

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

implementation. The decommissioning project will require the use of a minimal amount of aggregate products for slurring a portion of the pipe and filling voids. However, as there is a sufficient amount of aggregate resources to meet local demand for the next 50 years, this impact would be less than significant on a project-specific and cumulative basis. Additionally, the project would not block access to an aggregate resource.

Mitigation and Residual Impacts: Impacts are less than significant, therefore, no mitigation is necessary.

b. Petroleum

Setting: The proposed project site is not located within any permitted active or abandoned oil or gas fields. There are no know oil and gas facilities within the project impact area (Versar, 2008).

Impact Discussion: The County Guidelines state that no project would have a significant demand on petroleum resources because such resources are considered a world-wide, national and state resource which is beyond the scope of local governments to effectively manage or control.

As the proposed project site does not contain oil or gas wells, and would require only a small amount of petroleum products for decommissioning activities, the project would have a less than significant impact on petroleum products. Additionally, the proposed project would not hamper or preclude extraction of a petroleum resource. The project's contribution to impacts on petroleum resources is inconsequential and is, therefore, not significant on a project-specific or cumulative basis.

Mitigation and Residual Impacts: Impacts are less than significant, therefore, no mitigation is necessary.

6. BIOLOGICAL RESOURCES

The facilities and pipeline fixtures to be removed are on federal, state and municipal parklands in Palo Comado, Cheeseboro and Las Virgenes Canyons. These canyons are located in the Simi Hills and are part of a large habitat area comprised of about 50 square miles of mostly intact wildlife habitat. Much of this area is within the SMMNRA and is owned and managed as public parkland by the NPS, MRCA, RSRPD, and COSCA. The Simi Hills provide a corridor of largely undeveloped land linking the Santa Susana and San Gabriel Mountains to the north with the Santa Monica Mountains to the south and are considered critical to the long-term maintenance of natural ecological and evolutionary processes in the Santa Monica Mountains, which are largely isolated by urban and agricultural development (Penrod et al., 2006).

NPS performed a plant survey of the Cheeseboro Reservoir, Palo Comado Pump Station, and pipeline alignment through Palo Comado and Cheeseboro Canyons in February, 2008. A second survey took place in September, 2008, that also included Las Virgenes

Canyon. NPS also conducted a wildlife survey of the same areas in February, 2009. Additionally, the park's biologists have, over the last seven years, routinely surveyed the three canyons as part of their ongoing vegetation and wildlife monitoring programs. The park's biologists confirmed that, as of May, 2010, there are no changes in the circumstances of vegetation, habitat, or wildlife.

The two facilities and most of the pipeline appurtenances are located in disturbed grasslands that consist mainly of non-native annual grasses (*Avena* spp., *Bromus* spp., *Hordeum* spp.) and mustard (*Hirschfeldia incana*, *Brassica nigra*). Ruderal native species such as common aster (*Lessingia filaginifolia*), saw tooth goldenbush (*Hazardia squarrosa*) and California morning glory (*Calystegia macrostegia*) are scattered within the grasslands. Good quality habitat containing vegetation types of local importance occurs near the project area. These vegetation types include oak-arroyo willow riparian (*Quercus* spp. and *Salix lasiolepis*), arroyo willow riparian, live oak (*Quercus agrifolia*) and valley oak (*Quercus lobata*) woodlands, and coastal sage scrub dominated by purple sage (*Salvia leucophylla*) and California sagebrush (*Artemisia californica*). The majority of project work will occur in the non-native annual grassland and has no potential to encroach on or otherwise disturb these sensitive habitats. Several of the pipeline appurtenances do occur near sensitive habitats or plants.

The habitat associated with the pipeline facilities generally supports a diversity of wildlife that the NPS has documented through park wildlife monitoring programs. While the habitat is degraded in the vicinity of the tank and the pump station, the general expansive core habitat of the Simi Hills provides abundant habitat for shelter, roosting, foraging, young-rearing, and other activities that allow a diversity of species to thrive in the area, including large carnivores which are known to be particularly sensitive to habitat fragmentation.

Three major streams drain the Simi Hills: Palo Comado Creek, Cheeseboro Creek, and Las Virgenes Creek. The streams generally flow seasonally, with the level of flow and the length of time before ceasing to flow being dependent on rainfall patterns. Springs and seeps keep some pools filled along the streams throughout the year. In 2006, the highly invasive New Zealand mud snail was discovered in several drainages in the lower areas of Malibu Creek Watershed. Mud snails were found in Medea Creek, Malibu Lake, and multiple sites in Malibu Creek and Las Virgenes Creek, including the confluence of Las Virgenes and Malibu Creeks. Typically spread by humans on wet boots, waders and gear, New Zealand mud snails reproduce by cloning. A single snail is capable of producing a colony of 40 million in the course of a single year. In large numbers, these, algae-eating snails can completely cover a streambed and wreak havoc on local stream ecosystems, causing devastating impacts on local fish and amphibians. There is no easy way to eradicate the snail. Efforts are currently underway to develop education and outreach on mud snails, and to incorporate decontamination protocols into Santa Monica Mountains environmental monitoring programs.

Currently, the mud snail is not present in the drainages associated with the project, including in the stretch of Las Virgenes Creek where pipeline appurtenances slated for treatment are located. Therefore, mitigation measures are necessary to avoid introduction of the mud snail into any of the three major drainages during project work.

The proposed project is organized in this biological assessment into four project components: Cheeseboro Reservoir, Palo Comado Pump Station, pipeline appurtenances, and haul routes. The following sections describe the resource setting and observations gathered during plant and wildlife surveys for each project component.

Cheeseboro Reservoir. The tank is located on a two-acre graded pad on the eastern ridge of Cheeseboro Canyon. The pad and hillsides immediately surrounding the tank consist mainly of non-native annual grasses and mustard with a scattering of ruderal native species. There is a small stand of nodding needlegrass (*Nassella cernua*), foothill needlegrass (*N. lepida*), and purple needlegrass (*N. pulchra*) mixed with non-native annual grasses near the tank entrance gate and also growing from cracks in the asphalt ring around the tank. There is a stand of locally uncommon Booth's evening primrose (*Camissonia boothii*) along the Cheeseboro Ridge Trail just north of the intersection with the tank access spur trail.

The reservoir is surrounded by a six-foot chain link fence, thus preventing entry to the site by large mammals. Small mammals, reptiles, amphibians, and birds may be present. During the field survey conducted in February, 2009, by NPS wildlife biologists, ground squirrels (*Otospermophilus beecheyi*) were observed. A Cassin's kingbird (*Tyrannus vociferans*) was observed using the chain link fence enclosing the Cheeseboro tank as a hunting perch.

Palo Comado Pump Station. The area immediately surrounding the pump station is highly disturbed non-native annual grassland and mustard (*Sisymbrium* spp.). The only native species observed among the grasses is the commonly occurring Menzies fiddleneck (*Amsinckia menziesii*). There is a population of locally uncommon Palmer's rabbitbrush (*Ericameria palmeri* var. *pachylepis*) on the southeast corner of the intersection of the Palo Comado Trail and the pump station access spur.

Pipeline Appurtenances. Approximately 50 pipeline manholes, valves and other fixtures serve a 24-inch water conveyance pipeline, including large underground vaults at two locations. Most of the appurtenances are located in disturbed grasslands consisting mainly of non-native annual grasses and mustard (*Hirschfeldia incana*, *Brassica nigra*). Approximately six of the structures are near oak woodland, riparian or sensitive plant species that also provide habitat for amphibians, and raptors and other birds. One appurtenance is within a stand of invasive milk thistle (*Silybum marianum*).

Access and Haul Routes. All facilities and appurtenances to be removed are accessible by truck or on-foot via existing trails. All "trails" listed below are unpaved service roads for utility access and fire-fighting purposes, and are regularly used for authorized vehicle access. The trails used for vehicle access and hauling are described below and shown on Figure 7, Proposed Haul Routes.

Sunrise Meadows Connector Trail haul route (also known as the "Doubletree Connector") originates at Doubletree Road and terminates at the western edge of Palo Comado Creek (shown in yellow on Figure 7). The trail passes through non-native annual grassland and live oak woodland with a coastal sage understory. Poison oak (*Toxicodendron diversilobum*) is common and in the lower drainage, mulefat. The trail crosses Palo Comado Creek where there

is no culvert to allow dry crossing; hence the termination of the route on the west side of the creek.

Palo Comado Canyon Trail haul route originates at the northern terminus of Cheeseboro Road and continues to the Palo Comado Pump Station site at approximately 1.3 miles (shown in purple on Figure 7). The trail passes through non-native grassland and valley and live oak woodland with healthy coastal sage understory. Common understory species found along the trail are saw tooth goldenbush, mariposa lily (*Calochortus catalinae*), clarkias (*Clarkia* spp.) and foothill needlegrass.

Ranch Center Connector Trail haul route traverses the ridge between Cheeseboro and Palo Comado Canyons (shown in purple and red on Figure 7). The eastern slope of Palo Comado Canyon contains non-native annual grasses and coastal sage scrub with relatively sparse purple sage and California sagebrush. California walnut (*Juglans californica*) and laurel sumac (*Malosma laurina*) grow along the road. The western slope of Cheeseboro Canyon contains walnut with dense coastal sage scrub. Live oaks, laurel sumac and bush mallow (*Malacothamnus fasciculatus*) occur along the road, as well as a profusion of herbs and grasses including arroyo lupine (*Lupinus succulentus*), coast paintbrush (*Castilleja affinis*) spotted eucrypta (*Eucrypta chrysanthemifolia*) and foothill needlegrass. At its east end, the trail passes over an oak-willow drainage via a culvert.

Cheeseboro Canyon Trail haul route begins at the Cheeseboro Canyon Trailhead and terminates at the trail's intersection with Ranch Center Trail (shown in red on Figure 7). The trail passes largely through non-native annual grassland, and to a lesser extent valley and live oak woodland with young oaks and coastal sage scrub along the sides of the trail. In areas there is an overhanging oak canopy. Branches have been cleared to a height to allow passage of fire trucks (approximately 14 feet). The trail crosses Cheeseboro Creek at three locations, all associated with oak-willow riparian habitat with overhanging limbs. The creek crossings are developed with culverts designed to handle large utility vehicles and fire engines.

Cheeseboro Ridge Trail haul route continues from Cheeseboro Canyon Trail via the connector trail between the two trails, and terminates at the Cheeseboro Tank entrance road (shown in red on Figure 7). The trail passes through a short length of oak woodland with overhanging trees before climbing into a non-native grassland. There are no stream crossings.

Las Virgenes Canyon Connector Trail haul route connects Cheeseboro Ridge Trail with Las Virgenes Trail (shown as solid green line in Figure 7). The trail passes mainly through non-native annual grassland with occasional live oaks. There are no stream crossings.

Las Virgenes Canyon Trail haul route originates at the northern terminus of Las Virgenes Road and continues north to the intersection with the pipeline at approximately 1.4 miles (shown as dashed green line in Figure 7). The trail passes through valley oak savanna and crosses oak-sycamore-willow riparian habitat at several points. The non-native, invasive New Zealand mud snail has been documented in Las Virgenes Creek south of areas where pipeline appurtenances slated for treatment. Measures are being taken to reduce the opportunity for the snail to be transported to the upper area of Las Virgenes Creek or to the other drainages in the

project area where appurtenances are slated for treatment. Vehicular access along the route is prohibited owing to several wet crossings along the unpaved road leading to the work area. Hence, access over this route to reach pipeline appurtenances in Las Virgenes Canyon must be on foot.

a. Endangered, Threatened, Rare Species

Setting. The water conveyance infrastructure planned for removal crosses local, state, and federal management jurisdictions. All state and local regulations and ordinances are treated on federal parkland as if in effect, although the NPS is exempt as a federal agency. Federal jurisdiction applies only to the NPS ownership, although the legislated boundary for the SMMNRA includes a mix of state, local, and private land ownership within the boundary. NPS field surveys (2000-2009) and the California Department of Fish and Game (CDFG) Natural Diversity Data Base were used to identify the potential for threatened or endangered species to occur in the project vicinity. NPS staff made project-specific surveys for plants on February 19, 2008, and August 12, 2008, and for wildlife on February 23, 2009. Table C6-1 provides a summary of the status of threatened or endangered species reported from within five miles of the project site.

Table C6-1. Endangered, Threatened and Rare Species of the Simi Hills Area

Species	Status	Location
Braunton's milkvetch (<i>Astragalus brauntonii</i>)	Federal Endangered	Along pipeline, between Manhole 6 and Blow-off 4 approximately 15 feet from the former and 160 feet from the latter (NPS Survey, 2008) Cheeseboro Canyon Trail, 900 feet north of the pipeline. Palo Comado Canyon Trail (two stands), 0.6 miles north of the pump station. Cheeseboro Ridge Trail, 1.5 miles north of the reservoir. Simi Peak, 2.5 miles northwest of the pump station. Albertson Motorway, 2.5 miles north of the reservoir. (NPS Surveys 2000-2009.)
San Fernando Valley spineflower (<i>Chorizanthe parryi</i> var. <i>fernandina</i>)	State Endangered Federal Candidate	Ahmanson Ranch, 1.5 miles to the east of the eastern end of the pipeline (NDDDB, 2007)
Santa Susana tarplant (<i>Hemizonia minthornii</i>)	State Rare	Simi Peak Trail, 2.3 miles northwest of the pump station. Albertson Motorway, 2.2 miles north of the pump station (NPS Surveys 2000-2009)
Agoura Hills dudleya (<i>Dudleya cymosa</i> ssp. <i>agourensis</i>)	Federal Threatened	Ladyface Mountain, 3.5 miles to the south-southwest (NDDDB, 2007)
Lyon's pentachaeta (<i>Pentachaeta lyonii</i>)	State Endangered Federal Endangered	Ladyface Mountain, 3 miles to the south-southwest (NDDDB, 2007)
California red-legged frog (<i>Rana aurora draytonii</i>)	State Special Concern Federal Threatened	East Las Virgenes Creek, 0.75 to 1 mile to the east of the eastern end of the pipeline (NDDDB, 2007)

Impacts. Project impacts would be considered significant if they would substantially affect a rare, threatened, or endangered species of animal or plant, or habitat of the species.

Only one location for a listed species is associated with the proposed project. A stand of Braunton's milkvetch occurs between Manhole 6 and Blow-off 4 on the western slope of Cheeseboro Canyon. However, the stand is sufficiently distant from the work area required for sealing the appurtenances that it is unlikely to be adversely affected by project construction. All other known listed species are distant from the proposed project and its haul routes, and thus will not be impacted by the project.

Mitigation and Residual Impacts. No impacts to rare, threatened or endangered animal or plant species or habitat are anticipated. However, the National Park Service requires the following conditions to comprehensively protect all wild life (two words intended) within federal parkland, and to assure categorical exclusion from NEPA.

- BIO1** When a date certain for project initiation is set, District staff and NPS shall meet to arrange final field surveys for rare, threatened, or endangered plants and wildlife. The surveys shall be conducted at the most seasonably opportune time by qualified NPS biologists familiar with Braunton's milkvetch and other rare species of the area. If rare, threatened or endangered plant or animal species are found within the project work areas, the demolition methodologies shall be modified to avoid impacts (e.g, access through the sensitive area would be avoided, etc.). At the meeting, NPS shall provide a biologist's assessment of the acceptable demolition window for the Palo Comado pump station and Cheeseboro tank.
- BIO2** A meeting shall be scheduled prior to commencing decommissioning activities. Attendees shall include representatives from the NPS, Triunfo Sanitation District, and the selected contractor. The purpose of the meeting will be to jointly review project conditions and mitigation measures to gain a mutual understanding of how the conditions and mitigation measure shall be implemented, and to provide contact information for communication during the project. Additionally, participants at the meeting will cover other mitigation measures and conditions listed within this biological assessment and the rest of the IS/MND.
- BIO3** Orange construction safety fencing shall be placed between the known population of Braunton's milkvetch and Manhole 6 before decommissioning proceeds.

b. Wetland Habitat

Setting: The Army Corps of Engineers (ACOE) has jurisdiction over the areas identified below under the authority of the Section 404 of the Clean Water Act As defined under the June 2007 Interagency Guidance:

- Traditional Navigable Water (TNW);
- Wetlands adjacent to a TNW;
- Non-navigable tributaries that are Relatively Permanent Waters (RPW), including perennial streams and intermittent streams with continuous seasonal flow;
- Wetlands that directly abut a RPW; and
- With a fact-specific analysis determining a significant nexus with a TNW, non-navigable tributaries, wetlands adjacent to non-navigable tributaries that are not relatively permanent and wetlands adjacent but that do not directly abut a RPW are considered jurisdictional waters of the U.S.

TNWs are defined in Appendix D of the Rapanos Guidance and include but are not limited to be “navigable water of the United States”.

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

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

Federally jurisdictional wetlands are determined to be present if evidence of each of three criteria are observed (hydrophytic vegetation, hydric soils, and wetland hydrology). However, the U.S. Fish and Wildlife Service (USFWS) and the California Department of Fish and Game (CDFG) wetland definition requires that only one of the wetland criteria be present to define a wetland and assumes that wetland hydrology is present if hydric soils or hydrophytic vegetation are present. The County's wetland definition (Ventura County, 1992) focuses on vegetative and aquatic life that requires saturated or seasonally saturated soils.

Cheeseboro Reservoir. The reservoir site is on the west side of a grassy ridge and drains via sheet flow and two swales into Cheeseboro Creek approximately 2,000 feet to the southwest at 330 feet lower elevation. Cheeseboro Creek is ephemeral, with surface flow generally occurring for less than two months during the winter. Along the stretch receiving drainage from the tank site, the creek supports oak-willow riparian woodland (wetland vegetation). Hydric soils are not present in the creek. No waters of the U.S. are located in close proximity to the reservoir site. No wetland vegetation was found on or immediately around the reservoir during the field surveys.

Palo Comado Pump Station. Palo Comado Creek is approximately 360 feet west of the station infrastructure. The station site drains to the creek by sheet flow down a gentle, seven percent average slope broken by a depression formed by Palo Comado Trail (fire access road).

The area immediately surrounding the pump station is graded flat. Palo Comado Creek is ephemeral, with surface flow generally occurring for less than two months during the winter. The creek supports oak-willow riparian woodland (wetland vegetation) along the stretch nearest the station. Hydric soils are not present in the creek. No wetland vegetation was found on or immediately around the pump station during the field surveys.

Pipeline Appurtenances. Pipeline air-vacs (A), blow-offs (B), manholes (M) and valves (V) occur in three drainages: Palo Comado Creek (A2-4, B2-3, M2-5, V2-3), Cheeseboro Creek (A5-10, B4-8, M6-14, V4-10), and Las Virgenes Creek (A11-15, B9-12, M15-18, V11). Two locations include large underground vaults (M8-10, M14), one of which is outside but adjacent to the Cheeseboro Creek riparian zone. Refer to Photo Log in Appendix A. All but approximately six of these appurtenances are located in upslope areas of disturbed habitat consisting mainly of non-native annual grassland and mustard.

Haul Routes. Seven trails to be used as haul routes were identified in the general setting discussion at the beginning of this assessment. All "trails" listed below are unpaved service roads for utility access and fire-fighting purposes, and are regularly used for authorized vehicle access.

Three of the trails include stream crossings: Cheeseboro Canyon Trail, Ranch Center Trail, and Las Virgenes Canyon Trail. Cheeseboro Canyon Trail and Ranch Center Trail have culverts at all stream crossings. The culverts are designed to handle utility trucks and fire engines. Las Virgenes Canyon Trail has wet crossings over Las Virgenes Creek. The New Zealand mud snail, a non-native invasive aquatic species, is present in the creek south of the project area, and efforts are in place to prevent its spread to other creeks in the Simi Hills and Santa Monica Mountains. Hence, no motorized vehicular traffic is allowed over this trail.

Cheeseboro Ridge Trail, Palo Comado Canyon Trail, and Sunrise Meadows Connector Trail are upland trails that do not have stream crossings, although Palo Comado Canyon Trail parallels the creek within 50 to 100 feet.

Cheeseboro Ridge, Ranch Center Connector, and Las Virgenes Canyon Connector trails have short stretches of steep grade (20%), and require routine maintenance to control erosion.

Impact Discussion: The Ventura County Guidelines provide the following significance threshold for the assessment of impacts to wetland habitat: a significant impact would result from the direct reduction of or a substantial indirect impact to a significant wetland habitat.

Policy 1.5.2.3 of the Ventura County General Plan requires that discretionary development proposed to be located within 300 feet of an intermittent stream or spring must be evaluated by a qualified biologist to determine potential impacts to wetland habitats. Discretionary development that would result in significant impacts to significant wetland habitats is prohibited unless mitigation measures are adopted that would reduce the impact to a less than significant level. For the purposes of this initial study, significant wetland habitats are

defined as performing one or more functions considered as important to the public interest (33 CFR 320.4):

- Wetlands which serve significant natural biological functions, including food chain production, general habitat and nesting, spawning, rearing, and resting sites for aquatic or land species;
- Wetlands set aside for study of the aquatic environment or as sanctuaries or refuges;
- Wetlands, the destruction or alteration of which would detrimentally affect natural drainage characteristics, sedimentation patterns, salinity distribution, flushing characteristics, current patterns, or other environmental characteristics;
- Wetlands that are significant in shielding other areas from wave action, erosion, or storm damage. Such wetlands are often associated with barrier beaches, islands, reefs and bars;
- Wetlands which serve as valuable storage areas for storm and flood waters;
- Wetlands which are groundwater discharge areas that maintain minimum base flows important to aquatic resources and those which are prime natural recharge areas;
- Wetlands which serve significant water purification functions; and,
- Wetlands which are unique in nature or scarce in quantity to the region or local area.

Resource agencies recognize the value of wetlands due to the extremely small area of wetlands remaining in California. However, no threshold has been developed to determine the significance of wetland loss for the purposes of CEQA.

The wetlands associated with the project are the three main blue-line creeks associated with three major canyons in the Simi Hills: Palo Comado, Cheeseboro, and Las Virgenes Creeks. Additionally, one blue-line side drainage off Las Virgenes Creek is within the project footprint. The creeks are protected as federal and state parkland and therefore, have been set aside in the 16,000-acre core habitat owned and managed by the NPS and the Santa Monica Mountains Conservancy/Mountains Recreation and Conservation Authority for the purpose of riparian wetland habitat preservation and environmental study. As such, these creeks and associated riparian habitat may be deemed significant wetlands under the provisions of the Ventura County General Plan. Impact avoidance is the priority in this sensitive parkland setting. Impact evaluation for each of the four project components follows.

Cheeseboro Reservoir. As stated above in the setting discussion, there are no waters of the U. S. or wetlands near the tank site. Therefore, no construction-related or operational loss of wetlands would occur. No significant indirect impact to waters of the U.S. or wetlands through off-site transport of sediment or erosion are expected to occur due to the distance of the site from such resources and limited nature of the proposed activity.

Palo Comado Pump Station. The pump station is situated approximately 360 feet east of Palo Comado Creek. Project activities are limited to the immediate station footprint and do

not approach Palo Comado Creek. Therefore, no direct impacts to waters of the U.S. or significant wetlands are anticipated.

Ground disturbance would be minimal and there will be no changes made to the existing level grade. Asphalt and foundation removal will be accomplished by shallow scraping. Shallow foundations more than one-half foot deep will be left in place. A large underground vault (25 feet x 20 feet x 10 feet deep) will be filled to ground level with broken concrete and rebar and not more than 50 cubic yards of clean-source sand and gravel. After demolition work is finished and the vault capped with clean sand and gravel, the site will be hydroseeded with an NPS-approved mix of native species. Areas of open soil left after the removal of the station will be quickly occupied by the germinating hydroseed mix and surrounding non-native annual grasses and forbs, thus reducing to insignificance the possibility of erosion and sediment transmission toward Palo Comado Creek. However, during the ground disturbing phase of the decommissioning, erosion could occur that may result in transport of sediment to the Palo Comado Creek. Therefore, indirect impact to wetlands through off-site transport of sediment or erosion is considered to be potentially significant.

Pipeline Appurtenances. The majority of pipeline appurtenances are located in uplands at least several hundred feet from wetlands. The appurtenances will be accessed by foot from vehicles parked on the haul routes, and treatment accomplished with hand-held power tools. Their treatment will incur no construction-related or operational loss of waters of the U.S. or wetlands, and no indirect impact to wetlands through off-site transport of sediment or erosion would occur.

The two large vaults will be filled with cement slurry delivered via a hose from trucks parked on the haul route. Similar to the treatment of the other pipeline appurtenances, there would be no construction-related or operational loss of waters of the U.S. or wetlands, and no indirect impact to wetlands through off-site transport of sediment or erosion would occur.

Approximately six of the appurtenances are located adjacent to or within riparian habitat and are addressed as follows.

Manhole 3 is located above the western edge of Palo Comado Creek, which supports sycamore-walnut-willow riparian canopy with a high quality native vegetation understory, including wild rose (*Rosa californica*) and mugwort (*Artemisia douglasiana*). The creek also provides habitat for a variety of riparian-dependent amphibians and bird species. The appurtenance can be approached across the adjacent non-native grassland, thus fully avoiding contact with the riparian habitat. The selected demolition option involves removing the manhole cover, knocking remaining concrete into the hole, and filling the structure with clean soil level with grade. No ground disturbance is proposed, and no contact with the riparian habitat is necessary.

Blow-off 11 is located at the edge of a seasonal blue-line side drainage to Las Virgenes Creek that supports an oak-willow overstory with an understory containing wild rose (*Rosa californica*) and mugwort (*Artemisia douglasiana*). An associated above-ground blow-off is located under a dead fallen willow trunk. The demolition option calls for sealing the manhole

cover and leaving the appurtenance in place. The appurtenance can be approached on foot without crossing the riparian area.

Blow-off 12 and associated manholes are located along Las Virgenes Creek in a well-developed willow riparian woodland with a native understory including mulefat (*Baccharis salicifolia*), mugwort and California melic grass (*Mellica imperfecta*). There is a seep present and areas of soil remain wet throughout the summer. The creek provides habitat for a variety of riparian-dependent amphibians and bird species. Treatment calls for sealing the manhole cover and leaving the appurtenances in place. Access would be on foot into the riparian area.

No motorized equipment will enter the area and there will be no ground disturbance beyond that created by foot traffic. Therefore, treatment of appurtenances at these three riparian-adjacent locations will incur no construction-related or operational loss of waters of the U.S. or wetlands. However, a significant impact to the biological integrity of the creek habitats would potentially occur owing to the possibility of introduction or transfer of New Zealand mud snail from construction worker foot gear, or the use of hand tools that may have been used previously at an infested area.

Haul Routes. Specific haul routes as identified on Figure 7 and sanctioned by the NPS would be utilized during the decommissioning project. Although the routes are all referred to as “trails” because of their predominant use as recreational trails, they are unpaved roads constructed for vehicular traffic. As stated in the project description (Section 9.0), no wheeled vehicle stream crossings will be allowed. Two of the haul routes run parallel to and at times within 50 feet of Cheeseboro and Palo Comado Creeks and two haul roads cross drainages via culverts (see setting discussion above). All of these roads are maintained to support passage of fire trucks and are regularly used by park vehicles. It is estimated that approximately 110 truck round-trips over the haul routes will be required to remove structural material from and provide upland fill to the reservoir and pump station sites. An estimated 60 trips would be needed for Cheeseboro Tank demolition and 50 trips for Palo Comado Pump Station demolition. Additional trips by small truck and light vehicles will be required to transport crew and to seal pipeline appurtenances. There will be approximately five truck round-trips per day, with potentially 20 truck round-trips on the peak demolition days of work. The haul roads as constructed and maintained can support this level of light and heavy vehicle use without generation of excessive dust, erosion rills, or movement of sediment. NPS also prohibits vehicular use of the roads during rainy weather that causes muddy road conditions. However, potential erosion into the drainages could result in unacceptable levels of added sedimentation to both the local stream setting, as well as eventually into the downstream setting associated with sensitive aquatic coastal species (see Section c. Coastal Habitat). Sedimentation is acknowledged as the most common and problematic non-point source pollutant in the drainages of the SMMNRA. This is a potentially significant impact.

Cumulative. Due to the existing impairments to local surface waters and the potential for the project to occur simultaneously with other projects which have the potential to result in erosion and sedimentation, the project’s impacts on wetlands due to erosion and sedimentation may be considered cumulatively significant.

Mitigation and Residual Impacts. This project will not result in creation of new structures or require grading. There will be no filling or alteration of wetlands or changes made that affect natural drainage characteristics, sedimentation patterns, salinity distribution, flushing characteristics, current patterns, or other environmental characteristics. There is, however, the potential to significantly impact wetlands during use of haul routes and ground disturbance associated with decommissioning activities. Mitigation measures GWQ1 through GWQ3 (see Section C.4, Water Resources) would reduce these impacts. The NPS requires conditions in addition to the above-referenced mitigation measures to comprehensively protect all wild life (two words intended) within federal parkland and downstream, and to assure categorical exclusion from NEPA. These requirements are outlined as measures BIO4 through BIO7 below. Mitigation measures BIO8 through BIO10 address the potential presence of the invasive non-native New Zealand mud snail. With implementation of all of these measures, project impacts to wetlands would be less than significant on a project-specific and cumulative basis.

- BIO4** All vehicles shall remain within existing roadbeds and utilize existing turnaround areas.
- BIO5** The District shall put the project contractor(s) on notice that haul routes within the SMMNRA may be closed during rainy weather. The District shall arrange a communication protocol with the NPS and project contractor(s) to stay informed of road conditions, including possible closures. Such arrangements shall be made during the pre-construction meeting described in mitigation measure BIO2.
- BIO6** The District shall ensure that the contractor(s) working within the SMMNRA shall monitor road conditions during the project. If heavy pulverization, significant rut development, or damage to culverts is observed, measures to prevent further damage shall be implemented, and/or a post-project repair program arranged in consultation with the NPS. In the event a repair program is necessary, the District shall provide all materials requested by the NPS, and NPS will provide the labor. Likewise, the District shall be responsible for repairing road ruts or other damage to the road corridor after receiving direction from the NPS on appropriate repair actions.
- BIO7** The District will spray areas described in the Project Description for the Cheeseboro Tank and Palo Comado Pump Station sites with a hydroseed mix of native plants recommended by NPS and DFG.
- BIO8** Las Virgenes Creek, Cheeseboro Creek, and Palo Comado Creeks and any relevant side drainages shall be surveyed for presence of the non-native invasive New Zealand mud snail. The surveys shall be conducted by a qualified NPS biologist at the appropriate time prior to decommissioning activities and at locations selected by the biologists. The NPS biologist shall inform the project and construction managers of the findings and provide

guidance on steps necessary to avoid either new introduction or further spread of the mud snail.

BIO9 Mud snail absent. For drainages that continue to be free of the New Zealand mud snail based on NPS surveys prior to scheduled work, the construction supervisor shall be responsible for ensuring that any employees entering a stream channel are wearing shoes, waders, pants, or other articles of clothing are deemed free from mud snails. Similarly, any hand tools or machinery shall be deemed free from mud snails.

BIO10 Mud snail present. For drainages that show presence of the New Zealand mud snail based on NPS surveys prior to scheduled work, the following actions shall be taken to avoid the spread of invasive species to other drainages, whether within the project area or any stream channels outside the project area:

a. Project employees shall acquire temporary clothing, foot gear, or coverings for such, that can be used for the duration of the project, then disposed of after work is completed. Such clothing, foot gear, or coverings shall, under no circumstances, be used at any other locations involving contact with stream channels, whether or not within the project area.

b. Alternatively, clothing or foot gear can be placed in a freezer for at least 48 hours. The NPS has a freezer available for this use, if necessary. The NPS biologist will inform the project and construction managers of the location of the freezer.

c. The NPS biologist will also inform the construction manager of how to disinfect small power tools or equipment, or any machinery that has come into contact with the stream channel. Options will include, but may not be limited to, freezing, washing with disinfectants, or steam-cleaning at 140°F.

c. Coastal Habitat

Setting. Palo Comado, Cheeseboro and Las Virgenes Canyons are located approximately nine miles from the Coastal Zone. The creeks associated with the three canyons ultimately drain into Malibu Creek and into Santa Monica Bay. Malibu Creek hosts the federally listed endangered steelhead trout (*Oncorhynchus mykiss*), and Malibu Lagoon is inhabited by the federally listed endangered tidewater goby (*Eucyclogobius newberryi*). Malibu Creek and Malibu Lagoon are federally designated critical habitat for the two endangered species.

Impact Discussion. The Ventura County Guidelines provide the following significance threshold for the assessment of impacts to coastal habitat. According to the State Coastal Act and County's Local Coastal Program, virtually any reduction of, or indirect impact to, a coastal habitat could be considered significant.

The project is located far enough from the coast and of sufficiently small scale such that impacts to coastal resources will not occur. As there would be no project-specific impact to coastal resources, the project would not contribute to a cumulative coastal resource impact.

Mitigation and Residual Impacts. There would be no impact; therefore, no mitigation is required.

d. Migration Corridors

Setting: The facilities and pipeline fixtures to be removed cross the Simi Hills in an east-west direction, traversing Palo Comado, Cheeseboro and Las Virgenes Canyons in the middle reaches of the drainages. The lower Cheeseboro Canyon area funnels toward Liberty Canyon, where open space comes to a bottleneck near the Liberty Canyon/U.S. 101 underpass. The combined protected parkland in the Simi Hills, which include the three canyons, exceeds 16,000 acres. The extensive protected open space not only provides suitable habitat for a migration corridor, but provides core habitat more accurately identified as a habitat linkage between the Simi Hills and Santa Monica Mountains, conveying the availability of foraging, roosting, hunting, nesting, and other habitat needs for wildlife to not only move, but to thrive. The Liberty Canyon underpass is considered by the Santa Monica Mountains Conservancy as "...the highest-quality potential crossing area along the 101 freeway" (Edelman, 1990). The original basis for this claim was primarily the geographical location of the underpass, where large open space areas of the SMMNRA occur both north and south of the U.S. 101 freeway. Indeed, recent studies by the NPS (Ng et al., 2004) have documented usage of this underpass by wildlife. The importance of this potential wildlife corridor prompted Congress to approve expansion of the SMMNRA boundary in 2002 by 3,697 acres, including 390 acres in Liberty Canyon to "...protect critical habitat required for the free movement and migration of wildlife..." In addition, the Santa Monica Mountains Conservancy (Mountains Recreation and Conservation Authority) has purchased several properties adjacent to the Liberty Canyon/U.S. 101 underpass to preserve the wildlife corridor. The NPS continues to monitor wildlife passage at Liberty Canyon, and most recently (2009), documented movement of a radio-collared mountain lion through the underpass. Overall, the acquisition of extensive parkland has been driven in large part to protect the significant amounts of open space that provide habitat as well support the migration corridor at Liberty Canyon.

Impact Discussion: The Ventura County Guidelines provide the following significance threshold for the assessment of impacts to migration corridors. A significant impact to a migration corridor would result if a project would substantially interfere with the use of said area by fish or wildlife. This could occur through elimination of native vegetation, erection of physical barriers, or intimidation of fish or wildlife via introduction of noise, light, development or increased human presence.

There is no habitat loss involved in the removal of the fixtures and the disturbance is of a relatively small area, temporary and will only be conducted during the day. Therefore, no impacts on migration corridors are anticipated. As such the project would not contribute to any cumulative impacts on migration corridors.

Mitigation and Residual Impacts: There would be no impact; therefore, no mitigation is required.

e. Locally Important Species/Communities

Setting: Based on project-specific field surveys by the NPS performed in 2008 and 2009, ongoing NPS wildlife research and vegetation mapping projects in the Simi Hills since 2000, field surveys in the Oak Park area by Scott & Wier (1982), bird sightings in upper Las Virgenes Canyon by Hardesty (2009), and review of the CDFG Natural Diversity Data Base, special-status species found in the project vicinity are listed in Table C6-2.

Impact Discussion: The Ventura County Guidelines do not provide a specific significance threshold for the assessment of impacts to locally important species/communities. However, Ventura County has adopted a Tree Preservation Ordinance, focusing on protecting mature native oak and sycamore trees. The NPS, as a federal agency, may act independently of local and state ordinances and regulations. However, the enabling legislation for the national recreation area directs cooperation among the federal, local, and state agencies with jurisdiction and authority to protect the national recreation area's resources. Therefore, the NPS abides by local ordinances, such as Ventura County's Tree Preservation ordinance. For the purposes of this assessment, project impacts would be considered significant if they would substantially affect a locally important species, or habitat for the species. No natural habitat loss will occur as the result of this project. Impacts may occur only from demolition activities or the loss of structures utilized by animal species for shelter.

Live and valley oak trees and the Catalina mariposa lily were the only special status plant species observed near the pipeline alignment or along haul roads during the February and September, 2008 field surveys. Earlier NPS surveys (2002 -2008) that included portions of the pipeline alignment and haul roads found no additional special status plants.

Oak trees occur along the haul roads and in places overhang the roads. These trees have been pruned to a height of 15 feet to provide clearance for fire trucks. Clearance is sufficient to permit passage of trucks required for the project. All of the haul roads are long-established and highly compacted. The use of trucks for this project will not result in additional compaction or result in disturbance to the root zones beyond that which already exists. There will be no significant impact to the oaks.

Catalina mariposa lily co-occurs with Braunton's milkvetch on the grassy slope between Manhole 6 and Blow-off 4. The stand is sufficiently distant from the work area required for sealing the appurtenances that it will not be affected by demolition activities.

Booth's evening primrose and Palmer's rabbitbrush are two locally rare plant species (have no special status) that occur near to the project area. The former occurs along Cheeseboro Ridge Trail just north of the reservoir turnoff and the latter occurs along Palo Comado Trail, by the pump station turnoff. Both could be potentially impacted by trampling. This is considered an adverse, but less than significant impact.

Table C6-2. Locally Important Species/Communities

Species	Status	Location
Coast live oak (<i>Quercus agrifolia</i>) and valley oak (<i>Quercus lobata</i>):	Protected under Ventura County Tree Protection Ordinance	Common along and the length of Palo Comado and Cheeseboro Trails. In some locations overhanging the trails. Occur along Sunrise Meadow Connector Trail (NPS Surveys 2000-2009).
Chaparral nolina (<i>Nolina cismontana</i>)	Considered rare or endangered (1B) by the California Native Plant Society	On ridge between Palo Comado and Cheeseboro Canyons, approximately ¼ mile north of the pipeline (NDDB 2007; NPS Surveys 2000-2009).
Brewer's calandrinia (<i>Calandrinia breweri</i>)	Considered a plant of limited distribution (4) by the California Native Plant Society	On ridge between Palo Comado and Cheeseboro Canyons, approximately ¼ mile north of the pipeline (NPS Surveys 2000-2009).
Catalina mariposa lily (<i>Calochortus catalinae</i>)	Considered a plant of limited distribution (4) by the California Native Plant Society	Along pipeline, between Manhole 6 and Blow-off 4 approximately 15 feet from the former and 160 feet from the latter. Co-occurs with Braunton's milkvetch. (NPS Survey, 2008).
Southern California black walnut (<i>Juglans californica</i>)	Considered a plant of limited distribution (4) by the California Native Plant Society	Scattered throughout the Palo Comado, Cheeseboro, and Las Virgenes Canyons, but none in close proximity to the project area. Large stand on north slope of hill ¼ mile south of pipeline between Palo Comado and Cheeseboro Canyons (NPS Surveys 2000-2009).
Booth's evening primrose (<i>Camissonia boothii</i>)	No special status, but uncommon in the SMMNRA	Along the Cheeseboro Ridge Trail immediately north of the intersection with the tank access spur trail.
Palmer's rabbitbrush (<i>Ericameria palmeri</i> var. <i>pachylepis</i>)	No special status, but uncommon in the SMMNRA	Southeast corner of the intersection of the Palo Comado Trail and the pump station access spur. Palo Comado Trail south of its intersection with the Ranch Center Connector Trail. (NPS Surveys 2002-2008).
Cooper's hawk (<i>Accipiter cooperii</i>)	California Species of Special Concern	Observed nesting in Cheeseboro and Palo Comado Canyon oak groves as recently as 2009 (NPS surveys 2000-2009).
Golden eagle (<i>Aquila chrysaetos</i>)	California Species of Special Concern	Occasionally sighted in Palo Comado and Cheeseboro Canyons. A nest was observed on a powerline pylon in the Simi Hills in 1988 (NPS Surveys 2000-2009).
California horned lark (<i>Eremophila alpestris actia</i>)	California Species of Special Concern	Occasionally observed in Cheeseboro Canyon (NPS surveys 2000-2009).
Loggerhead shrike (<i>Lanius ludovicianus</i>)	California Species of Special Concern	Observed in upper Las Virgenes Canyon, 2006 and 2009 (Hardesty 2009).

Species	Status	Location
Southern California rufous-crowned sparrow (<i>Aimophila ruficeps canescens</i>)	California Species of Special Concern	Observed in upper Las Virgenes Canyon, 2005 and 2007 (Hardesty 2009).
Bell's sage sparrow (<i>Amphispiza belli</i>)	California Species of Special Concern	Reported from Oak Park in 1982. May occur in purple sage scrub in Palo Comado and Cheeseboro Canyons (Scott & Weir 1982).
Lark sparrow (<i>Chondestes grammacus</i>)	Special Animal	Observed in upper Las Virgenes Canyon, 2006, 2008, and 2009 (Hardesty 2009).

Cooper's hawks have been observed nesting in Palo Comado Canyon riparian areas and may forage within Cheeseboro and Palo Comado Canyons. The project would not result in the loss of suitable habitat for this species. However, removal of the pump station during the breeding season may adversely affect breeding success of Cooper's hawk (if present) owing to disturbance near nesting sites and potential nest abandonment. This impact is potentially significant.

Golden eagles have been occasionally sighted in the Simi Hills and may forage within the project area. The NPS has not documented any nesting golden eagles in the general Simi Hills area since 1988. The project will not result in any habitat loss and is not expected to significantly impact this species. However, should there be nesting golden eagles in the vicinity of the pump station, disturbance during demolition may cause nest abandonment. This impact is potentially significant.

Annual grassland is considered suitable habitat for California horned lark, loggerhead shrike, and lark sparrow. These bird species were not observed during the spring survey or in previous NPS surveys, but could occur in the project vicinity during the breeding season. However, the poor quality weedy habitat surrounding the reservoir and pump station makes occupancy unlikely and the small scale of disturbance associated with the project is unlikely to result in temporary loss of breeding territory for California horned lark, loggerhead shrike, or lark sparrow, if present. Therefore, impacts to these species are considered less than significant.

Southern California rufous-crowned sparrow and the Bell's sage sparrow, listed as California Species of Special Concern, may nest in habitats adjacent to the project removal sites and pipeline. Therefore project activity conducted during the breeding season may adversely affect the breeding success of these species, which is considered a potentially significant impact.

A Cassin's kingbird, a bird protected by the Migratory Bird Treaty Act, was observed by the NPS using the chain link fence enclosing the Cheeseboro Tank as a hunting perch. This fence line is likely used as a hunting perch by other flycatchers as well. Removal of the fence may affect some individuals utilizing it, but should pose a less than significant impact, because the natural landscape provides adequate alternative hunting perches in this area.

Numerous migratory birds protected under California Fish and Game Code Section 3503 and the Migratory Bird Treaty Act may nest in habitats adjacent to the project removal sites and pipeline (Hardesty, 2009). Therefore project activity conducted during the breeding season may adversely affect the breeding success of these species that reside temporarily in the project area and at locations throughout North and South America that are also being impacted by loss of habitat, human activities, and global warming. Such disturbance is considered a potentially significant impact on a project-specific and cumulative basis.

Several species of small mammals including valley pocket gophers (*Thomomys bottae*), California ground squirrels (*Otospermophilus beecheyi*), and western harvest mice (*Reithrodontomys megalotis*) may inhabit the areas directly adjacent to the Cheeseboro Tank and Palo Comado Pump Station. None of the known small mammal species in this area are of special concern. The impact of disturbance caused from removal of these structures is considered less than significant.

There is a significant animal trail running along the pipeline from the Palo Comado Pump Station to Cheeseboro Canyon Trail. There is evidence of this trail being used by mule deer (*Odocoileus hemionus*), coyotes (*Canis latrans*), gray foxes (*Urocyon cinereoargenteus*) and bobcats (*Lynx rufus*). The relatively large home ranges of these animals, and the minimal area, amount of disturbance, and short work timeframe expected along the pipeline indicate the project poses a less than significant impact on these animals.

Pacific tree frogs (*Pseudacris regilla*) and western toads (*Bufo boreas*) are known by the NPS to inhabit the riparian areas around the underground vault accessed by Manholes 8, 9, and 10, and the pipeline that parallels the utility road bypass around Cheeseboro Canyon Trail. Disturbance around these structures has the potential to adversely affect some local amphibian species, but they are not species of special concern and the impacts are considered less than significant.

Valve 11 and Manhole 18, located in Las Virgenes Canyon east of and outside the riparian zone, is surrounded by a heavy infestation of milk thistle (*Silybum marianum*), an invasive species of local concern that forms monotypic stands in the area. Milk thistle produces copious small seeds that are easily spread by equipment and footwear. Invasive weed species represent a significant threat to the integrity of natural communities in Palo Comado, Cheeseboro and Las Virgenes Canyons, and to all other park sites and native habitat areas in the SMMNRA. Non-native species such as yellow star thistle (*Centaurea solstitialis*) also degrade the recreational experience because of their long spines that can stab through even the thickest of brush pants. Nationwide, invasive non-native plant species are enabling wildland fires in ecosystems normally resistant to fire, such as the desert habitat of Joshua Tree National Park and Saguaro National Park. Transport of invasive plants such as perennial pepperweed (*Lepidium latifolium*) and yellow star thistle (*Centaurea solstitialis*) by vehicles and equipment has been documented by NPS staff. The large number of vehicles and equipment that will be utilized for this project, coming from construction sites in the area, presents a possibility that new invasive plant seed will be transported into the canyons. Spread of invasive plant species to new locations is potentially significant both on a project-specific and cumulative basis.

Mitigation and Residual Impacts: The following mitigation measures are required to reduce potentially significant project-specific and cumulative impacts to locally important species/communities to less than significance. Additionally, the National Park Service requires these conditions to comprehensively protect all wild life (two words intended) within federal parkland, and to assure categorical exclusion from NEPA. With implementation of the following measures the project impacts to locally important species would be reduced to less than significant on both a project-specific and cumulative basis.

- BIO11** Decommissioning activities shall not be conducted during bird nesting season, February 1 – August 31. (Slurrying activities within County paved road right of way are excluded from this restriction.) If not feasible to perform demolition outside of the season, a bird survey shall be performed prior to commencing work during bird nesting season. If threatened and endangered (T&E) or otherwise sensitive birds are found to be nesting in the proposed work areas, District staff shall formulate measures to avoid or mitigate negative impacts. Measures may include not working in specific areas, or waiting to commence work until nesting season is over.
- BIO12** Prior to decommissioning activities, the District and or District's contractor(s) shall meet on-site with a NPS plant biologist to obtain guidance on the fencing of the Palmer's rabbitbrush near the Palo Comado Pump Station and the Booth's evening primrose near Cheeseboro Tank. The District shall be responsible for proper installation, maintenance and ultimate removal of the protective fencing.
- BIO13** Prior to entering parkland for the first time, equipment vehicles that were previously used at an off-road project site shall have the undercarriage and tires washed to make sure no non-native invasive plant propagules are carried into parkland.
- BIO14** All persons who have entered the area of milk thistle infestation shall examine and clean all debris from their footwear and clothing upon leaving the site to avoid spreading seeds to other locations. The District shall be responsible for ensuring that all persons working on the project within the SMMNRA are educated with respect to the proper identification of milk thistle through provision of photographs of the plant and identification in the field.
- BIO15** No heavy equipment shall be allowed in the riparian areas.
- BIO16** If the NPS-selected haul routes include trees with limbs that cause less than sufficient vertical or horizontal clearance for truck passage, the District will notify NPS and select with NPS approval a qualified arborist to trim the limbs as needed to prevent tree damage from truckloads. The trimmed limbs will be left on site.

- BIO17** To the maximum extent feasible, reduce driving and parking in the vicinity of the Palo Comado pump station to reduce damage to ground squirrel and possibly pocket gopher burrows.
- BIO18** Avoid excessive trampling in the vicinity of the appurtenances near the three stream crossings - Palo Comado Creek, Cheeseboro Creek, and Las Virgenes Creek - to reduce impacts to burrowing amphibians. Similarly, avoid moving downed wood, rocks or other features near any pipeline appurtenances along the Gas Company access road.

Implementation of mitigation measure BIO3 (orange construction safety fencing placed to protect the Braunton's milkvetch) will also assure protection of the mariposa lily further reducing any possibility of an impact to this plant.

7. AGRICULTURAL RESOURCES

a. Soils

Setting: The project site is comprised of three main components, the Cheeseboro Tank site, Palo Comado Pump Station and segment of the Lindero Feeder (pipeline). None of these areas are in agricultural production. However, historically, prior to incorporation of Palo Comado Canyon and Cheeseboro Canyon into the National Park system, these areas were used for animal grazing. It is likely that other portions of the project area were likewise used for grazing prior to the establishment of the Oak Park community.

Impact Discussion: The County of Ventura Guidelines state that projects having an agricultural land use designation that result in the loss of over 5 acres of prime soils (according to the important farmland inventory classification) would result in significant project-specific impacts to agriculture. In addition, any direct or indirect loss of agricultural soils is considered a significant contribution to the cumulative loss of agricultural land.

The proposed project would not directly or indirectly result in the loss of agricultural land as it is limited to the decommissioning of existing facilities. Therefore, the project would not result in a project-specific or cumulative impact on agricultural soils.

Mitigation and Residual Impacts:

No impact would result, therefore no mitigation is required.

b. Water

Setting: The general setting provided in a. above applies to this issue.

Impact Discussion: The following thresholds pertain to water quality and quantity and are provided in the County Guidelines.