



CEQA STATUTORY EXEMPTION FOR RESTORATION PROJECTS (SERP) CONCURRENCE REQUEST

Completion and submission of this form is voluntary. This form may be submitted to request concurrence from the Director of Fish and Wildlife pursuant to Public Resources Code section 21080.56.

Submit this form (pdf) and all attachments via the Department’s [Environmental Permit Information Management System \(EPIMS\) Document Repository](#).

1. LEAD AGENCY

Lead Agency Name:	Ventura County Resource Conservation District
Contact Person’s Name:	Desirae Braga
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City, State, Zip:	Somis, Ca, 93066
Contact Person’s Telephone:	(707) 301-7922
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2. PROJECT PROPONENT

Check Box and Skip to Number 3 if Same as Lead Agency

Business/Agency/Organization:	Wood-Claeysens Foundation
Contact Person’s Name:	Scott Werner
Street Address:	P.O. Box 30586
City, State, Zip:	Santa Barbara, California 93130
Contact Person’s Telephone:	805-272-5871
Contact Person’s E-mail:	scott@wernerbio.com

3. PROJECT INFORMATION

A. Project Name:	Taylor Ranch Arundo Removal Project Phase 4
B. County or Counties:	Ventura County
C. Lat./Long. Coordinates:	34.286278, -119.308571
D. Estimated Project Start/End Dates:	2023-2028

E. Provide a brief description of the Lead Agency’s discretionary approval pursuant to CEQA.

The Ventura County Resource Conservation District is a special district of the state and is in approval of this project. The Ventura County Resource Conservation District has determined that the Taylor Ranch Arundo Removal Project will conserve, enhance and restore habitat, assisting in the recovery of California Fish and Wildlife and their habitat, through removing Arundo and other invasive species, further detailed below, for the public and ecological benefit provided by this action.

This project is proposed to be an activity undertaken by Wood-Claeysens Foundation, which is supported in part through regulatory expertise provided by Ventura County Resource Conservation District (VCRCD), funded through a contract with the VCRCD.



F. Provide a brief description of the Project location, size, and funding sources. Please cite and attach any supporting documents.

The project is located on the lower Ventura River, and arundo is proposed to be removed within a general project area of approximately 213 acres on parcels owned by the Wood-Claeyssens Foundation (see Attachment A). Approximately fifteen acres of arundo-infested riparian forest and scrub have been identified for treatment across 127 habitat patches within parcels 060-0-310-165, 060-0-310-185, and 068-0-141-015 located in unincorporated Ventura County), and parcels 060-0-320-195 and 071-0-120-075 which are located within the City of Ventura. Several non-Foundation owned parcels will be used for access. The landowner, the Wood-Claeyssens Foundation, will fully fund this project in an effort to improve habitat quality, restoring native riparian vegetation and the recovery of species that depend on it.

G. Provide a brief Project description, including any post-restoration work, operation and maintenance, or other related activities. Summarize the Project's expected environmental benefits (e.g., acres or stream-miles restored/enhanced, species benefitted, etc.). Please cite and attach any supporting documents.

The project will consist of the removal of *Arundo donax*, an invasive weed that is rated as High according to the California Invasive Plant Council. A weed-abatement contractor will use manual removal with foot crews, hand tools (e.g., chainsaws, loppers) and herbicide (primarily cut and daub, with follow-up spraying of resprouts) to remove the arundo while under the supervision of a biological monitor. A single crew of 4 to 8 workers plus the biological monitor will be deployed on site. Removal of the Arundo canes will be moved to an access road, chipped and hauled. The crew will work approximately ten days per month, with primary work activities to be conducted outside of the nesting bird season from approximately mid-September to January 31. Several additional invasive woody plant species will also be opportunistically removed as the arundo is treated; these include tree tobacco (*Nicotiana glauca*), castor bean (*Ricinus communis*), and tamarisk (*Tamarix spp.*).

The herbicide will be an aquatically approved formulation of glyphosate such as Round-Up Custom. Glyphosate is highly effective in treating Arundo and has a very low propensity for incidental effects to nearby native species when applied properly (Durkin 2003). After it is directly applied to foliage or freshly cut Arundo stems with a sponge, it is translocated throughout the plant and directly inhibits chloroplast function. Root absorption to non-targeted species is minimal because glyphosate readily binds to soil particles and is immobilized. It is primarily broken down by soil microbes and has little to no potential for bioaccumulation (Schuette 1998).

The project is seen as a continuation of the Taylor Ranch Arundo Removal Phase 1 through Phase 3 projects (2008 through 2021). In Phases 1 and 2, Arundo removal was accomplished using mechanical removal with a masticator followed by maintenance with hand tools and foot crews. Phase 3 consisted exclusively of hand tool and foot crews and reached deeper into the river profile. The proposed Taylor Ranch Removal Project, Phase 4, will continue maintaining the areas that were previously treated within the Wood-Claeyssens Foundation land, will areas proposed for treatment during Phase 3 but were not reached, and will expand the overall treatment area slightly upriver to include all of the northernmost Phase 3 parcel. This project is designed to benefit the riparian ecosystem on the Ventura River and its associated native plant communities and sensitive species. Sensitive plant species that have a high likelihood or are known to occur include Plummer's baccharis, Southern California black walnut and southwestern spiny rush. Listed or sensitive wildlife species known to occur or which may occur in the project area include monarch butterfly, tidewater goby, Southern California steelhead distinct population segment, California red legged frog, tri-colored blackbird, Western yellow-billed cuckoo, Least Bell's vireo, and Southwestern willow flycatcher. Continued treatment of invasive Arundo will improve critical habitat for these listed species, eliminate competition for native riparian communities, and maintain habitat connectivity and wildlife corridors. This continued treatment will happen every year during the appropriately allotted time frame, outside of the nesting season, every year, and in locations deemed appropriate depending on how water availability influenced regrowth and resprout of previously treated stands of Arundo. This project will provide these benefits to the entire 213-acre area of the Ventura River where Arundo and other invasive plant removal will take place, see page 55 of attachment (Taylor Ranch Arundo Removal Phase 4 figure 1).



H. CDFW recommends public outreach and coordination with interested parties. Please provide a summary of engagement with tribes, agencies, and other interested parties. Be careful not to include any sensitive or confidential information. Please cite and attach any supporting documents.

The Ventura County Resource Conservation District (VCRCD) has contacted the tribal representatives for the Chumash Ventureño tribe. The Ventureño tribal advocate has reviewed the project description and discussed it with VCRCD. After a discussion with the team at the Advocates for Indigenous California Native Language Survival, the Chumash representative called VCRCD on April 5, 2023 and said they suggest a tribal monitor or an initial survey of the area. The advocate discussed the reasoning for why they suggested a monitor, because of the culturally rich area and the curiosity of what the flooding that recent rains may have brought from upstream. However, due to the targeted hand-removal of invasive species and lack of soil disturbance beyond foot traffic, no impacts to cultural resources are expected.

Additionally, Wood-Claeysens has consulted with the Army Corps of Engineers (the Corps) via email on November 2, 2022 and confirmed that project activities will not require authorization by the Corps, as the project does not include any proposed fill or discharge to occur within Section 404 or Section 10 Jurisdiction.

The State Water Resources Control Board has been contacted and the process of obtaining a Clean Water Act section 401 Water Quality Certification Action permit has been started.

4. REQUIRED DETERMINATIONS

Provide a full description for each determination below:

A. The Project is exclusively one or both of the following: (1) a project to conserve, restore, protect, or enhance, and assist in the recovery of California native fish and wildlife, and the habitat upon which they depend, or (2) a project to restore or provide habitat for California native fish and wildlife. Please cite and attach any supporting documents.

The VCRCD has made the determination that the Project is exclusively both (1) a project to conserve, restore, protect, or enhance, and assist in the recovery of California native fish and wildlife, and the habitat upon which they depend, and (2) a project to restore or provide habitat for California native fish and wildlife. The Ventura County Resource Conservation District has determined that this project will benefit fish and wildlife as supported by the attached Project Description and Biological Assessment prepared by Werner Biological Consulting.

B. An eligible project may have incidental public benefits, such as public access and recreation. Please cite and attach any supporting documents.

The VCRCD has determined that the Project will have incidental public benefits such as enhanced water availability and water quality through invasive species mitigation. This will also provide opportunity for enhanced recruitment of native vegetation. Still more, removal of Arundo will help mitigate for wildfire risk. Increased opportunity for native species recruitment will be a first, and crucial step in building ecosystem and community resilience, resulting in long-term benefits for the surrounding area, again in water quality, wildfire risk and climate crisis management through more effective carbon sequestration that, again, enhances water quality through native species establishing and more easily mitigating for soil erosion, and managing for wildfire risk by removing vegetation associated with wildfire risk like Arundo.

C. The Project does both of the following: (1) Results in long-term net benefits to climate resiliency, biodiversity, and sensitive species recovery; and (2) Includes procedures and ongoing management for the protection of the environment. Please cite and attach any supporting documents.



Overview:

The VCRC has determined that the Project results in long-term net benefits to climate resiliency, biodiversity, and sensitive species recovery; and includes procedures and ongoing management for the protection of the environment. Incidental public benefits include enhanced water availability and water quality through invasive species mitigation. This will also provide opportunity for enhanced recruitment of native vegetation. Still more, removal of Arundo will help mitigate for wildfire risk. Increased opportunity for native species recruitment will be a first, and crucial step in building ecosystem and community resilience, resulting in long-term benefits for the surrounding area, again in water quality, wildfire risk and climate crisis management through more effective carbon sequestration that, again, provides habitat for sensitive native species such as Least Bell's Vireo, enhances water quality through native species establishing and more easily mitigating for soil erosion, and managing for wildfire risk by removing vegetation associated with wildfire risk like Arundo.

Long-Term Net Benefits to Climate Resiliency:

Giant reed (*Arundo donax*) exacerbates numerous climate crisis issues, including but not limited to increasing the prevalence and severity of wildfires in the region. This plant grows in riparian corridors, and can grow as tall as riparian trees and shrubs, but will dry down, creating a matchstick effect that can result in high-intensity wildfires. This process can result in a positive feedback loop, where Arundo increases the intensity and prevalence of wildfire, which results in a greater dominance of Arundo (Coffman et al. 2010, Suarez et al 2021). Wildfires in riparian zones pose a substantial threat, through the release of excessive amounts of carbon into the atmosphere, as well as through damaging water quality and endangering wildlife and their habitats. The resulting enhancement in native vegetation will improve the river's function as a carbon sink. Please refer to the Taylor Ranch Arundo Removal Project Phase 4 Description and Biological Assessment, attached.

Long-Term Net Benefits to Biodiversity:

As of right now, the Ventura River watershed is heavily impacted by a high density of canes of *Arundo donax* throughout the watershed. When left unchecked, the fast growth rate of *Arundo donax* creates dense monotypic stands that change not only the vegetative communities of the streams it inhabits but also the abiotic factors of those riparian communities. This inundation with a non-native invasive species decreases the opportunity for the full range of local native vegetation to establish, thus decreasing the botanical biodiversity present throughout the watershed. This decreased biodiversity of vegetation in the watershed has a cascade effect on the overall biodiversity in the watershed, providing a smaller range of microhabitat types for wildlife species, as well as other taxa, to establish within the watershed. Please refer to the Taylor Ranch Arundo Removal Project Phase 4 Description and Biological Assessment, attached.

Long-Term Net Benefits to Sensitive Species Recovery:

This project will have a positive effect on a number of locally known, rare species, including but not limited to southern steelhead, California red-legged frog, and Least Bell's Vireo. These species rely, at least in part, on aquatic habitats with dense shrubby vegetation, such as that provided by native willow species (*Salix* spp.) in the riparian forests. The presence of Arundo, particularly once it becomes dominant, excludes most native species such as native willows from establishing, thus changing the quality of his riparian habitat. The removal of Arundo would allow for these native species to re-establish themselves, and provide the habitat that these native fauna species rely on. Please refer to the Taylor Ranch Arundo Removal Project Phase 4 Description and Biological Assessment, attached.

Procedures for the Protection of the Environment:

Acting as the lead agency, VCRC will oversee that the mitigation measures are taken for protection to the environment. The Taylor Ranch Arundo Removal Project will use avoidance measures as the primary option to avoid impacts to the environment. The Ventura River is a dynamic ecosystem that encompasses lots of ecotypes and species groups.

Vegetation Protections: Preliminary vegetation surveys have already been performed, and common tree species in the project area have been identified. With the invasion of Arundo, many tree species have been outcompeted, lessening the quality of the riparian habitat for wildlife that depend on it. This project will adhere to the County of Ventura Protection



Regulations and not cut any branches greater than 2 inches. In order to maintain valuable habitat left on the Ventura River, no trees will be removed from the project area and no unnecessary trimming of understory vegetation will occur, only invasive vegetation.

The following *Avoidance and Minimization Measures* (AMMs) shall be incorporated into the Project to minimize or avoid adverse effects to biological resources:

1. All vegetation removal activities will be monitored by a qualified biological monitor to ensure that no adverse impacts to biological resources occur. Pre-activity surveys will be conducted in all work areas to determine the presence of sensitive resources, special-status species, and nesting birds. The biological monitor will have the authority to stop work if sensitive resources or safety issues arise. The biological monitor will be able to redirect work to a different location if necessary.
2. To avoid impacts to nesting birds, Project activities will be conducted between September 16 and January 31, avoiding the nesting-bird season (February 1 to September 15), the Least Bell's Vireo (LBVI) nesting season of March 1 to September 15, the Southwestern Willow Flycatcher (SWFL) nesting season of May 15 to September 15, and the Yellow-billed Cuckoo (YBCU) nesting season of June 15 to September 15.
3. If work must take place during the early nesting-bird season during the month of February, a qualified biologist will conduct a pre-activity nesting bird survey to look for early-nesting species and submit the results to CDFW to request permission to work in the area if no nests are found. Examples of early-nesting species encountered in the month of February during Phase 3 activities include: Anna's hummingbird (*Calypte anna*), Allen's hummingbird (*Selasphorus sasin*), bushtit (*Psaltriparus minimus*), and red-tailed hawk. If nests are found, standard no-work buffers of 500 feet for raptors and 300 feet for other species shall be implemented unless CDFW approves an adjustment proposed by the biological monitor or project manager.
4. If work must take place during the nesting-bird season of February 1 to September 15, a CDFW-approved biologist will determine if the proposed vegetation removal area supports suitable habitat for LBVI, SWFL, YBCU, or other avian Fully Protected Species and Species of Special Concern. Vegetation removal proposed within suitable habitat for these species should be rescheduled to a time outside of their breeding seasons. If work cannot be postponed, presence/absence surveys for these species shall be conducted by an approved, permitted biologist with authorization from CDFW and/or USFWS. If any of these species is detected during the surveys, no vegetation removal work shall take place within 500 feet of the territory or nest unless approved by CDFW and USFWS.
5. The biological monitor shall conduct pre-activity surveys for steelhead migration/rearing conditions and other sensitive aquatic species such as California red-legged frog and western pond turtle. If these listed or special-concern species are found in the Project Area, CDFW, NMFS and/or USFWS shall be notified, and no-work buffers of 500 feet shall be observed unless a smaller distance is approved by the agencies.
6. Vegetation removal shall not be conducted when rain is forecast (with greater than 50 percent probability to occur) at the work site within 12 hours, or within 24 hours after a rainfall event.
7. Treatment areas that are lowest in the river profile should be treated during the dry fall months when the river is at its lowest level. During the winter storm season, work should focus more on easily accessible, upper bank areas and avoid high-flow areas of the river.
8. Crews will use natural openings in the vegetation or existing trails for access. Native tree and shrub branches with diameters less than two inches may be cut with the approval of the biological monitor if clearance is needed for hand-hauling the arundo. Removal of native tree and shrub branches larger than two inches in diameter is not allowed.
9. Cut branches of arundo and other target species shall be hauled to a staging area along the road, chipped, and hauled off-site to a suitable landfill or recycling center. No debris, soil, silt, sand, bark, slash, sawdust, rubbish, oil or petroleum products shall be allowed to enter into or placed where it may be washed by rainfall or runoff into Waters of the State or Waters of the U.S. When operations are completed, any excess materials or debris shall be removed from the work area.
10. Stockpiles shall not be left in the channel overnight. Stockpiles in the staging area should be removed daily but may remain overnight with the landowner's permission if necessary. Such stockpiles must be removed within seven days.
11. All herbicide mixing, cleaning and maintenance of equipment, and related work, shall be performed within approved staging areas along the road and outside of the bed and banks of the river and stream. Drip pans or drip cloths shall be used where necessary, and workers shall always have a fully stocked spill kit on-hand.



12. The biological monitor will provide a pre-work briefing to the work crew that discusses the work methodology, permits, plant identification, protected species/resources present, and the AMMs. The biological monitor will have color printouts of the targeted invasive species, common or sensitive native plant species, and sensitive wildlife species available for reference in the field when needed.
13. Crews will stay within the Project Area limits.
14. Crews will limit dust and noise to the extent possible.
15. Crews will not spray or create new paths into areas with dense riparian habitat or other native vegetation; existing game trails or other access trails will be used while minimizing impacts to native vegetation as much as possible.
16. No grading or construction of access roads will occur. Access by work crews will follow established paths thereby avoiding impacts to native vegetation.
17. Copies of this Project Description and all required permits and supporting documents shall be readily available at work sites at all times during periods of active work and must be presented to any CDFW personnel, or personnel from another agency upon demand.

Ongoing Management for the Protection of the Environment:

This project in its entirety is designed to protect the environment; removing non-native invasives will enhance riparian habitats and buffers, enhancing water quality, increasing habitat and biodiversity for all taxa, and mitigating for wildfire risk. Please refer to the Taylor Ranch Arundo Removal Project Phase 4 Description and Biological Assessment, attached. The Wood-Claeyssens Foundation will treat the arundo until it slows its growth in the winter, and for the following years providing re-treatments throughout the length of the project. The Foundation will continually search for opportunities to remove *Arundo donax* and other invasive species in the future. As stewards of the land, the foundation will ensure that the land they own has high quality habitat for fish and wildlife by doing what they can to ensure there is less competition for native communities.

D. The Project does not include any construction activities, except for construction activities solely related to habitat restoration. Please cite and attach any supporting documents.

The VCRCDC has determined that the Project does not include any construction activities, except for manual removal activities solely related to habitat restoration. The only proposed activities are removal of *Arundo donax* and several other less common invasive plants, using hand tools, foot crews, and herbicide application. No construction is proposed.

5. CERTIFICATION

I certify that I have the authority to determine whether a project is exempt pursuant to CEQA Guidelines section 15025(a)(1), and this Project meets all the requirements described in Public Resources Code section 21080.56, and that I have submitted all the determinations required therein necessary to obtain the concurrence of the Director of Fish and Wildlife.

Desirae Braga

 Lead Agency Signature
 Printed Name and Title: Desirae Braga

Date: 8/14/2023