Historic Biological Reports
Scan Control Sheet

County Project Number(s): CUP-5144

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

Report Date (Month/Day/Year): 02/01/2000

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

3.5 BIOLOGICAL RESOURCES

3.5.1 Setting

a. Regional Biological Context. The five sites under consideration all lie within the Oxnard Plain, a generally level coastal plain that has largely been developed for agricultural and urban uses. Native biological resources within the coastal plain tend to be concentrated along the stream and river systems, in particular, the Santa Clara River and Calleguas Creek. The Santa Clara River generally forms the westerly boundary of the plain, flowing along the south side of the City of Ventura and draining into the Pacific Ocean south of the Ventura Harbor. Calleguas Creek is generally located on the easterly end of the plain, dividing the agricultural lands of the plains from the native scrub habitats of the western Santa Monica Mountains. Calleguas Creek discharges into the Pacific Ocean at Mugu Lagoon, a biologically important salt and brackish water estuarine system that is the largest wetland in the County. Similarly, the Santa Clara River mouth is also an important estuarine system that provides critical migratory habitat for thousands of shorebirds, as well as breeding habitat for many resident birds, mammals, fish, and reptiles.

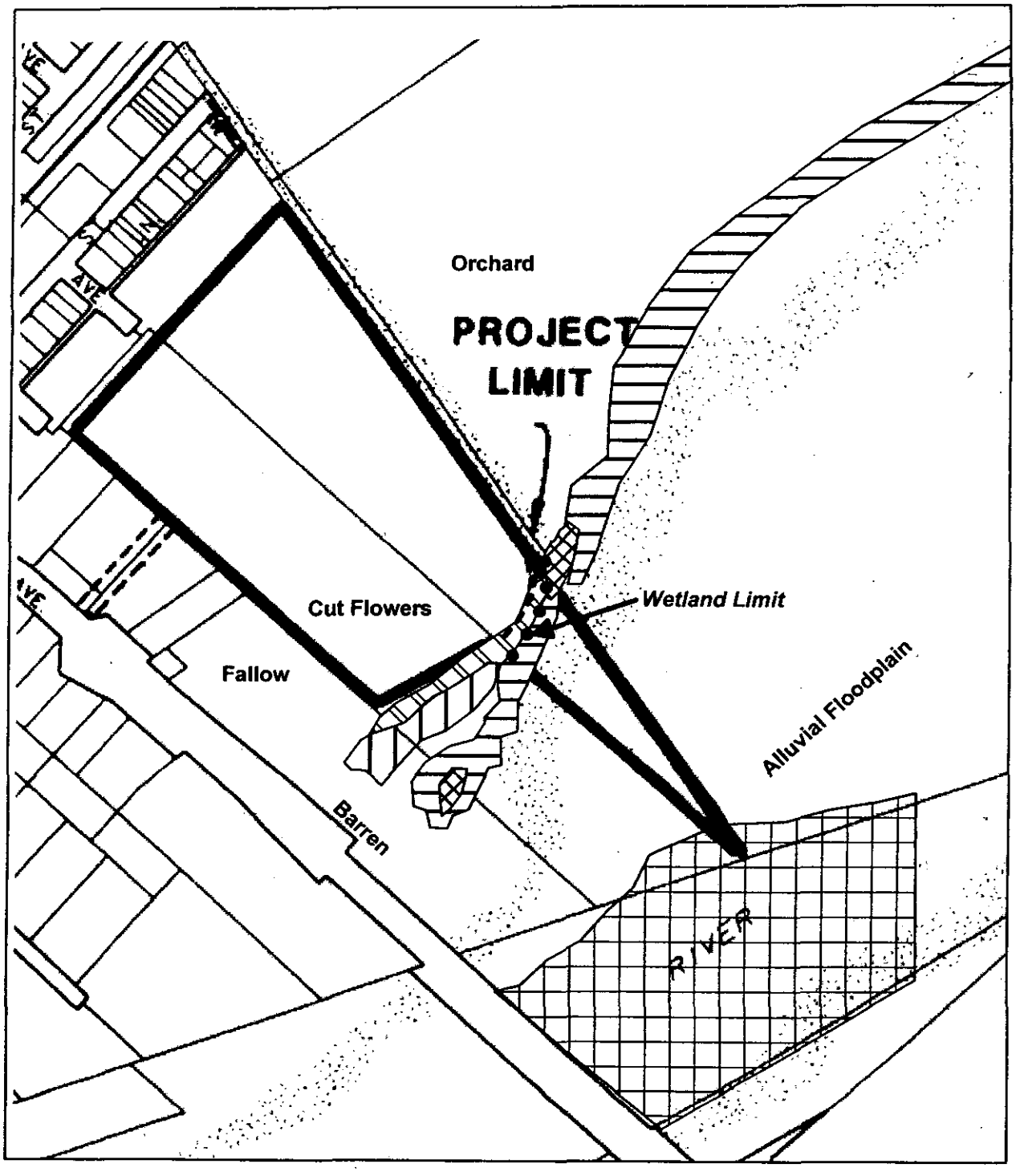
b. Site Specific Biological Resources. The following discusses the biological resources that are present at and adjacent to the individual sites.

Saticoy Site. This 40-acre site currently is used for cut flower and nursery stock farming on the primary northern end of the parcel. Aside from these agricultural uses, some ornamental landscaping, including trees, is adjacent to the residence.

The southern portion of the site transitions to the Santa Clara River floodplain. The top of the bank at this location is highly disturbed and dominated by non-native weeds, particularly castor bean and fennel. Waste material (old farm equipment, plastic sheeting, cut flower stalks and other green wastes) has been disposed throughout this area. Vegetation south of the castor bean and fennel transitions into mixed areas of disturbed coastal sage scrub on floodplain terraces with mulefat scrub in depressions. Dominant plants in the sage scrub include California sagebrush, black sage, and saltbush with a dense understory of annual grasses and weedy herbs (Figure 3.5-1). The sage scrub is highly disturbed by dirt bike tracks that weave through it.

Mixed willow scrub (*Salix exigua* and *S. lasiolepis*) is present at the base of the slope at the southeast corner where water from an adjacent flood control channel exists and at the southwest corner. Along most of the base of the slope where a low flow channel for the river exists, the native willow and mulefat scrub vegetation has been largely replaced by false bamboo (*Arundo donax*). A single black cottonwood is located adjacent to the willow scrub, while a few California walnuts are present on the upper terraces in the coastal sage scrub. Further to the south of the low flow channel, the broad floodplain of the river is generally devoid of significant vegetation, with a few scattered mulefat found on the alluvial sand and gravel deposits.

Animals seen within the agricultural portion of this site during a field visit on September 13 were limted to birds tolerant of agricultural operations, including Brewer's blackbird, house



Biological Resources at the Saticoy Site Figure 3.5-1

finch, killdeer, American pipit, and Anna's hummingbird. The vegetation associated with the bank and terraces of the Santa Clara River contained several animals common to these habitat types. Mammals seen included desert cottontail and sign of pocket gopher, coyote, California ground squirrel, and various mice.. Numerous side-blotched and western fence lizards were seen. Birds noted included turkey vulture, red-tailed hawk, rough-legged hawk, California quail, mourning dove, Anna's hummingbird, barn swallow, Bewick's wren, European starling, California towhee, spotted towhee, and lesser goldfinch.

El Rio Site. This 45-acre site consists of agricultural land that has recently been prepared for strawberry farming (furrows, irrigation pipes, and plastic in place) and no vegetation is present within the site except for a few weedy species along the Vineyard Avenue right-of-way. While the site itself lacks important biological resources, directly northwest of the site is a former gravel pit that contains ponded water. This ponded water provides an open water source adjacent to the Santa Clara River that is utilized by a number of birds. Species seen during a brief field visit on September 13, 1999 included mallard, coot, double-crested comorant, eared grebe, ring-billed gull, western gull, Foster's tern, snowy egret, and black-necked stilt. The pit has vertical sides, with the ponded water about 20 feet below the site elevation. Between the project site and the pit is a maintained access road and mixed native and non-native scrub containing mulefat, saltbush, tree tobacco, and numerous weedy annuals.

Government Center Site. This 80-acre site presently houses the County Government Center Complex. Native biological resources are lacking at the site, which is heavily landscaped along the borders with tall trees and shrubs. The larger trees provide roost sites and breeding areas for a variety of urban-adapted wildlife, particularly birds such as mockingbird, rock dove, starling, mourning dove, house finch, house sparrow, and Anna's hummingbird. The larger trees also provide temporary roost sites for larger raptorial species, including red-tailed hawk and American kestrel, though neither species would appear to breed at this site.

Del Norte Site. This site consists of 52 acres of agricultural land, set within an actively farmed area just south of U.S. Highway 101 at the Del Norte Boulevard exit. Aside from crops, vegetation on the site is minimal, comprised of common weedy species. No important biological resources are located near this site, though the Revolon Slough channel is located about 1,400 feet east. However, the slough at this location is a man-made trapezoidal channel with riprap and concrete banks.

Lewis Road Site. This site contains vacant land with sparse ruderal vegetation comprised of weedy non-native species, and a complex of vacant buildings and surface parking lots in the southern portion of the site. Non-native herbs and grasses are the predominant vegetation, with mustard, filaree, Italian thistle, prickly lettuce, telegraph weed, wild oats, foxtail chess, ripgut grass, fennel, and various brome grasses being common where they have not been removed as part of regular maintenance. Some limited ornamental landscaping is adjacent to the buildings and a few trees near the paved driveway that leads from Lewis Road to the building complex, as well as along Lewis Road. Important biological resources nearby, but off the site, include the riparian habitats of Calleguas Creek, about 1,400 feet to the southeast and the western Santa Monica Mountains, about one mile east.

c. Regulatory Setting. Federal, state, and local authorities under a variety of legislative acts share regulatory authority over biological resources. Primary authority for general biological resources lies within the land use control and planning authority of local jurisdictions, in this instance, the County of Ventura. The California Department of Fish and Game (CDFG) is a trustee agency for biological resources throughout the state under CEQA and also has direct jurisdiction under the state Fish and Game Code. Under the state and federal Endangered Species Acts, the CDFG and the U.S. Fish and Wildlife Service (USFWS) also have direct regulatory authority over specially designated organisms and their habitats. The U.S. Department of the Army, Corps of Engineers also has regulatory authority over specific biological resources, namely wetlands and waters of the United States, under Section 404 of the federal Clean Water Act.

In response to their legislative mandates, regulatory authorities have defined sensitive biological resources as those specific organisms that have regionally declining populations such that they may become extinct if population trends continue. Habitats are also considered sensitive biological resources if they have limited distributions, have high wildlife value, include sensitive species, or are particularly susceptible to disturbance.

Sensitive species are classified in a variety of ways, both formally (e.g., State or Federal Threatened and Endangered Species) and informally ("Special Animals"). Species may be formally listed and protected as Threatened or Endangered by the CDFG or USFWS or as California Fully Protected (CFP). Informal listings by agencies include California Species of Special Concern (CSC) (a broad database category applied to species, roost sites, or nest sites); or as USFWS Candidate taxa. CDFG and local governmental agencies may also recognize special listings developed by focal groups (i.e., Audubon Society Blue List; California Native Plant Society (CNPS) Rare and Endangered Plants; U.S. Forest Service regional lists).

Vegetation in California is accorded sensitivity rankings by the CNPS and CDFG within the community classification of Holland (1986, 1992), modified as appropriate to conform to more recently accepted series concepts of Sawyer and Keeler-Wolf (1995). Wetlands and riparian habitat are protected by statutes within the Clean Water Act, California Fish and Game Code, and local and regional water quality control boards.

d. Sensitive Biological Resources. A "sensitive biological resource" refers to any rare, threatened or endangered plant or animal species, or those species considered regionally declining by local authorities. Habitats are also considered sensitive if they exhibit a limited distribution, have high wildlife value, contain sensitive species, or are particularly susceptible to disturbance. Sensitive species are classified in a variety of ways, both formally (e.g. State or Federal Threatened and Endangered Species) and informally ("Special Animals"). Species may be formally listed and protected as Threatened or Endangered by the CDFG or USFWS or as California Fully Protected (CFP). Informal listings by agencies include California Species of Special Concern (CSC) (a broad database category applied to species, roost sites, or nest sites); or as USFWS Candidate taxa. CDFG and local governmental agencies may also recognize special listings developed by focal groups (i.e. Audubon Society Blue List; California Native Plant Society (CNPS) Rare and Endangered Plants; U.S. Forest Service regional lists).

This section lists those rare or otherwise sensitive species that were found on the site or that have the potential to occur in the project vicinity. The potential for occurrence of sensitive

resources is based on site characteristics and the known regional distribution and habitat affinities of the species. Lists of sensitive plant and animals as published by the California Department of Fish and Game (April 1999, January 1999, and March 1998) and the United States Fish and Wildlife Service (1998) were used in the preparation of this section.

No sensitive plant species are known to occur within the vicinity of any of the sites nor in the types of habitat available in the vicinty of the project sites. Sensitive vertebrate species of concern known or possibly found at the detention facility sites or local vicinity are listed in Table 3.5-1 State or federally listed species are accorded the highest protection status. The following further discusses the potential for species listed in Table 3.5-1 to occur in the habitats present at the sites.

Table 3.5-1 Sensitive Animals in the Project Vicinity

Common Name	Scientific Name	Agency Status
Fish		
Steelhead trout	*Oncorhynchus mykiss*	FE
Reptiles		
Coast horned lizard	*Phrynosoma coronatum ssp.*	FSC, CSC
Birds		
Cooper's hawk	*Accipiter cooperii*	CSC (nesting)
Sharp-shinned hawk	*Accipiter striatus*	CSC (nesting)
White-tailed kite	*Elanus leucurus*	CFP
Northern harrier	*Circus cyaneus*	CSC (nesting)
Prairie falcon	*Falco mexicanus*	CSC (breeding sites)
American peregrine falcon	*Falco peregrinus anatum*	FE, CE
Merlin	*Falco columbarius*	CSC
Ferruginous hawk	*Buteo regalis*	CSC (winter)
Willow flycatcher	*Empidonax traillii extimus*	FE, SE
Loggerhead shrike	*Lanius l. ludovicianus*	FSC, CSC
Yellow-breasted chat	*Icteria virens*	CSC
Least Bell's vireo	*Vireo bellii pusillus*	FE, SE
Yellow warbler	*Dendroica petechia brewsteri*	CSC
Mammals		
Pallid bat	*Antrozous pallidus*	CSC
Pale big-eared bat	*Plecotus townsendi pallescens*	FSC, CSC
Small-footed bat	*Myotis ciliolabrum*	FSC
Long-eared myotis bat	*Myotis evotis*	FSC
Fringed bat	*Myotis thysanodes*	FSC
Long-legged bat	*Myotis volans*	FSC
Yuma myotis	*Myotis yumanensis*	FSC

CE = California Endangered
CFP = California Fully Protected
CSC = California Species of Concern
FE = Federal Endangered
FSC = Federal Species of Concern
FT = Federal Threatened
Source: CDFG 1999, 1998.

The Southern California Evolutionarily Significant Unit (ESU) of the southern California steelhead (*Oncorhynchus mykiss*) was listed as federally endangered on August 11, 1997. This ESU includes the Santa Clara River population, which migrates through the Ventura area to its spawning upstream spawning areas. Onsite soil disturbances or potential surface water quality impacts

from development of the project have the potential to degrade the steelhead habitat in the Santa Clara River.

Habitat for coast horned lizards is limited to the southern portion of the Saticoy site within the sage scrub and alluvial wash areas. Habitat for this lizard is lacking at all other sites due to past and continuing soil disturbance. The habitat present at the Saticoy site is considered of low to moderate value since several harvester ant colonies (its primary prey) were present, but the grass cover is relatively dense outside of the dirt bike trails. However, this species has been recorded within similar habitat approximately two miles downstream and it is probable that it occurs in the general vicinity. No horned lizards were seen during the site survey.

A variety of raptors (birds of prey) that could utilize the habitats present at the various facilty sites are considered sensitive due to declines in population levels. Cooper's hawk have been observed foraging over the Camarillo Regional Park and at the Saticoy settling ponds and may occasionally forage at the Lewis Road and Saticoy sites, respectively. Sharp-shinned hawk and northern harrier would be winter visitors only to the regional area and would not breed locally, which is the time period during which they are considered sensitive. Prairie falcon and peregrine falcon possibly forage at the river mouths and along the riparian habitats of the Santa Clara River and Calleguas Creek, but no breeding sites are available near any of the five sites. White-tailed kites have been observed foraging in open agricultural fields of the Oxnard Plain, roosting in the woodlands along the Santa Clara River, and are known to occur at the Camarillo Regional Park. The open agricultural fields of the Oxnard Plain also provide winter foraging habitat for migratory merlin and ferruginous hawk.

Breeding populations for the endangered willow flycatcher are not known to exist along the Santa Clara River or Calleguas Creek. A single individual was observed approximately 2 miles northeast of the site along the Santa Clara River in 1998, but it did not breed (Labinger and Greaves, 1999).

The loggerhead shrike is a potential inhabitant of the coastal sage scrub habitat at the Saticoy site and may be found in fallow fields, such as at the Lewis Road site. The loggerhead shrike was observed at Camarillo Regional Park, located southeast of the Lewis Road site, and has been observed at the Saticoy settling ponds, located across the river from the Saticoy site. The amount of habitat for this species available at either site is limited, and only transient use of these two sites would be expected.

Yellow-breasted chats are patchily distributed throughout the Santa Clara River and are expected along Calleguas Creek. This sensitive species has marginal potential to breed in the willows at the Saticoy site, but given the disturbances currently experienced at this location and the lack of extensive willow growth, it is likely that the site is used only during migration.

The endangered Least Bell's vireo is known to breed approximately one-half mile east of the Saticoy site along the Santa Clara River. Habitat at the site is marginally suitable, but unlikely to be used for breeding because of existing disturbances. The site survey occurred too late within the season to observe this species, which typically migrates from the area during the last weeks of August. The willow trees and mulefat were checked for nest remains and none were detected.

The sensitive yellow warbler has the potential to breed in the willows and mulefat thickets at the Saticoy site. No yellow warblers were seen or heard at the site during the field visit. The habitat available along the river at this site could support at most one breeding pair.

Most of the listed bat species would be expected to forage throughout the Oxnard Plain, but most particularly in areas of open grassland and scrub habitats. Any of these species could occur as transients at any of the five sites, but generally suitable foraging habitat and roost sites are lacking at the sites.

In addition to sensitive plants and animals, vegetation in California is accorded sensitivity rankings by CNPS and CDFG within the community classification of Holland (1986). Mixed willow scrub such as is located on the southern portion of the Saticoy site is considered a special status habitat type by regulatory agencies due to its declining status in southern California and because it is a wetland community type. Other wetlands and streams such as the Santa Clara River and Calleguas Creek are also protected by regulations promulgated from the state and federal Clean Water Acts, California Fish and Game Code, and by local and regional water quality control boards. The ponded water of the gravel pit next to the El Rio site may also be considered a wetland subject to jurisdictional authority.

3.5.2 Impact Analysis

a. Methodology and Significance Thresholds. The potential for biological resources at the various sites was initially determined by review of aerial photography of the sites and by preliminary site reconnaisances in August 1999. A field reconnaissance of the El Rio and Saticoy sites was performed on September 13, 1999. Dominant vegetation and animal species and their sign (scat, burrows, etc.) at and adjacent to these sites were noted and the location of dominant plant associations mapped for the Saticoy site (Figure 3.5-1). The field survey was performed by driving through the fields and walking through the Santa Clara River terrace area. Survey efforts for rare plants and wildlife species were focused in the plant communities and habitats where listed species had the greatest potential to occur. For plant species, in addition to the CNDDB list, the California Native Plant Society (CNPS) publishes the *Inventory of Rare and Endangered Vascular Plants of California* (CNPS 1994). This list, as contained within the CDFG (1999) *Special Plants List*, was used to identify species of local and/or regional concern. Many of the species on the CNPS inventory list are not legally protected by the state or federal Endangered Species Act, but may be considered sensitive by local authorities.

Project impacts to biota may be determined to be significant even if they do not directly affect rare, threatened, or endangered species. The California Environmental Quality Act (CEQA), Chapter 1, Section 21001 (c) states that it is the policy of the state of California to: Prevent the elimination of fish and wildlife species due to man's activities, ensure that fish and wildlife populations do not drop below self-perpetuating levels, and preserve for future generations representations of all plant and animal communities. Environmental impacts relative to biological resources may be assessed using impact significance criteria encompassing CEQA guidelines, federal, state and local plans and ordinances.
For purposes of this analysis, significant impacts to biological resources may occur if a project action would:

- 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 (CDFG) or U.S. Fish and Wildlife Service (USFWS) (CEQA, Appendix G, IV(a);
- 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 CDFG or USFWS (App. G, IV(b);
- Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including but not limited to, marsh vernal pool, coastal, etc.) through direct removal, filling, or hydrological interruption, or other means(App. G, IV(c);
- 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(App. G, IV(d);
- Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance(App. G, IV(e);
- Conflict with the provisions of an adopted Habitat Preservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan (App. G, IV (f).

The Ventura County Initial Study Assessment Guidelines (November 1992) essentially incorporate the above significance criteria. This document provides the following general guidelines.

- A significant impact to listed endangered, threatened, or rare species would occur if a project would directly or indirectly:
  - reduce species population
  - reduce species habitat
  - restrict reproductive capacity
- A significant impact would result from the direct reduction of, or a substantial indirect impact to, a significant wetland habitat.
- Any direct reduction of, or indirect impact to, a coastal habitat could be considered significant.
- A significant impact to a migration corridor would result if a project would substantially interfere with the use of said area by fish or wildlife. This could occur through elimination of native vegetation, erection of physical barriers, or intimidation of fish or wildlife via introduction of noise, light, development, or increased human presence.

b. Project Impacts and Mitigation Measures.

Impact B-1 Direct facility development at all sites except the Government Center would involve removal of agricultural crops, landscaping, or fallow weedy fields. This is considered a Class III, *less than significant* impact.

Saticoy Site. The proposed development at the Saticoy site would occur within areas that are either in urban landscaping or in long-term agricultural use. Important biological resources are not located within the conceptual footprint of the proposed facility at this site, as shown on Figure 2-8 in Section 2.0, *Project Description*. No sensitive animal or plant species are known to occur within the potential development areas for this site. Significant impacts to sensitive plant or animals or important habitats are not expected to occur as a result of direct facility development.

El Rio Site. Similar to the Saticoy site, important biological resources are not located within the conceptual footprint of the proposed facility at this site (Figure 2-9 in Section 2.0, *Project Description*). No sensitive animal or plant species are known to occur within the potential development areas for this site. Significant impacts to sensitive plants or animals or important habitats are not expected.

Government Center Site. The Government Center site is within an urban area, while the Lewis Road site lacks vegetation besides landscaping. No sensitive animal or plant species are known to occur in the vicinity of the Government Center. Significant impacts to sensitive plant or animals or important habitats are not expected at this site.

Del Norte Site. Similar to the Saticoy site, this site primarily consists of agricultural fields. Important biological resources are not located within the conceptual footprint of the proposed facility at this site (Figure 2-10 in Section 2.0, *Project Description*). No sensitive animal or plant species are known to occur in the site vicinity. Significant impacts to sensitive plants or animals or to important habitats are not anticipated.

Lewis Road Site. Important biological resources are not located within the potential development areas. No sensitive animal or plant species are known to occur within the potential development areas for this site. Significant impacts to sensitive plant or animals or to important habitats are not expected.

Mitigation Measures. No mitigation measures are necessary.

Significance After Mitigation. Impacts are considered less than significant.

Impact B-2 Development could result in indirect encroachment into nearby riparian habitats and possibly affect local migration corridors. This is considered a Class II, *significant but mitigable* impact.

Saticoy Site. The Saticoy site is immediately adjacent to the Santa Clara River floodplain. While the available habitats of this area are highly disturbed by current and ongoing activities, it nonetheless provides habitat for several common resident wildlife species and potential

habitat for several sensitive species, including the endangered least Bell's vireo. While the proposed development footprint would not directly remove any riparian habitat, flood protection by means of a levee that may be needed in the future to protect this site could remove this riparian habitat.

The Santa Clara River is an important corridor for the movement of wildlife and fish (including the endangered Southern California steelhead ESU). It provides a transit corridor for the movement of individual animals from the coastal resources at the rivermouth to the upland habitats of the Santa Clara River valley and adjacent mountains. It may also serve as a habitat linkage that maintains the genetic diversity of locally common and uncommon species. The value of this wildlife corridor is affected by current recreational activities in the river floodplain that produce disturbing noise levels, human activity, and remove riparian vegetation. The proposed Juvenile Justice Complex would increase the number of people present in the area and may result in increased disturbance in the river. In addition, lights from the detention facility could discourage the use of riparian areas by nocturnal animals that are sensitive to high light levels.

Policy 1.3.2.1 of the Saticoy Area Plan states that vegetation in flood control channels should be left undisturbed to the extent feasible. The conceptual site plan for this site indicates that the development would not disturb any riparian vegetation and no inconsistencies with this policy are anticipated. Any future flood control levee that may be proposed would need to comply with this policy.

Policy 1.5.2-4 of the County General Plan requires a minimum setback of 100 feet from significant wetland habitats to mitigate the potential impacts on these habitats. The size of the buffer area may be increased or decreased based on evaluation and recommendation by a qualified biologist and approval of the decision-making body. Significant wetland habitats are located adjacent to the Saticoy site as discussed above in the environmental setting. These wetlands are located at the toe of the riverbank, approximately 20 feet from the top of the bank. As discussed above, this site is in agricultural use that extends to the top of the bank, and in some locations, disturbance associated with the agricultural use extends beyond the top of bank. The proposed site development line is located at the top of the bank, or approximately 20 feet from the nearest significant wetland at the southeast corner (see Figures 3.1-1 and 3.5-1). Since development this close to the riparian habitats of the river could have a significant indirect impact, the proposed project would be considered inconsistent with this policy. Mitigation measure B-2(c) would resolve this inconsistency.

El Rio Site: Riparian habitats near this site are limited to within the Santa Clara River floodplain. In addition, Policy 1.4.1.1 of the El Rio/Del Norte Area Plan requires the protection of biological resources of the Santa Clara River. The El Rio site is located about 1,000 feet from the river. The deep gravel pit located north of the site would also eliminate the potential for indirect impacts to the riparian resources of the river. Development of the proposed project at this site would not appear to conflict with this policy.

The open water area at the bottom of the gravel pit is classifiable as a "wetland" and General Plan Policy 1.5.2-4 may be applicable to this area. The proposed development concept for this site would place a road, parking facilities, and a track within about 30 feet of the edge of the gravel pit. Because this is a man-made feature that generally lacks wetland vegetation, it may

not qualify as a "significant wetland" under Policy 1.5.2-4. Nonetheless, the ponded water of the gravel pit is used by several species of water birds for loafing and feeding. The sheer bank of the gravel pit isolates the ponded water from potential disturbances associated with urban uses located outside of pit property. Therefore, development as proposed at the El Rio site would be considered generally consistent with Policy 1.5.2-4.

Government Center Site. This impact does not apply to the Government Center site.

Del Norte Site. This impact does not apply to the Del Norte site.

Lewis Road Site. This impact does not apply to the Lewis Road site.

Mitigation Measures. The following mitigation measures are recommended for the Saticoy site.

B-2(a) If wetlands and/or riparian habitat are subject to permitting or consultation with public agencies, such as USFWS, CDFG, or NMFS, setbacks or conditions regarding wetlands and riparian habitat shall be observed.

B-2(b) If the riparian area on the south end of the site is disturbed by future flood control facilities, a Mitigation Plan for areas of disturbance shall be prepared. Restoration and mitigation shall be with locally occurring native wetland and riparian species at a ratio of 2:1. The plan shall include, but not be limited to the following components:

1) Performance criteria (i.e., what is an acceptable success level of *revegetation to mitigate past impacts);*
2) Monitoring effort (who is to check on the success of the revegetation plan, how frequently);
3) Contingency planning (if the effort fails to reach the performance criteria, what remediation steps need to be taken);
4) Irrigation method /schedule for wetland elements (how much water is needed where and for how long); and
5) Provisions for the removal of non-native invasive species (including details regarding the type and use of herbicides in and near aquatic habitat and sensitive species).

B-2(c) Urban development (roads, buildings, paths) associated with the Juvenile Justice Complex shall be setback at least 100 feet from the toe of the riverbank or 50 feet from the top of any future levee, whichever is greater. The area between the top of bank (or levee) and development shall be revegetated with native coastal sage scrub species and may be used as a bioswale (first flush basin) for water quality purposes. The edge of development shall also be fenced to restrict access into the river from the site.

B-2(d) Lighting adjacent to the Santa Clara River shall be shielded from the riparian habitat and directed inward toward the development. Transient light should not exceed 1 foot-candle, measured on the ground, at 50 feet upland from the top of the bank.

Significance After Mitigation. This impact does not apply to any site except the Saticoy site. Implementation of the above mitigation measures would reduce impacts at the Saticoy site to a less than significant level.

Impact B-3 Development at the Saticoy, El Rio, or Lewis Road sites could result in the export of roadway contaminants to local drainages. This is considered a Class II, *significant but mitigable* impact at these three sites.

Saticoy Site. Long-term run-off from impermeable surfaces onsite would increase runoff of storm pollutants from roads and parking surfaces such as oils, grease, heavy metals, and rubber. During storm events, these pollutants would be transported to drainage systems where they could cause long-term significant impacts to water quality. Impacts to water quality could in turn affect oxygen, pH, temperature, and nutrient levels of the receiving waters. Siltation could also bury eggs, insects, algae, and vegetation. The offsite drainages support common and sensitive fish and wildlife species that could be affected by the degradation of wetlands and water quality. The Saticoy site immediately abuts the Santa Clara River and the Franklin-Watson Barranca, either of which could be adversely affected by increased runoff of urban pollutants from the site.

El Rio Site. The El Rio site is adjacent to the ponded wetland of a former mining gravel pit and also within about 1,000 feet of the Santa Clara River. Potential impacts to biological resources due to changes in surface water quality would be similar to those described for the Saticoy site. Impacts at this site are considered potentially significant.

Government Center Site. This site is completely developed with urban uses and is not located near any major watercourses. Therefore, significant biological impacts relating to reduced water quality are not expected due to development at the Government Center site.

Del Norte Site. The Del Norte site is not near any significant watercourse. Therefore, biological impacts relating to contaminated runoff from this site are considered less than significant.

Lewis Road Site. This site is within about 1,200 feet of Calleguas Creek, which could experience biological impacts relating to changes in water quality similar to those described for the Saticoy site. Impacts at this site are considered potentially significant.

Mitigation Measures. Mitigation measures WQ-3(a), (b), and (c) recommended in Section 3.3, *Water Resources*, would involve the development of drainage basins, use of appropriate filtration systems, and maintenance of both systems. Implementation of these requirements would mitigate biological impacts relating to changes in surface water quality.

Significance After Mitigation. Implementation of the above mitigation measures and requirements of the NPDES permit for the site (see Section 3.3, *Water Resources,* for a discussion of these requirements) would reduce impacts at all sites to a less than significant level.

c. Cumulative Impacts. Currently planned and pending development in the Saticoy area would not encroach into the Santa Clara River. However, cumulative urban development in the vicinity of the Saticoy site may result in further encroachment into the significant riparian habitat of the Santa Clara River. Regulatory policies by the California Department of Fish and Game and the US Army Corps of Engineers would serve to reduce cumulative biological impacts to a less than significant level through the mitigation requirements of these agencies.

The El Rio site is surrounded by industrial and agricultural uses. Additional development is not anticipated in the area at this time, although future cumulative development could encroach into the riparian Santa Clara River. Regulatory policies in place as described above would be expected to mitigate any cumulative impacts to riparian resources.

The Government Center site is already within an urbanized area. Therefore, implementation of the project at this site would not contribute to any significant cumulative impacts to important biological resources.

Agricultural lands and business park uses surround the Del Norte site. Although the Oxnard General Plan calls for additional business park development in the area, no significant biological resources are known to occur in the site vicinity. Therefore, cumulative biological impacts in the Del Norte site vicinity would not be significant.

The Lewis Road site is surrounded by agricultural lands that are zoned for such use. Therefore, no extensive cummulative development that may directly affect biological resources near this site is anticipated.

Cumulative development of urban uses within the watersheds of Calleguas Creek and the Santa Clara River would, similar to the proposed project, result in the discharge of urban-related contaminants to these water bodies. Implementation of the Regional Water Quality Control Plan for these watersheds by the Regional Water Quality Control Board and implementation of existing and future planned regulations regarding storm water run-off would serve to reduce the potential for cumulative water quality problems that could adversely affect sensitive biological resources along local drainages.