proliferation of non-native species, and implementation of an ESHA mitigation plan to compensate for impacts to ESHAs at the project site.

4D-2. *Result in indirect impacts from project operation at levels that will degrade the health of an ESHA?*

Potential indirect effects from the operation of the project are expected to be similar as those present within the Camp prior to the wildfires. Human activity and related noise would be similar as previous operations; only essential lighting is proposed within the Camp and therefore will have a similar impact as to pre-fire conditions. Lighting originally proposed for some of the sports activity areas (tennis court, basketball court) was eliminated to reduce potential effects on the adjacent habitats, including Little Sycamore Creek. Project-related lighting has been designed to avoid light spillover. All lighting is proposed so that light trespass does not exceed the maximum allowed pursuant to Section 8178-2.6.15 and Section 8177-4.1.11 of the CZO requirements and with advances in lighting is expected to result in less impacts than were present in pre-fire

conditions.

As discussed under Section 4A, trash / litter could contaminate natural communities including ESHAs and harm wildlife, and if not restricted to developed use areas visitors and pets may enter ESHAs where they could damage native habitats and injure or disturb wildlife. Also, amplified sound and light trespass and glare from outdoor night lighting could degrade ESHAs at the project site and in the surrounding area. These would be significant, but mitigable impacts (**Class II**). Implementation of Mitigation measures BIO-2, BIO-6, BIO-10, BIO-11, BIO-19 and BIO-20 require the Permittee to conduct a pre-construction meeting, install BMPs that address trash/litter and site maintenance, prepare a biological resources noise management plan to minimize project related noise impacts on ESHA, a lighting plan that conforms to CZO lighting policies, and installation of wildlife permeable fencing and signage at key locations to prevent unauthorized access to Little Sycamore Creek and other ESHAs by visitors or pets. Implementation of mitigation measures BIO-2, BIO-6, BIO-10, BIO-11, BIO-17 through BIO-20 would reduce these impacts to less than significant level (**Class II**).

Mitigation/Residual Impact(s)

Mitigation Measure BIO-17: Compensatory Mitigation for Environmentally Sensitive Habitat Areas (ESHA)

Purpose: The purpose of this condition is to require an ESHA Mitigation Plan in compliance with Ventura County Coastal Zoning Ordinance § 8178-2.10.9 and Appendix E2, Section AE-2.1 when a project will have impacts to ESHA.

Requirement: The Permittee shall prepare an ESHA Mitigation Plan pursuant to the requirements of Ventura County Coastal Zoning Ordinance Appendix E2, Section AE-2.1 and information contained in the ISBA prepared by Stantec Consulting Services dated November 27, 2023.

Documentation: The ESHA Mitigation Plan must include any required Habitat Restoration Plan (HRP), Habitat Maintenance and Monitoring Plan (HMMP), and Habitat Management Plan (HMP), pursuant to Ventura County Coastal Zoning Ordinance Appendix E2, Section AE-2.1.

Timing: Prior to issuance of a Zoning Clearance for grading, the Permittee shall (1) submit the ESHA Mitigation Plan to the Planning Division, and (2) implement the final ESHA Mitigation Plan pursuant to the timing requirements of the Habitat Restoration Plan (HRP), Habitat Maintenance and Monitoring Plan (HMMP), and Habitat Management Plan (HMP) (as applicable).

Monitoring and Reporting: The Planning Division reviews the draft and final ESHA Mitigation Plan to determine compliance with the requirements of this condition. If ESHA is mitigated offsite, the Planning Division will also review future project applications that involve properties that are the subject of the final ESHA Mitigation Plan, to ensure that future development complies with the requirements of the final ESHA Mitigation

Plan. The Planning Division has the authority to conduct periodic site inspections to ensure ongoing compliance with this condition consistent with the requirements of § 8183-5 of the Ventura County Coastal Zoning Ordinance.

Mitigation Measure BIO-18: On- and Off-Site Preservation of Environmentally Sensitive Habitat Areas (ESHA) in the Santa Monica Mountains (M) Overlay Zone

Purpose: In accordance with Coastal Area Plan Policy 5.8(b) and Coastal Zoning Ordinance § 8178-2.6.3(e), § 8181-3.5.3(g), and Appendix E2 (Section AE-2.2), all ESHA, buffer zones, steep slopes, and ESHA adjacent to parklands, located outside of the building site and mandatory fuel modification zone shall be preserved in perpetuity through a County-approved conservation easement or conservation instrument.

Requirement: The Permittee shall record a conservation easement or conservation instrument with the title to the subject property, pursuant to the requirements in the Ventura County Coastal Zoning Ordinance Appendix E2, Subsection AE-2.2.

Documentation: The Permittee shall prepare a conservation easement or conservation instrument pursuant to the content requirements in the Ventura County Coastal Zoning Ordinance Appendix E2, Subsection AE-2.2, and provide the draft conservation easement or conservation instrument, along with the preliminary title report, to the Planning Division for review and approval prior to recordation. The conservation easement or conservation instrument shall include, but not be limited to, the following information:

- A legal description of the area to be preserved in metes and bounds
- A graphic representation of the area to be preserved

Following recordation, the Permittee shall provide the Planning Division with a copy of the recorded conservation easement or conservation instrument.

Timing: Prior to issuance of a Zoning Clearance for grading and pursuant to the procedural requirements set forth in the Ventura County Coastal Zoning Ordinance Appendix E2, Subsection AE-2.2.1 (a) or (b) (as applicable), the Permittee shall record the conservation easement or conservation instrument.

Monitoring and Reporting: The Planning Division reviews the draft and recorded conservation easement or conservation instrument to determine compliance with the requirements of this condition. If ESHA is mitigated off site, the Planning Division will also review future project applications that involve the subject property to ensure that they comply with the requirements of the conservation easement or conservation instrument. The Planning Division has the authority to conduct periodic site inspections to ensure ongoing compliance with this condition consistent with the requirements of § 8183-5 of the Ventura County Coastal Zoning Ordinance.

With the implementation of mitigation measures BIO-17 and BIO-18, and BIO-2, BIO-6, BIO-10, BIO-11, BIO-17 through BIO-20, project specific impacts to ESHA will be less than significant, and the proposed project will not make a cumulatively considerable contribution to a significant cumulative impact to ESHA.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
4E. Habitat Connectivity								
Will the proposed project:								
1) Remove habitat within a wildlife movement corridor?			X			X		
2) Isolate habitat?		X				X		
3) Construct or create barriers that impede fish and/or wildlife movement, migration or long term connectivity or interfere with wildlife access to foraging habitat, breeding habitat, water sources, or other areas necessary for their reproduction?		X				X		
4) Intimidate fish or wildlife via the introduction of noise, light, development or increased human presence?			X			X		

Impact Discussion:

Habitat connectivity corridors are contiguous natural habitats of sufficient width to facilitate the movement, migration, foraging, breeding, and dispersal of multiple animal or plant species between core habitats. Habitat connectivity corridors may function at a regional or local scale.

Stantec conducted background research to identify whether there are any designated or mapped habitat connectivity features including habitat linkages or wildlife movement corridors within the Survey Area. Although there are no designated or mapped habitat linkages or wildlife movement corridors within the Survey Area, Stantec determined that W1 Little Sycamore Creek is likely a habitat connectivity corridor, and the larger ephemeral W5 stream is also likely used by wildlife for movement between lower and higher elevations in the surrounding area. Migratory birds are also expected to use Little Sycamore Creek riparian corridor as well as other habitats at the project site as short-term foraging and resting sites during migration movements. These two stream habitat

connectivity corridors as well as three crossing structures that allow passage of wildlife beneath existing roadways are shown on Figure 6-1 through 6-3 in the ISBA. One of the crossing structures includes an existing box culvert within Little Sycamore Creek that allows passage of small, medium, and large-sized animals beneath Highway 1, and a second box culvert within Little Sycamore Creek allows passage of small animals beneath the Gindling Hilltop Camp Fire Road. A third existing box culvert within the W2 ephemeral stream also allows passage of small, medium, and large-sized animals beneath Yerba Buena Road. The habitat connectivity corridors were mapped by Stantec as coinciding with waters of the State. While Little Sycamore Creek given its scale and associated habitats is the most important habitat connectivity feature within the Survey Area, many of the ridgelines and additional streams within the Survey Area are also likely used by wildlife for local movements, such as for example to move between foraging habitats or to access Little Sycamore Creek during periods when it contains flowing water. Stantec did not identify any barriers to wildlife movement or plant dispersal within the Survey Area other than the existing structures and other development at the site; the project site currently provides for mostly unrestricted wildlife movement with limited fencing or other obstructions for wildlife passage. Habitat connectivity corridors are also ESHAs in accordance with the County LCP.

4E-1. *Remove habitat within a wildlife movement corridor?*

The project would permanently remove habitat along Little Sycamore Creek for toe slope protection, energy dissipation structures, boulder weirs, and storm drain outlets. This would not remove a substantial amount of natural habitat or create a barrier or impediment to movement, and therefore would not permanently impact wildlife movement along the stream. The proposed stream restoration activities are expected to improve conditions along the stream for wildlife movement by increasing vegetative cover and habitat diversity, and in some cases would improve connectivity via storm drains between Little Sycamore Creek and its tributaries. If accessible, storm drains may be used for movement by wildlife. The permanent removal of habitat within the wildlife movement corridor would be less than significant, and the proposed restoration of the wildlife corridor is expected to benefit wildlife movement. The project would temporarily remove habitat and temporarily disrupt habitat contiguity along Little Sycamore Creek as the stream is graded, reconstructed, and the habitat restored. The temporary loss of habitat could have temporary adverse effects on wildlife movement, as protective cover and habitat for movement would be removed over a relatively long section of the channel. The temporary loss of habitat for wildlife movement along the stream channel would be a potentially significant, but mitigable impact, until the stream is successfully restored. Implementation of mitigation measures BIO-5B, BIO-7 through BIO-9, BIO-11, and BIO-13 through BIO-18 would ensure that stream habitats are fully restored following grading and construction associated with the stream restoration, which would reduce potentially significant impacts of wildlife movement to less than significant (**Class II**). Only relatively small amounts of habitat would be removed within ephemeral stream W5, which would have less than significant impacts on wildlife movement.

4E-2. *Isolate habitat*?

The project is designed such that it would not fragment and isolate habitat. The project would largely be sited in existing developed and disturbed areas, and new impacts would generally occur along the margins of existing developed and disturbed areas. No new roads or trails are proposed that would extend into and fragment intact habitats. There are some overhead and underground utilities that would be installed though contiguous areas of intact coastal scrub ESHA between the Camp Fire Road and Upper Camp and between Middle Camp and Upper Camp. These are relatively narrow swaths of temporary disturbance and would therefore not isolate habitat or disrupt habitat connectivity. The utilities however would impact ESHA, and construction and maintenance of the utilities would be a potential source of weed invasion, which is addressed in Section 4D. project impacts related to isolation of habitat would be less than significant (**Class III**).

4E-3. *Construct or create barriers that impede fish and/or wildlife movement, migration or long-term connectivity or interfere with wildlife access to foraging habitat, breeding habitat, water sources, or other areas necessary for their reproduction?*

The project would not create permanent barriers or impediments to fish or wildlife movement, migration, or long-term connectivity, or permanently interfere with wildlife access to foraging habitat, breeding habitat, water sources, or areas necessary for reproduction. Little Sycamore Creek is not suitable habitat for fish species, and it is not potential spawning or rearing habitat for migratory steelhead. Furthermore, it does not experience any tidal influence from the Pacific Ocean. Therefore, the project including the stream restoration would not potentially interfere with movement or migration of fish species. The stream and storm water improvements that would be installed in Little Sycamore Creek would not restrict wildlife movement, and the existing and proposed bridge crossings would span the stream and be high enough above the stream bed to allow for passage of large animals. Proposed walls and fencing would be closely associated with the developed areas of the Camp, and furthermore would be required to comply with CZO fencing requirements. Walls and fencing would not be installed in ESHAs, including potential wildlife movement areas. The affected reach of Little Sycamore Creek is not of critical importance for wildlife movement such as being a bottleneck of habitat between larger areas of core habitat, or in an area that wildlife must pass through to access especially important resources, such as nursery sites. Construction activities associated with the stream restoration could potentially be disruptive to some terrestrial wildlife movement, including movement to access intermittent water sources at Little Sycamore Creek, but construction would be temporary and would not occur during nighttime hours when most wildlife movement takes place. During the construction phase most wildlife would be capable of temporarily utilizing other habitats in the surrounding area for movement. The project would primarily be sited in existing developed and disturbed areas, and with development of the project there would still be extensive natural habitats in the surrounding area that could be used for movement. There would also continue to be access for wildlife to move unimpeded via intact natural habitats to Little Sycamore Creek, such as to the section of the stream between the Lower and Middle Camps or the section upstream from the project site.

Grading and construction for culverts and the detention basin within ephemeral stream W5 would not occur at night when most movement would take place. Installation of culverts beneath dirt roads would not adversely affect movement along the stream and may improve conditions for movement for smaller animals, as they could bypass crossing dirt roads. Installation of the detention basin and storm drain would not significantly impact wildlife movement; the connectivity of this stream to Little Sycamore Creek is already disrupted in the existing condition as it becomes diffuse and sheet flows upon reaching the developed and disturbed portion of the Middle Camp. Wildlife moving between Little Sycamore Creek and stream W5 could move through adjacent upland habitats to avoid the developed and disturbed portion of the Middle Camp.

Project impacts related to barriers, impediments, and interference with wildlife movement would be less than significant (**Class III**).

4E-4. *Intimidate fish or wildlife via the introduction of noise, light, development or increased human presence?*

The project would generate some indirect edge effects that would potentially have adverse effects on wildlife movement. These edge effects would include human presence, especially during nighttime hours, amplified sound, and outdoor night lighting. The hours of operation would extend well into the evening hours when most wildlife movement would take place, and cabins and campgrounds would be used by overnight guests. The Camp would accommodate a relatively large number of nighttime visitors, including a maximum overnight population of 557 people, which increases the potential for visitors to disturb wildlife and cause wildlife to avoid the area. The use of amplified sound especially during nighttime hours has the potential to disturb wildlife, which could impact wildlife movement. Outdoor night lighting would light pathways close to riparian zones, which although necessary for security could cause some disturbance to wildlife. The potential presence of a relatively large number of overnight visitors, amplified sound, and outdoor lighting during nighttime hours would have potentially significant, but mitigable impacts on wildlife movement. Also, due to its close proximity to ESHAs and the wildlife movement corridor, use of the Confidence Building and associated climbing and ropes course during nighttime hours including any associated outdoor night lighting and loud noise could have adverse effects on wildlife movement. Implementation of mitigation measures BIO-6, BIO19, and BIO-20 would reduce these impacts to less than significant level (**Class II**). Mitigation measures BIO-7 and BIO-8, BIO-10, and BIO-17 through BIO-20 would require a biological resources noise management plan to minimize project related noise impacts on wildlife movement, a lighting plan that conforms with CZO lighting policies, installation of wildlife permeable fencing and signage at key locations to prevent unauthorized access to Little Sycamore Creek by visitors or pets, and restoration of riparian habitats following grading and construction for stream and flood control improvements.

Mitigation/Residual Impact(s)

Mitigation Measure BIO-19: Wildlife Habitat Outdoor Lighting/Glare Condition

Purpose: To mitigate potentially significant environmental impacts from light and glare to wildlife migration corridors and/or wildlife habitat and to implement Ventura County Coastal Zoning Ordinance § 8175-5.4.6 (Camp Facility Lighting), § 8177-4.1.11 (Outdoor Lighting) and § 8178-2.6.15 (Outdoor Lighting Standards in ESHA and Buffer Zones) to preserve the natural darkness of the night sky, reduce sky glow, minimize light trespass, improve star viewing, and decrease energy consumption.

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

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

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

c. the lighting plan shall provide illumination information for all exterior lighting such as parking areas, walkways/driveways, streetscapes, and open spaces proposed throughout the development;

d. in order to minimize light and glare on the project property, all parking lot lighting, exterior structure light fixtures, and freestanding light standards must be a cut-off type, fully shielded, and downward directed, such that the lighting is projected downward onto the property and does is not directed towards adjacent ESHA and wildlife habitat, property or roadway; and,

e. light emanation shall be controlled so as not to produce excessive levels of glare or abnormal light levels directed at any neighboring uses. Lighting shall be kept to a minimum to maintain the normal night-time light levels in the area, but not inhibit adequate and safe working light levels.

f. Outdoor lighting shall maintain the maximum light trespass levels identified in Table 1 of NCZO Section 8109-4.7.4.

g. Site lighting shall comply with the standards in the Ventura County Coastal Zoning Ordinance Section 8177-4.1.11.5 (General Outdoor Lighting Standards) including the following (except as exempted in Ventura County Coastal Zoning Ordinance § 8177-4.1.11.2 (a), (b)(1), (2) & (4) and (d)) including:

- Lighting Color
- Maximum Lumens Per Light Fixture
- Maximum Height Allowance
- Dark Hours; and
- Essential Lighting

The Permittee shall bear the total cost of the review and approval of the lighting plan. The Permittee shall install all exterior lighting in accordance with the approved lighting plan.

Documentation: The Permittee shall submit two copies of the lighting plan to the Planning Division for review and approval.

Timing: Prior to the issuance of a Zoning Clearance for construction, the Permittee shall submit the lighting plan to the Planning Division for review and approval. The Permittee shall ensure that the lighting is installed according to the approved lighting plan prior to the issuance of a Certificate of Occupancy. The Permittee shall maintain the lighting pursuant to the approved lighting plan, for the life of the project.

Monitoring and Reporting: The Planning Division maintains a stamped copy of the approved lighting plan in the project file. The Building and Safety Inspector and Planning Division staff have the authority to ensure that the lighting plan is installed according to the approved lighting plan. The Planning Division has the authority to conduct periodic site inspections to ensure ongoing compliance with this condition consistent with the requirements of § 8183-5 of the Ventura County Coastal Zoning Ordinance.

Mitigation Measure BIO-20: Fencing Adjacent to Wildlife Corridors

Purpose: To ensure compliance with Ventura County Coastal Zoning Ordinance §§ 8175-3.11 and 8178-2.6.10, to protect and control access into sensitive areas and ESHA by visitors and domestic pets, and to mitigate potentially significant environmental impacts to wildlife migration corridors from fencing.

Requirement: The Permittee shall develop an ESHA Protection Fencing/Signage Plan that includes a site plan showing the location of fencing, specification of the fence, and signage (materials sign dimensions, and copy) to the Planning Division for review and approval. The ESHA Protection Fencing/Signage Plan shall include, but not be limited to, the following:

1. The Permittee shall ensure that all new fences, except for those within 100 feet of structures and retaining walls, are permeable to wildlife, and conform to the following standards:

    a. A split-rail, pole, or wire fences must be constructed such that:

        - The top rail or wire is no more than 40 inches above the ground;
        - The top two rails or wires are at least 12 inches apart;
        - The bottom wire or rail is at least 18 inches above the ground;
        - Both the top and bottom wires or rails are smooth (no barbed wire on the top or bottom wires);
        - There are no vertical stays; and
        - The posts are located a minimum of 10 feet apart.

2. The Permittee shall install signage at key locations along the margins of native habitats, and other areas where there is increased potential for visitor or pet encroachment to discourage access by visitors or pets into ESHAs and to inform camp personnel and visitors of the sensitivity of ESHAs.

Documentation: The Permittee shall submit the ESHA Protection Fencing/Signage Plan to the Planning Division for review and approval.

Timing: Prior to the issuance of a Zoning Clearance for construction, the Permittee shall submit the ESHA Protection Fencing/Signage Plan. Prior to Certificate of Occupancy, the ESHA Protection Fencing/Signage Plan shall be installed for the designated area.

Monitoring and Reporting: The Planning Division has the authority to conduct site inspections to ensure that the Permittee installs and maintains the fencing and signage in compliance with this condition, consistent with the requirements of § 8183-5 of the Ventura County Coastal Zoning Ordinance.

With the implementation of mitigation measures BIO-19 and BIO-20, and BIO-7 and BIO-8, BIO-10, and BIO-17 through BIO-20, project specific impacts to habitat connectivity will be less than significant, and the proposed project will not make a cumulatively considerable contribution to a significant cumulative impact to habitat connectivity.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
4F. Will the proposed project be consistent with the applicable General Plan Goals and Policies for Item 4 of the Initial Study Assessment Guidelines?		X				X		

Impact Discussion:

4F. The proposed project is consistent with the Ventura County General Plan Goals and Policies of the Ventura County Initial Study Assessment Guidelines. General Plan Biological Resources Policies COS -1.1 (Protection of Sensitive Biological Resources) and COS-1.2 (Consideration of Sensitive Biological Resources) requires discretionary development that could potentially impact biological resources to be evaluated by a qualified biologist to assess impacts, and, if necessary, develop mitigation measures to mitigate any significant impacts to biological resources to less-than-significant. An Initial Study Biological Assessment (ISBA) (Stantec, 2023) was prepared for the proposed project. With the implementation of Mitigation measures BIO-1 through BIO-20 to protect the biological resources identified in the ISBA, the proposed project will be consistent with General Plan Policies COS-1.1 and COS-1.2.

The project site is located within areas that are subject to the Coastal Area Plan. Coastal Area Plan South Coast Santa Monica Mountains Policy 4.4.2.12 requires National Park Service, Coastal Conservancy, the Santa Monica Mountains Conservancy, State Department of Parks and Recreation, County Recreation Services, and Trust for Public Lands be consulted for discretionary entitlement applications that may adversely affect the biological resources. The Planning Division notified and requested comments from the National Parks Service, Santa Monica Mountains Conservancy, California State Coastal Conservancy, California State Parks, the Trust of Public Lands and Ventura County General Services Agency Parks Division regarding the proposed project. To date, no responses have been received.

Additionally, Coastal Area Plan South Coast Santa Monica Mountains Policy 5.8 (b) requires all habitat areas to be permanently maintained in open space through an easement or other appropriate means. The proposed project will be consistent with Coastal Area Plan South Coast Santa Monica Mountains Policy 5.8 (b) with the implementation of mitigation measures BIO-17 and BIO-18, which will require the Applicant to enhance, restore, establish, and preserve ESHA at the prescribed mitigation-to-impact ratio. As a result, the proposed project is consistent with General Plan Goals and Policies and Coastal Area Plan policies governing biological resources.

Mitigation/Residual Impact(s)
With the implementation of mitigation measures BIO-1 through BIO-20, residual impacts will be less than significant.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
5A. Agricultural Resources – Soils (Plng.)								
Will the proposed project:								
1) Result in the direct and/or indirect loss of soils designated Prime, Statewide Importance, Unique or Local Importance, beyond the threshold amounts set forth in Section 5a.C of the Initial Study Assessment Guidelines?	X				X			
2) Involve a General Plan amendment that will result in the loss of agricultural soils?	X				X			
3) Be consistent with the applicable General Plan Goals and Policies for Item 5A of the Initial Study Assessment Guidelines?	X				X			

Impact Discussion:

5A-1. The project site does not contain soil classified under the Important Farmland Inventory Classification as Prime, Statewide Importance, Unique or Local Importance.

5A-2. The project does not include a General Plan amendment that would result in the loss of agricultural soil.

5A-3. The proposed project is consistent with the applicable Ventura County General Plan Goals and Policies of Item 5a of the Ventura County Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): None

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
5B. Agricultural Resources - Land Use Incompatibility (AG.)								
Will the proposed project:								
1) If not defined as Agriculture or Agricultural Operations in the zoning ordinances, be closer than the threshold distances set forth in Section 5b.C of the Initial Study Assessment Guidelines?	X				X			
2) Be consistent with the applicable General Plan Goals and Policies for Item 5b of the Initial Study Assessment Guidelines?	X				X			

Impact Discussion:

5B-1. The project site does not contain activities defined as Agriculture or Agricultural Operation in the Coastal Zoning Ordinance, is not adjacent to off-site classified farmland or within the 300 feet threshold from adjacent classified farmland.

5B-2. The proposed project is consistent with the applicable Ventura County General Plan and Policies of Item 5b of the Ventura County Initial Study Guidelines.

Mitigation/Residual Impact(s): None

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
6. Scenic Resources (Plng.)								
Will the proposed project:								
a) Be located within an area that has a scenic resource that is visible from a public viewing location, and physically alter the scenic resource either individually or cumulatively when combined with recently approved, current, and reasonably foreseeable future projects?			X				X	
b) Be located within an area that has a scenic resource that is visible from a public viewing location, and substantially obstruct, degrade, or obscure the scenic vista, either individually or cumulatively when combined with recently approved, current, and reasonably foreseeable future projects?			X				X	
c) Be consistent with the applicable General Plan Goals and Policies for Item 6 of the Initial Study Assessment Guidelines?	X				X			

Impact Discussion:

6a. and 6b. The project site is not located within the Scenic Resource Protection (SRP) area; however, the project is in the Santa Monica Mountains. The property is surrounded by land designated as COS-10ac-sdf/M, the project site and surrounding areas are considered a scenic resource as defined in Item 6 of the VC ISAGs. The proposed project will be visible from California State Highway 1 – Pacific Coast Highway and from Yerba Buena Road. The project will not be visible from Yellow Hill Trail, located approximately 1.1 miles to the east and from Big Sycamore Canyon trail located approximately 2.6 miles to the west. The project is located 0.58 miles east of National Park Service land.

The planning division conducted a site visit on June 2022 and determined that the project will be visible from public roadways and other viewing locations. The parking area/tennis court (0.N) structure is the closest structure to Pacific Coast Highway (PCH) and is located approximately 35 feet from the PCH right of way (ROW). Screening adjacent to PCH for structure 0.N will include 34 new trees, as show in Attachment D of the ISBA (Attachment F). The tennis court perspective renderings (Attachment B-4) that were provided are a visual simulation from one public viewing location at the driveway entry along Yerba Buena Road and three public viewing locations along PCH. The visual simulation shows that the trees and vegetation screening will minimize the visibility of structure 0.N from

Yerba Buena Road and PCH. Additionally, the structure will be constructed with materials of a natural color tone thus making the structures compatible with the viewshed from Yerba Buena Road and PCH.

Before the Woolsey Fire, development in Lower and Middle camp was located along Little Sycamore creek and comprised mostly of one-story structures. The new structures in Lower and Middle camp will be sited in the same or similar location as before the Woolsey Fire.

Yerba Buena Road is at a higher elevation and runs along the eastern boundary of Lower and Middle camp. The elevation at the intersection of Yerba Buena Road and Ellice Street is 65 ft, Gil Fitch Field is located west to this point at an elevation of approximately 46 feet. East of Middle Camp, Yerba Buena Road is at an elevation of approximately 250 feet. Elevation at Lower and Middle camp are the following: parking area/tennis court (0.N) 36 ft, Gil Fitch Field 48 ft, Breuer Lawn 59 ft, Middle Camp 130 ft – 209 ft and Scouts Grove 180 ft-195 ft. Yerba Buena Road renderings (Attachment B-5) provide a visual simulation of four public viewing locations from along Yerba Buena Road. Due to the topography, change of elevation and vegetation not all the development will be visible from Yerba Buena Road. The structures will be constructed of materials and colors that complement those scenic resource areas (Attachment B-2).

At Upper Camp the structures will be of similar height and in the same general location as before the fire.

PRC § 30240 requires development in areas adjacent to environmentally sensitive habitat areas be designed to prevent impacts which would significantly degrade those areas. Public Resources Code (PRC) § 30251 requires permitted development to be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural landforms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas. To ensure that the camp structures are compatible with the natural environment of the Santa Monica Mountains, the proposed project will be conditioned to require that all structures be painted or contain earth tone colors and materials. The structures have been sited and designed to be compatible with the natural environment as much as possible, the proposed project would result in less-than-significant project-specific impacts and would not result in a cumulatively considerable contribution to a significant cumulative impact, related to scenic resources.

Condition of Approval - Scenic Resources: Materials and Colors in the Santa Monica Mountains Overlay Zone

Purpose: In order to ensure that buildings and structures comply with Public Resources Code §§ 30240(b) and 30251 and Ventura County Coastal Zoning Ordinance § 8178-2.6.12.

Requirement: The Permittee shall utilize natural building materials and colors compatible with surrounding terrain (earth tones and non-reflective paints) on exterior surfaces of all structures, including but not limited to the dwelling, trash area, water tanks, walls, pilasters, and fences.

Documentation: A copy of the approved plans denoting the colors and materials and bird-friendly treatments. The Permittee shall provide photos of the constructed principal structure/use and landscaping to the Planning Division, or schedule a site inspection with the Planning Division, to verify that the Permittee constructed and painted the principal structure/use and installed landscaping and irrigation according to the approved plans and materials sample/color board.

Timing: Prior to the issuance of a Zoning Clearance for construction of the project, the Permittee shall submit the building plans with the colors and materials noted on all structures for review and approval by the Planning Division. Prior to final inspection, the Permittee shall paint the structures according to the approved plans. Prior to Certificate of Occupancy, the Permittee shall provide photographs demonstrating that the Permittee constructed the principal structure or use in compliance with the approved plans and materials sample/color board and all landscaping and irrigation has been installed in accordance with the approved plans or schedule a site inspection with the Planning Division, to verify that the Permittee constructed and painted the principal structure/use and installed landscaping and irrigation according to the approved plans and materials sample/color board.

Monitoring and Reporting: The Planning Division maintains the approved plans in the project files. Prior to occupancy, the Planning Division has the authority to inspect the site to ensure that the exterior of the structures was treated as approved. The Permittee shall maintain these materials and colors throughout the life of the CUP. The Planning Division has the authority to inspect the site to confirm on-going compliance with the approved plans consistent with the requirements of § 8183-5 of the Ventura County Coastal Zoning Ordinance.

6c. The proposed project is consistent with the Ventura County General Plan Goals and Policies for item 6 of the Ventura County Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): None

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
7. Paleontological Resources								
Will the proposed project:								

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
a) For the area of the property that is disturbed by or during the construction of the proposed project, result in a direct or indirect impact to areas of paleontological significance?		X				X		
b) Contribute to the progressive loss of exposed rock in Ventura County that can be studied and prospected for fossil remains?	X				X			
c) Be consistent with the applicable General Plan Goals and Policies for Item 7 of the Initial Study Assessment Guidelines?	X				X			

Impact Discussion:

7a. Bedrock underlying the near flat lying areas adjacent to Little Sycamore creek and exposed in most of the slopes is a combination of Topanga Formation and Conejo Volcanic units, as discussed in Geotechnical Feasibility Report from Earth Systems Pacific, dated February 25, 2020, prepared for Lower and Middle Camp (Attachment H). According to CZO Section 8178-3.2, the Topanga Formation is classified by the Bureau of Land Management as of Moderate Paleontological Resource importance and Conejo Volcanics as of no Paleontological importance. Areas classified as Moderate are described as Geologic Units that may contain vertebrate fossils or scientifically significant non-vertebrate fossils, but where occurrences are widely scattered. The potential for a project to be sited on or impact a scientifically locality is low, however the potential still exists. The proposed project will create a less-than-significant project-specific impact and will make a less-than-significant cumulatively considerable contribution to a significant impact to paleontological resources.

Although the proposed project is unlikely to result in impacts to paleontological resources, future grading activities will be subject to the following condition of approval, to ensure the protection of any subsurface resources that are inadvertently encountered during grading activities.

Condition of Approval: Paleontological Resources Discovered During Grading
Purpose: In order to mitigate potential impacts to paleontological resources that may be encountered during ground disturbance or construction activities.

Requirement: If any paleontological remains are uncovered during ground disturbance or construction activities, the Permittee shall:

a. Cease operations and assure the preservation of the area in which the discovery was made;

b. Notify the Planning Director in writing, within three days of the discovery;

c. Obtain the services of a paleontological consultant or professional geologist who shall assess the find and provide a report that assesses the resources and sets forth recommendations on the proper disposition of the site;

d. Obtain the Planning Director's written concurrence with the recommended disposition of the site before resuming development; and

e. Implement the agreed upon recommendations.

Documentation: The Permittee shall submit the paleontologist's or geologist's reports. Additional documentation may be required to demonstrate that the Permittee has implemented the recommendations set forth in the paleontological report.

Timing: If any paleontological remains are uncovered during ground disturbance or construction activities, the Permittee shall provide the written notification to the Planning Director within three days of the discovery. The Permittee shall submit the paleontological report to the Planning Division immediately upon completion of the report.

Monitoring and Reporting: The Permittee shall provide the paleontological report to the Planning Division to be made part of the project file. The Permittee shall implement any recommendations made in the paleontological report to the satisfaction of the Planning Director. The paleontologist shall monitor all ground disturbance activities within the area in which the discovery was made, in order to ensure the successful implementation of the recommendations made in the paleontological report. The Planning Division has the authority to conduct site inspections to ensure that the Permittee implements the recommendations set forth in the paleontological report, consistent with the requirements of § 8183-5 of the Ventura County Coastal Zoning Ordinance.

7b. The project is within the Topanga Formation (Attachment H) and categorized by the Bureau of Land Management as of Moderate Paleontological Resource importance. Lower Camp grading for structural development, road expansion, bridges, stormwater, and creek restoration will include 27,700 cubic yards (CY) of cut and 13,200 CY of fill. Middle Camp grading for structural development, road expansion, bridges, stormwater, and creek restoration will include 16,800 CY of cut and 19,700 CY of fill. Upper Camp grading for structural development will be approximately 2,100 CY within the existing building footprints. Except for Buildings 39.N and 41.N, grading will occur in areas that contained structures before the fire or areas that were previously disturbed. Grading for Buildings 39.N and 41.N will include approximately 180 CY of cut and 50 CY of fill.

7c. The proposed project is consistent with the applicable Ventura County General Plan Goals and Policies for Item 7 of the Ventura County Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): None

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
8A. Cultural Resources - Archaeological								
Will the proposed project:								
1) Demolish or materially alter in an adverse manner those physical characteristics that account for the inclusion of the resource in a local register of historical resources pursuant to Section 5020.1(k) requirements of Section 5024.1(g) of the Public Resources Code?			X				X	
2) Demolish or materially alter in an adverse manner those physical characteristics of an archaeological resource that convey its archaeological significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for the purposes of CEQA?			X				X	
3) Be consistent with the applicable General Plan Goals and Policies for Item 8A of the Initial Study Assessment Guidelines?			X				X	

Impact Discussion:

8A-1 and 8A-2. Coastal Planned Development Permit LU10-0069 authorized the continued use of the camp and the construction of an OWTS. A Phase I investigation was conducted for the area dedicated to the OWTS and the project site is in an area that will potentially affect archaeological sites. For the proposed project, Stantec archaeologists conducted a pedestrian archaeological survey of all three camp areas and provided an Updated Phase I Cultural Resources Monitoring and Mitigation Recommendations for the Proposed Rebuilding of Camp Hess Karmer Report (Report), dated March 2021, prepared by Registered Professional Archaeologist Dr. Mitch Marken (Stantec).

The Report was peer reviewed by Rincon Consultants, Inc. (Rincon). The report findings determined a pre and post debris flow analysis would not be required since it would provide little value to the overall Report based on the existing condition of the camp. Additionally, it was concluded that geotechnical boring should be conducted in lieu of a

formal Extended Phase 1 investigation to test subsurface deposits within proposed building locations throughout the camp.

On March 8, 2023, Zoning Clearance No. ZC23-0146 was approved for geotechnical borings for 32 locations across Lower and Middle Camp. Stantec archaeologist, Rocky Ciarmoli, provided archaeological monitoring during the geotechnical boring activities and an independent Native American monitor was also present. Geotechnical boring activities were conducted in March 2023 (March 13th, 15th, 16th, 17th, 27th and 28th). The 32 geotechnical borings extended in depths of 5 to 50 feet below the surface. While the results were all negative for archaeological material, cultural material was on the surface near five bore locations. Based on the results of the borings, additional Phase I testing was recommended at four locations.

On September 22, 2023, a memorandum was provided to the County from EnviroPro Consulting LLC summarizing the results of archaeological test trenching. Four archaeological test trenches were excavated from September 11 through September 13, 2023, by qualified archaeologist from EnviroPro Consulting. All on-site pre-field planning and test trenching was monitored by Mr. Leo Mamamait an official approved Native American Monitor representing the Barbareño/Ventureño Band of Mission Indians (BVMI). The goal of the testing was to determine if intact cultural deposits were within the construction footprint. A track backhoe was used to excavate the trenches. Trenches were generally two meters long by one meter wide (or roughly 7 feet by 3 feet), with excavated depths between 70 centimeters below the surface (cmbs) and 160 cmbs deep. The first scrape for each trench was screened through a 1/8 inch hardware cloth using an archaeology screen. Following the first 10 cm levels, archaeologists observed each scrape looking for artifacts, features, or darker midden soils. After two negative levels, selective backhoe buckets would again be screened to ensure consistent negative results. All four trenches were negative for cultural resources and did not reveal any cultural layers such as midden soils. The project site is, however, considered sensitive for cultural resources and there is the possibility that pockets of undisturbed cultural material exist within the landscape. Implementation of mitigation measure CR-1, Cultural Resources Construction Monitoring and Post Discovery Plan, will ensure that construction activities will avoid archaeological resources and impacts to archaeological resources will result in less than significant individual and cumulative impacts.

Mitigation/Residual Impact(s)

Mitigation Measure CR-1: Cultural Resources Construction Monitoring and Post Discovery Plan

Purpose: To comply with Coastal Act Section 30244 and to avoid significant impacts to previously recorded or any presently unknown archaeological sites or features, as well as unrecorded sites or deposits.

Requirement:

a. The Permittee shall retain a qualified Registered Professional Archaeologist (RPA) to prepare a Cultural Resources Construction Monitoring and Post Discovery Plan (CRCMPDP) for subsurface grading, trenching, or construction activities on the project site in consultation with the Property Owner and the County of Ventura.

   The CRCMPDP shall include, but not be limited to, the following:

   - The protocols, research design and measures using similar protocols established in the Cultural Resources Monitoring Plan written for the Camp Hess Kramer Onsite Wastewater Treatment System (OWTS) (Case No. LU10-0069);
   - Include elevation and geomorphological data to ascertain where restoration, stream stabilization, and other ground disturbing construction will penetrate native soils at a depth of 1 foot below pre-debris flow elevations;
   - Describe how recommendations will be implemented during construction;
   - Identify areas where, and procedures for archaeological and Native American monitoring of earth-moving activities that may impact native soils;
   - Describe methods that will be used to identify any archaeological deposits that might be found during ground disturbing work and determine whether such deposits are intact or disturbed;
   - Include protocols for communications among the Property Owner, Permittee, construction supervisor, archaeologist, and Native American representative to ensure that decisions are made timely in the field with respect to temporary relocation of construction work, as warranted;
   - Include a safety plan for archaeological and Native American monitoring and data-recovery work in the context of the OWTS construction project;
   - Include identified Tribal Cultural Resources;
   - Include the Barbareño/Ventureño Band of Mission Indians BVBMI (BVMI) as the Most Likely Descendants (MLD) for the Project area; and
   - Include a 30-day review and comment period on the CRCMPDP with the Barbareño/Ventureño Band of Mission Indians (BVBMI) on protocols set forth in the plan or the approved permit Conditions of Approval that address cultural or tribal resources that may be encountered during construction activities.
   - Include a Native American consultation and monitoring component;
   - Identify a plan for treating unanticipated discoveries of intact archaeological deposits during construction, and specific timelines for resolution (see item d, below)**;**
   - Include a check list of the steps to be taken in the event that human remains are encountered, in order to comply with applicable sections of the California Public Resources Code and Health and Safety Code (see item e, below);

- Include criteria by which decisions will be made to suspend construction work temporarily at find locations and to promptly recover important archaeological data that otherwise would be lost.

b. The Permittee shall retain a Qualified Archaeologist and Barbareño/Ventureño Band of Mission Indians (BVBMI) Native American representative to monitor all subsurface grading, trenching, or construction activities on the project site in accordance with the CRCMPDP.

c. A pre-construction meeting will be held with the qualified Archaeologist, Native American representative, and construction personnel, prior to the start of work, to discuss the requirements and protocols set forth in the CRCMPDP.

d. The CRCMPDP shall include a process for any archaeological or historical artifacts that are uncovered during ground disturbance or construction activities, including:

   - Protocols for ceasing operations and assuring the preservation of the area in which the discovery was made;
   - Notify the Planning Director in writing, within three days of the discovery;
   - Protocols regarding how the County-approved archaeologist shall assess the find and provide recommendations on the proper disposition of the site in a written report format;
   - Obtaining the Planning Director's written concurrence of the recommended disposition of the site before resuming development; and
   - How to implement the agreed upon recommendations.

e. If any human burial remains are encountered during ground disturbance or construction activities, the Permittee shall:

   - Cease operations and assure the preservation of the area in which the discovery was made;
   - Immediately notify the County Coroner and the Planning Director;
   - Obtain the services of a County-approved archaeologist and, if necessary, Native American representative(s), who shall assess the find and provide recommendations on the proper disposition of the site in a written report format;
   - Obtain the Planning Director's written concurrence of the recommended disposition of the site before resuming development on-site; and
   - Implement the agreed upon recommendations.

Documentation: The Permittee shall provide to the Planning Division, a copy of a signed contract (financial information redacted) with a County-approved qualified archaeologist

and Barbareño/Ventureño Band of Mission Indians (BVBMI) Native American representative.

The Permittee shall provide a copy of the CRCMPDP to the Planning Division for review and approval. The Qualified Archaeologist and BVBMI Native American representative shall provide a weekly report to the Planning Division summarizing the activities during the reporting period.

- If archaeological remains are encountered, the Permittee shall submit a report prepared by a County-approved archaeologist including recommendations for the proper disposition of the site.

- If no archaeological resources are discovered, the Qualified Archaeologist shall submit a brief letter to the Planning Division, stating that no archaeological resources were discovered and that the monitoring activities for that specified area have been completed.

- Additional documentation may be required to demonstrate that the Permittee has implemented any recommendations made by the archaeologist's report.

Timing: Prior to the issuance of a Zoning Clearance for grading, the Permittee shall:

1. Provide a copy of the signed contract to the Planning Division.
2. Obtain the Planning Division's approval of the CRCMPDP. The Permittee shall maintain the protocols set forth in the CRCMPDP as approved through construction. The Qualified Archaeologist and BVBMI Native American representative shall monitor the project site as provided in the CRCMPDP during all subsurface ground disturbing, grading, trenching, or construction activities.
3. The Qualified Archaeologist shall provide the reports weekly during all subsurface grading, trenching, or construction activities.
4. If any archaeological remains are uncovered during ground disturbance or construction activities, the Permittee shall provide the written notification to the Planning Director within three days of the discovery. The Permittee shall submit the archaeological report to the Planning Division immediately upon completion of the report.

Monitoring and Reporting: The Planning Division reviews the monitoring reports and maintains the monitoring reports in the project file. The Planning Division has the authority to conduct periodic site inspections to ensure ongoing compliance by the Permittee with this condition consistent with the requirements of § 8183-5 of the Ventura County Coastal Zoning Ordinance.

24. <u>Mitigation Measure Noise-1: Construction Noise Monitoring</u>

Purpose: In order to comply with Ventura County Construction Noise Threshold Criteria and Control Plan (adopted November 2005, amended July 2010).

Requirement: The Permittee shall provide a Construction Noise Monitoring Plan (CNMP). The CNMP shall include an evaluation of noise impacts based on equipment type, location, and duration of operation as identified in the work plan as compared to adopted thresholds. The CNMP shall include the following:

- Identify construction equipment that will be used onsite
- Locations where construction activities and equipment will be operated
- Construction activities to be undertaken (demolition, excavating, pile driving, etc.)
- Construction schedule and duration for use of equipment individually and simultaneously
- Noise-attenuating features for selected equipment (e.g. mufflers, acoustical Blankets, skirts and/or shields)
- Minimization (where feasible) of multiple pieces of equipment operating simultaneously in the "equipment restriction zone" as shown in orange in the Veneklasen Associates - Construction Noise and Vibration Assessment, July 16, 2024.
- Other best practices to the extent feasible or necessary to reduce noise below the adopted thresholds.

5. A noise assessment/noise model shall be conducted to determine if the County's thresholds are anticipated to be exceeded under implementation of the CNMP.

6. At the onset of each construction phase, and continuing periodically throughout the schedule, noise monitoring shall occur as follows:
   - Verify compliance with daytime criteria at sensitive receivers by monitoring noise levels in real time. This can be achieved by installing sound level meters at the off-site NVSR locations and the regular analysis of data, and/or;
   - Test individual pieces of equipment to confirm that instantaneous noise levels (dBA Leq1sec, slow response) do not exceed 82 dBA at a distance of 50 feet from the equipment in operation, and;
   - Confirm that noise attributed to construction activity does not exceed 80 dBA (Leq1hr) at eastern project boundary along Yerba Buena Road, and;
   - Confirm that noise attributed to construction activity does not exceed 77 dBA (Leq1hr) at southwestern project boundary adjacent to PCH and NVSR 1.
   - Project boundary noise monitoring locations are shown on (Veneklasen Associates -Construction Noise and Vibration Assessment, July 16, 2024) Figure 3 and should be between active construction areas and the nearest sensitive receivers at the perimeter of the "equipment restriction zone".
   - If noise levels (without barriers) are found to exceed thresholds, the Contractor shall implement additional controls as may be necessary. These additional controls

could include adding additional noise-reduction to the equipment itself, reduction in the number or type of equipment used in the equipment restriction zone, or construction of noise barriers, or other methods. Selection of additional controls shall be at the Contractor's discretion and subject to providing evidence to the County that sufficient reduction can be achieved via the proposed methods to reduce noise levels to the adopted threshold.

7. Where noise levels are found to exceed thresholds, additional mitigation methods shall be implemented, such as temporary noise barriers.

Physical Mitigation - Temporary Noise Barriers

To reduce noise impacts from construction activity that cannot be mitigated administratively, the Permittee shall provide temporary noise barriers in accordance with the Veneklasen Associates - Construction Noise and Vibration Assessment, dated May 7, 2024 and amended July 16, 2024 (CNVA). Practical placement of barriers is along the eastern project fence line adjacent to Yerba Buena Blvd (NVSR 9) and at the southwest project border adjacent to State Route 1 (NVSR 1) (refer to CNVA Figure 4 for location and length of barriers). The eastern barrier shall be a minimum of 12 feet high to adequately reduce noise levels at NVSR 9 to the east. The western barrier shall be a minimum of 10 feet high to adequately reduce noise levels at NVSR 1 to the southwest.

The noise barriers can be any solid material with a surface density of no less than 2 pounds per square foot or a system approved by the acoustical engineer, with a minimum height of 12 feet and 10 feet, as specified above. Materials meeting this requirement include 3/4-inch-thick wood, 3/4-inch outdoor plywood, 16-gauge steel sheet, and any masonry units or temporary sound blankets. Chain link fence affixed with temporary sound blankets can be weighed down with sandbags to prevent light wind from compromising integrity, although temporary fence bracing is likely needed for heavier winds.

Support frames should be constructed in sections which allow overlapping between barrier panels when multiples are attached. Gaps between barrier units and between the bottom edge of barrier panels at the ground shall be covered or sealed with a material having a weight of 2 pounds per square foot. These barriers will be capable of achieving a minimal Sound Transmission Class (STC) rating of 23. Use of equivalent noise barrier systems shall be reviewed and approved by the acoustical engineer. Barriers shall be erected and in place prior to the start of grading and remain in place until the completion of grading activities at Lower Camp.

The design details and materials for the temporary noise barriers and support will be prepared for approval and stamped by a Professional Engineer licensed in the state of California. The design and detailed engineering drawings/calculations of the barrier will be submitted for review and approval to the Planning Division. A separate zoning

clearance and building permit may be required for temporary noise barriers if these structures are required to be installed.

If the construction equipment utilized varies significantly from the equipment categorized in Table 7 of the CNVA, this report must be reissued, and noise abatement measures re-evaluated.

The CNPM shall implement the following best management practices:

Location of Construction Activity
Construction or equipment activity generating relatively high levels of noise shall occur as far away from noise-sensitive receptors as possible. Sensitive locations for this project are marked in Table 9 and Figure 2 of CNVA. The Equipment Restriction Zone conditions in sections 6.3 and 7.3 of the CVNA are applicable.

Ordering of Construction Activity
Construction or equipment activity generating relatively high levels of noise and vibration shall not occur at the same time and shall be spaced as far apart in time as possible from one another. In general, the loudest activities shall be reserved for the middle of the day (noon). If activities must occur simultaneously, they shall be performed as far away from one another as possible within the construction zone.

Delivery of Storage Materials and Equipment
All deliveries of material and equipment shall occur during the hours of 7:00 a.m. to 7:00 p.m. and shall not occur on weekends. The queuing of construction vehicles outside the site before 7:00 a.m. or after 7:00 p.m. is not allowed. Vehicles delivering materials and equipment shall be operated in strict conformance with regulations established by the United States Department of Transportation and all State and Local requirements.

All electrically powered or gas/diesel-driven construction equipment shall utilize sound mufflers at the exhaust and/or acoustical skirts, screens to shield the engine. These attenuating devices may be acquired at the time of leasing, rental, or purchase of equipment from the rental agency and/or manufacturer. All materials and equipment shall be stored on-site and within the confines of the construction barricades.

Stationary and Portable Equipment
Stationary and portable construction equipment will be located at positions where the noise impact to nearby noise/vibration-sensitive receptors (NVSR) is minimal. At times where the equipment cannot be positioned at a minimal noise impacting location, noise mitigation devices may need to be implemented (e.g., noise barriers and/or noise blankets as described above).

Construction Equipment Inactivity
Construction equipment shall not remain idling and inactive for relatively long periods during construction hours. All such equipment shall be turned off until use is required.

Public Announcement Systems During Construction
The use of amplified public announcement systems, speakers, and similar equipment, except for a bull horn during emergency circumstances, shall not be utilized at the project.

Radios and Alarms
Radios, music playback equipment, musical instruments, or automobile or truck alarms shall not be utilized such that they are audible beyond the boundaries of the construction zone.

Vehicle Routes
Select truck routes for material delivery and spoils disposal so that noise from heavy-duty trucks will have a minimal impact on noise sensitive receptors.

Vehicle Horns
Except as otherwise required by law, all vehicle horns shall remain silent, except in the case of an emergency.

Noise Disturbance Coordinator
Designate a "noise disturbance coordinator" who shall be responsible for responding to any complaints about construction noise. The disturbance coordinator shall determine the cause of noise complaint and institute responsible measures warranted to correct the problem. A telephone number for the disturbance coordinator shall be conspicuously posted at the construction site.

Documentation: The Permittee shall submit the Construction Noise Monitoring Plan for review and approval to the Planning Division. Temporary Noise Barriers will need to be designed by a Professional Engineer licensed in the state of California, the design and detailed engineer drawings/calculations of the barrier will need to be reviewed and approved by the Planning Division. A separate zoning clearance and building permit may be required for temporary noise barriers if these structures are required to be installed.

Timing: Prior to issuance of Zoning Clearance for grading, the Permittee shall provide a Construction Noise Monitoring Plan for review and approval.

Monitoring and Reporting: The Planning Division maintains all acoustical reports, and a written description of any corrective measures, provided by the Permittee in the project file. The Planning Division has the authority to conduct site inspections to ensure ongoing compliance with this condition, consistent with the requirements of § 8183-5 of the Ventura County Coastal Zoning Ordinance.

With the implementation of mitigation measures CR-1, Cultural Resources Construction Monitoring and Post Discovery Plan, project specific impacts to archaeological resources will be less than significant, and the proposed project will not make a cumulatively considerable contribution to a significant cumulative impact to archaeological resources.

8A-3. The proposed project is consistent with applicable Ventura County General Plan Goals and Policies and the Coastal Area Plan for Item 8a of the Ventura County Initial Study Assessment Guidelines.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
8B. Cultural Resources – Historic (Plng.)								
Will the proposed project:								
1) Demolish or materially alter in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources?	X				X			
2) Demolish or materially alter in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to Section 5020.1(k) of the Public Resources Code or its identification in a historical resources survey meeting the requirements of Section 5024.1(g) of the Public Resources Code?	X				X			
3) Demolish or materially alter in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA?	X				X			
4) Demolish, relocate, or alter an historical resource such that the significance of the historical resource will be impaired [Public Resources Code, Sec. 5020(q)]?	X				X			

Impact Discussion:

8B-1.- 8B-4. The evaluation of impacts to historical resources included review of the California Built Environment Resource Directory (BERD) which is maintained by the California Office of Historic Preservation (OHP). As stated in Stantec Memo dated September 22, 2022, no historical resources or potential historical resources were

previously identified on the Project site or within 100 feet. In total 46 out of 59 buildings were destroyed by the Woolsey fire and a flood event following the Woolsey Fire further damaged the remaining buildings. An evaluation for listing in the California Register of Historical Resources (CRHR) of 20 structures, objects and monuments. None of the 20 structures, objects, or monuments appear to be individually significant under the four CRHR Criteria 1, 2, 3, and 4, and thus, are not eligible for listing in the CRHR. The 20 resources were only evaluated for individual listing and were not evaluated as contributing/non-contributing elements to a potential historic district or cultural landscape inclusive of the whole CHK property. The property's integrity has been severely impacted by the Woolsey Fire and subsequent flood, which destroyed 46 out of a total of 59 buildings as well as numerous sheds, recreation facilities, pedestrian infrastructure, and utilities. As a result, it retains only one of the seven aspects of integrity—integrity of location. Due to a lack of integrity, CHK does not appear to be eligible for listing in the CRHR as a historic district or cultural landscape; and therefore, the 20 structures, objects, and monuments on the site were not evaluated for listing as contributing elements to the property.

As stated in Stantec Memo dated September 22, 2022, the threshold for determining significant impacts on historical resources in the State CEQA Guidelines is whether the proposed project would cause a substantial adverse change, which is defined by demolition, destruction, relocation, or alteration of the resource or its immediate vicinity such that historical resources is materially impaired (Title 14 CCR Section 15064.5[b][1]). As there are no existing building, structures, objects or monuments on the Project site or within 100 feet that meet the definition of a historical resource pursuant to CEQA, the Project would have no direct or indirect impacts to historical resources.

Mitigation/Residual Impact(s): None

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
9. Coastal Beaches and Sand Dunes								
Will the proposed project:								

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
a) Cause a direct or indirect adverse physical change to a coastal beach or sand dune, which is inconsistent with any of the coastal beaches and coastal sand dunes policies of the California Coastal Act, corresponding Coastal Act regulations, Ventura County Coastal Area Plan, or the Ventura County General Plan Goals, Policies and Programs?	X				X			
b) When considered together with one or more recently approved, current, and reasonably foreseeable probable future projects, result in a direct or indirect, adverse physical change to a coastal beach or sand dune?					X			
c) Be consistent with the applicable General Plan Goals and Policies for Item 9 of the Initial Study Assessment Guidelines?	X				X			

Impact Discussion:

9a. and 9b. The proposed project is located within the Coastal Zone/Santa Monica Mountains Overlay Zone. Lower Camp is located approximately 350 feet north of the Pacific Ocean, elevation Building 0.N is 36 feet and elevation from Building 0.N to the end of Middle Camp ranges from 36 feet to approximately 209 feet. The project does not have the potential to adversely impact a coastal beach or sand dune. Therefore, the proposed project will not create a project-specific impact and will not make a cumulatively considerable contribution to a significant cumulative impact, to coastal beaches or sand dunes.

9c. The proposed project is consistent with the applicable Ventura County General Plan Goals and Policies for Item 9 of the Ventura County Initial Study Assessment Guideline.

Mitigation/Residual Impact(s): None

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
10. Fault Rupture Hazard (PWA)								

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
Will the proposed project:								
a) Be at risk with respect to fault rupture in its location within a State of California designated Alquist-Priolo Special Fault Study Zone?	X							
b) Be at risk with respect to fault rupture in its location within a County of Ventura designated Fault Hazard Area?	X							
c) Be consistent with the applicable General Plan Goals and Policies for Item 10 of the Initial Study Assessment Guidelines?	X				X			

Impact Discussion:

Any discussion of potential impacts of seismic and geologic hazards to the proposed project is provided for informational purposes only and is neither required by CEQA nor subject to its requirements.

10a. – 10b. As indicated the Geotechnical Feasibility Report (Attachment H), the nearest fault of significance is the Malibu Coast Fault and is located approximately 4,000 feet south of the southern end of the camp. There are no known active or potentially active faults extending through the proposed project based on State of California Earthquake Fault Zones in accordance with the Alquist-Priolo Earthquake Fault Zoning Act, and Ventura County General Plan Section 7.4 Geologic and Seismic Hazards, HAZ-4.1, HAZ-4.2, and HAZ-4.17. Furthermore, no habitable structures are proposed within 50 feet of a mapped trace of an active fault. There is no impact (N) from potential fault rupture hazard.

Therefore, the project is consistent with the applicable General Plan Policy, HAZ-4.1, HAZ-4.2 (linear projects), and HAZ-4.17.

10c. The proposed project is consistent with the applicable Ventura County General Plan Goals and Policies for Item 10 of the Ventura County Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): None

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
11. Ground Shaking Hazard (PWA)								
Will the proposed project:								
a) Be built in accordance with all applicable requirements of the Ventura County Building Code?		X						
b) Be consistent with the applicable General Plan Goals and Policies for Item 11 of the Initial Study Assessment Guidelines?	X				X			

Impact Discussion:

The hazards from ground shaking will affect each project individually; and no cumulative ground shaking hazard will occur as a result of other approved, proposed, or probable projects.

Any discussion of potential impacts of seismic and geologic hazards to the proposed project is provided for informational purposes only and is neither required by CEQA nor subject to its requirements.

11a. and 11b. As described in the Geotechnical Feasibility Report (Attachment H), the alluvium that underlies the majority of the anticipated building areas is typically considered to have a probable maximum intensity of earthquake response of approximately IX of the Modified Mercalli Scale, the highest observed intensity of ground response has been V to VI in the Solromar/PointMugu area. The property will be subject to moderate to strong ground shaking from seismic events on local and regional fault systems. The County of Ventura Building code adopted from the California Building Code, requires structures be designed to withstand this ground shaking. The seismic design will need to be updated to the building code in effect at the time the application for a building permit is submitted. The requirements of the building code will reduce the effects of ground shaking to less than significant (LS).

Therefore, the project is consistent with applicable Ventura County General Plan Goals and Policies for Item 11 of the Ventura County Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): None

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
12. Liquefaction Hazards (PWA)								
Will the proposed project:								
a) Expose people or structures to potential adverse effects, including the risk of loss, injury, or death involving liquefaction because it is located within a Seismic Hazards Zone?		X						
b) Be consistent with the applicable General Plan Goals and Policies for Item 12 of the Initial Study Assessment Guidelines?		X			X			

Impact Discussion:

The hazards from liquefaction will affect each project individually. No cumulative liquefaction hazard would occur as a result of other projects.

Any discussion of potential impacts of seismic and geologic hazards to the proposed project is provided for informational purposes only and is neither required by CEQA nor subject to its requirements.

12a. and 12b. Portions of the property are located within a potential liquefaction zone based on the State of California Seismic Hazards Maps for the County of Ventura. Specifically, as state in the Geotechnical Feasibility Report (Attachment H), the majoriy of the flat-lying areas adjacent to Little Sycamore Creek are designated as Liquefaction Hazards Zones that will require evaluation of the hazard if structures are proposed within these zones. The Ventura County General Plan Chapter 7, HAZ-4.8, requires the county to not allow development of habitable structures within areas prone to liquefaction unless a geotechnical engineering report is performed, and sufficient safeguards are incorporated. Mitigation measures will be necessary as part of a building permit application process in accordance with the Ventura County Building Code adopted from the California Building Code, dated 2022, Chapter 18, Section 1803.3. In this regard the potential hazards resulting from liquefaction are considered to be less than significant (LS).

Therefore, the proposed project is consistent with the applicable Ventura County General Plan Goals and Policies for Item 12 of the Ventura County Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): None

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
13. Seiche and Tsunami Hazards (PWA)								
Will the proposed project:								
a) Be located within about 10 to 20 feet of vertical elevation from an enclosed body of water such as a lake or reservoir?	X							
b) Be located in a mapped area of tsunami hazard as shown on the County General Plan maps?	X							
c) Be consistent with the applicable General Plan Goals and Policies for Item 13 of the Initial Study Assessment Guidelines?	X				X			

Impact Discussion:

The hazards from seiche and tsunami will affect each project individually; and no cumulative seiche and tsunami hazard will occur as a result of other approved, proposed, or probable projects.

Any discussion of potential impacts of seiche and tsunami hazards to the proposed project is provided for informational purposes only and is neither required by CEQA nor subject to its requirements.

13a. The site is not located adjacent to a closed or restricted body of water based on aerial imagery review (RMA GIS 2024) and is not subject to seiche hazard. There is no hazard from potential seiche and no impact (N) to the proposed project.

13b. The project is not mapped within a tsunami inundation zone based on the Ventura County General Plan, Chapter 7, Section HAZ-2.7 and Ventura County General Plan Background Report Section 11.2, Figure 11.9. There is no impact (N) from potential hazards from tsunami.

13c. The proposed project is consistent with the applicable Ventura County General Plan Goals and Policies for Item 9 of the Ventura County Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): None

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
14. Landslide/Mudflow Hazard (PWA)								
Will the proposed project:								
a) Result in a landslide/mudflow hazard, as determined by the Public Works Agency Certified Engineering Geologist, based on the location of the site or project within, or outside of mapped landslides, potential earthquake induced landslide zones, and geomorphology of hillside terrain?			X					
b) Be consistent with the applicable General Plan Goals and Policies for Item 14 of the Initial Study Assessment Guidelines?			X		X			

Impact Discussion:
The hazards from landslides/mudslides will affect each project individually; and no cumulative landslide/mudslide hazard will occur as a result of other approved, proposed, or probable projects.

Any discussion of potential impacts of seismic and geologic hazards to the proposed project is provided for informational purposes only and is neither required by CEQA nor subject to its requirements.

14a. The site is located in a hillside area and portions of the property are located in mapped landslide zones and also in potential earthquake induced landslide areas. Based on analysis conducted by the California Geological Survey as part of California Seismic Hazards Mapping Act, 1991, Public Resources Code Sections 2690-2699.6, portions of the slopes within the property are within potential seismically induced landslide zones. A map showing the location of Deep-Seated Landslide Area is included as Figure 11-3 in the Ventura County General Plan Background Report, Section 11.1. The Geotechnical Feasibility Report (Attachment H), dated February 25, 2020, and also July 8, 2020, evaluated stability of the slopes within the project area and provided mitigation measures to achieve acceptable factors of safety for development. In other areas of the project, mitigations are recommended to reduce rockfall and debris flow hazards in the December 8, 2020 report. In this regard, the landslide hazard is considered to be potentially significant without geotechnical recommendations and/or mitigations incorporated .

14b. Therefore, the project is consistent with the applicable General Plan Policies, HAZ-4.4, HAZ-4.9, HAZ 4-10, and HAZ-4.11.

The proposed project is consistent with the applicable Ventura County General Plan Goals and Policies for Item 14 of the Ventura County Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): None

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
15. Expansive Soils Hazards (PWA)								
Will the proposed project:								
a) Expose people or structures to potential adverse effects, including the risk of loss, injury, or death involving soil expansion because it is located within a soils expansive hazard zone or where soils with an expansion index greater than 20 are present?		X						
b) Be consistent with the applicable General Plan Goals and Policies for Item 15 of the Initial Study Assessment Guidelines?		X			X			

Impact Discussion:

The hazards from expansive soils will affect each project individually; and no cumulative expansive soils hazard will occur as a result of other approved, proposed, or probable projects.

15a. The expansion range of the soils in the project area for structures will be mitigated to less than significant by implementation of the Ventura County Building Code. Future development of the site will be subject to the requirements of the County of Ventura General Plan, Section 7.4, Policy HAZ-4.13, and County of Ventura Building code adopted from the California Building Code, in effect at time of building that require mitigation of potential adverse effects of expansive soils. The hazard associated with adverse effects of expansive soils is considered to be less than significant .

15b. Therefore, the project is consistent with the applicable General Plan Policy HAZ-4.13. The proposed project is consistent with the applicable Ventura County General Plan Goals and Policies for Item 15 of the Ventura County Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): None

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
16. Subsidence Hazard (PWA)								
Will the proposed project:								
a) Expose people or structures to potential adverse effects, including the risk of loss, injury, or death involving subsidence because it is located within a subsidence hazard zone?	X							
b) Be consistent with the applicable General Plan Goals and Policies for Item 16 of the Initial Study Assessment Guidelines?	X				X			

Impact Discussion:

The hazards from subsidence will affect each project individually; and no cumulative subsidence hazard will occur as a result of other approved, proposed, or probable projects.

16a. The project does not propose the construction of new extraction wells or is within an area known for subsidence hazard (County of Ventura General Plan, Section 7.4, Policies HAZ-4.14, 4.15, 4.16). Therefore, the project is considered to have no impact (N) on the hazard of subsidence.

16b. Therefore, the project is consistent with the applicable General Plan Policies HAZ-4.14, HAZ-4.15, and HAZ-4.16. The proposed project is consistent with the applicable Ventura County General Plan Goals and Policies for Item 16 of the Ventura County Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): None

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
17a. Hydraulic Hazards – Non-FEMA (PWA)								
Will the proposed project:								

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
1) Result in a potential erosion/siltation hazard and flooding hazard pursuant to any of the following documents (individually, collectively, or in combination with one another): • 2007 Ventura County Building Code Ordinance No.4369 • Ventura County Land Development Manual • Ventura County Subdivision Ordinance • Ventura County Coastal Zoning Ordinance • Ventura County Non-Coastal Zoning Ordinance • Ventura County Standard Land Development Specifications • Ventura County Road Standards • Ventura County Watershed Protection District Hydrology Manual • County of Ventura Stormwater Quality Ordinance, Ordinance No. 4142 • Ventura County Hillside Erosion Control Ordinance, Ordinance No. 3539 and Ordinance No. 3683 • Ventura County Municipal Storm Water NPDES Permit • State General Construction Permit • State General Industrial Permit • National Pollutant Discharge Elimination System (NPDES)?		X				X		
2) Be consistent with the applicable General Plan Goals and Policies for Item 17A of the Initial Study Assessment Guidelines?		X				X		

Impact Discussion:

17A-1. The Hydrology and Hydraulics Study for Sycamore Creek (Attachment K) and Preliminary Drainage & Stormwater Treatment Report (Attachment L) include analysis that demonstrates no increase in peak flow rates or runoff volume due to development, and no increase in the 100-year water surface elevations off-site of the project area. Proposed drainage improvements will convey and release stormwater in a manner as to not cause an adverse impact downstream in velocity or duration in accordance with the Ventura County Building Code.

17A-2. Per the hydrology (Attachment K) and stormwater reports (Attachment L) included in the project submittal, the proposed storm water runoff volumes in Little Sycamore Creek will not exceed existing conditions. Future construction will be completed according to current codes and standards. Therefore, the project is consistent with the applicable General Plan Goals and Policies for Item 17a of the Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): None

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
17b. Hydraulic Hazards – FEMA (WPD)								
Will the proposed project:								
1) Be located outside of the boundaries of a Special Flood Hazard Area and entirely within a FEMA-determined 'X-Unshaded' flood zone (beyond the 0.2% annual chance floodplain: beyond the 500-year floodplain)?		X			X			
2) Be located outside of the boundaries of a Special Flood Hazard Area and entirely within a FEMA-determined 'X-Shaded' flood zone (within the 0.2% annual chance floodplain: within the 500-year floodplain)?		X			X			
3) Be located, in part or in whole, within the boundaries of a Special Flood Hazard Area (1% annual chance floodplain: 100-year), but located entirely outside of the boundaries of the Regulatory Floodway?		X			X			
4) Be located, in part or in whole, within the boundaries of the Regulatory Floodway, as determined using the 'Effective' and latest available DFIRMs provided by FEMA?		X			X			
5) Be consistent with the applicable General Plan Goals and Policies for Item 17B of the Initial Study Assessment Guidelines?		X			X			

Impact Discussion:

17B-1. – 17B-4. Most of the project improvements are in a location identified by the Federal Emergency Management Agency (FEMA) as an area of minimal flood hazard Zone X unshaded. This is evidenced on FEMA Map Panels 06111C1130E and

06111C1140E, both effective Januarys 20, 2010. The proposed development within this area is therefore deemed to be Less than Significant for Hydraulic Hazards - FEMA.
There is a small portion of the southern parcel (APN: 7000070450) that is identified as an area of Special Flood Hazard (SFHA) Zone A. This is evidenced on FEMA Map Panels 06111C1140E effective January 20, 2010. Therefore, any proposed improvements within SFHA Zone A, including, but not limited to grading or paving activities, will be required to comply with the County of Ventura Floodplain Development Ordinance which provides minimum standards for development in the SFHA. The proposed development will be conditioned to obtain a Floodplain Development Permit for development within SFHA Zone A. Therefore, the proposed project is deemed to be Less than Significant for Hydraulic Hazards – FEMA.

Condition of Approval: Floodplain Development Permit

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

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

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

Timing: The Floodplain Development Permit shall be obtained by the Applicant prior to Zoning Clearance for Use Inauguration.

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

Condition of Approval: Notice of Flood Hazard Recorded on Property Title

Purpose: To comply with the Ventura County General Plan Policy HAZ-2.5 to inform existing and future owners of the subject property that the site, in whole or in part, has currently been mapped by the Federal Emergency Management Agency (FEMA) as being in a Special Flood Hazard Area.

Requirement: The Permittee shall, with the assistance of the Ventura County Public Works Agency Floodplain Manager, have recorded on the title of the subject property a Notice of Flood Hazard.

Documentation: A Notice of Flood Hazard deemed satisfactory to the Ventura County Public Works Agency Floodplain Manager.

Timing: The Notice of Flood Hazard shall be recorded on title of the subject property by the Applicant prior to Zoning Clearance for Use Inauguration.

Monitoring and Reporting: A copy of the recorded Notice of Flood Hazard shall be provided to the Building and Safety Department as well as maintained in the case file by the Public Works Agency.

17B-5. Therefore, the project is consistent with the applicable General Plan Goals and Policies for Item 17b of the Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): None

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
18. Fire Hazards (VCFPD)								
Will the proposed project:								
a) Be located within High Fire Hazard Areas/Fire Hazard Severity Zones or Hazardous Watershed Fire Areas?		X				X		
b) Be consistent with the applicable General Plan Goals and Policies for Item 18 of the Initial Study Assessment Guidelines?		X				X		

Impact Discussion:

18a. and 18b. The project is in a Very High Fire Hazard Severity Zone, Very High within a State Responsibility Area. The project will be required to comply with all applicable Federal, State, and local regulations and the requirements of the Ventura County Building Code and the Ventura County Fire Code including fuel modification requirements.

Therefore, the project is consistent with the applicable General Plan Goals and Policies for Item 18b of the Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): None

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
19. Aviation Hazards (Airports)								

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
Will the proposed project:								
a) Comply with the County's Airport Comprehensive Land Use Plan and pre-established federal criteria set forth in Federal Aviation Regulation Part 77 (Obstruction Standards)?	X				X			
b) Will the proposed project result in residential development, a church, a school, or high commercial business located within a sphere of influence of a County airport?	X				X			
c) Be consistent with the applicable General Plan Goals and Policies for Item 19 of the Initial Study Assessment Guidelines?	X				X			

Impact Discussion:

19a. and 19b. The proposed project is not located within an Airport Sphere of Influence. The proposed project will not involve any obstruction of navigable airspace. The proposed project will not have a significant project-specific impact and will not make a cumulatively considerable contribution to a significant cumulative impact related to aviation hazards.

19c. The proposed project is consistent with the applicable Ventura County General Plan Goals and Policies for Item 19 of the Ventura County Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): None

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
20a. Hazardous Materials/Waste – Materials (EHD/Fire)								
Will the proposed project:								
1) Utilize hazardous materials in compliance with applicable state and local requirements as set forth in Section 20a of the Initial Study Assessment Guidelines?		X				X		

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
2) Be consistent with the applicable General Plan Goals and Policies for Item 20a of the Initial Study Assessment Guidelines?		X				X		

Impact Discussion:

20a-1. The proposed project includes the continued use and storage of hazardous materials such as propane and gasoline. The existing business maintains an active permit to operate (permit number FA0032193) issued by Ventura County Environmental Health Division (EHD)/Certified Unified Program Agency (CUPA). A Hazardous Materials Business Plan (HMBP) for reportable hazardous materials was electronically submitted to the California Environmental Reporting System (CERS) on January 30, 2024 (CERS ID 10454860). The project may involve relocation of hazardous materials during and after construction. The Permittee is required to update the HMBP in CERS with these changes to remain in compliance with state law and to facilitate emergency responders during incident. Improper storage, handling, and disposal of potentially hazardous materials may result in the creation of adverse impacts to the environment. Compliance with applicable state and local regulations will reduce potential project specific impacts to less-than-significant levels.

20a-2. The proposed project will be consistent with the General Plan for Item 20a of the Initial Study Assessment Guidelines provided the business maintains compliance with all applicable laws and regulations related to hazardous materials handling, storage, and disposal.

Mitigation/Residual Impact(s): None

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
20b. Hazardous Materials/Waste – Waste (EHD)								
Will the proposed project:								

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
1) Comply with applicable state and local requirements as set forth in Section 20b of the Initial Study Assessment Guidelines?	X				X			
2) Be consistent with the applicable General Plan Goals and Policies for Item 20b of the Initial Study Assessment Guidelines?	X				X			

Impact Discussion:

20b-1. The proposed project is a rebuild and operation of an organized camp and will not generate hazardous waste which requires a Ventura County Environmental Health Division/Certified Unified Program Agency permit. The storage, handling, and disposal of any medical waste shall be in compliance with applicable state regulations. The business shall obtain and maintain an active medical waste generator permit from Ventura County EHD/CUPA. No project specific or cumulative impact related to hazardous waste is expected.

20b-2. The proposed project will not generate hazardous waste and is consistent with the General Plan for Item 20b of the Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): None

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
21. Noise and Vibration								
Will the proposed project:								

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
a) Either individually or when combined with other recently approved, pending, and probable future projects, produce noise in excess of the standards for noise in the Ventura County General Plan Goals, Policies and Programs (Section 2.16) or the applicable Area Plan?		X				X		
b) Either individually or when combined with other recently approved, pending, and probable future projects, include construction activities involving blasting, pile-driving, vibratory compaction, demolition, and drilling or excavation which exceed the threshold criteria provided in the Transit Noise and Vibration Impact Assessment (Section 12.2)?			X			X		
c) Result in a transit use located within any of the critical distances of the vibration-sensitive uses listed in Table 1 (Initial Study Assessment Guidelines, Section 21)?	X				X			
d) Generate new heavy vehicle (e.g., semi-truck or bus) trips on uneven roadways located within proximity to sensitive uses that have the potential to either individually or when combined with other recently approved, pending, and probable future projects, exceed the threshold criteria of the Transit Use Thresholds for rubber-tire heavy vehicle uses (Initial Study Assessment Guidelines, Section 21-D, Table 1, Item No. 3)?	X				X			
e) Involve blasting, pile-driving, vibratory compaction, demolition, drilling, excavation, or other similar types of vibration-generating activities which have the potential to either individually or when combined with other recently approved, pending, and probable future projects, exceed the threshold criteria provided in the Transit Noise and Vibration Impact Assessment [Hanson, Carl E., David A. Towers, and Lance D. Meister. (May 2006) Section 12.2]?		X				X		

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
f) Be consistent with the applicable General Plan Goals and Policies for Item 21 of the Initial Study Assessment Guidelines?	X				X			

Impact Discussion:

21a. The Ventura County Initial Study Assessment Guidelines define noise sensitive uses as dwellings, schools, hospitals, nursing homes, churches, and libraries. The camp structures with overnight accommodation can be considered a noise sensitive use. Only the southern portion of lower camp, adjacent to State Route 1 (Pacific Coast Highway) is located within the CNEL 60dB(A) noise contour as mapped in the Resource Management Agency Geographic Information System (RMA GIS 2024) noise contour maps, no camp noise sensitive uses are within the noise contour.

The proposed outdoor events may involve the use of Public Address (P.A.) systems and amplified music. Therefore, the applicant retained Advanced Engineering Acoustics (AEA) to prepare a noise study that analyzed the proposed project's impacts (Attachment I).

The significance thresholds that AEA used when preparing the noise study were based on the maximum acceptable noise levels that are set forth in the Ventura County General Plan Goals, Policies and Programs Noise Policy 2.16.2-1(4) and are also the significance thresholds set forth in the Ventura County Initial Study Assessment Guidelines (2011). More specifically, the proposed project will create a significant noise impact if the proposed project generates noise that exceeds:

- Leq1H of 55 dBA or ambient noise level plus 3 dBA, whichever is greater, during any hour from 6:00 AM to 7:00 PM.
- Leq1H of 50 dBA or ambient noise levels plus 3 dBA, whichever is greater, during any hour from 7:00 PM to 10:00 PM; or
- Leq1H of 45 dBA or ambient noise level plus 3dBA, whichever is greater, during any hour from 10:00 PM to 6:00 AM.

As part of the noise study, AEA used the SoundPLAN Community Noise Model computer program to investigate the potential effects of noisy activities and off-season non-camp affiliated events. Additionally, combined music and P.A. system sound sources were modeled using the ISO 9613-part 2 environmental sound propagation standard; input and output results were adjusted and calibrated to be in compliance with County noise codes. The results of all modeled music and P.A. sources output and source monitoring sites show noise levels below 55 dB for all residential uses and noise levels of 71.5, 76.5, 81.7

dB for proposed source noise monitoring sites (50 feet from loudspeakers or bullhorn sources). Additionally, the project will be subject to condition of approval to resolve noise complaints during temporary outdoor events and minimize noise related impacts.

Either individually or when combined with other recently approved, pending, and probable future projects, produce noise in excess of the standards for noise in the Ventura County General Plan Goals, Policies and Programs (Section 2.16).

21b. A Construction Noise and Vibration Impact Assessment was prepared by Veneklasen Associates, May 2024, updated July 16, 2024 (Attachment J). Construction activities were separated into 4 phases: Phase 1 (demolition); 3 months, Phase 2 (excavation, grading and site utilities); 9 months, Phase 3 (concrete walkways and paving); 6 months, Phase 4 (exterior encloser, roofing and interior finishing); 20 months. Noise sensitive receptors are located to the south, east, southeast and southwest of lower and middle camp. The daytime construction activity noise threshold criteria is 55 Leq(h), dBA if construction is longer than 8 weeks. Noise exposure and vibration levels from construction equipment were modeled using Predictor version 2023, 3D Noise Simulation software at each noise-sensitive receptor. Results for continuous equipment noise levels exceeded County noise standards for three noise sensitive use locations (Attachment J, Table 10). Potentially significant noise impacts related to construction will be reduced to less than significant with the implementation of MM Noise-1 (Construction Noise Monitoring Plan).

21c. The proposed project does not involve the introduction of a new transit use within a critical distance from a vibration-sensitive use. Therefore, the proposed project will not have a project-specific impact and will not make a cumulatively considerable contribution to a significant cumulative impact, related to the creation of a transit use located within any of the critical distances of the vibration-sensitive uses listed in Table 1 of the Ventura County Initial Study Assessment Guidelines.

21d. The proposed project will result in a maximum of 60 events per year. While additional cars or buses may be used to transport event guests to the project site, all parking of such vehicles will be located on the proposed project site. Since the proposed project will result in a limited number of events, the project will not exceed the threshold criteria of the Transit Use Thresholds for rubber-tire heavy vehicle uses. Therefore, the proposed project will not have a significant project-specific impact or make a cumulatively considerable contribution to a significant cumulative impact, related to vibration and noise impacts from new heavy vehicle trips.

21e. The proposed project will include pile-driving, vibratory compaction, demolition, drilling, excavation, or other similar types of vibration-generating activities. The main concern for vibration generated by ground-disturbing construction activities is the potential for architectural/structural damage to adjacent development . The County does not have a vibration impact criterion for construction activities, therefore, the Federal Transit Administration (FTA) guidelines to minimize vibration impact to people, residence and business were used. Vibration levels were modeled for the construction equipment

assumed to be used at the project site. Vibration levels for various equipment were assumed to be equivalent to similar equipment specified in the FTA Transit Noise and Vibration Guidance Manual. Vibration limits for structures are assessed using the peak particle velocity metric. This metric refers to the maximum speed of a particle as it oscillates about a point of equilibrium that is moved by a passing wave. For construction activities related to all phases, projected PPV levels at each sensitive receptor are anticipated to meet the FTA criteria (Attachment J). Therefore, the project will not have the potential to create prolonged annoyance or damage from construction vibration. Additionally, the project will be required to comply with the standard condition of approval that will prohibit construction noise generating activities during nighttime hours.

Condition of Approval: Construction Noise

Purpose: In order for this project to comply with the Ventura County General Plan *Goals, Policies and Programs* Noise Compatibility Standards Policy HAZ-9.2 and the County of Ventura Construction Noise Threshold Criteria and Control Plan (Amended 2010).

Requirement: The Permittee shall limit construction activity for site preparation and development to the hours between 7:00 a.m. and 7:00 p.m., Monday through Friday, and from 9:00 a.m. to 7:00 p.m. Saturday, Sunday, and State holidays. Construction equipment maintenance shall be limited to the same hours. Non-noise generating construction activities such as interior painting are not subject to these restrictions.

Documentation: The Permittee shall post a sign stating these restrictions in a conspicuous location on the Project site, in order so that the sign is visible to the general public. The Permittee shall provide photo documentation showing posting of the required signage to the Planning Division, prior to the commencement of grading and construction activities. The sign must provide a telephone number of the site foreman, or other person who controls activities on the jobsite, for use for complaints from the public. The Permittee shall maintain a "Complaint Log," noting the date, time, complainant's name, complaint, and any corrective action taken, in the event that the Permittee receives noise complaints. The Permittee must submit the "Complaint Log" to the Planning Division upon the Planning Director's request.

Timing: The Permittee shall install the sign prior to the issuance of Zoning Clearance for construction and throughout all grading and construction activities. The Permittee shall maintain the signage on-site until all grading and construction activities are complete. If the Planning Director requests the Permittee to submit the "Complaint Log" to the Planning Division, the Permittee shall submit the "Complaint Log" within one day of receiving the Planning Director's request.

Monitoring and Reporting: The Planning Division reviews, and maintains in the Project file, the photo documentation of the sign and the "Complaint Log." The Planning Division has the authority to conduct site inspections and take enforcement actions to ensure that the Permittee conducts grading and construction activities in compliance with this

condition, consistent with the requirements of Section 8183-5 of the Ventura County Coastal Zoning Ordinance.

Condition of Approval – Construction Vibration Investigation

Purpose: To ensure the project complies Federal Transportation Administration Transit Noise and Vibration Guidance Manual.

Requirement: The Permittee shall use the list of construction equipment and implement the equipment operational best practices and recommendations contained in Construction Noise and Vibration Impact Assessment by Veneklasen Associates, dated July 16, 2024.

Documentation: Designate a person responsible for registering and investigating claims of excessive vibration. The contact information of such a person shall be clearly posted on the construction site.

Timing: The Permittee shall provide the Planning Division the contact designee and photo-documentation of posted information prior to issuance of Zoning Clearance for construction.

Monitoring and Reporting:

Noise and vibration monitors shall be placed at the sensitive receptors to monitor construction activities so that either the General Contractor or a third party acoustical consultant can ensure the project thresholds are met. Real-time alerts must be sent to the Contractor in case of threshold exceedances. In case of exceedances, work must stop, and the source of the exceedance must be identified, and the required mitigation measure should be incorporated. Appendix C of the County of Ventura Construction Noise Threshold Criteria and Control Plan provide guidelines to follow during noise measurements, and Figure C-1 is a noise measurement report form (Part A and B) to be used for documenting the noise measurement. Refer to Construction Noise Monitoring Plan above for more information.

The sign must provide a telephone number of the noise disturbance coordinator, and the site foreman, or other person who controls activities on the jobsite, for use for complaints from the public.

Condition of Approval – Resolution of Noise Complaints for Temporary Outdoor Events

Purpose: In order to resolve noise complaints during temporary outdoor events and minimize noise related impacts.

Requirement: The Permittee shall provide the Planning Director and all residents within 300 feet of the parcel boundary, with the name, title, address, and phone number of the Permittee, or Permittee's designee, who will be responsible for ensuring condition and code compliance during temporary outdoor events at the project site.

The Permittee, or the Permittee's designee, must use the following process to resolve noise complaints received during temporary outdoor events:

a. Immediately investigate the complaint and take the following actions (as applicable) to abate the noise complaint:

    1. lower speaker volumes of public address (PA) systems and/or amplified music below the maximum allowed (90 dBA at 50 feet from the source of amplified music)
    2. discontinue the use of PA systems;
    3. discontinue the use of amplified music and replace with acoustical music; and/or
    4. alter the timing and sequence of wedding event activities to comply with the maximum noise standards.

b. Report back to the complaining party by telephone about the findings of the investigation and the abatement actions taken, if any, as soon as possible, but no later than 15 minutes after receiving the complaint, unless otherwise agreed to by the complainant.

c. Provide written notification to the Planning Director of the complaint, within 10 days of receiving a noise complaint. The notice shall indicate: (1) the date and time of the complaint(s); (2) a description of the complaint; and (3) the name, address, and phone number of the complainant(s).

The Permittee shall take all reasonable actions to prevent noise from adversely affecting nearby residents. If the problem persists, the Planning Director may initiate actions to prevent further complaints, including (but not limited to) the use of a noise consultant, at the Permittee's expense, to monitor the event noise and implement measures to achieve compliance with the maximum noise levels (90 dBA at 50 feet from the source of amplified music). If the Permittee's actions fail to curtail noise complaints, the Planning Director may modify this CUP to disallow event activities that adversely affect nearby sensitive receptors.

Documentation: The Permittee must maintain current contact information for the Permittee or Permittee's designee and supply the current contact information to the County Planning Division.

Timing: Prior to the issuance of a Zoning Clearance for use inauguration, and annually on June 1st thereafter, the Permittee shall provide the Planning Division updated contact information for the individual who will be responsible for ensuring condition and code compliance during temporary outdoor events at the Project site. The Permittee, or Permittee's designee, shall be available for contact during events. If the contact information should change prior to the mandatory annual update, the Permittee shall provide the residents and Planning Director with the new information prior to the next

event. The Permittee shall notify the Planning Director in writing within 10 days of receiving a noise complaint.

Monitoring and Reporting: The Planning Division maintains the Permittee's, or Permittee's designee's, contact information in the Project file. The Permittee shall provide the Planning Division notice of any complaints associated with the events to be maintained in the Project file. In the event that complaints go on unabated, the Planning Director has the authority to review any complaints received by the Planning Division to determine whether this CUP should be modified or revoked. The Planning Division has the authority to conduct site inspections and take enforcement actions to ensure that the Permittee conducts the temporary outdoor events in compliance with this condition, consistent with the requirements of this conditions.

Condition of Approval – Temporary Outdoor Events Report

Purpose: The purpose of this condition is to ensure that the Permittee conducts the temporary outdoor events in compliance with the requirements of this CUP.

Requirement: The Permittee shall maintain an Events Report, on a form that the Planning Division will provide to the Permittee, in order to record the following for each temporary event:

a. A brief description of the type of temporary event (e.g., wedding event);

b. The scheduled date and hours of the temporary event;

c. The number of attendees;

d. If a temporary event involves greater than 75 attendees the number of security guards provided at the event,; and

d. Whether noise complaints were received and resolved as required pursuant to the Resolution of Noise Complaints for Temporary Outdoor Events Condition (above).

The Permittee shall complete and maintain the Events Report, and submit the Events Report to the Planning Division annually on or before February 1, at any time upon the written request of the Planning Director, and with an application for CUP renewal.

Documentation: The Permittee shall complete and maintain the Events Report form provided by the Planning Division.

Timing: The Permittee must submit the Events Report form to the Planning Division: annually on or before February 1; within 24 hours of receiving a request from the Planning Director to submit the form; and with an application for CUP renewal.

Monitoring and Reporting: The Planning Division reviews and maintains in the Project file, the Events Report forms. If the Events Report forms indicate that the temporary outdoor events were conducted in violation of the conditions of this CUP, the Planning

Division has the authority to implement enforcement actions consistent with the regulations of Article 13 of the Ventura County Coastal Zoning Ordinance.

21f. The proposed project is consistent with the applicable Ventura County General Plan Goals and Policies for Item 21 of the *Ventura County Initial Study Assessment Guidelines*.

Mitigation/Residual Impact(s)

Mitigation Measure Noise-1: Construction Noise Monitoring
Purpose: In order to comply with Ventura County Construction Noise Threshold Criteria and Control Plan (adopted November 2005, amended July 2010).

Requirement: The Permittee shall provide a Construction Noise Monitoring Plan (CNMP). The CNMP shall include an evaluation of noise impacts based on equipment type, location, and duration of operation as identified in the work plan as compared to adopted thresholds. The CNMP shall include the following:

- Identify construction equipment that will be used onsite
- Locations where construction activities and equipment will be operated
- Construction activities to be undertaken (demolition, excavating, pile driving, etc.)
- Construction schedule and duration for use of equipment individually and simultaneously
- Noise-attenuating features for selected equipment (e.g. mufflers, acoustical Blankets, skirts and/or shields)
- Minimization (where feasible) of multiple pieces of equipment operating simultaneously in the “equipment restriction zone” as shown in orange in the Veneklasen Associates - Construction Noise and Vibration Assessment, July 16, 2024.
- Other best practices to the extent feasible or necessary to reduce noise below the adopted thresholds.

1. A noise assessment/noise model shall be conducted to determine if the County’s thresholds are anticipated to be exceeded under implementation of the CNMP.

2. At the onset of each construction phase, and continuing periodically throughout the schedule, noise monitoring shall occur as follows:

- Verify compliance with daytime criteria at sensitive receivers by monitoring noise levels in real time. This can be achieved by installing sound level meters at the off-site NVSR locations and the regular analysis of data, and/or;
- Test individual pieces of equipment to confirm that instantaneous noise levels (dBA Leq1sec, slow response) do not exceed 82 dBA at a distance of 50 feet from the equipment in operation, and;
- Confirm that noise attributed to construction activity does not exceed 80 dBA (Leq1hr) at eastern project boundary along Yerba Buena Road, and;

- Confirm that noise attributed to construction activity does not exceed 77 dBA (Leq1hr) at southwestern project boundary adjacent to PCH and NVSR 1.
- Project boundary noise monitoring locations are shown on (Veneklasen Associates -Construction Noise and Vibration Assessment, July 16, 2024) Figure 3 and should be between active construction areas and the nearest sensitive receivers at the perimeter of the “equipment restriction zone”.
- If noise levels (without barriers) are found to exceed thresholds, the Contractor shall implement additional controls as may be necessary. These additional controls could include adding additional noise-reduction to the equipment itself, reduction in the number or type of equipment used in the equipment restriction zone, or construction of noise barriers, or other methods. Selection of additional controls shall be at the Contractor’s discretion and subject to providing evidence to the County that sufficient reduction can be achieved via the proposed methods to reduce noise levels to the adopted threshold.

3. Where noise levels are found to exceed thresholds, additional mitigation methods shall be implemented, such as temporary noise barriers.

Physical Mitigation - Temporary Noise Barriers

To reduce noise impacts from construction activity that cannot be mitigated administratively, the Permittee shall provide temporary noise barriers in accordance with the Veneklasen Associates - Construction Noise and Vibration Assessment, dated May 7, 2024 and amended July 16, 2024 (CNVA). Practical placement of barriers is along the eastern project fence line adjacent to Yerba Buena Blvd (NVSR 9) and at the southwest project border adjacent to State Route 1 (NVSR 1) (refer to CNVA Figure 4 for location and length of barriers). The eastern barrier shall be a minimum of 12 feet high to adequately reduce noise levels at NVSR 9 to the east. The western barrier shall be a minimum of 10 feet high to adequately reduce noise levels at NVSR 1 to the southwest.

The noise barriers can be any solid material with a surface density of no less than 2 pounds per square foot or a system approved by the acoustical engineer, with a minimum height of 12 feet and 10 feet, as specified above. Materials meeting this requirement include 3/4-inch-thick wood, 3/4-inch outdoor plywood, 16-gauge steel sheet, and any masonry units or temporary sound blankets. Chain link fence affixed with temporary sound blankets can be weighed down with sandbags to prevent light wind from compromising integrity, although temporary fence bracing is likely needed for heavier winds.

Support frames should be constructed in sections which allow overlapping between barrier panels when multiples are attached. Gaps between barrier units and between the bottom edge of barrier panels at the ground shall be covered or sealed with a material having a weight of 2 pounds per square foot. These barriers will be capable of achieving a minimal Sound Transmission Class (STC) rating of 23. Use of equivalent noise barrier

systems shall be reviewed and approved by the acoustical engineer. Barriers shall be erected and in place prior to the start of grading and remain in place until the completion of grading activities at Lower Camp.

The design details and materials for the temporary noise barriers and support will be prepared for approval and stamped by a Professional Engineer licensed in the state of California. The design and detailed engineering drawings/calculations of the barrier will be submitted for review and approval to the Planning Division. A separate zoning clearance and building permit may be required for temporary noise barriers if these structures are required to be installed.

If the construction equipment utilized varies significantly from the equipment categorized in Table 7 of the CNVA, this report must be reissued, and noise abatement measures re-evaluated.

The CNPM shall implement the following best management practices:

Location of Construction Activity
Construction or equipment activity generating relatively high levels of noise shall occur as far away from noise-sensitive receptors as possible. Sensitive locations for this project are marked in Table 9 and Figure 2 of CNVA. The Equipment Restriction Zone conditions in sections 6.3 and 7.3 of the CVNA are applicable.

Ordering of Construction Activity
Construction or equipment activity generating relatively high levels of noise and vibration shall not occur at the same time and shall be spaced as far apart in time as possible from one another. In general, the loudest activities shall be reserved for the middle of the day (noon). If activities must occur simultaneously, they shall be performed as far away from one another as possible within the construction zone.

Delivery of Storage Materials and Equipment
All deliveries of material and equipment shall occur during the hours of 7:00 a.m. to 7:00 p.m. and shall not occur on weekends. The queuing of construction vehicles outside the site before 7:00 a.m. or after 7:00 p.m. is not allowed. Vehicles delivering materials and equipment shall be operated in strict conformance with regulations established by the United States Department of Transportation and all State and Local requirements.

All electrically powered or gas/diesel-driven construction equipment shall utilize sound mufflers at the exhaust and/or acoustical skirts, screens to shield the engine. These attenuating devices may be acquired at the time of leasing, rental, or purchase of equipment from the rental agency and/or manufacturer. All materials and equipment shall be stored on-site and within the confines of the construction barricades.

Stationary and Portable Equipment
Stationary and portable construction equipment will be located at positions where the noise impact to nearby noise/vibration-sensitive receptors (NVSR) is minimal. At times

where the equipment cannot be positioned at a minimal noise impacting location, noise mitigation devices may need to be implemented (e.g., noise barriers and/or noise blankets as described above).

Construction Equipment Inactivity
Construction equipment shall not remain idling and inactive for relatively long periods during construction hours. All such equipment shall be turned off until use is required.

Public Announcement Systems During Construction
The use of amplified public announcement systems, speakers, and similar equipment, except for a bull horn during emergency circumstances, shall not be utilized at the project.

Radios and Alarms
Radios, music playback equipment, musical instruments, or automobile or truck alarms shall not be utilized such that they are audible beyond the boundaries of the construction zone.

Vehicle Routes
Select truck routes for material delivery and spoils disposal so that noise from heavy-duty trucks will have a minimal impact on noise sensitive receptors.

Vehicle Horns
Except as otherwise required by law, all vehicle horns shall remain silent, except in the case of an emergency.

Noise Disturbance Coordinator
Designate a “noise disturbance coordinator” who shall be responsible for responding to any complaints about construction noise. The disturbance coordinator shall determine the cause of noise complaint and institute responsible measures warranted to correct the problem. A telephone number for the disturbance coordinator shall be conspicuously posted at the construction site.

Documentation: The Permittee shall submit the Construction Noise Monitoring Plan for review and approval to the Planning Division. Temporary Noise Barriers will need to be designed by a Professional Engineer licensed in the state of California, the design and detailed engineer drawings/calculations of the barrier will need to be reviewed and approved by the Planning Division. A separate zoning clearance and building permit may be required for temporary noise barriers if these structures are required to be installed.

Timing: Prior to issuance of Zoning Clearance for grading, the Permittee shall provide a Construction Noise Monitoring Plan for review and approval.

Monitoring and Reporting: The Planning Division maintains all acoustical reports, and a written description of any corrective measures, provided by the Permittee in the project file. The Planning Division has the authority to conduct site inspections to ensure

ongoing compliance with this condition, consistent with the requirements of § 8183-5 of the Ventura County Coastal Zoning Ordinance.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
22. Daytime Glare								
Will the proposed project:								
a) Create a new source of disability glare or discomfort glare for motorists travelling along any road of the County Regional Road Network?	X				X			
b) Be consistent with the applicable General Plan Goals and Policies for Item 22 of the Initial Study Assessment Guidelines?	X				X			

Impact Discussion:

22a. The Ventura County Initial Study Assessment Guidelines describes daytime glare as intense light that is blinding or discomforting to humans. Conditions that create daytime glare are typically caused by the reflection from sunlight from highly reflective surfaces at or above eye level. Daytime glare is caused by the reflective surfaces or buildings, structures, or facilities constructed with materials such as metal and glass. The project site is located north of SR-1 and west of Yerba Buena Road. Structures in lower camp will be screened from public view by trees and vegetation. West of Yerba Buena Road, Lower and Middle Camp are located at a lower elevation. Some of the structures will be visible from Yerba Buena Road, as discussed in Section 6 of this Initial Study, the project will be conditioned to require that the permittee utilize non-reflective materials, natural building materials and earth tone colors. Additionally, as discussed in Section 4 of this Initial Study, the project is subject to Mitigation Measure BIO-19: Wildlife Habitat Outdoor Lighting/Glare Condition. Therefore, the proposed project will not have significant project-specific impact due to the creation of daytime glare and will not make a cumulatively considerable contribution to a significant cumulative impact associated with glare.

22b. The proposed project is consistent with the Ventura County General Plan Goals and Policies for Item 22 of the Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): None

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
23. Public Health (EHD)								
Will the proposed project:								
a) Result in impacts to public health from environmental factors as set forth in Section 23 of the Initial Study Assessment Guidelines?		X				X		
b) Be consistent with the applicable General Plan Goals and Policies for Item 23 of the Initial Study Assessment Guidelines?		X				X		

Impact Discussion:

23a. Lower and Middle Camps will continue to utilize the existing sewer collection/conveyance system and the existing advanced Onsite Wastewater Treatment System (OWTS) for treatment and disposal, wastewater service for Upper Camp will continue to occur via private onsite wastewater systems composed of septic tanks and associated leach fields. The proposed project has the potential to impact public health due to the use of onsite wastewater treatment facility (conventional OWTS and a package treatment plant). Tertiary treated wastewater from the Middle and Lower Camps is discharged to 27 seepage pits in 2 seepage pit clusters. Each seepage pit is 6 feet in diameter with a total approximate depth of 30 feet. Treated wastewater from Gindling Hilltop Camp is discharged into six onsite septic systems and their associated leach fields. This subsurface wastewater disposal has the potential to contaminate groundwater if the effluent does not meet applicable standards. All wastewater discharges on the entire site are regulated by the Los Angeles Regional Water Quality Control Board (LARWQCB) under Order No. R4-2013-0079. Potential impacts can be reduced to less than significant with adherence to the waste discharge requirements and groundwater monitoring schedule established by the LARWQCB.

The proposed project includes the rebuilding and continued operation of a Ventura County Environmental Health Division (EHD) permitted organized camp with food facilities and swimming pools. The operator must submit plans to EHD for review and approval prior to beginning any construction of any of the new buildings. Compliance with all applicable state and local requirements related to the design, construction, and operation of an organized camp will reduce the public health impacts to less than significant.

The proposed project includes the construction of one new EHD-permitted pool facility (Lower Camp) and the continued operation and potential minor remodel of another EHD-permitted pool facility (Gindling Hilltop). Operators must submit plans to EHD and obtain

plan approval prior to beginning any construction or remodel of any pool facility and their related ancillary facilities. Compliance with all applicable state and local requirements related to the design, construction, and operation of a pool facility will reduce the public health impacts to less than significant.

The proposed project includes the reconstruction of new food facilities which are subject to permitting by the Ventura County Environmental Health Division (EHD) Community Services Section. Operators must submit plans to EHD and obtain plan approval prior to beginning any construction. Compliance with all applicable state and local requirements related to the design, construction, and operation of a food facility will reduce the public health impacts to less than significant.

The proposed project includes food service operations during private functions (parties, weddings, etc.). All food providers, including restaurants, food trucks, caterers, and concession stands, must comply with all applicable state and local requirements to reduce impacts to less than significant.

The proposed project may have impacts to public health due to onsite storage and/or handling of hazardous materials. Compliance with applicable state and local regulations will reduce potential project-specific and cumulative impacts to a level considered less than significant.

23b. The proposed project will be consistent with the General Plan for Item 23 of the Initial Study Assessment Guidelines, provided the OWTS is properly installed and maintained so as not to contaminate groundwater or create a public nuisance, provided the recreational facilities and the organized camp complies with all applicable State and local requirements, provided hazardous materials and medical waste are handled properly, and provided all food facilities/kitchens are constructed and operated according to all applicable laws and regulations related to commercial food facilities.

The proposed project is consistent with the applicable Ventura County General Plan Goals and Policies for Item 23 of the Ventura County Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): None

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
24. Greenhouse Gases (VCAPCD)								
Will the proposed project:								

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
a) Result in environmental impacts from greenhouse gas emissions, either project specifically or cumulatively, as set forth in CEQA Guidelines §§ 15064(h)(3), 15064.4, 15130(b)(1)(B) and -(d), and 15183.5?		X				X		

Impact Discussion:

24a. The project will have less than significant impact due to the construction operations that may generate fugitive dust. The amount of GHG emissions resulting from construction will be negligible compared to neighboring air district's recommended numerical thresholds of significance (3,000 MT CO2e/Yr for commercial/residential). Although construction emissions are temporary and short-term in nature, APCD will recommend updating the existing condition in permit LU10-0069 (Condition No. 51) to reflect project and lengthof construction and grading activities.

Mitigation/Residual Impact(s): None

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
25. Community Character (Plng.)								
Will the proposed project:								
a) Either individually or cumulatively when combined with recently approved, current, and reasonably foreseeable probable future projects, introduce physical development that is incompatible with existing land uses, architectural form or style, site design/layout, or density/parcel sizes within the community in which the project site is located?		X				X		
b) Be consistent with the applicable General Plan Goals and Policies for Item 25 of the Initial Study Assessment Guidelines?	X				X			

Impact Discussion:

25a. and 25b. The project site is located in the Santa Monica Mountains, on the south coast of Ventura County. The project site is surrounded by open space, with a limited number of parcels that include residential development. Development to the east of Lower Camp across Yerba Buena Road, includes “Neptune’s Net” restaurant. Additionally, east of the camp, residential development south of Ellice Street is approximately 325 ft east of lower camp and development north of Ellice Street is approximately 179 ft east of the Giltch Fitch Field (lower camp). Immediately southwest of lower camp across SR1 residential development adjacent to the Pacific Ocean includes single family homes that range from one to three stories. The camp structures will be rebuilt in similar location as before the Woolsey Fire and as discussed in Section 6(above), development in Lower and Middle camp was located along Little Sycamore creek and most of the structures were one-story, but several structures exceeded one story. The structures in Lower and Middle camp will be sited in the same or similar location as before the Woolsey Fire. Yerba Buena Road runs along the eastern boundary of Lower and Middle camp at a higher elevation. Yerba Buena Road renderings (Attachment B-5) provide a visual simulation of four public viewing locations from along Yerba Buena Road. Due to the topography, change of elevation and vegetation, not all the development will be visible from Yerba Buena Road. The project will be conditioned to require that the structures be constructed of materials and colors that complement the natural resources in the area.

The proposed project is consistent with the applicable Ventura County General Plan Goals and Policies for Item 25 of the Ventura County Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): None

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
26. Housing (Plng.)								
Will the proposed project:								

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
a) Eliminate three or more dwelling units that are affordable to: • moderate-income households that are located within the Coastal Zone; and/or, • lower-income households?	X				X			
b) Involve construction which has an impact on the demand for additional housing due to potential housing demand created by construction workers?	X				X			
c) Result in 30 or more new full-time-equivalent lower-income employees?	X				X			
d) Be consistent with the applicable General Plan Goals and Policies for Item 26 of the Initial Study Assessment Guidelines?	X				X			

Impact Discussion:

26a. – 26d. The project site is located within the CRE-20 ac/M zone and the project does not involve the destruction of existing dwellings. As stated in the Initial Study Assessment Guidelines, any project that involves construction has an impact on the demand for additional housing due to potential housing demand created by construction workers. However, construction worker demand is a less than significant project-specific and cumulative impact because construction work is short-term and there is a sufficient pool of construction workers within Ventura County and the Los Angeles metropolitan regions. As discussed above, the camp will continue to employ 32 full-time employees as the camp operated before the fire.

The proposed project is consistent with the applicable Ventura County General Plan Goals and Policies for Item 26 of the Ventura County Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): None

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
27a(1). Transportation & Circulation - Roads and Highways - Level of Service (LOS) (PWA)								
Will the proposed project:								
a) Vehicle Miles Travel		X				X		

Impact Discussion:

27a(1)-a. The project, as proposed, will not generate any additional ADT on the local public roads and the Regional Road Network.

Therefore, adverse traffic impacts relating to Vehicle Miles Traveled on County roads will be less than significant.

Mitigation/Residual Impact(s): None

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
27a(2). Transportation & Circulation - Roads and Highways - Safety and Design of Public Roads (PWA)								
Will the proposed project:								
a) Have an Adverse, Significant Project-Specific or Cumulative Impact to the Safety and Design of Roads or Intersections within the Regional Road Network (RRN) or Local Road Network (LRN)?		X				X		

Impact Discussion:

27a(2)-a. The project, as proposed, does not have the potential to alter the level of safety of roadways and intersections near the project. Therefore, impacts related to safety/design of County roads will be less than significant.

Mitigation/Residual Impact(s): None

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
27a(3). Transportation & Circulation - Roads & Highways – Safety & Design of Private Access (VCFPD)								
a) If a private road or private access is proposed, will the design of the private road meet the adopted Private Road Guidelines and access standards of the VCFPD as listed in the Initial Study Assessment Guidelines?		X				X		
b) Will the project be consistent with the applicable General Plan Goals and Policies for Item 27a(3) of the Initial Study Assessment Guidelines?		X				X		

Impact Discussion:

27a(3)-a. and 27a(3)-b. Vehicular access to camp will be from Gate 1(1-E) via Yerba Buena Road. The main entry will be widened to approximately 30 feet and a bus/fire turn-around will be provided north of Glitch Field. This main access road will be widened to 20 feet up to Camp Fire Road except for small segments. One vehicular bridge (8V) and one Arizona crossing (10-A-V) will remain in place. Vehicle bridge (2-V) will be replaced with a 14-foot-wide bridge, and vehicle bridges (4-V and 6-V) will be replaced and widened to 20 feet.

Gate 3 (3-E) will serve as secondary VCFD access, the entry will be widened to 20 feet and will be reduced to 12 feet for the portion of road adjacent to Structure 14.N. This secondary access will remain “as is” past Structure 14.N up to the main access road. The existing road west of middle camp and below the slope will be improved and widened, the road will commence south of Structure 20.N and connect to Camp Fire Road west of structure 41.N. A firetruck turnaround will be provided at middle camp north of Structure 24N. and firetruck hammerhead turnaround will be provided north of west of Structure 41.N.

The proposed project is consistent with the applicable Ventura County General Plan Goals and Policies for Item 27a(3) of the Ventura County Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): None

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
27a(4). Transportation & Circulation - Roads & Highways - Tactical Access (VCFPD)								
Will the proposed project:								
a) Involve a road or access, public or private, that complies with VCFPD adopted Private Road Guidelines?		X				X		
b) Be consistent with the applicable General Plan Goals and Policies for Item 27a(4) of the Initial Study Assessment Guidelines?		X				X		

Impact Discussion:

27a(4)-a. and 27a(4)-b Tactical access relates to the organized system of roads/access to and from a project utilized in the event of any emergency or disaster. As discussed in Item 27a(3) (above), tactical access to lower and middle camp will be provided mainly via Gate 1 and Gate 3. Camp Fire Road is north of Scouts Grove, this road connects middle and lower camp Yerba Buena Emergency Access Road, this emergency access road can be accessed via Gate 4 from Yerba Buena Road.

The proposed project is consistent with the applicable Ventura County General Plan Goals and Policies for Item 27a(4) of the Ventura County Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): None

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
27b. Transportation & Circulation - Pedestrian/Bicycle Facilities (PWA/Plng.)								
Will the proposed project:								

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
1) Will the Project have an Adverse, Significant Project-Specific or Cumulative Impact to Pedestrian and Bicycle Facilities within the Regional Road Network (RRN) or Local Road Network (LRN)?		X				X		
2) Generate or attract pedestrian/bicycle traffic volumes meeting requirements for protected highway crossings or pedestrian and bicycle facilities?		X				X		
3) Be consistent with the applicable General Plan Goals and Policies for Item 27b of the Initial Study Assessment Guidelines?		X				X		

Impact Discussion:

27b-1. – 27b-3. The restoration and continuation of pre-existing camp uses will not generate significant pedestrian or bicycle traffic. There are no schools, commercial centers, or transit stops in the immediate vicinity of the camp. Yerba Buena Road is located east of the camp, and it does not include pedestrian or bicycle facilities. SR1 is south of the camp and is used as a biking route but due to the private use of the camp no bicycle traffic would be generated by the camp. The proposed project is consistent with the applicable Ventura County General Plan Goals and Policies for Item 27b. of the Ventura County Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): None

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
27c. Transportation & Circulation - Bus Transit								
Will the proposed project:								

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
1) Substantially interfere with existing bus transit facilities or routes, or create a substantial increase in demand for additional or new bus transit facilities/services?	X				X			
2) Be consistent with the applicable General Plan Goals and Policies for Item 27c of the Initial Study Assessment Guidelines?	X				X			

Impact Discussion:

27c-1. There are no bus transit facilities near the camp. Due to the camp location, the continued camp use and special events will not interfere with bus transit facilities or routes or create a substantial demand for bus transit facilities and services. The proposed project is consistent with the applicable Ventura County General Plan Goals and Policies for Item 27c. of the Ventura County Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): None

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
27d. Transportation & Circulation - Railroads								
Will the proposed project:								
1) Individually or cumulatively, substantially interfere with an existing railroad's facilities or operations?	X				X			
2) Be consistent with the applicable General Plan Goals and Policies for Item 27d of the Initial Study Assessment Guidelines?	X				X			

Impact Discussion:

27d-1. The proposed project site is located 10 miles from the nearest railroad and would not interfere with an existing railroad's facilities or operations. Therefore, the proposed

project will not have a project-specific adverse impact, and will not make a cumulatively considerable contribution to a significant cumulative impact, related to existing railroad facilities or operations.

27d-2. The proposed project is consistent with the applicable Ventura County General Plan Goals and Policies for Item 27d of the Ventura County Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): None

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
27e. Transportation & Circulation – Airports (Airports)								
Will the proposed project:								
1) Have the potential to generate complaints and concerns regarding interference with airports?	X				X			
2) Be located within the sphere of influence of either County operated airport?	X				X			
3) Be consistent with the applicable General Plan Goals and Policies for Item 27e of the Initial Study Assessment Guidelines?	X				X			

Impact Discussion:

27e-1. and 27e-2. The proposed project is located approximately 11 miles southeast from the Camarillo Airport and approximately 8 miles east of the Naval Air Station Point Mugu. The project site is not located with the sphere of influence of any airport.

27e-3. The proposed project is consistent with the applicable Ventura County General Plan Goals and Policies for Item 27e of the Ventura County Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): None

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
27f. Transportation & Circulation - Harbor Facilities (Harbors)								
Will the proposed project:								
1) Involve construction or an operation that will increase the demand for commercial boat traffic and/or adjacent commercial boat facilities?	X				X			
2) Be consistent with the applicable General Plan Goals and Policies for Item 27f of the Initial Study Assessment Guidelines?	X				X			

Impact Discussion:

27f-1. The proposed project is located approximately 15 miles from the Channel Islands Harbor, the project will not increase commercial boat activity Therefore, the proposed will not have a project-specific adverse impact and will not make a cumulatively considerable contribution to a significant cumulative impact, related to existing harbor facilities or operations.

27f-2. The proposed project is consistent with the applicable Ventura County General Plan Goals and Policies for Item 27f of the Ventura County Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): None

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
27g. Transportation & Circulation - Pipelines								
Will the proposed project:								

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
1) Substantially interfere with, or compromise the integrity or affect the operation of, an existing pipeline?	X				X			
2) Be consistent with the applicable General Plan Goals and Policies for Item 27g of the Initial Study Assessment Guidelines?	X				X			

Impact Discussion:

27g-1. The Ventura County GIS (2022) indicates that there are no major or minor pipelines on the property, the nearest pipeline is located approximately 12 miles west of the project site. Therefore, the proposed project will not result in project-specific impacts and will not make a cumulatively considerable contribution to a significant cumulative impact related to pipelines.

27g-2. The proposed project is consistent with the applicable Ventura County General Plan Goals and Policies for Item 27g of the Ventura County Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): None

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
28a. Water Supply – Quality (EHD)								
Will the proposed project:								
1) Comply with applicable state and local requirements as set forth in Section 28a of the Initial Study Assessment Guidelines?	X				X			
2) Be consistent with the applicable General Plan Goals and Policies for Item 28a of the Initial Study Assessment Guidelines?	X				X			

Impact Discussion:

28a-1. Domestic water supply for the proposed project will be provided via an existing connection to Yerba Buena Water Company. Existing connection verified by Will Serve Letter dated April 18, 2022. The proposed project will not have any project-specific or cumulative impacts to the quality of domestic water supply.

28a-2. The proposed project is consistent with the General Plan for Item 28a of the Initial Study Assessment Guidelines regarding permanent domestic water supply.

Mitigation/Residual Impact(s): None

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
28b. Water Supply – Quantity (WPD)								
Will the proposed project:								
1) Have a permanent supply of water?		X				X		
2) Either individually or cumulatively when combined with recently approved, current, and reasonably foreseeable probable future projects, introduce physical development that will adversely affect the water supply - quantity of the hydrologic unit in which the project site is located?		X				X		
3) Be consistent with the applicable General Plan Goals and Policies for Item 28b of the Initial Study Assessment Guidelines?		X				X		

Impact Discussion:

28b-1. Stantec provided a technical memo titled Preliminary Water System Design, dated May 1, 2021. The memo provides an analysis for the distribution system for domestic, irrigation and fire water. The memo and its calculations assume all supply lines, distribution lines, valves, and appurtenances will be of new construction. Tanks used for domestic and fire water storage are in acceptable condition and will be inspected to ensure they meet current codes and standards. Yerba Buena Water Company (YBWC) will supply water for the camp as provided in the water will serve letter.

Appendix 2 of the Design memo is a technical memo from Stantec titled Preliminary Average and Maximum Day Demands and On-site Storage Calculations, dated May 1, 2021 (Attachment C-2). The memo provides an estimated domestic water and fire flow

demand, estimated irrigation demand and domestic and fire water storage requirements calculated per guidelines from the Ventura County Water Works Manual (VCWWM). Per the second submittal cover letter provided by Stantec Consulting Services, Inc. dated April 8, 2022, the Preliminary Water System Design Memo remains unchanged.

There are four domestic and one irrigation service meter connections from YBWC to the Camp. The applicant provided historical site water usage from data collected every two months by YBWC from 2009 to the present for each of the five service meters. Post Woolsey Fire data (2019-2020) is not included in the data, as it does not reflect full occupancy water usage. California Code of Regulations Title 22 requires the maximum monthly historical usage be used for water usage estimating purposes. The maximum estimated total domestic water usage based upon historical demand (maximum bi-monthly usage for Sept. & Oct. 2018) is 3,696,466 gallons or 68.064 acre-feet per year (AFY). The proposed project will not be increasing the population allowed at the camp per the existing CUP. The largest estimated 24-hour daily irrigation water cycle is 16,207 gallons or 18.154-AFY. Based upon the proposed onsite structures and enclosed building volumes, the technical memo calculated that the total required domestic, irrigation and fire water storage volumes for the site is 121,456 gallons. Based upon the technical memo presented in Appendix 2 of the Design memo and estimated calculations presented in Appendices C, D and E of the Design memo (calculated September 14, 2020, by Stantec), the proposed project will consume a total annual volume of 86.591-AFY.

A Water Availability Letter from YBWC, dated April 7, 2010, stated that the Site is located within its service area and is a customer of YBWC. YBWC provided a Will Serve Letter dated April 18, 2022, and stated that they will supply water to Camp Hess Kramer, Inc. for the subject property via the 5 existing service meters, limited to 10,621,000 gallons per calendar year (32.595-AFY).

The applicant's consultants met with the County on May 11, 2022 to discuss the water system volume calculations in the May 1, 2021 Storage memo (Attachment C-2) as it pertains to the annual quantity of water available from YBWC. Stantec prepared and provided a Total Annual Water Usage technical memo dated June 17, 2022 outlining the total estimated annual water usage for the proposed project and differentiated the annual water usage from the daily demands in the Storage memo. The estimated annual domestic, irrigation and produced recycled water were calculated to a total annual usage of 32.60-AFY, from which YBWC based their annual allocation for the site in the April 18, 2022 Will Serve Letter. The Total Annual Water Usage memo also proposed a water use monitoring program and recommended water use reduction measures to be implemented to reduce and limit future water use exceedances.

28b-2. The proposed project will not likely, either individually or cumulatively when combined with recently approved, current, and reasonably foreseeable probable future projects, introduce physical development that would adversely affect the water supply – quantity.

28b-3. The proposed project, as proposed, should be consistent with the applicable General Plan Goals and Policies for Item 28b of the Initial Study Assessment Guidelines and is considered less than significant.

Mitigation/Residual Impact(s): None

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
28c. Water Supply - Fire Flow Requirements (VCFPD)								
Will the proposed project:								
1) Meet the required fire flow?		X				X		
2) Be consistent with the applicable General Plan Goals and Policies for Item 28c of the Initial Study Assessment Guidelines?		X				X		

Impact Discussion:

28c-1. Water to the site will continue to be provided by Yerba Buena Water Company via an existing 100,000-gallon water storage tank (water purveyor tank) located adjacent to Yerba Buena Road on Camp Hess Kramer property at an elevation of 251 feet. A single 8-inch water main connected to the 100,000-gallon storage tank main can be utilized to serve both domestic and fire water to the buildings and fire hydrants at lower elevations in the camp. Based on the hydraulic analysis (Attachment C-2), utilizing the 100,000-gallon, an 8-inch fire water main can provide 1,000 gpm with a pressure residual above 25 psi at the 'fire scene' located below elevation 165 feet. The proposed buildings and fire hydrants in Middle Camp that are located above elevation 165 feet will not have adequate pressure above 25 psi with supply from the 100,000-gallon tank alone, therefore a dedicated fire pumping system is recommended for those buildings in Middle Camp. Based on Ventura County Fire Protection District and NFPA 1142, the dedicated fire water system serving the most demanding building in Middle Camp requires a fire flow of 750 gpm. Utilizing a UL/FM listed 25 hp fire pump and an 8-inchfire water main, flow and pressure requirements can be met for all buildings and hydrants located above elevation 165 in Middle Camp. The fire pump shall be designed per the requirements of NFPA 20 and NFPA 70 and will require a stand-by generator with a fuel tank (gas or diesel) for backup power during an outage.

The water purveyor tank will supply water to one 67,000-gallon tank (fire) and one 45,000-gallon tank (domestic) located at Upper Camp, this part of the water system will include

two 3,200-gallon intermediate tanks as part of the pumping system to supply water to Upper Camp.

A hydraulic analysis was performed using the fire flow requirements outlined in (Attachment C-2) while maintaining a 25-psi residual. Utilizing the existing onsite water storage tanks, a 6-inch fire water main can provide 750 gpm with a pressure residual above 25 psi to either 'fire scene 'located in Upper Camp. Double Check Detector Assemblies equipped with two check valves will be necessary for back flow prevention on the branches to the onsite fire hydrant(s) and fire sprinkler system mains.

28c-2. The project is consistent with the applicable Ventura County General Plan Goals and Policies for Item 28c of the Ventura County Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): None

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
29a. Waste Treatment & Disposal Facilities - Individual Sewage Disposal Systems (EHD)								
Will the proposed project:								
1) Comply with applicable state and local requirements as set forth in Section 29a of the Initial Study Assessment Guidelines?		X				X		
2) Be consistent with the applicable General Plan Goals and Policies for Item 29a of the Initial Study Assessment Guidelines?		X				X		

Impact Discussion:

29a-1. The proposed project will continue to utilize an existing Onsite Wastewater Treatment System (OWTS) with package treatment technology. The Los Angeles Regional Quality Control Board is responsible for OWTS that discharges from systems with package treatment technology, systems with a projected flow of 5,000 gallons per day or more, and if proposed OWTS will be for commercial food facility systems. The project will be conditioned to require the Permittee to complete and submit Form 200 to the RWQCB for new discharges or if there is a change in design or operation and change in quantity/type of discharge, to determine the integrity of the package treatment plant, and requirements for commercial food facility systems and waste discharge requirements (WDR). Conformance with the County Building Code Ordinance, state OWTS policy, and

EHD guidelines, as well as proper routine maintenance of septic systems, will reduce any project-specific and cumulative impacts to a level considered less than significant.

The proposed recycled water will need to meet Title 22 regulations, which requires approval from the LARWQCB. As a condition of that permit, the LARWQCB will require a California State Water Resources Control Board, Division of Drinking Water (DDW) Title 22 Engineering Report approval.

29a-2. The proposed project will be consistent with the General Plan for Item 29a of the Initial Study Assessment Guidelines provided the septic systems are properly installed and maintained so as not to contaminate groundwater or create a public nuisance.

Mitigation/Residual Impact(s): None

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
29b. Waste Treatment & Disposal Facilities - Sewage Collection/Treatment Facilities (EHD)								
Will the proposed project:								
1) Comply with applicable state and local requirements as set forth in Section 29b of the Initial Study Assessment Guidelines?	X				X			
2) Be consistent with the applicable General Plan Goals and Policies for Item 29b of the Initial Study Assessment Guidelines?	X				X			

Impact Discussion:

29b-1. The proposed project will utilize an onsite wastewater treatment system and will not require connection to a sewage collection facility. The project will not have any project-specific or cumulative impacts to a sewage collection facility.

29b-2. The proposed project will not require connection to a sewage collection facility and is consistent with the General Plan for Item 29b of the Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): None

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
29c. Waste Treatment & Disposal Facilities - Solid Waste Management (PWA)								
Will the proposed project:								
1) Have a direct or indirect adverse effect on a landfill such that the project impairs the landfill's disposal capacity in terms of reducing its useful life to less than 15 years?		X				X		
2) Be consistent with the applicable General Plan Goals and Policies for Item 29c of the Initial Study Assessment Guidelines?		X				X		

Impact Discussion:

29c-1. As required by California Public Resources Code (PRC) 41701, Ventura County's Countywide Siting Element (CSE), adopted in June 2001 and updated annually, confirms Ventura County has at least 15 years of disposal capacity available for waste generated by in-County projects. Because the County currently exceeds the minimum disposal capacity required by state PRC, the proposed project will have less than a significant project-specific impacts upon Ventura County's solid waste disposal capacity.

29c-2. In accordance with California's Green Building Standards Code (CALGreen) Sections 4.408 and 5.408, Ventura County Ordinance 4590 requires all discretionary permit applicants whose proposed project includes construction and/or demolition activities to reuse, salvage, recycle, or compost a minimum of 65% of the solid waste generated by their project. Public Works Agency-Integrated Waste Management Division's construction and demolition Waste diversion program (Form B Recycling Plan/Form C Report) ensures this 65% diversion goal is met prior to issuance of a final zoning clearance for use inauguration or occupancy, consistent with the Ventura County General Plan's Solid and Hazardous Waste Goals PSF 5.3 and 5.9. Therefore, the proposed project will have less than significant project-specific impacts and will not make a cumulatively considerable contribution to significant cumulative impacts related to the Ventura County General Plan's goals and policies for solid waste disposal capacity.

The proposed project is consistent with the applicable Ventura County General Plan Goals and Policies for Item 29c of the Ventura County Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): None

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
29d. Waste Treatment & Disposal Facilities - Solid Waste Facilities (EHD)								
Will the proposed project:								
1) Comply with applicable state and local requirements as set forth in Section 29d of the Initial Study Assessment Guidelines?	X				X			
2) Be consistent with the applicable General Plan Goals and Policies for Item 29d of the Initial Study Assessment Guidelines?	X				X			

Impact Discussion:

29d-1. The proposed project does not involve a solid waste operation or facility. The project will not have any project-specific or cumulative impacts related to a solid waste operation or facility.

29d-2. The proposed project does not involve a solid waste operation or facility and is consistent with the General Plan for Item 29d of the Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): None

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
30. Utilities								
Will the proposed project:								

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
a) Individually or cumulatively cause a disruption or re-routing of an existing utility facility?	X				X			
b) Individually or cumulatively increase demand on a utility that results in expansion of an existing utility facility which has the potential for secondary environmental impacts?	X				X			
c) Be consistent with the applicable General Plan Goals and Policies for Item 30 of the Initial Study Assessment Guidelines?	X				X			

Impact Discussion:

30a. and 30b. Electricity to the camp will continue to be provided by Southern California Edison and the project will not cause disruption or re-routing of an existing utility facility. Additionally, the proposed project will incorporate solar panels for electricity generation. There are no natural gas lines near the project site, the camp will continue to use liquid propane to meet gas requirements for the swimming pool and kitchen facilities. The camp will continue to use existing communication connections. Therefore, the proposed project will not have project-specific adverse impacts and will not make a cumulatively considerable contribution to a significant cumulatively impact, related to existing utility facilities.

30c. The proposed project will be consistent with the applicable Ventura County General Plan Goals and Policies for Item 30 of the Ventura County Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): None

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
31a. Flood Control Facilities/Watercourses - Watershed Protection District (WPD)								
Will the proposed project:								

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
1) Either directly or indirectly, impact flood control facilities and watercourses by obstructing, impairing, diverting, impeding, or altering the characteristics of the flow of water, resulting in exposing adjacent property and the community to increased risk for flood hazards?		X				X		
2) Be consistent with the applicable General Plan Goals and Policies for Item 31a of the Initial Study Assessment Guidelines?		X				X		

Impact Discussion:

31a-1. The project site drains to Little Sycamore Canyon which is a Ventura County Watershed Protection District jurisdictional redline channel. The project proponent is hereby informed that it is Watershed Protection's standard that a project cannot impair, divert, impede, or alter the characteristics of the flow of water running in any jurisdictional channel under the requirements of Ordinance WP-2. Please be aware that Little Sycamore Canyon has been identified as having limited flood carrying capacity and no increase in peak runoff will be allowed. The Project must provide adequate mitigation measures to comply with Watershed Protection's standard for peak attenuation, which is that the runoff after development shall not exceed the peak flow under existing conditions for any frequency of event. Analyses to meet these requirements should consider the 100-year, 50-year, 25-year, and 10-year design storm frequencies. Based on the work proposed within the bed and banks of the Little Sycamore Canyon including bridge repair and/or replacement activities, stormwater capture and potential direct connection to a jurisdictional channel and the restoration and bank stabilization efforts within Little Sycamore Canyon; the project will be conditioned to require the Permittee obtain a Watercourse or Encroachment Permit from Ventura County Watershed Protection District.

Mitigation Measure WPD-1: Cumulative Impacts on Jurisdictional Channels
Purpose: To comply with the Ventura County Watershed Protection District Ordinance WP-2, as amended.

Requirements: The proposed development shall incorporate mitigation measures to address cumulative impacts due to the proposed increase in imperviousness. The project shall reduce the developed condition peaks to the existing condition peaks for the 10-, 25-, 50-, and 100-year storms.

Documentation: The applicant shall submit a drainage study evaluating the existing and proposed conditions and presenting the design of a drainage system that will mitigate any increases in peak runoff to the above requirements. Acceptance of the drainage study will be completed as part of the County's standard plan-check process.

Timing: The drainage study shall be reviewed and accepted as meeting the applicable requirements prior to obtaining a building permit, grading permit, or prior to project start date if no grading or building permits are required.

Monitoring and Reporting: Prior to issuance of the first certificate of occupancy, County staff shall inspect the improvements to assure that construction was completed in accordance with the approved plans.

Condition of Approval: Watercourse or Encroachment Permit

Purpose: To comply with the Ventura County Watershed Protection District Ordinance WP-2, and mitigate potential impacts such as obstructing, impairing, diverting, impeding, or altering the characteristics of the flow of water to jurisdictional channels by designing and constructing appropriate surface drainage and flood control facilities to protect life and property from damage or destruction from flood and storm waters. Facilities requiring permits may include, but are not limited to, channel improvements and lateral storm drain connections. Permits are also required for any activities in, on, over, under, or across a jurisdictional red-line channel or within Watershed Protection right-of-way.

Documentation: An issued permit from Watershed Protection. A Watershed Protection permit application package shall be prepared and signed by the permittee or authorized agent and submitted to the Watershed Protection Permit Section. The Permit Section can be reached by calling 805-650-4060 or by emailing Sonnette.Aquino@ventura.org.

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

Monitoring and Reporting: Prior to permit closure, Watershed Protection staff will inspect the improvements to assure that construction was completed, in accordance with the approved plans and the permit requirements.

31a-2. The proposed project will be consistent with the applicable Ventura County General Plan Goals and Policies for Item 31a of the Ventura County Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): None

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
31b. Flood Control Facilities/Watercourses - Other Facilities (PWA)								
Will the proposed project:								
1) Result in the possibility of deposition of sediment and debris materials within existing channels and allied obstruction of flow?		X				X		
2) Impact the capacity of the channel and the potential for overflow during design storm conditions?		X				X		
3) Result in the potential for increased runoff and the effects on Areas of Special Flood Hazard and regulatory channels both on and off site?		X				X		
4) Involve an increase in flow to and from natural and man-made drainage channels and facilities?		X				X		
5) Be consistent with the applicable General Plan Goals and Policies for Item 31b of the Initial Study Assessment Guidelines?		X				X		

Impact Discussion:

31b-1. The proposed project directly discharges to Little Sycamore Creek similar to the pre-development and existing conditions. Submittal documents include Geomorphic Conditions Update and Basis of Design for Little Sycamore Creek, Camp Hess Kramer, prepared by ESA (Attachment D) and Creek Restoration Plans, prepared by ESA (Attachment E). Per the creek restoration grading plans and report, proposed improvements will result in creek stabilization of the bed and banks. The development will be completed according to current codes and standards that will generate no increase in sediment discharge or obstruction of flows in existing channels.

31b-2. The post-development storm water flow rates in Little Sycamore Creek will not exceed pre-development conditions. The proposed creek grading and restoration improvements will increase the channel capacity as well as reduce the potential for overflow during design storms.

31b-3. A portion of the project is located within a FEMA Special Flood Hazard Area (Zone A). The drainage patterns and flow rates will remain similar to existing conditions. The Drainage Report includes a comparison of the pre-project 100-year water surface elevation to the post-project 100-year water surface elevation. The comparison indicates that there will be no increase in the 100-year water surface elevation due to the proposed project either upstream or downstream of the project area.

31b-4. Per the hydrology and stormwater reports included in the project submittal, the site storm water runoff volumes will remain the same as the existing conditions, resulting in no increase.

31b-5. The project will not result in an increase to stormwater runoff and project drainage patterns to Little Sycamore Creek will remain unchanged. There will be no adverse effects to Areas of Special Flood Hazard, regulatory channels, and natural and man-made channels. The project will be completed according to current codes and standards.

Therefore, the project is consistent with the applicable General Plan Goals and Policies for Item 31b of the Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): None

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
32. Law Enforcement/Emergency Services (Sheriff)								
Will the proposed project:								
a) Have the potential to increase demand for law enforcement or emergency services?	X				X			
b) Be consistent with the applicable General Plan Goals and Policies for Item 32 of the Initial Study Assessment Guidelines?	X				X			

Impact Discussion:

32a. Pursuant to the Initial Study Assessment Guidelines, the proposed project is not included within a project category that could increase the demand for law enforcement or emergency services. The nearest Ventura County Sheriff's Station is the Camarillo Airport Sheriff's Station, which is located 16 miles northwest from the project site. The Ventura County Sherriff's Office did not identify any adverse impacts related to increased demand

for law enforcement or emergency services. Therefore, the proposed project will have a less-than-significant project-specific impact and will not make a cumulatively considerable contribution to a significant cumulative impact, with regard to law enforcement services.

32b. The project is consistent with the applicable Ventura County General Plan Goals and Policies for Item 32 of the Ventura County Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): None

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
33a. Fire Protection Services - Distance and Response (VCFPD)								
Will the proposed project:								
1) Be located in excess of five miles, measured from the apron of the fire station to the structure or pad of the proposed structure, from a full-time paid fire department?	X				X			
2) Require additional fire stations and personnel, given the estimated response time from the nearest full-time paid fire department to the project site?	X				X			
3) Be consistent with the applicable General Plan Goals and Policies for Item 33a of the Initial Study Assessment Guidelines?	X				X			

Impact Discussion:

33a-1. - 33a-3. Ventura County Fire Station No. 56 is located approximately 0.5 miles east from the project site, the project is considered to have no impact to fire protection services because the project site is under the 5-mile distance threshold for adequate response time. The project will not require the construction of a new fire station and Fire Station No. 56 fire is a fully staffed, no fire personnel will be required.

The project is consistent with the applicable Ventura County General Plan Goals and Policies for Item 33a of the Ventura County Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): None

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
33b. Fire Protection Services – Personnel, Equipment, and Facilities (VCFPD)								
Will the proposed project:								
1) Result in the need for additional personnel?	X				X			
2) Magnitude or the distance from existing facilities indicate that a new facility or additional equipment will be required?	X				X			
3) Be consistent with the applicable General Plan Goals and Policies for Item 33b of the Initial Study Assessment Guidelines?	X				X			

Impact Discussion:

33b-1. The proposed project will not result in the need for additional fire protection services personnel. Therefore, the proposed project will not have a project-specific impact and will not make a cumulatively considerable contribution to a significant cumulative impact, with regard to the need for fire personnel.

33b-2. As stated in this Initial Study (above), the nearest fire station to the project site is Ventura County Fire Station 56, which is located approximately 0.5 miles east of the project site on State Route 1 (Pacific Coast Highway). The distance from Fire Station 56 to the project site is adequate. Additionally, the Ventura County Fire Protection District reviewed the project and determined the water storage and distribution system meet the required fire flow in accordance with the Ventura County Fire Code. A new facility or additional equipment will not be required.

33b-3. The project is consistent with the applicable Ventura County General Plan Goals and Policies for Item 33b of the Ventura County Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): None

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
34a. Education - Schools								
Will the proposed project:								
1) Substantially interfere with the operations of an existing school facility?	X				X			
2) Be consistent with the applicable General Plan Goals and Policies for Item 34a of the Initial Study Assessment Guidelines?	X				X			

Impact Discussion:

34a-1. The restoration and continuation of camp use will not interfere with the operations of an existing school facility or cause a significant demand on schools. Any additional demand created by the proposed project would be mitigated by payment of school fees pursuant to § 65996 of the California Code (2014b). Therefore, the proposed project will have a less-than-significant project-specific impact related to schools and will not make a cumulatively considerable contribution to a significant cumulative impact related to schools.

34a-2. The project is consistent with the applicable Ventura County General Plan Goals and Policies for Item 34a of the Ventura County Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): None

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
34b. Education - Public Libraries (Lib. Agency)								
Will the proposed project:								

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
1) Substantially interfere with the operations of an existing public library facility?	X							
2) Put additional demands on a public library facility which is currently deemed overcrowded?	X							
3) Limit the ability of individuals to access public library facilities by private vehicle or alternative transportation modes?	X							
4) In combination with other approved projects in its vicinity, cause a public library facility to become overcrowded?					X			
5) Be consistent with the applicable General Plan Goals and Policies for Item 34b of the Initial Study Assessment Guidelines?	X				X			

Impact Discussion:

34b-1. -34b-4. The proposed project which is a non-residential camp will not have an impact on the operations an existing public library facility. The Planning Division staff analyzed Ventura County General Plan Public Facilities, Services, and Infrastructure Background Report, Figure 7-16 (Ventura County Libraries,) and determined that the project site is not located adjacent to or near any County library facilities. The nearest public library from the project site is the Ray D. Preuter Library located approximately 14 miles northwest of the project site. Therefore, the proposed development of the subject property does not have the potential to create project-specific impacts, which would interfere with the use of the library. Moreover, there would be no increase in the demand for library services that would result from the proposed project that would result in a significant drain on library resources, thereby warranting the need for the construction of new facilities that could result in adverse physical changes to the environment. Therefore, the proposed project will not have a significant project-specific impact and will not make a cumulatively considerable contribution to a significant cumulative impact related to library services.

34b-5. The project is consistent with the applicable Ventura County General Plan Goals and Policies for Item 34b of the Ventura County Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): None

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
35. Recreation Facilities (GSA)								
Will the proposed project:								
a) Cause an increase in the demand for recreation, parks, and/or trails and corridors?	X				X			
b) Cause a decrease in recreation, parks, and/or trails or corridors when measured against the following standards: • Local Parks/Facilities - 5 acres of developable land (less than 15% slope) per 1,000 population; • Regional Parks/Facilities - 5 acres of developable land per 1,000 population; or, • Regional Trails/Corridors - 2.5 miles per 1,000 population?	X				X			
c) Impede future development of Recreation Parks/Facilities and/or Regional Trails/Corridors?	X				X			
d) Be consistent with the applicable General Plan Goals and Policies for Item 35 of the Initial Study Assessment Guidelines?	X				X			

Impact Discussion:

35a.- 35d. The continued use of the camp will not increase the demand for recreation parks, and/or trails and corridors in the local area. The camp provides private access to recreation and trails within the camp. Public beaches to the south are separated from the camp by SR1, the camp use will not interfere with the use of the public beaches.

The proposed project is consistent with the applicable Ventura County General Plan Goals and Policies for Item 35 of the Ventura County Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): None

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
36. Tribal Cultural Resources								
Would the project:								
a) Cause a substantially 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 graphically defined in terms of size, scope of the landscape, sacred place, or object with cultural value to a California Native American tribe.			X				X	
b) Listed or eligible for listing in the California Register of Historical Resources, or in the local register of historical resources as defined in Public Resources Code Section 5020.1(k)? or	X				X			
c) A resource determined by the Lead Agency, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1.			X				X	

Impact Discussion:

36a, and 36c. On July 1, 2015, California Assembly Bill 52 of 2014 (AB 52) was enacted, expanding CEQA by defining a new resource category: tribal cultural resources.

Pursuant to PRC Section 21074, tribal cultural resources are either of the following:

a. Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:

   1. Included or determined to be eligible for inclusion in the California Register of Historical Resources or in a local register of historic resources.

2. Included in a local register of historical resources as defined in subdivision (k) of PRC Section 5020.1.
3. 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 PRC Section 5024.1. In applying the criteria set forth in subdivision (c) of PRC Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American Tribe.

b. A cultural landscape that meets the criteria of subdivision (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.

c. A historical resource described in PRC Section 21084.1, a unique archaeological resource as defined in subdivision (g) of PRC Section 21083.2, or a "nonunique archaeological resource" as defined in subdivision (h) of PRC Section 21083.2 may also be a tribal cultural resource if it conforms with the criteria of subdivision (a).

Pursuant to AB52 it is the obligation of the lead agency to carry out tribal consultation. Required AB52 consultation is carried out with tribes that have recognized by the Native American Heritage Commission and who have requested to have such consultation with the lead agency. The confidential consultation recognizes that tribes have expertise in determining if tribal cultural resources are present within the project area, as well as proposing and determining the adequacy of mitigation measures to avoid or substantially lessen potential significant impacts to tribal resources. In accordance with AB52, a formal notification of consultation opportunity was sent to representatives from the Barbareno/Ventureno Band of Indians and Fernandeno Tatavian Band of Indians on November 15, 2022. No response was received from the tribal representative and no additional consultation will occur.

See **Section 8A Cultural Resources - Archaeological** (above) for additional impact discussion and determination of less than significant impact with inclusion of mitigation measures.

36b. There are no structures at CHK that are listed or eligible for listing in the California Register of Historical Resources, or in the local register of historical resources. Therefore, the project will have no impact on these resources. See **Section 8B Cultural Resources – Historic** (above) for additional impact discussion and determination no project impact.

Mitigation/Residual Impact(s)

36a and 36c. See **Section 8A Cultural Resources - Archaeological** (above) for the Mitigation Measures for tribal cultural resources.

36b. None

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
37. Energy								
Would the project:								
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	X				X			
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	X				X			

Impact Discussion:

37a. The proposed project to rebuild Camp Hess Kramer will not result in unnecessary or wasteful energy consumption.

The project is designed to improve energy efficiency and improve water use through new, efficient fixtures and appliances. The proposed project site receives electrical service from Southern California Edison and the proposed project is designed to meet the applicable requirements for energy efficiency and Energy Code. Energy efficiency will increased with improved building insulation, improved pool heating equipment that includes multi-phased systems with heat exchangers. All new electrical, lighting, and low voltage systems for the Lower and Middle Camps shall be designed and installed in accordance with all applicable regulations, codes and standards, including the latest edition of the National Electrical Code, State of California Title 24.

There is no natural gas infrastructure near the project site; liquid propane will be continued to be used to meet gas requirements for swimming pool and kitchen facilities. The existing propane tanks will be replaced, and propane-powered generators will be used to supply backup power doing power outages.

37b. Because the project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency, the project would not have a project-specific or cumulative impact on energy use.

Mitigation/Residual Impact(s): None

Issue (Responsible Department) *	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
38. Wildfire								
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:								
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	X				X			
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?	X				X			
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?	X				X			
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?	X				X			

Impact Discussion:

38a.- d. This is a rebuilding project for the camp facilities that were destroyed during the 2018 Woolsey Fire. Minor increase in building size in the lower and middle camp area will not have any impact on the existing road and water supply infrastructure as stated in above sections for Fire Hazard, Roads and Fire Protection. All new landscaping and fuel

modification zones will comply with current State and Local Codes, which will provide reduced hazard from vegetation fires within the camp. The new entry / exit a from Yerba Buena will help with access and evacuation during an emergency at the camp as it is closer to PCH. This lower section of Yerba Buena has a buffer from the wildland area with the new development on Ellice Street and is also a wider road section. The project is also required to prepare a Fire Protection Plan that will also discuss emergency procedures, safety zones and evacuation, in addition to fuel modification.

Mitigation/Residual Impact(s): None

***Key to the agencies/departments that are responsible for the analysis of the items above:**

Airports - Department Of Airports	AG. - Agricultural Department	VCAPCD - Air Pollution Control District
EHD - Environmental Health Division	VCFPD - Fire Protection District	GSA - General Services Agency
Harbors - Harbor Department	Lib. Agency - Library Services Agency	Plng. - Planning Division
PWA - Public Works Agency	Sheriff - Sheriff's Department	WPD – Watershed Protection District

****Key to Impact Degree of Effect:**

N – No Impact
LS – Less than Significant Impact
PS-M – Potentially Significant but Mitigable Impact
PS – Potentially Significant Impact

Section C – Mandatory Findings of Significance

Based on the information contained within Section B:		
	Yes	**No**
1. Does the project have the potential to 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, 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?		X
2. Does the project have the potential to achieve short-term, to the disadvantage of long-term, environmental goals? (A short-term impact on the environment is one that occurs in a relatively brief, definitive period of time while long-term impacts will endure well into the future).		X
3. 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 effect of other current projects, and the effect of probable future projects. (Several projects may have relatively small individual impacts on two or more resources, but the total of those impacts on the environment is significant.)		X
4. Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?		X

Findings Discussion:

1. The Project could potentially degrade the environment by removing ESHA, constructing the Project within ESHA buffers, modifying streams and riparian habitat, operating a camp near sensitive habitats, use of amplified sound and outdoor night lighting near sensitive habitats, and incidentally introducing and facilitating the spread of invasive plants. Also, storm water runoff from the developed site, including impervious surfaces, could contain pollutants that would be discharged to streams. Mitigation measures have been identified to avoid, minimize, and/or reduce these potential impacts and ensure the Project would not degrade the environment.The Project could substantially reduce the available habitat at the site for monarch roosting, as live trees within known roosting sites would be removed and the Project proposes to remove numerous other eucalyptus and California sycamore trees. Also, locations where monarchs have been observed roosting would be encroached upon by the Project. Mitigation measures are included that would compensate for the potential loss and encroachment of the monarch roosting habitat at the site. Mitigation has also been identified to ensure the Project could be compatible with

active monarch butterfly roosting. The Project would not cause a fish or wildlife population to drop below self-sustaining levels or threaten to eliminate a plant or animal community. Although some plant communities and associated wildlife would be impacted, the impacts would be relatively small compared to the acreage of these plant communities and the size of animal populations that would remain at the Project site and in the surrounding area. Also, the Project would not reduce the number or restrict the range of a rare or endangered plant or animal. Rare and endangered plants have not been found during botanical surveys and are not expected to be impacted by the Project. No threatened or endangered animals are expected to inhabit the Project site, although the monarch butterfly overwinters at the site, and this species is currently a candidate for listing under the Federal Endangered Species Act. A relatively small number of individual special-status animals if present may potentially be affected, but the Project would not substantially reduce a population of these species. The Project as proposed is not consistent with County CZO ESHA policies, but mitigation measures have been identified that would reduce potentially significant impacts to a less than significant level.

2. As states in Section B, the proposed project does not have the potential to achieve short-term to the disadvantage of long-term environmental goals.

3. As stated in Section B, the proposed project does not have the potential to create a cumulatively considerable contribution to a significant cumulative impact.

4. No environmental effects have been identified which would cause substantial adverse effects, either or indirectly on human beings. As stated in Section B, the proposed project does not involve the use of hazardous material in a manner that pose any unusual risks since they must handled in compliance with all applicable regulation. Additionally, the proposed project does not involve operational noise that will interfere with surrounding uses, traffic hazards, adverse impacts to water bodies located on or around the project site.

Section D – Determination of Environmental Document

Based on this initial evaluation:

[ ]	I find the proposed project **could not** have a significant effect on the environment, and a **Negative Declaration** should be prepared.
[X]	I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because the mitigation measure(s) described in Section B of the Initial Study will be applied to the project. A **Mitigated Negative Declaration** should be prepared.
[ ]	I find the proposed project, individually and/or cumulatively, MAY have a significant effect on the environment and an **Environmental Impact Report** (EIR) is required.*
[ ]	I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An **Environmental Impact Report** is required, but it must analyze only the effects that remain to be addressed.*
[ ]	I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or Negative Declaration pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or Negative Declaration, including revisions or mitigation measures that are imposed upon the proposed project, **nothing further is required.**

Noe Torres

Noe Torres, Case Planner

November 22, 2024

Date

Attachments:
Attachment A - Maps
Attachment B - Project Plans

- Attachment B-1 S&S Architecture Set
    - Site Plan
    - Floor Plans
    - Elevation
    - S&S Site Aerials Perspectives
- Attachment B-2 Architecture Materials Palette
    - Materials Board-Color Inspiration
    - Material Board-Screen Options
- Attachment B-3 (General Sheets) Pre-Woolsey Fire and Post Project Structure Comparison
    - Project Building Tabulation Summary
    - Pre-fire building location site plan
    - New building location site plan
    - Site Accessibility Plan
    - Existing Trails/Roads
    - Amplified Music Locations/ Event Parking Site Plan
    - Stantec Exhibit Camping Platforms Rev 2 2022-06-09
    - Stantec Exhibit Tanks Rev 2 2022-06-27
- Attachment B-4 Tennis Court Perspectives
- Attachment B-5 Yerba Buena Perspectives
- Attachment B-6 Stantec Civil Sheets 2022-10-03
- Attachment B-7 Studio MLA Illustrative Set

Attachment C - Water Usage

- Attachment C-1 Stantec Preliminary Sewer and RW System Design memo 2021-05-01
- Attachment C-2 Stantec Preliminary Water System Design Memo 2021-05-01
- Attachment C-3 Yerba Buena Water Company Water Letter 2022-04-18
- Attachment C–4 Stantec Total Annual Water Usage technical memo dated 2022-06-17

Attachment D - Geomorphology

- ESA Geomorphic Conditions 2021-04

Attachment E - Creek Restoration

- ESA Creek Restoration Plans 2021-04-20

Attachment F- Initial Study Biological Assessment

- Attachment F- ISBA Attachment A List of California Natural Diversity Database(CNDDB)tracked species with recorded occurrences with at least a 10-mile radius of the project site
- Attachment F- ISBA Attachment B Arborist report (updated September 2023)
- Attachment F- ISBA Attachment C Pre-Woolsey Fire and Post Project Structures Comparison
- Attachment F- ISBA Attachment D Tree Disposition
    - Tree Disposition Tables
    - Tree Disposition Location Site Plan
    - Pavement Plans/Edging/Fence/Gate/Wall/Amenities Schedule and site plan
    - Cross Section/Elevations
    - Conceptual Materials
    - Irrigation Zones and Schedules
    - Planting Plans
- Attachment F-ISBA Attachment E Studio MLA Concept Landscape Plant Palette
- Attachment F-ISBA Attachment F 3 Studio MLA Tree Encroachment Exhibit
    - Tree encroachment summary
    - Tree Encroachment Plans
- Attachment F-ISBA Attachment G Fuel Modification Exhibits
- Attachment F-ISBA Attachment H ESA Restoration/Monarch Butterfly Memorandum 2023-09-12
- Attachment F-ISBA Attachment I Xerces Society Western Monarch Thanksgiving Count Data
- Attachment F-ISBA Attachment J Stantec Monarch Butterfly Surveys 2024-02-13

Attachment G - Maps of Past Present, and Reasonably Foreseeable Future Projects Used in the Cumulative Impact Analysis- Need Updated from 2-20-24
Attachment H - Geotechnical
Earth Systems Geotechnical Feasibility Report dated 2020-02-25

- Attachment – Earth Systems Geotech Feasibility of cabins below landslide 2020-07-08
- Attachment - Earth Systems Infiltration Testing Report 2021-03-05
- Attachment - Earth Systems Middle Camp Cross Section 2020-04
- Attachment - Earth Systems Rock Fall Protection 2020-12-08

Attachment I - Acoustical Study by Advanced Engineering Acoustics 2022-12-16
Attachment J - Noise and Vibration Study by Veneklasen Associates 2024-07-16
Attachment K - Hydrology and Hydraulics Study by Stantec 2022-03-07
Attachment L - Preliminary Drainage and Stormwater Treatment Report by Stantec 2021-05-01
Attachment M – Works Cited