MITIGATED NEGATIVE DECLARATION
AND
INITIAL STUDY

for the

UPPER SAN ANTONIO CREEK WATERSHED GIANT REED REMOVAL PROJECT

Prepared for the:

VENTURA COUNTY WATERSHED PROTECTION DISTRICT

State Clearinghouse Number 2009061067

Prepared by:

Aspen Environmental Group
30423 Canwood Street, Suite 215
Agoura Hills, California

September 2009

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Funding for this project has been provided in full or in part through an agreement with the State Water Resources Control Board. The contents of this document do not necessarily reflect the views and policies of the State Water Resources Control Board, nor does mention of trade names or commercial products constitute endorsement or recommendation for use.

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MITIGATED NEGATIVE DECLARATION

Ventura County Watershed Protection District
Upper San Antonio Creek Watershed Giant Reed Removal Project

1. INTRODUCTION

The Ventura County Watershed Protection District (VCWPD) proposes to remove giant reed (*Arundo donax*) where it occurs within the upper San Antonio Creek watershed. Giant reed is a non-native, highly invasive perennial plant that has become established in, and is spreading extensively throughout, riparian ecosystems in California. Giant reed consumes large quantities of water, displaces native vegetation and wildlife, disperses readily via channel flows that occur during heavy rains, and exacerbates flooding, erosion, and fire intensity. Once introduced, giant reed forms expansive rhizome systems that require human intervention to remove. Where castor bean (*Ricinus communis*) occurs in close proximity to those creek reaches targeted for giant reed removal, the VCWPD proposes to remove this non-native plant species as well. Castor bean grows aggressively along stream banks and can rapidly displace native plant species and habitat. At both regional and local scales, the objectives of the proposed project are to:

- Restore biological habitat, including special-status species habitat;
- Reduce flood hazards;
- Reduce fire risks;
- Improve water quality; and,
- Enhance water supply reliability and groundwater recharge.

The proposed project has been evaluated pursuant to the California Environmental Quality Act (CEQA) in order to assess its potential environmental impacts. Based upon the evaluation, which is presented in the Initial Study, this Final Mitigated Negative Declaration has been prepared.

In accordance with CEQA, a Draft Mitigated Negative Declaration and Initial Study were prepared for the proposed project in June 2009. The Draft Mitigated Negative Declaration and Initial Study were circulated for public and agency review and comment from June 22 through July 22, 2009. Additional written comments received following the close of the public and agency review period through August 18, 2009 were also accepted by the VCWPD. Following closure of the public and agency review comment period, responses to all comments received on the Draft Mitigated Negative Declaration and Initial Study were prepared, and modifications were made to these documents, as appropriate, to reflect these comments and responses.

This document represents the Final Mitigated Negative Declaration and Initial Study for the Ventura County Board of Supervisors to consider in its decision making process. It includes: a Mitigation Measure Monitoring Program – Implementation Plan (Appendix A of this Final Mitigated Negative Declaration); public and agency comments received on the Draft Mitigated Negative Declaration and Initial Study and the VCWPD's responses to these comments (Appendix B of this Final Mitigated Negative Declaration); and, modifications to the Draft Mitigated Negative Declaration and Initial Study, as warranted by the public and agency comments received. All text modifications to the Draft

Mitigated Negative Declaration and Initial Study are indicated in this document by vertical lines found in the right-hand margin.

2. PROJECT LOCATION

The upper San Antonio Creek watershed is located within the Ojai Valley of Ventura County, California. The Ojai Valley is approximately 12 miles north (inland) of the City of Ventura, and is accessed via State Highways 33 and 150. At a local scale, the proposed project area includes those portions of upper San Antonio, McNell, Thacher and Reeves Creeks that extend between the southwest boundary of Soule Park and Soule Park Golf Course and private in-holdings within Los Padres National Forest, which is located northeast and east of Soule Park and Soule Park Golf Course. Although some segments of these creeks traverse through the jurisdictional boundaries of the City of Ojai (Ojai), no creek reaches targeted for giant reed removal would occur within Ojai's city limits. Similarly, some segments of McNell and Thacher Creeks are located north of the Los Padres National Forest boundary; however, proposed removal activities along these creek reaches would occur on private lands that fall under the jurisdiction of Ventura County.

3. PROJECT DESCRIPTION

The proposed project would remove giant reed where it occurs along upper San Antonio, McNell, Thacher and Reeves Creeks. The distribution of giant reed within these creeks is patchy; overall, its percent cover relative to other vegetation is fairly low (less than about 20 percent). However, there are a few locations where its percent cover is as much as 76 percent. Estimates of the percent coverage, by acreage, for the sites targeted for giant reed removal are as follows:

- Less than 0.2 Percent – 139.56 Acres
- 0.3 to 5 Percent – 59.71 Acres
- 6 to 10 Percent – 4.31 Acres
- 11 to 19 Percent – 3.69 Acres
- 20 to 70 Percent – 4.49 Acres
- Greater Than 70 Percent – 0.35 Acres

As noted in the Introduction, the proposed project would also include the opportunistic removal of castor bean. The sections below provide a summary of proposed giant reed and castor bean removal activities.

Initial Herbicide Treatments. It is anticipated that a "cut and daub" treatment would be used to remove over 95 percent of the targeted giant reed. Using this treatment, all live giant reed material would be cut with hand held equipment such as chain saws, loppers and power brush cutters to a maximum of six inches above grade level. A glyphosate-based herbicide, such as Aquamaster®, would then be applied. Aquamaster® is approved and labeled for use near and in open water. The herbicide application would be completed within approximately two minutes of cutting and within six inches of grade; it would comprise painting the cambium layer of the freshly cut stalks with a cloth-covered wand or a sponge in a manner that would maximize the stalks' herbicide absorption. A colorant, such as Blaz-on®, would be added to the herbicide solution to identify treated plant material. It is estimated that approximately 900 gallons of herbicide would be used for cut and daub applications; this estimate is based on an approximate rate of 64 to 96 ounces of product per 400 square feet. The cut plant material would be taken off-site either by hand or with a small loader to a haul truck, which would be parked at the closest point of a road that provides access to the targeted removal site. The haul truck would then transport the cut plant material to a chipping site in Soule Park.

It is expected that less than five percent of the targeted giant reed would be controlled using a foliar spray treatment. This treatment would typically be applied to those stands of giant reed that have a cover of 20 percent or more. These giant reed stands would be foliar sprayed on-site. Once dead, the plant material would then be either left in place or taken to a local greenwaste or landscaping company for its use as mulch or other purposes. As with the cut and daub treatment, a glyphosate-based herbicide such as Aquamaster® would be used. Application rates for foliar spray vary by situation and product; however, it is anticipated that approximately 30 gallons (500 gallons, as diluted by six percent) per day would be needed for initial treatments, and that six gallons (200 gallons, as diluted by three percent) per day would be needed for re-treatments, as needed. Herbicide treatments would also involve the use of an approved surfactant such as Agri-Dex® and/or Activator 90®, both of which are approved for use near and in open water. As with the cut and daub treatment, a non-toxic herbicide colorant, such as Blaz-on®, would be applied to the herbicide mixture to distinguish treated versus non-treated plants.

The opportunistic removal of castor bean would include a foliar spray treatment with the types of products described in the above paragraph. Prior to the foliar spray treatment, the seed heads of individual plants would be removed with hand-held mechanical equipment such as clippers or loppers. Due to the invasiveness of castor bean, the seed heads would be bagged or otherwise wrapped and hauled to a landfill as a destruction load. Once the foliar spray is applied, the castor bean would not re-sprout or otherwise re-emerge; consequently, its off-site removal would not be necessary. However, if the VCWPD chooses to remove the dead castor bean material, it would be transported off-site at the same time that the dead giant reed plant material is removed to Soule Park for stock piling and chipping. In those instances where castor bean is removed with a cut and daub treatment, the same procedure and herbicide application as described above for giant reed would be undertaken.

Active work areas near public roads or intersections would be clearly posted with signs that would discourage plant gathering or other uses. Prior to any site-specific activities work crews would also survey the general area to ensure that no people or wildlife are present. The VCWPD would also notify all property owners of removal activities by mail at least two weeks prior to any work, and secure all necessary property access agreements.

A Pest Control Advisor (PCA) who holds either a Qualified Applicator License (QAL) or a Qualified Applicator Certificate (QAC) from the California Department of Pesticide Regulation would prepare a written recommendation for herbicide use for the VCWPD, and would submit it to the Ventura County Agricultural Commissioner for review and approval prior to the start of work. While the proposed herbicides are not restricted materials, all work conducted for the VCWPD must have a PCA written recommendation. All on-site herbicide applications would be supervised or completed by personnel that have a QAC or QAL. Additionally, the on-site supervisor would ensure that specific safety measures and manufacturer label specifications and requirements are followed, and that the VCWPD's protocols to avoid herbicide drift into adjacent areas are implemented. The VCWPD protocols and contractor specifications during foliar spray treatments would prohibit this application method within:

- 25 feet of surface water;
- 25 feet of any road;
- 200 feet of a residential home or outbuilding; or,
- 50 feet of an orchard or agricultural field.

In addition to the above, all of the applicable protocols specified in the *Plans and Specifications for the Matilija Dam Ecosystem Restoration Project Giant Reed Removal Project* would be implemented for the proposed project. To date, implementation of these protocols for the Matilija Dam Ecosystem Restoration Project Giant Reed Removal Project have successfully controlled herbicide applications; glyphosate has not been detected in surface water adjacent to targeted removal areas during post-application water quality monitoring.

Initial giant reed removal activities would take an estimated eight weeks, or 35 to 40 working days, to complete. It is anticipated that the initial herbicide applications, or treatments, would be completed by two crews of approximately five workers each. The total number of hours required for initial herbicide treatments at any given location would be dependent on the percent cover and extent of giant reed to be removed, as well as the type of treatment applied; however, on average, it is estimated that initial site-specific treatment activities would range between several hours to several working days. No heavy equipment would be required and no sub-surface disturbances would occur. It is anticipated that initial treatments would commence in the fall of 2009, following completion of the project's environmental review and regulatory permit acquisition processes. No herbicide applications would be undertaken within at least 24 hours in advance of any predicted rainfall events, or within 24 hours after a rainfall event.

Chipping. All cut giant reed would be transported to Soule Park for chipping, and castor bean plant material may be transported to the park for chipping as well. Cut plant material would be placed in haul trucks which would park at points along existing access roads that provide the closest vehicular access to the targeted removal sites. Primary access and transport roads would include Grand Avenue, Ojai Avenue, and Thacher, Reeves and Gorham Roads, although other roads may be used. Boardman Road and Soule Park Drive would provide access directly into and out of the park. It is estimated that approximately 1,000 cubic yards (cys) of unchipped plant material would require transport to Soule Park for chipping, and that on any given day approximately five to seven truck trips to the park would occur.

An area within Soule Park for both chipping and project-related equipment and materials staging would be necessary, and its location has been identified in consultation with the Ventura County Parks Department to ensure that inconveniences to park users and activities, as well as park maintenance activities, are minimized. Either one or two chippers would likely be required for the proposed project. The chippers would operate Mondays through Fridays between the hours of 12:00 p.m. and 6:00 p.m. to minimize disturbance to golfers using the Soule Park Golf Course. Operation of the chippers would not be necessary every day. The chippers would be operated only after enough plant material has been accumulated to warrant their efficient use. In total, it is estimated that the chippers would be operated approximately every seven to ten calendar days. All chipped material would be used by the Ventura County Parks Department for mulch, trail cover or other uses as identified by the Parks Department. The chipping and staging area may be fenced and posted with signs to restrict unauthorized access and ensure public safety.

Herbicide Re-Treatments. Following the initial herbicide treatment, a prescribed re-treatment would be undertaken in those areas where giant reed re-emerges. Depending on site-specific conditions, the re-treatment could occur up to four times annually. It is currently anticipated that re-treatments may

continue through 2012. The type of herbicide application used for the initial treatments would typically be used for re-treatments.

The workforce needed for each re-treatment pass is anticipated to require up to three crews of two to four workers each, and would take approximately ten working days to complete. As with the initial treatment, re-treatments would adhere to all VCWPD protocols and manufacturer specifications, be completed or supervised by a PCA, and follow the applicable protocols outlined in the *Plans and Specifications for the Matilija Dam Ecosystem Restoration Project Giant Reed Removal Project*. Public posting and property owner noticing by mail would be undertaken as well.

4. PROJECT PROPONENT

Ventura County Watershed Protection District
800 South Victoria Avenue
Ventura, California 93009-1610

Contact: Pam Lindsey, Watershed Ecologist (805) 654-2036

5. AVAILABILITY OF DOCUMENTS

Copies of the proposed project's Final Mitigated Negative Declaration and Initial Study, as well as the proposed project's cultural resources records search and Native American Heritage Commission sacred lands file search, and the *Plans and Specifications for the Matilija Dam Ecosystem Restoration Project Giant Reed Removal Project* are on file and available for review at the following location:

Ventura County Watershed Protection District
800 South Victoria Avenue, 1st Floor
Ventura, California 93009
(805) 654-2001

Copies of the Final Mitigated Negative Declaration and Initial Study are also available for review at the following locations:

Ojai Public Library
111 E. Ojai Ave.
Ojai, California 93023
(805) 646-1639

H.P. Wright Public Library
57 Day Road
Ventura, California 93003
(805) 642-0337

Avenue Public Library
606 North Ventura Avenue
Ventura, California 93001
(805) 643-6393

Meiners Oaks Public Library
114 North Padres Juan
Meiners Oaks, California 93023
(805) 646-4804

Santa Paula Public Library
119 North 8th Street
Santa Paula, California 93060
(805) 525-3615

The Final Mitigated Negative Declaration and Initial Study can also be accessed via the internet at:

http://vcwatershed.org

6. ENVIRONMENTAL DETERMINATION

This Final Mitigated Negative Declaration and Initial Study has been prepared to: (1) identify potential effects on the environment due to implementation of the proposed project; and, (2) evaluate the significance of these effects. Based upon the analysis contained in the Initial Study, the proposed project would have less than significant impacts or no impacts related to the following:

- General Plan Environmental Goals and Policies
- Land Use
- Water Resources
- Mineral Resources
- Agricultural Resources
- Visual Resources
- Energy Resources
- Coastal Beaches and Sand Dunes
- Seismic Hazards
- Geologic Hazards
- Hydraulic Hazards
- Aviation Hazards
- Fire Hazards
- Hazardous Materials and Waste
- Glare
- Public Health
- Water Supply
- Waste Treatment and Disposal
- Utilities
- Flood Control and Drainage
- Law Enforcement and Emergency Services
- Fire Protection
- Education

However, the environmental analysis presented in the Initial Study concludes that the proposed project could have potentially significant adverse impacts associated with seven issue areas unless mitigation measures are applied that can effectively reduce or avoid these impacts. These issue areas include:

- Air Quality
- Biological Resources
- Paleontological Resources
- Cultural Resources
- Noise and Vibration
- Transportation and Circulation
- Recreation

Measures have been formulated that, with full implementation, would effectively mitigate all of the potentially significant adverse environmental impacts associated with the proposed project to a level of less than significant. These measures are presented in the next section of this Final Mitigated Negative Declaration.

Based upon the impact analysis contained in Section B of the of the proposed project's Initial Study and the mandatory findings of significance contained therein (Initial Study Section C), this Final Mitigated Negative Declaration documents the VCWPD's finding that there are no significantly adverse unavoidable impacts associated with the proposed project, and that preparation of an Environmental Impact Report (EIR) is not warranted.

7. MITIGATION MEASURES

Implementation of the following mitigation measures would either avoid potentially significant impacts identified in the proposed project's Initial Study, or reduce them to a level of less than significant:

Air Quality

MM AQ-1 All equipment shall be turned off when not in use. Engine idling shall not exceed five (5) minutes unless required for proper operation.

MM AQ-2 Maintain equipment engines in good operating condition and in proper tune per manufacturers' specifications.

MM AQ-3 Use either new equipment that meets the recent California Air Resources Board's engine emission standards, or alternatively fueled construction equipment, such as compressed natural gas, liquefied natural gas, or electric, if feasible.

MM AQ-4 All project construction and site preparation operations shall be conducted in compliance with all applicable Ventura County Air Pollution Control District Rules and Regulations, with emphasis on Rule 50 (Opacity), Rule 51 (Nuisance) and Rule 55 (Fugitive Dust).

Biological Resources

MM B-1 A qualified biologist approved by the United States Fish and Wildlife Service and California Department of Fish and Game shall be present for all giant reed removal activities. The biologist shall be familiar with the wildlife species and other sensitive biological resources of the project area, be qualified to recognize potential effects to these resources, and ensure that all State and/or federal wetland/riparian and special-status species protection guidelines, as applicable, are followed. The biologist shall conduct sensitive floral and faunal clearance surveys within ten (10) days prior to any area(s) targeted for giant reed removal, including but not limited to surveys for the California red-legged frog, least Bell's vireo, southwestern willow flycatcher, southwestern pond turtle and southern steelhead. The biologist shall contact and consult with the California Department of Fish and Game if any sensitive biological resources are found within those areas targeted giant reed removal to develop and subsequently implement a Conservation Action Plan for any issues identified. During project implementation, the biologist shall additionally have the authority to stop or otherwise re-direct project-related activities in the event that any previously unidentified sensitive biological resources are identified.

MM B-2 Prior to project implementation, all project-related personnel shall be made familiar with the sensitive biological resources that may occur in the project area. All project-related personnel shall also be trained in, and required to comply with, the project's protocols, standards, specifications, recommendations and BMPs for herbicide applications, as well as the project's mitigation measures and permit conditions for environmental protection. All work crews shall be equipped with, and trained in the use of, spill cleanup kits for all equipment fueling, herbicide mixing and herbicide applications. All work crews additionally shall be provided with the California Department of Fish and Game's Office of Spill Prevention and Response (OSPR) contact phone number. In the event of a fuel or herbicide spill, the on-site construction crew manager shall call the OSPR immediately.

MM B-3 No project-related activities shall be conducted during periods of surface flow in the creek reaches targeted for giant reed and castor bean removal.

Paleontological Resources

MM P-1 If fossil remains are found during project implementation, the on-site supervisor shall contact an approved paleontological consultant immediately. The on-site supervisor shall additionally divert all project-related activities to other areas until the identified fossil materials have been evaluated by the paleontological consultant, who will determine if further mitigation measures are warranted.

Cultural Resources

MM C-1 In the event that archaeological resources are found during project implementation, the on-site supervisor shall contact an approved archaeological consultant immediately. The on-site supervisor shall additionally divert all project-related activities to other areas until the discovery has been evaluated by the approved archaeological consultant, who will determine if further mitigation measures are warranted.

Noise and Vibration

MM N-1 All equipment shall include noise reduction measures, as applicable. These measures shall include, but may not be limited to, properly operating and maintaining mufflers, correct placement of equipment engine covers, and ensuring that small loading equipment is equipped with rubber tires.

MM N-2 All machinery shall be equipped with the best available exhaust mufflers and "hush kits," as applicable.

MM N-3 Chain saws and power brush cutters shall be maintained with sharp, damped blades with random tooth spacing. Plant material shall be tightly clamped, as feasible, during cutting operations.

MM N-4 To the extent feasible, noise levels shall be kept relatively uniform. Excessive and impulse noises shall be avoided.

MM N-5 Noise producing signals, including horns, whistles, alarms, and bells shall be limited to safety warning purposes only.

MM N-6 As part of the project's advanced notification to all residences and property owners, a contact person name and phone number shall be provided. The contact person shall respond to all project-related questions or concerns, including noise and vibration, within 24 hours. If warranted by inquiries or complaints, on-site noise measurements shall be taken to determine if noise or vibration levels are substantially greater than expected levels. If plant removal activities are delayed by more than two weeks, an additional notice with a revised project implementation schedule shall be mailed to adjacent property owners.

MM N-7 Plant removal work crews shall be located a minimum of 400 feet apart from each other to limit their combined noise effect.

MM N-8 Project-related activities at Soule Park shall not exceed average hourly noise levels greater than 60 dBA. Chipping equipment shall be selected per manufacturer's specifications that ensure average hourly noise levels of 60 dBA or less, as measured from the nearest designated recreational area within the park, or a solid noise control barrier shall be erected around the chipping equipment. The noise control barrier shall be made of a solid, weather-protected, sound-absorptive material and erected according to applicable codes. Maintenance and repair of the noise control barrier shall include, but not be limited to, keeping its sides clean and free from graffiti, and promptly repairing gaps, holes, and other weaknesses. The noise control barrier shall be completely removed and the chipping area properly restored upon completion of all chipping-related activities.

MM N-9 To the extent feasible, haul trucks shall use major roadways and avoid residential side streets. Haul trucks shall not travel on streets within 250 feet of any school building during school hours, or within 250 feet of any hospitals and nursing homes at any time. In the event that project-related activities cannot meet these stipulations, a variance from Ventura County shall be obtained.

Transportation/Circulation

MM T-1 Consult with the County of Ventura Public Works Agency, Transportation Department, and the City of Ojai, Public Works Department, Transportation Division at least 30 days prior to project implementation. Consultations shall include identification of: all potential haul routes; proposed traffic safety measures such as warning signs, lights, flashing arrow boards, barricades and cones; lane closures that may be necessary; potential project-related parking, bicycle or pedestrian restrictions; and, any measures to alleviate potential access to and/or parking restrictions within Soule Park. Any traffic control measures that the Ventura County Transportation Department or City of Ojai Transportation Division recommend shall subsequently be implemented.

MM T-2 Coordinate with the County of Ventura and City of Ojai emergency service providers (police and fire departments and ambulance/paramedic providers) at least 30 days prior to project implementation to communicate information regarding the timing of, and activities that may involve, lane closures, driveway blockages, detours, or other roadway effects that could impede tactical access. Implement any recommendations provided by affected emergency response service providers to maintain essential emergency access routes.

Recreation

MM R-1 Notices at the entrance to Soule Park shall be posted that specify the days and hours during which use of the equestrian area will be restricted for safety purposes.

MM R-2 The chipping and staging area in Soule Park shall not be placed in a location that blocks access to the equestrian area. During the days and hours when the chipping equipment is not operated, project-related equipment and materials shall be stored in a manner that allows recreationists to safely access the equestrian area.

8. MITIGATION MEASURE MONITORING AND REPORTING

Section 15074(d) of the *State Guidelines for the Implementation of the California Environmental Quality Act* (*State CEQA Guidelines*) and Section 21081.6 of the Public Resources Code, require the lead agency of an environmental review document to adopt a Mitigation Measure Monitoring Program to ensure that all mitigation measures are complied with during implementation of a proposed project. Consistent with these requirements, Appendix A of this Final Mitigated Negative Declaration identifies the timing, monitoring methods, responsibility and compliance verification method for all mitigation measures identified in Section 7 of this Final Mitigated Negative Declaration.

Appendix A.
Mitigation Measure Monitoring Program-Implementation Plan

Appendix A. Mitigation Measure Monitoring Program – Implementation Plan

Mitigation Measure	Mitigation Measure Implementation Phase	Monitoring Action	Responsible Agency	Monitoring Documentation
Air Quality				
AQ-1: All equipment shall be turned off when not in use. Engine idling shall not exceed five (5) minutes unless required for proper operation.	During project implementation.	The project's *Plans and Specifications* shall require the contractor to adhere to the requirements of Mitigation Measure AQ-1. Project-related activities shall be periodically monitored by the VCWPD Restoration Coordinator, or his/her designee, to further ensure compliance.	VCWPD	The VCWPD Restoration Coordinator, or his/her appointed designee, shall document the equipment that was used in daily or weekly project implementation/inspection reports.
AQ-2: Maintain equipment engines in good operating condition and in proper tune per manufacturers' specifications.	During project implementation.	The project's *Plans and Specifications* shall require the contractor to adhere to the requirements of Mitigation Measure AQ-2. Project-related activities shall be periodically monitored by the VCWPD Restoration Coordinator, or his/her designee, to further ensure compliance.	VCWPD	The VCWPD Restoration Coordinator, or his/her appointed designee, shall document the condition of the equipment that was used in daily or weekly project implementation/inspection reports.
AQ-3: Use either new equipment that meets the recent California Air Resources Board's engine emission standards, or alternatively fueled construction equipment, such as compressed natural gas, liquefied natural gas, or electric, if feasible.	During project implementation.	The project's *Plans and Specifications* shall require the contractor to adhere to the requirements of Mitigation Measure AQ-3. Project-related activities shall be periodically monitored by the VCWPD Restoration Coordinator, or his/her designee, to further ensure compliance.	VCWPD	The VCWPD Restoration Coordinator, or his/her appointed designee, shall document the equipment that was used in daily or weekly project implementation/inspection reports.
AQ-4: All project construction and site preparation operations shall be conducted in compliance with all applicable Ventura County Air Pollution Control District Rules and Regulations, with emphasis on Rule 50 (Opacity), Rule 51 (Nuisance) and Rule 55 (Fugitive Dust).	During project implementation	The project's *Plans and Specifications* shall require the contractor to adhere to the requirements of Mitigation Measure AQ-4. Project-related activities shall be periodically monitored by the VCWPD Restoration Coordinator, or his/her designee, to further ensure compliance.	VCWPD	The VCWPD Restoration Coordinator, or his/her appointed designee, shall document activities and measures taken to minimize/control dust and comply with Ventura County Air Pollution Control District Rules 50, 51 and 55 in daily or weekly project implementation/inspection reports.

Mitigation Measure	Mitigation Measure Implementation Phase	Monitoring Action	Responsible Agency	Monitoring Documentation
Biological Resources				
B-1: A qualified biologist approved by the United States Fish and Wildlife Service and California Department of Fish and Game shall be present for all giant reed removal activities. The biologist shall be familiar with the wildlife species and other sensitive biological resources of the project area, be qualified to recognize potential effects to these resources, and ensure that all State and/or federal wetland/riparian and special status-species protection guidelines, as applicable, are followed. The biologist shall conduct sensitive floral and faunal clearance surveys within ten (10) days prior to any area(s) targeted for giant reed removal, including but not limited to surveys for the California red-legged frog, least Bell's vireo, southwestern willow flycatcher, southwestern pond turtle and southern The biologist shall contact and consult with the California Department of Fish and Game if any sensitive biological resources are found within those areas targeted giant reed removal to develop and subsequently implement a Conservation Action Plan for any issues identified. During project implementation, the biologist shall additionally have the authority to stop or otherwise re-direct project-related activities in the event that any previously unidentified sensitive biological resources are identified.	Prior to and during project implementation.	The VCWPD Restoration Coordinator, or his/her designee, shall either conduct or arrange for the completion of the project's pre-implementation biological surveys and contact the California Department of Fish and Game, as warranted, by the findings of these surveys. If necessary, the VCWPD Restoration Coordinator, or his/her designee, shall ensure implementation of any Conservation Action Plans, as agreed upon with the California Department of Fish and Game. The VCWPD Restoration Coordinator, or his/her designated biological monitor, shall inspect and direct, as needed, all project implementation phase activities to ensure the avoidance of all special-status plant and wildlife species.	VCWPD	The VCWPD Restoration Coordinator, or his/her appointed designee, shall document compliance with Mitigation Measure B-1 in the project's daily or weekly project implementation/inspection reports.

Mitigation Measure	Mitigation Measure Implementation Phase	Monitoring Action	Responsible Agency	Monitoring Documentation
B-2: Prior to project implementation, all project-related personnel shall be made familiar with the sensitive biological resources that may occur in the project area. All project-related personnel shall also be trained in, and required to comply with, the project's protocols, standards, specifications, recommendations and BMPs for herbicide applications, as well as the project's mitigation measures and permit conditions for environmental protection. All work crews shall be equipped with, and trained in the use of, spill cleanup kits for all equipment fueling, herbicide mixing and herbicide applications. All work crews additionally shall be provided with the California Department of Fish and Game's Office of Spill Prevention and Response (OSPR) contact phone number. In the event of a fuel or herbicide spill, the on-site construction crew manager shall call the OSPR immediately.	Prior to and during project implementation.	The VCWPD Restoration Coordinator, or his/her designee, shall ensure that all project-related personnel are appropriately trained in the project's mitigation measures, protocols, standards, specifications, recommendations and Best Management Practices. The project's *Plans and Specifications* shall additionally require the contractor to adhere to the all environmental protection measures, protocols, standards, specifications, recommendations and Best Management Practices. The contractor shall additionally ensure that all on-site work crews are equipped with, and trained in the use of, fuel and herbicide spill cleanup kits. The contractor shall also ensure that all on-site work crews have the California Department of Fish and Game's OSPR phone number, and that all on-site work crew supervisors are instructed to call the OSPR immediately in the event of an accidental fuel or herbicide spill. Project-related activities shall be periodically monitored by the VCWPD Restoration Coordinator, or his/her designee, to further ensure compliance.	VCWPD	The VCWPD Restoration Coordinator, or his/her appointed designee, shall document compliance with Mitigation Measure B-2 in the project's pre-implementation and implementation status report(s).
B-3: No project-related activities shall be conducted during periods of surface flow in the creek reaches targeted for giant reed and castor bean removal.	During project implementation.	The VCWPD Restoration Coordinator, or his/her designee, shall ensure that no project-related work occurs when surface water is present in the creek reaches targeted for giant reed and castor bean removal.	VCWPD	The VCWPD Restoration Coordinator, or his/her appointed designee, shall document compliance with Mitigation Measure B-3 in the project's daily or weekly project implementation/inspection reports.

Mitigation Measure	Mitigation Measure Implementation Phase	Monitoring Action	Responsible Agency	Monitoring Documentation
Paleontological Resources				
P-1: If fossil remains are found during project implementation, the on-site supervisor shall contact an approved paleontological consultant immediately. The on-site supervisor shall additionally divert all project-related activities to other areas until the identified fossil materials have been evaluated by the paleontological consultant, who will determine if further mitigation measures are warranted.	During project implementation.	The VCWPD Restoration Coordinator, or his/her designee, shall ensure that all project-related work is stopped or re-directed in the event that fossil remains are found, and that a qualified paleontologist is contacted immediately to evaluate the subject site and discovery. The VCWPD Restoration Coordinator, or his/her designee, shall additionally ensure that any recommendations of the paleontological consultant are followed.	VCWPD	The VCWPD Restoration Coordinator, or his/her appointed designee, shall document compliance with Mitigation Measure P-1, if and when implemented, in the project's daily or weekly project implementation/inspection reports.
Cultural Resources				
C-1: In the event that archaeological resources are found during project implementation, the on-site supervisor shall contact an approved archaeological consultant immediately. The on-site supervisor shall additionally divert all project-related activities to other areas until the discovery has been evaluated by the approved archaeological consultant, who will determine if further mitigation measures are warranted.	During project implementation.	The VCWPD Restoration Coordinator, or his/her designee, shall ensure that all project-related work is stopped or re-directed in the event that archaeological resources are found, and that a qualified archaeologist is contacted immediately to evaluate the subject site and discovery. The VCWPD Restoration Coordinator, or his/her designee, shall additionally ensure that any recommendations of the archaeological consultant are followed.	VCWPD	The VCWPD Restoration Coordinator, or his/her appointed designee, shall document compliance with Mitigation Measure C-1, if and when implemented, in the project's daily or weekly project implementation/inspection reports.
Noise and Vibration				
N-1: All equipment shall include noise reduction measures, as applicable. These measures shall include, but may not be limited to, properly operating and maintaining mufflers, correct placement of equipment engine covers, and ensuring that small loading equipment is equipped with rubber tires.	During project implementation.	The project's *Plans and Specifications* shall require the contractor to adhere to the requirements of Mitigation Measure N-1. Project-related activities shall be periodically monitored by the VCWPD Restoration Coordinator, or his/her designee, to further ensure compliance.	VCWPD	The VCWPD Restoration Coordinator, or his/her appointed designee, shall document the equipment that was used in daily or weekly project implementation/inspection reports.

Mitigation Measure	Mitigation Measure Implementation Phase	Monitoring Action	Responsible Agency	Monitoring Documentation
N-2: All machinery shall be equipped with the best available exhaust mufflers and "hush kits," as applicable.	During project implementation.	The project's *Plans and Specifications* shall require the contractor to adhere to the requirements of Mitigation Measure N-2. Project-related activities shall be periodically monitored by the VCWPD Restoration Coordinator, or his/her designee, to further ensure compliance.	VCWPD	The VCWPD Restoration Coordinator, or his/her appointed designee, shall document the equipment that was used in daily or weekly project implementation/inspection reports.
N-3: Chain saws and power brush cutters shall be maintained with sharp, damped blades with random tooth spacing. Plant material shall be tightly clamped, as feasible, during cutting operations.	During project implementation.	The project's *Plans and Specifications* shall require the contractor to adhere to the requirements of Mitigation Measure N-3. Project-related activities shall be periodically monitored by the VCWPD Restoration Coordinator, or his/her designee, to further ensure compliance.	VCWPD	The VCWPD Restoration Coordinator, or his/her appointed designee, shall document the equipment that was used in daily or weekly project implementation/inspection reports.
N-4: To the extent feasible, noise levels shall be kept relatively uniform. Excessive and impulse noises shall be avoided.	During project implementation.	The project's *Plans and Specifications* shall require the contractor to adhere to the requirements of Mitigation Measure N-4. Project-related activities shall be periodically monitored by the VCWPD Restoration Coordinator, or his/her designee, to further ensure compliance.	VCWPD	The VCWPD Restoration Coordinator, or his/her appointed designee, shall document excessive noise levels and all measures taken to minimize them in daily or weekly project implementation/inspection reports.
N-5: Noise producing signals, including horns, whistles, alarms, and bells shall be limited to safety warning purposes only.	During project implementation.	The project's *Plans and Specifications* shall require the contractor to adhere to the requirements of Mitigation Measure N-5. Project-related activities shall be periodically monitored by the VCWPD Restoration Coordinator, or his/her designee, to further ensure compliance.	VCWPD	The VCWPD Restoration Coordinator, or his/her appointed designee, shall document excessive and/or unnecessary noise levels and all measures taken to minimize them in daily or weekly project implementation/inspection reports.

Mitigation Measure	Mitigation Measure Implementation Phase	Monitoring Action	Responsible Agency	Monitoring Documentation
N-6: As part of the project's advanced notification to all residences and property owners, a contact person name and phone number shall be provided. The contact person shall respond to all project-related questions or concerns, including noise and vibration, within 24 hours. If warranted by inquiries or complaints, on-site noise measurements shall be taken to determine if noise or vibration levels are substantially greater than expected levels. If plant removal activities are delayed by more than two weeks, an additional notice with a revised project implementation schedule shall be mailed to adjacent property owners.	Prior to and during project implementation.	The VCWPD Restoration Coordinator, or his/her designee, shall ensure that notifications and re-notifications, if needed, are distributed to all potentially affected parties prior to the project implementation. The VCWPD Restoration Coordinator, or his/her designee, shall respond to any questions or complaints within a 24-hour period. The VCWPD Restoration Coordinator, or his/her designee, shall additionally modify project-related activities, as necessary, to address project-related complaints.	VCWPD	The VCWPD Restoration Coordinator, or his/her appointed designee, shall document the date(s) that all project-related notifications are transmitted in the project's pre-implementation status report(s) as well as any daily or weekly project implementation/inspection reports, as needed, for additional notifications. The VCWPD Restoration Coordinator, or his/her appointed designee, shall additionally document all project-related questions, concerns or complaints that are received in daily or weekly project implementation/inspection reports, as well as what measures were taken to address the received questions, concerns or complaints.
N-7: Plant removal work crews shall be located a minimum of 400 feet apart from each other to limit their combined noise effect.	During project implementation.	The project's *Plans and Specifications* shall require the contractor to adhere to the requirements of Mitigation Measure N-7. Project-related activities shall be periodically monitored by the VCWPD Restoration Coordinator, or his/her designee, to further ensure compliance.	VCWPD	The VCWPD Restoration Coordinator, or his/her appointed designee, shall document the location(s) of all project-related crews in daily or weekly project implementation/inspection reports.
N-8: Project-related activities at Soule Park shall not exceed average hourly noise levels greater than 60 dBA. Chipping equipment shall be selected per manufacturer's specifications that ensure average hourly noise levels of 60 dBA or less, as measured from the nearest designated recreational area within the park, or a solid noise control barrier shall be erected around the chipping equipment. The noise control barrier shall be made of a solid, weather-protected, sound-absorptive material and erected according to applicable codes.	During project implementation.	The project's *Plans and Specifications* shall require the contractor to adhere to the requirements of Mitigation Measure N-8. Project-related activities shall be periodically monitored by the VCWPD Restoration Coordinator, or his/her designee to further ensure compliance.	VCWPD	The VCWPD Restoration Coordinator, or his/her appointed designee, shall document the equipment types and numbers used at Soule Park in daily or weekly project implementation/inspection reports. In the event that combined project-related noise levels have the potential to exceed an average hourly noise level of 60 dBA, the VCWPD Restoration Coordinator, or his/her appointed designee, shall shut-

Mitigation Measure	Mitigation Measure Implementation Phase	Monitoring Action	Responsible Agency	Monitoring Documentation
Maintenance and repair of the noise control barrier shall include, but not be limited to, keeping its sides clean and free from graffiti, and promptly repairing gaps, holes, and other weaknesses. The noise control barrier shall be completely removed and the chipping area properly restored upon completion of all chipping-related activities.				down project-related activities at the park until either: (1) arrangements for noise measurements can be taken to verify that the 60 dBA threshold is not exceeded; or, (2) a noise control barrier is erected. Upon completion of all project-related chipping activities the VCWPD Restoration Coordinator, or his/her appointed designee, shall ensure full removal of the noise barrier and restoration of its site within the park. The VCWPD Restoration Coordinator, or his/her appointed designee, shall document compliance with Mitigation Measure N-8 in daily or weekly project implementation/inspection reports.
N-9: To the extent feasible, haul trucks shall use major roadways and avoid residential side streets. Haul trucks shall not travel on streets within 250 feet of any school building during school hours, or within 250 feet of any hospitals and nursing homes at any time. In the event that project-related activities cannot meet these stipulations, a variance from Ventura County shall be obtained.	Prior to and during project implementation.	Prior to construction, identify and obtain a Ventura County variance, if needed, for haul trucks that would pass within 250 feet of: - San Antonio Elementary School (650 Carne Road) (8:00 a.m. – 3:00 p.m.); - Thacher School (5025 Thacher Road) (8:00 a.m. – 3:00 p.m.); - Monica Ros School (783 McNell Road) (8:00 a.m. – 3:00 p.m.); - St. Joseph's Health and Retirement Center (2464 East Ojai Valley Avenue) (at any time). Prior to and during implementation Project-related activities shall be periodically monitored by the VCWPD Restoration Coordinator, or his/her designee, to further ensure compliance.	VCWPD	The VCWPD Restoration Coordinator, or his/her appointed designee, shall document receipt of any necessary variances and the number of average number trucks used and their overall haul routes in daily or weekly project implementation/inspection reports.

Mitigation Measure	Mitigation Measure Implementation Phase	Monitoring Action	Responsible Agency	Monitoring Documentation
Transportation/Circulation				
T-1: Consult with the County of Ventura Public Works Agency, Transportation Department, and the City of Ojai, Public Works Department, Transportation Division at least 30 days prior to project implementation. Consultations shall include identification of: all potential haul routes; proposed traffic safety measures such as warning signs, lights, flashing arrow boards, barricades and cones; lane closures that may be necessary; potential project-related parking, bicycle or pedestrian restrictions; and, any measures to alleviate potential access to and/or parking restrictions within Soule Park. Any traffic control measures that the Ventura County Transportation Department or City of Ojai Transportation Division recommend shall subsequently be implemented.	Prior to and during project implementation.	At least 30 days prior to project implementation the VCWPD Project Manager shall contact the County of Ventura Public Works Agency, Transportation Department, and the City of Ojai, Public Works Department, Transportation Division and request that they provide project-related traffic control measures, as appropriate. The project's *Plans and Specifications* shall require the contractor to adhere to all of the traffic control requirements stipulated by the County of Ventura Public Works Agency, Transportation Department, and the City of Ojai, Public Works Department, Transportation Division. These requirements shall additionally be communicated as part of the project's worker training process (see Mitigation Measure B-1). Project-related activities shall be periodically monitored by the VCWPD Restoration Coordinator, or his/her designee, to further ensure compliance.	VCWPD	Prior to project implementation the VCWPD Project Manager shall document compliance with Mitigation Measure T-1 in the project's pre-implementation status report(s). During project implementation the VCWPD Restoration Coordinator, or his/her appointed designee, shall document compliance with Mitigation Measure T-1 in daily or weekly project implementation/inspection reports.

Mitigation Measure	Mitigation Measure Implementation Phase	Monitoring Action	Responsible Agency	Monitoring Documentation
T-2: Coordinate with the County of Ventura and City of Ojai emergency service providers (police and fire departments and ambulance/paramedic providers) at least 30 days prior to project implementation to communicate information regarding the timing of, and activities that may involve, lane closures, driveway blockages, detours, or other roadway effects that could impede tactical access. Implement any recommendations provided by affected emergency response service providers to maintain essential emergency access routes.	Prior to and during project implementation.	At least 30 days prior to project implementation the VCWPD Project Manager shall contact County of Ventura and City of Ojai police department, fire department and ambulance/paramedic providers and request that they provide project-related traffic control measures and emergency access as appropriate. The project's *Plans and Specifications* shall require the contractor to adhere to all of the traffic control and emergency access requirements stipulated by the County of Ventura and City of Ojai police department, fire department and ambulance/paramedic providers. These requirements shall additionally be communicated as part of the project's worker training process (see Mitigation Measure B-1). Project-related activities shall be periodically monitored by the VCWPD Restoration Coordinator, or his/her designee, to further ensure compliance.	VCWPD	Prior to project implementation the VCWPD Project Manager shall document compliance with Mitigation Measure T-2 in the project's pre-implementation status report(s). During project implementation the VCWPD Restoration Coordinator, or his/her appointed designee, shall document compliance with Mitigation Measure T-2 in daily or weekly project implementation/inspection reports.
Recreation				
R-1: Notices at the entrance to Soule Park shall be posted that specify the days and hours during which use of the equestrian area will be restricted for safety purposes.	Prior to and during project implementation.	The VCWPD Restoration Coordinator, or his/her appointed designee, shall coordinate with the Ventura County Parks Maintenance Manager, or his/her designee, and ensure the posting of signs at appropriate locations to alert the public of planned project-related activities. Project-related signs shall be periodically checked by the VCWPD Restoration Coordinator, or his/her designee, and re-posted, as needed.	VCWPD	Prior to and during project implementation the VCWPD Restoration Coordinator, or his/her appointed designee, shall document compliance with Mitigation Measure R-1 in the project's pre-implementation status report(s) and daily or weekly project implementation/inspection reports, as applicable.

Mitigation Measure	Mitigation Measure Implementation Phase	Monitoring Action	Responsible Agency	Monitoring Documentation
R-2: The chipping and staging area in Soule Park shall not be placed in a location that blocks access to the equestrian area. During the days and hours when the chipping equipment is not operated, project-related equipment and materials shall be stored in a manner that allows recreationists to safely access the equestrian area.	Prior to and during project implementation.	The VCWPD Restoration Coordinator, or his/her appointed designee, shall coordinate with the Ventura County Parks Maintenance Manager, or his/her designee, to identify a chipping and staging area that minimizes blocked access and other inconveniences to the park's equestrian area. Project-related activities at the chipping and staging area shall be periodically monitored by the VCWPD Restoration Coordinator, or his/her designee, to ensure compliance with Mitigation Measure R-2.	VCWPD	Prior to and during project implementation the VCWPD Restoration Coordinator, or his/her appointed designee, shall document compliance with Mitigation Measure R-2 in the project's pre-implementation status report(s) and daily or weekly project implementation/inspection reports, as applicable.

Appendix B.
Comments and Responses to Comments

Appendix B. Responses to Comments Received on the Draft Mitigated Negative Declaration and Initial Study

The proposed project's Draft Mitigated Negative Declaration and supporting Initial Study was circulated for public and agency review from June 22 through July 22, 2009. During the review period, written comments could be submitted in the form of letter, facsimile (fax) or electronically (e-mail). The Ventura County Watershed Protection District's (VCWPD's) Project Manager was additionally available by phone for any verbal questions or comments. Although not formally on the agenda, verbal comments regarding the proposed project were received during Item 8 Public Comments at the Ventura County Board of Supervisors' meetings held on July 14 and 21, 2009.

Written comments have been received from 18 parties, including six from regulatory agencies and 12 from members of the public. Table B-1 provides a listing of each commenting party. The written comments received are presented in the first section of this appendix. Each letter and email received has been assigned a letter (e.g., "A," "B," "C," etc.) and the specific comments contained in each letter or email have subsequently been assigned a number (e.g., "1," "2," "3," etc.). The alphanumeric assignment of each comment (e.g., "A-1," A-2," B-1," "B-2," etc.) is indicated in the right-hand margin of each written correspondence received. Responses to these comments are contained in the second section of this appendix and they cross-reference each comment's alphanumeric assignment. Transcripts of the verbal comments taken at the above-referenced Board of Supervisors' meetings follow the written comments received on the Draft Mitigated Negative Declaration and supporting Initial Study. Responses to the verbal comments follow the responses to written comments, as indicated in Table B-2.

Several of the written comments provided by the public and verbally expressed at the July 14th and July 21st Board of Supervisors' meetings relate to common concerns. Specifically, they address issues associated with the use of herbicides and their potential toxic effects to humans and the environment, and alternatives to the use of herbicide treatments. To address these concerns, four project-wide responses (referred to as "Global Responses") have been prepared to provide a complete and comprehensive assessment of these comments rather than repeating the same information multiple times in response to each individual comment. As needed, more detailed responses are provided in the individual responses to comments. The global responses are found at the beginning of the responses to comments section of this appendix.

Table B-1. Written Comments on the Draft Mitigated Negative Declaration and Supporting Initial Study

Comment Letter or E-mail	Commenter
A	Governor's Office of Planning and Research, State Clearinghouse Division
B	California Department of Fish and Game
C	California Department of Transportation (CalTrans)
D	Ventura County General Services Agency, Parks Department
E	Ventura County Public Works Agency, Integrated Waste Management Division
F	Ventura County Air Pollution Control District
G	Meredith Clement, Kennedy/Jenks Consultants
H	Estelle Foster
I	Judith Elliott
J	Sharon Monet
K	Robin Bernhoft
L	Marleen Luckman

Comment Letter or E-mail	Commenter
M	Byron Rader
N	Lynda Rader
O	Susan Draffan
P	Noreen Murano and Anna Huber, Wildscape Restoration
Q	Patty Pagaling
R	Renee Roth

Table B-2. Verbal Comments on the Draft Mitigated Negative Declaration and Supporting Initial Study

Verbal Comment Set*	Board of Supervisors' Meetings
S	July 14, 2009
T	July 21, 2009

* Please refer to the transcripts for the July 14th and 21st Board of Supervisors' meetings for the names of specific commenters.

Comment Set A: Governor's Office of Planning and Research, State Clearinghouse Division

STATE OF CALIFORNIA

GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH

STATE CLEARINGHOUSE AND PLANNING UNIT

ARNOLD SCHWARZENEGGER
GOVERNOR

CYNTHIA BRYANT
DIRECTOR

July 21, 2009

Pam Lindsey
Ventura County Watershed Protection District
800 S. Victoria Avenue, 1st floor
Ventura, CA 93009-1610

Subject: Upper San Antonio Creek Watershed Giant Reed Removal Project
SCH#: 2009061067

Dear Pam Lindsey:

The State Clearinghouse submitted the above named Mitigated Negative Declaration to selected state agencies for review. The review period closed on July 16, 2009, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. **A-1**

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Terry Roberts

Terry Roberts
Director, State Clearinghouse

Comment Set B: California Department of Fish and Game

State of California – The Resources Agency ARNOLD SCHWARZENEGGER, Governor

DEPARTMENT OF FISH AND GAME
http://www.dfg.ca.gov
South Coast Region
4949 Viewridge Avenue
San Diego, CA 92123
(858) 467-4201

July 23, 2009

Ms. Pam Lindsey
Ventura County Watershed Protection District
800 South Victoria Avenue, 1st Floor
Ventura, CA 93009-1610
FAX: 805/654-3350

Subject: Draft Mitigated Negative Declaration for Upper San Antonio Creek Watershed Giant Reed Removal Project, Ventura County SCH # 2009061067

Dear Ms. Lindsey:

The Department of Fish and Game (Department) has reviewed the Draft Mitigated Negative Declaration (DMND) for the Upper San Antonio Creek Watershed Giant Reed (*Arundo donax*) Removal Project. The Ventura County Watershed Protection District (VCWPD) proposed project is located within the Ojai Valley of Ventura County and includes the segment of upper San Antonio Creek which is located within and north of Soule Park and Soule Park Golf Course, portions of McNell, Thacher, and Reeves Creeks. Some reaches within these creeks traverse through the jurisdictional boundaries of the city of Ojai; however, all proposed removal activities would occur in the unincorporated areas of Ventura County, or within Soule Park and Soule Park Golf Course (both owned by Ventura County). Giant reed removal would also occur along some segments of McNell and Thacher Creeks that are located north of the Los Padres National Forest boundary; these removal activities would occur within private in-holdings that also fall under the jurisdiction of Ventura County.

The proposed project objectives:

1. Restore biological habitat, including special-status species habitat
2. Reduce flood hazards
3. Reduce fire risks
4. Improve water quality
5. Enhance water supply reliability and groundwater recharge.

Construction is planned to begin in the fall 2009 and the initial treatment is estimated to take eight weeks. It is anticipated that the initial treatment would be completed by two crews of approximately five workers. Following the initial herbicide treatment, depending upon re-sprouting, re-treatment could occur up to four times per year through 2012.

We prepared the following statements and comments pursuant to our authority as Trustee Agency with jurisdiction over natural resources affected by the project under the California Environmental Quality Act (CEQA Section 15386) and Responsible Agency (Section 15381) over those aspects of the proposed project that come under the purview of the California Endangered Species Act (Fish and Game Code Section 2050 et seq.) and Fish and Game Code Section 1600 et seq. regarding impacts to streams and lakes.

Conserving California's Wildlife Since 1870

Comment Set A: California Department of Fish and Game, continued

Mr. P. Lindsey
July 23, 2009
Page 2 of 4

The California Wildlife Action Plan, a recent Department guidance document, identified the following stressors affecting wildlife and habitats within the project area: 1) growth and development; 2) water management conflicts and degradation of aquatic ecosystems; 3) invasive species; 4) altered fire regimes; and 5) recreational pressures. The Department looks forward to working with the County of Ventura to minimize impacts to fish and wildlife resources with a focus on these stressors. **B-1**

The Department appreciates the opportunity to comment on this DMND and acknowledges the high level of detail in preparing and analyzing the proposed project. The Department concurs with the need to treat and control giant reed. As stated on page B37 of the DMND, "The introduction of noxious and invasive weeds species in these areas is a special concern for native plant communities and is recognized by resource agencies and ecologists as a threat to native vegetation communities and wildlife. Noxious and invasive weeds, particularly giant reed, pose a threat to the natural processes of plant community succession, fire frequency, biological diversity and species composition. Noxious and invasive weeds can also affect the persistence of some populations of special status species by replacing the foraging base, altering habitat structure, or excluding a species by vegetative growth." The Department applauds the VCWPD for taking the initiative to apply for grant funds, prepare the environmental documents, and implement a large scale giant reed removal project. **B-2**

The Department concurs that the use of Aquamaster ®, while following the U.S. Environmental Protection Agency application specifications, including follow-up applications, is a very effective technique for controlling giant reed infestations. When following the label specification application rates and application techniques as described in the DMND, non-target species impacts can be kept to less than significant levels. **B-3**

The Department has the following specific recommendations with regard to the DMND:

On page 33 of the DMND the document states:

> "The supervisor would additionally ensure that specific safety measures and manufacturer specifications are followed, and that the VCWPD's protocols to avoid herbicide drift into adjacent areas and the product label requirements are implemented. The VCWPD protocols and contractor specifications during foliar spray treatments would prohibit this application method within:
> • 15 feet of surface water;
> • 25 feet of any road;
> • 200 feet of a residential home or outbuilding; or,
> • 50 feet of an orchard or agricultural field. "

The Department recommends that foliar spray treatments be prohibited within 50 feet of surface water and the cut and daub method be used in those areas to further minimize the potential for herbicide drift into the water. The Department recommends that spill cleanup kits be available to all crews during equipment fueling and herbicide mixing and that the Department's Office of Spill Prevention and Response (OSPR) contact number (24-hour CDFG-OSPR Dispatch Center- 888-334-2258) be given to all field crews. **B-4**

The Department acknowledges that this proposed treatment methodology has been previously successful at mitigating potential impacts to surface water as stated on page 33 of the DMND:

> "To date, implementation of these protocols for the Matilija Dam Ecosystem Restoration Project Giant Reed Removal Project have successfully controlled herbicide applications; glyphosate has not been detected in surface water

Comment Set A: California Department of Fish and Game, continued

Mr. P. Lindsey
July 23, 2009
Page 3 of 4

adjacent to targeted removal areas during post-application water quality monitoring. "

The Department concurs with the following mitigation measures on page 76 of the DMND with exception to the fourth bullet and recommends increasing the distance of foliar application to 50 feet instead of 15 feet from any standing or flowing water:

"The Pest Control Advisor would additionally ensure that: all safety measures and manufacturer specifications are followed; the VCWPD's protocols to avoid herbicide drift into adjacent areas implemented; and, the specifications and Best Management Practices (BMPs) provided in the Plans and Specifications for the Matilija Dam Ecosystem Restoration Project Giant Reed Removal Project are followed. These specifications and BMPs include, but are not limited to:

- Work shall not be conducted within the breeding, nesting, and fledging season for most migratory birds (March 1 to September 15), without prior surveys resulting in a negative finding.
- Herbicide shall not be used at least 24 hours in advance of a predicted rainfall event or within 24 hours after a rainfall event.
- Equipment refueling and herbicide mixing and storage shall occur in designated staging areas at least 100 feet from riparian and wetland habitats.
- Aquatic application of herbicide is strictly prohibited. The contractor shall not conduct foliar application within 15 feet of any standing or flowing surface waters, and shall not allow herbicide to contact surface waters or native vegetation extending over surface waters."

B-5

The Department concurs with the following mitigation measures found on page 78-79 of the DMND:

"To avoid potential adverse impacts the proposed project would implement the following requirements: (1) avoid all standing and flowing water; (2) prohibit herbicide applications prior to, during, or within 24 hours following a rain event; and, (3) remove vegetation with hand held equipment."

"MM B-1: A qualified biologist approved by the United States Fish and Wildlife Service and California Department of Fish and Game shall be present for all giant reed removal activities. The biologist shall be familiar with the wildlife species and other sensitive biological resources of the project area, be qualified to recognize potential effects to these resources, and ensure that all State and/or federal wetland/riparian and special status species protection guidelines, as applicable, are followed. The biologist shall be responsible for surveying targeted creek reaches and their surrounding areas prior to the start of any giant reed removal activities, and moving any identified wildlife out of harms way, to the extent practicable. The biologist shall additionally have the authority to stop or otherwise re-direct project-related activities in the event that sensitive biological resources are identified.

MM B-2: Prior to project implementation, all project-related personnel shall be made familiar with the sensitive biological resources that may occur in the project area. All project related personnel shall also be trained in, and required to comply with, the project's protocols, standards, specifications, recommendations and BMPs for herbicide applications, as well as the project's mitigation measures and permit conditions for environmental protection.

Comment Set A: California Department of Fish and Game, continued

Mr. P. Lindsey
July 23, 2009
Page 4 of 4

MM B-3: No project-related activities shall be conducted during periods of surface flow in San Antonio and Thacher Creeks."

In addition to the above proposed mitigation measures, the Department recommends the following:

1. The biological monitor(s) will conduct sensitive floral and fauna clearance surveys within 10 days prior to treatment of the area, including but not limited to California red-legged frog, least Bell's vireo, southwestern willow flycatcher, southwestern pond turtle, and southern steelhead. **B-6**
2. The biological monitor(s) will contact and consult with CDFG staff if any sensitive biological resources are found within the project area to develop and implement a conservation action plan for the specific issue.

The Department also recommends that long-term monitoring using remote sensing be conducted every 3-5 years past 2012 to evaluate the riparian habitat condition and locate any re-infestations of giant reed and incorporate treatments into the VCWPD maintenance program. **B-7**

The Department concurs with page A12 of the DMND that this proposed project would require a Section 1602 permit for its implementation. **B-8**

Thank you for the opportunity to comment on this DMND. The Department appreciates the County's efforts to control giant reed and therefore enhance native habitats. Please contact Mr. Dan Blankenship, Staff Environmental Scientist, at (661) 259-3750 if you should have any questions and for further coordination on the proposed project.

Sincerely,

Edmund J. Pert
Regional Manager
South Coast Region

cc: Department of Fish and Game
Ms. Helen Birss, Los Alamitos
Ms. Betty Courtney, Newhall
Mr. Dan Blankenship, Newhall
Mr. Martin Potter, Ojai
Mr. Natasha Lohmus, Santa Barbara

State Clearinghouse, Sacramento

Comment Set C: California Department of Transportation (CalTrans)

STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY ARNOLD SCHWARZENEGGER, Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 7
100 MAIN STREET, SUITE 100
LOS ANGELES, CA 90012-3606
PHONE (213) 897-0610
FAX (213) 897-0685
TTY (213) 897-4937

Flex your power!
Be energy efficient!

August 13, 2009

Ms. Pam Lindsey
Ventura County Watershed Protection District
800 S. Victoria Ave.
Ventura, CA 93009-1600

Dear Ms. Lindsey,

Subject: Biological Review of IGR/CEQA Document

After a review of the environmental document, 'Giant Reed Removal in Upper San Antonio Creek Watershed W. of Ventura River', produced by the County of Ventura Watershed Protection District, the following comments are included for your consideration:

- The project's overall goals are beneficial to the biological integrity of the watershed in question. They will also benefit Caltrans through a lessening of debris in the channel, which tends to lower capacity at road structures such as bridges and culverts. In this case, Route 150 bridges at San Antonio Creek and Thatcher will benefit from this project in this manner. **C-1**
- Any work within Caltrans Right-Of-Way will require an encroachment permit. Applicant should plan accordingly. **C-2**
- Please note that there is an active bridge replacement project at San Antonio Creek Bridge on Route 150. This project will require on-site mitigation. If arundo removal will occur adjacent to this structure, please coordinate with Caltrans, Division of Environmental Planning so any conflicts between landscaping efforts can be avoided. **C-3**

This concludes review of this document, and the opportunity to review this project is much appreciated.

Sincerely,

Ron Kosinski

Ron Kosinski, Deputy Director
Division of Environmental Planning
District 07

RECEIVED
AUG 19 2009
WATERSHED PROTECTION DIST.

Comment Set D: Ventura County General Services Agency, Parks Department

From: Theresa Lubin
To: Elizabeth Martinez
Date: 7/10/2009 11:16 AM
Subject: Map of proposed staging area
Attachments: Soule Park Arundo Removal Staging Area.pdf

Hi Elizabeth,

Here's the amp as promised and a couple of suggested changes for the document.
Pg 17 Recreation mitigation R-1:
Under monitoring action, please change Soule Park Ranger to *Ventura County Parks Maintenance Manger of his/her designee* **D-1**
Pg 18 R-2 same change **D-2**

Pg A-10 ***Chipping***
First sentence second paragraph please delete the part highlighted in red as follows: " An area of approximately one to two acres ..." **D-3**

Pg B-98
First sentence in last paragraph same change as above please. **D-4**

thanks for your attention to these few recommended changes.
sincerely,
Theresa

Comment Set E: Ventura County Public Works Agency, Integrated Waste Management Division

County of Ventura
Public Works Agency
Integrated Waste Management Division
MEMORANDUM

Date: July 10, 2009

To: Pam Lindsey, Watershed Ecologist
Ventura County Watershed Protection District

From: Derrick Wilson, Staff Services Manager
Integrated Waste Management Division

Subject: **Upper San Antonio Creek Watershed Giant Reed Removal Project**
Notice of Availability/Notice of Intent to Adopt (NOA/NOI)
Mitigated Negative Declaration & Supporting Initial Study

The Integrated Waste Management Division (IWMD) has completed its review of the Mitigated Negative Declaration (MND) and supporting Initial Study (IS) for this project. The Watershed Protection District submitted these documents to the Public Works Agency's Development & Inspection Services Division for circulation on June 18, 2009. Upon review, the IWMD has determined the impact of the proposed project to permitted solid waste disposal facilities in Ventura County is "Less Than Significant" and has prepared an Initial Study Checklist. *(See Attached)* **E-1**

The Watershed Protection District is to comply, to the extent practicable, with the general requirements of Ventura County Ordinances #4308 (solid waste handling, disposal, waste reduction, waste diversion) and #4357 (requirements for the diversion of construction and demolition debris from landfills by recycling, reuse, salvage) to assist the County in its efforts to meet the requirements of Assembly Bill 939 (AB 939). AB 939 mandates all cities and counties in California to divert a minimum of 50% of their jurisdiction's solid waste from landfill disposal. Both of these Ordinances can be viewed in their entirety on the IWMD's website at www.wasteless.org/landfills/ordinance4357. **E-2**

The IWMD recommends the following Contract Specifications to the Watershed Protection District in regards to this project:

1. **Recyclable Construction Materials**
   The contract specifications shall include a requirement that all recyclable construction materials generated during all phases of this project be recycled at a permitted recycling facility. All non-recyclable materials shall be disposed of at a permitted disposal facility. For a complete list of recyclable construction materials, please review the *Director's List of Commercial Recyclables* at: www.wasteless.org/directorslist **E-3**

Comment Set E: Ventura County Public Works Agency, Integrated Waste Management Division

2. **Green Materials - Recycling & Reuse**
The Contract Specifications shall include a requirement that all wood waste and vegetation slated for removal during this project will be diverted from the landfill. This can be accomplished by on-site chipping and land application at the project site, or by transporting the material(s) to an authorized or permitted greenwaste facility in the County. Should Arundo and Castor Bean plant remnants be deemed inappropriate for land application, a permitted greenwaste facility in Oxnard will accept both materials, process them to meet bio-fuel specifications, and haul them to an out-of-county co-generation facility. Illegal disposal and landfilling of recyclable organic material is prohibited.

3. **Sediment and Soil - Recycling & Reuse**
The contract specifications shall include a requirement that sediment and soil that is not reused on-site will be transported to an authorized or permitted facility for recycling or reuse. Illegal disposal and landfilling of recyclable sediment and soil is prohibited.

E-3, cont.

4. **Quantification of Materials Diverted from Landfill Disposal by On-Site Reuse or Recycling**
The contract specifications for this project shall include a requirement that the contractor(s) create, and submit, a *Summary Table* to the IWMD at the conclusion of this project. The *Summary Table* shall include the TYPE of MATERIAL (e.g., green materials, concrete, asphalt, soil), and approximate WEIGHT of:
   - All recyclable materials generated during the Giant Reed Removal Project that were reused on-site, or
   - All recyclable materials generated during the Giant Reed Removal Project that were transported to a local greenwaste facility for eventual use as bio-fuel at an out-of-county co-generation facility, and
   - The complete name and address of the facilities where recyclable materials were transported for recycling or reuse as bio-fuel.
     - Receipts and/or documentation are required for each entry to verify that recycling or reuse occurred and the materials were not landfilled.

Thank you for providing the IWMD with an opportunity to comment on this project. Please send a copy of the final specifications to the IWMD via Brown Mail #1650. Should you have any questions regarding this memo, please contact Pandee Leachman at 805/658-4315.

Ec: Larry Cardozo, PWA Development and Inspection Services

Comment Set E: Ventura County Public Works Agency, Integrated Waste Management Division

Upper San Antonio Creek Watershed – Giant Reed Removal Project

INITIAL STUDY CHECKLIST
PUBLIC FACILITIES/SERVICES
Section 24: Waste Treatment/Disposal

Integrated Waste Management Division

	ISSUE (Responsible Department)	PROJECT IMPACT DEGREE OF EFFECT*				CUMULATIVE IMPACT DEGREE OF EFFECT*			
		N	LS	PS -M	PS	N	LS	PS -M	PS
PUBLIC FACILITIES/ SERVICES:	24. Waste Treatment/Disposal:								
	C. Integrated Waste Management Division (PWA)		X				X		

DEGREE OF EFFECT:

N = No Impact.
LS = Less Than Significant
PS-M = Potentially Significant Impact Unless Mitigation Incorporated.
PS = Potentially Significant Impact.

JUSTIFICATION

The Integrated Waste Management Division (IWMD) has reviewed the project materials received on June 19, 2009 for the Upper San Antonio Creek Watershed Giant Reed Removal Project. The IWMD has determined the degree of effect to permitted solid waste disposal facilities in Ventura County from this project to be "Less Than Significant."

Pursuant to the IWMD's factors determining the significance of project impacts to solid waste facilities within Ventura County, any discretionary development project generating solid waste will impact the County's remaining solid waste disposal capacity. Additionally, as required by California Public Resources Code (PRC) 41701, Ventura County's Countywide Siting Element (CSE), adopted in June of 2001 and updated annually, confirms Ventura County has at least 15 years of disposal capacity available for waste generated by in-County projects. Therefore, because the County currently exceeds the minimum disposal capacity required by state PRC, no individual project of this type and magnitude will significantly impact the County's remaining solid waste disposal capacity.

Comment Set F: Ventura County Air Pollution Control District

VENTURA COUNTY
AIR POLLUTION CONTROL DISTRICT
Memorandum

TO: Pam Lindsey, Watershed Protection District

DATE: July 27, 2009

FROM: Alicia Stratton

SUBJECT: Request for Review of Mitigated Negative Declaration for the Upper San Antonio Creek Watershed Giant Reed Removal Project

Air Pollution Control District staff has reviewed the subject project, which is a proposal to remove giant reed where it occurs along upper San Antonio, McNell, Thacher and Reeves Creeks in the east end of the Ojai Valley. The project would involve initial herbicide treatments, then chipping, followed by herbicide retreatments. The initial removal activities would take eight weeks to complete. Chipping would occur Mondays through Fridays and involve five to seven truck trips per day to Soule Park from removal sites for chipping. Final retreatment would take approximately ten days to complete.

Section B.3 of the initial study addresses air quality issues. We concur with the findings of this discussion that implementation of the project would result in short-term exhaust emissions and fugitive dust generated by the small mechanical removal equipment that would be used, the chippers and motor vehicles. Table B.3-3, *Summary of Emission Estimates for Mechanical Removal Equipment,* indicates that short term emissions from equipment would be 4.68 lbs/day ROC and 14.11 lbs/day NOx. Short-term NOx emissions would exceed the five lbs/day significance threshold for the Ojai Planning Area. Because these are temporary in nature, they are not counted towards the significance thresholds. Incorporation of Mitigation Measures MM AQ-1, 2, and 3 will minimize short-term impacts from the project. In addition to those measures, we recommend the following condition be applied to all project phases to ensure compliance with APCD dust rules and regulations:

> All project construction and site preparation operations shall be conducted in compliance with all applicable VCAPCD Rules and Regulations with emphasis on Rule 50 (Opacity), Rule 51 (Nuisance), and Rule 55 (Fugitive Dust).

F-1

If you have any questions, please call me at (805) 645-1426.

Comment Set G: Meredith Clement, Kennedy/Jenks Consultants

From: "Meredith Clement" <MeredithClement@KennedyJenks.com>
To: "Pam Lindsey" <Pam.Lindsey@ventura.org>, "Martha Symes" <Martha.Symes@ve...
Date: 6/30/2009 5:17 PM
Subject: Forwarded on Mitigated Negative Declaration for Upper SanAntonio Creek Giant Reed Removal
Attachments: WaterBoardLogo.doc

Hello:

Just to let you know I sent the SWRCB the Mitigated Negative Declaration for the Upper San Antonio Creek Giant Reed Removal project.

I had one teensy comment on the document. Because this document is being funded in part by the SWRCB, the document should include the State Board logo (attached) and the text:

G-1

"Funding for this project has been provided in full or in part through an agreement with the State Water Resources Control Board. The contents of this document do not necessarily reflect the views and policies of the State Water Resources Control Board, nor does mention of trade names or commercial products constitute endorsement or recommendation for use"

Maybe you could work this into the final document.

--Meredith

Meredith Clement | Water Resources Project Manager
Kennedy/Jenks Consultants
1000 South Hill Road, Suite 200 | Ventura, California 93003
P: 805.658.0607 | F: 805.650.1522
<http://www.kennedyjenks.com/> <http://www.kennedyjenks.com/>
<http://www.kennedyjenks.com/>

Comment Set H: Estelle Foster

From: "Estelle Foster" <estelle2@cox.net>
To: <Pam.Lindsey@Ventura.org>
Date: 7/20/2009 4:03 PM
Subject: Dear Ms. Lindsey

>
> Dear Pam Lindsey,
>
> It is beyond important to the residents of the Ojai Valley that all
> the viable options to toxic chemical spraying of Arundo Grass be
> fully explored.
>
> There are existing viable options, and viable potential options that
> are fiscally feasable, and beneficial to both the County, and the
> Public.
>
> The Public fully supports our County's past decisions, and choices
> that have been forward thinking, and visionary. H-1
>
> It is important that you, Ms. Lindsey, and our Board of Supervisors,
> continue to make those kind of forward thinking, and visionary
> decisions regarding Arundo.
>
> We urgently request that you advocate for public health, and safety on
> this issue, by supporting this mutually beneficial approach.
>
> Your history of past good works is very much appreciated. We thank
> you in advance for your support of choosing, and supporting options to
> chemical removal of Arundo.
>
>
> With all best wishes,
>
> Estelle Foster
>
> estelle2@cox.net
>
>

Comment Set I: Judith Elliott

From: "judith elliott" <judithsherbals@sbcglobal.net>
To: <Pam.Lindsey@ventura.org>
Date: 7/20/2009 10:18 PM
Subject: herbicides and pesticides

Dear Ms. Lindsey,

In view of all the scientific documentation now available, it is the only sensible choice to use safe, non-toxic alternatives to pesticides and herbicides to manage our lands, waterways and other natural resources. **I-1**

It is very unwise to continue to pollute our environment with carcinogenic substances. This abomination to humanity and God must be stopped!

In addition, clearly it is far more economically prudent to spare the massive amounts of money used on toxic termination programs which is funneled to a very few chemical manufacturers and use it to solve some of the unemployment problems. **I-2**

Let us use our tax dollars for a health care program to benefit people, not to create more chemicals to make the people sick and poison the environment!

Where are our values in a system like that? **I-3**

As a mother, I appeal to you. As a human being, I plead with you!!! As a cancer survivor of 30 years, I scream to you !!! Living with, dealing with cancer is horrible!!!!!!!!

Vote for life! NOT DEATH! and a slow, agonizing one at that...

Sincerely, Judith Elliott 415-868-1428

Comment Set J: Sharon Monet

From: "Sharon Monet" <sharonmonet@hotmail.com>
To: <pam.lindsey@ventura.org>
Date: 7/21/2009 9:21 AM
Subject: Alternative Methods for Erradicating

Hello,
As a concerned citizen of Ventura County (Ojai) I am requesting that you seek alternative, pesticide free, methods to eradicate arundo in Ventura County.

The Ventura Star just did an extensive article on all of the toxic waste that gets into the water ways and ultimately in the drinking water. This was an alarming article and yet as reported, the old ways continue even with fines; cleanup not completed and regulation weak.... J-1

We can stop the excessive use of toxic materials in our environment but it has to start at the top. We don't have time to rest on our laurels, as our environment continues to be damaged, and extremely unhealthful.

What would it take for your organization to make this change to a healthier way of eradicating pests and invasive plants? Are you concerned as well or is this even on your radar?

I am interested in your response,

Sharon Monet

Comment Set K: Robin Bernhoft

From: "Robin Bernhoft, MD" <drb@drbernhoft.com>
To: <Pam.Lindsey@ventura.org>
Date: 7/21/2009 7:38 AM
Subject: CC on arundo letter to Steve Bennett

Dear Supervisor Bennett:

I would like to encourage your search for non-toxic alternatives to glyphosate for arundo removal.

I am told that iceplant has been eradicated in several areas along the coast by cutting it off and applying sheets of vizqueen (sp?) which heats and dehdrates the roots. I have heard this approach has been successful with arundo, as well, in various areas throughout Southern California, including a canyon in the Pasadena area which had a large infestation. **K-1**

I think we could supply a great many volunteers from Pesticide Free Ojai and from the Green Coalition to do the labor; some could also of course be contracted, with our 10% unemployment rate in the county, no doubt at a much lower budget than the current chemical arrangments. Last year, during the Matilija glyphosate debate, one of our PFOV members found a company with a commercial interest in the arundo canes; they are still around. **K-2**

It would be good to find a non-toxic solution, as I notice in Matilija Canyon the sprayed arundo keeps sprouting green shoots out of brown stalks, suggesting glyphosate won't work, long term. Also, given the proven medical toxicity of glyphosate, a non-toxic solution in the watershed would be more appropriate for us all. **K-3**

Thank you for your ongoing environmental concern.

Sincerely,

Robin Bernhoft, MD
Ojai

cc: Pam Lindsey

Comment Set L: Marleen Luckman

From: "Marleen Luckman" <saferlivingspaces@gmail.com>
To: <pam.lindsey@ventura.org>
Date: 7/21/2009 11:15 AM
Subject: Preserving the Ojai Watershed - Use of nontoxic approaches toremoving Arundo

Dear Pam,

I am very concerned about the proposal to use Roundup to kill the arundo in the San Antonio, Thacher, and other waterways throughout the Ojai Valley.

The active and inert ingredients impact and destroy aquatic life according to many documented and published scientific studies. It seems that most of the studies that are usually cited to defend the use of Roundup are conducted or backed by Monsanto, the manufacturer of the poison. Of course, it stands to reason, that just as public officials cannot vote on issues in which they have personal interest or potential personal gain, studies paid for by Monsanto should not be used to make important decisions concerning the health of our ecosystems. **L-1**

I support a manual remediation process that could employ Ojai residents who are in need of work. It would help revitalize our town's economy while preserving our watershed. Although I have not seen the previous study done on manual removal, I suspect that in the long run, manual remediation processes would not take any longer and would not cost any more. **L-2**

I am anxious to read the new manual removal study called for by Supervisor Bennett in last Tuesday's meeting.

--
Marleen Luckman, MS, BBEI
Safer Living Spaces
Green Team Operations Coordinator
Ojai Unified School District

Comment Set M: Byron Rader

From: <Radtoth@aol.com>
To: <Pam.Lindsey@ventura.org>
Date: 7/22/2009 5:17 PM
Subject: roundup

"An epidemiological study of Ontario farming populations showed that exposure to Glyphosate, the key ingredient in Roundup, nearly doubled the risk of late miscarriages. Seralini and his team decided to research the effects of the herbicide on human placenta cells. Their study confirmed the toxicity of Glyphosate, as after eighteen hours of exposure at low concentrations, large proportions of human placenta began to die. Seralini suggests that this may explain the high levels of premature births and miscarriages observed among female farmers using Glyphosate"|. They found that the toxic effect increases in the presence of Roundup "adjuvants' or additives. These additives thus have a facilitating role, rendering Roundup twice as toxic as its isolated active ingredient, Glyphosate.

A study, released in April 2005 by the University of Pittsburgh, suggests that Roundup is a danger to other life forms and non-target organisms. Biologist Rick Relyea found that Roundup is extremely lethal to amphibians. In what is considered one of the most extensive studies on the effects of pesticides on non-target organisms in a natural setting, Relyea found that Roundup caused a 70 percent decline in amphibian biodiversity and an 86 percent decline in the total mass of tadpoles. Leopard frog tadpoles and gray tree frog tadpoles were nearly eliminated. **M-1**

"In 2002, a scientific team led by Robert Belle of the National Center for Scientific Research (CNRS) biological station in Roscoff, France showed that Roundup activates one of the key stages of cellular division that can potentially lead to cancer. Belle and his team have been studying the impact of Glyphosate formulations on sea urchin cells for several years."

There are completed 10 year studies that identify Roundup as the cause for Non-Hodgkins Lymphoma. The Federal Government is behind in their research. Please do not use this is our watershed. It is a known carcinogen!

Byron Rader
Ojai, California

Comment Set N: Lynda Rader

From: <Radtoth@aol.com>
To: <Pam.Lindsey@ventura.org>
Date: 7/22/2009 5:15 PM
Subject: (no subject)

"An epidemiological study of Ontario farming populations showed that exposure to Glyphosate, the key ingredient in Roundup, nearly doubled the risk of late miscarriages. Seralini and his team decided to research the effects of the herbicide on human placenta cells. Their study confirmed the toxicity of Glyphosate, as after eighteen hours of exposure at low concentrations, large proportions of human placenta began to die. Seralini suggests that this may explain the high levels of premature births and miscarriages observed among female farmers using Glyphosate"|. They found that the toxic effect increases in the presence of Roundup "adjuvants' or additives. These additives thus have a facilitating role, rendering Roundup twice as toxic as its isolated active ingredient, Glyphosate.

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"In 2002, a scientific team led by Robert Belle of the National Center for Scientific Research (CNRS) biological station in Roscoff, France showed that Roundup activates one of the key stages of cellular division that can potentially lead to cancer. Belle and his team have been studying the impact of Glyphosate formulations on sea urchin cells for several years."

PLEASE DON'T USE ROUNDUP IN OUR WATERSHED.

Lynda K Rader
Ojai, California

Comment Set O: Susan Draffan

Pam Lindsey - San Antonio Creek Arundo Removal Project comments

From: "Susan Draffan" <sdraffan@sbcglobal.net>
To: <Pam.Lindsey@ventura.org>
Date: 7/22/2009 12:06 PM
Subject: San Antonio Creek Arundo Removal Project comments
CC: <steve.bennett@ventura.org>

Dear Pam,

I am a resident of Ventura County and live in the residential area bisected by Thacher Creek. I am writing in opposition to the proposed application of glyphosate and related surfactants in both residential and wildlife areas and in our public watersheds.

I base my opposition on a number of factors. One is the safety of our neighborhood well, used for drinking and other household water uses. Another is that I don't want myself, my neighbors or the animals or wildlife in our neighborhood, or those in other areas of our county, exposed to toxic chemicals. A third reason is that I deeply desire to have our community engage in a more sustainable paradigm for the health and well being of all life forms that share this part of the planet. **O-1**

I agree with the reasons to remove Arundo and with the logic of removing the Castor Bean at the same time. I too would like to see the watershed and other areas of our county freer from invasive species so that the natives can flourish. However, I also believe that nature changes and adapts and progresses over time. It always has, and always will despite human efforts to alter or retain whatever conditions we choose. I believe a balanced approach to restoring natural habitat is desirable; one that involves respect for the multitude of life forms already present and that promotes the well being of all residential and migratory species. I think ends need to justify the means, and I am not convinced that this treatment method qualifies. **O-2**

I realize there is a balance to be struck between creating the positive changes promoted in this proposal and realistic actions that can ensure their successful implementation. But rather than relying on toxic methods as an initial approach to addressing a longstanding problem, I would like to see alternative methods of eradication attempted before resorting to the use of poisons that will knowingly affect our air quality, however temporarily, not to mention damaging effects on plant, animal, insect, bird and even microbe life. While impact studies may judge the short term and lingering effects of introducing such toxins into our environment to be null or insignificant, I do not believe these to be comprehensive or realistic conclusions.

Some studies have claimed that Glyphosate is not sufficiently harmful to cause concern, and that as "inactive" ingredients, the surfactants used with it are not under consideration. I urge you to collate opinions from a variety of resources. It is inadequate to simply accept the claims of chemical manufacturers regarding the supposed safety of their products when they have an inherent conflict of interest in promoting their goods. There are many published studies on the safety factors of Glyphosate. **O-3**

Medical research reveals that some people cannot metabolize Glyphosate, the surfactants used with it, and other such toxins. The mitigation report contained in this proposal acknowledges that there will be collateral damage to a variety of life forms, including endangered species. I don't believe that anyone honestly knows the extent of adverse future effects to humans or other species exposed to these chemicals. In addition to the humans and other animals, there are the plants, soil and water tables, and **O-4**

Comment Set N: Susan Draffan, continued

the insects and birds who are pollinating and consuming treated plant materials and being exposed to the soils and waters. This includes not only rivers, streams and run off which reportedly remain clear of toxic residue after these treatments, but also underground water. Just because we haven't yet developed the capacity to scientifically measure something doesn't mean it isn't happening. And it only stands to reason that toxins may be more poisonous to our living ecology than we yet realize. Disparities between scientific estimates and actual consequences of many chemical products has shown this to be very true in the past. **O-4, cont.**

Aside from safety concerns, we have logistic and notification concerns. The available mitigation and study report for this project contains a map delineating areas intended for treatment with color coded designations based on the percentage of Arundo coverage, stating that areas containing greater than 20% Arundo coverage are to be sprayed. However, the legend on the map has color codes for 0 - 15% and from 50 - 80% coverage. Does this mean we can't determine all the regions being sprayed from reading this map? It seems unlikely that there are no areas between 15 - 50% coverage, causing us to wonder if the public is not being fully informed about the scope of the plan. **O-5**

In hiking through the national forest adjacent to Ojai this year, we have encountered large brush piles of dead Arundo, presumably left to rot.there eventually rather than hauling it away. I don't think the forest or the wildlife residing in it should be littered with this rubbish and the humans who live and visit here should not have to encounter it. I spend time picking up human trash every time I go hiking, but these huge unnatural piles of plant debris should be removed by an appropriate agency. I wonder about the fire hazards these piles create, also. Disposing of cut and treated plant material is a whole other issue. We do not think that material exposed to toxins belongs in mulch on public property. **O-6**

I respectfully request that your office err on the side of wellness for all living beings in our county. It must be a daunting responsibility to decide what level of collateral, lethal and extinctive damage to humans and biological dwellers is acceptable in order to eradicate nonnative invasive species from our watersheds after decades of misuse, abuse and evolution. I respect your position and hope you agree that:
a) government should safeguard public health and safety, not contribute to its detriment, and
b) we humans should steward this environment we are blessed to live in, not dominate it or poison it. **O-7**

To this end, I urge you to pursue all potential nontoxic means for any biological control deemed necessary, and to not simply rely on established protocols, the quickest fix, or prejudiced industrial claims. We might well choose to impact fewer of our natural resources if we truly understood more about the ramifications of our actions than we do.
Thank you very much for hearing my opinions and requests. I sincerely appreciate your efforts and the huge responsibilities you have accepted on behalf of our county.

Susan Draffan and David Buehrens
413 Avenida del Recreo
Ojai CA 93023
sdraffan@sbcglobal.net

Comment Set P: Noreen Murano and Anna Huber, Wildscape Restoration

Wildscape RESTORATION

July 28, 2009

Pam Lindsey
Ventura County Watershed Protection District
800 S. Victoria Avenue
Ventura, CA 93009-1610

Subject: Review and Comments for the Mitigated Negative Declaration and Initial Study for the Upper San Antonio Creek Watershed Giant Reed Removal Project (June 2009), Project No. 11034

Dear Pam,

Thank for the opportunity to review the Mitigated Negative Declaration and Initial Study for the Upper San Antonio Creek Watershed Giant Reed Removal Project, and to provide the Ventura County Watershed Protection District with comments on the document.

Although the comment period expired on July 22, 2009, you confirmed in our telephone conversation of Thursday, July 23, 2009, that you would be willing to receive our comments provided they are submitted prior to Wednesday, July 29, 2009.

Our review of the document included the Mitigated Negative Declaration (pages 1 - 18) and Section B.6 - Biological Resources of the Initial Study (pages B-24 - B-44). Selected pages (see comments below) of Section A - Initial Study Checklist where also reviewed in those instances that they contained text which was mirrored in the Mitigated Negative Declaration.

Comments

Comment 1: [p.2, paragraph 2] - Re: Cut and daub method. The description for the foliar spray method in paragraph 3 provides an estimated amount of herbicide to be used. Would it be possible to include such an estimate for the cut and daub method as well? **P-1**

Comment 2: [p.2, paragraph 3 and p.B-37, paragraph 2] - Re: Foliar spray treatment. The text states, "Once dead, the plant material would then be either left in place or taken to a local green waste or landscaping company for its use as groundcover, mulch, or other purposes."

However, on p. 4, in paragraph 3, the text states, "All chipped material would be used by the Ventura County Parks Department for mulch, trail and ground cover, or other uses as identified by the Parks Department." As these statements seem to be contradictory, some clarification about who will receive the biomass would be useful. **P-2**

2977 Sexton Canyon Road ▪ Ventura, California 93003 ▪ Phone: 805-644-6852 ▪ Fax: 805-642-3164
Contractor's Lic. #890771 ▪ QAL #108885 ▪ DBE/MBE/WBE #36836 ▪ OSBCR SBE #50714
www.wildscaperestoration.com

Comment Set O: Noreen Murano and Anna Huber, Wildscape Restoration, continued

Comments
Review of Mitigated Negative Declaration and Initial Study
Upper San Antonio Creek Watershed Giant Reed Removal Project
Page 2

Also, no indication is given about how the dead, standing canes will be cut and removed from the site. Will chainsaws or brush cutters be used for cutting? Will the cut canes be taken off-site by hand or with a small loader?

The reference that the dead material will be used "as groundcover" is also confusing as groundcover is often living, low-growing plant material.

It would also be useful to clarify whether the dead, cut canes will be chipped once they're removed, who will do the chipping, and where the chipping would occur. **P-2, cont.**

Comment 3: [p.3, paragraph 1 and p.A-9, paragraph 4] - Re: opportunistic removal of castor bean by foliar spray. The text indicates that seed heads from plants will be cut with clippers or loppers prior to herbicide application, and that they will be "hauled" to a landfill. The text should also indicate that the seed heads will be bagged as they are cut in order to keep the seeds confined and to make transport more convenient.

Later in the same paragraph, the text indicates that if the dead standing castor bean plant material is to be removed, it "would be bagged or otherwise wrapped prior to transport." Since the seed heads would have been removed prior to spraying, there is not really a need to go through the exercise of bagging or wrapping the dead shrub to transport it, as paragraph 2 on p.4, and paragraph 5 on p.A-10, indicate the dead castor bean material may also be chipped. **P-3**

Comment 4: [p.3, paragraph 2 and p.A-10, paragraph 2] - Re: Posting and notification. The text states, "The VCWPD would also notify all property owners of removal activities by mail at least two weeks prior to any work." Is the notification for property owners within the project site, for owners adjacent to the project site, or at some distance from the project site? Presumably, access permission will have been obtained from owners whose property lies within the project boundary, so this should be indicated in this paragraph as well. **P-4**

Comment 5: [p.3, paragraph 3 and p.B-36, paragraph 3] - Re: PCA and herbicide application. Individuals with PCA certification often aren't part of the crew performing herbicide application in the field. Rather, herbicide application is done by individuals who hold QAL or QAC certification or by individuals who are supervised by a QAL or QAC. The PCA typically doesn't do the supervising, and may not necessarily hold a QAL/QAC. The PCA's role is generally to write the recommendation for proper herbicide application. **P-5**

Comment 6: [p.4, paragraph 1 and p.A-9, paragraph 1] - Re: Starting project activities prior to September 15. The text states that protocol surveys would be performed if work starts before the 15th. As protocol surveys can require a certain commitment of time, it may be helpful to indicate that such surveys would be performed if the start time is a substantial amount prior to the 15th. If potential existed for work to start only a week ahead of the end of bird breeding season, wouldn't it be more practical to wait a week?

For example, in the last paragraph on p.B-39, the text states, "Project-related activities could commence by September 1, 2009. However, if project-related activities occur prior to September 15th, the VCWPD would conduct protocol surveys for ..." **P-6**

Wildscape RESTORATION

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Comment Set O: Noreen Murano and Anna Huber, Wildscape Restoration, continued

Comments
Review of Mitigated Negative Declaration and Initial Study
Upper San Antonio Creek Watershed Giant Reed Removal Project
Page 3

Comment 7: [p.4, paragraph 4 and p.A-11, paragraph 2] - Re: Herbicide retreatments. No indication is given about what method will be used. **P-7**

Comment 8: [p.7, MM B-3; p.12, B-3; p.B-39, MM B-3] - Re: Project activities being conducted during surface flow. As the project site also includes McNell and Reeves Creeks, these channels should be included in the mitigation measure; no work should be conducted in these channels when surface flow is present either. **P-8**

Comment 9: [p.7, MM P-1 and MM C-1; p.12, P-1 and C-1; p.B-52, MM P-1; p.B-53, MM C-1] - Both of these mitigation measures differ in writing style from the other mitigation measures as they read like they are instructions; they lack the word "shall." **P-9**

Comment 10: [p.7, MM N-3; p.13, N-3; p.B-76, MM N-3] - Rather than make reference to the use of "random tooth spacing" for chainsaws, it may be better to indicate that 'skip chains' be used. 'Full skip' chains have every other tooth is removed, while 'semi-skip' chains are a combination of standard chain spacing and 'full skip'. Neither style has random spacing. However, both styles of skip chains are better used on saws with longer bars, when cutting large diameter materials. Using a skip chain on saw with a short bar (less than 28 inches) and when cutting uneven, small diameter objects such as giant reed canes can make the saw difficult to handle as the increased tooth-spacing creates a greater tendency for the saw to buck. **P-10**

Also, hand held brush cutters often have blades rather than teeth. Mechanical brush cutters or grinders, such as the implements that can be mounted on the front end of small skid-steer crawlers have teeth. The teeth of a mechanical brush cutter are randomly spaced, but the blades of a hand held brush cutter are evenly spaced. As this project utilizes hand-held equipment rather than large mechanical equipment, rewording of this mitigation measure would provide useful clarification.

We hope you find the comments we have provided useful. Please let us know if you have any questions or would like any additional information.

Sincerely,

Wildscape Restoration, Inc.

Noreen Murano, Principal

Anna Huber, Senior Project Manager

Wildscape RESTORATION

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Comment Set Q: Patty Pagaling

From: "Patty Pagaling" <protectmatilija@gmail.com>
To: <pam.lindsey@ventura.org>
CC: <steve.bennett@ventura.org>
Date: 7/29/2009 1:51 PM
Subject: Upper San Antonio Creek Watershed Giant Reed Removal Project

Dear Ms. Lindsey,

Thank you for the time extension for public comments regarding the Upper San Antonio Creek Watershed Giant Reed Removal Project.

We, as a community would like to encourage and support the county in creating a truly sustainable Ventura. We are aware that over 6 million pounds of pesticides were used in Ventura County last year. Let's encourage everyone in Ventura County to use safe, non-toxic alternatives to pesticides and herbicides. **Q-1**

We support non-toxic, manual removal of the arundo in all Ventura County watersheds, and are looking forward to working with the Watershed Protection District to implement sustainable solutions in all areas. **Q-2**

Sincerely,

Patty Pagaling
3316 Matilija Cyn Rd
Ojai, CA 93023
e-mail: pesticidefreeojaivalley@gmail.com
ph: 646-4294

Comment Set R: Renee Roth

From: "Renee Roth" <rraeroth@roadrunner.com>
To: <Pam.Lindsey@ventura.org>
CC: <steve.bennett@ventura.org>
Date: 7/29/2009 3:05 PM
Subject: Response to San Antonio Creek Draft of Mitigated Damages
Attachments: pam Lyndsey.doc

Pam Lindsey
Watershed Ecologist
Ventura County Watershed Protection District 800 South Victoria Avenue
Ventura, CA
Phone: 805-654-2036
Fax: 805-654-3350
Email: Pam.Lindsey@ventura.org

Dear Pam,

Thank you for extending the time to respond to the County's Draft Mitigated Negative Declaration and Initial Study, which discusses the arrundo removal methods from upper San Antonio, McNell, Thacher, and Reeves Creeks that extend between the southwest boundary of Soule Park and Soule Park Golf Course and private in-holdings within Los Padres National Forest.

The report does explain many things about the project. The projects has noble goals, to restore an ecosystem and to promote the accumulation of more water and native species. The maps and concentration levels are very helpful. Unfortunately, the report fails to disclose the unacceptable risks and costs to the environment that spraying of pesticides would have on endangered species, as well as public health and well being. The children and elderly are at highest risk for exposure in the treatment areas (The Thacher School, Monica Ross and San Antonio Elementary Schools and St Josephs Retirement Center) along with the public parks along San Antonio Creek and the Los Padres National Forest. **R-1**

We do have "at risk" populations in the treatment areas that should not be exposed to pesticides without their knowledge and consent. Why is the project going to start in September, when kids are returning to school and the parks are in use by kids practicing for sports? The young and elderly members of a population typically manifest both acute and chronic affects at lower levels of pesticide exposure. The adverse affects of pesticides are known to bio-accumulate as the poisons move up through the food chain, as we have seen with mercury in tuna. A student at San Antonio School, Colby Chapman, underwent bone-marrow leukemia treatments. The custodian of San Antonio School who recently retired has just been diagnosed with cancer, and is undergoing treatment. The public at large should also be given notice of any pesticide application on public land, not just the adjacent property owners. This will take time and money. **R-2**

The East End of Ojai is an orange and avocado orchard area, where Roundup is readily used to control weeds. The County should include testing of the water in the watershed and creeks to determine current levels of glyphosate and the inert ingredients in the proposed herbicide before any treatment begins, with test results made public. What are the concentration levels of pesticides currently being used in the area, and how do they impact the ground water and municipal water districts which currently provide water to residents in the area. It will take time and money to figure these out, **R-3**

Comment Set Q: Renee Roth, continued

and should be included in costs of the project. **R-3, cont.**

How do we know other invasive species won't inhabit the area once the arrundo and castor bean plants are sprayed or removed, and what about the nitrogen imbalance caused by spraying pesticides, and the native plants and animals whose habitat will be violated? Maybe native species need to be planted, and shouldn't those costs be included? **R-4**

I have questions about the area where the Percent Cover is Unknown – 11.17 Acres which represent approximately 15% of the treatment area? What is the proposed treatment method? **R-5**

I strongly believe that glyphosate based herbicides should not be used in any public area. Recent studies and research from around the world are finding direct links to cancer and glyphosate, along with malformations in amphibian embryos:

"Reduced head size, genetic alterations in the central nervous system, an increase in the death of cells that help form the skull, and deformed cartilage were effects that were repeatedly found in the laboratory experiments, said the biologist." said Professor Andrés Carrasco, director of the Laboratory of Molecular Embryology at the University of Buenos Aires medical school and lead researcher on the National Council of Scientific and Technical Research (CONICET). **R-6**
http://cosmicfantasia.com/200904161507/alternative-media/health-care/argentina-scientists-reveal-effects-of-glyphosate.php

The County should hold meetings open to the public in the Ojai area about the health risks and exposures associated with the use of pesticides for this project, the treatment methods proposed, and continue looking at options for removal of arrundo that do not damage the environment or affect public health. **R-7**

I've attached a letter sent to the EPA regarding an injunction to stop the spraying of pesticides near water that are in violations of the Endangered Species Act. **R-8**

These are a few comments that I hope will receive consideration in your planning process, so that the true costs of using pesticides can be compared with non-toxic alternatives.

Sincerely,

Renee Roth

CC:Supervisor Steve Bennett, steve.bennett@ventura.org

~Renee
805-646-4451

Comment Set Q: Renee Roth, continued

Stephan C. Volker
Joshua A.H. Harris
Bridget A. Roberts
Shannon L. Chaney
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10.420.01

July 16, 2009

VIA www.Regulations.gov

Office of Pesticide Programs (OPP)
Regulatory Public Docket (7502P)
Environmental Protection Agency
1200 Pennsylvania Ave, NW.
Washington, DC 20460-001

Re: EPA-HQ-OPP-2009-0481, Comments of North Coast Rivers Alliance on the Proposed Stipulated Injunction Involving Pesticides and Eleven Species Listed as Threatened or Endangered Under the Endangered Species Act, 74 FR 31427 (July 1, 2009)

To Whom it May Concern:

On behalf of North Coast Rivers Alliance ("NCRA"), we respectfully submit the following comments on the Proposed Stipulated Injunction Involving Pesticides and Eleven Species Listed as Threatened or Endangered Under the Endangered Species Act as noticed in the July 1, 2009 Federal Register, Volume 74, page 31427 et. seq., with docket number EPA-HQ-OPP-2009-0481. It is imperative that the proposed consultation between the Environmental Protection Agency ("EPA") and the U.S. Fish and Wildlife Service ("USFWS") ensure the proper protection of the affected species through increased transparency, accountability, and a thorough analysis of *all* of the direct and indirect impacts these pesticides may cause.

The Proposed Stipulated Injunction does not go far enough to protect these 11 species and their environment. While consultation with the USFWS is a good first step toward the protection of these species, as proposed, the consultation omits discussion of numerous important issues and fails to provide the public with all of the information necessary for their informed review. For these reasons and those explicated below, we request that EPA revise the injunction to include provisions and guidelines for ensuring an accurate and thorough review of the impacts of these 74 pesticides on the 11 species at issue.

I. The Proposed Stipulated Injunction Mistakenly Sets Up a Closed Door Process

NCRA agrees that the EPA should consult with USFWS and the National Marine Fisheries Service ("NMFS") under the Endangered Species Act ("ESA") before approving pesticides. However, the proposed consultation is insufficient to fully protect the species. While the ESA does not call for an open door process during the required consultation and the USFWS Section 7 Consultation Handbook even allows personal telephone calls to initiate consultation,

Comment Set Q: Renee Roth, continued

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these policies are not appropriate for the situation at hand. 16 U.S.C. §1531 *et seq.*; USFWS Section 7 Consultation Handbook, March 1998. The failure to require publicly held consultation poses unacceptable risks that the spraying of pesticides will have significant effects on both public health and the health and well-being of the listed species.

Section 7 consultation exists to protect the "continued existence of any endangered species." 16 U.S.C. §1536(a)(2). By omitting a requirement to conduct open door consultation from the Proposed Stipulated Injunction, the "continued existence" of many of these species is threatened. Under the current Proposed Stipulated Injunction, those most dedicated to the protection of endangered species will be denied a meaningful opportunity to assure effective protection of the potentially impacted species.

The spraying of pesticides over large areas of land affects not just the 11 species in question, but many other species and their subpopulations. The potentially pernicious effect of spraying pesticides calls for a consultation process that is open to public review and scrutiny. Increased transparency can only work for the benefit of the species that are protected by the ESA. The ESA "represent[s] the most comprehensive legislation for the preservation of endangered species ever enacted by any nation." *TVA v. Hill* (1978) 437 U.S. 153, 180. "Congress intended endangered species to be afforded the highest of priorities." *Id.* at 174.

Conducting these consultation behind closed doors jeopardizes the process and runs counter to the spirit of the ESA. Greater transparency and public involvement would remedy this problem, and therefore the Proposed Stipulated Injunction should be revised to include a public review process.

II. The Proposed Stipulated Injunction Does Not Guarantee An Adequate Evaluation of the Short- and Long-Term Effects of these Pesticides

The Proposed Stipulated Injunction must include guidelines requiring consideration of both long-term and short-term effects of pesticide exposure. Furthermore, all pathways of exposure must be fully analyzed, including dermal exposure, inhalation, and ingestion. Exposure to toxic chemicals can have both immediate impacts, such as a respiratory disease from inhalation exposure, and unexpected indirect effects. For example, dermal exposure can cause not only an expected rash, but through absorption into the blood stream, unexpected severe and negative effects on the liver or kidneys.

Additionally, the Proposed Stipulated Injunction should include provisions to ensure that the effects of the pesticides in question are tested on species that will be impacted or species that have a similar sensitivity to those that will be impacted. Very often, these pesticides are tested on other organisms, such as the Daphnia magna. Gary L. Diamond, Patrick R. Durbin, *Effects of Surfactants on the Toxicity of Glyphosate, with Specific Reference to RODEO* (1997). While the Daphnia magna may be a useful resource in testing the basic effects of a pesticide, the sensitivity levels of the Daphnia vary greatly from those species affected in the instant case. Due to the

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different sensitivity levels of species, the Proposed Stipulated Injunction should require the consideration of effects on species with similar sensitivity levels to those affected.

A. Impacts on Prey/ Food Chain

NCRA requests that the Proposed Stipulated Injunction include language to ensure the long-term protection of the species at issue. The adverse effect of pesticides may bioaccumulate (become magnified) as the poisons move up through the food chain. While a pesticide may not cause immediate harm to an animal on initial contact, it can subsequently harm or even kill the animal due to continuous ingestion of exposed prey or other long-term exposure. While a large animal such as the California Clapper Rail, may not suffer immediate harmful effects, any of the pesticides in question may have continuous effects on some of the Clapper Rail's prey. For example, should shrimp, clams, or snails accumulate high levels of pesticides, the Clapper Rail's continuous ingestion of these pesticide infected species could negatively impact and potentially kill the Clapper Rail.

In addition to the exposure caused by pesticide accumulation within the food chain, pesticides can also eliminate food sources. Eradication poses the risk of complete loss of a food source, creating an unsustainable environment and an increased risk of extinction for any species that relies on that food source.

For these reasons, the Proposed Stipulated Injunction should address long-term impacts. These guidelines should require a thorough analysis and discussion of the effects not just on the endangered species listed in the lawsuit, but on the prey of those species, which could severely impact the endangered species' ability to survive a pesticide spraying.

B. Chronic Health Effects

Furthermore, the effects of these pesticides on these 11 endangered species must be evaluated on a long-term basis. Exposure to these detrimental chemicals can cause future carcinogenic or mutagenic effects. Without evaluating whether these pesticides cause such effects within the subject species, the EPA and USFWS consultations will not adequately address the harms posed by these pesticides.

These pesticides pose additional long-term effects on the survival of these species by affecting offspring as well. Exposure to many of these pesticides can lead to reproductive defects and mutations in the offspring of those exposed to the chemicals. Without the proper review, no adequate decision can be made to ensure the protection of these vitally important species.

Although the Center for Biological Diversity ("CBD")'s Complaint and 60 Day Notice of Intent to File Suit addressed these effects, the Proposed Stipulated Injunction fails to respond to

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these concerns. Therefore, the Proposed Stipulated Injunction must be revised to ensure that each pesticide's significant long-term chronic effects are adequately considered.

C. Effects on Vulnerable Life Stages

The Proposed Stipulated Injunction should require an adequate and thorough discussion of the impacts of these pesticides on not only the adult populations of the species at hand, but all life-stages of the species. Immature and juvenile populations make up the most vulnerable groups of many species, and their survival is instrumental to species recovery. If pesticides weaken or kill off the immature members of a species before they have a chance to reproduce, drastic population decline is inevitable. Immature members of a population typically manifest both acute and chronic effects at lower levels of pesticide exposure, compared to their fully-grown or fully-matured counterparts. Also, they often do not yet have survival skills which may protect older members from exposure. Any ESA Section 7 consultations conducted pursuant to the Injunction must consider these factors.

For these reasons, the Proposed Stipulated Injunction should be revised, ensuring that consultations address the vulnerabilities of certain members of an endangered population.

D. Degradation of Products

The Proposed Stipulated Injunction is insufficient because it does not ensure that the consultation will address the manner in which pesticide products degrade or accumulate within the environment. Also, the active ingredients of many of the pesticides subject to the Proposed Stipulated Injunction become more toxic as they degrade into their component parts. Chlorpyrifos, for example, degrades into chlorpyrifos oxon which poses even more dangerous neurological risks than chlorpyrifos itself. In order to adequately evaluate the impacts of pesticides on the subject species, the consultations must address the effects of such toxic degradants.

Additionally, many pesticides do not degrade rapidly; instead they persist in the environment long after they have been applied. As these chemicals linger, the likelihood that they will damage vulnerable species increases. The products in question have differing rates of degradation and therefore, each pesticide's degradation rate should be taken into account when evaluating its long-term impact on a species. The Proposed Stipulated Injunction should require consideration of this important issue.

Furthermore, many of these toxic substances will not simply be used one time, but rather require continuous yearly spraying in order to maintain their effectiveness. The long-term impacts of continuous yearly spraying must be evaluated during the Section 7 consultation process, as discussed below. Because there is no requirement to do so, the Proposed Stipulated Injunction should include a provision that requires the evaluation and discussion of the long-term impacts of continuous yearly use of these toxic pesticides.

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E. Other Secondary Effects

Any analysis of the effects of these pesticides must address the secondary effects of their release on the environment. Pesticides that may not be acutely toxic upon short-term exposure may still act to eliminate threatened and endangered species through these secondary effects on the environment.

An example of such secondary effects would be the increase of nitrogen in the environment and the decline of the Bay Checkerspot Butterfly. As nitrogen emissions increase in an area, the composition of the soil changes within the butterfly's habitat. This change allows the increase in invasive plants, which choke out the butterfly's native nectar sources. Pesticides which release nitrogen into the environment have the potential to decrease the habitat for this endangered species without posing a direct toxic risk to the animal itself. This is just one example, however, of how the presence of a pesticide can weaken the natural ecological balance in an area, allowing invasive species to take hold to the detriment of an endangered species. The Proposed Stipulated Injunction should be revised to insure that these types of secondary effects are addressed within the consultation process.

III. Cumulative Effects

Any evaluation of the effects of these 74 pesticides on the 11 species addressed within this lawsuit should look at the cumulative effects of pesticide use on these species and the environment. The Proposed Stipulated Injunction does not mention whether the proposed consultations will address these effects. Assessing the risk of each pesticide in a vacuum does a disservice to the species that the ESA was inactive to protect because it fails to evaluate the synergistic effects of multiple pesticides on the environment and threatened and endangered species. For this reason, the Proposed Stipulated Injunction should be revised.

As mentioned above, pesticide use affects more that the target species. It has effects on entire food-chains. Therefore, USFWS should examine how prolonged use of these pesticides, alone and together, will cumulatively impact the food-supply chains for these endangered species.

The EPA is already aware of the United State Geological Survey studies regarding these cumulative effects, as the CBD cited frequently to them in its complaint and 60 day notice of intent to file suit. NCRA believes that the Proposed Stipulated Injunction fails to address these concerns.

IV. Failure to Examine the Impacts of Inert Ingredients

The CBD's initial complaint addressed the serious lack of information regarding the effects of so-called inert ingredients. Unfortunately this Proposed Stipulated Injunction completely fails to address the presence of inert ingredients within applied pesticides. Inert

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ingredients can be toxic, carcinogenic or mutagenic, yet the Proposed Stipulated Injunction does not address any consultation or analysis of pesticide formulations that include inert ingredients.

Any evaluation of the effects of pesticides on endangered species that does not look at the actual pesticides applied to species habitats will fail to fully examine such effects. Inert ingredients such as surfactants, for example, alter how a bird's feathers repel water, and can be high toxic to aquatic species, including delta smelt larvae. *See* California Dept. of Fish and Game Office of Spill Prevention and Response, *Acute Toxicities of Herbicides Used to Control Water Hyacinth and Brazilian Elodea on Larval Delta Smelt and Sacramento Splittail* (2004) Administrative Report 04-003, 4; *see also* Gary L. Diamond, Patrick R. Durbin, *Effects of Surfactants on the Toxicity of Glyphosate, with Specific Reference to RODEO* (1997).

Inert ingredients effect the manner in which pesticides degrade in the environment by altering their solubility, vulnerability to ultra-violet degradation, etc. Any consultation regarding the effects of pesticides on these endangered species is insufficient if it doesn't address the way these inert ingredients alter an active ingredient's interaction with the environment. The Proposed Stipulated Injunction should be revised to ensure that these factors are included within the consultation process.

IV. Conclusion

For all of the foregoing reasons, NCRA respectfully requests that the Proposed Stipulated Injunction be amended to include provisions and guidelines ensuring both the short- and long-term protection of the 11 endangered species considered. In order to ensure adequate protection of these species during the Section 7 consultation process the Proposed Stipulated Injunction should require consideration of (1) the impacts to the food and prey of the 11 species in question, (2) the potential for long-term chronic disease, (3) the effects to those portions of a population that are most vulnerable, (4) the rate of degradation of the pesticide, (5) the probability for continuous future use of the pesticide, (6) the secondary effects that may be caused by use of a toxic chemical, (7) the cumulative effects the pesticide will have on a species, and (8) the impacts of a pesticide formulation's inert ingredients on these species. Furthermore, the required consultation should be open to the public to further ensure that the consultation process has adequately protected these species from the damaging effects of pesticides.

Sincerely,

Stephan C. Volker (SLA)

Stephan C. Volker
Attorney for North Coast Rivers Alliance

SCV: sa ak

Comment Set S: Verbal Comments, July 14, 2009

Regular Meeting of the Board of Supervisors, Ventura County
July 14, 2009
Summary of Item 8: Public Comments
Regarding Giant Reed Removal

Speaker: Joseph Gilbert

Good morning. I didn't expect to be so soon called. Okay. I'm talking about the method of getting rid of the giant reed, of the *Arundo*, in the Matilija Canyon area and parts of Ojai. There is a chemical that is being used that has been defended by the makers of the chemical. It doesn't seem to be very wise or logical to rely on their own statements about the safety of the products that they benefit economically from. Your assessment of the safety of this product should be based on independent, scientific evidence. I looked on the internet regarding the safety of this stuff and there is a lot of disagreement about it. A lot of credible people can say that it is not safe. Whether you would like it to be safe has nothing to do with it. You have to look at the facts whether it actually is and don't take chances. There are 33 species in the Matilija Canyon area that are threatened. Using this substance in the area puts them further at risk. There could be other methods of getting rid of the cane. You could have a whole crew of people out there with hydraulic loppers cutting this stuff. There are companies that use the fiber for various products, paper, paper pulp, things like that. There could be a ground-breaking new use of this material instead of having it be a waste product. It could have some useful purpose. I say this stuff regrowing. This chemical, this Roundup or whatever it is called, this glyphosate, it doesn't work. Anyway, every year they have to put more of this stuff on it, it is expensive. So, even if it worked the first time it wouldn't be the best choice. So I would like you to seriously consider that your decisions have an effect on the environment and people, people who live in that canyon, that are adversely affected by these chemicals already. And you can think that this is psychological or whatever, but if it is psychological the effects are very profound and they need to be taken seriously. Whether it is not psychological, it hasn't been shown. So, that's it. Thanks.

S-1

S-2

Speaker: Dale Hodges

It's good to come on down. This is fun. So I'm going to read this because I'm not so good with this. It says this. I'm here to comment on the Upper San Antonio Creek Watershed Giant Reed Removal Project. From what I understand, the County intends to use a mixture of glyphosate and surfactant to remove *Arundo* up there in San Antonio as well as what we have already seen in Matilija Canyon. I've been farming organically for 35 years and I have extensive experience with what happens when we spray everything all the time. I used to have a farm in the San Joaquin and we used to have a saying, "Not a sign of life out there" because everything looked exactly the same. The higher you go, you look at the orange orchards and there is nothing growing under the trees at all because they have applied something that won't allow anything to grow except the orchard trees. That does get into the water, as I understand it. It is my understanding that the 1,200 pounds of glyphosate were poured into the Matilija watershed last year and the *Arundo* is growing back. There is no doubt about the fact that it is growing back, and there is not doubt that they have sold you that this glyphosate, that they know that it will come back and that is part of the plan. I urge you to consider that this is a treadmill that

S-3

S-4

Comment Set R: Verbal Comments, July 14, 2009, continued

Regular Meeting of the Board of Supervisors, Ventura County
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Regarding Giant Reed Removal

is going to go on for a long time. Apparently over six million pounds of pesticides are used in Ventura County last year. It is time for our county to get off the chemical treadmill. Pesticides are endangering the health of the planet as well as the next several generations of children. Around the world, people and politicians are asking questions, too. Studies in Sweden have linked exposures of glyphosate to hairy cell leukemia and non-Hodgkin's lymphoma. Another study has found higher incidence of Parkinson's disease amongst farmers who use the herbicides including glyphosate. How am I doing on time? Oh, I've got plenty of time. I'm going to hang out with this Edison guy, he's got it down with the clock. We're working it. We'll come back. Glyphosate causes a decrease in sperm count and is associated with a range of unhealthy reproductive effects in humans and other species. There is evidence linking glyphosate and herbicides containing glyphosate to cause a range of cell mutations and compromised DNA structure. These happenings are usually regarded as a precursor to cancer and birth defects. So, there are many symptoms of glyphosate poison and they all happen to line up with the flu, such as itching skin, blisters (hat doesn't sound like the flu, does it?), swollen eyes and face and runny nose, higher blood pressure and chest pains. That's what I have to say about that. I just find it ironic that in a moment of inspiration here, we were talking about a 100 percent increase in the unemployment in the Ojai valley. It just makes so much sense to take this stuff out with manual labor, intensive hand labor. We can take it out like that. It's not going to hurt anybody and we can utilize the roots of the *Arundo* for food. You are going to hear more about that from my friend Patty Pagaling here in a minute. I just find it incredibly ironic that we are going to pay these people to spray this stuff and we've got a whole bunch of people really willing to make a job of it and take it out. I think it would save some money. So, that's my professionally opinion and I'm sticking to it. Thanks for your time.

S-5

S-6

S-7

Speaker: Patty Pagaling

I have some information that I'd like to submit to you. So, I'm here also to comment on the Upper San Antonio Creek Watershed Giant Reed Removal Project. We really would like to encourage the County in creating a truly sustainable Ventura. On your website it states that the County of Ventura is committed to conducting business with environmental responsibility in the forefront. It's really time for us to work together to encourage everyone in Ventura County to use safe, non-toxic alternatives to herbicides and pesticides. In Ojai there is community support for manual removal and getting the community involved. We are very happy to hear about the city project headed up by Brian Holly to manually remove the invasive non-native species in Libbey Park creek area. And we as a community support non-toxic methods. Harvesting *Arundo* is in complete alignment with Obama's green jobs programs and will help new green industry. *Arundo* is a very useful plant and can be utilized for many purposes and products in the process of manual removal which would be 100 percent effective. *Arundo* has been found to make a good quality paper. The fiber from the stems can be used to create a viable alternative and what the paper pulp industry calls "tree-free" paper. It's a carbon-neutral paper that will stem the tide of the climate crisis. Because of the high yield of

S-8

S-9

Co Comment Set R: Verbal Comments, July 14, 2009, continued

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natural stands, the plant has been suggested as a source of biomass for energy production. There is a company in Florida, Biomass Investment Group, that is going into high gear using *Arundo* as biofuels. *Arundo* is used to make the reeds of clarinets and organ pipes. In Italy *Arundo* is used to make rare-like fabric. There are medicinal uses for *Arundo* and it is included in traditional medicinal formulation by Thane Pharmaceutical Enterprise, using the combinations of three reputed medicinal plants to promote a healthy urinary tract, including *Arundo*. *Arundo* also promotes genesis, which means it increases sperm count. Interestingly, glyphosate, I think it was mentioned before, causes a decrease in sperm count and is associated with a range of negative health impacts on the reproductive system of humans and other species. *Arundo* is also edible and can be used to make bread and other products. We as a community group would like to bid on the manual removal of the *Arundo* and we would like to work closely with the County to effectively remove the *Arundo* without toxic chemicals. What is the process that we need to go through to do this? Who should we talk to? We would like to arrange a meeting with the Ventura County officials to discuss the possibility. Also, I just wanted to mention that last, it was June 29th, a friend of mine was standing out on Matilija Canyon Road opening the gate for me, we were about to leave, a County truck, a Roundup truck, with a tank with the Roundup inside, came along and sprayed the side of the road while we were coming out of my driveway and she was standing right there and she got sick immediately and I got a headache and our eyes started burning. When she got home later on to Oregon she went to the emergency hospital and this is serious. We've got to stop these Roundup trucks just going along and spraying the sides of the roads, and there was no reason because when you look at the plants that are sprouting up and maybe standing there, if they are just going to kill them and they stand there dead and dry, what is the benefit of that? So we would really like to talk to the County about stopping that spraying of the sides of the roads, especially when someone is standing there. They have no awareness, obviously, that it would affect our eyes and our lungs and everything. Thank you.

S-9, cont.

S-10

S-11

S-12

S-13

Speaker: Arlene Gluckman

Good morning, Supervisors. I live in Ojai. I'm a long time Ojai resident. I'm also a certified building biologist and ecologist. I work for the Ojai Unified School District and I'm an operations coordinator for their Green Team. I'm an instructor for the International Institute of Building Biology and Ecology. And I'm a member of the Ojai Valley Green Coalition. I'm here today as an Ojai resident and an environmental consultant and a concerned citizen. Glyphosate is the main ingredient in Roundup. It's listed as a neurotoxin. It induces kidney damage and respirator effects. It's listed in the National Pesticide Communications Network Incident List as one of the top 25 incidents reported in 1998 for pesticides. As our concern for our drinking water rose, so should our concern of what went in our water. The Crop Watch News Service sponsored by the University of Nebraska states, "Preventing pesticide runoff in our waterways is of utmost importance to avoid contamination of our drinking water." U.S. Geological Surveys are finding up to 36 percent of water samples in streams and ponds and lakes contain

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glyphosate and up to 69 percent contained degradation products of glyphosate. It stays in our water. In a recent study, the University of Pittsburgh found the effects of Roundup exposure to three species of North American frogs. And this was published in the Journal of Ecological Applications. After one day, Roundup killed 68 to 80 percent of juveniles and after three weeks, killed 96 to 100 percent of frogs in the larval stage. Remember, when they are doing tests on products, it only takes a 50 percent mortality rate to label something as poisonous, warning with the scull and cross bones label. Another concern and effect of Roundup is inert ingredients. We have over 4,000 ingredients called inerts that are not tested by the EPA. And people think that inert ingredients are harmless. The reason that they are classified as inerts in an herbicide, like Roundup, is that they don't kill weeds, they don't kill insects. That doesn't mean they don't kill frogs or other aquatic life or people. It doesn't mean that it's safe for us. In a new study done at the University of France, published in the Environmental Health News this month, researchers found that the inert ingredients in Roundup, which make up 51 percent of Roundup by the way, amplified a toxic effect on human cells even a concentrations much more diluted than those used on farms and our lawns. This inert ingredient called Polyoxyethylene-alkylamine, or POEA, was found to be more deadly than the glyphosate itself, particularly killing embryonic placental and umbilical cord cells. In another study done on shrimp published in the archives of Environmental Contamination and Toxicology, POEA was found to be extremely toxic in low concentrations, killing almost all the shrimp. Recently a petition was filed with the Argentina Supreme Court seeking a ban on glyphosate after high incidents of birth defects and cancers on people living near crop spraying areas. I would just like to add that on page two of the Roundup label it states, "Do not apply directly to water, to areas where surface water is present, or to inter-tidal areas. Do not contaminate water when cleaning equipment or disposing of equipment wash waters." Thank you.

S-15, cont.

S-16

Speaker: Ms. Manson

Good morning. This is my first experience. Those people that have spoke, as far as I'm concerned, are a hard act to follow. And, I don't know about you, but I'm totally convinced. I was already convinced before I got here, but I'm totally convinced we absolutely have to do something in a big way to shift, to do things that are not poisoning us. A lot of the things that I was going to mention have already been mentioned. But there are a few that I wanted to address. One of them is the fact that the glyphosate is the third most common cause of pesticide illness in farm workers and it is the most common form of pesticide poisoning in landscape gardeners. This reminds me, by the way, of years ago when we had the issue of spraying the oranges with Malathion. You know, this is just all repeating itself. I'm a resident. I've lived in this county since 1969. So, anyway, some of these things have already been repeated. Another thing that stands out is that a study showed that with glyphosate, that the lettuce contained residues five months after the field was treated with this product. And that the lettuce seedlings were planted four months after the field was sprayed for weeds. The seedlings absorbed the glyphosate from the soil residues. And then they go on to talk about the World Health

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Organization did a study whereby they found the residues of Roundup in the wheat after harvest and the milling does not remove it. It's not removed either by cooking, it doesn't break it down. And also what they discovered as far as environmental effects is that 50 to 80 percent of beneficial insects are killed from the exposure to the residues of the glyphosate herbicide. I want to…as I was reading all of this material myself, it became very evident to me that what we are doing with nature is not any different than what we have already done with ourselves, and that is man has totally overused antibiotics and other forms of medicine and created a lot of problems for himself. And he's now willing to perpetuate that onto nature. So I see us as we are going to become the endangered species. And I say that it is time for us to lay down our ignorance and get in touch with the events, grief, we will all experience if we continue plowing poisons into our fields while reaching down the road of self destruction. As far as I'm concerned, my last thing that I noticed when I read all this, was what came to mind was read it and weep. Because it really is something to weep about and it will get worse if we don't change. Thank you. **S-17, cont.**

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Speaker: Patty Pagaling

I'm here again to comment on the *Arundo* removal project. And our group is in the process of putting together a cost analysis and we are asking for a time extension here. We understand that tomorrow is the final comment day for the project, that the comments are supposed to be in to Pam Lindsey by, or postmarked by July 22. A lot of people in the community didn't know about the project. So if we could have until September for people to be aware and send in their comments we'd really appreciate that. Also, that would give us more time to put our proposal together. I was researching online some information, some specific information about what the County has put together as far as a budget and what's available for this year. I haven't been able to find that. So, perhaps you can help me or I know I did call Watershed District's office and wasn't able to get through to someone. I know Pam Lindsey's really busy. So, we can talk to you more about the details if we need to in your office soon. Thank you. T-1

Speaker: Dale Hodges

Hello. Thank you again for your time. Public comment Tuesday is what I am going to call this day. So I'm here again to speak on behalf of our ecosystem, the same one that we share with millions of people around the world. Agribusiness in our county has plenty of representation. We appreciate your consideration of our growing voting block, despite our operations budget of zero. First, I must mention the Watershed Protection staff's stellar service and response times. I've spoken to them a couple of times on the phone, I've left messages and they've gotten back within hours. It's uplifting and it's making my little chore here a lot easier. I'm very inspired by these people. I've only got a couple of minutes and 18 seconds left. Sincerely, these folks have a considerable grasp on decisions that will affect our lands for many generations. Their testimony and attendance to details is critical. I understand that we can't afford to monitor our oceans anymore. We are not testing the ocean waters for pollutants and pathogens. So these people are a key ingredient in establishing a living ecosystem along the coast. My personal opinion is that we are not necessarily overfishing our waters, but that we are discharging a lot of nitrates into the ocean and making it really hard for the fish to live and exist. So that is why I give it the ecosystem context. Of course, I also believe that the ocean is connected to the mountains and the streams and the waters and all that. I understand that we cannot afford enough monitoring, establishing an ecosystem being the key to teaching our children of our interconnectedness to the sea and the mountains to school playgrounds. I am here to remind you that we can no longer afford to segregate ourselves, our economy, or our ecology from the rest of the world based upon our intentions. Minimizing the pollutants that we introduce to this jewel of our environment will be a challenge for all future food production and lifestyle considerations into our foreseeable future. Please allow me to read what you have in your system about *Arundo* removal. It's the result of a test plot near Casitas Springs. It's likely to take seven years T-2

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since the site was decimated by floods after just one month, it is not clear if the study can be considered a complete resource. I am available to your staff for any other research and solutions that we might be able to find for this. Now, just let me turn off my computer. It's okay, we'll get over that. What I read, is that the whole test plot is decimated by the floods after just one month. And given that, I don't think that we can consider the tests that were done around this *Arundo* viable. Again, as I said, it was slated for seven years and it just got wiped off the map after one month. That's about it. Thanks. **T-2, cont.**

Responses to Comments Received on the Draft Mitigated Negative Declaration and Initial Study

Global Response Number 1: Herbicide Use

Many non-native plant eradication programs rely heavily or solely on herbicide applications, as this technique often is the most efficient and cost-effective means of removal, especially when the target plant population is large (e.g., spatially extensive). While the benefits of herbicide applications for large-scale eradication programs in terms of effectiveness and cost are straightforward, it is acknowledged that there are also risks associated with the use of chemical herbicides. There is a very large body of literature that addresses the toxicity and risks of herbicides, including glyphosate-based herbicides; it is noted, however, that the manufacturers of these products have not prepared the majority of these publications. Although these studies acknowledge the human and environmental risks of herbicide use, there are substantial differences between these risks at a product-specific level.

Overall, it is accepted that when using herbicides, it is desirable to choose a product that has low toxicity, will not move from its target or leach into groundwater (low water solubility), and will not remain in the environment for a long period of time (low persistence). Furthermore, the application method selected is important, as are site-specific physical and climatic conditions. To this end, the VCWPD proposes to use a glyphosate-based herbicide known as Aquamaster®. Aquamaster® does not contain polyethoxylated tallow amine (POEA), which is a surfactant harmful to aquatic life and is found in Roundup®, the better-known glyphosate-based herbicide. Aquamaster® is approved for aquatic use by the U.S. Environmental Protection Agency (USEPA), largely because it lacks surfactants harmful to aquatic life. As addressed in Initial Study Section A.7.4 (Proposed Project), the VCWPD additionally proposes to use Agri-Dex® and/or Activator 90® as a surfactant; both of these products are also approved by the USEPA for aquatic use. ***Roundup® is not approved for aquatic applications, and is not proposed for use as part of the Upper San Antonio Creek Watershed Giant Reed Removal Project.***

As addressed in Initial Study Section B.21 (Public Health), toxicological tests show that while glyphosate is highly toxic to plants, it is largely non-toxic to humans and animals. Glyphosate is essentially indigestible to humans and animals and is excreted essentially in an unmetabolized form. The USEPA has determined that glyphosate is non-carcinogenic to humans, and additional research has found no evidence that glyphosate is either a direct neurotoxin or an endocrine disruptor. Glyphosate is a non-selective herbicide that readily and completely biodegrades in the soil, and has little potential for leaching into groundwater. The half-life of glyphosate can range between three to 130 days, depending on site-specific soil structure, moisture and temperature. Its half-life in water is estimated to range from a few to 63 days, depending on site-specific conditions and project-specific application rates. Based on its water solubility, glyphosate does not substantially bioconcentrate in aquatic organisms and is minimally retained and rapidly eliminated by fish, birds, and mammals.

The VCWPD has received two medical journal articles cited by concerned citizens and has reviewed them. It is noted, however, that VCWPD staff are not medical experts, and cannot comment on the validity of the methods used. Below is a summary of the VCWPD's review of these two articles.

1. *Glyphosate Formulations Induce Apoptosis and Necrosis in Human Umbilical, Embryonic, and Placental Cells*. (Written by Nora Benachour and Gille-Eric Seralini. Chemical Research in Toxicology. 2009. 22, pp. 97-105).

This article was written by French medical professionals at the University of Caen. The purpose of the study was to test Roundup® formulations and the individual active ingredients on lines of human cells grown in a laboratory. Cells were exposed to diluted products for 24 hours, and then cell death was measured. The Roundup® formulations that were tested are not available in California, and, as noted above, Roundup® would not be used during the proposed project. As such, only those tests involving glyphosate were evaluated by the VCWPD. The VCWPD did not test for the glyphosate metabolite aminomethylphosphonic acid (also known as AMPA) in its water quality testing for the Matilija Dam Ecosystem Restoration Project Giant Reed Removal Project.

The authors of the article found four (4) to ten (10) parts per million (ppm) of glyphosate is nontoxic to the subject laboratory cells. Toxicity begins at about one (1) percent, or 10,000 ppm. Glyphosate induces mitochondrial toxicity without cell membrane damage. The glyphosate metabolite AMPA destroys the cell membrane, but it was unclear at what concentration. The authors state AMPA is more toxic than glyphosate and is more stable in soil and plants as residues. However, the authors then further explain that AMPA is not toxic alone at the concentrations used in their experiments, but in combination with glyphosate and POEA (the surfactant in Roundup®) toxicity is amplified. Again, it was unclear at what concentrations these combined materials were considered toxic.

In response to this article, the VCWPD has compared the concentrations of glyphosate used in the French tests to its detection ability for the Matilija Dam Ecosystem Restoration Project Giant Reed Removal Project. The VCWPD's two years (September 2007 through August 2009) of water quality testing did not detect glyphosate in surface water, ground water, soil or giant reed chips in the work area. The laboratory used by the VCWPD can detect glyphosate at 0.02 milligrams per liter (mg/L) (0.02 ppm/0.00002 percent) or greater. The Office of Environmental Health Hazard Assessment set the Public Health Goal for glyphosate in drinking water at 0.9 ppm in 2007, and the California Department of Health Services set the Maximum Contaminant Level for drinking water at 0.7 ppm (0.00007 percent). The European Drinking Water directive limits any pesticide in drinking water to less than 0.0001ppm (0.1 parts per billion [ppb]).

As noted previously, the study found glyphosate to be toxic to laboratory cells beginning at one (1) percent concentration. They also stated that four (4) to ten (10) ppm glyphosate was non-toxic. The VCWPD's water quality sampling can detect glyphosate to 0.02 ppm, much lower than the toxicity level found in the study. Since none of the water quality sampling conducted for the Matilija Dam Ecosystem Restoration Project Giant Reed Removal Project detected glyphosate, the VCWPD can reasonably conclude that any field levels are lower than the toxic levels determined in the study for the laboratory conditions.

2. *Pesticide exposure as risk factor for non-Hodgkin lymphoma including histopathological subgroup analysis*. (Written by Mikael Ericksson, Lennart hardell, Michael Carlberg, and Mans Akerman. International Journal of Cancer. 2008. 123, pp. 1657-1663).

This Swedish study interviewed 910 participants with non-Hodgkin lymphoma regarding exposures to pesticides, including glyphosate. They also interviewed a control group in the general population that did not have the disease. Data were collected between December 1, 1999 and April 30, 2002. No physical testing was conducted, except as needed to differentiate

the sub-types of cancer. Most of the people interviewed were between 58 and 62 years of age. They found 29 cancer patients and 18 people in the control group had been exposed to glyphosate. The odds ratio for glyphosate exposure as a contributor to this cancer type was determined to be 2.02. This means people in the cancer group were twice as likely to have been exposed to glyphosate as people in the control group.

The VCWPD's response to this article is limited. The study asked cancer patients about their exposure to many chemical products. It is the opinion of the VCWPD that many exposures to chemicals are not known, unless a person works in handling chemicals on a daily or periodic basis. Further, the study acknowledges it failed to ask if protective gear was used by any study participants during an exposure. With glyphosate being one of the most commonly used pesticides world-wide, it would be difficult for anyone to quantify their true exposure levels.

As addressed in Initial Study Section A.7 (Project Description), no herbicide would be applied to surface water, and the same restrictions on foliar applications that were used for the Matilija Ecosystem Restoration Giant Reed Removal Project would be enforced for the proposed project. No foliar application would occur when targeted giant reed is within:

- 25 feet of any surface water;
- 25 feet of any road;
- 50 feet of any orchard/agricultural crop; and,
- 200 feet of any structure (home, outbuilding).

Only a "cut and daub" application method would be used for the circumstances listed above to avoid potential spray drift into these areas and to reduce standing dead biomass, which could become a fire hazard. It is estimated that only about five percent or less of the targeted giant reed would be controlled using a foliar spray treatment, and this treatment would typically be applied only to those stands of giant reed that have a cover of 20 percent or more (please see Initial Study Section A.7.4 [Proposed Project]). Under the proposed project, all herbicide applications would comply with all applicable regulations and specifications set forth by the USEPA, the California Department of Pesticide Regulation, Ventura County Agricultural Commissioner, the Ventura County Environmental Health Division and the mitigation measures and protocols presented in the proposed project's Mitigated Negative Declaration and its supporting Initial Study.

Global Response Number 2: Giant Reed Removal Alternatives and Considerations

The following provides a description of the various methods available for giant reed removal that have been evaluated by the VCWPD, as well as the regulatory approval and cost considerations that must be factored into the decision as to which removal method (alternative) to choose for implementation.

Cut and Daub Application. This is also known as the "cut-stump" method. Mechanical removal of the giant reed canes is immediately followed by the painting of the cut stumps with a glyphosate-based herbicide at full strength. This method substantially reduces the amount of resprouting cane and thus reduces the costs and amount of herbicide used for re-treatments (please refer to Global Response Number 4, below, for additional information on re-treatments). No ground disturbance is needed with this method; therefore, it is readily permitted by regulatory agencies, as discussed in the "Regulatory Permit Requirements and Considerations" section of this response.

Foliar Spray Application. Under this method, giant reed canes are sprayed with a diluted (six [6] to eight [8] percent product) solution of glyphosate-based herbicide and the standing canes are left to die.

In very dense stands, the dead canes can be cut and removed or shredded in place to reduce fire hazards (at extra cost). A non-ionic surfactant (approved for aquatic use) is mixed with the glyphosate. This method is very effective and reduces the amount of resprouting canes. Like the cut and daub method, no ground disturbance occurs; as such, it is readily permitted by regulatory agencies.

Cane Biomass Removal. Under this method, standing giant reed cane is cut and removed without an herbicide application. Resprouting cane is then treated by foliar spray when the canes reach about four feet in height. Although not evaluated during the Ventura River Arundo Removal Demonstration Project, the VCWPD has found, through review of other projects, that the number and frequency of foliar treatments of resprouting cane is far greater than the foliar spray and cut and daub methods, thereby substantially increasing re-treatment costs.

Hand Removal of All Biomass. Under this method, all standing giant reed cane and rhizome material is removed with hand tools, including the use of hand-held pneumatic air hammers powered by generators, as well as shovels, picks, and digging bars. This method is best suited for isolated patches of giant cane in sandy soils because the rhizomes can be easily excavated and sifted out of the substrate. This method is difficult if the rhizomes are intermingled with large cobble, native tree roots and other vegetation. Substantial soil disturbance occurs and it is hard to predict the depth and width of the rhizome mass. The deeper the mass, the larger the excavation pit and spoil pile will be. The rhizomes in the Ventura River Arundo Removal Demonstration Project work area were about 261 square feet of giant reed cover, with rhizomes about three feet deep. Removal of the above-ground cane biomass and the 29 cubic yards of rhizomes required 42.5 labor hours, or about 0.7 hours per yard, not including staging, loading, hauling, chipping/disposal, breaks or other time on site. For the proposed project's estimated 13 acres of giant reed cover, assuming the rhizomes are an average of three feet deep, approximately 62,920 cubic yards of below ground material would be encountered. Labor hours would be approximately 44,044, or about 21 years, for one person at 40 hours per week. Conversely, a crew of 21 people would require a year to conduct the work, not including staging, loading, hauling, chipping/disposal and other time on site.

The substrates in the narrow creeks of the proposed project are mostly cobble, with some boulders. Specific to this example, the approximate 13 acres of giant reed is patchy, and it is often intermingled with native trees and other vegetation. Therefore, hand removal of giant reed cane and rhizomes causes more than 13 acres of soil disturbance in the bed and on the banks of the subject creeks to accommodate the excavation and spoil work areas. Furthermore, hand removal work in a cobble and boulder substrate intertwined with tree roots de-stabilizes the channel and harms native vegetation.

Giant reed cane can be chipped into small pieces and used for landscaping mulch with a small likelihood of resprouting. However, even very small parts of rhizomes will readily sprout roots and stems, so they would have to be fully collected and destroyed by incineration or other treatment. Like all other methods, this method also requires monitoring and additional re-treatments (hand removal) for a minimum of five years to ensure all viable rhizomes have been removed.

Tarping. This method was not tested during the Ventura River Arundo Removal Demonstration Project, but was considered during development of the Matilija Ecosystem Restoration Giant Reed Removal Project. It involves the hand removal of the giant reed canes followed by tarping. The VCWPD found, through research, that tarping is not a viable option for a large project area. Thick, opaque plastic tarps are placed over the rhizome mass after the canes are cut off. The resprouting cane is deprived of light and eventually the rhizomes starve. Maintenance of the tarp is labor intensive because it must occur every few weeks for at least several years. The new shoots lift the tarp and must be frequently cut. The tarps are easily torn and disturbed by animals, winds and flooding such that

frequent replacement is needed. Regulatory agencies usually only approve this method if the tarps are deployed outside the active stream channel because they are hazardous to aquatic life, especially if they wash downstream.

Alternative Chemical Products. The VCWPD has also looked into alternative chemical products. Two years ago, just before work began on the Matilija Ecosystem Restoration Giant Reed Removal Project, Ms. Pagaling, a concerned citizen, suggested the use of orange oil as an herbicide. Although this is a natural product, it is very harmful to aquatic life and does not effectively kill giant reed.

Regulatory Permit Requirements and Considerations. Permitting by regulatory agencies is problematic for the hand or mechanical removal of the rhizomes. The U.S. Army Corps of Engineers (USACE) can only authorize the "Least Damaging Practicable Alternative" (LDPA) for a project. In a conversation between VCWPD Project Manager Pam Lindsey and Mr. Antal Szijj of the USACE Ventura Regulatory office on July 21, 2009, Mr. Szijj stated that the excavation and removal of the giant reed rhizomes to achieve the goal of giant reed removal fails the LDPA test. The herbicide use, as long as precautions are taken to avoid impacts to water quality, has less impact than the resultant erosion and turbidity caused by rhizome excavation. Regional General Permit Number 41 (please refer to Initial Study Section A.9 [Other Agencies Whose Approval May Be Required]) allows for the excavation of non-native plant material, but prohibits any activities resulting in channel destabilization. Excavation of rhizomes in many of the proposed project's work areas would destabilize creek banks, resulting in erosion and turbidity impacts. Rhizomes left in place to degrade are usually colonized by native plants, whose roots help protect the bank.

The California Department of Fish and Game (CDFG) generally concurs with the USACE's analysis and has approved the removal of giant reed in 1,100 acres of Matilija Creek and the Ventura River, where glyphosate has been the key tool in giant reed control. Additionally, the CDFG has expressed support of the proposed project (please refer to comment letter B) with some additional suggestions for environmental protection. These suggestions have been further discussed with the CDFG and subsequently incorporated into the proposed project, as agreed upon, to further safe-guard the public and environment from herbicide applications and potential risks of upset.

In addition to the above, the State Water Resources Control Board regulates, through the issuance of a General Permit, the use of aquatically approved glyphosate-based products in California streams as long as best management practices (BMPs) and water quality standards are implemented. As noted in Global Response Number 4, the VCWPD has not detected any glyphosate in the surface water, ground water, soil or giant reed chip samples collected and analyzed for the Matilija Ecosystem Restoration Giant Reed Removal Project. As such, the VCWPD's proposed giant reed eradication methods for the Upper San Antonio Creek Watershed Giant Reed Removal Project would not be anticipated to result in impacts to water quality.

Cost Considerations. As part of the Ventura River Arundo Removal Demonstration Project, the VCWPD compared the costs and efficacy of four giant reed eradication methods. A summary of the cost comparison is provided in Table 1, below. As mentioned by Mr. Dale Hodges on July 21st (please refer to verbal comments and responses to comments set T), the Ventura River Arundo Removal Demonstration Project was cut short by catastrophic flooding and scour damage. Nevertheless, the VCWPD believes that the cost data for initial treatment/removal, as presented in Table 1, remains valid, although long-term re-treatment and monitoring cost data was not analyzed. In general, costs for any given giant reed removal project will vary based on access distances. Removal areas near roads are less expensive than those where extensive hiking or road-building are needed.

Table 1. Estimated Giant Reed Removal Costs By Removal Method

Removal Method	Cost Per Acre
Cut and Daub Method	$29, 431
Foliar Spray Method	$19,882
Cane Biomass Removal Method	$18,903
Hand Removal of Cane and Rhizomes Method (No Herbicide Application)	$579,000

The VCWPD knows from its own project experience, and review of other giant reed removal projects, that the cut and daub and foliar spray methods are the most effective to reduce the volume of resprouting cane and the need for re-treatments, although follow up for five years is usually needed for all methods. Based on the Ventura River Arundo Removal Demonstration Project, the cut and daub, foliar spray and Cane Biomass Removal methods are similar in cost (2004 dollars), and range between $20,000 and $30,000 per acre. Hand removal of giant reed cane and rhizomes is substantially more expensive to conduct than the other methods. Given the cost analysis for initial treatment, hand removal methods have not been, for the VCWPD, a viable choice for giant reed removal. The costs are approximately 20 times more than the other methods, at an estimated $579,000 per acre. In addition, and as outlined above, regulatory permits are not available for the hand removal method within natural stream courses.

In summary, the VCWPD agrees with the public that whenever possible, it is best to use alternatives to chemical herbicides when environmental impacts are minimized. However, in this case, using the glyphosate-based chemical minimizes numerous environmental impacts due to the lack of any sub-surface disturbances and, in comparison to the hand removal of biomass method, requires a much smaller work force for a much shorter period of time, thereby reducing potential impacts related to such issues as traffic, noise and air quality.

Global Response Number 3: Project Funding and Schedule Constraints

As addressed in Initial Study Section A.7.1 (Project Background), the proposed project is part of an Integrated Regional Water Management Planning Program (IRWMP) Proposition 50 Grant (Grant) received by the Watersheds Coalition of Ventura County; the proposed project is not funded by tax dollars. The Grant has a finite schedule, which compresses the amount of time usually required for giant reed removal projects. Five years of re-treatments is standard; however, the Grant allows for only two years of re-treatments even if the VCWPD receives a recently requested Grant extension.

The original schedule for the proposed project's implementation was September 2009. However, on the VCWPD's current trajectory, the proposed project's California Environmental Quality Act (CEQA) review and approval process and regulatory permitting will be complete in late September 2009. The contractor bid process then takes approximately two months, with construction (e.g., removal activities) beginning within about 30 days. This schedule places implementation of the proposed project in the middle of the winter rainy season. Although there are typically enough dry consecutive days to conduct this type of work even during this period, under the revised schedule initial implementation of the proposed project will take longer than if it had been able to start in the early fall. Six re-treatments, which are critical to the proposed project's long-term success, can then occur within the Grant window: three re-treatments in 2010; and, three re-treatments in 2011.

Delays, even for several weeks, in finishing the proposed project's CEQA review process and beginning the contractor bid process could jeopardize project implementation for an entire year. The bird nesting season begins in March and ends in late August. This period would be "off limits" for the initial treatment work to avoid potential impacts to native nesting bird species. Work would thus begin

in the fall of 2010, with only three or four re-treatments in 2011, thereby compromising the long-term viability of the project.

Under the proposed project, implementation of the hand removal method would require the preparation of a new environmental review document under CEQA, and it is possible that the level of earth disturbance required for hand removal could trigger the need to prepare an Environmental Impact Report (EIR) to address potentially significant and adverse impacts to water resources, biological resources, cultural resources, hydraulic hazards, soils, and flood control and drainage. Preparation of a second Mitigated Negative Declaration and supporting Initial Study, including its public and agency review and comment process, would require a minimum of six to nine months and could, perhaps, take more than one year to complete. Preparation of an EIR, including its public and agency review process, would likely take eighteen months to upwards of two years to complete. Under either scenario, full implementation of the proposed project, including its follow-up re-treatments, would not be feasible under the Grant's timeframe for completion. Consequently, it is likely that the VCWPD would not pursue the proposed project any further if the hand removal method was to be identified by decision makers for implementation.

Global Response Number 4: Herbicide Re-treatments, Native Plant Re-establishment, and Water Quality Monitoring and Testing

As noted in Initial Study Section A.7 (Project Background), giant reed is a non-native, highly invasive plant that requires human intervention to remove. Regardless of the removal method chosen, due to the expansive rhizome systems established by giant reed, in conjunction with its extreme persistence, it cannot be fully eradicated within the context of a single removal effort; follow-up monitoring and re-treatment (or re-removal, if done by hand) is necessary. To ensure its full eradication, monitoring and re-treatment (or re-removal) ideally continues for at least five years or longer. However, when using herbicide applications, progressively less herbicide is needed as the total volume of re-sprouting giant reed declines.

Herbicide Applications. The Matilija Dam Ecosystem Restoration Project Giant Reed Removal Project was initiated in August 2007. Since its inception, approximately 3,105 gallons of Aquamaster® have been used for giant reed treatments; Table 2 provides the estimated amount of Aquamaster® used for the initial treatment and subsequent re-treatments to date.

Table 2. Matilija Dam Ecosystem Restoration Project Giant Reed Removal Project: Estimated Use of Aquamaster®

Treatment/Re-treatment	Amount of Aquamaster® Applied (In Gallons)
Initial Treatment and 1st Re-treatment	2,372
2nd Re-treatment	420
3rd Re-treatment	197
4th Re-treatment	66
5th Re-treatment	50

As demonstrated in Table 2, the total volume of herbicide required for re-treatments significantly declines as the amount of giant reed reemergence declines. Once fully eradicated, no re-treatments are needed.

The proposed Upper San Antonio Creek Watershed Giant Reed Removal Project would involve an initial herbicide treatment in fall 2009, three re-treatments in 2010, and three re-treatments in 2011. The amount of Aquamaster® required for the initial treatment and six re-treatments for the proposed project using the cut and daub method is estimated to be approximately 900 gallons.

Native Plant Re-establishment. The Matilija Dam Ecosystem Restoration Project Giant Reed Removal Project has not involved any re-planting with native plants. Based upon monitoring to date, the areas made available from giant reed removal have been sufficient to allow for successful native-plant re-establishment. The same is fully expected for the Upper San Antonio Creek Watershed Giant Reed Removal Project.

Water Quality Monitoring and Testing Program. Implementation of the Matilija Dam Ecosystem Restoration Project Giant Reed Removal Project has included a water quality monitoring and testing program. The program was initiated prior to any giant reed removal activity on August 2, 2007. Six routine sampling sites were established in the project area. Additionally, the program has included collection at random sample locations when the contractor is working near surface water. The contractor is not notified when or where these samples will be taken.

Between August 2, 2007 and June 19, 2008, 58 routine and 14 random water quality samples were taken. All samples were analyzed at a California Environmental Protection Agency accredited laboratory for glyphosate and non-ionic surfactants. As of June 2008, no glyphosate had been found in any of the samples taken. These results are documented in the Matilija Dam Giant Reed Removal Project Water Quality Monitoring Summary – August 2007 to June 2008 report which is publically available at http://www.matilijadam.org. As of August 2009, the water quality monitoring and testing program summary report for July 2008 through August 2009 is pending receipt of the August sampling results and has not yet been finalized. However, based upon testing results provided to the VCWPD to date for this period, no glyphosate has been detected.

As with the Matilija Dam Ecosystem Restoration Project Giant Reed Removal Project, a Water Quality Monitoring Plan would be prepared and implemented for the Upper San Antonio Creek Watershed Giant Reed Removal Project, samples and testing would be taken prior to, during and following the initial treatment, as well as re-treatments. Should any test results indicate that project related activities are not in compliance with both manufacturer and USEPA recommendations for Aquamaster® use, corrective measures would be taken immediately.

Comment Letter A
Governor's Office of Planning and Research, State Clearinghouse Division

A-1 Comment noted. Independently of the State Clearinghouse, the VCWPD has received comment letters from the: California Department of Fish and Game (CDFG) (comment letter B); California Department of Transportation (CalTrans) (comment letter C); the Ventura County General Services Agency, Parks Department (comment letter D); Ventura County Public Works Agency, Integrated Waste Management Division (comment letter E); and, Ventura County Air Pollution Control District (comment letter F). Responses to these comments are provided below. No other federal, State or local regulatory agencies have provided written or verbal comments directly to the VCWPD.

Comment Letter B
California Department of Fish and Game

B-1 Comment noted. The VCWPD looks forward to working with the CDFG to minimize impacts to fish and wildlife species per the stressors indicated.

B-2 Comment noted. The VCWPD appreciates the CDFG's recognition of its efforts on the proposed project.

B-3 Comment noted. As referenced throughout the proposed project's Initial Study and Mitigated Negative Declaration, the VCWPD would follow all USEPA and manufacturer label specification rates and application techniques. As such, implementation of the proposed project would not result in significant and adverse impacts to non-target species, as outlined in Initial Study Section B.6 (Biological Resources).

B-4 Comment noted. The VCWPD has been in contact with the CDFG and it has been agreed that foliar spray treatments would be prohibited within 25 feet of surface water. Additionally, Mitigation Measure B-2 has been augmented to require that all work crews be provided with (and trained in the use of) spill cleanup kits, as well as the contact information for the CDFG's Office of Spill Prevention and Response. The Initial Study and Mitigated Negative Declaration have been revised to reflect these changes.

B-5 Comment noted. Please see response to comment B-4, above. Foliar spray treatments will be prohibited within 25 feet of surface water. The Initial Study and Mitigated Negative Declaration have been revised to reflect this change.

B-6 Comment noted. Mitigation Measure B-1, as presented in both the Initial Study and Mitigated Negative Declaration, has been revised to include the suggested recommendations.

B-7 Comment noted. The VCWPD concurs that long-term monitoring with remotely sensed data past the year 2012 would be beneficial, as would the removal of any re-infestations as part of the VCWPD's maintenance program. However, as noted in Initial Study Section A.7.1 (Project Background), the proposed project is being funded by an Integrated Regional Water Management Planning Program (IRWMP) Proposition 50 grant; it is not part of the VCWPD's existing operating budget, as approved by the Ventura County Board of Supervisors. As such, implementation of these suggestions would be contingent upon securing the funding needed, which cannot be reasonably predicted at this time.

B-8 Comment noted. The VCWPD submitted a Section 1602 permit application package for the Upper San Antonio Creek Watershed Giant Reed Removal Project to the CDFG on July 24, 2009. No giant reed removal activities would occur prior to receipt of the CDFG's approval.

Comment Letter C
California Department of Transportation

C-1 Comment noted. The VCWPD concurs that the proposed project would be beneficial to the Upper San Antonio Creek Watershed, and that the removal of giant reed would reduce debris in the subject creek, thereby reducing flood hazards at the referenced State Route 150 bridges.

C-2 Comment noted. The VCWPD will coordinate with the California Department of Transportation further to discuss the referenced encroachment permit. The required encroachment permit has been added to Initial Study Section A.9 (Other Agencies Whose Approval May Be Required).

C-3 Comment noted. As depicted in Initial Study Figures A.4-1 (Proposed Project Area) and A.7-1 (Giant Reed Percent Coverage and Distribution), no giant reed has been identified for removal within the immediate vicinity of McNell and Upper San Antonio Creeks where they cross under the referenced bridge replacement project, although giant reed targeted for removal does occur near Thacher Creek's undercrossing of State Route 150. Should the VCWPD identify giant reed removal in the vicinity of the referenced bridge replacement project, it will coordinate further with California Department of Transportation's Division of Environmental Planning to ensure that no conflicts with landscaping occur.

Comment Letter D
Ventura County General Services Agency
Parks Department

D-1 Comment noted. The "amp" referenced in comment D-1 is a map of the proposed staging and chipping area in Soule Park, which has been incorporated into to the proposed project's plan specification sheets. The Monitoring Action for Mitigation Measure R-1, as presented in Appendix A of the Mitigated Negative Declaration, has been modified to reflect the suggested revision.

D-2 Comment noted. The Monitoring Action for Mitigation Measure R-2, as presented in Appendix A of the Mitigated Negative Declaration, has been modified to reflect the suggested revision.

D-3 Comment noted. The acreage of the proposed staging and chipping area has been revised to reflect the map referenced in response to comment D-1 in both the Initial Study and Mitigated Negative Declaration. As revised, the proposed chipping and staging area is an estimated 1.25 acres in size.

D-4 Comment noted. Please see response to comment D-3.

Comment Letter E
Ventura County Public Works Agency
Integrated Waste Management Division

E-1 Comment noted. Initial Study Section B.24 (Waste Treatment/Disposal), Item D (Solid Waste Facilities), has been revised to reflect a finding of less than significant; this modification has additionally been made in the Initial Study Checklist (Item 24.D [Solid Waste Facilities]), found at the end of Initial Study Section A. Please note that Initial Study Section B.24 (Waste Treatment/Disposal), Item C (Solid Waste Management), concludes that the proposed project's impacts to solid waste management would be less than significant.

E-2 Comment noted. The VCWPD would comply, to the extent practicable, with Ventura County Ordinance Numbers 4308 (solid waste handling, disposal, waste reduction, waste diversion) and 4357 (requirements for the diversion of construction and demolition debris from landfills by recycling, reuse, salvage) to assist with and support Ventura County's efforts to meet the requirements of Assembly Bill 939 (AB 939).

E-3 Comment noted. The proposed project would involve the removal of giant reed and castor bean and would not generate an appreciable amount of construction-related material. However, assuming implementation of the proposed project, the VCWPD would require, by contract specifications, that all recyclable construction materials generated be recycled at a permitted recycling facility and that all non-recyclable materials will be disposed of at a permitted disposal facility as part of its contract specifications.

As related to green material recycling and reuse, with the exception of castor bean seed head, all removed plant material would be chipped and used by the Ventura County Parks Department for mulch, trail cover, or other uses (please refer to Initial Study Section A.7.4 [Proposed Project]). However, assuming implementation of the proposed project, the VCWPD would require that all plant material that cannot be reused be transported to an authorized or permitted greenwaste facility as part of its contract specifications. It is understood that the illegal disposal and landfilling of recyclable organic material is prohibited, and this, too, would be made explicit in the proposed project's contact specifications.

The proposed project does not involve any earth disturbing activities. As such, no excavated soil or sediment would be generated that would require reuse or recycling. However, the VCWPD acknowledges that the illegal disposal or landfilling of recyclable soil or sediment is prohibited.

It is standard practice for the VCWPD to require, by contract specifications, that all contractors provide documentation of how much construction-related material was disposed of and/or recycled. This requirement includes submittal of all receipts from the landfill(s) and/or recycling facilities that accept the material. By contract specifications, the VCWPD would require that the contractor provide the summary table requested for submittal to the Integrated Waste Management Division.

Comment Letter F
Ventura County Air Pollution Control District

F-1 Comment noted. Mitigation Measure AQ-4 requires that all construction and site preparation activities be conducted in compliance with all applicable Ventura County Air Pollution Control District Rules and Regulations, with emphasis on Rules 50 (Opacity), 51 (Nuisance) and 55 (Fugitive Dust).

Comment Letter G
Meredith Clement, Kennedy/Jenks Consultants

G-1 Comment noted. The State Water Regional Control Board's (SWRCB's) logo and the suggested text have been included on the cover sheets of both the Mitigated Negative Declaration and its supporting Initial Study.

Comment Letter H
Ms. Estelle Foster

H-1 The VCWPD appreciates the comments and concerns expressed in this correspondence. Please refer to Global Response Numbers 1, 2 and 3 for the VCWPD's full response to this comment.

Comment Letter I
Ms. Judith Elliott

I-1 The VCWPD appreciates the concerns expressed in this correspondence. Please refer to Global Response Number 1 for the VCWPD's full response to this comment.

I-2 As addressed in Global Response Number 2, the proposed project is, economically, considered one of the most cost effective methods of giant reed removal. Additionally, as addressed in Global Response Number 4, Table 2, progressively less herbicide is required during re-treatments; therefore, progressively less funding for herbicide purchases would be needed. As addressed in Initial Study Section B.2B (Housing), the workforce required for implementation of the proposed project would be expected to be drawn from the Ventura County existing employment base, and thus the proposed project would temporarily benefit local employment.

I-3 As addressed in Global Response Number 3, the proposed project would not be funded with tax dollars and thus would not affect any existing federal, State or local funding allocated for health care programs. Please refer to Global Response Numbers 1 and 2 for the VCWPD's full response to this comment.

Comment Letter J
Ms. Sharon Monet

J-1 The VCWPD appreciates the concerns expressed in this correspondence. Please refer to Global Response Numbers 1 and 2 for the VCWPD's full response to this comment.

Comment Letter K
Dr. Robin Bernhoft

K-1 The VCWPD appreciates the suggestion presented in this comment. As addressed in Global Response Number 2, the VCWPD has evaluated several alternatives for the removal of giant reed, and has concluded that the proposed methods of eradication are the least environmentally damaging. Please refer to Global Response Number 2 for the VCWPD's full response to this comment.

K-2 The VCWPD appreciates the suggestion presented in this comment as well. As addressed in response to comment I-2, implementation of the proposed project is anticipated to be completed by Ventura County's local workforce. Additionally, as addressed in Initial Study Section A.7.4 (Proposed Project), all giant reed and castor bean removed would be chipped and used (e.g., recycled) by the Ventura County Parks Department or taken to a local greenwaste or landscaping company for its use as mulch, trail cover and other purposes. As addressed in Global Response Number 2, the proposed project's methods of giant reed removal are

considered very cost effective. Due to VCWPD's standard contract specification requirements, the VCWPD cannot employ or otherwise use the public at large for giant reed removal due to issues related to liability.

K-3 As addressed in Global Response Number 2, the VCWPD has evaluated several alternatives for giant reed removal, and has concluded that the proposed methods would be the environmentally least damaging. Additionally, as outlined in Global Response Number 4, giant reed is extremely persistent and re-treatments are necessary to fully eradicate it, regardless of the initial method chosen for its removal. Please refer to Global Response Number 1 for the VCWPD's evaluation of, and response to the medical toxicity of glyphosate.

Comment Letter L
Ms. Marleen Luckman

L-1 The VCWPD appreciates the concerns expressed in this correspondence. As addressed in Global Response Number 1, the proposed project does not involve the use of Roundup®. Please refer to Global Response Number 1 for the VCWPD's full response to this comment.

L-2 As addressed in Global Response Number 2, the VCWPD has evaluated several alternatives for giant reed removal, and has concluded that the proposed methods would be the environmentally least damaging. Additionally, as addressed in response to comment K-2, implementation of the proposed project would be anticipated to be completed by Ventura County's local workforce, and, due to VCWPD's standard contract specification requirements, the VCWPD cannot employ or otherwise use the public at large for giant reed removal due to issues related to liability. Please refer to Global Response Number 2 for the VCWPD's full response to this comment.

Comment Letter M
Mr. Byron Rader

M-1 The VCWPD appreciates the concerns expressed in this correspondence. As noted in response to comment L-1, the proposed project does not involve the use of Roundup®. Please refer to Global Response Number 1 for the VCWPD's full response to this comment.

Comment Letter N
Ms. Lynda K. Rader

N-1 The VCWPD appreciates the concerns expressed in this correspondence. As noted in response to comment L-1, the proposed project does not involve the use of Roundup®. Please refer to Global Response Number 1 for the VCWPD's full response to this comment.

Comment Letter O
Ms. Susan Draffan

O-1 The VCWPD appreciates the concerns expressed in this comment. As addressed in Global Response Number 4, a Water Quality Monitoring Plan would be prepared and implemented for the proposed project, including water sample collection and testing prior to, during and following the initial treatment, as well as re-treatments. For the same reasons as outlined in

Global Response Number 4, the water quality of the neighborhood well referenced in comment O-1 is not anticipated to be impacted by the proposed project. Please refer to Global Response Numbers 1 and 2 for the VCWPD's full response to this comment.

O-2 As addressed in Global Response Number 2, the VCWPD has evaluated several alternatives for giant reed removal, and has concluded that the proposed methods would be the environmentally least damaging.

O-3 Comment noted. Please refer to Global Response Number 1 for the VCWPD's full response to this comment.

O-4 The VCWPD appreciates the concerns expressed in this comment. Please refer to Global Response Number 1 for the VCWPD's full response to this comment.

O-5 Comment noted. The legend for Initial Study Figure A.7-1 (Giant Reed Percent Density and Distribution) should have included a color classification code for giant reed coverage in the range of 16 percent to 49 percent coverage, which the commenter noted as missing. Only one small area of giant reed (an 0.39 acre area located along Thacher Creek, near Thacher School) falls in this range, having an estimated 20 percent coverage. It is noted, however, that following publication and distribution of the Public Mitigated Negative Declaration and supporting Initial Study, a supplemental field survey was conducted to assess previously unsurveyed giant reed density, as allowed by property owner permission. Based upon the additional information obtained through this supplemental survey, Initial Study Figures A.4-1 and A.7-1 have been revised, including corrections for the above-referenced omission. The text and tables of the Final Mitigated Negative Declaration and supporting Initial Study have also been corrected to correlate with the revised Initial Study figures. The revised giant reed acreages, by percent coverage categories, are now as follows: "Less Than 0.2 Percent;" "0.3 Percent to 5 Percent;" "6 Percent to 10 Percent; "11 Percent to 19 Percent;" "20 Percent to 70 Percent;" and, "Greater than 70 Percent." The commenter is correct that only areas with coverage of 20 percent or greater will be treated with foliar herbicide spray, which amounts to a total of approximately 4.84 acres, as noted in Initial Study revised Table A.7-1.

O-6 The VCWPD has not engaged in any giant reed removal activities on lands in Los Padres National Forest that are under the jurisdiction of the U.S. Department of Agriculture, National Forest Service. Under the proposed project, approximately 95 percent of all of the giant reed targeted for removal would be transported to Soule Park for chipping and used by the Ventura County Parks Department for mulch, trail cover and other uses. As noted in Global Response Number 1, under the Matilija Dam Ecosystem Restoration Project Giant Reed Removal Project, the VCWPD has not detected any glyphosate in chipped giant reed materials. As such, the chipped material produced under the proposed project is not anticipated to expose persons using the park to any toxins.

O-7 The VCWPD appreciates the concerns expressed in this comment. As outlined in Initial Study Section B.21 (Public Health) and supported by Global Response Number 1, the proposed project would not result in significant adverse impacts to public health and safety. Additionally, as noted in Initial Study Sections A.7.2 (Project Objectives), A.7.3 (Project Benefits) and B.6 (Biological Resources), the proposed project would result in several environmental benefits. The VCWPD fully supports environmental stewardship and, for the reasons outlined in Global

Response Number 2, has determined that the proposed giant reed removal methods would be the environmentally least damaging. This conclusion is supported by the USACE, as indicated in Global Response Number 2, and the CDFG as well (please refer to comment letter B).

Comment Letter P
Ms. Noreen Murano and Ms. Anna Huber, Wildscape Restoration

P-1 Comment noted. The VCWPD estimates that approximately 900 gallons of Aquamaster® would be used for cut and daub applications for the proposed project. The estimate is based on an approximate rate of 64 to 96 ounces of product per 400 square feet. The Initial Study and Mitigated Negative Declaration have been revised to reflect this estimate.

P-2 As indicated in Initial Study Section A.7.4 (Proposed Project), under the cut and daub treatment, the cut giant reed material would be transported to Soule Park for chipping and subsequently used by the Ventura County Parks Department for mulch, trail cover, or other uses as identified by the Parks Department. Under the foliar spray method (five percent or less of all of the giant reed targeted for removal), the sprayed material may be left in place or, once dead, cut and removed. If the dead material is cut and removed, this activity would occur several months following the foliar spray treatment, and after the chipping equipment and staging area at Soule Park have been removed. As such, if the giant reed material is cut and removed, it would be taken to a local greenwaste or landscaping company for its use. If the local greenwaste or landscaping company chooses to chip the material, it would do so independently of the proposed project. Because the VCWPD has not yet determined with certainty whether the dead material would be cut and removed, specifics regarding the types of equipment that would be used cannot be provided. However, for the purposes of the Initial Study's air quality and noise and vibration analyses (Initial Study Sections B.3 and B.19, respectively), a "worst case" scenario similar to the equipment and transportation needs for the initial removal of the cut and daub method was assumed. As suggested, the term "groundcover" has been removed from the text of the Initial Study and Mitigated Negative Declaration to avoid misinterpretation that the giant reed would be used as live plant material that could resprout.

P-3 Comment noted. The text in Initial Study Section A.7.4 (Proposed Project) for the removal of castor bean seed head has been revised to reflect that the seed heads would be bagged as they are removed. Additionally, the reference to wrapping or bagging the dead castor bean plant material prior to its transport has been deleted. Isolating this plant material would not be necessary once the seed head is removed.

P-4 The VCWPD has already coordinated with the property owners whose lands would be traversed during implementation of the proposed project, and the VCWPD would secure their permission to access these lands prior to any giant reed removal activities. No trespassing would occur. Pre-project noticing would be provided to all affected property owners and any other parties that specifically request that the VCWPD provide them with noticing. Active work areas near public roads or intersections would also be clearly posted with signs that would discourage plant gathering or other uses, as noted in Initial Study Section A.7.4 (Proposed Project). The text of Initial Study Section A.7.4 (Proposed Project) has been revised to reflect that pre-project property access permission would be secured prior to implementation of the proposed project. It is additionally noted that prior to implementation of the proposed project, the VCWPD has

committed to publishing an article in the "Ojai Valley News" to further explain the goals and intent of the proposed project, the proposed herbicides to be used and their application methods, and the types of risks associated with these herbicides. This article would also include an estimated date for the start of proposed project activities and the name and phone number of a VCWPD representative that may be contacted for further information.

P-5 Comment noted. The text of both the Initial Study and Mitigated Negative Declaration have been revised to reflect that a Pest Control Advisor would prepare a written recommendation for review and approval by the Ventura County Agricultural Commissioner. The text of both the Initial Study and Mitigated Negative Declaration have also been revised to reflect that on-site herbicide applications would be supervised or completed by personnel that have a Qualified Applicator License or Qualified Applicator Certificate.

P-6 The schedule for the proposed project's implementation has been revised. No on-site activities would occur prior to September 15, 2009, and the text of both the Initial Study and Mitigated Negative Declaration have been revised to reflect this.

P-7 It is currently anticipated that the same type of herbicide application used for any given area's initial application would be used for re-treatments. The text of the Initial Study and Mitigated Negative Declaration have been revised to clarify re-treatment applications.

P-8 Comment noted. Mitigation Measure B-3 has been revised to reflect that no herbicide treatment activities shall be conducted in any of the subject creeks when surface water is present.

P-9 Comment noted. The mitigation measures provided in Initial Study Sections B.9 and B.10 (Paleontological Resources and Cultural Resources, respectively) were developed per the *County of Ventura Initial Study Assessment Guidelines* (Guidelines), dated October 15, 2008. However, it is acknowledged that the term "shall" is used in the language of the Guidelines and it is not used in the subject mitigation measures; as such, it is acknowledged that the enforceability of these mitigation measures is compromised. The language of Mitigation Measures P-1 and C-1 has been modified to include the word "shall," consistent with the Guidelines.

P-10 Comment noted. The terminology used for Mitigation Measure N-3, and references to it, are specific to the terminology used in the *County of Ventura Construction Noise Threshold Criteria and Control Plan* (Plan), dated November 2005. To maintain consistency with Appendix D (Construction Noise Mitigation Measures) of the Plan, the language of Mitigation Measure N-3 has not been changed.

Comment Letter Q
Ms. Patty Pagaling

Q-1 Comment noted. According to the California Department of Pesticide Regulation, during 2007 (the most recent year for which data is available), an estimated 6,214,628 pounds of pesticides were used in Ventura County. For that year, the following pesticides were the most commonly used, in descending order of use (e.g., greatest to least): chloropicrin; 3-dichloropropene; methyl bromide; mineral oil; and, petroleum oil. The primary uses of these pesticides included

soil fumigation/replanting and strawberry, pepper/fruiting, raspberry, tomato, lemon, orange, avocado and tangerine production. It has been noted by the Ventura County Agricultural Commissioners Office that Roundup® is a commonly used product, particularly along rights-of-ways and for weed removal (personal communication between Sue Walker, Aspen Environmental Group and Rudy Martel, Ventura County Agricultural Commissioners Office, August 11, 2009). However, according to the California Department of Pesticide Regulation's statistics, between 2006 and 2007 there was a 647,762-pound decline in pesticide use within Ventura County (from 6,862,390 pounds to 6,214,628 pounds).

The VCWPD supports environmental sustainability, which includes the prevention of long-term environmental degradation so that natural resources can be allowed to replenish at naturally occurring rates. The VCWPD does not believe that the proposed project would negatively affect sustainability within the Ojai Valley, or Ventura County as a whole. To the contrary, the removal of non-native plants and the restoration of native habitat would support environmental enhancement and sustainability.

Q-2 Comment noted. As addressed in Global Response Number 2, the VCWPD has evaluated several alternatives for giant reed removal, and has concluded that the proposed methods would be the environmentally least damaging.

Comment Letter R
Ms. Renee Roth

R-1 The VCWPD appreciates the concerns expressed in this comment. However, the VCWPD believes that the proposed project's Mitigated Negative Declaration and supporting Initial Study fully address the potential impacts related to herbicide use, including impacts to federal and State listed wildlife and plant species and sensitive receptors, as outlined in Initial Study Sections B.2 (Land Use), B.3 (Air Quality), B.6 (Biological Resources), B.19 (Noise and Vibration), B.21 (Public Health), B.29 (Education), and B.30 (Recreation).

R-2 Comment noted. As addressed in response to comment P-4, prior to implementation of the proposed project, the VCWPD would notify all affected property owners, as well as any other parties that request noticing. Please refer to response to comment P-4 for the VCWPD's full response to this comment.

As addressed in Global Response Number 3, the timing for implementation of the proposed project is being driven by the timing of a grant, which requires the VCWPD to start work in the fall of 2009.

Please refer to Global Response Number 1 for the VCWPD's full response to herbicide use.

R-3 As addressed in Global Response Number 1, the proposed project would not involve the use of Roundup®. Additionally, as noted in Global Response Number 4, the proposed project would include a Water Quality Monitoring and Testing Program that would require water quality samples to be collected and analyzed prior to, during, and following implementation of the proposed project. As with the Matilija Dam Ecosystem Restoration Project Giant Reed Removal Project, the results of the proposed project's Water Quality Monitoring and Testing Program would be made publicly available.

R-4 Comment noted. Please refer to Global Response Number 4 for the VCWPD's full response to this comment.

R-5 Comment noted. Due to private property access restrictions, not all areas of giant reed that are likely to occur within the proposed project area could be assessed during the field surveys conducted for the Mitigated Negative Declaration and its supporting Initial Study. The treatment method used for these areas would be contingent on the density of the giant reed and site-specific conditions (e.g., foliar spray would not be permissible within 25 feet of any surface water, within 25 feet of any road, within 50 feet of any orchard/agricultural crop, or within 200 feet of any structure). Regardless of the method used, herbicide applications for these areas would comply with all applicable regulations and specifications set forth by the USEPA, the California Department of Pesticide Regulation, Ventura County Agricultural Commissioner, the Ventura County Environmental Health Division and the mitigation measures and protocols presented in the proposed project's Mitigated Negative Declaration and its supporting Initial Study.

R-6 Based upon review of the website referenced in comment R-6, the potential effects quoted in the comment are specific to a currently unpublished study related to amphibians and the use of Roundup Ready Soy®. As noted in Global Response Number 1, Roundup® is not, in any form, proposed for use during implementation of the Upper San Antonio Creek Watershed Giant Reed Removal Project. Please see Global Response Number 1 for the VCWPD's full response to this comment.

R-7 Please refer to the second part of response to comment P-4. The VCWPD believes that with publication of the article referenced in comment P-4, in conjunction with: (1) the global and individual responses to comments contained in this appendix; and, (2) the proposed project's Mitigated Negative Declaration and its supporting Initial Study, the public has been provided with complete and thorough documentation for the proposed project. Please refer to Global Response Number 2 for the VCWPD's full response to alternative methods of giant reed removal.

R-8 The comment letter provided as part of comment R-8 pertains to a proposed "Stipulated Injunction" that would establish a series of deadlines within which the USEPA would make "effects determinations" for certain pesticides as they relate to eleven species found in the greater San Francisco Bay area that are listed as endangered or threatened under the Endangered Species Act. Glyphosate is not one of the 74 chemicals addressed in the "Stipulated Injunction."[1]

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[1] The 74 pesticides addressed under the "Stipulated Injunction" include: 2,4-D; acephate; acrolein; alachlor; aldicarb; aluminum phosphide; atrazine; azinphos-methyl; bensulide; beta-cyfluthrin; bifenthrin; brodifacoum; bromadiolone; bromethalin; carbaryl; carbofuran; chlorophacinone; chlorothalonil; cholecalciferol; chlorpyrifos; cyfluthrin; cyhalothrin (lambda); cypermethrin; deltamethrin; diazinon; difethialone; dimethoate; diphacinone; diquat dibromide; disulfoton; endosulfan; EPTC (eptam); esfenvalerate; ethoprop; fenpropathrin; fipronil; fluvalinate; imidacloprid; magnesium phosphide; malathion; maneb; mancozeb; metam sodium; methamidophos; methidathion; methomyl; methoprene; methyl bromide; metolachlor; naled; oryzalin; oxydemeton-methyl; oxyfluorfen; PCNB; pendimethalin; permethrin; phenothrin; phomet; phorate; potassium nitrate; propargite; resmethrin; metolachlor; simazine; sodium cyanide; sodium nitrate; strychnine; tetramethrin; thiobencarb; tralomethrin; trifulralin; warfarin; zeta-cypermethrin; and, zinc phosphide.

While the "Stipulated Injunction" comment letter provided with comment R-8 does reference glyphosate under Article II, this reference is specific to Rodeo®. As with the case of Roundup®, under the proposed project Rodeo® would not be used. As addressed in Global Response Number 1, Aquamaster® and a surfactant such as Agri-Dex® and/or Activator 90® would be used. As such, the "Stipulated Injunction" comment letter is not considered applicable to the proposed project.

Verbal Comments Set S
Regular Meeting of the Ventura County Board of Supervisors
July 14, 2009

S-1 The VCWPD appreciates the concerns expressed in this comment. As noted in Global Response Number 1, under the proposed project Roundup® would not be used. Please refer to Global Response Number 1 for the VCWPD's full response to this comment.

S-2 As discussed in Global Response Number 2, the VCWPD is aware of, and has evaluated several alternatives for, the removal of giant reed. The methods proposed for the Upper San Antonio Creek Watershed Giant Reed Removal Project are considered to be the environmentally least damaging. As addressed in response to comment K-2, due to VCWPD's standard contract specification requirements, the VCWPD cannot employ or otherwise use the public at large for giant reed removal due to issues related to liability. Additionally, as addressed in Initial Study Section A.7.4 (Proposed Project), the giant reed and castor been material that would be removed would be re-used by the Ventura County Parks Department; consequently, the proposed project would result in the generation of a beneficial end product. As noted in response to comment S-1, the proposed project would not involve the use of Roundup® (please refer to Global Response Number 1). As discussed in Global Response Number 4, giant reed is extremely persistent and to ensure its full eradication, monitoring and re-treatment (or re-removal) ideally continues for at least five years or longer, regardless of the removal method chosen.

S-3 The VCWPD appreciates the concerns expressed in this comment. As provided for in Global Response Number 4 (Table 2), as part of the Matilija Dam Ecosystem Restoration Project Giant Reed Removal Project, during the years 2008 and 2009 the VCWPD implemented four re-treatments using a total of approximately 733 gallons of Aquamaster® in the Ventura River watershed. The estimated 1,200 pounds of glyphosate referenced in comment S-3 is an incorrect figure with regard to the giant reed removal efforts of the VCWPD.

S-4 As addressed in Global Response Number 4, giant reed cannot be fully eradicated within the context of a single removal effort; re-treatment is necessary, regardless of the removal method used (either by hand, with herbicide use, or both). However, as noted in Global Response Number 4 (Table 2), progressively less herbicide is required for each re-treatment. Re-treatments are considered to be a function of the persistence and tenacity of giant reed itself, and not a function of the proposed herbicide product type.

S-5 Response to comment Q-1 verifies the amount of pesticide use in Ventura County noted in comment S-5. Please see response to comment Q-1 for the VCWPD's full response to comment Q-1.

S-6 The VCWPD appreciates the concerns expressed in this comment. Please refer to Global Response Number 1 for the VCWPD's full response to this comment.

S-7 The VCWPD has assessed the various methods for giant reed removal, as outlined in Global Response Number 2. As addressed in Initial Study Section A.7.4 (Proposed Project), the giant reed and castor bean material would be chipped and reused (e.g., recycled) by the Ventura County Parks Department for mulch, trail cover and other purposes. As noted in response to comment K-2, due to VCWPD's standard contract specification requirements, the VCWPD cannot employ or otherwise use the public at large for giant reed removal due to issues related to liability.

S-8 The VCWPD appreciates the concerns expressed in this comment. Please refer to Global Response Numbers 1 and 2 for the VCWPD's full response to this comment.

S-9 Comment noted. The comment refers to a "city project headed up by Brian Holly to manually remove the invasive non-native species in Libbey Park creek area." According to a personal communication between Elizabeth Martinez, VCWPD and Brian Holly, BioResource Consultants, Inc., August 14, 2009, the Libbey Park project involves manually removing non-native invasive species from the creek banks (encompassing approximately 1.4 acres) using a non-profit youth group called Concerned Resources & Environmental Workers (the CREW) which has paid workers age 14+ and equipment to conduct the work. The species targeted for manual removal under the Libbey Park project include mostly non-native ground cover (e.g., periwinkle [*Vinca major*]) and Siberian elm shoots; notably there is only one very small clump of giant reed on the site. Therefore, the VCWPD does not believe that this is a particularly appropriate project to reference in regard to an example of manual removal of giant reed. Although the VCWPD acknowledges that hand removal of giant reed can be fully effective, as noted in Global Response Number 2, this method is not particularly advantageous for spatially extensive removal projects, or projects that involve removal in creek beds intermingled with large cobbles, native tree roots and other vegetation, as is the case for the proposed project. For the reasons outlined in Global Response Number 2, the VCWPD believes that the removal methods identified for the proposed project are the environmentally least damaging. The VCWPD concurs that giant reed can be re-used for many purposes, and, as noted in response to comment S-7, under the proposed removed project giant reed would be recycled in a beneficial way.

S-10 The VCWPD appreciates the concerns expressed in this comment. Please refer to Global Response Number 1 for the VCWPD's full response to this comment.

S-11 Comment noted. As addressed in Global Response Number 2, the VCWPD has considered manual removal methods, and believes that removal methods proposed for the Upper San Antonio Creek Watershed Giant Reed Removal Project are the environmentally least damaging.

S-12 The VCWPD has been working with the commenter regarding the proposed project since the July 14, 2009 Board of Supervisors meeting. However, as addressed in response to comment K-2, due to VCWPD's standard contract specification requirements, the VCWPD cannot employ or otherwise use the public at large for giant reed removal due to issues related to liability.

S-13 The VCWPD appreciates the concerns expressed in this comment. As discussed in response to comment Q-1, Roundup® is a commonly used product in Ventura County for weed abatement along public rights-of-ways, including public roads. However, the use of Roundup® for weed control along public roads is beyond the scope of the environmental analysis prepared for the proposed project, and public road weed abatement is not an activity conducted by the VCWPD.

S-14 As noted in Global Response Number 1, the VCWPD does not propose to use Roundup® for the Upper San Antonio Creek Watershed Giant Reed Removal Project. Please refer to Global Response Number 1 for the VCWPD's full response to this comment.

S-15 Comment noted. As addressed in Global Response Number 1, Aquamaster® is approved for aquatic use by the USEPA, largely because it lacks surfactants harmful to aquatic life. Additionally, under the proposed project a surfactant such as Agri-Dex® and/or Activator 90® would be applied, which are both approved by the USEPA for aquatic uses. As noted in Global Response Number 4, under the water quality sampling and testing program that the VCWPD has conducted for the Matilija Dam Ecosystem Restoration Project Giant Reed Removal Project no glyphosate has been detected in any of the water samples taken.

S-16 As noted in Global Response Number 1, the VCWPD does not propose to use Roundup® for the Upper San Antonio Creek Watershed Giant Reed Removal Project. Please refer to Global Response Number 1 for the VCWPD's full response to this comment.

S-17 The VCWPD appreciates the concerns expressed in this comment. Under the proposed project, Roundup® would not be applied. As addressed in Initial Study Section B.21 (Public Heath), the proposed project's work crews would be required to adhere to numerous protocols, specifications and Best Management Practices to ensure that their exposure, as well as the public's potential exposure to glyphosate would fall substantially below applicable hazard quotient thresholds. Please refer to Global Response Number 1 for the VCWPD's full response to this comment.

Verbal Comments Set T
Regular Meeting of the Ventura County Board of Supervisors
July 21, 2009

T-1 Comment noted. The commenter was provided with an additional week to submit her written comments. Please refer to comment letter Q and responses to comments Q-1 and Q-2 for the written comments received by the commenter and the VCWPD's responses to them.

T-2 The VCWPD appreciates the concerns expressed in this comment. The Casitas Springs giant reed removal project that the commenter is referring to is known as the Ventura River Arundo Removal Demonstration Project. Please refer to Global Response Number 2 for the VCWPD's full response to this comment.

INITIAL STUDY

for the

UPPER SAN ANTONIO CREEK WATERSHED GIANT REED REMOVAL PROJECT

Prepared for the:

VENTURA COUNTY WATERSHED PROTECTION DISTRICT

State Clearinghouse Number 2009061067

Prepared by:

Aspen Environmental Group
30423 Canwood Street, Suite 215
Agoura Hills, California

September 2009

Funding for this project has been provided in full or in part through an agreement with the State Water Resources Control Board. The contents of this document do not necessarily reflect the views and policies of the State Water Resources Control Board, nor does mention of trade names or commercial products constitute endorsement or recommendation for use.

UPPER SAN ANTONIO CREEK WATERSHED
GIANT REED REMOVAL PROJECT
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A. INITIAL STUDY CHECKLIST

A.1 PROJECT TITLE

Upper San Antonio Creek Watershed Giant Reed Removal Project

A.2 LEAD AGENCY NAME AND ADDRESS

Ventura County Watershed Protection District
800 South Victoria Avenue
Ventura, California 93009-1610

A.3 INITIAL STUDY CONTACT PERSON

Pam Lindsey
Watershed Ecologist
Ventura County Watershed Protection District
800 South Victoria Avenue
Ventura, California 93009-1610
Phone: (805) 654-2036
Fax: (805) 654-3350
Email: Pam.Lindsey@ventura.org

A.4 PROJECT LOCATION AND ASSESSOR'S PARCEL NUMBER(S)

At a regional scale, the Upper San Antonio Creek Watershed Giant Reed Removal Project (herein referenced as the "proposed project" or "project") is located within the Ojai Valley of Ventura County, California. The Ojai Valley is approximately 12 miles north (inland) of the City of Ventura, and is accessed via State Highways 33 and 150. Locally, the proposed project area includes the upper San Antonio Creek watershed, the tributaries of which extend northward from the southwest boundary of Soule Park and Soule Park Golf Course into Los Padres National Forest, which is located northeast and east of the City of Ojai (Ojai). Figure A.4-1 provides a map of the proposed project area.

As detailed in Section A.7 (Project Description), the proposed project involves the removal of giant reed (*Arundo donax*) and the opportunistic removal of castor bean (*Ricinus communis*). Within the proposed project area, removal activities would occur along McNell, Thacher and Reeves Creeks and that segment of upper San Antonio Creek which is located within and north of Soule Park and Soule Park Golf Course. Portions of some of these creeks traverse through the jurisdictional boundaries of Ojai; however, all proposed removal activities would occur in either unincorporated areas of Ventura County, or within Soule Park and Soule Park Golf Course. Although Soule Park and Soule Park Golf Course are located within Ojai's incorporated boundaries, they are owned by Ventura County and operated by the Ventura County Parks Department. Giant reed removal would also occur along some segments of McNell and Thacher Creeks that are located north of the Los Padres National Forest boundary (Figure A.4-1). However, these removal activities would occur within private in-holdings that also fall under the jurisdiction of Ventura County. The Ventura County Assessor's Parcel Numbers (APNs) adjacent to McNell, Thacher, Reeves and upper San Antonio Creeks that may be affected by the proposed project are provided in Appendix 1.

A.5 PROJECT SITE ZONING AND GENERAL PLAN LAND USE DESIGNATIONS

The proposed project area is located within the boundaries of Ventura County's *Ojai Valley Area Plan*. The *Ojai Valley Area Plan* is the detailed land use plan of Ventura County's *General Plan* for the unincorporated area of Ojai and the Ventura River Valley (County of Ventura, 2005a). The predominant land use designation of the proposed project area is Open Space (OS [10, 20, 40 and 80 Acre Minimum]) (County of Ventura, 2005a). Other land use designations associated with the proposed project area include: Rural Institutional (RI-20 Acre Minimum); Rural Residential (RR 2 [2 to 5 Acre Minimum] and RR 5 [5 to 10 Acre Minimum]); and, Urban Residential (UR 2-4 [2 to 4 Dwelling Units per Acre]) (County of Ventura, 2005a). Portions of Reeves, Thacher and upper San Antonio Creeks are additionally designated as Sensitive Biological Resource Areas (County of Ventura, 2005a).

There is no published zoning designation map for the proposed project area (County of Ventura, 2008a). However, General Land Use Policy 1 of the *Ojai Valley Area Plan* requires the zoning for any given parcel to be consistent with its respective *General Plan* land use designation; additionally, all zoning must be consistent with the County's "Zoning Compatibility Matrix" (County of Ventura, 2005a). Consistent with these requirements, it is reasonably assumed that the zoning designations associated with the proposed project area include: Open Space (O-S [10 Acre Minimum]); Agriculture Exclusive (A-E [40 Acre Minimum]); Rural Agriculture (R-A [1 Acre Minimum]); Rural Exclusive (R-E [10,000 Square Feet Minimum]); Single-Family Estate (R-O [20,000 Square Feet Minimum]); Single-Family Residential (R-1 [6,000 Square Feet Minimum]); R-2 (Two-Family Residential [3,500 Square Feet Minimum]); and, potentially, Timberland Preserve (T-P) (County of Ventura, 2005a; County of Ventura, 2005b).

A.6 LEAD AND PARTICIPATING AGENCIES NAMES AND ADDRESSES

Ventura County Watershed Protection District
800 South Victoria Avenue
Ventura, California 93009-1610

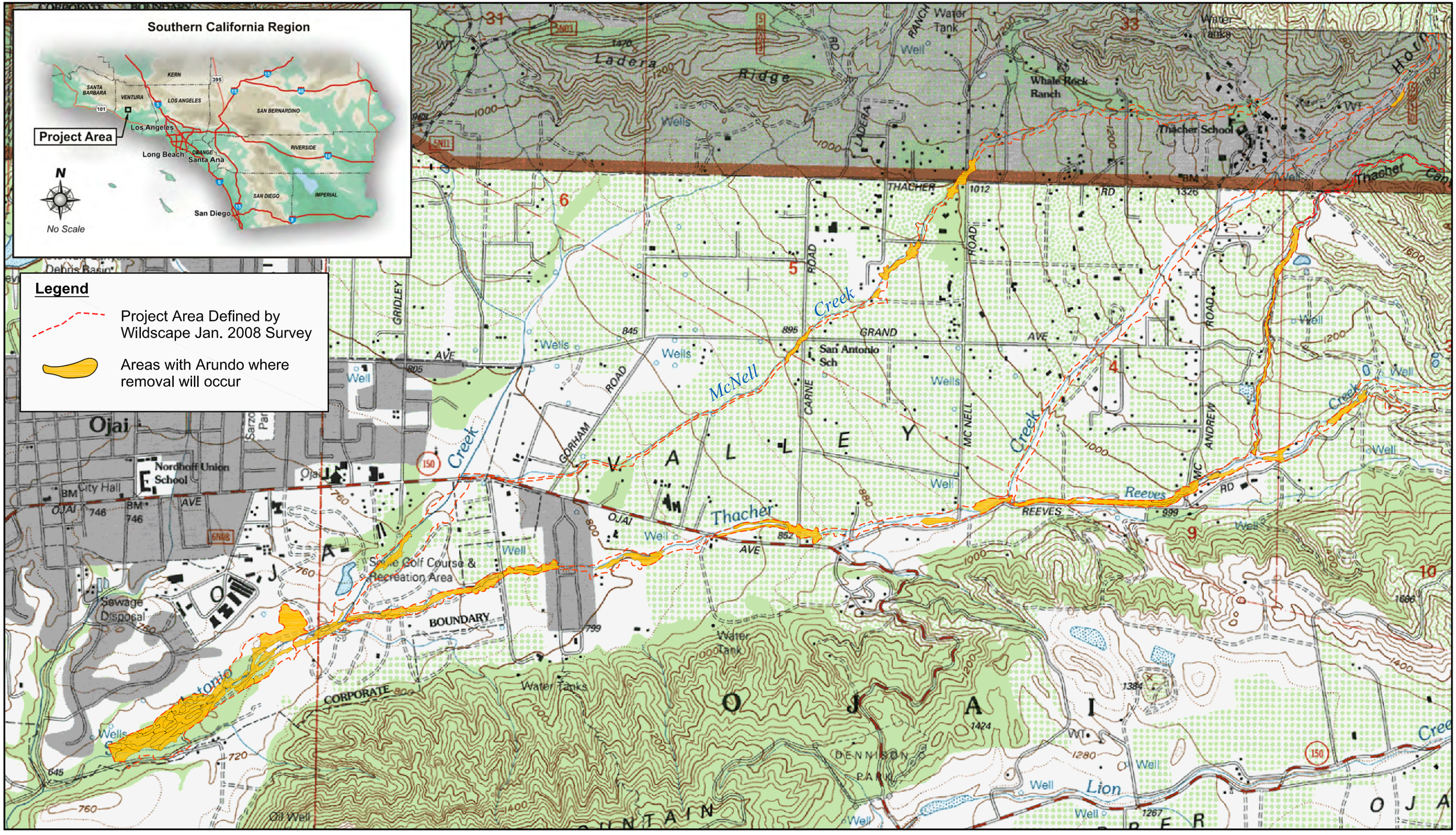
Ventura County Resource Conservation District
P.O. Box 147
Somis, CA 93066

A.7 PROJECT DESCRIPTION

A.7.1 Project Background

Giant reed, or giant cane, and referenced as giant reed in this Initial Study, is a non-native, highly invasive perennial plant that has become established in, and is spreading extensively throughout, riparian ecosystems in California. Giant reed consumes large quantities of water, displaces native vegetation and wildlife, disperses readily via channel flows that occur during heavy rains, and exacerbates flooding, erosion, and fire intensity (County of Ventura, 2007a). Once introduced, giant reed forms expansive rhizome systems that require human intervention to remove.

San Antonio Creek is a tributary of the main branch of the Ventura River, and is part of the river's regional watershed. San Antonio Creek and its tributary creeks contain several areas populated by



Prepared by Aspen Environmental Group

1" = 1,500'
Date: August 25, 2009
File: 1085-27projectmap5.dwg

NORTH

0 750 1,500 3,000
Graphical Scale Feet

Figure A.4-1
Proposed Project Area

giant reed, as well as other non-native invasive plant species. In 2007, the Watersheds Coalition of Ventura County, of which the Ventura County Watershed Protection District (VCWPD) is a participating agency member, was awarded an Integrated Regional Water Management Planning Program (IRWMP) Proposition 50 grant to complete several projects associated with the Ventura River Watershed Protection Project. A specific project approved under the grant is a watershed plan for San Antonio Creek, including implementation of giant reed removal from San Antonio Creek and tributaries thereto. The proposed project described herein represents the latter effort.

A.7.2 Project Objectives

The purpose of the proposed project is to remove giant reed within the upper reaches of the San Antonio Creek watershed and several tributaries to support other existing efforts to remove this invasive plant species along the main stem of the Ventura River and its watershed. At both regional and local scales, objectives of the proposed project are to:

- Restore biological habitat, including special-status species habitat;
- Reduce flood hazards;
- Reduce fire risks;
- Improve water quality; and,
- Enhance water supply reliability and groundwater recharge.

A.7.3 Project Benefits

Due to its large leaf surface area, giant reed consumes more water than native riparian vegetation. Control of giant reed would increase the amount of recharge to local groundwater aquifers. Native plants that recolonize the giant reed removal areas would be expected to take up nutrients, thereby positively affecting pollutant loads in surface water (County of Ventura, 2007a).

The increased amount of water in the targeted removal areas would also improve aquatic and terrestrial habitat, both locally and along the main branch of the Ventura River. The recolonization of native riparian habitat would increase the amount of available suitable habitat for species such as the least Bell's vireo (*Vireo bellii pusillus*), southwestern willow flycatcher (*Empidonax traillii extimus*), California red-legged frog (*Rana aurora draytonii*), and southwestern pond turtle (*Clemmys marmorata pallida*). The increased amount of water available for in-stream use would also contribute to the restoration and enhancement of southern steelhead (*Onchorynchus mykiss*) migration and spawning (County of Ventura, 2007a).

Removal of giant reed would additionally reduce flood hazards. During peak storm events, stands of giant reed can divert flows and cause bank erosion. Furthermore, giant reed stems and rhizomes can be broken or uprooted and transported downstream, where they can form debris dams and damage existing infrastructure such as bridge abutments and culverts. Plant material that ultimately deposits on local beaches can also sprout and form colonies, which subsequently require collection and disposal to landfills. These flood hazards would be reduced with the control of giant reed and the reestablishment of native riparian vegetation (County of Ventura, 2007a).

Giant reed is also highly flammable, and its removal would lessen fire risks by reducing overall fuel loads (or biomass) within San Antonio Creek and its tributaries, thereby resulting in an immediate reduction in fire potential to adjacent land uses (County of Ventura, 2007a).

A.7.4 Proposed Project

The proposed project would remove giant reed where it occurs along upper San Antonio, McNell, Thacher and Reeves Creeks, as shown in Figure A.4-1. The distribution of giant reed within these creeks is patchy; overall, its percent cover relative to other vegetation is fairly low (less than about 20 percent). However, there are a few locations where its percent cover is as much as 76 percent. Figure A.7-1 provides a giant reed distribution and percent cover map of the proposed project area, and Table A.7-1 provides estimates of the percent coverage, by acreage, for the sites targeted for giant reed removal. The proposed project would also involve the opportunistic removal of castor bean; in other words, where castor bean occurs in close proximity to those areas where giant reed is targeted for removal, the castor bean would be removed as well. Castor bean is non-native, perennial shrub which can reach 15 feet or more in height; it grows aggressively along stream banks and can rapidly displace native plant species and habitat.

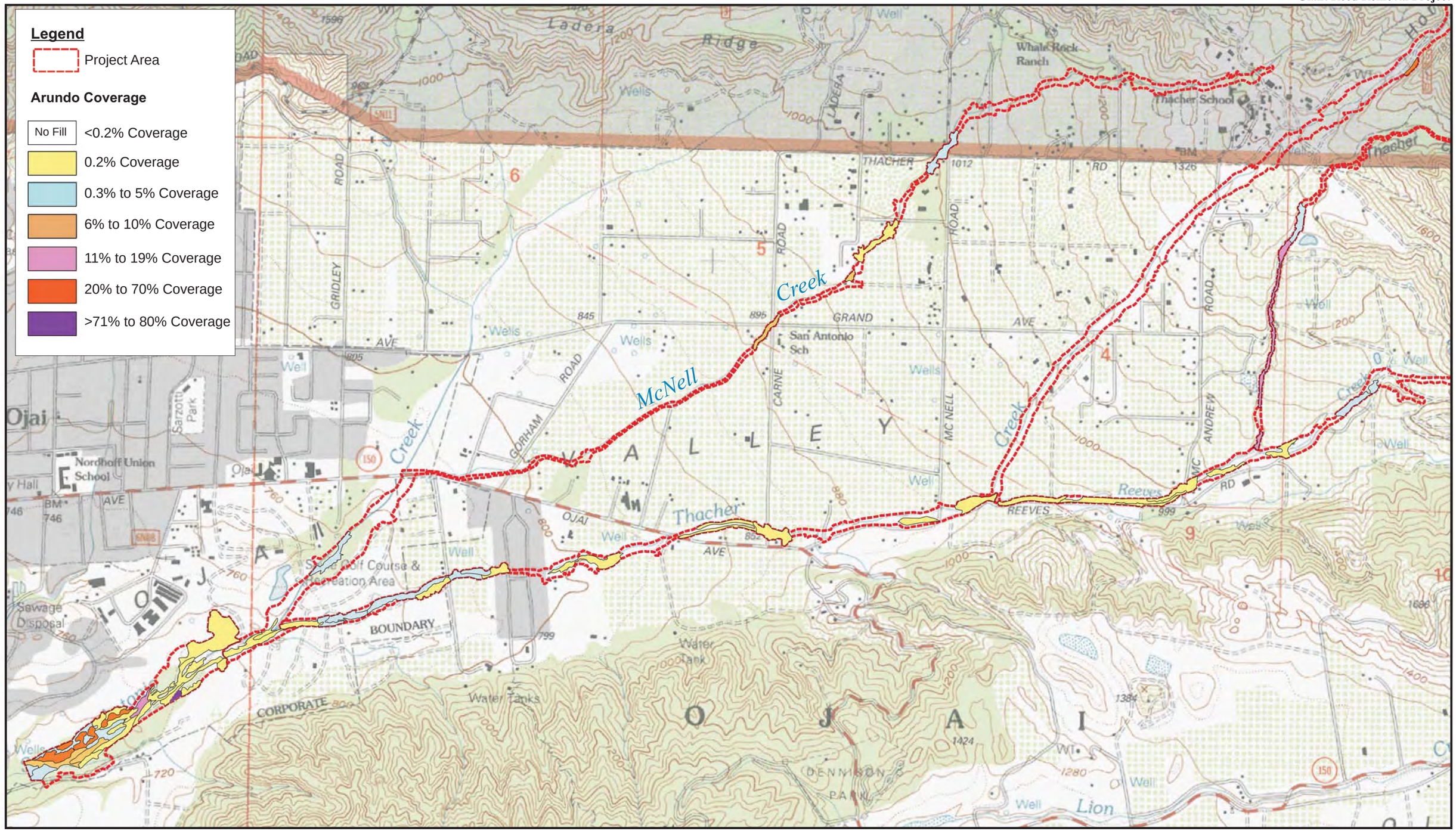
Table A.7-1 Estimated Acreage, By Percent Cover, for Targeted Giant Reed Removal Sites*

Percent Coverage	Estimated Acreage
Less than 0.2	139.56
0.3 to 5	59.71
6 to 10	4.31
11 to 19	3.69
20 to 70	4.49
Greater than 70	0.35
Total	212.10

* Estimates based on October 2008 and June 2009 surveys (Aspen Environmental Group, 2008 and 2009).

Following initial giant reed and castor bean removal activities, the proposed project area would be monitored by the VCWPD or its contractors, and targeted removal areas would be subsequently re-treated with herbicides, as needed, to control the re-growth of these plant species. Native plant species are present at the majority of the targeted removal sites, and it is anticipated that these species would recolonize each site following giant reed and castor bean eradication. Consequently, re-vegetation with native plant species is not proposed.

Initial Herbicide Treatments. Under the proposed project, initial giant reed removal activities would take an estimated eight weeks, or 35 to 40 working days, to complete. It is anticipated that the initial herbicide applications, or treatments, would be completed by two crews of approximately five workers each. The total number of hours required for initial herbicide treatments at any given location would be dependent on the percent cover and extent of giant reed to be removed, as well as the type of treatment applied; however, on average, it is estimated that initial site-specific treatment activities would range between several hours to several working days. No heavy equipment would be required and no sub-surface disturbances would occur. It is anticipated that initial treatments would commence in the fall of 2009, following completion of the project's environmental review and regulatory permit acquisition processes. No herbicide applications would be undertaken within at least 24 hours in advance of any predicted rainfall events, or within 24 hours after a rainfall event.



PREPARED BY Aspen Environmental Group

0 ½ 1
Scale in Miles

N

Figure A.7-1
Giant Reed Percent Coverage and Distribution

It is anticipated that a "cut and daub" treatment would be used for over 95 percent of the initial giant reed removal. Using this treatment, all live giant reed material would be cut with hand held equipment such as chain saws, loppers and power brush cutters to a maximum of six inches above grade level. A glyphosate-based herbicide, such as Aquamaster®, would then be applied. Aquamaster® is approved and labeled for use near and in open water. The herbicide application would be completed within approximately two minutes of cutting and within six inches of grade; it would comprise painting the cambium layer of the freshly cut stalks with a cloth-covered wand or a sponge in a manner that would maximize the stalks' herbicide absorption. A colorant, such as Blaz-on®, would be added to the herbicide solution to identify treated plant material. It is estimated that approximately 900 gallons of herbicide would be used for cut and daub applications; this estimate is based on an approximate rate of 64 to 96 ounces of product per 400 square feet. The cut plant material would be taken off-site either by hand or with small loaders to a haul truck, which would be parked at the closest point of a road that provides access to the targeted removal site. The haul truck would then transport the cut plant material to a chipping site within Soule Park.

It is estimated that less than five percent of the targeted giant reed would be controlled using a foliar spray treatment. This treatment would typically be applied to those stands of giant reed that have a cover of 20 percent or more. These giant reed stands would be foliar sprayed on-site. Once dead, the plant material would then be either left in place or taken to a local greenwaste or landscaping company for its use as mulch or other purposes. As with the cut and daub treatment, a glyphosate-based herbicide such as Aquamaster® would be used. Application rates for foliar spray vary by situation and product; however, it is anticipated that approximately 30 gallons (500 gallons, as diluted by six percent) per day would be needed for initial treatments, and that six gallons (200 gallons, as diluted by three percent) per day would be needed for re-treatments, as needed. Herbicide treatments would also involve the use of an approved surfactant such as Agri-Dex® and/or Activator 90®, both of which are approved for use near and in open water. As with the cut and daub treatment, a non-toxic colorant, such as Blaz-on®, would be applied to the herbicide mixture to distinguish treated versus non-treated plants.

The opportunistic removal of castor bean would include a foliar spray treatment with the types of products described in the above paragraph. Prior to the foliar spray treatment, the seed heads of individual plants would be removed with hand-held mechanical equipment such as clippers or loppers. Due to the invasiveness of castor bean, the seed heads would be bagged or otherwise wrapped and hauled to a landfill as a destruction load. Once the foliar spray is applied, the castor bean would not re-sprout or otherwise re-emerge; consequently, its off-site removal would not be necessary. However, if the VCWPD chooses to remove the dead castor bean material, it would be transported off-site to Soule Park for stock piling and chipping at the same time that the dead giant reed plant material is removed. In those instances where castor bean is removed with a cut and daub treatment, the same procedure and herbicide application as described above for giant reed would be undertaken.

Active work areas near public roads or intersections would be clearly posted with signs that would discourage plant gathering or other uses. Prior to any site-specific activities work crews would also survey the targeted removal areas to ensure that no people or wildlife are present. The VCWPD would also notify all property owners of removal activities by mail at least two weeks prior to any work, and secure all necessary property access agreements.

A Pest Control Advisor (PCA) who holds either a Qualified Applicator License (QAL) or a Qualified Applicator Certificate (QAC) from the California Department of Pesticide Regulation would prepare a written recommendation for herbicide use for the VCWPD, and would submit it to the Ventura County Agricultural Commissioner for review and approval prior to the start of work. While the proposed herbicides are not restricted materials, all work conducted for the VCWPD must have a PCA written recommendation. All on-site herbicide applications would be supervised or completed by personnel that have a QAC or QAL. Additionally, the on-site supervisor would ensure that specific safety measures and manufacturer label specifications and requirements are followed, and that the VCWPD's protocols to avoid herbicide drift into adjacent areas are implemented. The VCWPD protocols and contractor specifications during foliar spray treatments would prohibit this application method within:

- 25 feet of surface water;
- 25 feet of any road;
- 200 feet of a residential home or outbuilding; or,
- 50 feet of an orchard or agricultural field.

In addition to the above, all of the applicable protocols specified in the *Plans and Specifications for the Matilija Dam Ecosystem Restoration Project Giant Reed Removal Project* (County of Ventura, 2007b) would be implemented for the proposed project. To date, implementation of these protocols for the Matilija Dam Ecosystem Restoration Project Giant Reed Removal Project have successfully controlled herbicide applications; glyphosate has not been detected in surface water adjacent to targeted removal areas during post-application water quality monitoring.

Chipping. As noted above, cut giant reed would be transported to Soule Park for chipping, and castor bean plant material may also be transported to the park for chipping. Cut plant material would be placed in haul trucks which would park at points along existing access roads that provide the closest vehicular access to the targeted removal sites. Primary access and transport roads would include Grand Avenue, Ojai Avenue, and Thacher, Reeves and Gorham Roads, although other roads may be used. Boardman Road and Soule Park Drive would provide access directly into and out of the park. It is estimated that approximately 1,000 cubic yards (cys) of unchipped plant material would be transported to Soule Park for chipping, and that on any given day approximately five to seven truck trips to the park would occur.

A chipping and project-related equipment and materials staging would be needed in Soule Park. The location of the chipping and staging area has been identified in consultation with the Ventura County Parks Department to ensure that inconveniences to park users and activities, as well as park maintenance activities, are minimized. It is estimated that one or two chippers would be required for the proposed project. The chippers would operate Mondays through Fridays between the hours of 12:00 p.m. and 6:00 p.m. to minimize disturbance to golfers using Soule Park Golf Course. Operation of the chippers would not be necessary every day. The chippers would be operated only after enough plant material has been accumulated to warrant their efficient use. In total, it is estimated that the chippers would be operated approximately every seven to ten calendar days. All chipped material would be used by the Ventura County Parks Department for mulch, trail cover or other uses as identified by the Parks Department. The chipping and staging area may be fenced and posted with signs to restrict unauthorized access and ensure public safety.

Herbicide Re-Treatments. Following the initial herbicide treatment, a prescribed re-treatment would be undertaken in those areas where giant reed re-emerges. Depending on site-specific conditions, the re-

treatment could occur up to four times annually. It is currently anticipated that re-treatments may continue through 2012, which coincides with the amount of funding that has been provided for the IRWMP Proposition 50 grant, as noted in Section A.7.1. The type of herbicide application used for the initial treatments would typically be used for re-treatments.

The workforce needed for each re-treatment pass is anticipated to require up to three crews of two to four workers each, and would take approximately ten working days to complete. As with the initial treatment, re-treatments would adhere to all VCWPD protocols and manufacturer specifications, be completed or supervised by a PCA, and follow the applicable protocols outlined in the *Plans and Specifications for the Matilija Dam Ecosystem Restoration Project Giant Reed Removal Project* (County of Ventura, 2007b). Public posting and property owner noticing by mail would be undertaken as well.

A.8 SURROUNDING LAND USES AND SETTING

At a regional scale, the proposed project area is located within the Ojai Valley, which is approximately 12 miles north (inland) of the City of Ventura. Land uses are predominantly semi-rural and rural in nature, including agriculture, single family residential homes, and private institutions. The City of Ojai surrounds Soule Park and Soule Park Golf Course, as well as portions of upper San Antonio Creek, and the communities of Meiners Oaks, Mira Monte, Live Oak Acres and Oak View are located to the west and southwest of the proposed project area. These areas are semi-urban to urban in nature, and include land uses such as commercial and services centers, offices, public schools and facilities, and residential development.

As addressed in Section A.7 (Project Description), the proposed project involves the removal of giant reed and castor bean along selected segments of upper San Antonio, McNell, Thacher and Reeves Creeks. The following paragraphs provide the land uses and setting along each principal project reach.

San Antonio Creek at Soule Park and Soule Park Golf Course. Soule Park is 55 acres in size and includes horseshoe pits, tennis courts, a softball field, an equestrian arena and a playground, as well as facilities for picnicking and barbeques (County of Ventura, 2008b, 2008c). Soule Park Golf Course is located north of the park and is 334.8 acres in size; it is a public recreation facility that includes an 18-hole golf course and a clubhouse containing a restaurant and pro-shop (County of Ventura, 2008d). The park and golf course are located within the jurisdictional boundaries of Ojai, but are owned by the County of Ventura and operated by the Ventura County Parks Department. The confluence of Thacher and San Antonio Creeks is located within the golf course. Lands north of the golf course are developed and include residential, commercial, and business uses. Land uses east and west of the park and golf course include open space, agriculture and residential development. Land uses south of the park and golf course include open space and agriculture.

McNell Creek. The confluence of McNell Creek and upper San Antonio Creek is located at upper San Antonio Creek's crossing of East Ojai Avenue (State Highway 150). From their confluence, land uses along McNell Creek are semi-rural to rural in character, and include agriculture (primarily orchards) and single family residential homes. North of Thacher Road, the creek traverses private in-holdings contained within the boundaries of Los Padres National Forest; these in-holdings are under the jurisdiction of Ventura County. San Antonio Elementary School, a public school facility, is located south of the creek's undercrossing of the Grand Avenue and Carne Road intersection.

Thacher Creek. As noted above, the confluence of Thacher and upper San Antonio Creeks occurs within Soule Park Golf Course. East of the confluence, Thacher Creek generally follows the northern boundary of Soule Park. East of the park, the creek bisects an orchard and single family residential neighborhood and then, in an easterly direction, traverses agricultural lands which are predominantly occupied by orchards. The confluence of Thacher and Reeves Creeks occurs approximately 1.6 miles east of the eastern boundary of Soule Park, near McNell Road. North-northeast of their confluence, land uses adjacent to Thacher Creek include agriculture and single family residential homes; the overall land use character surrounding the creek is semi-rural to rural. As with McNell Creek, north of Thacher Road the creek is located within the boundaries of Los Padres National Forest; however, in this area lands traversed by the creek are private in-holdings that fall under the jurisdiction of Ventura County. Thacher School, a private preparatory high school, is located approximately 0.1 mile north of Thacher Road and the creek on this site supports a high density patch of giant reed that will be targeted for removal under the proposed project.

Reeves Creek. In an easterly direction from its confluence with Thacher Creek, Reeves Creek follows the north side of Reeves Road and subsequently enters Wilsie Canyon. The proposed project area along Reeves Creek ends at the eastern terminus of Reeves Road. Between its confluence with Thacher Creek and the eastern terminus of Reeves Road, land uses adjacent to the creek include agriculture (principally orchards) and single family residential homes. The landscape is semi-rural to rural in character.

A.9 OTHER AGENCIES WHOSE APPROVAL MAY BE REQUIRED

- U.S. Army Corps of Engineers. The proposed project will require a Notice to Proceed from the U.S. Army Corps of Engineers (USACE) to use Regional General Permit Number 41 (RGP No. 41) for the removal of invasive, exotic plants. The USACE may consult with the National Oceanic and Atmospheric Administration (NOAA) Fisheries Service and, if required, the U.S. Fish and Wildlife Service (USFWS), to satisfy the requirements of the Federal Endangered Species Act. The State Water Resources Control Board issued a Water Quality Certification (WQC) for RGP No. 41 on August 13, 1998. Consistent with this WQC, the State Water Resources Control Board, Water Quality Certification Program will be notified in writing of the proposed project and the use of RGP No. 41 at least 30 days prior to the anticipated start of the proposed project's activities.
- California Department of Fish and Game. Section 1602 *et seq*. of the California Fish and Game Code requires notification to the California Department of Fish and Game (CDFG) for any project that would create a substantial change to the bed, channel, or bank of any river, stream, or lake, or the use of material from a streambed, river channel or lake. Upon notification, the CDFG determines if a substantially adverse affect to fish or wildlife species may occur. If the CDFG determines a substantial affect may occur, application for and issuance of a Section 1602 permit is required. The issued permit may include conditions of approval that mitigate potential impacts to fish and wildlife species and habitat. The proposed project would require a Section 1602 permit for its implementation.
- California Department of Transportation. Segments of Upper San Antonio and McNell Creeks cross under a State Route 150 bridge located west of Boardman Road, and a portion of Thacher Creek crosses under a State Route 150 bridge located between Gorham and Crane Roads. State Route 150 and its associated bridges fall under the jurisdiction of the California Department of Transportation (CalTrans). Although no giant reed has been identified for removal within the vicinity of the State Route 150 bridge that Upper San Antonio and McNell Creeks cross under, giant reed would be removed along that portion of Thacher Creek which crosses under a State Route 150 bridge. As such, giant reed removal along Thacher Creek within the vicinity of the above-referenced State Route 150 bridge (e.g., within CalTrans' State Route 150 Right-Of-Way) would require an encroachment permit. Prior to the start of construction, the VCWPD will contact CalTrans, District 7, to ensure acquisition of the required encroachment permit.
- Ventura County Air Pollution Control District. The proposed project falls under the jurisdiction of the Ventura County Air Pollution Control District (VCAPCD). Implementation of the proposed project may

require a permit for use of the proposed chipper(s). Prior to the start of construction the VCWPD will contact VCAPCD to determine if a permit is required, and will acquire the permit if needed.

- Ventura County Environmental Health Division. The Ventura County Environmental Health Division is responsible for ensuring conformance with State laws and County ordinances pertaining to the protection public health, including programs related to food protection, hazardous materials, hazardous waste, individual sewage disposal systems, land use, medical waste, ocean water quality monitoring, recreational health, solid waste, underground fuel tanks, and vector control. Prior to the start of construction the VCWPD will contact the Ventura County Environmental Health Division to establish if any type of permit or approval is required, and will acquire the permit if needed.
- Ventura County Transportation Department. Approval may be required from the Ventura County Public Works Agency, Transportation Department, if the loading and transport of cut giant reed and castor bean plant materials requires any temporary lane or road closures, or other temporary traffic diversions, on County roads. Prior to the start of construction the VCWPD will coordinate with the Ventura County Transportation Department to determine if a permit is required, and will acquire the permit if needed.
- Ventura County Agricultural Commissioner. The Ventura County Agricultural Commissioner is responsible for enforcing local ordinances and federal and State laws and regulations governing the agricultural industry. A Pest Control Advisor (PCA) who holds a Qualified Applicator License (QAL) or a Qualified Applicator Certificate (QAC) from the California Department of Pesticide Regulation will prepare a written recommendation for herbicide use for the VCWPD, and will submit the recommendation to the Ventura County Agricultural Commissioner for review and approval prior to start of work.
- City of Ojai. No proposed giant reed or castor bean removal activities would occur within lands falling under the jurisdiction of the City of Ojai. However, proposed removal activities would occur immediately adjacent to lands under the jurisdiction of the City of Ojai, in addition to which the transport of cut giant reed and castor bean to Soule Park would pass through lands within the City of Ojai's jurisdictional boundaries. Prior to the start of construction the VCWPD will contact the City of Ojai to establish if any permits or approvals are necessary, and will acquire the identified permits or approvals if applicable.

INITIAL STUDY CHECKLIST

UPPER SAN ANTONIO CREEK WATERSHED
GIANT REED REMOVAL PROJECT
PROJECT NO. FC011034, ZONE NO. 1

	ISSUE (Responsible Department)	PROJECT IMPACT DEGREE OF EFFECT*				CUMULATIVE IMPACT DEGREE OF EFFECT*			
		N	LS	PS -M	PS	N	LS	PS -M	PS
GENERAL:	**1. General Plan Environmental Goals and Policies (Plng.)**	X				X			
LAND USE:	**2. Land Use (Plng.):**								
	A. Community Character		X			X			
	B. Housing	X				X			
	C. Growth Inducement	X				X			
RESOURCES:	**3. Air Quality (APCD):**								
	A. Regional			X			X		
	B. Local			X			X		
	4. Water Resources (PWA):								
	A. Groundwater Quantity	X				X			
	B. Groundwater Quality		X				X		
	C. Surface Water Quantity	X				X			
	D. Surface Water Quality		X				X		
	5. Mineral Resources (Plng.):								
	A. Aggregate	X				X			
	B. Petroleum	X				X			
	6. Biological Resources:								
	A. Endangered, Threatened, or Rare Species			X			X		
	B. Wetland Habitat	X				X			
	C. Coastal Habitat	X				X			
	D. Migration Corridors	X				X			
	E. Locally Important Species/Communities			X			X		
	7. Agricultural Resources (Ag. Dept.):								
	A. Soils		X				X		
	B. Water		X				X		
	C. Air Quality/Micro-Climate		X				X		
	D. Pests/Diseases	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
	E. Land Use Incompatibility		X				X		
	8. Visual Resources:								
	A. Scenic Highway (Plng.)	X				X			
	B. Scenic Area/Feature		X			X			
	9. Paleontological Resources			X			X		
	10. Cultural Resources:								
	A. Archaeological			X			X		
	B. Historical (Plng.)	X				X			
	C. Ethnic, Social or Religious		X				X		
	11. Energy Resources		X				X		
	12. Coastal Beaches & Sand Dunes	X				X			
HAZARDS:	**13. Seismic Hazards (PWA):**								
	A. Fault Rupture	X				X			
	B. Ground Shaking		X				X		
	C. Tsunami	X				X			
	D. Seiche	X				X			
	E. Liquefaction		X				X		
	14. Geologic Hazards (PWA):								
	A. Subsidence:	X				X			
	B. Expansive Soils	X				X			
	C. Landslides/Mudslides	X				X			
	15. Hydraulic Hazards (PWA/FCD):								
	A. Erosion/Siltation	X				X			
	B. Flooding	X				X			
	16. Aviation Hazards (Airports)	X				X			
	17. Fire Hazards (Fire)		X				X		
	18. Hazardous Materials/Waste:								
	A. Above-Ground Hazardous Materials (Fire)		X				X		
	B. Hazardous Materials (EH)		X				X		
	C. Hazardous Waste (EH)		X				X		
	19. Noise and Vibration			X			X		
	20. Glare		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
	21. Public Health (EH)		X				X		
PUBLIC FACILITIES/ SERVICES:	**22. Transportation/Circulation:**								
	A. Public Roads and Highways:								
	(1) Level of Service (PWA)			X			X		
	(2) Safety/Design (PWA)			X			X		
	(3) Tactical Access (Fire)			X			X		
	B. Private Roads and Driveways (Fire):								
	(1) Safety/Design	X				X			
	(2) Tactical Access	X				X			
	C. Pedestrian/Bicycle:								
	(1) Public Facilities (PWA)		X				X		
	(2) Private Facilities		X				X		
	D. Parking (Plng.)			X			X		
	E. Bus Transit	X				X			
	F. Railroads	X				X			
	G. Airports (Airports)	X				X			
	H. Harbors (Harbors)	X				X			
	I. Pipelines	X				X			
	23. Water Supply:								
	A. Quality (EH)	X				X			
	B. Quantity (PWA)	X				X			
	C. Fire Flow (Fire)	X				X			
	24. Waste Treatment/Disposal:								
	A. Individual Sewage Disposal System (EH)	X				X			
	B. Sewage Collection/Treatment Facilities	X				X			
	C. Solid Waste Management (PWA)		X				X		
	D. Solid Waste Facilities (EHD)		X				X		
	25. Utilities:								
	A. Electric	X				X			
	B. Gas	X				X			
	C. Communication	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
PUBLIC FACILITIES/ SERVICES (CONT.):	**26. Flood Control/Drainage:**								
	A. FCD Facility (FCD)	X				X			
	B. Other Facilities (PWA)	X				X			
	27. Law Enforcement/Emergency Svs. (Sheriff):								
	A. Personnel/Equipment	X				X			
	B. Facilities	X				X			
	28. Fire Protection (Fire):								
	A. Distance/Response Time	X				X			
	B. Personnel/Equipment/Facilities	X				X			
	29. Education:								
	A. Schools		X				X		
	B. Libraries (Lib. Agency)	X				X			
	30. Recreation (GSA):								
	A. Local Parks/Facilities	X				X			
	B. Regional Parks/Facilities			X			X		
	C. Regional Trails/Corridors	X				X			

DEGREE OF EFFECT:
N = No Impact.
LS = Less Than Significant.
PS-M = Potentially Significant Impact Unless Mitigation Incorporated.
PS = Potentially Significant Impact.

AGENCIES:

APCD - Air Pollution Control District
GSA - General Services Agency
Harbors - Harbor Department
Lib. Agency - Library Services Agency
Airports - Department Of Airports
Fire – Fire Protection District
PWA - Public Works Agency
Plng. - Planning Division
FCD - Flood Control District
Sheriff - Sheriff's Department
EH - Environmental Health Division
Ag. Dept. - Agricultural Department

B. ENVIRONMENTAL ANALYSIS AND DISCUSSION OF IMPACTS

B.1 GENERAL PLAN/AREA PLAN ENVIRONMENTAL GOALS AND POLICIES

Proposed Project Impacts. As described in Section A.5 (Project Site Zoning and General Plan Land Use Designations), the proposed project area is located within the boundaries of Ventura County's *Ojai Valley Area Plan*. That portion of the proposed project area that extends east along Thacher Creek, from Soule Park Golf Course to Avenida de la Vereda, would be located within the Sphere of Influence for the City of Ojai (County of Ventura, 2005a). Project activities that are proposed at Soule Park and the Soule Park Golf Course would be within the City of Ojai's incorporated boundaries. However, both Soule Park and Soule Park Golf Course are owned by Ventura County and operated by the Ventura County Parks Department.

The County of Ventura and City of Ojai (Ojai) have adopted General Plans that consist of goals, policies and programs designed to provide planning objectives and guide day-to-day planning actions. Given the location of the proposed project, relevant land use plans would include the Ventura County's *General Plan* and *Ojai Valley Area Plan*, and Ojai's *General Plan*. In order to determine whether the proposed project is consistent with these plans, Table B.1-1 lists the environmental goals and policies that would be applicable to the proposed project, as well as an assessment of the project's consistency with these goals and policies. As outlined in Table B.1-1, the project would be consistent with all applicable goals and policies.

Table B.1-1 Upper San Antonio Creek Watershed Project Applicable Goals and Policies

General Plan Section	Policy or Goal	Consistency Assessment
Ventura County General Plan: Goals, Policies and Programs (Last amended December 6, 2005)		
Section 1.2: Air Quality	Goal 2: Ensure that any adverse air quality impacts, both long-term and short-term, resulting from discretionary development are mitigated the maximum extent feasible.	As addressed in Section B.3 (Air Quality), short-term air quality impacts associated with the proposed project can be mitigated to a level of less than significant. Due to the temporary nature of the project (initial giant reed removal followed by monitoring and re-treatments, as needed, up to four times annually through 2012), no long-term, permanent air quality impacts would occur. The project would be consistent with this goal.
	Policy 1: Discretionary development that is inconsistent with the Air Quality Management Plan (*AQMP*) shall be prohibited, unless overriding considerations are cited by the decision-making body.	As discussed in Section B.3 (Air Quality), the proposed project would not be inconsistent with the Ventura County Air Pollution Control District's (APCD's) *AQMP*. The project would be consistent with this policy.
	Policy 2: The air quality impacts of discretionary development shall be evaluated by use of the Guidelines for the Preparation of Air Quality Impact Analysis.	The proposed project's air quality analysis has been completed per the Ventura County APCD's *Air Quality Assessment Guidelines*, as addressed in Section B.3. The project would be consistent with this policy.
	Policy 3: Discretionary development that would have a significant adverse air quality impact shall only be approved if it is conditioned with all reasonable mitigation measures to avoid, minimize or compensate (offset) for the air quality impact. Developers shall be encouraged to employ innovative methods and technologies to minimize air pollution impacts.	As described in Section B.3 (Air Quality), all air quality impacts associated with the proposed project can be mitigated to a level of less than significant. The project would be consistent with this policy.

General Plan Section	Policy or Goal	Consistency Assessment
	Policy 5: Development subject to APCD permit authority shall comply with all applicable APCD rules and permit requirements, including the use of best available control technology (BACT) as determined by the APCD.	As addressed in Section A.9 (Other Agencies Whose Approval May Be Required), the initial phase of the proposed project would require the operation of chippers that could require a permit from the Ventura County APCD. The VCWPD will contact the APCD to determine if a permit is required. Additionally, the Ventura County APCD has reviewed this Initial Study and its comments and recommendations have been incorporated. The project would be consistent with this policy.
Section 1.3: Water Resources	Goal 3: Maintain and, where feasible, restore the chemical, physical and biological integrity of surface and groundwater resources.	As described in Section A.7 (Project Description), the proposed removal of giant reed would allow for the recolonization of native plants, which are expected to improve water quality. The project would be consistent with this goal.
	Goal 5: Protect and, where feasible, enhance watersheds and aquifer recharge areas.	The project would not extract groundwater, and would likely increase the amount of recharge to local groundwater aquifers (see Section B.4 [Water Resources]). The project would be consistent with this goal.
	Policy 1: Discretionary development which is inconsistent with the goals and policies of the County's Water Management Plan (WMP) shall be prohibited, unless overriding considerations are cited by the decision-making body.	The proposed project would not conflict with the objectives and priorities of Ventura County's Integrated Regional Water Management Plan (WCVC, 2006). The project would be consistent with this policy.
	Policy 2: Discretionary development shall comply with all applicable County and State water regulations.	The proposed project has received certification from the State Water Resources Control Board, and removal activities would follow the protocols of the VCWPD (see Section B.4 [Water Resources]). The project would be consistent with this policy.
	Policy 4: Discretionary development shall not significantly impact the quantity or quality of water resources within watersheds, groundwater recharge areas or groundwater basins.	As described in Section B.4 (Water Resources), the proposed project would utilize a glyphosate-based herbicide that has been approved for use near and in open water, and has little potential for leaching to groundwater. The project is anticipated to improve water quality through the recolonization of native plants, and enhance water supply reliability and groundwater recharge. The project would be consistent with this policy.
Section 1.5: Biological Resources	Goal: Preserve and protect significant biological resources in Ventura County from incompatible land uses and development. Significant biological resources include endangered, threatened or rare species and their habitats, wetland habitats, coastal habitats, wildlife migration corridors and locally important species/communities.	As described in Section B.6 (Biological Resources), the proposed project may result in some temporary impacts to endangered, threatened or rare species and their habitats and locally important species/communities. However, all impacts would be short-term in nature and can be mitigated to a level of less than significant. As also addressed in Section B.6, the removal non-native invasive plant species from the proposed project area would result in long-term beneficial impacts, both directly and indirectly, to endangered, threatened or rare species and their habitats, wetland habitats, coastal habitats, wildlife migration corridors and locally important species/communities. The project would be consistent with this goal.

General Plan Section	Policy or Goal	Consistency Assessment
	Policy 1: Discretionary development which could potentially impact biological resources shall be evaluated by a qualified biologist to assess impacts and, if necessary, develop mitigation measures.	As addressed in Section A.7 (Project Description), the proposed project does not involve any physical development; it is specific to the removal of non-native vegetation. None-the-less, the proposed project has been evaluated by qualified biologists, as listed in Section E (Initial Study List of Preparers and Reviewers) to assess its potential impacts. The project would be consistent with this policy.
	Policy 2: Discretionary development shall be sited and designed to incorporate all feasible measures to mitigate any significant impacts to biological resources.	As addressed above, the proposed project does not involve any physical development. None-the-less, the proposed project has been designed to incorporate several giant reed removal protocols and requirements to protect biological resources, as outlined in Sections A.7 (Project Description) and B.6 (Biological Resources). Additionally, as addressed in Section B.6, a suite of mitigation measures would be implemented to further minimize impacts to biological resources. No adverse significant impacts would occur. The project would be consistent with this policy.
	Policy 3: Discretionary development that is proposed to be located within 300 feet of a marsh, small wash, intermittent lake, intermittent stream, spring, or perennial stream (as identified on the latest USGS 7 minute quad map), shall be evaluated by a County-approved biologist for potential impacts on wetland habitats. Discretionary development that would have a significant impact on significant wetland habitats shall be prohibited, unless mitigation measures are adopted that would reduce the impact to a less than significant level.	The proposed project would involve the removal of giant reed and castor bean within the beds and banks of upper San Antonio, Reeves, Thacher, and McNell Creeks in the Ojai Valley. As addressed in Section B.6B (Wetland Habitat), per recent biological surveys the stream hydrology of these creeks appears to be intermittent. The proposed project would enhance and restore native riparian habitat and wetland habitat through the removal of competing invasive non-native plant species. Potential impacts of the proposed project have been evaluated by a County-approved biologist, as identified in Section E (Initial Study List of Preparers and Reviewers). Additionally, as addressed in Section B.6 (Biological Resources) the proposed project has been designed to incorporate established giant reed removal protocols and requirements to protect biological resources, and would also involve the implementation of several mitigation measures to further minimize impacts to biological resources. No significant adverse impacts to wetland habitat would occur. The project would be consistent with this policy.
	Policy 4: Discretionary development shall be sited a minimum of 100 feet from significant wetland habitats to mitigate the potential impacts on said habitats. Buffer areas may be increased or decreased upon evaluation and recommendation by a qualified biologist and approval by the decision-making body.	The proposed project would involve the removal of giant reed and castor been within the beds and banks of upper San Antonio, Reeves, Thacher, and McNell Creeks in the Ojai Valley. As addressed under Policy 3, above, the proposed project would restore and enhance wetland habitats. Additionally, all short-term impacts would be minimized through implementation of the project's established giant reed removal protocols and requirements and the mitigation measures contained in this Initial Study. No significant adverse impacts to wetland habitat would occur. The project would be consistent with this policy.

General Plan Section	Policy or Goal	Consistency Assessment
	Policy 5: The California Department of Fish and Game, the U.S. Fish and Wildlife Service, National Audubon Society and the California Native Plant Society shall be consulted when discretionary development may affect significant biological resources.	The proposed project's master distribution list for this Mitigated Negative Declaration and Initial Study includes notification to the California Department of Fish and Game, the U.S. Fish and Wildlife Service, National Audubon Society and the California Native Plant Society. As addressed in Section A.9 (Other Agencies Whose Approval May Be Required) the proposed project would require regulatory approvals from the California Department of Fish and Game and U.S. Army Corps of Engineers, the latter of which may, in its process, coordinate with the U.S. Fish and Wildlife Service. The project would be consistent with this policy.
Section 2.7: Landslides/Mudslides	Policy 2: In landslide/mudslide hazard areas, there shall be no alteration of the land which is likely to increase the hazard, including concentration of water through drainage, irrigation or septic systems, removal of vegetative cover, and no undercutting of the bases of slopes or other improper grading methods.	As discussed in Section B.14C (Landslide/Mudflow Hazard), the proposed project would not be located adjacent to a mapped landslide. The project would not involve the development of an area, nor would it construct any structures. The removal of giant reed would allow for the recolonization of native plants, which would reduce bank erosion that is caused by giant reed. The project would be consistent with this policy.
Section 2.10: Flood Hazards	Goal 1: Minimize the risk of loss of life, injury, damage to property, and economic and social dislocations resulting from flood hazards.	As discussed in Section B.15B (Flooding Hazard), the proposed project would reduce flood hazards that are associated with the giant reed's contribution to water flow diversions, bank erosion, and debris dams. The project would be consistent with this goal.
	Policy 1: Land use in the floodway should be limited to open space, agriculture, or passive to low intensity recreational uses, subject to the approval of the County Watershed Protection District. The floodway's principal use is for safely conveying floodwater away from people and property.	The proposed project would remove giant reed and castor bean from portions of the upper San Antonio Creek watershed, which would serve to restore the biological habitat of this riparian area as well as reduce flood hazards. The project would be consistent with this policy.
Section 2.16: Noise	Goal 1: To protect the health, safety and general welfare of County residents by elimination or avoidance of adverse noise impacts on existing and future noise sensitive uses.	As discussed in Section B.19 (Noise and Vibration), the initial phase of the proposed project would temporarily increase noise levels in the project area. However, all noise-related impacts can be mitigated to a level of less than significant and would be short-term in nature. The project would be consistent with this goal.
	Policy 1: All discretionary development shall be reviewed for noise compatibility with surrounding uses. Noise compatibility shall be determined from a consistent set of criteria based on the standards listed below. An acoustical analysis by a qualified acoustical engineer shall be required of discretionary developments involving noise exposure or noise generation in excess of the established standards. The analysis shall provide documentation of existing and projected noise levels at on-site and off-site receptors, and shall recommend noise control measures for mitigating adverse impacts. *(Parts 1 through 3 are not applicable to the project)* (4) Noise generators, proposed to be located near any noise sensitive use, shall incorporate noise control measures so that ongoing outdoor noise levels received by the noise sensitive receptor,	Section B.19 (Noise and Vibration) of this Initial Study provided an acoustical analysis of the proposed project. As addressed in Section B.19, under a "worst case" scenario, the initial phase of the proposed project could result in unmitigated noise levels of approximately 91 dBA at a distance of 50 feet from those creek reaches targeted for giant reed removal and 93 dBA at 50 feet from the chipping area in Soule Park. However, with implementation of Mitigation Measures AQ-1, N-1 through N-9, and T-1, noise-related impacts associated with the proposed project would be less than significant. The proposed project would be consistent with this policy.

General Plan Section	Policy or Goal	Consistency Assessment
	measured at the exterior wall of the building, does not exceed any of the following standards: [a]. Leq1H of 55dB(A) or ambient noise level plus 3dB(A), whichever is greater, during any hour from 6:00 a.m. to 7:00 p.m. [b]. Leq1H of 50dB(A) or ambient noise level plus 3dB(A), whichever is greater, during any hour from 7:00 p.m. to 10:00 p.m. [c]. Leq1H of 45dB(A) or ambient noise level plus 3dB(A), whichever is greater, during any hour from 10:00 p.m. to 6:00 a.m. (5) Construction noise shall be evaluated and, if necessary, mitigated in accordance with the County Construction Noise Threshold Criteria and Control Plan.	
	Policy 3: The priorities for noise control shall be as follows: (1) Reduction of noise emissions at the source. (2) Attenuation of sound transmission along its path, using barriers, landforms modification, dense plantings, and the like. (3) Rejection of noise at the reception point via noise control building construction, hearing protection or other means.	As addressed in Section B.19 (Noise and Vibration), all noise related impacts associated with the proposed project can be mitigated to a level of less than significant through implementation of Mitigation Measures AQ-1, N-1 through N-9, and T-1. The project would be consistent with this policy.
Section 3.1: Land Use General Goals, Policies, and Programs	Policy 3: Consistency of Land Use: Any land use shall be deemed consistent with the General Plan if it is permitted under a zoning designation which is consistent with the General Land Use Maps and the Zoning Consistency Matrix (Policy Number 2), and if the land use does not conflict with any other policy of the County General Plan.	Project activities would not conflict with land use or zoning designations in the project area (see Section B.2A [Community Character]). This table includes a consistency assessment for all County of Ventura plans, goals, and policies that are applicable to the proposed project. As described in this table, the project would not conflict with the Ventura County *General Plan*, and thus would be consistent with this policy.
Section 4.7: Law Enforcement and Emergency Services	Policy 1: The Sheriff's Department shall continue to review discretionary permits to ensure that an adequate level of law enforcement can be provided.	As described in Section B.27A (Law Enforcement/Emergency Services – Facilities), the chipping and staging area at Soule Park would be monitored by the VCWPD or its designated contractor during working hours, and by a Ventura County Parks Department ranger during non-working hours. The project would not require law enforcement services, and thus would be consistent with this policy.
Section 4.10: Parks and Recreation	Policy 2: Discretionary development which would obstruct or adversely impact access to a public recreation resource shall be conditioned to provide public access as appropriate.	As discussed in Section B.30B (Regional Parks/Facilities), implementation of Mitigation Measures R-1 and R-2 would prevent the obstruction of access to the Soule Park equestrian area when chippers are not in use, and provide notification of any temporary equestrian area closures that may be warranted for safety purposes. The project would be consistent with this policy.
Ventura County General Plan, Ojai Valley Area Plan (Last amended November 15, 2005)		
Section 1.1: Air Quality	Goal 1: Promote a level of air quality which protects the public health, safety and welfare and seeks to meet or surpass State and Federal primary and secondary standards.	As addressed in Section B.3 (Air Quality), air quality impacts associated with the proposed project would not conflict with State, Federal or local air quality standards and all short-term impacts can be mitigated to a level of less than significant. The project would be consistent with this goal.

General Plan Section	Policy or Goal	Consistency Assessment
	Policy 1: Discretionary development in the Ojai Valley shall be found to have a significant adverse impact on the regional air quality if daily emissions would be greater than 5 pounds per day of Reactive Organic Compounds (ROC) and/or greater than 5 pounds per day of Nitrogen Oxides (NO_X).	As discussed in Section B.3 (Air Quality), short-term NO_X emissions would exceed the five pound per day significance threshold established by the Ventura County APCD for the Ojai Planning area. However, as noted in the Ventura County APCD's *Air Quality Assessment Guidelines*, due to the short-term nature of the proposed project, this significance threshold does not apply. As indicated in Table B.3-3, total estimated ROC emissions associated with the proposed project would be less than five pounds per day. Therefore, the project would be consistent with this policy.
Section 1.2: Water Resources	Goal 1. Ensure that water which currently meets State standards shall not be degraded and ensure that water quality which does not meet State standards is improved.	The proposed project has received certification from the State Water Resources Control Board, and removal activities would follow the protocols of the Ventura County Watershed Protection District (see Section B.4 [Water Resources]). In addition, the project is anticipated to improve water quality through the reestablishment of native vegetation. As such, the project would be consistent with this policy.
Section 1.4: Biological Resources	Goal 1: Protect significant biological resources within the Ojai Valley in order to maintain natural ecosystems and also preserve the natural beauty of the area.	As addressed in Section B.6 (Biological Resources), the proposed project would not result in any adverse and significant impacts related biological resources. The removal non-native invasive plant species from the upper San Antonio Creek watershed, located in the Ojai Valley, would result in long-term beneficial impacts, both directly and indirectly, to significant biological resources. The project would be consistent with this goal.
	Goal 2: Balance the preservation of wetland habitats with the need to adequately protect public safety and property from flooding hazards.	The proposed removal of giant reed would allow for the reestablishment of native riparian vegetation, and would also serve to reduce flood hazards that are caused by flow diversions and bank erosion from giant reed stands. The project would be consistent with this goal.
	Policy 2: The California Department of Fish and Game, the U.S. Fish and Wildlife Service, the National Audubon Society, the California Native Plant Society and the Los Padres National Forest shall be contacted during the initial 30-day project review period for discretionary development proposals when proposals are submitted which may adversely affect the biological resources under their purview.	The proposed project's master distribution list for this Mitigated Negative Declaration and Initial Study includes notification to the California Department of Fish and Game, the U.S. Fish and Wildlife Service, Los Padres National Forest, National Audubon Society and the California Native Plant Society. As addressed in Section A.9 (Other Agencies Whose Approval May Be Required) the proposed project would require regulatory approvals from the California Department of Fish and Game and U.S. Army Corps of Engineers, the latter of which may, in its process, coordinate with the U.S. Fish and Wildlife Service. The project would be consistent with this policy.
	Policy 5: Proposed discretionary development shall be coordinated with affected agencies that regulate water courses and wetland habitats early in the planning stages so as to ensure that appropriate mitigation measures and the concerns of these agencies are adequately addressed, including protection of anadromous fish habitat.	As addressed under Policy 2, above, the proposed project would require regulatory approvals from the California Department of Fish and Game and U.S. Army Corps of Engineers, the latter of which may, in its process, coordinate with the U.S. Fish and Wildlife Service. The VCWPD has initiated coordination with these regulatory agencies for implementation of the proposed project. The project would be consistent with this policy.

General Plan Section	Policy or Goal	Consistency Assessment
	Policy 8: Discretionary development within 300 feet of the Ventura River, Coyote Creek, San Antonio Creek/Reeves Creek and Lion Canyon Creek, or located within the Sensitive Biological Resources Area shall be reviewed to determine the potential for interference with wildlife migration opportunities and potential for impact on "Endangered", "Threatened", "Rare" or "Locally Important" species and communities. Projects which would result in significant adverse impacts to such resources shall be denied unless they can be mitigated to a less-than-significant level or a statement of overriding considerations is adopted by the decision-making body per CEQA requirements.	The proposed project would involve the removal of giant reed and castor bean within the beds and banks of upper San Antonio, Reeves, Thacher, and McNell Creeks in the Ojai Valley. As addressed in Section B.6 (Biological Resources) the proposed project has been evaluated for its potential impacts on: endangered, threatened and rare species; wetland habitat; coastal habitat; migration corridors; and, locally important species and communities. No significant adverse impacts to these resources would occur. The removal of non-native invasive plant species from the upper San Antonio Creek watershed would result in long-term beneficial impacts, both directly and indirectly, to these resources. The project would be consistent with this policy.
Section 2.1: Geotechnical Hazards	Policy 2: Discretionary development shall be prohibited in seismic and geologic hazard areas (as identified during the environmental review process) where such hazards cannot be mitigated to less-than-significant levels.	As described in Sections B.13 (Seismic Hazards) and B.14 (Geologic Hazards), the project would not necessitate the construction or modification of a building or structure, nor would it require any grading or soil excavation activities. No seismic or geologic hazards would occur as a result of the project, and therefore the project would be consistent with this policy.
Section 2.4: Noise Hazards	Goal 2: Separate and/or buffer noise sensitive uses from noise generating uses.	As addressed in Section B.19 (Noise and Vibration), implementation of Mitigation Measures N-1, N-2, N-3, and N-7 though N-9 would separate and/or buffer sensitive receptors from the noise generated by the proposed project. All noise-related impacts can be mitigated to a level of less than significant and would be temporary in nature. The project would be consistent with this goal.
	Policy 1: Discretionary development which would create significant noise impacts shall not be permitted to locate near residences and other noise sensitive uses (dwellings, schools, hospitals, nursing homes, churches and libraries) unless the impact is mitigated to an insignificant level, as defined in Section 2.16.2.1(4) of the Countywide General Plan.	As discussed in Section B.19 (Noise and Vibration), the short-term noise impacts associated with the proposed project can be mitigated to a level of less than significant through implementation of Mitigation Measures N-1 through N-9. Due to the temporary nature of the project (initial giant reed removal followed by monitoring and re-treatments, as needed, up to four times annually through 2012), no long-term, permanent noise impacts would occur. The project would be consistent with this goal.
Section 4.4: Flood Control and Drainage Facilities	Goal 1: Provide and adequately maintain flood control and drainage facilities as necessary for the protection of life and property.	The project would reduce flood hazards by removing giant reed and allowing for the reestablishment of native riparian vegetation. The project would be consistent with this goal.
Section 4.7: Parks and Recreation	Policy 1: Discretionary development near existing trails shall be conditioned to mitigate or avoid adverse impacts to the existing trail system.	As described in Section B.30C (Regional Trails/Corridors), the nearest trail to the project area is Horn Canyon Trail, which would not be affected by project activities. The project would be consistent with this policy.

General Plan Section	Policy or Goal	Consistency Assessment
City of Ojai General Plan		
Air Quality Element (May 1993) Particulate and Building Emissions	Policy 2: Construction-related emission thresholds should be limited to 2.5 tons of PM_{10} per three-month period.	Implementation of the proposed project's initial phase, under which the most intensive construction-related activity would occur, is anticipated to be completed within an eight week (or 35 to 40 day) period. During this phase, daily PM_{10} emissions are estimated to be 1.27 pounds per day (see Table B.3-3). Therefore, the proposed project would be consistent with this policy.
	Policy 3: To the extent possible, the City shall enforce the following at construction sites to reduce fugitive dust emissions: - require trucks hauling soil, dirt, or other emissive materials to cover their loads - require grading to occur only when wind conditions do not exceed 30 miles per hour - enclose, cover, water when necessary, or apply approved soil binders, according to manufacturers specifications, to exposed stock piles, i.e., gravel, sand, dirt - require the installation of truck wheel washers and other types of barriers at construction sites to prevent the transport of soil onto public rights-of-way	As addressed in Section B.3 (Air Quality), project-related vehicular activity would be limited to paved surfaces and road shoulders, and removal activities would not include any subsurface disturbances. Therefore, impacts associated with fugitive dust emissions would be less than significant and no mitigation measures warranted. The proposed project would be consistent with this policy.
Noise Element (November 26, 1991)	Policy 3: The City shall incorporate noise reduction features during site planning to mitigate anticipated noise impacts on affected noise sensitive land uses. New development should be permitted only if appropriate mitigation measures are included such that the standards contained in this Element or adopted ordinances are met.	As addressed in Section B.19 (Noise and Vibration), implementation of Mitigation Measures N-1 through N-9, in conjunction with Mitigation Measures AQ-1 and T-1, would reduce noise-related impacts associated with the proposed project to a level of less than significant. Additionally, the proposed project would be temporary in nature (initial giant reed removal followed by monitoring and re-treatments, as needed, up to four times annually through 2012), and would not involve any development. The project would be consistent with this policy.
	Policy 6: The City should discourage nighttime traffic, particularly truck traffic, on streets in residential areas.	As addressed in Section A.7 (Project Description), the proposed project does not involve any nighttime activities. Therefore, the project would be consistent with this policy.
Safety Element (September 24, 1991) Flood Hazards	Policy 2: Support measures for the abatement of flooding hazards, including but not limited to: *[Parts 1 and 2 not applicable]* (3) debris clearance and silt removal programs conducted by Ventura County Flood Control District in a manner so as not to disrupt existing riparian communities to the extent feasible.	The project is proposed by the VCWPD in order to reduce flood hazards and restore biological habitat. By removing stands of giant reed, which can divert water flow and cause bank erosion in the upper San Antonio Creek watershed, the project would allow for the reestablishment of native riparian vegetation. The project would be consistent with this policy.
Conservation Element (May 13, 1987)	*Water/Watersheds* Policy: The City shall strive to protect natural watersheds, drainage beds and water recharge areas and rebuild those damaged to achieve recovery of local water and the preservation of water systems.	The proposed project would remove giant reed and castor bean from portions of the upper San Antonio Creek watershed, which would serve to improve water quality, as well as enhance water supply reliability and groundwater recharge (see Section B.4 [Water Resources]). The project would be consistent with this policy.

General Plan Section	Policy or Goal	Consistency Assessment
	Biological Resources Policy: Identify and protect biological resources within the City and its Area of Interest.	As addressed in Section B.6 (Biological Resources), the proposed project would not result in any significant and unavoidable impacts to biological resources. The removal non-native invasive plant species from the upper San Antonio Creek watershed would result in long-term beneficial impacts, both directly and indirectly, to biological resources. The project would be consistent with this policy.
	Biological Resources Policy: It shall be the policy of the City of Ojai to allow no loss of existing resource value for rare, endangered and unique species habitat, except to provide for the maintenance of flood control facilities.	Special-status species and their habitat have been evaluated in this Initial Study. As addressed in Section B.6 (Biological Resources), no adverse and unavoidable impacts to these resources would occur. Ultimately, the proposed project would enhance and restore the habitat used by special-status species. It is additionally noted that although the proposed project is specific to habitat restoration, the removal of giant reed from the subject creeks would reduce flood hazards both within the upper San Antonio Creek watershed and downstream in the Ventura River watershed, as addressed in Section B.15 (Hydraulic Hazards). The project would be consistent with this policy.
	Biological Resources Policy: The City shall allow no loss of the existing resource value or regionally significant riparian habitat.	The removal of highly invasive non-native plant species from the proposed project area would result in the long-term restoration and enhancement of habitat within the upper San Antonio Creek watershed. No loss of regionally significant riparian habitat would occur; potential impacts would be beneficial. The proposed project would be consistent with this policy.

Source: County of Ventura, 2005b and 2005c; City of Ojai, 1987, 1991a, 1991b, and 1993.

The analyses for other resource-specific environmental issues addressed in Sections B.2 through B.30 of this Initial Study conclude that no impact, less than significant impacts, or impacts that can be mitigated to a level of less than significant would result from implementation of the proposed project. No significant and unavoidable impacts would occur due to implementation of the project. Impacts that can be mitigated to a level that is less than significant are associated with the following issue areas: Air Quality (Mitigation Measures AQ-1 through AQ-4); Biological Resources (Mitigation Measures B-1 through B-3); Paleontological Resources (Mitigation Measure P-1); Cultural Resources (Mitigation Measure C-1); Noise and Vibration (Mitigation Measures N-1 through N-9); Transportation/Circulation (Mitigation Measures T-1 through T-2); and, Recreation (Mitigation Measures R-1 through R-2). Based on the conclusions of these resource-specific analyses of this Initial Study, the proposed project would be considered consistent with the Ventura County's *General Plan* and *Ojai Valley Area Plan*, and Ojai's *General Plan*. No impacts would occur.

Cumulative Impacts. As addressed in the Ventura County *Initial Study Assessment Guidelines*, a cumulative impact refers to an adverse change to the environment that results from the incremental effect of a proposed project when added to the effects of other closely related past, present and reasonably foreseeable future projects (County of Ventura, 2006). "Related" means that the other projects would have an adverse impact on one or more of the same specific environmental resources or subject areas as the proposed project (County of Ventura, 2006).

As noted in Section A.8 of this Initial Study, the proposed project area is primarily made up of semi-rural and rural land uses, with the exception of the City of Ojai. Outside of Ojai, the majority of past and present projects in the proposed project area have included agricultural development, single-family residential development, private institutional development, and limited amounts of commercial, business, and industrial development. Ojai itself is urban to semi-urban in character, with past and present development projects ranging from single and multi-family residential housing to numerous types of private mixed-use, commercial, business and light industrially-related uses; public facility and infrastructure development projects within the City of Ojai have been implemented as well. At a resource/issue-specific area, Sections B.2 through Section B.30 of this Initial Study provide a description of the project area's existing conditions, including those conditions that have been caused by past and present projects.

Appendix 2 of this Initial Study provides listings of recently approved and pending development projects within both the Ojai planning area of Ventura County and the City of Ojai. Within the Ojai planning area of Ventura County there are five recently approved and 12 pending development projects. Of these projects, six pending and four approved projects are located within an approximate five-mile radius of the proposed project area. The approved projects include permitting of an unpermitted auto repair and sales business, conversion of an existing gas station's service bay to a mini-mart, modifications to an existing Conditional Use Permit (CUP) for oil and gas development, and continued operation of an existing private school for pre-school (the Monica Ros School) through 3rd grade students (Project Numbers 1, 2, 3 and 5, respectively, of the summary table of recently approved and pending development projects for the Ojai planning area [please refer to Appendix 2]). The pending projects involve issuance a new CUP for an expired telecommunications tower CUP, a Planned Development Permit to re-establish an existing restaurant as a "Retail, Eating Establishment," construction of a hay barn, construction of a one-room addition to a residential home, and two subdivisions (Project Numbers 9, 11, 12, 14, 16 and 17, respectively, of the summary table of recently approved and pending development projects for the Ojai planning area [please refer to Appendix 2]).

Within the City of Ojai, recently approved projects primarily include upgrades, remodeling and additions to existing residential homes and institutional, commercial and business establishments; additional discretionary projects that have either been approved or are pending approval include the construction and operation of commercial, retail, mixed-use and residential development. Please refer to Appendix 2 for a listing of these pending and recently approved projects.

Implementation of the above-referenced recently approved and pending projects may cause adverse environmental effects. Although the breadth of these effects cannot be predicted with absolute certainty, given their nature the primary impacts associated with their implementation would be anticipated to include air quality, geology and soils, noise and vibration, public services and utilities, transportation and circulation, and, possibly, biological resources, water quality and supply, land use and agricultural resources.

As addressed in Initial Study Sections B.3, B.6, B.19, B.22 and B.30, implementation of the proposed project would result in adverse impacts to air quality, biological resources, noise and vibration, transportation and circulation, and recreation, respectively. Although unlikely, implementation of the proposed project could also potentially affect paleontological resources (Initial Study Section B.9) and cultural resources (Initial Study Section B.10). However, all potential impacts associated with the

proposed project would be temporary in nature and can be mitigated to a level of less than significant; all long-term impacts associated with the proposed project would be beneficial. With application of the mitigation measures identified in this Initial Study (Mitigation Measures AQ-1 through AQ-4, P-1, C-1, N-1 through N-9, T-1 through T-2 and R-1 through R-2), the proposed project would not conflict with adopted General Plan/Area Plan environmental goals and policies of the County of Ventura or City of Ojai. Therefore, as related to inconsistencies with adopted General Plans and Area Plans, the proposed project would not incrementally combine with other past, present and reasonably foreseeable projects in a manner that would be cumulatively considerable. No cumulative impacts would occur.

B.2 LAND USE

The proposed project area is located in the Ojai Valley and is characterized by a rural setting that is composed primarily of citrus orchards. Residential neighborhoods are scattered among the area's many ranches. Several non-residential and agricultural uses occur in the proposed project area as well (Aspen Environmental Group, 2008), including:

- **Educational Facilities:** Proposed project activities would be located in the vicinity of four public and private educational facilities. Please refer to Initial Study Section B.29 for a full discussion of schools located within the proposed project area.
- **Recreation Areas:** Proposed project activities would be located within Soule Park, adjacent to Soule Park Golf Course. Please refer to Initial Study Section B.30 for a full discussion of recreational facilities in the proposed project area.
- **St. Joseph's Health and Retirement Center:** Located at 2464 East Ojai Avenue, this health and retirement center is approximately 640 feet west of proposed removal activities along Thacher Creek (Hospitaller Brothers of St. John of God, 2008).
- **Meditation Mount:** Located at 10340 Reeves Road, this meditation and retreat center is approximately one-half mile east of proposed removal activities along Reeves Creek (Meditation Mount, 2008).

B.2A Community Character

Proposed Project Impacts. Community character refers to the distinctive physical quality, attributes, or features of a community that sets it apart from other communities or areas. According to the Ventura County *Initial Study Assessment Guidelines*, any project that is consistent with both the zoning and the General Plan land use would have a less than significant impact on the land use of an area (County of Ventura, 2006).

As described in the *Ojai Valley Area Plan*, the predominant land use designation of the project area is Open Space (OS [20, 40, and 80 acre minimum]), while others within or adjacent to the project area include Rural Residential (RR 2 [2 to 5 acre minimum] and RR 5 [5 to 10 acre minimum]), Urban Residential (UR 2-4 [2 to 4 dwelling units per acre], and Rural Institutional (RI [20 acre minimum]) (County of Ventura, 2005a). Portions of Reeves, Thacher, and upper San Antonio Creeks are additionally designated as Sensitive Biological Areas (County of Ventura, 2005a). Although there is no published zoning designation map for the project area (County of Ventura, 2008), General Land Use Policy 1 of the *Ojai Valley Area Plan* requires the zoning for any given parcel to be consistent with its respective General Plan land use designation, as well as the County's "Zoning Compatibility Matrix" (County of Ventura, 2005a). Consistent with these requirements, it is reasonably assumed that the zoning designations associated with the project area include: Open Space (O-S [10 Acre Minimum]);

Agriculture Exclusive (A-E [40 Acre Minimum]); Rural Agriculture (R-A [1 Acre Minimum]); Rural Exclusive (R-E [10,000 Square Feet Minimum]); Single-Family Estate (R-O [20,000 Square Feet Minimum]); Single-Family Residential (R-1 [6,000 Square Feet Minimum]); R-2 (Two-Family Residential [3,500 Square Feet Minimum]); and, potentially, Timberland Preserve (T-P) (County of Ventura, 2005a and 2005b).

The proposed project would not require the construction or removal of structures, nor would it involve any grading, excavation, or other soil removal activities that may affect the community character of the project area. As such, project activities would not conflict with land use or zoning designations. Furthermore, as outlined in Table B.1-1, the proposed project would be consistent with applicable County of Ventura and City of Ojai land use plans, goals, and policies.

Temporary impacts to community residents may result from increased air quality emissions, noise and traffic during the giant reed and castor bean removal and chipping. However, proposed project activities would be temporary, and would not permanently affect the character of the surrounding communities. In addition, Mitigation Measures AQ-1 through AQ-4, as introduced in Section B.3 (Air Quality), Mitigation Measures N-1 through N-9, as provided in Section B.19 (Noise and Vibration), and Mitigation Measures T-1 though T-2, as described in Section B.22 (Transportation/Circulation) would reduce adverse effects of the proposed project on surrounding land uses. Additionally, the proposed project would be consistent with zoning and General Plan land use designations within the project area. Therefore, the proposed project would have a less than significant impact on community character.

Cumulative Impacts. Initial Study Section B.1, as supported by Appendix 2, provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. As implemented, these projects may create adverse impacts to community residents from increased air quality emissions, noise and traffic. However, the air quality, noise and traffic impacts associated with the proposed project would be temporary in nature and can be mitigated to a level of less than significant. Therefore, as related to community character, the proposed project would not incrementally contribute to impacts in a manner that would be cumulatively considerable. No cumulative impacts would occur.

B.2B Housing

Proposed Project Impacts. Any project that would remove existing housing or introduce a new demand for housing could potentially create a significant impact (County of Ventura, 2006). The proposed project would neither remove existing housing, nor prevent the future construction of homes in the project area. While the proposed project would require approximately 10 workers for initial removal activities, and up to 12 workers for prescribed re-treatment activities, this small workforce would be anticipated to come from the Ventura County area. Consequently, the workforce needed would be expected to be available within a reasonable commuting distance of the proposed project area, and thus would not result in a demand for additional housing. No impacts to housing would occur.

Cumulative Impacts. Initial Study Section B.1, as supported by Appendix 2, provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. As addressed above, the proposed project would not affect housing. Consequently, it would not

incrementally contribute to housing impacts that would be cumulatively considerable. No cumulative impacts would occur.

B.2C Growth Inducement

Proposed Project Impacts. Growth inducement refers to an action that would eliminate or remove an impediment to growth in an area, which may include physical or policy impediments (County of Ventura, 2006). The proposed project is a restoration project that would benefit the area by improving aquatic and terrestrial habitat, reducing flood hazards and fire risks, improving water quality, and enhancing water supply reliability and groundwater recharge. None of the proposed project's activities would result in, or necessitate the expansion of, critical public facilities, such as roads, water supply, sewers, or flood control facilities. As described in Sections B.1 (General Plan/Area Plan Environmental Goals and Policies) and B.2A (Community Character), the proposed project would be consistent with zoning and General Plan land use designations within the project area, and would not require an amendment to an adopted County of Ventura or City of Ojai policy that may accommodate future growth. Consequently, the proposed project would have no impacts associated with growth inducement.

Cumulative Impacts. Initial Study Section B.1, as supported by Appendix 2, provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. As addressed above, the proposed project would not be growth inducing. Consequently, it would not incrementally contribute to growth inducing impacts that would be cumulatively considerable. No cumulative impacts would occur.

B.3 AIR QUALITY

Air Quality Standards. Ambient air quality is determined by comparing contaminant levels in ambient air samples to national and State standards. These standards are set by the United States Environmental Protection Agency (USEPA) and the California Air Resources Board (CARB) at levels determined to be protective of public health and welfare with an adequate margin of safety. National Ambient Air Quality Standards (NAAQS) were first established by the federal Clean Air Act of 1970. California Ambient Air Quality Standards (CAAQS) were established in 1967. An area with air quality continuously below or equal to these standards is designated as being in attainment. California standards are generally more stringent than national standards.

Air quality standards specify the upper limits of concentrations and duration in the ambient air consistent with the management goal of preventing specific harmful effects. There are federal and State standards for ozone, carbon monoxide (CO), nitrogen dioxide (NO_2), airborne particulate matter with an aerodynamic diameter of less than ten and two and one-half microns (PM_{10} and $PM_{2.5}$, respectively), and sulfur dioxide (SO_2). These are "criteria pollutants." The federal and State Ambient Air Quality Standards for these pollutants are shown in Table B.3-1.

Table B.3-1 National and California Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards*	National Standards*
Ozone	1 hour 8 hours	0.09 ppm 0.07 ppm	-- 0.075 ppm
Respirable Particulate Matter (PM_{10})	24 hours Annual Mean	50 µg/m^3 20 µg/m^3	150 µg/m^3 —
Fine Particulate Matter ($PM_{2.5}$)	24 hours Annual Mean	— 12 µg/m^3	35 µg/m^3 15 µg/m^3
Carbon Monoxide (CO)	1 hour 8 hours	20 ppm 9.0 ppm	35 ppm 9.0 ppm
Nitrogen Dioxide (NO_2)	1 hour Annual Mean	0.18 ppm 0.03 ppm	— 0.053 ppm
Sulfur Dioxide (SO_2)	1 hour 24 hours Annual Mean	0.25 ppm 0.04 ppm —	— 0.14 ppm 0.03 ppm

* ppm = parts per million; µg/m3 = micrograms per cubic meter; "—" = no standard.
Source: CARB Ambient Air Quality Standards Chart, 2008.

Attainment Status. Ventura County is designated by the USEPA and CARB as a nonattainment area for ozone; it is also designated as nonattainment by CARB for PM_{10}. Table B.3-2 provides the attainment status for all criteria pollutants in Ventura County.

Table B.3-2 Attainment Status for Ventura County

Pollutant	Federal Designation	State Designation
Ozone	Serious Nonattainment (8-hr)	Severe Nonattainment (1-hr)
PM_{10}	Attainment	Nonattainment
$PM_{2.5}$	Attainment	Attainment
CO	Attainment	Attainment
NO_2	Attainment	Attainment
SO_2	Attainment	Attainment

Source: CARB, 2008; USEPA, 2008a.

Air Quality Plans, Policies, and Regulations. The Ventura County Air Pollution Control District (APCD) implements, and periodically updates, the Ventura County *Air Quality Management Plan* (*AQMP*). The *AQMP* uses projections of population growth and trends in energy and transportation demand to predict future emissions and determine control strategies to eventually achieve attainment with the ambient air quality standards. The control strategies are then either codified into the Ventura County APCD's rules and regulations, or otherwise set forth as formal Ventura County APCD recommendations to other agencies.

The Ventura County *General Plan* includes policies that require consistency with the *AQMP*, and specifies review according to the recommendations contained in the Ventura County APCD's *Air Quality Assessment Guidelines*. Other policies are aimed at reducing emissions from transportation demand and major stationary sources. This air quality analysis has been prepared in accordance with the recommendations of the Ventura County APCD's *Air Quality Assessment Guidelines*; consequently, its consistency with the air quality policies of the Ventura County *General Plan* is assured.

The Ventura County APCD rules and regulations contain both requirements and exemptions for certain types of equipment that may be used during implementation of the proposed project. Equipment with small internal combustion engines (under 50 horsepower) would be exempt from permitting through Ventura County APCD Rule 23-D. Similarly, dust emissions from mobile equipment that may occur would be exempt under Ventura County Rule 23-B. Ventura County APCD Rule 74-9 contains limitations for larger, stationary internal combustion engines (greater than 50 horsepower) if they are operated for more than one year. However, within the context of the proposed project, use of these types of engines would not occur for more than a few weeks; thus, these Ventura County APCD limitations would not be applicable. Nuisances from either dust or emissions of other contaminants are distinctly prohibited by Ventura County APCD Rule 51.

Air Quality Significance Criteria. The Ventura County Air Pollution Control Board adopted the Ventura County APCD *Air Quality Assessment Guidelines* with technical revisions in 2003 (VCAPCD, 2003). Using these *Guidelines* and the State *California Environmental Quality Act (CEQA) Guidelines*, an air quality impact would be significant if it would:

- Conflict with or obstruct implementation of the Ventura County AQMP;
- Violate any air quality standard or contribute to an existing or projected air quality violation;
- Result in a cumulatively considerable net increase of any criteria nonattainment pollutant;
- Expose the public (especially schools, day care centers, hospitals, retirement homes, convalescent facilities, and residences) to substantial pollutant concentrations;
- Create objectionable odors affecting a substantial number of people; or,
- Create a significant San Joaquin Valley Fever impact.

In addition to the above, within the County's Ojai Planning Area a net increase of ozone precursors (a nonattainment pollutant) of five pounds per day of reactive organic compounds or gases (ROCs or ROGs) or oxides of nitrogen (NO_x) is considered substantial. However, this Ventura County APCD significance threshold is not applicable to construction equipment emissions since such emissions are temporary in nature.

B.3A Regional

Proposed Project Impacts. Implementation of the proposed project would result in short-term exhaust emissions and fugitive dust generated by the small mechanical removal equipment that would be used for giant reed and castor bean removal, the chippers that would be used to break down the removed biomass, and motor vehicles (for both the transport of the cut biomass material and the workforce needed for implementation of the project).

As addressed in Section A.7 (Project Description), initial removal activities would be completed over an estimated 35 to 40 working days. Normal working hours would be Monday through Friday from 7:00 a.m. to 5:00 p.m. The initial herbicide applications would be completed by two crews of approximately five workers each. The crews would typically work in the same vicinity, and would normally be located between an estimated 500 feet to 0.25 mile of each other. During this phase, no heavy equipment would be required and no sub-surface disturbances would occur. The "cut and daub" treatment would involve equipment such as hand-held loppers, chain-saws and power brush cutters (both powered on gasoline) to remove over 95 percent of the giant reed and castor bean. The remaining

giant reed (less than five percent) would be removed using a foliar spray treatment. A glyphosate-based herbicide, such as Aquamaster® with a colorant, such as Blaz-on®, would be applied by painting the cambium layer of the freshly cut stalks with a cloth-covered wand or sponge. The herbicide and surfactants proposed for use do not contain volatile organic compounds.

Upon completion of the initial herbicide application, cut plant material would be removed either by hand or with a small loader to a haul truck, which would be parked at the closest point of a road that provides access to the targeted removal site. A medium size haul truck would then transport the cut plant material in loads of approximately three to seven cubic yards to a chipping site in Soule Park. It is estimated that approximately 1,000 cubic yards of un-chipped plant material would be transported to the Park. Chipping would occur approximately every seven to ten calendar days. One to two chippers would be used; when in use, they would normally be operated for five to six hours per day.

For the purposes of this analysis, vehicle emissions were estimated using the 2009 emissions factors recommended by the South Coast Air Quality Management District (SCAQMD) in its updated *CEQA Air Quality Handbook* (SCAQMD, 2008), and from the USEPA's *Compilation Air Pollutant Emissions Factors* (Volume 1, Stationary Sources, Section 13.2.1) (USEPA, 2008b). Appendix 3 of this Initial Study provides the assumptions that were used for this air quality impact analysis.

Emission estimates for the proposed project's different emissions sources are shown in Table B.3-3. A maximum of two gasoline fueled chainsaws and power cutters would be operated per crew for the giant reed and castor bean removal. One small loader per crew would be used for two hours per day to transport the cut biomass from the removal area to the haul truck. As a "worst-case" scenario, maximum emissions reflect four hours of chainsaw and power cutter operation, two hours of Small loader operation, and, six hours of chipper operation. Since the amount of castor bean that would be removed is not expected to be a significant amount of the total biomass removed, the emissions from castor bean removal are not estimated separately. The emissions from workers commuting are based on ten workers and thirty miles per roundtrip commuting per day. The emissions from transporting cut giant reed are based on an average of five trips per day for transporting the cut plant material; the average round trip distance between the targeted removal site and the chipping area is estimated to be eight miles.

Table B.3-3 Summary of Emission Estimates for Mechanical Removal Equipment (Pounds per Day)

	THC/ROCs	NOx	SOx	CO	PM_{10}	CO_2
Chainsaw	1.023	0.042	---	3.503	0.006	9.467
Power Cutter	0.511	0.021	---	1.751	0.003	4.734
Chipper	1.861	10.91	0.010	6.005	0.998	831.4
Small Loader (50 hp)	0.836	12.87	0.002	2.211	0.202	181.8
Workers Commuting	0.298	0.302	0.003	2.906	0.026	329.3
Transporting Cut Giant Reed	0.112	0.895	0.001	0.806	0.032	108.9
Total Emissions	4.689	14.117	0.017	17.647	1.271	1518.3

The proposed project's ROC and NO_X emissions would temporarily contribute to existing violations of the State and federal ozone standards, while PM_{10} and $PM_{2.5}$ generated by travel on paved roads would contribute to existing violations of the State's PM_{10} standards on a temporary basis. Short-term NO_X emissions would exceed the five pound per day significance threshold established by the Ventura

County APCD for the Ojai Planning Area. However, construction-related emissions of ROC and NOx are not counted towards the significance thresholds since these emissions are temporary (VCAPCD, 2003). Dust emissions would only be considered significant if the Ventura County APCD's Rule 51 is violated, meaning that a nuisance would occur. Additionally, uncontrolled (e.g., un-mitigated) construction activity would not be consistent with the region-wide control strategies recommended by the Ventura County APCD. These strategies require that mitigation measures, when feasible, be applied to a project to make its implementation (e.g., construction) consistent with the Ventura County APCD's recommendations and minimize its direct temporary impacts, or contribution, to regional air pollution.

Incorporating mitigation measures for emissions as they relate to the equipment listed in Section 7.4.3 of the Ventura County APCD's *Air Quality Assessment Guidelines* and the Ventura County APCD's recommendations to the VCWPD would reduce the impacts of the proposed project to a level of less than significant:

MM AQ-1 All equipment shall be turned off when not in use. Engine idling shall not exceed five (5) minutes unless required for proper operation.

MM AQ-2 Maintain equipment engines in good operating condition and in proper tune per manufacturers' specifications.

MM AQ-3 Use either new equipment that meets the recent California Air Resources Board's engine emission standards, or alternatively fueled construction equipment, such as compressed natural gas, liquefied natural gas, or electric, if feasible.

MM AQ-4 All project construction and site preparation operations shall be conducted in compliance with all applicable Ventura County Air Pollution Control District Rules and Regulations, with emphasis on Rule 50 (Opacity), Rule 51 (Nuisance) and Rule 55 (Fugitive Dust).

The initial phase of the proposed project would be expected to occur in the fall of 2009, and may include activities during October, which coincides with the end of the peak ozone season, or "smog season" as referenced in the Ventura County APCD's *Air Quality Assessment Guidelines*; the "smog season" extends from May through October (VCAPCD, 2003). Consequently, implementation of the fourth mitigation measure contained in the Ventura County APCD's *Air Quality Assessment Guidelines*, which recommends lengthening the construction period of a project during the "smog season" to minimize the number of vehicles and equipment operating at the same time, may not be feasible in the month of October. However, as addressed above, the magnitude of the project's initial implementation activities would be relatively small and their duration would not be expected to exceed eight weeks total (35 to 40 working days). As such, with implementation of Mitigation Measures AQ-1 through AQ-4, associated impacts during the "smog season" would be considered less than significant.

Following the initial herbicide treatment, a prescribed re-treatment would be undertaken in those areas where giant reed re-emerges. Depending on site-specific conditions, the re-treatment could occur up to four times annually. It is currently anticipated that re-treatments would continue through 2012. The type of herbicide application used for the initial treatments would typically be used for re-treatments. Emissions from re-treatment would be negligible. Impacts would be less than significant or none.

In addition to the above, the proposed project would be considered inconsistent with applicable air quality plans if it would either result in a population and/or employment growth that exceeds the growth estimates included in the Ventura County *AQMP*, or if it would require a Ventura County *General Plan* amendment to increase projected and planned population or employment growth. The proposed project would not create any new full-time positions of employment; additionally, it would likely be implemented by a workforce that is completely resident to Ventura County. Consequently, no population or employment growth would be generated by the proposed project, and no obstructions of, or inconsistencies or conflicts with, the Ventura County *AQMP* would occur.

Cumulative Impacts. The proposed project area is mainly open space, punctuated by rural residential, agricultural and institutional uses. As indicated in Section B.1 of this Initial Study, as supported by Appendix 2, there are no major development projects (past, present, pending or recently approved) that would have significant air emissions within the same timeframe as implementation of the proposed project. In addition, the proposed project would not generate any emissions after approximately 2012 and all short-term impacts can be mitigated to a level of less than significant. Therefore, as related to regional air quality impacts, the proposed project would not combine with other past, present and reasonably foreseeable projects in a manner that is cumulatively considerable. Cumulative air quality impacts would be less than significant.

B.3B Local

Within the proposed project area, non-native vegetation removal activities would occur along McNell, Thacher, and Reeves Creeks, and that segment of upper San Antonio Creek which is located within and north of Soule Park and Soule Park Golf Course. Outside of the City of Ojai, land uses are predominantly semi-rural and rural in nature, including agriculture, single family residential homes, and private institutions. Within the City of Ojai and the communities of Meiners Oaks, Mira Monte, Live Oak Acres and Oak View, land uses are semi-urban to urban in nature, including commercial and services centers, offices, public schools and facilities, and residential development.

Proposed Project Impacts. Localized project impacts may be experienced by receptors sensitive to air pollution. Such receptors include certain types of residents, such as the very young, the elderly, and those suffering from respiratory illnesses or disabilities. Examples of land uses where significant numbers of sensitive individuals are often found include schools, parks, medical and retirement facilities and residential homes.

Fugitive dust and equipment emissions generated during the mechanical removal and transport of biomass, the application of herbicides, and chipping may create temporary nuisances. Nearby sensitive receptors would experience increased concentrations of combustion-related pollutants during the project's initial giant reed removal activities. However, the impacts associated with these activities would be temporary in nature, and implementation of Mitigation Measures AQ-1 through AQ-4, as outlined above in Section B.3A, would ensure that these emissions would be managed in a manner consistent with Ventura County APCD's recommendations. Sensitive receptors would, therefore, not be exposed to substantial pollutant concentrations. Impacts to sensitive receptors would be less than significant.

It is not anticipated that the cut stalks and chipped giant reed would create any odors, since the stockpiles would not stay on site long enough to generate any decomposition. In the unlikely event that

decomposition starts to occur, the stockpiles would be spread out to slow down the decomposition process. Removal of castor bean would also have the potential to generate odors. However, the volume of castor bean that may be removed would not be large; therefore, any impacts resulting from castor bean decomposition odors are anticipated to be less than significant or none.

As addressed in Section A.7 (Project Description), the proposed project would not involve grading or subsurface disturbances. Therefore, the proposed project would not result in impacts associated with San Joaquin Valley Fever.

Greenhouse Gas Impacts. Greenhouse gases (GHGs) are defined as any gas that absorbs infrared radiation in the atmosphere. Common GHGs include water vapor, carbon dioxide (CO_2), methane, nitrous oxide (N_2O), chlorofluorocarbons (CFCs), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF_6), ozone and aerosols (Hendrix, Wilson, et al., 2007). GHGs are emitted by both natural processes and human activities, and lead to the trapping and buildup of heat in the atmosphere near the earth's surface, commonly known as the "Greenhouse Effect." There is increasing evidence that GHGs and the Greenhouse Effect are leading to global warming and climate change (USEPA, 2007). "The potential adverse impacts of global warming include the exacerbation of air quality problems, a reduction in the quality and supply of water to the State from the Sierra snowpack, a rise in sea levels resulting in the displacement of thousands of coastal businesses and residences, damage to marine ecosystems and the natural environment, and an increase in the incidences of infectious diseases, asthma, and other human health-related problems" (California Health & Safety Code, Division 25.5, Part 1). The primary source of GHGs in the United States is energy-use related, primarily including activities involving fuel combustion.

In 2006, in response to concerns related to global warming and climate change, the California State Legislature adopted Assembly Bill 32 (AB 32), the "California Global Warming Solutions Act of 2006." AB 32 focuses on reducing GHGs in California and requires CARB, the State agency charged with regulating statewide air quality, to adopt rules and regulations that would achieve GHG emissions equivalent to State-wide levels in 1990 by 2020 (Hendrix, Wilson, et al., 2007). In addition, two State-level Executive Orders have been enacted by the Governor (Executive Order S-3-05, signed June 1, 2005, and Executive Order S-01-07, signed January 18, 2007) that mandate reductions in GHG emissions.

Currently there are no adopted thresholds of significance or specific methodologies established for determining impacts related to a project's potential contribution to global climate change in CEQA documents. However, within the context of CEQA, it is generally accepted that a single small project does not typically generate enough GHG emissions to significantly influence global climate change (Hendrix, Wilson, et al., 2007). As such, it has been recommended that global climate change be addressed within the context of cumulative impacts until further guidelines, methodologies and thresholds of significance are established (Hendrix, Wilson, et al., 2007). Under the proposed project, a very small amount of GHG emissions, as compared to State-wide totals, would be emitted temporarily during project implementation (please refer to Appendix 3 for an estimate of the project's CO_2 emissions). However, little or no long-term GHG emission increases would result from the proposed project. Additionally, the proposed project, which is specific to the long-term removal of giant reed and

castor bean, would not facilitate any local or regional population growth that could increase GHG emissions. Consequently, no GHG impacts would occur.

Cumulative Impacts. Section B.1 of this Initial Study, as supported by Appendix 2, provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. Within the proposed project area, there are no major development projects (past, present, pending or recently approved) that would be expected to have significant air emissions within the same timeframe as implementation of the proposed project. In addition, the proposed project would not generate operational or on-going emissions after approximately 2012. As noted above, the proposed project's emissions can be mitigated to a level of less than significant and would be short-term in duration. Therefore, as related to local air quality impacts, it would not combine with other past, present and reasonably foreseeable projects in a manner that is cumulatively considerable. The proposed project's incremental contribution to cumulative air quality impacts would be less than significant.

B.4 WATER RESOURCES

B.4A Groundwater Quantity

Proposed Project Impacts. Groundwater is water that occurs beneath the land surface and fills the pore spaces of the alluvium, soil, or rock formation within which it is situated (Department of Water Resources [DWR], 2008). As described in the Ventura County *Initial Study Assessment Guidelines*, a project that requires groundwater extraction may significantly impact groundwater quantity (County of Ventura, 2006).

The proposed project would not extract groundwater. Proposed project activities include the removal of giant reed, which consumes more water than native riparian vegetation. Removal of giant reed would thus be expected to slightly increase the amount of recharge to the Ojai Valley groundwater basin, which is the local aquifer associated with the proposed project area (VCWPD, 2005). As such, the project is anticipated to have a beneficial effect on groundwater resources. No adverse impacts to groundwater quantity would occur.

Cumulative Impacts. Initial Study Section B.1, as supported by Appendix 2, provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. As discussed above, the proposed project would not extract groundwater, and would likely enhance recharge to the Ojai Valley groundwater basin. As such, it would not combine with other past, present or reasonably foreseeable projects to contribute to a groundwater quantity impact that would be cumulatively considerable. No cumulative impacts would occur.

B.4B Groundwater Quality

Proposed Project Impacts. According to the Ventura County *Initial Study Assessment Guidelines*, any land use proposal that would, individually or cumulatively, degrade the quality of groundwater and/ or cause groundwater to fail to meet the groundwater quality objectives set-forth by the Los Angeles Regional Water Quality Control Board would be considered to have a potentially significant impact (County of Ventura, 2006).

The proposed project would utilize a glyphosate-based herbicide that has been approved and labeled for use near and in open water. Glyphosate is a non-selective herbicide that readily and completely biodegrades in soil, and has little potential for leaching into groundwater (USEPA, 2006a). The half-life of glyphosate can range between three to 130 days, depending on site-specific soil structure, moisture, and temperature. It dissipates rapidly from the water column as a result of adsorption and possibly biodegradation (USEPA, 2006b). Sediment is the primary sink for glyphosate (USEPA, 2006b). Its half-life in water is estimated to range from a few to 63 days, depending on site-specific conditions (USEPA, 2006b; United States Forest Service, 2002).

It is estimated that over 95 percent of the initial giant reed removal activities would use a "cut and daub" treatment, which would limit the herbicide application directly to the targeted plant material. The remaining giant reed (less than five percent), as well as the opportunistic removal of castor bean, would be treated by foliar spray. The foliar spray treatment would include a surfactant in the herbicide mixture that is approved for use near and in open water. As addressed in Section A.7 (Project Description), all herbicide applications would be completed or supervised by personnel holding either a Qualified Applicator License or a Qualified Applicator Certificate from the California Department of Pesticide Regulation. On-site supervisors would also ensure that the VCWPD's protocols to avoid herbicide drift into adjacent areas are followed and that all product label requirements are implemented. The VCWPD's protocols additionally prohibit foliar spray treatments within 25 feet of surface water. Therefore, impacts to ground water quality would be less than significant.

In addition to the above, the State Water Resources Control Board has issued a Water Quality Certification (WQC) for the proposed project's removal of invasive, exotic plants (permitted under Regional General Permit Number 41 [RGP No. 41]) (please refer to Initial Study Section A.9, Other Agencies Whose Approval May be Required). The State Water Resources Control Board coordinates with and supports the Regional Water Quality Control Board (SWRCB, 2008) and, through its permitting process, ensures consistency with the Regional Water Quality Control Board's groundwater objectives. Consistent with the Matilija Dam Giant Reed Removal Project, the VCWPD would ensure compliance with all stipulations of the RGP during implementation of the proposed project. Therefore, no violations of, or inconsistencies with, the groundwater quality objectives set-forth by the Los Angeles Regional Water Quality Control Board would occur.

Cumulative Impacts. Section B.1 of this Initial Study, as supported by Appendix 2, provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. While no reasonably foreseeable projects would be located directly along upper San Antonio Creek or its tributary creeks, some would be situated within the delineated boundaries of the Ojai Valley groundwater basin (VCWPD, 2005). However, due to their nature, as described in Section B.1, implementation of these projects would not likely affect the quality of the Ojai Valley groundwater basin. In addition, under the proposed project, the VCWPD's protocols for herbicide applications would be applied, and all herbicides and surfactants that may be used would be approved for use near and in open water. Consequently, the proposed project's incremental contribution to groundwater quality impacts would not be cumulatively considerable. Cumulative impacts would be less than significant.

B.4C Surface Water Quantity

Proposed Project Impacts. Any project that would increase the use of surface water in a hydrologic unit that is in overdraft, or cause a hydrologic unit to become overdrafted, would create significant impacts to surface water quantity (County of Ventura, 2006). The proposed project would not increase the net use of surface water in the project area. Proposed project activities would remove giant reed and castor bean along portions of the upper San Antonio Creek watershed. As giant reed consumes more water than native riparian vegetation, its removal is expected to slightly increase the amount of water available for in-stream use. Consequently, the proposed project is anticipated to have a beneficial effect on surface water quantity. No adverse impacts to surface water quantity would occur.

Cumulative Impacts. Initial Study Section B.1, as supported by Appendix 2, provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. As discussed above, the proposed project would not increase the net use of surface water in the proposed project area. Therefore, it would not incrementally contribute to surface water quantity impacts that would be cumulatively considerable. No cumulative impacts would occur.

B.4D Surface Water Quality

Proposed Project Impacts. According to the Ventura County *Initial Study Assessment Guidelines*, any land use or activity that would degrade surface water quality and cause it to fail to meet surface water quality objectives for a hydrologic unit would create a significant adverse impact (County of Ventura, 2006).

The proposed project area is within the Ventura River Watershed, which is managed through a coordinated effort by the Los Angeles Regional Water Quality Control Board and the State Water Resources Control Board (LARWQCB, 2007). As described in Initial Study Section A.9 (Other Agencies Whose Approval May Be Required), the State Water Resources Control Board issued a WQC for the proposed project's removal of invasive, exotic plants (permitted under RGP No. 41) on August 13, 1998. The State Water Resources Control Board coordinates and supports the Regional Water Quality Control Board, and, through its permitting process, ensures consistency with the Regional Water Quality Control Board's surface water objectives. Additionally, consistent with the Matilija Dam Giant Reed Removal Project, the VCWPD would ensure compliance with stipulations of the RGP No. 41 during implementation of the proposed project. Therefore, no violations of, or inconsistencies with, the surface water quality objectives set forth by the Los Angeles Regional Water Quality Control Board would occur.

The glyphosate-based herbicide and surfactant that would be applied have been approved for use near and in open water, and implementation of the project would include adherence to safety measures and manufacturer specifications. Foliar spray treatments within 25 feet of surface water would be prohibited. Proposed project activities would also maximize implementation of a "cut and daub" treatment for initial herbicide applications, which would minimize potential drift. In the long-term, the proposed project would be anticipated to have a beneficial effect on surface water quality because the native plants that would re-colonize the targeted removal areas would be expected to take up nutrients, which would positively affect pollutant loads in surface water. Therefore, potential impacts to surface water quality would be less than significant.

Cumulative Impacts. Section B.1 of this Initial Study, as supported by Appendix 2, provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. None of the reasonably foreseeable projects would be located directly along San Antonio Creek or its tributary creeks (Rand McNally, 2007), and thus would not be expected to affect their respective surface water quality. In addition, under the proposed project, the VCWPD's protocols for herbicide applications would be applied, and an herbicide and surfactant approved for use near and in open water would be used. Therefore, the proposed project's incremental contribution to surface water quality impacts would not be cumulatively considerable. Cumulative impacts would be less than significant or none.

B.5 MINERAL RESOURCES

The California Geological Survey classifies lands according to the presence or absence of significant sand, gravel, or stone deposits that are suitable as sources of aggregate (California Department of Conservation, 2001). These areas are referred to as either a Scientific Resources Zone (SRZ) or a Mineral Resource Zone (MRZ), as follows:

- **SRZ:** A Scientific Resources Zone containing unique or rare occurrences of rocks, minerals, or fossils that are of outstanding scientific significance.
- **MRZ-1:** A Mineral Resource Zone where adequate information indicates that no significant mineral deposits are present or likely to be present.
- **MRZ-2:** A Mineral Resource Zone where adequate information indicates that significant mineral deposits are present, or there is a high likelihood for their presence and development should be controlled.
- **MRZ-3:** A Mineral Resource Zone where the significance of mineral deposits cannot be determined from the available data.
- **MRZ-4:** A Mineral Resource Zone where there is insufficient data to assign any other MRZ designation.

Important mineral resource areas mapped by the State Division of Mines and Geology are depicted as "MRZ-2" within the County of Ventura General Plan Maps (County of Ventura, 2005a).

B.5A Aggregate Resources

Proposed Project Impacts. According to the Ventura County *Initial Study Assessment Guidelines*, if a project is not on or adjacent to land designated MRZ-2, and does not require a CUP for mineral extraction, it would not have a significant impact on aggregate mineral resources (County of Ventura, 2006). The proposed project area and the areas that surround it are not designated MRZ-2 (County of Ventura, 2005b). Furthermore, as discussed in Section A.7 (Project Description), the proposed project would not involve mineral extraction. Therefore, the proposed project would not impact aggregate mineral resources.

Cumulative Impacts. Initial Study Section B.1, as supported by Appendix 2, provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. As addressed above, the proposed project would not impact aggregate resources. Consequently, it would not incrementally contribute to aggregate resources impacts that would be cumulatively considerable. While reasonably foreseeable development projects in the proposed project area would be expected to result in construction that requires aggregate resources, the Ventura County *Initial Study Assessment Guidelines* acknowledge that the aggregate resources supply estimates identified in the Resources

Appendix of the Ventura County *General Plan* are sufficient to meet local demand for the next 50 years (County of Ventura, 2006). Therefore, no cumulative impacts related to aggregate resources would occur.

B.5B Petroleum Resources

Proposed Project Impacts. According to the Ventura County *Initial Study Assessment Guidelines*, if a project is not located on or adjacent to an oil field, or adjacent to a principal access road to an oil extraction CUP, it would not impact petroleum resources (County of Ventura, 2006). As identified in the Resources Element of the Ventura County *General Plan*, there is a small designated area of petroleum extraction located between the reaches of upper San Antonio Creek and Thacher Creek; however, no areas targeted for giant reed removal are located within this designated petroleum extraction area, and no project-related activities would occur within one-half mile of it (County of Ventura, 2005c). Therefore, no impacts to petroleum resources would occur.

Access to any petroleum resources that may be underlying the proposed project area would not be prevented since such resources could be readily extracted through standard drilling techniques from areas adjacent to the targeted creek reaches. Therefore, the proposed project would not result in a loss of availability of a known petroleum resource area that would be of value to the region or the State. No impacts would occur.

Cumulative Impacts. Initial Study Section B.1, as supported by Appendix 2, provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. As addressed in Section B.1, one recently approved project in the proposed project area involves modifications to an existing CUP for oil and gas development. However, as addressed above, the proposed project would not impact petroleum resources, directly or indirectly, and thus would not incrementally contribute to cumulatively significant impacts related to petroleum resources. No cumulative impacts would occur.

B.6 BIOLOGICAL RESOURCES

Consistent with the Ventura County *Initial Study Assessment Guidelines*, this section contains a description of common communities of plants and wildlife, special-status species, and other biological resources unique to Ventura County, and an assessment of the proposed project's potential impacts to these resources (County of Ventura, 2006). As applicable, mitigation measures have been recommended to offset potential adverse impacts to these resources.

Information used in preparing this section was derived from the following data sources:

- *Final Matilija Dam Giant Reed Removal Plan* (County of Ventura, 2007);
- Ventura County *General Plan* (County of Ventura, 2005a);
- Ventura County *Ojai Valley Area Plan* (County of Ventura, 2005b);
- Results of reconnaissance level biological surveys for sensitive vegetation and wildlife in October 2008 and June 2009 (Aspen Environmental Group, 2008 and 2009);
- *San Antonio Creek Watershed Vegetation Mapping Project* (Wildscape Restoration, Inc., 2008);
- The California Department of Fish and Game (CDFG) California Natural Diversity Database – search of United States Geological Survey (USGS) Quads for Ojai, Santa Paula Peak, Santa Paula, Topatopa Mountain, Lion Canyon, Matilija, Saticoy, Ventura, and Wheeler Springs (CDFG, 2008);

- California Native Plant Society (CNPS) *Checklist of Ojai Valley Region Rare Plants* (CNPS, 2008a), *Inventory of Rare and Endangered Vascular Plants of California* (CNPS, 2008b) and *Ojai Valley Region Rare Plants* (CNPS, 2001); and,
- Lists of Locally Important Plants and Animals (County of Ventura, 2008a, 2008b).

Regional Setting

San Antonio Creek is a major tributary of the Ventura River, which is located in western Ventura County, California. Most of its tributaries originate in the Topa Topa Mountains, east of the City of Ojai. The Ventura River watershed is characterized by a semi-arid climate in which precipitation events are of short duration but of moderate to high intensity.

The proposed project area comprises upper San Antonio Creek and its tributaries (McNell, Thacher, and Reeves Creeks), which extend northward from the southwest boundary of Soule Park and Soule Park Golf Course into Los Padres National Forest, northeast and east of the City of Ojai (Figure A.4-1). Elevations range from approximately 100 meters (328 feet) at the southwestern end of the proposed project area (along upper San Antonio Creek) to 425 meters (1,394 feet) along the northeastern extent of Thacher Creek near the boundary of Los Padres National Forest.

Vegetation and Habitat Value

Upper San Antonio creek and its tributaries are generally devoid of quality native habitat as they traverse active agricultural, rural, semi-rural, semi-urban and urban properties. The vegetation communities and giant reed densities within the proposed project area were previously characterized and mapped by Wildscape Restoration, Inc. (Wildscape) in January 2008 (Figure A.7-1). Reconnaissance level surveys of the proposed project area were conducted by Aspen Environmental Group in October 2008 and June 2009 to verify Wildscape's information and provide updated information on habitat, as needed (Aspen Environmental Group, 2008). The vegetation communities and giant reed densities in the proposed project area are generally consistent with the information identified by Wildscape; however, surveyors were unable to relocate a stand of giant reed identified in the upper reaches of Thacher Creek near Thacher School (Figure A.7-1). Habitat types observed within each of the creeks surveyed are described below. Based on the low levels of precipitation recorded in the region prior to the proposed project's October 2008 and June 2009 surveys, with the exception of northern Reeves Creek, surface flows were not present. Turbid ponded water, however, was noted at several locations along Thacher Creek near Thacher School.

Upper San Antonio Creek (Soule Park to State Highway 150). The southern portion of this segment of upper San Antonio Creek is the widest channel of any of the channels observed in the proposed project area. The northern portion of this segment passes through the Soule Park Golf Course. Dominant vegetation communities within the creek bed include mulefat scrub and southern willow scrub. Upland areas are mainly disturbed, resulting in vegetation dominated by shortpod mustard (*Hirschfeldia incana*), California buckwheat (*Eriogonum fasciculatum*), and Peruvian pepper (*Schinus molle*), with occasional mature coast live oak (*Quercus agrifolia*) and California sycamore (*Platanus racemosa*). The southern-most portion of this segment, west of the confluence with Thacher Creek, is characterized by dense stands of mulefat (*Baccharis salicifolia*) and arroyo willow (*Salix lasiolepis*). Giant reed is very dense in this segment of upper San Antonio Creek. Patches of giant reed are also present in the creek as it passes through Soule Park Golf Course. The giant reed density mapping prepared by Wildscape and

presented in Figure A.7-1 of this Initial Study is consistent with the proposed project's October 2008 and June 2009 field observations (Aspen Environmental Group, 2008 and 2009).

McNell Creek. McNell Creek is relatively narrow, highly disturbed, and artificially channelized throughout the majority of the proposed project area. Between its confluence with upper San Antonio Creek and intersection with McNell Road, vegetation is sparse; species present include smilo grass (*Piptatherum miliaceum*), Peruvian pepper, and occasionally coast live oak. East of McNell Road, vegetation is denser, although ruderal, including eucalyptus (*Eucalyptus globulus*). Giant reed is present in McNell Creek beginning near the intersection of Grand Avenue and Carne Road and extending east to Thacher School. The giant reed density mapping completed by Wildscape and presented in Figure A.7-1 is consistent with the proposed project's October 2008 and June 2009 field observations (Aspen Environmental Group, 2008 and 2009).

Thacher Creek. Thacher Creek is the longest tributary in the proposed project area, extending from its confluence with San Antonio Creek, through Soule Park and several orchards and residential areas, to east of Thacher School. Within Soule Park the creek is dominated by arroyo willow and mulefat in the creekbed and mature coast live oak in the adjacent upland areas. East of Soule Park, the creek is artificially channelized with riprap as it passes through residential neighborhoods. This segment is largely devoid of vegetation, with the exception of coast live oak in the adjacent upland areas, and is classified as sparsely vegetated riverwash. East of State Highway 150 to McAndrew Road, the creek channel widens as it passes through several orchards; however, the creek is a concrete channel through most of this segment. Riparian vegetation is highly disturbed and comprised of sparse mulefat scrub with tree tobacco (*Nicotiana glauca*), Peruvian pepper, large castor bean (*Ricinus communis*), and occasional coast live oak in the adjacent upland area. Northeast of McAndrew Road, the channel naturalizes and steadily climbs in elevation; larger boulders are present, indicating periods of heavy flows. The creek's vegetation transitions to southern sycamore/alder riparian woodland, with coastal sage scrub comprising the adjacent upland vegetation community. During the October 2008 biological surveys, turbid ponded water was present in several isolated pools in the creekbed east of Thacher School. The southern half of the creek contains sparse patches of giant reed. North of its confluence with Reeves Creek, giant reed is absent. The giant reed density mapping completed by Wildscape and presented in Figure A.7-1 is generally consistent with the October 2008 and June 2009 field observations; however, giant reed was not observed in Thacher Creek east of Thacher School.

Reeves Creek. East of its confluence with Thacher Creek to McAndrew Road, the Reeves Creek channel is highly disturbed and mostly devoid of vegetation as it passes through citrus orchards immediately north of Reeves Road. Occasional coast live oak is present in upland areas. Northeast of McAndrew Road, the channel naturalizes and the vegetation transitions to native riparian forest, including California sycamore, Fremont's cottonwood (*Populus fremontii*), California walnut (*Juglans californica*), willows (*Salix* sp.), blackberry (*Rubus* sp.), poison oak (*Toxicodendron diversilobum*), and mulefat. Canopy and understory vegetation increases in structure and diversity. Flowing water was audible at the northernmost portion of the creek within the proposed project area, near Wilsie Canyon; however, this area was inaccessible due to dense blackberry and right-of-entry restrictions. Project biologists were able to access approximately 200 feet southwest of the northern terminus of Reeves Creek and did not observe flowing or standing water. Patches of low-density giant reed were observed throughout the creek, consistent with the giant reed density mapping completed by Wildscape and presented in Figure A.7-1.

Wildlife

Overall, the proposed project area is highly disturbed with sparse native vegetation, which provides low quality habitat for a limited number of wildlife species. However, more structured riparian and mulefat scrub habitats within the drainages and coast live oak in the adjacent uplands can support a variety of resident and migratory wildlife use. Wildlife observed and detected within the proposed project area during reconnaissance surveys in October 2008 included a variety of reptiles, birds, and small mammals (Aspen Environmental Group, 2008). Wildlife observations and habitat suitability are discussed in the following paragraphs.

Native Fish. With the exception of a short section of Reeves Creek, flowing water was not present within the proposed project area during the October 2008 biological surveys and no fish were observed. It is possible that fish are present in portions of Reeves Creek; however, these creek areas were not accessible to the survey team. The absence of water in most of the drainages is typical for the region, although upper San Antonio Creek provides suitable spawning habitat for southern steelhead (*Onchorrhynshus mykiss irideus*), as described in Section B.6A.

Amphibians. Amphibians often require a source of standing or flowing water to complete their life cycle. However, some terrestrial species can survive in drier areas by remaining in moist environments found beneath leaf litter and fallen logs, or by burrowing into the soil. Although no amphibians were observed during the proposed project's October 2008 surveys, the proposed project area likely supports common amphibian species including tree frogs (*Hyla regilla*) and western toads (*Bufo boreas*).

Reptiles. The diversity of reptile species is related to the diversity of plant communities found in a given area. Typically, plant communities that have an abundant amount of undisturbed leaf litter, rocks, and rotting logs have a higher diversity than those areas with regular disturbance. Due to the high levels of disturbance throughout the proposed project area, observations of common reptile species during reconnaissance surveys were limited to western fence lizard (*Sceloporus occidentalis*) and common sideblotch lizard (*Uta stansburiana*) (Aspen Environmental Group, 2008). Other species that may occur onsite within upland vegetation or the riprap banks include coastal whiptail (*Aspidoscelis tigris multiscutatus*), common gopher snake (*Pituophis melanoleucus*), and alligator lizard (*Elgaria multicarinata*).

Birds. Birds were the most common vertebrates detected by sight or sound in the proposed project area during the October 2008 biological surveys (Aspen Environmental Group, 2008). Common bird species observed include turkey vulture (*Cathartes aura*), red-shouldered hawk (*Buteo lineatus*), common raven (*Corvus corax*), California quail (*Callipepla californica*), mourning dove (*Zenaida macroura*), Anna's hummingbird (*Calypte anna*), acorn woodpecker (*Melanerpes formicivorus*), and black phoebe (*Sayornis nigricans*). As described above, the majority of the proposed project area is highly disturbed and supports sparse native and exotic vegetation; these areas may provide transitory resting and foraging areas for migratory birds. Areas with structured canopy and developed understory, as observed at the eastern end of Reeves Creek, and areas of denser mulefat/willow scrub, as observed at upper San Antonio Creek and the eastern end of Thacher Creek, provide suitable nesting habitat for a variety of riparian-nesting species (e.g., yellow-breasted chat and vireo). Mature coast live oak trees in the adjacent uplands throughout the proposed project area provide suitable nesting habitat for raptors.

Mammals. Large mammals were not observed during the October 2008 survey. Mammal observations in the proposed project area were limited to Beechey ground squirrel (*Spermophilus beecheyi*), Botta's pocket gopher (*Thomomys bottae*), and Audubon's cottontail (*Sylvilagus audubonii*). Although not observed, the proposed project area likely supports a variety of other mammal species such as coyote (*Canis latrans*) and bobcat (*Lynx rufus*), as evidenced by wildlife trails and scat present in dense stands of mulefat in the southern and eastern ends of the proposed project area. Domestic animals such as cats (*Felis catus*) and dogs (*Canis familiaris*) were observed and would be expected to occur throughout most of the proposed project area, due to its proximity to residential development.

Impact Criteria

Evaluating the significance of potential project-related impacts to biological resources depends on characterizing existing conditions of the proposed project area and determining the direct and indirect effects to target species and their habitats. An impact that results in the long-term loss or degradation of sensitive habitat, or that adversely affects the population of a special-status species is considered significant.

The level of significance of project-related impacts to biological resources is based on Appendix G of the *State CEQA Guidelines*, which states that a proposed project would have a significant impact on the environment if it exceeds one or more of the following thresholds:

- Conflicts with adopted environmental plans and goals of the community where it is located;
- Substantially affects a rare or endangered species of animal, plant, or the habitat of a species;
- Interferes substantially with the movement of any resident or migratory fish or wildlife species;
- Substantially diminishes habitat for fish, wildlife, or plants;
- Substantially affects federally protected wetlands as defined by Section 404 of the Clean Water Act through direct removal, filling, hydrological interruption or other means.

Impacts are classified as unavoidable and significant, less than significant with mitigation incorporated, less than significant, or no impact, depending on the size, type, and timing of the impact and the biological resources involved. Disturbance of habitats and/or species is considered significant if it affects biological resources in the following ways:

- Substantially reduces or eliminates species diversity or abundance;
- Substantially reduces or eliminates quantity or quality of nesting areas;
- Substantially limits reproductive capacity through loss of individuals or habitat;
- Substantially fragments, eliminates, or otherwise disrupts foraging areas and/or access to food sources;
- Substantially limits or fragments the geographic range or dispersal routes of species;
- Substantially interferes with natural processes, such as fire or flooding, upon which the habitat depends.

B.6A Endangered, Threatened, or Rare Species

Special-status species in the proposed project area include flora, fauna, and vegetation communities that are listed as threatened or endangered, candidate species, or species of special concern under the California or federal Endangered Species Act, species that are listed as fully protected by the CDFG, and plants considered by the CNPS to be rare, threatened, or endangered in California and beyond.

The Ventura County threshold criteria for endangered, threatened, or rare species (County of Ventura, 2005a) state that a significant impact to such species would occur if a project would directly or indirectly:

- Reduce species population;
- Reduce species habitat;
- Restrict reproductive capacity.

Special-Status Plant Species. Table B.6-1 presents a list of the special-status plant species with the potential to occur in the proposed project area per the information sources outlined under Section B.6, above. Reconnaissance surveys were conducted in October 2008 that recorded all plant species observed within the proposed project area and assessed the potential for its habitat to support special-status plants. A total of 19 special-status plant species were identified; however, the lack of suitable natural habitat in the proposed project area reduces the likelihood of occurrence for these sensitive plant species. Each of these species was assessed for its potential to occur within the project area per the following criteria:

- **Present:** The species was observed within the proposed project area at the time of the proposed project's biological surveys.
- **High:** Both a recent recorded occurrence (within 10 years) exists for the species within the proposed project area or its immediate vicinity (approximately five miles) and the environmental conditions (including soil type) associated with species presence occur within the proposed project area.
- **Moderate:** A historical record (within 25 years) exists for the species within and adjacent to the proposed project area (approximately five miles) and the environmental conditions (including soil type) associated with species presence occur within the proposed project area.
- **Low:** No records for the species occur within the proposed project area or its immediate vicinity (approximately five miles) and/or the environmental conditions (including soil type and elevation factors) associated with species presence are marginal within the proposed project area.
- **Not likely to Occur:** The species was not observed during reconnaissance surveys conducted at an appropriate time for its identification and the species is restricted to environmental conditions (including habitat, soil, and elevation factors) that do not occur within the proposed project area.

Special-status plant species were not observed in the proposed project area during the October 2008 surveys (Aspen Environmental Group, 2008). Although not observed during the October 2008 surveys Plummer's baccharis (*Baccharis plummerae*; CNPS List 1B.2) was documented in the project area by Wildscape in 2008.

Other sensitive plant species including Fish's milkwort (*Polygala cornuta var. fishiae*; CNPS List 4), and Humboldt lily (*Lilium humboldtii*; CNPS List 4) have a high potential to occur on site as they are known from recent occurrences within the San Antonio Creek watershed (Wildscape, 2008). Although CNPS List 4 species are considered a watch list species, they are not typically afforded protection under the California Environmental Quality Act (CEQA). Additionally, there is high potential for a variety of locally important plant species to occur. Locally important species observed during the October 2008 include southern California black walnut (also CNPS List 4), southern California gooseberry (*Ribes californicum*), and coast live oak.

Table B.6-1 Known and Potential Occurrence of Special-Status Plant Species Within and Adjacent to the Proposed Project Area

Scientific Name	Common Name	Status	Blooming Period	Habitat Association and Elevation Limits	Known and Potential Occurrence in the Proposed Project Area
Acanthoscyphus parishii var. *abramsii*	Abram's oxytheca	List 1B.2	Jun-Aug	Chaparral; sandy or shale soils; 1143-2057 meters (m)	Not likely to occur. No suitable habitat occurs and the proposed project area is below the known elevation range for this variety.
Aphanisma blitoides	Aphanisma	List 1B.2	Mar-Jun	Coastal bluff scrub, coastal dunes, coastal scrub; sandy soils; 0-305 m	Not likely to occur. No suitable habitat occurs within the proposed project area.
Astragalus didymocarpus var. *milesianus*	Miles' milk-vetch	List 1B.2	Mar –Jun	Coastal scrub; clay soils; 20-90 m	Not likely to occur. No suitable habitat occurs and proposed project area is above the known elevation range for this variety.
Astragalus pychnostachyus var. *lanosissimus*	Ventura marsh milk-vetch	FE, SE, List 1B.1	Jun-Oct	Coastal dunes, coastal scrub, marshes and swamps; along edges in coastal salt or brackish areas	Not likely to occur. No suitable habitat occurs within the proposed project area
Atriplex serenana var. *davidsonii*	Davidson's saltscale	List 1B.2	Apr-Oct	Coastal bluff scrub, coastal scrub; alkaline soils; 10-200 m	Not likely to occur. No suitable habitat occurs within the proposed project area.
Baccharis plummerae	Plummer's baccharis	List 1B.2	Jun	Chaparral, foothill woodland, mixed evergreen forest, coastal sage scrub; 50-480m	High. Suitable habitat exists in the upper reaches of the proposed project area. Species observed during recent surveys (Wildscape 2008).
Calochortus palmeri var. *palmeri*	Palmer's mariposa lily	List 1B.2	May-Jul	Chaparral, lower montane coniferous forest, mesic meadows and seeps; 1000-2390 m	Not likely to occur. No suitable habitat occurs and proposed project area is below the known elevation range of this variety.
Calochortus weedii var. *vestus*	Late-flowered mariposa lily	List 1B.2	Jun-Aug	Chaparral, cismontane woodland, riparian woodland; often in serpentine soils; 275-1905 m	Low. Marginal suitable habitat exists within the proposed project area. Records indicate the species was historically present in the region.
Chaenactis glabriuscula var. *orcuttiana*	Orcutt's pincushion	List 1B.1	Jan-Aug	Coastal bluff scrub, coastal dunes; sandy soils; 3-100 m	Not likely to occur. No suitable habitat occurs within the proposed project area.
Delphinium umbraculorum	Umbrella larkspur	List 1B.3	Apr-Jun	Cismontane woodland; 400-1600 m	Not likely to occur. No suitable habitat occurs within the proposed project area.
Fritillaria ojaiensis	Ojai fritillary	List 1B.2	Feb-May	Broadleafed upland forest, chaparral, lower montane coniferous forest; mesic areas, rocky soils; 300-998 m	Moderate. Suitable habitat exists within the proposed project area. The species was not detected during surveys of the proposed project area; however, there are records for this species within several of the surrounding canyons.
Horkelia cuneata ssp. puberula	Mesa horkelia	List 1B.1	Feb-Jul	Chaparral, cismontane woodland, coastal scrub (sandy or gravelly); 70-810 m (230-2657 ft)	Not likely to occur. No suitable habitat occurs within the proposed project area.
Imperata brevifolia	California satintail	List 2.1	Sep-May	Coastal scrub, chaparral, riparian scrub, Mojavean scrub, meadows and seeps; mesic sites, alkali seeps, riparian areas; 0–500 m	Moderate. Suitable habitat exists within the proposed project area. The species is known from Lyon Springs, near Matilija Lake, approximately 5 miles northwest of the proposed project area.

Scientific Name	Common Name	Status	Blooming Period	Habitat Association and Elevation Limits	Known and Potential Occurrence in the Proposed Project Area
Lasthenia glabrata ssp. *coulteri*	Coulter's goldfields	List 1B.1	Feb-Jun	Marshes and swamps, playas, vernal pools; 1-1220 m	Not likely to occur. No suitable habitat occurs within the proposed project area.
Layia heterotricha	Pale-yellow layia	List 1B.1	Mar-Jun	Cismontane woodland, coastal scrub, pinyon and juniper woodland, grassland; alkaline, clay soils; 300-1705 m	Not likely to occur. No suitable habitat occurs within the proposed project area.
Nolina cismontana	Peninsular nolina	List 1B.2	May-Jul	Chaparral, coastal scrub; sandstone or gabbro substrates; 140-1275 m	Not likely to occur. No suitable habitat occurs within the proposed project area.
Orobanche valida ssp. *valida*	Rock Creek broomrape	List 1B.2	May-Sep	Chaparral, pinyon and juniper woodland; granitic soils; 1250-2000m	Not likely to occur. No suitable habitat occurs and the proposed project area is below the known elevation range for this subspecies.
Sagittaria sanfordii	Sanford's arrowhead	List 1B.2	May-Oct	Marshes and swamps; shallow freshwater; 0-650 m	Low. Marginal suitable habitat exists within the proposed project area. The proposed project area is not within the known range of the species.
Sidalcea neomexicana	Salt Spring checkerbloom	List 2.2	Mar-Jun	Chaparral, coastal scrub, lower montane coniferous forest, Mojavean desert scrub, playas; mesic, alkaline areas; 15-1530 m	Not likely to occur. No suitable habitat occurs within the proposed project area.

Sources: CDFG 2008, CNPS 2008a and 200b, USFWS 2008, Aspen 2008 field surveys, Wildscape 2008 field surveys

FE –Federally listed Endangered

FT – Federally listed Threatened

SR – California Rare

SE – California-listed Endangered

ST – California-listed Threatened

CNPS 1B – Rare or endangered in California and elsewhere

CNPS 2 – Rare or endangered in California, more common elsewhere

- 0.1 = Seriously endangered in California (over 80% of occurrences threatened / high degree and immediacy of threat)
- 0.2 = Fairly endangered in California (20-80% occurrences threatened)
- 0.3 = Not very endangered in California (<20% of occurrences threatened or no current threats known)

Special-Status Wildlife Species. Table B.6-2 summarizes the sensitive wildlife species with the potential to occur in the proposed project area, as identified from searches of the CNDDB and USFWS species lists for the USGS 7.5 minute Ojai Quadrangle and its eight surrounding Quadrangles. Reconnaissance surveys were conducted in October 2008 that recorded all wildlife species observed in the proposed project area and assessed the potential for its habitat to support special-status animals (Aspen Environmental Group, 2008). Each of these species was assessed for its potential to occur in the project area based on the following criteria:

- **Present:** The species was observed or in the same watershed (aquatic species only) during the proposed project's biological surveys, or its population has been acknowledged by CDFG or USFWS.
- **High:** Habitat (including soils) for the species occurs in the proposed project area and a known occurrence has also occurred within 5 miles of the proposed project area within the past 10 years.
- **Moderate:** Habitat (including soils) for the species occurs in the proposed project area and a known occurrence occurs within the database search, but not within 5 miles of the proposed project area or within the past 20 years; or a known occurrence occurs within 5 miles of the proposed project area and within the

past 20 years and marginal or limited amounts of habitat occurs in the proposed project area; or the species' range includes the geographic area and suitable habitat exists.

- **Low:** Limited habitat for the species occurs in the proposed project area and no known occurrences were found within the database search and the species' range includes the geographic area.
- **Not likely to occur:** Habitat requirements strongly associated with the species (including vegetation and soils) do not occur within the proposed project area, or the known range of the species does not include the proposed project area.

No sensitive wildlife species were identified in or adjacent to the proposed project area during the October 2008 biological surveys (Aspen Environmental Group, 2008).

Upper San Antonio Creek south of the City of Ojai is known to support the southern steelhead (*Onchorrhynshus mykiss irideus*), a federally endangered species and a California Species of Special Concern. There is a 1993 CNDDB occurrence record for steelhead within this portion of the proposed project area and several stray adults were stranded in a man-made pool connected to San Antonio Creek on the Soule Park Golf Course in 1999 (Federal Emergency Management Agency [FEMA], 2002). Steelhead may travel through the southern reaches of the proposed project area during winter flows in search of spawning habitat. The central portion of San Antonio Creek, including its confluences with McNell and Thacher Creeks has reduced habitat quality due to increased urban runoff, channelization, and the presence of several road crossings and flood control structures. Although the upper reaches of the proposed project area have suitable natural habitat, access by steelhead is limited.

Several other special-status species listed in Table B.6-2 have a moderate to high potential of occurrence in the proposed project area. These include the monarch butterfly (*Danaus Plexippus*) California red-legged frog (*Rana draytonii*), two-striped garter snake (*Thamnophis hammondii*), southwestern pond turtle (*Actinemys marmorata pallid*), yellow-breasted chat (*Icteria virens*), least Bell's vireo (*Vireo bellii pusillus*), and yellow warbler (*Dendrocia petechia brewsteri*).

Due to a lack of deep, still, or slow-moving water, suitable breeding habitat for red-legged frog is limited within the proposed project area. However, suitable foraging habitat exists along Thacher and San Antonio Creeks. In 2001, red-legged frogs were observed along San Antonio Creek, less than two miles southwest of the proposed project area. Although this species was not observed during October 2008 surveys (likely due to low precipitation levels), it is expected to occur periodically within portions of the subject creek reaches due to their close proximity to known red-legged frog occurrences. Similarly, two-striped garter snake and southwestern pond turtle are expected to occur in perennial aquatic habitat with native vegetation in years of adequate precipitation.

Neotropical migrants and riparian nesting bird species are expected to occur in suitable habitat within the northern and southern creek reaches of the proposed project area that are not subject to intense urbanization and development. Although high-quality stands of native riparian habitat do not exist in the proposed project area, these species, especially least Bell's vireo, are utilizing marginally suitable habitat in the Ventura River watershed. In addition, mature oaks, cottonwoods, and sycamores in adjacent upland areas provide suitable nesting habitat for raptors. At Soule Park a red-shouldered hawk was observed in flight during the October 2008 surveys (Aspen Environmental Group, 2008).

Table B.6-2 Known and Potential Occurrence of Special Status Wildlife Species Within and Adjacent to the Proposed Project Area

Scientific Name	Common Name	Status	Habitat Type	Known or Potential Occurrence in the Proposed Project Area
INVERTERBRATES				
Danaus plexippus	Monarch butterfly	SSA	Roosts in wind-protected tree groves (eucalyptus, cypress, etc.) with nectar and water sources nearby.	Moderate. Limited habitat occurs within the proposed project area.
FISHES				
Catostomus santaanae	Santa Ana sucker	FT, CSC	Habitat generalists; prefer sand-rubble-boulder botto.ms, cool, clear water and algae.	Low. Suitable habitat exists in the proposed project area. This species is not known from Ventura River watershed.
Eucyclogobius newberryi	Tidewater goby	FE, CSC	Shallow lagoons and lower stream reaches in brackish water; require fairly still, but not stagnant water and high oxygen levels.	Not likely to occur. No suitable habitat occurs within the proposed project area.
Gila orcuttii	Arroyo chub	CSC	Los Angeles Basin south coastal streams; slow water stream sections with mud or sand bottoms.	Not likely to occur. No suitable habitat occurs within the proposed project area.
Onchorrhynshus mykiss irideus	Southern steelhead (Southern California ESU)	FE, CSC	Cool, clear, fast-flowing permanent streams and rivers where there are more riffles than pools.	High. Suitable habitat exists in proposed project area. Species documented in San Antonio Creek.
AMPHIBIANS				
Bufo californicus	Arroyo toad	FE, CSC	Semi-arid regions near washes or intermittent streams; rivers with sandy banks, willows, cottonwoods, and sycamores; loose, gravelly areas of streams.	Not likely to occur. No suitable habitat occurs within the proposed project area.
Rana draytonii	California red-legged frog	FT, CSC	Lowlands and foothills in or near permanent sources of deep water with dense, shrubby, or emergent riparian vegetation.	Moderate. Suitable breeding habitat does not occur within the proposed project area. However, suitable foraging habitat occurs in Thacher and San Antonio Creeks. Species may disperse into or through the proposed project area.
REPTILES				
Actinemys marmorata pallid	Southwestern pond turtle	CSC	Permanent or nearly permanent bodies of water in various habitat types; requires suitable basking sites, such as partially submerged logs, vegetation mats, or open mud banks.	Moderate. Marginal suitable habitat occurs in southern portions of San Antonio creek near Soule Park Golf Course. Species is known from several locations within the same watershed as the proposed project area.
Anniella pulchra pulchra	Silvery (=California) legless lizard	CSC	Beaches, chaparral, pine-oak woodlands; typically associated with sandy or loose loamy soils under sparse vegetation; soil moisture is essential.	Low. No suitable habitat occurs within the proposed project area.
Phrynosoma coronatum blainvillii	Coast (San Diego) horned lizard	CSC	Inhabit a wide variety of habitats, including coastal scrub, chaparral, grasslands, coniferous forests, oak woodlands, riparian, and high-elevation desert margins; prefers areas with loose, fine soils, an abundance of open basking sites, and native ants for feeding.	Low. No suitable habitat occurs within the proposed project area.
Thamnophis hammondii	Two-striped garter snake	CSC	Perennial and intermittent streams and ponds in chaparral, oak woodland, and forest habitats; may occupy adjacent grassland and coastal scrub habitats in winter.	Moderate. Suitable habitat occurs in the proposed project area. The proposed project area is within the known range of this species.

Scientific Name	Common Name	Status	Habitat Type	Known or Potential Occurrence in the Proposed Project Area
BIRDS				
Agelaius tricolor	Tri-colored blackbird	CSC	Requires open water, protected nesting substrate, and foraging areas with insect prey within proximity to colony.	Low. No suitable foraging or nesting habitat occurs within the proposed project area. However, this species may fly over or temporarily stop in proposed project area in transition from suitable habitat outside of the proposed project area.
Charadrius alexandrinus nivosus	Western snowy plover	FT, CSC	Sandy beaches, salt pond levees, and shores of large alkaline lakes; requires sandy, gravelly, or friable soils for nesting.	Not likely to occur. No suitable foraging or nesting habitat occurs within the proposed project area.
Coccyzus americanus occidentalis	Western yellow-billed cuckoo	FC, SE	Requires dense, wide riparian woodlands with well-developed understories for breeding; prefers willows for roost sites.	Low. Marginal suitable habitat occurs within the proposed project area. Urbanization and development have reduced natural habitat quality. Not expected to occur within the proposed project area.
Dendrocia petechia brewsteri	Yellow warbler	CSC	Nests in riparian areas dominated by willows, cottonwoods, sycamores, or alders or in mature chaparral; may also use oaks, conifers, and urban areas near streamcourses.	High. Suitable habitat occurs within proposed project area. Although not observed during surveys, this species is expected to occur.
Elanus leucurus	White-tailed kite	FP	Low elevation, open grasslands, savannah-like habitats, agricultural areas, wetlands, oak woodlands; uses trees with dense canopies for cover; substantial groves of dense, broad-leafed deciduous trees are used for nesting and roosting.	Low. Limited suitable foraging or nesting habitat occurs within the proposed project area. However, this species may fly over or temporarily stop in the proposed project area in transition from suitable habitat outside of the proposed project area.
Empidonax traillii extimus	Southwestern willow flycatcher	FE	Obligate riparian species that breeds along rivers, streams, wetlands, and other aquatic-associated habitats such as extensive riparian woodlands with water-filled creeks, or channels and scattered overgrown clearings.	Low. Marginal suitable habitat occurs within the proposed project area. Urbanization and development have reduced natural habitat quality. Not expected to occur within the proposed project area.
Gymnogyps californianus	California condor	FE, SE	Require vast expanses of open savannah, grassland, and foothill chaparral in mountain ranges of moderate latitudes; nest in deep canyons containing clefts in rocky walls; forages up to 100 miles from roost/nest sites.	Not likely to occur. No suitable foraging or nesting habitat occurs within the proposed project area. Species may overfly the area but is not expected to roost or nest on site.
Icteria virens	Yellow-breasted chat	CSC	Nests in dense riparian habitats dominated by willows, alders, Oregon ash, tall weeds, blackberry, and grape vines.	High. Suitable habitat occurs within the proposed project area. Urbanization and development have reduced natural habitat quality. Species well-documented within Ventura River system and is utilizing marginal habitats. Frequently occurs with vireo.
Polioptila californica californica	Coastal California gnatcatcher	FT, CSC	Coastal sage scrub obligates; will utilize adjacent habitats, including grasslands, chaparral, and riparian habitats for foraging and dispersal.	Not likely to occur. No suitable habitat occurs within or adjacent to the proposed project area.

Scientific Name	Common Name	Status	Habitat Type	Known or Potential Occurrence in the Proposed Project Area
Vireo bellii pusillus	Least Bell's vireo	FE, SE	During breeding season, inhabits dense, low-elevation, willow-dominated riparian habitats with lush understory vegetation in immediate vicinity of watercourses; forage in riparian and adjacent upland habitats.	High. Suitable habitat occurs within the proposed project area. Although urbanization and development have reduced natural habitat quality, species is well-documented within Ventura River system and known to utilize marginal habitats.
MAMMALS				
Antrozous pallidus	Pallid bat	CSC	Rocky canyons, open farmland, scattered desert scrub, grasslands, shrublands, woodlands, mixed conifer forests; roost in rock crevices, mines, caves, tree hollows, buildings, bridges.	Not likely to occur. No suitable habitat occurs within the proposed project area.
Chaetodipus californicus femoralis	Dulzura (California) pocket mouse	CSC	Dry shrublands, lowland grasslands, chaparral, coastal scrub; prefers grass-chaparral edges.	Not likely to occur. No suitable habitat occurs within the proposed project area.
Choeronycteris mexicana	Mexican long-tongued bat	CSC	Roosts in relatively well-lit caves and in and around buildings; feeds on nectar and pollen of night-blooming succulents.	Not likely to occur. No suitable habitat occurs within the proposed project area.
Eumops perotis californicus	Western mastiff bat	CSC	Open, semi-arid to arid habitats, including conifer and deciduous woodlands, coastal scrub, grasslands, chaparral; roosts in crevices in cliff faces, high buildings, trees, and tunnels.	Not likely to occur. No suitable habitat occurs within the proposed project area.

Sources: CDFG 2008, USFWS 2008, Aspen 2008 field surveys
FT = Listed as threatened by the U.S. Fish and Wildlife Service (USFWS)
FE = Listed as endangered by the USFWS
FC = Federal candidate for listing as Threatened or Endangered (USFWS)
CE = Listed as endangered by the California Department of Fish and Game (CDFG)
CSC = California Species of Special Concern (CDFG)
SSA = State Special Animal (CDFG)
FP = Fully Protected (CDFG)

Proposed Project Impacts

Overview of the Effects of Herbicides. Herbicides are any chemical agents, taken from a broader spectrum of pesticides, which target the specific control or removal of plants. Many noxious weed control programs rely heavily or solely on herbicide applications, as these methods often provide the most efficient and cost-effective opportunities for eradication, especially when large populations of weeds are targeted for removal. However, herbicides may harm or kill native vegetation occurring in close proximity to, or downstream of, the targeted weeds due to drift or direct accidental applications.

There are several exposure scenarios possible for herbicides and wildlife. These include: direct spray and overspray; indirect contact through grooming or contact with affected vegetation; and, ingestion of contaminated media, including vegetation, prey species, and water. Herbicides may also negatively impact water quality where egg strings or juveniles are present. Because of the relationship of body weight to surface area and to the consumption of food and water, small animals will generally receive a higher dose, in terms of body weight, than large animals for a given type of exposure (Durkin, 2007). Amphibians may be particularly susceptible (Relyea, 2005), as they are often aquatic and readily absorb compounds through their skin.

While the overall benefits of herbicide use are generally straightforward, herbicide use may have detrimental effects on ecosystem values and functions as well. As such it is generally desirable to select a herbicide that has low toxicity and will not move from its target, leach into groundwater (low water solubility), or remain in the environment for a long period of time (low persistence). Furthermore, the application method selected depends on the type of control needed, the type of vegetation targeted for removal, and a given site's conditions and location. Not all herbicides or application methods are equally appropriate, effective, or safe, given different site conditions and weed species.

For the above reasons, under the proposed project only herbicides specifically approved and labeled for use near and in open water would be used, and their application would be completed under very specific conditions. A glyphosate-based herbicide such as Aquamaster® would be used. Glyphosate is a non-selective herbicide that readily and completely biodegrades in soil, and has little potential for leaching into groundwater (USEPA, 2006a). In the soil, the half-life of glyphosate can range between three to 130 days, depending on site-specific soil structure, moisture, and temperature. Its half-life in water is estimated to range from a few to 63 days, depending on site-specific conditions (USEPA, 2006b; United States Forest Service, 2002). All on-site herbicide applications would be completed or supervised by personnel holding either a Qualified Applicator License or a Qualified Applicator Certificate from the California Department of Pesticide Regulation. The on-site supervisor would additionally ensure that: all safety measures and manufacturer specifications are followed; the VCWPD's protocols to avoid herbicide drift into adjacent areas implemented; and, the specifications and Best Management Practices (BMPs) provided in the *Plans and Specifications for the Matilija Dam Ecosystem Restoration Project Giant Reed Removal Project* (County of Ventura, 2007) are followed. These specifications and BMPs include, but are not limited to:

- Work shall not be conducted within the breeding, nesting, and fledging season for most migratory birds (March 1 to September 15), without prior surveys resulting in a negative finding.
- Herbicide shall not be used at least 24 hours in advance of a predicted rainfall event or within 24 hours after a rainfall event.
- Equipment refueling and herbicide mixing and storage shall occur in designated staging areas at least 100 feet from riparian and wetland habitats.
- Aquatic application of herbicide is strictly prohibited. The contractor shall not conduct foliar application within 25 feet of any standing or flowing surface waters, and shall not allow herbicide to contact surface waters or native vegetation extending over surface waters.

Vegetation and Special-Status Plants. In California more than 95 percent of riparian habitats that were present prior to European settlement have been severely degraded or destroyed (Smith, 1977; Katibah, 1984). Many aquatic and semi-aquatic species rely on riparian vegetation to provide necessary foraging and nesting habitat (Rottenborn, 1999; Bolger et al., 1997). In addition, riparian areas, particularly in arid regions such as southern California, play a particularly crucial role in maintaining biodiversity; up to 80 percent of vertebrate species rely on them for at least part of their lifecycle (Knopf, et al., 1988). Riparian areas also serve a variety of ecological functions (Rottenborn, 1999; Fischer and Fischenich, 2000). The introduction of noxious and invasive weeds species in these areas is a special concern for native plant communities and is recognized by resource agencies and ecologists as a threat to native vegetation communities and wildlife. Noxious and invasive weeds, particularly giant reed, pose a threat to the natural processes of plant community succession, fire frequency, biological diversity and species composition. Noxious and invasive weeds can also affect the persistence of some populations of special-

status species by replacing the foraging base, altering habitat structure, or excluding a species by vegetative growth.

In the proposed project area, channel modifications from urban development, agriculture, and the spread of giant reed have severely degraded habitat in many portions of the upper San Antonio Creek watershed. Federal and State-listed plants were not observed during the proposed project's biological surveys (Aspen Environmental Group, 2008), and are not expected to occur. However, several CNPS-listed and Ventura County locally important plant species are known to occur throughout the proposed project area, as outlined in Table B.6-1. The proposed project would remove giant reed (as well as the opportunistic removal of castor bean) from upper San Antonio, McNell, Thacher, and Reeves Creeks. A "cut and daub" treatment would be used for over 95 percent of the initial giant reed removal. Cut plant material would be transported to Soule Park for chipping. The remaining giant reed material (less than five percent) would be foliar sprayed on site. This treatment would typically be applied to those stands of giant reed that have a cover of 20 percent or greater. Once dead, the sprayed plant material would be either left in place or taken to a local greenwaste or landscaping company for its use as mulch or other purposes. As described in Section A.7 (Project Description), no heavy equipment would be required and no sub-surface disturbances would occur. Due to the nature of the proposed project, specifically the removal of invasive non-native plant species, significant adverse impacts to native vegetation and special-status plant species would not be expected to occur. In some cases, however, there is a potential for overspray from the proposed herbicide onto native vegetation, including special-status plant species. No spraying would be undertaken during high wind events and the standard requirements incorporated into the proposed project, as addressed above under "Overview of the Effects of Herbicides," would reduce the potential for non-targeted herbicide applications to occur. In some instances there may also be the potential for native vegetation that is located within or adjacent to a stand of giant reed to be inadvertently subject to damage or mortality due to work crew activities. However, such damage would be expected to be very limited and short-term in nature. In the absence of competition from invasive species, native plants would be expected to recolonize the giant reed removal areas, thereby restoring and enhancing native vegetation communities and sensitive plant habitat in the upper San Antonio Creek watershed. As such, short-term impacts during the proposed project's implementation phase would be less than significant and its long-term impacts would be beneficial.

Special-Status Wildlife Species

California red-legged frog. California red-legged frogs have the potential to occur in the proposed project area. While this species is typically highly aquatic, California red-legged frogs have been documented to make overland movements of several hundred meters and up to one mile during a winter-spring wet season (Bulger et al., 2002; Fellers and Kleeman, 2007). This is particularly true on nights with high humidity or during precipitation. In addition, there is mounting evidence that many wildlife species do not necessarily restrict their movements to some obvious landscape element, such as a riparian corridor. For example, radio-tracking and tagging studies of California red-legged frogs have found that long-distance dispersal involved radial or perpendicular linear movements away from a water source with little regard to the orientation of the assumed riparian "movement corridor" (Fellers and Kleeman, 2007; Semlitsch, 1998; Reese and Welsh, 1997). However, because much of the adjacent

upland habitat in the proposed project area has been converted to agricultural, semi-rural, semi-urban and urban uses, this species may be more restricted to creek corridors.

While many of the targeted creek reaches are intermittent and do not typically support standing water, if present, California red-legged frogs may use the targeted creek reaches to disperse throughout the proposed project area. If deep pools form after storms this species may also be present directly adjacent to proposed removal areas. If California red-legged frogs are present during removal activities, either in the targeted creek reaches or their upland areas, impacts to this species may include direct mortality if they are crushed by project-related workers. This species, which is small, inconspicuous and typically slow-moving, may also be subject to mortality from project-related vehicles (e.g., road kill) because they disperse across uplands between water sources. Potential direct impacts could additionally occur from accidental herbicide spills. For those stands of giant reed that are cut, the plant's rhizome would be left in place, which would maintain soil stability. However, in the event that project-related sediment transport from upslope areas to water supporting this species occurs, indirect impacts could result because the degradation of water quality, through increased sedimentation, can smother egg masses and juveniles or result in decreased water oxygen levels.

To avoid potential adverse impacts the proposed project would implement the following requirements: (1) avoid all standing and flowing water; (2) prohibit herbicide applications prior to, during, or within 24 hours following a rain event; and, (3) remove vegetation with hand held equipment. However, as outlined above, direct and indirect impacts to this special-status wildlife species may still occur, particularly during the proposed project's initial giant reed removal phase. Implementation of Mitigation Measures B-1 through B-3, below, would reduce these impacts to less than significant.

MM B-1 A qualified biologist approved by the United States Fish and Wildlife Service and California Department of Fish and Game shall be present for all giant reed removal activities. The biologist shall be familiar with the wildlife species and other sensitive biological resources of the project area, be qualified to recognize potential effects to these resources, and ensure that all State and/or federal wetland/riparian and special-status species protection guidelines, as applicable, are followed. The biologist shall conduct sensitive floral and faunal clearance surveys within ten (10) days prior to any area(s) targeted for giant reed removal, including but not limited to surveys for the California red-legged frog, least Bell's vireo, southwestern willow flycatcher, southwestern pond turtle and southern steelhead. The biologist shall contact and consult with the California Department of Fish and Game if any sensitive biological resources are found within those areas targeted giant reed removal to develop and subsequently implement a Conservation Action Plan for any issues identified. During project implementation, the biologist shall additionally have the authority to stop or otherwise re-direct project-related activities in the event that any previously unidentified sensitive biological resources are identified.

MM B-2 Prior to project implementation, all project-related personnel shall be made familiar with the sensitive biological resources that may occur in the project area. All project-related personnel shall also be trained in, and required to comply with, the project's protocols, standards, specifications, recommendations and BMPs for herbicide applications, as well as the project's mitigation measures and permit conditions for

environmental protection. All work crews shall be equipped with, and trained in the use of, spill cleanup kits for all equipment fueling, herbicide mixing and herbicide applications. All work crews additionally shall be provided with the California Department of Fish and Game's Office of Spill Prevention and Response (OSPR) contact phone number. In the event of a fuel or herbicide spill, the on-site construction crew manager shall call the OSPR immediately.

MM B-3 No project-related activities shall be conducted during periods of surface flow in the creek reaches targeted for giant reed and castor bean removal.

The removal of giant reed from the upper San Antonio Creek watershed would ultimately enhance habitat for native vegetation and improve water quality, thereby restoring potential California red-legged frog habitat. As such, the proposed project's long term impacts to this species would be beneficial.

Southern Steelhead. As noted previously, San Antonio Creek is known to support southern steelhead and this species is expected to travel through the southern reaches of the proposed project area during winter flows in search of spawning habitat. If this species is present during giant reed removal activities, direct impacts could include mortality due to crushing or accidental herbicide spills. However, direct effects to southern steelhead would not likely to occur from vegetation removal activities. This species only occurs during specific times of the year and proposed project activities would not be allowed in areas of ponded or flowing water. Sediment transport from upslope areas to water supporting this species is also not expected to result in direct or indirect effects as the giant reed rhizome would be left in place, which would maintain soil stability. With implementation of the VCWPD's applicable protocols and BMPs, as specified in the *Plans and Specifications for the Matilija Dam Ecosystem Restoration Project Giant Reed Removal Project* (County of Ventura, 2007) and Mitigation Measures B-1 and B-2, potential impacts to southern steelhead during the proposed project's implementation phase would be less than significant.

Giant reed removal would ultimately restore southern steelhead spawning habitat by improving water quality and potentially increasing water supply. Although direct and indirect impacts may occur in the short term from project-related activities, such as the removal of shade in some areas, implementation of the proposed project would result in long-term beneficial impacts to this species.

Least Bell's Vireo. Least Bell's vireo is well-documented in riparian habitat associated with the Ventura River, and is also known to be moving inland along its tributaries where suitable habitat and access to summer water occur. As such, this species may occur in mulefat scrub and willow riparian habitat in the proposed project area. Project-related traffic (e.g., the trucks needed to transport cut vegetation to Soule Park), the hand-held equipment needed to cut giant reed and chipping activities in areas that are used by nesting birds, or near water sources, can disrupt breeding, foraging, and movement. These disturbances would result in nest, roost, or territory abandonment and subsequent reproductive failure if they were to occur during the breeding season (March 1st through September 15th). However, no project-related activities would occur prior to September 15th. As such, impacts to least Bell's vireo and other breeding birds would be avoided.

The proposed project would restore native riparian habitat by eradicating highly-competitive invasive plant species. The removal of this and other exotic plants from the upper San Antonio Creek watershed would provide for the recruitment of native plants and would result in long-term beneficial impacts to least Bell's vireo and other migratory birds.

Other Special-Status Wildlife Species. Five other special-status species have a moderate to high potential to occur in the proposed project area, including monarch butterfly, two-striped garter snake, southwestern pond turtle, yellow-breasted chat, and yellow warbler.

Monarch butterfly, a State Special Animal, is known to utilize wind protected windrows of eucalyptus trees along the coast California with wintering populations documented in both Santa Barbara and Ventura Counties. In addition, this species is commonly observed in the Ojai Valley and may occur in portions of the proposed project area. Impacts to wintering colonies, if present, would not be expected to occur. This species is not expected to occur in large numbers and milkweed, its primary host plant, would not be targeted for eradication. In addition, it is anticipated that a "cut and daub" treatment would be used for approximately 95 percent or more of the initial giant reed removal. Using this treatment would avoid potential effects to wintering monarchs, if present. Although a foliar application would be used for approximately five percent or less of vegetation targeted for removal, this type of application would not occur during periods of high wind. Additionally, the removal of exotic plants would increase the potential for native plants to colonize in the project area, thereby resulting in beneficial impacts. Project effect on this species would be less than significant.

Impacts to two-striped garter snake and southwestern pond turtle would be similar to California red-legged frog, including direct mortality and indirect temporary impacts from reduced water quality or mechanical crushing from vegetation clearing or human trampling. The southwestern pond turtle is normally found in and along riparian areas, although gravid females have been reported to nest more than 1,300 feet away from the nearest aquatic habitat (Holland, 1994). The preferred habitat for these turtles includes ponds or slow-moving water with numerous basking sites (logs, rocks, etc.), food sources (plants, aquatic invertebrates, and carrion), and few predators (raccoons, introduced fishes, and bullfrogs). These resources are largely absent from the proposed project area but may occur periodically during periods of high precipitation.

The two-striped garter snake is highly aquatic but may move considerable distances into upland habitats, even where permanent water is lacking. Two-striped garter snakes have been observed in riparian, freshwater marsh, coastal sage scrub, chaparral, oak woodland, and grassland habitats. Rathburn et al. (1993) found that these snakes tend to occupy streamside sites during the summer and switch to nearby upland habitats during the winter. The use of adjacent upland habitat places them at risk from vegetation removal and herbicide application. Similar to southwestern pond turtles, most of the proposed project area does not support perennial flow and adjacent vegetation has largely been converted to agricultural or residential uses. If present, these species would be more commonly associated with areas of dense vegetation and more persistent water near Thacher Creek.

Riparian birds and raptors could be subject to project disturbances in the same way as Least Bell's vireo. Giant reed removal activities, including the chipping of dead vegetation and the use of haul trucks would create temporary impacts from noise, dust, and increased human presence in and around the targeted creek reaches. These disturbances may temporarily alter foraging and breeding behavior of

wildlife. Noise levels above 75 A-weighted decibels (dBA) are known to produce adverse physiological effects on wildlife (Fletcher, 1971). As detailed in Section B.19 (Noise and Vibration), the noise from haul trucks, hand-held equipment such as chainsaws and power brush cutters, and chipping equipment would exceed 75 dBA from at least 50 feet from project-related areas. However, it is important to note that human activity (and associated noise) is common within the proposed project area, and with implementation of Mitigation Measures N-1 through N-5 and N-7 though N-9, as provided in Section B.19 (Noise and Vibration), Mitigation Measures B-1 and B-2, above, the VCWPD's measure to avoid nesting birds during the breeding season by establishing buffers (if necessary), and the planned project schedule, potential impacts would be less than significant. Following completion of the project, native habitat of the proposed project area would be restored and enhanced, thereby resulting in a long-term beneficial impact to special-status wildlife.

Cumulative Impacts. Section B.1 of this Initial Study, as supported by Appendix 2, provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. Combined, these projects could potentially result in impacts to special-status species that are cumulatively considerable. However, the proposed project's impacts to special-status species would be temporary in nature and can be mitigated to a level of less than significant through implementation of the mitigation measures provided in this Initial Study and the specifications and BMPs provided for in the *Plans and Specifications for the Matilija Dam Ecosystem Restoration Project Giant Reed Removal Project* (County of Ventura, 2007). Ultimately, the eradication of invasive non-native plant species in the proposed project area would have a beneficial impact on both common and special-status plants and wildlife species. As such, the proposed project's incremental contribution to impacts associated with special-status species would not be cumulatively considerable. Cumulative impacts would be less than significant or none.

B.6B Wetland Habitat

The drainages of the upper San Antonio Creek watershed connect to the Ventura River, which ultimately flows to the Pacific Ocean. The stream hydrology of most of the proposed project area appears to be intermittent, based on the high permeability of the soil and the limited water observed during field reconnaissance (Aspen Environmental Group, 2008). Although a formal jurisdictional determination and delineation of wetlands and waters of the United States was not performed, it is anticipated that the drainages of the proposed project area would be subject to U.S. Army Corps of Engineers and California Department of Fish and Game jurisdiction.

Proposed Project Impacts. According to the Ventura County *Initial Study Assessment Guidelines*, a project would have a significant impact if it would "result in the direct reduction of, or a substantial indirect impact to, a significant Wetland Habitat" (County of Ventura, 2006). It is anticipated that jurisdictional waters of the United States, waters of the State, and wetlands occur throughout the proposed project area. As referenced above, a formal determination and delineation was not conducted because adverse impacts to jurisdictional wetlands and waters would not occur; rather, the proposed project would enhance and restore native riparian habitat, wetland habitat, and jurisdictional waters of the United States and waters of the State through the removal of competing invasive non-native plant species. In addition, as noted in Initial Study Section A.9 (Other Agencies Whose Approval May Be Required), implementation of the proposed project would require issuance of a Notice to Proceed to use

Regional General Permit Number 41 (RGP No. 41) from the U.S. Army Corps of Engineers, and a Section 1602 Permit from the California Department of Fish and Game. Through these regulatory permit processes, any regulatory concerns related to wetland habitat would be fully addressed. No impacts would occur.

Cumulative Impacts. Initial Study Section B.1, as supported by Appendix 2, provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. As addressed above, the proposed project would not adversely impact wetland habitat; conversely, it would result in the restoration and enhancement of wetland habitat. Therefore, it would not incrementally contribute to wetland habitat impacts that would be cumulatively considerable. No cumulative impacts would occur.

B.6C Coastal Habitat

Proposed Project Impacts. As addressed in Section B.12 (Coastal Beaches and Sand Dunes), the proposed project area is located approximately 11 miles from the coast, and does not fall within the boundaries of the Coastal Zone. Therefore, the proposed project area is not considered coastal habitat. However, the upper San Antonio Creek watershed connects to the Ventura River, which ultimately flows to the Pacific Ocean. Although the creeks associated with the proposed project area are ephemeral, during peak storm events giant reed can be transported along the entire length of the Ventura River and recolonize within coastal areas. Implementation of the proposed project would reduce the total volume of giant reed that could recolonize in coastal habitat, thereby resulting in a net beneficial impact. No adverse impacts would occur.

Cumulative Impacts. Section B.1 of this Initial Study, as supported by Appendix 2, provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. Given their distance from the coast, none of these projects would be expected to impact coastal habitat directly, indirectly or cumulatively. As addressed above, implementation of the proposed project would result in beneficial long-term impacts to coastal habitat. Therefore, the proposed project would not incrementally contribute to impacts related to coastal habitat in a manner that would be cumulatively considerable. No cumulative impacts would occur.

B.6D Migration Corridors

Movement corridors are physical connections that allow wildlife to move between fragmented patches of suitable habitat; they may be composed of dispersal corridors, habitat linkages, travel routes, or wildlife crossings. Undisturbed landscapes contain a variety of these corridors, which facilitate wildlife movement and contribute to population stability. Conversely, human-induced habitat fragmentation typically increases the number of wildlife crossings or “choke points” in a landscape. Riparian corridors, streams, rivers, and other such linear landscape elements are generally assumed to function as wildlife movement “corridors” between habitat patches. However, several recent studies on wildlife movement conducted using radio-tracking devices concluded that many wildlife species do not necessarily restrict their movements to obvious landscape elements, such as a riparian corridor (Bulger et al., 2002).

The Ventura River and its associated drainages provide a nexus between wilderness areas of the Santa Ynez foothills, the Los Padres National Forest, Sulphur Mountain, and the Pacific Ocean. The broad

diversity of vegetation and physical topography in this region provides a mechanism for dispersal, supports wildlife travel routes, and allows habitat connectivity for a range of species including southern steelhead, neotropical song birds, carnivores, and ungulates. However, use of the drainages within the proposed project area as wildlife movement corridors is tenuous due to immediately adjacent development, agricultural uses and road crossings. Although tunnels within dense vegetation in upper San Antonio Creek provide evidence of repeated wildlife movement, it is likely that the movement is localized. The drainages within the project area do not contain the attributes needed for a high quality wildlife movement corridor (e.g., adequate space, cover, food, and water in the absence of obstacles or other distractions that interfere with movement).

Proposed Project Impacts. The drainages within the proposed project area provide low quality passage and dispersal corridors for wildlife; its proximity to development and agricultural uses causes substantial obstacles to wildlife movement. These obstacles include domestic cats and dogs, sparse or absent vegetation for significant stretches, and several low water crossings across roadways.

The proposed project would remove giant reed and castor bean, which would facilitate increased water availability in the targeted creeks areas and improve the structure and function of native riparian habitat. Consequently, the implementation of the proposed project may improve the ability of the subject creeks to function as wildlife movement corridors. No adverse impacts would occur.

Cumulative Impacts. As addressed above, the proposed project area contains low quality migration corridors. Initial Study Section B.1, as supported by Appendix 2, provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. Although these projects could combine to further degrade migration corridors, the proposed project would not result in adverse impacts to these corridors and may improve them. Therefore, the proposed project would not incrementally contribute to impacts associated with migration corridors that would be cumulatively considerable. No cumulative impacts would occur.

B.6E Locally Important Species/Communities

Proposed Project Impacts. Several locally important species, as identified in Ventura County's *Locally Important Plants List* and *Locally Important Animals List* (County of Ventura, 2008a and 2008b), as well as CNPS *Checklist of Ojai Valley Region Rare Plants* (CNPS, 2001) and *Ventura County Rare Plants* (CNPS, 2008), were identified during the proposed project's biological surveys (Aspen Environmental Group, 2008) and are known to occur in the proposed project area. These locally important species include southern California black walnut, southern California gooseberry, and coast live oak. As addressed in Section B.6A (Endangered, Threatened, or Rare Species), the proposed project may result in temporary impacts to locally important species and communities during its initial implementation phase. However, with implementation of the project's Pest Control Advisor's written recommendations, the VCWPD's protocols to avoid herbicide drift, the specifications and BMPs provided in the *Plans and Specifications for the Matilija Dam Ecosystem Restoration Project Giant Reed Removal Project* (County of Ventura, 2007), Mitigation Measures B-1 through B-3, and Mitigation Measures N-1 through N-5 and N-7 though N-9 (as provided in Section B.19 [Noise and Vibration]), potential impacts to locally important species or communities would be less than significant. Following completion of the proposed project, restored and enhanced native habitat would result in beneficial impacts to locally important species and communities.

Cumulative Impacts. Section B.1 of this Initial Study, as supported by Appendix 2, provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. Combined, these projects could potentially result in impacts to locally important species and communities that are cumulatively considerable. However, as addressed above, impacts associated with implementation of the proposed project would be temporary in nature and can be mitigated to less than significant. Additionally, the proposed project would ultimately result in beneficial impacts to locally important species and communities through the removal of highly invasive, non-native plant species. As such, the proposed project's incremental contribution to impacts related to locally important species and communities would not be cumulatively considerable. Cumulative impacts would be less than significant.

B.7 AGRICULTURAL RESOURCES

The California Department of Conservation's (DOC's) Farmland Mapping and Monitoring Program classifies lands that have agricultural value. The mapping system generated by the program is called the Important Farmlands Inventory. This system classifies land based upon the productive capabilities of the land, rather than the sole presence of ideal soil conditions. Land is divided into several categories of diminishing agricultural importance, as follows (DOC, 2008):

- **Prime Farmland and Farmland of Statewide Importance.** Areas considered to have the highest agricultural potential are classified as either Prime Farmland or Farmland of Statewide Importance. Prime Farmland includes areas with irrigated soils (Class I and II) at least 40 inches deep, a water holding capacity of at least 4 inches, and the capability of producing sustainable high yield crops. Farmland of Statewide Importance is land other than Prime Farmland that has a good combination of physical and chemical characteristics, but without minimum soil depth and water holding capacity requirements. None of the proposed project's on-site soils are classified as Prime Farmland or Farmland of Statewide Importance. Once DOC designates land as Prime Farmland, local governments may limit the use of this land to agriculture or similar types of open space (DOC, 1994).
- **Unique Farmland or Farmland of Local Importance.** Unique Farmland and Farmland of Local Importance refers to lands other than Prime Farmland or Farmland of Statewide Importance that support high value food and fiber crops. Farmland of Local Importance includes dry farming and other non-irrigated lands.
- **Grazing, Urban, or Other Farmland.** Lands that have lesser agricultural potential are classified as "Grazing," "Urban," or "Other." The latter classification includes areas that are generally unsuitable for agriculture because of geographic or regulatory constraints.

Through the IFI maps and related databases, the DOC maintains an ongoing inventory of farmland and projects that convert farmland to urban and other uses (DOC, 2006). The DOC tracks the status of farmlands through the following procedures:

- The DOC updates soil mapping every two years using infra-red aerial photos provided by the National Aeronautics and Space Administration (NASA) at a scale of 1:130,000. The most recent update is for the year 2006.
- Based on these maps, the DOC evaluates land to determine its farmland designation, and flags fallow parcels.
- In order to qualify as Prime Farmland, rather than just Prime soil, the land must have irrigation as well as prime soil attributes.
- The DOC has a minimum mapping unit of 10 acres, with smaller than 10-acre parcels being absorbed into the surrounding classifications.

The DOC's Farmland Mapping and Monitoring Program Map shows that a portion of the northern segment of upper San Antonio Creek, as well as portions of McNell, Thacher and Reeves Creeks are designated as "Farmland" (DOC, 2008).

B.7A Agricultural Soils

Proposed Project Impacts. The proposed project involves the removal of giant reed and castor bean within selected segments of upper San Antonio, McNell, Thacher and Reeves Creeks; it would not permanently convert land that is used for agricultural use. Consequently, the proposed project would not result in the conversion or removal of designated agricultural soils of importance.

As referenced above, portions of each creek targeted for giant reed removal are classified as "Farmland" by the DOC. Existing agricultural uses occur adjacent to segments of McNell, Thacher, and Reeves Creeks (primarily orchard uses). However, as discussed in Section A.7 (Project Description), it is estimated that over 95 percent of giant reed would be cut and its stumps painted with herbicide; this "cut and daub" treatment would substantially reduce the potential for herbicide drift into adjacent areas, including agricultural areas. Additionally, no sub-surface disturbances would occur and no foliar herbicide treatments would occur within 50 feet of an orchard or agricultural field, 25 feet of any surface water, or 25 feet of a roadway. These foliar spray restrictions would also minimize potential herbicide drift to agricultural soils and/or the spread of herbicides into agricultural soils through surface water or groundwater. Furthermore, prior to implementation of the project, the Ventura County Agricultural Commissioner would review and approve a written recommendation for herbicide use, as prepared by a Pest Control Advisor who holds a Qualified Applicator License or a Qualified Applicator Certificate from the California Department of Pesticide Regulation. This review and approval process would also ensure that potential impacts to agricultural soils due to herbicide use are minimized. Therefore, impacts to agricultural soils would be less than significant.

Cumulative Impacts. Section B.1 of this Initial Study, as supported by Appendix 2, provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. As addressed in Section B.1, one currently pending project involves the construction of a hay barn on agricultural property. However, existing uses of the subject property include a farm labor complex, single family residence, an existing barn, pavilion, equipment barn and equipment carport; no conversion of Prime Farmland, Farmland of Statewide Importance, Unique Farmland, or Farmland or soils designated as agriculturally important are indicated. The proposed project would not result in the conversion of any land designated by the DOC as Prime Farmland, Farmland of Statewide Importance, Unique Farmland, or Farmland. Additionally, through the implementation of the herbicide application restrictions and Ventura County Agricultural Commissioner review and approval process referenced above, potential impacts to soils used for existing agricultural operations would be less than significant. Therefore, the proposed project's incremental contribution to agricultural soils impacts would not be cumulatively considerable. Cumulative impacts would be less than significant.

B.7B Agricultural Water

Proposed Project Impacts. As discussed in Section B.4 (Water Resources) the proposed project would have no impacts on ground or surface water quantity, and less than significant impacts on ground and surface water quality. Under the proposed project, no groundwater pumping would occur and no

surface or imported water supplies would be required. Therefore, the quantity of existing water supplies available to agricultural uses would not be affected. As addressed in Section B.7A, above, the majority of herbicide applications (95 percent or more) would use a "cut and daub" treatment, which would minimize potential herbicide drift, and no foliar herbicide treatments would occur within 50 feet of an orchard or agricultural field, or within 25 feet of any surface water. Additionally, prior to implementation of the proposed project, the Ventura County Agricultural Commissioner would review and approve a written recommendation for herbicide use, as prepared by a Pest Control Advisor who holds a Qualified Applicator License or a Qualified Applicator Certificate from the California Department of Pesticide Regulation. Through implementation of the VCWPD's standard herbicide use restrictions and the Ventura County Agricultural Commissioner's review and approval process, potential impacts to agricultural water supply quality would be minimized. Impacts would be less than significant.

Cumulative Impacts. Initial Study Section B.1, as supported by Appendix 2, provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. Cumulatively significant impacts could occur if local water purveyors are not able to meet future water supply demands while maintaining the quantity and quality of water required for existing agricultural operations. As addressed in Section B.7A, one currently pending project involves the construction of a hay barn on agricultural property. However, due to its nature, construction and operation of the barn would not be anticipated to affect agricultural water supplies. Additionally, due to their nature, the other recently approved and pending projects within the proposed project area would not be anticipated to substantially affect agricultural water supplies or quality. Under the proposed project, no impacts to the quantity of agricultural water supplies would occur, and potential impacts associated with the quality of agricultural water supplies would be less than significant. As such, the proposed project's incremental contribution to agricultural water supply impacts would not be cumulatively considerable. Cumulative impacts would be less than significant.

B.7C Agricultural Air Quality/Microclimate

Proposed Project Impacts. Air quality and microclimate for agricultural resources relates to the meteorological conditions of an agricultural area that fosters the growing of crops; factors that may adversely affect agricultural air quality and microclimate include dust, reduced solar access, the elimination of windbreaks, or any other use that could cause a substantial adverse air quality or microclimate change (County of Ventura, 2006).

The proposed project would not involve the elimination of windbreaks or the construction of structures that could block or otherwise reduce solar access to an agricultural area. During the proposed project's initial phase, implementation of Mitigation Measures AQ-1 through AQ-4, as outlined in Section B.3 (Air Quality), would ensure that all potential air quality impacts are reduced to a level of less than significant. Additionally, since project-related traffic would be limited to paved surfaces and road shoulders and removal activities within the targeted creek reaches would not involve any grading or subsurface disturbances, no dust-related nuisances, as defined by Ventura County APCD Rule 51, would occur. During the project's re-treatment phase, potential air quality impacts would be less than significant or none. Therefore, along the creek reaches targeted for giant reed removal, the proposed project's potential impacts to the air quality and microclimate of nearby orchard operations would be less than significant.

At Soule Park, cut biomass would be chipped, and an area for both chipping and project-related equipment and materials staging would be necessary. As discussed in Initial Study Section A.8 (Surrounding Land Uses and Setting), no agricultural uses are located in the vicinity of Soule Park. Therefore, any dust generated by chipping operations would not impact the air quality or microclimate of agricultural land uses. No impacts would occur.

It is anticipated that project-related activities would end in 2012. Therefore, no long-term impacts to agricultural air quality and microclimate would occur.

Cumulative Impacts. Section B.1 of this Initial Study, as supported by Appendix 2, provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. Although these projects may result in some air quality impacts, as addressed in Initial Study Section B.3 (Air Quality), no significant cumulative impacts related to air quality would occur during implementation of the proposed project. Additionally, agricultural air quality and microclimate impacts associated with implementation of the proposed project itself would be less than significant or none. Therefore, the proposed project would not combine with other past, present or reasonably foreseeable projects in a manner that would create significant cumulative impacts related to agricultural air quality and microclimate. Cumulative impacts would be less than significant or none.

B.7D Pests and Diseases

Proposed Project Impacts. Potential impacts associated with pests and diseases involve the direct or indirect introduction of biological organisms that may be harmful to agricultural production (County of Ventura, 2006). The indirect introduction of such organisms may occur if a proposed use causes a decrease in the beneficial organisms or the natural or man made protections against harmful biological organisms (County of Ventura, 2006).

The proposed project involves the removal of non-native plant species from targeted reaches of McNell, Thacher and Reeves Creeks and that segment of upper San Antonio Creek which is located within and north of Soule Park and Soule Park Golf Course. The removal of plant materials from these creeks would not involve any activities that could generate biological waste products or standing water that could cause risks to agricultural uses or livestock populations due to diseases or pests. At Soule Park, the chipping of plant material would be anticipated to occur approximately once every seven to ten calendar days. The chipped material would be expected to be spread as mulch or trail cover soon after it is generated; however, if chipped material is stockpiled for an extended period of time it would be monitored for odors, re-sprouting and decomposition. In the unlikely event that decomposition or odors were to occur, the stockpiles would be spread out to eliminate potential decomposition risks. Additionally, it is noted that no agricultural activities or livestock operations occur within or adjacent to Soule Park. Consequently, proposed project activities at the park would not cause pest populations or disease colonies that could affect agricultural resources. No impacts would occur.

Cumulative Impacts. Initial Study Section B.1, as supported by Appendix 2, provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. Due to their nature, theses projects would not be expected to include components that could generate pests or diseases that could impact agricultural uses and operations. Additionally, as addressed above, the proposed project would not create impacts associated with pests and diseases. Consequently, it would

not incrementally contribute to impacts related to pests and diseases that would be cumulatively considerable. No cumulative impacts would occur.

B.7E Land Use Incompatibility

Proposed Project Impacts. According to the Ventura County *Initial Study Assessment Guidelines*, land use incompatibility impacts may occur if a proposed land use, due to its nature, design or operation, would be incompatible with nearby agricultural production due to issues such as vandalism or pilferage, or if agricultural operations would adversely affect the subject land use due to issues such as chemical spraying (County of Ventura, 2006).

Existing agricultural uses occur adjacent to segments of McNell, Thacher, and Reeves Creeks (primarily orchard uses). The physical removal of non-native plant species adjacent to agricultural uses would not, in itself, be incompatible because it would not result in the direct or indirect conversion, preclusion, or disruption of agricultural operations. Additionally, affected property owners would be notified of proposed activities in advance of their implementation, and permission for project-related workers to access agricultural properties would be secured in advance; no public access to these properties is proposed. Therefore, the proposed project would not introduce an opportunity for vandalism, pilferage or other adverse activity.

The proposed project would involve the application of herbicides during both its initial and re-treatment phases. The majority of these applications would use a "cut and daub" treatment, although foliar spraying is proposed as well. However, as addressed in Section B.7A (Agricultural Soils) and B.7B (Agricultural Water), impacts associated with proposed herbicide applications would be less than significant. Therefore, no substantial incompatibilities with existing agricultural uses would occur. Additionally, through its notification process, agricultural property owners would be able to notify the VCWPD of any planned chemical applications of their own, and arrange for proposed project activities to avoid these application periods. Therefore, the proposed project would not be expected to conflict with existing agricultural land uses. Impacts would be less than significant.

Cumulative Impacts. Section B.1 of this Initial Study, as supported by Appendix 2, provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. As addressed in Section B.7A, one currently pending project involves the construction of a hay barn. However, construction and operation of the barn would be located on a parcel that is specific to agricultural uses; therefore no conflicts would occur. Due to their nature, none of the other past, present or reasonably foreseeable projects outlined in Section B.1 would be anticipated to substantially conflict with agricultural uses; no cumulatively significant adverse impacts associated with agricultural uses would be expected during the proposed project's implementation. Additionally, the proposed project would not substantially conflict with agricultural uses. Therefore, its incremental contribution to conflicts with agricultural uses would not be cumulatively considerable. Cumulative impacts would be less than significant or none.

B.8 VISUAL RESOURCES

Within the project area, giant reed and castor bean removal would occur along McNell, Thacher and Reeves Creeks and that segment of upper San Antonio Creek which is located within and north of Soule Park and Soule Park Golf Course. The proposed project area is located within the Ojai Valley and is accessed via State Highways 33 and 150. The overall visual character of the proposed project area is typified as being rural to semi-rural.

B.8A Scenic Highways

Proposed Project Impacts. According to the Ventura County *Initial Study Assessment Guidelines*, a proposed project would have an impact on designated scenic highways if it would degrade visual resources or significantly alter or obscure public views from a designated or eligible scenic highway (County of Ventura, 2006). This impact is to be determined if the foreground viewshed of a project is generally within one-half mile of either side of a designated or eligible scenic highway (County of Ventura, 2006).

The nearest eligible State Scenic Highway to any portion of the proposed project area is California State Highway 33; the nearest stretch of this highway to the proposed project area is located approximately two miles to the west (Caltrans, 2008). Therefore, no portion of the proposed project area would be within the viewshed of State Highway 33. No impacts to a designated or eligible scenic highway viewshed would occur.

Cumulative Impacts. Initial Study Section B.1, as supported by Appendix 2, provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. As addressed above, the proposed project would not impact a designated or eligible scenic highway viewshed. Consequently, it would not to incrementally contribute to cumulative scenic highway impacts. No cumulative impacts would occur.

B.8B Scenic Areas/Features

Proposed Project Impacts. According to the Ventura County *Initial Study Assessment Guidelines*, a project would have an impact on scenic areas or features if it would degrade visual resources or significantly alter or obscure public views (County of Ventura, 2006). The proposed project area contains existing creeks and their vegetated banks. Land uses within the viewing area of these creeks are predominantly semi-rural and rural in nature and include agriculture, single family residential homes and private institutions. Residential homes are located in the proposed project area, some of which would have views of the targeted removal areas. However, the existing vegetation along the creek banks, in combination with the depressed nature of the creek waterways, would likely prevent full views of the removal areas from these homes.

Initial removal activities would take an estimated eight weeks, or 35 to 40 working days, to complete. No heavy equipment would be required and no sub-surface disturbances would occur. During this time, locations with full and partial views of the targeted creek areas would observe workers removing giant reed and castor bean seed heads. Workers would cut giant reed within six inches of grade and apply herbicide on the remaining stalk. A colorant, such as Blaz-on®, would be added to the herbicide solution to identify treated plant material. While this colorant would likely be visible along the creek

banks, this visual disturbance would be temporary and diminish as the plant stalk erodes and is replaced with native vegetation. Giant reed and castor bean treated with foliar spray herbicide would die within an estimated two months. The dead plant material may be left in place. However, its presence would blend in with the native vegetation and natural appearance of the subject creek beds and banks, and, with time, would biodegrade and be replaced with native vegetation, which would restore and enhance adjacent viewsheds. Therefore, less than significant scenic area and feature impacts would occur during removal activities, and beneficial impacts would occur following project completion.

All cut biomass would be transported to Soule Park for chipping, and an area for both chipping and project-related equipment and materials staging would be necessary. It is estimated that one or two chippers would be required for the project. Chippers range in size as a function of their chipping capacity; the larger the chipping capacity, the larger the size of the chipping equipment. Commercial chippers can be as large as 15 feet in length, eight feet in height and six feet in width and as small as four feet in length, five feet in height and three feet in width. The exact size of the chipper(s) used for the proposed project will be determined by the chipping contractor. Over the eight-week removal period, the chippers would be operated approximately every seven to ten working days. During this time, temporary scenic area and visual impacts would occur to viewsheds adjacent to and within Soule Park. Upon the completion of chipping activities, the visual integrity of Soule Park would be returned to its original state. Therefore, less than significant temporary scenic area and feature impacts would occur to viewsheds adjacent to and within Soule Park at the chipping location during the proposed project's initial phase. No impacts would occur within the park following the completion of chipping activities.

Cumulative Impacts. Section B.1 of this Initial Study, as supported by Appendix 2, provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. Implementation of the recently approved and pending projects associated with the proposed project area would be expected to result in temporary scenic area and feature impacts due to construction-related activities; however, due to their scale and nature, they would not be anticipated to combine and result in any long-term adverse, significant cumulative impacts. Implementation of the proposed project would result in an overall beneficial change to the existing visual character of the proposed project area, including the viewsheds of residential homes and users of the open space areas adjacent to, and along, upper San Antonio, McNell, Thacher and Reeves Creeks. Consequently, the proposed project would incrementally contribute to scenic area or feature impacts that would be cumulatively considerable. No cumulative impacts would occur.

B.9 PALEONTOLOGICAL RESOURCES

Proposed Project Impacts. According to the Ventura County *Initial Study Assessment Guidelines*, fossil remains are considered important if they are: (1) well preserved; (2) identifiable; (3) type/topotypic specimens; (4) age diagnostic; (5) useful in environmental reconstruction; (6) represent rare and/or endemic taxa; (7) represent a diverse assemblage; and, (8) represent associated marine and nonmarine taxa (County of Ventura, 2006). Vertebrate and megainvertebrate fossils are considered highly important because they are comparatively rare and allow precise age determinations and environmental reconstructions for the strata in which they occur; microinvertebrate fossils (microfossils) are much more abundant and, for this reason and because of their small size, would not be adversely impacted to the same degree as vertebrate and megainvertebrate fossils (County of

Ventura, 2006). Direct impacts to paleontological resources include grading and excavation of fossiliferous rock, which can result in the loss of scientifically important fossil specimens and associated geological data. Indirect impacts include increased access opportunities and unauthorized collection of fossil materials (County of Ventura, 2006).

McNell, Thacher, Reeves and upper San Antonio Creeks traverse through alluvial and colluvial deposits (undivided), alluvial deposits (undivided), alluvial sand deposits, alluvial fan deposits, and the Coldwater Sandstone Formation; the creek channels themselves are active wash deposits comprised of unconsolidated silt, sand and gravel (Tan and Irvine, 2005). Areas associated with the Coldwater Sandstone formation located within those creek reaches targeted for giant reed and castor bean removal include the northern-most portion of McNell Creek (west of Thacher School) and the northern-most portion of the Reeves Creek tributary located east of McAndrew Road. According to the Ventura County *Initial Study Assessment Guidelines*, the Coldwater Sandstone Formation is ranked "Low" in regard to paleontological importance.

The paleontological importance of the alluvial and colluvial desposits, alluvial deposits, alluvial sand deposits, and alluvial fan deposits traversed by McNell, Thacher, Reeves and upper San Antonio Creeks is ranked as "Undetermined" by the Ventura County *Initial Study Assessment Guidelines*. The Sespe, Monterey, Rincon Shale and Vaqueros formations occur south of Thacher Creek (Tan and Irvine, 2005); the paleontological importance of these formations is considered "High," "Moderate," "Low" and "Moderate to High," respectively, in the Ventura County *Initial Study Assessment Guidelines*. The Coldwater Sandstone and Sespe formations additionally occur north of Reeves Creek (Tan and Irvine, 2005). The Coldwater Sandstone and Cozy Dell Shale formations occur north of Thacher Road (Tan and Irvine, 2005), the latter of which, within the Ventura County *Initial Study Assessment Guidelines*, is considered to have "Low" paleontological importance. Although there are areas of "High," "Moderate" and "Moderate to High" paleontological importance within the proposed project area, the most commonly encountered vertebrate fossils (unidentifiable fragments of bone) of the project area typically hold little, if any, scientific value (Wyss, 2008). Within the proposed project area the occurrence of significant fossil vertebrates and megainvertebrate is considered very rare, as noted in the Ventura County *Initial Study Assessment Guidelines*. Moreover, even if significant fossil remains have been recovered from one locale in a particular formation (for example, Tapo Canyon in the Sespe Formation), this does not indicate that the formation is necessarily fossiliferous throughout its geographic distribution (Wyss, 2008). As such, the paleontological importance of the alluvial and colluvial deposits associated with proposed project's creek reaches is considered to be low.

As addressed in Section A.7 (Project Description) project-related activities would not involve any grading or below grade excavation; consequently, the potential to unearth fossils that are of scientific value would be highly unlikely, particularly given that the paleontological importance of the lands traversed by the subject creeks is considered low. Additionally, no aspect of the proposed project would increase the public's ability to access McNell, Thacher, Reeves and upper San Antonio Creeks, or any other area that is considered to have a high, moderate, or moderate to high paleontological importance; therefore, the proposed project would not provide any opportunities for the unauthorized collection of fossil materials. Impacts to paleontological resources are thus considered to be less than significant. Nevertheless, in accordance with the recommendations of the Ventura County *Initial Study*

Assessment Guidelines, the following mitigation measure would be implemented in the unlikely event that fossil remains are encountered:

MM P-1 If fossil remains are found during project implementation, the on-site supervisor shall contact an approved paleontological consultant immediately. The on-site supervisor shall additionally divert all project-related activities to other areas until the identified fossil materials have been evaluated by the paleontological consultant, who will determine if further mitigation measures are warranted.

Cumulative Impacts. According to the Ventura County *Initial Study Assessment Guidelines*, cumulative impacts associated with paleontological resources include all projects that contribute to the progressive loss of exposed rock in Ventura County which can be studied and prospected for fossil remains. Section B.1 of this Initial Study, as supported by Appendix 2, provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. Cumulatively significant impacts could occur if these projects either (1) consistently result in the discovery (and possible damage) of fossil remains, or (2) consistently occur within area's that are considered to have a "High," "Moderate to High," or "Moderate" paleontological importance. As addressed above, the proposed project's impacts on paleontological resources would be less than significant or none. Additionally, in the very unlikely event of a fossil remains discovery, Mitigation Measure P-1 would be implemented to ensure that no significant and unavoidable impacts would occur. Therefore, the proposed project would not incrementally contribute to impacts related to paleontological resources in a manner that would be cumulatively considerable. Cumulative impacts would be less than significant.

B.10 CULTURAL RESOURCES

A cultural resources records search for the proposed project was completed at the South Central Coastal Information Center (SCCIC) of the California State University at Fullerton in September 2008. The search included a review of all recorded archaeological sites within one-half mile of the proposed project area, all cultural resources reports on file with the SCCIC, the listings of the California Register of Interest (PHI), California Historical Landmarks (CHL), and California Register of Historic Resources Inventory (HRI). In addition, a Native American Heritage Commission (NAHC) sacred lands file search for the project was conducted in August 2008. The following discussions are based upon these efforts, and their associated summary reports are on file with the VCWPD.

B.10A Archaeological Resources

Proposed Project Impacts. According to the Ventura County *Initial Study Assessment Guidelines*, there is a high probability that an archaeological resource is of significant value if it: (1) contains information needed to answer important scientific research question and that there is a demonstrable public interest in that information; (2) has a special and particular quality such as oldest of its type or best available example of its type; and/or, (3) is directly associated with a scientifically recognized important prehistoric or historic event or person (County of Ventura, 2006).

Seven archaeological sites (56-000061, 56-000129, 56-000136, 56-000189, 56-0000190, 56-001109 and 56-001779) have been identified within one-half mile of the proposed project reaches; however, none of the sites are located within those creek reaches that have been targeted for giant reed and castor bean removal. None of the above-referenced archaeological sites are listed on the Archaeological

Determination of Eligibility, and no isolates have been identified within one-half mile of the proposed project area.

In addition, 29 cultural resources investigations have been conducted within one-half mile of the proposed project area; of these, six were located within the proposed project area. An additional 16 investigations have been conducted within the Matilija and Ojai United States Geological Survey (USGS) 7.5 minute Quadrangle. However, the results of these investigations have not been mapped due to insufficient location information (SCCIC, 2008).

The proposed project involves the removal of non-native vegetation within the targeted creek reaches of the upper San Antonio Creek watershed. The project would not involve any grading or below grade excavation and thus would have no potential to unearth archaeological resources of significance. Additionally, as the proposed project's cultural resources records search concludes, there are no known archaeological sites within the subject area that may be impacted by project implementation. However, not all lands that would be subject to giant reed removal have been surveyed for archaeological resources; consequently, there is a slight possibility that surface archaeological resources could be discovered during project-related activities within the targeted creek beds and banks. In the event that such resources are discovered, the following mitigation measure would be implemented:

MM C-1 In the event that archaeological resources are found during project implementation, the on-site supervisor shall contact an approved archaeological consultant immediately. The on-site supervisor shall additionally divert all project-related activities to other areas until the discovery has been evaluated by the approved archaeological consultant, who will determine if further mitigation measures are warranted.

With implementation of MM C-1, impacts to archaeological resources would be less than significant.

Cumulative Impacts. Section B.1 of this Initial Study, as supported by Appendix 2, provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. Within the proposed project area, some past, present and reasonably foreseeable projects involve earth disturbing activities that could potentially impact significant archaeological resources. However, as addressed above, it is highly unlikely that the proposed project would affect archaeological resources, and, in the event that a discovery is made, MM C-1 would be implemented to ensure that potential effects are less than significant. Therefore, the proposed project's incremental contribution to archaeological resources impacts would not be cumulatively considerable. Cumulative impacts would be less than significant or none.

B.10B Historic Resources

Proposed Project Impacts. According the Ventura County *Initial Study Assessment Guidelines*, the significance of an historic resource is materially impaired when a project demolishes or materially alters, in an adverse manner, those physical characteristics of an historical resource that: (1) convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources; or, (2) account for its inclusion in a local register of historical resources pursuant to Section 5020.1(k) requirements of Section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or, (3) 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 (County of Ventura, 2006).

In addition to the seven archaeological sites referenced in Section B.10A, eight historic resources (56-151031, 56-151050, 56-151052, 56-151053, 56-151054, 56-152404, 56-152503 and 56-152505) have been identified within one-half mile of the proposed project area; however, none of these sites are located within those creek reaches targeted for non-native plant removal. A review of historic maps (1903 and 1947) indicate that in 1903 there were 21 unimproved roads, ten improved roads, 55 structures, one railroad line and five creeks located within one-half mile of the proposed project area. Of these, three of the creeks, four of the improved roads, and seven of the unimproved roads traversed the proposed project area. In 1947 there were 15 unimproved roads, 22 improved roads, 120 structures, one railroad line and five creeks within one-half mile of the proposed project area. Three of the recorded creeks, 11 of the improved roads, and eight of the unimproved roads intersected or traversed a portion of the proposed project area.

The California PHI and CHL and National Register of Historic Places list no historic properties within one-half mile of the proposed project area. However, the California HRI lists six properties within one-half mile of the proposed project area. These properties have been determined to have a National Register of Historic Places Status of 1 or 2, a California CHL numbering of 770 or higher, and a California PHI listed after January 1, 1998. In addition, the California HRI lists 177 properties that have been evaluated for historic significance.

As addressed in Section A.7 (Project Description), the proposed project involves the removal of non-native plant species from targeted reaches of McNell, Thacher and Reeves Creeks and that segment of upper San Antonio Creek which is located within and north of Soule Park and Soule Park Golf Course. Implementation of the proposed project would not involve any grading or subsurface excavation; additionally, it would not involve the modification or demolition of any structures. Transportation of removed vegetation to Soule Park would occur along improved roads using standard small dump or flatbed tucks that would not be anticipated to result in any road surface damage. Therefore, the proposed project would have no impact on known or potential historic resources located within the proposed project area.

Cumulative Impacts. Initial Study Section B.1, as supported by Appendix 2, provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. Although these projects could potentially impact historic resources, either individually or cumulatively, the proposed project would not affect historic resources. Consequently, it would not incrementally contribute to impacts related to historic resources in a manner that would be cumulatively considerable. No cumulative impacts would occur.

B.10C Ethnic, Social and Religious Resources

Proposed Project Impacts. The Ventura County *Initial Study Assessment Guidelines* provides the following definitions for ethnic, social and religious resources (County of Ventura, 2006):

- **Ethnic/Social Resources:** Unique material/organizational expressions of ethnic and group values, particularly those relating to Native Americans, Hispanic, Black and Oriental ethnic groups, but can also be expanded to include other ethnic groups.

- **Religious Resources:** Places of worship, areas of activity, shrines, features of religious devotion, or areas of procurement for religious articles that maintain religious values.

Due to their nature, the Ventura County *Initial Study Assessment Guidelines* further states that "definitive, quantitative methods cannot be used to measure or determine significance of impacts to these resources, therefore, impacts and their significance must be evaluated and determined on a case-by-case basis" (County of Ventura, 2006).

Within the proposed project area there are four social, ethnic and religious facilities, including: Christ Church (1290 Grand Avenue); Our Lady and All Angels (1502 East Ojai Avenue); St. Joseph's Health and Retirement Center (2464 East Ojai Avenue); and, Meditation Mount (10340 Reeves Road). There are additionally several public and private schools located within one-half mile of the proposed project area that potentially could be used for either ethnically-oriented functions or social events, including San Antonio Elementary School (650 Carne Roadrand Avenue), Monica Ros School (783 McNell Road), Thacher School (5025 Thacher Road), and Ojai Valley Upper School (10820 Reeves Raod). Soule Park and Golf Course may also be used periodically for ethnically-oriented social functions or religious ceremonies, such as weddings.

In addition to the above resources, a Native American Heritage Commission (NAHC) sacred lands file search for the proposed project area was completed in August, 2008. A copy of the findings of the file search is on file with the VCWPD. The file search did not identify any sacred lands within the proposed project area. However, at the suggestion of the NAHC, applicable Native American individuals and organizations were contacted by mail on November 14, 2008; the purpose of the contact was to communicate activities associated with the proposed project and provide an opportunity to express any concerns. On November 24, 2008 Mr. Pat Tumamait, a Chumash consultant, requested additional information on the project due to a known location near the proposed project area that contains sensitive cultural resources. The area of concern noted by Mr. Tumamait was confirmed on December 8, 2008 (Aspen Environmental Group, 2008); although the area is located along upper San Antonio Creek, no giant reed targeted for removal is in close proximity to it. To date no other Native American inquiries have been received.

As addressed under Sections B.10A and B.10B, the proposed project would not involve any earth disturbance and would not be located within any known sacred lands. Proposed project activities would be completed over the course of 35 to 40 working days, and working hours would occur between Monday and Friday, from 7:00 a.m. to 5:00 p.m. Proposed chipping activities within Soule Park would be coordinated with the Ventura County Parks Department to ensure that project-related activities do not conflict with scheduled park events. Although some ethnic, social and religious events may occur during the work week, the majority would occur either on the weekends, or during week-day and weekend evening hours. Additionally, site-specific project activities along the targeted creek reaches would not be expected to take longer than several hours (two to eight hours) to several days (two to three days) to complete. Therefore the proposed project would not be expected to substantially interfere with or affect ethnic, social or religious resources. Impacts would be less than significant.

Cumulative Impacts. Section B.1 of this Initial Study, as supported by Appendix 2, provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. Within the proposed project area, some past, present and reasonably foreseeable projects that

involve either earth disturbing activities or heavy equipment operations for extended periods of time could potentially impact ethnic, social or religious resources. However, the proposed project would be short-term in nature (35 to 40 working days) and, as addressed above, would not substantially affect ethnic, social or religious resources. Therefore, its incremental contribution to impacts related to ethnic, social or religious resources would not be cumulatively considerable. Cumulative impacts would be less than significant.

B.11 ENERGY RESOURCES

Energy resources include all sources of power necessary to operate and maintain human activities and various modes of transportation in order to maintain society's way of life (County of Ventura, 2006). The four main energy resources identified in the Ventura County *Initial Study Assessment Guidelines* include solar, wind, hydraulic and petroleum. As related to solar, wind and hydraulic resources, the Ventura County *Initial Study Assessment Guidelines* state that no individual project would have a significant impact because these energy types are renewable (County of Ventura, 2006); therefore, no thresholds of significance are provided. Section 5.b (Petroleum Resources) of the Ventura County *Initial Study Assessment Guidelines* similarly states that no individual project would have a significant impact on the demand for petroleum resources because petroleum resources are considered world-wide, national and State-wide resources that are beyond the scope of local governments to effectively manage or control (County of Ventura, 2006); as such, no thresholds of significance are provided. In lieu of any specific thresholds of significance for energy resources, for the purposes of this Initial Study, a proposed project would be considered to have a significant impact on energy resources if it would encourage activities that result in either the use of large amounts of fossil fuel (petroleum resources), or the use fossil fuel in a wasteful manner.

Proposed Project Impacts. The proposed project would use petroleum resources to operate vehicles and equipment for giant reed and castor bean removal and chipping activities. However, initial removal activities would not be expected to require more than 35 to 40 working days to complete, and the number of project-related vehicles and equipment required for its implementation would be minimal. Following completion of the project's initial removal phase, herbicide re-treatments would require no more than three crews working for an estimated ten working days; depending on site-specific conditions, these re-treatment efforts would occur up to four times annually through 2012, although re-treatments would be expected to diminish as native vegetation re-establishes in the targeted removal areas. Consequently, while the proposed project would require the consumption of petroleum resources, this consumption would be short-term in nature and the amount of fuel required would not be substantial, at either local or regional scales. Therefore, during project implementation impacts to energy resources would be less than significant; and following project completion, no impacts to energy resources would occur.

Cumulative Impacts. The proposed project would be cumulatively significant if it would contribute to the depletion of energy resources in a way that would prevent or impede the operation and maintenance of current human activities. As outlined in Initial Study Section B.1, none of the past, present or reasonably foreseeable projects within the proposed project area would be anticipated to have a direct impact on solar, wind, or hydraulic energy resources, as these are renewable sources of energy. However, the majority of these projects would, in some way, likely draw on petroleum resources. Given that petroleum is a limited energy resource, it may be possible for these projects to

combine in a manner that would be cumulatively considerable. However, activities associated with the proposed project would not substantially deplete non-renewable energy resources due to their limited duration. Upon completion of the project, no change to existing consumption levels of non-renewable energy resources would occur. Therefore, the proposed project would not be expected to incrementally contribute to impacts related to energy resources that would be cumulatively considerable. Cumulative impacts would be less than significant.

B.12 COASTAL BEACHES AND SAND DUNES

Proposed Project Impacts. According to the Ventura County *Initial Study Assessment Guidelines*, a project would have the potential to create direct or indirect impacts to coastal beaches and sand dunes if it: (1) resulted in the physical removal or modification of a beach or sand dune; (2) introduced barriers to sand replenishment; or, (3) disturbed dune vegetation (County of Ventura, 2006).

The proposed project would involve the removal of giant reed and castor bean within the upper San Antonio Creek watershed. The nearest coastline is located approximately 11 miles southwest of the project area (DeLorme, 2000). Given its distance from coastal areas, proposed giant reed removal activities would not directly affect County beaches or sand dunes. It is noted, however, that during peak storm events, giant reed can be transported along the entire length of the Ventura River and recolonize along coastal beaches and sand dune areas. Implementation of the proposed project would reduce the total volume of giant reed that could recolonize in these areas, thereby resulting in a net beneficial impact, both ecologically and within the context of lessening the efforts needed to remove it. No adverse impacts would occur.

Cumulative Impacts. Initial Study Section B.1, as supported by Appendix 2, provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. Given their distance from the coast, none of these projects would be expected to impact beach areas or sand dunes, either directly, indirectly or cumulatively. As addressed above, implementation of the proposed project would not adversely impact any coastal beaches or sand dunes; long-term indirect impacts would be beneficial. Therefore, the proposed project would not incrementally contribute to impacts related to coastal beaches or sand dunes in a manner that would be cumulatively considerable. No cumulative impacts would occur.

B.13 SEISMIC HAZARDS

B.13A Fault Rupture

Proposed Project Impacts. As described in the Ventura County *Initial Study Assessment Guidelines*, a project is potentially at risk with respect to fault rupture if it is located within: (1) a State of California designated Alquist-Priolo Special Fault Study Zone; (2) a County designated Fault Hazard Area; or, (3) a County designated Potential Fault Hazard Area (County of Ventura, 2006).

Several major fault systems transect Ventura County from east to west (County of Ventura, 2005). The eastern portion of the proposed project area would be located approximately one mile west of an earthquake fault zone, as delineated in Figure 2.2.3b (Earthquake Fault Hazard Zones) of the Ventura County *General Plan Hazards Appendix* (County of Ventura, 2005). Potentially active faults that are

located in the vicinity of the project area include the following (California Geological Survey [CGS], 2005):

- **Santa Ana Fault:** This fault is located less than 0.1 mile from the proposed project area;
- **San Cayetano Fault:** This fault is located approximately 0.3 mile from the proposed project area;
- **Lion Fault:** This fault is located approximately 1.2 miles from the proposed project area;
- **Big Canyon Fault:** This fault is located approximately 2.1 miles from the proposed project area;
- **Sisar Fault:** This fault is located approximately 2.3 miles from the proposed project area; and,
- **Sulphur Mountain Fault:** This fault is located approximately 2.8 miles from the proposed project area.

According to the CGS, a project that involves the construction or modification of any high-rise buildings or other critical or sensitive structures may require a detailed fault investigation (CGS, 2002a). However, the proposed project would not necessitate the construction or modification of any building or structure. As the proposed project is not located directly within an earthquake fault zone, and would not involve the construction or modifications of structures, no impacts associated with fault rupture would occur.

Cumulative Impacts. Section B.1 of this Initial Study, as supported by Appendix 2, provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. As discussed above, the proposed project would not be located within an earthquake fault zone and would not involve the construction or modification of structures. Therefore, it would not incrementally contribute to cumulative impacts associated with fault rupture. No cumulative impacts would occur.

B.13B Ground Shaking

Proposed Project Impacts. Ground shaking describes the seismic waves that are created from an earthquake, which can: cause damage to structures, utilities, and transportation corridors; cause landslides, rockfalls and embankment failures; and, induce liquefaction failure (County of Ventura, 2006). Ground shaking is measured in terms of the peak ground acceleration, and is quantified in "g's," which denotes a fraction of percent of gravitational acceleration. The highest amplification of ground shaking in Ventura County occurs within the San Andreas Fault zone located in the north, and within the Oakridge Fault zone located in the southeast (County of Ventura, 2005). Depending on the specific location of a project, anticipated peak ground acceleration range from 0.35g to 1.05g (0.35 to 1.05 times the acceleration due to gravity) (County of Ventura, 2005). According to Figure 2.3b (Groundshaking) of the Ventura County *General Plan Hazards Appendix*, the anticipated peak ground acceleration for the proposed project area is 0.65g (County of Ventura, 2005).

Impacts associated with ground shaking primarily result from damage to, or collapse of, buildings or other structures. The proposed project would not involve the construction or modification of any structures, nor would it require any grading activities. However, portions of the proposed project area are located within potential liquefaction zones and the hazard impacts associated with liquefaction would be less than significant.

Cumulative Impacts. Initial Study Section B.1, as supported by Appendix 2, provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area.

Combined, these projects could potentially be impacted by ground shaking and liquefaction in a manner that is cumulatively considerable. However, as addressed above, liquefaction impacts associated with the proposed project would be less than significant. Therefore, the proposed project would not incrementally contribute to ground shaking or liquefaction impacts in a manner that would be cumulatively considerable. Cumulative impacts would be less than significant.

B.13C Tsunami

Proposed Project Impacts. A tsunami is a series of waves generated by an undersea disturbance, such as an earthquake or landslide. A project would be subject to a potential tsunami hazard if it is located less than 50 feet above sea level or within one mile of a coastal plain (County of Ventura, 2006). According to Figure 2.6 (Tsunami Inundation Hazard Areas) of the Ventura County *General Plan Hazards Appendix*, the proposed project area would not be located within a tsunami hazard area (County of Ventura, 2005). Therefore, the project would have no impacts associated with tsunamis.

Cumulative Impacts. Section B.1 of this Initial Study, as supported by Appendix 2, provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. None of these projects would be located within a tsunami hazard area, and, as addressed above, the proposed project would not have impacts associated with tsunamis. Therefore, there is no potential for these projects to combine in a manner that would cause a cumulative impact related to tsunamis. No cumulative impacts would occur.

B.13D Seiche

Proposed Project Impacts. Similar to a tsunami, a seiche is a series of waves caused by an earthquake, but these waves occur specifically within an enclosed or semi-enclosed body of water. A project would be subject to a potential seiche hazard if it is located within 10 feet vertical elevation from an enclosed body of water such as a bay, lake, or reservoir (County of Ventura, 2006). The nearest source for a potential seiche hazard in the project area would be Senior Canyon Reservoir; the reservoir is located approximately 0.4 mile (2,112 feet) north of the project area, along Ladera Road (Rand McNally, 2007). While the Ojai East Reservoir is located approximately 280 feet south of the project area at the intersection of McAndrew Road and Reeves Road (Aspen Environmental Group, 2008; Rand McNally, 2007), the surface water within this reservoir is entirely enclosed within a covered water tank, and therefore would not contribute to a seiche hazard. As the proposed project would not be located in the vicinity of a potential seiche hazard area, no impacts would occur.

Cumulative Impacts. Initial Study Section B.1, as supported by Appendix 2, provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. As discussed above, the proposed project would not be located within a seiche hazard area. Consequently, it would not incrementally contribute to impacts associated with a seiche that would be cumulatively considerable. No cumulative impacts would occur.

B.13E Liquefaction

Proposed Project Impacts. Liquefaction occurs in saturated soils, and is a process in which the strength and stiffness of the soil is reduced by ground shaking. While liquefaction can occur at any

ground depth, it usually occurs within the first 50 to 80 feet below the surface (County of Ventura, 2005). A structure that is located within a liquefaction zone may lose support under its foundation, which could cause the structure to tilt or settle into the ground surface and potentially collapse (County of Ventura, 2005).

As addressed above under Initial Study Section 13.B (Ground Shaking) portions of the project area would be located within a liquefaction zone, as determined by the CGS (CGS, 2002b). Proposed activities within the liquefaction zone would be limited to the removal of giant reed and castor bean along the McNell, Thacher, Reeves, and upper San Antonio Creeks. The proposed project does not involve the construction or modification of any habitable or rigid structures that would be susceptible to collapse from liquefaction, and would not require any grading or excavation. Consequently, impacts associated with liquefaction would be less than significant.

Cumulative Impacts. Section B.1 of this Initial Study, as supported by Appendix 2, provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. Combined, these projects could potentially be impacted by liquefaction in a manner that is cumulatively considerable. However, as addressed above, liquefaction impacts associated with the proposed project would be less than significant. Therefore, the proposed project would not incrementally contribute to liquefaction impacts in a manner that would be cumulatively considerable. Cumulative impacts would be less than significant.

B.14 GEOLOGIC HAZARDS

B.14A Subsidence Hazard

Proposed Project Impacts. Subsidence describes any settling or sinking of the land-surface elevation as a result of changes that take place underground, such as earthquakes or groundwater or oil extraction. Within Ventura County, subsidence is primarily occurring in the Oxnard Plain as a result of groundwater extraction (County of Ventura, 2005). The proposed project would not be located within a probable subsidence zone, as delineated in Figure 2.8 of the Ventura County *General Plan Hazards Appendix* (County of Ventura, 2005). Proposed project activities would involve the removal of giant reed in the upper San Antonio Creek watershed. Giant reed consumes more water than native riparian vegetation. Consequently, its removal is anticipated to slightly increase the amount of recharge to local groundwater aquifers. Therefore, the proposed project would have a beneficial impact in preventing potential subsidence. No adverse impacts would occur.

Cumulative Impacts. Initial Study Section B.1, as supported by Appendix 2, provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. As discussed above, the proposed project area would not be located within a probable subsidence zone. Consequently, it would not combine with past, present of reasonably foreseeable projects to contribute to a subsidence-related impact that would be cumulatively considerable. No cumulative impacts would occur.

B.14B Expansive Soils Hazards

Proposed Project Impacts. Expansive soils are primarily clay-rich soils that are subject to changes in volume with changes in moisture content, and the resultant shrinking and swelling of soils can influence fixed structures, utilities, and roadways (County of Ventura, 2006). Expansive soils are scattered throughout the County, and are present within portions of the Ojai Valley.

The soil within the project area is characterized by the following two types of earth material (CGS, 2005):

- **Alluvial and colluvial deposits (Qha):** This earth material is located on the floors of valleys and includes active stream deposits in hill slope areas. It is composed of unconsolidated sandy clay with some gravel.
- **Alluvial fan deposits (Qhf):** This earth material is deposited by streams emanating from mountain canyons onto alluvial valley floors. It is composed of moderately to poorly sorted, and moderately to poorly bedded, sandy clay with some gravel.

The primary impact associated with expansive soils is damage to structures. The proposed project would not involve the construction or modification of any structures, nor would it involve soil excavation. Therefore, no impacts associated with expansive soils would occur.

Cumulative Impacts. Section B.1 of this Initial Study, as supported by Appendix 2, provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. As addressed above, the proposed project would neither involve soil excavation, nor the construction or modification of any structures. As such, it would not combine with other past, present of reasonably foreseeable projects to contribute to an expansive soil-related impact that would be cumulatively considerable. No cumulative impacts would occur.

B.14C Landslide/Mudflow Hazard

Proposed Project Impacts. Landslides and mudflows generally occur near the base of hillsides where unstable conditions have been caused by channel erosion, weathering, and tectonic movement (County of Ventura, 2006). As shown in Figure 2.7.1b of the Ventura County *General Plan Hazards Appendix*, the proposed project area would not be located adjacent to a mapped landslide (County of Ventura, 2005). However, the proposed project activities located at the eastern end of Reeves Creek and Reeves Road would be located adjacent to a known earthquake-induced landslide area, as determined by the CGS (CGS, 2002).

The potential risks associated with landslides and mudflows concern development projects that would be located in hillside areas. Such development could be severely damaged or potentially destroyed by a landslide or mudflow. The proposed project would not involve any structural development or the modification of any existing development. As such, no impacts associated with landslides or mudflows would occur.

Cumulative Impacts. Initial Study Section B.1, as supported by Appendix 2, provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. The proposed project would not involve the construction or modification of any buildings or structures, nor would it involve development of a hillside area. Consequently, it would not incrementally contribute to

impacts associated with landslides or mudflows that would be cumulatively considerable. No cumulative impacts would occur.

B.15 HYDRAULIC HAZARDS

B.15A Erosion/Siltation

Proposed Project Impacts. Erosion and siltation hazards are prevalent throughout the County, and are managed through implementation of the measures outlined in the Ventura County Public Works Agency's *Flood Control District Standards and Specifications Design Manual* (County of Ventura, 2006). The proposed project would be undertaken by the VCWPD (formerly referred to as the Ventura County Flood Control District), and, as such, would inherently adhere to the Ventura County Public Works Agency's *Flood Control District Standards and Specifications Design Manual*.

Established stands of giant reed within creeks and rivers can divert water flows and cause bank erosion during storm events. The removal of these stands from the proposed project area would immediately decrease the potential for erosion and siltation within upper San Antonio, McNell, Thacher and Reeves Creeks, thereby resulting in a beneficial impact. No adverse impacts would occur.

Cumulative Impacts. Section B.1 of this Initial Study, as supported by Appendix 2, provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. As addressed above, the proposed project would have beneficial effects on erosion and siltation within the upper San Antonio Creek watershed. As such, it would not incrementally contribute to impacts related to erosion and siltation that would be cumulatively considerable. No cumulative impacts would occur.

B.15B Flooding Hazard

Proposed Project Impacts. As described in the Ventura County *Initial Study Assessment Guidelines*, flooding hazards are prevalent throughout the County, and are managed through implementation of the measures outlined in the Ventura County Public Works Agency's *Flood Control District Standards and Specifications Design Manual* (County of Ventura, 2006). The proposed project would be implemented by the VCWPD (formerly referred to as the Ventura County Flood Control District), and, as such, would inherently adhere to the Ventura County Public Works Agency's *Flood Control District Standards and Specifications Design Manual*.

Giant reed stems and rhizomes can be broken or uprooted and transported downstream during storm events, where they can form debris dams and damage existing infrastructure, such as bridge abutments and culverts. The removal of giant reed would immediately reduce these flood hazards both within the upper San Antonio Creek watershed, as well as downstream along the Ventura River. Consequently, the proposed project would have a beneficial effect on flood hazards. No adverse impacts associated with flooding hazards would occur.

Cumulative Impacts. Initial Study Section B.1, as supported by Appendix 2, provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. As addressed above, the proposed project would result in beneficial impacts related to flooding hazards.

Therefore, it would not incrementally contribute to flood hazard impacts that would be cumulatively considerable. No cumulative impacts would occur.

B.16 AVIATION HAZARDS

Proposed Project Impacts. Aviation hazards refer to the potential loss of life and/or property due to an aircraft accident, including any action which may cause an increase in the potential for an aircraft accident (County of Ventura, 2006a). There are four airports in Ventura County: the County-owned and operated Oxnard and Camarillo Airports; a private airport in Santa Paula; and, the federally-operated Point Mugu Naval Air Weapons Station (NAWS) (County of Ventura, 2006b). The nearest airport to the proposed project area is the Oxnard Airport, located approximately 10 miles southwest of the nearest branch of San Antonio Creek that is part of the proposed project. The proposed project area is not located within two miles of an existing airport or a privately owned landing strip; additionally, it is not located within the designated flight path of any local airport facility. As discussed in Section A.7 (Project Description), the proposed project does not involve the use or construction of any equipment, towers, or other structures that could obstruct or interfere with aviation activities. Therefore, the proposed project would not impact flight paths, or introduce an aviation hazard. No impacts would occur.

Cumulative Impacts. The proposed project would be cumulatively significant if it would contribute an incrementally adverse impact to the potential loss of life and/or property due to an aircraft accident, taking into consideration other cumulative projects in the area. Initial Study Section B.1, as supported by Appendix 2, provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. As outlined above, the proposed project would not result in impacts associated with aviation hazards. Consequently, it would not incrementally contribute to an aviation hazard impact that would be cumulatively considerable. No cumulative impacts would occur.

B.17 FIRE HAZARDS

Proposed Project Impacts. A fire hazard is the potential loss of life and/or property due to fire, including any action which may cause an increase of any fire hazard (County of Ventura, 2006). Fire hazard areas in Ventura County include areas where native brush grows in natural stands, such as undeveloped rural areas. The proposed project area is located in a high fire hazard area (County of Ventura, 2005a). Fire protection services for the proposed project area and its immediate vicinity are provided by the County of Ventura Fire Department and the California Department of Forestry and Fire Protection through an Automatic/Mutual Aid Agreement (County of Ventura, 2005b). The closest fire station to the proposed project area is the County of Ventura Fire Station Number 21, which is located at 1201 Ojai Avenue in the City of Ojai; it is approximately 1.5 miles west of the nearest section of San Antonio Creek that is part of the proposed project area (County of Ventura, 2008). The station is staffed daily by three firefighters and houses three pieces of equipment: a first run engine; a reserve pumper; and, a brush engine (County of Ventura, 2008).

Equipment used during initial removal activities and increased human activity within the targeted creek areas would increase the risk of fire ignition. Furthermore, foliar herbicide treatments would leave approximately five percent or less of all biomass associated with the project to dry on-site, thereby slightly increasing flammability in some areas. However, the VCWPD's contractor(s) would be

required to comply with applicable sections of the California Uniform Fire Code and adopted Ventura County Fire Protection District ordinances, standards and regulations. Adherence to these codes, ordinances, standards and regulations would include, but not be limited to:

- Materials that are susceptible to spontaneous ignition, such as oily rags, would be stored in appropriate containers and safeguards would be taken to minimize the risk of exposing combustible materials to unintended sources of ignition;
- Smoking would be prohibited except in approved areas;
- Leaking equipment would be immediately repaired and/or taken out of service;
- Fire protection equipment, including fire extinguishers, would be kept on site and inspected/maintained in accordance with applicable manufacturer recommendations;
- Readily accessible emergency telephone facilities would be provided to all work crews to immediately report fire ignition to "911" emergency response services;
- Internal-combustion-powered construction equipment would be used in a manner that ensures that: equipment is located so that exhausts do not discharge against combustible material; equipment is not refueled while in operation; and, fuel for equipment is stored in appropriate areas; and,
- Combustible debris, rubbish and waste material would be removed and/or appropriately stored at the end of each workday and would not be disposed of by burning.

Adherence to these types of standard requirements during project implementation would minimize the potential for wildfire ignition. As such, potential impacts of fire hazards associated with the proposed project would be less than significant and short-term in nature.

Although the proposed project area is within a high fire hazard area, the project itself does not involve the use or construction of any habitable structures or other features that would require significant fire protection services. Therefore, upon completion, the proposed project would not increase the demand for Fire Department equipment or personnel. Furthermore, as discussed in Section A.7.3 (Project Benefits), giant reed is highly flammable, and its removal within the project area would immediately lessen fire risks by reducing overall fuel loads (biomass). Therefore, long-term impacts related to fire hazard impacts would be beneficial.

Cumulative Impacts. Section B.1 of this Initial Study, as supported by Appendix 2, provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. The proposed project would be cumulatively significant if it would contribute an incremental adverse impact related to the potential loss of life and/or property due to a fire, or be the cause of an increase in fire hazards. As described above, the proposed project is located within a high fire hazard area, but would have a less than significant short-term impact to fire hazards during removal activities. Additionally, the proposed project would reduce the risk of fire hazards in the immediate vicinity of the proposed project area over the long-term. Therefore, its incremental contribution to fire hazard impacts would not be cumulatively considerable. Cumulative impacts would be less than significant.

B.18 HAZARDOUS MATERIALS/WASTE

Hazardous materials include any substance or combination of substances which, because of quantity, concentration, physical, chemical, or infectious characteristics, may cause mortality or illness, or pose a substantial threat to humans or the environment. Hazardous wastes include any substance that meets any of the criteria for the identification of a hazardous waste adopted by the State Department of Toxic

Substance Control pursuant to Section 25141, Division 20, Chapter 6.5 of the California Health and Safety Code (County of Ventura, 2006).

B.18A Above-Ground Hazardous Materials

Proposed Project Impacts. The improper storage, handling, use, or disposal of hazardous materials could result in the creation of adverse impacts to humans and the environment. As addressed in Section 18a of the Ventura County *Initial Study Assessment Guidelines*, the hazardous material impacts of a project must be decided on a case-by-case basis and depend on the: (a) individual or cumulative physical hazard of the material or materials; (b) amounts of material or materials on-site, either in use or storage; (c) proximity of the hazardous material or materials to populated areas and the compatibility of those materials with neighboring facilities; (d) federal, State, and local laws, and ordinances, governing the storage and use of hazardous materials; (e) potential for a spill or release; and (f) proximity of the hazardous material or materials to receiving waters or other significant environmental resources (County of Ventura, 2006).

As discussed in Section A.7 (Project Description), equipment and vehicles required for implementation of the proposed project would include: hand held equipment such as chain saws, loppers and power brush cutters; small loaders; trucks to transport cut vegetation to the chipping site; and, chippers. The equipment and vehicles required for project implementation would be powered by either diesel fuel or gasoline. Therefore, implementation of the proposed project would have the potential to cause small-scale hazardous materials spills related to fuels and other automotive and equipment fluids such as oils, lubricants, and hydraulic fluids. Should any hazardous material(s) be spilled or encountered during project implementation, the material(s) would be contained, removed and treated in accordance with standard VCWPD contract specifications and requirements, as well as federal, State and local laws, regulations and ordinances. Therefore, potential impacts associated with above-ground hazardous materials would be less than significant.

A glyphosate-based herbicide, such as Aquamaster®, would be used as part of the proposed project. Aquamaster® is approved and labeled for use near and in open water. Glyphosate is strongly absorbed by soil, with little potential for leaching to groundwater (USEPA, 2006a). As discussed in Section A.7 (Project Description), all herbicide applications would be completed or supervised on site by personnel holding either a Qualified Applicator License or a Qualified Applicator Certificate from the California Department of Pesticide Regulation. A Pest Control Advisor would also prepare a written recommendation for herbicide use for the VCWPD, which would be subsequently reviewed and approved by the Ventura County Agricultural Commissioner and then implemented. On-site supervisors would additionally ensure that specific manufacturer label specifications and safety measures are followed, and that the VCWPD's protocols to avoid herbicide drift into adjacent areas are implemented. Additionally, as noted in Initial Study Section A.9 (Other Agencies Whose Approval May Be Required), prior to project implementation the VCWPD would consult with the Ventura County Environmental Health Division to ensure that concerns related to hazardous materials and hazardous waste are fully addressed.

All of the applicable protocols specified in the *Plans and Specifications for the Matilija Dam Ecosystem Restoration Project Giant Reed Removal Project* (County of Ventura, 2007) would be implemented for the proposed project. To date, implementation of these protocols for the Matilija Dam Ecosystem

Restoration Project Giant Reed Removal Project have successfully controlled herbicide use; glyphosate has not been detected in surface water adjacent to targeted removal areas during post-application water quality monitoring. The inclusion of these measures would ensure that the use of glyphosate herbicide, as part of the proposed project, would result in less than significant above-ground hazardous materials impacts.

While giant reed and castor bean are considered noxious, they are not considered a hazard to public health. Therefore, the removed dead vegetation is not considered a hazardous material. All chipped material would be used by the Ventura County Parks Department for mulch, trail cover, and/or for other uses as identified by the Ventura County Parks Department. The chipping and staging area would be restricted to ensure public safety. Therefore, the removed biomass would not result in above-ground hazardous material impacts. No impacts related to the removed biomass would occur.

Cumulative Impacts. Section B.1 of this Initial Study, as supported by Appendix 2, provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. As described above, the proposed project would have less than significant impacts related to above-ground hazardous materials and wastes. These impacts would be temporary in nature; the initial phase of the proposed project would occur within an estimated 35 to 40 working days, and herbicide re-treatments would occur up to four times annually through the year 2012. As native vegetation re-emerges in the targeted creek areas, progressively fewer herbicide re-treatments would be needed. Upon completion of the proposed project, no impacts associated with above-ground hazardous materials would occur. Therefore, its incremental contribution to above-ground hazardous materials or waste impacts would not be cumulatively considerable. Cumulative impacts would be less than significant.

B.18B Hazardous Materials

Proposed Project Impacts. According to the Ventura County *Initial Study Assessment Guidelines*, a hazardous material means "any material that, because of its quantity, concentration, physical or chemical characteristics poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment" (County of Ventura, 2006).

The proposed project would not involve the installation of underground hazardous materials storage tanks, pipelines or fuel tanks. Proposed project activities would involve the removal of non-native vegetation from targeted reaches of McNell, Thacher, Reeves, and upper San Antonio Creeks. Due to the predominantly undeveloped nature of the subject creek reaches, it is unlikely that they contain any type of hazardous materials underground storage tanks or pipelines. However, even if such underground storage tanks or pipelines are present, the proposed project would not involve grading or subsurface excavation; consequently, the likelihood of encountering such a facility would be extremely low. No impacts related to hazardous materials underground storage tanks, pipelines or leaking underground fuel tanks are anticipated to occur.

The proposed project would involve the use of a glyphosate-based herbicide such as Aquamaster®. Glyphosate is a non-selective herbicide that readily and completely biodegrades in soil, and has little potential for leaching into groundwater (USEPA, 2006a). The half-life of glyphosate can range between three to 130 days, depending on site-specific soil structure, moisture, and temperature. Glyphosate-based herbicides are not restricted materials and are commonly used. In addition, all herbicide applications would be completed or supervised personnel holding either a Qualified Applicator License

or a Qualified Applicator Certificate from the California Department of Pesticide Regulation. On-site supervisors would also ensure compliance with all of the herbicide protocols and safety measures specified by the VCWPD, as well as all specifications and instructions stipulated by manufacturer labels. Prior to project implementation, the VCWPD would additionally provide the Ventura County Agricultural Commissioner with a written recommendation for herbicide use, and consult with the Ventura County Environmental Health Division. With implementation of these actions, as well as the temporary nature of the herbicide treatments, potential impacts associated with potential hazards due to herbicide use would be less than significant.

Cumulative Impacts. Section B.1 of this Initial Study, as supported by Appendix 2, provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. All of the past, present and reasonably foreseeable projects within the Ojai Valley are, or would be, subject to compliance with all applicable State, federal and local laws, regulations and ordinances regarding hazardous materials; therefore, no significant and unavoidable adverse cumulative impacts related to hazardous materials would be anticipated to occur during the proposed project's implementation. As discussed above, hazardous materials impacts associated with implementation of the proposed project would be less than significant and temporary in nature. Therefore, its incremental contribution to impacts associated with hazardous materials would not be cumulatively considerable. Cumulative impacts would be less than significant

B.18C Hazardous Wastes

Proposed Project Impacts. According to the Ventura County *Initial Study Assessment Guidelines*, "hazardous wastes" include the following (County of Ventura, 2006):

- A waste, or combination of wastes, which because of it's quantity, concentration, physical or chemical characteristics, may cause, or significantly contribute to an increase in mortality or an increase in serious irreversible, or incapacitating reversible illness; or may pose a substantial present or potential hazard to human health or environment when improperly treated, stored, transported, or disposed of, or otherwise managed.
- A waste that meets any of the criteria for the identification of a hazardous waste adopted by the State Department of Toxic Substances Control pursuant to Section 25141, Division 20, Chapter 6.5 of the California Health and Safety code.
- Waste that includes, but is not limited to, Resource Conservation and Recovery Act (RCRA) hazardous waste.
- Waste that, unless expressly provided otherwise, includes extremely hazardous waste and acutely hazardous waste.

The proposed project would generate used motor oil, which is considered a hazardous waste, during proposed giant reed removal and chipping activities. However, the proposed project would be subject to compliance with State regulations governing hazardous waste generation, including those defined by the Department of Toxic Substances Control (DTSC), which require the safe disposal of all hazardous waste. The proposed project would also generate empty containers that had been used to store glyphosate-based herbicides, which may be considered a hazardous waste. However, all manufacturer label instructions, as well as the protocols and contract specifications of the VCWPD, would be followed for the safe disposal of these containers. No other hazardous wastes would be generated due

to implementation of the proposed project. Therefore, impacts associated with hazardous wastes would be less than significant.

Cumulative Impacts. Initial Study Section B.1, as supported by Appendix 2, provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. As described above, the proposed project would have a less than significant impacts in regard to hazardous waste. As with the proposed project, the other past, present and reasonably foreseeable project located within the Ojai Valley would also be required to comply with all applicable State and local laws and regulations regarding hazardous waste, and may be required to implement additional safety measures for the handling and disposal of hazardous waste if warranted by project-specific regulatory reviews and approvals. Therefore, cumulatively significant adverse and unavoidable impacts related to hazardous waste would not be expected. Given the above, the proposed project would not incrementally contribute to impacts associated with hazardous wastes that would be cumulatively considerable. Less than significant cumulative impacts would occur.

B.19 NOISE AND VIBRATION

Noise is defined as any unwanted sound that is undesirable because it either interferes with speech and hearing, is intense enough to damage hearing, or otherwise is annoying (County of Ventura, 2006). Because the effects of noise accumulate over time, it is necessary to address both the intensity and duration of sound. As such, the thresholds of significance for noise take both of these elements into account.

Fundamentals of Environmental Acoustics. A brief background on the fundamentals of environmental acoustics is helpful in understanding how humans perceive various sound levels. Although extremely loud noises can cause temporary or permanent damage, the primary environmental impact of noise is annoyance. The objectionable characteristic of noise often refers to its loudness. Loudness represents the intensity of the sound wave, or the amplitude of the sound wave height measured in decibels (dB). Decibels are calculated on a logarithmic scale; thus, a 10 dB increase represents a 10-fold increase in acoustic energy or intensity, while a 20 dB increase represents a 100-fold increase in intensity. Decibels are the preferred measurement of environmental sound because of the direct relationship between a sound's intensity and the subjective "noisiness" of it. The A-weighted decibel system (dBA) is a convenient sound measurement technique that weights selected frequencies based on how well humans can perceive them. Figure B.19-1 provides typical ranges of common sounds heard in the environment.

The range of human hearing spans from the minimal threshold of hearing (approximately 3 dBA) to that level of noise that is past the threshold of pain (approximately 120 dBA). In general, human sound perception is such that a change in sound level of three (3) dB is just noticeable, while a change of 5 dB is clearly noticeable. A change of 10 dB is perceived as a doubling (or halving) of sound level. Noise levels are generally considered low when they are below 45 dBA, moderate in the 45 to 60 dBA range, and high above 60 dBA. Noise levels greater than 85 dBA can cause temporary or permanent hearing loss if exposure is sustained. Examples of low daytime noise levels are those observed in isolated natural settings (e.g., undeveloped, open space areas) (20 dBA), and quiet suburban residential streets (43 dBA). Examples of moderate level noise environments are urban residential or semi commercial areas (55 dBA) and commercial locations (60 dBA). Although people often accept the higher levels

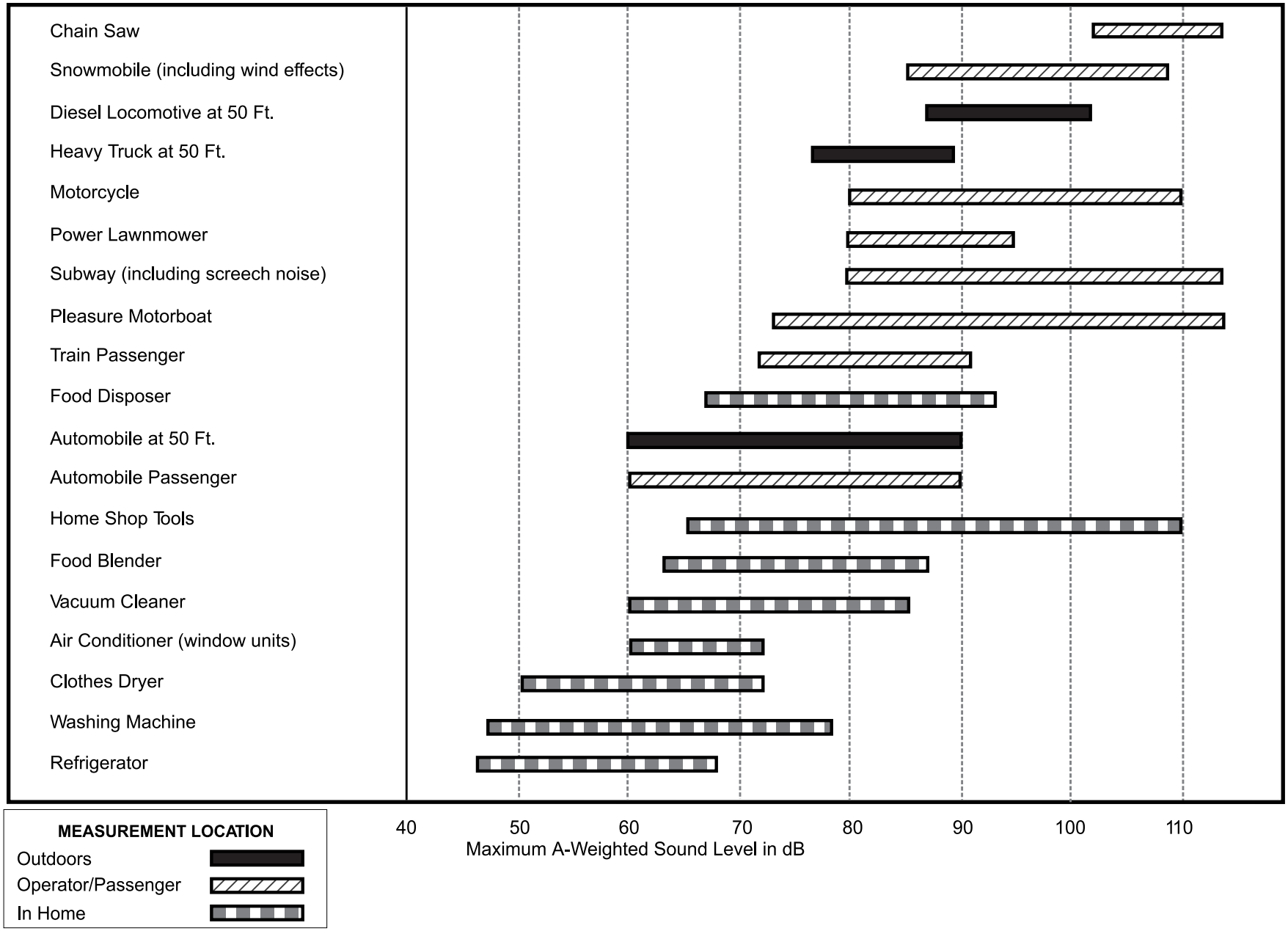
associated with very noisy urban residential and residential-commercial zones (63 dBA), as well as industrial areas (65 to 70 dBA), the levels are nevertheless considered adverse (USEPA, 1971). Example noise sources and individual or community response are shown in Figure B.19-2.

Ambient environmental noise levels can be characterized by several different descriptors. Energy Equivalent or Energy Average Level (Leq) describes the average or mean noise level over a specified period of time. Leq provides a useful measure of the impact of fluctuating noise levels on sensitive receptors over a period of time. Other descriptors of noise incorporate a weighting system that accounts for human's susceptibility to noise irritations at night. Community Noise Equivalent Level (CNEL) is a measure of cumulative noise exposure over a 24-hour period, with a five (5) dB penalty added to evening hours (7:00 p.m. to 10:00 p.m.) and a 10 dB penalty added to night hours (10:00 p.m. to 7:00 a.m.). Day/Night Average Noise Level (Ldn) is essentially the same as CNEL, with the exception that the evening penalty is dropped.

Noise Environment of the Proposed Project Area. The dominant noise sources in the proposed project area are street traffic (including personal vehicles and trucks [pick-up trucks, delivery trucks, semi-trailers]), home construction activities, and agricultural activities.

On August 19, 2008 noise measurements were recorded using an impulse integrating sound level meter (Quest Technologies-Model 2800) at ten locations along upper San Antonio, McNell, Thacher and Reeves Creeks in those areas where non-native vegetation removal activities would occur to quantify existing conditions. Figure B.19-3 provides the locations where sound measurements were taken. Table B.19-1 provides the recorded ambient noise conditions in the proposed project area. As demonstrated in Table B.19-1, the existing average ambient noise levels in the vicinity of proposed project area range between 36.4 and 63.9 dBA Leq.

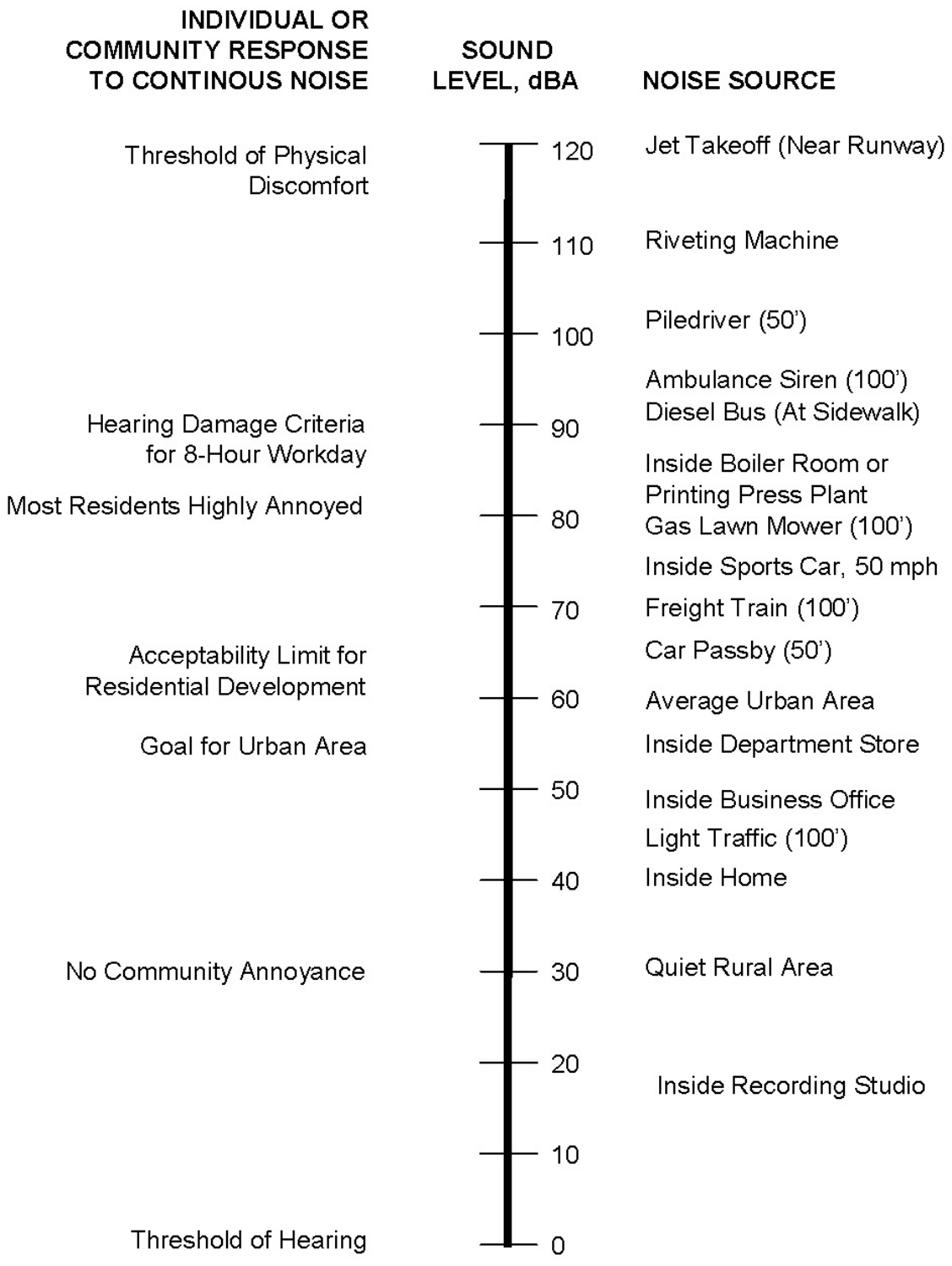
Sensitive Receptors. According to the Ventura County *General Plan*, land uses considered to be noise sensitive include residential dwellings, educational and health facilities, research institutions, and certain recreational and entertainment facilities (typically, indoor theaters and parks for passive activities) and churches (County of Ventura, 2005a). However, it is stated in the *General Plan* (Section 2.16) that construction noise shall be evaluated in accordance with the County's *Construction Noise Threshold Criteria and Control Plan*, which states that noise-sensitive receptors include hospitals, nursing homes (quasi-residential), residential (single-family and multi-family), hotels/motels (quasi-residential), schools, churches, and libraries (when in use) (County of Ventura, 2005b). The distinction between these two sources is that the *General Plan* appears to consider a wider variety of sensitive receptors than is indicated in the County's *Construction Noise Threshold Criteria and Control Plan*. Conservatively, sensitive receptors in the project area would include Soule Park Golf Course, residential homes, San Antonio Elementary School (650 Carne Road), Thacher School (5025 Thacher Road), Ojai Valley School (Upper School Campus) (10820 Reeves Road), Monica Ros School (783 McNell Road), St. Joseph's Health and Retirement Center (2464 East Ojai Avenue), Christ Church (1290 Grand Avenue); Our Lady and All Angels (1502 East Ojai Avenue); and, Meditation Mount (10340 Reeves Road).



Source: *USEPA, 1978. Protective Noise Levels Condensed Version of EPA Levels Document*

Figure B.19-1

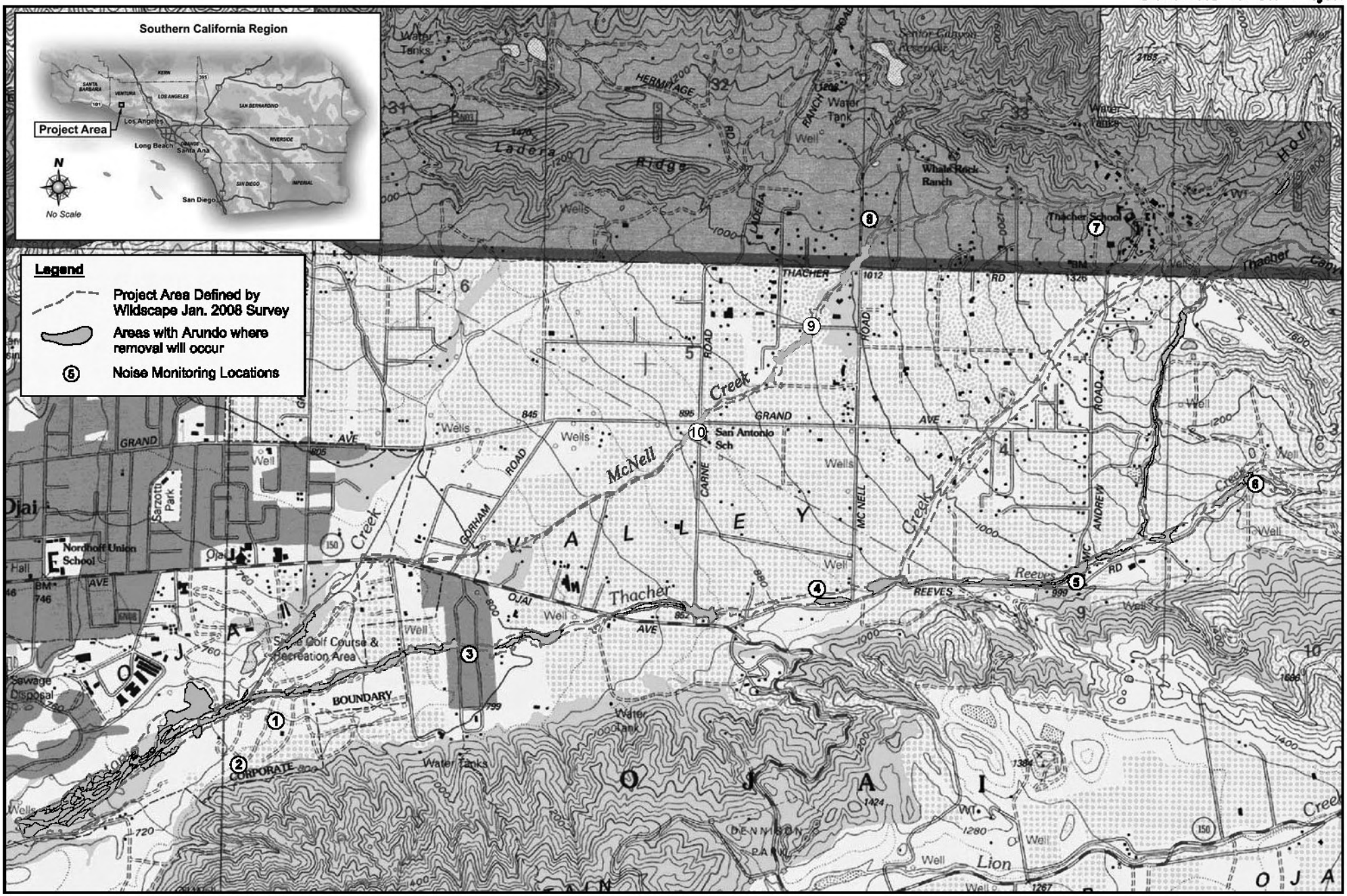
Typical Range of Common Sounds Heard in the Environment



Source: County of Ventura, 2005.

Figure B.19-2

Typical Sound Levels of Noise Sources and Expected Reactions



Prepared by Aspen Environmental Group

1" = 2,200'
Date: August 25, 2009
File: 1085-27-USAC-Noise4.dwg

North

0 1,100 2,200 4,400
Graphical Scale Feet

Figure B.19-3
Ambient Noise Monitoring Locations
(see Table B.19-1)

Table B.19-1 Ambient Noise Levels Representative of the Project Area

Location		Survey Period	L_{eq}	L_{max}	L_{min}	Distance of Sound Level Meter from:		Noted Sources
#	Description					Receptor Location	Project Activity Area	
1	Tennis courts in Soule Park off Soule Park Drive (in the parking lot on east side of the tennis courts)	1:24 to 1:44 p.m.	44.6	60.4	37.2	In the parking lot approximately 10 feet east of the tennis courts	Approximately 0.2 mile (1,056 feet) northeast of the horse ring in Soule Park	Cars, wind (25 to 31miles per hour)
2	Graded area in Soule Park south of horse ring and adjacent to Soule Park Golf Course (south of Golf Course Hole Number 8 and north of Hole Number 13)	1:48 to 2:08 p.m.	43.8	52.9	37.9	At terminus of Soule Park Road, approximately 35 feet north of Hole Number 13, and 290 feet west of the horse ring	Approximately 290 feet west of the horse ring	Wind (25 to 31 mph), birds, distant construction noise
3	Home (384 Avenida del Recreo) located just north of intersection with Camino Del Arroyo (west side of home)	12:56 to 1:16 p.m.	49.4	69.4	39.4	Along west side of property line (384 Avenida del Recreo), approximately 30 feet west of house and 80 feet north of Camino del Arroyo	Approximately 50 feet southwest from proposed activities in Thacher Creek	Car, very upset (e.g., screaming) child inside house
4	Across from home (3622 Reeves Road on south side of Reeves Road) near intersection of McNell Road and Reeves Roads (reading taken on north side of Reeves Road)	12:27 to 12:47 p.m.	55.5	75.4	34.5	Along north shoulder of Reeves Road, approximately 0.2 mile (1,056 feet) west of McNell Road and approximately 30 feet north of property line (3622 Reeves Road) and 200 feet north of house	Approximately 60 feet south of proposed activities in Thacher Creek	Cars, bulldozer
5	Home (4877 Reeves Road on north side of Reeves Road), east of intersection of McAndrew Reeves Roads.	11:55 a.m. to 12:15 p.m.	56.7	75.8	36.8	Along south side of property line (4877 Reeves Road), approximately 120 feet southwest of house and 90 feet east of McAndrew Road	Approximately 80 feet south of proposed activities along Reeves Creek	Cars and delivery truck
6	Intersection of Reeves Road and Topa Topa Ranch Road, outside of private drive for 5775/ 5776 Reeves Road	11:27 to 11:47 a.m.	56.1	79.2	35.7	Approximately 320 feet northeast of property line of large home surrounded by orchards. Approximately 220 feet southwest of home at 5775/ 5776 Reeves Road	Approximately 160 feet east of the terminus of the project area along Reeves Creek	Truck across wooden bridge, delivery truck, leaf blowers
7	Thacher School – 5025 Thacher Road (reading taken on road east of running track and tennis courts)	10:50 to 11:10 a.m.	46.3	63.0	40.2	Approximately 75 feet east of running track, and 600 feet southwest of classroom buildings	Approximately 0.25 mile (1,320 feet) east of construction area	Building ventilation system, cars

Location		Survey Period	L_{eq}	L_{max}	L_{min}	Distance of Sound Level Meter from:		Noted Sources
#	Description					Receptor Location	Project Activity Area	
8	Home (1674 Chaparral Road) at intersection of McNell Road and Chaparral Road (Reading taken on northeast side of intersection; home located on southeast side of intersection)	10:22 to 10:42 a.m.	42.4	54.8	34.2	Approximately 30 feet north of property line (1674 Chaparral Road), and 65 feet northwest of house	Approximately 100 feet west of proposed activities along McNell Creek	House construction (saw, hammer), car
9	Home (3508 Calle Moreno) located between Shippee Lane and McNell Road	9:39 to 9:59 a.m.	36.4	52.9	33.4	Along north side of property line (3508 Calle Moreno), approximately 150 feet north of house	Approximately 200 feet west of proposed activities along McNell Creek	Birds, sprinkler for citrus orchard
10	San Antonio School (650 Carne Road) at intersection of Carne Road and Grand Ave.	9:05 to 9:25 a.m.	63.9	86.3	37.9	At northwest corner of property line (San Antonio School), approximately 55 feet northwest of tennis courts and 200 feet northwest of classroom building.	Approximately 50 feet south of proposed activities along McNell Creek.	Trucks, semi-trailer, bull dozer (passing by)

Notes: All measurements are in dBA and were taken on August 19, 2008. According to the County of Ventura *Construction Noise Threshold Criteria and Control Plan* (November 2005), Appendix 3, ambient noise measurements were conducted for 20 minutes at representative locations.

Table B.19-2 Daytime Construction Activity Noise Threshold Criteria

Construction Duration Affecting Noise-Sensitive Receptors	Noise Threshold Criteria[1]	
	Fixed L_{eq}(h), dBA	Hourly Equivalent Noise Level (L_{eq}), dBA[2, 3]
0 to 3 days	75	Ambient L_{eq}(h) + 3 dB
4 to 7 days	70	Ambient L_{eq}(h) + 3 dB
1 to 2 weeks	65	Ambient L_{eq}(h) + 3 dB
2 to 8 weeks	60	Ambient L_{eq}(h) + 3 dB
Longer than 8 weeks	55	Ambient L_{eq}(h) + 3 dB

Source: County of Ventura, 2005b.
Notes: (1) The Noise Threshold Criteria shall be the greater of these noise levels at the nearest receptor area or 10 feet from the nearest noise-sensitive building
(2) The instantaneous Lmax shall not exceed the Noise Threshold Criteria by 20 dBA more than 8 times per daytime hour.
(3) Local ambient Leq measurements shall be made on any mid-week day prior to project work.

Proposed Project Impacts. The proposed project involves the removal of non-native plant species; it does not involve any type of development. As such, the thresholds of significance identified in the Ventura County *General Plan* would not apply. However, the County's *Construction Noise Threshold Criteria and Control Plan* would apply and it establishes the thresholds of significance criteria provided in Table B.19-2, below, for construction during daytime hours. According to the County's *Construction Noise Threshold Criteria and Control Plan*, "daytime hours" (7:00 a.m. to 7:00 p.m., Monday through Friday, and 9:00 a.m. to 7:00 p.m., Saturday, Sunday and local holidays) generally means any time

period that is not specifically defined as a more noise-sensitive time period; depending on a project's duration.

In addition to the above, the City of Ojai's *General Plan* was also reviewed and no noise policies applicable to the proposed project were identified.

As described in the Section A.7 (Project Description), activities associated with the proposed project would involve the use of hand held equipment such as chain saws, loppers and power brush cutters to cut dead plant material. The plant material would be removed either by hand or with small equipment and transported to a chipping site in Soule Park. Initial giant reed removal activities would take an estimated eight weeks, or 35 to 40 working days, to complete with two crews of approximately five workers each. On average, it is estimated that the initial site-specific treatment activities would range between several hours to several working days at any given location in the proposed project area. Therefore, the most appropriate threshold of significance criteria provided in Table B.19-2 that would apply would be a construction duration of zero to three days at a single location, with a maximum Leq of 75 dBA, or an increase of three (3) dB over the ambient noise condition, whichever is greater.

For the purposes of this analysis, it has been assumed that at the targeted creek reaches up to two power pieces of equipment (chain saws and/or power brush cutters) and two hand-held loppers would be in use 100 percent of the time in any given hour (60 minutes) per work crew. This assumes that the two crews would work one or two parcels apart from each other and would rarely be closer to each other than 500 feet (VCWPD, 2008). As shown in the noise modeling provided in Appendix 4, removal activities would thus result in an unmitigated noise level of approximately 91 dBA at 50 feet from any creek reach targeted for giant reed and castor bean removal. Although these modeled noise levels are highly conservative in that they do not account for noise reduction factors such as absorption by soft surfaces, or obstructions that may block the line of sight between the construction equipment and any noise receptors, the estimated construction noise levels would exceed the County's significance criteria of 75 dBA Leq at the nearest receptor location or ten (10) feet from the nearest noise-sensitive building, thus resulting in a potentially significant impact.

At Soule Park, one or two chippers would be operated Monday through Friday between the hours of 12:00 p.m. and 6:00 p.m. The chippers would be operated only after enough plant material has been accumulated to warrant their efficient use. In total, it is estimated that over the eight week removal period the chippers would operate approximately every seven to ten working days. Therefore, the most appropriate threshold of significance criteria listed in Table B.19-2 that would apply to chipping activities would be based on a construction duration of two to eight weeks with a maximum Leq of 60 dBA, or an increase of three (3) dB over the ambient noise condition, whichever is greater.

As a worst-case scenario, it has been assumed that at the chipping area two chippers would be operating 100 percent of the time in a given hour (60 minutes). As shown in the noise modeling provided in Appendix 4, the chipping activities would result in an unmitigated noise level of approximately 93 dBA at 50 feet from the chipping area in Soule Park. Similar to the proposed removal activities, the estimated construction noise levels for chipping would exceed the County's threshold of significance criteria of 60 dBA Leq at the nearest receptor area, thereby resulting in a potentially significant impact.

In addition to the noise generated by giant reed and castor bean removal and chipping activities, haul trucks would also generate noise as they traverse the streets between the targeted creek reaches for non-native vegetation removal and Soule Park to transport equipment, cut plant material and project workers. As shown in Figure B.19-1, a heavy truck can generate noise at levels of up to 88 dBA at 50 feet (USEPA, 1978). As such, the noise level increases from truck traffic would, for brief periods (e.g., as a truck passes a given location), exceed the Ventura County daytime construction noise threshold criteria of 75 dBA; however, it is not expected that the increase in truck traffic resulting from the proposed project would increase the overall ambient noise levels during any given hour by more than 3 dB. None-the-less, per the County's *Construction Noise Threshold Criteria and Control Plan*, the maximum instantaneous noise level (Lmax) at any given location should not exceed the Noise Threshold Criteria (NTC) by 20 dBA more than eight times within any daytime hour. Implementation of Mitigation Measure N-9, below, in conjunction with Mitigation Measure T-1, as provided in Section B.22 (Traffic/Circulation), would ensure that noise impacts to sensitive receptors generated from the haul trucks would be reduced to a level of less than significant.

Implementation of Mitigation Measures N-1 through N-9, below, in conjunction with Mitigation Measure AQ-1 (as provided in Initial Study Section B.3 [Air Quality]) would reduce project-related noise associated with the plant removal activities along upper San Antonio, McNell, Thacher, and Reeves Creeks, chipping activities at Soule Park, and the transportation of cut plant materials to Soule Park to a level of less than significant.

MM N-1 All equipment shall include noise reduction measures, as applicable. These measures shall include, but may not be limited to, properly operating and maintaining mufflers, correct placement of equipment engine covers, and ensuring that small loading equipment is equipped with rubber tires.

MM N-2 All machinery shall be equipped with the best available exhaust mufflers and "hush kits," as applicable.

MM N-3 Chain saws and power brush cutters shall be maintained with sharp, damped blades with random tooth spacing. Plant material shall be tightly clamped, as feasible, during cutting operations.

MM N-4 To the extent feasible, noise levels shall be kept relatively uniform. Excessive and impulse noises shall be avoided.

MM N-5 Noise producing signals, including horns, whistles, alarms, and bells shall be limited to safety warning purposes only.

MM N-6 As part of the project's advanced notification to all residences and property owners, a contact person name and phone number shall be provided. The contact person shall respond to questions or concerns related to noise and vibration within 24 hours. If warranted by inquiries or complaints, on-site noise measurements shall be taken to determine if noise or vibration levels are substantially greater than expected levels. If plant removal activities are delayed by more than two weeks, an additional notice with a revised project implementation schedule shall be mailed to adjacent property owners.

MM N-7 Plant removal work crews shall be located a minimum of 400 feet apart from each other to limit their combined noise effect.

MM N-8 Project-related activities at Soule Park shall not exceed average hourly noise levels greater than 60 dBA. Chipping equipment shall be selected per manufacturer's specifications that ensure average hourly noise levels of 60 dBA or less, as measured from the nearest designated recreational area within the park, or a solid noise control barrier shall be erected around the chipping equipment. The noise control barrier shall be made of a solid, weather-protected, sound-absorptive material and erected according to applicable codes. Maintenance and repair of the noise control barrier shall include, but not be limited to, keeping its sides clean and free from graffiti, and promptly repairing gaps, holes, and other weaknesses. The noise control barrier shall be completely removed and the chipping area properly restored upon completion of all chipping-related activities.

MM N-9 To the extent feasible, haul trucks shall use major roadways and avoid residential side streets. Haul trucks shall not travel on streets within 250 feet of any school building during school hours, or within 250 feet of any hospitals and nursing homes at any time. In the event that project-related activities cannot meet these stipulations, a variance from Ventura County shall be obtained.

Cumulative Impacts. Section B.1 of this Initial Study, as supported by Appendix 2, provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. Combined, these projects could potentially result in noise and vibration impacts that are cumulatively considerable. However, noise-related impacts associated with the proposed project would be temporary in nature (approximately 35 to 40 working days), and, with implementation of Mitigation Measures N-1 through N-9, these impacts would be less than significant. Additionally, the other past, present or reasonably foreseeable projects that are located within the jurisdiction of the County of Ventura would also be required to mitigate, to the extent feasible, any noise-related impacts to a level of less than significant per the County's *Construction Noise Threshold Criteria and Control Plan*. Therefore, the proposed project would not incrementally contribute to noise and vibration impacts in a manner that would be cumulatively considerable. Cumulative impacts would be less than significant.

B.20 GLARE

Proposed Project Impacts. According to the Ventura County *Initial Study Assessment Guidelines* in order for a project to have impacts related to glare, it must generate light that would directly illuminate or reflect upon adjacent properties, or be directly seen by motorists or persons residing, working or otherwise located within its sight (County of Ventura, 2006). The proposed project does not include the installation of any nighttime lighting that could generate illumination. The proposed project would include the removal of giant reed and castor bean and the transport of cut vegetation to Soule Park for chipping. The equipment used for project-related vegetation cutting and foliar spraying would be within creek reaches that are partially or fully covered with vegetation, and thus would not be anticipated to generate a substantial amount of glare from sunlight. The proposed chipping area would be within an area of Soule Park that is not accessible to the public; therefore, any small amounts of glare generated

by the chippers would not generate an appreciable amount of glare that is visible from adjacent properties, motorists or persons. Less than significant glare impacts would occur.

Cumulative Impacts. Section B.1 of this Initial Study, as supported by Appendix 2, provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. Construction and operation of the projects in the proposed project area could include equipment, building façade materials, vehicle trips and parking that would create glare. Therefore, future development within the Ojai Valley area could result in cumulative glare impacts to residents and motorists. However, as discussed above, glare impacts associated with implementation of the proposed project would be temporary in nature (35 to 40 working days) and less than significant. Therefore, its incremental contribution to glare impacts would not be cumulatively considerable. Cumulative impacts would be less than significant.

B.21 PUBLIC HEALTH

Public health issues include a variety of human health-related concerns such as, but not limited to, vectors, bioaerosols and other pathogens, and other environmental factors that pose a substantial existing or potential hazard to public health (County of Ventura, 2006).

Proposed Project Impacts. Under the proposed project, removal activities would occur along McNell, Thacher and Reeves Creeks, and a segment of upper San Antonio Creek located within and north of Soule Park and Soule Park Golf Course. The proposed project would affect two groups of the general public: the workers undertaking project-related activities; and, users of the project area. Work crews would be involved in cutting giant reed and castor bean and hauling the biomass to the Soule Park chipping area and/or applying a glyphosate-based herbicide to the giant reed and castor bean. The proposed project would occur adjacent to a variety of rural and semi-rural uses. Members of the public that potentially could be within the proposed project area would include the following:

- Residents and agricultural workers living or working adjacent to McNell, Thacher and Reeves Creeks;
- Students, teachers and administrators at San Antonio Elementary School, Thacher School, Monica Ros School and Ojai Valley Upper School;
- Soule Park and Soule Park Golf Course users;
- Plant collectors; and,
- Other persons exploring the subject creeks.

Workers would be exposed to glyphosate by inhalation and skin contact during spraying, mixing, cleanup and vegetation removal. Both workers and the public would be exposed to glyphosate by touching the soil and plants to which glyphosate was applied (USEPA, 2006a).

As noted in Initial Study Section A.9 (Other Agencies Whose Approval May Be Required), prior to project implementation the VCWPD would consult with the Ventura County Environmental Health Division to establish if any type of permit or approval is required, and address any questions or concerns regarding proposed herbicide use. Additionally, as described in Initial Study Section A.7 (Project Description) and Section B.18A (Above-Ground Hazardous Materials), herbicide applications would be completed or supervised on site by personnel holding either a Qualified Applicator License or a Qualified Applicator Certificate from the California Department of Pesticide Regulation. A Pest Control Advisor would prepare a written recommendation for herbicide use for the VCWPD, and

would submit it to the Ventura County Agricultural Commissioner for review and approval prior to the start of work. While the proposed herbicides are not restricted materials, all work conducted for the VCWPD must have a Pest Control Advisor written recommendation. On-site supervisors would additionally ensure that specific safety measures and manufacturer label specifications are followed, and that the VCWPD's protocols to avoid herbicide drift into adjacent areas and product label requirements are implemented. The VCWPD protocols and contractor specifications during foliar spray treatments would prohibit this application method within:

- 25 feet of surface water;
- 25 feet of any road;
- 200 feet of structures; or,
- 50 feet of an orchard or agricultural field.

Active work areas near public roads or intersections would be clearly posted with signs that would discourage plant gathering or other uses. Prior to any site-specific activities, work crews would also survey the general area to ensure that no people are present. The VCWPD would also notify all property owners of removal activities by mail at least two weeks prior to work, and secure all necessary property access agreements. As described in the *Plans and Specifications for the Matilija Dam Ecosystem Restoration Project Giant Reed Removal Project*, project-related signs would discourage use of the area for a minimum of two weeks after herbicide applications.

Implementation of the proposed project would involve the use of a glyphosate-based herbicide (Aquamaster®) for both "cut and daub" and foliar spray treatments of giant reed and castor bean. Glyphosate is a broad-spectrum, non-selective, post-emergent herbicide that is in relatively wide use within the United States for vegetation control. Aquamaster® is approved and labeled for use near and in open water.

The USEPA has determined glyphosate to have a reference dose (RfD) of 2 milligrams per kilogram per day (mg/kg/day), meaning that a person could receive a dose of 2 mg/kg/day throughout ever day of his or her life without an adverse health effect. Short-term or acute exposures above the chronic RfD can occur without any known adverse health effect. The estimated lethal dose of glyphosate in humans is 445 mg/kg/day (United States Forest Service, 2002). Consequently, a 150-pound (73-kg) person would need to be exposed to 32,485 mg of glyphosate in a single day to achieve a lethal dose.

Toxicological tests show that while glyphosate is highly toxic to plants, it is largely non-toxic to animals. Glyphosate is largely undigestible to mammals and is excreted essentially in an unmetabolized form. This is reflected in the large amount of glyphosate needed to cause acute toxicity. The USEPA has determined that glyphosate is non-carcinogenic to humans based on a large body of data. Additional testing has found no evidence that glyphosate is a direct neurotoxin, nor is there evidence of neurological effects among workers who mix and spray Roundup® (a glyphosate-based herbicide). Other tests have concluded that glyphosate is not an endocrine disruptor (Monheit, 2002).

For the purposes of its vegetation control activities, the United States Forest Service (Forest Service) prepared a risk assessment in 1996 that included an evaluation of the use of these types of herbicides. A summary of the findings of this risk assessment is provided below. The summary is based upon

information presented in the Forest Service's *Environmental Assessment of Eradication of Arundo in Big Tujunga Canyon, California* (United States Forest Service, 2002). The Forest Service's risk assessment was primarily focused on Rodeo®. It is noted, however, that Aquamaster® and Rodeo® have the same formulations (53.8 percent by weight isopropylamine salt of glyphosate and 46.2 percent by weight water); therefore, the risks associated with the use of either of these two herbicides are considered to be the same (Dow, 2003; Monsanto, 2003).

The Forest Service evaluated two types of risk exposure scenarios: (1) job-specific; and, (2) incident-specific. The job-specific scenarios estimated absorption associated with various work-related activities under which multiple routes of exposure could occur, such as mixing, loading, and applying the herbicide. Incident-specific scenarios refer to scenarios such as spills on the skin or wearing contaminated clothing. The major hazard associated with glyphosate involves contact with the skin or eyes, as irritation is likely to result from contact.

The maximum allowable rate of application for Aquamaster® is 7.5 pounds of active ingredient per acre, or 5.6 quarts per acre. Assuming a worst-case scenario of 7.5 pounds of active ingredient per acre, ground-based applicators would generally be expected to be exposed to a daily dose of 0.006 mg/kg. For those ground workers applying these herbicides by boom spray, the daily dose of exposure would be expected to be approximately 0.013 mg/kg. The level of daily exposure is anticipated to diminish sharply after the initial application, as progressively less vegetation would need to be treated as the project continues through 2012. Table B.21-1, below, provides a summary of the risks to work crews due to incidental exposures.

Table B.21-1 Work Crews Risks Associated with Incidental Glyphosate Exposure

Activity	Assumption	Dose (mg/kg)	Hazard Quotient*
Immersion of hands	One minute	0.00012	0.00006
Wearing contaminated gloves	One hour	0.0069	0.0003
Accidental spill on leg	Effective washing after 1 hour	0.007 – 0.019	0.004 – 0.01

* A hazard quotient is the ratio of the estimated level of exposure to a daily dose level that is not anticipated to cause and adverse effect on a human population over a lifetime of exposure. The daily dose level for glyphosate is 2 mg/kg/day. Hazard quotient values less than 1 imply an acceptable margin of safety.

Source: United States Forest Service, 2002.

Members of the general public are typically exposed to very low levels of glyphosate. Glyphosate is a non-selective herbicide that readily and completely biodegrades in soil, and has little potential for leaching into groundwater (USEPA, 2006a). The half-life of glyphosate can range between three to 130 days, depending on site-specific soil structure, moisture, and temperature. Its half-life in water is estimated to range from a few to 63 days, depending on site-specific conditions (USEPA, 2006b; United States Forest Service, 2002). Based on its water solubility, glyphosate does not substantially bioconcentrate in aquatic organisms and is minimally retained and rapidly eliminated by fish, birds, and mammals (USEPA, 2006a). Table B.21-2 presents a summary of several types of exposure risks to the general public.

Under the proposed project, targeted creek reaches would be sprayed and/or daubed with Aquamaster®. Assuming a worst-case scenario of applying 7.5 pounds (or 5.6 quarts) of active ingredient over the site, which is the maximum allowable application volume, and evaluating the public risks associated with exposure to glyphosate, the maximum hazard quotient associated with glyphosate exposure would

be associated with the consumption of vegetation (i.e., a hazard quotient of 0.06). While this hazard quotient is substantially below the threshold of 1.0, repeated or extended exposures could potentially result in acute health effects such as congestion of the lungs and increased breathing rate (USEPA, 2006a).

Table B.21-2 Public Risks Associated With Glyphosate Exposure

Activity	Assumption	Dose (mg/kg)	Hazard Quotient*
Direct spray	Naked child: exposure to entire body with washing after one hour	0.031 – 0.061	0.002 – 0.03
	Young woman: exposure to feet and legs with washing after one hour	0.0026 – 0.0053	0.001 – 0.003
Walking through a contaminated area	Skin absorption	0.005 – 0.0009	0.000005 – 0.0005
Drinking contaminated water	22 pound (10 kilogram) child consuming 1.06 quarts (1 liter) immediately after spraying	0.0093	0.005
Consumption of fish	Shortly after spraying	0.002	0.001
	Over prolonged periods	0.00009	0.00005
Consumption of vegetation	Berries shortly after spraying	0.032	0.003
	Berries up to 20 days after spraying	0.006	0.06

* A hazard quotient is the ratio of the estimated level of exposure to a daily dose level that is not anticipated to cause and adverse effect on a human population over a lifetime of exposure. The daily dose level for glyphosate is 2 mg/kg/day. Hazard quotient values less than 1 imply an acceptable margin of safety.
Source: United States Forest Service, 2002.

As described above in Section A.7 (Project Description), a variety of protocols would be taken to reduce the exposure of the public to glyphosate, most notably restrictions on foliar spraying, notification of property owners, and posting of signs discouraging the public's use of affected areas. All other specifications and requirements of the *Plans and Specifications for the Matilija Dam Ecosystem Restoration Project Giant Reed Removal Project* would be implemented as well. The total acreage requiring herbicide re-applications is anticipated to decline sharply after the initial application; thus, potential impacts associated with herbicide exposures would also sharply decline over the duration of the proposed project (estimated to end in 2012). With full implementation of the protocols, specifications and requirements outlined above, and Mitigation Measure N-6 (as provided in Initial Study Section B.19 [Noise and Vibration]), which provides for a point of contact for all project-related questions and concerns, public health impacts associated with the proposed project would be less than significant.

The proposed project additionally involves the cutting and removal of giant reed and castor bean. The cut stumps could potentially present a physical hazard (tripping and falling) to persons accessing those creek reaches targeted for vegetation removal; however, this risk is considered to be similar to existing risks within the proposed project area. Impacts would thus be considered less than significant. Chipping activities could also present a potential hazard to persons due to injuries caused by "fly away" chips exiting the chipper. However, all work crews would be required to use standard safety equipment (such as goggles and gloves) and clothing to minimize injury, and the public would not be allowed access to the chipping area during active chipping activities. Therefore, health and safety risk impacts due to chipping would be less than significant.

Cumulative Impacts. Section B.1 of this Initial Study, as supported by Appendix 2, provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. Although these projects may involve the use or transport of materials that could pose a threat to public health, or involve other activities which could place public health at risk, these projects would be required to mitigate for such impacts in a manner similar to the protocols, specifications and requirements of the proposed project. Consequently, significant cumulative public health impacts within the proposed project area would not be anticipated to occur. As addressed above, public health impacts associated with implementation of the proposed project would be less than significant; therefore, its incremental contribution to public health impacts would not be cumulatively considerable. Less than significant cumulative impacts would occur.

B.22 TRANSPORTATION/CIRCULATION

B.22A(1) Public Roads and Highways - Level of Service

Proposed Project Impacts. There is no operational component to the proposed project; therefore, for the purposes of this analysis, the proposed project has been evaluated within the context of generating traffic-related impacts during: (1) initial giant reed and castor bean removal and herbicide treatments ("initial phase"); and (2) herbicide retreatment activities ("re-treatment phase").

Initial Phase. Traffic associated with the proposed project's initial phase would consist of trucks needed to transport equipment and materials to and from the creek reaches targeted for giant reed and castor bean removal, the haul or dump trucks needed to transport cut plant material to Soule Park, trucks needed for moving chipped plant material stockpiles, and project-related worker vehicles. Major roadways surrounding the proposed project area that would likely be traveled during the project's initial phase include:

- North Ventura Avenue;
- Grand Avenue;
- Ojai Avenue;
- Thacher Road;
- Reeves Road;
- Gorham Road;
- Boardman Road; and,
- Soule Park Drive.

Table B.22-1 shows the 2007 daily traffic volumes, including morning and afternoon peak hour trips for those roadway segments that would most likely be used by project-related vehicles. With the exception of State Route 33 (Ventura Avenue), the Level of Service (LOS) designation associated with the roadway segments outlined in Table B.22-1 were not available at the time that this Initial Study was prepared (County of Ventura, 2008a). Some segments of State Route 33 between the end of its freeway status (from a point located south of the community of Casitas Springs and across from [east of] Foster Park) and the City of Ojai are operating at LOS F (County of Ventura, 2008b). A LOS F designation is considered unacceptable for State Route 33 according to Ventura County's *General Plan* (County of Ventura, 2008b). Due to this LOS designation, no peak-hour vehicle trips may be added to State Route

33 in a southbound direction during peak morning hours (6:30 a.m. to 9:00 a.m.) or northbound during peak afternoon and evening hours (3:30 p.m. to 6:30 p.m.) (County of Ventura, 2008b).

Table B.22-1 Major Roadway 2007 Traffic Volumes

Roadway Segment	2007 Total Trips Per Day	2007 A.M. Peak Hour Trips	2007 P.M. Peak Hour Trips
Ventura Avenue:			
- North of Cañada Larga Road	1,200	90	130
- North of Shell Road	7,100	540	690
Grand Avenue:			
- East of Fordyce Road	2,100	230	200
Ojai Avenue	N/A	N/A	N/A
Thacher Road	N/A	N/A	N/A
Reeves Road	N/A	N/A	N/A
Gorman Road	N/A	N/A	N/A
Boardman Road	N/A	N/A	N/A
Soule Park Drive	N/A	N/A	N/A

Source: County of Ventura, 2007.
NA: Data not available.

As identified in Section A.7 (Project Description), initial giant reed removal activities would take an estimated eight weeks, or 35 to 40 working days, to complete. Giant reed removal would require two crews of approximately five workers each and approximately five to seven truck trips per day from those creek reaches targeted for non-native vegetation removal to the chipping area located in Soule Park. Under a "worst-case" scenario of ten workers for the entire eight week period, the maximum daily vehicle trips generated by the proposed project would be approximately 30 (ten worker round trips [20 individual trips, with ten occurring during morning peak hours and ten occurring during evening peak hours], seven daily haul truck trips occurring throughout the day, and three miscellaneous trips occurring throughout the day). Of these 30 trips, no more than 12 vehicle trips typically would occur during either the peak morning or evening hours. Additionally, project-related vehicle trips on most of the roads outlined in Table B.22-1 would be sporadic and would not occur everyday for the entire eight-week period, except along Boardman Road, Soule Park Drive and Ojai Avenue. Table B.22-2 provides the percent addition that the proposed project would add during its initial eight-week phase for those roads having available traffic volume data.

Table B.22-2 Project-Related Traffic Volume Increases – Initial Phase

Roadway Segment	Percent Increase Total Trips Per Day	Percent Increase A.M. Peak Hour Trips	Percent Increase P.M. Peak Hour Trips
Ventura Avenue:			
- North of Cañada Larga Road	2.5%	13%	9.2%
- North of Shell Road	0.4%	2.2%	1.7%
Grand Avenue:			
- East of Fordyce Road	1.4%	5.2%	6%

[1] Assumes a maximum of 30 vehicle trips per day with up to 12 occurring in the peak morning and evening hours

Although the proposed project would temporarily increase vehicle trips along Ventura Avenue, the majority (worker vehicles commuting to and from the project area) are expected to occur in a north-bound direction in the morning peak hour traffic and in a south-bound direction in the afternoon and evening peak hour traffic; consequently, these vehicle trips would primarily be in the opposite direction

of any segments of Ventura Avenue that are currently operating at LOS F. Additionally, project-related commuter trips and any other project-related trips would occur only for an estimated 35 to 40 working days. While existing traffic volume data is not available for the smaller roadways that likely would be used during the proposed project's initial phase, other than commuting trips, the total number of daily vehicle trips would be distributed throughout the entire work day and would also be temporary in nature. Implementation of Mitigation Measure T-1 would minimize potential adverse impacts to the roadways affected by the proposed project's initial phase to a level of less than significant.

MM T-1 Consult with the County of Ventura Public Works Agency, Transportation Department, and the City of Ojai, Public Works Department, Transportation Division at least 30 days prior to project implementation. Consultations shall include identification of: all potential haul routes; proposed traffic safety measures such as warning signs, lights, flashing arrow boards, barricades and cones; lane closures that may be necessary; potential project-related parking, bicycle or pedestrian restrictions; and, any measures to alleviate potential access to and/or parking restrictions within Soule Park. Any traffic control measures that the Ventura County Transportation Department or City of Ojai Transportation Division recommend shall subsequently be implemented.

Re-treatment Phase. Following the proposed project's initial phase, herbicide re-treatments would be undertaken in those creek reaches where giant reed re-emerges. Depending on site-specific conditions, the re-treatments could occur up to four times annually. The type of herbicide application used for the initial treatments would typically be used for re-treatments. As addressed in Section A.7 (Project Description), the workforce needed for each re-treatment would be anticipated to require a maximum of three crews of two to four workers each, and each re-treatment would take up to ten working days to complete. However, the need for re-treatments, and the time and associated number of work crews needed to complete them, would be anticipated to diminish as native vegetation re-establishes in the targeted removal areas. For the purposes of this analysis it is assumed that all re-treatment workers would meet at a prescribed location, such as Soule Park, and that crews would then caravan in a single vehicle to their respective re-treatment areas. Under a "worst case" scenario of three crews of four workers each, 12 worker round-trips (24 individual trips) and three trucks travelling within the proposed project area would occur on any given day, resulting in a maximum of up to 27 trips per day. On a daily basis, 12 trips would occur in the morning, 12 would occur in the afternoon, and three vehicles would travel within the proposed project area throughout the workday. As with the proposed project's initial phase, it is expected that the vehicle trips associated with workers commuting to and from the project area would be in the opposite direction of existing traffic flows for commuting vehicles along Ventura Avenue (e.g., workers would commute north-bound in the morning and south-bound in the afternoon and evening). Additionally, at no time would lane closures or other constraints to local traffic flows be necessary. Due to the limited number of trips generated on a daily basis, in conjunction with the limited and diminishing time-frame needed for re-treatment activities, potential impacts to the local roadway system would be less than significant.

Cumulative Impacts. Section B.1 of this Initial Study, as supported by Appendix 2, provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. As discussed above, implementation of the proposed project's initial phase would be temporary in nature (approximately eight weeks) and herbicide re-treatments would occur four times or less per year and last a maximum of ten days per retreatment through 2012. Therefore, the proposed project

would not incrementally contribute to any permanent cumulative impacts associated with public road and highway LOSs. However, to ensure that the proposed project would have less than significant impacts during its initial phase, Mitigation Measure T-1 would be implemented. With implementation of Mitigation Measure T-1, the proposed project's incremental contribution to short-term cumulative impacts to road and highway LOSs would be less than significant.

B.22A(2) Public Roads and Highways - Safety and Design

Proposed Project Impacts. According to the Ventura County *Initial Study Assessment Guidelines*, "most development projects affect the public road system through access encroachments, improving or widening existing roads, and/or constructing new road sections" (County of Ventura, 2006). Projects that comply with the County's road standards are generally considered to have less than significant impacts on the safety and design of the public road system; projects that impact intersections in a manner that exceeds the State's accident guidelines for signalization are considered significant (County of Ventura, 2006).

The proposed project is specific to non-native vegetation removal and does not involve any development. It would not require access encroachments, the improvement or widening of any existing roads, or the construction of new roads. As addressed in Section B.22A(1), above, the proposed project would result in temporary increases in traffic volumes along North Ventura Avenue, Grand Avenue, Ojai Avenue, Thacher Road, Reeves Road, Gorham Road, Boardman Road and Soule Park Drive. However, Mitigation Measure T-1 would require the VCWPD to consult with the Ventura County Transportation Department and City of Ojai Transportation Division prior to project implementation to ensure that all project-related effects on public roads and highways are minimized. Re-treatment activities would temporarily increase traffic volumes along the project area's existing roadway system; however, no project-related activities during this phase would require lane closures or any other constraints to local traffic flows. Additionally, the duration and intensity of the re-treatments would be anticipated to diminish over time, as native vegetation establishes in the subject creek reaches. Due to the short-term nature of re-treatment activities, and with implementation of Mitigation Measure T-1, public road safety impacts would be less than significant.

Cumulative Impacts. Section B.1 of this Initial Study, as supported by Appendix 2, provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. Combined, these projects could potentially result in public road and highway safety and design impacts that are cumulatively considerable. However, traffic-related impacts associated with the proposed project would be temporary in nature and can be fully mitigated to a level of less than significant with implementation of Mitigation Measure T-1. Therefore, the proposed project would not incrementally contribute to public road and highway safety and design impacts in a manner that would be cumulatively considerable. Cumulative impacts would be less than significant.

B.22A(3) Public and Private Roads - Tactical Access

Proposed Project Impacts. According to the Ventura County *Initial Study Assessment Guidelines*, a development project could result in adverse and significant tactical access impacts if it has only a single point of access (e.g., a public or private road), and the access is greater than 800 feet in length (County of Ventura, 2006). As addressed above in Section B.22A(2), the proposed project does not

involve any type of development. Therefore, tactical access for the proposed project itself is not applicable. However, the proposed project would temporarily increase traffic volumes on the surrounding roadway network, and may require temporary lane closures when cut giant reed and castor bean is loaded into trucks for transport to Soule Park. These activities could temporarily conflict with tactical access to those structures and land uses that are adjacent to the creek reaches targeted for non-native vegetation removal. Such conflicts would only be anticipated during the proposed project's initial phase, as herbicide re-treatments would not require any lane closures or other traffic-related roadway constraints. Implementation of Mitigation Measure T-2 would ensure that tactical access within the proposed project area would not be impeded during the proposed project's initial phase.

MM T-2 Coordinate with the County of Ventura and City of Ojai emergency service providers (police and fire departments and ambulance/paramedic providers) at least 30 days prior to project implementation to communicate information regarding the timing of, and activities that may involve, lane closures, driveway blockages, detours, or other roadway effects that could impede tactical access. Implement any recommendations provided by affected emergency response service providers to maintain essential emergency access routes.

With implementation of Mitigation Measure T-2, project-related impacts associated with tactical access would be less than significant.

Cumulative Impacts. Initial Study Section B.1, as supported by Appendix 2, provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. Combined, these projects could potentially result in tactical access impacts that are cumulatively considerable. However, the tactical access impacts associated with the proposed project would be temporary in nature and can be fully mitigated to a level of less than significant with implementation of Mitigation Measure T-2. Therefore, the proposed project would not incrementally contribute to public and private tactical access impacts in a manner that would be cumulatively considerable. Cumulative impacts would be less than significant.

B.22B(1) Private Roads – Safety and Design

Proposed Project Impacts. According to the Ventura County *Initial Study Assessment Guidelines*, impacts associated with the safety and design of a private road involves the physical configuration of the road and its conformance with applicable State and local fire guidelines and ordinances (County of Ventura, 2006). The proposed project would not require the construction of, or modification to, any private roads. Access to the project area throughout implementation of the proposed project would be along public roadways. Therefore, no impacts to private roadways would occur.

Cumulative Impacts. Initial Study Section B.1, as supported by Appendix 2, provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. As addressed above, the proposed project would not require the construction of, or modification to, any private roads. Consequently, it would not incrementally contribute to any private road safety and design impacts that would be cumulatively considerable. No cumulative impacts would occur.

B.22B(2) Private Roads – Tactical Access

Proposed Project Impacts. The proposed project does not involve the modification to, or construction or use of any private roadways. Therefore, no impacts related to private road tactical access would occur.

Cumulative Impacts. Section B.1 of this Initial Study, as supported by Appendix 2, provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. As discussed above, implementation of the proposed project would have no impacts on private road tactical access. Therefore, it would not incrementally contribute to, either directly or indirectly, any cumulative impacts related to private road tactical access. No cumulative impacts would occur.

B.22C Pedestrian/Bicycle Facilities – (1) Public Facilities and (2) Private Facilities

Proposed Project Impacts. Implementation of the proposed project would temporarily increase vehicular traffic on the local roadway system and may require temporary lane closures when cut giant reed and castor bean is loaded into trucks for transport to Soule Park. However lane closures would be short-term in nature (one hour or less); consequently, the proposed project would not create a substantial barrier to existing or planned bicycle and pedestrian facilities. Additionally, the proposed project would not involve the construction of new bicycle or pedestrian facilities, or generate pedestrian or bicycle traffic volumes on any public roads, sidewalks or trails. Implementation of Mitigation Measure T-1 would require consultation with the Ventura County Transportation Department and City of Ojai Transportation Division prior to project implementation to ensure that project-related effects on traffic and circulation, including effects on pedestrian or bicycle facilities, are minimized. Therefore, impacts to pedestrian and bicycle facilities would be less than significant.

Cumulative Impacts. Section B.1 of this Initial Study, as supported by Appendix 2, provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. Combined, these projects could potentially result in pedestrian and bicycle facility impacts that are cumulatively considerable. However, pedestrian and bicycle facility impacts associated with the proposed project would be temporary in nature and can be fully mitigated to a level of less than significant with implementation of Mitigation Measure T-1. Therefore, the proposed project would not incrementally contribute to pedestrian and bicycle facility impacts in a manner that would be cumulatively considerable. Cumulative impacts would be less than significant.

B.22D Off-Street Parking

Proposed Project Impacts. As addressed in Initial Study Section A.7 (Project Description), implementation of the proposed project would require up to two crews of two to five workers and five to seven vehicles per day during its initial phase, which would occur for an estimated eight weeks (or 35 to 40 working days). The duration of the proposed project's initial activities along the creek reaches targeted for giant reed and castor bean removal would range from a few hours to several days. Project-related trucks would be parked at the closest point of a public road that provides access to the subject creek reaches, which, at localized scales, could compromise available parking. Additionally, project-related activities at Soule Park could potentially compromise available visitor parking for limited periods of time. However, implementation of Mitigation Measure T-1 would require the VCWPD to consult with the Ventura County Transportation Department and City of Ojai Transportation Division

prior to project implementation to ensure that all project-related effects on public roads and highways, including off-street parking, are minimized. Therefore, impacts to parking would be less than significant.

Cumulative Impacts. Initial Study Section B.1, as supported by Appendix 2, provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. Combined, these projects could potentially result in off-street parking impacts that are cumulatively considerable. However, off-street impacts associated with the proposed project would be temporary in nature and can be fully mitigated to a level of less than significant with implementation of Mitigation Measure T-1. Therefore, the proposed project would not incrementally contribute to off-street impacts in a manner that would be cumulatively considerable. Cumulative impacts would be less than significant.

B.22E Bus Transit

Proposed Project Impacts. Public bus routes within the proposed project area include the Gold Coast Transit Lines 16, 31X and 32X and the Ojai Trolley (City of Ojai, 2008; Gold Coast Transit, 2008). The Gold Coast Transit bus routes provide transportation between the City of Ojai, the unincorporated communities along State Route 33 (Ventura Avenue) and the incorporated cities and unincorporated areas of Ventura County located south and east of State Routes 33 and 126 (Gold Coast Transit, 2008). Within the City of Ojai, these bus routes travel along Ojai Avenue to a Park and Ride facility that is located on Fox Street (Gold Coast Transit, 2008), which is west of the proposed project area. The Ojai Trolley's fixed route provides transportation between Meiners Oaks, Mira Monte and the City of Ojai; the eastern-most road travelled by this route is that portion of Gridley Road which is located south of Grand Avenue (City of Ojai, 2008). All of the public bus routes within the proposed project area are located to the west of the creek reaches targeted for giant reed and castor bean removal. Therefore, proposed project activities along public roads would not affect public bus transportation routes or schedules. Although the proposed project would temporarily increase traffic volumes along State Route 33 due to worker commutes to and from the project area, these vehicle trips would occur in the opposite direction of peak commuting traffic flows (e.g., they would occur north-bound in the morning hours and south-bound in the afternoon/evening hours). Therefore, the temporary increase in traffic volumes due to worker commuting trips would not affect public bus routes or schedules. Additionally, the proposed project does not involve any development that would induce growth or create a need for additional public bus capacity. No impacts to public bus transit would occur.

Cumulative Impacts. Initial Study Section B.1, as supported by Appendix 2, provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. Combined, these projects could result in impacts related to bus transit that are cumulatively significant. However, as addressed above, the proposed project would not impact bus transit. Consequently, it would not incrementally contribute to bus transit impacts that would be cumulatively considerable. No cumulative impacts would occur.

B.22F Railroads

Proposed Project Impacts. Implementation of the proposed project would not involve the use of railroads or trains, and would not be located near a railroad right of way (Thomas Brothers, 2008).

Therefore, it would not interfere with existing railroad facilities or operations. No impacts would occur.

Cumulative Impacts. There are no active railroad lines within the proposed project area. Therefore, the past, present and reasonably foreseeable projects outlined in Section B.1 of this Initial Study, as supported by Appendix 2, would not affect any rail systems. Additionally, as addressed above, the proposed project would not be located near or involve the use of railroads or trains, and thus would not incrementally contribute to railroad impacts in a manner that is cumulatively considerable. No cumulative impacts would occur.

B.22G Airports

Proposed Project Impacts. As addressed in Section B.16 (Aviation Hazards), the nearest airport to the proposed project area is the Oxnard Airport. No part of the proposed project area is located within two miles of an existing airport or a privately owned landing strip and implementation of the proposed project would not involve the use of any public or private airports. Additionally, the proposed project would not involve any features or activities that would affect air traffic. Therefore, the proposed project would not interfere with County operated airports. No impacts would occur.

Cumulative Impacts. The past, present and reasonably foreseeable projects outlined in Initial Study Section B.1, as supported by Appendix 2, within the proposed project area would not incrementally combine to create a significant cumulative impact on airports or aircraft movement. Additionally, as addressed above, the proposed project would not impact publicly or privately operated airports or aircrafts. Therefore, no cumulative impacts would occur.

B.22H Harbor Facilities

Proposed Project Impacts. The proposed project area is located approximately 13.7 miles north of Ventura Harbor, 19.5 miles north of Channel Islands Harbor, and 20.5 miles north of Port Hueneme (Google Earth, 2008). Implementation of the proposed project would not involve the use of any of these harbors, either directly or indirectly. Therefore, the proposed project would not interfere with harbor facilities or operations. No impacts would occur.

Cumulative Impacts. The past, present and reasonably foreseeable projects outlined in Section B.1, as supported by Appendix 2, are primarily local in nature and involve rural, semi-rural, semi-urban and urban development and uses. While these cumulative projects include residential development that may induce growth and thus increase harbor use, at a regional scale, their incremental contribution to direct or indirect cumulative impacts to the operation of a harbor, or the demand for new or expanded harbor facilities are expected to be negligible. Additionally, as addressed above, the proposed project would not affect, directly or indirectly, harbors. Therefore, no cumulative impacts would occur.

B.22I Pipelines

Proposed Project Impacts. The proposed project does not involve the construction or operation of any pipelines. Additionally, it would not involve any grading or subsurface excavation that could affect an existing pipeline used for the transport of petroleum, petroleum-related products, natural gas, or other materials. Therefore, no impacts would occur.

Cumulative Impacts. Initial Study Section B.1, as supported by Appendix 2, provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. As addressed above, the proposed project would not impact pipelines. Consequently, it would not incrementally contribute to pipeline impacts that would be cumulatively considerable. No cumulative impacts would occur.

B.23 WATER SUPPLY

B.23A Water Supply - Quality

Proposed Project Impacts. Water quality refers to the chemical, biological, and physical quality of water used for human consumption. The quality of domestic water (i.e., potable water used for human consumption or connected to domestic plumbing fixtures) must be in compliance with the applicable State Drinking Water Standards as described in Title 22 of the California Code of Regulations, Section 64421 et seq. (County of Ventura, 2006).

According to the Ventura County *Initial Study Assessment Guidelines*, a potential water supply impact may occur if a project requires a supply of domestic water (County of Ventura, 2006). The proposed project would not include the development of any habitable structures; as such it would not require any source of potable water. No impacts to water supply quality would occur.

Cumulative Impacts. The proposed project would not require a supply of domestic water. Consequently, it would not combine with the other past, present or reasonably foreseeable projects outlined in Section B.1 to contribute to a cumulative water supply quality impact. No cumulative impacts would occur.

B.23B Water Supply – Quantity

Proposed Project Impacts. The Ventura County *General Plan* includes a requirement that each legal parcel which requires a domestic water source must have a permanent supply of water (i.e., a minimum 60-year supply) (County of Ventura, 2006). As discussed in Section B.23A, above, the proposed project would not include the development of any habitable structures, and thus would not require a source of domestic water. No impacts to water supply quantity would occur.

Cumulative Impacts. Initial Study Section B.1, as supported by Appendix 2, provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. As addressed above, the proposed project would not require a source of domestic water. Consequently, it would not incrementally contribute to water supply impacts that would be cumulatively considerable. No cumulative impacts would occur.

B.23C Water Supply - Fire Flow Requirements

Proposed Project Impacts. Fire flow is defined as the number of gallons per minute of water available from a fire hydrant in the event of an emergency situation. For private water systems, fire flow is determined by the size, construction type, use, and proximity of the system to other structures (County of Ventura, 2006).

As discussed in Section B.17 (Fire Hazards), giant reed is highly flammable. The proposed project would lessen fire risks by reducing overall fuel loads (or biomass) within upper San Antonio, McNell, Thacher, and Reeves Creeks. By reducing fire risk in the proposed project area, there would be a corresponding reduction in the need for fire hydrant water; as such, the proposed project would result in a beneficial fire flow water supply impact. No adverse impacts would occur.

Cumulative Impacts. Section B.1 of this Initial Study, as supported by Appendix 2, provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. The proposed project would lessen fire risks by reducing the amount of flammable biomass within upper San Antonio Creek and its tributaries. Therefore, it would not combine with other past, present and reasonably foreseeable projects to contribute to an impact associated with fire flow that would be cumulatively considerable. No cumulative impacts would occur.

B.24 WASTE TREATMENT/DISPOSAL

B.24A Individual Sewage Disposal Systems

Proposed Project Impacts. An individual sewage system disposes of domestic waste generated by individual residences and businesses that do not have access to public sewer services (County of Ventura, 2006). The proposed project would not involve the construction or modification of any structures; as such, it would not require an onsite sewage disposal system. No impacts would occur.

Cumulative Impacts. As discussed above, the proposed project would not require an onsite sewage disposal system. Therefore, it would not combine with the past, present or reasonably foreseeable projects outlined in Section B.1 to contribute to sewage disposal system impacts that would be cumulatively considerable. No cumulative impacts would occur.

B.24B Sewage Collection/Treatment Facilities

Proposed Project Impacts. Sewage collection and treatment facilities collect wastewater from domestic, commercial, industrial, and institutional uses, treat it to remove organic and inorganic hazardous or noxious waste materials, and subsequently discharge the treated effluent into the environment (County of Ventura, 2006). The proposed project would not generate sewage effluent, and thus would not require the use of any new or existing sewer mains or sewage treatment plants. No impacts would occur.

Cumulative Impacts. Initial Study Section B.1, as supported by Appendix 2, provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. As addressed above, the proposed project would not generate sewage effluent. Consequently, it would not combine with other past, present or reasonably foreseeable projects to contribute to a sewage collection or treatment facility impact that would be cumulatively considerable. No cumulative impacts would occur.

B.24C Solid Waste Management

Proposed Project Impacts. Any project that generates solid waste would have an impact on the demand for solid waste disposal capacity in Ventura County (County of Ventura, 2006). As described in Section A.7 (Project Description), the proposed project would involve the removal of approximately 1,000 cubic yards of giant reed, which would be transported to Soule Park for chipping. All chipped material then would be used by the Ventura County Parks Department for mulch, trail cover, and other uses that may be identified by the Parks Department. Due to the invasiveness of castor bean, any seed heads that are removed would be hauled to a landfill as a destruction load. However, the volume of seed head removed would be negligible (one to two percent of all biomass removed), and the County of Ventura currently has at least 15 years of disposal capacity available for waste generated by in-County projects. If any castor bean plant material (biomass) other than seed head is removed, it would be chipped at Soule Park and used in the same fashion as the chipped giant reed. Therefore, impacts to solid waste disposal capacity would be less than significant.

Cumulative Impacts. Section B.1 of this Initial Study, as supported by Appendix 2, provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. As discussed above, the proposed project would reuse an estimated 98 to 99 percent of all plant material that would be removed from the targeted creek reaches. The remaining one to two percent of removed biomass (i.e., castor bean seed head) would be disposed of at a landfill; however, at a regional (County-wide) scale, this contribution to landfill disposal would be negligible. Therefore, the proposed project's incremental contribution to the other past, present and reasonably foreseeable projects within the Ojai Valley area would not be cumulatively considerable. Cumulative impacts would be less than significant.

B.24D Solid Waste Facilities

Proposed Project Impacts. Solid waste operations and facilities include projects that handle, store, process, and dispose of solid waste. Solid waste facilities operate under the authority of the Local Enforcement Agency which, under the proposed project, would be the Ventura County Environmental Health Division. Solid waste facilities must be in compliance with all applicable regulations, including Title 14 of the California Health and Safety Code, Title 27 of the California Code of Regulations, and the California Public Resources Code (County of Ventura, 2006). Per the Ventura County *Initial Study Assessment Guidelines*, if a proposed project does not involve a solid waste operation or facility, it would have no impact (County of Ventura, 2006).

The proposed project is specific to non-native vegetation removal and does not involve the construction or operation of solid waste facilities. However, implementation of the proposed project would require that removed castor bean head be disposed of as a destruction load, and proposed removal activities would additionally be expected to generate solid waste in need of disposal. However, as addressed above under Initial Study Section B.24C (Solid Waste Management), the amount of solid waste material generated would be minimal and the County of Ventura currently has at least 15 years of disposal capacity available for waste generated by in-County projects. Therefore, impacts to solid waste facilities would be less than significant.

Cumulative Impacts. Initial Study Section B.1, as supported by Appendix 2, provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. As

discussed above, the proposed project's solid waste facility impacts would be less than significant. Therefore, the proposed project's incremental contribution to the other past, present and reasonably foreseeable projects within the Ojai Valley area would not be cumulatively considerable. Cumulative impacts would be less than significant.

B.25 UTILITIES – (A) Electric, (B) Gas and (C) Communication

Proposed Project Impacts. Utilities include electrical, gas and communication facilities. A proposed project could result in impacts to utilities if it would substantially increase the demand for these facilities, including: electrical generation plants, transmission substations and transmission lines; fixed natural gas transmission and distribution systems; and, structures such as radio and television transmitting and receiving antennas, radar stations, microwave towers and telephone facilities (County of Ventura, 2006). The proposed project's removal of giant reed and castor bean within the upper San Antonio Creek watershed would require the use of hand held equipment such as chain saws, clippers or loppers, and power brush cutters; no electrical, natural gas or communication facility supplies would be required. Furthermore, the project would not involve any type of development that would require new or existing utility services. Therefore, no impacts would occur.

Cumulative Impacts. Section B.1 of this Initial Study, as supported by Appendix 2, provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. As outlined above, the proposed project would not require any new or existing electric, gas, or communication facilities. Consequently, it would not combine with other past, present or reasonable foreseeable projects to contribute to a utility impact that would be cumulatively considerable. No cumulative impacts would occur.

B.26 FLOOD CONTROL/DRAINAGE

B.26A Flood Control/Drainage Facilities - Flood Control District

Proposed Project Impacts. Flood control and drainage facilities serve to remove accumulated storm waters through both man-made drainage facilities and natural channels (County of Ventura, 2006). Potential impacts to facilities under the regulatory authority or ownership of the Ventura County Watershed Protection District (formerly known as the Ventura County Flood Control District) would occur if a project affects the extent of the flood plain, the capacity of a drainage facility or channel, or the velocity of flow within a drainage facility or channel (County of Ventura, 2006).

The proposed project would reduce flood hazards that are associated with giant reed's contribution to water flow diversions, bank erosion, and debris dams. As addressed in Section B.15B (Flooding Hazard), the reduction in flood hazards due to the removal of giant reed would occur within the upper San Antonio Creek watershed, as well as further downstream along the main channel of the Ventura River. As such, the proposed project is anticipated to have a beneficial effect on flood control and drainage facilities. No adverse impacts associated with flood control or drainage facilities would occur.

Cumulative Impacts. Initial Study Section B.1, as supported by Appendix 2, provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. As discussed above, the proposed project would reduce flood hazards associated with giant reed. Beneficial

impacts would occur. Therefore, the proposed project would not combine with other past, present and reasonably foreseeable projects to contribute to a flood control or drainage facilities impact that would be cumulatively considerable. No cumulative impacts would occur.

B.26B Flood Control/Drainage Facilities - Other Facilities

Proposed Project Impacts. As described in the Ventura County *Initial Study Assessment Guidelines*, potential impacts to flood control and drainage facilities that are owned and maintained by an entity other than the Ventura County Watershed Protection District (formerly known as the Ventura County Flood Control District) would occur if a project affects the extent of the flood plain, the capacity of a drainage facility or channel, or the velocity of flow within a drainage facility or channel (County of Ventura, 2006). The proposed project would reduce flood hazards that are associated with the giant reed's contribution to water flow diversions, bank erosion, and debris dams. As such, the proposed project is anticipated to have a beneficial effect on flood control and drainage facilities. No adverse impacts associated with flood control or drainage would occur.

Cumulative Impacts. Section B.1 of this Initial Study, as supported by Appendix 2, provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. The proposed project would reduce flood hazards associated with the removal of giant reed. Therefore, it would not combine with other past, present or reasonably foreseeable projects to contribute to an impact to flood control or drainage facilities that would be cumulatively considerable. No cumulative impacts would occur.

B.27 LAW ENFORCEMENT/EMERGENCY SYSTEMS

B.27A Law Enforcement/Emergency Services - Personnel/Equipment

Proposed Project Impacts. Law enforcement and emergency service personnel consist of all individuals, both sworn and not sworn, who are used by the Ventura County Sheriff's Department to protect the County's citizens. Equipment includes the items used by personnel in the performance of their duties. A project that directly or indirectly contributes to a population increase would have the potential to impact law enforcement and emergency service personnel and equipment (County of Ventura, 2006).

The proposed project would require approximately ten workers for initial removal activities, and up to twelve workers for prescribed re-treatment activities. This small workforce would be anticipated to come from within Ventura County and commute to the project area on a daily basis. Therefore, the workforce would not affect the local population, nor would it change established officer-to-population ratios. During working hours, the proposed staging and chipping area in Soule Park would be monitored by the VCWPD or its designated contractor. During non-working hours when the park is open to the public, the staging and chipping area would be monitored by a Ventura County Parks Department ranger.

Soule Park is open to the public during the following hours (Ventura County Parks Department, 2008):

- April and May: 7:30 a.m. to 7:30 p.m.
- June through August: 7:30 a.m. to 8:00 p.m.

- September and October: 7:30 a.m. to 7:30 p.m.
- November through March: 7:30 a.m. to 5:00 p.m.

Outside of the hours listed above, the park is locked and is inaccessible to the public. As such, the staging and chipping area would be secured within a closed and locked park at night and would not necessitate law enforcement services to protect it against theft or vandalism. No impacts to law enforcement and emergency services personnel and equipment would occur.

Cumulative Impacts. Initial Study Section B.1, as supported by Appendix 2, provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. The proposed project is not growth-inducing and would not be anticipated to require the use of local law enforcement or emergency services. Consequently, it would not combine with other past, present and reasonably foreseeable projects to contribute to an impact to law enforcement and emergency services personnel and equipment that would be cumulatively considerable. No cumulative impacts would occur.

B.27B Law Enforcement/Emergency Services - Facilities

Proposed Project Impacts. Law enforcement and emergency service facilities include all buildings used to house personnel and equipment of the Ventura County Sheriff's Department for the purpose of protecting the County's citizens (County of Ventura, 2006). As addressed above, the proposed project would not be not growth-inducing; therefore, it would not introduce a need for new or expanded law enforcement and emergency service facilities. No impacts would occur.

Cumulative Impacts. The proposed project would not be growth-inducing, and is not expected to require the use of local law enforcement or emergency services. Consequently, it would not combine with other past, present and reasonably foreseeable projects to contribute to an impact to law enforcement and emergency service facilities that would be cumulatively considerable. No cumulative impacts would occur.

B.28 FIRE PROTECTION

B.28A Fire Protection Services - Distance and Response

Proposed Project Impacts. Impacts to fire protection services (distance and response time) would be considered significant if the distance of a project from a full-time paid fire department station is in excess of five miles (County of Ventura, 2006). Fire protection services for the proposed project area are provided by Division 15 of the Bureau of Emergency Services. The nearest fire station to the proposed project area is Fire Station 21, which is located at 1201 Ojai Avenue (Ventura County Fire Department, 2008). The distance of proposed giant reed removal activities from Fire Station 21 would range from approximately 0.2 to 3 miles (Rand McNally, 2007). As the proposed project is located within five miles of the nearest fire station, no impacts with regard to the distance and response time of fire protection services would occur.

Cumulative Impacts. Section B.1 of this Initial Study, as supported by Appendix 2, provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. As discussed above, proposed giant reed and castor bean removal activities would be located

within five miles of the nearest fire station. Additionally, the proposed project does not involve any type of structural development that would require long-term fire protection service. Therefore, the proposed project would not combine with other past, present and reasonably foreseeable projects to contribute to an impact to fire protection services that would be cumulatively considerable. No cumulative impacts would occur.

B.28B Fire Protection Services - Personnel, Equipment, and Facilities

Proposed Project Impacts. According to the Ventura County *Initial Study Assessment Guidelines*, one firefighter is required for every 3,000 to 4,000 persons, depending on density (County of Ventura, 2006). As discussed in Initial Study Section B.2C (Growth Inducement), the proposed project would not be growth-inducing; consequently, it would not increase the demand for fire protection service personnel, equipment, or facilities. No impacts would occur.

Cumulative Impacts. The proposed project would not increase the population of the project area and does not involve any structural development. Therefore, it would not combine with the other past, present and reasonably foreseeable projects outlined in Section B.1 and Appendix 2 to contribute to an impact to fire protection services that would be cumulatively considerable. No cumulative impacts would occur.

B.29 EDUCATION

B.29A Schools

Proposed Project Impacts. According to the Ventura County *Initial Study Assessment Guidelines*, a project would have a significant impact on school facilities if it would substantially interfere with the operations of an existing school facility, or affect the demand for schools (County of Ventura, 2006). Under the proposed project, giant reed removal activities would be located in the vicinity of the following schools:

- **San Antonio Elementary School.** This public elementary school is located south of and adjacent to proposed removal activities along McNell Creek, at the undercrossing of the intersection of Grand Avenue and Carne Road (Randy McNally, 2007).
- **The Thacher School.** This private high school is located at 5025 Thacher Road. The western side of the campus would be approximately 0.1 mile east of proposed removal activities along McNell Creek (Thacher School, 2008; Randy McNally, 2007).
- **Monica Ros School.** This private elementary school is located at 783 McNell Road, approximately 0.2 mile east of proposed removal activities along McNell Creek (Monica Ros School, 2008; Randy McNally, 2007).
- **Ojai Valley School, Upper School.** This private high school is located at 10820 Reeves Road, approximately 0.7 mile east of proposed removal activities along Reeves Creek (Ojai Valley School, 2008; Randy McNally, 2007).

The proposed project would not involve the construction or removal/displacement of any residences; consequently, it would not affect the demand for schools within the County. However, herbicide treatments and biomass removal activities adjacent to the above-referenced schools may create a potentially significant impact if they occur during periods when their respective students, faculty and staff are engaged in outdoor activities. In addition, the noise from chain saws, loppers, power brush cutters and trucks associated with project activities may disrupt school learning environments,

particularly at San Antonio Elementary School, which is located in close proximity to proposed giant reed removal activities. As described in Section A.7 (Project Description), the VCWPD would notify all property owners by mail of removal activities at least two weeks prior to work, and secure all necessary property access agreements. Active work areas near public roads or intersections would also be clearly posted with signs that would discourage plant gathering or other uses. As required by Mitigation Measure N-6, the project notifications would include a contact name and number that the above-referenced schools may call to ensure that herbicide treatments do not coincide with periods when outdoor activities are scheduled. Additionally, noise-related impacts due to the proposed project's initial phase would be temporary in nature (35 to 40 working days) and implementation of Mitigation Measures N-1 through N-5 and N-7 through N-9 would reduce them to a level of less than significant. No impacts to schools would occur following completion of the project, which is anticipated to occur in 2012.

Cumulative Impacts. Section B.1 of this Initial Study, as supported by Appendix 2, provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. These projects could involve an increase in the demand for schools due to population increases, or construction and operational activities that could affect schools. However, activities associated with the proposed project would be temporary in nature and its effects on school operations can be mitigated to a level of less than significant. Therefore, the proposed project's incremental contribution to impacts related to school operations would not be cumulatively considerable. Cumulative impacts would be less than significant.

B.29B Public Libraries

Proposed Project Impacts. A project would have a significant impact on public library facilities and services if it would substantially interfere with the operations of an existing public library facility, or put additional demands on a public library facility that is currently overcrowded (County of Ventura, 2006). The nearest public library to the proposed project area is the Ojai Library, located at 111 East Ojai Avenue, approximately 0.9 mile west of proposed giant reed removal activities along upper San Antonio Creek (Ventura County Library, 2008). As the proposed project would not involve the in-migration or removal of any residents, temporarily or permanently, it would not affect the demand for public library facilities. Given the distance of the Ojai Library from the upper San Antonio Creek, proposed giant reed and castor bean removal activities would not interfere with the operations of this library. No impacts to library facilities and services would occur.

Cumulative Impacts. Initial Study Section B.1, as supported by Appendix 2, provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. As discussed above, the proposed project would neither affect the demand for public library facilities, nor interfere with the operations of the Ojai Library. As such, the proposed project would not combine with other past, present of reasonably foreseeable projects to contribute to an impact to public libraries that would be cumulatively considerable. No cumulative impacts would occur.

B.30 RECREATION

As described in the Ventura County *Initial Study Assessment Guidelines*, a project would have a significant impact on recreation if it would cause an increase in the demand for recreational facilities, or impede the future development of recreational parks or facilities and/or regional recreational trails or corridors (County of Ventura, 2006).

B.30A Local Parks/Facilities

Proposed Project Impacts. The proposed project would not be located in the vicinity of any neighborhood park, community park facilities or playfields, or local trails or corridors (Rand McNally, 2007). No impact to local parks or facilities would occur.

Cumulative Impacts. The proposed project would not be located in the vicinity of a local park or facility; consequently, it would not contribute to local park or facility impacts that would be cumulatively considerable. No cumulative impacts to local parks or facilities would occur.

B.30B Regional Parks/Facilities

Proposed Project Impacts. The proposed project would be located within or adjacent to the following regional parks and facilities:

- **Soule Park.** Located at 1301 Soule Park Drive (off of Boardman Road), this park is operated by the Ventura County Parks Department and is the most frequently used park in the County (County of Ventura, 2005a). Recreational facilities include a tennis court, equestrian area, softball field, playgrounds, and picnic shelters. The proposed project would temporarily require an area within the park for chipping and project-related equipment and materials staging.
- **Soule Park Golf Course.** Operated by the Ventura County Parks Department, this public golf course is adjacent to Soule Park at 1033 East Ojai Avenue (Soule Park Golf Course, 2008). Hole numbers 8 and 13 are located on either side of the southwestern end of Soule Park near the equestrian area, west and east of the terminus of Soule Park Road, respectively (Aspen Environmental Group, 2008). Project activities would occur adjacent to the golf course along portions of upper San Antonio Creek and Thacher Creek.
- **Camp Comfort.** Located at 11969 North Creek Road, this campground is traversed by upper San Antonio Creek, approximately two miles downstream of the proposed project area (Rand McNally, 2007). The campground is operated by the Ventura County Parks Department, and includes 15 campsites, laundry facilities, and showers (County of Ventura, 2005b).

As addressed in Section B.2C (Growth Inducement), the proposed project would not be growth-inducing; as such, it would not increase the demand for recreational facilities, nor would it affect the development of regional parks or facilities.

The proposed project would require a chipping and staging area in Soule Park, which would likely be located adjacent to the equestrian area. The chippers would operate Mondays through Fridays between the hours of 12:00 p.m. and 6:00 p.m. to minimize disturbances to golfers using the Soule Park Golf Course. However, recreationists within Soule Park and Soule Park Golf Course would be exposed to increased noise levels during chipping activities. The proposed project may also contribute to a short-term disturbance to, or potential preclusion of, equestrian activities in Soule Park. Noise that is generated during operation of the chippers may frighten horses that are brought to the equestrian area. Therefore, the proposed project may necessitate closure of the equestrian area during operation of the

chippers to ensure the safety of horses and riders. In order to minimize impacts associated with the equestrian area, the following mitigation measures are recommended:

MM R-1 Notices at the entrance to Soule Park shall be posted that specify the days and hours during which use of the equestrian area will be restricted for safety purposes.

MM R-2 The chipping and staging area in Soule Park shall not be placed in a location that blocks access to the equestrian area. During the days and hours when the chipping equipment is not operated, project-related equipment and materials shall be stored in a manner that allows recreationists to safely access the equestrian area.

With implementation of Mitigation Measures R-1 and R-2, in combination with Mitigation Measures N-1 through N-9, as outlined in Section B.19 (Noise and Vibration), impacts to regional parks and facilities would be reduced to a level of less than significant.

Cumulative Impacts. Section B.1 of this Initial Study, as supported by Appendix 2, provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. These projects may affect regional recreational facilities as a result of either their construction or operation. However, the proposed project would be not be growth-inducing and thus would not affect the long-term operation of any regional recreational facilities. As addressed above, the proposed project may temporarily disrupt or preclude the use of the equestrian area in Soule Park during chipping activities. However, these temporary impacts can be mitigated to a level of less than significant. Consequently, the proposed project's incremental contribution to impacts associated with regional parks would not be cumulatively considerable. Cumulative impacts would be less than significant.

B.30C Regional Trails/Corridors

Proposed Project Impacts. That portion of the proposed project area that traverses McNell Creek north of Thacher Road would be located on private in-holdings within the boundaries of Los Padres National Forest (Forest). The nearest Forest trail to this area is Horn Canyon Trail, which is located approximately 0.7 mile east of McNell Creek (United States Forest Service, 2008a). Horn Canyon Trail begins at Thacher School and extends five miles to Hines Peak Road. This trail also provides access to Pines Camp, a three-site campground (United States Forest Service, 2008b). Given its distance from McNell Creek, proposed project activities would not affect recreationists on Horn Canyon Trail. No other recreational trails or corridors would be located in the vicinity of the proposed project area project (Rand McNally, 2007; Aspen Environmental Group, 2008; United States Forest Service, 2008a).

As addressed in Section B.2C (Growth Inducement), the proposed project would not involve the temporary or permanent in-migration of residents; thus, it would not increase the long-term demand for recreational facilities, including trails and corridors. Therefore, the proposed project would not impede future recreational development. No impacts to regional trails or corridors would occur.

Cumulative Impacts. Initial Study Section B.1, as supported by Appendix 2, provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. As discussed above, the proposed project would neither increase the demand for recreational trails or corridors, nor would it affect recreational activities along Horn Canyon Trail. Therefore, the proposed

project would not combine with other past, present or reasonably foreseeable projects in a manner that is cumulatively considerable. No cumulative impacts would occur.

C. Initial Study Findings and Determination

MANDATORY FINDINGS OF SIGNIFICANCE		YES/ MAYBE	NO
Based on the information contained within Sections B and C:			
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

Discussion

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?

The proposed Upper San Antonio Creek Watershed Giant Reed Removal Project would not result in any significant and unavoidable adverse impacts to the quality of the environment. To the contrary, implementation of the proposed project would result in long-term beneficial impacts to the quality of the environment by removing a highly invasive non-native plant species and allowing native vegetation to recolonize in the targeted giant reed removal areas. Long-term beneficial impacts to biological resources, groundwater, surface water, visual resources, coastal beaches and sand dunes, geologic hazards, hydraulic hazards, fire hazards, and flood control and drainage facilities would occur. All short-term adverse impacts due to the proposed project's implementation phase can be mitigated to a level of less than significant, including air quality, biological resources, noise and vibration, transportation and circulation, and recreation, as addressed in Initial Study Sections B.3, B.6, B.19, B.22 and B.30, respectively. Although highly unlikely, implementation of the proposed project could potentially affect paleontological and cultural resources; however, potential adverse impacts associated with these resources can also be mitigated to a level of less than significant, as outlined in Initial Study Sections B.9 (Paleontological Resources) and B.10 (Cultural Resources).

As addressed in Initial Study Section B.6 (Biological Resources), the proposed project would ultimately improve the habitat of fish and wildlife species, as well as the quality of habitat (and potentially the range) of special-status plant and animal species. The proposed project would not, either during its

implementation or following its completion, cause a fish or wildlife population to drop below self-sustaining levels; additionally, it would not eliminate a native plant or animal community. As detailed in Section B.10 (Cultural Resources), the proposed project would not be expected to impact any important examples of the major periods of California history or prehistory due to the location of known cultural resources within the proposed project area and because no earth-disturbing activities or other types of physical development are proposed. However, in the unlikely event that a potentially significant cultural resource is encountered, Mitigation Measure C-1, as provided in Initial Study Section B.10, would be implemented. It is therefore found that with the addition of mitigation, the proposed project would not, individually or cumulatively, cause significant adverse effects on any attribute of the environment or its quality.

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).

Implementation of the proposed project would result in short-term impacts related to air quality, biological resources, noise and vibration, transportation and circulation, and recreation; although highly unlikely, it may also result in short-term impacts to paleontological and cultural resources. However, as addressed in Initial Study Sections B.3 (Air Quality), B.6 (Biological Resources), B.9 (Paleontological Resources), B.10 (Cultural Resources), B.19 (Noise and Vibration), B.22 (Transportation and Circulation) and B.30 (Recreation), all project-related impacts can be mitigated to a level of less than significant; additionally, the vast majority of these impacts would be limited to the proposed project's initial phase of implementation, which would be completed within an estimated eight weeks, or 35 to 40 working days. In the long-term, the proposed project would improve several attributes of both the natural and man-made environments, including biological resources, groundwater, surface water, visual resources, coastal beaches and sand dunes, geologic hazards, hydraulic hazards, fire hazards, and flood control and drainage facilities. It is therefore found that the proposed project would not achieve short-term environmental goals to the disadvantage of long-term environmental goals.

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).

All of the resource/issue-specific analyses contained in Section B of this Initial Study assess the proposed project's potential impacts, both individually and cumulatively. Implementation of the proposed project would not result in any cumulatively considerable adverse impacts that would either require mitigation or be unavoidable. Under the proposed project, no cumulatively considerable impacts associated with General Plan environmental goals and policies, land use, mineral resources, visual resources, coastal beaches and sand dunes, geologic hazards, hydraulic hazards, aviation hazards, water supply, utilities, flood control and drainage, law enforcement and emergency services, and fire protection would occur. With implementation of the proposed project, less than significant cumulative impacts related to air quality, water resources, biological resources, agricultural resources, paleontological resources, cultural resources, energy resources, seismic hazards, fire hazards, hazardous materials and waste, noise and vibration, glare, public health, transportation and circulation, waste treatment and disposal, education, and

recreation would occur. It is therefore found that the proposed project would not result in impacts that would be individually limited, but cumulatively considerable.

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

The proposed project would not cause any adverse impacts on human beings, either directly or indirectly, that cannot be mitigated to a level of less than significant. Additionally, all potential direct and indirect impacts on human beings would be temporary in nature and the majority of them would occur during the proposed project's initial phase of implementation, which would be completed within an estimated eight weeks, or 35 to 40 working days. No adverse impacts of any kind would occur upon project completion, which would be anticipated to occur in 2012. Under the proposed project, long-term net benefits to human beings would include improvements to the quality of the natural environment (e.g., improved biological and visual resources conditions), improved groundwater, surface water, and coastal beach and sand dune conditions, and reduced risks related to geologic hazards, hydraulic hazards, fire hazards and flood control and drainage. It is therefore found that the proposed project would not have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly.

DETERMINATION OF ENVIRONMENTAL DOCUMENT	
On the basis of 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 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.

Date 9/3/09

Norma J. Camacho
Director
Ventura County Watershed Protection District

D. INITIAL STUDY REFERENCES

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E. INITIAL STUDY LIST OF PREPARERS AND REVIEWERS

In accordance with CEQA Guidelines Section 15063(d)(6), the following tables list the individuals that assisted with either the preparation or review of this Initial Study.

Ventura County Initial Study Reviewers

Name	County Agency	Role
Pam Lindsey	Ventura County Watershed Protection District	Project Manager
Dennis Kanthack	Ventura County Watershed Protection District	Project Restoration Coordinator
Elizabeth Martinez	Ventura County Watershed Protection District	Project Environmental Planner
Allan R. Coulson	Ventura County Department of Airports	Initial Study & Mitigated Negative Declaration (IS/MND) Reviewer
Jim Meyers	Ventura County Public Works Agency	IS/MND Reviewer
Kari Finley	Ventura County Planning Division, Resource Management Agency	IS/MND Reviewer
Brian Trushinski	Ventura County Watershed Protection District, Floodplain Management Section	IS/MND Reviewer
Jim O'Tousa	Ventura County Public Works Agency	IS/MND Reviewer
Rita Graham	Ventura County Office of Agricultural Commissioner	IS/MND Reviewer
Alicia Stratton	Ventura County Air Pollution Control District	IS/MND Reviewer
Melinda Talent	Ventura County Environmental Health Division, Resource Management Agency	IS/MND Reviewer

Initial Study Preparers

Name	Affiliation	Role
Sue Walker	Aspen Environmental Group	Project Manager, Project Description, General Plan Environmental Goals and Policies, Cultural Resources, Paleontological Resources, Mandatory Findings of Significance
Heather Blair	Aspen Environmental Group	Biological Resources
Lisa Blewitt	Aspen Environmental Group	Noise and Vibration
Scott DeBauche	Aspen Environmental Group	Mineral Resources, Agricultural Resources, Visual Resources, Energy Resources, Aviation Hazards, Fire Hazards, Hazardous Materials/Waste, Glare, Transportation/Circulation
Craig Hattori	Aspen Environmental Group	Graphics
Jacob Hawkins	Aspen Environmental Group	Public Health
Chris Huntley	Aspen Environmental Group	Biological Resources
Insun Hwang	Aspen Environmental Group	Air Quality, Noise and Vibration
Tatiana Inouye	Aspen Environmental Group	General Plan Environmental Goals and Policies, Land Use, Water Resources, Coastal Beaches and Sand Dunes, Seismic Hazards, Geologic Hazards, Hydraulic Hazards, Water Supply, Waste Treatment/Disposal, Utilities, Flood Control/Drainage, Law Enforcement/Emergency Services, Fire Protection, Education, Recreation
Jennifer Lancaster	Aspen Environmental Group	Biological Resources
Jamie Miner	Aspen Environmental Group	Biological Resources
Jason Ricks	Aspen Environmental Group	Transportation/Circulation
Kati Simpson	Aspen Environmental Group	Graphics, Report Production
Judy Spicer	Aspen Environmental Group	Document Production Coordinator
Will Walters	Aspen Environmental Group	Air Quality
Mari Maki	Conejo Archaeological Consultants	Cultural Resources

Appendix 1

Ventura County Assessor's Parcel Numbers Associated with the Proposed Project

Appendix 1
Ventura County Assessor Parcel Numbers
Upper San Antonio Creek Watershed Giant Reed Removal Project
(Upper San Antonio, Thacher, Reeves and McNell Creeks)

0140020070	0280080060	0290100520
0140090130	0280120030	0290100540
0140090390	0280120040	0290100560
0140090490	0280120195	0290100570
0140100310	0280120225	0290100580
0140100340	0280130075	0290100590
0140130050	0290010090	0290100600
0240072055	0290010145	0290110010
0240072085	0290010155	0290110350
0240072305	0290010165	0290110400
0240072345	0290010185	0290120090
0240072455	0290010450	0290120130
0240072655	0290010835	0290120140
0240072665	0290031040	0290120160
0240080100	0290031100	0290120180
0240080135	0290032020	0290130055
0240090175	0290032175	0290130075
0240090220	0290032185	0290130130
0240090325	0290032195	0290130185
0240090405	0290032200	0300010030
0240090415	0290060280	0300010080
0240101180	0290060290	0300020150
0240101190	0290070020	0300020200
0240102090	0290070040	0300030010
0240102100	0290070250	0300030020
0240102110	0290070300	0300030030
0240102120	0290070310	0300030540
0240103140	0290081065	0300040070
0240103230	0290081095	0300040090
0240112010	0290081105	0300040110
0240112240	0290081115	0300040185
0240120025	0290082025	0300040195
0240120035	0290090010	0300040225
0240120045	0290100010	0300040235
0240120055	0290100020	0300040244
0240120095	0290100140	0300040265
0240131015	0290100200	0300040265
0240131025	0290100395	0350280105
0240131035	0290100430	0350290165
0240131045	0290100475	0350290165
0240131055	0290100510	0350290175

Appendix 2

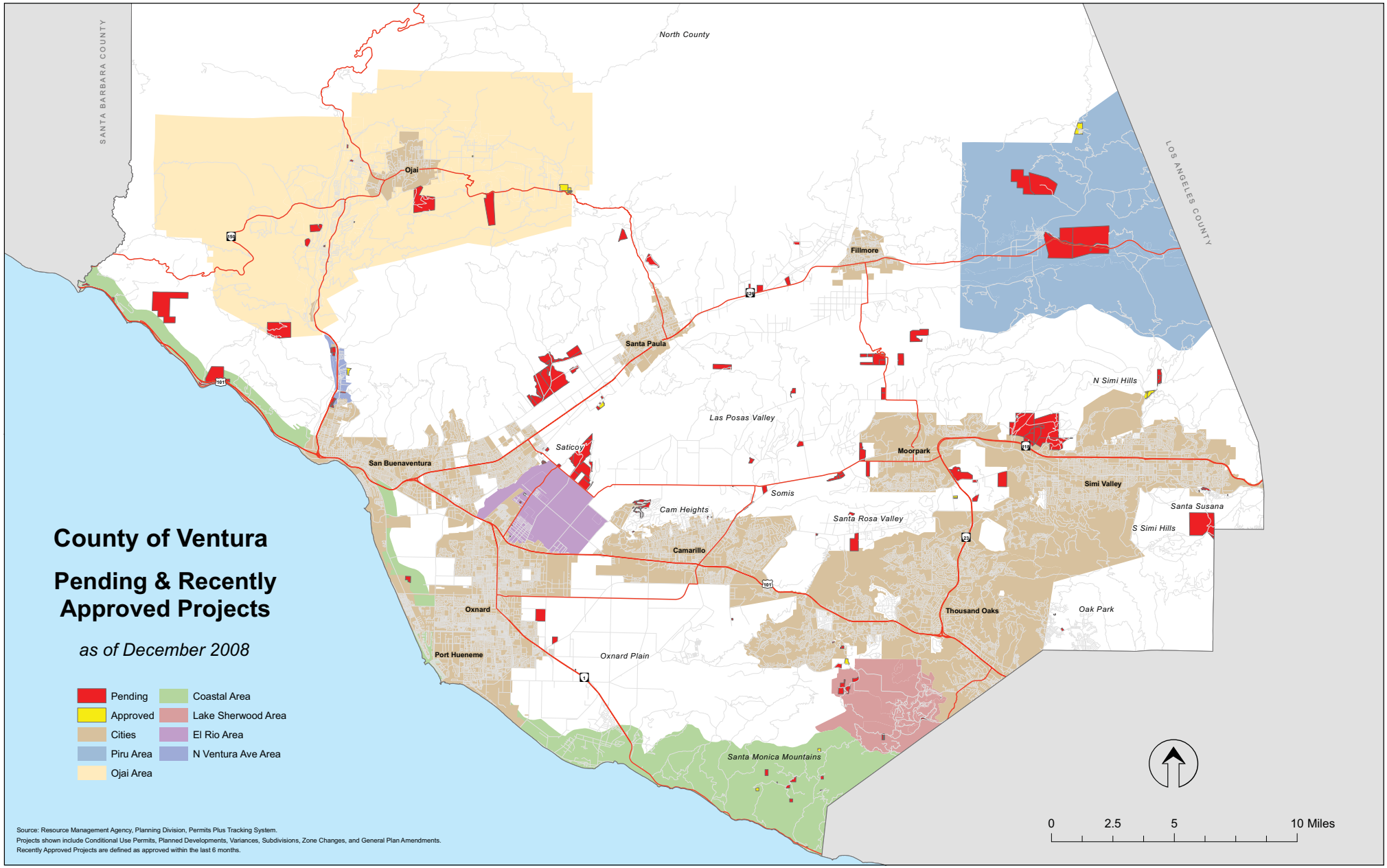
Recently Approved and Pending Development Projects within the Proposed Project Area

Summary of Recently Approved and Pending Development Projects for the Ojai Planning Area
County of Ventura, December 2008

Project Number	Address	Permit Type	Date Approved or Application Filed	Project/Permit Description
► *Recently Approved Projects*				
1	65 Baldwin Road	Conditional Use Permit	Approved 12/15/2008	The proposed project consists of a request for a Conditional Use Permit (CUP) to allow existing, unpermitted auto repair and auto sales activities to continue on-site. More specifically, the applicant is requesting a Conditional Use Permit to allow the following uses: (1) repair and reconditioning services for auto repair, including component repair (painting or body work, auto salvage, or dead storage of vehicles are not included); and, (2) retail trade including motor vehicle sales (i.e., used auto sales). The proposed project would include the storage of lubricants for auto servicing and the removal of an existing pole sign.
2	246 West El Roblar Drive	Planned Development	Approved 10/10/2008	The applicant is requesting a new Conditional Use Permit for the conversion of an existing gas station's service bay into a 896 square feet mini mart. The permittee is proposing to provide 1,012 square feet of landscaping and to update the existing signs. The project site is a 10,000 square foot corner lot with a library located to the north of the site and residences to the east.
3	11802 Koenigsten Road	Conditional Use Permit	Approved 09/08/2008	Applicant is requesting a time extension to Conditional Use Permit No. 293, which expires in April 2008. Applicant is requesting to reduce size of existing CUP boundary and add one additional well and parcel this CUP request; therefore the addition and nature of the request is large enough of a change to constitute the processing of a new CUP. Approximately 11 parcels and 13 wells are associated with this CUP request. Structures included in this CUP request include: a Quanset hut, office storage container, gas flaring units and a tank farm.
4	375 Los Cabos Lane	Minor Modification	Approved 09/30/2008	Change the designation on the existing 900 square foot Farmworker Dwelling Unit to primary dwelling. Change the designation on the 1,715 square foot primary dwelling to a Farmworker Dwelling Unit designation.
5	783 McNell Road	Minor Modification	Approved 11/19/2008	Request to time extend the existing CUP (CUP 3245) for an additional 10-year period. Current CUP involves the operation of the site as a private school for pre-school to Grade 3 children. No new structures or uses are requested with the subject permit.
► *Pending Projects*				
6	420 Ventura Avenue	Conditional Use Permit	Filed 08/23/2005	This permit request is for a new Conditional Use Permit to legalize an existing retail business identified in the Non-Coastal Zoning Ordinance, Section 8105-4 – Permitted Uses as "Rental and Leasing of Durable Goods", which also includes retail sales of landscape sand, decorative rock, wood chips/bark and gravel material (all retail) and the use of an existing 992 square foot building used by the applicant as a retail office and repair shop accessory to the commercial business all located within the "C-P-D" zone.
7	2180 Casitas Vista Road	Conditional Use Permit	Filed 03/28/2007	New Conditional Use Permit to replace expired CUP 4931 for an existing wireless communication facility located on Red Mountain at 2182 Casitas Vista Road, southwest of Oak Park.

Project Number	Address	Permit Type	Date Approved or Application Filed	Project/Permit Description
8	Assessor's Parcel Number 0600150185	Conditional Use Permit	Filed 02/07/2008	Construct a wine making and storage facility. Project would relocate an existing facility from Ventura to Oak View. The building will have a 11,331 square foot first floor, and a 1,126 square foot second floor. The remainder of the 36.2 acre site is being converted to a grape vineyard. There are six full time employees for the winery and two employees for the vineyard and as seasonable help at the winery. The facility will not be open to the public.
9	12540 Creek Road	Conditional Use Permit	Filed 03/06/2008	New CUP for expired CUP 4894- Telecommunications tower.
10	655 Burnham Road	Minor Modification	Filed 08/08/2008	Time extension to CUP 3929 for construction of additional recreational buildings and dwellings.
11	11566 North Ventura Avenue	Planned Development	Filed 08/20/2008	New Planned Development Permit for a "Retail, Eating Establishment" to re-establish the use of an existing class III restaurant.
12	8434 Ojai-Santa Paula Road	Conditional Use Permit	Filed 09/11/2008	Request to construct a 7,200 square foot accessory hay barn on the lot. Existing structures on the property include a farm labor complex with covered porch; single family residence with attached garage and covered patio; a barn; pavillion; equipment barn and equipment carport. The proposed project is a CUP for accessory structures that in total with the existing accessory structures create more than 20,000 square feet of agricultural accessory structures.
13	18 Valley Road	Minor Modification	Filed 10/29/2008	Minor Modification for a time extension for continued operation to CUP No. 3883 for an existing community center in the community of Oak View.
14	35 Alto Drive	Planned Development	Filed 12/01/2008	Planned Development Permit for construction of a 498 square foot room addition to an existing 2,950 square foot (of floor space), two-story, single family dwelling in a RA-1 acre/SRP (Scenic Resource Protection Overlay) zone in the community of Oak View.
15	Assessor's Parcel Number 0380020045	Parcel Map	Filed 05/24/2005	Creation of 34 single family lots, ranging in size from approximately 40 to 160 acres. Project is consistent with existing on-site zoning and General Plan designations. Water to be limited to existing agricultural allocation (275 acre feet per year [afy]) plus 50 afy domestic water from the City of Santa Paula. Home sites limited to 3-4 acre building pads surrounded by 200-foot fire fuel modification zone.
16	832 Oso Road	Parcel Map	Filed 05/31/2005	Subdivision of a 4.68 acre parcel into 2 lots, approximately 2.3 and 2.2 acres in size. As Designed, the subdivision would locate one principal residence on each lot, resulting in zoning conformance. The parcel is zoned RA-2 AC and is designated RR-2. A number of accessory structures are also located on the property.
17	211 North La Luna Avenue	Parcel Map	Filed 08/28/2007	Subdivision of a five acre lot, resulting into two parcels - Parcel "1" equaling 1.15 acres and Parcel "2" equaling 3.92 acres.

Source: County of Ventura, Resource Management Agency, Planning Division, Recently Approved and Pending Projects Lists – December 2008. http://www.ventura.org/rma/planning/Permits/projects.html. Accessed January 5, 2009.



County of Ventura

Pending & Recently Approved Projects

as of December 2008

- Pending
- Approved
- Cities
- Piru Area
- Ojai Area
- Coastal Area
- Lake Sherwood Area
- El Rio Area
- N Ventura Ave Area

Source: Resource Management Agency, Planning Division, Permits Plus Tracking System.
Projects shown include Conditional Use Permits, Planned Developments, Variances, Subdivisions, Zone Changes, and General Plan Amendments.
Recently Approved Projects are defined as approved within the last 6 months.

County of Ventura, Resource Management Agency, Planning Division

Pending Projects List- December 2008

Permit Number	Parcel No.	Address	Location	Date Filed	Permit Type	Status	Permit Description	Case Planner	Case Planner Phone	Applicant
GP05-0009	6450160030		Santa Susana Area	10/27/2005	General Plan Amendment	PROCESS	The proposed project consists of a General Plan Amendment, Zone Change, and Conditional Use Permit in order to develop a leasehold manufactured housing community on the project site. The proposed General Plan Amendment and Zone Change would change the existing land use/zoning designations of Existing Community - "RE-1 ac" (Rural Exclusive, one acre minimum lot size), "RE-20,000 sq ft" (Rural Exclusive, 20,000 square feet minimum lot size), and "RE-5 ac" (Rural Exclusive, five acre minimum lot size), to Existing Community - "RPD-5.14 du/ac" (Residential Planned Development, 5.14 dwelling units/acre). The applicant is proposing to develop only 100 dwelling units on the project site. The dwelling units would consist of nine, two-story manufactured homes and 91 one-story manufactured homes, ranging between 813.3 square feet (s.f.) and 1,344 s.f. in size. The manufactured homes would be delivered and installed within each homesite upon purchase of the home and execution of a lease agreement with the community management agency. The applicant is proposing 10 (10%) of the dwelling units as afford	KLEMANN, DAN	654-3588	SUNNY KNOLLS LLC
GP06-0006	6950390145	340 WILLIAMSBURG WY	Lake Sherwood Area	11/16/2006	General Plan Amendment	PROCESS	General Plan Amendment to amend the Lake Sherwood Area Plan, specifically the Recreation policy (4.6.2.3) and map change to Figure 6; to remove the corridor trail and trailhead out of Tracts 4192-4, -5 & 4409-3 and to add a trailhead along Carlisle Road within Tract 4409-6.	DONER, NICOLE	654-5042	
GP07-0004	1530130135	103 ALOSTA DR	Camarillo Heights	07/30/2007	General Plan Amendment	INCMPLTE	The proposed project consists of a General Plan Amendment, Zone Change, and Tract Map in order to subdivide an approximately 3.21-acre lot into seven lots. The proposed General Plan Amendment and Zone Change would change the Camarillo Heights Existing Community land use and zoning designation of "RE-20,000 sq ft" (Residential Exclusive, 20,000 square feet minimum lot size) to "RE-13,000 sq ft" (Residential Exclusive, 13,000 square feet minimum lot size). The proposed Tract Map would subdivide the 3.21-acre lot into seven lots that would range between 13,076 net square feet (s.f.) and 23,700 net s.f. in size. The proposed project would include approximately 10,000 cubic yards (c.y.) of grading (5,000 c.y. of cut and 5,000 c.y. of fill) of grading to construct the building pads, driveways, and drainage features for future residential development on the proposed lots. The proposed project includes the construction of approximately 100 linear feet of new drainage swales/culverts, and 10 avocado trees would be removed to accommodate the	KLEMANN, DAN	654-3588	PENGILLEY JEFF R-KAROLINA
LU04-0055	0020140075		Lockwood Valley Area	04/07/2004	Major Modification	PROCESS	MODIFY EX. MINERAL RESOURCE DEV. FACILITY Expand an existing sand and gravel mining operation by opening a new 15-acre excavation pond adjacent to the Cuyama River, increase existing truck trips from 66 Average Daily Trips (ADT) to 132 ADT, extend the project permit life from July 2007 to July 2012, change the start of truck loadings from 3:00 am to 6:00 am, and require that all new traffic to only use SR-33 north into Santa Barbara County.	MADRIGAL, DREW	654-2498	VIRGILIO MICHAEL A-E
LU04-0069	1330041015	294 BEEDY ST	El Rio Area	05/10/2004	Conditional Use Permit	PROCESS	The relocation of an existing concrete, asphalt, rubble recycling operation and sand & rock sales facility from its present location on Southern Pacific Milling Road to Beedy Street, a distance of approximately 0.8 miles. The proposed relocation of the project represents no operational changes when compared to those at the existing location. All operations and structures currently located on this portion of Beedy Street will be removed upon approval of the proposed project.	LINDER, BECKY	654-2469	BEEDY STREET PROPERT

Pending Projects include CUP's, PD's, Major Mods, Minor Mods, Variances, Subdivisions, General Plan Amendments and Zone Changes that have a status of submitted, in process or incomplete.
Source: Permits Plus Tracking System, December 2008.

County of Ventura, Resource Management Agency, Planning Division

Pending Projects List- December 2008

Permit Number	Parcel No.	Address	Location	Date Filed	Permit Type	Status	Permit Description	Case Planner	Case Planner Phone	Applicant
LU04-0072	0020140075		Lockwood Valley Area	05/14/2004	Conditional Use Permit	PROCESS	Animal Husbandry - Aquaculture: The applicant proposes to raise fish commercially as end uses to the two ponds proposed to be mined for construction aggregate (a nine-acre and fifteen-acre pond) currently being processed under LU04-0055 by the same applicant. In addition to the aquaculture in the ponds, the applicant is also proposing to raise gambusi for the State of California as a commercial venture. The gambusi are to be used for the control of mosquitos which are known to carry diseases such as West Nile Virus. These fish would be raised in two 1,100 gallon tanks to be located across the street from the ponds on the same owner's property near his private residence. The tanks are proposed here in deference to concerns raised by the California Department of Fish and Game that the gambusi not, in a flood event, be introduced into the Cuyama River.	MADRIGAL, DREW	654-2498	VIRGILIO MICHAEL A-E
LU04-0168	5000060155		Fillmore Area	11/22/2004	Minor Modification	PROCESS	Request to: (1) merge an inactive, partially reclaimed mining site (CUP 4158) with the active CEMEX mining permit, CUP 4633; (2) redesign the two reclamation plans into one plan; (3) revise mining boundaries on Phase I of CUP 4633 to better fit the actual existing topography; and (4) Apply to open Phase II of CUP 4633.	ELLISON, SCOTT	654-2495	SOUTHDOWN INC
LU05-0008	0410160310	2946 YOUNG RD	Fillmore Area	01/19/2005	Conditional Use Permit	INCMPLTE	Request for a new CUP for to legalize an existing dog kennel (Doberman Rescue) for a maximum of 226 dogs for 10 years.	LINDER, BECKY	662-6519	BRAUN ARDIS N
LU05-0113	0380080305	1141 CUMMINGS RD	Santa Paula Area	08/18/2005	Planned Development	PROCESS	The project is a Planned Development (PD) Permit (LU05-0113) and a Variance request (LU08-0010) for 74 Farmworker Housing units distributed over the two sites. Site 1 is Aliso/800 Camp (APN 064-0-310-07) which is composed of three sub-sites or "camps": 800 Camp (5 modular units to infill existing dwellings), 800 Camp North (3 modular units to infill existing dwellings), and 800 Camp East (57 modular units to be built where avocado orchards currently exist). Site 2 is Olivelands (APN 064-0-320-07) which is proposed to contain 9 modular units that will infill existing dwelling units. The requested Variance is for the provision of tandem parking; historically there have been no garages and very little area for parking, and elimination of the requirement for two covered parking spaces per dwelling. The expected average number of residents per unit is 4.5, which will result in a total of 333 new people from the proposed project. n six different assessor's tax parcels.	ANTHONY, CHUCK	650-4059	ALEXANDER TEAGUE FOR LIMONEIRA CO.
LU05-0118	0340133095	420 VENTURA AV	Ojai Area	08/23/2005	Conditional Use Permit	PROCESS	This permit request is for a new Conditional Use Permit to legalize an existing retail business identified in the Non-Coastal Zoning Ordinance, Section 8105-4 - Permitted Uses as "Rental and Leasing of Durable Goods", which also includes retail sales of landscape sand, decorative rock, wood chips/bark and gravel material (all retail) and the use of an existing 992 square foot building used by the applicant as a retail office and repair shop accessory to the commercial business all located within the "C-P-D" zone. Also related to this permit is a request for - Parcel Map Waiver, Lot Merger (See SD05-0050 for details).	LINDER, BECKY	662-6519	WEBSTER GREG

Pending Projects include CUP's, PD's, Major Mods, Minor Mods, Variances, Subdivisions, General Plan Amendments and Zone Changes that have a status of submitted, in process or incomplete.
Source: Permits Plus Tracking System, December 2008.

County of Ventura, Resource Management Agency, Planning Division

Pending Projects List- December 2008

Permit Number	Parcel No.	Address	Location	Date Filed	Permit Type	Status	Permit Description	Case Planner	Case Planner Phone	Applicant
LU05-0121	6450160030		Santa Susana Area	08/26/2005	Conditional Use Permit	PROCESS	The proposed project consists of a General Plan Amendment, Zone Change, and Conditional Use Permit in order to develop a leasehold manufactured housing community on the project site. The proposed General Plan Amendment and Zone Change would change the existing land use/zoning designations of Existing Community - "RE-1 ac" (Rural Exclusive, one acre minimum lot size), "RE-20,000 sq ft" (Rural Exclusive, 20,000 square feet minimum lot size), and "RE-5 ac" (Rural Exclusive, five acre minimum lot size), to Existing Community - "RPD-5.14 du/ac" (Residential Planned Development, 5.14 dwelling units/acre). The applicant is proposing to develop only 100 dwelling units on the project site. The dwelling units would consist of nine, two-story manufactured homes and 91 one-story manufactured homes, ranging between 813.3 square feet (s.f.) and 1,344 s.f. in size. The manufactured homes would be delivered and installed within each homesite upon purchase of the home and execution of a lease agreement with the community management agency. The applicant is proposing 10 (10%) of the dwelling units as afford	KLEMANN, DAN	654-3588	COLTON LEE COMMUNITIES, LLC
LU05-0138	5040021245	11018 LOS ANGELES AV	Los Posas Valley Area	09/21/2005	Conditional Use Permit	INCMPLTE	Request for a new Conditional Use Permit to establish the use of an existing 1,500 sq. ft office trailer for agricultural business.	LINDER, BECKY	662-6519	MURANAKA FARMS
LU05-0140	0900190165	1025 MISSION ROCK RD	Mission Rock Rd	09/29/2005	Conditional Use Permit	PROCESS	This project consists of the installation, operation and maintainence of an unmaned telecommunications facility conissting of a 100-foot monopine, with eight panel antennas mounted on the monopine at a height of 95-feet. An 11'.5" by 20' by 10', 6" (200 square foot) equipment shelter is also proposed to be located next to the monopine. All proposed structures related with this project will be enclosed with a 6-foot high chain link fence. The lease area for the proposed Cingular/ATT project is 1,000 square feet.	MALIN, CRAIG	654-2488	CINGULAR WIRELESS
LU06-0011	0990060165		Mission Rock Rd	02/02/2006	Major Modification	PROCESS	Major Modification which expands the waste streams accepted by the plant, changes the treatment processes, and totally redesigns the plant. Eliminates open tanks.	LINDER, BECKY	662-6519	SANTA CLARA WASTE WA
LU06-0020	5000450025		Tierra Rejada Valley	03/08/2006	Minor Modification	PROCESS	Proposed 3700 sq. ft. building for use in tournament events at the golf course.	BRUNSKY, HOLLEE		TIERRA REJADA GOLF CLUB
LU06-0026	1090010210	3127 W LOS ANGELES AVE	Saticoy Area	03/10/2006	Conditional Use Permit	PROCESS	RECYCLING FACILITY FOR CONCRETE, ASPHALT AND ROCK WASTE FOR SALE AND REUSE. Proposed facility to crush concrete, asphalt, and rock waste for sale and reuse. This proposal is next to, but not part of, a legal non-conforming concrete batch plant on the same site.	RICHARDS, PAT	654-5192	COCHRAN RUSSELL-LIND
LU06-0084	1090070465	955 FAIRWAY DR	Saticoy Area	06/22/2006	Minor Modification	PROCESS	This is a request by the Las Posas Country Club (golf course) to extend CUP 4414 to Jan 27, 2027. No changes to existing facilities, designs or operations are proposed.	DONER, NICOLE	654-5042	LAS POSAS COUNTRY CL

Pending Projects include CUP's, PD's, Major Mods, Minor Mods, Variances, Subdivisions, General Plan Amendments and Zone Changes that have a status of submitted, in process or incomplete.
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County of Ventura, Resource Management Agency, Planning Division

Pending Projects List- December 2008

Permit Number	Parcel No.	Address	Location	Date Filed	Permit Type	Status	Permit Description	Case Planner	Case Planner Phone	Applicant
LU06-0106	0600082405	6758 BREAKERS WY	North Coast	08/02/2006	Planned Development	PROCESS	The proposed project consists of the construction of an approximately 133 square foot (s.f.) addition to an approximately 1,356 s.f. single family dwelling. The addition would enlarge a bedroom that was created by an illegal conversion of a garage to living space (i.e., a bedroom and bathroom). The existing single family dwelling is located approximately six feet from the front property line and does not comply with the 10-foot front yard setback requirement for this lot. Furthermore, two covered parking spaces are required for the residential use of the property, however no parking spaces exist on-site and no parking is proposed as a part of this project. Therefore, the applicant is requesting approval of a variance to allow the proposed addition and the continued use of the interior living space, without providing the two parking spaces that are required for the use of the single family dwelling. The single family dwelling with the proposed addition would be approximately 15.5' in height. The Casitas Municipal Water District would continue to provide water and the	DONER, NICOLE	654-5042	HIGH KEN
LU06-0112	1610050100	5870 LOS ANGELES AV	Somis Area	08/24/2006	Conditional Use Permit	PROCESS	A Conditional Use Permit (Case No. CUP-4581) was issued for the existing greenhouse development on the subject property, which expired in 2001 without being renewed. The applicant is applying for a new Conditional Use Permit in order to allow the continued use of the existing development, and to allow approximately 242,897 square feet (s.f.) of new buildings and structures. The new buildings and structures would include the following: greenhouses; seed plug houses and germination buildings; personnel support buildings; covered shipping docks; transplanting buildings; a new residence for the property owner; new boilers; and, storage containers. (See site plan for the proposed sizes of each building and structure.) Existing access to the project site from Los Angeles Avenue is provided via an approximately 27-foot wide driveway and a 30-foot wide driveway; a new, approximately 70-foot wide access driveway/entrance from Los Angeles Avenue is proposed. An existing private septic system provides sewage disposal, and the Camrosa Water District and existing wells provide water for the nursery. No native ve	D'ANNA, MICHELLE	654-2685	FUJIMOTO SAMUEL R FA
LU06-0124	7010050215	10655 PACIFIC VIEW RD	Santa Monica Mountains	09/19/2006	Planned Development	INCMPLTE	Applicant is requesting a Planned Development permit to construct a one-story single family dwelling with an attached garage. The single family dwelling will be approximately 3,606 sq. ft. with a 1,006 sq. ft. covered proch and the attached garage would be approximately 1,064 sq. ft. The overall buidling height of the dwelling is 17 feet.	D'ANNA, MICHELLE	654-2685	JENSEN J F FAMILY TRUST
LU06-0137	5000393340	2046 TIERRA REJADA RD	Tierra Rejada Valley	10/26/2006	Conditional Use Permit	PROCESS	The applicant is seeking a CUP for an Agricultural Sales Facility with sales of non-agricultural items not propagated on site. The proposed size of the area for retail sales of non-agricultural items is 5,000 sq ft. Included in the CUP application is a request for a 10 by 20 storage shed. The existing use of the site is the wholesale propagation of plants, which is permitted by right, but the sale of non-agricultural items is not permitted. A notice of violation was issued (ZV06-0104) to the property owner for retail sales non-agricultural products and establishing a business office without a permit. No new structures are proposed as part of the CUP application. The only buildings to be approved for the CUP is the sales office shown on the site plan adjacent to the 5,000 sq. ft. area for the sale of non-agricultural items and an approximately 300 sq. ft storage shed.	LINDER, BECKY	654-2469	KEVIN KOHNER

Pending Projects include CUP's, PD's, Major Mods, Minor Mods, Variances, Subdivisions, General Plan Amendments and Zone Changes that have a status of submitted, in process or incomplete.
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County of Ventura, Resource Management Agency, Planning Division

Pending Projects List- December 2008

Permit Number	Parcel No.	Address	Location	Date Filed	Permit Type	Status	Permit Description	Case Planner	Case Planner Phone	Applicant
LU06-0142	2060147150	405 OCEAN DR	Channel Islands	11/08/2006	Planned Development	PROCESS	This permit is for the legalization of an interior re-model of an existing 2,673 SF, three-story single family dwelling and the conversion of an existing 373 SF office into a 549 SF two-car garage to abate the violations of re-modeling without the required permits. The existing non-conforming single family dwelling is approximately 33 feet two inches high and has sideyard setbacks of zero for the dwelling. The existing office has a zero sideyard setback on the north side. Access is from Ocean Blvd. via a 25 foot wide concrete driveway to the proposed garage. Water and sewage disposal is to be provided by the Channel Islands Beach Communities Services District. No trees or native vegetation would be removed. Less than fifty cubic yards of grading is proposed to prepare the project site for construction.	MADRIGAL, DREW	654-2498	LEE, BRENNEN
LU06-0157	6940210040		Lake Sherwood Area	12/07/2006	Minor Modification	PROCESS	Minor Modification to CUP 3397 for "Animal Actors of Hollywood" for the continued use (10 years with 10 year extension) of an existing animal compound that houses and trains exotic and domestic animals, including birds, for use in the film and television industry.	OZDY, ANDREA	654-2453	SHAWVER CHERYL
LU06-0158	7000010275		Santa Monica Mountains	12/07/2006	Planned Development	INCMPLTE	The proposed project consists of the construction of an approximately 2,212 square foot (s.f.) single family dwelling, 1,040 s.f. garage, and 960 s.f. stable. The single family dwelling would be approximately 25 feet in height and the garage and stable-which would be attached as one building-would be approximately 17 feet in height. Approximately 831 cubic yards (c.y.) of grading (413 c.y. of cut and 418 c.y. of fill) is proposed to prepare the project site for development. A new individual sewage disposal system (septic tank and sand filter) would provide sewage disposal service and a private well would provide water for the residential use of the property. The detached garage would provide parking on-site and a new approximately 20-foot wide driveway would provide access from Pacific View Road to the project site. The subject property currently does not have a street address; it is located on the north side of Pacific View Road, and west of Deals Flat, the headwaters of Deer Canyon, and Clarks Peak, in the Santa Monica Mountains. The project site is located approximately 1,302 feet south of Point Mugu State Park.	D'ANNA, MICHELLE	654-2685	KILLEN PATRICK-CONNIE
LU06-0162	7010030070	12320 YERBA BUENA RD	Santa Monica Mountains	12/20/2006	Major Modification	PROCESS	Major Mod to Coastal PD 1964 for teh construction of a SFR and attached garage.	MORRISSET, DEBBIE	654-3635	PETER LOWE
LU07-0001	0630050360	5301 N VENTURA AV	N Ventura Ave	01/02/2007	Minor Modification	PROCESS	BROOKS SCHOOL EXPANSION, Modification to CUP 4985 to add a total of 68,210 sq.ft. of structures to the existing studio and professional school (Brooks Institute) for film and photography. The project includes an increase in number of students (~1000 to ~2000) and faculty (~152 to ~200), and the addition of 22 acres to the CUP boundary to support a total of 627 parking spaces. Concurrently, the applicant is applying for a zone change from "M3-10,000 sq.ft." to "M2-10,000 sq.ft," a zone text amendment to allow professional schools in the "M2-10,000 sq.ft." zone, and a Parcel Map (SD07-0013) to reconfigure existing lot lines within the CUP boundary to create 6 parcels at the existing studio and professional school (Brooks Institute) for film and photography.	ANTHONY, CHUCK	650-4059	HOLLYWOOD WEST LLC

Pending Projects include CUP's, PD's, Major Mods, Minor Mods, Variances, Subdivisions, General Plan Amendments and Zone Changes that have a status of submitted, in process or incomplete.
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County of Ventura, Resource Management Agency, Planning Division

Pending Projects List- December 2008

Permit Number	Parcel No.	Address	Location	Date Filed	Permit Type	Status	Permit Description	Case Planner	Case Planner Phone	Applicant
LU07-0031	7010040095	9200 COTHARIN RD	Santa Monica Mountains	03/26/2007	Planned Development	PROCESS	The applicant requests a Planned Development (PD) permit to construct a new 6,000 sq. ft. single family dwelling, a 1,360 sq. ft. basement, 4,400 sq. ft. of attached accessory art galleries and studios and a 750 sq. ft. attached garage. The 20.8-acre site is currently developed with a two-story single family dwelling that will be demolished, and the existing shed and metal storage containers will remain. Water will be provided by water well and a private on-site septic system will provide sewage disposal. The building pad for the proposed development currently exists. All proposed grading will take place on the existing building pad. Due to the site's location within an environmentally sensitive habitat area, the applicant proposes to record a biological restrictive covenant which will prevent further development or use of the property without additional assessment of biological resources.	D'ANNA, MICHELLE	654-2685	LATTANZI MATT
LU07-0036	0600280050	2180 CASITAS VISTA RD	Ojai Area	03/28/2007	Conditional Use Permit	PROCESS	New Conditional Use Permit to replace expired CUP 4931 for an existing wireless communication facility located on Red Mountain at 2182 Casitas Vista Road, southwest of Oak Park.. American Tower site no. 301005.	MALIN, CRAIG	654-2403	AMERICAN TOWER
LU07-0037	6850207535	4997 KILBURN CT	Oak Park Area	03/28/2007	Conditional Use Permit	PROCESS	New Conditional Use Permit to replace expired CUP 4931 for an existing wireless communication facility located at 4977 Kilburn Court in Oak Park, east of Lindero Canyon Road. Site is locate on the hill adjacent to the water tank, American Tower site No. 300762.	MALIN, CRAIG	654-2403	AMERICAN TOWER CORP
LU07-0043	0600380030	3945 PACIFIC COAST HWY	North Coast	04/04/2007	Planned Development	INCMPLTE	Coastal Planned Development required to process Parcel Map 5729 (SD07-0018 primary billing)	MORRISSET, DEBBIE	654-3635	FARIA FAM PART LTD R
LU07-0047	0680010015	2951 N VENTURA AV	N Ventura Ave	04/12/2007	Minor Modification	INCMPLTE	Add to an existing parent permit 3 new buildings which are to be legalized by this permit if granted. Delete 11 assorted facilities.	MADRIGAL, DREW	654-2498	ZERMANO RONALD-JULIE TR ET AL
LU07-0048	6150150295	2801 MADERA RD	Simi Valley Area	04/13/2007	Major Modification	PROCESS	Request for Major Modification No. 8 to CUP-3142 - Simi Valley Landfill. This request includes the following items: - Lateral and vertical expansion of existing landfill including expansion of its Conditional Use Permit (CUP) boundary from 297 acres to approximately 887.1 acres. - expansion of the landfill operations area by approximately 215 acres to increase capacity and the operational life of the landfill from 2024 @3,000 tpd to 2051 or longer at 6,000 tpd. - Increase maximum elevation from 1118 ft ms to 1270 ft ms - creation of approximately 516 acres of buffer area between the landfill operations area and adjacent land uses. -Daily tonnage limits of all materials stay at 9,250 tpd, however, material would decrease from 6,250 tpd to 3,250 tpd. - Addition of a Material Recovery Facility/ Recyclables Transfer	LINDER, BECKY	654-2469	WASTE MANAGEMENT OF CA

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LU07-0073	5000370285		Tierra Rejada Valley	06/14/2007	Conditional Use Permit	INCMPLTE	The project consists of developing 63 acres of a 138 acre parcel with the following: 1) Church related-facilities (located on approximately 45 acres of the property) including: a) a 5,000 seat amphitheater to be used for weekly church services; b) a 1,000 seat indoor Multi-Purpose Auditorium; and c) buildings for Early Childhood, Children's Ministries, Adult Ministries, the Eternity Bible College, maintenance facilities, restrooms, administration buildings, and a 300 seat Chapel. Future development noted, but not yet proposed, may include additional parking, classroom space, and an indoor worship center seating approximately 3,000 people. [Additional information (e.g., plans) will be required to analyze the proposed "future" development, or the Planning Division will be requesting the applicant to delete the future development from the project description.] 2) Athletic Fields (located on approximately 5 acres in the northwesterly corner of the property) would contain two community playfields to be used by the local facility. 3) A Children's Hunger Fund (located on 10 acres in the northeasterly corner of the prope	KLEMANN, DAN	654-3588	FIRST BIBLE CHURCH OF SIMI VALLEY
LU07-0077	5000140065	8255 GRIMES CANYON RD	Las Posas Valley	06/20/2007	Conditional Use Permit	PROCESS	The applicant is seeking a Conditional Use Permit to legalize two onsite uses. The first operation is a medium sized organics processing operation, where green waste will taken to the site from various Southern Califirnia areas and converted into mulch, etc. The applicant has requested a medium sized processing operation, which according to the Non-Coastal Zoning ordinance, limits the opearation to a maximum of 1,000 cubic yards of green waste allowed onsite at any given time. A total of 6 employees will be onsite to conduct onsite organics processing activities. A trailer is also proposed near the processing operation for use as an office and will provide bathroom facilities for the organics processing operation employees. The second use of the property consists of the legalization of an agricultural contractors' service and storage yard. Trailers containing agricultural related supplies are stored onsite, with movement every 3 weeks. Biological features on the parcel include: a creek disecting the the property; vegetation, wetlands, and a waterbodies buffer.	ROODSARI, KRISTINA	654-2467	MAGDALENO MIGUEL TR
LU07-0093	0600100385	5210 PACIFIC COAST HIGHWAY	North Coast	07/09/2007	Conditional Use Permit	PROCESS	The application is for the addition of three emergency telecommunication antennas to be added to the existing telecommunications array at North Coast Fire Station No. 25.	MADRIGAL, DREW	654-2498	VENTURA COUNTY
LU07-0095	6580052200		Thousand Oaks Area	07/16/2007	Conditional Use Permit	INCMPLTE	CUP for grading in the SRP overlay zone for the construction of a 4,475 sq.ft. single family dwelling. The development includes installation of a swimming pool and retainer walls. Grading will consist of approximately 5,100 c.y. over an approximately 1 acre area. This project is being processed simultaneously with CC of C/Parcel Map No. SD06-0063.	ROODSARI, KRISTINA	654-2467	WIGGINS MICHAEL M-NA

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LU07-0098	0900190295	1015 MISSION ROCK RD	Mission Rock Rd	07/23/2007	Conditional Use Permit	PROCESS	The applicant is requesting a new Conditional Use Permit (CUP) for an "Auto Salvage and Wrecking Yard with Ancillary Retail Sales of Salvaged Materials" (Ventura County Non -Coastal Zoning Ordinance Section 8105-5 - Permitted Uses in Commercial and Industrial Zones) on a 2.18 acre parcel. The request includes the construction of a 9,600 sf warehouse with a 2,100 sf interior office. Auto dismantiling, auto salvage and auto scrap metal recycling facility. 5% via UPS/ internet sales and 5% sales is delivery by applicant to customer of larger parts not deliverable by UPS (2x/month via small flatbed truck). Left over auto hulls (frames) are hauled away by outside vender companies for recycling offsite 2x/month.	LINDER, BECKY	662-6519	PIERCE HEATHER & ROBERT
LU07-0114	6470120050		Box Canyon Area	08/27/2007	Planned Development	PROCESS	The applicant is proposing to develop a vacant lot with two buildings comprising a total of six medical/dental offices. Medical/Dental offices are permitted uses in the "C1" (Neighborhood Commercial Zone) per Ventura Non-Coastal Zoning Ordinance Section 8105-5 Health Services Such As Professional Offices and Out-Patient Clinics upon approval of a Planning Director approved Planned Development Permit. The two buildings each have a building footprint of 4,977 SF for a 23 percent total building coverage of the 46,167 SF lot (50 percent building coverage is allowed). Building A, located towards Santa Susanna Pass Road on the northern portion of the lot, is two stories with offices on the second floor and parking on the first floor. Building B, located towards the southern portion of the lot, is two stores with offices on both the first and second floors. The applicant anticipates a total of eighteen employees for the six offices. The project requires 75 parking spaces, 80 parking spaces are provided: 8 handicap, 45 standard, 23 compact. Access to the project is off Santa Susanna Pass Road	MADRIGAL, DREW	654-2498	MONK IRREVOCABLE TRUST
LU07-0121	0900010065	928 CUMMINGS RD	Santa Paula Area	09/18/2007	Conditional Use Permit	PROCESS	Request for a new Conditional Use Permit for an "Agrcultural Promotion Facility" which will include the following 6 activities: 1- Hot air balloon rides 2- Bicycle touring 3- Citrus ranch tours 4- Dinner in the orchards 5- Chuck wagon lunch 6- Packing house tours Negative Declaration, Project condition and PC Staff Report to Becky Linder October 10-24-08	LINDER, BECKY	662-6519	LIMONEIRA ASSOCIATES

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LU07-0135	2180093100	4164 RAYTHEON RD	Oxnard Plain	10/24/2007	Conditional Use Permit	INCMPLTE	Applicant is requesting a Conditional Use Permit for an agricultural contractors' service and storage yard. The storage yard will be used to store approximately 10 medium sized trailers overnight and on the weekends, when not in use at local area agricultural fields. The applicant is also requesting the conversion of a 1901 square foot market into non-habitable storage; the construction of a 576 square foot patio; and the construction of a 976 square foot cooler. The applicant proposes operaton of the agricultural storage yard from approximately 7AM to 6PM, Monday through Saturday. Other fearures onsite include a six foot high chain link fence surrounding the agricultural storage yard portion of the parcel, an electric gate surrounding a portion of the property facing Raytheon Rd. and an existing monopole.	ROODSARI, KRISTINA	654-2467	ESPINOZA DAVID
LU07-0140	7000122015	11340 PACIFIC VIEW RD	Santa Monica Mountains	11/02/2007	Planned Development	INCMPLTE	2,300 sq.ft. addition and 2000 sq.ft. barn/garage to an existing single family dwelling.	D'ANNA, MICHELLE	654-2685	COZEN KEVIN
LU07-0142	1630010125	3250 SOMIS RD	Somis Area	11/14/2007	Planned Development	PROCESS	The project consists of Tentative Parcel Map No. PM-5788 (SD07-0064) to legalize and subdivide three illegally created parcels and one remainder parcel into three legal lots, ranging in size between .84 to 2.46 acres; and one remaining parcel of 15.08 acres, which would be granted to the Union Pacific Railroad (UPRR). The project also involves a Planning Director approved Planned Development permit application (LU07-0142) to construct a new self storage facility (with offices, a caretaker residence, and covered RV Storage) and a Planning Director approved Conditional Use Permit application (LU08-0013) for continued use of the AgRx agriculture chemical distribution facility. All existing buildings and structures will be either razed or relocated, and 15 buildings totaling 137,436 square foot (s.f.) ranging in height from 12 to 28.5 feet will be constructed to facilitate the proposed uses. One of the buildings proposed to be demolished is the Walnut Dehydrating Building (currently Camarillo Somis Feed Store) considered by the County Cultural Heritage Board to be historically significant because of its association with	DONER, NICOLE	654-5042	BURDULLIS JOSEPH-COR
LU07-0144	2180082025	3655 DUFAU RD	Oxnard Plain	11/27/2007	Conditional Use Permit	INCMPLTE	Ag Contractor service and storage yard to include a new 5,239 square foot paciing building on a 1.54 acre parcel zoned AE in the unicorporated area of Ventura County.	MADRIGAL, DREW	654-2498	LUJAN JUAN E-AMELIA
LU07-0151	1610110055	4500 LOS ANGELES AV	Somis Area	12/19/2007	Minor Modification	PROCESS	Permit filed to abate violations on the site. The applicant is requesting Planning Director approval of a Planned Development Permit to legalize a cabinet shop, sewing business, and contractor's storage yard.	MADRIGAL, DREW	654-2498	LOVATO JOHN R-GRACIE
LU07-0153	0080160450	8310 BATES RD	North Coast	12/21/2007	Conditional Use Permit	PROCESS	Conditional Use Permit for the construction of two farmworker dwelling units on a vacant 10 acre lot under LCA contract (1800 sq.ft. and 1025 sq.ft.) plus garage for each FWDU. See LU08-0043 for SFD component of project.	OZDY, ANDREA	654-2453	KLINK JOHN M-PATRICIA D
LU08-0002	0560070065	4061 E CENTER ST	Piru Area	01/04/2008	Conditional Use Permit	PROCESS	This application is for the renewal of an expired Conditional Use Permit (Case No. CUP-4889) for a County of Ventura Medical Clinic.	NEWMAN, TERRY	645-1364	CH CATHOLIC ROMAN AR
LU08-0004	1100210270	6201 OLD BALCOM CANYON RD	Las Posas Valley	01/08/2008	Conditional Use Permit	PROCESS	The applicant is requesting approval of a Conditional Use Permit to allow "Festivals, Animal Shows, and Similar, Temporary Outdoor, "specifically temporary outdoor wedding events at the subject property. The wedding events would be located in approximately 3 acres in the northwest portion of the property. The proposed parking is for 100 for the up to 200 people in the wedding party, family, and guests. Fourteen "staff parking spaces" are provided for the service employees expected at wedding events. The applicants are to utilize valet parking for the parking of vehicles. Wedding events are to occur on Saturdays and Sundays only from April to October and end by no later than 10:00 p.m. No more than one event per Saturday or Sunday is to occur on the subject site. Security personnel with CPR training are to be provided. Trash is to be handled by Harrison EJ and Sons.	BRUNSKY, HOLLEE		AMODEI JENNIFER

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LU08-0008	1080010115	19100 SOUTH MOUNTAIN RD	Las Posas Valley	01/25/2008	Major Modification	PROCESS	Major Modification to time extend CUP 3310 for an additional ten years.	MALIN, CRAIG	654-2488	MARTHA DIAZ
LU08-0010	0640310070	1141 CUMMINGS RD	Santa Paula Area	02/06/2008	Variance	PROCESS	A variance request to allow for tandem parking for the existing farmworker housing units of the Aliso/800 Camps and the Olivelands camp located on Limoneira-owned property west of Santa Paula. This request is a component of the propposed 74-unit farmworker housing project of the Limoneira Company (LU05-0113).	ANTHONY, CHUCK	650-4059	LIMONEIRA ASSOCIATES
LU08-0011	0600150185		Ojai Area	02/07/2008	Conditional Use Permit	PROCESS	Construct a wine making and storage facility. Project would relocate an existing facility from Ventura to Oak View. The building will have a 11,331 sq ft first floor, and a 1,126 sq ft second floor. The remainder of the 36.2 acre site is being converted to a grape vineyard. There are six full time employees for the winery and two employees for the vineyard and as seasonable help at the winery. The facility will not be open to the public. It will produce approximately 3,000 cases of wine per year.	NEWMAN, TERRY	654-3136	KRANKL MANFRED-ELAINE V TR
LU08-0016	1080180035	8090 BALCOM CANYON RD	Las Posas Valley	02/22/2008	Conditional Use Permit	INCMPLTE	Applicant requests a Conditional Use Permit to construct a 1,797 sq. ft. farmworker dwelling unit and a separate 436 sq. ft. two-car garage.	ANTHONY, CHUCK	650-4059	KIWITT MICHAEL J-BAR
LU08-0017	1450180075	2557 CORTEZ ST	El Rio Area	02/27/2008	Planned Development	PROCESS	New Land Use Permit request pursuant to VCZO Section 8105-5 -Permitted Uses in the Commercial and Industrial Zones (Matrix) for "Manufacturing Industries" (Planned Development Planning Director approved Use only) for the construction of two - 1-story w/ mezanine, Industrial Condominium buildings on a 4.6 acre lot, zoned "M-2" with a total of 99,500 sf. of new construction and 27 units and the demolition of two existing industrial buildings. Also being processed with SD08-0006- Condo Subdivision	LINDER, BECKY	654-2469	SLR OXNARD INV LLC
LU08-0020	0600380130		North Coast	03/06/2008	Conditional Use Permit	PROCESS	New CUP for expired existing communications facility (CUP 4888), which expired prior to the submittal of this application. No new structures or equipment are proposed withthis project, just a request for a 10-year continuation of existing communicatins facility. The facility includes: three microwave dish antennas, with a maximum diamete of 4 feet; eight, 1' by 4" directional panel antennsl one 2-foot LORAN whip antenna and one =, 4" wide & 18" high GPS disk antenna mounted on the roof of the equipment shelter. Operator: Verizon Wireless Permittee: American Tower	MALIN, CRAIG	654-2488	MARHA DIAZ OF PARAGON CONSULTING
LU08-0021	0350010165	12540 CREEK RD	Ojai Area	03/06/2008	Conditional Use Permit	PROCESS	New CUP for expired CUP 4894 Operator: Verizon Permittee: American Tower	MALIN, CRAIG	654-2488	MARTHA DIAZ OF PARAGON CONSULTING
LU08-0022	0410280040	199 TOLAND RD	Santa Paula Area	03/06/2008	Conditional Use Permit	INCMPLTE	Request for a new Conditional Use Permit for a "Communication Facility" for Sprint (Site VR73XC909-B) which includes the following: 12 antennas on a 55' monopine and equipment cabinets in a 400 square foot lease area located at 199 Toland Road, east of Santa Paula.	MALIN, CRAIG	654-2488	SPRINT-NEXTEL

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LU08-0030	6940140055	1750 HIDDEN VALLEY RD	Lake Sherwood Area	03/31/2008	Conditional Use Permit	INCMPLTE	Project Description: To replace an expired conditional use permit for the continued use of seven (7) farm worker dwellings, addition of 649 sq. ft. to the manager's farm worker dwelling, and the approval of 7,908 sq. ft. of Ag. Accessory buildings which exceed the 20,000 sq. ft. allowed by ministerial permit. This request, if approved, will be granted for a period of ten (10). The previous (expired) permit is CUP4231. The 2,270 sq. ft. pool enclosure and 3,263 sq, ft. detached garage are not a part of this permit.	NEWMAN, TERRY	645-1364	CASSAR HUGH R-LYNN K
LU08-0041	1450151210	2950 VINEYARD AV	El Rio Area	04/17/2008	Conditional Use Permit	INCMPLTE	Project Description: The proposed project consists of a Conditional Use Permit for the construction of a 3100 square foot Express Car Wash on a .65 acre property zoned CPD.	NEWMAN, TERRY	645-1364	NOURANI SHAHAB
LU08-0042	5000140095	11665 BROADWAY	Los Posas Valley Area	04/29/2008	Conditional Use Permit	INCMPLTE	17,640 SQ.FT. HORSE ARENA	ANTHONY, CHUCK	650-4059	THISSEN JERRY
LU08-0043	0080160450	8310 BATES RD	North Coast	04/30/2008	Planned Development	PROCESS	Proposed Planned Development for the construction of a new single family dwelling, grading over 50 cubic yards, and brush clearance over 1/2 acre. This project is being processed in conjunction with LU07-0153 for the construction of two farmworker dwellings.	OZDY, ANDREA	654-2453	KLINK JOHN M-PATRICIA D
LU08-0045	0040190105	17266 LOCKWOOD VALLEY RD	Lockwood Valley Area	05/01/2008	Minor Modification	PROCESS	INCREASE NUMBER OF DOGS CURRENTLY PERMITTED UNDER LU04-0176 FROM 20 TO 80. NO NEW STRUCTURES ARE PROPOSED TO HOUSE THE ADDITIONAL 60 DOGS.	NEWMAN, TERRY	645-1364	ILES JULIE A
LU08-0046	0600010090	7251 PACIFIC COAST HWY	North Coast	05/02/2008	Conditional Use Permit	PROCESS	Request to continue use of existing communications facility site. This request is a new Conditional Use Permit as the existing CUP 4973 had expired prior to submittal of this application. Equipment included with this request include the continued use of 35 foot tall monopole; with four carrier antennas mounted to the 35-height level of the monopole and a 200 square foot shelter. All equipment will be enclosed within a 6-foot high chain link fence. American Tower managed facility with Sprint/Nextel operated equipment.	MALIN, CRAIG	654-2488	MARTHA DIAZOF PARAGON CONSULTING FOR AMERICAN TO
LU08-0047	0550220065	5164 E TELEGRAPH RD	Piru Area	05/08/2008	Conditional Use Permit	INCMPLTE	Request for a new CUP to include two phases of construction. Phase 1 includes the demolition of the existing unpermitted fruit stand and the construction of a 4,800 square foot large agricultural sales facility. Pumpkin patch and "pick your own crops" activities are also proposed to be used in conjunction with the large agricultural sales facility. Phase 2 includes the construction of a 14, 500 square foot accessory building; which will house the relocated Camulos Ranch office and also be used for storage. Zoning of Parcel is AE-40AC and AE-40AC/MRP. The site is also noted as a registered landmark.	ROODSARI, KRISTINA	654-2467	CAMULOS RANCH

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LU08-0049	2340060360	1735 PANCHO RD	S Camarillo Area	05/09/2008	Conditional Use Permit	PROCESS	The applicant is requesting approval of a Conditional Use Permit to allow "Festivals, Animal Shows and Similar Events, Temporary Outdoor," specifically temporary, outdoor wedding events at the subject property. Other types of events shall be permitted such as birthday or anniversary celebrations, non-profit and charity events, and other similar temporary events. The weddings and similar events shall be located in the northeast area on the property using approximately one acre of the 2.86 acre parcel Wedding and similar events shall be limited to Saturdays and Sundays, from 12:00 PM to 10:00 PM, for a maximum of 35 days within any given calendar year. The days and hours of operation shall apply to all wedding and similar event ceremonies and receptions. Each event host will have use of the property beginning at 8:00 AM the day of the event ending at 11:00 PM. Event music shall be limited to Saturdays and Sundays, from 12:00 PM to 10:00 PM. A maximum of 150 guests/attendees shall be allowed. Catered food shall be prepared off-site and transported to the project site for each event. Portable restr	HOLLEE BRUNSKY	654-3528	MONAHAN KIMBERLEY
LU08-0050	0630040175	5777 N. VENTURA AVE	Ventura Ave Area	05/12/2008	Minor Modification	PROCESS	Request for Minor Mod to PD-1724 for a 10-year TIME EXTENSION of an existing permanent HOUSEHOLD HAZARDOUS WASTE COLLECTION FACILITYoperated by Public Works Agency, Integrated Waste Management Department. County Sheriff's Dept. also leases an office space in the existing building and occasionally uses the site for canine training.	LINDER, BECKY	654-2469	VENTURA COUNTY OF
LU08-0054	1630030740	9550 LOS ANGELES AV	Somis Area	05/16/2008	Minor Modification	INCMPLTE	Minor Modificiation to CUP-4492 - Ventura County Water Works Districti No.1. increase capacity of wastewater treatment plan from 3 mill. gallon per day (MGD) to 5 MGD including construction of a 4,000 sq. ft. Admin/Lab building and installation of new equiipment.	LINDER, BECKY	654-2469	VENTURA CO WATERWORK
LU08-0055	0400100205	5400 RAFFERTY RD	N Santa Paula Area	05/19/2008	Conditional Use Permit	PROCESS	Conditional Use Permit for an unmanned telecommunications facility consisting of a total of 12 antennas mounted on a 50 foot monopalm and equipment cabinets within a chain link fence enclosure at grade. Verizon Wireless site No. Bridge 107VW005A.	MALIN, CRAIG	654-2488	VERIZON WIRELESS
LU08-0056	0410210210		Fillmore Area	05/19/2008	Conditional Use Permit	PROCESS	Conditional Use Permit to construct an unmanned telecommunications facility consisting of 12 antennas on three arrays mounted on a new 60 foot thall monopine, (1) generator, (1) microwave, (1) utility drop pole and (4) equipment cabintets mounted on a concrete slab within a six foot chain link fence at grade. Verizon Wireless site No. Osborn 107VW014A.	MALIN, CRAIG	654-2488	VINCE AMAYA OF DELTA GROUPS ENGINEERING
LU08-0057	6850250095	5450 CHURCHWOOD DR	Oak Park Area	05/22/2008	Minor Modification	PROCESS	The applicant is requesting a 30 year time extension for the existing Church of the Epiphany, located in Oak Park.	NEWMAN, TERRY	654-3136	CH EPISCOPAL PROTEST
LU08-0060	1630140160	8620 SANTA ROSA RD	Santa Rosa Valley	06/02/2008	Conditional Use Permit	PROCESS	The applicant is requesting approval of a Conditional Use Permit to allow "Festivals, Animal Shows and Similar Events, Temporary Outdoor," specifically temporary, outdoor wedding events, birthday and anniversary celebrations, non-profit and charity events, family reunions, corporate events, and similar temporary events. Temporary events shall be limited to 300 guests for a maximum of 60 days within the calendar year. Parcel A (APN 163-0-140-160) is a 4.45 acre parcel and will be be where wedding ceremonies and receptions (or similar temporary events) would take place. The temporary events will be located on approximately one (1) acre (garden and terrace areas immediately adjacent to and south of the existing residence), known as Maravilla Gardens. The caterer's preparation area is located southwest of the existing residence, adjacent to the reception area. (See Exhibit "3", Site Plan). No new permanent structures (i.e. outdoor lighting and accessory structures) are to be constructed for temporary events; the use of a temporary tent may be used for inclement weather. The single-family residence is restricted to the owner's use and will not be leased out. The on	HOLLEE BRUNSKY	654-3528	MARAVILLA ANTONIO E-

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LU08-0062	0550202010	4268 CENTER ST	Piru Area	06/03/2008	Planned Development	INCMPLTE	The proposal is to construct 66-units of multi-family affordable farmworker rental housing with a community room and a recreational soccer field. The project site holds a former labor camp that will be demolished to build the proposed project. The development will consist of a mix of duplex, triplex, and fourplex structures, two and three stories in height, clustered along the north and southeastern portions of the site. The development will also include a courtyard building and 154 onsite parking spaces.	D'ANNA, MICHELLE	654-2685	CABRILLO ECONOMIC DEV CORP
LU08-0064	6940140055	1750 HIDDEN VALLEY RD	Lake Sherwood Area	06/09/2008	Planned Development	INCMPLTE	ACCESSORY STRUCTURES OVER 2,000 SQ.FT. SEE LU 08-0030 FOR CUP New Case determined that the residential uses (pool house and garage) should be processed seperately as a PD while the the equestrian (horse breeding uses) are being processed as a CUP (LU08-0030). The expired CUP4231 was previously issued as a permit for both uses.	NEWMAN, TERRY	645-1364	CASSAR HUGH R-LYNN K
LU08-0070	2170012145	1557 S RICE AV	Oxnard Plain	06/23/2008	Minor Modification	INCMPLTE	Minor Modification for a 10 year time extension to Conditional Use Permit No. 5139 for an existing wireless communication facility located at the southwest corner of Rice and Wooley Roads east of Oxnard. Site is Cingular Wireless No. SB0V74.	MALIN, CRAIG	654-2488	NEW CINGULAR WIRELESS
LU08-0073	1100170490	5250 KINGSGROVE DR	Las Posas Valley	06/24/2008	Conditional Use Permit	INCMPLTE	This project is a new CUP for Festivals, Animal Shows and Temporary Outdoor Events pursuant to Section 8102-0 of the Non-Coastal Zoning Ordinance. The application request involves permitting non-commercial horse events; equestrian clinics; training and dressage shows to occur on site. Horse owners will travel to the site approximately six (6) weekends each year for evaluation (judging) of their horse and the experience of performing under show conditions. The events shall occur between 8:00AM and 4:30PM on Saturday and Sunday- with no night events. AE-40 acre zoning.	ROODSARI, KRISTINA	654-2467	THOMAS FAM LIMTD PART
LU08-0074	1830010625	1050 GONZALES RD	Oxnard Area	06/27/2008	Major Modification	INCMPLTE	Applicant, Veneco, proposes to re-enter the existing lease well #917 (within CUP 477) in the Coastal Agricultural Zone and re-drill to a new bottom hole location approximately 400 feet west of the wellhead. The well will be directionally drilled to the bottom hole target located approxmately 1,650 fee due south of the surface location at a total depth of approximately 12,300 fee below ground surface. The well will be produced using a rod pump and Rotaflex 1150 pumping unit. To achieve the required well pad dimensions of 120 feet wide by 300 feet long, (an expansion of approx. 40 feet into the agricultural land), the existing agricultural land will be filled in around the perimeter of the existing pad with a combination of gravel and road base and grading of more than 50 cyd (1,500-2,000 cyd) would be proposed resulting in a loss of .3 acres of ag land. The existing well location will be also improved by laying a new layer of gravel and the pad will be surrounded by a one foot high, one foot wide earthen containment berm. Access to the site will be via the existing oil field access road from Gonzales Road. Parking and staging	DONER, NICOLE	654-5042	VENOCO INC.

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LU08-0079	0600082435	6768 BREAKERS WAY	North Coast	07/08/2008	Planned Development	PROCESS	The proposal is to demolish the existing one-story dwelling and construct a new two-story dwelling, approximately 2,730 square feet in size. The rear of the property abuts a public beach. The proposed dwelling will be constructed to an average setback of fifteen feet from the rear property line at the ground level. The rear building wall would be staggered against the rear property line such that on the north side of the property, the distance between the rear building wall and the rear property line will be sixteen feet, and on the south side of the property, the rear building wall would be fourteen feet from the rear property line. On the ground level, a deck will extend at grade to the rear property line. The second level of the dwelling will have a balcony that extends to within an average of 8.5 feet of the rear property line, staggered consistently with the rear building wall. Three-foot side setbacks are maintained on site. There is a fifteen-foot easement along the front property line, and a ten-foot front setback is proposed beyond the edge of the easement.	D'ANNA, MICHELLE	654-2685	GRAVES LARRY DEAN
LU08-0085	0900110300	11351 COUNTY DR	Saticoy Area	07/17/2008	Major Modification	INCMPLTE	This project is a major modificaiton to LU06-0012, approved by the County of Ventura for an equipment rental, sales, and leasing business. The modifi cation to permit is for the addition of a 15,000 SF building (to include 1,500 SF of office space and approximately 13,500 SF of equipment storage) with outside storage of approximately 37,500 SF.	MADRIGAL, DREW	654-2498	JAKRAN LLC
LU08-0088	7000150185		Santa Monica Mountains	08/04/2008	Planned Development	INCMPLTE	Planned Development Permit (PD) for one principal dwelling unit, one second dwelling units and four accessory structures (art studio, two storage structures, one pool house)	D'ANNA, MICHELLE	654-2685	BLUEWAVE TRUST 1-2-9
LU08-0089	0600400185	3902 PACIFIC COAST HWY	North Coast	08/07/2008	Planned Development	PROCESS	The project is a request to demolish the existing single family dwelling and replace it with the construction of a two story 1,820 square foot (first floor footprint) single family dwelling with attached parking. This project also includes the construction of a proposed stone terrace at the rear of the property and a spa. Variance LU 07-0083 approved for a reduction in front yard setback to 5' to accomodate the demolition of the existing residence and construction of a new residence, as proposed above. The parcel is zoned "R-B, 3,000 SF", (Residential Beach- 3,000 SF) and has a General Plan Designation of Existing Community. tHe project is also under the jurisdiction of the Coastal Zonine Ordinance and the Coastal Area Plan.	ROODSARI, KRISTINA	654-2467	KAA DESIGN GROUP
LU08-0090	0320201215	655 BURNHAM RD	Ojai Area	08/08/2008	Minor Modification	PROCESS	Time extension to CUP 3929, construction of additional recreational builidngs and dwellings	MALIN, CRAIG	654-2488	FOREST HOME INC

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LU08-0095	1280022115	1449 LOS ANGELES AV	Saticoy Area	08/12/2008	Conditional Use Permit	PROCESS	The project consists of an application for a Parcel Map Waiver-Merger w/ CC of C conditions as of 8/74 (SD08-0046) to legalize and merge two illegally created parcels into one legal lot, of 1.32 acres. The project also involves a Conditional Use Permit application for a Reuse Salvage Facility (w/ offices, restroom, wholesale and retail operations, warehouse, 4 moving van containers, 7 sea containers, and 6 canopy-covered storage areas) that includes a facility and yard that accepts and salvages household appliances, furniture, and building materials including wholesale and retail sales of the salvaged appliances. Also, proposed is a Planned Development Permit application for the repair and reconditioning of electrical machinery use. No new buildings are proposed except for a new trash enclosure. All existing structures appear to be built in the 1950's, 1960's and 1970's. A new parking lot would be provided with 7 regular spaces, 1 handicapped space, 3 compact spaces and one 12' x 40' loading zone proposed. Access to the site would be provided by an existing 30 foot wide gated	DONER, NICOLE	654-5042	TEETSEL TED
LU08-0099	2060169170	1513 OCEAN DR	Channel Islands	08/19/2008	Minor Modification	PROCESS	Modifiy size of approved but not constructed single famliy dwelling approved with Planned Development Permit LU07-0106 from 4,049 to 3,627 sq.ft.	D'ANNA, MICHELLE	654-2685	HOOVER R SCOTT
LU08-0100	0550060100		Piru Area	08/19/2008	Conditional Use Permit	INCMPLTE	Drill three test oil wells from two existing pads in Piru Oil Field - Modelo Area.	DONER, NICOLE	654-5042	ROCK ENERGY
LU08-0101	0330020405	11566 N VENTURA AV	Ojai Area	08/20/2008	Planned Development	INCMPLTE	New Planned Development Permit for a "Retail, Eating Establishment" to re-establish the use of existing class III restaurant. Previous permit PD-1457 expired 7/2001. ZV98-0102	LINDER, BECKY	654-2469	ZHENG SHWU-HUEY RAY
LU08-0103	0080160450	8310 BATES RD	North Coast	08/26/2008	Planned Development	PROCESS	Planned Development for grading over 50 cubic yards, being processed in conjunction with a Conditional Use Permit (LU07-0153) for two farmworker dwellings on a ten acre site.	OZDY, ANDREA	654-2453	KLINK JOHN M-PATRICIA D
LU08-0104	7000130095	9612 WELLS RD	Santa Monica Mountains	09/02/2008	Minor Modification	PROCESS	Minor Modification to reduce the size of a single family dwelling approved in Planned Development Permits LU 05-0001 and LU 07-0112 from 4,700 sq.ft. to 2,765 sq.ft.	D'ANNA, MICHELLE	654-2685	KREISLER ARI L-JILL S
LU08-0107	0350030315	8434 OJAI-SANTA PAULA RD	Ojai Area	09/11/2008	Conditional Use Permit	INCMPLTE	Request to construct a 7,200 square foot accessory hay barn on the lot. Existing structures on the property include a farm labor complex with covered porch; single family residence with attached garage and covered patio; a barn; pavillion; equipment barn and equipment carport. The site is zoned both Open Space, 20 acres minimum prcel size and Open Space, 40 acres minimum prcel size. The hay barn is located in the Open Space, 20 acre portion of the parcel. The proposed project is a CUP for accessory structures that in total with the existing accessory structures create more than 20,000 SF of agricultural accessory structures. the project has been deemed categoricall exempt from CEQA pursuant to Class 3.	ROODSARI, KRISTINA	654-2467	GILLELAND RICHARD A-

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LU08-0109	6940140065	1753 HIDDEN VALLEY RD	Lake Sherwood Area	09/15/2008	Minor Modification	INCMPLTE	Existing Conditional Use Permit (CUP) No. 5047 includes four farmworker dwelling units (FWDUs), two each on "Twin Acres Ranch" (APN 694-0-140-065) and "Comancias Ranch" (APN 694-0-160-130). Minor Modification No. LU08-0109 to CUP 5047 proposes a time extension and boundary reduction to include only "Twin Acres Ranch." The two FWDUs within the area to be removed from the CUP area ("Comancias Ranch") will be permitted with a zoning clearance only, as they are eligible for a ministerial permit. The proposal includes a request for a 10-year time extension to CUP 5047 on "Twin Acres Ranch," with a new expiration date of October 21, 2019.	OZDY, ANDREA	654-2453	SALICK BERNARD
LU08-0111	6940160030	1515 HIDDEN VALLEY RD	Lake Sherwood Area	09/16/2008	Minor Modification	INCMPLTE	Minor Modification to Conditional Use Permit LU 04-25 per Sections 8105-4 and 8107-26 to legalize two existing animal caretaker dwellings on the second floor of an existing storage building to partially abate Planning violation ZV02-176. The Modification request also includes the legalizaton of an existing horse excercisor and the inclusion of temporary storage during construction of the animal caretaker dwellings.	ROODSARI, KRISTINA	654-2467	HARTENSTEIN EDDY-CATHERINE
LU08-0113	1280040210	1905 LIRIO AV	Saticoy Area	09/18/2008	Variance	INCMPLTE	Variance to increase height of outdoor storage of recycled materials beyond the amount permitted by the Ventura County Non-Coastal Zoning Ordinance..	MADRIGAL, DREW	654-2498	MJL INVESTMENTS
LU08-0114	1280040210	1905 LIRIO AV	Saticoy Area	09/18/2008	Minor Modification	INCMPLTE	Minor Modification to Condition 8 of PD 1845 to increase height of outdoor storage of recycled materials	MADRIGAL, DREW	654-2498	MJL INVESTMENTS
LU08-0115	0410300200	3117 W TELEGRAPH RD	Fillmore Area	09/19/2008	Conditional Use Permit	PROCESS	Outdoor weddings, receptions and picnics (Festivals animal shows, and similar events, temporary outdoor)	BRUNSKY, HOLLEE		M V P PROPERTIES
LU08-0116	6150080205	5141 TAPO CANYON RD	N Simi Hills	09/24/2008	Minor Modification	PROCESS	Minor Modification for a time extension to Conditional Use Permit No. 4609, approved for sand and gravel surface mining.	MADRIGAL, DREW	654-2498	BROOKS WILLIAM C-JUANITA TR
LU08-0117	2180030040	2797 E PLEASANT VALLEY	Oxnard Plain	10/01/2008	Minor Modification	PROCESS	Minor Modification to Conditional Use Permit No. 5252 for the drilling of ten (10) additional wells for a total of 15 wells. The size of the drilling pad will not change. Permit for oil drilling and production.	LINDER, BECKY	654-2469	RENAISSANCE PETROLEUM
LU08-0118	1330031090	262 MONTGOMERY AV	El Rio Area	10/06/2008	Conditional Use Permit	PROCESS	New Conditional Use Permit for a 1,607 caretaker dwelling at an existing self-storage facility located at 262 Montgomery Avenue. Caretaker dwelling was constructed under CUP 4407 which has expired. Storage facility permittted under PD-1163.	LINDER, BECKY	654-2469	MARGUS LIMITED
LU08-0126	0310120190	18 VALLEY RD	Ojai Area	10/29/2008	Minor Modification	PROCESS	Minor Modification for a time extension for continued operation to CUP No. 3883 for an existing community center located at 18 Valley Road in the community of Oak View	DONER, NICOLE	654-5042	VENTURA COUNTY OF
LU08-0127	7000260125	42505 PACIFIC COAST HIGHWAY	S Coast Area	10/31/2008	Minor Modification	INCMPLTE	10 year renewal of Planned Development Permit No. 745, plus construction of covered patio, storage area, parking, water tank, walls, landscaping, and gate at existing Neptune's Net restaurant located at 42505 Pacific Coast Highway in Malibu.	MADRIGAL, DREW	654-2498	MICHELLE LEE
LU08-0128	6850207535	4997 KILBURN CT	Oak Park Area	11/03/2008	Conditional Use Permit	PROCESS	Construction of a wireless communication facility consisting of two 50' monopoles with three panel antennas each, located on the northwest and southeast side of an existing hilltop water tank. The pole on the southeast side is located in a 305 sq.ft. leased area with: six equipment cabinets, transformer, PPC and Telco cabinets, GPA antenna surrounded by a retaining wall and 6' chainlink fence. Installation of the equipment will require removal of two trees. The site contains six existing antennas and whip antennas for other wireless carriers.	MALIN, CRAIG	654-2488	OMNIPOINT COMMUNICATIONS
LU08-0131	2060156270	1113 OCEAN DR	Channel Islands	11/06/2008	Planned Development	INCMPLTE	Remodel and 174 sq.ft. expansion of an existing 2,374 sq.ft. three floor single family dwelling located at 1113 Ocean Drive in Silver Strand.	ROODSARI, KRISTINA	654-2467	KLUGER ARCHITECTS

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LU08-0132	0600440275	5446 RINCON BEACH PARK DR	North Coast	11/19/2008	Minor Modification	INCMPLTE	Existing single family dwelling located at 5446 Rincon Beach Park Drive in Seacliff. Minor Modification request Planned Development No. PD 1323 to convert existing garage in to fourth bedroom, convert portion of carport into entry and construct a new two car garage. Increase in size dwelling from 1,970 to 2,061 sq.ft. increase size of garage area from 222 to 387 sq.ft. Permit requested to abate violation no. V99-389 and replaces Site Plan Adjustment No. LU08-0098 which was not processed and closed..	OZDY, ANDREA	654-2453	NAPPI DOMINIC-TIARA
LU08-0133	6680080160	2701 WHITE STALLION RD	Thousand Oaks Area	11/20/2008	Planned Development	PROCESS	Conditional Use Permit No. LU08-0134 for grading in excess of 1,000 sq.ft. to abate Violation No. UN-0790. In addition, Planned Development Permit No. LU08-0133 filed for construction of second dwelling, animal caretaker dwelling, patio, two pump houses, gazebo, retaining walls, trellis, greenhouse, shed, two footbridges, gatehouse, barn and a garage. 24.62 acre site is located at 2701 White Stallion Road in Hidden Valley and is zoned OS-20ac/SRP.	ROODSARI, KRISTINA	654-2467	LARRY BRISLEY
LU08-0134	6680080160	2701 WHITE STALLION RD	Thousand Oaks Area	11/20/2008	Conditional Use Permit	PROCESS	Conditional Use Permit No. LU08-0134 for grading in excess of 1,000 sq.ft. to abate Violation No. UN-0790. In addition, Planned Development Permit No. LU08-0134 filed for construction of a second dwelling, animal caretaker, two pump houses, gaxebo, retaining walls, trellis, greenhouse, shed, two footbridges, gatehouse, barn and a garage. 24.62 acre site is located at 2701 White Stallion Road in Hidden Valley and is zoned OS-20ac/SRP.	ROODSARI, KRISTINA	654-2467	LARRY BRISLEY
LU08-0139	0330320085	35 ALTO DR	Ojai Area	12/01/2008	Planned Development	PROCESS	Planned Development Permit for construction of a 498 sq.ft. room addition to an existing 2.950 sq. ft. (of floor space), two-story, single family dwelling in a RA-1 acre/SRP (Scenic Resource Protection Overlay) zone located at 35 Alto Dr. in Oak View.	ANTHONY, CHUCK	650-4059	ROMAN RAUL
LU08-0143	0600030040	10151 OCEAN VIEW RD	North Coast	12/16/2008	Conditional Use Permit	PROCESS	Conditional Use Permit for an existing telecommunication facility consisting of a 50' tower with 2 microwave antenna dishes and an onmidirectional antenna, a 121 sq.ft. equipment building on a 900 sq.ft. lease area enclosed by an 8' chainlink fence. Site is located approximately 8,400' northeast of La Conchita on Rincon Peak Mountain. Permit is to replace expired Conditional Use Permit No. 4496. Project site called Rincon Peak.	MALIN, CRAIG	654-2488	VERIZON CALIFORNIA
LU08-0146	6850051080	100 BLACK CANYON RD	S Simi Hills	12/19/2008	Minor Modification	PROCESS	Application for a Minor Modification to Conditional Use Permit No. 248 for the construction of engineered natural treatment systems (ENTS) facilities within the two drainage areas of the Santa Susana Field Laboratory's Outfalls 008 and 009 watersheds. The ENTS facilities consist of rock check dams, detention basins, bioswales, and bioretention areas to capture and treat stormwater runoff.	DONER, NICOLE	654-5042	BOEING COMPANY
LU08-0147	6950110020	2095 TRENTHAM RD	Lake Sherwood Area	12/22/2008	Planned Development	SUBMITED	Planned Development Permit for construction of a structure over 2' jin height in an overlay zone. specifically a 420 sq.ft. detached two car garage on a 12,201 sq.ft. parcel located at 2095 Trentham Rd in Lake Sherwood. Parcel contains a 2,182 sq.ft. single family dwelling and is zoned RE-1ac/SRP (Rural Exclusive, one acre lot with a Scenic Resource Protection overlay).	BRUNSKY, HOLLEE	0	LUSKIN BERNARD J-TONI T
LU4171	5000090195		Las Posas Valley	08/10/1998	Conditional Use Permit	PROCESS	SAND AND GRAVEL QUARRY APNS: 500-0-050-41 500-0-090-19, 20, 21, 22. APPLICATION FOR A TIME EXTENSION FROM 2000 TO 2025, INCREASE IN TRUCK TRAFFIC FROM 460 ADT TO 656 ADT. ALSO COMBINES CUP 4171 WITH CUP 3451 (AN ADJACENT SMALL DECORATIVE ROCK QUARRY) INTO ONE PERMIT. EIR IN PROCESS.	ELLISON, SCOTT	654-2495	MORT MONTAZERI

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LU4571	5000100055		Las Posas Valley	10/20/1993	Conditional Use Permit	PROCESS	APPLICATION FOR A PERMIT TIME EXTENSION FROM 2012 TO 2025, INCREASE IN TRUCK TRAFFIC FROM 72 ADT TO 460 ADT. EIR IN PROCESS. SAND & GRAVEL MOD 1 OFFICE 1/28/97 MOD 2 EXTENSION APPR 9/5/95 MOD 3 MINING SAND & GRAVEL NOTES: 03/27/98 MOD OF PHASE RELATED CONDITION LANGUAGE 07-17-92 APPEAL 314 MOD 1 APPROVED 09/29/94. MODS 4 AND 5 RELATED TO TIMING AND CONSTRUCTION OF ACCESS ROAD.	ELLISON, SCOTT	654-2495	WAYNE JONES QUALITY ROCK
LU4874	5000050135		Los Posas Valley Area	09/26/1994	Conditional Use Permit	PROCESS	APNs: 500-0-050-13 500-0-090-02 Grimes Rock aggregate mine located at the base on Grimes Grade (SR-23 4 miles south of Fillmore). Application is for a time extension from 2013 to 2025, increase in truck traffic from 300 ADT to 460 ADT, elimination of truck route limitations.	ELLISON, SCOTT	654-2495	GRIMES ROCK
LU5265	0900190165	1025 MISSION ROCK RD	Mission Rock Rd	08/13/2002	Conditional Use Permit	PROCESS	The proposed project is separated into two distinct permits: a. PD-1943: a request for a new Planned Development Permit to legalize an existing Recreational Vehicle Storage Facility which includes the following existing uses and structures: eight (8) existing metal storage containers (8 ft. x 40 ft. each) and ten (10) existing storage vans (8 ft x 40 ft each); two existing offices (a 688 sq. ft. modular office trailer and a 1,800 sq. ft. office); one existing 6,000 gallon septic holding tank;, one existing 4,800 sq. ft. shop and storage building, 417 existing RV storage parking spaces, and a landscape de-silting area for surface runoff and collection and; b. CUP-5265: a request for a new Conditional Use Permit to legalize the construction of an existing 960 sq. ft. caretakers unit for added on-site security with an existing septic tank	LINDER, BECKY	662-6519	DEL STINES
LU5319	5110190225		Moorpark Area	08/04/2003	Conditional Use Permit	PROCESS	Request for a Conditional Use Permit to establish an existing "Large Scale" Organics Processing Facility , Soil Amendment, and Fire Wood Operation and storage building.	LINDER, BECKY	662-6519	PEACH HILL SOILS
SD04-0070	1530130135	103 ALOSTA DR	Camarillo Heights	12/08/2004	Parcel Map	INCMPLTE	The proposed project consists of a General Plan Amendment, Zone Change, and Tract Map in order to subdivide an approximately 3.21-acre lot into seven lots. The proposed General Plan Amendment and Zone Change would change the Camarillo Heights Existing Community land use and zoning designation of "RE-20,000 sq ft" (Residential Exclusive, 20,000 square feet minimum lot size) to "RE-13,000 sq ft" (Residential Exclusive, 13,000 square feet minimum lot size). The proposed Tract Map would subdivide the 3.21-acre lot into seven lots that would range between 13,076 net square feet (s.f.) and 23,700 net s.f. in size. The proposed project would include approximately 10,000 cubic yards (c.y.) of grading (5,000 c.y. of cut and 5,000 c.y. of fill) of grading to construct the building pads, driveways, and drainage features for future residential development on the proposed lots. The proposed project includes the construction of approximately 100 linear feet of new drainage swales/culverts, and 10 avocado trees would be removed to accommodate the	KLEMANN, DAN	654-3588	PENGILLEY JEFF R-KAR
SD05-0031	6450020020		Santa Susana Area	05/09/2005	Tract Map	PROCESS	Six lot subdivision of a 1.58 acre parcel in Santa Susanna Knolls.	ELLISON, SCOTT	654-2495	KOYSHMAN YAKOV

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SD05-0035	0380020045		Ojai Area	05/24/2005	Parcel Map	PROCESS	lCreation of 34 single family lots, ranging in size from approximately 40 to 160 acres. Project is consistent with existing on-site zoning and General Plan designations. Water to be limited to existing agricultural allocation (275 afy) plus 50 afy domestic water from the City of Santa Paula. Home sites limited to 3-4 acre building pads surrounded by 200-foot fire fuel modification zone.	FRANCIS, NANCY	654-2461	ADAMS CANYON RANCH
SD05-0037	0100193055	832 OSO RD	Ojai Area	05/31/2005	Parcel Map	INCMPLTE	SUBDIVISION OF A 4.68 ACRE PARCEL INTO 2 LOTS, APPROXIMATELY 2.3 AND 2.2 ACRES IN SIZE. CURRENTLY THE ONSITE USES DO NOT CONFORM TO ZONING, WITH 3 DWELLING UNITS LOCATED ON THE ONE PARCEL. AS DESIGNED, THE SUBDIVISION WOULD LOCATE ONE PRINCIPLE RESIDENCE ON EACH LOT, RESULTING IN ZONING CONFORMANCE. THE PARCEL IS ZONED RA-2 AC AND IS DESIGNATED RR-2 ON THE OJAI AREA PLAN. A NUMBER OF ACCESSORY STRUCTURES ARE ALSO LOCATED ON THE PROPERTY.	MORRISSET, DEBBIE	654-3635	RADCHENKO VLADLEN-GL
SD06-0008	1530150055	252 ALOSTA DR	Camarillo Heights	02/23/2006	Parcel Map	INCMPLTE	The proposed project consists of the subdivision of an approximately 23,063 square feet (s.f.) gross lot into two lots, as follows: Lot 1-11,337.29 s.f. gross (10,017.49 s.f. net) and Lot 2-11,725.71 s.f. gross (10,210.71 s.f. net). The subject lot is currently developed with a single family dwelling, attached garage, detached garage, second dwelling unit, recreation accessory building, and two private septic systems. The proposed project includes the demolition of the detached garage, the construction of a new detached garage on Lot 2, and the conversion of the recreational accessory building into the primary residence on Lot 2. The conversion of the recreational accessory building into the primary residence would require the installation of a shower in the existing bathroom, as well as the installation of a 220-V circuit, cooking range, and sink with a garbage disposal in order to create a kitchen. Water would be provided by the Pleasant Valley Mutual Water Company. Sewage disposal for the two lots would be provided by the Camarillo Sanitary District. The applicant is proposing to install approximately 1,800 feet of sewer main that would extend	ANTHONY, CHUCK	650-4059	DECASTRO ALEXANDER E
SD06-0033	5200180230	10490 SANTA ROSA RD	Santa Rosa Valley	06/29/2006	Tract Map	PROCESS	The proposed project consists of a rezone and a subdivision of an approximately 133.2 acre lot, located at 10490 Santa Rosa Road in the Santa Rosa Valley. The proposed project includes a subdivision of the lot into 18 residential lots and a rezone of a portion of the lot from "AE-40 ac" (Agricultural Exclusive, 40 acre minimum lot size) to "RE-2 ac" (Residential Exclusive, two acre minimum lot size). Proposed Lots 1-16 would be subject to the proposed "RE-2 ac" zoning designation and would range between 2.15 and 4.25 acres (net) in size. Proposed Lot 17 would be 40.16 acres (net and gross) in size and proposed Lot 18 would be 40.09 acres (net and gross) in size; Lot 17 and 18 would continue to be subject to the "AE-40 ac" zoning designation. The proposed lots are designed to accommodate future residential development, which would be developed by individual property owners. The applicant is proposing to allow a limited number of horses on some of the proposed lots, pursuant to the findings of a nitrate impact study that was prepared for the proposed project. The maximum number of horses that are proposed for each lot is as fo	D'ANNA, MICHELLE	654-2685	WILDWOOD STABLE ESTATES ,LP

Pending Projects include CUP's, PD's, Major Mods, Minor Mods, Variances, Subdivisions, General Plan Amendments and Zone Changes that have a status of submitted, in process or incomplete.
Source: Permits Plus Tracking System, December 2008.

County of Ventura, Resource Management Agency, Planning Division

Pending Projects List- December 2008

Permit Number	Parcel No.	Address	Location	Date Filed	Permit Type	Status	Permit Description	Case Planner	Case Planner Phone	Applicant
SD07-0011	6460180050		Santa Susana Area	02/22/2007	Parcel Map	INCMPLTE	This project is to subdivide an existing lot into two parcels. Parcel 1 - 12,077 sf net and Parcel 2 - 12,038 sf net, both lots are vacant. The project, as proposed, will create an entitlement for generating additional traffic. The previous PM 4719 , a 2 lot subdivision, was approved on 09-21-1990 and was never recorded and expired on 9-21-1995.	MORRISSET, DEBBIE	654-3635	ALFONSO HERNANDEZ
SD07-0013	0630050360	5301 N VENTURA AV	N Ventura Ave	03/07/2007	Parcel Map	PROCESS	Proposed Parcel Map to create 6 parcels at an existing studio and professional school (Brooks Institute) for film and photography. Concurrently, the applicant is applying for a zone change from "M3-10,000 sq.ft." to "M2-10,000 sq.ft," a zone text amendment to allow professional schools in the "M2-10,000 sq.ft." zone, and a major modification to CUP 4985 for the expansion of the Brooks Institute. Required parking for all parcels combined is proposed to be designated on the various proposed parcels, along with easements shared among all parcels.	ANTHONY, CHUCK	650-4059	RDKJV CAMPUS, LLC
SD07-0018	0600380030	3945 PACIFIC COAST HWY	North Coast	04/04/2007	Parcel Map	INCMPLTE	2 lot subdivision of a 272 acre parcel to create a 252 acre parcel north of the Pacific Coast Highway and a 20.3 acre parcel souh of the Pacific Coast Highway at 3945 W. Pacific Coast Highway, Ventura.	MORRISSET, DEBBIE	654-3635	FARIA FAM PART LTD R
SD07-0029	1520131125	250 AVOCADO PL	Las Posas Estates	05/23/2007	Parcel Map	INCMPLTE	2 lot subdivision, create two one acre parcels on Avocado Place in Camarillo. Additional information is required for completeness. The area used for the Flood Control District easement shall be deducted from the gross lot area if the property owner is prohibited from using the surface of the land. This qualification may reduce the lot areas to a less than conforming lot size making the lot too small to be divided.	MORRISSET, DEBBIE	654-3635	BOLDRIN GLENN A-ELFRIEDE H TR
SD07-0045	0170040050	211 N LALUNA AV	Ojai Area	08/28/2007	Parcel Map	PROCESS	2-Lot Parcel Map to subdivide a five acre lot, resulting in Parcel "1" (1.15 acre) & Parcel "2" (3.92 acres).	OZDY, ANDREA	654-2453	CORNEJO NATALIO-MARIA G
SD07-0057	0630220065	3486 N VENTURA AV	N Ventura Ave	10/29/2007	Parcel Map	INCMPLTE	4 lot Parcel Map subdividing one parcel into four 1+ acre parcels.	DONER, NICOLE	654-5042	SISU PROPERTIES LLC
SD07-0064	1630010125	3250 SOMIS RD	Somis Area	11/14/2007	Parcel Map	PROCESS	Tentative Parcel Map to create three lots, ranging between .94 acres and 2.46 acres with a designated remainder of 15.08 acres for the UPRR. This project also includes APN 163-0-010-115 and 125.	DONER, NICOLE	654-5042	BURDULLIS JOSEPH-COR
SD08-0004	6580060475	311 SILAS LN	Thousand Oaks Area	02/11/2008	Parcel Map	PROCESS	The proposal is for a two-lot subdivision pursuant to Tentative Parcel Map 5777.	D'ANNA, MICHELLE	654-2685	BARR JOEL M-VIOLA A TR
SD08-0006	1450180075	2557 CORTEZ ST	El Rio Area	02/14/2008	Parcel Map	PROCESS	industrial condo parcel map approval by processed with the construction of two industrial condo buildings under VCZO Matrix: "Manufacturing Industries" uses with a Planned Development Permit only apporved by Planning Director.	LINDER, BECKY	654-2469	SLR OXNARD INV LLC
SD08-0020	1090390060		Saticoy Area	05/12/2008	Parcel Map	PROCESS	Large lot Parcel Map to create five 40+ acre lots	OZDY, ANDREA	654-2453	PL-B RANCH ET AL
SD08-0042	1090390010	2317 LOS ANGELES AV	Saticoy Area	07/21/2008	Parcel Map	INCMPLTE	Request to subdivide 340 acres into 5 separate parcels. Each new parcel in the parcel map will be subdivided as follows: Parcel 1 to 43.28 acres; Parcel 2 to 48.42 acres; Parcel 3 to 44.25 acres; Parcel 4 to 40.56 acres and Parcel 5 to 163.61 acres. The request also involves a Zone Change of Parcel 4; which will re-zone the northwest half of the proposed parcel from "OS-160 ac" (Open Space, 160 acre minimum parcel size) and "OS-80 ac" (Open Space, 80 acre minimum lot size) to ""AE-40 ac" (Agricultural Exclusive, 40 acre minimum parcel size). There are several existing structures, but no new structures are proposed with this project. There are also active LCA contracts on APNs 030 & 040.	ROODSARI, KRISTINA	654-2467	JENSEN DESIGN

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County of Ventura, Resource Management Agency, Planning Division

Pending Projects List- December 2008

Permit Number	Parcel No.	Address	Location	Date Filed	Permit Type	Status	Permit Description	Case Planner	Case Planner Phone	Applicant
SD08-0043	1090390080		Saticoy Area	07/21/2008	Tract Map	INCMPLTE	The applicant requests a subdivision of 125.6 acres into five legal parcels. Three parcels will be minimum 40 acres each within the existing A-E zone. One parcel will be minimum 2 acres and applicant requests a zone change from RE-10 acre minimum to RE-2 acre minimum. One parcel will be one acre minimum within the existing RE-1 acre minimum zone. Three rescission/re-entry LCA contracts will be processed concurrently on the A-E zoned parcels.	ANTHONY, CHUCK	650-4059	SHANE L BUTLER GROWERS LLC
SD4410	5500030020		Santa Rosa Valley	04/21/2008	Tract Map	PROCESS	Request to subdivide five (5) legal lots totalling approximate 50.0 acres into fifteen (15) parcels for future residential construction. The project is located north of Santa Rosa Road at the terminus of Yucca Drive in the community of Santa Rosa Valley.	SCOLES, KELLY		CAPITAL GUIDANCE INC.
ZN05-0009	0630050360	5301 N VENTURA AV	N Ventura Ave	07/19/2005	Zone Change	PROCESS	BROOKS SCHOOL EXPANSION: Applicant is applying for a zone change (ZN05-0009) from "M3-10,000 sq.ft." to "M2-10,000 sq.ft." In addition, three other major components are included. A Zone Text Amendment (ZN07-0001)to allow professional schools in the M2 zone with a Conditional Use Permit. Also, a Modification to CUP 4985 to add a total of 68,210 sq.ft. of structures to the existing studio and professional school (Brooks Institute) for film and photography. The project includes an increase in number of students (~1000 to ~2000) and faculty (~152 to ~200), and the addition of 22 acres to the CUP boundary to support a total of 627 parking spaces. Also, applicant has submitted a Parcel Map (SD07-0013) to reconfigure existing lot lines within the CUP boundary to create 6 parcels at the existing studio and professional school (Brooks Institute) for film and photography.	ANTHONY, CHUCK	650-4059	HOLLYWOOD WEST LLC
ZN05-0010	0000000000	999 POTRERO RD		08/18/2005	Zoning Ordinance Amendment	PROCESS	Conservation parcel amendments to Non-Coastal and Subdivision Ordinances, to allow creation of parcels that are below the minimum lot size requirement, when one of the parcels created will be transferred to a Conservation Organization. Project is linked to GP05-0003.	MILLAIS, DEBORAH	654-5037	COUNTY OF VENTURA
ZN05-0012	6450160020		Santa Susana Area	11/07/2005	Zone Change	PROCESS	The proposed project consists of a General Plan Amendment, Zone Change, and Conditional Use Permit in order to develop a leasehold manufactured housing community on the project site. The proposed General Plan Amendment and Zone Change would change the existing land use/zoning designations of Existing Community - "RE-1 ac" (Rural Exclusive, one acre minimum lot size), "RE-20,000 sq ft" (Rural Exclusive, 20,000 square feet minimum lot size), and "RE-5 ac" (Rural Exclusive, five acre minimum lot size), to Existing Community - "RPD-5.14 du/ac" (Residential Planned Development, 5.14 dwelling units/acre). The applicant is proposing to develop only 100 dwelling units on the project site. The dwelling units would consist of nine, two-story manufactured homes and 91 one-story manufactured homes, ranging between 813.3 square feet (s.f.) and 1,344 s.f. in size. The manufactured homes would be delivered and installed within each homesite upon purchase of the home and execution of a lease agreement with the community management agency. The applicant is proposing 10 (10%) of the dwelling units as afford	KLEMANN, DAN	654-3588	COLTON LEE COMMUNITIES, LLC

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County of Ventura, Resource Management Agency, Planning Division

Pending Projects List- December 2008

Permit Number	Parcel No.	Address	Location	Date Filed	Permit Type	Status	Permit Description	Case Planner	Case Planner Phone	Applicant
ZN06-0005	5200180230	10490 SANTA ROSA RD	Santa Rosa Valley	06/29/2006	Zone Change	PROCESS	The proposed project consists of a rezone and a subdivision of an approximately 133.2 acre lot, located at 10490 Santa Rosa Road in the Santa Rosa Valley. The proposed project includes a subdivision of the lot into 18 residential lots and a rezone of a portion of the lot from "AE-40 ac" (Agricultural Exclusive, 40 acre minimum lot size) to "RE-2 ac" (Residential Exclusive, two acre minimum lot size). Proposed Lots 1-16 would be subject to the proposed "RE-2 ac" zoning designation and would range between 2.15 and 4.25 acres (net) in size. Proposed Lot 17 would be 40.16 acres (net and gross) in size and proposed Lot 18 would be 40.09 acres (net and gross) in size; Lot 17 and 18 would continue to be subject to the "AE-40 ac" zoning designation. The proposed lots are designed to accommodate future residential development, which would be developed by individual property owners. The applicant is proposing to allow a limited number of horses on some of the proposed lots, pursuant to the findings of a nitrate impact study that was prepared for the proposed project. The maximum number of horses that are proposed for each lot is as fo	KLEMANN, DAN	654-3588	WILDWOOD STABLE ESTATES, LP
ZN07-0001	0630050360	5301 N VENTURA AV	N Ventura Ave	03/08/2007	Zoning Ordinance Amendment	PROCESS	BROOKS SCHOOL EXPANSION: Zone Text Amendment to allow professional schools in the M2 zone with a Conditional Use Permit. The other components of the project include the following: Modification to CUP 4985 to add a total of 68,210 sq.ft. of structures to the existing studio and professional school (Brooks Institute) for film and photography. The project includes an increase in number of students (~1000 to ~2000) and faculty (~152 to ~200), and the addition of 22 acres to the CUP boundary to support a total of 627 parking spaces. Also, the applicant is applying for a zone change from "M3-10,000 sq.ft." to "M2-10,000 sq.ft." Also, applicant has submitted a Parcel Map (SD07-0013) to reconfigure existing lot lines within the CUP boundary to create 6 parcels at the existing studio and professional school (Brooks Institute) for film and photography.	ANTHONY, CHUCK	650-4059	HOLLYWOOD WEST LLC
ZN07-0006	1530130135	103 ALOSTA DR	Camarillo Heights	07/30/2007	Zone Change	INCMPLTE	The proposed project consists of a General Plan Amendment, Zone Change, and Tract Map in order to subdivide an approximately 3.21-acre lot into seven lots. The proposed General Plan Amendment and Zone Change would change the Camarillo Heights Existing Community land use and zoning designation of "RE-20,000 sq ft" (Residential Exclusive, 20,000 square feet minimum lot size) to "RE-13,000 sq ft" (Residential Exclusive, 13,000 square feet minimum lot size). The proposed Tract Map would subdivide the 3.21-acre lot into seven lots that would range between 13,076 net square feet (s.f.) and 23,700 net s.f. in size. The proposed project would include approximately 10,000 cubic yards (c.y.) of grading (5,000 c.y. of cut and 5,000 c.y. of fill) of grading to construct the building pads, driveways, and drainage features for future residential development on the proposed lots. The proposed project includes the construction of approximately 100 linear feet of new drainage swales/culverts, and 10 avocado trees would be removed to accommodate the	KLEMANN, DAN	654-3588	PENGILLEY JEFF R-KAROLINA
ZN07-0007	5000393415	15578 LAPEYRE RD	Tierra Rejada Valley	11/21/2007	Zone Change	PROCESS	In order to facilitate the Parcel Map Waiver Lot Line Adjustment SD07-0067, the applicant is required to change the zoning between the two lots from OS 10acre and OS 40acre to OS 40acre and OS 10acre. This is due to the fact that the portions being adjusted are in different zones and the adjustment and zone change will not reduce the aggregate area of each zone.	DONER, NICOLE	654-5042	RUBY RANCH LLC
ZN08-0009	1090390010	2317 LOS ANGELES AV	Saticoy Area	07/21/2008	Zone Change	PROCESS	Zone change in conjunction with Parcel Map SD08-0042 to change the zoning of the northwest portion of parcel 4 from OS-160AC and OS-80 AC to AE-40 AC. Project is in Conjunction with LCA 08-0005.	ROODSARI, KRISTINA	654-2467	LLOYD-BUTLER THOMAS-

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County of Ventura, Resource Management Agency, Planning Division

Recently Approved Projects List- December 2008

Permit Number	Parcel No.	Address	Location	Date Filed	Permit Type	Date Approved	Permit Description	Case Planner	Case Planner Phone	Applicant Name
GP07-0002	0000000000			04/20/2007	General Plan Amendment	07/22/2008	Housing Element Update - An Update to the Land Use Appendix and Goals, Policies, and Programs of the General Plan. Covers period of January 1, 2006 through June 30, 2014.	SUSSMAN, SHELLEY	654-2493	
LU05-0066	0180200105	65 BALDWIN RD	Ojai Area	05/10/2005	Conditional Use Permit	12/15/2008	The proposed project consists of a request for a Conditional Use Permit to allow existing, unpermitted auto repair and auto sales activities to continue on-site. [The Conditional Use Permit (CUP 4583) for the existing uses on-site expired on March 12, 2000.] More specifically, the applicant is requesting a Conditional Use Permit to allow the following uses: (1) repair and reconditioning services for auto repair, including component repair (painting or body work, auto salvage, or dead storage of vehicles are not included); and, (2) retail trade including motor vehicle sales (i.e., used auto sales). The proposed project would include the storage of lubricants for auto servicing and the removal of an existing pole sign. The proposed project would abate Zoning Violation Case No. ZV04-0024 for auto dismantling (salvage) activity and dead storage of vehicles on-site.	ROODSARI, KRISTINA	654-2467	GABRIELS LEONARDUS P
LU06-0101	5000410285	3530 SUNSET VALLEY RD	Tierra Rejada Valley	07/18/2006	Conditional Use Permit	07/25/2008	The project consists of an application for a Conditional Use Permit (CUP) to partially abate Zoning and Building Violation Case Nos. ZV 01-0029, and V01-000103. The CUP would allow "festivals, animal shows, and similar events, temporary outdoor" (VCNCZO, 2005, §8105-4) or, more specifically, wedding events on the property.	DONER, NICOLE	654-5042	CASSAR ROBERT H
LU06-0105	0600082405	6758 BREAKERS WY	North Coast	08/02/2006	Variance	10/10/2008	The proposed project consists of the construction of an approximately 133 square foot (s.f.) addition to an approximately 1,356 s.f. single family dwelling. The addition would enlarge a bedroom that was created by an illegal conversion of a garage to living space (i.e., a bedroom and bathroom). The existing single family dwelling is located approximately six feet from the front property line and does not comply with the 10-foot front yard setback requirement for this lot. Furthermore, two covered parking spaces are required for the residential use of the property, however no parking spaces exist on-site and no parking is proposed as a part of this project. Therefore, the applicant is requesting approval of a variance to allow the proposed addition and the continued use of the interior living space, without providing the two parking spaces that are required for the use of the single family dwelling. The single family dwelling with the proposed addition would be approximately 15.5' in height. The Casitas Municipal Water District would continue to provide water and the Ventura Regional Sanitation District would continue to provide sewage disposal for the r	DONER, NICOLE	654-5042	HIGH KEN
LU07-0022	0990110065	909 MISSION ROCK RD	Mission Rock Rd	02/26/2007	Planned Development	08/06/2008	This project request is for a minor modification to CUP-4204-7 to expand the CUP boundary (099-0-110-04, 7.43 Acres) by 5.7 acres for a total CUP boundary of 13.13 acres and for the construction of three new warehouse buildings each with an interior office to be used for Auto Recycling and Salvaged Auto Part Sales Facility. Each building will have its own septic system. Buildings to be placed on two legal lots approved in lot split on March 29, 2007. No new APN established yet by County Recorder. Shell Road is a private drive easement which crosses parcel 2. The proposed total building area is 15,300 SF (Building H - 7,500 SF, Building I - 4,800 SF, and Building K - 3,000 SF)	LINDER, BECKY	654-2469	CHARITY DEVELOPMENT LLC

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LU07-0070	6200320035	19 N MUSTANG LN	N Simi Hills	06/01/2007	Conditional Use Permit	10/10/2008	The applicant is requesting a new Conditional Use Permit for an existing wholesale plant propogation nursery, originally permitted under CUP 4626 (now expired). The project includes an existing on-site sales facility with proposed new bathroom facilities to be connected to a new septic system, approximately 25,625 square feet of new shade houses, and accessory structures. These accessory structures include 100 SF dual fuel tank pad, and a 3,000 SF equipment maintenance shed. Total lot coverage is 0.23% of the 51.4 acre parcel. The property is located North of Tapo Canyon Road and Bennett Road at 5000 Bennett Road, Simi Valley.	MADRIGAL, DREW	654-2498	KALU INVESTMENTS
LU07-0084	0170153250	246 W EL ROBLAR DR	Ojai Area	06/27/2007	Planned Development	10/10/2008	The applicant is requesting a new Conditional Use Permit for the conversion of an existing gas station's service bay into a 896 square feet mini mart. The permittee is proposing to provide 1,012 square feet of landscaping and to update the existing signs. The project site is a 10,000 square foot corner lot with a library located to the north of the site and residences to the east.	MADRIGAL, DREW	654-2498	SIDHU GURBACHAN S-SUMINDER K
LU07-0086	0900190315	999 MISSION ROCK RD	Mission Rock Rd	06/29/2007	Major Modification	07/24/2008	Granite Construction Company (Applicant) proposes to install and operate an asphalt mixing plant and recycling facility (Project), including the continuation of an existing storage of concrete utility vaults use in an existing industrial area of unincorporated Ventura County. The Applicant is proposing to modify the existing permit to extend its duration for twenty years and modify the project description to be consistent with the Applicant's planned improvements. The purpose and objective of the Modification to Conditional Use Permit No. 5147 is to produce up to 450,000 tons of asphaltic concrete (asphalt) per year and recycle approximately 300,000 tons per year of concrete and asphalt rubble for sale within the Ventura County market. The project will help balance the supply and demand for asphalt in Ventura County by increasing the County's ability to meet its current asphalt demand from 50 percent to 100 percent, reduce raw material imports from Los Angeles and Santa Barbara Counties, and helps keep waste out of Ventura County landfills.	MADRIGAL, DREW	654-2498	GRANITE CONSTRUCTION
LU07-0088	0160200155		Piru Area	07/03/2007	Major Modification	10/02/2008	Summary of Project Description: The proposed project is designed to increase the attractiveness of Lake Piru for recreational users. The primary emphasis is to: Upgrade existing facilities (e.g. day use areas, parking lots), Expand existing facilities (e.g. small bait shop expanded to a camp store, snack bar expanded to indoor restaurant) Add new facilities (e.g. swim lagoon, recreational building, group RV camping, sewage treatment plant) Convert virtually all existing camping spaces to full utility RV spaces. Currently 106 spaces have only electric hook-ups, and five spaces have full hook-ups. In addition, the applicant is requesting a 30-year time extension for the CUP. Currently the CUP expires on November 30, 2010. The proposed project would extend the permit site life to 2040.	NEWMAN, TERRY	654-3136	UNITED WATER CONS DI

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County of Ventura, Resource Management Agency, Planning Division

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LU07-0108	7000110275	11855 PACIFIC COAST HIGHWAY	South Coast	08/08/2007	Minor Modification	08/14/2008	A request by the Ventura County Fire Protection District to install, maintain and operate an unmanned communications monopole, consisting of the installation and operation of a fifty-five foot high tapered monopole with a twenty-foot whip antenna attached at the top, which brings the structure to a total of seventy-five feet in height. Four, 8-foot long whip antennas will be placed at a height of 32-feet on the pole; with the arm that holds the antennas extending 18 to 24-inches out in each direction. The monopole will be used for the fire station's emergency response and communications system, and located approximately 285 feet from Pacific Coast Highway on the east side of the parcel .	ROODSARI, KRISTINA	654-2467	VENTURA CO FIRE PROTECT DIST
LU07-0120	0300240045	11802 KOENIGSTEIN RD	Ojai Area	09/13/2007	Conditional Use Permit	09/08/2008	Applicant is requesting a time extension to Conditinal Use Permit No. 293, which expires in April 2008. Applicant is requesting to reduce size of existing CUP boundary and add one additional well and parcel this this CUP request; therefore the addition and nature of the request is large enough of a change to constitute the processing of a new CUP. Approximately 11 parcels and 13 wells are associated with this CUP request. Structures included in this CUP request include: a Quanset hut, office storage container, gas flaring units and a tank farm.	ROODSARI, KRISTINA	654-2467	DOUG OFF FOR OJAI OIL
LU07-0123	7000010425		Santa Monica Mountains Area	09/25/2007	Planned Development	12/08/2008	Construct a 3,375 sq.ft. single family dwelling and a 560 sq.ft. garage on an undeveloped 10 acre parcel.	D'ANNA, MICHELLE	654-2685	HEIN CURTIS
LU07-0128	2060243180	3553 OCEAN DR	Channel Islands	10/11/2007	Planned Development	09/04/2008	Demollish existing dwelling, construct new 3263 sq ft single family dwelling and 581 sq ft garage in the Coastal Zone.	D'ANNA, MICHELLE	654-2685	HOOVER R SCOTT
LU07-0131	0600410375	3798 PACIFIC COAST HWY	North Coast	10/18/2007	Planned Development	07/24/2008	Demolition of an existing single family dwelling and the construction of a new 4977 sq.ft. single family dwelling with a 664 sq.ft. garage, 118 sq.ft. of storage, and 1125 sq.ft. of balconies	OZDY, ANDREA	654-2453	WHITMAN, MARK ARCHITECTS
LU08-0014	2060241140	3600 OCEAN DR	Channel Islands	02/13/2008	Variance	09/05/2008	The proposed project consists of the demolition of the existing single family dwelling and construction of a new single family dwelling of 1,950 square feet, decking of 88 square feet and a two car garage of approximately 415 square feet (s.f.). The applicant is requesting an administrative variance to reduce the street side setback by one foot to four feet minimum to construct a new single family dwelling (SFD) and two car garage. The new SFD would be approximately 25' in height measured from the midpoint of the peak.	DONER, NICOLE	654-5042	MILBRANDT, ROY
LU08-0015	1450152030	2860 VINEYARD AV	El Rio Area	02/21/2008	Planned Development	07/28/2008	Demolition of the existing commercial building and the replacement of that structure with a 4,022 square foot multi use commercial building. The project site also includes the construction of two, 10-feet high concreted trash enclosures (enclosures include 6-foot high walls and two columns 4-feet in height that support the roof enclosure, bringing the height of the trash enclosure to a maximum of 10-feet) located at the rear of the property. The project is located on Veneyard Ave. and Jourdin Sts. in the unincorporated area of Oxnard. The project also fall under the El Rio MAC review jurisdiction and the City of Oxnard sphere of influence. The site is developed and zoned "CPD", (Commercial Planned Development); therefore there is expected to be little to no environmental impacts due to the introduction of this project into the area.	ROODSARI, KRISTINA	654-2467	MEHDIANI BRUCE
LU08-0023	0900010065	928 CUMMINGS RD	Santa Paula Area	03/10/2008	Conditional Use Permit	07/03/2008	Conditiona Use Permit for Limoneira to allow for temporary outdoor events, weddings and fund raisers at 1141 Cummings Road.	SCOLES, KELLY	654-2440	LIMONEIRA ASSOCIATES

Projects include CUP's, PD's, Major Mods, Minor Mods, Variances, Subdivisions, General Plan Amendments and Zone Changes that have been approved within the last 6 months.
Source: Permits Plus Tracking System, December 2008.

County of Ventura, Resource Management Agency, Planning Division

Recently Approved Projects List- December 2008

Permit Number	Parcel No.	Address	Location	Date Filed	Permit Type	Date Approved	Permit Description	Case Planner	Case Planner Phone	Applicant Name
LU08-0026	6680080100	2400 WHITE STALLION RD	Thousand Oaks Area	03/12/2008	Planned Development	10/10/2008	The proposed project consists of the replacement of an existing dwelling unit (Dwelling unit B), with the new construction of a one story detached accessory structure not for human habitation of approx. 2,000 square feet, a new individual septic system (sand filtration), and grading of more than 50 cubic yards of earth on a 20 acre lot in the Open Space-20ac/Scenic Resource Protection Overlay (OS20ac/SRP) zone. The new detached accessory structure to be used as a hobby room/artist studio would be setback more than 100 feet from the rear, side and front property lines and be approximately 25 feet in height measured from the midpoint of the peak to finished grade. Oak trees are located within, or immediately adjacent to, the project site, which might be subject to adverse impacts from the proposed grading and construction activities.	DONER, NICOLE	654-5042	BECKER, LOU
LU08-0028	0350230215	375 LOS CABOS LN	Ojai Area	03/19/2008	Minor Modification	09/30/2008	Change the designation on the existing 900 sq ft Farmworker Dwelling Unit to primary dwelling. Change the designation on the 1715 sq ft primary dwelling to a Farmworker Dwelling Unit designation.	ANTHONY, CHUCK	650-4059	ELDER LAWRENCE L-SALLIE J TR
LU08-0031	6680080100	2400 WHITE STALLION RD	Thousand Oaks Area	03/31/2008	Conditional Use Permit	10/10/2008	A CUP request for proposed grading of more than 50 cyd in SRP overlay zone for construction of an accessory structure over 2,000 square feet. Also, see LU08-0026.	DONER, NICOLE	654-5042	BECKER, LOU
LU08-0032	0900141125	11175 NARDO ST	Saticoy Area	04/07/2008	Minor Modification	09/03/2008	The project is the phased rebuild of structures destroyed or damaged by fire on a portion of the site. Phase 1 consists of re-building the original 4,640 SF building to an industrial condo, construct 6,745.2 SF industrial space from a portion of the existing 34,089 SF building "D", and retrofit the remaining 40,958SF of fire damaged building "A" into drive through ministorage . Phase 2 will consist of replacing the main fire damaged Packing House building "A" with a 59,733 SF new building add 2,053 SF to the existing 40,958 first floor , second floor is 42,919 SF, and the mezzanine will be 14,761.	MORRISSET, DEBBIE	654-3635	CA CLASSIC STORAGE SATICOY
LU08-0035	0290050080	783 MC NELL RD	Ojai Area	04/10/2008	Minor Modification	11/19/2008	Request to time extend the existing CUP (CUP 3245) for an additional 10-year period. Current CUP involves the operation of the site as a private school for pre-school to Grade 3 children. No new structures or uses are requested with the subject permit. RE-5 acres zoning.	ROODSARI, KRISTINA	654-2467	MONICA ROS SCHOOL
LU08-0061	7010020080	8406 MIPOLOMOL RD	Santa Monica Mountains Area	06/02/2008	Minor Modification	11/29/2008	Construct 700 sq.ft. workroom as a second stroy addition to an existing 1,449 sq.ft. garage.	D'ANNA, MICHELLE	654-2685	JENKINS THOMAS W-CON
ZN07-0005	0000000000			07/10/2007	Zoning Ordinance Amendment	09/09/2008	Request by the VC Wateshed Protection District to revise the non-coastal zoning ordiance to allow the WSPD to conduct public works maintenance in accordance with SMARA for more than one year. The request is to eliminate the one-year limitation of PW maintenance activities	ROODSARI, KRISTINA	654-2467	VC WATERSHED PROTECTION DISTRICT

Projects include CUP's, PD's, Major Mods, Minor Mods, Variances, Subdivisions, General Plan Amendments and Zone Changes that have been approved within the last 6 months.
Source: Permits Plus Tracking System, December 2008.

City of Ojai

BUILDING PERMITS ISSUED
NOVEMBER 2008

	APN	ISSUED		NO.			STREET NAME		ZONE	PERMIT	PROJECT DESCRIPTION	SQ FT	PATIO
1	021-0-011-030	11/03/08	ROGOVE	1119		N	SIGNAL	ST	R-O-1	7708	OUTDOOR B-B-Q		
2	022-0-120-010	11/04/08	CITY OF OJAI	510			PARK	RD	P-L	7720	REMODEL RESTROOMS		
3	022-0-012-060	11/04/08	GREENBERG	1112		N	SIGNAL	ST	R-O-1	5311	POOL	800	
4	021-0-074-050	11/10/08	WERBERGER	213	A	E	OAK	ST	VMU	7722	RE-ROOF		
5	017-0-305-095	11/10/08	LEE	206			LAREDO	LN	R-1	7723	ELECTRICAL		
6	022-0-012-450	11/10/08	MCPHERSON	1111		N	MONTGOMERY	ST	R-O	7701	PHOTO VOLTAIC		
7	021-0-102-110	11/10/08	KOHAN	302			EL PASEO	RD	C-1	7649	RE-ROOF		
8	023-0-030-130	11/12/08	ST ANDREWS	409			TOPA TOPA	DR	P-L	7724	SEWER LATERAL		
9	022-0-090-120	11/12/08	EARNEST	513			DROWN	AV	R-1	7725	RE-ROOF		
10	020-0-040-160	11/18/08	MURPHY	710			FOOTHILL	RD	R-O-1	7726	A/C		
11	019-0-110-335	11/19/08	OJAI HOSPITAL	1306			MARICOPA	HWY	I-R-1	7728	TRASH ENCLOSURE		
12	021-0-140-190	11/20/08	SOLOMON	323	116	E	MATILIJA	ST	C-1	7729	PLUMBING		
13	024-0-010-110	11/20/08	CROWN	905			COUNTRY CLUB	RD	I-R-3	7727	DEMO PARTIAL POOL		
14	023-0-120-230	11/24/08	QUIMBY	407		S	SIGNAL	ST	R-3	7732	RE-ROOF	125	
15	024-0-132-066	11/24/08	BERNHOFT	420			SADDLE	LN	R-O-4	7731	FAU REPLACEMENT		
16	022-0-184-050	11/24/08	SAKAI	1221			AYERS	AV	R-1	7733	ADDITION	499	805
17	021-0-073-200	11/24/08	HUNTER	209	A	E	EUCALYPTUS	ST	VMU	7734	WATER LINE		
18	017-0-362-230	11/25/08	ROSEN	1400			ARUNDALE	ACCESS	R-O	7730	ELECTRICAL		
19	022-0-052-090	11/25/08	CUMBACK	706			GRAND	AV	R-1	7735	SEWERLINE		
			TOTAL INSPECTIONS				**65**				**TOTAL**		
			FINALED INSPECTIONS				**2**						
			CODE ENFORCEMENT				**11**						

Appendix 3

Air Quality Calculation Assumptions

AIR QUALITY APPENDIX 3 - Arundo Donax Removal Demonstration

Table 1: PEAK DAILY ORGANIC MATERIAL AND FUGITIVE DUST EMISSIONS

Herbicide Application

Maximum Organic Content (lb/gal)	Gallons per Day	ROG Emissions (lbs per day)
6.6	3	19.92

Source:
Material balance based on maximum possible organic content, with specific gravity 0.8.

Graded Surface

Emission Factor	Acres a Day	Days	Mitigation Reduction	PM10 Emissions
(lbs/day/acre)	(acres)	(days)		(lbs/day)
26.4	1.0	30	70%	7.9

Source:
Table A9-9 *SCAQMD CEQA Handbook, 1993*
Emission factors for chipping are not available from U.S. EPA, SCAQMD, or other reliable references.

SUMMARY OF ROG and DUST EMISSIONS

Units	Herbicide Application ROG	Graded Surface PM10
lb/day	19.92	7.92

No VOC in herbicide

AIR QUALITY APPENDIX 3- Arundo Donax Removal Demonstration

Table 1. DAILY MOBILE SOURCE EMISSION ESTIMATES FOR MECHANICAL REMOVAL/CHIPPING EQUIPMENT

Parameter	Units	Chainsaws	Power Cutters	Chipper	Bobcat	
Number of Equipment Units		2	2	2	2	
Operational Hours	hr/day	4	4	6	2	
Average Rated Horse Power	hp	5	5	100	75	
Typical Load Factor	%	25.00%	12.50%	100.00%*	100.00%*	
Emission Factor	g/hp-hr					
THC/ROCs		46.4	46.4	0.703618044	1.264614496	
CO		158.88	158.88	2.269937104	3.34297304	
NOx		1.92	1.92	4.123987291	2.87123736	
SOx		0.0036	0.0036	0.003686523	0.003628736	
PM10		0.25	0.25	0.377314514	0.305721008	
CO2		429.44	429.44	314.2677985	274.876752	
Total Daily Emissions	g/day	**Chainsaws**	**Power Cutters**	**Chipper**	**Bobcat**	
THC/ROCs		464.000	232.000	844.342	379.384	
CO		1588.800	794.400	2723.925	1002.892	
NOx		19.200	9.600	4948.785	861.371	
SOx		0.036	0.018	4.424	1.089	
PM10		2.500	1.250	452.777	91.716	
CO2		4294.400	2147.200	377121.358	82463.026	
Total Daily Emissions	lb/day	**Chainsaws**	**Power Cutters**	**Chipper**	**Bobcat**	**Total**
THC/ROCs		1.023	0.511	1.861	0.836	4.232
CO		3.503	1.751	6.005	2.211	13.470
NOx		0.042	0.021	10.910	1.899	12.872
SOx		0.000	0.000	0.010	0.002	0.012
PM10		0.006	0.003	0.998	0.202	1.209
CO2		9.467	4.734	831.396	181.797	1027.394
Total Project Emissions	lb/project	**Chainsaws**	**Power Cutters**	**Chipper**	**Bobcat**	**Total**
THC/ROCs		40.917	20.459	14.891	33.455	109.722
CO		140.106	70.053	48.041	88.438	346.638
NOx		1.693	0.847	87.280	75.959	165.778
SOx		0.003	0.002	0.078	0.096	0.179
PM10		0.220	0.110	7.985	8.088	16.404
CO2		378.695	189.347	6651.170	7271.872	14491.084

Note:

Refer to separate table for emissions associated with on-road vehicles

Off-Road 2007 Emissions Factors for 2004 2-stroke Gasoline Engines (Chainsaw/Power Cutter)

* Emissions converted from average load-g/hr to g/BHP, therefore load factor is 100%

Sources:

SCAQMD CEQA Air Quality Handbook Website Offroad Emissions Factors; year 2009

Offroad 2007

AIR QUALITY APPENDIX 3 - Arundo Donax Removal Demonstration

Table 2. Emissions Associated with On-Road Vehicle Trips

	Vehicle Trips per Day	Round Trip Miles	ROG	NOx	SOx	CO	PM10*	PM2.5*	CO2
Workers Commuting (LDGV)	10	30							
Auxiliary Pickup Trucks	6	8							
Emission Factor (lbs/mile)			0.00099245	0.00100518	0.00001066	0.00968562	0.00318601	0.00023384	1.09755398
Emissions (lbs/day)			0.3454	0.3498	0.0037	3.3706	1.1087	0.0814	381.9488
Cut Arundo Transport (Deliv.Truck)	5	8							
Emission Factor (lbs/mile)			0.00278899	0.02236636	0.00002679	0.02016075	0.00390550	0.00087228	2.72330496
Emissions (lbs/day)			0.1116	0.8947	0.0011	0.8064	0.1562	0.0349	108.9322
Total Emissions (lbs/day)			0.46	1.24	0.0048	4.18	1.26	0.12	490.88
Total Emissions (lbs/project)			18.28	49.78	0.19	167.08	50.60	4.65	19635.24

Notes:
Round Trip Miles are rounded up from 7.62
* Includes fugitive dust emissions factors where:

$$EF= K*(SL/2)^{0.65} *(W/3)^{1.5} - C$$

K = Particulate Site Multiplier = 0.016 for PM10, 0.0024 for PM2.5
SL = Silt Loading = 0.2 (baseline 500-5000 ADT range)
W = Weight = 3 tons (average vehicle weight)
C = Tire/Break wear Substration = 0.00047 for PM10, 0.00036 for PM2.5
PM10 EF = 0.0031 lbs/VMT
PM2.5 EF = 0.00018 lbs/VMT

Sources:
SCAQMD CEQA Air Quality Handbook Website Onroad Emissions Factors; year 2009
AP-42 Section 13.2.1

AIR QUALITY APPENDIX 3- Arundo Donax Removal Demonstration

TABLE 3. EMISSIONS SUMMARY

Air Pollutant	Mechanical Removal/Chipping (lbs/day)	Vehicles (lbs/day)	Maximum Daily (lbs/day)	Total Project Emissions (lbs/project)
Carbon Monoxide (CO)	13.470	4.177	17.647	513.72
Reactive Organic Compounds (ROC&THC)	4.232	0.457	4.689	128.00
Nitrogen Oxides (NOx)	12.872	1.244	14.117	215.56
Sulfur Oxides (SOx)	0.012	0.005	0.017	0.37
Particulates (PM10)	1.209	1.265	2.474	67.00

Appendix 4

Noise Modeling Calculations

Upper San Antonio Creek Watershed Giant Reed Removal Project, Noise Impact Estimates

Construction Equipment	Lmax Ref dBA @ 50 ft	Useage Per Hour (%)	Arundo Removal quantity	Staging Area quantity	Distance to Receptor feet	Arundo Equip Leq(h) dBA	Staging Equip Leq(h)
Chain Saw (or power brush cutter)	88	100	2	0	50	91.0	
Chipper	90	100	0	2	50		93.0
Total Quantity of Equipment:							
Peak Unmitigated Composite Leq(h):			**91.0**	**93.0**			

* Sources: County of Ventura, Construction Noise Threshold Criteria and Control Plan, November 2005. Chipper noise level is an estimate based on levels of similar pieces of equipment and available data found on-line. California Department of Forestry and Fire Protection, Meadow Vista Program Timberland EIR, June 3, 1999 (http://frap.cdf.ca.gov/projects/meadow_vista_pteir - see Chapter 8), shows a chipper having a noise level of 85 dB @ 50 feet. City of Gault, CWRS Transfer Station Final EIR, Corrections and Additions for Final EIR, Planning Commission, January 11, 2007, City Council, March 6, 2007 (www.ci.galt.ca.us/Site/Depts/Planning/CWRS2.pdf), Table 4.11-5, Noise Levels of Operational Equipment, shows a chipper/wood waste recycler (Peterson Pacific 2450, electric) with a noise level of 88.8 dBA at 30-feet; chipper/wood waste recycler (diesel power) has a noise level of 93.4 dBA at 30-feet.