Site 15. VENTURA ILA

Environmental Checklist

ENVIRONMENTAL CHECKLIST

1. Facility Title:
Level 3 Communications Infrastructure Project, Ventura 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:
Gary Finni, Level 3 Communications, LLC
6689 Owens Drive, Suite A, Pleasanton, CA 94588
(925) 398-3000

4. Facility Location:
The project site is located at 1667 Walter Street in the City of Ventura, County of Ventura, California. The project is located on a rectangular 1.01-acre site, developed with a two-story 15,346 square foot concrete tilt-up industrial building. The project site contains a paved parking area in the front (east side) along Walter Street, and a paved and fenced storage area in the rear (west side) along an access alley. The site has landscape areas surrounding the front parking lot, at the rear of the property along the alley, and between the building and its northern property line. A site vicinity map is provided as Figure 15-1. A site plot plan is provided as Figure 15-2. Additional maps and detail are provided in the PEA (PEA, 2000, following p. 15-42)

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

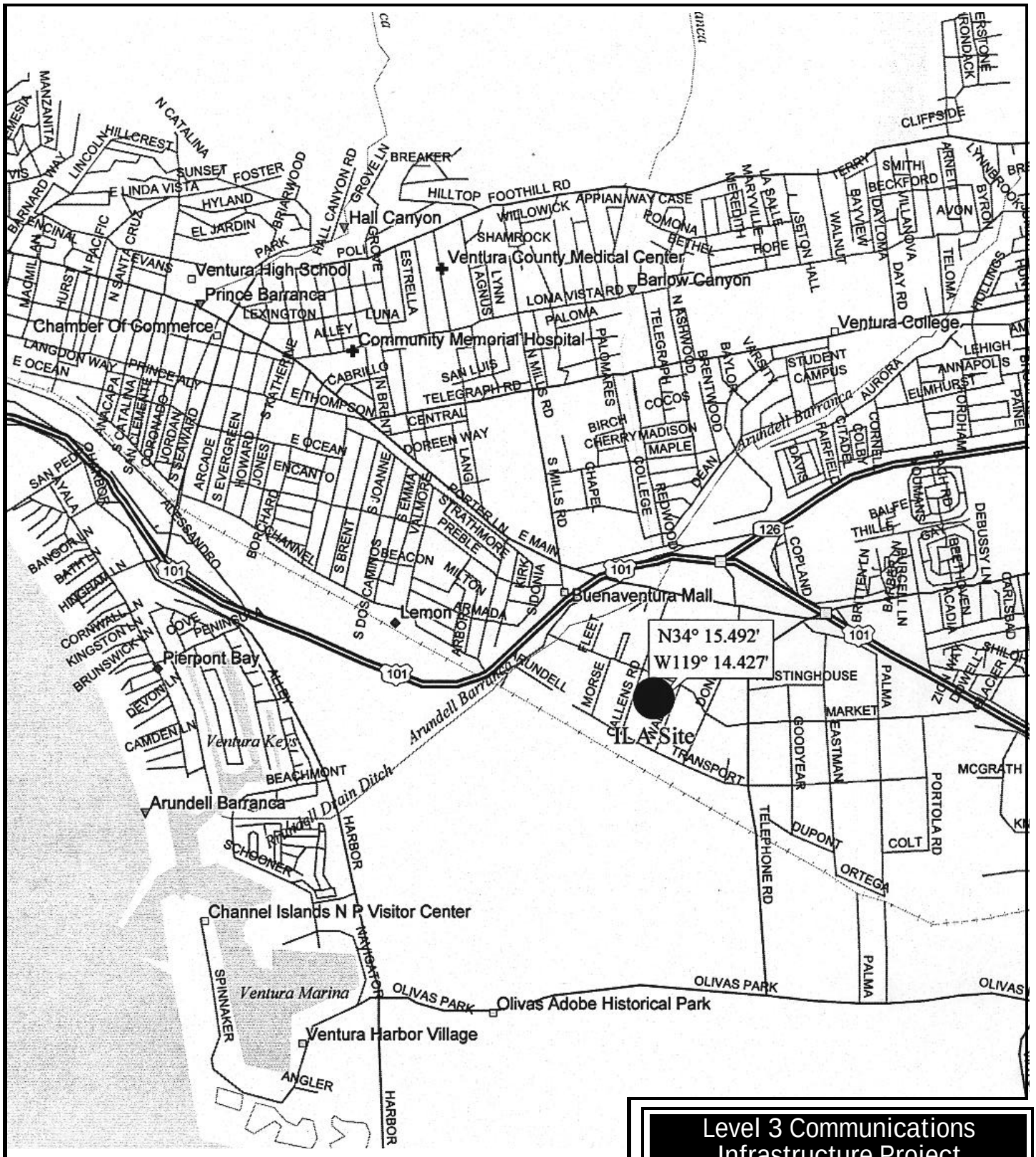
6. General Plan Designation: Existing Urban (EU)

7. Zoning: Manufacturing-Planned-Development (M-P-D)

8. Description of Facility:
This checklist evaluates the design, construction, and operation of the Ventura ILA. This facility, will be located outside of existing utility corridors.

The Ventura ILA will be constructed within an existing building located on a developed 1.01-acre site at 1667 Walter Street. The existing building encompasses approximately 11,664 square feet of the parcel (the building is two-story and has 15,346 square feet of space) and will require retrofitting of finished office space. The building shell will remain intact with the new electronics installed therein. A separate generator structure will be constructed at the southwest corner of the property outside the existing building utilizing an engineered portion of an 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.



Level 3 Communications
Infrastructure Project

Figure 15-1

Ventura ILA
Site Vicinity Map

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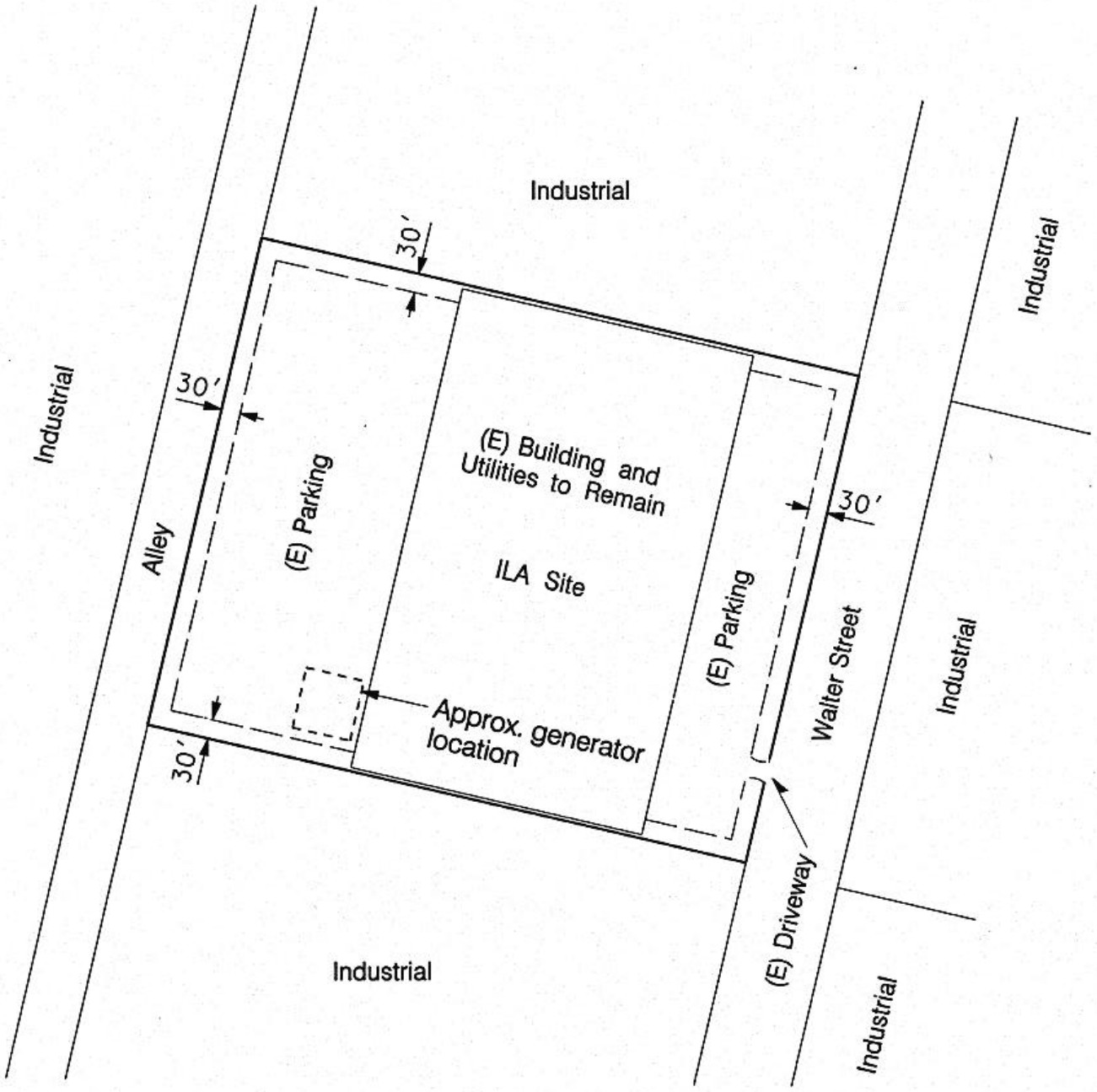
ELECTRICAL, TELEPHONE, WATER AND SEWER TO BE DISTRIBUTED EITHER FROM ON–SITE EXISTING OR FROM EXISTING IN STREET PER NEC AND LOCAL CODES (ON–SITE UTILITIES WILL BE DISTRIBUTED UNDERGROUND)



RequiredSetbacks:
Front-30'
Rear-30'
Side-30'

Source: PEA,2000

Level 3 Communications Infrastructure Project

Figure 15-2

Ventura ILA
Conceptual Plot Plan

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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.

No additional buildings will be constructed. Control and maintenance functions will occur within the proposed facilities. Parking space and a driveway providing access from Walter Street exists to support site maintenance activities. Fencing around the ILA facility will be of chain link construction and will be eight feet tall. A locked gate will restrict access to the site.

The Ventura ILA will require electricity and telephone lines. Utility lines supporting these capabilities are present. Normal electrical power will be provided, consisting of 400-amp, 480-volt, three-phase service. Water and sewer hookups exist, but will not be needed because the site will not be permanently staffed. 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 15-2 is a conceptual plot plan of the Ventura 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 emergency generator will be 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 900 linear feet from the south side of the site. The running line will enter the building from the railroad ROW south of the property using an alley between Walter Street and Callens Road, and will run back to the railroad ROW utilizing Walter Street, Transport Street, and Telephone Road. 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 existing offices will be retrofitted. Retrofitting debris from inside the building and some additional concrete removed for the pad upgrade will require disposal. The estimated volume of demolition debris requiring disposal is 314 cubic yards. During construction, no offsite areas will be required for mobilization or parking of construction or worker vehicles.

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 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 (PEA, 2000, p. 15-2). The tank system design incorporates a high fuel alarm (local) and a tank rupture alarm (remote).

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 25 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, 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) is assumed. Therefore, 30 hours per year multiplied by 16.5 gph equals 495 gallons of diesel fuel consumption per year for testing and maintenance. Testing of the emergency generator will be controlled remotely, and will not be part of site maintenance activities.

Each generator will be equipped 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.

Technical staff will be trained in 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. Each 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 Ventura ILA site are provided in Table 15-1 of the PEA (PEA, 2000, follows p. 15-42). Criteria for inclusion of a project in the cumulative impact assessment are as follows:

- Projects that are within two miles of the site. In some cases these projects are in more than one jurisdiction

- Projects that are scheduled for construction from one year before to one year after the "construction window" for the project facilities, or between March 1999 to March 2003

- Current projects that include those which have been approved by the lead agency and have had their environmental document signed, approved, and/or certified

- Potential projects 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 facility site.

Table 15-1 of the PEA lists 17 approved projects within a two mile radius of the project site. These range from building expansions and additions to commercial, industrial, professional and service-oriented developments. The table lists 17 future projects within two mile of the ILA site as well. These developments are similar in nature to the ones listed above for the currently approved projects, but also include residential development.

9. Surrounding Land Uses and Environmental Setting:

The project site is located in a developed industrial area. Area development is well maintained. Adjacent to the project on the north is an industrial packaging company. Adjacent to the project on the south is an auto parts distributor. There are light industrial use buildings located to the east, across Walter Street, and to the west, across the alley. The only exception to industrial uses in the vicinity is a religious use within an industrial-style building at the corner of Market Street and Walter Street approximately 300 feet away. Resource-specific baseline settings are provided in Sections 1 – XVI of this checklist.

10. Other Agencies Whose Approval is Required:

The site is located within the jurisdiction of the City of Ventura.

The City of Ventura designates the project site for industrial use. The project would be considered a Utility or Equipment Substation, which is a permitted use in the Manufacturing-Planned-Development (M-P-D) zoning district. Because the proposed project is a permitted use in the M-P-D zoning district, it is assumed that the use would be compatible with other uses in the M-P-D Zone. The project would not conflict with any applicable land use plans or regulations. No land use permits would be required by the City of Ventura for development of the proposed project (PEA, 2000, p. 15-3)

Specific local policies relevant to each of the sixteen environmental impact issue areas are provided in Table 15-2 of the PEA (PEA, 2000, follows p. 15-42). 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.

11. Determination:

On the basis of the analysis of this Initial Study, the proposed facility would not have a significant effect on the environment because all potential impacts have been mitigated to a level of less than significant through either (1) the additional mitigation measures recommended in this Checklist, or (2) the Environmental Commitments described below.

The proposed facility is an element of the project addressed in a Petition to Modify 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. The project will incorporate all of the mitigation measures outlined in the previous Decision, as well as those of this environmental review, into its design and construction of the project. 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
- 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
- Documentation and reporting of compliance.

A complete list of mitigation measures from the previous Negative Declaration is provided in Appendix B of the PEA (PEA, 2000, Volume 3).

I. AESTHETICS

Setting

The site is located in an urban landscape dominated by built structures and infrastructure. Existing visual quality is rated low to moderate, viewer sensitivity is rated low, and viewer exposure is rated moderate. Visual absorption capability is rated high since the proposed project will be installed in an existing building (see the Visual Analysis Data Sheet located at the end of this Initial Study). The proposed project will minimally alter the existing building exterior appearance and visual features and no visual contrast is expected. Based on a field study of the site and vicinity, analysis of PEA data and conclusions, a review of applicable local planning policy and guidance, and/or planning agency confirmation of PEA accuracy, no significant visual impacts are anticipated and no mitigation measures are recommended. Figure 15-I-1 shows the location of the Key Viewpoint from which the Visual Analysis Data Sheet was developed. Figure 15-I-2 shows the view from the Key Viewpoint. These figures are located at the end of this Initial Study. Also, see PEA Photos 15-A through C for additional views.

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 ☒

a) No Impact. The project site is not located within the viewshed of a scenic vista. The project will result in only minor changes to the existing building's exterior appearance and visual character as viewed from Walter Street.

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 ☒

b) No Impact. The site is not located on, or in close proximity to, scenic resources such as trees or rock outcroppings. The project is not visible from a scenic highway. See also I.a above.

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 ☒

c) No Impact. Existing views of the site encompass an urban setting of industrial, commercial, and office development; paved surfaces; and infrastructure. Since project construction will only involve interior renovation of an existing building, visual absorption capability is considered high. The proposed project would not significantly change the existing visual character or quality of the site or surroundings.

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 ☒

d) No Impact. No new sources of exterior lighting are proposed. Therefore, the project would not adversely affect day or nighttime views in the area or create glare.

II. AGRICULTURAL RESOURCES

Setting

The site is located in a developed urban area. The General Plan designation is "Existing Urban" and the Zoning designation is "Manufacturing-Planned-Development." The site does not hold any special agricultural designations and is not currently used for agricultural purposes. The site currently contains a 15,346 square-foot industrial building. Based on a field study of the site and vicinity, analysis of PEA data and conclusions, a review of applicable local planning policy and guidance, and/or planning agency confirmation of PEA accuracy, no significant agricultural impacts are anticipated as a result of project implementation.

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 ☒

a) No Impact. The site is not located on land designated as Prime Farmland, Unique Farmland, or Farmland of Local or Statewide Importance. Therefore, the proposed project would not result in the conversion of such farmland to non-agricultural uses.

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 ☒

b) No Impact. The site is not zoned for agricultural use nor is the site under 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 ☒

c) No Impact. The site is a developed urban parcel and does not retain properties of significant agricultural value (see [a] and [b] above). Project construction would result in the continuation of a developed site, and would not result in the conversion of farmland or significant agricultural potential to a non-agricultural use.

III. AIR QUALITY

Setting

The proposed project is within the South Central Coast Air Basin, which is currently designated as a non-attainment area for state and national one-hour average ozone standards and for state and national respirable particulate matter (PM10) standards. Ventura County is also located within a sub-region within the air basin that is designated as a non-attainment 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" non-attainment 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. The distance of the closest sensitive receptor to the closest boundary of the site is 300 feet away.

As part of the ozone and PM10 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. VCAPCD also recommends use of significance criteria of 25 pounds per day of reactive organic compounds (ROCs) or nitrogen oxides (NO_x) to evaluate emissions from individual development projects.

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 lists the specific types of emissions sources that are eligible for exemption. One type of source eligible for exemption under Rule 23 is an emergency internal combustion engine that is operated only during interruptions of utility

power service and during testing and maintenance periods that do not exceed 50 hours per year. The project would include a 300-kW diesel-powered generator for emergency power.

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
	☐	☐	☒	☐

a) Less than Significant Impact. Estimated emissions generated during construction and operation of the proposed project are presented in Table 15-III-1 (PEA, 2000, Table 15-3, follows p. 15-42). These resulting emissions are well-within regulatory thresholds and therefore, in compliance with the applicable air quality plan.

Fugitive dust would not be generated in a significant amount during the construction phase (Table 15-III-1) because this site would use 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 would 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 would include use of a paved road on-site to provide access directly to the buildings and equipment.

Generator testing and the visiting technician vehicle would contribute operational air emissions as shown in Table 15-III-1. The generator would 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. However, to continue to qualify for this exemption, operation of the standby generator would be limited to approximately 30 hours per year calendar year for maintenance purposes, and is subject to documentation requirements.

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

Level 3 has committed to taking 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.

TABLE 15-III-1 AIR QUALITY CALCULATIONS

Construction Engine Emissions

SOURCE	SIZE / GROSS HP	DAILY AMOUNT (1) (hrs or trips)	NUMBER OF DAYS	NUMBER OF UNITS	ONE-WAY DISTANCE (miles)	NO_x EF (2)	NO_x Daily (lbs/day)	NO_x Total (tons)	ROC EF (2)	ROC Daily (lbs/day)	ROC Total (tons)	PM_{10} EF (2)	PM_{10} Daily (lbs/day)	PM_{10} Total (tons)	SO_x EF (2)	SO_x Daily (lbs/day)	SO_x Total (tons)	CO EF (2)	CO Daily (lbs/day)	CO Total (tons)	NOTES
Site Grading (11 cy)																					
Backhoe Loader	200	1	1	1	-	2370	5.2	0.0026	180	0.4	0.0002	15	0.03	0.0000	135	0.30	0.0001	205	0.5	0.0002	6
Vac Truck	153	2	1	1	-	1660	7.3	0.0037	110	0.5	0.0002	15	0.07	0.0000	105	0.46	0.0002	110	0.5	0.0002	6
Surveying Lt-Heavy Duty Truck	117	3	1	1	-	780	5.2	0.0026	72	0.5	0.0002	44	0.29	0.0001	85	0.56	0.0003	105	0.7	0.0003	6
Lt-Heavy Duty Truck	10 cu yd	1	1	1	30	11.3	1.5	0.0007	2.2	0.3	0.0001	0.59	0.08	0.0000	0.31	0.04	0.0000	14.0	1.9	0.0009	7
Worker Light Truck	175	1	1	1	30	18.4	2.4	0.0012	4.4	0.6	0.0003	0.84	0.11	0.0001	0.31	0.04	0.0000	35	4.6	0.0023	6
Equipment Delivery Truck	Low boy	3	1	-	30	11.3	4.5	0.0022	2.2	0.9	0.0004	0.59	0.23	0.0001	0.31	0.12	0.0001	14.0	5.6	0.0028	7
Worker Light Truck	Light	2	1	-	30	1.0	0.3	0.0001	0.35	0.1	0.0000	0	0.00	0.0000	0.06	0.02	0.0000	7.22	1.9	0.0010	7
Maxima and Subtotals (Site Grading)							16.0	0.0132		2.3	0.0016		0.71	0.0004		0.78	0.0008		14.6	0.0078	
Gutting of Building Interior (314 cu.yds.)																					
Semi-end Dump Trucks	20 ton	4	3	-	100	11.3	19.8	0.0298	2.2	3.9	0.0058	0.59	1.04	0.0016	0.31	0.55	0.0008	14.0	24.8	0.0371	7
Worker Light Truck	Light	12	3	-	30	1.00	1.6	0.0024	0.35	0.6	0.0008	0	0.00	0.0000	0.06	0.10	0.0001	7.22	11.5	0.0172	7
Maxima and Subtotals (Demolition)							21.4	0.0321		4.4	0.0067		1.04	0.0016		0.64	0.0010		36.2	0.0543	
Pad Construction (11cy)																					
Cement Truck	10 yd3	1	1	-	30	11.3	1.5	0.0007	2.2	0.3	0.0001	0.59	0.08	0.0000	0.31	0.04	0.0000	14.0	1.9	0.0009	7
Gravel Truck	10 yd3	1	1	-	30	11.3	1.5	0.0007	2.2	0.3	0.0001	0.59	0.08	0.0000	0.31	0.04	0.0000	14.0	1.9	0.0009	7
Worker Light Truck	Light	2	1	-	30	1.00	0.3	0.0001	0.35	0.1	0.0000	0	0.00	0.0000	0.06	0.02	0.0000	7.22	1.9	0.0010	7
Maxima and Subtotals (Pad Construction)							3.2	0.0016		0.7	0.0003		0.16	0.0001		0.10	0.0000		5.6	0.0028	
Trenching & Utility Installation (350cy)																					
Excavator	84	8	12	1	-	774	13.6	0.0819	64	1.1	0.0068	13	0.23	0.0014	58	1.02	0.0061	79	1.4	0.0083	6
Equipment Delivery Truck	Low boy	1	2	-	30	11.3	1.5	0.0015	2.2	0.3	0.0003	0.59	0.08	0.0001	0.31	0.04	0.0000	14.0	1.9	0.0019	7
Worker Light Truck	Light	2	12	-	30	1.00	0.3	0.0016	0.35	0.1	0.0006	0	0.00	0.0000	0.06	0.02	0.0001	7.2	1.9	0.0115	7
Maxima and Subtotals (Trenching and Utility Installation)							15.4	0.0850		1.5	0.0076		0.31	0.0015		1.08	0.0062		5.2	0.0216	
Shelter Placement																					
Crane	150 ton	2	1	1	-	576	2.5	0.0013	82	0.4	0.0002	64	0.28	0.0001	41	0.18	0.0001	1624	7.2	0.0036	8
Equipment Delivery Truck	Low boy	1	1	-	150	11.3	7.4	0.0037	2.2	1.5	0.0007	0.59	0.39	0.0002	0.31	0.21	0.0001	14.0	9.3	0.0046	7
Worker Light Truck	Light	2	1	-	30	1.00	0.3	0.0001	0.35	0.1	0.0000	0	0.00	0.0000	0.06	0.02	0.0000	7.2	1.9	0.0010	7
Maxima and Subtotals (Shelter Placement)							10.2	0.0051		1.9	0.0010		0.67	0.0003		0.40	0.0002		18.4	0.0092	
General Construction Activities																					
Compactor	<25 hp	1	1	1	-	8	0.0	0.0000	227	0.5	0.0002	1.4	0.00	0.0000	0	0.00	0.0000	6350	14.0	0.0070	8
Equipment Delivery Truck	Low boy	1	1	-	30	11.3	1.5	0.0007	2.2	0.3	0.0001	0.59	0.08	0.0000	0.31	0.04	0.0000	14.0	1.9	0.0009	7
Construction Generator	<50 hp	8	12	1	-	0.02	0.0	0.0000	0.002	0.0	0.0000	0.001	0.00	0.0000	0.00	0.00	0.0000	0.01	0.0	0.0000	8
Water Truck	4500 gal.	1	2	-	30	11.3	1.5	0.0015	2.2	0.3	0.0003	0.59	0.08	0.0001	0.31	0.04	0.0000	14.0	1.9	0.0019	6
Worker Light Truck	Light	1	17	-	30	1.0	0.1	0.0011	0.35	0.0	0.0004	0	0.00	0.0000	0.06	0.01	0.0001	7.2	1.0	0.0081	7
Maxima and Subtotals (General Construction)							3.1	0.0034		1.1	0.0011		0.16	0.0001		0.09	0.0001		18.7	0.0179	
Maxima and Subtotals, Construction Engine Emissions [3]							21.4	0.1404		4.4	0.0183			0.0040			0.0084			0.1136	
Total Construction Emissions (Fugitive plus exhaust)								0.1404			0.0183			0.1325			0.0084			0.1136	
Construction Thresholds							25 lb/day			25 lb ROC/day				--			--			--	
Insignifigant Impact [9]							Yes			Yes				Yes			Yes			Yes	

Construction Fugitive Dust Emissions

SOURCE	DAILY AMOUNT (hours)	DAYS OF ACTIVITY	AREA OF GRADING / TRENCHING	PM_{10} EMISSIONS EF	PM_{10} EMISSIONS (daily lbs)	PM_{10} EMISSIONS (total tons)	NOTES
Gutting of Building Interior	8	3	0.27 acres	39.4 lb/acre-day	11	0.016	12
Access Road Use	8	17	0.23 acres	39.4 lb/acre-day	9.1	0.077	13
Trenching - Cable Installation	8	12	-	0.51 lb/hr	4.1	0.024	
Wind Erosion	24	12	0.29 acres	6.6 lb/acre-day	1.9	0.011	11
Subtotal, Construction Fugitive Emissions [3]					12	0.13	15
Total PM10 Construction Emissions (Engine Exhaust and Fugitive) [3]						0.13	

(Continued)

Operation Emissions [4]

SOURCE	SIZE / GROSS HP	DAILY AMOUNT (hours)	DAYS OF ACTIVITY	NUMBER OF UNITS	ONE-WAY DISTANCE (miles)	NO_x EF (g/hr) [2]	NO_x Daily (lbs/day)	NO_x Annual (tons/year)	ROC EF (g/hr) [2]	ROC Daily (lbs/day)	ROC Annual (tons/year)	PM_{10} EF (g/hr) [2]	PM_{10} Daily (lbs/day)	PM_{10} Annual (tons/year)	SO_x EF (g/hr) [2]	SO_x Daily (lbs/day)	SO_x Annual (tons/year)	CO EF (g/hr) [2]	CO Daily (lbs/day)	CO Annual (tons/year)	NOTES
Emergency Generator	337 (300 KW)	0.5	60	1		2,325	2.6	0.08	337	0.37	0.011	135	0.15	0.004	313	0.35	0.010	2,865	3.2	0.09	6,14
Worker Light Truck	Light	-	60	1	30	1.0	0.13	0.004	0.35	0.05	0.001	0	0	0	0.06	0.01	0.0002	7.2	0.96	0.03	7
Total Operation Emissions [5]							2.70	0.08		0.42	0.013		0.15	0.004		0.35	0.011		4.1	0.12	
Operation Thresholds							Exempt			Exempt			Exempt			Exempt			Exempt		
Insignifigant Impact [10]							Yes			Yes			Yes			Yes			Yes		

'- = Not applicable

Unit abbreviations: g/hr = grams per hour, lb/day = pounds per day, tpy = tons per year, tpq = tons per quarter

(1) Daily amount is measured in hours for off-road construction equipment (e.g., grader), and in number of trips for on-road vehicles (e.g., worker light-truck).

(2) Emission factors are in grams per hour for off-road equipment, and in grams per mile for on-road vehicles.

(3) Construction engine emission subtotals are for the complete project. Major pieces of construction off-road equipment (e.g., grader, dozer) are used consecutively, not concurrently.

(4) Operation and construction will not occur simultaneously, and hence, the emissions are not additive.

(5) Operational emission totals are for the project. Only one generator will be tested on a single day.

(6) Emission factors are from Caterpillar Corp.

(7) EMFAC7G Emission Factors (1998, 15mph, 75°F)

(8) SCAQMD CEQA Handbook, Table A9-8-B

(9) Construction emissions have insignifigant impact when no emission of a major piece of off-road equipment exceeds threshold (i.e., major pieces are used consequently, not concurrently).

(10) Operation emissions have an insignificant impact if emergency generators are exempt from regulatory limits or if no regulations apply.

(11) Number of days subject to wind erosion equal to days for trenching.

(12) Area to be graded is sum of 115-foot by 66-foot fenced compound and 10-foot wide perimeter band.

(13) Access road assumed to be 1000 ft long and 10 ft wide.

(14) The 25-minute test cycle will be conducted mostly at 50 percent load. To be conservative, the horsepower is stated and emissions are calculated at 75 percent load.

(15) Daily construction fugitive emissions includes the specific activity plus wind erosion.

In addition, Level 3 has committed to implementing 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).
- 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.

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 which may contain the fungus which causes San Joaquin Valley Fever.
- The area disturbed by grading and trenching operations will be minimized so as to prevent excessive amounts of dust.

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
	☐	☐	☒	☐

b) Less than Significant Impact. Construction of the project would generate fugitive dust 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 would be temporary and intermittent.

Estimates of construction-related engine and fugitive dust emissions are presented in Table 15-III-1. There are no numerical thresholds for fugitive dust (PM_{10}) emissions from construction activities.

Over the long-term, the project would result in emissions from operation of both stationary and mobile sources. However, mobile source emissions would be negligible because the site would not be permanently staffed. Routine motor vehicle activity would result only from weekly site visits to check on the computers and download information. 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 above ground diesel storage tank would be negligible.

Routine maintenance tests of the standby engine would be approximately one-half hour. Emissions based on manufacturer estimates on a given day when the engine would undergo such a test, are presented in Table 15-III-1. These levels are below the VCAPCD-recommended significance threshold for operational-phase impacts (25 pounds per day).

c)	Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal 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 ☐

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

As indicated in Tables 15-III-1 and 16-III-1, the estimated NO_x emissions that would be generated by simultaneous construction of the proposed Ventura and Moorpark ILA sites are 21.4 lbs/day and 16.5 lbs/day, respectively. These total combined cumulative emissions would exceed the daily threshold for NO_x (25 lbs/day). Simultaneous construction at two sites would exceed the daily numerical threshold for NO_x. Therefore, construction at these sites will not occur concurrently.

Cumulative emissions from testing and maintaining the emergency generators at the two 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.

Level 3 has committed to limiting construction to one Ventura County site per day to avoid significant impacts on NO_x emissions.

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 ☐

d) Less than Significant 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, but which do not qualify as sensitive receptors. The distance of the closest sensitive receptor to the closest edge of the site is 300 feet.

Project construction, except for trenching and limited grading activities would take place primarily within an existing building. Therefore, receptors associated with surrounding industrial uses, and sensitive receptors 300 feet away, would be buffered from the effects of project construction (see Figure 15-2). 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 would be kept below a level of significance.
The emergency generator would produce operation emissions during testing and power outages. Two factors prevent these emissions from significantly affecting sensitive receptors. First, the generator would not be located in close proximity to sensitive receptors due to the industrial character of the surrounding area. Second, generator usage would be restricted to approximately 30 minutes per week. These measures would 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 ☒

e) No Impact. The project would not include activities that create objectionable odors.

IV. BIOLOGICAL RESOURCES

Setting

The condition of the site and immediate project area to support biological resources is poor. The site itself is a concrete commercial structure and is located within a completely developed commercial setting. The vegetation present onsite is limited to ornamental non-native species. The perimeter and surrounding areas are paved with the exception of the landscaping. 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 evidence of nesting birds was observed. The only wildlife species observed during the survey was the mourning dove (~~*Macrouris zenaidis*~~). Plant species observed included fig (~~*Ficus carica*~~), ivy (~~*Senicio sp.),*~~ bougainvillea, and fescue (~~*Festuca*~~ 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 ☒

a) No Impact. The site consists of a concrete building located within a completely developed urban setting. There is no habitat 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 as mentioned above, therefore the project is

Table 15-IV-1 **Potential for Habitat at the Ventura ILA Site to Support Sensitive Species Occurring in the Vicinity**
Aphanisma (*Aphanisma blitoides*), a federal species of concern with a CNPS listing of 1B, is an annual herb that blooms approximately from April to May. It typically occurs on bluffs and slopes near the ocean in sandy or clay soils found within coastal bluff scrub, coastal dunes, or coastal scrub plant associations. The species is in steep decline within California and its associated islands. *This site is entirely developed and lacks suitable habitat for aphanisma.*
The Ventura marsh milk-vetch (*Astragalus pycnostachyus* var. *lanosissimus*), a federally proposed endangered and California state candidate for listing with a CNPS listing of 1A, is a perennial herb flowering between the months of July and October. It is typically found within the reach of the high tide line or protected by barrier beaches, and more rarely located near seeps on sandy bluff. Historically, the population has been constricted to coastal southern California and is known only at one site in Ventura county. *This site is entirely developed and lacks suitable habitat for Ventura marsh milk-vetch.*
The Late-flowered mariposa lily (*Calochortus weedii* var. *vestus*) is a federal species of concern with a CNPS listing of 1B. This species is a perennial herb generally occurring in dry, open coastal woodland and chaparral communities within serpentine soils. It typically blooms between the months of June and August *This site is entirely developed and lacks suitable habitat for late-flowered mariposa lily.*
*The southern tarplant (*Hemizonia parryi *ssp.* australis*) is a federal species of concern with a CNPS listing of 1B often found in disturbed sites near the coast with alkaline soils (sometimes with saltgrass) vernal pools, and the margins of marshes and swamps. This species is an annual herb that blooms during the months of June through November. Its population stretches from southern California to Baja California.* This site is entirely developed and lacks suitable habitat for southern tarplant.
The Coulter's goldfields (*Lasthenia glabrata* ssp. *coulteri*), a federal species of concern with a CNPS listing of 1B, an annual herb that flowers from February to June. Mostly in alkali playas and alkali grasslands located in and around coastal salt marshes and vernal pools generally situated under 550m. *This site is entirely developed and lacks suitable habitat for Coulter's goldfields.*
Monarch butterfly (*Danaus plexippus*) has no listing but its winter roost sites are considered sensitive habitat by the CDFG. These roost sites include groves of eucalyptus, Monterey pine, and cypress trees. *The site does not include stands of trees necessary for monarch butterfly roosting habitat.*
The tidewater goby *(Eucyclogobius newberryi)* is a federally proposed for delisting north of Orange county and is a California state species of concern found in brackish water habitats along the southern California coast. The tidewater goby is found in shallow lagoons and lower stream reaches. *This site has no aquatic habitat for the tidewater goby.*
The southern steelhead (*Oncorhynchus mykiss irideus*), a federally endangered and California state species of concern, is associated with perennial streams of coastal southern California. Southern steelhead depend more on fresh water streams than most salmonid species. They generally rely on the headwater areas of rivers and streams for nursery areas. Unlike other salmonids species, southern steelhead usually do not die after spawning. *This site has no aquatic habitat for the southern steelhead.*
The southwestern pond turtle (*Clemmys marmorata pallida*), a federal and California state species of concern, is found along streams with deep pools, basking sites, and safe underwater retreats. *This site has no aquatic habitat for the southwestern pond turtle.*
The western snowy plover (*Charadrius alexandrinus nivosus*) is a federal threatened species and a California state species of concern. This species usually nests on beach sand, but is often found in open areas close to lagoons or dry lakebeds. Breeding season begins in mid-March and extends into late-July. *This site has no aquatic habitat for the western snowy plover.*
*The least Bell's vireo (*Vireo bellii pusillus*), a federal and California state endangered species, is a summer resident to southern California. It usually inhabits areas of low riparian growth in the vicinity of water or in dry river bottoms. It typically nests along margins of bushes or on twigs projecting into pathways (usually willow,* Baccharis *sp., or mesquite).* *This site has no riparian habitat for the least Bell's vireo.*
The tricolored blackbird (*Agelaius tricolor*), a federal and California state species of special concern, is a highly colonial species with most of its population located in the central valley and neighboring lands. This species is largely endemic to California. It requires open water, protected nesting substrate, and foraging area that supports an adequate amount of insects. *This site has no riparian habitat for the tricolored blackbird.*
The western yellow-billed cuckoo (*Coccyzus americanus occidentalis*) is a California state endangered species. This bird is a riparian forest nester usually found along the broad flood-bottoms of larger river systems. It is typically found in riparian jungles of willow, often mixed with cottonwoods with a lower story of blackberry, nettles, or wild grape. *This site has no riparian habitat for the western yellow-billed cuckoo.*

Source: California Department of Fish and Game (CDFG), *Saticoy Quadrangle, California Natural Diversity Database*, March 2000.

not expected to result in any impacts to such species. A list of potential sensitive species was created based upon a California Natural Diversity Database search (Saticoy Quadrangle, California Department of Fish and Game, March 2000) and knowledge of the site vicinity. Table 15-IV-1 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 ☒

b) 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 onsite. 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 ☒

c) 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 proposal 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 ☒

d) No Impact. The site and the immediate surroundings have been paved and developed. Because the site is void of natural habitat and highly unlikely to support any 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 proposal 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 ☒

e) No Impact. The City of Ventura tree ordinance states that trees may be removed subject to the Parks Manager's approval. A new tree may be required to replace the one removed or destroyed (Parks Division, City of Ventura, Tree Ordinance, Resolution NO. 86-8). 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. However, 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 ☒

f) No Impact. The County of Ventura does not have a HCP or any applicable local policies or ordinances protecting biological resources. A response has not been received from the City of Ventura concerning applicable HCP, NCCP, or other approved local, regional, or state habitat conservation plan. However, given the urban and industrial setting in which the project site is located, it is unlikely that the project will conflict with any conservation plan mentioned above.

V. CULTURAL RESOURCES

Setting

The ILA parcel is located on the alluvial plain of the Santa Clara River at 1667 Walter Street in the eastern part of the City of Ventura, Ventura County. The property has a recently built commercial/warehouse structure and the rest of the parcel is paved. The project area is located in the region occupied by the Chumash when the first Spanish land expedition passed through the area in A.D. 1769.

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 ☒

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 ☒

a) and b) No impact. An archival record search was completed for the site and area within a one-mile radius by the California Historical Resources Information System (CHRIS), South Central Coastal Center, UC Los Angeles. The search also included a check of the California Office of Historic Preservation Historic Property Data File for Ventura County, the National Register of Historic Places (listings and eligibility determinations), California Points of Historical Interest, California Register of Historical Resources, and California Historical Landmarks. The records search reported that the property had not been previously surveyed (File No. 8030b) and that there are no previously recorded prehistoric and historic archaeological sites within one mile of the project although one ethnographically reported village, ~~*Knaputeknon*~~, may have existed at one time in the general vicinity of the project site. No other properties within a mile are listed on the National Register of Historic Places, the California Register of Historical Resources, California State Historic Resources Inventory, California Historical Landmarks, and California Points of Historical Interest.

The State of California Native American Heritage Commission (NAHC) completed a search of the NAHC Sacred Lands file with negative results and identified locally knowledgeable Native Americans for follow-on contact/consultation. These individuals were contacted, and no response has been sent to Level 3 as of March 14, 2000.

The field inventory noted no exposed ground surface on the parcel. The structure on the project parcel is not eligible for the California Register of Historical Resources as 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. The facility will be installed inside this 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 ☐

c) Less than Significant Impact. The project site is underlain by Quaternary younger alluvium (Qa). No fossil localities are recorded at the project site or elsewhere in the Saticoy 7.5-minute quadrangle. Although there is a potential for early Holocene and late Pleistocene vertebrate and land plant fossil remains occurring in the subsurface, it is unlikely that construction-related earthmoving activities would extend to a depth sufficient to encounter remains old enough to be considered fossilized (PEA, 2000, p. 17).

Level 3 has already committed to paleontological monitoring when earth-moving activities extend 5 feet below current grade. Paleontological monitoring will be conducted by a qualified vertebrate paleontologist to allow for recovery of larger fossil remains and rock samples will be processed to allow for the recovery of smaller fossil remains. All recovered fossil remains will 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 will prepare a final report of findings that includes an inventory of recovered fossil remains. These measures would be in compliance with the Society of Vertebrate Paleontology Guidelines for the management of paleontologic resources and for the museum's acceptance of a monitoring program for 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 ☒

d) No Impact. The CHRIS records search and field survey provided no evidence of the presence of human remains (File No. 8030b). If suspected human remains are encountered during construction, operations will stop until the proper official is notified, the find evaluated, any mitigation recommendations implemented, and Level 3 has been cleared to resume construction in the area of the find (see ~~*Level 3 Long-Haul Fiber Optics Project Cultural Resources Procedures*~~ (PBNS, 1999:25-39)).

VI. GEOLOGY AND SOILS

Setting

The Ventura site is in the southeast portion of the City of Ventura. The site is on the alluvial plain north of the Santa Clara River. The area is essentially flat and slopes gently south toward the river. The site is underlain by an unknown thickness of artificial fill, which is underlain by several thousand feet of alluvial and estuarine deposits. These deposits vary laterally and consist of interbedded layers of clay, silt, sand, and gravel. Sand and gravel are generally fine to medium grained and loose to medium dense. Clays are generally soft to medium firm, with low to high plasticity. The project site is within a seismically active region and approximately one-mile from the Alquist-Priolo zone of the Ventura-Pitas Point fault. Other local, active faults that may generate significant seismic shaking include the Red Mountain fault and Oak Ridge fault (CDMG, 1999).

Based on a comprehensive study by the City of Ventura, the site is within an area considered to have high liquefaction potential. Additionally, the area is considered to have a moderate potential for expansive soils (Staal, Gardner, Dunne, 1992). Groundwater is reported to be present at a depth of approximately 10 feet beneath the site.

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 ☐

a) Less than Significant Impact. The project site is about one mile from an Alquist-Priolo zone for the Ventura-Pitas Point fault (CDMG, 1999). Previous studies in the area (Staal, Gardner, Dunne, 1992) indicate that liquefiable materials may underlie the site. The project area is susceptible to severe to moderate magnitude groundshaking (Blake, 1998; CDMG, 1973). The major active faults in the vicinity of the project site and their approximate distance from the project site are as follows:

- Oak Ridge (onshore), 2 miles
- Oak Ridge (blind thrust offshore), 6 miles
- Red Mountain, 8 miles
- Simi –Santa Rosa, 8 miles
- Ventura-Pitas Point; 2 miles (Blake, 1998).

Accordingly, building and structural design will meet Uniform Building Code-Zone 4 Seismic Standards, and all local building and seismic codes to minimize potential seismic hazards. The site is in an area with little to no landslide hazard (CDMG, 1973).

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 ☒

b) No Impact. The project area is relatively flat and is in an area designated as having low erosion activity (CDMG, 1973).

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 ☒

c) No Impact. The project site is relatively flat and is not located in an area with unstable soil or geologic units.

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 ☒

d) No Impact. The project area is in an area identified as having moderately expansive soil (CDMG, 1973). Compliance with state and local building codes will minimize any potential impacts.

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 ☒

e) No Impact. Existing municipal sewer connections at the site would be used for wastewater disposal. No septic tanks or leach fields would be required. Therefore, no impacts would occur (PEA, 2000, p. 15-19).

VII. HAZARDS AND HAZARDOUS MATERIALS

Setting

The area is densely developed, with land uses comprising light industrial and manufacturing operations. Review of a database of regulatory agency recognized hazardous waste sites revealed no potentially contaminated sites at or within one mile of the project site (Vista, 1999). No schools are located within one-quarter mile of the site, and the project is not located near an airport or within an airport safety zone (PEA, 2000, p. 15-19). Fuel for the standby generator would be stored in an aboveground storage tank onsite.

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 ☒

a) No Impact. The Proponent will handle and store hazardous materials onsite in compliance with applicable federal, state, and local regulations.

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 ☒

b) No Impact. Leak monitoring and spill containment features planned for the onsite aboveground fuel storage tank minimize the risk of hazardous substance release through foreseeable upset or accident conditions.

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 ☒

c) No Impact. No schools or proposed schools are within one-quarter mile of the project 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 ☒

d) No Impact. The project site is not included on a list of regulatory agency recognized hazardous materials sites (Vista, 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 ☒

e) No Impact. The project site is not within an airport land use plan or within two miles of a 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 ☒

f) No Impact. There are no private airstrips within the vicinity of the project site.

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 ☒

g) No Impact. Development of this site for use as a regeneration facility would not alter, impair, or interfere with adopted emergency response and evacuation plans.

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 ☒

h) No Impact. The proposed structure would be in an urbanized area zoned for Manufacturing-Planned Development. The structure is not located in the vicinity of any wildland areas and the potential for wildfire to reach the site is minimal.

Level 3 has already committed to equip generators with spark arrestors to minimize potential impacts.

VIII. HYDROLOGY AND WATER QUALITY

Setting

The facility is to be constructed within an existing building. The site is not located within a 100-year floodplain, but is within the 500-year floodplain limits (PEA, 2000, Figure 15-9).

Level 3 has committed to taking the following actions to ensure that hydrology/water quality impacts are minimized during construction and operation of this site. The actions will be applied as appropriate. Details regarding these actions have been provided (PEA, 2000, Appendix E, Volume 3).

- 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.

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

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 ☒

a) No Impact. Proposed construction, operation, and waste disposal activities are to be performed 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 ☒

b) No Impact. The project will not involve groundwater extraction. Net impermeable area will not be increased on the site, so groundwater recharge will not be impacted.

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 ☒

c) No Impact. The project involves construction within an existing building. No site grading is anticipated nor will there be any net change in impervious surfaces. Thus, no changes in erosion or siltation characteristics on or off site are anticipated.

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 ☒

d) No Impact. The project involves construction within an existing building. No site grading is anticipated nor will there be any net change in impervious surfaces. Thus, no changes in storm water drainage characteristics are anticipated.

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 ☒

e) No Impact. No site grading is anticipated nor will there be any net change in impervious surfaces. The project involves construction within an existing building, so no net change in the amount and characteristics of runoff is expected.

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

f) Less than Significant Impact. Proposed construction practices are expected to minimize impacts to water quality to the less than significant level.

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 ☒

g) No Impact. The project does not include housing.

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 ☒

h) No Impact. The project is not located within a 100-year floodplain (PEA, 2000, Figure 15-9).

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 ☐

i) Less than Significant Impact. Some flooding potential exists at the site -- the site is within the 500-year floodplain limits (PEA, 2000, Figure 15-9). However, since the site is not to be permanently staffed, the risk of injury or death would occur only during project construction and maintenance, and is therefore considered less than significant.

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 ☒

j) No Impact. The site is not located within an area subject to inundation by seiche, tsunami, or mudflow (PEA, 2000, p. 15-23).

IX. LAND USE PLANNING

The proposed site is located at 1667 Walter Street in the City of Ventura. The general project vicinity is urban with a mix of industrial, commercial, and office development. The 1.01-acre site is occupied by a 15,346 square-foot concrete tilt-up industrial building that is proposed to be renovated for occupancy by the ILA. The site is bordered by Walter Street on the west, with commercial and light industrial uses on the south, east, and north. See Figure 15-1 in this Initial Study and PEA Figures 15-1 through 8 for the locator and vicinity maps.

The General Plan land use designation for the project site is "Existing Urban" while the Zoning designation is "Manufacturing-Planned-Development." The proposed project could be permitted as a utility or equipment substation under the M-P-D zoning designation. The project is not anticipated to conflict with any adjacent uses and is considered consistent with the General Plan and Zoning Ordinance. Based on a field study of the site and vicinity, analysis of PEA data and conclusions, a review of applicable local planning policy and guidance, and/or planning agency confirmation of PEA accuracy, no significant land use impacts are anticipated. See Figure 15-1 in this Initial Study and PEA Figures 15-5, 7, and 8 for locations of adjacent uses.

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 ☒

a) No Impact. The project site is already developed. The proposed project would reuse the existing building and it's location would not divide elements of the local 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 ☒

b) No Impact. The General Plan land use designation for the project site is "Existing Urban" while the Zoning designation is "Manufacturing-Planned-Development." The proposed project could be permitted as a utility or equipment substation under the M-P-D zoning designation. The proposed project is not expected to conflict with any applicable land use plans, policies, or regulations.

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 ☒

c) No Impact. The proposed ILA site is an existing developed site. The proposed project would not conflict with the provisions of any adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

X. MINERAL RESOURCES

Setting

The project area is not located in an area designated by the State or Ventura County for mineral resources (PEA, 2000, p. 15-25).

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 ☒

a) No Impact. There are no known mineral resources within the project area.

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 ☒

b) No Impact. There are no known mineral resources within the project area.

XI. NOISE

Setting

A number of industrial establishments are located adjacent to the site. It is designated as "Industrial" anned Development (M-P-D)". The nearest receptor of construction and operation noise is an industrial building located at the southern site boundary.

The City of Ventura restricts construction activities to the period 7 am to 8 pm any day of the week. Construction activities are not subject to numerical noise thresholds during allowed construction hours. The City of Ventura Noise Ordinance limits noise levels to 75 dBA at the property line of any receiving property.

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 ☐

a) Less than Significant Impact. Level 3 would comply with local construction-related noise ordinances by restricting construction activities to between the period of 7 am and 8 pm. The City of Ventura does not quantitatively limit construction noise during these hours, nor does it impose additional restrictions on construction noise outside of the conditions that may be imposed by a land use permit. Therefore, potential construction related impacts are less than significant.

With regard to operations, the emergency generator would be the main source of operational noise at the facility. However, the emergency generator would be located at least 10 feet from the southern property line of the proposed site and would be housed in a specially-designed enclosure that would reduce noise levels to 75 dBA at 5 feet. In addition, noise from generator testing procedures would be restricted to 30 minutes per week. The resulting noise level at the property line closest to the generator shelter (the south boundary) would be 69 dBA. This is less than the City of Ventura's 30 minute-per-

hour-exposure Leq of 75 dBA and the maximum continuous Leq of 70 dBA for industrial properties. Therefore, impacts are considered less than significant.

Level 3 has committed to the following mitigation measures to minimize potential impacts:

- Level 3 would comply with local construction-related noise ordinances by restricting construction activities to the period 7 am to 8 pm
- The generator would be enclosed within a shelter that reduces operating noise to 75 dBA at a distance of 5 feet from the shelter building
- The generator shelter would be no less than 10 feet from the property line of the nearest receptor.

b)	Would the proposal 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 ☐

b) Less than Significant Impact. Neither project construction or project operations would generate excessive groundborne noise or vibration. The low level groundborne vibration and noise generated during construction would be short term in nature, and generally would not extend more than a few feet from the active construction area. In addition, construction of new facilities would be limited due to the reuse of an existing building. Therefore, potential impacts associated with groundborne vibrations during construction of the proposed project are less than significant.

With regard to operations, the emergency generator would be the only potential source of excessive groundborne vibration during weekly 30-minute test periods and during power outages. The generator would be mounted on a concrete pad and would have a minimum of 4 vibration isolators that reduce vibration by 95 percent. The buried fiber optic cable would not generate any perceptible vibrations or noise. Therefore, potential impacts associated with excessive groundborne vibration during project operations are less than significant.

c)	Would the proposal 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 ☒

c) No Impact. There would be no permanent noise sources at the facility. Therefore, there would be no impacts.

d)	Would the proposal 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 ☐

d) Less than Significant Impact. Temporary increases in ambient noise levels would occur during the approximate two month construction period, but these would not be significant and would comply with the local construction noise ordinance. Weekly testing for a period of approximately 30 minutes and during power outages would generate periodic operational noise. The location and enclosure of the

generator would reduce potential project construction and operational impacts at sensitive receptor locations to less than significant.

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 ☒

e) No Impact. The site is not located within an airport land use plan, nor within two miles of a public airport or a public use airport.

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 ☒

f) 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 Ventura, with a population 102,319 (PEA, 2000, p. 15-29). The project site is developed with one industrial building and is located in a developed industrial area. The nearest housing is located along Sea Estates Place, a Mobile Home park located approximately one-quarter mile northwest from the project site. There are no local policies for population and housing that 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 ☒

a) No impact. The proposed project would be an unmanned facility, and would not induce new employment. The project does not involve the development of new housing, or the expansion of new roadways or infrastructure. As such, no growth inducing impacts would occur.

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 ☒

b) No impact. The project would involve the reuse of an existing industrial building as an unmanned ILA station. No existing housing would be removed. Consequently, there would be no need for replacement housing elsewhere.

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 ☒

c) No impact. The project would consist of the reuse of an existing industrial building. The project does not involve the removal of any existing housing and would not, therefore, displace any people.

XIII. PUBLIC SERVICES

Setting

The project site is located in the City of Ventura. Fire protection is provided by the City of Ventura Fire Department and the City of Ventura Police Department provides police protection. Public Facilities in the vicinity of the project include Arundell Linear Park, located approximately one-half mile west of the site along the Arundell Barranca; Blanche Reynolds Park, located approximately one mile west of the site on Preble Avenue; and Camino Real Park, located approximately three-quarter miles north of the site. A fire station, the California Highway Patrol, and the Department of Motor Vehicles are located within one mile east of the site. One high school is located approximately one mile north of the site, and one private elementary school is located approximately one-half mile west of the site (PEA, 2000, p.15-32).

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 ☒

a) No Impact. Construction and operation of the unmanned ILA facility would have no impact on the local school, parks or other public facilities. The site would not have a significant impact on police services. A 1,000-gallon, double-walled, aboveground diesel fuel storage tank would be located on the facility grounds. Tank system design incorporates a high fuel alarm (local) and a tank rupture alarm (remote). Fire protection equipment would be installed per local codes. There are no parks in close proximity to the Ventura ILA. The Ventura ILA would not have a physical effect on any parks or increase the need for parks in the area.

XIV. RECREATION

Setting

There are several parks located within approximately one mile of the proposed project site including: Arundell Linear Park (approximately one-half mile west), Blanche Reynolds Park (approximately one mile west), and Camino Real Park (approximately three-quarters of a mile north). However, due to the un-staffed nature of the ILA facility, the proposed project will not result in additional use of existing recreation facilities or require construction of additional recreational facilities. Based on a field study of the site and vicinity, analysis of PEA data and conclusions, a review of applicable local planning policy and guidance, and/or planning agency confirmation of PEA accuracy, no significant recreation impacts are anticipated with project implementation.

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 ☒

a) No Impact. The proposed project will not be permanently staffed. Therefore, the proposed project will not contribute additional use of any recreation facilities.

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 ☒

b) No Impact. The project would not include recreation facilities nor require the construction of new recreation facilities which might have an adverse effect on the environment.

XV. TRANSPORTATION/TRAFFIC

Setting

Walter Street borders the project site on the east. The street has curbs and gutters with sidewalks on some parcels, but not in front of the ILA site. Entry to the site is available via paved access driveways on the east and west sides of the property. On-street parking is allowed and off-street parking is provided at all surrounding businesses.

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 ☐

a) Less than Significant Impact. During construction of the proposed project, workers would be commuting to the site for approximately three months. The average number of commuting workers is

expected to be seven. Occasionally, trucks would deliver equipment and materials to the site as well as haul construction debris from the site to recycling centers or landfills. During the operational phase of the project, one or two service persons would visit the site approximately once a week. The project would cause a negligible increase in traffic. Therefore, potential impacts are less than significant.

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 ☒

b) No Impact. The limited project traffic would not result in a measurable increase in traffic congestion.

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 ☒

c) 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 ☒

d) No Impact. Access to the proposed site would be via existing driveways. No changes to the site design are proposed.

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

e) Less than Significant With Mitigation Incorporation. The fiber optic cable feed to the ILA will be from the railroad ROW located approximately 900 linear feet from the south side of the site. Emergency access along these roads could be affected during construction activities. The loss of a lane and the resulting increase in congestion could lengthen the response time required for emergency vehicles passing through the construction zone. Moreover, there is a possibility that emergency services may be needed at a location where access is temporarily blocked by the construction zone. This potential impact is considered less than significant with the following additional mitigation measure incorporated.

- At locations where access to nearby property is blocked, provision shall be ready at all times to accommodate emergency vehicles, such as plating over excavations, short detours, and alternate routes. (Mitigation Measure 15-XV-1)

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

f) No Impact. The project site has an off-street parking area along the east and west sides of the building, and two paved access driveways, which are accessible on the east and west sides of the building. 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 ☒

g) No Impact. The City of Ventura General Plan Circulation Element contains policies supporting alternative transportation. None of the local policies for alternative transportation would apply to the project, and the proposed project would not conflict with the applicable policies for alternative transportation (PEA, 2000, p. 15-33).

XVI. UTILITIES AND SERVICE SYSTEMS

Setting

The project site is developed with an industrial building and is located in a developed industrial area. All utilities and service systems are available on-site. All utilities are underground in the project area. Manholes and utility access boxes are visible along Walter Street 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 ☐

a) Less than Significant Impact. The proposed site has existing restroom facilities; however, wastewater generation would be less than significant since the facility would be unmanned. The proposed site would not exceed the wastewater requirements of the applicable Regional Water Quality Control Board.

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 ☒

b) No Impact. The proposed facility would use an existing building with all utilities and service systems available on-site. There would be a minimal amount of wastewater produced during operation since it would be an unmanned facility. The site would not require the construction or expansion of water or wastewater treatment 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 ☒

c) No Impact. The proposed facility would reuse an existing site with minimal construction and water use. The facility would not require construction or expansion of storm 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 ☒

d) No Impact. The proposed site would use an existing building with all utilities and service systems available on site. There would be sufficient water supplies for the minimal water use occurring on-site.

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 ☐

e) Less than Significant Impact. Service personnel would use existing restroom facilities approximately once or twice a week. The local wastewater treatment provider could adequately serve the minimal amount of wastewater that would be generated on-site.

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

f) Less than Significant Impact. The proposed facility would involve the reuse of an existing building so there would be minimal waste generation during construction. In addition, solid waste generation during facility operation would be minimal since it would be an unmanned facility. The site's solid waste disposal needs could be served by the Toland Road Sanitary Landfill, which is permitted by the State of California.

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 ☒

g) No Impact. The project would not generate a significant amount of solid waste. Landfills where waste would be deposited would be in compliance with applicable solid waste laws. The project would comply with applicable solid waste laws.

REFERENCES

Field reconnaissance. February 2, 2000.

Level 3 Communications, LLC. 2000. PEA, 2000, Volume 2.

San Buenaventura, City of. 1989. Comprehensive Plan - Update to the Year 2010.

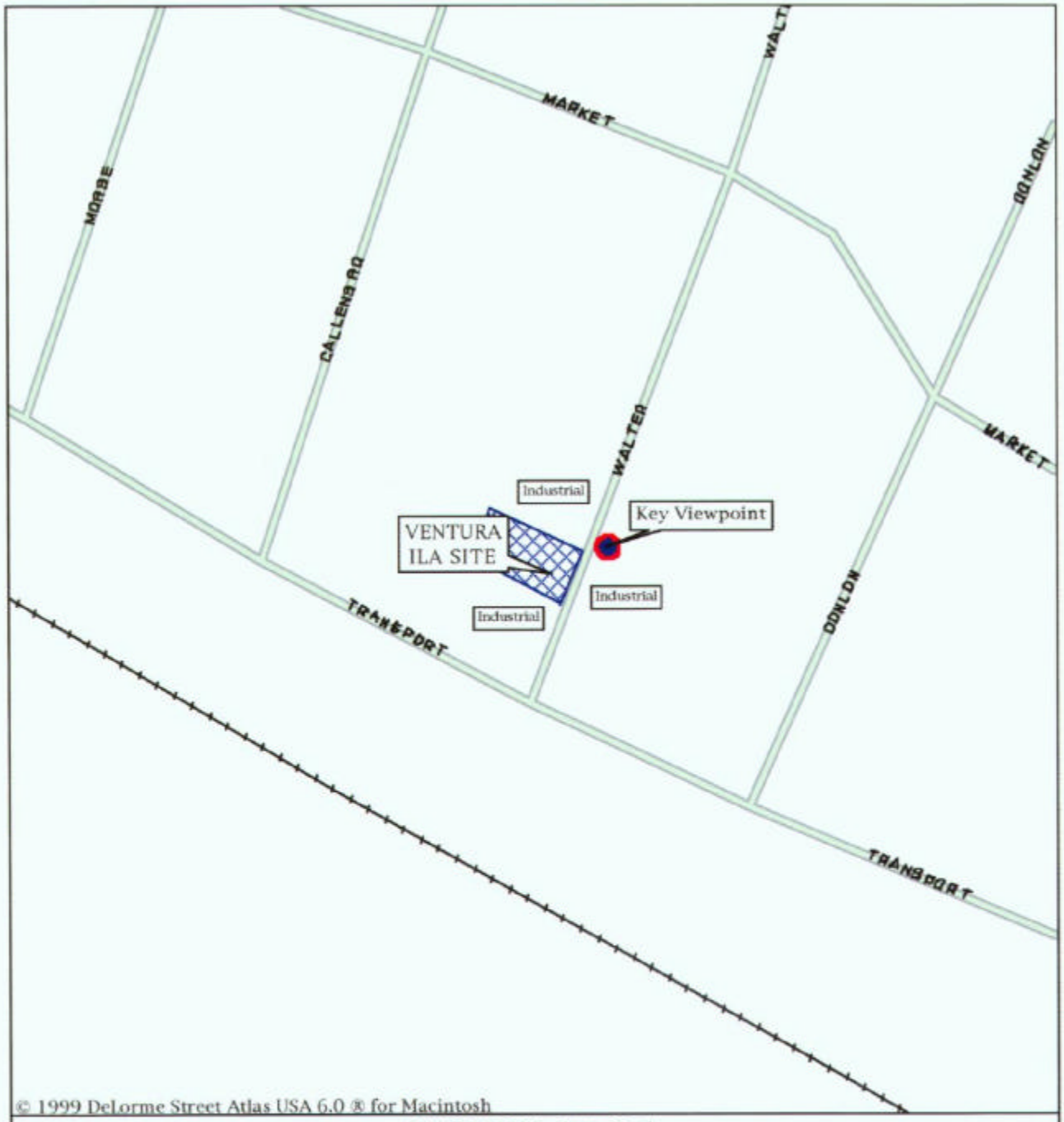

FIGURE 15-I-1

Mag 17.00
Fri Feb 25 21:47 2000
Scale 1:3,906 (at center)
200 Feet
100 Meters

Local Road
Interstate/Limited Access
Railroad

Level 3 Communications Infrastructure Project	**Figure 15-I-2 Ventura ILA**	View to the southwest from the east side of Walter Street in the City of Ventura. The proposed ILA facility would be located within the existing building, at 1667 Walter Street, shown in the above photo.

VISUAL ANALYSIS DATA SHEET

KEY VIEWPOINT DESCRIPTION

LEVEL 3 SITE NO.
15
PROJECT COMPONENT
Ventura ILA
VIEWPOINT LOCATION
East side of Walter Street viewing to the southwest, toward the existing building proposed to accommodate the ILA at 1667 Walter Street.
ANALYST
Michael Clayton
DATE
2/5/00

VISUAL QUALITY

[X] **Low** [ ] **Moderate** [ ] **High**	Views of the site encompass a foreground urban setting of commercial and office development, paved surfaces, and infrastructure. Overall visual quality of this complex landscape is considered **low to moderate.**

VISUAL ABSORPTION CAPABILITY

The site is already developed with a structure within which the proposed ILA is proposed to be located. Therefore, visual absorption capability is considered **high**.

VIEWER SENSITIVITY

Viewer expectations for the immediate project vicinity are for an urban environment with commercial/industrial character. The proposed project will not change the existing foreground visual character of the project site or viewer expectations. Overall viewer sensitivity is rated **low**.

VIEWER EXPOSURE

Visibility: High	**Duration of View:** Brief to Moderate
Distance Zones: [FG: 0-0.5mi.; MG: 0.5-4mi.; BG: 4mi.-horizon] Foreground	**Overall Viewer Exposure:** **Moderate** - resulting from high visibility, low traffic volumes, and brief to moderate duration of views.
Numbers of Viewers: Low to Moderate	

VISUAL IMPACT SUSCEPTIBILITY

[X] **Low** [ ] **Moderate** [ ] **High**	Although visual quality, viewer sensitivity, and viewer exposure are rated low to moderate, visual absorption capability is high. Minimal changes to the existing building exterior will not result in an increase in visual contrast and the changes will not be particularly noticeable to passing motorists or other business occupants on Walter Street. Therefore, visual impact susceptibility is rated **low**.

(over)

Level 3 Site No. 15 Viewpoint
(continued)

VISUAL CONTRAST RATING

CHARACTERISTIC LANDSCAPE DESCRIPTION			
	LAND/WATER BODY	**VEGETATION**	**STRUCTURES**
FORM	Level	Prominent, well-defined blocks	Prominent, geometric
LINE	Horizontal	Horizontal to irregular	Vertical, horizontal to diagonal
COLOR	Indistinct (developed site)	Green	White, grey, blue
TEXTURE	Indistinct (developed site)	Smooth to coarse	Smooth to coarse

PROPOSED ACTIVITY DESCRIPTION			
	LAND/WATER BODY	**VEGETATION**	**STRUCTURES**
FORM	Same	Same	Same
LINE	Same	Same	Same
COLOR	Same	Same	Same
TEXTURE	Same	Same	Same

DEGREE OF CONTRAST

	LAND/WATER BODY				VEGETATION				STRUCTURES			
	NONE	LOW	MODERATE	HIGH	NONE	LOW	MODERATE	HIGH	NONE	LOW	MODERATE	HIGH
FORM	√				√				√			
LINE	√				√				√			
COLOR	√				√				√			
TEXTURE	√				√				√			

TERM: ☑ Long ☐ Short

CONTRAST SUMMARY: ☑ None ☐ Low ☐ Moderate ☐ High

PROJECT DOMINANCE

Subordinate ☐ **Co-Dominant** ☑ **Dominant** ☐

VIEW IMPAIRMENT

None ☑ **Low** ☐ **Moderate** ☐ **High** ☐

VISUAL IMPACT SIGNIFICANCE

Potentially Significant Impact	Less than Significant With Mitigation	Less than Significant Impact	No Impact
☐	☐	☐	☑