

4.4 BIOLOGICAL RESOURCES

This section evaluates the potential effects of implementing the 2040 General Plan on biological resources, including special-status species, sensitive natural communities, wetlands, wildlife movement corridors, wildlife nursery sites, and biological resources protected by a local policy or ordinance. As described in the “Approach to the Environmental Analysis” section, above, the following assessment of impacts is based primarily on the characterization of existing environmental conditions and regulatory setting provided in the January 2020 Background Report (Appendix B). Where necessary, each section identifies changes (e.g., new information, regulatory changes) to the environmental and regulatory setting included in the Background Report that are relevant to understanding the 2040 General Plan’s potential impacts.

Comments on the notice of preparation (NOP) included concerns regarding endangered and threatened wildlife species, sensitive natural habitats including riparian and aquatic habitats, and wildlife movement corridors. These comments are addressed in this section, as appropriate. The NOP and comments on the NOP are included in Appendix A.

4.4.1 Background Report Setting Updates

REGULATORY SETTING

In addition to the information provided in Section 8.2, “Biological Resources,” of the Background Report (Appendix B), the following information is relevant to understanding and evaluating the potential biological resources impacts of the 2040 General Plan.

Ventura County Habitat Connectivity and Wildlife Corridor Ordinance

The County’s Habitat Connectivity and Wildlife Corridor ordinances, adopted in March of 2019, provide protections for areas designated as important wildlife corridors within the non-coastal unincorporated area in order to help preserve functional connectivity for wildlife and vegetation and to minimize loss of vegetation and habitat fragmentation. Two new overlay zones were established by the ordinances: the Habitat Connectivity and Wildlife Corridors (HCWC) Overlay Zone, and the Critical Wildlife Passage Areas (CWPA) Overlay Zone. Within the HCWC Overlay Zone, the ordinances require environmental review and discretionary approval of: (1) certain new development, including the construction of certain structures and removal of native vegetation, that is proposed near natural waterbodies/riparian areas or important wildlife crossing structures (e.g., bridges, culverts), and (2) wildlife impermeable fencing that would enclose large areas. Outdoor lighting is also subject to new regulations in the HCWC Overlay Zone. In order to encourage the compact siting of new development in the CWPA overlay zone, which is a particularly sensitive wildlife movement area located within the larger HCWC Overlay Zone, certain proposed development requires environmental review and approval unless the development is sited near existing development.

Marine Mammal Protection Act

The Marine Mammal Protection Act (MMPA) (16 U.S.C. Chapter 31), first enacted in 1972, provides for protection of all marine mammals in the United States, including but not limited to whales, dolphins, seals, and sea lions. The MMPA provides that it shall be unlawful, with certain permitted exceptions, to take a marine mammal in waters of the United States. Under the MMPA, “take” is defined as “harass, hunt, capture, collect, or kill, or attempt to harass, hunt, capture, collect, or kill any marine mammal.”

ENVIRONMENTAL SETTING

In addition to the information provided in Section 8.2, “Biological Resources,” of the Background Report (Appendix B), the following information is relevant to evaluating the potential biological resources impacts of the 2040 General Plan.

Special-Status Plants

Section 8.2, “Biological Resources,” of the Background Report contains special-status plant species occurrence data based in part on a 2016 review of the California Natural Diversity Database (CNDDDB) (Appendix B). Based on an updated review of the CNDDDB, as well as a search of the California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants of California database and the U.S. Fish and Wildlife Service (USFWS) Information for Planning and Consultation database, there are 75 additional special-status plant species known or with potential to occur in Ventura County (Table 4.4-1) (CNDDDB 2019; CNPS 2019; USFWS 2019). Fifty-four of these additional species have California Rare Plant Ranks of 4, which means that these species may have limited distribution throughout California and may have local significance or rarity (Table 4.4-1). However, these species may not be considered rare by the California Endangered Species Act (CESA) or federal Endangered Species Act (ESA) standards. While some of these species may not be locally rare within the plan area of the 2040 General Plan, all of these species should be considered at a project level.

Table 4.4-1 Additional Special-Status Plant Species Known or with Potential to Occur in Ventura County

Species	Regulatory Status ¹			Habitat
	Federal	State	CRPR	
Chaparral sand-verbena <i>Abronia villosa</i> var. <i>aurita</i>	USFS-S	–	1B.1	Chaparral, coastal scrub, desert dunes. Sandy areas. 246–5,249 feet in elevation. Blooms January–September.
Marsh sandwort <i>Arenaria paludicola</i>	FE	SE	1B.1	Marshes and swamps. Growing up through dense mats of <i>Typha</i> , <i>Juncus</i> , <i>Scirpus</i> , etc. in freshwater marsh. Sandy soil. 10–558 feet in elevation. Blooms May–August.
Big Bear Valley milk-vetch <i>Astragalus lentiginosus</i> var. <i>sierrae</i>	USFS-S	–	1B.2	Stony meadows and open pinewoods; sandy and gravelly soils in a variety of habitats. 5,610–10,597 feet in elevation. Blooms April–August.
Big Bear Valley woollypod <i>Astragalus leucolobus</i>	–	–	1B.2	Lower montane coniferous forest, pebble plain, pinyon and juniper woodland, upper montane coniferous forest. Dry pine woods, gravelly knolls among sagebrush, or stony lake shores in the pine belt. 4,790–9,498 feet in elevation. Blooms May–July.
Ventura Marsh milk-vetch <i>Astragalus pycnostachyus</i> var. <i>lanosissimus</i>	FE	SE	1B.1	Marshes and swamps, coastal dunes, coastal scrub, salt marsh, wetland. Within reach of high tide or protected by barrier beaches, more rarely near seeps on sandy bluffs. 3–115 feet in elevation. Blooms June–October.
South coast saltscale <i>Atriplex pacifica</i>	–	–	1B.2	Alkali playa. Coastal scrub, coastal bluff scrub, playas, coastal dunes. Alkali soils. 3–1,312 feet in elevation. Blooms March–October.
Davidson’s saltscale <i>Atriplex serenana</i> var. <i>davidsonii</i>	–	–	1B.2	Coastal bluff scrub, coastal scrub. Alkaline soil. 33–656 feet in elevation. Blooms April–October.
Malibu baccharis <i>Baccharis malibuensis</i>	–	–	1B.1	Coastal scrub, chaparral, cismontane woodland, riparian woodland. In Conejo volcanic substrates, often on exposed roadcuts. Sometimes occupies oak woodland habitat. 492–1,050 feet in elevation. Blooms August.

Species	Regulatory Status ¹			Habitat
	Federal	State	CRPR	
Southern tarplant <i>Centromadia parryi</i> ssp. <i>australis</i>	–	–	1B.1	Salt marsh, wetland. Often in disturbed sites near the coast at marsh edges; also in alkaline soils sometimes with saltgrass. Sometimes on vernal pool margins. 0–3,199 feet in elevation. Blooms May–November.
Slender-horned spineflower <i>Dodecahema leptoceras</i>	FE	SE	1B.1	Chaparral, cismontane woodland, coastal scrub. Flood deposited terraces and washes. Sandy soils. 656–2,510 feet in elevation. Blooms April–June.
Santa Monica dudleya <i>Dudleya cymosa</i> ssp. <i>ovatifolia</i>	FT	–	1B.1	Chaparral, coastal scrub. In canyons on volcanic or sedimentary substrates; primarily on north-facing slopes. 492–1,099 feet in elevation. Blooms March–June.
Southern mountain buckwheat <i>Eriogonum kennedyi</i> var. <i>austromontanum</i>	FT	–	–	Lower montane coniferous forest. Usually found in pebble plain habitats. 5,791–9,908 feet in elevation. Blooms June–September.
Vernal barley <i>Hordeum intercedens</i>	–	–	3.2	Vernal pools, dry, saline streambeds, alkaline flats. 16–3,281 feet in elevation. Blooms March–June.
Coulter's goldfields <i>Lasthenia glabrata</i> ssp. <i>coulteri</i>	–	–	1B.1	Coastal salt marshes, playas, vernal pools. Usually found on alkaline soils in playas, sinks, and grasslands. 3–4,511 feet in elevation. Blooms February–June.
Payne's bush lupine <i>Lupinus paynei</i>	–	–	1B.1	Coastal scrub, riparian scrub, valley and foothill grassland. Sandy. 722–1,377 feet in elevation. Blooms March–April.
Southern curly-leaved monardella <i>Monardella sinuata</i> ssp. <i>sinuata</i>	–	–	1B.2	Coastal dunes, coastal scrub, chaparral, cismontane woodlands. Sandy soils. 0–984 feet in elevation. Blooms April–September.
San Joaquin woollythreads <i>Monolopia congdonii</i>	FE	–	1B.2	Chenopod scrub, valley and foothill grassland. Alkaline or loamy plains; sandy soils, often with grasses and within chenopod scrub. 180–2,756 feet in elevation. Blooms February–May.
Gambel's water cress <i>Nasturtium gambelii</i>	FE	ST	1B.1	Freshwater and brackish marshes at the margins of lakes and along streams, in or just above the water level. 16–1,083 feet in elevation. Blooms April–October.
Spreading navarretia <i>Navarretia fossalis</i>	FT	–	1B.1	Vernal pools, chenopod scrub, marshes and swamps, playas. San Diego hardpan and San Diego claypan vernal pools; in swales and vernal pools, often surrounded by other habitat types. 49–2,789 feet in elevation. Blooms April–June.
South coast branching phacelia <i>Phacelia ramosissima</i> var. <i>austrolitoralis</i>	–	–	3.2	Chaparral, coastal scrub, coastal dunes, coastal salt marsh. Sandy, sometimes rocky sites. 16–984 feet in elevation. Blooms March–August.
Hoffmann's bitter gooseberry <i>Ribes amarum</i> var. <i>hoffmannii</i>	–	–	3	Chaparral, riparian woodland. 16–3,904 feet in elevation. Blooms March–April.
California Rare Plant Rank 4 Plant Species				
Red sand-verbena <i>Abronia maritima</i>	–	–	4.2	Coastal dunes. 0–328 feet in elevation. Blooms February–November.
Heart-leaved thorn-mint <i>Acanthomintha obovata</i> ssp. <i>cordata</i>	–	–	4.2	Heavy adobe-clay soil. Grassy openings in woodland and chaparral. 2,575–5,052 feet in elevation. Blooms April–July.
Parish's oxytheca <i>Acanthoscyphus parishii</i> var. <i>parishii</i>	–	–	4.2	Chaparral, lower montane coniferous forest. Sandy or gravelly places. 4,003–8,530 feet in elevation. Blooms June–September.

Species	Regulatory Status ¹			Habitat
	Federal	State	CRPR	
Douglas' fiddleneck <i>Amsinckia douglasiana</i>	–	–	4.2	Valley and foothill grassland, oak woodland. Monterey shale; dry habitats. 0–6,398 feet in elevation. Blooms March–May.
Oval-leaved snapdragon <i>Antirrhinum ovatum</i>	–	–	4.2	From open hillsides to small vernal pools in clay or gypsum soils w/in grassland or woodland. Sites often alkaline. 656–3,281 feet in elevation. Blooms May–November.
Western spleenwort <i>Asplenium vespertinum</i>	–	–	4.2	Chaparral, cismontane woodland, coastal scrub. Rocky sites. 591–3,281 feet in elevation. Blooms February–June.
Salinas milk-vetch <i>Astragalus macrodon</i>	–	–	4.3	Chaparral, cismontane woodland, valley and foothill grassland. Open hillsides; sometimes follows burns, on bare ridges and along draws; shale, sandstone, and serpentine. 820–3,117 feet in elevation. Blooms April–July.
Plummer's baccharis <i>Baccharis plummerae</i> ssp. <i>plummerae</i>	–	–	4.3	Broadleaved upland forest, cismontane woodland, coastal scrub, chaparral. Brushy canyons and mountainsides near the sea; usually shaded north-facing slopes. Rocky substrates. 16–1,394 feet in elevation. Blooms May–October.
Brewer's calandrinia <i>Calandrinia breweri</i>	–	–	4.2	Chaparral, coastal scrub. Sandy or loamy soils. Disturbed sites, burns. 33–3,937 feet in elevation. Blooms March–June.
Catalina mariposa-lily <i>Calochortus catalinae</i>	–	–	4.2	Valley and foothill grassland, chaparral, coastal scrub, cismontane woodland. In heavy soils, open slopes, openings in brush. 49–2,297 feet in elevation. Blooms March–June.
Club-haired mariposa-lily <i>Calochortus clavatus</i> var. <i>clavatus</i>	USFS-S	–	4.3	Chaparral, cismontane woodland, valley and foothill grassland, coastal scrub. Generally, on serpentine clay, rocky soils. 246–4,265 feet in elevation. Blooms May–June.
Island mountain-mahogany <i>Cercocarpus betuloides</i> var. <i>blancheae</i>	–	–	4.3	Chaparral, closed-cone coniferous forest. 98–1,969 feet in elevation. Blooms February–May.
Seaside cistanthe <i>Cistanthe maritima</i>	–	–	4.2	Coastal bluff scrub, coastal scrub, valley and foothill grassland. Sea bluffs; sandy sites. 16–984 feet in elevation. Blooms March–June.
Monkey-flower savory <i>Clinopodium mimuloides</i>	–	–	4.2	Streambanks and mesic sites. 1,001–5,906 feet in elevation. Blooms June–October.
Unexpected larkspur <i>Delphinium inopinum</i>	USFS-S	–	4.3	Upper montane coniferous forest. On open rocky ridgetops; on metamorphics in red fir and western white pine forest. 6,201–9,186 feet in elevation. Blooms May–July.
Mt. Pinos larkspur <i>Delphinium parryi</i> ssp. <i>purpureum</i>	USFS-S	–	4.3	Pinyon-juniper woodland, Mojavean desert scrub, chaparral. 3,281–8,530 feet in elevation. Blooms May–June.
Western dichondra <i>Dichondra occidentalis</i>	–	–	4.2	Chaparral, cismontane woodland, coastal scrub, valley and foothill grassland. On sandy loam, clay, and rocky soils. 164–1,640 feet in elevation. Blooms March–July.
Small spikerush <i>Eleocharis parvula</i>	–	–	4.3	Salt marsh, Wetland. Marshes and swamps. In coastal salt marshes. 3–9,908 feet in elevation. Blooms June–August.
Elegant wild buckwheat <i>Eriogonum elegans</i>	–	–	4.3	Cismontane woodland, valley and foothill grassland. Usually in sandy or gravelly substrates; often in washes, sometimes roadsides. 656–5,003 feet in elevation. Blooms May–November.
Jepson's woolly sunflower <i>Eriophyllum jepsonii</i>	–	–	4.3	Coastal scrub, chaparral, cismontane woodland. Sometimes on serpentine. 656–3,363 feet in elevation. Blooms April–June.
Suffrutescent wallflower <i>Erysimum suffrutescens</i>	–	–	4.2	Coastal dunes, coastal scrub, coastal bluff scrub, chaparral. 0–492 feet in elevation. Blooms January–July.
Pine green-gentian <i>Frasera neglecta</i>	–	–	4.3	Lower montane coniferous forest, pinyon-juniper woodland, upper montane coniferous forest. Dry, open woodlands. 4,593–8,202 feet in elevation. Blooms May–July.
Stinkbells <i>Fritillaria agrestis</i>	–	–	4.2	Cismontane woodland, chaparral, valley and foothill grassland. Sometimes on serpentine; mostly found in nonnative grassland or in grassy openings in clay soil. 33–5,102 feet in elevation. Blooms March–June.

Species	Regulatory Status ¹			Habitat
	Federal	State	CRPR	
Pine fritillary <i>Fritillaria pinetorum</i>	–	–	4.3	Chaparral, lower montane coniferous forest, pinyon-juniper woodland, subalpine coniferous forest, upper montane coniferous forest. Granite or metamorphics. 5,692–10,827 feet in elevation. Blooms May–July.
Santa Barbara bedstraw <i>Galium clifftonsmithii</i>	–	–	4.3	Cismontane woodland. 656–4,003 feet in elevation. Blooms May–July.
Cuyama gilia <i>Gilia latiflora</i> ssp. <i>cuyamensis</i>	–	–	4.3	Pinyon and juniper woodland. Sandy flats, lower river valleys. 1,952–6,562 feet in elevation. Blooms April–June.
Pine gilia <i>Gilia leptantha</i> ssp. <i>pinetorum</i>	–	–	4.3	Lower montane coniferous forest. Rocky or sandy sites. 4,921–9,186 feet in elevation. Blooms May–July.
Urn-flowered alumroot <i>Heuchera caespitosa</i>	USFS-S	–	4.3	Lower montane coniferous forest, upper montane coniferous forest, cismontane woodland, riparian forest. Rocky sites. 3,789–8,694 feet in elevation. Blooms May–August.
San Gabriel Mountains hulsea <i>Hulsea vestita</i> ssp. <i>gabrielensis</i>	USFS-S	–	4.3	Lower montane coniferous forest, upper montane coniferous forest. Rocky sites. 4,921–8,202 feet in elevation. Blooms May–July.
Parry's hulsea <i>Hulsea vestita</i> ssp. <i>parryi</i>	–	–	4.3	Lower montane coniferous forest, upper montane coniferous forest, pinyon and juniper woodland. Rocky sites; limestone or granite; sagebrush to fir forest. 4,495–9,498 feet in elevation. Blooms April–August.
Southern California black walnut <i>Juglans californica</i>	–	–	4.2	Chaparral, coastal scrub, cismontane woodland. Slopes, canyons, alluvial habitats. 164–2,953 feet in elevation. Blooms March–August.
Southwestern spiny rush <i>Juncus acutus</i> ssp. <i>leopoldii</i>	–	–	4.2	Wetland. Salt marshes, alkaline seeps, coastal dunes. Moist saline places. 10–2,953 feet in elevation. Blooms May–June.
Ferris' goldfields <i>Lasthenia ferrisiae</i>	–	–	4.2	Vernal pools, wetland. Alkaline, clay soils. 66–2,297 feet in elevation. Blooms February–May.
Fragrant pitcher sage <i>Lepechinia fragrans</i>	USFS-S	–	4.2	Chaparral. 66–4,298 feet in elevation. Blooms March–October.
Spring lessingia <i>Lessingia tenuis</i>	–	–	4.3	Chaparral, cismontane woodland, lower montane coniferous forest. 984–7,054 feet in elevation. Blooms May–July.
Ocellated humboldt lily <i>Lilium humboldtii</i> ssp. <i>ocellatum</i>	–	–	4.2	Chaparral, coastal scrub, cismontane woodland, lower montane coniferous forest, riparian forest. Yellow-pine forest or openings, oak canyons. 98–5,906 feet in elevation. Blooms March–July.
Silky lupine <i>Lupinus elatus</i>	–	–	4.3	Lower montane coniferous forest, upper montane coniferous forest. 4,921–9,843 feet in elevation. Blooms June–August.
Dunedelion <i>Malacothrix incana</i>	–	–	4.3	Coastal dunes, coastal scrub. On flats and slopes, as well as unstabilized dunes near the ocean. 7–115 feet in elevation. Blooms January–October.
Dusky-fruited malacothrix <i>Malacothrix phaeocarpa</i>	–	–	4.3	Closed-cone coniferous forest, chaparral. Openings, burned, or disturbed areas. 328–4,593 feet in elevation. Blooms April–June.
Cliff malacothrix <i>Malacothrix saxatilis</i> var. <i>saxatilis</i>	–	–	4.2	Coastal bluff scrub, coastal scrub. 10–656 feet in elevation. Blooms March–September.
California spineflower <i>Mucronea californica</i>	–	–	4.2	Chaparral, cismontane woodland, coastal dunes, coastal scrub, valley and foothill grassland. Sandy soils. 0–4,593 feet in elevation. Blooms March–July.

Species	Regulatory Status ¹			Habitat
	Federal	State	CRPR	
Fragile pentachaeta <i>Pentachaeta fragilis</i>	–	–	4.3	Chaparral, lower montane coniferous forest. Sandy soils. 148–6,890 feet in elevation. Blooms March–June.
Adobe yampah <i>Perideridia pringlei</i>	–	–	4.3	Chaparral, cismontane woodland, pinyon and juniper woodland, coastal scrub. Serpentine, clay soils. Grassland hillsides; seasonally wet sites. 984–5,906 feet in elevation. Blooms April–June.
Transverse Range phacelia <i>Phacelia exilis</i>	–	–	4.3	Meadows and seeps, lower montane coniferous forest, upper montane coniferous forest, pebble plain. Sandy or rocky slopes, flats, meadows. 3,609–8,858 feet in elevation. Blooms May–August.
Hubby's phacelia <i>Phacelia hubbyi</i>	–	–	4.2	Chaparral, coastal scrub, valley and foothill grassland. Gravelly, rocky areas and talus slopes. 0–3,281 feet in elevation. Blooms April–July.
Mojave phacelia <i>Phacelia mohavensis</i>	–	–	4.3	Cismontane woodland, lower montane coniferous forest, dry meadows, pinyon-juniper woodland. Sandy or gravelly soils, dry streambeds. 4,593–8,202 feet in elevation. Blooms April–August.
Chaparral rein orchid <i>Piperia cooperi</i>	–	–	4.2	Chaparral, cismontane woodland, valley and foothill grassland. 49–607 feet in elevation. Blooms March–June.
Michael's rein orchid <i>Piperia michaelii</i>	–	–	4.2	Coastal bluff scrub, coastal scrub, cismontane woodland, chaparral, closed-cone coniferous forest, lower montane coniferous forest. Mudstone and humus, generally dry sites. 10–3,002 feet in elevation. Blooms April–August.
Fish's milkwort <i>Polygala cornuta</i> var. <i>fishiae</i>	–	–	4.3	Cismontane woodland, riparian woodland, chaparral. Scree slopes, brushy ridges, and along creeks; often with oaks. 328–3,281 feet in elevation. Blooms May–August.
Chickweed oxytheca <i>Sidotheca caryophylloides</i>	USFS-S	–	4.3	Lower montane coniferous forest. Sandy sites. 3,658–8,530 feet in elevation. Blooms July–September.
San Diego County needle grass <i>Stipa diegoensis</i>	–	–	4.2	Chaparral, coastal scrub. Rocky slopes, sea cliffs and stream banks; often in mesic sites. 33–2,625 feet in elevation. Blooms February–June.
Woolly seablite <i>Suaeda taxifolia</i>	–	–	4.2	Wetland. Coastal bluff scrub, coastal dunes, marshes and swamps. Margins of salt marshes. 0–164 feet in elevation. Blooms January–December.
Lemmon's syntrichopappus <i>Syntrichopappus lemmonii</i>	–	–	4.3	Chaparral, Joshua tree woodland, pinyon and juniper woodland. Decomposed granite; sandy or gravelly soils. 1,640–6,004 feet in elevation. Blooms April–May.
Silvery false lupine <i>Thermopsis californica</i> var. <i>argentata</i>	–	–	4.3	Lower montane coniferous forest, pinyon-juniper woodland. 2,182–5,233 feet in elevation. Blooms April–October.

Notes: CRPR = California Rare Plant Rank.

¹ Legal Status Definitions

Federal:

FE Federally Listed as Endangered (legally protected by ESA)

FT Federally Listed as Threatened (legally protected by ESA)

USFS-S U.S. Forest Service Sensitive

State:

SE State Listed as Endangered (legally protected by CESA)

California Rare Plant Ranks:

1B Plant species considered rare or endangered in California and elsewhere (protected under CEQA, but not legally protected under the ESA or CESA)

3 Lacking the necessary information to assign the plant species to one of the other ranks or to reject them.

4 Plant species of limited distribution or infrequent throughout a broader area in California.

Threat Ranks:

0.1 Seriously threatened in California (over 80% of occurrences threatened; high degree and immediacy of threat)

0.2 Moderately threatened in California (20-80% occurrences threatened; moderate degree and immediacy of threat)

0.3 Not very threatened in California (less than 20% of occurrences threatened / low degree and immediacy of threat or no current threats known)

Sources: CNDDDB 2019; CNPS 2019; USFWS 2019

Special-Status Wildlife

The Background Report contains special-status wildlife species occurrence data based partly on a 2016 review of the CNDDDB (Section 8.2, “Biological Resources,” of Appendix B). Based on an updated review of the CNDDDB and the USFWS Information for Planning and Consultation database, there are 10 additional special-status wildlife species that are known or have potential to occur in the county (Table 4.4-2) (CNDDDB 2019). Additionally, the regulatory status of three species has changed since completion of the Background Report. Tricolored blackbird (*Agelaius tricolor*) is now listed as threatened under CESA, crotch bumble bee (*Bombus crotchii*) is now a candidate for listing under CESA, and Townsend’s big-eared bat (*Corynorhinus townsendii*) is no longer a candidate for listing under CESA (Table 4.4-2).

Table 4.4-2 Additional Special-Status Wildlife Species Known of with Potential to Occur in Ventura County and Recent Status Changes

Species	Regulatory Status ¹		Habitat
	Federal	State	
California glossy snake <i>Arizona elegans occidentalis</i>	–	SSC	Patchily distributed from the eastern portion of San Francisco bay, southern San Joaquin Valley, and the Coast, Transverse, and Peninsular Ranges south to Baja California. Generalist reported from a range of scrub and grassland habitats, often with loose or sandy soils.
Northern California legless lizard <i>Anniella pulchra</i>	USFS-S	SSC	Chaparral, coastal dunes, and coastal scrub. Sandy or loose loamy soils under sparse vegetation. Soil moisture is essential. They prefer soils with a high moisture content.
Southern California legless lizard <i>Anniella stebbinsi</i>	USFS-S	SSC	Generally south of the Transverse Range, extending to northwestern Baja California. Occurs in sandy or loose loamy soils under sparse vegetation. Disjunct populations in the Tehachapi and Piute Mountains in Kern County. Variety of habitats; generally in moist, loose soil. They prefer soils with a high moisture content.
Ringtail <i>Bassariscus astutus</i>	–	FP	Riparian habitats, forest habitats, and shrub habitats in lower to middle elevations. Usually found within 0.6 mile of a permanent water source.
Green sea turtle <i>Chelonia mydas</i>	FT	–	Marine. Completely herbivorous; requires adequate supply of seagrasses and algae.
Giant kangaroo rat <i>Dipodomys ingens</i>	FE	SE	Annual grasslands on the western side of the San Joaquin Valley, marginal habitat in alkali scrub. Need level terrain and sandy loam soils for burrowing.
American peregrine falcon <i>Falco peregrinus anatum</i>	FD	SD FP	Near wetlands, lakes, rivers, or other water; on cliffs, banks, dunes, mounds; also, human-made structures. Nest consists of a scrape or a depression or ledge in an open site.
California black rail <i>Laterallus jamaicensis coturniculus</i>	–	ST FP	Inhabits freshwater marshes, wet meadows and shallow margins of saltwater marshes bordering larger bays. Needs water depths of about 1 inch that do not fluctuate during the year and dense vegetation for nesting habitat.
Foothill yellow-legged frog <i>Rana boylei</i>	USFS-S	SC SSC	Partly-shaded, shallow streams and riffles with a rocky substrate in a variety of habitats. Need at least some cobble-sized substrate for egg-laying. Need at least 15 weeks to attain metamorphosis.
San Joaquin kit fox <i>Vulpes macrotis mutica</i>	FE	ST	Annual grasslands or grassy open stages with scattered shrubby vegetation. Need loose-textured sandy soils for burrowing, and suitable prey base.
Recent Status Changes			
Tricolored blackbird <i>Agelaius tricolor</i>	–	ST SSC	Freshwater marsh, marsh and swamp, swamp, wetland. Highly colonial species, most numerous in Central Valley and vicinity. Largely endemic to California. Requires open water, protected nesting substrate, and foraging area with insect prey within a few kilometers of the colony.

Species	Regulatory Status ¹		Habitat
	Federal	State	
Crotch bumblebee <i>Bombus crotchii</i>	–	SC	Coastal California east to the Sierra-Cascade crest and south into Mexico.
Townsend's big-eared bat <i>Corynorhinus townsendii</i>	USFS-S	SSC	Broadleaved upland forest, chaparral, chenopod scrub, Great Basin grassland, Great Basin scrub, Joshua tree woodland, lower montane coniferous forest, meadow & seep, Mojavean desert scrub, riparian forest, riparian woodland, Sonoran desert scrub. Throughout California in a wide variety of habitats. Most common in mesic sites. Roosts in the open, hanging from walls and ceilings. Roosting sites limiting. Extremely sensitive to human disturbance.

Notes: CNDDDB = California Natural Diversity Database.

¹ Legal Status Definitions

Federal:

FE Endangered (legally protected)

FT Threatened (legally protected)

FD Delisted

USFS-S U.S. Forest Service Sensitive

State:

FP Fully protected (legally protected)

SSC Species of special concern (no formal protection other than CEQA consideration)

SE Endangered (legally protected)

ST Threatened (legally protected)

SD Delisted

SC Candidate (legally protected)

Sources: CNDDDB 2019; USFWS 2019

Sensitive Natural Communities

The January 2020 Background Report contains a discussion regarding vegetation communities and land cover types (Section 8.2, “Biological Resources”, Appendix B), including sensitive habitats. Sensitive habitats may be of special concern to regulatory agencies and conservation organizations for a variety of reasons, including their locally or regionally declining status, or because they provide important habitat to common and special-status species. Sensitive habitat types include those that are of special concern to the California Department of Fish and Wildlife (CDFW) or that are afforded specific consideration through CEQA, Section 1602 of the California Fish and Game Code, the Porter-Cologne Water Quality Control Act, and Section 404 of the Clean Water Act. Several of these sensitive habitats were considered in the Background Report.

CDFW maintains a list of plant communities that are native to California. Within that list, CDFW identifies special-status plant communities (i.e., sensitive natural communities), which it defines as communities that are of limited distribution Statewide or within a county or region and are often vulnerable to environmental effects of projects. These communities may or may not contain special-status species or their habitat. Known occurrences of sensitive natural communities are included in the CNDDDB; however, no new occurrences have been added to the CNDDDB since the mid-1990s when funding was cut for this portion of the CNDDDB program. The sensitive natural communities included in the CNDDDB are based on the Holland 1986 classification which is not consistent with the State’s current vegetation mapping and classification standards and this legacy data is currently being validated by CDFW. Nonetheless, CDFW recommends that the existence of these legacy records should be addressed in the environmental review processes of CEQA. Twenty-two sensitive natural communities were reported in the CNDDDB legacy data and occur within Ventura County in addition to the sensitive habitats discussed in the Background Report (Table 4.4-3).

Table 4.4-3 Additional Sensitive Natural Communities Known to Occur in Ventura County

Sensitive Natural Community	Description
Southern California Coastal Lagoon	Southern California coastal lagoons are shallow inland water bodies, separated from the ocean by a barrier, and are typically associated with transitional zones between river mouths and the ocean.
Southern California Steelhead Stream	Southern California steelhead streams provide suitable habitat for the Southern California DPS steelhead (<i>Oncorhynchus mykiss irideus</i>).
Southern California Threespine Stickleback Stream	Southern California threespine stickleback streams provide suitable habitat for the threespine stickleback (<i>Gasterosteus aculeatus</i>).
Southern Foredunes	Southern foredunes habitat are located along sandy beaches and are associated with perennial, woody plant species.
Southern Dune Scrub	Southern dune scrub habitat is associated with coastal areas and contains scattered shrubs, subshrubs, and herbaceous vegetation. Characteristic species include saltbush (<i>Atriplex</i> spp.), goldenbush (<i>Isocoma</i> spp.), and lupine (<i>Lupinus</i> spp.).
Southern Coastal Bluff Scrub	Southern coastal bluff scrub habitat occurs on headlands and uplands.
Maritime Succulent Scrub	Maritime succulent scrub habitat contains features of coastal scrub habitat with the addition of succulent species, including <i>Dudleya</i> spp. and prickly pear (<i>Opuntia</i> spp.). In Ventura County, this habitat is only known to occur on Anacapa Island, which is outside of the plan area of the 2040 General Plan.
Valley Needlegrass Grassland	Valley needlegrass grassland is associated with two needlegrass species: purple needle grass (<i>Stipa pulchra</i>) and nodding needle grass (<i>Stipa cernua</i>).
Southern Coastal Salt Marsh	Southern coastal saltmarsh habitat contains wetlands associated with plant species such as pickleweed (<i>Salicornia</i> spp.), Pacific cordgrass (<i>Spartina foliosa</i>), and bird's beak (<i>Cordylanthus</i> spp.).
Cismontane Alkali Marsh	Cismontane alkali marsh habitat contains wetlands dominated by low, perennial, herbaceous plants adapted to wetlands.
Coastal and Valley Freshwater Marsh	Coastal and valley freshwater marsh habitat contains wetland habitat, typically around the margins of lakes, streams, and seeps. This habitat is typically dominated by cattail (<i>Typha</i> spp.), sedge (<i>Carex</i> spp.), and bulrush (<i>Scirpus</i> spp.).
Southern Riparian Forest	Southern riparian forest habitat includes a closed canopy overstory of Fremont cottonwood (<i>Populus fremontii</i>), black cottonwood (<i>Populus trichocarpa</i>), western sycamore (<i>Platanus racemosa</i>), and willow (<i>Salix</i> spp.) and an understory of mule fat (<i>Baccharis viminea</i>) and willow baccharis (<i>Baccharis salicina</i>).
Southern Coast Live Oak Riparian Forest	Southern coast live oak riparian forest includes a dense riparian forest near streams dominated by coast live oak (<i>Quercus agrifolia</i>) with an herbaceous understory.
Southern Cottonwood Willow Riparian Forest	Southern cottonwood willow riparian forest habitat is similar to southern riparian forest and is dominated by cottonwoods and willows.
Southern Mixed Riparian Forest	Southern mixed riparian forest is similar to southern riparian forest, but also contains coast live oak.
Canyon Live Oak Ravine Forest	Canyon live oak ravine forest habitat is a riparian forest habitat, dominated by various oak species (<i>Quercus</i> spp.), and may include other tree species including big leaf maple (<i>Acer macrophyllum</i>), and California bay (<i>Umbellularia californica</i>).
Southern Sycamore Alder Riparian Woodland	Southern sycamore alder riparian forest contains an overstory of primarily California sycamore (<i>Platanus racemosa</i>) and a dense understory of salt marsh baccharis (<i>Baccharis douglasii</i>) and willow.
Southern Riparian Scrub	Southern riparian scrub habitat typically contains an open overstory of coast live oak and is dominated by shrub species including California sagebrush (<i>Artemisia californica</i>), black sage (<i>Salvia leucophylla</i>), and white sage (<i>Salvia apiana</i>).

Sensitive Natural Community	Description
Southern Willow Scrub	Southern willow scrub habitat is dominated by various willow species and also may include Fremont cottonwood and California sycamore. This habitat is often associated with major rivers in southern California.
Valley Oak Woodland	Valley oak woodland habitat is dominated by valley oak (<i>Quercus lobata</i>) and is frequently associated with riparian habitat.
California Walnut Woodland	California walnut (<i>Juglans californica</i>) woodland habitat contains California walnut, coast live oak, and California sagebrush (<i>Artemisia californica</i>).
Walnut Forest	Walnut forest habitat contains similar species assemblages as California walnut woodland, while forming a closed canopy.

Note: CNDDDB = California Natural Diversity Database.

Source: CNDDDB 2019

Native Wildlife Nursery Sites

The Background Report (Section 8.2, “Biological Resources,” Appendix B) does not contain a discussion regarding native wildlife nursery sites which are included in Appendix G question IV.b. Nursery sites are locations where fish and wildlife concentrate for hatching and/or raising young, such as nesting rookeries for birds, spawning areas for native fish, fawning areas for deer, monarch overwintering sites, and maternal roosts for bats. Nursery sites are considered for native wildlife that are not defined and otherwise considered under CEQA as special-status species. The county could contain a variety of wildlife nursery sites. Native nursery sites are not mapped for the plan area and would need to be identified and evaluated at a project-specific level.

4.4.2 Environmental Impacts and Mitigation Measures

METHODOLOGY

This program-level analysis identifies the potential impacts of implementation of the 2040 General Plan on biological resources. To perform this analysis, the following existing data sources were reviewed to determine the known distribution of biological resources: the Background Report; the County’s aerial imagery and other relevant biological GIS data layers such as wetlands, waterbodies, vegetation, habitat connectivity and wildlife corridors; and updated CNDDDB, CNPS Inventory of Rare and Endangered Plants of California database, and USFWS Information for Planning and Consultation database search results (CNDDDB 2019; CNPS 2019; USFWS 2019).

The analysis evaluates potential biological resources impacts based on the future development that could occur as a result of 2040 General Plan implementation. The relative location of future development is then compared to known special-status species ranges; known occurrences of special-status species and habitats; known locations of sensitive habitats, including sensitive natural communities, riparian habitat, and waters of the United States and State; wildlife movement corridors; and wildlife nursery sites (e.g., heron rookeries, deer fawning areas, monarch butterfly overwintering areas, bat roosts). The analysis evaluates the ability of 2040 General Plan policies and implementation programs to avoid or substantially reduce adverse impacts on biological resources.

Impacts evaluated include permanent and temporary and direct and indirect impacts resulting from future development under the 2040 General Plan. Future development would involve construction activities such as ground disturbance, grading, vegetation removal, placement of new structures and roads, and potentially increased human activity. These activities could result in the direct loss or injury of special-status species or loss or degradation of sensitive habitats if present within the footprint of a given project. Implementation of the 2040 General Plan could also result in conversion of special-status species habitat, potentially resulting in indirect impacts (i.e., physical changes in the environment which are not immediately related to a project, but which are caused indirectly by a project) on special-status species, wildlife corridors, and native wildlife nursery sites, including displacement of wildlife species from occupied habitat, special-status species habitat fragmentation and edge effects, introduction of invasive nonnative plant or wildlife species, increased or polluted water runoff, increased levels of noise or nighttime lighting, alteration of stream flow characteristics or fire cycles, and increased human activity as a result of increased development intensity.

THRESHOLDS OF SIGNIFICANCE

As discussed in the “Approach to the Environmental Analysis” section, the thresholds used to determine the significance of the 2040 General Plan’s impacts are based on the County’s adopted Initial Study Assessment Guidelines (ISAG), which include threshold criteria to assist in the evaluation of significant impacts for individual projects. Appendix G of the State CEQA Guidelines also provides considerations for determining the significance of a project’s impacts, in the form of initial study checklist questions.

To develop thresholds of significance for this section of the draft EIR, the County has deviated from the ISAG threshold criteria, where appropriate, to appropriately consider the programmatic nature of a general plan for the entire unincorporated area and to incorporate the 2019 revisions to the Appendix G checklist.

Specifically, the ISAG Sections 4.D.2a, 4.D.2c, 9D.1, and 9D.2 regarding sensitive plant communities, Environmentally Sensitive Habitat Areas (ESHA), coastal beaches, and sand dunes were combined in order to reduce repetition. Additionally, riparian habitat and other sensitive natural communities were added to this threshold. While riparian habitat and sensitive natural communities likely fall into the category of sensitive plant communities, these habitats have been explicitly identified for consistency with Appendix G question IV.b.

ISAG Section 4.D.3 regarding native resident or migratory fish or wildlife species and established native resident or migratory wildlife corridors was edited to include native wildlife nursery sites to reflect Appendix G, question IV.d. Two thresholds not included in ISAG were added for consistency with Appendix G, Section IV.e and IV.f, regarding consistency with local policies or ordinances protecting biological resources and Habitat Conservation Plans and Natural Community Conservation Plans.

For the purpose of this draft EIR, implementation of the 2040 General Plan would have a significant biological resources impact if it would:

- ▶ Reduce a plant or animal species’ population, reduce a plant or animal species’ habitat (including roosting sites), increase habitat fragmentation, or restrict reproductive capacity.

The following types of impacts on plant and animal species or their habitats are considered potentially significant:

- Loss of one or more individuals, occupied habitat, or critical habitat designated by the USFWS, of a species officially listed as Endangered, Threatened, or Rare under the federal ESA or CESA, a Candidate species, or a California fully protected species.
 - Impacts that would eliminate or threaten to eliminate one or more element occurrences of a special-status species not otherwise listed under the ESA or CESA, or as a Candidate species or California fully protected species.
 - Impacts that would threaten the viability of a habitat that sustains a population of a special-status wildlife species.
 - Impacts that would restrict the reproductive capacity of a special-status species.
 - “Take” of birds protected under the California Fish and Game Code and the federal Migratory Bird Treaty Act (MBTA), as “take” is defined in the California Fish and Game Code and MBTA.
 - Increases in noise and/or nighttime lighting to a level above ambient levels that would adversely affect a special-status species.
 - Increases in human access, predation or competition from domestic animals, pests or exotic species, or other indirect impacts, to levels that would adversely affect special-status species.
 - Impacts severe enough to substantially reduce the habitat of a wildlife species or cause a wildlife population to decline substantially or drop below self-sustaining levels, pursuant to Section 15065 of the CEQA Guidelines, Mandatory Findings of Significance.
- ▶ Have a substantial adverse effect on any riparian habitat, sensitive plant community, coastal ESHA, or other sensitive natural community identified in local or regional plans, policies, regulations, or by CDFW or USFWS through the following actions:
- Construction, grading, clearing, or other activities that would temporarily or permanently remove riparian habitat, sensitive plant communities, ESHA, or other sensitive natural communities; or disturb ESHA buffers (ESHA buffers are within 100 feet of the boundary of ESHA as defined in Section 8172-1 of the Coastal Zoning Ordinance). Temporary impacts on sensitive plant communities would be considered significant unless the habitat is restored once the temporary impact is complete.
 - Indirect impacts resulting from project operation at levels that would degrade the health of riparian habitat, a sensitive plant community, ESHA, or other sensitive natural community.
 - Any project that causes a direct or indirect adverse physical change to a coastal beach or sand dune, which is inconsistent with any of the coastal beaches and coastal sand dunes policies of the California Coastal Act, corresponding Coastal Act regulations, Ventura County Coastal Area Plan, or the Ventura County General Plan Goals, Policies and Programs, will be considered to result in a significant environmental impact.

- ▶ Have a substantial adverse effect on wetlands and other waters (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means. Adverse effects would include impacts to the entire aquatic or wetland ecosystem and impacts within the watershed that would adversely affect the aquatic or wetland ecosystem. The following types of impacts on wetlands and other waters are considered potentially significant:
 - Any of the following activities: removal of vegetation; grading; obstruction or diversion of water flow; change in velocity, siltation, volume of flow, or runoff rate; placement of fill; placement of structures; construction of a road crossing; placement of culverts or other underground piping; or any disturbance of the substratum.
 - Disruptions to wetland or riparian plant communities that would isolate or substantially interrupt contiguous habitats, block seed dispersal routes, or increase vulnerability of wetland species to exotic weed invasion or local extirpation. An example would be disruption of adjacent upland vegetation to a level that would adversely affect the ecological function of the wetland, such as where such vegetation plays a critical role in supporting riparian-dependent wildlife species (e.g., amphibians), or where such vegetation aids in stabilizing steep slopes adjacent to the riparian habitat, which reduces erosion and sedimentation potential.
 - Interference with ongoing maintenance of hydrological conditions in a water or wetland. The hydrology of wetlands systems must be maintained if their function and values are to be preserved. Adverse hydrological changes might include altered freshwater input; changes in the watershed area or run-off quantity, quality, or velocity; drawing down of the groundwater table to the detriment of groundwater-dependent habitat; substantial increases in sedimentation; introduction of toxic elements or alteration of ambient water temperature.
 - The project does not provide an adequate buffer for protecting the functions and values of existing waters or wetlands. The buffer is measured from the top-of-bank or edge of wetland or riparian habitat, whichever is greater.
- ▶ Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites through removal of habitat within a wildlife movement corridor; isolation of habitat; construction or creation of barriers that impede fish or wildlife movement, migration, or long-term connectivity; or intimidation of fish or wildlife via the introduction of noise, light, development or increased human presence. The following types of impacts on habitat connectivity are considered potentially significant:
 - A habitat connectivity feature (e.g., linkage, corridor, chokepoint, stepping stone) would be severed, substantially interfered with, or potentially blocked.
 - Wildlife access to foraging habitat, breeding habitat, water sources, or other areas necessary for their reproduction would be prevented or substantially interfered with.
 - Wildlife would be forced to use routes that endanger their survival. For example, constraining a corridor for mule deer (*Odocoileus hemionus*) or mountain lion (*Puma*

concolor) to an area that is not well-vegetated or that runs along a road instead of through a stream corridor or along a ridgeline.

- Lighting, noise, domestic animals, or other indirect impacts that could hinder or discourage fish and/or wildlife movement within habitat connectivity feature would be introduced.
 - The width of linkage, corridor, or chokepoint would be reduced to less than the sufficient width for movement of the target species (the species relying upon the connectivity feature). The adequacy of the width shall be based on the biological information for the target species; the quality of the habitat within and adjacent to the linkage, corridor, or chokepoint; topography; and adjacent land uses.
 - For wildlife relying on visual cues for movement, visual continuity (i.e., lines-of-sight) across highly constrained wildlife corridors, such as highway crossing structures or stepping stones, would not be maintained.
- ▶ Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.
 - ▶ Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan.

ISSUES NOT DISCUSSED FURTHER

Consistency with Adopted Habitat Conservation Plans

No habitat conservation plans or natural community conservation plans have been adopted within the plan area of the 2040 General Plan. This issue is not discussed further.

2040 GENERAL PLAN POLICIES AND IMPLEMENTATION PROGRAMS

Policies and implementation programs in the 2040 General Plan related to biological resources and, specifically, the thresholds of significance identified above, include the following.

Conservation and Open Space Element

- ▶ **Policy COS-1.1: Protection of Sensitive Biological Resources.** 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. (MPSP, IGC, RDR) *[Source: Existing GPP Policy 1.5.2.1 and 1.5.2.2 modified]*
- ▶ **Policy COS-1.2: Consideration of Sensitive Biological Resources.** The County shall identify sensitive biological resources as part of any land use designation change to the General Plan Land Use Diagram or zone designation change to the Zoning Ordinance that would intensify the uses in a given area. The County shall prioritize conservation of areas with sensitive biological resources. (MPSP) *[Source: New Policy]*

- ▶ **Policy COS-1.3: Wildlife Corridor Crossing Structures.** Based on the review and recommendation of a qualified biologist, the design and maintenance of road and floodplain improvements, including culverts and bridges, shall incorporate all feasible measures to accommodate wildlife passage. (RDR, MPSP) *[Source: Existing GPP Policy 1.5.2.6, modified pursuant to Wildlife Corridor Policy 3/19/19]*
- ▶ **Policy COS-1.4: Consideration of Impacts to Wildlife Movement.** When considering proposed discretionary development, County decision-makers shall consider the development's potential project-specific and cumulative impacts on the movement of wildlife at a range of spatial scales including local scales (e.g., hundreds of feet) and regional scales (e.g., tens of miles). (RDR) *[Source: Wildlife Corridor Policy 3/19/19]*
- ▶ **Policy COS-1.5: Development within Habitat Connectivity and Wildlife Corridors.** Development within the Habitat Connectivity and Wildlife Corridors overlay zone and Critical Wildlife Passage Areas overlay zone shall be subject to the applicable provisions and standards of these overlay zones as set forth in the Non-Coastal Zoning Ordinance. (RDR) *[Source: Existing GPP Policy 1.5.2.8; Wildlife Corridor Policy 3/19/19]*
- ▶ **Policy COS-1.6: Discretionary Development on Hillsides and Slopes.** 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. (RDR, MPSP) *[Source: New Policy]*
- ▶ **Policy COS-1.7: Balancing Resource Preservation and Flood Protection.** The County shall require that discretionary development and County-initiated projects balance the preservation of streams, wetlands, and riparian habitats with the need to adequately protect public safety and property from flooding hazards by incorporating natural or nature-based flood control infrastructure, (e.g., wetland restoration, soil conservation, vegetated levees), when feasible. (MPSP) *[Source: Existing Ojai Valley Area Plan Goal 1.4.1.2, modified]*
- ▶ **Policy COS-1.8: Bridge Crossing Design.** The County shall require discretionary development that includes new or modified road crossings over streams, wetlands and riparian habitats to include bridging design features with bridge columns located outside the riparian habitat areas, when feasible. (RDR) *[Source: New Policy]*
- ▶ **Policy COS-1.9: Agency Consultation Regarding Biological Resources.** The County shall consult with the California Department of Fish and Wildlife, the Regional Water Quality Control Board, 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. (MPSP, IGC, RDR) *[Source: Existing GPP Policy 1.5.2.5, modified]*
- ▶ **Policy COS-1.10: Evaluation of Potential Impacts of Discretionary Development on Wetlands.** The County shall require discretionary development that is proposed to be located within 300 feet of a wetland to be evaluated by a County-approved biologist for potential impacts on the wetland and its associated habitats pursuant to the applicable provisions of

the County's Initial Study Assessment Guidelines. (RDR) [Source: Existing GPP Policy 1.5.2.3 modified]

- ▶ **Policy COS-1.11: Discretionary Development Sited Near Wetlands.** The County shall require discretionary development to be sited 100 feet from wetland habitats, except as provided below. The 100-foot setback may be increased or decreased based upon an evaluation and recommendation by a qualified biologist and approval by the decision-making body based on factors that include, but may not be limited to soil type, slope stability, drainage patterns, the potential for discharges that may impair water quality, presence or absence of endangered, threatened or rare plants or animals, direct and indirect effects to wildlife movement, and compatibility of the proposed development with use of the wetland habitat area by wildlife. Discretionary development that would have a significant impact on a wetland habitat shall be prohibited unless mitigation measures are approved that would reduce the impact to a less than significant level. Notwithstanding the foregoing, discretionary development that would have a significant impact on a wetland habitat on land within a designated Existing Community may be approved in conjunction with the adoption of a statement of overriding considerations by the decision-making body. (RDR) [Source: Existing GPP Policies 1.5.2.3 and 1.5.2.4, modified]
- ▶ **Policy COS-1.12: Discretionary Development and Landscaping.** 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. (RDR) [Source: New Policy]
- ▶ **Policy COS-1.13: Partnerships for Protection of Natural and Biological Resources.** The County shall continue to work in partnership with agencies, organizations, and entities responsible for the protection, management, and enhancement of the county's biological resources. (IGC) [Source: Existing GPP Goal 1.1.1.3, modified]
- ▶ **Policy COS-1.14: Ecological Information Programs.** The County shall support programs that encourage awareness and respect for the natural environment. (PI) [Source: New Policy]
- ▶ **Policy COS-1.15: Countywide Tree Planting.** The County shall establish and support a countywide target for the County, cities in Ventura County, agencies, organizations, businesses, and citizens to plant two million trees throughout the county by 2040. (SO, JP, IGC) [New Policy]
- ▶ **Policy COS-2.1: Beach Erosion.** The County shall strive to minimize the risk from the damaging effects of coastal wave hazards and beach erosion and reduce the rate of beach erosion. (MPSP, RDR, IGC) [Source: Existing GPP Goal 2.12.1.1 and 2.12.1.2, combined]
- ▶ **Policy COS-2.2: Beach Nourishment.** The County shall support activities that trap or add sand through beach nourishment, dune restoration, and other adaptation strategies to enhance or create beaches in areas susceptible to sea-level rise and coastal flooding. (MPSP) [Source: New Policy]

- ▶ **Policy COS-2.4: Mining Activities.** The County shall require discretionary development for all mining activities in County streams and rivers to incorporate all feasible measures to mitigate beach sand replenishment impacts. (RDR) *[Source: Existing GPP Policy 1.10.2.4, modified]*
- ▶ **Policy COS-2.5: Shoreline Protective Structure Design.** The County shall require all shoreline protective structures which alter natural shoreline processes to be designed to eliminate or mitigate adverse impacts on local shoreline sand supplies. (MPSP, IGC) *[Source: Existing GPP Policy 1.10.2.3]*
- ▶ **Policy COS-2.8: Coastal Fisheries.** The County shall encourage community programs that are designed to improve the quality of coastal fisheries and marine resources (PSR, IGC) *[Source: New Policy]*
- ▶ **Policy COS-2.9: Estuarine Protections.** The County shall support efforts by other agencies and organizations to maintain and enhance estuarine systems in order to protect and enhance coastal fisheries and other marine resources. (PSR, IGC) *[Source: New Policy]*
- ▶ **Policy COS-2.10: Saltwater Intrusion.** The County shall work with Federal, State, and local jurisdictions, agencies, and organizations to monitor saltwater intrusion and take proactive steps to reduce intrusion, including:
 - working to maintain and restore coastal wetlands buffers;
 - enhancing groundwater management to prevent excessive pumping in order to restore groundwater levels needed to reduce saltwater intrusion; and
 - implementing mitigation measures to prevent saltwater intrusion into estuaries and groundwater basins including, but not limited to, implementation of reactive barriers and use of pumps to divert saltwater.

(PSR, IGC, JP) *[Source: New Policy, OPR Sea-Level Rise Guidance]*
- ▶ **Policy COS-2.11: Dune Vegetation.** Discretionary development which would result in the removal of dune vegetation shall be conditioned to replace the vegetation. (RDR) *[Source: Existing GPP Policy 1.10.2.2]*
- ▶ **Policy COS 9.3: Open Space Preservation.** The County shall place a high priority on preserving open space lands for recreation, habitat protection, wildlife movement, flood hazard management, public safety, water resource protection, and overall community benefit. (PSP) *[Source: New Policy]*

Implementation Programs

- ▶ **Program A: Standards for Compact Development.** The County shall update the Non-Coastal Zoning Ordinance to include development standards for project design that features compact development adjacent to scenic or sensitive biological resources. *[Source: New Program]*
- ▶ **Program B: Update Initial Study Assessment Guidelines.** The County shall update the Initial Study Assessment Guidelines to identify a range of mitigation measures for protected biological resources. This will include updating Section 4, Biological Resources, to include

the following California Environmental Quality Act (CEQA) policy language regarding compensatory mitigation: “When there is no other feasible alternative to avoiding an impact to a wetland habitat, the County shall require the discretionary development to provide restoration and/or replacement habitat as compensatory mitigation such that no overall net loss of wetland habitat results from the development. The restoration and/or replacement habitat shall be ‘in kind’ (i.e. same type and acreage) and provide wetland habitat of comparable biological value. On-site restoration and/or replacement shall be preferred wherever possible. A habitat restoration and/or replacement plan to describe and implement such compensatory mitigation shall be developed in consultation with all agencies that have jurisdiction over the resource.” *[Source: Existing GPP Policy 1.5.2.4, modified]*

- ▶ **Program C: Update Tree Protection Ordinance.** The County shall update existing Tree Protection Regulations in the Non-Coastal Zoning Ordinance to further enhance conservation of our urban forests and the preservation of the County’s oak woodland resources. Updates shall include incorporation of Board-adopted recommendations from the Ventura County Oak Woodlands Management Plan (2007), which include tree replacement offsets for ministerial development projects that remove protected trees, revisiting mitigation ratios for tree removal and oak woodland impacts for discretionary development projects. The update shall also evaluate existing protections for invasive, non-native trees and consider the degree to which they provide habitat for a species during critical life stages (e.g., colonial roost sites, breeding sites, etc.). In addition, the evaluation shall also include anticipated effects of climate change on the urban forest environment *[Source: New Program]*
- ▶ **Program D: Research Feasibility of Updating Vegetation Maps.** In partnership with other natural resource agencies and organizations, the County shall explore the feasibility of updating vegetation maps for unincorporated areas to facilitate the accurate analysis of potential impacts of development on vegetation communities and other sensitive biological resources. If necessary, the County shall develop or modify regulations and development standards to ensure adequate protections for vegetation communities. *[Source: New Program]*
- ▶ **Program E: Update Non-Coastal Zoning Ordinance Standards for Vegetation Communities.** Based on the results of Implementation Program COS-D, (updated vegetation mapping), the County shall develop or modify regulations and development standards to ensure adequate protections for vegetation mapping, if necessary.
- ▶ **Program F: Evaluate Increase to Standard Setback from Wetland.** The County shall evaluate whether a standard 200-foot setback from wetlands should apply to development in order to improve water quality, reduce the impacts of flooding and provide adequate protection for sensitive biological resources *[Source: New Program]*
- ▶ **Program G: Identification of Critical Habitats.** The County shall continue to partner with state and federal agencies to identify those areas of the County that are considered to be critical habitats of endangered, threatened or rare species as well as for other significant biological resources. *[Source: Existing GPP Program 1.5.3.1, modified]*
- ▶ **Program H: County Tree Planting Program.** The County shall plant at least one thousand trees annually on County property. *[Source: New Program]*

Coastal Area Plan Policies

▶ **Section 30240 Environmentally Sensitive Habitat Areas, Adjacent Developments:**

- ESHA shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas.
- Development in areas adjacent to ESHA and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade those areas, and shall be compatible with the continuance of those habitat and recreation areas.

Oak Park Area Plan

- ▶ **Policy 1.3.2.2:** Discretionary development shall be located to avoid the loss or damage to healthy mature trees and sensitive plant species, including: Catalina Mariposa Lily, Wind Poppy and Santa Susana Tar Plant and other rare or endangered species.
- ▶ **Policy 1.3.2.3:** Where applicable, developers shall be required to submit an updated Oak Tree Report, covering all oaks located within 50 feet of any proposed grading or construction. Trees, along with identifying number, health and aesthetic grades, shall be shown on the grading plan.
- ▶ **Policy 1.3.2.4:** All discretionary development shall comply with the oak tree preservation and mitigation requirements of the adopted Oak Park Development Plans.

Ojai Valley Area Plan

- ▶ **Policy 1.4.2.7:** Discretionary development which would result in a significant adverse impact to a Locally Important Plant Community shall be required to replace such Locally Important Plant Community proposed for removal on at least a 1:1 basis and will be required to monitor the success of such planting for a minimum of seven years. In lieu of replacement, developers may dedicate without compensation, acreage containing such Locally Important Plant Community to a government agency or non-profit organization (e.g., a homeowners' association, a land conservancy) provided such entity will provide assurances that the dedicated Locally Important Plant Community acreage will be retained in a permanent undeveloped state. Such dedicated lands shall be at least two times the acreage of the Locally Important Plant Community which is proposed for removal. The form of such dedication may be fee title, conservation easement or other instrument approved by the County.

Lake Sherwood/Hidden Valley Area Plan

- ▶ **Policy 2.1.2.8:** No blasting shall be permitted from February 15 through June 30 unless a field survey determines that there are no nesting raptors (other than kestrels) within 1/2 mile of the blasting site or unless studies are conducted to the satisfaction of Ventura County which indicate that blasting in an area will have no significant impact on nesting raptors.
- ▶ **Policy 2.1.2.9:** A field survey by a qualified biologist shall be done prior to destruction or modification of any rocky outcrops. Mitigation measures recommended by the survey shall be implemented.

ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact 4.4-1: Disturb or Result in Loss of Special-Status Species and Habitat

For the purposes of this analysis, special-status plant and wildlife species include those designations described in Section 8.2, “Biological Resources,” of the Background Report (Appendix B). As described in the Background Report and amended in Tables 4.4-1 and 4.4-2 in “Environmental Setting,” above, 153 special-status plant species and 100 special-status wildlife species are known or have potential to occur within the county. Fifty-nine of these species (35 wildlife species and 24 plant species) are listed under the ESA or CESA or as Fully Protected under California Fish and Game Code. In addition to those species, CEQA requires analysis of Ventura County’s list of Locally Important Plant and Animal species, which, as of 2017, includes 286 plant species and 13 wildlife species and are included in the Background Report (Appendix B). Special-status species in the county are commonly associated with sensitive habitats, such as riparian habitats, wetlands, dunes, coastal sage scrub, chaparral, and woodlands.

The land use diagram of the 2040 General Plan would accommodate future development of relatively higher intensity residential, commercial, mixed use, and industrial land uses within the Existing Community area designation (boundary) and the Urban area designation (boundary). These are areas with existing residential, commercial, and/or industrial uses developed with urban building intensities generally located adjacent to the boundaries of incorporated cities or along highway corridors such as SR 33, SR 118, SR 126, and Highway 101. The residential, commercial, mixed use, and industrial land use designations of the 2040 General Plan would apply to approximately 1.2 percent of land in the unincorporated county. Potential uses within these designations include small- and large-lot detached single-family homes, one- to three-story attached single-family dwellings and lower density multifamily developments, mixes of commercial, office, residential, civic, and/or recreational uses, one- to two-story structures for retail and commercial services, and industrial employment-generating uses, such as production, assembly, warehousing, and distribution.

The Rural land use designation would allow for low-density and low-intensity land uses such as residential uses and other rural uses which are maintained in conjunction with agricultural and horticultural uses or in conjunction with the keeping of farm animals for recreational purposes, such as greenhouses, principal and accessory structures related to agriculture, and also oil and gas wells, and would apply to approximately 0.9 percent of land in the unincorporated county.

Approximately 97.1 percent of the unincorporated county would remain designated as either Open Space (approximately 88 percent) or Agriculture (approximately 9 percent) under the 2040 General Plan. The Open Space land use designation would allow low intensity development with a minimum parcel size of 10 acres and 1 dwelling unit per parcel. Other uses could include composting operations, greenhouses, correctional institutions, mineral resource development, fire stations, and oil and gas wells. The Agriculture land use designation would allow for development of one dwelling unit per parcel and a minimum parcel size of 40 acres. Other uses could include greenhouses, principal and accessory structures related to agriculture, and composting operations. Proposed policies of the 2040 General Plan addressing flaring and trucking associated with new discretionary oil and gas wells could result in the construction and operation of new pipelines for the conveyance of oil, gas, or produced water.

Because of the programmatic nature of the 2040 General Plan, a precise, project-level analysis of the specific effects of future development on special-status species is not possible at this time. Thus, this analysis is maintained at a program level.

The Existing Community area designation (boundary) and the Urban area designation (boundary) generally contain less natural habitat, more features associated with urban development (e.g., paved roads, parking lots, buildings, impervious surfaces), and a greater level of disturbance (e.g., anthropogenic light sources, traffic noise, human activity) relative to less developed areas of the county that generally consist of open space, agricultural, and rural land uses. Developed areas may contain some habitat for special-status species, but to a lesser extent of a lesser quality than undeveloped areas; thus, concentrating higher intensity development within and adjacent to these areas would minimize or avoid potential disturbance or loss of special-status species. However, these areas may contain some natural habitats or developed habitats that support special-status species. Additionally, the types of future development that could occur within the Rural, Open Space, and Agricultural land use designations could be located within or adjacent to areas that include special-status species or habitat.

Future development under the 2040 General Plan that could occur in the vicinity of rivers, creeks, and drainages (e.g., Santa Clara River, Ventura River, and tributaries) may be within suitable habitat for species such as California red-legged frog (*Rana draytonii*), foothill yellow-legged frog (*Rana boylei*), western pond turtle (*Actinemys marmorata*), and southern California DPS steelhead (*Oncorhynchus mykiss irideus*). Future development under the 2040 General Plan that could occur in upland habitats could also result in disturbance or loss of special-status species that may occupy those habitats. Additionally, some special-status species known to occur in the county are located within existing developed areas, including but not limited to burrowing owl (*Athene cunicularia*) and nesting birds protected by the California Fish and Game Code and the federal MBTA. Disturbance or loss of special-status species and their habitats could result in reductions in local population size, habitat fragmentation, or reduced reproductive success.

Potential direct impacts on special-status species include injury or mortality that may occur as a result of future development under the 2040 General Plan. Direct impacts also include habitat modification and loss that results in the mortality or otherwise alters the foraging and breeding behavior substantially enough to cause injury. Indirect impacts could be caused by the spread of invasive non-native species that outcompete native species or alter habitat towards a State that is unsuitable for native species.

Habitat for special-status plant and wildlife species may be directly affected (e.g., habitat removal, vegetation removal) or indirectly affected (e.g., habitat fragmentation, increased level of noise or lighting, introduction of invasive, nonnative species), as a result of future development under the 2040 General Plan. Future development under the 2040 General Plan that could result in impacts on biological resources would require project-specific environmental review under CEQA. Species listed as threatened or endangered under the ESA or CESA, or fully protected under California Fish and Game Code, would be protected by existing State and federal laws that address potential impacts through site-specific environmental review and permitting. The County requires evaluation of discretionary projects that could affect biological resources (i.e., sites with natural vegetation; trees; or in proximity to a waterway, drainage, or wetland) under the initial study biological assessment requirements and this evaluation would include site-specific surveys to detect the potential for special-status

species. Environmental review and permitting for these species require development and implementation of project-specific conservation measures to minimize or avoid impacts through the design process and compensatory or other mitigation for any adverse effects on these species as a condition of project approval. Specifically, USFWS, CDFW, and the California Coastal Commission would not permit a project that would degrade habitat or result in loss of State or federally listed species without compensatory mitigation to fully mitigate for the loss.

For other special-status species that have less formal regulatory protection (e.g., CDFW species of special concern, rare plants not protected by CESA or ESA, Locally Important Species), project-level planning and environmental analysis for CEQA review would identify potentially significant impacts, based on the type and location of the project. Impacts to special-status species not protected under CESA or ESA would be considered significant under CEQA, and would be minimized or avoided through the design process (e.g., conducting surveys and modifying the project to avoid special-status species) and through implementation of mitigation for any significant impacts as a condition of project approval (e.g., implementing no-disturbance buffers, limited operating periods for construction and operations, or compensatory habitat enhancement or restoration). As a result, the potential disturbance or loss of special-status species not formally protected by State and federal laws is expected to be limited using standard measures regularly implemented at the project level for these species. Project-specific mitigation measures would be developed consistent with applicable State and federal requirements to reduce impacts to special-status species to less than significant under CEQA. For species for which standard, established mitigation guidance exists (e.g., established by CDFW), developed mitigation measures would follow these standards or provide a similar level of protection. In the absence of previously published guidance, mitigation would be developed in consultation with the appropriate agencies (e.g., CDFW).

In addition to existing State and federal laws and permitting requirements, the 2040 General Plan includes several policies and implementation programs that would further reduce potential direct and indirect impacts on special-status species, including those listed under CESA and ESA and those with less formal regulatory protection, and habitats and require project-level environmental review and mitigation for significant impacts. For example, Policies COS-1.1, COS-1.2, COS-1.3, COS-1.4, COS-1.5, COS-1.6, COS-1.7, COS-1.8, COS-1.9, COS-1.10, COS-1.11, COS-1.12, COS-1.13, COS-1.14, and COS-1.15 address sensitive biological resources, resident and migratory wildlife corridors, habitat connectivity, habitat conservation, wetland setbacks, and consultation with natural resources agencies. For instance, any discretionary development with potential to adversely affect biological resources would require evaluation by a biologist, and if impacts could occur as a result of development, mitigation measures would be developed to account for the impact (Policy COS-1.1). When feasible, mitigation measures should adhere to the following priority: avoid impacts, minimize impacts, and compensate for impacts. Additionally, development activities would be required to accommodate wildlife passage, minimize vegetation removal, and avoid riparian and wetland habitat (Policies COS-1.3, COS-1.4, and COS-1.5). Policies COS-2.2, COS-2.4, COS-2.8, COS-2.9, COS-2.10, and COS-2.11 address habitat conservation and protection of fisheries and marine resources within the Coastal Zone specifically, including requirements to replace dune vegetation that is adversely affected due to development activities. Policy COS-9.3 addresses preservation of open space lands for habitat protection and wildlife movement.

Development within the county would also be guided by nine Area Plans, which include additional policies designed to minimize the disturbance or loss of habitats and species, including policies that are specific to resources within each Area Plan (e.g., the Santa Clara River, special-status plants, oak trees) or policies with specific requirements in addition to 2040 General Plan policies (e.g., requirements for biological field reconnaissance reports). For example, the Ojai Valley Area Plan includes policies to protect locally important plant communities and outlines mitigation (e.g., replacement, dedication of conservation easements) to compensate for impacts to these communities in excess of the 2040 General Plan policies. The Oak Park Area Plan includes a policy that requires protection of sensitive plant species that are not identified in the Background Report and may not be considered locally significant outside of the Oak Park area. The Lake Sherwood/Hidden Valley Area Plan includes a policy to prevent impacts to nesting raptors and to rocky outcrop habitat that is more specific than 2040 General Plan policies.

Future development under the 2040 General Plan may result in direct or indirect impacts on special-status plant species, wildlife species, or habitat. Compliance with State law, federal law, and 2040 General Plan policies and implementation programs would reduce potential impacts of future development under the 2040 General Plan and require project-level environmental review under CEQA to evaluate potential impacts on biological resources and mitigate significant impacts on special-status plant and wildlife species. While these laws, policies, and implementation programs would substantially lessen the likelihood of adverse effects on special-status species, there would still be potential for direct or indirect impacts because presence of special-status species may only be determined through focused or protocol-level surveys, specific avoidance measures to prevent disturbance or direct loss of these species would be required, and specific compensation requirements would be necessary if impacts cannot be avoided. The 2040 General Plan does not include policies that specifically address reconnaissance and protocol-level surveys for special-status species, specific avoidance or minimization measures, or compensation requirements. Therefore, future development under the 2040 General Plan could result in adverse effects to special-status species. This impact would be **potentially significant**.

Mitigation Measures

Mitigation Measure BIO-1: New Implementation Program COS-X: Protection of Sensitive Biological Resources

The County shall include the following new implementation program in the 2040 General Plan.

Implementation Program COS-X: Protection of Sensitive Biological Resources

The County shall update the Initial Study Assessment Guidelines, Biological Resources Assessment report criteria to evaluate discretionary development that could potentially impact sensitive biological resources with the following:

- ▶ The qualified biologist shall conduct an initial data review to determine the sensitive biological resources (i.e., special-status plant, special-status wildlife, sensitive habitats [e.g., riparian habitat, sensitive plant communities, ESHA, coastal beaches, sand dunes, other sensitive natural communities], wetlands and other non-wetland waters, native wildlife nursery sites, or wildlife corridors) that have the potential to occur within the project footprint. This will include but not be limited to review of the best available, current data including vegetation mapping data, mapping data from the

County and California Coastal Commission, and database searches of the CNDDDB and the CNPS Inventory of Rare and Endangered Plants of California.

- ▶ The qualified biologist shall conduct a reconnaissance-level survey for sensitive biological resources within the project footprint (including proposed access roads, proposed staging areas, and the immediate vicinity surrounding the project footprint) to determine whether sensitive biological resources identified during the initial data review have potential to occur.
- ▶ If the reconnaissance-level survey identifies no potential for sensitive biological resources to occur, the applicant will not be subject to additional mitigation measures.
- ▶ If sensitive biological resources are observed or determined to have potential to occur within or adjacent to the project footprint during the reconnaissance-level survey, then the following measures shall apply:

Special-Status Species

- If special-status species are observed or determined to have potential to occur within or adjacent to the project footprint, a qualified biologist shall conduct focused or protocol-level surveys for these species where established, current protocols are available (e.g., Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities [CDFW 2018], Staff Report on Burrowing Owl Mitigation [CDFG 2012]). If an established protocol is not available for a special-status species, then the qualified biologist will consult with the County, and CDFW or USFWS, to determine the appropriate survey protocol.
- If special-status species are identified during protocol-level surveys, then the County shall require implementation of mitigation measures that fully account for the adversely affected resource. When feasible, mitigation measures should adhere to the following priority: avoid impacts, minimize impacts, and compensate for impacts.
- If impacts on special-status species are unavoidable, then the project proponent shall obtain incidental take authorization from USFWS or CDFW (e.g., for species listed under ESA or CESA) prior to commencing development of the project site, apply minimization measures or other conditions required under incidental take authorization, and shall compensate for impacts to special-status species by acquiring or protecting land that provides habitat function for affected species that is at least equivalent to the habitat function removed or degraded as a result of project implementation; generally at least a 1:1 ratio. Compensation may include purchasing credits from a USFWS- or CDFW-approved mitigation bank or restoring or enhancing habitat within the project site or outside of the project site.

Sensitive Habitats, Wetlands, Other Non-wetland Waters, Native Wildlife Nursery Sites, and Wildlife Corridors

- If sensitive habitats, wetlands, other non-wetland waters, native wildlife nursery sites, and wildlife corridors are identified within or adjacent to the project footprint, these features shall be avoided, if feasible, by implementing no-

disturbance buffers around sensitive habitats, wetlands, other non-wetland waters, or native wildlife nursery sites, and avoiding development within wildlife corridors or implementing project-specific design features (e.g., wildlife-friendly fencing and lighting) within wildlife corridors, such that direct and indirect adverse effects of project development are avoided.

- A delineation of aquatic habitat within a project site (including waters of the United States and other waters including those under State jurisdiction) including identification of hydrology, hydric soils, and hydrophytic vegetation, by a qualified biologist may be required to identify the exact extent of wetlands or other water features identified within or adjacent to the project footprint.
- If impacts to sensitive habitats, wetlands, other non-wetland waters, native wildlife nursery sites, and wildlife corridors cannot be avoided, then the project proponent shall obtain required regulatory authorization (e.g., Section 404 permits for impacts to waters of the United States, 401 water quality certification from the Regional Water Quality Control Board, a Streambed Alteration Agreement for impacts to aquatic or riparian habitats within CDFW jurisdiction under Fish and Game Code Section 1602, a coastal development permit for impacts to ESHA), and shall compensate for unavoidable losses of these resources. Compensation may include restoration of sensitive habitats, wetlands, other non-wetland waters, native wildlife nursery sites, and wildlife corridors within or outside of the project site, preserving the aforementioned resources through a conservation easement at a sufficient ratio to offset the loss of acreage and habitat function, or purchasing credits at an existing authorized mitigation bank or in lieu fee program. The County shall require restoration or compensation for loss of sensitive habitats, wetlands, other non-wetland waters, native wildlife nursery sites, and wildlife corridors at a minimum of a 1:1 ratio or “no-net-loss.”

Significance after Mitigation

With implementation of Mitigation Measure BIO-1 impacts on special-status species and habitat would be substantially lessened because it would require identification the species and habitats during reconnaissance-level and protocol-level surveys, avoidance of these species and habitats as feasible and as required by State and federal law, or incidental take coverage for State-and federally-listed species. As a result, this mitigation measure would routinely reduce project-level impacts to less than significant. However, due to the wide variety of future project types, site conditions, and other circumstances associated with future development, it is possible that there may be project-specific instances in which this mitigation measure would not reduce impacts to a less than significant level. Therefore, this impact would be **significant and unavoidable**.

Impact 4.4-2: Disturb or Result in Loss of Riparian Habitat, Sensitive Plant Communities, ESHA, Coastal Beaches, Sand Dunes, and Other Sensitive Natural Communities

Because of the programmatic nature of the 2040 General Plan, a precise, project-level analysis of the specific impacts of individual development projects under the 2040 General Plan on riparian habitat, sensitive plant communities, ESHA, coastal beaches, sand dunes, or other sensitive natural communities identified in local or regional plans, policies, or regulations, or by CDFW or USFWS (Table 4.4-3) is not possible at this time. Thus, this analysis is maintained at a program level.

Future development that could occur under the land use diagram of the 2040 General Plan is summarized in Impact 4.4-1. The Existing Community area designation (boundary) and the Urban area designation (boundary) generally contain less natural habitat, more features associated with urban development (e.g., paved roads, parking lots, buildings, impervious surfaces), and a greater level of disturbance (e.g., anthropogenic light sources, traffic noise, human activity) relative to less developed areas of the county that generally consist of open space, agricultural, and rural land uses. Developed areas may contain sensitive habitat, but to a lesser extent than undeveloped areas; thus, concentrating higher intensity development within and adjacent to these areas would minimize or avoid potential disturbance or loss of sensitive habitat. However, these areas may contain some sensitive habitat. Additionally, the types of future development that could occur within the Rural, Open Space, and Agricultural land use designations could be located within or adjacent to areas that include sensitive habitat.

Future development under the 2040 General Plan within or adjacent to sensitive habitats may occur and could result in direct or indirect adverse effects on these habitats. Direct impacts on riparian habitat, sensitive plant communities, ESHA, and other sensitive natural communities include temporary or permanent removal or disturbance to these habitats during construction or other activities, potentially adversely affecting the function or degrading the health of the habitat. Impacts on coastal beaches and sand dunes include any activity that causes direct or indirect adverse physical change to these features which is inconsistent with any of the coastal beaches and coastal sand dunes policies of the California Coastal Act, corresponding Coastal Act regulations, or other regulations, plans, and policies. Indirect impacts on sensitive habitats include habitat degradation caused by introduction or spread of invasive plant species or from erosion and sedimentation as a result of construction activities.

Under the 2040 General Plan, each discretionary project that could result in impacts on biological resources would require project-specific environmental review. Impacts on riparian habitat and ESHA would be reduced or avoided through existing State laws which address potential impacts through site-specific environmental review and permitting (e.g., California Fish and Game Code, California Coastal Act) as well as requirements for measures to reduce impacts to sensitive habitats and wildlife that use these habitats. These State laws are described in more detail in the “Regulatory Setting” section of the Background Report (Appendix B). Environmental review and permitting require development and implementation of project-specific conservation measures to minimize or avoid impacts through the design process and compensatory or other mitigation for any adverse effects on these resources as a condition of project approval. Specifically, CDFW or the California Coastal Commission would not permit a project that would degrade these habitats without compensatory mitigation to fully mitigate for the significant impact.

In addition to existing State laws and permitting requirements, the Ventura County Habitat Connectivity and Wildlife Corridor Ordinance contains regulations for development within surface water features (i.e., an area containing a stream, creek, river, wetland, seep, or pond; the riparian habitat associated with the feature; a development buffer of 200 feet as measured from the farthest extent of the features and associated riparian habitat). The 2040 General Plan also includes several policies and implementation programs that would further reduce potential impacts on riparian habitat, and ESHA, and would provide protection for sensitive habitats not otherwise protected by State law, including sensitive plant communities and other sensitive natural communities (Table 4.4-3).

Policies and implementation programs under the 2040 General Plan would require project-level environmental review for discretionary projects (i.e., identification of sensitive habitats within a project site) and mitigation for significant impacts. For example, Policies COS-1.1, COS-1.2, COS-1.7, COS-1.8, COS-1.9, COS-1.10, and COS-1.11 address sensitive biological resources, habitat conservation, wetland setbacks, and consultation with natural resources agencies. For example, these policies require identification, avoidance, and mitigation for impacts on sensitive biological resources for all discretionary development projects, avoidance of riparian habitat during bridge crossing projects, and evaluation of all discretionary development projects within 300 feet of wetland habitat to assess impacts. Policies COS-2.1, COS-2.2, COS-2.4, COS-2.5, COS-2.8, COS-2.9, COS-2.10, COS-2.11 address habitat conservation, beach erosion, shore protection, and protection of fisheries and marine resources within coastal zones.

Development within the county will also be guided by nine existing Area Plans, which include additional policies designed to minimize the disturbance or loss of sensitive habitats. Future development within the Coastal Zone would be guided by the Coastal Area Plan, which includes additional policies that would further reduce impacts on ESHA, coastal beaches, and sand dunes specifically, within the plan area of the 2040 General Plan. For example, these policies include requirements that development within ESHA be sited and designed to prevent impacts which would significantly degrade those areas. These measures are intended to reduce impacts on sensitive habitats within ESHA (e.g., tidepools, rocky substrate, riparian habitat, coastal dunes, wetlands), as well as wildlife (special-status and common wildlife), sensitive plants, and native vegetation, and would specifically do so by identifying requirements for development activities. Policies in the Coastal Area Plan also include measures to protect upland habitats in the Santa Monica Mountains, as adverse effects in these habitats may result in downstream impacts.

Future development under the 2040 General Plan may result in potential loss or degradation of riparian habitat, sensitive plant communities, ESHA, and other sensitive natural communities. Compliance with State law, 2040 General Plan policies and implementation programs, and the Coastal Area Plan would substantially lessen potential impacts of future development under the 2040 General Plan and require project-level environmental review under CEQA to evaluate potential impacts on biological resources and mitigate significant impacts on these habitats. While these laws, policies, and implementation programs would substantially lessen the likelihood of adverse effects on sensitive habitats, there would still be potential for disturbance or loss of sensitive habitat because presence of sensitive habitats may only be determined through focused surveys specific avoidance measures to prevent disturbance or direct loss of these habitats would be required, and specific compensation requirements would be necessary if impacts cannot be avoided. The 2040 General Plan does not include policies that specifically guide focused surveys for sensitive habitat, specific avoidance measures, or compensation requirements. Therefore, the potential loss or degradation of riparian habitat, sensitive plant communities, ESHA, and other sensitive natural communities as a result of implementing the 2040 General Plan would be **potentially significant**.

Mitigation Measures

Mitigation Measure BIO-1: New Implementation Program COS-X: Protection of Sensitive Biological Resources

Significance after Mitigation

Implementation of Mitigation Measure BIO-1 would substantially lessen significant impacts on sensitive habitats because it would require identification of these resources during reconnaissance-level or focused surveys, avoidance of these features as feasible and as required by State and federal law, or regulatory authorization as required by State and federal law. As a result, this mitigation measure would routinely reduce project-level impacts to less than significant. However, due to the wide variety of future project types, site conditions, and other circumstances associated with future development, it is possible that there may be instances in which this mitigation measure would not reduce impacts to a less than significant level. Therefore, this impact would be **significant and unavoidable**.

Impact 4.4-3: Disturb or Result in Loss of Wetlands and Other Waters

Due to the programmatic nature of the 2040 General Plan, the location, extent, and severity of potential disturbances to wetlands is not known at this time; however, examples of potential impacts include, but are not limited to, development in the vicinity of waterways including the Santa Clara River, the Ventura River, the Brown Barranca, the Franklin Barranca, and tributaries to these rivers. Direct impacts on wetlands caused by future development under the 2040 General Plan could include direct conversion of wetland habitat or other non-wetland waters to other uses. Indirect impacts could include degradation of water quality from increased erosion and sedimentation.

Future development that could occur under the land use diagram of the 2040 General Plan is summarized in Impact 4.4-1. The Existing Community area designation (boundary) and the Urban area designation (boundary) generally contain less natural habitat, more features associated with urban development (e.g., paved roads, parking lots, buildings, impervious surfaces), and a greater level of disturbance (e.g., anthropogenic light sources, traffic noise, human activity) relative to less developed areas of the county that generally consist of open space, agricultural, and rural land uses. Developed areas may contain wetlands, but to a lesser extent than undeveloped areas; thus, concentrating higher intensity development within and adjacent to these areas would minimize or avoid potential disturbance or loss of wetlands. However, these areas may contain some wetlands. Additionally, the types of future development that could occur within the Rural, Open Space, and Agricultural land use designations could be located within or adjacent to areas that include wetlands.

Under the 2040 General Plan, each discretionary project that could result in impacts on biological resources would require project-specific environmental review. Impacts on State and federally protected wetlands would be reduced through existing federal and State laws which address potential impacts through site-specific environmental review and permitting (e.g., Clean Water Act Section 404, California Fish and Game Code, California Coastal Act). These federal and State laws are described in more detail in the “Regulatory Setting” section of the Background Report (Appendix B). Environmental review and permitting require development and implementation of project-specific conservation measures to minimize or avoid impacts through the design process and compensatory or other mitigation for any adverse effects on these resources as a condition of project approval. Specifically, U.S. Army Corps of Engineers, CDFW, or the California Coastal Commission would not permit a project that would degrade wetland habitat without compensatory mitigation to fully mitigate for the significant impact.

In addition to existing federal and State laws and permitting processes, the Ventura County Habitat Connectivity and Wildlife Corridor Ordinance contains regulations for development within surface water features (i.e., an area containing a stream, creek, river, wetland, seep, or pond; the riparian habitat associated with the feature; a development buffer of 200 feet as measured from the farthest extent of the features and associated riparian habitat). The 2040 General Plan includes several policies and implementation programs that would further reduce potential impacts on State and federally protected wetlands and require project-level environmental review and mitigation for significant impacts (see “General Plan Update Policies and Implementation Programs,” above). For example, Policies COS-1.1, COS-1.2, COS-1.7, COS-1.8, and COS-1.9, COS-1.10, and COS-1.11 address sensitive biological resources, habitat conservation (including streams and wetlands), and consultation with natural resources agencies. For example, Policies COS-1.10 and COS-1.11 specifically address implementation of 100-foot (or larger) wetland setbacks and evaluation of all discretionary development within 300 feet of wetlands by a qualified biologist to determine whether impacts would occur. If significant impacts on a wetland habitat may occur, the discretionary project would be prohibited unless mitigation measures were approved that would reduce the impact to a less-than-significant level. Development within the county will also be guided by nine Area Plans; however, the policies of these Area Plans do not provide additional or more specific protection for wetlands and other waters than the 2040 General Plan policies.

Future development under the 2040 General Plan may result in potential loss or degradation of State or federally protected wetlands or waters. Because development would be encouraged in and around cities and unincorporated communities, impacts to wetlands may be minimized or avoided, as these areas typically do not contain high-quality natural habitat. However, some of these areas might contain wetlands, and some development may occur within or adjacent to open space areas that are more likely to contain wetlands. Compliance with State law, federal law, 2040 General Plan policies and implementation programs, and the Ventura County Coastal Area Plan would reduce potential impacts of future development under the 2040 General Plan and require project-level environmental review under CEQA to evaluate potential impacts on biological resources and mitigate significant impacts on wetland habitats.

While these laws, policies, and implementation programs would reduce the likelihood of adverse effects on wetlands, there would still be potential for impact because presence and extent of wetlands may only be determined through focused surveys, specific avoidance measures to prevent disturbance or direct loss of wetlands would be required, and specific compensation requirements would be necessary if impacts cannot be avoided. The Conservation and Open Space Element of the 2040 General Plan does not include policies that specifically outline wetland delineation requirements, specific avoidance measures, or compensation requirements. Therefore, potential loss or degradation of State or federally protected wetlands as a result of implementing the 2040 General Plan would be **potentially significant**.

Mitigation Measures

Mitigation Measure BIO-1: New Implementation Program COS-X: Protection of Sensitive Biological Resources

Significance after Mitigation

Implementation of Mitigation Measure BIO-1 would substantially lessen significant impacts on wetlands because it would require identification these features during reconnaissance-level surveys, a delineation of waters of the United States, avoidance of these features as feasible and as required by State and federal law, or regulatory authorization as required by State and federal law. As a result, this mitigation measure would routinely reduce project-level impacts to less than significant. However, due to the wide variety of future project types, site conditions, and other circumstances associated with future development, it is possible that there may be instances in which this mitigation measure would not reduce impacts to a less than significant level. Therefore, this impact would be **significant and unavoidable**.

Impact 4.4-4: Interfere with Resident or Migratory Wildlife Corridors or Native Wildlife Nursery Sites

Due to the programmatic nature of the 2040 General Plan, the location, extent, and severity of potential disturbances to wildlife movement corridors or native wildlife nursery sites is not known at this time. However, several regional wildlife corridors have been identified in Ventura County as part of the South Coast Missing Linkages Project and are presented in more detail in the “Habitat Connectivity/Wildlife Corridors” section of the Background Report (Appendix B).

Future development that could occur under the land use diagram of the 2040 General Plan is summarized in Impact 4.4-1. The Existing Community area designation (boundary) and the Urban area designation (boundary) generally contain less natural habitat, more features associated with urban development (e.g., paved roads, parking lots, buildings, impervious surfaces), and a greater level of disturbance (e.g., anthropogenic light sources, traffic noise, human activity) relative to less developed areas of the county that generally consist of open space, agricultural, and rural land uses. Developed areas may provide habitat connectivity or contain native wildlife nursery sites, but to a lesser extent than undeveloped areas; thus, concentrating higher intensity development within and adjacent to these areas would minimize or avoid potential interference with wildlife movement and native wildlife nursery sites at a county-wide level. However, these areas may contain some corridors for wildlife movement or native wildlife nursery sites. While the regional wildlife corridors in the county are largely associated with natural habitat (e.g., Los Padres National Forest, rivers, riparian habitat), portions of these corridors are located within or near existing developed areas and could be adversely affected by future development within these areas (See Figure 8.6 in the Background Report [Appendix B]). Additionally, the types of future development that could occur within the Rural, Open Space, and Agricultural land use designations could be located within or adjacent to areas that include sensitive habitat.

Impacts on wildlife corridors or native wildlife nursery sites include removal of habitat resulting in habitat fragmentation and loss of habitat connectivity, prevention of species dispersal (including wildlife and plants), prevention of shifts in a species’ range in response to climate change, or loss of important nursery sites (e.g., deer fawning areas, heron rookeries, bat maternity roosts) or direct interference with wildlife movement corridors through construction of artificial barriers (e.g., fences, roads).

Under the 2040 General Plan, each discretionary project that could result in impacts on biological resources would require project-specific environmental review. Impacts on some sensitive habitats that could function as wildlife corridors or native wildlife nursery sites, including riparian habitats, ESHA, and wetlands, would be reduced through existing federal and State laws which address potential impacts through site-specific environmental review and permitting (e.g., Clean Water Act Section 404, California Fish and Game Code, California Coastal Act). These federal and State laws are described in more detail in the “Regulatory Setting” section of the Background Report (Appendix B). Environmental review and permitting require development and implementation of project-specific conservation measures to minimize or avoid impacts through the design process and compensatory or other mitigation for any adverse effects on these resources as a condition of project approval. Specifically, U.S. Army Corps of Engineers, CDFW, or the California Coastal Commission would not permit a project that would degrade riparian habitat, ESHA, or wetland habitat without compensatory mitigation to fully mitigate for the significant impact.

In addition to existing federal and State laws and permitting processes, the 2040 General Plan includes several policies and implementation programs that would further reduce potential impacts on wildlife corridors and native wildlife nursery sites and require project-level environmental review and mitigation for significant impacts (see “General Plan Update Policies and Implementation Programs,” above). For example, Policies COS-1.1 and COS-1.2 address the protection and consideration of sensitive biological resources, which include wildlife movement corridors and native wildlife nursery site. Because these features are typically considered sensitive biological resources, implementation of Policies COS-1.1 and COS 1.2 would require evaluation of these features during site-specific surveys as well as development of mitigation measures to avoid, minimize, or compensate for impacts. Policies COS-1.7, COS-1.8, COS-1.9, COS-1.10, and COS-1.11 include requirements to requirements for environmental review for projects within 300 feet of wetland habitat, implementation of 100-foot setbacks from wetland habitat, incorporation of protective design features to avoid impacts to riparian habitat, and requirements for consultation with natural resources agencies for guidance regarding avoidance and minimization of impacts to rare, threatened, or endangered species. These requirements would have an indirect benefit on wildlife movement corridors and native wildlife nursery sites as these features are frequently associated with sensitive biological habitats (e.g., wetlands, riparian corridors). Policies COS-2.2, COS-2.4, COS-2.8, COS-2.9, COS-2.10, COS-2.11 address habitat conservation and protection of fisheries and marine resources within the Coastal Zone. Policies COS-1.3, COS-1.4, and COS-1.5 specifically address impacts on wildlife movement. For instance, the County is required to consider impacts to wildlife movement as part of the discretionary project review process, and the design and maintenance of floodplain improvements including culverts and bridges must be reviewed by a qualified biologist to accommodate feasible wildlife passage measures. Policy COS-9.3 addresses preservation of open space lands for habitat protection and wildlife movement. Development within the county will also be guided by nine Area Plans; however, the policies of these Area Plans do not provide additional or more specific protection for resident or migratory wildlife corridors or native wildlife nursery sites than the 2040 General Plan policies.

The Ventura County Habitat Connectivity and Wildlife Corridor ordinances, which are described in more detail above in Section 4.4.1, “Background Report Setting Updates,” require environmental review and discretionary approval of: (1) certain new development, including the construction of certain structures and removal of native vegetation, that is proposed near natural waterbodies/riparian areas or important wildlife crossing structures (e.g., bridges, culverts), and (2) wildlife impermeable fencing that would enclose large areas.

Outdoor lighting is also subject to new regulations in the Habitat Connectivity Wildlife Corridors (HCWC) Overlay Zone. In order to encourage the compact siting of new development in the Critical Wildlife Passages Area (CWPA) overlay zone, which is a particularly sensitive wildlife movement area located within the larger HCWC Overlay Zone, certain proposed development projects would require environmental review and approval unless the development is sited near existing development. The HCWC and CWPA Overlay Zones incorporate regional wildlife corridors previously identified in Ventura County as part of the South Coast Missing Linkages Project which are presented in more detail in the “Habitat Connectivity/Wildlife Corridors” section of the Background Report (Appendix B).

Future development under the 2040 General Plan may result in potential interference with the movement of resident or migratory wildlife or native wildlife nursery sites. Because development would be encouraged in and around existing developed areas, impacts to wildlife movement corridors and native wildlife nursery sites would be minimized or avoided, as these areas typically do not contain high-quality natural habitat. However, some of these areas might contain wildlife movement corridors or native wildlife nursery sites and some development may occur within or adjacent to open space areas that are more likely to contain these features. Compliance with State law would require project-level environmental review under CEQA to evaluate potential impacts on biological resources and mitigation of significant impacts on wildlife movement corridors and native wildlife nursery sites. Federal law, 2040 General Plan policies and implementation programs, and the Ventura County Habitat Connectivity and Wildlife Corridor ordinances would further reduce potential impacts of future development under the 2040 General Plan on these features.

The 2040 General Plan policies and implementation programs and the Ventura County Habitat Connectivity and Wildlife Corridor ordinances in particular substantially reduce the potential for adverse impacts to wildlife movement corridors by establishing known HCWC and CWPA Overlay Zones and guiding development in these zones in order to help preserve functional connectivity for wildlife and vegetation and to minimize loss of vegetation and habitat fragmentation. In addition to protecting wildlife movements, these laws, policies, and implementation programs would also reduce the likelihood of adverse effects on native wildlife nursery sites. However, there would still be potential for adverse impacts because presence of wildlife corridors and native wildlife nursery sites can only be determined through focused surveys and specific avoidance measures to prevent disturbance or direct loss. The 2040 General Plan does not include policies that require specific avoidance or other protection measures for native wildlife nursery sites. However, because the exact location of future development is not known; because native wildlife nursery sites have not been mapped in the county; and because no law, policy, or the HCWC requires complete avoidance of mapped or unmapped wildlife corridors; impacts to these resources could still occur. Therefore, potential loss or degradation of wildlife movement corridors or disturbances to wildlife nursery sites as a result of implementing the 2040 General Plan would be **potentially significant**.

Mitigation Measures

Mitigation Measure BIO-1: New Implementation Program COS-X: Protection of Sensitive Biological Resources

Significance after Mitigation

Implementation of Mitigation Measure BIO-1 would substantially lessen significant impacts on wildlife corridors and native wildlife nursery sites because it would require identification these features during reconnaissance-level surveys, avoidance of these features as feasible and as required by State and federal law, or regulatory authorization as required by State and federal law. As a result, this mitigation measure would routinely reduce project-level impacts to less than significant. However, due to the wide variety of future project types, site conditions, and other circumstances associated with future development, it is possible that there may be instances in which this mitigation measure would not reduce impacts to a less than significant level. Therefore, this impact would be **significant and unavoidable**.

Impact 4.4-5: Conflict with Any Local Policies or Ordinances Protecting Biological Resources

The Ventura County Oak Woodland Management Plan includes the following goals to protect oak woodlands, as outlined in the “Regulatory Setting” section of Section 8.2, “Biological Resources,” of the Background Report (Appendix B):

- ▶ encouraging private landowners and conservation organizations to protect oak woodlands;
- ▶ ensuring consistent consideration of oak woodlands during discretionary permit review;
- ▶ considering appropriate amendments to Ventura County’s regulatory plans and ordinances, as funding permits; and
- ▶ supporting countywide biological data collection, analysis, and mapping.

The Ventura County Non-Coastal Zoning Ordinance and Coastal Zoning Ordinance Tree Protection Regulations identify protected trees and require permitting from the County’s Planning Division to remove such trees. Protected trees under the ordinance include all oaks and sycamores 9.5 inches in circumference or larger, and most 9.5-inch in circumference or larger native trees located in the Scenic Resource Protection Overlay Zone. In the Coastal Zone, protected trees include trees considered ESHA, native trees, historic trees, and heritage trees. In the Coastal Zone, permits are required to alter any tree, including non-native trees.

Future development that could occur under the land use diagram of the 2040 General Plan is summarized in Impact 4.4-1. The Existing Community area designation (boundary) and the Urban area designation (boundary) generally contain less natural habitat, more features associated with urban development (e.g., paved roads, parking lots, buildings, impervious surfaces), and a greater level of disturbance (e.g., anthropogenic light sources, traffic noise, human activity) relative to less developed areas of the county that generally consist of open space, agricultural, and rural land uses. Developed areas may contain oak woodlands, oak and sycamore trees, or other native trees, but to a lesser extent than undeveloped areas; thus, concentrating higher intensity development within and adjacent to these areas would minimize or avoid potential loss of oak woodlands, oak and sycamore trees, or other native trees protected by local policies or ordinances.

Several sensitive natural communities containing oak woodland habitat (e.g., valley oak woodland, southern coast live oak riparian forest, canyon live oak ravine forest), sycamore trees (e.g., southern sycamore alder riparian woodland), and other native tree species have been identified within the county (Table 4.4-3).

The 2040 General Plan includes policies and implementation programs that would reduce potential impacts on these sensitive natural habitats and require project-level environmental review and mitigation for significant impacts (see “General Plan Update Policies and Implementation Programs,” above). These policies include COS-1.1 and COS-1.2, which require identification, avoidance, and mitigation for impacts of sensitive habitats and other biological resources and subsequent avoidance, minimization, and compensation for impacts on these resources.

Because applicants for projects requiring discretionary approval would be required to abide by the restrictions in and implement mitigation based on the Ventura County Oak Woodland Management Plan and Tree Protection Regulations, future development under the 2040 General Plan is not expected to conflict with these plans and ordinances. The Aesthetics (Section 4.1), Hydrology and Water Quality (Section 4.10), and Noise and Vibration (Section 4.13) sections of the draft EIR include analysis of local ordinances concerning lighting, noise, and water quality that may have an indirect effect on biological resources. Therefore, impacts related to potential conflicts with local policies or ordinances protecting biological resources would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.