Appendix A -- No. 16

PROPONENT'S ENVIRONMENTAL ASSESSMENT
ENVIRONMENTAL CHECKLIST

Site name: *Moorpark ILA*

Prepared for
California Public Utilities Commission

Prepared by
Level 3 Communications, LLC

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ENVIRONMENTAL CHECKLIST

1. Facility Title:
Level 3 Long-Haul Network, Moorpark ILA

2. Lead Agency Name and Address:
California Public Utilities Commission
Van Ness Avenue, San Francisco, CA 94102
(415) 703-2782

3. Contact Person and Phone Number:
Bill Vander Lyn, Level 3 Communications, LLC
6689 Owens Drive, Suite A, Pleasanton, CA 94588
(925) 398-3040

4. Facility Location:
The project site is located at 5245 Kazuko Court , near the intersection of Kazuko Court and Tejeda Street in the City of Moorpark, Ventura County, California. The site is approximately 0.60 acre in size and is developed with an approximately 15,000 square foot concrete tilt-up industrial building. It contains a paved parking area along the northern edge and landscaping at the front entrance (east) along Kazuko Court. Access to the site is on either side of the building (north or south) via paved access drives which run along the north and south property lines. (See Figure 1, Regional Map; Figure 2, Vicinity Map; Figure 3, Parcel Map; Figure 4, U.S.G.S. Quad Map; Figure 5, Surrounding Land Use Map; and Figure 6, Photo Key Map and referenced photos).

5. Proponent's Name and Address:
Level 3 Communications, LLC ("Level 3")
1450 Infinite Drive, Louisville, CO 80027
(303) 926-3000

6. General Plan Designation: Light Industrial (I-1)

7. Zoning: Industrial Park (M-1)

8. Description of Facility:
This checklist evaluates the design, construction, and operation of the Moorpark ILA. This facility, which will support the Long-Haul network, will be located outside a utility corridor.

The Moorpark In-Line Amplification Facility (ILA) will be constructed within an existing building located on a developed 0.60 acre site at 5245 Kazuko Court. An existing building encompasses approximately 15,000 square feet of the parcel and will require demolition of finished office space. The existing shell will remain intact with the new electronics installed within. A separate generator structure will be constructed at the northwest corner of the project site utilizing an engineered portion of the existing concrete pad.

An ILA station is required to receive signals and amplify the light power that comes into it before transmitting the signal along the fiber optic cable. Signal amplification capabilities are required approximately every 60 miles or less along the network.

The proposed ILA station will be engineered for the utilization of the available building space. No prefabricated ILA huts will be used at this location.

One 300-kilowatt, 449-horsepower (hp) diesel-powered generator will provide emergency power. The separate pre-cast concrete generator housing or shelter will be approximately 12 feet wide, 24 feet long (288 square feet), and 10 feet high. It will arrive prefabricated and will be installed on an improved concrete foundation. Insulation will be provided as needed for noise abatement. The generator will be mounted on a 1,000-gallon, double-walled, aboveground storage tank that is 13 feet long by 8 feet wide by 1 foot 9 inches high. The tank system design incorporates a high fuel alarm (local) and a tank rupture alarm (remote).

No additional buildings will be constructed. Control and maintenance functions will occur within the proposed facilities. Parking space and a driveway providing access from Kazuko Court exists to support site maintenance activities.

The Moorpark ILA will require electricity and telephone. Utility lines supporting these capabilities are present. Normal electrical power will be provided, consisting of 400-amp, 480-volt, three-phase service. No water or sewer hookups are required because the site will be unmanned. Site grading is not anticipated nor will there be any net change in impervious surfaces. Thus, no changes in storm water drainage characteristics are anticipated. Fire protection equipment will be installed per local codes.

Figure 7 is a conceptual plot plan of the Moorpark ILA site showing required setbacks and locations of utility and vehicle access. The area bounded by the setbacks is the "development window" within which the present building is situated. The precise location of the ILA interior electronics will be determined during the engineering design phase of the project.

There will be no site development including no grading for placement of the generator shelter or for access and parking. Upgrading of the generator foundation will be engineered and completed prior to delivery of prefabricated components (i.e., shelter placement), placement of the fiber optic cable line, and installation of utility connections. Erection of any additional perimeter fencing will occur prior to all improvements. The fiber optic cable feed to the ILA will be from the railroad ROW located approximately 2,700 linear feet from the building via roadways. The running line will enter the building from the railroad ROW south of the property utilizing Maureen Lane, Hertz Road, and Bonsai Street. The connection to the ILA facility will be installed at a depth of approximately 42 inches either by plowing in the conduit (which does not require a trench) or by digging a trench, laying the conduit, and back-filling.

The finished offices within the building will be demolished. Demolition debris from the building and some additional concrete removed for pad upgrade will require disposal. The estimated volume of demolition debris is 272 cubic yards. During construction, no offsite areas will be required for mobilization or parking of construction or worker vehicles.

During operation at 100-percent load, the 449-hp generator consumes approximately 22 gallons of diesel fuel per hour (gph). At 75 percent load, fuel consumption rate is 16.5 gph. During most of the 30 minutes of testing and maintenance run time each week, the generators will run at 50-percent load. However, for the purpose of this "worst-case" calculation, Level 3 assumes a 75-percent load and 30 hours of run time each year (i.e., 1/2-hour/week times 52 weeks, plus four hours contingency). Therefore, 30 hours per year multiplied by 16.5 gph equals 495 gallons of diesel fuel consumption per year for testing and maintenance. The double-walled storage tank on which the engine/generator set is mounted is designed to support the weight of the engine/generator set and this mounting is a common design for emergency engine/generators. For engine/generator sets that are operated more frequently, the fuel tank is mounted separate from the engine/generator since greater fuel storage capability is required and the storage tank would be too large to be located beneath the engine/generator (Rice, 1999). Testing of the emergency generator will be controlled remotely, and will not be part of site maintenance activities.

Level 3 will equip each generator with a spill tray beneath the filling port and a spill emergency response kit. The kit will consist of a 55-gallon drum containing oil-absorbing booms and pads, tarps, duct tape, and shovels. These materials will be placed near the filling port for immediate access should a release occur. A laminated placard listing the number of an emergency response contractor and appropriate spill-reporting procedures will be contained in the drum and will also be displayed near the filling port. Should a release occur that Level 3 personnel could not manage, the emergency response contractor will be called.

In line with its commitment to environmental compliance, Level 3 will train technical staff regarding safety and spill-response procedures that should be implemented during diesel fuel deliveries. These written procedures will define the necessary steps for use and disposal of spill containment equipment located at the site. A Level 3 technician will accompany any third party contractor delivering fuel. Because the facilities are kept locked, the Level 3 technician will unlock/lock the security gate during ingress and egress. The technician will advise the contractor as to the location of the filling port for the fuel tank, describe the site safety requirements, observe the fueling process, and listen for the high fuel alarm. Should a release occur, the Level 3 technician will immediately initiate containment and cleanup procedures.

The ILA site will not be permanently staffed. The site will be visited approximately once a week for routine maintenance, data downloading, and fuel tank filling (assumed for analysis purposes to be 60 trips per year).

Current and potential cumulative projects in the vicinity of the proposed Moorpark ILA site are provided in Table 1. Criteria for inclusion of a project in Table 1 are as follows:

- Projects are within two miles of the site. In some cases these projects are in more than one jurisdiction.
- Projects are scheduled for construction from one year before to one year after the "construction window" for the Level 3 facilities, or between March 1999 to March 2003.
- Current projects include those which have been approved by the lead agency and have had their environmental document signed, approved, and/or certified.
- Potential projects are those that have been formally submitted to the lead agency and which are defined well enough to discern where they are, what they are (type of land use), and how big they are (acres, dwelling units, square footage, etc.). Although these submitted, but not approved projects are considered "speculative" under CEQA, they give an indication of potential future development around the project site.

9. Surrounding Land Uses and Environmental Setting:

All surrounding land uses are industrial in nature (See Figure 5, Surrounding Land Use Map).

10. Other Agencies Whose Approval is Required:

The site is located within the jurisdiction of the City of Moorpark. It is also located within the Ventura County Air Pollution Control District (VCAPCD).

The project is located in the M-1 zoning district. Public Utility Facilities and Communications Facilities are permitted in the M-1 zone subject to a Planning Commission approved Conditional Use Permit.

Specific local policies relevant to each of the sixteen environmental impact issue areas are provided in Table 2. When there are no relevant and applicable policies, this fact is stated with an explanation. Sources for the policies are provided at the end of the listing.

PROPONENT'S DETERMINATION

On the basis of this initial assessment, the proposed facility would not have a significant effect on the environment because the Environmental Commitments described below would be incorporated into the design and construction of the facility. A Negative Declaration would apply to this facility.

Environmental Commitments
The proposed facility is an element of the project addressed in an Application for Modification of an existing Certificate of Public Convenience and Necessity (CPCN) (Decision No. 98-03-066). That CPCN was supported by a Mitigated Negative Declaration that included mitigation measures to be implemented in the design, construction, and operation of the previously approved telecommunications facilities within existing utility rights-of-way. Level 3 has incorporated all mitigation measures outlined in the previous Decision into its design of the project addressed in this Proponent's Environmental Assessment (PEA). Therefore, the actions previously imposed as mitigation measures in the CPCN Decision are now Environmental Commitments for the facility addressed herein. In summary, these Environmental Commitments include:

- Measures to mitigate potential impacts to various resources;
- Commitment to obtain all required local, regional, state and federal approvals and permits required for construction and operation of the project;
- Coordination with local and resource management agencies;
- Notifications of adjacent property owners;
- Coordination with other utility projects in the area; and
- Documentation and reporting of compliance.

A complete list of mitigation measures from the previous Negative Declaration is provided in Appendix B of the PEA.

Mitigation Measures
No Mitigation Measures are recommended for the Moorpark ILA site. All potential impacts can be avoided or reduced to less-than-significant levels through implementation of Level 3's Environmental Commitments.

ENVIRONMENTAL IMPACTS

I. AESTHETICS

Setting

The project site is a developed industrial site containing a concrete tilt-up industrial building. The building covers the majority of the site; the area surrounding the building is paved. A small landscaped area is located at the front (east edge) of the site along Kazuko Court.

The project site fronts on Kazuko Court. Access driveways run along the north and south boundaries of the site from Kazuko Court to Bonsai Avenue.

The project is located in a developed industrial area. Surrounding development is industrial in nature and similar in character to the project site. The project site is visible from Kazuko Court directly in front of the site. The site is visible approaching the site from the south from the corner of Kazuko Court and Tejeda Street, and visible approaching the site from the north from the end of the Kazuko Court cul-de-sac. The site is not visible from any other roadways due to surrounding industrial development. Kazuko Court is not designated as a State or Local Scenic Highway. There are no designated scenic viewsheds or scenic resources in the vicinity of the project.

Because the project involves the reuse of an existing industrial building, no local policies for visual resources or community appearance apply.

Evaluation

a)	Would the project have a substantial adverse effect on a scenic vista?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The project site is located on a developed parcel in a developed industrial area. There are no scenic vistas in the project area.

b)	Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The project site is not visible from a state scenic highway. There are no scenic resources on the site or within the surrounding area.

c)	Would the project substantially degrade the existing visual character or quality of the site and its surroundings?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The proposed project involves the reuse of an existing building for an ILA station. No changes to the visual character of the site or the surrounding area are proposed.

d)	Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The proposed project involves the reuse of an existing building for an ILA station. No new sources of light or glare are proposed.

II. AGRICULTURAL RESOURCES

Setting

The project site is located in an urbanized area, characterized by industrial development. The site is presently developed with an approximately 15,000 square foot industrial building. The site is not currently in agricultural use, nor has it been used for agriculture recently. The site is not located on Prime Farmland (Moorpark General Plan, 1987), nor is it under a Williamson Act contract. The City of Moorpark General Plan states that all Prime Farmlands within the city limits have been previously committed to urban use. The project area does not contain prime soils. Soils in the project area are classified as very poor, Classes VI-VII (Moorpark General Plan, 1987). There are no local policies for agricultural resources which apply to the project site.

Evaluation

a)	Would the project convert Prime Farmland, Unique Farmland, or 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?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The project site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, therefore the proposed use would not convert such farmland to non-agricultural use.

b)	Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The project site is not zoned for agricultural use. The site is located in an industrial park zoning district, as designated by the City of Moorpark. The project site is not covered by a Williamson Act contract.

c)	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?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The project site is located in an urbanized area on a developed industrial site. Development of the ILA site would not result in growth-inducing effects or other off-site changes to the environment that would result in the conversion of Farmland to non-agricultural use.

III. AIR QUALITY

Throughout California, the fiber optic cable line will be installed along existing utility corridors in support of the Long Haul network. In the City of Moorpark, an ILA station will be constructed outside an existing utility corridor. To minimize potential environmental impacts, the ILA facility will be constructed within an existing building at a previously developed site. The ILA facility is the subject of this air quality checklist analysis.

The ILA facility will tie into the fiber optic line along the ROW. The connection to the ILA facility will be installed via direct boring which will extend approximately 1,316 feet to tie into the line running along the railroad ROW.

Setting

The Moorpark ILA site will involve development of a permanent, aboveground facility occupying approximately 0.60 acre. Project activities include limited site preparation to construct a generator pad outside the building, construction of the ILA pads within the building and installation of equipment, automated testing of the emergency generators, and approximately weekly vehicular trips to the site for maintenance and data logging. Site development will not be required as this site will have the equipment installed within an existing building (except for the emergency generator) and utilize existing parking.

Table 3 provides relevant information on construction and operation activities contributing to emissions of pollutants from the Moorpark ILA facility. Additional technical information used in the air quality analysis is provided in Attachment A. Included in Table 3 are the following construction-related items:

- Estimate of one-way commuting distance (miles) that members of the construction crew will travel to the construction site and numbers of such trips.
- Equipment (e.g., graders, excavators, and water trucks) that will be used at the construction site. Included are the size (in gross horsepower (hp)) and number of units of each type of equipment, and the numbers of hours per day and days that each piece of equipment will operate.
- Material delivery vehicles (e.g., cement trucks) are represented in terms of number of trips per day, total number of trips, and number of one-way miles traveled.
- The amount of material (soil) that will be disturbed during trenching operations on the proposed site for installation of the fiber optic line between the property line and the building.

The maximum distance between the Moorpark site and the ROW over which the fiber optic cable will be trenched (estimated as the distance from the ROW to the far side of the site parcel) is approximately 1,316 feet.

A key assumption implicit in the estimation of fugitive dust and emissions construction equipment is that only one piece of equipment will operate at any one time. Off-site emissions due to workers commuting to and from the site, equipment delivery, and other on-road vehicles will occur simultaneously (e.g., during the same day) with emissions from on-site construction equipment. Therefore, maximum daily emissions are determined by the summation of emissions from the highest emitting piece of construction equipment and on-road emissions that occur on the same day as that piece of construction equipment is operating.

Operational parameters specified in Table 3 include specification of the 300 kw size of the emergency standby generator, the approximately 30-minute duration of its weekly test, and parameters for the weekly vehicular trip to the ILA site associated with site maintenance and data logging. Normal operation will generate at most one vehicle trip to and from the site on a weekly basis (conservatively estimated as 60 trips/year, relating to approximately 30 hours of run time for emissions estimation). The testing of the emergency generator will be triggered automatically. Operating equipment at the site will be powered by electricity from the utility power grid.

Table 3 shows the emission factors and other parameters used to calculate exhaust and fugitive PM_{10} emissions for mobile equipment (U.S. Environmental Protection Agency, 1996). Construction and operation emission thresholds for NO_x, ROC, PM_{10}, SO_x, and CO are listed in Table 3, as provided by the Ventura County APCD. This agency is responsible for management of air emissions in Ventura County where the Moorpark ILA site resides. In addition to the Moorpark ILA, one other PEA facility (Ventura ILA site) is located in Ventura County and is under the jurisdiction of the Ventura County APCD.

Ventura County is within the South Central Coast Air Basin which is currently designated as a nonattainment area for state and national one-hour average ozone standards and for state and national particulate matter ("PM_{10}") standards (California EPA, 1998). Ventura County is also located within a sub-region of the air basin that is designated as a nonattainment area for the national one hour ozone standard. With respect to the national ozone standard, Ventura County has been further classified as a "severe-15" nonattainment area which means that the area is allowed 15 years from the enactment of the federal Clean Air Act Amendments of 1990 to reach attainment. There are a number of industrial establishments located adjacent to and within 80 feet of the site (Figure 8). The distance of the closest sensitive receptor to the boundary of the site is 273 feet.

Based on monitoring data collected within Ventura County during the three-year period of 1995-1997, maximum ozone concentrations exceeded the National Ambient Air Quality Standard for ozone (0.12 parts per million for one hour) on an average of 12 days per year. The same maximum concentrations exceeded the more stringent California Ambient Air Quality Standard (0.09 parts per million for one hour) on an average of approximately 68 days per year (California EPA, 1996 to 1998). The ozone problem in Ventura County is not uniform throughout Ventura County and occurs more frequently at inland locations in the southern portion of the county then along the coast or in the northern portion of the county. The ozone problem in Ventura County reflects emission sources within the South Central Coast Air Basin, but under certain meteorological conditions, the ozone problem is significantly affected by the transport of pollutants from the San Joaquin Valley Air Basin and South Coast Air Basin.

Ambient PM_{10} concentrations in Ventura County did not exceed the 24-hour-average National Ambient Air Quality Standard of 150 micrograms per cubic meter. However, the measured concentrations exceeded the more stringent 24-hour-average California Ambient Air Quality Standard of 50 micrograms per cubic meter roughly 10 percent of the time (California EPA, 1996 through 1998). The PM_{10} problem in Ventura County is primarily due to entrainment of dust from vehicle travel over paved and unpaved roads, construction activities, and farming operations as well as pollutant transport.

The Federal Clean Air Act and California Clean Air Act require plans to be developed for areas designated as nonattainment of the national and state ozone standards, including strategies for attaining the standards. The applicable ozone air quality plan is the 1997 *Air Quality Management Plan Revision* (Ventura County Air Pollution Control District [VCAPCD], 1998).

The applicable PM_{10} air quality plan is the Federal PM_{10} Attainment Demonstration Plan.

As part of the ozone and PM_{10} attainment strategies under the applicable federal and state air quality plans, VCAPCD recommends that construction phase impacts should be based on consideration of control measures to be implemented (VCAPDC 1989). VCAPCD also recommends use of significance criteria of 25 pounds per day of ROC's or NO_x to evaluate emissions from individual development projects (VCAPCD 1989). ROC and NO_x are precursor emissions for regional ozone and PM_{10} formation.

The overall stationary source control program that is embodied in VCAPCD's *Rules and Regulations* has been developed such that new stationary sources can be allowed to operate in Ventura County without obstructing the goals of the air quality plan. To accomplish this objective, many new stationary sources must undergo New Source Review during the permitting process, install Best Available Control Technology ("BACT"), and provide offsets. However, some new stationary sources have been deemed too minor to require New Source Review, BACT, or offsets, and VCAPCD allows for some of these sources to be exempt

from the normal permitting process. VCAPCD Rule 23 (Exemptions from Permit) lists the specific types of emissions sources that are eligible for exemption. Sources eligible for exemption under Rule 23 include emergency internal combustion engines operated either during an emergency or during maintenance of the engine. Engine maintenance is limited to 50 hours per calendar year per engine. Another type of emission source eligible for exemption under Rule 23 is diesel storage tanks.

While VCAPDC Rule 23 exempts certain emission sources from normal permitting requirements and New Source Review, it does not exempt the source from meeting all other applicable requirements under VCAPCD's *Rules and Regulations.* One such requirement is VCAPCD Rule 64 (Sulfur Content of Fuels), which limits the sulfur content of liquid fuel to no more than 0.5 percent by weight. Another VCAPCD requirement, Rule 74.9, specifies emission limits for stationary reciprocating internal combustion engines, but it includes an exemption for emergency standby engines operated either during an emergency or maintenance operation (maintenance operations are limited to 50 hours per calendar year).

General Conformity requirements (40 CFR Part 93; July 1998) do not apply to this project since it does not involve a federal action such as the use of federal land or the need to acquire a federal permit for the site.

Evaluation

a)	Would the project conflict with or obstruct implementation of the applicable air quality plan?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☒	No Impact ☐

Site construction parameters affecting emissions from mobile sources and the emergency generator, and the resulting emissions are estimated in Table 3. These resulting emissions are well-within regulatory thresholds (discussed further in Section III(b) below). These emissions are, therefore, in compliance with the applicable air quality plan.

Fugitive dust will not be generated in a significant amount during the construction phase (Table 3) from grading activities and travel of heavy equipment over temporary roads at the construction site as this site will utilize an existing building and the associated paved access roads. The only expected construction activity at this site is the preparation of a 300 square foot area for the emergency generator enclosure. Fugitive dust generation will vary from day to day depending on the level and type of activity (e.g., trenching activities, grading, and vehicular traffic bringing materials to the site), the silt content of the soil (during trenching and grading activities), and the weather. Fugitive dust will be controlled in a manner consistent with the applicable air quality plans by implementing effective dust control measures throughout the construction phase. Long-term fugitive dust emissions associated with facility operation will be negligible. The project will include use of a paved road onsite to provide access directly to the buildings and equipment.

Generator testing and the visiting technician vehicle will contribute operational air emissions as shown in Table 3. The generator will be constructed and operated in a manner consistent with existing air quality plans. Under VCAPCD Rule 23, no VCAPCD permit would be required for either the proposed standby generator or the above ground storage tank (Stratton, 1999). However, to continue to qualify for this exemption, operation of the standby generator would be limited to no more than 50 hours per year calendar year for maintenance purposes, and is subject to documentation requirements.

Normal operations will generate approximately one vehicle trip to and from the site each week. The project will generate so little traffic on a long-term basis that none of the measures included in the Carbon Monoxide Maintenance Plan will apply.

Site-Specific Environmental Commitments: Level 3 will take the following actions to implement Environmental Commitments in the CPCN Decision:

- Submit a letter to VCAPCD prior to project construction indicating that an emergency standby engine will be located at the project site and that an exemption from permitting requirements is sought under Rule 23 based on an annual usage rate of no more than 50 hours per calendar year for maintenance purposes;
- Use of the standby engine for emergency, non-utility electrical power generation purposes only (or for related testing and maintenance purposes) and maintain required documentation to support continued eligibility for Rule 23 exemption status;
- Use diesel fuel with a sulfur content not to exceed 0.05 percent by weight; and
- Implement a construction emissions abatement program to minimize emissions of fugitive dust (including PM_{10}) and ozone precursors.

As described under III(b) below, Level 3 will comply with requirements in the permit exemption for the emergency standby generators and will also implement fugitive dust control measures to control PM_{10} emissions during construction work.

b)	Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☒	No Impact ☐

As discussed above, the Moorpark ILA site lies in an area designated as nonattainment of the National and California Ambient Air Quality Standards for ozone and PM_{10}.

For evaluating construction-phase impacts under CEQA, VCAPCD recommends that significance should be based on a consideration of the control measures to be implemented (VCAPDC, 1989). VCAPCD also provides recommendations for evaluating operational-phase impact of projects. VCAPCD recommends use of significance criteria of 25 pounds per day of ROC or NO_x to evaluate emissions from individual development projects (VCAPCD, 1989).

The ILA site would be a permanent building facility occupying approximately 0.60 acres. Site development would be limited to installation of the standby generator in a new enclosure and installation of the ILA equipment inside of an existing building. The access road/parking already exists and is paved. Construction activities will require up to two months to complete**.** Construction of the project would generate fugitive dust (including PM_{10} but also larger-diameter particulate), and other criteria air pollutants from exhaust emissions basically limited to trenching and grading activities and material delivery (such as cement) by truck. Air quality impacts from fugitive dust emissions during construction will be temporary and intermittent.

Estimates of construction-related engine emissions are shown in Table 3. Fugitive dust emissions during site construction activities are also shown in Table 3. There are no numerical thresholds for fugitive dust (PM_{10}) from construction activities.

Over the long-term, the project would result in emissions from operation of both stationary and mobile sources (Table 3). However, mobile source emissions would be negligible because the site would be unmanned and routine motor vehicle activity would result only from weekly site visits to check on the computers, download information, and test-run the emergency generator. Stationary source emissions would result from operation of the emergency diesel-powered standby engine during weekly routine testing and during unforeseen emergency electricity loss. ROC emissions from the aboveground diesel storage tank would be negligible.

Routine maintenance tests of the standby engine would be approximately one half hour. Emissions on a given day when the engine would undergo such a test are shown in Table 3. Neither estimate approaches

the VCAPCD-recommended significance threshold for operational-phase impacts. These emissions estimates were made using published emission factors for diesel industrial engines (U.S. EPA, 1996).

Site-Specific Environmental Commitments: The Proponent will take the following actions to implement Environmental Commitments in the CPCN Decision to ensure air quality impacts will be less than significant. At all times during construction, fugitive dust emissions will be controlled using the following procedures:

- On-site vehicle speed will be limited to 15 miles per hour;
- Use of petroleum-based dust palliatives, if necessary**,** will meet the road oil requirements of VCAPCD Rule 74.4 (Cutback Asphalt); and
- Streets adjacent to the project site will be swept as needed to remove dirt, which may have accumulated from construction activities so as to prevent excessive amounts of dust.

At all times, ozone precursor (i.e., ROC and NO_x) emissions from construction equipment will be controlled using the following procedures:

- Equipment engines will be maintained in good condition and properly tuned as per manufacturer's specifications; and
- During the smog season (May through October), the construction period will be lengthened so as to minimize the number of vehicles and equipment operating at the same time.

During grading and trenching operations, excessive fugitive dust emissions will be controlled by regular watering, or other dust preventative measures using the following procedures:

- All material excavated will be sufficiently watered to prevent excessive amounts of dust. Watering will occur at least twice daily with complete coverage, preferably in the late morning and after work is done for the day;
- All material transported off-site will be either sufficiently watered or securely covered to prevent excessive amounts of dust;
- Face masks will be used by all employees involved in grading and trenching operations during dry periods to reduce inhalation of dust. Dust may contain the fungus that causes San Joaquin Valley Fever; and
- The area disturbed by grading and trenching operations will be minimized so as to prevent excessive amounts of dust.

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 and state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☒	No Impact ☐

The Moorpark ILA site is one of two PEA sites in Ventura County under the jurisdiction of the VCAPCD (the other being the Ventura ILA site). Potential total construction emissions from both sites were analyzed for the possibility of simultaneous construction. Because limited construction grading and excavation activities are required, the emissions at each site during construction are minimal as shown in Table 4. The same thresholds apply to assessment of total project emissions as were used to evaluate emissions from individual project sites (Table 4).

Simultaneous construction at two sites would exceed the daily numerical threshold for NO_x (Table 4), and therefore, construction at these sites will not occur concurrently.

Because project construction, except for trenching activities and grading to prepare the emergency generator enclosure, will take place within existing buildings, surrounding uses will be buffered from the effects of project construction (see Figure 7 for the "conceptual plot plan"). This buffer will help minimize the possibility that the project will cause a cumulatively significant short-term PM_{10} impact from simultaneous and unrelated construction projects taking place within the same general area, which is dominated by industrial use.

Total project emissions from testing and maintaining the emergency generators at the PEA sites in Ventura County are exempt from offset requirements because the emissions from each generator are exempt. Emissions that are exempt from regulatory requirements are considered to have impacts that are less than significant.

The project's incremental contribution to the cumulative effect of additional emissions sources on the regional ozone and PM_{10} concentrations will not be cumulatively considerable because ozone impacts are the result of the cumulative emissions from numerous sources in the region and transport from outside the region. All but the largest individual sources emit ROCs and NO_x in amounts too small to make a measurable effect on ambient ozone concentrations.

Site Specific Environmental Commitments: Construction will be limited to one site in Ventura County per day to avoid exceeding the daily limit of NO_x.

d)	Would the project expose sensitive receptors to substantial pollutant concentrations?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

Sensitive receptors are defined as facilities that house children, elderly, and ill members of the population, such as schools, day-care centers, hospitals, retirement homes, hospices, and residences. The nearest neighbors to the ILA site are a number of industrial establishments located adjacent to the site (Figure 8), but which do not qualify as sensitive receptors. The distance of the closest sensitive receptor to the site is approximately 300 feet.

Project construction except for trenching and limited grading activities will take place primarily within an existing building; therefore, receptors associated with surrounding uses would be buffered from the effects of project construction (see Figure 7 for the "conceptual plot plan"). This buffer, along with the low levels of construction emissions, would prevent substantial pollutant concentrations from reaching sensitive receptors. Through application of fugitive dust control measures described above, these emissions will be kept below a level of significance.

During construction, site access will be easy and direct. Construction vehicles will not block traffic on Kazuko Court, Tejeda Street, or other streets in the area for any significant period of time. Thus, emissions from idling vehicles in the vicinity of the sensitive receptors will be minimal.

The emergency generator will produce operation emissions during testing and power outages. Two factors prevent these emissions from significantly affecting sensitive receptors. First, the generator will not be located in close proximity to sensitive receptors due to the establishment of buffer zones where development will be excluded (see Figure 7 for the "conceptual plot plan"). Second, generator usage will be restricted to approximately 30 minutes per week. These measures will assure that sensitive receptors are not exposed to substantial pollutant concentrations.

e)	Would the project create objectionable odors affecting a substantial number of people?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The only potential odor that may be associated with site construction activities at the Moorpark ILA Site will be diesel engine exhaust. The low level of construction activity would not produce enough exhaust to affect the offsite public, which is limited to the few employees in the surrounding industrial facilities. Similarly, testing of the emergency generator at the ILA site for no more than one-half hour per week will not produce sufficient exhaust or odor to be objectionable to a substantial number of people.

IV. BIOLOGICAL RESOURCES

Setting

The conditions for supporting biological resources are poor both onsite and in the vicinity. The vegetation present onsite is limited to ornamental non-native species. The site itself is a concrete commercial structure and is located within completely developed commercial setting. The perimeter and surrounding areas are paved with the exception of the landscaped sites. The roof of the building is flat with no decent habitat (for nesting or foraging) for raptor species. The landscaped trees located onsite may be suitable for raptor perching, however no foraging habitat occurs in the immediate vicinity. No wildlife species were observed during the survey. Plant species observed during the field survey were gingko tree (*Gingko biloba*), fesque (*Festuca* sp.), and pine tree (*Pinus* sp.).

Evaluation

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 Game or U.S. Fish and Wildlife Service?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The site consists of a concrete building located within a completely developed urban setting. No habitat exists onsite for 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 Game or U.S. Fish and Wildlife Service (the site exhibits poor habitat for nesting or foraging raptor species). It is highly unlikely that the site is utilized by any species mentioned above, therefore the project is not expected to result in any impacts to such species. A list of sensitive species that could potentially occur on the present site was created based upon a California Natural Diversity Database Search for the Moorpark Quadrangle (California Department of Fish and Game, September, 1999) and knowledge of the project area. Table 5 includes these species and their potential for occurrence onsite.

b)	Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The site consists of a concrete building located within a completely developed urban setting. No evidence of riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service was observed. The site and the immediate surroundings are paved and developed. No impact to above mentioned habitats and communities will result from the proposed project.

c)	Would the project 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?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The site consists of a concrete building located within a completely developed urban setting. No evidence of federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) was observed onsite. The site and the immediate surroundings are paved and developed. No impact to such wetland communities will result from the proposed project.

d)	Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The site and the immediate surroundings are paved and developed. Because the site is void of natural habitat and highly unlikely to support native species, it is not expected to serve as any component of a migratory wildlife corridor or native wildlife nursery. Therefore, the proposed project is not expected to interfere with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

e)	Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The City of Moorpark Tree Ordinance covers all trees within the city. Any tree taller than 4 inches requires a permit to be removed. The County of Ventura has a tree ordinance that covers oaks and sycamores. Trees of any species which are 30 inches or more in diameter are also protected under the ordinance. No trees are expected to be removed as a result of the proposed project, therefore the project is expected to have no conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

f)	Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

Neither the City of Moorpark nor the County of Ventura has an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Due to the absence of applicable local and regional conservation plans, and the urban setting in which the project site is located, the project is not expected to conflict with any conservation plan mentioned above.

V. CULTURAL RESOURCES

Setting

The project site is located in the Little Simi Valley in the coastal foothills of Ventura County. The property is in the City of Moorpark between Los Angeles Avenue and the Union Pacific Railroad. A recently built commercial/warehouse structure occupies about 15,000 square feet of this 0.60 acre site and the rest of the parcel is paved.

King (1981) has divided the prehistory of the Santa Barbara Channel region into three periods: Early (8000 to 3350 B.P.), Middle (3350 to 800 B.P.), and Late (800 to 150 B.P.). King's chronology is based on stylistic changes in beads and ornaments from burial assemblages. The artifact types which indicate temporal affiliation are seldom found in quantity outside of cemeteries, limiting the usefulness of the chronology for dating components at other kinds of sites. However, the chronology can be tied to absolute dates through radiocarbon dating. Dates for the beginning and end of each of King's periods are based on radiocarbon dates from burial assemblages (King, 1981).

King's Early Period (8000 to 3350 B.P.) has been divided into three phases – X, Y, and Z – with a gap in time between Phases X and Y. Preceding the peak of a warm, dry climatic period known as the Altithermal, Phase X is characterized by the use of large flake and core tools, millingstones, and handstones. Millingstones indicate the grinding of hard seeds, probably gathered from sage (*Salvia*) plants. Mortars and pestles, which indicate the pounding of acorns, were not widely used until the onset of Phase Y, after the peak of the Altithermal (Glassow, Wilcoxon, and Erlandson, 1988:8). Evidence for the pursuit of sea mammals also appears during Phase Y. This broadening of diet is likely related to a population increase associated with the easing of Altithermal conditions (Glassow, Wilcoxon, and Erlandson, 1988). Evidence useful for reconstructing settlement patterns during the Early Period is extremely limited. Based on these limited data, King (1981) suggests that Phase X sites along the Santa Barbara Channel were located on the crests of hills away from the ocean, while Phase Y sites were often situated on knolls adjacent to sloughs. During Phase Z, King notes that sites again occur on higher ground. All Early Period sites investigated appear to be base camps, although temporary camps also likely existed.

During the Middle Period (3350 to 800 B.P.) increasing sedentism and increasing emphasis on marine subsistence along the Santa Barbara Channel is reflected by the appearance of coastal villages occupied during a large part of the year. Circular shell fishhooks supplement the bone gorges and compound fishhooks which came into use during the Early Period (Tartaglia, 1976). The plank canoe, which made ocean fishing and travel to the Channel Islands safer and more efficient, came into use about 1500 B.P. (Arnold, 1987:7). Use of the plank canoe also promoted trade and exchange between the mainland and the Channel Islands. Terrestrial hunting is indicated by use of contracting stemmed and corner-notched dart points (used with spear throwers). Increasing status differentiation is reflected by differences in amounts of beads and other ornaments associated with burials (Martz, 1987).

The full development of Chumash culture, one of the most socially and economically complex hunting and gathering groups in North America (Arnold, 1987:4), occurred during the Late Period (800 to 150 B.P. or approximately A.D. 1150 to 1800). Along the Santa Barbara Channel and on the Channel Islands there were a series of permanent or semi-permanent villages with populations of 200 to 600 or more individuals (Grant, 1978b). The principal economic pursuits were marine fishing and trading. Status differentiation had developed to the point where village chiefs inherited their rank and probably controlled trade and redistribution.

When the Spanish arrived in A.D. 1769 the Chumash occupied the coast from Malibu Canyon to San Luis Obispo and inland as far as the western edge of the San Joaquin Valley (Grant, 1978a). The Chumash were divided into several language or dialect groups that corresponded with territory around the missions founded by the Spanish. From south to north along the coast, there were the Ventureño around San Buenaventura Mission (now in Ventura), the Barbareño around Santa Barbara Mission, the Purisimeño around La Purísima Concepción Mission (near Lompoc), and the Obispeño around San Luis Obispo Mission. These missions were founded between 1772 and 1788. The Cuyama, Emigdiano, and Castac were inland Chumash who lived where no missions were founded. The northern Channel Islands were also inhabited by Chumash.

Evaluation

a)	Would the project cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The protocols contained in Level 3's *Long Haul Fiber Optics Project Cultural Resources Procedures* (Parsons Brinckerhoff Network Services, 1999), requiring records searches and field survey, where appropriate, were followed as summarized below. A technical report, providing more information on the results of the records search and field surveys has been prepared (Mason, 1999b).

Level 3 archaeologists requested a records search for the proposed Moorpark ILA site, and the lands within a one mile radius, from the South Central Coastal Information Center at UCLA's Institute of Archaeology, Los Angeles. The search had two objectives: (1) to determine whether previous archaeological investigations have been conducted in the project area, and (2) to provide information on known historic sites or culturally sensitive areas on and in the vicinity of the proposed ILA Facility. The records search was conducted by Information Center staff who also checked the OHP Historic Property Data File for Ventura County, which includes the National Register of Historic Places (listings and eligibility determinations), California Points of Historical Interest, and California Historical Landmarks.

In addition, the Level 3 Team sent a letter dated September 3, 1999 to the Native American Heritage Commission (NAHC) requesting a search of the NAHC Sacred Lands file and identification of a contact person or persons within NAHC for follow-on contact/consultation (Mason, 1999a). The response, dated September 17, 1999, indicated that the NAHC search revealed no site-specific information on Sacred Lands (McNulty, 1999). The letter cautioned that absence of information did not necessarily indicate the absence of cultural resources. A list of Native American contacts that might serve as sources of additional information was also provided. Level 3 has followed up on this response from NAHC by sending letters to NAHC-identified Native American contacts residing in Ventura County, notifying them of the Level 3 project activities, and requesting information they might have on sacred lands. Any response indicating the possible presence of Sacred Lands will be followed up with a detailed, site-specific evaluation utilizing the expertise of the relevant Native American contacts. The results of this effort are fully documented, as appropriate, in the supporting technical report (Mason, 1999b).

The results of the records search (File No. 8030a) showed that the property had been previously surveyed for historic resources. There are no previously recorded historical resources within a one-mile radius of the proposed ILA site (California Historical Resources Information System, South Central Coastal Center, 1999).

The building is an obviously modern commercial warehouse structure (built in 1988, see Photos A-C) and has no historical associations. The structure on the project parcel is not eligible for the California Register of Historical Resources. It is not associated with significant historic events or important persons, does not have distinctive architectural characteristics, nor does it have the potential to yield information important in history. In addition, the structure is less than 50 years old.

b)	Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The records search from the South Central Coastal Information Center was conducted by Information Center staff who also checked the OHP Historic Property Data File for Ventura County, which includes the National Register of Historic Places (listings and eligibility determinations), California Points of Historical Interest, and California Historical Landmarks. The results showed that the property had been previously surveyed for archaeological resources. There are no previously recorded archaeological sites within a one-mile radius of the proposed ILA site (California Historical Resources Information System, South Central Coastal Center, 1999). There is no exposed ground surface on the parcel where a field survey could be undertaken. The ILA facility will be installed inside the existing building.

c)	Would the project directly or indirectly destroy a unique paleontological resource or site or unique geological feature?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☒	No Impact ☐

As mapped by Dibblee (1992), the project site is underlain by Quaternary age and younger alluvium (unit Qa). No fossil site is recorded in the archives of the Natural History Museum of Los Angeles County Vertebrate Paleontology Section or the University of California Museum of Paleontology as occurring in this rock unit at the project site or elsewhere in the Moorpark 7.5-minute quadrangle. Moreover, no fossil vertebrate site is reported as occurring in this rock unit in the immediate project site vicinity by Jefferson (1991a, 1991b). Although there is a potential for late Pleistocene and early Holocene continental vertebrate and land plant fossil remains occurring in the subsurface at the project site, it is unlikely construction-related earth moving would extend to a depth sufficient to encounter remains old enough to be considered fossilized.

Site Specific Commitments: If earth moving extends to a depth greater than 5 feet below current grade, construction-related earth moving will be monitored by a qualified vertebrate paleontologist or a qualified paleontologic construction monitor to allow for the recovery of larger fossil remains. Rock samples would be processed to allow for the recovery of smaller fossil remains. All recovered fossil remains would be fully treated (prepared, identified by knowledgeable paleontologists, curated, catalogued) and, along with associated specimen data and corresponding geologic and geographic site data, placed in a recognized museum repository. The paleontologist would prepare a final report of findings that includes an inventory of recovered fossil remains. These measures would be in compliance with Society of Vertebrate Paleontology (1995, 1996) guidelines for management of paleontologic resources and for the museum acceptance of a monitoring program fossil collection.

d)	Would the project disturb any human remains, including those interred outside of formal cemeteries?	Potentially Significant Impact ☐	Less than Significant With Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The records search and field survey provided no evidence of the presence of human remains site (California Historical Resources Information System, South Central Coastal Center, 1999). If suspected human remains are encountered during construction, operations will stop until the proper official will be notified, the find evaluated, any mitigation recommendations implemented, and Level 3 has been cleared to resume construction in the area of the find. The procedures to be followed are described in detail in Level 3's *Long-Haul Fiber Optics Project Cultural Resources Procedures* (Parsons Brinckerhoff Network Services, 1999:25-39) and are approved by the CPUC.

VI. GEOLOGY AND SOILS

Setting

The project site lies in a relatively flat area in the City of Moorpark. Moorpark is located in a geologically active area, with several active faults in the vicinity. The project site vicinity is not located within an Alquist-Priolo zone, or landslide or subsidence geologic hazard area (CDMG, 1973, 1999). The project site is located in an area susceptible to liquefaction, has moderate erosion activity and its soils are highly expansive.

Evaluation

a)	Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: i) Rupture of 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? Refer to Mines and Geology Special Publication 42. ii) Strong seismic-related groundshaking? iii) Seismic-related ground failure, including liquefaction? iv) Landslides?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The project site is not located within an Alquist-Priolo zone or landslide geologic hazard area (CDMG, 1973, 1999). However, the project site is located in a seismically active area. The area can experience moderate magnitude groundshaking from nearby active fault systems (i.e., faults exhibiting displacement within the last 11,000 years) (CDMG, 1994). The major active faults in the vicinity of the project site are the Oak Ridge, San Cayetano, San Fernando, and San Andreas faults (CDMG, 1994). The Oak Ridge fault is closest to the site at approximately 6 miles (Blake, 1998). These faults can produce a maximum earthquake magnitude of approximately 6.9, 6.8, 6.7, and 6.8, respectively (CDMG, 1996). A 10% probability of peak ground accelerations of >70% g in 50 years is expected in the site vicinity (CDMG, 1996). As part of the Proponent's environmental commitment, any potential seismic hazard would be minimized by compliance with the California seismic code standards and applicable local building and seismic codes. As a result of this commitment and because the facility will not be permanently staffed, the project would not expose people or structures to substantial adverse effects attributable to these potential geologic hazards. Therefore, no impacts would occur.

b)	Would the project result in substantial soil erosion or the loss of topsoil?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The site is nearly flat, and is located in an area of moderate erosion activity (CDMG, 1973). The existing building at the site would be used to house the terminal facility while much of the remaining area is paved. Therefore, substantial soil erosion or loss of topsoil would not occur as a result of the project.

c).	Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The site is relatively flat, and the geologic units and soils on the site are not unstable. The existing building at the site would be used to house the ILA facility. Therefore, the minimal plowing or trenching from the

street to the existing building for the fiber optic cable would not result in on- or off-site landslides, lateral spreading, subsidence, liquefaction, or collapse.

d)	Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The area in which the site is located has highly expansive soils (CDMG, 1973). As part of the Proponent's environmental commitment to this project, the Proponent would minimize any potential impacts associated with these soils through compliance with structural and design regulations (i.e., compliance with the Uniform Building Code, and all local design, construction, and safety standards). Because of the Proponent's environmental commitment and because the facility will not be permanently staffed, no substantial risk to life or property would be created. Therefore, no impacts would occur.

e)	Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

Municipal sewer connections at the site would be used for the disposal of wastewater. Therefore, there will be no need for septic tanks or other alternative wastewater disposal systems at the site. Therefore, no impacts would occur.

VII. HAZARDS AND HAZARDOUS MATERIALS

Setting

No indications of potential hazardous materials or storage were found in database searches (Vista Information Solutions, *California Site Assessment,* 1999) and during a site visit. There are no schools within the vicinity of the site. There are no airports in the vicinity of the site and the site is not located within any airport safety zone.

Evaluation

a)	Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The 1,000-gallon, double-walled above-ground storage tank containing diesel fuel would be located on site to supply an emergency generator. This tank would comply with all federal, state, and local regulations for fuel storage, including overfill protection, vapor emissions, containment, and notification. Fuel deliveries would comply with spill protection and off-loading regulations. Waste generated by equipment maintenance would be disposed of off-site in accordance with all applicable regulations. The generator and storage tank would be located inside an equipment enclosure within a fenced compound that will be locked to provide security.

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?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

Hazardous materials (diesel fuel) would be stored in an above-ground storage tank, with monitoring, alarm, and leak containment features. The tank would provide hazard containment against reasonably foreseeable upset and accidents. The tank would be located inside an equipment enclosure within a fenced compound that will be locked to provide security.

c)	Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

No existing school or proposed school is located within one-quarter mile of the site.

d)	Would the project be located on a site which is included on a list of hazardous materials 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?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The project would not be located on a site included on a list of hazardous materials sites (Vista Information Solutions, *California Site Assessment,* 1999).

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?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The site is not located within an airport land use plan or within two miles of a public airport or public use airport.

f)	For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The site is not located within the vicinity of a private airstrip.

g)	Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

Development of this site would not alter emergency response or emergency evacuation routes. Roadways would not be blocked either during construction or operation.

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?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The proposed structure would be located in an urbanized area zoned Industrial Park (M-1). The structure is not located in the vicinity of any wildland areas. Generators would be equipped with spark arrestors to further reduce the potential for loss, injury, or death involving fires.

VIII. HYDROLOGY AND WATER QUALITY

Setting

The project site is not located in a 100-year floodplain (Vista Information Systems, NEPA Checklist, 1999), nor in an area that would be subject to inundation as a result of dam failure, tsunami, seiche, or mudslide (Moorpark General Plan, Safety Element, vol. 1, 1987).

The Moorpark ILA site includes a 15,000 square foot building surrounded by paved parking area. Construction will not increase impervious surface area. Therefore, no modification of stormwater drainage is anticipated. However, any stormwater drainage measures that may be included in the ILA facility will be installed in accordance with applicable Ventura County codes.

Site-Specific Environmental Commitments: The following actions will be taken to ensure that hydrology/water quality impacts are minimized during construction and operation of the Moorpark site.

As appropriate, Level 3 will implement the following measures to avoid and minimize effects on any nearby aquatic environments. Appendix E identifies the documents and practices in which these measures will be specified.

- Bore under sensitive habitats when practicable;
- Implement erosion control measures during construction;
- Remove cover vegetation as close to the time of construction as practicable;
- Confine construction equipment and associated activities to the construction corridor;
- No refueling of construction equipment will take place within 100 feet of an aquatic environment;
- Comply with state, federal, and local permits;
- Perform proper sediment control;
- Prepare and implement a spill prevention and response plan;
- Remove all installation debris, construction spoils, and miscellaneous litter for proper offsite disposal; and
- Complete post-construction vegetation monitoring and supplemental revegetation where needed.

A Notification of Intent (NOI) will be submitted to the applicable RWQCB and the State Water Resources Control Board for construction of the Moorpark site under the *General Storm Water Permit to Discharge Storm Water Associated With Construction Activity*. A Storm Water Pollution Prevention Plan (SWPPP) will be prepared and will include the following: 1) Project Description; 2) Best Management Practices (BMPs) for Storm Water Pollution Prevention; 3) Inspection, Maintenance, and Record Keeping; and 4) Training.

Although the area of disturbed ground on the Moorpark site will be less than five acres, and will therefore be less than the minimum size requirement for a SWPPP, the cumulative area of the total ILA, 3R, Terminal, and Distribution Node sites associated with this project is greater than five acres. Accordingly, an NOI will be submitted, and a SWPPP will be prepared.

Evaluation

a)	Would the project violate any water quality standards or waste discharge requirements?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The proposal would not discharge substances that could contaminate water. Hazardous materials (diesel fuel) would be stored in a 1,000-gallon, double-walled, above-ground storage tank, with monitoring and leak containment features. The tank would provide hazard containment against reasonably foreseeable upset and accidents. Wastes generated by equipment maintenance would be disposed of off-site in accordance with all applicable regulations.

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 of the local groundwater table (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The project will not extract groundwater, therefore, groundwater supplies will not be depleted, nor will the project interfere with groundwater recharge.

c)	Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The project would not alter the existing drainage pattern of the site or area because ILA electronics will be placed inside an existing building.

d)	Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The project would not alter the existing drainage pattern of the site or area because it will be placed inside an existing building.

e)	Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The project would not create or contribute runoff water because the facility will be placed inside an existing building. Existing site drainage will not be altered.

f)	Would the project otherwise substantially degrade water quality?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

No impacts to water quality are expected as a result of this project. Because the facility will be placed in an existing building within a developed commercial area, the project would not produce contaminated runoff, generate wastewater, nor discharge substances that could contaminate water.

g)	Would the project place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The project would not include housing. The project is not located within a 100-year floodplain (Vista Information Solutions, FEMA floodplain map, NEPA Checklist, 1999).

h)	Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The project is not located within a 100-year floodplain (Vista Information Solutions, FEMA floodplain map, NEPA Checklist, 1999).

i)	Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The project is not located within a 100-year floodplain but is located within a 500-year floodplain (Vista Information Solutions, FEMA floodplain map, NEPA Checklist, 1999). Installation of the ILA would not expose people to a significant risk because the site would not be occupied.

j)	Would the project expose people or structures to a significant risk of loss, injury or death due to inundation by seiche, tsunami, or mudflow?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The site is not located within an area subject to inundation by seiche or tsunami. The site is not located in a an area subject to inundation by dam failure or in an area subject to landslide/mudslide hazards (Moorpark General Plan, Safety Element, Vol. I, 1987).

IX. LAND USE PLANNING

Setting

The City of Moorpark General Plan land use designation for the project site is Light Industrial (I-1). This designation provides for a variety of industrial uses, including light industrial service, technical research, and business office use. The surrounding properties are also designated for light industrial use.

The zoning designation for the project site is Industrial Park (M-1). The purpose of this zone is to provide suitable areas for development of light industrial, service, technical research, and related business office uses, in conjunction with strict standards for building design, noise, landscaping, and performance.

The project site is developed with a recent industrial building which conforms to all of the standards of the current City of Moorpark Zoning Ordinance.

Public Utility Facilities and Communications Facilities are permitted in the M-1 zone subject to a Planning Commission approved Conditional Use Permit. The project would be consistent with all provisions of the General Plan and Zoning Ordinance and would not require a general plan amendment or zone change.

Evaluation

a)	Would the project physically divide an established community?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The proposed project involves the reuse of an existing industrial building for an ILA facility. The project would not result in physical or visual division of an established community.

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?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☒	No Impact ☐

The City of Moorpark designates the project site for industrial use. The proposed project is permitted in the M-1 zoning district subject to a Planning Commission approved Conditional Use Permit. The project would not conflict with any applicable land use plans or regulations. However, a Conditional Use Permit would be approved at the discretion of the City of Moorpark Planning Commission and may include conditions determined appropriate by the City to reduce any City-identified conflicts related to the proposed project. Level 3 has committed to comply with any City-imposed Conditions of Approval. Because the proposed project involves the reuse of an existing developed industrial site for an unmanned ILA station, potential conflicts associated with the use would be minimal.

Development outside the existing building would be limited to placement of the emergency generator shelter. The City of Moorpark requires 10-foot setbacks from the property line in M-1 districts (Ochenbein, 2000). Because the generator would be located at least 15 feet from the property line, the location of the emergency standby generator would not conflict with local zoning or land use policies.

c)	Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

Neither the City of Moorpark nor the County of Ventura has an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Due to the absence of applicable local and regional conservation plans, and the urban setting in which the site is located, the project is not expected to conflict with any conservation plan mentioned above.

X. MINERAL RESOURCES

Setting

The project site is not in an area designated by the State or the City of Moorpark for known mineral resources (General Plan Open Space, Conservation, and Recreation Element). There are no local policies for mineral resources which apply to the proposed project or project site.

Evaluation

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?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The proposed project would be located within an existing building on a developed industrial site. No impacts to mineral resources of value to the region or the residents of the state would result.

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 other land use plan?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The proposed project would be located within an existing building on a developed industrial site. The site is not designated as having locally important mineral resources.

XI. NOISE

Setting

The Moorpark ILA Site is located in the City of Moorpark in Ventura County (Figure 2), approximately 2,700 feet from the ROW. A number of industrial establishments are located adjacent to the site (Figure 8). It is designated as "Industrial" (City of Moorpark) and is zoned as "Light Industrial District (I-L)". Based on observations of the field personnel, who performed the site investigation, the nearest receptors are industrial uses to the north and west (Figure 8). The closest residence to the ILA site is located approximately 300 feet away as indicated on Figure 8.

The site is not located close to an airport and is not within an airport land use plan. There are no private airports near the site. Estimates of daytime and nighttime ambient noise levels (60 dBA and 52 dBA, re-

spectively) were derived from Schomer and Associates (1991) as typical of sites designated as "moderate commercial and industrial areas."

The Moorpark ILA Site will involve development of a permanent, aboveground facility occupying approximately 0.60 acres. Project activities include limited site preparation to construct a generator pad outside the building, construction of the ILA pads within the building and installation of equipment, automated testing of the emergency generators, and approximately weekly vehicular trips to the site for maintenance and data logging. Site development will not be required as this site will have the equipment installed within an existing building and utilize existing parking.

Noise will be generated from both construction and operation of the ILA facility. Table 3 provides relevant information on construction and operation activities and equipment contributing to noise. Included is the size of each type of heavy construction equipment and the numbers of hours per day that each piece of equipment will operate. A key assumption implicit in the evaluation of noise impacts is that only one piece of heavy equipment will operate at any one time. Therefore, maximum construction noise levels at each site are based on the noisiest piece of construction equipment. This maximum potential noise (at full engine power) for normally-muffled diesel-powered construction equipment up to 200 horsepower (hp) measured at 50 feet is 84 dBA (U.S. EPA, 1971). Noise from off-site construction activities, associated with personnel vehicles and material delivery and refuse dump trucks, was not included because all vehicles will travel legally on local streets and state highways and will not remain stationary for a significant period of time to create a noise disturbance. As stated in Section III (Air Quality), site access is generally easy and direct, and traffic will not be blocked on local streets or highways for any significant period of time.

The City of Moorpark places no quantitative restrictions on construction noise levels between the hours of 7 am and 7 pm, Monday through Saturday (City of Moorpark Municipal Code, Section 17.53.100.E). Level 3 will restrict construction to these hours. Operational noise is subject to the limits imposed by City of Moorpark Municipal Code Section 17.53.080. For the zoning designation of the site and surrounding lands (Industrial Park), exterior noise levels may not exceed 65 dBA for any continuous noise source or 70 dBA for noises which occur for 30 minutes or less in any hour.

Operational parameters related to noise include the size/gross hp and period of operation (30 minutes/ week) of the emergency standby generator (Table 3). The generator will be automatically tested weekly. The maximum noise level at the property line of the closest receptor was estimated by adjusting the noise level to the distance from the generator as described in Attachment A. The generator will be located a minimum of 15 feet from the property line of all adjacent parcels. In addition, the generator will be enclosed in a noise-insulating shelter that reduces noise levels to 75 dBA at a distance of 5 feet from the shelter. This results in a noise level of 65 dBA at a distance of 15 feet from the generator. Detailed methodologies, algorithms, and assumptions associated with the noise analysis are provided as Attachment A.

Evaluation

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?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☒	No Impact ☐

Level 3 will comply with local construction-related noise ordinances by restricting construction activities to the period 7 am to 7 pm, Monday through Saturday. No numerical thresholds for construction-related noise or additional local noise standards apply during these time intervals. Because the facility will utilize existing and prefabricated structures, the construction period will be the brief up to two months as shown in Table 3.

The emergency generator will be the only source of operational noise at the facility. A noise-insulating shelter will be used to reduce noise levels to 75 dBA at 5 feet from the shelter. The shelter will be set back at least 15 feet from all property lines. The resulting noise level at the property line will be 65 dBA during generator operations, which complies with both the continuous and 30 minute per hour noise limits for Industrial Park-zoned property in Moorpark, as discussed above.

Site Specific Environmental Commitments:

- Level 3 will comply with local construction-related noise ordinances by restricting construction activities to the period 7 am to 7 pm;
- Level 3 will install a specially-insulated generator shelter to reduce noise levels to 75 dBA at 5 feet from the enclosure; and,
- Level 3 will install then generator at least 15 feet from the property lines of all noise receptors.

b)	Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☒	No Impact ☐

Neither project construction or project operations would generate excessive ground borne noise or vibration. The low level ground borne vibration and noise generated during construction will be short term in nature, and generally will not extend more than a few feet from the active work area. This work area will be set back 15 feet from all property lines as shown in Figure 7. Therefore, there will be a less than significant impact from ground borne vibrations or noise during construction.

For the operational period (approximately 30 minutes a week), the generator will cause only localized vibration intermittently. The generator is mounted on a concrete pad and will have a minimum of 4 vibration isolators. The buried fiber optic cable will not generate any perceptible vibrations or noise. Consequently, there will be no excessive ground borne vibration or noise impacts from site operations.

c)	Would the project result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

Construction noise will be temporary, lasting up to two months. Therefore, there will be no permanent increases in ambient noise levels in the vicinity of the site. Noise emitted during the approximately 30 minutes each week to test the generator, and during power outages, will be temporary and below the regulatory threshold.

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?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☒	No Impact ☐

Temporary increases in ambient noise levels will occur during the up to two months of construction but these will not be significant and will comply with the local construction noise ordinance. Weekly testing for a period of approximately 30 minutes and during power outages and for maintenance activities will generate operational noise. This intermittent noise will not be a substantial increase in ambient noise levels because the increased distance from the boundary with the nearest industrial facility will create a buffer area around the generator (Figure 7) and the location and enclosure of the generator will comply with noise regulations.

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 expose people residing or working in the project area to excessive noise levels?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The site is not located within an airport land use plan.

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 levels?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The site is not located within two miles of a private airstrip.

XII. POPULATION AND HOUSING

Setting

The project site is located in the City of Moorpark, with a population 29,324 (Ochsenbein, 1999). The project site is developed with one industrial building and is located in a developed industrial area. The nearest housing is located along Shasta Avenue, approximately 300 feet from the project site. There are no local policies for population and housing which apply to the project site.

Evaluation

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)?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The proposed project would not directly or indirectly induce population growth. The project would consist of the reuse of an existing industrial building. The project would be unmanned, and would not induce new employment. No new housing or extension of major infrastructure would result.

b)	Would the project displace substantial numbers of existing housing units, necessitating the construction of replacement housing elsewhere?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

No displacement of existing housing units would result from implementation of the proposed project. The project would involve the reuse of an existing industrial building as an unmanned ILA station.

c)	Would the project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The project would consist of the reuse of an existing industrial building and would not displace any people.

XIII. PUBLIC SERVICES

Setting

The project site is located in the City of Moorpark. Fire protection is provided by the Ventura County Fire Department and the Ventura County Sheriff's Department provides police protection. Public facilities in the vicinity of the project include Poindexter Park, located approximately one-quarter mile east of the project site near the corner of Liberty Bell Road and Poindexter Avenue, and Arroyo Vista Community Park, located approximately one-half mile south of the project site, east of Tierra Rejada Road. The City of Moorpark Public Library and City Hall are located approximately one-half mile north of the site at Moorpark Avenue and Charles Street. One elementary school, one middle school, and the Moorpark Metrolink Station are located within one mile east of the project site.

There are no local policies for public services which apply to the proposed project or project site.

Evaluation

a)	Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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 or the public services: Fire protection? Police protection? Schools? Parks? Other public facilities?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The proposed project involves the reuse of an existing industrial building in a developed industrial area. The proposed ILA facility would be unmanned and would be visited approximately weekly for maintenance. The project would not result in the need for new or physically altered government facilities nor affect response time or other performance objectives.

XIV. RECREATION

Setting

Several public parks are located within approximately one mile of the project site. The nearest parks are Poindexter Park, located approximately one-quarter mile east of the project site near the corner of Liberty Bell Road and Poindexter Avenue, and Arroyo Vista Community Park, located approximately one-half mile south of the project site, east of Tierra Rejada Road. The City of Moorpark Public Library is located approximately one-half mile north of the site at Moorpark Avenue and Charles Street.

Evaluation

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?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The proposed project involves the reuse of an existing industrial building for an unmanned ILA facility. The proposed project does not involve residential uses and would not cause an increase in the population of the City of Moorpark. No increase in the demand for, or use of, existing parks or recreational facilities would result from implementation of the proposed project.

b)	Would the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse effect on the environment?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The proposed project involves the reuse of an existing industrial building for an unmanned ILA facility. The proposed project would not include recreational facilities nor require the construction or expansion of recreational facilities which might have an adverse effect on the environment.

XV. TRANSPORTATION/TRAFFIC

Setting

Kazuko Court borders the project site on the east. The project site is connected to Bonsai Avenue via two paved access driveways which run east and west between Kazuko Court and Bonsai Avenue. Kazuko Court and Bonsai Avenue are not classified in the City of Moorpark General Plan Circulation Element.

Kazuko Court is a two-lane paved road with an approximately 50-foot ROW. The street is a cul-de-sac with curbs and gutters. No sidewalks, bus stops, or traffic control devices are located in the project vicinity.

Evaluation

a)	Would the project cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☒	No Impact ☐

During construction at the site, construction workers will be commuting to the site for approximately three months. The average number of commuting workers is expected to be seven. The workers will commute

during off-peak traffic hours (usually 6 a.m. and 3 p.m.) and park on the site. Occasionally, trucks will deliver equipment and materials to the site and haul construction debris from the site to recycling centers or landfills. These truck trips will be infrequent and off-peak from area traffic flows. The offsite impacts from construction are therefore expected to be less than significant. During operation of the site, one service person would visit the site approximately weekly. The project would therefore not result in a permanent increase in traffic load or daily trips because the project site would not be occupied on a daily basis.

b)	Would the project exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The proposed project is the reuse of an existing warehouse building as an unmanned ILA facility. One to two service personnel would visit the site approximately weekly for maintenance. The project would not result in a permanent increase in traffic load or daily trips because the project site would not be occupied on a daily basis.

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?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The project would not affect air traffic patterns.

d)	Would the project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The proposed project is the reuse of an existing warehouse building as an unmanned ILA facility. Access to the site would be via existing driveways. No changes to the site design are proposed, and the current design has no hazardous design features.

e)	Would the project result in inadequate emergency access?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The project would not affect emergency access routes.

f)	Would the project result in inadequate parking capacity?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The project site has a small off-street parking area along the north side of the building, and two paved access driveways which run east and west between Kazuko Court and Bonsai Avenue. The project will be

unmanned and visited by service personnel approximately weekly for maintenance. On-site parking capacity is adequate for the proposed use.

g)	Would the project conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The City of Moorpark General Plan Circulation Element contains the policies supporting alternative transportation. The following policies may apply to the proposed project:

- Policy 5.1: New development and redevelopment projects shall be required to include safe, separate, and convenient paths for bicycles and pedestrians so as to encourage these alternative forms of non-polluting transportation; and

- Policy 5.6: Bicycle racks shall be required and storage facilities shall be encouraged at new or modified public, commercial, and industrial building sites.

The proposed project will not conflict with the applicable policies for alternative transportation.

XVI. UTILITIES AND SERVICE SYSTEMS

Setting

The project site is developed within an industrial building and is located in a developed industrial area. All utilities and service systems are available on-site. The project would involve the reuse of the existing building as an unmanned ILA facility.

All utilities are underground in the project area. Manholes and utility access boxes are visible along Kazuko Court in front of the site.

Evaluation

a)	Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The proposed project would be unmanned and would be visited by one or two service personnel approximately weekly for maintenance. The existing building has restroom facilities which could be used by service personnel during site visits. The project site will not be occupied on a daily basis and would not generate a significant amount of wastewater. The project would not exceed wastewater treatment requirements of the applicable RWQCB.

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?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The proposed project would be unmanned and would be visited by one or two service personnel approximately weekly for maintenance. The existing building has restroom facilities which could be used by service personnel during site visits. The project site will not be occupied on a daily basis and would not generate a significant amount of wastewater. The project would not require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities.

c)	Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The project would involve the reuse of an existing industrial building on a developed industrial site. The project would not increase the burden on existing stormwater drainage facilities.

d)	Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The proposed project would be unmanned and would be visited by one or two service personnel approximately weekly for maintenance. The existing building has restroom facilities which could be used by service personnel during site visits. The project site will not be occupied on a daily basis and would not demand a significant amount of water. The project would have sufficient water supplies from existing resources.

e)	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?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The proposed project would be unmanned and would be visited by one or two service personnel approximately weekly for maintenance. The existing building has restroom facilities which could be used by service personnel during site visits. The project site will not be occupied on a daily basis and would not generate a significant amount of wastewater. The project would not affect the wastewater treatment provider's existing commitments.

f)	Would the project be served by a landfill with sufficient permitted capacity to accommodate the projects solid waste disposal needs?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☒	No Impact ☐

The project site is served by the Simi Valley Landfill and Recycling Center located in the City of Simi Valley and operated by the County of Ventura Environmental Health Division. The permitted daily capacity of the Simi Valley Landfill is 3,000 tons per day and the average daily intake is 2,276 tons per day. The project would involve the reuse of an existing industrial building as an unmanned ILA facility. The project would not generate solid waste on a daily basis. A small amount of construction-related solid waste (approximately 272 cubic yards or 180 tons) would result from the modification of the interior of the building.

g)	Would the project comply with federal, state, and local statutes and regulations related to solid waste?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The project will involve the reuse of an existing industrial building as an unmanned ILA facility. The project would not generate solid waste on a daily basis. A small amount of construction-related solid waste, 272 cubic yards (180 tons), may result from the modification of the interior of the building. The project would comply with federal, state, and local statues and regulations related to solid waste.

Analysis Team

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Sources

40 CFR Parts 93. *Determining Conformity of Federal Actions to State or Federal Implementation Plans* July 1998.

Arnold, J.E. Craft Specialization in the Prehistoric Channel Islands, California, *University of California Publications in Anthropology 18*, University of California Press, Berkeley and Los Angeles, 1987.

Austin-Foust Associates. *City of Moorpark General Plan: Circulation and Land Use Element,* May 13, 1992.

Barnes, J.D., Miller, L.N., Wood, E.W. Prediction of Noise from Power Plant Construction, Table B.2 June 1976.

Blake, T.F. . Preliminary fault data for EQFAULT and FRISKSP, 1998.

California Department of Fish and Game (CDFG). *Moorpark Quadrangle*, *California Natural Diversity Database*, September 1999.

California Division of Mines and Geology (CDMG). *Urban Geology, Master Plan for California,* Bulletin 198, 1973.

-----. *Fault Vicinity Map of California and Adjacent Areas*, Map No. 6, 1994.

-----. *Probabilistic Seismic Hazard Assessment for the State of California*, Open-File Report 96-08, 1996.

-----. *Fault-Rupture Hazard Zones in California*, Special Publication 42, 1999.

California Environmental Protection Agency (California EPA), Air Resources Board. *California Air Quality Data,* 1996-1998.

-----. *Proposed Amendments to the Designation Criteria and Amendments to the Area Designations for State Ambient Air Quality Standards,* and *Proposed Maps of the Area Designations for the State and National Ambient Air Quality Standards,* August 1998.

-----. *Emission Factor Computer Program*, 1998.

-----. *Reference Air Quality Database*, 1998 State Area Designations, Accessed at http://www.arb.ca.gov, Updated February 1999.

California Historical Resources Information System, South Central Coastal Center. *Expedited Records Search for 5245 Kazuko Court, Ventura County, California*, File No. 8030a*,* Chambers Group, Irvine, CA, September 7, 1999.

Caterpillar Corporation. Generator Emissions Guarantee, 1999.

Dibblee, T.W., Jr. *Geologic Map of the Moorpark Quadrangle, Ventura County, California*. Dibblee Geological Foundation Map #DF-40, 1992.

Glassow, M.A., L.R. Wilcoxon, and J. Erlandson. Cultural and Environmental Change During the Early Period of Santa Barbara Channel Prehistory, In: G. Bailey and J. Parkington (Editors), *The Archaeology of Prehistoric Coastlines*, pp. 64-77. Cambridge University Press, New York, 1988.

Grant, C. Chumash: Introduction, In: Robert F. Heizer (Editor), *Handbook of North American Indians, Volume 8, California*, pp. 505-508, Smithsonian Institution, Washington, 1978a.

-----. Eastern Coastal Chumash, In: Robert F. Heizer (Editor), *Handbook of North American Indians, Volume 8, California*, pp. 509-519, Smithsonian Institution, Washington, 1978b.

Integrated Waste Management Board. *Solid Waste Information System, California Waste Facilities, Sites, and Operations Database,* Accessed at http://www.ciwmb.ca.gov, Updated September 10,1999.

Jefferson, G.T. *A Catalogue of Late Quaternary Vertebrates from California: Part One, Nonmarine Lower Vertebrates and Avian Taxa*, Natural History Museum of Los Angeles County Technical Reports Number 5, 1991a.

-----. *A Catalogue of Late Quaternary Vertebrates from California: Part Two, Mammals,* Natural History Museum of Los Angeles County Technical Reports Number 7, 1991b.

King, C.D. *The Evolution of Chumash Society: A Comparative Study of Artifacts Used in System Maintenance in the Santa Barbara Channel Region Before A.D. 1804,* Ph.D. Dissertation, Department of Anthropology, University of California, Davis, 1981.

Martz, P. *Social Dimensions of Chumash Mortuary Patterns in the Santa Monica Mountains.* Paper presented at The Third California Indian Conference, Santa Barbara, California, 1987.

Mason, R.D., Chambers Group Inc. Written communication to Gail McNulty, Native American Heritage Commission, September 3, 1999a.

-----. *Cultural Resources and Paleontological Resources Literature Review Report for Level 3 Long Haul Fiber Optic Project: Moorpark ILA, in the City of Moorpark, Ventura County, California*. Prepared by Chambers Group, Inc., Irvine, CA, Prepared for Level 3 Project Office, Pleasanton, CA, November 1999b.

McNulty, G., Native American Heritage Commission. Written communication to David White, Level 3 Long Haul Project Team, September 17, 1999.

Moorpark, City of. *Moorpark General Plan*, 1987.

-----. *Zoning Ordinance*, 1998.

-----. *Municipal Code,* 17-53.070, 1999.

Ochsenbein, Jeremy, Planning Technician, City of Moorpark. Interviewed by Cheryl Kuta, Chambers Group Inc., August 31, 1999, September 8, 1999, and January 24, 2000.

Parsons Brinckerhoff Network Services (PBNS), *Level 3 Long Haul Fiber Optics Project: Cultural Resources Procedures,* July 1999.

Rice, Tim, Caterpillar Dealer. Interviewed by David Augustine, TRC, December 27, 1999.

Schomer and Associates. *Proposed Revisions to Property-Line-Noise-Source Measurement Procedures*, Report No. ILENR/RE-EA-91/10, June 1991.

Society of Vertebrate Paleontology. Assessment and Mitigation of Adverse Impacts to Nonrenewable Paleontologic Resources: Standard Guidelines, *Society of Vertebrate Paleontology News Bulletin* 163:22-27, 1995.

-----. Conditions of Receivership for Paleontologic Salvage Collections [Final Draft], *Society of Vertebrate Paleontology News Bulletin* 166:31-32, 1996.

South Coast Air Quality Management District (SCAQMD). *CEQA Handbook*, Table A9-8-B, 1993.

Stratton, Alicia, Air Quality Specialist, Ventura County Air Pollution Control District (VCAPCD). Interviewed by Mark Hagmann, ESA, May 3, 1999.

Tartaglia, L.J. *Prehistoric Maritime Adaptations in Southern California*. Ph.D. Dissertation, University of California, Los Angeles. University Microfilms, Ann Arbor, 1976.

United States Environmental Protection Agency (U.S. EPA). *Noise for Construction Equipment and Operations, Building Equipment, and Home Appliances*, Contract 68-04-0047, December 30, 1971.

-----. *Compilation of Air Pollutant Emission Factors, AP-42,* Section 3.3, Gasoline and Diesel Industrial Engines & Section 3.4, Large Stationary Diesel and All Stationary Dual-Fuel Engines, October 1996.

Ventura County Air Pollution Control District (VCAPDC), *Rules & Regulations*, 1989.

-----. *Ventura County Air Quality Plan Revision,* 1998.

Vista Information Solutions, Inc. *California Site Assessment Plus Report: Moorpark,* September 1, 1999.

-----. *NEPA Checklist: Moorpark,* FEMA Floodplain Maps, September 1999.

Tables

Figures

Photo Plates

Photo A East Face (Front) of Building from across Kazuko Court
Photo B North Face of Building
Photo C South Face of Building

Attachments

Attachment A Methodologies, Algorithms, and Assumptions Used in the Air and Noise Analysis.