



Planning Director Staff Report Hearing on June 30, 2022

County of Ventura • Resource Management Agency

800 S. Victoria Avenue, Ventura, CA 93009 • (805) 654-2478 • www.vcrma.org/divisions/planning

CAMP HESS KRAMER COASTAL PLANNED DEVELOPMENT (PD) PERMIT CASE NO. PL19-0005

A. PROJECT INFORMATION

1. **Request:** The applicant requests approval of a Coastal PD Permit for emergency repair activities completed to date under the January 31, 2019, Emergency Coastal PD Permit¹ on the Camp Hess Kramer property (Case No. PL19-0005).
2. **Applicant/Property Owner:** Doug Lynn, Executive Director, Camps and Conference Center, Camp Hess Kramer, Gindling Hilltop Camp, Wilshire Boulevard Temple, 3663 Wilshire Boulevard, Los Angeles, CA 90010
3. **Applicant's Representative:** Ginger Anderson c/o Brownstein Hyatt Farber Schreck, LLP, 1021 Anacapa Street, 2nd Floor, Santa Barbara, CA 93101
4. **Decision-Making Authority:** Pursuant to Sections 8181-3.7 and 8181-3.7(f)(7) of the Ventura County Coastal Zoning Ordinance (CZO), the Planning Director is the decision-maker for the requested Coastal PD Permit.
5. **Project Site Size, Location, and Parcel Number:** Camp Hess Kramer (Middle and Lower Camps) and Gindling Hilltop Camp are confined to an area zoned Coastal Rural Exclusive (CRE), approximately 54.35 acres. The remaining portions of the property are zoned Open Space and are approximately 56 acres. The property is addressed at 11495 and 11677 Pacific Coast Highway in the Santa Monica Mountains, in the unincorporated area of Ventura County. The Tax Assessor's parcel numbers (APN) for the parcels that constitute the project site are 700-0-070-450 and 700-0-060-310. (Exhibit 2).
6. **Project Site Land Use and Zoning Designations (Exhibit 2):**

a. Countywide General Plan Land Use Map Designation:

APN	Coastal Area Plan Designation
700-0-070-450	Open Space
700-0-060-310	Rural and Open Space

b. Coastal Area Plan Land Use Map Designation:

¹ Ventura County Coastal Zoning Ordinance Section 8181-3.7 - Emergency Coastal Development Permits.

APN	Coastal Area Plan Designation
700 -0-070-450	RR 1 DU/2 DU ac (Residential Rural, one dwelling unit per two acres) and OS (Open Space)
700-0-060-310	RR 1 DU/2 ac and OS

c. Zoning Designation:

APN	Zoning Designation
700 -0-070-450	CRE-20 ac/M (Coastal Rural Exclusive, 20 acre minimum parcel size, Santa Monica Mountains Overlay Zone) & COS-10ac-sd/M (Coastal Open Space, 10 acres minimum parcel size, slope density formula, Santa Monica Mountains Overlay Zone).
700-0-060-310	CRE-20 ac/M & COS-10ac-sd/M

7. **Adjacent Zoning and Land Uses/Development (Exhibit 2):**

Location in Relation to the Project Site	Zoning	Land Uses/Development
North	COS-10 ac-sdf/M	Undeveloped, open space and a single-family dwelling
East	COS-10 ac-sdf/M	Undeveloped, open space and Crown Pointe Estates residential community
South	COS-10 ac-sdf	Pacific Coast Highway
West	COS-10 ac-sdf/M	Undeveloped, open space

8. **History:** On November 8, 2018, the Woolsey Fire ignited and burned 96,949 acres of land in Los Angeles and Ventura Counties. Approximately 85 percent of all the structures on the Camp Hess Kramer property were destroyed. Little Sycamore Creek meanders through the camp property before discharging into a culvert beneath State Route (SR) 1 (Pacific Coast Highway) and into the Pacific Ocean. Following the fire, significant rainstorms in November 2018 and January 2019, sent debris and mud originating from the burn areas into Little Sycamore Creek. Storm drains were obstructed or broken and when the creek was full, water with mud and debris backed up onto the camp property.

On January 31, 2019, the Planning Division approved an Emergency Permit for the removal of debris and mud and construction of five check dams at different points within Little Sycamore Creek pursuant to the Ventura County Coastal Zoning Ordinance (CZO) Section 8181-3.7 (Exhibit 3). The emergency work performed was the “minimum amount necessary” to alleviate the immediate threat. On February 15, 2019, construction activities commenced and were completed on April 30, 2019.

On May 1, 2019, the applicant submitted a Coastal PD application to permit the emergency work completed in April 2019 and construct additional bank stabilization and restoration measures at three locations within Little Sycamore Creek.

On June 20, 2019, an Emergency Project Completion Report (“Completion Report”), prepared by Rincon Consultants, was submitted to the Planning Division (Exhibit 4). The Completion Report details the emergency work that was performed and an explanation of how the work complied with the Emergency Permit conditions.

After the removal of mud and debris from Little Sycamore Creek, three locations within the creek were determined to be vulnerable due to the still-weakened state of the creek banks. The project description for the Coastal PD Permit (Case No. PL19-0005), included permitting the emergency work plus the construction of three creek bank stabilization measures (i.e. rock rip-rap followed by revegetation of the creek banks). Installation of two grade control structures, cut-off trenches, and a storm drain outlet were also proposed.

On May 6, 2021, a Planning Director Hearing was conducted. A letter dated May 6, 2021, from Jacqueline Phelps, District Supervisor with the California Coastal Commission South Central Coast District Office was received. Coastal Commission staff noted that because a majority of the existing development on the project site was destroyed, it appeared the proposed creek bank stabilization was not necessary to protect public safety or existing development. The hearing was continued to allow the applicant time to revisit the project description and explain the need for the creek bank stabilization measures.

On January 12, 2022, the project was revised to eliminate the bank stabilization, grade control structures, cut-off trenches, and a storm drain outlet. Therefore, this Coastal PD permit application only includes a request by the applicant to authorize the previous emergency work granted by the 2019 Emergency Permit. Impacts to ESHA that are attributed to the Woolsey Fire are considered a natural disaster and not from the operation of Camp Hess Kramer. Therefore, areas

disturbed to remove debris and mud from the creek will be restored on their own accord.²

- 9. Project Description:** Camp Hess Kramer (applicant), requests approval of a Coastal Planned Development (PD) permit (Case No. PL19-0005) to authorize the work completed within Little Sycamore Creek under an Emergency Coastal PD Permit (“Emergency Permit”). Under the Emergency Permit, debris and mud were removed along an estimated 2,572 linear feet of the creek and five check dams, made of rock and rip rap from the creek, were constructed at different points within the creek to stabilize the bank, and to protect property and ensure public safety. Approximately 14,000 cubic yards of mud and debris was removed from Little Sycamore Creek.

Three temporary water diversions (upstream and downstream sandbag coffer dams) were constructed onsite to ensure emergency work conducted within the creek avoided surface water. The diversions were constructed between April 1 and April 17, 2019, out of sandbags (approximately 3 to 4 feet high) filled with clean sand and wrapped with visqueen plastic to prevent sedimentation into the creek (Exhibit 4). All diversions were removed by April 30, 2019. The locations of the water diversions are as follows:

	Upstream Location	Downstream Location
Water Diversion No. 1	Approximately 0.5 miles upstream of Pacific Coast Highway crossing	Approximately 500 feet downstream of the upstream dam
Water Diversion No. 2	Within the creek approximately 10 feet downstream of the Diversion 1	Within the creek approximately 200 feet downstream from the Diversion 1 upstream dam
Water Diversion No. 3	Within the creek approximately 10 feet downstream of the Diversion 1 downstream dam	Within the creek approximately 500 feet downstream from the Diversion 2 upstream dam

To control groundwater seeping and pooling within the work area, water was pumped out and used for dust control on the roads or contained within earthen berms and sandbags within the project area. Following the completion of the project, the three temporary water diversions (upstream and downstream sandbag coffer dams) were removed.

Three temporary stockpile areas and one temporary storage / staging area are located within unvegetated, previously disturbed areas outside of the creek and

² Additional work that may be required to stabilize the creek will be evaluated as part of the camp rebuild project (Case No. PL21-0051), including restoration of creek banks and adjoining upland areas.

creek bank (Exhibit 5). The locations and size of these areas include the following:

Table 2 - Temporary Stockpile, Staging and Storage Areas		
Stockpile Areas		
Location	Approximate Size (Square Feet)	Distance from top of bank of Little Sycamore Creek
North of Bridge No. 1	750	Between 41 and 83 feet
South of Bridge No. 3 and north of Bridge No. 1	2,300	Between 68 and 109 feet
Middle Camp cabin area	4,800	Between 63 and 121 feet
Staging and Storage Area		
South of Bridge No. 1 in Lower Camp	12,700	Between 44 and 144 feet

Fiber rolls were installed around stockpiles to prevent the transport of soils into the creek and construction fencing was placed around the temporary construction staging areas to prevent the discharge of fuel, lubrication, or other materials being stored, as required by the Emergency Permit conditions of approval (Exhibit 3, Condition BIO-5). Stockpiled soil is routinely maintained to ensure no soil migrates to the creek. Stockpiled soil will be used for additional restoration of the creek under Coastal PD Permit (PL21-0051) that is currently under review.

Impacts to ESHA that are attributed to the Woolsey Fire are considered a natural disaster and not from the operation of Camp Hess Kramer.

All project activities were completed by April 30, 2019.

B. CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) COMPLIANCE

Pursuant to CEQA (Public Resources Code Section 21000 et seq.) and the CEQA Guidelines (Title 14, California Code of Regulations, Division 6, Chapter 3, Section 15000 et seq.), the proposed project is subject to environmental review.

On July 3, 2014, the Planning Commission adopted a Mitigated Negative Declaration (MND) that evaluated the environmental impacts for Conditional Use Permit (CUP) Case No. LU10-0069, which authorized the continued operation of Camp Hess Kramer for a 20-year period. The CUP included campground areas, habitable and non-habitable structures, up to 60 third-party events per year, construction of an advanced On-Site Waste Treatment System (OWTS), and a variance to allow a reduction in the required number of parking spaces. The MND identified potentially significant, but mitigatable,

impacts to biological resources, archaeological resources and noise and vibration. The MND is attached as Exhibit 6.

The CEQA Guidelines [Section 15164(b)] state that the lead agency shall prepare an addendum to an adopted MND if: (1) minor changes or additions are necessary; but (2) none of the conditions described in the CEQA Guidelines (Section 15162) calling for the preparation of a subsequent Environmental Impact Report (EIR) or MND have occurred. An addendum to the adopted MND (Exhibit 6) has been prepared and includes a description of the changes or additions that are necessary to the MND and a discussion of why none of the conditions described in the CEQA Guidelines exist, which require the preparation of an EIR or subsequent MND.

Therefore, based on the information provided above and in light of the whole record, there is no substantial evidence to warrant the preparation of an EIR or subsequent MND, and the addendum to the MND (Exhibit 6) reflects the County's independent judgment and analysis.

C. CONSISTENCY WITH THE GENERAL PLAN

The 2040 Ventura County General Plan *Goals, Policies and Programs* (2020, page 1-1) states:

All area plans, specific plans subdivision, public works projects, and zoning decisions must be consistent with the direction provided in the County's General Plan.

Finally, the Ventura County CZO (Section 8181-3.5.a) states that in order to be approved, a project must be found consistent with all applicable policies of the Ventura County Coastal Area Plan.

An evaluation of the consistency of the proposed project with the applicable policies of the General Plan *Goals, Policies and Programs* and *Coastal Area Plan* and Coastal Area Plan are included in Exhibit 7 of this staff report.

D. ZONING ORDINANCE COMPLIANCE

The proposed project is subject to the requirements of the Ventura County CZO.

Pursuant to Section 8181-3.7 of the Ventura County Coastal Zoning Ordinance (CZO) (Emergency Coastal Development Permits) in the event of an emergency, the Planning Director may issue an emergency permit in accordance with Section 30624 of the Public Resource Code. Development³ authorized in the emergency permit must be removed unless a complete application for a regular coastal development permit for the

³ Coastal Act Section 30106 defines development to include but not be limited to, grading, removing, dredging, or extraction of any materials, and the removal of major vegetation.

development is filed within 90 days of approval of the emergency permit. Pursuant to the requirements of CZO Section 8174-4, development where the primary function is habitat enhancement or restoration, is permitted in ESHA. The emergency work was conducted to restore the functions of Little Sycamore Creek. Upon the granting of the Coastal PD Permit, the proposed project will comply with the requirements of the Ventura County CZO.

The proposed project is subject to grading and brush removal standards for development involving 50 cubic yards or more of grading and more than one half acre of brush removal pursuant to Section 8175-5.17 of the Ventura County CZO. Approximately 14,000 cubic yards of mud and debris was removed from Little Sycamore Creek. The following includes all the applicable grading and brush removal standards, along with Planning Division staff's analysis of the proposed project's consistency with each of the standards.

1. **Ventura County CZO Section 8175-5.17.1:** *Grading plans shall minimize cut and fill operations. If it is determined that a project is feasible with less alteration of the natural terrain than is proposed, that project shall be denied.*

Ventura County CZO Section 8175-5.17.2: *All development shall be designed to minimize impacts and alterations of physical features and processes of the site (i.e., geological, soils, hydrological, water percolation and runoff) to the maximum extent feasible. The clearing of land (grading and brush removal) is prohibited during the winter rainy season (November 15th – April 15th).*

Ventura County CZO Section 8175-5.17.4: *Where appropriate, sediment basins (e.g., debris basins, desilting basins, or silt traps) shall be installed on the project site prior to or concurrent with the initial grading operations and maintained by the applicant through the development process to remove sediment from runoff waters. All sediment shall be retained on-site unless removed to an appropriate approved dumping location.*

Ventura County CZO Section 8175-5.17.5: *Where construction will extend into the rainy season, temporary vegetation, seeding, mulching, or other suitable stabilization methods shall be used to protect soils subject to erosion. The appropriate methods shall be prepared by a licensed landscape architect and approved by the County.*

Ventura County CZO Section 8175-5.17.6: *Cut and fill slopes shall be stabilized at the completion of final grading. To the greatest extent feasible, planting shall be of native grasses and shrubs or appropriate non-native plants, using accepted planting procedures. Such planting shall be adequate to provide 90 percent coverage within 90 days and shall be repeated if necessary to provide such coverage. This requirement shall apply to all disturbed soils.*

As discussed in Section A.8 (above), following the Woolsey Fire in 2018, significant rainstorms sent debris and mud originating from the burn areas into Little Sycamore Creek. Storm drains were obstructed or broken and when the creek was full, water with mud and debris backed up onto the Camp Hess property. Under the Emergency Permit, the applicant removed approximately 14,000 cubic yards (1.45 acres) of mud and debris from Little Sycamore Creek. The emergency work performed was the "minimum amount necessary" to restore the creek functions and allow the conveyance of water, and to alleviate the immediate threat of further destruction to the camp property and the adjacent beach. On February 15, 2019, construction activities commenced and were completed on April 30, 2019. Debris and mud resulting from the onslaught of rain were removed from the creek as a result of the emergency work. To prevent erosion, the applicant removed spoils from the creek and suitable materials free of contaminants, such as trash and debris, to recontour an eroded slope. In addition, all trees along the creek bank were left in place for continued stabilization purposes. Runoff from impervious surfaces would be significantly less due to the removal of most of the development within the camp. That coupled with minimal rain fall in 2021-2022, and some vegetation voluntarily coming back, erosion of the creek banks is not expected to intensify or threaten the camp or beach.

The applicant intends to use this fill dirt for additional creek restoration as part of the camp rebuild project currently in process with the County (Case No. PL21-0051). Best Management Practices (BMPs) (i.e., silt barriers, fiber rolls, sand/gravel bags, straw bale barriers, etc.) were installed to confine the stockpiles and prevent transport of sediment (Exhibit 8, Condition Nos. 17, 23 and 31) and ensure that stormwater offset designs comply with the LARWQCB National Pollutant Discharge Elimination System (NPDES) Municipal Stormwater Permit No. CAS004002 (Permit) requirements. The temporary stockpile, storage and staging areas are frequently inspected and if necessary, additional BMPs are as needed. The emergency work was completed in April 2019 and no additional work is required. Further, no work was permitted during the rainy season. Based on the discussion above, the proposed project is consistent with Ventura County CZO Sections 8175-5.17.1, 8175-5.17.2, 8175-5.17.4, 8175-5.17.5 and 8175-5.17.6.

2. **Ventura County CZO Section 8175-5.17.3:** *For permitted grading operations on hillsides, the smallest practical area of land shall be exposed at any one time during development, and the length of exposure shall be kept to the shortest practicable amount of time. All measures for removing sediments and stabilizing slopes shall be in place prior to or concurrent with any on-site grading activities.*

Ventura County CZO Section 8175-5.17.8: *In addition to any other requirement of this Article, hillside (defined as land with slopes over 20 percent) grading and brush clearance shall be regulated to maintain the biological productivity of*

coastal waters, protect environmentally sensitive areas and park and recreation areas, and minimize the alteration of natural landforms.

Ventura County CZO Section 8175-5.17.9: *A discretionary permit is required for all substantial hillside grading (over 50 cu. Yds. Of cut or fill) or brush clearance (greater than one-half acre), including that related to agricultural activities. The application for the permit shall contain an erosion control plan. Such plan shall be prepared by a licensed engineer qualified in soil mechanics and hydrology, and approved by appropriate County agencies, to ensure compliance with the Coastal Plan and all other County ordinances.*

The emergency work involved removing debris and mud from Little Sycamore Creek. Hillside grading was neither proposed nor required for the emergency work. Silt barriers, fiber rolls, sand/gravel bags, and straw bale barriers were installed to confine the temporary stockpile, storage and staging areas to prevent the transport of sediment and runoff into the creek.

The applicant filed Watercourse Permit No. 2019-010 for Project 608C997 with the Ventura County Watershed Protection District to address temporary impacts to Little Sycamore Creek that resulted from the mud and debris removal under the emergency permit. The Watercourse Permit will be amended to include engineered construction plans and hydraulic modeling that depict existing and proposed drainage trends, proposed improvements, storage volume and peak flood discharge will be required for review and approval of the permit. (Exhibit 8, Condition No. 30).

The MND (Exhibit 6) prepared for Camp Hess Kramer's CUP (Case No. LU10-0069) included Biological Resources Mitigation Measures which required protection of nesting birds and monarch roosting sites. The applicant was also required to retain a County-approved biologist to monitor construction activities. The mitigation measures assigned to Case No. LU10-0069, together with the Emergency Permit conditions, minimized impacts to ESHA (Exhibit 8, Condition Nos. 24 through 26). In addition, there was little, if any, brush clearance required for the emergency work as approximately 85 percent of the camp burned.

Based on the discussion above, the proposed project is consistent with Ventura County CZO Sections 8175-5.17.3, 8175-5.17.8 and 8175-5.17.9.

- 3. Ventura County CZO Section 8175-5.17.7:** *Provisions shall be made to conduct surface water to storm drains or suitable watercourses to prevent erosion. Drainage devices shall be designed to accommodate increased runoff resulting from modified soil and surface conditions as a result of development. Where feasible and appropriate, water runoff shall be retained on-site to facilitate groundwater recharge, unless to do so would require significant grading or brush removal not otherwise necessary, and the cumulative impacts of such on-site*

retention would be greater than the cumulative impacts of not facilitating recharge, within the same drainage area.

No structures, buildings or paved areas are proposed. The removal of mud and debris from the creek was required to restore the functions of Little Sycamore Creek and to minimize potential flood hazards on the camp property and the adjacent beach. Mud/soil removed from the creek will be used for additional creek restoration required under the camp rebuild project (Case No. PL21-0051). Silt barriers, fiber rolls, sand/gravel bags and straw bale barriers were installed to confine the stockpiled mud/soil, and the storage and staging areas in order to prevent transport of sediment.

As discussed in the project description, three temporary water diversions (upstream and downstream sandbag coffer dams approximately 3 to 4 feet high) were constructed onsite to ensure emergency work conducted within the creek avoided surface water. The applicant will be required to amend Watercourse Permit No. 2019-010 for Project 608C997 to address temporary impacts to Little Sycamore Creek from the emergency work (Exhibit 8, Condition No. 30). Based on the discussion above, the proposed project is consistent with Ventura County CZO Section 8175-5.17.7.

4. **Ventura County CZO Section 8175-5.17.10:** *Degradation of the water quality of groundwater basins, nearby streams, or wetlands shall not result from development of the site. Pollutants such as chemical, fuels, lubricants, raw sewage, and other harmful waste shall not be discharged into or alongside coastal streams or wetlands either during or after construction.*

Ventura County CZO Section 8175-5.17.11: *The Ventura County Resource Conservation District and the State Department of Fish and Game shall be consulted for grading of hillsides and brush clearance in excess of one-half acre. In all cases, best accepted management practices shall be used.*

Little Sycamore Creek provides habitat, a wildlife corridor, improves water quality, and balances erosion and sediment deposition for a significant area of the Santa Monica Mountains. The removal of approximately 14,000 cubic yards of mud and debris from the creek has reestablished the creek's ability to convey water and flood hazards on the camp property and the adjacent beach. Spoil materials removed from the creek were stockpiled onsite. Silt barriers, fiber rolls, sand/gravel bags, and straw bale barriers were installed to confine the stockpiles and prevent transport of sediment. Construction fencing and fiber rolls were installed around temporary construction staging and storage areas to prevent the discharge of fuel, lubrication, or other materials being stored during the emergency work (Exhibit 8, Condition Nos. 14 and 17). These construction BMPs ensure that emergency work complied with NPDES stormwater requirements (Exhibit 8, Condition Nos. 23 and 31).

On June 20, 2022, CDFW was notified regarding the Planning Director hearing for the proposed project. As the date of this staff report, no public comments were received from CDFW.⁴ Based on the discussion above, the proposed project is consistent with Ventura County CZO Sections 8175-5.17.10 and 8175-5.17.11.

E. COASTAL PD PERMIT FINDINGS AND SUPPORTING EVIDENCE

The Planning Director must make certain findings in order to determine that the proposed project is consistent with the permit approval standards of the Ventura County CZO (Section 8181-3.5 et seq.). The proposed findings and supporting evidence are as follows:

1. The proposed development is consistent with the intent and provisions of the County's Certified Local Coastal Program [Section 8181-3.5.a].

Based on the information and analysis presented in Sections C and D of this staff report, the finding that the proposed development is consistent with the intent and provisions of the County's Certified Local Coastal Program can be made.

2. The proposed development is compatible with the character of surrounding development [Section 8181-3.5.b].

The project site is in the Santa Monica Mountains Overlay Zone. The purpose of this overlay is to protect unique coastal resources that provide for several unique, rare, or endangered plant and animal species. Little Sycamore Creek meanders through the developed portions of the subject property referred to as Lower and Middle Camp. This creek drains a significant area of the Santa Monica Mountains. The creek provides habitat, a wildlife corridor, improves water quality, and balances erosion and sediment deposition. The creek also provides opportunities for the enjoyment or appreciation of the natural environment.

The removal of approximately 14,000 cubic yards of mud and debris reestablished the creek's ability to carry water downslope and remedy flood hazards on the camp property and the adjacent beach. Therefore, the proposed project will be consistent with the character of the surrounding development.

Based on the discussion above, this finding can be made.

⁴ In November 2021, CDFW, ACOE, and USFWS were consulted to discuss creek restoration proposed under Case No. PL21-0051. Additional work required to stabilize the creek will be evaluated as part of the camp rebuild project (Case No. PL21-0051), including restoration of creek banks and adjoining upland areas.

3. The proposed development, if a conditionally permitted use, is compatible with planned land uses in the general area where the development is to be located [Section 8181-3.5.c].

The proposed project consists of a request for approval of a Coastal PD Permit to authorize the previous emergency work completed to date under the Emergency Permit. The proposed use is not a conditionally permitted use; and, therefore, the requirement of this finding does not apply to the proposed project.

Based on the discussion above, this finding can be made.

4. The proposed development would not be obnoxious or harmful, or impair the utility of neighboring property or uses [Section 8181-3.5.d].

The completed emergency work was not obnoxious or harmful or impaired the utility of neighboring property or uses and instead corrected an imminent threat of further destruction of the camp's property and the beach. Following the Woolsey Fire, significant rainstorms in November 2018 and January 2019, sent debris and mud originating from the burn areas into Little Sycamore Creek. Storm drains were obstructed or broken and when the creek was full of water, mud and debris that backed up onto the camp property and damaged structures, bridges, and roadways that were not destroyed by the fire.

Impacts resulting from the emergency work are temporary. The temporary stockpile, storage and staging areas were installed to confine mud and debris and prevent transport of sediment. BMPs (i.e., silt barriers, fiber rolls, sand/gravel bags, straw bale barriers, etc.) were installed to confine the stockpiles and prevent transport of sediment. The stockpiles, storage and staging areas are frequently inspected and if necessary, additional BMPs are added (Exhibit 8, Condition Nos. 14 and 21). Therefore, the completed emergency work was not obnoxious or harmful, or impaired the utility of neighboring properties or uses.

Based on the discussion above, this finding can be made.

5. The proposed development would not be detrimental to the public interest, health, safety, convenience, or welfare [Section 8181-3.5.e].

The completed emergency work restored creek function and habitat, as well as protect the surrounding habitat from further destruction. The completed emergency work also protects on-site infrastructure not affected by the Woolsey Fire and limits the potential for future channel cuts and significant bank erosion.

The emergency work did not interrupt continued emergency services, nor significantly degrade service levels within the Santa Monica Mountains community. Ventura County Fire Protection District Fire Station No. 56, located at

11855 Pacific Coast Highway in Malibu, is approximately 3,684 feet southeast of the project site. The emergency work restored fire access through the camp.

The surrounding public road network did not significantly generate additional traffic on the County Regional Road Network and local public roads, such that the existing level of service on the local roads was altered by the project because excavated soil was not hauled offsite and instead will be used for additional restoration of the creek under Coastal PD Permit (PL21-0051). Adequate public resources and infrastructure exist to serve the area. The emergency work did not interfere with, or significantly affect, public use of recreational and open space resources within the Santa Monica Mountains National Recreation Area, as all emergency work occurred within the Camp property.

Based on the discussion above, this finding can be made.

6. Private services for each individual development requiring potable water will be able to serve the development adequately over its normal lifespan.

The camp is served by the Yerba Buena Water Company. Temporary water usage was utilized during the emergency work only. Water service was temporarily out of service due to the Woolsey Fire but that it has been restored and while there were structures not affected by the Woolsey Fire, water service is minimal given the camp is currently not in operation. A Water Availability Letter (April 18, 2022) has been received for Coastal PD Permit (Case No. PL21-0051).

To control groundwater seeping and pooling within the work area, water was pumped, captured within the work area and used for dust control on the roads or contained within earthen berms and sandbags within the project area.

Based on the discussion above, this finding can be made.

7. When a water well is necessary to serve the development, the applicant shall be required to do a test well and provide data relative to depth of water, geologic structure, production capacities, degree of drawdown, etc. The data produced from test wells shall be aggregated to identify cumulative impacts on riparian areas or other coastal resources. When sufficient cumulative data is available to make accurate findings, the County must find that there is no evidence that proposed wells will either individually or cumulatively cause significant adverse impacts on the above mentioned coastal resources.

A water well was not used as part of the emergency work. An April 18, 2022, Water Availability letter from the Yerba Buena Water Company confirmed that the camp has been allocated multiple service connections for domestic and irrigation purposes from five wells owned and operated by the water company for

the camp rebuild project. Based on the discussion above, this finding can be made.

- 8. All need for sewage disposal over the life span of the development will be satisfied by existing sewer service to the immediate area or by location of septic facilities on-site consistent with other applicable provisions of the LCP.**

The camp is currently served by private onsite wastewater systems. No development is proposed under Case No. PL19-005. Temporary port-a-potties were brought onsite for construction personnel and have since been removed. Based on the discussion above, this finding can be made.

- 9. Development outside of the established "Community" area shall not directly or indirectly cause the extension of public services (roads, sewers, water etc.) into an open space area.**

An extension of public services was not required for the emergency work. Based on the discussion above, this finding can be made.

F. PLANNING DIRECTOR HEARING NOTICE, PUBLIC COMMENTS, AND JURISDICTIONAL COMMENTS

The Planning Division provided public notice regarding the Planning Director hearing in accordance with the Government Code (Section 65091), CZO (Section 8181-6.2 et seq.). On June 16, 2022, the Planning Division mailed notice to owners of property within 300 feet and residents within 100 feet of the property on which the project site is located. On June 20, 2022, the Planning Division placed a legal ad in the Ventura County Star. As of the date of this document, no public comments were received.

The California Coastal Commission provided two comment letters on the proposed project (Exhibit 10; May 6, 2021, and December 1, 2021). In summary, the Commission requested additional analysis demonstrating the need for the additional bank stabilization measures, grade control structures, cut-off trenches, and a storm drain outlet, impacts to ESHA, and the presence of steelhead trout. Staff's response to the Commission letters are included in Exhibit 10 of this staff report.

G. RECOMMENDED ACTIONS

Based upon the analysis and information provided above, Planning Division Staff recommends that the Planning Director take the following actions:


- 1. CERTIFY** that the Planning Director has reviewed and considered this staff report and all exhibits thereto, including the proposed MND and Addendum to the MND, and has considered all comments received during the public comment process;

2. **FIND** that none of the conditions described in Section 15162 of the CEQA Guidelines calling for the preparation of a subsequent MND have occurred;
3. **ADOPT** the Addendum to the MND (Exhibit 6);
4. **MAKE** the required findings to grant a Coastal PD Permit pursuant to Section 8181-3.5 of the Ventura County CZO, based on the substantial evidence presented in Sections C through E of this staff report and the entire record;
5. **GRANT** Coastal PD Permit (Case No. PL19-0005), subject to the conditions of approval (Exhibit 8).
6. **SPECIFY** that the Clerk of the Planning Division is the custodian, and 800 S. Victoria Avenue, Ventura, CA 93009 is the location, of the documents and materials that constitute the record of proceedings upon which this decision is based.

The decision of the Planning Director is final unless appealed to the Planning Commission within 10 calendar days after the permit has been approved, conditionally approved, or denied (or on the following workday if the 10th day falls on a weekend or holiday). Any aggrieved person may file an appeal of the decision with the Planning Division. The Planning Division shall then set a hearing date before the Planning Commission to review the matter at the earliest convenient date.


If you have any questions concerning the information presented above, please contact Kristina Boero at (805) 654-2467 or kristina.boero@ventura.org.

Prepared by:



Kristina Boero, Senior Planner
Residential Permits Section
Ventura County Planning Division

Reviewed by:



Jennifer Trunk, Manager
Residential Permits Section
Ventura County Planning Division

EXHIBITS

- Exhibit 2 Maps
- Exhibit 3 Emergency Permit and USACE Letter, dated March 28, 2019
- Exhibit 4 Emergency Permit Completion Report, dated June 2019
- Exhibit 5 Project Plans, dated January 26, 2022
- Exhibit 6 Mitigated Negative Declaration (MND) and Addendum
- Exhibit 7 General Plan Consistency Analysis
- Exhibit 8 Draft Conditions of Approval
- Exhibit 9 July 22, 2011, Initial Study Biological Assessment for LU10-0069
- Exhibit 10 May 6, 2021, and December 1, 2021, Coastal Commission Letter and County Response



APNs 700-0-070-450 and 700-0-060-310 include the restoration areas. APN 700-0-060-145 is included to represent the portion of the property that includes the camp CUP.



Ventura County
 Resource Management Agency
 Information Systems GIS Services
 Map created on 1-28-0=2021
 Source: Pictometry; 2018

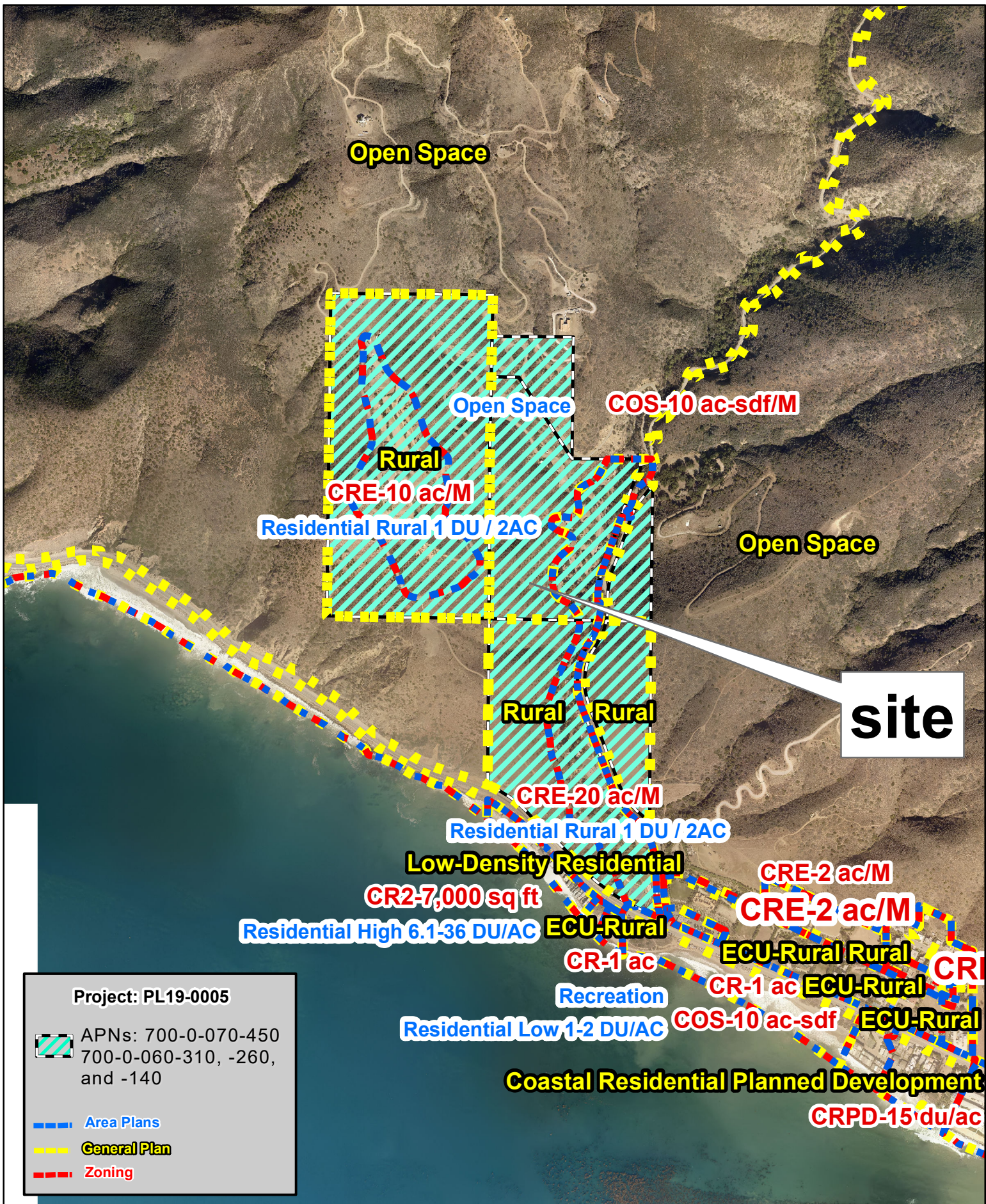


County of Ventura
 Planning Director Hearing
 PL19-0005
Exhibit 2 - Maps





Disclaimer: this map was created by the Ventura County Resource Management Agency Information Systems GIS, which is designed and operated solely for the convenience of the County and related public agencies. The County does not warrant the accuracy of this map and no decision involving a risk of economic loss or physical injury should be made in reliance therein





Project: PL19-0005

APNs: 700-0-070-450
700-0-060-310, -260,
and -140

-  Area Plans
-  General Plan
-  Zoning



Ventura County
Resource Management Agency
Information Systems GIS Services
Map created on 1-28-0=2021
Source: Pictometry: 2018



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January 31, 2019

Mr. Doug Lynn
c/o Wilshire Boulevard Temple Camps – Camp Hess Kramer
11495 and 11677 Pacific Coast Highway
Malibu, CA 90265

Stantec Consulting Services Inc
Attn: Ginger Andersen, Senior Land Use Planner
111 East Victoria Street
Santa Barbara, CA 93101

SUBJECT: Emergency Coastal Development Permit for Debris Removal & Check Dams located at Camp Hess Kramer - Little Sycamore Creek
APNs 700-0-060-310 and 700-0-070-450
Case No. PL19-0005

Dear Mr. Doug Lynn:

The Planning Division has reviewed your request for an Emergency Coastal Development Permit, along with the information that Mr. Hady Izadpanah provided to Ms. Jennifer Welch on January 16, 2019, which was submitted pursuant to the requirements of the Ventura County Coastal Zoning Ordinance (CZO) §8181-3.7. This letter serves as approval of the Emergency Coastal Development Permit to remove debris related to the Woolsey Fire from Little Sycamore Creek and to construct five check dams as described below.

EMERGENCY COASTAL DEVELOPMENT PERMIT

Permittees: Wilshire Boulevard Temple Camps – Camp Hess Kramer, 11495 and 11677 Pacific Coast Highway, Malibu, CA 90265.

Location: Camp Hess Kramer, 11495 and 11677 Pacific Coast Highway, Malibu, CA 90265, and in and along Little Sycamore Creek.

Assessor's Parcel Number (APN): 700-0-060-310 and 700-0-070-450.

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

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

800 South Victoria Avenue, L# 1740, Ventura, CA 93009

Printed on Recycled Paper

County of Ventura
Planning Director Hearing
PL19-0005
Exhibit 3 - Emergency Permit and ACOE Letter, dated
March 29, 2019



b. **Coastal Area Plan Land Use Designation:** Open Space

c. **Zoning Designation:** COS-10ac-sdf/M (Coastal Open Space, 10-acre minimum lot size, slope density formula, Santa Monica Mountains Overlay Zone).

Date of Issuance: January 31, 2019

Nature of the Emergency: On November 8, 2018, the Woolsey Fire ignited and burned 96,949 acres of land in Los Angeles and Ventura Counties. In the unincorporated area of Ventura County's coastal zone south coast region, 19 single-family dwellings were destroyed in the Santa Monica Mountains, nine condominium units and three homes on the seaward side of US Highway 1 (Pacific Coast Highway) were destroyed, and approximately 27 structures were damaged. Camp Hess Kramer, the subject property, was affected by the Woolsey fire, and approximately 85% of all the structures onsite were destroyed.

Little Sycamore Creek runs through Camp Hess Kramer before discharging into a culvert beneath US Highway 1 and into the Pacific Ocean. The headwaters of Little Sycamore Creek (east and west fork tributaries) originate approximately four miles north of the Pacific Ocean. Debris and mud originating from burn areas has migrated into Little Sycamore Creek and has the potential to obstruct the flow of water, causing creek bank erosion and impacts on adjoining property. Rain storms on November 29, 2018, December 6, 2018, and more recently, the week of January 14 and 31, 2019 continue to saturate bare ground and transport mud, sediment and debris into Little Sycamore Creek, which worsens the creek's ability to convey runoff.

Date of Expiration: This Emergency Coastal Development Permit shall expire on May 1, 2019 (i.e., 90 days following the issuance of this Emergency Coastal Development Permit). Pursuant to the CZO §8181-3.7.f(7), the development authorized in the emergency permit must be removed unless a complete application for a regular coastal development permit for the development is filed by May 1, 2019. If a regular Coastal Development Permit authorizing permanent retention of the development, or a portion of the development, is denied, then the development that is authorized in this Emergency Coastal Development Permit, or the denied portion of the development, must be removed.

Project Description (Scope of Work to be Performed):

The project aims to remove mud, downed trees and bridges, and other fire related debris that has made its way into Little Sycamore Creek. The project limits include approximately 4,200 linear feet (LF) along Little Sycamore Creek and adjoining upland areas that are within the Wilshire Boulevard Temple property (Attachment 1, Project Plans).

The emergency actions requested by this permit include the following:

1) Debris and Mud Removal:

Large woody debris and mud will be removed from Little Sycamore Creek. The creek width varies between 10-20 feet. Approximately 252,000 cubic feet (9,333 cubic yards) of mud and woody debris will be removed (estimate assuming 4,200 LF x 15' wide average x 4' average depth).

The contractor will remove debris using excavators, bobcats, dump trucks and skip loaders. The equipment staging, and storage area will be in the middle camp cabin area or other flat previously developed or disturbed areas of the camp. All construction staging, and storage areas shall be located a minimum of 100 feet from Little Sycamore Creek.

The purpose of debris and mud removal is to alleviate the immediate emergency. All repairs and reconstruction shall be kept to an absolute minimum and limited to in-kind replacement or refurbishment of onsite features. The material removed from the creek will be sorted and stockpiled on site in the middle camp cabin area, and later hauled off site to an approved but yet to be determined location.

2) Check Dams:

In order to protect existing bridges from mud and debris while the watershed recovers, nine check dams are contemplated to be installed in Little Sycamore Creek. However, check dams 1, 2, 8 and 9 are not on Wilshire Boulevard Temple property. Therefore, the Emergency Coastal Development Permit authorizes a total of five check dams, numbered 3 through 7 as shown on the project plans (Attachment 1, Project Plans).

The check dams will be constructed from materials found within the creek (i.e. rock). Each check dam is comprised of 1- to 3-ton rocks placed across the creek with larger rocks anchored into the bank approximately two feet deep. The check dams would be approximately two to three feet in height depending on how the rocks are stacked. Smaller rocks would be placed downstream and upstream to act as an apron and interrupt the flow of water and flatten the gradient of the channel. The check dams will be constructed across the creek to counteract erosion by reducing water flow velocity. By constructing a series of check dams situated at regular intervals across the area of interest, water can pond between the check dams and thus slow the flow's velocity down substantially as the water progresses downslope.

In accordance with Coastal Zoning Ordinance Section 8181-3.7(f)(7) Emergency Coastal Development Permits, development authorized in the emergency permit must be removed unless a complete application for a regular coastal development permit for the development is filed within 90 days of approval of the emergency permit is approved. If a regular coastal development permit authorizing permanent retention of the development, or a portion of the development, is denied, then the development that

was authorized in the emergency permit, or the denied portion of the development, must be removed.

Conditions of Approval:

Avoidance and Minimization Measures to Protect Fish, Wildlife and Plant Resources

BIO-1 Construction during a Rain Event

Work during times of precipitation shall be avoided to the maximum extent possible. Water diversion activities must not result in the degradation of beneficial uses or exceedance of water quality objectives of any of the receiving waters. Any temporary dam or other constructed obstruction must only be built from materials which will cause little or no siltation (e.g. clean gravel). Normal flows must be restored to the affected water immediately upon completion of work at that location.

BIO-2 Best Management Practice (BMPs) to Prevent Erosion

Spoils taken from Little Sycamore Creek will be sorted and stockpiled in the flat areas of middle camp. Suitable material free of contaminants (trash, debris, asphalt, etc.) shall be used in areas throughout the camp. Trees along the bank, even if dead or damaged, will be left in place for their roots' stabilizing function.

BIO-3 Night Construction Avoidance

No night time work is permitted.

BIO-4 Temporary Access into Little Sycamore Creek

A total of three temporary access roads would be graded to gain entry into the creek. Areas of temporary disturbance shall be minimized to the extent practicable. If additional access into the creek is required, the Completion Report (see Condition No. 8 below) shall describe the location of these temporary access roads.

BIO-5 Staging Equipment

A Construction Staging and Storage Area(s) shall be in unvegetated, previously disturbed sites, in the middle camp cabin area, and outside of the creek. Fiber rolls will be installed around staging and storage areas. Fueling, lubrication, maintenance, storage and staging of vehicles and equipment must not result in a discharge to any waters of the state and shall be located outside of waters of the state in areas where accidental spills will enter or affect such waters. Dump trucks will be staged outside of the creek banks to accept spoil material coming out of the creek.

BIO-6 Pollutant Management

All vehicles and equipment not in use shall be confined to the designated Construction Staging and Storage Area(s). All vehicles and equipment shall be in good working condition and free of leaks. The contractor shall prevent oil, petroleum products, or any other pollutant from contaminating the soil or entering a watercourse (dry or otherwise). When vehicles or equipment are stationary, mats or drip pans shall be placed below vehicles to contain fluid leaks.

BIO-7 Material Storage

Spoil materials removed from Little Sycamore Creek shall be sorted and stockpiled, on site in the middle camp cabin area, or other areas outside of the creek. Spoil materials shall be protected from stormwater run-off using temporary perimeter sediment barriers (fiber rolls) and/or sand/gravel bags, and straw bale barriers, as appropriate, until dirt can be taken off site. Stockpiled material shall be setback as far away from Little Sycamore Creek as possible. Fiber rolls will be installed along the perimeter of the stockpile to contain spoil material so that it is not allowed to re-enter the creek.

BIO-8 Pollution Prevention

Prevent the discharge of silt or pollutants off the site when working adjacent to potentially jurisdictional waters. Install BMPs (i.e., silt barriers, sand bags, straw bales) as appropriate. Effective best management practices (BMPs) must be implemented to control erosion and runoff from areas associated with the emergency project, this includes access roads.

BIO-9 Site Materials and Refuse Management

All trash shall be disposed of in closed containers and removed from the project area each day during the construction period. Construction personnel shall not feed or otherwise attract wildlife to the construction area. At project completion, all project-generated debris, vehicles, building materials, and rubbish shall be removed from the impact area.

BIO-10 Re-fueling and Maintenance

All re-fueling, cleaning, or maintenance of equipment will occur at least 100-feet from potentially jurisdictional waters.

Planning Division Conditions:

1. All development authorized by this Emergency Coastal Development Permit is temporary until authorized by a follow-up Coastal Development Permit. This

Emergency Coastal Development Permit does not constitute an entitlement to the erection of permanent structures.

2. By May 1, 2019 (i.e., within 90 days of issuance of this Emergency Coastal Development Permit), the Permittee shall submit a follow-up, regular Coastal Development Permit application to the Ventura County Planning Division. If a regular Coastal Development Permit authorizing permanent retention of the development, or a portion of the development, is denied, then the development that is authorized in this Emergency Coastal Development Permit, or the denied portion of the development, must be removed.

3. Documentation Verifying Compliance with Other Agencies' Requirements

Purpose: To ensure compliance with, and notification of, federal, state, and/or local government regulatory agencies that have requirements that pertain to the Project (Condition No. 1, above) that is the subject of this Emergency Coastal Development Permit (Case No. PL19-0005).

Requirement: Upon the request of the Planning Director, the Permittee shall provide the Planning Division with documentation (e.g., copies of permits or agreements from other agencies, which are required pursuant to a condition of this Emergency Coastal Development Permit (Case No. PL19-0005) to verify that the Permittee has obtained or satisfied all applicable federal, state, and local entitlements and conditions that pertain to the Project.

Documentation: The Permittee shall provide this documentation to Planning Division staff in the form that is acceptable to the agency issuing the entitlement or clearance, to be included in the Planning Division Project file.

Timing: The documentation shall be submitted to the Planning Division within 14 days after the regulatory agency has issued the permit and authorized the work.

Monitoring and Reporting: The Planning Division maintains the documentation provided by the Permittee in the respective Project file. In the event that the federal, state, or local government regulatory agency prepares new documentation due to changes in the Project or the other agency's requirements, the Permittee shall submit the new documentation within 30 days of receipt of the documentation from the other agency.

4. Permittee's Consent to Site Inspections

Pursuant to the Ventura County Coastal Zoning Ordinance (§ 8183-5.5), the Planning Division conducts periodic site inspections of permitted facilities and land uses to monitor compliance with the conditions of County-issued permits and the County zoning ordinance. The Permittee hereby consents to the inspection of all property, facilities, operations, that is subject of this Emergency Coastal Development Permit, inspections may occur at any time the Planning Division

deems necessary to fully and effectively monitor the Project, including nights or weekends. Upon the Planning Division's provision of reasonable notice, the Permittee agrees to provide Planning Division staff access to conduct the above-described inspections for the sole and exclusive purpose of monitoring compliance with this permit and the County zoning ordinance.

5. Contact Person

Purpose: To designate a person responsible for responding to complaints.

Requirement: The Permittee shall designate a contact person(s) to respond to complaints from citizens and the County which are related to the permitted activities to alleviate the immediate emergency as described in Condition No.1, Project Description, of this Emergency Coastal Development Permit.

Documentation: The Permittee shall provide the Planning Director with the contact information (e.g., name and/or position title, address, business and cell phone numbers, and email addresses) of the Permittee's field agent who receives all orders, notices, and communications regarding matters of condition and code compliance at the Project site.

Timing: Within 48 hours of project initiation, the Permittee shall provide the Planning Division the contact information of the Permittee's field agent(s) for the Project file. If the address or phone number of the Permittee's field agent(s) should change, or the responsibility is assigned to another person, the Permittee shall provide Planning Division staff with the new information in writing within three calendar days of the change in the Permittee's field agent.

Monitoring and Reporting: The Planning Division maintains the contact information provided by the Permittee in the Project file. The Planning Division has the authority to periodically confirm the contact information consistent with the requirements of § 8183-5 of the Ventura County Coastal Zoning Ordinance.

6. Paleontological Resources Discovered During Grading

Purpose: In order to mitigate potential impacts to paleontological resources that may be encountered during ground disturbance or construction activities.

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

- a. Cease operations and assure the preservation of the area in which the discovery was made;
- b. Notify the Planning Director in writing, within three days of the discovery;

- c. Obtain the services of a paleontological consultant or professional geologist who shall assess the find and provide a report that assesses the resources and sets forth recommendations on the proper disposition of the site;
- d. Obtain the Planning Director's written concurrence with the recommended disposition of the site before resuming development; and
- e. Implement the agreed upon recommendations.

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

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

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

7. Archaeological Resources Discovered During Grading

Purpose: In order to mitigate potential impacts to archaeological resources discovered during ground disturbance.

Requirement: The Permittee shall implement the following procedures:

- a. If any archaeological or historical artifacts are uncovered during ground disturbance or construction activities, the Permittee shall:
 - i. Cease operations and assure the preservation of the area in which the discovery was made;
 - ii. Notify the Planning Director in writing, within three days of the discovery;

- iii. Obtain the services of a County-approved archaeologist who shall assess the find and provide recommendations on the proper disposition of the site in a written report format;
 - iv. Obtain the Planning Director's written concurrence of the recommended disposition of the site before resuming development; and
 - v. Implement the agreed upon recommendations.
- b. If any human burial remains are encountered during ground disturbance or construction activities, the Permittee shall:
- i. Cease operations and assure the preservation of the area in which the discovery was made;
 - ii. Immediately notify the County Coroner and the Planning Director;
 - iii. Obtain the services of a County-approved archaeologist and, if necessary, Native American Monitor(s), who shall assess the find and provide recommendations on the proper disposition of the site in a written report format;
 - iv. Obtain the Planning Director's written concurrence of the recommended disposition of the site before resuming development on-site; and
 - v. Implement the agreed upon recommendations.

Documentation: If archaeological remains are encountered, the Permittee shall submit a report prepared by a County-approved archaeologist including recommendations for the proper disposition of the site. Additional documentation may be required to demonstrate that the Permittee has implemented any recommendations made by the archaeologist's report.

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

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

8. Project Completion Report

Purpose: To document the activities conducted in accordance with this Emergency Coastal Development Permit and to identify permanent retention of the development, or a portion of the development, that would remain after May 1, 2019 (the expiration date of the Emergency Coastal Development Permit).

Requirement: The Permittee shall provide a written Completion Report that describes the work conducted under the Emergency Coastal Development Permit. The report shall include, but not be limited to, a full description of the emergency, objective(s) of the project, scope of work, materials and equipment used, quantities of materials, temporary/permanent impacts, and recommended compensatory mitigation.

Documentation: The Permittee shall provide a written Completion Report to the Planning Division. Additional documentation may be required to demonstrate that the Permittee has implemented any recommendations made by other permitting agencies (i.e. ACOE, RWQCB, CDFW).

Timing: The Permittee shall submit the Completion Report to the Planning Division within 45 days of completing the emergency work authorized by this Emergency Coastal Development Permit.

9. Relationship of Emergency Coastal Development Permit Conditions, Laws, and Other Permits

The Permittee shall implement the Project in compliance with all applicable requirements and enactments of federal, state, and local authorities. In the event of conflict between various requirements, the more restrictive requirements shall apply. In the event the Planning Director determines that any Emergency Coastal Development Permit condition contained herein is in conflict with any other Emergency Coastal Development Permit condition contained herein, when principles of law do not provide to the contrary, the Emergency Coastal Development Permit condition most protective of public health and safety and environmental resources shall prevail to the extent feasible.

No condition of this Emergency Coastal Development Permit for uses allowed by the Ventura County Ordinance Code shall be interpreted as permitting or requiring any violation of law, lawful rules, or regulations, or orders of an authorized governmental agency. Neither the approval of this Emergency Coastal Development Permit, nor compliance with the conditions of this Emergency Coastal Development Permit, shall relieve the Permittee from any responsibility otherwise imposed by law for damage to persons or property.

10. Acceptance of Conditions and Schedule of Enforcement Responses

The Permittee's acceptance of this Emergency Coastal Development Permit and/or commencement of construction and/or operations under this Emergency Coastal

Development Permit shall constitute the Permittee's formal agreement to comply with all conditions of this Emergency Coastal Development Permit. Failure to abide by and comply with any condition of this Emergency Coastal Development Permit shall constitute grounds for enforcement action provided in the Ventura County Coastal Zoning Ordinance (Article 13), which shall include, but is not limited to, the following:

- a. Public reporting of violations to the Planning Commission and/or Board of Supervisors;
- b. Suspension of the permitted emergency repairs;
- c. Modification of the conditions listed herein;
- d. Recordation of a "Notice of Noncompliance" on the deed to the subject property; and/or
- e. The imposition of civil administrative penalties;

The Permittee is responsible for being aware of and complying with the Emergency Coastal Development Permit conditions and all applicable federal, state, and local laws and regulations.

11. Defense and Indemnification

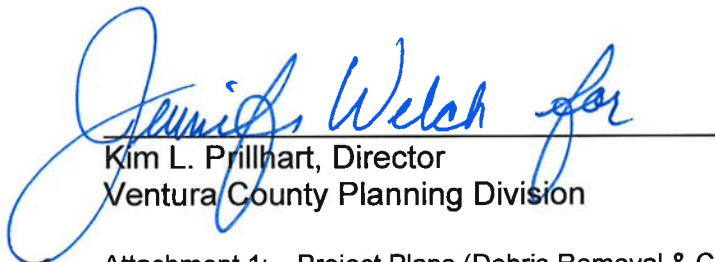
- a. The Permittee shall defend, at the Permittee's sole expense with legal counsel acceptable to the County, against any and all claims, actions, or proceedings against the County, any other public agency with a governing body consisting of the members of the County Board of Supervisors, or any of their respective board members, officials, employees and agents (collectively, "Indemnified Parties") arising out of or in any way related to the County's issuance, administration, or enforcement of this Emergency Coastal Development Permit. The County shall promptly notify the Permittee of any such claim, action or proceeding and shall cooperate fully in the defense.
- b. The Permittee shall also indemnify and hold harmless the Indemnified Parties from and against any and all losses, damages, awards, fines, expenses, penalties, judgments, settlements, or liabilities of whatever nature, including but not limited to court costs and attorney fees (collectively, "Liabilities"), arising out of or in any way related to any claim, action or proceeding subject to subpart (a) above, regardless of how a court apportions any such Liabilities as between the Permittee, the County, and/or third parties.
- c. Except with respect to claims, actions, proceedings, and Liabilities resulting from an Indemnified Party's sole active negligence or intentional misconduct, the Permittee shall also indemnify, defend (at Permittee's sole expense with legal counsel acceptable to County), and hold harmless the Indemnified Parties from and against any and all claims, actions, proceedings, and Liabilities arising out of, or in any way related to, the construction, maintenance, land use, or

operations conducted pursuant to this Emergency Coastal Development Permit, regardless of how a court apportions any such Liabilities as between the Permittee, the County, and/or third parties. The County shall promptly notify the Permittee of any such claim, action, or proceeding and shall cooperate fully in the defense.

- d. Neither the issuance of this Emergency Coastal Development Permit, nor compliance with the conditions hereof, shall relieve the Permittee from any responsibility otherwise imposed by law for damage to persons or property; nor shall the issuance of this Emergency Coastal Development Permit serve to impose any liability upon the Indemnified Parties for injury or damage to persons or property.

If you have any questions about this letter and the terms and conditions of this Emergency Coastal Development Permit, please contact Jennifer Welch at (805) 654-2465 or jennifer.welch@ventura.org.

Sincerely,



Kim L. Prillhart, Director
Ventura County Planning Division

Attachment 1: Project Plans (Debris Removal & Check Dams)

- c: California Coastal Commission – Jacqueline Phelps
Office of Supervisor Parks – Jan Osterhaven
County Executive Office – J. Matthew Carroll



DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS, LOS ANGELES DISTRICT
60 SOUTH CALIFORNIA STREET, SUITE 201
VENTURA, CALIFORNIA 93001-2598

March 28, 2019

SUBJECT: Regional General Permit Verification

Doug Lynn
Wilshire Boulevard Temple Camps - Camp Hess Kramer
3663 Wilshire Boulevard
Los Angeles, California 90010

Dear Mr. Lynn:

I am responding to your request (SPL-2019-00052-GLH) for a Department of the Army permit for your proposed project, Camp Hess Kramer Emergency Check Dams and Debris Removal. The proposed project is located within Little Sycamore Creek, unincorporated Ventura County, California (lat: 34.055743°, long: -118.964513°).

Because this project would result in a discharge of dredged and/or fill material into waters of the United States a Department of the Army permit is required pursuant to Section 404 of the Clean Water Act (33 USC 1344; 33 CFR parts 323 and 330). This activity was previously authorized under Regional General Permit (RGP) No. 63 – *Repair and Protection Activities in Emergency Situations*, in a letter dated January 28, 2019. Due to site and weather conditions, the proposed work extended beyond the expiration date of the previously issued RGP.

Because the proposed impacts to waters of the U.S. are less than what was previously authorized and the current situation continues to present an imminent unforeseen threat to life and/or property, I have determined reauthorization of your proposed project is appropriate and would comply with RGP 63. This verification letter shall supersede our letter of January 28, 2019. Specifically, and as shown in the enclosed figures, you are authorized to:

1. Temporarily impact approximately 1.45 acres of non-wetland waters of the U.S. within Little Sycamore Creek via temporary surface water diversions constructed of SuperSack® and corrugated flex pipe and the removal of approximately 14,000 cubic yards of accumulated sediment and debris.

For this RGP verification letter to be valid, you must comply with all of the terms and conditions stated in the enclosed copy of the RGP. Furthermore, you must comply with the following non-discretionary Special Conditions:

Special Conditions:

1. As directed in RGP 63, any work authorized by this RGP must be the minimum necessary to alleviate the immediate emergency, unless complete reconstruction does not result in significantly increased impacts to aquatic resources and logistical concerns indicate such reconstruction is as expedient considering the condition of the project site and is limited to in-kind replacement or refurbishment. The Permittee shall also avoid impacts to riparian and native vegetation to the extent feasible.
2. The Permittee shall provide a written report of activities completed within 45 days of project completion as noted in General Condition 26 of RGP 63.
3. Pursuant to 36 C.F.R. section 800.13, in the event of any discoveries during construction of either human remains, archeological deposits, or any other type of historic property, the Permittee shall notify the Corps Regulatory Project Manager (Jerry Hidalgo at 805-585-2145) and the Corps' Archeology Staff (Danielle Storey at 213-452-3855 or Meg McDonald at 213 452- 3849) within 24 hours. The Permittee shall immediately suspend all work in any area(s) where potential cultural resources are discovered. The Permittee shall not resume construction in the area surrounding the potential cultural resources until the Corps Regulatory Division re-authorizes project construction, per 36 C.F.R. Section 800.13.
4. The Permittee shall clearly mark the limits of the workspace with flagging or similar means to ensure mechanized equipment does not enter avoided waters of the U.S. Adverse impacts to waters of the U.S. beyond the Corps-approved construction footprint are not authorized. Such impacts could result in permit suspension and revocation, administrative, civil or criminal penalties, and/or substantial, additional, compensatory mitigation requirements.
5. The permittee shall implement clear water diversion best management practices including but not limited to; water quality monitoring before and after construction at a point upstream from the diversion and a point downstream from the diversion.

The work authorized by this RGP must be underway no later than fourteen (14) calendar days from date of issuance of this letter of verification. All work must be completed no later than May 12, 2019. If the Permittee is unable to complete the authorized work by this date, the Permittee must request, in writing, an extension from the Corps Regulatory Division prior to the deadline.

A general permit does not grant any property rights or exclusive privileges. Also, it does not authorize any injury to the property or rights of others or authorize interference with any existing or proposed Federal project. Furthermore, it does not obviate the need to obtain other Federal, State, or local authorizations required by law.

Thank you for participating in the regulatory program. If you have any questions, contact Jerry Hidalgo at (805) 585-2145 or via e-mail at Gerardo.L.Hidalgo@usace.army.mil. Please help me to evaluate and improve the regulatory experience for others by completing the customer survey form at http://corpsmapu.usace.army.mil/cm_apex/f?p=regulatory_survey.

Sincerely,

Antal Szijj
Team Lead
Ventura Field Office
Regulatory Division

Enclosures

**DEPARTMENT OF THE ARMY REGIONAL GENERAL PERMIT
NUMBER 63 FOR
REPAIR AND PROTECTION ACTIVITIES IN EMERGENCY SITUATIONS**

SPONSOR AND ISSUING OFFICE: U.S. Army Corps of Engineers, Los Angeles District

PERMIT NUMBER: Regional General Permit (RGP) No. 63 (File No. SPL-2018-00038-CLH)

ISSUANCE DATE: NOVEMBER 19, 2018

PERMITTEE: Public agencies, businesses, or private parties (i.e., the public in general)

Note: The term "you" and its derivatives, as used in this permit, means the permittee or any future transferee. The term "this office" refers to the appropriate district or division office of the Corps of Engineers having jurisdiction over the permitted activity or the appropriate official acting under the authority of the commanding officer.

You are authorized to perform work in accordance with the terms and conditions specified below.

Project Description: This permit authorizes discharges of dredged or fill material into Waters of the United States, including wetlands, and/or work or structures in Navigable Waters of the United States for necessary repair and protection measures associated with an emergency situation. An "emergency situation" is present where there is a clear, sudden, unexpected, and imminent threat to life or property demanding immediate action to prevent or mitigate loss of, or damage to, life, health, property or essential public services (i.e., a situation that could potentially result in an unacceptable hazard to life or a significant loss of property if corrective action requiring a permit is not undertaken immediately).

Project Location: Within those parts of the State of California subject to regulatory review by this office, including the coastal slopes of San Luis Obispo County, all of Santa Barbara County except for the Carrizo Plain, Ventura, Los Angeles, San Bernardino, Riverside, Orange, San Diego, Imperial and Inyo counties, Mono County to the Conway Summit above Mono Lake, the southern slopes of the Tehachapi Mountains in Kern County, and all of the State of Arizona. In the event of future modifications to District boundaries, this permit would also apply in any areas so revised.

General conditions of this RGP:

1. **Time Period Covered:** This RGP shall expire on November 19, 2023. Authorized activities which have commenced or are under contract to commence prior to this date shall remain authorized provided work within waters of the U.S. is completed within 60 days following expiration of this RGP.

2. **Notification/Communication:**

- a. Timing:** The applicant must notify the District Engineer (DE) as early as possible and shall not begin the activity until notified by the DE that the activity may proceed under this RGP with any site-specific special conditions imposed by the District or Division Engineer. The Corps recognizes there may be situations where imminent threats to life or property occur and the applicant has not received a notice to proceed from the DE. It is not the intention of this office to imply that one allows such threat to life or property result in actual loss. If one proceeds without such notice from the DE, one must ensure that prior notice of such a unilateral decision to proceed is made to this office by telephone, facsimile, e-mail, delivered written notice or other alternative means.
- b. Contents of Notification:** The notification should be in writing and include the following information:
- (1) The name, address, e-mail address and telephone number of the applicant and the designated point of contact and their address, e-mail address and telephone number;
 - (2) The location of the proposed project, including the identification of the waterbody(ies) (this should include a copy of a U.S. Geologic Survey [USGS] topographic map, electronic map images, annotated photographs, Thomas Guide map, or hand-drawn location map with suitable landmarks; the map should have sufficient detail to clearly indicate the location and extent of the project, as well as detailed directions to the site);
 - (3) A brief, but clear, description of the imminent threat to life or property and the proposed project's purpose and need;
 - (4) A description of methods anticipated to be used to rectify the situation ("field engineering" is not an adequate description. It is presumed if one mobilizes material and a particular piece of equipment to a site, then one probably has a fairly well-defined intention for that material and equipment. Photographs, visual renderings of the project, plans, drawings or sketches showing the area to be impacted, cross sections showing details of construction, if appropriate, and a short narrative describing how the work is to be completed should be provided as a minimum); and
 - (5) A brief description of the project area's existing conditions and anticipated environmental impacts resulting from the proposed work (amount of dredge or fill material, acreage of disturbance, removal of significant vegetation, loss of habitat, etc.).
- c. Form of Notification:** The standard Application for Department of the Army Permit (Form ENG 4345), available from the District's website at https://www.spl.usace.army.mil/Portals/17/docs/regulatory/Permit_Process/engform_4345_2017sept.pdf?ver=2017-10-03-165521-953 may be used as the notification and must include all of the information required in General Condition 2.b. Items (1)-(5) above. A letter, facsimile transmission or electronic mail may also be used. In certain situations where there is an imminent threat to life or property and the applicant is unable to make direct contact with this office, a message shall be left on voice mail or an e-mail message shall be sent.

- d. Agency Coordination:** Upon receipt of a notification, the DE will immediately provide (i.e., by facsimile transmission, overnight mail, electronic mail or other expeditious manner) a copy to the offices of the Environmental Protection Agency (EPA), the U.S. Fish and Wildlife Service (FWS), the National Marine Fisheries Service (NMFS), the Monterey Bay National Marine Sanctuary, the California Department of Fish and Wildlife (CDFW), the California State Water Resources Control Board (SWRCB), the Arizona Department of Environmental Quality (ADEQ), the Arizona Game and Fish Department, the Navajo Nation, the Hopi Tribe, the Hualapai Tribe, the White Mountain Apache Tribe; the Big Pine Paiute Tribe of Owens Valley, the Bishop Paiute Tribe, and the Twenty-Nine Palms Band of Mission Indians (collectively, “Tribes”), the California Regional Water Quality Control Boards (RWQCB), the California Coastal Commission (CCC), and the State and Tribal Historic Preservation Offices of California or Arizona (SHPO/THPO), as appropriate. These agencies will be requested to provide a response to the Corps Regulatory Branch Project Manager as expeditiously as possible by telephone, facsimile transmission (fax) or e-mail, indicating whether they intend to provide substantive, site-specific comments regarding the proposed project. If notified that comments will be provided by an agency or tribal representative, the DE will allow them to provide their comments in a short timeframe determined by the DE on a case-by-case basis to not likely result in loss of life or property before making a decision on the proposed project.

The DE will fully consider any comments received within the specified timeframe concerning the proposed activity’s compliance with the conditions of the agency’s authority, the need to impose terms and conditions to avoid and minimize adverse effects on aquatic resources, and the need for mitigation to reduce the project’s adverse environmental effects to a minimal level. The DE will indicate the results of that consideration in the administrative record associated with the notification and will provide an informal response to the commenting agency by electronic mail, facsimile transmission or other means.

- e. Mitigation:** Discharges of dredged or fill material into Waters of the United States must be avoided or minimized to the maximum extent practicable at the project site. Compensation for unavoidable discharge of fill materials may require appropriate mitigation measures. Factors that the DE will consider when determining the suitability of appropriate and practicable mitigation will include, but are not limited to:
- (1) The approximate functions and values of the aquatic resource being impacted, such as habitat value, aquifer recharge, sediment conveyance or retention, flood storage, etc;
 - (2) The permanence of the project's impacts on the resource; and
 - (3) The potential long-term effects of the action on remaining functions and values of the impacted aquatic resource.

To be practicable, the mitigation must be available and capable of being done considering costs, existing technology, and logistics in light of the overall project purposes. Examples of mitigation that may be appropriate and practicable include, but are not limited to: reducing the size of the project; establishing wetland or upland

buffer zones to protect aquatic resource values; replacing the loss of aquatic resource values by creating, restoring, or enhancing similar functions and values; or using bioremediation techniques in conjunction with other methods to offset project impacts. To the extent appropriate, applicants should consider mitigation banking and other forms of mitigation, including contributions to wetland trust funds or in-lieu fees to organizations such as State, county or other governmental or non-governmental natural resource management organizations, where such fees contribute to the restoration, creation, replacement, enhancement, or preservation of aquatic resources.

- f. District Engineer's Decision:** In reviewing the notification for the proposed activity, the DE will determine whether the activity would likely result in more than minimal individual or cumulative adverse environmental effects or may be contrary to the public's interest. The applicant may, as an option, submit a proposed mitigation plan with the notification to expedite the process and the DE will consider any mitigation (See General Condition 2.e. above.) the applicant has included in the proposal in determining whether the net adverse environmental effects for the proposed work are minimal. If the DE determines the activity complies with the terms and conditions of this RGP and the adverse effects are minimal, this office will notify the applicant and include any situation-specific conditions deemed necessary.

If the applicant elects to submit a mitigation plan as part of the proposed project, the DE will expeditiously review the proposed plan also. However, the DE may approve the mitigation proposal after the work is approved and project work has commenced.

If the DE determines the adverse effects of the proposed work are more than minimal, the DE will notify the applicant either:

- (1) That the project does not qualify for authorization under this RGP and instruct the applicant on the procedures to seek authorization under an individual permit or other general permit, or
- (2) That the project is authorized under this RGP subject to the applicant submitting a mitigation proposal that would reduce the adverse effects to the minimal level.

3. **Authorized Work:** Any work authorized by this RGP must be the minimum necessary to alleviate the immediate emergency, unless complete reconstruction only results in very minor additional impact to aquatic resources and logistical concerns indicate such reconstruction is as expedient considering the condition of the project site and is limited to in-kind replacement or refurbishment. Moderate upgrading would be considered if the applicant wishes to use bioremediation or other environmentally sensitive solutions. The RGP may NOT be used to upgrade an existing structure to current standards when that activity would result in additional adverse effects on aquatic resources, except in very limited circumstances. Such upgrade projects shall be considered separate activities for which other forms of authorization will be required.

Work not described in permit application documentation but deemed necessary after a field assessment is not authorized unless coordinated with the Regulatory project manager and acknowledged by appropriate means (i.e., e-mail or facsimile transmission,

memo to the record, etc.). These coordinated permit modifications must also be described in sufficient detail in the post-project report (see RGP 63 General Condition 26).

4. **Start Work Date:** Any projects authorized under this RGP must be initiated within fourteen (14) days of receiving authorization to proceed. If the project start time can be delayed for more than two weeks, the imminent threat of impending loss may have diminished in magnitude, as well as immediacy, and generally would not meet the definition of an “emergency.” However, there may be limited circumstances where, after notice to and input by the agencies, logistical considerations necessitate an extension beyond 14 days. Further, this RGP cannot be used to authorize long-planned-for projects, nor shall it be used for projects that are likely to have been known to the applicant but for which an application was not submitted in a timely manner. That is, the Corps and other agencies are not obligated to authorize work for a self-described emergency situation unless we agree that the situation qualifies as an emergency as defined on page 1.
5. **Access to Site:** You must allow representatives from this office and other agencies to inspect the authorized activity at any time deemed necessary to ensure the project is being or has been accomplished in accordance with the terms and conditions of this RGP.
6. **Tribal Rights:** No activity or its operation may impair reserved tribal rights, including, but not limited to, reserved water rights and treaty fishing and hunting rights.
7. **Water Quality Certification:** Within Los Angeles District, water quality certifications pursuant to Section 401 of the Clean Water Act are administered by the California State Water Resources Control Board (SWRCB) and the Arizona Department of Environmental Quality (ADEQ) for non-tribal land, the U.S. Environmental Protection Agency for tribal lands of Tribes not treated as States, and seven Native American Tribes that are treated as States for Section 401 water quality certification. Section 401 water quality certification from the USEPA is pending as of the date of this permit. Permittees working on tribal land in Los Angeles District must receive individual Section 401 water quality certification from the EPA or one of the seven Tribes identified on page 3 as appropriate. Conditions of the pending water quality certification from the EPA will be incorporated when issued and the permit modified appropriately.

ARIZONA

The ADEQ issued its certification (401 cert reading file SWGP18:0126) on July 26, 2018. No additional conditions were added.

CALIFORNIA

The SWRCB issued its conditional certification (Water Quality Order No. 2018-0029) on November 8, 2018. As with previous reissuances of the RGP, conditions within issued Section 401 certifications are included within the body of the RGP to facilitate dissemination of information to permittees regarding water quality certifications for work authorized under

RGP 63. The SWRCB's water quality conditions are adopted within this permit as RGP 63 General Conditions.

For California Permittees on Non-tribal Land: *The State Water Resources Control Board (SWRCB) issued a conditional Section 401 water quality certification for RGP 63 dated November 08, 2018 for all waters of the United States on non-tribal lands Los Angeles District in the State of California, with the following exception:*

The State's certification does not apply to any discharge from any activity involving a hydroelectric facility requiring a Federal Energy Regulatory Commission (FERC) license or an amendment to a FERC license unless the pertinent Certification application was filed pursuant to title 23 of the California Code of Regulations subsection 3855(b) and the application specifically identified that a FERC license or amendment to a FERC license for a hydroelectric facility was being sought.

The SWRCB's certification for Regional General Permit No. 63 for Emergency Situations, No. 2018-0029, is contingent on all of the conditions listed below being met, and any discharge from an authorized project being in compliance with applicable provisions of Clean Water Act sections 301 (Effluent Limitations), 302 (Water Quality Related Effluent Limitations), 303 (Water Quality Standards and Implementation Plans), 306 (National Standards of Performance), and 307 (Toxic and Pretreatment Effluent Standards).

Discharges covered under this certification are also regulated pursuant to State Water Board Water Quality Order No. 2003-0017-DWQ which authorizes the State's certification to serve as Waste Discharge Requirements pursuant to the Porter-Cologne Water Quality Control Act. (Wat. Code, § 13000 et seq.)

Except as modified by any of the certification conditions below, all certification actions are contingent on (a) the discharge being limited and all proposed mitigation being completed in strict compliance with the conditions of the certification and the attachments to the certification, and (b) compliance with all applicable requirements of Statewide Water Quality Control Plans and Policies and the Regional Water Boards' Water Quality Control Plans and Policies.

Regional Water Quality Control Plan Information

Individual projects authorized under this Order may be located within the jurisdiction of Central Valley, Colorado River Basin, Lahontan, Los Angeles, San Diego and Santa Ana Regional Water Quality Control Boards (collectively Regional Water Boards). Receiving waters and groundwater potentially impacted by individual projects authorized under this Order are protected in accordance with the applicable water quality control plans (Basin Plan) for the regions and other plans and policies which may be accessed online at: http://www.waterboards.ca.gov/plans_policies/. The Basin Plans include water quality standards, which consist of existing and potential beneficial uses of waters of the state, water quality objectives to protect those uses, and the state and federal antidegradation policies.

Dischargers must identify the receiving waters, as listed in the applicable Basin Plan, that would be impacted by a proposed project. This information must be included in the Notice of Intent (NOI; Attachment D).

A. Standard Conditions

- 1. This Certification action is subject to modification or revocation upon administrative or judicial review, including review and amendment pursuant to section 13330 of the California Water Code and section 3867 of title 23 of the California Code of Regulations.*
- 2. This Certification action is not intended and must not be construed to apply to any discharge from any activity involving a hydroelectric facility requiring a Federal Energy Regulatory Commission (FERC) license or an amendment to a FERC license unless the pertinent Certification application was filed pursuant to title 23 of the California Code of Regulations subsection 3855(b) and the application specifically identified that a FERC license or amendment to a FERC license for a hydroelectric facility was being sought.*
- 3. This Certification is conditioned upon full payment of any fee required under California Code of Regulations, chapter 28, title 23, and owed by the Applicant.*
- 4. In the event of any violation or threatened violation of the conditions of this order, the violation or threatened violation shall be subject to any remedies, penalties, process, or sanctions as provided for under state and federal law. For purposes of Clean Water Act, section 401 (d), the applicability of any state law authorizing remedies, penalties, processes, or sanctions for the violation or threatened violation constitutes a limitation necessary to assure compliance with the water quality standards and other pertinent requirements incorporated into this order.*

B. General Conditions

- 1. This Certification is limited to emergency actions that meet the California Environmental Quality Act (CEQA) (Public Resources Code, § 21000 et seq.) definition of an “emergency,” which is defined as follows:*

A sudden, unexpected occurrence, involving a clear and imminent danger, demanding immediate action to prevent or mitigate loss of, or damage to, life, health, property, or essential public services. Emergency includes such occurrences as fire, flood, earthquake, or other soil or geologic movement, as well as such occurrences as riot, accident, or sabotage. (Pub. Resources Code, § 21060.3.)

Emergency actions must meet the above definition of “emergency” and demonstrate an imminent threat to qualify for this Certification. For actions that do not qualify for enrollment under this Certification, the discharger (i.e. the person or entity proposing to conduct actions which may result in a discharge to a water of the state) must contact either the State Water Board or the applicable Regional Water Board to apply for an individual water quality certification.

2. *This Certification is limited to emergency actions that satisfy one or more of the following exemption criteria as defined by the CEQA Guidelines (Cal. Code Regs., tit. 14, § 15269.):*
 - a. *Projects to maintain, repair, restore, demolish, or replace property or facilities damaged or destroyed as a result of a disaster in a disaster stricken area in which a state of emergency has been proclaimed by the Governor pursuant to the California Emergency Services Act, commencing with section 8550 of the Government Code.*
 - b. *Emergency repairs to publicly or privately owned service facilities necessary to maintain service essential to the public health, safety, or welfare.*
 - c. *Specific actions necessary to prevent or mitigate an emergency. This does not include long-term projects undertaken for the purpose of preventing or mitigating a situation that has a low probability of occurrence in the short-term.*
 - d. *Projects undertaken, carried out, or approved by a public agency to maintain, repair, or restore an existing highway damaged by fire, flood, storm, earthquake, land subsidence, gradual earth movement, or landslide, provided that the project is within the existing right of way of that highway and is initiated within one year of the damage occurring. This does not apply to highways designated as official State scenic highways, nor any project undertaken, carried out, or approved by a public agency to expand or widen a highway damaged by fire, flood, storm, earthquake, land subsidence, gradual earth movement, or landslide.*
 - e. *Seismic work on highways and bridges pursuant to section 180.2 of the Streets and Highways Code, section 180 et seq.*
3. *This Certification is limited only to sudden, unexpected emergency situations defined in General Conditions 1 and 2 above that: (1) have occurred, or (2) have a high probability of occurring in the short term as a result of recently discovered factors or events not related to known or expected conditions. Additionally, the sudden, unexpected emergency situation must have the potential to result in an unacceptable hazard to life or a significant loss of property if corrective action is not undertaken within a time period less than the normal time needed to process an application under standard procedures.*
4. *Emergency repairs and reconstruction must begin within fourteen (14) calendar days of receiving authorization unless an extension is granted by the Corps and agreed to, in writing, by the appropriate Regional Water Board.*
5. *Authorized work in waters of the state shall be completed within 180 days of the enrollment date. If it is anticipated that work will not be completed prior to the expiration of enrollment, the Applicant shall request an extension at least thirty (30) days prior to the expiration date. The request shall include justification for the extension.*

6. *All repairs and construction shall be kept to the minimum necessary to alleviate the immediate emergency and limited to in-kind replacement or refurbishment of on-site features. Minor upgrading may be considered if the Enrollee uses bioremediation or other environmentally sensitive solutions. Permanent restoration work other than that performed as an associated part of the emergency operations, including any minor upgrades, shall not be performed without prior approval and authorization by the Water Boards.*
7. Failure to comply with any condition of this Certification shall constitute a violation of the Porter-Cologne Water Quality Control Act and the Clean Water Act. The Enrollee and/or discharger may then be subject to administrative and/or civil liability pursuant to Water Code section 13385.
8. *Permitted actions must not cause a violation of any applicable water quality standards, including impairment of designated beneficial uses for receiving waters as adopted in the Basin Plans by any applicable Regional Water Board or any applicable State Water Board (collectively Water Boards) water quality control plan or policy. The source of any such discharge must be eliminated as soon as practicable.*
9. *In response to a suspected violation of any condition of this Order, the State Water Board may require the holder of this Order to furnish, under penalty of perjury, any technical or monitoring reports the Water Boards deem appropriate, provide that the burden, including costs, of the reports shall bear a reasonable relationship to the need for the reports and the benefits to be obtained from the reports. The additional monitoring requirements ensure that permitted discharges and activities comport with any applicable effluent limitations, water quality standards, and/or other appropriate requirement of state law.*
10. *The Applicant must, at all times, fully comply with engineering plans, specifications, and technical reports submitted to support this Certification; and all subsequent submittals required as part of this Order. The conditions within this Certification and Attachments supersede conflicting provisions within Enrollee submittals.*
11. *This Certification and all of its conditions contained herein continue to have full force and effect regardless of the expiration or revocation of any federal license or permit issued for the Project. For purposes of Clean Water Act, section 401(d), this condition constitutes a limitation necessary to assure compliance with the water quality standards and other pertinent requirements of state law.*

C. Administrative Conditions

1. *Signatory requirements for all document submittals required by this Certification are presented in Attachment B of the Certification.*

2. *This Certification does not authorize any act which results in the taking of a threatened, endangered or candidate species or any act, which is now prohibited, or becomes prohibited in the future, under either the California Endangered Species Act (Fish & G. Code, §§ 2050-2097) or the federal Endangered Species Act (16 U.S.C. §§ 1531-1544). If a “take” will result from any act authorized under this Order held by the Corps, the Corps and/or the Enrollee must obtain authorization for the take prior to any construction or operation of the portion of the Project that may result in a take. The Corps is responsible for meeting all requirements of the applicable endangered species act for the Project authorized under this Order.*
3. *Water Boards staff, or an authorized representative, upon presentation of credentials and other documents as may be required by law, shall be granted permission to enter the dischargers’ site(s) at reasonable times, to ensure compliance with the terms and conditions of this Certification and/or to determine the impacts the discharge may have on waters of the state.*
4. *A copy of this Certification shall be provided to any consultants, contractors, and subcontractors working on the Project. Copies of this Certification shall remain at the Project site for the duration of this Certification. The Applicant shall be responsible for work conducted by its consultants, contractors, and any subcontractors.*
5. *A copy of this Certification shall be available at the Project site(s) during construction for review by site personnel and agencies. All personnel performing work on the Project shall be familiar with the content of this Certification and its posted location at the Project site.*

D. Construction

1. *At all times, appropriate types and sufficient quantities of materials shall be maintained on site to contain and clean up any spill or inadvertent release of materials that may cause a condition of pollution or nuisance if the materials reach waters of the state. Construction personnel must know how to use appropriate containment and clean up materials.*
2. *Fueling, lubrication, maintenance, storage, and staging of vehicles and equipment must not result in a discharge to any waters of the state, and shall be located outside of waters of the state in areas where accidental spills will not enter or affect such waters.*
3. *If construction related materials reach surface waters, appropriate spill response procedures must be initiated as soon as the incident is discovered. In addition, the State Water Board staff contact identified in this Order must be notified via email and telephone within twenty-four (24) hours of occurrence.*

4. *Construction materials and debris from all construction work areas shall be removed from the site and disposed of properly following completion of individual projects enrolled under this Order.*
5. *Water diversion activities must not result in the degradation of beneficial uses or exceedances of water quality objectives of any of the receiving waters. Any temporary dam or other constructed obstruction must only be built from materials which will cause little or no siltation (e.g. clean gravel). Normal flows must be restored to the affected water immediately upon completion of work at that location.*
6. *Effective best management practices (BMPs) must be implemented to control erosion and runoff from areas associated with the emergency project, this includes access roads. All areas of temporary impacts and all other areas of temporary disturbance which could result in a discharge or a threatened discharge to waters of the U.S. and/or state must be restored. Restoration must include grading of disturbed areas to pre-project contours and revegetation with native species.*
7. *All repairs and reconstruction shall be kept to the minimum necessary to alleviate the immediate emergency and limited to in-kind replacement or refurbishment of on-site features. Minor upgrading may be considered if the Enrollee uses bioremediation or other environmentally sensitive solutions. Permanent restoration work other than that performed as an associated part of the emergency operations, including any minor upgrades, shall not be performed without prior approval and authorization by the Water Boards.*

E. Mitigation: *Permitted activities shall be the minimum necessary to alleviate the immediate emergency and a sequence of actions must be taken to avoid and then to minimize adverse impacts to aquatic resources. Compensatory mitigation may be required to offset any remaining unavoidable adverse impacts to aquatic resources.*

F. Emergency Notification and Fee Requirements

1. The State Water Board and the applicable Regional Water Board must receive notification by the discharger at least 48 hours prior to initiating emergency actions. This notification must be followed within three (3) business days by submission of all of the information in the Emergency Notification Form (**Attachment D**).
 - a. Notification may be via telephone, e-mail, written notice, or other verifiable means.
 - A staff directory that includes contact information for State and Regional Program Managers is found at: https://www.waterboards.ca.gov/water_issues/programs/cwa401/docs/staffdirectory.pdf.
 - A map of Regional Board boundaries is found at: https://www.waterboards.ca.gov/waterboards_map.html

Electronic Submittal:

1. *Address e-mail to the “State Program Manager” and the appropriate “Region Program Manager” from the staff directory linked above.*
2. *Include “Attention – RGP 63 Notice of Intent” in the subject line.*

Hardcopy Submittal Addresses:

*ATTN: Program Manager
Wetlands Permitting and Planning
Division of Water Quality
State Water Resources Control Board
1001 “I” St. 15th Floor
Sacramento, CA 95814*

AND

*ATTN: Program Manager
CWA Section 401 WQC Program
Insert mailing address of appropriate Regional Water Board from the staff directory linked above*

2. *The Water Boards recognize there may be situations where imminent threats to life or property occur and the discharger has not received a notice to proceed. If immediate, specific actions, as defined in the California Code of Regulations, title 14, section 15269(c), are required by a discharger and prior notice to the State Water Board and the applicable Regional Water Board is not possible, then the discharger must contact the State Water Board and the applicable Regional Water Board within one (1) business day of the emergency action. This notification must be followed within three (3) business days by submission of all of the information in the Emergency Notification Form (**Attachment D**).*
3. *The Applicant must provide the appropriate fee to the Regional Water Board in accordance with California Code of Regulations, title 23, section 2200 within forty-eight (48) hours of project initiation. Failure to promptly pay the correct fee amount may result in a disqualification for enrollment pursuant to this Certification.*
4. *Once the appropriate Regional Water Board receives a completed Notice of Intent (NOI) and the correct fee from the Enrollee, the Water Board will transmit a Notice of Applicability (NOA) to the Enrollee verifying enrollment in this Certification.*

G. Project Status Notifications

1. *The discharger must provide the State Water Board and the applicable Regional Water Board copies of all correspondence and reports that are submitted to the Corps to satisfy*

the requirements of RGP 63. In addition, the discharger must fill in and submit the form provided in Attachment E.

2. *A completed Notice of Completion (NOC) must be submitted to the appropriate Regional Water Board and State Water Board within 45 calendar days of completion of any action conducted under RGP 63.*
3. *Failure to submit **Attachment E** within 45 calendar days of completion of any emergency actions conducted under this Certification may result in the imposition of administrative and/or civil liability pursuant to Water Code section 13385.*

H. Project Reporting: *If required by the NOA, the Applicant shall submit an Annual Report each year on the anniversary of the date that the individual project is authorized under this Order. Annual reporting shall continue until a Notice of Project Complete Letter is issued to the Applicant.*

I. Conditional Notification and Reporting: *The following notifications and reports are required as appropriate. Reporting requirements are found in Attachment C of the authorization.*

1. Accidental Discharges of Hazardous Materials: *Following an accidental discharge of a reportable quantity of a hazardous material, sewage, or an unknown material, the following applies (Wat. Code, § 13271):*

a. *As soon as (A) Enrollee has knowledge of the discharge or noncompliance, (B) notification is possible, and (C) notification can be provided without substantially impeding cleanup or other emergency measures then:*

- *first call – 911 (to notify local response agency)*
- *then call – Office of Emergency Services (OES) State Warning Center at: (800) 852-7550 or (916) 845-8911*
- *Lastly follow the required OES procedures as set forth in: <http://occupainfo.com/civicaX/filebank/blobdload.aspx?BlobID=26396>
http://www.caloes.ca.gov/FireRescueSite/Documents/CalOES-Spill_Booklet_Feb2014_FINAL_BW_Acc.pdf*

- b. *Following notification to OES, the Enrollee shall notify State Water Board, as soon as practicable (ideally within 24 hours). Notification may be via telephone, e-mail, delivered written notice, or other verifiable means.*
- c. *Within five (5) working days of notification to the State Water Board, the Enrollee must submit an Accidental Discharge of Hazardous Material Report.*

2. Violation of Compliance with Water Quality Standards: *The Enrollee shall notify the State Water Board of any event causing a violation of compliance with water quality standards. Notification may be via telephone, e-mail, delivered written notice, or other verifiable means.*

- a. *Examples of noncompliance events include: lack of storm water treatment following a rain event, discharges causing a visible plume in a water of the state, and water contact with uncured concrete.*
 - b. *This notification must be followed within three (3) working days by submission of a Violation of Compliance with Water Quality Standards Report.*
3. ***Transfer of Property Ownership:*** *This Certification is not transferable in its entirety or in part to any person or organization except after notice to the State Water Board in accordance with the following terms:*
- a. *The Applicant must notify the Water Board of any change in ownership or interest in ownership of the Project area by submitting a Transfer of Property Ownership Report. The Applicant and purchaser must sign and date the notification and provide such notification to the Water Board at least 10 days prior to the transfer of ownership. The purchaser must also submit a written request to the State Water Board to be named as the applicant in a revised order.*
4. ***Transfer of Long-Term BMP Maintenance:*** *If maintenance responsibility for post-construction BMPs is legally transferred, the Enrollee must submit to the appropriate Regional Water Board a copy of such documentation and must provide the transferee with a copy of a long-term BMP maintenance plan that complies with manufacturer or designer specifications. The Enrollee must provide such notification to the Water Board with a Transfer of Long-Term BMP Maintenance Report at least 10 days prior to the transfer of BMP maintenance responsibility.*

J. Water Quality Monitoring

- a. *General: If surface water is present, continuous visual surface water monitoring shall be conducted to detect accidental discharge of construction related pollutants (e.g. oil and grease, turbidity plume, or uncured concrete).*
- b. *Accidental Discharges/Noncompliance: Upon occurrence of an accidental discharge of hazardous materials or a violation of compliance with a water quality standard, State Water Board staff may require water quality monitoring based on the discharge constituents and/or related water quality objectives and beneficial uses.*

END OF SWRCB SECTION 401 WATER QUALITY CERTIFICATION CONDITIONS

8. Coastal Zone Management: For those projects affecting uses or resources of the coastal zone, the Federal Coastal Zone Management Act (CZMA) requires that the Permittee obtain concurrence from the California Coastal Commission that the project is consistent with the State's certified Coastal Management Program. For activities within the coastal zone that require a coastal development permit from the commission, the Permittees should contact the Commission office to request an emergency permit, and no additional federal consistency review is necessary. For activities within the coastal zone that require a coastal

development permit from a local government with a certified local coastal program, the Permittee should contact the appropriate local government. Because a coastal permit issued by a local agency does not satisfy the federal consistency requirements of the CZMA, the Permittee should also contact Larry Simon, Federal Consistency Coordinator for the Commission, at 415-904-5400 to determine the appropriate emergency procedures. For any activity outside the coastal zone, but with the potential to affect coastal uses or resources, or for any activity conducted by a federal agency, the Permittee should contact Larry Simon, Federal Consistency Coordinator for the Commission at 415-904-5400 to determine the appropriate emergency procedures.

Due to the often limited time constraints with emergency actions, the Corps would not require the Permittee to provide proof of review by the Commission, if such an action would result in undue harm to life or property. However, the Corps will require the Permittee to provide evidence of consistency upon completion of the project unless the Corps is already aware that a particular project, class of projects, or projects in a particular area described by the Commission, have received such determinations or waivers. Disposal of flood-delivered sediments into the marine environment is not authorized under RGP 63 due to potential adverse effects to the habitat and water quality. If such activity is proposed, it shall be addressed through other permitting procedures.

9. Endangered Species: No activity is authorized under this RGP which is likely to jeopardize the continued existence of a threatened or endangered species or destroy or adversely modify designated critical habitat as identified under the Federal Endangered Species Act (ESA). Authorization of an activity by the RGP does NOT authorize the "take" of a listed threatened or endangered species, as defined under the Federal ESA. The U.S. Fish and Wildlife Service and/or National Marine Fisheries Service may provide project-specific recommendations to avoid or minimize potential take of listed species or adverse modification of designated critical habitat. The Corps would determine which recommendations would be incorporated into the emergency authorization.

Information on the location of listed or proposed threatened or endangered species and their designated or proposed critical habitat can be obtained directly from the FWS or NMFS or from their websites at:

USFWS – <http://www.fws.gov/endangered>

NMFS – <http://www.nmfs.noaa.gov/pr/species/>

10. Historic Properties: Impacts to historic properties listed, proposed for listing, or potentially eligible for listing in the National Register of Historic Places will be avoided to the maximum extent practicable. If such resources are impacted because of actions authorized under this RGP, the permittee shall provide a full report of the action and the impacts incurred by the resource to this office within 45 days after completion of the action. The Corps, the State and Tribal Historic Preservation Officers, and/or the Advisory Council for Historic Preservation will then jointly make a determination as to appropriate procedures and/or mitigation to be addressed.

If you discover any previously unknown historic or archeological remains while accomplishing the activity authorized by this RGP, you must immediately notify the Corps Regulatory Division who will initiate the Federal and State coordination required to determine if the remains warrant a recovery effort or if the site is eligible for listing in the National Register of Historic Places.

11. Regional and Case-by-Case Conditions: The activity must comply with any regional conditions added by the Division Engineer (see CFR Part 330.4(e)) and with any case-specific conditions added by the District Engineer.

12. Erosion and Siltation Controls: Every effort must be made to ensure any material dredged or excavated from Waters of the United States is not likely to be washed back into any Waters of the United States. When feasible, erosion and siltation controls, such as siltation or turbidity curtains, sedimentation basins, and/or straw bales or other means designed to minimize turbidity in the watercourse above background levels existing at the time of construction, shall be used and maintained in effective operating condition during construction unless conditions preclude their use, or if conditions are such that the proposed work would not increase turbidity levels above the background level existing at the time of the work. All exposed soil and other fills, as well as any work below the ordinary high water mark or high tide line, must be stabilized at the earliest practicable date to preclude additional damage to the project area through erosion or siltation.

13. Equipment: When feasible, and if personnel would not be put into any additional potential hazard, heavy equipment working in wetlands must be placed on mats, or other measures must be taken to minimize soil disturbance, such as use of wide-treaded equipment or floatation devices.

14. Suitable Material: No discharge of dredged or fill material may consist of unsuitable material (e.g., trash, debris, car bodies, asphalt, etc.) and material discharged must be free from toxic pollutants in toxic amounts. (See Section 307 of the Clean Water Act).

15. Wild and Scenic Rivers: No activity may occur in a component of the National Wild and Scenic River System, or in a river officially designated by Congress as a "study river" for possible inclusion in the system while that river is in an official study status, unless the appropriate Federal agency with direct management responsibility for that river has determined in writing that the proposed activity would not adversely affect the Wild and Scenic River designation or study status. Information on Wild and Scenic Rivers may be obtained from the appropriate Federal land management agency in the area (e.g., FWS, National Park Service, USDA Forest Service, Bureau of Land Management). Currently the only designated Wild and Scenic River systems in the Los Angeles District are the main stem of Sespe Creek from its confluence with Rock Creek and Howard Creek downstream to where it leaves Section 26, T5N, R20W; the Sisquoc River from its origin to the Los Padres National Forest boundary in California; and the Verde River from the section line between Sections 26 and 27, T13N, R5E, Gila-Salt River meridian to the confluence of

Red Creek with the Verde River within Section 34, T9 1/2N, R6E.

16. Aquatic Life Movements: No activity may substantially disrupt the movement of those species of aquatic life indigenous to the water body, including those species that normally migrate through the area. Culverts placed in streams must be installed to maintain low flow conditions.

17. Shellfish Production: No discharge of dredged or fill material may occur in areas of concentrated natural or commercial shellfish production, unless the discharge is directly related to a shellfish harvesting activity authorized by the Corps' Nationwide Permit (NWP) 4.

18. Spawning Areas: Discharges in spawning areas during spawning seasons must be avoided to the maximum extent practicable.

19. Waterfowl Breeding Areas: Discharges into breeding areas for migratory waterfowl must be avoided to the maximum extent practicable.

20. Navigation: No activity may cause more than a minimal adverse effect on the course or capacity of a navigable water. The permittee shall agree that, if future operations by the United States require the removal, relocation, or other alteration of the structure or work herein authorized, or if, in the opinion of the Secretary of the Army or his authorized representative, said structure or work shall cause unreasonable obstruction to the free navigation of the navigable waters, the permittee will be required, upon due notice from the Corps of Engineers, to remove, relocate, or alter the structural work or obstructions caused thereby, without expenses to the United States. No claim shall be made against the United States on account of any such removal or alteration.

21. Water Supply Intakes: No discharge of dredged or fill material may occur in the proximity of a public water supply intake except where the discharge is for repair of the public water supply intake structures or adjacent bank stabilization.

22. Obstruction of High Flows: To the maximum extent practicable, discharges must not permanently restrict or impede the passage of normal or expected high flows or cause the relocation of the water except within the existing river plain unless the primary purpose of the fill is to impound waters.

23. Adverse Effects from Impoundments: If the discharge creates an impoundment of water, adverse effects on the aquatic system caused by the accelerated passage of water and/or the restriction of its flow shall be minimized to the maximum extent practicable.

24. Proper Maintenance: Any structure or fill authorized by this RGP shall be maintained, including maintenance to ensure public safety, unless it is later determined that the structure is further contributing to other adverse conditions to private or public property. In such

situations, corrective measures will be taken to rectify these adverse conditions, including removal and/or redesign of the original emergency corrective action, or appropriate mitigation as determined through coordination with you and the appropriate Federal and State agencies. Temporary levees constructed to control flows shall not be maintained beyond the current storm season (i.e., maintenance of temporary levees is not authorized after the storm season in which the need arose).

25. Removal of Temporary Fills: Temporary fills shall be removed in their entirety and the affected areas returned to pre-existing elevations and revegetated with appropriate native riparian or wetland vegetation common to the area. If an area impacted by such a temporary fill is considered likely to naturally re-establish native riparian or wetland vegetation to a level similar to pre-project or pre-event conditions within two years, you will not be required to do so.

26. Reports: You shall provide a concise written report to this office as soon as practicable (within 45 days of completing the project) after completion of any action conducted under this RGP. **PROVIDING THIS REPORT IS MANDATORY.** This office has additional responsibilities pursuant to consultation with the FWS and NMFS under Section 7 of the ESA. Further, these reports enable us to track the use of this RGP to verify that the minimal effects determination is being met as required by Section 404(e) of the CWA. Failure to provide timely reports following responses to emergencies is non-compliance with the General Conditions of this RGP and would be considered a violation (33 CFR Part 326.4(d)).

At a minimum the Report shall include the following:

I. The name, address, e-mail address and telephone number of:

- a. the applicant, and
- b. the applicant's agent (if appropriate)

II. Full description of the activity including:

- a. description of the emergency and the potential for loss of life or property;
- b. purpose of the activity;
- c. final goal of the entire activity;
- d. location (e.g., latitude/longitude or UTM coordinates; section/township/range on appropriate USGS topo map; electronic map images; Thomas Guide map; or other source to accurately portray project location);
- e. size and description of project area (include maps or drawings showing the areal and lineal extent of the project, and pre- and post-construction photographs);
- f. quantities of materials used;
- g. information on receiving waterbody impacted including:
 - (1) name of waterbody
 - (2) type of receiving waterbody (e.g., river/streambed, lake/reservoir, ocean/estuary/bay, riparian area, wetland type, etc.)
 - (3) temporary/permanent adverse impact(s) in acres/cubic yards/linear feet

- (4) compensatory mitigation in acres/cubic yards/linear feet
- (5) other mitigation steps (to avoid, minimize, compensate); and
- h. information on an activity that required permission from the Corps pursuant to 33 U.S.C. 408 because the project altered, temporarily or permanently occupied use of a U.S. Army Corps of Engineers federally authorized civil works project.
- i. information on federally listed or proposed endangered species or designated or proposed critical habitat (notification must be provided to FWS and/or NMFS as appropriate) including:
 - (1) temporary/permanent adverse impacts
 - (2) compensatory mitigation
 - (3) other mitigation steps (to avoid, minimize, compensate).
 - (4) Federal agencies should follow their own procedures for complying with requirements with the Endangered Species Act (ESA) and the National Historic Preservation Act (NHPA). The Federal permittee must provide to the district engineer (DE) the appropriate documentation to demonstrate compliance with these requirements. The DE will verify that the appropriate documentation was submitted. If any documentation is not submitted, and additional ESA and/or NHPA consultation may be necessary for the activity the respective federal agency would be responsible for fulfilling its obligation.”

If there are a substantial number of projects and this requirement would consume large quantities of staff resources, the permittee may, as an option, submit a comprehensive report providing all of the information required in the notification condition (Item 2.b.) above. If a project was conducted in an area known to harbor Federally listed or proposed endangered species or designated or proposed critical habitat, a list of measures taken to minimize harm to the species and/or habitat and provide a copy of the report to the FWS and/or the NMFS, as appropriate, must also be included. If mitigation was determined to be appropriate for a specific project or group of projects, a mitigation proposal must be submitted to this office for review and approval. We will forward the report to the appropriate agencies for their review and comment.

Further Information:

1. Congressional Authorities. You have been authorized to undertake the activity described above pursuant to:
 - Section 10 of the River and Harbor Act of 1899 (33 U.S.C. 403).
 - Section 404 of the Clean Water Act (33 U.S.C. 1344).
 - Section 103 of the Marine Protection, Research and Sanctuaries Act of 1972 (33 U.S.C. 1413).
2. Limits of this authorization.
 - a. This permit does not obviate the need to obtain other Federal, state, or local authorizations required by law.
 - b. This permit does not grant any property rights or exclusive privileges.
 - c. This permit does not authorize any injury to the property or rights of others.
 - d. This permit does not authorize interference with any existing or proposed Federal project.

3. Limits of Federal Liability. In issuing this permit, the Federal Government does not assume any liability for the following:

- a. Damages to the permitted project or uses thereof as a result of other permitted or unpermitted activities or from natural causes.
- b. Damages to the permitted project or uses thereof as a result of current or future activities undertaken by or on behalf of the United States in the public interest.
- c. Damages to persons, property, or to other permitted or unpermitted activities or structures caused by the activity authorized by this permit.
- d. Design or construction deficiencies associated with the permitted work.
- e. Damage claims associated with any future modification, suspension, or revocation of this permit.

4. Reliance on Applicant's Data. The determination of this office that issuance of this permit is not contrary to the public interest was made in reliance on the information you provided.

5. Reevaluation of Permit Decision. This office may reevaluate its decision on this permit at any time the circumstances warrant. Circumstances that could require a reevaluation include, but are not limited to, the following:

- a. You fail to comply with the terms and conditions of this permit.
- b. The information provided by you in support of your permit application proves to have been false, incomplete, or inaccurate (See 4 above).
- c. Significant new information surfaces which this office did not consider in reaching the original public interest decision.

Such a reevaluation may result in a determination that it is appropriate to use the suspension, modification, and revocation procedures contained in 33 CFR 325.7 or enforcement procedures such as those contained in 33 CFR 326.4 and 326.5. The referenced enforcement procedures provide for the issuance of an administrative order requiring you to comply with the terms and conditions of your permit and for the initiation of legal action where appropriate. You will be required to pay for any corrective measure ordered by this office, and if you fail to comply with such directive, this office may in certain situations (such as those specified in 33 CFR 209.170) accomplish the corrective measures by contract or otherwise and bill you for the cost.

6. Extensions. General condition 1 establishes a time limit for the completion of the activity authorized by this permit. Unless there are circumstances requiring either a prompt completion of the authorized activity or a reevaluation of the public interest decision, the Corps will normally give you favorable consideration to a request for an extension of this time limit.

This permit becomes effective when the Federal official, designated to act for the Secretary of the Army has signed below.



Digitally signed by
CASTANON.DAVID.J.1231966150
DN: c=US, o=U.S. Government, ou=DoD, ou=PKI,
ou=USA, cn=CASTANON.DAVID.J.1231966150
Date: 2018.11.19 14:00:04 -08'00'

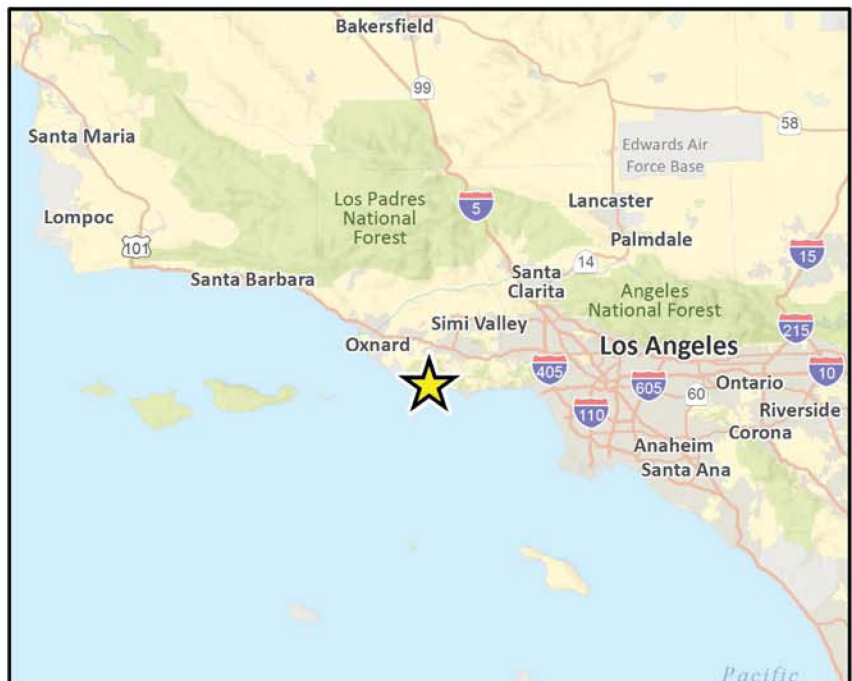
David J. Castanon
Chief, Regulatory Division

DATE



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 Project Location





Pacific Coast Hwy

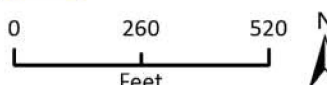
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Yerba Buena Rd

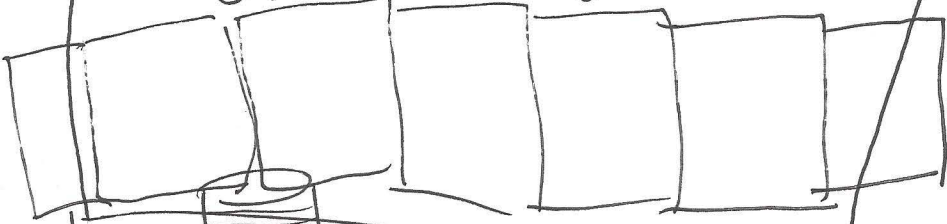
LITTLE SYCAMORE CANYON CRK

Ellice St

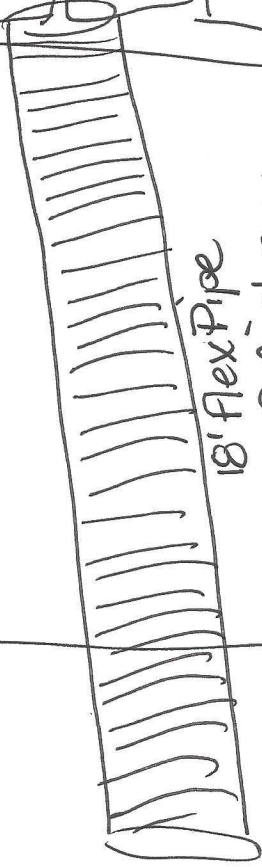
Existing Lot Lines



Super sacks 3 high



18' Flex Pipe
Installed @ first row



Recommended Avoidance and Minimization Measures to Protect Fish, Wildlife and Plant Resources

BIO-1 Avoidance of Rain Event

Work during times of precipitation shall be avoided to the maximum extent possible. No work will occur within the creek while water is flowing through the work area.

BIO-2 Best Management Practice (BMPs) to Prevent Erosion

Spoil shall be spread in the designated area identified in this project. Spoil shall be spread to avoid or minimize risk of erosion. Trees along the bank, even if dead or damaged, will be left in place for their roots' stabilizing function.

BIO-3 Night Construction Avoidance

No night time work is anticipated. Night-time work should be avoided as feasible, to avoid impacts to bats and other wildlife in the area.

BIO-4 Disturbance Area

Areas of temporary disturbance shall be minimized to the extent practicable. Each section of creek (section defined as between two bridges) will have one point of entry for equipment to reduce bank disturbance.

BIO-5 Staging Equipment

Staging and laydown areas shall be unvegetated areas and previously disturbed sites, on site in the middle camp cabin area, and outside of the creek. Fiber rolls will be installed around staging and storage areas. Dump trucks will be staged outside of the creek banks to accept spoil material coming out of the creek.

BIO-6 Pollutant Management

All vehicles and equipment shall be in good working condition and free of leaks. The contractor shall prevent oil, petroleum products, or any other pollutant from contaminating the soil or entering a watercourse (dry or otherwise). When vehicles or equipment are stationary, mats or drip pans shall be placed below vehicles to contain fluid leaks.

BIO-7 Material Storage

Spoil materials removed from Little Sycamore Creek shall be stored , on site in the middle camp cabin area, or other areas outside of the creek. Construction materials and spoils shall be protected from stormwater run-off using temporary perimeter sediment barriers (fiber rolls) and/or sand/gravel bags, and straw bale barriers, as appropriate, until dirt can be taken off site. Fiber rolls will be installed between the stockpile and the creek to contain spoil material so that it is not allowed to re-enter the creek.

BIO-8 Pollution Prevention

Prevent the discharge of silt or pollutants off of the site when working adjacent to potentially jurisdictional waters. Install BMPs (i.e., silt barriers, sand bags, straw bales) as appropriate.

BIO-9 Site Materials and Refuse Management

All food related trash shall be disposed of in closed containers and removed from the project area each day during the construction period. Construction personnel shall not feed or otherwise attract wildlife to the construction area. At project completion, all project-generated debris, vehicles, building materials, and rubbish shall be removed from the impact area.

BIO-10 Re-fueling and Maintenance

All re-fueling, cleaning, or maintenance of equipment will occur at least 100-feet from potentially jurisdictional waters.



Camp Hess Kramer Emergency Project

Project Completion Report

prepared for

Wilshire Boulevard Temple Camps—Camp Hess Kramer and Gindling Hilltop Camp
3663 Wilshire Boulevard
Los Angeles, California 90010

prepared by

Rincon Consultants, Inc.
180 North Ashwood Avenue
Ventura, California 93003

June 2019



RINCON CONSULTANTS, INC.
Environmental Scientists | Planners | Engineers
rinconconsultants.com

County of Ventura
Planning Director Hearing
PL19-0005
Exhibit 4 - Emergency Permit Completion Report,
dared June 2019

Camp Hess Kramer Emergency Project

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1 Introduction

On behalf of Wilshire Boulevard Temple Camps—Camp Hess Kramer and Gindling Hilltop Camp (“Camp”), Rincon Consultants, Inc. (Rincon) has prepared this Project Completion Report for the Camp Hess Kramer Emergency Project (project) in unincorporated Ventura County, California. This report fulfills the following permit requirements:

- Emergency Coastal Development Permit (Case No. PL19-0005), Planning Division Condition 8, issued by Ventura County Planning Division, and
- Regional General Permit (RGP) Number 63 (File No. SPL-2018-00038-CLH) (amended on March 28, 2019), General Condition 26, issued by the U.S. Army Corps of Engineers (USACE).

The Woolsey Fire and subsequent heavy rains between December 2018 and March 2019 caused debris flows to occur in and adjacent to Little Sycamore Creek within the County of Ventura. Little Sycamore Creek flows through Camp Hess Kramer property and carried debris and mud through and onto the property after the rain events that occurred this season.

The project involved removing mud and debris from the site following debris-flow events that occurred with each rain storm. Removal was necessary in order to restore creek capacity and protect existing infrastructure. Project components also included mobilization, water diversion, surface water dewatering, ground water dewatering, water pollution control, and stabilization. The contractor performed removal within and around the channel of Little Sycamore Creek upstream of California State Route 1 (Figure 1) as the Creek flow meandered as sediment was deposited and the original channel filled up. Construction activities commenced on February 15, 2019. Due to the site and weather conditions, USACE amended the RGP 63 Verification Letter on March 28, 2019 to include implementing temporary surface water diversions on the site and extend the permit duration. Baseline water samples were collected on April 1, 2019 prior to the commencement of the water diversions. Three water diversions were implemented on the site to ensure the work conducted within Little Sycamore Creek avoided surface water. Water diversions were installed in a phase approach corresponding to the portions of the channel where work needed to occur. The initial water diversion was implemented on April 1, 2019, a second was implemented on April 9, 2019, and a third was constructed on April 17, 2019. The third water diversion was removed on April 25, 2019. All project activities were completed by April 30, 2019.

Camp is currently pursuing permits for additional work necessary to stabilize the creek bank in certain areas.

Wilshire Boulevard Temple Camps—Camp Hess Kramer and Gindling Hilltop Camp
Camp Hess Kramer Emergency Project

Figure 1 Regional Location



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★ Project Location

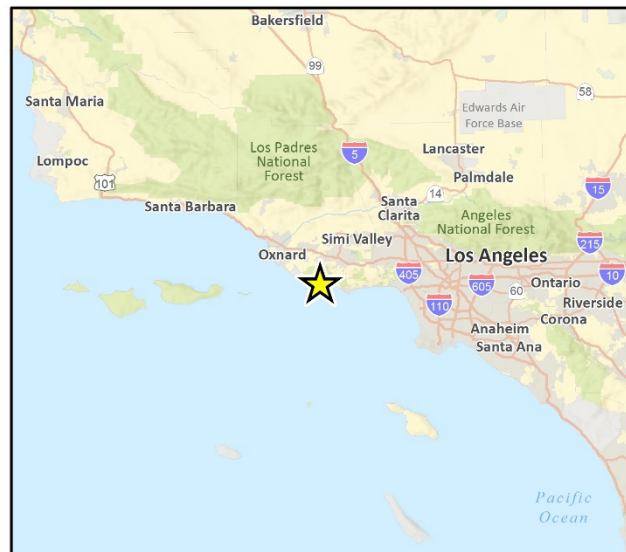


Fig 1 Regional Location

2 Project Description

2.1 Project Need

The Camp owns and operates an outdoor recreation camp at 11495 Pacific Coast Hwy in unincorporated Ventura County (Figure 1). Little Sycamore Creek (creek) runs through the Middle and Lower Camp areas. A private road runs through the Camp (north to south), and crosses the creek multiple times via bridge crossings. The heavy rains following the Woolsey Fire caused mud and debris flows to occur on camp property and damage infrastructure, including the private road, parking lot, and buildings, throughout the camp (Appendix A, Project Photographs).

The Woolsey Fire began on November 8, 2018 and burned 96.949 acres of land in Los Angeles and Ventura Counties before it was contained. The fire burned the property on and around the camp, including approximately 85% of all structures that were on the site. During the 2018-2019 rain year following the fire, high intensity rain storms fell and caused mudslides and debris flows adjacent to Little Sycamore Creek (high intensity storms occurred on November 29, 2018, December 6, 2018, January 7, 2019, January 7 through 17, 2019, January 31 through February 4, 2019, February 12 through 14, February 26 through 27, and March 3-6, 2019). The flooding of this creek caused significant damage to camp property and the environment. Much of the bed, bank, and channel within the creek was altered substantially as a result of the debris flow. Fire-debris inundated the creek and raised the bed significantly from pre-fire levels. The raised creek bed caused the adjacent property, including the private road, parking lot, and remaining buildings, to be flooded with mudflow. The erosion caused to the creek was undermining existing paved parking areas and roads on Camp Hess property. Fire-debris removal was necessary to control the erosion and undermining of existing infrastructure by stabilizing the banks of Little Sycamore Creek.

2.2 Location and Activity

The project area begins approximately 0.2 miles upstream of the California State Route 1 and Little Sycamore Creek crossing and extends approximately 0.3 nonlinear miles upstream. The approximate center of the project area occurs at latitude 34.058807°N and longitude 118.965616°W (WGS-84 datum). The project area is in the Triunfo Pass, California United States Geological Survey 7.5-minute topographic quadrangles in Township 1 South, Range 20 West, Section 22 (San Bernardino baseline and meridian) (Figure 2). For the purposes of this report, the location where construction activities occurred will be referred to as the project area (Figure 3 and Figure 4).

The rain events that occurred after the fire caused a significant amount of sediment to flow onto the camp from upstream via Little Sycamore Creek and the tributaries, and from erosion of the slopes surrounding the creek on the property itself. The creek bank eroded significantly in various locations and threatened the integrity of existing roads, infrastructure, and bridges. To reinforce the protection of the property, the Camp Hess Emergency Project (project) included the removal of sediment from the creek bed and adjacent property to stabilize the banks.

Wilshire Boulevard Temple Camps—Camp Hess Kramer and Gindling Hilltop Camp
Camp Hess Kramer Emergency Project

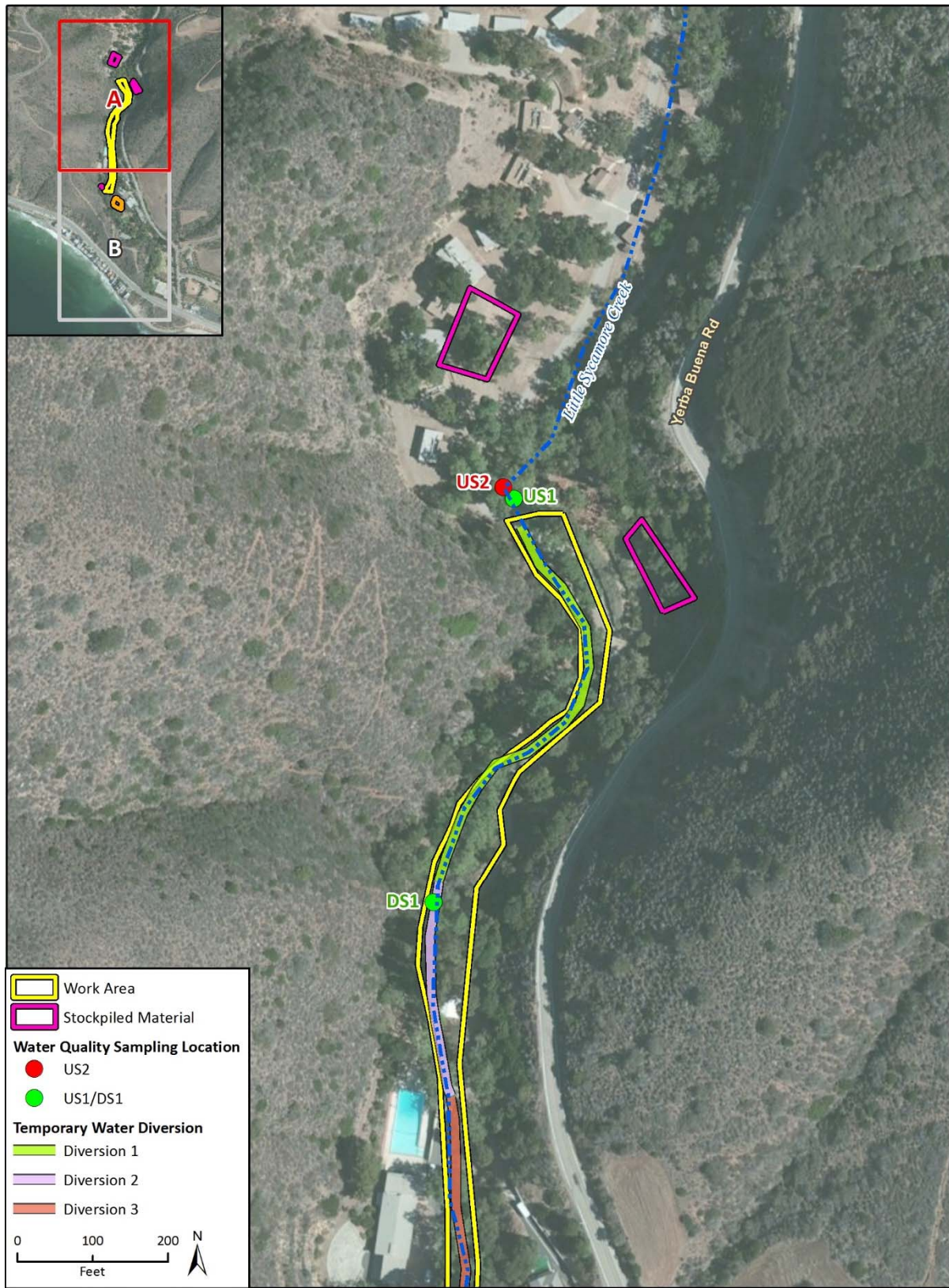
Figure 2 Regional Location



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Triunfo Pass Quadrangle. T01S R20W S22,27.

Fig. 2 Project Location. 8/20/20

Figure 3 Project Location



Wilshire Boulevard Temple Camps—Camp Hess Kramer and Gindling Hilltop Camp
Camp Hess Kramer Emergency Project

Figure 4 Project Location



Little Sycamore Creek contained flowing water for the duration of the project. The vegetation immediately surrounding the site consisted of burned trees and burned native and non-native plants which were observed to grow back during project activity. Aquatic vegetation (algae) and fine sediment and fire debris deposits were present within the channel.

On February 15, 19, and 26, 2019 and March 18 and 19, 2019, the contractor used an excavator to remove debris and mud from the area directly adjacent to and within Little Sycamore Creek. Equipment used to remove debris did not drive into the creek and was operated from the banks. Material that was removed from the creek was stockpiled along the canyon wall, approximately 100 feet from the creek. Equipment was used to redirect the creek to flow adjacent to the infrastructure that was threatened on the site. This work was completed under the initial USACE RGP Number 63, prior to the amendment that permitted water diversion activity within the creek.

On March 14, 2019, Jerry Hidalgo (USACE) and personnel from Rincon, the contractors, Stantec Consulting Services (Stantec) and Camp Hess met at the project area to discuss the justification for modifying the RGP 63 Verification Letter to include increased sediment amount, dewatering the creek in strategic locations, and prolonging the schedule. An amended Verification Letter was received on March 28, 2019. Following the amendment, no equipment entered or came in contact with the flowing water in the creek.

Water-tight diversions were utilized to control the surface water after the amended permit was authorized. Three total diversions were used because the heightened levels of groundwater in the creek threatened to overpower a diversion that was longer than 500 feet.

On April 1, 2019, the initial diversion (Diversion 1) was constructed. The upstream coffer dam was located approximately 0.5 miles upstream of the California State Route 1 crossing and the downstream cofferdam was located approximately 500 feet downstream of the upstream dam. The contractors constructed the upstream coffer dam with super sack bags three-high (approximately 4 feet high), filled with clean sand, and wrapped with visqueen plastic to prevent sedimentation into the creek. The downstream cofferdam was constructed out of sand bags, filled with clean sand, three sand bags high. All heavy equipment was lowered into the creek via a large excavator staged outside of the creek or brought into the creek by hand. The excavator did not come into contact with the creek. Diversion 1 was completed and observed to be water tight on April 3, 2019. Contractors removed sediment from the creek within the diversion area while it was in place. Diversion 1 was deconstructed on April 8, 2019.

On April 8, 2019, the second diversion (Diversion 2) was constructed within the creek. The upstream cofferdam was located approximately 10 feet downstream of Diversion 1 downstream cofferdam. Diversion 2 downstream cofferdam was located approximately 200 feet downstream from the upstream dam. The contractors constructed the upstream cofferdam with super sack bags two-high (approximately 3 feet high), filled with clean sand, and wrapped with visqueen plastic to prevent sedimentation into the creek. The downstream coffer dam was constructed out of sand bags, filled with clean sand, three sand bags high. All equipment was lowered into the creek via a large excavator staged outside of the creek or brought into the creek by hand. The excavator did not come into contact with the creek. Diversion 2 was completed and observed to be water tight on April 9, 2019. Contractors removed sediment from the creek within the diversion area while it was in place. Diversion 2 was deconstructed on April 17, 2019.

On April 17, 2019, the third diversion (Diversion 3) was constructed within the creek. The upstream cofferdam was located approximately 10 feet downstream of Diversion 2 downstream cofferdam. Diversion 2 downstream cofferdam was located approximately 500 feet from the upstream dam.

The contractors constructed the upstream cofferdam with super sack bags two-high (approximately 3 feet high), filled with clean sand, and wrapped with visqueen plastic to prevent sedimentation into the creek. The downstream cofferdam was constructed out of sand bags, filled with clean sand, three sand bags high. All equipment was lowered into the creek via a large excavator staged outside of the creek or brought into the creek by hand. The excavator did not come into contact with the creek. Diversion 3 was completed and observed to be water tight on April 17, 2019. Contractors removed sediment from the creek within the diversion area while it was in place. Diversion 3 was deconstructed on April 24, 2019. All construction equipment within the channel was deconstructed and removed including the temporary coffer dam and flex pipe. After the third diversion was deconstructed, no additional in-creek work was conducted.

Following completion of the watertight water diversion systems, it became apparent that some ground water was seeping into the work area from beneath the ground surface. Per the amended RGP 63 Verification Letter, no work was permitted to occur within the creek while water was flowing through the work area. To control the ground water within the work area, as needed, the contractor utilized a water pump within the creek. Groundwater that percolated up and pooled within the project area was pumped out of the project area and used for dust control on the roads. The groundwater within the project area was contained with earthen berms and sandbags and did not flow downstream.

Work was also completed outside of the creek (i.e., removing sediment on the banks of the creek or between the water-tight diversion, moving sediment to the stockpiles, no in-creek work) on the following dates in 2019: February 20 through 22, 27, and 28; March 1, 4, 6 through 8, 11 through 13, 15, 20, 22, and 25 through 28; and April 4, 5, 10 through 12, 18, 19, 22, 23, 26, 29, and 30.

The project was completed, and all equipment was moved out of the project area on April 30, 2019.

No permanent check dams were constructed within Little Sycamore Creek or the two unnamed tributaries to Little Sycamore Creek. No mitigation, including compensatory mitigation, was implemented on the site.

Table 1 summarizes the excavation data collected on August 30, 2019 after all grading and excavation was complete.

Table 1 Total Project Fill/Excavation Quantity

Aquatic Resource Type	Temporary Impact				Permanent Impact				Compliance (Yes/No)
	Acres	Cubic Yards Removed	Allowable Acreage*	Allowable Cubic Yards Removed*	Acres	Cubic Yards Removed	Allowable Acreage*	Allowable Cubic Yards Removed*	
Little Sycamore Creek	1.45	14,000	1.45	14,000	0	0	0	0	Yes

*Regional General Permit (RGP) 63 Verification Letter (File No. SPL-2018-00038-CLH) (amended on March 28, 2019), Condition 1, issued by the U.S. Army Corps of Engineers (USACE).

2.3 Biological Monitoring

Rincon monitors were on site three (3) times in February (February 15, 19, and 26); five (5) times in March (March 5, 14, 18, 19, and 29); and ten (10) times in April (April 1, 2, 3, 8, 9, 15, 16, 17, 24, and 25). In February and March, Rincon was onsite to monitor all work within the creek and conduct Best Management Practice (BMP) inspections. Beginning April 1, 2019 through project completion, Rincon was onsite to monitor the installation/deconstruction of the water diversion systems, to conduct water quality sampling (pre and post diversion installations), and to conduct BMP inspections.

While biological monitors were at the project area, no heightened turbidity was observed. In April, after the RGP 63 Verification Letter amendment was issued, no equipment was observed to come in contact with Little Sycamore Creek. When not in use, equipment was observed to be staged in the staging areas with visqueen and straw wattles under the equipment to catch any leaks that may occur. The project site was clean with applicable BMPs in place during all visits.

Although specific nesting bird avoidance measures were not identified within the acquired permits, the following regulations apply to this project:

- Under the provisions of the Migratory Bird Treaty Act (MBTA), it is unlawful “by any means or manner to pursue, hunt, take, capture (or) kill” any migratory birds except as permitted by regulations issued by the United States Fish and Wildlife Service (USFWS). The term “take” is defined by the USFWS regulation to mean to “pursue, hunt, shoot, wound, kill, trap, capture or collect” any migratory bird or any part, nest, or egg of any migratory bird covered by the conventions, or to attempt those activities.
- Sections 3503, 3503.5, and 3511 of the California Fish and Game Code (CFG) describe unlawful take, possession, or destruction of birds, nests, and eggs. Fully protected birds (Section 3511) may not be taken or possessed except under specific permit. Section 3503.5 of the CFG protects all birds-of-prey and their eggs and nests against take, possession, or destruction of nests or eggs.

While monitoring, Rincon biologists were observing the project area and locations surrounding it for nesting bird behavior per the previous regulations. The area observed included the entire project area and the access roads that led to and from this location. Nest-finding methods described in the *Handbook of Field Methods for Monitoring Landbirds*¹ were utilized to monitor for nesting bird activities and nest monitoring. These methods rely on auditory and visual behavioral cues to locate nests.

Chicks were observed in an active corvid (*Corvus* sp.) nest adjacent to the staging area parking lot in one of the large sycamore trees (*Platanus racemosa*) next to the creek on April 2, 2019. Based on observations of behavior and the high tolerance of the species, the birds appeared to be unaffected by construction activities. A twenty-foot avoidance buffer was placed around the active nest. Avoidance included avoiding driving, staging equipment, walking within this area, etc. without a biological monitor present. The chicks successfully fledged and were no longer dependent on the nest as of April 24, 2019.

¹ Ralph, C. J., G. R. Geupel, P. Pyle, T. E. Martin, and D. F. Desante. 1993. *Handbook of Field Methods for Monitoring Landbirds*. Gen. Tech. Rep. Psw-Gtr-144. Albany, Ca: Pacific Southwest Research Station, Forest Service, USDA.

A house finch (*Haemorhous mexicanus*) was observed bringing nest material to a building approximately twenty feet from the access road on April 9, 2019. However, biologists were able to prevent the nesting attempts by removing the material as soon as it was placed by the bird. The removal occurred to ensure the bird did not nest in an active construction zone.

A house wren (*Troglodytes aedon*) was observed bringing nest material to a sycamore tree directly above the active project area on April 17, 2019. However, biologists were able to prevent the nesting attempts by removing the material as soon as it was placed by the bird. The removal occurred to ensure the bird did not nest in an active construction zone.

Eggs were observed in an active house finch nest within one of the staged tractors in the staging area on April 24, 2019. Based on observations of behavior, the birds appeared to be unaffected by construction activities. A forty-foot avoidance buffer was placed around the active nest. Avoidance included avoiding driving, staging equipment, walking within this area, etc. without a biological monitor present. The nest was surveyed while monitors were on the site. Due to the angle of the nest within the tractor, monitors were not able to observe the adults sitting on the nest. However, adults were observed flying to and from the location until the project was complete on April 30, 2019.

A potentially active cliff swallow (*Petrochelidon pyrrhonota*) nest was observed on April 24, 2019 immediately adjacent to Yerba Buena road and located approximately 300 feet southeast of the staging area. The nest was located above the Camp Hess main office. It was located approximately fifteen feet from the access gate to enter the property. Every day of the project, multiple vehicles used this access gate to enter and exit the project site and access the staging area. Two cliff swallow adults were observed to be carrying nesting material to the nest. The birds appeared to be unaffected by construction activities (i.e., vehicles driving approximately 15 feet from the nest) and continued to bring nesting materials to the nest while the monitor was observing the area. No buffer was placed around the potentially active nest due to the high tolerance of the species and continuous activity adjacent to the nest. No activity that could cause heavy vibrations that may cause the nest to fail (e.g., drilling into the wall that the nest was located) was conducted within 50 feet of the nest. Adults were observed flying to and from the location until the project was complete on April 30, 2019.

No other signs of active breeding/nesting behavior were observed during the monitoring.

2.4 Best Management Practices

Best Management Practices in place for the duration of construction included the maintenance of the water diversion systems to ensure they were water tight, temporary sandbag coffer dams, water pumps and hoses, visqueen covering and fiber rolls around stockpiled dirt, containment for stationary equipment, silt fencing, removal of trash from the work area, secondary containment used for all generators and portable restrooms located on the site, and proper disposal of construction debris (Appendix A, Project Photographs).

3 Surface Water Sampling Summary

Baseline water quality samples were collected on April 1, 2019, prior to the installation of the water diversion. Per Special Condition 5 of the RGP 63 Verification Letter, water quality sampling is required before and after construction at a point upstream from the diversion and a point downstream of the diversion. Construction of Diversion 1 began April 1, 2019, and the diversion was fully installed on April 3, 2019. Construction Diversion 2 began April 8, 2019 and the diversion was fully installed on April 9, 2019. Construction of Diversion 3 began and was fully installed on April 17, 2019. The third diversion was deconstructed on April 24, 2019. Water quality sampling was collected prior to all diversion activities and following the deconstruction of the third diversion. Pre and post-diversion sampling was not conducted for each individual diversion due to the fact that diversion removal and construction overlapped within the creek (i.e., Diversion 1 was not deconstructed prior to the installation of Diversion 2, Diversion 2 was not deconstructed prior to the installation of Diversion 3).

Measurable flow occurred at upstream and downstream sampling points during all visits.

Water samples were collected to monitor pH, temperature, dissolved oxygen, and turbidity. Construction activities and all water quality variables were measured in the field.

Handmeters used to conduct water sampling were as follows:

- **Dissolved oxygen:** YSI Incorporated, Model # Pro20
- **Temperature and pH:** Hanna, Model # HI 98129
- **Turbidity:** LaMotte, Model # 2020e

All meters were calibrated on April 1 and 25, 2019.

3.1 Water Quality Data Results

Baseline water samples were initially collected on April 1, 2019, from upstream and downstream of Diversion 1 (US1 and DS1, Figures 3 and 4). The US1 and DS1 sampling points were selected because they represented the limits of the work area per conversations with the contractor. Water quality sampling was collected at US2 and DS2 post-diversion deconstruction (April 25, 2019). US2 and DS2 locations were selected because they were located outside of all diversion activities that occurred in the project area.

Table 2 through Table 5 summarize the water quality data collected for the constituents of concern during all sampling events. Change was calculated by subtracting the upstream value from the downstream value.

Table 2 Little Sycamore Creek Dissolved Oxygen (mg/L)

Date	US1	DS1	US2	DS2	Minimum Requirement (mg/L)	DO Standard for All Waters (mg/L)	Compliance (Yes/No)
4/01/19	10.7	10.8			5	7	Yes
4/25/19			9.5	10.0	5	7	Yes

Per the Basin Plan Water Quality Objectives, at a minimum, the mean annual dissolved oxygen concentration of all waters shall be greater than 7 mg/L, and no single determination shall be less than 5 mg/L, except when natural conditions cause lesser concentrations. The dissolved oxygen content shall not be depressed below 5 mg/L as a result of waste discharges.

Table 3 Little Sycamore Creek pH

Date	US1	DS1	US2	DS2	Change	Allowable Change (+/-)	Allowable Range	Compliance (Yes/No)
4/01/19	8.64	8.34			-0.03	0.5	6.5-8.5	Yes
4/25/19			8.10	8.00	-0.10	0.5	6.5-8.5	Yes

Per the Basin Plan Water Quality Objectives, the pH of inland surface waters shall not be depressed below 6.5 or raised above 8.5 as a result of waste discharges. Ambient pH levels shall not change more than 0.5 units from natural conditions as a result of waste discharges.

Table 4 Little Sycamore Creek Temperature (Degrees Fahrenheit [°F])

Date	US1	DS1	US2	DS2	Change (°F)	Allowable Increase (°F) (+/-)	Compliance (Yes/No)
4/01/19	56.8	56.5			-0.3	5	Yes
4/25/19			60.1	59.4	-0.7	5	Yes

Per the Basin Plan Water Quality Objectives water temperature shall not be altered by more than 5 °F above the natural temperature. At no time shall these WARM designated waters be raised above 80 °F as a result of waste discharges.

Table 5 Little Sycamore Creek Nephelometric Turbidity Units (NTUs)

Date	US1	DS1	US2	DS2	Change	Allowable Range (NTUs)	Allowable Increase (NTU)	Compliance (Yes/No)
4/01/19	12.3	15.7			-3.4	0-50	10	Yes
4/25/19			3.3	5.0	+1.7	0-50	10	Yes

Per the Basin Plan Water Quality Objectives, waters shall be free of changes in turbidity that cause nuisance or adversely affect beneficial uses. Increases in natural turbidity attributable to controllable water quality factors shall not exceed the following limits: where natural turbidity was between 0 and 50 NTU, increases shall not exceed 10 NTU.

3.2 Permit Compliance

Los Angeles District RPG 63 states that diversion activities shall not result in the degradation of beneficial uses or exceedance of water quality objectives of the receiving waters. Surface water was successfully diverted around the work area, and results of water quality sampling at the US2 and DS2 locations reveal that project work did not diminish the quality of habitat for any native species downstream. Therefore, the project was in compliance with Basin Objectives regarding pH, temperature, dissolved oxygen, and turbidity on all sample days. The following is a discussion of the project’s compliance with the Basin Plan Water Quality Objectives for each constituent.

Dissolved Oxygen

Per the Basin Plan Water Quality Objectives, at a minimum, the mean annual dissolved oxygen concentration of all waters shall be greater than 7 mg/L, and no single determination shall be less than 5.0 mg/L, except when natural conditions cause lesser concentrations. The dissolved oxygen content shall not be depressed below 5 mg/L as a result of waste discharges.

As shown in Table 2, the dissolved oxygen values for all water samples were above the minimum requirement of 5.0 mg/L. Therefore, the project was in compliance with Basin Objectives regarding dissolved oxygen on all dates.

pH

Per the Basin Plan Water Quality Objectives, the pH of inland surface waters shall not be depressed below 6.5 or raised above 8.5 as a result of waste discharges. Ambient pH levels shall not be changed more than 0.5 units from natural conditions as a result of waste discharge.

As shown in Table 3, the pH values for the post-construction sample points were within the allowable range of 6.5 - 8.5 and showed no substantial (greater than 0.5) changes in pH between the upstream sampling and the downstream sampling points. However, the pre-diversion results revealed the US1 sample (pH of 8.65) was outside of the Basin Objectives. This heightened pH was not a result of project activities, as work in the creek upstream of this point did not occur prior to conducting the sample. The elevated pH was likely caused by the burned material that continued to move downstream at the time of the sample. After diversion activities were completed, the US2 and DS2 sampling results (pH of 8.10 and 8.00) revealed that construction activities did not adversely affect the pH of Little Sycamore Creek and are in compliance with the Basin Objectives.

Temperature

Per the Basin Plan Water Quality Objectives, water temperature shall not be altered by more than 5 degrees Fahrenheit above the natural temperature and WARM-designated waters shall not be raised above 80 degrees Fahrenheit as a result of waste discharges.

As shown in Table 4, temperature readings for all water samples were within 5 degrees Fahrenheit from upstream to downstream and less than 80 degrees Fahrenheit. The project was in compliance with the Basin Objectives regarding temperature for all sampling days.

Turbidity

Per the Basin Plan Water Quality Objectives, waters shall be free of changes in turbidity that cause nuisance or adversely affect beneficial uses. Increases in natural turbidity attributable to controllable water quality factors shall not exceed the following limits: Where natural turbidity is between 0 and 50 nephelometric turbidity units (NTU), increases shall not exceed 20 percent, or 10 NTU.

As shown in Table 5, turbidity sampling results indicated no exceedance of 10 NTUs between the upstream and downstream for all sampling dates when natural turbidity was between 0 and 50 NTUs. The project was in compliance with the Basin Objectives regarding turbidity on all sample days.

4 Project Compliance

4.1 Emergency Coastal Development Permit

The following discusses the compliance with the requirements of the Emergency Coastal Development Permit (Case No. PL19-0005), issued by Ventura County Planning Division, for the project. All permit conditions were understood and met during execution of the project. Selected conditions, and compliance actions taken, are described below.

BIO-1: Construction During a Rain Event. No work was conducted during times of precipitation. Water diversion activities did not result in the degradation of beneficial uses or exceedance of water quality objectives to Little Sycamore Creek. Biologists were monitoring during all work within the creek and increased turbidity levels were not observed. Water quality data results (see section 3.1) did not reveal adverse impacts to the creek. Contractors utilized clean sand within sand bags that were wrapped in visqueen plastic for the diversion. Materials for the diversion were lowered into the channel via equipment that did not enter the creek. Normal flows during project work, and after project completion, were observed within the creek.

BIO-2: BMP to Prevent Erosion. Spoils removed from the creek were sorted and stockpiled in flat areas in middle camp (Figure 3 and Figure 4). Contaminants (i.e., trash, debris, asphalt, etc.) from project activities were removed from the site after it was sorted out of the creek spoils. Suitable material free of contaminants was used to recontour an eroded slope east of the creek. All trees along the bank, including dead or damaged trees, were left in place for stabilization purposes.

BIO-3: Night Construction Avoidance. No nighttime work occurred.

BIO-4: Temporary Access into Little Sycamore Creek. A pre-existing road was utilized to access entry into the creek. No temporary access roads were graded to gain entry into the creek. Areas of temporary disturbance were minimized to the extent practicable.

BIO-5: Staging Equipment. The staging area (Figure 4) occurred in an unvegetated, previously disturbed site that is located outside the creek (i.e., within a pre-existing parking lot). Fiber rolls were installed around the staging and storage areas (Appendix A, Photographs). Fueling, lubrication, maintenance, storage, and staging of vehicles and equipment did not result in a discharge to the creek. Dump trucks were also staged outside of the creek and within the staging area or outside of the limits of Camp Hess property.

BIO-6: Pollutant Management. All vehicles and equipment not in use were confined to the designated staging area. Visqueen plastic surrounded by straw wattles were placed below equipment to contain any possible leaks. The pump generator was staged outside of the channel and had secondary containment underneath to capture potential leaks. No leaks were observed from vehicles or equipment.

BIO-7: Material Storage. Spoil materials removed from the creek were sorted and stockpiled in the stockpile areas that were located 100 feet away from the creek (Figure 3 and Figure 4). Fiber rolls were installed along the perimeter of the stockpiles to contain spoil material.

BIO-8: Pollution Prevention. Silt or pollutants were not observed to be discharged off the site or within the creek during project activities. Fiber rolls and visqueen plastic were used to contain stockpiles that occurred on the site.

BIO-9: Site Materials and Refuse Management. All trash was observed to be disposed of in closed containers that were removed from the project area each day during the construction period. Construction personnel did not feed or attract wildlife to the construction area. After the project was completed, all project-generated debris, vehicles, building materials, and rubbish was removed from the working area.

BIO-10: Re-fueling and Maintenance. All re-fueling, cleaning, and maintenance occurred at least 100-feet from Little Sycamore Creek.

4.2 RGP 63

The following discusses the compliance with the requirements of the RGP 63 Verification Letter (File No. SPL-2018-00038-CLH) (amended on March 28, 2019) issued by the USACE for the project. All permit conditions were understood and met during execution of the project. Selected conditions, and compliance actions taken, are described below.

Special Condition 1. All project work conducted was the minimum necessary to alleviate the immediate emergency. In addition, project work did not result in significantly increased adverse impacts to aquatic resources (see section 3.1 for water quality sampling results). Heightened turbidity levels from project activity were not observed. No riparian and/or native vegetation was impacted.

Special Condition 2. This report serves as the Project Completion Report that is required via General Condition 26.

- Applicant name: Doug Lynn
- Applicant address: 3663 Wilshire Boulevard, Los Angeles, CA 90010
- Applicant e-mail address: doug@wbtcamps.org
- Applicant phone number: (213) 835-2196

Special Condition 3. No discoveries of human remains, archeological deposits, or any other type of historical property were made during project activities.

Special Condition 4. The limits of the project area were marked with wooden stakes and flagging to ensure mechanized equipment did not enter areas beyond the USACE-approved construction footprint.

Special Condition 5. A monitor was present and observing turbidity levels during all work that occurred within the creek. Heightened turbidity was not observed during any of the in-creek work. As stated prior, the RGP 63 Verification Letter was amended to permit water diversions during the project to limit adverse impacts to Little Sycamore Creek. Once the amendment was received, the contractors built a series of water diversions to eliminate the contact between equipment and Little

Sycamore Creek. After the permit was amended, no equipment entered or made contact with Little Sycamore Creek. All water diversions were constructed by hand and with an excavator lowering the sandbags into the creek while staged outside the channel (Appendix A, Project Photographs). Clean sand was used in the super sacks and sand bags. The Super sacks were wrapped with visqueen to prevent any material from entering the creek. Sandbags and straw wattles were staged within the project area in case heightened turbidity was observed.

As stated in section 3.1, water quality monitoring before and after diversions were constructed, at a point upstream of the diversion and a point downstream of the diversion. The project was in compliance with the Basin Objectives (i.e., dissolved oxygen, pH, temperature, and turbidity) after the deconstruction of all diversions.

Construction Condition 1. A spill response kit and pumps were maintained on the site to respond to a spill or inadvertent release of materials that had the potential to reach Little Sycamore Creek. No spills or inadvertent releases occurred during project activities.

Construction Condition 2. Fueling, lubrication, maintenance, storage, and staging of vehicles and equipment were located within the staging area, in an area where accidental spills would not enter or affect Little Sycamore Creek. Fiber rolls were placed around the staged equipment with visqueen plastic under to capture any accidental spilled fluids.

Construction Condition 3. Construction related materials did not reach Little Sycamore Creek during project activities.

Construction Condition 4. Construction materials and debris from all work areas were removed from the site and disposed of following project completion.

Construction Condition 5. Project activities, including water diversion activities, did not result in the degradation of beneficial uses or exceedances of water quality objectives of any of the receiving waters. All temporary coffer dams were built from materials that caused no siltation (i.e., clean gravel in bags surrounded by visqueen and flex-pipe). Normal flows were observed throughout, and immediately upon completion, of work within diversion locations.

Construction Condition 6. Effective BMPs were implemented to control erosion and runoff associated with the emergency project. BMPs on the site included straw wattles and sandbags on the site during construction activities, construction tape and stakes delineating the working area within the creek, secondary containment under restroom and staged equipment, spill kits onsite at all times during construction, staged equipment stored in the staging area, and heavy equipment/materials raised and lowered into channel from outside of the creek. The pump generator was staged outside of the channel and had secondary containment underneath to capture potential leaks. No areas of temporary impacts or disturbances resulted in a discharge or a threatened discharge to Little Sycamore Creek; therefore, no restoration was necessary.

Construction Condition 7. All project work conducted was the minimum necessary to alleviate the immediate emergency. In addition, project work did not result in significantly increased adverse impacts to aquatic resources (see Section 3.1 for water quality sampling results). Biological monitors were present for all in-creek work and were observing turbidity within the creek. Heightened turbidity levels from project activity were not observed. No riparian and/or native vegetation was impacted. Bioremediation, other environmentally sensitive solutions, and restoration work was not conducted.

Water Quality Monitoring Condition A. Surface water was present during the duration of project activities. Biologists were on the site to monitor all work that was conducted in the creek (i.e.,

equipment removing sediment from the creek prior to the permit amendment, installing diversions, deconstructing diversions). No oil and grease was observed to be spilled or leaking during project activities. Turbidity was continuously visually monitored was not observed to be increased during in-creek project work.

Water Quality Monitoring Condition B. No discharges of hazardous material or violations of compliance with water quality standards occurred during project activities (see section 3.1 for water quality sampling results).

General Condition 9. No adverse modification of designated critical habitat or 'take' of a listed threatened or endangered species occurred during project activities.

Appendix A

Project Photographs



Photograph 1. View of fire debris on the pre-existing road and bridge (facing east) (2/15/19).



Photograph 2. View of pre-existing road and bridge, looking upstream within Little Sycamore Creek (facing north) (2/15/19).



Photograph 3. View of equipment staged outside of the creek and removing sediment from the creek (facing south) (3/5/19).



Photograph 4. Visqueen and straw wattles placed around the stockpiles (3/19/19).



Photograph 5. Constructing Diversion 1. Note excavator lowering super sacks into the channel (facing south) (4/1/19)



Photograph 6. Visqueen and straw wattles around equipment in the staging area (4/2/19).



Photograph 7. Completing the temporary, upstream coffer dam of Diversion 1. Note visqueen around super sacks to avoid sedimentation within the creek (4/2/19).



Photograph 8. Ground water accumulating within the project area that was pumped out of the channel (facing north) (4/8/19).



Photograph 9. Completed, temporary, upstream coffer dam of Diversion 2 (facing northwest) (4/8/19).



Photograph 10. Completed, temporary, upstream coffer dam of Diversion 3 (4/16/19).



Photograph 11. View of creek within Diversion 1 location, post-diversion removal (facing south) (4/25/19).



Photograph 12. View of creek within Diversion 1 location, post-diversion removal (facing south) (4/25/19).

Appendix B

Water Quality Monitoring Logs

Surface Water Quality Sampling and Observations

Date: 4/1/19

Project Name: Camp Hess Kramer

Rainfall within past 24 hours: NO

Start time: 0820

Stop time: 0845

Weather: 100% cloud cover, 0-3mph, 67°F

Comments: Pre-diversion (1)

Monitor: Danielle Yaconetti

DOWNSTREAM Location						Notes (weather, flow description, etc.)
Sample ID	Temp (°C)	pH	D.O. (mg/L)	TSS (mg/L)	Turbidity (NTU)	
DS1	13.6	8.34	10.8	/	16.0 15.0 16.0 } 15.67	
Sample location/type: <u>Center of channel, grab sample</u>						
Water/Creek condition: <u>clear</u>						
Activities during sampling: <u>working outside of creek</u>						
Disturbances to creek/sampling area: <u>N/A</u>						

MONITORING NOTES:

DS1: 34.058909, -118.965739
 US1: 34.060348, -118.9654404

Sampling occurred prior to the initial diversion installation. Contractor gave an US location and then measured 500ft. downstream for the DS location. Sampling occurred ~ 15 ft US + DS of diversion.

UPSTREAM Location						Notes (weather, flow description, etc.)
Sample ID	Temp (°C)	pH	D.O. (mg/L)	TSS (mg/L)	Turbidity (NTU)	
US1	13.8	8.64	10.7	/	10.0 13.0 14.0 } 12.33	
Sample location/type: <u>center of channel, grab sample</u>						
Water/Creek condition: <u>clear</u>						
Activities during sampling: <u>working outside of creek</u>						
Disturbances to creek/sampling area: <u>N/A</u>						

Surface Water Quality Sampling and Observations

Date: 4/25/19

Project Name: Camp Hess Kramer

Rainfall within past 24 hours: No

Start time: 0750

Stop time: 0800

Weather: 56°F, 100% cloud cover, Amph

Comments: Post-Diversion 3

Monitor: Danielle Yaconetti

DOWNSTREAM Location						Notes
Sample ID	Temp (°C)	pH	D.O. (mg/L)	TSS (mg/L)	Turbidity (NTU)	
DS3	15.2	8.0	10.0	/	4.70 4.20 6.20 } 5.0	(weather, flow description, etc.)
Sample location/type: <u>center of channel, grab sample</u>						
Water/Creek condition: <u>clear</u>						
Activities during sampling: <u>work outside of creek</u>						
Disturbances to creek/sampling area: <u>None</u>						

MONITORING NOTES:
 DS3: 34.056833, -118.969833
 US3: 34.060909, -118.969624
 Sampling occurred after diversion was removed from the channel

UPSTREAM Location						Notes
Sample ID	Temp (°C)	pH	D.O. (mg/L)	TSS (mg/L)	Turbidity (NTU)	
US3	15.6	8.1	9.5	/	3.70 2.70 3.60 } 3.3	(weather, flow description, etc.)
Sample location/type: <u>center of channel, grab sample</u>						
Water/Creek condition: <u>clear</u>						
Activities during sampling: <u>work outside of creek</u>						
Disturbances to creek/sampling area: <u>None</u>						

Appendix C

Daily Monitoring Logs

Daily Monitoring Report

Monitor(s): Justin MacMartin Date: 2/15/19
Start Time (24 hour): 08:00 Stop Time (24 hour): 17:00 Hours: 8.0
Weather: Cool, overcast. 50-60° F.
Location (Station Numbers or Lat/Long): Camp Hess Kramer

Summary of Activities: Monitoring Pre-construction Survey Other

Daily Activities in Time - Activity Formant (i.e. 07:00-Arrived at project site):

08:00 - Arrived on site and assessed current conditions with Rincón PM Lindsay Griffin.
10:45 - Crew began work. One excavator removed debris and mud from the area directly adjacent and underneath the first bridge, located ~200ft from the parking lot. Stockpile was placed along canyon wall, roughly 100 ft from the creek.
11:15 - A second ~~member~~ crew member began using a backhoe to trench along where the creek originally flowed in order to redirect it.
16:30 - Work wrapped up for the day. Biologist conducted final sweep.
17:00 - All depart.

Summary of Project Related Communications:

Work to resume @ 8:00am on Tuesday 2/19.

Special-Status Species Observations:

None.

COMPLIANCE REMEDIATION ACTION NEEDED (see Non-Compliance Report)

Monitor: J. MacMartin Environmental Lead: _____
Signature Signature

Daily Monitoring Report

Monitor(s): Justin MacMartin Date: 2/19/19
Start Time (24 hour): 09:00 Stop Time (24 hour): 16:30 Hours: 8.5
Weather: Clear, sunny, 4-5 mph wind, 0% cloud cover, 45-65° F.
Location (Station Numbers or Lat/Long): Camp Hess Kramer

Summary of Activities: Monitoring Pre-construction Survey Other

Daily Activities in Time – Activity Formant (i.e. 07:00-Arrived at project site):

08:00 - Arrived at project site and met with maint. superintendent Joe De Corsi and crew.
08:30 - conducted clearance sweep of the work area. No sensitive species observed.
08:45 - crew mobilized and began work (1) backhoe continued to trench in order to redirect the creek back to it's natural location. (1) excavator continued to remove sediment from underneath first bridge. Biologist consulted with crew throughout the day.
12:30 - United Rentals arrived to service equipment (work done outside creek in park lot)
13:30 - crew continued re-channeling the creek, using creek material to build new bank
14:45 - creek successfully diverted, now running along west canyon wall.
16:30 - conducted final sweep. All depart.

Species: ANCR, CALT, BHFA, ANHU, WFSJ, TUVU, RTHA, DEJU,

Summary of Project Related Communications:

Alerted Joe and crew that stockpiles should be moved as to not flow back into creek during upcoming rain event. Joe called Lindsay directly to discuss. Also, confirmed no work will be done in creek. No monitor required until next week.
Special-Status Species Observations: Reminded Joe to document work / BMP's throughout week.

None

COMPLIANCE

REMEDIATION ACTION NEEDED (see Non-Compliance Report)

Monitor: J. MacMartin
Signature

Environmental Lead: _____
Signature

Daily Monitoring Report

Monitor(s): Danielle Yaconelli Date: 2/26/19

Start Time (24 hour): 0800 Stop Time (24 hour): 1400 Hours: 6.0

Weather: 55 - 59°F, 5-10 mph, 100% cloud cover

Location (Station Numbers or Lat/Long): Camp Hess Kramer

Summary of Activities: Monitoring Pre-construction Survey Other

Daily Activities in Time - Activity Formant (i.e. 07:00-Arrived at project site):

0800 - Met Joe Da Corsi (Camp Hess ^{superintendent} onsite. Met machine operators and walked the site. Flow observed within Little Sycamore Creek. No sensitive species observed.

0900 - Crew mobilized and began to use backhoe to trench in order to redirect the creek. Sediment removed was placed outside of the channel.

1130 - United Rentals onsite to service equipment / inflate tires. Lunch occurred during this time.

1200 - Backhoe continued to trench to redirect the creek. Turbidity was not elevated in Little Sycamore Creek during the trenching.

1400 - Crews successfully diverted the channel and were to continue to remove sediment from the roads for the remainder of the day. Biologist offsite.

BMPs observed: low turbidity in the creek, equipment staged on visqueen / gravel bag over 100 ft. from the creek, ~~then~~ some stockpiles covered in visqueen with gravel bags over, trash removed from site daily.

Summary of Project Related Communications:

Don + Pat - Yerba Buena Water Company; Joe + Katherine (Camp Hess).

Recommended to Joe that stockpiles should be moved or reinforced with boulders / BMPs so sediment does not mobilize into creek during the rain event.

Special-Status Species Observations: Also recommended for straw wattles / clean sand on gravel bags to be onsite for turbidity.
None

COMPLIANCE REMEDIATION ACTION NEEDED (see Non-Compliance Report)

Monitor:  Environmental Lead: _____

Signature

Signature

Daily Monitoring Report (Cont.)

Monitor(s): Danielle Yaconelli Date: 3/5/19

Daily Activities (Cont.): BMPs observed onsite:

- wattled all stockpiled material that wasn't considered a berm
- visqueen ~~front~~ gravel bags over all stockpiled material that wasn't a berm
- visqueen under staged equipment
- no leaking equipment observed
- no trash observed around site

Daily Monitoring Report

Monitor(s): Kipp Marzullo Date: March 18, 2019

Start Time (24 hour): 700 Stop Time (24 hour): 1615 Hours: 9.25

Weather: Clear skies, good visibility, 4-7mph winds 60-70F

Location (Station Numbers or Lat/Long): Ex. Bridge #1 and Ex. Bridge #2

Summary of Activities: Monitoring Pre-construction Survey Other _____

Daily Activities in Time – Activity Formant (i.e. 07:00-Arrived at project site):

0630 Arrived at project site
0700 Met Joe DaCorsi and crew
0700-1600 Monitoring removal of debris from beneath Ex. Bridge #1 and Ex. Bridge #2
1600 Conducted final sweep of work areas
1615 Departed site for the day

Summary of Project Related Communications:

Special-Status Species Observations:

COMPLIANCE REMEDIATION ACTION NEEDED (see Non-Compliance Report)

Monitor: Kipp Marzullo Environmental Lead: _____
Signature *Signature*

Daily Monitoring Report

Monitor(s): Kipp Marzullo Date: March 19, 2019

Start Time (24 hour): 700 Stop Time (24 hour): 1615 Hours: 9.25

Weather: Cloudy skies, fair visibility 3-10 mph winds 60F

Location (Station Numbers or Lat/Long): Ex. Bridge #1 and Ex. Bridge #2

Summary of Activities: Monitoring Pre-construction Survey Other _____

Daily Activities in Time – Activity Formant (i.e. 07:00-Arrived at project site):

0630 Arrived at project site
0700 Met Joe DaCorsi and crew
0700-1600 Monitoring removal of debris from beneath Ex. Bridge #1 and Ex. Bridge #2
1600 Conducted final sweep of work areas
1615 Departed site for the day

Summary of Project Related Communications:

Special-Status Species Observations:

COMPLIANCE REMEDIATION ACTION NEEDED (see Non-Compliance Report)

Monitor: Kipp Marzullo Environmental Lead: _____
Signature *Signature*

Daily Monitoring Report

Monitor(s): Danielle Yawonemi Date: 3/29/19

Start Time (24 hour): 0800 Stop Time (24 hour): 0900 Hours: 1

Weather: 60°F, 0% cloud cover, 0-3 mph

Location (Station Numbers or Lat/Long): # Camp Hess Kramer

Summary of Activities: Monitoring Pre-construction Survey Other Monitored
during sediment removal outside of Sycamore Creek

Daily Activities in Time – Activity Formant (i.e. 07:00-Arrived at project site):

0800 - Arrived onsite. Spoke with Oscar. He told me Joe would be out until Tuesday, 4/1/2, and Kristen Culver was directing crews at this time. ~~The~~ The diversion may be going in 4/1 or 4/2, and the contractors installing the diversion would not be onsite until 4/1. Monitor explained to Oscar that the amendment to the RGP 63 did not authorize work in water, and also authorized an in-stream diversion to be in place. Oscar ensured no work in water would occur onsite, and the crew would be moving sediment out of water onto the bank.

0830 - Kristen Culver arrived onsite. Monitor reiterated the authorization of the diversion, and ~~she~~ restated per the RGP 63 amendment no work in water within Sycamore Creek should occur. She clarified the diversion contractors would be onsite on Monday. Monitor explained that water quality sampling was required prior and post to water diversion install/deconstruction, and the water diversion should be entirely deconstructed prior to a rain event that may "blow out" the system. Monitor pointed out these sections in the amended


Summary of Project Related Communications:

Spoke with Oscar, Kristen Culver, and Lindsay Griffin.

Special-Status Species Observations:

None

COMPLIANCE REMEDIATION ACTION NEEDED (see Non-Compliance Report)

Monitor:  Environmental Lead: _____
Signature Signature

Daily Monitoring Report (Cont.)

Monitor(s): Danielle Yaconelli Date: 3/29/19

Daily Activities (Cont.): permit, and left the permit onsite with Kirsten.
0900- Monitor offsite.

Daily Monitoring Report

Monitor(s): Danielle Yaconelli Date: 4/1/19

Start Time (24 hour): 0800 Stop Time (24 hour): 1530 Hours: 7.5

Weather: 67°F, 100% cloud cover, 0-3 mph

Location (Station Numbers or Lat/Long): Camp Hess Kramer

Summary of Activities: Monitoring Pre-construction Survey Other Construction of Diversion #1

Daily Activities in Time – Activity Formant (i.e. 07:00-Arrived at project site):

0800 - Spoke with Oscar on the site. He led me to the contractors (LDI) to be constructing the diversion. Martin (foreman, LDI) explained they would be using super sacks (2 high) on the upstream end of the diversion with 500 ft. of flex pipe running downstream. He stated only clean sand would be used in the super sacks and they would be sealed to ensure no fill would enter the creek.

0820 - Monitor conducted water quality sampling ~ 15 ft. US/DS of the proposed diversion (DO, temperature, turbidity, pH) and logged it in a separate field sheet. Also conducted sweep of creek - no species observed.

0845 - Amy (LDI PM) arrived onsite + spoke to the monitor. ~~She~~ confirmed all previous information about diversion. Amy left the site.

1000 - Clean sand delivered to the paved staging area. Contractors began filling super sacks with clean sand and staging them next to the diversion area.

1200 - 1230 - lunch

1230 - Contractors continued to fill super sacks with sand and drive them to the diversion area.

Summary of Project Related Communications:

Spoke with Amy + Martin (LDI), Kristen + Oscar (Camp Hess Kramer)

Special-Status Species Observations:

None

COMPLIANCE

REMEDIATION ACTION NEEDED (see Non-Compliance Report)

Monitor:


Signature

Environmental Lead:

Signature

Daily Monitoring Report (Cont.)

Monitor(s): Danielle Yawoneti Date: 4/1/19

Daily Activities (Cont.): 1400 - Contractors staged corrugated pipe adjacent to the creek. Also began clearing gravel from concrete pad where the upstream portion of the diversion ~~is~~ is proposed. All work within creek was done with shovels/hand tools.
1550 - Contractors finished up for the day - bio offsite.

Daily Monitoring Report

Monitor(s): Danielle Yaconelli Date: 4/2/19

Start Time (24 hour): 0700 Stop Time (24 hour): 1530 Hours: 8.5

Weather: 50% cloud cover, 5-10mph, 58°F

Location (Station Numbers or Lat/Long): Camp Hess Kramer

Summary of Activities: Monitoring Pre-construction Survey Other Diversion Installation

Daily Activities in Time – Activity Formant (i.e. 07:00-Arrived at project site):

0700 - Arrived onsite. Swept the site for biological activity. None observed. Spoke with Joe about diversion plan, length, logistics. Updated him on the RGP63 amendment - how equipment should not work in water, if pumping is occurring it cannot be downstream, equipment should be staged in the parking lot, diversion should be water tight, bio. monitor should be onsite during diversion construction, demolition, and to conduct water quality sampling.

Crews began to work on water diversion. Sand bags (filled with clean sand), 10mm visqueen, ~~and~~ super sacks (filled with clean sand), and flex pipe was used to create the upstream diversion wall. No turbidity plumes were observed downstream.

1100 - Lunch

1115 - Monitor observed Corvid nest (potentially active) above parking lot. Alerted Joe to the nest.

1145 - crews continued to work on diversion. Excavator and backhoe worked outside of active channel and removed debris. Groundwater was percolating out of

Summary of Project Related Communications:

Spoke with contractors, Joe, and Lindsay.

Special-Status Species Observations:

None.

COMPLIANCE

REMEDIATION ACTION NEEDED (see Non-Compliance Report)

Monitor:


Signature

Environmental Lead:

Signature

Daily Monitoring Report (Cont.)

Monitor(s): Danielle Yaconelli Date: 4/2/19

Daily Activities (Cont.): the ground outside of active channel, so contractor began
pumping water out of the working area and watered the road with it.
Pumped ground water did not touch surface water.

Monitor suggested to Joe that a DS coffer dam be installed to capture
any surface water that may leak within active channel.

Contractor bermed the groundwater that was exposed so that it would not
flow downstream.

1530 - Monitor offsite.

Daily Monitoring Report

Monitor(s): Danielle Yawner Date: 4/3/19

Start Time (24 hour): 0700 Stop Time (24 hour): 0830 Hours: 1.5

Weather: 100% cloud cover, 0 mph, 65°F

Location (Station Numbers or Lat/Long): Camp Hess Kramer

Summary of Activities: Monitoring Pre-construction Survey Other Monitor diversion

Daily Activities in Time – Activity Formant (i.e. 07:00-Arrived at project site):

0700 - Monitor onsite. Corvid still in nest. No materials within 20 ft. of the nest. Walked to diversion and observed it was water tight. Conducted biological sweep of the working area. No biological activity observed.

0815 - Spoke with Joe on the phone. Reiterated importance of keeping surface water and groundwater separated. Contractor will berm any pools that form and pump ground water as needed. Refueling will occur 100ft from the channel. Pump engines will be placed in a secondary containment with spill cloth available as needed. Also reiterated importance of a 20 ft buffer from the active corvid's nest. Observed visqueen under all staged equipment with wattles around it. Joe assured me he would let me know when the deconstruction of the diversion is scheduled to occur.

0830 - Biologist offsite.

Summary of Project Related Communications:

Spoke with Joe regarding surface water / ground water, the active nest onsite, staging of equipment.

Special-Status Species Observations:

None

COMPLIANCE REMEDIATION ACTION NEEDED (see Non-Compliance Report)

Monitor:  Environmental Lead: _____
Signature Signature

Daily Monitoring Report

Monitor(s): Danielle Yaconelli Date: 4/8/19

Start Time (24 hour): 0700 Stop Time (24 hour): 1530 Hours: 8.5

Weather: 100-25% cloud cover, 67°F, 0-5mph

Location (Station Numbers or Lat/Long): Camp Hess frame

Summary of Activities: Monitoring Pre-construction Survey Other Diversion 1 removal, diversion 2 installation

Daily Activities in Time - Activity Formant (i.e. 07:00-Arrived at project site): (contractor)

0700 - Biologist arrived onsite and spoke with Martin about the 2nd diversion plan. Recommended no ~~use~~ equipment touch the water, and hand tools when working in water. Also recommended to install straw wattle downstream of work area to reduce turbidity. Swept the site for biological activity.

0800 - Began removing diversion #1. Biologist conducted water quality sampling upstream and downstream of diversion #2 location. Sand bags, ~~riser~~ riser, and flex pipe from before ~~the~~ used in diversion #2. Straw wattle installed downstream of the diversion. Contractor began assembling upstream dam and it was water tight. Contractors began connecting flex pipe downstream of upstream dam.

1100 - Lunch

1130 - Excavator continued to work outside of the active channel, not touching creek. Some turbidity observed due to the channel reforming within the first diverted area. Contractors continued to work on diversion #2. Corvid nest still observed to be active. Observed corvids flying in and out of the nest. Contractors continued to construct diversion #2. No turbidity plumes observed.

Summary of Project Related Communications:

Spoke with contractors, Joe, Amy (Landscape Dev.)

Special-Status Species Observations:

None



COMPLIANCE



REMEDIACTION ACTION NEEDED (see Non-Compliance Report)

Monitor:



Signature

Environmental Lead:

Signature

Daily Monitoring Report (Cont.)

Monitor(s): Danielle Vaconevi Date: 4/8/19

Daily Activities (Cont.):

1500 - Contractors began cleaning up all material in the creek.
1530 - Monitor offsite for the day.

Daily Monitoring Report

Monitor(s): Danielle Yaconelli Date: 4/9/19

Start Time (24 hour): 0700 Stop Time (24 hour): 1430 Hours: 7.5

Weather: 100% cloud cover, 10-15 mph, 60-70°F

Location (Station Numbers or Lat/Long): Camp Hess Kramer

Summary of Activities: Monitoring Pre-construction Survey Other Diversions #2
Installation

Daily Activities in Time – Activity Formant (i.e. 07:00-Arrived at project site):

0700 - Biologist onsite. Conducted sweep of active project area. No species observed. Contractor continued to construct diversion #2. 2 more straw wattle berms created downstream of project activity to reduce turbidity. Continued to remove flex pipe from diversion #1.

1015 - All components from diversion #1 removed from channel. Monitor conducted post-diversion water quality sampling for diversion #1. Contractors continued to install diversion #2. Abatement consultants arrived onsite to look at burned buildings.

1100 - Lunch
1130 - Contractors continued to construct diversion #2. Excavator continued to work outside of the active channel, not touching the creek. Corvid nest still observed to be active. No turbidity plumes observed. Monitor observed a pair of house finches building a nest in one of the abandoned buildings next to the staging area. Contractors + monitor confirmed no chicks or eggs were in the nest, then removed the nest from the building. ~~Monitor~~ Diversion 2 observed to be complete and water tight. Contractor agreed to continue to pump

Summary of Project Related Communications:

Spoke with Joe + contractors regarding pumping ground water, covering stockpiles and nesting birds.

Special-Status Species Observations:

None.

COMPLIANCE REMEDIATION ACTION NEEDED (see Non-Compliance Report)

Monitor:  Environmental Lead: _____
Signature Signature

Daily Monitoring Report (Cont.)

Monitor(s): Danielle Yaconelli Date: 4/9/19

Daily Activities (Cont.): all groundwater that is come across out of the creek.
1430 - Biologist offsite.

Daily Monitoring Report

Monitor(s): Justin MacMartin Date: 4/15/19

Start Time (24 hour): ~~0700~~ 0715 Stop Time (24 hour): 0830 Hours: 1.25

Weather: 50% cloud cover, 1-2 mph wind, 53-65°F

Location (Station Numbers or Lat/Long): Camp Hess Kramer

Summary of Activities: Monitoring Pre-construction Survey Other water sampling training

Daily Activities in Time - Activity Formant (i.e. 07:00-Arrived at project site):

0715 - Biologists Justin and Danielle on site. Walked site and observed all BMPs in place and working.

0730 - water quality sampling training.

0815 - Received word from Oscar that the diversion installation crew will not be on site today. Called Joe to confirm.

0830 - Biologists off site.

Summary of Project Related Communications:

Confirmed tomorrow's work w/ Joe.

Special-Status Species Observations:

None

COMPLIANCE

REMEDIATION ACTION NEEDED (see Non-Compliance Report)

Monitor: J. MacMartin Environmental Lead: _____
Signature Signature

Daily Monitoring Report

Monitor(s): Justin MacMartin Date: 4/16/19

Start Time (24 hour): 07:00 Stop Time (24 hour): 15:00 Hours: 8.0

Weather: 100% cloud cover. 1-2 mph wind. 55-60°F.

Location (Station Numbers or Lat/Long): Camp Hess Kramer

Summary of Activities: Monitoring Pre-construction Survey Other Diversion #2 removal. Diversion #3 installation

Daily Activities in Time - Activity Formant (i.e. 07:00-Arrived at project site):

- 07:00 - Arrived on site and conducted clearance sweep. No sensitive species observed.
- 07:05 - was informed of an unintentional water discharge that occurred while biologists were offsite yesterday (4/15) at around 11:00. crew (unrelated to this project) working on Yerba Buena Rd ruptured a water pipe resulting in heavy water flowing into this project site and creek for ~ 2 hrs. occurred ~ 500 ft. upstream of 3rd bridge on the E side of creek. Water sampling showed no increase in turbidity as of this morning. Creek area is muddy overall.
- 07:15 - Conducted water quality test ^{115 ft.} DS of 3rd diversion.
- 08:00 - monitored while crew simultaneously removed diversion #2 while installing #3. Sand bags, visqueen, and flex pipe ~~was~~ caused from diversion #2. NO equipment entered flowing water.
- 11:15 - Conducted water quality test post-construction of diversion #2, ~15 ft upstream.
- 13:30 - continued monitoring while crew installed flex pipe downstream of ^{diversion} #3.

Summary of Project Related Communications:

was informed of yesterday's unintentional water discharge.

Special-Status Species Observations:

none

COMPLIANCE

REMEDIATION ACTION NEEDED (see Non-Compliance Report)

Monitor: J. MacMartin Environmental Lead: _____
Signature Signature

Daily Monitoring Report (Cont.)

Monitor(s): Justin MacMartin

Date: 4/16/19

Daily Activities (Cont.):

- 14:30 - Reminded Joe of 20' corvid nest buffer. Vehicle was temporarily parked next to tree w/ nest.
- 14:45 - Crew began cleaning up, conducted final sweep
- 15:00 - Departed

Daily Monitoring Report

Monitor(s): Justin MacMartin Date: 4/17/19

Start Time (24 hour): 07:00 Stop Time (24 hour): 15:00 Hours: 8.0

Weather: clear, good visibility, 0 wind, 68°F

Location (Station Numbers or Lat/Long): Camp Hess Kramer

Summary of Activities: Monitoring Pre-construction Survey Other _____

Diversion #3 installation

Daily Activities in Time - Activity Formant (i.e. 07:00-Arrived at project site):

07:00 - Arrived on site and conducted clearance sweep.

07:15 - Performed water quality test on DS portion of diversion #3 post construction.

08:30 - Monitored while crew finished connecting flex pipe for diversion #3. NO work was done in the water with equipment other than hand tools.

11:00 - Spotted House Wren building nest in sycamore tree on W bank of creek across from amphitheater, 20-25' high. Alerted crew.

13:15 - Informed SOE of potentially active nest.

14:00 - Crew finished installing flex pipe for diversion #3, cleaned up all materials, and began demobilizing.

14:30 - used extension ladder to check nest status of House Wren. Nest not active. Nest removed. GPS: (34.0577252, -118.9659993)

14:45 - conducted final sweep.

15:00 - Departed site.

Summary of Project Related Communications:

Informed SOE about potentially active House Wren nest.

Special-Status Species Observations:

None

COMPLIANCE

REMEDIATION ACTION NEEDED (see Non-Compliance Report)

Monitor: J. MacMartin

Signature

Environmental Lead: _____

Signature

Daily Monitoring Report

Monitor(s): Danielle Yawonemi Date: 4/24/19

Start Time (24 hour): 0700 Stop Time (24 hour): 1215 Hours: _____

Weather: 57-65°F, 100% cloud cover, 0-3mph

Location (Station Numbers or Lat/Long): Camp Hess Kramer

Summary of Activities: Monitoring Pre-construction Survey Other Deconstructing
Diversion #3

Daily Activities in Time – Activity Formant (i.e. 07:00-Arrived at project site):

0700 - Biologist arrived onsite. Conducted sweep of working area. Observed ^{confirmed} active house finch nest within a tractor staged in the staging area. Immediately called Joe to recommend a 30-40 ft buffer around the nest, excluding the access road, because the individuals are tolerant of the road already. Recommended the tractor not be moved, and a fence be placed around the buffer area so it is clear, and no one works within that zone. Spoke with Lindsay to confirm. Contractors began deconstructing the diversion. Corvid nest confirmed inactive and fledglings have left the nest. ~~Area~~ ~~Buffer~~ Construction tape was placed at the buffer so no individuals will walk in or out of the buffer zone. Reminded Joe that all materials should be staged within the staging area, outside the buffer.

1030 - Lunch

1100 - continued deconstructing the diversion

1215 - Kipp, the other bio monitor, arrived onsite. Initial bio monitor left the site.

Summary of Project Related Communications:

Spoke with Joe regarding the nest buffer, what is approved through the emergency permit, and how equipment should be staged in staging area.

Special-Status Species Observations:

None

COMPLIANCE

REMEDIATION ACTION NEEDED (see Non-Compliance Report)

Monitor: _____



Signature

Environmental Lead: _____

Signature

Daily Monitoring Report

Monitor(s): K.P.P. Marzallo Date: Apr 24, 2019
Start Time (24 hour): 1130 Stop Time (24 hour): 1530 Hours: 4
Weather: 65 F clear sky wind 4-7 mph
Location (Station Numbers or Lat/Long): Camp Hess Kramer

Summary of Activities: Monitoring Pre-construction Survey Other

Daily Activities in Time - Activity Formant (i.e. 07:00-Arrived at project site):

1130 Arrived on site and received debriefing from Danielle Yaconelli
1242 observed male house finch visit previously discovered nest in front end loader
1200-1515 observed crew removing diversion pipe sections from creek by hand.
1515 conducted sweep of work area and reminded workers from Sanchez to stage mini excavator on BMP containment.
1530 departed site.

Summary of Project Related Communications:

Communicated with work crews to ensure compliance with permits.

Special-Status Species Observations:

None

COMPLIANCE REMEDIATION ACTION NEEDED (see Non-Compliance Report)

Monitor:  Environmental Lead: _____
Signature Signature

Daily Monitoring Report

Monitor(s): Danielle Yaconelli Date: 4/25/19

Start Time (24 hour): 0700 Stop Time (24 hour): 0845 Hours: 1.75

Weather: 56°F, 100% cloud cover, 0mph

Location (Station Numbers or Lat/Long): Camp Hess Kramer

Summary of Activities: Monitoring Pre-construction Survey Other Division #3
water quality sampling, nest monitoring

Daily Activities in Time – Activity Formant (i.e. 07:00-Arrived at project site):

0700- Biologist arrived on the site. Observed an active cliff swallow nest above double doors near entrance - approximately 20 ft. from the ground. Spoke with Joe and suggested he use another door as feasible, and to be careful about vibrations of closing doors/ other activities in the area. Also suggested to keep main building door closed to ensure individuals do not enter the building.

0745- Biologist conducted water quality sampling upstream and downstream of diversion #3 because all material has been removed from the creek. No water quality issues observed. Contractors continued to work outside of creek to remove sediment from bank area and place on the stockpile.

0830- Called Joe and suggested BMPs around the stockpile, to remove all construction material from road and place in staging area, and to schedule with Rincon if ~~needed~~ work within the creek (i.e. a diversion is to be installed) should continue. Alerted him of twice weekly spot checks of the site.

0845- Biologist off-site


Summary of Project Related Communications:

Spoke with Joe to ensure compliance with permits / alert him of new nesting bird onsite.

Special-Status Species Observations:

None

COMPLIANCE REMEDIATION ACTION NEEDED (see Non-Compliance Report)

Monitor:  Environmental Lead: _____
Signature Signature

SURVEYOR'S NOTES

1. MAPPING

TOPOGRAPHIC MAPPING WAS COMPILED AT A SCALE OF 1"=60', WITH A TWO FOOT CONTOUR INTERVAL, USING STANDARD PHOTOGRAMMETRIC METHODS AND PROCEDURES BY GOLDEN STATE AERIAL SURVEYS FROM AERIAL PHOTOGRAPHY TAKEN FEBRUARY 2, 2005.

MAPPING IS SUPPLEMENTED NORTH OF THE AERIAL MAPPING LIMIT LINE BY DATA DIGITIZED AND GEOREFERENCED TO SAID AERIAL MAPPING FROM PREVIOUS TOPOGRAPHIC PLANS PROVIDED BY CLIENT. STANTEC CANNOT GUARANTEE THE ACCURACY OF SAID PLANS.

IN SURROUNDING AREAS AROUND LOWER, MID, AND UPPER CAMP, TOPOGRAPHIC MAPPING WAS COMPILED AT A SCALE OF 1"=40', WITH A ONE FOOT CONTOUR INTERVAL, USING STANDARD PHOTOGRAMMETRIC METHODS AND PROCEDURES BY GOLDEN STATE AERIAL SURVEYS FROM AERIAL PHOTOGRAPHY TAKEN FEBRUARY 2, 2005.

MAPPING IS SUPPLEMENTED BY DATA COLLECTED IN A FIELD SURVEY USING CONVENTIONAL METHODS AND PROCEDURES IN MARCH, 2010, AT THE REQUEST OF HOWARD KAPLAN OF CAMP HESS KRAMER.

2. BOUNDARY AND EASEMENT INFORMATION

THE BOUNDARY INFORMATION SHOWN HEREON WAS COMPILED AND GEOREFERENCED FROM ASSESSOR PARCEL MAPS AND IS FOR INFORMATIONAL PURPOSES ONLY. THIS MAP DOES NOT REPRESENT A BOUNDARY SURVEY.

3. BASIS OF BEARINGS AND COORDINATES

THE BASIS OF BEARINGS FOR THIS MAP IS CCS83, ZONE 5, EPOCH 2004.00, AS DETERMINED LOCALLY BY A LINE BETWEEN CONTINUOUS OPERATING REFERENCE STATIONS (CORS) STATION CSCI AND STATION CIRX BEING S 54° 35' 53" E AS DERIVED FROM GEODETIC VALUES PUBLISHED BY THE CALIFORNIA SPATIAL REFERENCE CENTER (CSRC) RESPECTIVELY. DISTANCES SHOWN HEREON ARE GROUND DISTANCES. TO OBTAIN GRID DISTANCES, MULTIPLY BY A FACTOR OF 0.9999679.

4. ELEVATIONS

THE ELEVATIONS SHOWN HEREON ARE NAVD88 BASED UPON CONTINUOUS OPERATING REFERENCE STATIONS (CORS) STATION TOST, HAVING AN ELEVATION OF 1017.13 PER VALUES PUBLISHED BY THE CALIFORNIA SPATIAL REFERENCE CENTER (CSRC) RESPECTIVELY.

PROJECT DIRECTORY

PROPERTY OWNER/APPLICANT:
ALBERTO VALNER, EXECUTIVE DIRECTOR
DOUG LYNN, CAMP DIRECTOR
RICK WATERS, DIRECTOR OF CONSTRUCTION & FACILITIES
C/O CAMP HESS KRAMER
3663 WILSHIRE BLVD.
LOS ANGELES, CA 90010-2703
T: (213) 388-2401
F: (213) 388-2595

PROJECT SITE ADDRESS:
CAMP HESS KRAMER
11495 PACIFIC COAST HIGHWAY (STATE HIGHWAY 1)
MALIBU, CA 92065
T: (310) 457-7861
F: (310) 457-4614

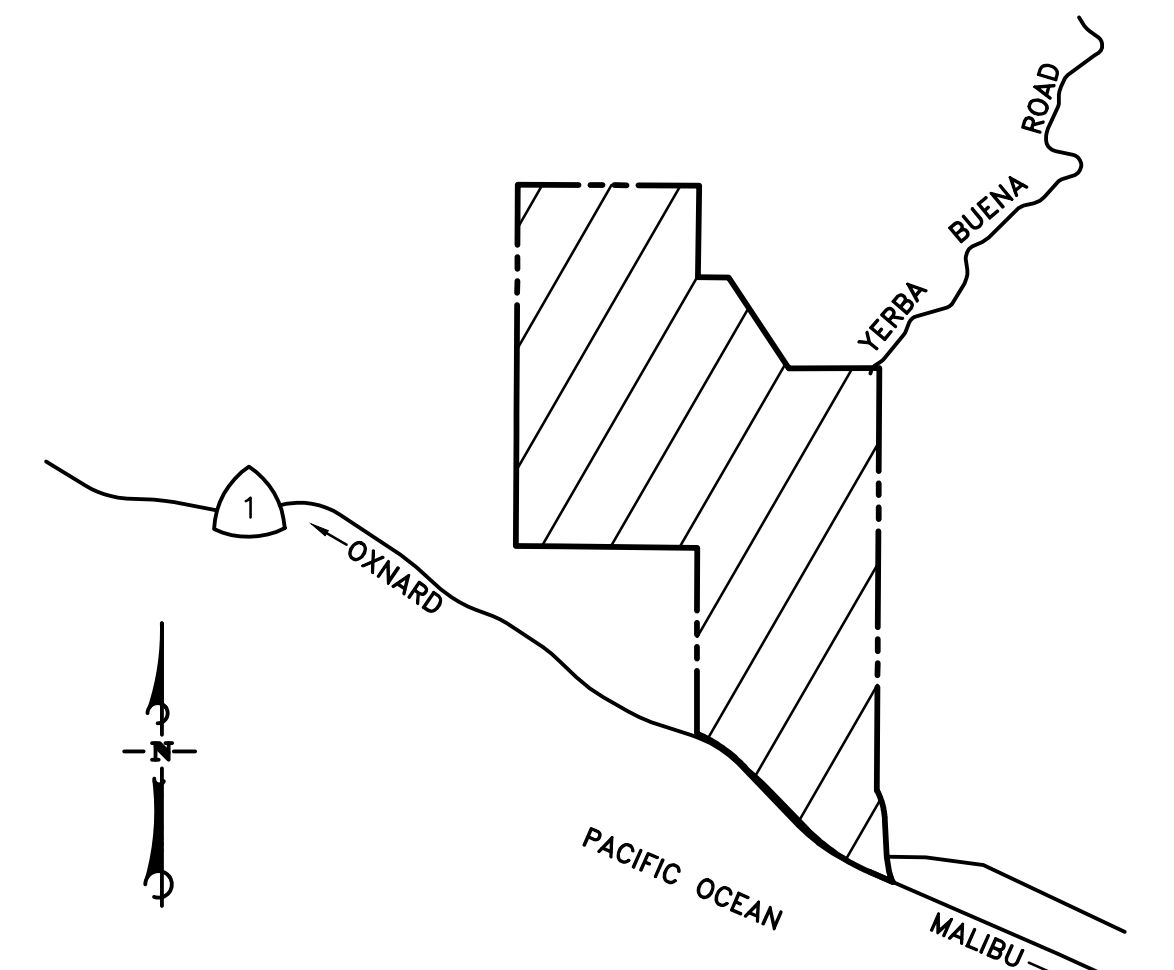
PROPERTY INFORMATION:

ASSESSOR'S PARCEL NUMBERS	ACREAGE	GENERAL PLAN	ZONE DESIGNATION
APN 700-0-070-450	55.90 ACRES	DEVELOPED AREAS: RURAL (2 ACRE MIN.)	DEVELOPED AREAS: COASTAL RESOURCE EXCLUSIVE (CR-20 AC/M)
APN 700-0-060-310	43.23 ACRES	UNDEVELOPED AREAS: OPEN SPACE (10 ACRE MIN.)	UNDEVELOPED AREAS: COASTAL OPEN SPACE (COS-10 AC SFD/M)
APN 700-0-060-140	80.00 ACRES		
APN 700-0-060-260	8.20 ACRES	OPEN SPACE (10 ACRE MIN.)	COASTAL OPEN SPACE (COS-10 AC SFD/M)
TOTAL	187.33 ACRES		

CIVIL ENGINEER:
STANTEC
HADY IZADPANAH, P.E.
111 EAST VICTORIA ST.
SANTA BARBARA, CA 93101
T: (805) 308-9153
F: (805) 966-9801

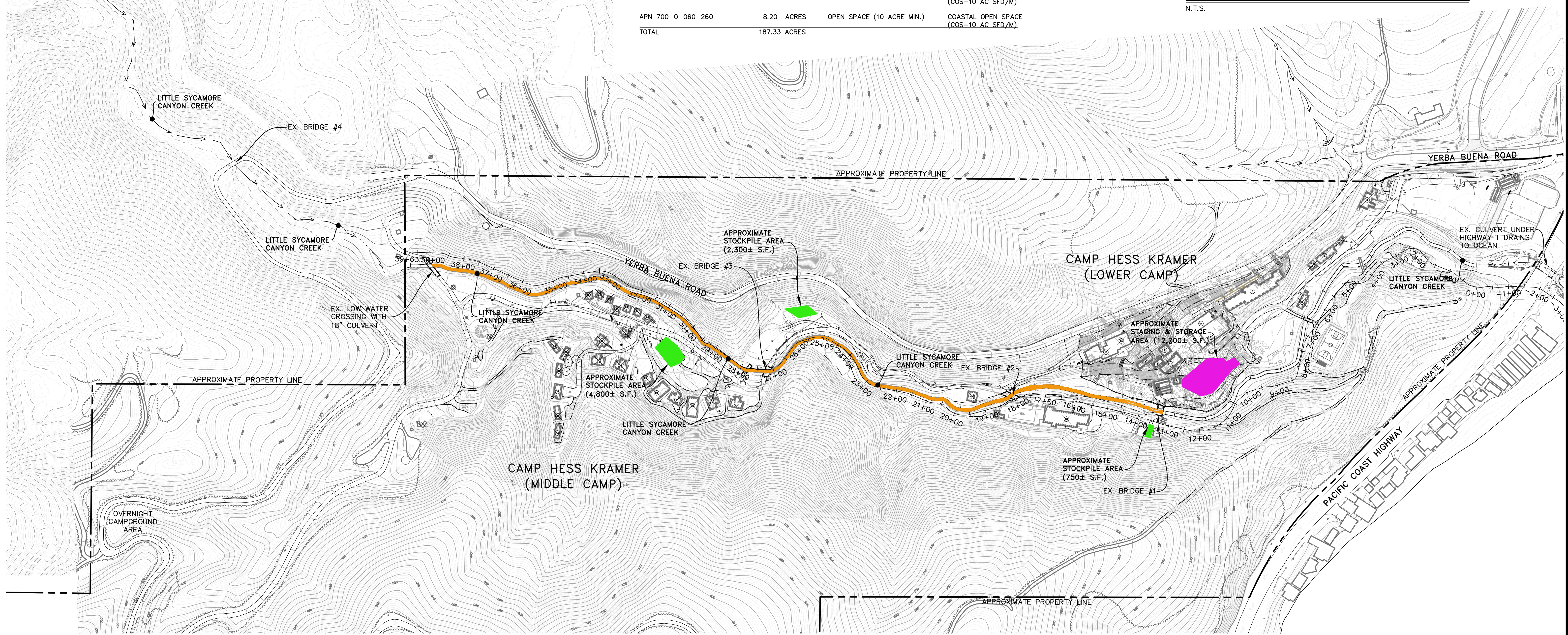
PLANNING:
STANTEC
GINGER ANDERSEN, MCRP AICP
111 EAST VICTORIA ST.
SANTA BARBARA, CA 93101
T: (805) 308-9170
F: (805) 966-9801

ENVIRONMENTAL:
RINCON CONSULTANTS, INC.
LINDSAY GRIFFIN, CISEC CQP
180 NORTH ASHWOOD AVENUE
VENTURA, CA 93003
T: (805) 947-4843



VICINITY MAP

N.T.S.

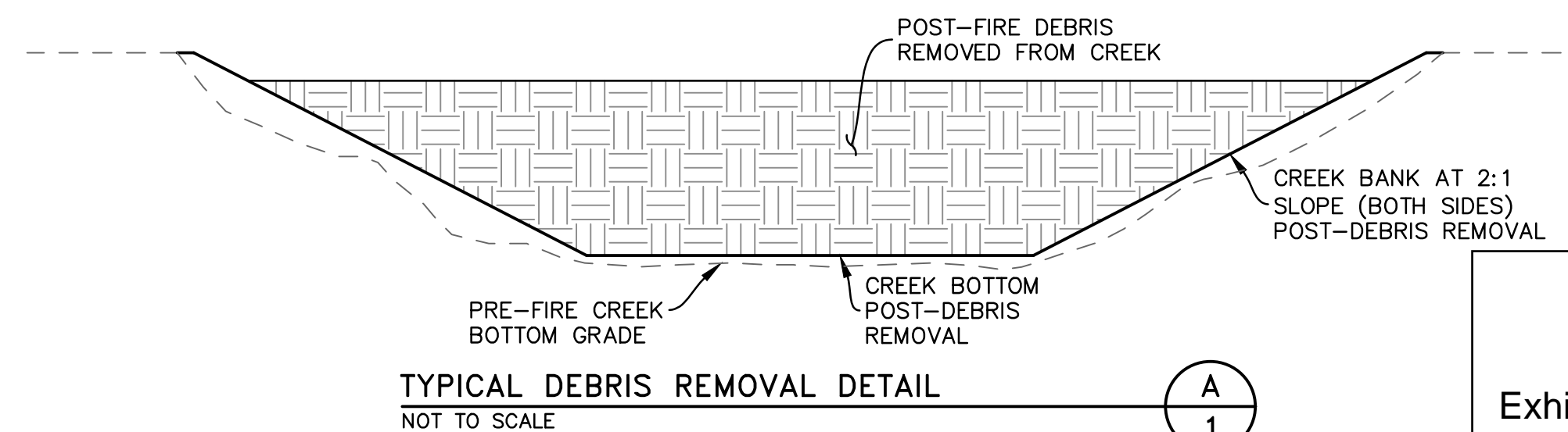


LEGEND

- EXISTING VEHICLE BRIDGE
- DEBRIS REMOVAL AREA
- DEBRIS STOCKPILE AREA
- STAGING & STORAGE AREA

DEBRIS REMOVAL NOTES

1. DEBRIS REMOVAL LIMITS WITHIN EXISTING PRE-FIRE CREEK ALIGNMENT OCCURRED FROM EXISTING BRIDGE #1 AT STA. 13+50 TO EXISTING LOW WATER CROSSING AT STA. 39+00. REFERENCE PROJECT COMPLETION REPORT BY RINCON CONSULTANTS, INC. DATED JUNE 2019.
2. DEBRIS REMOVAL QUANTITY IS APPROXIMATELY 15,000± C.Y. AND STOCKPILED ONSITE.



TYPICAL DEBRIS REMOVAL DETAIL
NOT TO SCALE

A
1

**CAMP HESS KRAMER
WOOLSEY FIRE EMERGENCY RESPONSE
DEBRIS REMOVAL & STOCKPILE AREAS**

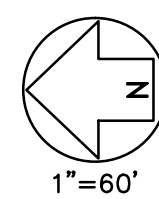
County of Ventura
Planning Director Hearing
PL19-0005
Exhibit 5 - Project Plans, dated January 26, 2022

COUNTY OF VENTURA, CA
1/26/2022

SHEET 1 OF 1



111 East Victoria Street, Santa Barbara, CA 93101
Phone: (805) 963-9532



DRAWING: v:\2064\active\2064134600\engineering\drawing\prelim\eng\channel_grade_control_structure\work\creek_grade_control_structure_sections_update.dwg
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PLOT BY: Hendren, Matthew
36-EXB SAVE DATE: 7/14/2021 5:34:13 PM

county of ventura

MITIGATED NEGATIVE DECLARATION

A. PROJECT DESCRIPTION:

Entitlement: LU10-0069

Applicant: Howard G. Kaplan, Executive Director, Camp Hess Kramer

Location: 11495 and 11677 Pacific Coast Highway, Santa Monica Mountains

Assessor's Parcel Nos: 700-0-060-140, 700-0-060-260, 700-0-060-310, and 700-0-070-450

Parcel Size: Approximately 187 acres

General Plan Designation: "Rural" and "Open Space"

Coastal Area Plan Designation: "Residential Rural 1 DU/2 ac" (Residential Rural, one dwelling unit per two acres) and "Coastal Open Space"

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

Responsible and/or Trustee Agencies:

Los Angeles Regional Water Quality Control Board
California Department of Fish and Wildlife
California Coastal Commission

Project Description:

Camp Hess Kramer, Inc., the applicant, requests approval of a Conditional Use Permit (CUP) to operate a camp known as "Camp Hess Kramer," which will include a campground area, and special events not to exceed 60 events annually. The request is for a CUP life of 20 years with an option to extend the CUP for an additional 20 years with a minor modification. According to the Ventura County Coastal Zoning Ordinance (CZO) (2013) § 8172-1, the proposed uses are defined as follows:

- **Camp:** *A rural facility with permanent structures for overnight accommodation and accessory structures and buildings, which is used for temporary leisure, recreational or study purposes, and provides opportunities for the enjoyment or appreciation of the natural environment.*

800 South Victoria Avenue, L# 1740, Ventura, CA 93009 (805) 654-2481 Fax (805) 654-2509



- Campground: *A rural facility without permanent structures for overnight accommodation, but with limited accessory structures and buildings, which is used for temporary leisure or recreational purposes and provides opportunities for the enjoyment or appreciation of the natural environment.*

Camp Buildings:

The project area covers 187 acres, most of which was previously developed under CUP 1321. The project area contains three distinct camp areas: (1) Camp Hess Kramer (Lower Camp); (2) Camp Hess Kramer (Middle Camp); and, (3) Gindling Hilltop Camp (Upper Camp). All three camp areas are within the limits of the CRE (Coastal Rural Exclusive) zoning designation.

(1) Camp Hess Kramer (Lower Camp) – approximately 17 acres zoned CRE

Camp Hess Kramer (Lower Camp) is located within APN 700-0-060-450. The camp is composed of: an assembly building (i.e., Baruh Hall); a meeting room (i.e., Gildred Hall); an arts and crafts area and separate buildings for restrooms; an infirmary; a dining hall; an adult sleeping quarters; a conference center and adult overnight accommodations; executive and staff housing; a maintenance shop; a staff restroom building; a pool; and, recreation areas. The sizes of the buildings, structures, and areas, are as follows:

Building No.	Use	Area (Square Feet)
1	Chef House	1,922
2	Maintenance Shop	1,250
3	Maintenance Office	393
4	Maintenance Sup. Residence	885
5	Maintenance Restroom	184
6	Conference Center Adult Overnight Accommodations (Two Floors)	13,224
7	Overnight Accommodations (First Floor)	2,100
	Dining Hall (Second Floor)	6,799
8	Kitchen & Restrooms	2,675
9	Camp Office	1,664
10	Infirmary	1,951
11	Infirmary Store Room	238
12	Rooms 41-42	992
13	Rooms 43-45	1,664
14	Gildred Hall	2,960
15	Executive Housing	2,675
16	Arts & Crafts Restroom	420
17	Arts & Crafts	2,113
18	Baruh Hall/Pool Restroom	5,796
19	Pool Pump Building	405
19A	Judy Wolf Lee Dance Stage/Outdoor Assembly Area	625
Shed N	Storage (Shipping Container)	160
Shed O	Storage Shed	120
Shed P	Storage Shed	48
Shed Q	Storage Shed	108
Shed R	Storage (Shipping Containers)	320
Shed S	Storage Shed	48
Shed T	Storage Shed	72
Shed U	Storage Shed	96

Building No.	Use	Area (Square Feet)
Shed V	Storage Shed	42
Shed W	Storage Shed	96
Shed X	Storage Shed	49
Jacuzzi	Jacuzzi	25
TOTAL:		52,119 sq.ft.

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

Camp Hess Kramer (Middle Camp) is located within the portion of the property identified as APN 700-0-060-310. The camp includes 19 guest cabins (some with bathrooms and showers), two shower buildings, and one restroom building, as follows:

Building No.	Use	Area (Square Feet)
20	Cabin 1-2	1,106
21	Cabin 3-4	1,082
22	Cabin 5-6	1,342
23	Cabin 7-8	1,082
24	Cabin 9-10	1,342
25	Cabin 11-30	1,060
26	Cabin 12-13	1,106
27	Cabin 14-15	1,082
28	Cabin 16-17	1,082
29	Piness Village Cabin 18	668
30	Piness Village Cabin 22	668
31	Piness Village Cabin 19	668
32	Piness Village Shower Bldg.	692
33	Piness Village Cabin 21	668
34	Piness Village Cabin 20	668
35	Leadership Village Cabin 1	400
36	Leadership Village Cabin 2	400
37	Leadership Village Cabin 3	400
38	Leadership Village Cabin 4	400
39	Leadership Village Cabin 5	400
40	Leadership Village Cabin 6	400
41	Leadership Village Restroom	345
42	Leadership Village Shower	581
Shed F	Storage Shed (Shipping Container)	320
Shed G	Yerba Buena Pump House	80
Shed H	Yerba Buena Storage	80
Shed I	Storage Shed	56
Shed J	Storage Shed	64
Shed K	Storage Shed	64
Shed L	Storage Shed	16
Shed M	Storage Shed	32
Yerba Buena Water Tank	Yerba Buena Water Tank (47,000 gallon tank for water storage)	452
TOTAL:		18,206 sq.ft.

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

Gindling Hilltop Camp is located within the portion of the property identified as APN 700-0-060-140. The camp includes seven guest cabins with bathrooms

and showers, staff housing, a dining hall, administration office, pool and recreation areas, as follows:

Building No.	Use	Area (Square Feet)
43	Staff Residence	2,882
45	Dining Pavilion	8,045
46	GHC Arts & Crafts	529
47	GHC Pool/Shower/Rec	1,330
48	GHC Pool Pump Bldg.	120
49	Administration	960
50	Guest Cabin 1-2	1,198
51	Guest Cabin 3-4	1,520
52	Guest Cabin 5-6	1,198
53	Guest Cabin 7-8	1,198
54	Guest Cabin 43-44	904
55	Guest Cabin 9-10	1,198
56	Guest Cabin 11-12	1,198
57	GHC Staff Cabin 25-28	1,040
58	GHC Caretaker 21-24	1,040
Shed A	Storage Shed	336
Shed B	Storage Shed	480
Shed C	Storage Shed	400
Shed D	Storage Shed	112
Shed E	Storage Shed	120
Shed E1	Storage Shed	120
TOTAL:		25,928 sq.ft.

Overnight Accommodations:

Pursuant to the CZO (§ 8175-5.4.2.2), the maximum number of persons that are allowed to be accommodated overnight on land that is zoned CRE is based on the following formula:

$$(\text{Lot Size in Acres})(10.24) = \text{the maximum number of persons to be accommodated overnight.}$$

The CUP area includes approximately 25.42 acres of land zoned CRE-10 ac/M (Coastal Rural Exclusive, 10-acre minimum lot size/Santa Monica Mountains Overlay) and approximately 28.93 acres of land zoned CRE-20 ac/M (Coastal Rural Exclusive, 20-acre minimum lot size/Santa Monica Mountains Overlay), for a total of about 54.35 acres of CRE-zoned area. Therefore, overnight accommodations for a maximum of 557 people is allowed [(54.35 acres)(10.24) = 557 people]. The applicant proposes overnight accommodations for up to 549 people. Maximum occupancy includes campers (school children ranging in age from 3rd through 12th grade), camp counselors, adult chaperones, and camp staff. Summer camp sessions range from eight to 27 days. Guests and camp staff will sleep in either of the following areas:

- in cabins and buildings within the CRE-zoned areas of the site; or,

- at an overnight campground site located in the northeast corner of APN 700-0-060-260 (zoned COS-10 ac/M). Guests and camp staff will hike to an area where seven wooden platform structures (8-feet x 18-feet) are used for spending the night outdoors in sleeping bags.

Employees:

Thirty-two full-time employees and six part-time employees will operate Camp Hess Kramer. Of the 32 full-time employees, 11 are full-time residents and six are summer residents during the summer camp season from June through August.

Activities and Uses:

Camp organizers offer a multitude of activities including, but not limited to, archery, basketball, climbing, ropes, soccer, tennis, swimming, hiking, arts and crafts, dancing and singing, and worship.

The camp is private and no daily public use is offered. However, Camp Hess Kramer is available by reservation and lease for group camping from September through May, when the summer camp is not in session.

Pursuant to the CZO (§ 8175-5.4.3.2), the total population allowed on land that is zoned CRE is based on the following formula:

$$(\text{Lot Size in Acres})(20.48) = \text{total population allowed on site.}$$

As discussed in this project description above (under "Overnight Accommodations") the CUP area includes approximately 25.42 acres of land zoned CRE-10 ac/M and approximately 28.93 acres of land zoned CRE-20 ac/M, for a total of about 54.35 acres of CRE-zoned area. Therefore, a maximum daily population of 1,113 people is allowed $[(54.35 \text{ acres})(20.48) = 1,113 \text{ people}]$. The applicant proposes a maximum daily population of 549 persons.

Special Events:

Use of the camp will include outdoor special events [e.g., B'nai Mitzvahs (and the parties) and weddings]. Outdoor event hours of operation will be limited to the months of September through May, Monday through Sunday from 10:00 a.m. to 12:30 a.m. for a maximum of 60 days within the calendar year. Outdoor events are required to end by 12:30 a.m. with lights out and all guests and vendors off the property by 1:00 a.m. While outdoor events will be subject to these time restrictions, some guests will remain on the property after 1:00 a.m. in various overnight accommodations. The proposed outdoor special events will be limited to 549 persons total and shall be limited to areas north of the graded Gil Fitch field at the south end of the camp. Event coordinators will be responsible for making sure guests remain in designated areas. Camp Hess Kramer will provide all rentals (e.g., tables, chairs, linens, china, and silverware), food, and beverages for the outdoor special events. No loudspeakers or sound amplification systems or devices will be used in the Gil Fitch field at any time.

For the proposed special events, athletic fields and courts and open space areas adjacent to developed portions of the property will provide parking to accommodate special events.

Parking and Access:

There are 46 standard parking spaces and two designated handicap parking spaces located within APN 700-0-070-450. Cabins include rear access doors accessible by car to drop off individuals with disabilities. Informal loading spaces are located adjacent to dining halls at Gindling Hilltop (Upper Camp) and Camp Hess Kramer (Lower Camp).

Access to the site is via PCH to Yerba Buena Road to the camp entrance. A paved private road with an average width of 14 feet (20-foot maximum in some areas) provides access to the developed areas (i.e., the Upper, Middle, and Lower camps).

During the summer camp calendar (June through August), guests meet at Wilshire Boulevard Temple Camps Headquarter offices located at 3663 Wilshire Blvd. in Los Angeles. Guests are then brought by bus to Camp Hess Kramer. Upon arrival, guests disembark from the buses and hike to their respective camps. Staff loads vans to deliver luggage to the camp areas and returns luggage to Camp Hess Kramer (“Lower Camp”) at the close of the camp session. During the off-season (September through May), groups are bused in or arrive in personal vehicles.

The proposed project includes the request for a Variance to reduce the number of required parking spaces. According to §§ 8176-2(w)2 and 8176-2(w)3 of the Ventura County Coastal Zoning Ordinance (2013), the camp and campground uses combined are required to include 474 parking spaces. As described above, the facility contains a total of 48 parking spaces. Therefore, the facility has a shortage of 426 parking spaces. The applicant proposes to use existing parking spaces, buses to transport campers, and various fields and open areas of the site for parking during special events.

Water Supply:

The Yerba Buena Water Company will provide water for the proposed project.

Sewage Disposal:

Private septic systems will provide sewage disposal for the proposed use. The septic systems will include the following:

Gindling Hilltop (Upper Camp) – Traditional Septic Systems:

Gindling Hilltop will continue to be served by six onsite septic systems, shown on the site plan as Systems 13 through 18. Each system is composed of a septic tank sized between 1,200 to 4,500-gallons and associated leach fields.

Camp Hess Kramer (Lower and Middle Camp) – On-Site Wastewater Treatment System:

An advanced onsite wastewater treatment system (OWTS) will serve Middle and Lower Camps. The proposed OWTS will consist of: approximately 500 and 4,500 linear feet of 4-inch and 6-inch (respectively) polyvinyl chloride (PVC) gravity sewer lines; approximately 400 linear feet of force main; 15 manholes; an Orenco Systems, Inc. AdvanTex recirculating bed filter system (or equivalent); 21 seepage pits (i.e., dry wells); and, 34 seepage pits designated for an 100% expansion area. The OWTS will be placed underground. All above-ground equipment of the OWTS will be visually screened with landscaping so as not to be visible from off-site.

Wastewater will be transferred from Middle to Lower Camp via a 4-inch and 6-inch sewer gravity line. Four, 4-inch force mains, pumps and collection systems, will be constructed at the three vehicle bridge crossings and pedestrian bridge.

Wastewater will be discharged into the recirculating bed filter system located southeast of the Alan A. Seiner Memorial Sports Center, and will include three settlement tanks (75,000-gallons total) for primary treatment, a 25,000-gallon recirculation tank for secondary treatment, and a 25,000-gallon dosing tank. From the dosing tank, effluent will be distributed to 10 treatment pods located at the southern end of Gil Fitch Field before being discharged into the seepage pits.

The OWTS will be maintained through a multiyear contract with a licensed operator such as the Ventura Regional Sanitary District (VRSD). The actual operator has not been chosen at this time; however maintenance of the OWTS will be in accordance with all rules and regulations of the County of Ventura and State Regional Water Quality Control Board (Los Angeles RWQCB).

The sludge accumulated in the septic tanks would be minimal. The applicant will arrange to have a Ventura County licensed Septic Tank Pumper pump the primary tanks every two to five years, depending on kitchen usage, and take the sludge to a waste water treatment facility, in the same manner as would be conducted for a standard septic tank.

All existing septic tanks and sewer lines no longer being used by Middle and Lower Camps will be abandoned in place. Gindling Hilltop Camp will continue to be served by existing septic systems.

Approximately 19,800 square feet (sq.ft.) of ground surface area is proposed to be disturbed, primarily along existing camp roads. Excavation includes trenching for the gravity sewer lines [approximately 1,210 cubic yards (c.y.) of cut], trenching for the force main (about 290 c.y. of cut), and construction of the OWTS (approximately 820 c.y. of cut and 370 c.y. of fill). Due to soil shrinkage, the majority of excavated fill material will be recompacted into the trenched areas, and any excess will be spread within existing developed camp field areas.

B. STATEMENT OF ENVIRONMENTAL FINDINGS:

State law requires the Resource Management Agency, Planning Division, as the lead agency for the proposed project, to prepare an Initial Study (environmental analysis) to determine if the proposed project could significantly affect the environment. Based on the findings contained in the attached Initial Study, it has been determined that the proposed project may have a significant effect on the environment, however mitigation measures are available which would reduce the impacts to less than significant levels. Therefore, a Mitigated Negative Declaration has been prepared and the applicant has agreed to implement the mitigation measures.

C. LISTING OF POTENTIALLY SIGNIFICANT ENVIRONMENTAL IMPACTS IDENTIFIED:

Item 4 – Biological Resources

Impacts to Nesting Birds, Monarch Butterfly Winter Roost Sites, Drainages, and Sensitive Plant Communities (Coast Live Oak Woodland, California Sycamore Woodland, and Giant Coreopsis Scrub Habitats)

Item 8 – Cultural Resources

Impacts to Archaeological Resources

Item 21 – Noise and Vibration

Impacts resulting from Noise

D. PUBLIC REVIEW:

Legal Notice Method: Direct mailing to property owners within 300 feet of the property on which the proposed project is located, and a legal notice in a newspaper of general circulation.

Document Posting Period: April 25, 2013 through May 27, 2013

Public Review: The Initial Study prepared for this proposed project has determined that the project will not have a significant environmental impact. The Initial Study/Mitigated Negative Declaration is available for public review on-line at www.ventura.org/planning (select “CEQA Environmental Review”) or at the County of Ventura, Resource Management Agency, Planning Division, 800 South Victoria Avenue, Ventura, California, from 8:00 am to 5:00 pm, Monday through Friday. A draft MND was previously circulated for public review from October 9, 2012, through November 9, 2012.

Comments: The public is encouraged to submit written comments regarding this Mitigated Negative Declaration no later than 5:00 p.m. on the last day of the above posting period to Andrea Ozdy, the case planner, at the County of Ventura Resource Management Agency, Planning Division, 800 South Victoria Avenue L#1740, Ventura, CA 93009. The Planning Division’s FAX number is (805) 654-2509. You may also e-mail the case planner at andrea.ozdy@ventura.org.

E. CONSIDERATION AND APPROVAL OF THE MITIGATED NEGATIVE DECLARATION:

Prior to approving the project, the decision-making body of the Lead Agency must consider this Mitigated Negative Declaration and all comments received on the Mitigated Negative Declaration. That body may approve the Mitigated Negative Declaration if it finds that all the significant effects have been identified and that the proposed mitigation measures will reduce those effects to less than significant levels.

Prepared by:

Andrea Ozdy
Andrea Ozdy, Case Planner
Residential Permits Section
Ventura County Planning Division

Reviewed for Release to the Public by:

Daniel Klemann
Daniel Klemann, Manager
Residential Permits Section
Ventura County Planning Division

**Recommended for Approval by
Lead Agency by:**

Kim L. Prillhart, Director
Kim L. Prillhart, Director
Ventura County Planning Division



County of Ventura Planning Division

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

INITIAL STUDY FOR LU10-0069 (Camp Hess Kramer)

Section A – Project Description

1. **Project Number(s):** LU10-0069
2. **Applicant/Property Owner:** Howard G. Kaplan, Executive Director, Camp Hess Kramer
3. **Project Location (including map):** 11495 and 11677 Pacific Coast Highway (PCH), Santa Monica Mountains, (Assessor's Parcel Nos: 700-0-060-140, 700-0-060-260, 700-0-060-310, and 700-0-070-450)
4. **Project Description:** Camp Hess Kramer, Inc., the applicant, requests approval of a Conditional Use Permit (CUP) to operate a camp known as "Camp Hess Kramer," which will include a campground area, and special events not to exceed 60 events annually. The request is for a CUP life of 20 years with an option to extend the CUP for an additional 20 years with a minor modification. (See attached plans.) According to the Ventura County Coastal Zoning Ordinance (CZO) (2013) § 8172-1, the proposed uses are defined as follows:
 - **Camp:** *A rural facility with permanent structures for overnight accommodation and accessory structures and buildings, which is used for temporary leisure, recreational or study purposes, and provides opportunities for the enjoyment or appreciation of the natural environment.*
 - **Campground:** *A rural facility without permanent structures for overnight accommodation, but with limited accessory structures and buildings, which is used for temporary leisure or recreational purposes and provides opportunities for the enjoyment or appreciation of the natural environment.*

Camp Buildings:

The project area covers 187 acres, most of which was previously developed under CUP 1321. The project area contains three distinct camp areas: (1) Camp Hess Kramer (Lower Camp); (2) Camp Hess Kramer (Middle Camp); and, (3) Gindling Hilltop Camp (Upper Camp). All three camp areas are within the limits of the CRE (Coastal Rural Exclusive) zoning designation.

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Camp Hess Kramer (Lower Camp) is located within APN 700-0-060-450. The camp is composed of: an assembly building (i.e., Baruh Hall); a meeting room (i.e., Gildred Hall); an arts and crafts area and separate buildings for restrooms; an infirmary; a dining hall; an adult sleeping quarters; a conference center and adult overnight accommodations; executive and staff housing; a maintenance shop; a staff restroom building; a pool; and, recreation areas. The sizes of the buildings, structures, and areas, are as follows:

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Shed U	Storage Shed	96
Shed V	Storage Shed	42
Shed W	Storage Shed	96
Shed X	Storage Shed	49
Jacuzzi	Jacuzzi	25
TOTAL:		52,119 sq.ft.

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

Camp Hess Kramer (Middle Camp) is located within the portion of the property identified as APN 700-0-060-310. The camp includes 19 guest cabins (some with bathrooms and showers), two shower buildings, and one restroom building, as follows:

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Shed L	Storage Shed	16
Shed M	Storage Shed	32
Yerba Buena Water Tank	Yerba Buena Water Tank (47,000 gallon tank for water storage)	452

TOTAL: 18,206 sq.ft.

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

Gindling Hilltop Camp is located within the portion of the property identified as APN 700-0-060-140. The camp includes seven guest cabins with bathrooms and showers, staff housing, a dining hall, administration office, pool and recreation areas, as follows:

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Shed C	Storage Shed	400
Shed D	Storage Shed	112
Shed E	Storage Shed	120
Shed E1	Storage Shed	120

TOTAL: 25,928 sq.ft.

Overnight Accommodations:

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(Lot Size in Acres)(10.24) = the maximum number of persons to be accommodated overnight.

The CUP area includes approximately 25.42 acres of land zoned CRE-10 ac/M (Coastal Rural Exclusive, 10-acre minimum lot size/Santa Monica Mountains Overlay) and approximately 28.93 acres of land zoned CRE-20 ac/M (Coastal Rural Exclusive, 20-acre minimum lot size/Santa Monica Mountains Overlay), for a total of about 54.35 acres of CRE-zoned area. Therefore, overnight accommodations for a maximum of 557 people is allowed [(54.35 acres)(10.24) = 557 people]. The applicant proposes overnight accommodations for up to 549 people. Maximum occupancy includes campers (school children ranging in age from 3rd through 12th grade), camp counselors, adult chaperones, and camp staff. Summer camp sessions range from eight to 27 days. Guests and camp staff will sleep in either of the following areas:

- in cabins and buildings within the CRE-zoned areas of the site; or,
- at an overnight campground site located in the northeast corner of APN 700-0-060-260 (zoned COS-10 ac/M). Guests and camp staff will hike to an area where seven wooden platform structures (8-foot

x 18-feet) are used for spending the night outdoors in sleeping bags.

Employees:

Thirty-two full-time employees and six part-time employees will operate Camp Hess Kramer. Of the 32 full-time employees, 11 are full-time residents and six are summer residents during the summer camp season from June through August.

Activities and Uses:

Camp organizers offer a multitude of activities including, but not limited to, archery, basketball, climbing, ropes, soccer, tennis, swimming, hiking, arts and crafts, dancing and singing, and worship.

The camp is private and no daily public use is offered. However, Camp Hess Kramer is available by reservation and lease for group camping from September through May, when the summer camp is not in session.

Pursuant to the CZO (§ 8175-5.4.3.2), the total population allowed on land that is zoned CRE is based on the following formula:

$$(\text{Lot Size in Acres})(20.48) = \text{total population allowed on site.}$$

As discussed in this project description above (under “Overnight Accommodations”) the CUP area includes approximately 25.42 acres of land zoned CRE-10 ac/M and approximately 28.93 acres of land zoned CRE-20 ac/M, for a total of about 54.35 acres of CRE-zoned area. Therefore, a maximum daily population of 1,113 people is allowed [(54.35 acres)(20.48) = 1,113 people]. The applicant proposes a maximum daily population of 549 persons.

Special Events:

Use of the camp will include outdoor special events [e.g., B’nai Mitzvahs (and the parties) and weddings]. Outdoor event hours of operation will be limited to the months of September through May, Monday through Sunday from 10:00 a.m. to 12:30 a.m. for a maximum of 60 days within the calendar year. Outdoor events are required to end by 12:30 a.m. with lights out and all guests and vendors off the property by 1:00 a.m. While outdoor events will be subject to these time restrictions, some guests will remain on the property after 1:00 a.m. in various overnight accommodations. The proposed outdoor special events will be limited to 549 persons total and shall be limited to areas north of the graded Gil Fitch field at the south end of the camp. Event coordinators will be responsible for making sure guests remain in designated areas. Camp Hess Kramer will provide all rentals (e.g., tables, chairs, linens, china, and silverware), food, and beverages for the outdoor special events. No

loudspeakers or sound amplification systems or devices will be used in the Gil Fitch field at any time.

For the proposed special events, athletic fields and courts and open space areas adjacent to developed portions of the property will provide parking to accommodate special events.

Parking and Access:

There are 46 standard parking spaces and two designated handicap parking spaces located within APN 700-0-070-450. Cabins include rear access doors accessible by car to drop off individuals with disabilities. Informal loading spaces are located adjacent to dining halls at Gindling Hilltop (Upper Camp) and Camp Hess Kramer (Lower Camp).

Access to the site is via PCH to Yerba Buena Road to the camp entrance. A paved private road with an average width of 14 feet (20-foot maximum in some areas) provides access to the developed areas (i.e., the Upper, Middle, and Lower camps).

During the summer camp calendar (June through August), guests meet at Wilshire Boulevard Temple Camps Headquarter offices located at 3663 Wilshire Blvd. in Los Angeles. Guests are then brought by bus to Camp Hess Kramer. Upon arrival, guests disembark from the buses and hike to their respective camps. Staff loads vans to deliver luggage to the camp areas and returns luggage to Camp Hess Kramer ("Lower Camp") at the close of the camp session. During the off-season (September through May), groups are bused in or arrive in personal vehicles.

The proposed project includes the request for a Variance to reduce the number of required parking spaces. According to §§ 8176-2(w)2 and 8176-2(w)3 of the Ventura County Coastal Zoning Ordinance (2013), the camp and campground uses combined are required to include 474 parking spaces. As described above, the facility contains a total of 48 parking spaces. Therefore, the facility has a shortage of 426 parking spaces. The applicant proposes to use existing parking spaces, buses to transport campers, and various fields and open areas of the site for parking during special events.

Water Supply:

The Yerba Buena Water Company will provide water for the proposed project.

Sewage Disposal:

Private septic systems will provide sewage disposal for the proposed use. The septic systems will include the following:

Gindling Hilltop (Upper Camp) – Traditional Septic Systems:

Gindling Hilltop will continue to be served by six onsite septic systems, shown on the site plan as Systems 13 through 18. Each system is composed of a septic tank sized between 1,200 to 4,500-gallons and associated leach fields.

Camp Hess Kramer (Lower and Middle Camp) – On-Site Wastewater Treatment System:

An advanced onsite wastewater treatment system (OWTS) will serve Middle and Lower Camps. The proposed OWTS will consist of: approximately 500 and 4,500 linear feet of 4-inch and 6-inch (respectively) polyvinyl chloride (PVC) gravity sewer lines; approximately 400 linear feet of force main; 15 manholes; an Orenco Systems, Inc. AdvanTex recirculating bed filter system (or equivalent); 21 seepage pits (i.e., dry wells); and, 34 seepage pits designated for an 100% expansion area. The OWTS will be placed underground. All above-ground equipment of the OWTS will be visually screened with landscaping so as not to be visible from off-site.

Wastewater will be transferred from Middle to Lower Camp via a 4-inch and 6-inch sewer gravity line. Four, 4-inch force mains, pumps and collection systems, will be constructed at the three vehicle bridge crossings and pedestrian bridge.

Wastewater will be discharged into the recirculating bed filter system located southeast of the Alan A. Seiner Memorial Sports Center, and will include three settlement tanks (75,000-gallons total) for primary treatment, a 25,000-gallon recirculation tank for secondary treatment, and a 25,000-gallon dosing tank. From the dosing tank, effluent will be distributed to 10 treatment pods located at the southern end of Gil Fitch Field before being discharged into the seepage pits.

The OWTS will be maintained through a multiyear contract with a licensed operator such as the Ventura Regional Sanitary District (VRSD). The actual operator has not been chosen at this time; however maintenance of the OWTS will be in accordance with all rules and regulations of the County of Ventura and State Regional Water Quality Control Board (Los Angeles RWQCB).

The sludge accumulated in the septic tanks would be minimal. The applicant will arrange to have a Ventura County licensed Septic Tank Pumper pump the primary tanks every two to five years, depending on kitchen usage, and take the sludge to a waste water treatment facility, in the same manner as would be conducted for a standard septic tank.

All existing septic tanks and sewer lines no longer being used by Middle and Lower Camps will be abandoned in place. Gindling Hilltop Camp will continue to be served by existing septic systems.

Approximately 19,800 square feet (sq.ft.) of ground surface area is proposed to be disturbed, primarily along existing camp roads. Excavation includes trenching for the gravity sewer lines [approximately 1,210 cubic yards (c.y.) of cut], trenching for the force main (about 290 c.y. of cut), and construction of the OWTS (approximately 820 c.y. of cut and 370 c.y. of fill). Due to soil shrinkage, the majority of excavated fill material will be recompacted into the trenched areas, and any excess will be spread within existing developed camp field areas.

5. General Plan Designation and Zoning of the Project Site:

General Plan Designation: "Rural" and "Open Space"

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

6. Description of the Physical Alterations/Improvements Caused by the Project (including site plan, elevations, off-site improvements, etc.):

As discussed above, the proposed project includes the construction of an advanced OWTS to replace the existing individual septic systems currently providing wastewater treatment for the Lower and Middle Hess Kramer Camp areas (Gindling Hilltop Camp will continue to be serviced by individual septic systems), and the legalization of various existing non-habitable structures.

7. Description of the Public Facilities (e.g., roads, water supply, sewers, utilities) that must be Extended or Expanded to Serve the Project:

No public facilities will be extended or expanded to serve the project area. The proposed OWTS will provide wastewater treatment only to the project site.

8. List of Responsible and Trustee Agencies:

Los Angeles Regional Water Quality Control Board
California Department of Fish and Wildlife
California Coastal Commission

Section B Initial Study Checklist and Discussion of Responses

PROJECT NO. LU10-0069

Issue (Responsible Department)	Project Impact Degree Of Effect*				Cumulative Impact Degree Of Effect*			
	N	LS	PS-M	PS	N	LS	PS-M	PS

RESOURCES:

1. Air Quality (APCD)		X				X		
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Based on information provided by the applicant and the URBEMIS 2007 computer model, air quality impacts will be below the 25 pounds per day threshold for reactive organic compounds and oxides of nitrogen as described in the Ventura County Air Quality Assessment Guidelines (3.20 lbs/day and 3.56 lbs/day, respectively). Although the project is not expected to result in any significant local air quality impacts, the Ventura County Air Pollution Control District (VCAPCD) recommended conditions of approval for the project to minimize fugitive dust and particulate matter that may result from activities on the site. The conditions will require the applicant to conduct all project construction and site preparation operations in compliance with all applicable VCAPCD Rules and Regulations with emphasis on Rule 10 (Permits Required), Rule 50 (Opacity), Rule 51 (Nuisance), and Rule 55 (Fugitive Dust). Therefore, based on information in the project application, the project will result in less than significant project-specific and cumulative impacts on local or regional air quality.

Source Documents: Ventura County Initial Study Assessment Guidelines of July 2010; Ventura County Air Quality Assessment Guidelines (October 2003); and, Memo from Alicia Stratton to Debbie Morrisset (dated June 29, 2010).

2. Water Resources (PWA):								
a. Groundwater Quantity		X				X		

The project will continue to be served by the Yerba Buena Water Company. There is no anticipated change in annual demand volume as a result of the reauthorization of the camp use and the installation of a new OWTS. Additionally, the project will not create a cumulative impact on the underlying Groundwater Basin, as the proposed project will not change the demand for groundwater supplies. Therefore, adverse project-specific and cumulative impacts related to groundwater quantity will be less than significant.

Source Documents: Ventura County Initial Study Assessment Guidelines of July 2010 and Memos from Rick Viergutz to Debbie Morrisset (dated December 13, 2010) and Memo from Rick Viergutz to Andrea Ozdy, (dated January 27, 2011)

b. Groundwater Quality		X				X		
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Groundwater quality concerns associated with aging septic systems have been addressed by a planned, complete redesign and replacement of the 11 septic systems that serve the Middle and Lower Camp areas.

Issue (Responsible Department)	Project Impact Degree Of Effect*				Cumulative Impact Degree Of Effect*			
	N	LS	PS-M	PS	N	LS	PS-M	PS

Six deep seepage pit effluent disposal systems will remain to serve the Upper Camp area buildings since these systems have adequate setback distances from historical high groundwater and surface streams. These Upper Camp area septic systems are fully permitted with the Ventura County Resource Management Agency, Environmental Health Division, and are all in good working order.

The proposed Orenco Systems, Inc. AdvanTex wastewater treatment system will contain a recirculating packed-bed filter product (or approved equivalent). Effluent will be treated in accordance with Ventura Regional Sanitation District and Regional Water Quality Control Board requirements and Ventura County Environmental Health Division's standards. The engineering consultant (Penfield & Smith, Drainage report dated December 13, 2010) indicated that the proposed system will removal Total Nitrogen (N) to less than 10 mg/l (State standard), and will result in a 2 log scale reduction in bacteria. Reduction of Biochemical Oxygen Demand (BOD) will be less than 20 mg/l, and Total Suspended Solids (TSS) will also be less than 20 mg/l (written and oral communication with P&S Project Engineer Peter Nostrand). All chemical component values will be below the maximum allowable passing levels in order to meet Environmental Protection Agency (EPA) standards for secondary wastewater treatment.

Packed bed trickling filters (AX100 pods) will provide the final stage of secondary treatment following the Settling Tank (75,000 gallons of primary treatment), the Recirculation Tank (secondary treatment), and the series of Dosing Tanks (25,000 gallons each).

Both a primary deep seepage pit system, and a new 100 percent expansion area for additional seepage pits (if needed) will be designed in conjunction with the rest of the wastewater system for final disposal of up to 30,000 gallons per day of pre-treated liquid effluent into fractured Topanga Formation sandstone beds underlying the camp.

With the use of the proposed OWTS described above, project-specific and cumulative adverse impacts related to groundwater quality will be less than significant.

Source Documents: Ventura County Initial Study Assessment Guidelines of July 2010, Memo from Rick Viergutz to Debbie Morrisset (dated December 13, 2010), Memo from Rick Viergutz to Andrea Ozdy (dated January 27, 2011), Drainage Report prepared by Penfield & Smith (dated December 13, 2010), Memo from Peter Nostrand of Penfield & Smith (dated August 24, 2012), and E-mail from Rick Viergutz to Andrea Ozdy (dated August 27, 2012)

Issue (Responsible Department)	Project Impact Degree Of Effect*				Cumulative Impact Degree Of Effect*			
	N	LS	PS-M	PS	N	LS	PS-M	PS
c. Surface Water Quantity	X				X			

The proposed project does not rely on surface water supplies for water supply needs, and there are no anticipated cumulative effects on surface water quantity. Therefore, there will be no adverse impacts related to surface water quantity.

Source Documents: Ventura County Initial Study Assessment Guidelines of July 2010 and Memos from Rick Viergutz to Debbie Morrisset (dated December 14, 2010) Memo from Rick Viergutz to Andrea Ozdy (dated January 27, 2011), and Memo from Rick Viergutz to Andrea Ozdy (dated April 30, 2012).

d. Surface Water Quality		X				X		
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The proposed project is not expected to result in a violation of any surface water quality standards as defined in the Los Angeles Basin Plan. In accordance with the Ventura Countywide Municipal Stormwater National Pollutant Discharge Elimination System (NPDES) Permit CAS004002, "Development Construction Program" Subpart 4.F, the applicant will be required to include Best Management Practices (BMPs) designed to ensure compliance and implementation of an effective combination of erosion and sediment control measures to protect surface water quality during construction. The project involves ground disturbance activities of approximately 19,800 square feet and, therefore, the applicant will be required to implement construction BMPs for projects that disturb less than once acre of land. As such, neither the individual project nor the cumulative threshold for significance would be exceeded, and the project is expected to have a less than significant project-specific and cumulative impact on surface water quality.

Source Documents: Ventura County Initial Study Assessment Guidelines of July 2010 and Memo from Ewelina Mutkowska to Andrea Ozdy (dated January 28, 2011), E-mail from Yugal Lall to Andrea Ozdy (dated December 13, 2011), and Memo from Ewelina Mutkowska to Andrea Ozdy (dated May 15, 2012)

3. Mineral Resources (PInG):								
a. Aggregate	X				X			

The subject property is not located on or adjacent to land classified as MRZ-2 or land that is subject to an aggregate extraction CUP. Additionally the subject property and neighboring properties are not within the "MRP" (Mineral Resource Protection) overlay zone. Therefore, no project-specific or cumulative adverse impacts related to extraction of aggregate resources would occur.

Source Document: Ventura County Initial Study Assessment Guidelines of July 2010

b. Petroleum	X				X			
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Pursuant to General Plan Resources Appendix Figure 1.4.7 (Petroleum Resources Map), the project is not located in petroleum resource area. Additionally, the project site is not located adjacent to a principal access road to an area that is subject to an

Issue (Responsible Department)	Project Impact Degree Of Effect*				Cumulative Impact Degree Of Effect*			
	N	LS	PS-M	PS	N	LS	PS-M	PS

existing petroleum CUP, and does not have the potential to hamper or preclude access to petroleum resources. Therefore, the project will have no project-specific or cumulative adverse impacts to petroleum resources.

Source Documents: Ventura County Initial Study Assessment Guidelines of July 2010, Ventura County General Plan Resources Appendix (Petroleum Resources Map – Figure 1.4.7), and Ventura County General Plan Resources Appendix (Petroleum Resources – Section 1.4.2).

4. Biological Resources			X				X	
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The proposed project involves the installation of the OWTS (including pipes throughout the camp) and the legalization of several existing structures within the developed portions of the site. The following responses to the Initial Study Checklist were prepared based on information provided in the Initial Study Biological Assessment (ISBA) prepared by Rincon Consultants, Inc. (dated September 29, 2011), as well as County biological resources maps.

Species

Plants

Southern California black walnut, a California Rare Plant Rank (RPR) 4 species, is the only special status plant species that was observed on the site during a site survey conducted in March 2011. This native walnut species occurs throughout Little Sycamore Canyon Creek on the property. The proposed pipeline for the OWTS will cross the creek at various locations throughout the property, but the creek crossings have been designed to avoid the banks and bed of the creek and, therefore, the southern California black walnut will be avoided as well.

The following special status plant species have a moderate potential to occur onsite: Catalina mariposa lily (RPR 4); Plummer’s mariposa lily (RPR 1B and Ventura County Locally Important Plant); and, Ojai navarretia (RPR 1B). Although the field survey was conducted outside of the blooming period for these species and their presence/absence on the property could not be confirmed, the OWTS, including the pipelines, are proposed to be located in areas that do not contain native vegetation or suitable habitats for these species.

Because installation of the proposed OWTS would avoid suitable habitat for special status plants, no impacts on special status plants are expected.

Animals

No special status animals were observed on the project site during a biological survey conducted in March 2011. However, the following special status animals have a moderate potential to occur onsite based on presence of suitable habitat: Cooper’s hawk (Rank S3, meaning vulnerable to extirpation in the State); coastal whiptail

Issue (Responsible Department)	Project Impact Degree Of Effect*				Cumulative Impact Degree Of Effect*			
	N	LS	PS-M	PS	N	LS	PS-M	PS

(Rank S3); and, two-striped garter snake (a California Species of Special Concern). In addition, one monarch butterfly (Rank S3) has been reported in the California Natural Diversity Database (CNDDDB) as occurring along Little Sycamore Canyon Creek on the property. The CNDDDB has tracked data from this winter roosting site since 1986 and reports that up to 10,000 monarchs have been observed roosting along Little Sycamore Canyon Creek. Direct impacts on these species are not expected to occur, because the proposed OWTS has been designed to completely avoid the removal of suitable habitat for these species. However, noise, vibration, and dust during construction of the OWTS could negatively affect nesting Cooper's hawk or other migratory birds and roosting monarch butterflies within the woodland habitats along Little Sycamore Canyon Creek. Therefore, potential indirect impacts on nesting migratory birds and monarch butterflies are considered potentially significant but mitigable. Mitigation measures 1 and 2 (below) will reduce potential impacts on special status animals to less than significant levels.

Ecological Communities

Sensitive Plant Communities

The plant communities on the site are: coast live oak woodland, a locally important community; California sycamore woodland, a sensitive plant community with a rank of G3S3 (vulnerable to extirpation/extinction globally and in the State); giant coreopsis scrub, a sensitive plant community with a rank of G3S3; California sagebrush – black sage scrub; annual brome grassland; and, ornamental – native mix. The OWTS has been designed to avoid removal of the plant communities listed as sensitive by locating the facilities and pipelines within existing trails and roads. However, because trenching would occur close to these sensitive plant communities, there is a potential for significant indirect impacts on sensitive plant communities. Implementation of Mitigation Measure 3 (below) will ensure that construction activities avoid impacts on sensitive plant communities.

Waters and Wetlands

Little Sycamore Canyon Creek and three tributaries to the creek occur within the project boundaries. The creek supports mature riparian woodland and special status species and, therefore, it is considered significant wetland habitat. The proposed OWTS has been designed to entirely avoid the bed and banks of the creek and tributaries by spanning the pipes across the creek and tributaries on the existing bridges. Therefore, no direct impacts on waters and wetlands are expected. Potential indirect impacts to waters and wetlands from construction activities occurring adjacent to the creek and tributaries would be potentially significant. However, with implementation of Mitigation Measure 3 potentially significant impacts would be reduced to less than significant levels.

Environmentally Sensitive Habitat Areas

All of the native plant communities on the property, including coast live oak

Issue (Responsible Department)	Project Impact Degree Of Effect*				Cumulative Impact Degree Of Effect*			
	N	LS	PS-M	PS	N	LS	PS-M	PS

woodland, California sycamore woodland, giant coreopsis scrub, and California sagebrush – black sage scrub, are considered to be environmentally sensitive habitat areas (ESHA) in the Coastal Zone. The annual brome grassland and native-ornamental mix are not considered to be ESHA. The proposed OWTS has been designed to avoid removal of ESHA by locating the facilities and pipelines within existing trails and roads. However, because trenching would occur close to ESHA, there is a potential for significant indirect impacts on ESHA. Implementation of Mitigation Measure 3 below would ensure that construction activities avoid impacts on ESHA. Additionally, the fuel modification areas associated with existing structures to be legalized are located within areas that previously have been cleared as part of previously permitted development within the project site.

Habitat Connectivity

The property is not located within a regional linkage for wildlife migration. Little Sycamore Canyon Creek flows through the property and may provide some local connectivity for wildlife. The property is currently developed with structures associated with the existing camp operations. The project involves the continuation of camp operations and the installation of an OWTS that will be mostly buried underground. Therefore, no new barriers to wildlife movement are proposed and no changes to camp operations are proposed that would have an impact on habitat connectivity.

Mitigation Measures

The project-specific impact, as well as the project’s contribution to cumulative impacts, to biological resources will be reduced to a less-than-significant level with the implementation of the following mitigation measures:

Mitigation Measure 1: Avoidance of Nesting Birds

Purpose: In order to prevent impacts on birds protected under the Migratory Bird Treaty Act, construction activities shall be regulated.

Requirement: The Permittee shall conduct all construction activities related to installing the OWTS in such a way as to avoid nesting native birds. This can be accomplished by implementing either one of the following options:

1. Timing of construction: Prohibit construction activities during the breeding and nesting season (February 1 – August 31), in which case the following surveys are not required; or,
2. Surveys and avoidance of occupied nests: Conduct site-specific surveys prior to construction activities during the breeding and nesting season (February 1 – August 31) and avoid occupied bird nests. Surveys shall be conducted to identify any occupied (active) bird nests in the area proposed for disturbance. Occupied nests shall be avoided until juvenile birds have vacated the nest. All surveys shall be conducted by a County-approved biologist with a California

Issue (Responsible Department)	Project Impact Degree Of Effect*				Cumulative Impact Degree Of Effect*			
	N	LS	PS-M	PS	N	LS	PS-M	PS

Department of Fish and Wildlife (CDFW) Scientific Collecting Permit.

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

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

Timing: If construction activities will occur between February 1 and August 31, nesting bird surveys shall be conducted 30 days prior to initiation of construction activities, and weekly thereafter, and the last survey for nesting birds shall be conducted no more than 3 days prior to initiation of construction activities. The Survey Report documenting the results of the first nesting bird survey and the signed contract shall be provided to the Planning Division prior to issuance of a Zoning Clearance for construction. The Mitigation Monitoring Report shall be submitted within 14 days of completion of the construction activities.

Monitoring and Reporting: The Planning Division shall review the Survey Report and signed contract for adequacy prior to issuance of a Zoning Clearance for construction. The Planning Division shall maintain copies of the signed contract, Survey Report, and Mitigation Monitoring Report in the project file.

Issue (Responsible Department)	Project Impact Degree Of Effect*				Cumulative Impact Degree Of Effect*			
	N	LS	PS-M	PS	N	LS	PS-M	PS

Mitigation Measure 2: Avoidance of Monarch Butterfly Winter Roost Sites

Purpose: To minimize indirect project impacts to monarch butterfly roosts.

Requirement: The Permittee shall avoid monarch butterfly roosts during all construction activities related to installing the OWTS. This can be accomplished by implementing either one of the following options:

1. Timing of construction: Prohibit construction activities during the monarch wintering season (October 1 through March 1); or,
2. Surveys and avoidance: Conduct site-specific surveys prior to construction activities during the monarch wintering season (October 1 through March 1) and avoid monarch roosts.

Surveys shall be conducted to identify any monarch roosts in the area proposed for disturbance. Monarch roosts shall be avoided during the wintering season by establishing a 100-foot buffer between construction activity and the roost. All surveys shall be conducted by a County-approved biologist with a CDFW Scientific Collecting Permit.

An initial monarch survey shall be conducted 30 days prior to the initiation of construction activities. The project site must continue to be surveyed on a weekly basis with the last survey completed no more than 7 days prior to the initiation of construction activities. The monarch butterfly survey must cover monarch wintering habitat within the footprint of the OWTS, including pipelines, and 100 feet from the footprint including all construction areas. If monarch roosts are found, construction activities within 100 feet surrounding the roost shall be postponed or halted while the monarchs are present (typically October 1 through March 1). Construction activities can occur outside of the 100-foot setback areas.

Documentation: The Permittee shall provide to the Planning Division a Survey Report from a County-approved biologist documenting the results of the initial monarch survey and a plan for continued surveys and avoidance of roosts in accordance with the requirements above. Along with the Survey Report, the Permittee shall provide a copy of a signed contract (financial information redacted) with a County-approved biologist responsible for the surveys and monitoring of any monarch roosts that are discovered. The Permittee shall submit to the Planning Division a Mitigation Monitoring Report from a County-approved biologist following construction activities that documents the results of subsequent surveys and actions taken to avoid monarch roosts.

Timing: If construction activities will occur between October 1 and March 1, monarch surveys shall be conducted 30 days prior to initiation of construction activities, and weekly thereafter, and the last survey for monarchs shall be conducted no more than 7 days prior to initiation of construction activities. The Survey Report documenting the results of the first monarch survey and the signed contract shall be provided to the Planning Division prior to issuance of a Zoning Clearance for

Issue (Responsible Department)	Project Impact Degree Of Effect*				Cumulative Impact Degree Of Effect*			
	N	LS	PS-M	PS	N	LS	PS-M	PS

construction. The Mitigation Monitoring Report shall be submitted within 14 days of completion of the construction activities.

Monitoring and Reporting: The Planning Division shall review for adequacy the Survey Report and signed contract prior to issuance of a Zoning Clearance for construction. The Planning Division maintains copies of the signed contract, Survey Report, and Mitigation Monitoring Report in the project file.

Mitigation Measure 3: Construction Monitoring by a County-approved Biologist

Purpose: To avoid indirect impacts on sensitive plant communities, wetland habitat and ESHA during installation of the OWTS.

Requirement: The Permittee shall retain the services of a County-approved qualified biologist to monitor activities associated with installation of the OWTS when work occurs within 30 feet of stream banks, coast live oak woodland, California sycamore woodland, and/or giant coreopsis scrub habitats. The biological monitor will be responsible for ensuring that construction activities avoid these sensitive plant communities.

Documentation: The Permittee shall provide a copy of a signed contract (financial information redacted) with a County-approved biologist responsible for monitoring. The locations of the sensitive habitats that will be monitored and the schedule for the monitoring must be clearly stipulated in the contract. The Permittee shall submit to the Planning Division a Mitigation Monitoring Report from a County-approved biologist following completion of construction activities that documents actions taken to ensure that all activities avoid the sensitive habitats listed above.

Timing: The signed contract shall be provided to the Planning Division prior to issuance of a Zoning Clearance for construction. The Mitigation Monitoring Report shall be submitted within 14 days of completion of installation of the OWTS.

Monitoring and Reporting: The Planning Division shall review for adequacy the signed contract prior to issuance of a Zoning Clearance for construction. The Planning Division maintains copies of the signed contract and Mitigation Monitoring Report in the project file.

5. Agricultural Resources:								
a. Soils (Plng.)	X				X			

The Important Farmland Inventory soils classification for all of the soils underlying the proposed project site is "Other." Soils classified as "Other" are not subject to resource protection and environmental impact analysis, pursuant to the Initial Study Assessment Guidelines. Additionally, no new impervious area will be created as a result of the proposed project. Therefore, the project will not result in project-specific or cumulative impacts related to agricultural soils.

Issue (Responsible Department)	Project Impact Degree Of Effect*				Cumulative Impact Degree Of Effect*			
	N	LS	PS-M	PS	N	LS	PS-M	PS

Source Documents: *Ventura County Initial Study Assessment Guidelines of July 2010, and Planning GIS Important Farmland Inventory Layer (accessed January 31, 2011)*

b. Land Use Incompatibility (Ag. Dept.)		X						
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The evaluation of land use incompatibility pertains to the introduction of incompatible effects from new non-agricultural projects that may affect off-site agricultural properties in the vicinity, particularly within 300 feet of any Important Farmlands. There are no agricultural properties in the vicinity of the project area, and therefore there will be no adverse project-specific impacts related to land use compatibility. Projects that are consistent with the General Plan and do not have project-specific effects will result in a determination of less-than-significant environmental effects. Therefore, cumulative impacts related to land use incompatibility will be less than significant.

Source Documents: *Ventura County Initial Study Assessment Guidelines of July 2010, Memo from Rita Graham to Debbie Morrisset (dated June 24, 2010), and e-mail from Rudy Martel to Andrea Ozdy (dated December 23, 2011).*

6. Scenic Resources (Plng)		X				X		
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Portions of the project site will be visible from a public viewing location along Pacific Coast Highway and Yerba Buena Road. However, development associated with the proposed project that is visible from Pacific Coast Highway and Yerba Buena Road already exists, was previously approved, and is not proposed for alteration. The request to approve the camp use is a result of the expiration of the original Conditional Use Permit (CUP 1321). New construction proposed at the site consists of the installation of a new OWTS, of which the majority will be subterranean and the remaining above-ground equipment will be screened from public view. Additionally, the various structures proposed to be legalized as part of the reauthorization of the now-expired camp use are not visible from public viewing locations. The proposed project will not result in the physical alteration of a scenic resource or obstruction of a scenic vista. Additionally, the project site is not located within the "SRP" (Scenic Resource Protection) overlay zone. Therefore, project-specific and cumulative adverse impacts to scenic resources will be less than significant.

Source Document: *Ventura County Initial Study Assessment Guidelines of July 2010.*

7. Paleontological Resources		X				X		
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According to the *On-Site Wastewater Treatment System (OWTS) Design Report* prepared by Earth Systems Southern California (dated October 25, 2010, page 2), construction activities would occur in area that "is underlain by a combination of fractured Tertiary rocks, including sedimentary rocks of the Topanga Formation that dip southward at about 65 degrees, and intrusive igneous rocks of the Conejo

Issue (Responsible Department)	Project Impact Degree Of Effect*				Cumulative Impact Degree Of Effect*			
	N	LS	PS-M	PS	N	LS	PS-M	PS

Volcanics.” According to the Initial Study Assessment Guidelines, the Topanga formation is assigned a paleontological importance ranking of “Moderate” and the Conejo Volcanics formation is assigned a ranking of “None.” According to staff from the Ventura County Public Works Agency – Engineering Services Department, the Quaternary deposits (alluvium) on and within the subject site are ranked “Low” paleontological importance. Therefore, project-specific impacts, and the project’s contribution to cumulative impacts, to paleontological resources will be less than significant.

However, in the unlikely event that paleontological resources are uncovered during ground disturbance or construction activities, a standard condition will be imposed requiring that construction be suspended until the find can be evaluated and recovered. This condition would cause a temporary cessation of all ground disturbance activities, notification of the Planning Director, and assessment of the find by a paleontological consultant or professional geologist. The Planning Director would review the recommendations of the consultant and decide on the disposition of the resources encountered.

Source Documents: *Ventura County Initial Study Assessment Guidelines of July 2010, On-Site Wastewater Treatment System (OWTS) Design Report prepared by Earth Systems Southern California (dated October 25, 2010), Ventura County General Plan Section 1.8 – Paleontological and Cultural Resources, and E-mail from Jim O’Tousa to Andrea Ozdy (dated November 11, 2011)*

8. Cultural Resources:								
a. Archaeological			X				X	

The project area contains Little Sycamore Creek, which is known to contain archaeological resources. According to the analysis provided by Applied Earthworks, Inc., “...many such site clusters located near streams all along the South-central Coast... were damaged or lost entirely as a result of highway improvements, urban growth, recreational developments, and infrastructural projects.” Due to the lack of documentation of resources prior to damage and destruction, archaeologists cannot determine with certainty the cumulative loss of archaeological resources; however, they agree that the majority of significant archaeological sites in the Little Sycamore Canyon area is damaged or gone, and “Any further attrition of prehistoric sites at [Camp Hess Kramer], therefore, would add to the growing tally of cumulative impacts on the archaeological record of the South-central Coast.”

The report further states that “no archaeological sites have been documented in Middle Camp;” however, the “...terrain, where most of the Middle Camp improvements are situated, is archaeologically rated as being of moderate sensitivity. The trenching for sewer lines...and the force main...could physically disturb or destroy the depositional integrity, and thus diminish the data potentials, of any intact anthrosols that might be encountered during construction. Such trenching also has

Issue (Responsible Department)	Project Impact Degree Of Effect*				Cumulative Impact Degree Of Effect*			
	N	LS	PS-M	PS	N	LS	PS-M	PS

the potential to disturb and damage human remains, if any are buried in this part of the canyon.”

Lower Camp contains additional potential for impacts beyond that stated for Middle Camp, above. According to the Phase I study, the proposed project will occur in an area that will potentially affect archaeological sites CA-VEN-1, CA-VEN-85, and CA-VEN-127.

Therefore, the proposed project will have a potentially significant, but mitigable, project-specific impact on archaeological resources.

Other recently approved, pending, and reasonably foreseeable projects that involve ground disturbance activities have the potential to result in the cumulative loss of information regarding archaeological resources. The proposed project has the potential to contribute to this cumulative loss of information, due the project’s potential to adversely affect subsurface resources that might exist within the project site. Therefore, the proposed project will result in a potentially significant, but mitigable contribution to cumulative impacts to archaeological resources.

The project-specific impact, as well as the project’s contribution to cumulative impacts, to archaeological resources will be reduced to a less-than-significant level with the implementation of the following mitigation measure:

Mitigation Measure 4: Construction Monitoring Plan (CMP) for Archaeological Resources

Purpose: The purpose of this mitigation measure is to ensure the protection of archaeological resources that exist within and in proximity to the project site.

Requirement: Prior to the issuance of a Zoning Clearance for construction, a qualified Registered Professional Archaeologist (RPA) shall be retained to prepare a CMP, to the satisfaction of the Planning Director, for the OWTS that describes how the recommendations of the Phase I study will be implemented during construction and installation of the OWTS. The CMP shall include a discussion of the following:

- Procedures for archaeological and Native American monitoring of all earth-moving activities related to project construction, including but not limited to activities that occur within CA-VEN-127 and CA-VEN-85;
- Discussion of conditions that would necessitate a Phase 2 (testing-and-evaluation) archaeological investigation;
- Methods that will be used to identify any archaeological deposits that might be found during project excavations and to determine whether such deposits are intact or disturbed;
- A plan of action for treating unanticipated discoveries of intact archaeological deposits during construction, including specifications of sampling procedures to be used, the data-recovery methods to be employed, and the anticipated

Issue (Responsible Department)	Project Impact Degree Of Effect*				Cumulative Impact Degree Of Effect*			
	N	LS	PS-M	PS	N	LS	PS-M	PS

- approach to post-field data and analysis, reporting, and curation of archaeological collections;
- Identification by the Native American Heritage Commission of the Most Likely Descendent for the Project area;
 - A checklist of the sequential steps to be taken in the event that human remains are encountered, in order to comply with applicable sections of the California Public Resources Code and Health and Safety Code;
 - Criteria by which decisions will be made to suspend construction work temporarily at find locations and to promptly recover archaeological data that otherwise would be lost;
 - Protocols for communications among the owner, construction supervisor, archaeologist, and Native American monitor to ensure that decisions are made timely in the field with respect to temporary relocation of OWTS excavation work, as warranted;
 - Protocols for discussions between the owner and the designated Most Likely Descendent regarding the disposition of any Native American human remains that might be found; and,
 - A safety plan for archaeological and Native American monitoring and data-recovery work in the context of the OWTS construction project.

Documentation: The Permittee shall submit the CMP for review and approval by the Planning Director.

Timing: The Permittee shall submit the CMP to the Planning Division for review and approval, prior to the issuance of a Zoning Clearance for construction, and prior to conducting any vegetation removal, ground disturbance activities, or construction activities (whichever occurs first).

Monitoring and Reporting: The Planning Division maintains the CMP provided by the Permittee in the project file. The Planning Division has the authority to inspect the site to confirm that the construction and installation of the OWTS is in compliance with the CMP for all ground disturbance and construction activities of the project.

Source Documents: Ventura County Initial Study Assessment Guidelines of July 2010, Ventura County General Plan Resources Appendix (Paleontological and Cultural Resources – Section 1.8), and Phase I Archaeological Survey Report prepared by Applied Earthworks, Inc. (dated August 1, 2011).

b. Historical (Plng.)	X				X			
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The project site is developed as a camp, and has been in operation since 1961. The site is not known to contain any historic resources. Furthermore, no demolition or alteration of existing buildings is proposed in order to facilitate the existing use of the site and install the proposed OWTS. Therefore, no adverse project-specific or cumulative impacts to historical resources are anticipated.

Issue (Responsible Department)	Project Impact Degree Of Effect*				Cumulative Impact Degree Of Effect*			
	N	LS	PS-M	PS	N	LS	PS-M	PS

Source Documents: *Ventura County Initial Study Assessment Guidelines of July 2010 and Ventura County General Plan Resources Appendix (Paleontological and Cultural Resources – Section 1.8).*

9. Coastal Beaches & Sand Dunes	X				X			
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The proposed project is located within the Coastal Zone of the County's *Local Coastal Program*. However, it is located entirely on the landward side of Pacific Coast Highway (PCH) and does not include any development or construction that would impact coastal beaches or sand dunes. Therefore, this project will have no adverse impacts on coastal beaches and sand dunes.

Source Documents: *Ventura County Initial Study Assessment Guidelines of July 2010 and Ventura County Local Coastal Plan*

HAZARDS:

10. Fault Rupture (PWA)	X				X			
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There are no known active or potentially active faults extending through the proposed lot based on State of California Earthquake Fault Zones in accordance with the Alquist-Priolo Earthquake Fault Zoning Act, and Ventura County General Plan Hazards Appendix (Figure 2.2.3b). Therefore, the proposed project will not result in adverse impacts with respect to potential fault rupture hazards. Additionally, seismic and geologic hazards are project and location specific and, therefore, would not result in cumulative impacts associated with seismic and geologic hazards.

Source Documents: *Ventura County Initial Study Assessment Guidelines of July 2010, Ventura County General Plan Hazards Appendix (Figure 2.2.3b), Memo from Jim O'Tousa to Andrea Ozdy (dated February 2, 2011) and E-mail from Jim O'Tousa to Andrea Ozdy (dated April 24, 2012).*

11. Ground Shaking (PWA)		X			X			
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The property is subject to moderate to strong ground shaking from seismic events on local and regional fault systems. The County of Ventura Building Code adopted from the California Building Code, dated 2007, Chapter 16, Division IV requires the structures to be designed to withstand this ground shaking. Imposition of the requirements of the Building Code will ensure that the effects of ground shaking will be less than significant. Additionally, seismic and geologic hazards are project and location specific and, therefore, would not result in cumulative impacts associated with seismic and geologic hazards.

Source Documents: *Ventura County Initial Study Assessment Guidelines of July 2010, Geotechnical Report prepared by Advanced Geotechnical Services (dated May 18, 2010), Memo from Jim O'Tousa to Andrea Ozdy (dated February 2, 2011) and E-mail from Jim O'Tousa to Andrea Ozdy (dated April 24, 2012).*

Issue (Responsible Department)	Project Impact Degree Of Effect*				Cumulative Impact Degree Of Effect*			
	N	LS	PS-M	PS	N	LS	PS-M	PS
12. Liquefaction (PWA)		X			X			

Portions of the site are located within potential liquefaction zones based on the Ventura County General Plan Hazards Appendix (Figure 2.4b). The Hazards Appendix map is a compilation of the State of California Seismic Hazards Maps for the County of Ventura and was used as the basis for delineating the potential liquefaction hazards within the County. The proposed project does not include the construction of new habitable buildings. A licensed operator will maintain the proposed OWTS pursuant to a multiyear contract that will specify the maintenance and operation standards for all emergency situations. Therefore, the potential hazards resulting from liquefaction will be less than significant. Additionally, seismic and geologic hazards are project and location specific and, therefore, would not result in cumulative impacts associated with seismic and geologic hazards.

Source Documents: Ventura County Initial Study Assessment Guidelines of July 2010, Ventura County General Plan Hazards Appendix (Figure 2.2.4b), Memo from Jim O'Tousa to Andrea Ozdy (dated February 2, 2011) and E-mail from Jim O'Tousa to Andrea Ozdy (dated April 24, 2012).

13. Seiche & Tsunami (PWA)	X				X			
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The site is not located adjacent to a closed or restricted body of water based on aerial photograph review (photos dated January 2010) and would not be subject to a seiche hazard. The project site is not located within a tsunami inundation zone based on the Ventura County General Plan, Hazards Appendix (Figure 2.6). Therefore, there will be no adverse impacts resulting from potential seiche and tsunami hazards. Additionally, seismic and geologic hazards are project and location specific and, therefore, would not result in cumulative impacts associated with seismic and geologic hazards.

Source Documents: Ventura County Initial Study Assessment Guidelines of July 2010, Ventura County General Plan Hazards Appendix (Figure 2.6), Memo from Jim O'Tousa to Andrea Ozdy (dated February 2, 2011), and E-mail from Jim O'Tousa to Andrea Ozdy (dated April 24, 2012).

14. Landslides/Mudslides (PWA)		X			X			
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The site is located in a hillside area of Ventura County. The project area does not include presently mapped landslides, based on mapping conducted by Dibblee, T.W., 1990, Geologic Map of the Point Mugu and Triunfo Pass Quadrangles. Based on an analysis conducted by the California Geological Survey, portions of the site are located in a potential seismically induced landslide zone. The proposed project does not include the construction of habitable buildings. The proposed OWTS will be maintained pursuant to a multiyear contract with a licensed operator, and with maintenance and operation standards for emergencies that involve earthquake-induced landslides and/or mudslides that could damage portions of the system. Therefore, adverse impacts resulting from landslides and mudslides will be less than

Issue (Responsible Department)	Project Impact Degree Of Effect*				Cumulative Impact Degree Of Effect*			
	N	LS	PS-M	PS	N	LS	PS-M	PS

significant. Additionally, seismic and geologic hazards are project and location specific and, therefore, would not result in cumulative impacts associated with seismic and geologic hazards.

Source Documents: Ventura County Initial Study Assessment Guidelines of July 2010, Memo from Jim O'Tousa to Andrea Ozdy (dated February 2, 2011), E-mail from Jim O'Tousa to Andrea Ozdy (dated April 24, 2012), and Geologic Map of the Point Mugu and Triunfo Pass Quadrangles prepared by T.W. Dibblee (1990).

15. Expansive Soils (PWA)	X				X			
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Legalization of the existing structures will be subject to the design provisions of the County of Ventura Building Code (VCBC) in effect at time of the construction. The expansive soil design procedures in the VCBC are intended to safeguard against major structural damage. The onsite wastewater treatment system that consists of treatment tanks and eventual infiltration into the ground below the soil utilizing deep seepage pits will not result in any significant expansive soil hazards. The legalization of the structures complying with the building code and infiltration onsite of the wastewater below the soil will not result in adverse impacts relating to expansive soil. Additionally, seismic and geologic hazards are project and location specific, and therefore the project will result in no cumulative impacts associated with seismic and geologic hazards.

Source Documents: Ventura County Initial Study Assessment Guidelines of July 2010, Memo from Jim O'Tousa to Andrea Ozdy (dated February 2, 2011), and E-mail from Jim O'Tousa to Andrea Ozdy (dated April 24, 2012).

16. Subsidence (PWA)	X				X			
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The subject property is not within the probable subsidence hazard zone as delineated on the Ventura County General Plan Hazards Appendix (Figure 2.8). Additionally, the project does not involve oil, gas, or groundwater withdrawal. Therefore, no adverse impacts related to subsidence hazards will occur as a result of the project. Furthermore, seismic and geologic hazards are project and location specific and, therefore, would result in no cumulative impacts associated with seismic and geologic hazards.

Source Documents: Ventura County Initial Study Assessment Guidelines of July 2010, Ventura County General Plan Hazards Appendix (Figure 2.8), Memo from Jim O'Tousa to Andrea Ozdy (dated February 2, 2011), and E-mail from Jim O'Tousa to Andrea Ozdy (dated April 24, 2012).

17. Hydraulic Hazards):								
a. Non-FEMA (PWA)		X				X		

The proposed OWTS will be subject to the requirements of the Ventura County Building Code Appendix J relating to grading. Appendix J requires that there be no

Issue (Responsible Department)	Project Impact Degree Of Effect*				Cumulative Impact Degree Of Effect*			
	N	LS	PS-M	PS	N	LS	PS-M	PS

increase in runoff from the property as a result of construction that may change the existing drainage patterns of the site. Cumulative impacts from the proposed project will be less than significant, as any other projects will be required to mitigate the increased runoff between undeveloped and developed conditions, as well. Therefore, the project-specific and cumulative adverse impacts relating to hydraulic hazards will be less than significant.

Source Documents: Ventura County Initial Study Assessment Guidelines of July 2010, Memo from Jim Myers to Andrea Ozdy (dated January 31, 2011), and E-mail from Jim Myers to Andrea Ozdy (dated May 15, 2012).

b. FEMA (WPD)		X				X		
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A portion of the southeast corner of the subject property is located within a 1% annual chance floodplain as evidenced on the latest "Effective" Digital Flood Insurance Rate Maps (DFIRMs) issued by the Federal Emergency Management Agency (FEMA) (January 20, 2010) (Panel 1140 of 1275, Map # 06111C1140E). These lands have been mapped by FEMA as an "Unnumbered/Approximate 'A Zone" (100-year) floodplain and an "Unshaded X Zone" (beyond the 500-year) floodplain. The applicant's civil engineering consultant, Penfield & Smith, has prepared a site plan of the proposed location of the eight structures illustrating that all structures will be out of the 1% annual chance (100-year) floodplain. All of the structures are proposed to be located in an 'Unshaded X Zone (500 year) floodplain.

Therefore, the proposed development is not subject to a Floodplain Development Permit requirement from the County of Ventura Public Works Agency (PWA). However, the applicant will be required to obtain a Floodplain Clearance from the PWA prior to the issuance of a building permit or a grading permit. Therefore, the project-specific and cumulative impacts related to flooding hazards will be less than significant.

Source Documents: Ventura County Initial Study Assessment Guidelines of July 2010, Memo from Brian Trushinski to Andrea Ozdy (dated January 19, 2011), and Memo from Brian Trushinski to Andrea Ozdy (dated April 18, 2012).

18. Fire Hazards (Fire)		X				X		
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Any additions or new construction will be required to meet the requirements of the Fire Code as adopted and amended by the Ventura County Fire Protection District (VCFPD) Current Ordinance for Fire Hazard Abatement, and the Ventura County Building Code. Compliance with the requirements of these codes will ensure that project-specific and cumulative impacts related to fire hazards will be less than significant.

Source Documents: Memo from Penny Miller to Debbie Morrisset (dated June 25, 2010) and Memo from John Dodd to Andrea Ozdy (dated January 12, 2011)

Issue (Responsible Department)	Project Impact Degree Of Effect*				Cumulative Impact Degree Of Effect*			
	N	LS	PS-M	PS	N	LS	PS-M	PS

19. Aviation Hazards (Airports)		X				X		
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The project site is not located within the sphere of influence of the Camarillo or Oxnard airports, and is not within a military training area. Additionally, the proposed project will not result in the construction of buildings or structures that would interfere with flight patterns. The OWTS is partially subterranean, with above-ground equipment and facilities that will be a maximum of 8 feet in height, without lighting. Additionally, the maximum height of structures to be permitted as part of the CUP is 35 feet. Therefore, the proposed project will result in less than significant project-specific and cumulative impacts relating to aviation hazards.

Source Document: Ventura County Initial Study Assessment Guidelines of July 2010

20. Hazardous Materials/Waste:								
a. Hazardous Materials (EH/Fire)		X				X		

The proposed project includes the use of hazardous materials. Improper storage, handling, and disposal of these material(s) could result in the creation of adverse impacts to public health. Compliance with existing State regulations will ensure that impacts do not exceed less than significant levels. Additionally, any hazardous material use and storage is required to meet the requirements of the Fire Code as adopted and amended by the VCFPD Current Ordinance. Therefore, project-specific and cumulative adverse impacts related to hazardous materials will be less than significant.

Source Documents: Memo from Penny Miller to Debbie Morrisset (dated June 25, 2010), Memo from John Dodd to Andrea Ozdy (dated January 12, 2011) and Memo from Melinda Talent to Andrea Ozdy (dated February 14, 2011).

b. Hazardous Waste (EH)	X					X		
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The proposed project is not considered an activity that generates hazardous waste. Therefore, the project will not have any project-specific or cumulative impacts relative to hazardous wastes.

Source Documents: Memo from Melinda Talent to Andrea Ozdy (dated February 14, 2011) and Memo from Melinda Talent to Andrea Ozdy (dated April 23, 2012).

21. Noise and Vibration			X				X	
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The Ventura County Initial Study Assessment Guidelines (page 119) define noise as "any unwanted sound that is undesirable because it interferes with speech and hearing, or is intense enough to damage hearing, or is otherwise annoying."

New construction is limited to installation of the new OWTS within the existing developed site. During construction related to the proposed project, noise is

Issue (Responsible Department)	Project Impact Degree Of Effect*				Cumulative Impact Degree Of Effect*			
	N	LS	PS-M	PS	N	LS	PS-M	PS

expected to be produced. However, by restricting the noise-generating activities to the days and times during which residential uses are not "noise-sensitive," noise impacts would be considered less than significant. To ensure this, the project will be subject to standard conditions of approval that limit noise-generating construction activities to the daytime (i.e., 7:00 AM to 7:00 PM, Monday through Friday, and 9:00 AM to 7:00 PM, Saturday, Sunday, and local holidays), which is the time during which residential uses typically are not noise sensitive (County of Ventura Construction Noise Threshold Criteria and Control Plan, July 2010, page 5, Figure 3).

In order for a project to have a significant noise impact from noise that is unassociated with construction activities, the Ventura County Initial Study Assessment Guidelines (page 120) state that a project must generate noise at the nearest noise sensitive use/residential district that exceeds:

- Leq(1hr) of 55 dB(A)¹ or ambient noise level plus 3 dB(A), whichever is greater, between 6:00 AM and 7:00 PM;
- Leq(1hr) of 50 dB(A) or ambient noise level plus 3 dB(A), whichever is greater, between 7:00 PM and 10:00 PM; or,
- Leq(1hr) of 45 dB(A) or ambient noise level plus 3 dB(A), whichever is greater, between 10:00 PM and 6:00 AM.

Noise sensitive uses are dwellings, schools, hospitals, nursing homes, churches and libraries.

The project site is located within 150 feet of the closest residence, which is on the eastern (opposite) side of Yerba Buena Road as the subject property, approximately 500 feet north of the intersection of Yerba Buena Road and Pacific Coast Highway. Approximately 20 beachfront residences are located on the south (opposite) side of Pacific Coast Highway as the subject property, with the closest residence located about 300 feet from the subject property. According to information provided by the applicant regarding the specifications of the sound system proposed to be used, and the Ventura County Initial Study Assessment Guidelines (page 123) which state that "In general, noise decreases by 5 dB for each doubling of the distance from the noise source" emitted noise levels may exceed the noise thresholds described above, the operation of the camp and temporary outdoor events are expected to produce noise that will exceed the three noise thresholds described above, especially when amplified sound (e.g., music) is used during events. This is a potentially significant impact. However, with the implementation of Mitigation Measure MM-5 (below), this

¹ A-weighted sound level [dB(A)] refers to the sound pressure level measured using the A-weighting network, a filter which discriminates against low and very high frequencies in a manner similar to the human hearing mechanism at moderate sound levels [Ventura County Initial Study Assessment Guidelines (2011)].

Issue (Responsible Department)	Project Impact Degree Of Effect*				Cumulative Impact Degree Of Effect*			
	N	LS	PS-M	PS	N	LS	PS-M	PS

potentially significant impact related to noise generated on-site will be reduced to less than significant levels.

There is no Resource Management Agency record of complaints regarding the camp use, noise or otherwise, during its 50-year history. Furthermore, the Sheriff's Department has no record of complaints of noise or nuisances related to the camp use. However, the proposed use includes an expansion of the existing, previously-approved occupancy from 530 people to 549 people, and temporary events that have the potential to create additional noise that—although it may not exceed the significance levels set forth above—may constitute a nuisance for the surrounding area. Therefore, conditions of approval will be placed on the permit to ensure that the noise levels resulting from special events do not become a nuisance. One condition will require a designated "Contact Person" to be available and responsible for responding to complaints during an event. Another condition will establish a "Resolution of Noise Complaints" process for neighbors to contact the event coordinator during an event if noise becomes a nuisance, and steps for the coordinator to take to reduce noise levels from the event. Also, a condition will require the Permittee to submit an "Events Report Form" on an annual basis. The form will require specific information about each event held on the property, including but not limited to:

- Designation of type of temporary event;
- Date and hours of event;
- Number of guests;
- Number of vehicles;
- Whether or not the Ventura County Sheriff's Department was called to the site for traffic or noise-related complaints;
- Whether noise complaints were received and resolved; and
- Whether or not a sound monitor was used during an event.

Mitigation Measure MM-5: Maintenance of Noise Levels

Purpose: To reduce project-generated noise to a less-than-significant level, and ensure that noise levels do not exceed the maximum acceptable noise levels for residential uses that are located within proximity to the project site, pursuant to Ventura County General Plan *Goals, Policies and Programs* (2011) Noise Policy 2.16.2-1.

Requirement: The Permittee shall use a sound monitoring system to monitor the sound emissions at 10 feet from the amplified speakers for events, with the meter set to the "A-weighting, slow response" scale. The Permittee shall use the sound level measurement system to monitor and, if required, adjust the sound levels from amplified music and PA's, such that the sound levels do not exceed: 80 dBA Leq (1hr) during the daytime hours (between 6 A.M. and 7 P.M.); 75 dBA Leq (1hr) during

Issue (Responsible Department)	Project Impact Degree Of Effect*				Cumulative Impact Degree Of Effect*			
	N	LS	PS-M	PS	N	LS	PS-M	PS

the evening hours (between 7 P.M. and 10 P.M.); and, 70 dBA Leq (1hr) during the nighttime hours (between 10 P.M. and 6 A.M.).

Documentation: The Permittee shall indicate on the Events Report Form (which must be submitted annually to the Ventura County Planning Division), whether or not a sound monitoring system was used for each event held throughout the calendar year.

Prior to the issuance of the Zoning Clearance for use inauguration, and annually thereafter on February 1st, the Permittee shall provide the Planning Director and all residents within 500 feet of the parcel on which the Project site is located with the contact information (e.g., name and/or position title, address, phone number, mailing and email addresses, and business and cell phone numbers) of the person who receive all orders, notices, and communications regarding matters of condition and code compliance at the CUP site (“Contact Person”).

Prior to the issuance of the Zoning Clearance for use inauguration, the Permittee shall post the phone number of the designated Contact Person in a visible location on the site. The Contact Person shall be available via telephone on a 24-hour basis. Persons with concerns about an event as it is occurring may directly contact the Contact Person.

Timing: A sound monitoring system shall be used for all events using amplified sound, for the entire duration of the event.

Monitoring: During the life of the permit, the Contact Person shall respond to noise complaints immediately upon receiving a noise complaint from a nearby resident during an event that is permitted as part of this CUP. (See Project Description, Condition No.1 above.) The Contact Person shall investigate the complaint to ascertain if any of the following actions can be taken to reduce noise levels below the maximum allowed:

- (1) Lower speaker volumes of PA systems and/or amplified music;
- (2) Discontinue the use of PA systems;
- (3) Discontinue the use of amplified music and replace it with acoustical music; and/or,
- (4) Alter the timing and sequence of event activities to comply with the maximum noise standards.

During the life of the CUP, the RMA, Planning Division shall monitor applicable noise complaints received from the public. Any complaints received will be investigated by RMA-Planning Division-Condition Compliance Staff.

Source Documents: Ventura County Initial Study Assessment Guidelines of July

Issue (Responsible Department)	Project Impact Degree Of Effect*				Cumulative Impact Degree Of Effect*			
	N	LS	PS-M	PS	N	LS	PS-M	PS

2010, County of Ventura Construction Noise Threshold Criteria and Control Plan, July 2010, and E-mail from Sgt. Monica McGrath to Andrea Ozdy (dated January 21, 2011)

22. Daytime Glare		X				X		
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The proposed project includes the construction of limited new above-ground facilities associated with the OWTS and the legalization of several existing structures, which are all either not visible from public viewing locations or are screened from view. The majority of the development related to the construction of the new OWTS will be subterranean. Existing unlit sports areas located immediately north of PCH are buffered from the highway by an approximately 10-foot high landscaped berm. Additionally, the existing previously-permitted monument sign visible from Pacific Coast Highway and Yerba Buena Road does not contain reflective materials or surfaces, and will therefore not create daytime glare in the direction of public viewing locations. Therefore, project-specific and cumulative impacts related to daytime glare will be less than significant.

Source Document: Ventura County Initial Study Assessment Guidelines of July 2010.

23. Public Health (EH)		X				X		
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The proposed project may have impacts to public health from hazardous materials and onsite sewage disposal (septic system). Compliance with applicable state and county regulations enforced by the Environmental Health Division will reduce potential impacts to a level considered less than significant.

Source Documents: Memo from Melinda Talent to Andrea Ozdy (dated February 14, 2011) and Memo from Melinda Talent to Andrea Ozdy (dated April 23, 2012).

24. Greenhouse Gases (APCD)		X			X			
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The VCAPCD has not yet adopted any approach to setting a threshold of significance for land use development projects in the area of project greenhouse gas emissions. The proposed project will generate less than significant impacts to regional and local air quality and the proposed project will be subject to a condition of approval to ensure that all project construction and operations shall be conducted in compliance with all VCAPCD Rules and Regulations. Furthermore, the amount of greenhouse gases anticipated from the project will be a small fraction of the levels being considered by the VCAPCD for greenhouse gas significance thresholds and far below those adopted to date by any air district in the state. Therefore, the project specific and cumulative impacts related to greenhouse gases resulting from the project will be less than significant.

Source Document: Ventura County Initial Study Assessment Guidelines of July 2010.

Issue (Responsible Department)	Project Impact Degree Of Effect*				Cumulative Impact Degree Of Effect*			
	N	LS	PS-M	PS	N	LS	PS-M	PS

LAND USE:

25. Community Character (PIng.)		X				X		
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The project site is located in the southern portion of the sparsely populated area of the Santa Monica Mountains near Malibu. The Santa Monica Mountains consist primarily of undeveloped open space areas, with residential development on parcels typically several acres in size. A portion of the project site is across Yerba Buena Road and immediately west of a restaurant known as "Neptune's Net," and across PCH from beach houses on parcels ranging from 2,614 sq.ft. to 2.71 acres in size. Additionally, two existing residences on the eastern side of Yerba Buena Road are located approximately 150 feet and 1,000 feet from the subject property, and custom homes are currently under construction approximately 2,000 feet east of Neptune's Net. Surrounding development consists of structures varying in size from approximately 2,000 sq.ft. to approximately 10,000 sq.ft., consisting of both single-story buildings and multi-level structures with a maximum height of approximately 27 feet. While the height of the tallest structure on the project site is 35 feet, structures are screened by existing vegetation and topography, and those structures closest to Yerba Buena Road are below the level of the road. The proposed project complies with the development standards (e.g., maximum building height, maximum building coverage, and minimum setback requirements) of the CRE-10 ac/M, CRE-20 ac/M, and COS-10 ac-sdf/M zones. Additionally, the proposed activities are consistent with previously permitted activities and, therefore, will not alter the current community character. Furthermore, the above-ground components of the proposed OWTS will be shielded from view from Yerba Buena Road and PCH, and neighboring properties. The proposed project will take public access from Yerba Buena Road, and the road is not proposed to be expanded. Therefore, project-specific and cumulative impacts related to community character will be less than significant.

Source Document: Ventura County Initial Study Assessment Guidelines of July 2010.

26. Housing (PIng.)	X					X		
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The proposed project does not involve the destruction of existing housing, and will not create a long-term demand for additional new housing. Construction is temporary and will not generate a significant number of workers who will require the construction of additional housing, in order to accommodate. As discussed above, the project includes the continued employment of 32 full-time employees related to the existing camp operation previously permitted under CUP 1321. Therefore, the proposed project will not result in individual or cumulative adverse impacts to existing housing or demand for additional housing.

Source Document: Ventura County Initial Study Assessment Guidelines of July 2010

Issue (Responsible Department)	Project Impact Degree Of Effect*				Cumulative Impact Degree Of Effect*			
	N	LS	PS-M	PS	N	LS	PS-M	PS
PUBLIC FACILITIES AND SERVICES:								
27. Transportation/Circulation:								
a. Roads and Highways:								
(1) Level of Service (PWA)		X				X		

The proposed continued use of the existing facility, the legalization of several non-habitable structures, and the construction of the proposed OWTS will not generate new traffic on the local public roads, and the approved land use will not change. An increase from the previously permitted maximum of 530 people on site to a new maximum of 549 is not expected to result in a change in the level of service to public roads. From June to August, the applicant proposes to bus campers to the site. The project-specific and cumulative impacts of this project on the Regional Road Network or local roads near the project site will be less than significant.

Source Documents: Memo from Behnam Emami to Andrea Ozdy (dated December 8, 2011), and Memo from Behnam Emami to Andrea Ozdy (dated June 14, 2011).

(2) Safety/Design of Public Roads(PWA)		X			X			
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The proposed continued use of the facility and construction of the proposed OWTS will not generate new traffic on the local public roads, and the approved land use will not change. An increase from the previously permitted maximum of 530 people on site to a new maximum of 549 for camp use and special events is not expected to result in a change in the level of service to public roads. The increase in trips associated with the project are not expected to have the potential to alter the level of safety of the nearest County local road. The existing road systems in the Yerba Buena Area are not considered standard and, as such, the Transportation Department recommends a condition of approval that ensures that this information is disclosed to the applicant and any successors in interest of the properties in the area. Although the existing roads in the area do not create a substantial risk of injury, they are still considered substandard and rural in nature with widths, grades, and other road features and should be used with due care. With the implementation of the Notice of Substandard Access Roads disclosure, the adverse traffic impacts related to safety and design will be less than significant.

The project-specific and cumulative impacts of this project on the Regional Road Network or local roads near the project site will be less than significant.

Source Documents: Memo from Behnam Emami to Andrea Ozdy (dated December 8, 2011), and Memo from Behnam Emami to Andrea Ozdy (dated June 14, 2011).

(3) Safety/Design of Private Access (Fire)		X			X			
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Any future construction will be required to comply with current VCFPD Access Standards, and current VCFPD access standards must be maintained by the Permittee. The Permittee is required to maintain 20-foot wide roads throughout the property except when exemptions allow for 15-foot wide roads, as well as VCFPD

Issue (Responsible Department)	Project Impact Degree Of Effect*				Cumulative Impact Degree Of Effect*			
	N	LS	PS-M	PS	N	LS	PS-M	PS

turnarounds. Additionally, all roads will be maintained with an all-weather surface suitable for access by VCFPD apparatus. Therefore, the proposed project will have less than significant project-specific and cumulative impacts related to the safety and design of the private driveway and tactical access.

Source Document: Memo from Penny Miller to Debbie Morrisset (dated June 25, 2010) and Memo from John Dodd to Andrea Ozdy (dated January 12, 2011)

(4) Tactical Access (Fire)		X				X		
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Any future construction will be required to comply with current VCFPD Access Standards, and current VCFPD access standards must be maintained by the Permittee. Therefore, the proposed project will have less than significant project-specific and cumulative impacts related to tactical access.

Source Document: Memo from Penny Miller to Debbie Morrisset (dated June 25, 2010) and Memo from John Dodd to Andrea Ozdy (dated January 12, 2011)

b. Pedestrian/Bicycle (PWA/Plng.)		X				X		
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The Transportation Department determined that the proposed project will not generate significant pedestrian and bicycle traffic. There are no schools, commercial centers, or transit stops in the immediate area of the project site which would generate significant pedestrian and bicycle traffic, or with which the proposed project could interfere. Although the nearest County road (Yerba Buena Road) does not have pedestrian or bicycle facilities, the road standards that would be applied to the rural roads in this area would not require pedestrian and bicycle facilities. Therefore, adverse project-specific and cumulative impacts relating to the supplementary addition of pedestrians and bicycles in the area would be less than significant.

Source Documents: Memo from Behnam Emami to Andrea Ozdy (dated December 8, 2011), and Memo from Behnam Emami to Andrea Ozdy (dated June 14, 2011).

c. Bus Transit	X				X			
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The project site is not located near any bus transit facilities. The reauthorization of an existing camp use and special events, and an increase from the previously permitted maximum of 530 people on site to a new maximum of 549 is not expected to interfere with existing bus transit facilities or routes, or create a substantial demand for bus transit facilities and services. Therefore, the project will have no project-specific or cumulative adverse impacts on existing bus transit.

Source Documents: Ventura County Initial Study Assessment Guidelines of July 2010.

Issue (Responsible Department)	Project Impact Degree Of Effect*				Cumulative Impact Degree Of Effect*			
	N	LS	PS-M	PS	N	LS	PS-M	PS
d. Railroads	X				X			

The construction of an OWTS and the legalization of several structures at an existing camp facility will not interfere with an existing railroad's facilities or operations, as the project site is located at least 11 miles from the nearest railroad (Southern Pacific Railroad), is not proposed to be served by the existing railway system, and does not involve the use or expansion of any railroad crossings. Therefore, no project-specific or cumulative impacts related to railroads will result from the proposed project.

Source Document: Ventura County Initial Study Assessment Guidelines of July 2010.

e. Airports (Airports)	X				X			
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The project site is located at the base of the Santa Monica Mountains at the intersection of PCH and Yerba Buena Road. It is not located near an airport or within the Sphere of Influence of any of the following airports: Santa Paula, Oxnard, Camarillo, and the Ventura County Naval Base. Therefore, the proposed project will have no adverse project-specific or cumulative impacts on existing airport activities and facilities.

Source Document: Ventura County Initial Study Assessment Guidelines of July 2010

f. Harbors (Harbors)	X				X			
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The proposed project site is not adjacent to any harbor and, therefore, will not affect the operations of a harbor in any way, or increase the demands on harbor facilities. Therefore, the proposed project will have no adverse project-specific or cumulative impacts to harbor facilities.

Source Document: Ventura County Initial Study Assessment Guidelines of July 2010.

g. Pipelines	X				X			
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The proposed project will not substantially interfere with or affect the operation of an existing pipeline, as no pipeline runs under or adjacent to the proposed site. Therefore, the proposed project will have no adverse impacts to pipelines.

Source Document: Ventura County Initial Study Assessment Guidelines of July 2010, Ventura County General Plan Public Facilities and Services Appendix (Figure 4.2.5), and Ventura County Planning GIS – Major Pipelines and Minor Pipelines layers (accessed January 20, 2011).

28. Water Supply:								
a. Quality (EH)	X				X			

The public water system which will continue to serve domestic water to this project is regulated by the State Department of Health Services. The quality of domestic water

Issue (Responsible Department)	Project Impact Degree Of Effect*				Cumulative Impact Degree Of Effect*			
	N	LS	PS-M	PS	N	LS	PS-M	PS

must be in compliance with applicable State drinking water standards. The design and construction of the proposed project must conform with applicable State and Building Code requirements pertaining to water systems. Therefore, there will be no adverse project-specific or cumulative impacts to the quality of water supplied by the public water system.

Source Documents: Memo from Melinda Talent to Andrea Ozdy (dated February 14, 2011) and Memo from Melinda Talent to Andrea Ozdy (dated April 23, 2012).

b. Quantity (PWA)		X				X		
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Water service will remain unchanged as supplied by the nearby or onsite wells owned by the Yerba Buena Water Company. This State-licensed water supplier is considered to have the ability to provide a permanent supply of domestic water for the anticipated life of the project. Therefore, impacts related to water quantity will be less than significant.

Source Documents: Ventura County Initial Study Assessment Guidelines of July 2010 and Memos from Rick Viergutz to Andrea Ozdy (dated December 14, 2010, and January 27, 2011).

c. Fire Flow (Fire)		X				X		
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Water supply for fire protection will be required to meet VCFPD Standards and Current Ordinance for any future construction. Therefore, project-specific and cumulative impacts related to fire flow will be less than significant.

Source Document: Memo from Penny Miller to Debbie Morrisset (dated June 25, 2010) and Memo from John Dodd to Andrea Ozdy (dated January 12, 2011).

29. Waste Treatment/Disposal:								
a. Individual Sewage Disposal System (EH)		X				X		

A portion of the project will utilize existing individual septic systems. Information submitted with the project application indicates that the systems are functioning properly. In addition, portions of the proposed project will be connected to an OWTS. The discharges from the treatment systems are regulated by the Los Angeles Regional Water Quality Control Board. Compliance with applicable State and County regulations with respect to the design and operation of the OWTS will ensure that any project-specific or cumulative impacts resulting from the on-site sewage disposal will be maintained at less than significant levels.

Source Documents: Memo from Melinda Talent to Andrea Ozdy (dated February 14, 2011) and Memo from Melinda Talent to Andrea Ozdy (dated April 23, 2012).

Issue (Responsible Department)	Project Impact Degree Of Effect*				Cumulative Impact Degree Of Effect*			
	N	LS	PS-M	PS	N	LS	PS-M	PS
b. Sewage Collection/Treatment Facilities (EH)	X				X			

The proposed project does not include connection to a public sewer. Therefore, the project will not have any impacts to a sewage collection facility.

Source Documents: Memo from Melinda Talent to Andrea Ozdy (dated February 14, 2011) and Memo from Melinda Talent to Andrea Ozdy (dated April 23, 2012).

c. Solid Waste Management (PWA)		X				X		
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Pursuant to the Public Works Agency, Integrated Waste Management Division's factors for determining the significance of project impacts to solid waste facilities within Ventura County, any discretionary development project generating solid waste will impact the County's remaining solid waste disposal capacity. Additionally, as required by California Public Resources Code (PRC) 41701, Ventura County's Countywide Siting Element (CSE), adopted in June of 2001 and updated annually, confirms that Ventura County has at least 15 years of disposal capacity available for waste generated by in-County projects. Therefore, because the County currently exceeds the minimum disposal capacity required by the PRC, no individual project will have a significant impact upon remaining Ventura County solid waste disposal capacity. Therefore, project-specific and cumulative adverse impacts related to solid waste management will be less than significant.

Source Documents: Memo from Derrick Wilson to Andrea Ozdy (dated January 13, 2011) and Memo from Derrick Wilson to Andrea Ozdy (dated May 3, 2012).

d. Solid Waste Facilities (EH)	X				X			
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The proposed project does not include a solid waste facility. Therefore, the project will not create any adverse project-specific or cumulative impacts relating to the construction or operation of a new solid waste facility.

Source Documents: Memo from Melinda Talent to Andrea Ozdy (dated February 14, 2011) and Memo from Melinda Talent to Andrea Ozdy (dated April 23, 2012).

30. Utilities	X				X			
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According to information provided as part of the project application, the project site is already served by the following existing utility connections: gas – AAA Propane Services; electricity – Southern California Edison; phone – Verizon; and, cable – Charter Cable. The proposed project does not include an expansion of the existing utility services and, therefore, does not include an expansion of the existing facilities. Therefore, there will be no adverse project-specific or cumulative impacts to utility services as a result of the project.

Source Document: Ventura County Initial Study Assessment Guidelines of July 2010

Issue (Responsible Department)	Project Impact Degree Of Effect*				Cumulative Impact Degree Of Effect*			
	N	LS	PS-M	PS	N	LS	PS-M	PS
31. Flood Control/Drainage:								
a. WPD Facilities/Watercourses (WPD)		X				X		

The proposed project includes the installation of an OWTS and supporting equipment, as well as the legalization of several existing structures on site. Any increase in impervious area and the associated increase in surface runoff must be addressed in accordance with Watershed Protection District standards as a part of the final engineering process.

Little Sycamore Canyon, a WPD jurisdictional red line channel, runs through the easterly portion of the site. Any activity in, on, over, under or across the jurisdictional red line channel requires a permit from the Watershed Protection District. In addition, the applicant may not impair, divert, impede or alter the characteristics of the flow of water running in or to the jurisdictional red line channel. Research of permit files for Little Sycamore Canyon reveals Permit Number 1992-020 for work near the southerly property boundary described as follows: "To allow construction of storm drain outlet with rock riprap dissipater for Grading Permit 8256, CUP 1321-9 PCH Malibu." The completion date of the permit is identified as February 28, 1992.

The Drainage Report dated December 13, 2010, shows the limits of calculated potential flooding within the site from a 100-year storm event. Structures potentially affected include the basketball court, 1st pedestrian bridge, small shed, Building 2 Maintenance Shop, Building 5 Maintenance Restroom, 1st vehicle bridge, arts and crafts building and restroom, 2nd vehicle bridge, Baruh Hall/Pool Restroom, Pool, wood plank bridge, 3rd vehicle bridge, Pool Pump Building, Judy Lee Wolf Dance Stage, 2nd pedestrian bridge and small shed, 4th vehicle bridge, 3rd pedestrian bridge, L.V. Cabins 1 through 3, and 5th vehicle bridge. (See attached site plan for the proposed location of the buildings and structures.) An Encroachment Permit is required prior to the issuance of a Zoning Clearance for construction for the OWTS and structures to be legalized, which will ensure that impacts to flood control facilities/watercourses will be maintained at less than significant levels.

The proposed OWTS includes sewer collection system lines from the middle and lower camps that appear to cross Little Sycamore Canyon at four locations, terminating near Yerba Buena Road and PCH at the OWTS. The treatment facilities appear to be exterior of the bed and banks of Little Sycamore Canyon and exterior of the flood limits described in the project Drainage Report. The Watershed Protection District recommends the imposition of a condition to require an Encroachment Permit for any wastewater line crossings across Little Sycamore Canyon. The required Encroachment Permit will ensure that all necessary stream crossing protections are in place in order to avoid any potential impacts to Little Sycamore Canyon.

Therefore, the proposed project will result in a less than significant project-specific and cumulative impact related to red line channels under the jurisdiction of the Watershed Protection District.

Issue (Responsible Department)	Project Impact Degree Of Effect*				Cumulative Impact Degree Of Effect*			
	N	LS	PS-M	PS	N	LS	PS-M	PS

Source Documents: Ventura County Initial Study Assessment Guidelines of July 2010, Memo from Tom Wolfington to Andrea Ozdy (dated January 28, 2011), Memo from Tom Wolfington to Andrea Ozdy (dated May 17, 2012), and Drainage Report prepared by Penfield & Smith (dated December 13, 2010).

b. Other Facilities/Watercourses (PWA)		X				X		
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The proposed project will be subject to the requirements of the Ventura County Building Code Appendix J relating to grading. Appendix J requires that there be no increase in runoff from the property. Cumulative impacts from the proposed project will be less than significant, as any other projects will be required to mitigate the increased runoff between undeveloped and developed conditions, as well. Therefore, the adverse project-specific and cumulative impacts to drainage facilities not owned by the Watershed Protection District are considered to be less than significant.

Source Documents: Ventura County Initial Study Assessment Guidelines of July 2010 and Memo from Jim Myers to Andrea Ozdy (dated January 31, 2011).

32. Law Enforcement/Emergency Svs. (Sheriff):		X				X		
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The proposed project for the reauthorization of an existing camp facility has no history of a need for law enforcement intervention related to the existing, expired camp use (Camp Hess Kramer), permitted as CUP 1321. An increase from the previously permitted maximum of 530 people on site to a new maximum of 549 will not result in an expansion of the use that would create an additional demand on law enforcement or emergency services. Therefore, the project-specific and cumulative impacts to the functions of the Ventura County Sheriff's Department or emergency services with respect to the project will be less than significant.

Source Document: Ventura County Initial Study Assessment Guidelines of July 2010 and Memo from Sgt. Monica McGrath to Andrea Ozdy (dated January 21, 2011).

33. Fire Protection (Fire):								
a. Distance/Response Time		X				X		

Distance from a full-time, paid fire station is adequate (County Fire Station 56 is less than one mile from the project site). Therefore, the proposed project will result in less than significant adverse project-specific or cumulative impacts related to VCFPD distance/response time.

Source Document: Memo from Penny Miller to Debbie Morrisset (dated June 25, 2010) and Memo from John Dodd to Andrea Ozdy (January 12, 2011).

Issue (Responsible Department)	Project Impact Degree Of Effect*				Cumulative Impact Degree Of Effect*			
	N	LS	PS-M	PS	N	LS	PS-M	PS
b. Personnel/Equipment/Facilities		X				X		

Distance from a full-time, paid fire station is adequate (County Fire Station 56 is less than one mile from the project site). Therefore, the proposed project will result in less than significant adverse project-specific or cumulative impacts to VCFPD personnel, equipment, and facilities.

Source Document: Memo from Penny Miller to Debbie Morrisset (dated June 25, 2010) and Memo from John Dodd to Andrea Ozdy (January 12, 2011).

34. Education:								
a. Schools	X				X			

The Oxnard Union and Ocean View School Districts serve the project area. However, the proposed project is not a residential use and would not generate additional demand on local schools. Furthermore, there are no schools located within the vicinity of the project site with which the operation of the camp, temporary events, or construction activities associated with the OWTS, could interfere. Therefore, no adverse impact to schools will result from the proposed project.

Source Documents: Ventura County General Plan and Ventura County Initial Study Assessment Guidelines of July 2010 and Planning GIS High School and Elementary School data layers (accessed January 20, 2011)

b. Libraries (Lib. Agency)	X				X			
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The proposed project is non-residential. Additionally, the proposed project site is not located in the vicinity of a library and the functions of the facility will not require the use of a public library. Therefore, the proposed project will result not result in adverse project-specific or cumulative impacts related to libraries.

Source Documents: Ventura County General Plan and Ventura County Initial Study Assessment Guidelines of July 2010

35. Recreation (GSA):		X			X			
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An increase from the previously permitted maximum of 530 people on site to a new maximum of 549 will not result in significant new or additional demands on recreational needs, and will not impede future development of recreation parks/facilities and/or regional trails/corridors. Recreational areas are provided in the form of regional parks, trails, and corridors provided by Federal, State, County, quasi-public and local facilities, such as the Los Padres National Forest, Santa Monica Mountains National Recreational Area, Channel Islands National Parks, and the recreational lakes of Piru and Casitas. The project site is not located in the vicinity of any of the public recreational areas, except for public beaches that are managed by the California State Parks. However, the proposed project site is separated from public beaches by State Route 1 and, due to the distance and separation from the public beaches, does not have the potential to interfere with the use of those beaches.

Issue (Responsible Department)	Project Impact Degree Of Effect*				Cumulative Impact Degree Of Effect*			
	N	LS	PS-M	PS	N	LS	PS-M	PS

Furthermore, the reauthorization of an existing, expired camp would not result in increased demand for recreational facilities. Therefore, the proposed project will have a less than significant project-specific or cumulative impact on recreation.

Source Documents: Ventura County General Plan and Ventura County Initial Study Assessment Guidelines of July 2010

Degree of Effect:

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

Agencies:

Airports - Department Of Airports
 EH - Environmental Health Division
 Harbors - Harbor Department
 PWA - Public Works Agency

Ag. Dept. - Agricultural Department
 Fire - Fire Protection District
 Lib. Agency - Library Services Agency
 Sheriff - Sheriff's Department

APCD - Air Pollution Control District
 GSA - General Services Agency
 Plng. - Planning Division
 WPD - Watershed Protection District

Section C. - Mandatory Findings of Significance

Based on the information contained within Sections B and C:	Yes/ Maybe	No
1. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	X	
2. Does the project have the potential to achieve short-term, to the disadvantage of long-term, environmental goals? (A short-term impact on the environment is one that occurs in a relatively brief, definitive period of time while long-term impacts will endure well into the future).		X
3. Does the project have impacts that are individually limited, but cumulatively considerable? "Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effect of other current projects, and the effect of probable future projects. (Several projects may have relatively small individual impacts on two or more resources, but the total of those impacts on the environment is significant).		X
4. Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?		X

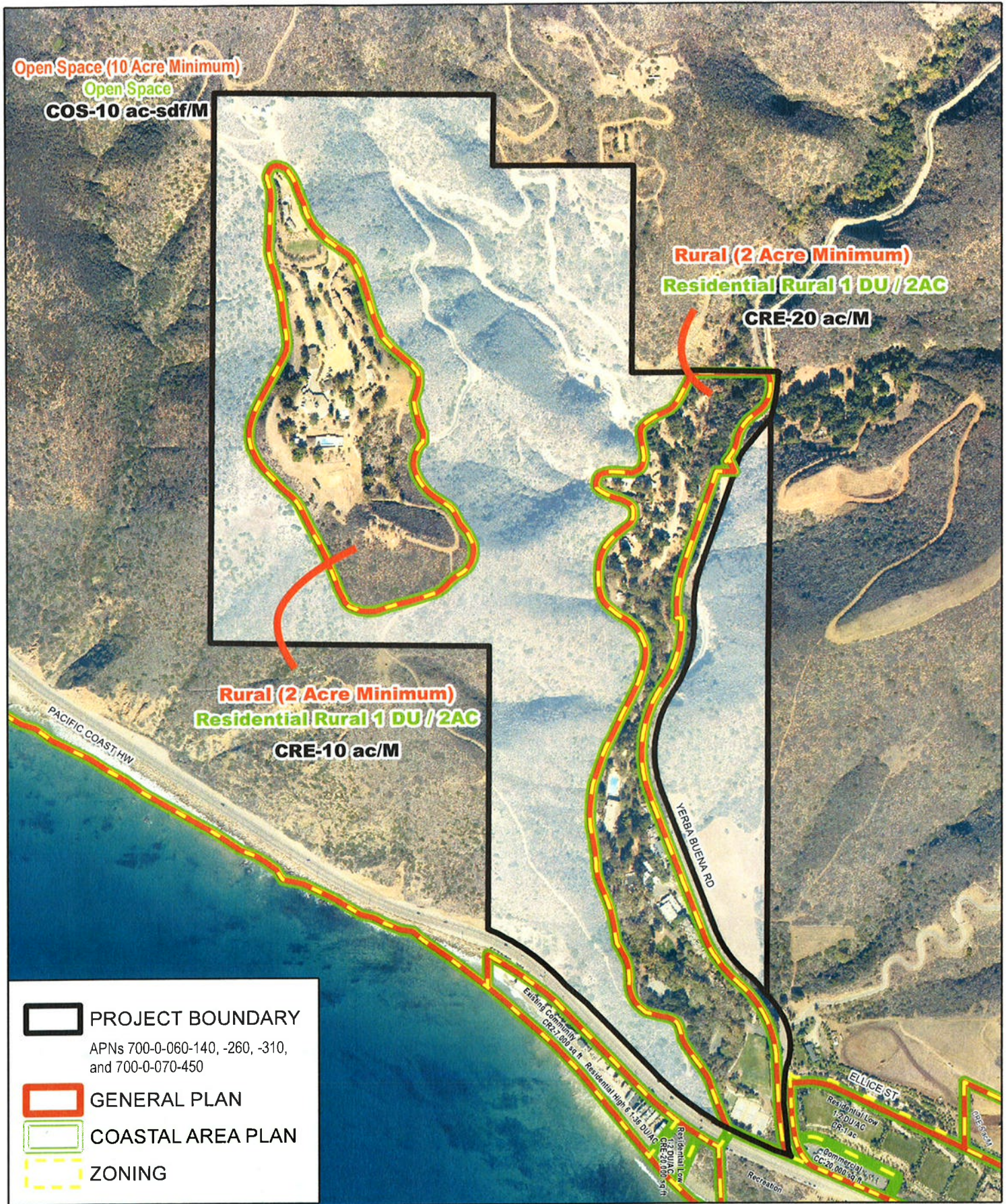
Section D. - Determination of Environmental Document

On the basis of this initial evaluation:

[]	I find the proposed project could not have a significant effect on the environment, and a Negative Declaration should be prepared.
[X]	I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because the mitigation measure(s) described in section C of the Initial Study will be applied to the project. A Mitigated Negative Declaration should be prepared.
[]	I find the proposed project, individually and/or cumulatively, MAY have a significant effect on the environment and an Environmental Impact Report is required.*
[]	I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An Environmental Impact Report is required, but it must analyze only the effects that remain to be addressed.
[]	I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or Negative Declaration pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or Negative Declaration, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Andrea Ozdy
Andrea Ozdy, Planner

4/22/13
Date



Ventura County
Resource Management Agency
Information Systems

Date Printed: 04/23/2013

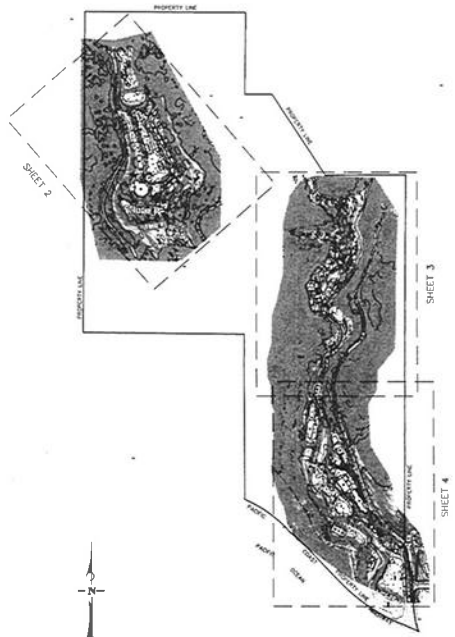
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LU10-0069 General Plan, Area Plan & Zoning

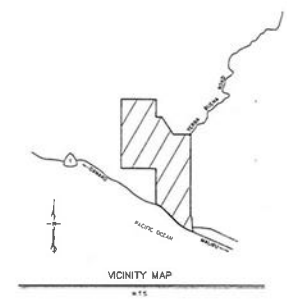
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Disclaimers: this map was created by the Ventura County Resource Management Agency, Mapping Services - GIS, which is designed and operated solely for the convenience of the County and related public agencies. The County does not warrant the accuracy of this map and no decision involving a risk of economic loss or physical injury should be made in reliance therein





SHEET LAYOUT INDEX
40 SCALE FEET



PROPERTY OWNER / ADJACENT

OWNER: W. HARRIS, FADNER & BROTHERS
 281 WALNUT ST.
 LOS ANGELES, CA 90012
 (213) 558-1111

PROJECT SITE ADDRESS

CAMP HESS PRIME
 1125 PACIFIC COAST HIGHWAY (STATE HIGHWAY 1)
 MALIBU, CA 90262
 (310) 454-7461
 (310) 454-9664

ENGINEER

WES HOSKING, P.E. 2001
 111 EAST WASHINGTON STREET
 SANTA ANITA, CA 91080
 (909) 868-8828

SURVEYOR

DAVE FULLER, PLS. 1987
 2017 FORTY-NINTH STREET
 CAROLINA, CA 92008
 (619) 591-0100

LAND USE CONSULTANT

ALBERT WELCH
 1201 WEST 10TH STREET
 CAROLINA, CA 92008
 (619) 591-0100

ASSESSOR'S INFORMATION

ASSESSOR'S PARCEL NUMBER	ADDRESS	OFFICIAL PLAN	ZONE DESIGNATION
APN 700-000-040	0100 ACRES	DEVELOPED AGRIC.	DEVELOPED AGRIC.
APN 700-000-010	0100 ACRES	RAILROAD (10 ACRE MAP)	RAILROAD EXCLUSIVE
APN 700-000-140	0100 ACRES	UNDEVELOPED AGRIC.	UNDEVELOPED AGRIC.
APN 700-000-200	0100 ACRES	OPEN SPACE (10 ACRE MAP)	UNDEVELOPED AGRIC.

CAMP HESS PRIME USE OF RESIDENCE AS DEFINED BY CALIFORNIA COUNTY GOV'TAL. (BONAVIDE SECTION 17144) IS PROHIBITED UNDER ZONE AND SECTION 17170-17174. DEVELOPMENT OF RESIDENCE OR OTHER STRUCTURE ON CAMP HESS PRIME AND OTHER CEMETERY AREAS EXCEPT THOSE IN THESE AREAS ARE STRICTLY PROHIBITED UNDER THESE ZONES. CAMP HESS PRIME IS PROHIBITED IN THE ZONE AND A CAMP IS DEFINED AS A BUILDING OR OTHER STRUCTURE OR OTHER DEVELOPMENT AND ANY OTHER DEVELOPMENT AND STRUCTURE AND BUILDING WHICH ARE USED FOR RECREATION, RESIDENCE, OR OTHER PURPOSES, AND WHICH DEVELOPMENT OR STRUCTURE IS PROHIBITED BY THE ZONE.

PROJECT STATISTICS

DEVELOPMENT (CONCRETE/STEEL/WOOD/ALUMINUM)	OTHER RIGID STRUCTURE	RESIDENCE AREA	TOTAL
0.00	0.00	0.00	0.00

HABITAT CAMP OCCUPANCY

DEVELOPED AREA OF HABITAT CAMP OCCUPANCY AND CAMP HESS PRIME IS ZONED GENERAL AGRIC. EXCLUSIVE. ALL OTHER AREAS ARE ZONED GENERAL OPEN SPACE.

FLOOD ZONE

SECTION 17170 OF THE CALIFORNIA GOV'TAL. (BONAVIDE SECTION 17170) IS PROHIBITED UNDER ZONE AND SECTION 17170-17174. DEVELOPMENT OF RESIDENCE OR OTHER STRUCTURE ON CAMP HESS PRIME AND OTHER CEMETERY AREAS EXCEPT THOSE IN THESE AREAS ARE STRICTLY PROHIBITED UNDER THESE ZONES.

WATER SERVICE

WATER SERVICE AVAILABLE

WASTEWATER SERVICE

PRIVATE SEWER SYSTEM WITH SEWER TANKS

SHEET INDEX

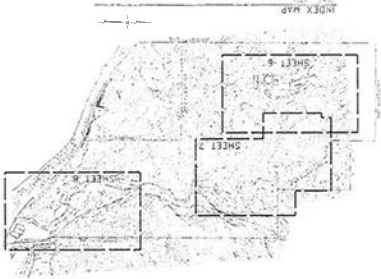
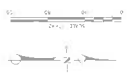
SHEET 1	TITLE SHEET
SHEET 2	TOPOGRAPHIC MAP / SITE PLAN (OVERALL)
SHEET 3	TOPOGRAPHIC MAP / SITE PLAN
SHEET 4	TOPOGRAPHIC MAP / SITE PLAN
SHEET 5	TOPOGRAPHIC MAP / SITE PLAN
SHEET 6	PROPOSED TREATMENT SYSTEM LAYOUT
SHEET 7	PROPOSED TREATMENT SYSTEM LAYOUT
SHEET 8	PROPOSED TREATMENT SYSTEM LAYOUT

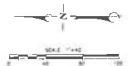
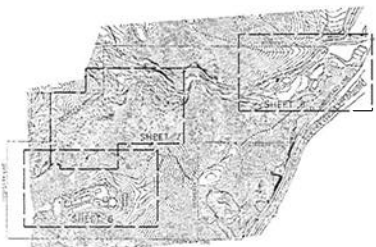
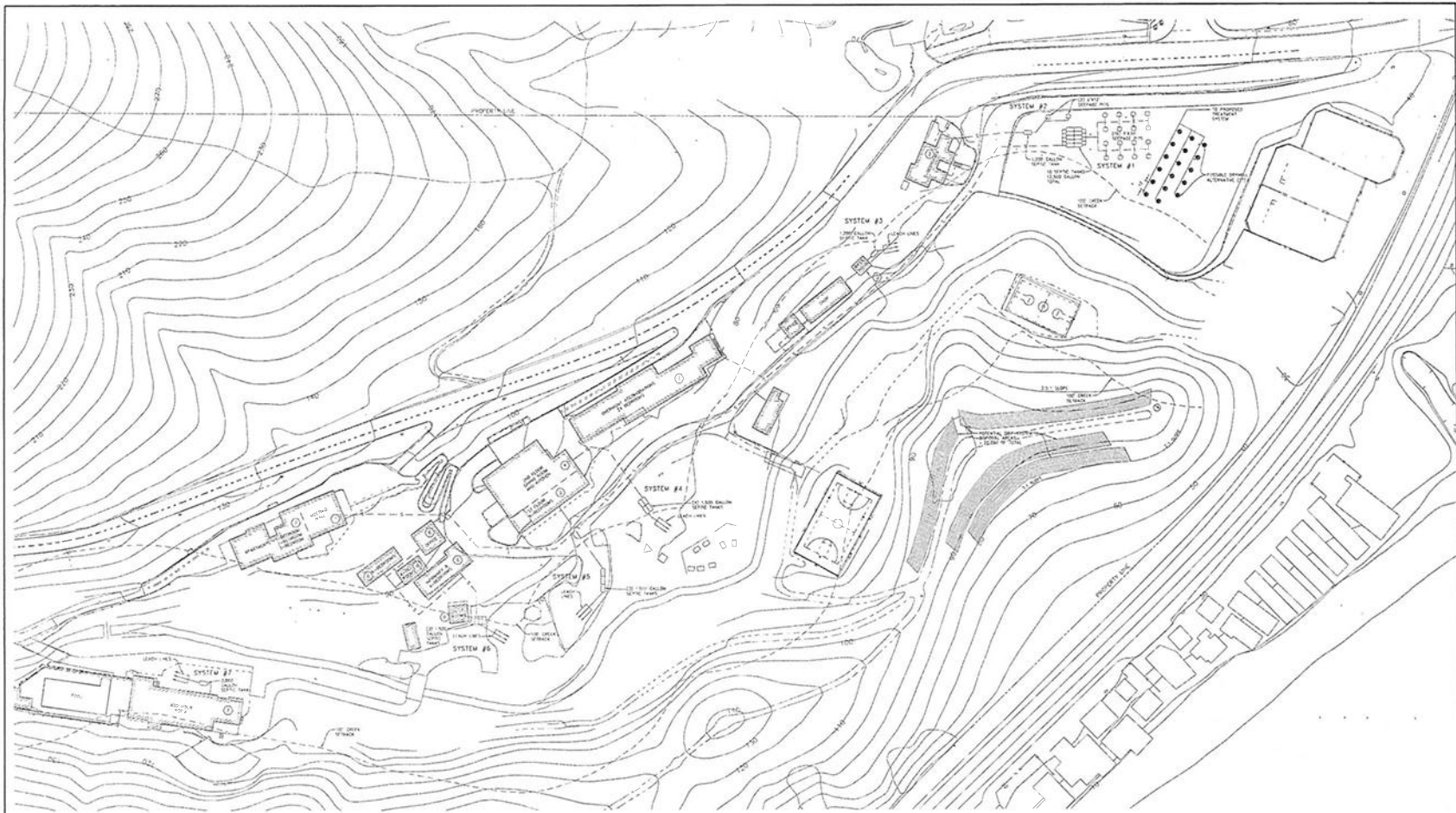
<p>Purfield & Smith Geomatics Surveying Planning Environmental Management 211 De Witt Ave. Suite 200, Carlsbad, CA 92008 Phone: 760-439-9900 Fax: 760-439-9901</p>	<p>FIELD CREW: JMB SURVEY ENGINEER: JMB/MS OFFICE TECH: JMB/MS COMPILED: 01/20/2010</p>	<p>TOPOGRAPHIC MAP / SITE PLAN CAMP HESS KRAMER TITLE SHEET COUNTY OF NORTHERN CALIFORNIA</p>	<p>DATE: 01/20/2010 SHEET: 1 of 8 DRAWN BY: JMB</p>
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PROJECT: TREATMENT SYSTEM LAYOUT	DATE: 10/15/2010	SCALE: 1" = 100'	PROJECT NO: 10-001
DRAWING NO: 10-001-01	DATE: 10/15/2010	SCALE: 1" = 100'	PROJECT NO: 10-001
DESIGNED BY: J. SMITH	CHECKED BY: M. JONES	DATE: 10/15/2010	SCALE: 1" = 100'
			

LEGEND

	PROPOSED TREATMENT SYSTEM LAYOUT
	EXISTING TREATMENT SYSTEM LAYOUT
	PROPOSED BUILDING FOOTPRINT
	EXISTING BUILDING FOOTPRINT
	PROPOSED PARKING AREA
	EXISTING PARKING AREA
	PROPOSED ROAD
	EXISTING ROAD
	PROPOSED UTILITY LINE
	EXISTING UTILITY LINE





- LEGEND**
- POWER LINE (APPROXIMATE LOCATION)
 - ROAD (APPROXIMATE LOCATION)
 - LEACH LINE/DITCH (AREA (APPROXIMATE LOCATION)
 - WETLAND (APPROXIMATE LOCATION)
 - SEPTIC SYSTEM (APPROXIMATE LOCATION)
 - PROPOSED SEPTIC SYSTEM (AREA (APPROXIMATE LOCATION)
 - PROPOSED TREATMENT SYSTEM (AREA (APPROXIMATE LOCATION)

INDEX MAP
SCALE 1:50,000

NO.	DESCRIPTION	DATE

Parfield & Smith
 Engineering, Surveying, Planning
 Environmental Management
 11200 Grand View, San Diego, CA 92120
 Phone: 619-591-2000 Fax: 619-591-2001

PROJECT NO.: 02-0000
 OWNER COUNTY: SDG
 PROJECT: 02-0000
 COUNTY: SAN DIEGO

PROPOSED TREATMENT SYSTEM LAND USE
 CAMP HESS-KRAUER
 CAMP HESS-KRAUER (CAMP CAMP)
 COUNTY OF SAN DIEGO, CALIFORNIA

DATE	BY
10/20/02	



MITIGATED NEGATIVE DECLARATION (MND) ADDENDUM

CAMP HESS KRAMER COASTAL PLANNED DEVELOPMENT PERMIT CASE NO. PL19-0005

A. BACKGROUND INFORMATION AND PROJECT DESCRIPTION:

1. **Entitlement:** Coastal Planned Development (PD) Permit Case No. PL19-0005
2. **Applicant/Property Owner:** Doug Lynn, Executive Director, Camps and Conference Center, Camp Hess Kramer, Gindling Hilltop Camp, Wilshire Boulevard Temple, 3663 Wilshire Boulevard, Los Angeles, CA 90010
3. **Applicant's Representative:** Ginger Anderson c/o Brownstein Hyatt Farber Schreck, LLP, 1021 Anacapa Street, 2nd Floor, Santa Barbara, CA 93101
4. **Location/Tax Assessor's Parcel Numbers:** The property is addressed at 11495 and 11677 Pacific Coast Highway in the Santa Monica Mountains, in the unincorporated area of Ventura County. The Tax Assessor's parcel numbers (APN) for the parcels that constitute the project site are 700-0-070-450 and 700-0-060-310.
5. **Lot Sizes:** 700-070-450 (55.9 acres) and 700-0-060-310 (43.2 acres)
6. **General Plan Land Use Designation:** Rural and Open Space
7. **Coastal Area Plan Land Use Designation:** Residential Rural 1DU/2AC (Residential Rural, one dwelling unit per two acres) and Open Space
8. **Zoning Designation:** CRE-20 ac/M (Coastal Rural Exclusive, 20 acre minimum parcel size, Santa Monica Mountains overlay zone) and COS-10ac-sdf/M (Coastal Open Space, 10 acres minimum parcel size, slope density formula, Santa Monica Mountains overlay zone)
9. **Responsible and/or Trustee Agencies:** California Department of Fish and Wildlife (CDFW), United States Army Corps of Engineers (USACE), California Coastal Commission and Los Angeles Regional Water Quality Control Board (LARWQCB).
10. **Project Description:** Camp Hess Kramer (applicant), requests approval of a Coastal Planned Development (PD) permit (Case No. PL19-0005) to authorize the work completed within Little Sycamore Creek under an Emergency Coastal PD Permit ("Emergency Permit"). Under the Emergency Permit, debris and mud were removed along an estimated 2,572 linear feet of the creek and five check dams, made of rock and rip rap from the creek, were constructed at different points within

the creek to stabilize the bank, and to protect property and ensure public safety. Approximately 14,000 cubic yards of mud and debris was removed from Little Sycamore Creek.

Three temporary water diversions (upstream and downstream sandbag coffer dams) were constructed onsite to ensure emergency work conducted within the creek avoided surface water. The diversions were constructed between April 1 and April 17, 2019, out of sandbags (approximately 3 to 4 feet high) filled with clean sand and wrapped with visqueen plastic to prevent sedimentation into the creek (Exhibit 4 of the June 30, 2022 Planning Director staff report, Figures 3 and 4). All diversions were removed by April 30, 2019. The locations of the water diversions are as follows:

	Upstream Location	Downstream Location
Water Diversion No. 1	Approximately 0.5 miles upstream of Pacific Coast Highway crossing	Approximately 500 feet downstream of the upstream dam
Water Diversion No. 2	Within the creek approximately 10 feet downstream of the Diversion 1	Within the creek approximately 200 feet downstream from the Diversion 1 upstream dam
Water Diversion No. 3	Within the creek approximately 10 feet downstream of the Diversion 1 downstream dam	Within the creek approximately 500 feet downstream from the Diversion 2 upstream dam

To control groundwater seeping and pooling within the work area, water was pumped out and used for dust control on the roads or contained within earthen berms and sandbags within the project area. Following the completion of the project, the three temporary water diversions (upstream and downstream sandbag coffer dams) were removed.

Three temporary stockpile areas and one temporary storage / staging area are located within unvegetated, previously disturbed areas outside of the creek and creek bank (Exhibit 5 of the June 30, 2022 Planning Director staff report). The locations and size of these areas include the following:

Table 2 - Temporary Stockpile, Staging and Storage Areas		
Stockpile Areas		
Location	Approximate Size (Square Feet)	Distance from top of bank of Little Sycamore Creek
North of Bridge No. 1	750	Between 41 and 83 feet
South of Bridge No. 3 and north of Bridge No. 1	2,300	Between 68 and 109 feet
Middle Camp cabin area	4,800	Between 63 and 121 feet
Staging and Storage Area		
South of Bridge No. 1 in Lower Camp	12,700	Between 44 and 144 feet

Fiber rolls were installed around stockpiles to prevent the transport of soils into the creek and construction fencing was placed around the temporary construction staging areas to prevent the discharge of fuel, lubrication, or other materials being stored, as required by the Emergency Permit conditions of approval (Exhibit 3, Condition BIO-5 and Exhibit 8, Condition No. 14 of June 30, 2022 Planning Director staff report). Stockpiled soil is routinely maintained to ensure there is no soil migrates to the creek. Stockpiled soil will be used for additional restoration of the creek under Coastal PD Permit (PL21-0051) that is currently under review.

Impacts to ESHA that are attributed to the Woolsey Fire are considered a natural disaster and not from the operation of Camp Hess Kramer.

All project activities were completed by April 30, 2019.

B. STATEMENT OF ENVIRONMENTAL FINDINGS:

On July 3, 2014, the Planning Commission adopted an MND that evaluated the environmental impacts for a Conditional Use Permit (CUP) Case No. LU10-0069, that approved the continued operation of Camp Hess Kramer for a 20-year period. The CUP authorized campground areas, habitable and non-habitable structures, up to 60 third-party events per year, an advanced Onsite Waste Treatment System (OWTS), and a variance to allow a reduction in the required number of parking spaces. The MND identified potentially significant but mitigatable impacts to biological resources, archaeological resources, and noise and vibration.

On November 8, 2018, the Woolsey Fire ignited and burned 96,949 acres of land in Los Angeles and Ventura Counties. Approximately 85 percent of all the structures on the Camp Hess Kramer property were destroyed. Little Sycamore Creek runs through the camp property before discharging into a culvert beneath Pacific Coast Highway and into the

Pacific Ocean. Following the fire, significant rainstorms in November 2018 and January 2019, sent debris and mud originating from the burn areas into Little Sycamore Creek. Storm drains were obstructed or broken and when the creek was full, water, mud and debris backed up onto the camp property.

Pursuant to Section 8181-3.7 of the Ventura County Coastal Zoning Ordinance (CZO) (Emergency Coastal Development Permits) in the event of an emergency, the Planning Director may issue an emergency permit in accordance with Section 30624 of the Public Resource Code. Development¹ authorized in the emergency permit must be removed unless a complete application for a regular coastal development permit for the development is filed within 90 days of approval of the emergency permit.

On January 31, 2019, the Planning Division approved an Emergency Permit for the removal of debris and mud, and construction of five check dams at different points within Little Sycamore Creek pursuant to Section 8181-3.7 of the Ventura County CZO. The Emergency Permit included 21 conditions. The camp was authorized to allow construction equipment to enter the creek at three temporary access points. Spoil materials removed from the creek were stockpiled onsite. Best management practices (BMPs) (i.e., silt barriers, fiber rolls, sand/gravel bags, straw bale barriers, etc.) were installed to confine the stockpiles and prevent transport of sediment. Temporary construction staging and storage areas were designated a sufficient distance from the creek. The applicant was also required to obtain permits from the United States Army Corps of Engineers (USACE), the California Department of Fish and Wildlife (CDFW) and the Los Angeles Regional Water Quality Control Board (LARWQCB) prior to commencement of the emergency work. On March 28, 2019, pursuant to the camp's Regional General Permit (RGP) No. 63 – Repair and Protection Activities in Emergency Situations, the USACE authorized temporary impacts of approximately 1.45 acres of non-wetland waters of the U.S. within Little Sycamore Creek. USACE placed special construction-related conditions on the Emergency Permit to ensure that archeological resources and water quality were not adversely impacted by the required construction of the check dams and debris removal (USACE RGP No. 63 Letter dated March 28, 2019; Exhibit 3 of the June 30, 2022, Planning Director staff report). On January 24, 2019, the LARWQCB confirmed receipt from USACE of the proposed RGP 63 Emergency Permit (File No. 19-008.). Concurrent with the USACE and LARWQCB notifications, CDFW was also notified. No permit or Operation of Law was issued, however, CDFW did confirm emergencies are recognized as not requiring a permit however, only work to protect life and property is permitted (October 25, 2021 telephone consultation with Sarah Rains, CDFW).

On February 15, 2019, construction activities commenced and were completed on April 30, 2019. On June 20, 2019, an Emergency Project Completion Report ("Completion

¹ Coastal Act Section 30106 defines development to include but not be limited to, grading, removing, dredging, or extraction of any materials, and the removal of major vegetation.

Report”), prepared by Rincon Consultants, was submitted to the Planning Division (Exhibit 4 of the of the June 30, 2022, Planning Director staff report). The Completion Report details the emergency work that was performed and an explanation of how the work complied with the Emergency Permit conditions.

On May 1, 2019, the applicant submitted a Coastal PD application to permit the emergency work completed in April 2019.

Section 15164(b) of the CEQA Guidelines (Title 14, California Code of Regulations, Chapter 3) states that the decision-making body may adopt an addendum to an adopted MND if: (1) only minor technical changes or additions are necessary; and (2) none of the conditions described in Section 15162 of the CEQA Guidelines calling for the preparation of a subsequent Environmental Impact Report (EIR) or negative declaration have occurred.

The conditions described in Section 15162 of the CEQA Guidelines which require the preparation of an EIR or subsequent negative declaration, are provided below, along with a discussion as to why an EIR or subsequent negative declaration is not required:

- 1. Substantial changes are proposed in the project which will require major revisions of the previous MND due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects [§ 15162(a)(1)].**

No substantial changes are proposed for the CUP governing the Camp Hess Kramer Project (Case No. LU10-0069) which will require revisions to the previous MND prepared for that project.

On July 3, 2014, the Ventura County Planning Commission approved the applicant’s request for a CUP (Case No. LU10-0069) for the continued operation of Camp Hess Kramer and Gindling Hilltop Camp and the construction of an OWTS. The Planning Commission also adopted an MND prepared for Case No. LU10-0069. Biological Mitigation Measures 1 and 2 required protection of nesting birds and monarch roosting sites. Given the proximity of the OWTS to Little Sycamore Creek, Biological Resources Mitigation Measure 3 required the applicant to retain a County-approved biologist to monitor construction activities. The mitigation measures assigned to Case No. LU10-0069, together with the Emergency Permit conditions, minimized impacts to environmentally sensitive habitat areas (ESHA). These mitigation measures are included in the conditions of approval for the subject Coastal PD Permit (Exhibit 8, Condition Nos. 24 through 27).

An Initial Study Biological Assessment (ISBA) dated July 22, 2011, prepared by Rincon Consultants, including historical photos of the camp, indicated California sycamore understory was the designated ESHA that was affected by the fire. (Exhibit 9 of the June 30, 2022 Planning Director staff report). Impacts to ESHA

that are attributed to the Woolsey Fire are considered a natural disaster and not from the operation of Camp Hess Kramer. Therefore, areas disturbed to remove debris and mud from the creek will be restored on their own accord.

Additionally, Archaeological Mitigation Measure 4, required all earth disturbance to be monitored by a Registered Professional Archaeologist (RPA) and Native American. These mitigation measures were implemented during the emergency work (Exhibit 8, Condition No. 27 of the June 30, 2022, Planning Director staff report). The emergency work did not require major revisions to the MND due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

2. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous MND due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects [§ 15162(a)(2)].

The existing baseline conditions that were used to analyze potential impacts to the environment have changed. Approximately 85 percent of all the structures on the camp property were destroyed by the 2018 Woolsey Fire. Debris and mud originating from the burn areas and subsequent rainstorms saturated the ground, causing mud, sediment, and debris to fill the creek and flow onto camp property. On April 30, 2019, the removal of debris and mud and the construction of five check dams to stabilize the creek bank was completed under an Emergency Permit (Exhibit 3 of the June 30, 2022, Planning Director staff report).

As described in the Completion Report (Exhibit 4 of the June 30, 2022, Planning Director staff report), prepared by Rincon Consultants, biologists visited the site 18 times while emergency work was being conducted to ensure compliance with the permit's biological mitigation measures.

Biological Resources Mitigation Measures 1, 2, and 3 and Archaeological Mitigation Measure 4 from the adopted MND were enforced. The applicant was also required to comply with the conditions of approval included in the Emergency Permit and any new conditions assigned by Federal and State Agencies (Exhibit 8, Condition Nos. 24 through 27 of the June 30, 2022, Planning Director staff report).

Based on the discussion above, the proposed project would not result in any new potentially significant impacts that were not previously analyzed in the MND or Emergency Permit that was issued following the Woolsey Fire.

- 3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Planning Director adopted the previous MND, shows any of the following:**
- a. The project will have one or more significant effects not discussed in the previous MND [§ 15162(a)(3)(A)].**

The emergency work does not require major revisions of the previous MND, and any significant environmental impacts associated with this project have been addressed with the Biological and Archaeological Mitigation Measures included in the adopted MND prepared for the Camp Hess Kramer CUP, the Emergency Permit conditions, and conditions assigned by the Federal and State Agencies having jurisdiction over the project (Exhibit 8, Condition Nos. 25 through 28 of the June 30, 2022, Planning Director staff report).


Temporary stockpile areas will remain in previously disturbed areas outside of Little Sycamore Creek. The emergency work was completed in April 2019 as documented in the Completion Report prepared by Rincon Consultants (Exhibit 4 of the June 30, 2022, Planning Director staff report). As such, no new significant effects have been identified. The proposed project will not change the analysis set forth in the previous MND. There are no environmental resources, hazards, or public facilities located on, or in the vicinity of, the project site that were previously unknown and could be substantially affected by the proposed project. No new information of substantial importance was discovered that will result in any new environmental effects compared with those analyzed in the adopted MND.

Therefore, based on the information provided above, there is no substantial evidence to warrant the preparation of a subsequent MND. The decision-making body shall consider this addendum to the adopted MND prior to making a decision on the project.

C. PUBLIC REVIEW:

Pursuant to the CEQA Guidelines Section 15164(c), this addendum to the MND does not need to be circulated for public review, and shall be included in, or attached to, the adopted MND.

Prepared by:



Kristina Boero, Senior Planner
Residential Permits Section
Ventura County Planning Division

Reviewed by:



Jennifer Trunk, Manager
Residential Permits Section
Ventura County Planning Division

Exhibit 7 - General Plan Consistency Analysis

CAMP HESS KRAMER COASTAL PLANNED DEVELOPMENT (PD) PERMIT CASE NO. PL19-0005

The 2040 Ventura County General Plan *Goals, Policies and Programs* (2020, page 1-1) states:

All area plans, specific plans subdivision, public works projects, and zoning decisions must be consistent with the direction provided in the County's General Plan.

Finally, the Ventura County CZO (Section 8181-3.5.a) states that in order to be approved, a project must be found consistent with all applicable policies of the Ventura County General Plan and Ventura County Coastal Area Plan.

This exhibit provides an evaluation of the consistency of the proposed project with applicable policies of the Ventura County General Plan and Coastal Area Plan.

- 1. Coastal Area Plan South Coast Area Policy 4.4.1(1):** *All zoning and development shall be in conformance with the Land Use Plan map (Figure 3-6), which has been designed to reflect these goals and policies. The Zoning Compatibility Matrix (Figure 3-1) indicates the zones which are consistent with the various land use categories.*

The zoning designations for the Camp property are CRE-20 ac and COS-10 ac/sdf. The property is also covered by the Santa Monica Mountains Overlay zone. The zoning for the emergency work that was performed is designated CRE-20 ac.

Pursuant to the Ventura County Coastal Zoning Ordinance Section 8181-3.7, Emergency Coastal Development Permits, in the event of an emergency, the Planning Director may issue an emergency permit in accordance with Section 30624 of the Public Resource Code. Development authorized in the emergency permit must be removed unless a complete application for a regular coastal development permit for the development is filed within 90 days of approval of the emergency permit is approved. On January 31, 2019, the Planning Division approved an Emergency Permit (Exhibit 3 of the June 30, 2022, Planning Director staff report) for the removal of debris and mud and construction of five check dams after Little Sycamore Creek was inundated with mud and debris following the Woolsey Fire and subsequent rainstorms.

On February 15, 2019, construction activities commenced and were completed on April 30, 2019.

County of Ventura
Planning Director Hearing
PL19-0005
Exhibit 7 – General Plan Consistency Analysis

On May 1, 2019, the applicant submitted a Coastal PD application to permit the emergency work completed in April 2019.

On June 20, 2019, an Emergency Project Completion Report (“Completion Report”), prepared by Rincon Consultants, was submitted to the Planning Division (Exhibit 4 of the June 30, 2022, Planning Director staff report). The Completion Report details the emergency work that was performed and an explanation of how the work complied with the Emergency Permit conditions.

Based on the discussion above, the project is consistent with Coastal Area Plan South Coast Policy 4.4.1(1).

2. **Land Use and Community Character Element Community Character and Quality of Life Policy LU-16.1:** *The County shall encourage discretionary development to be designed to maintain the distinctive character of the unincorporated communities, to ensure adequate provision of public facilities and services, and to be compatible with neighboring uses.*

Land Use and Community Character Element Visual Access for Rural Development Policy LU-16.10: *The County shall encourage discretionary development in rural areas to maintain mountain views of hillsides, beaches, forests, creeks, and other distinctive natural areas through building orientation, height, and bulk.*

Land Use and Community Character Element Consultation with State and Federal Agencies Policy LU-19.4: *The County shall continue to consult with applicable state and federal regulatory agencies during project review and permitting activities.*

Conservation and Open Space Element Agency Consultation Regarding Biological Resources Policy COS-1.9: *The County shall consult with the California Department of Fish and Wildlife, the Regional Water Quality Control Board (LARWQCB), the U.S. Fish and Wildlife Service, National Audubon Society, California Native Plant Society, National Park Service for development in the Santa Monica Mountains or Oak Park Area, and other resource management agencies, as applicable during the review of discretionary development applications to ensure that impacts to biological resources, including rare, threatened, or endangered species, are avoided or minimized.*

Parcels that contain undeveloped, open space and ESHA are located to the north, west and south of the project site. Privately-owned low-density residential development (1-acre properties and larger), known as the Crown Pointe Estates, are located to the east of the project site. Neptune’s Net restaurant is also located approximately 1,145 feet southeast of the camp property. The surrounding area to

the south of Pacific Coast Highway is developed with higher density residential development along the beachfront.

Little Sycamore Creek originates north of Camp Hess Kramer and ends at a culvert beneath State Route (SR) 1. The camp's street frontages (SR 1 and Yerba Buena Road) are vegetated and developed with tennis courts and court fencing and buildings that were not destroyed in the Woolsey Fire. The emergency work completed in April 2019 occurred along 2,572 linear feet of Little Sycamore Creek and removed mud and debris in the creek. Stockpiles of the mud and debris are located on the interior portions of the site and cannot be seen from SR 1 or Yerba Buena Road.

On March 28, 2019, pursuant to the camp's Regional General Permit (RGP) No. 63 – Repair and Protection Activities in Emergency Situations, the United States Army Corps of Engineers (USACE) authorized temporary impacts of approximately 1.45 acres of non-wetland waters of the U.S. within Little Sycamore Creek (Exhibit 3 of the June 30, 2022, Planning Director staff report). USACE placed special construction-related conditions on the Emergency Permit to ensure that archeological resources and water quality were not adversely impacted by the required construction of the check dams and debris removal (Exhibit 3 of the June 30, 2022, Planning Director staff report). On January 24, 2019, the Los Angeles Regional Water Quality Control Board (LARWQCB) confirmed receipt from USACE of the proposed RGP 63 Emergency Permit (File No. 19-008.). Concurrent with the USACE and LARWQCB notifications, California Department of Fish and Wildlife (CDFW) was also notified. No permit or Operation of Law was issued, however, CDFW did confirm emergencies are recognized as not requiring a permit however, only work to protect life and property is permitted (October 25, 2021, telephone consultation with Sarah Rains, CDFW).

No work was conducted during the rainy season. Consulting biologists monitored all emergency work done in the creek, as required by Condition No. 24 of the project conditions of approval (Exhibit 8 of the June 30, 2022, Planning Director staff report) and noted that the water diversion activities did not result in degradation of the creek or exceed water quality objectives for the creek.

Water quality sampling was collected prior to all diversion activities and following removal of the third diversion. The Completion report includes the water sampling data and concludes that dissolved oxygen concentrations, the pH level, nephelometric turbidity (opaqueness of a fluid due to the presence of suspended solids¹), and water temperature of the Little Sycamore Creek were in compliance

¹ <https://www.sciencedirect.com/topics/engineering/nephelometric-turbidity-unit>

with the Los Angeles Region Basin Plan Water Quality Objectives (Exhibit 4 of the June 30, 2022, Planning Director staff report, Tables 1 through 5).

On June 20, 2022, the Planning Division notified and requested comments from USACE, CDFW, LARWQCB, the U.S. Fish and Wildlife Service, National Audubon Society, California Native Plant Society, and National Park Service regarding the proposed project. As of the date of this staff report, the Planning Division has not received any comments from these agencies.

Based on the discussion above, the project is consistent with General Plan Land Use and Community Character Policies LU-16.1, LU-16.10, LU-19.4, and General Plan Policy COS-1.9.

- 3. Circulation, Transportation, and Mobility Element Vehicle Miles Traveled [VMT] Standards and CEQA Evaluation Policy CTM-1.1:** *The County shall require evaluation of County General Plan land use designation changes, zone changes, and discretionary development for their individual (i.e., project-specific) and cumulative transportation impacts based on Vehicle Miles Traveled (VMT) under the California Environmental Quality Act (CEQA) pursuant to the methodology and thresholds of significance criteria set forth in the County Initial Study Assessment Guidelines.*

Circulation, Transportation, and Mobility Element County Level of Service (LOS) Standards Policy CTM-1.3: *The County shall maintain LOS standards for use as part of the County's transportation planning including the traffic impact mitigation fee program, and the County's review and consideration of proposed land use legislation and discretionary development. For purposes of County transportation planning and review and consideration of proposed land use legislation and discretionary development, the County shall use the following minimum acceptable Level of Service (LOS) for road segment and intersection design standards within the Regional Road Network and all other County-maintained roadways:*

- a. *LOS-'C' for all Federal functional classification of Minor Collector (MNC) and Local roadways (L); and*
- b. *LOS-'D' for all Federal functional classifications except MNC and L, and Federal and State highways in the unincorporated area, except as otherwise provided in subparagraph (c and d);*
- c. *LOS-'E' for State Route 33 between the northerly end of the Ojai Freeway and the city of Ojai, Santa Rosa Road, Moorpark Road north of Santa Rosa Road, State Route 34 north of the city of Camarillo, and State Route 118 between Santa Clara Avenue and the city of Moorpark;*
- d. *LOS 'F' for Wendy Drive between Borchard Drive to Lois Avenue; and*

- e. *The LOS prescribed by the applicable city for all federal highways, state highways, city thoroughfares and city-maintained local roads located within that city, if the city has formally adopted and is implementing a General Plan policy, ordinance, or a reciprocal agreement with the County regarding development in the city that is intended to improve the LOS of County-maintained local roads and federal and state highways located within the unincorporated area of the county.*
- f. *At any intersection between two or more roads, each of which has a prescribed minimum acceptable LOS, the lower LOS of the roads shall be the minimum acceptable LOS for that intersection.*

Circulation, Transportation, and Mobility Element Pro Rata Share of Improvements Policy CTM-1.7: *The County shall require discretionary development that would generate additional traffic pays its pro rata share of the cost of added vehicle trips and the costs of necessary improvements to the Regional Road Network pursuant to the County's Traffic Impact Mitigation Fee Ordinance.*

Circulation, Transportation, and Mobility Element County Road Access Policy CTM-2.3: *The County shall require discretionary development with access onto a County road to have the access point(s) designed and built to County standards.*

Circulation, Transportation, and Mobility Element Emergency Access CTM-2.28: *The County shall ensure that all new discretionary projects are fully evaluated for potential impacts to emergency access. Mitigation of these impacts shall be handled on a project-by project basis to guarantee continued emergency service operations and service levels.*

The Public Works Agency Roads and Transportation Department (PWARTD) reviewed the proposed project and determined that a Traffic Impact Mitigation Fee was not required for the proposed project, as the emergency work did not last longer than 12 months and did not create any additional average daily trips (ADT) on County roads that could be quantified to require the impact fee and establish ADT for the project.

For consistency with Ventura County's General Plan policies, an LOS analysis was conducted. The PWARTD determined that the emergency work did not alter the existing LOS on Yerba Buena Road.

Roads in the Santa Monica Mountains area are rural in nature with widths, grades, and other road features that are considered substandard if such roads were designed and built today. These roads do not create a substantial risk of injury when such roads are used with due care in a way it is reasonably foreseeable that they will be used. Access to Camp Hess Kramer is via Yerba Buena Road. The entry is

less than 500 feet from the intersection of SR 1 and Yerba Buena Road. Therefore, Yerba Buena Road supported the minimal traffic associated with the emergency work and restoration, because excavated soil was not hauled offsite and instead will be used for additional restoration of the creek under Coastal PD Permit (PL21-0051).

The emergency work did not interrupt continued emergency services, or significantly degrade service levels within the Santa Monica Mountains community. Ventura County Fire Protection District Fire Station No. 56, located at 11855 Pacific Coast Highway in Malibu, is approximately 3,684 feet southeast of the project site.

Based on the discussion above, the project is consistent with General Plan Policies CTM-1.1, CTM-1.3, CTM-1.7, CTM-2.3, and CTM-2.28.

4. **Public Facilities, Services, and Infrastructure Element Waste Reduction Practices for Discretionary Development Policy PFS-5.9:** *The County shall encourage applicants for discretionary development to employ practices that reduce the quantities of wastes generated and engage in recycling activities to further reduce the volume of waste disposed of in landfills.*

Removal of mud and debris from Little Sycamore Creek was completed in April 2019. The Completion Report (Exhibit 4 of the June 30, 2022, Planning Director staff report) notes that silt and pollutants were not discharged off the site or within the creek during mud and debris removal activities. Fiber rolls and visqueen plastic were used to contain the materials in the stockpile areas from entering the creek. The applicant collected and disposed of trash in containers that were removed from the site daily during the emergency work cleanup. After project completion, all vehicles, building materials and trash were removed from the site, in compliance with the project conditions (Exhibit 8, Condition No. 19 of the June 30, 2022 Planning Director staff report).

Based on the discussion above, the proposed project is consistent with General Plan Policy PFS-5.9.

5. **Public Facilities, Services, and Infrastructure Element Flood Control and Drainage Facilities Required for Discretionary Development Policy PFS-6.1:** *The County shall require discretionary development to provide flood control and drainage facilities, as deemed necessary by the County Public Works Agency and Watershed Protection District. The County shall also require discretionary development to fund improvements to existing flood control facilities necessitated by or required by the development.*

Public Facilities, Services, and Infrastructure Element Stormwater Drainage Facilities Policy PFS-6.5: *The County shall require that stormwater drainage*

facilities are properly designed, sited, constructed, and maintained to efficiently capture and convey runoff for flood protection and groundwater recharge.

Hazards and Safety Element Slope Drainage Policy HAZ-4.12: *Drainage plans that direct runoff and drainage away from slopes shall be required for construction in hillside areas.*

California Coastal Act Policy Section 30236: *Channelizations, dams, or other substantial alterations of rivers and streams shall incorporate the best mitigation measures feasible, and be limited to (1) necessary water supply projects, (2) flood control projects where no other method for protecting existing structures in the flood plain is feasible and where such protection is necessary for public safety or to protect existing development, or (3) developments where the primary function is the improvement of fish and wildlife habitat.”*

Little Sycamore Creek is a red line channel under the jurisdiction of the Ventura County Watershed Protection District. The emergency work removed mud and debris to reestablish the flow of water through this watershed.

To ensure that stormwater offset designs (i.e., silt barriers, fiber rolls, sand/gravel bags, straw bale barriers, etc.) complied with the LARWQCB National Pollutant Discharge Elimination System (NPDES) Municipal Stormwater Permit No. CAS004002 (Permit), the applicant implemented construction Best Management Practices (BMP) during all ground disturbing activities (Exhibit 8, Condition Nos. 17 and 31 of the June 30, 2022, Planning Director staff report).

The applicant filed Watercourse Permit No. 2019-010 for Project 608C997 with the Ventura County Watershed Protection District to address temporary impacts to Little Sycamore Creek that resulted from the mud and debris removal under the emergency permit. The Watercourse Permit will be amended to include engineered construction plans and hydraulic modeling that depict existing and proposed drainage trends, proposed improvements, storage volume and peak flood discharge will be required for review and approval of the permit. (Exhibit 8, Condition No. 30 of the June 30, 2022 Planning Director staff report).

Based on the discussion above, the project is consistent with General Plan Policies PFS-6.1, PFS-6.5, and HAZ-4.12 and Coastal Act Policy Section 30236.

- 6. Public Facilities, Services, and Infrastructure Element Emergency Vehicles Access Policy PFS-11.4:** *The County shall require all discretionary development to provide, and existing development to maintain, adequate access for emergency vehicles, including two points of access for subdivisions and multifamily developments.*

Public Facilities, Services, and Infrastructure Element Adequate Water Supply, Access, and Response Times for Firefighting Purposes Policy PFS-12.3: *The County shall prohibit discretionary development in areas that lack and cannot provide adequate water supplies, access, and response times for firefighting purposes. (RDR)*

Public Facilities, Services, and Infrastructure Element Consistent Fire Protection Standards for New Development Policy PFS-12.4: *The County, in coordination with local water agencies and the Fire Protection District, shall require new discretionary development to comply with applicable standards for fire flows and fire protection.*

Hazards and Safety Element Fire Prevention Design and Practices Policy HAZ-1.1: *The County shall continue to require development to incorporate design measures that enhance fire protection in areas of high fire risk. This shall include but is not limited to incorporation of fire-resistant structural design, use of fire-resistant landscaping, and fuel modification around the perimeter of structures.*

Hazards and Safety Element Development in High Fire Hazard Severity Zones and Hazardous Fire Areas Policy HAZ-1.4: *The County shall require the recordation of a Notice of Fire Hazard with the County Recorder for all new discretionary entitlements (including subdivisions and land use permits) within areas designated as Hazardous Fire Areas by the Ventura County Fire Department or High Fire Hazard Severity Zones by the California Department of Forestry and Fire Protection (CAL FIRE).*

The project site is located within a very high Fire Hazard Severity zone that is under the jurisdiction of the California Department of Forestry and Fire Protection (CAL FIRE). The emergency work restored fire access through the camp.

Emergency fire protection services were adequate as Ventura County Fire Protection District Fire Station No. 56, located at 11855 Pacific Coast Highway in Malibu, is approximately 3,684 feet southeast of the project site.

The Camp property is accessed by two private driveways connected to Yerba Buena Road. The existing roads (e.g., Yerba Buena Road and SR 1) will continue to provide access to camp. These roads did not need to be widened or extended to serve the emergency work.

Based on the discussion above, the project is consistent with General Plan Policies PFS-11.4, PFS-12.3, PFS-12.4, HAZ-1.1, and HAZ-1.4.

- 7. Conservation and Open Space Element Protection of Sensitive Biological Resources Policy COS-1.1:** *The County shall ensure that discretionary*

development that could potentially impact sensitive biological resources be evaluated by a qualified biologist to assess impacts and, if necessary, develop mitigation measures that fully account for the impacted resource. When feasible, mitigation measures should adhere to the following priority: avoid impacts, minimize impacts, and compensate for impacts. If the impacts cannot be reduced to a less than significant level, findings of overriding considerations must be made by the decision-making body.

Conservation and Open Space Element Agency Consultation Regarding Biological Resources Policy COS-1.9: *The County shall consult with the California Department of Fish and Wildlife, the LARWQCB, the U.S. Fish and Wildlife Service, National Audubon Society, California Native Plant Society, National Park Service for development in the Santa Monica Mountains or Oak Park Area, and other resource management agencies, as applicable during the review of discretionary development applications to ensure that impacts to biological resources, including rare, threatened, or endangered species, are avoided or minimized.*

Conservation and Open Space Element Discretionary Development and Landscaping Policy COS-1.12: *The County shall require landscaping associated with discretionary development, or subject to the California Water Efficient Landscape Ordinance (WELO), to be water-efficient and include native, pollinator-friendly plants consistent with WELO guidelines, as applicable. The planting of invasive and watch list plants as inventoried by the California Invasive Plant Council shall be prohibited, unless planted as a commercial agricultural crop or grown as commercial nursery stock.*

Water Resources Water Use Efficiency for Discretionary Development Policy WR-3.2: *The County shall require the use of water conservation techniques for discretionary development, as appropriate. Such techniques include low-flow plumbing fixtures in new construction that meet or exceed the California Plumbing Code, use of graywater or reclaimed water for landscaping, retention of stormwater runoff for direct use and/or groundwater recharge, and landscape water efficiency standards that meet or exceed the standards in the California Model Water Efficiency Landscape Ordinance.*

Coastal Area Plan Policy 1.4.10(2) [ESHA – Creek Corridors]: *All projects on land either in a stream or creek corridor or within 100 feet of such corridor, shall be sited and designed to prevent impacts which would significantly degrade riparian habitats, and shall be compatible with the continuance of such habitats.*

Coastal Area Plan South Coast Santa Monica Mountains Policy 3: *All new upland development shall be sited and designed to avoid adverse impacts on sensitive environmental habitats.*

- *In cases where sensitive environmental habitats are located on a project site where the impacts of development are mitigated consistent with the Plan, the County shall assure that all habitat areas are permanently maintained in open space through an easement or other appropriate means.*
- *When such impacts of development would be unavoidable, the County shall ascertain within the specific project review period whether any public agency or non-profit organization, including the National Park Service, Coastal Conservancy, the Santa Monica Mountains Conservancy, State Department of Parks and Recreation, County Recreation Services, and Trust for Public Lands, is planning or contemplating acquisition of any portion of the subject property to preserve it in open space. The permit may not be approved if such agency or organization has been specifically authorized to acquire any portion of the property which would be affected by the proposed development, and funds for the acquisition are available or could reasonably be expected to be available within one year of the date of application for the permit. If the permit has been denied for such reasons and the property has not been acquired by such agency or organization within a reasonable time, a permit may not be denied again on the same ground.*

Coastal Act Policy Section 30231: *"The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference of ground water flow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams."*

Coastal Act Policy Section 30240:

- a) Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on such resources shall be allowed within such areas.*
- b) Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade such areas and shall be compatible with the continuance of such habitat areas.*

An Initial Study Biological Assessment (ISBA) dated July 22, 2011 (Exhibit 9 of the June 30, 2022 Planning Director staff report), prepared by Rincon Consultants, included historical photos of the camp that indicated California sycamore understory that was affected by the fire was designated as ESHA. Pre-fire native vegetation

observed within the project footprint included California sycamore woodland (*Platanus racemosa*), coyote brush (*Baccharis pilularis*), mulefat (*Baccharis salicifolia*), and poison oak. Impacts to ESHA that are attributed to the Woolsey Fire are considered a natural disaster and not from the operation of Camp Hess Kramer. Therefore, areas disturbed by the removal of debris and mud from the creek was required as part of the emergency permit. As no development is proposed, additional ESHA was not displaced as a result of the emergency work². All trees along the creek bank were left in place for stabilization purposes.

In accordance with Coastal Area Plan South Coast Santa Monica Mountains Policy 3, Conditional Use Permit (CUP) LU10-0069 included Condition of Approval No. 25 requiring the applicant record a deed restriction identifying ESHA. A Notice of Land Use Entitlement and an exhibit identifying ESHA was recorded (Instrument No. 20171004-00129270-0). The emergency work was confined to the creek and did not expand into the restricted ESHA areas.

The MND prepared for Camp Hess Kramer included Biological Resources Mitigation Measures which required avoidance of nesting birds and monarch butterfly roosts. The applicant was also required to retain a qualified biologist to oversee construction activities related to the OWTS. Additionally, Archaeological Mitigation Measure 4, required all earth disturbance to be monitored by a Registered Professional Archaeologist (RPA) and Native American. These mitigation measures were implemented during the emergency work. (Exhibit 8, Condition Nos. 24 through 27 of the June 30, 2022, Planning Director staff report).

Prior to removing mud and debris from the creek, the applicant was required to obtain permits from the USACE, CDFW and the LARWQCB. As discussed in item 2 above, on March 28, 2019, the USACE authorized temporary impacts of approximately 1.45 acres of non-wetland waters of the U.S. within Little Sycamore Creek. USACE placed special construction-related conditions on the Emergency Permit to ensure that archeological resources and water quality were not adversely impacted by the required construction of the check dams and debris removal. CDFW and LARWQCB were also notified.

The emergency work involved the removal of approximately 14,000 cubic yards of mud and debris from the creek (Exhibit 4, Table 1 of the June 30, 2022, Planning Director staff report). Four stockpile areas are between 41 and 121 feet from the top of bank of Little Sycamore Creek (Exhibits 4 and 8 of the June 30, 2022 Planning Director staff report). The stockpile and staging locations were selected because they were previously disturbed areas, did not have vegetation, were flat/level, and outside of the creek and creek bank. The existing stockpile, storage and staging

² Additional work that may be required to stabilize the creek will be evaluated as part of the camp rebuild project (Case No. PL21-0051), including restoration of creek banks and adjoining upland areas.

areas equate to 20,550 sq. ft. of already disturbed area (Exhibit 4, table on page 10 of the June 30, 2022, Planning Director staff report). The applicant intends to use this fill dirt for additional creek restoration required under the camp rebuild project (Case No. PL21-0051). Relocating the mud/soil to Gindling Hilltop Camp or another offsite location would result in approximately 1,400 truck trips. When the camp is rebuilt, the same number of truck trips would have to be replicated. Therefore stockpiled mud/soil remained onsite. BMPs (i.e., silt barriers, fiber rolls, sand/gravel bags, straw bale barriers, etc.) were installed to confine the stockpiles and prevent transport of sediment. Fueling, lubrication, maintenance, storage and staging of vehicles and equipment did not result in a discharge into the creek (Exhibit 4, Section 4.1, pg. 14 of the June 30, 2022, Planning Director staff report).

As previously noted, (above), the applicant obtained permit authorization from USACE, LARWQCB and CDFW for the initial mud and debris removal. Additionally, on June 20, 2022, the Planning Division notified and requested comments from USACE, CDFW, the LARWQCB, the U.S. Fish and Wildlife Service, National Audubon Society, California Native Plant Society, and National Park Service regarding the proposed project. As of the date of this staff report, the Planning Division has not received any written comments from these agencies.

Based on the discussion above, the project is consistent with General Plan Policy COS-1.1, COS-1.9, COS-1.12, and WR-3.2, Coastal Act Policy Sections 30231 and 30240, and Coastal Area Plan South Coast Santa Monica Mountains Policies 3 and 1.4.10(2).

- 8. Conservation and Open Space Element Discretionary Development on Hillside and Slopes Policy COS-1.6:** *The County shall require discretionary development on hillsides and slopes, which have an average natural slope of 20 percent or greater in the area where the proposed development would occur, to be sited and designed in a manner that will minimize grading, alteration of natural land forms, and vegetation removal to avoid significant impacts to sensitive biological resources to the extent feasible.*

The camp property ranges from approximately 60 feet to 160 feet above mean sea level. Developed portions of the camp property are primarily flat. Little Sycamore Creek cuts through Lower and Middle Camps, the creek banks range from 20 percent to 120 percent (past vertical). The emergency work was completed in April 2019 to remove mud and debris from the creek. The proposed Coastal PD Permit authorizes that work was the “minimum amount necessary” to alleviate the immediate threat.

Based on the discussion above, the proposed project is consistent with General Plan Policy COS-1.6.

9. **Conservation and Open Space Element Scenic Roadways Policy COS-3.1:** *The County shall protect the visual character of scenic resources visible from state or County designated scenic roadways.*

Coastal Area Plan South Coast Santa Monica Mountains Policy 4.4.10(f)(7): *New development shall be sited and designed to protect public views to and from the shoreline and public recreational areas. Where feasible, development on sloped terrain shall be set below road grade.*

Coastal Area Plan South Coast Santa Monica Mountains Policy 4.4.10(f)(8): *Development shall not be sited on ridgelines or hilltops when alternative sites on the parcel are available and shall not be sited on the crest of major ridgelines.*

Coastal Act Policy Section 30251: *The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of the surrounding area and, where feasible, to restore and enhance visual quality in visually degraded areas. New development in highly scenic areas such as those designated in the California Coastline Preservation and Recreation Plan prepared by the Department of Parks and Recreation and by local government shall be subordinate to the character of its setting.*

The Camp property abuts SR 1, an eligible scenic highway, to the north and Yerba Buena Road to the east. The project site does not include any property within the Scenic Resource Protection (SRP) Overlay Zone. Little Sycamore Creek meanders through Lower and Middle Camp before terminating at a culvert beneath SR 1 where it drains to the Pacific Ocean. Neither the creek or the stockpile areas can be seen from SR 1 or Yerba Buena Road. No aspect of the proposed project is located on top of ridgelines or hilltops.

Based on the discussion above, the project is consistent with General Plan Policies COS-3.1, Coastal Act Policy Section 30251 and Coastal Area Plan South Coast Santa Monica Mountains Policies 4.4.10(f)(7) and 4.4.10(f)(8).

10. **Coastal Area Plan South Coast Recreation Policy 8:** *Development shall neither preclude continued use of, or preempt the option of establishing inland recreational trails along identified routes, as indicated in the Santa Monica Mountains Comprehensive Plan (1979), and the Coastal Slope Trail as proposed in the U.S. Department of the Interior's Santa Monica Mountains Draft Environmental Impact Statement and General Management Plan (September 1980), or along routes established by custom to destinations of public recreation significance. An offer-of-*

dedication or a deed restriction of a trail right-of-way shall be required as a condition of approval on property crossed by such trail routes.

Coastal Area Plan South Coast Recreation Policy 12: *Before a permit for development of any shoreline or inland parcel is approved, its suitability for public recreational use shall be evaluated within the specified project review period by the County in consultation with the State Department of Parks and Recreation and the National Park Service. If the County determines that the property may be suitable for such use, the County shall ascertain whether any public agency or non-profit organization, including the National Park Service, Santa Monica Mountains Conservancy, Coastal Conservancy, State Department of Parks and Recreation, County Recreation Services, and Trust for Public Lands, is planning or contemplating acquisition of any part of the subject property, specifically authorized to acquire any portion of the property which would be affected by the proposed development, and funds for the acquisition are available or could reasonably be expected to be available within one year from the date of application or permit. If a permit has been denied for such reasons and the property has not been acquired by such agency or organization within a reasonable time, a permit may not be denied again on the same ground.*

County Line Beach is located approximately 25 feet south of Camp Hess Kramer and is separated by SR 1. Big Sycamore Canyon Trail is located approximately 16,788 feet northwest of the project site, Yellow Hill Trail is located approximately 6,077 feet east of the project site, and the California Coastal Trail is located adjacent to County Line Beach. All emergency work occurred on the camp property and did not impact nearby recreational uses.

On May 6, 2021 and December 1, 2021, the California Coastal Commission requested additional analysis demonstrating the need for the bank stabilization measures, two grade control structures, cut-off trenches, and a storm drain outlet, impacts to ESHA, and the presence of steelhead trout in the creek. The additional bank stabilization measures, two grade control structures, cut-off trenches, and a storm drain outlet are no longer proposed part of the project, therefore, there would not be any additional impacts to the creek, ESHA and the steelhead trout. Staff's response to the Commission letters are included in Exhibit 10 of the June 30, 2022 Planning Director staff report.

On June 20, 2022, the Planning Division notified and requested comments from USACE, CDFW, the LARWQCB, the U.S. Fish and Wildlife Service, National Audubon Society, California Native Plant Society, and National Park Service regarding the proposed project. As of the date of this staff report, the Planning Division has not received any written comments from these agencies.

Based on the discussion above, the proposed project is consistent with Coastal Area Plan South Coast Recreation Policies 8 and 12.

11. **Conservation and Open Space Element Cooperation for Cultural, Historical, Paleontological, and Archaeological Resource Preservation Policy COS-4.2(a):** *The County shall cooperate with cities, special districts, appropriate organizations and private landowners to identify known cultural, archaeological, historical, and paleontological resources to preserve identified resources within the county.*

Conservation and Open Space Element Cooperation for Tribal Cultural Resource Preservation Policy COS-4.2(b): *For discretionary projects, the County shall request local tribes contact information from Native American Heritage Commission, to identify known tribal cultural resources. If requested by one or more of the identified local tribes, the County shall engage in consultation with each local tribe to preserve, and determine appropriate handling of, identified resources within the county.*

Conservation and Open Space Element Discretionary Development and Tribal, Cultural, Historical, Paleontological, and Archaeological Resource Preservation Policy COS-4.4: *The County shall require that all discretionary development projects be assessed for potential tribal, cultural, historical, paleontological, and archaeological resources by a qualified professional and shall be designed to protect existing resources. Whenever possible, significant impacts shall be reduced to a less-than-significant level through the application of mitigation and/or extraction of maximum recoverable data. Priority shall be given to measures that avoid resources.*

Coastal Act Policy Section 30244: *Where development would adversely impact archaeological or paleontological resources as identified by the State Historic Preservation Officer, reasonable mitigation measures shall be required.*

Coastal Area Plan Archaeology Policy 4.1.1(1): *Discretionary development shall be reviewed to identify potential locations for sensitive archaeological resources.*

Coastal Area Plan Archaeology Policy 4.1.1(2): *New development shall be sited and designed to avoid adverse impacts to archaeological resources to the maximum extent feasible. If there is no feasible alternative that can eliminate all impacts to archaeological resources, then the alternative that would result in the fewest or least significant impacts to resources shall be selected. Impacts to archaeological resources that cannot be avoided through siting and design alternatives shall be mitigated. When impacts to archaeological resources cannot be avoided, mitigation shall be required and shall be Last Certified 7-1-2017 Goals. Policies and Programs*

- 4-3 designed in accordance with established federal, state and/or County standards and shall be consistent with the policies and provisions of the LCP.

Coastal Area Plan Archaeology Policy 4.1.1(3):: *Archaeological, historical, and ethnobotanical interpretation of native peoples in Ventura County should be incorporated into existing and future interpretive programs at public recreation areas.*

Coastal Area Plan Archaeology Policy 4.1.1(4): *Location of all coastal zone archaeological sites will be kept confidential to avert disturbance or destruction.*

Coastal Area Plan Archaeology Policy 4.1.1(5): *Native American tribal groups approved by the Native American Heritage Commission for the area shall be consulted when development has the potential to adversely impact archeological resources.*

Coastal Area Plan Archaeology Policy 4.1.1(6): *Protect and preserve archaeological resources from destruction and avoid impacts to such resources where feasible.*

As discussed in the MND (Exhibit 6 of the June 30, 2022, Planning Director staff report), a combination of sedimentary rocks of the Topanga formation and intrusive igneous rocks of the Conejo Volcanics formation (a form of Quaternary alluvium deposits) occur on the camp property. The Topanga formation is assigned a paleontological importance ranking of "Moderate" and the Conejo Volcanics formation is assigned a ranking of "None." As the project site is located in an area of "Quaternary Deposits (alluvium) that are designated "Moderate" or "None," paleontological resources are not expected to occur on site.

In August 2011, a Phase I Archaeological Survey Report was prepared by Applied Earthworks, Inc. in connection with the camp's proposal to construct an onsite wastewater treatment system. The Phase I noted that Little Sycamore Creek, is known to potentially contain archaeological resources. The MND evaluated the environmental impacts for the camp's CUP, Case No. LU10-0069, and included Archaeological Mitigation Measure 4 which required all earth disturbance be monitored by a Registered Professional Archaeologist (RPA) and Native American. This mitigation measure was implemented during the emergency work (Exhibit 8, Condition No. 27 of the June 30, 2022, Planning Director staff report).

Based on the discussion above, the proposed project is consistent with 2040 General Policies COS-4.2(a), COS-4.2(b), COS-4.4, Coastal Act Policy Section 30244, and Coastal Area Plan Policies 4.1.1(1) through 4.1.1(6).

- 12. Hazards and Safety Element Soil Erosion and Pollution Prevention Policy HAZ-4.5:** *The County shall require discretionary development be designed to prevent soil erosion and downstream sedimentation and pollution.*

Hazards and Safety Element Vegetative Resource Protection Policy HAZ-4.6: *The County shall require discretionary development to minimize the removal of vegetation to protect against soil erosion, rockslides, and landslides.*

Hazards and Safety Element Temporary Revegetation on Graded Areas Policy HAZ-4.7: *The County shall require, as necessary, the use of soil stabilization methods on graded areas to reduce the potential for erosion, particularly during the construction phase.*

Water Resources Water Quality Protection for Discretionary Development Policy WR-1.12: *The County shall evaluate the potential for discretionary development to cause deposition and discharge of sediment, debris, waste and other pollutants into surface runoff, drainage systems, surface water bodies, and groundwater. The County shall require discretionary development to minimize potential deposition and discharge through point source controls, storm water treatment, runoff reduction measures, best management practices, and low impact development.*

Water Resources Water Quality Protection for Discretionary Development Policy WR-2.2: *The County shall evaluate the potential for discretionary development to cause deposition and discharge of sediment, debris, waste, and other contaminants into surface runoff, drainage systems, surface water bodies, and groundwater. In addition, the County shall evaluate the potential for discretionary development to limit or otherwise impair later reuse or reclamation of wastewater or stormwater. The County shall require discretionary development to minimize potential deposition and discharge through point source controls, storm water treatment, runoff reduction measures, best management practices, and low impact development.*

Coastal Area Plan South Coast Hazards Policy 4.4.4(3): *All new development will be evaluated for its impacts to, and from, geologic hazards (including seismic safety, landslides, expansive soils, subsidence, etc.), flood hazards, and fire hazards. Feasible mitigation shall be required where necessary.*

Coastal Area Plan South Coast Hazards Policy 4.4.4(8): *A landscaping plan for fire and erosion control will be submitted for any new development located in extreme fire hazard areas as shown in the County's Hazard Appendix Fire Hazard Map. As many native plants are feasible should be used, and information on kinds and sources of these plants are available through the County.*

Little Sycamore Creek meanders through the camp property before discharging into a culvert beneath SR 1 and into the Pacific Ocean.

A portion of the southeast corner of the subject property is located within a 1 percent annual chance floodplain as evidenced on the latest "Effective" Digital Flood Insurance Rate Maps (DFIRMs) issued by the Federal Emergency Management Agency (FEMA) (January 20, 2010) (Panel 1140 of 1275, Map 06111C1140E). Further, this area has been mapped by FEMA as an "Unnumbered/Approximate A Zone" (100-year) floodplain and an "Unshaded X Zone" (beyond the 500-year) floodplain. The emergency work was not located within the identified floodplain.

The stockpile, storage and staging areas are temporary. The applicant intends to use this fill dirt for additional creek restoration under the camp rebuild project. BMPs (i.e., silt barriers, fiber rolls, sand/gravel bags, straw bale barriers, etc.) were installed to confine the stockpiles and prevent transport of sediment. The stockpiles are frequently inspected and if necessary, additional BMPs are added to maintain, restore or replace the BMPs.

To prevent erosion, the applicant removed spoils from the creek and suitable materials free of contaminants, such as trash and debris, and used this material to recontour an eroded slope east of the creek on the camp property. In addition, all trees along the creek bank were left in place for continued stabilization purposes.

Based on the discussion above, the proposed project is consistent with General Plan Policies HAZ-4.5 through HAZ-4.7, WR-1.12, and WR-2.2, and Coastal Area Plan Policies 4.4.4(3) and 4.4.4(8).

EXHIBIT 8 – DRAFT CONDITIONS OF APPROVAL FOR COASTAL PLANNED DEVELOPMENT (PD) PERMIT CASE NO. PL19-0005

CAMP HESS KRAMER EMERGENCY PERMIT

RESOURCE MANAGEMENT AGENCY (RMA)

Planning Division Conditions

1. Project Description

This Coastal PD Permit is based on and limited to compliance with the project description stated in this condition below, Exhibits 3, 4, 5 and 9 of the Planning Director hearing on June 30, 2022, and conditions of approval set forth below. Together, these conditions and documents describe the “Project.” Any deviations from the Project must first be reviewed and approved by the County in order to determine if the Project deviations conform to the Project as approved. Project deviations may require Planning Director approval for changes to the permit or further California Environmental Quality Act (CEQA) environmental review, or both. Any Project deviation that is implemented without requisite County review and approval(s) may constitute a violation of the conditions of this permit and applicable law.

The Project description is as follows:

This Coastal Planned Development (PD) permit is granted to authorize Camp Hess Kramer (applicant), approval of a Coastal Planned Development (PD) permit (Case No. PL19-0005) to authorize the work completed within Little Sycamore Creek under an Emergency Coastal PD Permit (“Emergency Permit”). Under the Emergency Permit, debris and mud were removed along an estimated 2,572 linear feet of the creek and five check dams, made of rock and rip rap from the creek, were constructed at different points within the creek to stabilize the bank, and to protect property and ensure public safety. Approximately 14,000 cubic yards of mud and debris was removed from Little Sycamore Creek.

Three temporary water diversions (upstream and downstream sandbag coffer dams) were constructed onsite to ensure emergency work conducted within the creek avoided surface water. The diversions were constructed between April 1 and April 17, 2019, out of sandbags (approximately 3 to 4 feet high) filled with clean sand and wrapped with visqueen plastic to prevent sedimentation into the creek (Exhibit 4 of the June 30, 2022 Planning Director staff report, Figures 3 and 4). All diversions were removed by April 30, 2019. The locations of the water diversions are as follows:

	Upstream Location	Downstream Location
Water Diversion No. 1	Approximately 0.5 miles upstream of Pacific Coast Highway crossing	Approximately 500 feet downstream of the upstream dam
Water Diversion No. 2	Within the creek approximately 10 feet downstream of the Diversion 1	Within the creek approximately 200 feet downstream from the Diversion 1 upstream dam
Water Diversion No. 3	Within the creek approximately 10 feet downstream of the Diversion 1 downstream dam	Within the creek approximately 500 feet downstream from the Diversion 2 upstream dam

To control groundwater seeping and pooling within the work area, water was pumped out and used for dust control on the roads or contained within earthen berms and sandbags within the project area. Following the completion of the project, the three temporary water diversions (upstream and downstream sandbag coffer dams) were removed.

Three temporary stockpile areas and one temporary storage / staging area are located within unvegetated, previously disturbed areas outside of the creek and creek bank (Exhibit 5 of the June 30, 2022 Planning Director staff report). The locations and size of these areas include the following:

Table 2 - Temporary Stockpile, Staging and Storage Areas		
Stockpile Areas		
Location	Approximate Size (Square Feet)	Distance from top of bank of Little Sycamore Creek
North of Bridge No. 1	750	Between 41 and 83 feet
South of Bridge No. 3 and north of Bridge No. 1	2,300	Between 68 and 109 feet
Middle Camp cabin area	4,800	Between 63 and 121 feet
Staging and Storage Area		
South of Bridge No. 1 in Lower Camp	12,700	Between 44 and 144 feet

Fiber rolls were installed around stockpiles to prevent the transport of soils into the creek and construction fencing was placed around the temporary construction staging areas to prevent the discharge of fuel, lubrication, or other materials being stored, as required by the Emergency Permit conditions of approval. Stockpiled soil is routinely maintained to

ensure there is no soil migrates to the creek. Stockpiled soil will be used for additional restoration of the creek under Coastal PD Permit (PL21-0051) that is currently under review.

Impacts to ESHA that are attributed to the Woolsey Fire are considered a natural disaster and not from the operation of Camp Hess Kramer.

All project activities were completed by April 30, 2019.

The grading, restoration, use and maintenance of the property, the size, shape, arrangement, staging areas, and the protection and preservation of resources shall conform to the project description above and all approved County land use hearing exhibits in support of the Project and conditions of approval below.

2. Site Maintenance

Purpose: To ensure that the Project site is maintained in a neat and orderly manner so as not to create any hazardous conditions or unsightly conditions which are visible from outside of the Project site.

Requirement: The Permittee shall maintain the Project site in a neat and orderly manner, and in compliance with the Project description set forth in Condition No. 1. Only equipment and/or materials which the Planning Director determines to substantially comply with the Project description shall be stored within the Project site during the life of the Project.

Documentation: The Permittee shall maintain the Project site in compliance with Condition No. 1 and the approved plans for the Project.

Timing: The Permittee shall maintain the Project site in a neat and orderly manner and in compliance with Condition No. 1 throughout the life of the Project.

Monitoring and Reporting: The County Public Works Agency Grading Inspector, Fire Marshall, and/or Planning Division staff has the authority to conduct periodic site inspections to ensure the Permittee's ongoing compliance with this condition consistent with the requirements of § 8183-5 of the Ventura County Coastal Zoning Ordinance.

3. Coastal PD Permit Modification

Prior to undertaking any operational or construction-related activity which is not expressly described in these conditions, the Permittee shall first contact the Planning Director to determine if the activity requires a modification of this Coastal PD Permit. The Planning Director may, at the Planning Director's sole discretion, require the Permittee to file a written and/or mapped description of the activity in order to determine if a Coastal PD Permit modification is required. If a Coastal PD Permit modification is required, the modification shall be subject to:

- a. The modification approval standards of the Ventura County Ordinance Code in effect at the time the modification application is acted on by the Planning Director; and,
- b. Environmental review, as required pursuant to the California Environmental Quality Act (CEQA; California Public Resources Code, §§ 21000-21178) and the State CEQA Guidelines (California Code of Regulations, Title 14, Chapter 3, §§ 15000-15387), as amended from time to time.

4. Acceptance of Conditions and Schedule of Enforcement Responses

The Permittee's acceptance of this Coastal PD Permit and/or commencement of construction and/or operations under this Coastal PD Permit shall constitute the Permittee's formal agreement to comply with all conditions of this Coastal PD Permit. Failure to abide by and comply with any condition of this Coastal PD Permit shall constitute grounds for enforcement action provided in the Ventura County Coastal Zoning Ordinance (Article 13), which shall include, but is not limited to, the following:

- a. Public reporting of violations to the Planning Commission and/or Board of Supervisors;
- b. Suspension of the permitted land uses (Condition No. 1);
- c. Modification of the Coastal PD Permit conditions listed herein;
- d. Recordation of a "Notice of Noncompliance" on the deed to the subject property;
- e. The imposition of civil administrative penalties; and/or
- f. Revocation of this Coastal PD Permit.

The Permittee is responsible for being aware of and complying with the Coastal PD Permit conditions and all applicable federal, state, and local laws and regulations.

5. Time Limits

a. Use inauguration:

- (1) The approval decision for this Coastal PD Permit becomes effective upon the expiration of the 10-day appeal period following the approval decision on the Project, or when any appeals of the decision are finally resolved. Once the approval decision becomes effective, the Permittee must obtain a Zoning Clearance for construction in order to initiate the land uses set forth in Condition No. 1.
- (2) This Coastal PD Permit shall expire and become null and void if the Permittee fails to obtain a Zoning Clearance for construction within one year from the date the approval decision of this Coastal PD becomes effective. The Planning Director may grant a one-year extension of time to the Permittee in order to obtain the Zoning Clearance for construction if the Permittee can demonstrate to the satisfaction of the Planning Director that the Permittee has

made a diligent effort to implement the Project, and the Permittee has requested the time extension in writing at least 30 days prior to the one year expiration date.

- (3) Prior to the issuance of the Zoning Clearance for construction, all fees and charges billed to that date by any County agency, as well as any fines, penalties, and sureties, must be paid in full. After issuance of the Zoning Clearance for construction, any final billed processing fees must be paid within 30 days of the billing date or the County may revoke this Coastal PD Permit.

6. Notice of Coastal PD Permit Requirements and Retention of Coastal PD Permit Conditions On Site

Purpose: To ensure full and proper notice of these Coastal PD Permit conditions affecting the use of the subject property.

Requirement: Unless otherwise required by the Planning Director, the Permittee shall notify, in writing, the Property Owner(s) of record, contractors, and all other parties and vendors who regularly conduct activities associated with the Project, of the pertinent conditions of this Coastal PD Permit.

Documentation: The Permittee shall present to the Planning Division staff copies of the conditions, upon Planning Division staff's request.

Timing: Prior to issuance of a Zoning Clearance for construction and throughout the life of the Project.

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

7. Financial Responsibility for Compliance Monitoring and Enforcement

- a. Cost Responsibilities: The Permittee shall bear the full costs of all County staff time, materials, and County-retained consultants associated with condition compliance review and monitoring, CEQA mitigation monitoring, other permit monitoring programs, and enforcement activities, actions, and processes conducted pursuant to the Ventura County Coastal Zoning Ordinance (§ 8183-5) related to this Coastal PD Permit. Such condition compliance review, monitoring and enforcement activities may include (but are not limited to): periodic site inspections; preparation, review, and approval of studies and reports; review of permit conditions and related records; enforcement hearings and processes; drafting and implementing compliance agreements; and attending to the modification, suspension, or revocation of permits. Costs will be

billed at the rates set forth in the Planning Division or other applicable County Fee Schedule, and at the contract rates of County-retained consultants, in effect at the time the costs are incurred.

8. Defense and Indemnification

- a. The Permittee shall defend, at the Permittee's sole expense with legal counsel acceptable to the County, against any and all claims, actions, or proceedings against the County, any other public agency with a governing body consisting of the members of the County Board of Supervisors, or any of their respective board members, officials, employees and agents (collectively, "Indemnified Parties") arising out of or in any way related to the County's issuance, administration, or enforcement of this Coastal PD Permit. The County shall promptly notify the Permittee of any such claim, action or proceeding and shall cooperate fully in the defense.
- b. The Permittee shall also indemnify and hold harmless the Indemnified Parties from and against any and all losses, damages, awards, fines, expenses, penalties, judgments, settlements, or liabilities of whatever nature, including but not limited to court costs and attorney fees (collectively, "Liabilities"), arising out of or in any way related to any claim, action or proceeding subject to subpart (a) above, regardless of how a court apportions any such Liabilities as between the Permittee, the County, and/or third parties.
- c. Except with respect to claims, actions, proceedings, and Liabilities resulting from an Indemnified Party's sole active negligence or intentional misconduct, the Permittee shall also indemnify, defend (at Permittee's sole expense with legal counsel acceptable to County), and hold harmless the Indemnified Parties from and against any and all claims, actions, proceedings, and Liabilities arising out of, or in any way related to, the construction, maintenance, land use, or operations conducted pursuant to this Coastal PD Permit, regardless of how a court apportions any such Liabilities as between the Permittee, the County, and/or third parties. The County shall promptly notify the Permittee of any such claim, action, or proceeding and shall cooperate fully in the defense.
- d. Neither the issuance of this Coastal PD Permit, nor compliance with the conditions hereof, shall relieve the Permittee from any responsibility otherwise imposed by law for damage to persons or property; nor shall the issuance of this Coastal PD Permit serve to impose any liability upon the Indemnified Parties for injury or damage to persons or property.

9. Invalidation of Condition(s)

If any of the conditions or limitations of this Coastal PD Permit are held to be invalid in whole or in part by a court of competent jurisdiction, that holding shall not invalidate any

of the remaining Coastal PD Permit conditions or limitations. In the event that any condition imposing a fee, exaction, dedication, or other mitigation measure is challenged by the Permittee in an action filed in a court of competent jurisdiction, or threatened to be filed therein, the Permittee shall be required to fully comply with this Coastal PD Permit, including without limitation, by remitting the fee, exaction, dedication, and/or by otherwise performing all mitigation measures being challenged. This Coastal PD Permit shall continue in full force unless, until, and only to the extent invalidated by a final, binding judgment issued in such action.

If a court of competent jurisdiction invalidates any condition in whole or in part, and the invalidation would change the findings and/or the mitigation measures associated with the approval of this Coastal PD Permit, at the discretion of the Planning Director, the Planning Director may review the project and impose substitute feasible conditions/mitigation measures to adequately address the subject matter of the invalidated condition. The Planning Director shall make the determination of adequacy. If the Planning Director cannot identify substitute feasible conditions/mitigation measures to replace the invalidated condition and cannot identify overriding considerations for the significant impacts that are not mitigated to a level of insignificance as a result of the invalidation of the condition, then this Coastal PD Permit may be revoked.

10. Consultant Review of Information and Consultant Work

The County and all other County permitting agencies for the Project have the option of referring any and all special studies that these conditions require to an independent and qualified consultant for review and evaluation of issues beyond the expertise or resources of County staff.

Prior to the County engaging any independent consultants or contractors pursuant to the conditions of this Coastal PD Permit, the County shall confer in writing with the Permittee regarding the necessary work to be contracted, as well as the estimated costs of such work. Whenever feasible, the County will use the lowest responsible bidder or proposer. Any decisions made by County staff in reliance on consultant or contractor work may be appealed pursuant to the appeal procedures contained in the Ventura County Zoning Ordinance Code then in effect.

The Permittee may hire private consultants to conduct work required by the County, but only if the consultant and the consultant's proposed scope-of-work are first reviewed and approved by the County. The County retains the right to hire its own consultants to evaluate any work that the Permittee or a contractor of the Permittee undertakes. In accordance with Condition No. 11, if the County hires a consultant to review any work undertaken by the Permittee or hires a consultant to review the work undertaken by a contractor of the Permittee, the hiring of the consultant will be at the Permittee's expense.

11. Relationship of Coastal PD Permit Conditions, Laws, and Other Entitlements

The Permittee shall implement the Project in compliance with all applicable requirements and enactments of federal, state, and local authorities. In the event of conflict between various requirements, the more restrictive requirements shall apply. In the event the Planning Director determines that any Coastal PD Permit condition contained herein is in conflict with any other Coastal PD Permit condition contained herein, when principles of law do not provide to the contrary, the Coastal PD Permit condition most protective of public health and safety and environmental resources shall prevail to the extent feasible.

No condition of this Coastal PD Permit for uses allowed by the Ventura County Ordinance Code shall be interpreted as permitting or requiring any violation of law, lawful rules, or regulations, or orders of an authorized governmental agency. Neither the approval of this Coastal PD Permit, nor compliance with the conditions of this Coastal PD Permit, shall relieve the Permittee from any responsibility otherwise imposed by law for damage to persons or property.

12. Contact Person

Purpose: To designate a person responsible for responding to complaints.

Requirement: The Permittee shall designate a contact person(s) to respond to complaints from citizens and the County which are related to the permitted uses of this Coastal PD Permit.

Documentation: The Permittee shall provide the Planning Director with the contact information (e.g., name and/or position title, address, business and cell phone numbers, and email addresses) of the Permittee's field agent who receives all orders, notices, and communications regarding matters of condition and code compliance at the Project site.

Timing: Prior to the issuance of a Zoning Clearance for construction, the Permittee shall provide the Planning Division the contact information of the Permittee's field agent(s) for the Project file. If the address or phone number of the Permittee's field agent(s) should change, or the responsibility is assigned to another person, the Permittee shall provide Planning Division staff with the new information in writing within three calendar days of the change in the Permittee's field agent.

Monitoring and Reporting: The Planning Division maintains the contact information provided by the Permittee in the Project file. The Planning Division has the authority to periodically confirm the contact information consistent with the requirements of § 8183-5 of the Ventura County Coastal Zoning Ordinance.

13. Change of Permittee

Purpose: To ensure that the Planning Division is properly and promptly notified of any change of Permittee.

Requirement: The Permittee shall file, as an initial notice with the Planning Director, the new name(s), address(es), telephone/FAX number(s), and email addresses of the new owner(s), lessee(s), operator(s) of the permitted uses, and the company officer(s). The Permittee shall provide the Planning Director with a final notice once the transfer of ownership and/or operational control has occurred.

Documentation: The initial notice must be submitted with the new Permittee's contact information. The final notice of transfer must include the effective date and time of the transfer and a letter signed by the new Property Owner(s), lessee(s), and/or operator(s) of the permitted uses acknowledging and agreeing to comply with all conditions of this Coastal PD Permit.

Timing: The Permittee shall provide written notice to the Planning Director 10 calendar days prior to the change of ownership or change of Permittee. The Permittee shall provide the final notice to the Planning Director within 15 calendar days of the effective date of the transfer.

Monitoring and Reporting: The Planning Division maintains notices submitted by the Permittee in the Project file and has the authority to periodically confirm the information consistent with the requirements of § 8183-5 of the Ventura County Coastal Zoning Ordinance.

14. Material Storage

Temporary stockpile area(s) shall be in unvegetated, previously disturbed sites, in the middle camp cabin area, and outside of the creek. Fiber rolls will be installed around staging and storage areas. All temporary stockpile and storage areas shall be protected from stormwater run-off using temporary perimeter sediment barriers (fiber rolls) and/or sand/gravel bags, and straw bale barriers, as appropriate, until dirt can be taken off site. Stockpiled material shall be set back as far away from Little Sycamore Creek as possible. Fiber rolls will be installed along the perimeter of the stockpile to contain spoil material so that it is not allowed to re-enter the creek.

On January 31, 2019, the Planning Division approved an Emergency Permit for the removal of debris and mud and construction of five¹ check dams at different points within Little Sycamore Creek pursuant to the Ventura County Coastal Zoning Ordinance (CZO) Section 8181-3.7. The emergency work performed was the "minimum amount necessary" to alleviate the immediate threat. On February 15, 2019, construction activities commenced and were completed on April 30, 2019. RMA Planning Conditions of Approval Nos. 15 through 23 were required as part of the Emergency Authorization for

¹ As stated in the Emergency Permit, nine check dams were contemplated to be installed in Little Sycamore Creek. However, check dams 1, 2, 8 and 9 are not on Wilshire Boulevard Temple property. Therefore, the Emergency Coastal Development Permit authorized a total of five check dams, numbered 3 through 7 as shown on the approved project plans for the Emergency permit.

the removal of mud and debris and construction of the five check dams (Case No. PL19-0005) and have been satisfied.

15. Documentation Verifying Compliance with Other Agencies' Requirements Related to this Coastal PD Permit

Purpose: To ensure compliance with, and notification of, federal (USACE), state (CDFW, RWQCB), and/or local government regulatory agencies that have requirements that pertain to the Project (Condition No. 1, above) that is the subject of this Coastal PD Permit and the completion of Mitigation and Monitoring Reporting Program.

Requirement: The Permittee shall provide the Planning Division with documentation (e.g., copies of permits or agreements from other agencies, which are required pursuant to a condition of this Coastal PD Permit) to verify that the Permittee has obtained or satisfied all applicable federal, state, and local entitlements and conditions that pertain to the Project, or written verification permits or agreements from other agencies are not required.

Documentation: The Permittee shall provide this documentation to Planning Division staff in the form that is acceptable to the agency issuing the entitlement or clearance, to be included in the Planning Division Project file.

Timing: The documentation shall be submitted to the Planning Division prior to the issuance of the Zoning Clearance for construction or as dictated by the respective agency.

Monitoring and Reporting: The Planning Division maintains the documentation provided by the Permittee in the respective Project file. In the event that the federal, state, or local government regulatory agency prepares new documentation due to changes in the Project or the other agency's requirements, the Permittee shall submit the new documentation within 30 days of receipt of the documentation from the other agency.

On March 28, 2019, pursuant to the camp's Regional General Permit (RGP) No. 63 – Repair and Protection Activities in Emergency Situations, the United States Army Corps of Engineers (USACE) authorized temporary impacts of approximately 1.45 acres of non-wetland waters of the U.S. within Little Sycamore Creek. On January 24, 2019, the Los Angeles Regional Water Quality Control Board (LARWQCB) confirmed receipt from USACE of the proposed RGP 63 Emergency Permit (File No. 19-008.). Concurrent with the USACE and LARWQCB notifications, California Department of Fish and Wildlife (CDFW) was also notified. No permit or Operation of Law was issued, however, CDFW did confirm emergencies are recognized as not requiring a permit however, only work to protect life and property is permitted.

16. Grading and Brush Removal

All development shall be designed to minimize impacts and alterations of physical features and processes of the site (i.e., geological, soils, hydrological, water percolation and runoff) to the maximum extent feasible. The clearing of land (grading and brush removal) is prohibited during the winter rainy season (November 15 – April 15).

17. Best Management Practice (BMPs) to Prevent Erosion

During construction and operation, the Permittee shall implement construction Best Management Practices (BMPs) during all ground disturbing activities. BMPs shall include but not be limited to installation of temporary perimeter sediment barriers (fiber rolls) and/or sand/gravel bags, straw bale barriers, and confining equipment and fueling to a designated construction staging area. Trees along the bank, even if dead or damaged, will be left in place for their roots' stabilizing function.

18. Night Construction Avoidance

No nighttime work is permitted.

19. Site Materials and Refuse Management

All trash shall be disposed of in closed containers and removed from the Project area each day during the construction period. Construction personnel shall not feed or otherwise attract wildlife to the construction area. At Project completion, all project-generated debris, vehicles, building materials, and rubbish shall be removed from the impact area.

20. Temporary Access into Little Sycamore Creek

Prior to zoning clearance for construction, a site plan shall be submitted identifying temporary access roads to gain entry into the creek. Areas of temporary disturbance shall be minimized to the extent practicable (see Condition No. 20 below) and restored with any future creek stabilization under the camp rebuild project (Case No. PL21-0051)

21. Storage and Staging Equipment/Pollutant Management

Fueling, lubrication, maintenance, storage and staging of vehicles and equipment must not result in a discharge to any waters of the state and shall be located outside of waters of the state in areas where accidental spills will enter or affect such waters. Dump trucks will be staged outside of the creek banks. All vehicles and equipment not in use shall be confined to the designated temporary Staging and Storage Area(s). All vehicles and equipment shall be in good working condition and free of leaks. The contractor shall prevent oil, petroleum products, or any other pollutants from contaminating the soil or entering a watercourse (dry or otherwise). When vehicles or equipment are stationary, mats or drip pans shall be placed below vehicles to contain fluid leaks.

22. Re-Fueling and Maintenance

All re-fueling, cleaning, or maintenance of equipment will occur at least 100 feet from potentially jurisdictional waters.

23. Pollution Prevention

Prevent the discharge of silt or pollutants off the site when working adjacent to potentially jurisdictional waters. Install BMPs (i.e., silt barriers, sandbags, straw bales) as appropriate. Effective best management practices (BMPs) must be implemented to control erosion and runoff from areas, this includes access roads.

Condition Nos. 24 through 27 are the mitigation measures for CUP No. LU10-0069 which authorized continued use and maintenance of Camp Hess Kramer.

24. Construction Monitoring by a Qualified Biologist

Purpose: To avoid impacts to ESHA during the removal of mud and debris from the creek on the Camp Hess Kramer property.

Requirement: The Permittee shall retain the services of a County-approved qualified biologist to monitor ground-disturbance activities, including (but not limited to) clearing, grubbing, grading, and trenching that may impact ESHA.

Documentation: The Permittee shall provide to the Planning Division a signed contract (financial information redacted) with a County-approved biologist which requires the biologist to be present on-site during the bank stabilization and site restoration that may impact ESHA. The contract must specify: (1) when the County-approved biologist must monitor the Project site; and (2) the disturbance areas that the County-approved biologist must monitor. The Permittee shall submit a written document to the Planning Division within 14 days of the completion of ground-disturbance activities, notifying the Planning Division of the results of the monitoring.

Timing: The Permittee shall submit a copy of the contract with the County-approved biologist to the Planning Division for review and approval, prior to executing the contract. The Permittee shall provide a copy of the executed contract with the County-approved biologist to the Planning Division, prior to the issuance of a Zoning Clearance for construction. The Permittee shall submit the written document that sets forth the results of the monitoring to the Planning Division, within 14 days of the completion of ground-disturbance activities.

Monitoring and Reporting: The Planning Division maintains copies of the executed contract and the monitoring reports in the Project file. The Planning Division has the authority to inspect the property during the monitoring phase of the Project to ensure that the County-approved biologist is on-site as required. If the Planning Division confirms that the County-approved qualified biologist is not monitoring the Project in compliance with this condition, enforcement actions may be enacted in accordance with § 8183-5 of the Ventura County Coastal Zoning Ordinance.

Construction was monitored by a qualified biologist.

25. Avoidance of Nesting Birds

Purpose: In order to prevent impacts to birds protected under the Migratory Bird Treaty Act, land clearing and construction activities shall be regulated.

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

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

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

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

biologist following land clearing activities documenting actions taken to avoid nesting birds and results.

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

Monitoring and Reporting: The Planning Division reviews the Survey Report and signed contract for adequacy prior to issuance of a Zoning Clearance for construction. The Planning Division maintains copies of the signed contract, Survey Report, and Mitigation Monitoring Report in the Project file.

26. Avoidance of Monarch Butterfly Winter Roost Sites

Purpose: To minimize indirect project impacts to monarch butterfly roosts in the California Sycamore Woodland along the Little Sycamore Canyon Creek.

Requirement: The Permittee shall avoid monarch butterfly roosts during all construction activities related to restoration of the creek. This can be accomplished by implementing either one of the following options:

1. Timing of construction: Prohibit land clearing activities during the monarch wintering season (October 1 through March 1); or,
2. Surveys and avoidance: Conduct site-specific surveys prior to land clearing activities during the monarch wintering season (October 1 through March 1) and avoid monarch roosts.

Surveys shall be conducted to identify any monarch roosts in the area proposed for disturbance. Monarch roosts shall be avoided during the wintering season by establishing a 100-foot buffer between land clearing activity and the roost. All surveys shall be conducted by a County-approved biologist with a CDFW Scientific Collecting Permit.

An initial monarch survey shall be conducted 30 days prior to the initiation of land clearing activities. The project site must continue to be surveyed on a weekly basis with the last survey completed no more than 7 days prior to the initiation of land clearing activities. The monarch butterfly survey must cover monarch wintering habitat within entire length of the survey area along Little Sycamore Canyon Creek.

If monarch roosts are found, land clearing activities within 100 feet surrounding the roost shall be postponed or halted while the monarchs are present (typically October 1 through March 1). Construction activities may occur outside of the 100-foot setback areas.

Documentation: The Permittee shall provide to the Planning Division a Survey Report from a County-approved biologist documenting the results of the initial monarch survey and a plan for continued surveys and avoidance of roosts in accordance with the requirements above. Along with the Survey Report, the Permittee shall provide a copy of a signed contract (financial information redacted) with a County-approved biologist responsible for the surveys and monitoring of any monarch roosts that are discovered. The Permittee shall submit to the Planning Division a Mitigation Monitoring Report from a County-approved biologist following land clearing activities that documents the results of subsequent surveys and actions taken to avoid monarch roosts.

Timing: If land clearing activities will occur between October 1 and March 1, monarch surveys shall be conducted 30 days prior to initiation of land clearing activities, and weekly thereafter, and the last survey for monarchs shall be conducted no more than 7 days prior to initiation of land clearing activities. The Survey Report documenting the results of the first monarch survey and the signed contract shall be provided to the Planning Division prior to issuance of a Zoning Clearance for construction. The Mitigation Monitoring Report shall be submitted within 14 days of completion of the land clearing activities.

Monitoring and Reporting: The Planning Division shall review for adequacy the Survey Report and signed contract prior to issuance of a Zoning Clearance for construction. The Planning Division maintains copies of the signed contract, Survey Report, and Mitigation Monitoring Report in the project file.

27. Archaeological Resources

Purpose: To avoid significant impacts to archeological resources that may exist on the subject property.

Requirement: The Permittee shall retain a Qualified Archaeologist and Native American monitor to monitor all subsurface grading, trenching, or construction activities on the Project site. The Permittee shall provide to the Planning Division a signed contract (financial information redacted) with a County-approved Archaeologist and Native American which requires the monitors to be present on-site during the ground disturbing activities. The contract must specify: (1) when the County-approved Archaeologist and Native American must monitor the Project site; and (2) the disturbance areas that the County-approved Archaeologist and Native American must monitor. The Permittee shall submit a written document to the Planning Division within 14 days of the completion of ground-disturbance activities, notifying the Planning Division of the results of the monitoring.

Documentation: The County-approved archaeologist in consultation with the Native American monitor shall provide a monthly report to the Planning Division summarizing the activities during the reporting period. If no archaeological resources are discovered, the County-approved archaeologist shall submit a brief letter to the Planning Division, stating that no archaeological resources were discovered and that the monitoring activities have been completed.

Timing: The County-approved archaeologist and Native American monitor shall monitor the Project site during all subsurface grading activities. The County-approved archaeologist and Native American monitor shall provide the reports monthly during all subsurface grading.

Monitoring and Reporting: The Planning Division reviews the monitoring reports and maintains the monitoring reports in the Project file. The County-approved archaeologist and Native American monitor shall monitor the Project site during all subsurface grading. The Planning Division has the authority to conduct site inspections to ensure that the monitoring activities occur in compliance with this condition, consistent with the requirements of § 8183-5 of the Ventura County Coastal Zoning Ordinance.

A Native American Monitor was onsite during the State's removal of debris from the project site.

Environmental Health Division (EHD) Conditions

28. General Vector Control – Mosquito Breeding

Purpose: To ensure site does not contribute to the harborage and/or breeding of potential vectors of disease or create a public nuisance.

Requirement: Manage standing water onsite so it will not create mosquito breeding sources.

Timing: The Permittee shall maintain the Project site so as not to contribute to the harborage and/or breeding of mosquitos, nor the creation of a public nuisance throughout the life of the Project.

Monitoring and Reporting: Ventura County Environmental Health Division (EHD) staff respond to, and maintain records of, any complaints received which relate to mosquito breeding at the site.

29. Hazardous Materials and Waste-Debris Removal

Purpose: To ensure compliance with the Wildfire Debris Removal Emergency Ordinance No. 4534 and to ensure the storage, handling, and disposal of any potentially hazardous material/waste complies with applicable State and local regulations.

Requirement: In the event that hazardous materials/waste is found commingled in the

mud and debris piles, all hazardous materials/waste shall be separated from mud and debris prior to disposal. Permittee may not send hazardous materials/waste to a municipal solid waste (garbage) landfill or to a non-hazardous waste recycling center.

Documentation: Maintain all receipts related to mud and debris disposal, and hazardous materials/waste recycling/disposal for review by Ventura County EHD.

PUBLIC WORKS AGENCY (PWA)

Watershed Protection District (WPD) Conditions

Advanced Planning Section

30. **Watercourse Permit**

Purpose: To comply with the Ventura County Watershed Protection District (WPD) Ordinance WP-2, and mitigate potential impacts such as obstructing, impairing, diverting, impeding, or altering the characteristics of the flow of water to jurisdictional channels by designing and constructing appropriate surface drainage and flood control facilities to protect life and property from damage or destruction from flood and storm waters.

Requirement: The Permittee shall obtain a Watercourse Permit. The permit application shall include the following:

- a. Construction plans prepared, signed, and stamped by a California licensed civil engineer including but not limited to, a site plan depicting general drainage trends, existing and proposed topography with elevations, proposed improvements in both plan and profile, and construction details that meet the standards of the County and the Watershed Protection District.
- b. Hydraulics using a methodology applicable to the proposed improvements and acceptable to the Watershed Protection District. The final hydraulic model shall confirm there are no adverse impacts to Little Sycamore Canyon, including no loss of storage volume and no increase in water surface elevation for the 1-percent chance flood peak discharge on adjacent parcels.
- c. Any other information or studies as required by the Permit Section to administer the requirements of Watershed Ordinance WP-2.

Documentation: A WPD Permit application package shall be prepared and signed by the Permittee or a duly authorized agent and submitted to and logged by the WPD Permit Section.

Timing: The applicant shall obtain an after-the-fact permit prior to issuance of the Zoning Clearance for construction.

Monitoring and Reporting: Prior to permit closure, Watershed Protection District staff shall inspect the improvements to assure that construction was completed, in accordance with the approved plans and the Permit.

County Stormwater Program (CSP) Section

31. Compliance with Stormwater Development Construction Program

Purpose: To ensure compliance with the Los Angeles Regional Water Quality Control Board Municipal Stormwater Permit No. CAS004002 (Permit) the Project will be subject to the construction requirements for surface water quality and storm water runoff in accordance with Part 4.F., "Development Construction Program" of the Permit.

Requirement: The construction of the Project shall meet requirements contained in Part 4.F. "Development Construction Program" of the Permit through the inclusion of effective implementation of the Construction BMPs during all ground disturbing activities. In addition, Part 4.F requires additional inspections to be conducted by the Qualified Stormwater Pollution Prevention Plan (SWPPP) Developer, Qualified SWPPP Practitioner, or Certified Professionals in Erosion and Sediment Control (CPESC).

Documentation: The Permittee shall submit to the Watershed Protection District – County Stormwater Program Section (CSP) for review and approval a completed SW-HR form (Best Management Practices for Construction at High Risk Sites), which can be found at

<https://www.onestoppermits.vcrma.org/departments/stormwater-program>.

Timing: The above listed item shall be submitted to the CSP for review and approval prior to issuance of a Zoning Clearance for construction.

Monitoring and Reporting: CSP will review the submitted materials for consistency with the NPDES Municipal Stormwater Permit. Building Permit Inspectors will conduct inspections during construction to ensure effective installation of the required BMPs and record keeping of conducting required inspections by the Project proponents Qualified SWPPP Developer, Qualified SWPPP Practitioner, or CPESC.

Ventura County Air Pollution Control District (APCD) Conditions

32. APCD Rules and Regulations for Project Construction and Excavation

Purpose: To ensure that fugitive dust and particulate matter that may result from site preparation and grading activities are minimized to the greatest extent feasible.

Requirement: The Permittee shall comply with the provisions of applicable VCAPCD Rules and Regulations, which include but are not limited to, Rule 50 (Opacity), Rule 51 (Nuisance), and Rule 55 (Fugitive Dust).

Documentation: The Permittee shall ensure compliance with the following provisions:

- i. The area disturbed by clearing, grading, earth moving, or excavation operations shall be minimized to prevent excessive amounts of dust;
- ii. Pre-grading/excavation activities shall include watering the area to be graded or excavated before commencement of grading or excavation operations. Application of water should penetrate sufficiently to minimize fugitive dust during grading activities;
- iii. All trucks shall cover their loads as required by California Vehicle Code §23114.
- iv. Fugitive dust throughout the construction site shall be controlled by the use of a watering truck or equivalent means (except during and immediately after rainfall). Water shall be applied to all unpaved roads, unpaved parking areas or staging areas, and active portions of the construction site. Environmentally-safe dust control agents may be used in lieu of watering.
- v. Graded and/or excavated inactive areas of the construction site shall be monitored at least weekly for dust stabilization. Soil stabilization methods, such as water and roll compaction, and environmentally safe dust control materials, shall be periodically applied to portions of the construction site.
- vi. Temporary signs shall be posted onsite limiting traffic to 15 miles per hour or less.
- vii. All clearing, grading, earth moving, or excavation activities shall cease during periods of high winds (i.e., wind speed sufficient to cause fugitive dust to be a nuisance or hazard to adjacent properties). During periods of high winds, all clearing, grading, earth moving, and excavation operations shall be curtailed to the degree necessary to prevent fugitive dust created by on-site activities and operations from being a nuisance or hazard, either offsite or on site.

Timing: Throughout the construction phases of the project.

Reporting and Monitoring: Monitoring and Enforcement of dust-related provisions for construction operation shall be conducted by APCD staff and is complaint-driven.

Initial Study Biological Assessment

Original ISBA Report Date: July 22, 2011

Revised ISBA Report Date: September 29, 2011 (all items indicated in the County Biologist's Incompleteness Letter, dated August 22, 2011, have been addressed herein.)

Case Number: LU10-0069

Permit Type: Conditional Use Permit

Applicant: Camp Hess Kramer, Inc.

Case Planner: Andrea Ozdy

Total parcel(s) size: Approximately 187 acres

Assessor Parcel Number(s): 700-0-070-450, 700-0-060-140, 700-0-060-260, and 700-0-060-310

Development Proposal Description: Camp Hess Kramer, Inc. requests approval of a Conditional Use Permit to continue operations at Camp Hess Kramer for twenty (20) years with an option to renew for an additional 20 years. Camp Hess Kramer is proposing to install an advanced onsite wastewater treatment system (OWTS) that would serve its existing Middle and Lower Camps.

Prepared for Ventura County Planning Division by:

As a Qualified Biologist, approved by the Ventura County Planning Division, I hereby certify that this Initial Study Biological Assessment was prepared according to the Planning Division's requirements and that the statements furnished in the report and associated maps are true and correct to the best of my knowledge.

Qualified Biologist (signature):			Date: September 29, 2011
Name: Cher Batchelor:	Title: Senior Biologist/ Project Manager	Company: Rincon Consultants, Inc.	
Phone: 805-644-4455 x38	email: cbatchelor@rinconconsultants.com		
Qualified Biologist (signature):			Date: September 29, 2011
Name: Duane Vander Pluym	Title: Principal Biologist	Company: Rincon Consultants, Inc.	
Phone: 805-644-4455 x13	email: duane@rinconconsultants.com		
Role: Report review and technical assistance			
Other Biologist (signature):			Date: September 29, 2011
Name: Stephanie Lopez	Title: Associate Biologist	Company: Rincon Consultants, Inc.	
Phone: 805-644-4455 x33	email: slopez@rinconconsultants.com		
Role: Assisted with site visit, mapping, and report preparation.			

County of Ventura Planning Director Hearing PL19-0005 Exhibit 9 - July 22, 2011, Initial Study Biological Assessment for LU10-0069
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Initial Study Checklist

This Biological Assessment DID provide adequate information to make recommended CEQA findings regarding potentially significant impacts.

		Project Impact Degree of Effect				Cumulative Impact Degree of Effect			
		N	LS	PS-M*	PS	N	LS	PS-M*	PS
A	Endangered, threatened or rare species (includes nests)			X			X		
B	Wetland habitat		X				X		
C	Coastal habitat		X				X		
D	Wildlife movement routes		X				X		
E	Locally important species/communities			X			X		

N: No impact

LS: Less than significant impact

PS-M: Potentially significant unless mitigation incorporated.

PS: Potentially significant

* DO NOT check this box unless the Biological Assessment provided information adequate enough to develop mitigation measures that reduce the level of impact to less than significant.

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Attachment

- A. List of California Natural Diversity Database (CNDDDB)-tracked species with recorded occurrences within at least a 10-mile radius of the project site.

Summary

Camp Hess Kramer, Inc. is requesting approval of a Conditional Use Permit to continue operations at Camp Hess Kramer. Camp Hess Kramer is proposing to install an advanced onsite wastewater treatment system (OWTS) that would serve its existing Middle and Lower Camps. The 1.1-acre construction footprint includes the location of the proposed OWTS, and a 3-foot work area buffer along all sides of the proposed system. Applicant has designed the proposed project to be either within or directly adjacent to existing roads and trails to avoid/minimize impacts to sensitive biological resources to the maximum extent possible. In addition, the project will be field fitted during construction and OWTS installation to avoid any impacts to coastal habitats.

All four plant communities observed within the survey area (California Sycamore Woodland, Coast Live Oak Woodland, Giant Coreopsis Scrub, and California Sagebrush-Black Sage Scrub) are considered **Locally Important Communities**. All habitats within the parcels, in which the construction footprint is located, are also considered to be **ESHA**. However, all activities associated with the construction of the OWST within existing roads and trails, the project has been designed to avoid and prevent impacts that would significantly degrade the creek's Coast Live Oak Woodland and Southern California Sycamore Woodland habitats, and is compatible with the continuance of the riparian habitats. Impacts to locally important communities and ESHA are considered less than significant. No **critical habitat** occurs within one mile of the project site, and no critical habitat will be affected by the proposed project.

Little Sycamore Canyon Creek (LSCC) dissects the easternmost two lots of the subject parcel/survey area, flowing along a north-south trajectory for the length of the lots. Due to current and historic land uses, the minimal level of temporary ground disturbance associated with the proposed project, and the existing development currently located within the County-required 100-foot setback buffer, no additional buffer is necessary to protect the current creek functions. The extent of any inadvertent indirect impacts to wetlands, if they occurred, would be minimal, could be easily rectified, and would be considered less than significant.

No **regional wildlife linkages or corridors** are mapped within or near the property. On a local scale, the entire survey area is general open space/wildlife habitat. Although connectivity features exist onsite, none of them are used by local wildlife specifically to access distinct unique habitat patches or separate resources. Impacts to wildlife movement are considered less than significant.

No **federal or state listed** endangered, threatened, or rare **plant or animal species** were observed onsite. None of the listed species tracked within 10 miles of the project site have a moderate or high potential to occur onsite; therefore, no impacts to listed animal species are expected to result from the proposed project.

No locally important plant species were observed onsite; however, four **locally important plant species** have a moderate potential to occur onsite or were observed onsite. No seasonal rare plant surveys have been performed to date within the subject project site. However, no impacts to natural vegetation are proposed as part of this project; therefore, impacts to locally important plant species are considered less than significant.

No **locally important animal species** were observed onsite; however, four locally important animals have a moderate potential to occur onsite based on suitable habitat, or are reported as occurring onsite. No impacts to Cooper's hawk, coastal whiptail, or two-striped garter snake are expected; however, the project may indirectly affect a monarch overwintering roost site located approximately 75 feet south of the construction footprint. Potential indirect impacts to monarch roost sites are considered potentially significant but mitigable.

It is likely that birds that are protected by the California Fish and Game Code and the federal Migratory Bird Treaty Act nest onsite. Although no trees or vegetation are proposed to be removed for this project, indirect effects of the installation of the proposed project may result in modifications of bird breeding activities and **nesting** if the project is conducted during the nesting season.

Several native **protected tree species** are present within the survey area. No individual tree is proposed to be removed as part of the proposed project; however, protected trees may be indirectly affected by root damage. Although the project will be field fitted during construction to avoid impacts to protected trees, potential inadvertent or unavoidable impacts to protected trees resulting from the project are considered potentially significant but mitigable.

The **mitigation measures** proposed to lower potentially significant impacts to a less than significant level include MM1 - Nesting Bird Surveys and Buffers, MM2 - Monarch Butterfly Winter Roost Site Surveys, and MM3 - Monitor Protected Trees.

Section 1: Construction Footprint Description

Construction Footprint Definition (per the Ventura County Planning Division): The construction footprint includes the proposed maximum limits of temporary or permanent direct land or vegetation disturbance for a project including such things as the building pad(s), roads/road improvements, grading, septic systems, wells, drainage improvements, fire hazard brush clearance area(s), tennis courts, pools/spas, landscaping, storage/stockpile areas, construction staging areas, fire department turnarounds, utility trenching and other grading areas. The construction footprint on some types of projects, such as mining, oil and gas exploration or agricultural operations, may be quite different than the above.

Development Proposal Description:

Camp Hess Kramer, Inc. is requesting approval of a Conditional Use Permit to continue operations at Camp Hess Kramer for twenty (20) years with an option to renew for an additional 20 years. Camp Hess Kramer is proposing to install an advanced onsite wastewater treatment system (OWTS) that would serve its existing Middle and Lower Camps. The OWTS would consist of approximately 5,000 linear feet of 4-inch and 6-inch polyvinyl chloride (PVC) gravity sewer line, approximately 400 linear feet of force main, 15 manholes, the Orenco Systems, Inc. AdvanTex recirculating bed filter system or equivalent, 21 dry wells, and 34 seepage pits.

Wastewater would be transferred from Middle to Lower Camp via a 4-inch and 6-inch sewer gravity line. Four-inch force mains, pumps, and collection systems would be constructed at the three vehicle bridge crossings and a pedestrian bridge. Wastewater would be discharged into the AdvanTex recirculating bed filter system located southeast of the Alan A. Seiner Memorial Sports Center and would include three settlement tanks (75,000-gallons total) for primary treatment, a 25,000-gallon recirculation tank for secondary treatment, and a 25,000-gallon dosing tank. From the dosing tank, effluent would be distributed to treatment pods (ten total) located at the southern end of Gil Fitch Field before being discharged into the seepage pits.

The OWTS will be maintained through a multiyear contract with a licensed operator such as the Ventura Regional Sanitary District (VRSD). The actual operator has not been chosen at this time; however maintenance of the OWTS will be in accordance with all rules and regulations of the County of Ventura and State Regional Water Control Board. Strict maintenance and operation standards will be adhered to along with measures for all emergency situations and power outages.

The sludge accumulated in the septic tanks would be minimal; primary tanks would be pumped every 2-5 years depending on kitchen usage by a Ventura County licensed Septic Tank Pumper and the sludge taken to a waste water treatment facility (the same as a standard septic tank). All existing septic tanks and sewer lines no longer being used by Middle and Lower Camps would be abandoned in place.

Construction Footprint Size

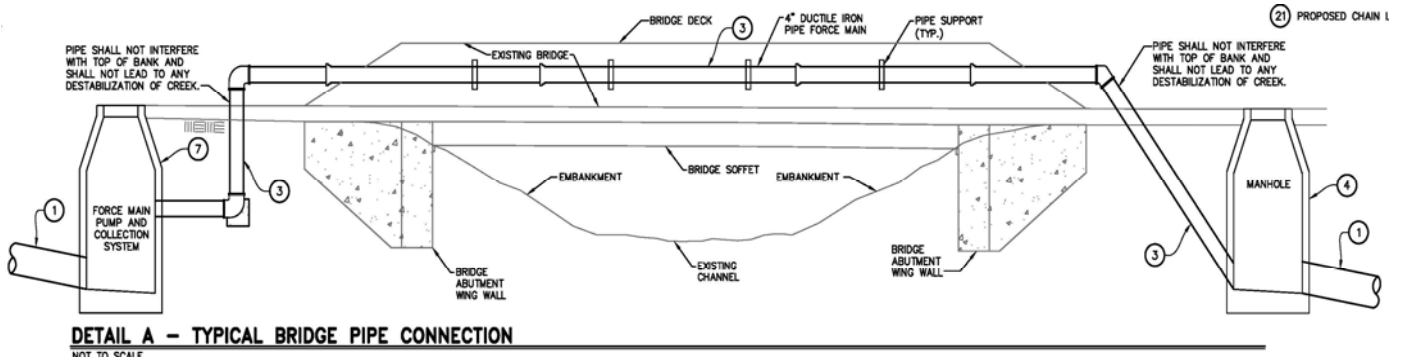
The construction footprint includes the location of the proposed OWTS, a three-foot work area buffer along all sides of the entire proposed system. No fuel modification is expected; however, if above ground structures associated with the septic system ultimately are required, a 10-foot fuel modification zone would be required within already disturbed/developed areas associated with the ball fields in the southeastern portion of the survey area near the entrance to the camp. No clearance of natural vegetation would be required for such potential structures. The proposed location for the "settlement, recirculation, and dosing tanks" in the far southern end of the property will only impact ornamental plantings, and would avoid native scattered shrubs in this area along PCH. The approximate size of the construction footprint is 1.1 acres.

Development Area Size (construction footprint size without driveway and brush clearance area)

The development area will be temporary in nature. The temporary development area is the construction footprint and the square footage necessary to install the OWTS, including turn-around and storage areas.

Project Design for Impact Avoidance or Minimization

Applicant has designed the proposed project to be either within or directly adjacent to existing roads and trails to avoid/minimize impacts to sensitive biological resources (e.g., Little Sycamore Canyon Creek, ESHA, and protected trees) to the maximum extent possible. All areas where the pipeline will cross the creek via bridges have been designed to completely avoid the top of the banks of the creek and will not lead to any destabilization of the creek banks (refer to the Typical Bridge Pipe Connection detail below). In addition, the project will be field fitted during construction to avoid impacts to sensitive resources to the maximum extent.



Coastal Zone/Overlay Zones

The project site is located within the Coastal Zone (zoning designation CRE-40 ac/M). The overlay zone is Santa Monica Mountains.

Zoning

The following table provides zoning information for each lot owned by Camp Hess Kramer, Inc. The purpose of the Coastal Open Space zone is to provide for the preservation, maintenance, and enhancement of natural and recreational resources in the coastal areas of the County while allowing reasonable and compatible uses of the land. The purpose of the Coastal Rural Exclusive zone is to provide for residential areas with semirural atmosphere, but exclude agricultural uses to a great extent and concentrate on residential uses.

APN	Coastal Open Space	Coastal Rural Exclusive
7000060140	X	X
7000060260	X	-
7000060310	-	X
7000070450	-	X

Elevation

Elevation of the four lots ranges from 26 feet -842 feet above mean sea level. Elevation is highest at the northwest corner of lot 7000060140 and is lowest where Little Sycamore Creek exits lot 7000070450 at the southeast corner.

Section 2: Survey Area Description and Methodology

2.1 Survey Purpose

Discretionary actions undertaken by public agencies are required to demonstrate compliance with the California Environmental Quality Act (CEQA). The purpose of this Initial Study Biological Assessment (ISBA) is to gather enough information about the biological resources associated with the proposed project, and their potential to be impacted by the project, to make a CEQA Initial Study significance finding for biological resources. In general, ISBA's are intended to:

- Provide an inventory of the biological resources on a project site and the values of those resources.
- Determine if a proposed project has the potential to impact any significant biological resources.
- Recommend project redesign to avoid, minimize or reduce impacts to significant biological resources.
- Recommend additional studies necessary to adequately assess potential impacts and/or to develop adequate mitigation measures.
- Develop mitigation measures, when necessary, in cases where adequate information is available.

2.2 Survey Area Description

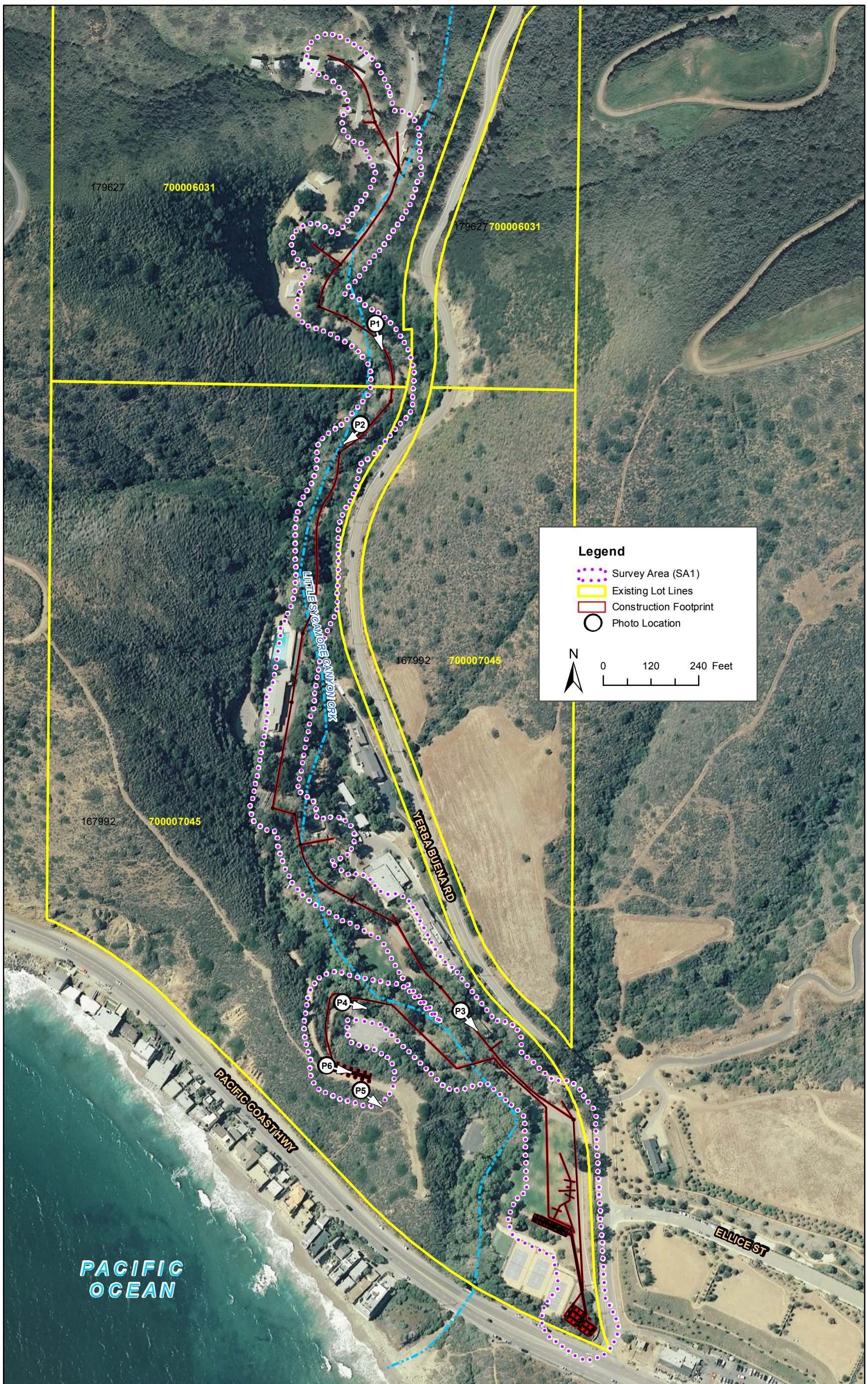
Survey Area Definition (per the Ventura County Planning Division): The physical area a biologist evaluates as part of a biological assessment. This includes all areas that could potentially be subject to direct or indirect impacts from the project, including, but not limited to: the construction footprint; areas that would be subject to noise, light, dust or runoff generated by the project; any required buffer areas (e.g., buffers surrounding wetland habitat). The construction footprint plus a 300-foot buffer—beyond the required fire hazard brush clearance boundary—(or 20-foot from the cut/fill boundary or road fire hazard brush clearance boundary – whichever is greater) is generally the minimum size of a survey area. Required off-site improvements—such as roads or fire hazard brush clearance—are included in the survey area. Survey areas can extend off the project's parcel(s) because indirect impacts may cross property lines. The extent of the survey area shall be determined by the biologist in consultation with the lead agency.

Survey Area 1 (SA1)

The survey area includes the construction footprint (proposed OWTS, a three-foot work area buffer along all pipeline, proposed tanks, and seepage pits), and a 50-foot buffer around the construction footprint to address the potential for indirect impacts (Figure 1). The survey area is approximately 13.4 acres.

Location

Camp Hess Kramer, Inc. is located at 11495 Pacific Coast Highway (PCH), within the Santa Monica Mountains and the Coastal Zone portion of unincorporated Ventura County, California. Camp Hess Kramer is located on the west side of Yerba Buena Road at its intersection with PCH. The survey area was established along the Little Sycamore Canyon Creek corridor, and approximately 500 feet from the Pacific Ocean. Existing camp facilities are adjacent to the creek on both the east and west sides of the creek, and the main access road crosses the creek in several locations. The survey area encompasses the proposed OWTS and a 50-foot survey buffer.



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Basemap Source: Penfield and Smith, November 6, 2010.

Site and Survey Map

Figure 1

Survey Area Environmental Setting

The Camp Hess Kramer property is developed with three camping areas, Gindling Hilltop Camp (upper camp), Camp Hess Kramer (middle camp), and Camp Hess Kramer (lower camp). The upper camp has 15 structures including seven (7) guest cabins with bathrooms and showers, staff housing, a dining hall, administration office, pool and recreation areas. Several of the structures were built as early as 1968. The middle camp has 23 structures, 19 of which are guest cabins (some with bathrooms and showers). The middle camp also has two shower buildings and one restroom building. The lower camp is comprised of an assembly building (i.e. Baruh Hall), a meeting room (i.e. Gildred Hall), an arts and crafts area and separate buildings for restrooms, an infirmary, dining hall, adult sleeping quarters, a conference center and adult overnight accommodations, executive and staff housing, maintenance shop, staff restroom building, pool and recreation areas.

The topography of the survey area is highly variably with multiple steep northeast and southwest facing slopes. Little Sycamore Canyon Creek flows north to south through the site. Several ephemeral drainages terminate at Little Sycamore Canyon Creek along the length of the survey area.

Little Sycamore Canyon Creek contains riparian vegetation, native and non-native trees and has been greatly influenced by the camp facilities and human uses. Facilities exist on either side of the creek. A paved road is lies directly adjacent to the creek and crosses the creek numerous times via bridges.

Native natural coastal sage scrub, oak woodland, and sycamore woodland are present throughout the survey area, intermixed with developed areas grassland/ruderal and disturbed areas.

Surrounding Area Environmental Setting

Camp Hess Kramer is located within the Santa Monica Mountains approximately 500 feet north of the Pacific Ocean and is surrounded by a mosaic of coastal scrub, woodlands, native and nonnative grassland, residences, and roads.

Cover

Provide a rough estimate of the cover of the survey area using the categories below. Additional categories can be used if appropriate for a given project.

35% native vegetation; 20% non-native vegetation; 5% bare ground/cleared/graded; 40% buildings, paved roads and other impervious cover

2.3 Methodology

References

- California Department of Fish and Game BIOS (November 2007). <http://imaps.dfg.ca.gov/viewers/ventura/app.htm>
- California Department of Fish and Game (July 2009). *Special Animals*. Habitat Conservation Division, Wildlife and Habitat Data Analysis Branch.
- California Department of Fish and Game (January 2010). *Special Vascular Plants, Bryophytes and Lichens List*. Natural Heritage Division, Natural Diversity Data Base.
- California Department of Fish and Game (September 2010). *Natural Communities List*. Available at: <http://www.dfg.ca.gov/biogeodata/vegcamp/pdfs/natcomlist.pdf>
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- California Native Plant Society Inventory of Rare and Endangered Plants database, v7-09b 4-10-09, http://cnps.web.aplus.net/cgi-bin/inv/inventory.cgi/Html?item=checkbox_9.htm#q9
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- Dixon, John (March 25, 2003). *Memorandum to Ventura County Staff – Designation of ESHA in the Santa Monica Mountains*. California Coastal Commission, 24 pgs.
- Holland, R.F. 1986. *Preliminary descriptions of the terrestrial natural communities of California*. California Department of Fish and Game.
- Reed, P.B., Jr. 1988. *National List of Plant Species that Occur in Wetlands: California (Region 0)*. (Biological Report 88[26.10].) U.S. Fish and Wildlife Service, Ft. Collins, Colorado.
- Sawyer, J.O., and T. Keeler-Wolf. 1995. *A Manual of California Vegetation*. California Native Plant Society, Sacramento, California.
- USGS-NPS Vegetation Mapping Program. May 23, 2007. Santa Monica Mountains National Recreation Area Photo Interpretation Report.
- Ventura County Planning Division, GIS Biology Map Packet (November 2008). Consists of mapped resource information for the project site, including: wetlands and waterbodies; wildlife corridors/connectivity areas; vegetation; and high resolution aerial imagery.
- Ventura County Planning Division. July 24, 2007. *Ventura County Oak Woodlands Management Plan*. Resource Management Agency.
- Ventura County (2008). Locally Important Plants.
- Ventura County (2008). Locally Important Animals.
- Ventura County Planning Division (February 28, 2010). Pending and Recently Approved Projects list.

Survey Details Table

Rincon conducted a literature review to determine what special-status biological resources are tracked in the vicinity of the project site. Topographic maps and current and historical aerial photographs were also reviewed to assess past and existing biological conditions onsite and in the immediate vicinity. A site visit was conducted by Rincon Senior Biologist Cher Batchelor and Biologist Stephanie Lopez on February 10, 2011, and to generally document the extent of biological resources on the property, to assess the potential for special-status plant and animal species to occur onsite. The survey area was walked with the Camp Director, Construction and Facilities, Rick Waters, using current plans.

Survey Date & Details							
Survey Key	Survey Date	Survey Area Map Key(s)	Survey Type	Time Period	Methods/Constraints	GPS	Surveyors
SD1	3/10/2011	SA1	ISBA	9:30 am - 12:30 pm	Walking alignment of proposed wastewater treatment system. The entire site was accessible.	Trimble GeoXT GPS	Cher Batchelor, Stephanie Lopez
ISBAInitial Study Biological Assessment							
Botanical.....Botanical Survey							

Section 3: The Biological Inventory

See Appendix One for an overview of the types of biological resources that are protected in Ventura County.

3.1 Habitats: Plant Communities, Physical Features and Wetlands

(Initial Study Checklist A, B, C & E)

Plant Communities

Locally important or rare plant communities were found within the survey area(s).

Major Plant Communities Summary

Seven major plant communities were observed and mapped onsite, including Coast Live Oak Woodland, California Sycamore Woodland, Giant Coreopsis Scrub, California Sagebrush-Black Sage Scrub, Annual Brome Grassland, Developed Areas/Roads, and Ornamental-Native Mix. These are summarized in the table below, delineated on Figure 2, and described in detail in the following paragraphs.

Plant Communities								
Map Key	SVC Alliance	SVC Association	Misc.	Status	Condition	Acres in Survey Area	Acres Impacted	Comments
PC1	Coast Live Oak Woodland	<i>Quercus agrifolia</i> Woodland Alliance	-	ESHA, LIC, Cal OWA	Moderately Disturbed by existing Camp	1.9	0	Roads and development present
PC2	California Sycamore Woodland	<i>Platanus racemosa</i> Woodland Alliance	-	ESHA, LIC, CDFG G3S3	Moderately Disturbed by existing Camp	5.4	0	Roads and development present
PC3	Giant Coreopsis Scrub	<i>Coreopsis gigantea</i> Shrubland Alliance	-	ESHA, LIC	Relatively Intact	1.2	0	A trail along the ridgeline bisects this alliance
PC4	California Sagebrush – Black Sage Scrub	<i>Artemisia californica-Salvia mellifera</i> Shrubland Alliance	-	ESHA, LIC	Relatively Intact	0.1	0	May be affected periodically by fuel modification (thinning)
PC5	Annual Brome Grassland	<i>Bromus diandrus-Bromus hordeaceus</i> Herbaceous Alliance	-	-	-	0.4	0	Disturbed
PC6	Developed Areas/Roads	-	-	-	-	2.2	1.1	Includes dirt trails
PC7	Ornamental-Native Mix	-	-	-	-	2.2	0.5	Includes areas along the access road that have been planted with ornamental species with remnant scattered native trees and shrubs.
Totals						13.4	1.6 ac of developed/ornamental	No native vegetation is expected to be impacted by the proposed project

LIC = Locally Important Plant Community. ESHA = Environmentally Sensitive Habitat Areas (Coastal Zone).

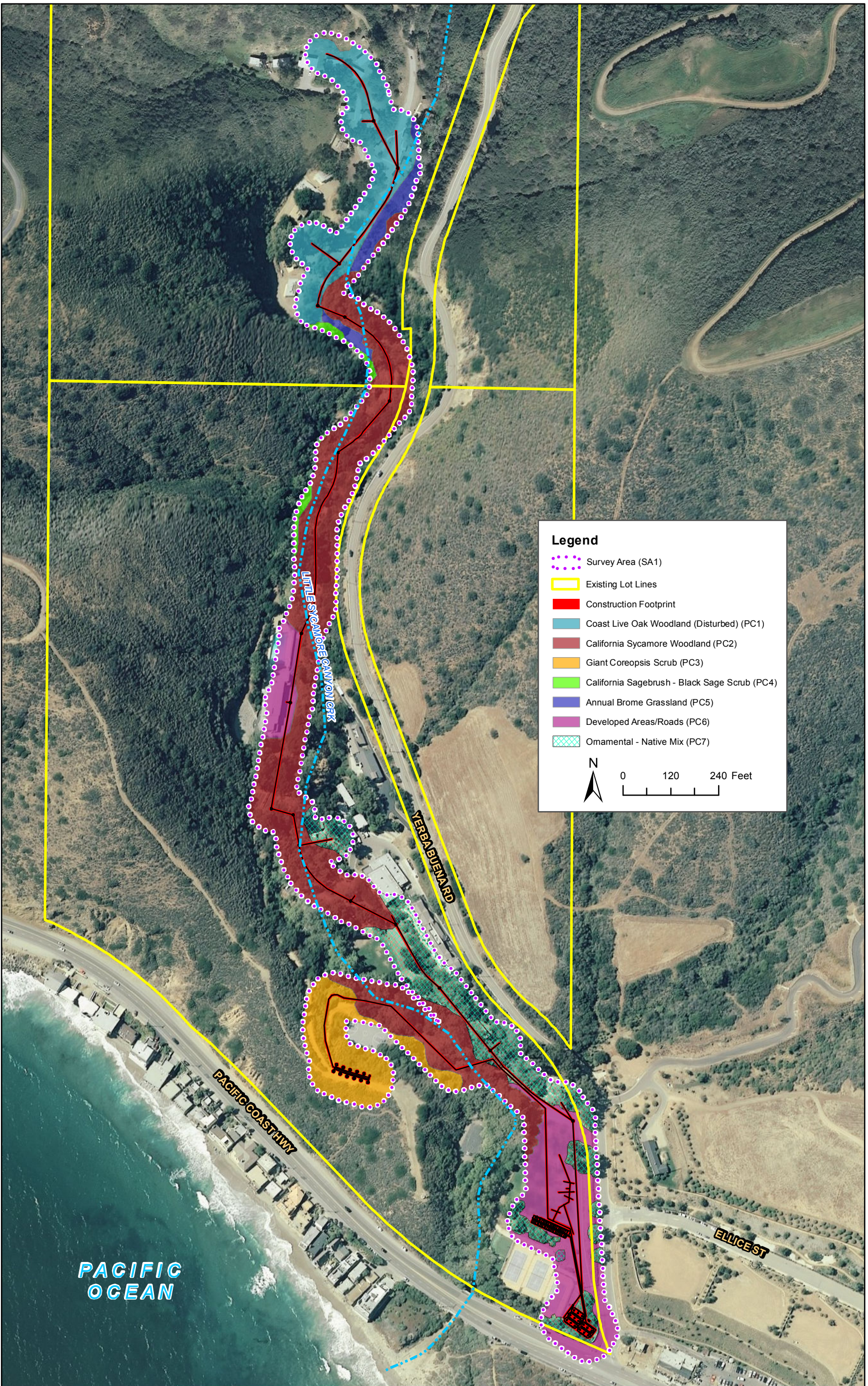
CDFG Rare:

G1 or S1 Critically Imperiled Globally or Subnationally (state)

G2 or S2 Imperiled Globally or Subnationally (state)

G3 or S3 Vulnerable to extirpation or extinction Globally or Subnationally (state)

Cal OWA = Protected by the California Oak Woodlands Act.



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Basemap Source: Penfield and Smith, November 6, 2010.

Plant Communities Map

Figure 2
Camp Hess Kramer

Coast Live Oak Woodland (PC1) (*Quercus agrifolia* Woodland Alliance) is dominated by *Quercus agrifolia* var. *agrifolia*, which is an evergreen, wide-topped tree with furrowed, dark gray bark. These oak trees can reach 30 meters tall forming continuous, intermittent, or open canopies with occasional or common understory shrubs and an absent or grassy ground layer. This alliance often occurs on very steep slopes and on raised stream banks or terraces. Coast live oak woodland requires sandstone or shale-derived soils, and it grows at elevations between sea level and 4,000 feet (Sawyer et al. 2009). Important tree canopy associates of Coast live oak woodland within the survey area include California sycamore (*Platanus racemosa*) and southern California black walnut (*Juglans californica* var. *californica* [special-status]). Ornamental trees were also observed along the road sides. Native shrubs observed growing below the oak canopy include greenbark ceanothus (*Ceanothus spinosus*), toyon (*Heteromeles arbutifolia*), California sagebrush (*Artemisia californica*), bigpod ceanothus (*Ceanothus megacarpus*), mountain mahogany (*Cercocarpus betuloides*), and lemonadeberry (*Rhus integrifolia*). The associate native trees and shrubs are sparse. Coast live oak woodland within the survey area is relatively disturbed, as camp facilities and structures have been developed over the history of the camp below and between the trees of this plant community. Ground cover beneath coast Live oak woodland is comprised largely of mowed annual grasses which cover previously disturbed ground surrounding camp buildings.

California Sycamore Woodland (PC2) (*Platanus racemosa* Woodland Alliance) is dominated by *Platanus racemosa*, which is a winter-deciduous tree. This alliance is characterized by a thicket of evergreen and deciduous shrubs and other lower-growing trees (less than 100-feet in height). *Platanus racemosa* occurs as a widely spaced to intermittent canopy, and the ground layer is generally sparse. California sycamore grows in wetland habitats with soils that are permanently saturated at depth. It is common along fresh water riparian corridors, braided depositional channels of intermittent streams, gullies, springs, seeps, stream and river banks, and terraces adjacent to floodplains subject to high intensity seasonal flooding. This alliance also occurs on upland rocky canyon slopes, in alluvial, open cobbly, and rocky soils, at elevations below 8,000 feet (Sawyer et al. 2009). Associate tree species include coast live oak and southern California black walnut, while coyote brush (*Baccharis pilularis*), mulefat (*Baccharis salicifolia*), and poison oak (*Toxicodendron diversilobum*) are important understory shrubs to the tall emergent sycamores. Arroyo willow (*Salix lasiolepis*) is present with other intergrading upland shrub species such as California sagebrush, birchleaf mountain mahogany, Brewer's big saltbush (*Atriplex lentiformis* ssp. *breweri*), chaparral mallow (*Malacothamnus fasciculatus*), and lemonadeberry.

Giant Coreopsis Scrub (PC3) (*Coreopsis gigantea* Shrubland Alliance) is dominated by *Coreopsis gigantea* in the shrub canopy (Sawyer et al. 2009). This alliance is characterized by scrub greater than 3 feet and less than 15 feet high with an open to intermittent canopy that is two-tiered with an open to intermittent herbaceous layer. This plant community habitat is found on the immediate coast, within 1.25 miles of the ocean on steep bluffs or stable slopes. Giant coreopsis scrub is dominated with other shrubs such as California sagebrush, Australian saltbush (*Atriplex semibaccata*), California bush encelia (*Encelia californica*), coastal prickly pear (*Opuntia littoralis*), lemonade berry, purple sage (*Salvia leucophylla*), and sawtooth goldenbush (*Hazardia squarrosa* var. *grindelioides*).

California Sagebrush-Black Sage Scrub (PC4) (*Artemisia californica*-*Salvia mellifera* Shrubland Alliance), is co-dominated by California sagebrush (*Artemisia californica*) and black sage (*Salvia mellifera*), the two shrubs comprise the majority of the shrub cover (Sawyer et al. 2009). California sagebrush-black sage scrub is generally found on moderate to steep low elevation slopes. The shrubs are less than 6 feet in height are sometimes two-tiered and have an intermittent to continuous canopy. Shrub species also present sporadically in the scrub alliance onsite include laurel sumac (*Malosma laurina*), deerweed (*Lotus scoparius*), our Lord's candle, (*Hesperoyucca whipplei*), and California bush Encelia.

Annual Brome Grassland (PC5) is dominated by ripgut (*Bromus diandrus*) and/or soft chess (*Bromus hordeaceus*) with other non-natives in the herbaceous layer. Sawyer et al. (2009) also refers to this plant community as *Bromus* (*diandrus*, *hordeaceus*) – *Brachypodium distachyon* Semi Natural Herbaceous Stands and describes it as predominantly herbs that grow less than thirty (30) inches tall with intermittent to continuous cover. Emergent trees and shrubs may be present at low cover. This plant community

occurs in all topographic settings in foothills, waste places, and openings in woodlands and ranges from 0 to 7,220 feet in elevation. Annual brome grassland is represented by patches in the northern portion of the survey area below coast live oak woodland. This community is associated with developed and disturbed portions of the survey area.

Developed Areas/Roads (PC6) are comprised of camp facilities present along the Little Sycamore Creek riparian zone and include parking lots and grassy areas surrounding structures, guest cabins and residential buildings, recreation facilities (a swimming pool, basketball and tennis courts and an archery range), dirt roads, administrative buildings and restroom buildings. This built-up area extends the length of the creek, from the toe of the slopes of the western hills to Yerba Buena Road. These areas also include all paved roads and parking areas onsite.

Ornamental-Native Mix (PC7) includes predominantly ornamental landscape plantings, such as eucalyptus, myoporum, oleander, European olive, pine, Peruvian pepper tree, Brazilian pepper tree, and greater periwinkle. Some scattered native shrubs, such as coyote brush, exist in these areas, but do not constitute native habitat by any means.

Locally Important Plant Communities

California Sycamore Woodland (*Platanus racemosa* Alliance) currently has a global ranking of 3 (G3) and a state ranking of 3 (S3) issued by California Department of Fish and Game (CDFG), making it a CDFG Rare plant community (CDFG, September 2010 List). Coast Live Oak Woodland (*Quercus agrifolia* Alliance) is not a CDFG Rare plant community, as it has a rank of G5S4. However, Coast Live Oak Woodlands are protected by the California Oak Woodlands Act and provide significant wildlife habitat and resources vital to several species of local wildlife within the Santa Monica Mountains. Giant Coreopsis Scrub (*Coreopsis gigantea* Alliance) has not been ranked by CDFG; however, this community is a type of coastal sage scrub that has a limited distribution (limited to the Santa Monica Mountains and stabilized dunes of Nipomo and the Channel Islands) and provides quality functional habitat for wildlife onsite as it is situated between the immediate coastal climatic influences and more common habitat inland. Giant Coreopsis Scrub within the survey area is relatively undisturbed with the exception of an existing trail and road dissecting it along the ridgeline to the west of Little Sycamore Canyon Creek. California Sagebrush-Black Sage Scrub (*Artemisia californica-Salvia mellifera* Alliance) is ranked as G4S4, and is not a CDFG Rare plant community; however, this scrub type observed within the survey area is relatively undisturbed and provides quality functional habitat for local wildlife species and contributes to the diversity of habitats locally.

All four plant communities observed within the survey area are within Environmentally Sensitive Habitat Areas, and are considered Locally Important Communities. The communities are important because they exist within the coastal zone and provide significant wildlife habitat and resources vital to many local wildlife species within the Santa Monica Mountains. The coastal zone designates important habitat and serves to provide protective measures for the Santa Monica Mountain's unique coastal resources including plant and animal species.

Critical Habitat

Four U.S. Fish and Wildlife Service Federal Critical Habitats exist within ten (10) miles of the property, including the following:

Plant Community Name	Mile Radius from Project Site
Southern California Steelhead	5
Western Snowy Plover	5
Braunton's Milk-vetch	10
Lyon's Pentachaeta	10

No critical habitat occurs within one mile of the project site, and no critical habitat will be affected by the proposed project. The potential for these species to occur onsite is low to none since no suitable habitat exists onsite for these species.

Environmentally Sensitive Habitat Areas (ESHA)

Environmentally sensitive habitat is defined under Article 2 of the County's Coastal Zoning Ordinance (effective 11/14/2008) 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 harmed by human activities and development, including: Areas of Special Biological Significance as identified by the State Water Resource Control Board; rare and endangered species habitats identified by the State Department of Fish and Game; all coastal wetlands and lagoons; all marine, wildlife, and education and research reserves; nearshore reefs; stream corridors; lakes; tidepools; seacaves; islets and offshore rocks; kelp beds; significant coastal dunes; indigenous dune plant habitats; and wilderness and primitive areas.”

Article 8 of the Ventura County Coastal Zoning Ordinance provides standards and conditions for resource protection. Section 8178-2.4, regarding Specific Standards, contains provisions that apply to all areas of the County's Coastal Zone which fall within the definition of "environmentally sensitive habitat," or within the designated buffer areas around such habitats. Specifically, Section 8178-2.4c(1) with regard to creek corridors, states that:

“All developments on land either in a stream or creek corridor or within 100 feet of such corridor (buffer area), shall be sited and designed to prevent impacts which would significantly degrade riparian habitats, and shall be compatible with the continuance of such habitats.”

Based on these definitions and the habitats existing onsite, all parcels, in which the construction footprint is located, are considered to be ESHA. In addition to many acres of scrub and chaparral habitat, the construction footprint is primarily located within the 100-foot buffer of Little Sycamore Canyon Creek as the entire camp has historically always been in the buffered water body. However, the project has been designed to avoid and prevent impacts that would significantly degrade the creek's Coast Live Oak Woodland and Southern California Sycamore Woodland habitats, and is compatible with the continuance of the riparian habitats. No permanent impacts to ESHA are expected to occur with the installation of the wastewater treatment system.

Physical Features

No unique physical features were observed onsite, except Little Sycamore Canyon Creek, which is discussed in detail in the following Waters and Wetlands Section below.

Waters and Wetlands

See Appendix One for an overview of the local, state and federal regulations protecting waters, wetlands and riparian habitats. Wetlands are complex systems; delineating their specific boundaries, functions and values generally takes a level of effort beyond the scope of an Initial Study Biological Assessment (ISBA). The goal of the ISBA with regard to waters and wetlands is simply to identify whether they may exist or not and to determine the potential for impacts to them from the proposed project. This much information can be adequate for designing projects to avoid impacts to waters and wetlands. Additional studies are generally warranted to delineate specific wetland boundaries and to develop recommendations for impact minimization or impact mitigation measures.

Waters and/or wetlands were found within the survey area(s).

Waters and Wetlands Summary

Little Sycamore Canyon Creek (LSCC) dissects the easternmost two lots of the subject parcel/survey area, flowing along a north-south trajectory for the length of the lots. The habitat occupying the creek is California Sycamore Woodland, and is significantly influenced by the camp facilities, including an existing paved road and walking trails that traverse and cross the creek several times. The riparian woodland within the survey area is relatively disturbed but has maintained many native riparian plant species. No wetland buffer currently exists with respect to existing facilities (i.e., structures and the road). LSCC is classified and mapped by the National Wetlands Inventory (NWI) as Freshwater Forested/Shrub Wetland, and five (5) Riverine tributary waterways (ephemeral drainages) are mapped by the NWI within 500 feet of the construction footprint. Since the confluences of these drainages and their respective 100-foot buffers lie within 100 feet of the riparian vegetation associated with LSCC, these drainages are discussed collectively in the table below and in Figure 3.

The project will avoid and minimize direct and indirect impacts to the waters/wetlands associated with LSCC. Wastewater would be transferred from Middle to Lower Camp via a 4-inch and 6-inch sewer gravity line that will be installed within/immediately adjacent to the existing road. The pipeline will span the creek on the existing bridge structures. As noted and illustrated above in Section 1, all areas where the pipeline will cross the creek via bridges have been designed to completely avoid the top of the banks of the creek and will not lead to any destabilization of the creek banks. The pipeline, pumps, and man-holes will encroach within the County’s typical 100-foot wetland buffer. Due to current and historic land uses, the minimal level of temporary ground disturbance associated with the proposed project, and the existing development within the County-required 100-foot wetland buffer, no additional buffer is necessary to protect the current creek functions. The project will avoid direct and indirect impacts to all other waters and/or wetlands within 500 feet of the project site.

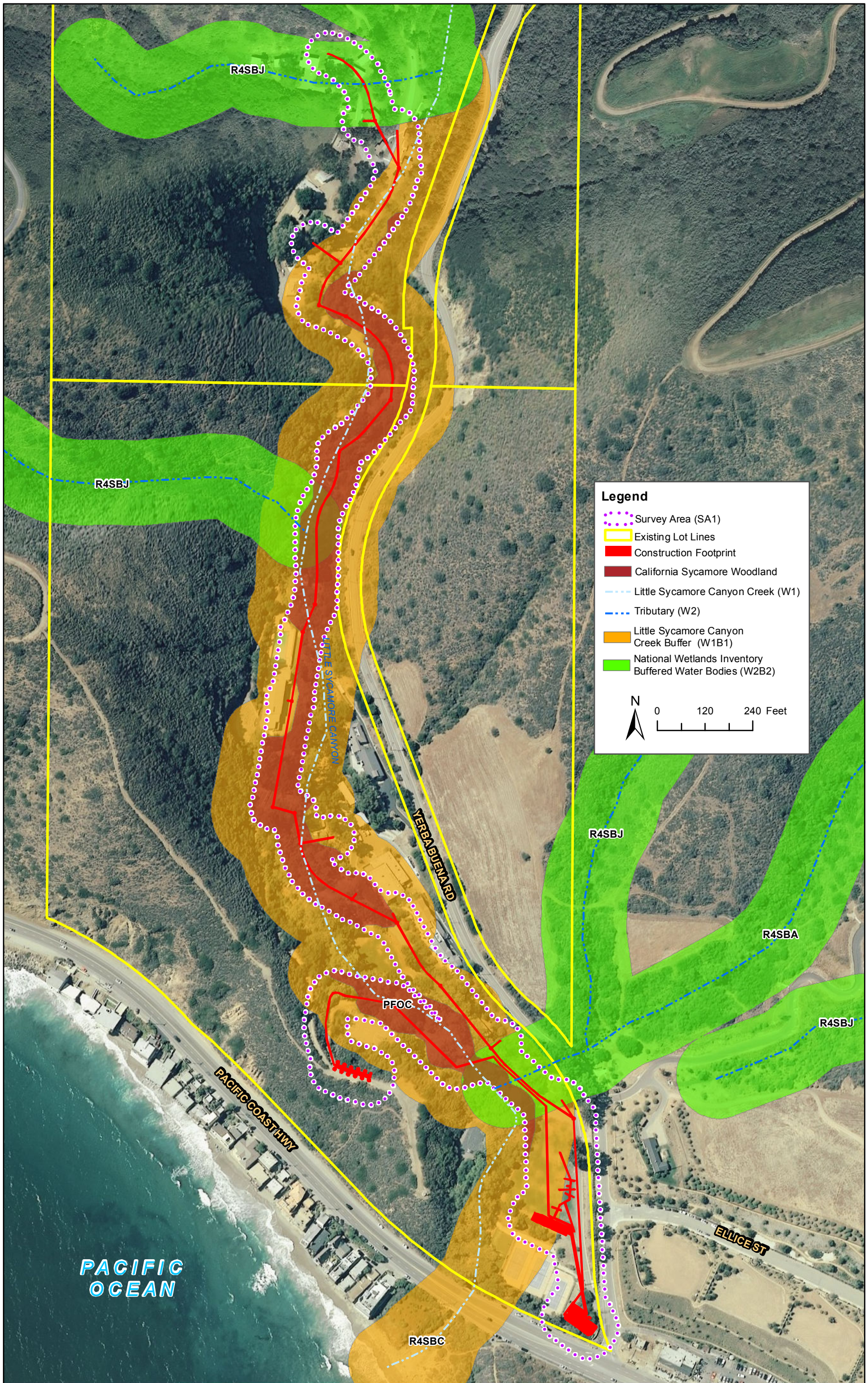
Waters and Wetlands Table

Waters and Wetlands						
Map Key	Wetland Type	Wetland Name	Wetland Status	Wetland Size	Hydrologic Status	Primary Water Source
W1	Stream	Little Sycamore Canyon Creek	Likely USACE, CDFG, County, WPD	0.75 mile or 3,690 linear ft onsite, reach is ~4.8 mile	Flowing	Runoff
W2	Unnamed tributaries (NWI Buffered Water Bodies)	Unnamed	None	-	Ephemeral	Rainfall

USACEU.S. Army Corps of Engineers regulated
 CDFG.....California Department of Fish & Game regulated
 CountyCounty General Plan protected wetland
 WPDCo. Watershed Protection District (red-line stream)

Waters and Wetlands (continued)			
Map Key	County Wetland Significance	Wetland Distance from Project	Comments
W1	Significant	Within construction footprint	Little Sycamore Canyon Creek contains healthy, moderately disturbed riparian habitat. An existing road traverses the creek and existing structures are within 25 feet of the creek.
W2	Not significant	Within 500 feet of construction footprint	Five ephemeral drainages mapped by the National Wetland Inventory within 500 feet of the proposed project.

Water/Wetland Buffers		
Map Key	Recommended Buffer	Comments
W1B1	N/A	Due to current and historic land uses, the minimal level of construction associated with the proposed project and the existing encroachment within the County-required 100-foot setback buffer, no buffer is necessary to protect the current creek functions.
W2B2	N/A	Due to current and historic land uses, the minimal level of construction associated with the proposed project and the existing encroachment within the County-required 100-foot setback buffer, no buffer is necessary to protect the current functions of the creeks.



Legend

- Survey Area (SA1)
- Existing Lot Lines
- Construction Footprint
- California Sycamore Woodland
- Little Sycamore Canyon Creek (W1)
- Tributary (W2)
- Little Sycamore Canyon Creek Buffer (W1B1)
- National Wetlands Inventory Buffered Water Bodies (W2B2)

N
0 120 240 Feet

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Waters and Wetlands Map

Figure 3
Camp Hess Kramer



3.2 Species

Observed Species

A total of 97 plant species were observed onsite, including 60 (62%) native species and 37 (38%) non-native (introduced) species. A total of 16 wildlife species were observed or detected onsite during the survey, including 2 reptiles, 12 birds, and 2 mammals. All of the animal species observed/detected are native or common species. See Appendix Two for a list of species observed onsite during the survey.

Protected Trees

Numerous coast live oak, California sycamore, southern California black walnut, and other protected tree species are present within the survey area. No tree inventory has been conducted for this project, since the project will be field fitted to avoid trees to the maximum extent. Per the County's Non-Coastal Development Zoning Ordinance Sec. 8107-25 (Tree Protection Regulations), single-trunk oak trees with a minimum girth of 9.5 inches are qualified for protection. Sec. 8107-25.3 (General Requirements) states that "No person shall alter, fell, or remove a Protected Tree except in accordance with the provisions of Section 8107-25 et seq. If tree alteration, felling, or removal is part of a project requiring a discretionary permit, then the tree permit application and approval process may accompany the parent project discretionary permit."

Endangered, Threatened, Rare, and Locally Important Species and Nests (Initial Study Checklist A & E)

See Appendix One for definitions of the types of special status species that have federal, state or local protection and for more information on the regulations that protect birds' nests.

Endangered, threatened, rare, or locally important species were observed or have a moderate to high potential to occur within the survey area(s).

Habitat suitable for nests of birds protected under the Migratory Bird Treaty Act does exist within the survey area(s).

Special-Status Species Summary

A review of BIOS identified more than twenty (20) biological reports within the vicinity of the survey area ranging in dates from 1999 to 2009. The three most recent reports completed within the last five years for projects occurring within one (1) mile of the CUP area were reviewed and are summarized below:

1. A report completed in 2007 for grading and development of a single family residence located less than one quarter mile from Camp Hess Kramer determined that Catalina mariposa lily (*Calochortus catalinae*) and western dichondra (*Dichondra occidentalis*), sensitive species at that time, were present onsite. Potential habitat for Plummer's mariposa lily (*Calochortus plummerae*) and Orcutt's pincushion (*Chaenactis glabriuscula* var. *orcuttiana*) were documented as present onsite. Disturbance to 3.54 acres of mixed scrub, 0.38 acre of disturbed mixed scrub, 0.22 acre of disturbed native grassland and 0.06 acre of ruderal vegetation and 0.75 acre of existing dirt roads were proposed for the project. The site had already experienced substantial disturbance due to grading activities prior to evaluation.
2. A report completed in 1999 for a single family residence approximately 0.8 miles northwest of the CUP area determined that marginal habitat was present for several special-status plant species including Santa Susana tarplant (*Deinandra minthornii*), Conejo buckwheat (*Eriogonum crocatum*), Marcescent dudleya (*Dudleya cymosa* ssp. *marcescens*), Plummer's mariposa lily (*Calochortus plummerae*), Conejo buckwheat (*Eriogonum crocatum*), Lyon's pentachaeta (*Pentachaeta lyonii*), and chaparral ragwort (*Senecio aphanactis*). Bigpod ceanothus chaparral, coastal sage scrub, and grassland habitats were documented onsite.
3. A report was prepared in 2003 for a project located approximately 1 mile north of the CUP area. This project included development of a new residence within relatively undisturbed habitat. However, following the review of the Initial Study Checklist and modifications to the proposed construction footprint a Negative Declaration was made regarding the potential for impacts for this project.

No special-status species were observed during the field survey. However, the survey was conducted during a time of year when the presence of special-status plant species may not have been evident. In addition, the potential for special-status wildlife to occur onsite is based solely on habitat suitability analysis.

The literature search and CNDDDB 10-mile radius search identified 24 special-status plant species and 30 special-status animal species with potential to occur onsite. Only those species (1) tracked within 5 miles of the project site by CNDDDB, (2) have a moderate to high potential to occur onsite based on the presence of suitable habitat, and/or (3) are identified in reports as occurring at project sites less than 1 mile from the survey area (including Catalina mariposa lily and southern California black walnut) are analyzed in the tables below. Using these criteria, the tables below include 9 plant species and 8 wildlife species of the greater CNDDDB 10-mile search (Attachment A). Of these, 3 plant species and 4 animal species have a moderate to high potential to occur, were observed onsite, and/or are reported by the Applicant as present onsite. None of these 7 species are federally or state listed as endangered, threatened, or rare. No listed species are expected to occupy the habitats within the survey area.

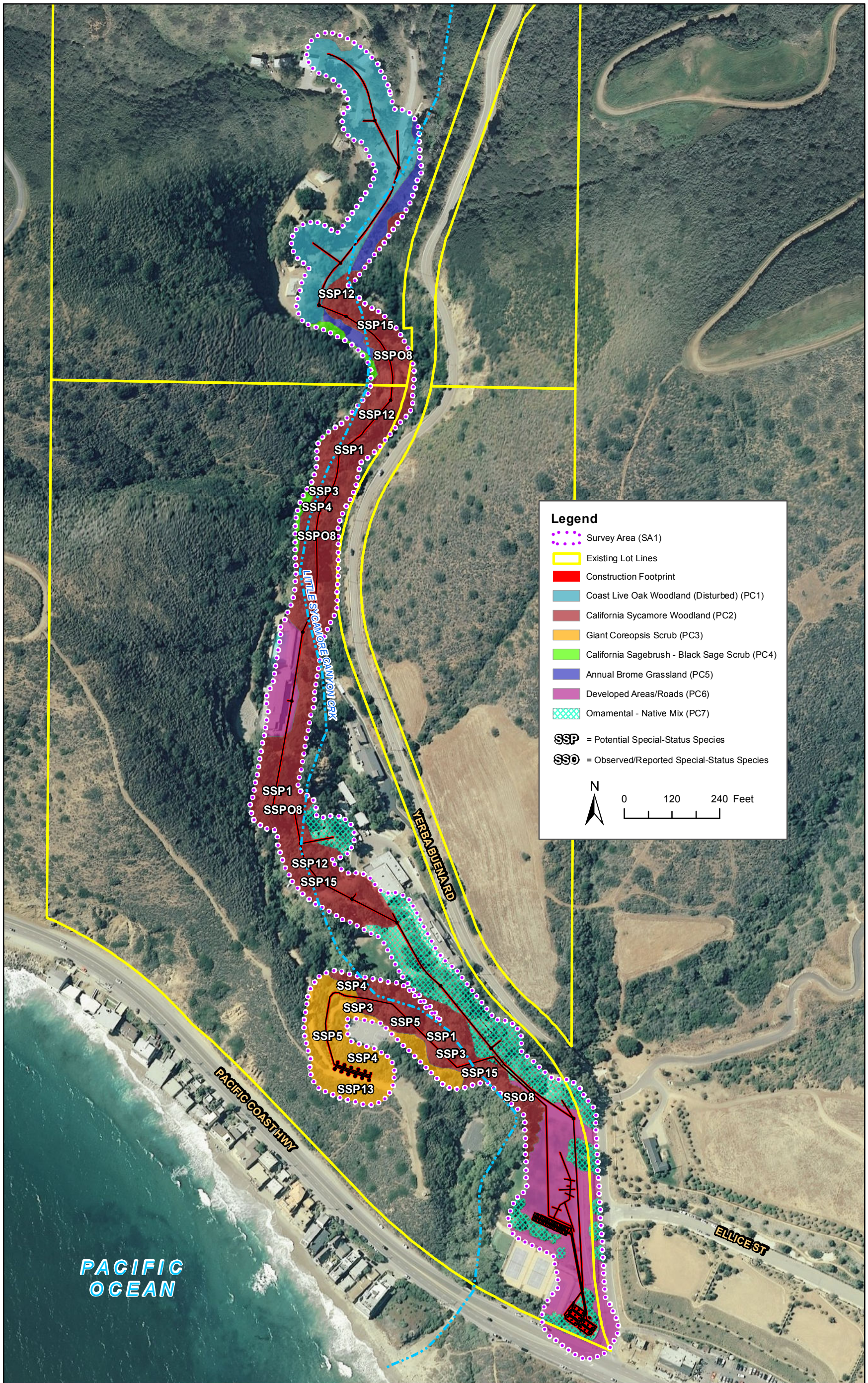
One special-status plant species was observed onsite: southern California black walnut trees were observed scatter along the creek corridor. One special-status wildlife species is reported onsite by the Applicant and tracked by CNDDDB onsite: overwintering roosts of monarch butterfly are reported in the California Sycamore Woodland (PC2 on Figure 2) onsite. A known overwintering roost is reported within the entire length of the survey area along Little Sycamore Canyon Creek by CNDDDB. The CNDDDB has tracked data from this roost site since 1986 and reports that up to 10,000 monarchs have been observed roosting along Little Sycamore Canyon Creek.

Of the species analyzed in the tables below, only those species that were observed/reported onsite or have a moderate to high potential to occur onsite are mapped on the Species Map (Figure 4). Attachment A details the California Natural Diversity Database (CNDDDB)-tracked species (point occurrences) that have been documented within 10 miles of the project boundaries.

Special-Status Species						
Map Key	Survey/Source	Scientific Name	Common Name	Species Status	Potential To Occur	Required Habitat
SSP1	CNDDDB	<i>Accipiter cooperii</i>	Cooper's hawk	G5/S3, WL	Moderate	Woodland, chiefly of open, interrupted or marginal type. Nest sites mainly in riparian growths of deciduous trees, as in canyon bottoms on river flood-plains; also, live oaks.
SSP2	CNDDDB	<i>Aquila chrysaetos</i>	Golden eagle	G5/S3, FP/WL	Low	Rolling foothills, mountain areas, sage-juniper flats, & desert. Cliff-walled canyons provide nesting habitat in most parts of range; also, large trees in open areas.
SSP3	CNDDDB	<i>Aspidoscelis tigris stejnegeri</i>	Coastal whiptail	G5T3T4/S2S3	Moderate	Found in deserts & semiarid areas with sparse vegetation and open areas. Also found in woodland & riparian areas. Ground may be firm soil, sandy, or rocky.
SSP4	David Magney Environmental Consulting, 2009	<i>Calochortus catalinae</i>	Catalina mariposa lily	G3/S3.2, CNPS 4	Moderate	Valley and foothill grassland, chaparral, coastal scrub, cismontane woodland. Heavy soil, open grassland or shrubland: <2,300 ft.
SSP5	CNDDDB	<i>Calochortus plummerae</i>	Plummer's mariposa-lily	CNPS 1B, LIS	Moderate	Coastal scrub, chaparral, grassland, cismontane woodland, lower montane coniferous forest. Rocky sandy sites, granitic or alluvial material. Common after fire. 300-5,300 ft.

Special-Status Species						
Map Key	Survey/Source	Scientific Name	Common Name	Species Status	Potential To Occur	Required Habitat
SSP6	CNDDDB	<i>Chaenactis glabriuscula</i> var. <i>orcuttiana</i>	Orcutt's pincushion	G5T1/S1, CNPS 1B	None	Coastal bluff scrub, coastal dunes. Sandy sites. 10-330 ft.
SSP7	CNDDDB	<i>Coelus globosus</i>	globose dune beetle	G1/S1	None	Inhabitant of coastal sand dune habitat, from bodega head in Sonoma County south to Ensenada, Mexico. Inhabits foredunes and sand hummocks.
SSO8	CNDDDB, Reported present by Property Director of Construction & Facilities	<i>Danaus plexippus</i>	Monarch butterfly	G5/S3	Overwintering roosts reported onsite by Applicant within the California Sycamore Woodland	Winter roost sites extend along coast from northern Mendocino to Baja California, Mexico. Roosts located in wind-protected tree groves (eucalyptus, Monterey pine, cypress), with nectar/water sources nearby.
SSP9	CNDDDB	<i>Deinandra minthornii</i>	Santa Susana tarplant	SR, G2/S2.2, CNPS 1B	None	Chaparral, coastal scrub. On sandstone outcrops and crevices, in shrubland. 900-2,500 ft.
SSP10	CNDDDB	<i>Dudleya cymosa</i> ssp. <i>marcescens</i>	Marcescent dudleya	FT, SR, G5T2/S2.2, CNPS 1B	None	Chaparral. On sheer rock surfaces & rocky volcanic cliffs. 600-1,700 ft.
SSP11	CNDDDB	<i>Dudleya cymosa</i> ssp. <i>ovatifolia</i>	Santa Monica dudleya	FT, G5T2/S2.2, CNPS 1B	Low	Chaparral, coastal scrub. In canyons on sedimentary conglomerates; north facing slopes. 700-1,700 ft.
SSO12	Site Assessment 3/10/2011	<i>Juglans californica</i> var. <i>californica</i>	SoCal black walnut	G3/S3.2, CNPS 4	Observed throughout survey area	Chaparral, coastal scrub, cismontane woodland. Slopes and riparian areas; 50-900 m.
SSP13	CNDDDB	<i>Navarretia ojaiensis</i>	Ojai navarretia	G1/S1, CNPS 1B	Moderate	Chaparral, coastal scrub, valley and foothill grassland. Openings in shrublands, grasslands. 900-2,000 ft.
SSP14	CNDDDB	<i>Oncorhynchus mykiss irideus</i>	Southern steelhead - southern California ESU	FE, G5T2Q/S2, SC	Low	Populations from Santa Maria River south to southern extent of range (San Mateo Creek in San Diego Co.). Southern steelhead likely have greater physiological tolerances to warmer water & more variable conditions.
SSP15	CNDDDB	<i>Thamnophis hammondi</i>	two-striped garter snake	G3/S2, SC	Moderate	Coastal California from vicinity of Salinas to northwest Baja California. From sea to about 7,000 ft elevation. Highly aquatic, found in or near permanent fresh water. Along streams, rocky beds, riparian growth.
SSP16	CNDDDB	<i>Thelypteris puberula</i> var. <i>sonorensis</i>	Sonoran maiden fern	G5T3/S2.2?, CNPS 2	Low	Meadows and seeps. Along streams, seepages. 150-1,800 ft.
SSP17	CNDDDB	<i>Vireo bellii pusillus</i>	Least Bell's vireo	FE, SE G5T2/S2	Low	Summer resident of southern California in low riparian in vicinity of water or in dry river bottoms; below 2000 ft. Nests placed along margins of bushes or on twigs projecting onto pathways, usually willow, baccharis, and mesquite.

Special-Status Species (Continued)					
Map Key	Species Scientific Name	Adequate Habitat Onsite	Adequate Habitat Size	Acreage Impacted	Comments
SSP1	<i>Accipiter cooperii</i>	Yes	Yes	0	Tracked within 10 miles of the proposed project. Nesting habitat is present within the riparian woodland habitat throughout survey area.



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 Basemap Source: Penfield and Smith, November 6, 2010.

Species Map

Figure 4
Camp Hess Kramer

3.3 Wildlife Movement and Connectivity (Initial Study Checklist D)

Wildlife movement or connectivity features, or evidence thereof, were found within the survey area(s).

Mapped Corridors or Linkages

No regional wildlife linkages or corridors are mapped within or near the property.

Connectivity Feature 1 (C1)

On a local scale, the primary connectivity feature within the survey area is Little Sycamore Canyon Creek (LSCC). The overall habitat quality within the survey area is relatively disturbed as compared to the upper reaches of LSCC due to human influences. Species richness and structural diversity is moderate, although this corridor is likely used by a variety of common wildlife species for local movement as well as for nesting and food resources. LSCC likely provides somewhat limited connectivity to habitats of the surrounding Santa Monica Mountain National Forest, as it is situated at the southernmost end of the canyon, within approximately 400 feet of the Pacific Ocean. However, LSCC provides a corridor of movement for animals to use the general wildlife habitats along the length of the creek, and to allow for cover while moving from upland habitats north of the study area to the upland habitats adjacent to the study area.

Description

LSCC and its riparian habitat may provide corridors or routes that animals use when traveling between adjacent habitats and the project site.

Functional Group/Species Expected

Functional groups expected to utilize LSCC include: large mammals such as mule deer (*Odocoileus hemionus californica*), medium mammals such as coyote (*Canis latrans*), common passerine birds that may utilize the riparian tree and shrub habitat such as Anna's hummingbirds (*Calypte anna*) and western scrub jays (*Aphelocoma californica*), and aquatic/riparian reptiles and amphibians such as two striped garter (*Thamnophis hammondi*) and Pacific tree frog (*Pseudacris regilla*).

Habitats Connected

LSCC connects the developed low elevation coastal habitat along Highway 101 and Yerba Buena Road to upland and mountains habitat within the Santa Monica Mountain National Forest.

Connectivity Feature 2 (C2)

Locally, the ridgeline located west of the construction footprint/survey area also is a connectivity feature.

Description

This ridgeline is likely used as a corridor or route by wildlife when traveling between adjacent habitats.

Functional Group/Species Expected

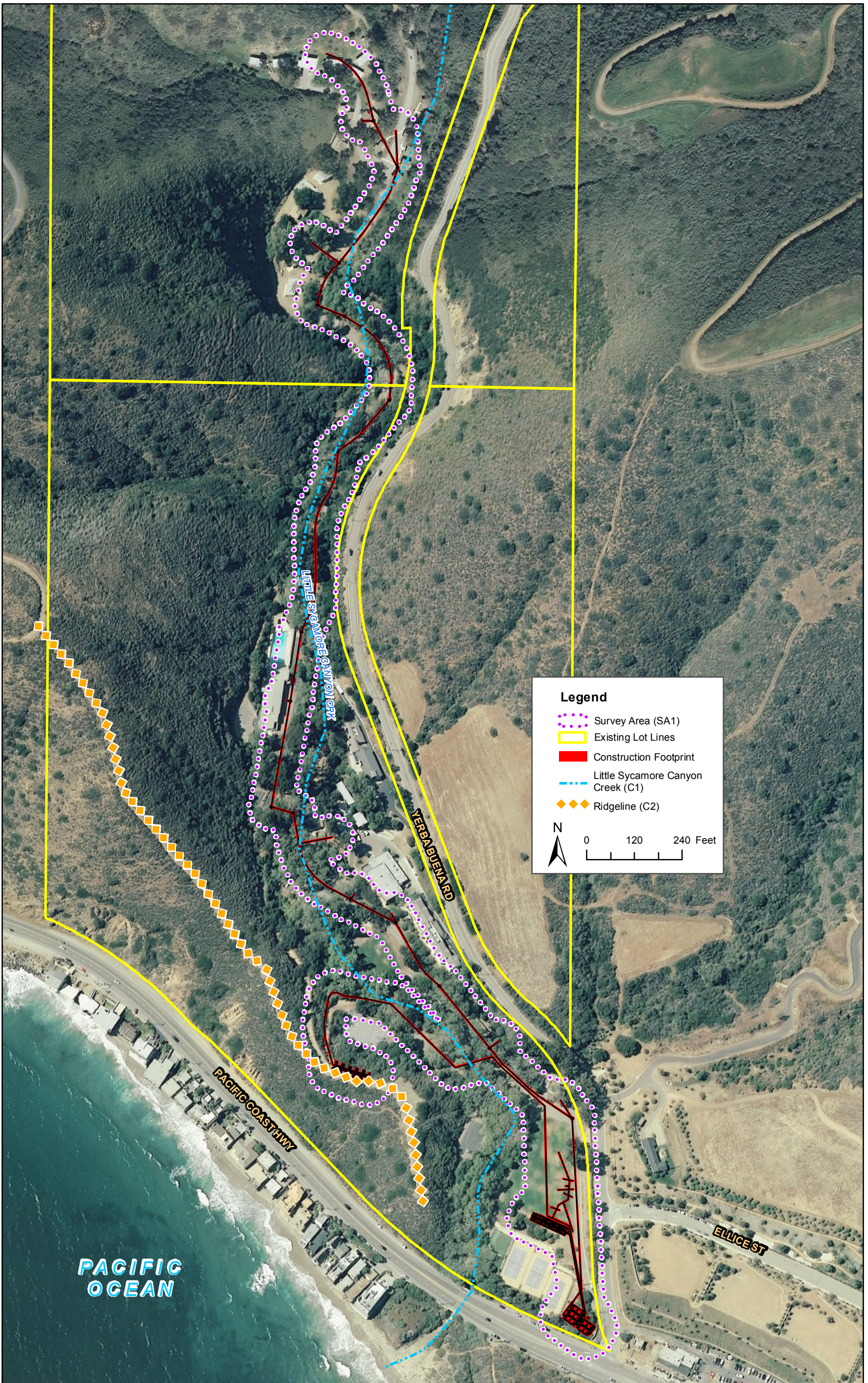
Functional groups expected to utilize the ridgeline: mammals such as mule deer (*Odocoileus hemionus californica*) and coyote (*Canis latrans*).

Habitats Connected

Habitat from neighboring properties and coastal to inland habitat.

Crossing Structures and Connectivity Barriers

Historic and existing camp facilities include paved roads and foot-trails that cross LSCC. No new or additional bridges or crossing structures are proposed for this project. Camp Hess Kramer's facilities are a historic and existing connectivity barrier for wildlife using Little Sycamore Canyon Creek. No new or additional permanent barriers to wildlife are proposed as part of the subject project.



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Basemap Source: Penfield and Smith, November 6, 2010.

Local Wildlife Connectivity

Figure 5
Camp Hess Kramer

Section 4: Recommended Impact Assessment & Mitigation

4.1 Sufficiency of Biological Data

Additional information needed to make CEQA findings and develop mitigation measures:
No

Additional biology-related surveys or permits needed prior to issuance of land use permit:
None Expected

Impacts resulting from the proposed installation of the OWTS are temporary in nature. The OWTS will be field fitted during construction to avoid and minimize impacts to the maximum extent. Trenches for the pipeline are located within existing roads and trails to reduce and avoid impacts to Little Sycamore Canyon Creek and other sensitive habitats/ESHA. Following the installation of OWTS, trenches and holes will be covered and returned to road/trail status.

The site visit occurred during a time of year when the presence of special-status plant species may not have been evident. However, no impacts to native vegetation are expected to result from the installation of the OWTS; therefore, no rare plants are expected to be impacted, and rare plant surveys are not necessary to make CEQA findings or determine mitigation.

No tree inventory has been conducted for this project; however, the alignment of the OWTS is proposed in a path of least resistance with regard to protected trees, and the alignment can be modified (field fitted) if necessary during construction to avoid areas with extensive tree root systems or large tree roots. No significant impacts to protected trees are expected as a result of the proposed project.

4.2 Impacts and Mitigation

A. Endangered, Threatened, or Rare Animal or Plant Species, or Their Habitats

Project: PS-M; Cumulative: LS

No **federal or state listed** endangered, threatened, or rare **plant or animal species** were observed onsite; and no listed species tracked within 10 miles of the project site have a moderate or high potential to occur onsite; therefore, no impacts to listed animal species are expected to result from the proposed project.

It is likely that **birds** that are protected by the California Fish and Game Code and the federal Migratory Bird Treaty Act nest onsite. Several bird species were observed foraging within and adjacent to the survey area. The OWTS alignment follows woodland and riparian habitat along Little Sycamore Canyon Creek where suitable nesting habitat is present. Although no trees or vegetation are proposed to be removed for this project, indirect effects of the installation of the proposed project, including noise, presence of equipment, increased human activities, and dust associated with trenching may result in modifications of breeding activities and nesting if the project is conducted during the nesting season.

Significance Finding – Project Impacts: Project impacts to federally or state listed species are considered less than significant. Project impacts to nesting birds are considered potentially significant but mitigable.

Significance Finding – Cumulative Impacts: Cumulative impacts to federally or state listed species and nesting birds are considered less than significant.

Avoidance and Minimization Measures

To avoid direct and indirect impacts to nesting birds, development of the site should be conducted outside of the bird breeding season (February 1 - August 31). The following mitigation measure addresses potential impacts to nesting birds if construction is conducted during the nesting season.

MM1: Nesting Bird Surveys and Buffers

Mitigation Goal:

The goal is to reduce direct project impacts to protected nesting birds to a less than significant level.

Mitigation Action:

Grading and the initiation of construction shall either: a) take place outside of the bird nesting season (February 1 to August 31), or b) be subject to bird survey requirements. If development is proposed within nesting habitat and within the breeding season, pre-construction bird nesting surveys shall be conducted to determine the locations of nesting birds. Bird survey requirements include a nesting bird survey to be conducted by a qualified biologist no more than two weeks prior to the start of grading or construction. If a nesting bird or special-status species is located, consultation with the local CDFG representative shall occur to determine what avoidance actions may be taken. Generally, if an active bird nests is found, an approximate 30-100-foot buffer surrounding the nest(s) shall be flagged for avoidance. If any active raptor nests are found, typically a suitable buffer area of 250-500 feet from the nest shall be established until the nest becomes inactive (vacated). Disturbance can occur within the buffer area after the birds are no longer reliant on the nest.

Monitoring & Timing:

Bird surveys are required only for the start of grading or construction within the bird nesting season (February 1 to August 31). Surveys shall be conducted no more than two weeks prior to site disturbance.

Standard of Success:

Success of this mitigation measure would be the avoidance of work during the bird nesting season, or conducting nesting bird surveys to avoid indirect impacts to nesting birds, and/or establishing buffers around active nests in close proximity to the construction activities, to minimize indirect impacts to nesting birds. Implementation of this mitigation measure would reduce impacts to a less than significant level.

B. Wetland Habitats

Project: LS; Cumulative: LS

Little Sycamore Canyon Creek is mapped by the National Wetlands Inventory (NWI) as a Freshwater Forested/Shrub Wetland. The portion of Little Sycamore Canyon Creek where the OWTS installation is proposed has been significantly influenced by the camp facilities historically, including an existing paved road and walking trails that traverse and cross the creek several times. Five (5) Riverine tributary waterways (ephemeral drainages) mapped by the NWI exist within 500 feet of the construction footprint.

The project will avoid direct impacts to the waters/wetlands associated with Little Sycamore Canyon Creek. Wastewater would be transferred from Middle to Lower Camp via a 4-inch and 6-inch sewer gravity line that will be installed within/immediately adjacent to the existing road and trails. The pipeline will span the creek on the existing bridge structures. As noted and illustrated above in Section 1, all areas where the pipeline will cross the creek via bridges have been designed to completely avoid the top of the banks of the creek and will not lead to any destabilization of the creek banks. All manholes and pumps will be set back outside of the creek banks to avoid any impacts to the banks. No riparian habitat or bed and banks will be affected during construction. Any inadvertent indirect impacts associated with the construction activities (i.e. erosion of excavated materials or spills/leaks from equipment) adjacent to the bed and banks of Little Sycamore Canyon Creek would be minimal. In addition, the small amount of

material associated with the equipment being operated for trench excavation (small backhoe/Bobcat) can easily be replaced back in the trench as work progresses, and could easily be cleaned up, if necessary. As such, the extent of any inadvertent indirect impacts, if they occurred, would be considered less than significant.

Significance Finding – Project Impacts: Project inadvertent impacts to wetland habitats are considered less than significant.

Significance Finding – Cumulative Impacts: Potential cumulative impacts wetland habitats are considered less than significant.

C. Coastal Habitats

Project: LS; Cumulative: LS

The project site is located within the coastal zone

The entire property is located within the coastal zone, all of which is likely considered ESHA. All natural, native habitats onsite are considered sensitive coastal habitats. The project site is within the 100-foot buffer of Little Sycamore Canyon Creek, also considered ESHA. The entire camp has historically always been located within the buffered water body; however, the project has been designed to avoid and prevent impacts that would significantly degrade the creek's riparian coastal habitats (Coast Live Oak Woodland and Southern California Sycamore Woodland) and the upland coastal habitats (Giant Coreopsis Scrub and California Sagebrush-Black Sage Scrub).

The proposed location for the settlement, recirculation, and dosing tanks in the far southern end of the property contains vegetation consisting of predominantly ornamental tree and shrub species (PC7 on Figure 2). A few scattered native shrubs exist within this southern-most area, but are located only along the outer edge along PCH below and emerging out of a canopy of ornamental trees and shrubs. These few individual native shrubs in PC7 in the southern-most portion of the property will be avoided during implementation, as the settlement, recirculation, and dosing tanks are proposed only within ornamental vegetation further away from the road and the remnant native shrubs. The project will be field-fitted to avoid all native vegetation.

The project is compatible with the continuance of the riparian and coastal sage scrub habitats. In addition, all activities associated with the construction of the OWST within existing roads and trails are temporary. The project will be field fitted during construction and OWTS installation to avoid any impacts to coastal habitats; therefore, impacts to coastal habitats, including ESHA, are considered less than significant.

Significance Finding – Project Impacts: Project impact to coastal habitats, including ESHA, is a less than significant impact.

Significance Finding – Cumulative Impacts: Cumulative impact to coastal habitats, including ESHA, is a less than significant impact.

D. Wildlife Movement and Connectivity (migration corridors)

Project: LS; Cumulative: LS

On a regional scale, no regional wildlife corridor or linkages are located within the survey area. The entire survey area is general open space/wildlife habitat, and although connectivity features exist onsite, none of them are used by local wildlife specifically to access distinct unique habitat patches or separate resources.

Significance Finding – Project Impacts: Project impacts to regional and local wildlife movement and connectivity are considered less than significant.

Significance Finding – Cumulative Impacts: The cumulative impact to the regional and local wildlife movement and connectivity is considered less than significant.

No locally important **plant species** were observed onsite, however, four locally important plant species have a moderate potential to occur onsite or were observed onsite, including Catalina mariposa lily (CNPS 4), Plummer's mariposa lily (CNPS 1B and Ventura County Locally Important Plant), southern California black walnut (CNPS 4, observed), and Ojai navarretia (CNPS 1B). The presence of these and other potential locally important plant species onsite has not been confirmed at this time. The timing of the survey (winter) was outside of the blooming period for most special-status plant species. No seasonal rare plant surveys have been performed to date within the subject project site. However, no impacts to natural vegetation are proposed as part of this project. The project will be field fitted during construction to avoid all natural habitats; therefore, no impacts to locally important plant species are expected. Impacts to locally important plant species is considered less than significant.

No locally important **animal species** were observed onsite; however, four locally important animals have a moderate potential to occur onsite based on suitable habitat, or are reported as occurring onsite, including: Cooper's hawk, coastal whiptail, two-striped garter snake, and monarch butterfly (also reported by Applicant). No impacts to Cooper's hawk, coastal whiptail, or two-striped garter snake are expected to result from the proposed project; however, a monarch butterfly overwintering roost site is reported within the entire survey area within Little Sycamore Canyon Creek. The CNDDDB has tracked data from this roost site since 1986 and reports that up to 10,000 monarchs have been observed roosting along Little Sycamore Canyon Creek. Tree species comprising the roost within the property include eucalyptus, coast live oak, California sycamore, and ornamental trees. These trees also occur within the survey area; however, no trees are proposed to be removed or trimmed for the installation of the OWTS. Therefore, the monarch butterfly wintering roost site will not be directly impacted as a result of the proposed project; however, the project may indirectly affect the roost site, especially if they migrate north into the survey area. Potential indirect impacts to monarch overwintering sites are considered potentially significant but mitigable.

All four **communities** observed within the survey area are considered locally important communities. The communities are important because they exist within the coastal zone, are considered Environmentally Sensitive Habitat Areas, and provide significant wildlife habitat and resources vital to many local wildlife species within the Santa Monica Mountains. The coastal zone designates important habitat and serves to provide protective measures for the Santa Monica Mountain's unique coastal resources including plant and animal species. However, all activities associated with the construction of the OWST within existing roads and trails are temporary, and the project will be field fitted during construction and OWTS installation to avoid any impacts to locally important communities. Therefore, impacts to locally important communities are considered less than significant.

Several native **protected tree species** are present within the survey area, including coast live oak, California sycamore, and southern California black walnut. Per the County's Non-Coastal Development Zoning Ordinance Sec. 8107-25.5c (Minimum Requirements for Tree Alteration, Felling or Removal Without a Tree Permit) states that alteration, felling or removal of Protected Trees may occur without a Tree Permit under certain circumstances, such as the following: "Pruning and trimming of living limbs and roots, each of which is less than 20% of the tree trunk's girth, provided such trimming does not endanger the life of the tree, result in an imbalance in structure, or remove more than 20% of its canopy or the root system." No individual tree is proposed to be removed as part of the proposed project; however, protected trees may be indirectly affected by root damage if greater than 20% of the root system of each tree is affected as a result of trenching associated with the installation of the OWTS. Although the project will be field fitted during construction to avoid impacts to protected trees, potential inadvertent or unavoidable impacts to protected trees resulting from the project are considered potentially significant but mitigable.

Significance Finding – Project Impacts: Potential project impacts to locally important plant species or communities are considered less than significant. Potential project impacts to monarch butterfly overwintering roost sites are considered potentially significant but mitigable. Potential inadvertent or

unavoidable impacts to protected trees during construction are considered potentially significant but mitigable.

Significance Finding – Cumulative Impacts: Cumulative impacts to locally important species, locally important communities, or protected trees are considered less than significant.

Avoidance and Minimization Measures

The project will be field fitted to avoid impacts to monarch butterfly overwintering roosts (aggregations) and protected trees. To avoid impacts to monarch overwintering sites, construction should be avoided during the peak winter migration period (December / January). MM2 shall also be implemented to minimize impacts to monarch roosts.

MM2: Monarch Butterfly Winter Roost Site Surveys

Mitigation Goal:

The goal is to minimize indirect project impacts to monarch butterfly while roosting at the overwintering site.

Mitigation Action:

To minimize indirect impacts to the known monarch butterfly overwintering roost site along and within the Little Sycamore Canyon Creek corridor and to monarch butterflies, project construction/implementation shall be conducted outside of the overwintering aggregation period (typically October through February). If the overwintering period cannot be avoided, then prior to the start of construction/implementation, a qualified biologist shall survey the entire survey area, which is known to contain monarch overwintering habitat, to determine presence or absence of overwintering aggregations. If no aggregations are observed and no aggregation initiation activities are observed, no further action or mitigation is required. If aggregations or aggregation activities are observed during the surveys, construction within 100 feet of any areas containing overwintering aggregations or aggregation activity shall be prohibited from October to February, and/or when the monarch aggregations are present.

Monitoring & Timing:

If construction is to be conducted during the overwintering period, a qualified biologist will conduct preconstruction surveys no more than one week prior to construction commencement. If aggregations are present, a qualified biologist shall monitor the roost sites, during construction within 100 feet of the roost sites, to document compliance with 100-foot buffer and to monitor any aggravation of the roosts. The actual timing of migration and roost development is dependent on local seasonal patterns, and shall be tracked against the arrival of aggregations at other known sites in the region.

Standard of Success:

Success of this mitigation measure would be the avoidance of work within 100 feet of the monarch butterfly winter roosts during its winter roosting season (October to February) to minimize indirect impacts to monarch roosts. The biologist shall provide written documentation to Ventura County Planning Division that this measure was implemented and to report the results of the monitoring. Implementation of this mitigation measure would reduce impacts to a less than significant level.

MM3: Monitor Protected Trees

Mitigation Goal:

The goal is to avoid and reduce project impacts to protected trees, such as coast live oak, California sycamore, and southern California black walnut to a less than significant level.

Mitigation Action:

A qualified arborist shall be onsite to monitor construction activities that occur within the Little Sycamore Canyon Creek corridor containing California Sycamore Woodland and/or Coast Live Oak Woodland, or within 15 feet of any existing native tree with a dbh (diameter at breast height) of greater than 9.5 inches. The arborist shall aid in field fitting the least-impact path with regard to protected trees. Construction shall be avoided within the Ventura County identified Tree Protection Zone (TPZ), which is 5 feet beyond the dripline of a native tree or a minimum of 15 feet from the trunk, when feasible. When construction within the TPZ is unavoidable, as few roots as possible shall be trimmed, and shall total less than 20% of a single tree's root system. Work shall be done with hand tools or small hand held power tools that are of a depth and design that will not cause root damage. In addition, no equipment, soil, or construction materials shall be placed within the TPZ of any native tree. If impacts/encroachment to a protected tree are determined to be unavoidable (i.e., >20% of tree's roots need to be cut), applicant shall obtain the appropriate tree permit prior to any impacts to the protected tree.

Monitoring & Timing:

Prior to the commencement of ground disturbing activities a Certified Arborist will be retained by the applicant. The Certified Arborist will monitor all construction activities for the duration of the project involving trees, and will document any encroachment into the TPZ for submittal to the Ventura County Planning Division.

Standard of Success:


Success of this mitigation measure would be the avoidance or minimization of impacts to protected trees that would alter the health and safety of protected trees, and obtaining a tree permit, if necessary.

Section 5: Photos

Photos	
Location	
Map Key	
P1	
View Direction	
South	
Description	Existing road in northern portion of construction footprint immediately adjacent to Little Sycamore Canyon Creek
Location	
Map Key	
P2	
View Direction	
Southwest	
Description	Existing bridge crossing over Little Sycamore Canyon Creek

Photos

Location	
Map Key	
P3	
View Direction	
South	
Description	
<p>Riparian vegetation and existing bridge over Little Sycamore Canyon Creek</p>	

Location	
Map Key	
P4	
View Direction	
East	
Description	
<p>Existing trail (proposed pipeline path) as it leaves Little Sycamore Canyon Creek and connects with the north-south ridgeline to the west.</p>	

Photos

Location	
Map Key	
P5	
View Direction	
East	
Description	<p>Giant coreopsis scrub and southern ridgeline.</p>

Location	
Map Key	
P6	
View Direction	
Southeast	
Description	<p>Existing trail and location for proposed seepage pits on top of southern ridgeline.</p>

Summary of Biological Resource Regulations

The Ventura County Planning Division, as “lead agency” under CEQA for issuing discretionary land use permits, uses the relationship of a potential environmental effect from a proposed project to an established regulatory standard to determine the significance of the potential environmental effect. This Appendix summarizes important biological resource regulations which are used by the Division’s biologists (consultants and staff) in making CEQA findings of significance:

- Sensitive Status Species Regulations
- Nesting Bird Regulations
- Plant Community Regulations
- Waters and Wetlands Regulations
- Coastal Habitat Regulations
- Wildlife Migration Regulations
- Locally Important Species/Communities Regulations

Sensitive Status Species Regulations

Federally Protected Species

Ventura County is home to 29 federally listed endangered and threatened plant and wildlife species. The U.S. Fish and Wildlife Service (USFWS) regulates the protection of federally listed endangered and threatened plant and wildlife species.

FE (Federally Endangered): A species that is in danger of extinction throughout all or a significant portion of its range.

FT (Federally Threatened): A species that is likely to become endangered in the foreseeable future.

FC (Federal Candidate): A species for which USFWS has sufficient information on its biological status and threats to propose it as endangered or threatened under the Endangered Species Act (ESA), but for which development of a proposed listing regulation is precluded by other higher priority listing activities.

FSC (Federal Species of Concern): A species under consideration for listing, for which there is insufficient information to support listing at this time. These species may or may not be listed in the future, and many of these species were formerly recognized as “Category-2 Candidate” species.

The USFWS requires permits for the ‘taking’ of any federally listed endangered or threatened species. Take is defined by the USFWS as “to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct; may include significant habitat modification or degradation if it kills or injures wildlife by significantly impairing essential behavioral patterns including breeding, feeding, or sheltering.”

The Endangered Species Act (ESA) does not provide statutory protection for candidate species or species of concern, but USFWS encourages conservation efforts to protect these species. USFWS can set up voluntary Candidate Conservation Agreements and Assurances, which provide non-Federal landowners (public and private) with the assurance that if they implement various conservation activities to protect a given candidate species, they will not be subject to additional restrictions if the species becomes listed under the ESA.

State Protected Species

The California Department of Fish and Game (CDFG) regulates the protection of endangered, threatened, and fully protected species listed under the California Endangered Species Act. Some species may be jointly listed under the State and Federal Endangered Species Acts.

SE (California Endangered): A native species or subspecies which is in serious danger of becoming extinct throughout all, or a significant portion, of its range due to one or more causes, including loss of habitat, change in habitat, overexploitation, predation, competition, or disease.

ST (California Threatened): A native species or subspecies that, although not presently threatened with extinction, is likely to become an endangered species in the foreseeable future in the absence of the special protection and management efforts required by this chapter. Any animal determined by the commission as "rare" on or before January 1, 1985, is a "threatened species."

SFP (California Fully Protected Species): This designation originated from the State's initial effort in the 1960's to identify and provide additional protection to those animals that were rare or faced possible extinction. Lists were created for fish, mammals, amphibians, reptiles, and birds. Most fully protected species have also been listed as threatened or endangered species under the more recent endangered species laws and regulations.

SR (California Rare): A species, subspecies, or variety of plant is rare under the Native Plant Protection Act when, although not presently threatened with extinction, it is in such small numbers throughout its range that it may become endangered if its present environment worsens. Animals are no longer listed as rare; all animals listed as rare before 1985 have been listed as threatened.

SSC (California Species of Special Concern): Animals that are not listed under the California Endangered Species Act, but which nonetheless 1) are declining at a rate that could result in listing, or 2) historically occurred in low numbers and known threats to their persistence currently exist.

The CDFG requires permits for the taking of any State-listed endangered, threatened, or fully protected species. Section 2080 of the Fish and Game Code prohibits "take" of any species that the California Fish and Game Commission determines to be endangered or threatened. Take is defined in Section 86 of the Fish and Game Code as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill."

The California Native Plant Protection Act protects endangered and rare plants of California. Section 1908, which regulates plants listed under this act, states: "no person shall import into this state, or take, possess, or sell within this state, except as incident to the possession or sale of the real property on which the plant is growing, any native plant, or any part or product thereof, that the commission determines to be an endangered native plant or rare native plant, except as otherwise provided in this chapter."

The California Endangered Species Act does not provide statutory protection for California species of special concern, but they should be considered during the environmental review process.

California Native Plant Society Listed Species

Plants with CNPS listings 1A, 1B and 2 should always be addressed in CEQA documents. Plants with CNPS listings 3 and 4 do not explicitly qualify for legal protection, but can be addressed in CEQA documents depending on the circumstances and opinion of the biologist conducting the assessment.

CNPS 1A: Plants presumed to be extinct because they have not been seen or collected in the wild in California for many years. This list includes plants that are both presumed extinct in California, as well as those plants which are presumed extirpated in California. A plant is extinct in California if it no longer occurs in or outside of California. A plant that is extirpated from California has been eliminated from California, but may still occur elsewhere in its range.

CNPS 1B: Plants that are rare throughout their range with the majority of them endemic to California. Most of the plants of List 1B have declined significantly over the last century.

CNPS 2: Plants that are rare throughout their range in California, but are common beyond the boundaries of California. List 2 recognizes the importance of protecting the geographic range of widespread species.

Plants identified on CNPS Lists 1A, 1B, and 2 meet the definitions of Sec. 1901, Chapter 10 (Native Plant Protection Act) or Secs. 2062 and 2067 (California Endangered Species Act) of the California Department of Fish and Game Code, and are eligible for state listing. They should be fully considered during preparation of environmental documents relating to CEQA.

CNPS 3: A review list for plants for which there is inadequate information to assign them to one of the other lists or to reject them.

CNPS 4: A watch list for plants that are of limited distribution or infrequent throughout a broader area in California and their vulnerability or susceptibility to threat appears relatively low at this time.

Global and Subnational Rankings

Though not associated directly with legal protections, species have been given a conservation status rank by NatureServe, an international non-profit conservation organization that is the leading source for information about

rare and endangered species and threatened ecosystems. The Ventura County Planning Division considers the following ranks as sensitive for the purposes of CEQA impact assessment (G = Global, S = Subnational or State):

- G1 or S1 - Critically Imperiled
- G2 or S2 – Imperiled
- G3 or S3 - Vulnerable to extirpation or extinction

Locally Important Species

Locally important species' protections are addressed in a separate Appendix document, "Locally Important Species/Communities Regulations."

For lists of some of the species in Ventura County that are protected by the above regulations, go to www.ventura.org/rma/planning/bio_resources/index.htm.

Nesting Bird Regulations

The Federal Migratory Bird Treaty Act (MBTA) and the California Department of Fish and Game (CDFG) Code (3503, 3503.5, 3511, 3513 and 3800) protect most native birds. In addition, the federal and state endangered species acts protect some bird species listed as threatened or endangered. Project-related impacts to birds protected by these regulations would occur during the breeding season, because unlike adult birds, eggs and chicks are unable to escape impacts.

The MBTA implements various treaties and conventions between the U.S. and Canada, Japan, Mexico, and Russia for the protection of migratory birds, which occur in two of these countries over the course of one year. The Act maintains that it is unlawful to pursue, hunt, take, capture or kill; attempt to take, capture or kill; possess, offer to or sell, barter, purchase, deliver or cause to be shipped, exported, imported, transported, carried or received any migratory bird, part, nest, egg or product, manufactured or not. Bird species protected under the provisions of the MBTA are identified by the List of Migratory Birds (Title 50 of the Code of Federal Regulations, Section 10.13 as updated by the 1983 American Ornithologists' Union (AOU) Checklist and published supplements through 1995 by the USFWS).

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

NOTE: These regulations protect almost all *native nesting birds*, not just sensitive status birds.

Plant Community Regulations

Plant communities are provided legal protection when they provide habitat for protected species, when the community is in the coastal zone and qualifies as environmentally sensitive habitat area (ESHA), or when the community qualifies as locally important.

Global and Subnational Rankings

Though not associated directly with legal protections, plant communities have been given a conservation status rank by NatureServe, an international non-profit conservation organization that is the leading source for information about rare and endangered species and threatened ecosystems. The Ventura County Planning Division considers the following ranks as sensitive for the purposes of CEQA impact assessment (G = Global, S = Subnational or State):

- G1 or S1 - Critically Imperiled
- G2 or S2 - Imperiled
- G3 or S3 - Vulnerable to extirpation or extinction

CDFG Rare

Rare natural communities are those communities that are of highly limited distribution. These communities may or may not contain rare, threatened, or endangered species. Though the Native Plant Protection Act and the California Endangered Species Act provide no legal protection to plant communities, CDFG considers plant communities that

are ranked G1-G3 or S1-S3 (as defined above) to be rare or sensitive, and therefore these plant communities should be addressed during CEQA review.

Environmentally Sensitive Habitat Areas

The Coastal Act specifically calls for protection of “environmentally sensitive habitat areas” or ESHA, which it defines 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” (Section 30107.5).

ESHA has been specifically defined in the Santa Monica Mountains. For projects in this location, the Coastal Commission, the agency charged with administering the Coastal Act, has developed a specific three-part test for determining whether habitat there should be considered coastal sage scrub/chaparral ESHA. A memo from a Coastal Commission biologist outlining this test can be found at:

www.ventura.org/rma/planning/pdf/bio_resources/ESHA_Santa_Monica_Mountains.pdf.

Locally Important Communities

The Ventura County Initial Study Assessment Guidelines defines a locally important community as one that is considered by qualified biologists to be a quality example characteristic of or unique to the County or region, with this determination being made on a case-by-case basis. The County has not developed a list of locally important communities, but has deemed oak woodlands to be a locally important community.

Waters and Wetlands Regulations

Numerous agencies control what can and cannot be done in or around streams and wetlands. If a project affects an area where water flows, ponds or is present even part of the year, it is likely to be regulated by one or more agencies. Many wetland or stream projects will require three main permits or approvals (in addition to CEQA compliance). These are:

- 404 Permit (U.S. Army Corps of Engineers)
- 401 Certification (Regional Water Quality Control Board)
- Streambed Alteration Agreement (California Department of Fish and Game)

In addition, the Ventura County General Plan calls for protection of wetlands and there are several other federal, state and local permits that could be required when a project involves disturbance to wetlands or waters. For a more thorough explanation of wetland permitting, see the Ventura County’s “Wetland Project Permitting Guide” at www.ventura.org/rma/planning/pdf/prog_servs/bio_resources/FinalPDF.pdf.

404 Permit (U.S. Army Corps of Engineers)

Most projects that involve streams or wetlands will require a 404 Permit from the U.S. Army Corps of Engineers (USACE). Section 404 of the federal Clean Water Act is the primary federal program regulating activities in wetlands. The Act regulates areas defined as “waters of the United States.” This includes streams, wetlands in or next to streams, areas influenced by tides, navigable waters, lakes, reservoirs and other impoundments. For nontidal waters, USACE jurisdiction extends up to what is referred to as the “ordinary high water mark” as well as to the landward limits of adjacent Corps-defined wetlands, if present. The ordinary high water mark is an identifiable natural line visible on the bank of a stream or water body that shows the upper limit of typical stream flow or water level. The mark is made from the action of water on the streambank over the course of years.

Permit Triggers: A USACE 404 Permit is triggered by moving (discharging) or placing materials—such as dirt, rock, geotextiles, concrete or culverts—into or within USACE jurisdictional areas. This type of activity is also referred to as a “discharge of dredged or fill material.”

401 Certification (Regional Water Quality Control Board)

If your project requires a USACE 404 Permit, then you will also need a Regional Water Quality Control Board (RWQCB) 401 Certification. The federal Clean Water Act, in Section 401, specifies that states must certify that any activity subject to a permit issued by a federal agency, such as the USACE, meets all state water quality standards.

In California, the state and regional water boards are responsible for certification of activities subject to USACE Section 404 Permits.

Permit Trigger: A RWQCB 401 Certification is triggered whenever a USACE 404 Permit is required, or whenever an activity could cause a discharge of dredged or fill material into waters of the U.S. or wetlands.

Streambed Alteration Agreement (California Department of Fish and Game)

If your project includes alteration of the bed, banks or channel of a stream, or the adjacent riparian vegetation, then you may need a Streambed Alteration Agreement from the California Department of Fish and Game (CDFG). The California Fish and Game Code, Sections 1600-1616, regulates activities that would alter the flow, bed, banks, channel or associated riparian areas of a river, stream or lake—all considered “waters of the state.” The law requires any person, state or local governmental agency or public utility to notify CDFG before beginning an activity that will substantially modify a river, stream or lake.

Permit Triggers: A Streambed Alteration Agreement (SAA) is triggered when a project involves altering a stream or disturbing riparian vegetation, including any of the following activities:

- Substantially obstructing or diverting the natural flow of a river, stream or lake
- Using any material from these areas
- Disposing of waste where it can move into these areas

Some projects that involve routine maintenance may qualify for long-term maintenance agreements from CDFG. Discuss this option with CDFG staff.

Ventura County General Plan

The Ventura County General Plan contains policies which also strongly protect wetland habitats.

Biological Resources Policy 1.5.2-3 states:

Discretionary development that is proposed to be located within 300 feet of a marsh, small wash, intermittent lake, intermittent stream, spring, or perennial stream (as identified on the latest USGS 7½ minute quad map), shall be evaluated by a County approved biologist for potential impacts on wetland habitats. Discretionary development that would have a significant impact on significant wetland habitats shall be prohibited, unless mitigation measures are adopted that would reduce the impact to a less than significant level; or for lands designated "Urban" or "Existing Community", a statement of overriding considerations is adopted by the decision-making body.

Biological Resources Policy 1.5.2-4 states:

Discretionary development shall be sited a minimum of 100 feet from significant wetland habitats to mitigate the potential impacts on said habitats. Buffer areas may be increased or decreased upon evaluation and recommendation by a qualified biologist and approval by the decision-making body. Factors to be used in determining adjustment of the 100 foot buffer include soil type, slope stability, drainage patterns, presence or absence of endangered, threatened or rare plants or animals, and compatibility of the proposed development with the wildlife use of the wetland habitat area. The requirement of a buffer (setback) shall not preclude the use of replacement as a mitigation when there is no other feasible alternative to allowing a permitted use, and if the replacement results in no net loss of wetland habitat. Such replacement shall be "in kind" (i.e. same type and acreage), and provide wetland habitat of comparable biological value. On-site replacement shall be preferred wherever possible. The replacement plan shall be developed in consultation with California Department of Fish and Game.

Coastal Habitat Regulations

Ventura County's Coastal Area Plan and the Coastal Zoning Ordinance, which constitute the "Local Coastal Program" (LCP) for the unincorporated portions of Ventura County's coastal zone, ensure that the County's land use plans, zoning ordinances, zoning maps, and implemented actions meet the requirements of, and implement the provisions and policies of California's 1976 Coastal Act at the local level.

Environmentally Sensitive Habitats

The Coastal Act specifically calls for protection of “environmentally sensitive habitat areas” or ESHA, which it defines 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” (Section 30107.5).

Section 30240 of the Coastal Act states:

- (a) "Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on such resources shall be allowed within such areas."
- (b) "Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade such areas, and shall be compatible with the continuance of such habitat areas."

There are three important elements to the definition of ESHA. First, a geographic area can be designated ESHA either because of the presence of individual species of plants or animals or because of the presence of a particular habitat. Second, in order for an area to be designated as ESHA, the species or habitat must be either rare or it must be especially valuable. Finally, the area must be easily disturbed or degraded by human activities.

Protection of ESHA is of particular concern in the southeastern part of Ventura County, where the coastal zone extends inland (~5 miles) to include an extensive area of the Santa Monica Mountains. The Coastal Commission, the agency charged with administering the Coastal Act, developed a specific three-part test for determining whether habitat in the Malibu area of the Santa Monica Mountains should be considered coastal sage scrub/chaparral ESHA. Given that Malibu is immediately adjacent to the Ventura County part of the Santa Monica Mountains, this three-part test can be used for assessing whether coastal sage scrub and chaparral habitat in the Ventura County coastal zone meets the definition of ESHA. A memo from a Coastal Commission biologist outlines this test and can be found at: www.ventura.org/rma/planning/pdf/bio_resources/ESHA_Santa_Monica_Mountains.pdf.

The County’s Local Coastal Program outlines other specific protections to environmentally sensitive habitats in the Coastal Zone, such as to wetlands, riparian habitats and dunes. Protections in some cases are different for different segments of the coastal zone.

Copies of the Coastal Area Plan and the Coastal Zoning Ordinance can be found at: www.ventura.org/rma/planning/programs_services/local_coast/local_coast.htm.

Wildlife Migration Regulations

The Ventura County General Plan specifically includes wildlife migration corridors as an element of the region’s significant biological resources. In addition, protecting habitat connectivity is critical to the success of special status species and other biological resource protections. Potential project impacts to wildlife migration are analyzed by biologists on a case-by-case basis. The issue involves both a macro-scale analysis—where routes used by large carnivores connecting very large core habitat areas may be impacted—as well as a micro-scale analysis—where a road or stream crossing may impact localized movement by many different animals.

Locally Important Species/Communities Regulations

Locally important species/communities are considered to be significant biological resources in the Ventura County General Plan, thus one of the County’s threshold criteria for the evaluation of impacts to biological resources is whether the project impacts locally important species/communities.

Locally Important Species

The following criteria were developed with the assistance of local biologists:

Locally Important Animal Species Criteria

1. Taxa for whom habitat in Ventura County is crucial for their existence either globally or in Ventura County. This includes taxa for whom:
 - Populations in Ventura County represents 10% or more of the known extant global distribution; or

- In Ventura County, there are less than 6 element occurrences, or less than 1,000 individuals, or less than 2,000 acres.
2. Native taxa that are generally declining throughout their range and/or are in danger of extirpation in Ventura County.

Locally Important Plant Species Criteria

A locally important plant is a taxon that is declining throughout the extent of its range AND has a maximum of five (5) element occurrences in Ventura County.

Locally Important Animal and Plant Species Criteria

In some cases, to be determined on an individual basis, there are taxa whose population(s) do not qualify as locally important species; however, certain locations where a taxon occurs will be defined as locally important. This includes:

- If known, the published type locality for a holotype specimen.
- The edge of a taxon's range. This criteria does not apply to non-native taxa or those taxa whose range and population(s) size is expanding.

The County maintains a list of locally important species, which can be found on the Planning Division website at: www.ventura.org/rma/planning/programs_services/bio_resources/bio_resources.htm. *This list should not be considered comprehensive.* Any species that meets the criteria qualifies as locally important, whether or not it is included on this list.

Locally Important Communities

The Ventura County Initial Study Assessment Guidelines defines a locally important community as one that is considered by qualified biologists to be a quality example characteristic of or unique to the County or region, with this determination being made on a case-by-case basis. The County has not developed a list of locally important communities. Oak woodlands have however been deemed by the Ventura County Board of Supervisors to be a locally important community.

The state passed legislation in 2001, the Oak Woodland Conservation Act, to emphasize that oak woodlands are a vital and threatened statewide resource. In response, the County of Ventura prepared and adopted an Oak Woodland Management Plan that recommended, among other things, amending the County's Initial Study Assessment Guidelines to include an explicit reference to oak woodlands as part of its definition of locally important communities. The Board of Supervisors approved this management plan and its recommendations.

Appendix Two
Observed Species Tables

Plant Species Observed				
Scientific Name	Common Name	Native	Habit	Family
<i>Ambrosia psilostachya</i> var. <i>californica</i>	Western ragweed	Yes	BH	Asteraceae
<i>Anagallis arvensis</i>	Scarlet pimpernel	No	AH	Primulaceae
<i>Artemisia californica</i>	California sagebrush	Yes	S	Asteraceae
<i>Asclepias fascicularis</i>	Narrowleaf milkweed	Yes	PH	Apocynaceae
<i>Astragalus trichopodus</i> var. <i>phoxus</i>	Antisell three-pod milkvetch	Yes	PH	Fabaceae
<i>Atriplex lentiformis</i> ssp. <i>breweri</i>	Brewer big saltbush	Yes	S	Chenopodiaceae
<i>Avena barbata</i>	Slender wild oat	No	AG	Poaceae
<i>Baccharis pilularis</i>	Coyote brush	Yes	S	Asteraceae
<i>Baccharis salicifolia</i>	Mulefat	Yes	S	Asteraceae
<i>Brachypodium distachyon</i>	Short-pediceled brome	No	AH	Poaceae
<i>Brickellia californica</i>	California brickellbush	Yes	S	Asteraceae
<i>Bromus diandrus</i>	Ripgut grass	No	AG	Poaceae
<i>Bromus madritensis</i> ssp. <i>rubens</i>	Red brome	No	AG	Poaceae
<i>Calystegia macrostegia</i> ssp. <i>intermedia</i>	Intermediate morning-glory	Yes	PV	Convolvulaceae
<i>Carduus pycnocephalus</i>	Italian thistle	No	AH	Asteraceae
<i>Carpobrotus edulis</i>	Hottentot fig	No	PH/S	Aizoaceae
<i>Ceanothus spinosus</i>	Greenbark ceanothus	Yes	S	Rhamnaceae
<i>Centaurea melitensis</i>	Tocalote	No	AH	Asteraceae
<i>Cercocarpus betuloides</i> var. <i>betuloides</i>	Birchleaf mountain mahogany	Yes	S	Rosaceae
<i>Chamaesyce albomarginata</i>	Rattlesnake spurge	Yes	AH	Euphorbiaceae
<i>Chenopodium californicum</i>	California goosefoo	Yes	PH	Chenopodiaceae
<i>Coreopsis gigantea</i>	Giant Coreopsis	Yes	S	Asteraceae
<i>Dichelostemma capitatum</i> ssp. <i>capitatum</i>	Blue dicks	Yes	PG	Themidaceae
<i>Dudleya lanceolata</i>	Lanceleaf live-forever	Yes	PH	Crassulaceae
<i>Encelia californica</i>	California bush sunflower	Yes	S	Asteraceae
<i>Eriogonum cinereum</i>	Ash coast buckwheat	Yes	S	Polygonaceae
<i>Eriophyllum confertiflorum</i> var. <i>confertiflorum</i>	Golden yarrow	Yes	PH	Asteraceae
<i>Erodium botry</i>	Broadleaf filaree	No	AH	Geraniaceae
<i>Erodium cicutarium</i>	Redstem filaree	No	AH	Geraniaceae
<i>Eucalyptus globulus</i>	Tasmanian blue gum	No	T	Myrtaceae
<i>Euphorbia peplus</i>	Petty spurge	No	AH	Euphorbiaceae
<i>Foeniculum vulgare</i>	Sweet fennel	No	PH	Apiaceae
<i>Galium angustifolium</i> ssp. <i>angustifolium</i>	Chaparral bedstraw	Yes	S	Rubiaceae
<i>Grindelia camporum</i> var. <i>bracteosum</i>	Bracted gumplant	Yes	S	Asteraceae
<i>Hazardia squarrosa</i> var. <i>grindelioides</i>	Sawtooth goldenbush	Yes	S	Asteraceae
<i>Hesperoyucca whipplei</i> ssp. <i>whipplei</i>	Our Lord's candle	Yes	S	Agavaceae
<i>Heteromeles arbutifolia</i>	Toyon	Yes	S	Rosaceae
<i>Hirschfeldia incana</i>	Summer mustard	No	PH	Brassicaceae
<i>Hordeum marinum</i> ssp. <i>gussoneanum</i>	Mediterranean barley	No	AG	Poaceae
<i>Isomeris arborea</i>	Bladderpod	Yes	S	Brassicaceae
<i>Juglans californica</i> var. <i>californica</i>	Southern Calif. black walnut	Yes	T	Juglandaceae
<i>Keckiella cordifolia</i>	Heart-leaved bush penstemon	Yes	S	Veronicaceae
<i>Lathyrus vestitus</i> var. <i>laevicarpus</i>	Pacific peavine	Yes	PV	Fabaceae
<i>Lessingia filaginifolia</i> var. <i>filaginifolia</i>	California cudweed-aster	Yes	PH	Asteraceae
<i>Leymus condensatus</i>	Giant wildrye	Yes	PG	Poaceae
<i>Lotus scoparius</i> var. <i>scoparius</i>	Deerweed	Yes	PH	Fabaceae
<i>Malacothamnus fasciculatus</i>	Chaparral bushmallow	Yes	S	Malvaceae
<i>Malacothrix saxatilis</i> var. <i>tenuifolia</i>	Tenuated cliff-aster	Yes	PH	Asteraceae
<i>Malosma laurina</i>	Laurel sumac	Yes	S	Anacardiaceae

Plant Species Observed				
Scientific Name	Common Name	Native	Habit	Family
<i>Malva parviflora</i>	Cheeseweed	No	AH	Malvaceae
<i>Marah macrocarpus</i> var. <i>macrocarpus</i>	Large-fruited man-root	Yes	PV	Cucurbitaceae
<i>Marrubium vulgare</i>	White horehound	No	S	Lamiaceae
<i>Medicago polymorpha</i>	Common burclover	No	AH	Fabaceae
<i>Melilotus indica</i>	Sourclover	No	AH	Fabaceae
<i>Mimulus aurantiacus</i> var. <i>aurantiacus</i>	Bush monkeyflower	Yes	S	Phrymaceae
<i>Mirabilis laevis</i> var. <i>crassifolia</i>	California wishbone bush	Yes	PH	Nyctaginaceae
<i>Myoporum laetum</i>	Myoporum	No	S	Myoporaceae
<i>Nerium oleander</i>	Oleander	No	S	Apocynaceae
<i>Nicotiana glauca</i>	Tree tobacco	No	FAC	Solanaceae
<i>Olea europaea</i>	European olive	No	T	Oleaceae
<i>Opuntia littoralis</i>	Coastal prickly pear	Yes	S	Cactaceae
<i>Oxalis pes-caprae</i>	Bermuda buttercup	No	PH	Oxalidaceae
<i>Paeonia californica</i>	California peony	Yes	PH	Paeaniaceae
<i>Pellaea andromedifolia</i> var. <i>andromedifolia</i>	Coffee fern	Yes	PF	Pteridaceae
<i>Pentagramma triangularis</i> ssp. <i>triangularis</i>	Goldenback fern	Yes	PF	Pteridaceae
<i>Pinus</i> sp.	Pine	No	T	Pinaceae
<i>Piptatherum miliaceum</i>	Smilo grass	No	PG	Poaceae
<i>Plantago lanceolata</i>	English plantain	No	PH	Plantaginaceae
<i>Platanus racemosa</i> var. <i>racemosa</i>	California sycamore	Yes	T	Platanaceae
<i>Poa secunda</i> ssp. <i>secunda</i>	One-sided bluegrass	Yes	PG	Poaceae
<i>Pseudognaphalium californicum</i>	Green everlasting	Yes	A/BH	Asteraceae
<i>Pseudognaphalium californicum</i>	Green everlasting	Yes	A/BH	Asteraceae
<i>Quercus agrifolia</i> var. <i>agrifolia</i>	Coast live oak	Yes	T	Fagaceae
<i>Rhus integrifolia</i>	Lemonade berry	Yes	S	Anacardiaceae
<i>Rhus ovata</i>	Sugar bush	Yes	S	Anacardiaceae
<i>Rubus ursinus</i>	Pacific blackberry	Yes	PV	Rosaceae
<i>Salix lasiolepis</i> var. <i>lasiolepis</i>	Arroyo willow	Yes	T	Salicaceae
<i>Salvia leucophylla</i>	Purple sage	Yes	S	Lamiaceae
<i>Salvia mellifera</i>	Black sage	Yes	S	Lamiaceae
<i>Sambucus mexicana</i>	Blue elderberry	Yes	S	Caprifoliaceae
<i>Schinus molle</i>	Peruvian pepper tree	No	T	Anacardiaceae
<i>Schinus terebenthifolius</i>	Brazilian pepper tree	No	T	Anacardiaceae
<i>Schismus arabicus</i>	Arabian grass	No	AG	Poaceae
<i>Scrophularia californica</i> ssp. <i>californica</i>	California figwort	Yes	PH	Scrophulariaceae
<i>Solanum douglasii</i>	Douglas nightshade	Yes	PH	Solanaceae
<i>Solanum xantii</i> var. <i>xantii</i>	Chaparral nightshade	Yes	S	Solanaceae
<i>Sonchus asper</i>	Prickly sow-thistle	No	AH	Asteraceae
<i>Sonchus asper</i> ssp. <i>asper</i>	Prickly sow-thistle	No	AH	Asteraceae
<i>Sonchus oleraceus</i>	Common sow-thistle	No	AH	Asteraceae
<i>Stachys bullata</i>	Pink hedge nettle	Yes	PH	Lamiaceae
<i>Toxicodendron diversilobum</i>	Western poison oak	Yes	S/V	Anacardiaceae
<i>Trichostema lanatum</i>	Woolly bluecurls	Yes	S	Lamiaceae
<i>Tropaeolum majus</i>	Garden nasturtium	No	PH	Tropaeolaceae
<i>Venegasia carpesioides</i>	Canyon sunflower	Yes	PH/S	Asteraceae
<i>Vinca major</i>	Greater periwinkle	No	PV	Apocynaceae

Wildlife Species Observed			
Scientific Name	Common Name	Native?	Notes
Reptiles			
<i>Uta stansburiana</i>	Side-blotched lizard	Yes	
<i>Sceloporus occidentalis</i>	Western fence lizard	Yes	
Birds			
<i>Empidonax difficilis</i>	Pacific-slope flycatcher	Yes	
<i>Sialia mexicana</i>	Western bluebird	Yes	Male in flight
<i>Calypte anna</i>	Anna's hummingbird	Yes	Multiple individuals/pairs
<i>Dendroica coronata</i>	Yellow-rumped warbler	Yes	Multiple individuals/pairs
<i>Corvus corax</i>	Common raven	Yes	In flight
<i>Sayornis nigricans</i>	Black phoebe	Yes	
<i>Pelecanus occidentalis</i>	Brown pelican	Yes	In flight ~ 50 feet from survey area
<i>Psaltiriparus minimus</i>	Bushtit	Yes	
<i>Buteo jamaicensis</i>	Red-tailed hawk	Yes	
<i>Aphelocoma californica</i>	Western scrub-jay	Yes	Multiple individuals/pairs
<i>Corvus brachyrhynchos</i>	American crow	Yes	Flying overhead
<i>Chamaea fasciata</i>	Wrentit	Yes	Singing
Mammals			
<i>Canis latrans</i>	Coyote	Yes	Scat
<i>Spermophilus beecheyi</i>	California ground squirrel	Yes	

Exhibit 10
Response to Coastal Commission Comment Letters
Camp Hess Kramer Emergency Permit (PL19-0005)

May 6, 2021 Coastal Commission Letter

Comment #1: Coastal Act Section 30236, as incorporated in the LCP, allows for alterations to streambeds when required for flood control projects where no other less damaging alternative is feasible and when necessary to protect public safety or existing development. However, the subject staff report does not contain any findings relating to Section 30236. As such, it is not clear if the proposed stabilization work is the least damaging alternative. Furthermore, as a majority of the existing development on the project site was destroyed, it is unclear how the proposed stream alteration is necessary to protect public safety or existing development. The proposed project includes the placement of rock and other hardened structures within Little Sycamore Canyon Creek. However, the size and quantity of rock that is proposed to be placed, as well as the total area of creek that it would cover is unclear. Although restoration is proposed as part of the subject project, it is unclear if the amount proposed is adequate to mitigate all adverse impacts resulting from the proposed project.

County Response to Comment #1: The project was revised on January 12, 2022, to eliminate the additional bank stabilization, two grade control structures, cut-off trenches, and a storm drain outlet. Additional work required to further stabilize or impact the creek will be evaluated as part of the camp rebuild project (Case No. PL21-0051).

This Coastal PD permit application only includes a request by the applicant to authorize the previous emergency work granted by 2019 Emergency Permit. Under the Emergency Permit, the applicant removed approximately 14,000 cubic yards of mud and debris from Little Sycamore Creek and installed five check dams made of rock and rip rap from the creek at different points within the creek to stabilize the bank and to protect property and ensure public safety. The applicant intends to use fill dirt currently stored at temporary stockpile areas for additional creek restoration under the camp rebuild project (Case No. PL21-0051). Three temporary water diversions were constructed out of sandbags (approximately 3 to 4 feet high) filled with clean sand and wrapped with visqueen plastic to prevent sedimentation into the creek. The completed emergency work was evaluated for consistency with California Coastal Act Section 30236 was evaluated in the General Plan Consistency Analysis (Exhibit 7) and Section D.1 of the June 30, 2022 Planning Director staff report.

As the additional bank stabilization measures are no longer proposed as part of the project, the completed emergency work was the minimum amount necessary to alleviate the immediate threat.

County of Ventura
Planning Director Hearing
PL19-0005
Exhibit 10 - May 6, 2021, and December 1, 2021,
Coastal Commission Letter and County Response

Comment #2: The subject staff report indicates that due to the Woolsey Fire, ESHA on the subject property was “completely lost”; however, Commission staff would note that although the habitats on-site may exhibit post-fire conditions, they continue to constitute ESHA, and the LCP requires the protection of ESHA and the provision of ESHA buffers. It is unclear if all proposed staging and stockpiling areas, which total approximately .45-acres, would be located outside of ESHA and ESHA buffer areas.

County Response to Comment #2: The camp is situated adjacent to Little Sycamore Creek. Staging and stockpiling areas are located within ESHA buffer areas. The stockpile and staging locations were selected because they were previously disturbed areas, did not have vegetation, were flat/level, and outside of the creek and creek bank. The applicant intends to use this fill dirt additional creek restoration under the camp rebuild project (Case No. PL21-0051). Relocating the mud/soil to Gindling Hilltop Camp or another offsite location would result in approximately 1,400 truck trips. When the camp is rebuilt, the same number of truck trips would have to be replicated. Therefore, stockpiled mud/soil remained onsite. BMPs (i.e., silt barriers, fiber rolls, sand/gravel bags, straw bale barriers, etc.) were installed to confine the stockpiles and prevent transport of sediment. Fueling, lubrication, maintenance, storage and staging of vehicles and equipment did not result in a discharge into the creek (Exhibit 4, Section 4.1, pg. 14 of the June 30, 2022, Planning Director staff report).

Comment #3: The Southern California Steelhead Trout, are found in streams in the Santa Monica. However, the staff report does not indicate if Little Sycamore Canyon Creek has been, or could potentially be utilized by steelhead, and does not include an analysis of how the subject development could potentially impact this sensitive species.

County Response to Comment #3: The July 2011 ISBA prepared for Conditional Use Permit, Case No. LU10-0069 (Exhibit 9 of the June 30, 2022 Planning Director staff report), states that critical habitat for the steelhead trout is within 5 miles of the project site and has a low potential to occur onsite. Following the Woolsey Fire, significant rainstorms in November 2018 and January 2019, sent debris and mud originating from the burn areas into Little Sycamore Creek filling the creek with mud and debris and onto the camp property. There was no habitat for steelhead at this time. Rincon Consultant biologists visited the site 18 times while emergency work was being conducted to ensure compliance with the permit’s biological mitigation measures. Steelhead trout was not observed in the creek. As no new development is proposed in the creek and the completed emergency work was the minimum amount necessary to alleviate the immediate threat, there is no threat to steelhead trout if they were to migrate into the lower reaches of the creek that are located within Camp Hess Kramer. Additional creek restoration proposed by the applicant will be evaluated as part of the camp rebuild project (Case No. PL21-0051).

Comment #4: Condition No. 38 of the subject PD Permit requires a Watercourse Permit from the Ventura County Watershed Protection District to address potential impacts to

Little Sycamore Canyon Creek that would result from the installation of the grade control structures, cut-off trenches, and a storm drain outlet feature that would alter the characteristics of the flow of water within the creek, However, adverse impacts from the proposed project should be assessed prior to approval of the subject PD Permit in order to ensure that the project is consistent with the policies and provisions of the LCP.

County Response to Comment #4: Ventura County Watershed Protection District Watercourse Permit 2019-010 was never issued to permit the emergency work because design plans that fully evaluated the impact of the emergency work were not submitted to the Watershed Protection District. The Watercourse Permit will be amended to include engineered construction plans and hydraulic modeling that depict existing and proposed drainage trends, proposed improvements, storage volume and peak flood discharge will be required for review and approval of the permit. (Exhibit 8, Condition No. 30 of the June 30, 2022 Planning Director staff report).

Comment #5: The Coastal Act and LCP require that ESHA and other coastal resources be protected and enhanced to the maximum extent feasible. In order to determine consistency with the policies and provisions of the LCP, additional information and analyses are necessary.

County Response to Comment #5: Refer to Response to Comment # 1, above.

December 1, 2021 Coastal Commission Letter and County Response to Comments

Comment #1: Coastal Act Section 30236, as incorporated in the LCP, allows for alterations to streambeds when required for flood control projects where no other less damaging alternative is feasible and when necessary to protect public safety or existing development. Staff has reviewed the updated findings in the subject staff report related to Section 30236 and the letter from the applicant dated July 23, 2021 and would like to point out the following remaining issues. The staff report findings and applicant's letter both state that the proposed stabilization work is needed to protect the existing access road and bridges. However, based on the project plans, it is unclear how some of the proposed rock sections protect existing roads and bridges or if the proposed scale of the rock placement is the minimum necessary. For example, the 70-foot section of rock located adjacent to the bridge in bank stabilization area #2 extends well beyond the adjacent bridge abutment; the 50-foot section of rock in bank stabilization area #3 appears to be on the mountain side of the creek, across from the Camp Access Road, thus it is unclear how the rock would serve to protect the existing access road. Furthermore, the applicant's letter stated that the bank stabilization will serve to protect wet and dry utilities under the existing access road. However, based on the project plans and other exhibits included within the staff report, the type of utilities and their location relative to the access road and the bank stabilization structures is unclear. Due to the reasons stated above, in addition to the lack of information within the findings of the staff report, it remains unclear if the proposed stabilization work is the least damaging

alternative, or if the proposed work is allowable under Section 30236 of the Coastal Act. While the applicant's letter includes an alternatives analysis, the staff report should also include findings describing project alternatives in order to determine the least damaging alternative consistent with Section 30236.

Response to Comment to Comment #1: Refer to Response to Comment # 1 in reference to the California Coastal Commission's letter dated May 6, 2021 (above). The additional bank stabilization work initially proposed as part of the Coastal PD permit (i.e. rock rip-rap followed by revegetation of the creek banks, installation of two grade control structures, cut-off trenches, and a storm drain outlet) is no longer necessary, so the applicant eliminated it from this Coastal PD permit.

Comment #2: Since the proposed project includes permanent authorization of work completed under the Emergency PD Permit approved by the Planning Division on January 31, 2019, those components from the Emergency PD permit also need to be analyzed for consistency with Section 30236, as well as the other resource protection policies of the LCP. Moreover, all project findings and exhibits should include the work completed under the Emergency PD permit.

County Response to Comment #2: The completed emergency work was evaluated for consistency with California Coastal Act Section 30236 as part of the General Plan Consistency Analysis (Exhibit 7) and Section D.1 of the June 30, 2022 Planning Director staff report. Permit Findings were evaluated in Section E of the June 30, 2022 Planning Director staff report.

Comment #3: The proposed project includes the placement of rock and other hardened structures within Little Sycamore Canyon Creek. The staff report states that the installation of proposed bank stabilization measures will permanently remove approximately 0.09 acres of riparian habitat along the creek, and permanent impacts to ESHA will be mitigated at a 2:1 mitigation to impact ratio for a total of 8,340 square feet (0.19 acres) of ESHA to be restored and preserved onsite. However, Commission staff notes that the appropriate mitigation to impact ratio for riparian habitat is 3:1, instead of a 2:1 ratio. Furthermore, the staff report characterizes the proposed staging and stockpiling areas as unvegetated, previously disturbed areas; however, it remains unclear if all four proposed staging and stockpiling areas constitute ESHA or ESHA buffer areas. Commission staff would note that habitats on-site that are damaged by the Woolsey Fire continue to constitute ESHA, and the LCP requires the protection of ESHA and the provision of ESHA buffers.

County Response to Comment #3: Refer to Response to Comment # 1 in reference to the California Coastal Commission's letter dated May 6, 2021 (above). Impacts to ESHA that are attributed to the Woolsey Fire are considered a natural disaster and not from the operation of Camp Hess Kramer. Therefore, areas disturbed to remove debris and mud from the creek will be restored on their own accord. However, additional creek restoration

work that is proposed as part of the camp rebuild will be evaluated as part that project (Case No. PL21-0051), including restoration of creek banks and adjoining upland areas.

Comment #4: The staff report findings and the applicant's letter state that Little Sycamore Creek does not provide suitable spawning or rearing habitat for steelhead trout since there was no water present in the survey area during the 2020 and 2021 surveys. However, it is unclear whether the surveys were done during the wet season when Little Sycamore Creek is more likely to have water. Additionally, given that rainfall has been low over the past several years, historic data should also be analyzed, and the staff report should contain findings relating to how the proposed project could impact the ability of fish species to utilize the subject stream.

County Response to Comment #4: Refer to Response to Comment # 3 in reference to the California Coastal Commission's letter dated May 6, 2021 (above).

Comment #5: Condition No. 38 of the subject PD Permit requires a Watercourse Permit from the Ventura County Watershed Protection District to address potential impacts to Little Sycamore Canyon Creek that would result from the installation of the grade control structures, cut-off trenches, and a storm drain outlet feature that would alter the characteristics of the flow of water within the creek. Although the applicant explained that there will not be adverse impacts from the proposed scope of work, the consideration of impacts to the stream and riparian habitat cannot be delegated to a subsequent permit process. Any significant adverse impacts from the proposed project should be assessed prior to approval of the subject PD Permit in order to ensure that the project is consistent with the policies and provisions of the LCP.

County Response to Comment #5: Refer to County Response to Comment # 4 in reference to the California Coastal Commission's letter dated May 6, 2021(above).

Comment #6: The Coastal Act and LCP require that ESHA be protected from significant disruption of habitat values and that other coastal resources be protected and enhanced to the maximum extent feasible. In order to determine consistency with the policies and provisions of the LCP, additional information and analyses are necessary.

County Response to Comment # 6: Refer to Response to Comments # 1 and # 2, above. In accordance with Coastal Area Plan South Coast Santa Monica Mountains Policy 3, Conditional Use Permit LU10-0069 included Condition of Approval No. 25 requiring the applicant to record a deed restriction identifying ESHA. A Notice of Land Use Entitlement and an exhibit identifying ESHA was recorded (Instrument No. 20171004-0012927201). The emergency work was confined to the creek and did not expand into the restricted ESHA areas.

Comment #7: Lastly, it appears that the subject PD permit would be appealable to the Commission, and as such, should be noticed accordingly.

County Response to Comment # 7: The June 30, 2022, Planning Division staff report indicates that the Coastal PD is appealable to the Coastal Commission. Notification of the June 30, 2022 Planning Director hearing and a link to the Planning Director staff report for the Coastal PD was sent to the Coastal Commission on June 20, 2022.