Calleguas Regional Salinity Management Pipeline, Phases 3 & 4

Final Initial Study – Mitigated Negative Declaration

prepared by

Calleguas Municipal Water District
2100 Olsen Road
Thousand Oaks, California 91360
Contact: Jennifer Lancaster, Principal Resource Specialist

prepared with the assistance of

Rincon Consultants, Inc.
180 North Ashwood Avenue
Ventura, California 93003

February 2023

RINCON CONSULTANTS, INC.
Environmental Scientists | Planners | Engineers
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Initial Study

1. Project Title

Calleguas Regional Salinity Management Pipeline, Phases 3 & 4

2. Lead Agency Name and Address

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

3. Contact Person and Phone Number

Jennifer Lancaster, Principal Resource Specialist
jlancaster@calleguas.com
805-579-7194

4. Project Location

The proposed pipeline alignment would be located in Ventura County, extending approximately 14.4 miles from near the northeast boundary of the city of Camarillo to the western boundary of the city of Simi Valley. The alignment would traverse portions of Camarillo, Moorpark, Thousand Oaks, and Simi Valley, as well as unincorporated Ventura County.

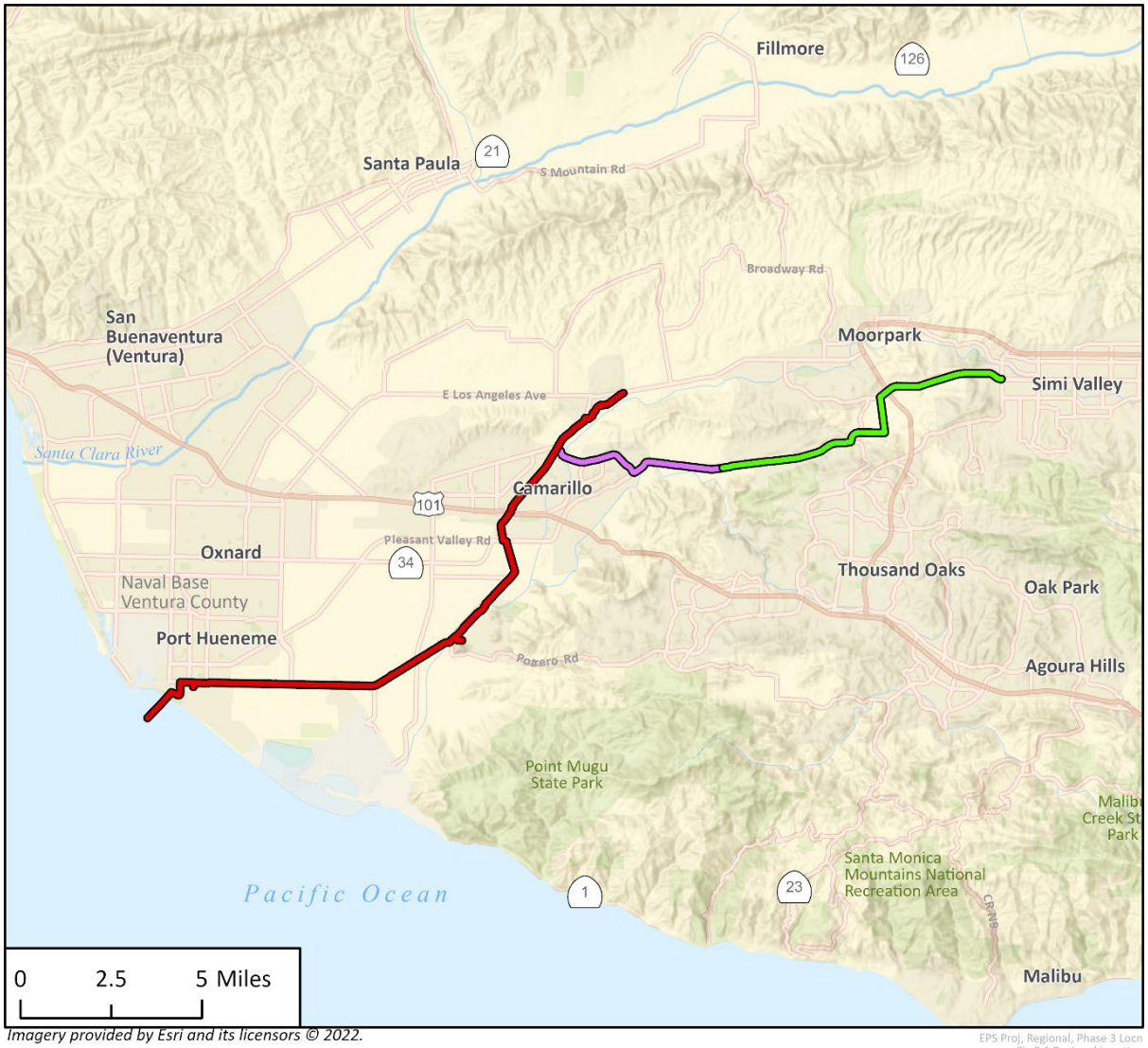
The pipeline alignment would mostly be located within the public right-of-way (ROW) within paved roads and dirt shoulders. A portion of the alignment would extend under private property at the northeast corner of the intersection of Las Posas Road and Upland Road, which is currently developed for agricultural production. Roadways along the project alignment include Upland Road, Santa Rosa Road, Moorpark Road, Read Road, Sunset Valley Road, and Tierra Rejada Road. Each of these roads would provide access to the project alignment during construction activities. Regional access would be provided by State Route 118, State Route 23, State Route 34, and U.S. 101.

Figure 1 shows the regional location of the project alignment and Figure 2 shows the alignment of both phases of the proposed project. Figure 3 and Figure 4 depict the alignment of Phase 3 of the proposed project. Figure 5 and Figure 6 depict the alignment of Phase 4 of the proposed project. The figures identify potential dischargers to the Calleguas Regional Salinity Management Pipeline (CRSMP), which are either currently existing, planned for development, or under consideration.

5. Project Sponsor's Name and Address

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

Figure 1 Regional Location



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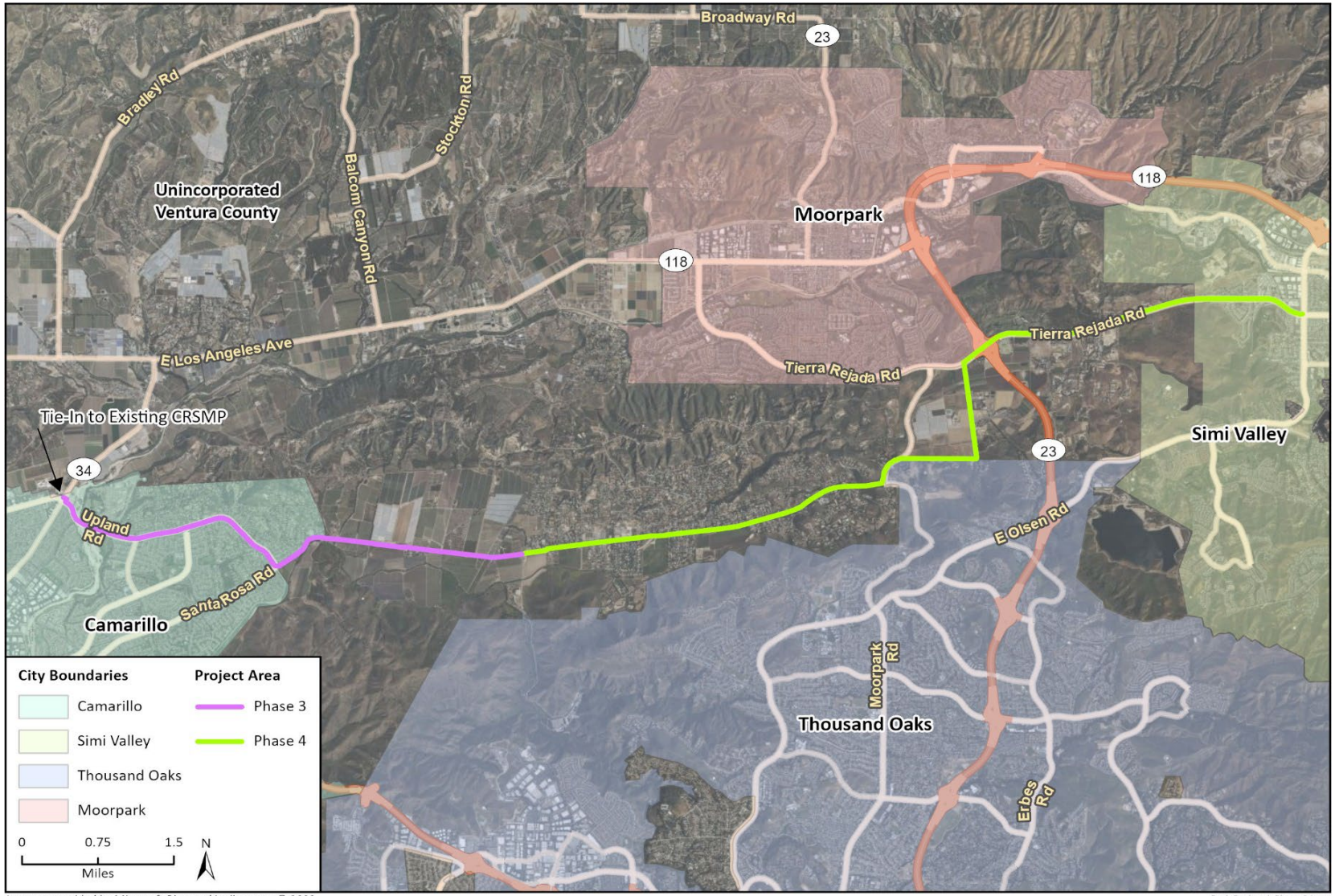
EPS Proj, Regional, Phase 3 Locn
Fig 2.1 Regional Location

Figure 2 Project Site Location



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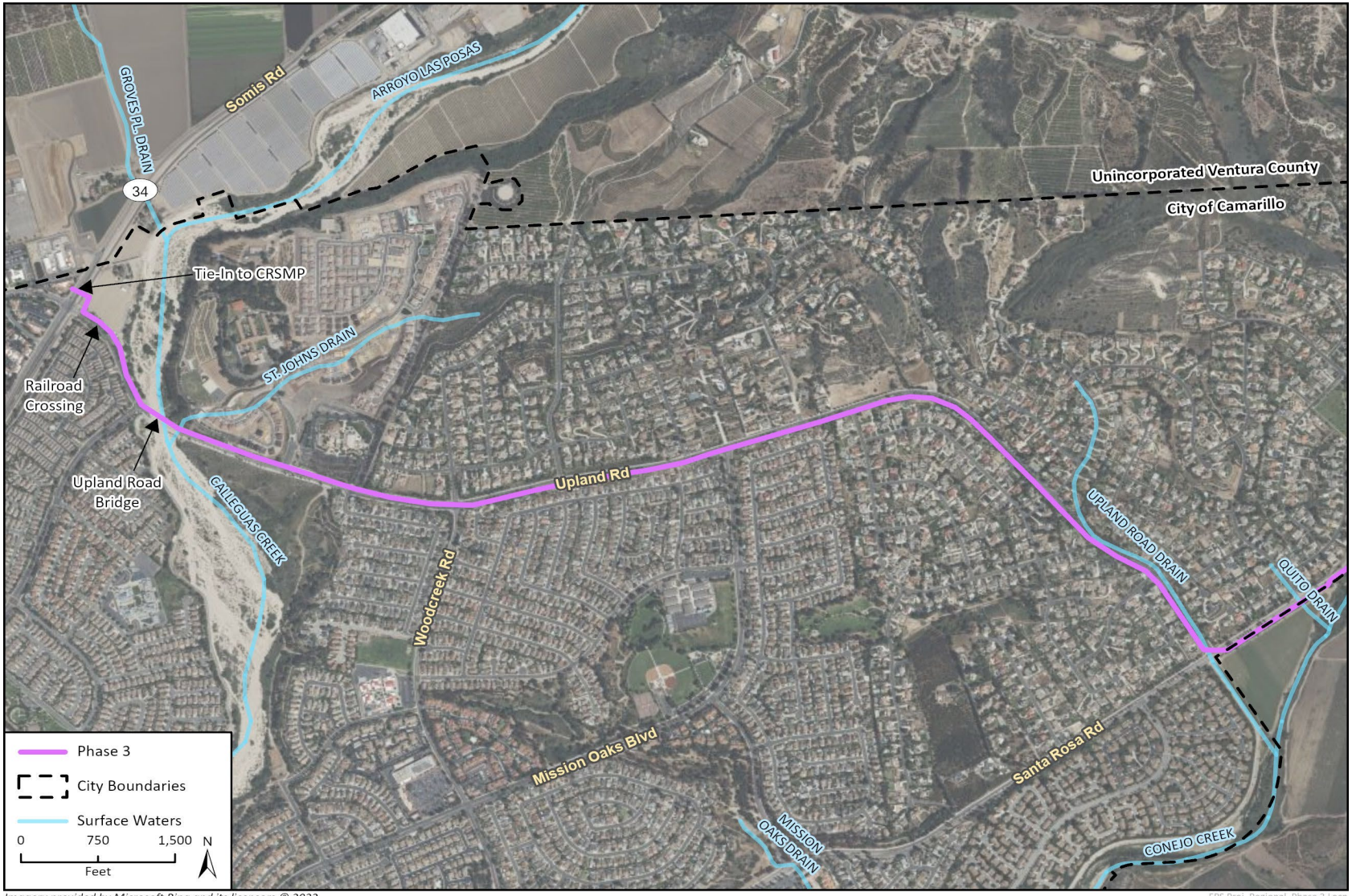
Additional data provided by the County of Ventura.

Proj, Regional, Phase 3 Locn
Fig 2.2 Project Location

Figure 3 Phase 3 Pipeline Location, Western Portion



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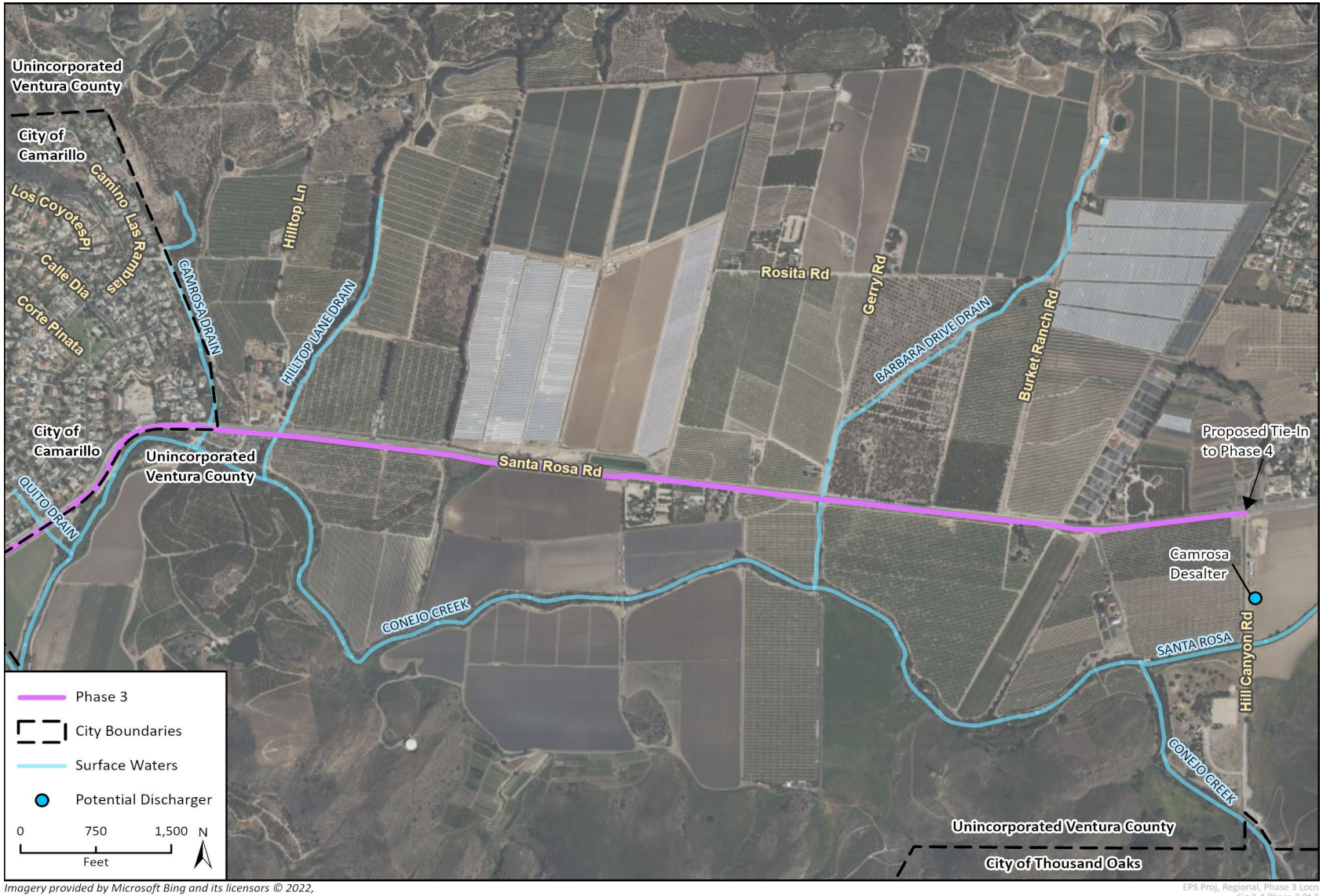
EPS Proj, Regional, Phase 3 Locn
Fig 2.3 Phase 3 Pt 1

Figure 4 Phase 3 Pipeline Location, Eastern Portion



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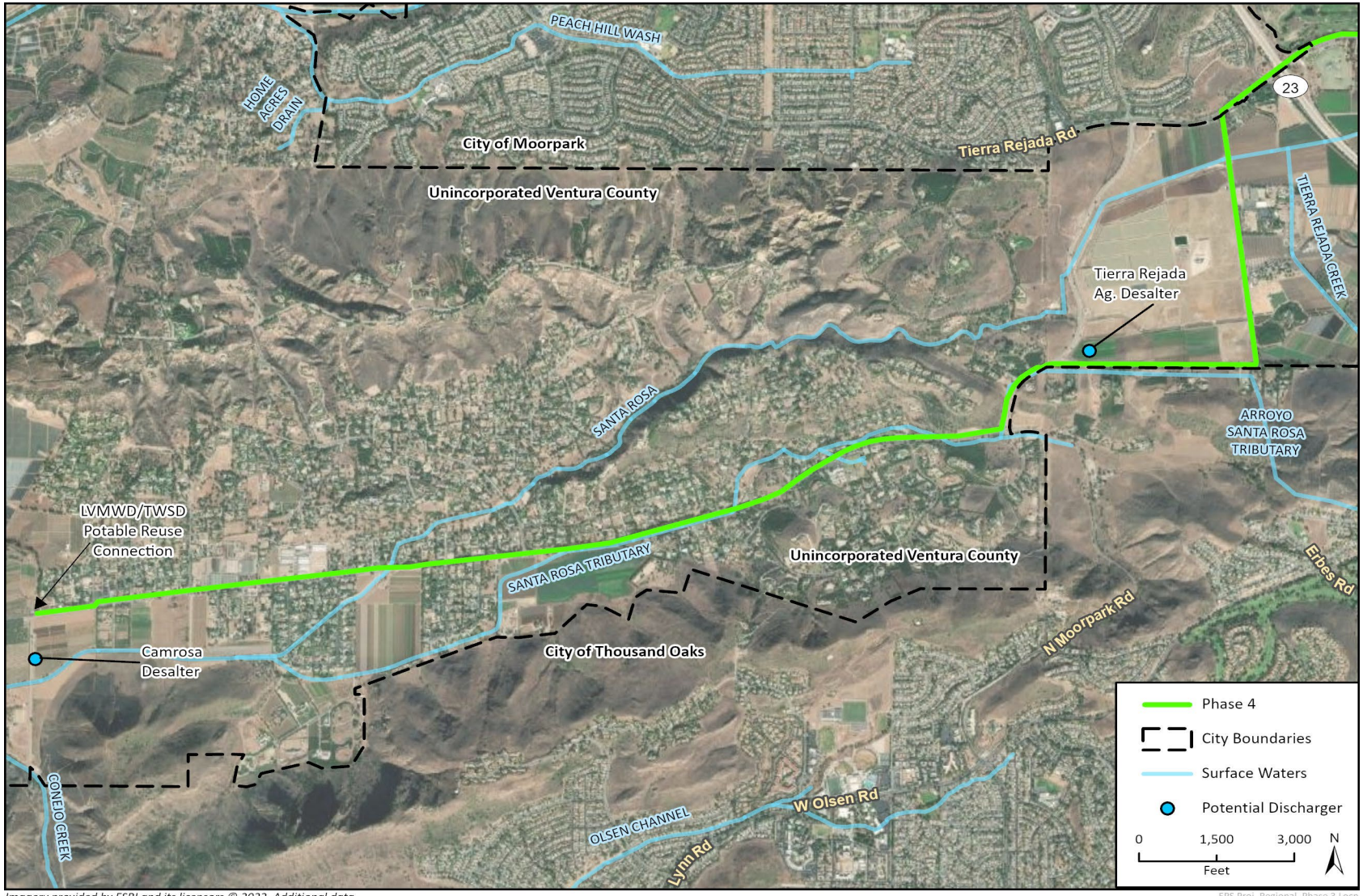
EPS Proj, Regional, Phase 3 Locn
Fig 2.4 Phase 3 Pt 2

Figure 5 Phase 4 Pipeline Location, Western Portion



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EPS Proj, Regional, Phase 3 Locn
Fig 2.5 Phase 4 pt 1

Figure 6 Phase 4 Pipeline Location, Eastern Portion

Imagery provided by ESRI and its licensors © 2022. Additional data provided by USA National Hydrologic Dataset (NHD), 2022.

Proj, Regional, Phase 3 Locn
Fig 2.6 Phase 4 pt 2

6. General Plan Designation

The pipeline alignment is mostly located within existing public roadway ROW and does not have a General Plan land use designation. One portion of the Phase 3 pipeline alignment would cross private property along Upland Road, which has a City of Camarillo land use designation of Agriculture (City of Camarillo 2022a).

7. Zoning

The pipeline alignment is mostly located within existing public roadway ROW and is therefore not zoned. The Phase 3 pipeline alignment would cross private property along Upland Road that is zoned Rural Excusive Residential by the City of Camarillo (City of Camarillo 2022b).

8. Project Background

For decades, local agencies and regulators have been working to address increasing salinity levels in the Calleguas Creek Watershed. The CRSMP was designed to manage the use of high salinity groundwater and treated municipal wastewater, dispose of the brine produced by enhanced water treatment, and facilitate the development of water sources otherwise unavailable due to poor water quality. The CRSMP consists of a pipeline system to transport excess recycled water and brine concentrate generated within the watershed to an ocean outfall. The purpose of the CRSMP is to facilitate the utilization of additional water sources by providing a mechanism to efficiently dispose of the concentrate generated during treatment. The CRSMP has an existing National Pollutant Discharge Elimination System (NPDES) permit for ocean outfall discharges associated with the pipeline (NPDES CA0064521).

The CRSMP was assessed programmatically in a 2002 Final Program Environmental Impact Report (PEIR) which provided California Environmental Quality Act (CEQA) clearance for the overall CRSMP and project-specific clearance for Phase 1 of the CRSMP. It also discussed Phase 2 as a logical extension of Phase 1, with the acknowledgment that additional project-level CEQA review would be required at the time of alignment development for Phase 2 and subsequent phases of the CRSMP. As stated in the 2002 PEIR (pages 1-2), future project-specific analyses would be required "…when assumptions become commitments and fundamental parameters such as the identity, volume and water quality of each potential pipeline contributor are fully identified, and the alignment of pipelines can be finalized."

Table 1 below provides an overview of all CEQA documents prepared to date for the program-level CRSMP and for the project-specific alignment of individual CRSMP phases.

Table 1 Overview of Previous CEQA Analyses

Year	Document Type	Project Name	Project Overview
2002	Program Environmental Impact Report (PEIR) and Environmental Assessment (EA)	Calleguas Regional Salinity Management Pipeline	The CRSMP consists of a pipeline system to transport wastewater and brine concentrate to an existing ocean outfall at the Reliant Energy Ormond Beach Power Generation Station near Point Mugu. Wastewater is defined as tertiary-treated municipal wastewater, and brine is defined as the byproduct of reverse osmosis treatment (or equivalent) of groundwater or wastewater. This document was a joint PEIR and EA to provide compliance with the federal National Environmental Policy Act (NEPA) as well as CEQA. NEPA clearance was required because the project would receive federal funding support through the United States Bureau of Reclamation, also the federal lead agency.
2007	Subsequent EIR (SEIR) and EA to the 2002 PEIR/EA for the CRSMP	Hueneme Outfall Replacement Project	This project was to replace a previously decommissioned outfall in Port Hueneme for use in providing ocean discharge for the CRSMP instead of the Reliant Energy outfall at Ormond Beach as originally planned. This became necessary when the Los Angeles Regional Water Quality Control Board (RWQCB) determined the Reliant Energy outfall may have an insufficient dilution ratio, which limits the ability of the CRSMP to meet the discharge requirements of the Ocean Plan (State Water Resources Control Board [SWRCB] 2019). This document was a joint CEQA/NEPA document (SEIR/EA) due to the federal funding previously described, as well as the federal permits required for the outfall. An EIR-level analysis was required for CEQA because the proposed replacement of a retired outfall could potentially result in significant impacts.
2008	Addendum to the 2007 SEIR/EA for the Hueneme Outfall Replacement Project	Phase 1E Outfall Control and Meter Vault	This addendum evaluated modifications to the Hueneme Outfall Replacement Project, including a modified location for the vault and ancillary facilities, to avoid construction impacts to recreation facilities and residents. This document was an Addendum to the joint SEIR/EA. An EIR-level analysis was not necessary because project modifications were minor and no new or substantially more severe significant impacts or mitigation measures were anticipated.
2009	Initial Study and Mitigated Negative Declaration (IS-MND)	Phase 2 (Lower Reach) Pipeline Alignment Revision	This project provided a modified alignment for Phase 2 of the CRSMP based upon refined engineering and ROW review and included a new control tank to provide operational control of the modified portion of the pipeline. This document was an IS-MND to address potentially new or modified impacts associated with design modifications; an EIR-level analysis was not necessary because impacts did not have the potential to be significant and unavoidable.

Year	Document Type	Project Name	Project Overview
2011	Addendum to the 2009 IS-MND	Phase 2A (Lower Reach) Pipeline Alignment	This project modified the planned location of approximately 1,800 feet of the Phase 2 alignment assessed in the 2009 IS-MND, with the 50- to 65-foot-wide disturbance corridor shifting approximately 75 feet to the east. This document was an Addendum to the 2009 IS-MND because the modifications were limited to the alignment assessed therein and no new or substantially more severe significant impacts or mitigation measures were anticipated.
2014	SEIR to the 2002 PEIR	Phase 2 (Upper Reach) Pipeline Alignment	This project relocated a portion of the Phase 2 (Upper Reach) alignment from that analyzed in the 2002 PEIR. The modified alignment was approximately 0.2 mile shorter, and 2,500 feet east of the alignment analyzed in the 2002 PEIR. This modified alignment crossed agricultural land instead of being situated within public roadways; therefore, new potential impacts could occur. This document was an SEIR because the project addressed changes in design and baseline conditions not foreseen in the 2002 PEIR with the potential to result in significant environmental impacts.

The CRSMP currently extends approximately 22 miles from its upstream end in Somis, in unincorporated Ventura County, to its downstream terminus at the ocean outfall in Port Hueneme. Phases 3 and 4 of the CRSMP ("project" or "proposed project") would extend the CRSMP inland to connect to additional dischargers. Any future phases of the CRSMP and new infrastructure needed to connect additional dischargers would be subject to separate CEQA review.

9. Project Description

The current project consists of Phases 3 and 4 of the Calleguas Regional Salinity Management Pipeline (CRSMP). The proposed project would install an underground pipeline composed of polyvinyl chloride (PVC) and high-density polyethylene (HDPE) materials. An overview of the proposed project is provided in Table 2.

Table 2 Proposed Project Overview

Feature	Phase 3	Phase 4
Length	5.1 miles (27,000 feet)	9.3 miles (49,000 feet)
Diameter	18 inches – 24 inches	12 inches – 24 inches
Alignment	Mostly within public ROW: ▪ Initiates at eastern end of existing CRSMP on west side of Somis Road, approximately 200 feet north of the Las Posas Road / Upland Road intersection in Somis ▪ East across Somis Road to the east side of the Union Pacific Railroad on private property[1] ▪ South to Upland Road just east of the intersection with Las Posas Road ▪ Easterly along Upland Road to the Upland Road bridge and across Calleguas Creek, continuing on Upland Road to Santa Rosa Road[2] ▪ Northeast along Santa Rosa Road, terminating just past Hill Canyon Road	Entirely within public ROW: ▪ Initiates at end of Phase 3, near intersection of Santa Rosa Road and Hill Canyon Road ▪ Eastward along Santa Rosa Road to Moorpark Road ▪ North on Moorpark Road then east on Read Road to Sunset Valley Road ▪ North on Sunset Valley Road to Tierra Rejada Road ▪ East on Tierra Rejada Road to terminate at Madera Road
Easement requirements	Permanent easement 180 feet by 20 feet on the property located at the northeast corner of the intersection of Las Posas Road and Upland Road	n/a
Construction duration (approximate)	16 months	30 months

[1] The Federal Railroad Administration (FRA) requires pipeline crossings under railroads to comply with design specifications such as, but not limited to, the following: installation of crossing is conducted by boring or jacking, if practicable; crossing occurs at a right angle, or as close thereto as possible, and not less than 45 degrees; pipeline is not placed within a culvert or within 100 feet of a railway bridge or other structure.

[2] Crossing Calleguas Creek would be accomplished by installing the pipeline inside an existing vacant utility cell in the deck of the Upland Road bridge. Coordination with the owner of the bridge, the City of Camarillo, has been initiated, including completing a structural analysis of the bridge to confirm the bridge has sufficient load capacity to carry the pipeline under full flow.

Phases 3 and 4 would connect additional dischargers to the CRSMP. Discharges from these phases, as well as previously constructed phases, would intermingle and combine to create the effluent discharged through the ocean outfall. Effluent would be subject to existing NPDES constituent limits at the outfall. Prescribed sampling requirements in the NPDES permit necessitate weekly, monthly, quarterly, and semi-annual monitoring of effluent as well as monitoring of receiving water twice a year, monitoring of sediment every two years, and a biological monitoring study involving mussels that would occur once during the term of the permit. Additionally, while not required by the NPDES permit, Calleguas monitors the individual discharges quarterly for all effluent limit constituents except toxicity and radioactivity.

Phases 3 and 4 of the CRSMP would typically be installed in 20- to 40-foot sections. The majority of the pipeline would be installed via conventional open-cut trench construction methods. Trenchless construction methods would be used to cross below existing drainage channels. Trenchless construction methods would also be used to cross Somis Road, Santa Rosa Road, and busy intersections to minimize traffic impacts.

Project Construction

The typical construction sequence for the proposed project would include the following pipeline installation phases:

- **Open-cut trench pipeline installation** typically consists of trench excavation (including saw cutting of pavement where applicable), pipe bedding stabilization, pipe installation, and backfill. The construction crew would typically operate a backhoe and/or excavator, compaction equipment (attachment on an excavator and hand-operated equipment), dump trucks for stockpiling of soils and delivery of backfill material, utility trucks (with truck-mounted or towed generator and hand tools), and water trucks/water buffalos. Where required by the jurisdictional agency to backfill with sand cement slurry, concrete trucks would delivery slurry to the project site.
- **Trenchless installation** typically consists of excavation of launching and receiving pits (including saw cutting of pavement where applicable), installation of shoring system and boring equipment, installation of steel casing and pipeline, removal of equipment, and backfill. This step typically includes the excavation and backfill of the pits using an excavator, dump truck, and potentially a second mini excavator inside the pits. The trenchless installation would be performed by operating a crane to lower and remove equipment and materials.
- **Paving** and **ground restoration** typically is performed at the completion of each segment of pipeline and then at the end of a project once all excavation and backfill operations have been completed.

The maximum depth of excavation typically would be 8 feet. Where the pipeline would need to cross below an existing utility or drainage channel, the depths may be greater and would depend on the characteristics of the utility or channel.

Based on an installation rate of 80 feet per day and a 4-foot-wide trench, the average amount of excess spoils requiring removal would be approximately 60 cubic yards per day and would require approximately 7 haul roundtrips per day. The average daily number of heavy-duty trucks hauling material to and from the construction site (including the delivery of pipe sections and miscellaneous supplies, hauling of pipe bedding and backfill materials, and removal of excess spoils) would be approximately 14 haul roundtrips per day.

Generally, trench spoils would be temporarily stockpiled within the construction staging and storage area, then backfilled to the trench after pipeline installation or hauled away for re-use or disposal at an appropriately licensed landfill. Storage of materials and equipment would be dependent upon the location of the contractor and subcontractors. If the contractors are local, they may store equipment and materials in their own yards.

If groundwater dewatering is required based on site conditions, the project would adhere to applicable rules and regulations related to discharge. Depending on the quality of the dewatered groundwater, water could be trucked off-site for reuse for dust control and irrigation.

Construction Schedule

Construction would mostly be limited to normal construction hours between 7:00 am and 4:30 pm, Monday through Friday. Weekend work, as well as evening and nighttime work between the hours of 4:30 pm and 7:00 am, may be required to install the trenchless portions of the pipelines. In areas where traffic conditions require non-traditional working hours, night and weekend work could also be necessary. Additionally, the tie-in connection to the CRSMP would require the shutdown of the

CRSMP, consequently requiring work be performed continuously until complete. Work hours would be finalized through the roadway encroachment permitting and design process.

Construction is anticipated to require approximately 16 months for Phase 3 and 30 months for Phase 4. Due to uncertainties about the anticipated timing of dischargers, duration of permitting and design, and other considerations, there is currently no planned start date.

Traffic Controls

To minimize traffic impacts to the traveling public, trenchless construction methods would be used to cross busy intersections as well as Somis Road and Santa Rosa Road.

Save for a short segment of alignment along Santa Rosa Road and in front of certain driveways requiring flagger-controlled traffic controls, a minimum of one lane of traffic in each direction would be open during project construction. Construction phasing across arterial roads and driveways would be implemented to maintain access across these locations. Properties with multiple driveways and access points would have only one driveway closed at a time to maintain access to the property.

Best Management Practices

During construction of the proposed project, Calleguas' construction contractor would implement best management practices (BMPs) in accordance with the project's specifications. BMPs for the proposed project are anticipated to include measures for the protection of aesthetics, air quality, and noise control are listed below:

- **Protection of Air Quality.** Dust control would be conducted during ground-disturbing activities using an approved method such as water application, no substantial ground-disturbing activities would be conducted during periods of high winds, on-site construction vehicles would not travel at speeds greater than 15 miles per hour in unpaved areas, and trucks transporting earth material to or from the project site would be covered and would maintain a minimum two-foot freeboard.
- **Noise Control.** Noise abatement measures would be implemented as needed including acoustical mufflers and engine shielding on construction equipment, limiting the number and duration of equipment idling, directing noise away from residences, and maintaining equipment in good condition without rattling or banging of parts.
- **Nighttime Construction Lighting**. In the event nighttime construction lighting is needed, the lighting would be directed downwards towards construction activities and would be shielded so as to minimize visibility from adjacent land uses.

Project Operation and Maintenance

Once construction is complete, Calleguas staff would periodically inspect the pipeline and perform routine maintenance. Valves on the appurtenances would be exercised roughly once per year and the pipeline alignment would be marked as needed in response to DigAlert (utility marking) requests.

The proposed project would operate under open channel flow, meaning the contents of the pipeline would be propelled by gravity. Project operation would not introduce new electricity demands.

In the event any project component is compromised during operation, Calleguas would temporarily cease operations and conduct emergency repairs as soon as possible; emergency response and

repairs are part of Calleguas' normal operations to maintain system integrity and reliability and are not a new or increased activity associated with the project.

10. Surrounding Land Uses and Setting

General Plan land use designations along the project alignment include City of Camarillo Rural Density, Low Density, Low-Medium Density, and Public designations along Upland Road (City of Camarillo 2022a); County of Ventura Agriculture, Open Space, and Very Low-Density Residential designations along Santa Rosa Road (County of Ventura 2022); County of Ventura Open Space and City of Thousand Oaks Reserve Residential designations along Read Road (City of Thousand Oaks 2022); County of Ventura Open Space designation along Sunset Valley Road (County of Ventura 2022); and County of Ventura Open Space and City of Simi Valley Open Space, Medium Density Residential, Moderate Density Residential, Neighborhood Park, Mobile Home, Community Park, and General Commercial designations along Tierra Rejada Road (City of Simi Valley 2021; County of Ventura 2022).

11. Other Public Agencies Whose Approval is Required

The proposed project would require permits from the following agencies:

- City of Camarillo
- County of Ventura Transportation Department
- California Department of Transportation
- Ventura County Watershed Protection District
- City of Moorpark
- City of Simi Valley

12. Have California Native American Tribes Traditionally and Culturally Affiliated with the Project Area Requested Consultation Pursuant to Public Resources Code Section 21080.3.1?

Calleguas has not received any formal requests for consultation from any Native American tribes traditionally and culturally affiliated with the project area pursuant to Assembly Bill (AB) 52; however, Calleguas provided courtesy notifications to such tribes on December 8, 2022. This included distributing letters to tribes with known traditional and cultural affiliations with the project area to request review and input on the proposed project. One tribe, the Fernandeño Tataviam Band of Mission Indians, responded and requested formal consultation. At the time of this Initial Study, the consultation is ongoing and the results will inform the analysis that will be prepared for the EIR.

Environmental Factors Potentially Affected

This project would potentially affect the environmental factors checked below, involving at least one impact that is "Potentially Significant" or "Less than Significant with Mitigation Incorporated" as indicated by the checklist on the following pages.

☐	Aesthetics	☐	Agriculture and Forestry Resources	☐	Air Quality
■	Biological Resources	■	Cultural Resources	☐	Energy
■	Geology/Soils	☐	Greenhouse Gas Emissions	☐	Hazards & Hazardous Materials
☐	Hydrology/Water Quality	☐	Land Use/Planning	☐	Mineral Resources
■	Noise	☐	Population/Housing	☐	Public Services
☐	Recreation	■	Transportation	■	Tribal Cultural Resources
☐	Utilities/Service Systems	☐	Wildfire	■	Mandatory Findings of Significance

Determination

Based on this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☐ 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 revisions to the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

■ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "less than significant with mitigation incorporated" 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.

☐ I find that although the proposed project could have a significant effect on the environment, because all potential 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.

Signature	Date
Printed Name	Title

Environmental Checklist

1. Aesthetics

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
a. Have a substantial adverse effect on a scenic vista?	☐	☐	■	☐
b. Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	■
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	■	☐
d. Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?	☐	☐	■	☐

a. Would the project have a substantial adverse effect on a scenic vista?

Scenic vistas are viewpoints that provide expansive views of highly valued landscape for the public benefit. The project alignment would be primarily located within existing roadways in Camarillo, Thousand Oaks, Moorpark, and Simi Valley, as well as unincorporated Ventura County.

The Community Design Element of the City of Camarillo's General Plan references Calleguas Creek as open space area, but does not explicitly identify scenic vistas within the city (City of Camarillo 2012). Phase 3 of the proposed project would cross Calleguas Creek along Upland Road. Within unincorporated Ventura County along Santa Rosa Road, Sunset Valley Road, and Tierra Rejada Road, the project alignment is not adjacent to or visible from County-designated Scenic Protection Overlay Zones (County of Ventura 2020b). The Natural Resources Element of the City of Simi Valley's General Plan identifies hills, ridgelines, canyons, bluffs, significant rock outcroppings, and open space areas surrounding the city as visual resources (City of Simi Valley 2012). The Natural Resources Element indicates features comprising scenic resources are present in the vicinity of the

project alignment, specifically the portion within Simi Valley traversing Tierra Rejada Road with adjacent open space. The proposed pipeline would be constructed within Upland Road and Santa Rosa Road in Camarillo, both of which are designated as local scenic corridors in the City of Camarillo General Plan (City of Camarillo 2012). In Moorpark, the pipeline would be constructed within Moorpark Road, which is designated as a local scenic corridor in the City of Moorpark General Plan (City of Moorpark 1986).

Visual resources in the vicinity of the pipeline alignment generally consist of views of urban development, residential neighborhoods, agricultural lands, and open space areas located on either side of the public ROW. During construction activities, the existing scenic character of the project site's roadways would be temporarily affected by the staging and operation of construction equipment, which would be visible from the Upland Road, Santa Rosa Road, and Moorpark Road scenic corridors.

During construction of the proposed pipeline, scenic vistas visible to travelers on Upland Road, Santa Rosa Road, Sunset Valley Road, and Tierra Rejada Road would be temporarily impaired by the staging and operation of construction equipment. Once construction of the pipeline is complete, the pipeline would not result in permanent aesthetic changes that would alter scenic vistas from their existing conditions because it would be mostly underground, except for small air vents that would be painted beige to be visually unobtrusive. Operational activities would not obstruct views of scenic vistas along the project alignment. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

b. Would the project substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

The nearest designated state scenic highway to the project is State Route 27, approximately 15 miles southeast of the project's alignment along Tierra Rejada Road (California Department of Transportation [Caltrans] 2019). A portion of State Route 118, approximately 1.3 miles north of the project's alignment on Tierra Rejada Road, is eligible for designation as a state scenic highway (Caltrans 2019).

The project alignment is not located on a state scenic highway and is not visible from a state scenic highway (Caltrans 2019). The proposed project would therefore not damage scenic resources within a state scenic highway. No impact would occur.

NO IMPACT

c. Would the project, in non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

The project alignment is primarily bounded by residential, agricultural, and open space land uses. Because the project traverses both urbanized and non-urbanized areas, this analysis evaluates both potential degradation of existing visual character and potential conflicts with zoning and other regulations governing scenic quality.

The proposed project would extend the CRSMP underground primarily within existing roadway ROW. A portion of the alignment would extend under private property at the northeast corner of

the intersection of Las Posas Road and Upland Road. The project would temporarily stage construction equipment on site and consist of open-cut trench and trenchless pipeline construction activities; however, these impacts would be temporary and would be limited to the project construction period. Upon completion of construction, ground surfaces would be restored to pre-project conditions. The proposed project would not substantially degrade the existing visual character or quality of public views of the site and its surroundings. In addition, because the pipeline would not change surface land uses, the project would not conflict with applicable zoning of land uses along the alignment. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

d. Would the project create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?

Construction would generally occur during the daytime hours and would not require the use of lighting. If evening or nighttime work is required to install trenchless portions of the pipeline or due to traffic control requirements, construction lighting would be needed. In this case, lights may be visible from surrounding roadways and residences. Per the project's construction BMPs, in the event nighttime lighting is needed, the lighting would be directed downwards towards construction activities and would be shielded so as to minimize visibility from adjacent land uses. Furthermore, during installation of the proposed pipeline, the active construction area and any associated lighting would move along the alignment as each segment of pipeline is installed, making construction lighting impacts not only temporary but also short-term at any individual light receiver. The proposed pipeline would not create a new source of light or glare once construction is complete because the proposed pipeline would be underground.

Thus, the proposed project would not create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the vicinity of the project alignment, and there would be a less than significant impact.

LESS THAN SIGNIFICANT IMPACT

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2. Agriculture and Forestry Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	■
b. Conflict with existing zoning for agricultural use or a Williamson Act contract?	☐	☐	☐	■
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)); timberland (as defined by Public Resources Code Section 4526); or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	☐	☐	☐	■
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	■
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	■

a. Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

No portion of the project alignment is mapped as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland). The proposed pipeline alignment is located primarily within existing roadways. A portion of the alignment would extend under private property at the northeast corner of the intersection of Las Posas Road and Upland Road, which is currently developed for agricultural production and designated as "Other Land" by the California Department of Conservation's (DOC) Farmland Mapping and Monitoring Program (DOC 2022). The project alignment is situated adjacent to mapped Farmland as identified by the DOC (DOC 2022).

Because no portion of the project alignment is mapped as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, the project would not convert mapped Farmland to non-agricultural use. Project construction activities along public ROW would be restricted to the roadway corridors and would not extend onto adjacent mapped farmland. Construction activities at the private property located at the intersection of Las Posas Road and Upland Road, classified as "Other Land," would temporarily interrupt agricultural production at the site. However, upon completion of construction, the ground surface would be restored to pre-project conditions. As such, the project would not convert mapped Farmland to non-agricultural use. There would be no impact.

NO IMPACT

b. Would the project conflict with existing zoning for agricultural use or a Williamson Act contract?

A portion of the alignment would extend under private property at the northeast corner of the intersection of Las Posas Road and Upland Road, which is currently zoned Rural Exclusive Residential and does not have a Williamson Act contract. As such, the project would not conflict with existing zoning for agricultural use or a Williamson Act contract. No impact would occur.

NO IMPACT

c. Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)); timberland (as defined by Public Resources Code Section 4526); or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

d. Would the project result in the loss of forest land or conversion of forest land to non-forest use?

The project alignment and surrounding vicinity are not designated or zoned for forest land, timberland, or timberland zoned Timberland Production. The proposed project would consist of a pipeline for excess recycled water and brine concentrate conveyance and would not change the land uses on the project alignment or facilitate off-site loss of forest land or conversion of forest land to non-forest use. Therefore, implementation of the proposed project would not convert any forest land to non-forest use, nor would it conflict with existing zoning for such lands. As such, no impact to forests or timberland would occur.

NO IMPACT

e. Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?

As previously discussed under thresholds (a) through (d) above, the proposed project would not result in the conversion of Farmland or forest land to non-agricultural or non-forest uses. Proposed project activities would be limited to pipeline installation and operational activities and would not result in other changes to the existing environment that could result in conversion of Farmland to non-agricultural use or forest land to non-forest use. No impact would occur.

NO IMPACT

3. Air Quality

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	■
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	■	☐
c. Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	■	☐
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	■	☐

The analysis in this section relies on the Air Quality and Greenhouse Gas Study prepared for the project in January 2023 and appended to this Initial Study as Appendix A.

Air Quality Standards and Attainment

The project site is located in the South Central Coast Air Basin (SCCAB), which is under the jurisdiction of the Ventura County Air Pollution Control District (VCAPCD). VCAPCD is required to monitor air pollutant levels to ensure the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) are met. If the standards are met, the SCCAB is classified as being in "attainment." If the standards are not met, the SCCAB is classified as being in "nonattainment" and VCAPCD is required to develop strategies to meet the standards. According to the California Air Resources Board (CARB) Area Designation Maps, the project site is located in a region identified as being in nonattainment for the ozone NAAQS and CAAQS and non-attainment for the particulate matter 10 microns or less in diameter (PM_{10}) CAAQS (CARB 2022). Table 3 provides a summary of air pollutants for which the SCCAB has nonattainment status along with associated impacts to health. VCAPCD is currently planning to adopt the 2022 Ventura County Air Quality Management Plan (AQMP), which provides a strategy for the attainment of the 2015 federal 8-hour ozone standard (VCAPCD 2022).

Table 3 Health Effects Associated with Non-Attainment Criteria Pollutants

Pollutant	Adverse Effects
Ozone	(1) Short-term exposures: (a) pulmonary function decrements and localized lung edema in humans and animals and (b) risk to public health implied by alterations in pulmonary morphology and host defense in animals; (2) long-term exposures: 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; (3) vegetation damage; and (4) property damage.
Suspended particulate matter (PM_{10})	(1) Excess deaths from short-term and long-term exposures; (2) excess seasonal declines in pulmonary function, especially in children; (3) asthma exacerbation and possibly induction; (4) adverse birth outcomes including low birth weight; (5) increased infant mortality; (6) increased respiratory symptoms in children such as cough and bronchitis; and (7) increased hospitalization for both cardiovascular and respiratory disease (including asthma).[1]

[1] More detailed discussion on the health effects associated with exposure to suspended particulate matter can be found in the following documents: United States Environmental Protection Agency (USEPA), Air Quality Criteria for Particulate Matter, October 2004.

Source: USEPA 2016

Air Pollutant Emission Thresholds

VCAPCD's Ventura County Air Quality Assessment Guidelines (2003) recommend specific air criteria pollutant emission thresholds for determining whether a project may have a significant adverse impact on air quality within the Basin. VCAPCD identifies separate ozone significance thresholds for (1) the Ojai Planning Area, (2) the City of Simi Valley, and (3) the remainder of Ventura County. The proposed project is a linear pipeline that traverses across two of these geographic areas: the city of Simi Valley and the remainder of Ventura County (outside of the Ojai Planning Area). As such, both of those ozone significance thresholds are applicable to the proposed project.

VCAPCD recommends a 25 pounds per day significance threshold for ozone precursor emissions (ROC and NO_X) in Ventura County for areas outside of the Ojai Planning Area and the City of Simi Valley. For development projects in the City of Simi Valley, VCAPCD notes that the City of Simi Valley uses a significance threshold of 13.7 tons per year for ozone precursors, as directed by the City of Simi Valley City Council. Exceedance of the thresholds would indicate that a development project could jeopardize the attainment of the ozone standard. Both the Ventura County and Simi Valley thresholds are applicable to the project, and they represent different time scales. Therefore, this analysis adopts both significance thresholds for the project. Impacts would be considered significant if the project's emissions exceed 25 pounds per day or 13.7 tons per year for ozone precursors. VCAPCD BMPs are required if project emissions exceed the ozone precursor thresholds.

VCAPCD has not established quantitative thresholds for particulate matter for either operation or construction. VCAPCD indicates a project generating fugitive dust emissions in such quantities as to cause injury, detriment, nuisance, or annoyance to any considerable number of persons, or which may endanger the comfort, repose, health, or safety of any such person, or which may cause or have a natural tendency to cause injury or damage to business or property, would have a significant air quality impact. This threshold is applicable to the generation of fugitive dust during grading and excavation activities. The 2003 VCAPCD guidelines require fugitive dust mitigation measures be applied to all dust-generating activities. Such measures include minimizing a project's disturbance area, watering a site prior to commencement of ground-disturbing activities, covering all truck loads, and limiting on-site vehicle speeds to 15 miles per hour or less on unpaved surfaces.

a. *Would the project conflict with or obstruct implementation of the applicable air quality plan?*

A project may be inconsistent with the applicable air quality plan if the project would generate population, housing, or employment growth exceeding the forecasts used in the development of the plan. This analysis examines the proposed project's consistency with the VCAPCD's 2016 Ventura County AQMP. The 2016 Ventura County AQMP relies on the Southern California Association of Governments' 2016 Regional Transportation Plan/Sustainable Communities Strategy forecasts of regional population growth in its projections for managing Ventura County's air quality (Southern California Association of Governments 2016).

As discussed in Environmental Checklist Section 14, *Population and Housing,* no direct growth would occur as a result of the project because it does not propose new homes, businesses, or other land uses that would generate population growth. As discussed in the 2014 SEIR for Phase 2 of the CRSMP, any additional water supply projects facilitated by the extended CRSMP would improve the reliability of local water supplies and reduce the region's reliance on imported supplies. These projects have likely been identified already in planning documents such as Urban Water Management Plans (UWMPs). For example, the Camrosa Water District's 2020 UWMP identifies a potential groundwater desalter project to treat for nitrates in the Santa Rosa Basin. If developed, the desalter would discharge brine from the treatment process to the CRSMP. According to the UWMP, the purpose of the desalter would be to improve water quality in the Santa Rosa Basin and increase Camrosa Water District's self-reliance (Camrosa Water District 2021). The project would therefore not generate population, housing, or employment growth exceeding the forecasts used in the development of the plan.

As such, the project would not conflict with or obstruct implementation of the applicable air quality plans. No impact would occur.

NO IMPACT

b. Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

The proposed project would generate short-term emissions associated with project construction and negligible operational emissions associated with worker trips for maintenance and inspection of the pipeline. Construction and operational emissions were estimated using the California Emissions Estimator Model (CalEEMod) version 2020.4.0. This analysis conservatively compares total project emissions against the VCAPCD recommended threshold for Ventura County (outside of the Ojai Planning Area) and Simi Valley, rather than a subset of emissions matching project activities within each individual area.

Construction Emissions

Project construction would generate temporary air pollutant emissions. These impacts are associated with fugitive dust and exhaust emissions from heavy-duty construction vehicles. The excavation phase of the project would involve the largest use of heavy equipment and generation of fugitive dust. As shown in Table 4 and Table 5, based on the duration of construction activities and the equipment to be utilized on site, the proposed project's short-term construction-related emissions of ROC or NO_X would not exceed the VCAPCD threshold of 13.7 tons per year in Simi Valley and 25 pounds per day for elsewhere in Ventura County. In addition, the project would include BMPs to control fugitive dust consistent with Ventura County Air Quality Assessment

Guidelines, Section 7.4.1. Therefore, construction-related project emissions would not violate air quality standards, and impacts would be less than significant.

Table 4 Estimated Maximum Daily Construction Emissions (lbs/day)

	ROC	NO_x	CO	SO_2	PM_{10}	$PM_{2.5}$
Phase 3						
2024	2	17	21	<1	2	1
2025	1	9	13	<1	1	1
Phases 4						
2025	2	18	22	<1	3	1
2026	2	18	20	<1	3	1
2027	1	9	14	<1	1	1
2028	1	9	14	<1	1	1
Maximum Emissions	**2**	**18**	**22**	**<1**	**3**	**1**
VCAPCD Thresholds[1]	25	25	N/A	N/A	N/A	N/A
Threshold Exceeded?	**No**	**No**	**N/A**	**N/A**	**N/A**	**N/A**

VCAPCD = Ventura County Air Pollution Control District; ROC = reactive organic compounds; NO_X = nitrogen oxides; CO = carbon monoxide; SO_X = sulfur oxides; PM_{10} = particulate matter 10 microns or less in diameter; $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter

[1] VCAPCD Threshold for Ventura County outside of Ojai Planning Area.

Notes: This table provides a conservative analysis and presents the maximum daily emissions when the construction phases overlap.

See Appendix A for modeling details and CalEEMod results.

Some totals may not add up due to rounding. Emissions data is sourced from "Table 2.1 Construction Emission" results in Appendix A, which incorporate emissions reductions from measures to be implemented during project construction, such as watering of soils during construction required under VCAPCD Rule 55.

Table 5 Estimated Annual Construction Emissions (tons/year)

	ROC	NO_x	CO	SO_2	PM_{10}	$PM_{2.5}$
Phase 3						
2024	<1	1	1	<1	<1	<1
2025	<1	1	1	<1	<1	<1
Phases 4						
2025	<1	1	1	<1	<1	<1
2026	<1	1	2	<1	<1	<1
2027	<1	1	2	<1	<1	<1
2028	<1	<1	<1	<1	<1	<1
Maximum Emissions	**<1**	**1**	**2**	**<1**	**<1**	**<1**
VCAPCD Thresholds[1]	13.7	13.7	N/A	N/A	N/A	N/A
Threshold Exceeded?	**No**	**No**	**N/A**	**N/A**	**N/A**	**N/A**

VCAPCD = Ventura County Air Pollution Control District; ROC = reactive organic compounds; NO_X = nitrogen oxides; CO = carbon monoxide; SO_X = sulfur oxides; PM_{10} = particulate matter 10 microns or less in diameter; $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter

[1]VCAPCD Threshold for Simi Valley.

Notes: This table provides a conservative analysis and presents the maximum daily emissions when the construction phases overlap.

See Appendix A for modeling details and CalEEMod results.

Some totals may not add up due to rounding. Emissions data is sourced from "Table 2.1 Construction Emission" results in Appendix A, which incorporate emissions reductions from measures to be implemented during project construction, such as watering of soils during construction required under VCAPCD Rule 55.

Operational Emissions

Operation of the project would generate criteria air pollutant emissions associated with area sources (e.g., off-gassing of repaved roadways and roadway striping) and mobile sources. The project's operational mobile emissions would include annual site visits to the pipeline alignment for visual inspection, maintenance activities, and as-needed repairs. Table 6 and Table 7 summarize the project's maximum daily operational emissions. As shown therein, operational emissions would not exceed VCAPCD's threshold of 13.7 tons per year in Simi Valley and 25 pounds per day for Ventura County. Therefore, impacts associated with operational emissions would be less than significant.

Table 6 Estimated Maximum Daily Operational Emissions (lbs/day)

Emissions Source	ROC	NO_x	CO	SO_2	PM_{10}	$PM_{2.5}$
Phase 3						
Area	<1	<1	<1	<1	<1	<1
Phase 4						
Area	<1	<1	<1	<1	<1	<1
Phase 3 & 4 Combined Mobile Emissions						
Mobile	<1	<1	<1	<1	<1	<1
Total	**<1**	**<1**	**<1**	**<1**	**<1**	**<1**
VCAPCD Thresholds[1]	25	25	N/A	N/A	N/A	N/A
Threshold Exceeded?	**No**	**No**	**N/A**	**N/A**	**N/A**	**N/A**

VCAPCD = Ventura County Air Pollution Control District; ROC = reactive organic compounds; NO_X = nitrogen oxides; CO = carbon monoxide; SO_X = sulfur oxides; PM_{10} = particulate matter 10 microns or less in diameter; $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter

[1]VCAPCD Threshold for Ventura County outside of Ojai Planning Area.

See Appendix A for modeling details and CalEEMod results.

Notes: Some totals may not add up due to rounding. Emissions data is sourced from "Table 2.2 Operational Emission" results in Appendix A, which incorporate emissions reductions from measures to be implemented during project construction, such as watering of soils during construction required under VCAPCD Rule 55.

Table 7 Estimated Annual Operational Emissions (tons/year)

Emissions Source	ROC	NO_x	CO	SO_2	PM_{10}	$PM_{2.5}$
Phase 3						
Area	<1	<1	<1	<1	<1	<1
Phase 4						
Area	<1	<1	<1	<1	<1	<1
Phase 3 & 4 Combined Mobile Emissions						
Mobile	<1	<1	<1	<1	<1	<1
Total	**<1**	**<1**	**<1**	**<1**	**<1**	**<1**
VCAPCD Thresholds[1]	13.7	13.7	N/A	N/A	N/A	N/A
Threshold Exceeded?	**No**	**No**	**N/A**	**N/A**	**N/A**	**N/A**

VCAPCD = Ventura County Air Pollution Control District; ROC = reactive organic compounds; NO_X = nitrogen oxides; CO = carbon monoxide; SO_X = sulfur oxides; PM_{10} = particulate matter 10 microns or less in diameter; $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter

[1]VCAPCD Threshold for Simi Valley.

See Appendix A for modeling details and CalEEMod results.

Notes: Some totals may not add up due to rounding. Emissions data is sourced from "Table 2.2 Operational Emission" results in Appendix A, which incorporate emissions reductions from measures to be implemented during project construction, such as watering of soils during construction required under VCAPCD Rule 55.

LESS THAN SIGNIFICANT IMPACT

c. *Would the project expose sensitive receptors to substantial pollutant concentrations?*

VCAPCD defines sensitive receptors as facilities or land uses that include members of the population particularly sensitive to the effects of air pollutants, such as children, the elderly, and people with illnesses. Examples of sensitive receptors listed in the VCAPCD Guidelines (2003) include schools, hospitals, and daycare centers; sensitive receptors also typically include residences. The project alignment would be constructed adjacent to sensitive receptors, including residences along Upland Road, Santa Rosa Road, and Tierra Rejada Road and the Santa Rosa Technology Magnet School along Santa Rosa Road.

The potential for project construction to expose sensitive receptors to substantial pollutant concentrations is discussed in the following subsection. The proposed project does not include any stationary sources of air pollutant emissions.

Toxic Air Contaminants

Health impacts associated with toxic air contaminants (TACs) are generally associated with long-term exposure. The greatest potential for TAC emissions would be during construction, which may result in a short-term increase of TAC emissions.

Construction

The greatest potential for TAC emissions during construction would be from heavy equipment operations that generate diesel particulate matter (DPM) emissions. Generation of DPM from construction projects typically occurs in a single area for a short period. As discussed under item (b), project construction would result in emissions of criteria pollutants, including PM_{10}, ROC, and NO_X. The construction emissions for the proposed project would move linearly along the Phase 3 and 4 pipeline alignment. The project would install approximately 80 feet of pipeline per day and would expose sensitive receivers to construction TAC emissions for approximately 25 days.[1] Therefore, exposure at a given sensitive receptor within 1,000 feet of heavy equipment use would occur for less than two months. Thus, the project would not expose sensitive receptors to substantial pollutant concentrations. This impact would be less than significant.

Operational

Sources of operational TACs typically include, but are not limited to, land uses such as freeways and high-volume roadways, truck distribution centers, ports, rail yards, refineries, chrome plating facilities, dry cleaners using perchloroethylene, and gasoline dispensing facilities. The proposed project is not one of these uses. In addition, the proposed project would not require any new or additional stationary sources of air pollutant emissions. Therefore, no impact would occur.

LESS THAN SIGNIFICANT IMPACT

d. *Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?*

Valley Fever is known to occur in Ventura County soils, and exposure risk is highest from ground-disturbing agricultural and construction activities. The fungal spores responsible for Valley Fever generally grow in virgin, undisturbed soil. Soils along the project's pipeline alignment are already disturbed from construction of roadways, commercial structures, and residences, as well as

1 CARB recommends siting sensitive receptors 1,000 feet from TAC emitting sources (CARB 2005). A sensitive receptor would be exposed to the project construction approaching from 1,000 feet away and project construction located 1,000 feet away. Therefore, a sensitive receptor would be exposed for 25 days = (2,000 feet divided by 80 feet installation per day). Construction would occur on 5 working days per week.

activities associated with agricultural production. Due to the previous amount of disturbance on the project alignment, disturbance of soils during construction activities is unlikely to pose a substantial risk of infection of Valley Fever to people in the project area. Standard construction measures incorporated as part of the proposed project would reduce fugitive dust generation, which would further minimize the potential risk of infection. Therefore, construction of the proposed project would not substantially increase the risk to public health above existing background levels, and impacts related to Valley Fever would be less than significant.

Project construction could generate odors associated with heavy-duty equipment operation and earth-moving activities. Such odors would be temporary in nature and limited to the duration of construction in the vicinity of a given receptor. The proposed pipeline would be installed below ground and would not create objectionable odors during project operation. With respect to operation, CARB's *Air Quality and Land Use Handbook: A Community Health Perspective* (2005) provides recommendations regarding the siting of new sensitive land uses near potential sources of odors (e.g., sewage treatment plants, landfills, recycling facilities, biomass operations, autobody shops, fiberglass manufacturing, and livestock operations). Excess recycled water and/or brine discharge pipeline operations are not identified on this list. Therefore, the proposed project would not generate objectionable odors affecting a substantial number of people, and impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

4. Biological Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	■	□	□	□
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	■	□	□	□
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	■	□	□	□
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	■	□	□	□
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	■	□	□	□
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	□	□	□	■

a. Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

b. Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

c. Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

d. Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

e. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

The project alignment is primarily located within roadways surrounded by numerous mature trees and mature vegetation. In addition, the alignment crosses multiple waterways, including Calleguas Creek and smaller drains and barrancas. Therefore, the project alignment may be located near sensitive natural communities and/or special-status species that could potentially be significantly impacted by the proposed project. The project alignment along Tierra Rejada Road is located in critical habitat for the Coastal California gnatcatcher (*Polioptila californica californica*) as designated by the United States Fish and Wildlife Service (2022). Additionally, Moorpark Road, Sunset Valley Road, and Tierra Rejada Road are identified as wildlife corridors (County of Ventura Resource Management Agency 2022). Further review is necessary to determine if the project could potentially significantly impact special-status species, sensitive natural communities, wetlands, and wildlife movement, or conflict with biological resource policies or ordinances. Potential impacts to such biological resources will be analyzed further in a Biological Resources Assessment and an EIR for the project.

POTENTIALLY SIGNIFICANT IMPACT

f. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

The project alignment is not within an area of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan. Therefore, the project would not conflict with any such provisions, and no impact would occur.

NO IMPACT

5. Cultural Resource

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☐	☐	■
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	■	☐	☐	☐
c. Disturb any human remains, including those interred outside of formal cemeteries?	■	☐	☐	☐

At the time of this Initial Study, a Phase I Cultural Resources Study is currently being developed for the proposed project. Preliminary background research and desktop research conducted for the Phase I Cultural Resources Study was used to inform this preliminary environmental analysis.

a. Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

According to CEQA Guidelines §15064.5, a historical resource includes those listed in or determined eligible for listing in the California Register of Historical Resources or a local register of historical resources or any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant.

According to preliminary background research and aerial desktop review conducted for the Phase I Cultural Resources Study, which is in progress, three structures are situated within the pipeline corridor, which traverses public ROW and a private property. The public ROW includes Santa Rosa Road, which is depicted on historical topographic maps and aerial images dating to 1921; the Union Pacific Railroad, constructed before 1904; and the Upland Road Bridge, constructed sometime between 1986 and 1989 (NETR 2022). Preliminary research indicates none of these structures are currently historical resources pursuant to Section 15064.5(a) of the CEQA Guidelines, nor have they been subject to previous evaluation.

Although Santa Rosa Road, the Upland Road Bridge, and the Union Pacific Railroad all meet the 45-year age threshold that generally triggers the need for historical resources evaluation per the California Office of Historic Preservation, the project would not adversely impact these structures regardless of their potential historical resource eligibility. The project would involve trenching within Santa Rosa Road, but it would restore the ground surface to pre-project conditions and replace road materials in kind. The roadway has been repaved periodically since its original construction; roadway paving and restoration after pipeline installation would consist of modern materials. The project would install pipeline within an existing utility cell in the Upland Road Bridge and would not damage or substantially alter the bridge. The project would also be installed via a trenchless

construction method under the Union Pacific Railroad; however, it would not physically demolish or alter any of the physical characteristics of this linear resource.

As such, the project would not result in a substantial adverse change in the significance of any known or potential historical resource pursuant to §15064.5. No impact would occur.

NO IMPACT

b. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

The project alignment has been previously disturbed by development of existing roadways and compacted roadway shoulders. Where the project alignment crosses private property, soil has been previously disturbed due to existing agricultural activities. Despite previous development, construction activities associated with the proposed project could involve ground disturbance below the level of previous ground disturbance along the project alignment. Therefore, there is a potential for discovery of archaeological resources. These impacts are potentially significant and will be discussed further in a Cultural Resources Study and an EIR.

POTENTIALLY SIGNIFICANT IMPACT

c. Would the project disturb any human remains, including those interred outside of formal cemeteries?

The discovery of human remains is always a possibility during ground-disturbing activities, which would be required for the proposed project. Despite previous development, construction activities associated with the proposed project could involve ground disturbance below the level of previous ground disturbance along the project alignment. Therefore, there is potential for discovery of human remains. These impacts are potentially significant and will be discussed further in a Cultural Resources Study and an EIR.

POTENTIALLY SIGNIFICANT IMPACT

6. Energy

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☐	■
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	■

California has one of the lowest per capita energy use rates in the United States due to its energy efficiency programs and mild climate (United States Energy Information Administration 2022). Project operation would not require the consumption of electricity or natural gas; therefore, this analysis focuses solely on the consumption of transportation fuels consumed during construction. Gasoline, which is used by light-duty cars, pickup trucks, and sport utility vehicles, is the most used transportation fuel in California with 11.6 billion gallons sold in 2021 (California Energy Commission [CEC] 2022). Diesel, which is used primarily by heavy duty-trucks, delivery vehicles, buses, trains, ships, boats and barges, farm equipment, and heavy-duty construction and military vehicles, is the second most used fuel in California with 1.6 billion gallons sold in 2021 (CEC 2022). Table 8 summarizes the petroleum fuel consumption for Ventura County, where the project site is located, as compared to statewide consumption.

Table 8 2021 Annual Gasoline and Diesel Consumption

Fuel Type	Ventura County (millions of gallons)	California (millions of gallons)	Proportion of Statewide Consumption[1]
Gasoline	294	11,618	2.5%
Diesel	35	1,611	2.1%

[1] For reference, the population of Ventura County (833,652 persons) is approximately 2.1 percent of the population of California (39,185,605 persons) (California Department of Finance [DOF] 2022).
Source: CEC 2022

Energy consumption is directly related to environmental quality in that the consumption of nonrenewable energy resources releases criteria air pollutant and greenhouse gas (GHG) emissions into the atmosphere. The environmental impacts of air pollutant and GHG emissions associated with the project's energy consumption are discussed in detail in Environmental Checklist Section 3, *Air Quality*, and Section 8, *Greenhouse Gas Emissions*, respectively.

a. Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

During project construction, energy would be consumed in the form of petroleum-based fuels used to power off-road heavy-duty vehicles and equipment on the project site, worker travel to and from the project site, and vehicles used to deliver materials to the site. Information provided by Calleguas and the CalEEMod outputs for the air pollutant and GHG emissions modeling (Appendix A) were used to estimate energy consumption associated with the proposed project. As shown in Table 9, construction activities would require approximately 37,819 gallons of gasoline and approximately 159,762 gallons of diesel fuel. These construction energy estimates are conservative because they assume the construction equipment used in each phase of construction is operating every day of construction.

Table 9 Estimated Fuel Consumption during Construction

	Fuel Consumption (gallons)	
Source	**Gasoline**	**Diesel**
Construction Equipment & Hauling Trips	N/A	159,762
Construction Worker Vehicle Trips	37,819	N/A

N/A = not applicable

See Appendix B for energy calculation sheets.

Energy use during construction would be temporary in nature and heavy-duty equipment used would be typical of similar-sized construction projects in the region. In addition, project contractors and Calleguas staff would be required to comply with the provisions of California Code of Regulations Title 13 Sections 2449 and 2485, which prohibit diesel-fueled commercial motor vehicles and off-road diesel vehicles from idling for more than five minutes and would minimize unnecessary fuel consumption. Heavy-duty equipment would be subject to the USEPA Construction Equipment Fuel Efficiency Standard, which would also minimize inefficient, wasteful, or unnecessary fuel consumption. These practices would result in efficient use of energy necessary to perform construction of the project. In the interest of cost-efficiency, project contractors and Calleguas staff also would not utilize fuel in a manner that is wasteful or unnecessary. Therefore, construction would not involve the inefficient, wasteful, and unnecessary use of energy. No impact would occur.

Operation of the proposed project would involve vehicle trips for maintenance and inspection activities. Operation of the proposed project is anticipated to require approximately two gallons of gasoline per year for vehicle trips (Appendix B). The proposed project would operate under open channel flow, meaning the contents of the pipeline would be propelled by gravity. Project operation would not introduce new electricity demands. Thus, operation of the proposed project would also have no impact regarding the inefficient, wasteful, and unnecessary use of energy.

NO IMPACT

b. Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Calleguas has not adopted specific renewable energy or energy efficiency plans. The Ventura County Regional Energy Alliance, in partnership with the cities of Thousand Oaks and Moorpark, has prepared specific Energy Action Plans (EAPs) for Thousand Oaks, Moorpark, and remaining

jurisdictions within unincorporated Ventura County (VCREA 2023). Simi Valley and Camarillo do not have adopted EAPs. Therefore, the project is analyzed for consistency with the EAPs for unincorporated Ventura County, Thousand Oaks, and Moorpark.

As discussed above under threshold (a), project construction would not involve the inefficient, wasteful, and unnecessary use of energy, and project operation would not introduce new electricity demands. The project would have no impact regarding the wasteful or inefficient use of energy, and thus would be consistent with objectives of respective EAPs within the jurisdiction of the County of Ventura County, the City of Thousand Oaks, and the City of Moorpark.

Therefore, the project would result in no impacts to state or local energy efficiency plans.

NO IMPACT

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7. Geology and Soils

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
1. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?	☐	☐	■	☐
2. Strong seismic ground shaking?	☐	☐	■	☐
3. Seismic-related ground failure, including liquefaction?	☐	☐	■	☐
4. Landslides?	☐	☐	■	☐
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	■	☐
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☐	■
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☐	■
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	■
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	■	☐	☐	☐

a.1. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

a.2. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?

Like all of Southern California, the project site is subject to strong ground shaking associated with active and/or potentially active faults in the region. As depicted in Figure 7, the project alignment crosses the Simi-Santa Rosa fault zone, as mapped by the California DOC, in several locations, including along Upland Road, Santa Rosa Road, Sunset Valley Road, and Tierra Rejada Road (DOC 2021). The Simi-Santa Rosa fault zone is identified as an Alquist-Priolo Earthquake Fault Zone (DOC 2021). While the project may be subject to strong ground shaking in the event of an earthquake, it would not be subject to unusual levels of ground shaking as compared to the rest of the region. Although the project site is located in a seismically active area, the project would not expose people to seismically-induced risk. Proposed project activities would consist of pipeline installation and operation, which would not alter existing potential for the Simi-Santa Rosa fault zone to cause substantial adverse effects related to risk of loss, injury, or death, involving the rupture of the Simi-Santa Rosa fault zone.

The engineering design of the pipeline would consider the seismic environment and would comply with applicable seismic design standards. A portion of the Phase 3 pipeline would be installed in the deck of the Upland Road Bridge. The pipeline would be installed with seismic fittings on both ends where it enters and exits the bridge deck, allowing the pipe to move without failing during a seismic event. As discussed in Initial Study Section 9, *Project Description*, in the event an earthquake compromised any project component during operation, Calleguas would temporarily cease operations and conduct emergency repairs as soon as possible. Therefore, while the project is located within a seismically active area and would place new infrastructure in an area that could be affected by seismic activity, the project would not directly or indirectly cause potential substantial adverse effects, including risk of loss, injury, or death, involving rupture of a known earthquake fault or seismic ground shaking. Potential impacts would be less than significant.

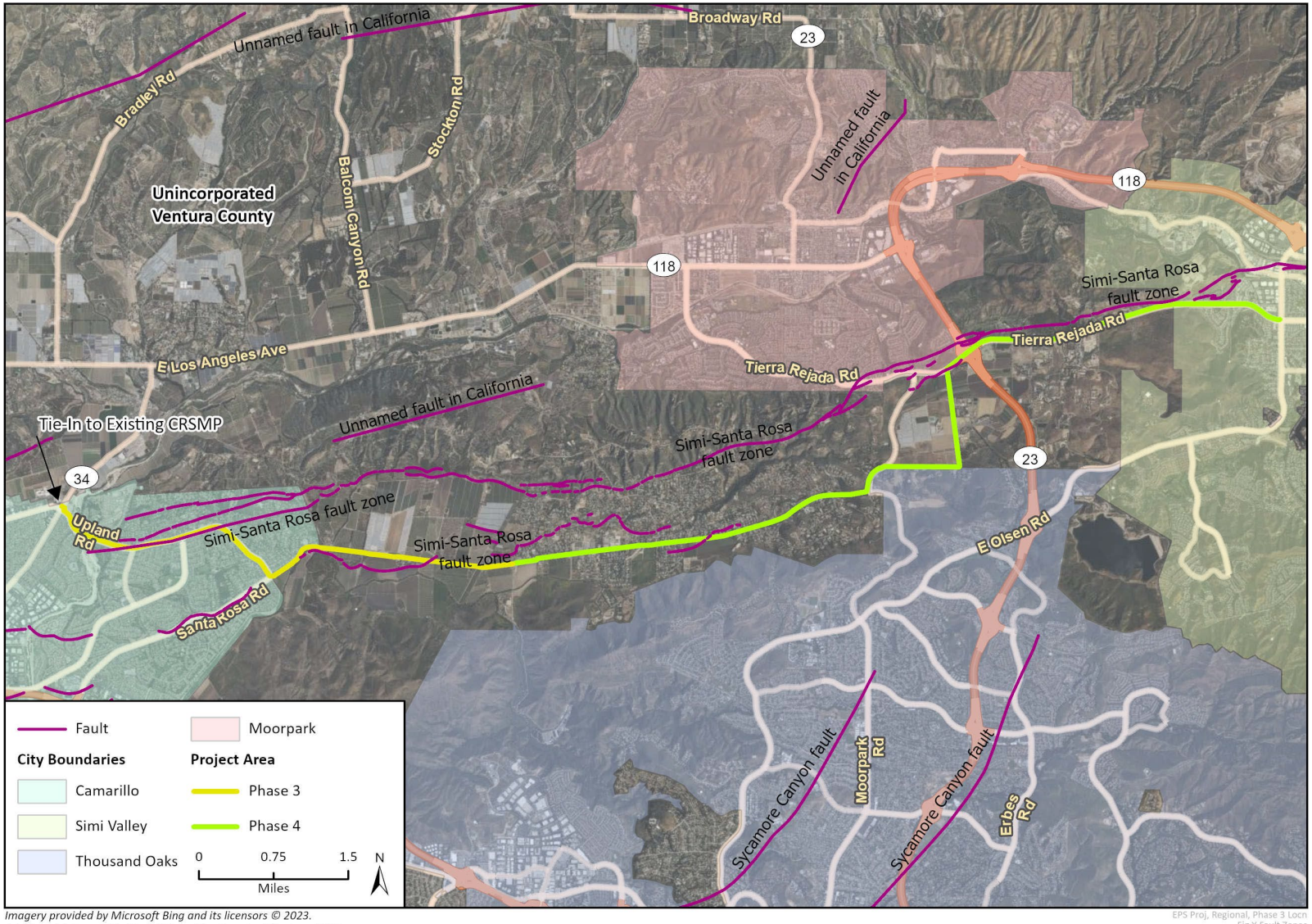
LESS THAN SIGNIFICANT IMPACT

a.3. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?

Liquefaction occurs when strong, cyclic motions during an earthquake cause water-saturated soils to lose their cohesion and take on a liquid state. Liquefied soils are unstable and can subject overlying structures to substantial damage. The project alignment along Santa Rosa Road and the adjacent hillside areas are mapped as liquefaction zones by the California DOC (DOC 2021).

As discussed under items (a.1) and (a.2), the project would comply with all applicable seismic design standards. In the event seismically-induced liquefaction compromises the pipeline during operation, Calleguas would temporarily cease operations and conduct emergency repairs as soon as possible. In addition, the project involves construction of water infrastructure and would not involve placement of habitable structures within a liquefaction-prone area, thereby minimizing the potential to result in loss, injury, or death involving seismic-related ground failure due to liquefaction. As a result, the proposed project would not directly or indirectly cause potential

Figure 7 Regional Fault Line Map with Project Alignment



substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

a.4 Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?

The project alignment is adjacent to hillside areas identified as Landslide Zones along Upland Road, Santa Rosa Road, and Tierra Rejada Road (DOC 2021). In general, a landslide event may be triggered by removing material down-slope of potentially unstable materials that would otherwise support such materials; placing fill or heavy structures upslope of potentially unstable materials; or applying substantial amounts of water to the surface or subsurface such that it decreases the strength of potentially unstable geologic areas.

The proposed project would not include habitable structures and would not expose people to loss, injury, or death involving landslides. The project alignment is located primarily within previously disturbed soil developed with existing roadways. Although portions of the project alignment are adjacent to hillside areas, the proposed project would not involve activities that would disturb or burden potentially unstable geologic areas. As discussed above, all project activities would be constructed in compliance with applicable standards for seismic integrity and safety, which includes the potential for landslides. The proposed project would not have the potential to cause substantial adverse effects involving landslides. Impacts involving landslides would be less than significant.

LESS THAN SIGNIFICANT IMPACT

b. Would the project result in substantial soil erosion or the loss of topsoil?

Soil erosion or the loss of topsoil may occur when soils are disturbed but not secured or restored, such that wind or rain events may mobilize disturbed soils, resulting in their transport off the project alignment. Construction of the proposed pipeline would primarily require trenching within existing paved roadways, which have been previously disturbed. As the proposed project's disturbance area is greater than one acre, the project would be required to comply with the NPDES General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (typically called the Construction General Permit). The Construction General Permit requires development and implementation of a project-specific Stormwater Pollution Prevention Plan (SWPPP). Implementation of the SWPPP would minimize the amount of sediment and other pollutants associated with construction sites that are discharged in stormwater runoff, through BMPs to control erosion and sedimentation. Such BMPs typically include the use of stabilized construction entrances and exits, construction vehicle maintenance in staging areas to avoid leaks, and installation of silt fences and erosion control blankets. BMPs required by the SWPPP would be included in the design of the project and do not serve as mitigation measures.

No substantial erosion or loss of topsoil would occur from pipeline operation because the project would restore ground surfaces to pre-project conditions and would implement BMPs designed to control erosion and sedimentation. Impacts regarding substantial soil erosion or the loss of topsoil would be less than significant.

LESS THAN SIGNIFICANT IMPACT

c. Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

d. Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Unstable soils are those soils which are physically unsuitable to support buildings, roads, utilities, or other development-related improvements, or which have the potential for slope failure, erosion, or subsidence. Expansive soils are those soils which can undergo substantial changes in volume (i.e., shrink-or-swell potential), due to variations in moisture content.

Although the proposed project would be located in a seismically active area, the project is not anticipated to adversely affect soil stability or increase the potential for local or regional landslides or liquefaction. During construction, trench spoils would be temporarily stockpiled within the construction staging and storage area, then used to backfill the trench after pipeline placement; backfilling would be conducted to meet proper compaction requirements. Depending on applicable requirements at the time of construction, slurry backfill may be used. The project would not include habitable structures and would therefore not create substantial direct or indirect risks to life or property beyond existing conditions.

The project would not compromise soil stability and there would be no impact involving unstable or expansive soils.

NO IMPACT

e. Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

The proposed project would not include the use of septic tanks or alternative wastewater disposal systems. No impact would occur.

NO IMPACT

f. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Paleontological resources, or fossils, are the evidence of once-living organisms preserved in the rock record. They include both the fossilized remains of ancient plants and animals and the traces thereof (e.g., trackways, imprints, burrows). Paleontological resources are not found in "soil" but are contained within the geologic deposits or bedrock that underlies the soil layer. Typically, fossils are greater than 5,000 years old (i.e., older than middle Holocene in age) and are typically preserved in sedimentary rocks. Although rare, fossils can also be preserved in volcanic rocks and low-grade metamorphic rocks under certain conditions (Society of Vertebrate Paleontology [SVP] 2010). Fossils occur in a non-continuous and often unpredictable distribution within some sedimentary units, and the potential for fossils to occur within sedimentary units depends on several factors. It is possible to evaluate the potential for geologic units to contain scientifically important paleontological resources, and therefore evaluate the potential for impacts to those resources and provide mitigation for paleontological resources if they are discovered during construction.

According to the SVP (2010) classification system, geologic units can be assigned a high, low, undetermined, or no potential for containing scientifically significant nonrenewable paleontological

resources. This criterion is based on rock units within which vertebrate or significant invertebrate fossils have been determined by previous studies to be present or likely to be present. The potential for impacts to significant paleontological resources is based on the potential for ground disturbance to directly impact paleontologically sensitive geologic units. Based on published geologic maps, Rincon assessed whether high sensitivity geologic units potentially underlie the project alignment.

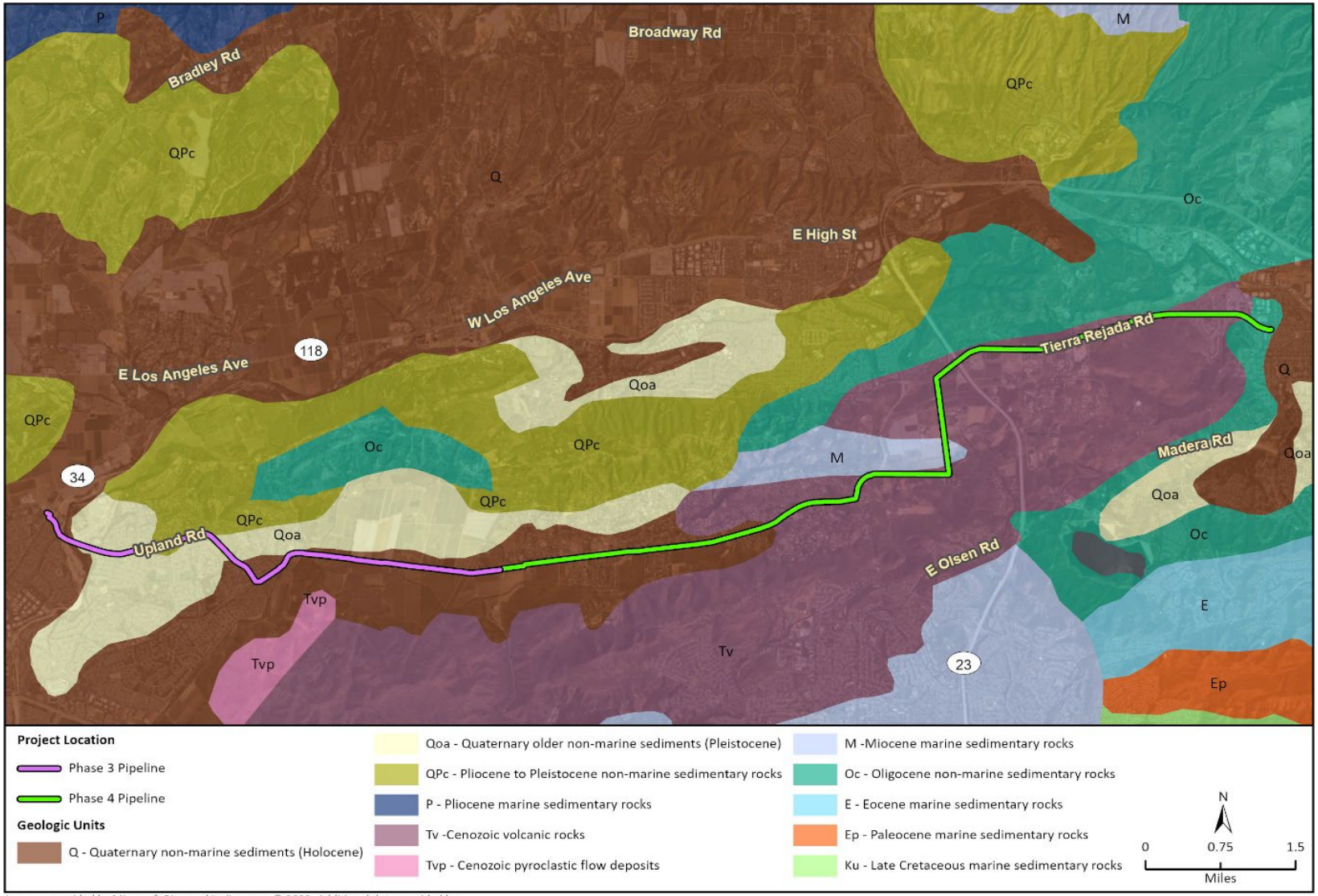
According to the geologic map of Jennings et al. (2010), the project alignment is underlain by marine and non-marine sedimentary rocks from Holocene, Pleistocene, Pliocene, Miocene, and Oligocene age (i.e., late Cenozoic) and volcanic rocks of Cenozoic age.

Figure 8 shows the pipeline alignment and underlying geologic units. Volcanic rocks have no paleontological sensitivity because the nature of their formation, being formed from cooling molten rock, generally precludes fossil preservation. Late Cenozoic marine and non-marine sedimentary rocks have produced significant paleontological resources throughout California (Jefferson 2010; Paleobiology Database 2022), but specific geologic formations have different potentials to produce such resources due to their various ages and lithologies. Therefore, further analysis is needed to assess the paleontological sensitivity of the late Cenozoic marine and non-marine sedimentary rocks underlying the project alignment.

Considering the proposed project alignment is underlain by late Cenozoic marine and non-marine sedimentary rocks which may have high paleontological sensitivity, impacts to paleontological resources may be potentially significant. This impact will be further analyzed in the EIR for the project.

POTENTIALLY SIGNIFICANT IMPACT

Figure 8 Regional Geology Map with Project Alignment



Imagery provided by Microsoft Bing and its licensors © 2022. Additional data provided by Jennings et al. "Geologic Map of California," 2010.

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8. Greenhouse Gas Emissions

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	■	☐
b. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	■	☐

a. Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?

b. Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

This analysis evaluates the proposed project against the goals of the 2017 Scoping Plan. Approximately 2 percent of total energy usage in California is used for the conveyance, treatment, and distribution of water (CARB 2017). One of the goals of the 2017 Scoping Plan is to "develop and support more reliable water supplies for people, agriculture, and the environment, provided by a more resilient, diversified, sustainably managed water resources system with a focus on actions that provide direct GHG reductions" (CARB 2017). The proposed project would facilitate the utilization of local water sources by providing a mechanism to efficiently dispose of the concentrate generated during treatment of these water sources. Therefore, although the project would generate temporary construction and minimal operational emissions, the project would ultimately be consistent with the goals of CARB's 2017 Scoping Plan.

The proposed project would not conflict with any applicable plans, policies, or regulations for the purpose of reducing GHG emissions. Therefore, impacts related to GHG emissions would be less than significant.

Project construction would generate minimal GHG emissions from the operation of heavy machinery for the pipeline, and equipment and materials haul truck trips and construction worker trips to and from the project site. Construction GHG emissions were estimated using CalEEMod version 2020.4.0. Operation of the proposed project would generate GHG emissions associated with the area and mobile sources, such as off-gassing of paved roads and pipeline maintenance and inspection trips. The pipeline itself would not generate new demand for electricity, water supply, or natural gas. Maintenance activities would occur annually from the District's office along the pipeline alignment. Quantification of GHG emissions from construction and operational activities are provided for informational purposes.

Construction Emissions

As shown in Table 10, construction of the proposed project would generate an estimated total of 1,784 metric tons (MT) of carbon dioxide equivalent (CO_2e).[2] The Association of Environmental Professionals (2016) recommends GHG emissions from construction be amortized over 30 years[3] and added to operational GHG emissions to determine the overall impact of a project. The construction of the proposed project would generate an estimated 59 MT CO_2e per year over a 30-year period.

Table 10 Estimated Construction Emissions of Greenhouse Gases

Construction	Project Emissions MT CO_2e
Construction Emissions	
Phase 3	
2024	354
2025	292
Phase 4	
2025	183
2026	483
2027	437
2028	35
Total Construction Emissions	**1,612**
Amortized Construction Emissions (over 30 years)	**59**

MT CO_2e = metric tons of carbon dioxide equivalent
Source: Appendix A CalEEMod worksheets

Table 11 combines the estimated construction and operational GHG emissions associated with development of the project. Operation of the project would generate an estimated one maintenance vehicle trip per year, resulting in negligible annual mobile GHG emissions. As shown in Table 11, annual emissions from the proposed project would be approximately 59 MT of CO_2e per year with amortized construction emissions. Impacts related to GHG emissions would be less than significant.

2 A carbon dioxide equivalent (CO_2e) is a measurement used to compare the emissions from various GHGs by converting amounts of other gases to the equivalent amount of carbon dioxide with the same global warming potential.
3 The lifetime of the project is anticipated to be longer than 30 years; therefore, the analysis is conservative.

Table 11 Combined Annual Emissions of Greenhouse Gases

Emission Source	Annual Emissions (MT CO_2e)
Construction[1]	**59**
Operations Phase 3	
Area	<1
Energy	<1
Mobile	<1
Solid Waste	<1
Water, Wastewater	<1
Operations Phase 4	
Area	<1
Energy	<1
Mobile	<1
Solid Waste	<1
Water, Wastewater	<1
Total	**59**

MT CO_2e = metric tons of carbon dioxide equivalent
[1] Amortized construction related GHG emissions over 30 years
Source: Appendix A CalEEMod worksheets.

LESS THAN SIGNIFICANT IMPACT

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9. Hazards and Hazardous Materials

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	■	☐
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	■	☐
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?	☐	☐	■	☐
d. Be located on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	■	☐
e. For a project located in an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	■
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	■	☐
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	☐	☐	■	☐

a. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction of the proposed project would temporarily increase the transport and use of hazardous materials along the project alignment through the operation of vehicles and equipment, consistent with other pipeline construction projects in the region. Such substances include diesel fuel, oil, solvents, and other similar materials brought onto the construction site for use and storage during the construction period. These materials would be contained within vessels specifically engineered for safe storage and would not be transported, stored, or used in quantities which would pose a significant hazard to the public or construction workers. Furthermore, project construction would require the excavation and transport of paving materials and soils which could possibly be contaminated by vehicle-related pollution (e.g., oil, gasoline, diesel, and other automotive chemicals). All such paving and soils removed during construction would be transported and disposed of in accordance with applicable codes and regulations to minimize potential hazards to construction workers and the surrounding community.

Operation of the proposed project would involve the conveyance of brine concentrate and excess recycled water and would not require the use, storage, or disposal of hazardous materials. The contents of the Phases 3 and 4 pipeline alignments would be similar to the contents of the existing CRSMP. Therefore, the proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

b. Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

The use, transport, and storage of hazardous materials during construction of the proposed project (e.g., diesel fuel, oil, solvents, and other similar materials) could introduce the potential for an accidental spill or release to occur. As discussed under item (a), operation and maintenance of the project would not involve the routine transport, use, or disposal of hazardous materials. Therefore, potential impacts are limited to the construction period.

The presence of hazardous materials during project construction activities could result in an accidental upset or release of hazardous materials if they are not properly stored and secured. However, hazardous materials used during project construction would be disposed of off-site in accordance with all applicable laws and regulations. Additionally, the proposed project would adhere to BMPs required by the SWPPP, which include hazardous material management measures. Therefore, construction impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

c. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?

The nearest school to the project alignment is Santa Rosa Technology Magnet School, located immediately adjacent to the project alignment on Santa Rosa Road in unincorporated Ventura County. As discussed above for item (a), potential impacts of project construction associated with the routine transport, handling, and use of hazardous materials would be less than significant. In addition, BMPs included as part of the project would minimize the potential for an accidental spill or

release of hazardous or potentially hazardous materials to result in adverse impacts. The proposed project would not introduce a new stationary source of hazardous emissions, and operation of the project would not require the handling of hazardous materials, substances, or waste. Emissions from project construction would be limited to those associated with the operation of construction vehicles and equipment, which are addressed under Environmental Checklist Section 3, *Air Quality,* and Section 8, *Greenhouse Gas Emissions*, and would be less than significant.

Although project construction activities would involve the routine transport, handling, and use of hazardous materials within 0.25 mile of an existing school, those materials would be consistent with other standard pipeline construction projects in the region, and BMPs would be implemented to minimize associated risks. Potential impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

d. Would the project be located on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Government Code Section 65962.5 requires the California Environmental Protection Agency to develop an updated Hazardous Waste and Substances Sites List, also known as the Cortese List. The California Department of Toxic Substances Control (DTSC) is responsible for a portion of the information contained in the Cortese List; other state and local government agencies are also required to provide additional hazardous material release information for the Cortese List. The analysis for this section included a review of the following resources on October 11, 2022, to provide hazardous material release information:

- SWRCB GeoTracker database (SWRCB 2022a)
- DTSC EnviroStor database (DTSC 2022)

Based upon review of these databases, there are no active hazardous material sites mapped along or in the vicinity of the project alignment. According to GeoTracker's interactive mapping platform, there are five closed Leaking Underground Storage Tank (LUST) cleanup sites mapped within the project alignment within Santa Rosa Road and Tierra Rejada Road. Although GeoTracker's interactive mapping platform locates these points within the roadways, the LUST cleanup sites themselves are likely associated with land uses adjacent to and outside of the roadways, with the site points coarsely mapped at the facility site address along the roadway.

Table 12 identifies each LUST site mapped within the project alignment. Where site-specific mapping was available through GeoTracker, the table also identifies the location of the underground tank(s) in relation to the roadway.

Table 12 Hazardous Material Sites Mapped Within Project Alignment

GeoTracker Site Name/Number	Site Address	Site Type (Potential Contaminant of Concern)	Cleanup Status	Site-Specific Mapping Notes
Camrosa Water District[1] (T0611100153)	7385 Santa Rosa Road, Camarillo, CA 93010	LUST Cleanup Site (Diesel)	Completed – Case Closed as of 6/6/1990	The underground tank was located north of the existing building at the Camrosa Water District site, approximately 150 feet north of Santa Rosa Road.[2]
Hill Canyon Treatment Plant[3] (T061113035)	9600 Santa Rosa Road, Camarillo, CA 93012	LUST Cleanup Site (Diesel)	Completed – Case Closed as of 6/2/2004	The underground storage tanks were located at the Hill Canyon Treatment Plant, which is situated approximately 1.5 miles south of Santa Rosa Road.[4]
Nicholson Property[5] (T0611113948)	11226 Santa Rosa Road, Camarillo, CA 93012	LUST Cleanup Site (Gasoline)	Completed – Case Closed as of 11/7/2005	The underground tank was situated outside the roadway on the adjacent property, approximately 200 feet south of Santa Rosa Road.[6]
Santa Rosa School[7] (T0611100715)	13282 Santa Rosa Road, Camarillo, CA 93012	LUST Cleanup Site (Gasoline)	Completed – Case Closed as of 7/22/1996	Underground tanks were located on the Santa Rosa School site, approximately 120 feet southeast of Santa Rosa Road.[8]
ARCO #6119[9] (T0611100327)	25 Tierra Rejada Road, Simi Valley, CA 93065	LUST Cleanup Site (Gasoline)	Completed – Case Closed as of 4/12/2010	The tanks were located outside of the roadway, at the ARCO gas station on the corner of Tierra Rejada Road and Madera Road.

[1] SWRCB 2022b
[2] Ventura County Resource Management Agency 1990
[3] SWRCB 2022c
[4] SWRCB 2004a
[5] SWRCB 2022d
[6] SWRCB 2004b
[7] SWRCB 2022e
[8] Ventura County Resource Management Agency 1996
[9] SWRCB 2022f

As shown in Table 12, all five LUST sites have the status "Completed—Case Closed," indicating applicable regulatory requirements were met at the time of closure. In addition, site-specific mapping from closure records confirmed the underground tanks were all located outside of Santa Rosa Road.

As such, the proposed project would not create a significant hazard to the public or the environment due to these listed cleanup sites. Impacts would be less than significant. Therefore, proposed project impacts regarding hazardous materials sites compiled pursuant to Government Code Section 65962.5 would be less than significant.

LESS THAN SIGNIFICANT IMPACT

e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

The project alignment is not located within an airport land use plan or within two miles of a public or private airport (Ventura County Airport Land Use Commission 2000). The nearest airport is the Camarillo Airport, approximately 4.6 miles to the southwest of the alignment at its closest point. As a result, the proposed project would have no impact related to safety hazards for people residing or working in the project area due to proximity to an airport.

NO IMPACT

f. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Proposed pipeline construction would mostly occur within the existing roadways of Upland Road, Santa Rosa Road, Read Road, Sunset Valley Road, Moorpark Road, and Tierra Rejada Road. A portion of the pipeline would be constructed on private property in the northeast corner of the intersection of Upland Road and Las Posas Road. Other than a short segment of the alignment along Santa Rosa Road and in front of certain driveways requiring flagger-controlled traffic controls, a minimum of one lane of traffic in each direction would be open during project construction. Construction phasing across arterial roads and driveways would be implemented to maintain access. Properties with multiple driveways and access points would have only one driveway closed at a time to maintain access to the property.

City and County General Plan Safety Elements do not identify roadways along the project alignment to be major evacuation routes. In addition, traffic control plans would be prepared as part of the encroachment permitting process. Impacts related to emergency response plans and emergency evacuation plans during project construction would be less than significant.

Project operation and maintenance would not introduce new activities that could impede or interfere with emergency plans. Therefore, no impact related to emergency response plans and emergency evacuation plans during project operation would occur.

LESS THAN SIGNIFICANT IMPACT

g. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

Portions of the project alignment along Upland Road, Moorpark Road, Read Road, and Tierra Rejada Road are located in Local Responsibility Areas designated as Very High Fire Hazard Severity Zones (California Department of Forestry and Fire Protection [CAL FIRE] 2022).

Project construction would involve the use of heavy equipment and machinery along the project alignment, portions of which are near vegetated hillside areas. However, the project would comply with regulations related to fire hazards and wildfire safety, including mandatory use of spark arrestors (PRC Section 4442), maintenance of fire suppression equipment during the highest fire danger period (PRC Section 4428), and adherence to standards for conducting construction activities on days when a burning permit is required (PRC Sections 4427 and 4431). Therefore, although portions of the project alignment are located within an area susceptible to wildfire, the proposed project would not increase fire risks on the project alignment or surrounding areas. Potential construction impacts associated with wildland fire would be less than significant.

Following the completion of project construction, operational activities would not pose a substantial risk of wildfire ignition. No operational impact would occur.

LESS THAN SIGNIFICANT IMPACT

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10. Hydrology and Water Quality

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	■	☐
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	■	☐
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
(i) Result in substantial erosion or siltation on- or off-site;	☐	☐	■	☐
(ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	■	☐
(iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	■	☐
(iv) Impede or redirect flood flows?	☐	☐	☐	■
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	■	☐
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	■	☐

The federal Clean Water Act establishes the framework for regulating discharges to waters of the U.S. in order to protect their beneficial uses. The Porter-Cologne Water Quality Act (Division 7 of the California Water Code) regulates water quality within California and establishes the authority of the SWRCB and the nine Regional Water Quality Control Boards (RWQCBs). The RWQCBs and SWRCB issue NPDES permits to regulate specific water discharges, including a Construction General Permit for projects that disturb more than one acre, and the discharge permit for the Hueneme Outfall to the CRSMP.

a. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

The project site is located in the South Coast hydrological region (California Department of Water Resources [DWR] 2022a). The project alignment crosses Calleguas Creek, St. John's Drain, Upland Road Drain, Quito Drain, Camrosa Drain, Hilltop Lane Drain, Barbara Drive Drain, Santa Rosa Creek, and Sycamore Canyon Creek. Trenchless construction methods would be used to cross below existing drainage channels.

Excavation, grading, and construction activities associated with project construction would result in soil disturbance. As stormwater flows over a construction site, it can pick up sediment, debris, and chemicals, and transport them to receiving water bodies. The proposed project would require coverage under the Construction General Permit and development and implementation of a SWPPP. The SWPPP would minimize the amount of sediment and other pollutants associated with the construction site discharged in stormwater runoff (SWRCB 2023). As such, the proposed project would be consistent with water quality standards and waste discharge requirements. As discussed in the impact analyses for Environmental Checklist Section 7, *Geology and Soils*, and Environmental Checklist Section 9, *Hazards and Hazardous Materials,* implementation of SWPPP BMPs would minimize or avoid potentially adverse impacts, including those associated with earthwork activities that could lead to water quality degradation. Therefore, project construction activities would not substantially degrade surface water quality.

The CRSMP was designed to manage the use of high salinity surface water and groundwater, dispose of the brine produced by enhanced water treatment, and facilitate the development of water sources otherwise unavailable due to poor water quality. The proposed project would extend the CRSMP inland, enabling an expansion of its use. Similar to the original project, by collecting and disposing of high salinity concentrate, the proposed project would result in a beneficial impact to freshwater surface and groundwater quality in the region.

The CRSMP has an existing NPDES permit for ocean outfall discharges associated with the pipeline (NPDES CA0064521), which would also cover discharges that enter the CRSMP in Phases 3 and 4. Each individual discharger would be required to comply with the water quality criteria pollutant limitations in the NPDES permit for the ocean outfall. As a result, the proposed project would not exceed the limitations in the existing NPDES permit, and would not substantially degrade water quality in the Pacific Ocean at the outfall location. Therefore, no adverse operational impact would occur.

LESS THAN SIGNIFICANT IMPACT

b. Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

e. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

In September 2014, the California Legislature enacted comprehensive legislation aimed at strengthening local control and management of groundwater basins throughout the state. Known as the Sustainable Groundwater Management Act (SGMA), the legislation provides a framework for sustainable management of groundwater supplies by local authorities, with a limited role for State intervention when necessary to protect the resource. The project alignment extends over the Pleasant Valley Groundwater Basin (Basin #4-006), the Arroyo Santa Rosa Valley Groundwater Basin (Basin #4-007), and the Tierra Rejada Groundwater Basin (Basin #4-015) (DWR 2022b). The Arroyo Santa Rosa Valley and Tierra Rejada Groundwater Basins are designated as "very low priority" and are therefore not required by SGMA to be managed by a Groundwater Sustainability Agency through implementation of a Groundwater Sustainability Plan (DWR 2022b). The Pleasant Valley Groundwater Basin is designated as a "high priority" basin and is managed by the Pleasant Valley Groundwater Sustainability Agency (DWR 2022b).

If groundwater dewatering is required based on site conditions, the project would adhere to applicable rules and regulations related to discharge. Depending on the quality of the dewatered groundwater, water could be trucked off-site for reuse for dust control and irrigation. Dewatering during project construction would not substantially decrease groundwater supplies or degrade water quality. Construction of the proposed pipeline would not increase impervious surfaces along the pipeline alignment because ground surfaces would be restored to pre-project conditions. Therefore, the project would not substantially interfere with groundwater recharge occurring along the project alignment. Potential impacts would be less than significant.

During operation, the pipeline would convey brine and excess recycled water. As discussed in Initial Study Section 8, *Description of Project*, the CRSMP is intended to facilitate the utilization of surface water and groundwater sources otherwise unavailable due to poor water quality. As discussed in Environmental Checklist Section 14, *Population and Housing*, the proposed project would facilitate the use of water supplies currently identified in planning documents such as UWMPs, and there would be no significant impacts related to substantial unplanned population growth. The proposed project would not introduce a demand for groundwater supplies, and any new infrastructure associated with new dischargers (e.g., groundwater desalters, wastewater treatment facilities) would be subject to separate CEQA review. As such, the proposed project would not impede sustainable groundwater management, or conflict with a water quality control plan. Potential impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

c.(i) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site?

c.(ii) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

c.(iii) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

The proposed project would not alter the course of a stream or river and would not introduce new impervious surfaces that could result in substantial erosion, siltation, or flooding on or off the site. Construction of the pipeline would not increase impervious surfaces along the project alignment because the pipeline would be mostly installed under existing roadways, other than the portion of alignment that would extend through private property at the northeastern corner of the Upland Road and Las Posas Road intersection. When crossing through private property, the proposed project would restore the site to pre-project conditions following completion of construction activities, and thus would not add impervious surfaces. Therefore, pipeline construction would not alter the existing drainage pattern along the project alignment as compared to existing conditions.

In addition, as discussed for threshold (a) above, the project would not result in water quality degradation as the project would not introduce a source of polluted runoff. The proposed project would not exceed the capacity of existing or planned stormwater drainage systems and would not provide substantial additional sources of polluted runoff. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

c.(iv) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows?

As discussed above for thresholds (c.ii) and (c.iii), potential impacts related to drainage pattern alterations from the proposed project would be less than significant. The proposed project would not substantially alter existing drainage patterns along project alignment or in the surrounding area as the proposed project would not increase impervious surface area or alter the course of a stream or river. The project would restore roadways along the project alignment to pre-project conditions upon completion of construction. No impact would occur.

NO IMPACT

d. In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

The project alignment is located approximately 11 miles inland (measured by the nearest proposed pipeline segment to the Pacific Ocean) and is not in a tsunami inundation zone (DOC 2022). The nearest large surface water body is Lake Bard, located approximately 1.3 miles southeast of the

project alignment's intersection at Read Road and Sunset Valley Road. In the event of a dam failure at Lake Bard, the easternmost portion of the Phase 4 alignment and westernmost portion of the Phase 3 alignment would be inundated (Calleguas 2019). In addition, portions of the project alignment along Upland Road, Santa Rosa Road, Sunset Valley Road, and Tierra Rejada Road are located in Special Flood Hazard Areas as designated by the Federal Emergency Management Agency (FEMA) (FEMA 2022).

An extreme flood event could inundate the area where the project alignment occurs, but the underground pipeline would be unaffected. Furthermore, implementation of spill response BMPs from the project's SWPPP would provide a rapid clean-up of any accidentally released materials to prevent pollutant release in a subsequent storm or flooding event. Therefore, the project alignment would not be subject to potential inundation and would not risk release of pollutants due to inundation. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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11. Land Use and Planning

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	☐	☐	☐	■
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	■

a. Would the project physically divide an established community?

The proposed pipeline would be located entirely below the ground surface, primarily within existing roadway public ROW. A portion of the project alignment would extend through private property located at the northeastern corner of the intersection of Upland Road and Las Posas Road. This private property is currently designated as Agriculture and zoned as Rural Exclusive Residential by the City of Camarillo. The site would be restored to pre-project conditions once construction has completed, and the proposed pipeline would be located underground. The proposed project would not have the potential to physically divide an established community. No impact would occur.

NO IMPACT

b. Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Per California Government Code Section 53091, building and zoning ordinances of a county or city do not apply to the location or construction of facilities for the production, storage, or transmission of water, wastewater, or electrical energy by a local agency. The proposed project would extend the pre-existing CRSMP, and is thus exempt from local building and zoning ordinances. In addition, the proposed pipeline would be constructed entirely underground, primarily below existing roadway ROW, and would not change surface land uses along the project alignment.

The project would be in furtherance of General Plan goals and policies from respective jurisdictions along the project alignment that pertain to water supply reliability and wastewater infrastructure. Applicable goals and policies are identified below:

City of Camarillo

- **Health Policy:** The city will protect the watershed, groundwater sources, freshwater treatment, storage and distribution system, and wastewater collection and treatment system from contamination and damage.

City of Thousand Oaks

- **Policy CO-17:** Continue to ensure the provision of water in quantities sufficient to satisfy current and projected demand.

City of Moorpark

- **Policy 4.2:** Conserve and protect water quality supplies through cooperative efforts with the Ventura County Water Conservation Plan and any future regional water quality and water supply plans and programs that may be instrumental in reducing water quality-related problems.

City of Simi Valley

- **Policy NR-4.8: Infrastructure Upgrades:** Continue to upgrade the City's water infrastructure to minimize water leakage and ensure adequate supply for residents and businesses.

County of Ventura

- **Policy WR-C: Regional Collaboration on Water Issues and Sustainability:** The County shall continue to provide data and staff resources to support collaboration on climate change and sustainability, and for planning and implementing projects that address local and regional water issues.

The proposed project would enable development of local water supplies such as treated groundwater and recycled water, thereby reducing the region's reliance on imported water supplies. As such, the project would represent an improvement to the region's water infrastructure and regional supply reliability.

The proposed project would be consistent with the goals and policies outlined in the Ventura County 2040 General Plan, City of Camarillo General Plan, City of Thousand Oaks General Plan, City of Moorpark General Plan, and City of Simi Valley General Plan. The proposed project would not conflict with land use plans, policies, or regulations, and no impact would occur.

NO IMPACT

12. Mineral Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	■
b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	■

a. Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

b. Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

Mineral resources in Ventura County consist of aggregate resources, more commonly known as construction grade sand and gravel, as well as petroleum resources in the form of oil and gas deposits. The project alignment is adjacent to Mineral Resource Zones known or inferred to have mineral deposits, as identified by the State Geologist (County of Ventura 2020).

The proposed project would not involve mineral extraction or changes in land use that could affect the availability of mineral resources. The proposed project would not require a supply of mineral resources beyond sand and gravel used to conduct road resurfacing and provide fill materials. Therefore, the project would not result in the loss of availability of a known mineral resource or a locally important mineral resource recovery site. No impact would occur.

NO IMPACT

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13. Noise

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	■	□	□	□
b. Generation of excessive groundborne vibration or groundborne noise levels?	■	□	□	□
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	□	□	□	■

Project Noise Setting

Noise exposure goals for various types of land uses reflect the varying noise sensitivities associated with those uses. Along the project alignment, noise-sensitive land uses are generally considered to include residences, schools, hospitals and care facilities, recreation and open space areas, hotels and motels, and places of worship (City of Moorpark 1998; City of Thousand Oaks 2000; City of Simi Valley 2012; City of Camarillo 2015; County of Ventura 2020).

a. *Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*

The proposed project would generate temporary noise increases during construction. Nearby noise sensitive receptors include single-family residences surrounding the project alignment along Upland Road and Tierra Rejada Road, the Santa Rosa Technology Magnet School located along Santa Rosa Road, and Strathearn Historical Park on Tierra Rejada Road. Potential noise sources from ground disturbance, installation, and paving activities of the project would be associated with construction vehicles and operation of construction machinery that could result in noise levels above applicable standards. Therefore, impacts associated with construction of the proposed project may be potentially significant and will be analyzed further in an EIR.

POTENTIALLY SIGNIFICANT IMPACT

b. *Would the project result in generation of excessive groundborne vibration or groundborne noise levels?*

The proposed project would involve standard construction activities that would generate vibration that may exceed applicable standards at single-family residences surrounding the project alignment along Upland Road and Tierra Rejada Road, the Santa Rosa Technology Magnet School located along Santa Rosa Road, and Strathearn Historical Park on Tierra Rejada Road. Impacts may be potentially significant and will be analyzed further in an EIR.

POTENTIALLY SIGNIFICANT IMPACT

c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

The airport nearest to the project site, Camarillo Airport, is located approximately 4.6 miles to the southwest. The project site is not located within the airport land use plan (Ventura County Land Use Commission 2000). Therefore, no substantial noise exposure from airport noise would occur to construction workers and no impact would occur.

NO IMPACT

14. Population and Housing

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?	☐	☐	■	☐
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	■

a. Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

The proposed project would involve extension of an existing brine and excess recycled water pipeline. No direct growth would occur as a result of the project because it does not propose new homes, businesses, or other land uses that would generate population growth.

The proposed project would extend the CRSMP inland to connect to additional dischargers. The project would facilitate the treatment and use of local water supplies which are currently unusable due to brine concentrate discharge obstacles. As discussed in the 2014 SEIR for Phase 2 of the CRSMP, any additional water supply projects facilitated by the extended CRSMP would improve the reliability of local water supplies and reduce the region's reliance on imported supplies. These projects have likely been identified already in planning documents such as UWMPs. For example, Camrosa Water District's 2020 UWMP identifies a potential groundwater desalter project to treat for nitrates in the Santa Rosa Basin. If developed, the desalter would discharge brine from the treatment process to the CRSMP. According to the UWMP, the purpose of the desalter would be to improve water quality in the Santa Rosa Basin and increase Camrosa Water District's self-reliance (Camrosa Water District 2021). As discussed in Environmental Checklist Section 3, *Air Quality,* the project would not generate population, housing, or employment growth exceeding the forecasts used in the development of the 2016 Ventura County AQMP.

Impacts related to substantial unplanned population growth would be less than significant.

LESS THAN SIGNIFICANT IMPACT

b. Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

The proposed project would construct an underground pipeline. Ground surfaces would be restored to pre-project conditions. The proposed project would not demolish existing housing or displace

existing people, and would not necessitate the construction of replacement housing. No impact would occur.

NO IMPACT

15. Public Services

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
1. Fire protection?	☐	☐	☐	■
2. Police protection?	☐	☐	☐	■
3. Schools?	☐	☐	☐	■
4. Parks?	☐	☐	☐	■
5. Other public facilities?	☐	☐	☐	■

a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

a.1. Fire protection?

a.2. Police protection?

a.3. Schools?

a.4. Parks?

a.5. Other public facilities?

As listed above, for the purposes of this analysis, public services include fire and police protection, as well as schools, parks, and other public facilities such as libraries and community-based resources. As discussed in Environmental Checklist Section 14, *Population and Housing*, the proposed project would not induce population growth. Considering the proposed project would not increase population, it also would not increase existing demands for public facilities, including parks and schools. The proposed project would not introduce any features or facilities requiring additional or unusual fire or police protection or response. The proposed project would not change existing

demand for fire or police protection services because it would not cause or contribute to population growth and would not introduce new land use designations along the project alignment. No impact would occur.

NO IMPACT

16. Recreation

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	■	☐
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	■

a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

The project alignment on Tierra Rejada Road is located adjacent to Stargaze Park and Strathearn Historical Park in Simi Valley, and is visible from both of these parks as well as Tierra Rejada Park in Moorpark (City of Simi Valley 2012; County of Ventura 2020). Construction activities would result in short-term, temporary impacts to recreational users through the introduction of construction noise and dust. Such impacts may result in people avoiding parks along the project alignment in favor of other local parks. As the project is a linear construction project, and an estimated 80 feet of pipeline would be installed each day, impacts from construction at any one point along the alignment would be short-term and evenly distributed along the project alignment. Overall construction impacts would be temporary and limited to the construction period, and are not anticipated to substantially increase the use of other existing neighborhood and regional parks or other recreational facilities. As such, the project would not increase use of recreational facilities such that substantial deterioration of the facilities would occur. Construction-related impacts to recreational facilities would be less than significant.

Upon completion of construction, the project would consist of an underground pipeline. No operational impact would occur.

LESS THAN SIGNIFICANT IMPACT

b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

As discussed in Environmental Checklist Section 14, *Population and Housing*, the project would not induce population growth or directly increase the use of existing neighborhood and regional parks or other recreational facilities. The proposed project does not include recreational facilities, nor does it require the construction or expansion of recreational facilities. No impact would occur.

NO IMPACT

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17. Transportation

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	■	□	□	□
b. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	□	□	□	■
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?	□	□	□	■
d. Result in inadequate emergency access?	□	□	■	□

a. Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Construction of the proposed project would temporarily increase traffic associated with project roadways. Project-generated traffic during construction would include worker-related commuter trips, trucks used for delivering construction equipment, and trucks used for delivering and hauling construction materials and wastes. Trenchless construction methods would be used to cross Somis Road, Santa Rosa Road, and busy intersections to minimize traffic impacts. However, lane closures during pipeline construction activities would be necessary. Project construction would result in temporary disruption to the existing circulation system.

As described in Initial Study Section 9, *Project Description*, other than a short segment of alignment along Santa Rosa Road and in front of certain driveways requiring flagger-controlled traffic controls, a minimum of one lane of traffic in each direction would be open during project construction. Construction phasing across arterial roads and driveways would be implemented to maintain access across these locations. Properties with multiple driveways and access points would have only one driveway closed at a time to maintain access to the property. In addition, traffic control plans would be prepared as part of the encroachment permitting process for all work within the public ROW.

Project-generated traffic during operation would be limited to annual employee-related vehicle trips to exercise valves for pipeline maintenance. Operational transportation-related impacts would be less than significant.

Considering the proposed project's anticipated lane closures during construction activities, impacts regarding conflict with existing circulation system programs, plans, ordinances, or policies may be potentially significant. This impact will be further analyzed in an EIR.

POTENTIALLY SIGNIFICANT IMPACT

b. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

CEQA Guidelines Section 15064.3(b) identifies criteria for evaluating transportation impacts and states that vehicle miles traveled (VMT) exceeding a specific threshold may indicate a significant impact. A VMT calculation is typically conducted on a daily or annual basis to determine operational usage of a project. In accordance with Section 15064.3(b)(3) of the State CEQA Guidelines, a lead agency may include a qualitative analysis of operational and construction traffic.

As discussed under threshold (a), traffic on local roadways may be temporarily increased during project construction due to the presence of construction vehicles and equipment. Increases in VMT from construction would be short-term and temporary. Following the completion of construction activities, operation and maintenance activities would be infrequent and would not substantially contribute to VMT along project roadways. Therefore, because VMT from construction would be temporary and limited to the active construction period, and operation and maintenance activities would be negligible, no impact associated with VMT would occur and the proposed project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3(b).

NO IMPACT

c. Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?

The proposed project would not introduce new roadway design features or land uses incompatible with the surrounding area. The project would not involve reconfiguration of any roadways or intersections that could result in a substantial increase in traffic hazards. Pipeline construction activities would require temporary lane closures and the staging and operation of construction equipment on public roadways and roadway shoulders. Traffic control plans would be prepared for work within the public ROW as part of the encroachment permitting process, which would minimize the potential for construction-related traffic hazards. As such, the project would not substantially increase hazards due to a geometric design feature or incompatible use, and no impact would occur.

NO IMPACT

d. Would the project result in inadequate emergency access?

Emergency access to the project alignment would be maintained throughout construction and operation. A segment of alignment along Santa Rosa Road and in front of certain driveways would require flagger-controlled traffic controls, and a minimum of one lane of traffic in each direction would be open during project construction. Construction phasing across arterial roads and driveways would be implemented to maintain access across these locations. Properties with multiple driveways and access points would have only one driveway closed at a time to maintain access to the property.

Although temporary lane closures during project construction would be necessary, emergency access would be maintained at all times. The project would also implement traffic control plans, where necessary, to detour traffic lanes around the work area.

Project operation and maintenance would not introduce new activities or traffic with the potential to result in inadequate emergency access, and the proposed project would not increase demand for

emergency services along the project alignment. The proposed project would have a less than significant impact regarding inadequate emergency access.

LESS THAN SIGNIFICANT IMPACT

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18. Tribal Cultural Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in a Public Resources Code Section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?	■	□	□	□
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivisionI) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivisI (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	■	□	□	□

a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code Section 21074 that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?

b. Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code 21074 that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdilion (c) of Public Resources Code Section 5024.1?

Tribal cultural resources are defined in PRC 21074 as sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either:

- Included or determined to be eligible for inclusion in the California Register of Historical Resources
- Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1

Calleguas circulated AB 52 consultation letters to Native American tribes on December 8, 2022. AB 52 consultation is in progress. Until AB 52 consultation is concluded, there is potential for significant impacts to tribal cultural resources under the proposed project. Such impacts will be analyzed further in an EIR.

POTENTIALLY SIGNIFICANT IMPACT

19. Utilities and Service Systems

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental Effects?	☐	☐	☐	■
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☐	■
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition tI the provider's existing commitments?	☐	☐	☐	■
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	■	☐
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	■	☐

a. Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Water

The proposed project would involve the extension of the CRSMP through construction of the Phase 3 and 4 pipelines. The CRSMP consists of a pipeline system to transport excess recycled water and brine concentrate generated within the Calleguas Creek Watershed to an existing ocean outfall. The proposed project would not introduce new potable water demands, or require the construction

or expansion of water supply infrastructure. As previously discussed, any new or expanded water treatment projects seeking to discharge to the CRSMP, as well as any infrastructure needed for the connections, would be subject to separate CEQA review. As such, no impact would occur.

Wastewater Treatment

The proposed project would involve installation of a brine and excess recycled water discharge pipeline, the environmental effects of which are analyzed in this Initial Study, and which will be continued in the EIR. As previously discussed, any new or expanded wastewater infrastructure seeking to discharge to the CRSMP, as well as any infrastructure needed for the connections, would be subject to separate CEQA review. As such, no impact would occur.

Stormwater Drainage

As discussed in Environmental Checklist Section 10, *Hydrology and Water Quality*, construction of the proposed pipeline would not increase impervious surfaces along the project alignment because the pipeline would be installed underground, and ground surfaces would be restored to pre-project conditions. Therefore, the proposed pipeline would not alter stormwater flow such that new or expanded stormwater drainage systems would be necessary. As such, the project would not create or contribute runoff water such that new or expanded stormwater drainage systems would be necessary, and there would be no impact.

Electric Power

The project would require temporary power for equipment during construction of the proposed pipeline. The project would not require new or relocated energy facilities as a result of the proposed project. There would be no impact related to electric power.

Natural Gas

The project would not involve any components requiring natural gas service and is not anticipated to involve the relocation of existing natural gas facilities. Therefore, no impact related to natural gas facilities would occur.

Telecommunications

The project would not require the construction or relocation of telecommunication facilities. No cell towers or wireless equipment are located within the project alignment such that they would need to be demolished or relocated as a result of the project. No impact would occur.

NO IMPACT

b. Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

The proposed project consists of the construction and operation of a brine and excess recycled water pipeline. Construction of the project would require a temporary water supply for dust suppression during ground disturbing activities, in accordance with standard construction BMPs. Water for dust suppression would be provided from existing sources, or from water obtained through dewatering activities, and would not affect water supply availability.

Operation of the project would not require a water supply, but rather, the project is intended to improve the availability of existing water supplies. The project would facilitate the treatment and use of local water supplies which are currently unusable. As previously discussed, water supply projects facilitated by the extended CRSMP would improve the reliability of local water supplies and reduce the region's reliance on imported supplies. As such, the project would have a beneficial impact on water supplies. No adverse impact would occur.

NO IMPACT

c. Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

The proposed project would not introduce a new source of wastewater, but would rather extend the existing CRSMP so that brine and excess recycled water may be conveyed from farther distances to the ocean outfall. The CRSMP has an existing NPDES permit for ocean outfall discharges associated with the pipeline (NPDES CA0064521). The project would not introduce a new demand for wastewater treatment, as it would discharge pipeline contents to the ocean outfall. Therefore, the project would not result in a determination by a wastewater treatment provider that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments. No impact would occur.

NO IMPACT

d. Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

e. Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

During construction of the proposed project, solid waste would be limited to trench spoils that cannot be used for backfilling and other pavement/demolition material that cannot be reused. Following the completion of project construction, operation and maintenance activities are not anticipated to generate solid waste.

It is anticipated solid waste disposal would likely be serviced by the Simi Valley Landfill and Recycling Center (SVLRC) located approximately 0.9 mile northeast of the project's alignment on Tierra Rejada Road. The SVLRC, as of January 2019, has a total remaining capacity of 82,954,873 tons (CalRecycle 2022). Due to the temporary nature of construction and minimal amount of construction waste anticipated to require disposal, the project would not generate quantities of solid waste that would account for a substantial percentage of the total daily regional permitted capacity available at SVLRC. Therefore, waste generated by demolition and construction activities would not exceed the available capacity at the landfill serving the project area that would accept debris generated by the project, and impacts would be less than significant.

The project would be required to comply with all applicable laws and regulations related to solid waste generation, collection, and disposal. The project would result in a short-term and temporary increase in solid waste generation during construction but would not substantially affect standard solid waste operations of any landfill accepting waste. Recycling and reuse activities during construction would comply with the California Integrated Waste Management Act of 1989 (AB 939).

Once operational, the project would include unstaffed facilities that would not generate solid waste. Therefore, solid waste impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

20. Wildfire

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	■
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a Wildfire?	☐	☐	■	☐
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	■
d. Expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	■

a. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

CAL FIRE evaluates fire hazards based on fuel, slope, and weather, and identifies hazard areas as Moderate, High, or Very High, which are mapped on Fire Hazard Severity Zone (FHSZ) maps. These maps reflect "hazard" not "risk," where hazards are based on the physical conditions that create a likelihood and expected fire behavior over a 30- to 50-year period without consideration to modifications such as fuel reduction efforts (CAL FIRE 2022b). In comparison, "risk" is the potential damage a fire could do to an area under existing conditions, including consideration for fuel reduction efforts and other modifications such as the maintenance of defensible space and ignition resistant building construction (CAL FIRE 2022b). FHSZ designations are used for planning purposes, including to designate areas where California's defensible space standards and wildland urban interface building codes are required.

Portions of the project alignment along Santa Rosa Road, Moorpark Road, and Tierra Rejada Road are within State Responsibility Areas (SRA) designated as Very High FHSZ. Additionally, portions of the project alignment along Santa Rosa Road, Moorpark Road, Read Road, and Tierra Rejada Road are located within Local Responsibility Areas (LRA) designated as Very High FHSZs (CAL FIRE 2022a).

As discussed in Environmental Checklist Section 9, *Hazards and Hazardous Materials*, and Environmental Checklist Section 17, *Transportation*, neither construction nor operation of the proposed project would impair or conflict with an adopted emergency response or evacuation plan and the project would not result in inadequate access for emergency response vehicles. City and County General Plan Safety Elements do not identify roadways along the project alignment as major evacuation routes.

As such, the proposed project would not substantially impair an adopted emergency response plan or emergency evacuation plan. No impact would occur.

NO IMPACT

b. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

As discussed under threshold (a) above, portions of the project alignment are located within Very High FHSZs, indicating slope, winds, and fuel availability around the project alignment create a high potential for fire, absent any fuel modification efforts.

Construction of the proposed project would include the use of heavy-duty equipment; in accordance with PRC Section 4442, equipment including earth-moving and portable construction equipment with internal combustion engines would be equipped with spark arrestors to prevent the emission of flammable debris from exhaust, when operating on any forest-covered, brush-covered, or grass-covered land. In addition, PRC Sections 4427 and 4431 specify standards for conducting construction activities on days when a burning permit is required, and PRC Section 4428 requires construction contractors to maintain fire suppression equipment during the highest fire danger period (April 1 to December 1) when operating on or near any forest-covered, brush-covered, or grass-covered land.

The proposed project would extend the CRSMP through existing roadways, which are paved; however, the open space areas along Santa Rosa Road and Tierra Rejada Road could be characterized as grass-covered land. Therefore, the fire precautions prescribed by PRC Section 4442, 4427, 4428, and 4431 would be implemented during project construction activities. Through compliance with applicable PRC provisions, project construction would not exacerbate wildfire risk. Following completion of the construction period, operation and maintenance activities would be comparable to existing conditions. The project would not introduce habitable structures or expose individuals to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. The proposed project would not exacerbate fire risks and potential impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

c. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

d. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

As noted above, portions of the project alignment are located within a Very High FHSZ in both SRAs and LRAs (CAL FIRE 2022a). However, the project would not require roads, fuel breaks, emergency water sources, power lines, or other utilities that may exacerbate fire risk. Upon completion of construction, the ground surface would be restored to pre-project conditions. Annual operation and maintenance activities to exercise pipeline valves would not exacerbate fire risk.

Construction would occur within previously developed roadways and public ROW, as well as under private agricultural property at the northeast corner of the intersection of Las Posas Road and Upland Road, and would not disturb adjacent open space or hillside areas. Additionally, as discussed in Environmental Checklist Section 10, *Hydrology and Water Quality*, the proposed project would not alter existing drainage patterns or stormwater runoff rates or patterns, and would include the use of stormwater BMPs to avoid causing or contributing to increased runoff or drainage changes. As such, the project would not expose people or structures to significant downslope or downstream flooding or landslide risks resulting from runoff or drainage changes. No impact would occur.

NO IMPACT

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21. Mandatory Findings of Significance

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Does the project:				
a. Have the potential to substantially 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, substantially 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?	■	□	□	□
b. 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 effects of other current projects, and the effects of probable future projects)?	■	□	□	□
c. Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	■	□	□	□

a. Does the project have the potential to substantially 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, substantially 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 Environmental Checklist Sections 4, *Biological Resources*, 5, *Cultural Resources*, and 18, *Tribal Cultural Resources*, impacts related to biological and cultural resources are potentially significant and will be analyzed further in an EIR.

POTENTIALLY SIGNIFICANT IMPACT

b. 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 effects of other current projects, and the effects of probable future projects)?

Cumulative impacts are defined as two or more individual (and potentially less than significant) project effects which, when considered together or in concert with other projects, combine to result in a significant impact within an identified geographic area. For a project to contribute to cumulative impacts, it must result in some level of impact on a project-specific level. A number of the environmental topic areas would experience "No Impact" as a result of the proposed project, and would therefore have no potential to result in cumulative impacts. These environmental topics include the following, which are not addressed further herein:

- Agriculture and Forestry Resources
- Energy
- Land Use and Planning
- Mineral Resources
- Public Services

The following discussion describes only those effects for which some level of potential impact was identified, which includes topics for which a "Less than Significant Impact" was identified, as well as those for which the threshold question assumed some level of impact (i.e., those for which consideration of a potential "significant" effect was considered, per CEQA Guidelines Section 15382; in this case, threshold questions which assumed impacts would be "Less than Significant with Mitigation Incorporated").

This analysis considers high-level potential cumulative development within the project area, which spans approximately 14 miles and multiple jurisdictions. Active and planned projects within the proposed project's area include residential development along Upland Road in the City of Camarillo (City of Camarillo 2022), a new telecommunications facility on Tierra Rejada Road in the City of Simi Valley (City of Simi Valley 2022), and telecommunications improvements on Santa Rosa Road in Ventura County (County of Ventura 2022).

In addition to unrelated projects that may be developed within the same regional vicinity as the proposed project, other cumulative projects may include development required to construct and/or connect additional discharger facilities to the CRSMP.

Potential regional cumulative effects were considered for the remaining environmental topics, for which the project was found to result in less than significant impacts (without or with project mitigation):

- **Aesthetics:** Temporary aesthetic impacts may occur from the presence and use of equipment and machinery at and around the project site that may be visible from public access points and coincide with construction of planned projects along Upland Road, Santa Rosa Road, or Tierra Rejada Road. The proposed project would not conflict with applicable zoning and other regulations governing scenic quality or create a significant new source of light and glare when considered in conjunction with other cumulative development. Therefore, the project would not result in a cumulatively considerable contribution to a cumulative impact, significant or otherwise.

- **Air Quality:** Because the SCCAB is designated as being in nonattainment for the ozone NAAQS and CAAQS and nonattainment for the PM_{10} CAAQS, significant cumulative air quality impacts currently exist for these pollutants. As discussed in Environmental Checklist Section 3, *Air Quality,* the proposed project would not generate emissions of these air pollutants which exceed the VCAPCD significance thresholds, which are intended to assess whether a project's contribution to existing cumulative air quality impacts is considerable. Therefore, the project's contribution to significant cumulative air quality impacts would not be cumulatively considerable.
- **Greenhouse Gas Emissions:** GHG emissions and climate change are, by definition, cumulative impacts. As discussed in Environmental Checklist Section 8, *Greenhouse Gas Emissions*, the adverse environmental impacts of cumulative GHG emissions, including sea level rise, increased average temperatures, more drought years, and more frequent large wildfires, are already occurring. As a result, cumulative impacts related to GHG emissions are significant. Thus, the issue of climate change involves an analysis of whether a project's contribution towards an impact is cumulatively considerable. As discussed in Environmental Checklist Section 8, *Greenhouse Gas Emissions*, project emissions would be consistent with adopted plans and would therefore not be cumulatively considerable.
- **Hazards and Hazardous Materials:** Similar to the proposed project, cumulative projects would be required to comply with regulations applicable to the use, disposal, and transportation of hazardous materials during construction activities, and compliance with applicable regulations would reduce potential cumulative impacts to less-than-significant levels. With respect to the use and accidental release of hazardous materials in the environment during construction, effects are generally limited to site-specific conditions. Therefore, cumulative impacts related to accidental release of hazardous materials would not be significant.
- **Hydrology and Water Quality:** As discussed in Environmental Checklist Section 10, *Hydrology and Water Quality*, the project's construction-related water quality impacts would be less than significant with regulatory compliance. Cumulative development projects would be subject to the same requirements. In addition, as previously discussed, additional discharges to the CRSMP would be required to comply with water quality criteria pollutant limitations in the NPDES permit for the ocean outfall. As such, cumulative development, including potential development associated with discharger facilities, would not result in significant cumulative hydrology and water quality impacts.
- **Population and Housing:** The project would not result in direct or indirect substantial unplanned population growth, and would not displace existing people or housing. Therefore, the project would not result in a cumulatively considerable contribution to cumulative impacts, significant or otherwise, related to population and housing.
- **Recreation**: The project would not induce population growth and would not result in the substantial deterioration of or need for recreational facilities. Impacts to existing recreational facilities would be short-term and temporary and would not be cumulatively considerable.
- **Utilities and Service Systems:** The project involves improvements to utility infrastructure, and would therefore not result in cumulatively considerable adverse impacts to utilities and service systems.
- **Wildfire:** As described in Environmental Checklist Section 20, *Wildfire*, potential wildfire impacts associated with the project would be limited to heavy-duty construction equipment possibly producing sparks to ignite vegetation, which would be less than significant with compliance with applicable law. Project operation would not involve potentially flammable activities. In addition,

the proposed project would not introduce habitable structures, and therefore, would not expose new residents to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Since there would be no long-term operational wildfire impacts and any construction-related wildfire impacts would be short-term, the project's contribution to any cumulative impact, significant or otherwise, would not be considerable.

The cumulative effects of the project for the remaining environmental topics for which the project was found to result in a "Potentially Significant Impact" including biological resources, cultural resources, geology and soils, noise, transportation, and tribal cultural resources, will be evaluated in an EIR.

POTENTIALLY SIGNIFICANT IMPACT

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

In general, impacts to human beings are associated with issues such as air quality, hazards and hazardous materials, and noise. As discussed in Environmental Checklist Section 3, *Air Quality,* and Environmental Checklist Section 9, *Hazards and Hazardous Materials,* the project would not result in significant impacts associated with air quality and hazards or hazardous materials. As detailed under Environmental Checklist Section 13, *Noise*, the project could potentially result in significant impacts associated with noise. Potential noise impacts will be evaluated in an EIR.

POTENTIALLY SIGNIFICANT IMPACT

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