Pothole Trailhead Parking Area

Initial Study – Mitigated Negative Declaration

prepared by

United Water Conservation District
106 North 8th Street
Santa Paula, California 93060

prepared with the assistance of

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

April 2018

Rincon Consultants, Inc.
Environmental Scientists Planners Engineers
www.rinconconsultants.com

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Initial Study

1 Project Title

Pothole Trailhead Parking Area

2 Lead Agency Name and Address

United Water Conservation District
106 North 8th Street
Santa Paula, California 93060

3 Contact Person and Phone Number

James D. Grisham, Engineering Manager
805-525-4431

4 Project Location

The project site is in eastern Ventura County, approximately 11 miles northeast of the unincorporated town of Piru, California. The site is located on the northwest side of Lake Piru off of Piru Canyon Road (Forest Service Road 4N13). The site is situated on United Water Conservation District's Lisk Ranch property within a 320-acre designated open space parcel (APN 0160180025). The site is situated just north of the private Rickenbacker Ranch Road, adjacent to Piru Canyon Road between Lisk Creek and a north-facing hill. Figure 1 shows the regional location of the project site, and Figure 2 shows the location of the project site.

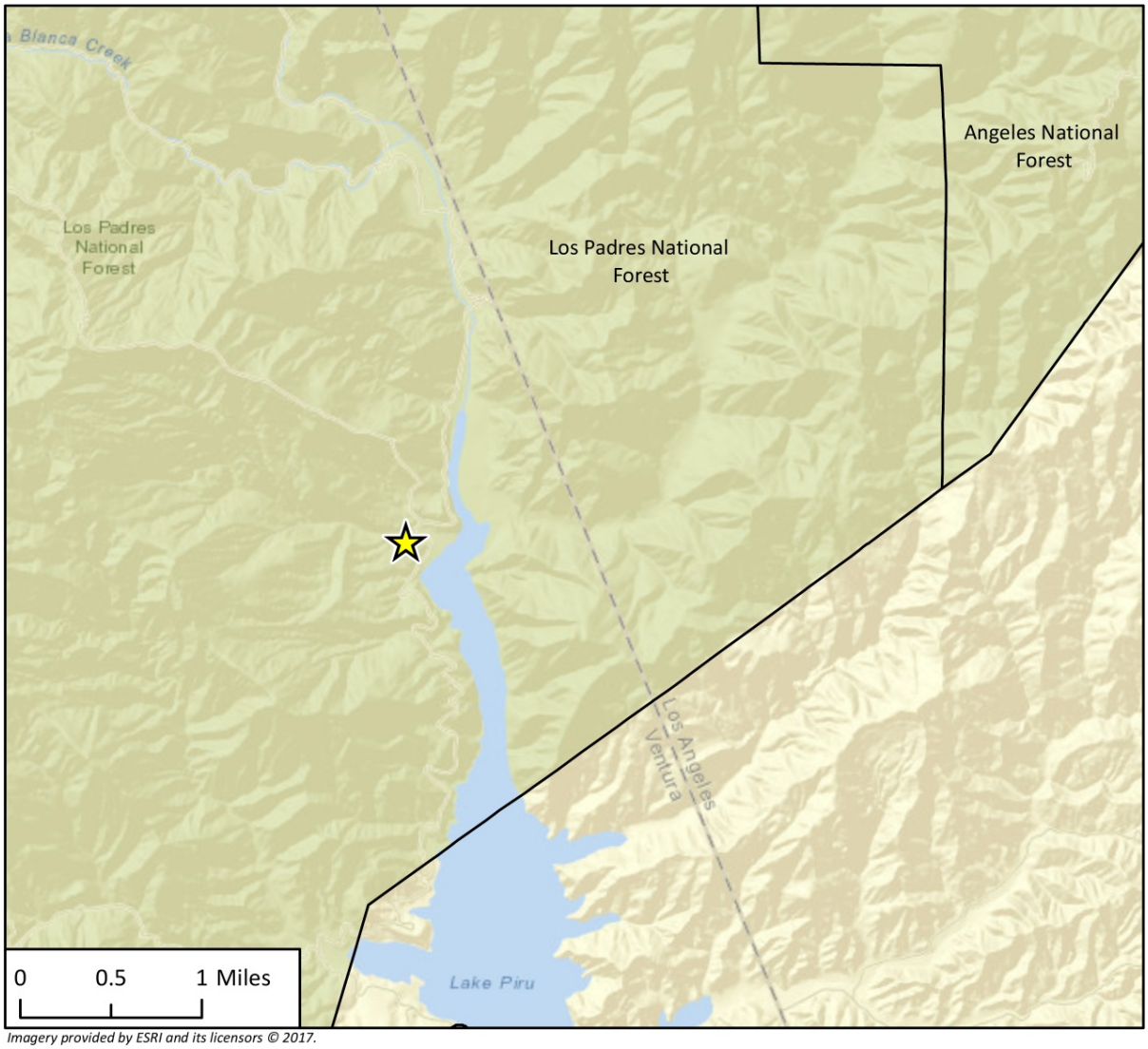
5 Project Sponsor's Name and Address

United Water Conservation District
106 N. 8th Street
Santa Paula, CA 93060

6 Existing Setting

The proposed Pothole Trailhead Parking Area facility ("proposed project") site is currently covered by native grasses and mature trees, including native oaks. Although undeveloped, the entire site is previously disturbed by human activities primarily associated with the original Lisk Ranch homestead, which is owned by United (as mentioned above [APN 0160180025]). The existing access road and parking area at this site have previously been graded and vegetation cleared (United 2016b). The site is not currently used for parking or access to the trail system. The western part of

Figure 1 Regional Location



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Additonal data provided by US Forest Service, 2014.

Project Location

N

Fig 1 Regional Location

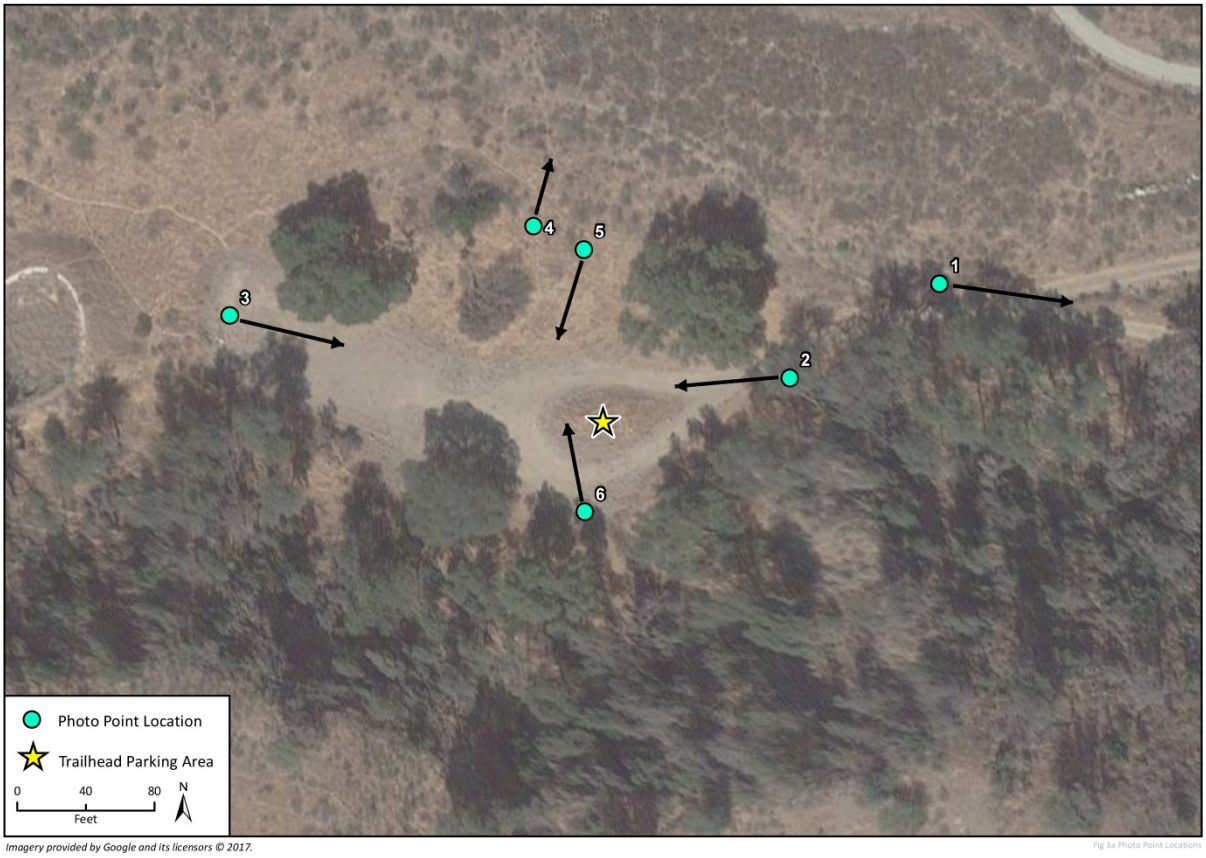
Figure 2 Project Location

the project site is presently used for apiary activities[1] by a third-party, under lease to United, which would be terminated with implementation of the project. Historically, the project site was occupied by the Lisk Ranch homestead. There is a remnant concrete watering hole/irrigation pond to the west of the proposed trailhead parking area. The pond was from the original Lisk Ranch homestead and has deteriorated to such an extent that ponding no longer occurs. Figure 3 provides site photos showing existing conditions.

The site is in the general vicinity of the existing trailhead for the Forest Service Pothole Trail (No. 18W04), maintained by the United States Forest Service ("Forest Service"), which is an agency of the United States Department of Agriculture (USDA). The existing trail enters the Sespe Wilderness Area in the southern part of the Los Padres National Forest. The site is located near the former Forest Service Blue Point Campground.

Additional discussion is provided below in Section 9, under "Existing Conditions".

Figure 3 Site Photos



[1] "Apiary activities" refer to beekeeping, and include the operation and maintenance of beehives.

Photo 1: View to the east down the spur road to the left and the main road to the right.

Photo 2: View to the west from the end of the access road over the proposed trailhead parking area.

Photo 3: View to the east from the western border of the project site, near the site of the proposed restroom facilities.

Photo 4: View to the north from the edge of the project site, towards the existing Pothole Trail.

Photo 5: View to the north across project site, from the south edge of the site.

Photo 6: View to the south across the project site, near the entrance to the proposed spur connector trail.

7 General Plan Designation

Open Space

8 Zoning

Open Space (O-S); Scenic Resource Protection (SRP)

9 Background

United Water Conservation District ("UWCD" or "United") proposes to construct a trailhead parking area facility on United's Lisk Ranch property, to improve public access to the existing Forest Service Pothole Trail (No. 18W04).

United is required to provide trail access improvements as part of its Santa Felicia Trail Project Federal Energy Regulatory Commission (FERC) license (No. 2153-012, Article 411). Therefore, United prepared the Santa Felicia Project Recreation Trail Plan ("Trail Plan"), originally dated November 5, 2013. The original Trail Plan determined that development of trail improvements on the east side of Lake Piru would not be feasible because there are no Forest Service trails or roadways in the Angeles National Forest property on the east side of the lake, and other existing roadways on the east side of the lake are not accessible to the public.

Through consultation with FERC regarding the original Trail Plan, United was directed to consult with the Forest Service, California Department of Parks and Recreation (CDPR), and other interested parties to explore alternative hiking opportunities and provide a modified plan, or provide justification that no alternative hiking opportunities were feasible. Public comments received on the Trail Plan focused on enhanced trail access on the northwest end of Lake Piru, in the Los Padres National Forest (United 2016a).

United continued consultation with the Forest Service, CDPR, and hiking-related stakeholders regarding alternative hiking opportunities, with a focus on improving access opportunities on the northwest end of Lake Piru in the Los Padres National Forest. That consultation led to a project concept that provides vehicular access to the Pothole Trail through the following measures:

1. United to provide access through the existing gate on Piru Canyon Road at Reasoner Canyon, either by opening or removing the gate;
2. United to relocate the gate at the Juan Fernandez Launch Ramp facility to just beyond the turn-out to the proposed project and immediately before the crossing over Lisk Creek; and
3. United to identify a preferred location and construct a trailhead parking area facility on United's Lisk Ranch property that will serve the trailhead for the Forest Service's Pothole Trail (No. 18W04).

At the time of preparation of this analysis, the gate at Reasoner Canyon and the gate at the Juan Fernandez Launch Ramp facility are in place and opened manually as needed to facilitate access as needed; however, these gates would be locked open in place/removed by United as part of the proposed project to facilitate public access to the proposed project. Relocating the gate from the Juan Fernandez Launch Ramp facility to just prior to the crossing of Lisk Creek would allow public vehicles on Piru Canyon Road to turn around in the proposed project and prevent public vehicular

access beyond that point. The relocation of this gate as part of the proposed project would occur in consultation with the Forest Service. The new gate would be located on United's property.

Alternate locations for the trailhead parking area facility were considered prior to selection of the project site assessed in this Initial Study. Selection criteria for the trailhead parking area facility included the following: size, grade, terrain, existing vegetation, proximity to Piru Canyon Road, potential for flood inundation, and proximity to the existing Pothole Trail. Of the sites considered, two were identified as meeting the selection criteria: one at the entrance to the private Rickenbacker Ranch road, and one near the former Lisk Ranch homestead site. Both locations are located adjacent to Piru Canyon Road. The Lisk Ranch homestead site was determined to be favorable due to size, access, existing drainage patterns, and distance from private residences. Therefore, this is the site identified as the trailhead parking area facility and assessed in this Initial Study.

As a separate action from this proposed project, the Forest Service is currently performing an assessment to determine whether the existing Pothole Trailhead should be relocated, as discussed in United's Trail Plan Update (November 1, 2017). If the trailhead is relocated by the Forest Service, it will be provided on Forest Service lands along Piru Canyon Road, near the existing trailhead; as such, United's proposed project to provide an improved trailhead parking area facility is not dependent upon the location of the actual trailhead.

10 Existing Conditions

Figure 3 provides site photos showing existing conditions at the project site. The trailhead parking area facility (i.e., the Lisk Ranch homestead site), is located in T5N, R18W, Sec 15, approximately 600 feet west of Piru Canyon Road. The site is located at the base of a small canyon that is oriented west to east and drains into Lisk Creek. The existing parking area is out-sloped[2] which directs natural drainage to Lisk Creek, adjacent to the north of the parking area. The site is of an approximately level grade. The Federal Emergency Management Agency (FEMA) has not delineated the 100-year floodplain for this area.

Following is a description of the project area provided in a design analysis for the proposed project (Trails Unlimited 2017). This characterization of the project site and area were visually confirmed by Rincon Consultants, Inc. during site visits conducted in June 2016.

> "Soils in this area are easily eroded and susceptible to debris flows, especially when severe wildfire events are followed by storms. Approximately 25 percent of the watershed area consists of rock outcrop. Soils are shallow to moderately shallow. Average annual precipitation is 19 inches, and runoff potential for the watershed is high, due to the soil characteristics.
>
> Adjacent to the northern boundary of the proposed parking area, the stream channel is deeply incised, by approximately 12 to 15 feet. The depth of streambed incision may increase further upstream as the gradient increases and geomorphology changes. The streambed has been previously disturbed by the Forest Service, using bulldozers after the last El Niño event; those activities created various berms ranging in size, with the nearest one to the project [site] approximately 20 feet by 100 feet. The substrate of the incised channel is unsorted with a high percentage of rubble that is too large for bedload, and was therefore likely deposited as a debris

[2] "Out-sloping" is a design feature that shapes the ground surface to direct surface stormwater flows and prevent the concentration of flows that could produce rilling, gullying, and rutting.

flow in response to a substantial storm event. There is a lack of cobble in the eroded stream channel, likely having been deposited downstream during a large storm event. The streambanks are unstable and provide a source of sediment that is carried downstream.

A large plume of sediment was deposited in the floodplain above and below the existing Piru Canyon Road during a large storm event that followed a wildfire in the upper canyon. In response to this damage, the Forest Service built two concrete fords on the roadway, one at the primary stream crossing, and one on a secondary flow path. The roadway and fords are collecting sediment that is repeatedly cleared and deposited along the roadway and in the floodplain. These fords are set at levels that are inhibiting channel aggradation."

The proposed project site is currently used by a private party to maintain a bee apiary, under a special use permit with United. The site is tiered at two levels by about four feet in elevation and is generally sloped toward the valley bottom. Up-canyon from the bee hives (to the west) is a concrete-lined watering hole/ irrigation pond, approximately 100 feet by 65 feet in size. The pond was from the original Lisk Ranch homestead and has deteriorated over time such that ponding no longer occurs. Therefore, although remnants of the pond are still present, primarily in the form of broken pieces of concrete from the original pond lining, it does not retain water on-site and is no longer functional.

11 Site Access

Under current conditions, access to the Pothole Trail (No. 18W04) is provided via the Forest Service's Piru Canyon Road, from United's Lake Piru Recreation Area. Little to no maintenance has occurred on Piru Canyon Road since 2003, when repairs were made following the 2003 Piru Fire.

There are currently two United gates across Piru Canyon Road, prior to the trail access points assessed under this proposed project:

- One intermittently locked gate at Reasoner Canyon.
- One locked gate adjacent to Juan Fernandez Launch Ramp Facility, at the northern boundary of the Lake Piru Recreation Area.

The locations of these gates are identified on Figure 4. The Juan Fernandez Launch Ramp Facility gate has been closed to public access since 2000 as a resource protection measure for the endangered arroyo toad. This gate prevents vehicle access except by individuals authorized by the Forest Service, including private landowners, state, federal, and local agencies, and consultants thereof. The gate at Reasoner Canyon and the gate at the Juan Fernandez Launch Ramp Facility are currently in place but will be removed or locked open by United as part of the proposed project.

There is also a gatehouse at the entrance to the Lake Piru Recreation Area (4780 Piru Canyon Road, Piru), where a gatehouse attendant greets visitors and collects day-use fees for the recreation area. After entering the Lake Piru Recreation Area at the gatehouse, recreationists desiring to use the Pothole Trail (No. 18W04) must pass through United's gate on Piru Canyon Road at Reasoner Canyon, then park at the Juan Fernandez Launch Ramp Facility just before the locked gate. From the parking area at the Juan Fernandez Launch Ramp Facility, recreationists currently proceed on foot past the locked gate. It is then approximately three miles along the Forest Service-owned portion of Piru Canyon Road (across Forest Service property, United property, and a portion of the Rancho Temescal property) to the existing Pothole Trail trailhead. As noted above, this portion of Piru

Canyon Road has been unmaintained since 2003; any future maintenance or modification of the road would be the responsibility of the Forest Service.

Figure 4 Site Access

From Piru Canyon Road, two spur roads currently provide access to the proposed trailhead parking area facility (shown on Photo 1 in Figure 3). Both roads are currently damaged by rutting, resulting from surface flows during storm events. The lower (northern) road provides a secondary flow path for the site-adjacent stream by intercepting stream flow during storm events; this flow diversion also increases the velocity of flow and contributes a source of sediment to the flow. This existing spur road will be abandoned in-place, such that the only access to the project site will be provided via the upper (southern) road. This road is outside of the stream's flow path but is also deeply rutted in some places where previous storms have resulted in surface flows along the roadway. The road will be repaired during project implementation.

12 Proposed Project

The proposed project includes improvements to the trailhead parking area facility, near the former Lisk Ranch homestead. These improvements include resurfacing of the existing site to provide parking for vehicles and horse trailers, improvements to an existing spur road providing access to the site from Piru Canyon Road (referred to as "main road" shown on Photo #1), decommissioning of a secondary spur road providing current access to the site from Piru Canyon Road, and

repositioning/removal of existing gates on Piru Canyon Road to facilitate access. All improvements included under the project are described below.

1. **Road Improvements and Access.** Road improvements and access features that would be implemented under the proposed project include the following:
   - Upgrade approximately 600 feet of the southern spur road which provides access to the trailhead parking area, including improved drainage consisting of at-grade crossings at Lisk Creek, and widening of the road to 16 feet. No culvert crossings would occur as part of the project. Additional improvements that would be implemented on this spur road as part of the project include:
     - Construction of a swale on the northern side of the road,
     - Out-sloping of the road, and
     - Raising of the road bed to provide for adequate drainage.

   These improvements will facilitate natural drainage patterns and reduce the risk of head-cuts and water diversion.
   - Close the northern spur road, which currently diverts stream flows, and rehabilitate the roadway through rip/scatter activities of native vegetation. The ground surface will be scarified perpendicular to contours, with sub-soiling and soil scarification used to reduce compaction and increase filtration. Natural drainage patterns of the area will be maintained wherever practicable.

   A protective cover consisting of native vegetation consistent with United's Vegetation and Noxious Weed Management Plan (United, 2010) will be placed on disturbed areas to prevent accelerated erosion during construction or before the next growing season.

   Vehicular access to areas outside of the trailhead parking area facility will be blocked using fencing or the strategic placement of boulders. Access to areas outside of the trailhead parking area facility will also be discouraged using signage with clearly posted information about access roads and trails.

2. **Parking Area Features.** The proposed project would improve approximately one acre of the existing trailhead parking area to create 14 parking spaces and up to four pull-through spaces for vehicles with trailers. Building materials would be obtained from local sources. Improvements would include:
   - Clear existing trailhead parking area to facilitate parking
   - Install packed gravel on the parking area surface, using material obtained from local source(s)[3]
   - Install hitching posts for equestrian use
   - Install wildlife-deterrent trash receptacles
   - Install informational signage in the trailhead parking area including but not limited to:
     - Maps of the recreation area,
     - Warnings of potential hazards including wildlife (e.g. snakes and large predators), and
     - Guidance for recycling and trash disposal.

[3] The County CUP identifies this as an existing unpaved parking area. The Recreation Master Plan states that the parking at the Lisk Ranch site (location of the proposed project) will not be paved. Discussion of why paving of the site is not proposed as part of the project is discussed in this analysis; please see Section 9, *Hydrology and Water Quality*.

- Install signage on Piru Canyon Road to warn motorists of narrow and uneven road conditions, to ensure public safety for motorists traveling along Piru Canyon Road between Reasoner Canyon and the proposed project site
- Install split-rail fence to protect one mature oak tree in the parking area, and along the western portion of the parking area (where the apiary activities are currently present) to prevent vehicular access
- Place barriers in the form of split-rail fence or corral-style fencing to define the parking area and drainage features; some large boulders may also be used to define the project site perimeter (likely obtained from Ojai or Camarillo sources)

3. **Restroom Facilities.** The project includes installation and maintenance of restroom facilities in the trailhead parking area. Toilets would be a vault design, concrete pre-cast, with the outside of the restroom facility painted in a neutral color scheme consistent with similar facilities in the recreation area. The restrooms would be located at the far end of the trailhead parking area, where the bee apiary activities are currently conducted under a lease agreement with United; with implementation of the proposed project, the apiary will be relocated to a more appropriate location and may continue to occur under a lease agreement with United. Fencing along the western portion of the parking area will be removed to accommodate placement of the restroom facilities, which will provide the same effect as the fence, of preventing vehicular access outside of the parking area.

4. **Drainage Improvements.** Drainage improvements will be implemented under the proposed project, to maintain natural patterns of surface runoff to the maximum extent practicable, and to prevent the persistence of existing drainage-related damage such as rutting in the roadway. As such, the project would place perimeter fencing (split-rail or corral-style) along the northern and western sides of the trailhead parking area. In addition, a surface flow dissipater would be placed just beyond the perimeter fencing, to reduce the velocity of stormwater flows leaving the site. A drainage structure (flow dissipater) will be placed every 50 feet around the site perimeter. Slope of the parking area will be approximately two percent.

5. **Access Improvements.** As part of the project United will remove (or lock open) the existing access gate at the Juan Fernandez Launch Ramp Facility, and will concurrently install a new access gate just beyond the existing Pothole Trail trailhead, before the Lisk Creek crossing which leads to Blue Point Campground. Installing a gate at this location will control public vehicle access into areas where sensitive toad/frog species have the greatest potential for crossing roads, in order to protect habitat suitability and individual occurrences. The existing gate at Reasoner Canyon will also be removed (or locked open) as part of the proposed project.

13 Project Design Features

Best Management Practices (BMPs) are included as design features of the proposed project, to avoid or minimize potential impacts. These include standard construction BMPs implemented by United's engineering department. BMPs that would be implemented during project construction and/or operation (as applicable) are provided below.

Construction BMPs

- Develop and implement an erosion control and sediment plan (such as a Stormwater Pollution Prevention Plan [SWPPP] or equivalent) that covers all disturbed areas including borrow, stockpile, fueling, and staging areas used during project construction.
- Establish and maintain construction area limits to the minimum area necessary for completing the project and confine disturbance to within the area.
- Install sediment and stormwater controls before initiating ground-disturbing activities.
- Slow, disperse, and divert stormwater runoff away from impermeable surfaces (including the parking area surface – as described above, the parking area surface will be covered with packed gravel or base material).
- Implement seasonal shutdown of project operations or when severe or successive storms are expected.
- Allow temporary refueling and servicing only at designated locations, situated away from surface water or riparian areas.
- Develop or use existing fuel and chemical management plans (for example, spill prevention control and countermeasures [SPCC], spill response plan, emergency response plan) when developing the management prescription for refueling and servicing sites.
- Schedule construction activities to avoid direct soil and water disturbance during periods of the year when heavy precipitation and runoff are likely to occur.

Operation and Maintenance BMPs

- Post and maintain clear signage in the trailhead parking area which states the hours of operation for public use, as applicable (gate to the parking area will be closed during or in anticipation of severe storm events). Signs will be posted at each end of the spur road providing access to the parking area, to ensure that recreationists are aware of any planned gate closures.
- Close access to the trailhead parking area during or in anticipation of severe storm events.

14 Construction

Construction of the proposed project is expected to occur over a period of approximately one month. To the extent feasible, construction will be scheduled to avoid months when sensitive species are more active such as during breeding season; individual species and associated mitigation measures are discussed below in the Biological Resources section of this Initial Study.

During construction activities for the proposed project, vehicles and equipment will be staged in the trailhead parking area, on the side of the road (positioned to not impede traffic on Piru Canyon Road), and/or at the boat launch parking area. Activities within active drainage channels will be avoided. Ground-disturbing activities during storm events or when storm events are anticipated will also be avoided. Water will be applied to the ground surface during ground-disturbing activities for dust suppression.

Implementation of the project features described under “Proposed Project” will require the use of a variety of vehicles and equipment, for transport of materials to and from the site, as well as for on-site activities at the trailhead parking area. Table 1, below, identifies the types of equipment anticipated to be required during project construction, and the approximate duration of use for each.

Table 1 Construction Equipment and Use

Equipment Type	Duration of Use	Location	Engine Type
Drill Rig	One day, 8 hrs/day	Job Site	Diesel
Backhoe	One day, 8 hrs/day	Job Site	Diesel
Dozer JD 450	2 weeks, 8 hrs/day	Job Site	Diesel
Excavator JD 365	3 weeks, 4 hrs/day	Job Site	Diesel
Roller Compactor 5 ton	3 weeks, 3 hrs/day	Job Site	Diesel
Water Truck 3000 gallon	4 weeks, 8 hrs/day	Job Site	Diesel
4 Transport Trucks - Base	2 days, 1.5 hrs /trip, 4 trips/day	Delivery Only	Diesel
2 Transport Trucks - Rock	3 days, 1.5 hrs /trip, 2 trips/day	Delivery Only	Diesel
¾ ton Pick-up Truck	4 weeks – 1 hrs. per day	Daily	Diesel

No live trees will be removed during project construction. One dead oak tree (fallen) currently located on-site will be repositioned along the border of the parking area, to maintain habitat currently provided by the fallen tree. No work would occur in the stream.

15 Operation and Maintenance

Operation and maintenance of the proposed project will include regular trash removal, cleaning of the restroom facility, and general activities such as repairing damaged fences or signage as needed. Trash from the trailhead parking area facility will be trucked to and disposed of at a local solid waste disposal facility. All project features, including the packed gravel surface, boundary fencing, and drainage features, will be inspected during regular maintenance visits, and repaired as needed.

Operation and maintenance of the project would not involve work in the stream. Signage would be posted to direct recreationists to not cross the stream, to protect its integrity and avoid potential issues such as erosion and sedimentation. From the parking area, recreationists may walk along Piru Canyon Road to the existing trailhead (or to the relocated trailhead, should the Forest Service reposition it under separate action from this proposed project). As discussed previously, United would remove (or secure in an open position) the access gate at the Juan Fernandez Launch Ramp Facility and install a new access gate on Piru Canyon Road past the proposed trailhead parking area facility, near the Lisk Creek crossing, in coordination with the Forest Service. This would restrict public vehicular access farther along Piru Canyon Road and protect sensitive frog/toad habitat on Forest Service property. Potential impacts associated with biological resources, including sensitive habitats and species occurrences are addressed in this Initial Study under “Biological Resources”.

Access gate modifications implemented by United are intended to increase legal access to public facilities and trails. Access to private property in-holdings along Piru Canyon Road is restricted from public use by private property rights and trespassing laws. Similarly, laws exist to discourage illegal activities associated with poaching or illegal hunting.

Maintenance of the restroom facilities within the proposed parking area facility would include regular access by large vehicles to pump out waste from the vault toilets and transport to an approved disposal facility. These trucks would access the site via Piru Canyon Road. Piru Canyon

Road is currently in disrepair and has not been maintained by the Forest Service since 2003; therefore, signage would be posted along the roadway to caution of potentially hazardous road conditions such as rutting and sharp turns. As previously described, maintenance of Piru Canyon Road between the Juan Fernandez Launch Ramp Facility and the proposed parking area facility is the responsibility of the Forest Service.

The proposed parking area would not be locked at night, in the interest of public safety. Signage would be placed in the trailhead parking area and on the spur road to clearly indicate public access and parking areas, and to discourage trespassing. United personnel will conduct regular and frequent patrols of the project area, and will report signs of unauthorized access, trespassing, poaching, and/or vandalism to the appropriate law enforcement authorities.

16 Required Approvals

The proposed project would require an order approving the CEQA findings by FERC. The proposed project may also require a Conditional Use Permit (CUP) Modification by the County of Ventura. Review and approval is also required from FERC, the USDA Forest Service, and the California Department of Parks and Recreation (CDPR). Approval from other public agencies is not anticipated to be required. The restroom construction will require United to obtain a zone clearance and building permit from the County of Ventura.

17 Surrounding Land Uses and Setting

Surrounding land uses include open space, private land (individual parcels with residential cabins and hunting uses), and United's Lake Piru Recreation Area. The project is located in eastern unincorporated Ventura County near the unincorporated community of Piru.

Environmental Factors Potentially Affected

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

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

Determination

Based on this initial evaluation:

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

■ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions to the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

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

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☒ I find that although the proposed project could have a significant effect on the environment, because all potential significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

James D. Grisham — Signature

April 25, 2018 — Date

James D. Grisham — Printed Name

Engineering Manager — Title

☐ I find that although the proposed project could have a significant effect on the environment, because all potential significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature	Date
Printed Name	Title

Environmental Checklist

1 Aesthetics

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project have any of the following impacts?				
a. Substantial adverse effect on a scenic vista	☐	☐	☐	■
b. Substantial damage to scenic resources, including but not limited to trees, rock outcroppings, and historic buildings along a state scenic highway	☐	☐	☐	■
c. Substantially degrade the existing visual character or quality of the site and its surroundings	☐	☐	■	☐
d. Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area	☐	☐	■	☐

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

The proposed project is designed to be aesthetically comparable to exiting conditions. The project is located within the viewshed of Lake Piru, which is designated as a scenic viewshed by the County of Ventura. However, the project is not located on a scenic vista and would not introduce any new structures with potential to obstruct a scenic vista. The project would install a restroom facility located at the western border of the site; this structure would be painted in a neutral color and is not located in an area where is would obstruct existing views in the area. The project is not located on a ridge line and would not impede existing views of Lake Piru or mountains in the Sespe Wilderness. Therefore, no impact to a scenic vista would occur.

NO IMPACT

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

There are no historic buildings or state scenic highways in the project area. Mature trees would be protected in-place, and one dead (fallen) tree would be repositioned on-site for safety of vehicles and to protect existing habitat provided by the fallen tree. There are no rock outcroppings on or within view of the project site. The project is designed to minimize impact to the existing visual character of the site, including using packed gravel and a color scheme on the restroom facility that

will be aesthetically consistent with the area. Therefore, the project would not damage scenic resources and no impact would occur.

NO IMPACT

c. Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

During construction activities, the presence of construction vehicles and equipment would be visible from trails in the project area; such effects would be temporary and limited to the construction period.

As discussed above, under criteria (a) and (b), the project is designed to be aesthetically consistent with existing conditions. The visual character of the site would be altered by the presence of packed gravel, fencing to protect mature oak trees, drainage features consisting of dissipation areas on the site boundary, informational signage, and a restroom facility located on the western project boundary. The project may result in increased usage of the trailhead parking area as well as the Pothole Trailhead (existing or relocated, at the discretion of the Forest Service), due to better access and the availability of a parking area; the presence of vehicles would temporarily alter visual character at the trailhead parking area. However, visual receptors are mobile recreationists who would otherwise have to hike into the project area past parking lots and other parked cars. Furthermore, recent use as an apiary and past use as a parking area for the Pothole Trail prior to the road closure in 2000 had impacts on the visual quality of the site and mobile recreational visitors. Therefore, the project would not substantially alter or degrade the existing visual character or quality of the site and its surroundings. Potential impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

The project site is currently not lit and does not include reflective surfaces. Implementation of the project would not include the installation of nighttime lighting or reflective services. During construction, vehicles and equipment that could produce glare will be present on the site, and intermittent glare from the temporary glare from these vehicles and equipment may be visible from trails in the project area. Additionally, the project may result in increased usage of the trailhead parking area as well as the Pothole Trailhead, due to better access and availability of parking areas; the increased presence of vehicles may also create an intermittent source of glare from trails in the area. Due to the intermittent and site-specific nature of such effects, potential impacts associated with glare would be less than significant.

LESS THAN SIGNIFICANT IMPACT

2 Agriculture and Forestry Resources

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

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

The project is not located on Prime Farmland, Unique Farmland, or Farmland of Statewide Important. The project would not convert or otherwise affect existing Farmland. No impact would occur.

NO IMPACT

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

The project site is not zoned for agricultural use or designated under a Williamson Act contract. The project would not convert or otherwise conflict with agricultural uses. No impact would occur.

NO IMPACT

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

The project site is previously disturbed and not zoned as forest land or timber land. The project would not convert or otherwise conflict with forest land or timber land. No impact would occur.

NO IMPACT

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

As noted above for criterion (c), the project would not affect forest lands. No impact would occur.

NO IMPACT

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

As noted under the preceding criteria, the project would have no impact on Farmland or agricultural uses. No impact would occur.

NO IMPACT

3 Air Quality

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project have any of the following impacts?				
a. Conflict with or obstruct implementation of the applicable air quality plan	☐	☐	☐	■
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation	☐	☐	☐	■
c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)	☐	☐	■	☐
d. Expose sensitive receptors to substantial pollutant concentrations	☐	☐	■	☐
e. Create objectionable odors affecting a substantial number of people	☐	☐	■	☐

The project site is in the South Central Coast Air Basin (the SCCAB) and is under the jurisdiction of the Ventura County Air Pollution Control District (VCAPCD). As the local air quality management agency, VCAPCD is required to monitor air pollutant levels to ensure that applicable air quality standards are met and, if they are not met, to develop strategies to meet the standards.

Depending on whether the standards are met or exceeded, the SCCAB is classified as being in "attainment" or "nonattainment." The part of the SCCAB where the project site is located is in nonattainment for both the federal and State standards for ozone, and State standards for particulate matter 10 micrometers or less in diameter (PM_{10}). Therefore, the SCCAB currently exceeds several State and federal ambient air quality standards and is required to implement strategies that would reduce pollutant levels to recognized acceptable standards. In 2017, VCAPCD adopted an Air Quality Management Plan (AQMP) that provides a strategy for the attainment of State and federal air quality standards.

The most recent VCAPCD comprehensive publication regarding air quality assessment is the *Ventura County Air Quality Assessment Guidelines* (Guidelines, 2003). The Guidelines recommend significance thresholds for projects proposed in Ventura County, which state that air quality impacts are considered significant if a proposed project would meet one of the following:

- Generate daily emissions exceeding 25 pounds of reactive organic compounds (ROG) or nitrogen oxides (NO_X);

- Be inconsistent with goals and policies of the Ventura County AQMP;
- Create a human health hazard by exposing sensitive receptors to toxic air emissions;
- Create objectionable odors affecting a substantial number of people.
- Cause an exceedance or making a substantial contribution to an exceedance of an ambient air quality standard[4]; or
- Directly or indirectly cause the existing population to exceed the population forecasts in the most recently adopted AQMP.

The Guidelines consider projects that generate more than 25 pounds per day of ROG and NO_x to jeopardize attainment of the federal and State ozone standard and thus have a significant impact on air quality. The 25 pounds per day threshold for ROG and NO_x are not intended to be applied to construction emissions because they are temporary.

The VCAPCD has not established quantitative thresholds for particulate matter either for operation or construction. However, a project that may generate fugitive dust emissions in such quantities as to cause injury, detriment, nuisance, or annoyance to any considerable number of persons, or which may endanger the comfort, repose, health, or safety of any such person, or which may cause or have a natural tendency to cause injury or damage to business or property is considered to have a significant air quality impact by the VCAPCD. This threshold is particularly applicable to the generation of fugitive dust during construction grading operations.

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

The VCAPCD Guidelines state that project consistency with the AQMP can be determined by comparing the actual population growth in the county with the projected growth rates used in the AQMP. However, if there are more recent population forecasts that have been adopted by the Ventura Council of Governments (VCOG) where the total county population is lower than that included in the most recently adopted AQMP population forecasts, lead agencies may use the more recent VCOG forecasts for determining AQMP consistency.

Activities under the proposed project that would generate air quality emissions include the use of equipment, machinery, and vehicles during the project construction period, and the potential for increased visitation to the site by vehicles during the operational period. However, the project is intended to improve public trail access and would not lead to any growth in population. Therefore, the project would not contribute to an exceedance of the VCOG projected population growth forecast and would comply with the AQMP. No impact would occur.

NO IMPACT

b. Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

The area of the SCCAB where the project is located is currently a nonattainment area for both the federal and State standards for ozone and the State standards for PM_{10}. When population growth exceeds the forecasts upon which the AQMP is based, emission inventories could be surpassed,

[4] "Substantial" is defined as making an existing exceedance measurably worse. Since the VCAPCD does not provide a numerical value for "substantial contribution", changes in carbon monoxide concentrations were determined to be significant and substantial for this analysis if concentrations including project traffic caused an exceedance of the California one-hour standard of 20 parts per million (ppm) carbon monoxide or the federal and State eight-hour standard of 9.0 (ppm) is exceeded. This latter standard follows the South Coast Air Quality Management District (SCAQMD) definition of significance for CO impacts (SCAQMD 2015).

which could affect attainment of standards. Nonattainment may result from past and ongoing urban and rural development that causes emissions to exceed the air basin's capacity for dispersal and removal of the air pollutants. However, as indicated above in the discussion for criterion a), the proposed project would not cause population forecasts to be exceeded. Therefore, the project would not result in delayed attainment of air quality standards nor would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation. No impact would occur.

NO IMPACT

c. *Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors)?*

The potential for the project to result in a net increase of any criteria pollutant for which the region is in nonattainment is discussed below for construction and operation, respectively.

Construction Emissions

Development of the proposed project would result in temporary air quality effects due to the use of heavy construction equipment, construction truck trips, and the associated generation of fugitive dust. Site preparation and grading typically generate the greatest amount of emissions due to the use of grading equipment. The proposed project's construction-related impacts were calculated using the California Emissions Estimator Model (CalEEMod, Version 2016.3.2) software program. Emissions were based on parameters such as the duration of construction activity, area of disturbance, and anticipated equipment used during construction, using information provided by United. Additionally, the approximate percentage of paved and unpaved road was input into the model in order to account for vehicles traveling along Piru Canyon Road to and from the proposed parking area. It was also assumed that the speed in which construction vehicles and equipment would travel on the unpaved portion of the road would not exceed 10 miles per hour. The modeling results are included in Appendix A and are summarized in Table 2.

Table 2 Construction Emissions (pounds/day)

Pollutant	Maximum Daily Emissions	Significance Threshold	Significant Impact?
ROG	2.2	25	No
NO_x	23.4	25	No
CO	11.3	n/a	No
SO_x	<0.1	n/a	No
PM_{10}	62.9	n/a	No
$PM_{2.5}$	6.8	n/a	No

The VCAPCD's 25 pounds per day thresholds for ROG and NO_X are not intended to be applied to construction emissions because such emissions are temporary. For construction impacts, the VCAPCD recommends minimizing fugitive dust through dust control measures. The project would be required to adhere to VCAPCD Rule 55, which restricts fugitive dust generated from disturbed soil

areas. Construction-related impacts are considered less than significant because of their temporary nature.

Operational Emissions

Operational emissions were also estimated using CalEEMod based on the proposed land uses. Maintenance of the trailhead parking area during operation would require vehicle trips for the following: regular trash removal; periodic opening/closing the access gate as needed during flood or fire events and other incidents involving public safety; and regular maintenance of the restroom facility (up to two truck trips per year to pump the vault toilet). Emissions associated with passenger vehicles traveling to the project site were not projected in CalEEMod, based on the reasonable assumption that in the absence of the proposed project, passenger vehicles would travel to other resources in the project area and would therefore not affect regional operational emission projections.

In CalEEMod, land uses for the project were assumed to be an unpaved parking lot for the trailhead parking area facility and a city park with an approximately 100 square foot building for the construction of the modular restroom. Development of the project would be required to comply with all applicable rules set forth by the VCAPCD. As shown in Table 3, operational emissions from the project are below the VCAPCD thresholds. Therefore, no long-term impact to regional air quality would occur.

Table 3 Operational Emissions (pounds/day)

Pollutant	Total Emissions	Significance Threshold	Significant Impact?
ROG	<0.1	25	No
NO_x	<0.1	25	No
CO	<0.1	n/a	No
SO_x	<0.1	n/a	No
PM_{10}	<0.1	n/a	No
$PM_{2.5}$	<0.1	n/a	No

Air pollution emissions associated with project construction and operation would not exceed VCAPCD thresholds. Therefore, impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

Sensitive receptors include population groups such as children, the elderly, and people with health problems, as well as land uses that are more likely to be used by these population groups such as health care facilities, retirement homes, school and playground facilities, and residential areas. The sensitive receptors nearest to the project include a residence approximately three miles south. As indicated above, neither temporary construction emissions nor long-term project operational emissions would exceed VCAPCD thresholds; therefore, the project would not subject sensitive receptors to significant pollutant concentrations. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

e. Would the project create objectionable odors affecting a substantial number of people?

Use of the proposed project would include visitation by passenger vehicles, and operation of the vault toilet facility; these factors could introduce odors to the site, but they would be intermittent. The vault toilet is a standard design used by the Forest Service and United. The building has a passive ventilation system that minimizes odors typical of a public vault toilet facility and would be regularly maintained which would avoid adverse odors. In addition, the project site is located approximately three miles north of the nearest sensitive receptor, and sensitive receptors would therefore not be affected by potentially objectionable odors from the vault toilet.

Odors would be generated by the operation of diesel-fueled equipment during the construction phase of the project and would include the smells of oil or diesel fuels. The odors would be limited to the time that construction equipment is operating and would not occur within proximity to a substantial number of people. In addition, all off-road construction equipment would be subject to the California Air Resources Board anti-idling rule (SS2449(d)(2)), which limits idling to five minutes. As a result, impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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4 Biological Resources

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project have any of the following impacts?				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service	☐	■	☐	☐
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service	☐	☐	■	☐
c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means	☐	☐	☐	■
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites	☐	☐	■	☐
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance	☐	☐	■	☐
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	■

A site reconnaissance for the proposed project was conducted on July 20, 2016, to evaluate biological resources within and adjacent to the project site and within the proposed access road, assess the habitat suitability for potential special-status species, map sensitive biological resources or communities (if present), determine presence/absence of waters or wetlands, document any wildlife connectivity features, and record observations of plant and wildlife species.

The project site has historically been used for cattle grazing and ranching, as apparent on historic photos and maps of the Lisk Ranch, provided by United. The Lisk Ranch, which originally existed on this site, was demolished and abandoned in the 1950s, and subsequent cattle leases (King Family) expired in 2001. However, the site was thoroughly disturbed during uses for ranching and grazing. In addition, United has been leasing the area to beekeepers since 2005. Remaining evidence of previous human activity, occupation, and disturbance is present in the form of disturbed ground and an empty, deteriorated cement-lined water pond (no longer operational, due to deterioration and siltation). During a site visit conducted for the proposed project, evidence of recent apiary activities within the project site was also observed (private party authorized apiary usage under a lease agreement with United). Based on a review of historical aerial photographs, as well as lease records from United, apiary activities have taken place within the project area since 2005. As described above and herein, the project site is historically and recently disturbed by human activities, which have also altered vegetation communities in the area. Existing general plant communities identified within the project site during site visits conducted for the proposed project include coastal sage scrub, southern oak woodland, annual grassland, chaparral, and ruderal.

Vegetation communities identified within the project site provide suitable habitat for numerous avian and bat species. Avian species observed/detected (i.e., visual/audio) within or near the project site include mourning dove (*Zenaida macroura*), Anna's hummingbird (*Calypte anna*), northern flicker (*Colaptes auratus*), downy woodpecker (*Picoides pubescens turati*), Nuttall's woodpecker (*Picoides nuttallii*), ash-throated flycatcher (*Myiarchus cinerascens*), California scrub-jay (*Aphelocoma californica*), oak titmouse (*Baeolophus inornatus*), bushtit (*Psaltriparus minimus*), wrentit (*Chamaea fasciata*), white-breasted nuthatch (*Sitta carolinensis*), blue-gray gnatcatcher (*Polioptila caerulea*), California towhee (*Melozone crissalis*), spotted towhee (*Pipilo maculatus*), blue grosbeak (*Passerina caerulea*), and lesser goldfinch (*Spinus psaltria*). One reptile species, western side-blotched lizard (*Uta stansburiana elegans*), and black bear (*Ursus americanus*) tracks were also identified within the project area.

The project is located in eastern Ventura County, approximately 11 miles northeast of the unincorporated town of Piru, California. The project is located on the northwest side of Lake Piru, approximately 600 feet west of Piru Canyon Road (Forest Service Road 4N13), and at the base of a small canyon that is oriented west to east. No aquatic or riparian vegetation exists on the project site; therefore, the lack of aquatic habitat eliminates the potential for the presence of special-status aquatic species to occur. No special-status habitats occur on the project site.

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

Rincon's search of the California Natural Diversity Database Biogeographic Information and Observation System (CNDDB BIOS) identified eleven (11) special status wildlife species, zero (0) special status plant species, and nine (9) communities as having been observed within a five-mile

radius of the project site (project area). Table 4 provides a list of CNDDB special-status species documented near the project site.

Special status species are those plants and animals that are:

- Listed, proposed for listing, or candidates for listing as Threatened or Endangered by the USFWS and National Marine Fisheries Service (NMFS) under the Federal Endangered Species Act (FESA)
- Listed or proposed for listing as Rare, Threatened, or Endangered by the CDFW under the California Endangered Species Act (CESA)
- Recognized as Species of Special Concern (SSC) by the CDFW
- Afforded protection under Migratory Bird Treaty Act (MBTA) and/or California Fish and Game Code (CFGC)
- Plants with a California Native Plant Society California Rare Plant Rank 1 or 2

Assessments for the potential occurrence of special-status species are based upon known ranges, habitat preferences for the species, species occurrence records from the CNDDB, species occurrence records from other sites near the survey area, and previous reports for the project site. The potential for each special-status species to occur in the survey area was evaluated according to the following criteria:

- **No Potential.** Habitat on and adjacent to the site is clearly unsuitable for the species requirements (foraging, breeding, cover, substrate, elevation, hydrology, plant community, site history, disturbance regime).
- **Low Potential.** Few of the habitat components meeting the species requirements are present, and/or the majority of habitat on and adjacent to the site is unsuitable or of very poor quality. The species is not likely to be found on the site.
- **Moderate Potential.** Some of the habitat components meeting the species requirements are present, and/or only some of the habitat on or adjacent to the site is unsuitable. The species has a moderate probability of being found on the site.
- **High Potential.** All of the habitat components meeting the species requirements are present and/or most of the habitat on or adjacent to the site is highly suitable. The species has a high probability of being found on the site.
- **Present.** Species observed on the site or has been recorded (e.g., CNDDB, other reports) on the site recently (within the last 5 years).

Table 4 Special-status Species Potentially Occurring within the Project Area

Scientific Name	Common Name	Federal Status	State Status	Ventura Co. Locally Important	Habitat Requirements	Potential for Occurrence
Fish						
Catostomus santaanae	Santa Ana sucker	FT	--	No	Endemic to Los Angeles Basin south coastal streams. Habitat generalists, but prefer sand-rubble-boulder bottoms, cool, clear water, and algae.	Low Potential (not likely to be found on site). Fresh water aquatic habitat is not present on the project site. Suitable habitat, however, may occur in adjacent aquatic resources, outside the project footprint.
Amphibians						
Anaxyrus californicus	arroyo toad	FE	SSC	No	Semi-arid regions near washes or intermittent streams, including valley-foothill and desert riparian, desert wash, etc. Rivers with sandy banks, willows, cottonwoods, and sycamores; loose, gravelly areas of streams in drier parts of range.	Low Potential. The project site occurs within mapped arroyo toad critical habitat; however, suitable habitat does not occur within the project site. Suitable habitat may occur in adjacent aquatic habitat located outside the project footprint.
Rana boylii	foothill yellow-legged frog	FE	SSC	No	Partly-shaded, shallow streams and riffles with a rocky substrate in a variety of habitats. Need at least some cobble-sized substrate for egg-laying.	Low Potential. Aquatic habitat is not present on the project site. Suitable habitat, however, may occur in adjacent aquatic resources, outside the project footprint.
Rana draytonii	California red-legged frog	FT	SSC	No	Lowlands and foothills in or near permanent sources of deep water with dense, shrubby or emergent riparian vegetation.	Low Potential. Critical habitat occurs within one mile of project site. No documented CNDDB occurrences within five miles of project site. The project site lacks suitable habitat; however, suitable habitat may occur in the adjacent aquatic resource areas located outside the project footprint.

Scientific Name	Common Name	Federal Status	State Status	Ventura Co. Locally Important	Habitat Requirements	Potential for Occurrence
Reptiles						
Actinemys pallida (formerly Emys marmorata)	Southern western pond turtle (formerly western pond turtle)	--	SSC	No	A thoroughly aquatic turtle of ponds, marshes, rivers, streams and irrigation ditches, usually with aquatic vegetation, below 6,000 feet elevation. Need basking sites and suitable (sandy banks or grassy open fields) upland habitat up to 0.5 km from water for egg-laying.	Low Potential. Aquatic habitat is not present on the project site; however, there is potential that suitable habitat occurs in the adjacent aquatic resource areas located outside the project footprint.
Phrynosoma blainvillii	Blainvillii (coast) horned lizard	--	SSC	No	Grasslands, coniferous forests, woodlands, and chaparral, with open areas and patches of loose soil. Roadsides, disturbed areas.	Moderate Potential. Species not documented within project site; however, the project site and associated roadway may provide suitable conditions for horned lizard occurrence.
Thamnophis hammondii	two-striped garter snake	--	SSC	No	Generally found around pools, creeks, cattle tanks, and other water sources, often in rocky areas, in oak woodland, chaparral, brushland, and coniferous forest.	Low Potential (not likely to be found on site). Aquatic habitat is not present on the project site; however, there is potential that two-striped garter snake may occur in the adjacent aquatic resource areas located outside the project footprint.
Birds						
Empidonax traillii extimus	Southwestern willow flycatcher	FE	SE, SSC	No	Nests in dense riparian forests interspersed with small openings for open water, or shorter/sparser vegetation, creating a mosaic that is not uniformly dense. Willow flycatcher breeding sites are almost always occur near slow-moving or still surface water and/or saturated soil.	Low Potential (not likely to be found on site). Critical habitat occurs within one-mile of project site. No documented CNDDB occurrences within five-miles of project site. The project site lacks suitable habitat; however, there is potential that suitable habitat may occur in the designated critical habitat area in the adjacent aquatic resource areas, located outside the project footprint.

Scientific Name	Common Name	Federal Status	State Status	Ventura Co. Locally Important	Habitat Requirements	Potential for Occurrence
Gymnogyps californianus	California condor	FE	SE, FP	No	Require vast expanses of open savannah, grasslands, and foothill chaparral in mountain ranges of moderate altitude. Deep canyons containing clefts in the rocky walls provide nesting sites. Forages up to 100 miles from roost/nest.	Low Potential (not likely to be found on site). The southern boundary of the project site falls approximately four miles west/north west from the Sespe Condor Sanctuary in the Los Padres National Forest and the Hopper Mountain National Wildlife Refuge. The project site lacks suitable nesting habitat and the likelihood for a California condor to land on the project site is very low, but there is a potential for a foraging condor could be found within the general area.
Falco mexicanus	prairie falcon	--	WL	No	Inhabits dry, open terrain, either level or hilly. Breeding sites located on cliffs. Forages far afield, even to marshlands and ocean shores.	Low Potential. Grassland within the project site provides suitable foraging habitat but lacks nesting habitat.
Mammals						
Eumops perotis californicus	western mastiff bat	--	SSC	No	Many open, semi-arid to arid habitats, including conifer and deciduous woodlands, coastal scrub, grasslands, chaparral, etc. Roosts in crevices in cliff faces, high buildings, trees and tunnels.	Moderate Potential. Suitable foraging habitat occurs within the project site and the adjacent areas. Suitable roosting habitat occurs within the chaparral, coastal sage scrub, and oak woodland habitat located adjacent to the project site. No potential roosts were identified during the reconnaissance site visit.

Status Definitions: FE = Federally Endangered, FT = Federally Threatened, SE = State Endangered, FP = CDFW Fully Protected, SSC = CDFW Species of Special Concern

Special-Status Plant Species

The CNDDB does not list any special status plant species occurrences within five (5) miles of the project site. However, a southern California walnut (*Juglans californica*) tree, California Rare Plant Rank 4.2, was observed within the north section of the project site during the site survey, but outside of the planned ground disturbance area (approximately 150 feet away from proposed ground disturbance). This species is not considered a California Rare Plant Rank 1 or 2. No sensitive plants were observed during the reconnaissance survey, and due to previous human disturbance observed no special status plant species are expected to occur within the project area. Table 5

provides a list of plant species observed within the project area during the reconnaissance field survey.

Table 5 Plant Species Observed within and Adjacent to the Project Area

Family	Scientific Name	Common Name	Origin
Amaranthaceae	*Amaranthus albus*	Tumbleweed	Non-native
Anacardiaceae	*Rhus aromatica*	Fragrant sumac	Native
Anacardiaceae	*Toxicodendron diversilobum*	Poison oak	Native
Apiaceae	*Lomatium dasycarpum ssp. dasycarpum*	Woolly fruited lomatium	Native
Apocynaceae	*Asclepias fascicularis*	Narrow leaf milkweed	Native
Asteraceae	*Baccharis salicifolia*	Mule fat	Native
Asteraceae	*Carduus pycnocephalus*	Italian thistle	Non-native
Asteraceae	*Centaurea solstitialis*	Yellow star thistle	Non-native
Asteraceae	*Chondrilla juncea*	Skeleton weed	Non-native
Asteraceae	*Heterotheca villosa*	Hairy goldenaster	Native
Asteraceae	*Lactuca serriola*	Prickly lettuce	Non-native
Asteraceae	*Silybum marianum*	Milk thistle	Non-native
Boraginaceae	*Cryptantha microstachys*	Tejon cryptantha	Native
Boraginaceae	*Eriodictyon crassifolium var. nigrescens*	Thick leaved yerba santa	Native
Boraginaceae	*Plagiobothrys nothofulvus*	Rusty haired popcorn flower	Native
Brassicaceae	*Brassica nigra*	Black mustard	Non-native
Brassicaceae	*Stanleya pinnata*	Prince's plume	Native
Caprifoliaceae	*Sambucus nigra ssp. caerulea*	Blue elderberry	Native
Euphorbiaceae	*Croton setiger*	Turkey mullein	Native
Fabaceae	*Acmispon heermannii*	Heermann's lotus	Native
Fabaceae	*Lupinus albifrons var. albifrons*	Silver bush lupine	Native
Fabaceae	*Spartium junceum*	Spanish broom	Non-native
Fabaceae	*Trifolium microcephalum*	Small head clover	Native
Fagaceae	*Quercus agrifolia*	Coast live oak	Native
Geraniaceae	*Erodium cicutarium*	Red stemmed filaree	Non-native
Juglandaceae	*Juglans californica*	Southern California walnut	Native, 4.2
Lamiaceae	*Marrubium vulgare*	White horehound	Non-native
Lamiaceae	*Salvia apiana*	White sage	Native
Liliaceae	*Brodiaea sp.*	Brodiaea	Native
Malvaceae	*Malacothamnus fasciculatus*	Bush mallow	Native
Onagraceae	*Clarkia unguiculata*	Elegant clarkia	Native
Phrymaceae	*Mimulus aurantiacus*	Sticky monkeyflower	Native
Poaceae	*Avena fatua*	Large oats	Non-native
Poaceae	*Bromus arizonicus*	Arizona brome	Native
Poaceae	*Bromus diandrus*	Ripgut brome	Non-native
Poaceae	*Cynodon dactylon*	Bermudagrass	Non-native
Poaceae	*Elymus caput-medusae*	Medusa head	Non-native
Polygonaceae	*Eriogonum baileyi var. baileyi*	Bailey's buckwheat	Native
Polygonaceae	*Eriogonum fasciculatum var. fasciculatum*	California buckwheat	Native
Rhamnaceae	*Frangula californica ssp. cuspidata*	Sierra hoary coffeeberry	Native
Rhamnaceae	*Rhamnus ilicifolia*	Hollyleaf redberry	Native
Rosaceae	*Adenostoma fasciculatum var. fasciculatum*	Chamise	Native
Solanaceae	*Datura wrightii*	Jimsonweed	Native
Solanaceae	*Nicotiana glauca*	Tree tobacco	Non-native
Zygophyllaceae	*Tribulus terrestris*	Puncture vine	Non-native

Special-Status Wildlife Species

No special-status wildlife species were observed onsite during the reconnaissance survey; however, a CNDDB search for special status wildlife occurrences within a five-mile radius of the project site identified eleven (11) special-status species (see Table 4). Based on existing habitat within the project area, including the adjacent aquatic resources areas that do not occur within the project footprint, eleven (11) species have a moderate or low potential to occur within the project area. Project activities would not impact the adjacent aquatic resources and no creek crossings would occur leading to the proposed trailhead parking area facility. Opening access to the public on to Piru Canyon Road, which leads to Blue Point Campground, may present potential impacts to aquatic resources that may occur along the adjacent Lisk Creek, which the road crosses after the proposed trailhead parking area facility.

The gate at Reasoner Canyon and the gate at the Juan Fernandez Launch Ramp Facility (see Figure 4) are being removed (or locked open in place) by United as part of the proposed project. The project includes replacing the Juan Fernandez Launch Ramp Facility access gate with a new gate located beyond the proposed trailhead parking area facility near the Lisk Creek crossing of Piru Canyon Road, to continue limiting public vehicular access into areas of sensitive frog/toad habitat. Potential impacts to special-status wildlife species will be less than significant, because implementation of the proposed trailhead parking area facility will not increase public vehicular access beyond the proposed parking area or the relocated gate beyond current conditions.

Further discussion regarding the potential impacts to the species addressed in this analysis is provided below, including appropriate avoidance and minimization measures and mitigation measures that will be implemented during project activities.

- **Santa Ana Sucker.** The CNDDB documents Santa Ana sucker approximately 1.2 miles upstream of project site, within Piru Creek. Identifications have not been documented adjacent to the project site and project activities will not impact the adjacent Piru Creek or Lisk Creek that may provide suitable habitat for the species. The project is not expected to impact Santa Ana sucker; however, BMPs will be implemented, such as an erosion control and sediment plan, to avoid or minimize potential impacts to the adjacent aquatic resources. The project will have less than significant impact to Santa Ana sucker or potentially suitable habitat for Santa Ana sucker.
- **Arroyo Toad (ARTO).** The project site is located within mapped ARTO critical habitat (50 Code of Federal regulations [CFR] Part 17; Federal Register Vol. 66, No. 26, pages 9414-9474, February 7, 2001). The project site lacks suitable aquatic habitat; however, the adjacent Piru Creek and Lisk Creek may provide suitable aquatic habitat for ARTO. Although the majority of the project site is composed of ruderal habitat, a small portion of the project site as well as adjacent areas is composed of suitable upland habitat for ARTO (e.g., coastal sage scrub, grassland, oak woodland). There are no recorded observances of ARTO within five (5) miles of the project site and no ARTO were observed during field surveys; however, due to the presence of potentially suitable habitat in the adjacent creek channels, and designation of critical habitat in the project area, the ARTO has a low potential to occur within the project area. Potential impacts to ARTO may occur when toads are most active during their breeding season (March to July) and during night time hours and may move across upland habitats, near roads, where toads have a greater likelihood to be crushed by vehicles. These impacts have greatest potential to occur along the road crossing at Lisk Creek, located past the proposed trailhead parking area facility and the existing trailhead on Piru Canyon Road. The placement of an access gate past the proposed trailhead parking area facility near the Lisk Creek crossing (as discussed in the project description) will limit public vehicle access when toads have the greatest likelihood to occur

along the roadway. In addition, construction BMPs to control erosion and sedimentation into the adjacent waterways would be implemented, and Mitigation Measure BIO-1 would be implemented, requiring pre-construction surveys for sensitive wildlife. Therefore, the potential for project impacts to ARTO would be less than significant.

- **Foothill Yellow-Legged Frog (FYLF).** The project site occurs within one mile of CNDDB documented occurrences for FYLF, within the adjacent Piru Creek. The project site lacks suitable aquatic habitat; however, the adjacent Piru Creek and Lisk Creek may provide suitable aquatic habitat for FYLF. Due to the presence of potentially suitable habitat in the adjacent creek channels, FYLF has a low potential to occur within the project area. Potential impacts to FYLF may occur when frogs are most active during their breeding season (April to early July) and during night time hours. These impacts have greatest potential to occur along the road crossing at Lisk Creek, located past the proposed trailhead parking area facility. The placement of an access gate past the proposed trailhead parking area facility near the Lisk Creek crossing (as discussed in the project description) will limit public vehicle access when frogs have the greatest likelihood to occur along the roadway. In addition, construction BMPs to control erosion and sedimentation into the adjacent waterways would be implemented, and Mitigation Measure BIO-1 would be implemented, requiring pre-construction surveys for sensitive wildlife. Therefore, the potential for project impacts to FYLF would be less than significant.
- **California Red-Legged Frog (CRLF).** The project site is located within one mile of mapped CRLF critical habitat (VEN-2) (50 CFR Part 17; Federal Register Vol. 75, No. 51, pages 12816-12959, March 17, 2010). The project site lacks suitable aquatic habitat; however, the adjacent Piru Creek and Lisk Creek may provide suitable aquatic habitat for CRLF. Although the majority of the project is composed of ruderal habitat, a small portion of the project site as well as adjacent areas is composed of suitable upland habitat for CRLF. There are no recorded observances of CRLF within five (5) miles of the project site; however, due to the presence of potentially suitable habitat in the adjacent creek channels, and designation of critical habitat in the project area, CRLF has a low potential to occur within the project area. Potential impacts to CRLF may occur when frogs are most active during their breeding season (late November to April) and during night time hours. These impacts have greatest potential to occur along the road crossing at Lisk Creek, located past the proposed trailhead parking area facility. The placement of an access gate past the proposed trailhead parking area facility near the Lisk Creek crossing (as discussed in the project description) will limit public vehicle access when frogs have the greatest likelihood to occur along the roadway. In addition, construction BMPs to control erosion and sedimentation into the adjacent waterways would be implemented, and Mitigation Measure BIO-1 would be implemented, requiring pre-construction surveys for sensitive wildlife. Therefore, the potential for project impacts to CRLF would be less than significant.
- **Southern Western Pond Turtle.** The project site occurs within one mile of CNDDB documented occurrences for pond turtle, within the adjacent Piru Creek. Suitable habitat may occur within the adjacent aquatic resources; however, these resources will not be impacted by project activities. Suitable upland nesting habitat may also be present in the undisturbed areas surrounding the project site. Potential impacts to pond turtle may occur when turtles are active in upland habitats for nesting, near roads, where turtles have a greater likelihood to be crushed by vehicles. These impacts have greatest potential to occur along the road crossing at Lisk Creek, located past the proposed trailhead parking area facility. The placement of an access gate past the proposed trailhead parking area facility near the Lisk Creek crossing (as discussed in the project description) will limit public vehicle access when turtles have the greatest likelihood to occur along the roadway. Mitigation Measure BIO-1 would be implemented and will identify

potentially occurring pond turtles located in the upland habitats; additionally, a biological monitor will ensure construction activities do not impact turtle activities, thus reducing potential impacts to pond turtle to less than significant.

- **Blainvillii Horned Lizard.** Suitable habitat for horned lizard may occur within the ruderal areas and roadways within the project site; however, no horned lizards were observed during reconnaissance-level biological surveys onsite. As required by Mitigation Measure BIO-1, pre-construction surveys completed prior to initial ground clearing activities will identify any potentially occurring horned lizards located in the upland habitats and relocate them out of harm's way, thus reducing potential impacts to horned lizard to less than significant.
- **Two-Striped Garter Snake.** The project site occurs within one mile of CNDDB documented occurrences for two-striped garter snake, within the adjacent Piru Creek. Suitable habitat may occur within the adjacent aquatic resources; however, these resources will not be impacted by project activities. Vehicles crossing Lisk Creek, past the proposed trailhead parking area facility, may impact two-striped garter snake by crushing. The placement of an access gate past the proposed trailhead parking area facility near the Lisk Creek crossing (as discussed in the project description) will limit public vehicle access when snakes have the greatest likelihood to occur along the roadway. Mitigation Measure BIO-1b would be implemented, requiring pre-construction surveys for sensitive wildlife. With implementation of this measure, pre-construction surveys would be completed prior to initial ground clearing activities, and identification will be made of potentially occurring two-striped garter snake located in the upland habitats. A biological monitor will ensure implementation of this mitigation measure so that construction activities do not impact two-striped garter snake activities, thus reducing potential impacts to two-striped garter snake to less than significant.
- **Southwestern Willow Flycatcher.** The project site is located adjacent to mapped southwestern willow flycatcher critical habitat, within the Santa Clara Management Unit, which includes Piru Creek (50 CFR Part 17; Federal Register Vol. 786, No. 2, pages 344-534, January 3, 2013). No recorded observances of southwestern willow flycatcher have been documented within five (5) miles of the project site. The project site lacks suitable riparian and aquatic habitat; however, the adjacent Piru Creek and Lisk Creek may provide suitable riparian habitat for southwestern willow flycatcher. Due to the presence of critical habitat and potentially suitable habitat in the adjacent creek channels, the southwestern willow flycatcher has a low potential to occur within the project area; however, no suitable habitat occurs within the project footprint. Potential indirect impacts to southwestern willow flycatcher may occur during construction activities, if construction activities take place during breeding season when the birds have potential to occur in the area. With the implementation of Mitigation Measure BIO-1, a nesting bird survey will be conducted within 500 feet from the project site if activities are conducted during the nesting bird season. Identification of nests will prompt construction activities to be mitigated or avoided until birds have fledged, as appropriate. No riparian habitat will be removed as part of project activities and project activities will be temporary. Therefore, with the implementation of these measures, potential impacts to southwestern willow flycatcher will be less than significant.
- **California Condor.** The Sespe-Piru critical habitat unit includes the Sespe Condor Sanctuary in the Los Padres National Forest and the Hopper Mountain National Wildlife Refuge, the southern boundary of which is approximately four miles west-northwest of the project site. The project site lacks suitable nesting habitat (e.g., cave on cliff or rock crevice), but there is the potential that a foraging condor could be found within the general area. The likelihood of a California condor to land on the project site is very low, given the lack of suitable habitat needed for a bird of this size to take flight and a lack of foraging material (i.e. carrion). Therefore, the California

condor has a low potential to occur within the project site and with the implementation of Mitigation Measure BIO-1, potential impacts to California condor will be less than significant.

- **Prairie Falcon.** Preferred nesting habitats of prairie falcon (e.g., natural crevice, ledge on a cliff, or steep bluff) were not observed within the project area. The main food source for the prairie falcon is ground squirrel and avian species; however, ground squirrel, ground squirrel burrows, and other mammal burrows were not observed within the project site. Grassland habitat present within the project site may provide foraging habitat due to the presence of various avian species. Therefore, there is a low potential for the prairie falcon to occur foraging onsite. The proposed project would not cause an adverse impact to foraging prairie falcon due to the large amount of additional foraging space available within two miles of the project site, and large areas of open space that occur to the east, west, north, and south would likely support prairie falcon in the area. Additionally, implementation of Mitigation Measure BIO-1, which requires preconstruction nesting bird surveys, would reduce potential indirect impacts to less than significant.
- **Western Mastiff Bat.** Suitable roosting habitat occurs within the chaparral, coastal sage scrub, and oak woodland habitat located adjacent to the project area. No potential roosts were identified within the project area, but the project area and adjacent areas provide suitable foraging habitat for this species. Therefore, this species has a moderate potential to occur foraging within the project area, and the project has a potential to indirectly impact individuals, if present. Implementation of Mitigation Measure BIO-1, which requires pre-construction surveys for bats, would reduce the potential for indirect impacts to the western mastiff bat to less than significant.

Foraging Raptors

The project site has the potential to support foraging raptors. Small mammals and lizards that likely occur on site provide potential prey for raptors, such as the red-tailed hawk (*Buteo jamaicensis*) and Cooper's hawk (*Accipiter cooperii*). However, the proposed project would not cause an adverse impact to foraging raptors due to the large amount of additional foraging space available within the areas surrounding the project site. Large areas of open space also occur to the north, east, south, and west that would support foraging raptors in the area. Therefore, potential project impacts to foraging raptors would be less than significant and no mitigation is required.

Nesting Birds

The project site has a high potential to support nesting birds, particularly passerines, due to the vegetation communities present onsite (e.g., coastal sage scrub, southern oak woodland, annual grassland, and chaparral).

Nesting birds are protected by the Migratory Bird Treaty Act (MBTA) and the California Fish and Game Code (CFGC) 3503. The MBTA makes it unlawful to "take" (damage, destroy, remove, either intentionally or unintentionally) birds, nests, egg or young in the nest of any species under the act's protection. The take provision also includes any disturbance that causes a nest to fail and/or the loss of reproductive effort. The loss of reproductive effort, or a take under the MBTA or CFGC would be considered a significant impact without mitigation.

Mitigation Measure

The following mitigation measure, in compliance with MBTA and CFGC requirements, would be required to reduce impacts to nesting birds and special-status species to a less than significant level.

BIO-1 **Special-Status Wildlife and Nesting Bird Preconstruction Clearance Surveys.** No more than one week prior to vegetation clearing and construction within the project site, a qualified biologist shall conduct a pre-construction survey for special-status wildlife species and nesting birds. Any potential bat roosting areas shall be inspected and if roosting bats are present, the roosts will be avoided. In addition, during any construction activities involving vegetation clearing, or initial modification of natural habitat, United Water Conservation District shall contract with a biological monitor. The biological monitor shall have the authority to stop any project activities to relocate an animal outside of project limits to a pre-designated relocation area with suitable habitat conditions essential for the animal's survival. The biological monitor qualifications shall include experience handling a variety of wildlife, and permitted with the appropriate regulatory agencies, as necessary. The monitor shall document all wildlife observed during project activities, all wildlife relocated out of the project impact area, and pre-designated relocation areas.

In the event initial vegetation clearing and grading must occur during the avian nesting season (February 1 – August 31), a nesting bird survey shall be conducted concurrent with the pre-construction wildlife survey. The nesting bird survey will cover the development footprint and 500 feet from the development footprint, as practicable. If occupied (i.e., active) nests are found, land clearing activities within a setback area surrounding the nest shall be postponed or halted; the setback area shall be determined by qualified biologist. The standard setback is 300 feet for most birds and 500 feet for raptors, as recommended by the California Department of Fish and Wildlife (CDFW). This setback can be increased or decreased based on the recommendation of the qualified biologist, with provisions such as equipment restriction, disturbance duration, and nest monitoring.

Land clearing activities may commence within the setback area when the nest is no longer active (i.e., juveniles have fledged), as determined by the qualified biologist. Land clearing activities may also occur outside of the setback areas, but encroachment into the buffer shall only occur at the discretion of the qualified biologist.

Significance After Mitigation

With the implementation of the mitigation measure listed above, impacts of the proposed project to special-status species would be less than significant.

POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED

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

Although scattered coast live oaks (*Quercus agrifolia*) are located within the project's ruderal habitat, the oak trees will not be directly impacted from project activities (i.e., oaks will not be removed). Additionally, southern oak woodland occurs adjacent to the project site, but will not be impacted by construction activities. The CNDDB search identified nine (9) sensitive habitats within five (5) miles of the project site including: Canyon Live Oak Ravine Forest, Southern Sycamore Alder Riparian Woodland, Southern Cottonwood Willow Riparian Forest, Southern Coast Live Oak Riparian Forest, Walnut Forest, California Walnut Woodland, Southern Mixed Riparian Forest, Southern Willow Scrub, and Coastal and Valley Freshwater Marsh. No sensitive plant communities occur

within the project site or directly adjacent to the project site. Additionally, there is a low potential for additional sensitive plants or habitats to be located on site due to the previous human activity disturbance. Based on the lack of sensitive communities on and adjacent to the project site, potential impacts would be less than significant and no mitigation is required.

LESS THAN SIGNIFICANT IMPACT

c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No federally protected wetlands occur on the project site, and no direct impacts are anticipated. No indirect impacts to offsite downstream waters and wetlands would occur with adherence to existing stormwater regulations.

NO IMPACT

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

Use of the project site by migrating wildlife is minimal because the site consists of previously disturbed land and does not provide undisturbed contiguous habitat. Local wildlife movement corridors were not observed onsite, but wildlife may utilize adjacent riparian area(s) along Lisk Creek. Therefore, local wildlife movement is not expected to be directly affected by the proposed project.

The proposed project would use existing roads and previously disturbed areas, and would not increase road density, add to fragmentation of habitats, or introduce new barriers to movement within the project site. The project would limit night lighting, and significant noise emission would be confined to the construction period. In addition, there is abundant, contiguous, undisturbed habitat to the north along the Lisk Creek corridor and to the northeast along the Piru creek corridor, which provides more suitable features/conditions such as vegetative cover and access to water. Additionally, the project is located over 500 feet from Piru Creek so construction and operation (e.g., noise, dust) would not indirectly affect wildlife movement through Piru Creek; therefore, direct and indirect impacts on local wildlife movement and regional connectivity will be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

There are numerous trees on the project site; therefore, the proposed project would fall within the Ventura County Tree Protection Ordinance and Tree Protection Guidelines; the proposed project would be implemented in compliance with the Ventura County Tree Protection Ordinance and Tree Protection Guidelines. No oak or heritage trees are proposed for removal; therefore, impacts to oak trees will be less than significant. The biological resources policies contained with the Ventura County General Plan including Piru Area Plan Goal 1.5.1.2, which requires protection of the Piru Creek wildlife corridor (discussed above), would apply to the project. There are no other local policies or ordinances that apply to the project site. Potential impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

The project site does not occur in any adopted Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP), or other approved local, regional, or state habitat conservation plan. Therefore, the project would not conflict with the provisions of an adopted HCP, NCCP, or other approved local, regional, or state conservation plan. No impact would occur.

NO IMPACT

5 Cultural Resources

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project have any of the following impacts?				
a. Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5	☐	☐	☐	■
b. Cause a substantial adverse change in the significance of an archaeological resource as defined in §15064.5	☐	■	☐	☐
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	■	☐	☐
d. Disturb any human remains, including those interred outside of formal cemeteries	☐	■	☐	☐

This section analyzes potential impacts to archaeological, historical, and paleontological resources. The cultural resources study included a records search with the South Central Coastal Information Center (SCCIC), Native American scoping, a field survey and evaluation of the site. The paleontological analysis included a desk-top review of geologic maps and primary literature. The project site is located on currently vacant, previously developed land. The project is located on a thin veneer of Quaternary (Holocene-age) alluvium overlying the Miocene-age Monterey Shale, which is known to contain scientifically significant paleontological resources.

The project area lies on the west shore of Lake Piru, within the Transverse Ranges geomorphic province, in the southern reaches of the Topatopa Mountains, just north of the Santa Clara River valley. The Transverse Ranges are an east-west trending series of steep, fault-bounded, mountain ranges and valleys extending from the Channel Islands in the west to the San Bernardino Mountains in the east. The Transverse Ranges are tectonically active and complex, comprising Proterozoic (more than 1.5 billion years old) batholiths (i.e., igneous intrusive bodies) and metamorphic rocks (i.e., rocks altered by heat and pressure) to Cenozoic (less than 66 million years old) marine and terrestrial sediments, some of which contain abundant fossils (e.g., the Crowder Formation) (Meisling and Weldon 1989; Silver 1971). The Transverse Ranges are rapidly rising due to intense north-south compression forces controlled by the San Andreas Fault Zone. Hydrocarbon-rich sedimentary rocks, for example the Monterey Shale, originally deposited in marine settings, are being thrust up and folded, exposing large areas for oil-production (California Geological Survey 2002).

The project site is located within an area historically occupied by the Tataviam. The Tataviam territories included the upper reaches of the Santa Clara River drainage east of Piru Creek, but also encompassed the Sawmill Mountains to the north and the southwestern portion of the Antelope Valley. Groups neighboring Tataviam territory included the Chumash to the north and west, the Serrano to the east, and the Gabrielino (Tongva) to the south. Based on the results of the

archaeological records search, there is no evidence that any of the known Tataviam places are located within or adjacent to the project site.

Prehistory

During the twentieth century, many archaeologists developed chronological sequences to explain prehistoric cultural changes within all or portions of southern California (c.f., Jones and Klar 2007; Moratto 1984). Wallace (1955, 1978) devised a prehistoric chronology for the southern California coastal region that included four horizons: Early Man, Milling Stone, Intermediate, and Late Prehistoric. Wallace's chronology was based on early studies and lacked the chronological precision of absolute dates (Moratto 1984:159). Since then, Wallace's (1955) synthesis has been modified and improved using thousands of radiocarbon dates obtained by southern California researchers over recent decades (Byrd and Raab 2007:217; Koerper and Drover 1983; Koerper et al. 2002; Mason and Peterson 1994). The prehistoric chronological sequence for southern California presented below is a composite based on Wallace (1955) and Warren (1968) as well as later studies, including Koerper and Drover (1983).

Early Man Horizon (ca. 10,000 – 6000 B.C.)

Numerous pre-8000 B.C. sites have been identified along the mainland coast and Channel Islands of southern California (c.f., Erlandson 1991; Johnson et al. 2002; Jones and Klar 2007; Moratto 1984; Rick et al. 2001:609). One of them, the Arlington Springs site on Santa Rosa Island, produced human femurs dating to approximately 13,000 years ago (Arnold et al. 2004; Johnson et al. 2002). On nearby San Miguel Island, human occupation at Daisy Cave (SMI-261) has been dated to nearly 13,000 years ago. This site also included some of the earliest examples of basketry on the Pacific Coast, dating to over 12,000 years old (Arnold et al. 2004).

Although few Clovis or Folsom style fluted points have been found in southern California (e.g., Dillon 2002; Erlandson et al. 1987), Early Man Horizon sites are generally associated with a greater emphasis on hunting than later horizons. Recent data indicate that the Early Man economy was a diverse mixture of hunting and gathering, including a significant focus on aquatic resources in coastal areas (e.g., Johnson et al. 2002) and on inland Pleistocene lakeshores (Moratto 1984). A warm and dry 3,000-year period called the Altithermal began around 6000 B.C. The conditions of the Altithermal are likely responsible for the change in human subsistence patterns at this time, including a greater emphasis on plant foods and small game.

Milling Stone Horizon (6000 – 3000 B.C.)

Wallace (1955:219) defined the Milling Stone Horizon as "marked by extensive use of milling stones and mullers, a general lack of well[-]made projectile points, and burials with rock cairns." The dominance of such artifact types indicates a subsistence strategy oriented around collecting plant foods and small animals. A broad spectrum of food resources was consumed including small and large terrestrial mammals, sea mammals, birds, shellfish and other littoral and estuarine species, near-shore fishes, yucca, agave, and seeds and other plant products (Kowta 1969; Reinman 1964). Variability in artifact collections over time and from the coast to inland sites indicates that Milling Stone Horizon subsistence strategies adapted to environmental conditions (Byrd and Raab 2007:220). The Topanga Canyon site in the Santa Monica Mountains is considered one of the definitive Milling Stone Horizon sites in southern California.

Lithic artifacts associated with Milling Stone Horizon sites are dominated by locally available tool stone and in addition to ground stone tools such as manos and metates, chopping, scraping, and

cutting tools are very common. Kowta (1969) attributes the presence of numerous scraper-plane tools in Milling Stone Horizon collections to the processing of agave or yucca for food or fiber. The mortar and pestle, associated with acorns or other foods processed through pounding, were first used during the Milling Stone Horizon and increased dramatically in later periods (Wallace 1955, 1978; Warren 1968).

Intermediate Horizon (3000 B.C. – A.D. 500)

Wallace's Intermediate Horizon dates from approximately 3000 B.C.-A.D. 500 and is characterized by a shift toward a hunting and maritime subsistence strategy, as well as greater use of plant foods. During the Intermediate Horizon, a noticeable trend occurred toward greater adaptation to local resources including a broad variety of fish, land mammal, and sea mammal remains along the coast. Tool kits for hunting, fishing, and processing food and materials reflect this increased diversity, with flake scrapers, drills, various projectile points, and shell fishhooks being manufactured.

Mortars and pestles became more common during this transitional period, gradually replacing manos and metates as the dominant milling equipment. Many archaeologists believe this change in milling stones signals a change from the processing and consuming of hard seed resources to the increasing reliance on acorn (e.g., Glassow et al. 1988; True 1993). Mortuary practices during the Intermediate typically included fully flexed burials oriented toward the north or west (Warren 1968:2-3).

Late Prehistoric Horizon (A.D. 500 – Historic Contact)

During Wallace's (1955, 1978) Late Prehistoric Horizon the diversity of plant food resources and land and sea mammal hunting increased even further than during the Intermediate Horizon. More classes of artifacts were observed during this period and high quality exotic lithic materials were used for small finely worked projectile points associated with the bow and arrow. Steatite bowls were carved from stone and made for cooking and storage. An increased use of asphalt for waterproofing is noted within this period. More artistic artifacts were recovered from Late Prehistoric sites and cremation became a common mortuary custom. Larger, more permanent villages supported an increased population size and social structure (Wallace 1955:223).

Ethnographic Background

The project area was historically occupied by the Tataviam, about whom very little is recorded (King and Blackburn 1978). Kroeber (1925) described the area as occupied by the Alliklik. Researchers today generally agree that the terms Tataviam and Alliklik describe the same group and that they spoke a Uto-Aztecan language, most likely a Takic language (Hudson 1982). Tataviam territory included the upper Santa Clara River from Piru Creek eastward, extending over the Sawmill Mountains to the southwest edge of the Antelope Valley (King and Blackburn 1978). Their territory was bounded on the west and north by various Chumash groups; on the south by the Tongva (Gabrielino and Fernandeño, though some Tataviam were also identified as Fernandeño because of their association with Mission San Fernando); and to the east by the Kitanemuk.

Exogamous marriage was common, with Tataviam intermarrying with Tongva, Chumash, and Kitanemuk neighbors (King and Blackburn 1978). The word "Piru," is derived from a Kitanamuk name for the Tataviam village present on Piru Creek, though the Tataviam pronunciation was similar. King and Blackburn (1978) hypothesize that the Tataviam relied on yucca as a food source more than their neighbors because of the predominance of large south-facing slopes within their territory. Additional food resources included acorns, sage seeds, berries, small mammals, and deer.

Settlement size ranged from 10 to 200 persons, with small settlements often ancillary to large villages. Archaeological evidence from Bower's Cave – located between Newhall and Piru – combined with ethnographic evidence suggest their ritual organization was similar to both the Chumash and Gabrielino, whose lifestyles were distinct from one another.

By 1810 the Tataviam were virtually completely "missionized," through baptism at Mission San Fernando. Juan Fustero, self-titled "the last of the Piru Indians" and one of the most well-known historical figures in the area, was possibly the last full-blooded Tataviam man. Born on the Temescal Ranch in 1841, he was the last great-grandson of the last chief of the Piru Tribe (Fillmore Gazette 2008). Although he referred to himself as the last of the Tataviam, some reports indicate that his wife was also full-blooded Tataviam, and thus their children would be as well (SCV History n.d.). In 1885 the U.S. government granted him a patent for a homestead in Piru Canyon where he subsequently settled with his family. There he farmed, ranched, made bridles and lariats, and procured small amounts of gold from a mysterious source. He died in 1921, and a memorial monument for Fustero was placed along the shores of Lake Piru in 1956, close to where he spent most of his life (Carey 2012).

History

Post-European contact history for the state of California is generally divided into three periods: the Spanish Period (1769–1822), the Mexican Period (1822–1848), and the American Period (1848–present).

Spanish Period (1769-1822)

Spanish exploration of California began when Juan Rodriguez Cabrillo led the first European expedition into the region in 1542. For more than 200 years after his initial expedition, Spanish, Portuguese, British, and Russian explorers sailed the California coast and made limited inland expeditions, but they did not establish permanent settlements (Bean 1968; Rolle 2003). In 1769, Gaspar de Portolá and Franciscan Father Junipero Serra established the first Spanish settlement in what was then known as Alta (upper) California at Mission San Diego de Alcalá. This was the first of 21 missions erected by the Spanish between 1769 and 1823. Mission San Buenaventura was founded in 1782. It was during this time that initial Spanish settlement in the vicinity of the project site began.

Mexican Period (1822-1848)

The Mexican Period commenced when news of the success of the Mexican Revolution (1810-1821) against the Spanish crown reached California in 1822. This period saw the privatization of mission lands in California with the passage of the Secularization Act of 1833. This Act enabled Mexican governors in California to distribute mission lands to individuals in the form of land grants. Successive Mexican governors made more than 700 land grants between 1822 and 1846, putting most of the state's lands into private ownership for the first time (Shumway 2007). About 20 land grants (ranchos) were located in Ventura County.

The Mexican Period for Ventura County and adjacent areas ended in early January 1847. Mexican forces fought combined US Army and Navy forces in the Battle of the San Gabriel River on January 8 and in the Battle of La Mesa on January 9 (Nevin 1978). American victory in both of these battles confirmed the capture of Los Angeles by American forces (Rolle 2003). On January 10, leaders of the Pueblo of Los Angeles surrendered peacefully after Mexican General Jose Maria Flores withdrew his forces. Shortly thereafter, newly appointed Mexican Military Commander of California Andrés Pico

surrendered all of Alta California to US Army Lieutenant Colonel John C. Fremont in the Treaty of Cahuenga (Nevin 1978).

American Period (1848- Present)

The American Period officially began with the signing of the Treaty of Guadalupe Hidalgo in 1848, in which the United States agreed to pay Mexico $15 million for the conquered territory, which included California, Nevada, Utah, and parts of Colorado, Arizona, New Mexico, and Wyoming. Settlement of southern California continued to increase during the early American Period. Many ranchos in the county were sold or otherwise acquired by Americans, and most were subdivided into agricultural parcels or towns.

The discovery of gold in northern California in 1848 led to the California Gold Rush (Guinn 1977; Workman 1935:26). The presence of commercial grade oil in what later became Ventura County was discovered in 1852 at Rancho Ojai (Franks and Lambert 1985). By 1853, the population of California exceeded 300,000. Ventura County was officially divided from Santa Barbara County on January 1, 1873. Thousands of settlers and immigrants continued to move into the state, particularly after the completion of the transcontinental railroad in 1869 and the real estate boom of the 1880s (Dumke 1944).

The construction of the Saugus to Santa Barbara Branch (or Santa Paula Branch) of the Southern Pacific Railroad in the 1880s encouraged travel through and settlement of the Santa Clara River Valley, as well as a large distribution network for its citrus and other products (Sperry 2006). The first version of the Southern Pacific's Coast Line, between Los Angeles and Santa Barbara, was completed in 1900 through the Santa Clara Valley. A later version through Santa Susanna and bypassing the Saugus Branch was completed in 1904, offering a coastal alternative to the Central Valley mainline.

Construction on the St. Francis Dam, located in Los Angeles County, began in 1924 to help store water imported from the Los Angeles Aqueduct (constructed between 1907 and 1913 by the Los Angeles Department of Water and Power, under the direction of William Mulholland). The dam collapsed in 1928, creating a massive flood throughout the Santa Clara River Valley that killed more than 450 people. The towns of Castaic Junction, Piru, Fillmore, Bardsdale, Santa Paula, and Saticoy were badly damaged and thousands of acres of farmland were washed away or covered with, in some areas, more than ten feet of silt and debris. The St. Francis Dam disaster is considered one of the worst catastrophes in California history.

Project Site Setting

The project site is located on a currently vacant, but previously developed ranch (see figure 2 in Section 4.0 Project Location). The site was formerly part of the Lisk Ranch homestead and today is the location of the existing trailhead for Pothole Trail as well as modern apiary activities. While no evidence of the homestead is present within the project site, the remains of a concrete lined water reservoir is located immediately west of the project site.

Town of Piru and Lake Piru

Piru, originally pronounced "pea-roo" and only later "pie-roo," comes from the Tataviam word for the tule reeds they used for basket construction. The town of Piru was established in 1887 by religious publisher David C. Cook, who wanted to establish a second Garden of Eden and thusly planted the fruits described in the Bible including apricots, dates, figs, grapes, olives, and pomegranates. Not coincidently, the year 1887 was also the year when the railroad was completed

through this area. The Piru Post Office was opened the following year in 1888. Center Street in Piru was part of the main route to the coast, before State Route 126 bypassed the town in the early 1940s.

United was formed in 1950, and the Santa Felicia Dam was constructed on Piru Creek in 1954, which formed Lake Piru. United owns the lake and surrounding land, totaling over 2,000 acres, and has developed recreational facilities for public use. Lake Piru is a destination for boating, hiking, biking, equestrian, and other recreational activities.

Geology and Paleontology of the Project Site

The project area is underlain by one mapped geologic unit: Quaternary (Holocene-age) alluvium (Dibblee and Ehrenspeck 1996). The site occurs at the contact between mapped Quaternary alluvium and Miocene-aged Monterey Shale. These mapped geologic features represent the approximate boundaries between geologic units at the surface and are not likely to be mapped exactly correctly in any one location. Therefore, either Quaternary alluvium or Monterey shale may occur at the surface within the project footprint. Furthermore, the Quaternary unit is likely relatively thin at the project site, as the site occurs on the south slope of an east-plunging anticline where surface erosion is expected to be high. Quaternary alluvium increases in age with depth and is ultimately underlain by Monterey Shale. The Monterey Shale is extensively mapped throughout the local vicinity and region and is known to produce abundant marine invertebrate and vertebrate fossils. At the surface, Holocene-age alluvium at the surface is unlikely to contain fossils, but it may become sufficiently old (i.e. 5000 years before present or older) at depth to support significant paleontological resources. The fossil-rich Monterey Shale occurs at unknown, but likely shallow depth, possibly within 5 feet of the surface.

The Monterey Shale is a cream-white, siliceous, thin-bedded, Miocene marine shale that crops out discontinuously along the California coast from San Diego to Humboldt counties. The Monterey Shale is richly fossiliferous, containing marine invertebrates, plants, and vertebrates, including whales and fish (Bagg, Jr. 1905; Bell et al. 2009; Boersma and Pyenson 2015; David 1943; Finger 1992; Hanna 1928; Kleinpell 1938). A search of the University of California Museum of Paleontology (UCMP) online collections database revealed 1237 localities in 22 counties in the Monterey Shale. Of these localities, 55 occur in Ventura County. The majority of these localities yielded exclusively marine microfossils (e.g., foraminiferans) and invertebrates, but at least two localities yielded vertebrate fossils (UCMP 2016).

Cultural Resources Records Search

On July 14, 2016, a search of the California Historical Resources Information Systems (CHRIS) at the South Central Coastal Information Center (SCCIC) was conducted (Appendix B). This search, which is what is typically used for CEQA compliance, was conducted to identify all previously recorded cultural resources and previously conducted cultural resources work within the project site and a 0.5-mile radius around it. The CHRIS search included a review of the NRHP, the CRHR, the California Points of Historical Interest list, the California Historical Landmarks list, the Archaeological Determinations of Eligibility list, and the California State Historic Resources Inventory list. The results of the SCCIC records search indicate that no previously recorded cultural resources are located within the project site. Two previously recorded resources were identified within the 0.5-mile buffer surrounding the project site:

- One historical archaeological site, an abandoned ranch (P-56-001562), and

- One historical structure, a monument and/or grave marker for Juan Jose Fustero (P-56-001625; P-100210). Although the SCCIC lists these resources as two separate sites, the descriptions, maps and photographs in the site records indicate they are the same resource. A review of the SCCIC's records suggests that the mapped location of P-100210 is incorrect, and that the mapped location of P-56-001625 is the actual location of the Fustero monument/grave marker.

The SCCIC records search also identified four previously conducted cultural resources studies: one of these was located adjacent the project site and three were outside of the project site. The project would occur in compliance with United's Historic Properties Management Plan (United 2011), which specifies procedures relating to cultural resource compliance within the Santa Felicia Dam/Lake Piru Perimeter Area Project.

Native American Scoping

As part of the process of identifying cultural resources issues for this project within or near the project site, Rincon contacted the Native American Heritage Commission (NAHC) to request a review of the Sacred Lands Files (SLF) (Appendix C). Rincon submitted the request to the NAHC on July 15, 2016. The NAHC faxed a response on July 21, 2016, stating that the SLF search came back with "negative results." The NAHC additionally provided a contact list of five Native American individuals or tribal organizations that may have knowledge of cultural resources in or near the project site. Rincon contacted each of the NAHC individuals and tribal organizations via email or U.S. mail on July 22, 2016 requesting information regarding their knowledge of the presence of cultural resources that may be impacted by this project. On August 4, 2016, Rincon followed up with an additional request for information. As of August 8, 2016, Rincon has received one response from Rudy Ortega, President of the Fernandeño Tataviam Band of Mission Indians. Mr. Ortega stated that Lake Piru is sensitive area with two villages in the vicinity: one north and one south of the lake. Mr. Ortega stated at that time that someone would follow up with Rincon at a later date; however, as of December 2017 Rincon has received no further comment from Mr. Ortega or the Fernandeño Tataviam Band of Mission Indians regarding any village sites in the area.

The proposed project design was initially developed as part of the Santa Felicia Project Recreation Trail Plan (United 2016b), which was submitted to FERC in April 2016. Assembly Bill 52 (AB52) was later passed on July 1, 2016, for consultation with Native American tribes. AB52 consultation was not conducted for this project because the project was developed prior to AB52; however, as described above, local tribes were contacted and input received and addressed in this Initial Study for the proposed project.

Field Survey and Site Evaluation

Field survey of the project site was conducted on July 20, 2016, including survey of the area in four sections; this was necessary due to the terrain type, vegetation, and marked boundaries. The entire project site, including access/entry points, is demarcated by wood posts. Survey methods consisted of systematic surface inspection of all accessible areas with transects walked at 15-meter intervals or less to ensure that all surface-exposed artifacts and sites could be identified. The ground surface was examined for the presence of prehistoric artifacts (e.g., flaked stone tools, tool-making debris, stone milling tools), historical artifacts (e.g., metal, glass, ceramics), sediment discoloration that might indicate the presence of a cultural midden, roads and trails, and depressions and other features that might indicate the former presence of structures or buildings (e.g., post holes, foundations).

The first section surveyed, Section 1, consists of the site of the proposed parking area and bathroom facilities. The development area is marked with rebar and wiring strung around the perimeter. This section was surveyed by walking east-west transects spaced no more than 10 meters apart. Section 2 consists of the perimeter of the project site and was surveyed by walking along the wire fencing marking the area. Section 3 consists of the access point leading to the proposed parking area and bathroom facilities location and was surveyed by walking north-south transects spaced no more than 15 meters apart. Section 4 consists of the access road from Piru Canyon Road to the proposed parking area and bathroom facilities location; this section was surveyed by walking transects adjacent to both sides of the road. Visibility throughout the surveyed area was excellent, averaging approximately 90 percent. The area adjacent to the access road had the poorest visibility, at approximately 30 percent.

The entire project site has been disturbed by previous activities on the Lisk Ranch, which originally existed on the site but was demolished and abandoned in the 1950s, and subsequent cattle leases (King Family) which expired in 2001. As previously described, the site was thoroughly disturbed during uses for ranching and grazing. In addition, United has been leasing the area to beekeepers since 2005. Remaining evidence of previous human activity, occupation, and disturbance is present in the form of disturbed ground and an empty, deteriorated cement-lined water pond (no longer operational, due to deterioration and siltation. Some modern trash is present, including charred cordage (possibly from sandbags), bee keeping materials, a boat battery, shotgun shells, rope, and metal and PVC pipes. Faunal remains of a large mammal are also present, likely cow bones associated with previous use of the area for livestock grazing. The remains of a concrete-lined water reservoir that may be historic in age, associated with the Lisk Ranch homestead, is located outside of the project area and was noted but not formally recorded.

The survey of the project site was negative for cultural resources. Based on the results of the records search, Native American scoping, and field survey and site evaluation, it is recommended that a finding of *no impact to historical resources* be determined for the current undertaking.

Methodology and Significance Thresholds

The significance of a cultural and/or paleontological resource and impacts to the resource is determined by whether or not that resource can increase the collective knowledge regarding the past. The primary determining factors are site content and degree of preservation.

For the purpose of this analysis, a significant impact would occur if physical changes that could be facilitated by buildout of the proposed project would result in the following conditions, listed in Appendix G of the *State CEQA Guidelines.*

1. Cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines §15064.5;
2. Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines §15064.5;
3. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature; and/or
4. Disturb any human remains, including those interred outside of formal cemeteries.

A “substantial adverse change” in the significance of a historical resource is defined as “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.” CEQA Guidelines

Section 15064.5(b) states that the significance of an historical resource is "materially impaired" when a project does any of the following:

- Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for inclusion in the California Register of Historical Resources;
- Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources... or its identification in an historical resources survey..., unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
- Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

CEQA Guidelines Section 15064.5 also states that the term "historical resources" shall include the following:

- A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in, the California Register of Historical Resources (Pub. Res. Code Section 5024.1, Title 14 CCR, Section 4850 et. seq.).
- A resource included in a local register of historical resources, as defined in Section 5020.1(k) of the Public Resources Code or identified as significant in an historical resource survey meeting the requirements of Section 5024.1(g) of the Public Resources Code, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
- Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing in the California Register of Historical Resources (Public Resources Code Section 5024.1, Title 14 CCR, Section 4852) as follows:
  (A) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
  (B) Is associated with the lives of persons important in our past;
  (C) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
  (D) Has yielded, or may be likely to yield, information important in prehistory or history. (Guidelines Section 15064.5)

Paleontological Sensitivity

Significant paleontological resources are fossils or assemblages of fossils that are unique, unusual, rare, uncommon, diagnostically important, or are common but have the potential to provide valuable scientific information for evaluating evolutionary patterns and processes, or which could improve our understanding of paleochronology, paleoecology, paleophylogeography or depositional histories. New or unique specimens can provide new insights into evolutionary history; however, additional specimens of even well represented lineages can be equally important for studying evolutionary pattern and process, evolutionary rates and paleophylogeography. Even unidentifiable material can provide useful data for dating geologic units if radiocarbon dating is possible. As such, common fossils (especially vertebrates) may be scientifically important, and therefore considered highly significant.

The SVP (2010) describes sedimentary rock units as having a high, low, undetermined, or no potential for containing significant nonrenewable paleontological resources. This criterion is based on rock units within which vertebrate or significant invertebrate fossils have been determined by previous studies to be present or likely to be present. Significant paleontological resources are fossils or assemblages of fossils, which are unique, unusual, rare, uncommon, diagnostically or stratigraphically important, and those which add to an existing body of knowledge in specific areas, stratigraphically, taxonomically, or regionally. While these standards were specifically written to protect vertebrate paleontological resources, all fields of paleontology have adopted these guidelines. Rincon has evaluated the paleontological sensitivity of the proposed project site according to the following SVP (2010) categories:

I. **High Potential (sensitivity).** Rock units from which significant vertebrate or significant invertebrate fossils or significant suites of plant fossils have been recovered are considered to have a high potential for containing significant non-renewable fossiliferous resources. These units include but are not limited to, sedimentary formations and some volcanic formations which contain significant nonrenewable paleontological resources anywhere in their geographical extent, and sedimentary rock units temporally or lithologically suitable for the preservation of fossils. Sensitivity comprises both (a) the potential for yielding abundant or significant vertebrate fossils or for yielding a few significant fossils, large or small, vertebrate, invertebrate, or botanical and (b) the importance of recovered evidence for new and significant taxonomic, phylogenetic, ecologic, or stratigraphic data. Areas which contain potentially datable organic remains older than Recent, including deposits associated with nests or middens, ranch dump sites, and areas which may contain new vertebrate deposits, traces, or trackways are also classified as significant.

II. **Low Potential (sensitivity).** Sedimentary rock units that are potentially fossiliferous but have not yielded fossils in the past or contain common and/or widespread invertebrate fossils of well documented and understood taphonomic, phylogenetic species and habitat ecology. Reports in the paleontological literature or field surveys by a qualified vertebrate paleontologist may allow determination that some areas or units have low potentials for yielding significant fossils prior to the start of construction. Generally, these units will be poorly represented by specimens in institutional collections and will not require protection or salvage operations. However, as excavation for construction gets underway it is possible that significant and unanticipated paleontological resources might be encountered and require a change of classification from Low to High Potential and, thus, require monitoring and mitigation if the resources are found to be significant.

III. **Undetermined Potential (sensitivity).** Specific areas underlain by sedimentary rock units for which little information is available are considered to have undetermined fossiliferous potentials. Field surveys by a qualified vertebrate paleontologist to specifically determine the potentials of the rock units are required before programs of impact mitigation for such areas may be developed.

IV. **No Potential.** Rock units of metamorphic or igneous origin are commonly classified as having no potential for containing significant paleontological resources.

Project Impacts and Mitigation Measures

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

Development of the proposed project would occur on an undeveloped site currently used for accessing the Pothole trailhead and bee keeping. The National Register of Historic Places, California Register of Historical Resources, and the Ventura County Cultural Heritage Program do not list any historic resources on the project site (NRHP 2016; VCCHP 2016). There are no structures or significant sites on the project site and therefore there are no historic resources as defined in CEQA Guidelines §15064.5. Therefore, there would be no impacts to historic resources from implementation of the proposed project.

NO IMPACT

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

The vicinity of Lake Piru has a long cultural history and is known to have been home to the Tataviam tribe prior to settlement by Euro-Americans. Archaeological materials associated with their occupation may exist on the project site and have the potential to provide important scientific information regarding history and prehistory. As discussed above, no recorded prehistoric or historic archeological sites are present on or adjacent to the project site. Therefore, project implementation would not affect any known cultural resources.

Ground-disturbing activities associated with the proposed project have the potential to damage or destroy undiscovered historic or prehistoric archaeological resources that may be present below the ground surface, particularly during project excavation. As previously described, the site has historically been thoroughly disturbed during uses for ranching and grazing. Remaining evidence of previous human activity, occupation, and disturbance is present in the form of disturbed ground and an empty, deteriorated cement-lined water pond (no longer operational, due to deterioration and siltation). Consequently, damage to or destruction of sub-surface cultural resources would be unlikely as a result of the proposed project, which requires minimal ground disturbance; however, the potential for encountering unknown resources is present and therefore mitigation is necessary to ensure that potential impacts to subsurface cultural resources are reduced to a less than significant level.

Mitigation Measures

The following mitigation measures would be implemented to mitigate potentially significant impacts relating to the possible discovery of intact cultural resources during project construction. These measures would apply to all phases of project construction.

CR-1a **Procedures for Discovery of Intact Cultural Resources.** In the event that archaeological resources are unearthed during project construction, all ground-disturbing work within the vicinity of the find must be temporarily suspended or redirected until an archaeologist has evaluated the nature and significance of the find. After the find has been evaluated and protected or removed, work in the area may resume.

CR-1b **Procedures for Discovery of Human Remains.** If human remains are unearthed, no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code Section 5097.98. If the remains are determined to be of Native American descent, the California Native American Heritage Commission shall be notified within 24 hours.

POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED

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

The project site is directly underlain by Holocene-aged alluvial sediments (Dibblee and Ehrenspeck 1996), and possibly the Miocene Monterey Shale. Holocene-aged alluvium does not have a record of abundant and diverse fossils and is generally considered to have low paleontological sensitivity. However, middle and early Holocene units are sufficiently old to support significant paleontological resources and are considered to have high paleontological sensitivity at depths of five-feet or great below the surface.

The Monterey Shale has a robust and diverse fossil record that includes scientifically significant invertebrates and vertebrates. The Monterey shale is considered to have high paleontological sensitivity based on abundance and scientific importance of its fossil record.

Ground disturbance associated with the construction of the proposed project has the potential to directly disturb middle and early Holocene units and the Monterey Shale. Impacts to paleontological resources resulting from ground disturbing construction activity could include damage or destruction of fossils, or loss of geologic context for fossils, and would be considered a significant impact without mitigation.

Mitigation Measures

The following mitigation measures would be implemented to mitigate potentially significant impacts relating to the possible discovery of intact paleontological resources during project construction. These measures would apply to all phases of project construction.

CR-2(a) **Paleontological Worker Environmental Awareness Program.** Prior to the start of construction, construction personnel shall be informed on the appearance of fossils and the procedures for notifying paleontological staff should fossils be discovered by construction staff.

CR-2(b) **Paleontological Mitigation and Monitoring Program.** Any excavations exceeding five feet in depth shall be monitored on a full-time basis by a qualified paleontological monitor until at least 50 percent of the grading or excavation is completed. After 50 percent of the grading or excavation is complete, the Principal Paleontologist may amend the monitoring and mitigation schedule. Ground disturbing activity that does not exceed five feet in depth in young alluvium does not require paleontological monitoring.

The Paleontological Mitigation and Monitoring Program shall be supervised by a qualified paleontologist - an individual with an M.S. or Ph.D. in paleontology or geology who is experienced with paleontological procedures and techniques, who is knowledgeable in the geology of California, and who has worked as a paleontological mitigation project supervisor for a least one year. Monitoring shall be conducted by a qualified paleontological monitor – an individual who has experience with collection and salvage of paleontological resources.

If fossils are discovered, the qualified paleontologist (or paleontological monitor) shall recover them. Once salvaged, fossils shall be identified to the lowest possible taxonomic level, prepared to a curation-ready condition, and curated in a scientific institution with a permanent paleontological collection, along with all pertinent field notes, photos, data, and maps.

Upon completion of ground disturbing activity (and curation of fossils if necessary) the qualified paleontologist shall prepare a final mitigation and monitoring report outlining the results of the mitigation and monitoring program. The report shall include discussion of the location, duration and methods of the monitoring, stratigraphic sections, any recovered fossils, and the scientific significance of those fossils, and where fossils were curated.

POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED

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

Human burials outside of formal cemeteries often occur in prehistoric archeological contexts. The project site is undeveloped but previously disturbed, and the project would involve minimal ground disturbance. However, human burials, in addition to being potential archaeological resources, have specific provisions for treatment in Section 5097 of the California Public Resources Code. The California Health and Safety Code (Sections 7050.5, 7051, and 7054) has specific provisions for the protection of human burial remains. Existing regulations address the illegality of interfering with human burial remains, and protects them from disturbance, vandalism, or destruction. Public Resources Code §5097.98 also addresses the disposition of Native American burials, protects such remains, and established the Native American Heritage Commission to resolve any related disputes.

Implementation of these regulations and Mitigation Measure CR–1b would ensure that development of the proposed project would have a less that significant impact from potential disturbance of human remains, including those interred outside of formal cemeteries. Impacts will be less than significant with mitigation incorporated.

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6 Geology and Soils

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project have any of the following impacts?				
a. Expose people or structures to potentially substantial adverse effects, including the risk of loss, injury, or death involving:				
1. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault	☐	☐	■	☐
2. Strong seismic ground shaking	☐	☐	■	☐
3. Seismic-related ground failure, including liquefaction	☐	☐	■	☐
4. Landslides	☐	☐	■	☐
b. Result in substantial soil erosion or the loss of topsoil	☐	☐	■	☐
c. Be located on a geologic unit or soil that is made unstable as a result of the project, and potentially result in on or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse	☐	☐	■	☐
d. Be located on expansive soil, as defined in Table 1-B of the Uniform Building Code, creating substantial risks to life or property	☐	☐	■	☐
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater	☐	☐	☐	■

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

Alquist-Priolo Earthquake Zones are defined as zones which delineate areas of known active faults, as defined by the State of California; the project site is not located within a defined Alquist-Priolo Earthquake Zone. However, the project is located within a seismically active area of southern California, and there are known active fault zones in the project area. The project would not introduce new residents or structures to the area such that increased risk associated with a seismic event would occur. Under the proposed project, use of the site would likely increase due to improved access and parking; however, increased usage would be comprised of local recreationists already utilizing facilities and recreational opportunities in the area. The project would have no effect on the potential for seismic events to occur and would not substantially increase the risk of impact from an earthquake to people or structures in the area. Therefore, potential impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

a.2. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?

As noted above, the project is located in a seismically active area of southern California. The project would likely increase recreational use of the site, but that increased use would be comprised of recreationists who are already active in the area. Implementation of the project would not increase the potential for strong seismic ground shaking to occur in the project area. The only structure proposed under the project is the restroom facility, which would not pose substantial threat associated with seismic ground shaking. Therefore, potential impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

a.3. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?

Liquefaction is a process whereby soil is temporarily transformed to fluid form during intense and prolonged ground shaking or because of a sudden shock or strain. Liquefaction typically occurs in areas where the groundwater is less than 30 feet from the surface and where the soils are composed of poorly consolidated fine to medium sand. As discussed in Section 9, “Existing Conditions”, soils in the project area are easily eroded and susceptible to debris flows, especially when severe wildfire events are followed by storms. It is possible that seismically-related ground failure could occur during construction or operation of the project. However, the project site is currently used for recreational purposes and implementation of the project would have no effect on the potential for seismic-related ground failure to occur. Therefore, potential impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

a.4. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?

The site is adjacent to an approximately 120-foot-tall ridgeline with plateau on top. It is possible that in the event of a strong seismic event, the project site could be affected by a landslide event.

However, this is an existing condition that would not be altered by the proposed project. Recreationists currently visit the proposed project site, and although the project would likely result in increased visitation to the trailhead parking area, such usage would be temporary and of short (mostly daily) duration. The project would therefore not affect the site's susceptibility to landslide hazards or introduce new substantial hazards. Potential impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

As described in Section 9, soils in the project area are generally susceptible to erosion. Ground-disturbing activities would occur during project construction; however, project design features described in Section 9 would include the implementation of BMPs to avoid or minimize erosion potential. Further, the project requires minimal grading to maintain the direction of surface drainage to the north, towards Lisk Creek.

The trailhead parking area would be covered with compacted gravel, in a grade designed to maintain existing drainage patterns. This surface material would not affect soil erosion or the loss of topsoil on the project site; however, either option would increase the potential for downstream erosion to occur as a result of increased surface water runoff across the project site. Project design features listed in Section 9 include erosion control measures and drainage BMPs including directing surface flows away from impermeable surfaces (such as the proposed parking area surface); these measures would maintain existing drainage patterns as much as feasible and slow the velocity of increased surface runoff resulting from the parking area surface (comprised of packed gravel or base material). Additionally, the design of the proposed project would address existing erosion issues at the project site, particularly where the access/spur roads are currently deeply rutted by surface flows, thereby resulting in improved circumstances. As discussed in the description of the proposed project, the lower (northern) road will be abandoned in-place as part of the project, and the upper (southern) spur road will provide access to and from the project site; this road is outside of the stream's flow path, and existing ruts in this road will be repaired during project implementation. Potential impacts related to erosion and loss of topsoil impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

There are hillsides in the project area that may be susceptible to geologic hazards. However, the project site is currently used for access to the adjacent wilderness area, and although the project may increase use of the trailhead parking area and the Pothole trailhead, this would not affect the potential for existing geologic hazards such as landslide, lateral spreading, subsidence, liquefaction, or collapse to occur. Implementation of project design features listed in Section 9 would ensure that the project does not exacerbate existing hazards, such as through implementation of a SWPPP to control and contain potential erosion resulting from construction activities. Operation of the site would not affect existing geologic hazards and would not involve additional ground-disturbing activities. Potential impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

Expansive soils are clay-based, and subject to changes in volume and settlement in response to wetting and drying. The project site is characterized more by sandy soils and cobbles, and expansive soils have not been identified on the project site. The only structure included under the project is the restroom facility, which would include toilets of a vault design, provided in pre-cast concrete. The use of this structure would not introduce hazards associated with the potential presence of expansive soils, due to both structure design, and the nature of the structure being for intermittent use by visitors to the site. Potential impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

The project involves the installation of a vault-style toilet housed in a restroom facility. Vault toilets do not use water for flushing. Wastes collect in a tank, which is pumped out when full. This restroom design is currently used by both the Forest Service and United. A passive ventilation system dries the waste and minimizes odors. The waste is then transported to an approved facility for disposal. The project will not install septic tanks or other wastewater disposal systems. Therefore, no impact would occur.

NO IMPACT

7 Greenhouse Gas Emissions

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project have any of the following impacts?				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment	☐	☐	■	☐
b. Conflict with any applicable plan, policy, or regulation adopted to reduce the emissions of greenhouse gases	☐	☐	☐	■

Climate change is the observed increase in the average temperature of the earth's atmosphere and oceans along with other substantial changes in climate (such as wind patterns, precipitation, and storms) over an extended period. Climate change is the result of numerous, cumulative sources of greenhouse gases (GHG), which contribute to the "greenhouse effect," a natural occurrence that helps regulate the temperature of the planet. The majority of radiation from the sun hits the earth's surface and warms it. The surface in turn radiates heat back towards the atmosphere, known as infrared radiation. Gases and clouds in the atmosphere trap and prevent some of this heat from escaping into space and re-radiate it in all directions. This process is essential to support life on Earth because it warms the planet by approximately 60° Fahrenheit. Emissions from human activities since the beginning of the industrial revolution (approximately 250 years ago) are adding to the natural greenhouse effect by increasing the gases in the atmosphere that trap heat and contribute to an average increase in Earth's temperature.

GHGs occur naturally and from human activities. Human activities that produce GHGs include fossil fuel burning (coal, oil, and natural gas for heating and electricity, gasoline and diesel for transportation); methane generated by landfill wastes and raising livestock; deforestation activities; and some agricultural practices. GHGs produced by human activities include carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFC), perfluorocarbons (PFC), and sulfur hexafluoride (SF_6). Since 1750, estimated concentrations of CO_2, CH_4, and N_2O in the atmosphere have increased over by 36 percent, 148 percent, and 18 percent respectively, primarily due to human activity. Emissions of GHGs affect the atmosphere directly by changing its chemical composition. Changes to the land surface indirectly affect the atmosphere by changing the way in the Earth absorbs gases from the atmosphere. Potential impacts in California of global warming may include loss of snow pack, sea level rise, more extreme heat days per year, more high ozone days, more large forest fires, and more drought years (California Energy Commission [CEC] 2009).

CEQA Guidelines provide regulatory direction for the analysis and mitigation of GHG emissions appearing in CEQA documents, while giving lead agencies the discretion to set quantitative or qualitative thresholds for the assessment and mitigation of GHGs and climate change impacts. To date, agencies such as the Bay Area Air Quality Management District (BAAQMD), the South Coast Air Quality Management District (SCAQMD), and the San Joaquin Air Pollution Control District (SJVAPCD) have adopted significance thresholds for GHGs. The VCAPCD has not yet adopted GHG emission significance thresholds for projects in their jurisdiction.

Given that Ventura County is adjacent to the SCAQMD jurisdiction and is part of the Southern California Association of Governments (SCAG) region, the VCAPCD recommends use of local GHG emission thresholds of significance for land use development projects at levels consistent with those set by the SCAQMD (VCAPCD 2011).

In the latest guidance provided by the SCAQMD's GHG CEQA Significance Threshold Working Group in September 2010, SCAQMD considered a tiered approach to determine the significance of residential and commercial projects. The draft tiered approach is outlined in the meeting minutes, dated September 29, 2010.

- **Tier 1.** If the project is exempt from further environmental analysis under existing statutory or categorical exemptions, there is a presumption of less than significant impacts with respect to climate change. If not, then the Tier 2 threshold should be considered.
- **Tier 2.** Consists of determining whether or not the project is consistent with a GHG reduction plan that may be part of a local general plan, for example. The concept embodied in this tier is equivalent to the existing concept of consistency in CEQA Guidelines section 15064(h)(3), 15125(d) or 15152(a). Under this Tier, if the proposed project is consistent with the qualifying local GHG reduction plan, it is not significant for GHG emissions. If there is not an adopted plan, then a Tier 3 approach would be appropriate.
- **Tier 3.** Establishes a screening significance threshold level to determine significance. The Working Group has provided a recommendation of 3,000 MT of CO_2e per year for commercial/residential projects and 10,000 MT of CO_2e per year for industrial projects.
- **Tier 4.** Establishes a service population threshold to determine significance. The Working Group has provided a recommendation of 4.8 MT of CO_2e per year for land use projects.

Because Ventura County does not have a qualified GHG reduction plan, the proposed project is evaluated based on the SCAQMD's recommended Tier 3 significance threshold of 3,000 MT of CO_2e per year. The 3,000 MT of CO_2e per year Tier 3 screening level threshold is intended to assess commercial/residential projects and, although the project is not a commercial/residential land use, it is the most appropriate threshold for the proposed project.

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

The project's proposed construction activities, energy use, daily operational activities, and mobile sources (traffic) would generate GHG emissions. CalEEMod was used to calculate emissions resulting from project construction and long-term operation. Project-related construction emissions are confined to a relatively short period of time in relation to the overall life of the proposed project. Therefore, construction-related GHG emissions were amortized over a 30-year period to determine the annual construction-related GHG emissions over the life of the project. As shown in Table 6, the project construction would result in an average of approximately 0.9 MT of CO_2e per year. Table 7 shows the combined annual GHG emissions from construction and operation of the project.

Table 6 Estimated Construction GHG Emissions

Year	Project Emissions MT/yr CO_2e
Total	27.3
Total Amortized over 30 Years	0.9

See Appendix A for CalEEMod worksheets.

Table 7 Combined Annual Emissions of Greenhouse Gases

Emission Source	Annual Emissions (CO_2e) in metric tons
Construction	0.9
Operational	
Area	<0.1
Energy	<0.1
Solid Waste	<0.1
Water	<0.1
Mobile	
CO_2 and CH_4	0.6
N_2O	<0.1
Total	**1.9**

See Appendix A for CalEEMod worksheets.

As shown in Table 7, total annual GHG emissions from the project would be approximately 2 MT of CO_2e per year, which is well below the SCAQMD threshold of 3,000 MT of CO_2e per year. Therefore, GHG emissions from the project would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

The VCAPCD has not adopted a plan, policy, or regulations for the purpose of reducing the emission of GHGs. Further, the project would not result in any increase in population or increased demand on energy resources. Therefore, the project would not conflict with any plans or policies aimed at reducing GHG emissions and no impact would occur.

NO IMPACT

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8 Hazards and Hazardous Materials

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

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
h. Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands	☐	☐	■	☐

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

During project construction, potentially hazardous materials such as fuels and lubricants would be used to operate vehicles and equipment. With the implementation of standard BMPs such as those described in the project design features (see Section 9, "Description of the Project"), these types of materials would be appropriately handled to avoid adverse impacts.

During operation of the project, maintenance trucks would regularly access the site to clean waste out of the trash and toilet facilities and transport it to approved facilities for disposal. These are not considered hazardous materials, but the trucks transporting them would be large diesel-fueled vehicles, and an unanticipated accident could result in a release of fuel. Trucks would access the site using Piru Canyon Road, which is operated and maintained by the Forest Service along the portion between the Juan Fernandez Launch Ramp Facility and the proposed project site; this portion of the road includes sharp turns and sections of disrepair, mostly characterized by broken pavement and potholes. In order to avoid potential impacts associated hazardous roadway conditions, Mitigation Measure HAZ-1 would be implemented to provide appropriate signage and ensure that truck operators are aware of road conditions. An extensive signage plan will be required to ensure public and worker safety.

Mitigation Measures

The following mitigation measure would be implemented to mitigate potentially significant impacts associated with the condition of Piru Canyon Road. This measure would apply to all phases of project construction and operation.

HAZ-1 **Provide Signage Regarding Road Conditions.** Signs shall be clearly posted along Piru Canyon Road with information regarding the condition of Piru Canyon Road, as well as a map of Piru Canyon Road, showing its route between the entrance to the Lake Piru Recreation Area and the proposed project site. These signs shall be posted in the following locations, at a minimum: at the entrance to the Lake Piru Recreation Area (at or near the gatehouse), and at the turn-off from Piru Canyon Road for the Juan Fernandez Launch Ramp Facility.

POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED

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

The proposed project would improve a previously disturbed site to provide a parking area and improved access to the existing trails in the area. Hazardous materials would not be utilized during construction or operation, with the exception of vehicle fuels and lubricants needed to operate equipment, machinery, and vehicles. These materials are commonly used in the area for accessing and maintaining recreational sites. Standard BMPs (such as those described in Section 9) and handling procedures ensure that there are no reasonably foreseeable upset and accident conditions. In addition, Mitigation Measure HAZ-1, to be implemented above for criterion (a), would provide signage to ensure that truck operators are aware of potentially hazardous road conditions, to avoid the potential for unanticipated accidents that could result in the release of hazardous materials such as vehicle fuels and lubricants. Potential impacts would be less than significant with mitigation incorporated.

POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED

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

The nearest existing school is Piru Elementary School, located approximately 11.7 miles to the southwest of the project site. The project would not emit hazardous emissions or handle hazardous materials within 0.25 mile of a school. No impact would occur.

NO IMPACT

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

The following databases compiled pursuant to Government Code Section 65962.5 were checked in July 2016 for known hazardous materials contamination at the project site:

- Underground Storage Tanks (UST): The UST database contains registered USTs. This database is maintained by the State Water Resources Control Board.
- Leaking Underground Storage Tanks (LUST): LUST records contain an inventory of reported leaking underground storage tank incidents. This database is maintained by the State Water Resources Control Board.
- RCRA (TSD, LQG, SQG): RCRAInfo is U.S. EPA's comprehensive information system providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and solid Waste Amendments (HSWA) of 1984.
- FINDS: Facility Index System. Contains both facility information and pointers to other sources that contain more detail.

No hazardous materials sites were identified on the proposed project site, and therefore no impact would occur.

NO IMPACT

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

The nearest airport to the project site is the Santa Paula Airport, located approximately 20.4 miles to the southwest. The project is not located within an airport land use plan or within two miles of a public airport or public use airport. The project would not impact airport operations, alter air traffic patterns, or conflict with established Federal Aviation Administration (FAA) flight protection zones. No impact would occur.

NO IMPACT

f. For a project near a private airstrip, would it result in a safety hazard for people residing or working in the project area?

As noted above, the nearest airport to the project site is 20.4 miles away. The project is not located near a private airstrip and would not result in associated hazards. No impact would occur.

NO IMPACT

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

The proposed project would not involve the development of structures that could potentially impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. The project would improve access to the parking area by repairing the existing access/spur road. Implementation of the project would increase vehicle travel on the portion of Piru Canyon Road between the Juan Fernandez Launch Ramp Facility and the proposed project site, but this would not impede any adopted emergency response plan or emergency evacuation plan. Therefore, no impact would occur.

NO IMPACT

h. Would the project expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

The project site is in a rural area in unincorporated Ventura County, and is adjacent to open space land subject to wildland fires. According to Cal Fire (2007), the site is located in a high fire hazard severity zone. Construction and operation of the project would include the use of motorized vehicles and equipment which would be properly maintained in compliance with project design features to avoid the potential for sparks to initiate a wildland fire. Therefore, the project would not expose people or structures to a significant risk of loss, injury or death involving wildland fire. Potential impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

9 Hydrology and Water Quality

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project have any of the following impacts?				
a. Violate any water quality standards or waste discharge requirements	☐	☐	■	☐
b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering or the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level that would not support existing land uses or planned uses for which permits have been granted)	☐	☐	☐	■
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation on- or off-site?	☐	☐	☐	■
d. Substantially alter the existing drainage pattern of the site or area, including the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on or offsite	☐	☐	☐	■
e. Create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff	☐	☐	■	☐
f. Otherwise substantially degrade water quality	☐	☐	■	☐
g. Place housing in a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary, Flood Insurance Rate Map, or other flood hazard delineation map	☐	☐	☐	■

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
h. Place structures in a 100-year flood hazard area that would impede or redirect flood flows	☐	☐	☐	■
i. Expose people or structures to a significant risk of loss, injury, or death involving flooding, including that occurring as a result of the failure of a levee or dam	☐	☐	☐	■
j. Result in inundation by seiche, tsunami, or mudflow	☐	☐	☐	■

a. Would the project violate any water quality standards or waste discharge requirements?

Construction of the project would include grading activities that may result in soil erosion and sedimentation that could degrade water quality; however, the implementation of project design features described in Section 9, and compliance with existing laws and regulations would minimize or avoid such effects. Per Ventura County Ordinance Number 4450 relating to stormwater quality management for unincorporated areas and the California State Construction General Permit (Order No. 2009-2009-DWQ), the project would implement a Stormwater Pollution Prevention Plan (SWPPP), including BMPs to protect water quality. Therefore, potential impacts associated with water quality standards and waste discharge requirements would be less than significant.

LESS THAN SIGNIFICANT IMPACT

b. Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering or the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level that would not support existing land uses or planned uses for which permits have been granted)?

The proposed project would require temporary water use for dust abatement during construction and to periodically clean the restroom facility during operations. All necessary water would be obtained from local sources and delivered to the project site via water trucks. There are no groundwater wells on-site and no new wells would be installed to support the project. Water use associated with the project would be minimal and provided by approved sources currently in use by United.

The project would introduce new surfaces in the form of packed gravel; however, such materials would be limited to not more than one acre of the parking area and would not interfere with recharge to the overall groundwater basin. Therefore, surfacing of the proposed parking area would not adversely impact groundwater recharge rates or patterns, and the project would not substantially interfere with groundwater recharge or deplete groundwater resources.

LESS THAN SIGNIFICANT IMPACT

c. Would the project substantially alter the existing drainage pattern of the site or area, including by altering the course of a stream or river, in a manner that would result in substantial erosion or siltation on or offsite?

The project would not alter the course of any stream or river. Closure and rehabilitation of the northern spur road to the project site would direct flows into the existing Lisk Creek to maintain natural drainage patterns (as opposed to flows concentrating on the roadway, as occurs under existing conditions). The project would introduce new surfaces in the form of packed gravel on the site, and drainage improvements would be implemented to direct surface flows away from impermeable areas to maintain natural drainage patterns and avoid potential impacts associated with erosion. In addition, as discussed under previous impact analyses, project design features would include the implementation of erosion control measures to avoid adverse impacts associated with erosion and sedimentation, including but not limited to the implementation of a SWPPP. Therefore, potential impacts associated with erosion or sedimentation on- or off-site would be less than significant.

LESS THAN SIGNIFICANT IMPACT

d. Would the project substantially alter the existing drainage pattern of the site or area, including the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on or offsite?

As noted, the project would not alter the course of any stream or river. No work would be conducted within Lisk creek, and disturbance to the creek by visitors of the parking area would be discouraged using clear signage and trail markers.

As discussed above, the project would utilize packed gravel or a material of comparable material on the parking area. The use of this type of material would maintain more pervious surfaces throughout the project site than the use of hard pavement, thereby minimizing potential impacts associated with increased flooding on- or off-site. The use of hard pavement on the parking area surface would increase impervious areas, which could potentially result in increased flooding on- or off-site. Drainage design features such as gutters and slope control would be implemented to direct surface water flows and avoid potential impacts associated with flooding. Potential impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

e. Would the project create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

The project site is not near or connected to any stormwater drainage systems. The project site would be covered with packed gravel or a material of comparable permeability. As described above in the discussion of potential flooding impacts, the use of packed gravel on the proposed trailhead parking area facility surface would provide a more permeable surface than the use of hard pavement (which was determined to be infeasible due to the potential for stormwater runoff related issues). Drainage design features would be installed to direct surface flows and avoid adverse impacts. Therefore, effects on stormwater runoff rates and patterns would be minimal. The concreate pad used for the restroom facility would be impervious, but due to its small size in comparison with the project site it would have a negligible impact on stormwater runoff.

The proposed project includes onsite drainage improvements consisting of a surface flow dissipater located at the site perimeter. These improvements would include perimeter fencing along the northern and western sides of the trailhead parking area. The flow dissipater would be situated behind perimeter fencing. A drainage structure will be placed every 50 feet around the perimeter. Grade of the parking area would be configured with an approximately two percent slope, consistent with existing conditions and directing surface runoff flows towards the dissipater area to minimize potential impacts associated with runoff and erosion. Therefore, the project does not provide substantial additional sources of polluted runoff and potential impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

f. Would the project otherwise substantially degrade water quality?

As described in Section 9, soils in the project area are generally susceptible to erosion. Ground-disturbing activities would occur during project construction; however, project design features described in Section 9 would include the implementation of BMPs to avoid or minimize erosion potential. Further, the project requires minimal grading to maintain the direction of surface drainage to the north, towards Lisk Creek. Additionally, the trailhead parking area would be covered with compacted gravel or a material of comparable permeability, in a grade designed to maintain existing drainage patterns (maximum two percent slope). The use of compacted gravel for the proposed trailhead parking area facility surface would minimize the potential for increased surface water runoff rates and associated increases in off-site erosion and sedimentation by maintaining permeability of the ground surface. Conversely, the use of hard pavement such as asphalt would contribute to increased surface water runoff rates by introducing new impermeable areas, and this option is therefore not considered part of the proposed project. The project would decrease the amount of sediment transported offsite because surfacing of the project site will prevent sheetflow over the current exposed dirt surface. Adherence to the project design features and BMPs described in Section 9 would ensure that impacts to turbidity would be less than significant.

LESS THAN SIGNIFICANT IMPACT

g. Would the project place housing in a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary, Flood Insurance Rate Map, or other flood hazard delineation map?

The proposed project would not introduce new housing and would not alter existing drainage patterns such that existing housing would be placed within a flood hazard area. Therefore, no impact would occur. The project site is not located within a FEMA-designated 100-year flood hazard area. FEMA has not prepared flood hazard maps for Piru Canyon upstream of Santa Felicia Dam.

NO IMPACT

h. Would the project place in a 100-year flood hazard area structures that would impede or redirect flood flows?

The project site is not located within an area that has been delineated by FEMA for flood hazards. However, the site is situated above the Lisk Creek bed and is not subject to substantial flood hazards. Therefore, no impact would occur.

NO IMPACT

i. Would the project expose people or structures to a significant risk of loss, injury, or death involving flooding including that occurs as a result of the failure of a levee or dam?

The project site is located approximately 18 miles downstream of the Pyramid Dam. The site is located approximately 0.35 mile to the west and 70 feet above the current bed of Piru Creek. In the unlikely event of a dam failure, it would be unlikely for the site to be inundated by floodwaters. Additionally, although the project would increase use of the trailhead parking area, the project would not introduce new residents or habitable structures to the area, and potential impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

j. Would the project result in inundation by seiche, tsunami, or mudflow?

The project site is not located near any coastline and is not subject to inundation by tsunami. The site is located adjacent to the Lake Piru reservoir; however, elevation of the project site is approximately 1,120 feet above sea level (amsl), 115 feet above the Lake Piru reservoir's maximum elevation of 1,055 feet amsl (United 2009). Therefore, the site is not considered at risk of inundation from a seiche event.

There are hillside surrounding the project site that may be susceptible to mudflow, should precipitation events of extended duration result in complete soil saturation. However, the project site is currently utilized as a trailhead, and improvement of the trailhead that would occur under the project would not alter existing hazards. Potential impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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10 Land Use and Planning

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project have any of the following impacts?				
a. Physically divide an established community	☐	☐	☐	■
b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect	☐	☐	☐	■
c. Conflict with an applicable habitat conservation plan or natural community conservation plan	☐	☐	☐	■

a. Would the project physically divide an established community?

The project consists of improving a previously disturbed area located approximately 11.5 miles northwest of the unincorporated community of Piru, to accommodate the parking of vehicles and trailers at this site. The site is located in the Piru Lake Recreation Area and is designated as Open Space. The site is surrounded by Forest Service land and the Lake Piru Recreation Area. Construction of the project would not physically divide an established community.

NO IMPACT

b. Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

The project is situated in the scenic viewshed of the Lake Piru reservoir and is designated as Open Space and Scenic Resource Protection (SRP). This zoning designation requires Planning Director approval of a development permit as the site will disturb more than 1,000 square feet or more of native vegetation (Sec. 8109-4.1 (Ventura County, 2016)). The project would obtain a permit from Ventura County per Sec. 8107-25 for alterations of trees and will use a certified arborist for any tree-related work. The project is designed to meet the requirements for a discretionary development permit. United will be required to obtain a zone clearance and building permit for the proposed restroom structure. The rehabilitation of the existing access/spur road will be done with native vegetation and be consistent with United's Vegetation and Noxious Weed Management Plan (2010). The project would therefore not conflict with any applicable land use plan, policy, or regulations. No impact would occur.

NO IMPACT

c. Would the project conflict with an applicable habitat conservation plan or natural community conservation plan?

As discussed in Section 4, *Biological Resources,* the project site does not occur in any adopted HCP area, NCCP area, or other approved local, regional, or state habitat conservation plan. Therefore, the project would not conflict with the provisions of an adopted HCP, NCCP, or other approved local, regional, or state conservation plan. No impact would occur.

NO IMPACT

11 Mineral Resources

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

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

The two principal mineral resources located in Ventura County are petroleum and aggregate. Aggregates include sand, gravel, and rock which are used for fill, construction-grade concrete, and riprap, among others. Although many sand and gravel sites exist throughout the County, most of the extraction sites are located in and along the Santa Clara River bed. Other minerals of commercial value in Ventura County are asphalt, clay, expansible shale, gypsum, limestone, and phosphate. The project site is not in Ventura County's designated Mineral Resource Zone (MRZ) (Ventura County, 2010). The project would require the import of mineral resources such as gravel, rock, and concrete materials to the project site; however, due to the availability of such resources in the region, this would not result in an adverse impact associated with the loss of availability of mineral resources. No impact would occur.

NO IMPACT

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

There are no mineral mining or recovery sites on or directly accessible from the project site, and improvement of the trailhead parking area would not affect access to or availability of a mineral resource recovery site. No impact would occur.

NO IMPACT

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12 Noise

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project result in any of the following impacts?				
a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies	☐	☐	☐	■
b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels	☐	☐	☐	■
c. A substantial permanent increase in ambient noise levels above those existing prior to implementation of the project	☐	☐	■	☐
d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above those existing prior to implementation of the project	☐	☐	■	☐
e. For a project located in an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels	☐	☐	☐	■
f. For a project near a private airstrip, would it expose people residing or working in the project area to excessive noise	☐	☐	☐	■

a. Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Noise associated with the proposed project would occur during the one-month construction period and would be limited to the use of vehicles and equipment required to implement the proposed grading and ground cover activities, as well as the placement of perimeter fencing around the site. There are no residences or other sensitive receptors on or adjacent to the project site, and construction noise would not affect sensitive receptors in excess of any applicable standards.

For traffic-related noise, impacts are considered significant if project-generated traffic results in exposure of sensitive receptors to an unacceptable increase in noise levels. The project may result in

increased use of the trailhead parking area and the Pothole Trailhead (in its current or relocated location, at the discretion of the Forest Service), potentially resulting in increased passenger vehicle traffic to and from the parking area. This would occur on an existing roadway and would not expose sensitive receptors to new noise or types of noise. Therefore, no impact would occur.

NO IMPACT

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

Project construction would generate short-term groundborne vibration and noise associated with the use of construction vehicles and equipment to complete the proposed grading and groundcover activities. However, there are no sensitive receptors in the project area, and potential vibration-related effects would be temporary and of short duration, limited to the one-month construction period. Therefore, no impact would occur.

NO IMPACT

c. Would the project result in a substantial permanent increase in ambient noise levels above levels existing without the project?

The proposed project site is accessible to the public, but recreationists have access only by walking approximately three miles along Piru Canyon Road from the parking area at the Juan Fernandez Launch Ramp Facility. Under the proposed project, use of the site would likely increase due to the availability of vehicular access along Piru Canyon Road, as well as parking at the proposed project site. However, it is anticipated that increased usage would be comprised of local recreationists already utilizing facilities and recreational opportunities in the area. Therefore, there would not be a substantial permanent increase in ambient noise level above current levels and impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

d. Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Project construction would temporarily increase noise levels due to the use of vehicles and equipment on-site. Due to the short duration of construction activities, and the absence of sensitive receptors in the area, potential impacts associated with temporarily increased noise levels would be less than significant.

During project operations, use of the site would likely increase due to improved access and parking; this would result in periodic increases in noise associated with passenger vehicles and the presence of recreationists. However, the site is currently accessed by recreationists, and increased usage would therefore not result in significant impacts associated with periodic increases in ambient noise levels. Therefore, potential impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

The nearest airport to the proposed project is located approximately 20.4 miles to the southwest. The proposed project is not in an airport land use plan. Therefore, no impact would occur.

NO IMPACT

f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise?

There is no private air strip in or adjacent to the proposed project. As mentioned, the nearest airport is located approximately 20.4 miles to the southwest of the project site. Therefore, no impact would occur.

NO IMPACT

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13 Population and Housing

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

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

The proposed project would not introduce new homes or businesses and would not extend roads or other infrastructure. The improved trailhead parking area may result in increased visitation to the site, but visitors would be comprised of recreationists already visiting the area. No new permanent employees would be introduced, as existing United employees would provide project maintenance services. No impact to population and housing would occur.

NO IMPACT

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

The project site is located in unincorporated Ventura County near the community of Piru and is currently undeveloped. Although visitation to the site may increase as a result of the project, access would occur on an existing roadway that is currently utilized by recreationists and would have no effect on existing housing. No impact would occur.

NO IMPACT

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

The project would not displace existing people or necessitate the construction of replacement housing. Although the potential for increased visitation would occur, access would be provided on an existing roadway and would have no effect associated with housing availability or access.

NO IMPACT

14 Public Service

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

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

a.1 Fire protection

The project site is located near the community of Piru, in unincorporated Ventura County. Fire protection to this area is provided by the Ventura County Fire Department. Fire Station No. 28 is approximately 11.8 miles southwest of the project site, located at 513 Church Street in Piru. This station would continue to serve the project site and area. The project would likely result in increased visitation to the site due to improved access and parking opportunities; signage would be provided regarding fire regulations such that the potential for fire hazards to occur due to increased visitation would be avoided. However, increased use at the project site resulting from improved access and parking may potentially require additional emergency responses to the area. The local fire departments have sufficient staff and vehicles to accommodate such responses, and the project would not result in the need for new or physically altered facilities for fire protection. No impact would occur.

NO IMPACT

a.2. Police protection

Police protection to the project area is provided by the Ventura County Sherriff's Department. The Santa Clara Valley Station, located at 524 Sespe Avenue in the community of Fillmore, serves the community of Piru and the project area. The project may result in increased visitation to the project site due to improved parking and access, and it is possible that increased visitation may also increase unwanted activities such as littering and vandalism. It is understood that local property owners are concerned about opening Piru Canyon Road beyond the Juan Fernandez Launch Ramp Facility due to the potential for increased trespassing and vandalism, with particular concern over trespassing hunters.

As part of regular project operations, the project site would be visited and monitored by existing United personnel (or designees), which would discourage unlawful activities such as trespassing, littering, and vandalism. Regarding the potential for trespassing hunters, this is an existing issue in the project area, and regular monitoring of the project site and access road that would occur as part of the project design would ensure that such activities would not increase or be encouraged because of the project. As noted, United personnel (or designees) will patrol the area on a regular and frequent basis; any signs of trespassing, vandalism, or other unlawful activities will be reported to the local law enforcement authorities.

LESS THAN SIGNIFICANT IMPACT

a.3. Schools

The project would improve recreational access in the area but would not result in population increases such that new or modified school facilities would be required. The project would have no effect on school service ratios, response times, or other performance objective. No impact would occur.

NO IMPACT

a.4. Parks

The proposed project would implement improvements to an existing recreational area. The trails that would be accessed from the project's proposed parking area improvements are currently used by hikers and equestrians on a regular basis. Although the project may increase use of local trails due to improved access and parking opportunities, it would not require new or altered governmental facilities, and would not result in significant impacts to parks. Potential impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

a.5. Other public facilities

The project consists of the improvement of a trailhead parking area and would be maintained by existing United staff or designee. Construction of the project would not result in substantial adverse physical impacts to schools, parks, or other public facilities in the region, and would not require new or physically altered facilities. Impacts to other public facilities (e.g., sewer, storm drains, and roadways) are discussed in Sections 16, *Transportation/Traffic*, and Section 17, *Utilities and Public Services*.

NO IMPACT

15 Recreation

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

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

The proposed project would develop a previously disturbed site to provide parking and easier access for the Forest Service Pothole Trail (No. 18W04). The project may increase visitation to this trailhead due to improved access and parking; however, regular monitoring and maintenance of the trailhead parking area would occur as part of the project, and therefore the site would not experience deterioration as a result of project implementation. Pothole Trail (No. 18W04) enters the Sespe Wilderness Area in the southern part of the Los Padres National Forest. Local trails may also see increased use because of project implementation. However, such use is expected to be comprised of recreationists already visiting the area and would not result in or accelerate substantial physical deterioration of the trails or parking lot area. Potential impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

The proposed project includes the improvement of a previously disturbed site which provides access to existing wilderness trails. Project implementation would result in temporary construction-related impacts associated with ground disturbance and the use of vehicles and equipment on-site; however, the implementation of project design features described in Section 9 would minimize or avoid potentially adverse impacts. During project operations, visitation to the site may increase but regular monitoring and maintenance included as part of the project design would deter potentially adverse impacts. Therefore, the proposed trailhead improvements would not result in significant adverse effects on the environment. Potential impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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16 Transportation

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project result in any of the following impacts?				
a. Conflict with an applicable plan, ordinance or policy establishing a measure of effectiveness for the performance of the circulation system, taking into account all modes of transportation, including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways, and freeways, pedestrian and bicycle paths, and mass transit?	☐	☐	☐	■
b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☐	☐	☐	■
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐	■
d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?	☐	■	☐	☐
e. Result in inadequate emergency access?	☐	☐	☐	■
f. Conflict with adopted policies, plans, or programs regarding public transit, bikeways, or pedestrian facilities, or otherwise substantially decrease the performance or safety of such facilities?	☐	☐	☐	■

a. Would the project conflict with an applicable plan, ordinance or policy establishing a measure of effectiveness for the performance of the circulation system, taking into account all modes of transportation, including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways, and freeways, pedestrian and bicycle paths, and mass transit?

The proposed project would not conflict with any applicable plans, ordinances, or policies that establish a measure of effectives for the performance of the circulation system. Access to the project site would occur on an existing roadway (Piru Canyon Road) which is currently used for access to the site. No impact would occur.

NO IMPACT

b. Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

The proposed project would not conflict with any congestion management programs. Under the proposed project, use of the site would likely increase due to improved access and parking. However, it is anticipated that increased usage would be comprised of local recreationists already utilizing local recreational opportunities in the area. Therefore, the proposed project would not have an impact.

NO IMPACT

c. Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

As discussed in Section 8, *Hazards and Hazardous Materials*, and Section 12, *Noise*, the nearest airport to the proposed project is located approximately 20.4 miles to the southwest. The project would not impact air traffic patterns by either increasing traffic levels or by changing the location of the airport. No impact would occur.

NO IMPACT

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

The project does not include any design features or incompatible uses that would substantially increase hazards or incompatible uses. Access to the project site is via Piru Canyon Road, which is operated and maintained by the Forest Service. This road is characterized by sharp turns and current disrepair in the form of broken asphalt and potholes; the proposed project does not include repair or maintenance of this road (which is the responsibility of the Forest Service). The project would not introduce new sharp curves or dangerous intersections and would repair and improve the existing access/spur road leading to the proposed parking area from Piru Canyon Road.

Visitation to the site may increase due to improved access and parking opportunities, which would increase the use of Piru Canyon Road by passenger vehicles and trucks with horse trailers. In addition, the transportation of construction vehicles and equipment to the project site, as well as the transportation of construction-related water supplies, would temporarily increase use of Piru Canyon Road. As previously described, signage would be provided regarding road conditions (Mitigation Measure HAZ-1, *Provide Signage Regarding Road Conditions*) to minimize the potential for hazards associated with transportation on local roadways. The project would not introduce

incompatible uses, as passenger vehicles and trucks with horse trailers presently utilize roadways within the Lake Piru Recreation Area. Potential impacts would be less than significant with mitigation incorporated.

POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED

e. Would the project result in inadequate emergency access?

Overall, the proposed project would increase access for emergency vehicles to the site by improving the access/spur road to the site, and by improving access through existing gates on Piru Canyon Road. The project does not include improvements to Piru Canyon Road, which is operated and maintained by the Forest Service, but also would not introduce conditions which would affect existing emergency access to the site. There are currently locked gates on Piru Canyon Road (one gate at Reasoner Canyon, and one gate just north of the Juan Fernandez Launch Ramp Facility); as previously discussed, these gates would be removed (or locked open in place) as part of the proposed project. The project would not result in inadequate emergency access, and no impact would occur.

NO IMPACT

f. Conflict with adopted policies, plans, or programs regarding public transit, bikeways, or pedestrian facilities, or otherwise substantially decrease the performance or safety of such facilities?

The proposed project would not conflict with or substantially decrease the performance or safety of any adopted policies, plans or programs regarding public transit, bikeways, or pedestrian facilities. As described above, implementation of the project would result in overall improved access. No impact would occur.

NO IMPACT

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17 Utilities and Service Systems

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project result in any of the following impacts?				
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board	☐	☐	☐	■
b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects	☐	☐	☐	■
c. Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects	☐	☐	☐	■
d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed	☐	☐	☐	■
e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments	☐	☐	☐	■
f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs	☐	☐	☐	■
g. Comply with federal, state, and local statutes and regulations related to solid waste	☐	☐	☐	■

a. Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

The proposed project does not include the discharge of wastewater on site and would therefore not exceed wastewater treatment requirements of the Los Angeles Regional Water Quality Control Board (RWQCB). Waste from the proposed restroom facility would be removed and transported to

an approved facility for disposal. No water service would be provided to the site. No impact would occur.

NO IMPACT

b. Would the project require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

The proposed project will not discharge any wastewater on-site, and waste from the restroom facility will be collected and trucked to an approved disposal facility with sufficient capacity to accommodate project-related waste. The project would not require new water or wastewater treatment facilities or expansion of existing facilities. No impact would occur.

NO IMPACT

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

As described above, the project includes restroom facilities that would be regularly cleaned out, with waste transported to and disposed of at an approved local facility with sufficient capacity to accommodate project-related waste. Therefore, no impact would occur with respect to wastewater treatment capacity.

NO IMPACT

d. Would the project require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

As discussed in Section 9, *Hydrology and Water Quality*, the project includes drainage improvements and the implementation of BMPs to ensure that runoff from the parking area surface would not result in substantial adverse effects associated with stormwater. Natural drainage patterns on the project site would be restored and maintained to the maximum extent practicable. No new or expanded stormwater drainage facilities would be required to accommodate the project. No impact would occur.

NO IMPACT

e. Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

As discussed in Section 9, *Hydrology and Water Quality*, the proposed project will not have any water facilities on-site and water will only be used during the construction phase and infrequently for maintenance of the restroom facility. Any water used will be brought from local sources during construction and maintenance. Potential impacts associated with use of Piru Canyon Road to deliver water to the site are addressed in Section 16, *Transportation*. The project does not require existing entitlements and resources or new and expanded entitlements; therefore, no impact to water supplies or entitlements would occur.

NO IMPACT

f. Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

The nearest landfill to the project site is the Toland Landfill, which is located approximately 26.3 miles southwest of the project site and has a life expectancy of approximately 25 years at the present waste generation rate and therefore has sufficient capacity to serve the project. Implementation of the project would not require demolition activities that would generate waste needing to be disposed of at a landfill facility. Operation and maintenance of the project would include the emptying of on-site trash receptacles, and transport/disposal of this waste to the Toland Landfill. There are currently no trash receptacles on the project site; however, visitors to the site would be comprised of local recreationists who currently access trails in the area. The project is therefore not expected to result in an increase of regional trash production, and there is sufficient landfill capacity available to serve the project. No impact would occur.

NO IMPACT

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

As discussed above, operation and maintenance of the project would include trash collection and disposal (at a local landfill) but would not introduce a substantial new source of solid waste. Cleaning out of the restroom facility would occur in compliance will regulations applicable to waste collection and disposal. The project would therefore comply with federal, state and local statues and regulations related to solid waste. No impact would occur.

NO IMPACT

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18 Mandatory Findings of Significance

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
a. Does the project have the potential to substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self- sustaining levels, eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	■	☐	☐
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☐	☐	■
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	■	☐

a. Does the project have the potential to substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self- sustaining levels, eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

As discussed in Section 4, *Biological Resources*, the proposed project would not result in significant unavoidable impacts to biological resources, including to habitat of fish or wildlife species. Mitigation Measure BIO-1, *Special-Status Wildlife and Nesting Bird Preconstruction Clearance Surveys*, would ensure the avoidance of adverse impacts. In addition, the proposed project would not eliminate important examples of the major periods of California history or prehistory because no examples are known to exist at the site. Mitigation Measures CR-1a and CR-1b, *Procedures for Discovery of Intact Cultural Resources* and *Procedures for Discovery of Human Remains*, would ensure that should previously unknown resources be found at the site the significance of these

would be assessed and impacts mitigated. Impacts would be less than significant with mitigation incorporated.

POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED

b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

As described in the environmental issue area analyses, the project would have no impact, a less than significant impact, or a less than significant impact after mitigation with respect to all environmental issue areas. The project would not conflict with the current Ventura County General Plan or land use pattern in the project site and vicinity. There are no other planned or pending projects in the immediate vicinity of the project site that would create cumulative impacts. Therefore, the project's contribution to any cumulative impacts would not be cumulatively considerable. No impact would occur.

NO IMPACT

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

The proposed project has been found in this Initial Study to have no impacts to human health. Construction noise and vibration would occur during the construction period and may be experienced by local residents and recreationists. In addition, increased traffic on Piru Canyon Road may occur as a result of increased access and parking opportunities. Informational signage provided as part of the project, as well as regular monitoring and maintenance activities, would ensure that implementation of the project would be consistent with current conditions of the site and surrounding area. Potential impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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