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February 6, 2020

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Resource Management Agency Planning
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Subject: Coastal Planned Development (PD) Permit for Bandi Access Road, Case No. PL17-0130, SCH #2020019026, Ventura County

Dear Mr. Torres:

The California Department of Fish and Wildlife (CDFW) has reviewed the above-referenced Coastal Planned Development (PD) Permit for Bandi Access Road, Case No. PL17-0130 (Project). The Site Plan Review's supporting documentation includes an *Initial Study Biological Assessment 10112 Yellow Road Development Project Malibu, Ventura County (Assessment)*. Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW's Role

CDFW is California's Trustee Agency for fish and wildlife resources, and holds those resources in trust by statute for all the people of the State [Fish & Game Code, §§ 711.7, subdivision (a) & 1802; Public Resources Code, § 21070; California Environmental Quality Act (CEQA) Guidelines, § 15386, subdivision (a)]. CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect state fish and wildlife resources.

CDFW is also submitting comments as a Responsible Agency under CEQA (Public Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code, including lake and streambed alteration regulatory authority (Fish & Game Code, § 1600 et seq.). Likewise, to the extent implementation of the Project as proposed may result in "take", as defined by state law, of any species protected under the California Endangered Species Act (CESA) (Fish & Game Code, § 2050 et seq.), or state-listed rare plant pursuant to the Native Plant Protection Act (NPPA; Fish & Game Code, §1900 et seq.) authorization as provided by the applicable Fish and Game Code will be required.

Project Description and Summary

Objective: The proposed Project is to construct a private driveway in Ventura County (County) to access a proposed single-family dwelling located on APN 4472-016-004 (addressed as 10112 Yellow Hill Road) in Los Angeles County, immediately across the County line. The new access driveway will begin at APN 700-0-030-095 and would be located within an existing 60-foot wide access easement. The private driveway would then pass into APNs 700-0-030-055 and 700-0-030-115 and would be located within a new 40-foot access easement. The total length of the driveway is approximately 1,520 feet; however, only 1,305 linear feet is within the unincorporated area of Ventura County, while the remaining 215 linear feet ends across the Los Angeles County line.

Location: The subject property is located in the Santa Monica Mountains area of unincorporated Ventura County. The Tax Assessor's parcel numbers (APN) that constitute the Project site are 700-0-030-095 (39 acres), 700-0-030-055 (4 acres), and 700-0-030-115 (32 acres). An approximately one-quarter mile long, unpaved access driveway connects the proposed building pad with 2 Yellow Hill Road to the northeast. The access driveway will extend through Los Angeles County and Ventura County. The proposed location of the single-family dwelling would be located on a graded area, downslope from Yellow Hill Road in Los Angeles County immediately across the County line. The Project site is located in steep terrain in a relatively undeveloped area of the Santa Monica Mountains along a predominantly southeast-facing mountainside that overlooks Arroyo Sequit Canyon. The Project site is situated below the ridgeline separating Arroyo Sequit Canyon from Little Sycamore Canyon to the west.

Comments and Recommendations

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

Comments on Post-Wildfire Site Condition

Comment #1: Biological Surveys

Issue: CDFW acknowledges that the Project has utilized recent biological surveys from April 2018 to June 2018; however, it is especially relevant to recognize that the Project site conditions have changed due to the occurrence of the Woolsey fire (November 2018). The Initial Study states, "The parcel currently exhibits features typical of post-fire conditions, consisting of a landscape with charred remains of vegetation and soils, and predominately denuded of vegetation."

Specific impacts: The biological surveys conducted for the Assessment no longer represent the current state of the Project site and the inventory of biological species that may be present.

Why impact would occur: Project implementation includes grading, vegetation clearing, road

construction, road maintenance, and other activities that may result in direct mortality, population declines, or local extirpation of sensitive plant and wildlife species. Impacts to species not previously known or identified to be on the Project site or within its vicinity have the possibility to occur.

Evidence impact would be significant: Fire is a natural and essential part of the life cycle of the plant communities of the Santa Monica Mountains. Slopes that formerly supported dense chaparral shrubs are known to bloom annual species in the spring following a fire. These annuals play an important role in helping protect vulnerable chaparral slopes from erosion following fires when little regrowth of shrubs has occurred (Rundel, P.W. & Gustafson, R. 2005).

In addition, the heat of fires helps stimulate long-lived seeds often found in the soil beneath canopies. Several short-lived shrubs and semi-woody species can become established in large numbers after fire from seed stored in the soil. One such species that has been found to be significant in areas post-fire is deerweed (*Acmispon glaber*). Although not an Environmentally Sensitive Habitat Area (ESHA), the abundance of deerweed is significant because it adds large amounts of nitrogen to chaparral soils that have often lost this element in gases released by the heat of fire. Without deerweed to supply this nitrogen, frequent fires could deplete the amount of nitrogen available for plants in soil (Rundel, P.W. & Gustafson, R. 2005). The Assessment indicated the presence of deerweed shrubland alliance found on previously graded and filled areas of the Project site, so it is known to be located on the Project site.

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #1: Although the Project site currently exhibits features typical of a post-fire condition, with charred remains of vegetation, soils, and predominately denuded of vegetation, there is a possibility that some species have already started to recover. CDFW recommends that updated botanical and wildlife surveys be conducted to inform impact assessments, avoidance, minimization, and mitigation measures in the Biological Assessment. Focused surveys for sensitive/rare plants on-site that may have been stimulated to germinate post fire should be disclosed in the CEQA document. Based on the *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities* (CDFW, 2018), a qualified biologist should "conduct botanical surveys in the field at the times of year when plants will be both evident and identifiable. Usually this is during flowering or fruiting." The final CEQA documentation should provide a thorough discussion on the presence/absence of sensitive plants on-site and identify measures to protect sensitive plant communities from Project-related direct and indirect impacts.

Mitigation Measure #2: CDFW requests to be informed regarding any potential changes or amendments to the current mitigation measures presented in the Project. As the Project site is mostly denude of vegetation, it is essential to recognize that the seed bank, underground root crowns, or underground stems often found in chaparral species may allow baseline to eventually recover and the vegetation that existed previously should still require mitigation.

Comment #2: Impacts to Streams

Issue: The Assessment states, "Several high-gradient ephemeral rocky drainage bottoms fed by seasonal storm runoff occur within 300 feet of the construction footprint, but none displayed saturated soils, a definable bed or bank, or associated riparian plant species." However, a

review of aerial imagery and USGS National Map Viewer indicates that the Project area crosses at least two ephemeral streams. In addition, The Project is located in a significant burn area that is likely to experience elevated stormwater flows due to reduced groundcover and increased above ground flow in the surrounding area. Project activities may result in the deposition of materials and alterations of ephemeral streams. The Project, therefore, may be subject to notification under Fish and Game Code section 1600 *et seq.*

Specific impacts: The Project may result in the loss of ephemeral streams and associated watershed function and biological diversity. Grading and construction activities will likely alter the topography, and thus the hydrology, of the Project site.

Why impacts would occur: Ground disturbing activities from grading, filling, and water diversions would physically remove or otherwise alter existing streams or their function and associated habitat on the Project site. Downstream streams and associated biological resources beyond the Project development footprint may also be impacted by Project related releases of sediment and altered watershed effects resulting from Project activities.

Evidence impacts would be significant: The Project may substantially adversely affect the existing stream pattern on the Project site through the alteration or diversion of a stream, which absent specific mitigation, could result in substantial erosion or siltation on site or off site of the Project. In addition, the presence of vegetation such as Plummer's mariposa lily, indicates presence of an ephemeral source of water. The areas around the Project site contains ephemeral drainages and this species is found primarily on gravelly alluvial fans and sage scrub slopes (Clarke, O.F. et al. 2007). Alluvial fans are deposits of water-transported material, indicating that surface water flows within the Project site.

Water diversions can impact flow regimes, decreasing the frequency of high flows. Prolonged low flows can cause streams to become graded and cause channels to become disconnected from floodplains (Poff et al. 1997). This process decreases available habitat for aquatic species including fish that utilize floodplains for nursery grounds. Undersized culverts and other stream crossings can also cause downstream channel erosion and tributary head-cutting, reduced magnitude and frequency of high flows, channel narrowing, and reduced formation of secondary channels and oxbows (Poff et al. 1997). Additionally, these structures can degrade water quality and associated wildlife habitats (Santucci, Jr. et al. 2005). Streams with such structures can have reduced abundance of anurans due to decreased availability of breeding habitat (Eskew et al. 2012). Based on the foregoing, Project impacts may substantially adversely affect the existing stream pattern and associated habitat of the Project site.

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #1: Impacts from the Woolsey fire and subsequent rainy seasons could have altered drainage patterns in the Project area. CDFW recommends a hydrogeomorphology study be conducted to evaluate the impacts of elevated flows of water and sediment through ephemeral drainages within a recently burned watershed.

Mitigation Measure #2: The Project may result in the alteration of streams. For any such activities, the Project applicant (or "entity") must provide written notification to CDFW pursuant to section 1600 *et seq.* of the Fish and Game Code. Based on this notification and other information, CDFW determines whether a Lake and Streambed Alteration Agreement (LSA) with

the applicant is required prior to conducting the proposed activities. A notification package for a LSA may be obtained by accessing CDFW's web site at www.wildlife.ca.gov/habcon/1600.

CDFW's issuance of an LSA for a Project that is subject to CEQA will require CEQA compliance actions by CDFW as a Responsible Agency. As a Responsible Agency, CDFW may consider the CEQA document of the Lead Agency for the Project. To minimize additional requirements by CDFW pursuant to section 1600 *et seq.* and/or under CEQA, the CEQA document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the LSA.

Mitigation Measure #3: Any LSA Agreement issued for the Project by CDFW may include additional measures protective of streambeds on and downstream of the Project. The LSA may include further erosion and pollution control measures. To compensate for any on-site and off-site impacts to riparian resources, additional mitigation conditioned in any LSA may include the following: avoidance of resources, on-site or off-site creation, enhancement or restoration, and/or protection and management of mitigation lands in perpetuity.

Mitigation Measure #4: CDFW recommends the Project proponent actively implement Best Management Practices (BMPs) to prevent erosion and the discharge of sediment and pollutants into ephemeral stream beds during Project activities. BMPs shall be monitored and repaired, if necessary, to ensure maximum erosion, sediment, and pollution control. The Project proponent shall prohibit the use of erosion control materials potentially harmful to fish and wildlife species, such as mono-filament netting (erosion control matting) or similar material, within stream areas. All fiber rolls, straw wattles, and/or hay bales utilized within and adjacent to the Project site shall be free of nonnative plant materials. Fiber rolls or erosion control mesh shall be made of loose-weave mesh that is not fused at the intersections of the weave, such as jute, or coconut (coir) fiber, or other projects without welded weaves. Non-welded weaves reduce entanglement risks to wildlife by allowing animals to push through the weave, which expands when spread.

Comments on Pre-Wildfire Site Condition

Comment #3: Impacts to nesting birds

Issue: The Assessment indicates that three special status bird species were observed during the surveys. These special status bird species included the following: Southern California rufous-crowned sparrow *(Aimophila ruficeps canescens*), oak titmouse *(Baeolophus inornatus)*, and Costa's hummingbird *(Calypte costae)*. The Assessment also states, "the survey area supports high-quality nesting habitat for birds."

Specific impacts: Construction during the breeding season of nesting birds could result in the incidental loss of fertile eggs or nestlings or otherwise lead to nest abandonment in trees directly adjacent to the Project boundary. The Project could also lead to the loss of foraging habitat for sensitive bird species.

Why impact would occur: Impacts to nesting birds could result from ground disturbing activities. Project disturbance activities could result in mortality or injury to nestlings, as well temporary or long-term loss of suitable foraging habitats. Construction during the breeding

season of nesting birds could result in the incidental loss of breeding success or otherwise lead to nest abandonment.

Evidence impact would be significant: The loss of occupied habitat or reductions in the number of rare bird species, either directly or indirectly through nest abandonment or reproductive suppression, would constitute a significant impact absent appropriate mitigation. Furthermore, nests of all native bird species are protected under state laws and regulations, including Fish and Game Code sections 3503 and 3503.5.

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure: To protect nesting birds that may occur on site or adjacent to the Project boundary, CDFW recommends that no construction shall occur from February 15 through August 31 unless a qualified biologist completes a survey for nesting bird activity within a 500-foot radius of the construction site. The nesting bird surveys should be conducted at appropriate nesting times and concentrate on potential roosting or perch sites. CDFW recommends the Lead Agency require surveys be conducted by a qualified biologist no more than 14 days prior to the beginning of any Project-related activity likely to impact raptors and migratory songbirds, for the entire Project site. If Project activities are delayed or suspended for more than 14 days during the breeding season, repeat the surveys. If nesting raptors and migratory songbirds are identified, CDFW recommends the following minimum no-disturbance buffers be implemented: 300 feet around active passerine (perching birds and songbirds) nests, 500 feet around active non-listed raptor nests and 0.5 mile around active listed bird nests.

These buffers should be maintained until the breeding season has ended or until a qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or parental care for survival.

Comment #4: Impacts to Candidate Endangered Species – Crotch's Bumble Bee

Issue: Table 3-3 of the Assessment identifies the Project site as adequate habitat for Crotch's bumble bee (*Bombus crotchii*).

Specific Impact: Project ground disturbing activities such as grading and grubbing may result in crushing or filling of active bee colonies, causing the death or injury of adults, eggs, and larvae. The Project may remove bee habitat by eliminating native vegetation that may support essential foraging habitat.

Why Impact would occur: Impacts to Crotch's bumble bee could result from ground disturbing activities. Project disturbance activities could result in mortality or injury to hibernating bees, as well temporary or long-term loss of suitable foraging habitats. Construction during the breeding season of bees could result in the incidental loss of breeding success or otherwise lead to nest abandonment.

Evidence Impact would be significant: On June 12, 2019, CDFW accepted a petition for Crotch's bumble bee as a candidate species for listing under CESA. As a CESA candidate, the species is granted full protection of a threatened or endangered species under CESA. The Project's potential to substantially reduce and adversely modify habitat for Crotch's bumble bee, reduce and potentially seriously impair the viability of populations of Crotch's bumble bee, and

reduce the number and range of the species while taking into account the likelihood that special status species on adjacent and nearby natural lands rely upon the habitat that occurs on the proposed Project site.

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure: Due to potentially suitable habitat within the Project site, within one year prior to vegetation removal and/or grading, a qualified entomologist familiar with the species behavior and life history should conduct surveys to determine the presence/absence of Crotch's bumble bee. Surveys should be conducted during flying season when the species is most likely to be detected above ground, between March 1 to September 1 (Thorp et al. 1983). Survey results including negative findings should be submitted to CDFW prior to initiation of Project activities. If "take" or adverse impacts to Crotch's bumble bee cannot be avoided either during Project activities or over the life of the Project, please be advised that a CESA permit must be obtained (pursuant to Fish & Game Code, § 2080 et seq.).

Comment #5: Impacts to Special-Status Plant Species and Environmentally Sensitive Habitat Areas

Issue: The Assessment states that "an unidentified mariposa-lily... this plant could be Plummer's mariposa-lily." In addition, Table 3-3 of the Assessment identifies adequate habitat onsite for the Plummer's mariposa-lily. In addition, the Initial Study also states, "The proposed development activities in the Ventura County portion (APNs 700-0-030- 095, 700-0-030-055, and 700-0-030-115) include only access road improvements (i.e. driveway) and a 10-foot fuel modification zone on either side of the driveway. Construction of the proposed access road and creation of the fuel modification zones are anticipated to result in the removal of approximately 1.26 acres of native vegetation communities that constitute ESHA."

Specific impact: Plummer's mariposa-lily is identified as California Rare Plant 4.2, limited distribution and fairly threatened in California, as well as a locally important species. CDFW considers plant communities, alliances, and associations with a statewide ranking of S1, S2, S3 and S4 as sensitive and declining at the local and regional level (Sawyer et al. 2008). An S3 ranking indicates there are 21 to 80 occurrences of this community in existence in California, S2 has 6 to 20 occurrences, and S1 has less than 6 occurrences.

The Coastal Act provides a definition of "environmentally sensitive area" as "Any area in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem and which could be easily disturbed or degraded by human activities and developments" (Public Resources Code, § 30107.5). The Project may have direct or indirect effects to such sensitive species.

The Project may cause immediate species injury or death, habitat fragmentation, alteration of soil chemical and physical makeup, increased competition with exotic invasive weeds, and reduced photosynthesis and reproductive capacity. This would result in native plant population declines or local extirpation of special status plant species. The effects of these impacts would be permanent or occur over several years.

Why impact would occur: Project implementation includes grading, vegetation clearing, road construction, road maintenance, and other activities that may result in direct mortality, population declines, or local extirpation of sensitive plant species.

Evidence impact would be significant: Impacts to special status plant species should be considered significant under CEQA unless they are clearly mitigated below a level of significance. Inadequate avoidance, minimization, and mitigation measures for impacts to these sensitive plant species will result in the Project continuing to have a substantial adverse direct, indirect, and cumulative effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or United States Fish and Wildlife Service (USFWS).

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #1: CDFW recommends conducting focused surveys for sensitive/rare plants on-site and disclosing the results in the CEQA document. Based on the *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities* (CDFW, 2018), a qualified biologist should "conduct botanical surveys in the field at the times of year when plants will be both evident and identifiable. Usually this is during flowering or fruiting." The final CEQA documentation should provide a thorough discussion on the presence/absence of sensitive plants on-site and identify measures to protect sensitive plant communities from Project-related direct and indirect impacts.

Mitigation Measure #2: In 2007, the State Legislature required CDFW to develop and maintain a vegetation mapping standard for the state (Fish & Game Code, § 1940). This standard complies with the National Vegetation Classification System, which utilizes alliance and association-based classification of unique vegetation stands. CDFW utilizes vegetation descriptions found in the Manual of California Vegetation (MCV), found online at http://vegetation.cnps.org/. To determine the rarity ranking of vegetation communities on the Project site, the MCV alliance/association community names should be provided as CDFW only tracks rare natural communities using this classification system.

Mitigation Measure #3: CDFW recommends avoiding any sensitive natural communities found on the Project. If avoidance is not feasible, mitigating at a ratio of no less than 5:1 for impacts to S3 ranked communities and 7:1 for S2 communities should be implemented. This ratio is for the acreage and the individual plants that comprise each unique community. All revegetation/restoration areas that will serve as mitigation should include preparation of a restoration plan, to be approved by USFWS and CDFW prior to any ground disturbance. The restoration plan should include restoration and monitoring methods; annual success criteria; contingency actions should success criteria not be met; long-term management and maintenance goals; and, a funding mechanism to assure for in perpetuity management and reporting. Areas proposed as mitigation should have a recorded conservation easement and be dedicated to an entity which has been approved to hold/manage lands (AB 1094; Government Code, §§ 65965-65968).

Comment #6: Impacts to California Species of Special Concern

Issue: Coastal whiptail (*Aspidoscelis tigris stejnegeri)* was observed during biological surveys. In addition, coast patch-nosed snake (*Salvadora hexalepis virgultea*), southern California

legless lizard (*Anniella stebbinsi*), California legless lizard (*Anniella sp.*), San Diego mountain king snake (*Lampropeltis zonata pulchra*), and coast horned lizard (*Phrynosoma blainillii*) are identified as species with a moderate to high potential to occur on site. These reptiles are all California Species of Special Concern (except for the mountain king snake) and were identified in the Assessment as having affected habitat as a result of Project activities.

Specific impact: Project ground disturbing activities such as grading and grubbing may result in habitat destruction, causing the death or injury of adults, eggs, and hatchlings. The Project may remove habitat by eliminating native vegetation that may support essential foraging and breeding habitat.

Why impact would occur: Project implementation includes grading, vegetation clearing, road construction, road maintenance, and other activities that may result in direct mortality, population declines, or local extirpation of California Species of Special Concern.

Evidence impact would be significant: CEQA provides protection not only for state and federally listed species, but for any species including but not limited to California Species of Special Concern which can be shown to meet the criteria for State listing. These Species of Special Concern meet the CEQA definition of rare, threatened or endangered species (CEQA Guidelines, § 15065). Take of Species of Special Concern could require a mandatory finding of significance by the Lead Agency, (CEQA Guidelines, § 15065).

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #1: Due to potentially suitable habitat within the Project site, prior to vegetation removal and/or grading, a qualified biologist familiar with the reptile species behavior and life history shall conduct specialized surveys to determine the presence/absence of Species of Special Concern. Surveys should be conducted during active season when the reptiles are most likely to be detected, between March 1 to October 31 (Thomson, R.C. et al. 2016). Survey results, including negative findings, shall be submitted to CDFW prior to initiation of Project activities.

Mitigation Measure #2: To further avoid direct mortality, CDFW recommends that a qualified biological monitor approved by CDFW be on-site during ground and habitat disturbing activities to move out of harm's way special status species that would be injured or killed by grubbing or Project-related grading activities. It should be noted that the temporary relocation of on-site wildlife does not constitute effective mitigation for the purposes of offsetting Project impacts associated with habitat loss. If the Project requires species to be removed, disturbed, or otherwise handled, we recommend that the Project clearly identify that the designated entity shall obtain all appropriate state and federal permits.

Filing Fees

The Project, as proposed, could have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying Project approval to be operative, vested, and final (Cal. Code Regs, tit. 14, § 753.5; Fish & Game Code, § 711.4; Pub. Resources Code, § 21089).

Conclusion

We appreciate the opportunity to comment on the Project to assist the County in adequately analyzing and minimizing/mitigating impacts to biological resources. CDFW requests an opportunity to review and comment on any response that the County has to our comments and to receive notification of any forthcoming hearing date(s) for the Project. Questions regarding this letter and further coordination on these issues should be directed to Felicia Silva, Environmental Scientist, at Felicia.Silva@wildlife.ca.gov or (562) 430-0098.

Sincerely,

FOR Erinn Wilson
Environmental Program Manager I

ec: CDFW
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CEQA Program Coordinator - Sacramento

Scott Morgan (State Clearinghouse)

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