

EXHIBIT A

CEQA FINDINGS

Santa Felicia Dam Safety Improvement Project SCH# 2017041005

A. Findings for significant environmental effects of the proposed project that have been mitigated to a less than significant level.

1. Air Quality

- a. **Impact AQ-1.** Construction of the Project would result in a temporary increase in criteria pollutant emissions from engine exhaust during on-road vehicle, truck trips and off-road construction equipment operations, and fugitive dust during earthmoving activities. This impact is significant but mitigable to a less than significant level. With the implementation of Mitigation Measure AQ-1: Implement ROC and NOx Construction Mitigation, described in Final EIR Section 5.4.3.2, construction criteria pollutant emissions would be mitigated to a less than significant level. Refer to Section 5.4.3.2 of the Final EIR.
- b. **Impact AQ-2.** Construction activities associated with the Project could potentially generate substantial volumes of fugitive dust during earth-moving activities, such as excavating an estimated 72,000 cubic yards of material from the adjacent slope to facilitate the widened channel as part of the option to widen the spillway chute, drilling and blasting associated with the option to lower the spillway chute, and grading associated with realigning access roads. This impact is significant but mitigable to a less than significant level. With implementation of Mitigation Measure AQ-2: Prepare and Implement a Fugitive Dust Control Plan, impacts would be mitigated to a less than significant level. This mitigation measure would feasibly mitigate significant impacts related to fugitive dust emissions and would minimize potential risks associated with Valley Fever. Refer to Section 5.4.3.2 of the Final EIR.

2. Biological Resources

- a. **Impact BIO-1.** Impacts on special-status plant species could include crushing, damaging, or removing plants during construction; population fragmentation; the introduction of non-native species that may out-compete native plant species; and runoff or sedimentation and erosion that could adversely affect plant populations by altering site conditions. Construction-related dust

could also hinder normal plant growth. This impact is significant but mitigable to a less than significant level. With implementation of Mitigation Measure BIO-1: Conduct Pre-construction Vegetation Surveys and BIO-2: Identify and Implement BMPs, impacts would be mitigated to a less than significant level by identifying these species and ensuring they are avoided and protected during construction. Refer to Final EIR Section 5.5.4.2.

- b. **Impact BIO-2.** The project would cause a temporary disturbance or permanent loss of riparian and other sensitive native plant communities. This impact is significant but mitigable to a less than significant level. With implementation of Mitigation Measure BIO-1, BIO-2, BIO-3: Prepare and Implement an Upland Revegetation and Aquatic, Riparian, and Wetland Restoration Plan and BIO-4: Design and Construct a Geomorphically Stable Channel Connecting the New Outlet Works Release Point to the Main Lower Piru Creek Channel, impacts would be mitigated to a less than significant level. The physical area of impact to sensitive plant communities is relatively small, similar or higher quality habitat is readily available in the surrounding area, and implementation of the measures described above would mitigate potential impacts. Refer to Final EIR Section 5.5.4.2.
- c. **Impact BIO-3.** The Project would result in temporary disturbance to special-status, migratory, or nesting birds. Construction during the breeding season could cause nest removal or disturbance leading to nest failure. Indirect impacts, such as truck and construction equipment noise and ground disturbance, could also cause nest abandonment and reduced reproductive success. Direct impacts on riparian habitat would result from abandonment of approximately 480 feet of the existing lower Piru Creek release channel due to outlet works relocation, resulting in significant alteration of riparian habitat that represents suitable nesting habitat for various special-status birds. This impact is significant but mitigable to a less than significant level. With implementation of Mitigation Measure BIO-1 through BIO-4 and BIO-5: Protection of Nesting Birds, impacts would be mitigated to a less than significant level. Refer to Final EIR Section 5.5.4.2.
- d. **Impact BIO-5.** Construction of the Project would result in disturbance to special-status amphibians and reptiles. This impact is significant but mitigable. With implementation of Mitigation Measure BIO-2, BIO-3, BIO-4, and BIO-6: Conduct Pre-Construction Special-status Amphibian and Reptile Surveys and BIO-7: Amphibian and Reptile Relocation during Dewatering of the

Portion of Lower Piru Creek that will be Abandoned, impacts would be less than significant. Refer to Final EIR Section 5.5.4.2.

- e. **Impact BIO-6.** Project relocation of the outlet works would impact special-status fish species and their critical habitat. Relocation of the existing outlet works system from the right abutment to the left abutment would result in the dewatering of between 480-feet and 1,200-feet of existing channel in lower Piru Creek (depending on the final design), which is designated critical habitat for southern California steelhead. This impact is significant but mitigable to a less than significant level. With implementation of Mitigation Measure BIO-4 and BIO-8: Fish Relocation during Dewatering of the Portion of Lower Piru Creek that will be Abandoned, impacts would be less than significant. Refer to Final EIR Section 5.5.4.2.
- f. **Impact BIO-7.** Project relocation of the outlet works would affect special-status fish species due to impaired water quality. Following completion of the new outlet works system; water releases from Santa Felicia Dam would be shifted from the existing outlet works to the new outlet works. The initial watering of the channel connecting the new outlet works system to the lower Piru Creek channel could temporarily result in degraded water quality (e.g., high turbidity) in the channel and downstream. These initial flows could cause temporary instream and lateral scour, flushing sediment and debris through the channel to downstream habitats, resulting in a significant impact to special-status fish species, such as Santa Ana sucker and Arroyo chub. This impact would be significant but mitigable to a less than significant level. With implementation of Mitigation Measure BIO-9: Implement Turbidity Controls, impacts would be less than significant. Refer to Final EIR Section 5.5.4.2.
- g. **Impact BIO-8.** Based on observations during the preliminary reconnaissance surveys of the Project area, the Project would have temporary and permanent impacts on jurisdictional Waters of the US and Waters of the State. This impact would be significant but mitigable to a less than significant level. With implementation of Mitigation Measure BIO-4, impacts would be less than significant. Refer to Final EIR Section 5.5.4.2.

3. Cultural Resources

- a. **Impact CUL-2.** Project construction could result in the destruction of or damage to presently undocumented cultural resources. Subsurface disturbances during construction could potentially

destroy or damage undiscovered prehistoric or historic cultural resources. This impact would be significant but mitigable to a less than significant level. With implementation of Mitigation Measure CUL-1: Follow Inadvertent Discovery Procedures, impacts would be less than significant. Refer to Final EIR Section 5.6.5.2.

- b. **Impact CUL-4.** Project ground-disturbing activities could encounter and damage or destroy unique paleontological resources. This impact is significant but mitigable to a less than significant level. With implementation of Mitigation Measure CUL-2: Follow Procedures for Encountering Fossil Remains, impacts would be less than significant. Refer to Final EIR Section 5.6.5.2.

4. **Geology and Soils**

- a. **Impact GEO-2.** The Project would result in substantial soil erosion or the loss of topsoil. The new outlet works system would be constructed along the left abutment of Santa Felicia Dam and the existing outlet works on the right abutment of the dam would be decommissioned. The shift from the right abutment to the left abutment would result in the dewatering of between 480 feet and 1,200 feet of existing channel in lower Piru Creek (depending on the final design) that is situated between the existing outlet works and the confluence of the discharge channel associated with the new outlet works. This component of the Project would alter the existing drainage pattern downstream of Santa Felicia Dam. This impact is significant but mitigable to a less than significant level. With implementation of Mitigation Measure BIO-4, impacts would be less than significant. Refer to Final EIR Section 5.7.3.2.

5. **Hazards and Hazardous Materials**

- a. **Impact HZ-1.** The Project could create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Accidental discharge of hazardous materials or inappropriate disposal of hazardous materials during construction could result in a hazard to the public or the environment. This impact is significant but mitigable to a less than significant level. With implementation of Mitigation Measure HZ-1: Worker Environmental Awareness Plan (WEAP), impacts would be less than significant. Refer to Final EIR Section 5.9.3.2.
- b. **Impact HZ-2.** The Project could 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. This impact is significant but mitigable to a less than significant level. With implementation of Mitigation Measure HZ-1, impacts would be less than significant. Refer to Final EIR Section 5.9.3.2.

- c. **Impact HZ-3.** The Project is 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, could create a significant hazard to the public or the environment. The results of Cortese List (Government Code Section 65962.5) database searches identified one closed LUST site that has been remediated with no further action required. During construction activities, the District or its contractor may encounter subsurface structures, such as pipelines or unknown/undetected storage tanks, or materials resulting in a release of contaminants such as lead, asbestos, pesticides, or fuel that may be associated with past uses. This impact is significant but mitigable to a less than significant level. With implementation of Mitigation Measure HZ-1: Worker Environmental Awareness Plan (WEAP), impacts would be less than significant. Refer to Final EIR Section 5.9.3.2.
- d. **Impact HZ-5.** The Project could 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. The Project is located in an area that is designated by CAL FIRE as a Very High Fire Hazard Severity Zone due to flammable native vegetation, dry weather conditions, and high winds. Construction activities associated with the proposed Project would increase fire risk during refueling, vehicle and equipment use, welding, vegetation clearing, worker cigarette smoking, and other activities. This impact is significant but mitigable to a less than significant level. With implementation of Mitigation Measure HZ-3: Fire Control and Emergency Response Plan, impacts would be less than significant. Refer to Final EIR Section 5.9.3.2.

6. Hydrology and Water Quality

- a. **Impact HWQ-2.** The Project would substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site. The new outlet works system would be constructed along the left abutment of Santa Felicia Dam and the existing outlet works on the right abutment of the dam would be decommissioned. The shift from the right

abutment to the left abutment would result in a modification of lower Piru Creek channel downstream of the dam. Specifically, this change would result in the dewatering of between 480-feet and 1,200-feet of existing channel in lower Piru Creek (depending on the final design) that is situated between the existing outlet works and the confluence of the new discharge channel that will be constructed to connect the new water release point to the main lower Piru Creek channel. This impact is significant but mitigable to a less than significant level. With implementation of Mitigation Measure BIO-4, impacts would be less than significant. Refer to Final EIR Section 5.10.3.2.

- b. **Impact HWQ-3.** The Project would substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in flooding on- or off-site. The new outlet works system would be constructed along the left abutment of Santa Felicia Dam and the existing outlet works on the right abutment of the dam would be decommissioned. The shift from the right abutment to the left abutment would result in a modification of lower Piru Creek channel downstream of the dam. Specifically, this change would result in the dewatering of between 480-feet and 1,200-feet of existing channel in lower Piru Creek (depending on the final design) that is situated between the existing outlet works and the confluence of the new discharge channel that will be constructed to connect the new water release point to the main lower Piru Creek channel. This impact is significant but mitigable to a less than significant level. With implementation of Mitigation Measure BIO-4, impacts would be less than significant. Refer to Final EIR Section 5.10.3.2.

- c. **Impact HWQ-4.** The Project would result in a substantial reduction in geomorphic function (i.e., channel stability) in lower Piru Creek. The new outlet works system would be constructed along the left abutment of Santa Felicia Dam and the existing outlet works on the right abutment of the dam would be decommissioned. The shift from the right abutment to the left abutment would result in a modification of lower Piru Creek channel downstream of the dam. Specifically, this change would result in the dewatering of between 480-feet and 1,200-feet of existing channel in lower Piru Creek (depending on the final design) that is situated between the existing outlet works and the confluence of the new discharge channel that will be constructed to connect the new water release point to the main lower Piru Creek channel. This impact is significant but mitigable to a less than significant level. With implementation of Mitigation Measure BIO-4, impacts would be less than significant. Refer to Final EIR Section 5.10.3.2.

B. Significant unavoidable environmental effects of the proposed project for which sufficient mitigation is not available.

The Final EIR identified four (4) significant, unavoidable, adverse project and/or cumulative related environmental impacts associated with the proposed project that cannot be mitigated to levels of insignificance because the adoption of mitigation measures is not feasible. These significant and unavoidable impacts are as follows:

1. Noise

- a. **Impact NOISE-1.** The Project would expose persons to, or generate, noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. Mitigation Measure NOISE-1: Noise Reduction and Control Practices would reduce noise and annoyance when operations are within approximately 2,500 feet of a receptor during construction activities. Implementation of this mitigation measures would decrease construction-related noise to the extent feasible. However, there is a potential for noise thresholds to be exceeded at sensitive receptors. Therefore, after implementation of mitigation measures, the impact would remain significant and unavoidable. Refer to Section 5.13.3.2.
- b. **Impact NOISE-3.** The Project would cause substantial temporary or periodic increases in ambient noise levels in the Project vicinity above levels existing without the Project. The highest noise levels at the nearest sensitive receptors were calculated to be 65.3 dBA during realignment of the road associated with the widening of the spillway. For the spillway deepening option, the highest noise levels at the nearest sensitive receptor were calculated to be 63.9 dBA during demobilization and reclamation activities. Implementation of this mitigation measures would decrease construction-related noise to the extent feasible. Implementation of Mitigation Measure NOISE-1 would reduce noise and operations when operations are within approximately 0.5 mile (2,500 feet) of a receptor during construction activities. However, there is a potential for noise thresholds to be exceeded at sensitive receptors. Therefore, after implementation of mitigation measures, the impact would remain significant and unavoidable.

2. Recreation

- a. **Impact REC-1.** The Project would alter recreational access for boating. Construction efforts associated with the proposed Project

would temporarily alter the existing recreational resources of the Lake Piru Reservoir through the lowering of the reservoir to 950 feet msl or lower to accommodate construction activities. This water level is below the current minimum pool elevation of 980 feet msl and would require the temporary closure of recreational activities in the lake (i.e., recreational boating, fishing, swimming, etc.), as well as whitewater boating in lower Piru Creek for up to 21 months during the construction period. No mitigation measures are available to minimize these adverse effects during construction. Therefore, temporary impacts to recreational access for boating would be significant and unavoidable. The water supply to the recreational facilities, including campgrounds and irrigation systems would be modified during the construction. The lower reservoir levels would push the water system intake to its hydraulic limits, assuming no dramatic changes in the sediment elevations beneath the pump barge. Refer to Final EIR Section 5.16.3.2.

- b. **Impact REC-2.** The Project could reduce the quality of recreational experiences. Project construction would result in temporary impacts to recreation at Lake Piru Reservoir. During construction, the water level in the reservoir would be lowered to 950 feet msl or lower to accommodate construction activities. This water level is below the current minimum pool elevation of 980 feet msl and would require the temporary closure of recreational activities in the lake (i.e., recreational boating, fishing, swimming, etc.) as well as whitewater boating in lower Piru Creek during the construction period. In addition, water supply to the recreational facilities would be disconnected during the construction activities. Access to recreational facilities located within Lake Piru Recreation Area may also be temporarily restricted due to construction vehicles and equipment. No mitigation measures are available to minimize these adverse effects during construction. Therefore, temporary impacts to the quality of the recreational experience at the Lake Piru Reservoir and in Piru Creek would be significant and unavoidable. Refer to Final EIR Section 5.16.3.2.
- C. Findings for less than significant environmental effects of the proposed project.**

1. Aesthetics

- a. **Impact AES-1:** The construction phase for both components of the Project is anticipated to last 48 months, after which all disturbed areas would be reclaimed. Viewers from Piru Canyon Road would experience temporary adverse impacts; however, construction area represents a small portion of the overall viewshed experienced by

travelers along Piru Canyon Road. Once operational, the proposed facilities would blend in with the existing dam infrastructure. This impacts would be less than significant. Refer to Section 5.2.3.2 of the Final EIR.

- b. **Impact AES-2:** The visual character of the site from Piru Canyon Road, Rancho Temescal, and from hiking trails along Lake Piru Reservoir would be disturbed during construction. Further, Lake Piru Reservoir would be temporarily lowered during the construction period. After the anticipated 48-month construction period, all disturbed areas would be reclaimed and water levels within Lake Piru Reservoir would be managed in accordance with existing operations. This impact would be less than significant. Refer to Section 5.2.3.2 of the Final EIR.
- c. **Impact AES-3:** Construction equipment would introduce a new, temporary source of glare during daytime hours. In addition, certain tasks may require nighttime construction, which would introduce a new light source at night. However, these impacts would be less than significant as they would be localized and temporary, occurring only during construction hours and when nighttime construction is necessary, and no building materials would generate reflection during operations. Refer to Section 5.2.3.2 of the Final EIR.

2. Agricultural Resources

- a. The Santa Felicia Dam Safety Improvement Project EIR did not identify any impacts to agriculture, as the Project would not convert farmland, conflict with existing agriculture or forest zoning, result in the loss or conversion of forest or result in indirect conversion of farmland.

3. Air Quality

- a. **Impact AQ-3:** The Project would not conflict with or obstruct implementation of the Ventura County AQMP and would not result in long-term increases in criteria pollutant emissions. Accordingly, the Project's incremental contribution to criteria pollutant emissions is not cumulatively considerable; therefore, cumulative impacts of Project construction on criteria air pollutants would be less than significant. Refer to Section 5.4.3.2 of the Final EIR.
- b. **Impact AQ-4:** Because all Project construction activities would be short-term compared to long-term exposure criteria (70 years), no significant exposures (i.e., defined in the Air Quality Management

Plan as exposure for at least 14 percent of one's lifetime) to diesel engine exhaust or fugitive dust would occur. Accordingly, the Project would not expose sensitive receptors to substantial pollutant concentrations, and impacts would be less than significant. Refer to Section 5.4.3.2 of the Final EIR.

- c. **Impact AQ-5:** Diesel fuel would be used in trucks and construction equipment. California ultralow sulfur diesel fuel with a maximum sulfur content of 15 parts per million by weight would be required to be used in all diesel-powered equipment, which would minimize emissions of sulfurous gases (SO₂, hydrogen sulfide, carbon disulfide, and carbonyl sulfide) and, thus, would minimize odors. Additionally, any odors emitted during construction would be temporary and localized. Therefore, Project impacts would be less than significant. Refer to Section 5.4.3.2 of the Final EIR.

4. Biological Resources

- a. **Impact BIO-4.** The Project would result in temporary disturbance to special-status mammals. There are no special-status mammals known to occur or with a high potential to occur in the Project area. Special-status mammals with a moderate potential to occur in the Project area include the pallid bat, western mastiff bat, San Diego black-tailed jackrabbit, San Diego desert woodrat, and American badger. The bats could forage in the Project area but are not expected to roost or breed in the area due to lack of suitable habitat. Impacts on foraging would be less than significant due to the relatively small area and short duration of construction activities as well as availability of other foraging areas nearby. Few individuals of the jackrabbit, woodrat, and badger are expected to use the Project area, and these mobile species are expected to avoid the construction area, resulting in less than significant impacts.
- b. **Impact BIO-9.** The Project would temporarily disturb wildlife movement and nursery sites. Lower Piru Creek and the Santa Felicia Dam spillway channel represent wildlife corridors within the Project area. However, Santa Felicia Dam and its associated infrastructure currently create a barrier to some wildlife (primarily non-avian terrestrial species) movement. While construction of the Project may temporarily cause an additional disruption to local wildlife movements, the impact would be less than significant due to the limited spatial and temporal impacts from construction and lack of current movement corridors through this area. Refer to Final EIR Section 5.5.4.2.

- c. **Impact BIO-10.** The Project would be consistent with local policies and ordinances protecting biological resources. This impact would be less than significant.

5. Cultural Resources

- a. **Impact CUL-1.** Project construction would alter the spillway and outlet works of Santa Felicia Dam, which has been recommended eligible for listing on the California Register of Historic Places. However, because the dam's function would remain unchanged, the dam's eligibility for listing on the California Register of Historic Places would not be affected, and this impact would be less than significant.
- b. **Impact CUL-3.** Project ground-disturbing activities could encounter presently undocumented human remains. However, compliance with regulatory requirements would ensure impacts are less than significant.

6. Geology and Soils

- a. **Impact GEO-1.** The Project would reduce exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, ground-shaking, liquefaction, or landslides. This would be a less than significant impact.
- b. **Impact GEO-3.** The Project is located on a geologic unit or a soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on or offsite landslide, lateral spreading, subsidence, liquefaction or collapse. Given the low probability of an earthquake occurring during construction and Project's objectives to enhance the integrity and stability of the dam to withstand design flood events and seismic hazards, impacts would be less than significant.

7. Greenhouse Gas Emissions

- a. **Impact GHG-1.** The Project would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment. Project component options would not exceed the significance threshold of 10,000 metric tons of carbon dioxide equivalent, and GHG emissions during operations and maintenance would remain unchanged from current conditions. Impacts would be less than significant.

8. Hazards and Hazardous Materials

- a. **Impact HZ-4.** The Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan activities. Travel routes for emergency vehicles would remain unobstructed and adequate, and existing dam operations would not change following Project construction. This impact would be less than significant.

9. Hydrology and Water Quality

- a. **Impact HWQ-1.** The Project would not violate any water quality standards or waste discharge requirements. Through compliance with National Pollutant Discharge Elimination System Construction General Permit requirements, including the preparation and implementation of a Stormwater Pollution Prevention Plan and Best Management Practices, potential violations of water quality standards and/or waste discharge requirements would be minimized. Operation of the modified spillway and new outlet works would not impact water quality standards or waste discharge requirements. Impacts would be less than significant.
- b. **Impact HWQ-5.** The Project would not create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff. Through compliance with the National Pollutant Discharge Elimination Construction General Permit requirements including the preparation and implementation of a Stormwater Pollution Prevention Plan and Best Management Practices, construction of the Project is not expected to provide substantial sources of polluted runoff. The Project does not include any changes to the current operations or the existing Project permit requirements. Impacts would be less than significant.
- c. **Impact HWQ-6.** The Project would not otherwise substantially degrade water quality. During construction, water releases are planned to continue per existing operations, and the Project does not include any changes to the current operations or the existing Project permit requirements. Impacts would be less than significant.
- d. **Impact HWQ-7.** The Project would not reduce the capacity of flood control facilities and watercourses. The construction timing and approach would be developed in consultation with the California Department of Water Resources Division of Safety of Dams and the

Federal Energy Regulatory Commission to minimize potential risks of flooding during the construction activities by lowering the water levels in Lake Piru Reservoir to provide additional storage capacity and using the existing outlet works and, following completion, the new outlet works system to maintain lower water levels should high flows occur. The Project would increase the design capacity of the spillway to convey the revised inflow design flood to meet current regulatory requirements and construct a new outlet works system to protect the integrity of Santa Felicia Dam in the case of a seismic event and create a more reliable system to deliver water releases downstream of the dam. Impacts would be less than significant.

- e. **Impact HWQ-8.** The Project would reduce exposure of people or structures to a significant risk of flooding because of dam or levee failure. The construction timing and approach would be developed in consultation with the California Department of Water Resources Division of Safety of Dams and the Federal Energy Regulatory Commission to minimize potential risks of flooding during the construction activities by lowering the water levels in Lake Piru Reservoir to provide additional storage capacity and using the existing outlet works and, following completion, the new outlet works system to maintain lower water levels should high flows occur. The Project would increase the design capacity of the spillway to convey the revised inflow design flood to meet current regulatory requirements and construct a new outlet works system to protect the integrity of Santa Felicia Dam in the case of a seismic event and create a more reliable system to deliver water releases downstream of the dam. Impacts would be less than significant.
- f. **Impact HWQ-9.** The Project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (i.e., 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. Impacts would be less than significant.

10. Land Use and Planning

- a. The Santa Felicia Dam Safety Improvement Project EIR did not identify any significant impacts to land use and planning.

11. Mineral Resources

- a. The Santa Felicia Dam Safety Improvement Project EIR did not identify any significant impacts to mineral resources.

12. Noise

- a. **Impact NOISE-2.** The Project would expose people to, or generate, excessive vibration or ground-borne noise levels. Although vibrations may be perceivable during construction, the potential risk of architectural or structural damaged is not considered significant, and operations and maintenance would be unchanged from current conditions. Impacts would be less than significant.

13. Population and Housing

- a. The Santa Felicia Dam Safety Improvement Project EIR did not identify any significant impacts to population and housing.

14. Public Services

- a. The Santa Felicia Dam Safety Improvement Project EIR did not identify any significant impacts to public services. However, Mitigation measure HZ-3 and TRAN-2 would further reduce already less than significant impacts.

15. Transportation and Traffic

- a. **Impact TRAN-1.** The Project would not substantially increase hazards due to a design feature or incompatible uses. The Project would not modify any dam access points or external roadways. However, the Project would make various changes to roads within the dam property boundary. Specifically, the Spillway Widening Option would replace the existing one-lane bridge above the spillway and realign a portion of internal road to the west of the bridge, east of Piru Canyon Road. The internal roadway improvements are being designed to comply with relevant engineering criteria and other applicable regulations, which include traffic safety. Accordingly, Project construction would not introduce any design features that would substantially increase hazards. The Project would temporarily increase truck traffic on Piru Canyon Road, and possible safety concerns could arise from reduced roadway visibility caused by the trucks and/or motorists attempting to pass the trucks. However, trucks would be routed to the southern dam access points, thus minimizing the volume of truck traffic on the segment of Piru Canyon Road to the north, which is characterized by rolling terrain and sharp turns. This impact is less than significant; however, Mitigation Measure TRAN-1: Temporary Signage is recommended to reduce any potential safety hazards.
- b. **Impact TRAN-2.** The Project would not result in inadequate emergency access. As discussed above, the Project would not

modify any dam access points or external roadways, and Piru Canyon Road is expected to remain open to traffic during construction. Therefore, the Project would not prevent emergency vehicle access via Piru Canyon Road to the north and to the south of the Project. However, the presence of construction-related traffic on Piru Canyon Road may slow down emergency vehicles if there is not sufficient roadway shoulder to allow the construction vehicle to safely pull out of the lane to allow the emergency vehicle to pass. The overall volume of estimated truck traffic is relatively light, or less than five trucks per hour assuming a uniform distribution over an eight-hour work day. Moreover, as noted in Impact TRAN-1 above, truck traffic would be routed to the southern dam access points, which are located on relatively flat terrain with minimal obstructions to sight distance and with wide unpaved roadway shoulders to accommodate vehicles pulling off the roadway. Although construction activities within the immediate vicinity of Santa Felicia Dam could temporarily block first responders to an emergency within the site, there are multiple alternative access points that can be used for emergency access. These include the access point immediately south of Rancho Temescal, immediately west of the spillway, and the Santa Felicia Fire Road providing access to the east side of the dam. This impact is significant but mitigable to a less than significant level. With implementation of Mitigation Measure TRAN-2: Emergency Vehicle Access and TRAN-3: Fire Control and Emergency Response Plan, impacts would be less than significant. Refer to Final EIR Section 5.17.3.2.

16. Tribal Cultural Resources

- a. The Santa Felicia Dam Safety Improvement Project EIR did not identify any impacts to tribal cultural resources, as cultural resource surveys of the area of potential effects did not identify any cultural resources. In addition, tribal representatives have not indicated the presence of cultural resources in the area of potential effects. Because no tribal cultural resources have been identified in the area affected by the Project, no impacts would occur.

17. Utilities and Service Systems

- a. The Santa Felicia Dam Safety Improvement Project EIR did not identify any impacts to utilities and service systems, as the Project would not exceed wastewater treatment requirements, require or result in construction or expansion of new water, wastewater treatment, or stormwater drainage facilities, would have sufficient water supplies available, would not result in a determination by a wastewater treatment provider that the it has inadequate capacity

to serve the project, would be served by a landfill with sufficient capacity, and would comply with applicable statutes and regulations.

EXHIBIT B

FINDINGS FOR ALTERNATIVES TO THE PROPOSED PROJECT Santa Felicia Dam Safety Improvement Project SCH# 2017041005

Introduction

Before making a decision whether to approve a discretionary project under an environmental impact report (EIR), a lead agency must consider reasonable alternatives discussed in the EIR, or raised during the circulation and comments process, that could reduce environmental damage. The agency can either accept and proceed with one of the project alternatives, or reject the alternatives based on findings of failure to reduce environmental damage and/or infeasibility. Findings must be based on substantial evidence using comparative data, and the findings must reveal the agency's reasons for reaching its conclusions. [Village Laguna of Laguna Beach, Inc. v. Board of Supervisors (4th Dist. 1982) 134 Cal.App.3d 1022; Citizens of Goleta Valley v. Board of Supervisors (2d Dist. 1988) 197 Cal.App.3d 1167.]

When an agency properly rejects alternatives with findings of infeasibility, these findings may be made based on specific economic, legal, social, technological, or other considerations, including the provision of employment opportunities for highly trained workers. [Public Resources Code §21080(a); CEQA Guidelines §15091(a).]

The objectives of the project, as stated in the Final Environmental Impact Report (Final EIR) are an important reference point for evaluating the feasibility of alternatives. The CEQA Guidelines allow an alternative to be rejected as infeasible during the scoping process because it fails to meet most basic project objectives (Guidelines §15126.6(c)). However, that infeasibility may also be revealed through study in the EIR and input from the public review/circulation process. Section 1.3, Project Objective, Final EIR for the Santa Felicia Dam Safety Improvement Project states that the project is being pursued to improve the safety of Santa Felicia Dam. Improvements are required both to ensure that the outlet works can withstand loading from the Maximum Credible Earthquake and that the spillway can safely convey the outflow from the regulatory inflow design flood. In addition, intake improvements are needed to mitigate the accumulation of sediment in the reservoir which is projected to reach the inlet of the intake tower sometime between 2023 and 2025. If sediment accumulates to the crest of and/or above the inlet of the intake tower, then the District may lose the ability to control water releases from the dam.

The alternatives evaluated in the EIR include:

- *Alternative 1: Proposed Project*
- *Alternative 2: Labyrinth Alternative*
- *Alternative 3: No Project Alternative*

No alternatives were rejected during the scoping process; however, alternative project sites were eliminated from further consideration. Alternatives for the intake facility considered but eliminated from further analysis include a freestanding structure and inclusion of guard valves at intermediate locations within the tunnel. The former was eliminated as impractical as it would require costly underwater construction and significant excavation of sediment/alluvium to anchor into underlying bedrock. The latter was screened out and not considered further as it would not allow for dewatering of the conduit for inspection.

The screening criteria for the spillway modification alternatives included cost, implementation considerations, and the ability to accommodate the design objectives. This alternative included modification of the existing spillway and providing auxiliary spillway capacity. Modification of the existing spillway would involve construction a new extended ogee crest with a 660-foot crest length, raising one existing chute wall, replacing the opposite chute wall, and adding bridge spans or rebuilding the bridge. This alternative was not retained for further evaluation as it would be challenging to construction and would likely interfere with the outlet works improvements should they be located on the right abutment. Providing auxiliary spillway capacity would involve retaining the existing spillway and bridge, providing an auxiliary spillway with a 450-foot crest length over the existing dam by using conventional or roller-compacted concrete to protect the dam. This alternative was not retained for further evaluation as it would likely not be approved by the California Dam Department of Water Resources Division of Safety of Dams and the Federal Energy Regulatory Commission.

Alternative 1: Proposed Project

The Proposed Project is described in Section 3 of the Final EIR.

This alternative is hereby proposed for adoption for the following reasons:

A. Meets All Project Objectives. The basic objectives of the proposed project, including increasing dam safety.

B. Environmental Considerations. With implementation of Alternative 1, impacts related to construction-related noise and recreation would be significant and unavoidable.

Supporting evidence: Section 5 of the Final EIR analyzes the environmental impacts of Alternative 1 in detail.

Alternative 2: Labyrinth Alternative

Under this alternative, the existing spillway crest would be replaced with a labyrinth crest structure and the existing spillway chute would be widened and/or deepened to provide the required flood discharge capacity for the inflow design flood. This alternative would involve demolition of the existing service spillway crest structure, portions of the existing chute and spillway walls, and construction of a widened and/or deepened spillway with a six-cycle labyrinth crest structure as shown in Figures 4-1 through 4-6 of Section 4.3.2 of the Final EIR. The overall labyrinth width would be approximately 330 feet with a crest elevation at 1,055 feet above mean sea level. This configuration would route the inflow design flood with the reservoir reaching a maximum level at approximately 1,073.5 feet above mean sea level. The dam crest would remain at 1,075 feet above mean sea level (1,078 feet above mean sea level at the top of the existing parapet wall).

The labyrinth weir walls would be 16 feet high and the total length of wall for each labyrinth cycle would be approximately 368 feet. The width of the labyrinth crest normal to the flow direction would be 185 feet. The labyrinth structure itself has an estimated concrete volume of 11,000 cubic yards, excluding requirements for the chute modifications to provide the required discharge capacity. Construction requirements for the chute widening option and the chute deepening option would be similar to the requirements provided for the Project as described in Section 3 of the Final EIR, with the exception that the dam crest would not need to be raised and that it would involve significantly more demolition and concrete placement.

This alternative is hereby rejected for the following reasons:

A. Environmental Considerations. With implementation of Alternative 2, environmental impacts anticipated under Alternative 1 would still occur. Alternative 2 would involve more demolition and concrete placement, which would increase noise levels even further as significant unavoidable impacts.

Alternative 3: No Project Alternative

The No Project Alternative is hereby rejected for the following reasons:

A. Infeasible due to Failure to Meet Project Objectives. The basic objectives of the proposed project, to improve dam safety, would not be met. The spillway may not be able to safely convey the outflow from the regulatory inflow design flood, and the outlet works may not be able to withstand loading from the Maximum Credible Earthquake. In addition, intake improvements needed to mitigate the accumulation of sediment in the reservoir would not be made, making the existing intake tower inoperative sometime between 2023 and 2025. If sediment accumulates to the crest of and/or above the inlet of the intake tower, then UWCD may lose the ability to control water releases from the dam and manage releases from the outlet works.

EXHIBIT C

STATEMENT OF OVERRIDING CONSIDERATIONS

Santa Felicia Dam Safety Improvement Project SCH# 2017041005

Statement of Overriding Considerations

Overriding Considerations

The District hereby finds and determines that specific economic, legal, social, technological, or other considerations related to Alternative 1, the Proposed Project, outweigh the unavoidable adverse environmental effects identified in the Final EIR and discussed above, including any effects not mitigated because of the infeasibility of mitigation measures, and the adverse environmental effects are acceptable. This Statement of Overriding Considerations provides evidence to support findings that the adverse environmental effects from Alternative 1, the Proposed Project, which cannot feasibly be avoided or substantially lessened are acceptable.

1. Substantial Public Safety Benefits

The District has balanced the benefits of Alternative 1 against its unavoidable construction-related noise and recreation impacts. The District finds that the following consideration outweighs the unavoidable environmental impacts.

Alternative 1, the Proposed Project, will substantially benefit the District by helping to achieve the stated objective of improving dam safety by averting potential public safety impacts due to dam failure under seismic loading conditions and sedimentation near the existing intake tower. As a result of Alternative 1, the District is less likely to lose the ability to control water releases from the dam, which could be catastrophic.

Accordingly, the District finds that the Proposed Project's adverse, unavoidable environmental impacts are outweighed by the considerable public safety benefit the Proposed Project would provide.