# Site 16. MOORPARK ILA

# Environmental Checklist

# ENVIRONMENTAL CHECKLIST

**1. Facility Title:**
Level 3 Communications Infrastructure Project, Moorpark ILA

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

**3. Contact Person and Phone Number:**
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 5245 Kazuko Court , near the intersection of Kazuko Court and Tejeda Street in the City of Moorpark, Ventura County, California. The site is approximately 0.60 acre in size and is developed with an approximately 15,000 square feet concrete tilt-up industrial building. It contains a paved parking area along the northern edge, and landscaping at the front (east) entrance along Kazuko Court. Access to the site is on either side of the building (north or south) via paved access drives which run along the north and south property lines. A site vicinity map is provided as Figure 16-1. A plot plan of the site is provided as Figure 16-2. Additional site maps and detail are available in the PEA (PEA, 2000, following p. 16-40).

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

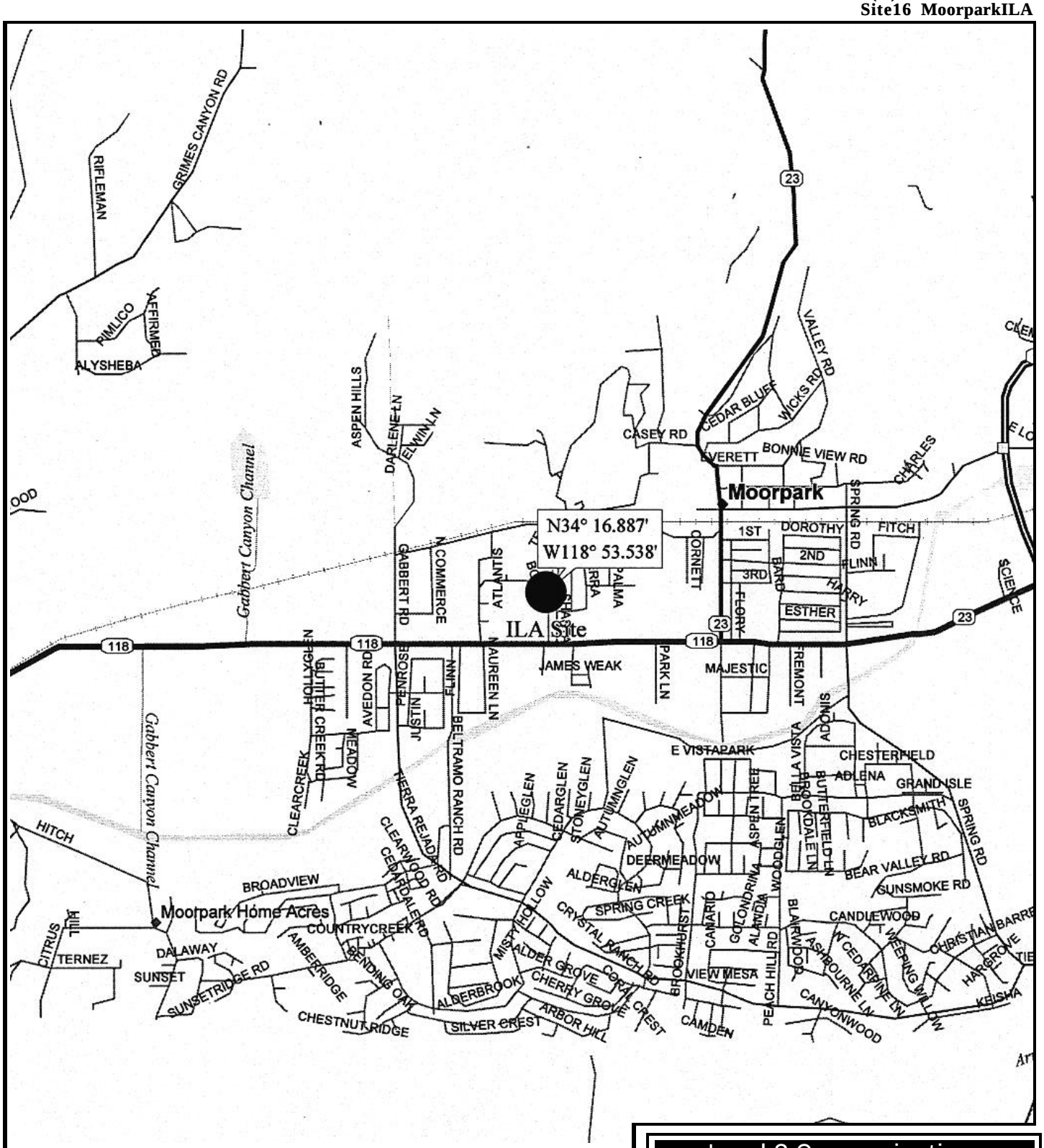
**6. General Plan Designation:** Light Industrial (I-1)

**7. Zoning:** Industrial Park (M-1)

**8. Description of Facility:**
This checklist evaluates the design, construction, and operation of the Moorpark ILA, which will be located outside of an existing utility corridor.

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

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




Source: PEA,2000

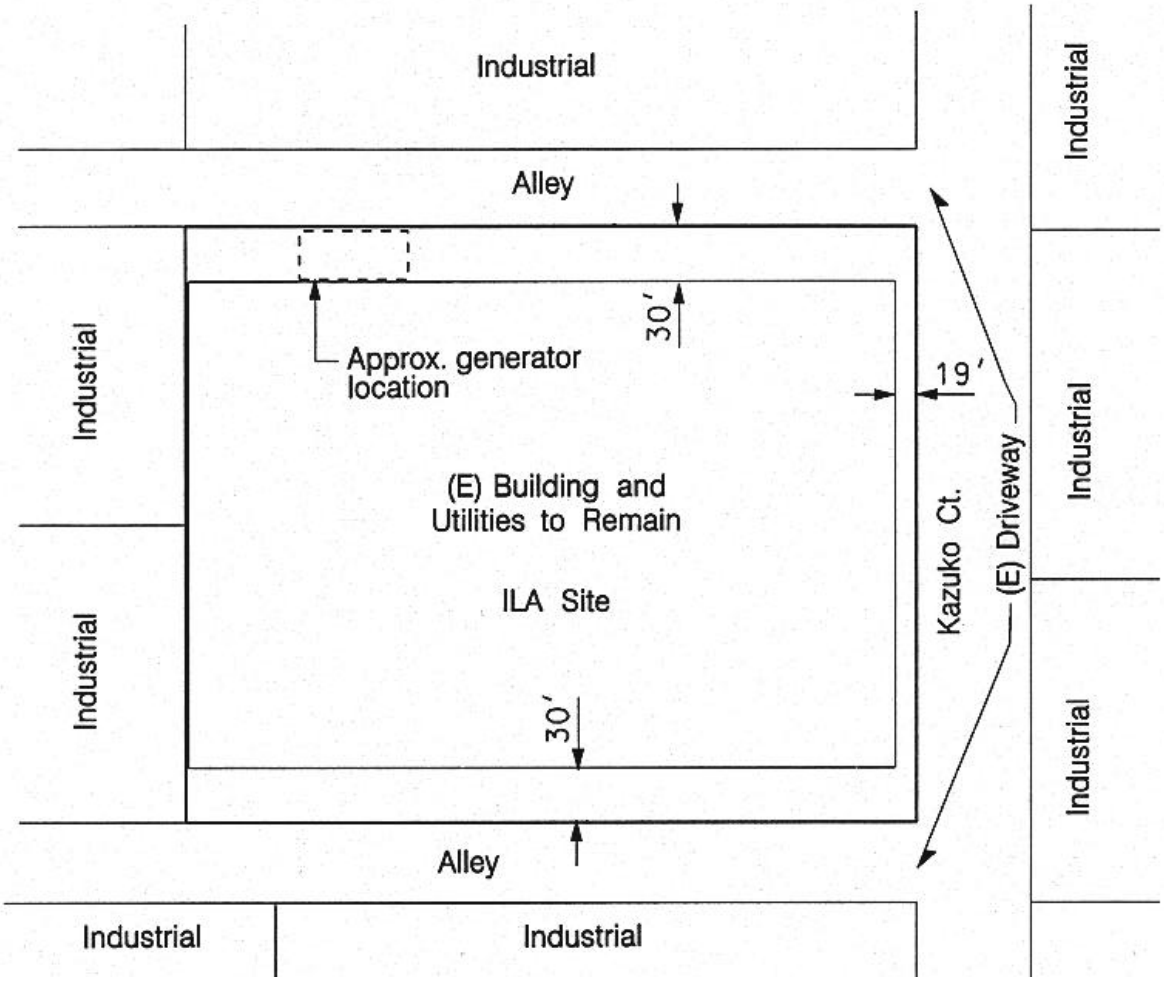
## Level 3 Communications Infrastructure Project

Figure 16-1

**MoorparkILA**
**Site Vicinity Map**

*Aspen*
*EnvironmentalGroup*

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 16-2

**MoorparkILA Conceptual Plot Plan**

*Aspen* *EnvironmentalGroup*

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

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

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

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

Figure 16-2 is a conceptual plot plan of the Moorpark ILA site showing required setbacks and locations of utility and vehicle access. The area bounded by the setbacks is the "development window" within which the present building is situated. The precise location of the ILA interior electronics will be determined during the engineering design phase of the project.

There will be no site development including no grading for placement of the generator shelter or for access and parking. Upgrading of the generator foundation will be engineered and completed prior to delivery of prefabricated components (i.e., shelter placement), placement of the fiber optic cable line, and installation of utility connections. Erection of any additional perimeter fencing will occur prior to all improvements. The fiber optic cable feed to the ILA will be from the railroad ROW, which is located approximately 2,700 linear feet from the building, via roadways. The running line will enter the building from the railroad ROW south of the property utilizing Gabbert Road, State Highway 118, Maureen Lane, Hertz Road, and Bonsai Street, and will run back to the railroad ROW utilizing Kazuko Street, Tejeda Avenue, Goldman Avenue, State Highway 118, Shasta Avenue, and Sierra Avenue. The connection to the ILA facility will be installed at a depth of approximately 42 inches either by plowing in the conduit (which does not require a trench) or by digging a trench, laying the conduit, and back-filling.

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

During operation at 100-percent load, the 449-hp generator consumes approximately 22 gallons of diesel fuel per hour (gph). At 75 percent load, fuel consumption rate is 16.5 gph. During most of the 30 minutes of testing and maintenance run time each week, the generators will run at 50-percent load. However, for the purpose of this "worst-case" calculation, 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. 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. 16-2). 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. The site will be visited approximately once a week for routine maintenance, data downloading, and fuel tank filling (assumed for analysis purposes to be 60 trips per year).

Current and potential cumulative projects in the vicinity of the proposed Moorpark ILA site are provided in Table 16-1 of the PEA (PEA, 2000, follows p. 16-40). The criteria used for the cumulative impacts analysis includes:

- 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 -related 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 16-1 of the PEA indicates that 10 current projects are located within 2 miles of the project site, and 9 future projects are located within 2 miles of the project site. Current projects listed in the table include a broad range of development, including residential, commercial, industrial, business, and service uses. Future projects include residential, industrial, recreational, and business park uses.

**9. Surrounding Land Uses and Environmental Setting:**

All surrounding land uses are industrial in nature. Resource-specific baseline settings are provided in Section I – XVI of this checklist.

**10. Other Agencies Whose Approval is Required:**

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

The project is located in the M-1 zoning district. Public Utility Facilities and Communications Facilities are permitted in the M-1 zone subject to a Planning Commission approved Conditional Use Permit (PEA, 2000, p. 16-3).

Specific local policies relevant to each of the sixteen environmental impact issue areas are provided in Table 16-2 of the PEA (PEA, 2000, follows p. 16-40). 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 an Application for Modification of an existing Certificate of Public Convenience and Necessity (CPCN) (Decision No. 98-03-066). That CPCN was supported by a Mitigated Negative Declaration that included mitigation measures to be implemented in the design, construction and operation of the previously approved telecommunications facilities within existing utility ROW. The project will incorporate all of 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 at the end of this Site 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 16-I-1 shows the location of the Key Viewpoint from which the Visual Analysis Data Sheet was developed. Figure 16-I-2 shows the view from the Key Viewpoint. These figures are found at the end of this Initial Study. Also, see PEA Photos 16-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 Kazuko Court.

| | | | | | |
|---|---|---|---|---|---|
| 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 light industrial 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 "Light Industrial" and the Zoning designation is "Industrial Park." The site does not hold any special agricultural designations and is not currently used for agricultural purposes. The site currently contains a 15,000 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 (ROC's) 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 16-III-1 (PEA, 2000, Table 16-3, follows p. 16-40). These resulting emissions are 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 project construction phase (Table 16-III-1**)**. The only expected construction activity at this site is the preparation of a 300-square-foot area for the emergency generator enclosure. Fugitive dust generation would vary from day to day depending on the level and type of activity (e.g., trenching activities, grading, and vehicular traffic bringing materials to the site), the silt content of the soil (during trenching and grading activities), and the weather. Fugitive dust 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 would be negligible.

Generator testing and vehicle trips from visiting technicians would contribute operational air emissions as shown in Table 16-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 no more than 50 hours per year calendar year for maintenance purposes, and would be subject to documentation requirements.

Normal operations 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 will take the following actions:

- 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.

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

- On-site vehicle speed will be limited to 15 miles per hour.

- Use of petroleum-based dust palliatives, if necessary**,** will meet the road oil requirements of VCAPCD Rule 74.4 (Cutback Asphalt).

- 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.

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:

# TABLE 16-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 | 200.00 | 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 | 153.00 | 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 | 117.00 | 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 | 175.00 | 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 (272 cu.yds.)** | | | | | | | | | | | | | | | | | | | | | |
| Semi-end Dump Trucks | 20 ton | 3 | 3 | - | 100 | 11.3 | 14.9 | 0.0223 | 2.2 | 2.9 | 0.0044 | 0.59 | 0.78 | 0.0012 | 0.31 | 0.41 | 0.0006 | 14.0 | 18.6 | 0.0279 | 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)** | | | | | | | 16.5 | 0.0247 | | 3.5 | 0.0052 | | 0.78 | 0.0012 | | 0.51 | 0.0008 | | 30.0 | 0.0450 | |
| **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 | 84.00 | 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 | | 1.1 | 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 | 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] | | | | | | | 16.5 | 0.1330 | | 3.5 | 0.0168 | | 0.78 | 0.0036 | | 1.1 | 0.0082 | | 30 | 0.1043 | |
| **Total Construction Emissions (Fugitive plus exhaust)** | | | | | | | | 0.1330 | | | 0.0168 | | 13.2 | 0.1321 | | | 0.0082 | | | 0.1043 | |
| **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 | 10.5 | 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] | | | | | 12.4 | 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 | 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 |
| | (300 KW) | | | | | | | | | | | | | | | | | | | | |
| 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$^0$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.

All material excavated will be sufficiently watered to prevent excessive amounts of dust. Watering will occur at least twice daily with complete coverage, preferably in the late morning and after work is done for the day.

- All material transported off site will be either sufficiently watered or securely covered to prevent excessive amounts of dust.

- Face masks will be used by all employees involved in grading and trenching operations during dry periods to reduce inhalation of dust. Dust may contain the fungus that causes San Joaquin Valley Fever.

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 16-III-1. There are no numerical thresholds for fugitive dust (PM10) 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 once a week. Emissions based on manufacturer estimates on a given day when the engine would undergo such a test, are presented in Table 16-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 nonattainment under an applicable federal and state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)? | Potentially Significant Impact ☐ | Less than Significant with Mitigation Incorporation ☐ | Less than Significant Impact ☒ | No Impact ☐ |

c) Less Than Significant Impact. The Moorpark ILA site is one of two PEA sites in Ventura County under the jurisdiction of the VCAPCD (the other being the Ventura ILA site). Potential 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, the applicant has committed to limiting construction to one Ventura County site at a time to avoid significant impacts on $NO_x$ concentrations.

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.

| | | | | | |
|---|---|---|---|---|---|
| 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 site is approximately 300 feet to the northeast.

Project construction except for trenching and limited grading activities would take place primarily within an existing building; therefore, receptors associated with surrounding uses would be buffered from the effects of project construction (see Figure 16-2). 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 (the nearest sensitive receptor is 300 feet to the northeast). 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 conditions for supporting biological resources are poor both onsite and in the vicinity. The vegetation present onsite is limited to ornamental non-native species. The site itself is a concrete commercial structure and is located within completely developed commercial setting. The perimeter and surrounding areas are paved with the exception of the landscaped sites. The roof of the building is flat with no decent habitat (for nesting or foraging) for raptor species. The landscaped trees located on site may be suitable for raptor perching; however, no foraging habitat occurs in the immediate vicinity. No wildlife species were observed during the survey. Plant species observed during the field survey were gingko tree (~~*Gingko biloba*~~), fesque (~~*Festuca*~~ sp.), and pine tree (~~*Pinus*~~ sp.).

### Evaluation

| | | | | | |
|---|---|---|---|---|---|
| a) | Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? | Potentially Significant Impact ☐ | Less than Significant with Mitigation Incorporation ☐ | Less than Significant Impact ☐ | No Impact ☒ |

a) No Impact. The site consists of a concrete building located within a completely developed urban setting. No habitat exists onsite for any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service (the site exhibits poor habitat for nesting or foraging raptor species). It is highly unlikely that the site is utilized by any species mentioned above, therefore the project is not expected to result in any impacts to such species. A list of sensitive species that could potentially occur on the present site was created based upon a California Natural Diversity Database Search for the Moorpark Quadrangle (California Department of Fish and Game, March 2000) and knowledge of the project area. Table 16-IV-1 includes these species and their potential for occurrence on site.

| | | | | | |
|---|---|---|---|---|---|
| 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. 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.

**Table 16-IV-1**
**Potential for Habitat at the Moorpark ILA Site to Support Sensitive Species Occurring in the Vicinity**

| |
|---|
| The Plummer's mariposa lily (*Calochortus plummerae*), a federal species of concern, and has a CNPS listing of 1B. It is a perennial herb blooming between May and July. It typically occurs on rocky and sandy sites, usually of granitic or alluvial material, within coastal scrub, chaparral, valley and foothill grassland, and lower montane coniferous forest communities.<br><br>*This site is entirely developed and lacks suitable habitat for Plummer's mariposa lily.* |
| The Santa Ana sucker (*Catostomus santaanae*) is a federally proposed threatened and a California state species of concern. It is endemic to south coastal streams of the Los Angeles basin. They can be found in a variety of aquatic habitats, but prefer sand-rubble-boulder bottoms with clear water and algae-covered surfaces.<br><br>*This site has no aquatic habitat for the Santa Ana sucker.* |
| The San Diego desert woodrat (*Neotoma lepida intermedia*) is a federal species of concern and a California state species of concern. It is particularly abundant in rock outcrops and rocky cliffs and slopes of coastal southern California from San Diego County to San Luis Obispo County. They prefer moderate to dense vegetation canopies.<br><br>*This site has no appropriate habitat for the San Diego desert woodrat.* |

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

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

d) No Impact. The site and the immediate surroundings are paved and developed. Because the site is void of natural habitat and highly unlikely to support native species, it is not expected to serve as any component of a migratory wildlife corridor or native wildlife nursery. Therefore, the proposed project is not expected to interfere with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

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

e) No Impact. The City of Moorpark Tree Ordinance covers all trees within the city. Any tree taller than 4 inches requires a permit to be removed. The County of Ventura has a tree ordinance that covers oaks and sycamores. Trees of any species that are 30 inches or more in diameter are also protected under the ordinance. No trees are expected to be removed as a result of the proposed project; therefore

the project is expected to have no conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

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

f) No Impact. Neither the City of Moorpark nor the County of Ventura has an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Due to the absence of applicable local and regional conservation plans, and the urban setting in which the project site is located, the project is not expected to conflict with any conservation plan mentioned above.

## V. CULTURAL RESOURCES

### Setting

The project site is located in the Little Simi Valley in the coastal foothills of Ventura County. The property at 5245 Kazuko Court is in the City of Moorpark between Los Angeles Avenue and the Union Pacific Railroad. A recently built commercial/warehouse structure occupies about 15,000 square feet of this 0.60-acre site and the rest of the parcel is paved. 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 been previously surveyed (File No. 8030a) and that there are no previously recorded prehistoric and historic archaeological sites within one mile of the project. 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 building on the project parcel was constructed in 1988 and 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) by Dibblee (1992). No fossil localities are recorded at the project site or elsewhere in the Moorpark 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. 16-17).

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

Paleontological monitoring will be initiated 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 Impacts. The CHRIS records search and field survey provided no evidence of the presence of human remains (File No. 8030a). 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 proposed Moorpark ILA site is in the southeast portion of the City of Moorpark. The proposed site is in the Little Simi Valley, a southwest trending valley bounded on the north by South Mountain and on the south by the Simi Hills. Arroyo Simi, tributary to the Santa Clara River, drains the valley and flows in a southwest direction along the northern base of the Simi Hills. The Moorpark site is underlain by alluvial deposits consisting of silt, sand and gravel and attains a thickness of approximately 200 feet. These deposits unconformably overlie sands and gravel of the Pleistocene age Saugus Formation.

The project site is within a seismically active region. The site is not located within an Alquist-Priolo Special Study Zone. Principal faults that may generate significant seismic shaking include the Ventura-Pitas Point fault, San Cayetano fault, Oak Ridge fault, Santa Susana fault, the Simi-Santa Rosa fault, and the San Andreas fault. The Ventura-Pitas Point, Oak Ridge, San Cayetano and San Andreas faults have demonstrated Holocene activity (CDMG, 1999). The Simi-Santa Rosa fault is also considered active (CDMG, 1997). The project is not located within a landslide or subsidence geologic hazard area (CDMG, 1997).

Based on a study by the California Division of Mines & Geology, the site is located within an area considered to have liquefaction potential (CDMG, 1997). Groundwater levels are reported to be shallow near Arroyo Simi and expected to be 20 to 30 feet below ground surface (bgs) at the site. The site has moderate erosion potential and moderate to highly expansive soils (CDMG, 1973).

### Evaluation

| | | | | | |
|---|---|---|---|---|---|
| a) | Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:<br>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.<br>ii) Strong seismic-related groundshaking?<br>iii) Seismic-related ground failure, including liquefaction?<br>iv) Landslides? | Potentially Significant Impact<br>☐ | Less than Significant with Mitigation Incorporation<br>☐ | Less than Significant Impact<br>☐ | No Impact<br>☒ |

a) No Impact. The project site is not located within an Alquist-Priolo zone (CDMG, 1999). The site is in an area with liquefaction potential (CDMG, 1997). The project area is susceptible to severe to moderate magnitude ground shaking (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), 6 miles;
- San Cayetano, 9 miles;
- Santa Susana, 9 miles;
- Simi –Santa Rosa, 1 mile;
- Ventura-Pitas Point, 15 miles; and
- San Andreas, 35 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 located 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 moderate erosion activity (CDMG, 1973). The existing structure at the site and surrounding pavement area should prevent soil erosion or loss of topsoil as a result of the project.

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

c) No Impact. The project site is relatively flat and is not 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 to highly 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).

## VII. HAZARDS AND HAZARDOUS MATERIALS

### Setting

The area is fully developed, with land use comprising industrial operations. Review of a database of regulatory agency recognized hazardous waste sites revealed no potentially contaminated sites at or within one mile of the Moorpark project site (Vista, 1999). No schools are within one-quarter mile of the site, and the project is not in the vicinity of an airport or within an airport safety zone. Fuel for the standby generator would be stored in an aboveground storage tank on site.

## 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. The project area is in an industrial area and 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 airport or public use airport.

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

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. Redevelopment of this site for use as an ILA facility would not alter, impair, or interfere with adopted emergency response and evacuation plans.

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|---|---|---|---|---|---|
| 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 site is in an urbanized industrial area and would not be subject to wildland fires.

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

## VIII. HYDROLOGY AND WATER QUALITY

### Setting

The facility is to be constructed on an existing concrete pad. The site is not located within a 100-year floodplain, but is within the 500-year floodplain limits (PEA, 2000, Figure 16-9).

Level 3 has already committed to taking the following actions will be taken 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.

Level 3 has already committed to submitting a Notification of Intent (NOI) 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

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|---|---|---|---|---|---|
| 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.

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|---|---|---|---|---|---|
| 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 that 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 on the concrete pad of 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 expected.

| | | | | | |
|---|---|---|---|---|---|
| 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 that 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 on the concrete pad of 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 expected.

| | | | | | |
|---|---|---|---|---|---|
| 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. The project involves construction on the concrete pad of 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) No 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 that 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 16-9).

| | | | | | |
|---|---|---|---|---|---|
| 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 risk of flooding is present at the project (the site is within the 500-year floodplain, PEA, 2000, Figure 16-9), but people would be present only during project construction and maintenance, and therefore the risk of injury or death is 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 from seiche, tsunami, or mudflow (PEA, 2000, p.16-24).

## IX. LAND USE PLANNING

### Setting

The proposed site is located at 5245 Kazuko Court in the City of Moorpark. The general project vicinity is urban with a mix of industrial, commercial, and office development. The 0.60-acre site is occupied by a 15,000 square-foot concrete tilt-up industrial building that is proposed to be renovated for occupancy by the ILA. The site is bordered by Kazuko Court on the east, with light industrial uses on the south, west, and north. Light industrial uses are also located across Kazuko Court on the east.

See Figure 16-1 in this Initial Study and PEA Figures 16-1 through 8 for detailed locator and site vicinity maps.

The General Plan land use designation for the project site is "Light Industrial" while the Zoning designation is "Industrial Park." Public utilities and communications facilities are permitted under the Light Industrial zoning designation subject to approval of a Conditional Use Permit. 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 16-1 in this Initial Study and PEA Figures 16-5, 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 its 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 "Light Industrial" while the Zoning designation is Industrial Park. The proposed project could be permitted as a utility or communications facility under the "Industrial Park" 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 site is not in an area designated by the State or City of Moorpark for known mineral resources (PEA, 2000, p. 16-25).

### 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

The nearest receptors are industrial uses to the north and west of the proposed ILA site. The closest residence to the ILA site is approximately 300 feet away. The site is not close to an airport and is not within an airport land use plan. There are no private airports near the site.

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

### 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 the period between 7 am and 7 pm, Monday through Saturday. Because no numerical thresholds for construction-related noise apply during these time intervals, potential impacts during construction are less than significant. In addition, the project would use existing and prefabricated structures and the construction period would be brief, approximately two months long, which would further reduce construction related impacts.

The emergency generator would be the main source of operational noise at the facility. A noise-insulating shelter would be used to reduce noise levels to 75 dBA at 5 feet from the shelter. The shelter would be set back at least 15 feet from all property lines. The resulting noise level at the property line

would be 65 dBA during generator operations, which would comply with both the continuous and 30 minute per hour noise limits for Industrial Park-zoned property in Moorpark, as discussed above.

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

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

| | | | | | |
|---|---|---|---|---|---|
| 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) No 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 work area. This work area would be set back 15 feet from all property lines. Therefore, there would be a less than significant impact from groundborne vibrations or noise during construction.

With regard to operations, the emergency generator would be the only potential source of groundborne vibration. However, the generator would be mounted on a concrete pad and would have a minimum of 4 vibration isolators, which would significantly reduce groundborne vibration. The buried fiber optic cable would not generate any perceptible vibrations or noise. Consequently, there would be no excessive ground borne vibration or noise impacts associated with site operations.

| | | | | | |
|---|---|---|---|---|---|
| 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 approximately two months of construction but these levels would not be significant and would comply with the local construction noise ordinance.

With regard to project operations, the emergency generator would operate during weekly test for periods of approximately 30 minutes and during power outages, and some minor maintenance activities would generate periodic noise. This periodic noise would not be a substantial increase in ambient noise

levels because the distance from the boundary with the nearest industrial facility would create a buffer area around the generator and the location and enclosure of the generator would comply with noise regulations.

| | | | | | |
|---|---|---|---|---|---|
| e) | For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? | Potentially Significant Impact ☐ | Less than Significant with Mitigation Incorporation ☐ | Less than Significant Impact ☐ | No Impact ☒ |

e) No Impact. The site is not located within an airport land use plan.

| | | | | | |
|---|---|---|---|---|---|
| f) | For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels? | Potentially Significant Impact ☐ | Less than Significant with Mitigation Incorporation ☐ | Less than Significant Impact ☐ | No Impact ☒ |

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 Moorpark, with a population 29,324 (PEA, 2000, p. 16-28). The project site is developed with one industrial building and is located in a developed industrial area. The nearest housing is located along Shasta Avenue, approximately 300 feet from the project site. There are no local policies for population and housing that apply to the project site.

### Evaluation

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|---|---|---|---|---|---|
| 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 project would consist of the reuse of an existing industrial building. The project would be unstaffed, and would not induce new employment. No new housing or extension of major infrastructure would result. Consequently, the project would not result in any growth-inducing effects.

| | | | | | |
|---|---|---|---|---|---|
| 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 impacts. The project would involve the reuse of an existing industrial building as an unmanned ILA station. The project would not involve the displacement of any residential units. Therefore, no replacement housing would be necessary.

| | | | | | |
|---|---|---|---|---|---|
| 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 and would not displace any people. No replacement housing would therefore be necessary.

## XIII. PUBLIC SERVICES

### Setting

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

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

### Evaluation

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|---|---|---|---|---|---|
| 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:<br>Fire protection?<br>Police protection?<br>Schools?<br>Parks?<br>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. 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 parks near the project site, however, the Moorpark 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: Poindexter Park (approximately one-quarter mile east) and Arroyo Vista Community Park

(approximately one-half mile south). 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 that might have an adverse effect on the environment.

## XV. TRANSPORTATION/TRAFFIC

### Setting

Kazuko Court borders the project site on the east. The project site is connected to Bonsai Avenue via two paved access driveways that run east and west between Kazuko Court and Bonsai Avenue.

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

### Evaluation

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|---|---|---|---|---|---|
| a) | Would the project cause an increase in traffic that 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, approximately 7 workers would be commuting to the site for approximately three months. 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.

| | | | | | |
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| 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.

| | | | | | |
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| 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 proposed ILA site would enter the building from the railroad ROW south of the property utilizing Maureen Lane, Hertz Road, and Bonsai Street. 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 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 16-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. Parking spaces would be provided on-site to accommodate vehicles used in periodic maintenance visits.

| | | | | | |
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| 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. There are no alternative transportation facilities located in the proposed project vicinity. The workaround would not conflict with any adopted policies, plans, or programs supporting alternative transportation.

## XVI. UTILITIES AND SERVICE SYSTEMS

### Setting

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

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

### Evaluation

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

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

| | | | | | |
|---|---|---|---|---|---|
| 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. 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.

| | | | | | |
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| 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 Simi Valley Landfill and Recycling Center 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

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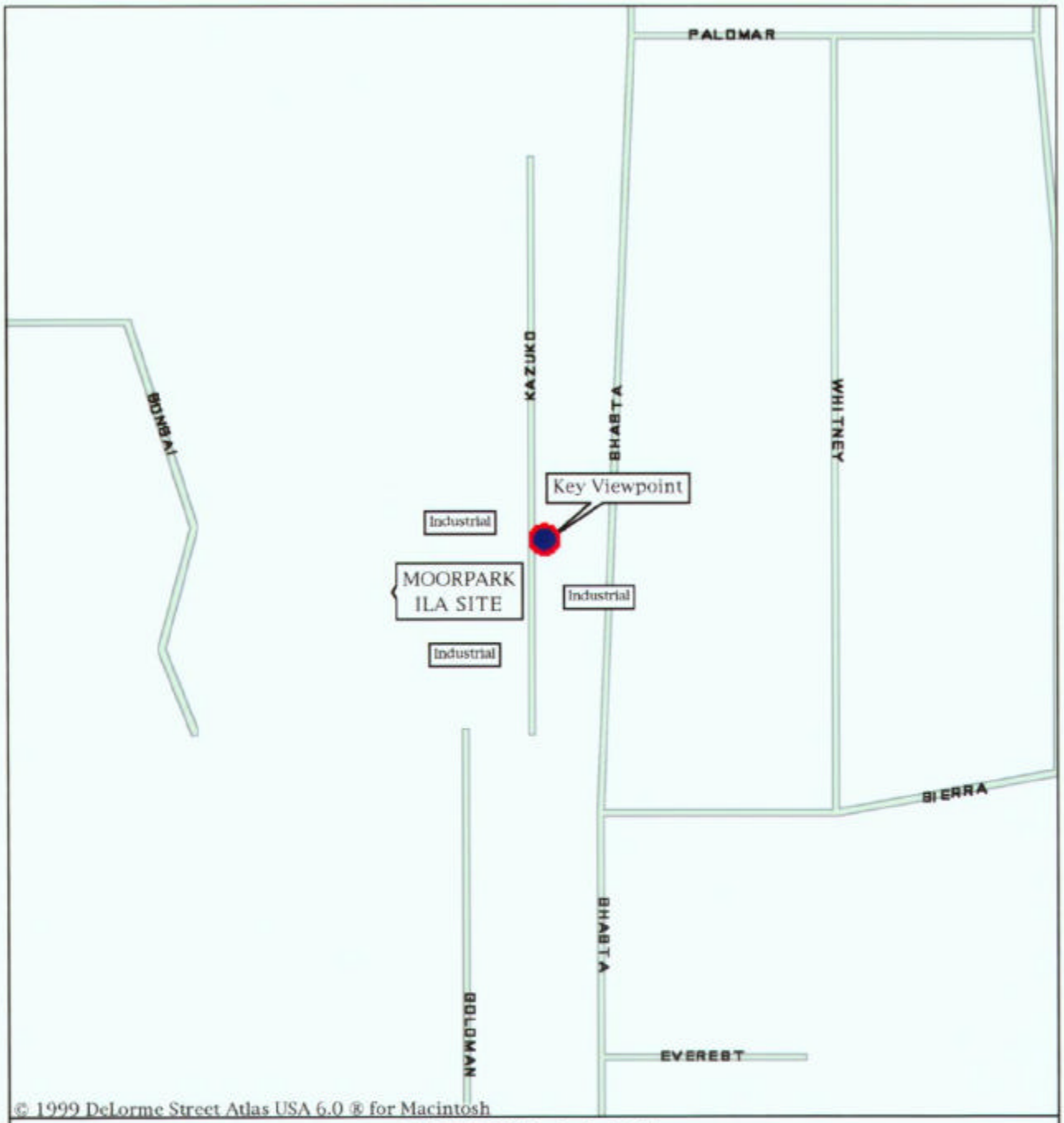


# FIGURE 16-I-1

Mag 18.00
Mon Mar 06 16:04 2000
Scale 1:1,953 (at center)
200 Feet
50 Meters

Local Road

| Level 3 Communications Infrastructure Project | **Figure 16-I-2 Moorpark ILA** | View to the southwest from the east side of Kazuko Court in the City of Moorpark. The proposed ILA facility would be located within the existing building (at 5245 Kazuko Court) shown in the above photo. |
|---|---|---|

# VISUAL ANALYSIS DATA SHEET

## KEY VIEWPOINT DESCRIPTION

| LEVEL 3 SITE NO. |
|---|
| 16 |
| **PROJECT COMPONENT** |
| Moorpark ILA |
| **VIEWPOINT LOCATION** |
| East side of Kazuko Court viewing to the southwest, toward the existing building proposed to accommodate the ILA at 5245 Kazuko Court. |
| **ANALYST** |
| Michael Clayton |
| **DATE** |
| 2/5/00 |

## VISUAL QUALITY

| | |
|---|---|
| [X] **Low**<br>[ ] **Moderate**<br>[ ] **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]<br>Foreground | **Overall Viewer Exposure:**<br>**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**<br>[ ] **Moderate**<br>[ ] **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 Kazuko Court. Therefore, visual impact susceptibility is rated **low**. |

*(over)*

## Level 3 Site No. 16 Viewpoint
(continued)

## VISUAL CONTRAST RATING

| CHARACTERISTIC LANDSCAPE DESCRIPTION | | | |
|---|---|---|---|
| | LAND/WATER BODY | VEGETATION | STRUCTURES |
| FORM | Level | Indistinct to prominent, well-defined blocks | Prominent, geometric |
| LINE | Horizontal | Horizontal to irregular | Vertical, horizontal to diagonal |
| COLOR | Indistinct (developed site) | Green | Grey, tan, 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 |
|---|---|---|---|
| ☐ | ☐ | ☐ | ☑ |