



2565 Puesta Del Sol Road #3
Santa Barbara, CA 93105
(805) 682-2065
www.storrerenvironmental.com

Jay Dobrowalski
Associate Planner
City of Oxnard
214 South C Street
Oxnard, California 93030

August 3, 2018

Re: Peer Review of “Biological Resources Inventory, 34-acre Project Site, City of Oxnard, Ventura County, California” (Rincon Consultants 2018)

Mr. Dobrowalski:

As requested, Storrer Environmental Services (SES) completed a review of the referenced document (Report). The Report presents the results of a biological survey of a 34-acre property within the jurisdiction of the City of Oxnard (Site). The Report was prepared by Rincon Consultants, Inc. for the Oxnard Harbor District.

Please consider the following comments.

The investigative method included both field reconnaissance and background review.

The field survey was conducted at the appropriate time of year (April) for detecting the majority of annual flowering plant species. The area subject to survey included the entire property plus a 100-foot “buffer” from the Site perimeter. This is sufficient to enable a characterization of biological resources and make reasonable determinations of potential for plant and animal species of special concern to be present.

Background review consisted of a query of the California Natural Diversity Data Base. Other sources included the Biogeographic Information and Observation System, United States Fish and Wildlife Service Critical Habitat Portal, and National Wetland Inventory (NWI) Mapper.

The NWI depicts a 0.2-acre pond within the Site boundaries described as “...a semi-permanently flooded pond created by an excavation”. No indication of this feature (e.g. surface water, evidence of hydrology, hydrophytic vegetation) was found during the field reconnaissance. This may have been an agricultural impoundment that has since been removed.

The Report describes the Site as having limited habitat value as a result of prior agricultural use. The predominance of vegetation consists of non-native grasses and forbs, which is typical of land subject to regular and long-term cultivation. The conclusion that no special status plant species are likely to occur is well-founded.

The “Oxnard Industrial Drain” parallels the southeast corner of the Site. This channel is described as

supporting hydrophytic vegetation and despite its disparaging name, undoubtedly has retained some ecological function. Examination of Google Earth imagery indicates that it discharges into a small coastal estuary about 0.60 miles southwest of the Site. Further, the drainage bisects the undeveloped property immediately south of the Site that is owned by The Nature Conservancy (TNC). The adjoining upland habitat on the TNC property appears not to have been subject to agricultural or other intensive land use. This general characterization is also made from examination of Google Earth imagery – the TNC property was not included in the survey or Report.

At the time the Report was prepared there was apparently no specific project or development plan under consideration. Thus, the Report contains no impact analysis. There are general recommendations intended to avoid impacts to nesting birds and to conduct a preconstruction survey for special status bird species, in particular burrowing owl and horned lark. The Report also suggests that Best Management Practices (BMPs) would be required for construction and operation of any future land development as part of a Storm Water Pollution Prevention Plan (SWPPP).

The report also acknowledges that any modifications to the Oxnard Industrial Drain could require regulatory permits. Since the Site slopes to the south, it seems likely that drainage would have to be engineered to direct runoff to the Oxnard Industrial Drain. Features that would require intrusion into the drainage (e.g. storm water discharge structures) would likely fall within jurisdictional boundaries of the California Department of Fish and Game and (possibly) U.S. Army Corps of Engineers.

In summary, the Report provides an adequate description of the biological resources on the 34-acre property. General recommendations to avoid or minimize impacts to these resources from future site development are reasonable. A more specific analysis of potential project related impact should be completed in consideration of the proposed vehicle storage facility. Possible indirect impacts to the adjacent TNC property and Oxnard Industrial Drain should be evaluated.

Reference

Rincon Consultants, Inc. 2018. Biological Resources Inventory, 34-acre Project Site, City of Oxnard, Ventura County, California. Letter report addressed to G. Pettifor, Oxnard Harbor District. April 27.

Please call me if you have any questions concerning my comments and recommendations.

Sincerely,



John Storrer
Storrer Environmental Services, LLC

cc: Lisa Plowman, RRM Design