

SECTION C - DISCUSSION OF RESPONSES TO CHECKLIST

Although Triunfo Sanitation is not required to utilize the environmental review format and thresholds of the County of Ventura, the assessment and threshold criteria provided in the Ventura County Initial Study Assessment Guidelines (County Guidelines), February 2006, has been used as guidance for this Initial Study evaluation.

1. GENERAL PLAN ENVIRONMENTAL GOALS AND POLICIES

Setting: The majority of the project site is located within the SMMNRA. NPS park planning documents include:

- 2002 General Management Plan;
- 2002 Simi Hills Comprehensive Design Plan
- 2007 Update to Fire Management Plan; and
- 1998 Land Protection Plan.

Of these plans, the General Management Plan (GMP) contains goals that are relevant for consideration with respect to the proposed project and its potential effects on the SMMNRA. The primary Congressional intent in establishing the SMMNRA was for the management of the area in a manner which would preserve and enhance its scenic, natural and historic setting and its public health value as an air shed for the Southern Metropolitan area while providing for the recreational and educational needs of the visiting public. As such, the goals of the GMP reflect this intent and generally:

- promote protection and enhancement of biological resources;
- preserve the cultural history of the Santa Monica Mountains;
- make the built environments work in harmony with the natural environment;
- provide for a positive visitor experience;
- provide for and encourage educational opportunities; and
- make the park accessible to all when possible.

The Simi Hills Comprehensive Design Plan contains management objectives specific to federal parkland in the Simi Hills, including Cheeseboro and Palo Comado Canyons. Park managers are directed to:

- protect and perpetuate the plants, animals and natural and cultural processes that comprise the local and regional setting of the Simi Hills;

- protect and preserve archeological sites and features, ethnographic values, historically significant structures, and cultural landscapes as part of the vital heritage of the Simi Hills;
- recognize the role the Simi Hills play in a regional ecosystem, with special emphasis on working with agencies and landowners to protect habitat connections for plant and animal species;
- preserve the area's diverse scenery by protecting and enhancing interior viewsheds and distant vistas;
- provide visitors of varying abilities and interests with an opportunity to experience the area's natural beauty through the establishment of environmentally sensitive recreation facilities;
- provide information and education opportunities that will foster greater understanding and appreciation for the area's natural and cultural heritage and instill in visitors a new environmental awareness;
- design programs and facilities for the area that are durable over time, efficient to operate, and attainable with resources available to the National Park Service and partner agencies;
- establish an ongoing dialogue and partnership with local agencies and park neighbors to promote shared responsibility for open space and habitat protection, trail systems, and scenic vistas; and
- complement existing and ongoing regional planning to ensure continuity between adjacent recreation sites and facilities.

Additionally, park laws and policies of operation are identified in *The Superintendent's Compendium: Designations, Closures, Permit Requirements and Other Restrictions Imposed Under Discretionary Authority*. In accordance with regulations and the delegated authority provided in Title 36, Code of Federal Regulations ("36 CFR"), Volume 1, Chapter 1, Parts 1-5, authorized by Title 16, United States Code, Chapter 1, Subchapter I, Section 3, the compendium sets forth regulatory provisions that are established for the proper management, protection, government and public use of the portions of SMMNRA under the jurisdiction of the NPS.

The Santa Monica Mountains Comprehensive Plan (1979) is the guidance document for the SMMC. The identified objectives of the plan that are relevant to the proposed project include:

- giving priority to natural resource protection when balancing development and conservation goals;

- improve air quality and water quality; and
- prevent noise pollution.

The guiding policy and planning document for the unincorporated Ventura County portion of the project area is the Ventura County General Plan (GP) including the Oak Park Area Plan (OPAP). The GP identifies a series of goals and policies relating to land use in its Goals, Policies and Programs document (as amended September 9, 2008).

The GP goals and policies that are most relevant to the proposed project pertain to:

- the protection of air quality, water quality, biological resources, cultural resources, visual resources and natural beauty;
- the protection of public health and safety from various hazards (e.g., geologic, noise, hazardous materials, fire, etc.); and
- protection of public access to recreational areas.

A complete abbreviated listing of General Plan goals and policies is provided as Appendix B to the Initial Study.

Impact Discussion: The County of Ventura Initial Study Assessment Guidelines state that any project that is inconsistent with a specific environmental policy of the General Plan is considered as having a significant environmental impact. Any project that appears to be inconsistent with an environmental goal of the General Plan, must be evaluated by the Planning Division in light of other related goals, policies and programs of the General Plan in order to determine significance. As indicated previously, the Triunfo Sanitation District as an independent agency and is not required to use the thresholds presented in the County of Ventura Initial Study Assessment Guidelines. However, the District is using the thresholds as a guideline for its impact evaluation for this proposed project. As an independent agency, the District itself will evaluate any apparent inconsistency with County goals and policies.

Policy Consistency

The project is the decommissioning of obsolete potable water infrastructure. Impacts associated with the proposed project are limited to short-term effects. Further, the decommissioning methodology has been developed in coordination with staff from the NPS in order to minimize any adverse environmental effects of the project within the SMMNRA. Potentially significant impacts are identified below in the impact assessment sections and include: water quality, biological resources, visual resources, cultural resources, hydraulic hazards, fire hazards, hazardous materials, noise, public health, transportation and recreation (see Sections C.4, C.6, C.8, C.10, C.15, C.17, C.18, C.19, C.21, C.22 and C.30). To the extent that these impacts are inconsistent with the intent, objectives, goals and policies of the plans identified above, the project may be considered inconsistent with these plans. However, this environmental document provides mitigation measures for all identified impacts such that no

residual impact would be considered significant and all impacts would be mitigated to the extent feasible or practical. Thus potential plan and policy inconsistencies are considered significant, but mitigable impacts of the project.

Mitigation and Residual Impacts: With implementation of mitigation measures detailed in the Initial Study sections that follow, the proposed project would be consistent with the relevant plans, goals and policies previously identified.

2. LAND USE

a. Community Character

Setting: The majority of the project infrastructure proposed for decommissioning is located within the SMMNRA. Within the project area, the park is comprised mainly of undeveloped open space with a few amenities such as parking, restrooms and picnic facilities located proximate to the Cheeseboro Canyon main park entrance.

The Cheeseboro, Palo and Las Virgenes Canyons were historically used for ranching and a few artifacts from that period (such as the ranch roads and small tanks), as well as the later-constructed water infrastructure presently proposed for decommissioning, remain today. The area is presently enjoyed by outdoor enthusiasts of all kinds including naturalists, hikers and mountain bikers among others.

A portion of the Lindero Feeder proposed for decommissioning is within the community of Oak Park, specifically a County road right-of-way and open space under the jurisdiction of RSRPD. The community of Oak Park is mainly a residential community with little employment base. Much of the community's perimeter is bordered by recreational open space.

Impact Discussion: The County Guidelines states that:

All projects have some degree of impact on community character. Any project that is consistent with both the zoning and the General Plan (Land Use Chapter of the Goals, Policies and Programs, and Area Plan) can be determined to have a less than significant impact on the land use of an area, so long as it's design/architectural style is compatible with the surrounding community.

During the decommissioning, the land uses in the vicinity of the project infrastructure would be adversely affected by noise, air emissions, construction traffic and views of construction. These issues are evaluated in issue-specific sections of this Initial Study below. However, because these effects would be temporary, and do not affect the design or architectural character of the community, no impact on community character would result.

Within the SMMNRA the project would include the removal of an above-ground tank structure, pump station, and associated surface features at both the Cheeseboro Reservoir site, Palo Comado Pump Station and along the Lindero Feeder pipeline alignment. This would improve the character of the recreation area by returning it to a more natural condition. The

pipeline itself would be abandoned in place as agreed to by the District and the NPS in order to minimize environmental damage that would be associated with its removal. The pipeline is anticipated to deteriorate over time and the future maintenance of the pipeline alignment with respect to public safety would be the ongoing responsibility of the NPS upon transfer of the pipeline easement.

The project as a water storage and transmission infrastructure project is not subject to the County zoning ordinance, pursuant to California Government Code Section 53091. The County does not have a zoning or land use designation specific to water infrastructure.

The project would have a beneficial long-term affect on community character and would therefore not contribute to any adverse cumulative community character impacts.

Mitigation and Residual Impacts: There is no significant impact. Therefore, no mitigation is required.

b. Housing

Setting: There is no housing within the project site.

Impact Discussion: County Guidelines for significance of impacts to housing pertain to removal of existing housing and creation of demand for housing. Short-term (18-month or less) construction worker housing demand is not considered significant because there have historically been more construction workers than construction jobs County-wide, and the work is short-term. A project that employs 30 or more full-time workers is regarded as potentially significant if the current housing market vacancy rate in the area is less than 3 percent, unless there is sufficient planned residential development to increase the vacancy rate to above 3 percent.

The necessary short-term construction-related employees are expected to be fewer than 30 and would come from the region or be temporarily located here as part of a construction crew. No new housing is expected to be required to accommodate these temporary employees. No new full-time employees would be required for project implementation.

No housing is located within the project's direct impact areas. As such, it would not be necessary to provide replacement housing. Based upon the factors described above, the proposed project would not have a project-specific impact on housing, and it would not contribute to any cumulative housing impacts.

Mitigation and Residual Impacts: There is no impact. Therefore, no mitigation is required.

c. Growth Inducement

Setting and Impact Discussion: The County Guidelines indicate that growth inducing impacts are to be assessed on a case-by-case basis depending upon:

- How much growth would be accommodated by removing an impediment to growth and setting a precedent for similar actions in the future.
- Whether the project is consistent with the planned land use of the area.
- The physical impacts of said growth (secondary impacts).

The person responsible for administering the project shall ascertain whether or not the project would:

1. Result or necessitate the expansion of critical public facilities (e.g., roads, water supplies, sewers, flood control facilities), or
2. Be counter to or substantially amend adopted policy of the County, thereby setting a precedent or an accommodation for further growth. If either of these results occur, then the amount of growth that could be accommodated must be estimated and compared with land use assumptions and policies in the General Plan. If the potentially induced growth is inconsistent with the General Plan Land use assumptions/policies, then the environmental impacts of this induced growth must be evaluated.

The project is a decommissioning of existing water infrastructure. No replacement of this infrastructure is proposed. No new long-term permanent employment positions would be created by the project. Therefore, the project will not: induce a new population of workers to the area, create a need for new housing, or remove an obstacle to future growth. For these reasons, the project is not growth inducing, and would not contribute to any cumulative growth impacts.

Mitigation and Residual Impacts: There is no impact. Therefore, no mitigation is required.

3. AIR QUALITY

a. Regional

Setting: The air quality of Ventura County is monitored by a network of air monitoring stations operated by the California Environmental Protection Agency, California Air Resources Board (ARB) and the Ventura County Air Pollution Control District (APCD). The air monitoring network includes six stations in Ventura County. The closest station to the project site is the Thousand Oaks station, located on Moorpark Road in Thousand Oaks.

Air quality standards are specific concentrations of pollutants that are used as thresholds to protect public health and the public welfare. Currently, ambient air quality data collected in Ventura County has resulted in the designation of non-attainment for:

- Federal 8-hour ozone standard;
- State 1-hour ozone standard;

- State 8-hour ozone standard;
- State PM₁₀ standard (particles less than 10 microns in diameter);
- State PM_{2.5} standard (particles less than 2.5 microns in diameter);

Non-attainment means the applicable air quality standard is regularly violated.

ARB-documented exceedances of air quality standards recorded at the Thousand Oaks monitoring station from 2006 through 2008 include:

- The State 1-hour ozone standard (0.09 parts per million [ppm]) was exceeded on an average of 2 days per year during this period;
- The Federal 8-hour ozone standard (0.085 ppm) was exceeded on an average of 4 days during this period;
- The State PM₁₀ standard (50 micrograms per cubic meter) – no data is available for this station during this period; and
- The Federal PM_{2.5} standard was not exceeded in 2006 or 2007; no data is available for 2008.

Impact Discussion: The Ventura County APCD is the local agency responsible for monitoring, regulating and improving ambient air quality within Ventura County. In October 2003, the Ventura County APCD proposed the Ventura County Air Quality Assessment Guidelines (Guidelines), which include project-specific thresholds that should not be exceeded to ensure consistency with the AQMP and minimize public exposure to pollutants:

- Conflict with or obstruct implementation of the Air Quality Management Plan (AQMP);
- Violate any air quality standard or contribute to an existing or projected air quality violation;
- Result in a cumulatively considerable net increase of any criteria non-attainment pollutant;
- Expose the public (especially schools, day care centers, hospitals, retirement homes, convalescent facilities and residences) to substantial pollutant concentrations; and
- Create objectionable odors affecting a substantial number of people.

A considerable net increase of ozone precursors (a non-attainment pollutant) is considered 25 pounds per day of reactive organic gases (ROG) and oxides of nitrogen (NO_x).

The Ventura County APCD significance thresholds are not applicable to construction emissions since these emissions are only temporary (APCD, 2003). However, due to the lack of attainment of the ozone and PM₁₀ standards construction mitigation should be applied to all phases of construction.

Short-Term. Decommissioning related NO_x emissions could exceed 25 pounds per day; during removal of the Cheeseboro Reservoir and the Palo Comado Pump Station Demolition. Typical emissions are expected to be at least 28 pounds NO_x per day during earthwork and demolition activities during the Cheeseboro Reservoir, which involves the use of; a backhoe, a crane and heavy duty trucks. If tank demolition, pump station demolition and pipeline decommissioning occur simultaneously, maximum daily NO_x emissions could be 67.4 pounds per day. Due to the short-term nature of these emissions, the Ventura County APCD significance thresholds are not applicable. Therefore, short-term emissions are considered a less than significant impact.

Table C3-1. Estimated Project Criteria Pollutant Emissions

Source	Pounds per Peak Day					Tons				
	ROG	NO _x	CO	PM ₁₀	SO ₂	ROG	NO _x	CO	PM ₁₀	SO ₂
Mobilization/ Demobilization	1.4	7.2	17.8	0.3	0.0	0.00	0.01	0.02	0.00	0.00
Cheeseboro Reservoir Demolition	6.6	28.1	88.6	1.2	0.06	0.05	0.21	0.67	0.01	0.00
Palo Comado Pump Station Demolition	6.6	28.1	88.6	1.2	0.06	0.05	0.21	0.67	0.01	0.00
Lindero Feeder Pipeline Decommissioning	1.2	12.5	4.4	0.57	0.01	0.00	0.01	0.00	0.00	0.00
Total	15.8	75.9	199.5	3.4	0.15	0.10	0.45	1.35	0.02	0.00

Earthwork during pipeline decommissioning, tank removal and pump station demolition would generate fugitive dust, which may cause or substantially contribute to violations of the State PM₁₀ standard. To reduce the possible impacts from fugitive dust, the decommissioning contractor would implement standard dust control measures as listed under Mitigation Measures. Therefore, no violations of the PM₁₀ standard are expected.

Long-Term. There is no post-decommissioning activity associated with the project, therefore there will be no long-term air emissions.

The District will also comply with all applicable APCD Rules and Regulations including Rule 51, *Nuisance*. Rule 51 states: *A person shall not discharge from any source whatsoever such quantities of air contaminants or other materials which cause injury, detriment, nuisance or annoyance to any considerable number of persons or to the public or which cause or have a natural tendency to cause injury or damage to business or property.*

Cumulative Impacts. The project's emissions are not considered to be cumulatively considerable.

Greenhouse Gases. The American public and government have recently become concerned about greenhouse gas (GHG) emissions and their effects on global climate change. In 2006, the California State Legislature signed AB 32 which charged the California Air

Resources Board (CARB) to develop regulations on how the state would address global climate change (also known as “global warming”). CARB, the State EPA, the U.S. EPA, or other appropriate governmental organizations have not yet adopted guidelines on how to prepare an impact assessment for global climate change. Additionally, there are currently no published thresholds for measuring the significance of a project’s cumulative contribution to global climate change.

The proposed project will produce a total of 75.4 metric tons of CO₂ equivalent (CO₂E) GHG emissions. These emissions would occur only during the brief decommissioning period. Emission calculations are provided below in Table C3-2. Following decommissioning, the proposed project would not produce any GHG emissions. Because quantitative GHG guidelines, including thresholds, have not been developed by the State, or the VCAPCD, these emissions are provided for information purposes only. According to a recent white paper by the Association of Environmental Professionals, “an individual project does not generate enough GHG emissions to significantly influence global climate change. Global climate change is a cumulative impact; a project participates in this potential impact through its incremental contribution combined with the cumulative increase of all other sources of GHG emissions.” The temporary GHG emissions generated by the proposed construction project would be an inconsequentially small fraction of the worldwide GHG emissions during the brief construction period.

In view of the lack of appropriate thresholds of significance for a project’s contribution to global warming, this analysis relies on an assumed correlation between the project’s emissions for criteria pollutants, as evaluated above, and GHG emissions. Because the project’s criteria pollutant emissions are less than significant, it is assumed the project’s GHG emissions, while adverse, would likewise be less than significant.

Table C3-2. Estimated Project GHG Emissions

Source	Tons			
	N ₂ O	CH ₄	CO ₂	CO ₂ E
Mobilization/ Demobilization	0.00	0.00	3.20	3.24
Cheeseboro Reservoir Demolition	0.001	0.003	34.0	34.5
Palo Comado Pump Station Demolition	0.001	0.003	34.0	34.5
Lindero Feeder Pipeline Decommissioning	0.00	0.00	3.05	3.11
Total	0.003	0.007	72.25	74.26

Consistency with the Air Quality Management Plan (AQMP). The project would not result in population growth in the service area, or otherwise cause the local population to exceed the projections of the AQMP.

Mitigation and Residual Impacts: To comply with County of Ventura APCD recommendations, the following mitigation measures shall be incorporated into the proposed project to reduce potential short-term impacts to air quality:

AQ1 During decommissioning, the contractor shall implement an Emissions Reduction and Fugitive Dust Control Program. The program shall include:

- Water trucks will spray exposed soils as needed to keep dust to a minimum.
- To prevent excessive amounts of dust, dust producing operations will cease during high wind events. (High wind events are defined as wind of such velocity as to cause fugitive dust from within the site to blow off-site).
- Streets will be swept at the end of the day if visible soil material is carried over adjacent roads.
- On-site vehicular traffic speed will be limited to no more than 15 mph.
- All trucks importing/exporting loose materials to the site will use tarpaulins to cover the load.
- All excavated material will be sufficiently watered to prevent excessive amounts of dust.
- All material being moved will be watered or covered.
- Minimize equipment idling time.
- Maintain equipment engines in good condition and proper tune per manufacturer's specification.
- Use alternatively fueled (e.g., compressed natural gas, liquefied natural gas, biodiesel, or electric) construction equipment, if feasible.

GHG emission reduction strategies contained in the California Climate Action Team's (CCAT) Report to the Governor of California (March 2006) include the following measures appropriate for incorporation into development: vehicle trip reduction strategies; providing multi-modal transportation options; increasing energy efficiency beyond Title 24 requirements; increased recycling; and incorporating green building technology. Of these strategies, recycling as incorporated into the project, and the use of alternative fueled vehicles, specifically biodiesel blends and ethanol (last bullet item of mitigation measure AQ1) are in support of the alternative fuels CCAT strategy.

b. Local

Setting: The regional air quality setting provides an adequate description of the local air quality setting.

Impact Discussion:

Short-Term. Dust and exhaust emissions during construction are described above under the "regional" heading.

Long-Term. No long-term emissions are associated with the proposed project. Therefore, the project would not contribute to any long-term cumulative air quality impact.

Mitigation and Residual Impacts: The mitigation measures identified above under the regional discussion would also be effective in reducing short-term localized emissions. No other mitigation is required.

4. WATER RESOURCES

a. Groundwater Quantity

Setting: The Cheeseboro Tank site is not located over a groundwater basin as identified by the County mapping system. However, portions of the project facilities area overlay the Las Virgenes Canyon Groundwater Basin at Palo Comado Canyon, Cheeseboro Canyon and Las Virgenes Canyon.

The Las Virgenes/Lindero Canyon Groundwater Basin water-bearing formations include quaternary and tertiary rocks. The principal aquifer is comprised of lenses of permeable sediments and fracture zones. Groundwater occurrence is unconfined and is balanced, but the storage capacity unknown (County of Ventura Watershed Protection District, Groundwater Basin Details web page, 2009).

Groundwater in the region is recharged from precipitation, irrigation and infiltration of surface waters (Versar, 2008). Except for areas of springs and seeps, groundwater flow roughly parallels surface topography, converging in the valleys. The groundwater moves down-gradient, emerging as surface water in creeks and discharging ultimately to the ocean as surface and subsurface flow.

Impact Discussion: The County Guidelines provide the following applicable significance thresholds pertaining to groundwater quantity: a project will have a significant impact on groundwater quantity if it will increase the net use of groundwater in a basin that is overdrafted, or individually or cumulatively cause a basin to become overdrafted.

The proposed project would not result in the extraction or use of groundwater. Therefore, the project would not impact groundwater quantity on a project-specific or cumulative basis.

Mitigation and Residual Impact: No significant, adverse impact would result. Therefore, no mitigation is required.

b. Groundwater Quality

Setting: See subsection a.

Impact Discussion: The County Guidelines state that any project that will individually or cumulatively degrade the quality of groundwater and cause it to fail to meet groundwater quality objectives set by the Los Angeles Regional Water Quality Control Board will have a significant impact.

Portions of the project site, specifically, the pipelines and appurtenant structures that would be located in Palo Comado Canyon, Cheeseboro Canyon and Las Virgenes Canyon would be located within the Las Virgenes Canyon Groundwater Basin. Decommissioning activities should they include refueling of equipment or use of toxic materials (e.g., lubricants, solvents) could result in potentially significant impacts to groundwater should a spill occur and such materials percolate to groundwater bearing units. The potential for project-related contamination of groundwater may be considered cumulatively significant due to the potential for contamination from other sources within the groundwater basin. Due to the nature of the proposed development, which is decommissioning of potable water infrastructure, no long-term adverse impacts to groundwater quality are anticipated.

Mitigation and Residual Impact: The following mitigation would reduce potentially significant groundwater impacts to a less than significant level.

GWQ1 Prior to decommissioning the District shall develop a Storm Water Pollution Prevention Plan (SWPPP) covering all aspects of the project and specifically addressing conditions and measures to be implemented to minimize the effects of erosion and/or a spill of toxic substances. The SWPPP should include, but not be limited to, spill contingency measures, vehicle and equipment maintenance, and any dewatering activities that become necessary in accessing manholes. The SWPPP shall be implemented throughout the duration of the project as necessary.

GWQ2 All project equipment and vehicles shall be required to carry absorbent materials to be used in the event of fuel or oil leaks or spills. Sufficient quantities of spill containment and clean-up materials shall be stored at the staging areas for clean up of spills during refueling or servicing of equipment. All spills, regardless of size, shall be cleaned up immediately and reported, if required by existing regulations.

GWQ3 The contractor shall prepare and implement an equipment fueling plan that identifies measures to be implemented to ensure no fuel leakage during refueling and what measures will be implemented in the event that despite all preventative measures such a spill does occur. All vehicle or equipment repair or fueling shall occur within specific areas to be designated by the contractor and approved by the District and NPS. Such areas shall be at least 100 feet

(31 m) from wetlands and water courses. Parked equipment and vehicles shall have drip pans with absorbent material placed beneath any areas of potential leakage.

c. Surface Water Quantity

Setting: Portions of the project site are located within the Medea Creek, Palo Comado Creek, Cheeseboro Creek and Las Virgenes Creek Watersheds (Ventura County Resources Management Agency Mapping Services – GIS, November 2006). The referenced watersheds are within the greater Malibu Creek Watershed. The Malibu Creek Watershed is located in the northwest corner of Los Angeles County and southeast corner of Ventura County. It is bounded on the north, west, and east by the Santa Monica Mountains and on the south by the Pacific Ocean. Malibu Creek Watershed, at just under 110 square miles, is the second largest watershed draining into Santa Monica Bay.

Impact Discussion: The County Guidelines provide the following thresholds of significance for surface water quantity impacts:

1. Any use that will increase the net utilization of surface water in a hydrologic unit that is overdrafted or adversely impacts an overdrafted hydrologic unit is a significant adverse impact.
2. In hydrologic units that are not overdrafted or that do not impact an overdrafted hydrologic unit, water use that will individually or cumulatively cause the hydrologic unit to become overdrafted is a significant adverse impact.
3. In areas where the hydrologic condition is not known, it must be assumed that any net increase in surface water use may potentially cause a significant impact unless a reliable study determines otherwise.

The project would not require the use of surface waters with the exception of temporary use of reclaimed or potable water for dust suppression. This minimal use of surface water is a less than significant impact on surface water quantity on a project-specific and cumulative basis.

Mitigation and Residual Impact: No significant impact would result. Therefore, no mitigation is necessary.

d. Surface Water Quality

Setting: As indicated above, portions of the project site are located within the Medea Creek, Palo Comado Creek, Cheeseboro Creek and Las Virgenes Creek Watersheds. Medea Creek reaches 1 (lake to confluence with Lindero) and 2 (above confluence with Lindero) within the Malibu Creek Watershed have the following impairments as listed on the 2006 Clean Water Act Section 303(d) List of Water Quality Limited Segments: algae, scum/unnatural foam, selenium and trash. Palo Comado Creek is listed as impaired for coliform bacteria. Cheeseboro Creek has no listed impairments. Las Virgenes Creek is listed as impaired for the

same pollutants as Medea Creek and Palo Comado Creek plus organic enrichment/low dissolved oxygen and sedimentation/siltation. Malibu Creek has the same impairments listed above for Medea Creek plus sedimentation/siltation, sulfates and fish barriers. Within the parkland upstream of the urban areas, including the area of the project, the referenced creeks are not impaired.

Impact Discussion: The County Guidelines indicate that a land use or activity could cause a significant adverse impact upon surface water resources in itself or on a cumulative basis if it will degrade the quality of surface water and cause it to fail to meet the surface water quality objectives for a hydrologic unit.

Proposed project activities would include limited ground disturbance at the Cheeseboro Tank site, Palo Comado Pump Station and certain areas along the pipeline alignment. This ground disturbance has the potential to result in erosion during storm events and thus sedimentation/siltation of down-gradient water courses. Additionally the use of vehicles and equipment may introduce pollutants to surface water courses through erosion and in the case of a spill of fuels, chemicals or other materials. Finally, if any disturbed areas are left without adequate ground cover after disturbance, erosion and resulting sedimentation siltation of downstream water bodies may result. However, the District proposes to hydro-seed the disturbance area upon project completion for erosion control and re-establishment of native vegetation. Project surface water quality impacts are potentially significant and may be considered to be cumulatively considerable due to the existing impairments of the downstream surface waters.

No long-term activities are proposed that would lead to significant surface water quality impacts. Any hazardous materials that are present at the site are proposed to be removed and disposed of in accordance with all applicable local, state and federal regulations. Thus, any long-term water quality hazard from migration of such materials from the site into waterways would be eliminated. This may be considered a beneficial impact of the proposed project.

Mitigation and Residual Impact: Mitigation measures GWQ-1 through GWQ-3 would serve to reduce short-term water quality impacts to a less than significant level.

5. MINERAL RESOURCES

a. Aggregate

Setting: The project site is not identified on the Ventura County Resource Protection Map (1996) as a "mineral resource area", nor is the site used for mineral extraction.

Impact Discussion: The County Guidelines state that no project would have a significant demand on aggregate resources because there is a sufficient amount of aggregate resources to meet the local demand for the next 50 years.

As the proposed project site is not located in a "mineral resource area," and is not used as a mineral extraction site, no loss of mineral resources is anticipated as a result of project