Interlake Tunnel and Spillway Modification Project

Initial Study

April 2016

Monterey County Water Resources Agency
893 Blanco Circle
Salinas, CA 93901

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A. PROJECT DESCRIPTION

1. Introduction

As the lead agency responsible for compliance with the California Environmental Quality Act (CEQA), the Monterey County Water Resources Agency (MCWRA) has determined that the Interlake Tunnel and Spillway Modification Project (project or proposed project) could have the potential to result in a significant impact on the physical environment, and is preparing an Environmental Impact Report (EIR) to evaluate the environmental effects of the project while providing ample opportunity for public disclosure and participation in the planning and decision making process. The proposed project consists of a tunnel which would be capable of diverting water from Nacimiento Reservoir to San Antonio Reservoir, and an increase in the elevation of the spillway at San Antonio Reservoir to increase its storage capacity. Further details of the proposed project are provided below.

The purpose of the draft EIR process is to identify and evaluate possible environmental impacts of the project, and consider mitigation measures and feasible alternatives to avoid, reduce, or compensate for any significant impacts on environmental resources, while still achieving the primary project objectives.

This document, which serves as the Notice of Preparation (NOP) required by CEQA and the State CEQA Guidelines (California Code of Regulations (CCR) title 14, section 15000 et seq.) contains a brief description of the project, including its goals and objectives, and possible environmental impacts (as described in the attached Initial Study). It also provides an overview of the opportunities for participation in review of the EIR, along with contact information.

2. Background

MCWRA is responsible for managing, protecting, and enhancing water supply and water quality, as well as providing flood protection, in the County of Monterey. MCWRA was formed under Chapter 699 of the Statutes of 1947 as the Monterey County Flood Control and Water Conservation District (District). In 1990, the District was renamed the MCWRA and its mandate was updated to provide for the control of flood and storm waters, conservation of such waters through storage and percolation, control of groundwater extraction, protection of water quality, reclamation of water, exchange of water, and the construction and operation of hydroelectric power facilities.

Construction of Nacimiento Dam was completed in 1957 and San Antonio Dam in 1967. Both dams, and the associated reservoirs, were constructed and are owned by MCWRA and serve as flood control, water conservation, and recreation facilities.

Nacimiento Reservoir fills approximately three times faster than San Antonio Reservoir, resulting in the possibility of unused storage in San Antonio Reservoir when Nacimiento Reservoir is at capacity and releasing flood spills. A tunnel connection would provide the conveyance means to transfer water from Nacimiento Reservoir to San Antonio Reservoir

before it is spilled in a flood release. Additionally, water could be transferred from Nacimiento Reservoir at appropriate times to maximize the net storage of the combined reservoirs.

The project has been under consideration since the late 1970s and was included in the MCWRA July 1991 Water Facilities Capital Plan as an approach to better manage flood and conservation flows in the Salinas River watershed. More recently, the project was included in the 2013 Greater Monterey County Integrated Regional Water Management Plan. In May 2014, a group of Salinas Valley growers revitalized the urgency for the project due to the ongoing multi-year drought.

The proposed modification of the San Antonio spillway has been envisioned as a method to enhance the proposed interlake tunnel, but would not be constructed without the interlake tunnel, without which the spillway modification is not warranted.

3. Project Purpose and Objectives

The purpose of the proposed project is to develop a multi-benefit project for the Salinas River Basin to improve water supply sustainability, water quality and flood management. The proposed project is intended to meet the following objectives:

- Minimize flood releases from Nacimiento Reservoir and reduce associated downstream flood damages;
- Increase the overall surface water supply available from Nacimiento and San Antonio Reservoirs by maximizing the opportunity for water to be collectively stored in the reservoirs;
- Improve the hydrologic balance of the groundwater basin in the Salinas Valley and reduce seawater intrusion;
- Continue to meet environmental flow requirements
- Minimize impact on existing hydroelectric production
- Preserve recreational opportunities in the reservoirs; and
- Protect agricultural viability and prime agricultural land.

4. Project Location

The proposed project would be constructed within, between and adjacent to Nacimiento and San Antonio Reservoirs. These reservoirs are located in the Salinas River Basin, northwest of Paso Robles, California in Monterey and San Luis Obispo counties as shown in **Figure 1**. Nacimiento Dam and its reservoir are located in northern San Luis Obispo County, approximately 20 miles inland from the coast. The Nacimiento Dam is situated 10 miles upstream from the confluence of the Nacimiento and Salinas Rivers. San Antonio Dam and its reservoir are located in southern Monterey County, several miles north of Nacimiento Reservoir. The San Antonio Dam is situated 5 miles upstream from the confluence of the San Antonio and Salinas Rivers.

Figure 1
Project Location

Interlake Tunnel and Spillway Modification Project

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The project would primarily occur within locations owned by MCWRA, although portions of the tunnel would be located beneath privately owned land.

5. Existing Facilities and Operations

MCWRA operates Nacimiento and San Antonio Reservoirs, conjunctively, for water supply (groundwater recharge) and flood management purposes. The reservoirs are considered the most prominent elements of the region's water infrastructure. The average annual releases (excluding flood control releases) from these reservoirs to the Salinas River is approximately 200,000 acre-feet, based on hydrologic modeling (EPC 2014).

5.1 Nacimiento Dam and Reservoir

The earth-filled dam at Nacimiento Reservoir, completed in 1957, has a crest elevation of 825 feet above mean sea level (msl). The dam has a spillway elevation of approximately 788 feet which can be raised to 800 feet through the use of two inflatable Obermeyer spillway gates (MCWRA 2015). At 800 feet, the maximum storage capacity is 377,900 acre-feet.

5.2 San Antonio Dam and Reservoir

The earth-filled dam at San Antonio Reservoir, completed in 1967, has a crest elevation of 802 feet above msl and a spillway crest elevation of 780 feet. When the reservoir is full, it has a maximum storage capacity of 335,000 acre-feet. The maximum elevation during flood stage is 802 feet, with a temporary capacity of approximately 477,000 acre-feet.

5.3 Salinas Valley Groundwater Basin

The Salinas River and Salinas Valley Groundwater Basin comprise a linked surface water-groundwater hydrologic setting. Salinas River surface water discharge (streamflow) is highly dependent upon groundwater conditions, and groundwater conditions are equally dependent on recharge by precipitation (infiltration) and streamflow contributions (MCWRA 2014). For example, groundwater pumping affects surface flows, and similarly, seepage of groundwater contributes to streamflows.

6. Project Description

The proposed project is comprised of two separate but interrelated components, a water conveyance tunnel from Nacimiento Reservoir to San Antonio Reservoir, and modifications to the existing spillway at San Antonio Reservoir. The key project features are shown in **Figure 2**.

The proposed project includes the following elements:

- interlake tunnel,
- tunnel intake facility at Nacimiento Reservoir,
- tunnel outlet facility at San Antonio Reservoir,
- San Antonio dam spillway capacity increase,
- removal and replacement of infrastructure surrounding San Antonio Reservoir, and

- disposal of spoils.

The main elements of the proposed project are described in Section 6.2, *Project Elements*, below.

6.1 Project Work Areas

Proposed project activities would occur within the work areas shown in Figure 2. Work areas would include the inlet/outlet structures for the tunnel at the Nacimiento and San Antonio Reservoirs, modifications to the San Antonio Dam spillway, sites of removal and replacement of infrastructure around the San Antonio Reservoir rim, staging and stockpile locations, spoils handling and disposal sites, and access roads. MCWRA may conduct geotechnical investigations along the tunnel alignment prior to construction. While there may be some access points along the tunnel to allow for maintenance, the majority of the surface overlying the tunnel alignment between the tunnel openings would not be disturbed for the proposed project. There would be no direct work downstream from the dams, and the project does not include work on the San Antonio, Nacimiento, or Salinas Rivers.

6.2 Project Elements

Interlake Tunnel

The proposed interlake tunnel would be a gravity flow water conveyance tunnel approximately 12,000 feet (2.3 miles) long connecting the Nacimiento and San Antonio Reservoirs. Two conceptual alignments are shown in Figure 2. Conceptual design envisions a reinforced concrete lined tunnel with an inside finished diameter of 10 feet and a slope from Nacimiento to San Antonio of -0.4 percent. The tunnel will be designed to accommodate internal pressures and seismic activity in the region.

San Antonio Dam Spillway Modification

The proposed modification to the spillway at the San Antonio Reservoir would provide a 10-foot increase in the maximum lake elevation, effectively increasing the storage capacity of the reservoir by approximately 59,000 acre-feet.

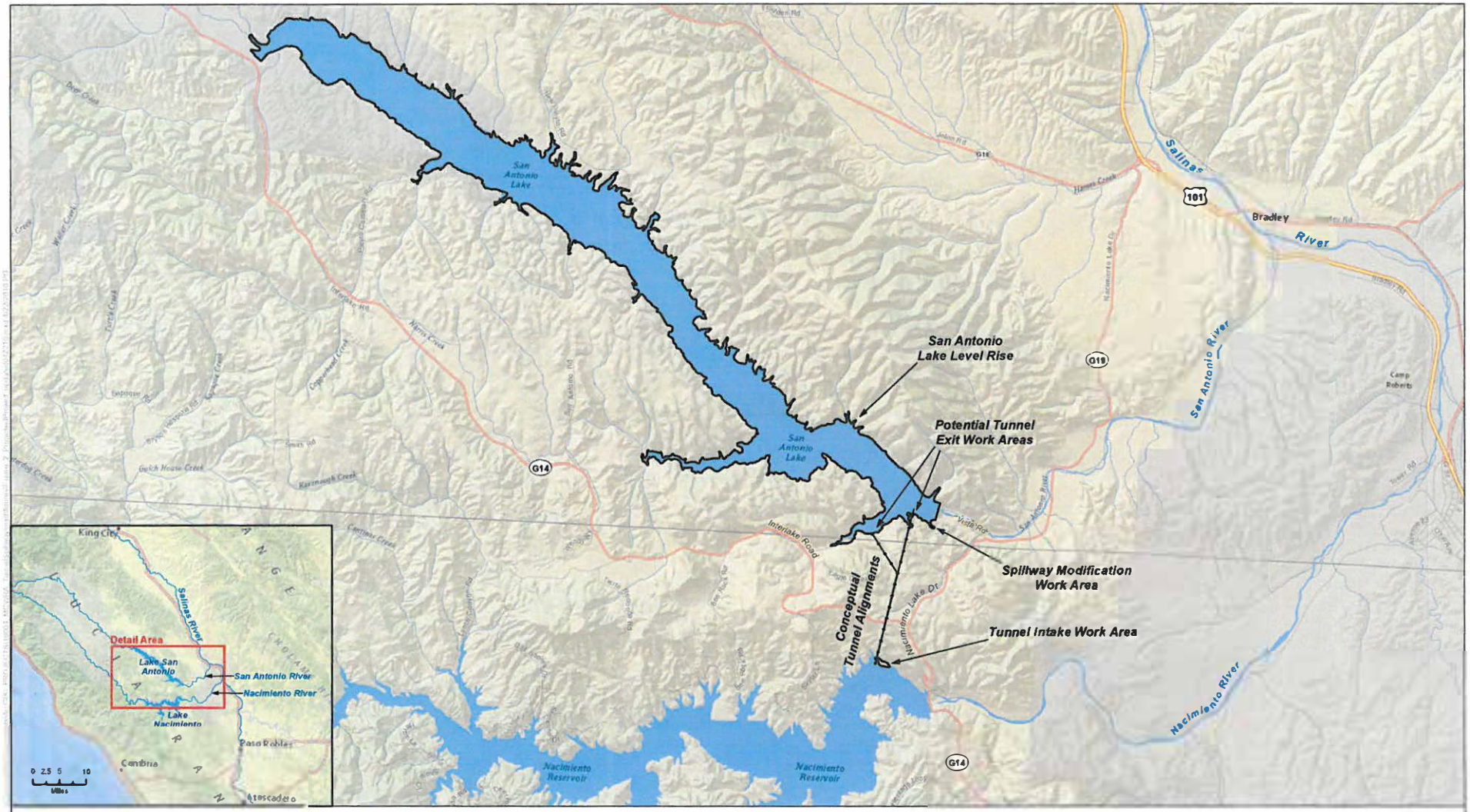

Figure 2
Proposed Project

Interlake Tunnel and Spillway Modification Project

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7. Permits and Approvals

In addition to MCWRA, the EIR for the proposed project will be used by various regulatory agencies issuing permits, as well as other approvals and consultations for the proposed project. Specifically, information about the proposed project and the environmental analysis will be used by several agencies as part of their decision-making process regarding regulations applicable to the proposed project. A list of these agencies is provided below.

- U.S. Army Corps of Engineers
- U.S. Fish and Wildlife Service
- National Marine Fisheries Service
- State Water Resources Control Board
- Central Coast Regional Water Quality Control Board
- California Department of Fish and Wildlife
- Monterey Bay Unified Air Quality Management District
- San Luis Obispo County Air Pollution Control District
- County of Monterey
- County of San Luis Obispo

8. Topics to be Analyzed in the EIR

MCWRA has prepared this NOP pursuant to CEQA Guidelines section 15082. Attached to the NOP is an Initial Study which provides a preliminary environmental impact analysis for the proposed project. The Initial Study evaluates the proposed project as it is currently envisioned.

Based on the proposed project's potential for significant impacts on the environment, MCWRA has decided to prepare an EIR. The EIR will further assess the proposed project's effects on the environment, to identify significant impacts, and to identify feasible mitigation measures to reduce or eliminate potentially significant environmental impacts. Only those topics identified in the Initial Study as having potentially significant adverse effects will be further evaluated in the EIR. The word "significant" is only used in the Initial Study related to the significance of an environmental impact. The Initial Study reviewed the following topics:

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

- Hydrology / Water Quality

Responses received to this NOP may modify or add to the preliminary assessment of potential issues addressed in the EIR.

The draft EIR will also identify a range of reasonable alternatives to the project which could feasibly attain most of the basic objectives of the project but avoid or substantially lessen any of the significant effects of the Project, and it will evaluate the comparative merits of the alternatives, including the No Project alternative.

9. Environmental Process and Public Scoping Meeting

This NOP initiates the CEQA process through which MCWRA will refine the range of issues and project alternatives to be addressed in the draft EIR. Comment is invited on the proposal to prepare the EIR and on the scope of issues to be included in the EIR.

Please submit any comments within 45 days of receipt of this notice to MCWRA (see Section 10, *Contact Information*, below). In conjunction with the 45-day review period for the NOP, MCWRA will hold two scoping meetings to provide an additional opportunity to learn about the project, ask questions, and provide comments about the scope and content of the information to be addressed in the draft EIR. The scoping meetings will be held on the following dates and locations:

Monday, May 16, 2016 at 3:00 p.m.
Agricultural Center Conference Room
1428 Abbott Street
Salinas, CA 93901

Tuesday, May 17, 2016 at 6:30 p.m.
Bradley Union School District Community Building
65600 Dixie Street
Bradley, CA 93426

After the 45-day review and comment period for the NOP is complete, a draft EIR will be prepared in accordance with CEQA, as amended (Public Resources Code §21000 et seq.), and the State Guidelines for Implementation of CEQA (CCR §15000 et seq.).

Once the draft EIR is completed, it will be made available for a 45-day public review and comment period. Copies of the draft EIR will be sent directly to those agencies commenting on the NOP, and will also be made available to the public at a number of locations, including MCWRA offices, and public libraries in the area. Information about availability of the draft EIR will also be posted on the following website: www.mcwra.co.monterey.ca.us

10. Contact Information

For further information or to submit comments, contact the following:

Robert Johnson, Assistant General Manager
Monterey County Water Resources Agency
893 Blanco Circle, Salinas, CA 93901
(831) 755-4860
tunnelEIR@co.monterey.ca.us

Additional information relevant to the Project and the draft EIR can also be found online at the following website: www.mcwra.co.monterey.ca.us.

B. ENVIRONMENTAL CHECKLIST

1. Overview

Project title:	Interlake Tunnel and Spillway Modification Project
Lead agency name and address:	Monterey County Water Resources Agency 893 Blanco Circle, Salinas, CA 93901
Contact person and phone number:	Robert Johnson, (831) 755-4860
Project location:	The project would be located in the Tierra Redondo Quadrangle. The tunnel inlet work area is located in Township 25S, Section 9, Range 10E. The tunnel outlet work area is located in Township 24S, Section 33, Range 10E. The San Antonio Dam spillway work area is located in Township 24S, Section 34, Range 10E. The tunnel alignment is in Township 24S; Sections 4, 9 and 33; Range 10E.
Land designation:	Land zoning designations for the parcels are open space or rural country. Surrounding land use includes low-density residential, rural country and some small-scale agriculture.

2. Environmental Factors Potentially Affected

The environmental factors checked below would potentially be affected by this project (i.e., the project would involve at least one impact that is a "Potentially Significant"), as indicated by the checklist on the following pages.

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

3. Evaluation of Environmental Impacts

The degree of change from existing conditions caused by the project is compared to the impact evaluation criteria to determine if the change is significant. Where it is determined that one or more significant impacts could result from implementation of the project, mitigation measures would be developed to reduce or eliminate the significant impacts. Existing conditions serve as a baseline for evaluating the impacts of the project.

The following terminology is used in this document to describe the various levels of environmental impacts associated with the project:

- A finding of *no impact* is identified if the analysis concludes that the proposed project would not affect a particular environmental topical area in any way.
- An impact is considered *less than significant* if the analysis concludes that the proposed project would not cause a substantial adverse change in the environment.
- An impact would be considered *potentially significant* if the analysis concludes that the proposed project could cause a substantial adverse effect on the environment. Proposed projects that potentially produce a significant impact(s) warrant the greater level of analysis and consideration provided by an EIR.

4. CEQA Environmental Checklist

I. AESTHETICS: Would the project:	Potentially Significant Impact	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?	X		
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a designated scenic highway?	X		
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	X		
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	X		

Explanations

a, b, c) Substantial adverse changes to scenic vistas, scenic highways, and the existing visual character and quality of the site – *Potentially Significant*

The area around the San Antonio and Nacimiento Reservoirs is almost entirely undeveloped and, as a result, broad vistas of the natural environment are abundant from adjacent roads and recreational areas. Furthermore, Nacimiento Lake Drive also known as County Road G14 at Nacimiento Reservoir, and Interlake Road in Monterey County, winds between and connects San Antonio and Nacimiento Reservoirs. Interlake Road is a County Scenic Highway in both Monterey County and San Luis Obispo County (Caltrans 2016). San Antonio Reservoir is occasionally visible from this scenic route, and Nacimiento Reservoir more so, as the scenic highway crosses over the Nacimiento Dam that creates the Nacimiento Reservoir. In addition, distant views of the San Antonio Dam spillway are available from the terminus of Vista Road.

Based on preliminary review of Google Earth, and as shown in **Figure 3**, there are potential residences near the proposed tunnel alignment, near Nacimiento Lake Drive, and County Road G14. There are no residences within approximately 0.25 mile of the tunnel intake work area or the tunnel exit area. As shown in Figure 3, there is a potential recreation area (e.g., a boat ramp) at the tunnel intake area and other potential recreation areas approximately 0.5 mile south of this work area.

The tunnel intake work area and proposed intake facility at the north end of Nacimiento Reservoir may be visible from potential recreation areas to the south of the work area. In addition, depending on topography and the presence of intervening vegetation, distant views from potential residences near the tunnel intake and exit work areas may have distant views of these areas.

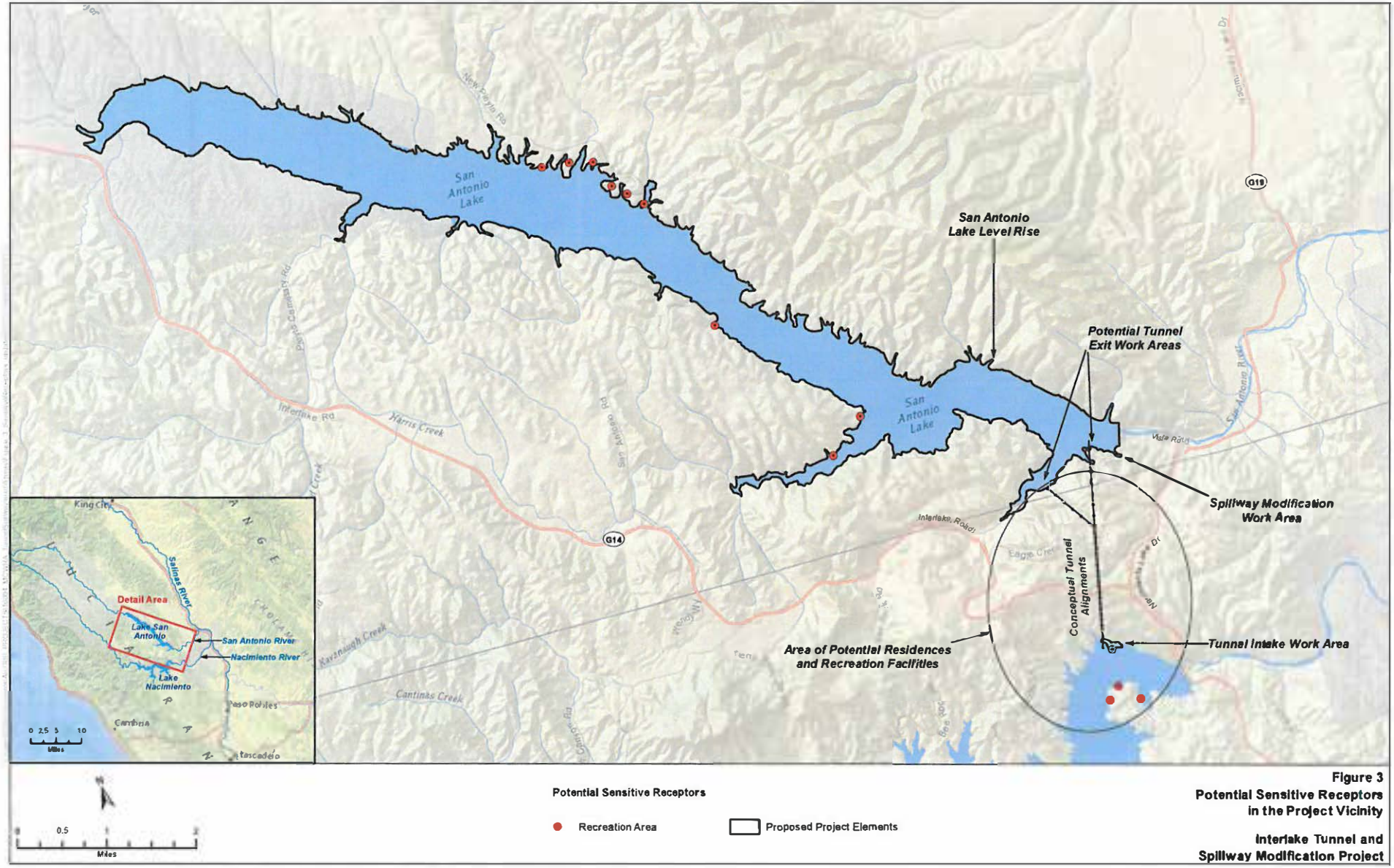

Figure 3
Potential Sensitive Receptors in the Project Vicinity

Interlake Tunnel and Spillway Modification Project

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While San Antonio Reservoir is currently closed to the public at the time of preparing this Initial Study, views of the work areas, the spillway modification, and other improvements to the San Antonio Reservoir may be visible from this reservoir and surrounding recreational facilities.

Although the locations of staging and spoil disposal areas have not yet been determined, during construction, the presence of heavy construction equipment, staging areas, and spoil disposal areas may be partially visible from potential residences and recreational areas, and from Nacimiento Lake Drive/Interlake Road. The types of construction activities that could be visible include vegetation removal and grading activities, excavation, tunnel construction, and dust generated from these activities.

Once construction is complete, the new above-ground facilities (depending on height), such as the Nacimiento intake facility, San Antonio tunnel outlet facility, and modified San Antonio Dam spillway may be visible from scenic corridors, public viewpoints, Nacimiento Reservoir, San Antonio Reservoir, and surrounding camping/day use facilities at both reservoirs. Although the proposed above-ground facilities would likely have a similar character to other dam infrastructure, because the locations and designs of these facilities have not been developed, impacts on aesthetic resources are considered potentially significant. As most potential residences are located over 0.25 mile away from proposed aboveground facilities, no substantial adverse effects to residential views are anticipated.

In addition, the increased normal submergence level within San Antonio Reservoir would alter the visual character of the reservoir. For example, the flooding out of trees located along the existing reservoir's perimeter may cause some trees to die, depending on the timing and extent of inundation for different species, which would temporarily alter the visual character of San Antonio Reservoir.

The EIR will further evaluate these topics. The analysis will also consider critical viewpoints that could be affected by the proposed project. Critical viewpoints will be identified during a comprehensive site survey based on visibility of the project elements, and presence of aesthetic resources and sensitive viewer groups, among other factors. Visual simulations of the proposed facilities and the increased normal submergence level would be developed to help determine the extent of visual impacts, if necessary.

d) Substantial adverse changes to light and glare – *Potentially Significant*

The proposed project would not include any new permanent sources of nighttime lighting. However, the proposed above-ground components have the potential to increase glare in the project area through the introduction of hardscape surfaces. In addition, project construction would introduce temporary sources of light and glare, such as from high-intensity lighting during any nighttime construction activities. These impacts are considered potentially significant. The EIR will further evaluate this topic and will consider the location of sensitive viewer groups in the project vicinity.

II. AGRICULTURAL AND FORESTRY RESOURCES: In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:	Potentially Significant Impact	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?		X	
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?		X	
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Protection (as defined by Government Code section 51104(g)?		X	
d) Result in the loss of forest land or conversion of forest land to non-forest use?		X	
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?		X	

Explanations

a-e) Conflicts or Loss of Agricultural Lands or Forestry Resources – *Less than Significant*

According to the California Department of Conservation's Farmland Mapping and Monitoring Program, the majority of land surrounding San Antonio Reservoir is designated as Grazing Land (CDC 2015a) and some lands are designated as Other Land and Urban and Built-up Land. Lands surrounding Nacimiento Reservoir are designated as Grazing Land, Urban and Built-up Land, and Farmland of Local Potential (CDC 2015b). None of the land immediately surrounding San Antonio Reservoir is under a Williamson Act contract. Some of the lands between the two reservoirs is Non-Prime Agricultural land that is under a Williamson Act contract; however, the proposed tunnel alignment would not traverse lands subject to a

Williamson Act contract (CDC 2012a and 2012b). In addition, there is no forest land within the project area.

Construction of the proposed project would be confined to the San Antonio and Nacimiento Reservoir basins and lands immediately adjacent to the San Antonio Reservoir footprint. The maximum surface water elevation at San Antonio Reservoir would increase by approximately 10 feet, which would inundate lands identified as resource rural residential (5 plus acres per unit) in the Monterey County General Plan (County of Monterey 2010, see Figure LU9) as well as grazing land. No Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, or lands under a Williamson Act contract would be converted by, or conflict with, the proposed project. For these reasons, there is no potential for construction-related impacts to agricultural resources or forestry resources.

Once construction is complete, operation of the two reservoirs would result in changes to downstream flows, which would affect the quantity and timing that water is received by agricultural users. Operation of the proposed project is expected to have a beneficial effect to agricultural resources and will be evaluated further in the EIR.

III. AIR QUALITY: Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:	Potentially Significant Impact	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of applicable air quality plans?	X		
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	X		
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	X		
d) Expose sensitive receptors to substantial pollutant concentrations?	X		
e) Create objectionable odors affecting a substantial number of people?		X	

Explanations

a-b) Conflict with air quality plans and violate any air quality standard or contribute substantially to an existing or projected air quality violation – *Potentially Significant*

The proposed project would be located in Monterey and San Luis Obispo Counties, which are within the North Central Coast and South Central Coast air basins, respectively, and within the jurisdictions of the Monterey Bay Unified Air Pollution Control District (MBUAPCD) and the San Luis Obispo County Air Pollution Control District (SLOCAPCD). Both the North Central Coast and South Central Coast air basins are in nonattainment for the California Ambient Air Quality Standards for ozone and particulate matter (PM_{10}) (CARB 2015). Apart from an area within San Luis Obispo County that is outside of the project area and is in nonattainment for the federal ozone standard, these air basins are designated as unclassified or in attainment for all other federal and state air quality standards (USEPA 2015 and 2016; CARB 2015). To achieve attainment for these standards, the MBUAPCD has prepared the following air quality plans: a 2005 Particulate Matter Plan, a 2007 Federal Maintenance Plan for ozone, a 2008 Air Quality Management Plan (for ozone), and a 2012 Triennial Plan to document the MBUAPCD's progress toward attaining the state ozone standard (MBUAPCD 2005, 2007, 2008, and 2013). The SLOCAPCD prepared a 2001 Clean Air Plan to address ozone precursor emissions and achieve the state's ozone standard (SLOCAPCD 2001).

The proposed project would generate short-term emissions of criteria pollutants, including ozone precursors and particulate matter, during construction activities from equipment use, mobile emissions (vehicle and truck trips), and grading or other sediment-disturbing activities. During operation of the proposed project, there may be increased emissions from

potentially increased worker maintenance trips and/or the use of stationary sources that are associated with the various required mechanical and electrical equipment (such as pumps or generators). These emissions would have the potential to conflict with the applicable air quality plans and/or violate or contribute to an air quality standard exceedance. Therefore, this impact would be potentially significant. The EIR will further evaluate short-term and long-term impacts related to these topics, based on project-specific design, operation, and construction details. Potential pollutant emissions generated by the proposed project will be calculated for all components and phases of the project, and compared to the significance thresholds established by the MBUAPCD and SLOCAPCD with consideration of each district's CEQA guidance documents. The proposed project's consistency with the air quality management plans will also be further evaluated.

c) Cumulatively considerable net increase of any criteria pollutant for which the project region is a nonattainment area – *Potentially Significant*

As discussed above, the proposed project would be located in air basins with existing ozone and PM_{10} state nonattainment designations. Thus, the proposed project's generation of construction- and/or operation-related emissions have potential to contribute a cumulatively considerable net increase of a criteria pollutant. The EIR will further evaluate this topic, based on project-specific design, operation, and construction details, and using the cumulative impact thresholds and guidance provided by the MBUAPCD and SLOCAPCD.

d) Expose sensitive receptors to substantial pollutant concentrations – *Potentially Significant*

The project site is generally located in a remote area of Monterey and San Luis Obispo Counties; but as shown in Figure 3, there are some potential sensitive receptors (i.e., residences) located near and along the tunnel alignment and other work areas. However, hauling trips for the project's construction could occur near sensitive receptors and potentially expose sensitive receptors to diesel exhaust. In addition, the proposed project's construction activities, particularly tunneling activities, could result in the potential exposure of construction workers to diesel exhaust. Recreationists at Nacimiento Reservoir could potentially be exposed to criteria pollutants during construction activities. The proposed project may overlie or disturb soils which contain naturally occurring asbestos and therefore the project could substantially expose sensitive receptors to asbestos (SLOCAPCD 2016; CDC 2000). In addition, the construction-related diesel emissions could result in a potentially significant impact on construction workers or other sensitive receptors. The EIR will further evaluate this topic based on project-specific design, operation, and construction details, and if necessary, by conducting a health risk assessment for exposure to diesel fumes and/or naturally occurring asbestos.

e) Create objectionable odors affecting a substantial number of people – *Less than Significant.*

Construction equipment and trucks for the proposed project could potentially generate odor-causing emissions. However, due to the remote location of the proposed project and the temporary nature of construction-related odors, the proposed project is unlikely to create objectionable odors that affect a substantial number of people. During operation, the reservoir operations would unlikely affect water quality in a manner that results in objectionable odors. Apart from recreationists at San Antonio Reservoir, there are no nearby sensitive receptors. Therefore, this impact would be less than significant.

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

Explanations

a) Substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species - *Potentially Significant*

Terrestrial Special-Status Species. Special-status terrestrial species that have potential to occur in the project area include, but are not limited to, bald eagle *(Haliaeetus leucocephalus)*, California red-legged frog (*Rana draytonii*), least Bell's vireo (*Vireo belli pusillus)*, arroyo toad (*Bufo californicus)*, western pond turtle (*Actinemys marmorata*), yellow-breasted chat (*Icteria virens*), and yellow warbler (*Setophaga petechia)* (MCWRA and USACE 2001). There may also be special-status plants in the project vicinity including: Lemmon's jewelflower (*Caulanthus lemmonii*), pale-yellow layia (*Layia heterotricha*), dwarf calycadenia (*Calycadenia villosa*), and yellow-flowered eriastrum (*Eriastrum luteum*).

The majority of tunnel-related construction activities would occur underground with surface activity occurring at the tunnel portals, which are within the submerged lake boundary zone. Other work areas include access roads, staging areas, the San Antonio outlet valve power actuator facility and the expansion of the San Antonio spillway. Construction activities in these work areas could potentially affect habitat suitable for the special-status animal and plant species mentioned above. The EIR will evaluate these potential impacts further. The evaluation would involve conducting database searches from the California Natural Diversity Database, preparing maps of habitat types in the project area, and field reconnaissance.

During project operation, in the event that there are any special-status plants along the perimeter of San Antonio Reservoir, increased surface water levels could potentially flood these plant communities. This issue will be further evaluated in the EIR.

Aquatic Special-Status Species. The San Antonio River, Nacimiento River, and Salinas River, downstream of the project area, are all designated critical habitat for federally threatened South-Central California Coast steelhead (*Oncorhynchus mykiss*). Nacimiento River may have spawning habitat for steelhead. Drawdown of both the San Antonio and Nacimiento Reservoirs for construction, to the extent needed could, result in construction-related effects on the San Antonio and Nacimiento Rivers downstream of the two reservoirs. Specifically, turbidity levels in discharges are expected to gradually increase as the reservoir is lowered. In addition, operational releases from both the San Antonio Dam and Nacimiento Dam would have effects on steelhead habitat. Such effects would be evaluated further in the EIR.

No aquatic special-status species are known to exist in the reservoirs themselves.

b) Substantial adverse effect on any riparian habitat or other sensitive natural community - *Potentially Significant*

Based on review of the Salinas Valley Water Project EIS/EIR, habitats surrounding the two reservoirs include Blue Oak Woodland (*Quercus douglasii)* (a California Department of Fish and Wildlife-designated sensitive natural community), annual grassland, and chaparral. Open spaces on the hillsides are dominated by annual grassland used for livestock grazing. Blue Oak Woodland habitat is dominated by open stands of mature blue oaks and California foothill pines (*Pinus sabiniana)* around the reservoirs. Dense patches of chaparral occur on some of the steeper slopes in the project area. It is also possible that serpentine geology exists, which often supports sensitive natural communities and special-status plant species. Construction of the proposed intake/outlet tunnel facilities could potentially affect these habitats. During project operation, the increased surface water level at San Antonio Reservoir may temporarily inundate sensitive communities. This is a potentially significant impact and will be further evaluated in the EIR.

Downstream of the project area, riparian habitat occurs along the banks of the Nacimiento and San Antonio Rivers. During project operation, the increased summer releases from San Antonio Reservoir could foster growth of invasive vegetation, such as giant reed (*Arundo* sp.), or generally increase the growth rate of instream vegetation and change the riparian habitat composition. Project-related impacts on riparian habitat are considered potentially significant, and the operational effects on riparian habitat downstream of the project area will be further evaluated in the EIR.

c) Substantial adverse effects on federally protected wetlands – *Potentially Significant*

Both reservoirs are considered jurisdictional waters and any fringe wetlands that exist below the rim of the reservoirs are considered federally protected wetlands. Construction of

proposed facilities at both reservoirs (e.g., the tunnel intake facility at Nacimiento Reservoir and tunnel outlet facility at San Antonio Reservoir) could potentially affect jurisdictional wetlands or waters of the U.S. or state. As such, construction-related effects on protected wetlands and waters of the U.S. and state are considered potentially significant and would be evaluated in the EIR.

In addition, during project operation, raising of surface water levels at San Antonio Reservoir would flood portions of the fringe wetlands. It is anticipated that this impact would be offset as these habitats would eventually re-establish along the new rim of San Antonio Reservoir. Nonetheless, for the purpose of this Initial Study, this impact and is considered a potentially significant impact and would be evaluated in further detail in the EIR.

d) Substantial interference with wildlife movement, established wildlife corridors, or the use of native wildlife nursery sites – *Potentially Significant*

Once the proposed project is operational, transferring of water from Nacimiento Reservoir to San Antonio Reservoir could also result in transfer of aquatic species such as white bass (*Morone chrysops)*, a non-native fish species that was introduced to the reservoir in 1965 by California Department of Fish and Game (now California Department of Fish and Wildlife). The proposed intake may be designed and/or equipped with components to preclude white bass from entering the tunnel and transferring these species from Nacimiento Reservoir to San Antonio Reservoir. This is considered a potentially significant impact and will be evaluated further in the EIR.

Altered reservoir operations as a result of the proposed project could affect native fish, specifically nests which could be dewatered as a result of changing reservoir levels. This is considered a potential significant impact and will be evaluated further in the EIR.

In addition, changes in future releases from the reservoirs could affect steelhead passage conditions. It is anticipated that increased releases during the dry season would be beneficial due to a larger wetted area of the channel during the dry season compared to baseline conditions. However, this topic will be evaluated further in the EIR and will consider flow velocity, temperature, other water quality parameters, spawning, holding and rearing habitat and rearing habitat and refugia, sediment transport/geomorphology, predation, lagoon opening/closure regimes, and other issues/parameters.

e) Conflict with local policies or ordinances protecting biological resources – *Potentially Significant*

The proposed project could result in conflicts with local Monterey County or San Luis Obispo County policies or ordinances protecting biological resources. As a thorough review of relevant biological resources policies and ordinances has not yet been conducted for this Initial Study, this issue will be evaluated further in the EIR.

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state HCP - *No Impact*

There are no habitat conservation or natural community conservation plans that cover the project area. Therefore, the project would not conflict with provisions of such plans and there would be no impact.

V. CULTURAL RESOURCES: Would the project:	Potentially Significant Impact	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	X		
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	X		
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	X		
d) Cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code 21074?	X		
e) Disturb any human remains, including those interred outside of formal cemeteries?	X		

Explanations

a-b) Adverse change in the significance of a historical resource or an archaeological resource - *Potentially Significant*

Historical resources are defined under CCR 15064.5 as cultural resources listed in or determined to be eligible for the California Register of Historical Resources (CRHR); resources included in a local register of historical resources; or any object, building, structure, site, area, place, record, or manuscript determined to be historically significant by a lead agency. The locations of any historical resources in the project area are currently unknown, although the San Luis Obispo County General Plan (County of San Luis Obispo 2010, see Figure CR-1) indicates that many known cultural resources are present around Nacimiento Reservoir, and the Monterey County General Plan (County of Monterey 2008) identifies the entire area around San Antonio Reservoir as sensitive for cultural resources. Potential impacts to historical resources would occur if these resources are present and would be physically disturbed by proposed project activities, either as a result of project construction (e.g., from ground disturbance) or operations (e.g., shoreline erosion of archeological deposits and/or damage to historic structures as a result of increased levels in San Antonio Reservoir). Impacts on archaeological or architectural resources which cause de-listing from the CRHR, or render the resources ineligible for listing in the CRHR, would also be considered significant.

The EIR will further evaluate these topics based on project-specific design and construction details.

c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature – *Potentially Significant*

The project area is underlain by geological formations that are largely derived from marine sediments. As a result, most of the paleontological resources in the region are of marine lifeforms, such as micro-organisms (e.g. foraminifera or diatoms), or mollusks and barnacles. Although paleontological resources are not uncommon in the region, no significant paleontological finds have been recorded in close proximity to the project (County of Monterey 2008). It is possible that tunnel construction could encounter paleontological resource through boring activities, but the nature of the work would not be conducive to identifying any such resources, as they would be obliterated. As a result, there could be potentially significant impacts related to paleontological resources. This topic will be further evaluated in the EIR.

d) Adverse change in the significance of a tribal cultural resource as defined in Public Resources Code 21074 - *Potentially Significant*

The project is within a geographic area associated with the Salinan, Costanoan/Ohlone, and Esselen California Native American tribes who have a traditional and cultural affiliation with the region. Assembly Bill 52, which was enacted on July 1, 2015, requires that a state lead agency consult with California Native American tribes with a traditional and cultural affiliation to a project area in order to determine if any tribal cultural resources (TCRs) would be affected by the proposed project. PRC 21074 defines TCRs as resources that are historical resources under CCR 15064.5; cultural landscapes that meet the criteria of CCR 15064.5; and as unique archaeological sites pursuant to PRC 21083.2. There is the potential for TCRs to be located in the project area and for the project to have an adverse change to any such resources.

MCWRA will consult with local tribes about the presence of TCRs, if any, within the project area and, should any be identified, the protection of TCRs from project-related actions. The consultation efforts and the identification of TCRs, if present, will be analyzed in the EIR.

e) Disturbance of any human remains, including those interred outside of formal cemeteries - *Potentially Significant*

Human remains are not currently known to exist within the project area; however, they may be present without any surface manifestation and, as a result, could be disturbed by project activities. The EIR will address the potential presence of human remains and the possibility of impacting human remains during project construction.

VI. GEOLOGY AND SOILS: Would the project:	Potentially Significant Impact	Less Than Significant Impact	No Impact
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death related to:			
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.		X	
ii. Strong seismic ground shaking?		X	
iii. Seismic-related ground failure, including liquefaction?		X	
iv. Landslides?	X		
b) Result in substantial soil erosion or the loss of topsoil?	X		
c) 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?	X		
d) 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?		X	
e) 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 wastewater?			X

Explanations

a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i. Seismic-related rupture of a known earthquake fault - *Less than Significant*

The nearest Alquist-Priolo Fault zones are the Los Osos Fault system, approximately 19 miles west, and the San Andreas Fault system, approximately 22 miles east (CGS 2015; USGS 2016). The Rinconada Fault zone – San Marcos section, runs in a northwestern direction along the northeastern boundary of San Antonio Reservoir. This fault is considered "potentially active" with the last known rupture occurring during the late Quaternary Period

(last 700,000 years). The Rinconada fault is not designated as an Alquist-Priolo fault zone (USGS 2016). The project would be built to accommodate seismic activity in the region. Regardless, the EIR will further evaluate the extent to which the project could expose people or structures to substantial adverse effects resulting from the rupture of a known earthquake fault.

ii. Strong seismic ground shaking - *Less than Significant*

The proposed project would be designed and constructed in accordance with the California Building Code and California Department of Water Resources Division of Safety of Dams (DSOD) standards and requirements. DSOD would be responsible for reviewing and approving plans and specifications for the proposed modifications to the San Antonio spillway, the tunnel intake facility at Nacimiento Reservoir, and tunnel outlet facility at San Antonio Reservoir to ensure dam safety. The DSOD takes seismically induced stresses into consideration for dam construction and modifications. While the proposed project would be designed and constructed to DSOD requirements which will ensure that the facilities can withstand strong seismic ground shaking in the event of a large magnitude earthquake, the EIR will further evaluate the extent to which the project could expose people or structures to substantial adverse effects related to strong seismic ground shaking.

iii. Seismic-related ground failure, including liquefaction – *Less than Significant*

Liquefaction is the temporary transformation of saturated and very low cohesion or cohesionless soils into a viscous liquid as a result of ground shaking. Liquefaction may occur in water-saturated sediment during moderate to great earthquakes. Upon preliminary review of the Natural Resources Conservation Service Web Soil Survey, the most common soils associations in the project area include Santa Lucia Reliz (SLR), Linne-Calodo complex, and Balcom-Calleguas complex (NRCS 2016). The soil units within the project area are composed primarily of channery clay loam or clay loams. Underlying geologic units in the area are predominately late Pilocene or Milocene marine deposits (CGS 1958). These soil and geological units would not be anticipated to become unstable or to liquefy during a seismic event. Regardless, the EIR will further evaluate the extent to which the project could expose people or structures to substantial adverse effects related to seismic-related ground failure.

iv. Landslides - *Potentially Significant*

The geographic area between San Antonio Reservoir and Nacimiento Reservoir is fairly hilly with several very steep slopes. Based on topographical mapping (USGS 2015), some areas may be prone to landslides under wet conditions and/or seismic induced events. However, MCWRA will locate the tunnel intake portals away from known landslide zones. During construction activities, there is some potential for open excavation areas to fail. With proper safety procedures, required inspections, the risk of collapse caused by a landslide are expected to be minimal. Landslide effects will be evaluated further in the EIR.

b) Substantial soil erosion or the loss of topsoil - *Potentially Significant*

Current plans do not anticipate the need for lowering reservoir levels at the beginning of construction. However, weather conditions and the project schedule may necessitate the lowering of reservoir levels whereby water would be released from both reservoirs at flow rates greater than typical conditions. Increased flow rates in the San Antonio and Nacimiento Rivers have the potential to scour or erode downstream habitat; however, the ramping rates for flow changes are not expected to be large enough to cause substantial scour along the stream channels. Regardless, this topic will be evaluated further in the EIR.

Project construction activities would have the potential to contribute to accelerated erosion. During construction, clearing, grubbing and grading activities would remove ground cover and expose and disturb soil on slopes and at the proposed tunnel excavation portals. Exposed and disturbed soil would be vulnerable to erosion from runoff during construction, and soil particles could get entrained in the runoff. Altered drainage patterns due to construction work could also redirect runoff and potentially worsen any erosion problems. A construction general permit would need to be obtained from the Central Coast Regional Water Quality Control Board, which will require preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP). MCWRA and/or its contractor(s) would be required to comply with various erosion protection measures outlined in the SWPPP. This will be evaluated further in the EIR.

In addition, construction earthwork may involve removing a substantial volume of topsoil in preparation of the tunnel portal sites. This work may occur in previously undisturbed areas. In addition, tunnel spoils, depending upon how they are disposed of, may be susceptible to erosion. These impacts are considered potentially significant and will be further evaluated in the EIR.

Once project construction is complete, raising the level of San Antonio Reservoir 10 feet could potentially cause erosion by wave action and water fluctuation in areas that previously were not inundated. These impacts are considered potentially significant and will be evaluated further in the EIR.

c) Location on a geologic unit or soil that is unstable or that would become unstable as a result of the Proposed Project and potentially result in an on-site or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse - *Potentially Significant*

See the discussion for criteria a., iii and iv, above. As described above, the proposed tunnel would traverse under a steep and hilly terrain. Construction-related ground-disturbing or excavation activities at the tunnel portals could alter the soil stability in those immediate locations. Excavation and trenching for the tunnel portals and other proposed structures, as well as reservoir dewatering, may create unstable slopes. These impacts are considered potentially significant and will be evaluated further in the EIR.

d) Location on expansive soil – *Less than Significant*

Soils that contain a relatively high percentage of clay minerals have the potential to shrink and swell with changing moisture conditions. The most common soils associations in the project area include SLR, Linne-Calodo complex, and Balcom-Calleguas complex (NRCS 2016) and are composed primarily of channery clay loam or clay loams. These soil units have a low to moderately low plasticity index rating and are not considered expansive soils. This impact would be less than significant.

e) Create substantial risks to life or property or have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems – *No Impact*

The project would not involve construction of septic tanks or alternative wastewater disposal systems. Therefore, no impact would occur.

VII. GREENHOUSE GAS EMISSIONS: Would the project:	Potentially Significant Impact	Less Than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	X		
b) Conflict with any applicable plan, policy or regulation of an agency adopted for the purposed of reducing the emissions of greenhouse gases?	X		
c) Encourage activities that result in the use of substantial amounts of fuel or energy, or use these resources in a wasteful manner?	X		

Explanations

a) Generate a net increase in greenhouse gas emissions which may have a significant impact on the environment - *Potentially Significant*

The proposed project would generate short-term direct emissions of greenhouse gases (GHGs) during construction activities through the combustion of fossil fuels by construction equipment, worker vehicles and construction-related trucks. During operation, the proposed project could directly emit GHGs through a variety of stationary (i.e., fossil-fueled mechanical equipment) and mobile (worker or equipment vehicles) sources. Furthermore, potential energy use by electrical equipment for the proposed project could indirectly emit GHGs if the electricity used was generated by the consumption of fossil fuels. Therefore, the proposed project would generate a net increase in GHG emissions that would potentially have a significant impact.

The EIR will further evaluate this topic, based on project-specific design, operation, and construction details, quantify GHGs emitted during project construction and operation, and make an impact determination based upon the available GHG impact thresholds and/or guidance provided by the MBUAPCD and SLOCAPCD. For the proposed project's operation-related GHG estimates, the analysis will focus on the net change in GHG emissions through a comparison to the current GHG emissions associated with operation of the facilities, including worker commuting, operations and maintenance equipment.

b) Conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases – *Potentially Significant*

As described above, the proposed project's construction and operation would directly and possibly indirectly result in GHG emissions. If these GHG emissions exceed established thresholds or if other aspects of the proposed project (including its design or operation) conflicted with goals and objectives identified in the adopted plans, policies, or regulations, this would result in a potentially significant impact. Plans potentially applicable to the proposed project include the SLOCAPCD's *Greenhouse Gas Thresholds and Supporting*

Evidence document (SLOCAPCD 2012), San Luis Obispo County's *EnergyWise Plan* (i.e., climate action plan) (County of San Luis Obispo 2011), the *Integrated Climate Change Adaptation Planning in San Luis Obispo County* document (The GEOS Institute 2010), and the MBUAPCD's draft *Guidelines for Implementing the California Environmental Quality Act* (2016). An assessment of the proposed project's consistency with all policies contained in the above-mentioned documents has not yet been performed, therefore this impact is considered potentially significant. The EIR will further evaluate this topic based on project-specific design, construction, and operation details.

c) Encourage activities that result in the use of substantial amounts of fuel or energy, or use these resources in a wasteful manner – *Potentially Significant*

Because the specific fuel or energy use requirements for the proposed project's construction and/or operation have not been yet evaluated, the potential for the proposed project to use substantial amounts of fuel or energy, or use these resources in a wasteful manner is considered potentially significant. The EIR will further evaluate this topic based on project-specific design, construction, and operation details. The EIR analysis will consider the proposed project's short-term and long-term fuel and energy use compared to the existing energy use, identify potential energy sources (i.e., renewable), and determine if fuel or energy resources would be used in a wasteful manner or in substantial amounts. The analysis will consider changes, if any, in hydropower generation at Nacimiento Reservoir.

VIII: HAZARDS AND HAZARDOUS MATERIALS: Would the project:	Potentially Significant Impact	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, storage or disposal of hazardous materials?	X		
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	X		
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	X		
d) 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?	X		
e) Be located within an airport land use plan area or, where such a plan has not been adopted, be within 2 miles of a public airport or public use airport and result in a safety hazard for people residing or working in the study area?			X
f) Be located within the vicinity of a private airstrip and result in a safety hazard for people residing or working in the study area?			X
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?		X	
h) Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	X		

Explanations

a, b) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment - *Potentially Significant*

Once construction is complete, operation of the proposed project would be unlikely to result in permanent use of any new hazardous materials that are currently not used at the two reservoirs. However, during project construction, hazardous materials, such as fuel, oil, lubricants, or other hazardous construction materials would be used to power construction

equipment and perform construction activities. Potentially significant impacts could occur if these hazardous materials were released into the environment from improper transport, use, storage, or disposal. As described in Section IX, *Hydrology and Water Quality,* the project would need to prepare a SWPPP as part of its compliance with applicable National Pollutant Discharge Elimination permits. As part of the SWPPP, MCWRA and/or its contractor would be required to implement various best management practices that would minimize the potential for adverse impacts regarding the release of hazardous materials into the environment. The EIR will further evaluate this topic, based on project-specific construction details.

c) Emit hazardous emissions or involve handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school - *Potentially Significant*

The Cappy Culver Elementary School is located approximately 2 miles from the Nacimiento Reservoir construction work area. As described above, construction and operation of the project would include the use, storage, and/or transport of hazardous materials. Because the haul routes for the proposed project have not yet been determined, this school could be within 0.25 of one of the project haul routes. As such, this issue is considered potentially significant and will be evaluated further in the EIR.

d) Located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment - *Potentially Significant*

The project is not on the Cortese List pursuant to Government Code Section 65962.5. Based on a review of State Water Resources Control Board's Geotracker and California Department of Toxic Substances Envirostor databases, there is no existing hazardous material contamination on the project work areas (SWRCB 2016; DTSC 2016). However, the Monterey Formation, through which the tunnel will be constructed is known to contain hydrocarbons (oil). Therefore, there is the potential for discovery of previously unknown contamination during ground excavation activities. If hazardous levels of contaminants are encountered, a significant impact on construction workers, the public, and environment could result. This issue will be further evaluated in the EIR.

e, f) Located within an airport land use plan area or, where such a plan has not been adopted, be within 2 miles of a private airport, a public airport, or a private airstrip, and result in a safety hazard for people residing or working in the study area - *No Impact*

The nearest airport to the project site is the McMillan Airport on the Camp Roberts Military Reservation, at a distance of approximately 7.25 miles. Other landing strips are found on Fort Hunter Liggett Military Reservation about 9 miles away and the San Ardo Field at about 9 and 12 miles away, respectively. Thus, there are no airports, public or private, within 2 miles of the project site and there would be no public safety hazard impacts related to airports.

g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan - *Less than Significant*

The County of Monterey Office of Emergency Services (OES) maintains and implements the Monterey County's Emergency Response Plan (plan). The plan provides an organizational

framework and the duties of the various Monterey County departments to ensure coordination amongst the departments during times of emergency (County of Monterey County 2010, S-2). Monterey County Parks Department may also have an emergency response plan and MCWRA has an Emergency Action Plan to follow during a dam failure event. Similarly, the County of San Luis Obispo, through its OES, provides services to the community and County of San Luis Obispo departments to prepare for effective response to all types of disasters and has an Emergency Operations Plan to coordinate the various County departments (San Luis Obispo County 2016). At this time, there is no official adopted emergency response plan to coordinate the County departments, although specific departments have plans. Any short-term lane closures or detours on nearby roads during construction have the potential to interfere with implementation of these emergency response plans. However, once construction is complete, none of the elements proposed by the project would have an effect on these programs or services. MCWRA would comply with the appropriate emergency response plans during the project's construction phase to ensure that applicable safety measures are in place in the event of an emergency. Therefore, potential impacts on adopted emergency response plans would be less than significant.

Construction-related roadway closures or detours that could affect the provision of emergency services in the vicinity of the work site are discussed in Section XVI, *Transportation and Traffic*.

h) Expose People or Structures to a Significant Risk of Loss, Injury, or Death Involving Wildland Fires, Including Where Wildlands Are Adjacent to Urbanized Areas or Where Residences Are Intermixed with Wildlands - *Potentially Significant*

The primary fire season in the project area extends from late summer through fall when air temperatures are high and conditions are driest. Fire hazards in the rural inland portions of Monterey and San Luis Obispo counties are influenced by topography and wind patterns. The area around San Antonio Reservoir is largely in a high wildland fire zone, with minor portions of the shoreline falling under the moderate category (Monterey County 2010b, Exhibit 4.13.1). Fire protection services are provided by the California Division of Forestry (CDF), with the exception of the northwest end of the reservoir, which is under the protection of the U.S. military (Monterey County 2010b, Exhibit 4.11.1). Lands surrounding Nacimiento Reservoir are considered to be in a very high fire hazard area (County of San Luis Obispo 2016), and are under the protection of CDF. However, the project work areas are not located in a fire hazard area or within the wildland-urban interface. While a slight possibility exists that construction equipment could cause a fire, the risk of exposure of people or structures to fire danger would be very small, and emergency response would be available to respond to any fires.

During the summer time, CAL FIRE sometimes uses water from Nacimiento and San Antonio Reservoirs for firefighting purposes. Thus, during construction, the lowering of reservoir levels and potential dewatering of the reservoirs (if necessary) could affect CAL FIRE's ability to respond to wildland fires and temporarily increase risks to people and structures in the event a wildland fire occurs. This impact is considered potentially significant and will be evaluated further in the EIR.

IX. HYDROLOGY/WATER QUALITY: Would the project:	Potentially Significant Impact	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements?	X		
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local ground water table level (for example, 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)?	X		
c) Substantially alter the existing drainage patterns of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	X		
d) Substantially alter the existing drainage patterns of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	X		
e) Create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	X		
f) Otherwise substantially degrade water quality?	X		
g) 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?			X
h) Place within a 100-year flood-hazard area structures which would impede or redirect flood flows?			X
i) 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?	X		
j) Inundation by seiche, tsunami, or mudflow?		X	

Explanations

a, f) Violate any water quality standards, waste discharge requirements or otherwise substantially degrade water quality - *Potentially Significant*

Several aspects of the proposed project's construction phase have the potential to degrade water quality in a manner that could exceed water quality standards and/or otherwise degrade water quality. Although current plans do not anticipate the need for lowering reservoir levels at the beginning of construction, weather conditions and, the project schedule may necessitate the lowering of reservoir levels. Should water levels at both reservoirs need to be lowered at the beginning of the construction phase, coffer dams would likely be constructed to maintain dry construction areas for the intake structure at Nacimiento Reservoir and outlet facility at San Antonio Reservoir. During reservoir lowering, water from the reservoirs may be discharged downstream to San Antonio Creek and Nacimiento Creek, which are tributaries of the Salinas River.

Water discharged from the two reservoirs would be expected to contain elevated levels of suspended solids, high water temperatures, low dissolved oxygen levels, and potentially elevated mercury levels, especially as the water level in the reservoirs decline. Discharges of poor quality water from both reservoirs could degrade water quality conditions in both creeks, and could also affect water quality conditions of the Salinas River further downstream.

During construction of the tunnel intake (at Nacimiento Reservoir) and tunnel outlet (at San Antonio Reservoir), the excavation areas along the perimeter of the reservoirs would require dewatering of any nuisance inflows. These inflows as well as any runoff from exposed soils in nearby work areas are likely to contain high concentrations of particulates (high suspended solids) and potentially residual petroleum products from construction equipment. If such material is discharged to the reservoirs, these pollutants would potentially exceed water quality standards or otherwise degrade beneficial uses.

MCWRA and/or its contractor(s) would be required to obtain a Construction General Permit from the Central Coast Regional Water Quality Control Board and consistent with that permit will need to prepare and implement a SWPPP. The SWPPP would include stormwater control measures designed to minimize adverse effects to water quality during construction. Potential water quality degradation from construction of the proposed project will be evaluated further in the EIR. The EIR will identify measures that could reduce construction-related water quality impacts to a reduced level of significance.

Once construction is complete, water through the tunnel from Nacimiento Reservoir to San Antonio Reservoir could potentially transfer contaminants in Nacimiento Reservoir to San Antonio Reservoir. In particular, the EIR will evaluate the transfer of mercury (Hg), which is known to be present in both reservoirs, from Nacimiento Reservoir through the Interlake Tunnel to San Antonio Reservoir. Hg is a toxic constituent that bioaccumulates in the food chain of aquatic organisms and terrestrial wildlife, and is ultimately a human health concern primarily through the consumption of contaminated fish. Methylmercury (MeHg) is a bioavailable form of Hg that is produced from inorganic Hg by specific types of aquatic bacteria in rivers and reservoirs. For the proposed project, the concern is how the water transfers could lead to increased levels of MeHg in San Antonio Reservoir or to downstream areas. Total Hg transported to areas where methylation occurs has a direct impact on the levels of MeHg produced. MeHg production has been shown to be a function of Hg concentrations in sediment in many different watersheds, including the Delta (Krabbenhoft et al. 1999 and Heim et al. 2003). This potentially significant impact will be evaluated in the EIR and, as relevant, would consider the State Water Resource Control Board's management measures and approaches.

In addition, during project operation, the increased water level at San Antonio Reservoir could result in turbidity impacts in newly inundated shoreline areas that are susceptible to erosion. This issue will be evaluated further in the EIR.

b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge, resulting in a net deficit in aquifer volume or lowering of the local groundwater table level – *Potentially Significant*

Both Nacimiento Reservoir and San Antonio Reservoir provide a surface supply for groundwater recharge in the valley downstream. During construction, the reservoir water levels would be lowered, thus reducing availability of water during normal release periods for recharge of groundwater basins downstream.

During construction of the tunnel, excavation may encounter groundwater which will be addressed with grouting and a watertight tunnel lining to prevent inflows into the tunnel and to limit any impacts to the groundwater levels. Such work is not anticipated to substantially deplete groundwater supplies, and such work would likely be covered by the project's Construction General Permit.

Operation of the proposed project would increase releases from the reservoirs during the dry season and thereby support groundwater recharge downstream of the project area. This particular impact is anticipated to be beneficial. However, the operational changes regarding conveyance and diversion of water for groundwater basin recharge, required releases pursuant to the Salinas Valley Water Project flow prescription, sea water intrusion, and groundwater levels in the Salinas River Groundwater Basin will be evaluated further in the EIR.

In addition, depending on the depth, the proposed tunnel could potentially affect groundwater (e.g., that found in bedrock fractures) underlying the tunnel alignment. The tunnel could therefore potentially disrupt the fracture aquifer system which supplies water to overlying land uses.

The potentially significant impacts described above will be evaluated further in the EIR.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, resulting in substantial erosion or siltation on-site or off-site, or create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff - *Potentially Significant*

Project construction may involve lowering water levels at both reservoirs and potentially increased discharges to San Antonio and Nacimiento Rivers. In addition, substantial excavation would be needed when constructing the tunnel portals, the intake structure at Nacimiento Reservoir, and the outlet structure at San Antonio Reservoir. These excavation activities could alter the existing local drainage patterns in the project work areas, such that indirect erosion or siltation would occur. Potential erosion from these activities will be addressed in the SWPP presented in Section VI, *Geology and Soils*.

While no project components would be constructed downstream of the San Antonio Dam or Nacimiento Dam, operation of the reservoirs would result in altered releases from the reservoirs which could substantially affect drainage patterns downstream or contribute sources of polluted runoff. In particular, operation of the proposed project is expected to

reduce the number of spill events, which may result in fewer geomorphically effective flows (i.e., channel forming flows), reduced sediment transport during storm events, and the downstream extent of such effects. Operational flow releases may result in some local geomorphic effects along the rivers immediately downstream of the reservoirs, but once on the main stem of Salinas River, such effects may not be significant due to the size of the watershed and scale of uncontrolled flows in the river. Nonetheless, the alteration of downstream river flows associated with the anticipated change in spill events and reservoir releases would be evaluated further in the EIR.

These potentially significant impacts will be evaluated further in the EIR.

d, e) 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 resulting in flooding on-site or off-site; or create runoff that would exceed the existing stormwater systems - *Potentially Significant*

The proposed project would result in modifications to the spillway at San Antonio Reservoir and construction of the inlet/outlet structures for the tunnel at the two reservoirs. These modifications would not substantially increase runoff from the project area itself such that flooding on-site or off-site would occur or that the local stormwater drainage system would need to be upgraded. The spillway modifications at San Antonio Reservoir are intended to allow the reservoir to accommodate increased water storage capacity of the reservoir of approximately 59,000 acre-feet, and would increase the ability for the two reservoirs to capture flood flows which would otherwise spill from the reservoir, a beneficial impact related to flooding. This issue will be further evaluated in the EIR.

g, h) Place housing within a 100-year flood hazard area, place structures within a 100-year flood hazard area resulting in impeding or redirect flood flows– *No Impact*

Portions of the tunnel intake facility at Nacimiento Reservoir, the tunnel outlet facility at San Antonio Reservoir, and the spillway modifications, would be within the 100-year flood hazard area. However, they would be designed to be submerged and withstand flood flows. Furthermore, both the Nacimiento Dam and San Antonio Dam were constructed in part to protect people against large flood events, and one of the objectives of the proposed project is to enhance flood protection for the Salinas Valley through increased flood storage capacity. As such, the project is expected to have a beneficial effect with regard to potential risk of injury or death involving flooding. Regardless, this issue will be further evaluated in the EIR.

The proposed project does not involve placement of housing within a flood hazard area. Therefore, criterion g) is not applicable to the proposed project.

i) 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*

The potential for dam failure as a result of the increased spillway height and storage in San Antonio Reservoir is considered a potentially significant impact that will be evaluated further in the EIR.

j) Contribute to inundation by seiche, tsunami, or mudflow – *Less than Significant*

The project area is located too far inland to be influenced by a tsunami event.

While the probability is low, as project construction would occur at two large inland water bodies (Nacimiento and San Antonio Reservoirs), the project could temporarily expose construction workers to seiche and mudflow hazards. Potential for mudflow is limited in the inland portions of the County but there is a remote possibility that mudflows could inundate areas where significant slopes are located (County of Monterey 2010). However, project components would be constructed consistent with DSOD standards and are not anticipated to increase mudflow or seiche hazards. This impact would be less than significant, but will be further evaluated in the EIR.

X. LAND USE AND PLANNING: Would the project:	Potentially Significant Impact	Less Than Significant Impact	No Impact
a) Physically divide an established community?			X
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	X		
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?			X

Explanations

a) Divide an established community - *No Impact*

The proposed project would be confined to the reservoir areas and, at San Antonio Reservoir, lands immediately adjacent to the existing reservoir footprint. The tunnel would be constructed underground between the two reservoirs. The project area consists of open space lands with few residences. As such, the project would not divide an established community.

b) Conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect – *Potentially Significant*

The project has the potential to result in potential conflicts with land use policies or plans adopted for the purpose of avoiding or mitigating an environmental effect. The proposed project will be reviewed against existing land use policies from both Monterey County and San Luis Obispo County, including General Plans, Area Plans, and any other specific plans associated with the vicinity.

c) Conflict with any applicable habitat conservation plan or natural community conservation plan - *No Impact*

The proposed project is not located in an area covered by a habitat conservation plan or natural community conservation plan. Therefore, no impact would occur.

XI. MINERAL RESOURCES: Would the project:	Potentially Significant Impact	Less Than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?			X
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?			X

Explanation

a, b) Loss of availability of mineral resources - *No Impact*

Based on review of the Monterey County General Plan EIR, there are no known mineral resource zones, mines or quarries within the project work areas around San Antonio Reservoir. According to Exhibit 4.5.1 of the Monterey County General Plan EIR, there are a few oil wells and non-metallic mineral mines in the vicinity of the southeastern end of San Antonio Reservoir (County of Monterey 2010). There are no mines or other known resources in the vicinity of the Nacimiento Reservoir work areas (County of San Luis Obispo 2010). The proposed project elements and activities would not directly affect mineral production sites or prevent future availability of mineral resources. As a result, the project would have no impact on mineral resources.

XII. NOISE: Would the project:	Potentially Significant Impact	Less Than Significant Impact	No Impact
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	X		
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	X		
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?		X	
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above existing levels without the project?	X		
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?			X
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?			X

Explanations

a, b, d) Temporary construction noise and vibration noise levels in excess of standards established in the local general plan or noise ordinance, or in other applicable local, state or federal standards - *Potentially Significant*

Operation of heavy construction equipment in the project work area during the construction phase would temporarily increase noise and groundborne vibration levels. Potential noise and/or vibration needs to be evaluated to determine the extent to which it would be audible at sensitive noise receptors (e.g., residences and campgrounds) near the project work area. In addition, heavy trucks accessing the project work areas through local roads would temporarily increase traffic noise levels, and would also be potentially audible at properties along these roads.

Although the construction generated noise and/or vibrations would be short-term and temporary, increased levels could potentially exceed the construction noise limits established by Monterey and San Luis Obispo Counties. This impact is considered potentially significant. The EIR will further evaluate this topic based on project-specific construction details.

c) Substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project - *Less than Significant*

Operation of the project facilities is not anticipated to result in substantial changes in noise levels. The discharge of water into San Antonio reservoir from the tunnel when the outlet is

not submerged would generate noise as the hydraulic energy is dissipated from the San Antonio energy dissipation structure. In addition, because water passing through the modified San Antonio Dam could occur at a more frequent rate than has occurred in the past, noise generated from water passing through the dam could be greater than existing conditions. However, such changes would not be substantial and there are no sensitive receptors in the vicinity of these locations. This impact would be less than significant.

e, f) For a project located within an airport land use plan area, or, within 2 miles of a public airport, a public-use airport, or in the vicinity of a private airstrip would the project expose people residing or working in the project site to excessive noise levels - *No Impact*

As discussed in Section VIII, *Hazards and Hazardous Materials,* the nearest airport to the project site is the McMillan Airport on the Camp Roberts Military Reservation, approximately 7.25 miles away. Other nearby landing strips are found on Fort Hunter Liggett Military Reservation about 9 miles away and the San Ardo Field at about 9 and 12 miles away, respectively. Thus, there are no public or private airports within 2 miles of the project area and there would be no impact related to exposing project workers to excessive noise levels from nearby airports.

XIII. POPULATION AND HOUSING: Would the project:	Potentially Significant Impact	Less Than Significant Impact	No Impact
a) Induce substantial 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)?	X		
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	X		
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	X		

Explanations

a) Induce population growth in the project area, either directly or indirectly – *Potentially Significant*

Throughout the project's construction phase, workers would be temporarily employed at the project site. It is anticipated that regional labor could meet the construction workforce requirements. While some workers might temporarily relocate from other areas, the increase would likely be minor and short-term (approximately 2 years). Existing MCWRA staff would conduct long-term operation and maintenance of the project facilities. The project would not result in the construction of new homes. With the exception of any new access roads leading to project facilities (e.g., intake structure at Nacimiento Reservoir) and relocating any existing roads around the perimeter of San Antonio Reservoir, the project would not extend new roads into undeveloped areas. No new long-term employment opportunities or substantial population growth would occur in the project area due to construction of the proposed project.

Once construction is complete, reservoir operations would result in increased water storage in the two reservoirs. Increased water storage and supply could induce population growth in the surrounding areas. Indirect effects on population growth are considered a potentially significant impact that would be evaluated further in the EIR. The EIR analysis would identify any growth impacts as a result of how the water would be managed and applied to meet current and planned future demands, while also meeting other project objectives. The EIR evaluation would take into account recent settlement agreements and adopted land use plans and policies.

In addition, the EIR evaluation would also consider secondary impacts of growth on resources, such as available water resources, air quality, biological resources, cultural/paleontological, prime agricultural lands and agricultural operations, transportation and traffic, and other applicable resource topics.

b, c) Displace substantial numbers of existing housing or substantial numbers of people, necessitating the construction of replacement housing elsewhere – *Potentially Significant*

The proposed project is not expected to displace substantial numbers of existing housing or people such that it would require the construction of new housing. However, once

construction is complete, the potential increase to the maximum water levels at San Antonio Reservoir could impact roads leading to existing scattered homes or private properties and roads would be relocated as necessary to ensure access. It is unlikely that any homes would be affected by increased surface water levels at San Antonio Reservoir. This issue will be evaluated further in the EIR.

XIV. PUBLIC SERVICES: 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 of the public services:	Potentially Significant Impact	Less Than Significant Impact	No Impact
a) Fire protection?		X	
b) Police protection?		X	
c) Schools?		X	
d) Parks?		X	
e) Other public facilities?		X	

Explanations

a-e) Need for Additional or Physically Altered Public Services or Facilities — *Less than Significant*

As noted in Section XIII, *Population and Housing*, above, construction of the proposed project would employ construction workers at the project site, which would likely come from the regional labor force. While some construction workers could temporarily relocate from other areas, the project would not result in a substantial increase in the local population. During construction, potential incidents could require law enforcement, fire protection or emergency services. However, such increases in incidents would not be anticipated to be of a magnitude that they would adversely affect response times or other performance objectives of such public services. Potential conflicts with emergency response plans are addressed in Section IX, *Hazards and Hazardous Materials,* and construction-related effects on emergency access are described in Section XVI, *Transportation and Traffic.*

The proposed project would not result in a permanent increase in the local population. Operation and maintenance activities would be similar to other ongoing maintenance activities and include routine inspections of the Nacimiento intake facility, San Antonio Reservoir outlet facility, tunnel, and modified spillway at San Antonio Reservoir. As a result, the project would not result in substantial increases in the demand for police protection, fire protection, schools, or other public services. Note that secondary effects on public services would be discussed in the EIR's growth analysis, as mentioned in Section XIII, *Population and Housing*, above.

It should be noted that portions of recreational facilities may be inundated as a result of raising the spillway at San Antonio Reservoir. Impacts on parks and recreational resources are discussed in Section XV, *Recreation*, below.

XV. RECREATION: Would the project:	Potentially Significant Impact	Less Than Significant Impact	No Impact
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?	X		
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	X		

Explanations

a) Increase use of existing parks or recreational facilities – *Potentially Significant*

During construction of the proposed project, some recreational facilities near the tunnel inlet at Nacimiento Reservoir may be temporarily closed. There is also the potential that reservoir elevations would be lowered during construction, which could compromise the use of existing boat ramps at the reservoirs, and perhaps cause temporary closure in some instances. Short-term closure of some recreational facilities and uses at the two reservoirs could temporarily increase use of other existing recreational lakes and facilities in Monterey and San Luis Obispo Counties. In addition, the lowering of the water level at both reservoirs during construction, if necessary, could effect on-water recreational opportunities and thereby increase use of other recreational lakes in the project vicinity. While a short-term impact, this impact is considered potentially significant and will be evaluated further in the EIR.

As noted in Section XIII, *Population and Housing*, the proposed project would not result in construction of homes or businesses and therefore would not increase the number of residents in the project vicinity. As such, once the project is completed, the project would not increase the use of recreational parks or other recreational facilities in the area.

b) Creation of new or altered recreational facilities – *Potentially Significant*

Recreational facilities at San Antonio Reservoir currently include a marina, several day use areas, 26 miles of trails, and 500 campsites (See Monterey 2016) on the south shore, and day use areas and a boat launch on the north shore. The proposed project would rarely allow the level of the reservoir to rise approximately 10 feet, but this occasional increase could potentially inundate some of the existing recreational facilities. The impacts to existing recreational facilities associated with San Antonio Reservoir's new inundation level will be analyzed in the EIR. This will include consideration of infrastructure on the north and south shores, including boat ramps, infrastructure associated with the South Shore marina, campgrounds, picnic and swimming areas, and associated infrastructure such as parking lots, Recreational Vehicle hookups, restrooms, showers, campsites, etc. The EIR analysis will consider the elevation of these facilities and identify the need for removal, relocation, and reconstruction where applicable.

Recreational access would also be temporarily restricted around the inlet and outlet portals at Nacimiento and San Antonio Reservoirs during the construction phase. Reservoir dewatering to keep the work area dry could affect recreational opportunities, including swimming, boating, water-skiing, camping, and fishing. This impact is considered potentially significant and will be evaluated further in the EIR.

In addition, potential changes in reservoir levels due to the operation of the project have the potential to result in conflicts with established recreational opportunities at the reservoirs. This impact could be considered potentially significant and will be evaluated further in the EIR.

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

Explanations

a, b) Conflict with applicable circulation plans, ordinances or policies; conflict with an applicable congestion management program – *Potentially Significant*

Construction activities would result in an increase in roadway traffic in both Monterey County and San Luis Obispo County. While the haul route(s) has not yet been determined, initial mobilization and import of construction equipment and materials could use Nacimiento Lake Drive, Vista Road, and possibly Interlake Road. Hauling of spoils from tunneling to disposal sites may also use these roadways. Although not many, there are some residences in the project vicinity that would be temporarily affected by short-term traffic increases.

All construction contractor parking, equipment, and materials would be stored at designated staging areas.

Traffic patterns would return to similar conditions once construction is complete. Operational traffic would include MCWRA personnel conducting inspections and routine maintenance and would be at a level similar to current operations. There would be no permanent changes to level of service standards, travel demands, or congestion after project construction.

Nonetheless, transportation effects during the construction phase (lasting approximately 2 years) constitute a potentially significant impact that will be further evaluated in the EIR.

c) Change in air traffic patterns - *No Impact*

There are no airports in the near vicinity of the project area. As such, the project would not affect existing air traffic patterns during construction.

d) Increased hazards due to design features - *Potentially Significant*

During the construction phase, initial mobilization and import of project materials from off-site locations, and spoils disposal, would result in heavy vehicles and equipment accessing the work areas via Nacimiento Lake Drive, Vista Road, and possibly Interlake Road. While there are few residences nearby, the presence of large, slow-moving equipment along these roads could result in temporary safety hazards.

The project involves construction of new access roads at Nacimiento Reservoir (e.g., near the intake structure) and at San Antonio Reservoir to access the tunnel portal location. The project may also require improvements to existing roads around the perimeter of San Antonio Reservoir to avoid potential inundation due to future reservoir operations and high water flow events. New access roads and necessary roadway improvements would be designed and constructed according to applicable road standards and improved roadways would provide at least the same traffic capacity as the existing roads. While increased hazards due to design of future roads are not expected to be substantial, this impact will be further evaluated in the EIR.

e) Inadequate emergency access – *Potentially Significant*

In the event that project construction requires temporary lane closures or detours on Nacimiento Lake Drive, Vista Road, Interlake Road, and other nearby roads such as the entrance gate to Nacimiento Resort, such closures or detours have the potential to interfere with implementation of County emergency response or emergency evacuation plans, including access for emergency providers (police and fire).

As described above, the project may also require improvements to existing roads around the perimeter of San Antonio Reservoir to avoid future inundation. While the road improvements would likely be designed and constructed according to applicable County road standards, because these designs have not yet been developed, impacts regarding inadequate emergency access are considered potentially significant. This issue will be further evaluated in the EIR.

f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities – *Less than Significant*

The project would not conflict with or prevent implementation of adopted policies, plans, or programs regarding alternative transportation. There are no public transit services that would be affected in the project vicinity. There are no bicycle lanes on Nacimiento Lake

Drive or Vista Road. Existing bicycle lanes on Interlake Road would not be permanently removed or altered as part of the project.

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

Explanations

a, b, e) Exceed wastewater treatment requirements of the Regional Water Quality Control Board, require the construction of new water or wastewater treatment facilities, or result in a determination by the wastewater treatment provider that serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments - *Less than Significant*

During project construction, portable toilets would be provided at the construction work areas and wastewater generated from construction employees would be disposed at an appropriate wastewater treatment facility. The project would comply with all State, Regional Water Quality Control Board and local requirements related to disposal of sewage, and daily wastewater generated at the construction sites would not exceed wastewater treatment requirements. While the project may require construction of new restroom facilities to replace any that would otherwise be affected by the increased reservoir levels at San Antonio Reservoir, the project would not result in the generation of additional wastewater requiring treatment and disposal. As such, the project would have less-than-significant

impacts associated with wastewater treatment requirements and wastewater treatment demands.

c) Require the construction of new stormwater drainage facilities or expansion of existing facilities – *Potentially Significant*

The project may involve construction of new stormwater drainage facilities on new access roads both in the vicinity of Nacimiento Reservoir and San Antonio Reservoir. Aside from new access roads, the project does not include any other facilities that would substantially result in increased impervious surfaces that could increase stormwater flows. See Sections VI, *Geology and Soils*, and IX, *Hydrology and Water Quality,* for further discussion of potential stormwater drainage impacts associated with the project during and after project construction. This impact would be less than significant.

d) Have sufficient water supplies available to serve the project from existing entitlements and resources – *Less than Significant*

During project construction, water needed for dust control purposes would likely be trucked in to the work areas. Operation of the project would not increase water supply demand. The project would increase water supply sustainability for Monterey County by increasing the collective amount of water stored in Nacimiento Reservoir and San Antonio Reservoir.

f, g) Comply with all applicable regulations related to solid waste and have available landfill capacity to accommodate the project's solid waste disposal needs, and comply with federal, state and local statutes and regulations related to solid waste - *Potentially Significant*

Active landfills in Monterey County include the Johnson Canyon Sanitary Landfill and Marina Landfill (CalRecycle 2016a). Landfills in San Luis Obispo County include the City of Paso Robles Landfill, Camp Roberts Landfill, and Cold Canyon Landfill (CalRecycle 2016b).

Project construction would generate solid waste associated with various construction activities. Tunnel construction would involve excavation of a substantial volume of soil, and waste would also be generated from site demolition and modifications due to construction of modifications to the spillway at the San Antonio Reservoir. Although spoil disposal sites have not yet been determined, the majority of spoils removed from the tunnel portals and tunnel excavation are expected to be disposed locally. Some or all of the demolition debris generated by the San Antonio Dam spillway modifications could be recycled, reused, and/or disposed of locally, while other material may require disposal at one of the operating landfills in Monterey County or San Luis Obispo County. However, because the project's soil excavation volumes and other demolition/debris volumes and the extent to which such material could be recycled or reused have not yet been evaluated, impacts on remaining landfill capacity and compliance with applicable solid waste regulations are considered potentially significant, and will therefore, be evaluated further in the EIR.

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

Explanations

a) Potentially Significant Impacts. Construction activities of the proposed project could result in potentially significant impacts on special-status plant and animal species and cultural and historical resources. These issues will be evaluated in the project EIR.

b) Potentially Significant Impacts. As defined by the State of California, cumulative impacts reflect "the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time" (CEQA Guidelines, § 15355[b]).

The degree to which project effects would contribute to a significant cumulative impact will be evaluated in the EIR. To meet the adequacy standard established by the CEQA Guidelines section 15130, the EIR will identify past, present, and reasonably probable future projects producing related or cumulative impacts. Other projects or plans in the geographic scope of the proposed project may include projects in the Salinas River watershed, such as the Salinas Valley Water Project and the Salinas River Stream Maintenance Program.

c) Potentially Significant Impacts. Construction activities of the proposed project could result in direct adverse impacts on people due to effects, such as air pollutant and GHG emissions. Operation of the proposed project could substantially benefit people through providing increased water supply sustainability and enhanced flood protection for the Salinas Valley through increased water storage capacity at San Antonio Reservoir. This topic will be evaluated in the EIR.

C. DETERMINATION

On the basis of this initial evaluation:

	I find that the proposed Project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
	I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions to the project have been made by or agreed to by the Project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
X	I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
	I find that the proposed project MAY have an impact on the environment that is "potentially significant" or "potentially significant unless mitigated" but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards and (2) has been addressed by mitigation measures based on the earlier analysis, as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
	I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the Project, nothing further is required.

David E. Chardavoyne 25 April 2016

Signature Date

David Chardavoyne
General Manager

Monterey County Water
Resources Agency

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