Historic Biological Reports
Scan Control Sheet

County Project Number(s): CUP-5234

Report Type (check one):
- ☒ Initial Study
- ☐ Species Inventory/Survey
- ☐ Focused Study
- ☐ EIR
- ☐ Draft EIR
- ☐ EIS
- ☐ ND
- ☐ MND
- ☐ Other

Report Date (Month/Day/Year): 03/15/2002

Check if the following apply to the report:

- ☒ Wetland and/or aquatic habitat
- ☐ Within designated Coastal Zone
- ☐ Potential movement corridor for fish and/or wildlife

California Environmental Quality Act Environmental Checklist Form
Biological Resources
County of Ventura, Planning Division
CUP-5234

DMEC

MAR 2 5 2002

CASE FILE NO.: CUP-5234 (DMEC PN 02-0041-1)	**PROJECT PLANNER:** Scott Ellison
DATE: 15 March 2002; field site visit conducted on 5 March 2002	**PROJECT BIOLOGIST(S):** David Magney and Cher Batchelor of David Magney Environmental Consulting

PROJECT LOCATION: The project site is located off the north side of Fairview Road, between (northeast of) Meiners Oaks and (northwest of) Ojai; NE½, NE¼, S3, T4N, R23W, Matilija Quadrangle (7.5 minute series), Ventura County, California; N 34°27.713" latitude, W 119°16.052" longitude. It is in the McDonald Creek watershed.

PROJECT ADDRESS: 455 Fairview Road, Ojai.

DESCRIPTION OF PROJECT: DMEC performed a full site review of the 21-acre parcel (Assessor's Parcel No. 10-170-02) for the proposed expansion of Camp Ramah with an education retreat (reading and conversation), including various sleeping facilities. An existing house with a 4-car carport would be converted to meeting areas, dorm rooms, and private bedrooms for 24 people. Access to the retreat would be from Camp Ramah, and the access road is proposed to cross McDonald Creek and lead to what is now the existing house. All meals and additional parking would occur at the camp. Proposed additional facilities include one handicapped parking space to be added to the existing carport, horse stalls, two hard-surface sports courts, a 330'x200' sports field, and an unspecified open area approximately 2/3 the size of the sports field. Four mature Coast Live Oak trees would be removed.

ENVIRONMENTAL SETTING: The project site is approximately ½ mile long, and is located approximately one mile northeast of Meiners Oaks, immediately west of Camp Ramah and McDonald Creek. The existing access road/driveway leading into the expansion site (and existing house) runs parallel to and crosses over McDonald Creek. A new access road (driveway) would be constructed from the west side of Camp Ramah, across McDonald Creek, west to the expanded carport on the east side of the existing house. The two hard-surface sports courts are proposed at approximately 200 feet northeast of the existing house, and the proposed horse stalls would be located approximately 150 feet north of the sports courts against a steep south-facing slope. The north edge of the sports field is proposed to be located in an existing citrus orchard approximately 270 feet south of the existing house, and the north edge of the proposed open area is to be located immediately adjacent to, and south of, the sports field (approximately 450 feet south of the existing house). See attached photographs for selected scenes of the project site.

The project site is located on a gentle to moderate south-facing slope. The northern portion of the project site, where the proposed courts and horse stalls are proposed, is inhabited primarily by California Annual Grassland, much of which is bordered by small stands of Coast Live Oak Woodland. A steep south-/southeast-facing slope begins immediately north of the existing house and west of the proposed courts/stalls. This steeper slope is predominated by Mixed Chaparral with some integration of a few riparian plant species from a drainage that empties into McDonald Creek. The southern portion of the project site extends approximately 600 feet from the south side of the existing house to

the southern extent of the proposed open area, which is primarily occupied by citrus orchards with little or no native vegetation. McDonald Creek, running parallel to the existing access road to the project site, is occupied by California Sycamore Riparian Woodland; however, this habitat is a significantly disturbed riparian corridor heavily influenced by nonnative and ornamental plant species[1].

California Annual Grassland. California Annual Grassland occupies much of the northern portion of the project site, southeast of the existing house and northeast where the sports courts and horse stalls are proposed. California Annual Grassland is dominated by a mixture of nonnative (naturalized) annual grasses, which are primarily Mediterranean in origin (genera including *Avena, Bromus, Hordeum, Lolium*, and *Vulpia*). This plant community occurs on all slope-aspects and on most geomorphic features (elevations below 1,200 meters), particularly where slopes are gradual and soils are deep. The major factors determining grassland composition and floristic richness include fall temperatures and precipitation, light intensity affected by shading from plants and litter, microtopography variations, and land use activity.

The predominant annual grass species found onsite include: *Avena barbata* (Slender Wild Oat), *Bromus diandrus* (Ripgut Brome), *Bromus hordeaceus* (Soft Chess), *Bromus madritensis* ssp. *rubens* (Red Brome), *Hordeum murinum* ssp. *leporinum* (Hare Barley), and *Vulpia bromoides* (Slender Fescue). *Piptatherum miliaceum* (Smilo Grass), a nonnative perennial grass, was also observed.

Several native annual and perennial herbs and scattered conspicuous wildflowers were also observed contributing to California Annual Grassland onsite, including: *Ambrosia psilostachya* var. *californica* (Western Ragweed), *Castilleja exserta* ssp. *exserta* (Purple Owl's Clover), *Chenopodium berlandieri* (Pitseed Goosefoot), *Chlorogalum pomeridianum* var. *pomeridianum* (Soap Plant), *Conyza canadensis* (Common Horseweed), *Eremocarpus setigerus* (Dove Weed), *Eucrypta chrysanthemifolia* var. *chrysanthemifolia* (Eucrypta), *Gnaphalium bicolor* (Bicolored Everlasting), *Gnaphalium californicum* (Green Everlasting), *Heterotheca grandiflora* (Telegraph Weed), *Lessingia filaginifolia* (Cudweed-aster), *Lotus purshianus* var. *purshianus* (Spanish Clover), *Lupinus nanus* (Sky Lupine), *Oenothera* cf. *californica* (California Evening-primrose), *Phacelia viscida* var. *albiflora* (White-flowered Viscid Phacelia [a locally rare species of Ventura County[2]]), *Plantago lanceolata* (Narrowleaf Plantain), *Sisyrinchium bellum* (Blue-eyed Grass), *Stachys bullata* (Pink Hedgenettle), *Trichostema lanceolatum* (Vinegar Weed [a locally rare species of Ventura County[3]]), and *Verbena lasiostachys* (Western Verbena).

The nonnative and often invasive or ruderal inhabitants scattered throughout the annual grassland onsite includes: *Anagallis arvensis* (Scarlet Pimpernel), *Carduus pycnocephalus* (Italian Thistle), *Centaurea melitensis* (Tocalote), *Chenopodium* spp. (four species of goosefeet), *Erodium* spp. (three species of filarees), *Hirschfeldia incana* (Summer Mustard), *Malva parviflora* (Cheeseweed), *Marrubium vulgare* (White Horehound), *Medicago polymorpha* (Bur-clover), *Picris echioides* (Prickly Ox-tongue), *Raphanus sativus* (Wild Radish) *Rumex crispus* (Curly Dock), *Silybum*

[1] Plant community descriptions are described according to Sawyer, J.O. and T. Keeler-Wolf. 1995. *A Manual of California Vegetation*. California Native Plant Society, Sacramento, California.

[2] Magney, D.L. 2001. Ventura County Rare Plants. Draft. California Native Plants Society, Channel Islands Chapter, Ventura, California. Posted on CNPS website: *http://www.cnps.org/rareplants/rppindex.htm*.

[3] Ibid.

marianum (Milk Thistle), *Sisymbrium irio* (London Rocket), and *Sonchus oleraceus* (Common Sow-thistle).

Coast Live Oak Woodland. Coast Live Oak Woodland is dominated by *Quercus agrifolia* var. *agrifolia*, which is an evergreen, wide-topped tree with weakly spine-toothed, convex, dark green leaves. *Q. agrifolia* is a widely distributed species of the evergreen oaks, and it is capable of achieving large size and old age. This oak typically occurs in valleys, on steep slopes, raised stream banks, or terraces as a pure stand or as an important contributor to a variety of other plant communities. Coast Live Oak Woodland forms a continuous to open 30-meter tall canopy, growing over an understory of occasional or common shrubs and an absent or herbaceous groundlayer, and requires sandstone or shale-derived soils of elevations below 1,200 meters.

The Coast Live Oak Woodland observed onsite forms a dense continuous canopy behind the existing house, and it borders, and is a transition between, California Annual Grassland (occupying the more gentle slopes) and Mixed Chaparral (occupying the steeper slopes). *Q. agrifolia* observed onsite include large, mature/old-growth oak trees with wide canopies and significant trunk girth. The oak trees contribute to the quality and function of wildlife habitat existing onsite, and provide important food, cover, shelter, and migration resources for many wildlife species. For example, a Dusky-footed Woodrat nest was observed below the dense bordering oak canopy on the western edge of the annual grassland and proposed sports courts location.

The understory herbaceous plant species observed occupying the groundlayer of Coast Live Oak Woodland onsite include many of the species observed making up the surrounding California Annual Grassland plant community. The native understory shrubs and perennial vines observed scattered below the oak tree canopy include the following species: *Baccharis pilularis* (Coyote Brush), *Ceanothus spinosus* (Greenbark Ceanothus), *Keckiella cordifolia* (Heart-leaved Penstemon), *Marah fabaceus* var. *agrestis* (California Wild Cucumber), *Marrubium vulgare*, *Prunus ilicifolia* (Hollyleaf Cherry), *Sambucus mexicana* (Blue Elderberry), and *Toxicodendron diversilobum* (Poison Oak).

Mixed Chaparral. Chaparral is predominated by a mixture of evergreen shrubs with small, thick, leathery leaves. The shrubs of chaparral are relatively tall and dense, and are adapted to periodic wildfires by stump sprouting or by germination from a dormant seed bank. These evergreen shrubs are also adapted to drought by deep extensive root systems, while their small thick leaf structure prevents permanent damage from moisture loss. Mixed Chaparral is a stand consisting of no dominant shrub species and also consists of many Coastal Sage Scrub species, which are generally drought-deciduous, low-growing, soft-leaved shrubs and subshrubs. These sage scrub species grow intermixed as important associates to the chaparral species. Mixed Chaparral typically occurs on moderate to steep south-facing slopes with dry, rocky, shallow soils, becoming more abundant with higher elevations where temperatures are lower and moisture supplies are more ample.

The Mixed Chaparral observed at the project site occupies much of the steep south-facing slope immediately north of the existing house and proposed construction sites. This plant community is not only influenced by Coastal Sage Scrub species, but is also influenced by a few riparian plant species, as a drainage comes from the northwest of the proposed horse stalls and "flows" southeast (directly into the proposed horse stalls location).

The predominant chaparral species contributing to the Mixed Chaparral plant community observed onsite include: *Adenostoma fasciculatum* (Chamise), *Ceanothus spinosus*, *Eriodictyon crassifolium* var. *nigrescens* (Yerba Santa), *Malacothamnus fasciculatus* var. *fasciculatus* (Chaparral Bushmallow), *Malosma laurina* (Laurelleaf Sumac), and *Prunus ilicifolia*. The important Coastal Sage Scrub species observed contributing to the Chaparral onsite include: *Artemisia californica* (California Sagebrush), *Baccharis pilularis*, *Calystegia macrostegia* (Morning-glory [perennial vine]), *Eriogonum fasciculatum* var. *polifolium* (California Wild Buckwheat), *Isocoma menziesii* var. *vernonioides* (Coastal Goldenbush), *Lotus scoparius* var. *scoparius* (Deerweed), *Marrubium vulgare*, *Nicotiana glauca* (Tree Tobacco [nonnative/invasive]), *Salvia mellifera* (Black Sage), and *Solanum xantii* (Chaparral Nightshade).

The intermixed riparian plant species include: *Arundo donax* (Giant Reed [a nonnative/invasive giant grass]), *Baccharis salicifolia* (Mulefat), and *Sambucus mexicana*. The sparse herbaceous layer consists of annual grasses, *Eriophyllum confertiflorum* var. *confertiflorum* (Golden Yarrow), *Gnaphalium californicum*, *Lessingia filaginifolia*, and *Nassella* cf. *pulchra* (Purple Needlegrass [a native perennial bunchgrass]).

California Sycamore Riparian Woodland. In addition to several nonnative and ornamental species, observed in the McDonald Creek area of the project site, the creek's corridor is dominated by large, mature *Platanus racemosa* var. *racemosa* (California Sycamore) trees forming California Sycamore Riparian Woodland. *P. racemosa* is a native, monoecious, wind-pollinated, broad-leaved, winter-deciduous tree with smooth, pale bark and large, densely hairy, palmately lobed leaves. It is common along streamsides or in canyons and is a facultative wetland species (FACW wetland indicator status[4]).

California Sycamore Riparian Woodland grows in seasonally flooded (permanently saturated at depth) wetland soils of freshwater riparian corridors, braided depositional channels of intermittent streams, springs, seeps, and riverbanks. This woodland type may also occur on more upland rocky canyon slopes, in alluvial, open-cobbly, and rocky soils, at elevations below 2,400 meters. A shrubby thicket of evergreen and deciduous shrubs are typically scattered below the 35-meter, widely spaced, sycamore canopy. In addition to the ornamentals species, *Baccharis salicifolia*, *Heteromeles arbutifolia* (Toyon), *Quercus agrifolia*, *Rubus ursimus* (California Wild Blackberry), *Salix lasiolepis* (Arroyo Willow), and *Sambucus mexicana* were observed making up much of the understory below the sycamore canopy.

Ornamental Species. Several nonnative ornamental plant species were observed onsite, as the house/yard area, the orchard, and portions of the creek were either landscaped at one point or several ornamentals escaped and are now inhabiting more natural areas of the project site. The ornamental species observed onsite include the following: *Citrus sinensis* (Orange), *Juniperus phitzeriana* (Phitzer Juniper), *Phoenix canariensis* (Canary Island Date Palm), *Olea europea* (Olive), *Prunus* sp. (plum?), *Rosa multiflora* hybrids (roses), *Rosmarinus officinalis* (Rosemary), *Schinus molle* (Peruvian Pepper Tree), *Vinca major* (Periwinkle), and *Washingtonia robusta* (Mexican Fan Palm).

Wildlife. Open California Annual Grassland, stratified Mixed Chaparral, and dense mature Coast Live Oak Woodland habitats, such as those observed at the project site, provide important habitat and

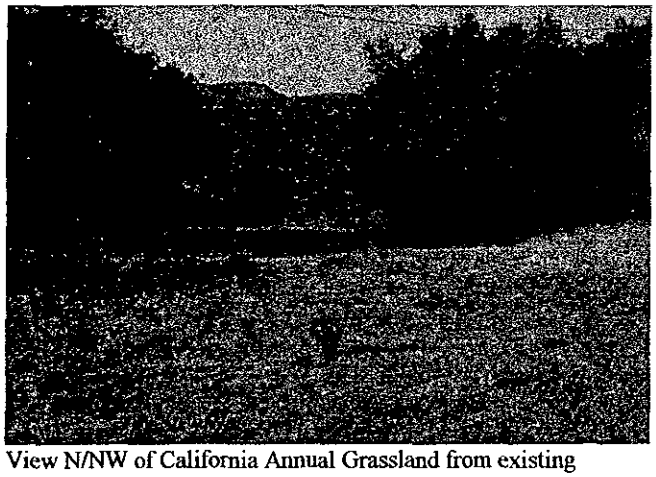
[4] Reed, P.B., Jr. 1988. *National List of Plant Species That Occur in Wetlands: California (Region 0).* (Biological Report 88[26.10].) U.S. Fish and Wildlife Service, Washington, DC.

resources for a wide variety of wildlife species, especially when adjacent to wetland areas, such as the drainage to the north and McDonald Creek to the east of the project site. In an undisturbed state, these habitats can support a high diversity of wildlife species, especially reptiles and birds, and are often required by several special-status wildlife species. The moderate wildlife species richness and diversity onsite indicates adequate habitat function, and the number and diversity of wildlife species observed during the site visit define the general site condition.

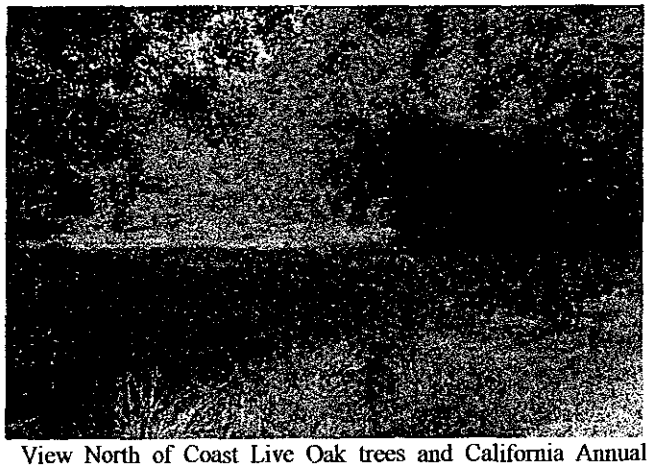
The project site is active with several wildlife species (observed either by direct observation or by sign) that frequent and inhabit the three primary habitats onsite, including: Botta's Pocket Gopher (grassland/chaparral), Dusky-footed Woodrat (nest below oak canopy), Mule Deer (prints in chaparral), Coyote (scat in chaparral), Western Skink (grassland), Western Fence Lizard (grassland/chaparral), Gopher Snake (chaparral), Acorn Woodpecker (oak canopy), California Quail (chaparral), Common Raven (sycamore canopy), Brown Towhee (chaparral), American Crow (flying over), Phainopepla (chaparral), Scrub Jay (chaparral), Snipe Fly, a moth, a grasshopper, a Blue Butterfly (unidentified), and several other unidentified songbirds.

Additional wildlife species are expected to use the parcel either regularly or occasionally, including Audubon Cottontail, California Jackrabbit, California Mole, Merriam's Kangaroo Rat, Deer Mouse, Bobcat, Mountain Lion, Black Bear, Raccoon, Virginia Opossum, San Diego Coast Horned Lizard, Side-blotched Lizard, Southern Alligator Lizard, Western Rattlesnake, Garter Snake, and Kingsnake. Raptors, such as Cooper's Hawk, Red-tailed Hawk, Great Horned Owl, and White-tailed Kite, and several species of bats, are also expected to forage onsite. One or more of the raptors may nest in the oak trees onsite.

Site Photographs:



View N/NW of California Annual Grassland from existing driveway. Four (4) Coast Live Oak trees would be removed.



View North of Coast Live Oak trees and California Annual Grassland towards proposed horse stalls site.

IV. BIOLOGICAL RESOURCES:	**PROJECT IMPACT DEGREE OF EFFECT[5]**				**CUMULATIVE IMPACT DEGREE OF EFFECT**			
What level of impact will the proposal have on:	**N**	**LS**	**PS-M**	**PS**	**N**	**LS**	**PS-M**	**PS**
A. Endangered, Threatened, or Rare Species			X				X	
B. Wetland Habitat			X				X	
C. Coastal Habitat	X				X			
D. Migration Corridors			X				X	
E. Locally Important Species/Communities			X				X	
Will the proposal:								
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?			X				X	
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?			X				X	
c) Have a substantial adverse effect on federally protected wetland as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?			X				X	
d) 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?			X				X	
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?			X				X	
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	X				X			

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

ADDITIONAL COMMENTS OR EXPLANATION:

IVa. Special-Status Plants. A literature review, and a search of the California Natural Diversity Database (CNDDB) RareFind2[6], identified at least 165 special-status species of vascular plants, which are known to occur in the vicinity of the project site in the Ojai and Matilija Quadrangles (U.S.G.S 7.5-Minute Series Maps) of the Ojai Valley. Based on DMEC's field survey and assessment of the project site conditions, knowledge of the region, searches of the CNDDB RareFind2, and literature reviews, DMEC determined that:

- No (0) federally listed nor state listed special-status species were observed or are expected onsite;
- Thirteen (13) species have a California Native Plant Society (CNPS) List and CNPS R-E-D designation[7];
- Five (5) species have a State- and Global-rank as special-status species;
- All 165 species are considered Species of Local Concern (plant species known as having less than ten (10) populations within Ventura County)[8]; and
- Two (2) Species of Local Concern were observed onsite.

Two (2) Plant Species of Local Concern were observed inhabiting the California Annual Grassland occupying the understory of the Coast Live Oak Woodland habitat onsite: *Phacelia viscida* var. *albiflora* (White-flowered Viscid Phacelia) and *Trichostema lanceolatum* (Vinegar Weed). White-flowered Viscid Phacelia is a native annual herb with white flowers, and only two (2) occurrences of this species are reported in Ventura County; the project site represents the second known occurrence. Vinegar Weed is also a native, strong-scented, annual herb with lavender flowers, and only four (4) occurrences of this species are reported in Ventura County.

IVa. Special-Status Wildlife. No special-status wildlife species were observed during the biological survey; however, the CNDDB search for the area indicates that three (3) special-status wildlife species are known to occur in the vicinity of the project site, including *Clemmys marmorata pallida* (Southwestern Pond Turtle), *Oncorhynchus mykiss irideus* (Southern Steelhead Trout), and *Rana aurora draytonii* (California Red-legged Frog). None of these special-status wildlife species are expected to inhabit or frequent the project site since suitable habitat, including that of McDonald Creek, is absent.

IVb. Sensitive Habitat Types. Wetland habitats are considered sensitive, as impacts resulting from human activities continue to encroach upon them, with a loss of over 90 percent of wetlands in California since 1850. The CNDDB RareFind2 searches identified four (4) special-status habitats, which are known to occur in the vicinity of the project site in the Ojai and Matilija Quadrangles (U.S.G.S 7.5-Minute Series Maps) of the Ojai Valley. The four special-status habitats include the following riparian plant communities: Southern California Steelhead Stream, Southern Coast Live Oak Riparian Forest, Southern Riparian Forest, and Southern Sycamore Alder Riparian Woodland.

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[6] Natural Diversity Database – RareFind2. 1999. California Department of Fish and Game, Natural Diversity Database, Sacramento, California.

[7] California Native Plants Society. 2001. *Inventory of Rare and Endangered Plants of California*. Sixth Edition. California Native Plant Society, Sacramento, California.

[8] Magney, D.L. 2001. See footnote 2.

Of these expected sensitive habitats, Southern Riparian Forest and Southern Sycamore Alder Riparian Woodland are represented onsite by the California Sycamore Riparian Woodland, which is predominant along McDonald Creek, as described above in Environmental Setting.

IVe. Tree Preservation. Impacts to botanical resources also include permanent and temporary loss of, or damage to, regulated tree species (under County ordinance), such as *Quercus agrifolia* var. *agrifolia* (Coast Live Oak). Four (4) mature Coast Live Oak trees are proposed to be removed from the project site in order to implement the Camp Ramah expansion facilities. The horse stalls, sports courts, and a handicapped parking space are all proposed to be constructed east and north of the existing house. These developments would cause adverse impacts to Coast Live Oak Woodland bordering the California Annual Grassland and Mixed Chaparral plant communities onsite. Although impacts to, or loss of, individual trees appear insignificant, such impacts contribute to the cumulative adverse affects of impacts to the total botanical resources of the Ojai Valley.

Even if no oak trees are removed, it is virtually impossible to avoid damage to some oak trees onsite, which would incur some degree of either injury or change in their environment; however, a reasonable goal is to keep impacts to a minimum extent possible, of which a tree can still tolerate. Impacts (such as root and canopy damage) also cumulatively affect the woodland as a whole, especially if damage to the oaks leads to permanent loss of one or more oak trees.

RECOMMENDATIONS:

This expansion project will result in significant impacts on biotic resources as currently proposed, including: removal of California Annual Grassland habitat; loss of at least two locally rare plant species; degradation of Coast Live Oak habitat including the removal of four mature Coast Live Oak trees; and filling of waters of the United States (the proposed access road will cross McDonald Creek). Although a portion of the property is developed in orchard and a residence, natural vegetation exist on portions of the site, further impacts and degradation to the natural habitats onsite should be minimized to the maximum extent possible, and can be avoided through locating some of the facilities elsewhere onsite.

IVa. Special-Status Species. The site survey was conducted in early spring (March), during which most annuals are typically in bloom, and the majority of the observed plant species were identifiable. However, several species were only producing new foliage at the time of the field survey, and only a fraction of the species observed were actually producing flowers due to this year's light and late rains. Therefore, additional seasonal field surveys for botanical resources may be required prior to changes in land use or grading in order to determine whether additional special-status plant species are present onsite. Any additional botanical surveys should be floristic in nature, should concentrate on potential special-status species, and should include vascular and nonvascular plants.

Two plant species of local concern were observed onsite, and impacts to these sensitive plant species should be avoided or minimized to the maximum extent practicable. Impacts to the two locally rare species, and contributing to the depletion of open California Annual Grassland in which they inhabit,

can be avoided all together by moving the proposed sports courts and horse stalls to the available land space (in the orchard) between the existing house and where the sports field is proposed.

No special-status wildlife species were observed onsite, and no impacts to special-status wildlife species are expected to result from expansion activities onsite.

IVb. Sensitive Habitat Types. The sensitive habitat present onsite is Sycamore Riparian Woodland. This habitat forms the riparian corridor along McDonald Creek, running north to south along the entire extent of the eastern side of the project site and along the access road to the property. Impacts to the Sycamore Riparian Woodland onsite will result from the following: (1) a less than 100-foot buffer between the creek and the proposed hose stalls and sports courts; (2) a proposed crossing of the creek from Camp Ramah into the newly expanded area, which will result in the filling of jurisdictional waters of the U.S. (IVc.); and (3) the horse stalls are proposed for construction in the immediate path of a drainage "flowing" from the northwest to the northeast, which would drain waste pollutants from the stalls into McDonald Creek.

At least a 100-foot buffer should be established between any wetland/riparian habitats and any development, including access roads, the sports courts, and horse stalls, in order to maintain the integrity and function of the sensitive riparian corridor and the wildlife habitat created by it. A 100-foot buffer should remain along the riparian zone to minimize impacts to sensitive wetlands. Impacts to the McDonald Creek corridor can be avoided by moving the proposed sports courts and horse stalls to the area (the orchard) between the existing house and where the sports field is proposed.

Permits from the appropriate agencies should be applied for and obtained in order to cross McDonald Creek for access to the expansion site. The applicant will need to obtain a Streambed Alteration Agreement from the California Department of Fish and Game for any and all modifications to McDonald Creek, including a bridge, pursuant to Section 1600 et seq. of the California Fish and Game Code. The applicant will also need to obtain a permit from the U.S. Army Corps of Engineers (Corps) Regulatory Branch to install the bridge across McDonald Creek. A general (nationwide) permit has already been issued for such activities; however, the applicant must follow all permit requirements. Proper mitigation measures should then be implemented in order to compensate for any impacts to the sensitive riparian habitat and to comply with conditions and regulations pursuant to the Clean Water Act of the Corps, and a Streambed Alteration Agreement of the California Department of Fish and Game. A wetland mitigation and monitoring plan will be required by these agencies, also pursuant to CEQA, to describe the specifications of onsite mitigation for impacts to wetland resources. DMEC recommends that mitigation for the bridge and driveway impacts include removal of all invasive exotic plant species from within McDonald Creek riparian habitat for the length of the creek on the project site. Where soil is disturbed for the bridge crossing, riparian plant species native to the creek be planted.

The horse stalls are proposed for construction in the immediate path of an unnamed drainage to McDonald Creek. Animal waste products and other pollutants will be periodically washed downstream into McDonald Creek during rain events. In addition, the horse stalls would also be

periodically flooded and possibly nonfunctional if built in the proposed location. Impacts to water quality of McDonald Creek and lower creek/river systems can be avoided by moving the proposed sports courts and horse stalls to the land space (the orchard) between the existing house and where the sports field is proposed and installing pollution runoff barriers.

Additional impacts to the sensitive habitats onsite will result from any vegetation clearing due to future development of the parcel, increased competition created by invasive exotic plant species if they are not eradicated, and fire hazard brush clearance requirements. The sensitive Sycamore Riparian Woodland habitat onsite is significantly invaded by many nonnative and ornamental plant species, and the invasive exotic species are expanding into adjacent native habitats as well. The species of most concern is *Vinca major* (Periwinkle), which is an invasive ornamental vine that dominates the groundlayer of riparian habitats, and inhibits the growth of natural native herbaceous species. Periwinkle and the other invasive exotic species of concern, which were observed onsite and that are listed above in Environmental Setting, need to be controlled, using appropriate methods of eradication and removal that do not harm biotic resources or native vegetation. These measures are important to reduce unnatural high competition levels for natural native plants and successional native plant communities that are required for maintaining wildlife habitat functions.

Fire hazard brush clearance requirements around proposed structures would increase the amount of natural vegetation removed. Brush clearance requirements may not necessarily remove sensitive habitat onsite; however, natural old-growth oak woodland, dense chaparral, and open grassland habitats would be cleared to some extent that provide required resources and support/maintain plant and wildlife species richness and diversity. This vegetation clearing would not only contribute to the loss of natural habitats onsite, but would also contribute to the cumulative loss of natural habitats in the region. All future grading and land use alterations, not currently requested, which may cause additional impacts to the biotic resources onsite, should be investigated and evaluated upon proposal.

IVc. Regulated Waters/Wetlands of the U.S. The proposed access road leading from Camp Ramah into the proposed expansion area will cross McDonald Creek. Such actions and construction activities typically require appropriate permits from the U.S. Army Corps of Engineers, Los Angeles Regional Water Quality Control Board, and California Department of Fish and Game, as these agencies each regulate activities within waters of the U.S. and/or state.

IVe. Tree Preservation. Four (4) mature Coast Live Oak trees are proposed to be removed from the project site in order to implement the Camp Ramah expansion facilities. The horse stalls, two sports courts, and a handicapped parking space are all proposed to be constructed within the California Annual Grassland habitat that is bordered Coast Live Oak Woodland. In order for these developments to "fit" in the proposed construction sites, four oak trees must be removed. Destruction of these four mature oak trees (in addition to clearing of the understory natural grassland that is inhabited by two locally rare plant species, and water pollution resulting from horse waste) will result in avoidable significant impacts. Such impacts and permanent loss of oak trees can be avoided by relocating the expansion facilities to the available land within the citrus orchard that exists south of the existing house and north of the proposed sports field.

D. MANDATORY FINDINGS OF SIGNIFICANCE: Based on the information contained with Section B6:	**Yes/Maybe**	**No**
1. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of major periods of California's history or prehistory?	X	
2. Does the project have the potential to achieve short-term, to the disadvantage of long-term, environmental goals? (A short-term impact on the environment is one that occurs in a relatively brief, definitive period of time while long-term impacts will endure well into the future.)	X	
3. Does the project have impacts that are individually limited, but cumulatively considerable? "Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effect of other current projects, and the effect of probable future projects. (Several projects may have relatively small individual impacts on two or more resources, but that total of those impacts on the environment is significant.)	X	
4. Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?		X

E. DETERMINATION OF ENVIRONMENTAL DOCUMENT:

On the basis of this initial evaluation:

[ ]	I find the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION should be prepared.
[X]	I find that although the proposed project could have a significant effect on the environment, there would not be a significant effect in this case because the mitigation measure(s) described in section C of the Initial Study will be applied to the project, A MITIGATED NEGATIVE DECLARATION should be prepared.
[ ]	I find the proposed project, individually and/or cumulatively, MAY have a significant effect on the environmental, and an ENVIRONMENTAL IMPACT REPORT is required.
[ ]	I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environmental, but at least on e effect 1) has been adequately analyzed in and earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
[ ]	I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

David L. Magney (Biological Resources Initial Study Preparers)

15 March 2002
Date