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.

The Lead Agency may submit this signed form (pdf) and all attachments via the Department's Environmental Permit Information Management System (EPIMS) Document Repository or via email at restorationpermitting@wildlife.ca.gov.

1. LEAD AGENCY

Lead Agency Name:	Ventura County Resource Conservation District
Contact Person's Name:	Jamie Whiteford
Street Address:	PO Box 147
City, State, Zip:	Somis, CA 93066
Contact Person's Telephone:	(805) 764-5132
Contact Person's E-mail:	Jamie.Whiteford@vcrcd.org

2. PROJECT PROPONENT ☐ Check Box and Skip to Number 3 if Same as Lead Agency

Business/Agency/Organization:	Ojai Valley Land Conservancy (OVLC)
Contact Person's Name:	Thomas H. Maloney, Executive Director
Street Address:	PO Box 1092
City, State, Zip:	Ojai, CA 93024
Contact Person's Telephone:	(805) 633-1093
Contact Person's E-mail:	tom@ovlc.org

3. PROJECT INFORMATION

A. Project Name:	Ventura River Watershed Riparian Resilience Program
B. County or Counties:	Ventura County
C. Lat./Long. Coordinates:	Watershed Center-Point: 34.370550, -119.309577
D. Estimated Project Start/End Dates:	December 2024 to December 2034

E. Provide a brief description of the future discretionary Project approval the Lead Agency is considering (see CEQA Guidelines sections 15352 and 15378) and an approximate date range for when the Lead Agency may make that approval if the Lead Agency obtains a SERP concurrence from CDFW.
Pursuant to Public Resources Code 9801-9821 the Ventura County Resource Conservation District (VCRCD) is a public 'Special District' that, in partnership with the Ojai Valley Land Conservancy (OVLC), is undertaking the improvement of the real property of private and public riparian landowners of the Ventura River Watershed, through the implementation of the Ventura River Watershed Riparian Resilience Program.

VCRCD would be the administrator of the Program. The Program will streamline approvals of individual qualifying sub-projects within the Program Area (defined as the riparian corridors of the Ventura River, San Antonio Creek, and all tributaries to these waterways) to remove Arundo and other invasive species and to accelerate the restoration of important riparian habitats. As sub-projects are developed in the future, they may be enrolled in the Program, subject to VCRCD approval.

The Program and all sub-projects and phases are proposed to be an activity undertaken by OVLC, VCRCD, and partners, supported through regulatory and restoration expertise provided by VCRCD. If a SERP concurrence is provided, VCRCD anticipates approving the Program prior to January 1, 2025 and reviewing additional sub-project sites for their applicability under this SERP as they are determined.

As the Program administrator, VCRCD has the discretion to approve the inclusion of individual sub-projects in the Program when those sub-projects meet the Program's detailed eligibility criteria. VCRCD Program inclusion approvals will be formalized through the execution of a contract or Memorandum of Understanding (MOU) between VCRCD and the sub-project applicant that clearly states VCRCD's agreement to help implement the sub-project, as well as the roles and responsibilities of the lead agency and sub-project applicant. An example of a sub-project agreement that may be used for this project is provided in Block E– *Supplemental Documentation*. Following VCRCD's approval of a sub-project's inclusion in the Program through the execution of a contract or MOU based on SERP, VCRCD will file a Notice of Exemption (NOE) with the Office of Planning and Research within 48 hours.

VCRCD anticipates that other state or local agencies may make SERP-based approvals of sub-projects (for example, providing sub-project funding or permit issuance) subsequent to VCRCD's SERP-based Program inclusion approvals of those sub-projects.

Sub-projects proposed for this program must follow the "Use Requirements for Ventura River Watershed Riparian Resilience Programmatic Permits" outlined in Block E–*Supplemental Documentation*.

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

The Program Area includes the riparian corridors of the Ventura River Watershed (VRW), including the Ventura River and all tributary creeks in Ventura County, CA. The Program Area ("project sites" or "sub-projects") described in the 10-year work plan includes approximately 24 river miles, 2,000 acres of riparian corridors, and 130 parcels along Lion Canyon Creek, San Antonio Creek, and the Ventura River from Highway 150 to the Pacific Ocean. As of 2023, 240 acres of invasive Arundo (*Arundo donax*) was mapped within these waterways and reaches of the VRW (Attachment 1, Table 1). The Program area also includes upstream tributaries where prior work has been completed over the past 20 years to remove Arundo and other invasive plants by OVLC and the Ventura County Watershed Protection District (VCWPD). OVLC owns several parcels within the Program Area land but much of the work will take place on other private lands and therefore community engagement and support of riparian landowners is being conducted to ensure participation in this program. The program will be funded through diverse, long-term funding sources such as the California Department of Forestry and Fire Protection and the Wildlife Conservation Board, who have already awarded OVLC more than $3.2 million to kick-start this program for planning, permitting, and initial Phase I activities.

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 VRW Riparian Resilience Program details a phased approach to restoration of the riparian corridors of the Ventura River Watershed that will restore more than 2,000 acres of riparian habitat by eradicating 240 acres of Arundo and a wide range of other invasive plants, benefiting multiple state and federally listed species.

The Program targets on the removal of Arundo (*Arundo donax*) but goes beyond to include a wide range of other invasive plant species known to occur in the VRW and provides guidance for comprehensive restoration and active revegetation with native riparian species. Invasive species include, but are not limited to, castor bean (*Ricinus communis*), scotch broom (*Cytisus scoparius*), tree of heaven (*Ailanthus latissimus*), eucalyptus (*Eucalyptus* spp.), and Virginia creeper (*Parthenocissus quinquefolia*). Additional invasive plant species that may be treated must be listed as High, Moderate, or Limited by Cal-IPC. OVLC or a weed abatement/tree contractor will primarily use manual removal of invasive plants on foot using hand tools (such as loppers, weed whips, or chainsaws), followed by herbicide application; cut-and- daub is the preferred method, but also foliar spray. Other methods of invasive plant removal may include mastication with chipping Arundo to no larger than 4-inch length pieces (not preferred, but may be used for initial removal of Arundo in Ventura River and Lion Canyon Reservoir), Arundo debris removal post-storm from stream channel (by hand or equipment such as mini- excavator), tree felling or climbing/rigging with possible use of skid steer, basal bark treatment/girdling, drill and fill, weed whacking, hand-pulling, solarization, and loosening soil to remove roots/rhizomes. All cut biomass will be removed from the work area and transported to a designated staging area daily. From there, the biomass may be chipped, incinerated, mowed, or used to create upland habitat in sites approved by a qualified biologist. During any removal method, care will be taken to bag all seed heads on site into a contractor bag, which will then be taken off site for disposal. (Attachment 1: See Section 4.1 Treatment & Removal Methods for Target Species and 4.3 Disposal Methods in the attached Work Plan document for details).

An aquatic approved herbicide will be used where necessary and applied under the direction of a Qualified Applicator (QAL). Cut and daub is the preferred method, particularly in sensitive resource areas or residential areas. Foliar spray of herbicide may also be used for re-treatment of Arundo or after use of a mechanical masticator, and for re-treatment of other invasive plants. Selected aquatic approved herbicides are known to be effective for treating Arundo and other invasive plants, while limiting in their incidental effects to nearby native species when applied correctly. See Section 4.2 Herbicide Specifications in the attached Work Plan document (Attachment 1) for more herbicide application details.

This program was developed using a phased approach starting at the most upstream reach of all three waterways and working downstream systematically (Attachment 1, Section 2). Phase I is the initial treatment and the first two re-treatments of Arundo and other invasive species and will take place Fall 2024 through Spring 2029. This initial phase will occur outside of the nesting bird season (February 15 to September 15) due to the large amount of biomass that is anticipated to be removed. Phase I also includes Early Detection Rapid Response (EDRR), which will involve monitoring the distribution and extent of Arundo and other invasive plant species across the project area to detect, treat, and remove new occurrences before they can establish. Phase II involves semi-annual re- treatments of Arundo and emergent invasive species as the project areas begin to re-establish with vegetation post-Phase I and will take place Spring 2025 through Spring 2032. Phase II will also expand project activities to include additional target species as sites continue to be monitored. Phase III includes riparian revegetation and associated maintenance activities (irrigation, weeding, monitoring) to accelerate the natural recruitment of native species and promote bank stabilization, particularly in San Antonio Creek and Lion Creek where the active channel and riparian corridor are constricted by residences and is dynamic. Phase III will take place Fall 2029 through Winter 2034. Phase IV is long-term monitoring and watershed-wide EDRR that will use a variety of methods including ground field surveys, drone surveys, and citizen science efforts to detect new invasive species in the Program Area. Phase IV will take place Fall 2024 through Winter 2034, the entire duration of the proposed 10-year program. Moreover, Phase IV will take place beyond the life of this program as OVLC and VCRCD has committed to stewarding this watershed beyond any perceived timeframe.

To provide for this Program's long-term sustainability and ongoing management, VCRCD will be responsible for administering the Program; making information, permitting, and use requirements available to the public online; upholding the standards set; accurately reporting on sub-projects enrolled; maintaining records of work activities; and ensuring permits are up to date. To increase utilization of the Program, VCRCD will work with other entities to develop Arundo or other invasive plant species removal projects in the Program Area that meet the Program's eligibility criteria. VCRCD will review all sub-projects proposed for the Program; evaluate methods, BMPs, and AMMs proposed and make recommendations as needed; verify sub-project consistency with Program requirements; and approve qualifying sub-projects through a contract or MOU. Once approved, VCRCD will provide copies of permits to the applicant and interface with regulatory agencies on the applicant's behalf. VCRCD will be responsible for ensuring sub-project compliance with the Program and permitting requirements, including timely, accurate reporting to permitting agencies. VCRCD may provide guidance and support beyond this based on its expertise in permitting, invasive species treatment,

and habitat restoration.

To request that a sub-project be included in the Program, sub-project proponents will send VCRCD a sub-project proposal for review that includes the sub-project location, timeline, work area boundary, access and staging locations, target invasive plant species, invasive plant removal methods, and all other pertinent information defined in the Program's use requirements (example attached, Block E– *Supplemental Documentation*). The applicant will also provide a signed copy of the VCRCD use requirements, certifying they have received and reviewed all Program documents and permits. As Program administrator, VCRCD will review sub-projects seeking inclusion in the Program in a timely manner, and VCRCD will have the authority to approve the inclusion of sub-projects in the Program when those sub-projects meet the Program's eligibility criteria.

This Program is seen as a continuation of other projects OVLC and the VCWPD have completed within the upper Ventura River and upper San Antonio Creek watershed. This program aims to increase the pace and scale of riparian restoration by implementing a programmatic approach that targets the spread of Arundo and phased restoration plan that fosters community and climate resilience at the watershed scale.

While the program is broad in scale and scope, it targets Arundo, an aggressive invasive species that poses a difficult, yet tangible problem that negatively impacts on sensitive riparian habitats in many ways:

- Dense, monoculture stands crowd out native vegetation, reducing native cover and impairing wildlife habitat quality;
- Fast growing and highly productive Arundo consumes massive amounts of limited water supplies; estimates as high as 20 acre-feet/acre, 4x more water/acre than native species;
- Thirsty, shallow-rooted Arundo depletes streamflow, which contributes to increasing water temperatures and impaired water quality;
- Plant rhizomes easily break away creating flood hazards during storm events; and
- Tall stands intermixed with dead biomass constitute explosive fuel loads that can facilitate the spread of fire higher into the canopy and cast embers to a one-mile radius.

Arundo removal eliminates these negative impacts and restores riparian function. Individual removal projects can be tedious, intensive, and cost-prohibitive, especially without experience, diligent site planning, and a broader vision. The VRW Riparian Resilience Program brings these pieces together into a cohesive, programmatic, upstream-to-downstream approach that targets Arundo, is inclusive of a wide range of invasive plant species, deploys early detection-rapid response, and restores riparian habitats where indicated to foster resilience. This phased restoration plan will be deployed programmatically throughout the watershed, leveraging a watershed, community-based approach. Eradicating Arundo and restoring riparian corridors of the VRW will provide a wide range of benefits to climate resilience, biodiversity, and sensitive species recovery. This project will restore approximately 240 acres of riparian habitat to natural conditions.

One of the many expected environmental benefits of this project includes habitat connectivity which is critical for dispersal, migration, foraging, and genetic health of plants and wildlife species. Dense monoculture stands of Arundo outcompete native vegetation and act as a physical barrier to dispersal, migration, and foraging for wildlife. Arundo eradication improves habitat quality and connectivity through critical riparian corridors, particularly where listed species occur. This program is proposed to work within USFWS and NMFS designated critical habitat for four species that are assumed to be present in the project sites including: 1) Southern California steelhead trout southern DPS, 2) California red-legged frog, 3) Southwestern willow flycatcher, 4) tidewater goby. This program will benefit 24 miles of habitat connected to the Pacific Ocean and will provide countless benefits to the native species that rely on this corridor. The benefits not only include ecological benefits, but incidental public benefits such as increased groundwater and surface water, fire hazard reduction, and flood mitigation. This Program is anticipated to have a net benefit to the local community as well as the natural environment. See the Biological Assessment for more details (Attachment 2).

H. CDFW recommends direct coordination with all interested California Native American tribes. Please provide a summary of the Lead Agency's engagement with tribes. Be careful not to include any sensitive or confidential information. Please cite and attach any supporting documents.
OVLC has initiated consultation with members of the local bands of the indigenous Chumash tribe. The Chumash are the only interested tribe with lands within the Program Area. Tribal engagement will be ongoing throughout the program lifetime as these representatives plan to be actively involved in all projects and phases.
I. CDFW recommends public outreach and coordination with interested parties and public agencies. Please provide a summary of the Lead Agency's engagement with interested parties and public agencies. Please cite and attach any supporting documents.
In addition to tribal engagement, the VRW Riparian Resilience Program's outreach strategy focuses on three main stakeholder groups: riparian landowners, the public (specifically, the communities of the Ojai Valley), and public agencies. OVLC is actively conducting outreach to each of these groups to generate interest in and support for this high-visibility, multi-benefit, watershed restoration program. Riparian Landowners - Much of the Program area is located on privately owned land, and success of the program relies on participation from these riparian landowners. OVLC will focus on building landowner partnerships and neighborhood support to obtain broad participation. Access agreements will be signed with landowners prior to work activities. Public - The goal of OVLC's community outreach strategy is to build support for and excitement around Arundo removal and riparian restoration. Messaging will not just focus on a plan for Arundo removal but will be paired with a vision for a restored watershed and resilient community. Outreach will be focused on OVLC communications (website, newsletters, emails, social media), local news media, and community meetings. Public Agencies - OVLC will continue to communicate the Program to public agencies and present the Program at local stakeholder meetings (i.e., Ventura River Watershed Council, Ventura County-Weed Management Area Meetings, Ojai Valley Fire Safe Council), as Arundo removal has multiple benefits that are priorities for these entities.

4. REQUIRED DETERMINATIONS

Using substantial evidence and best available science, provide a determination and explanation for each SERP criteria listed 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.

The Ventura County Resource Conservation District has determined this program is exclusively 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.

Please provide an explanation supporting the above determination. Please cite and attach any supporting documents.

Arundo donax is an aggressive invasive plant species that negatively impacts riparian habitats by creating dense monoculture stands that crowds out native vegetation impairing riparian habitat quality and wildlife movement. Arundo consumes substantial amounts of water, with estimates as high as 20 acre-feet which is four times more than native species. By removing Arundo and other invasive plant species, the VRW will have an increase of native plant cover, increase in biodiversity (plant and wildlife), and will provide free movement for species (plant and wildlife) that rely on the VRW corridor. Arundo removal will increase surface and groundwater levels since native plants do not deplete streamflow, increasing water quality and expanding aquatic habitat.

Locally sensitive vegetation communities, such as southern California black walnut woodlands, have been mapped within the program limits and are documented as being pushed out or limited within their niche location of the transition zone between riparian and upland vegetation communities. With the removal of Arundo and other noxious plant species, this sensitive community will be able to spread into its natural place. The enhancement of riparian vegetation that surround the aquatic environments will contribute to overall a healthy ecosystem. Other natural sensitive vegetation communities exist in the VRW and will be provided with a chance to also get back to their natural condition post-invasive plant removal.

Southern California steelhead trout (*Oncorhynchus mykiss irideus* pop. 10; Federally Endangered (FE), State Candidate Endangered (SCE)) are known to occur in the VRW and will have higher quality rearing habitat through increased water quality and increased food availability due to a healthier riparian ecosystem. An increase in surface water availability will also provide more opportunities for juvenile steelhead to migrate to the ocean and mature. Riverbanks with native vegetation will also be more stable during large winter flows when adult steelhead again migrate back to spawn, decreasing debris flows within the river system making upstream migration more passible to anadromous fish.

While southern California steelhead trout were not observed during the biological assessment surveys, southwestern pond turtle (*Actinemys pallida*, Federally Proposed Threatened (FPT), CDFW Species of Special Concern (SSC)), arroyo chub (*Gila orcuttii*; SCC) and two-striped garter snake (*Thamnophis hammondii*; SCC) were all observed in the aquatic environments of the VRW. These species utilize aquatic environments and will also greatly benefit from additional surface water and biodiversity of plants and animals in and directly adjacent to water. In addition to the aquatic environment, the southwestern pond turtle and two-striped gartersnake utilize the land surrounding their aquatic refugia to reproduce, forage, and move territories. The restoration of land surrounding the aquatic habitat by this project will provide a larger territory that will ensure their ability to reproduce with a higher chance of success. It is not enough for these species to just persist, this project will help restore and enhance the upland habitat they require for reproduction, ensuring local populations rebound.

One least Bell's vireo (*Vireo bellii pusillus*; FE, State Endangered (SE)) was heard calling during the biological assessment, from within the riparian scrub next to Arundo stands near the Ventura River estuary. This species is

known to nest along the southern reaches of the Ventura River and is expected to nest in the riparian scrub and riparian woodland with complex vegetation structures. Least Bell's vireo nesting in the VRW has been at a loss due to Arundo, which causes degradation of habitat and fragmentation through the dense stands it creates. Arundo also greatly impacts the southwestern willow flycatcher (*Empidonax traillii extimus*; FE, SE), a species not observed during the biological assessment survey but is known to rely on riparian habitats such as the VRW in southern California. The southwestern willow flycatcher also has designated critical habitat within the program area. Removing Arundo would restore riparian bird species habitat which is critical to their successful reproduction.

The Crotch bumble bee (*Bombus crotchii*; SCE) is known to occur in Ventura County and has recently been listed as a state candidate for endangered. Queen Crotch bumble bees are documented as relying heavily on willow (*Salix* spp.) flowers when emerging from their overwintering grounds. Willows provide large amounts of pollen early in the season (February), which sustains the queen and allows her to collect enough pollen to begin her nest, lay eggs, and begin that year's colony. Riparian restoration provides habitat to many wildlife species on all levels of the food chain, and conserving habitat for foraging bumble bees will continue to help local populations thrive of this endangered species.

This Program Area's coverage is known to support some of the last remaining habitat connectivity for many listed species (plant and wildlife), will provide habitat for sensitive species that are in decline, and will increase biodiversity. The implementation of this program and restoration of the VRW corridor will greatly benefit native plants, fish, and wildlife as our climate changes and communities grow. For a full list of wildlife and plant species observed in the project site, as well as other state or federally listed species that were observed please see the Biological Assessment for more details (Attachment 2).

B. An eligible project may have incidental public benefits, such as public access and recreation.

The Ventura County Resource Conservation District has determined that this program may have incidental public benefits.

Please provide an explanation supporting the above determination. Please cite and attach any supporting documents.

Incidental public benefits include increased water supply. Arundo infestations represent an unnecessary consumptive use in a watershed completely reliant on local water supplies. Notably, water users of the VRW are currently facing a threatened adjudication of groundwater and surface water, and Arundo eradication is widely accepted as a voluntary management action that enhances supply by reducing consumptive use and improving flows, both of which also contribute to healthier riparian habitat.

Other incidental public health and safety benefits include local flood risk being addressed. During storm events, large root masses can dislodge completely from streambanks, clogging critical infrastructure downstream and exacerbating flood risks. Addressing the impacts and costs associated with more frequent and extensive flooding has become a priority for Ventura County and is listed in the 2040 General Plan/Climate Action Plan. Removing Arundo and its associated biomass will help reduce those risks and costs to public agencies and riparian landowners.

One other incidental health and safety benefit is increased wildfire safety for residences in and near the VRW. Removing Arundo from the Program Area (starting at Foster Park) would reduce wildfire risk to approximately 6,767 structures within a one-mile ember cast radius of mapped stands. Arundo eradication eliminates these explosive wildland fuel loads and restores the ecological functions of healthy riparian corridors at the watershed scale, which is critical for Ojai and surrounding communities. These incidental benefits are discussed further in Attachment 1, Section 1.3.2.

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.

The Ventura County Resource Conservation District has determined that this program does both of the following: (1) Results in long-term net benefits to climate resilience, biodiversity, and sensitive species recovery; and (2) Includes procedures and ongoing management for the protection of the environment.

For each criterion below, please provide an explanation supporting the above determination. Please cite and attach any supporting documents.

Long-Term Net Benefits to Climate Resiliency:

This program will create climate resilience through: 1) Increasing the local water supply where Arundo is currently consuming four times the amount of water than native riparian vegetation; 2) Removing noxious plants reduces flood risks during large storm events and this program is directly aligned with Measure 3 (Expand the State's Wetland Restoration Program) of the State of California's Draft Priority Climate Action Plan; 2) Mitigating wildfire hazards through removal of noxious plant species and restoring healthy riparian corridors, which helps create fuel breaks that change fire behavior in addition to removing wildland fuel loads.

Long-Term Net Benefits to Biodiversity:

Large, dense monoculture stands of Arundo are present throughout the Program area which crowd out native vegetation and create homogeneous habitat, fracturing habitat connectivity and creating barriers. Removing the dense Arundo, and other invasive plant species, will increase opportunities for native vegetation to re-establish, which will in turn benefit fish and wildlife habitat and their range in the watershed. species expected to occur in the watershed include California toad (*Anaxyrus boreas halophilus*), threespine stickleback (*Gasterosteus aculeatus*), pacific-slope flycatcher (*Empidonax difficilis*), common yellowthroat (*Geothlypis trichas*), although common, will have more robust populations that will continue to thrive as the riparian habitat they rely on is conserved and enhanced. Native vegetation that is expected to passively revegetate in the VRW habitats includes white hedgenettle (*Stachys albens*), mulefat (*Baccharis salicifolia*), arroyo willow (*Salix lasiolepis*), knotgrass (*Paspalum distichum*), sprangletop (*Leptochloa fusca* ssp. *uninveria*), witchgrass (*Panicum capillare*), cocklebur (*Xanthium strumarium*), California hemp (*Hoita macrostachya*). The diversity of vegetation that will result from project activities creates niche habitats for plants, fish and wildlife, and vegetation communities. Restoring the VRW to its natural condition will create and support the existing biodiversity it offers. See Section 1.3 Program Overview in the Work Plan for more information (Attachment 1).

Long-Term Net Benefits to Sensitive Species Recovery:

This program will conserve and enhance not only wildlife habitat for the four species with USFWS/NMFS designated critical habitat, but will have a positive effect for six listed species observed during field survey's and several other sensitive species determined to have a high likelihood of occurring in the project site: monarch-California overwintering population, Crotch bumble bee, arroyo chub, coastal whiptail, southwestern pond turtle, two-striped gartersnake, south coast gartersnake, and yellow warbler, white-tailed kite, Belding's savannah sparrow (known to occur only within the Ventura River estuary only), and pallid bat. The impacts of Arundo is watershed wide, from the brackish environment in the estuary, to the uppermost reaches of the watershed. Arundo has changed the variety of riparian habitat that sensitive species rely on. By removing Arundo, we restore the diversity of habitats that the VRW used to support and has been lost for decades. These small steps, such as removing invasive plants, can have a long-lasting effect that conserves sensitive species by providing space for them to continue existing; with the goal of local populations not just persisting, but thriving and growing.

The program will also conserve and enhance eight CDFW sensitive natural communities identified to exist in the Program Area: Southern California Coastal Lagoon, Southern California Steelhead Stream, Southern Coastal Salt Marsh, Coastal and Valley Freshwater Marsh, Southern Coast Live Oak Riparian Forest, Southern Sycamore Alder Riparian Woodland, Southern Riparian Scrub, and California Walnut Woodland. These communities are designated as rare and imperiled throughout their known ranges. Removal of invasive plant species removes competition for space and does more than protecting their existing location, it assists them with growth and expansion, creating more connectivity between habitat types and supporting habitat diversity. The long-term benefits of animals in the VRW is dependent on the restoration of all habitat types, including the rare. There is a direct connection in the VRW to restoring plant habitats and thus diversity and seeing animal populations recover and hopefully thrive. See Section 6.3 Sensitive Natural Communities of the Biological Assessment for more details (Attachment 2).

Procedures for the Protection of the Environment:

Acting as the lead agency, VCRCD will oversee that avoidance and mitigation measures are taken for protection to the environment during project activities. The Program Area is known to host nine listed wildlife species and eight sensitive natural communities and has designated critical habitat for four wildlife species. Specific measures will be put in place to incorporate protection for the variety of species anticipated in the program area. See the Biological Assessment (Attachment 2) and list of measures that are anticipated to be provided in project permits by USACE, RWQCB, USFWS, NOAA, and CDFW (Attachment 3).

Below are examples of pertinent Avoidance and Minimization Measures (AMMs) to minimize or avoid adverse impacts to biological resources but are not a complete list. Please see Attachments 2 and 3 for a full list:

1. Crews will stay within the Project site boundaries (delineated prior to work activities) under direction of the program's on-site biological monitor and work within daylight hours.
2. Pre-construction surveys for sensitive species (i.e., California red-legged frog, southwestern pond turtle, two-striped garter snake, etc.) shall be conducted by a qualified biologist within 5 days prior to beginning work in that species habitat. Nesting birds will also be included in the pre-construction surveys, except for Phase I activities, which will avoid the nesting bird season all together (February 15 to September 15) due to the large amount of biomass being removed.
3. A full time qualified biological monitor will be on site during work activities for plant removal/herbicide treatments and mechanized equipment. The biologist will ensure the crew stays within the work area boundary, avoid incidental impacts to native species (plant and wildlife), and to document work conditions (areas of plant removal, before and after work area photos, etc.).
4. A Workers Environmental Awareness Program (WEAP) will be provided to all new personnel conducted by a qualified biologist or restoration specialist. The WEAP will inform personnel of biological resources on site, identification, potential presence, legal protections/AMMs, and any other applicable information. A pamphlet will be developed to have on site for all contractors that should be referenced and updated as needed for the duration of the project.
5. Vegetation removal shall be restricted to periods of dry weather and will not be conducted when rain is forecasted with a 50% or more probability of occurring in the work area within 12 hours, or if rain has occurred within 24 hours in the work area.
6. Crews will limit foot traffic and/or equipment ingress/egress locations to access Project site.
7. Crews will avoid cutting native shrubs, herbs, or grasses to the greatest extent possible, and no native trees will be removed for project activities. If tree trimming must occur for site access, no branches greater than 2 inch in diameter will be removed per the Ventura County Tree Protection Ordinance.
8. Crews will work outside of the nesting bird season for Phase I (initial vegetation removal) activities (February 15 to September 15).
9. For Phases II, III, and IV, any project activities conducted during nesting bird season will require a pre-construction nesting bird survey by a qualified biologist 2-5 days before project activities begin. If nests are found, a standard 500-foot no-work buffer for raptors and a 250-foot no-work buffer for all other species will be applied unless CDFW approves a change proposed by the qualified biologist or program manager. A 500-foot no-work buffer will be applied to all listed species such as LBVI, SWFL, or YBCU, unless approved by CDFW and USFWS.
10. Invasive vegetation removal within the edges of the wetted channel will occur by foot only, and timing would occur from June 1 to November 30 to avoid impacts to southern CA steelhead. If invasive vegetation removal requires crossing of a wetted channel to remove vegetation, a temporary board or plank may be used to limit impacts to water quality and to avoid degradation/erosion of the streambank. The temporary crossing would also limit plant debris from being dropped into the water.
11. No mechanized equipment will enter wetted channels.
12. All equipment maintenance and materials storage will be kept in designated staging areas at least 100 feet from water. This will also be the location of any herbicide mixing, chainsaw or other hand tool refueling, and any chemical storage. Chemicals will be stored in appropriate containers and machinery stored in staging

areas will have drip pans or absorbent mats as a precautionary measure. Spill kits will be kept on site.

All refuse, biomass, debris, unused materials, and other supplies will be removed from the work area daily and disposed of properly at staging areas, then hauled off site. This includes food trash (peels and seed casings) which will not be left in work areas to avoid attracting wildlife.

Ongoing Management for the Protection of the Environment:

The Ventura River Watershed Riparian Resilience Program is designed to limit impacts to existing natural habitat and native vegetation as the project activities of invasive plant removal and native revegetation occur. The goal of this program is to restore the watershed in its entirety, and have a positive long-term effect on climate resilience, sensitive species, and biodiversity, as well as several incidental public benefits. OVLC and the VCRCD are committed to setting a positive example to the community by protecting the watershed as they implement this program to restore it. VRW is home to several local collaborative groups invested in the long-term maintenance and management of these areas, including the Ventura River Watershed Council (administered by VCRCD), the Ventura County-Ventura River Weed Management Area, and the Matilija Dam Ecosystem Restoration Project – OVLC and VCRCD will collaborate with these partners to ensure program efforts are sustainable and resilient in the long-term. Funding for ongoing management of these sites will be sought through existing, diverse funding sources including CalFire, the State Coastal Conservancy, and the Wildlife Conservation Board, among others, which have provided consistent funding in the past.

The Program is designed strategically to begin at the upper extent of Arundo infestations on Lion Creek, San Antonio Creek, and the Ventura River, and work downstream in phases to target its rhizomatous spread; this is paired with watershed-wide Early Detection-Rapid Response as a long-term strategy to manage the watershed and ensure restoration is successful. OVLC and VCRCD are committed to long-term management of the VRW by using the Early Detection Rapid Response (EDRR) Phase IV of this program for the life of these entities, with broad support for watershed-wide monitoring and EDRR anticipated from entities such as the California Department of Fish and Wildlife, Ventura County agencies, Ventura County Fire Department, City of Ventura, the Ventura County Weed Management Area Group, and others. The 2015 Ventura River Watershed Management Plan describes the need for an Arundo-free watershed plus a healthier San Antonio Creek, and lists both OVLC and VCRCD as entities actively supporting this management plan. OVLC and VCRCD have supported Arundo removal and restoring the VRW riparian habitat in the past and will continue to do so in the future by partnering with other stakeholders to ensure long-term management of the VRW. EDRR may require additional permitting in the future if it is beyond the 10-year program described in this document, and the entities will not proceed without agency approval and proper permitting.

Beyond the life of this program (~10-years) OVLC and VCRCD are committed to ensuring the project's success. Long-term management of Arundo in the VRW will require the vigilance of not just these entities, but the riparian landowners that are committed to seeing this project be successful and are a huge component of this project. They are the eyes of the watershed that will be firsthand accounting Arundo resprouts. OVLC plants to develop a reporting system for the duration of the program to report infestations. This reporting system will extend beyond the life of the program because the program is majorly private property and the knowledge of what is happening on the ground in the VRW will rely on these landowners.

D. The Project does not include any construction activities, except for construction activities solely related to habitat restoration.
The Ventura County Resource Conservation District has determined that the program does not include any construction activities, except for construction activities solely related to habitat restoration.
Please provide an explanation supporting the above determination. Please cite and attach any supporting documents.
This program does not include any construction activities. Attachment 1: Work Plan Attachment 2: Biological Assessment Attachment 3: Avoidance and Minimization measures by agency that are anticipated to be provided in that agency's permits. Measures provided by: **https://tool.acceleratingrestoration.org/**

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.

Jamie Whiteford

Lead Agency Signature

Jamie Whiteford, Executive Director

Date: January 10, 2025

Block E. Supplemental Documentation

USE REQUIREMENTS FOR
VENTURA RIVER WATERSHED RIPARIAN RESILIENCE PROGRAMMATIC PERMITS

State Clearinghouse No. TBD
USFWS/NOAA BO No. TBD
USACE 404 No. TBD
LARWQCB File No. TBD
CDFW Streambed Alteration Agreement No. TBD

To use the Ventura River Watershed Riparian Resilience Programmatic Permits, each applicant SHALL submit the following:

Project Description

1. Location Information:
    a. Description and map of project location (work area boundaries, staging locations, access routes).
    b. Longitude and latitude coordinates of the project boundaries (or UT coordinates).
2. Location and method of disposal of cut vegetation.
3. List of invasive plant species targeted for removal, native plant species to be avoided, and native plant species to be removed, if any (not preferred). No native tree removal permitted.
4. If restoration is proposed, include list of native species and source of plants.
5. List of proposed removal method(s) to be utilized from the program's work plan.
6. List of the proposed avoidance and minimization measures (AMMs) to be implemented, based on work plan and project permits.
7. Schedule for the proposed activities including any subsequent treatment of the specific reach and monitoring of the removal site to ensure the target species have been eradicated.
8. If available, any cultural resource survey or reports for the proposed exotic plant removal area.
9. Confirm that a biologist will be on site to monitor work activities and to meet reporting requirements to agencies as described in project permits. Name, address, phone number, qualifications, and email of biologist shall be submitted prior to initiation of invasive plant removal.
10. Describe any planned post-restoration maintenance or monitoring activities as stated in the program's work plan. If maintenance or monitoring activities differ from work plan methodologies, immediate consultation with VCRCD shall occur to

determine if a project amendment is required.

Project Funds

1. Confirmed project costs including planning, design, oversight, monitoring, reporting and removal activities.
2. Source of funds to pay for future reporting, monitoring and potential revegetation.

Roles and Responsibilities of Parties

The RCD will:

1. Provide copies of each of the permits to the Applicant.
2. Interface with the regulatory agencies on behalf of the Applicant.
    a. This includes submittal of project notification prior to beginning work to the permitting agencies (CDFW, USACE, USFWS & RWQCB); agencies can propose additional measures/changes in writing prior to beginning projects
    b. Submittal of biologist and archeologist (if applicable) resumes/information

The Applicant will:

1. Adhere to all BMPs and AMMs described in the Program Work Plan, in compliance with CDFW Statutory Exemption for Restoration Projects
2. Comply with the US Fish & Wildlife Service and National Oceanic and Atmospheric Administration's Biological Opinions
3. Comply with USACE Permit
4. Comply with CDFW Agreement
5. Comply with LARWQCB Permit
6. Meet all permitting requirements including, but not limited to annual reporting, monitoring, revegetation, and mitigation related to the use of these permits
7. Obtain any additional necessary permits & submit copies thereof
8. Provide biologist and archeologist qualifications (if applicable)
9. Provide proof of insurance
10.

Application Acknowledgement

Sign and date this acknowledgement of Programmatic Permit Use Requirements and include with the Project Application VCRCD.

_____ _____

Project Proponent Signature Date