

## DOCKETED

<b>Docket Number:</b>	15-AFC-02
<b>Project Title:</b>	Mission Rock Energy Center
<b>TN #:</b>	210983
<b>Document Title:</b>	Memorandum - Comments on Request for Agency Participation in the Review of the Application for Certification
<b>Description:</b>	N/A
<b>Filer:</b>	Cenne Jackson
<b>Organization:</b>	County of Ventura - Resource Management Agency - Planning Division
<b>Submitter Role:</b>	Public Agency
<b>Submission Date:</b>	4/8/2016 9:41:45 AM
<b>Docketed Date:</b>	4/8/2016



# Memorandum

County of Ventura • Resource Management Agency • Planning Division  
800 S. Victoria Avenue, Ventura, CA 93009-1740 • (805) 654-2478 • [ventura.org/rma/planning](http://ventura.org/rma/planning)

**DATE:** April 1, 2016

**TO:** Laura Hocking, Ventura County Planning Division

**FROM:** Whitney Wilkinson, Ventura County Planning Division

**SUBJECT:** Request for Agency Participation in the Review of the Mission Rock Energy Center Application for Certification

---

I have reviewed the California Energy Commission's Request for Agency Participation for the Mission Rock Energy Center Application for Certification (collectively, "AFC"). The proposed project is located in the unincorporated area of Ventura County. The following comments are intended to help define the scope of the AFC with respect to potential biological impacts and provide recommended mitigation measures.

**1. Ventura County Initial Study Assessment Guidelines:** The potential project impacts should be evaluated in accordance with Ventura County's adopted California Environmental Quality Act (CEQA) environmental thresholds of significance. The County's CEQA environmental thresholds of significance are set forth in the *Ventura County Initial Study Assessment Guidelines* (April 26, 2011) (ISAGs), which are available online at:

[http://www.ventura.org/rma/planning/pdf/ceqa/current\\_ISAG.pdf](http://www.ventura.org/rma/planning/pdf/ceqa/current_ISAG.pdf).

The AFC and appendices should include all of the information that is required pursuant to the "Ventura County Planning Division Standards for Initial Study Biological Assessments" (October 9, 2012) (ISBA), which is available online at:

<http://www.ventura.org/rma/planning/conservation/bio-report-procedure.html>.

**2. Ventura County General Plan:** The AFC should analyze the proposed project with respect to its consistency with the Ventura County General Plan *Goals, Policies and Programs* (GPP) (2011) environmental goals and policies for biological resources. Several policies in the GPP support the protection of, and require an evaluation and mitigation of significant impacts to, biological resources as follows:

- a. Wildlife migration corridors, threatened or rare species and their habitats, and locally important species/communities are considered to be significant biological resources that should be preserved and protected from incompatible land uses

and development (GPP Goal 1.5.1). Ventura County's wildlife corridors include the river corridors of its three major river and creek systems as well as the landscape scale habitat linkages mapped by the South Coast Missing Linkages Project.

- b. Biological resource policies include wetland protection policies, such as a 100 foot setback from significant wetland habitat for all discretionary development (GPP Policy 1.5.2-4) and a requirement to evaluate biological impacts for discretionary projects within 300 feet of waters and wetlands (GPP Policy 1.5.2-3).
- c. The AFC should discuss the proposed project's consistency with the GPP policies in terms of the proposed project's impacts' intensity, type, context, and duration. Mitigation measures should be developed that avoid significant impacts to biological resources (e.g., wetland habitat). Also, please be aware that the GPP states that certain unavoidably significant impacts to biological resources (e.g., impacts to wetland habitat) cannot be found acceptable with the adoption of a Statement of Overriding Considerations; projects that result in such impacts shall be prohibited.
- d. Resource agencies and subject matter experts, including the California Department of Fish and Wildlife, U.S Fish and Wildlife Service, National Audubon Society, and California Native Plant Society, should be consulted during preparation of the AFC (GPP Policy 1.5.2-5).

**3. Ventura County Locally Important Species and Communities:** The AFC should include an analysis of Ventura County Locally Important Species, or consider them "special status species." Impacts to Ventura County Locally Important Species must be evaluated and mapped. For a complete listing of Locally Important Species, please see the following link:

<http://www.ventura.org/rma/planning/conservation/locally-important-species.html>.

Impacts to Locally Important Communities (e.g., oak woodlands and California black walnut woodland) should be acknowledged in the AFC. The AFC should evaluate direct and indirect (i.e., dust) impacts to Locally Important Communities.

Thank you for the opportunity to comment and participate in the review of the AFC. If you have questions regarding the information set forth in this memo, please contact Whitney Wilkinson at 805-654-2462 or [whitney.wilkinson@ventura.org](mailto:whitney.wilkinson@ventura.org).