

DEPARTMENT OF TRANSPORTATION

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Governor's Office of Planning & Research

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May 6, 2021

STATE CLEARINGHOUSE

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GTS # 07-MULTIPLE-2021-00231

Vic. SB-192/PM: 20.971

VEN-150/PM: H1.322

Julia Aranda
 Casitas Municipal Water District
 1055 Ventura Avenue
 Oakview, CA 93022

Dear Ms. Aranda:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Ventura-Santa Barbara Counties Intertie Project – Mitigated Negative Declaration (MND). The Project involves the construction and operation of potable water infrastructure to connect the Casitas Municipal Water District (CMWD) and Carpinteria Valley Water District (CVWD) water transmission systems. The proposed project includes between approximately 7,600 to 8,160 linear feet (LF; 1.4 to 1.5 miles) of 16-inch-diameter potable water pipeline, two booster pump stations, and various improvements to infrastructure at existing CMWD facilities. The pipeline would traverse the boundary between Ventura and Santa Barbara counties, and act as a two-way intertie for the transfer of water between CMWD and CVWD. The CMWD is the Lead Agency under the California Environmental Quality Act (CEQA).

General Comments:

As mentioned in the MND, the project site traverses State Routes 192 and 150 in Santa Barbara and Ventura Counties. These facilities are under the jurisdictions of Caltrans Districts 5 and 7.

Project specific comments:**Biological Impacts:**

Mitigation Measure (MM) BIO-6, "Restore Temporary Disturbance to Jurisdictional Waters": The MND states that a Habitat Mitigation and Monitoring Plan (HMMP) shall be prepared. It appears that impacts to jurisdictional areas would occur, but also that a Jurisdictional Delineation (JD) has not been conducted yet. Please provide an estimate of the potentially impacted area for Caltrans review.

MM BIO 7, "Arborist Study": The MND states that "an arborist study should be conducted" prior to a permit being issued, indicating one has not been conducted. Caltrans recommends that an arborist study be performed as soon as possible and sent to us for review. The MND also states that trees such as Walnut, Oak, and Sycamore could be impacted. Please provide an estimate of the number of impacted trees. This estimate could influence this project's level of impact on biological resources.

MM BIO-9, "Pre-Construction Presence/Absence Survey for Special Status Species": Please clarify the purpose of conducting this survey. Legless lizards, if present, would be difficult to detect on such a survey because they live underground. Also, a fence would not prevent a woodrat from returning to its midden if the rat was captured and relocated outside of the fence. Thus, an alternative to installing a fence to protect

woodrats should be identified.

Discussion of Impact B on page 49 (Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?): It is unclear which project alternative would impact which jurisdictional resource. Also, throughout the report, it seems that one project alternative has actually already been selected for implementation.

MM BIO-13, "Jurisdictional Waters Avoidance and Minimization": This states that a "JD shall be completed...." However, it is difficult to assess the level of impact to a resource when a survey of the resource has not been conducted yet. While it is possible for these impacts to be discussed when applying for permits from resource agencies, Caltrans recommends conducting a JD as soon as possible to accurately assess this project's impacts to biological resources. This JD should be conducted in coordination with the Army Corps of Engineers.

Discussion of Impact D on page 51 (Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?): This discussion states that direct or indirect impacts to wildlife movements are not anticipated due to construction or operation and the project would not impede the movement of wildlife throughout the region. However, construction of the proposed project would occur at times within or near a creek, which is known to be used for wildlife movement. Thus, please elaborate on why the proposed project would not impact wildlife movement. Also, if it is true that wildlife movements would not be impacted, then the conclusion should be "No Impact" rather than "Less than Significant Impact".

Discussion of Impact E on page 51 (Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?): While the proposed project does not appear to conflict with any local policies or ordinances protecting biological resources, it also seems that in general, an insufficient amount of data was collected to accurately evaluate impacts to these resources. For instance, Caltrans recommends that an arborist study, as well as a JD for jurisdictional waters avoidance and minimization, be conducted prior to determining this project's biological impacts.

Construction Impacts:

Caltrans supports the implementation of mitigation measure T-1 (Traffic Management Plan) and looks forward to reviewing it.

Permits:

We concur with the following statement: "Pipeline construction along SR 150 and SR 192 is subject to an encroachment permit from Caltrans....". Please be aware that any work within the State's right-of-way, including infrastructure improvements and booster pump station installations, will also require an encroachment permit from Caltrans.

Also, please note that the proposed pipeline will cross a number of culverts on State Routes 150 and 192. For your reference, see the attached map of culvert locations on State Routes 150 and 192. Culvert crossings should be addressed during the Caltrans Encroachment Permit process.

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As a reminder, work within the State's right-of-way must be done to Caltrans' engineering and environmental standards, and at no cost to the State. The conditions of approval and the requirements for the encroachment permit are issued at the sole discretion of the Permits Office, and nothing in this letter shall be implied as limiting those future conditioned and requirements. For more information regarding the encroachment permit process, please visit our encroachment permit website at: <https://dot.ca.gov/programs/traffic-operations/ep>.

Please refer to Chapter 17 of the Project Development Procedures Manual (PDPM) regarding existing and proposed manholes and piping located within or adjacent to the Caltrans right of way. Crossing under the freeway will need to be fully encased from 5 feet outside the State Freeway Right of Way on either side of the freeway <http://www.dot.ca.gov/design/manuals/pdpm/chapter/chapt17.p>.

Plans shall be prepared by a Registered Civil Engineer and shall have a pre-submittal meeting with the District Permit Engineer prior to application due to the complexity of the proposed project. Engineering plan details may be found under "Applications/Forms" at <http://www.dot.ca.gov/trafficops/ep/>.

In addition, Caltrans appreciates the following statement: "Furthermore, for work within Caltrans roadways, including SR 192 and SR 150, the project would comply with all requirements specified in the project's encroachment permit, including workspace and hours restrictions and traffic control requirements."

Finally, any transportation of heavy construction equipment and/or materials which require use of oversized-transport vehicles on State highways will need a Caltrans transportation permit.

If you have any questions about these comments, please contact Emily Gibson, the project coordinator, at Emily.Gibson@dot.ca.gov, and refer to GTS # 07-MULTIPLE-2021-00231.

Sincerely,

Frances Duong for

MIYA EDMONSON
IGR/CEQA Branch Chief in Caltrans District 7

cc: Scott Morgan, State Clearinghouse
Ingrid McRoberts, District 5 IGR coordinator

Attachment Included

