

APPENDIX B - NOP RESPONSES



Gavin Newsom
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Kate Gordon
Director

Notice of Preparation

July 16, 2019

To: Reviewing Agencies

Re: Camarillo Springs GPA 2017-2
SCH# 2019070514

Attached for your review and comment is the Notice of Preparation (NOP) for the Camarillo Springs GPA 2017-2 draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

Jaclyn Lee
Camarillo, City of
601 Carmen Drive
Camarillo, CA 93010

with a copy to the State Clearinghouse in the Office of Planning and Research at state.clearinghouse@opr.ca.gov. Please refer to the SCH number noted above in all correspondence concerning this project on our website: <https://ceqanet.opr.ca.gov/2019070514/2>.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan
Director, State Clearinghouse

NOP Distribution List

A.H.

County: Ventura

SCH# 2019070514

Resources Agency

- ☒ Resources Agency
Nadell Gayou
- ☐ Dept. of Boating & Waterways
Denise Peterson
- ☐ California Coastal Commission
Alyson Hitt
- ☐ Colorado River Board
Elsa Contreras
- ☒ Dept. of Conservation
Crina Chan
- ☒ Cal Fire
Dan Foster
- ☐ Central Valley Flood Protection Board
James Herota
- ☐ Office of Historic Preservation
Ron Parsons
- ☒ Dept of Parks & Recreation
Environmental Stewardship Section
- ☐ S.F. Bay Conservation & Dev't. Comm.
Steve Goldbeck
- ☒ Dept. of Water Resources
Resources Agency
Nadell Gayou

Fish and Wildlife

- ☐ Depart. of Fish & Wildlife
Scott Flint
Environmental Services Division
- ☐ Fish & Wildlife Region 1
Curt Babcock
- ☐ Fish & Wildlife Region 1E
Laurie Hamsberger
- ☐ Fish & Wildlife Region 2
Jeff Drongesen
- ☐ Fish & Wildlife Region 3
Craig Weighman

- ☐ Fish & Wildlife Region 4
Julie Vance
- ☒ Fish & Wildlife Region 5
Leslie Newton-Read
Habitat Conservation Program
- ☐ Fish & Wildlife Region 6
Tiffany Ellis
Habitat Conservation Program
- ☐ Fish & Wildlife Region 6 W/M
Heidi Calvert
Inyo/Mono, Habitat Conservation Program
- ☐ Dept. of Fish & Wildlife M
William Paznokas
Marine Region

Other Departments

- ☐ California Department of Education
Lesley Taylor
- ☒ OES (Office of Emergency Services)
Monique Wilber
- ☐ Food & Agriculture
Sandra Schubert
Dept. of Food and Agriculture
- ☐ Dept. of General Services
Cathy Buck
Environmental Services Section
- ☐ Housing & Comm. Dev.
CEQA Coordinator
Housing Policy Division

Independent Commissions/Boards

- ☐ Delta Protection Commission
Erik Vink
- ☐ Delta Stewardship Council
Anthony Navasero
- ☐ California Energy Commission
Eric Knight

- ☒ Native American Heritage Comm.
Debbie Treadway
- ☐ Public Utilities Commission
Supervisor
- ☐ Santa Monica Bay Restoration
Guangyu Wang
- ☐ State Lands Commission
Jennifer Deleong
- ☐ Tahoe Regional Planning Agency (TRPA)
Cherry Jacques

Cal State Transportation Agency CalSTA

- ☐ Caltrans - Division of Aeronautics
Philip Crimmins
- ☐ Caltrans - Planning
HQ LD-IGR
Christian Bushong
- ☒ California Highway Patrol
Suzann Ikeuchi
Office of Special Projects

Dept. of Transportation

- ☐ Caltrans, District 1
Rex Jackman
- ☐ Caltrans, District 2
Marcelino Gonzalez
- ☐ Caltrans, District 3
Susan Zanchi
- ☐ Caltrans, District 4
Patricia Maurice
- ☐ Caltrans, District 5
Larry Newland
- ☐ Caltrans, District 6
Michael Navarro
- ☒ Caltrans, District 7
Dianna Watson
- ☐ Caltrans, District 8
Mark Roberts

- ☐ Caltrans, District 9
Gayle Rosander
- ☐ Caltrans, District 10
Tom Dumas
- ☐ Caltrans, District 11
Jacob Armstrong
- ☐ Caltrans, District 12
Maureen El Harake

Cal EPA

Air Resources Board

- ☐ Airport & Freight
Jack Wursten
- ☒ Transportation Projects
Nesamani Kalandiyur
- ☐ Industrial/Energy Projects
Mike Tollstrup
- ☐ California Department of Resources, Recycling & Recovery
Kevin Taylor/Jeff Esquivel
- ☐ State Water Resources Control Board
Regional Programs Unit
Division of Financial Assistance
- ☐ State Water Resources Control Board
Cindy Forbes - Asst Deputy
Division of Drinking Water
- ☒ State Water Resources Control Board
Div. Drinking Water # 6
- ☐ State Water Resources Control Board
Student Intern, 401 Water Quality Certification Unit
Division of Water Quality
- ☐ State Water Resources Control Board
Phil Crader
Division of Water Rights
- ☐ Dept. of Toxic Substances
Control Reg. # _____
CEQA Tracking Center
- ☐ Department of Pesticide Regulation
CFOA Coordinator

Regional Water Quality Control Board (RWQCB)

- ☐ RWQCB 1
Cathleen Hudson
North Coast Region (1)
- ☐ RWQCB 2
Environmental Document Coordinator
San Francisco Bay Region (2)
- ☐ RWQCB 3
Central Coast Region (3)
- ☒ RWQCB 4
Teresa Rodgers
Los Angeles Region (4)
- ☐ RWQCB 5S
Central Valley Region (5)
- ☐ RWQCB 5F
Central Valley Region (5)
Fresno Branch Office
- ☐ RWQCB 5R
Central Valley Region (5)
Redding Branch Office
- ☐ RWQCB 6
Lahontan Region (6)
- ☐ RWQCB 6V
Lahontan Region (6)
Victorville Branch Office
- ☐ RWQCB 7
Colorado River Basin Region (7)
- ☐ RWQCB 8
Santa Ana Region (8)
- ☐ RWQCB 9
San Diego Region (9)

☐ Other _____

☐ _____
Conservancy

Notice of Completion & Environmental Document Transmittal**2019070514**

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613
 For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

SCH #**Project Title:** Camarillo Springs GPA 2017-2**Lead Agency:** City of Camarillo**Contact Person:** Jaclyn Lee, AICP**Mailing Address:** 601 Carmen Drive**Phone:** 805-383-5616**City:** Camarillo**Zip:** 93010**County:** Ventura**Project Location:** County: VenturaCity/Nearest Community: Camarillo**Cross Streets:** Ridge View Street & Camarillo Springs Road**Zip Code:** 93012**Longitude/Latitude (degrees, minutes and seconds):** 32 ° 12 ' 02 " N / 118 ° 59 ' 16 " W **Total Acres:** 182**Assessor's Parcel No.:** 234-0-040-420, 595, 740, 751**Section:** _____ **Twp.:** _____ **Range:** _____ **Base:** _____**Within 2 Miles:** **State Hwy #:** 101**Waterways:** Conejo Creek**Airports:** _____**Railways:** _____**Schools:** Camarillo HS**Document Type:****CEQA:** ☒ **NOP**☐ **Early Cons**☐ **Neg Dec**☐ **Mit Neg Dec**☐ **Draft EIR**☐ **Supplement/Subsequent EIR**

(Prior SCH No.) _____

Other: _____**NEPA:**☐ **NOI**☐ **EA**☐ **Draft EIS** **Office of Planning & Research**☐ **FONSI****Other:**☐ **Joint Document**☐ **Final Document****Local Action Type:**☐ **General Plan Update**☒ **General Plan Amendment**☐ **General Plan Element**☐ **Community Plan**☐ **Specific Plan**☐ **Master Plan**☒ **Planned Unit Development**☒ **Site Plan**☒ **Rezoning**☐ **Prezone**☒ **Use Permit**☒ **Land Division (Subdivision, etc.)**☐ **Annexation**☐ **Redevelopment**☐ **Coastal Permit**☐ **Other:** _____**Development Type:**☒ **Residential:** Units 300 Acres 30☐ **Office:** Sq.ft. _____ Acres _____☐ **Commercial:** Sq.ft. _____ Acres _____☐ **Industrial:** Sq.ft. _____ Acres _____☐ **Educational:** _____☐ **Recreational:** _____☐ **Water Facilities:** Type _____ MGD _____☐ **Transportation:** Type _____☐ **Mining:** Mineral _____☐ **Power:** Type _____☐ **Waste Treatment:** Type _____ MW _____☐ **Hazardous Waste:** Type _____ MGD _____☐ **Other:** _____**Project Issues Discussed in Document:**☒ **Aesthetic/Visual**☐ **Agricultural Land**☒ **Air Quality**☒ **Archaeological/Historical**☒ **Biological Resources**☐ **Coastal Zone**☒ **Drainage/Absorption**☐ **Economic/Jobs**☐ **Fiscal**☐ **Flood Plain/Flooding**☐ **Forest Land/Fire Hazard**☒ **Geologic/Seismic**☐ **Minerals**☒ **Noise**☒ **Population/Housing Balance**☒ **Public Services/Facilities**☒ **Recreation/Parks**☒ **Schools/Universities**☐ **Septic Systems**☒ **Sewer Capacity**☒ **Soil Erosion/Compaction/Grading**☒ **Solid Waste**☒ **Toxic/Hazardous**☒ **Traffic/Circulation**☒ **Vegetation**☒ **Water Quality**☒ **Water Supply/Groundwater**☒ **Wetland/Riparian**☒ **Growth Inducement**☒ **Land Use**☒ **Cumulative Effects**☐ **Other:** _____**Present Land Use/Zoning/General Plan Designation:**

Land use = golf course, Zoning = RE (Rural Residential), GP designation = Public/Quasi-Public
 Project Description: (please use a separate page if necessary)

See attached Project Description. Additional parcel numbers: 234-0-181-115, 234-0-201-045 and 05

Note: The State Clearinghouse will assign identification numbers for all new projects. If a SCH number already exists for a project (e.g. Notice of Preparation or previous draft document) please fill in.



California
Department of Conservation
Division of Oil, Gas, and Geothermal Resources

Gavin Newsom, Governor
David Bunn, Director

July 26, 2019

Jaclyn Lee
City of Camarillo
Department of Community Development
601 Carmen Drive
Camarillo, CA 93010
jlee@cityofcamarillo.org

SCH # 2019070514
Project Title: Camarillo Springs GPA 2017-2
Project Lead Agency: City of Camarillo

Dear Ms. Jaclyn Lee:

The Division of Oil, Gas, and Geothermal Resources (Division) authority is set forth in Division 3 of the Public Resources Code (PRC), and Title 14 of the California Code of Regulations (CCR). PRC § 3208.1 establishes well reabandonment responsibility when a previously plugged and abandoned well may be impacted by planned property development or construction activities. Local permitting agencies, property owners, and/or developers should be aware of, and fully understand, that significant and potentially dangerous issues may be associated with development near oil, gas, or geothermal wells.

The Division has received and reviewed the Notice of Preparation for the above referenced project dated July 11, 2019. To assist local permitting agencies, property owners, and developers in making wise land use decisions regarding potential development near oil, gas, or geothermal wells, the Division provides the following well evaluations.

The project is located in Ventura County, within the abandoned Conejo field. Our records indicate 15 known oil, gas, or geothermal wells located within the project boundary as identified in the application. Of those wells, three are located within or adjacent to the Development Area, one is within the Recreation Area, and 11 are within the Parking area (Figure 1). Of the 11 wells in the Parking area 8 appear to already have structures or pavement over them.

The wells listed below are not abandoned to current Division requirements as prescribed by law. **It is the opinion of the Division that these wells require abandonment or reabandonment if they will be built over or have future access impeded. Wells that have existing structures over them do not require abandonment unless they will be re-developed over.**

Ms. Jaclyn Lee

July 26, 2019

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Well	Status
Conejo Syndicate Well No. 1 API 0411100552 <i>Inside development area</i>	The record review process shows that the abandonment status of this well is not abandoned to current Division standards as of July 26, 2019. Based on well records: <ol style="list-style-type: none"> 1. Zone plug is insufficient (CCR § 1723.1) 2. There is no record of a casing shoe plug (CCR § 1723.3) 3. There is no record of a surface plug (CCR § 1723.5)
Trinitas Oil Co. Well No. 1 API 0411121695 <i>Inside development area</i>	The record review process shows that the abandonment status of this well is not abandoned to current Division standards as of July 26, 2019. Based on well records: <ol style="list-style-type: none"> 1. There is no record of a zone plug (CCR § 1723.1) 2. There is no record of a casing shoe plug (CCR § 1723.3) 3. There is no record of a surface plug (CCR § 1723.5)
National Oil Co. Well No. 62 API 0411121677 <i>Near the development area</i>	The record review process shows that the abandonment status of this well is not abandoned to current Division standards as of July 26, 2019. Based on well records: <ol style="list-style-type: none"> 1. There is no record of a zone plug (CCR § 1723.1) 2. There is no record of a casing shoe plug (CCR § 1723.3) 3. There is no record of a surface plug (CCR § 1723.5)
National Oil Co. Well No. 68 API 0411121681 <i>In recreation area</i>	The record review process shows that the abandonment status of this well is not abandoned to current Division standards as of July 26, 2019. Based on well records: <ol style="list-style-type: none"> 1. There is no record of a zone plug (CCR § 1723.1) 2. There is no record of a casing shoe plug (CCR § 1723.3) 3. There is no record of a surface plug (CCR § 1723.5)
National Oil Co. Well No. 69 API 0411121682 <i>Inside parking area</i>	The record review process shows that the abandonment status of this well is not abandoned to current Division standards as of July 26, 2019. Based on well records: <ol style="list-style-type: none"> 1. There is no record of a zone plug (CCR § 1723.1) 2. There is no record of a casing shoe plug (CCR § 1723.3) 3. There is no record of a surface plug (CCR § 1723.5)

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Logsdon & Sloan Syndicate No 1 Well No. 4 API 0411121688 <i>Inside parking area</i>	<p>The record review process shows that the abandonment status of this well is not abandoned to current Division standards as of July 26, 2019.</p> <p>Based on well records:</p> <ol style="list-style-type: none"> 1. There is no record of a zone plug (CCR § 1723.1) 2. There is no record of a casing shoe plug (CCR § 1723.3) 3. There is no record of a surface plug (CCR § 1723.5)
Logsdon & Sloan Syndicate No 1 Well No. 1 API 0411121685 <i>Inside parking area – <u>already built over (?)</u></i>	<p>The record review process shows that the abandonment status of this well is not abandoned to current Division standards as of July 26, 2019.</p> <p>Based on well records:</p> <ol style="list-style-type: none"> 1. There is no record of a zone plug (CCR § 1723.1) 2. There is no record of a casing shoe plug (CCR § 1723.3) 3. There is no record of a surface plug (CCR § 1723.5)
Logsdon & Sloan Syndicate No 1 Well No. 3 API 0411121687 <i>Inside parking area – <u>already built over</u></i>	<p>The record review process shows that the abandonment status of this well is not abandoned to current Division standards as of July 26, 2019.</p> <p>Based on well records:</p> <ol style="list-style-type: none"> 1. There is no record of a zone plug (CCR § 1723.1) 2. There is no record of a casing shoe plug (CCR § 1723.3) 3. There is no record of a surface plug (CCR § 1723.5)
Equity Petro. Co. Equity 3 API 0411121665 <i>Inside parking area</i>	<p>The record review process shows that the abandonment status of this well is not abandoned to current Division standards as of July 26, 2019.</p> <p>Based on well records:</p> <ol style="list-style-type: none"> 1. There is no record of a zone plug (CCR § 1723.1) 2. There is no record of a casing shoe plug (CCR § 1723.3) 3. There is no record of a surface plug (CCR § 1723.5)
Equity Petro. Co. Equity 4 API 0411121666 <i>Inside parking area – <u>already built over</u></i>	<p>The record review process shows that the abandonment status of this well is not abandoned to current Division standards as of July 26, 2019.</p> <p>Based on well records:</p> <ol style="list-style-type: none"> 1. There is no record of a zone plug (CCR § 1723.1) 2. There is no record of a casing shoe plug (CCR § 1723.3) 3. There is no record of a surface plug (CCR § 1723.5)

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Dr. J. Von Gal-Scale Well No. 7 API 0411121702 <i>Inside parking area – <u>already built over</u></i>	The record review process shows that the abandonment status of this well is not abandoned to current Division standards as of July 26, 2019. Based on well records: <ol style="list-style-type: none"> 1. There is no record of a zone plug (CCR § 1723.1) 2. There is no record of a casing shoe plug (CCR § 1723.3) 3. There is no record of a surface plug (CCR § 1723.5)
International Oil Devel Inc. Lt Well No. 18 API 0411102251 <i>Inside parking area – <u>already built over</u></i>	The record review process shows that the abandonment status of this well is not abandoned to current Division standards as of July 26, 2019. Based on well records: <ol style="list-style-type: none"> 1. There is no record of a zone plug (CCR § 1723.1) 2. There is no record of a casing shoe plug (CCR § 1723.3) 3. There is no record of a surface plug (CCR § 1723.5)
B & B Oil Co. Well No. 1 API 0411100523 <i>Inside parking area – <u>already built over</u></i>	The record review process shows that the abandonment status of this well is not abandoned to current Division standards as of July 26, 2019. Based on well records: <ol style="list-style-type: none"> 1. There is no record of a zone plug (CCR § 1723.1) 2. There is no record of a casing shoe plug (CCR § 1723.3) 3. There is no record of a surface plug (CCR § 1723.5)
Charles E. Clinton Well No. 1 API 0411100554 <i>Inside parking area – <u>already built over</u></i>	The record review process shows that the abandonment status of this well is not abandoned to current Division standards as of July 26, 2019. Based on well records: <ol style="list-style-type: none"> 1. There is no record of a zone plug (CCR § 1723.1) 2. There is no record of a casing shoe plug (CCR § 1723.3) 3. There is no record of a surface plug (CCR § 1723.5)
B & B Oil Co. Well No. 3 API 0411100525 <i>Inside parking area – <u>already built over</u></i>	The record review process shows that the abandonment status of this well is not abandoned to current Division standards as of July 26, 2019. Based on well records: <ol style="list-style-type: none"> 1. There is no record of a zone plug (CCR § 1723.1) 2. There is no record of a casing shoe plug (CCR § 1723.3) 3. There is no record of a surface plug (CCR § 1723.5)

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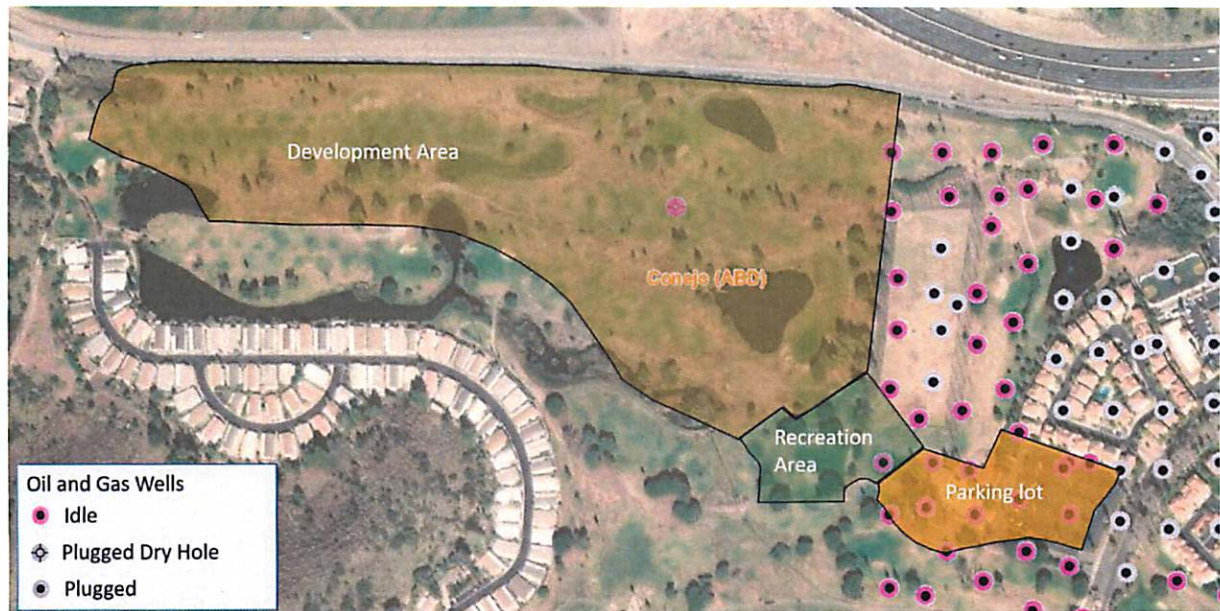


Figure 1. Map of known oil and gas wells in the vicinity of the proposed project. A map view of DOGGR wells is available at <https://maps.conservation.ca.gov/doggr/wellfinder>.

The Division categorically advises against building over, or in any way impeding access to, oil, gas, or geothermal wells. Access is considered the ability for a well servicing unit and associated necessary equipment to reach a well from a public street or access way, solely over the parcel on which the well is located. A well servicing unit, and any necessary equipment, should be able to pass unimpeded along and over the route, and should be able to access the well without disturbing the integrity of surrounding infrastructure. Items that can affect well access include, but are not limited to, buildings, housing, fencing, hardscape, landscape, trees, pools, patios, sidewalks, roadways, parking lots, waterways or channels, and decking. Impeding access to a well could result in the need to remove any structure or obstacle that prevents or impedes access.

There are no guarantees a well abandoned in compliance with current Division requirements will not start leaking in the future. It always remains a possibility that any well may start to leak oil, gas, and/or water after abandonment, no matter how thoroughly the well was plugged and abandoned. The Division acknowledges wells plugged and abandoned to the most current standards have a lower probability of leaking in the future, however there is no guarantee that such abandonments will not leak.

The Division advises that all wells identified on the development parcel prior to, or during, development activities be tested for liquid and gas leakage. Surveyed locations should be provided to the Division in Latitude and Longitude, NAD 83 decimal format. The Division expects any wells found leaking to be reported to it immediately.

Failure to plug and reabandon a well may result in enforcement action, including an order to perform reabandonment well work, pursuant to PRC § 3208.1, and 3224.

PRC § 3208.1 gives the Division the authority to order or permit the re-abandonment of any well where it has reason to question the integrity of the previous abandonment, or if the well is not

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accessible or visible. Responsibility for re-abandonment costs may be affected by the choices made by the local permitting agency, property owner, and/or developer in considering the general advice set forth in this letter. The PRC continues to define the person or entity responsible for reabandonment as:

1. **The property owner** - If the well was plugged and abandoned in conformance with Division requirements at the time of plugging and abandonment, and in its current condition does not pose an immediate danger to life, health, and property, but requires additional work solely because the owner of the property on which the well is located proposes construction on the property that would prevent or impede access to the well for purposes of remedying a currently perceived future problem, then the owner of the property on which the well is located shall obtain all rights necessary to reabandon the well and be responsible for the reabandonment.
2. **The person or entity causing construction over or near the well** - If the well was plugged and abandoned in conformance with Division requirements at the time of plugging and abandonment, and the property owner, developer, or local agency permitting the construction failed either to obtain an opinion from the supervisor or district deputy as to whether the previously abandoned well is required to be reabandoned, or to follow the advice of the supervisor or district deputy not to undertake the construction, then the person or entity causing the construction over or near the well shall obtain all rights necessary to reabandon the well and be responsible for the reabandonment.
3. **The party or parties responsible for disturbing the integrity of the abandonment** - If the well was plugged and abandoned in conformance with Division requirements at the time of plugging and abandonment, and after that time someone other than the operator or an affiliate of the operator disturbed the integrity of the abandonment in the course of developing the property, then the party or parties responsible for disturbing the integrity of the abandonment shall be responsible for the reabandonment.

To view PRC 3208.1 in its entirety, please visit <ftp://ftp.consrv.ca.gov/pub/oil/laws/PRC10.pdf>

No well work may be performed on any oil, gas, or geothermal well without written approval from the Division. Well work requiring written approval includes, but is not limited to, mitigating leaking gas or other fluids from abandoned wells, modifications to well casings, and/or any other abandonment or re-abandonment work. The Division also regulates the top of a plugged and abandoned well's minimum and maximum depth below final grade. CCR §1723.5 states well casings shall be cut off at least 5 feet but no more than 10 feet below grade. If any well needs to be lowered or raised (i.e. casing cut down or casing riser added) to meet this regulation, a permit from the Division is required before work can start.

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

1. To ensure that present and future property owners are aware of (a) the existence of all wells located on the property, and (b) potentially significant issues associated with any improvements near oil or gas wells, the Division recommends that information regarding the above identified well(s), and any other pertinent information obtained after the

Ms. Jaclyn Lee

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issuance of this letter, be communicated to the appropriate county recorder for inclusion in the title information of the subject real property.

2. The Division recommends that any soil containing hydrocarbons be disposed of in accordance with local, state, and federal laws. Please notify the appropriate authorities if soil containing significant amounts of hydrocarbons is discovered during development.

As indicated in PRC § 3106, the Division has jurisdictional authority over the drilling, operation, maintenance, and abandonment of oil, gas, and geothermal wells, and attendant facilities, to prevent, as far as possible, damage to life, health, property, and natural resources, damage to underground oil, gas, and geothermal deposits, and damage to underground and surface waters suitable for irrigation or domestic purposes. In addition to the Division's authority to order work on wells pursuant to PRC §§ 3208.1 and 3224, it has authority to issue civil and criminal penalties under PRC §§ 3236, 3236.5, and 3359 for violations within the Division's jurisdictional authority. The Division does not regulate grading, excavations, or other land use issues.

If during development activities, any wells are encountered that were not part of this review, the Division's construction site well review engineer in the Coastal District, Ventura office is to be notified immediately, and an amended site plan with well casing diagrams for Division review shall be filed. After appropriate review, the District office will send a follow-up well evaluation letter to the property owner, applicant, and local permitting agency.

Should you have any questions, please contact Justin LaForge at (805) 465-9626 or via email at justin.laforge@conservation.ca.gov.

Sincerely,

DocuSigned by:

E7667EB15E2C469...

Ewan Beenham
Senior Oil & Gas Engineer

cc: Well Files

DEPARTMENT OF TRANSPORTATION

DISTRICT 7 – Office of Regional Planning
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 897-0475
FAX (213) 897-1337
TTY 711
www.dot.ca.gov



Making Conservation
a California Way of Life

August 12, 2019

Ms. Jaclyn Lee
City of Camarillo
601 Carmen Drive
Camarillo, CA 93010

RE: Camarillo Springs GPA 2017-2 – Notice of
Preparation (NOP)
SCH # 2019070514
GTS # 07-VEN-2019-00313
Vic. VEN-101/PM: 10.956
VEN-34/PM: 12.78

Dear Ms. Jaclyn Lee:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced NOP. The proposed project is located within the City of Camarillo in Ventura County, at the 182-acre Camarillo Springs Golf Course. The project would result in a 30-acre portion of a golf course property experiencing the following changes:

- Amendment of the General Plan land use designation from Quasi-Public to Low-Medium Density Residential
- Zone change from Rural Exclusive and Rural Exclusive - 1 Acre Minimum Lot Size, to Residential Planned Development (i.e., up to 10 dwelling units per acre)
- Subdivision and development of the property for up to 300 new age-restricted (55+) residential units

The project would also involve reconfigurations of the remaining golf course, such as a new clubhouse facility and 8.5 acres of new neighborhood parks including a dog park, passive recreation area, and walking trails. The City of Camarillo is the Lead Agency under the California Environmental Quality Act (CEQA).

The nearest State facilities to the proposed project are State Route (SR) 101 and SR-34. The City of Camarillo has determined that an Environmental Impact Report (EIR) is required for the proposed project. Caltrans looks forward to receiving the draft EIR for review and to provide further comments, if warranted. From reviewing the NOP, the following intersections on the State highway may need to be included in the forthcoming transportation impact study (TIS), which will be included in the draft EIR:

- Camarillo Springs Rd & SR-101 westbound (WB) on-ramp
- Camarillo Springs Rd & SR-101 WB off-ramp
- Camarillo Springs Rd & SR-101 eastbound (EB) off-ramp
- Camarillo Springs Rd & SR-101 EB on-ramp

The locations to be studied should not be limited to those above. The above intersections may need to be studied in the TIS because it is likely that SR-101 and Camarillo Springs Rd will serve as main roads to travel to and from the project site. Thus, traffic from the project might cause queues to exceed the storage

lane capacity at these locations. Furthermore, if vehicle spillover occurs, significant speed differentials and increased transportation conflicts could occur.

The TIS should discuss the results of intersection, freeway, and interchange/ramp performance analyses at the above locations. Caltrans recommends that the Highway Capacity Manual (HCM) Sixth Edition method be used for conducting all operational and conflict analyses on State highway facilities. Specifically, queuing analyses based on the HCM queuing methodology are required for any Caltrans' off-ramps that would be potentially significantly impacted by the project. Also, when the State highway facility has saturated flows, it is encouraged that a micro-simulation model be used for the analyses.

The Tenth Edition of the Institute of Transportation Engineers' Trip Generation Manual should be used for determining trip generation forecasts and trip reductions (e.g. pass-by, diverted, and internal capture trips). Local trip generation rates are acceptable if appropriate validation is provided.

Also, if construction traffic is expected to cause delays on any State facilities, please submit a Construction Traffic Management Plan detailing these delays, as well as information on a Truck Haul Route Program, for Caltrans' review. Any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. We recommend large size truck trips be limited to off-peak commute periods to minimize congestion and ensure maximum safety conditions for pedestrians, cyclists, and motorists.

As a reminder, Senate Bill 743 (2013) mandates that Vehicle Miles Traveled (VMT) be used as the primary metric in identifying transportation impacts of all future development projects under CEQA, starting July 1, 2020. For information on determining transportation impacts in terms of VMT on the State Highway System, see the Technical Advisory on Evaluating Transportation Impacts in CEQA by the California Governor's Office of Planning and Research, dated December 2018: http://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf.

The following information is included for your consideration.

The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. Therefore, Caltrans encourages the Lead Agency to integrate transportation and land use in a way that reduces Vehicle Miles Traveled (VMT) and Greenhouse Gas (GHG) emissions, as well as facilitates a high level of non-motorized travel and transit use. We encourage the Lead Agency to evaluate the potential of Transportation Demand Management (TDM) strategies and Intelligent Transportation System (ITS) applications to meet these goals. Potential strategies for this project include:

- Providing services within the project site that would minimize the need for driving outside of the project site, such as grocery stores, farmer's markets, banks, barber shops, medical offices, shipping stores, and restaurants
- Promoting the use of small electric vehicles such as golf carts by providing charging stations throughout the project site
- Planting shade trees and bioswales to reduce storm-water runoff, which is a sensitive issue for Ventura county and needs to be considered during project design
- Offering bicycle and pedestrian facilities at project access and exit points
- Creating Class I, II, or IV bike facilities within the 8.5 acres of new neighborhood parks
- Designing internal project streets to have shorter blocks and a grid-like pattern that promotes walking and bicycling
- Constructing wide sidewalks with Americans with Disabilities Act (ADA) compliant ramps that are not obstructed by utility poles, perhaps through under-grounding utilities

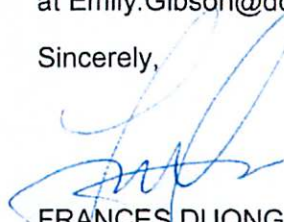
Ms. Jaclyn Lee
August 12, 2019
Page 3 of 3

- Installing high-visibility crosswalks with Continental or Ladder designs
- Providing convenient access connections to public transit
- Offering bus stops with shelters in the bulb-out style

For additional TDM options, please refer to *Integrating Demand Management into the Transportation Planning Process: A Desk Reference* (Chapter 8) by the Federal Highway Administration (FHWA). The reference is available online at: <https://ops.fhwa.dot.gov/publications/fhwahop12035/index.htm>.

If you have any questions about these comments, please contact Emily Gibson, the project coordinator, at Emily.Gibson@dot.ca.gov, and refer to GTS # 07-VEN-2019-00313.

Sincerely,



FRANCES DUONG
ACTING IGR/CEQA Branch Chief
cc: Scott Morgan, State Clearinghouse

NATIVE AMERICAN HERITAGE COMMISSION
Cultural and Environmental Department

1550 Harbor Blvd., Suite 100
West Sacramento, CA 95691 Phone (916) 373-3710
Email: nahc@nahc.ca.gov
Website: <http://www.nahc.ca.gov>
Twitter: @CA_NAHC



July 23, 2019

Jaclyn Lee
City of Camarillo
601 Carmen Drive
Camarillo, CA 93010

RE: SCH# 2019070514 Camarillo Springs GPA 2017-2, Ventura County

Dear Ms. Lee:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit. 14, §15064.5 (b) (CEQA Guidelines §15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

RECEIVED

JUL 29 2019

CITY OF CAMARILLO
COMMUNITY DEVELOPMENT

AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project: Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
 - a. A brief description of the project.
 - b. The lead agency contact information.
 - c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
 - d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).
2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).
 - a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).
3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
 - a. Alternatives to the project.
 - b. Recommended mitigation measures.
 - c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).
4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:
 - a. Type of environmental review necessary.
 - b. Significance of the tribal cultural resources.
 - c. Significance of the project's impacts on tribal cultural resources.
 - d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).
5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).
6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:
 - a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
 - b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

7. Conclusion of Consultation: Consultation with a tribe shall be considered concluded when either of the following occurs:
 - a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
 - b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).
8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).
9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).
10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:
 - a. Avoidance and preservation of the resources in place, including, but not limited to:
 - i. Planning and construction to avoid the resources and protect the cultural and natural context.
 - ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
 - b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - i. Protecting the cultural character and integrity of the resource.
 - ii. Protecting the traditional use of the resource.
 - iii. Protecting the confidentiality of the resource.
 - c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
 - d. Protecting the resource. (Pub. Resource Code §21084.3 (b)).
 - e. Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
 - f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).
11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
 - a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
 - b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
 - c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf

Some of SB 18's provisions include:

1. **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation.** There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation:** Consultation should be concluded at the point in which:
 - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
 - a. If part or all of the APE has been previously surveyed for cultural resources.
 - b. If any known cultural resources have already been recorded on or adjacent to the APE.
 - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
 - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
 - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
 - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
 - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
 - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
 - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
 - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address: Steven.Quinn@nahc.ca.gov.

Sincerely,



for
Steven Quinn
Associate Governmental Program Analyst

cc: State Clearinghouse

Pleasant Valley Recreation & Park District

Memorandum

To: Jacklyn Lee
From: Mary Otten
CC: Joe Vacca

Re: Camarillo Springs Golf Course – 1st Review of General Plan Amendment (GPA 2017-2), and Tentative Tact Map (TT-6016)

The proposed project is within the Pleasant Valley Recreation and Park District's boundaries and Sphere of Influence. The General Plan for the City of Camarillo has established that parks, open space and programs should serve all the people of Camarillo and provide a varying range of recreational activities. Per their application the current plans propose a new neighborhood park to include a dog park, passive recreation area, new walking trail around a small lake and open space corridors however; I don't see parkland dedication or Quimby fees addressed in this specific plan for open space and/or park space allocated for the general public.

As part of the City of Camarillo Recreation Element it recommends that for each 1,000 persons, a total of 2 ½ acres of neighborhood parks and 2 ½ acres of community parks should be required for a combined total of 5 acres of parkland per 1,000 residents.

The District offers the following comments regarding the determination of incompleteness. There are walking trails mentioned in the plan yet there is no connectivity to a current park system or access for all District residence. The District would ask the developer to work with the District to try and address the following items; 1) assure sufficient park land to meet the needs of the present and future population of the District, 2) plan parks, considering not only the anticipated use patterns and quality of design and development, but also the operation and maintenance costs, 3) address the need for additional open space, park space and connectivity to current parks for all residences, and 4)

address each agencies responsibilities for the operations and maintenance costs
for each item shown on the current plans.



WATERSHED PROTECTION
WATERSHED PLANNING AND PERMITS DIVISION
800 South Victoria Avenue, Ventura, California 93009
Sergio Vargas, Deputy Director – (805) 650-4077

MEMORANDUM

DATE: August 14, 2019

TO: Jaclyn Lee, Principal Planner
City of Camarillo

FROM: Sergio Vargas, Deputy Director S.V.

SUBJECT: TT6016 Camarillo Springs Golf Course
APN(s) 2340040595
Zone 3
Watershed Protection Project No: WC2019-0025

Pursuant to your request dated August 14, 2019, this office has reviewed the submitted materials and provides the following comments.

PROJECT LOCATION:

791 Camarillo Springs Rd., Camarillo CA

PROJECT DESCRIPTION:

The project applicant is requesting approval from the City of Camarillo for a 30-acre portion of the golf course property to: amend the General Plan land use designation from Quasi-Public to Low-Medium Density Residential (5.1-10 dwelling units per acre); change of zone from Rural Exclusive and Rural Exclusive - 1 Acre Minimum Lot Size to Residential Planned Development (up to 10 dwelling units per acre); subdivide and develop the property for the development of up to 300 new age-restricted (55+) residential units; and reconfigure the remaining golf course. The area proposed for the Project is located south of Ridge View Street and west of the existing golf course driving range. The remaining 152 acres of the golf course property would remain as Quasi-Public for golf course use. Development of the residential area would require a reconfiguration of the existing golf course which could result in the number of holes remaining at 18 or being reduced to 12 or nine. Other improvements proposed for the golf course include a new clubhouse facility and 8.5 acres of new neighborhood parks including a dog park, passive recreation area, and walking trails.

WATERSHED PROTECTION DISTRICT COMMENTS:

1. The proposed development is located approximately 500 feet east of Conejo Creek and includes sitework within the bed and banks of Conejo Creek which is a Ventura County Watershed Protection District (District) Jurisdictional redline channel. The project proponent is hereby informed that it is the District's standard that a project cannot impair, divert, impede, or alter the characteristics of the flow of water running in any District jurisdictional red line channel. All proposed activities that are within, over, or under the bed or banks of a District jurisdictional channel require a Watercourse Permit under the requirements of Ordinance WP-2. The Project must provide adequate mitigation measures to comply with the District's standard for peak attenuation, which is that the runoff after development shall not exceed the peak flow under existing conditions for any frequency of event or, alternatively apply the city standard, whichever is most restrictive shall apply.
2. The Draft EIR should address potential impacts to adjacent properties resulting from impacts to timing, bypass systems, and flood storage. This includes impacts to the city facilities adjacent to Conejo Creek.
3. The proposed project includes basins to mitigate impacts to flooding and Conejo Creek. The Draft EIR should provide enough detailed information to demonstrate the design and operation of the inlet weir and basin outlet for the flood storage basin proposed at the south of the property.
4. The two basins that are proposed for this project would require long term maintenance. Please identify in the Draft EIR the entity that would be responsible for the operation and maintenance of these facilities. Regardless who will conduct the maintenance, the Draft EIR should describe and analyze the long-term maintenance of the proposed facilities, including potential impacts associated with maintenance activities and provide best management practices to minimize these impacts.
5. Detailed technical comments regarding the feasibility and design of the hydraulic elements of the project have been provided to PACE Advanced Water Engineering in a letter dated April 15, 2019. The City and their consultants should use this letter to inform the technical portions of the Draft EIR.

END OF TEXT

Jaclyn Lee

From: J Camarda <jeffreycamarda@gmail.com>
Sent: Monday, August 12, 2019 2:29 PM
To: Jaclyn Lee
Subject: Concerning Camarillo Golf Course Development.

August 12, 2019
Jaclyn Lee, Principal Planner
jlee@cityofcamarillo.org

Attention:
Mayor Kevin Kildee
Vice-Mayor Tony Trembley
Councilmember Charlotte Craven
Councilmember Shawn Mulchay
Councilmember Susan Santangelo

To My Representatives:

We are residents and homeowners at Camarillo Springs and we are adamantly against the proposed development going forward. The impact on safety, traffic, environment, and wildlife will be severely compromised. Originally I kept an open mind about the development but as time went on and stories changed it became apparent to me and the other residents that the developers promises and claims are hollow.

Frankly, after doing my own research I'm astounded that the city would even consider this development in a flood zone. If the developer is so certain that all the homes in Camarillo Springs will be safe from flooding during severe rainstorms they should put up million-dollar bonds for EACH HOME to protect every single resident in case their projections don't work out.

We live here and we know how quickly it floods, despite best efforts, this development will only compound this problem.

Besides, why in the world would you transform a beautiful natural gateway to Camarillo into another housing project. Please reconsider allowing this development to proceed, and btw, despite the claims of the developer, this golf course has seen a significant increase in golfers. All the residents have noticed an upsurge in younger people and women using the golf course.

We don't have enough affordable recreation in Camarillo, why take this away.

This development is a bad idea, for everyone concerned, please don't destroy this beautiful environment that is an asset to the entire community of Camarillo.

Thank you for your time,

Jeffrey Camarda
David T. Vincent
Camarillo Springs Resident
Camarillo, Ca 93012

Jaclyn Lee

From: Max Fowler <ru2dmax@gmail.com>
Sent: Monday, July 15, 2019 10:47 PM
To: Jaclyn Lee
Subject: Camarillo Springs golf course development

To: Jaclyn Lee

From: Max Fowler
29 Isabel Ave, Camarillo, CA 93012
(In the Camarillo Springs Mobil home park)

Early on I was in agreement with the proposed development of the golf course. The developer made it sound like it would be a win win scenario. Truth is they plan to build a four foot high plateau and build 300 dwellings on it. Install huge pipes and dig trenches to deal with the flood plan issue. Dig a huge catch basin where holes 2 thru 6 now exist and build a so called berm by the wash to stop the water from coming from the other way. As an avid golfer and live and let live animal lover I want to express my concern for all the wild life that depend on the golf course and call it home. The Deer, rabbits, squirrels, ground hogs, Geese, ducks, Egrets, Hawks, a stunning number of different bird species to numerous to mention. And how about the Turtle I picked up in the street and put back in the pond that has fish in it. It's them I feel the most sad for. Sure I would like my home course to stay the way it is but I can go else where to golf. The animals may or may not be able to find another home. The developers hollow promise to preserve golf is unfounded and will most certainly spell the death of golf at Camarillo Springs forever. Then they can build more homes on the rest of the land.

Max Fowler.

Jaclyn Lee

From: Cheryl Harwood <cherylharwood7@icloud.com>
Sent: Monday, August 05, 2019 4:30 PM
To: Jaclyn Lee
Subject: EIR NUWI study on senior housing project at Camarillo Springs Golf Course

Will there be wheelchair accessibility into each home and common areas?

Will there be handicapped parking in residential areas and common areas?

Did you get my earlier email about the acreage of flood plains lost already to development since 1983, are old capped oil wells going to be tested on all sides and depths for leakage and contamination, since it will be for senior housing will there be accommodations for first floor bedroom and full bathroom with low rise shower stalls that have room for shower chair and will the stair case be extra wide so chair lifts can be accommodated, and lastly will reservoir be protected from becoming a public recreation area since it is adjacent to Chumash land?

Jaclyn Lee

From: Cheryl Harwood <cherylharwood7@icloud.com>
Sent: Thursday, August 08, 2019 10:28 PM
To: Jaclyn Lee
Subject: Camarillo Springs Golf Course NUWI development plan EIR

Good morning Jacklyn,
Here are some more questions:

- EIR What decibel level will result from the machinery/explosives used to excavate the 10 foot trench? Will it reach 85dB or more, which is dangerous to the human ear? This level could cause hearing loss to CCV residents.
- Will homes have wider hallways to accommodate walkers, and wheel chairs?

Have a nice weekend,
Cheryl Harwood

Jaclyn Lee

From: Cheryl Harwood <cherylharwood7@icloud.com>
Sent: Monday, August 12, 2019 11:03 PM
To: Jaclyn Lee
Subject: Camarillo Springs Golf Course EIR study

- Will you be using air drills to test how far down the basalt bedrock occurs in the back portion of the golf course where NUWI wants to excavate a reservoir?
- If basalt rock is found won't NUWI have to blast explosives to excavate to the depths they need for their reservoir?
- If explosives are used what effect might it have on neighboring lands/mountainsides?
- What is the name and contact information for the firm that has been contracted by the City of Camarillo Planning Department to evaluate and write the EIR?

Sincerely,
Cheryl Harwood

Jaclyn Lee

From: Cheryl Harwood <cherylharwood7@icloud.com>
Sent: Sunday, August 11, 2019 3:12 PM
To: Jaclyn Lee
Subject: Camarillo Springs Golf Course ERI

If this building project is approved and the built homes subsidize in 15 yrs. and the home owners were not made aware that they are buying property built over a once FEMA designated flood zone, can the city be sued by said owners for not informing them of possible risks? My research shows that subsidized homes with cracked foundations can cost \$6,000 to \$200,000 to repair. What are the risks of subsidized land in an area with underground aquifers, underground springs, excavated abandoned oil wells, and a FEMA designated flood zone? Even if oil wells are not right on build can you say with certainty that exploratory core samples were not taken thus disrupting the ground? Is this sound land to take a 300 home project when to pass FEMA they are to elevate the ground 10 feet? Isn't 1 cubic yard of soil equal to 1,000lbs? Not to mention the homes, foundations, furnishings, cars, streets, people etc. Won't this build put a lot of pressure on land that is already compromised with problems? I am holding the EIR responsible for a precise report, don't you think that the new homeowners will expect the same?

Sincerely,
Cheryl Harwood

Jaclyn Lee

From: Jing Huang <jinghuangj@gmail.com>
Sent: Monday, July 22, 2019 4:51 PM
To: Jaclyn Lee
Subject: Vote Against ("NO") project - Camarillo Springs General Plan Amendment (GPA) 2017-2, Change of Zone (CZ)327, tentative tract map (TT) 6016, (SUP) 6

Ms.Jaclyn:

I am a home owner of Camarillo Springs Townhome Association. I strongly vote against the following project:

“ Camarillo Springs General Plan Amendment (GPA) 2017-2, Change of Zone (CZ)327, tentative tract map (TT) 6016, Residential planned development permit and modified to special use permit (SUP) 6”

The project will severely damage the interest of current residence and adversely impact the environment. As a result, I vote “ NO” to this project!

Thank you.

Sent from my iPhone

Jaclyn Lee

From: Joe <jokeralice@aol.com>
Sent: Sunday, August 11, 2019 5:12 PM
To: Jaclyn Lee
Subject: Camarillo Springs Development

Dear Ms Lee,

I am a concerned citizen and property owner in Camarillo Springs. The proposed development on the Golf Course is troubling in a number of ways.

- | | |
|-----------------|---|
| First | The 101 Highway is Presently not able to handle North bound traffic with only three lanes.
The Off ramp is inferior as it stands and light signals with more street lighting would be warranted. |
| Second
mud | The Golf course turns into a flood basin /lake with heavy rains and the rivers of water and
flowing down from the mountain need a place to go. |
| Third
was | The Geologic stability of the mountain is concerning. The original blasting to make the RV lots
questionable at the time but mobile homes didn't disturb the toe of the mountain too much.
Major excavating and engineering with vibration and traffic will largely change the original
developers calculations and intents. |
| Fourth
where | The area is extremely beautiful and is a wildlife habitat which most residents used to decide
they wanted to put down roots. Any proposed development should need to include an over-
abundance of Trees and plants to try and recreate what it destroyed. |

Thank you for considering my thoughts before making your decisions.

Joe Karalius
43 Irena Avenue
Camarillo Springs 93012
805 233-4599

Jaclyn Lee

From: City of Camarillo Planning
Sent: Tuesday, July 16, 2019 3:10 PM
To: Jaclyn Lee
Cc: David Moe; Joe Vacca
Subject: FW: Cam Springs Golf Course Proposed Development

Hi Jackie,

See below for your reference.

Monique Martinez
Senior Administrative Specialist
City of Camarillo
Dept. of Community Development
601 Carmen Drive, Camarillo, CA 93010
805-388-5363
www.cityofcamarillo.org

From: Allen Bander [mailto:banderallen@gmail.com]
Sent: Monday, July 15, 2019 10:52 AM
To: City of Camarillo Planning <planning@cityofcamarillo.org>
Subject: Cam Springs Golf Course Proposed Development

Dear Sirs and Madams,

We are strenuously opposed to the proposed development on Camarillo Springs golf course.

We have lived there for quite some time and have noticed and enjoyed the lush and thriving wildlife communities in the area, including many mammal, bird, fish, reptile, etc., some of which are rare and possibly endangered. We often walk on the golf course around dawn or dusk and it is quite remarkable, to say the least. There are also some very old trees growing there, some of the oaks and sycamore likely a few hundred years old. It would be a huge loss to the community and really the world if all this was destroyed.

On top of that, the springs are profoundly quite and peaceful with little traffic and almost no noise most of the time. It is also very clean, with literally no litter or other pollution to be seen anywhere.

Furthermore, the proposed building area is a natural watercourse when it rains, and also contains natural springs that would be easily disturbed.

This development threatens all that and more. Many of the residents are in their 80s and 90s too, and would be easily disturbed...this presents a clear danger to people of that kind of age as well, as increased traffic could cause them to be run over, and increased noise would heighten their stress levels in what is now a very peaceful and bucolic environment.

There is essentially endless empty land in this great state. There is no compelling reason for this development to be built in this location at this time. The company behind it also has a rotten history (read about their actions in Escondido, Calif. for the kind of people they are...they are predatory and greedy, and worse...criminal in fact).

Nothing good will come of this, but one of the nicer communities in the area will likely be irreparably damaged and maybe destroyed. People are already selling their homes just because this might happen.

Please don't permit this.

Sincerely,

Bruce McDonough

GPA 2017-2
New Urban West Inc
791 Camarillo Springs Road

EIR Issues

By Mike Mishler

Camarillo resident

Mikemm3@gmail.com

August 13, 2019

- **Biological Resources**
 - **Wildlife Movement Issues**
 - How will the proposed housing pad and expanded pond water impact (restrict) the movement of terrestrial animals.
 - How will the proposed massive excavation for the new proposed golf course in the south-west site area (slope across from city treatment plant) resulting in rock cliff face's impact (restrict) the movement of terrestrial animals. Also, how will future flooding of these cuts (along with the rock cliff's) impact the movement of terrestrial animals.
- **Geology**
 - **Previous oil seeps and possible existing or future oil seeps**
 - **Background:** Camarillo Springs area originally had multiple oil seeps. These oil seeps were apparently from a shallow oil field (Conejo Oil Field) located only several hundred feet below the surface.
 - **Issue:** What is the current status of any potential oil or gas seeps. What is the plan to deal with any current or potential future seeps? Who will be responsible for dealing with potential future seeps (the city or HOA or other)? Should selected potential seep areas be restricted from development due to current or potential future seeps.
 - **Excavate basalt rock from proposed south-west excavation area issue**
 - The excavation zone from the south-west proposed golf course area consists of basalt rock (Conejo Volcanic Formation). The soil profile here is very thin. It is very likely that most of the material excavated from this area will be rock and not soil. Can this excavated rock be used for building the new development pad? Note that rock cannot be compacted to create development pad. Also note that rock will allow water to flow through the pad

- causing flooding. If the excavated rock cannot be used, where is the soil required for the development pad going to come from?
 - It is also likely that the excavation zone will require blasting to remove the rock. What are the impacts of blasting? Blasting could impact the existing structures, pipelines, animals, generate noise, generate new oil seeps and generate hazardous dust.
- Greenhouse Gas Emissions
 - Calculating greenhouse gas emissions if excavated basalt rock (see ref: Geology – Excavated basalt rock) cannot be used to build the development pad issue
 - If the excavated basalt rock is not useable for building the development pad, then the excavated rock must be moved offsite and one or more offsite sites must be used to supply soil required to build the development pad. These truck offsite trips will generate additional greenhouse gas emissions and traffic that must be addressed in the EIR.
- Hazards and Hazardous Materials
 - Historical oil wells development issues
 - Background: Site was part of the Conejo Oil Field
 - Issue: Site contains abandoned oil wells and oil facilities
 - Abandoned oil wells must be located and properly checked and abandoned.
 - Site might also contain contaminated soils from past oil operations. Site must be checked for any contaminated soils from past oil operations.
 - Contaminated soils from farming use issue
 - The excavation basalt rock zone lies within the mapped farming contaminated soils area. Excavation blasting will generate hazardous dust. Blasting generated hazardous dust must be addressed by the EIR.
- Hydrology
 - New proposed pond issues
 - Where is water for pond coming from? How is the sourcing of pond water going to affect the local water supply issues?
 - Who is responsible for maintaining the pond? Over time the pond will start to fill in with sediments. Who is going to maintain pond water quality and depth?
 - Flood water balance issue
 - Is the flood water volume displaced by the development on the existing golf course offset 100% by the excavation area across from the city water treatment plant? Is there any net effect on the flood

- water volume caused by this development? How does this development impact the 100-year (model) flood event? What are the potential offsite flooding impacts from this development?
- Future flood stage potential increase issue
 - What is the potential that future flood stages may be higher? This has already happened in the past (resulting in some of the original Camarillo Springs homes now being in the flood stage). What are the risks that future flood modeling will result in higher flooding stages?
 - Camarillo Springs drainage tunnel (10 feet by 6 feet) issues
 - Is drainage tunnel water transport capacity during a maximum flooding event large enough to cover a 100-year flash flood event coming from the Conejo Mountain area? Note that the Conejo Mountain slopes have very little soil. Also, the Conejo Mountain slope is steep so the water runoff will be very rapid. So must model and assume that all rain falling will quickly move down the mountain toward the drain.
 - How much extra water transport capacity does the tunnel have to cover any possible debris flow into tunnel which would reduce its capacity.
 - Camarillo Springs Road embankment where the new drainage tunnel starts will have to be studied to see if could now serve as a levee. Water may back up against the existing Camarillo Springs Road embankment and result in the road embankment acting temporarily as a levee/dam. The issue is that an existing road embankment (built to only be a road embankment and not a levee) will how have to perform as a levee/dam must be addressed. Will the road embankment need to be rebuilt to a levee/dam standard?
 - How will the new tunnel perform if the outlet is partly blocked by debris from the Conejo Creek? Conejo Creek flooding could deposit sediment and debris at the tunnel outlet, reducing or blocking its use.
 - Who is going to be responsible for the tunnel cleaning and maintenance? Will the city have to take over responsibility for its maintenance.
 - Pond two 24-inch storm drains issues
 - Are the two storm drains drainage capacity during a major flooding event large enough to cover a 100-year flash flood event into the pond area.

- How much extra water transport capacity does the storm drains have to cover any possible debris flow into the storm drains which would reduce its capacity.
 - How will the new storm drains perform if the outlet is partly blocked by sediment and debris from the Conejo Creek? The flap gates can easily be blocked closed or prevented from closing correctly. What are the impacts if the flap gates temporary fail closed or open?
 - Who is going to be responsible for the storm drains cleaning and maintenance? Will the city have to take over responsibility for its maintenance.
- Water leakage under the new development pad issue
 - The possibility of water moving under the new development pad into the pond area must be addressed. Flood waters can travel through old trenches (or existing soils) that are covered by the new development pad to spring up in the pond area causing flooding. What will be done to check for and correct this potential problem?
- Land Use and Planning
 - Impact on community recreation and open space issue
 - What are the impacts to the Camarillo community of reducing the site's recreation and open space services/availability?
 - What options are available to offset the site's reduced recreation and open space services/availability for the Camarillo community.
- Traffic and Circulation
 - Impacts to local intersections issue
 - Background: Previous traffic computer models have been flawed and invalid. At least two previous traffic models were incorrectly set up. This is a computer modeling issue.
 - Classic example of this modelling problem is the Santa Rosa Road & Adolfo Road intersection.
 - First, previous traffic models did not include time for the pedestrians (high school students) to walk across the intersection. This is a wide intersection and many students use the cross walks. This pedestrian use time can not be used for vehicles to travel through the intersection. Pedestrian use time must reduce the time for vehicles to use the intersection. In other words, the previous models assumed no time for pedestrian use.
 - Second, Santa Rosa Road going north from the intersection temporarily contains 3 vehicle lanes. But the third lane only exists for a very short distance.

Previous traffic models have incorrectly modelled 3 vehicle lanes as full standard never ending lanes. Santa Rosa Road can not be modelled with 3 full lanes going north. The third lane is very restricted and not a full-service lane. So, the third lane must not be modelled as a normal full-service lane that can carry the same number of vehicles as the 2 full-service lanes.

- All intersections near the high school must include model time for pedestrian use (and reduce time available for vehicle use).
- Santa Rosa Road can not be modelled as 3 full-service lanes going north from Adolfo Road. Santa Rosa Road contains only 2 full-service lanes and 1 very restricted service lane going north from Adolfo Road. The traffic model must reflect the true conditions.

Jaclyn Lee

From: Brian Morris <brianmorris@dslextreme.com>
Sent: Tuesday, July 30, 2019 2:52 PM
To: Jaclyn Lee
Subject: Pesticides and Camarillo Springs Golf Course
Attachments: Cam Springs EIR Wishtoyo-Agritoxins-Report.pdf

Hello Jaclynn;

We wanted to add this attachment to our EIR topics dated 7/23/2019 as well as the two links below.

It's requested that the EIR include extensive testing of the ground proposed to be disturbed in constructing the NUWI housing and golf course project.

Please request that the soil be tested in several locations around the property and at sufficient depths.

Contaminates can be found around abandoned oil wells, areas that were used for agriculture and areas used as a golf course especially where "round-up" was used.

These contaminants can cause diseases such as Parkinson's and contribute towards respiratory deaths.

Two additional sources:

<https://www.nap.edu/read/9615/chapter/2>

<https://www.apdaparkinson.org/article/the-relationship-between-pesticides-and-parkinsons>

Brian Morris
805-484-1299
Direct e-mail: brianmorris@dslextreme.com
Website: www.opposecamspringsbuilding.com

Oppose Camarillo Springs Building

Study topics for EIR GPA 2017-2 and CZ 327

Opening Comments:

The following comments concern the Camarillo Springs NOP document dated July 11, 2019.

The importance of fully addressing "ALL" of the environmental issues identified below must be underscored. While it is tempting to prioritize the issues, the "bottom line" is that each of them is vital and they are interdependent – what affects one affects all.

The Draft Environmental Impact Report MUST be done thoughtfully and thoroughly with no "cutting corners" in the interest of saving time or money. Each of the identified topics contains many issues to be explored. The City of Camarillo and the current and future residents of Camarillo Springs will have to live with the results of this Draft EIR far into the future. We will not be able to "undo" the important decisions made based on the findings.

It is vitally important that those evaluating the identified environmental issues do so with the highest standards of professional and personal integrity and without regard to any threats, promises, or unsupported representations of fact. The process must be transparent, independent, and based on the latest scientific methods, findings, and standards. Assumptions must be clearly stated and based on verifiable evidence.

The applicant's project has already been the subject of controversy both within and outside the Camarillo Springs community. This EIR will be thoroughly reviewed by many interested parties. Whatever the outcome, the findings of the Draft EIR should leave no room for additional equivocation, controversy, or challenge.

The Draft EIR will not be accurate and truly reflect the actual impacts of the proposed development if the Project Applicant continues to change what is being proposed. The information provided to the residents of the Camarillo Springs neighborhoods affected by the proposed project has been changed repeatedly by the project applicant. Details are vague or are "yet to be decided". The exact nature of the project must be "nailed down" and cannot continue to "be determined at a later date."

The residents (and voters) of Camarillo expect that the City of Camarillo and the Department of Community Development to manage the Draft EIR process in a manner that acknowledges the short-term and long-term importance and impact of the proposed project on our city and county. We expect that the City of Camarillo and the Department of Community Development remain objective and not succumb to threats, promises, or "theatrics" on the part of outsiders who may believe that money and "influence" can affect the content and conclusions of the report.

Oppose Camarillo Springs Building Overview (Link01):

We are an ad hoc organization with a current membership of 480 "Camarillo homeowners" of which most live in Camarillo Springs (Contact04). We have been active since 9/27/2017 opposing the new homes construction and golf course destruction that the Camarillo Springs City Council approved in GPA 2017-2 and CZ 327. Since that date we have been gathering facts to further support our opposition and to justify the denial of these amendments.

We are fully aware that we are facing a steam roller driven by power, practice, money and greed while we're equipped with a sling shot and pebbles made of neighborhood, beauty, preservation, and good common sense. We can only hope the Camarillo City Council will side with Camarillo's resident's needs and not the proficient bullying tactics already exposed by Chameleon, LLC and New Urban West, Inc.

Last Page = Contact Information (Contact00), Websites links (Link00) and Attachments (Attach00)

Aesthetics/Visual Resources:

Approval of these amendments will erase the Camarillo Springs Golf course which has served as a welcoming ambassador into Camarillo for all those traveling down the hill north on 101. Adjacent to vast farmlands with the ocean in the distance and a huge lemon tree grove on the right our visitors can't help but relax and marvel at our unique beauty. They are reminded of the concrete maze they came from and encouraged that there are better environments for their family. We and most Camarillo citizens do not want this "progress".

On 9/27/17 Councilmember McDonald made it clear during the public session that her vote would be dependent on proposing single level homes only. No two story -or- loft homes. NUWI's latest plans that were presented to the public and are available for view on our website (Link01) include several two-story models. We feel the public promise from Mr. Han to Councilmember McDonald was broken. We do not support any homes, but if we are defeated, we request only single-story homes for our aging population (Attach05).

The view from the Camarillo Springs Country Club Village manufacturer homes is as squatters were looking up at the castle from across the moat. NUWI has presented visuals that clearly do not represent the reality of this view which is only approximately 220' (Attach01).

Air Quality:

The most obvious intrusion will be the poisonous dust created by the construction equipment and bare earth. We all know this area to be "reconstructed" was once farmland while DDT was used regularly. It is proven that Parkinson and other diseases are caused by contaminated soil. Please run the appropriate soil samples and report the results as well as what restrictions if any will be given the developers in keeping the dust from reaching the homeowners with pulmonary and cardiac conditions. Most residents are greatly concerned about this (Link02).

Biological Resources:

In our studies we found there were many abandoned oil wells located on the property (Link03). We were told by DOGGR that many were registered, but it appears never drilled. Many others as you can tell by their details produced oil or gas and were later "plugged and abandoned" (Link07). Please request a review by DOGGR of those wells located in any area where excavation is proposed to determine if the casing needs replacement (Contact03).

Cultural Resources/Tribal Cultural Resources:

Please follow-up with Julie Tumamait who is the Chumash Indian Tribal Chair for the Camarillo Area (Contact01). We became concerned when one of our members sent us this link (Link05) describing past Chumash discoveries causing development stoppages and we were then told by other residents that they were aware of Chumash Indian Sites within our properties.



Geology and Soils:

The soil must be thoroughly tested. Further, all precautions must be stipulated to protect the homeowners from soil and dust contact. This is a very important issue and concern for the residents.

Greenhouse Gas Emissions:



No input.

Hazards and Hazardous Materials:

No input

Hydrology and Water Quality:

The obvious issue is the proposed flood control plan in which we believe is faulty and only serves the developer's construction needs.

- 
- The flap gates can be left open due to debris and cause water to back into the property.
 - The proposal assumes the flood level will always be 118 feet. In time it may increase due to ever increasing development up stream in the Conejo Creek and, of course, global warming.
 - The new proposed levee may fail. Squirrels and similar burrowing rodents have failed many a levee.
 - The plan to excavate the rear section of the golf course in order to take the pressure off the then removed golf course floodplain is questionable. Will it protect the water treatment plant? Will the excavation be enough to hold all the required water capacity? Why are we taking these chances for a few unnecessary and unwanted homes?
 - On 7/18/19 the designer for a NUWI golf course stated the rear section of the course must store 450-acre feet of water across the creek from the City's reclamation plant, but no mention of how that water will be removed once the creek level falls to the point below the entry level. If pumping is required, and once the golf course fails, there will not be anyone to maintain the pump system nor pay for its operation. Without proper drainage, there will be a host of issues caused by such a large amount of non-circulating water.
 - The proposed flood control plan seems to be very involved and its success seems to be dependent on specific modeling and limitations. Camarillo Springs has a troubling history of flooding both from the Conejo Creek and the surrounding mountains which pour into our community (Attach03). A flash flood of water, mud and rock filled up 12 homes in December of 2014 due to poor engineering and planning of "The Springs" development up against our mountain. One and a half million dollars+ of our tax money was spent by the City of Camarillo to construct a still untested fix to the problem. Why? The developer is gone, and the project had been approved by The City of Camarillo without a build site engineering report referencing the mountainside location. The taxpayers don't need to pay for anymore "fixes" if the flood control plan proves faulty.
 - Not enough study of the flash flood history and future capabilities of the mountain runoff has been conducted. The plan does little to prepare for future flash floods (Attach04). During heavy storms those two 24-inch pipes running under Camarillo Springs Road will plug up with debris early in the event. Mother Nature does not acknowledge computer models.
- 

- The Camarillo Springs Golf Course is built on a flood plain, and century old springs which are connected to the aquifers below. The developer wants to cover up the floodplain and the springs. Again, a whole lot of damage to our community for a few unnecessary and unwanted homes.
- If a golf course is sold by NUWI after new home construction, we anticipate the new owners to go out of business within a short period. Please confirm who would assume maintenance responsibilities for the man-made lake and surrounding property in front of the Country Club Village homes (Attach01).
- It is quite possible the new housing project will experience subsidence (Attach07). This disaster has befallen many a housing project with similar conditions (Link06). Unfortunately, the damage usually doesn't appear until after the magical 10-year anniversary. After 10 years the developer is no longer responsible, and insurance does not cover subsidence. The next cash source will be the City of Camarillo who approved the project. The result will be a payout of more tax dollars by the responsible and trustful taxpayers of Camarillo.
- We ask that you review the Calleguas Creek Riparian Restoration (Link05) in reference to the Camarillo Regional Park, Calleguas Creek watershed and California State University Channel Islands. Conservation Department: Shawn Anderson 805-437-8984

Land Use and Planning:

It is our belief the amendments are not able to move forward without an approval to re-zone the land in question.

We are concerned about the approval process for the FEMA approval and any permits issued by the City of Camarillo prior to FEMA approval. It appears the city can approve the grading for this project for the developer to obtain FEMA approval. If grading occurs prior to the final approval/denial of this project by the Camarillo City Council, the golf course will already be gone, the excavation will be completed, the mountain built, etc. This would mean the project will only need a rubber stamp of approval. We hope we misunderstand this scenario.

Noise:

Of course, the community will be plagued by construction noise. Perhaps all equipment must be solar powered.

Population and Housing:

Undetermined-No input.

Public Services and Recreation:

Still, the supposed golf course is still under design. The latest sketch hopes to deliver a 12-hole brand new course with a new driving range. The designer stated; "A 9-hole course is not an option" in a 7/18/19 public meeting by NUWI's agents. A park and dog park in the sketches were designated suspect in the same meeting by NUWI's agent (Attach02).

The information NUWI has produced indicates the balance of the property not being rezoned is available for use by the golf course. The golf course architect states there is only 85-90 acres available for the course, a very substantial difference than what the property maps indicate and previous reports to the City of Camarillo.

Proposed plans show the existing driving range with homes adjacent on one side, and park space on the other side. Golf balls have a propensity to leave the premises of a driving range either by going over/under the fencing, or through holes in the fencing. Having adjacent housing and casual recreation next to the driving range is incompatible, and potentially very dangerous.

In the September 27, 2017 Camarillo City Council referral approval meeting Councilmember Trembley made it public and perfectly clear that his approval vote was dependent on his receiving a report by Jacob Han prior to (we believe) the E.I.R. preparation. This report was to determine the construction and operating cost of the golf course and the projected profit/loss. The same report would also include a restaurant and lounge. Since Mr. Han confirmed his plans are to sell both prior to home construction completion it was clear Councilmember Trembley was helping Mr. Han determine how easy it will be to sell both features given their obvious limitations. We would like this report to a part of the E.I.R.

It is our belief that without a buyer there will never be a new golf course built nor a condensed existing course. It would be nonsense to build out a restaurant for the clubhouse without an owner as well.

The 18-hole golf course will be gone. It's unlikely any shorter version will ever be built. If one is built it will fail due to weak income and turn to weeds as only one buyer will be interested. Chameleon LLC and New Urban West will petition the City of Camarillo to build more homes on the north properties where the golf course was to be. More homes will be built. Just as was planned. No golf course, no open spaces, no wildlife. There will, however, be more traffic and concrete.

The Camarillo Springs Golf Course was purchased by Chameleon, LLC and is their property. They purchased a functioning and historically profitable golf course, the largest public recreation space in Camarillo, a floodplain, zoning not suitable for housing, protected Chumash Indian sites, abundant and protected wildlife, contaminated soil if disturbed, congested traffic and the potential for major flooding and mud slide activity.

Traffic and Circulation:

There are currently 16 residential projects for 1401 units (3502 persons) in process in little Camarillo. When you add the 3 EIR (GPA) projects currently under consideration it adds another 844 units (2110 persons) totaling 5,612 persons! Source DCD May project status report. An 8% increase in population!

This equates to $2,245 \text{ units} \times 2 = 4,490 \text{ cars} \times 4 = 17,960 \text{ one-way trips per day}$. Conclusion: There will be more traffic.

The Camarillo Springs Exit (North bound) is dangerous. The warning signs are driven over as quickly as Cal Trans can replace them. One day somebody's going to get killed there. Adding the traffic from 300 new homes will greatly improve those odds. The same is true for the Entrance (North bound). We request an all new exit and entrance be built for the northbound traffic at Chameleon LLC's expense. As they seek to improve our neighborhood, we're certain they will want to ensure the safety of their customers as well.

Our community is extremely concerned about the dumping of approximately 600 more cars into our small area in terms of traffic, but also EVACUATION. We all had a wakeup call a few months ago when we were evacuated from our Camarillo Springs neighborhoods. We had very little warning and time to react. It took some residents 2.5 hours in bumper to bumper traffic to be safely out of the

gates. That was frightening and could have ended in tragedy as it did in Northern California that same day. Although we as a neighborhood must work to do better; we reject the idea that the 300 homes more homes directly in the way of our escape will do anything but plug it up even more.

We are asking that a stop light be installed at the intersection of Camarillo Springs Road and Adohr lane/Ridge Way. The influx of traffic will require one and will be helpful during evacuation.

We also ask that a stop light be installed at the intersection of Camarillo Springs Road and the Golf Club entrance to this proposed project. There will be similar traffic issues at this point as well.

We insist that an access road without any obstruction be available for the Camarillo Springs Country Club Village residents located on the north end of Margarita be available to access Ridge Way. In case of fire, CSCCV needs a back way out in case of fire or other emergencies where evacuation is required. During our last fire a few months ago, one person had to ram through the golf course maintenance gate to help herself and others lined up behind her evacuate the neighborhood to safety.

We ask that Ridge Way road be expanded to 4 lanes. The intersection of Ridge Way and the north entrance/exit to the proposed plan must also have a traffic light as well. Marked as S7.

Utilities and Energy:

Understanding the proposed new homes will also be Camrosa water customers, we ask that a thorough study be made as to how much new water will be required for these new customers, where it's going to come from and just how it's "not" going to increase our water bills. We have one winter without a drought; water rates are forced up and now they propose creating more water usage.

Wildlife:

The Camarillo Springs Golf Course and the surrounding properties are the home and migratory path for a large variety of wildlife of which many species are endangered. Some have four legs and others have wings (Attach06). The springs ponds are migratory homes for water fowl who will surely be disrupted if the ponds disappear. A lot has been reported lately about the Ventura County Santa Monica-Sierra Madre Wildlife Corridor in which we are located. Mountain lions, bobcats, deer, etc. are frequently seen in our neighborhood. If the City of Camarillo adopts the Corridor as did Moorpark, we would officially be inside this protected area.

Several years ago, the Conejo Creek housing project was defeated which is also next to our neighborhood. A study was conducted of the wildlife and endangered species on that property and several species of endangered wildlife and plants were discovered to be thriving on that property (Attach08) and (Attach09). There is no reason to believe the same species make Camarillo Springs their home as well. Please have a careful and detailed study done within our neighborhood by the appropriate authorities.

Brian Morris

www.opposecamspringsbuilding.com

805-484-1299

6196 Corte Antigua Camarillo, CA 93012

Website Links:

- (Link01) <http://www.opposecamspringsbuilding.com/>
- (Link02) <https://trackingcalifornia.org/pesticides/pesticide-mapping-tool>
- (Link03) <https://maps.conservation.ca.gov/doggr/wellfinder/#/-118.99202/34.20325/15>
- (Link04) <https://www.latimes.com/archives/la-xpm-1986-03-03-me-14855-story.html>
- (Link05) <https://www.nature.org/en-us/explore/magazine/>
- (Link06) <http://www.natureconservancy.ca/en/where-we-work/newfoundland-and-labrador/news/protect-wetlands-help-fight.html>
- (Link07) <https://californiansagainstfracking.org/a-marina-del-rey-oil-well-blew-up-it-took-a-week-for-officials-to-notify-neighbors/>
- (Link08) https://www.biologicaldiversity.org/species/birds/least_Bells_vireo/index.html

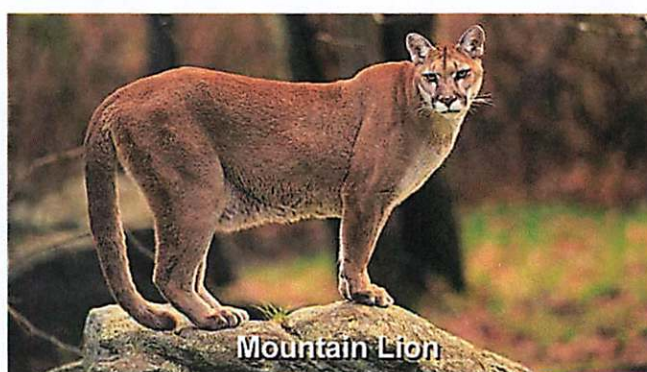
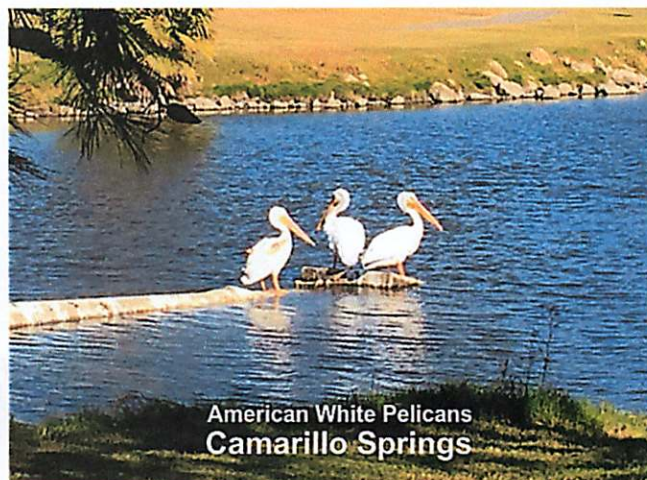
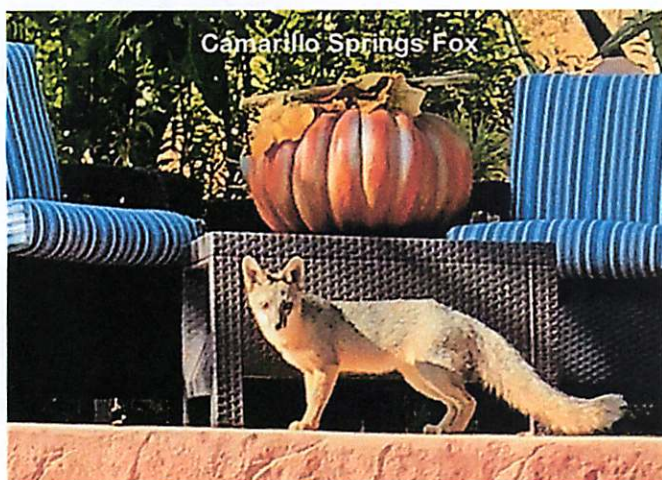
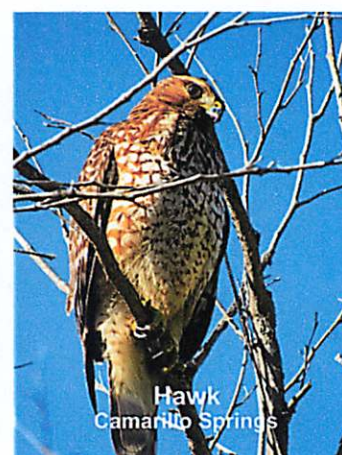
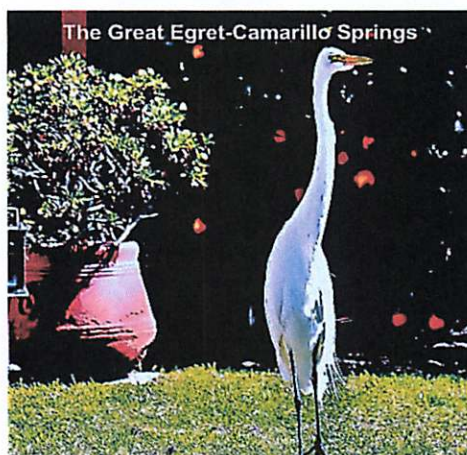
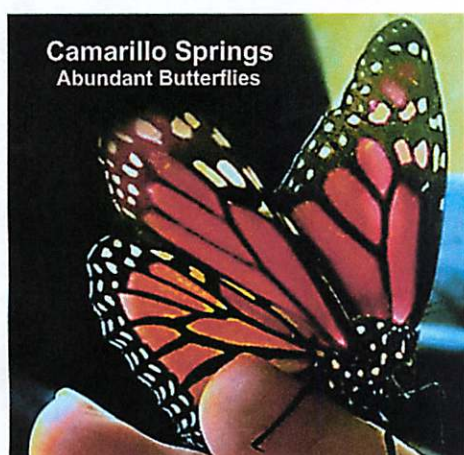
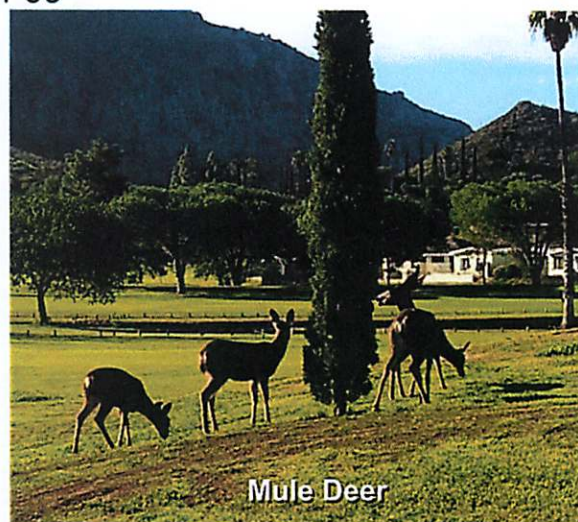
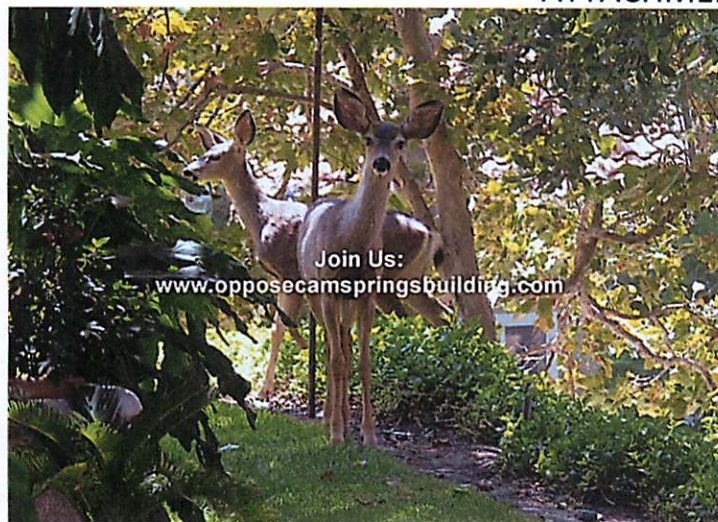
Contacts:

- (Contact01) Chumash Tribal Chair: Julie Tumamait (805)701-6152 jtumamait@hotmail.com
- (Contact02) Conservation Dept. CSUCI Shawn Andersen 805-437-8984
- (Contact03) Ventura County DOGGR 805-937-7246.
- (Contact04) Oppose Camarillo Springs Building – Brian Morris – 805-484-1299 – brianmorris@dslextrreme.com

Attachments:

- (Attach01) View of lake from 57 Margarita
- (Attach02) Latest NUWI Golf Course Plan
- (Attach03) History East Ventura County Rainfall
- (Attach04) USACOE Rainfall History
- (Attach05) One of several NUWI two story home plans
- (Attach06) Wildlife Photo Collage
- (Attach07) Subsidence article
- (Attach08) Letter-Dept. of Interior regarding Conejo Creek Project's Endangered Species 10/18/09
- (Attach09) Letter-Dept. of Interior regarding Conejo Creek Project's Endangered Species 09/10/12

ATTACHMENT 06



ATTACHMENT 08

Guidelines for Conducting and Reporting Botanical Inventories for Federally Listed, Proposed and Candidate Plants

These guidelines describe protocols for conducting botanical inventories for federally listed, proposed and candidate plants, and describe minimum standards for reporting results. The Service will use, in part, the information outlined below in determining whether the project under consideration may affect any listed, proposed, or candidate plants, and in determining the direct, indirect, and cumulative effects.

Field inventories should be conducted in a manner that will locate listed, proposed, or candidate species (target species) that may be present. The entire project area requires a botanical inventory, except developed agricultural lands. The field investigator(s) should:

1. Conduct inventories at the appropriate times of year when target species are present and identifiable. Inventories will include all potential habitats. Multiple site visits during a field season may be necessary to make observations during the appropriate phenological stage of all target species.
2. If available, use a regional or local reference population to obtain a visual image of the target species and associated habitat(s). If access to reference populations(s) is not available, investigators should study specimens from local herbaria.
3. List every species observed and compile a comprehensive list of vascular plants for the entire project site. Vascular plants need to be identified to a taxonomic level which allows rarity to be determined.
4. Report results of botanical field inventories that include:
 - a. a description of the biological setting, including plant community, topography, soils, potential habitat of target species, and an evaluation of environmental conditions, such as timing or quantity of rainfall, which may influence the performance and expression of target species
 - b. a map of project location showing scale, orientation, project boundaries, parcel size, and map quadrangle name
 - c. survey dates and survey methodology(ies)
 - d. if a reference population is available, provide a written narrative describing the target species reference population(s) used, and date(s) when observations were made
 - e. a comprehensive list of all vascular plants occurring on the project site for each habitat type
 - f. current and historic land uses of the habitat(s) and degree of site alteration
 - g. presence of target species off-site on adjacent parcels, if known
 - h. an assessment of the biological significance or ecological quality of the project site in a local and regional context
5. If target species is (are) found, report results that additionally include:
 - a. a map showing federally listed, proposed and candidate species distribution as they relate to the proposed project
 - b. if target species is (are) associated with wetlands, a description of the direction and integrity of flow of surface hydrology. If target species is (are) affected by adjacent off-site hydrological influences, describe these factors.

ATTACHMENT 08



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Ventura Fish and Wildlife Office
2493 Portola Road, Suite B
Ventura, California 93003



IN REPLY REFER TO:
2010-CPA-0019

November 18, 2009

Bob Burrow, AICP
Director of Community Development
City of Camarillo
601 Carmen Drive
Camarillo, California 93010

Subject: Notice of Preparation of an Environmental Impact Report for the Conejo Creek Properties Specific Plan, Ventura County, California

Dear Mr. Burrow:

This letter responds to your request for comments on the Notice of Preparation of an Environmental Impact Report (EIR) for the Conejo Creek Properties Specific Plan (Plan). The Notice of Preparation (NOP) was received in our office on November 5, 2009. The Plan area encompasses 740 acres bounded by the US 101, Pleasant Valley Road, Calleguas Creek and Conejo Creek in the southeast portion of the city of Camarillo, Ventura County, California.

As summarized from the NOP, the proposed Plan contains a conceptual land use plan, regulations, guidelines, and programs for a series of pedestrian-oriented residential neighborhoods in close proximity to existing and planned employment centers and neighborhood commercial uses. Implementation of the Plan would include the construction of 2,500 residential units, approximately 218 acres of recreation/open spaces uses, 15 acres of institutional uses, 100 acres of industrial uses, and 54 acres of office/commercial and mixed uses.

The U.S. Fish and Wildlife Service (Service) responsibilities include administering the Endangered Species Act of 1973, as amended (Act), including sections 7, 9, and 10. Section 9 of the Act and its implementing regulations prohibits the taking of any federally listed endangered or threatened species. Section 3(18) of the Act defines take to mean to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct. Service regulations (50 CFR 17.3) define harm to include significant habitat modification or degradation which actually kills or injures wildlife by significantly impairing essential behavioral patterns, including breeding, feeding or sheltering. Harassment is defined by the Service as an intentional or negligent action that creates the likelihood of injury to wildlife by annoying it to such an extent as to significantly disrupt normal behavioral patterns which include, but are not limited to breeding, feeding, or sheltering. The Act provides for civil and criminal penalties for the unlawful taking of listed species.

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Bob Burrow

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Exemptions to the prohibitions against take in the Act may be obtained through coordination with the Service in two ways. If a project is to be funded, authorized, or carried out by a Federal agency and may affect a listed species, the Federal agency must consult with the Service, pursuant to section 7(a)(2) of the Act. If the proposed project does not involve a Federal agency, but may result in the take of a listed animal species, the project proponent should apply to the Service for an incidental take permit, pursuant to section 10(a)(1)(B) of the Act. To qualify for the permit, you would need to submit an application to the Service together with a habitat conservation plan (HCP) that describes, among other things, how the impacts of the proposed taking of federally listed species would be minimized and mitigated and how the plan would be funded. A complete description of the requirements for a HCP can be found at 50 CFR 17.32.

From the information presented in the NOP and Initial Study for the Camarillo Conejo Creek Properties Specific Plan, we are unable to determine if the proposed Plan would substantially affect federally listed or candidate species that could occur on the project site. To assist the Service in adequately evaluating the proposed project from the standpoint of fish and wildlife protection, we offer the following comments and recommendations:

Federally listed species:

1. We recommend that a botanical survey of the proposed project site be conducted in spring when both annual and perennial plant species are detectable. This survey should include focused searches for the federally endangered Branton's milk-vetch (*Astragalus brauntonii*), and Lyon's pentachaeta (*pentachaeta lyonii*); and the threatened Marcescent dudleya (*Dudleya cymosa marcescens*), Conejo dudleya (*Dudleya abramsii* ssp. *parva*), and Verity's dudleya (*Dudleya verity*). We are enclosing a copy of the Service's guidelines for conducting and reporting botanical inventories for federally listed, proposed, and candidate plants. Our records indicate that Verity's dudleya occurs less than 0.1 mile from the project site, near the intersection of Howard Road and Sanitation Road. Additionally, Conejo dudleya has been identified approximately 0.5 mile to east of the proposed project site, off Camarillo Springs Road.
2. The EIR should identify the plant communities that exist in the vicinity of the project site. Coastal sage scrub and cactus scrub plant communities provide suitable habitat for the federally threatened coastal California gnatcatcher (*Poliophtila californica californica*). The coastal California gnatcatcher has recently been observed by Service biologists at California State University Channel Islands, approximately 2.5 miles southwest of the proposed project site. If coastal sage scrub or cactus scrub habitat exists on site, the EIR should specify if the vegetation would be affected directly or indirectly by the proposed project. In addition, surveys according to Service protocol should be conducted for the coastal California gnatcatcher where this vegetation occurs. This will help the Service to evaluate the likelihood that the coastal California gnatcatcher may be affected by the proposed project.
3. The federally endangered least Bell's vireo (*Vireo bellii pusillus*) is known to occur at the project site, near the intersection of Howard Road and Sanitation Road in Conejo Creek. Least Bell's vireos have also been observed at the California State University Channel Islands campus.

Potential impacts:

1. Construction along Conejo or Calleguas Creek, discharge of nuisance water from lands within the Plan area into the creeks, or the construction of the bypass channel within Conejo Creek may fall within the U.S. Army Corp's of Engineer's (Corps) jurisdiction. We recommend that you work with the Corps to determine if consultation pursuant to section 7 of the Act for potential adverse effects to listed species is warranted.
2. We have concerns that the proposed Plan may affect riparian and coastal sage scrub habitat for the coastal California gnatcatcher and least Bell's vireo by construction related noise, dust, lighting, and activity, in addition to increased use of the area as a result of the future development. For example, lighting of park facilities, sports fields, parking lots, or residential properties located along Conejo or Calleguas creeks may

ATTACHMENT 08

- c. the target species phenology and microhabitat, an estimate of the number of individuals of each target species per unit area; identify areas of high, medium and low density of target species over the project site, and provide acres of occupied habitat of target species. Investigators could provide color slides, photos or color copies of photos of target species or representative habitats to support information or descriptions contained in reports.
 - d. the degree of impact(s), if any, of the proposed project as it relates to the potential unoccupied habitat of target habitat.
- 6. Document findings of target species by completing California Native Species Field Survey Form(s) and submit form(s) to the Natural Diversity Data Base. Documentation of determinations and/or voucher specimens may be useful in cases of taxonomic ambiguities, habitat or range extensions.
- 7. Report as an addendum to the original survey, any change in abundance and distribution of target plants in subsequent years. Project sites with inventories older than 3 years from the current date of project proposal submission will likely need an additional survey. Investigators need to assess whether an additional survey(s) is (are) needed.
- 8. Adverse conditions may prevent investigator(s) from determining presence or identifying some target species in potential habitat(s) of target species. Disease, drought, predation, or herbivory may preclude the presence or identification of target species in any year. An additional botanical inventory(ies) in a subsequent year(s) may be required if adverse conditions occur in a potential habitat(s). Investigator(s) may need to discuss such conditions.
- 9. Guidance from California Department of Fish and Game (CDFG) regarding plant and plant community surveys can be found in Guidelines for Assessing the Effects of Proposed Developments on Rare and Endangered Plants and Plant Communities, 1984. Please contact the CDFG Regional Office for questions regarding the CDFG guidelines and for assistance in determining any applicable State regulatory requirements.

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Bob Burrow

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If you have any questions regarding this matter, please contact Colleen Mehlberg of our staff at (805) 644-1766, extension 221.

Sincerely,

/s/: Chris Dellith

Chris Dellith
Senior Biologist

Enclosure

cc:

Dan Blankenship, California Department of Fish and Game

adversely impact the quality of the surrounding habitat for the least Bell's vireo and coastal California gnatcatcher.

3. With the information provided, it is unclear how the proposed bypass channel of Conejo Creek would affect the riparian vegetation that surrounds the creek in its current location. This vegetation provides breeding, roosting, and foraging habitat for the least Bell's vireo. In addition, the EIR should identify where the bypass channel will receive its water.
4. Page 17 of the Initial Study states that the Plan "could result in the discharge of pollutants into surface or ground water sources, including Calleguas Creek and Conejo Creek". Project-related material releases into the riparian area or water may negatively affect the quality of the habitat for the least Bell's vireo by killing native plants used for nesting or foraging. To reduce or eliminate such effects, we recommend you identify measures in the Plan, including best management practices, to control runoff and sedimentation.
5. Development of the Plan area may cause two problems related to predation. The first is the introduction of non-native predators, specifically cats (*Felis domesticus*). Cats are known to have a great impact on native animals, especially birds. The presence of cats extends the negative effects of the development well into adjacent habitat and could eliminate any nesting attempts by coastal California gnatcatchers or least Bell's vireos in the future, even if the habitat adjacent to the Plan area is preserved. Domestic cats and other pets could be introduced to the project area by workers during construction, or by future residents of the Plan area.
6. Residential development may result in the control of native predators, such as coyotes (*Canis latrans*). Coyotes are known to suppress the population of smaller predators, such as cats, grey foxes (*Urocyon cinereoargenteus*), and opossums (*Didelphis virginianus*) that prey upon nesting birds. In the absence of coyotes, populations of these smaller predators may increase, and native birds that nest in coastal sage scrub or the riparian corridor, including the coastal California gnatcatcher and least Bell's vireo, may decline or be eliminated.
7. Trash left during or after project activities could attract predators to work sites, which could, in turn, prey on coastal California gnatcatchers or least Bell's vireos. For example, raccoons (*Procyon lotor*) are attracted to trash and also prey opportunistically on listed species.
8. Housing development introduces a suite of other indirect effects. These include night lighting, noise, introduction of non-native plants, and potential contamination by pesticides used by residents. Suitable habitat in adjacent areas could be accessed by off-road vehicles via the project site during and after project development, or by pedestrians via the proposed public access trail network. Off-road vehicle and other recreational activities could physically destroy otherwise suitable habitat by creating new trails through vegetation. The combined impact of these effects will be to reduce the suitability of the habitat for coastal California gnatcatchers and least Bell's vireo in the surrounding area.

Based on our conservation responsibilities and management authority for migratory birds under the Migratory Bird Treaty Act (MBTA) of 1918, as amended (16 U.S.C. 703 *et seq.*), we are concerned about potential impacts the proposed project may have on migratory birds in the area. Under the MBTA, nests (nests with eggs or young) of migratory birds may not be harmed, nor may migratory birds be killed. Such destruction may be in violation of the MBTA. Therefore, we recommend a qualified biologist survey the area for nests prior to land clearing. If nests are located, or if other evidence of nesting (i.e., mated pairs, territorial defense, carrying nesting material, transporting food) is observed, a protective buffer (the size depending on the habitat requirements of the species) should be delineated and the entire area avoided to prevent destruction or disturbance to nests until they are no longer active.

Lastly, we recommend that you review information in the California Department of Fish and Game's (CDFG) Natural Diversity Data Base and that you contact the CDFG at (916) 324-3812 for information on other species of concern that may occur in this area. We appreciate the opportunity to provide comments on the proposed Plan and look forward to working with you in the future.

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United States Department of the Interior

FISH AND WILDLIFE SERVICE
Ventura Fish and Wildlife Office
2493 Portola Road, Suite B
Ventura, California 93003



IN REPLY REFER TO:
08EVEN00-2012-CPA-0151

September 10, 2012

Robert Burrow, Director
Department of Community Development
City of Camarillo
601 Carmen Drive
Camarillo, California 93010

Subject: Notice of Availability of a Draft Environmental Impact Report for the Conejo Creek Properties Specific Plan, City of Camarillo, Ventura County, California

Dear Mr. Burrow:

We are responding to your notice, received in our office on July 24, 2012, informing us that the City of Camarillo (City) has completed a Draft Environmental Impact Report (DEIR) for the proposed Conejo Creek Properties Specific Plan (project). The proposed project encompasses 740 acres bounded by the Ventura Freeway (US 101), Pleasant Valley Road, Calleguas Creek and Conejo Creek in the southeast portion of the city of Camarillo, California.

The U.S. Fish and Wildlife Service (Service) responsibilities include administering the Endangered Species Act of 1973, as amended (Act), including sections 7, 9, and 10. Section 9 of the Act and its implementing regulations prohibits the taking of any federally listed endangered or threatened species. Section 3(19) of the Act defines take to mean to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct. Service regulations (50 CFR 17.3) define harm to include significant habitat modification or degradation which actually kills or injures wildlife by significantly impairing essential behavioral patterns, including breeding, feeding or sheltering. Harassment is defined by the Service as an intentional or negligent action that creates the likelihood of injury to wildlife by annoying it to such an extent as to significantly disrupt normal behavioral patterns which include, but are not limited to breeding, feeding, or sheltering. The Act provides for civil and criminal penalties for the unlawful taking of listed species.

Exemptions to the prohibitions against take in the Act may be obtained through coordination with the Service in two ways. If a project is to be funded, authorized, or carried out by a Federal agency and may affect a listed species, the Federal agency must consult with the Service, pursuant to section 7(a)(2) of the Act. If the proposed project does not involve a Federal agency, but may result in the take of a listed animal species, the project proponent should apply to the Service for an incidental take permit, pursuant to section 10(a)(1)(B) of the Act. To qualify for the permit, you would need to submit an application to the Service together with a habitat

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Robert Burrow

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conservation plan (HCP) that describes, among other things, how the impacts of the proposed taking of federally listed species would be minimized and mitigated and how the plan would be funded. A complete description of the requirements for a HCP can be found at 50 CFR 17.32 or our website (<http://www.fws.gov/ventura>).

On November 18, 2009, we sent you a comment letter (enclosed) stating our concerns regarding the proposed project. We believe our comments and concerns, as stated in our November 18, 2009, letter regarding the effects of the proposed project on federally-listed species, which include the endangered least Bell's vireo (*Vireo bellii pusillus*), Braunton's milk-vetch (*Astragalus brauntonii*), and Lyon's pentachaeta (*Pentachaeta lyonii*), and the threatened California gnatcatcher (*Polioptila californica californica*), Marcescent dudleya (*Dudleya cymosa marcescens*), Conejo dudleya (*Dudleya abramsii* ssp. *parva*), and Verity's dudleya (*Dudleya verity*), remain relevant and applicable. The effects of the proposed project on these wildlife species may constitute "take" as defined in Section 3(19) of the Act.

Based on the information in the DEIR, the extent of Federal involvement in the proposed project is unclear. We recommend that you seek an incidental take permit through the habitat conservation planning process, pursuant to section 10(a)(1)(B) of the Act, for all aspects of the proposed project where there is no federal nexus and the project may result in take of federally-listed wildlife species. Due to the complexity of the proposed project and the listed species involved, we emphasize that the process of developing a HCP and application for an incidental take permit could take a considerable amount of time; therefore, the project proponent should begin this process as soon as possible.

Please note that despite the incorporation of any mitigation measures developed pursuant to the California Environmental Quality Act (CEQA), any take of listed wildlife species that would result from implementation of the proposed project would require an exemption to the prohibitions against take. Significant impacts as defined under CEQA do not necessarily equate to "take" as defined in Section 3(19) of the Act, nor do mitigation measures that reduce CEQA impacts to less-than-significant levels necessarily satisfy the need for an applicant to minimize and mitigate the effects of such take under the Act. For example, regarding the coastal California gnatcatcher, page 4.4-28 of the DEIR states, "Avoidance measures may include restricting development to the non-breeding season..." As the coastal California gnatcatcher is a resident species to the local area, working outside the breeding season would not completely avoid adverse impacts to the species, if present onsite.

We appreciate the opportunity to provide comments on the proposed project and look forward to working with the City and project applicant to ensure compliance with the Act. If you have any

ATTACHMENT 09

Robert Burrow

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questions regarding this matter, please contact Colleen Mehlberg of my staff at (805) 644-1766, extension 221.

Sincerely,

/s/: Stephen P. Henry

Diane Noda
Field Supervisor

Enclosure

cc:
Dan Blankenship, California Department of Fish and Game

**Considerations for the Draft Environmental Impact Report (EIR) for the
Camarillo Springs General Plan Amendment (GPA) 2017-2, Change of
Zone 327, Tentative Tract Map 6016, Residential Planned Development
Permit and Modifications to Special Use Permit 6**

Submitted by:

**Barbara Williams
1161 Belleza Street
Camarillo, CA 93012
Located in Camarillo Springs
(805) 340-6404
Email: [http://barbsk80@verizon.net](mailto:barbsk80@verizon.net)**

I would like for the City of Camarillo and New Urban West to address in the Draft Environmental Impact Report (EIR) for the Camarillo Springs General Plan Amendment (GPA) 2017-2 to include the impact to the Ventura County Santa Monica – Sierra Madre Wildlife Corridor that includes the Camarillo Springs Golf Course. See Figure 1. Not only is the Camarillo Springs Golf Course part of a critical wildlife corridor, it is also a habitat for many species of animals, some of which are protected, endangered, or threatened. To develop our beautiful open space will impact the wildlife that we enjoy and coexist with every day.

The County has no land use authority within cities and areas like the Camarillo Springs Golf Course were excluded from the ordinances that protects wildlife corridors within Ventura County in the final draft with the expectation the City of Camarillo would protect the portion of the wildlife corridor with their city limits. Ventura County Wildlife Corridors as defined and protected via Ordinances 4537 and 4539 were designed to protect the movement of wildlife throughout Ventura County. Movement by the wildlife throughout the corridor is essential to their survival because:

- Animals must find food and shelter and offspring must establish new home ranges
- Isolated populations may survive for a limited time, but will be vulnerable to die-off due to diseases, periodic loss of food resources, and inbreeding
- Preservation of biological resources requires that plant and animal species be able to successfully move through the areas of the county that contain the habitats they depend on

More information may be found at the following Link:

<https://docs.vcrma.org/images/pdf/planning/conservation/HWCW/Enitire-PL16-0127.pdf>

Figure 1. Santa Monica – Sierra Madre Wildlife Corridor

Development of the Camarillo Springs Golf Course will imperil wildlife populations and create direct impediments to wildlife movement north of US 101 via Conejo Creek. The developer plans to build their homes on a "plateau" and then build barriers along Ridgeview to supposedly keep overflow from Conejo Creek through the fields to the golf course area. In reality it will prohibit wildlife from using Conejo Creek to continue north through the wildlife corridor. While the golf course does have fencing along Ridgeview that could impact animal migration, there are a number of areas in the western end when there are openings they can travel through.

There are a number of species of wildlife living in around the Camarillo Springs Golf Course. The most common wildlife in the Camarillo Springs area to include the golf course are:

Large/Medium Mammals	Rodents/Small Mammals	Birds	Reptiles
<u>Coyotes</u> - common	<u>Squirrels</u> - common	<u>Owls</u> - common	<u>Lizards</u> - common
<u>Raccoons</u> - common	<u>Gophers</u> - common	<u>Hawks</u> - common	<u>Snakes</u> - common
<u>Opossum</u> - common	<u>Mice</u> - common	<u>Song birds</u> - common	
<u>Bobcats</u> - occasional	<u>Woodrats</u> - common	<u>Hummingbirds</u> - common	
<u>Skunks</u> - occasional	<u>Black Rats</u> - common	<u>Ducks</u> - common	
<u>Mountain Lions</u> - rare	<u>European Rats</u> - common		
	<u>Rabbits</u> - common		

Source: <https://www.nps.gov/samo/learn/management/urban-wildlife.htm>

Endangered and threatened species were found in the area around Conejo Creek and Camarillo Springs during the Conejo Creek Development studies in preparation for their Draft EIR. The following endangered and threatened species are:

- Endangered
 - Least Bell's Vireo (*Vireo bellii pusillus*)
 - Branton's Milk-Vetch (*Astragalus brauntonii*)
 - Lyon's Pentachaeta (*Pentachaeta lyonii*)



**Figure 2. Locations of the Mountain Lions In the Vicinity of Camarillo Springs
(Camarillo Springs Golf Course Area contained in RED circle)**

To develop the golf course would impact the geese and mountains as well as all of the other wildlife that make the golf course their home. These wildlife depend upon the green space created by the golf course for their survival. For the migratory wildlife like the Canadian Geese, it will impact where they travel and could impact survivability since they would not know where else to go from their historical homes. The minute any development effort on the golf course is begun, the wildlife will leave. For the years it takes to develop the homes, many wildlife will leave and be confused as to where it is safe for them to live. It is important that we don't change their habitats any more to ensure they can raise their young and teach them how to hunt and find food for themselves.

Additional Concerns

During the development of the Draft EIR for the Conejo Creek Development, which was not approved by the Camarillo City Council, it was discovered there were residual carcinogens in the soil. Of great concern was residual DDT. The Camarillo Springs Golf Course was built on farmland that was contiguous to the farmland proposed for development in the Conejo Creek Project. According to the Centers for Disease Control, DDT will last in the soil for 100's of years and cannot be removed at this time. To disturb the soil at the golf course, which was built before any homes were built, would place carcinogens in the air and with the prevailing westerly winds, it would go into our homes in Camarillo Springs. More than half of the community is seniors, who are susceptible to those carcinogens and could cause cancer or lung illnesses. DDT exposure has been tied to Parkinson's Disease. Studies have shown that DDT is supposed to be a suppressant of the immune system and can cause both Alzheimers and Parkinson's Disease.