



**DRAFT**  
**ENVIRONMENTAL IMPACT REPORT**  
**FOR THE**  
**CALLEGUAS REGIONAL SALINITY MANAGEMENT PROJECT**  
**PHASE 2 (UPPER REACH)**

Prepared for:

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January 2014

Project No. 1102-1921

## TABLE OF CONTENTS

| Section  | Page |
|--|------|
| 1.0 INTRODUCTION.....  | 1-1  |
| 1.1 Purpose and Legal Authority .....                                      | 1-1  |
| 1.2 Project Proponent and Lead Agency.....                                 | 1-1  |
| 1.3 Project Location.....  | 1-1  |
| 1.4 Project Background .....   | 1-1  |
| 1.5 Project Objectives .....   | 1-2  |
| 1.6 Scope and Content.....   | 1-3  |
| 1.7 Responsible and Trustee Agencies.....                                  | 1-5  |
| 1.8 Mitigation Monitoring Plan .....                                       | 1-5  |
| 1.9 Project Approvals and Permits .....                                    | 1-6  |
| 1.10 Certification of the Final EIR.....                                   | 1-6  |
| 1.11 Preparers of the Document .....                                       | 1-6  |
| 2.0 SUMMARY .....  | 2-1  |
| 2.1 Project Synopsis.....  | 2-1  |
| 2.2 Areas of Known Controversy.....  | 2-2  |
| 2.3 Summary of Environmental Impacts, Mitigation Measures and Alternatives | 2-2  |
| 3.0 PROJECT DESCRIPTION .....  | 3-1  |
| 3.1 Project Elements .....   | 3-1  |
| 3.2 Construction .....   | 3-2  |
| 3.3 Operation.....   | 3-3  |
| 3.4 Cumulative Projects .....  | 3-3  |
| 4.0 ENVIRONMENTAL IMPACT ANALYSIS .....                                    | 4-1  |
| 4.1 Aesthetics.....  | 4-1  |
| 4.2 Agricultural and Forestry Resources .....                              | 4-2  |
| 4.3 Air Quality.....   | 4-6  |
| 4.4 Biological Resources .....   | 4-13 |
| 4.5 Cultural Resources.....  | 4-20 |
| 4.6 Geology and Soils .....  | 4-27 |
| 4.7 Greenhouse Gas Emissions.....  | 4-29 |

## TABLE OF CONTENTS (CONTINUED)

| <b>Section</b> |  | <b>Page</b> |
|----------------|--|-------------|
| 4.8            | Hazards and Hazardous Materials/Risk of Upset..... | 4-31        |
| 4.9            | Hydrology and Water Quality.....                   | 4-34        |
| 4.10           | Noise .....  | 4-38        |
| 4.11           | Transportation/Circulation .....                   | 4-45        |
| 5.0            | ALTERNATIVES ANALYSIS.....                         | 5-1         |
| 5.1            | No Project Alternative.....                        | 5-2         |
| 5.2            | Alternatives Considered .....                      | 5-2         |
| 5.3            | Impacts of the Alternatives .....                  | 5-2         |
| 5.4            | Environmentally Superior Alternative .....         | 5-7         |
| 6.0            | GROWTH INDUCEMENT .....                            | 6-1         |
| 7.0            | REFERENCES.....                                    | 7-1         |

## APPENDICES

### Appendix

- A Notice of Preparation and Initial Study
- B Responses to the Notice of Preparation
- C Mitigation Monitoring and Reporting Program

## TABLES

| <b>Table</b> |   | <b>Page</b> |
|--------------|---|-------------|
| 1.           | Summary of Significant Unavoidable Adverse Environmental Impacts..... | 2-3         |
| 2.           | Summary of Significant Adverse Environmental Impacts .....            | 2-3         |
| 3.           | Air Quality Summary – El Rio Station .....                            | 4-9         |
| 4.           | Construction-Related Greenhouse Gas Emissions.....                    | 4-30        |
| 5.           | Noise Monitoring Results .....  | 4-39        |
| 6.           | Summary of Residences Affected by Nighttime Construction Noise.....   | 4-44        |
| 7.           | Comparison of the Impacts of the Alternatives .....                   | 5-8         |

## TABLE OF CONTENTS (CONTINUED)

### FIGURES

| <b>Figure</b> |   | <b>Page</b> |
|---------------|---|-------------|
| 1             | Regional Map .....  | 3-5         |
| 2             | Salinity Management Pipeline Phase 2 (Upper Reach) Alignment .....    | 3-6         |
| 3             | Salinity Management Pipeline Phase 2D Alignment-West.....             | 3-7         |
| 4             | Salinity Management Pipeline Phase 2D Alignment-East.....             | 3-8         |
| 5             | Salinity Management Pipeline Phase 2E Alignment-West.....             | 3-9         |
| 6             | Salinity Management Pipeline Phase 2E Alignment-East.....             | 3-10        |
| 7             | Site Photographs.....   | 3-11        |
| 8             | Phase 2D Nighttime Noise Impact Map .....                             | 4-42        |
| 9             | Phase 2E Nighttime Noise Impact Map .....                             | 4-43        |
| 10            | Salinity Management Pipeline Phase 2 (Upper Reach) Alternatives ..... | 5-9         |



## **1.0 INTRODUCTION**

### **1.1 PURPOSE AND LEGAL AUTHORITY**

This Environmental Impact Report (EIR) has been prepared for the Calleguas Regional Salinity Management Pipeline Phase 2 (Upper Reach), which is a part of a larger project, addressed in a Program Environmental Impact Report/Environmental Assessment (Program EIR/EA) certified in 2002. This document is incorporated by reference and provides a basis of the environmental review in this document, including portions of the currently proposed project, alternatives and cumulative analysis. The purpose of this EIR is to address changes in project characteristics and environmental setting not foreseen in the Program EIR/EA.

The subject project would be implemented by the Calleguas Municipal Water District (CMWD), the project proponent. Section 3.0 of this document provides a description of the proposed project. CMWD is also the “lead agency” for the proposed project. As defined by Section 15367 of the State CEQA Guidelines, the lead agency is “the public agency which has the principal responsibility for carrying out or approving a project which may have a significant impact on the environment.”

### **1.2 PROJECT PROPONENT AND LEAD AGENCY**

Calleguas Municipal Water District  
2100 Olsen Road  
Thousand Oaks, California 91360  
  
Contact: Eric Bergh (805) 579-7128

### **1.3 PROJECT LOCATION**

The subject pipeline alignment roughly parallels Somis Road, the Union Pacific Railroad tracks and Los Angeles Avenue, between the cities of Camarillo and Moorpark (see Figures 1 and 2) in central Ventura County. Photographs of the proposed pipeline alignment are provided as Figure 7.

### **1.4 PROJECT BACKGROUND**

The proposed project is a component of the Calleguas Regional Salinity Management Project (CRSMP), which was the subject of a Program EIR/EA, dated August 2, 2002 (SCH no. 2000101104 and EA number 01-LC-007). The CRSMP is located within the Calleguas Creek Watershed (watershed), which faces a number of environmental challenges involving both surface and groundwater resources. One of these environmental issues is the presence of increasing salinity levels within the watershed.

In response to the need to address increasing salinity levels in the watershed, CMWD, working with other public water and wastewater agencies, is undertaking the design and construction of a regional project to manage high salinity water use and disposal. The CRSMP consists of an approximately 32-mile pipeline system that would collect treated wastewater and brine concentrates from wastewater treatment plants, brackish groundwater desalters (both municipal and agricultural), and industrial operations located within the Calleguas Creek watershed, then convey the effluent to other areas for direct use or to an ocean outfall. This is expected to result in substantial improvements in water quality of affected creeks and groundwater supplies. For additional information regarding the CRSMP please refer to the original CMWD – CRSMP Final Program EIR/EA (August, 2002).

The CRSMP pipeline system includes three phases of construction. Phase 1 of the CRSMP included the pipeline from the Camrosa Water Reclamation Facility in southwestern Ventura County to an ocean outfall at Port Hueneme. Phase 1 of the CRSMP was divided into sub-phases 1A through 1E for construction and design purposes. Phase 1E was the subject of an Environmental Impact Report (SCH no. 2007021026) because the selected ocean outfall was not addressed in the Program EIR/EA. Of these sub-phases, Phases 1A, 1B, 1C and 1D were completed by 2009, and Phase 1E was completed in mid-2012.

Phase 2 (Lower Reach) of the CRSMP includes approximately 6.6 miles of pipeline, north from the Camrosa Water Reclamation Facility, generally along Lewis Road, to a point just north of Las Posas Road. Phase 2 (Lower Reach) of the CRSMP was divided into sub-phases 2A through 2C for construction and design purposes. The revised pipeline alignment and other features of Phases 2A, 2B and 2C were addressed in a Mitigated Negative Declaration (SCH no. 2009121083) prepared in 2009. Currently, Phases 2D and 2E (i.e., Upper Reach) are under design and are the subject of this EIR.

The alignment for Phase 3 of the CRSMP has yet to be determined. At this time, two general alignments are under review. One includes an extension of the Phase 2 alignment eastward through the City of Moorpark to an undetermined point within the City of Simi Valley. The other alignment under consideration includes a pipeline from Phase 2C in the City of Camarillo eastward through the Santa Rosa and Tierra Rejada Valleys to an undetermined point within the City of Simi Valley. A preferred alignment for Phase 3 of the CRSMP will be determined following discussions with probable dischargers.

## 1.5 PROJECT OBJECTIVES

The following objectives are taken from the Program EIR/EA prepared for the CRSMP, since Phase 2 (Upper Reach) is a critical component of the overall project.

- Enable both public and private water agencies to develop new water sources that at the present time cannot be widely used due to poor quality;
- Manage the use of high salinity groundwater and treated municipal wastewater; and
- Dispose of brine produced by enhanced water treatment.

## 1.6 SCOPE AND CONTENT

### 1.6.1 Notice of Preparation

Based on an Initial Study prepared for the current project (see Appendix A), an EIR was deemed necessary. A Notice of Preparation (NOP) was prepared for the project and distributed with the Initial Study to responsible and trustee agencies, and potentially affected property owners, and was received by the State Clearinghouse on October 17, 2013. Twelve response letters to the NOP were received (see Appendix B):

**Native American Heritage Commission (NAHC).** Noted that a cultural resources record search and an archeological survey (if needed) are required, and should be documented in a professional report. The NAHC also recommended contacting local Native Americans, and provided a list of contacts. The NAHC requested that mitigation measures be included in the EIR to address accidentally discovered archeological resources, including disposition of discovered artifacts in consultation with culturally affiliated Native Americans.

**California Department of Transportation (Caltrans).** Caltrans expressed concerns about storm water run-off onto State Routes 34 and 118, use of oversized vehicles on State highways, and limiting truck trips to off-peak commute periods. Caltrans noted that a truck/traffic management plan may be needed for project construction.

**Ventura County Watershed Protection District – Water & Environmental Resources Division.** This letter noted that the project would be subject to the State’s General Construction Stormwater Permit, and may be subject to the Ventura Countywide Storm Water Quality Management Program (Order no. R4-2010-0108). The District also noted that the project should consider erosion and sediment control measures in accordance with Order no. R4-2010-0108, and additional control measures may apply for construction on slopes greater than 20 percent or near environmentally sensitive areas.

**Ventura County Public Works Agency – Transportation Department.** The Transportation Department noted that encroachment permits will be required for work within the County road right-of-way, and Caltrans and Southern Pacific Railroad should review the project. The Transportation Department expressed concerns about traffic impacts at Balcom Canyon Road/State Route 118 and Grimes Canyon Road/State Route 118 intersections. The letter indicated that a traffic management plan and traffic control plan should be submitted, and roadways affected by pipeline installation should be repaired according to County policy. The Transportation Department also indicated that a traffic impact mitigation fee should be submitted for construction-related vehicle trips.

**Ventura County Public Works Agency – Integrated Waste Management Division.** This letter requested the project’s specifications include provisions for recycling construction materials, soil and green-waste, and provide a summary of recycling efforts to the Integrated Waste Management Division.

**Ventura County Water and Sanitation Department.** The Department recommended that the Phase 2 (Upper Reach) alignment be extended several hundred feet to Hitch Boulevard.

**State Water Resources Control Board.** This letter noted that environmental issues must be resolved and federal environmental requirements be met prior to receipt of funding through the Clean Water State Revolving Fund.

**Ventura County Watershed Protection District – Planning & Regulatory Division.** This letter noted that pipeline crossings of drainages will require a permit from the Watershed Protection District, and recommended that these crossings should not impede water flow or increase peak flow through storm run-off.

**California Department of Fish & Wildlife.** The Department recommends a complete assessment of potentially affected species, a thorough discussion of biological impacts, protection of nesting birds, bat roosts and listed species, and opposes elimination of natural watercourses.

**Ventura County Air Pollution Control District.** The District recommends the EIR address reactive organic compound, nitrogen oxide and particulate emissions from project-related sources, and include a discussion of impacts related to valley fever.

**Kirton/McConkie Attorneys at Law.** This law firm represents a property owner along the pipeline alignment, and expressed concerns about construction-related impacts to raspberry crops.

**Joe and Linda McGinnis.** The McGinnis' are concerned about project-related conflicts with the existing nursery operation on their property.

### 1.6.2 EIR Scope

Sufficient design work has been completed that the alignment of the western portion (Phase 2D) of the Phase 2 (Upper Reach) CRSMP has been determined and contact with property owners has been initiated. A preliminary alignment of the eastern portion of the Phase 2 (Upper Reach) has been identified, but may change as further design work is completed. This EIR addresses the entire Phase 2 (Upper Reach) alignment; however, future CEQA documentation may be required if the alignment of the eastern portion (Phase 2E) is substantially modified.

This EIR addresses the following issue areas identified in the Initial Study and responses to the Notice of Preparation that warrant further study and analysis:

- Aesthetics;
- Agriculture;
- Air quality;
- Biological resources;
- Cultural resources;
- Geology;
- Greenhouse gas emissions;
- Hazards and hazardous materials;

- Hydrology and water quality;
- Noise; and
- Transportation/Circulation.

Effects not found to be significant are identified in the attached Initial Study. The EIR identifies any significant environmental impacts, and recommends technically feasible mitigation measures, where possible, that would reduce or eliminate significant environmental effects.

The Alternatives Section of the EIR is prepared in accordance with Section 15126.6 of the State CEQA Guidelines. The Alternatives Section examines the relative impacts of the proposed project, the No Project Alternative, and two alternative pipeline alignments. This section also identifies the "environmentally superior" alternative.

The level of detail contained throughout this EIR is consistent with the requirements of CEQA and recent court decisions. The State CEQA Guidelines provide the standard by which the adequacy of this EIR is based. The Guidelines state:

*"An EIR should be prepared with a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure." [emphasis added] (Section 15151).*

## 1.7 RESPONSIBLE AND TRUSTEE AGENCIES

The *State CEQA Guidelines* define "lead", "responsible", and "trustee" agencies. CMWD, as a public agency, has the principal responsibility for carrying out and approving the proposed project. Therefore, CMWD is the lead agency. As defined in Section 15381 of the State CEQA Guidelines, responsible agencies are State public agencies which have discretionary approval power over the project. Responsible agencies for the proposed project may include the California Department of Fish and Wildlife and Regional Water Quality Control Board (Los Angeles Region).

Trustee agencies refer to agencies having jurisdiction by law over the natural resources affected by a project. Based upon this definition, the California Department of Fish and Wildlife and U.S. Fish and Wildlife Service, which have jurisdiction over biological resources that may be impacted by the proposed project, are trustee agencies.

## **1.8 MITIGATION MONITORING PLAN**

Pursuant to California Resources Code Section 21081.6, a Mitigation Monitoring Plan will be developed to ensure the implementation of mitigation measures necessary to reduce or eliminate identified significant impacts. The Plan, if one is necessary, will be adopted by the CMWD Board of Directors in conjunction with the findings required under CEQA, when the Board certifies the EIR and approves the project.

## **1.9 PROJECT APPROVALS AND PERMITS**

Project implementation may require CMWD to obtain permits and/or other forms of approval or regulatory review from Federal, State and local agencies. These agencies may include, but are not limited to, the following:

### **1.9.1 Federal Agencies**

- Army Corps of Engineers - Clean Water Act Section 404 permit.
- U.S. Fish and Wildlife Service - Section 7 Consultation under the Endangered Species Act.
- National Marine Fisheries Service - Section 7 Consultation under the Endangered Species Act.

### **1.9.2 State Agencies**

- Department of Transportation – Encroachment Permit.
- Department of Fish and Wildlife - Streambed Alteration Agreement.
- Regional Water Quality Control Board - National Pollution Discharge Elimination System (NPDES) General Construction Stormwater Permit; and Clean Water Act Section 401 Water Quality Certification.

### **1.9.3 Local Agencies**

- Ventura County Public Works Agency – Roadway Encroachment Permit.
- Ventura County Watershed Protection District – Watercourse Permit.

## **1.10 CERTIFICATION OF THE FINAL EIR**

The Draft EIR will be circulated for review by public agencies and interested members of the public for a minimum 45-day period. CMWD will prepare responses to all comments on the adequacy of the Draft EIR received during this period. The Final EIR will be comprised of the Draft EIR, comments and responses to comments received during circulation of the Draft, and technical appendices. At the time the project is approved, the mandated CEQA Findings and a Mitigation Monitoring Plan will be adopted. CMWD is the lead agency for the EIR and has the responsibility of determining the adequacy of the EIR pursuant to CEQA.

## **1.11 PREPARERS OF THE DOCUMENT**

This document was prepared for the CMWD by Matt Ingamells, Kristin Hart and Suzun Rasmusson of Padre Associates, Inc.

## 2.0 SUMMARY

This section has been prepared in accordance with the CEQA Guidelines, and is divided into two components. The first summarizes the characteristics of the proposed project, and the second identifies environmental impacts, mitigation measures, and residual impacts.

### 2.1 PROJECT SYNOPSIS

#### 2.1.1 Project Proponent

Calleguas Municipal Water District  
2100 Olsen Road  
Thousand Oaks, California 91360

Contact: Eric Bergh (805) 579-7128

#### 2.1.2 Project Objectives

The following objectives are taken from the Program EIR/EA prepared for the CRSMP, since Phase 2 (Upper Reach) is a critical component of the overall project.

- Enable both public and private water agencies to develop new water sources that at the present time cannot be widely used due to poor quality;
- Manage the use of high salinity groundwater and treated municipal wastewater, and
- Dispose of brine produced by enhanced water treatment.

#### 2.1.3 Project Description

The currently proposed Phase 2 (Upper Reach) pipeline includes approximately 28,800 feet (5.5 miles) of 24 inch diameter pipe, located primarily within agricultural fields on private property, mostly outside the public right-of-way of Somis Road and Los Angeles Avenue. The Phase 2 (Upper Reach) alignment has been divided into two sub-phases (2D and 2E) for the purposes of engineering design and construction. Phase 2D begins just north of Somis Road, approximately 400 feet east of the Las Posas Road/Somis Road intersection, at the northern terminus of Phase 2C. Phase 2D extends along the north side of Somis Road and the Union Pacific Railroad tracks, approximately 12,840 feet, and ends about 450 feet southeast of the Route 118 crossing (see Figures 3 and 4). Phase 2E would cross to the north side of Route 118 and traverse agricultural lands eastward to near Hitch Boulevard (see Figures 5 and 6).

The 24-inch Phase 2 (Upper Reach) pipeline would be constructed of one or a combination of materials including polyvinyl chloride and high density polyethylene, typically delivered and installed in 20 to 50-foot-long sections. Construction would be primarily limited to normal working hours 8 to 10 hours per day, between the hours of 7 a.m. and 7 p.m., Monday through Friday, with occasional work on Saturday. However, evening or night work may be required for installation of trench-less (tunneled) pipeline crossings, and in areas where traffic conditions require non-traditional working hours. It is anticipated that typical pipeline installation rates would be approximately 80 to 200 feet per day.

Operation of Phase 2 (Upper Reach) of the CRSMP pipeline system would be limited to inspection, exercising valves, and painting.

#### 2.1.4 Alternatives Considered

Three alternatives to the proposed project were considered (see Section 5).

- No Project;
- Alternative A alignment: similar to the preferred alignment, but would follow Somis Road, instead of the Union Pacific Railroad tracks to Los Angeles Avenue; and
- Alternative B alignment: would generally follow the north bank of Arroyo Las Posas, except a central portion that would follow the Union Pacific Railroad tracks (see Figure 10).

## 2.2 AREAS OF KNOWN CONTROVERSY

CMWD is unaware of any controversy regarding the project.

## 2.3 SUMMARY OF ENVIRONMENTAL IMPACTS, MITIGATION MEASURES AND ALTERNATIVES

### 2.3.1 Environmental Impacts and Mitigation Measures

Potential project impacts were categorized according to the following classifications:

**Significant, Unavoidable, Adverse Impacts.** These are impacts for which specific economic, social or other considerations make infeasible the mitigation measures or project alternatives identified in the EIR. Should the CMWD Board of Directors decide to approve the project, a Statement of Overriding Considerations must be adopted for any significant unavoidable adverse impact. Significant unavoidable impacts are summarized in Table 1.

**Significant, Adverse Impacts.** These are significant impacts that can be feasibly mitigated to less than significant levels. Significant impacts are summarized in Table 2.

**Less than Significant Adverse Impacts.** These are environmental impacts that are considered adverse, but are less than identified significance thresholds.

**Table 1. Summary of Significant Unavoidable Adverse Environmental Impacts**

| <u>DESCRIPTION OF IMPACT</u>  | <u>MITIGATION MEASURES</u>  |
|---|---|
| <b>4.10 NOISE</b>   |   |
| Trench-less pipeline installation under drainages and roadways may require evening and/or nighttime work, which would generate noise levels exceeding the nighttime noise threshold criteria at nearby residences. As shown in Table 6, incorporated noise reduction measures would substantially reduce the number of residences affected by construction noise levels above the nighttime threshold. However, approximately 25 residences would experience nighttime noise levels above the threshold, even with incorporation of noise reduction measures. Therefore, nighttime construction noise is considered a significant unavoidable impact. | All feasible construction noise reduction measures have been incorporated into the project. Therefore, additional measures are not available to further reduce nighttime noise impacts. |

**Table 2. Summary of Significant Adverse Impacts**

| <u>DESCRIPTION OF IMPACT</u>  | <u>MITIGATION MEASURES</u>   |
|---|--|
| <b>4.4 BIOLOGICAL RESOURCES</b>   |  |
| Take (direct mortality, loss of active nests) of raptors and other birds protected under the California Fish and Wildlife Code and Federal Migratory Bird Treaty Act may occur as a result of removal of tree windrows, other vegetation near drainage crossings and trench-less pipeline installation activities adjacent to larger drainages. In particular, red-tailed hawks are likely to breed in Fox Barranca and Coyote Canyon and may be adversely affected by pipeline installation. Impacts to breeding birds are considered potentially significant. | The following measure is taken from the Program EIR/EA to reduce potential take of raptors and migratory birds:<br><br>Breeding bird surveys shall be conducted by CMWD in May and June prior to the initiation of construction at all proposed creek crossings and pipeline segments adjacent to creeks or other native vegetation. Surveys shall include all suitable habitat within 500 feet of identified impact areas. No heavy equipment shall be operated within 200 feet of any active nest of migratory bird species. |

**Table 2. Continued**

**DESCRIPTION OF IMPACT**

**MITIGATION MEASURES**

**4.5 CULTURAL RESOURCES**

Prehistoric archeological site CA-VEN-631 is located immediately adjacent to the Phase 2D alignment. However, the northern boundary of this site is undetermined, and buried portions of this site could extend into the Phase 2D APE. Therefore, pipeline installation activities may result in disturbance of this site. Prehistoric archeological site CA-VEN-1089 is located in close proximity to the eastern end of the Phase 2D APE, and buried portions of this site could extend into the Phase 2D APE. Project-related disturbance of archeological sites may result in the loss of artifacts and/or loss of stratigraphic integrity. Therefore, impacts are considered potentially significant.

The following measures are provided to avoid or minimize any potentially significant impacts to buried prehistoric cultural resources along the Phase 2D alignment.

1. A qualified archeologist shall conduct an Extended Phase 1 subsurface excavation using shovel test pits to determine the presence or absence of cultural deposits within the Phase 2D APE that borders Site CA-VEN-631. A Chumash representative shall be retained to monitor the Extended Phase 1 excavation of this site.
2. A qualified archeologist shall conduct an Extended Phase subsurface testing program at Site CA-VEN-1089. Prior to testing, additional background research should be undertaken regarding previous subsurface investigations. The findings of the background research shall be used to determine the extent and method of the Extended Phase 1. A Chumash representative shall be retained to monitor the Extended Phase 1 excavation of this site.
3. Prior to initiation of pipeline installation activities, an archaeologist shall provide all workers associated with earth-disturbing activities an orientation regarding the probability of exposing cultural resources and directions as to what steps are to be taken if a find is encountered.
4. In the event that archaeological resources are exposed during project construction, all earth disturbing work within the vicinity of the find must be temporarily suspended until a qualified archaeologist has evaluated the nature and significance of the find. The CMWD shall be notified of any such find. A Chumash representative shall monitor any archaeological field work associated with Native American materials.
5. If human remains are unearthed, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the Native American Heritage Commission. The CMWD shall also be notified of any such find.

**Table 2. Continued**

**DESCRIPTION OF IMPACT**

**MITIGATION MEASURES**

**4.5 CULTURAL RESOURCES (CONTINUED)**

The currently proposed Phase 2E pipeline alignment is parallel to State Route 118 (Los Angeles Avenue) and located about 50 feet north of the right-of-way. Prehistoric archeological site CA-VEN-228 is located in close proximity to the eastern end of the Phase 2E alignment, and pipeline installation activities may result in disturbance of this site. Project-related disturbance of archeological sites may result in the loss of artifacts and/or loss of stratigraphic integrity. Therefore, impacts are considered potentially significant.

The following measures are provided to avoid or minimize any potentially significant impacts to buried prehistoric cultural resources along the Phase 2E alignment.

1. A qualified archeologist shall conduct a Phase 1 archaeological survey of the Phase 2E pipeline alignment prior to finalization of the alignment.
2. If feasible, the Phase 2E alignment should be modified as needed to avoid potential impacts to Site CA-VEN-228 and any other resources identified during the archeological survey. If the CMWD determines that modification of the Phase 2E alignment is not feasible, a qualified archeologist shall conduct an Extended Phase 1 subsurface excavation using shovel test pits to determine the presence or absence of cultural deposits within the pipeline alignment that would affect Site CA-VEN-228. A Chumash representative shall be retained to monitor the Extended Phase 1 excavation of this site.
3. Prior to initiation of pipeline installation activities, an archaeologist shall provide all workers associated with earth-disturbing activities an orientation regarding the probability of exposing cultural resources and directions as to what steps are to be taken if a find is encountered.
4. In the event that archaeological resources are exposed during project construction, all earth disturbing work within the vicinity of the find must be temporarily suspended until a qualified archaeologist has evaluated the nature and significance of the find. The CMWD shall be notified of any such find. A Chumash representative should monitor any archaeological field work associated with Native American materials.
5. If human remains are unearthed, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the Native American Heritage Commission. The CMWD shall also be notified of any such find.

**4.11 TRANSPORTATION**

During the construction period, the project may contribute at least one peak hour trip to the SR 118/SR 34 intersection, which currently operates at unacceptable LOS. This impact is considered potentially significant.

The intent of the mitigation measure is to offset the project-related contribution to existing traffic congestion.

- CMWD shall pay Traffic Impact Mitigation fees to the Ventura County Transportation Department based on the projected number of average daily trips and the rates (\$/trip) in effect at the time construction is implemented. These fees would be used for roadway improvements to offset the contribution of the project to level of service impacts.

### 2.3.2 Alternatives

Alternative alignments A and B are considered feasible and would meet all of the overall CRSMP objectives. However, Alternative B would be more costly to construct and maintain due to its greater length, and has a higher potential for storm damage due to its location adjacent to Arroyo Las Posas.

Section 15126.6(e)(2) of the State CEQA Guidelines requires identification of the environmentally superior alternative. Table 7 provides a summary of the relative impacts of the alternative pipeline alignments. The No Project Alternative would avoid direct impacts, but may adversely affect municipal water supplies augmented by treated groundwater, as it would severely limit brine disposal options. In addition, the No Project Alternative would prevent the achievement of the objectives of the CRSMP in the upper watershed, including enabling development of new water sources, management of high salinity groundwater, and disposal of brine.

The impacts associated with the preferred alignment would be lower in magnitude than the alternative alignments. Therefore, the preferred alignment is the environmentally superior alternative.

## 3.0 PROJECT DESCRIPTION

### 3.1 PROJECT ELEMENTS

Phase 2 (Upper Reach) of the CRSMP pipeline system represents pipeline segment C-D (less about one mile between Adolfo Road and Las Posas Road, and about 2,500 feet further east of Grimes Canyon) as detailed in the 2002 Program EIR/EA. The Phase 2 (Upper Reach) pipeline alignment extends along Somis Road and the Union Pacific Railroad tracks, from approximately 400 feet east of the Somis Road/Las Posas Road intersection to approximately 1,000 feet east of the Los Angeles Avenue/Grimes Canyon Road intersection (see Figure 2). This alignment is very similar to the Alternative A alignment addressed in the Program EIR/EA, except the currently proposed pipeline alignment would cross agricultural land instead of following Somis Road to Los Angeles Avenue (see Figure 2). The currently proposed alignment is about 0.2 miles shorter than the Alternative A alignment addressed in the 2002 Program EIR/EA.

Characteristics of the currently proposed Phase 2 (Upper Reach) pipeline include:

- Approximately 28,800 feet long (5.5 miles);
- 24 inches in diameter;
- The pipeline alignment is located primarily within agricultural fields on private property, mostly outside the public right-of-way of Somis Road and Los Angeles Avenue;
- The pipeline would cross up to five public roadways (Somis Road, Los Angeles Avenue, Sand Canyon Road, Balcom Canyon Road and Grimes Canyon Road); and
- The pipeline would cross nine intermittent drainages (Groves Place Drain, Fox Barranca, Coyote Canyon, unnamed agricultural drain, Sand Canyon, Mahan Barranca, Long Canyon, Hunt Wash, Grimes Canyon).

The Phase 2 (Upper Reach) alignment has been divided into two sub-phases (2D and 2E) for the purposes of engineering design and construction. Phase 2D begins just north of Somis Road, approximately 400 feet east of the Las Posas Road/Somis Road intersection, at the northern terminus of Phase 2C. Phase 2D extends along the north side of Somis Road and the Union Pacific Railroad tracks, approximately 12,840 feet, and ends about 450 feet southeast of the Route 118 crossing (see Figures 3 and 4). Phase 2E would cross to the north side of Route 118 and traverse agricultural lands eastward to near Hitch Boulevard (see Figures 5 and 6).

**It is important to note that sufficient engineering design has not been completed for Phase 2E to identify a precise pipeline alignment. Therefore, the pipeline alignment shown in Figures 5 and 6, and described above, represents an environmental assessment corridor, to allow for minor changes in the alignment to avoid utilities, levees, roadways and other structures. However, the actual width of disturbance would generally be less than 75 feet.**

### 3.2 CONSTRUCTION

The 24-inch Phase 2 (Upper Reach) pipeline would be constructed of one or a combination of materials including polyvinyl chloride and high density polyethylene, typically delivered and installed in 20 to 50-foot-long sections.

Construction would be primarily limited to normal working hours 8 to 10 hours per day, between the hours of 7 a.m. and 7 p.m., Monday through Friday, with occasional work on Saturday. However, evening or night work may be required for installation of trench-less (tunneled) pipeline crossings, and in areas where traffic conditions require non-traditional working hours. It is anticipated that typical pipeline installation rates would be approximately 80 to 200 feet per day.

Installation of Phase 2 (Upper Reach) would be restricted to the rights-of-way approved by the applicable landowner or agency. Generally, pipeline installation would occur within a 55 foot-wide corridor, consisting of a 30 foot-wide temporary construction easement and a 25 foot-wide permanent easement. However, the temporary easement would be larger in areas where trench-less methods would be used to cross under drainages or roadways. All roadways disturbed during pipeline installation would be restored following construction. Generally, trench spoils would be temporarily stockpiled within the construction easement, then backfilled to the trench after pipeline installation or hauled away to a disposal site.

Based upon an installation rate of approximately 80 to 200 feet per day, the average amount of excess spoils requiring removal would be approximately 100 to 200 cubic yards per day. This would require approximately 10 to 20 truck trips per day per construction crew. The average daily number of trucks hauling material to and from a typical construction crew (including the delivery of pipe sections, miscellaneous supplies, hauling of imported sand and removal of excess spoils) would be approximately 35 truck round trips per day.

Staging would be dependent upon the contractor and subcontractors. Typically, pipe material would be brought to the site ahead of construction and staged along the alignment. Equipment and other construction materials may require a storage site. If the contractor is local, they may stage equipment and materials in their own yard. Alternately, and in the case of contractors from outside of the area, staging would likely be accomplished at strategic locations on leased land or within permitted areas along selected alignments of the pipeline.

Pipeline installation at creek crossings would primarily be conducted using trench-less methods, such as horizontal directional drilling, boring and jacking, micro-tunneling or similar methods. Typical crossings would involve the construction of pits on each side of the crossing, and a machine is used to bore a horizontal hole under the structure, road, or creek, then a steel casing is inserted into the hole, or the pipeline is directly inserted into the hole. If a pipe casing is used, pipeline segments would be installed into the casing and connected to the in-place segments of pipeline on either side of the crossing.

Based on engineering design work completed to date, it is anticipated that the pipeline would be installed under the streambed using trench-less methods at all drainages, including Groves Place Drain, Fox Barranca, Coyote Canyon, unnamed agricultural drain east of Coyote Canyon, Sand Canyon drainage, Mahan Barranca, Long Canyon, Hunt Wash and Grimes Canyon. Pipeline crossings at roadways (possibly excluding Sand Canyon Road) would also be conducted using trench-less methods.

### **3.3 OPERATION**

Activities associated with operation of Phase 2 (Upper Reach) of the CRSMP pipeline system would be limited to inspection, exercising valves, and painting.

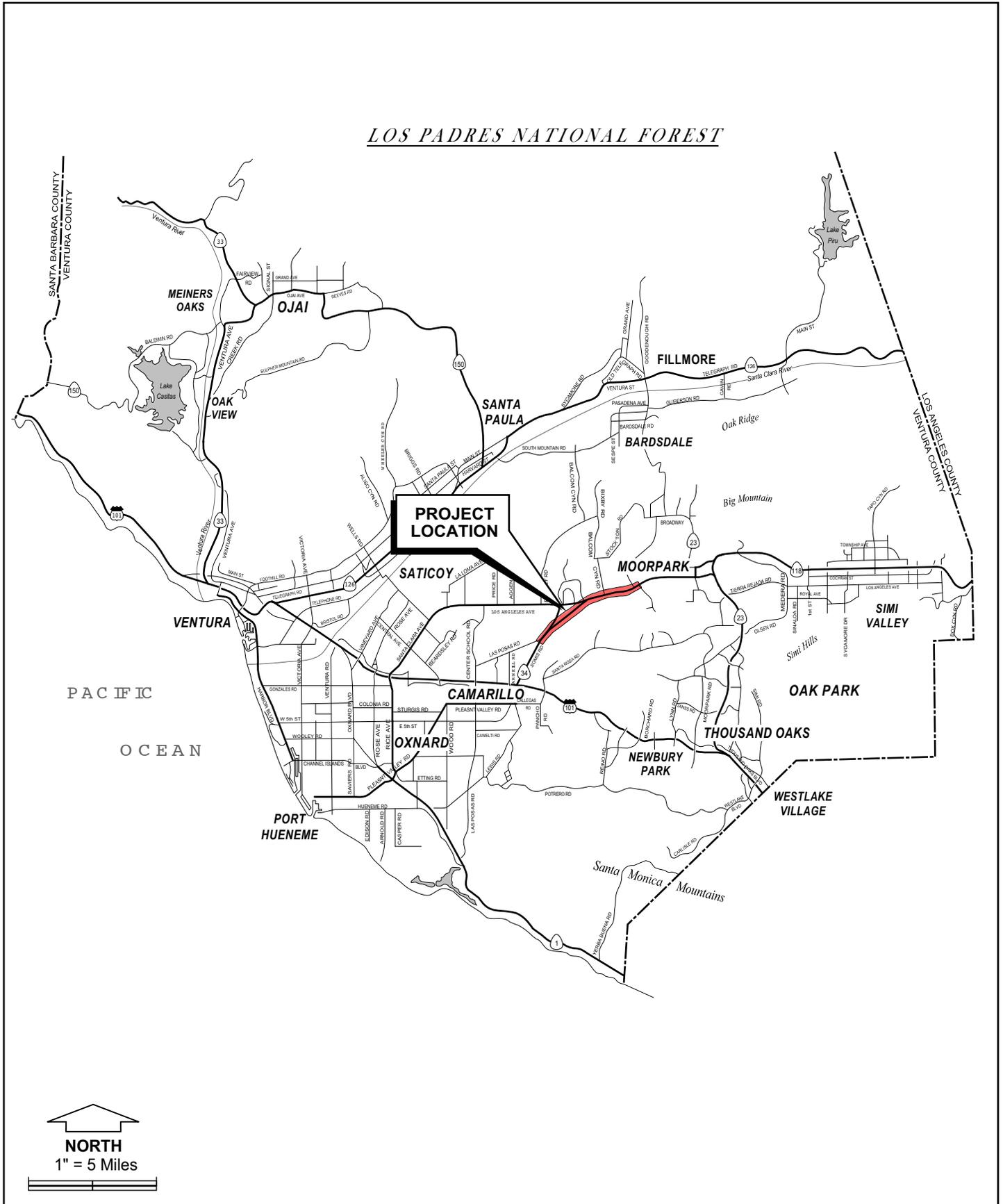
### **3.4 CUMULATIVE PROJECTS**

Cumulative impacts are defined as two or more individual effects which, when considered together, are considerable, or which compound or increase other environmental impacts. Under Section 15064 of the State CEQA Guidelines, the lead agency (CMWD) must identify cumulative impacts, determine their significance and determine if the effects of the project are cumulatively considerable.

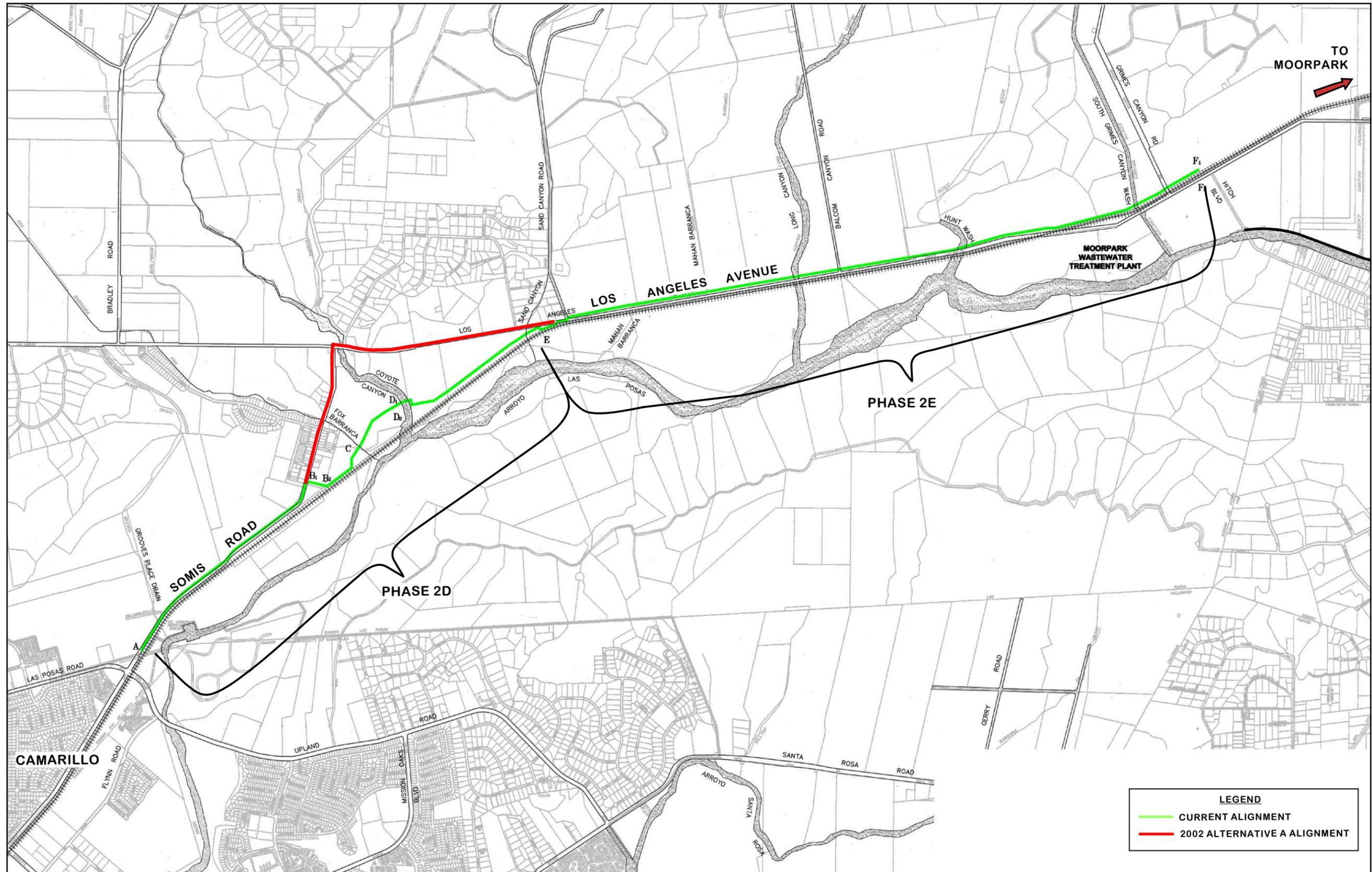
The following list of other approved and pending projects was taken from the Ventura County Planning Division website, and is dated October 1, 2013. Generally, only projects within 5 miles of the proposed pipeline alignment were included. Two other projects proposed to be annexed from Ventura County into the City of Camarillo were also included, due to their proximity to the pipeline alignment.

- Permit extension for an unmanned communication facility near Silver Crest Street, south of Moorpark – approved;
- County-initiated non-renewal of a Land Conservation Act contract near Balcom Canyon – pending;
- Variance to exceed maximum lot coverage at the Balcom Canyon Pet Lodge – pending;
- Office addition at 3100 Somis Road – pending;
- 20-year time extension for agricultural accessory structures 3165 Subida Circle – pending;
- Legalization of an existing veterinarian hospital at 5375 Bell Street, Somis – pending;
- Parcel merger and zone change near Donlon Road, Somis area – pending;
- 20-year time extension for a farmworker dwelling at 6500 Meadowglade Drive, near Moorpark – pending;
- Request for approval of agricultural promotional uses and outdoor festivals at 10700 Broadway Road, near Moorpark – pending;

- 20-year time extension for an agricultural facility at 4799 Donlon Road, near Somis – pending;
- 10-year time extension for outdoor festivals and other events at 10350 Santa Rosa Road – pending;
- Modification to an existing unmanned communication facility at 3046 Ventavo Road, near Moorpark – pending;
- Four lot residential subdivision at 6497 La Cumbre Road, near Somis – pending;
- Lot line adjustment near Rocky High Road, near Thousand Oaks – pending;
- 2 lot residential subdivision at 6167 Greentree Drive, northwest of Somis – pending;
- 15 lot subdivision at Yucca Drive, Santa Rosa Valley – pending;
- New school (Camarillo Academy High School) near the northwest corner of the Las Posas Road/Somis Road intersection (requires annexation into the City of Camarillo) – approved; and
- North Pleasant Valley Groundwater Treatment Plant to be located just north of the proposed Camarillo Academy High School (requires annexation into the City of Camarillo) – pending.







SOURCE: Perliter & Ingalsbe - 2010













a. Phase 2D alignment along Somis Road



b. Phase 2D alignment along Somis Road, in Somis



c. Phase 2E alignment, Los Angeles Ave @ Balcom Canyon Rd



d. Phase 2E alignment, Los Angeles Ave @ Grimes Canyon Rd

## 4.0 IMPACT ANALYSIS

### 4.1 AESTHETICS

#### 4.1.1 Setting

##### 4.1.1.1 Existing Visual Resources

The proposed pipeline alignment is primarily located in agricultural areas (row crops, orchards and some greenhouses) near roadways (see Figure 7). Tree windrows in the area provide visual variety in contrast to croplands. The 2002 Program EIR/EA assessed this alignment (Segment C-D: Alternative A) and determined the scenic variety as common, moderate to high visual sensitivity and moderate visual condition (other land uses compete with the dominant agricultural character). No designated scenic resource areas occur in the project area. The Phase 2E pipeline alignment is located just north of Los Angeles Avenue (State Route 118), which is considered an eligible County scenic highway (Ventura County Planning Division, 2011).

##### 4.1.1.2 Significance Thresholds

The evaluation of the project's aesthetic impacts is based upon a review of the project plans, area maps, aerial photographs, and site reconnaissance. For the purposes of this analysis, a significant adverse aesthetic impact would occur if the project would result in a substantial deterioration of the scenic variety or visual condition of an area with a high to moderate level of visual sensitivity or cause the obstruction of scenic views.

#### 4.1.2 Impact Analysis

##### 4.1.2.1 Project-Specific Impacts

**Scenic Vistas.** Excluding air vents and manholes, the project would not involve any above-ground structures, and would not result in any changes to areas within scenic resource protection areas. In addition, the proposed pipeline alignment is not visible from any scenic vistas.

**Scenic Resources and Highways.** The entire Phase 2E pipeline alignment is visible from Los Angeles Avenue, an eligible County scenic highway. Pipeline installation would require the temporary removal of several rows of orchard trees in some areas, and possibly some landscaping trees on properties along the alignment. However, the orchards would remain intact, with a net temporary effect of a perceived wider roadway shoulder. Orchard trees would be replaced within temporary construction easements following pipeline installation. Tree removal at drainage crossings would be minimized by trench-less pipe installation under the drainage. No historic buildings or rock outcroppings would be affected. Overall, project-related tree removal would not substantially degrade the scenic variety or visual condition of motorist views from Los Angeles Avenue, and is considered a less than significant impact.

**Visual Character and Quality.** Excluding air vents and manholes, the project would not involve any above-ground structures, and would not adversely affect the visual character or quality of the area. Pipeline installation would involve temporary vegetation removal, mostly within agricultural areas, where crop rotation is common. Following pipeline installation, crops would be replaced along the disturbance corridor, with virtually no long-term change in vegetation or visual character. The proposed project would not involve cut slopes or other features incompatible with the existing visual character of the area. Impacts to visual quality and character would be less than significant.

**Lighting and Glare.** Excluding air vents and manholes, the project would not involve any above-ground structures, and would not include lighting or glare-producing features.

#### 4.1.2.2 Cumulative Impacts

A four lot residential subdivision (6497 La Cumbre Road) is planned along Los Angeles Avenue and would result in the replacement of orchards with four residences. This change would slightly alter the visual character and quality of motorist views along this eligible County scenic highway. The proposed project would incrementally contribute (on a temporary basis) to the cumulative aesthetic impact. The cumulative aesthetics impact is anticipated to be less than significant, and the contribution of the project would not be cumulatively considerable.

#### 4.1.3 Mitigation Measures

The project would not result in significant impacts related to aesthetics; therefore, mitigation measures are not necessary.

#### 4.1.4 Consistency with 2002 Program EIR/EA

The proposed pipeline alignment modification (Phase 2 - Upper Reach) would not result in any new aesthetic impacts, or modify the severity of previously identified impacts. Overall, no significant impacts to scenic highways or visual quality would occur. Therefore, the findings of this analysis are consistent with the Program EIR/EA for Segment C-D of the CRSMP.

### 4.2 AGRICULTURAL AND FORESTRY RESOURCES

#### 4.2.1 Setting

##### 4.2.1.1 Existing Resources

**Ventura County Crop Sales.** The County's agriculture gross dollar sales in 2012 were estimated at \$1.96 billion. Approximately 100,000 acres in the southern portion of Ventura County are devoted to agricultural production. Ventura County agriculture focuses on production of citrus, cut flowers and nursery products as well as vegetables and field crops. Agriculture is the leading industry in the County.

The Ventura County Agricultural Commissioner's Annual Crop Report for 2012 indicates strawberries are the leading single commodity with a value of \$691 million. The most valuable crop group is fruits and nuts with a year 2012 value of \$1.255 billion.

**Soils.** Based on the local soil survey (Edwards, et al., 1970), the Phase 2 (Upper Reach) pipeline alignment traverses Sorrento silty clay loam (0-2 percent slopes, 2-9 percent slopes), Salinas clay loam (0-2 percent slopes), Pico sandy loam (0-2 percent slopes), Sorrento loam (0-2 percent slopes, 2-9 percent slopes) and Mocho loam (0-2 percent slopes). Each of these soil series are considered candidates for listing as Prime Farmland or Farmland of Statewide Importance.

**Important Farmlands.** The Farmland Mapping and Monitoring Program operated by the California Department of Conservation has classified farmland as "Prime," "Statewide Importance," "Unique" and "Local Importance". The basis for this classification is primarily the Soil Survey, Ventura Area, California (Edwards et al., 1970). "Prime" farmlands are defined as farmland with the best combination of physical and chemical features able to sustain long-term production of agricultural crops. This land has the soil quality, growing season, and moisture supply needed to produce sustained high yields. Land must have been used for production of irrigated crops at some time during the four years prior to the most recent mapping date (2010).

"Farmlands of Statewide Importance" are lands similar to "Prime" but with minor shortcomings, such as greater slopes or less soil moisture-holding capacity. Land must have been used for production of irrigated crops at some time during the four years prior to the most recent mapping date (2010).

"Unique Farmlands" are other lands of lesser quality soils used for production of the State's leading agricultural crops. This land is usually irrigated, but may include non-irrigated orchards or vineyards. Land must have been used for production of crops at some time during the four years prior to the most recent mapping date (2010).

Approximately 84 percent of the proposed Upper Reach pipeline alignment would traverse Prime Farmland, Farmland of Statewide Importance and Unique Farmland. Agricultural uses along the Phase 2 (Upper Reach) pipeline alignment include row crops, orchards (mostly citrus) and hoop-houses (temporary greenhouses constructed of plastic covered metal hoops, used to grow berries).

The affected parcels (proposed pipeline alignment) are zoned Agricultural-Exclusive, 40 acre minimum parcel size (AE-40 ac). However, one parcel (APN 110-0-240-10) located immediately west of the Los Angeles Avenue/Sand Canyon Road intersection is zoned RE-1 ac (rural exclusive) and may be affected by pipeline installation. The purpose of the AE zone is to preserve and protect commercial agricultural lands as a limited and irreplaceable resource. The purpose of the RE zone is to provide for and maintain rural residential areas in conjunction with horticultural activities.

**Forest Land.** The nearest forest land (as defined in Public Resources Code Section 12220) or timberland is located within the Los Padres National Forest, at least 11 miles north of the proposed pipeline alignment.

#### 4.2.1.2 Significance Thresholds

For the purposes of this project, the CMWD has adopted the following significance thresholds developed by Ventura County (2011). Loss of agricultural soils on the project site is considered a significant project-specific impact if any of the following thresholds are equaled or exceeded.

|                            |          |
|----------------------------|----------|
| Prime/Statewide importance | 5 acres  |
| Unique                     | 10 acres |
| Locally important          | 15 acres |

A non-agricultural project would have a potentially significant land use incompatibility impact if it would be located within 300 feet (without vegetative screening) of classified farmland (Prime/Statewide, Unique, Local Importance). This buffer distance may be waived for projects where individuals are not continuously present, such as the proposed project.

A project that would require a General Plan amendment and result in a loss of agricultural soils greater than indicated above is considered as having a substantial contribution to a significant cumulative impact.

#### 4.2.2 Impact Analysis

##### 4.2.2.1 Project-Specific Impacts

**Farmland Conversion.** Based on a 55 foot-wide pipeline installation disturbance corridor, approximately 19.2 acres of prime farmland, 9.5 acres of farmland of state-wide importance and 3.2 acres of unique farmland would be disturbed. These values are less than estimated for the original Segment C-D alignment in the 2002 Program EIR/EA, primarily because the width of the assumed disturbance corridor has been reduced from 75 feet to 55 feet. Temporary pipeline construction easements and permanent pipeline operations easements within agricultural areas would be returned to agricultural uses following pipeline installation. Therefore, the proposed project would not result in the conversion of farmland to non-agricultural use.

**Agricultural Zoning.** The proposed pipelines would be fully buried and not conflict with the existing agricultural exclusive zoning, or Williamson Act contracts. The project is consistent with existing zoning of the affected parcels (AE-40 ac, RE-1 ac).

**Forest Land Zoning/Conversion.** The project would not result in the loss or conversion of forest land to non-forest uses, or cause any forest land or timberlands to be rezoned.

**Indirect Conversion to Non-Agricultural Use.** Projects that involve public infrastructure (roads, power, water, sewer, etc.) in a previously undeveloped area may lead to inducement of population growth and associated conversion of agricultural lands.

The proposed project would serve as part of a regional pipeline system to dispose of brine and other treated wastewater, which would facilitate development of the proposed South Las Posas Basin Desalter and proposed West Simi Desalter. These facilities would make poor quality groundwater available for potable and agricultural uses. Therefore, the proposed project would facilitate increases in water available for irrigation of crops. In addition, the CRSMP would improve the quality and reliability of agricultural water supplies by a long-term reduction in total dissolved solids of groundwater used for irrigation. The potential project-related increases in the availability and quality of groundwater for agriculture are considered beneficial impacts. Indirect conversion of farmland is not anticipated.

**Loss of Agricultural Production.** Pipeline installation would temporarily displace agricultural crops and may reduce access to other crops due to open trenches. However, displacement of crops would be limited to a 55-foot-wide construction corridor over a period of a few months (at each location), potentially including 13.4 acres of row crops, 1.5 acres of nurseries, 8.6 acres of orchards and 1.9 acres of hoop-houses (berries). Short-rotation row crops could be planted soon after construction is complete, minimizing loss of production. Nursery stock could be moved prior to pipeline installation to minimize losses.

Citrus orchards represent a long-term investment and removal of trees would be required to accommodate pipe installation, and reduced access for maintenance and irrigation may occur during construction. Berries are planted every three years and require installation and maintenance of hoop-houses. Installation of the Phase 2E pipeline may require removal and replacement of approximately 1.9 acres of hoop-houses and berry crops, and may result in reduced access for maintenance and irrigation during construction. Development of a precise pipeline alignment would include considerations to minimize crop losses, and the value of lost production and cost of replacing orchard trees and hoop-houses would be considered during negotiations for right-of-way acquisition.

Access requirements would be resolved as part of acquisition of temporary construction easements, such that trenches would be closed as needed to allow nearly continuous access to all cultivated areas along the pipeline alignment. Loss of productivity is not considered substantial because areas affected would be relatively small and the duration of effects would be short. Although individual farmers may experience socioeconomic effects associated with lost production, these effects are not considered environmental impacts to be addressed under CEQA (Section 15131 of the State CEQA Guidelines). Overall, no permanent loss of farmland would occur. Therefore, loss of production impacts to agricultural resources would be less than significant.

#### 4.2.2.2 Cumulative Impacts

Three of the cumulative projects (four lot subdivision at La Cumbre Road, Camarillo Academy High School, North Pleasant Valley Groundwater Treatment Plant) would involve a total conversion of approximately 36 acres of Prime Farmland, Farmland of Statewide Importance or Unique Farmland. The cumulative farmland conversion would be a significant impact. However, the proposed project would not incrementally contribute to this cumulative impact.

These cumulative projects (including the Phase 2 Upper Reach) would also involve some loss of agricultural production due to construction activities. However, this cumulative impact is considered less than significant due to the small area affected, short duration, and reduced loss of production associated with short-rotation crops.

#### **4.2.3 Mitigation Measures**

The project would not result in significant impacts to agricultural or forestry resources. Therefore, no mitigation is required.

#### **4.2.4 Consistency with 2002 Program EIR/EA**

The proposed pipeline alignment modification (Phase 2 - Upper Reach) would not result in any new agricultural impacts, or modify the severity of previously identified impacts. Overall, no long-term impacts to agricultural lands or operations would occur. Therefore, the findings of this analysis are consistent with the Program EIR/EA for Segment C-D of the CRSMP.

### **4.3 AIR QUALITY**

#### **4.3.1 Setting**

##### **4.3.1.1 Existing Conditions**

The project site is located in the Oxnard Plain Airshed, a sub-basin of the South Central Coast Air Basin. The Airshed is characterized by cool winters and warm, dry summers tempered by cooling sea breezes. Summer, spring and fall weather is generally a result of the movement and intensity of the semi-permanent high pressure area located several hundred miles to the west. Marine influences generally predominate during this period and cause afternoon onshore flow and evening off-shore flow. Winter weather is generally a result of the size and location of low pressure weather systems originating in the north Pacific Ocean.

The topography and climate of Southern California combine to make the Air Basin an area of high air pollution potential. In Ventura County, ozone generally reaches peak levels by mid-afternoon and, along with ozone precursors, is often blown inland by the prevailing winds. Thus, inland areas such as Simi Valley, Thousand Oaks, Ojai, Fillmore, and Piru often have higher ozone levels and the most days over the federal and state ozone standards than the County's coastal areas. The highest ozone concentrations tend to occur from May through October (smog season) when high temperatures and stable atmospheric conditions produce conditions conducive to ozone formation and accumulation.

**Criteria Air Pollutants.** The primary chemical compounds that are considered pollutants emitted into or formed in the atmosphere include ozone, oxides of nitrogen, sulfur dioxide, hydrocarbons, carbon monoxide, and particulate matter.

Ozone ( $O_3$ ) is formed in the atmosphere through a complex series of chemical reactions generally requiring light as an energy source. Ozone is a pungent, colorless gas that is a strong irritant and attacks the respiratory system. Respiratory and cardiovascular diseases are aggravated by exposure to ozone. A healthy person exposed to high concentrations of ozone may experience nausea, dizziness, and burning in the chest. Ozone also damages crops and other vegetation.

Oxides of nitrogen ( $NO_x$ ) which are considered criteria air pollutants include nitric oxide (NO) and nitrogen dioxide ( $NO_2$ ). NO is colorless and odorless and is generally formed by combustion processes combining atmospheric oxygen and nitrogen.  $NO_2$  is a reddish-brown irritating gas formed by the combination of NO and oxygen in the atmosphere or at the emission source. Both NO and  $NO_2$  are considered ozone precursors because they react with hydrocarbons and oxygen to produce ozone. Exposure to  $NO_2$  may increase the potential for respiratory infections in children and cause difficulty in breathing even among healthy persons and especially among asthmatics.

Sulfur dioxide ( $SO_2$ ) is a colorless, pungent, irritating gas which affects the upper respiratory tract. Sulfur dioxide may combine with particulate matter and settle in the lungs, causing damage to lung tissues. Sulfur dioxide may combine with water in the atmosphere to form sulfuric acid that may fall as acid rain, damaging vegetation.

Hydrocarbons include a wide variety of compounds containing hydrogen and carbon. Many hydrocarbons (known as reactive organic gases [ROG]) react with NO and  $NO_2$  to form ozone. Generally, ambient hydrocarbon concentrations do not cause adverse health effects directly, but result in ozone formation.

Carbon monoxide (CO) is a colorless, odorless gas generally formed by incomplete combustion of hydrocarbon-containing fuels. Carbon monoxide does not irritate the respiratory tract, but does interfere with the ability of blood to carry oxygen to vital tissues.

Particulate matter consists of a wide variety of particle sizes and composition. Generally, particles less than 10 microns ( $PM_{10}$ ) are considered to be pollutants because they accumulate in the lung tissues and may contain toxic materials which can be absorbed into the system.

**Regulatory Setting.** The Federal Clean Air Act (CAA, as amended in 1990) is the federal law that governs air quality, including setting standards for the allowable concentrations of air pollutants. At the federal level, these standards are called National Ambient Air Quality Standards (NAAQS). The U.S. Environmental Protection Agency (EPA) has developed two sets of standards; one to provide an adequate margin of safety to protect human health and the second to protect the public welfare from any known or anticipated adverse effects. Standards have been established for six criteria pollutants that have been linked to potential health concerns; the criteria pollutants are CO,  $NO_2$ ,  $O_3$ , inhalable PM, lead, and  $SO_2$ . Ventura County is classified as a serious non-attainment area for the Federal 8-hour ozone standard, meaning ambient air monitoring data indicates this standard is periodically exceeded.

The California Air Resources Board (CARB) is responsible for implementing the requirements of the Federal CAA, regulating emissions from motor vehicles and consumer products, and implementing the California Clean Air Act of 1988 (CCAA). The CCAA outlines a program to attain the State standards for O<sub>3</sub>, NO<sub>2</sub>, SO<sub>2</sub>, and CO by the earliest practical date. Since the State standards are generally more stringent than the Federal standards, attainment of the State standards may require more emission reductions than required to attain Federal standards.

Similar to the Federal system, the state requirements and compliance dates are based on the severity of the ambient air quality standard violation within a region. Ventura County has been classified as a non-attainment area for the State 1-hour ozone standard, State 24-hour PM<sub>10</sub> standard and the State 24-hour PM<sub>2.5</sub> standard.

**Air Quality Management Plan (AQMP).** The Federal CAA established clean air plan requirements for areas that exceed the NAAQS. These areas, called nonattainment areas, must develop and implement clean air plans to attain the NAAQS by specified dates. Clean air plans are also called nonattainment plans or state implementation plans. Each state is responsible for implementing the Federal CAA within its jurisdiction. California state law designates the CARB as California's agency for all purposes set forth in the Federal CAA, including preparation of the California State Implementation Plan for ozone.

In July 1997, EPA promulgated an 8-hour NAAQS for ozone. Based on Ventura County's ozone levels over the previous three years, EPA designated Ventura County a moderate nonattainment area for the 8-hour ozone standard on June 15, 2004. Moderate ozone nonattainment areas must attain the federal 8-hour ozone standard by June 15, 2010. On February 14, 2008, CARB formally requested that EPA reclassify (bump up) Ventura County up one classification level to a serious 8-hour ozone nonattainment area. This means that Ventura County must meet the federal 8-hour ozone standard by June 15, 2013. Although Ventura County will have more time to attain the 8-hour standard, the serious classification requires Ventura County to meet the requirements for that higher classification, many of which are more stringent than for moderate areas. Accordingly, in anticipation of becoming a serious area, the 2007 AQMP was prepared to satisfy the Federal CAA planning requirements for that classification. Currently, Ventura County is still classified as non-attainment for the federal 8-hour ozone standard.

Building on previous Ventura County AQMPs, the 2007 AQMP presents a combined local and state clean air strategy based on concurrent ROG and NO<sub>x</sub> emission reductions to bring Ventura County into attainment of the federal 8-hour ozone standard. ROG and NO<sub>x</sub> emitted by both anthropogenic and natural sources react in the atmosphere to produce photochemical smog, of which ozone is the principal constituent. Ventura County was the first area in the nation to institute such a strategy for meeting ozone standards. The local strategy includes the 1994 AQMP clean air strategy plus several new and further study emission control measures.

Photochemical modeling results documented in the 2007 AQMP indicate Ventura County will meet the Federal 8-hour ozone standard by 2013, the attainment date for serious ozone nonattainment areas.

The air quality of Ventura County is monitored by a network of six stations, operated by CARB and the Ventura County Air Pollution Control District (APCD). The El Rio ambient air monitoring station is located approximately eight miles west of the proposed pipeline alignment, and is the most representative of the area affected by the project.

Table 3 lists the monitored maximum concentrations and number of violations of ozone air quality standards at the El Rio station for the years 2010 through 2012. As shown in Table 3, 1-hour ozone concentrations monitored at the El Rio station did not exceed the State standard from 2010 through 2012. The State 8-hour ozone standard was only exceeded on one day during 2010 through 2012.

**Table 3. Air Quality Summary – El Rio Station**

| Parameter  | Standard  | Year  |       |       |
|--|-----------|-------|-------|-------|
|  |           | 2010  | 2011  | 2012  |
| <b>Ozone (O<sub>3</sub>) – parts per million</b>     |           |       |       |       |
| Maximum 1-hour concentration monitored (ppm)         |           | 0.083 | 0.081 | 0.082 |
| Number of days exceeding State standard              | 0.09 ppm  | 0     | 0     | 0     |
| Maximum 8-hour concentration monitored (ppm)         |           | 0.073 | 0.069 | 0.065 |
| Number of days exceeding Federal 8-hour standard     | 0.075 ppm | 0     | 0     | 0     |
| Number of days exceeding State 8-hour standard       | 0.070 ppm | 1     | 0     | 0     |
| <b>PM<sub>2.5</sub> – micrograms per cubic meter</b> |           |       |       |       |
| Maximum value  |           | 21.4  | 18.3  | 30.8  |
| Number of sampling days above Federal standard       | 35        | 0     | 0     | 0     |
| <b>PM<sub>10</sub> – micrograms per cubic meter</b>  |           |       |       |       |
| Maximum value  |           | 61.5  | 51.7  | 56.9  |
| Number of sampling days above State standard         | 50        | 1     | 1     | 1     |
| Number of sampling days above Federal standard       | 150       | 0     | 0     | 0     |

**Valley Fever.** Valley fever (*Coccidioidomycosis*) is a disease contracted by the inhalation of airborne spores of a fungus (*Coccidioides immitis*). Since these spores typically become airborne through soil disturbance as a component of fugitive dust, this health hazard is addressed as an air quality phenomenon. The name "valley fever" reflects the fact that the first cases reported in the United States were from the Central Valley of California. Since it was first discovered in 1893, more than half of the cases reported in California have come from the southern portion of the Central Valley (Kern, Kings, Tulare and Fresno Counties).

Most of the population living for extended periods in infected areas is exposed to valley fever. However, most exposed individuals do not become infected and only one person per 1000 infected develops serious illness. Newcomers to infected areas are more likely to develop serious illness than those exposed as children. Persons with consistent exposure to valley fever such as farm workers and construction workers are more susceptible to serious complications. The symptoms of the disease vary from none to very severe, sometimes fatal illness. Statistically, 60 percent of those infected show no symptoms and 40 percent exhibit flu-like symptoms typical of the disease. Most people who become infected have an excellent chance for full recovery if the illness is correctly diagnosed.

Reported cases of valley fever tend to increase in dry periods following exceptionally wet years. The Ventura County Public Health Department reported less than 10 cases during the drought (pre-1992), but 60 cases were reported in 1992, possibly the result of high rainfall during the 1991-1992 rain year. However, the origin of infection is difficult to trace because the symptoms may not be apparent for years after exposure. It is thought that many cases reported in Ventura County are a result of previous exposure in Kern County.

Valley fever cases in Ventura County ranged from 10 to 91 per year from 2001 through 2012, with an infection rate (per 100,000 individuals) ranging from 1.3 to 10.9 (California Department of Public Health, 2011 & 2013). As a comparison, reported valley fever cases in Ventura County peaked at 243 in 1994, presumably linked to airborne dust generated by the Northridge earthquake (Ventura County APCD, 2003).

#### 4.3.1.2 Significance Thresholds

The APCD has prepared Air Quality Assessment Guidelines (2003) for the preparation of air quality impact analyses. The Guidelines indicate that a project would have a significant impact on the environment if it would:

- Result in daily emissions exceeding 25 pounds of reactive organic compounds (ROC) or oxides of nitrogen (NO<sub>x</sub>);
- Cause a violation or make a substantial contribution to a violation of an ambient air quality standard;
- Directly or indirectly cause the existing population to exceed the population forecasts in the most recently adopted AQMP; and
- Be inconsistent with the Ventura County AQMP and emit greater than 2 pounds per day ROC or NO<sub>x</sub>.

## 4.3.2 Impact Analysis

### 4.3.2.1 Project-Specific Impacts

**AQMP Consistency.** Projects that cause local populations to exceed population forecasts in the Ventura County AQMP are considered inconsistent with the AQMP, as exceeding population forecasts can result in the generation of emissions beyond those which have been projected in the AQMP. As discussed in the 2002 Program EIR/EA, the CRSMP has the potential to be growth-inducing by facilitating the treatment and use of poor quality groundwater for potable uses. However, if project-related growth did occur, the AQMP population forecasts are not anticipated to be exceeded because actual population growth in the project area has been less than assumed in the AQMP.

**Violation of Air Quality Standards.** State 1-hour ambient standards for CO are sometimes exceeded at roadway intersections during times of peak traffic congestion. These localized areas are sometimes called CO “hotspots”. Due to the relatively low ambient CO levels associated with low emissions vehicles and mandated use of oxygenated fuels, CO hotspots rarely occur in the region. However, the proposed project is located adjacent to the SR 34/SR 118 intersection, which handles high volumes and is highly congested at peak hour. The project would generate only small amounts of traffic, and only during the construction period, and would not substantially contribute to a violation of the CO standard.

Fugitive dust would be generated by the operation of heavy equipment and off-road use of motor vehicles during pipeline installation. Dust generation from these activities would be considered a significant impact if APCD Rule 51 is violated. Rule 51 states “A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or the public or which endangers the comfort, repose, health or safety of any such persons or the public or which cause or have a natural tendency to cause injury or damage to business or property.” Mitigation measures have been incorporated into the overall CRSMP as discussed in the Program EIR/EA and would ensure fugitive dust impacts are reduced to a less than significant level.

**Criteria Pollutant Emissions Increase - Construction.** Emissions would be generated during the construction phase by heavy equipment, heavy-duty trucks and construction worker passenger vehicles. This analysis is based on a peak construction day, consisting of micro-tunneling (12 hours per day of pilot hole drilling) at a creek crossing and trenching at another location along the alignment. Equipment assumed to be operating during a peak construction day includes a tracked micro-tunneling machine, one excavator, one crane, one roller, one wheeled loader, and a generator (to run mud pumps, mud shaker, lighting). Construction equipment exhaust emissions were calculated using load factors and emission factors from Nonroad Engine and Vehicle Emissions Study (EPA, 1991).

Peak day construction emissions would be 223.5 pounds NO<sub>x</sub> and 23.3 pounds ROC. As such, NO<sub>x</sub> and ROC emissions during peak construction periods would exceed the 25 pounds per day threshold established by the APCD. However, due to the temporary, short-term nature of construction emissions, the APCD does not apply the quantitative emissions thresholds for ROC and NO<sub>x</sub> to construction activities. The APCD does require that emission reduction measures be implemented during construction to reduce exhaust emissions and fugitive dust generation. As documented in the Program EIR/EA, air emissions reduction measures recommended by the Ventura County APCD would be fully implemented including:

- Removal of vegetation and ground disturbance shall be limited to the minimum area necessary to complete project construction activities. Vegetative cover shall be maintained on all other portions of the project area.
- Regular ground wetting of exposed soils and sediments, and unpaved access roads shall be conducted during construction to control fugitive dust emissions.
- Grading activities shall cease during periods of high winds (greater than 20 miles per hour, averaged over one hour).
- Silt containing material excavated, stockpiled or transported during construction shall be wetted regularly.
- On-site construction vehicle speed shall be limited to 15 miles per hour in unpaved areas.
- Trucks transporting backfill material to the project site shall be covered or maintain a minimum two-foot freeboard.
- Roadways in the vicinity of construction access points shall be swept as necessary to prevent the accumulation of silt.
- Minimize truck idling time.
- Maintain engines in good condition and proper tune.

**Criteria Pollutant Emissions Increase – Operation.** Long-term operation of the proposed project would be limited to infrequent inspection and maintenance, which would generate one motor vehicle round trip per week (one trip on a peak day). Peak day operation emissions would be 0.02 pounds NO<sub>x</sub> and 0.01 pounds ROC. As such, NO<sub>x</sub> and ROC emissions would not exceed the 25 pounds per day threshold established by the APCD, and considered less than significant.

**Odors.** The community of Somis and several rural residences are located in proximity of the Phase 2 (Upper Reach) alignment, and diesel exhaust odors from construction equipment may be considered objectionable. However, these odors would only occur for a short period at any one location (a few weeks), and would not affect a substantial number of people. In addition, the alignment is located adjacent to roadways carrying substantial diesel truck traffic and railroad tracks carrying diesel-electric trains, such that residents would be acclimated to diesel exhaust odors. Therefore, odor impacts are considered less than significant.

**Valley Fever.** Portions of the pipeline alignment have not been recently disturbed, and valley fever fungus may be present. If present, dust generated by construction activities may expose adjacent residents to this pathogen and associated health effects. However, the project would incorporate standard dust control measures required by the Ventura County APCD, which would minimize dust generation and the potential for valley fever infection.

#### 4.3.2.2 Cumulative Impacts

Many of the cumulative projects listed in Section 3.4 would include construction activities that would generate air pollutant emissions. However, these emissions would be temporary in nature and dispersed over almost 50 square miles. Therefore, construction emissions are unlikely to cause exceedances of air quality standards, and are considered a less than significant cumulative impact.

Many of the cumulative projects listed in Section 3.4 would involve new land uses and/or some increase in use, which would generate motor vehicle trips and associated emissions. Cumulative operations emissions are considered potentially significant due to the large number of trips generated. However, the incremental contribution of the proposed project would not be cumulatively considerable.

#### 4.3.3 Mitigation Measures

Implementation of the emissions reduction measures incorporated into the project would avoid significant air quality impacts; therefore, mitigation measures are not required.

#### 4.3.4 Consistency with 2002 Program EIR/EA

The proposed pipeline alignment modification (Phase 2 - Upper Reach) would not result in any new air quality impacts, or modify the severity of previously identified impacts. Overall, long-term (operation) impacts would be less than significant and short-term (construction) impacts would be reduced by incorporation of emissions reduction measures. Therefore, the findings of this analysis are consistent with the Program EIR/EA for Segment C-D of the CRSMP.

### 4.4 BIOLOGICAL RESOURCES

#### 4.4.1 Setting

##### 4.4.1.1 Existing Resources

The project site is located within the Las Posas Valley, formed by South Mountain and Oak Ridge to the north and the Las Posas Hills to the south. The Valley has been intensely cultivated for many decades, supporting row crops and orchard crops (citrus, avocado). Residential development is limited to the City of Camarillo to the southwest, the community of Somis, and scattered rural residential areas. Wildlife habitats in the area are mostly limited to drainages and tree windrows. Additional information regarding the wildlife habitats of the region and the regulatory environment can be found in the 2002 Program EIR/EA.

**Vegetation.** The Phase 2 (Upper Reach) alignment primarily traverses agricultural lands along roadways (Somis Road, State Route 118) and along the Union Pacific Railroad tracks. Affected vegetation is mostly agricultural crops, associated windrows (mostly comprised of eucalyptus trees) and weedy species typically found along roadways and agricultural lands. Native vegetation along the alignment is limited to patches of arroyo willow (*Salix lasiolepis*) and mulefat (*Baccharis salicifolia*) within some of the drainages to be crossed.

**Wildlife.** Wildlife observed during the field survey (August 22 and 29, 2012) of the Phase 2D alignment included fence lizard, cliff swallow, song sparrow, Anna's hummingbird, California quail, house finch, red-tailed hawk, California towhee, spotted towhee, western gull, brewer's blackbird, scrub jay, American crow, phainopepla, northern mockingbird, mourning dove, roadrunner, brown-headed cowbird, common raven, California ground squirrel, black-tailed deer, raccoon and coyote. Wildlife activity was focused in trees along drainages and in row crops (in fruit). Red-tailed hawks were observed perching in gum trees within Fox Barranca and Coyote Canyon and these species may nest here.

**Wildlife Corridors.** Wildlife migration corridors are generally defined as connections between habitat patches that allow for physical and genetic exchange between otherwise isolated animal populations. Migration corridors may be local such as between foraging and nesting or denning areas, or they may be regional in nature. Migration corridors are not unidirectional access routes; however, reference is usually made to source and receiver areas in discussions of wildlife movement networks. "Habitat linkages" are migration corridors that contain contiguous strips of native vegetation between source and receiver areas. Habitat linkages provide cover and forage sufficient for temporary habitation by a variety of ground-dwelling animal species. Wildlife migration corridors are essential to the regional ecology of an area as they provide avenues of genetic exchange and allow animals to access alternative territories as fluctuating dispersal pressures dictate.

Drainages are typically used as movement corridors as they generally provide continuous habitat and favorable topography to allow movement between larger habitat areas. Some of the drainages (Groves Place Drain, unnamed agricultural drain east of Coyote Canyon, Sand Canyon, Mahan Barranca, Hunt Wash) crossed by the Phase 2 (Upper Reach) alignment are very narrow, provide minimal habitat and cover, and do not connect habitat areas. However, Fox Barranca, Coyote Canyon, Long Canyon and Grimes Canyon extend north towards the Santa Clara River, and may serve to facilitate wildlife movement between Arroyo Las Posas and the Santa Clara River. Therefore, these four drainages are considered potential wildlife movement corridors for the purposes of this impact analysis.

**Special-Status Species.** The only special-status species found during field surveys was southern California black walnut, included on the California Native Plant Society Watch List due to its limited distribution. A search of the California Department of Fish and Wildlife (CDFW) Natural Diversity Database (CNDDDB) was conducted on October 23, 2013 for reported occurrences of special-status species within the Moorpark, Camarillo, Santa Paula and Newbury Park 7.5' quadrangle maps. The following special-status species were identified within 5 miles of the Phase 2 (Upper Reach) alignment.

Listed species:

- Least Bell's vireo (*Vireo bellii pusillus*) - State and Federal Endangered: reported from Arroyo Santa Rosa, approximately 2.5 miles to the south;
- California gnatcatcher (*Polioptila californica californica*) - Federal Threatened, California species of special concern: reported from near Moorpark, approximately 3.1 miles to the east;
- Conejo dudleya (*Dudleya parva*) – Federal Threatened: reported from near Conejo Creek, approximately 3.4 miles to the south-southeast;
- Lyon's pentachaeta (*Pentachaeta lyonii*) – State and Federal Endangered: reported from near Moorpark, approximately 4.1 miles to the east; and
- Conejo buckwheat (*Eriogonum crocatum*) – State Rare: reported from near Conejo Creek, approximately 2.5 miles to the south.

Non-listed special-status species:

- Southern California black walnut (*Juglans californica*): observed at proposed pipeline crossings of Fox Barranca, Mahan Barranca, Hunt Wash and Grimes Canyon;
- Arroyo chub (*Gila orcuttii*): reported from Conejo Creek, approximately 2.1 miles to the south;
- Two-striped garter snake (*Thamnophis hammondi*): reported from Conejo Creek, approximately 2.1 miles to the south;
- Western pond turtle (*Emys marmorata*): typically found in streams and ponds, reported from Conejo Creek, approximately 2.1 miles to the south;
- Western spadefoot toad (*Spea hammondi*): west of Happy Camp Canyon, approximately 5.0 miles to the northeast;
- White-tailed kite (*Elanus leucurus*): Camarillo Regional Park, approximately 5 miles to the south;
- Loggerhead shrike (*Lanius ludovicianus*): Camarillo Regional Park, approximately 5 miles to the south;
- Southern California rufous-crowned sparrow (*Aimophila ruficeps canescens*): Camarillo Regional Park, approximately 5 miles to the south;
- Yellow warbler (*Dendroica petechia brewsteri*): Calleguas Creek near University Drive, approximately 4.8 miles to the south-southwest;
- Yellow-breasted chat (*Icteria virens*): Calleguas Creek near University Drive, approximately 4.8 miles to the south-southwest;
- San Diego desert woodrat (*Neotoma lepida intermedia*): reported from the Union Pacific Railroad right-of-way near Moorpark, approximately 0.9 miles to the east-northeast.

**Wetlands.** The U.S. Army Corps of Engineers (Corps) has jurisdiction over waters of the United States (U.S.) under the authority of the Section 404 of the Clean Water Act. The limit of jurisdiction in non-tidal waters extends to the ordinary high water mark and includes all adjacent wetlands. Waters of the U.S. are defined as:

*"All waters which are currently used, or were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters which are subject to the ebb and flow of the tide; including all interstate waters including interstate wetlands, all other waters such as intrastate lakes, rivers, streams, mudflats, sandflats, wetlands, sloughs, prairie potholes, wet meadows, playa lakes, or natural ponds, the use, degradation or destruction of which could affect interstate or foreign commerce."*

The Corps and U.S. Environmental Protection Agency define wetlands as:

*"Those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, and similar areas."*

Corps jurisdictional wetlands are determined to be present if evidence of each of three criteria is observed (hydrophytic vegetation, hydric soils, and wetland hydrology). However, the U.S. Fish and Wildlife Service (USFWS) and the California Department of Fish and Wildlife (CDFW) wetland definition requires that only one of the wetland criteria is present to define a wetland but assumes that wetland hydrology is present if hydric soils or hydrophytic vegetation are present.

The U.S. Fish and Wildlife Service and CDFW define wetlands as:

*"...lands transitional between terrestrial and aquatic systems where the water table is usually at or near the surface or the land is covered by shallow water. For the purposes of this classification, wetlands must have one or more of the following attributes: 1) at least periodically, the land supports predominantly hydrophytes; 2) the substrate is predominantly undrained hydric soil; and 3) the substrate is non-soil and is saturated with water or covered by shallow water at some time during the growing season each year."*

The Ventura County General Plan Goals, Policies and Programs document defines wetlands as:

*"...lands transitional between terrestrial and aquatic systems where the water table is usually at or near the surface or the land is covered by shallow water. The frequency of occurrence of water is sufficient to support a prevalence of vegetative or aquatic life that requires saturated or seasonally saturated soil conditions for growth and reproduction. Wetlands include marshes, bogs, sloughs, vernal pools, wet meadows, river and stream overflows, mudflats, ponds, springs and seeps."*

Waters of the U.S. in the project area include Groves Place Drain, Fox Barranca, Coyote Canyon, Sand Canyon, Mahan Barranca, Long Canyon, Hunt Wash and Grimes Canyon.

A wetland delineation was not conducted; however, Fox Barranca, Sand Canyon, Mahan Barranca, Hunt Wash and Grimes Canyon support a predominance of hydrophytic (wetland) vegetation (mulefat, giant reed, arroyo willow), and appear to meet the USFWS, CDFW and Ventura County wetland definitions. The National Wetlands Inventory identifies USFWS-defined wetlands within Groves Place Drain, Fox Barranca, Coyote Canyon, Sand Canyon, Mahan Barranca, Long Canyon, Hunt Wash and Grimes Canyon. However, these drainages do not appear to support sufficient surface water to develop hydric soils, and are unlikely to meet the Corps wetland definition.

#### 4.4.1.2 Significance Thresholds

As Lead Agency, CMWD has adopted the following significance thresholds for the proposed project:

- 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, the U.S. Fish and Wildlife Service, or the National Marine Fisheries Service;
- Have a substantial adverse effect on non-Corps-defined wetlands or a sensitive natural community identified in local or regional plans, policies, regulation, or by the California Department of Fish and Game, the U.S. Fish and Wildlife Service, or the National Marine Fisheries Service;
- Have a substantial adverse effect on Corps-defined 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, hydrological interruption, or other means;
- 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 site;
- Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan;
- Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; and
- Substantially degrade the quality of the environment, substantially reduce the habitat of a fish and wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of an endangered, rare or threatened species.

## 4.4.2 Impact Analysis

### 4.4.2.1 Project-Specific Impacts

It is anticipated that the pipeline would be installed under the streambed using trenchless methods at Fox Barranca, Coyote Canyon, unnamed agricultural drain east of Coyote Canyon, Sand Canyon drainage, Mahan Barranca, Long Canyon, Hunt Wash and Grimes Canyon. Therefore, vegetation within these drainages would be avoided during pipeline installation. In addition, project facilities would be fully buried, allowing for colonization by vegetation of both the temporary (construction) and permanent easement areas.

**Vegetation.** The majority of vegetation affected by pipeline installation would be row crops and orchards. Non-crop areas affected by pipeline installation include agricultural roads, roadway shoulders and disturbed areas, including:

- Blue gum windrows: 0.29 acres;
- Pepper tree windrow: 0.04 acres; and
- Annual grassland: 0.53 acres east of Sand Canyon.

No sensitive vegetation or suitable habitat for special-status species would be affected. Therefore, loss of vegetation associated with pipeline installation is considered a less than significant impact.

**Wildlife.** As discussed under “Vegetation” above, loss of non-crop vegetation would be limited to small patches, mostly tree windrows. Overall, loss of vegetation would be less than one acre and would not substantially affect the integrity of wildlife habitats in these drainages. However, take (direct mortality, loss of active nests) of raptors and other birds protected under the California Fish and Wildlife Code and Federal Migratory Bird Treaty Act may occur as a result of removal of tree windrows, and trenchless pipeline installation activities adjacent to larger drainages. In particular, red-tailed hawks are likely to breed in Fox Barranca and Coyote Canyon and may be adversely affected by pipeline installation. Impacts to breeding birds are considered potentially significant.

**Wildlife Corridors.** Pipeline installation across drainages considered to be potential wildlife movement corridors (Fox Barranca, Coyote Canyon, Long Canyon, Grimes Canyon) would be conducted using trenchless methods, which would avoid direct impacts (habitat removal, barriers) to wildlife movement. However, noise, dust and lighting (as needed) associated with pipeline installation under the streambed may temporarily reduce the value of these drainages as wildlife movement corridors. This impact is considered less than significant due to the small area affected, the lack of special-status species and temporary nature of the impact (a few weeks).

**Special-Status Species.** Trenched pipeline crossings at Mahan Barranca and Hunt Wash would result in the loss of a few southern California black walnut trees. This impact is considered less than significant because this species is common in the region and does not meet the definition of rare or endangered under Section 15380 of the State CEQA Guidelines.

Special-status riparian birds (Cooper's hawk, yellow warbler, yellow-breasted chat) may occur with Arroyo Las Posas adjacent to the Phase 2D alignment, and possibly within riparian forest along the Union Pacific Railroad tracks east of Coyote Canyon. Loss of habitat for these species would be avoided by trench-less pipeline crossings of Coyote Canyon and the agricultural drainage to the east, under the streambed.

Suitable habitat for other special-status wildlife species would not be affected by proposed pipeline installation and operation. In addition, special-status species have not been reported from the vicinity of the Phase 2 (Upper Reach) pipeline alignment and were not observed during the biological field survey.

**Wetlands.** Pipeline crossings of drainages potentially supporting wetlands would be conducted using trench-less methods, such that the pipe would be inserted below the scour depth of the drainage and disturbance of the streambed (and any associated wetlands) would be avoided.

#### 4.4.2.2 Cumulative Impacts

The proposed 15 lot subdivision in Santa Rosa Valley would involve loss of up to 50 acres of native vegetation and wildlife habitat. When these impacts are combined with project-specific impacts, cumulative impacts may be considered significant. However, the incremental contribution of the proposed project would not be cumulatively considerable, due to the small area and low quality of affected habitat.

#### 4.4.3 Mitigation Measures

The following measure is taken from the Program EIR/EA to reduce potential take of raptors and migratory birds:

- Breeding bird surveys shall be conducted by CMWD in May and June prior to the initiation of construction at all proposed creek crossings and pipeline segments adjacent to creeks or other native vegetation. Surveys shall include all suitable habitat within 500 feet of identified impact areas. No heavy equipment shall be operated within 200 feet of any active nest of migratory bird species.

#### 4.4.4 Residual Impacts

Implementation of the above mitigation measure would reduce biological impacts of the project to a level of less than significant.

#### 4.4.5 Consistency with 2002 Program EIR/EA

The proposed pipeline alignment modification (Phase 2 - Upper Reach) would avoid riparian vegetation and wildlife habitats along Arroyo Las Posas as compared to the preferred Segment C-D alignment assessed in the Program EIR/EA. Specifically, Impact BIO-9 (sensitive riparian vegetation) of the Program EIR/EA would be avoided and Impacts BIO-10 (wetlands) and BIO-11 (special-status species) would be reduced.

## 4.5 CULTURAL RESOURCES

The following information summarizes the findings of an Archaeological Survey Report prepared for the project by Conejo Archaeological Consultants (2013). Note that the archeological field survey was limited to the Phase 2D alignment, as the precise alignment of Phase 2E has not been fully determined.

### 4.5.1 Setting

#### 4.5.1.1 Existing Resources

**Prehistory.** The archaeological record indicates that sedentary populations occupied the coastal regions of California more than 9,000 years ago (Greenwood, 1972). Several chronological frameworks have been developed for the Chumash region. One of the most definitive works on Chumash chronology is that of King (1990). King postulates three major periods: Early, Middle and Late. Based on artifact typologies from a great number of sites, he was able to discern numerous style changes within each of the major periods.

The Early Period (8000 to 3350 years Before Present [B.P.]) is characterized by a primarily seed processing subsistence economy. The Middle Period (3350 to 800 years B.P.) is marked by a shift in the economic/subsistence focus from plant gathering and the use of hard seeds, to a more generalized hunting-maritime-gathering adaptation, with an increased focus on acorns. The full development of the Chumash culture, one of the most socially and economically complex hunting and gathering groups in North America, occurred during the Late Period (800 to 150 years B.P.).

**Ethnography.** The Phase 2 (Upper Reach) alignment lies within the historic territory of the Native American Indian group known as the Chumash. The Chumash occupied the region from San Luis Obispo County to Malibu Canyon on the coast, and inland as far as the western edge of the San Joaquin Valley, and the four northern Channel Islands (Grant, 1978). The Chumash are subdivided into factions based on distinct dialects.

The Ventureño were the southernmost Chumash group, occupying most of the area of present day Ventura County and the southwest corner of Los Angeles County. The name Ventureño is derived from the mission with local jurisdiction, San Buenaventura.

The Chumash aboriginal way of life ended with Spanish colonization. As neophytes brought into the mission system, they were transformed from hunters and gatherers into agricultural laborers and exposed to diseases to which they had no resistance. By the end of the Mission Period in 1834, the Chumash population had been decimated by disease and declining birthrates. Population loss as a result of disease and economic deprivation continued into the next century. Today, many people claim their Chumash heritage in Ventura County. In general, they place high value on objects and places associated with their past history, especially burials, grave goods, and archaeological sites.

**Regional History.** In 1769 Gaspar de Portola Expedition departed the newly established San Diego settlement and marched northward toward Monterey, with the objective to secure that port and establish five missions along the route. The closest mission to the proposed pipeline alignment is Mission San Buenaventura (approximately 17 miles to the west), founded by Father Serra in 1782 (Triem, 1985).

Mexico gained its independence from Spain in 1822, and fourteen years later the Missions were secularized and their lands granted as rewards for loyal service or in response to an individual's petition. The project site falls within the historic territory of the *Rancho Los Pozas* granted to Jose Carrillo in 1834 (Cowan, 1977). The Mexican Period ended with the signing of the Treaty of Guadalupe Hidalgo on February 2, 1848, which transferred control of California, New Mexico, Texas, and other western properties to the United States.

**Local History.** During the early American Period, the Rancho lands were sold off and cattle ranching continued to be a major economic activity in the project region. In 1888, Thomas Bard and David Perkins purchased and leased land to farmers in the Somis area. The Somis town site was laid out in 1892. Early crops grown in the Somis area included lima beans, wheat, barley, and sugar beets (Triem, 1985). A branch of the Southern Pacific Railroad was constructed through Somis in 1900 and reached Santa Susana (Simi Valley) in 1904, thus providing better access to Los Angeles markets for local farmers. Since the turn of the 20th century, the Somis area has remained an area of agricultural importance, although the area is slowly becoming more urbanized.

**Archeological Resources Record Search.** Lindsey Noyes, staff researcher at the South Central Coast Information Center (SCCIC), conducted a records search on February 16, 2012. The records search included a map of all archaeological site records and investigative reports within a 0.5-mile radius of the entire Phase 2 (Upper Reach) pipeline alignment. Ms. Maki of Conejo Archeological Consultants conducted a follow up visit to the SCCIC on August 30, 2012, to review archaeological survey reports. Six archaeological sites are recorded within a 0.5-mile radius of the Phase 2 (Upper Reach) pipeline alignment, as described below:

Site CA-VEN-228. This prehistoric site is located on a knoll north of State Route 118 near the eastern portion of the pipeline alignment. King and Decker recorded one mano, one core tool and one fused shale flake at this prehistoric site in 1970.

Site CA-VEN-631. This prehistoric site is located along the north bank of Arroyo Las Posas south of Somis. Lopez recorded ground stone and lithics located in 1979. The boundaries of Site CA-VEN-631 were later expanded to north of the railroad tracks by Haslouer in 2001.

Site CA-VEN-661H. This historic site consisted of a vacant lot with the remnants of foundation and broken concrete slab, which was site of a former blacksmith shop, erected around 1882. Ceramic and glass shards dated around 1900, square nails and a hand-forged carriage bolt were also found at this site.

Site CA-VEN-673H. This historic site was marked by a large pepper tree, fragments of crockery and glass, galvanized iron water pipe, clam shell fragments, broken brick and possible mano fragments, which may represent an early twentieth century farmhouse. Currently, the pepper tree has been removed and the hillside cleared.

Site CA-VEN-864. This prehistoric site was recorded as a very sparse lithic scatter consisting of "two chips of fused shale and two pieces of marine shell". Based on a limited subsurface test program, which resulted in no evidence of subsurface deposits, Site CA-VEN-864 was determined to be an insignificant cultural deposit.

Site CA-VEN-1089. This prehistoric site consists of one circular granitic mano/abrader, unidentified marine shell fragments and burnt large mammal bone fragments. A shovel test pit program at Site CA-VEN-1089 determined that the site was larger than originally recorded to the east of the railroad tracks and that there was some subsurface deposit as noted below:

*In all, eight shovel tests were excavated [to the east of the originally recorded boundary] by the field team to a depth of 60 centimeters, over a total distance of 600 feet along the inland corridor. Cultural material was recovered from 5 of the 8 tests; a human phalange was discovered at the 30-40 centimeter level in shovel test #3. Excavation ceased at that level in test #3. The Chumash consultants notified the sheriff and coroner in accordance with state law.*

**Historical Records Search.** The listings of the National Register of Historic Places, California Historical Landmarks, California Register of Historical Resources, and California Points of Historical Interest include no properties within a 0.5-mile radius of the Phase 2 (Upper Reach) alignment.

The California State Historic Resources Inventory lists eight properties that have been evaluated in Somis; all of which were determined ineligible for listing on the National Register of Historic Places by consensus through the Federal Section 106 process. None of these properties are located within the vicinity of the Phase 2 (Upper Reach) alignment.

There are three designated Ventura County Landmarks within the community of Somis (Ventura County 2003) near the Phase 2 (Upper Reach) pipeline alignment.

- Landmark No. 85: Somis Thursday Clubhouse, 5380 Bell Street.
- Landmark No. 128: Fulkerson Hardware Store, 3403 Somis Road.
- Landmark No. 133: Somis School, 5268 North Street.

**Native American Consultation.** A sacred lands file check was conducted by Katy Sanchez of the Native American Heritage Commission on February 8, 2012. No sacred lands were identified within or adjacent to the Phase 2 (Upper Reach) pipeline alignment. A request for information regarding cultural resource concerns was emailed or mailed to 17 Native American contacts on February 11, 2012, and included a project description.

As of October 28, 2013, two responses have been received. The first was a telephone call from Patrick Tumamait who indicated that there was a village site in the Somis area, and that the entire project area should be considered culturally sensitive and monitored during pipeline installation. Julie Tumamait emailed that her cousin had noted cultural materials in the Somis area during monitoring, but did not provide a location.

**Field Surveys.** Archeological field surveys were limited to the Phase 2D portion of the pipeline alignment, as the precise alignment of Phase 2E has not been fully determined. Ms. Maki of Conejo Archeological Consultants conducted an archaeological survey of the Phase 2D pipeline alignment on August 22 & 29, 2012 (see Figures 3 and 4). Archaeologist Gwen Romani assisted both days with the field survey. The project's Area of Potential Effect (APE) was determined to be comprised of a minimum 55 foot-wide corridor encompassing temporary (construction) and permanent pipeline easements.

Survey methodology consisted of walking four transects spaced at approximately 15 feet apart within the APE corridor, where feasible. The total linear length of pipeline alignment surveyed was approximately 2.55 miles long, with a total coverage of approximately 17 acres.

Ground surface visibility was excellent across 75 percent of the project site, due to recently plowed fields and sparse vegetation/crop growth. In a large strawberry field, plastic covering limited ground surface visibility to about 20 percent. Survey coverage in this field included careful inspection of all dirt roads within the APE, and surveying the narrow rows between the strawberry beds. The Phase 2D APE also crosses one large nursery. Here, the APE follows a dirt road, which was surveyed as well as any open spaces along the road. Dense riparian vegetation limited ground surface visibility within the drainage crossings.

A recently disked agricultural field afforded excellent visibility in the area where the APE borders archaeological site CA-VEN-631; the prehistoric site is located at a lower elevation to the south of the APE and the railroad tracks. Site CA-VEN-631's northern boundary has not been determined and the archaeological site record indicates that it could possibly extend into the current project APE.

Site CA-VEN-1089 is located in an open field adjacent to the railroad tracks. Ground surface visibility was good in the site area, but only one small marine shell fragment was observed within the mapped site location. It is possible that surface materials were collected by the Peak and Associates archaeologists who conducted subsurface testing on the site in 1992.

Other than the one fragment of marine shell potentially associated with Site CA-VEN-1089, no archaeological resources were observed within the Phase 2D APE. The Phase 2D APE has been subject to previous ground disturbances including agricultural disking, road grading and trenching for various utilities.

#### 4.5.1.2 Significance Thresholds

Section 15064.5 of the State CEQA Guidelines states that a substantial adverse change in the significance of an historical resource may have a significant effect on the environment. Adverse changes may include demolition, destruction, relocation or alteration of the resource or its immediate surroundings. For the purposes of this document, a substantial adverse change to a historically significant resource is considered a significant impact.

A cultural resource shall be considered to be "historically significant" if the resource meets the criteria for listing on the California Register of Historic Resources (Pub. Res. Code SS5024.1, Title 14 CCR, Section 4852) including the following:

- Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
- Is associated with the lives of persons important in our past;
- Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
- Has yielded, or may be likely to yield, information important in prehistory or history.

## 4.5.2 Impact Analysis

### 4.5.2.1 Project-Specific Impacts

**Phase 2D Historical and Archeological Resources.** Prehistoric archeological site CA-VEN-631 is located immediately adjacent to the Phase 2D alignment. However, the northern boundary of this site is undetermined, and buried portions of this site could extend into the Phase 2D APE. Therefore, pipeline installation activities may result in disturbance of this site, and impacts are considered potentially significant

Prehistoric archeological site CA-VEN-1089 is located in close proximity to the eastern end of the Phase 2D APE, and buried portions of this site could extend into the Phase 2D APE. The finding of a human phalange (finger bone) indicates that there may be burials in the general area. Pipeline installation activities may result in disturbance of this site. Project-related disturbance of archeological sites may result in the loss of artifacts and/or loss of stratigraphic integrity. Therefore, impacts are considered potentially significant.

**Phase 2E Historical and Archeological Resources.** The currently proposed pipeline alignment is parallel to State Route 118 (Los Angeles Avenue) and located about 50 feet north of the right-of-way. Prehistoric archeological site CA-VEN-228 is located in close proximity to the eastern end of the Phase 2E alignment, and pipeline installation activities may result in disturbance of this site. Project-related disturbance of archeological sites may result in the loss of artifacts and/or loss of stratigraphic integrity. Therefore, impacts are considered potentially significant.

**Paleontological Resources.** A record search was conducted of the on-line collections data base of the University of California Museum of Paleontology. A large diversity of marine invertebrates (foraminiferans) from the Miocene and Oligocene periods has been reported from Grimes Canyon, northeast of the eastern terminus of the pipeline alignment. No paleontological resources have been reported from the immediate project area, and impacts to such resources are not anticipated.

#### 4.5.2.2 Cumulative Impacts

Most of the cumulative projects listed in Section 3.4 are located in agricultural areas that have been cultivated for decades, and are unlikely to affect intact cultural resources. However, cultural record searches or archeological field studies have not been conducted for most of the projects and the significance of cumulative impacts is unknown. The proposed project would incrementally contribute to cumulative impacts to cultural resources. However, implementation of proposed mitigation would reduce the incremental contribution to cumulative impacts.

#### 4.5.3 Mitigation Measures

##### 4.5.3.1 Phase 2D

The following measures are provided to avoid or minimize any potentially significant impacts to buried prehistoric cultural resources.

1. A qualified archeologist shall conduct an Extended Phase 1 subsurface excavation using shovel test pits to determine the presence or absence of cultural deposits within the Phase 2D APE that borders Site CA-VEN-631. A Chumash representative shall be retained to monitor the Extended Phase 1 excavation of this site.
2. A qualified archeologist shall conduct an Extended Phase subsurface testing program at Site CA-VEN-1089. Prior to testing, additional background research should be undertaken regarding previous subsurface investigations. The findings of the background research shall be used to determine the extent and method of the Extended Phase 1. A Chumash representative shall be retained to monitor the Extended Phase 1 excavation of this site.
3. Prior to initiation of pipeline installation activities, an archaeologist shall provide all workers associated with earth-disturbing activities an orientation regarding the probability of exposing cultural resources and directions as to what steps are to be taken if a find is encountered.
4. In the event that archaeological resources are exposed during project construction, all earth disturbing work within the vicinity of the find must be temporarily suspended until a qualified archaeologist has evaluated the nature and significance of the find. The CMWD shall be notified of any such find. A Chumash representative shall monitor any archaeological field work associated with Native American materials.
5. If human remains are unearthed, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the Native American Heritage Commission. The CMWD shall also be notified of any such find.

#### 4.5.3.2 Phase 2E

The following measures are provided to avoid or minimize any potentially significant impacts to buried prehistoric cultural resources.

1. A qualified archeologist shall conduct a Phase 1 archaeological survey of the Phase 2E pipeline alignment prior to finalization of the alignment.
2. If feasible, the Phase 2E alignment should be modified as needed to avoid potential impacts to Site CA-VEN-228 and any other resources identified during the archeological survey. If the CMWD determines that modification of the Phase 2E alignment is not feasible, a qualified archeologist shall conduct an Extended Phase 1 subsurface excavation using shovel test pits to determine the presence or absence of cultural deposits within the pipeline alignment that would affect Site CA-VEN-228. A Chumash representative shall be retained to monitor the Extended Phase 1 excavation of this site.
3. Prior to initiation of pipeline installation activities, an archaeologist shall provide all workers associated with earth-disturbing activities an orientation regarding the probability of exposing cultural resources and directions as to what steps are to be taken if a find is encountered.
4. In the event that archaeological resources are exposed during project construction, all earth disturbing work within the vicinity of the find must be temporarily suspended until a qualified archaeologist has evaluated the nature and significance of the find. The CMWD shall be notified of any such find. A Chumash representative should monitor any archaeological field work associated with Native American materials.
5. If human remains are unearthed, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the Native American Heritage Commission. The CMWD shall also be notified of any such find.

#### 4.5.4 Residual Impacts

Implementation of mitigation measures provided above would avoid or reduce impacts to cultural resources to a level of less than significant.

#### 4.5.5 Consistency with 2002 Program EIR/EA

The proposed pipeline alignment modification (Phase 2 - Upper Reach) may adversely affect archeological sites CA-VEN-631, CA-VEN-1089 and CA-VEN-228, while the preferred Segment C-D alignment assessed in the Program EIR/EA may adversely affect archeological sites CA-VEN-631 and CA-VEN-864. Overall, the potential for disturbance of cultural resources would be very similar for the proposed alignment modification. Therefore, the findings of this analysis are consistent with the Program EIR/EA for Segment C-D of the CRSMP.

## 4.6 GEOLOGY AND SOILS

### 4.6.1 Setting

Earth materials present along the proposed Phase 2 (Upper Reach) pipeline alignment consist of alluvium of the Arroyo Las Posas floodplain (Dibblee, 1992). However, some portions of the alignment would traverse artificial fill associated with roadway and/or railroad construction. Soils along the Phase 2 (Upper Reach) alignment include Sorrento silty clay loam, Sorrento loam, Salinas clay loam, Pico sandy loam, Pico loam and Mocho loam (Edwards et al., 1970).

The entire Southern California region, including the Somis area, is located within a seismically active area. The Simi Fault is located approximately one mile south of the proposed pipeline alignment. The proposed pipeline alignment is not located within a designed Alquist-Priolo Special Studies Zone.

Liquefaction occurs when strong, cyclic motions during an earthquake cause water-saturated soils to lose their cohesion and take on a liquid state. Liquefied soils are unstable and can subject overlying structures to substantial damage. The occurrence of liquefaction is highly dependent on local soil properties, depth to groundwater, and the strength and duration of a given ground-shaking event. Most of the Phase 2 (Upper Reach) alignment is located within a liquefaction hazard area (California Department of Conservation, 2000 and 2002).

Ground shaking is the cause of most damage during earthquakes. The predominant (10 percent probability of exceedance in 50 years) earthquake in the project area is magnitude 6.9. In the project area, the peak ground acceleration with a probability of 10 percent exceedance in 50 years is 0.62 g in alluvium conditions (California Department of Conservation, 2000).

Subsidence is generally related to over-pumping of groundwater or petroleum reserves from deep underground reservoirs. No recognized subsidence has been identified within the project area (Ventura County General Plan Hazards Appendix, updated 2011).

Expansive soils are primarily clay-rich soils subject to changes in volume with changes in moisture content. Shrinking and swelling of soils can damage overlying structures, roadways, and utilities. Soils along the pipeline alignment have a low to moderate shrink-swell potential (Edwards et al., 1970). In addition, the proposed pipeline alignment is not located within an expansive soil zone (Ventura County General Plan Hazards Appendix, updated 2011).

Areas of high landslide or mudflow potential are typically hillside areas with slopes of greater than 10 percent. Slopes located south of Arroyo Las Posas (at least 500 feet from the Phase 2 (Upper Reach) alignment) have been included within an Earthquake-Induced Landslide Hazard Zone (California Department of Conservation, 2000).

## 4.6.2 Impact Analysis

### 4.6.2.1 Project-Specific Impacts

**Seismic Hazards and Landslides.** Due to the presence of faults in the immediate project area, the potential exists for fault rupture to damage the proposed pipeline during the design life of the project. However, the engineering of the project pipeline would consider the seismic environment and the pipeline would be designed and installed to be resistant to seismic-related damage, including ground-shaking. The proposed pipeline alignment is relatively level and not subject to landslides. The proposed project would not increase the number of persons exposed to existing seismic hazards. Therefore, seismic-related impacts are considered less than significant.

**Soil Erosion.** The proposed pipeline alignment is relatively level and not subject to excessive erosion. Pipeline installation would involve temporary removal of vegetation (including crops), and could result in soil erosion. However, pipeline installation would be subject to the State's general storm water permit (Water Quality Order 2009-0009-DWQ), which would require implementation of best management practices to minimize soil erosion. In addition, pipeline crossings of larger drainages would be installed under the drainage using trench-less methods, which would prevent erosion of the streambed during storm events. Overall, the potential for soil erosion is considered less than significant.

**Subsidence.** According to the Ventura County General Plan Hazards Appendix, the affected area is not located in a subsidence zone. As such the project is not expected to be subject to impacts associated with land subsidence.

**Expansive Soils.** The proposed pipeline would not be located in areas known to have expansive soils. In any case, engineered backfill would be used to minimize potential damage to project facilities from expansive soils. No impacts associated with expansive soils are anticipated.

**Soil Suitability for Wastewater Disposal.** Septic or other wastewater disposal systems are not proposed as part of this project. No impacts would result.

### 4.6.2.2 Cumulative Impacts

Three cumulative projects are located in close proximity to the Phase 2 (Upper Reach) alignment and could be affected by the same geological hazards: office addition at 3100 Somis Road, legalization of veterinarian hospital, and the four lot subdivision at La Cumbre Road. Only the 4 lot subdivision would involve substantial new construction and could be affected by geologic hazards. This subdivision is located within a liquefaction hazard area, and future residents may be adversely affected. In addition, construction of this project during the rainy season may result in soil erosion. Overall, cumulative geology and soils impacts are likely to be less than significant because they would not affect the same land uses and the cumulative projects would be properly designed to suit local geologic conditions.

## 4.6.3 Mitigation Measures

No significant geologic hazards were identified; therefore, mitigation measures are not required.

#### 4.6.4 Consistency with 2002 Program EIR/EA

The findings of this analysis are consistent with the Program EIR/EA for Segment C-D of the CRSMP. However, currently proposed trench-less drainage crossings would avoid potentially significant soil erosion impacts identified in the Program EIR/EA.

### 4.7 GREENHOUSE GAS EMISSIONS

#### 4.7.1 Setting

##### 4.7.1.1 Background

Greenhouse gases (GHG) are defined as any gas that absorbs infrared radiation in the atmosphere. Greenhouse gases include, but are not limited to, water vapor, carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), and nitrous oxide (N<sub>2</sub>O). These GHGs lead to the trapping and buildup of heat in the atmosphere near the earth's surface, commonly known as the Greenhouse Effect. There is increasing evidence that the Greenhouse Effect is leading to global climate change.

In 2006, the California State Legislature adopted AB 32, the California Global Warming Solutions Act of 2006 and the Governor signed it into law. AB 32 focuses on reducing GHG emissions in California. GHG as defined under AB 32 include: water vapor, carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. AB 32 requires the California Air Resources Board (CARB), the State agency charged with regulating statewide air quality, to adopt rules and regulations that would achieve GHG emissions equivalent to statewide levels in 1990 by 2020. In addition, two State-level Executive Orders have been enacted by the Governor (Executive Order S-3-05, signed June 1, 2005, and Executive Order S-01-07, signed January 18, 2007) that mandate reductions in GHG emissions.

From 2007 to 2009, CARB has promulgated several discrete early action measures to reduce GHG emissions prior to the full and final adoption of a plan to reduce aggregate California GHG emissions to 1990 levels by 2020. Senate Bill 97, enacted in 2007, amends the CEQA statute to clearly establish that GHG emissions and the effects of GHG emissions are appropriate for CEQA analysis. It directs the California Office of Planning and Research (OPR) to develop guidelines *"for the mitigation of greenhouse gas emissions or the effects of greenhouse gas emissions as required by this division."* (Pub. Res. Code § 21083.05(a)).

In December of 2009, the California Natural Resources Agency adopted amendments to the CEQA Guidelines (tit. 14, Cal. Code of Regs., § 15000 et seq.) to comply with the mandate set forth in Public Resources Code § 21083.05. These revisions became effective March 18, 2010. According to GHG amendments to the CEQA Guidelines, each public agency that is a CEQA lead agency needs to develop its own approach to performing a climate change analysis for projects that generate GHG emissions. A consistent approach should be applied for the analysis of all such projects, and the analysis must be based on best available information.

4.7.1.2 Significance Thresholds

To date, in California, there are no formally adopted or published CEQA thresholds of significance for project specific or cumulative anthropogenic GHG emissions. Formulating such significance thresholds for CEQA purposes is especially problematic for GHG emissions because, unlike other air pollutant emissions that create impacts in local and regional air basins (i.e., air pollution nonattainment areas or toxic air contaminant hotspots), anthropogenic GHG emissions are implicated as a cause for global climate change regardless of their emission source or location.

Moreover, simply estimating GHG emissions from a specific project is not an adequate way to gauge the degree to which those emissions would contribute to global warming or climate change. Substantial additional scientific research and regulatory guidance are needed to determine whether a project’s incremental GHG emissions impacts on climate change would be significant, and whether and how cumulative GHG emissions will affect global climate change.

4.7.2 Impact Analysis

4.7.2.1 Project-Specific Impacts

**Greenhouse Gas Emissions.** Pipeline installation would result in GHG emissions, primarily in the form of CO<sub>2</sub> exhaust emissions from the use of off-road construction equipment and on-road vehicles. Emissions of GHG from construction-related sources were estimated using CARB’s EMFAC2007 Model and emission factors provided in the California Climate Action Registry General Reporting Protocol. Estimated emissions of GHG associated with project construction are 646.0 metric tons of CO<sub>2</sub> equivalent (MTCO<sub>2</sub>E) and are presented below in Table 4. Amortized over the 50 year life of the pipeline, GHG emissions would be 12.9 MTCO<sub>2</sub>E per year. Because construction emissions would be less than the 7,000 MTCO<sub>2</sub>E per year threshold suggested by the CARB for projects, and because the VCAPCD has not yet set a threshold, short-term GHG impacts are considered less than significant.

**Table 4. Construction-Related Greenhouse Gas Emissions**

| Source   | CO <sub>2</sub> Emissions<br>(metric tons) | CH <sub>4</sub> Emissions<br>(metric tons) | N <sub>2</sub> O Emissions<br>(metric tons) |
|--|--|--|---|
| Total GHG Emissions  | 638.1                                      | 0.037                                      | 0.024                                       |
| Global Warming Potential Factor                            | 1  | 25   | 298   |
| Total CO <sub>2</sub> Equivalent Emissions                 | 638.1                                      | 0.92                                       | 7.02  |
| Total Metric Tons of CO <sub>2</sub> Equivalent            | <b>646.0</b>                               |  |   |
| Amortized Annual Metric Tons of CO <sub>2</sub> Equivalent | <b>12.9</b>                                |  |   |

Long-term operation of the proposed project would be limited to occasional maintenance, which would generate one motor vehicle round trip per week. Based on weekly monitoring and maintenance, the maximum GHG emissions would be 0.65 MTCO<sub>2</sub>E per year. Because operational emissions would be less than the 7,000 MTCO<sub>2</sub>E per year threshold suggested by the CARB for projects, and because the VCAPCD has not yet set a threshold, long-term GHG impacts are considered less than significant.

**Consistency with Applicable Greenhouse Gas Reduction Plans.** The project would not involve any sources of GHGs that are regulated under the State cap and trade program, or other plans or policies regulating these emissions.

#### 4.7.2.2 Cumulative Impacts

Many of the cumulative projects listed in Section 3.4 would include construction activities that would generate GHG emissions. However, these emissions would be temporary in nature and would not exceed any adopted thresholds.

Many of the cumulative projects listed in Section 3.4 would involve new land uses and/or some increase in use, which would generate motor vehicle trips and associated GHG emissions. Cumulative GHG emissions are considered potentially significant due to the large number of trips generated. However, the incremental contribution of the proposed project would not be cumulatively considerable.

#### 4.7.3 Mitigation Measures and Residual Impacts

No significant impacts related to GHG emissions were identified.

#### 4.7.4 Consistency with 2002 Program EIR/EA

At the time the Program EIR/EA was completed, GHG emissions and their potential effect on global warming were not recognized as an environmental issue to be addressed at the project level, and the State CEQA Guidelines did not require an analysis of GHG emissions. Therefore, GHG emissions were not identified as an environmental impact of the CRSMP in the Program EIR/EA. It should be noted that the currently proposed modifications to the CRSMP pipeline system addressed in this document would not substantially modify the GHG emissions of the original project addressed in the Program EIR/EA.

### 4.8 HAZARDS AND HAZARDOUS MATERIALS/RISK OF UPSET

#### 4.8.1 Setting

A "hazardous material" means any material that, because of its quantity, concentration, physical or chemical characteristics poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or environment. Appendix G of the CEQA Guidelines indicates that a project would have a significant impact if it would create a public health hazard, expose people to a potential health hazard, or pose a threat to the environment.

## 4.8.2 Impact Analysis

### 4.8.2.1 Project-Specific Impacts

**Transport, Use or Disposal of Hazardous Materials.** The proposed project would not use, transport or dispose of hazardous materials.

**Hazards Due to Upset Conditions.** No hazardous materials would be involved with construction and operation of the project. Although water to be transported by the Phase 2 (Upper Reach) pipeline is not considered hazardous, storm-related pipeline damage at drainage crossings may result in discharge to surface waters and exceedance of water quality objectives. However, the following measure from the Program EIR/EA has been incorporated into the project to minimize the potential for discharge to surface waters:

- All pipeline stream crossings shall be inspected by CMWD within 24 hours of the termination of a major storm event (return period of 5 years or greater). Flow to the affected segment shall be terminated within 4 hours upon the observation of any leakage. Exposure of the pipeline or damage (not causing leakage) shall be evaluated by CMWD within one week of observation to determine the need for repairs or protection of the pipeline to prevent future failure.

**Hazardous Emissions or Materials Near Schools.** The nearest school is Somis Elementary, located approximately 0.2 miles north of the proposed Phase 2 (Upper Reach) pipeline alignment. Although pipeline installation would occur within one-quarter mile of a school, the proposed project would not involve the use of hazardous materials or hazardous waste.

The combustion of diesel fuel in truck engines (as well as other internal combustion engines) produces exhaust containing a number of compounds that have been identified as hazardous air pollutants by EPA and toxic air contaminants by the CARB. Particulate matter (PM) from diesel exhaust has been identified as a toxic air contaminant, which has prompted ARB to develop a Final Risk Reduction Plan (released October 2000) for exposure to diesel PM. Based on ARB Resolution 00-30, full implementation of emission reduction measures recommended in the Final Risk Reduction Plan would result in a 75 percent reduction in the diesel PM Statewide inventory and the associated cancer risk by 2010, and an 85 percent reduction by 2020 in the diesel PM inventory and potential cancer risk.

Construction of the proposed project would involve diesel exhaust emissions from heavy equipment and/or heavy-duty trucks within 1,100 feet of Somis Elementary. However, this school is currently exposed to diesel exhaust emissions from truck traffic on Somis Road and Los Angeles Avenue, rail traffic on the Union Pacific Railroad tracks, nearby agricultural equipment and other regional sources. The proposed project would have a small, short-term contribution to existing diesel PM emissions, and impacts are considered less than significant.

**Listed Hazardous Materials Sites.** No hazardous materials sites listed pursuant to Government Code Section 65962.5 occur in Ventura County. However, a leaking underground storage tank site is located near the pipeline alignment at 3040 Somis Road. This site was designated as closed in 1987 by the Regional Water Quality Control Board. Pipeline installation activities would not occur within a hazardous materials site, and are not expected to encounter contaminated soil or result in any hazard to the public or the environment.

**Public Airport Safety Hazard.** The proposed pipeline alignment is located approximately 4.0 miles northeast of the Camarillo Airport. The project area is not identified in an Airport Land Use Plan, nor is it located within two miles of a public use airport. No safety hazards resulting from airport proximity are expected.

**Private Airport Safety Hazard.** The proposed pipeline alignment is not located near a private airstrip, and so would not result in a safety hazard.

**Emergency Response.** The proposed pipeline would cross under roadways using trench-less methods. Therefore, traffic operations would not be affected, including emergency access. No change in population or public access would occur. Therefore, no impacts to emergency response would occur.

**Wildland Fire Hazard.** The proposed alignment primarily supports irrigated agricultural crops; however, pockets of flammable vegetation are present and wildland fires may occur. Portions of the Phase 2 (Upper Reach) pipeline alignment (southwest of Somis, south of Sand Canyon Road/SR 118 intersection) traverse areas that have been mapped within a Moderate Fire Hazard Severity zone by CAL FIRE. However, the proposed project would not involve any habitable structures or substantially increase the risk of loss, injury or death from wildland fires.

#### 4.8.2.2 Cumulative Impacts

Many of the cumulative projects listed in Section 3.4 would result in hazardous emissions (diesel particulate matter), including two projects near Somis Elementary (office addition at 3100 Somis Road, legalization of veterinarian hospital). Construction of the office would add heavy-duty truck trips to Somis Road, and the proposed project would incrementally contribute to this cumulative impact. However, the cumulative impact is considered less than significant due to the very small increase in truck trips and associated diesel particulate matter emissions.

Some of the cumulative projects would be located in areas mapped as a High (or Very High) Fire Severity Hazard Area, and occupants may be exposed to loss of life and property associated with wildfire. The proposed project would not involve above-ground or habitable structures and would not contribute this cumulative impact.

None of the cumulative projects would involve risk of upset impacts associated with pipeline creek crossings. Therefore, cumulative risk of upset impacts would be the same as project-specific impacts, less than significant.

### 4.8.3 Mitigation Measures

The project would not result in significant impacts related to hazards and hazardous materials; therefore, mitigation measures are not necessary.

### 4.8.4 Consistency with 2002 Program EIR/EA

The initial study prepared in October 2000 for the CRSMP utilized the State-recommended checklist, which did not address all of the issues in the current checklist. However, consistent with the Program EIR/EA for Segment C-D of the CRSMP, the only significant impact identified was risk of upset from potential pipeline failure at stream crossings.

## 4.9 HYDROLOGY AND WATER QUALITY

### 4.9.1 Setting

#### 4.9.1.1 Existing Resources

The proposed Phase 2 (Upper Reach) alignment is located adjacent to Calleguas Creek and crosses nine of its tributaries. The reach of Calleguas Creek near the Phase 2 (Upper Reach) alignment is known as Arroyo Las Posas. The Phase 2 (Upper Reach) alignment is located within the Calleguas Creek Hydrologic Unit, and traverses three groundwater basins (Pleasant Valley, North Las Posas and South Las Posas). The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) has jurisdiction over waters between Rincon Point (at the western boundary of Ventura County) and the eastern Los Angeles County line. The Regional Board has developed a Water Quality Control Plan, or "Basin Plan", to protect the quality of surface and groundwaters of the region. The Basin Plan designates beneficial uses of waters within the region, sets narrative and numerical water quality objectives to protect beneficial uses, and describes implementation programs intended to meet the Basin Plan objectives.

Surface flow in Arroyo Las Posas is supported by periodic discharge of treated wastewater from the Moorpark Wastewater Treatment Plant. However, the reach below Somis is intermittent, typically dry during the summer. Based on available stream flow data, the highest flow recorded above Hitch Boulevard (near the eastern end of the Phase 2E alignment) was 16,200 cubic feet per second on February 13, 1992. Typical dry season flow in Arroyo Las Posas above Hitch Boulevard is 15 to 25 cubic feet per second.

Beneficial uses established in the Water Quality Control Plan (California RWQCB, 1994) for surface water in the Arroyo Las Posas are municipal water supply, industrial service water supply, process water supply, agricultural water supply, groundwater recharge, freshwater replenishment, water contact recreation, non-water contact recreation, warm freshwater habitat, cold freshwater habitat and wildlife habitat.

The water quality of Arroyo Las Posas is considered impaired, under Section 303(d) of the Clean Water Act, due to levels of ammonia, chlordane, chloride, chlorpyrifos, DDT, diazinon, dieldrin, fecal coliform bacteria, nitrate, nitrite, sedimentation/siltation, total dissolved solids and aquatic toxicity. A water body is impaired when data indicate that adopted water quality objectives are continually exceeded or that beneficial uses are not protected.

#### 4.9.1.2 Significance Thresholds

**Construction Water Quality.** Any project-related exceedance of the water quality objectives of the Water Quality Control Plan is considered a significant impact.

**Surface Water Quality.** Any project-related exceedance of the water quality objectives of the Water Quality Control Plan is considered a significant impact. By complying with this Plan, it is expected that surface waters are protected for aquatic life, wildlife, water contact recreation, and other designated beneficial uses. In addition, any reduction in water quantity that may threaten beneficial uses is considered a significant impact.

Water quality standards from the California Toxics Rule (Federal Register Vol. 65 No. 97, pp. 31682-31719, May 18, 2000) are used as thresholds of significance for priority toxic pollutants in surface waters.

**Surface Water Quantity.** Any project-related reduction in surface flow that would substantially reduce the potential for the affected waterbody to support identified beneficial uses is considered a significant impact.

**Groundwater Quality.** Any project-related exceedance of the water quality objectives of the Water Quality Control Plan is considered a significant impact. By complying with this Plan, it is expected that groundwaters are protected for designated beneficial uses.

**Groundwater Quantity.** Any project-related activity that would substantially increase groundwater production from an overdrafted basin is considered a significant impact. Overdraft is defined as a long-term decline in groundwater in storage caused by extraction rates exceeding recharge rates.

### 4.9.2 Impact Analysis

#### 4.9.2.1 Project-Specific Impacts

**Ocean Water Quality.** Water quality impacts associated with ocean discharge of wastewater were fully addressed in the Final EIR/EA for the CRSMP Hueneme Outfall Replacement Project (see Padre Associates, 2007).

**Construction Impacts.** The proposed project would be required to comply with the National Pollution Discharge Elimination System (NPDES) General Construction Stormwater Permit, and County of Ventura Watershed Protection District encroachment permits. CMWD would file a Notice of Intent for Coverage under the State General Construction Activity Stormwater Permit with the State Regional Water Quality Control Board, and develop and implement a Stormwater Pollution Prevention Plan (SWPPP). Conformance with these requirements would avoid significant impacts to surface water quality.

Additionally, prior to operation, the proposed pipeline would be hydro-statically tested, which may require discharge of water. Any release of water to surface waters associated with this activity would be authorized by the Regional Water Quality Control Board under General NPDES Permit no. CAG674001 (Order R4-2009-0068). The discharge would not commence until receipt of the Regional Board's Executive Officer has made a written determination of eligibility for coverage under this general permit.

In addition to the requirements of all applicable permits and agency requirements, CMWD would be held to the industry standards and best management practices for construction and operation of the pipeline. Best management practices would include, but may not be limited to those listed in the CRSMP Program EIR/EA, those to be included in the SWPPP and those listed below.

- As necessary, de-watering shall be conducted for excavation below the water table and include discharge to a sediment basin (or equivalent) if necessary to reduce turbidity or total suspended solids to meet NPDES permit requirements prior to entering storm drains, creeks or other surface water;
- To the extent feasible, heavy equipment shall be fueled in a designated area away from creeks, storm drains and culverts. This designated area shall include a drain pan or drop cloth and absorbent materials to clean up spills;
- Vehicles and equipment shall be maintained properly to prevent leakage. If maintenance must occur onsite, a designated area away from creeks, storm drains and culverts shall be used. This designated area shall include a drain pan or drop cloth and adsorbent materials to clean up spills;
- Vegetation adjacent to construction activities shall be preserved to minimize erosion.

Pipeline crossings of drainages (Groves Place Drain, Fox Barranca, Coyote Canyon, Sand Canyon, Mahan Barranca, Long Canyon, Hunt Wash Grimes Canyon) would be conducted by trench-less methods (installed under the drainage) and would avoid direct impacts to water quality. Therefore, construction activities are not anticipated to result in exceedances of water quality objectives.

**Long-Term Impacts.** The CRSMP was designed to address increasing salinity levels in the Calleguas Creek Watershed. Working with other public water and wastewater agencies, CMWD is undertaking the CRSMP to manage high salinity water use and disposal. The CRSMP pipeline system would collect treated wastewater and brine concentrates from wastewater treatment plants, groundwater wells (both municipal and agricultural), and industrial operations located within the Calleguas Creek watershed, and convey the effluent to other areas for direct use or an existing ocean outfall. Ocean disposal would allow substantial reductions in the amounts of dissolved salts and other water pollutants that are currently released into Calleguas Creek and its tributaries. This is expected to result in substantial improvements in water quality of affected creeks and groundwater supplies.

The CRSMP would enable both public and private water agencies to utilize high salinity groundwater that at the present time cannot be widely used due to poor quality. The CRSMP would facilitate disposal of brines associated with new treatment facilities, allowing use of the treated water for beneficial uses and increasing water supply reliability. Since the proposed Phase 2 (Upper Reach) is a critical component, the benefits of the greater CRSMP can be extended to the proposed project as well. No significant adverse impacts to water quality would result from operation of Phase 2 (Upper Reach) of the CRSMP.

**Risk of Upset Impacts.** Potential water quality impacts due to pipeline failure at stream crossings are addressed above in Section 4.8.

**Groundwater Depletion.** The proposed project would use small amounts of water for pipeline installation, dust control and hydro-static pipe testing. The construction contractor would provide this water, and the source is unknown. However, potential sources include local groundwater. The amount of water used would be small (a few thousand gallons a day) and temporary, and would not adversely affect groundwater supplies.

The CRSMP would facilitate treatment of poor quality groundwater by providing a method of brine disposal, which may increase groundwater production. However, such groundwater is not currently suitable for beneficial uses, and its use would not deplete existing groundwater supplies.

**Alter Existing Drainage Patterns.** The proposed project would not alter existing drainage patterns, or cause flooding. Large areas of impervious surfaces would not be created, thus increases in surface water runoff from the area would not result.

**Alter the Course of a Stream or Increase Run-off.** The project would not involve any increase in impervious surfaces, and no change in run-off volumes would occur. The project would not adversely affect existing or planned storm water drainage systems.

**Flood Hazards.** The project would not involve the construction of any housing, or otherwise expose persons to flood hazards. Based on review of applicable Flood Insurance Rate Maps (panels 06111C0932E, 06111C0813E, 60111C0814E, 06111C0818E, revised January 20, 2010), the Phase 2 (Upper Reach) alignment crosses the mapped 100-year floodplain at Fox Barranca, Coyote Canyon, Sand Canyon, Mahan Barranca, Long Canyon, Hunt Wash and Grimes Canyon. However, pipeline installation would not involve any new fill within the 100-year floodplain. Therefore, the project would not impede or redirect floodwaters, or cause an increase in floodwater elevation.

**Dam Inundation, Seiche and Tsunami Hazards.** The proposed Phase 2 (Upper Reach) alignment is not located within a dam inundation hazard zone. Tsunamis are large-scale sea waves produced by tectonic activities along the ocean floor. Seiches are freestanding or oscillatory waves associated with large enclosed or semi-enclosed bodies of water. As the proposed pipeline alignment is not located near the ocean or any large enclosed or semi-enclosed bodies of water, the project is not subject to any impacts of this nature. Debris and mudflows are typically a hazard experienced in the floodplains of streams that drain very steep watersheds. The proposed pipeline would be located in relatively level areas parallel to roadways, and would not be exposed to debris or mud flow hazards.

#### 4.9.2.2 Cumulative Impacts

Most of the cumulative projects listed in Section 3.4 would generate storm water run-off and may increase peak flows in local drainages and degrade water quality. Since most of these project sites ultimately drain to Calleguas Creek, cumulative soil erosion and water quality impacts may be significant. However, the incremental contribution of the proposed project would not be cumulatively considerable due to implementation of best management practices during pipeline installation.

The North Pleasant Valley Groundwater Treatment Plant would pump and treat poor quality groundwater and discharge to Phase 2C of the CRSMP. This project would make this groundwater available for beneficial uses, remove chloride and other salts from the watershed, and is considered a beneficial impact that would be facilitated by the proposed project.

#### **4.9.3 Mitigation Measures**

No significant impacts related to hydrology or water quality would result from the project. Therefore, no mitigation is required.

#### **4.9.4 Consistency with 2002 Program EIR/EA**

Potentially significant impacts include construction-related impacts to water quality, water quality impacts at the ocean outfall, and reduction in stream flow due to reductions in wastewater discharge to surface waters. However, utilization of the proposed Phase 2 (Upper Reach) pipeline alignment would not result in any new impacts, or modify the severity of previously identified impacts. Therefore, the Phase 2 (Upper Reach) alignment is entirely consistent with the Program EIR/EA.

### **4.10 NOISE**

#### **4.10.1 Setting**

Noise is generally defined as unwanted or objectionable sound. Noise levels are measured on a logarithmic scale because of physical characteristics of sound transmission and reception. Noise energy is typically reported in units of decibels (dB). Noise levels diminish (or attenuate) as distance to the source increases according to the inverse square rule, but the rate constant varies with the type of sound source. Sound attenuation from point sources such as industrial facilities is about 6 dB per doubling of distance. Heavily traveled road with few gaps in traffic behave as continuous line sources and attenuate at 3 dB per doubling of distance. Noise from more lightly traveled roads is attenuated at 4.5 dB per doubling of distance.

**Noise Sources and Receptors.** The dominant source of noise in the project area is generally vehicle traffic on major roadways, primarily State Route 118 (Los Angeles Avenue) and State Route 34 (Somis Road). However, agricultural equipment may be a dominant noise source during periods of light traffic. In addition, the Union Pacific Railroad tracks are located along Somis Road and State Route 118, and dominate the noise environment when trains pass by.

Noise sensitive receptors located in the vicinity of the proposed Phase 2 (Upper Reach) alignment include Somis Elementary School, the community of Somis, a residential area located north of State Route 118 and east of La Cumbre Road, and scattered rural residences (including caretaker dwellings). Based on the Ventura County Construction Noise Threshold Criteria, only the Somis Elementary School is considered a sensitive receptor during daytime hours (7 a.m. to 7 p.m.). All other receptors are residences that are considered sensitive receptors only during evening and nighttime hours. It should be noted that most of these residences are exposed to relatively high noise levels due to their proximity to Somis Road, State Route 118 and/or the Union Pacific Railroad tracks.

**Project Noise Measurements.** Noise monitoring was conducted to characterize the noise environment of the project area, and to determine ambient nighttime noise levels for selection of the appropriate noise threshold criteria. The results of the noise monitoring are provided in Table 5.

**Table 5. Noise Monitoring Results**

| Date             | Monitoring Period     | Location   | Population Represented                | Noise Level (dBA Leq) |
|------------------|-----------------------|--|---------------------------------------|-----------------------|
| August 22, 2012  | 1254-1314 (daytime)   | Somis, North Street (200 feet from centerline of Somis Road) | Somis and vicinity                    | 53.6                  |
| November 5, 2013 | 2200-2220 (nighttime) | Somis, North Street (170 feet from centerline of Somis Road) | Somis and vicinity                    | 50.0                  |
| November 5, 2013 | 2227-2247 (nighttime) | La Cumbre Road (335 feet from centerline of Route 118)       | Rural residences near State Route 118 | 48.7                  |

4.10.1.1 Significance Thresholds

At the time the Program EIR/EA was certified (2002), Ventura County had not developed noise thresholds specifically for short-term construction operations. However, current General Plan Policy 2.16.2-1(5) requires construction noise to be evaluated and mitigated in accordance with the Construction Noise Threshold Criteria and Control Plan prepared by Advanced Engineering Acoustics (amended 2010). Based on this document, noise-sensitive receptors include:

- Hospitals and nursing homes (sensitive 24 hours/day);
- Residences (sensitive during evening and nighttime – 7 p.m. to 7 a.m.);
- Hotels and motels (sensitive during evening and nighttime); and
- Schools, churches and libraries (daytime and evening, when in use).

Noise threshold criteria specified in the Construction Noise Threshold Criteria and Control Plan relevant to the project includes:

- Schools: daytime - 60 dBA Leq OR ambient noise level + 3 dBA (based on 2-8 weeks in proximity to receptor); evening - not applicable, not in use.
- Residences: evening – 50 dBA Leq OR ambient noise level + 3 dBA; nighttime – 45 dBA Leq OR ambient noise level + 3 dBA.

Applicable noise threshold criteria used in this analysis are 60 dBA Leq for the Somis Elementary School and the measured ambient nighttime noise level (see Table 5) + 3 dBA Leq for residences potentially affected by nighttime pipeline installation at drainage crossings. Based on measured nighttime noise levels (see Table 5), the nighttime noise threshold criteria used in this analysis is 53.0 dBA Leq (ambient + 3 dBA) for residences in/near Somis and 51.7 dBA Leq for other residences.

## 4.10.2 Impact Analysis

### 4.10.2.1 Project-Specific Impacts

**Construction Noise.** Short-term noise would be generated by heavy equipment and heavy-duty trucks associated with pipeline installation. However, the proposed project would generate substantial noise only during the construction period. Therefore, the project would not be considered a noise generator for the purposes of General Plan Policy 2.16.2-1.

During construction of the CRSMP, CMWD has implemented a variety of measures to minimize construction-related noise including the following:

- CMWD will monitor noise levels within the work area and apply additional noise mitigation measures when necessary.
- Where appropriate, backup alarms on mobile equipment may be modified to reduce potential noise impacts.
- Where nighttime operations are necessary and in the vicinity of nearby residences or other sensitive receptors, CMWD will establish a noise hotline available 24 hours per day to report noise issues near sensitive receptors.
- Signs will be posted along construction right-of-way with contact information for Project and noise hotline information.
- Where the operations are in the vicinity of sensitive receptors, a Night Operations Noise Impact Reduction Program will be implemented and will include the following measures.
  - Portable noise barriers of up to 25 feet in height will be placed between construction equipment and sensitive receptors.
  - Where micro-tunneling, jack and bore, or other trenchless operations may be necessary during evening hours, and where the operations are in the vicinity of sensitive receptors, all key power units, including generators, will be enclosed or acoustically packaged to reduce potential noise impacts.
  - Pumps and engines will be fully enclosed or acoustically packaged to reduce potential noise impacts.
  - Mixing and cleaning equipment will be partially enclosed or appropriate noise barriers placed around equipment to reduce potential noise impacts.
  - Light sets will be enclosed or acoustically packaged to reduce potential noise impacts.
  - Upgraded silencers will be placed on all applicable engines.
  - Quiet mode specifications for all evening or nighttime work from 7 pm to 7 am including use of signalers for all backup operations, minimize use of crane and pipe handling operations, and restrict materials deliveries to site.

These measures would also be implemented for the Phase 2 (Upper Reach) of the CRSMP, and are incorporated into this impact analysis.

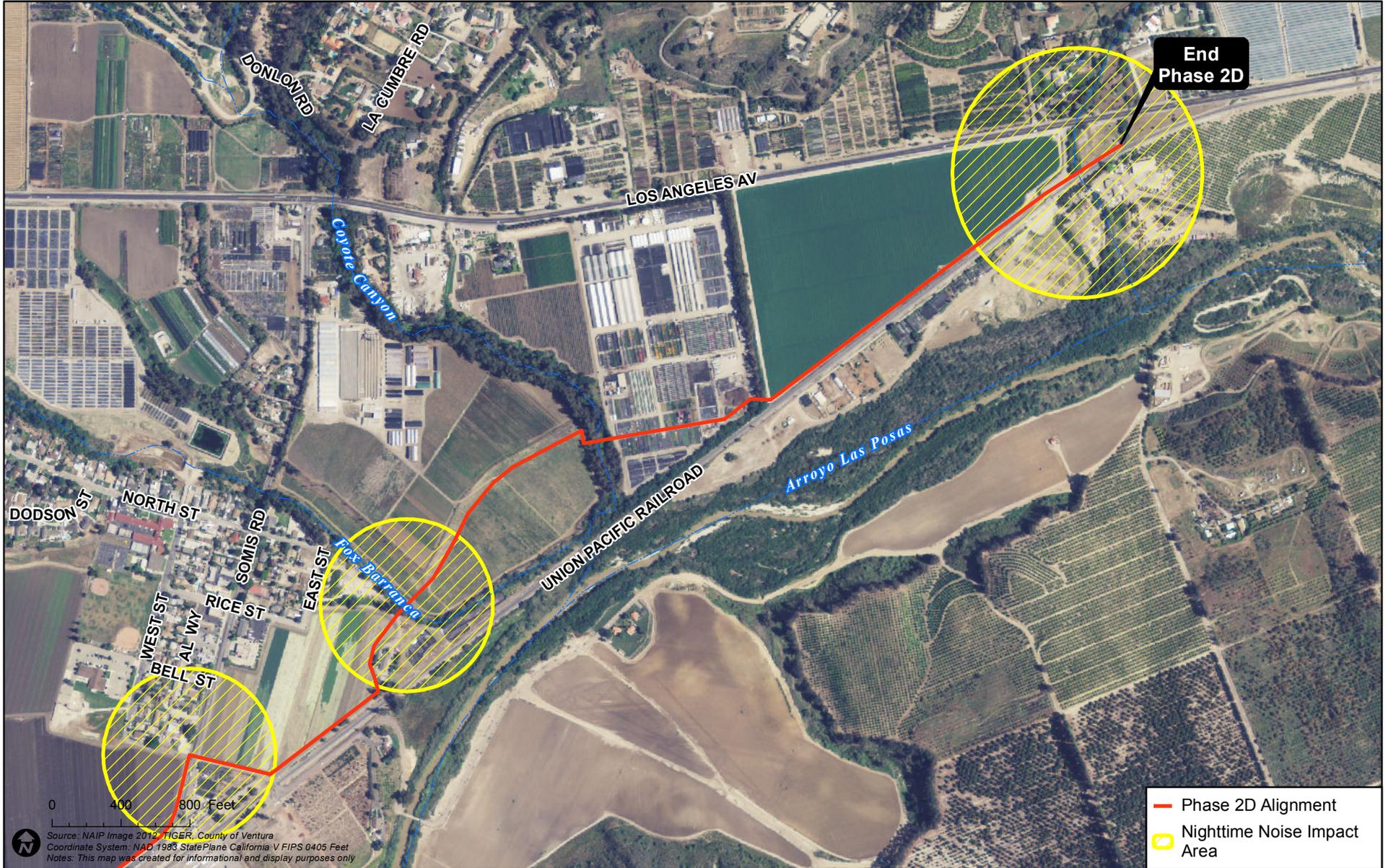
Potential noise sensitive receptors are limited to adjacent residences and the Somis Elementary School. Noise levels at adjacent sensitive receptors associated with open cut (trenched) pipeline installation, and trench-less pipeline installation were estimated using the Roadway Construction Noise Model developed by the Federal Highway Administration. Note that open cut pipeline installation is anticipated to be limited to daytime periods (7 a.m. to 7 p.m.), such that adjacent residences would be considered noise-sensitive receptors only when near trench-less pipeline installation sites where evening and/or nighttime work may be required.

The estimated peak noise level at the Somis Elementary School generated by pipeline installation is 57.5 dBA Leq, which is less than the County's 60 dBA Leq noise threshold criteria. Therefore, daytime pipeline installation noise impacts would be less than significant. As the school is not occupied at night, nighttime noise impacts do not apply.

Trench-less pipeline installation under drainages and roadways may require evening and/or nighttime work, which would generate noise levels exceeding the nighttime noise threshold criteria at nearby residences. Table 6 provides a summary of the number of residences that would be exposed to nighttime noise levels exceeding noise threshold criteria at each trench-less pipeline crossing. As shown in Table 6, incorporated noise reduction measures would substantially reduce the number of residences affected by construction noise levels above the nighttime threshold. However, approximately 25 residences could experience nighttime noise levels above the threshold, even with incorporation of noise reduction measures. Therefore, nighttime construction noise is considered a significant unavoidable impact. Figures 8 and 9 are provided to identify areas along the pipeline alignment where nighttime noise thresholds would be exceeded at residences.

**Operation Noise.** Operation of Phase 2 (Upper Reach) of the CRSMP pipeline system would be limited to inspection, exercising valves, and painting. Noise generated by pipeline operation would be limited to motor vehicles used by CMWD maintenance staff. Traffic noise increases associated with the addition of one round trip on a peak day on the local roadway network would be imperceptible and less than significant.

**Vibration.** All affected receptors are located near the Union Pacific Railroad tracks, and are exposed to ground-borne vibration as trains pass by. Pipeline installation (primarily excavation and directional drilling) would result in some ground-borne noise or vibration at adjacent residences. Due to the existing high vibration levels, no substantial project-related increase is anticipated. In addition, vibration impacts would occur for only a short time period at any one receptor (one to 8 weeks), as the pipeline is installed. Overall, vibration impacts are considered less than significant.





#### 4.10.2.2 Cumulative Impacts

Three cumulative projects are located in close proximity to the Phase 2 (Upper Reach) alignment and could affect the same noise-sensitive receptors: office addition at 3100 Somis Road, legalization of veterinarian hospital, and the four lot subdivision at La Cumbre Road. Only the four lot subdivision would involve construction noise adjacent to residences. However, such construction is anticipated to be limited to daytime hours, when residential land uses are not considered noise-sensitive receptors. Therefore, no other projects would contribute to project-specific impacts. Similar to project-specific impacts, cumulative impacts are considered significant and avoidable.

**Table 6. Summary of Residences Affected by Nighttime Construction Noise**

| Location                  | Nighttime Noise Threshold Criteria (ambient + 3 dBA) | Approximate Number of Affected Residences | Approximate Number of Affected Residences (with incorporated noise reduction measures) |
|---------------------------|--|---|--|
| <b>Drainage Crossings</b> |  |   |  |
| Fox Barranca              | 53.0   | 68  | 1  |
| Coyote Canyon             | 53.0   | 10  | 0  |
| Unnamed drainage          | 51.7   | 5   | 0  |
| Sand Canyon               | 51.7   | 38  | 6  |
| Mahan Barranca            | 51.7   | 2   | 0  |
| Long Canyon               | 51.7   | 2   | 0  |
| Hunt Wash                 | 51.7   | 4   | 0  |
| Grimes Canyon             | 51.7   | 1   | 0  |
| <b>Roadway Crossings</b>  |  |   |  |
| Somis Road                | 53.0   | 70  | 11   |
| Los Angeles Avenue        | 51.7   | 32  | 7  |
| Balcom Canyon Road        | 51.7   | 0   | 0  |
| Grimes Canyon Road        | 51.7   | 1   | 0  |
| <b>Total</b>              |  |   | <b>25</b>  |

#### 4.10.3 Mitigation Measures

All feasible construction noise reduction measures have been incorporated into the project. Therefore, additional measures are not available to further reduce nighttime noise impacts.

#### 4.10.4 Residual Impacts

Implementation of adopted construction noise reduction measures would substantially reduce nighttime construction noise. However, approximately 25 residences would be affected by nighttime construction noise above the noise threshold criteria (see Table 6). Therefore, construction noise impacts are considered significant and unavoidable.

#### 4.10.5 Consistency with 2002 Program EIR/EA

Although Alternative Alignment A is very similar to the Phase 2 (Upper Reach) alignment assessed in this document, significant construction noise impacts were not identified for segment C-D pipeline alignments in the Program EIR/EA. This is due to a more restrictive significance threshold and because current plans indicate minor drainages would be crossed by tunneling under the streambed, which was not addressed in the Program EIR/EA. Tunneling activities typically require some evening and/or nighttime work, which triggers lower noise threshold values and results in significant unavoidable noise impacts.

#### 4.11 TRANSPORTATION/CIRCULATION

##### 4.11.1 Setting

###### 4.11.1.1 Existing Conditions

The quality of traffic service provided by a roadway system can be described through the Level of Service (LOS) concept. LOS is a standardized means of describing traffic conditions by comparing traffic volumes in a roadway system with the system's capacity. An LOS rating of A, B or C indicates that the roadway is operating efficiently. Minor delays are possible on an arterial with a LOS of D. Level E represents traffic volumes at or near the capacity of the highway, resulting in possible delays and unstable flow. LOS F represents heavily congested traffic, where demand exceeds capacity and speeds vary greatly.

The Phase 2 (Upper Reach) pipeline alignment would be accessed from SR 34 (Lewis Road/Somis Road) and SR 118 (Los Angeles Avenue). Year 2012 traffic volumes provided by the California Department of Transportation (Caltrans) indicate 12,500 average daily trips occur on SR 34, and 18,400 average daily trips occur on SR 118 (east of the SR 34 intersection). Based on the Ventura County LOS thresholds for conventional state highways, SR 34 operates at LOS D and SR 118 operates at LOS E. However, the Ventura County Public Works Transportation Department noted that Somis Road operates at LOS E in their response letter to the NOP. Based on the Ventura County Initial Study Assessment Guidelines, the minimum acceptable LOS for these two roadways is LOS E.

The SR 118/SR 34 intersection currently operates at LOS F at during a.m. and p.m. peak commute hours (generally 7-8 a.m. and 5-6 p.m.), which is considered unacceptable. Note that Caltrans plans to improve this intersection, but the implementation schedule is unknown.

###### 4.11.1.2 Significance Thresholds

The following significance thresholds were taken from the Ventura County Initial Study Assessment Guidelines and have been utilized by CMWD for this project.

- Cause the existing LOS on a roadway segment to fall to an unacceptable level (LOS F in this case); and
- An increase of one peak hour trip at an intersection operating at LOS F.

### 4.11.2 Impact Analysis

#### 4.11.2.1 Project-Specific Impacts

Motor vehicle trips generated by the project would primarily occur during the construction period. Installation of the proposed pipeline would involve up to 35 heavy-duty truck round trips per day, and up to 20 worker transportation round trips per day. Since construction activity would generally occur between 7 a.m. and 4 p.m., worker transportation trips would occur prior to peak commute hour. In addition, heavy-duty truck trips would be distributed relatively evenly throughout the day. Therefore, few of these trips would occur during peak commute hour.

Project construction traffic would utilize roadways operating at acceptable LOS. Based on the relatively small number of project-related trips as compared to existing volumes, project traffic would not cause affected roadways to operate at unacceptable LOS.

However, during the construction period, the project may contribute at least one peak hour trip to the SR 118/SR 34 intersection, which currently operates at unacceptable LOS. This impact is considered potentially significant.

Project-related construction traffic would enter SR 34 and SR 118 from minor roadways and agricultural roads, which may cause safety concerns associated with potential collisions with vehicles entering the highway. However, CMWD would require the construction contractor to establish safe traffic patterns and minimize any contribution to traffic hazards.

The project has been designed to avoid direct impacts to County and State transportation facilities by installing the pipeline under roadways using trench-less methods. Therefore, disturbance of pavement and related drainage facilities would be avoided and repairs (such as pavement overlays) would not be needed.

#### 4.11.2.2 Cumulative Impacts

The cumulative projects listed in Section 3.4 are relatively small and dispersed, such that substantial traffic volume increases on regional roadways are not anticipated. However, these projects may also contribute at least one peak hour trip to the SR 34/SR 118 intersection, resulting in a significant cumulative impact. Following implementation of mitigation, the project's incremental contribution to this impact would not be cumulatively considerable.

### 4.11.3 Mitigation Measures

The intent of this mitigation measure is to offset the project-related contribution to existing traffic congestion.

- CMWD shall pay Traffic Impact Mitigation fees to the Ventura County Transportation Department based on the projected number of average daily trips and the rates (\$/trip) in effect at the time construction is implemented. These fees would be used for roadway improvements to offset the contribution of the project to level of service impacts.

#### **4.11.4 Residual Impacts**

Based on County policies, implementation of either of the two mitigation measures provided above would mitigate project traffic impacts to a level of less than significant.

#### **4.11.5 Consistency with 2002 Program EIR/EA**

Although Alternative Alignment A is very similar to the Phase 2 (Upper Reach) alignment assessed in this document, significant construction traffic impacts were not identified for segment C-D pipeline alignments in the Program EIR/EA. The original impact analysis did not consider the poor LOS of the SR 34/SR 118 intersection, which may not have been operating at LOS F at the time the Program EIR/EA was prepared.

## 5.0 ALTERNATIVES ANALYSIS

This section of the EIR provides a comparative analysis of the merits of alternatives to the proposed project pursuant to Section 15126.6 of the State CEQA Guidelines. According to the Guidelines, the discussion of alternatives should focus on alternatives to a project or its location that would feasibly meet the basic objectives of the project while avoiding or substantially lessening the significant effects of the project. The CEQA Guidelines indicate that the range of alternatives included in this discussion should be sufficient to allow decision-makers a reasoned choice between alternatives and a proposed project. The alternatives discussion should provide decision-makers with an understanding of the environmental merits and disadvantages of various project alternatives

The range of alternatives in an EIR is governed by a “rule of reason” that requires the EIR to set forth only those alternatives necessary to make a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project (CEQA Guidelines Section 15126.6 [f]). Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision-making. When addressing feasibility, the CEQA Guidelines state that “among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent).” The CEQA Guidelines also state that the alternative discussion need not be presented in the same level of detail as the assessment of the proposed project.

Therefore, based on the CEQA Guidelines, several factors need to be considered in determining the range of alternatives to be analyzed in an EIR and the level of detail of analysis that should be provided. These factors include: (1) the nature of the significant impacts of the proposed project; (2) the ability of alternatives to avoid or substantially lessen impacts associated with the project; (3) the ability of the alternatives to meet most of the basic objectives of the project; and (4) the feasibility of the alternatives.

As required by the State CEQA Guidelines, this analysis focuses on alternatives that could avoid or substantially reduce significant effects of the project. Alternatives determined to be infeasible were rejected from further consideration and are described in Section 5.2. Impacts of the alternatives considered are summarized in Section 5.3. In addition, this section identifies the environmentally superior alternative as required by the State CEQA Guidelines.

## 5.1 NO PROJECT ALTERNATIVE

This alternative consists of the continuing operation of existing facilities, including in place portions of the CRSMP and ocean outfall. The elimination of Phase 2 (Upper Reach) would render the proposed Moorpark Desalter infeasible, which would be located in Moorpark near the proposed terminus of the Phase 2 (Upper Reach) and discharge brine to the CRSMP. The desalter would treat poor quality groundwater from the South Las Posas Groundwater Basin and make it available for beneficial uses and remove salts from the watershed.

## 5.2 ALTERNATIVES CONSIDERED

The pipeline assessed in this EIR is a segment of a larger project (CRSMP, see Section 1.4), a portion of which has been constructed, including the ocean outfall and each of the pipeline segments downstream of the Phase 2 (Upper Reach) alignment. Therefore, it is not logical or economically feasible to alter the southern-most point of the Phase 2 (Upper Reach) pipeline alignment. In addition, alternative brine disposal methods and an alternative ocean outfall considered in the 2002 CRSMP Program EIR/EA are not considered feasible, as construction has occurred that would preclude implementation of these features. Therefore, alternatives considered in this EIR are limited to changes in the pipeline alignment.

The proposed pipeline alignment would be located mostly parallel to and north of the Union Pacific Railroad tracks. Two alternative pipeline alignments are considered in this analysis, and are taken from the 2002 Program EIR/EA (Segment C-D, Alternatives A and B). Alternative A would be similar to the preferred alignment, but would follow Somis Road, instead of the Union Pacific Railroad tracks to Los Angeles Avenue. Alternative B would generally follow the north bank of Arroyo Las Posas, except a central portion that would follow the Union Pacific Railroad tracks (see Figure 10).

## 5.3 IMPACTS OF THE ALTERNATIVES

### 5.3.1 No Project Alternative

This Alternative represents no action and would not have any direct impacts to the environment, including aesthetics, agriculture, air quality, biological resources, cultural resources, geology, greenhouse gas emissions, hazards, water resources, noise and transportation. However, the elimination of Phase 2 (Upper Reach) of the CRSMP would also eliminate a critical brine disposal method needed in the Calleguas Creek watershed, and may indirectly affect future water supplies that include treated groundwater.

The 2010 Urban Water Management Plan prepared for Ventura County Waterworks District No. 1 (serving the City of Moorpark and surrounding areas) includes the proposed Moorpark Desalter as a source of 5,000 acre-feet/year of treated groundwater. This groundwater would be a reliable local water supply, and reduce the need for imported water. This desalter would not be feasible if Phase 2 (Upper Reach) of the CRSMP is not constructed, as a disposal method for brine is essential.

The 2010 Urban Water Management Plan prepared for Ventura County Waterworks District No. 8 (serving the City of Simi Valley, in part) notes that the CRSMP will enable the District to pursue additional groundwater pumping projects that are currently infeasible given the cost and difficulty in brine disposal. The 2010 Urban Water Management Plan is relying on a conservation program to meet year 2020 water demands, as projected water usage (28,152 acre-feet/year) is anticipated to exceed supply (26,861 acre-feet/year). Without Phase 2 (Upper Reach) and its connection to future Phase 3 of the CRSMP, the City of Simi Valley's water supply may be adversely affected.

### **5.3.2 Alternative A Pipeline Alignment**

#### **5.3.2.1 Aesthetics**

The Alternative A pipeline alignment includes a greater distance along Los Angeles Avenue, an eligible scenic highway. Therefore, pipeline installation activities (vegetation, removal, soil stockpiles, heavy equipment activity) would result in greater temporary impacts to motorist views from Los Angeles Avenue, as compared to the preferred alternative. Similar to the preferred alignment, this impact would be less than significant.

#### **5.3.2.2 Agricultural and Forestry Resources**

Consistent with the preferred alignment, Alternative A would not result in conversion of farmland or forest land, but construction-related soil disturbance and temporary loss of agricultural production would occur. Alternative A would traverse additional developed areas (Somis) as compared to the preferred alternative. Therefore, disturbance of Prime Farmland and loss of agricultural production would be reduced. Similar to the preferred alignment, this impact would be less than significant.

#### **5.3.2.3 Air Quality & Greenhouse Gas Emissions**

Consistent with the preferred alignment, with incorporation of emissions reduction measures recommended by the APCD, Alternative A would not result in significant air quality impacts. However, the Alternative A alignment would be slightly longer than the preferred alignment, and result in greater total construction pollutant emissions and total greenhouse gas emissions. It is anticipated that peak day air pollutant and greenhouse gas emissions would be the same as the preferred alignment.

#### **5.3.2.4 Biological Resources**

Alternative A would be located along roadways, and loss of vegetation and wildlife habitat would be limited to drainage crossings. Similar to the preferred alignment, it is anticipated that drainage crossings would use trench-less methods, substantially reducing loss of vegetation and wildlife habitat. As with the preferred alignment, these impacts would be less than significant. However, impacts to nesting migratory birds and raptors would be potentially significant.

#### 5.3.2.5 Cultural Resources

Alternative A has the potential to disturb one prehistoric archeological site (CA-VEN-1089), one historic archeological site (CA-VEN-661H), and three County landmarks (on Somis Road). It is anticipated that impacts to the archeological sites would be mitigated similar to the preferred alignment, and the County landmarks could be avoided. However, cultural resource impacts may be greater than for the preferred alignment.

#### 5.3.2.6 Geology and Soils

The Alternative A alignment would traverse the same soil series and be exposed to the same seismic conditions as the preferred alignment. Similar to the preferred alignment, geology and soils impacts would be less than significant.

#### 5.3.2.7 Hazards and Hazardous Materials

The Alternative A alignment would be exposed to the same hazards as the preferred alignment, but would be located within 450 feet of Somis Elementary (closer than the preferred alignment). Therefore, hazardous emissions impacts associated with diesel particulate matter near the school would be greater, but still less than significant. Alternative A would cross the same drainages as the preferred alignment and would implement the same measures to avoid risk of upset impacts (storm-related discharge to surface water). Alternative A would traverse additional areas mapped as a Moderate Fire Severity Hazard; however, a significant increase in risk of loss, injury or death from wildland fires is not anticipated.

#### 5.3.2.8 Hydrology and Water Quality

Alternative A would involve the same drainage crossings, and use about the same amount of water for construction. Similar to the preferred alignment, pipeline crossings of drainages would be completed using trench-less methods. Consistent with the preferred alignment, construction-related impacts to surface water quality are considered less than significant. The pipeline would be located within the regulated 100-year floodplain at some of the drainage crossings. However, similar to the preferred alignment, the pipeline would be fully buried and would not impede floodwaters or cause an increase in floodwater elevation.

#### 5.3.2.9 Noise

The Alternative A alignment would require crossing Fox Barranca within the community of Somis, which would result in nighttime construction noise impacts to a greater number of residences. Although project incorporated noise reduction measures would substantially reduce noise levels, approximately 20 additional residences would be exposed to noise levels above the noise threshold criteria, as compared to the preferred alternative. In addition, the Alternative A alignment is closer to the residential area located north of State Route 118 and east of La Cumbre Road, and evening and nighttime pipeline installation activities at the Sand Canyon drainage would impact additional residences. These construction noise impacts would be significant and unavoidable, and greater than the preferred alternative.

#### 5.3.2.10 Transportation/Circulation

This Alternative would involve the same traffic impacts as the preferred alternative, including contributing at least one peak hour trip to the SR 34/SR 118 intersection. However, the Alternative A alignment is located in close proximity to the SR 34/SR 118 intersection, and pipeline installation may involve short-term lane closure and related construction activity that would exacerbate traffic congestion at this intersection. Therefore, transportation impacts may be greater under Alternative A.

### 5.3.3 Alternative B Pipeline Alignment

#### 5.3.3.1 Aesthetics

The Alternative B pipeline alignment includes only 0.6 miles along Los Angeles Avenue, an eligible scenic highway. Therefore, pipeline installation activities (vegetation, removal, soil stockpiles, heavy equipment activity) would result in lesser temporary impacts to motorist views from Los Angeles Avenue, as compared to the preferred alternative. Similar to the preferred alignment, this impact would be less than significant.

#### 5.3.3.2 Agricultural and Forestry Resources

Consistent with the preferred alignment, Alternative B would not result in conversion of farmland or forest land, but construction-related soil disturbance and temporary loss of agricultural production would occur. Alternative B would traverse additional developed areas (Moorpark Wastewater Treatment Plant) and non-farmlands along Arroyo Las Posas as compared to the preferred alternative. Therefore, disturbance of Prime Farmland and loss of agricultural production would be reduced. Similar to the preferred alignment, this impact would be less than significant.

#### 5.3.3.3 Air Quality & Greenhouse Gas Emissions

Consistent with the preferred alignment, with incorporation of emissions reduction measures recommended by the APCD, Alternative B would not result in significant air quality impacts. However, the Alternative B alignment would be slightly longer than the preferred alignment, and result in greater total construction pollutant emissions and total greenhouse gas emissions. It is anticipated that peak day air pollutant and greenhouse gas emissions would be the same as the preferred alignment.

#### 5.3.3.4 Biological Resources

Alternative B would be located along the north bank of Arroyo Las Posas for about 3.3 miles. Based on a 55 foot-wide disturbance corridor, temporary loss of riparian vegetation during pipeline installation may be as high as 22 acres. In addition, protection of the pipeline along the stream bank may be required and result in permanent loss of riparian vegetation. The loss of riparian vegetation, wetlands and habitat for special-status species would be considered significant impacts, not shared with the preferred alignment. It is anticipated that these impacts could be mitigated in the long-term by habitat restoration; however, short-term impacts may not be entirely mitigable. Impacts to nesting migratory birds and raptors would also be significant, and greater than the preferred alignment.

#### 5.3.3.5 Cultural Resources

Alternative B has the potential to disturb two prehistoric archeological sites (CA-VEN-1089 and CA-VEN-864). It is anticipated that impacts to the archeological sites would be mitigated similar to the preferred alignment, and cultural resource impacts would be virtually the same.

#### 5.3.3.6 Geology and Soils

The Alternative B alignment would traverse sandy alluvial land adjacent to Arroyo Las Posas and may be more susceptible to seismic-induced liquefaction as compared to the preferred alignment. Consistent with the preferred alignment, the pipeline would be designed and installed to withstand liquefaction. Similar to the preferred alignment, geology and soils impacts would be less than significant.

#### 5.3.3.7 Hazards and Hazardous Materials

The Alternative B alignment would be exposed to the same hazards as the preferred alignment, but would be located within 0.3 miles of Somis Elementary (further than the preferred alignment). Therefore, hazardous emissions impacts associated with diesel particulate matter near the school would be reduced and less than significant. Alternative B would be located adjacent to Arroyo Las Posas for about 3.3 miles; therefore, risk of upset impacts (storm-related discharge to surface water) would be greater, and may not be entirely mitigable. Alternative B would traverse additional areas mapped as a Moderate Fire Severity Hazard and areas mapped as High Fire Severity Hazard; however, a significant increase in risk of loss, injury or death from wildland fires is not anticipated.

#### 5.3.3.8 Hydrology and Water Quality

Alternative B would involve the same drainage crossings, and use about the same amount of water for construction. Similar to the preferred alignment, pipeline crossings of drainages would be completed using trench-less methods. Consistent with the preferred alignment, construction-related impacts to surface water quality are considered less than significant. The pipeline would be located within the regulated 100-year floodplain at some of the drainage crossings and some areas along Arroyo Las Posas. However, similar to the preferred alignment, the pipeline would be fully buried and would not impede floodwaters or cause an increase in floodwater elevation.

#### 5.3.3.9 Noise

Implementation of the Alternative B alignment would involve trench-less pipeline crossings adjacent to Arroyo Las Posas and further from residential areas, as compared to the preferred alternative. This greater distance would result in lower evening and nighttime construction noise levels, and reduce the number of residences significantly impacted. Although project incorporated noise reduction measures would substantially reduce noise levels, at least one residence would be exposed to nighttime noise levels above the noise threshold criteria. These construction noise impacts would be significant and unavoidable, but less than the preferred alternative.

#### 5.3.3.10 Transportation/Circulation

This Alternative would be located along Arroyo Las Posas and not along roadways, such that pipeline crossings of roadways would not be required. However, Alternative B would likely contribute at least one peak hour trip to the SR 34/SR 118 intersection. Similar to the preferred alignment, this impact is considered significant.

### 5.4 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Alternative alignments A and B are considered feasible and would meet all of the overall CRSMP objectives. However, Alternative B would be more costly to construct and maintain due to its greater length, and have a greater potential for storm damage due to its location adjacent to Arroyo Las Posas.

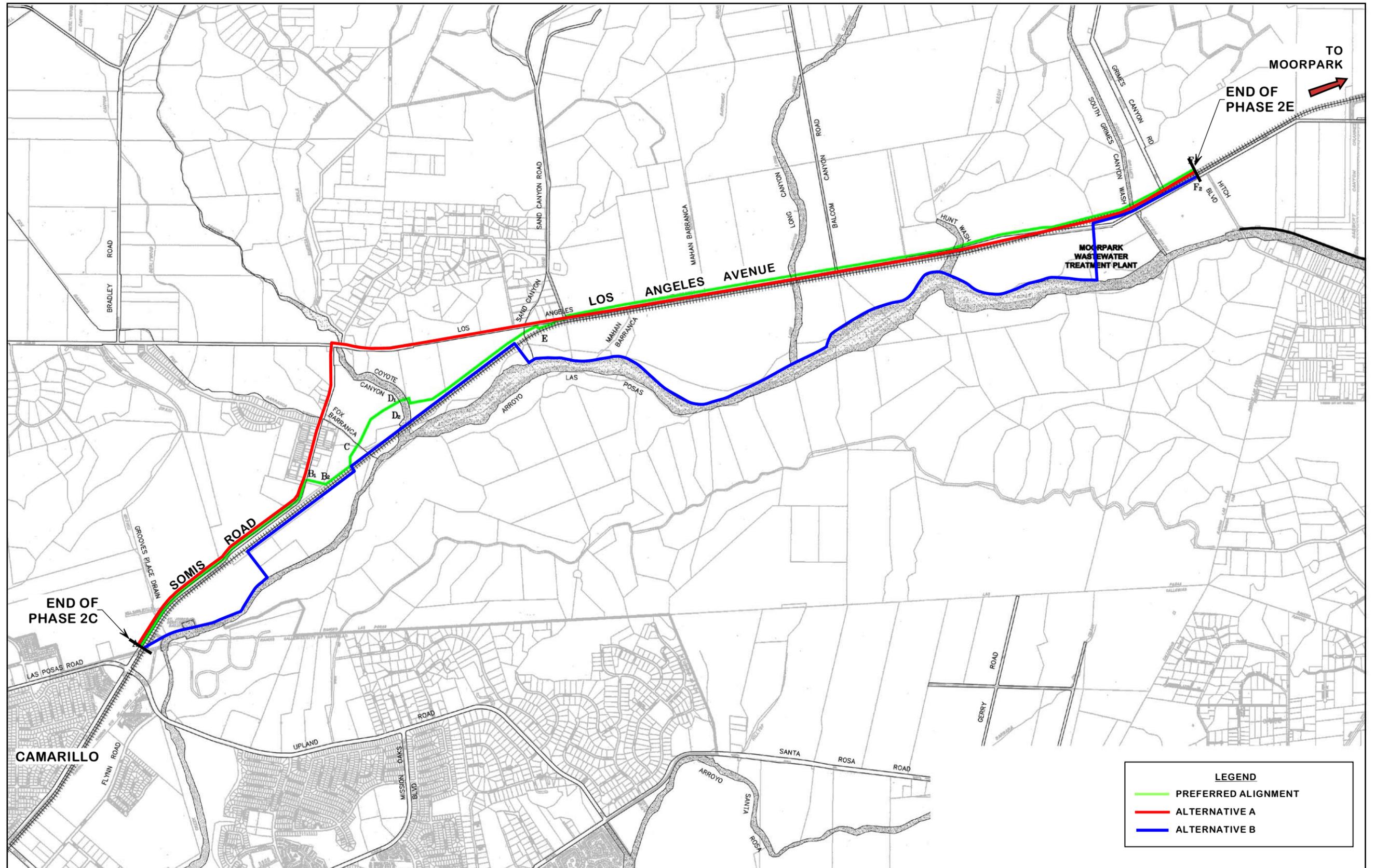
Section 15126.6(e)(2) of the State CEQA Guidelines requires identification of the environmentally superior alternative. Table 7 provides a summary of the relative impacts of the alternative pipeline alignments. The No Project Alternative would avoid direct impacts, but may adversely affect municipal water supplies augmented by treated groundwater, as it would severely limit brine disposal options. In addition, the No Project Alternative would prevent the achievement of the objectives of the CRSMP in the upper watershed, including enabling development of new water sources, management of high salinity groundwater, and disposal of brine.

Environmental impacts associated with the preferred alignment would be lower in magnitude than the alternative alignments. Therefore, the preferred alignment is the environmentally superior alternative.

**Table 7. Comparison of the Impacts of the Alternatives**

| Issue Area                    | Preferred Alignment | Alternative A | Alternative B |
|-------------------------------|---------------------|---------------|---------------|
| Aesthetics                    | LS                  | LS+           | LS-           |
| Agriculture                   | LS                  | LS-           | LS-           |
| Air quality                   | LS                  | LS+           | LS+           |
| Biological resources          | LSM                 | LSM           | <b>PS</b>     |
| Cultural resources            | LSM                 | LSM+          | LSM           |
| Geology and soils             | LS                  | LS            | LS+           |
| Greenhouse gas emissions      | LS                  | LS+           | LS+           |
| Hazards & hazardous materials | LS                  | LS+           | <b>PS</b>     |
| Hydrology & water quality     | LS                  | LS            | LS+           |
| Noise                         | <b>PS</b>           | <b>PS+</b>    | <b>PS-</b>    |
| Transportation                | LSM                 | LSM+          | LSM           |

- LS Less than significant
- LSM Less than significant with mitigation
- PS Potentially significant and unmitigable
- + Greater than the preferred alignment
- Less than the preferred alignment



SOURCE: Perliter & Ingalsbe - 2010



## 6.0 GROWTH INDUCEMENT

The *State CEQA Guidelines* require that an EIR assess the growth-inducing impacts of a project, particularly the potential for a project to:

". . . foster economic or population growth or the construction of new housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth."

In California, water supply may limit population growth and projects that increase water supplies may be viewed as growth inducing. The Phase 2 (Upper Reach) pipeline would be an integral part of a regional pipeline system that would provide a means for disposal of brine (ocean discharge), which would facilitate the treatment and use of poor quality groundwater. The Phase 2 (Upper Reach) pipeline would facilitate the future connection of the South Las Posas Basin Regional Desalter (serving the Moorpark area) to the existing Salinity Management Pipeline, and may facilitate construction of Phase 3, which would extend to Simi Valley and the proposed West Simi Desalter.

The source of potable water for the City of Moorpark and surrounding areas is 22 percent local groundwater, and 78 percent imported water supplied by CMWD. The proposed Moorpark Desalter would treat approximately 5,000 acre-feet/year of poor quality groundwater, which would provide a reliable source of local groundwater, and reduce the need for imported water. The principal source of water in Simi Valley is imported from the State Water Project, and supplied by CMWD. The City of Simi Valley would also like to reduce their dependence on imported water.

The proposed pipeline system will serve as an incentive to water providers serving the cities of Moorpark and Simi Valley to increase the use of local water sources (treated groundwater and reclaimed wastewater). However, the CMWD 2010 Urban Water Management Plan indicates that very little surplus water would be available in future years, even if additional recycled water and treated groundwater were used to supplement potable supplies. Therefore, a project-related increase in potable water availability is not expected to result in population growth beyond currently forecast levels. Overall, the potential to induce population growth and its related impacts is considered a less than significant impact.

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## **APPENDIX A**

### **NOTICE OF PREPARATION AND INITIAL STUDY**



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October 16, 2013

## **NOTICE OF PREPARATION**

### **of a Draft Environmental Impact Report for Phase 2 (Upper Reach) of the Regional Salinity Management Project**

The Calleguas Municipal Water District (CMWD) is the Lead Agency and will prepare an Environmental Impact Report addressing the potentially significant environmental impacts of the subject project. The document will also assess the potential environmental impacts of several alternatives, and provide mitigation measures as needed to reduce impacts to a level of less than significant.

The purpose of this Notice of Preparation (NOP) is to inform interested persons and affected agencies and to solicit comments as to the scope and content of the EIR. Responsible agencies will need to use the EIR prepared by the lead agency when considering any approvals for the project. Therefore, CMWD needs to know the views of your agency as to the scope and content of environmental information germane to your agencies statutory responsibilities in connection with the proposed project. A project description and initial study checklist are attached for your review. Due to uncertainty regarding the Phase 2E alignment, CMWD plans to prepare a program EIR for Phase 2 (Upper Reach), with Phase 2D analyzed at project level of detail.

Due to the time limits mandated by State law, your response must be sent at the earliest possible date, but not later than 30 days after receipt of this NOP. Comments on this NOP should provide specific detail as to the scope and content of the EIR. Responsible and trustee agencies should limit comments to issues within the limits of their jurisdiction.

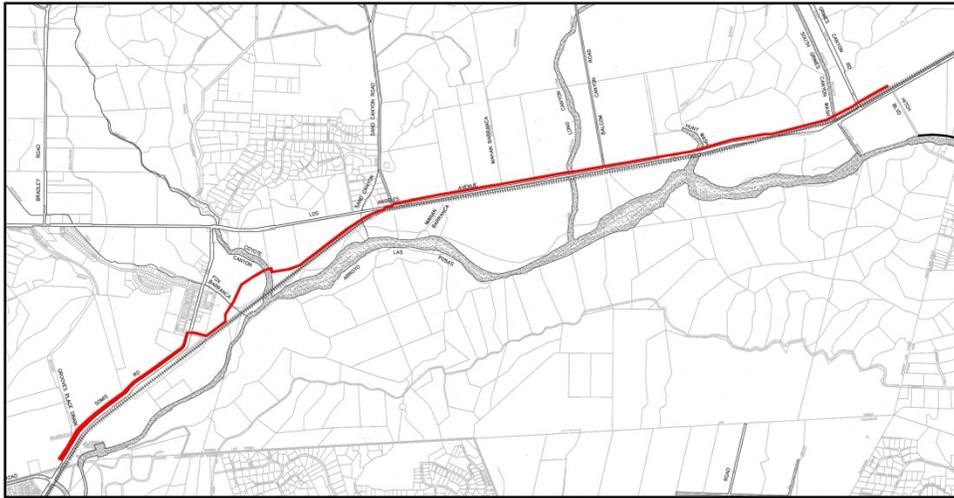
Please submit comments to:

Mr. Eric Bergh  
Calleguas Municipal Water District  
2100 Olsen Road  
Thousand Oaks, California 91360

For further information, please call 805-579-7128 or send e-mail to [ebergh@calleguas.com](mailto:ebergh@calleguas.com).

# DRAFT INITIAL STUDY

## REGIONAL SALINITY MANAGEMENT PIPELINE PHASE 2: UPPER REACH



Lead Agency:

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**October 2013**

Project No. 1102-1921



## TABLE OF CONTENTS

|  | <b>Page</b> |
|--|-------------|
| 1.0 PROJECT DESCRIPTION .....                          | 1           |
| 1.1 Project Background .....                           | 1           |
| 1.2 Project Elements .....                             | 2           |
| 1.3 Construction .....                                 | 3           |
| 1.4 Operation.....                                     | 3           |
| 2.0 ENVIRONMENTAL IMPACT ANALYSIS .....                | 10          |
| 2.1 Aesthetics .....                                   | 10          |
| 2.2 Agricultural and Forestry Resources .....          | 11          |
| 2.3 Air Quality .....                                  | 12          |
| 2.4 Biological Resources .....                         | 12          |
| 2.5 Cultural Resources .....                           | 13          |
| 2.6 Geology and Soils .....                            | 14          |
| 2.7 Greenhouse Gas Emissions.....                      | 15          |
| 2.8 Hazards and Hazardous Materials/Risk of Upset..... | 16          |
| 2.9 Hydrology and Water Quality.....                   | 17          |
| 2.10 Land Use and Planning .....                       | 18          |
| 2.11 Mineral Resources .....                           | 19          |
| 2.12 Noise .....                                       | 19          |
| 2.13 Population and Housing .....                      | 20          |
| 2.14 Public Services.....                              | 21          |
| 2.15 Recreation .....                                  | 22          |
| 2.16 Transportation/Circulation .....                  | 22          |
| 2.17 Utilities and Service Systems .....               | 23          |

## TABLE OF CONTENTS (CONTINUED)

### FIGURES

|          |  |   |
|----------|--|---|
| Figure 1 | Regional Map .....   | 4 |
| Figure 2 | Salinity Management Pipeline Phase 2 (Upper Reach) Alignment ..... | 5 |
| Figure 3 | Salinity Management Pipeline Phase 2D Alignment - West .....       | 6 |
| Figure 4 | Salinity Management Pipeline Phase 2D Alignment - East .....       | 7 |
| Figure 5 | Salinity Management Pipeline Phase 2E Alignment - West .....       | 8 |
| Figure 6 | Salinity Management Pipeline Phase 2E Alignment - East .....       | 9 |

## **1.0 PROJECT DESCRIPTION**

### **1.1 PROJECT BACKGROUND**

The proposed project is a component of the Calleguas Municipal Water District's (CMWD) Regional Salinity Management Project (RSMP), which was the subject of a Program EIR/EA, dated August 2, 2002 (SCH no. 2000101104 and EA number 01-LC-007). The RSMP is located within the Calleguas Creek Watershed (watershed) (see Figures 1 and 2), which faces a number of environmental challenges involving both surface and groundwater resources. One of these environmental issues is the presence of increasing salinity levels within the watershed.

The CMWD, working with other public water and wastewater agencies, is undertaking the design and construction of a regional project to manage high salinity water use and disposal. The RSMP consists of an approximately 32-mile pipeline system that would collect treated wastewater and brine concentrates from wastewater treatment plants, brackish groundwater desalters (both municipal and agricultural), and industrial operations located within the Calleguas Creek watershed, then convey the effluent to other areas for direct use or to an ocean outfall for discharge. This is expected to result in substantial improvements in water quality of affected creeks and groundwater supplies. For additional information regarding the RSMP please refer to the original CMWD – RSMP Final Program EIR/EA (August, 2002).

The RSMP pipeline system includes three phases of construction, generally progressing upstream. Phase 1 of the RSMP included the pipeline from the Camrosa Water Reclamation Facility in southwestern Ventura County to an ocean outfall in the City of Port Hueneme. Phase 1 of the RSMP was divided into sub-phases 1A through 1E for construction and design purposes. Phase 1E was the subject of an Environmental Impact Report (SCH no. 2007021026) because the selected ocean outfall was not addressed in the 2002 Program EIR/EA.

Phase 2 (Lower Reach) of the RSMP included approximately 6.6 miles of pipeline, north from the Camrosa Water Reclamation Facility, generally along Lewis Road, to a point just north of Las Posas Road. Phase 2 (Lower Reach) of the RSMP was divided into sub-phases 2A through 2C for construction and design purposes. The revised pipeline alignment and other features of Phases 2A, 2B and 2C were addressed in a Mitigated Negative Declaration (SCH no. 2009121083) prepared in 2009. Currently, Phases 2D and 2E (i.e., Upper Reach) are under design and are the subject of environmental review.

The alignment for Phase 3 of the RSMP has yet to be determined. At this time, two general alignments are under review. One includes an extension of the Phase 2 alignment eastward through the City of Moorpark to an undetermined point within the City of Simi Valley. The other alignment under consideration includes a pipeline from Phase 2C in the City of Camarillo eastward through the Santa Rosa and Tierra Rejada Valleys to an undetermined point within the City of Simi Valley. A preferred alignment for Phase 3 of the RSMP will be determined following discussions with probable dischargers.

## 1.2 PROJECT ELEMENTS

Phase 2 (Upper Reach) of the RSMP represents pipeline segment C-D (less about one mile between Adolfo Road and Las Posas Road, and about 2,500 feet further east of Grimes Canyon) as detailed in the 2002 Program EIR/EA. The Phase 2 (Upper Reach) pipeline alignment extends along Somis Road, the Union Pacific Railroad tracks and Los Angeles Avenue (State Route 118), from approximately 400 feet east of the Somis Road/Las Posas Road intersection to approximately 1,000 feet east of the Los Angeles Avenue/Grimes Canyon Road intersection (see Figure 2). This alignment is very similar to the Alternative A alignment addressed in the 2002 Program EIR/EA, except the currently proposed pipeline alignment would cross agricultural land instead of following Somis Road to Los Angeles Avenue (see Figure 2). The proposed alignment is about 0.2 miles shorter than the Alternative A alignment addressed in the 2002 Program EIR/EA.

Characteristics of the currently proposed Phase 2 (Upper Reach) pipeline include:

- Approximately 28,800 feet long (5.5 miles);
- 24 inches in diameter;
- The pipeline alignment is located primarily within agricultural fields on private property, outside the public right-of-way of Somis Road and Los Angeles Avenue;
- The pipeline would cross five public roadways (Somis Road, Los Angeles Avenue, Sand Canyon Road, Balcom Canyon Road and Grimes Canyon Road); and
- The pipeline would cross eight intermittent drainages (Groves Place Drain, Fox Barranca, Coyote Canyon, Sand Canyon, Mahan Barranca, Long Canyon, Hunt Wash, Grimes Canyon).

The Phase 2 (Upper Reach) alignment has been divided into two sub-phases (2D and 2E) for the purposes of engineering design. Phase 2D begins just north of Somis Road, approximately 400 feet east of the Las Posas Road/Somis Road intersection, at the end of Phase 2C. Phase 2D extends along the north side of Somis Road and the Union Pacific Railroad tracks, approximately 12,840 feet, and ends about 450 feet southeast of the Route 118 crossing (see Figures 3 and 4). Phase 2E would cross to the north side of Route 118 and traverse agricultural lands eastward to Hitch Boulevard (see Figures 5 and 6).

**It is important to note that the Phase 2E pipeline alignment as shown in the Figures 5 and 6, and described above, represents a 300-foot-wide environmental assessment corridor, to allow for minor changes in the alignment to avoid utilities, levees, roadways and other structures. However, the actual width of disturbance would generally be less than 75 feet.**

### **1.3 CONSTRUCTION**

The Phase 2 (Upper Reach) pipeline would be constructed of one or a combination of materials including polyvinyl chloride and high density polyethylene, typically delivered and installed in 20 to 50-foot-long sections.

Construction would be primarily limited to normal working hours 8 to 10 hours per day, between the hours of 7 a.m. and 7 p.m., Monday through Friday, with occasional work on Saturday. However, evening or night work may be required for installation of trenchless (tunneling) pipeline crossings, and in areas where traffic conditions require non-traditional working hours. It is anticipated that typical pipeline installation rates would be approximately 80 to 200 feet per day.

Installation of Phase 2 (Upper Reach) would be restricted to the rights-of-way approved by the applicable landowner or agency. All roadways disturbed during pipeline installation would be restored following construction. Generally, trench spoils would be temporarily stockpiled within the construction easement then backfilled to the trench after pipeline installation or hauled away to a disposal site.

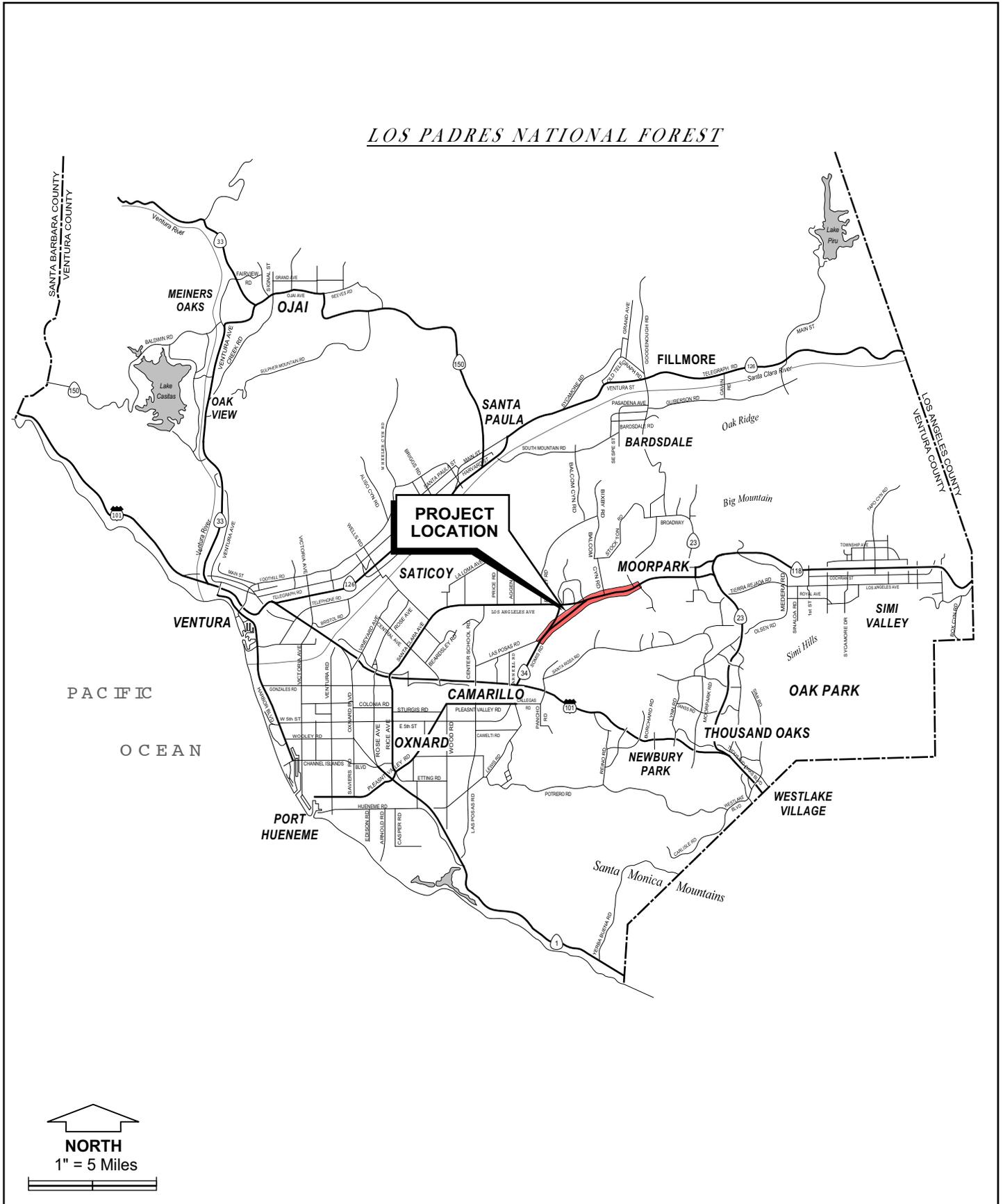
Based upon an installation rate of approximately 80 to 200 feet per day, the average amount of excess spoils requiring removal would be approximately 100 to 200 cubic yards per day. This would require approximately 10 to 20 truck trips per day per construction crew. The average daily number of trucks hauling material to and from a typical construction crew (including the delivery of pipe sections, miscellaneous supplies, hauling of imported sand and removal of excess spoils) would be approximately 35 truck trips per day.

Staging would be dependent upon the contractor and subcontractors. Typically, pipe material would be brought to the site ahead of construction and staged along the alignment. Equipment and other construction materials may require a storage site. If the contractor is local, they may stage equipment and materials in their own yard. Alternately and in the case of contractors from outside of the area, staging would likely be accomplished at strategic locations on leased land or within permitted areas along selected alignments of the pipeline.

Pipeline installation at creek crossings would primarily be conducted using trench-less methods, such as horizontal directional drilling, boring and jacking, micro tunneling or similar methods. Typical crossings would involve the construction of pits on each side of the crossing, and use of a machine to bore a horizontal hole under the structure, road, or creek, then a steel casing is inserted into the hole, or the pipeline is directly inserted into the hole. If a casing is used, pipeline segments are installed into the casing and connected to the in-place segments of pipeline on either side of the crossing.

### **1.4 OPERATION**

Operation of Phase 2 (Upper Reach) of the RSMP pipeline system would be limited to monitoring of flow rates and occasional maintenance (inspection, flow meter maintenance, minor leak repair).



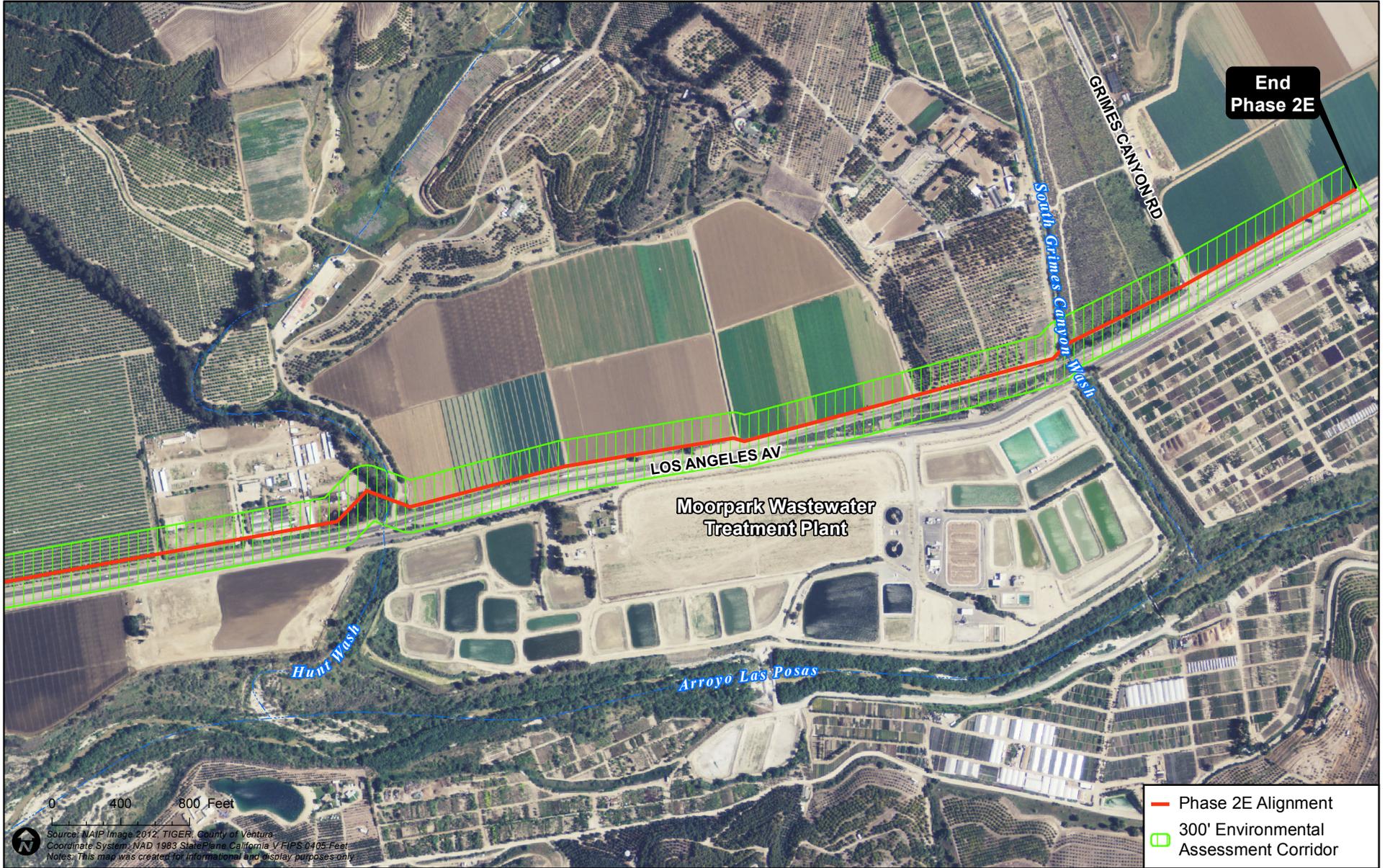












## 2.0 INITIAL STUDY CHECKLIST

This checklist provides a preliminary analysis of the potential environmental impacts associated with the proposed project. The analysis is organized by environmental issue area (e.g., aesthetics, agricultural resources, air quality). Each issue area begins with its own checklist, which identifies criteria that have been used to assess the significance or insignificance of each potential impact. The checklists used in this Initial Study were taken from the 2011 update to the State CEQA Guidelines prepared by the Association of Environmental Professionals. The checklists also indicate the conclusions made regarding the potential significance of each impact. Potentially significant impacts are identified that will be addressed in the Environmental Impact Report (EIR).

Impact classifications used in the checklists are the following:

- **Potentially Significant Impact.** An impact that could be significant, and requires further study in an Environmental Impact Report.
- **Less than Significant Impact with Mitigation.** An impact that is potentially significant, but can feasibly be mitigated to a less than significant level with measures identified in the Initial Study.
- **Less than Significant Impact.** An impact that would not be significantly adverse.
- **No Impact.** Applied when the project would not result in any impact to a specific issue area.

### 2.1 AESTHETICS

| Would the project:  | Potentially Significant Impact | Less than Significant Impact with Mitigation | Less than Significant Impact        | No Impact                           |
|---|--------------------------------|--|-------------------------------------|-------------------------------------|
| <b>a.</b> Have a substantial adverse effect on a scenic vista?  | <input type="checkbox"/>       | <input type="checkbox"/>                     | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| <b>b.</b> Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? | <input type="checkbox"/>       | <input type="checkbox"/>                     | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| <b>c.</b> Substantially degrade the existing visual character or quality of the site and its surroundings?  | <input type="checkbox"/>       | <input type="checkbox"/>                     | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| <b>d.</b> Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?                                    | <input type="checkbox"/>       | <input type="checkbox"/>                     | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

The proposed pipeline alignment is primarily located in agricultural areas (row crops, orchards and some greenhouses) near roadways. Much of the proposed pipeline alignment is visible from Los Angeles Avenue, an eligible County scenic highway. Pipeline installation would require the temporary removal of row crops and several rows of orchard trees, and possibly some landscaping trees on properties along the alignment. Tree removal at most drainage crossings would be minimized by trenchless pipe installation under the drainage. The project is not anticipated to result in significant impacts related to aesthetics; however, additional discussion will be provided in the EIR.

**2.2 AGRICULTURAL AND FORESTRY RESOURCES**

| Would the project:   | Potentially Significant Impact | Less than Significant Impact with Mitigation | Less than Significant Impact | No Impact                           |
|--|--------------------------------|--|------------------------------|-------------------------------------|
| a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? | <input type="checkbox"/>       | <input type="checkbox"/>                     | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |
| b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?   | <input type="checkbox"/>       | <input type="checkbox"/>                     | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |
| c. Conflict with existing zoning for, or cause rezoning of forest land or timberland?  | <input type="checkbox"/>       | <input type="checkbox"/>                     | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |
| d. Result in the loss of forest land or conversion of forest land to non-forest use?   | <input type="checkbox"/>       | <input type="checkbox"/>                     | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |
| e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?  | <input type="checkbox"/>       | <input type="checkbox"/>                     | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |

Approximately 84 percent of the proposed pipeline alignment would traverse prime farmland, farmland of state-wide importance and unique farmland. Agricultural uses along the pipeline alignment include row crops, orchards (mostly citrus) and greenhouses (mostly hot house berries). Temporary pipeline construction easements and permanent pipeline operation easements within agricultural areas would be returned to agricultural uses following pipeline installation. Therefore, the proposed project would not result in the conversion of farmland to non-agricultural use.

Pipeline installation would temporarily displace agricultural crops and may reduce access to other crops due to open trenches. However, displacement of crops would be limited to a 55-foot-wide construction corridor over a period of a few months. Crops affected are mostly short-rotation row crops, such that the pipeline alignment could be planted soon after construction is complete, minimizing loss of production. Loss of productivity is not considered substantial because areas affected would be relatively small and the duration of effects would be short. The project is not anticipated to result in significant impacts related to agricultural or forestry resources; however, additional discussion will be provided in the EIR.

**2.3 AIR QUALITY**

| Would the project:   | Potentially Significant Impact | Less than Significant Impact with Mitigation | Less than Significant Impact        | No Impact                |
|--|--------------------------------|--|-------------------------------------|--------------------------|
| a. Conflict with or obstruct implementation of the applicable air quality plan?  | <input type="checkbox"/>       | <input type="checkbox"/>                     | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?   | <input type="checkbox"/>       | <input checked="" type="checkbox"/>          | <input type="checkbox"/>            | <input type="checkbox"/> |
| c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors)? | <input type="checkbox"/>       | <input checked="" type="checkbox"/>          | <input type="checkbox"/>            | <input type="checkbox"/> |
| d. Expose sensitive receptors to substantial pollutant concentrations?   | <input type="checkbox"/>       | <input type="checkbox"/>                     | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| e. Create objectionable odors affecting a substantial number of people?  | <input type="checkbox"/>       | <input type="checkbox"/>                     | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Fugitive dust would be generated by the operation of heavy equipment and off-road use of motor vehicles during pipeline installation. Exhaust emissions would be generated during the construction phase by heavy equipment, heavy-duty trucks and construction worker passenger vehicles. Peak day construction emissions would likely exceed the 25 pounds per day oxides of nitrogen (NO<sub>x</sub>) threshold established by the Ventura County Air Pollution Control District. A few rural residences are located in proximity of the Phase 2 (Upper Reach) alignment, and diesel exhaust odors from construction equipment may be considered objectionable. The project is anticipated to result in potentially significant air quality impacts, which will be fully addressed in the EIR.

**2.4 BIOLOGICAL RESOURCES**

| Would the project:   | Potentially Significant Impact | Less than Significant Impact with Mitigation | Less than Significant Impact | No Impact                |
|--|--------------------------------|--|------------------------------|--------------------------|
| a. 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 or U.S. Fish and Wildlife Service? | <input type="checkbox"/>       | <input checked="" type="checkbox"/>          | <input type="checkbox"/>     | <input type="checkbox"/> |

|  |                          |                                     |                                     |                                     |
|--|--------------------------|-------------------------------------|-------------------------------------|-------------------------------------|
| <p><b>b.</b> 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 California Department of Fish and Game or US Fish and Wildlife Service?</p>                     | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| <p><b>c.</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, hydrological interruption, or other means?</p> | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| <p><b>d.</b> 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?</p>                                   | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| <p><b>e.</b> Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?</p>  | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            |
| <p><b>f.</b> Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?</p>   | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

The Phase 2 (Upper Reach) alignment primarily traverses agricultural lands along roadways (Somis Road, State Route 118) and along the Union Pacific Railroad tracks. Affected vegetation is mostly agricultural crops, and weedy species typically found along roadways and agricultural lands. However, native vegetation occurs at some of the proposed drainage crossings. Vegetation and habitat removal associated with pipeline installation may adversely affect special-status species and result in take of migratory birds. Wetlands and wildlife movement corridors may also be adversely affected by pipeline installation activities at drainage crossings. The project may result in potentially significant impacts to biological resources, which will be fully addressed in the EIR.

**2.5 CULTURAL RESOURCES**

| <p><b>Would the project:</b></p>  | <p><b>Potentially Significant Impact</b></p> | <p><b>Less Than Significant with Mitigation</b></p> | <p><b>Less Than Significant Impact</b></p> | <p><b>No Impact</b></p>             |
|---|--|---|--|-------------------------------------|
| <p><b>a.</b> Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5 of the CEQA Guidelines?</p>    | <input type="checkbox"/>                     | <input type="checkbox"/>                            | <input type="checkbox"/>                   | <input checked="" type="checkbox"/> |
| <p><b>b.</b> Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 of the CEQA Guidelines?</p> | <input type="checkbox"/>                     | <input checked="" type="checkbox"/>                 | <input type="checkbox"/>                   | <input type="checkbox"/>            |

|   |                          |                                     |                          |                                     |
|---|--------------------------|-------------------------------------|--------------------------|-------------------------------------|
| c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d. Disturb any human remains, including those interred outside of formal cemeteries?                    | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |

The 2002 Program EIR/EA identified three historic properties (Ventura County landmarks) in the community of Somis. The proposed Phase 2D pipeline alignment would avoid Somis and these County landmarks. The 2002 Program EIR/EA identified several known archeological sites in the vicinity of the Segment C-D alignment, which is similar to the present Phase 2 (Upper Reach) alignment. However, archeological surveys were not conducted as part of the Program EIR/EA. Installation of the proposed pipeline has the potential to disturb known or unreported archeological sites and result in significant impacts to cultural resources. These impacts will be fully addressed in the EIR.

## 2.6 GEOLOGY AND SOILS

| Would the project:   | Potentially Significant Impact | Less than Significant Impact with Mitigation | Less than Significant Impact        | No Impact                           |
|--|--------------------------------|--|-------------------------------------|-------------------------------------|
| a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:   |                                |  |                                     |                                     |
| i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42. | <input type="checkbox"/>       | <input type="checkbox"/>                     | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| ii) Strong seismic ground shaking?   | <input type="checkbox"/>       | <input type="checkbox"/>                     | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| iii) Seismic-related ground failure, including liquefaction?   | <input type="checkbox"/>       | <input type="checkbox"/>                     | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| iv) Landslides?  | <input type="checkbox"/>       | <input type="checkbox"/>                     | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| b. Result in substantial soil erosion or the loss of topsoil?  | <input type="checkbox"/>       | <input type="checkbox"/>                     | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?   | <input type="checkbox"/>       | <input type="checkbox"/>                     | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?   | <input type="checkbox"/>       | <input type="checkbox"/>                     | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

| Would the project:   | Potentially Significant Impact | Less than Significant Impact with Mitigation | Less than Significant Impact | No Impact                           |
|--|--------------------------------|--|------------------------------|-------------------------------------|
| e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater? | <input type="checkbox"/>       | <input type="checkbox"/>                     | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |

Earth materials present along the proposed Phase 2 (Upper Reach) pipeline alignment consist of alluvium of the Arroyo Las Posas floodplain. However, some portions of the alignment would traverse artificial fill associated with roadway and/or railroad construction. The Phase 2 (Upper Reach) alignment is located within a liquefaction hazard area.

Due to the presence of faults in the immediate project area, the potential exists for fault rupture to damage the proposed pipeline during the design life of the project. However, the pipeline would be designed and installed to be resistant to seismic-related damage, including ground-shaking and liquefaction.

Pipeline installation would involve temporary removal of vegetation (including crops), and could result in soil erosion. However, pipeline installation would be subject to the State's general storm water permit (Water Quality Order 2009-0009-DWQ), which would require implementation of best management practices to minimize soil erosion. In addition, pipeline crossings would be installed under drainages using trench-less methods, which would prevent disturbance of the streambed and associated erosion during subsequent storm events. Overall, significant impacts related to geology and soils are not anticipated. However, additional discussion and analysis will be provided in the EIR.

**2.7 GREENHOUSE GAS EMISSIONS**

| Would the project:   | Potentially Significant Impact | Less Than Significant with Mitigation | Less Than Significant Impact        | No Impact                           |
|--|--------------------------------|---------------------------------------|-------------------------------------|-------------------------------------|
| a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?      | <input type="checkbox"/>       | <input type="checkbox"/>              | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? | <input type="checkbox"/>       | <input type="checkbox"/>              | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

Pipeline installation would result in temporary greenhouse gas emissions, primarily in the form of CO<sub>2</sub> exhaust emissions from the use of off-road construction equipment and on-road vehicles. However, greenhouse gas emissions would be less than the 7,000 MTCO<sub>2</sub>E per year threshold suggested by the California Air Resources Board for projects. Therefore, greenhouse gas emissions are anticipated to be less than significant. However, additional discussion and analysis will be provided in the EIR as required by Section 15064.4 of the State CEQA Guidelines.

**2.8 HAZARDS AND HAZARDOUS MATERIALS/RISK OF UPSET**

| Would the project:   | Potentially Significant Impact | Less than Significant Impact with Mitigation | Less than Significant Impact        | No Impact                           |
|--|--------------------------------|--|-------------------------------------|-------------------------------------|
| a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?  | <input type="checkbox"/>       | <input type="checkbox"/>                     | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?  | <input type="checkbox"/>       | <input checked="" type="checkbox"/>          | <input type="checkbox"/>            | <input type="checkbox"/>            |
| c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?  | <input type="checkbox"/>       | <input type="checkbox"/>                     | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?                                   | <input type="checkbox"/>       | <input type="checkbox"/>                     | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area? | <input type="checkbox"/>       | <input type="checkbox"/>                     | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?  | <input type="checkbox"/>       | <input type="checkbox"/>                     | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?  | <input type="checkbox"/>       | <input type="checkbox"/>                     | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?   | <input type="checkbox"/>       | <input type="checkbox"/>                     | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

The proposed project would not use, transport or dispose of hazardous materials, and no hazardous materials would be involved with construction and operation of the project. Pipeline installation activities would not occur within a known hazardous materials site; however, contaminated soil could be encountered during excavation/trenching and may result in a hazard to the public or the environment. Although wastewater to be transported by the Phase 2 (Upper Reach) pipeline is not considered hazardous, storm-related pipeline damage at drainage crossings may result in wastewater discharge to surface waters and exceedance of water quality objectives. These impacts are considered potentially significant, and will be fully addressed in the EIR.

**2.9 HYDROLOGY AND WATER QUALITY**

| Would the project:   | Potentially Significant Impact | Less than Significant Impact with Mitigation | Less than Significant Impact        | No Impact                           |
|--|--------------------------------|--|-------------------------------------|-------------------------------------|
| <b>a.</b> Violate any water quality standards or waste discharge requirements?   | <input type="checkbox"/>       | <input type="checkbox"/>                     | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| <b>b.</b> Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)? | <input type="checkbox"/>       | <input type="checkbox"/>                     | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| <b>c.</b> Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?  | <input type="checkbox"/>       | <input type="checkbox"/>                     | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| <b>d.</b> Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?   | <input type="checkbox"/>       | <input type="checkbox"/>                     | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| <b>e.</b> Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems?  | <input type="checkbox"/>       | <input type="checkbox"/>                     | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| <b>f.</b> Otherwise substantially degrade water quality?   | <input type="checkbox"/>       | <input type="checkbox"/>                     | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| <b>g.</b> Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?  | <input type="checkbox"/>       | <input type="checkbox"/>                     | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| <b>h.</b> Place within a 100-year flood hazard area structures which would impede or redirect flood flows?   | <input type="checkbox"/>       | <input type="checkbox"/>                     | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| <b>i.</b> Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?  | <input type="checkbox"/>       | <input type="checkbox"/>                     | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| <b>j.</b> Inundation by seiche, tsunami, or mudflow?   | <input type="checkbox"/>       | <input type="checkbox"/>                     | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

The proposed Phase 2 (Upper Reach) alignment is located adjacent to Calleguas Creek and crosses eight of its tributaries. The reach of Calleguas Creek near the Phase 2 (Upper Reach) alignment is known as Arroyo Las Posas, and is considered impaired under Section 303(d) of the Clean Water Act, due to levels of ammonia, chlordane, chloride, chlorpyrifos, DDT, diazinon, dieldrin, fecal coliform bacteria, nitrate, nitrite, sedimentation/siltation, total dissolved solids and aquatic toxicity.

Pipeline crossings of all drainages (Groves Place Drain, Fox Barranca, Coyote Canyon, Long Canyon, Grimes Canyon, Mahan Barranca, Hunt Wash) would be conducted by trenchless methods (installed under the drainage) and would avoid direct impacts to water quality. Therefore, construction activities are not anticipated to result in exceedances of water quality objectives.

Groundwater may be encountered in trenches or tunnels excavated to install the pipeline. This water would not be discharged to surface waters, but would be pumped from the trench, solids would be settled out, and the water would be discharged to the RSMP or used for dust control at the construction site. Overall, water resources impacts are anticipated to be less than significant. However, additional discussion and analysis will be provided in the EIR.

**2.10 LAND USE AND PLANNING**

| Would the project:  | Potentially Significant Impact | Less than Significant Impact with Mitigation | Less than Significant Impact | No Impact                           |
|---|--------------------------------|--|------------------------------|-------------------------------------|
| a. Physically divide an established community?  | <input type="checkbox"/>       | <input type="checkbox"/>                     | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |
| b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect? | <input type="checkbox"/>       | <input type="checkbox"/>                     | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |
| c. Conflict with any applicable habitat conservation plan or natural community conservation plan?   | <input type="checkbox"/>       | <input type="checkbox"/>                     | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |

The affected parcels (proposed pipeline alignment) are zoned Agricultural-Exclusive, 40 acre minimum parcel size (AE-40 ac). However, one parcel (APN 110-0-240-10) located immediately west of the Los Angeles Avenue/Sand Canyon Road intersection is zoned RE-1 ac (rural exclusive) and may be affected by pipeline installation. Current land use along the proposed pipeline alignment is primarily agriculture.

All proposed facilities would be buried (except minor appurtenances) and would not involve the construction of any roads, barriers, or facilities that could potentially physically divide an existing community. No impact of this nature would result. The proposed project would not conflict with any policies of the Ventura County General Plan.

**2.11 MINERAL RESOURCES**

| Would the project:  | Potentially Significant Impact | Less than Significant Impact with Mitigation | Less than Significant Impact | No Impact                           |
|---|--------------------------------|--|------------------------------|-------------------------------------|
| a. Result in the loss or availability of a known mineral resource that would be of value to the region and the residents of the state?                                | <input type="checkbox"/>       | <input type="checkbox"/>                     | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |
| b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan? | <input type="checkbox"/>       | <input type="checkbox"/>                     | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |

Aggregate is the only locally important mineral resource, and is defined as construction grade sand and gravel. The proposed Phase 2 (Upper Reach) alignment is located primarily in areas mapped as MRZ-1 (no significant aggregate deposits); however, approximately 4,000 feet of the alignment (just west of Balcom Canyon Road) has been mapped as MRZ-4 (areas where available data is inadequate for assignment to any other MRZ category) (California Division of Mines and Geology, 1993). No aggregate production sites are located in proximity to the Phase 2 (Upper Reach) alignment.

The proposed Phase 2 (Upper Reach) alignment is not located in a mineral resource area, and would not hamper the extraction of such resources in the region. Therefore, no impacts to such resources would occur as result of project implementation. The nearest mineral resource recovery site is Grimes Rock, a sand and gravel quarry located approximately 4.2 miles north of the proposed Phase 2 (Upper Reach) alignment. The proposed project would not adversely affect the availability of these mineral resources.

**2.12 NOISE**

| Would the project:  | Potentially Significant Impact      | Less than Significant Impact with Mitigation | Less than Significant Impact        | No Impact                           |
|---|-------------------------------------|--|-------------------------------------|-------------------------------------|
| a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? | <input checked="" type="checkbox"/> | <input type="checkbox"/>                     | <input type="checkbox"/>            | <input type="checkbox"/>            |
| b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?   | <input type="checkbox"/>            | <input type="checkbox"/>                     | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?  | <input type="checkbox"/>            | <input type="checkbox"/>                     | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?  | <input checked="" type="checkbox"/> | <input type="checkbox"/>                     | <input type="checkbox"/>            | <input type="checkbox"/>            |

| Would the project:  | Potentially Significant Impact | Less than Significant Impact with Mitigation | Less than Significant Impact | No Impact                           |
|---|--------------------------------|--|------------------------------|-------------------------------------|
| e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? | <input type="checkbox"/>       | <input type="checkbox"/>                     | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |
| f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?  | <input type="checkbox"/>       | <input type="checkbox"/>                     | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |

The dominant source of noise in the project area is generally vehicle traffic on major roadways, primarily State Route 118 (Los Angeles Avenue) and State Route 34 (Somis Road). However, agricultural equipment may be a dominant noise source during periods of light traffic. Noise sensitive receptors along the proposed Phase 2 (Upper Reach) alignment include the Somis Elementary School, residences within the community of Somis, and rural residences along the pipeline alignment.

Short-term noise would be generated by heavy equipment and heavy-duty trucks associated with pipeline installation. Trench-less pipeline installation under drainages and Los Angeles Avenue may require evening and/or nighttime work, which would generate noise levels exceeding the Ventura County 50 dBA Leq evening construction noise threshold criteria at all sensitive receptors within 2,600 feet of the pipeline (tunnel) crossing, and exceed the 45 dBA Leq nighttime noise threshold criteria at all sensitive receptors within 4,500 feet. Therefore, construction noise would be considered a potentially significant impact, and will be fully addressed in the EIR.

### 2.13 POPULATION AND HOUSING

| Would the project:  | Potentially Significant Impact | Less than Significant Impact with Mitigation | Less than Significant Impact        | No Impact                           |
|---|--------------------------------|--|-------------------------------------|-------------------------------------|
| a. Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? | <input type="checkbox"/>       | <input type="checkbox"/>                     | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?   | <input type="checkbox"/>       | <input type="checkbox"/>                     | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?   | <input type="checkbox"/>       | <input type="checkbox"/>                     | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

The Phase 2 (Upper Reach) pipeline is an integral part of a regional pipeline system that will provide a means for disposal of brine generated by the treatment of poor quality groundwater. The Phase 2 (Upper Reach) pipeline will facilitate the future connection of the Moorpark Wastewater Treatment Plant, proposed Moorpark Desalter, and potentially other treatment facilities to the existing RSMP. Moreover, it may facilitate construction of Phase 3 of the RSMP, which would extend to the city of Simi Valley. The city of Simi Valley would like to reduce its dependence on imported water, as imported water has become more costly and less reliable. Therefore, it is likely that the RSMP will serve as an incentive to the city of Simi Valley to increase its use of local water sources (groundwater and recycled wastewater) in lieu of imported water. It is anticipated that further development of local water resources will reduce the need for imported water over time, but not increase water demands or result in growth. Therefore, a project-related increase in local water supplies is not expected to result in population growth beyond currently forecast levels. Overall, the potential to induce population growth and its related impacts is considered a less than significant impact.

**2.14 PUBLIC SERVICES**

| Would the project:  | Potentially Significant Impact | Less than Significant Impact with Mitigation | Less than Significant Impact | No Impact                           |
|---|--------------------------------|--|------------------------------|-------------------------------------|
| a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services? |                                |  |                              |                                     |
| Fire protection?  | <input type="checkbox"/>       | <input type="checkbox"/>                     | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |
| Police protection?  | <input type="checkbox"/>       | <input type="checkbox"/>                     | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |
| Schools?  | <input type="checkbox"/>       | <input type="checkbox"/>                     | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |
| Parks?  | <input type="checkbox"/>       | <input type="checkbox"/>                     | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |
| Other public facilities?  | <input type="checkbox"/>       | <input type="checkbox"/>                     | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |

Police protection services, fire protection services, schools, parks and other public facilities are normally required to be augmented as a result of projects that increase an area's population (e.g., new residential, commercial, and industrial development). The proposed project would not increase the local population. The proposed pipeline would be buried and would not require fire protection or police protection services. Therefore, no impacts to police protection services, fire protection services, schools, parks and other public facilities are expected.

**2.15 RECREATION**

| Would the project:   | Potentially Significant Impact | Less than Significant Impact with Mitigation | Less than Significant Impact | No Impact                           |
|--|--------------------------------|--|------------------------------|-------------------------------------|
| a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? | <input type="checkbox"/>       | <input type="checkbox"/>                     | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |
| b. Does the project include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?                         | <input type="checkbox"/>       | <input type="checkbox"/>                     | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |

The project would not result in population growth, and would not increase the use of existing neighborhood or regional parks, or any other recreational facilities. As such, the project would not result in the accelerated physical deterioration of any recreational facilities. The project would not involve the construction or expansion of any recreational facilities. Therefore, the project would not have any impacts on the physical environment associated with the construction or use of recreational facilities.

**2.16 TRANSPORTATION/TRAFFIC**

| Would the project:  | Potentially Significant Impact | Less than Significant Impact with Mitigation | Less than Significant Impact        | No Impact                           |
|---|--------------------------------|--|-------------------------------------|-------------------------------------|
| a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit? | <input type="checkbox"/>       | <input type="checkbox"/>                     | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?  | <input type="checkbox"/>       | <input type="checkbox"/>                     | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?   | <input type="checkbox"/>       | <input type="checkbox"/>                     | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

| Would the project:   | Potentially Significant Impact | Less than Significant Impact with Mitigation | Less than Significant Impact        | No Impact                           |
|--|--------------------------------|--|-------------------------------------|-------------------------------------|
| d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?                                 | <input type="checkbox"/>       | <input type="checkbox"/>                     | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| e. Result in inadequate emergency access?  | <input type="checkbox"/>       | <input type="checkbox"/>                     | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities? | <input type="checkbox"/>       | <input type="checkbox"/>                     | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

The Phase 2 (Upper Reach) pipeline alignment would be accessed from SR 34 (Lewis Road/Somis Road) and SR 118 (Los Angeles Avenue). Based on 2011 traffic volumes provided by Caltrans and the Ventura County Level of Service (LOS) thresholds for conventional state highways, SR 34 operates at LOS D and SR 118 operates at LOS E. The minimum acceptable LOS for these two roadways is LOS E. However, the SR 118/SR 34 intersection operates at LOS F at a.m. and p.m. peak hour.

The proposed Phase 2 (Upper Reach) pipeline would not generate long-term vehicle trips, or otherwise adversely affect long-term traffic operations. The project would only generate a small number of construction-related vehicle trips, and would not contribute to a lowered level of service on public roadways. Project construction traffic would utilize roadways operating at acceptable LOS, and would not cause any roadways to function below an acceptable LOS.

Project-related construction traffic would enter SR 34 and SR 118 from minor roadways and agricultural roads, which may cause safety concerns associated with potential collisions with vehicles entering the highway. However, the CMWD would develop a traffic control plan to establish safe traffic patterns and minimize any contribution to traffic congestion. Implementation of the traffic control plan would prevent significant traffic hazards.

## 2.17 UTILITIES AND SERVICE SYSTEMS

| Would the project:   | Potentially Significant Impact | Less than Significant Impact with Mitigation | Less than Significant Impact | No Impact                           |
|--|--------------------------------|--|------------------------------|-------------------------------------|
| a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?  | <input type="checkbox"/>       | <input type="checkbox"/>                     | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |
| b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? | <input type="checkbox"/>       | <input type="checkbox"/>                     | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |

| Would the project:  | Potentially Significant Impact | Less than Significant Impact with Mitigation | Less than Significant Impact        | No Impact                           |
|---|--------------------------------|--|-------------------------------------|-------------------------------------|
| c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?                                     | <input type="checkbox"/>       | <input type="checkbox"/>                     | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?  | <input type="checkbox"/>       | <input type="checkbox"/>                     | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? | <input type="checkbox"/>       | <input type="checkbox"/>                     | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| f. Be served by a landfill with sufficient permitted capacity to accommodate the projects solid waste disposal needs?   | <input type="checkbox"/>       | <input type="checkbox"/>                     | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| g. Comply with federal, state, and local statutes and regulations related to solid waste?   | <input type="checkbox"/>       | <input type="checkbox"/>                     | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

The project may generate excess earth material that would be offered for use at local construction sites, and would not be disposed at a landfill. However, the project would generate small amounts of solid waste during the construction period. Any project that generates solid waste would have an impact on the demand for solid waste disposal capacity in Ventura County. The Countywide Siting Element approved by the California Integrated Waste Management Board on June 20, 2001 demonstrates that the approval of extension of the existing Solid Waste Facility Permit for the Simi Valley Landfill and Recycling Center, combined with the existing permitted capacity of the Toland Road Landfill would provide Ventura County with sufficient disposal capacity beyond the 15 year planning period mandated by State law. Therefore, no individual project would have a significant impact on the demand for solid waste capacity.

## **APPENDIX B**

### **RESPONSES TO NOTICE OF PREPARATION**

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**NATIVE AMERICAN HERITAGE COMMISSION**

1550 Harbor Boulevard, Suite 100  
West Sacramento, CA 95691  
(916) 373-3715  
Fax (916) 373-5471  
Web Site [www.nahc.ca.gov](http://www.nahc.ca.gov)  
Ds\_nahc@pacbell.net  
e-mail: ds\_nahc@pacbell.net

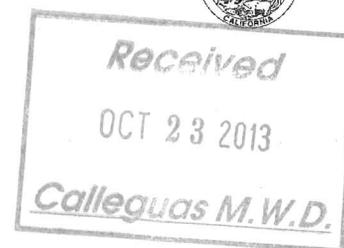


October 21, 2013

Mr. Eric Bergh

**Callegas Municipal Water district**

2100 Olsen Road  
Thousand Oaks, CA 91360-6800



RE: SCH#2013101051 CEQA Notice of Preparation (NOP); draft Environmental Impact Report (DEIR) for the **"Regional Salinity Management Pipeline Phase 2: Upper Ranch; "** located Ventura County, California

Dear Mr. Burgh:

The Native American Heritage Commission (NAHC) has reviewed the above-referenced environmental document

The California Environmental Quality Act (CEQA) states that any project which includes archeological resources, is a significant effect requiring the preparation of an EIR (CEQA guidelines 15064.5(b)). To adequately comply with this provision and mitigate project-related impacts on archaeological resources, the Commission recommends the following actions be required:

Contact the appropriate Information Center for a record search to determine :If a part or all of the area of project effect (APE) has been previously surveyed for cultural places(s), The NAHC recommends that known traditional cultural resources recorded on or adjacent to the APE be listed in the draft Environmental Impact Report (DEIR).

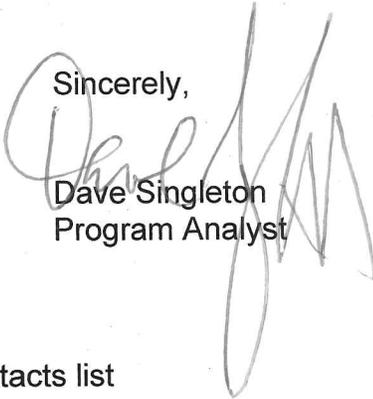
If an additional archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey. We suggest that this be coordinated with the NAHC, if possible. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure pursuant to California Government Code Section 6254.10.

A list of appropriate Native American Contacts for consultation concerning the project site has been provided and is attached to this letter to determine if the

proposed active might impinge on any cultural resources. Lack of surface evidence of archeological resources does not preclude their subsurface existence.

Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, pursuant to California Health & Safety Code Section 7050.5 and California Environmental Quality Act (CEQA) §15064.5(f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities. Also, California Public Resources Code Section 21083.2 require documentation and analysis of archaeological items that meet the standard in Section 15064.5 (a)(b)(f). Lead agencies should include in their mitigation plan provisions for the analysis and disposition of recovered artifacts, in consultation with culturally affiliated Native Americans. Lead agencies should include provisions for discovery of Native American human remains in their mitigation plan. Health and Safety Code §7050.5, CEQA §15064.5(e), and Public Resources Code §5097.98 mandates the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery.

Sincerely,



Dave Singleton  
Program Analyst

CC: State Clearinghouse

Attachment: Native American Contacts list

**Native American Contacts  
Ventura County  
October 21, 2013**

Beverly Salazar Folkes  
1931 Shadybrook Drive  
Thousand Oaks, CA 91362  
folkes9@msn.com  
805 492-7255  
(805) 558-1154 - cell  
folkes9@msn.com

Chumash  
Tataviam  
Ferrnandefio

Patrick Tumamait  
992 El Camino Corto  
Ojai, CA 93023  
(805) 640-0481  
(805) 216-1253 Cell

Chumash

Santa Ynez Band of Mission Indians  
Vincent Armenta, Chairperson  
P.O. Box 517  
Santa Ynez, CA 93460  
varmenta@santaynezchumash.  
(805) 688-7997  
(805) 686-9578 Fax

Chumash

San Luis Obispo County Chumash Council  
Chief Mark Steven Vigil  
1030 Ritchie Road  
Grover Beach CA 93433  
(805) 481-2461  
(805) 474-4729 - Fax

Chumash

Fernandeno Tataviam Band of Mission Indians  
Larry Ortega, Chairperson  
1019 - 2nd Street, Suite #1  
San Fernando CA 91340  
(818) 837-0794 Office  
  
(818) 837-0796 Fax

Fernandeno  
Tataviam

Owl Clan  
Qun-tan Shup  
48825 Sapaque Road  
Bradley, CA 93426  
mupaka@gmail.com  
(805) 472-9536 phone/fax  
(805) 835-2382 - CELL

Chumash

Barbareno/Ventureno Band of Mission Indians  
Julie Lynn Tumamait-Stennslie, Chair  
365 North Poli Ave  
Ojai, CA 93023  
jtumamait@sbcglobal.net  
(805) 646-6214

Chumash

Stephen William Miller  
189 Cartagena  
Camarillo, CA 93010  
(805) 484-2439

Chumash

**This list is current only as of the date of this document.**

**Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.**

his list s only applicable for contacting local Native Americans with regard to cultural resources for the proposed SSCH#2013101051 CEQA Notice of Preparation (NOP); draft Environmental Impact Report (DEIR) for the Regional Salinity Management Project; located in Ventura County, California.

**Native American Contacts  
Ventura County  
October 21, 2013**

Santa Ynez Tribal Elders Council  
Adelina Alva-Padilla, Chair Woman  
P.O. Box 365 Chumash  
Santa Ynez , CA 93460  
elders@santaynezchumash.org  
(805) 688-8446  
(805) 693-1768 FAX

Santa Ynez Band of Mission Indians  
Tribal Admin/Counsel Sam Cohen  
P.O. Box 517 Chumash  
Santa Ynez , CA 93460  
info@santaynezchumash.org  
(805) 688-7997  
(805) 686-9578 Fax

Randy Guzman - Folkes  
4676 Walnut Avenue Chumash  
Simi Valley , CA 93063 Fernandeno  
**ndnRandy@yahoo.com** Tataviam  
(805) 905-1675 - cell Shoshone Paiute  
(805) 520-5915-FAX Yaqui

Carol A. Pulido  
165 Mountainview Street Chumash  
Oak View , CA 93022  
805-649-2743 (Home)

Coastal Band of the Chumash Nation  
Michael Cordero, Chairperson  
P.O. Box 4464 Chumash  
Santa Barbara CA 93140  
CbcnTRIBALCHAIR@gmail.com

Melissa M. Parra-Hernandez  
119 North Balsam Street Chumash  
Oxnard , CA 93030  
envyy36@yahoo.com  
805-983-7964  
(805) 248-8463 cell

Charles S. Parra  
P.O. Box 6612 Chumash  
Oxnard , CA 93031  
(805) 340-3134 (Cell)  
(805) 488-0481 (Home)

Frank Arredondo  
PO Box 161 Chumash  
Santa Barbara CA 93102  
ksen\_sku\_mu@yahoo.com

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**Native American Contacts  
Ventura County  
October 21, 2013**

Santa Ynez Tribal Elders Council  
Freddie Romero, Cultural Preservation Conslnt  
P.O. Box 365 Chumash  
Santa Ynez , CA 93460  
805-688-7997, Ext 37  
freddyromero1959@yahoo.  
com

Coastal Band of the Chumash Nation  
Crystal Baker  
P.O. Box 723 Chumash  
Atascadero , CA 93423  
805-466-8406

Barbareno/Ventureno Band of Mission Indians  
Kathleen Pappo  
2762 Vista Mesa Drive Chumash  
Rancho Pales Verdes CA 90275  
310-831-5295

Barbareno/Ventureno Band of Mission Indians  
Raudel Joe Banuelos, Jr.  
331 Mira Flores Court Chumash  
Camarillo , CA 93012  
805-987-5314

Coastal Band of the Chumash Nation  
Janet Darlene Garcia  
P.O. Box 4464 Chumash  
Santa Barbara CA 93140  
805-689-9528

**This list is current only as of the date of this document.**

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**DEPARTMENT OF TRANSPORTATION**

DISTRICT 7, REGIONAL PLANNING

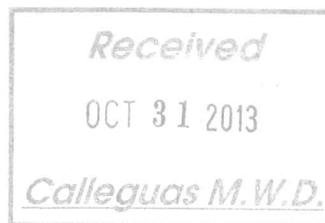
IGR/CEQA BRANCH

100 MAIN STREET, MS # 16

LOS ANGELES, CA 90012-3606

PHONE: (213) 897-9140

FAX: (213) 897-1337

*Flex your power!  
Be energy efficient!*

October 28, 2013

Mr. Eric Bergh  
Calleguas Municipal Water District  
2100 Olsen Road  
Thousand Oaks, CA 91360

RE: Regional Salinity Management, Pipeline Phase 2  
Vicinity: LA-34, PM 16.92 to 27.23  
LA-118, PM 10.92 to 17.574  
IGR/CEQA No. 131042/NOP; SCH#2013101051

Dear Mr. Bergh:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the proposed Regional Salinity Management Pipeline Phase 2 project. The project will be constructed in the cities of Camarillo, Santa Paula and Moorpark California.

The objective of the project is to install and begin operation of approximately 5.5 miles of a 24-inch diameter pipeline to convey brine concentrate from groundwater discharge through an ocean outfall or for re-use.

The Regional Salinity Management Pipeline Phase 2 project will parallel State Route 34 (SR-34) and SR-118, but because the project is in a low traffic volume area, Caltrans does not expect project approval to result in a direct adverse impact to the existing State transportation facilities.

Storm water run-off is a sensitive issue for Los Angeles and Ventura counties. Please be mindful that projects should be designed to discharge clean run-off water. Additionally, discharge of storm water run-off is not permitted onto State highway facilities.

Transportation of heavy construction equipment and/or materials, which requires the use of oversized-transport vehicles on State highways, will require a transportation permit from the Department. It is recommended that large size truck trips be limited to off-peak commute periods. In addition, a truck/traffic construction management plan may be needed for this project.

If you have any questions, you may reach Zeron Jefferson, project coordinator at (213) 897-0219 and please refer to IGR number 131042/ZJ.

Sincerely,

A handwritten signature in cursive script, appearing to read "Dianna Watson".

DIANNA WATSON  
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse



**Ventura County  
Watershed Protection District  
Water and Environmental Resources Division**

**MEMORANDUM**

---

**DATE:** October 29, 2013

**TO:** Eric Bergh, Calleguas Municipal Water District  
[ebergh@calleguas.com](mailto:ebergh@calleguas.com)

**FROM:** Gerhardt Hubner, Ventura County Watershed Protection District *GH*

**CC:** Tully Clifford, Ventura County Watershed Protection District  
Laura Hocking, RMA Planning Division  
Ewelina Mutkowska, Ventura County Watershed Protection District

**SUBJECT:** Calleguas Municipal Water District (CMWD) Regional Salinity  
Management Project (County Project No.  
RMA 13-026)

We have reviewed the Notice of Preparation of a Draft Environmental Impact Report (EIR) for Phase 2 (Upper Reach) of the Regional Salinity Management Project (dated October 16, 2013), and Draft Initial Study (dated October 2013). We find the Draft Initial Study and Initial Study Checklist adequately designates the proper level of potential environmental impacts associated with the project per each environmental issue area, and provides an adequate preliminary impact analysis. We understand additional analysis will be developed and discussed in the draft EIR to address any potential impacts for Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Hazards and Hazardous Materials, Hydrology and Water Quality and Noise. For the Draft Initial Study, Section 2.6 Geology and Soils, we have provided on page 2 of this memo additional comments for consideration.

**PROJECT BACKGROUND**

We understand from the Draft Initial Study the following:

*The proposed project is a component of the Calleguas Municipal Water District's (CMWD) Regional Salinity Management Project (RSMP), which was the subject of a Program EIR/EA, dated August 2, 2002, (SCH No. 2000101104 and EA number 01-LC-007). The RSMP is located within the Calleguas Creek Watershed (Watershed) which faces the presence of increasing salinity levels within the Watershed.*

*Phase 2 (Lower Reach) of the RSMP included approximately 6.6 miles of pipeline, north from the Camrosa Water Reclamation Facility, generally along Lewis Road, to a point just north of Las Posas Road. Phase 2 (Lower Reach) of the RSMP is divided into sub-phases 2A through 2C for construction and design purposes. The revised pipeline alignment and other features of Phases 2A, 2B, and 2C were addressed in a Mitigated Negative Declaration (SCH No.*

2009121083) prepared in 2009. Currently, Phases 2D and 2E (i.e., Upper Reach) are under design and are the subject of this environmental review.

## **PROJECT ELEMENTS**

We understand from the Draft Initial Study the following:

*Phase 2 (Upper Reach) of the RSMP represents pipeline segment C-D (less about one mile between Adolfo Road and Las Posas Road, and about 2,500 feet farther east of Grimes Canyon) as detailed in the 2002 Program EIR/EA. The Phase 2 (Upper Reach) pipeline alignment extends along Somis Road, the Union Pacific Railroad tracks and Los Angeles Avenue (State Route 118), from approximately 400 feet east of the Somis Road/Las Posas Road intersection to approximately 1,000 feet east of the Los Angeles Avenue/Grimes Canyon Road intersection. This alignment is very similar to the Alternative A alignment addressed in the 2002 Program EIR/EA, except the currently proposed pipeline alignment would cross agricultural land instead of following Somis Road to Los Angeles Avenue. The proposed alignment is about 0.2 miles shorter than the Alternative A alignment addressed in the 2002 Program EIR/EA.*

*Characteristics of the currently proposed Phase 2 (Upper Reach) pipeline include:*

- *Approximately 28,800 feet long (5.5 miles);*
- *24 inches in diameter;*
- *The pipeline alignment is located primarily within agricultural fields on private property, outside the public right-of-way of Somis Road and Los Angeles Avenue;*
- *The pipeline would cross five public roadways (Somis Road, Los Angeles Avenue, Sand Canyon Road, Balcom Canyon Road and Grimes Canyon Road); and*
- *The pipeline would cross eight intermittent drainages (Groves Place Drain, Fox Barranca, Coyote Canyon, Sand Canyon, Mahan Barranca, Long Canyon, Hunt Wash, Grimes Canyon).*

*The Phase 2 (Upper Reach) alignment has been divided into two sub-phases (2D and 2E) for the purposes of engineering design. Phase 2D begins just north of Somis Road, approximately 400 feet east of the Las Posas Road/Somis Road Intersection, at the end of Phase 2C. Phase 2D extends along the north side of Somis Road and the Union Pacific Railroad tracks, approximately 12,840 feet, and ends about 450 feet southeast of the Route 118. Phase 2E would cross to the north side of Route 118 and traverse agricultural lands eastward to Hitch Boulevard.*

*Phase 2E pipeline alignment represents a 300-foot-wide environmental assessment corridor to allow for minor changes in the alignment to avoid utilities, levees, roadways, and other structures. However, the actual width of disturbance will generally be less than 75 feet.*

### **ADDITIONAL COMMENTS**

The proposed project will cause more than 1 acre of soil disturbance and as discussed in the Draft Initial Study's Section 2.6 "Geology and Soils", it will be subject to the State General Construction Stormwater Permit. In addition, if the proposed project is subject to any municipal permits or authorization, it will be required to ensure compliance with the Los Angeles Regional Water Quality Control Board NPDES Municipal Stormwater Permit Order No. R4-2010-0108. Specifically, this project may be subject to the construction requirements for surface water quality and stormwater runoff in accordance with Part 4.F., "*Development Construction Program*" of the Permit. The Draft Initial Study's Section 2.6 Geology and Soils should consider implementation of an effective combination of erosion and sediment control measures in accordance with Permit for a disturbed site. If any soil disturbance activities are conducted within 200 feet from the Environmentally Sensitive Areas or on a slope 20% or greater, additional control measure may apply.



**PUBLIC WORKS AGENCY  
TRANSPORTATION DEPARTMENT  
Traffic, Advance Planning & Permits Division**

**MEMORANDUM**

**DATE:** October 30, 2013

**TO:** RMA – Planning Division  
Attention: Laura Hocking

**FROM:** Transportation Department *Bow*

**SUBJECT:** **REVIEW OF DOCUMENT 13-026** Notice of Preparation of Draft Environmental Impact Report / Initial Study (NOP/DEIR/IS)  
Project: **Phase 2 (Upper Reach) of the Regional Salinity Management Project**  
Lead Agency: **Calleguas Municipal Water District**  
Installation of 28,000 lineal feet of 24-inch pipe for subphases 2D and 2E of the Phase 2 (Upper Reach) project in the Somis Area (SOM).

Pursuant to your request, the Public Works Agency – Transportation Department completed the review of the proposed Notice of Preparation of a Draft Environmental Impact Report / Initial Study (NOP/DEIR/IS) for the Phase 2 (Upper Reach) of the Regional Salinity Management Project.

The proposed project is a component of the Calleguas Municipal Water District (CMWD) Regional Salinity Management Project (RSMP), also known as the Calleguas Brine Line, from Port Hueneme to Simi Valley. The southerly end of the brine line has been constructed. The central section is in the design phase or under environmental review. The northerly end is still in the planning phase. Phase 2 (subphases 2D, 2E, and 2F) which is the subject of this environmental review is in the central section and located in the Somis Area.

Construction of the 28,000-foot 24-inch polyvinyl chloride (PVC) and high density polyethylene (PE) pipeline is anticipated to take a construction crew 8 to 10 hours per day with working hours from 7 a.m. to 7 p.m. The work is expected to proceed at an installation rate of 80 to 200 lineal feet per day and generate up to 100 to 200 cubic yards of spoil per day due to the trenching operations. According to the Initial Study, the work is expected to generate up to 35 truck trips per day for the crew, delivery of pipe, importing sand, and removal of the spoils. Nighttime work may be required. Trenchless technologies (horizontal directional drilling, boring and jacking, micro tunneling, or similar methods) will be used at major roadways and creek crossings. The pipeline will be installed in agricultural fields parallel to Somis Road (State Route 34) and Los Angeles Avenue (State Route 118). The pipeline will cross five (5) public roadways (Somis Road, Los Angeles Avenue, Sand Canyon Road, Balcom Canyon Road, and Grimes Canyon Road). The pipe will cross eight (8) creeks or drainages (Groves Place Drain, Fox Barranca, Coyote Canyon, Sand Canyon, Mahan Barranca, Long Canyon, Hunt Wash, Grimes Canyon).

We offer the following comments:

1. An Encroachment Permit (EP) is required for any work or traffic impacts in County road right-of-way. When applying for the EP, the plans for the improvements should show the proximity to the right-of-way and/or road edge of any trenching operations, construction pits, construction equipment, or materials storage. An Oversized Vehicle Permit is required for oversized and heavy loads, if any.
2. Since this project will impact State Route 34 (Somis Road) and State Route 118 (Los Angeles Avenue), Caltrans should also review this project.
3. Since this project may impact the Southern Pacific Railroad, the railroad should also review this project.
4. The DEIR should address the adverse traffic impacts this project will have on the Regional Road Network and local public roads during construction. Of particular interest to the Transportation Department (TD) are the traffic impacts on the intersections of Los Angeles Avenue (State Route 118) at Balcom Canyon Road and Los Angeles Avenue (State Route 118) at Grimes Canyon Road (South).
5. The Mitigation Measures for the construction phase of this project should include a Traffic Management Plan (TMP) and Traffic Control Plan (TCP).
  - a. The TMP and TCP should be reviewed and approved by the Cities of Camarillo and Moorpark, the TD, and Caltrans.
  - b. A TCP is required for any detour, lane closure, or road closure on a County road.
  - c. The TCP should be included in the construction documents.
6. The Mitigation Measures for this project should also include a provision for repairing or replacing asphalt concrete roadway and appurtenant structures that may be damaged during construction.
  - a. The DEIR should include provisions that the District will protect all pavements, curb and gutter, sidewalks, and drainage structures from damage caused by trucks and construction related trips.
  - b. According to County policy, trenching shall not be permitted on any road that has been rehabilitated within the last five years, unless a full width overlay is provided after trenching is completed. Balcom Canyon Road was last paved in 1992. Grimes Canyon Road (South) was last paved in 2008. As of October 2013, these two roadways are not on any five-year paving plan.
  - c. Trucks delivering material or spoils to/from the project shall be covered to secure all material so that any nuisance or danger to the public from flying debris can be avoided.
7. The cumulative impacts of this project, when considered with the cumulative impact of all other approved (or anticipated) projects in the County, will be potentially significant. To address the cumulative adverse impacts of traffic on the County Regional Road Network, the appropriate Traffic Impact Mitigation Fee

(TIMF) should be paid to the County when the project occurs. Based on the information provided in the DEIR/IS, the fee due to the County would be:

$$35 \text{ ADT}^{**} \times \$112.38/\text{ADT}^{***} = \$3,933.30$$

\*\* Estimated trip generation provided on Page 3 of the DEIR/IS

\*\*\* TIMF for Central Traffic District #12

8. According to the County of Ventura Initial Study Assessment Guidelines (ISAG), the Level of Service (LOS) on State Route 34 (Somis Road) and State Route 118 (Los Angeles Avenue) is LOS "E."
  - a. The traffic generated by the project shall avoid the peak hours Monday through Friday. The morning peak period is from 7 a.m. to 9 a.m. and the afternoon/evening peak period is from 4 p.m. to 6 p.m.
  - b. The project shall ensure that access to all local residents is maintained at all times – before, during, and after construction.
9. Please provide the Transportation Department with a copy of the subsequent environmental document when it becomes available for our review and comment.

Our review is limited to the impacts this project may have on the County's Regional Road Network.

T:\Transport1\Planning\Land Development\Non\_County\13-026 (CMWD).doc



**County of Ventura**  
**Public Works Agency**  
**Integrated Waste Management Division**  
**MEMORANDUM**

---

**Date:** November 5, 2013

**To:** Eric Bergh  
Calleguas Municipal Water District

**From:** Derrick Wilson, Staff Services Manager  
Integrated Waste Management Division

**Subject:** Notice of Preparation of a Draft Environmental Impact Report & Initial Study for Phase 2 of the Regional Salinity Management Project  
RMA Reference No: 13-026

**Lead Agcy:** Calleguas Municipal Water District  
**Contact:** Eric Bergh, 805/579-7128

Pursuant to your request, the Integrated Waste Management Division (IWMD) has reviewed the project materials provided with your October 16, 2013, memo and appreciates this opportunity to provide our comments. As noted in the project's Draft Initial Study, Ventura County has at least 15 years of disposal capacity available for waste generated by in-County projects. Therefore, the proposed project will have less than significant project-specific impacts, and will not make a cumulatively considerable contribution to significant cumulative impacts related to Ventura County's solid waste disposal capacity.

The IWMD requests the Lead Agency to comply, to the extent feasible, with the general requirements of Ventura County Ordinances #4445 (solid waste handling, disposal, waste reduction, and waste diversion) and #4421 (requirements for the diversion of construction and demolition debris from landfills by recycling, reuse, and salvage) to assist the County in its efforts to meet the requirements of Assembly Bill 939 (AB 939). AB 939 mandates all cities and counties in California to divert a minimum of 50% of their jurisdiction's solid waste from landfill disposal. Ordinances 4445 and 4421 may be reviewed in their entirety at [www.wasteless.org/ord4445](http://www.wasteless.org/ord4445) and [www.wasteless.org/ord4421](http://www.wasteless.org/ord4421).

Pursuant to IWMD review and responsibilities, the following contract specifications shall apply to this project:

### **Recyclable Construction Materials**

Contract specifications for this project shall include a requirement that recyclable construction materials (e.g., concrete, asphalt, metal, rebar, wood) generated by the project, but not reused on site, be recycled at a permitted recycling facility. For a comprehensive list of permitted recyclers, haulers, and solid waste & recycling facilities in Ventura County, see:

[www.wasteless.org/construction&demolitionrecyclingresources](http://www.wasteless.org/construction&demolitionrecyclingresources).

### **Soil - Recycling & Reuse**

Contract specifications for this project shall include a requirement that soil that is not reused on-site during the construction phase of the project be transported to a permitted facility for recycling or reuse. Illegal disposal and landfilling of soil is prohibited. For a comprehensive list of permitted recyclers, haulers, and solid waste & recycling facilities in Ventura County, see: [www.wasteless.org/construction&demolitionrecyclingresources](http://www.wasteless.org/construction&demolitionrecyclingresources).

### **Green Materials - Recycling & Reuse**

The Contract Specifications for this project shall include a requirement that wood waste and vegetation removed during the construction phase of this project be diverted from the landfill. This can be accomplished by on-site chipping and land-application at various project sites, or by transporting the materials to a permitted greenwaste facility in Ventura County. A complete list of permitted greenwaste facilities is located at:

[www.wasteless.org/greenwasterecyclingfacilities](http://www.wasteless.org/greenwasterecyclingfacilities).

### **Report Quantifying Materials Diverted from Landfill Disposal by On-Site Reuse or Off-site Recycling**

The contract specifications for this project shall include a requirement that all contractors working on the project submit a *Summary Table* to the IWMD at the conclusion of their work. The *Summary Table* must include the contractor's name, address, and phone number, the project's name, the types of recyclable materials generated during the project (e.g., concrete, asphalt, rebar, wood, soil, greenwaste) and the *approximate* weight of recyclable materials:

- Reused on-site, and/or
- Transported to permitted facilities for recycling and/or reuse.
- Please include the name, address, and phone number of the facilities where recyclable materials were transported for recycling or reuse in the *Summary Table*.

Receipts and/or documentation are required for each entry in the *Summary Table* to verify recycling and/or reuse occurred, and that recyclable greenwaste, wood, soil, and sediment generated by this project was not landfilled.

Should you have any questions regarding this memo, please contact Pandee Leachman at 805/658-4315.

## Matt Ingamells

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**From:** Eric Bergh <EBergh@calleguas.com>  
**Sent:** Tuesday, November 05, 2013 10:09 AM  
**To:** Matt Ingamells  
**Subject:** FW: Draft EIR for Phase 2 of the Regional SMP project.

Matt – VCWWD's comment re NOP is provided below.

---

*Eric Bergh*  
*Manager of Resources*  
Calleguas MWD  
805-579-7128  
[www.calleguas.com](http://www.calleguas.com)

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**From:** Susan Pan [<mailto:Susan.Pan@ventura.org>]  
**Sent:** Tuesday, November 05, 2013 10:06 AM  
**To:** Eric Bergh  
**Cc:** Eric Keller; Reddy Pakala  
**Subject:** Re: Draft EIR for Phase 2 of the Regional SMP project.

Good Morning Eric,

The Ventura County Water and Sanitation Department has reviewed the Project Description and Initial Study Checklist for Phase 2 of the Regional SMP project. Our comment is listed below:

We recommend that Calleguas MWD extends the Salinity Management Pipeline past the Hitch Blvd in Los Angeles Avenue for the Phase 2E. The current Figure shows the Phase 2E terminating several hundred feet west of Hitch Blvd.

Please let us know if you have any question regarding our comment. Thank you for the opportunity to review the draft document.

Sincerely,

Susan Pan, P.E.  
Manager of Planning, Design, and Construction Division  
Water and Sanitation Department  
Public Works Agency  
County of Ventura  
6767 Spring Road  
Moorpark, CA 93021

Office Phone 805-378-3025  
Cell Phone 805-804-7382



EDMUND G. BROWN JR.  
GOVERNOR

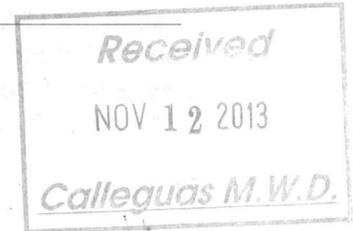


MATTHEW RODRIGUEZ  
SECRETARY FOR  
ENVIRONMENTAL PROTECTION

State Water Resources Control Board

NOV 07 2013

Eric Bergh  
Calleguas Municipal Water District  
2100 Olsen Road  
Thousand Oaks, CA 91360-6800



Dear Mr. Bergh:

CLEAN WATER STATE REVOLVING FUND (CWSRF) PROGRAM INFORMATION FOR THE CALLEGUAS MUNICIPAL WATER DISTRICT (DISTRICT); REGIONAL SALINITY MANAGEMENT PIPELINE PHASE 2: UPPER RANCH (PROJECT); VENTURA COUNTY; STATE CLEARINGHOUSE NO. 2013101051

We have received a copy of the District's Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) from the State Clearinghouse for the Project. Since the Project may be eligible for CWSRF financing, the State Water Resources Control Board (State Water Board) is providing information on the environmental review requirements of the CWSRF Program, should the District decide to pursue CWSRF financing in the future.

The CWSRF Program provides low-cost financial assistance for a wide variety of water quality improvement and enhancement projects that protect water quality and public health. It has grant funds under certain conditions with limited availability. The application period is continuous. For additional information, please refer to the State Water Board's CWSRF Program website at:

[http://www.waterboards.ca.gov/water\\_issues/programs/grants\\_loans/srf/index.shtml](http://www.waterboards.ca.gov/water_issues/programs/grants_loans/srf/index.shtml).

Due to staffing constraints, we are unable to review the DEIR and provide "specific" comments at this time, if there are no clear indications that an agency will seek funding from the CWSRF Program. If the District decides to pursue CWSRF financing, please note that in addition to California Environmental Quality Act (CEQA) requirements, there are federal environmental laws and regulations applicable to the CWSRF Program. Any environmental issues raised must be resolved before the State Water Board can approve CWSRF financing for your Project. Three enclosures are included that further explain the CWSRF Program environmental review process and the additional federal requirements. For the complete environmental application package please visit:

[http://www.waterboards.ca.gov/water\\_issues/programs/grants\\_loans/srf/srf\\_forms.shtml](http://www.waterboards.ca.gov/water_issues/programs/grants_loans/srf/srf_forms.shtml).

The District must meet those listed federal requirements if it decides to seek CWSRF financing.

Thank you for your consideration of the CWSRF Program. State Water Board staff is more than happy to discuss the CWSRF Program environmental requirements in more detail if you decide to apply for CWSRF financing. If you have any questions or concerns about the State Water Board CWSRF Program environmental review process or the information provided in this letter, please feel free to contact me at (916) 341-5855, or [AKashkoli@waterboards.ca.gov](mailto:AKashkoli@waterboards.ca.gov), or contact Christopher Bruni at (916) 341-5879, or [Christopher.Bruni@waterboards.ca.gov](mailto:Christopher.Bruni@waterboards.ca.gov).

Sincerely,



Ahmad Kashkoli  
Senior Environmental Scientist  
Division of Financial Assistance

Enclosures (3)

1. SRF & CEQA-Plus
2. Clean Water State Revolving Fund Environmental Review Requirements
3. Basic Criteria for Cultural Resources Reports

cc: State Clearinghouse  
(Re: SCH# 2013101051)  
P.O. Box 3044  
Sacramento, CA 95812-3044

# BASIC CRITERIA FOR CULTURAL RESOURCES REPORTS

## FOR SECTION 106 CONSULTATION WITH THE STATE HISTORIC PRESERVATION OFFICER (SHPO) UNDER THE NATIONAL HISTORIC PRESERVATION ACT (NHPA)

### **CULTURAL RESOURCES REPORTS**

The Section 106 compliance efforts and reports must be prepared by a qualified researcher that meets the Secretary of the Interior's Professional Qualifications Standards ([http://www.cr.nps.gov/local-law/arch\\_stnds\\_9.htm](http://www.cr.nps.gov/local-law/arch_stnds_9.htm)).

### **REPORT TERMINOLOGY**

A cultural resources report used for Section 106 consultation should use terminology consistent with 36 CFR, Section 800.16 of the NHPA. However, this does not mean that the report needs to be "filled" with passages and interpretations of the regulations; the SHPO already knows the law.

- If "findings" are made, they must be one of the four "findings" listed in Section 106. These include:

*"No historic properties affected" (no properties are within the area of potential effects [APE], including the below ground APE).*

*"No effect to historic properties" (properties may be near the APE, but the project will not impact them).*

*"No adverse effect to historic properties" (the project may affect historic properties, but the impacts will not be adverse).*

*"Adverse effect to historic properties". Note: The SHPO must be consulted at this point. If your consultant proceeds on his own, his efforts may be wasted.*

### **CURRENT RECORDS SEARCH INFORMATION**

- A current (less than a year old) records search from the appropriate Information Center is necessary. The records search should include maps that show all recorded sites and surveys in relation to the APE for the project.
- The APE is three-dimensional and includes all areas that may be affected by the project. It includes the surface area and extends below ground to the depth of any project excavations.
- The records search request should be made for an area that extends to a mile beyond the APE to provide information on what types of sites may exist in the vicinity.

## **NATIVE AMERICAN AND INTERESTED PARTY CONSULTATION**

- *Native American and interested party consultation should be initiated at the beginning of any cultural resource investigations. The purpose is to gather information from people with local knowledge that may be used to guide research.*
- *A project description and map should be sent to the Native American Heritage Commission (NAHC) requesting a check of their Sacred Lands Files. The Sacred Lands Files include religious and cultural places that are not recorded at the information centers.*
- *The NAHC will include a list of Native American groups and individuals with their response. A project description and maps should be sent to everyone on the list asking for information on the project area.*
- *Similar letters should be sent to local historical organizations.*
- *Follow-up contact should be made by phone, if possible, and a phone log should be included in the report.*

## **WARNING PHRASES IN ALREADY PREPARED CEQA REPORTS**

- *A finding of “**no known resources**” doesn’t mean anything. The consultant’s job is to find out if there are resources within the APE or to explain why they are not present.*
- *“**The area is sensitive for buried archaeological resources**”, followed by a statement that “**monitoring is recommended as mitigation**”. Monitoring is not an acceptable mitigation. A reasonable effort should be made to find out if buried resources are present in the APE.*
- *“**The area is already disturbed by previous construction**” may be true, but documentation is still needed to show that the new project will not affect cultural resources. As an example, an existing road can be protecting a buried archaeological site, or previous construction may have impacted an archaeological site that was never documented.*
- *No mention of “**Section 106**”; a report that gives adequate information for CEQA may not be sufficient to comply with Section 106.*

## **SHPO CONSULTATION LETTER**

- *A Section 106 consultation letter should be prepared by a qualified researcher, and submitted along with the Section 106 Report to the State Water Board to use for consultation with the State Historic Preservation Officer. For additional information on submissions for Section 106 consultation please refer to:  
[http://www.ohp.parks.ca.gov/pages/1054/files/106checklist\\_shortform\\_2013\\_10\\_10.pdf](http://www.ohp.parks.ca.gov/pages/1054/files/106checklist_shortform_2013_10_10.pdf)  
[http://www.ohp.parks.ca.gov/pages/1054/files/106checklist\\_details\\_2013\\_10\\_10.pdf](http://www.ohp.parks.ca.gov/pages/1054/files/106checklist_details_2013_10_10.pdf)*

## **STATE WATER BOARD CONTACT INFORMATION**

*If you have any questions related to CWSRF Program cultural resources compliance, please contact Mr. Ahmad Kashkoli at (916) 341-5855 or [akashkoli@waterboards.ca.gov](mailto:akashkoli@waterboards.ca.gov).*

# Clean Water State Revolving Fund Environmental Review Requirements



The California State Water Resources Control Board (State Water Board), Division of Financial Assistance, administers the Clean Water State Revolving Fund (CWSRF) Program. The CWSRF Program is partially funded by grants from the United States Environmental Protection Agency. All applicants seeking CWSRF funds must comply with the California Environmental Quality Act (CEQA), and provide sufficient information so that the State Water Board can document compliance with federal environmental laws. The Environmental Package provides the forms and instructions needed to complete the environmental review requirements for CWSRF Program financing. It can be found at:

[http://www.waterboards.ca.gov/water\\_issues/programs/grants\\_loans/srf/srf\\_forms.shtml](http://www.waterboards.ca.gov/water_issues/programs/grants_loans/srf/srf_forms.shtml)

## **LEAD AGENCY**

The applicant is usually the **Lead Agency** and must prepare and circulate an environmental document before approving a project. Only a public agency, such as a local, regional or state government, may be the Lead Agency under CEQA. If a project will be completed by a non-governmental organization, Lead Agency responsibility goes to the first public agency providing discretionary approval for the project.

Responsible Agency, the State Water Board must make findings based on information provided by the Lead Agency before funding a project.

## **ENVIRONMENTAL REVIEW**

The State Water Board's environmental review of the Project's compliance with both CEQA and federal cross-cutting regulations must be completed before a project can be funded by the CWSRF Program.

## **RESPONSIBLE AGENCY:**

### **STATE WATER BOARD**

The State Water Board's mission is to preserve, enhance and restore the quality of California's water resources, and ensure their proper allocation and efficient use for the benefit of present and future generations. To fulfill this responsibility, and to carry out obligations, the State Water Board is a **Responsible Agency** under CEQA. As a

## **DOCUMENT REVIEW**

Applicants are encouraged to consult with State Water Board staff early during development of CEQA documents if considering CWSRF funding. Applicant shall also send their environmental documents to the State Water Board, Environmental Review Unit during the CEQA public review period. This way, any environmental concerns can be addressed early in the process.

## **REQUIRED DOCUMENTS**

The Environmental Review Unit requires the documents listed below to make findings and complete its environmental review. Once the State Water Board receives all the required documents and makes its own findings, the environmental review for the funding will be complete.

- ✓ **Draft and Final Environmental Documents** – Environmental Impact Reports, Negative Declarations, Mitigated Negative Declarations, and Notices of Exemption;
- ✓ **Resolution** from the applicant adopting/certifying the environmental document, making CEQA findings, and approving the project;
- ✓ **All comments** received during the public review period and the Lead Agency's responses to those comments;
- ✓ **Adopted Mitigation Monitoring and Reporting Plan**, if applicable;
- ✓ **Date-stamped copy of the Notice of Determination or Notice of Exemption** filed with the County Clerk(s) and the Governor's Office of Planning and Research; and
- ✓ **CWSRF Evaluation Form for Environmental Review and Federal Coordination** completed by the applicant with supporting documents.

## **CONTACT INFORMATION**

For more information related to the CWSRF Program environmental review process and requirements, please contact your State Water Board Project Manager or Mr. Ahmad Kashkoli at (916) 341-5855 or [Ahmad.Kashkoli@waterboards.ca.gov](mailto:Ahmad.Kashkoli@waterboards.ca.gov).





**VENTURA COUNTY WATERSHED PROTECTION DISTRICT**  
PLANNING AND REGULATORY DIVISION  
800 South Victoria Avenue, Ventura, California 93009  
Tom Wolfington, Permit Manager – (805) 654-2061

**M E M O R A N D U M**

DATE: November 11, 2013

TO: Laura Hocking, RMA/Planning Technician

FROM: Tom Wolfington, P.E., Permit Manager *JW*

SUBJECT: RMA 13-026 –Calleguas Municipal Water District: Phase 2 (Upper Reach) of the Regional Salinity Management Project  
Notice of Preparation (NOP) of a Draft Environmental Impact Report (EIR) and Initial Study (IS)  
Approximately 400 Feet Easterly of the Somis Road/ Las Posas Road Intersection to Approximately 1,000 Feet Easterly of the Los Angeles Avenue/ Grimes Canyon Road Intersection  
Calleguas Creek Watershed, Zone 3

Pursuant to your request, this office has reviewed the subject Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) and Initial Study (IS) prepared by Padre Associates, Inc., dated October 2013.

**PROJECT DESCRIPTION**

The proposed project represents Phase 2 (Upper Reach) of the Calleguas Municipal Water District's Regional Salinity Management Pipeline Project and is located in the Calleguas Creek Watershed. The alignment primarily follows Somis Road, the Union Pacific Railroad tracks, and Los Angeles Avenue (State Route 118). The end-southwesterly terminus of the pipeline segment is located approximately 400 feet easterly of the Somis Road/ Las Posas Road intersection and the end-easterly terminus is approximately 1,000 feet east of the Los Angeles Avenue/ Grimes Canyon Road intersection.

The Phase 2 alignment has been divided into two sub-phases (2D and 2E) for the purposes of engineering design. The pipeline will be constructed of one or a combination of materials including polyvinyl chloride and high density polyethylene. As stated on Pages 3 and 12 of the Draft IS, pipeline installation at watercourse crossings will primarily be conducted using trenchless methods such as horizontal directional drilling (HDD), jacking and boring, micro tunneling, or similar methods. Typical crossings will involve the construction of pits on each side of the crossing and use of a machine to bore a horizontal hole under the structure, road, or watercourse. A steel casing will then be inserted in the hole and pipeline segments will be installed in the casing and connected to the in-place segments of pipeline on either side of the crossing.

November 11, 2013

RMA 13-026 –Calleguas Municipal Water District: Phase 2 (Upper Reach) of the  
Regional Salinity Management Project

Page 2 of 2

The proposed pipeline alignment will be adjacent to Calleguas Creek and will cross eight Ventura County Watershed Protection District (District) jurisdictional redline channels including Groves Place Drain, Fox Barranca, Coyote Canyon, Sand Canyon, Mahan Barranca, Long Canyon, Hunt Wash, and South Grimes Canyon Wash.

**WATERSHED PROTECTION DISTRICT PROJECT COMMENTS:**

The Draft IS states on Pages 3 and 18 that pipeline crossings of all watercourses will be conducted by trenchless technology methods such as horizontal directional drilling (HDD), jacking and boring, micro tunneling, or similar methods. Further, the environmental report makes a finding on Page 17 that the proposed project would result in a Less than Significant Impact relative to altering the existing drainage pattern of the site or area, and contributing runoff water which would exceed the capacity of existing or planned stormwater drainage systems.

The final EIR should acknowledge the District's jurisdictional authority and include a recommendation that any activity, including HDD, jacking and boring, micro-tunneling, and other similar method, that is proposed at any time in, on, over, under, or across Calleguas Creek, Groves Place Drain, Fox Barranca, Coyote Canyon, Sand Canyon, Mahan Barranca, Long Canyon, Hunt Wash, South Grimes Canyon Wash, or any other District jurisdictional redline channel will require permits from the Ventura County Watershed Protection District. During the permitting process the projects should be evaluated for sufficient clearance (typically six feet minimum) below the stream bed or the bottom of any planned future flood control improvements. The recommendation should also include the following District standards:

1. The project will not impair, divert, impede or alter the characteristics of the flow of water running in any jurisdictional red line channel.
2. The District criteria for mitigating any increase in impervious area is that the peak flow after development shall not exceed the peak flow under existing conditions for any frequency of event.

**END OF TEXT**



State of California – Natural Resources Agency  
DEPARTMENT OF FISH AND WILDLIFE  
South Coast Region  
3883 Ruffin Road  
San Diego, CA 92123  
(858) 467-4201  
www.wildlife.ca.gov

EDMUND G. BROWN JR., Governor  
CHARLTON H. BONHAM, Director



November 15, 2013

Mr. Eric Bergh  
Calleguas Municipal Water District  
2100 Olsen Road  
Thousand Oaks, CA 91360  
ebergh@calleguas.com

**Subject: Notice of Preparation of an Environment Impact Report for the Regional Salinity Management Project Phase 2, Upper Ranch, Calleguas Municipal Water District, Ventura County**

Dear Mr. Bergh:

The California Department of Fish and Wildlife (Department) has received the Notice of Preparation of the Draft Environmental Impact Report (DEIR) for the Phase 2 (Upper Reach) of the Regional Salinity Management Project (project). The proposed project is a component of the Calleguas Municipal Water District's Regional Salinity Management Project, which was the subject of a Program EIR/EA, dated August 2, 2002. The project is located within the Calleguas Creek Watershed. Phase 2 of the project represents a pipeline of approximately 5.5 miles divided into two sub-phases. The pipeline alignment is located primarily within agricultural fields on private property, outside the public right-of-way of Somis Road and Los Angeles Avenue.

The Department is California's Trustee Agency for fish and wildlife resources, holding these resources in trust for the People of the State pursuant to various provisions of the California Fish and Game Code (Fish & G. Code, §§ 711.7, subd. (a); 1802.). The Department submits these comments in that capacity under the California Environmental Quality Act (CEQA) (See generally Pub. Resources Code, §§ 21070; 21080.4.). Given its related permitting authority under the California Endangered Species Act (CESA) and Fish and Game Code section 1600 et seq., the Department also submits these comments as a potential Responsible Agency for the project under CEQA (Pub. Resources Code, § 21069).

The California Wildlife Action Plan, a recent Department guidance document, identified the following stressors affecting wildlife and habitats within the project area: 1) growth and development; 2) water management conflicts and degradation of aquatic ecosystems; 3) invasive species; 4) altered fire regimes; and 5) recreational pressures. The Department looks forward to working with the Water District to minimize impacts to fish and wildlife resources with a focus on these stressors. A copy of the current California Wildlife Action Plan can be viewed at: <http://www.dfg.ca.gov/SWAP/2005/index.html>

To enable Department staff to adequately review and comment on the proposed project the Department recommends the following information, where applicable, be included in the DEIR:

1. A complete, recent assessment of flora and fauna within and adjacent to the project area, with particular emphasis upon identifying endangered, threatened, and locally unique species and sensitive habitats including:

- a. A thorough, recent assessment of rare plants and rare natural communities, following the Department's Guidelines for Assessing Impacts to Rare Plants and Rare Natural Communities (See Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities at: <http://www.dfg.ca.gov/habcon/plant/>.)
  - b. A complete, recent assessment of sensitive fish, wildlife, reptile, and amphibian species. Seasonal variations in use within the project area should also be addressed. Recent, focused, species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required.
  - c. Endangered, rare, and threatened species to address should include all those species which meet the related definition under the CEQA Guidelines (See Cal. Code Regs., tit. 14, § 15380).
  - d. The Department's Biogeographic Data Branch in Sacramento should be contacted at (916) 322-2493 ([www.dfg.ca.gov/biogeodata](http://www.dfg.ca.gov/biogeodata)) to obtain current information on any previously reported sensitive species and habitats, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code. Also, any Significant Ecological Areas (SEAs) or Environmentally Sensitive Habitats (ESHs) or any areas that are considered sensitive by the local jurisdiction that are located in or adjacent to the project area should be addressed.
2. A thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts. This discussion should focus on maximizing avoidance, and minimizing impacts.
- a. CEQA Guidelines Section 15125(a) direct that knowledge of the regional setting is critical to an assessment of environmental impacts and that special emphasis should be placed on resources that are rare or unique to the region.
  - b. A cumulative effects analysis should be developed as described under CEQA Guidelines, Section 15130. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant communities and wildlife habitats.
  - c. Project impacts including deposition of debris should also be analyzed relative to their effects on off-site habitats and populations. Specifically, this should include nearby public lands, open space, natural habitats, and riparian ecosystems. Impacts to and maintenance of wildlife corridor or movement areas, including access to undisturbed habitat in adjacent areas are of concern to the Department and should be fully evaluated and provided. The analysis should also include a discussion of the potential for impacts resulting from such effects as increased vehicle traffic, outdoor artificial lighting, noise and vibration and pest management.
  - d. Impacts to migratory wildlife affected by the project should be fully evaluated including proposals to remove/disturb native and ornamental landscaping and other nesting habitat for native birds. Impact evaluation may also include such elements as migratory

- butterfly roost sites and neo-tropical bird and waterfowl stop-over and staging sites. All migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (50 C.F.R. § 10.13). Sections 3503, 3503.5 and 3513 of the California Fish and Game Code prohibit take of birds and their active nests, including raptors and other migratory nongame birds as listed under the MBTA.
- e. Active Breeding and/or Nests. If the nesting season cannot be avoided and construction or vegetation removal occurs between March 1st to September 15th (January 1st to July 31st for raptors), the Permittee will do one of the following to avoid and minimize impacts to nesting birds;
- 1) Implement a default 300 foot minimum avoidance buffer for all passerine bird nests and 500 foot minimum avoidance buffer for all raptor species. The breeding habitat/nest site shall be fenced and/or flagged in all directions, and this area shall not be disturbed until the nest becomes inactive, the young have fledged, the young are no longer being fed by the parents, the young have left the area, and the young will no longer be impacted by the project.
  - 2) Develop a project-specific Nesting Bird Protection Plan. The site-specific nest protection plan shall be submitted to the lead agency for review and the Department. The Plan should include detailed methodologies and definitions to enable a qualified Department-approved avian biologist to monitor and implement nest-specific buffers based upon the life history of the individual species; species sensitivity to noise, vibration, and general disturbance; individual bird behavior; current site condition (screening topography, vegetation, etcetera), ambient levels of activities; and the various project-related activities necessary to construction the project. This Nesting Bird Protection Plan shall be supported by a Nest Log which tracks each nest and the survivorship of nestlings and fledglings. The Nest Log will be submitted to the Lead Agency and the Department at the end of each week.
  - 3) The Project Proponent may propose an alternative plan for avoidance of nesting birds for Department review.
- f. Impacts from project activities that will result in disturbances to habitat that may provide maternity roosts for bats (e.g., tree cavities, under loose bark, buildings), should occur outside of the bat breeding season which generally runs from March 1-August 31. Bats are considered non-game mammals and are afforded protection by state law from take and/or harassment, (Fish and Game Code § 4150, California Code of Regulations, § 251.1). Several bat species are also considered special status species and meet the CEQA definition of rare, threatened or endangered species (CEQA Guidelines 15065).
- g. Impacts to natural habitats from implementing Fuel Modification Zones should be addressed with appropriate mitigation. Areas proposed for project mitigation should be located outside fuel modification zones.
3. A range of alternatives should be analyzed to ensure that alternatives to the proposed project are fully considered and evaluated. A range of alternatives which avoid or otherwise minimize impacts to sensitive biological resources including wetlands or riparian habitats,

alluvial scrub, coastal sage scrub, should be included. Specific alternative locations should also be evaluated in areas with lower resource sensitivity where appropriate.

- a. Mitigation measures for project impacts to sensitive plants, animals, and habitats should emphasize evaluation and selection of alternatives which avoid or otherwise minimize project impacts. Compensation for unavoidable impacts through acquisition and protection of high quality habitat elsewhere should be addressed with off-site mitigation locations clearly identified.
  - b. The Department considers Rare Natural Communities as threatened habitats having both regional and local significance.
  - c. The Department generally does not support the use of relocation, salvage, and/or transplantation as mitigation for impacts to rare, threatened, or endangered species. Department studies have shown that these efforts are experimental in nature and largely unsuccessful.
4. Take of any endangered, threatened, or candidate species that results from the project is prohibited, except as authorized by state law (Fish and Game Code, §§ 2080, 2085.). Consequently, if the Project, project construction, or any project-related activity during the life of the project will result in take of a species designated as endangered or threatened, or a candidate for listing under the CESA, the Department recommends that the project proponent seek appropriate take authorization under CESA prior to implementing the project. Appropriate authorization from the Department may include an incidental take permit (ITP) or a consistency determination in certain circumstances, among other options (Fish and Game Code §§ 2080.1, 2081, subs. (b),(c)). Early consultation is encouraged, as significant modification to a project and mitigation measures may be required in order to obtain a CESA Permit. Revisions to the Fish and Game Code, effective January 1998, may require that the Department issue a separate CEQA document for the issuance of an ITP unless the project CEQA document addresses all project impacts to CESA-listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of an ITP. For these reasons, biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA ITP.
5. The Department opposes the elimination of watercourses (including concrete channels, blue-line streams and other watercourses not designated as blue-line streams on USGS maps) and/or the channelization of natural and manmade drainages or conversion to subsurface drains. All wetlands and watercourses, whether intermittent, ephemeral, or perennial, must be retained and provided with substantial setbacks which preserve the riparian and aquatic habitat values and maintain their value to on-site and off-site wildlife populations. The Department recommends a minimum natural habitat buffer of 100 feet from the outside edge of the riparian zone on each side of drainage.
- a. The Department also has regulatory authority with regard to activities occurring in streams or lakes that could adversely affect any fish or wildlife resource. For any activity that will divert or obstruct the natural flow, or change the bed, channel, or bank (which may include associated riparian resources) or a river or stream or use material from a streambed, the project applicant (or "entity") must provide written notification to the Department pursuant to Section 1602 of the Fish and Game Code. Based on this

Mr. Eric Bergh  
Calleguas Municipal Water District  
November 15, 2013  
Page 5 of 5

notification and other information, the Department then determines whether a Lake and Streambed Alteration (LSA) Agreement is required. The Department's issuance of an LSA Agreement is a project subject to CEQA. To facilitate issuance of a LSA Agreement, if necessary, the environmental document should fully identify the potential impacts to the lake, stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the LSA Agreement. Early consultation is recommended, since modification of the proposed project may be required to avoid or reduce impacts to fish and wildlife resources. Again, the failure to include this analysis in the project's environmental impact report could preclude the Department from relying on the Lead Agency's analysis to issue a LSA Agreement without the Department first conducting its own analysis, as Lead Agency for subsequent or supplemental analysis for the project.

Thank you for this opportunity to provide comments. The Department encourages project planning meetings and is interested in meeting with the Calleguas Municipal Water District to discuss the project. Please contact Mr. Dan Blankenship Senior Environmental Scientist (Specialist) at (661) 259-3750 or [Daniel.Blankenship@wildlife.ca.gov](mailto:Daniel.Blankenship@wildlife.ca.gov) if you should have any questions and for further coordination on the proposed project.

Sincerely,



Betty Courtney  
Environmental Program Manager I  
South Coast Region

cc: Mr. Ali Aghili, CDFW, Los Alamitos  
Mr. Jeff Humble, CDFW, Ventura  
State Clearinghouse, Sacramento

**VENTURA COUNTY**  
**AIR POLLUTION CONTROL DISTRICT**  
Memorandum

TO: Laura Hocking/Lori Gregory, Planning                      DATE: November 18, 2013

FROM: Alicia Stratton

SUBJECT: Request for Review of Notice of Preparation for a Draft Environmental Impact Report for Phase 2 of the Regional Salinity Management Project, Calleguas Municipal Water District (Reference No. 13-026)

Air Pollution Control District staff has reviewed the subject Notice of Preparation (NOP) for a Draft Environmental Impact Report (DEIR), which is a proposal for the Upper Reach of a pipe alignment for the Calleguas Municipal Water District. The project proposes 5.5 miles of 24-inch diameter pipeline located primarily within agricultural fields on private property and crossing 5 public roadways and 8 intermittent drainages. The project would be divided into two subphases, one beginning north of Somis Road east of the Las Posas/Somis Road intersection and the other phase would cross to the north side of Route 118 and cross agricultural lands to Hitch Blvd.

Section 2.3 of the NOP addresses air quality issues. We concur with the findings of the initial study, which indicate that air quality impacts would be significant but potentially mitigable with appropriate air quality mitigation. District staff recommends the DEIR evaluate all potential air quality impacts that may result from the project. Specifically, the air quality assessment should consider reactive organic compound, nitrogen oxide emissions and particulates from all project-related motor vehicles and construction equipment. We also recommend that the potential for Valley Fever be addressed in the DEIR because of the recent fires and potential Valley Fever disturbance on the project site.

If you have any questions, please call me at (805) 645-1426.

# KIRTON | McCONKIE

Tyler L. Buswell  
tbuswell@kmclaw.com  
801.321.4820

November 21, 2013

**Via Email and FedEx**

Eric Bergh  
Calleguas Municipal Water District  
2100 Olsen Road  
Thousand Oaks, California 91360  
ebergh@calleguas.com

**Re: Comments to Notice of Preparation of a Draft Environmental Impact Report  
for Phase 2 (Upper Reach) of the Regional Salinity Management Project**

Dear Mr. Bergh:

This law firm represents Farmland Reserve, Inc. (“FRI”), the owner of Assessor’s Parcel Numbers 503-0-060-115, 503-0-060-155, and 503-0-060-180 located in Ventura County, California, and more commonly known as the Moorpark Farm (the “FRI Property”). On October 25, 2013, FRI received your Notice of Preparation of a Draft Environmental Impact Report for Phase 2 (Upper Reach) of the Regional Salinity Management Project (the “Notice”), together with an Initial Study Checklist (the “Checklist”), which requests comments regarding the proposed construction of a twenty-four inch (24”) water pipeline across the FRI Property (the “Water Pipeline”).

FRI has several concerns regarding the construction of the proposed Water Pipeline that are not addressed in the Checklist. The Checklist indicates there would be “no impact” on the agricultural use of the FRI Property because the potential affected area is relatively small and “[c]rops affected are mostly short-rotation row crops, such that the pipeline alignment could be planted soon after construction is complete, minimizing loss of production.” However, these statements are inaccurate because they fail to adequately address the current conditions of the FRI Property and FRI’s planned use of the FRI Property.

FRI is currently party to a lease agreement in which the tenant has the right to use and occupy the FRI Property for the purpose of growing raspberry crops (the “Lease”). The Lease commences on February 1, 2014. Both parties to the Lease have already expended major resources to install the infrastructure needed to support raspberry crops on the FRI Property. The tenant will be planting raspberry crops in April 2014 and raising them in tunnels (see attached picture). The proposed Water Pipeline will disrupt the establishment of the new raspberry crops in the following four (4) significant ways.

First, installation of the Water Pipeline will impose costs to alter raspberry-related improvements on the FRI Property. The tunnels will be installed near to the edge of the FRI

Property, allowing for only a pickup truck to pass between the end of the tunnels and the FRI Property boundary line. Any Water Pipeline construction would require the disassembly of the end supports of the raspberry trellises and subsequent reassembly after installation of the Water Pipeline is completed. There will be significant costs to remove and reinstall the trellises.

Second, any delay in planting the raspberry crops because of the Water Pipeline installation will result in loss of production and revenue. Raspberry plants are planted once every three (3) years. Raspberries are not a “short-rotation row crop.” The raspberries produced on the FRI Property will be fresh product and sold in a retail setting. If the timing of the plantings is delayed, the loss of production and revenues would be great.

Third, construction activities related to installing the Water Pipeline will likely damage the raspberry crops, which will cause additional loss in revenue. In order to maintain good marketable crops, raspberries are handled under tightly controlled sanitary conditions. Dust from the road traffic and construction equipment necessary to complete the Water Pipeline will migrate up the tunnel houses and contaminate much of the marketable fruit. As a result, significant amounts of the raspberry crops would be rendered unfit for retail sale, causing substantial loss in revenue.

Finally, the proposed Water Pipeline is not a suitable location because it will disrupt the flow of FRI’s irrigation water and is in a wet and unstable area. The proposed location of the Water Pipeline is at the lowest elevation of the FRI Property. A drain ditch is located in the proposed location, which carries irrigation water off the FRI Property. The drain ditch is wet most of the year and there is no other way for the drain water to exit the FRI Property. Installation of the Water Pipeline could disrupt FRI’s drainage flow. In addition, the Water Pipeline improvements would be at risk of sinking or shifting due to the continuously wet soil.

Based on the foregoing, FRI requests that the Calleguas Municipal Water District (the “District”) does not locate the Water Pipeline on the FRI Property. Rather, FRI recommends that the District situate the Water Pipeline on the other (south) side of Los Angeles Avenue. This is a better location for the District because none of the restricting conditions found on the FRI Property exist there. This location will also will allow the Water Pipeline to terminate at the District’s proposed water treatment facility.

We appreciate your consideration of these comments. Feel free to call me if you have questions regarding the foregoing. I can be reached at (801) 328-3600.

Sincerely,

KIRTON McCONKIE



Tyler L. Buswell

Enclosure

cc: Kelly Tryon  
Rex Burgener  
Robert C. Hyde

Joe and Linda McGinnis  
655 Overlook Road  
Simi Valley, CA 93065  
(805) 581-2504



October 30, 2013

Mr. Eric Bergh  
Calleguas Municipal Water District  
2100 Olsen Road  
Thousand Oaks, CA 91360

Hello,

We received your "Notice of Preparation" letter, project No. 1102-1921, regarding our 3 acres of agricultural property located at 9745 Los Angeles Avenue in Moorpark, California.

According to present plans the work to be done will happen on the other side of the railroad tracks from our existing land and will therefore not impact our land in any way. We are glad to hear this as the land is and has been leased for many years to Sal Magdaleno of Magdaleno's Nursery as a business.

This business not only provides a living for Sal and his family but also for mine and my husbands in our retirement. It would be very detrimental to have this parcel of land disturbed as it would most definitely affect Sal's ability to sell his product.

Thank you for your consideration and please keep us apprised of all plans.

Sincerely,

A handwritten signature in cursive script that reads "L. McGinnis".

Linda McGinnis

## **APPENDIX C**

# **MITIGATION MONITORING AND REPORTING PROGRAM**

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## **MITIGATION MONITORING AND REPORTING**

Section 15074(d) of the State Guidelines for the Implementation of the California Environmental Quality Act and Section 21081.6 of the Public Resources Code, requires the lead agency (CMWD) to adopt a monitoring program to ensure mitigation measures are complied with during implementation of the project. In compliance with these requirements, a Mitigation Monitoring Program Implementation Table is provided below. This Table identifies the timing, monitoring methods, responsibility and compliance verification method for all mitigation measures identified in this EIR. Monitoring would be conducted by the CMWD's construction inspectors and qualified specialists under contract to the OVSD.

**SALINITY MANAGEMENT PIPELINE PHASE 2 (UPPER REACH)  
MITIGATION MONITORING PROGRAM – IMPLEMENTATION TABLE**

| Mitigation Measure  | Implementation Timing  | Monitoring Methods   | Monitoring Frequency                  | Party Responsible for Monitoring   | Method of Compliance Verification                                | Verification of Compliance |      |         |
|---|--|--|---------------------------------------|------------------------------------|--|----------------------------|------|---------|
|   |  |  |                                       |                                    |  | Signature                  | Date | Remarks |
| <b>BIOLOGICAL RESOURCES</b>   |  |  |                                       |                                    |  |                            |      |         |
| Breeding bird surveys shall be conducted by CMWD in May and June prior to the initiation of construction at all proposed creek crossings and pipeline segments adjacent to creeks or other native vegetation. Surveys shall include all suitable habitat within 500 feet of identified impact areas. No heavy equipment shall be operated within 200 feet of any active nest of migratory bird species.   | Prior to work at drainage crossings  | The inspector will ensure surveys are completed and active nests are avoided | Periodically as drainages are crossed | Calleguas Municipal Water District | CMWD staff will review monitoring reports                        |                            |      |         |
| <b>CULTURAL RESOURCES</b>   |  |  |                                       |                                    |  |                            |      |         |
| The following measures are provided to avoid or minimize any potentially significant impacts to buried prehistoric cultural resources along the Phase 2D alignment.<br><br>1. A qualified archeologist shall conduct an Extended Phase 1 subsurface excavation using shovel test pits to determine the presence or absence of cultural deposits within the Phase 2D APE that borders Site CA-VEN-631. A Chumash representative shall be retained to monitor the Extended Phase 1 excavation of this site. | Prior to the initiation of ground disturbance along the Phase 2D alignment | The inspector will ensure archeological work is completed                    | Following archeological field work    | Calleguas Municipal Water District | CMWD staff will review the Extended Phase I archeological report |                            |      |         |

**SALINITY MANAGEMENT PIPELINE PHASE 2 (UPPER REACH)  
MITIGATION MONITORING PROGRAM – IMPLEMENTATION TABLE**

| Mitigation Measure  | Implementation Timing  | Monitoring Methods  | Monitoring Frequency                     | Party Responsible for Monitoring   | Method of Compliance Verification                                | Verification of Compliance |      |         |
|---|--|---|--|------------------------------------|--|----------------------------|------|---------|
|   |  |   |  |                                    |  | Signature                  | Date | Remarks |
| <b>CULTURAL RESOURCES (Continued)</b>   |  |   |  |                                    |  |                            |      |         |
| <p>2. A qualified archeologist shall conduct an Extended Phase subsurface testing program at Site CA-VEN-1089. Prior to testing, additional background research should be undertaken regarding previous subsurface investigations. The findings of the background research shall be used to determine the extent and method of the Extended Phase 1. A Chumash representative shall be retained to monitor the Extended Phase 1 excavation of this site.</p> <p>3. Prior to initiation of pipeline installation activities, an archaeologist shall provide all workers associated with earth-disturbing activities an orientation regarding the probability of exposing cultural resources and directions as to what steps are to be taken if a find is encountered.</p>  | Prior to the initiation of ground disturbance along the Phase 2D alignment | The inspector will ensure archeological work is completed and orientation is completed  | Following archeological field work       | Calleguas Municipal Water District | CMWD staff will review the Extended Phase I archeological report |                            |      |         |
| <p>4. In the event that archaeological resources are exposed during project construction, all earth disturbing work within the vicinity of the find must be temporarily suspended until a qualified archaeologist has evaluated the nature and significance of the find. The CMWD shall be notified of any such find. A Chumash representative shall monitor any archaeological field work associated with Native American materials.</p> <p>5. If human remains are unearthed, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the Native American Heritage Commission. The CMWD shall also be notified of any such find.</p> | When cultural resources are discovered                                     | The inspector will ensure construction work is re-directed to avoid further disturbance of discovered resources, and ensure proper notifications are made | As needed to ensure requirements are met | Calleguas Municipal Water District | CMWD staff will review monitoring reports                        |                            |      |         |

**SALINITY MANAGEMENT PIPELINE PHASE 2 (UPPER REACH)  
MITIGATION MONITORING PROGRAM – IMPLEMENTATION TABLE**

| Mitigation Measure  | Implementation Timing   | Monitoring Methods  | Monitoring Frequency                      | Party Responsible for Monitoring          | Method of Compliance Verification                   | Verification of Compliance |      |         |
|---|---|---|---|---|---|----------------------------|------|---------|
|   |   |   |   |   |   | Signature                  | Date | Remarks |
| <b>CULTURAL RESOURCES (Continued)</b>   |   |   |   |   |   |                            |      |         |
| <p>The following measures are provided to avoid or minimize any potentially significant impacts to buried prehistoric cultural resources along the Phase 2E alignment.</p> <ol style="list-style-type: none"> <li>1. A qualified archeologist shall conduct a Phase 1 archaeological survey of the Phase 2E pipeline alignment prior to finalization of the alignment.</li> <li>2. If feasible, the Phase 2E alignment should be modified as needed to avoid potential impacts to Site CA-VEN-228 and any other resources identified during the archeological survey. If the CMWD determines that modification of the Phase 2E alignment is not feasible, a qualified archeologist shall conduct an Extended Phase 1 subsurface excavation using shovel test pits to determine the presence or absence of cultural deposits within the pipeline alignment that would affect Site CA-VEN-228. A Chumash representative shall be retained to monitor the Extended Phase 1 excavation of this site.</li> <li>3. Prior to initiation of pipeline installation activities, an archaeologist shall provide all workers associated with earth-disturbing activities an orientation regarding the probability of exposing cultural resources and directions as to what steps are to be taken if a find is encountered.</li> </ol> | <p>Prior to the initiation of ground disturbance along the Phase 2D alignment</p> | <p>The inspector will ensure archeological work is completed and orientation is completed</p> | <p>Following archeological field work</p> | <p>Calleguas Municipal Water District</p> | <p>CMWD staff will review archeological reports</p> |                            |      |         |

**SALINITY MANAGEMENT PIPELINE PHASE 2 (UPPER REACH)  
MITIGATION MONITORING PROGRAM – IMPLEMENTATION TABLE**

| Mitigation Measure   | Implementation Timing                  | Monitoring Methods  | Monitoring Frequency                     | Party Responsible for Monitoring   | Method of Compliance Verification         | Verification of Compliance |      |         |
|--|--|---|--|------------------------------------|---|----------------------------|------|---------|
|  |  |   |  |                                    |   | Signature                  | Date | Remarks |
| <b>CULTURAL RESOURCES (Continued)</b>  |  |   |  |                                    |   |                            |      |         |
| <p>4. In the event that archaeological resources are exposed during project construction, all earth disturbing work within the vicinity of the find must be temporarily suspended until a qualified archaeologist has evaluated the nature and significance of the find. The CMWD shall be notified of any such find. A Chumash representative should monitor any archaeological field work associated with Native American materials.</p> <p>5. If human remains are unearthed, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the Native American Heritage Commission. The CMWD shall also be notified of any such find.</p> | When cultural resources are discovered | The inspector will ensure construction work is re-directed to avoid further disturbance of discovered resources, and ensure proper notifications are made | As needed to ensure requirements are met | Calleguas Municipal Water District | CMWD staff will review monitoring reports |                            |      |         |

**SALINITY MANAGEMENT PIPELINE PHASE 2 (UPPER REACH)  
MITIGATION MONITORING PROGRAM – IMPLEMENTATION TABLE**

| Mitigation Measure   | Implementation Timing                   | Monitoring Methods   | Monitoring Frequency  | Party Responsible for Monitoring   | Method of Compliance Verification        | Verification of Compliance |      |         |
|--|---|--|-----------------------|------------------------------------|--|----------------------------|------|---------|
|  |   |  |                       |                                    |  | Signature                  | Date | Remarks |
| <b>TRANSPORTATION</b>  |   |  |                       |                                    |  |                            |      |         |
| CMWD shall pay Traffic Impact Mitigation fees to the Ventura County Transportation Department based on the projected number of average daily trips and the rates (\$/trip) in effect at the time construction is implemented. These fees would be used for roadway improvements to offset the contribution of the project to level of service impacts. | Prior to the initiation of construction | The project engineer will ensure traffic impact mitigation fees are paid | Prior to construction | Calleguas Municipal Water District | CMWD staff will file fee payment receipt |                            |      |         |