

Ventura County Watershed Protection District

Draft Environmental Impact Report
Fresno Canyon Flood Mitigation Project
Ventura County Watershed Protection District
Volume II – Appendices



Submitted by:



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December 2013

Fresno Canyon Flood Mitigation Project Draft Environmental Impact Report

Volume II Appendices

Prepared for:

Ventura County Watershed Protection District
800 South Victoria Avenue
Ventura, California 93009

Prepared by:

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December 2013

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APPENDIX A

Notice of Preparation (NOP), Initial Study, and Comments:



**NOTICE OF PREPARATION &
NOTICE OF PUBLIC SCOPING MEETING**
Fresno Canyon Flood Mitigation Project
Ventura County Watershed Protection District

What's Being Done?

The Ventura County Watershed Protection District (VCWPD), acting as Lead Agency, has determined that the proposed Fresno Canyon Flood Mitigation Project may have a significant effect on the environment and that an Environmental Impact Report (EIR) should be prepared.

The purpose of the project is to reduce the risk of flooding in the community of Casitas Springs. The VCWPD is proposing to construct a new bypass storm drain facility to transport floodwaters, sediment, and debris from Fresno Canyon to the Ventura River. The project is anticipated to start construction in 2015 and will take about eight months to complete.

Where is the Project Located?

The project is located in the community of Casitas Springs, about 1 mile south of Oak View and 5 miles north of the City of San Buenaventura, in unincorporated Ventura County.

Why A Public Notice?

The VCWPD would like to request assistance with identifying the scope and content of the environmental information that should be addressed in the EIR. The Initial Study analysis indicates that the project may result in adverse impacts to air quality, biological resources, water resources, scenic resources, paleontological and cultural resources, transportation and circulation, noise, geology and soils, and recreation.

Where Can You Review the Report?

The Initial Study is available for review at the following locations:

- | | | |
|----------------------------------|---------------------|--------------|
| 1. Watershed Protection District | 800 S. Victoria Ave | Ventura |
| 2. Ventura County Clerk | 800 S. Victoria Ave | Ventura |
| 3. Meiners Oaks Library | 114 N. Padre Juan | Meiners Oaks |
| 4. Oak View Library | 555 Mahoney Ave | Oak View |
| 5. Ojai Library | 111 E. Ojai Ave | Ojai |
| 6. Avenue Library | 606 N. Ventura Ave | Ventura |

Via internet: www.vcwatershed.org (click on "What's New").

How Can You Participate?

The public review period for this Initial Study is March 25, 2013 to April 23, 2013. All comments must be received by 5:00 PM, **April 23, 2013**. Please send written comments via mail to:

Ventura County Watershed Protection District
Attn: Elizabeth Martinez
800 South Victoria Avenue
Ventura, California 93009-1610

A Public Scoping Meeting to describe the proposed project and solicit public input on the scope of the EIR will be held on **Tuesday April 9, 2013 at 7:00 PM** in the Casitas Springs Community Center at 8437 Edison Drive, Casitas Springs.

Contact

For more information, contact Elizabeth Martinez, Environmental Planner, at 805-658-4374.

Thank you for your interest in this Watershed Protection District project!

Fresno Canyon Scoping Hearing Comments

April 9, 2013

- **David Burch:** Is the funding not allocated yet? Peter S. Answered with FEMA going thru NEPA process, and once that process is complete we will receive the grant contract.
- **David Burch:** once the project is approved, will the bid process be public for construction. Will the County hire a local contractor?
- **Dennis Lachaine:** Concerned about groundwater flow where Fresno Canyon used to be. The project needs to allow the groundwater flow to be unimpeded through the project area. Interruptions to groundwater flow by compaction during sewer line work caused impacts to property.
- **Rufus Fink:** Where will the traffic be rerouted during the project construction period?
- **Alan Davis:** Will street parking be interrupted? Many residents park on the street in the neighborhood.
- **Virgil Davis:** How will the new channel pipe be cleaned out? The current condition plugs quickly resulting in flooding. Self-cleaning may not be the outcome with a 2% gradient. Concerned about small flows building up debris in the pipe that will block the larger flows when they

occur. Will the pipeline be underground? Will the relocation of the sewer line require more of my property.

- **David Burch:** Is there going to be a debris basin at the entrance to catch debris and sediment before it enters the pipe?
- **Victoria Beecham :**Please explain what the drawings mean? Are elevations and cross sections available to view? What does staging area mean? How does the project affect the Edison slope area? Will we lose any street area?
- **Peti Tarrant:**Is there more export than import of construction materials?
- **Virgil Davis:** What is the fate of the existing channel? Will it be torn out and given back to the property owners?
- **Buz Bonsall:** Parkview drain will also be draining to the existing Fresno Channel that stays in place.
- **Ginnette Waterman:** Agrees Alt 1 would be horrendous. The last Caltans repair to Hwy 33 was poor and increased noise due to a bump meant to prevent flooding. Alt 2: Are there lines of sight from streets to Hwy 33 that will be improved or impaired?
- **Virgil Davis:** How long with the project take during construction? (project duration)

FRESNO CANYON FLOOD MITIGATION PROJECT

Initial Study



Prepared for:

Ventura County Watershed Protection District
800 South Victoria Avenue
Ventura, California 93009

Prepared by:

Impact Sciences, Inc.
803 Camarillo Springs Road, Suite A
Camarillo, California 93012

March 2013

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A. PROJECT DESCRIPTION

A.1 Project Title

Fresno Canyon Flood Mitigation Project

A.2 Lead Agency Name and Address

Ventura County Watershed Protection District
800 South Victoria Avenue
Ventura, California 93009-1610

A.3 Initial Study Contact Person

Elizabeth Martinez
Environmental Planner
Ventura County Watershed Protection District
800 South Victoria Avenue
Ventura, California 93009-1610
Phone: (805) 658-4374
Fax: (805) 654-3350
Email: Elizabeth.Martinez@ventura.org

A.4 Description of Proposed Project

A.4A Project Location

The Fresno Canyon Flood Mitigation Project is located in the community of Casitas Springs, approximately 1 mile south of Oak View and 5 miles north of the City of San Buenaventura, in the unincorporated area of Ventura County, California. A portion of the project extends into an isolated area of the Ventura River that is located within the incorporated boundary of the City of Ventura. The project site is located approximately 0.75 mile northwest of the State Route (SR) 33/Casitas Vista Road intersection. **Figure 1, Project Vicinity**, illustrates the location of the project site and surrounding areas.

Fresno Canyon is a tributary to the Ventura River, with a drainage area of almost 1,100 acres with a 100-year peak clear flow of 1,453 cubic feet per second (cfs). The upper half of this watershed is on steep, highly erodible slopes heavily grown with trees and brush. The bulking factor used for the 100-year flow is 1.57 bringing the bulked 100-year peak flow to 2,281 cfs. The existing lower Fresno Canyon flood control channel, a 750-foot concrete channel, was built in the 1970s to convey Fresno Canyon runoff from the natural channel to the Ventura River and was designed for a clear flow of 700 cfs, which is considered to be the 50-year event at the time of consideration.

The County has acquired three parcels currently occupied by single-family residential development in order to allow for a right-of-way that has the proper alignment for the conveyance pipeline. The early acquisition of right of way for this project has not influenced the environmental assessment, including the decision relative to the need to construct the project or the selection of a specific location.

A.4B Proposed Project

Project Description and Features

The Ventura County Watershed Protection District (VCWPD) is proposing to construct a bypass storm drain facility to transport floodwaters, sediment, and debris from Fresno Canyon to the Ventura River to reduce the risk of flooding in the community of Casitas Springs. The facility will be designed to convey the fully bulked flows resulting from the 100-year flood event. The proposed project includes two design alternatives: (1) a 12-foot-wide rectangular conveyance channel with box culverts under SR 33 and the Ojai Valley Trail constructed using an open trench method, and (2) a 12-foot diameter reinforced concrete (RC) conveyance pipe installed via horizontal boring beneath SR 33 and via open trench method for the remaining approximately 395 linear feet. These two proposed project alternative construction designs are described further below. The VCWPD anticipates selecting one of the two alternative construction designs to carry forward as the proposed project in the Draft EIR analysis.

Alternative 1: Figure 2, Project Alternative 1, shows the proposed facilities that would be constructed under this alternative. The facility would consist primarily of an extended box culvert and an open rectangular channel (known as a bypass route). The extended box culvert would begin with an inlet in Fresno Canyon approximately 300 feet east of SR 33 and run west under SR 33 to Edison Drive, and a rectangular concrete channel would extend from this point to the Ventura River. Where the proposed bypass and existing natural channel diverge, a notch in the north RC channel wall would allow emergency overflows to leave the bypass channel and enter the natural channel. Concrete rock riprap would be placed in the natural channel (about 50 feet wide at top and 30 feet long) to protect against erosion and would essentially function as an emergency spillway.

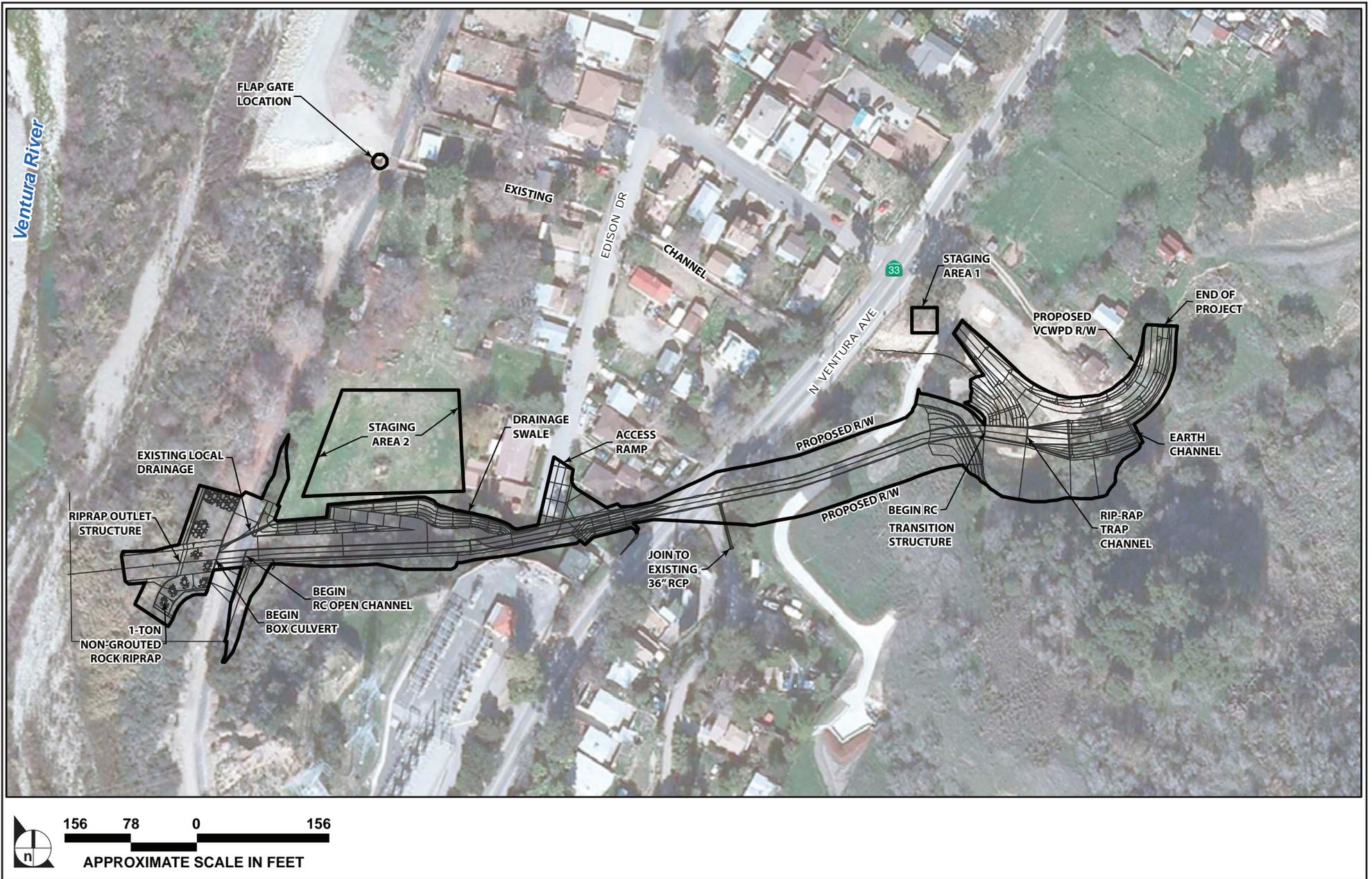
The entire length of the facility would be approximately 1,400 feet and would comprise (from upstream to downstream) an entrance structure approximately 300 feet long, a box culvert approximately 625 feet long, a 12-foot-wide rectangular channel approximately 270 feet long, an approximately 40-foot-long ungrouted rock riprap outlet to the Ventura River, and a graded flow path approximately 70 feet long. Alternative 1 would require traffic detour during open trench method installation of the RC box culvert under SR 33.



SOURCE: USGS, 2012

FIGURE 1

Project Vicinity



SOURCE: Impact Sciences, Inc., January 2013

FIGURE 2

Project Alternative 1

The channel would discharge into the Ventura River just west of the Ojai Valley Trail. A 30-foot-long (12 feet wide by 9 feet high) box culvert would be constructed below the Ojai Valley Trail. A 120-foot-long by 5-foot-deep by 6-inch-wide reinforced concrete cutoff wall would be installed along the downstream edge of the Ojai Valley Trail beginning about 70 feet north of and ending about 35 feet south of the conveyance structure.

Alternative 1 would include two maintenance roads. One maintenance road would be approximately 500 feet long and immediately north of the open rectangular channel. An additional 100 feet of the maintenance road would be constructed on top of the culvert and then run north where it would terminate in an access ramp approximately 100 feet long with a 10 percent grade. The maintenance road would be 15 feet wide for most of its length and would culminate at the Ojai Valley Trail at its western end. A private access road would be incorporated into the maintenance road for use by a neighboring property owner. A fence would be built around the access road to prevent public access to the facility. The second maintenance road would be constructed at the eastern end of the facility and immediately north of the entrance structure. It would be approximately 400 feet long and connect to an existing access route from SR 33.

Gas, water, electricity, sewer, and drainage conduits that cross Alternative 1 would be relocated or avoided as part of the proposed project. A 20-inch-diameter high-pressure gas line runs parallel to and east of SR 33 where it crosses Fresno Canyon. The box culvert would pass under this conduit with approximately 6 feet of clearance. Two smaller gas lines (6-inch-diameter and 10-inch-diameter) within the SR 33 right-of-way would require relocation. The water lines that exist in the area would be avoided. The most costly utility relocation would involve approximately 307 linear feet of 21-inch trunk sewer operated by the Ojai Valley Sanitary District. This sewer line would be relocated approximately 12 feet northward and the materials would be upgraded to ensure future access and reduce the risk of maintenance problems.

Alternative 2: The proposed facilities that would be constructed under this alternative are shown in **Figure 3, Project Alternative 2**. Alternative 2 avoids the need to detour traffic on SR 33 by installing a 12-foot-diameter RC pipe underneath SR 33 using a horizontal boring method. At the upstream end, this alternative includes a 265-foot floodwall above the northwest bank of the existing natural canyon. To protect the floodwall from potential scour damage, non-grouted rock riprap would be placed on the adjacent portion of the northwest bank. The inlet consists of a 50-foot-long rock riprap trapezoidal channel with 2 to 1 horizontal to vertical (2H:1V) side slopes (50-foot top width, 11-foot bottom width) and approximately 100 linear feet of RC transition structure adjacent to the existing detention basin.

Where the proposed bypass and existing natural channel diverge, a notch in the north RC channel wall would allow emergency overflows to leave the bypass channel and enter the natural channel. Concrete rock riprap would be placed in the natural channel for a length of 40 feet to protect against erosion and

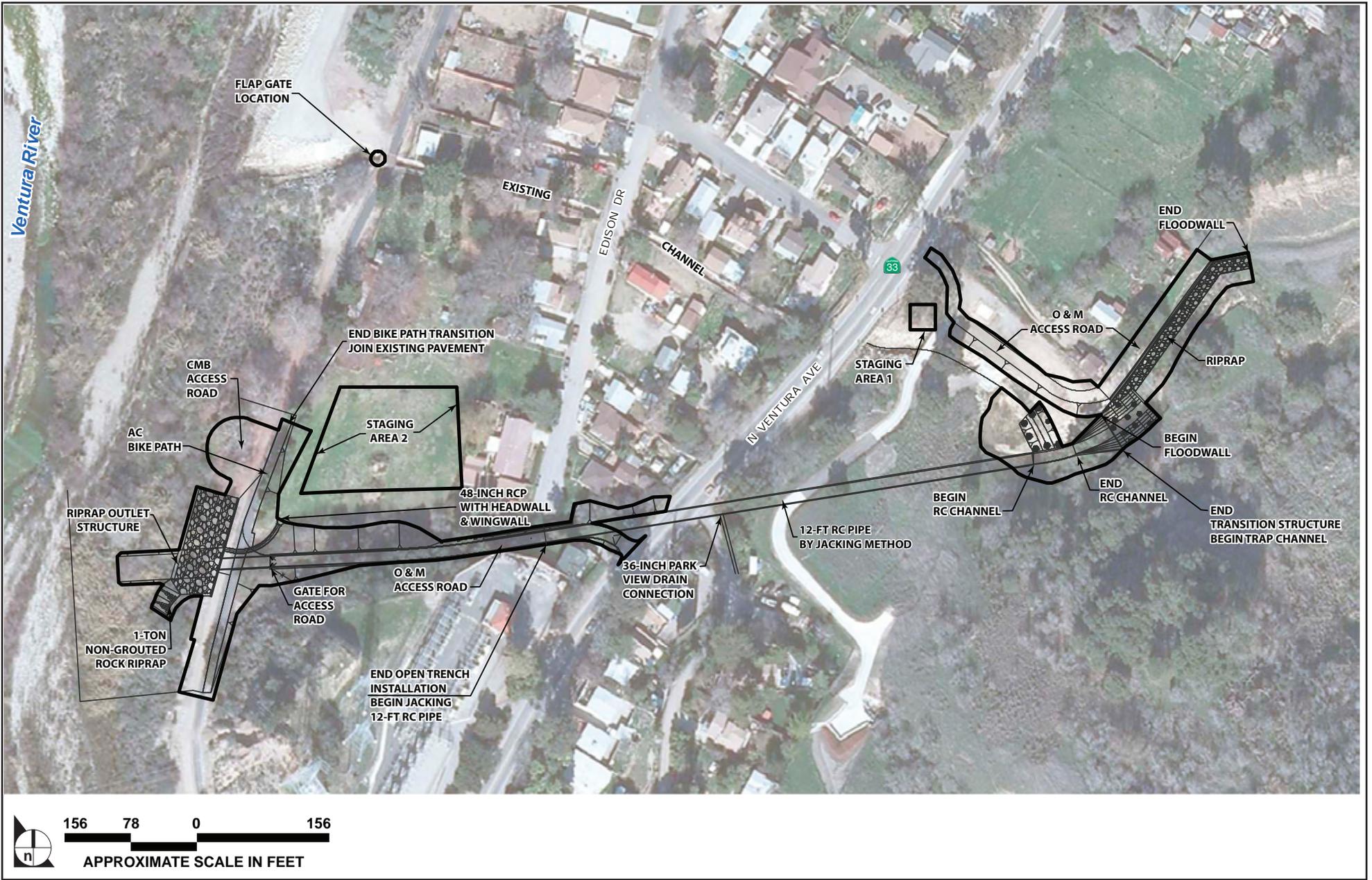
would essentially function as an emergency spillway. This modified natural channel section would be trapezoidal with 2H:1V side slopes, top width of 51 feet, and bottom width of 15 feet.

The transition structure connects to approximately 580 linear feet of 12-foot diameter RC pipe which would be jacked under SR 33 using a horizontal boring method. The jacking would be continued for about 145 linear feet west of SR 33, where the pipe would be day lighted and from there on it would be installed by open trench method for the remainder of the distance (i.e., approximately 395 feet) to the outlet apron comprised of 1-ton non-grouted rock riprap to be constructed on the left bank of the Ventura River. The existing retaining wall located along the base of slope at the terminus of Edison Drive would be removed and a new retaining wall (of varying height) would be constructed along the pipe conveyance alignment (**Figure 3**).

A 120-foot-long by 6-inch-wide RC retaining wall (height varies) would be installed along the downstream edge of the Ojai Valley Trail beginning about 70 feet north of and ending about 35 feet south of the conveyance structure. The retaining wall is required to support the trail, a portion of which would need to be elevated to clear the proposed 12-foot-diameter pipe. The wall would include an underground RC footing (dimensions to be determined based on a pending geotechnical investigation) for proper anchoring. This footing would provide protection similar to the 120-foot-long cutoff wall in Alternative 1.

Alternative 2 would require relocation of the existing 21-inch sewer line operated by the Ojai Valley Sanitation District (OVSD). As part of Alternative 2, a new sewer line would be constructed 1 to 2 feet north of the existing line to allow for OVSD access and maintenance. The old line would be abandoned in place. A new sewer manhole would be added at the end of Edison Drive and another manhole would be added along the sewer line just west of the Ojai Valley Trail and south of the new outlet.

Alternative 2 would include two maintenance roads. A 15-foot-wide maintenance access road would extend from SR 33 west to the outlet structure. The road would be surfaced with 6-inch aggregate base. A vehicle turnaround area would be created on uplands north of the outlet structure to facilitate maintenance of the outlet invert. The voids within a 15-foot-wide portion of the non-grouted rock on the outlet structure's north slope would be filled with 6-inch aggregate base to create a drivable ramp from the turnaround area down to the outlet invert. The access ramp would lie adjacent and parallel to the Ojai Valley Trail. A second maintenance road would be constructed at the eastern end of the facility and immediately north of the proposed floodwall. It would be approximately 265 feet long and connect to an existing access route from SR 33.



SOURCE: Impact Sciences, Inc., November 2012

FIGURE 3

Project Alternative 2

Project Design Features Common to Both Alternatives

Immediately west of the Ojai Valley Trail, the box culvert (Alternative 1) or pipe (Alternative 2) would connect to a 40-foot-long trapezoidal outlet apron on the east bank of the Ventura River. The apron would comprise 1-ton non-grouted rock riprap and would be 30 feet wide at the invert, 50 feet wide at the top, and 4 feet deep. A 4-foot-wide non-grouted rock cutoff wall that would extend 5 feet deeper underground would further stabilize the downstream edge of the outlet apron, increasing the total depth of rock at this edge to 9 feet. The ground immediately west of the outlet apron would be bladed or graded for approximately 70 feet to facilitate flows from the facility into the Ventura River.

The outlet apron would tie into adjacent higher ground by continuing the non-grouted 1-ton rock riprap and leading edge rock cutoff wall to the immediate north for a distance of 70 feet. To the south, a 4-foot thickness of non-grouted 1-ton rock would curve over a distance of about 40 feet to match the existing east bank of the Ventura River. The rock bank protection toe would be buried 9 feet below the channel bottom. A 3-foot-wide by 5-foot-deep non-grouted 1-ton rock cutoff wall would further stabilize the downstream end of the bank protection, increasing the overall depth of rock to 9 feet at that location.

A pair of existing 42-inch corrugated metal pipe culverts conveying flow from private property east of the Ojai Valley Trail would be replaced with a single 48-inch RC pipe terminating at the proposed outlet. Alignment of the new pipe varies slightly between the two alternatives.

To prevent the backwater effect from the Ventura River in the existing flood-control channel, a flapgate would be constructed at the outlet of the flood-control channel that would prevent river water from traveling up the channel. Because the flood-control channel serves as a wildlife corridor from the Ventura River to Fresno Canyon, a pathway around the flapgate would be constructed to allow wildlife to enter the channel.

The existing 36-inch Parkview Drain located southeast of SR 33 would be connected to the new Fresno Canyon conveyance structure.

To summarize, project construction features include:

- New inlet structure with emergency spillway/rock riprap protection in Fresno Canyon, upstream (east) of SR 33;
- Alternative 2 only – flood wall and adjacent rock riprap revetment along the northwest bank of the existing natural canyon (about 242 feet long);
- Alternative 1 only – box culvert (approximately 600 feet long);

- Alternative 1 only – rectangular concrete channel (approximately 300 feet long);
- Alternative 1 only – box culvert at Ojai Valley Trail crossing;
- Alternative 2 only – 12-foot diameter RC conveyance pipe (approximately 975 feet long);
- Alternative 1 only – RC cut-off wall along the west edge of the Ojai Valley Trail (about 120 feet long);
- Alternative 2 only – RC retaining wall with footing along the west edge of the Ojai Valley Trail (about 120 feet long);
- Outlet facility with tie-in to adjacent high ground on the north and south, cut-off wall along the west edge, and cut-off wall at the downstream edge of the south tie-in, all consisting of non-grouted 1-ton rock riprap;
- Graded flow path extending 70 feet westward from the outlet facility;
- New RC pipe culvert to replace existing culverts draining private property east of the Ojai Valley Trail;
- Alternative 1 only – maintenance road with tow access ramps and exclusionary fencing/gates from the Ojai Valley Trail to Edison Road;
- Alternative 2 only – maintenance road from SR 33 west to the outlet structure with turnaround area on uplands immediately west of the Ojai Valley Trail;
- Maintenance road for access from SR 33 east to the new inlet structure (specific layout varies for each alternative);
- Flapgate on existing Fresno Canyon outlet with wildlife pathway.

The Alternative 1 description is based on the 50-percent construction drawing dated June 21, 2012. The Alternative 2 description is based on the 50-percent construction drawing dated October 26, 2012. Project construction is tentatively anticipated for 2015 and will take approximately eight months to complete. A short segment of the Ojai Valley Trail would be temporarily detoured around the active construction area for approximately five to six weeks to accommodate construction of the outlet structure and flood conveyance features nearest to the trail. As-built plans and an updated Operations, Maintenance, and Repair Manual (if needed) shall be completed within six months of project construction completion and submitted to all regulatory agencies for comment and approval.

Operations and Maintenance

A draft operation, maintenance and repair manual has been prepared for the proposed project that identifies all actions that will be required to operate and maintain all aspects of the flood mitigation project including both the existing box culvert and new bypass conveyance. The draft manual has been

updated to address both proposed design alternatives and will be finalized to meet all the requirements of the final approved project.

Operations involve all activities required to maintain unobstructed flow within the bypass channel, inlet, and outlet. The system is designed to operate passively, without manual or remote actions. Periodic inspections by qualified staff will detect and quantify any conditions within the bypass channel system, including access roads, which either adversely affect the project's authorized function, or adversely affect the natural resources of either Fresno Creek or the Ventura River. Maintenance is defined as the routine conditioning of system components and the correction of any conditions within the bypass system that might adversely affect the project's authorized function. Inspections and maintenance shall be documented by the VCWPD and, if required, may be reported to regulatory agencies.

Inspection criteria have been outlined in the manual to aid the inspector in determining if deviations from the design have occurred. Typical corrective measures are outlined in the manual, but the superintendent shall be responsible for determining the appropriate maintenance action to restore any damaged feature or deviated condition back to operable conditions and for assuring that the corrective maintenance is carried out. If the corrective action does not comply with the conditions set forth in the project permits or exceeds the original project footprint with either temporary or permanent impacts, additional authorization may be required prior to taking such maintenance actions.

Routine maintenance actions have also been outlined for each project element to ensure proper operation and longevity. Basic maintenance actions will include, but are not limited to, periodic concrete patching and repairs, debris and sediment removal and lubrication, adjustment, cleaning and painting of the flapgate and other metal parts.

In addition to operational maintenance of the flood control structures, the manual also outlines requirements for maintenance and operation of the access roads and fencing around the flood control structures. Steps to be taken in case of emergency are also outlined.

All maintenance activities at the Fresno Canyon Flood Mitigation Project would occur in compliance with the appropriate Environmental Best Management Practices (BMPs) developed as part of the VCWPD's Operation, Maintenance, and Repair Manual.

The District has formally developed 25 environmental BMPs to reduce the environmental effects of its routine maintenance program for this and other flood control projects. The BMPs represent precautions and procedures to be used when planning and implementing maintenance activities that could affect sensitive environmental resources including wetlands, riparian habitat, aquatic habitat, Threatened and Endangered species, species of special concern, water quality, and hydraulic conditions in the watershed.

The BMPs are designed to be feasible and practical. They will not curtail, reduce, or otherwise inhibit the District's maintenance requirements and activity guidelines. Implementation of the BMPs is standard practice for the maintenance crews. The following BMPs were originally taken from the Program EIR with some additional clarification language added for this project. The regulatory agencies include: the California Department of Fish and Wildlife (CDFW), Los Angeles Regional Water Quality Control Board (LARWQCB), US Army Corps of Engineers (USACE), US Fish and Wildlife Service (USFWS), and National Marine Fisheries Service (NMFS). Below is a summary of the BMPs. BMPs not included herein are not applicable to this specific project. Full BMP descriptions are available in the manual.

- BMP 1 Avoid Channel Work during the Rainy Season
- BMP 2 Prevent Discharge of Silt-Laden Water during Concrete Channel Cleaning
- BMP 3 Location of Temporary Stockpiles
- BMP 4 Survey for Habitat Prior to Routine Maintenance Work
- BMP 5 Survey for Steelhead Migration Conditions and Sensitive Aquatic Species
- BMP 6 Survey for Steelhead Rearing Habitat and Sensitive Aquatic Species
- BMP 8 Avoid Disturbance to Native Beach or Wetland Species
- BMP 9 Aquatic Pesticide BMPs
- BMP 12 Leave Herbaceous Wetland Vegetation in Channel Bottom (Not Applicable in Concrete Box or Concrete Channel Sections)
- BMP 13 Maximum 15-foot Vegetation-Free Zone at the Toe of the Bank
- BMP 14 Avoid Road Base Discharge
- BMP 15 Mitigate/Replace Temporary Impacts to Habitat
- BMP 16 Oak Tree Mitigation Ratio
- BMP 17 Concrete Wash-Out Protocols
- BMP 18 Water Diversion Guide
- BMP 20 Implementation of Integrated Pest Management Program
- BMP 21 Avoid Spills and Leaks
- BMP 22 Biological Surveys in Appropriate Habitat Prior to Vegetation Maintenance
- BMP 23 Invasive Plant Removal Protocols
- BMP 24 Air Quality BMPs

- BMP 25 Construction Noise BMPs

A.4C Project Objective

The existing flood control channel in Casitas Springs is inadequate for the proper transport of water and debris associated with flood events. Storm water and debris flows from Fresno Canyon flooded the community of Casitas Springs in Ventura County, California, three times between 1995 and 2005, damaging dozens of homes and requiring the closure of SR 33 for up to 2 days during each flood event. An average of more than 24,500 vehicles travel on SR 33 in the Casitas Springs area every day. Residential areas on both sides of Fresno Canyon are subject to flooding at an estimated frequency of once every 10 years. In addition, the flood control channel clogs and overflows frequently, and water from the Ventura River frequently flows up the channel, creating a “backwater effect” that floods property adjacent to the channel.

The objective of the proposed project is to reduce the risk of flood hazards in Casitas Springs and on SR 33. The Department of Homeland Security’s Federal Emergency Management Agency (FEMA) proposes to provide Pre-disaster Mitigation (PDM) Program federal financial assistance (PDM-PJ-09-CA-2007-013) to the VCWPD through the California Emergency Management Agency in support of the Fresno Canyon Flood Mitigation Project to reduce the risk of flooding in Casitas Springs and on SR 33. The PDM Program assists states and communities by providing federal financial assistance to implement sustained, pre-disaster, natural-hazard mitigation programs to reduce the risk of injury and damage from natural disasters and also to reduce reliance of funding from disaster declarations.

A.4D Project Benefits

The proposed project would construct a bypass storm drain facility to transport floodwater, sediments, and debris from Fresno Canyon to the Ventura River to reduce the risk of flooding in the community of Casitas Springs. The facility will be designed to convey fully bulked flows resulting from the 100-year flood event. Future storm events in the Casitas Springs area are likely to result in more severe flooding, and the cost of repairing the damage from 100- or 50-year flood events to residences and other property in Casitas Springs is projected to exceed \$2 million. Implementation of the proposed project would greatly reduce flood-related property damage and reduce the likelihood of temporary closure of SR 33 due to flood inundation.

A.4E Surrounding Land Uses and Setting

Surrounding lands include vacant land and existing commercial and residential development. Properties adjacent to the northern portion of the project area contain existing commercial and residential development. Lands adjacent to the project area are designated Urban Residential with two to four dwelling units per acre (UR 2-4), UR-6-10, and Rural Residential with 2-acre minimum lots (RR-2). Land within the jurisdiction of the City of Ventura is located east of the project area. An electrical substation in

this area is adjacent to the project area. The VCWPD has acquired three parcels, two of which have single-family residential houses and the third is a vacant lot, in order to allow for a right-of-way that has the proper alignment for the conveyance pipeline. The early acquisition of right of way for this project has not influenced the environmental assessment, including the decision relative to the need to construct the project or the selection of a specific location.

A.5 Project Site Assessor’s Parcel Numbers, Zoning, and General Plan Land Use Designations

The proposed Fresno Canyon flood control project is located within unincorporated Ventura County. Therefore, the proposed project is subject to the management direction of the Ventura County General Plan, which contains goals, policies, and programs that are used to evaluate proposed projects within the County. General Plan programs are a coordinated set of measures to be implemented by County staff and other public agencies to carry out the goals and policies. In accordance with the Ventura County General Plan, the proposed project site is zoned as Open Space. The project site is located within the Ojai Valley Area Plan. The most relevant goals and policies of the applicable General Plans are listed below. The proposed project does not conflict with implementation of the General Plan programs, and the proposed project is considered to be consistent with all of the General Plan and Area Plan goals and policies. **Table 1, Land Use and Zoning Designations for Project Site Parcels**, provides land use and zoning designations provided for the project site in the General Plan, Ojai Valley Area Plan, and Zoning Map and indicates the current ownership of the affected parcels. For those parcels not owned by VCWPD, the acquisition of easements will be needed for project development.

**Table 1
Land Use and Zoning Designations for Project Site Parcels**

APN	Owner	Site Address	Zoning	General Plan Land Use Designation	Ojai Valley Area Plan Land Use Designation
061-0-230-175	VCWPD	8220 Edison Drive	R-1 6,000 sf	Existing Community	UR 6-10
061-0-230-155	VCWPD	8195 N. Ventura Ave.	R-1 6,000 sf	Existing Community	UR 6-10
061-0-230-365	VCWPD	8195 N. Ventura Ave.	R-1 6,000 sf	Existing Community	UR 6-10
061-0-230-040	Stuart Sackley	8225 Edison Drive	RE-1 ac	Existing Community	UR 2-4
061-0-230-340	Wilmetta Davis	8251 Edison Drive	RE-1 ac	Urban	UR 2-4
035-0-140-075	Shull Bonsall	--	AE-40 ac	Open Space	Open Space

sf = square feet; ac = acres

Source: Ventura County Resource Management Agency 2013.

A.5A Ventura County General Plan

- Hazards Goals, Section 2.1.1
 - (2) Protect public health, safety, and general welfare from identified hazards and potential disasters.
 - (3) Shield public and private property and essential facilities from identified hazards and potential disasters.
 - (4) Minimize loss of life, injury, damage to structures, and economic and social dislocations resulting from identified hazards and potential disasters.

A.5B Ojai Valley Area Plan

- Hazards Goal, Section 2.2
 - (1) Minimize the risk of loss of life, injury, damage to property, and economic and social dislocations resulting from flood hazards.

A.6 Lead and Participating Agencies Names and Addresses

The existing Fresno Canyon flood control channel and the proposed new project facilities would be operated and maintained by the VCWPD, which is a special district and a department of the Ventura County Public Works Agency. The VCWPD is the California Environmental Quality Act (CEQA) Lead Agency for the proposed project. As mentioned above, FEMA proposes to provide Pre-disaster Mitigation Program federal financial assistance to the VCWPD through the California Emergency Management Agency in support of the Fresno Canyon Flood Mitigation Project, and as such FEMA is the federal lead agency for the project. Provided below is the contact information for the local and federal lead agencies and the participating state agency.

Ventura County Watershed Protection District
800 South Victoria Avenue
Ventura, California 93009-1610

US Department of Homeland Security
Federal Emergency Management Agency
1111 Broadway, Suite 1200
Oakland, California 94607-4052

California Emergency Management Agency
Hazard Mitigation Grants Branch
3650 Schriever Avenue,
Mather, California 95655

A.7 *Other Agency Approvals That May be Required*

Based on the results of the jurisdictional delineation, the following agency approvals/permits may be required:

- US Army Corps of Engineers, Section 404 Permit (Clean Water Act)
- California Department of Fish and Wildlife, Section 1600 Streambed Alteration Agreement (California Fish and Game Code)
- Los Angeles Regional Water Quality Control Board, Section 401 Water Quality Certification (Clean Water Act)
- National Marine Fisheries Service and US Fish and Wildlife Service Section 7 Consultation

California Department of Transportation. The California Department of Transportation (Caltrans) is the steward of California's state highways and acts to protect the public's investment in the California highway system. An encroachment permit must be obtained from Caltrans for all proposed activities for placement of encroachments within, under, or over the state highway rights of way. An "encroachment" is defined in Section 660 of the California Streets and Highways Code as "any tower, pole, pole line, pipe, pipeline, billboard, stand or building, or any structure, object of any kind or character not particularly mentioned in the section, or special event, which is in, under, or over any portion of the highway." Thus, the VCWPD would require a Caltrans encroachment permit for installation of the proposed conveyance pipeline under SR 33.

Ventura County Environmental Health Division. The Ventura County Environmental Health Division is responsible for ensuring conformance with state laws and County ordinances pertaining to the protection of public health, including programs related to food protection, hazardous materials, hazardous waste, individual sewage disposal systems, land use, medical waste, ocean water quality monitoring, recreational health, solid waste, underground fuel tanks, and vector control. Prior to the start of construction the VCWPD would contact the Ventura County Environmental Health Division to establish if any type of permit or approval is required, and would acquire the permit if needed.

Ventura County Transportation Department. Approval may be required from the Ventura County Public Works Agency, Transportation Department, if project activities require any temporary lane or road closures, or other temporary traffic diversions, on County roads. A Traffic Control Plan would be required for any road closure, partial road closure, or detours, and an Oversized Vehicle Permit would be required for any oversized and heavy loads on County roads. In addition, an Encroachment Permit would be required from the Ventura County Transportation Department for any work or traffic impacts to County roads. Prior to the start of construction the VCWPD would coordinate with the Ventura County Transportation Department to determine if any permits are required, and would acquire the permits if needed.

B. INITIAL STUDY CHECKLIST

	ISSUE (Responsible Department)	PROJECT IMPACT				CUMULATIVE IMPACT			
		DEGREE OF EFFECT*				DEGREE OF EFFECT*			
		N	LS	PS -M	PS	N	LS	PS -M	PS
RESOURCES:	1. Air Quality (APCD)				X				X
	2. Water Resources (PWA):								
	A. Groundwater Quantity	X				X			
	B. Groundwater Quality		X				X		
	C. Surface Water Quantity		X				X		
	D. Surface Water Quality		X				X		
	3. Mineral Resources (PInG.):								
	A. Aggregate	X				X			
	B. Petroleum	X				X			
	4. Biological Resources				X				X
	5. Agricultural Resources:								
	A. Soils (PInG.)	X				X			
	B. Land Use Incompatibility (Ag. Dept.)	X				X			
	6. Scenic Resources (PInG.)				X				X
	7. Paleontological Resources				X				X
	8. Cultural Resources:								
	A. Archaeological				X				X
B. Historical (PInG.)	X				X				
9. Coastal Beaches and Sand Dunes	X				X				
HAZARDS:	10. Fault Rupture (PWA)	X				X			
	11. Ground Shaking (PWA)				X				X
	12. Liquefaction (PWA)				X				X
	13. Seiche & Tsunami Hazards (PWA)	X				X			
	14. Landslide/Mudflow (PWA)				X				X
	15. Expansive Soils (PWA)				X				X
	16. Subsidence (PWA)	X				X			
	17. Hydraulic Hazards:								
	A. Non-FEMA (PWA)				X				X
B. FEMA (WPD)				X				X	

	ISSUE (Responsible Department)	PROJECT IMPACT DEGREE OF EFFECT*				CUMULATIVE IMPACT DEGREE OF EFFECT*			
		N	LS	PS -M	PS	N	LS	PS -M	PS
PUBLIC FACILITIES/ SERVICES:	18. Fire Hazards (Fire)		X				X		
	19. Aviation Hazards (Airports)	X				X			
	20. Hazardous Materials/Waste:								
	A. Hazardous Materials (EH / Fire)	X				X			
	B. Hazardous Waste (EH)	X				X			
	21. Noise and Vibration			X				X	
	22. Daytime Glare	X				X			
	23. Public Health (EH)	X				X			
	24. Greenhouse Gases (APCD)				X				X
	25. Community Character (Plng.)	X				X			
	26. Housing (Plng.)		X			X			
	27. Transportation/Circulation:								
	A. Roads and Highways:								
	(1) Level of Service (PWA)				X				X
	(2) Safety / Design of Public Roads (PWA)		X			X			
	(3) Safety / Design of Private Access Roads (Fire)		X			X			
	(4) Tactical Access (Fire)	X				X			
	B. Pedestrian / Bicycle Facilities (PWA / Plng.)		X			X			
	C. Bus Transit				X				X
	D. Railroads	X				X			
	E. Airports (Airports)	X				X			
	F. Harbors (Harbors)	X				X			
	G. Pipelines		X				X		
	28. Water Supply:								
	A. Quality (EH)	X				X			
	B. Quantity (PWA)	X				X			
	C. Fire Flow (Fire)	X				X			
	29. Waste Treatment / Disposal:								
	A. Individual Sewage Disposal Systems (EH)		X			X			
B. Sewage Collection / Treatment Facilities (EH)		X			X				
C. Solid Waste Management (PWA)		X				X			
D. Solid Waste Facilities (EH)	X				X				

	ISSUE (Responsible Department)	PROJECT IMPACT				CUMULATIVE IMPACT			
		DEGREE OF EFFECT*				DEGREE OF EFFECT*			
		N	LS	PS-M	PS	N	LS	PS-M	PS
PUBLIC FACILITIES/ SERVICES: (CONT.):	30. Utilities		X				X		
	31. Flood Control / Drainage:								
	A. WPD Facilities / Watercourses (WPD)				X				X
	B. Other Facilities / Watercourses (PWA)		X				X		
	32. Law Enforcement/Emergency Svs. (Sheriff)	X				X			
	33. Fire Protection (Fire):								
	A. Distance/Response Time	X				X			
	B. Personnel/Equipment/Facilities	X				X			
	34. Education:								
	A. Schools	X				X			
	B. Libraries (Lib. Agency)	X				X			
	35. Recreation (GSA)		X			X			

DEGREE OF EFFECT:

N = No Impact

LS = Less Than Significant

PS-M = Potentially Significant Impact Unless Mitigation Incorporated

PS = Potentially Significant Impact

AGENCIES:

- APCD - Air Pollution Control District
- GSA - General Services Agency
- Harbors - Harbor Department
- Lib. Agency - Library Services Agency
- Airports - Department Of Airports
- Fire – Fire Protection District
- PWA - Public Works Agency
- Plng. - Planning Division
- WPD – Watershed Protection District
- Sheriff - Sheriff's Department
- EH - Environmental Health Division
- Ag. Dept. - Agricultural Department

C. ENVIRONMENTAL ANALYSIS AND DISCUSSION OF IMPACTS

This section evaluates the potential environmental impacts of the proposed project. The analysis of potential impacts is consistent with methodology and impact threshold criteria presented in the Ventura County *Initial Study Assessment Guidelines*. Impact analysis is organized by environmental topic (e.g., air quality, water resources, etc.). Cumulative impacts have been assessed to determine if the project’s incremental contribution would be considerable, such that an environmental impact report would be required. Cumulative impacts were considered significant if project-specific impacts would be significant. The determinations of significance for project-level and cumulative impacts are summarized in the Initial Study Checklist provided in **Section B**.

Table 2, provides a summary of the 15 projects located within approximately 5 miles of the proposed project.

**Table 2
County of Ventura Cumulative Projects Located within 5 Miles of the Project**

Permit Number	Permit Type/Status	Location	Description
LU09-0082	Planned Development	North Ventura Avenue	Planned Development Permit LU09-0082 is to legalize outdoor storage of recreational vehicles. The subject property is 6.63 acres of which 2.74 acres is proposed for the development. The remaining 3.89 acres will be subject to a restrictive covenant for environmentally sensitive habitat preservation related to Conditional Certificate of Compliance SD06-0046. The proposal includes an asphalt parking lot that can accommodate 112 RVs. The project includes a 533 square foot caretaker dwelling to be provided in a premanufactured home. Access is provided to the site by a 20-foot-wide private driveway of crushed misc. base
LU10-0100	Minor Modification	North Ventura Avenue	Minor Modification to Conditional Use Permit 4926 (CUP 4926) to extend the CUP an additional 10 years. CUP 4926 is a wireless communication facility with a 120-foot-tall monopole with four-panel antennas in two sectors with two additional whip antennas.
LU11-0048	Minor Modification	North Ventura Avenue	Minor Modification to Conditional Use Permit 5163 to process a 10-year time extension for ongoing operation of a dog kennel located in the AE Zone addressed as 4692 N. Ventura Avenue.
LU11-0093	Planned Development	North Ventura Avenue	Major Modification to a PD1867 to establish an entitlement for each of the industrial properties that were originally approved under a single entitlement and subsequently subdivided via Parcel Map 5792. 100 Shell Road (APN 063-0-220-14) is proposed to entitle a fruit warehouse, packing, and distributing company within an existing 25,187.5-square-foot building that was approved for concrete form cast manufacturing.

Permit Number	Permit Type/Status	Location	Description
LU11-0103	Planned Development/Pending	North Ventura Avenue	The applicant requests that the DP 99-6 permit be modified to include the 2.74-acre property (i.e., the southerly portion of APN 063-0-220-110) upon which the current Aera Energy operations are conducted in a separate permit. Other than this modification of the permit boundary, no changes in the authorized uses or structures are proposed in this 2.74-acre area. The existing permit requirements and conditions of approval will remain applicable in this permit area.
LU11-0091	Major Modification	North Ventura Avenue	Major Modification to a PD1867 to establish an entitlement for each of the industrial properties that were originally approved under a single entitlement and subsequently subdivided via Parcel Map 5792. 100 Shell Road (APN 063-0-220-14) is proposed to entitle a fruit warehouse, packing, and distributing company within an existing 25,187.5-square-foot building that was approved for concrete form cast manufacturing.
LU07-0047	Minor Modification/Pending	North Ventura Avenue	As of November, 2010, the applicant proposes to (1) legalize the operation of oilfield related contractor service and storage yards for two contractors (MJ Tank lines, KAG Tank lines); (2) legalize an existing 1,200-square-foot structure (Phase II warehouse) constructed without building permit on APN 068-0-040-13 which was originally shown on DP99-6 as located on another APN and proposed for 3,000 sf.; (3) modify and update the site plan to revise the permit boundaries down to 32.45 acres and lot coverage to be 25,581 square feet of total roof area of buildings; (4) modify and update the site plan to indicate relocation and size reduction of proposed phase 1 warehouse (4,800 square feet), relocation of the existing dispatcher office to APN 068-0-040-13, relocation of the existing diesel fuel tank facility to 068-0-010-01; (5) relinquish PD 1992; (6) modify and update the site plan to remove the auto impound yard property (APN 068-0-040-120 and 050), bike path (APN 068-0-020-01), Towing yard (APN 068-0-040-08); and the truck wash area property (APN 068-0-040-02 portion) from the DP 99-7 boundary; (7) Removal of the previously approved under DP 99-6 Main office addition and Warehouse Phase I both not yet built; and (8) add fire hydrants, waterline for fire and detention basin.
SD10-0034	Lot Line Adjustment/Pending	North Ventura Avenue	Approval of a ministerial Lot Line Adjustment No. SD10-0034 to transfer 0.07 acres from a 2.06-acre parcel (APN 060-0-270-220) zoned Rural Exclusive 2 acre minimum to a 0.86-acre parcel (APN 060-0-220-195) zoned Rural Exclusive 1 acre minimum.
SD10-0035	Merger/Pending	North Ventura Avenue	Approval of the ministerial Lot Line Adjustment No. SD10-0034 to transfer 0.07 acres from a 2.06-acre parcel (APN 060-0-270-220) zoned Rural Exclusive 2 acre minimum to a 0.86-acre parcel (APN 060-0-220-195) zoned Rural Exclusive 1 acre minimum.
SD11-0021	Conservation Subdivision/Pending	North Ventura Avenue	The applicant is proposing a Parcel Map Waiver-Conservation Subdivision of an 85.7-acre parcel (Parcel "B" of SD11-0001 PMW LLA recorded June 8, 2011) into 2 parcels, Parcel "1" 65.1 acres, zoned OS 40, as a conservation parcel for the restoration and preservation of river habitat by the Ojai Valley Land Conservancy and Parcel 2 a 20.6-acre parcel zoned OS 40 also owned by Ojai Valley Land Conservancy and to be transferred to private ownership in the future. Parcel 1 will be conforming for the minimum lot size and Parcel 2 will be non-conforming as allowed by ordinance. Each proposed parcel has an existing SFR. No new development is proposed at this time for either parcel.
SD12-0002	Parcel Map	Ojai Valley Area	A subdivision (TPM) to create 4 parcels. TPM 5878, 2 in the OS 40 and 2 in the R1-20,000-square-foot zoning designation.

Permit Number	Permit Type/Status	Location	Description
SD05-0041	Conditional Certificate of Compliance/ Pending	Oak View	CCC for lot legalization, PM 5616. Date of conditions is November 4, 1997.
LU11-0052	Conditional Use Permit/Pending	Ojai Valley Area	Discretionary Parcel Map Waiver/Voluntary Merger (PMW/VM) to merge two illegal lots to create one 14,374-square-foot parcel. SFR on parcel.
SD12-0003	Merger/Pending	Ojai Valley Area	Radio Communication Facility located on a 40-acre property with an Open Space General Plan land use designation and an Open Space Min. 160-acre Zone Designation approximately. The proposed facility consists of a 105-foot tall triangular lattice tower with four FM Radio antenna arrays.
SD10-0010	Lot Line 04/11/2012 Adjustment/Approved	Ojai Area	Four lot line adjustments, resulting lots meet 1-acre lot minimum, qualifies for ministerial processing.

C.1 Air Quality

C.1A Air Quality Standards

Ambient air quality is determined by comparing contaminant levels in ambient air samples to national and state standards. These standards are set by the United States Environmental Protection Agency (USEPA) and the California Air Resources Board (CARB) at levels determined to be protective of public health and welfare with an adequate margin of safety. National Ambient Air Quality Standards (NAAQS) were first established by the federal Clean Air Act of 1970. California Ambient Air Quality Standards (CAAQS) were established in 1967. An area with air quality continuously below or equal to these standards is designated as being in attainment. California standards are generally more stringent than national standards.

Air quality standards specify the upper limits of concentrations and duration in the ambient air consistent with the management goal of preventing specific harmful effects. There are federal and state standards for ozone, carbon monoxide (CO), nitrogen dioxide (NO₂), airborne particulate matter with an aerodynamic diameter of less than 10 and 2.5 microns (PM₁₀ and PM_{2.5}, respectively), and sulfur dioxide (SO₂). These are considered “criteria pollutants.” The federal and state Ambient Air Quality Standards for these pollutants are shown in **Table 3**.

Table 3
National and California Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards*	National Standards*
Ozone	1 hour	0.09 ppm	--
	8 hours	0.07 ppm	0.075 ppm
Respirable Particulate Matter (PM10)	24 hours	50 µg/m ³	150 µg/m ³
	Annual Mean	20 µg/m ³	—
Fine Particulate Matter (PM2.5)	24 hours	—	35 µg/m ³
	Annual Mean	12 µg/m ³	15 µg/m ³
Carbon Monoxide (CO)	1 hour	20 ppm	35 ppm
	8 hours	9.0 ppm	9.0 ppm
Nitrogen Dioxide (NO ₂)	1 hour	0.18 ppm	0.100 ppm
	Annual Mean	0.03 ppm	0.053 ppm
Sulfur Dioxide (SO ₂)	1 hour	0.25 ppm	0.075 ppm
	24 hours	0.04 ppm	0.14 ppm
	Annual Mean	—	0.03 ppm

* ppm = parts per million; µg/m³ = micrograms per cubic meter; "—" = no standard.
Source: CARB

C.1B Attainment Status

Ventura County is designated by the USEPA and CARB as a nonattainment area for ozone; it is also designated as nonattainment by CARB for PM10 and PM2.5. **Table 4** provides the attainment status for all criteria pollutants in Ventura County.

Table 4
Attainment Status for Ventura County

Pollutant	Federal Designation	State Designation
Ozone – 1 hour	N/A	Severe Nonattainment
Ozone – 8 hour	Serious Nonattainment	
PM10	Attainment	Nonattainment
PM2.5	Attainment	Nonattainment
CO	Unclassified/Attainment	Attainment
NO ₂	Unclassified/Attainment	Attainment
SO ₂	Attainment	Attainment

Source: CARB, USEPA

C.1C Air Quality Plans, Policies, and Regulations

The Ventura County Air Pollution Control District (APCD) implements, and periodically updates, the Ventura County *Air Quality Management Plan* (AQMP). The AQMP uses projections of population growth and trends in energy and transportation demand to predict future emissions and determine control strategies to eventually achieve attainment with the ambient air quality standards. The control strategies are then either codified into the Ventura County APCD's rules and regulations, or otherwise set forth as formal Ventura County APCD recommendations to other agencies.

The Ventura County *General Plan* includes policies that require consistency with the AQMP, and specifies review according to the recommendations contained in the Ventura County APCD's *Air Quality Assessment Guidelines*. Other policies are aimed at reducing emissions from transportation demand and major stationary sources. This air quality analysis has been prepared in accordance with the recommendations of the Ventura County APCD's *Air Quality Assessment Guidelines*; consequently, its consistency with the air quality policies of the Ventura County *General Plan* is assured.

The Ventura County APCD's rules and regulations include requirements for equipment and for fugitive dust control. These regulations contain both requirements and exemptions for certain types of equipment that may be used during implementation of the proposed project. Equipment with small internal combustion engines (under 50 horsepower) would be exempt from permitting through Ventura County APCD Rule 23-D. Similarly, dust emissions from mobile equipment that may occur would be exempt under Ventura County APCD Rule 23-B. Ventura County APCD Rule 74-9 contains limitations for larger, stationary internal combustion engines (greater than 50 horsepower) if they are operated for more than one year. However, within the context of the proposed project, use of these types of engines are not expected to occur; thus, these Ventura County APCD limitations would not be applicable. Nuisances from either dust or emissions of other contaminants are distinctly prohibited by Ventura County APCD's Rule 51, and fugitive dust control requirements are specified in Rules 55 and 55.1.

In addition, Section 176(c) of the Clean Air Act requires the US Environmental Protection Agency to develop criteria and procedures for determining the conformity of transportation and non-transportation (general) projects that require federal agency approval or funding with the applicable air quality plan. The proposed project may be subject to the requirements of the federal General Conformity regulation.

Significance Criteria. The Ventura County Air Pollution Control Board adopted the Ventura County APCD's Air Quality Assessment Guidelines with technical revisions in 2003. Using these Guidelines and the *State CEQA Guidelines*, an air quality impact would be significant if it would:

- Conflict with or obstruct implementation of the Ventura County AQMP;

- Violate any air quality standard or contribute to an existing or projected air quality violation;
- Result in a cumulatively considerable net increase of any criteria nonattainment pollutant;
- Expose the public (especially schools, day care centers, hospitals, retirement homes, convalescent facilities, and residences) to substantial pollutant concentrations;
- Create objectionable odors affecting a substantial number of people; or,
- Create a significant San Joaquin Valley Fever impact.

In addition to the above, within the County a net increase of ozone precursors (a nonattainment pollutant) of 25 pounds per day of reactive organic compounds or gases (ROCs or ROGs) or oxides of nitrogen (NO_x) is considered substantial. However, this Ventura County APCD significance threshold is specifically defined not to be applicable to construction emissions since such emissions are temporary in nature. However, the implementation of additional emission mitigation measures, as noted in Section 7.4.3 of the VCAPCD's *Air Quality Assessment Guidelines*, are recommended if construction emission do exceed this threshold.

Coccidioidomycosis, often referred to as San Joaquin Valley Fever or Valley Fever, is one of the most studied and oldest known fungal infections. Valley Fever most commonly affects people who live in hot dry areas with alkaline soil and varies with the season. This disease, which affects both humans and animals, is caused by inhalation of *arthroconidia* (spores) of the fungus *Coccidioides immitis* (CI). CI spores are found in the top few inches of soil and the existence of the fungus in most soil areas is temporary. The cocci fungus lives as a saprophyte (an organism, especially a fungus or bacterium, which grows on and derives its nourishment from dead or decaying organic matter) in dry, alkaline soil. When weather and moisture conditions are favorable, the fungus "blooms" and forms many tiny spores that lie dormant in the soil until they are stirred up by wind, vehicles, excavation, or other ground-disturbing activities and become airborne. Agricultural workers, construction workers, and other people who work outdoors and who are exposed to wind and dust are more likely to contract Valley Fever. Children and adults whose hobbies or sports activities expose them to wind and dust are also more likely to contract Valley Fever.

C.1D Regional

Air emissions are generated by a variety of sources in Ventura County. Motor vehicles traveling along local roadways are a major source. Agricultural activities such as diesel- and gasoline-powered equipment (e.g., tractors, trucks) and pesticide spraying also emit air pollutants. Finally, residential land uses in the region also emit air pollutants in the form of household products and cleaners.

The topography and climate of Ventura County combine to make it an area of significant smog potential. Temperature inversions occur frequently at approximately 800 to 1,000 feet above mean sea level and are most persistent during late summer and early fall. Temperature inversions occur when a warm air mass descends over a lower, cooler, moist marine air layer. The warm upper layer forms a cap over the marine layer and inhibits the air pollutants generated near the ground from dispersing upward. Light summer winds and the surrounding mountains further limit the horizontal dispersal of pollutants. Concentrating volumes of pollutants in this manner allows the summer sunlight to generate high levels of photochemical smog. In the winter, cool ground temperatures and very light winds can cause extremely low inversions and air stagnation, trapping pollutants during the late night and early morning hours.

The determination of whether a region’s air quality is healthful or unhealthful is made by comparing contaminant levels in ambient air samples to national and state standards. California and the US EPA have established health-based air quality standards for the following criteria air pollutants: ozone (O₃), carbon monoxide (CO), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), respirable particulate matter (PM₁₀), fine particulate matter (PM_{2.5}), and lead (Pb). These standards were established to protect sensitive receptors with a margin of safety from adverse health impacts due to exposure to air pollution. The California standards are more stringent than the federal standards, and in the case of PM₁₀ and SO₂, much more stringent. California has also established standards for sulfates, visibility-reducing particles, hydrogen sulfide, and vinyl chloride. The state and national ambient air quality standards for each of the monitored pollutants and their effects on health are summarized in **Table 5, Ambient Air Quality Standards**.

**Table 5
Ambient Air Quality Standards**

Air Pollutant	Concentration/Averaging Time		Most Relevant Health Effects
	State Standard (CAAQS)	Federal Primary Standard (NAAQS)	
Ozone	0.09 ppm, 1-hr avg. 0.070 ppm, 8-hr avg.	0.075 ppm, 8-hr avg. (three-year average of annual fourth-highest daily maximum)	(a) Pulmonary function decrements and localized lung edema in humans and animals; (b) Risk to public health implied by alterations in pulmonary morphology and host defense in animals; (c) Increased mortality risk; (d) Risk to public health implied by altered connective tissue metabolism and altered pulmonary morphology in animals after long-term exposures and pulmonary function decrements in chronically exposed humans; (e) Vegetation damage; and (f) Property damage

Air Pollutant	Concentration/Averaging Time		Most Relevant Health Effects
	State Standard (CAAQS)	Federal Primary Standard (NAAQS)	
Nitrogen Dioxide ¹	0.18 ppm, 1-hr avg. 0.030 ppm, annual arithmetic mean	0.100 ppm, 1-hr avg. (three-year avg. of the 98 th percentile of the daily maximum 1-hour avg.) 0.053 ppm, annual arithmetic mean	(a) Potential to aggravate chronic respiratory disease and respiratory symptoms in sensitive groups; (b) Risk to public health implied by pulmonary and extrapulmonary biochemical and cellular changes and pulmonary structural changes; and (c) Contribution to atmospheric discoloration
Carbon Monoxide	20 ppm, 1-hr avg. 9.0 ppm, 8-hr avg.	35 ppm, 1-hr avg. (not to be exceeded more than once per year) 9 ppm, 8-hr avg. (not to be exceeded more than once per year)	(a) Aggravation of angina pectoris and other aspects of coronary heart disease; (b) Decreased exercise tolerance in persons with peripheral vascular disease and lung disease; (c) Impairment of central nervous system functions; and (d) Possible increased risk to fetuses
Sulfur Dioxide ²	0.25 ppm, 1-hr. avg. 0.04 ppm, 24-hr avg.	0.075 ppm, 1-hr avg. (three-year avg. of the 99 th percentile)	Bronchoconstriction accompanied by symptoms that may include wheezing, shortness of breath and chest tightness during exercise or physical activity in person with asthma
Respirable Particulate Matter (PM10)	50 µg/m ³ , 24-hr avg. 20 µg/m ³ , annual arithmetic mean	150 µg/m ³ , 24-hr avg. (not to be exceeded more than once per year on average over three years)	(a) Exacerbation of symptoms in sensitive patients with respiratory or cardiovascular disease; (b) Declines in pulmonary function growth in children; and (c) Increased risk of premature death from heart or lung diseases in the elderly
Fine Particulate Matter (PM2.5)	12 µg/m ³ , annual arithmetic mean	35 µg/m ³ , 24-hr avg. (three-year average of 98 th percentile) 15 µg/m ³ , annual arithmetic mean (three-year average)	(a) Exacerbation of symptoms in sensitive patients with respiratory or cardiovascular disease; (b) Declines in pulmonary function growth in children; and (c) Increased risk of premature death from heart or lung diseases in the elderly
Lead ³	1.5 µg/m ³ , 30-day avg.	1.5 µg/m ³ , calendar quarter 0.15 µg/m ³ , three-month rolling average	(a) Increased body burden, and (b) Impairment of blood formation and nerve conduction
Visibility-Reducing Particles	Reduction of visual range to less than 10 miles at relative humidity less than 70%, 8-hour avg. (10:00 AM–6:00 PM)	None	Visibility impairment on days when relative humidity is less than 70 percent.
Sulfates	25 µg/m ³ , 24-hr avg.	None	(a) Decrease in ventilatory function, (b) Aggravation of asthmatic symptoms, (c) Aggravation of cardiopulmonary disease, (d) Vegetation damage, (e) Degradation of visibility, and (f) Property damage

Air Pollutant	Concentration/Averaging Time		Most Relevant Health Effects
	State Standard (CAAQS)	Federal Primary Standard (NAAQS)	
Hydrogen Sulfide	0.03 ppm, 1-hr avg.	None	Odor annoyance
Vinyl Chloride ³	0.01 ppm, 24-hr avg.	None	Known carcinogen

Source: South Coast Air Quality Management District, Final Program Environmental Impact Report for the 2007 Air Quality Management Plan, 2007. Table 3.1-1, p. 3.1-3.

$\mu\text{g}/\text{m}^3$ = microgram per cubic meter; ppm = parts per million by volume; hr = hour.

¹ On January 25, 2010, the US EPA promulgated a new 1-hour NO_2 standard. The new 1-hour standard is 0.100 parts per million (188 micrograms per cubic meter [$\mu\text{g}/\text{m}^3$]) and became effective on April 12, 2010.

² On June 3, 2010, the US EPA issued a new 1-hour SO_2 standard. The new 1-hour standard is 0.075 parts per million (196 $\mu\text{g}/\text{m}^3$). The US EPA also revoked the existing 24-hour and annual standards citing a lack of evidence of specific health impacts from long-term exposures. The new 1-hour standard becomes effective 60 days after publication in the Federal Register.

³ CARB has identified lead and vinyl chloride as “toxic air contaminants” with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.

Generally, the sources for hydrogen sulfide emissions include decomposition of human and animal wastes and industrial activities, such as food processing, coke ovens, kraft paper mills, tanneries, and petroleum refineries. There are no such uses or sources associated with the proposed project. Similarly, the sources for vinyl chloride emissions include manufacturing of plastic products, hazardous waste sites, and landfills; and there are no such uses or sources associated with the proposed project. As a result, there is no need for any further evaluation of the hydrogen sulfide or vinyl chloride emissions associated with this project. Motor vehicles and paints used to be a source of lead; however, unleaded fuel and unleaded paints have virtually eliminated lead emissions from residential and commercial land use projects. As a result, there is no need for any further evaluation of lead emissions with respect to the proposed project.

C.1E Local

The project site is in close proximity to single-family residential units. Construction of the proposed project would generate construction related emissions which may exceed the Ojai Planning Area thresholds for ozone precursors: reactive organic compounds (ROC) and nitrogen oxides (NO_x). The emission threshold for ROC is 5 pounds per day (lbs/d) and the threshold for NO_x is 5 lbs/d. In addition, the proposed project may exceed criteria pollutants ambient air quality standards during construction of the flood mitigation structure. An exceedance of 2 lbs/d of ROC or NO_x which is found to be inconsistent with the air quality management plan (AQMP) may cause a significant cumulative impact. During the construction process the project would generate fugitive dust emissions. Impacts may potentially be significant.

The proposed project is not a growth inducing or population generating project. Therefore the proposed project would be consistent with the AQMP. Impacts to the consistency of the AQMP would be less than significant.

In order to calculate the estimated amount of construction emissions and to determine significance, the Draft EIR will analyze construction emissions using the appropriate air quality model.

Ojai Valley Area Plan Policy 1.1.2-1 states, “Discretionary development in the Ojai Valley shall be found to have a significant adverse impact on the regional air quality if daily emissions would be greater than 5 pounds per day of nitrogen oxides.” The proposed project would be analyzed for consistency with the Ojai Valley Area Plan and the policies of the countywide area plan (policies 1.2.2-1 through 3 and 5). Thus, the proposed project may have significant impacts to air quality and this issue area will be analyzed further in the Draft EIR.

C.2 Water Resources

A project may affect surface water or groundwater either by directly extracting water or by creating substantial new demand for water. A project may also affect water resources by discharging contaminants, including chemicals and debris, into groundwater or surface water. As discussed below, the Ventura County *Initial Study Assessment Guidelines* provide standards for assessing a project’s potential impact to surface water and groundwater quantity and quality

C.2A Groundwater Quantity

Significance Criteria: According to the Ventura County *Initial Study Assessment Guidelines*, any project that meets one of the criteria listed below could result in a significant impact to groundwater quantity.¹

- Directly or indirectly decrease, either individually or cumulatively, the net quantity of groundwater in a groundwater basin that is overdrafted or creates overdraft conditions.
- In groundwater basins that are not overdrafted, or are not in hydrologic continuity with an overdrafted basin, net groundwater extraction that will individually or cumulatively cause overdrafted conditions.
- Any net increase in groundwater extraction from a groundwater basin and/or hydrologic unit which is not well known or documented but where there is evidence of overdraft based upon declining water levels in a well or wells.

1 County of Ventura, *Initial Study Assessment Guidelines*, 2011.

Regardless of the criteria above, any land use or project which would result in 1 acre-foot or less of net annual increase in groundwater extraction is not considered to have a significant or cumulative impact on groundwater quantity.² In addition, any project that is inconsistent with any of the policies or development standards relating to groundwater quantity of the Ventura County *General Plan Goals, Policies and Programs* or applicable Area Plan, may result in a significant environmental impact.

Proposed Project Impacts: The proposed project is a public infrastructure project that would increase the flow capacity of the flood control channel to transfer a 100-year bulk flow. The proposed project would not require substantial groundwater extraction during construction or operation. Some minimal dewatering may occur as necessary during project construction, but the quantity would not be considered substantial. According to the Ventura County *Initial Study Assessment Guidelines*, any land use or project which would result in a net annual extraction of 1.0 acre-foot per year or less is not considered to have a significant project or cumulative impact on groundwater quantity. Therefore the proposed project would have no impact on the quantity of groundwater. This issue area will not be discussed further in the Draft EIR.

Cumulative Impacts: As discussed above, the proposed project would not affect groundwater quantity, and thus would not incrementally contribute to cumulatively significant impacts. No cumulative impacts would occur.

C.2B *Groundwater Quality*

Significance Criteria: According to the Ventura County *Initial Study Assessment Guidelines*, any project that meets one of the criteria listed below could result in a significant impact to groundwater quality.³

- Individually or cumulatively degrade the quality of groundwater and cause groundwater to exceed groundwater quality objectives set by the [Los Angeles Regional Water Quality Control Board (RWQCB)] Basin Plan.
- Cause the quality of groundwater to fail to meet the groundwater quality objectives set by the Los Angeles RWQCB.
- Propose the use of groundwater in any capacity within 2 miles of the boundary of a former or current test site for rocket engines.

Proposed Project Impacts: The proposed project is located in the Upper Ventura River reach identified in the Los Angeles Regional Water Quality Control Board (Los Angeles RWQCB) Basin Plan. The

2 County of Ventura, Initial Study Assessment Guidelines, 2011.

3 County of Ventura, Initial Study Assessment Guidelines, 2011.

groundwater constituents of concern are total dissolved solids (TDS), sulfate, chloride, and boron. According to the VCWPD Annual Groundwater Report all RWQCB groundwater constituents of concern from the three wells sampled were determined to be below the objectives of the Basin Plan with the exception of TDS, with an average concentration of 714 milligrams per liter (mg/l).⁴ Groundwater contamination may occur through direct contact with groundwater resources or through infiltration of potentially hazardous materials to underlying groundwater. The potential for each of these situations to occur under the proposed project is discussed below.

The project site is located in the Upper Ventura River Groundwater Basin. The exact depth to groundwater at the project site is not known at this time. Measurements in the Upper Ventura River Groundwater Basin varies both depending on the location within the basin and depending on season. The VCWPD's *2011 Groundwater Section Annual Report* provides depth to groundwater for 18 wells in the Upper Ventura River Groundwater Basin ranging from less than 10 feet to more than 100 feet depending on the measurement location.⁵ The State Water Resource Control Board's Geotracker database does not indicate any monitoring sites nearby that could provide additional data for groundwater depth in the area.

Project construction would require substantial excavation of soils that would potentially result in the exposure of groundwater to hazardous materials common at construction sites (e.g., fuel, lubricants, and sealants). The implementation of best management practices (BMPs) identified in the storm water pollution prevention plan (SWPPP) would ensure that such contaminants would be stored away from water resources and that any water runoff would be directed away from both surface and groundwater resources. Potential impacts to groundwater quality would be less than significant.

The operation of the proposed project would not degrade the groundwater quality of the project area. Impacts would be less than significant.

Cumulative Impacts: As discussed above, the proposed project would not affect groundwater quality, and thus would not incrementally contribute to cumulatively significant impacts. No cumulative impacts would occur.

⁴ Ventura County Watershed Protection District, Water and Environmental Resource Division, *2011 Groundwater Section Annual Report*, 37.

⁵ VCWPD, *2011 Groundwater Section Annual Report*, 37.

C.2C *Surface Water Quantity*

Significance Criteria: According to the Ventura County *Initial Study Assessment Guidelines*, any project that meets one of the criteria listed below would result in a significant impact to surface water quantity.

- Increase surface water consumptive use, either individually or cumulatively, in a fully appropriated stream reach as designated by the State Water Resources Control Board (SWRCB), or where non-appropriated surface water is unavailable.
- Increase surface water consumptive use including but not limited to diversion or dewatering downstream reaches, either individually or cumulatively, resulting in an adverse impact to one or more of the beneficial uses listed in the Basin Plan.

Proposed Project Impacts: The proposed project would not increase demand for water use from the Ventura River. Therefore the proposed project would result in less than significant impacts on the surface water quantity. This issue will not be discussed in the Draft EIR.

Cumulative Impacts: As discussed above, the proposed project would not increase demand for water use from the Ventura River, and thus would not incrementally contribute to cumulatively significant impacts related to surface water quantity. No cumulative impacts would occur.

C.2D *Surface Water Quality*

Significance Criteria: According to the Ventura County *Initial Study Assessment Guidelines*, any project that meets one of the criteria listed below would result in a significant impact to surface water quality.

- Individually or cumulatively degrade the quality of surface water and cause it to exceed water quality objectives contained in Chapter 3 of the three Basin Plans.
- Directly or indirectly cause stormwater quality to exceed water quality objectives or standards in the applicable MS4 Permit or any other NPDES Permits.

Proposed Project Impacts: The State Water Resources Control Board (SWRCB) administers the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges associated with Construction and Land Disturbance Activities (Order No. 2009-0009-DWQ; as amended by Order No. 2010-0014-DWQ; NPDES General Permit No. CAS000002).⁶ Construction activities associated with small linear underground/overhead projects that result in land disturbances greater than 1 acre, but less than 5 acres (hereafter referred to as small LUPs [land use plans]), are not like traditional construction

⁶ California Environmental Protection Agency, State Water Resources Control Board, General Permit For Storm Water Discharges Associated with Construction and Land Disturbance Activities, Order No. 2010-0014-DWQ, NPDES No. CAS000002.

projects.⁷ Small LUPs have a lower potential to impact receiving waters because these projects are typically short duration and constructed within or around hard paved surfaces that result in minimal disturbed land areas being exposed at the close of the construction day. Therefore, this General Permit has been adopted statewide, and it is applicable to construction activities associated with small LUPs.

Tier II projects are all other small LUPs that do not meet the definition of Tier I projects. Tier II projects may have a higher potential to impact storm water quality, and they need to be regulated with a higher level of review and oversight. Like Tier I projects, Tier II projects are typically constructed over a short period of time. However, these projects have a higher potential to impact water quality because (1) typically they occur outside the more urban/developed areas, (2) they have larger areas of soil disturbance that are not closed or restored at the end of the day; (3) they may have on-site stockpiles of soil, spoil and other materials; (4) they cross or occur in close proximity to a wide variety of sensitive resources which may include, but are not limited to, steep topography and/or water bodies; and (5) they have larger areas of disturbed soils that may be exposed for a longer time interval before final stabilization, cleanup and/or reclamation occurs. Due to its location and design, the proposed project would be considered a Tier II project.

The General Permit requires the discharger or its authorized representative to develop and implement an SWPPP for these construction activities that are specific for project type, location, and characteristics. The SWPPP would provide BMPs that would ensure that potential contaminants used during construction (e.g., fuel, lubricants, sealants) would be stored away from areas where they could potentially affect water quality, and would provide measures for managing flows during accidental spills or storm events that would ensure that contaminants are conveyed away from the Ventura River. Implementation of the SWPPP requirements would ensure that impacts during construction would be less than significant.

In addition to the NPDES General Permit No. CAS000002 requirements discussed above, the Los Angeles regional Water Quality Control Board NPDES Municipal Stormwater Permit No. CAS004002 contains additional construction requirements for surface water quality and storm water runoff in Part 4.F.I.4., “*Development Construction Program.*” Because the project site is located within 200 feet of the Ventura River, Part 4.F.I.4 requires additional inspections to be conducted by the Qualified SWPPP Developer, Qualified SWPPP Practitioner, or Certified Professionals in Erosion and Sediment Control (CPESC). The Municipal Stormwater Permit No. CAS004002 requires completion of a Local SWPPP and Enhanced BMP Construction for High Risk Sites (SW-HR form – Best Management Practices for Construction at High

⁷ State Water Resources Control Board, Water Quality Order 2003-0007-DWQ, *NPDES General Permit for Storm Water Discharges associated with Construction Activity from Small Linear Underground/Overhead Projects.*

Risk Sites), which can be found at <http://onestoppermit.ventura.org/>. Inspectors are required to conduct Local SWPPP inspections during construction to ensure effective installation of the required SW-HR Enhanced BMPs and keep records of required inspections by the project Qualified SWPPP Developer, Qualified SWPPP Practitioner, or CPESC.

Alternative 1 may exceed the 10,000 square feet of new impervious surface for the construction of the box culvert, reinforced concrete channel and associated concrete transition structures. The post-construction requirements of the Los Angeles Regional Water Quality Control Board NPDES Municipal Stormwater Permit No. CAS004002 are applicable to projects that create 10,000 square feet of new impervious surface and increase the hydraulic capacity of drainage facilities. In accordance with Part 4.E., "Planning and Land Development Program" of Municipal Stormwater Permit No. CAS004002, the proposed project may be subject to the performance criteria defined in Section III of Part 4.E and the Ventura County Technical Guidance Manual for Stormwater Quality Control Measures, July 2011. The Technical Guidance Manual includes Alternative Compliance Options (Section 2.7) for flood control and wet utility projects, located within a water body, that do not increase effective imperviousness. The Draft EIR will include an analysis of the total new impervious area of the project alternatives, and the potential applicability of the requirements to provide a site-specific Post-Construction Stormwater Management Plan (PCSMMP).

Operation of the proposed project would redirect stormwater flows originating in Fresno Canyon away from the community of Casitas Springs and toward the Ventura River. These flows currently reach the Ventura River through existing stormwater conveyance facilities or as sheet flow during severe rain events that cause flooding in the community of Casitas Springs. Capturing these stormwater flows in the proposed project facilities would not degrade surface water quality in the Ventura River. Impacts related to surface water quality would be less than significant. This issue area will be discussed further in the Draft EIR.

Cumulative Impacts: It is reasonably assumed that other projects identified in the cumulative scenario above would include the use of some of the same types of equipment and vehicles as the proposed project, and would have the potential to result in similar impacts to surface water quality as the proposed project. However, as described above, potential surface water quality impacts of the proposed project would be localized and of short duration. Potential cumulative impacts to surface water quality would be less than significant.

C.3 Mineral Resources

The assessment of mineral resources presents an analysis of the impacts associated with aggregate and petroleum resources. Aggregate resources include construction grade sand, rock, and gravel; and petroleum resources include oil and gas deposits. Impacts associated with these mineral resources involves hampering or precluding extraction of, or access to, these mineral resources.

C.3A Aggregate

Significance Criteria: According to the Ventura County *Initial Study Assessment Guidelines*, a project would have a significant impact on aggregate resources if it is proposed to be located on or immediately adjacent to land zoned Mineral Resource Protection (MRP) overlay zone, or adjacent to a principal access road to an existing aggregate Conditional Use Permit (CUP), and has the potential to hamper or preclude extraction of or access to the aggregate resources.

Proposed Project Impacts: The project site is located adjacent and connects to an area designated as MRZ-3a which indicates areas judged to have higher potential than other deposits classified MRZ-3.⁸ Areas classified as MRZ-3 are areas containing mineral deposits, the significance of which cannot be evaluated from available data. The MRP overlay zone is applied to appropriate MRZ-2. The project site is located approximately 3.5 miles north of an identified Conditional Use Permit (CUP) that would allow mining.⁹ As the project site is not located adjacent to land classified as MRZ-2 nor is it permitted for aggregate extraction, the project would have no impact on the extraction of, or access to, aggregate resources. This issue will not be discussed in the Draft EIR.

Cumulative Impacts: As discussed above, the proposed project would not impact aggregate resources, and thus would not incrementally contribute to cumulatively significant impacts related to such resources. No cumulative impacts would occur.

C.3B Petroleum

Significance Criteria: According to the Ventura County *Initial Study Assessment Guidelines*, any land use that is proposed to be located on or immediately adjacent to any known petroleum resource area, or adjacent to a principal access road to an existing petroleum CUP, has the potential to hamper or preclude access to petroleum resources.

⁸ Ventura County General Plan, *Resources Appendix, Figure 1.4.1, Aggregate Resources*, 2008.

⁹ Ventura County General Plan, *Resources Appendix, Figure 1.4.6, Mineral Resources/Mining Permits Map*, 2008.

Proposed Project Impacts: The project site is not located over or adjacent to an identified petroleum resource area.¹⁰ The project site is not located along an access road to an oil extraction area. Therefore the project would not cause a significant impact on the extraction of oil resources. No impacts would occur.

The project's proposed flood conveyance pipeline alignment traverses beneath SR 33. This state highway may be used for truck traffic to petroleum CUP areas to the north of the project site. The proposed project consists of constructing a larger capacity flood control channel for the Fresno Canyon watershed. Therefore operation of the proposed project is not expected to affect truck traffic to and from oil areas north of the project site. Potential temporary access impacts due to project construction are addressed in the traffic section of this initial study. This issue area will not be discussed further in the Draft EIR.

Cumulative Impacts: As discussed above, the proposed project would not impact petroleum resources, and thus would not incrementally contribute to cumulatively significant impacts related to such resources. No cumulative impacts would occur.

C.4 Biological Resources

Significance Criteria: The Ventura County *Initial Study Assessment Guidelines* provide detailed thresholds for assessing a project's potential impacts to the following categories of biological resources: species, sensitive plant communities, waters and wetlands, and habitat connectivity. Additional thresholds are provided for environmentally sensitive habitat areas, but these apply only to projects within the coastal zone, and therefore are not considered in this section.

Species

- Loss of one or more individuals, occupied habitat or Critical Habitat designated by the US Fish and Wildlife Service of a species officially listed as Endangered, Threatened or Rare under the federal Endangered Species Act (Title 50, Code of Federal Regulations Sections 17.11 or 17.12) or California Endangered Species Act (Sections 670.2 or 670.5, Title 14, California Code of Regulations), a Candidate Species, or a California Fully Protected Species.
- Impacts that would eliminate or threaten to eliminate one or more element occurrences of a special-status species not otherwise listed under the federal Endangered Species Act or California Endangered Species Act, or as a Candidate Species or California Fully Protected Species.
- Impacts that would threaten the viability of a habitat that sustains a population of a special-status wildlife species.
- Impacts that would restrict the reproductive capacity of a special-status species.

¹⁰ VC General Plan, *Resources Appendix, Figure 1.4.7, Petroleum Resources Map*, 2008.

- Take of birds protected under the California Fish and Game Code (Sections 3503.5, 3511, and 3513) and the federal Migratory Bird Treaty Act (MBTA), as "take" is defined in the Fish and Game Code and MBTA.
- Increases in noise and/or nighttime lighting to a level above ambient levels that would adversely affect a special status species.
- Increases in human access, predation or competition from domestic animals, pests, or exotic species, or other indirect impacts, to levels that would adversely affect special status species.
- Impacts severe enough to substantially reduce the habitat of a wildlife species or cause a wildlife population to decline substantially or drop below self-sustaining levels, pursuant to Section 15065 of the *State CEQA Guidelines*, Mandatory Findings of Significance.

Sensitive Plant Communities

- Construction, grading, clearing, or other activities that would temporarily or permanently remove sensitive plant communities. Temporary impacts to sensitive plant communities would be considered significant unless the sensitive plant community is restored once the temporary impact is complete.
- Indirect impacts resulting from project operation at levels that would degrade the health of a sensitive plant community.

Waters and Wetlands

- Any of the following activities that would adversely affect waters and wetlands as defined in **Section B**, above:
 - removal of vegetation
 - grading
 - obstruction or diversion of water flow
 - change in velocity, siltation, volume of flow, or runoff rate
 - placement of fill
 - placement of structures
 - construction of a road crossing
 - placement of culverts or other underground piping
 - any disturbance of the substratum
- Disruptions to wetland or riparian plant communities that would isolate or substantially interrupt contiguous habitats, block seed dispersal routes, or increase vulnerability of wetland species to exotic weed invasion or local extirpation. An example would be disruption of adjacent upland vegetation to

a level that would adversely affect the ecological function of the wetland, such as where such vegetation plays a critical role in supporting riparian-dependent wildlife species (e.g., amphibians), or where such vegetation aids in stabilizing steep slopes adjacent to the riparian habitat, which reduces erosion and sedimentation potential.

- Interference with ongoing maintenance of hydrological conditions in a water or wetland. The hydrology of wetlands systems must be maintained if their function and values are to be preserved. Adverse hydrological changes might include altered freshwater input; changes in the watershed area or run-off quantity, quality, or velocity; drawing down of the groundwater table to the detriment of groundwater-dependent habitat; substantial increases in sedimentation; introduction of toxic elements or alteration of ambient water temperature.
- The project does not provide an adequate buffer for protecting the functions and values of existing waters or wetlands. The buffer is measured from the top-of-bank or edge of wetland or riparian habitat, whichever is greater. Ventura County General Plan Policy 1.5.2-4 requires a minimum buffer of 100 feet from significant wetland habitat. In accordance with this policy, buffer areas may be increased or decreased upon evaluation and recommendation by a qualified biologist and approval by the decision-making body. Factors to be used in determining adjustment of the 100-foot buffer include soil type, slope stability, and drainage patterns; presence or absence of Endangered, Threatened or Rare plants or animals; and compatibility of the proposed development with the wildlife use of the wetland habitat area.

Habitat Connectivity

- A habitat connectivity feature (e.g., a linkage, corridor, chokepoint, or stepping stone) would be severed, substantially interfered with, or potentially blocked.
- Wildlife access to foraging habitat, breeding habitat, water sources, or other areas necessary for their reproduction would be prevented or substantially interfered with.
- Wildlife would be forced to use routes that endanger their survival. For example, constraining a corridor for mule deer or mountain lion to an area that is not well vegetated or that runs along a road instead of through a stream corridor or along a ridgeline.
- Lighting, noise, domestic animals, or other indirect impacts that could hinder or discourage fish and/or wildlife movement within habitat connectivity feature (e.g., a linkage, corridor, chokepoint, or stepping stone) would be introduced.
- The width of linkage, corridor, or chokepoint would be reduced to less than the sufficient width for movement of the target species (the species relying upon the connectivity feature). The adequacy of the width shall be based on the biological information for the target species; the quality of the habitat within and adjacent to the linkage, corridor, or chokepoint; topography; and adjacent land uses.
- For wildlife relying on visual cues for movement, visual continuity (i.e., lines-of-sight) across highly constrained wildlife corridors, such as highway crossing structures or stepping stones, would not be maintained.

Proposed Project Impacts: The proposed project would involve construction within riparian areas along the eastern edge of the Ventura River. Habitat identified within this reach of the Ventura River has been designated as habitat for the federally listed Endangered Southern California steelhead (*Oncorhynchus mykiss*) Distinct Population Segment (DPS). The construction and the outflow design of the proposed project may have the potential to result in significant impacts to steelhead and steelhead habitat. The biological assessment prepared for the proposed project identified the presence of Southern California steelhead and designated critical habitat for Southern California steelhead within the project's area of effect.¹¹

Potential impacts to Endangered, Threatened or Rare species, including Southern California steelhead and other species identified as present or potentially present within the project area, and their critical habitat, wetland habitat, migration corridors, and locally important species (i.e., tree removal) will be discussed in detail in the Draft EIR. The Draft EIR will evaluate habitats on the project site for the potential to support least Bell's vireo, southwestern willow flycatcher, and California red-legged frog. If suitable habitats for these species are found to occur on the project site, the Draft EIR will include a mitigation measure that requires protocol surveys be conducted for each species.

Without appropriate mitigation, construction would also have the potential to significantly impact special-status plant and wildlife species within the project area. As such, impacts to special-status plant and animal species will be analyzed in the Draft EIR. The project area also traverses through oak woodland.¹² The Draft EIR will evaluate the potential impacts on oak woodlands, a locally important community, and any proposed mitigation measures for impacts on oak woodlands will comply with Section 21083.4(b) of the Public Resources Code.

Cumulative Impacts: The introduction to **Section C** provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. All of the past, present and reasonably foreseeable projects within Ventura County would also be required to comply with all applicable state and local laws and regulations regarding special-status plant and animal species. The potential for the proposed project to contribute to a significant cumulative impact will be analyzed in the Draft EIR.

¹¹ Impact Sciences, *Biological Assessment, Fresno Canyon Flood Mitigation Project*, (2012) 24–28.

¹² Ventura County General Plan, *Resources Appendix, Figure 1.5.1a, Vegetation*, 2008.

C.5 Agricultural Resources

C.5A Soils

Significance Criteria: According to the Ventura County *Initial Study Assessment Guidelines*, any project that would result in the direct and/or indirect loss of soils designated Prime, Statewide Importance, Unique or Local Importance would result in a significant impact.

Proposed Project Impacts: The project site is designated for “Other Land” and “Urban and Built-Up Land” according to the Farmland Mapping and Monitoring Program.¹³ The project site is not located on soils designated for Prime, Statewide, Unique or Local soils. Therefore there would be no impact to agricultural soils. This issue will not be discussed further in the Draft EIR.

Cumulative Impacts: Construction of the project would not result in the loss of the direct or indirect loss of Prime, Statewide, Unique, or Local soils, and therefore would not combine with related projects to cause a significant cumulative impact.

C.5B Land Use Incompatibility

Significance Criteria: According to the Ventura County *Initial Study Assessment Guidelines*, any project that is closer than the following distances will be considered to have a potentially significant environmental effect on agricultural resources: 300 feet, without vegetative screening, from a non-agricultural structure or use and common boundary line adjacent to classified farmland; or 150 feet, with vegetative screening, from a non-agricultural structure or use and common boundary line adjacent to classified farmland with vegetative screening.

Proposed Project Impacts: The project site is not located adjacent to, or within 300 feet of, land zoned for agriculture or agricultural operations. Thus there would be no impacts to land use compatibility with agricultural resources. This issue will not be discussed further in the Draft EIR.

Cumulative Impacts: Construction of the project would not result in land use incompatibility with agricultural resources, and therefore would not combine with related projects to cause a significant cumulative impact.

¹³ California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Ventura County *Important Farmland*, 2010.

C.6 Scenic Resources

Significance Criteria: According to the Ventura County *Initial Study Assessment Guidelines*, a project has the potential to create a significant impact to scenic resources if it:

- Is located within an area that has a scenic resource that is visible from a public viewing location; and,
- Would physically alter the scenic resource either individually or cumulatively when combined with recently approved, current, and reasonably foreseeable future projects; or
- Would substantially obstruct, degrade, or obscure the scenic vista, either individually or cumulatively when combined with recently approved, current, and reasonably foreseeable future projects.

In addition, a project would result in a potentially significant environmental impact if it is inconsistent with any of the applicable policies of the Ventura County *General Plan Goals, Policies, and Programs*.

Proposed Project Impacts: The project site bisects the Ojai Valley Trail, a public viewing location. As discussed in the Biological Resources discussion, the project is located within known oak woodland areas. Oak woodlands are considered a scenic resource according to the *Initial Study Assessment Guidelines*. In addition, the project is located adjacent to designated scenic resource protection overlay zone for prominent ridgelines and would construct within portions of the Ventura River.¹⁴ Construction of the proposed project would occur adjacent to, and underneath, the Ojai Valley Trail. Therefore there would be the potential for significant impacts to scenic resources from the Ojai Valley Trail. In addition, the SR 33 is an eligible State Scenic Highway.¹⁵ This issue area will be discussed in detail the Draft EIR.

Cumulative Impacts: Construction of the project and cumulative projects identified in the introduction to **Section C** could potentially impact scenic resources. The Draft EIR will analyze potential cumulative impacts to such resources to determine significance.

¹⁴ Ventura County General Plan, Ojai Valley Area Plan, (2008) Figure 2.

¹⁵ Ventura County General Plan, *Resources Appendix, Figure 1.7.3b, Designated and Eligible Scenic Highways (South Half)*, 2008.

C.7 Paleontological Resources

Significance Criteria: According to the Ventura County *Initial Study Assessment Guidelines*, the geologic formation in which proposed projects would be located can be used to establish the likelihood of paleontological resources being present and their relative importance. Fossil remains are considered important if they are:

- well preserved
- identifiable
- type/topotypic specimens
- age diagnostic
- useful in environmental reconstruction
- represent rare and/or endemic taxa
- represent a diverse assemblage
- represent associated marine and nonmarine taxa

Vertebrate and mega-invertebrate fossils are considered highly important because they are comparatively rare and allow precise age determinations and environmental reconstructions for the strata in which they occur; micro-invertebrate fossils (microfossils) are much more abundant and, for this reason and because of their small size, would not be adversely impacted to the same degree as vertebrate and mega-invertebrate fossils. Direct impacts to paleontological resources include grading and excavation of fossiliferous rock, which can result in the loss of scientifically important fossil specimens and associated geological data. Indirect impacts include increased access opportunities and unauthorized collection of fossil materials.

Proposed Project Impacts: The geologic formations that differentiate the project site are: Diablo clay (DbF), Mocho loam (MoA), and Riverwash (Rw). According to the *Initial Study Assessment Guidelines*, these soils are designated as Vaqueros Sandstone, Rincon Shale, and Holocene alluvial deposits for paleontological resources.¹⁶ The Vaqueros Sandstone has been identified as having a moderate to high potential for paleontological resources. Therefore potential impacts to paleontological resources are considered potentially significant and the Draft EIR will evaluate the potential impacts in detail.

¹⁶ County of Ventura, *Initial Study Assessment Guidelines*, 56.

Cumulative Impacts: Construction of the project and cumulative projects identified in the introduction to **Section C** could result in the discovery of unknown paleontological resources. The Draft EIR will analyze potential cumulative impacts to such resources to determine significance.

C.8 Cultural Resources

C.8A Archaeological

Significance Criteria: According to the Ventura County *Initial Study Assessment Guidelines*, and for the purposes of CEQA, a unique archaeological resource is an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

- Contains information needed to answer important scientific research question and that there is a demonstrable public interest in that information
- Has a special and particular quality such as oldest of its type or best available example of its type
- Is directly associated with a scientifically recognized important prehistoric or historic event or person
- Identified California "VEN" site: "Ven" means Ventura; A222 indicates the recorded archaeological investigation site number

The significance of an archaeological resource is materially impaired when a project: (1) demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of *historical resources* pursuant to Section 5020.1(k) requirements of Section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not archaeologically or culturally significant; or (2) demolishes or materially alters in an adverse manner those physical characteristics of an archaeological resource that convey its archaeological significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

Proposed Project Impacts: A records search at the Couth Central Coast Information Center indicated that there are no know cultural or archaeological resources sites in the project area. Some of the potentially significant archaeological and historic architectural resources that might be found within the project area include the San Buenaventura Mission aqueduct, possible Native American sites, Mexican Period resources, and sites or structures reflecting early residential, commercial, or institutional activities along the Ventura River. Construction of the proposed project could result in the discovery of unknown archeological resources. Therefore, the project has a potential to result in significant impacts to

archeological resources. The Draft EIR will analyze potential impacts to archeological resources to determine significance.

Cumulative Impacts: Construction of the project and cumulative projects identified in the introduction to **Section C** could result in the discovery of unknown archeological resources. The Draft EIR will analyze potential cumulative impacts to archeological resources to determine significance.

C.8B *Historical*

Significance Criteria: According to the Ventura County *Initial Study Assessment Guidelines*, a project with an effect that may cause a substantial adverse change in the “mandatory significance,” “presumptive significance,” or “discretionary significance” of a historical resource is a project that may have a significant effect on the environment. Substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historic resource would be materially impaired.

Proposed Project Impacts: In compliance with Section 160 (Title 16 United States Code Section 470f) of the National Historic Preservation Act (NHPA), as amended, and the First Amended Programmatic Agreement developed among FEMA, State Historic Preservation Officer (SHPO), California Emergency Management Agency (CalEMA), and the Advisory Council on Historic Preservation, FEMA conducted a review of the proposed project.¹⁷ In summary, FEMA has determined that the proposed project would result in “no historic properties affected.” Therefore, the proposed project would result in no impacts to historical resources. This issue area will not be discussed in the EIR.

Cumulative Impacts: The introduction to **Section C** provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. Although these identified cumulative projects could potentially impact historic resources individually (and thus potentially cumulatively), the proposed project would not affect historic resources. Consequently, it would not incrementally contribute to impacts related to historic resources in a manner that would be cumulatively considerable. No cumulative impacts would occur.

C.9 **Coastal Beaches and Sand Dunes**

Significance Criteria: According to the Ventura County *Initial Study Assessment Guidelines*, a proposed project would have a significant environmental impact if it causes a direct or indirect adverse physical change to a coastal beach or sand dune.

¹⁷ FEMA, *Cultural Resources Technical Report, Fresno Canyon Flood Mitigation*, 2009.

Proposed Project Impacts: The major sand dune communities in Ventura County include the McGrath-Mandalay area, at Ormond Beach, in the vicinity of Point Mugu, and near the mouths of the Santa Clara and Ventura Rivers. The nearest sand dune community or coastal beach to the project site is located approximately 6 miles to the south. The proposed project is not located near a major sand dune community and would therefore have no impact to coastal beaches and sand dunes. This issue area will not be discussed further in the Draft EIR.

Cumulative Impacts: The introduction to **Section C** provides a list of the reasonably foreseeable projects located in the proposed project area. The impacts associated with the proposed project would not impact coastal beaches or sand dunes; therefore, the proposed project would have no potential to combine with similar impacts of other past, present, or reasonably foreseeable projects. No cumulative impacts to coastal beaches and sand dunes would occur.

C.10 Fault Rupture

Significance Criteria: As described in the Ventura County *Initial Study Assessment Guidelines*, a project is potentially at risk with respect to fault rupture if it is located within: (1) a State of California designated Alquist-Priolo Special Fault Study Zone; (2) a County designated Fault Hazard Area.¹⁸ Impacts from primary fault rupture and ground displacement are generally related to damage or collapse of structures and subsequent injury to people.

Proposed Project Impacts: The nearest fault to the project site is the Red Mountain Fault located to the east. This fault is not designated as an Alquist-Priolo Fault Zone in the project area or as a County of Ventura designated Fault Hazard Area. The project site is located approximately 1 mile to the west of the Red Mountain Fault which has been designated as an active fault. As the project site is not located within 50 feet of an Alquist-Priolo Fault Zone or a County Fault Hazard Area, no impact would occur from fault rupture. This issue area will not be discussed further in the Draft EIR.

Cumulative Impacts: The introduction to **Section C** provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. As discussed above, the proposed project is not crossed by any known active or Alquist-Priolo zoned faults and therefore no impact from fault rupture would occur. As indicated in the Ventura County *Initial Study Assessment Guidelines* there is no known cumulative fault rupture impact that would occur as a result of other approved, proposed, or probable projects. No cumulative impacts would occur.

¹⁸ County of Ventura, *Initial Study Assessment Guidelines*, 2011.

C.11 Ground Shaking

Significance Criteria: As discussed in the Ventura County *Initial Study Assessment Guidelines*, ground shaking hazards are everywhere throughout Ventura County and are accommodated by the Ventura County Building Code. Ground shaking hazard areas are areas that can be expected to experience intense ground shaking during a maximum probable earthquake, with the shaking intensity depending primarily on the earthquake magnitude, distance and direction from the site, soil and bedrock conditions, and depth to groundwater. The potential for the highest amplification of ground shaking in Ventura County occurs in the Oxnard Plain and the Santa Clara River Valley in the southern half of the County, and in the Lockwood, Cuyama, and Cuddy Valleys in the northern half.¹⁹

According to the Ventura County *Initial Study Assessment Guidelines*, threshold criteria for determining whether a project is potentially susceptible to damage from seismically induced ground shaking are whether the proposed structure is designed to be built in accordance with all applicable requirements of the Ventura County Building Code, and if not then the project has the potential to expose people or other structures to potential significant adverse effects, including the risk of loss, injury or death involving ground shaking hazards; if the project will be built in accordance with all applicable requirements of the Ventura County Building Code then the project design will reduce the adverse effects of ground shaking to less than significant.

Proposed Project Impacts: According to the Ventura County General Plan, the Red Mountain, Ventura and Oak Ridge fault systems are located within approximately 10 miles of the site. These fault systems are identified as active and most probable to produce strong ground shaking at the site. As such there may be a potential impact to the structure of the proposed project during a seismic event from ground shaking. Therefore, the Draft EIR will analyze the potential impact to the project site from ground shaking during a seismic event.

Cumulative Impacts: The introduction to **Section C** provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. However, seismically induced ground shaking hazards and the potential effects of ground shaking related damage would affect each project individually so there would be no expected cumulative impacts. However, as discussed above, ground-shaking impacts associated with the proposed project would be potentially significant. Therefore, cumulative impacts will be further addressed in the EIR.

¹⁹ County of Ventura, *Initial Study Assessment Guidelines*, 2011.

C.12 Liquefaction

Significance Criteria: According to the Ventura County *Initial Study Assessment Guidelines*, the threshold criteria for determining whether a proposed project will expose people or structures to potential adverse effects, including the risk of loss, injury, or death involving liquefaction, is whether it is located within a Seismic Hazards Zone.

The State of California Seismic Hazard Zones Maps are to be utilized for all determinations for liquefaction potential. Projects located in mapped zones of required investigation for liquefaction must be evaluated for liquefaction potential in accordance with the requirements of the State of California Guidelines for Evaluating and Mitigating Seismic Hazards in California, Special Publication 117, dated 1997.

Proposed Project Impacts: Portions of the proposed project would be located within an identified liquefaction zone.²⁰ Consequently, there would be the potential for impacts to the project site as a result of liquefaction. A geologic/geotechnical report will have to be prepared to analyze liquefaction impacts to the proposed project. The Draft EIR will analyze the potential liquefaction impacts.

Cumulative Impacts: The introduction to **Section C** provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. However, liquefaction hazards and the potential effects of liquefaction-related damage would affect each project individually so there would be no expected cumulative impacts.

C.13 Seiche and Tsunami

Significance Criteria: According to the Ventura County *Initial Study Assessment Guidelines*, a project area would be subject to a potential seiche hazard if it is located within 10 to 20 feet vertical elevation from an enclosed body of water such as a bay, lake, or reservoir. The height of hazard above the water level is dependent on the ground motion intensity, duration of shaking, and subsurface topography of the lake or reservoir and surface topography of the shoreline. The *Initial Study Assessment Guidelines* indicate that the threshold of significance criteria for tsunami hazard is whether the proposed project is located in a mapped area of tsunami hazard as shown on the County General Plan maps. For most portions of the north and south coastal areas the tsunami hazard does not extend to areas more than 30 feet above sea level, and along the coastal plain the tsunami hazard extends inland for approximately 1 mile.

²⁰ Ventura County Resource Management Agency, GIS Development & Mapping Services, *Liquefaction Map*, 2010; State of California Department of Conservation, 2003.

Proposed Project Impacts: The project site is located approximately 5.5 miles north of the Pacific Ocean. In addition, the project site is not located within a designated tsunami zone.²¹ Therefore there would be no potential impact to the project site from a tsunami.

The proposed project consists of a bypass storm drain facility which would transport floodwater, sediments, and debris from the Fresno Canyon watershed to the Ventura River. There is no record of a seiche occurring in Ventura County and the threat posed by seiches in Ventura County is considered to be small.²² The project site is not located within 10 to 20 feet vertical elevation from an enclosed body of water such as a bay, lake, or reservoir; therefore, there would be no impact to the project area from a potential seiche hazard. This issue area will not be discussed further in the Draft EIR.

Cumulative Impacts: The introduction to **Section C** provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. As discussed above, the proposed project would not be located within a seiche or tsunami hazard area. As indicated in the Ventura County *Initial Study Assessment Guidelines*, hazards from seiche and tsunami will affect each project individually; and no cumulative seiche and tsunami hazard would occur as a result of other approved, proposed, or probable projects. No cumulative impacts would occur.

C.14 Landslides/Mudslides

Significance Criteria: The Ventura County *Initial Study Assessment Guidelines* distinguishes two landslide hazards that require assessment, landslide hazards from known landslides and earthquake induced landslide hazards. Landslide hazards from mapped or known landslides include landslides sourced on a variety of maps including the Dibblee Quadrangle Maps, Public Works Agency files, and the California Geographical Survey (CGS) Landslide Evaluation maps. Earthquake induced landslide hazards are areas mapped by the CGS as having the potential for landslides in the event of an earthquake and have been mapped on the State of California Seismic Hazard Maps.²³ According to the Ventura County *Initial Study Assessment Guidelines*, the threshold for landslide/mudslide hazard is determined by the Public Works Agency Certified Engineering Geologist based on the location of the site or project within, or outside of mapped landslides, potential earthquake induced landslide zones, and geomorphology of hillside terrain.

²¹ Ventura County Resource Management Agency, GIS Development & Mapping Services, *Tsunami Inundation Map*, 2011; California Emergency Management Agency, 2009.

²² Ventura County General Plan, *Hazards Appendix*, (2005) 30.

²³ County of Ventura, *Initial Study Assessment Guidelines*, 2011.

Proposed Project Impacts: The project site is located within, and adjacent to, areas that are prone to earthquake-induced landslides and within identified landslide and potential landslide areas.²⁴ Consequently, impacts from landslides and mudslides would be potentially significant. The Draft EIR will analyze the potential project and cumulative impacts in detail.

Cumulative Impacts: The introduction to **Section C** provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. The hazards from landslides/mudslides will affect each project individually; and no cumulative landslide/mudslide hazard is expected to occur as a result of other approved, proposed, or probable projects.

C.15 Expansive Soils

Significance Criteria: According to the Ventura County *Initial Study Assessment Guidelines*, the determination of a significant soils expansion effect shall be based upon an inquiry of whether a proposed project will expose people or structures to potential adverse effects, including the risk of loss, injury, or death involving soil expansion if it is located within a soils expansive hazard zone or where soils with an expansion index greater than 20 are present.²⁵

Proposed Project Impacts: The project site is located across identified medium and high expansive soils.²⁶ Therefore there would be the potential for significant impacts after the completion of the proposed project. This issue area will be analyzed further in the Draft EIR.

Cumulative Impacts: The introduction to **Section C** provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. As discussed above, the proposed project would be located within an area of expansive soils. As indicated in the Ventura County *Initial Study Assessment Guidelines*, the hazards from expansive soils will affect each project individually; and no cumulative expansive soils hazard is expected to occur as a result of other approved, proposed, or probable projects.

²⁴ Ventura County Resource Management Agency, GIS Development & Mapping Services, *Landslides Map*, 2010; State of California Department of Conservation, 2002.

²⁵ County of Ventura, *Initial Study Assessment Guidelines*, 2011.

²⁶ Ventura County Resource Management Agency, GIS Development & Mapping Services, *Expansive Soils Map*, 2010; United States Department of Agriculture, Soil Conservation Service, 1969.

C.16 Subsidence

Significance Criteria: As indicated in the Ventura County *Initial Study Assessment Guidelines*, the determination of a significant subsidence effect shall be based upon an inquiry of whether a proposed project will expose people or structures to potential adverse effects, including the risk of loss, injury, or death involving subsidence if it is located within a subsidence hazard zone.²⁷

Proposed Project Impacts: The project site is not located within a designated subsidence zone.²⁸ Therefore, there would be no impacts to the project site from subsidence. This issue area will not be discussed in the Draft EIR.

Cumulative Impacts: The introduction to **Section C** provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. As indicated in the Ventura County *Initial Study Assessment Guidelines* hazards from subsidence will affect each project individually; and no cumulative subsidence hazard would occur as a result of other approved, proposed, or probable projects. Consequently, no cumulative impacts would occur.

C.17 Hydraulic Hazards

C.17A Non-FEMA

In the context of flood control and drainage, non-FEMA hydraulic hazards consist of the wearing away (erosion) or deposition (sedimentation) of land surface by wind or water. Erosion occurs naturally from weather or runoff but can be intensified by land clearing practices. Flooding is an overflow of water onto land that is normally dry.

Significance Criteria: Erosion/siltation hazards and flooding hazards are ubiquitous throughout Ventura County and are addressed by the Ventura County Public Works Agency-Watershed Protection District's Standards and Specifications Design Manual. Erosion/siltation hazards and the effects of flooding hazards are required to be considered within the existing framework of grading and building code ordinances which apply to all sites and projects. Therefore threshold criteria are determined on a case-by-case basis pursuant to a variety of documents, including but not limited to the following: Ventura County ordinances and standards, Porter-Cologne Water Quality Control Act permit requirements, and NPDES permit requirements, which stipulate that project-specific BMPs are implemented to avoid or minimize erosion and sedimentation effects.

²⁷ County of Ventura, *Initial Study Assessment Guidelines*, 2011.

²⁸ County of Ventura, *General Plan Hazards Appendix*, 2011, 46.

Proposed Project Impacts: The construction and grading of the proposed project may reroute the drainage pattern of the project site temporarily. Therefore, there would be the potential for impacts during construction. In addition, the nature of the project is to convey flows during storm events from Fresno Canyon to the Ventura River. This may result in weathering of the flood control structure during operation of the project. Therefore, the potential impacts from flooding and erosion will be analyzed in the Draft EIR.

Cumulative Impacts: The introduction to **Section C** provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. Other projects in the cumulative scenario could introduce or increase potential hazards associated with erosion and sedimentation, particularly as a result of earth-disturbing activities during construction. Further evaluation of potential cumulative impacts will be provided in the EIR.

C.17B FEMA

Significance Criteria: According to the Ventura County *Initial Study Assessment Guidelines*, a proposed development that is located in part or in whole within the boundaries of a Special Flood Hazard Area, but outside of the boundaries of the Regulatory Floodway, would not result in significant impact under FEMA hydraulic hazards. A Special Flood Hazard Area is the area subject to a 1 percent chance of flooding in any given year, as defined on a Flood Insurance Rate Map (FIRM) as Zone A, and a Regulatory Floodway is the channel of a river or other watercourse and the adjacent land areas where floodwaters generally are the deepest, swiftest, and most hazardous, where floodwaters carry debris, potential projectiles and cause erosion, and where there is a high risk of loss of life and property damage.

As listed in the Ventura County *Initial Study Assessment Guidelines*, significance criteria for FEMA Hydraulic Hazards, as relevant to the proposed project, are provided below.

- A proposed development that is located, in part or in whole, within the boundaries of a Special Flood Hazard Area will result in a “Potentially Significant Project-Specific and Cumulative Impact – Mitigation Incorporated (PS-M)” under the issue area of Hydraulic Hazards – FEMA when potentially significant impacts from the 1 percent annual chance flood can be mitigated to a “Less Than Significant Project-Specific and Cumulative Impact (LS)” level through project design or measures such as but not limited to: relocating the proposed development elsewhere on the property where the risk of flood damage is potentially lower; implementing FEMA-supported building construction and grading technologies that mitigate flood damage and thereby reducing the risk of the flood hazard.
- A proposed development that is located, in part or in whole, within the boundaries of a Regulatory Floodway will result in a “Potentially Significant Project-Specific and Cumulative Impact (PS)” under the issue area of Hydraulic Hazards – FEMA. New habitable and non-habitable development will not

be allowed within the Regulatory Floodway, and development in these areas cannot be mitigated to a less than significant level.

Flooding hazards are ubiquitous throughout Ventura County and are accommodated by the Ventura County Building Code and Ventura County Public Works Watershed Protection District Standards and Specifications Design Manual; the effects of flooding hazards are required to be considered within the existing framework of grading and building code ordinances which apply to all sites and projects.

Proposed Project Impacts: The project site is located within a Federal Emergency Management Agency (FEMA) designated 100-year and 500-year floodplain.²⁹ The FEMA floodplain is shown in **Figure 4**. The purpose of the project is to reduce existing flood hazards in the community of Casitas Springs and across SR-33 by providing improved stormwater conveyance facilities that link Fresno Canyon to the Ventura River. The proposed project is considered a development project as defined in the *Initial Study Assessment Guidelines*. As the project is located within boundaries of a designated floodway, potentially significant and cumulative impacts may occur. For the portion of the project that traverses the 1 percent annual chance (100-year) Special Flood Hazard Area, as illustrated on the FEMA digital Flood Insurance Rate Map 06111C0731 of 1275, effective date January 20, 2010, and as shown in **Figure 4**, development should meet flood proofing and flood protection requirements as set out in the County of Ventura's Floodplain Management Ordinance 3841 and amendments thereto. This issue area will be analyzed further in the Draft EIR.

Cumulative Impacts: The introduction to **Section C** provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. Other projects in the cumulative scenario may result in flooding hazard impacts, and, as discussed above, project impacts are potentially significant. While the proposed project would ameliorate flooding hazards in the project area, additional consideration of potential cumulative flood hazard impacts will be provided in the EIR.

C.18 Fire Hazards

Significance Criteria: According to the Ventura County *Initial Study Assessment Guidelines*, projects located within High Fire Hazard Areas/Fire Hazard Severity Zones or Hazardous Watershed Fire Areas may have a significant fire hazard impact. The fire hazard impact can be mitigated by compliance with Building and Safety requirements for structures and the Fire Protection District Hazard Abatement program which calls for the clearing of brush, flammable vegetation, or combustible growth located

²⁹ Ventura County Resource Management Agency, GIS Development & Mapping Services, *FEMA Floodplains Map*, 2011; US Federal Emergency Management Agency, 2010.

within 100 feet of structures or buildings. Projects not located within High Fire Hazard Areas/Fire Hazard Severity Zones or Hazardous Watershed Fire Areas will not have a significant impact.³⁰

Proposed Project Impacts: The project site is located within a State Responsibility Area. The project site is designated as very high fire hazard severity zone from the west to high fire hazard severity zone to the eastern end of the project site.³¹ The project would comply with all applicable Federal, State regulations and the requirements of the Ventura County Building Code and the Fire Code. The project does not propose the construction of habitable structures and would therefore not result in the exposure of persons to potential fire hazard. Compliance with applicable County policies regarding brush clearance would ensure that impacts would be less than significant. This impact area will not be discussed further in the Draft EIR.

Cumulative Impacts: The introduction to **Section C** of this Initial Study provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. Cumulative projects would be required to comply with all applicable General Plan and Community Plan policies for the reduction of fire hazards. Cumulative impacts are anticipated to be less than significant.

C.19 Aviation Hazards

Significance Criteria: According to the Ventura County *Initial Study Assessment Guidelines*, a review of aviation hazards, as those hazards relate to proposed development of properties near county public airports, will focus on compliance with the County's Comprehensive Land Use Plan and pre-established federal criteria set forth in Federal Aviation Regulation Part 77 (Obstruction Standards), as well as those recommendations for good land-use planning made by state and county governments.³² As defined by the Ventura County *Initial Study Assessment Guidelines*, aviation hazards refer to the potential loss of life and/or property due to an aircraft accident, including any action which may cause an increase in the potential for an aircraft accident.³³

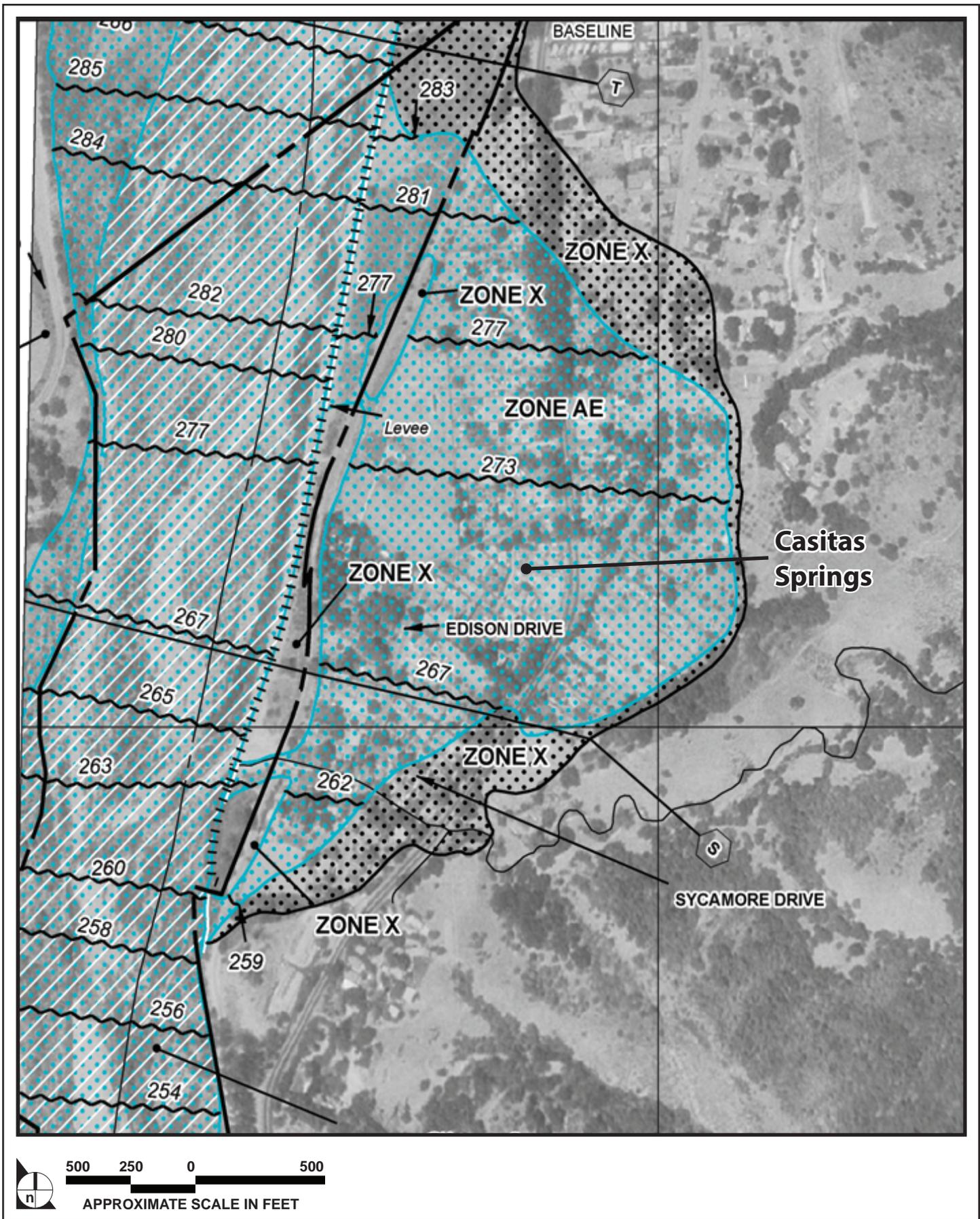
Proposed Project Impacts: The nearest airport is the Oxnard Airport located over 12.5 miles south of the project site. The project site would upgrade the existing drainage facility to transport the flows, sediment, and debris generated during a 100-year storm event within Fresno Canyon. Therefore, due to the distance from an airport and the nature of this public improvement project, no aviation hazard impacts would occur. This issue area will not be discussed in the Draft EIR.

³⁰ County of Ventura, *Initial Study Assessment Guidelines*, 2011.

³¹ California Department of Forestry and Fire Protection, *Fire Hazard Severity Zones in SRA: Ventura County*, 2007.

³² County of Ventura, *Initial Study Assessment Guidelines*, 2011.

³³ County of Ventura, *Initial Study Assessment Guidelines*, 2011.



SOURCE: Federal Emergency Management Agency, January, 2010

FIGURE 4

FEMA Flood Map

Cumulative Impacts: The proposed project would be cumulatively significant if it would contribute an incrementally adverse impact to the potential loss of life and/or property due to an aircraft accident, taking into consideration other cumulative projects in the area. However, as described above, the proposed project would result in no impacts associated with aviation hazards. Consequently, the proposed project would have no potential to combine with other projects identified in the introduction to **Section C**, resulting in a cumulative impact to aviation hazards. No cumulative impact to aviation hazards would occur.

C.20 Hazardous Materials/Waste

C.20A Hazardous Materials

Significance Criteria: According to the Ventura County *Initial Study Assessment Guidelines*, a project that is designed to meet all of the applicable requirements set forth in the following authorities shall not be considered to have a significant impact in this environmental area:

- **Underground Storage Tanks** - California Health and Safety Code, Division 20, Chapter 6.7 and the California Code of Regulations Title 23, Division 3, Chapter 16
- **Business Plan** - California Health and Safety Code, Division 20, Chapter 6.95, Article 1
- **Risk Management Plan** - California Health and Safety Code, Division 20, Chapter 6.95, Article 2
- **CUPA** - California Health and Safety Code, Division 20, Chapter 6.11
- **Fire Code** - The Fire Code adopted by the Ventura County Fire Protection District (VCFPD) in regards to aboveground hazardous materials. Reference California Health and Safety Code, Division 12, part 2.7

As addressed in Section 20a.E of the Ventura County *Initial Study Assessment Guidelines*, the methodology for determining hazardous material impacts of a project shall entail the following:

1. Determine if the proposed project will utilize hazardous materials in a quantity that is subject to regulation by the Environmental Health Division and/or VCFPD
2. Determine if the project will utilize and require the installation of underground hazardous materials storage tanks
3. Determine if existing underground storage tanks are on-site, and if they are in compliance with the testing and monitoring requirements set forth in the California Health and Safety Code, Division 20, Chapter 6.7 and the California Code of Regulations Title 23, Division 3, Chapter 16. Consult with the Ventura County Environmental Health Division Hazardous Materials Program and determine if any enforcement or compliance actions are pending. A site assessment must be completed on active Leaking Underground Fuel Tank (LUFT) sites before the application is deemed complete

4. Determine if existing tanks are to be permanently closed

Proposed Project Impacts: The proposed project would not utilize any hazardous materials, other than fuels used during project construction. The project would not utilize or require the installation of underground hazardous materials storage tanks. There are no underground storage tanks, cleanup sites, or hazardous waste sites located within the project area.³⁴ The proposed project would not involve the development, implementation, or use of a business plan or risk management plan. Therefore, there would be no hazardous material impact. This issue area will not be discussed further in the Draft EIR.

Cumulative Impacts: The introduction to **Section C** provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. All of the past, present and reasonably foreseeable projects within Ventura County are, or would be, subject to compliance with all applicable state, federal and local laws, regulations, and ordinances regarding hazardous materials. As discussed above, no impacts with hazardous materials associated with implementation of the proposed project are anticipated to occur. Therefore, the proposed project's incremental contribution to impacts associated with hazardous materials would not be cumulatively considerable.

C.20B Hazardous Waste

Significance Criteria: "Hazardous wastes" include the following:

- A waste, or combination of wastes, which because of quantity, concentration, physical or chemical characteristics, may cause, or significantly contribute to an increase in mortality or an increase in serious irreversible, or incapacitating reversible illness; or may pose a substantial present or potential hazard to human health or environment when improperly treated, stored, transported, or disposed of, or otherwise managed
- A waste that meets any of the criteria for the identification of a hazardous waste adopted by the State Department of Toxic Substances Control pursuant to Division 20, Chapter 6.5 of the California Health and Safety code

According to the Ventura County *Initial Study Assessment Guidelines*, the storage, handling, and disposal of potentially hazardous waste shall be in conformance with the requirements set forth in the following regulations:

- California Code of Regulations (CCR), Title 22, Division 4.5
- California Health and Safety Code, Division 20, Chapter 6.5

³⁴ California Department of Toxic Substances Control, *Envirostor Database*. <http://www.envirostor.dtsc.ca.gov/public/>.

- Ventura County Ordinance Code, Division 4, Chapter 5 (Hazardous Substances), Article 1, (Certified Unified Program Agency)

The above state legislation and local ordinances have been enacted for the purpose of preventing contamination from improper storage, handling and disposal of hazardous wastes. It is also the intent of these regulations to establish procedures so that the generators of hazardous wastes will be encouraged to employ reduction technology and destruction of their hazardous wastes prior to disposal.

Proposed Project Impacts: As discussed above, the proposed project would not handle, store, or use hazardous materials, other than fuels during project construction, or generate hazardous waste. The project site includes a 21-inch sewer line, operated by the Ojai Valley Sanitation District, which would need to be relocated during construction. The proposed project would not require or utilize a septic waste system. The project site is not located in a sensitive groundwater basin. As the proposed project would not produce hazardous wastes, no project level or cumulative impacts would occur.

Cumulative Impacts: The introduction to **Section C** provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. All of the past, present and reasonably foreseeable projects within Ventura County would also be required to comply with all applicable State and local laws and regulations regarding the disposal of hazardous waste, and may be required to implement additional safety measures for the handling and disposal of hazardous waste if warranted by project-specific regulatory reviews and approvals. It is assumed that all projects identified in **Table 2** would consult with the Ventura County Environmental Health Division to ensure that concerns related to hazardous waste are fully addressed. Therefore, the proposed project would not incrementally contribute to impacts associated with hazardous wastes that would be cumulatively considerable. No cumulative impacts would occur.

C.21 Noise and Vibration

Significance Criteria: Noise is defined as any unwanted sound that is undesirable because it interferes with speech and hearing, or is intense enough to damage hearing, or is otherwise is annoying.³⁵ Because the effects of noise accumulate over time, it is necessary to address both the intensity and duration of sound. As such, the thresholds of significance for noise take both of these elements into account.

Proposed Project Impacts: Construction would be located adjacent to sensitive land uses (i.e., single-family residences). The proposed project would involve short-term impacts on noise and vibration as a result of heavy equipment use for construction adjacent to residential areas during work hours. The

³⁵ County of Ventura, *Initial Study Assessment Guidelines*, 2011.

construction activities would be temporary and localized and any potentially significant construction impacts would be mitigated. In addition, periodic noise would be generated by ongoing maintenance activities during project operation. This issue area will be analyzed in detail in the Draft EIR.

Cumulative Impacts: The introduction to **Section C** provides a list of the reasonably foreseeable projects located in the proposed project area. Construction and operation of other projects in the cumulative scenario could reasonably include the use of equipment and installation of features which could create noise. Therefore, future development could result in cumulative noise impacts, which will require further discussion in the project EIR.

C.22 Daytime Glare

Significance Criteria: According to the Ventura County *Initial Study Assessment Guidelines*, a project will be considered to have a significant project-specific glare impact if the project would create a new source of disability glare or discomfort glare for motorists travelling along any road of the County Regional Road Network.

Proposed Project Impacts: The building materials that would be utilized under the proposed project for the flood conveyance features would not introduce any new source of glare. Thus, the proposed project would not create a new source of disability glare or discomfort glare for motorists travelling along SR 33. No project-specific glare impacts would occur. This issue area will not be discussed in the Draft EIR.

Cumulative Impacts: The introduction to **Section C** provides a list of the reasonably foreseeable projects located in the proposed project area. Construction and operation of other projects in the cumulative scenario could reasonably include the use of equipment and installation of features which could create glare. Therefore future development within the Ojai Valley area could result in cumulative glare impacts to motorists. However, as discussed above, there would be no glare impacts associated with the proposed project. Therefore, impacts associated with glare would not be cumulatively considerable.

C.23 Public Health

Significance Criteria: The issue of Public Health entails human health related issues such as, but not limited to, vectors, bioaerosols, and other pathogens or environmental factors that may pose a substantial present or potential hazard to public health.³⁶

³⁶ County of Ventura, *Initial Study Assessment Guidelines*, 2011.

According to the Ventura County *Initial Study Assessment Guidelines*, significance must be determined on a case-by-case basis and is related to project type, location and other environmental factors.³⁷

Proposed Project Impacts: The proposed project is not expected to adversely impact public health. The project site is not located within 2 miles of a former or current rocket engine testing facility and would not be subject to mandatory testing for perchlorate and trichloroethylene (TCE) in the soil. It is not anticipated that human health related issues such as vectors, bioaerosols, or other pathogens or environmental factors would result from construction or operation of the proposed project. Therefore, there would be no potential impact to public health. This issue area will not be discussed in the Draft EIR.

Cumulative Impacts: The introduction to **Section C** provides a list of the reasonably foreseeable projects located in the proposed project area. Although these projects may involve the use or transport of materials that could pose a threat to public health, or involve other activities which could place public health at risk, these projects would be required to mitigate for such impacts. Consequently, significant cumulative public health impacts within the proposed project area would not be anticipated to occur. As addressed above, there would be no public health impacts associated with implementation of the proposed project; therefore, its incremental contribution to public health impacts would not be cumulatively considerable. Less than significant cumulative impacts would occur.

C.24 Greenhouse Gases

Significance Criteria: Appendix G of the *State CEQA Guidelines* provides the following thresholds of significance for the analysis of greenhouse gas (GHG) impacts:

- Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment
- Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases

Proposed Project Impacts: The project would involve construction activities to upgrade the existing capacity of the Fresno Canyon flood channel. The construction would generate air emissions that could contribute to the emission of greenhouse gases. This impact will be further analyzed in the Draft EIR.

Cumulative Impacts: The analysis of the effects of GHG is by definition a cumulative analysis. Thus the consideration of project impacts discussed above would analyze project impacts in combination with regional GHG emissions.

³⁷ County of Ventura, *Initial Study Assessment Guidelines*, 2011.

C.25 Community Character

Significance Criteria: Community character refers to the distinctive physical quality, attributes, or features of a community that sets it apart from other communities or areas. According to the Ventura County *Initial Study Assessment Guidelines*, significant impacts would occur when: (1) a project that is inconsistent with any of the policies or development standards relating to community character of the Ventura County General Plan Goals, Policies and Programs or applicable Area Plan, is regarded as having a potentially significant environmental impact; and/or (2) a project has the potential to have a significant impact on community character, if it either individually or cumulatively (when combined with recently approved, current, and reasonably foreseeable probable future projects) would introduce physical development that is incompatible with existing land uses, architectural form or style, site design/layout, or density/parcel sizes within the community in which the project site is located.

Proposed Project Impacts: The project site is located within the existing community of Casitas Springs within the Ojai Valley Area Plan.³⁸ The County has acquired three parcels currently occupied by single-family residential development in order to allow for a right-of-way that has the proper alignment for the conveyance pipeline. The proposed project consists of upgrading the existing capacity of an existing flood control channel to handle 100-year flows from Fresno Canyon. The project would not conflict or be incompatible with the surrounding adjacent residential and open space land uses. The project would benefit the Casitas Springs community through the reduction in flooding impacts. The project would also reduce the potential for the SR-33 to be closed as a result of flooding impacts. As such, there would be no adverse impact to the community character of the project area. This issue area will not be discussed in the Draft EIR.

Cumulative Impacts: The introduction to **Section C** provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. The majority of projects presented in **Table 2** require discretionary actions for the legalization or continued operation of an existing use, or minor modifications for the expansion of existing development. As implemented, these projects may create adverse impacts to community residents from increased environmental impacts, as well as proposing incompatible uses with existing land uses, architectural form or style, site design/layout, or density/parcel sizes within the community. However, these impacts would not be cumulatively considerable, since there would be no project-specific community character impacts.

³⁸ Ventura County General Plan, *Ojai Valley Area Plan*, (2008) Figure 3.

C.26 Housing

Significance Criteria: According to the Ventura County *Initial Study Assessment Guidelines*, any project that meets one of the following criteria would result in a significant impact under this issue area.

- Eliminate existing dwelling units
- Introduce a demand for housing by temporary construction workers or full-time employees

Proposed Project Impacts: The proposed project would not construct any new housing, nor would it introduce a demand for additional housing by temporary construction workers or full-time employees. However, two dwelling units would be temporarily removed from the housing market during the period prior to and during project construction. In 2011 and 2012, the VCWPD acquired three parcels in the project area, two of which have single-family residential houses (8220 Edison Drive [APN 061-0-230-175] and 8195 N. Ventura Avenue [APN 061-0-230-155]) and the third, which is an undeveloped lot (APN 061-0-230-365), in order to allow for a right-of-way that has the proper alignment for the conveyance pipeline. The three parcels were acquired by VCWPD without threat of condemnation several years after the preferred alignment alternative was identified and discussed at a public meeting in Casitas Springs in 2007. Construction of the proposed project would not require demolition of the existing housing units, and VCWPD intends to resell the two residential parcels after construction is completed. Furthermore, VCWPD intends to improve these two residential parcels by removing the existing septic systems and providing new sewer connections to the main sewer trunk line that will be relocated as part of the proposed project.

The Ventura County *Initial Study Assessment Guidelines* state

The significance of the impact depends on the number of dwelling units eliminated and the affordability of those units. Elimination of two or fewer dwelling units is not considered a significant project-specific or cumulative impact. Elimination of three or more dwelling units that are affordable to [lower income] households ... is considered a significant project-specific and cumulative impact on existing housing.

The two single-family residences referenced above are not considered affordable housing units, and they would not be demolished or permanently eliminated from the housing market. Therefore, housing impacts would be less than significant. This issue will be discussed in the Draft EIR.

Cumulative Impacts: The introduction to **Section C** provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. Some cumulative projects identified may require the removal or disruption to existing or planned housing. However, as the

proposed project would have less than significant impacts related to the removal of housing, it would not incrementally contribute to housing impacts associated with the removal or elimination of dwelling units.

While a number of cumulative projects identified in **Table 2** would include extensive construction workforce(s), as discussed within the Ventura County *Initial Study Assessment Guidelines*, construction worker demand would be a less than significant project-specific and cumulative impact because construction work is short-term and there is a sufficient pool of construction workers within Ventura County and the Los Angeles metropolitan regions. However, in reviewing the list of cumulative projects provided in **Table 2**, there is the potential for large-scale cumulative development projects to have a direct result in 30 or more new full-time-equivalent lower-income employees. Since the proposed project would have no operational employment, it would not incrementally contribute to housing demand impacts that would be cumulatively considerable. No cumulative impacts would occur.

C.27 Transportation/Circulation

C.27A Roads and Highways

Level of Service

Significance Criteria: According to the Ventura County *Initial Study Assessment Guidelines*, the minimum LOS for roadway segments and intersections is LOS D for all County thoroughfares and state highways within the unincorporated area of the County. A potentially significant adverse project-specific traffic impact would occur if the project would cause the existing LOS on a roadway segment to fall to an unacceptable level or if the project would add one or more peak hour trips to a roadway segment that is currently operating at an unacceptable LOS. A potentially significant adverse project-specific traffic impact would occur at an intersection if the project would exceed the thresholds shown in **Table 6**.

**Table 6
County of Ventura LOS thresholds**

Intersection LOS (Existing)	Increase in v/c or Trips Greater Than
A	0.20
B	0.15
C	0.10
D	10 peak-hour trips
E	5 peak-hour trips
F	1 peak-hour trip

Proposed Project Impacts: The proposed project would upgrade the existing flood control channel within Fresno Canyon which transports 100-year storm event flows, sediment, and debris. The construction of the project would occur beneath and adjacent to SR 33 which is a critical roadway on the Ventura County Regional Roadway Network. There would be temporary transportation impacts on SR 33 during construction due to the relocation of water and gas lines that lie within the roadway and the construction of a new storm flow conveyance pipeline under SR 33. Alternative 1 would require traffic detour during open trench method installation of the RC box culvert under SR 33. Alternative 2 avoids the need to detour traffic on SR 33 by installing a 12-foot diameter RC pipe underneath SR 33 using a horizontal boring method. As such, there would be potentially significant impacts to the level of service along this segment of SR 33 during construction. The Draft EIR will evaluate and provide mitigation measures for the impacts this project may have on the County's Regional Road Network and local roads, particularly SR 33, Parkview Drive, Edison Drive, and Sycamore Drive. Roadway level of service impacts will be analyzed further in the Draft EIR.

Maintenance trips generated by the proposed project after completion of project construction would be similar to existing maintenance related trips. As such, impacts would be less than significant after construction of the proposed project.

Cumulative Impacts: The introduction to **Section C** provides a list of the reasonably foreseeable projects located in the proposed project area. Cumulative projects may increase congestion on area roadways. Combined with construction traffic generated by the proposed project, this could result in decreased levels of service on area roadways during project construction. Cumulative impacts will therefore be analyzed in the EIR.

Safety/Design of Public Roads

Significance Criteria: According to the Ventura County *Initial Study Assessment Guidelines*, "most development projects affect the public road system through access encroachments, improving or widening existing roads, and/or constructing new road sections." Projects that comply with the County's road standards are generally considered to have less than significant impacts on the safety and design of the public road system and projects that impact intersections in a manner that exceeds the state's accident guidelines for signalization are considered significant.

Proposed Project Impacts: The proposed project would create potential impacts to safety and design of the public road system. The project includes construction of a new maintenance access road from SR 33 to the outlet structure on the Ventura River, with a new driveway constructed for access from the westbound lane of SR 33. The new driveway and maintenance access road would be constructed in

accordance with the County's road standards and with approval from Caltrans. Impacts related to roadway safety and design are anticipated to be less than significant. This issue will be discussed further in the Draft EIR.

Cumulative Impacts: The introduction to **Section C** provides a list of the reasonably foreseeable projects located in the proposed project area. The Ventura County *Initial Study Assessment Guidelines* indicate that a project will have a potentially significant adverse cumulative traffic impact if the affected road has been identified as experiencing a high accident rate, requires the installation of a traffic signal because of safety issues, or has been identified as having a substandard design. As these conditions are not applicable to the roadways in the project vicinity, the proposed project would not incrementally contribute to public road and highway safety and design impacts in a manner that would be cumulatively considerable.

Safety/Design of Private Access

Significance Criteria: According to the Ventura County *Initial Study Assessment Guidelines*, impacts associated with the safety and design of a private road involves the physical configuration of the road and its conformance with applicable state and local fire guidelines and ordinances.

Proposed Project Impacts: The proposed project would include two maintenance roads. One maintenance road would be approximately 500 feet long and immediately north of the open rectangular channel. An additional 100 feet of the maintenance road would be constructed on top of the culvert and then run north where it would terminate in an access ramp approximately 100 feet long with a 10 percent grade. The maintenance road would be 15 feet wide for most of its length and would include a vehicle turnaround area at its western end. A private access road would be incorporated into the maintenance road for use by a neighboring property owner. A fence would be built around the access road to prevent public access to the facility. The second maintenance road would be constructed at the eastern end of the facility and immediately north of the entrance structure. It would be approximately 400 feet long and connect to an existing access road for other facilities in the area. The design of the maintenance roads would comply with the Ventura County Fire Protection District's (VCFPD) adopted Private Road Guidelines. Impacts would be less than significant. This issue area will be discussed in the Draft EIR.

Cumulative Impacts: The introduction to **Section C** provides a list of the reasonably foreseeable projects located in the proposed project area. Cumulative projects within the area include private development, which could result in private roadway safety and design impacts. However, it is not anticipated that the proposed project's maintenance road construction would incrementally contribute to any private road safety and design impacts that would be cumulatively considerable. No cumulative impacts would occur.

Tactical Access

Significance Criteria: According to the Ventura County *Initial Study Assessment Guidelines*, a project would have a significant impact if there is a single access and the access road exceeds 800 feet in length.

Proposed Project Impacts: The proposed maintenance access roads would not exceed 800 feet in length and would comply with VCFPD Private Road Guidelines. As such, there would be no impact to the tactical access of the proposed project. This issue area will not be discussed in the Draft EIR.

Cumulative Impacts: The introduction to **Section C** provides a list of the reasonably foreseeable projects located in the proposed project area. As these projects would have no effect on access to the proposed project site, no cumulative impacts would occur relative to tactical access.

C.27B Pedestrian/Bicycle

Significance Criteria: According to the Ventura County *Initial Study Assessment Guidelines*, a project that will cause actual or potential barriers to existing or planned pedestrian/bicycle facilities may have a significant impact. In addition, projects that generate or attract pedestrian/bicycle traffic volumes meeting requirements for protected highway crossings or pedestrian and bicycle facilities may have a significant impact.

Proposed Project Impacts: The proposed project is a public infrastructure improvement project, which would not generate additional growth within the County. The Ojai Valley Trail is an existing pedestrian/bicycle facility that traverses the project area adjacent to the east bank of the Ventura River. The Ojai Valley Trail is a popular recreational opportunity for the community that is heavily used; therefore, the VCWPD would avoid closure of the trail during construction activities. During the approximately five to six weeks required for construction of the proposed storm flow conveyance features and outlet structure in the vicinity of the Ojai Valley Trail, the VCWPD would establish a temporary detour along a short section of property to the east of the trail for pedestrians and bicyclists to use. It is anticipated that a temporary detour would result in fewer impacts to the community than a temporary closure of the trail.

Under Alternative 1, a 30-foot-long (12-foot-wide by 9-foot-high) box culvert would be constructed below the Ojai Valley Trail. A 120-foot-long by 5-foot-deep by 6-inch-wide reinforced concrete cutoff wall would be installed along the downstream edge of the Ojai Valley Trail beginning about 70 feet north of and ending about 35 feet south of the conveyance structure. Under Alternative 2, a 120-foot-long by 6-inch-wide RC retaining wall (height varies) would be installed along the downstream edge of the Ojai Valley Trail beginning about 70 feet north of and ending about 35 feet south of the conveyance structure. The

retaining wall would be required to support the Ojai Valley Trail, and a portion of trail would need to be elevated a few feet above the existing grade to clear the proposed 12-foot-diameter pipe. Therefore, the proposed project would result in a temporary, but less than significant impact to the use of the Ojai Valley Trail. This issue area will be discussed further in the Draft EIR.

Cumulative Impacts: The introduction to **Section C** provides a list of the reasonably foreseeable projects located in the proposed project area. As these projects would have no effect on pedestrian or bicycle facilities or access in the immediate vicinity of the proposed project site, no cumulative impacts would occur relative to pedestrians and bicycles.

C.27C Bus Transit

Significance Criteria: According to the Ventura County *Initial Study Assessment Guidelines*, a project will normally have a significant impact on bus transit if it would substantially interfere with existing bus transit facilities or routes, or if it would create a substantial demand for bus transit facilities/services.

Proposed Project Impacts: The proposed infrastructure improvement project would not create a new demand on existing bus transit facilities or routes. Gold Coast Transit provides bus transit opportunities from the City of Ventura to Ojai via Route 16.³⁹ The bus route travels along SR 33 near Casitas Springs and includes a bus stop in Casitas Springs. Due to the distance from the project site to the Casitas Springs bus stop, the proposed project would not create a direct significant impact to access to bus transit facilities or routes. However, there may be an indirect significant impact to bus service due to potential traffic detours or delays on SR 33 during the construction of the proposed project. The Draft EIR will analyze the potential impacts to bus transit.

Cumulative Impacts: The introduction to **Section C** provides a list of the reasonably foreseeable projects located in the proposed project area. As discussed above, project construction could result in indirect significant impacts to bus service. Cumulative impacts will therefore be analyzed in the EIR.

C.27D Railroads

Significance Criteria: According to the Ventura County *Initial Study Assessment Guidelines*, a project will normally have a significant impact on a railroad if it would substantially interfere with an existing railroad's facilities or operations.

³⁹ Gold Coast Transit, *System Map*, <http://www.goldcoasttransit.org/Schedules/schedules-fall-2011.html>.

Proposed Project Impacts: There are no railroads within the vicinity of the project area. The nearest railroad is located to the south within the City of Ventura. As such, there would be no impacts to railroad facilities or operations. This issue area will not be discussed in the Draft EIR.

Cumulative Impacts: The introduction to **Section C** provides a list of the reasonably foreseeable projects located in the proposed project area. As these projects would have no effect on railroads, no cumulative impacts would occur. As addressed above, the proposed project would not incrementally contribute to railroad impacts in a manner that is cumulatively considerable. No cumulative impacts would occur.

C.27E Airports

Significance Criteria: According to the Ventura County *Initial Study Assessment Guidelines*, a project could potentially be incompatible with the operation of an airport if it is within the sphere of influence of an airport and if it includes features such as high buildings, residential units, refineries, churches, or schools.

Proposed Project Impacts: The project site is located approximately 12.5 miles north of the Oxnard Airport. The proposed project would not construct any structures higher than existing elevations. Therefore, there would be no impacts to the Oxnard Airport. This issue area will not be discussed in the Draft EIR.

Cumulative Impacts: The introduction to **Section C** provides a list of the reasonably foreseeable projects located in the proposed project area. Distant cumulative projects with the potential to be located near airport facilities could result in aviation impacts. However, as addressed above, no airport facilities are located within the immediate proposed project area. The proposed project would not incrementally contribute to aviation impacts in a manner that is cumulatively considerable. No cumulative impacts would occur.

C.27F Harbors

Significance Criteria: According to the Ventura County *Initial Study Assessment Guidelines*, a project would have an impact on a harbor if the construction or operation of the project will increase the demand for commercial boat traffic and/or adjacent commercial boat facilities.

Proposed Project Impacts: The proposed project site is not located near a harbor and implementation of the project would not affect the demand for boat traffic or facilities. Therefore, the proposed project would not interfere with harbor facilities or operations. No impacts would occur. This issue area will not be discussed in the Draft EIR.

Cumulative Impacts: The introduction to **Section C** provides a list of the reasonably foreseeable projects located in the proposed project area. While these cumulative projects may induce growth and thus increase harbor use, at a regional scale, their incremental contribution to direct or indirect cumulative impacts to the operation of a harbor or the demand for new or expanded harbor facilities are expected to be negligible. Additionally, as addressed above, the proposed project would not affect harbors. Therefore, no cumulative impacts would occur.

C.27G Pipelines

Significance Criteria: According to the Ventura County *Initial Study Assessment Guidelines*, a project would have a significant impact if it would substantially interfere with, or compromise the integrity or affect the operations of, an existing pipeline.

Proposed Project Impacts: Gas, water, electricity, sewer, and drainage conduits that cross project site would be relocated or avoided as part of Alternative 1. A 20-inch-diameter high-pressure gas line runs parallel to and east of SR 33 where it crosses Fresno Canyon. The box culvert would pass under this conduit with approximately 6 feet of clearance. Two smaller gas lines (6-inch-diameter and 10-inch-diameter) within the SR 33 right-of-way would require relocation. The water lines that exist in the area would be avoided. The most costly utility relocation would involve approximately 307 linear feet of 21-inch trunk sewer operated by the Ojai Valley Sanitary District. This sewer line would be relocated approximately 12 feet northward and the materials would be upgraded to ensure future access and reduce the risk of maintenance problems.

Under Alternative 2, the existing gas and water lines would be avoided; however, the existing 21-inch sewer line would need to be relocated. A new sewer line would be constructed 1 to 2 feet north of the existing line to allow for OVSD access and maintenance. The old line would be abandoned in place. A new sewer manhole would be added at the end of Edison Drive and another manhole would be added along the sewer line just west of the Ojai Valley Trail and south of the new outlet.

Impacts to pipelines as described above are anticipated be less than significant. This issue area will be discussed further in the Draft EIR.

Cumulative Impacts: The introduction to **Section C** provides a list of the reasonably foreseeable projects located in the proposed project area. Some of these cumulative developments could potentially have an effect on pipelines. As discussed above, project construction could result in indirect impacts to pipelines. Cumulative impacts will therefore be analyzed in the EIR.

C.28 Water Supply

In accordance with the Ventura County *Initial Study Assessment Guidelines*, this environmental issue area addresses domestic water supply, or a supply of potable water used for human consumption or connected to domestic plumbing fixtures in which the supply is obtained from an approved individual water supply system or a public water system operating with an unrevoked permit from the Ventura County Environmental Health Division or the California Department of Public Health.

C.28A Quality

Significance Criteria: Water quality refers to the chemical, biological, and physical quality of water used for human consumption. According to the Ventura County *Initial Study Assessment Guidelines*, a potential water supply impact may occur if a project requires a supply of domestic water.

Proposed Project Impacts: The proposed project would require a water supply for dust suppression during the eight-month construction period, but the project would not include the development of any habitable structures, and does not require a source of domestic water supply. No impacts to water supply quality would occur. This issue area will not be discussed in the Draft EIR.

Cumulative Impacts: As described above, the proposed project would not require a supply of domestic water. Therefore, it would not combine with the other past, present or reasonably foreseeable cumulative projects to contribute to a cumulative water supply quality impact. No cumulative impacts would occur.

C.28B Quantity

Significance Criteria: According to the Ventura County *Initial Study Assessment Guidelines*, the purpose of assessing this issue area is to ensure consistent and complete assessment of any direct and indirect impacts resulting from the General Plan requirement that each legal parcel requiring a domestic water source have a permanent supply of water for the project.

Proposed Project Impacts: As described above, the proposed project would not introduce a permanent water supply requirement and would not require a source of domestic water supply. Therefore, no impacts to water supply quantity would occur. This issue area will not be discussed in the Draft EIR.

Cumulative Impacts: As described above, the proposed project would not require a water source and would result in no impact to water supply quantity. Therefore, it would not combine with the other past, present or reasonably foreseeable cumulative projects to contribute to a cumulative water supply quantity impact. No cumulative impacts to water supply quantity would occur.

C.28C Fire Flow

Significance Criteria: According to the Ventura County *Initial Study Assessment Guidelines*, a project will be considered to have a significant impact associated with fire flow if one of the criteria listed below is met during project construction or operation.

- It cannot meet the required fire flow as determined by
 - The Insurance Services Office, Inc., (ISO) Guide for Determination of Required Fire Flow;
 - The Ventura County Waterworks Manual (VCWWM);
 - Ventura County Fire Protection District (VCFPD) Fire Code; and
 - Fire Prevention Standard 14.5.1, 14.5.2, and 14.5.3.
- It cannot provide an acceptable mitigation factor, i.e., fire sprinklers to allow for a reduction in the required fire flow
- A private water system cannot meet flow, duration, or reliability requirements as defined in the Ventura County Waterworks Manual and VCFPD Fire Code

Fire flow is defined as the number of gallons per minute of water available from a fire hydrant in the event of an emergency situation. Per the Ventura County *Initial Study Assessment Guidelines*, VCFPD staff responsible for a proposed project will review information submitted by the applicant relative to water availability, and may require plans for a private water system if an acceptable water purveyor has not been identified. Also as described in the Ventura County *Initial Study Assessment Guidelines*, no impact to fire flow would occur if a project would have no requirements for fire flow, or if a project is served by a water purveyor that can provide the required fire flow in accordance with the VCWWM and VCFPD Fire Code.

Proposed Project Impacts: The proposed project does not require fire flow. No impacts would occur. This issue area will not be discussed in the Draft EIR.

Cumulative Impacts: The introduction to **Section C** provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. As described above, the proposed project would not result in an impact related to fire flow requirements. Therefore, it would not combine with the other past, present or reasonably foreseeable cumulative projects to contribute to a cumulative impact to fire flow requirements. No cumulative impacts to fire flow requirements would occur.

C.29 Waste Treatment/Disposal

C.29A Individual Sewage Disposal System

Significance Criteria: According to the Ventura County *Initial Study Assessment Guidelines*,⁴⁰ compliance with applicable sections of the following documents must be demonstrated to ensure no significant impact:

- Ventura County Building Code, Articles 1 and 6
- Ventura County Sewer Policy
- Ventura County Ordinance Code, Division 4
- Uniform Plumbing Code
- Environmental Health Division Onsite Wastewater Treatment System Technical Information Manual
- California Regional Water Quality Control Board Basin Plans

Proposed Project Impacts: A sewage disposal system can be defined as a system which disposes of domestic waste (sewage) generated by individual residences and businesses located in areas without access to public sewer service. The proposed project consists of upgrading the storm water conveyance facility capacity to handle additional water flows, sediment, and debris within the Fresno Canyon watershed. During construction, the project contractor would supply portable toilets for workers and would be responsible for the disposal of generated sewage. As the number of construction workers would be minimal, with all workers anticipated to come from within the Ventura County area, no impacts to existing sewage treatment facilities are expected to occur from on-site portable toilets.

As discussed in the housing impacts section of this Initial Study, VCWPD intends to improve two residential parcels acquired for construction of the project (i.e., 8220 Edison Drive [APN 061-0-230-175] and 8195 N. Ventura Avenue [APN 061-0-230-155]) by removing the existing individual septic systems and providing new sewer connections to the main sewer trunk line that will be relocated as part of the proposed project. VCWPD intends to resell the two residential parcels after construction is completed. Therefore, there would be a less than significant impact to individual sewage disposal systems. This issue area will not be discussed in the Draft EIR.

⁴⁰ County of Ventura, *Initial Study Assessment Guidelines*, 2011.

Cumulative Impacts: As discussed above, the construction and operation of the proposed project would not require an on-site sewage disposal system, and the project would involve beneficial improvements to two existing parcels currently utilizing individual sewage disposal systems. Therefore, it would not combine with the past, present or reasonably foreseeable projects outlined in the introduction to **Section C** to contribute to sewage disposal system impacts that would be cumulatively considerable. No cumulative impacts would occur.

C.29B Sewage Collection/Treatment Facilities

Significance Criteria: According to the Ventura County *Initial Study Assessment Guidelines*, any project which would individually or cumulatively generate sewage effluent which would be discharged to and exceed the capacity of an existing facility or ancillary facilities would have a potentially significant impact; however, if the project incorporates project conditions and mitigation measures for improvements required by the sewer entity or Regional Water Board, there would be a less than significant impact.⁴¹

Proposed Project Impacts: The proposed flood conveyance improvement project would not generate sewage; however, as discussed under **Subsection C.29A**, two residences would be converted from individual sewage disposal systems to connect with the nearby sewer trunk line that would be relocated as part of the project. The proposed project would not utilize an individual sewage disposal system. The Sanitation District has indicated that adequate sewer capacity is available for this project. Since the project would abandon the two existing septic systems and connect the structures to the public sewer, the potential impacts relative to on-site sewage disposal would be less than significant. This issue area will not be analyzed in the project EIR.

Cumulative Impacts: The introduction to **Section C** provides a list of the reasonably foreseeable projects located in the proposed project area. These cumulative projects include retail development and school expansions that may induce growth and thus increase demand on sewage collection/treatment facility use, at a regional scale. However, as addressed above, the proposed project would have less than significant impacts, and no cumulative impacts are expected to occur.

⁴¹ County of Ventura, *Initial Study Assessment Guidelines*, 2011.

C.29C *Solid Waste Management*

Significance Criteria: According to the Ventura County *Initial Study Assessment Guidelines*, any project that generates solid waste would have an impact on the demand for solid waste disposal capacity in Ventura County.⁴²

Proposed Project Impacts: Clear and grub green wastes generated during construction of the proposed project would be hauled to the nearest green waste recycling facility for appropriate disposal. The only soil spoils associated with the project would be from tree removal (soil within tree root balls). An on-site raw material excavation and re-use/export plan would be implemented for each work task. Furthermore, the VCWPD would incorporate into the project's contract specifications requirements to comply with Ventura County Ordinances #4445 (solid waste handling, disposal, waste reduction, waste diversion) and #4421 (requirements for the diversion of construction and demolition debris from landfills by recycling, reuse, salvage), to the extent practicable. Ventura County Ordinances #4445 and #4421 assist the County in its efforts to meet the requirements of Assembly Bill 939 which mandates all jurisdictions in California to divert a minimum of 50 percent of their solid waste from landfill disposal. Solid waste impacts are anticipated to be less than significant. This issue area will be discussed in the Draft EIR.

Cumulative Impacts: The introduction to **Section C** provides a list of the reasonably foreseeable projects located in the proposed project area. These cumulative projects include retail development and school expansions that may induce growth and thus increase demand on solid waste management and collection, at a regional scale. However, as addressed above, the proposed project would have less than significant impacts to solid waste management. Therefore, less than significant cumulative impacts would occur.

C.29D *Solid Waste Facilities*

Significance Criteria: According to the Ventura County *Initial Study Assessment Guidelines*,⁴³ solid waste facilities shall be in compliance with the following statues and regulations and are subject to enforcement by the County of Ventura Resource Management Agency, Environmental Health Division (EHD):

- California Health and Safety Code, Division 104, Part 13, Chapter 4, Article 7
- California Health and Safety Code, Division 104, Part 14
- California Code of Regulations, Title 14, Division 7

⁴² County of Ventura, *Initial Study Assessment Guidelines*, 2011.

⁴³ County of Ventura, *Initial Study Assessment Guidelines*, 2011.

- California Code of Regulations, Title 27, Division 2
- California Public Resources Code, Division 30
- Ventura County Ordinance Code, Division 4, Chapter 7

Solid waste operations and facilities are those projects that involve solid waste handling, storage, processing and disposal activities that are subject to solid waste regulations enforced by the Local Enforcement Agency/EHD. Solid waste facilities operate under the authority of the Local Enforcement Agency, which under the proposed project would be the Ventura County EHD. Per the Ventura County *Initial Study Assessment Guidelines*, if a proposed project does not involve a solid waste operation or facility, it would have no impact.⁴⁴

Proposed Project Impacts: The proposed project does not directly involve a solid waste operation or facility. As discussed above under **Subsection C.29C**, the proposed project would comply with the Ventura County Ordinance Nos. 4445 and 4421 requiring the minimization and recycling of construction and demolition related debris. Therefore, there would be no impact on solid waste facilities. This issue area will not be discussed in the Draft EIR.

Cumulative Impacts: The introduction to **Section C** provides a list of the reasonably foreseeable projects located in the proposed project area. These cumulative projects include retail development and school expansions that may induce growth and thus increase demand on solid waste disposal facilities, at a regional scale. However, as addressed above, the proposed project is anticipated to generate a minimal amount of solid waste material and is not anticipated to impact the available capacity of waste disposal facilities serving the proposed project area, resulting in no impact to solid waste facilities. Therefore, no cumulative impacts would occur.

C.30 Utilities

Significance Criteria: A proposed project could result in impacts to utilities if it would cause a disruption or re-routing of an existing utility facility or increase demand on a utility that results in expansion of an existing utility facility which has the potential for secondary environmental impacts.⁴⁵ These facilities include: electrical generation plants, transmission substations and transmission lines; fixed natural gas

⁴⁴ County of Ventura, *Initial Study Assessment Guidelines*, 2011.

⁴⁵ County of Ventura, *Initial Study Assessment Guidelines*, 2011.

transmission and distribution systems; and, structures such as radio and television transmitting and receiving antennas, radar stations, microwave towers and cellular and hard line telephone facilities.⁴⁶

Proposed Project Impacts: There are no communication facilities located adjacent to or within the area of construction of the proposed project. Gas, water, electricity, sewer, and drainage conduits that cross project site would be relocated or avoided as part of Alternative 1. A 20-inch-diameter high-pressure gas line runs parallel to and east of SR 33 where it crosses Fresno Canyon. The box culvert would pass under this conduit with approximately 6 feet of clearance. Two smaller gas lines (6-inch-diameter and 10-inch-diameter) within the SR 33 right-of-way would require relocation. The water lines that exist in the area would be avoided. The most costly utility relocation would involve approximately 307 linear feet of 21-inch trunk sewer operated by the Ojai Valley Sanitary District. This sewer line would be relocated approximately 12 feet northward and the materials would be upgraded to ensure future access and reduce the risk of maintenance problems. The existing sewer line would remain functional until the newly relocated line is completed, reducing potential disruption to service; then the old line would be abandoned in place.

Under Alternative 2, the existing gas and water lines would be avoided; however, the existing 21-inch sewer line would need to be relocated. A new sewer line would be constructed 1 to 2 feet north of the existing line to allow for OVSD access and maintenance. The existing line would remain functional until the newly relocated line is complete, reducing potential disruption to service; then the old line would be abandoned in place. A new sewer manhole would be added at the end of Edison Drive and another manhole would be added along the sewer line just west of the Ojai Valley Trail and south of the new outlet.

Since the proposed project would cause temporary disruption to and permanent rerouting of existing utility facilities, it may result in less than significant impacts to utilities. This issue area will be analyzed in the draft EIR.

Cumulative Impacts: The introduction to **Section C** provides a list of the reasonably foreseeable projects located in the proposed project area. These cumulative projects include retail development and school expansions that may induce growth and thus increase demand on electrical, natural gas, and communications facilities, at a regional scale. As the proposed project has the potential to temporarily affect utility facilities during project construction, the EIR will analyze cumulative impacts.

⁴⁶ County of Ventura, *Initial Study Assessment Guidelines*, 2011.

C.31 Flood Control/Drainage

C.31A WPD Facilities/Watercourses

Significance Criteria: According to the Ventura County *Initial Study Assessment Guidelines*, a project will be considered to have a significant impact associated with VCWPD flood control facilities/watercourses if one of the criteria listed below is met during project construction or operation.

- Any project that will, either directly or indirectly, impact flood control facilities and watercourses by obstructing, impairing, diverting, impeding, or altering the characteristics of the flow of water, resulting in exposing adjacent property and the community to increased risk for flood hazards, shall be considered to have a potentially significant impact. Examples are listed below.
 - Reducing the capacity of flood control facilities and watercourses. This includes the planting of any vegetation within the watercourse or on the banks thereof.
 - Eroding watercourse bed and banks due to high velocities, changes in adjacent land use, encroachments into the channel such as bridges, and loading the top of the channel embankment with structures.
 - Deposition of any material of any kind in a watercourse.
 - Placement of a structure that encroaches on a flood control facility or that does not have sufficient setback from a watercourse.

Proposed Project Impacts: The proposed project would improve the existing flood capacity for the flood control facility for Fresno Canyon. The proposed project would be consistent with the Ojai Valley Area Plan Goal 4.4.1: Provide and adequately maintain flood control and drainage facilities as necessary for the project of life and property. The proposed project would be designed according to the consolidated ordinance Ventura County Watershed Protection District Ordinance No. WP-1, adopted January 12, 2010, Ventura County Flood Control District (VCFCD) Design Manual, 1968, as amended, and VCWPD Hydrology Manual, 2006, most recent issue dated 2010.

The proposed project would effect a substantial change in VCWPD flood control facilities. Therefore, while the proposed project would ameliorate an existing deficiency in such facilities, the EIR will analyze the potential for project development to affect flooding hazards in the project area.

Cumulative Impacts: The introduction to **Section C** provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. As discussed above, the proposed project would effect a substantial change in VCWPD flood control facilities. Therefore, the project EIR will evaluate potential cumulative impacts to flood control/drainage facilities.

C.31B Other Facilities/Watercourses

Significance Criteria: According to the Ventura County *Initial Study Assessment Guidelines*, the Ventura County Flood Insurance Study and associated maps define Areas of Special Flood Hazard that are subject to the authority of the Ventura County Flood Plain Management Ordinance. The natural channels and facilities not designated within these source documents and the impacts thereon are the focus of review under this guideline. In reviewing a project for impacts, the following are to be given consideration:

- The possibility of deposition of sediment and debris materials within existing channels and allied obstruction of flow.
- The capacity of the channel and the potential for overflow during design storm conditions.
- The potential for increased runoff and the effects on Areas of Special Flood Hazard and regulatory channels both on and off-site.

Any increase in flow to and from natural and manmade drainage channels and facilities is required to be considered within the existing framework of grading and building code ordinances, and any project that does not comply with the requirements of such regulations, manuals and standards is considered as having a potentially significant project and cumulative impact.

Impacts to flood control and drainage facilities that are owned and maintained by an entity other than the VCWPD would occur if a project affects the extent of the floodplain, the capacity of a drainage facility or channel, or the velocity of flow within a drainage facility or channel.

Proposed Project Impacts: The proposed project would improve the Fresno Canyon flood conveyance facilities to transport additional water runoff, sediment, and debris. The proposed facility improvements will be designed to convey fully bulked flows resulting from the 100-year flood event. Implementation of the proposed project would greatly reduce flood-related property damage in the community of Casitas Springs and reduce the likelihood of temporary closure of SR 33 due to flood inundation. The proposed project would comply with existing regulations applicable to drainage of the project site during the construction and grading activities. Potential impacts related to other facilities and watercourses are anticipated to be less than significant. The Draft EIR will analyze the potential impacts of project implementation.

Cumulative Impacts: The introduction to **Section C** provides a discussion of the past, present and reasonably foreseeable projects associated with the proposed project area. The EIR will evaluate potential cumulative impacts related to other facilities and watercourses.

C.32 Law Enforcement/Emergency Services

Significance Criteria: According to the Ventura County *Initial Study Assessment Guidelines*,⁴⁷ public safety depends on the timely availability of law enforcement and emergency service personnel. Projects that increase demand for law enforcement or emergency services may have a significant adverse impact on public safety unless mitigated.

Law enforcement and emergency service personnel consist of all individuals, both sworn and not sworn, who are used by the Ventura County Sheriff's Department to protect the County's citizens. A project that directly or indirectly contributes to a population increase would have the potential to impact law enforcement and emergency service personnel and equipment.

Proposed Project Impacts: The proposed project would improve the capacity of the Fresno Canyon flood control channel to handle a 100-year peak bulk flow rate. The project would include two maintenance roads. The western most road would have a fence built around the access road to prevent public access to the facility. The project would not directly or indirectly cause a population increase. Therefore, there would be no impact on law enforcement or emergency services. This issue area will not be discussed in the Draft EIR.

Cumulative Impacts: The introduction to **Section C** provides a list of the reasonably foreseeable projects located in the proposed project area. The proposed project is not growth inducing and would not be anticipated to require the use of local law enforcement or emergency services. Consequently, it would not combine with other past, present and reasonably foreseeable projects to contribute to an impact to law enforcement and emergency services that would be cumulatively considerable. No cumulative impacts would occur.

C.33 Fire Protection

C.33A Distance/Response Time

Significance Criteria: According to the Ventura County *Initial Study Assessment Guidelines*, project distance from a full time paid fire department is considered a significant impact if the project is in excess of 5 miles, measured from the apron of the fire station to the structure or pad of the proposed structure.⁴⁸

⁴⁷ County of Ventura, *Initial Study Assessment Guidelines*, 2011.

⁴⁸ County of Ventura, *Initial Study Assessment Guidelines*, 2011.

Proposed Project Impacts: The nearest fire station is Fire Station 23 of the Ventura County Fire Department and is located approximately 2 miles to the north of the project site. The proposed project does not involve the construction of fire-prone facilities. As such, the proposed project would not impact the fire response time of fire protection services. This issue area will not be discussed further in the Draft EIR.

Cumulative Impacts: The introduction to **Section C** provides a list of the reasonably foreseeable projects located in the proposed project area. As discussed above, proposed construction activities would be located within 5 miles of the nearest fire station; therefore, the proposed project would not combine with other past, present and reasonably foreseeable projects to contribute to an impact to fire protection services (distance and response) that would be cumulatively considerable. No cumulative impacts would occur.

C.33B Personnel/Equipment/Facilities

Significance Criteria: According to the Ventura County *Initial Study Assessment Guidelines*, one firefighter is required for every 3,000 to 4,000 persons, depending on density.⁴⁹

Proposed Project Impacts: The proposed project would not increase the population of the project area; consequently, it would not increase the demand for fire protection service personnel, equipment, or facilities. In addition, the proposed project would not involve any type of structural development that would require an increase in long-term fire protection service. No impacts with regard to the personnel, equipment, or facilities of fire protection services would occur. This issue area will not be discussed further in the Draft EIR.

Cumulative Impacts: The introduction to **Section C** provides a list of the reasonably foreseeable projects located in the proposed project area. As discussed above, the proposed project would not increase the population of the project area; therefore, the proposed project would not combine with other past, present and reasonably foreseeable projects to contribute to an impact to fire protection services that would be cumulatively considerable. No cumulative impacts would occur.

⁴⁹ County of Ventura, *Initial Study Assessment Guidelines*, 2011.

C.34 Education

C.34A Schools

Significance Criteria: According to the Ventura County *Initial Study Assessment Guidelines*, any project that meets the following criteria would result in a significant impact under this issue area.⁵⁰

- Substantially interfere with the operations of an existing school facility.

Proposed Project Impacts: The nearest school to the project site is Sunset Elementary School (Ventura Unified School District) located approximately 1.75 miles to the north. The proposed project is a public improvement project and is therefore considered a non-residential project and would not affect the demand for schools within the County. No impacts to school facilities would occur.

Any potential impact on school facilities (public or private) that is not related to demand is discussed and analyzed under the appropriate subject area (e.g., noise, traffic) of this initial study.

Cumulative Impacts: The introduction to **Section C** provides a list of the reasonably foreseeable projects located in the proposed project area. As discussed above, the proposed project would not affect the demand for schools in the County. Therefore, the proposed project would not combine with other past, present or reasonably foreseeable projects to contribute to an impact to educational facilities that would be cumulatively considerable. No cumulative impacts would occur.

C.34B Libraries

Significance Criteria: According to the Ventura County *Initial Study Assessment Guidelines*, any project that meets one of the following criteria would result in a significant impact under this issue area.⁵¹

- Substantially interfere with the operations of an existing public library facility.
- Put additional demands on a public library facility that is currently deemed overcrowded.
- Limit the ability of individuals to access public library facilities by private vehicle or alternative transportation modes.

Proposed Project Impacts: The proposed project involves the improvement of the existing Fresno Canyon Flood Control Facility to be able to transfer the 100-year bulked flow rate within the watershed and would not generate additional demand for library services. The nearest Ventura County Library

⁵⁰ County of Ventura, *Initial Study Assessment Guidelines*, 2011.

⁵¹ County of Ventura, *Initial Study Assessment Guidelines*, 2011.

facility would be the Oak View Library located approximately 2.5 miles north of the project site. The proposed project is not considered a residential project and is not located adjacent to a public library. Therefore, the project would have no impacts to public library facilities and services. This issue area will not be discussed in the Draft EIR.

Cumulative Impacts: The introduction to **Section C** provides a list of the reasonably foreseeable projects located in the proposed project area. As discussed above, the proposed project would neither affect the demand for public library facilities, nor interfere with the operations of or accessibility to the Oak View Library. Therefore, the proposed project would not combine with other past, present or reasonably foreseeable projects to contribute to an impact to public libraries that would be cumulatively considerable. No cumulative impacts would occur.

C.35 Recreation

As described in the Ventura County *Initial Study Assessment Guidelines*, a project will have a significant impact on recreation if it would cause an increase in the demand for recreation, parks, and/or trails and corridors or would cause a decrease in recreation, parks, and/or trails or corridors when measured against the standards discussed below.

Significance Criteria: According to the Ventura County *Initial Study Assessment Guidelines*, a project would result in a significant impact if it would cause an increase in the demand for recreation when measured against the following standards.

- Local Parks/Facilities - 5 acres of developable land (less than 15 percent slope) per 1,000 population.
- Regional Parks/Facilities - 5 acres of developable land per 1,000 population.
- Regional Trails/Corridors - 2.5 miles per 1,000 population.

Proposed Project Impacts: A segment of the Ojai Valley Trail traverses the western portion of the project site. Foster Park is the nearest park to the project site located approximately 0.25 mile to the south. The proposed project is a public infrastructure improvement project which would not generate additional population growth within the County and therefore would not increase the demand for recreation facilities or parks. The proposed project would not impede future development of Recreation Parks/Facilities and/or Regional Trails/Corridors.

Construction of the proposed storm flow conveyance structure would require a temporary detour or a temporary closure of the segment of the Ojai Valley Trail within the project site. Under Alternative 1, a 30-foot-long (12-foot-wide by 9-foot-high) box culvert would be constructed below the Ojai Valley Trail.

A 120-foot-long by 5-foot-deep by 6-inch-wide reinforced concrete cutoff wall would be installed along the downstream edge of the Ojai Valley Trail beginning about 70 feet north of and ending about 35 feet south of the conveyance structure. Under Alternative 2, A 120-foot-long by 6-inch-wide RC retaining wall (height varies) would be installed along the downstream edge of the Ojai Valley Trail beginning about 70 feet north of and ending about 35 feet south of the conveyance structure. The retaining wall would be required to support the Ojai Valley Trail, and a portion of trail would need to be elevated a few feet above the existing grade to clear the proposed 12-foot-diameter pipe. As such, there would be temporary, but less than significant impacts to the Ojai Valley Trail and to recreational resources. This issue area will be analyzed in the Draft EIR.

Cumulative Impacts: The introduction to **Section C** provides a list of the reasonably foreseeable projects located in the proposed project area. The impacts associated with the proposed project would not increase the demand for local parks or facilities; consequently, it would not contribute to local park or facility impacts that would be cumulatively considerable. No cumulative impacts to local parks or facilities would occur.

D. INITIAL STUDY FINDINGS AND DETERMINATION

<u>MANDATORY FINDINGS OF SIGNIFICANCE</u>		<u>YES/ MAYBE</u>	<u>NO</u>
Based on the information contained within Sections B and C:			
1.	Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or 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 a Rare or Endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	X	
2.	Does the project have the potential to achieve short-term, to the disadvantage of long-term, environmental goals? (A short-term impact on the environment is one that occurs in a relatively brief, definitive period of time while long-term impacts will endure well into the future).	X	
3.	Does the project have impacts that are individually limited, but cumulatively considerable? "Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effect of other current projects, and the effect of probable future projects. (Several projects may have relatively small individual impacts on two or more resources, but the total of those impacts on the environment is significant).	X	
4.	Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?		X

Discussion

1. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or 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 a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?

As discussed in **Subsections C.4, C.7, and C.8**, above, the proposed project has the potential to negatively impact biological, paleontological, and cultural resources. The proposed project would be required to prepare an EIR subject to the requirements of the *State CEQA Guidelines* to analyze the project’s potential for impacting these resources.

2. Does the project have the potential to achieve short-term, to the disadvantage of long-term, environmental goals? (A short-term impact on the environment is one that occurs in a relatively brief, definitive period of time while long-term impacts will endure well into the future).

The proposed project was designed by the Ventura County Watershed Protection District to ameliorate existing flooding hazards in the community of Casitas Springs. However, project development has the potential, as discussed in **Section C**, to affect biological, paleontological, and cultural resources, as well as flood control and drainage in the long term.

3. Does the project have impacts that are individually limited, but cumulatively considerable? “Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effect of other current projects, and the effect of probable future projects. (Several projects may have relatively small individual impacts on two or more resources, but the total of those impacts on the environment is significant).

Section C identifies a number of project-specific impacts that could potentially combine with impacts caused by cumulative projects to create a significant cumulative impact. The project EIR will analyze both project-specific and cumulative impacts.

4. Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?

The proposed project would not cause any adverse impacts on human beings, either directly or indirectly, that cannot be mitigated to a level of less than significant. Potential direct and indirect impacts on human beings would be temporary in nature, and would be limited to the project’s eight-month construction period. No adverse impacts would occur following completion of the project construction period. To the contrary, implementation of the proposed project would result in beneficial impacts associated with flood hazard protection, and long-term net benefits to human beings would include protection of developed areas in the Casitas Springs area from hazards associated with large storm events. As such, the proposed project would not have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly.

DETERMINATION OF ENVIRONMENTAL DOCUMENT	
On the basis of this initial evaluation:	
<input type="checkbox"/>	I find the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION should be prepared.
<input type="checkbox"/>	I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because the mitigation measure(s) described in Section C of the Initial Study will be applied to the project. A MITIGATED NEGATIVE DECLARATION should be prepared.
<input checked="" type="checkbox"/>	I find the proposed project, individually and/or cumulatively, MAY have a significant effect on the environment and an ENVIRONMENTAL IMPACT REPORT is required.*
<input type="checkbox"/>	I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
<input type="checkbox"/>	I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.



 Tully Clifford
 Director
 Ventura County Watershed Protection District

Date 3/21/2013

E. REFERENCES

- California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Ventura County *Important Farmland*, 2010.
- California Department of Toxic Substances Control, *Enviorstor Database*. <http://www.envirostor.dtsc.ca.gov/public/>.
- California Department of Forestry and Fire Protection, *Fire Hazard Severity Zones in SRA: Ventura County*, 2007.
- California Environmental Protection Agency, State Water Resources Control Board, General Permit For Storm Water Discharges Associated with Construction and Land Disturbance Activities, Order No. 2010-0014-DWQ, NPDES No. CAS000002.
- County of Ventura, *General Plan Hazards Appendix*, 2011.
- County of Ventura, *General Plan Resources Appendix*, 2011.
- County of Ventura, *Ojai Valley Area Plan*, 2008.
- County of Ventura, *Initial Study Assessment Guidelines*, 2011.
- Federal Emergency Management Administration, *Cultural Resources Technical Report, Fresno Canyon Flood Mitigation*, 2009.
- Gold Coast Transit, *System Map*, <http://www.goldcoasttransit.org/Schedules/schedules-fall-2011.html>.
- State Water Resources Control Board, Water Quality Order 2003-0007-DWQ, *NPDES General Permit for Storm Water Discharges associated with Construction Activity from Small Linear Underground/Overhead Projects*.
- Ventura County Resource Management Agency, GIS Development & Mapping Services, *FEMA Floodplains Map*, 2011.
- Ventura County Resource Management Agency, GIS Development & Mapping Services, *Landslides Map*, 2010.
- Ventura County Resource Management Agency, GIS Development & Mapping Services, *Expansive Soils Map*, 2011.
- Ventura County Resource Management Agency, GIS Development & Mapping Services, *Tsunami Inundation Map*, 2011.
- Ventura County Resource Management Agency, GIS Development & Mapping Services, *Liquefaction Map*, 2010.
- Ventura County Watershed Protection District, Water and Environmental Resource Division, *2011 Groundwater Section Annual Report*, 2012.

F. INITIAL STUDY LIST OF PREPARERS AND REVIEWERS

In accordance with *State CEQA Guidelines* Section 15063(d)(6), the following tables list the individuals that assisted with the preparation and review of this Initial Study.

Ventura County Initial Study Reviewers

Name	Affiliation	Role
Elizabeth Martinez	Ventura County Watershed Protection District	Environmental Planner
Pam Lindsey	Ventura County Watershed Protection District	Watershed Ecologist
Masood Jilani	Ventura County Watershed Protection District	Project Engineer
Brian Trushinski	Ventura County Watershed Protection District	Floodplain Manager
Tom Wolfington	Ventura County Watershed Protection District	Permits Manager
Rick Viergutz	Ventura County Watershed Protection District	Groundwater Resources Manager
Ewelina Mutkowska	Ventura County Watershed Protection District	Stormwater Program Manager
Melinda Talent	Ventura County Resource Management Agency Environmental Health Division	Land Use Coordinator
Theresa Lubin	Ventura County General Services Agency	Parks Maintenance
Shelley Sussman	Ventura County Resource Management Agency Planning Department	Planner
Christina Danko	Ventura County Resource Management Agency Planning Department	Biologist
Jim Myers	Ventura County Public Works Agency	Development Services –Erosion/Siltation
Jim O’Tousa	Ventura County Public Works Agency	Development Services – Geology
Ben Emami	Ventura County Public Works Agency Transportation Department	Transportation Engineering Manager
Pandee Leachman	Ventura County Public Works Agency Integrated Waste Management Division	Environmental Resource Analyst
John Dodd	Ventura County Fire Protection District	Senior Fire Inspector
Alicia Stratton	Ventura County Air Pollution Control District	Air Quality Analyst
Rudy Martel	Office of the Agricultural Commissioner	Agricultural Land Use Planner
Allan Coulson	Ventura County Department of Airports	Airports Project Manager
Dale Carnathan	Ventura County Sheriff’s Department	Program Administrator, Office of Emergency Services

Initial Study Preparers

Name	Affiliation	Role
Susan Tebo	Impact Sciences, Inc.	Managing Principal
Dave Crawford	Impact Sciences, Inc.	Biological Services Director
Eric Bell	Impact Sciences, Inc.	Air Quality Analyst
Douglas Brown	Impact Sciences, Inc.	Project Planner

Fresno Canyon Flood Mitigation Project
NOP Initial Study Comments Received

Agency	Name	Date Received	Comments
Governor's Office of Planning and Research, State Clearinghouse	Scott Morgan, Director	3/26/13	Acknowledged receipt of NOP and distribution to State agencies.
U.S. Department of Homeland Security, FEMA Region IX	Gregor Blackburn, CFM, Branch Chief	3/29/13	General comment letter requesting DEIR consider current FIRMs and the NFIP floodplain management building requirements.
Native American Heritage Commission	Dave Singleton, Program Analyst	3/29/13	General comment letter requesting DEIR list known cultural resources on or adjacent to the APE and include a professional report and mitigation measures. Provided a current Native American Contacts list.
California Department of Fish and Wildlife	Betty Courtney, Environmental Program Manager, South Coast Region	4/26/13	General comment letter recommending items to be included/considered in the DEIR with regard to biological resources.
Ventura County Watershed Protection District	Tom Wolfington, Permit Section Manager	3/27/13	Confirmed that previous comments made 2/15/13 during internal agency review have been adequately incorporated.
Ventura County Public Works Agency	Jim O'Tousa, Development and Inspection Services	4/16/13	Requested DEIR include further analysis on topic of landslides and include a discussion of load carrying capacity with respect to debris flows.
Ventura County Air Pollution Control District	Alicia Stratton, Air Quality Analyst	4/22/13	Reiterated previous comments made 2/13/13 during internal agency review; concurred with Initial Study air quality section findings; requested DEIR evaluate all emissions from construction activities.
Ventura County General Services Agency, Parks Department	Theresa Lubin, Parks Maintenance	4/23/13	Acknowledged receipt of NOP. Requested DEIR include analysis of potential temporary impact to the Ojai Valley Trail.



EDMUND G. BROWN JR.
GOVERNOR

STATE OF CALIFORNIA
GOVERNOR'S OFFICE of PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT



KEN ALEX
DIRECTOR

Notice of Preparation

March 26, 2013

To: Reviewing Agencies
Re: Fresno Canyon Flood Mitigation Project
SCH# 2013031072

Attached for your review and comment is the Notice of Preparation (NOP) for the Fresno Canyon Flood Mitigation Project draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

Elizabeth Martinez
Ventura County Watershed Protection District
800 S. Victoria Avenue
Ventura, CA 93009-1600

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Attachments
cc: Lead Agency

RECEIVED

MAR 29 2013

WATERSHED PROTECTION DIST.

**Document Details Report
State Clearinghouse Data Base**

SCH# 2013031072
Project Title Fresno Canyon Flood Mitigation Project
Lead Agency Ventura County Watershed Protection District

Type NOP Notice of Preparation
Description The Ventura County Watershed Protection District is proposing to reduce the risk of flooding in the community of Casitas Springs through the construction of a new bypass storm drain facility to transport floodwaters, sediment, and debris from Fresno County to the Ventura River. The project is anticipated to start construction in 2015 and will take about eight months to complete.

Lead Agency Contact

Name Elizabeth Martinez
Agency Ventura County Watershed Protection District
Phone 805 654 2001 **Fax**
email
Address 800 S. Victoria Avenue
City Ventura **State** CA **Zip** 93009-1600

Project Location

County Ventura
City
Region
Cross Streets SR 33 / Casitas Vista Road
Lat / Long
Parcel No.

Township	Range	Section	Base
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Proximity to:

Highways Hwy 33
Airports
Railways
Waterways Ventura River
Schools
Land Use Flood Control facilities

Project Issues

**Reviewing
Agencies**

Date Received 03/26/2013 **Start of Review** 03/26/2013 **End of Review** 04/24/2013

Notice of Completion & Environmental Document Transmittal

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613
For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

SCH # 2013031072

Project Title: Fresno Canyon Flood Mitigation Project

Lead Agency: Ventura County Watershed Protection District Contact Person: Elizabeth Martinez
Mailing Address: 800 South Victoria Avenue Phone: 805-654-2001
City: Ventura Zip: 93009-1600 County: Ventura

Project Location: County: Ventura City/Nearest Community: Casitas Springs
Cross Streets: State Route 33 / Casitas Vista Road Zip Code: 93001
Longitude/Latitude (degrees, minutes and seconds): ... N / ... W Total Acres:
Assessor's Parcel No.: Section: Twp.: Range: Base:
Within 2 Miles: State Hwy #: 33 Waterways: Ventura River
Airports: Railways: Schools:

Document Type:

CEQA: [X] NOP [] Draft EIR NEPA: [] NOI Other: [] Joint Document
[] Early Cons [] Supplement/Subsequent EIR [] EA [] Final Document
[] Neg Dec (Prior SCH No.) [] Draft EIS [] Other:
[] Mit Neg Dec Other:

Local Action Type:

[] General Plan Update [] Specific Plan [] Rezone [] Annexation
[] General Plan Amendment [] Master Plan [] Prezone [] Redevelopment
[] General Plan Element [] Planned Unit Development [] Use Permit [] Coastal Permit
[] Community Plan [] Site Plan [] Land Division (Subdivision, etc.) [] Other:

Development Type:

[] Residential: Units Acres
[] Office: Sq.ft. Acres Employees
[] Commercial: Sq.ft. Acres Employees
[] Industrial: Sq.ft. Acres Employees
[] Educational:
[] Recreational:
[] Water Facilities: Type Flood Control MGD
[] Transportation: Type
[] Mining: Mineral
[] Power: Type MW
[] Waste Treatment: Type MGD
[] Hazardous Waste: Type
[] Other:

Project Issues Discussed in Document:

[X] Aesthetic/Visual [] Fiscal [X] Recreation/Parks [X] Vegetation
[X] Agricultural Land [X] Flood Plain/Flooding [X] Schools/Universities [X] Water Quality
[X] Air Quality [] Forest Land/Fire Hazard [X] Septic Systems [X] Water Supply/Groundwater
[X] Archeological/Historical [X] Geologic/Seismic [] Sewer Capacity [] Wetland/Riparian
[X] Biological Resources [X] Minerals [] Soil Erosion/Compaction/Grading [] Growth Inducement
[] Coastal Zone [X] Noise [X] Solid Waste [X] Land Use
[X] Drainage/Absorption [X] Population/Housing Balance [X] Toxic/Hazardous [] Cumulative Effects
[] Economic/Jobs [X] Public Services/Facilities [X] Traffic/Circulation [] Other:

Present Land Use/Zoning/General Plan Designation:

Flood Control facilities
Project Description: (please use a separate page if necessary)
The Ventura County Watershed Protection District is proposing to reduce the risk of flooding in the community of Casitas Springs through the construction of a new bypass storm drain facility to transport floodwaters, sediment, and debris from Fresno Canyon to the Ventura River. The project is anticipated to start construction in 2015 and will take about eight months to complete.

Note: The State Clearinghouse will assign identification numbers for all new projects. If a SCH number already exists for a project (e.g. Notice of Preparation or previous draft document) please fill in. Revised 2010

Resources Agency

- Resources Agency
Nadell Gayou
- Dept. of Boating & Waterways
Nicole Wong
- California Coastal Commission
Elizabeth A. Fuchs
- Colorado River Board
Gerald R. Zimmeiman
- Dept. of Conservation
Elizabeth Carpenter
- California Energy Commission
Eric Knight
- Cal Fire
Dan Foster
- Central Valley Flood Protection Board
James Herola
- Office of Historic Preservation
Ron Parsons
- Dept of Parks & Recreation Environmental Stewardship Section
- California Department of Resources, Recycling & Recovery
Sue O'Leary
- S.F. Bay Conservation & Dev't. Comm.
Steve McAdam
- Dept. of Water Resources Agency
Nadell Gayou

Fish and Game

- Dept. of Fish & Wildlife
Scott Flint
- Environmental Services Division
- Fish & Wildlife Region 1
Donald Koch
- Fish & Wildlife Region 1E
Laurie Harnsberger
- Fish & Wildlife Region 2
Jeff Drongesen
- Fish & Wildlife Region 3
Charles Armor
- Fish & Wildlife Region 4
Julie Vance
- Fish & Wildlife Region 5
Leslie Newton-Reed
- Fish & Wildlife Region 6
Gabrina Gatchel
- Fish & Wildlife Region 6 I/M
Brad Henderson
- Dept. of Fish & Wildlife M
George Isaac

Other Departments

- Food & Agriculture
Sandra Schubert
- Dept. of General Services
Anna Garbell
- Dept. of Public Health
Jeffery Worth
- Delta Stewardship Council
Kevan Samsam
- Dept. of Health/Drinking Water
- Public School Construction
- Environmental Services Section
- Dept. of Health/Drinking Water
- Delta Stewardship Council
Kevan Samsam
- Independent Commissions/Boards
- Delta Protection Commission
Michael Machado
- Cal EMA (Emergency Management Agency)
Dennis Castrillo

- Native American Heritage Comm.
Debbie Treadway
- Public Utilities Commission
Leo Wong
- Santa Monica Bay Restoration
Guangyu Wang
- State Lands Commission
Jennifer Deleong
- Tahoe Regional Planning Agency (TRPA)
Cherry Jacques

Business, Trans & Housing

- Caltrans - Division of Aeronautics
Philip Crimmins
- Caltrans - Planning
Terri Pencovic
- California Highway Patrol
Suzann Ikeuchi
- Office of Special Projects
- Housing & Community Development
CEQA Coordinator
- Housing Policy Division

Dept. of Transportation

- Caltrans, District 1
Rex Jackman
- Caltrans, District 2
Marcelino Gonzalez
- Caltrans, District 3
Gaty Arnold
- Caltrans, District 4
Erik Alm
- Caltrans, District 5
David Murray
- Caltrans, District 6
Michael Navarro
- Caltrans, District 7
Dianna Watson

- Caltrans, District 8
Dan Kopulsky
- Caltrans, District 9
Gayle Rosander
- Caltrans, District 10
Tom Dumas
- Caltrans, District 11
Jacob Armstrong
- Caltrans, District 12
Marlon Regisford

Cal EPA

- Air Resources Board
Airport/Energy Projects
Jim Lerner
- Transportation Projects
Douglas Ito
- Industrial Projects
Mike Tollstrup

- State Water Resources Control Board
Regional Programs Unit
Division of Financial Assistance

- State Water Resources Control Board
Student Intern, 401 Water Quality Certification Unit
Division of Water Quality

- State Water Resources Control Board
Phil Crader
Division of Water Rights
- Dept. of Toxic Substances Control
CEQA Tracking Center
- Department of Pesticide Regulation
CEQA Coordinator

Regional Water Quality Control Board (RWQCB)

- RWQCB 1
Cathleen Hudson
North Coast Region (1)
- RWQCB 2
Environmental Document Coordinator
San Francisco Bay Region (2)
- RWQCB 3
Central Coast Region (3)
- RWQCB 4
Teresa Rodgers
Los Angeles Region (4)
- RWQCB 5S
Central Valley Region (5)
- RWQCB 5F
Central Valley Region (5)
Fresno Branch Office
- RWQCB 5R
Central Valley Region (5)
Redding Branch Office
- RWQCB 6
Lahontan Region (6)
- RWQCB 6V
Lahontan Region (6)
Victorville Branch Office
- RWQCB 7
Colorado River Basin Region (7)
- RWQCB 8
Santa Ana Region (8)
- RWQCB 9
San Diego Region (9)
- Other
- Conservancy

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U.S. Department of Homeland Security
FEMA Region IX
1111 Broadway, Suite 1200
Oakland, CA. 94607-4052

WATERSHED PROTECTION DIST.



March 29, 2013

Elizabeth Martinez, Environmental Planner
Ventura County Watershed Protection District
800 South Victoria Avenue
Ventura, California 93009-1610

Dear Ms. Martinez:

This is in response to your request for comments on the Notice of Preparation and Notice of Public Scoping Meeting regarding the Fresno Canyon Flood Mitigation Project, Ventura County Watershed Protection District project in the community of Casitas Springs, 5 miles north of the City of San Buenaventura, in unincorporated Ventura County, California.

Please review the current effective countywide Flood Insurance Rate Maps (FIRMs) for the County of Ventura (Community Number 060413) and City of San Buenaventura (Community Number 060419), Maps revised January 20, 2010. Please note that the City of San Buenaventura, Ventura County, California is a participant in the National Flood Insurance Program (NFIP). The minimum, basic NFIP floodplain management building requirements are described in Vol. 44 Code of Federal Regulations (44 CFR), Sections 59 through 65.

A summary of these NFIP floodplain management building requirements are as follows:

- All buildings constructed within a riverine floodplain, (i.e., Flood Zones A, AO, AH, AE, and A1 through A30 as delineated on the FIRM), must be elevated so that the lowest floor is at or above the Base Flood Elevation level in accordance with the effective Flood Insurance Rate Map.
- If the area of construction is located within a Regulatory Floodway as delineated on the FIRM, any *development* must not increase base flood elevation levels. **The term *development* means any man-made change to improved or unimproved real estate, including but not limited to buildings, other structures, mining, dredging, filling, grading, paving, excavation or drilling operations, and storage of equipment or materials.** A hydrologic and hydraulic analysis must be performed *prior* to the start of development, and must demonstrate that the development would not cause any rise in base flood levels. No rise is permitted within regulatory floodways.

Elizabeth Martinez, Environmental Planner

Page 2

March 29, 2013

- All buildings constructed within a coastal high hazard area, (any of the "V" Flood Zones as delineated on the FIRM), must be elevated on pilings and columns, so that the lowest horizontal structural member, (excluding the pilings and columns), is elevated to or above the base flood elevation level. In addition, the posts and pilings foundation and the structure attached thereto, is anchored to resist flotation, collapse and lateral movement due to the effects of wind and water loads acting simultaneously on all building components.
- Upon completion of any development that changes existing Special Flood Hazard Areas, the NFIP directs all participating communities to submit the appropriate hydrologic and hydraulic data to FEMA for a FIRM revision. In accordance with 44 CFR, Section 65.3, as soon as practicable, but not later than six months after such data becomes available, a community shall notify FEMA of the changes by submitting technical data for a flood map revision. To obtain copies of FEMA's Flood Map Revision Application Packages, please refer to the FEMA website at <http://www.fema.gov/business/nfip/forms.shtm>.

Please Note:

Many NFIP participating communities have adopted floodplain management building requirements which are more restrictive than the minimum federal standards described in 44 CFR. Please contact the local community's floodplain manager for more information on local floodplain management building requirements. The San Buenaventura floodplain manager can be reached by calling Rick Cole, City Manager, at (805) 654-7740. The Ventura County floodplain manager can be reached by calling Jeff Pratt, Director, Department of Public Works, at (805) 654-2073.

If you have any questions or concerns, please do not hesitate to call Frank Mansell of the Mitigation staff at (510) 627-7191.

Sincerely,



Gregor Blackburn, CFM, Branch Chief
Floodplain Management and Insurance Branch

cc:

Rick Cole, City Manager, City of San Buenaventura

Jeff Pratt, Director, Public Works Agency, Ventura County

Garret Tam Sing/Salomon Miranda, State of California, Department of Water Resources,
Southern Region Office

Frank Mansell, NFIP Planner, DHS/FEMA Region IX

Alessandro Amaglio, Environmental Officer, DHS/FEMA Region IX

NATIVE AMERICAN HERITAGE COMMISSION

915 CAPITOL MALL, ROOM 364
SACRAMENTO, CA 95814
(916) 653-6251
(916) 657-5390 - FAX

March 29, 2013

Ms. Elizabeth Martinez

Ventura County Watershed Protection District

800 S. Victoria Avenue
Ventura, CA 93009-1600

RE: SCH# 2013031072 CEQA Notice of Preparation (NOP); draft Environmental Impact Report (DEIR) – “**Fresno Canyon Flood Mitigation Project (to Reduce the Risk of Flooding in the Community of Casitas Springs)**,” located five miles north of the City of San Buenaventura; Ventura County, California

Dear Ms. Martinez:

The Native American Heritage Commission (NAHC) has reviewed the CEQA Notice regarding the above referenced project. In the 1985 Appellate Court decision (170 Cal App 3rd 604), the court held that the NAHC has jurisdiction and special expertise, as a state agency, over affected Native American resources impacted by proposed projects, including archaeological places of religious significance to Native Americans, and to Native American burial sites.

The California Environmental Quality Act (CEQA) states that any project that causes a substantial adverse change in the significance of an historical resources, which includes archeological resources, is a significant effect requiring the preparation of an EIR (CEQA guidelines 15064(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 resources, which we know that it has. The NAHC recommends that known cultural resources recorded on or adjacent to the APE be listed in the draft Environmental Impact Report.

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 measurers 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. Contact has been made to the Native American Heritage Commission for :a Sacred

WATERSHED PROTECTION DIST.

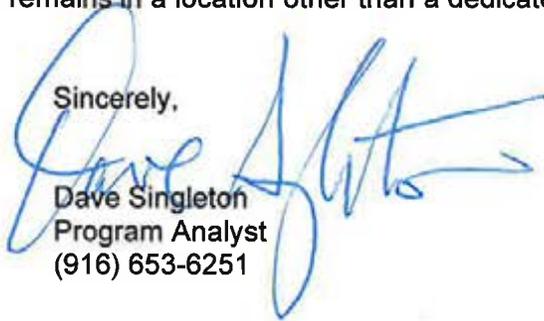
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Lands File Check. A list of appropriate Native American Contacts for consultation concerning the project site has been provided and is attached to this letter to determine if the proposed active might impinge on any cultural resources. Lack of surface 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, per 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. Lead agencies should include in their mitigation plan provisions for the 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
(916) 653-6251

CC: State Clearinghouse

Attachment: Native American Contacts list

**Native American Contacts
Ventura County
March 29, 2013**

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

Chumash
Tataviam
Ferrnandeño

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
Ronnie Salas, Cultural Preservation Department
1019 - 2nd Street, Suite #1
San Fernando CA 91340
rortega@tataviam-nsn.gov
(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.

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed DSCH#2013031072; CEQA Notice of Preparation (NOP); draft Environmental Impact Report (DEIR) for the Fresno Canyon Flood Mitigation Project; located near the Community of Casitas Springs; Ventura County, California.

**Native American Contacts
Ventura County
March 29, 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
6471 Cornell Circle Chumash
Moorpark , CA 93021 Fernandefio
ndnRandy@yahoo.com Tataviam
(805) 905-1675 - cell Shoshone Paiute
Yaqui

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

Coastal Band of the Chumash Nation
Toni Cordero, Chairwoman
P.O. Box 4464 Chumash
Santa Barbara CA 93140
cordero44@charter.net
805-964-3447

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
805-617-6884
805-893-1459
ksen_sku_mu@yahoo.com

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

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This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed DSCH#2013031072; CEQA Notice of Preparation (NOP); draft Environmental Impact Report (DEIR) for the Fresno Canyon Flood Mitigation Project; located near the Community of Casitas Springs; Ventura County, California.

**Native American Contacts
Ventura County
March 29, 2013**

Santa Ynez Tribal Elders Council
Freddie Romero, Cultural Preservation Consint
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 4464 Chumash
Santa Barbara CA 93140
805-689-9528

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

Coastal Band of the Chumash Nation
Michael Cordero
5246 El Carro Lane Chumash
Carpinteria , CA 93013
805-684-8281

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.

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.

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed DSCH#2013031072; CEQA Notice of Preparation (NOP); draft Environmental Impact Report (DEIR) for the Fresno Canyon Flood Mitigation Project; located near the Community of Casitas Springs; Ventura County, California.



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



April 26, 2013

Ms. Elizabeth Martinez
Ventura County Watershed Protection District
800 S. Victoria Avenue
Ventura, California, 93009-1610
Elizabeth.Martinez@ventura.org

Subject: Notice of Preparation of an Environmental Impact Report for the Fresno Canyon Flood Mitigation Project, SCH 2013031072, Ventura County (SCH# 2013031072)

Dear Ms. Martinez:

The California Department of Fish and Wildlife (Department) has reviewed the Initial Study (IS) and Notice of Preparation of a Draft Environmental Impact Report (DEIR) prepared by the Ventura County Watershed Protection District (District) for the Fresno Canyon Flood Mitigation Project. On April 23, 2013 the Department requested an extension to the comment period from Ms. Elizabeth Martinez who agreed to extend the comment period from April 24, 2013 to April 26, 2013. The Department appreciates the District's accommodation. The proposed project is for the construction of a bypass storm drain facility to transport floodwaters, sediment, and debris from Fresno Canyon to the Ventura River to reduce the risk of flooding in the community of Casitas Springs.

The following statements and comments have been prepared pursuant to the Department's authority as Trustee Agency with jurisdiction over natural resources affected by the project (California Environmental Quality Act, [CEQA] Guidelines §15386) and pursuant to our authority as a Responsible Agency under CEQA Guidelines section 15381 over those aspects of the proposed project that come under the purview of the California Endangered Species Act (Fish and Game Code §2050 *et seq.*) and Fish and Game Code section 1600 *et seq.*

The California Wildlife Action Plan (<http://www.dfg.ca.gov/SWAP/>), 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. With these stressors in mind, the Department looks forward to working with the District in recommending conservation and protective measures for biological and botanical resources.

To enable Department staff to adequately review and comment on the proposed project we recommend 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 accounting for seasonal variations affecting species' use within the project area should also be addressed.
 - c. Recent, 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.
 - d. Endangered, rare, and threatened species addressed in the DEIR should include all those species which meet the related definition under the CEQA Guidelines (See Cal. Code Regs., tit. 14, § 15380).
 - e. The Department's Biogeographic Data Branch in Sacramento should be contacted at (916) 322-2493 (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 must be addressed.
2. A thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with enforceable measures to offset such impacts. This discussion should focus on maximizing avoidance, and minimizing impacts. The Department recommends the DEIR includes a discussion which, at a minimum, addresses the following:
- a. 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.
 - b. 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.
 - 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 and 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. Section 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.
 - e. Impacts from project activities (including but not limited to, staging and disturbances to native and non-native vegetation, structures, and substrates) should occur outside of the

- avian breeding season which generally runs from March 1-August 31 (as early as January 1 for some raptors) to avoid take of birds or their eggs. If project activities cannot avoid the avian breeding season, nest surveys should be conducted and active nests should be avoided and provided with a minimum buffer as determined by an avian biologist (the Department generally recommends a minimum 300 foot nest avoidance buffer or 500 feet for all active raptor nests).
- f. Proposed impacts to all habitats within the County of Ventura required Fuel Modification Zones (FMZ). Areas identified in the DEIR as mitigation for loss of habitat should be located outside of any FMZ.
 - g. Impacts from project activities to bats which may result in injury or death. Bats may reside within trees or man made structures that may be impacted during project implementation.
 1. To avoid the direct loss of bats that could result from removal of trees and/or structures that may provide maternity roost habitat (e.g., in cavities or under loose bark), the following steps would be taken:
 - To the extent feasible, tree removal or relocation would be scheduled between October 1 and February 28, outside of the maternity roosting season.
 - If trees and/or structures must be removed during the maternity season (March 1 to September 30), a qualified bat specialist should conduct a pre-construction survey to identify those trees and/or structures proposed for disturbance that could provide hibernacula or nursery colony roosting habitat for bats.
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/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.
4. An Incidental Take Permit (ITP) from the Department may be necessary if at anytime during the life of the project, project construction, or any project related activity will result in "take" as defined by the Fish and Game Code of any species protected by CESA. (Fish & G. Code, §§86, 2080, 2081, subd. (b), (c).) Early consultation with Department regarding potential permitting obligations under CESA with respect to the project is encouraged. (Cal. Code Regs., tit. 14, § 783.2, subd. (b).) It is imperative with these potential permitting obligations that the DEIR prepared by the Lead Agency includes a thorough and robust analysis of the potentially significant impacts to endangered, rare, and threatened species, and their habitat, that may occur as a result of the proposed project. For any such potentially significant impacts, the Lead Agency should also analyze and describe specific, potentially feasible mitigation measures to avoid or substantially lessen any such impacts as required by CEQA and, if an ITP is necessary, as required by the relevant permitting criteria prescribed by Fish and Game Code section 2081, subdivisions (b) and (c). The failure to

include this analysis in an environmental document could preclude the Department from relying on the Lead Agency's analysis to issue an ITP without the Department first conducting its own, subsequent or supplemental analysis for the project as a separate Lead Agency. (See, e.g., Cal. Code Regs., tit. 14, § 15096, subd. (f).)

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, should 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 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) of 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 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. 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 document could preclude the Department from relying on the Lead Agency's analysis to issue a LSA Agreement without the Department first conducting its own, subsequent or supplemental analysis for the project as a separate Lead Agency.

Thank you for this opportunity to provide comments. Please contact Mr. Daniel Blankenship, Staff Environmental Scientist at (661) 259-3750 if you should have any questions and for further coordination on the proposed project.

Sincerely,



Betty Courtney
Environmental Program Manager
South Coast Region

cc: Ms. Mary Meyer, CDFW, Ojai
Mr. Martin Potter, CDFW, Ojai
Mr. Eric Weiss, CDFW, San Diego
Ms. Natasha Lohmus, CDFW, Carpinteria
State Clearinghouse, Sacramento

From: Tom Wolfington
To: Karen Martia
CC: Brian Trushinski; Elizabeth Martinez; Sergio Vargas
Date: 3/27/2013 8:57 AM
Subject: Public Scoping Meeting 4-8-2013, Fresno Canyon Flood Mitigation Project Initial Study, FC081182
Attachments: FC081182.PR.Fresno Cyn Flood Mitigation.02.15.2013.pdf

Karen,

It appears that my comments (basically administrative in nature) made February 15, 2013 have been incorporated into the revised MND contained in the CD. I do not plan to make additional comments at this point. I do not plan to attend the Public Scoping Meeting.

Thanks for bringing this to my attention for a quick look.

Tom

From: Jim O'Tousa
To: Elizabeth Martinez
Date: 4/16/2013 9:42 AM
Subject: Comment for Fresno Canyon Flood Mitigation Project

Elizabeth,

The following is my comments pertaining to the N.O.P. for Fresno Canyon:

Under Landslides:

C.14, page C-29. A discussion needs to be added about the mapped possible landslide in the area as shown on Plate 5 of the CDMG (now CGS) Preliminary Report 14, dated 1973 on file with County of Ventura.

Also, there needs to be a discussion about the load carrying capacity of the proposed project with respect to debris flows and not just debris flooding.

Thanks!

Jim O'Tousa CEG
Engineering Manager II
Ventura County Public Works Agency
Development and Inspection Services
PH 805 654-2034 Fax 805 477-7241
<http://onestoppermit.ventura.org/>

VENTURA COUNTY
AIR POLLUTION CONTROL DISTRICT
Memorandum

TO: Elizabeth Martinez, Environmental Planner,
Watershed Protection District

DATE: April 22, 2013

FROM: Alicia Stratton

SUBJECT: Request for Review of the Fresno Canyon Flood Mitigation Project Initial Study

Air Pollution Control District staff has reviewed the second circulation of the project initial study, which is a proposal for construction of a bypass storm drain facility to transport floodwaters, sediment, and debris from Fresno Canyon to the Ventura River to reduce the risk of flooding in the community of Casitas Springs. Fresno Canyon is a tributary to the Ventura River with a drainage area of 1,100 acres. The facility will be designed to convey the fully bulked flows resulting from a 100-year flood event. The two alternatives proposed include a 12-ft. wide rectangular conveyance channel with box culverts under Highway 33 and the Ojai Valley Trail using an open trench method and a 12-ft. diameter reinforced concrete conveyance pipe installed by horizontal boring beneath Highway 33 and open trench method for the remaining 395 ft. The project location is in the community of Casitas Springs, one mile south of Oak View and five miles north of Ventura.

Similar to the previously circulated initial study, Section C1 addresses air quality issues pertaining to the project. We concur with the findings of this discussion that significant operational, long-term air quality impacts will not result from the project. Short-term, local air quality impacts are addressed in Section C.1E. This discussion indicates that short-term air quality impacts will result from construction activities. Because the project site is in close proximity to single family residential units, we concur with the use of an appropriate air quality model to calculate the amount of construction emissions and determine significance, as discussed on Page C-10. All emissions from construction activities should be evaluated in the DEIR.

Although this is not a CEQA issue, the project may be subject to the requirements of the federal General Conformity regulation. We recommend that conformity is evaluated in the DEIR. Conformity is defined in the Clean Air Act as conformity to an air quality implementation plan's purpose of eliminating or reducing the severity and number of

violations of the national ambient air quality standards, exacerbate existing violations, or interfere with timely attainment or required interim emission reductions towards attainment. Section 176(c) of the Clean Air Act requires the EPA to develop criteria and procedures for determining the conformity of transportation and nontransportation (general) projects that require federal agency approval or funding with the applicable air quality plan. We recommend that the air quality assessment include a summary of the federal general conformity rule, which actions(s) related to the project may require a conformity analysis to be performed, and which agencies will likely be involved with the conformity determination(s).

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

From: Theresa Lubin
To: Elizabeth Martinez
Date: 4/23/2013 12:19 PM
Subject: Fresno Canyon Flood Mitigation Project

Hi Elizabeth,

Thank you for providing a copy of the NOP for the above project. It looks complete from our area of review. Our only concern would be the potential temporary impact to the Ojai Valley Trail (thank you for including it) which will be addressed in the Draft EIR.

Take care,
Theresa

APPENDIX B

Air Emission Calculations

Fresno Canyon
Ventura County, Summer

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
User Defined Industrial	1,000.00	User Defined Unit	1.00	45,000.00	0

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	2.6	Precipitation Freq (Days)	31
Climate Zone	9			Operational Year	2016
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	630.89	CH4 Intensity (lb/MWhr)	0.029	N2O Intensity (lb/MWhr)	0.006

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - Pipe and open trench flood control project. Approximately 1,000 feet in length. Assume site approximately 1 acre.

Construction Phase - Schedule provided by contractor.

Off-road Equipment - Equipment list provided by developer.

Construction Off-road Equipment Mitigation - Assume watering of construction areas.

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tblConstructionPhase	PhaseStartDate	8/1/2015	8/3/2015
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tblOffRoadEquipment	OffRoadEquipmentType		Off-Highway Trucks

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tblOffRoadEquipment	OffRoadEquipmentType	Cranes
tblOffRoadEquipment	OffRoadEquipmentType	Tractors/Loaders/Backhoes
tblOffRoadEquipment	OffRoadEquipmentType	Excavators
tblOffRoadEquipment	OffRoadEquipmentType	Off-Highway Trucks
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tblOffRoadEquipment	OffRoadEquipmentType	Cranes
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tblOffRoadEquipment	OffRoadEquipmentType	Excavators
tblOffRoadEquipment	OffRoadEquipmentType	Off-Highway Trucks
tblOffRoadEquipment	OffRoadEquipmentType	Welders
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tblOffRoadEquipment	OffRoadEquipmentType	Excavators
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tblOffRoadEquipment	OffRoadEquipmentType	Excavators
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tblOffRoadEquipment	OffRoadEquipmentType	Cranes
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tbloffRoadEquipment	PhaseName	Access road
tbloffRoadEquipment	PhaseName	Access road

tblOffRoadEquipment	PhaseName		CMB access road
tblOffRoadEquipment	PhaseName		CMB access road
tblOffRoadEquipment	PhaseName		CMB access road
tblOffRoadEquipment	PhaseName		CMB access road
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tblOffRoadEquipment	PhaseName		AC access road pavement
tblOffRoadEquipment	PhaseName		AC access road pavement
tblOffRoadEquipment	PhaseName		Fence and gate
tblProjectCharacteristics	OperationalYear	2014	2016

2.0 Emissions Summary

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2015	7.5912	88.2500	43.0312	0.0906	0.0000	3.9392	3.9392	0.0000	3.6248	3.6248	0.0000	9,491.7437	9,491.7437	2.8270	0.0000	9,551.1101
Total	7.5912	88.2500	43.0312	0.0906	0.0000	3.9392	3.9392	0.0000	3.6248	3.6248	0.0000	9,491.7437	9,491.7437	2.8270	0.0000	9,551.1101

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2015	7.5842	25.4986	42.9918	0.0905	0.0000	3.9355	3.9355	0.0000	3.6215	3.6215	0.0000	9,483.0356	9,483.0356	2.8244	0.0000	9,542.3474
Total	7.5842	25.4986	42.9918	0.0905	0.0000	3.9355	3.9355	0.0000	3.6215	3.6215	0.0000	9,483.0356	9,483.0356	2.8244	0.0000	9,542.3474

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.0918	71.1064	0.0917	0.0883	0.0000	0.0916	0.0916	0.0000	0.0919	0.0919	0.0000	0.0917	0.0917	0.0920	0.0000	0.0917

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	1.2589	1.0000e-003	0.1047	1.0000e-005		3.8000e-004	3.8000e-004		3.8000e-004	3.8000e-004		0.2189	0.2189	6.2000e-004		0.2319
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Total	1.2589	1.0000e-003	0.1047	1.0000e-005	0.0000	3.8000e-004	3.8000e-004	0.0000	3.8000e-004	3.8000e-004		0.2189	0.2189	6.2000e-004	0.0000	0.2319

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	1.2589	1.0000e-003	0.1047	1.0000e-005		3.8000e-004	3.8000e-004		3.8000e-004	3.8000e-004		0.2189	0.2189	6.2000e-004		0.2319
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Total	1.2589	1.0000e-003	0.1047	1.0000e-005	0.0000	3.8000e-004	3.8000e-004	0.0000	3.8000e-004	3.8000e-004		0.2189	0.2189	6.2000e-004	0.0000	0.2319

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Jacking and receiving pits	Grading	4/8/2015	4/14/2015	5	5	
2	RC pipe installation	Grading	4/15/2015	5/14/2015	5	22	
3	Removal of existing facilities	Demolition	4/22/2015	4/28/2015	5	5	
4	Sewer line relocation	Trenching	4/28/2015	6/1/2015	5	25	
5	RC pipe open trench	Trenching	5/29/2015	7/2/2015	5	25	
6	Inlet structure	Building Construction	7/3/2015	7/31/2015	5	21	
7	Floodwall and foundation	Building Construction	8/3/2015	8/28/2015	5	20	
8	Retaining wall north	Building Construction	8/19/2015	9/15/2015	5	20	
9	Retaining wall at Edison	Building Construction	9/16/2015	9/22/2015	5	5	
10	Retaining wall at bike path	Building Construction	9/23/2015	10/6/2015	5	10	
11	Outlet structure rock	Building Construction	10/7/2015	10/20/2015	5	10	
12	RCP drain connections	Building Construction	10/21/2015	10/23/2015	5	3	
13	Bike path	Building Construction	10/26/2015	10/28/2015	5	3	
14	Access road	Building Construction	10/29/2015	10/30/2015	5	2	
15	CMB access road	Building Construction	11/2/2015	11/4/2015	5	3	
16	AC access road pavement	Paving	11/5/2015	11/9/2015	5	3	
17	Fence and gate	Building Construction	11/10/2015	11/16/2015	5	5	

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Jacking and receiving pits	Excavators	1	8.00	162	0.38
Jacking and receiving pits	Off-Highway Trucks	1	8.00	400	0.38
Jacking and receiving pits	Tractors/Loaders/Backhoes	1	8.00	97	0.37
RC pipe installation	Cranes	1	6.00	226	0.29
RC pipe installation	Tractors/Loaders/Backhoes	2	8.00	97	0.37
RC pipe installation	Excavators	1	8.00	162	0.38
RC pipe installation	Off-Highway Trucks	1	8.00	400	0.38
RC pipe installation	Welders	1	8.00	46	0.45
Removal of existing facilities	Off-Highway Trucks	1	8.00	400	0.38
Removal of existing facilities	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Sewer line relocation	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Sewer line relocation	Excavators	1	8.00	162	0.38
Sewer line relocation	Plate Compactors	1	8.00	8	0.43
RC pipe open trench	Cranes	1	6.00	226	0.29
RC pipe open trench	Tractors/Loaders/Backhoes	1	8.00	97	0.37
RC pipe open trench	Excavators	1	8.00	162	0.38
RC pipe open trench	Off-Highway Trucks	1	8.00	400	0.38
RC pipe open trench	Welders	1	8.00	46	0.45
Inlet structure	Off-Highway Trucks	3	8.00	400	0.38
Inlet structure	Excavators	1	8.00	162	0.38
Inlet structure	Plate Compactors	1	8.00	16	0.38
Floodwall and foundation	Excavators	1	8.00	162	0.38
Floodwall and foundation	Off-Highway Trucks	3	8.00	400	0.38
Floodwall and foundation	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Floodwall and foundation	Plate Compactors	1	8.00	8	0.43
Retaining wall north	Bore/Drill Rigs	1	8.00	205	0.50
Retaining wall north	Cranes	2	6.00	226	0.29

Retaining wall north	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Retaining wall north	Excavators	1	8.00	162	0.38
Retaining wall north	Off-Highway Trucks	1	8.00	400	0.38
Retaining wall at Edison	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Retaining wall at Edison	Excavators	1	8.00	162	0.38
Retaining wall at Edison	Cranes	1	6.00	226	0.29
Retaining wall at Edison	Off-Highway Trucks	1	8.00	400	0.38
Retaining wall at bike path	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Retaining wall at bike path	Excavators	1	8.00	162	0.38
Retaining wall at bike path	Off-Highway Trucks	2	8.00	400	0.38
Retaining wall at bike path	Forklifts	1	8.00	89	0.20
Outlet structure rock	Excavators	1	8.00	162	0.38
Outlet structure rock	Off-Highway Trucks	1	8.00	400	0.38
RCP drain connections	Tractors/Loaders/Backhoes	2	8.00	97	0.37
RCP drain connections	Excavators	1	8.00	162	0.38
RCP drain connections	Plate Compactors	1	8.00	8	0.43
Bike path	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Bike path	Excavators	1	8.00	162	0.38
Bike path	Off-Highway Trucks	1	8.00	400	0.38
Bike path	Rollers	1	8.00	80	0.38
Bike path	Graders	1	8.00	174	0.41
Access road	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Access road	Excavators	1	8.00	162	0.38
Access road	Off-Highway Trucks	1	8.00	400	0.38
CMB access road	Tractors/Loaders/Backhoes	2	8.00	97	0.37
CMB access road	Excavators	1	8.00	162	0.38
CMB access road	Off-Highway Trucks	1	8.00	400	0.38
CMB access road	Rollers	1	8.00	80	0.38

CMB access road	Graders	1	8.00	174	0.41
AC access road pavement	Rollers	1	8.00	80	0.38
AC access road pavement	Graders	1	8.00	174	0.41
Fence and gate	Off-Highway Trucks	1	8.00	400	0.38

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
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3.1 Mitigation Measures Construction

Water Exposed Area

Clean Paved Roads

3.2 Jacking and receiving pits - 2015

Unmitigated Construction On-Site

Acres of Grading: 0

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.8076	20.4356	11.3248	0.0216		0.9724	0.9724		0.8946	0.8946		2,265.9227	2,265.9227	0.6765		2,280.1286
Total	1.8076	20.4356	11.3248	0.0216		0.9724	0.9724		0.8946	0.8946		2,265.9227	2,265.9227	0.6765		2,280.1286

3.2 Jacking and receiving pits - 2015

Mitigated Construction On-Site

Acres of Grading: 0

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.8060	3.4290	11.3145	0.0216		0.9715	0.9715		0.8938	0.8938	0.0000	2,263.8438	2,263.8438	0.6759		2,278.0367
Total	1.8060	3.4290	11.3145	0.0216		0.9715	0.9715		0.8938	0.8938	0.0000	2,263.8438	2,263.8438	0.6759		2,278.0367

3.3 RC pipe installation - 2015

Unmitigated Construction On-Site

Acres of Grading: 0

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	3.3515	32.3558	18.0911	0.0315		1.6991	1.6991		1.5757	1.5757		3,249.2796	3,249.2796	0.9643		3,269.5305
Total	3.3515	32.3558	18.0911	0.0315		1.6991	1.6991		1.5757	1.5757		3,249.2796	3,249.2796	0.9643		3,269.5305

3.3 RC pipe installation - 2015

Mitigated Construction On-Site

Acres of Grading: 0

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	3.3485	15.2533	18.0745	0.0315		1.6975	1.6975		1.5742	1.5742	0.0000	3,246.2986	3,246.2986	0.9634		3,266.5309
Total	3.3485	15.2533	18.0745	0.0315		1.6975	1.6975		1.5742	1.5742	0.0000	3,246.2986	3,246.2986	0.9634		3,266.5309

3.4 Removal of existing facilities - 2015

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.3948	15.6175	7.9031	0.0164		0.7335	0.7335		0.6748	0.6748		1,715.9543	1,715.9543	0.5123		1,726.7123
Total	1.3948	15.6175	7.9031	0.0164		0.7335	0.7335		0.6748	0.6748		1,715.9543	1,715.9543	0.5123		1,726.7123

3.4 Removal of existing facilities - 2015

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.3935	3.4151	7.8959	0.0163		0.7329	0.7329		0.6742	0.6742	0.0000	1,714.3800	1,714.3800	0.5118		1,725.1281
Total	1.3935	3.4151	7.8959	0.0163		0.7329	0.7329		0.6742	0.6742	0.0000	1,714.3800	1,714.3800	0.5118		1,725.1281

3.5 Sewer line relocation - 2015

Unmitigated Construction On-Site

Acres of Paving: 0

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.1766	11.9769	8.4984	0.0120		0.7862	0.7862		0.7241	0.7241		1,245.1322	1,245.1322	0.3650		1,252.7974
Total	1.1766	11.9769	8.4984	0.0120		0.7862	0.7862		0.7241	0.7241		1,245.1322	1,245.1322	0.3650		1,252.7974

3.5 Sewer line relocation - 2015

Mitigated Construction On-Site

Acres of Paving: 0

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.1755	6.8302	8.4906	0.0120		0.7855	0.7855		0.7234	0.7234	0.0000	1,243.9899	1,243.9899	0.3647		1,251.6481
Total	1.1755	6.8302	8.4906	0.0120		0.7855	0.7855		0.7234	0.7234	0.0000	1,243.9899	1,243.9899	0.3647		1,251.6481

3.6 RC pipe open trench - 2015

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.9926	28.9376	15.6753	0.0284		1.4315	1.4315		1.3295	1.3295		2,923.1196	2,923.1196	0.8670		2,941.3257
Total	2.9926	28.9376	15.6753	0.0284		1.4315	1.4315		1.3295	1.3295		2,923.1196	2,923.1196	0.8670		2,941.3257

3.6 RC pipe open trench - 2015

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.9899	11.8382	15.6610	0.0284		1.4302	1.4302		1.3283	1.3283	0.0000	2,920.4378	2,920.4378	0.8662		2,938.6272
Total	2.9899	11.8382	15.6610	0.0284		1.4302	1.4302		1.3283	1.3283	0.0000	2,920.4378	2,920.4378	0.8662		2,938.6272

3.7 Inlet structure - 2015

Unmitigated Construction On-Site

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	3.5262	41.4871	19.9184	0.0450		1.6392	1.6392		1.5081	1.5081		4,727.7159	4,727.7159	1.4114		4,757.3557
Total	3.5262	41.4871	19.9184	0.0450		1.6392	1.6392		1.5081	1.5081		4,727.7159	4,727.7159	1.4114		4,757.3557

3.7 Inlet structure - 2015

Mitigated Construction On-Site

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	3.5230		19.9001	0.0450		1.6377	1.6377		1.5067	1.5067	0.0000	4,723.378 4	4,723.378 4	1.4101		4,752.991 1
Total	3.5230		19.9001	0.0450		1.6377	1.6377		1.5067	1.5067	0.0000	4,723.378 4	4,723.378 4	1.4101		4,752.991 1

3.8 Floodwall and foundation - 2015

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	3.9252	45.1566	22.5446	0.0486		1.9166	1.9166		1.7640	1.7640		5,088.355 2	5,088.355 2	1.5124		5,120.115 1
Total	3.9252	45.1566	22.5446	0.0486		1.9166	1.9166		1.7640	1.7640		5,088.355 2	5,088.355 2	1.5124		5,120.115 1

3.8 Floodwall and foundation - 2015

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	3.9216	3.4151	22.5240	0.0486		1.9148	1.9148		1.7624	1.7624	0.0000	5,083.6870	5,083.6870	1.5110		5,115.4176
Total	3.9216	3.4151	22.5240	0.0486		1.9148	1.9148		1.7624	1.7624	0.0000	5,083.6870	5,083.6870	1.5110		5,115.4176

3.9 Retaining wall north - 2015

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	3.6660	43.0934	20.4866	0.0419		2.0226	2.0226		1.8608	1.8608		4,403.3885	4,403.3885	1.3146		4,430.9950
Total	3.6660	43.0934	20.4866	0.0419		2.0226	2.0226		1.8608	1.8608		4,403.3885	4,403.3885	1.3146		4,430.9950

3.9 Retaining wall north - 2015

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	3.6626	19.9465	20.4678	0.0419		2.0207	2.0207		1.8591	1.8591	0.0000	4,399.3486	4,399.3486	1.3134		4,426.9298
Total	3.6626	19.9465	20.4678	0.0419		2.0207	2.0207		1.8591	1.8591	0.0000	4,399.3486	4,399.3486	1.3134		4,426.9298

3.10 Retaining wall at Edison - 2015

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.7254	30.4891	16.0605	0.0290		1.5421	1.5421		1.4187	1.4187		3,041.8015	3,041.8015	0.9081		3,060.8717
Total	2.7254	30.4891	16.0605	0.0290		1.5421	1.5421		1.4187	1.4187		3,041.8015	3,041.8015	0.9081		3,060.8717

3.10 Retaining wall at Edison - 2015

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.7229	13.3884	16.0458	0.0289		1.5406	1.5406		1.4174	1.4174	0.0000	3,039.0108	3,039.0108	0.9073		3,058.0635
Total	2.7229	13.3884	16.0458	0.0289		1.5406	1.5406		1.4174	1.4174	0.0000	3,039.0108	3,039.0108	0.9073		3,058.0635

3.11 Retaining wall at bike path - 2015

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	3.4506	38.2069	20.5447	0.0395		1.8833	1.8833		1.7326	1.7326		4,151.4101	4,151.4101	1.2394		4,177.4368
Total	3.4506	38.2069	20.5447	0.0395		1.8833	1.8833		1.7326	1.7326		4,151.4101	4,151.4101	1.2394		4,177.4368

3.11 Retaining wall at bike path - 2015

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	3.4475	8.9109	20.5258	0.0395		1.8816	1.8816		1.7311	1.7311	0.0000	4,147.6014	4,147.6014	1.2382		4,173.6043
Total	3.4475	8.9109	20.5258	0.0395		1.8816	1.8816		1.7311	1.7311	0.0000	4,147.6014	4,147.6014	1.2382		4,173.6043

3.12 Outlet structure rock - 2015

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.4545	17.0885	8.9437	0.0186		0.7073	0.7073		0.6507	0.6507		1,948.1272	1,948.1272	0.5816		1,960.3407
Total	1.4545	17.0885	8.9437	0.0186		0.7073	0.7073		0.6507	0.6507		1,948.1272	1,948.1272	0.5816		1,960.3407

3.12 Outlet structure rock - 2015**Mitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.4532		8.9355	0.0185		0.7066	0.7066		0.6501	0.6501	0.0000	1,946.3399	1,946.3399	0.5811		1,958.5422
Total	1.4532		8.9355	0.0185		0.7066	0.7066		0.6501	0.6501	0.0000	1,946.3399	1,946.3399	0.5811		1,958.5422

3.13 RCP drain connections - 2015**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.1766	11.9769	8.4984	0.0120		0.7862	0.7862		0.7241	0.7241		1,245.1322	1,245.1322	0.3650		1,252.7974
Total	1.1766	11.9769	8.4984	0.0120		0.7862	0.7862		0.7241	0.7241		1,245.1322	1,245.1322	0.3650		1,252.7974

3.13 RCP drain connections - 2015

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.1755	6.8302	8.4906	0.0120		0.7855	0.7855		0.7234	0.7234	0.0000	1,243.9899	1,243.9899	0.3647		1,251.6481
Total	1.1755	6.8302	8.4906	0.0120		0.7855	0.7855		0.7234	0.7234	0.0000	1,243.9899	1,243.9899	0.3647		1,251.6481

3.14 Bike path - 2015

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	3.5926	38.0784	20.7566	0.0336		2.0990	2.0990		1.9310	1.9310		3,527.2756	3,527.2756	1.0530		3,549.3895
Total	3.5926	38.0784	20.7566	0.0336		2.0990	2.0990		1.9310	1.9310		3,527.2756	3,527.2756	1.0530		3,549.3895

3.14 Bike path - 2015

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	3.5893	20.9707	20.7375	0.0336		2.0970	2.0970		1.9293	1.9293	0.0000	3,524.0396	3,524.0396	1.0521		3,546.1331
Total	3.5893	20.9707	20.7375	0.0336		2.0970	2.0970		1.9293	1.9293	0.0000	3,524.0396	3,524.0396	1.0521		3,546.1331

3.15 Access road - 2015

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.1723	23.9249	13.7753	0.0248		1.2424	1.2424		1.1430	1.1430		2,600.4472	2,600.4472	0.7763		2,616.7504
Total	2.1723	23.9249	13.7753	0.0248		1.2424	1.2424		1.1430	1.1430		2,600.4472	2,600.4472	0.7763		2,616.7504

3.15 Access road - 2015

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.1703	6.8302	13.7626	0.0248		1.2413	1.2413		1.1420	1.1420	0.0000	2,598.0614	2,598.0614	0.7756		2,614.3496
Total	2.1703	6.8302	13.7626	0.0248		1.2413	1.2413		1.1420	1.1420	0.0000	2,598.0614	2,598.0614	0.7756		2,614.3496

3.16 CMB access road - 2015

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	3.5926	38.0784	20.7566	0.0336		2.0990	2.0990		1.9310	1.9310		3,527.2756	3,527.2756	1.0530		3,549.3895
Total	3.5926	38.0784	20.7566	0.0336		2.0990	2.0990		1.9310	1.9310		3,527.2756	3,527.2756	1.0530		3,549.3895

3.16 CMB access road - 2015

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	3.5893	20.9707	20.7375	0.0336		2.0970	2.0970		1.9293	1.9293	0.0000	3,524.0396	3,524.0396	1.0521		3,546.1331
Total	3.5893	20.9707	20.7375	0.0336		2.0970	2.0970		1.9293	1.9293	0.0000	3,524.0396	3,524.0396	1.0521		3,546.1331

3.17 AC access road pavement - 2015

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.4202	14.1535	6.9813	8.8100e-003		0.8566	0.8566		0.7880	0.7880		926.8285	926.8285	0.2767		932.6391
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	1.4202	14.1535	6.9813	8.8100e-003		0.8566	0.8566		0.7880	0.7880		926.8285	926.8285	0.2767		932.6391

3.17 AC access road pavement - 2015

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.4189	14.1405	6.9749	8.8000e-003		0.8558	0.8558		0.7873	0.7873	0.0000	925.9781	925.9781	0.2764		931.7835
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	1.4189	14.1405	6.9749	8.8000e-003		0.8558	0.8558		0.7873	0.7873	0.0000	925.9781	925.9781	0.2764		931.7835

3.18 Fence and gate - 2015

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.0307	12.1386	5.4600	0.0132		0.4637	0.4637		0.4266	0.4266		1,382.8799	1,382.8799	0.4129		1,391.5497
Total	1.0307	12.1386	5.4600	0.0132		0.4637	0.4637		0.4266	0.4266		1,382.8799	1,382.8799	0.4129		1,391.5497

3.18 Fence and gate - 2015

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.0298		5.4550	0.0132		0.4632	0.4632		0.4262	0.4262	0.0000	1,381.611 2	1,381.611 2	0.4125		1,390.273 1
Total	1.0298		5.4550	0.0132		0.4632	0.4632		0.4262	0.4262	0.0000	1,381.611 2	1,381.611 2	0.4125		1,390.273 1

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
User Defined Industrial	0.00	0.00	0.00		
Total	0.00	0.00	0.00		

4.3 Trip Type Information

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
User Defined Industrial	9.50	7.30	7.30	0.00	0.00	0.00	0	0	0

4.4 Fleet Mix

LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
0.474028	0.063287	0.180321	0.158861	0.070757	0.010543	0.013219	0.016605	0.000784	0.000665	0.005582	0.000318	0.005029

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
NaturalGas Unmitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	1.2589	1.0000e-003	0.1047	1.0000e-005		3.8000e-004	3.8000e-004		3.8000e-004	3.8000e-004		0.2189	0.2189	6.2000e-004		0.2319
Unmitigated	1.2589	1.0000e-003	0.1047	1.0000e-005		3.8000e-004	3.8000e-004		3.8000e-004	3.8000e-004		0.2189	0.2189	6.2000e-004		0.2319

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.2857					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	0.9630					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	0.0102	1.0000e-003	0.1047	1.0000e-005		3.8000e-004	3.8000e-004		3.8000e-004	3.8000e-004		0.2189	0.2189	6.2000e-004		0.2319
Total	1.2589	1.0000e-003	0.1047	1.0000e-005		3.8000e-004	3.8000e-004		3.8000e-004	3.8000e-004		0.2189	0.2189	6.2000e-004		0.2319

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.2857					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	0.9630					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	0.0102	1.0000e-003	0.1047	1.0000e-005		3.8000e-004	3.8000e-004		3.8000e-004	3.8000e-004		0.2189	0.2189	6.2000e-004		0.2319
Total	1.2589	1.0000e-003	0.1047	1.0000e-005		3.8000e-004	3.8000e-004		3.8000e-004	3.8000e-004		0.2189	0.2189	6.2000e-004		0.2319

7.0 Water Detail

7.1 Mitigation Measures Water

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
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10.0 Vegetation
