



Lindero Pump Station Rehabilitation (Project No. 592)

Responses to Comments on the Draft Initial Study – Mitigated Negative Declaration (IS-MND)

Final IS-MND

prepared by

Calleguas Municipal Water District

2100 Olsen Road

Thousand Oaks, California 91360

Contact: Jennifer Lancaster, Principal Resource Specialist

prepared with the assistance of

Rincon Consultants, Inc.

180 North Ashwood Avenue

Ventura, California 93003

July 2022

Responses to Comments

This section includes comments received during the circulation of the Draft Initial Study-Mitigated Negative Declaration (IS-MND) prepared for the Lindero Pump Station Rehabilitation (“proposed project”) by Calleguas Municipal Water District (“Calleguas”). The Draft IS-MND was circulated for a 30-day public review period which began on Monday, May 23, 2022, and ended on Tuesday, June 21, 2022. Calleguas received two comment letters on the Draft IS-MND during the comment period, as identified below.

Letter No.	Commenter (Name, Title, Agency, Division)	Page No.
1	Miya Edmonson, LDR/CEQA Branch Chief California Department of Transportation (Caltrans), District 7	2
2	Nicole Collazo, Air Quality Specialist Ventura County Air Pollution Control District (APCD), Planning Division	5

Comments are summarized on the following pages, with a response provided to each, and the comment letters are attached, with numbered brackets included to identify each comment addressed herein.

Letter 1

DEPARTMENT OF TRANSPORTATION

DISTRICT 7
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
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*Making Conservation
a California Way of Life*

June 14, 2022

Jennifer Lancaster
Calleguas Municipal Water District
2100 Olson Road
Thousand Oaks, CA 91360

RE: Lindero Pump Station Rehabilitation
Mitigated Negative Declaration (MND)
SCH # 2022050473
Vic. VEN-023/PM: R5.836
GTS # 07-VEN-2022-00490

Dear Jennifer Lancaster:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced MND. Under the proposed project, a series of improvements and repairs would be implemented at Lindero Pump Station. These improvements include: replacement of existing above-ground horizontal split case pumps with vertical turbine pumps situated primarily below the ground surface; modifications to the existing piping system and replacement of existing control valves; replacement of the existing surge tank air compressors; installation of a removable protective canopy over the pumps to protect the motors from over-heating; replacement of the existing Southern California Edison (SCE) electrical system, and replacement of electrical and controls equipment with new equipment that runs on a standard voltage, including the main transformer, motor control center, and uninterruptible power supply; installation of a new stationary diesel backup generator. The Calleguas Municipal Water District is the Lead Agency under the California Environmental Quality Act (CEQA).

The project site is approximately 0.8 mile from the State Route 23 (SR-23) North onramp on East Avenida De Los Arboles Avenue. After reviewing the MND, construction of the proposed project would increase vehicle trips to and from the project site due to construction worker trips, as well as material and equipment deliveries. Vehicle Miles Travelled (VMT) associated with these activities would cease once construction is completed and VMT levels would return to pre-project conditions. Following the completion of construction activities, operation and maintenance of the pump station would be consistent with existing conditions, with the exception that fewer repairs are anticipated due to the improved performance and reliability to be provided by the project. Therefore, because VMT from construction would be temporary and short-term and limited to the active construction period and operation and maintenance activities would likely be less frequent than under existing conditions, no impact associated with VMT

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and respects the environment."*

Calleguas Municipal Water District
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Jennifer Lancaster
June 14, 2022
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would occur and the proposed project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3(b). The following information is included for your consideration.

- 1 Any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. Caltrans recommends that the Project limit construction traffic to off-peak periods to minimize the potential impact on State facilities. If construction traffic is expected to cause issues on any State facilities, please submit a construction traffic control plan detailing these issues for Caltrans' review.

- 2 Finally, any work completed on or near Caltrans' right of way may require an encroachment permit. However, the final determination on this will be made by Caltrans' Office of Permits. This work would require additional review and may be subject to additional requirements to ensure current design standards and access management elements are being addressed. For more information on encroachment permits, see: <https://dot.ca.gov/programs/traffic-operations/ep>.

If you have any questions, please feel free to contact Karen Herrera, the project coordinator, at Karen.Herrera@dot.ca.gov and refer to GTS # 07-VEN-2022-00490.

Sincerely,

MIYA EDMONSON
LDR/CEQA Branch Chief

cc: State Clearinghouse

*"Provide a safe and reliable transportation network that serves all people
and respects the environment."*

Letter 1 - Responses

COMMENTER: Miya Edmonson, LDR/CEQA Branch Chief
Caltrans, District 7

DATE: June 14, 2022

1. The commenter states that a Caltrans permit will be required for any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways. Caltrans recommends that construction traffic be limited to off-peak periods and, if construction traffic would cause issues on any State facilities, a construction traffic control plan detailing these issues should be submitted to Caltrans for review.

Calleguas acknowledges the information and guidance regarding Caltrans requirements for the use of State highways. No revisions to the Draft IS-MND are necessary, and no errata are associated with this comment.

2. The commenter states that any work completed on or near Caltrans' right-of-way may require an encroachment permit, and that the determination as to whether such a permit is required will be made by Caltrans' Office of Permits. The commenter provides a web address for more information on encroachment permits, and advises that should a permit be required, additional review may be necessary to ensure current [Caltrans] design standards and access management elements are being addressed.

Calleguas acknowledges the information and guidance regarding Caltrans encroachment permit requirements. No revisions to the Draft IS-MND are necessary, and no errata are associated with this comment.

Letter 2



Ventura County
Air Pollution
Control District


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Ali Reza Ghasemi, PE
Air Pollution Control Officer

**VENTURA COUNTY
AIR POLLUTION CONTROL DISTRICT**
Memorandum

TO: Jennifer Lancaster, Principal Resource Specialist

DATE: June 20, 2022

FROM: Nicole Collazo, Air Quality Specialist, VCAPCD Planning Division 

SUBJECT: Lindero Pump Station Rehabilitation Mitigated Negative Declaration

Air Pollution Control District (APCD) staff has reviewed the subject Notice of Intent (NOI) to adopt a Mitigated Negative Declaration (MND) for the project referenced above. The project will provide necessary repairs and improvements to the existing Lindero Pump Station in Thousand Oaks. Lindero Pump Station is a critical component of Calleguas' water infrastructure system and Calleguas' reliable conveyance of potable water supply to the Oak Park Region. The project is located on Erbes Road at East Avenida De Las Flores in Thousand Oaks. The Lead Agency for the project is the Calleguas Municipal Water District.

General Comments

- 1 Item 1- Page 23. The project proposes to demolish approximately "4,340 ft² of building and pump infrastructure". The demolition activities will have to comply with APCD requirements for asbestos abatement per APCD Rule 62.7, *Asbestos- Demolition and Renovation*. This includes meeting the notification requirements to APCD and emission control requirements in Rule 62.7.C.1. We recommend adding this rule to the list of applicable rules on Page 22 and possibly amending the applicable subsection for toxics exposure.
- 2 Item 2- Page 26. Construction-related TAC Emissions. We recommend a best management practice measure for off-road construction equipment to be at a minimum Tier 3 EPA rating for diesel engines and revise this section of the MND accordingly along with developing a standard condition of approval to make the measure enforceable.
- 3 The construction schedule is expected to last approximately 1 year. The exposure of toxics, such as diesel particulate matter and nitrous oxides, from daily use of construction equipment to any sensitive receptors residing nearby the construction site (Los Cerritos Middle School, Boys and Girls Club, Sapwi Trails Community Park, residences), may have a health impact, with emphasis on infants age 0-2 years of age which have higher breathing rates and are more susceptible to exposure of air pollutants.
- Item 3- As the MND stated, the proposed emergency diesel generator will require a stationary source APCD Permit to Operate. As of June 20, 2022, the Engineering Division has not received

- 4 a permit application for the diesel engine powering the generator. We advise the applicant to submit the required documentation and application for an Authority to Construct, which must be issued *prior to* installation and construction of said equipment. A Permit to Operate likewise must be issued prior to operation of the diesel generator. Please contact Mr. Chris Harlin, Permit Processing Specialist, at chris@vcapcd.org or 805-303-3683 to ensure the equipment will be operating according to APCD's rules and regulations, including Rule 10, *Permits Required*.

Thank you for the opportunity to comment on the project. If you have any questions, you may contact me at nicole@vcapcd.org.

Letter 2 - Responses

COMMENTER: Nicole Collazo, Air Quality Specialist
Ventura County APCD, Planning Division

DATE: June 20, 2022

1. The commenter states that on page 23 of the Draft IS-MND, description is provided of project-related demolition activities (to demolish “4,340 ft² of building and pump infrastructure”) that will be required to comply with APCD requirements for asbestos abatement per APCD Rule 62.7, *Asbestos- Demolition and Renovation*, and recommends adding this rule to the list of applicable rules on page 22, and “possibly amending the applicable subsection for toxics exposure.”

In response to this comment, Ventura County APCD Rule 62.7 has been added to the list of “Applicable VCAPCD Rules and Regulations” presented on page 22 of the IS-MND. The discussion of potential impacts associated with toxic air contaminants (TAC), as presented on pages 25 through 27 of the Draft IS-MND, has not been revised in response to this comment. As discussed on the aforementioned pages, compliance of project activities with applicable laws and regulations would reduce potential impacts, including those associated with TAC, to a less-than-significant level.

2. The commenter recommends that on page 26 of the Draft IS-MND, under the discussion of construction-related TAC emissions, a revision should be incorporated to include a best management practice requiring off-road construction equipment to be a minimum Tier 3 EPA rating, and that a condition of approval should be developed to make this measure enforceable.

Page 26 of the IS-MND has not been revised to include a requirement for Tier 3 construction engines, because the potential impact was determined to be less than significant without mitigation. No revisions have been incorporated in response to this comment.

3. The commenter states that the exposure of toxics from daily use of construction equipment could have a health impact on nearby sensitive receptors, with emphasis on infants aged 0-2 years of age, and identifies sensitive receptors including Los Cerritos Middle School, Boys and Girls Club, Sapwi Trails Community Park, and residences.

Calleguas acknowledges this comment. As stated in the second full paragraph on page 26 of the Draft IS-MND, the maximum exhaust emissions would occur during the first 150 days of the potentially year-long construction period and emissions would decrease for the remaining construction period as construction activities such as building construction and architectural coating would require less intensive construction equipment. Health risk calculations determined that diesel particulate matter generated by construction emissions would not result in significant impacts, including to sensitive receptors associated with the aforementioned land uses. No revisions have been incorporated in response to this comment.

4. The commenter states that the proposed emergency diesel generator will require a stationary source APCD Permit to Operate and, as of June 20, 2022, the APCD Engineering Division has not received a permit application for the diesel engine powering the generator. The commenter advises that Calleguas submit the required documentation and application for an Authority to

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Construct, which must be issued prior to installation and construction of the equipment, and that a Permit to Operate must be issued prior to operation of the equipment.

Calleguas acknowledges this comment. As stated on page 9 of the Draft IS-MND, the Ventura County APCD is identified as an “other public agency whose approval is required” and is responsible for providing a Permit to Construct and a Permit to Operate for the project’s new diesel generator. Calleguas will comply with these requirements, which is a ministerial action. No revisions have been incorporated in response to this comment.