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State Water Interconnection Project

Final Environmental Impact Report

State Clearinghouse Number 2018031010
City of Ventura Project PROJ-13707
City of Ventura EIR EIR-7-19-51055

July 25, 2019

Prepared for

City of San Buenaventura
Ventura Water
336 Sanjon Road
Ventura, CA 93001

Table of Contents

Section 1: Introduction to Final Environmental Impact Report

1.1 Introduction

The proposed project, the State Water Project (SWP) Interconnection, would enable delivery of SWP water by wheeling water through the Metropolitan Water District of Southern California (MWD) and Calleguas Municipal Water District (Calleguas) water systems to the City of Ventura. The pipeline facilities (the "interconnection") would also facilitate direct delivery of SWP water to United Water Conservation District (United) and direct or in-lieu[1] delivery of SWP water to Casitas Municipal Water District (Casitas). In addition, the interconnection would allow the City to deliver water to Calleguas during an outage of Calleguas' imported water supplies. The interconnection would be a pipeline used to transport water between Calleguas' and the City's distribution systems.

The pipeline would be approximately 7 miles in length originating in the easterly portion of the City of Ventura (Henderson Road between South Saticoy Avenue and South Wells Road) and traversing southerly and easterly through unincorporated Ventura County to the southwestern end of the City of Camarillo (near the intersection of Camino Tierra Santa and Via Zamora).

The City prepared and circulated a Notice of Preparation for the EIR on February 28, 2018. The City completed the Draft EIR for the SWP Interconnection Project and provided a Notice of Availability on February 19, 2019. The Draft EIR analyzes the environmental impacts to the following study areas: 1) Aesthetics, 2) Agriculture and Forestry Resources, 3) Air Quality and Greenhouse Gases 4) Biological Resources, 5) Cultural Resources, 6) Energy, 7) Geology and Soils, 8) Hazards and Hazardous Materials, 9) Hydrology and Water Quality, 10) Land Use Planning, 11) Mineral Resources, 12) Noise, 13) Population and Housing, 14) Public Services, 15) Recreation, 16) Transportation, 17) Tribal Cultural Resources, 18) Utilities and Service Systems, and 19) Wildfire. No resource impacts were found to be significant and unavoidable.

1.2 Contents of the Final EIR

The California Environmental Quality Act (CEQA) Guidelines Section 15132 states that the Final EIR shall consist of:

- The draft EIR or a revision of the draft
- Comments and recommendations received on the draft EIR either verbatim or in summary
- A list of persons, organizations, and public agencies commenting on the draft EIR

[1] *In-lieu* delivery means that the SWP would be delivered to a Ventura Water customer in the Casitas service area, rather than directly delivered to Casitas, and this would offset demand on the Casitas system.

- The responses of the Lead Agency to significant environmental points raised in the review and consultation process
- Any other information added by the Lead Agency.

In response to written comments received, changes have been made to the EIR. Additional information has been identified in written comments to the Draft EIR and responded to in Section 2, Responses to Comments, of this Final EIR. These changes, made since publication of the Draft EIR, do not substantially affect the analysis contained in the Draft EIR, do not result in a substantial increase in the severity of a significant impact identified in the Draft EIR, and do not change the conclusions in any way. All of the new information in Section 1.3 "Corrections and Additions to the Draft EIR," and in the comments and in the responses to comments merely clarify or amplify or make insignificant modifications to an adequate Draft EIR.

1.3 Corrections and Additions to the Draft EIR

Changes to the Draft EIR are identified below by the corresponding Draft EIR section and the page number. Additions are in underline and deletions are shown in ~~strikethrough~~ format.

Table of Contents, List of Tables

Page xiii, the following tables are added:

Table of Contents, List of Acronyms

Pages xv-xvi, the following acronyms are added:

Section 1.2 City of Ventura and Section 1.6 Need for the Proposed Project

In both Section 1.2 and Section 1.6 language has been removed. The removed language was based on an earlier misconception about the regulatory requirements for Ventura Water's potential potable reuse project (also referred to as the "VenturaWaterPure Project"). The City has since been advised that the VenturaWaterPure Project would not require a new source of water as a backup in case of emergency; any City water source could serve as a backup.

Page 1-6, the following text is removed:

> In order to continue to reliably meet the City's existing and future water demands, alternative supply sources are necessary. The City is currently preparing a draft EIR for the Ventura Water Supply Projects, which will examine several potential water supply projects at a programmatic level and a potential potable reuse project, known as the VenturaWaterPure Project, at the project level of review. The proposed State Water Interconnection Project is not anticipated to provide any increased water supply volume for the City and, thus, is not being considered in that EIR. However, the project would improve system reliability by providing access to a replacement supply source for the water supplies that have been reduced or otherwise become less available. ~~It also could meet a requirement for the proposed VenturaWaterPure Project, since the City may need to demonstrate an available backup supply in order to receive certain State approvals.~~ If Calleguas delivers imported water to the City as an emergency backup supply, the City would return an equivalent amount of water to Calleguas at a later time. Additionally, SWP water is a near-term option for providing the necessary water to dilute high TDS levels in groundwater to improve system water quality.

Page 1-8 the following text is removed:

> The City, Calleguas, United, and Casitas have the following needs:
>
> - The City needs to provide a continued reliable water service to City water customers. This involves making up for losses in annual yield from existing supply sources (Lake Casitas, Ventura River, and groundwater), improving water quality~~, and providing an emergency/backup connection for Ventura Water's potential potable reuse project~~.

Section 1.7 Project Objectives

Page 1-9, the following changes are made:

> The project would be designed to achieve the following objectives:
>
> - Provide a near-term water supply source for the City to enhance supply reliability;
> - Improve City water quality;
> - Provide a backup supply for the City's other potential, long-term water supply options;
> - Allow the City, Casitas and United to receive their SWP entitlements; and
> - Enable the City to deliver water to Calleguas during an imported water supply outage.

Project Components

Page 1-16, the following new section is added as Section 1.9.6.

1.9.6 Blended Water Quality

The proposed project would introduce SWP water to the City of Ventura system. Blending City of Ventura water would reduce some constituents that the City has had difficulty managing, specifically total dissolved solids (TDS). While City of Ventura water meets all applicable primary standards, City water has elevated TDS concentrations that exceed secondary standards (standards set for aesthetic, taste, and odor rather than protection of public health).

Calleguas has indicated that SWP water treated at MWD's Jensen Water Filtration Plant (WFP) would be the source of water to the Interconnection. Water quality for treated surface water produced by the Jensen WFP for the years 2013-2015 is summarized in Table 1-1a below.

Water from the Interconnection would enter the City's 430 Pressure Zone. After the Interconnection comes online, the two major water sources in the 430-pressure zone would be the groundwater treated at the Saticoy Water Conditioning Facility (WCF) and SWP water treated at the Jensen WFP. Table 1-1b summarizes the water quality at the Saticoy WCF from 2015-2016.

Because the exact amount of SWP water blended with City water would vary, a potential range of blending ratios was considered, as shown in Table 1-1c. As shown in Table 1-1c, blending City water with SWP water would improve TDS, lessen water hardness, and reduce sulfate in the resultant water.

Table 1-1a
Calleguas Water Quality and Drinking Water Standards

Constituent	Units	Drinking Water Standard	Jensen WFP [a]		
			Average	*Minimum*	*Maximum*
Aluminum	mg/L	1	ND	ND	0.084
Antimony	mg/L	0.006	ND	--	--
Arsenic	mg/L	0.01	0.003	--	--
Barium	mg/L	1	ND	--	--
Beryllium	mg/L	0.004	ND	--	--
Boron	mg/L	1	0.24	--	--
Cadmium	mg/L	0.005	ND	--	--
Chloride	mg/L	250-500-600	85	85	86
Chromium, Hexavalent	mg/L	0.01	ND	--	--
Chromium, Total	mg/L	0.05	ND	--	--
Conductivity	µS/cm	900-1600-2200	698	692	703
Copper	mg/L	1.3	ND	--	--
Cyanide	mg/L	0.15	ND	--	--
Fluoride	mg/L	2	0.9	0.7	1
Gross Alpha	pCi/L	15	3	ND	5
Gross Beta	pCi/L	20	ND	ND	5
Iron	mg/L	0.3	--	--	--
Lead	mg/L	0.015	ND	--	--
Manganese	mg/L	0.05	--	--	--
Mercury	mg/L	0.002	ND	--	--
Nickel	mg/L	0.1	--	--	--
Nitrate	mg/L as N	10	0.8	0.6	0.9
Nitrate + Nitrite	mg/L as N	10	--	--	--

Table 1-1a cont.

Constituent	Units	Drinking Water Standard	Jensen WTP [a]		
			Average	*Minimum*	*Maximum*
Perchlorate	mg/L	0.006	ND	--	--
Selenium	mg/L	0.05	ND	--	--
Silver	mg/L	0.1	ND	--	--
Sulfate	mg/L	250-500-600	110	108	112
Thallium	mg/L	0.002	ND	--	--
Total dissolved solids [b]	mg/L	500-1000-1500	405	405	
Turbidity	NTU	5	ND	--	--
Uranium	pCi/L	20	2	2	3
Zinc	mg/L	5	ND	--	--

"--" = No data available; mg/L = milligrams per liter, µS/cm = microsiemens per centimeter, NTU = nephelometric turbidity units

(a) Unless otherwise noted, data are from the Calleguas Municipal Water District Annual Water Quality Report July 2016, Summary of Water Quality Results for 2015, Jensen WFP.

(b) The Metropolitan Water District of Southern California General Mineral and Physical Analysis of Metropolitan's Water Supplies April 2013 through March 2014, Jensen WFP

Table 1-1b
Saticoy Water Conditioning Facility Treated Water Quality and Drinking Water Standards

Constituent	Units	Drinking Water Standard	Saticoy Water Conditioning Facility		
			Average	*Minimum*	*Maximum*
Aluminum [a]	mg/L	1	ND	ND	ND
Antimony	mg/L	0.006	--	--	--
Arsenic (a)	mg/L	0.01	0.00089	ND	0.0022
Barium (a)	mg/L	1	0.035	0.025	0.046
Beryllium	mg/L	0.004	--	--	--
Boron	mg/L	1	--	--	--
Cadmium	mg/L	0.005	--	--	--
Chloride (b)	mg/L	250-500-600	68	57	90
Chromium, Hexavalent	mg/L	0.01	--	--	--
Chromium, Total	mg/L	0.05	--	--	--
Color (b)	CU	15	5.42	4	10
Conductivity (b)	µS/cm	900-1600-2200	1619	1453	1737
Cyanide	mg/L	0.15	--	--	--
Fluoride (a)	mg/L	2	0.53	0.41	0.6

Table 1-1b cont.

Constituent	Units	Drinking Water Standard	Saticoy Water Conditioning Facility[b]		
			Average	*Minimum*	*Maximum*
Gross Alpha (a)	pCi/L	15	5.54	3.37	8.33
Gross Beta	pCi/L	20	--	--	--
Iron (b)	mg/L	0.3	<0.1	<0.1	<0.1
Manganese (b)	mg/L	0.05	<0.02	<0.02	<0.02
Mercury	mg/L	0.002	--	--	--
Nickel	mg/L	0.1	--	--	--
Nitrate (a)	mg/L as N	10	1.9	ND	4.4
Nitrate + Nitrite	mg/L as N	10	--	--	--
Odor (b)	TON	3	<1	<1	<1
Perchlorate	mg/L	0.006	--	--	--
Selenium (a)	mg/L	0.05	0.012	ND	0.026
Silver	mg/L	0.1	--	--	--
Sulfate (b)	mg/L	250-500-600	528	446	592
Thallium (a)	mg/L	0.002	0.0005	ND	0.0008
Total dissolved solids (b)	mg/L	500-1000-1500	1241	1065	1392
Turbidity (a)	NTU	5	0.24	0.1	0.52
Uranium (a)	pCi/L	20	3.21	2.79	4.28
Zinc	mg/L	5	--	--	--

"--" = data not available; mg/L = milligrams per liter, µS/cm = microsiemens per centimeter, NTU = nephelometric turbidity units, TON = threshold odor number, CU = color units, pCi/L = picocuries per liter

(a) Ventura's Water Quality Summary 2016 Summary of Water Quality Results for 2015, Groundwater. These data include water produced at the Saticoy and Bailey WCFs.

(b) Saticoy WCF Finished Water, 2015 to 2016.

Table 1-1c
Impact of Blending Ratio of Calleguas Water and Ventura Water

Constituent	Units	Target Values	Blend Ratio (%SWP)						
			0% (Ventura Only)	*10%*	*25%*	*50%*	*75%*	*90%*	*100% (Jensen WFP Water Only)*
Temperature	°C	--	20.0						20.0
pH (Median)	S.U.	--	7.34	7.36	7.40	7.48	7.65	7.91	8.29
Total Dissolved Solids	mg/L	500-1000-1500	1242	1147	1005	769	532	391	296
Calcium	mg/L	--	202	184	158	113	68	42	24
Total Hardness as $CaCO_3$	mg/L	--	707	--	--	--	--	--	112
Total Alkalinity (as $CaCO_3$)	mg/L	--	275	256	228	180	133	104	85
Chloride	mg/L	250-500-600	68	69	71	74	76	78	79
Sulfate	mg/L	250-500-600	528	480	409	289	170	98	50

Section 1.11

The following text is added as Section 1.11.2, page 1-25:

Good Construction Practices

All contractors will be required to adhere to the following "good practices" consistent with City policy:

- Construction vehicles transporting loose material (e.g., dirt, debris, trash) shall secure the materials to prevent littering. Before beginning construction in public roadways, the contractor shall provide notice to local transportation agencies about the schedule and location of construction.

Section 1.12.1

The following text modification is made to the beginning of this section, page 1-25:

1.12.1 ~~Annual~~ Water Deliveries

Annual Water Deliveries
Based on a hydraulic analysis performed, a 36-inch diameter pipeline could deliver as much as 18,800 AFY, if this volume of water was available. However, the availability of water is limited.

The following text modification is added to the end of this section, page 1-26:

Agreement for Water Deliveries
The City of Ventura and Calleguas would enter into an agreement formalizing the obligations of each party. Each party would commit to providing water to the other party or parties through the Interconnection when its flow and pressure conditions allow and its own customers are able to receive all of the water they need. There would be no guarantee of any particular flows under any circumstances, but if delivery capacity is available, each party would make its best efforts to provide water to the other as and when requested to do so.

Section 1.12.2

The following text modification is made to Section 1.12.2, page 1-26:

Flow from Calleguas to the City, and flow from the City to Calleguas, is expected to be by gravity. No pumping is required.

The City connection point is located along the existing 24-inch diameter pipeline on Henderson Road between South Saticoy Avenue and South Wells Road. This point of connection is part of the City's 430 foot hydraulic gradient pressure zone. When moving water from Calleguas to the City of Ventura, the turnout from Calleguas would be near Calleguas' Springville Reservoir and Hydroelectric Generating Station. To take advantage of the higher hydraulic grade line available and avoid the need for pumping, the turnout from Calleguas would be located upstream of the Springville Hydroelectric Generating Station on the 39-inch diameter Oxnard Santa Rosa 7 pipeline. A maximum hydraulic grade line of 650 feet is available before the Hydroelectric Generating Station for water flow to the City. Water conveyed from the City to Calleguas would enter Calleguas' system downstream of the Hydroelectric Generation Station at a hydraulic gradeline of approximately 289 feet.

Section 1.13, Table 1-6

Page 1-28, the following additions and modifications are made:

TABLE 1-6
POTENTIALLY REQUIRED PERMITS, APPROVALS, AND CONSULTATIONS

Agency	Permits/Approvals Potentially Needed to Implement the Project
City of Ventura	Building Permit (Blending Station)
City of Ventura	Design Review Application (as applicable to Blending Station)
City of Ventura Public Works	Encroachment Permit (Segment 2)
County of Ventura	Road Encroachment Permit (Segment 2)
City of Camarillo Department of Public Works	Encroachment Permit (Segments 18 and 19)
Caltrans	Caltrans Standard Encroachment Permit (Segment 18)
Caltrans	Caltrans Transportation Permit (for transportation of heavy construction equipment and/or materials which require the use of oversized-transportation vehicles on State Highways)
RWQCB	General National Pollutant Discharge Elimination System (NPDES) Permit for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties (General NPDES Permit No CAG994004)
SWRCB	NPDES General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities
US Army Corps of Engineers	Section 408 Permit (Permit to Modify or Alter US Army Corps of Engineers Civil Works Project)
~~Southern California Regional Rail Authority (SCRRA)~~ Ventura County Transportation Commission	Right-of-Way Encroachment Agreement (Segment 2)
VCWPD	Floodplain Development Permit
VCWPD	Encroachment Permit
VCWPD	Watercourse Permit (Segments 2, 10, 13, 16 and location of any dewatering discharge)

Section 2.3.1.1

Page 2-14 is amended as follows:

2.3.1.1 Climatological Setting

The proposed facilities would be located in the Oxnard Plain Airshed, a sub-basin of the South-Central Coast Air Basin (SCCAB). The Airshed is characterized by cool winters and warm, dry summers tempered by cooling sea breezes. Summer, spring, and fall weather is generally a result of the movement and intensity of the semi-permanent high-pressure area located several hundred miles to the west. Marine influences typically predominate during this period and cause afternoon onshore flow

and evening off-shore flow. Winter weather is usually a result of the size and location of low pressure weather systems originating in the north Pacific Ocean.

At the Oxnard Airport (6.3 miles to the south of the Ventura connection point), the maximum average monthly temperature is 73 ~~72.4~~ degrees Fahrenheit (°F) in August, and the minimum average monthly temperature is 46 ~~45.2~~°F in December and January. The average monthly maximum precipitation is 3.77 ~~2.68~~ inches in February, and the average monthly minimum is 0.05~~1~~ inches in August, with an average annual precipitation of ~~10.39~~ 15.9 inches (~~1998-2008~~ 1981-2010 averages). At the Oxnard Airport, the average monthly wind speed varies from 2.6 mph in August to 4.5 mph in December. However, winter storms may bring short periods of much higher wind speeds. The typical wind direction is from the northwest and west. Onshore wind flow is prevalent, with a marine cloud layer causing heavy fog (visibility one-quarter mile or less) an average of 29.4 days per year.

Section 2.13.3.2 Project-Specific Impacts and Section 3.2.3 Population Growth

In both Section 2.13.3.2 and Section 3.2.3 language has been removed. The removed language was based on an earlier misconception about the regulatory requirements for Ventura Water's potential potable reuse project (also referred to as the "VenturaWaterPure Project"). The City has since been advised that the VenturaWaterPure Project would not require a new source of water as a backup in case of emergency; any City water source could serve as a backup.

Page 2-122 is amended as follows:

Population Growth Impacts (Significance Threshold a - d)

The proposed project does not consist of housing or businesses that would have the potential to directly induce substantial planned or unplanned population growth.

The proposed project would provide the infrastructure to enable delivery of SWP water that has been wheeled through the MWD and Calleguas water systems to the City of Ventura. The proposed interconnection would also facilitate direct delivery of SWP water to United and in-lieu delivery of SWP water to Casitas. Water supplies can, in some cases, be an impediment to population growth if insufficient supplies are expected to be available to support that growth. Conversely, an abundance of water supplies and/or the ability to augment existing supplies with new water sources may help sustain and potentially promote growth. However, the water supply to be provided by the project would replace lost supplies and act as an outage supply as follows:

- The City needs to provide a continued reliable water service to City water customers. This involves making up for losses in annual yield from existing supply sources (Lake Casitas, Ventura River, and groundwater)~~,~~ and improving water quality~~, and providing an emergency/backup connection for Ventura Water's potential potable reuse project~~. If Calleguas provides water to Ventura during an emergency, Ventura would provide a like quantity of water back to Ventura after the emergency is over.

Page 3-3 is amended as follows:

3.2.3 Population Growth

The proposed project would provide the infrastructure to enable delivery of SWP water that has been wheeled through the MWD and Calleguas water systems to the City. The proposed interconnection would also facilitate direct delivery of SWP water to United and in-lieu delivery of SWP water to Casitas. Water supplies can, in some cases, be an impediment to population growth if insufficient supplies are expected to be available to support that growth. Conversely, an abundance of water supplies and/or the ability to augment existing supplies with new water sources may help sustain and potentially promote growth. However, the water supply to be provided by the project would replace lost supplies and act as an outage supply as follows:

- The City needs to provide a continued reliable water service to City water customers. This involves making up for losses in annual yield from existing supply sources (Lake Casitas, Ventura River, and groundwater)~~,~~ and improving water quality~~, and providing an emergency/backup connection for Ventura Water's potential potable reuse project~~. If Calleguas provides water to Ventura during an emergency, Ventura would provide a like quantity of water back to Ventura after the emergency is over.

Section 2: Response to Comments

Section 15087 of the State CEQA Guidelines provides an opportunity for the public and agencies to review the Draft EIR and submit comments regarding the adequacy of the analysis of the potential environmental impacts of the proposed project. In accordance with the requirements of Section 15088 of the CEQA Guidelines, responses to these comments and any necessary revisions or clarifications to the EIR analysis are included in a Final EIR.

The letters that follow are the public comment letters on the Draft EIR for the proposed SWP Interconnection project. The Draft EIR was circulated for a public review period that began on February 19, 2019 and concluded on April 5, 2019. This section includes responses to comments on the Draft EIR.

The City received 26 comment letters on the Draft EIR. Commenters and the pages on which each letter appears are listed below.

No.	Commenter	Date	Page
24	Kathy Bremer	4/2/19	2-73
25	Diane Underhill	4/5/19	2-76
26	Ventura River Water District	4/23/19	2-91

Lauren Everett

Subject: FW: Comments on SWP Draft EIR

From: Scott McCarty [mailto:scott.mccarty@alumni.stanford.edu]
Sent: Thursday, February 28, 2019 5:47 PM
To: Cooper, Betsy
Cc: hubnerg@aol.com
Subject: Comments on SWP Draft EIR

Hi, Betsy,

Thanks for your presentation on the SWP Draft EIR to the Water Commission and members of the public on Tuesday night. I only have a few comments/questions that you might deem pertinent to be addressed in the final version of the EIR:

1. Some acronyms to add to the List of Acronyms: ATE, CEQA, CGP, NAHC, and RWQCB. — 1A
2. Section 1.12.2 Pumping Requirements, page 1-26, states that water flow from Calleguas to the City, and vice versa, is expected to be by gravity. It would be nice for a layman reading this document to have a short explanation of how water can move both ways via gravity, without pumping. — 1B
3. Section 2.5.4 Mitigation Measures, CR MM-8, page 2-70 discusses the possibility of project redesign prior to the issuance of construction Notice to Proceed. My concern here is that Segment 18, which was determined to have potential project-specific cultural resources impacts, appears also to the most constrained section of the entire project. The question that comes to my mind is, In the case of need for project redesign due to mitigation of cultural impacts, will the higher-risk segments of this project be evaluated for Notice to Proceed before lower-risk segments? Specifically, project redesign is considered a less-than-significant impact per Section 2.5.5. However, that conclusion is not inherently obvious to this reader for Section 18, which appears to be very tightly constrained. Redesign of this particular section may indeed have significant ripple effects for adjoining sections (and budget and timeline). — 1C

Thanks, Betsy.

Cheers,
Scott McCarty
Water Commission Member

Letter 1

COMMENTER: Scott McCarty, Ventura Water Commission

DATE: February 28, 2019

RESPONSE:

Response 1A

The requested acronyms have been added, see Section 1.3 of the Final EIR.

Response 1B

Additional explanation of how gravity flow is used by the project has been added, see Section 1.3 of the Final EIR.

Response 1C

The Mitigation Measure in question is CR MM-8, which states that: Prior to the issuance of the construction Notice to Proceed, Phase II subsurface testing and evaluation shall be performed for the portion of CA-VEN-223 to be impacted by Segment 18. The Phase II testing will consist of a combination of Test Excavation Units (TEUs) and Shovel Test Probes (STPs) and will determine the vertical and horizontal extent and composition of prehistoric deposits within Segment 18. A qualified archaeologist shall oversee the Phase II testing and a Native American representative shall monitor all excavation.

a. If the portion of CA-VEN-223 within Segment 18 is determined to be significant after Phase II testing, project redesign or Phase III Data Recovery mitigation will be performed.
b. If the portion of CA-VEN-223 within Segment 18 is determined not to be significant after Phase II testing, the project may proceed as planned with a qualified archaeologist and Native American representative monitoring all ground disturbance.

The project redesign envisioned in CR MM-8 is to shift the pipeline location or construction corridor within the area already evaluated as part of the EIR. If redesign is not feasible, prior to construction Phase III Data Recovery will take place.

Lauren Everett

Subject: FW: SWP EIR- Water quality data

-----Original Message-----
From: Duane Georgeson [mailto:duanegeorgeson@msn.com]
Sent: Monday, March 04, 2019 10:47 AM
To: Cooper, Betsy
Subject: SWP EIR- Water quality data

During last Tuesday's hearing on the EIR it was pointed out that there is no water quality Data in the draft EIR and the response was that that information would be added in a short supplement to the draft.
Is that water quality information available yet?
Many thanks,
Duane Georgeson
Sent from my iPhone

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Letter 2

COMMENTER: Duane Georgeson

DATE: March 4, 2019

RESPONSE:

Response to Letter 2

Water quality information has been added to the EIR; see Section 1.3 of the Final EIR.

06 March 2019

From: Daniel Cormode
186 Gorrion Ave
Ventura, CA 93004

To: City of Ventura, Ventura Water
Betsy Cooper
501 Poli Street
Ventura, CA 93002-0099
bcooper@cityofventura.ca.gov

Subj: State Water interconnection Project (SCH No. 2018031010) Draft Environmental Impact Report Review Comments

1. The City of San Buenaventura has prepared a Notice of Availability to notify responsible and trustee agencies that an Environmental impact Report (EIR) for implementation of the State Water Interconnection Project (SWP) has been prepared and forwarded for review and comment.
2. The EIR is stated to be an "informational document based on facts"[1].
3. The project would enable delivery of State Water Project (SWP) water by wheeling water through the Metropolitan Water District of Southern California (MWD) and Calleguas Municipal Water District (Calleguas) water systems to the City of Ventura. The pipeline facilities (the "interconnection") would also facilitate direct delivery of SWP water to the United Water Conservation District (United) and direct or in-lieu delivery[2] of SWP to Casitas Municipal Water District (Casitas). In addition the interconnection would allow the City to deliver water to Calleguas during an outage of Calleguas imported water supplies. The interconnection would be a pipeline used to transport water between Calleguas and the City's distribution systems.
4. The pipeline would be approximately 7 miles in length or originating in the easterly portion of the City of Ventura and traversing southerly and easterly through unincorporated Ventura County to the southwestern part of the City of Camarillo.
5. The objective of the State Water Interconnection Project (SWP) is stated to: Provide a water supply source to the City to enhance supply reliability; Improve water quality; Allow Casitas and United to receive their State Water Project entitlement; and, Enable the City to deliver water to Calleguas during an imported water supply outage.[3]
6. A summary and description of the various capital improvement projects which are required as a prerequisite to implementing the capability to receive and distribute State Water in the City of

3A

[1] Handout, Ventura Water State Water Interconnection Project, Public Meeting Review Draft Environmental Impact Report, Slide 3, February 26, 2019
[2] In-lieu delivery means that all the SWP would be delivered to a Ventura Water customer in the Casitas service area, rather than directly delivered to Casitas, and this would offset demand on the Casitas system. Notice of Availability, February 19, 2019.
[3] Handout, Ventura Water State Water Interconnection Project, Public Meeting Review Draft Environmental Impact Report, Slide 6, February 26, 2019

File: State Water Project EIR Comments 2019 03 06.docx

San Buenaventura are provided as supporting information in Table 1 - State Water Capital Improvement Plan Description and Costs below.

Table 1
State Water Project Capital Improvement Plan Description and Costs

Project No.	Project Description	CIP Description and Comment	FY2018-2024 CIP Cost Estimate
97949	Waterline – State Water Project Interconnection	The proposed pipeline and facilities will provide a means of conveying water between Ventura and Calleguas Municipal Water DIstrict. Not a source of new water. Proposed project is for construction of pipeline only and does not include necessary distribution pipeline projects	$22,900,000
97955*	Waterline – Midtown to Westside	Project consists of transmission pipelines to transport groundwater from the 330 pressure zone to the 201 pressure zone on the west side of town. This project is necessary to meet water quality goals, provide additional water to the west side of the City for drought and peak demand periods and to improve fireflow availability. Completion: FY2020-2021	$13,400,000
97956*	Waterline – Eastside to Midtown	This project is the 2nd phase of constructing transmission pipelines to provide physical means to transport groundwater from the east end of the City to the midtown area. The work is necessary to meet water quality goals, provide additional water to the westside of the City for drought and peak demand periods and to improve fireflow availability. Completion FY 2021-2022.	$5,700,000
73102*	Treatment – State Water Blending Station	This project is to acquire land and determine location for a chloramine monitoring and booster station. Once the land is acquired, the facility will be designed and constructed. Completion FY2021-2022.	$3,990,000
73092*	Waterline Replacement – Main St./Telephone Rd.	Description: This project helps to move water west to east and vice versa during drought or supply deficit conditions: Completion FY 2021-2022.	$8,900,000
73111*	Pump Station 210/260 Boundary Adjustment	Preliminary investigation of this improvement has shown that several hundred feet of piping may be required to adjust the zone boundary and pressure redundancy in the 210 and proposed 260 pressure zone areas. In the event that Ventura River and the Casitas Turnouts do not supply water to the City, low pressure areas in the 210 zone are expected to worsen. Completion 2019-2020.	$1,500,000
73061*	Water Treatment – Saticoy Facility Upgrade	Upgrades to the conditioning facility and increase capacity from 3.2 MDG to 7MGD. Provides backup, redundancy and drought-proof capabilities in the water	$14,000,000

3A

File: State Water Project EIR Comments 2019 03 06.docx

Table 1 State Water Project Capital Improvement Plan Description and Costs			
Project No.	Project Description	CIP Description and Comment	FY2018-2024 CIP Cost Estimate
		system. Completion FY2022-2023.	
	Total		$70,390,000

3A

- Valuation of CIP Project not included in State Water Interconnection Pipeline EIR.

7. The following comments are provided regarding the adequacy and completeness of the subject EIR:
    a. The EIR is incomplete. The impact to the environment of the various capital improvement projects identified in Table 1 above which are required as a prerequisite to implementing the capability to receive and distribute State Water in the City of San Buenaventura from the interconnection pipeline are not identified or evaluated. During the public comment portion of the Ventura Water Commission hearing on the State Water Interconnection Project Draft Environmental Impact Report (EIR), an observation was made that the EIR for the proposed State Water Interconnection Project appeared to be incomplete since it only addressed construction of the pipeline and did not include associated additional water distribution system modifications required to transmit water from the Saticoy facility to west Ventura customers. Ventura Water staff's response was "Ventura Water currently has the capability to deliver water from east Ventura to west Ventura," therefore, proposed waterline and pump station improvements are not required as a prerequisite for delivering State Water from the Saticoy facility to west Ventura. If Ventura Water staff's response is correct, then what is the justification for the six unnecessary CIP projects totaling $47,490,000?

3B

    b. No factual or supporting data is provided to support the conclusion that reliability of the water supply will be enhanced.

3C

    c. No factual or supporting data is provided to support the conclusion that water quality will be enhanced.

3D

8. For additional information, please contact Daniel Cormode by telephone at 805-647-4063 or be email at dcormode@sbcglobal.net.

File: State Water Project EIR Comments 2019 03 06.docx

Letter 3

COMMENTER: Daniel Cormode

DATE: March 6, 2019

RESPONSE:

Response 3A
This appears to be general background information and not a specific comment on the Draft EIR. No response needed.

Response 3B

The projects covered in this EIR, and included in the Capital Improvement Plan, are the State Water Project Interconnection and State Water Blending Station. The other capital projects listed by the commenter are as follows:

- Waterline – Midtown to Westside
- Waterline – Eastside to Midtown
- Waterline Replacement – Main Street/Telephone Road
- Pump Station 210/260 Boundary Adjustment
- Water Treatment – Saticoy Facility Upgrade

These projects are independent of the SWP Interconnection and would go forward with or without the proposed project. The above listed projects are meant to correct existing and projected system deficiencies and were in the City's Capital Improvement Plan prior to the SWP Interconnection Project.

Response 3C

The proposed project adds a supplemental supply source to the City of Ventura portfolio – which inherently increases supply reliability. Most importantly, the proposed project adds a new type of supply, a regional, rather than just local, supply source. The reliability of the SWP supply is described in the Draft EIR (Section 1.12.1). As discussed in that section, over the long-term, the SWP is anticipated to deliver 62% of each contractor's Table A amount, but, in a very dry year or in the event of infrastructure failure, the SWP may deliver no water. However, a drought in the Ventura area does not necessarily mean a drought for the SWP. From 2012 to 2018, the City of Ventura was considered to be in drought (based on the USDA Drought Monitor (https://droughtmonitor.unl.edu/Maps/MapArchive.aspx). In 2017, the area supplying the SWP was not considered to be in drought and delivered 85 percent of Table A allocations.

Response 3D

Water quality information has been added to the EIR, see Section 1.3 of the Final EIR. This additional information documents the enhanced water quality anticipated from the proposed project.

United States Department of the Interior
U.S. FISH AND WILDLIFE SERVICE
Ecological Services
Ventura Fish and Wildlife Office
2493 Portola Road, Suite B
Ventura, California 93003

IN REPLY REFER TO:
08EVEN00-2019-CPA-0046

March 12, 2019

Betsy Cooper
City of Ventura, Ventura Water
City of Ventura
501 Poli Street
Ventura, California 93002-0099

Subject: Comments on the Draft Environmental Impact Report for the Ventura State Water Interconnection Project (SCH No. 2018031010), Ventura, California

Dear Ms. Cooper:

We have reviewed the Draft Environmental Impact Report (DEIR) for the City of San Buenaventura (City of Ventura) State Water Interconnection Project, released by your office on February 19, 2019, and received in our office on February 21, 2019. The proposed project would construct a water connection pipeline approximately 7 miles in length between the eastern portion of the City of Ventura and the southwestern edge of the City of Camarillo. The proposed project would enable delivery of State Water Project (SWP) water from the Metropolitan Water District of Southern California (MWD) and through the Calleguas Municipal Water District (Calleguas) to water districts that serve the City of Ventura and adjacent portions of the County of Ventura. The pipeline interconnection would also facilitate direct delivery of SWP water to the United Water Conservation District and the Casitas Municipal Water District.

The U.S. Fish and Wildlife Service's (Service) mission is to conserve and protect the Nation's fish and wildlife resources and their habitats. To assist in meeting this mandate, the Service provides comments on public notices issued for projects that may have an effect on those resources, especially federally listed plants and wildlife. The Service's responsibilities also include administering the Endangered Species Act of 1973, as amended (Act). Section 9 of the Act prohibits the taking of any federally listed endangered or threatened wildlife species. "Take" is defined at Section 3(19) of the Act to mean "to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct." The Act provides for civil and criminal penalties for the unlawful taking of listed wildlife species. Such taking may be authorized by the Service in two ways: through interagency consultation for projects with Federal involvement pursuant to section 7 or through the issuance of an incidental take permit under section 10(a)(1)(B) of the Act.

Our review of the DEIR indicates that the City of Ventura intends the additional SWP water (from MWD) to primarily replace lost water supplies for the Ventura water districts due to the recent drought conditions, but it also states "…the project has the ability to augment existing supplies with new water sources…." While the City of Ventura does not intend for the additional water to be growth inducing, there is no mechanism discussed in the DEIR to preclude potential growth inducing aspects of the proposed project. Therefore, we recommend that the final EIR address this issue in more depth and any potential effects to sensitive species and their habitats.

4A

Our review of the proposed project, specifically the interconnection pipeline construction, indicates that area is known to support the following listed species:

Common Name	Scientific Name	Threatened or Endangered
Least Bell's vireo	*Vireo pusillus bellii*	Endangered

We recommend that focused surveys for this species be conducted in the appropriate season and that follow acceptable protocols. If this species is detected or is known to be present in the project area, you should contact us to help determine what measures may be appropriate to conserve the species and its habitats. We can also provide guidance on the steps that may be needed to comply with the Act.

4B

If you have any questions, please contact Mark A. Elvin of my staff at (805) 677-3317, or by e-mail at mark_elvin@fws.gov.

Sincerely,

Stephen P. Henry
Field Supervisor

Letter 4

COMMENTER: Stephen P. Henry, US Fish and Wildlife Service

DATE: March 12, 2019

RESPONSE:

Response 4A

As described in Section 1.2 and Section 1.6, the proposed project would make up for losses in annual yield from Lake Casitas, the Ventura River, and groundwater. The SWP, a regional water supply source, would compensate for these lost local supplies but would not result in the City having a greater annual volume of supply than it has historically had. Because the proposed project is making up for local supplies, it is not growth inducing; because the proposed project provides a different, regional, supply, it enhances water supply reliability.

The purpose of the proposed project is to make it possible to:

- Deliver SWP water to the City of Ventura to offset losses in existing water supplies.
- Make in-lieu deliveries to Casitas to offset losses in existing water supplies.
- Provide the infrastructure so that United can take direct delivery of its SWP water to offset decreases in groundwater replenishment and provide an emergency connection for the O-H system.
- Provide water supplies to Calleguas during an outage of imported water.

The project would not create a new water demand, nor provide capacity to meet projected future water demands. As stated in CEQA Guidelines Section 15126.2(d), "indirect" growth inducement can include "reducing obstacles to population growth," such as water supply. Growth inducement may result in adverse impacts if the growth is not consistent with local land use plans and growth management plans and policies for the area; this "disorderly" growth could indirectly result in additional adverse environmental impacts. The City's adopted General Plan guides the type, location, and level of land use and development planned for the City. The environmental impacts of this growth were addressed in the City of Ventura 2005 General Plan Final Environmental Impact Report (General Plan Final EIR). Because the proposed project will not promote growth beyond the growth permitted by the General Plan and evaluated by the General Plan Final EIR, the proposed project is not growth-inducing.

Response 4B

The Draft EIR recognizes the potential for the endangered least Bell's vireo to occur along the proposed interconnection pipeline alignment. The project has been designed to avoid suitable habitat by installing the pipeline under the Santa Clara River using directional drilling methods. In addition, mitigation measures (BIO MM-1) have been provided to require pipeline installation within 500 feet of suitable habitat to be conducted during the non-breeding season. This 500-foot buffer is based on informal consultation with USFWS on other projects along the Santa Clara River in the project area. The City has assumed the species may be present, such that protocol surveys are not needed.

Lauren Everett

Subject: FW: State Water Interconnection Project (SCH No. 2018031010) Draft Environmental Impact Report Review Comments

From: "Daniel Cormode" <dcormode@sbcglobal.net>
Date: March 14, 2019 at 11:01:18 AM PDT
To: <bcooper@cityofventura.ca.gov>
Cc: <citymanager@cityofventura.ca.gov>, <council@cityofventura.ca.gov>, <watercommission@cityofventura.ca.gov>
Subject: State Water Interconnection Project (SCH No. 2018031010) Draft Environmental Impact Report Review Comments

06 March 2019

From: Daniel Cormode
186 Gorrion Ave
Ventura, CA 93004

To: City of Ventura, Ventura Water
Betsy Cooper
501 Poli Street
Ventura, CA 93002-0099
bcooper@cityofventura.ca.gov

Subj: State Water interconnection Project (SCH No. 2018031010) Draft Environmental Impact Report Review Comments

1. The following are additional review comments relative to the subject EIR are provided for information and action as deemed appropriate.

2. The subject EIR fails to comply with Section 15131 of the Guidelines for Implementation of the California Environmental Quality Act Article 9 Contents of Environmental Impact Reports by not addressing the social and economic impact of adopting or not adopting the $150M proposed project.
    a. What is the expected impact of the project on water quality and availability on the quality of life of residents residing in the project areas?
    b. What is the effect of the project on capital costs and commodity costs?
    c. What is the expected economic impact of the project options on water rates and property taxes, especially to minority populations, economically disadvantaged persons or elderly persons on fixed incomes.?

5A

3. The City Council has established that "there is a direct nexus between the availability of water supply and the immediate preservation of the public health and safety"; and, resolved that " the ordinary demands and requirements of the water consumers served by the City of San Buenaventura cannot be met by the water supplies now available to the City without depleting the water supply or diminishing its quality to the extent that there would be insufficient water for human consumption".[1]

5B

1

4. California Environmental Impact Reports (EIR) shall include social and economic information.

   a. Environmental Impact Reports shall contain the information outlined in this article.[2]

   b. Draft EIRs shall contain the information required by Sections 15122 through 15131. Final EIRs shall contain the same information and the subjects described in Section 15132.[3]

   c. Description of the project shall contain the following information but should not supply extensive detail beyond that needed for evaluation and review of this environmental impact.[4]

   d. A general description of the project's technical, economic, and environmental characteristics considering the principal engineering proposals if any and supporting public service facilities.[5]

   e. Economic or social effects of a project may be used to determine the significance of physical changes caused by the project.[6]

   f. Economic, social, and particularly housing factors shall be considered by public agencies together with technological and environmental factors in deciding whether changes in a project are feasible to reduce or avoid significant effects on the environment.[7]

5C

5. For additional information, please contact Daniel Cormode by telephone at (805)647-4063 or by email at dcormode@sbcglobal.net.

[1] San Buenaventura City Council Resolution No. 2014-057 dated 09/22/2014
[2] Title 14. California Code of Regulations, Chapter 3 Guidelines for Implementation of the California Environmental Quality Act, Article 9 Contents of Environmental Impact Reports. Section 15120(a).
[3] Title 14. California Code of Regulations, Chapter 3 Guidelines for Implementation of the California Environmental Quality Act, Article 9 Contents of Environmental Impact Reports. Section 15120(c).
[4] Title 14. California Code of Regulations, Chapter 3 Guidelines for Implementation of the California Environmental Quality Act, Article 9 Contents of Environmental Impact Reports. Section 15124.
[5] Title 14. California Code of Regulations, Chapter 3 Guidelines for Implementation of the California Environmental Quality Act, Article 9 Contents of Environmental Impact Reports. Section 15124(c).
[6] Title 14. California Code of Regulations, Chapter 3 Guidelines for Implementation of the California Environmental Quality Act, Article 9 Contents of Environmental Impact Reports. Section 15131(b).
[7] Title 14. California Code of Regulations, Chapter 3 Guidelines for Implementation of the California Environmental Quality Act, Article 9 Contents of Environmental Impact Reports. Section 15131(c).

Letter 5

COMMENTER: Daniel Cormode

DATE: March 14, 2019

RESPONSE:

Response 5A

When social or economic effects would have physical impacts on the environment, CEQA requires analysis of the physical impacts. The Draft EIR addresses all anticipated physical impacts on the environment. Therefore, the Draft EIR complies with Section 15131(a), which states:

> Economic or social effects of a project shall not be treated as significant effects on the environment. An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes. The intermediate economic or social changes need not be analyzed in any detail greater than necessary to trace the chain of cause and effect. The focus of the analysis shall be on physical changes.

Commenter did not provide linkage between project cost and a physical change in the environment.

A discussion on potential water quality impacts/improvements has been added in Section 1.3 of this Final EIR.

Response 5B

This comment points to one of the proposed project objectives, to provide a near-term water supply source for the City to enhance supply reliability. No response needed.

Response 5C

See Response 5A.

Lauren Everett

From: Cooper, Betsy <bcooper@cityofventura.ca.gov>
Sent: Thursday, March 21, 2019 11:50 AM
To: Meredith Clement; Lauren Everett
Subject: FW: Online Form Submittal: State Water Interconnection

Below is a comment submitted through the City's public website.

Thanks, Betsy

From: noreply@cityofventura.ca.gov [mailto:noreply@cityofventura.ca.gov]
Sent: Wednesday, March 20, 2019 2:55 PM
To: Noeng, Monica; Cooper, Betsy
Subject: Online Form Submittal: State Water Interconnection

State Water Interconnection

First Name	George
Last Name	Naugles
Email Address	NauglesRCE@gmail.com
Share your comments on the State Water Interconnection Project	Currently our east end water fluctuates in Quality parameters of ammonia residuals which are extremely unpleasant, and total dissolved solids which are also unpleasant but less so. Can the City please stop over-injecting ammonia into our drinking water and also keep our TDS levels lower? Sometimes I also see significant alum precipitate out of our drinking water, suggesting incomplete treatment prior to delivery. If State water is added, can the City please make sure it is free of pesticides before it is delivered to us, possibly banking the State water in a long term storage for that water which allows for removal and bioremediation of such low concentration toxics? For example air-stripping,followed by contaminant sorption and precipitation and sludge removal may help...followed by infiltration or well-injection to maintain a greater margin of emergency water supply.

6A

Email not displaying correctly? View it in your browser.

1

Letter 6

COMMENTER: George Naugles

DATE: March 21, 2019

RESPONSE:

Response 6A

Under the proposed project, SWP water to be received by the City of Ventura would have previously undergone treatment to potable standards at the Jensen Water Filtration Plant. A discussion on potential water quality impacts/improvements has been added in Section 1.3 of this Final EIR.

City staff note the commenter's remarks regarding existing City water quality and operations and will share them with appropriate staff.

Comments on City of Ventura's State Water Interconnection Project (Project) Environmental Impact Report (Report), dated February 2019.

Submitted by Gerhardt Hubner

1. General Comment: Overall the Report is clear, concise, and understandable. The addition of an Executive Summary to the Report would be helpful. 7A

2. Section No. 1, Project Description: This Project would also facilitate the City of Ventura's receipt of its SWP entitlements, as the City has no current means of having its SWP entitlement delivered. Recommend that the above objective be added globally throughout the Report whenever the Project is described. 7B

3. Section 1.7 Project Objectives: Under the fourth bullet for the list of agencies recommend this addition to the bullet: "Allow the City of Ventura, Casitas and United to received their SWP entitlements.

4. Section 1.9.3. The description of Segment 2, the pipeline under the Santa Clara River is a bit incomplete. Horizontal directional drilling is listed as the technology, and Table 1-2 one column describes depth for Segment 2 as "minimal". However, there is no description defining "minimal". For example, how deep will the pipeline be placed below the Santa Clara River? How will the pipeline segment be anchored and secured? How will the pipeline be protected from scouring from certain flood events (10, 20, 50- and 100-year flood events)? A more complete description in the Report for this important component of the Project would be helpful. 7C

5. Section 1.11.1 - Construction Schedule: As stated: "Construction is assumed to last approximately 30 months.." As a general comment, this seems lengthy for this type of Project. Perhaps construction can be initiated simultaneous on multiple pipeline segments to reduce this timeframe. 7D

6. Section 1.3 Purpose and Intended Use of the EIR, Table 1-6, Potentially Required Permits, Approvals, and Consultations Permits.
   a. I understand that Local Agency Formation Commission approval may be required for the Project, yet it is not one of the agencies listed on Table 1-6. If required, the process for this approval should be described in the Report, and any implications to the Project and schedule.
   b. Permits and/or consultations may be needed for pipeline Segment 2 (crossing the Santa Clara River). No mention is made for any permits or consultation needed with State or Federal regulatory or resource agencies. For example, will RWQCB 401 Certification, Army Corps of Engineer or Fish and Game permits be needed for Segment 2 of the Project? 7E

Letter 7

COMMENTER: Gerhardt Hubner, Ventura Water Commission

DATE: March 22, 2019

RESPONSE:

Response 7A

Thank you for your comment.

Response 7B

The EIR has been modified to clarify that one of the project objectives is to deliver the City of Ventura's SWP entitlements. See Section 1.3 of this Final EIR.

Response 7C

The "minimal" depth for Segment 2 referred to by the commenter is for the bore pit. As noted in the footnote to Table 1-2 "minimal" is a bore pit of less than 20 feet.

As part of final design, geotechnical analysis and scour analysis will be performed in support of the crossing of the Santa Clara River. These studies will determine the final depth needed to protect the pipeline from potential scour of the river. The material overlying the pipeline will act to secure and anchor the pipeline. Commenter is referred to Section 2.7.4 Geology Mitigation Measure 1 (GEO MM-1).

Response 7D

It has been assumed for the analysis that up to three open cut segments and two trenchless segments would be under construction at any time. This level of construction intensity is intended to avoid significant traffic impacts.

Response 7E

The City of Ventura does not anticipate that LAFCO approval would be required.

While preparing the Draft EIR, the City of Ventura contacted the various trustee agencies including the Army Corps of Engineers, California Department of Fish and Wildlife, and U.S. Fish and Wildlife Service. Contact with those agencies indicated that, because HDD would not result in equipment in the river, result in dredge materials being released into the river, divert or obstruct the natural flow, change the bed, channel, or bank, or result in other modification to the river, permits from the California Department of Fish and Wildlife and Regional Water Quality Control Board are not required for the proposed project. These agencies, the California Department of Fish and Wildlife, and U.S. Fish and Wildlife Service were also contacted as part of the CEQA Notice or Preparation and Notice of Availability. An Army Corps of Engineers Section 408 Permit has been added to Table 1-6 (see Section 1.3 of this Final EIR).

Comments to DRAFT EIR regarding State Water Interconnection Project

Suzanne McCombs March 25, 2019

1. Section 1.3: Who determines what "fair compensation" is with respect to the charges assessed by Calleguas for wheeling water? — 8A
2. Section 1.11.1, based upon a projected construction schedule of 30 months, what is the anticipated start date for construction? Anticipated completion date? Seems like we aren't going to actually connect and be able to receive water until 2022 best case. Is it possible to work from both ends to speed up completion? — 8B
3. What are anticipated costs if EIR approved in current form and mitigation measures are implemented? In other words, how do proposed mitigation measures compare to what was included in conceptual plans from a cost standpoint? — 8C
4. Section 2.4.4: Mitigation required (BIO MM- 1 and BIO MM- 2) in particular seem to be very restrictive and could significantly delay construction. — 8D
5. Section 2.16.4: TR MM- 1, how significant will delay in construction be to accommodate this mitigation recommendation? — 8D

Letter 8

COMMENTER: Suzanne McCombs, Ventura Water Commission

DATE: March 25, 2019

RESPONSE:

Response 8A

Water Code Section 1811, subdivision (c) defines "fair compensation" as "the reasonable charges incurred by the owner of the conveyance system, including capital, operation, maintenance, and replacement costs, increased costs from any necessitated purchase of supplemental power, and including reasonable credit for any offsetting benefits for the use of the conveyance system." Calleguas will calculate the wheeling charges in accordance with these requirements.

Response 8B

Project schedule is dependent on many factors, including City Council approval of the CEQA document and overall project approval. Ventura Water will proceed with the project as expeditiously as possible, dependent on necessary approvals. It has been assumed for the analysis that up to three open cut segments and two trenchless segments would be under construction at any time.

Response 8C

Project cost estimates include contingencies. City staff anticipate that the proposed mitigation measures and their associated costs fall within proposed project cost estimates including contingencies.

Response 8D

BIO MM-1 and BIO MM-2 are needed to avoid significant impacts to sensitive species though it may result in an extended construction schedule. The 30-month construction schedule discussed in the Draft EIR accounted for these mitigation measures. The City will schedule construction segments to avoid delays; e.g., work on those pipeline segments not subject to Least Bell's Vireo Avoidance Measures and Breeding Migratory Bird Avoidance measures during the restricted times (February 15 to August 15).

TR MM-1 is needed to avoid significant traffic impacts to Central Avenue although it may result in an extended construction schedule. The 30-month construction schedule discussed in the Draft EIR accounted for these mitigation measures. The City will schedule construction segments to avoid delays; e.g., work on segments besides Segment 10 during the school year.

From: burt handy [mailto:burthandy@gmail.com]

Sent: Monday, April 01, 2019 1:16 PM

To: Cooper, Betsy

Subject: Re: Re EIR

Hi Betsy

Sections 2.18.12 and 4.3.18 refer to Ojai Sanitary District, and it also lists Casitas Water District,,,However there are more than 100 Water Districts in the Ventura Area which could be affected by the pipeline if you are saying the geographic scope covers these two agencies ... 9A

Burt Handy

Letter 9

COMMENTER: Burt Handy

DATE: April 1, 2019

RESPONSE:

Response 9A

Sections 2.18.1.2 and 4.3.18 describe the water and wastewater utilities whose provision of service or manner in which they provide service may be affected by the proposed project. While there are many water agencies in Ventura County, the proposed project only envisions changes to the operations and supplies of Casitas, the City of Ventura, United, and Calleguas. Crestview Mutual Water Company and the City of Camarillo are discussed as these agencies have facilities in the vicinity of the pipeline construction corridor.

DEPARTMENT OF TRANSPORTATION
DISTRICT 7 – Office of Regional Planning
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 897-0673
FAX (213) 897-1337
www.dot.ca.gov

Making Conservation a California Way of Life.

March 28, 2019

Ms. Betsy Cooper
City of Ventura, Ventura Water Dept.
501 Poli Street
Ventura, CA 93002

RE: State Water Interconnection Project
Draft Environmental Impact Report (DEIR)
SCH#2018031010
GTS #07-VEN-2018-00236
Vic. VEN/ 101 PM 17.627/ 118 PM 4.16
/126 PM 4.485/ 232 PM 0.415

Dear Ms. Cooper:

Thank you for including the California Department of Transportation (Caltrans) in the review process for the above-referenced project. The proposed project pipeline would be approximately 7 miles in length originating in the City of Ventura and traversing southerly and easterly through unincorporated Ventura County terminating in the City of Camarillo. The construction is projected to be short-term (approximately 30 months).

Based on a review of the Draft Environmental Impact Report (DEIR), Caltrans recommends the following:

- Haul trucks, construction vehicles, oversized vehicles and/or large size truck trips should be limited to off peak commute periods to lessen traffic impacts to the truck routing areas.
- Construction/hauling vehicles transporting materials (dirt, debris, trash, etc.) on freeway/ highway need to be secured from littering.
- Consider scheduling works on the weekends and after hours to help relieve traffic congestion during work day peak hours and have workers/employees carpooling to reduce trips during peak commuting hours.

10A

As a reminder, Caltrans standards for roadway closures and detours are no closure between 5 AM and 10 PM. In additional, Store water run-off is a sensitive issue for Los Angeles and Ventura counties. Please be mindful of your need to discharge clean run-off water and it is not permitted to discharge onto State highway facilities.

Any work to be performed within the State Right-of-Way will need an Encroachment Permit. APN 890070250 and 157-0-020-185, listed in Page 1-11 of DEIR, are located within proximity of State facilities. As the project moves forward and plans have been finalized, especially work on the two parcels will need to be reviewed by Office of Permits for possibilities of Encroachment Permit.

10B

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

Also, any transportation of heavy construction equipment and/or materials, which requires the use of oversized-transport vehicles on State highways, will require a Caltrans transportation permit. For information on the Permit process, please contact Caltrans District 7 Office of Permit at (213) 897-3631.

10C

If you have any questions or concerns, please contact project coordinator, Frances Lee at (213) 897-0673 or electronically at frances.lee@dot.ca.gov and refer to GTS#07-VEN-2018-00236.

Sincerely,

MIYA EDMONSON
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

Letter 10

COMMENTER: Miya Edmonston, Caltrans

DATE: March 28, 2019

RESPONSE:

Response 10A

The traffic and circulation study prepared for the SWP Interconnection Project identified one potentially significant impact related to construction traffic: the addition of peak hour trips to Central Avenue, a roadway that is currently operating at a less than acceptable level of service (see Draft EIR Section 2.16.3.2). To avoid this impact, Mitigation Measure TR MM-1 includes limiting construction of Segment 10 (proposed alignment) and Segments 7 and 11 (Alternative Alignment B) to periods when Rio Mesa High School is out of session. This mitigation measure would reduce impacts to less than significant. Given the results of the traffic and circulation study and the applicable mitigation measures, limiting construction truck trips to outside peak hours and only to weekends is unnecessary.

The City of Ventura agrees with incorporating into the project description a requirement that construction-related vehicles hauling loose materials (dirt, debris, trash) cover the materials so as to prevent littering. See Section 1.3 of this Final EIR.

Response 10B

As documented in Table 1-6 of the Draft EIR, the City of Ventura has identified the need for a Caltrans Encroachment Permit; the entity responsible for construction of segments subject to the Caltrans Permit would comply with permit requirements.

Response 10C

The potential need to obtain and comply with a Caltrans Transportation Permit has been added to the EIR. See Section 1.3 of this Final EIR.

From: burt handy [mailto:burthandy@gmail.com]
Sent: Wednesday, March 27, 2019 10:07 AM
To: Cooper, Betsy
Subject: Re Interconnect Draft EIR

Ms. Cooper

A couple of questions regarding the Draft EIR

What is the planned pipe size? The reference is to a 36-inch pipe however, it connects to a 24-inch pipe in Ventura….What is the planned size of pipe and capacity of the pipe in AFY, cfs, and MGD. 11A

It is not clear at all which size pipe will be used in the interconnect project, and the capacities of the size pipe which will be used??

How will this water be used to enhance quality? 11B

1.7 Project Objectives

The project would be designed to achieve the following objectives:

- Provide a near-term water supply source for the City to enhance supply reliability;
- Improve City water quality;
- Provide a backup supply for the City's other potential, long-term water supply options;
- Allow Casitas and United to receive their SWP entitlements; and
- Enable the City to deliver water to Calleguas during an imported water supply outage.

1.9.1 Connection to City of Ventura Water System 11C

The United connection would include a tee connection to the pipeline, isolation valves, a flow The City connection point is located along the existing 24-inch diameter pipeline on Henderson Road between South Saticoy Avenue and South Wells Road. This connection point was selected based on pipeline capacity and hydraulics (see Figure 1-2).

1.12.1 Annual Water Deliveries

Based on a hydraulic analysis performed, a 36-inch diameter pipeline could deliver as much as 18,800 AFY, if this volume of water was available. However, the availability of water is limited. DWR prepares a biennial report to assist SWP customers and local planners in assessing the near- and long-term availability of supplies from the SWP. DWR issued its most recent update, the 2017 DWR State Water Project Delivery Capability Report (DCR), in March 2018. In the 2017 update, DWR provides supply estimates for SWP customers to use in their planning efforts, including for use in Urban

Water Management Plans (UWMPs). The 2017 DCR includes DWR's estimates of SWP water supply availability under both current and future conditions.

Page 1-26 State Water Interconnection Project EIR – PUBLIC DRAFT DWR's estimates of SWP deliveries are based on a computer model that simulates monthly operations of the SWP and Central Valley Project systems. Key assumptions and inputs to the model include the facilities in the system, hydrologic inflows to the system, regulatory and operational constraints on system operations, and projected demands for SWP water. For example, the 2017 DCR uses the following assumptions to model current conditions: existing facilities, hydrologic inflows to the model based on 82 years of historical inflows (1922 through 2003), current regulatory and operational constraints, and demands at maximum Table A entitlements. To evaluate SWP supply availability under existing conditions, the 2017 DCR considers the impacts on SWP delivery capability due to climate change, sea level rise, and multiple Delta-specific concerns: the variability of Delta inflows seasonally and annually, the vulnerability of the Delta's conveyance system and structure due to floods and earthquakes, and water quality objectives that address Delta ecosystem health. Consideration is also given to the major Delta policy planning efforts currently underway: The Delta Plan and the California WaterFix. With these factors, the 2017 DCR projects that under existing conditions (2017), the average annual delivery of Table A water is estimated at 62%. In a very dry year or in the event of infrastructure failure, it is possible there would be no SWP delivery. Deliveries could also be impacted by capacity limitations in the MWD and Calleguas water transmission and treatment facilities because wheeling agreements would be for excess capacity not being used by MWD and

11C

Calleguas customers. More capacity would typically be available in the winter than in the summer.

1.12.2 Pumping Requirements

Flow from Calleguas to the City, and flow from the City to Calleguas, is expected to be by gravity. No pumping is required.

1.12.3 Maintenance Activities

Regular maintenance activities would include exercising the isolation valves and the valves for the air vacuum/release valves and blow-offs. Routine maintenance of the control valves, flow meter(s), and Supervisory Control and Data Acquisition (SCADA) equipment at the meter facility would also be required. This would generate approximately four trips a year, although more trips might be necessary during start up, testing, or shut down activities.

Burt Handy

Letter 11

COMMENTER: Burt Handy

DATE: March 27, 2019

RESPONSE:

Response 11A

As described in the Draft EIR, the pipelines would be a maximum of 36-inches in diameter. Based on a hydraulic analysis performed, a 36-inch diameter pipeline could deliver as much as 18,800 acre-feet per year (AFY), if this volume of water were available. Final sizing of the pipelines will be decided during the agency agreement process and during final design. As part of the SWP Alignment Study (one of the Draft EIR references), flow ranges for various pipeline diameters were estimated in both AFY and cubic feet per second (cfs).

Response 11B

A discussion on the proposed project's effect on water quality has been added to the EIR; see Section 1.3 of this Final EIR.

Response 11C

This appears to be text copied and pasted from the Draft EIR and does not contain any comments; no response required.

From: burt handy [mailto:burthandy@gmail.com]
Sent: Tuesday, April 02, 2019 12:26 PM
To: Cooper, Betsy
Subject: Re Interconnect questions

Section 1.2

This section addresses the average per capita per day (GPCD) as currently 117 gallons in 2015. This needs to address two areas

1.. The legislation passed last year (AB 606 and SB 1668) which establishes water usage for inside residents at 55 GPCD in 2020, 52.5 GPCD in 2025 and 50 GPCD in 2030.

2. This section does not address the most recent numbers for the city of Ventura (From the 2018 CAFR) or the records from Ventura Water for the calendar year 2018.

12A

Table A Water

1. Information on the State Water Project does not include the average amount of Table A water which has been available over the last 30 years and 10 years....This should be included in the report to show the amount of water available...ie if there is 10000 AF available in Table A and the Average available over the 30 years is 80 % then the amount available each year would be 8000 AF...

12B

Water Quality

1. Re Mixing on page 1-5 This section addresses the way to low quality water to a higher standard by using another source. The only one listed is the Oxnard Plains which is in critical overdraft.

This does not show how the state Water is a high quality water which could be used for mixing to bring Ventura's water into compliance with the State Water Board.

12C

Burt Handy

Letter 12

COMMENTER: Burt Handy

DATE: April 2, 2019

RESPONSE:

Response 12A

The City is implementing conservation measures. But even with conservation, supplemental water may be needed. As documented in the Draft EIR Section 1.2 (as well as the Ventura Water 2018 Comprehensive Water Resources Report and Ventura Water 2015 Urban Water Management Plan), even with projected conservation water demands are projected to increase. Unfortunately, water conservation would not meet all the project objectives. Conservation would not improve City water quality, would not provide a backup supply for the City's other (local) water supplies, would not allow Casitas or United to receive their SWP entitlements, or enable the City to deliver water to Calleguas during an imported water outage.

Response 12B

Section 1.12.1 of the Draft EIR provides information on the anticipated long-term deliveries of the SWP Interconnection as evaluated in the Final State Water Project Delivery Capability Report 2017. While it is possible to look at specific timeframes, the anticipated long-term deliveries are appropriate for evaluation of the SWP Interconnection.

Response 12C

A discussion on the proposed project's effect on water quality has been added to the EIR; see Section 1.3 of this Final EIR.

City of Camarillo

Department of Public Works

601 Carmen Drive, Camarillo, CA 93010
Office: 805.388.5340 - Fax: 805.388.5387

April 2, 2019

email: bcooper@cityofventura.ca.gov

City of Ventura
Ventura Water
501 Poli Street, Room 120
Ventura, CA 93002-0099

Attn: Betsy Cooper

Subject: Comments on Draft Environmental Impact Report
State Water Interconnection Project

Lead Agency: City of San Buenaventura

Project Description Summary: The Project would enable delivery of State Water Project (SWP) water by wheeling water through the Metropolitan Water District of Southern California (MWD) and Calleguas Municipal Water District (Calleguas) water systems to the City of Ventura.

Thank you for the opportunity to review and comment on the subject Draft Environmental Impact Report prepared by Kennedy/Jenks Consultants for the City of San Buenaventura Ventura Water with a review period from February 19, 2019 to April 5, 2019. A portion of the Project will occur within the western portion of the City of Camarillo and will terminate at the existing Calleguas Springville Reservoir near the intersection of Camino Tierra Santa and Via Zamora in the City of Camarillo. The Project will also be near Central Ave, US101 and Springville Drive.

After reviewing the Notice of Preparation, the City of Camarillo offers the following comments:

1. Encroachment Permit, including traffic control plans, will be required for review and approval by the City of Camarillo Public Works Department for work within the City of Camarillo public Rights-of-Way. 13A

2. Tentative Tract Map 5671M(3) is pending on 43.3 acres located west of Springville Drive, north of U.S. 101. The subdivision is for the development of 158 detached condominium units. The proposed pipeline is located on the westerly boundary of the subdivision and will require coordination to ensure that no permanent structures would be located on top of the pipeline. 13B

3. There is an existing eucalyptus windrow where the pipeline in proposed, west of Springville Drive. The EIR does not state what measures will be taken to prevent damaging or impacting the trees and its root structure, or mitigation to replace any lost trees. The windrow serves the purpose of providing for an agricultural buffer and will need to be maintained for the development of the vacant land to the east that is proposed for residential development. 13C

4. The EIR should acknowledge the presence of single-family residential uses adjacent and near the project that could be impacted by construction noise and trenching activities. Construction within the City of Camarillo must comply with CMC Section 10.34.120 Construction, Buildings and Structures. It is unlawful for any person adjacent to or within any residential zone in the city to operate power construction equipment or tools or perform any outside construction or repair work on buildings, or structures to operate any pile driver, steam shovel, pneumatic hammer, steam or electric hoist, or other construction device between the hours of seven p.m. of one day to seven a.m. of the next day or at any time on any Sunday, or at any time on any public holiday, in such a manner as to violate the noise standards set forth in CMC Sections 10.34.040, 10.34.050, or 10.34.060. 13D

5. Design and locations of any above-ground structures must be submitted to the City of Camarillo Community Development Department for review and approval. 13E

6. The City of Camarillo CIP Division has concerns related to the Project due to planned future City of Camarillo Capital Improvement Projects (CIP) and impacts to these projects. The City of Camarillo CIP projects will generally be in existing City of Camarillo Rights-of-Way on Daily Drive and Central Avenue which will require coordination on the design of the Project's proposed pipeline and alignment. Some of the improvements proposed by the City of Camarillo will require right-of-way acquisition. The City of Camarillo requests that the City of Ventura coordinate on construction timing and Right-of-Way impacts/acquisition. The City of Camarillo is requesting that any pipeline structures and surface features (air vac, blow offs, manholes, etc) be placed so they do not interfere with City of Camarillo infrastructure. The City of Camarillo has gravity lines (sewer or drainage) and a box culvert that may be crossing the alignment of the Ventura Waterline Project, so planning and coordination to accommodate crossings will be necessary and utility crossings (dips) in the waterline will need to be constructed. 13F

7. Due to the extensive construction timeline anticipated, the City of Camarillo is requesting that streets receiving heavy equipment traffic be repaired after pipeline construction. and an overlay, reconstruction or other treatments are anticipated to be necessary, depending on the level of damage. This includes the pipeline alignment, haul routes and any other streets receiving construction traffic. Sometimes, caving of pipeline trenches occurs and pavement damage occurs and these issues will require repairs by the City of Ventura. Coordination on planned overlays and resurfacing projects will also be needed. 13G

8. Ventura County Transportation Commission (VCTC) has future planned projects in the proposed pipeline alignment area, and the City of Camarillo recommends that the City of Ventura coordinate with VCTC to get further details to avoid conflicts.

13H

If you have any questions or need clarification, please feel free to contact Tali Tucker, Assistant Director/City Engineer, at (805) 388-5343 or at ttucker@cityofcamarillo.org.

Sincerely,

David Klotzle
Director of Public Works

c: Joseph R. Vacca, AICP, Director of Community Development
Tali Tucker, P.E., Assistant Director of Public Works/City Engineer

Letter 13

COMMENTER: David Kotzle, City of Camarillo

DATE: April 2, 2019

RESPONSE:

Response 13A

As described in Table 1-6 of the Draft EIR, the project would need an encroachment permit from the City of Camarillo.

Response 13B

It is anticipated that the SWP Interconnection would be installed outside of the area where Tentative Tract Map 5671(3) will have permanent structures as the area near the pipeline alignment is planned for a park site and open space; this would be confirmed as part of final design of the SWP Interconnection. If necessary, the alignment of the SWP Interconnection would be adjusted and, if adjustment to the alignment occurs, the need for additional CEQA review would also be evaluated. Requirements to keep the area above the pipeline clear of permanent structures would be formalized in easements acquired for the project.

Response 13C

In order to avoid other pipelines within the road along which Segment 19 would be installed, the SWP Interconnection would be placed at the eastern edge of the roadway, outside of the area of the windrow trees.

Response 13D

The Draft EIR does acknowledge the presence of residences in the vicinity of Segment 19 that could be affected by construction noise (see page 2-111). The Draft EIR evaluates the existing noise environment in this area (see Table 2.12-3 on page 2-112) and discusses City of Camarillo Municipal Code as it relates to noise (see Section 2.12.3 on page 2-115). The potential noise impacts on residences near the pipeline installation were considered to be potentially significant and noise mitigation would be required.

Response 13E

No above-ground structures are anticipated in the City of Camarillo, other than manholes, vents, and small cabinets or housings; this would be confirmed as part of final design.

Response 13F

The SWP Interconnection alignment was selected to minimize utility impacts; as part of final design, potential utility conflicts, including work to be performed by the City of Camarillo, would be examined in detail and conflicts avoided to the extent possible. If necessary, the alignment of the SWP Interconnection would be adjusted and, if adjustment to the alignment occurs, the need for additional CEQA review would also be evaluated.

Response 13G

As described in Table 1-6 of the Draft EIR, the project would need an encroachment permit from the City of Camarillo. The encroachment permit process would include any requirements for repairing streets affected by construction, construction traffic, and equipment.

Response 13H

The Draft EIR was provided to the Ventura County Transportation Commission who did provide comments (see Letter 16), but did not identify any planned projects affected by the SWP Interconnection. The SWP Interconnection alignment was selected to minimize utility impacts; as part of final design, potential utility conflicts would be examined in detail and conflicts avoided to the extent possible. If necessary, the alignment of the SWP Interconnection would be adjusted and, if adjustment to the alignment occurs, the need for additional CEQA review would also be evaluated.

From: hancocklaw@aol.com [mailto:hancocklaw@aol.com]
Sent: Tuesday, April 02, 2019 3:37 PM
To: Cooper, Betsy
Subject: COMMENT ON DRAFT EIR RE STATE WATER CONNECTION

Dear Ms. Cooper,

Here is a comment from me on the draft EIR for the State Water Interconnection Project:

I disagree with the statement, in the draft EIR for the State Water Interconnection Project, that local water supplies are currently sufficient to meet demands. That statement does not consider the quality of water currently delivered to Ventura households, especially on the east end. Currently, the delivered water, which is groundwater, is hard, chemical and/or mineral laden, smelly and dirty. It corrodes and reduces the life of appliances and fixtures, and requires softening and filtering. Instead of doing an EIR to figure out the impacts of bringing State Water to Ventura, I would suggest that it would be more appropriate to do an EIR to determine the long term biological consequences of continuing to purvey and use local groundwater for drinking. A Ventura councilmember has said that a hope is to "mix" the State water with the local groundwater. That says it all. The local product is degraded to begin with. 14A

The water that would come from such a pipeline is needed for, and should be used to supply, current Ventura residents, not to fuel additional growth, or to force potable water reuse down our throats. The point of it should be better quality water for current residents, not just one more source for development. A point of the book: *Cadillac Desert* is that you shouldn't be building beyond your resources. Having to import State water is already a sign that local water resources aren't enough. Using that water to help future growth would just be more deficit financing.

It is my understanding that the current EIR deals with building a connection for state water to Ventura and that a further EIR will deal with the potential potable reuse project. I am in favor of the state water connection, if used to improve the water for current residents.

I oppose potable water reuse for a number of reasons. If the City can't deliver good quality water at present, how much less likely will it with water that was not and is not good to begin with? 14B

Mark E. Hancock Ventura, CA

Letter 14

COMMENTER: Mark Hancock, Law Offices of Mark Hancock

DATE: April 2, 2019

RESPONSE:

Response 14A

A discussion on the proposed project's effect on water quality has been added to the EIR; see Section 1.3 of this Final EIR.

Response 14B

As described in Section 1.2 and Section 1.6 of the Draft EIR, the project would make up for losses in annual yield from Lake Casitas, the Ventura River, and groundwater. The SWP, a regional water supply source, would compensate for these lost local supplies but would not result in the City having a greater annual volume of supply than it has historically had. Because the proposed project is making up for local supplies it is not growth inducing; because the proposed project provides a different, regional, supply, it enhances water supply reliability.

The purpose of the proposed project is to make it possible to:

- Deliver SWP water to the City of Ventura to offset losses in existing water supplies.
- Make in-lieu deliveries to Casitas to offset losses in existing water supplies.
- Provide the infrastructure so that United can take direct delivery of its SWP water to offset decreases in groundwater replenishment and provide an emergency connection for the O-H system.
- Provide water supplies to Calleguas during an outage of imported water.

The project would not create a new water demand, nor provide capacity to meet projected future water demands. As stated in CEQA Guidelines Section 15126.2(d), "indirect" growth inducement can include "reducing obstacles to population growth," such as water supply. Growth inducement may result in adverse impacts if the growth is not consistent with local land use plans and growth management plans and policies for the area; this "disorderly" growth could indirectly result in additional adverse environmental impacts. The City's adopted General Plan guides the type, location, and level of land use and development planned for the City. The environmental impacts of this growth were addressed in the City of Ventura 2005 General Plan Final Environmental Impact Report (General Plan Final EIR). Because the proposed project will not promote growth beyond the growth permitted by the General Plan and evaluated by the General Plan Final EIR, the proposed project is not growth-inducing.

MEINERS OAKS WATER DISTRICT
VENTURA COUNTY SINCE 1948
(805) 646-2114
202 WEST EL ROBLAR DRIVE

Meiners Oaks Water District, 202 W. El Roblar Drive, Ojai, CA 93023

City of Ventura, Ventura Water
501 Poli Street
Ventura, CA 93002-0099

March 25, 2019

Subject: MOWD's Comments on the Public Draft EIR for the State Water Interconnection

Attn: Ms. Betsy Cooper

The purpose of this letter is to provide MOWD's comments on the Draft EIR for the *State Water Interconnection Project*. Overall, we think the EIR is well-written and adequately considers the environmental impacts of the project. MOWD supports direct or in-lieu importation of State water into the Ojai Valley to ensure our water supply during drought periods. Note that growth within our agency's boundaries is very slow.

Our primary comment is related to the project need and does not affect your impact analysis. MOWD is one of Casitas MWD's resale agencies that are discussed in the EIR as a group. As stated in the EIR, during dry periods some resale agencies, including MOWD, rely exclusively on deliveries from Lake Casitas. What is not clear in the EIR is that, if Lake Casitas were to fall below minimum pool, we would have no water for our customers. The effect on our community would be devastating. Long-term importation of State water will reduce the chance of the lake going dry.

15A

Casitas MWD intends to update its safe yield estimate based on modem statistical methods. We are not asking you to develop new information, but to consider how to mention, within the EIR, valley-wide concerns about the lake going dry, which are driving local interest in this project. If you need a citation, you may mention Supervisor Steve Bennett's working group of agencies, including the City of Ventura, who meet regularly on this topic.

15B

We thank you for the opportunity to comment, and hope you will proceed with this long overdue project.

Sincerely,

James Kentosh, Vice President
Meiners Oaks Water District

Mike Krumpschmidt, Director
Meiners Oaks Water District

Letter 15

COMMENTER: James Kentosh, Vice President, Meiners Oaks Water District
Mike Krumpschmidt, Director, Meiners Oaks Water District

DATE: March 25, 2019

RESPONSE:

Response 15A

Thank you for your comment.

Response 15B

The comment has been noted. Section 1.5 of the Draft EIR discusses Casitas MWD's need for the proposed project.

Ventura County Transportation Commission

April 4, 2019

Ms. Betsy Cooper
City of Ventura, Ventura Water 501 Poli Street
Ventura, CA 93002-0099

Subject: State Water Interconnection Project SCH No. 2018031010) Project Comments

Dear Ms. Cooper,

The Ventura County Transportation Commission (VCTC) has reviewed the Notice of Availability and Draft Environmental Impact Report for the proposed State Water Interconnection Project. After a review of the subject documents, VCTC recommends that Ventura Water consider the following comments:

1. Page 1-28, Table 1-6 lists the permits that are anticipated to be necessary to implement the Project. Table 1-6 includes a Right-of-Way Encroachment Agreement for Southern California Regional Rail Authority for Segment 2. This is incorrect, Segment 2 cros 16A the VCTC owned rail line and as such, Right-of-Way agreements and other pertinent documents necessary to encroach on the rail line are required to be obtained from VCTC.
2. As part of the proposed Project's construction impacts, identify all local/municipal transportation agencies that will be impacted by work conducted within the roadw 16B include adequate notification as part of the Project's mitigation measures.

Thank you for the opportunity to provide comments on this Project. Please feel free to contact me if you have questions or would like clarification on the comments above.

Respectfully,

Steve DeGeorge Planning Director

Letter 16

COMMENTER: Steve DeGeorge, Ventura County Transportation Commission

DATE: April 4, 2019

RESPONSE:

Response 16A

Table 1-6 of the Draft EIR has been corrected as suggested by the commenter; please see Section 1.3 of this Final EIR.

Response 16B

The City of Ventura agrees and incorporated into the project description a requirement that, before beginning construction that would encroach on public roadways, the contractor provide notice to local transportation agencies about the schedule and location of construction. See Section 1.3 of this Final EIR.

california water impact network

April 3, 2019

City of Ventura, Ventura Water
Betsy Cooper
501 Poli Street
Ventura, CA 93002-0099

Draft EIR
K/J Project No. 1744205*00.

Dear Ms. Cooper:

The California Water Impact Network (CWIN) herewith submits it comments to the Draft EIR on the State Water Interconnection Project, K/J Project No. 1744205*00.

C-WIN believes this document does not give a full analysis of Indirect Impacts and Cumulative Impacts according to CEQA Guidelines. Under CEQA the following two impacts (besides direct impacts) must be considered:

"1. Indirect or secondary effects that are reasonably foreseeable and caused by a project, but occur at a different time or place. The CEQA Guidelines state the following:
An indirect physical change in the environment is a physical change…which is not immediately related to the project, but which is caused indirectly by the project. If a direct physical change in the environment in turn causes another change in the environment, then the other change is an indirect change in the environment (Section 15064 (d)(2)).

…Indirect or secondary effects may include growth-inducing effects and other effects related to induced changes in the pattern of land use, population density, or growth rate, and related effects on air and water and other natural systems, including ecosystems (Section 15358)(a)(2))."

2. Cumulative effects. Section 15355 of the CEQA Guidelines states: "Cumulative impacts" refers to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.
(b) The cumulative impact from several projects is 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.

While the DEIR describes the physical environment and construction impacts of the State Water Project (SWP) pipeline connection, it does not consider

808 Romero Canyon Rd., Santa Barbara, CA 93108, caroleekrieger7@gmail.com, phone: (805) 969-0824, fax: (805) 565-3394, www.c-win.org

the resulting cumulative and indirect impacts associated with bringing State Water to Ventura County through this pipeline for use by its several water purveyors.

A. Cumulative and Indirect Impacts

The State Water Resources Control Board (SWRCB) has never actually quantified the amount of consumptive water available in the Delta watershed. It is generally recognized that the SWP is oversubscribed.

Oversubscription of State Water Project (and Bureau of Reclamation Central Valley Project (CVP) has led to the decimation of the Bay/Delta and its ecosystem as shown by numerous studies. These studies and reports include the California Fish and Game Commission's 2009 listing of longfin smelt under the Endangered Species Act; the US Fish and Wildlife Service's 2008 Biological Opinion for Delta smelt; the National Marine Service June 4, 2009 Biological Opinion on Central Valley Project (CVP) and State Water Project (SWP) Operations; the State Water Resources Control Board's Bay-Delta Water Quality Control Plan and Water Rights Decision 1641; the CALFED Bay-Delta Program's 2000 Ecosystem Restoration Program Plan; and the Central Valley Project Improvement Act's Anadromous Fish Restoration Program.

1. SWP Contracts - As originally envisioned, the SWP was thought to be able to provide 4.23 million acre-feet of water each year to contractors. This resulted in each contractor opting for a certain amount of water as outlined in Table A of their contracts. It became apparent that the State would never be able to deliver the requested amounts of Table A water. Nevertheless, the DWR and the State Water Resources Control Board (SWRCB) continue to promote the Project as available water for development and as insurance. This water, which isn't available in reality, became known as "paper water" as cited by the Court (*Planning and Conservation League v. Department of Water Resources 2000 83 CAL.APP 4th 892*)).

2. Oversubscription - The SWRCB has offered contracts for 5.5 times the amount of water available from north of the Delta water rights. After a 3 year review C-WIN verified this fact[1]. A UC Davis Study has corroborated this evidence.[2]

3. The Delta Reform Act - Oversubscription was recognized by the State when the Legislature passed the 2009 Delta Reform Act. This act requires all

17A

1 https://static1.squarespace.com/static/59ee697fa9db0955b9b1c0ba/t/5c9fc4cf1837780001e3c10f/1553974534364/CWIN-SB_Report_FULL.pdf

2 IOP Science blog, 100 years of California's water rights system: patterns, trends and uncertainty
Theodore E Grantham1 and Joshua H Viers2
Published 19 August 2014 • © 2014 IOP Publishing Ltd

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south of the Delta water users to reduce their dependence on the Delta watershed. It created the Delta Stewardship Council to devise a plan where both south of the Delta Contractors and the stakeholders in the Delta watershed would share northern California water while supporting the needs of the Bay/Delta eco-system. To date, that plan has not been completed or approved. Meanwhile, SWP and CVP operations cause impacts on the environment, and create uncertainty for SWP contractors.

Summation: When reviewing the above information, it becomes apparent that any new water deliveries from the SWP will only exacerbate the damaged eco-systems and water availability in northern California, and thus must be considered as indirect and cumulative impacts of the project. The over-subscription water rights issue will ultimately be decided in court. Moreover, as explained below, hooking up to the SWP could put Ventura's local water agencies in financial peril.

17A

B. **Project Alternative**
The City and County of Ventura and its various water users and purveyors should continue to explore augmenting <u>local</u> water sources including waste water treatment, groundwater management, desalination, conservation and others. In the long run, these will prove less expensive and more reliable than the financial burdens of SWP management/maintenance and its inability to deliver water in times of drought.

17B

<u>Reliability</u>: C-WIN wrote "The Santa Barbara Report" to submit as evidence in SWRCB hearings for the Change of diversion permit required by the Twin Tunnels. This report discusses cost and reliability as it relates to Santa Barbara's history with importing this water and gives an indication of percentage reductions facing all contractors. In summary, when Santa Barbara needs the water in times of drought, little is made available. South Coast water agencies Santa Barbara contracted allocation under Table A is 12,500 AF (The graph on page 4 illustrates amounts of State water received.)

The availability of state water under present operational rules is limited year-to-year by the amount of runoff experienced in each year. C-WIN has examined the 98-year hydrologic record of the Sacramento River and found that statistically, present operations can only provide a small fraction of Table A amounts during droughts. DWR has never performed a proper analysis to determine a truly reliable level of delivery. Without such analysis, it is fruitless to propose structural solutions to the Delta's problems, given that precipitation is the main limiting factor.

17C

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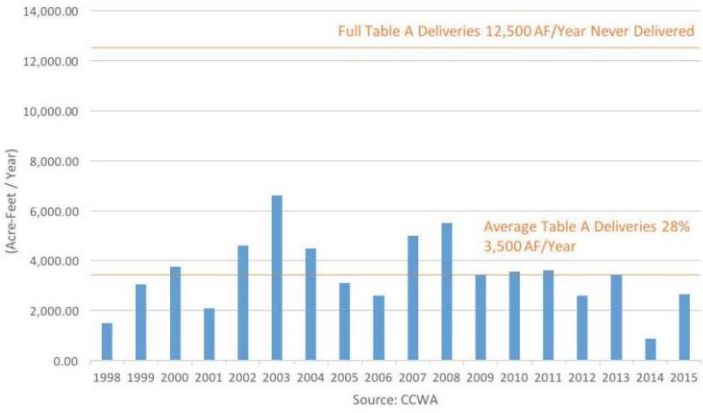
Full Table A Allocations have never been delivered by the SWP and are unlikely to ever be delivered because of limited availability in times of drought and lack of need during wet years when the water is available. Since State water contractors are junior water rights holders to those areas that feed the Delta, reliability will continue to be a problem.

Figure 6
Santa Barbara South Coast Districts Table A Deliveries
(Full Table A Deliveries are 12,500 AF)



Page 1-6 of the Draft EIR says *"The proposed State Water Interconnection Project is not anticipated to provide any increased water supply volume for the City and, thus, is not being considered in that [sic] EIR. However, the project would improve system reliability by providing access to a replacement supply source for the water supplies that have been reduced or otherwise become less available."* Based on this statement from the Pipeline Project Description, it appears that unreliability of the SWP has not been sufficiently analyzed by this report. Nor, can the Draft EIR's repeated rejection of growth inducement impacts be accepted. To C-WIN's knowledge, no permitting jurisdiction in Ventura County has accepted the concept of limiting growth to water sources other than State water.

Cost: Once hooked up to the State Water system, contractors are forever responsible for the costs associated with the maintenance and new infrastructure of the entire SWP system. Water agencies must pay the fixed costs

17C

17D

17E

808 Romero Canyon Rd., Santa Barbara, CA 93108, caroleekrieger7@gmail.com, phone: (805) 969-0824, fax: (805) 565-3394, www.c-win.org

for the amount of water contracted, regardless of the amount delivered annually. In wet years, when local water supplies are plentiful and State water is not needed, contractors continue to pay capital costs of the whole system. Those most affected, the ratepayers, have no direct input into these maintenance and infrastructural decisions. In Ventura's case, the Metropolitan Water District (MWD) will be the big decider. Ultimately, DWR decides.

Examples of SWP Infrastructure Costs:

The Twin Tunnels (CAWaterFix) - The Twin Tunnels (which will provide no new water according to DWR) would add about $17 Billion dollars to contractors' invoices, pro-rated (DWR estimate). C-WIN estimates the total will be closer to $100 Billion with cost overruns and interest, which were not included in the DWR estimate. When southern San Joaquin Valley farmers balked at the cost to agriculture, MWD indicated it is willing to finance the major portion of these costs.

Oroville Dam Repairs -The Oroville Dam is operated by DWR, but it was built and is maintained using funds from agricultural and urban water agencies [SWP contractors] that store water at Lake Oroville, such as the Metropolitan Water District of Southern California. In 2017 the major spillway from the dam collapsed. Costs to repair the spillway were $1.1 Billion. It was originally hoped that FEMA would supply 75% of the cost, but recently FEMA allowed repayment of only about 1/3, saying "the U.S. Army Corps of Engineers and the Independent Forensic Report have both cited insufficient maintenance and initial design flaws as playing a part in the failure of the spillway. " [3] FEMA's decision is under appeal.

17E

Santa Barbara's Lesson

The Santa Barbara Report[4] shows how the acre-foot costs of State water have been affected by curtailed delivery in drought years in the South Coast of Santa Barbara County. It shows the effective unit water cost per acre foot for SWP water; *the cost of supply divided by the actual water delivered*. It compares the effective unit costs of state water against the effective unit cost of local sources for each of the four South Coast districts The costs shown in the Table on page 6 do not include Article 21 surplus water, Turn-back Pool water, or Carryover water or deliveries of and costs for supplemental purchased water, which would be higher. The Table represents the years 2010-2015.

3 Dale Kasler and Ryan Sabalow, *Sacramento Bee*, March 11, 2019

4 https://static1.squarespace.com/static/59ee697fa9db0955b9b1c0ba/t/5c9fc4cf183778000 1e3c10f/1553974534364/CWIN-SB_Report_FULL.pdf

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california water impact network

	SWP Average	Worst year, 2014 SWP Drought	Avg. Cachuma	Avg. Groundwater	Avg. Recycled
Goleta	$8,150AF	$21,500AF	$240AF	$376AF	$707AF
City of Santa Barbara	$12,299AF	$28,200AF	$240AF	$610AF	$1,450AF
Carpinteria	$8,800AF	$19,800AF	$240AF	$144AF	
Montecito	$15,132AF	$30,600AF	$310AF	$516AF	

The result of continuing high and higher fixed costs for water agencies' budgets have placed some water purveyors in financial jeopardy. To meet budget needs, water rates are increased, resulting in lower water usage and less income. Increased meter charges have been adopted to make up for some of the shortfall. Meanwhile, the cost of supplemental water from out of the area continues to escalate.

17E

Conclusion:

The Draft EIR has not examined sufficiently the completed pipeline's environmental impacts. The impacts of connecting to State Water will have a deleterious effect on the environment of the Bay/Delta both cumulatively and indirectly. DWR has never performed a proper analysis to determine a truly reliable level of delivery. It seems foolhardy to invest in a project (SWP) that can't be relied upon, is costly and which cost cannot be influenced directly.

C-WIN hopes these comments will encourage Ventura's water purveyors to rethink their support of this project and work for more local solutions, augmenting local water sources including wastewater treatment, groundwater management, desalination, and conservation.

17F

Sincerely,

Carolee Krieger

Carolee Krieger, C-WIN Executive Director

808 Romero Canyon Rd., Santa Barbara, CA 93108, caroleekrieger7@gmail.com, phone: (805) 969-0824, fax: (805) 565-3394, www.c-win.org

Letter 17

COMMENTER: Carolee Krieger, California Water Impact Network

DATE: April 3, 2019

RESPONSE:

Response 17A

Commenter is concerned that the proposed project represents a new diversion from the Sacramento-San Joaquin Delta. This is not the case; under the No Project Alternative, the City of Ventura and Casitas SWP Table A allocation is diverted from the Delta. Section 2.6.3.3 in the Draft EIR describes SWP operations under the No Project Alternative. Without the proposed project, the SWP Allocations for the City of Ventura and Casitas would continue to be sold to other SWP contractors or to the DWR Turnback Pool Program. Review of the SWP management records (2007-2016) shows that the majority of water sold to the Turnback Pool Program is purchased by Southern California entities (MWD, Antelope Valley-East Kern Water Agency, Desert Water Agency, San Gorgonio Pass Water Agency, Coachella Water District) or Southern San Joaquin Valley entities (Kern County Water Agency, Tulare Lake Basin Water Storage District). From 2007-2016, 80 to 90 percent of all water in the Turnback Pool Program was sent to either Southern California or the Southern San Joaquin Valley.

Response 17B

The alternative local water sources recommended by the commenter—wastewater treatment, groundwater management, desalination, and conservation—do not meet the project objectives. Specifically, none of these options, individually or in combination, would provide a backup supply for the City's other (local) water supplies, allow Casitas or United to receive their SWP entitlements, and enable the City to deliver water to Calleguas during an imported water outage.

Response 17C

The reliability of the SWP supply is described in the Draft EIR (Section 1.12.1), based on the DWR Delivery Capability Report. As discussed in that section, over the long-term the SWP is anticipated to deliver 62% of each contractor's Table A amount, but in a very dry year or in the event of infrastructure failure, the SWP may deliver no water. However, a drought in the Ventura area does not necessarily mean a drought for the SWP. From 2012 to 2018 the City of Ventura was considered to be in drought (based on the USDA Drought Monitor (https://droughtmonitor.unl.edu/Maps/MapArchive.aspx). In 2017, the area supplying the SWP was not considered to be in drought and delivered 85 percent of Table A allocations.

Response 17D

As described in Section 1.2 and Section 1.6, the project would make up for losses in annual yield from Lake Casitas, the Ventura River, and groundwater. The SWP, a regional water supply source, would compensate for these lost local supplies but would not result in the City having a greater annual volume of supply than it has historically had. Because the proposed project is making up for local supplies, it is not growth inducing; because the proposed project provides a different, regional, supply, it enhances water supply reliability.

The purpose of the proposed project is to make it possible to:

- Deliver SWP water to the City of Ventura to offset losses in existing water supplies.
- Make in-lieu deliveries to Casitas to offset losses in existing water supplies.
- Provide the infrastructure so that United can take direct delivery of its SWP water to offset decreases in groundwater replenishment and provide an emergency connection for the O-H system.
- Provide water supplies to Calleguas during an outage of imported water.

The project would not create a new water demand, nor provide capacity to meet projected future water demands. As stated in CEQA Guidelines Section 15126.2(d), "indirect" growth inducement can include "reducing obstacles to population growth," such as water supply. Growth inducement may result in adverse impacts if the growth is not consistent with local land use plans and growth management plans and policies for the area; this "disorderly" growth could indirectly result in additional adverse environmental impacts. The City's adopted General Plan guides the type, location, and level of land use and development planned for the City. The environmental impacts of this growth were addressed in the City of Ventura 2005 General Plan Final Environmental Impact Report (General Plan Final EIR). Because the proposed project will not promote growth beyond the growth permitted by the General Plan and evaluated by the General Plan Final EIR, the proposed project is not growth-inducing.

Response 17E

The City of Ventura, Casitas, and United already have SWP entitlements and are obligated to pay the referenced costs. No additional response is necessary since the comment does not raise significant environmental effects.

Response 17F

Please see responses 17A through 17E.

Lauren Everett

Subject: FW: State Water Interconnect Project EIR submission
Attachments: Saticoy to Piru and Lake Castaic.jpg; Piru to Freeman Diversion by United Staff with estimated costs.jpg

From: burt handy [mailto:burthandy@gmail.com]
Sent: Thursday, April 04, 2019 8:18 PM
To: Cooper, Betsy
Subject: State Water Interconnect Project EIR submission

In the Interconnect project Environmental Impact Report (EIR) only one option is listed. I believe there is another option which was not mentioned and needs to be evaluated in the EIR.

The Project objectives could also provide for all the stated objectives in **section 1.7**, which state::
Provide a near term water supply source for the City to enhance supply reliability
Improve City water quality
Provide a backup supply for the Cities othe potential, lonig-term water supply options
Allow Casitas and dUnited to receive their State Water Project (SWP) entitlements and
Enable the city to deliver water to Calleguas during n imported water supply outage.
Under section 1.10 The only alternative is listed as a route change from the same origin point and finish point.

This alternative should be evaluated in the EIR

A pipeline from Lake Piru or Lake Castaic to the Ventura city Saticoy treatment plant.
This alternative would be between 26 miles and 40 miles in length, would provide access to the SWP at either location, at a reduced cost. The cost of water in the state water resources bulletin 132-18 table b-24 shows the cost of water to Ventura is $1428.98 per Acre Foot AF and to Castaic Lake is $374.97, a savings of $1054.05 per AF.
This alternative would also allow for a higher flow of water to Ventura, and a back-up supply for the other SWP pipeline which runs 140 miles from Lake Castaic to Ventura.
This pipeline could also provide raw (untreated water) to Ventura where it could be treated to the city of Ventura and to Calleguas through an existing SWP pipeline running through Oxnard.
This pipeline could also provide direct untreated water to United's spreading grounds, the city of Oxnard, the city of Port Hueneme, the cities of Santa Paula, Fillmore, Piru, and a source for Casitas to receive State Water.
The cost indicated for this interconnect for the pipeline is approximately 17 Million for Calleguas, and 22 Million for Ventura for a total cost of 39 Million.
The sizing for this pipeline, at 36" could provide approximately 50 Cubic Feet Per Second (CFS) and with a 48" pipe could provide approximately 75 CFS.(source evaluation by Uniited water presented on March 26, 2019)
This pipeline would also be a gravity pipeline from Piru or Castaic to Ventura.

This pipeline could also provide a backup for Calleguas, Thousand Oaks, and Simi Valley in the event the pipeline coming from Metropolitan Water District (MTD) failed or was out of service.

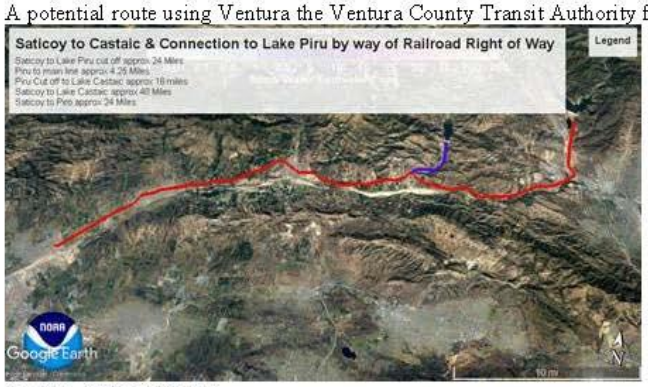
The information shows a conceptual design for pipelines presented by United Water, showing the potential alternate route and potential costs.

I believe this alternative should be evaluated in the EIR. ...

1

Source: Groundwater Meeting Presentation by United staff Page 25 on March 26, 2019, Dan Detmer, John Lindquist, and Bob Siemak

A potential route using Ventura the Ventura County Transit Authority for the routing..



Source...by Burt Handy

If you have any questions please contact

Burt Handy
P O Box 3842
Ventura, Ca. 93006-3842
burthandy@gmail.com
05-653-0537

Letter 18

COMMENTER: Burt Handy

DATE: April 4, 2019

RESPONSE:

Response to Letter 18

In an EIR the Lead Agency is obligated to analyze alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant environmental effects of the project. A connection to the SWP at Lake Piru or Castaic Lake may achieve water delivery objectives to the Oxnard Plain; however, it would not avoid or substantially lessen the significant effects of the proposed project. A Castaic/Piru pipeline would potentially require more infrastructure, including 26 to 40 miles of pipeline (rather than seven miles) and surface water treatment. A Castaic/Piru pipeline would not satisfy a key project objective, providing emergency water supplies to Calleguas and therefore does not qualify as a project alternative.

Lauren Everett

Subject: FW: State Water Interconnection Project (SCH No. 2018031010) Draft Environmental Impact Report Review Additional Comments

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From: Daniel Cormode [mailto:dcormode@sbcglobal.net]
Sent: Friday, April 05, 2019 11:27 AM
To: Cooper, Betsy
Cc: 'DANIEL CORMODE'
Subject: FW: State Water Interconnection Project (SCH No. 2018031010) Draft Environmental Impact Report Review Additional Comments

Betsy,

Discussion of projects social and economic impact on the environments is a mandatory requirement as described in the CEQA Guidelines.
The categorical denial of any social or economic impact is not supported by any factual discussion of the subject.

R/

Daniel Cormode
805-647-4063

From: Daniel Cormode [mailto:dcormode@sbcglobal.net]
Sent: 17 March, 2019 8:57 PM
To: 'DANIEL CORMODE'
Subject: FW: State Water Interconnection Project (SCH No. 2018031010) Draft Environmental Impact Report Review Additional Comments

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From: Daniel Cormode [mailto:dcormode@sbcglobal.net]
Sent: 14 March, 2019 11:01 AM
To: bcooper@cityofventura.ca.gov
Cc: citymanager@cityofventura.ca.gov; council@cityofventura.ca.gov; watercommission@cityofventura.ca.gov
Subject: State Water Interconnection Project (SCH No. 2018031010) Draft Environmental Impact Report Review Additional Comments

06 March 2019

From: Daniel Cormode
186 Gorrion Ave
Ventura, CA 93004

To: City of Ventura, Ventura Water
Betsy Cooper
501 Poli Street
Ventura, CA 93002-0099
bcooper@cityofventura.ca.gov

Letter 19

COMMENTER: Daniel Cormode

DATE: April 5, 2019

RESPONSE:

Response to Letter 19

When social or economic effects would have physical impacts on the environment, CEQA requires analysis of the physical impacts. The Draft EIR addresses all anticipated physical impacts on the environment. Therefore, the Draft EIR complies with Section 15131(a), which states:

> Economic or social effects of a project shall not be treated as significant effects on the environment. An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes. The intermediate economic or social changes need not be analyzed in any detail greater than necessary to trace the chain of cause and effect. The focus of the analysis shall be on physical changes.

Commenter did not provide linkage between project cost and a physical change in the environment.

Ventura County
Air Pollution
Control District

669 County Square Dr
Ventura, California 93003

tel 805/645-1400
fax 805/645-1444
www.vcapcd.org

Michael Villegas
Air Pollution Control Officer

VENTURA COUNTY
AIR POLLUTION CONTROL DISTRICT
Memorandum

TO: Betsy Cooper, City of Ventura- Ventura Water

DATE: April 1, 2019

FROM: Nicole Collazo, Planning Division

SUBJECT: Request for Review of Draft Environmental Impact Report (DEIR) for the Proposed State Water Interconnection Project (RMA 18-005-1)

Air Pollution Control District (APCD) staff has reviewed the DEIR for the project referenced above. The proposed project is a construction project that would enable direct delivery of State Water Project water to the United Conservation District (United). In addition, the interconnection would allow the City of Buenaventura to deliver water to the Calleguas Municipal Water District (Calleguas) during an outage of its imported water supplies. The project location is a 7-mile pipeline originating from the S portion of the City of Buenaventura (Henderson Road between South Saticoy Avenue and South Wells Road), and near Camino Tierra Santa and Via Zamora in the SW end of Camarillo. The Lead Agency for the project is the City of Ventura Engineering.

GENERAL COMMENTS

As a recommending agency for the CEQA review of the DEIR, APCD requests the following changes and additions to the DEIR:

Item 1- Page 2-14, Climatological Setting. We request the climate data obtained from the Oxnard Airport be updated to 2008-2018 to be consistent with current local weather conditions and the El Rio Monitoring Station data referenced in Table 2.3-2. 20A

Item 2- Page 2-25, Project-Specific Impacts. The discussion failed to discuss the potential exposure of pollutants to nearby sensitive receptors, such as the Sacred Heart School, Douglas Penfield School, Saticoy Elementary School and surrounding residential communities on either end of the pipeline connection transect (Henderson Rd. and Camino Tierra Santa). This item is one of the criteria found in the CEQA Guidelines Appendix G and VCAPCD Air Quality Assessment Guidelines (AQAG). The schools and parks are considered sensitive receptors by the AQAG and the California Air Resources Board (CARB), because children are in the developing stage and are more prone to respiratory illnesses and have higher breathing rates. The document proposed compliance with APCD Rule 51, Nuisance, and 55, Fugitive Dust and the mitigation measures found in the AQAG for the reduction of ozone precursors and particulate matter from construction equipment diesel exhaust. However, the AQAG is a 20B

guidance document and more modern mitigation measures can be proposed that will minimize toxic exposure to sensitive receptors within the vicinity of the project site, including the construction emissions estimated at 43.6 lbs./day ROC and 316.2 lbs./day NOx. The AQAG states "construction-related emissions should be mitigated if estimates of ROC and NOx emissions from the heavy-duty construction equipment anticipated to be used for a particular project exceed the 5 pounds per day threshold in the Ojai Planning Area, or the 25 pounds per day threshold in the remainder of the county" (Page 5-3).

Diesel particulate matter (DPM) is a primary component of exhaust emissions from heavy duty diesel construction equipment (on-road and off-road). The CARB and EPA have designated DPM as a toxic air contaminant (TAC), which has been found to account for 70-80% of the overall cancer risk from mobile source emissions (CARB 2005 Land Use Handbook, MATES IV Study, respectively). CARB, which regulates mobile source emissions, has also been mandated by the EPA to phase out older, dirtier on-road and off-road heavy-duty equipment via the Off-Road Diesel-Fueled Fleets Regulation and the On-Road Heavy-Duty Diesel Vehicles Regulation (more information for "Off-Road" and "On-Road" regulations). Some older-tiered equipment can still comply with the new air standards by retrofitting their equipment with DPM particulate filters and catalyst-based filters that incinerate NOx and other pollutants.

A qualitative approach can be used when reviewing potential TAC exposure to nearby sensitive receptors that would include construction duration, peak operational hours, number and type of equipment, and proximity of construction emissions to sensitive receptors. A more quantitative approach can be done by conducting a TAC screening analysis or Health Risk Assessment (HRA), which are typically not done for construction projects and not required in most air districts. More on TACs can be found in Section 6.5 of the AQAG.

Some examples of mitigation measures for construction equipment beyond what is recommended in the AQAG is using Tier 3 or greater for every off-road diesel equipment. We note compliance with the Off-Road state regulation already prohibits use of Tier 0, 1, and Tier 2 additions for medium and large fleets and Tier 2 phase-outs by 2023 for smaller fleets. This recommended measure is quite feasible due to the compliance requirements of the state Off-Road Diesel-Fueled Regulation. The CARB has recommended a buffer distance of 500 feet between sensitive land uses and sources of TACs (CARB 2005 Land Use Handbook). Another possible mitigation measure is requiring all on-road construction vehicles to be model year 2010 or greater. More information on this is found in the On-Road regulation found in the above link. The regulation requires a phasing out of pre-2010 diesel truck engines with full compliance for applicable trucks and buses by January 1, 2023. Newer models will have PM filters installed on them. which can effectively reduce DPM emissions by 85% or more, according to CARB.

Another possible mitigation measure would be to perform the construction activities that are near the schools mentioned in the DEIR during off-school hours or during the summer months while school is not in session or creating temporary vegetative barriers between the pollutant sources and the sensitive receptors along Henderson Rd.

Thank you for the opportunity to review this project's air quality impacts. If you have any questions, please call me at (805) 645-1426 or email nicole@vcapcd.org.

20B

Letter 20

COMMENTER: Nicole Collazo, Ventura County Air Pollution Control District

DATE: April 1, 2019

RESPONSE:

Response 20A

Climate data in the project area (Oxnard) has been updated in the Final EIR using the most recent 30-year averages (1981-2010). See Section 1.3 of this Final EIR.

Response 20B

Sensitive receptors identified in this comment are located adjacent to highway corridors (State Route 126 or U.S. Highway 101) where ambient levels of air pollutants (including diesel particulate matter) are relatively high. The project-related increase would be relatively minor and limited to a few weeks at any one receptor as the pipeline is installed. The proposed project would implement construction emissions reduction measures listed in the VCAPCD's Air Quality Assessment Guidelines.

Off-road diesel fueled fleets (including heavy equipment operated by construction contractors that would implement the proposed project) are regulated under Title 13 Section 2449 of the California Code of Regulations, which includes a mandated implementation schedule to phase in lower emissions engines over time. Under this regulation, no higher emissions engines (Tiers 1 and 2) may be added to a fleet after January 1, 2018. Therefore, the engines used in heavy equipment used to implement the proposed project (in 2020) are likely to be lower emissions engines (Tier 3 or better). Due to the short-term nature of project-related emissions, which will include emissions reduction measures required by the VCAPCD's Air Quality Assessment Guidelines and State law, there will be no significant air quality impacts. Note that pipeline installation adjacent to Rio Mesa High School would be conducted when school is not in session (see mitigation measure TR MM-1).

Ciuffetelli, Anthony

From: Venkat, Manjunath
Sent: Thursday, April 4, 2019 2:35 PM
To: Ciuffetelli, Anthony
Cc: Welch, Jennifer; Blackbern, Linda
Subject: RE: Outside Environmental Document Review: RMA# 18-005-1; Comments Due 04/4/2019

Tony:

I have reviewed this project, the supporting draft Environmental Impact Report and focused on the Biological Resources Section. Here are my findings and comments:

I find that the proposed project actions are not going to result in appreciable impacts to the wildlife corridors, reviewed in general and specifically in conjunction with the new wildlife corridor ordinances. Most of the project occurs in intensively managed agricultural lands or urban areas, and therefore, suitable habitat for special-status species or areas supporting significant wildlife movement does not exist, in general. However, where the project intersects the Santa Clara River, there are several important resource issues under consideration. This area is in fact, the most biologically sensitive area for the project and therefore, the following comments are warranted:

- The Biological resources section of the EIR does not identify the need for a Lake and Streambed Alteration Agreement (LSAA) permit from the California Department of Fish and Wildlife (CDFW). Although Horizontal Directional Drilling (HDD) is the proposed methodology to install the pipes across the Santa Clara River (SCR), and therefore, no direct alteration of the bed and bank of the river would occur; the potential risk from a frac-out during HDD operations warrants the need for a LSAA. It is advised that the EIR be revised to include procurement of this permit and/or indicate that consultation with CDFW would be undertaken, if an LSAA is needed.

- At the intersection of the proposed pipeline and the river, several protected species have been identified or could potentially occur. These include the Federally and State listed least Bell's Vireo and several aquatic species, including the Southern Steelhead. A frac-out during HDD operations could jeopardize these species. Therefore, an HDD Inadvertent Fluids Release and Contingency Plan is required. I did not see this Risk Contingency plan referenced in the Biological Resources section. If this release plan has been prepared for another section or for the proposed project, then it must be referenced in the Biological Resources Section.

- On page 94 of the EIR, the document states "the Project would not be located within 100 feet of any significant wetlands habitat. Installation of the proposed pipeline crossing of the SCR would occur at least 100 feet from any wetlands habitats." Based on this condition, there has been no further discussion of the potential for the project to impact biological resources to waters or wetlands. However, the County's Standards for Initial Study Biological Assessments (October 9, 2012) requires, however, that "if the waters or wetlands are within 300 feet (in non-coastal zone), potential impacts to the waters or wetlands must be evaluated." Therefore, the biological resources section must address the potential impacts from a frac-out, to biological resources that could potentially occur within the waterway of SCR. If this impacts analysis has been addressed in another section of the EIR (from a water quality perspective), this analysis must then be looked at in terms of what potential adverse impacts there may be to biological resources that may occur in the river.

21A

Thank you for the opportunity to comment. If you have any questions on my comments, please feel free to contact me. Thank you.

Manjunath Venkat | Planning Biologist

1

Residential Permits Section
manjunath.venkat@ventura.org

Ventura County Resource Management Agency | Planning Division
P. (805) 654-2498 | F. (805) 654-2509
800 S. Victoria Ave., L #1740 | Ventura, CA 93009-1740
Visit the Planning Division website at vcrma.org/planning.
Ventura County General Plan Update. Join the conversation at VC2040.org.
For online permits and property information, visit VC Citizen Access.

Letter 21

COMMENTER: Manjunath Venkat, Ventura County Resource Management Agency

DATE: April 4. 2019

RESPONSE:

Response 21A

The proposed project has been designed to avoid any impacts to streambeds, including actions that may divert or obstruct flow, substantially change or use any material from bed or bank, or deposit or dispose of any waste (see Section 1602 of the California Fish and Game Code). Therefore, a lake or streambed alteration agreement is not needed. Frac-out of drilling fluids is not anticipated, and the EIR provides a Frac-out Contingency Plan (see mitigation measure HAZ MM-3) to avoid and minimize potential impacts.

The County's Standards for Initial Study Biological Assessments do not apply to the project as the City is the lead agency and the project does not require a land use permit from Ventura County. In any case, the project has been designed to avoid wetlands, including directional drilling under the Santa Clara River.

County of Ventura
PUBLIC WORKS AGENCY
TRANSPORTATION DEPARTMENT
Traffic, Advance Planning & Permits Division
MEMORANDUM

DATE: 4/4/2019

TO: RMA Planning Division
Attention: Anthony Ciuffetelli

FROM: Anitha Balan, Engineering Manager II

SUBJECT: **REVIEW OF DOCUMENT 18-005-01** EIR
Project: **City of Ventura, Ventura Water**
Lead Agency: **City of Ventura**
Construction and operation of pipeline facilities that enable delivery of State Water Project water that has been wheeled through the Metropolitan Water District of Southern California and Calleguas Municipal Water District to the City of Ventura.
APN# 1280040195

Pursuant to your request, the Public Works Agency - Transportation Department has reviewed the EIR for the City of Ventura, Ventura Water.

Construction and operation of pipeline facilities that enable delivery of State Water Project (SWP) water that has been wheeled through the Metropolitan Water District of Southern California (MWD) and Calleguas Municipal Water District (Calleguas) to the City of Ventura. The pipeline facilities (interconnection) would also facilitate direct delivery of SWP water to United Water Conservation District (United) and direct or in-lieu delivery of SWP water to Casitas Municipal Water District (Casitas). In addition, the interconnection would allow the City to deliver water to Calleguas during an outage of Calleguas' imported water supplies. The interconnection would be a pipeline used to transport water between Calleguas' and the City's distribution systems.

The Water Supply Contract expires in 2035 but contains an extension option. Casitas, on behalf of the Joint Agencies, is working with DWR on an extension through approximately 2085.

The interconnection project consists of a connection to the Calleguas system, a pipeline of approximately 7 miles in length, a flow/pressure control and metering station at each United turnout for water delivery, a connection to the City's water distribution system, a flow/pressure control and metering station downstream of the City's connection point, and a blending/monitoring station within the City's system.

We offer the following comment(s):

1. The cumulative impacts of the construction of this project, when considered with the cumulative impact of all other approved (or anticipated) projects in the County, will be potentially significant. To address the cumulative adverse impacts of traffic on the Regional Road Network, Ventura County General Plan Goals, Policies, and Programs Section 4.2.2-6 and Ventura County Ordinance Code, Division 8, Chapter 6 require that the PWATD collect a Traffic Impact Mitigation Fee (TIMF). The appropriate Traffic Impact Mitigation Fee (TIMF) should be paid to the County prior to start of construction. The TIMF may be adjusted for inflation at the time of deposit in accordance with the latest version of the Engineering News Record Construction Cost Index.

22A

Based on the information provided in the Public Draft Environmental Impact Report for the State Water Interconnection Project this project will generate an ADT exceeding 200 ADT. In accordance with the reciprocal agreement between the City of Ventura and the County of Ventura a reciprocal fee is due. The City should deposit the TIMF reciprocal fee with the PWATD. The applicant/permittee may choose to submit additional information or provide an updated traffic study to supplement the information currently provided to establish the TIMF fee.

The trips being generated are over three different TIMF districts, Camarillo District 7, Oxnard District 8, and Ventura District 10. The traffic study produced and in the Draft EIR it is stated that there will be 104 trucks trips and 174 worker vehicle trips, this totals 278 average daily trips (ADT). The County based on Figure 1-2 in the Draft EIR established a percentage of pipeline installation that will occur in each district and distributed the ADT in each district based on this percentage. If Alternative Alignment B is selected, the City of Ventura shall notify the County of Ventura, Public Works Agency, Transportation Department to establish new percentages to each district and a new TIMF total.

Total ADT = 278 ADT

District 7 TIMF per ADT = $67.95

District 7 pipeline percentage = 27.7%

22A

Total District 7 TIMF = (0.277) x 278 x 67.95 = $5,232.56

District 8 TIMF per ADT = $69.93

District 8 pipeline percentage = 54.9%

Total District 8 TIMF = (0.549) x 278 x 69.93 = $10,672.86

District 10 TIMF per ADT = $55.63

District 10 pipeline percentage = 17.4%

Total District 10 TIMF = (0.174) x 278 x 55.63 = $2,690.93

Total TIMF Due = $18,596.35

The County of Ventura has a reciprocal agreement with the City of Oxnard and Camarillo. However, because this is not a project that the County of Ventura is the Lead Agency it is imperative that the City of Ventura contact both the City of Oxnard and Camarillo to determine whether or not a TIMF will be due to those agencies.

3

The County of Ventura, Public Works Agency, Transportation Department would like the documentation with their responses prior to the start of all construction work.

2. According to the County policy, trenching shall not be permitted on any street that was rehabilitated within the last five years, unless a full width overlay is provided after trenching is completed. The City of Ventura should be made aware that the County section of Central Avenue from Santa Clara Avenue to Camarillo City-limits was last paved in 2017. Additionally, the following County roads are listed as Priority 1 in the County's Multi-Year Pavement Plant for completion in FY2019: Central Avenue from Rose Avenue to Santa Clara Avenue, Rose Avenue from Central Avenue to SR 118, and Santa Clara Avenue from Central Avenue to SR 118. The City of Ventura shall repair any damage to County roads due to trenching and the traffic generated by this project up to and including providing a new overlay as determined by the Transportation Department. The overlay shall be done in accordance with the County of Ventura, Public Works Agency, Road Standards, in particular plate E-11.

3. Prior to any work conducted within the County right-of-way, the developer/project proponent shall obtain an encroachment permit from the Transportation Department. This project will require an encroachment permit from the Transportation Department for work done within the road right-of-way as shown in the Proposed Project and Alternative Alignment B, Figure 1-2 and 1-3. The applicant shall contact (805) 654-2055 for the requirements of this permit.

4. If the project generates significant truck traffic on the County of Ventura Regional Road Network and local public roads, then the developer/project proponent should identify the proposed truck routes for the project. Furthermore, if county roads are anticipated to be used during construction, then a truck route plan/map should be submitted to the Transportation Department for review and approval.

5. The applicant should provide a Traffic Management Plan (TMP) to identify the construction-related vehicle route, especially for trucks, if there are any. The TMP should be submitted to Transportation Department for review and approval. If the applicant uses the County roads for truck and construction related trips, proper precautions shall be taken to protect all pavements, curb and gutter, sidewalks, and drainage structures from damage. Any portion damaged by the project's operations, in the opinion of the Transportation Department or designee, shall be replaced in accordance with current Standard Construction Details and/or in a manner acceptable to the Transportation Department or designee. Of particular interest are Central Avenue, Rose Avenue, Santa Clara Avenue, and Beardsley Road.

6. The proposed project would require construction in local roadways, including temporary closures of traffic lanes. Construction would cause driver inconvenience and could occur in proximity to homes and schools therefore, construction activity is recommended to take place during off-peak hours.

22A

22B

7. The Draft EIR and Final EIR should be sent to and reviewed by the other Cities in Ventura County that could be affected by this project, i.e. City of Oxnard and City of Camarillo.

8. The County of Ventura, Public Works Agency, Transportation Department would like to receive a copy of the Revised Draft EIR and Final EIR.

Our review is limited to the impacts this project may have on the County's Regional Road Network.

22C

Letter 22

COMMENTER: Anitha Balan, Ventura County Public Works Transportation Department

DATE: April 4, 2019

RESPONSE:

Response 22A

As described in Table 1-6 of the Draft EIR, the project would need an encroachment permit from the County of Ventura, which would include the relevant requirements.

Once design is finalized, the City (or the entity building the SWP Interconnection) would determine the need for encroachment permits from other jurisdictions (City of Oxnard and City of Camarillo).

Response 22B

The traffic and circulation study prepared for the SWP Interconnection identified one potentially significant impact related to construction traffic, the addition of peak hour trips to Central Avenue, a roadway that is currently operating at a less than acceptable level of service (see Draft EIR Section 2.16.3.2). To mitigate this impact, Mitigation Measure TR MM-1 includes limiting construction of Segment 10 (proposed alignment) and Segments 7 and 11 (Alternative Alignment B) to periods when Rio Mesa High School is out of session. This mitigation measure would reduce impacts to less than significant. Given the results of the traffic and circulation study and the applicable mitigation measures, limiting construction truck trips to outside peak hours is unnecessary.

Response 22C

The cities of Oxnard and Camarillo as well as the County of Ventura were provided Notice of Preparation of the EIR as well as Notice of Availability of the Draft EIR. The cities of Oxnard, Camarillo, and the County of Ventura will be included in the distribution of any notices related to the Final EIR (e.g., responses to comments, Notice of Determination).

PUBLIC
VENTURA COUNTY
WORKS

WATERSHED PROTECTION
WATERSHED PLANNING AND PERMITS DIVISION
800 South Victoria Avenue, Ventura, California 93009
Sergio Vargas, Deputy Director – (805) 650-4077

MEMORANDUM

DATE: April 3, 2019

TO: Anthony Ciuffetelli, RMA/Planning /EDR Coordinator

FROM: Sergio Vargas, Deputy Director For Sergio Vargas

SUBJECT: RMA18-005 State Water Interconnection Project
Draft Environmental Impact Report, Zone 2
Watershed Protection District Project Number: WC2018-0013

Pursuant to your request dated February 21, 2019, this office has reviewed the submitted materials and provides the following comments.

PROJECT LOCATION:

The pipeline would be approximately 7 miles in length originating in the southern portion of the City of Ventura (Henderson Road between South Saticoy Avenue and South Wells Road) and traversing southerly and easterly through unincorporated Ventura County to the southwestern end of the City of Camarillo (near the intersection of Camino Tierra Santa and Via Zamora).

PROJECT DESCRIPTION:

The project would enable delivery of State Water Project (SWP) water by wheeling water through the Metropolitan Water District of Southern California (MWD) and Calleguas Municipal Water District (Calleguas) water systems to the City of Ventura. The connection would also facilitate direct delivery of SWP water to United Water Conservation District (United) and direct or in-lieu of delivery of SWP water to Casitas Municipal Water District (Casitas). In addition, the interconnection would allow the City to deliver water to Calleguas during an outage of its imported water supplies. The interconnection would be a 36-inch pipeline used to transport water between Calleguas and the City's distribution systems.

WATERSHED PROTECTION DISTRICT COMMENTS:

Flood Control Facilities / Watercourses – Ventura County Watershed Protection District

1. The Public Draft EIR prepared by Kennedy/Jenks Consultants contains two project alignment alternatives (Figures 1-2 and 1-3) which propose to traverse a pipeline either parallel to or under several Ventura County Watershed Protection District (District) jurisdictional watercourses (redline channels) and facilities, often overlapping District rights of way. District facilities potentially impacted include: Santa Clara Diversion, Las Posas Estates Drain Diversion, Santa Clara River Levee (SCR-1), and Beardsley Channel. The Draft EIR does not provide analyses or mitigation of potential impacts to District facilities or right of way. Please provide site plans and cross sections for all proposed activities impacting District facilities, jurisdictional watercourses, and/or rights of way. All project components that would affect the District's facilities and rights of way are subject to District approval. 23A

2. Trenchless construction is proposed as a method for construction of the pipeline to cross beneath the Santa Clara River. The District owns and maintains the SCR-1 levee system along the east bank of the Santa Clara River. Construction of a pipeline below this feature would be required to ensure the levee would not be compromised or impacted. The District requests potential vibration-related impacts to District facilities resulting from horizontal directional drill (HDD) vibration (e.g., liquefaction) be addressed in the Final EIR. Trenchless construction is also proposed to cross below Beardsley Wash. This is an area of high groundwater and would likely prove difficult to cross beneath. The Final EIR should address the effects of dewatering on the District facilities and channels crossed by the project. 23B

3. An encroachment permit and annual utility use fees would be required if the project is approved and constructed. Please reference Ordinance WP-2 and the Resolution Establishing Policy for Permitting Underground Facilities in District Property, adopted by the Board of Supervisors on September 18, 1990. Crossing underneath the SCR-1 Levee would require both an encroachment permit from the Ventura County Watershed Protection District and a Section 408 permit from the U.S. Army Corps of Engineers (USACE) for modification to a federally-funded facility. Applying for a 408 permit from USACE must be coordinated through the District. Please update Table 1-6 listing potentially required permits, approvals, and consultations on page 1-28 of the Draft Public EIR to reflect these permits. In addition, any alignment that proposes the use of District property will be subject to District Resolution for permitting underground facilities establishing underground facility use fees. 23C

4. Pump stations and other above ground features would be included in the proposed projects. The final EIR should consider mitigation measures to address potential cumulative impacts due to potential increases in imperviousness. It is the District's policy that Projects shall not increase storm runoff in all frequencies of storm events consistent with WP-2 Ordinance. 23D

5. A detailed construction schedule is not discussed or provided with the Draft EIR. Section 1.11.1 of the Draft EIR assumes construction will last approximately 30 months and includes time for utility relocation, design, adjustments, submittals, pipe delivery, and start up. The District's Operations and Maintenance crews routinely service District facilities on both a scheduled and as needed basis. Projects that would utilize District facilities in any way would need to schedule work well in advance to construction to ensure the District's operations are not impacted. Further, if any maintenance were required to the pipeline within the operations phase, the District's Operations and Maintenance crews would need to be notified well in advance to ensure the District's operations are not impacted. 23E

Hydraulic Hazards - FEMA

6. The project site for both proposed alignments cross multiple locations identified by the Federal Emergency Management Agency (FEMA) as Special Flood Hazard Areas Zone AE including regulatory floodways. This is evidenced on Flood Insurance Rate Map (FIRM) Panel No. 06111C0926E and Panel No. 06111C0770E, effective January 20, 2010. A Floodplain Development Permit would be required from the Ventura County Public Works Agency prior to ground disturbance. Please update Table 1-6 listing potentially required permits, approvals, and consultations on page 1-28 of the Draft Public EIR to reflect this permit requirement. 23F

Biological Resources – Ventura County Watershed Protection District

7. Endangered southern steelhead (*Oncorhynchus mykiss*) are known to occur in the Santa Clara River. If drilling activities have a potential to effect surface water levels in the Santa Clara River (i.e. drawdown of groundwater from dewatering), avoidance measures to southern steelhead, such as temporal construction restrictions, should be discussed in the Final EIR. 23G

END OF TEXT

Letter 23

COMMENTER: Sergio Vargas, Deputy Director, Ventura County Public Works Watershed Projection

DATE: April 3, 2019

RESPONSE:

Response 23A

As documented in Table 1-6 of the Draft EIR, the City anticipates the need to obtain permits and other approvals from the Ventura County Watershed Protection District. As part of this process, the City (or the entity constructing the pipeline) would provide site plans and cross sections for pipeline segments traversing Watershed Protection District facilities, rights-of-way, and jurisdictional watercourses.

Response 23B

Horizontal Directional Drilling (HDD) is a rotary process, not an impact process. HDD utilizes a rotary bit on the end of drilling pipe string that is hydraulically rotated by the HDD machine at the entrance shaft. The entrance shaft could be located on either side of the Santa Clara River. However, it is anticipated that the north side of the river would serve as the location for the entrance shaft since only the south side of the river provides sufficient area to layout approximately 2,000' of pipe, which would be pulled back into the borehole from south to north.

During design, a geotechnical study would be conducted which characterizes the soil within the levee and identifies corresponding sensitivities to vibration. The engineer would then select a bore path which is well below the levee and minimizes potential impacts due to vibration. In addition, the City (or the entity constructing the pipeline) would implement the recommendations of the site-specific geotechnical report and any requirements of the Army Corps of Engineers Section 408 Permit.

Also, during design, a geotechnical study would be conducted which characterizes the soil conditions near Beardsley Wash. Using this information, the design engineer would identify appropriate construction methods for crossing Beardsley Wash. In addition, the City (or the entity constructing the pipeline) would implement the recommendations of the site-specific geotechnical report, the requirements of the Ventura County Watershed Protection District Encroachment Permit, and any requirements of the NPDES Permit for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties (General NPDES Permit No CAG994004).

Response 23C

Table 1-6 of the EIR has been updated to include an encroachment permit from the Watershed Protection District and a Section 408 Permit from the Army Corps of Engineers. See Section 1.3 of this Final EIR.

Response 23D

The only significant aboveground structure that could increase imperviousness is the proposed blending station which would be built within the City of Ventura and follow City of Ventura requirements for stormwater management.

Response 23E

Consistent with terms of the encroachment permit, the Watershed Protection District will be notified before construction commences within District property/facilities. Requirements for scheduling and performing maintenance will be memorialized in project encroachment permit(s).

Response 23F

Table 1-6 of the EIR has been updated to include a Floodplain Development Permit from the Watershed Protection District. See Section 1.3 of this Final EIR.

Response 23G

The HDD pipeline crossing of the Santa Clara River is not anticipated to affect surface water volumes. In any case, the subject reach of the Santa Clara River is a migration corridor for steelhead (during high flows only) but does not provide any suitable spawning or rearing habitat. Therefore; steelhead are not likely to be present when pipeline installation occurs.

2 April 2019

City of Ventura, Ventura Water
501 Poli Street
Ventura, CA 93002-0099

Attn: Betsy Cooper

Re: Economic & Social Impacts of Ventura's Water Projects, specifically comments due April 5, 2019 on the Draft EIR for the State Water Interconnection Project

The City of Ventura has acknowledged that the cost of water will increase markedly due to the implementation of Ventura's Water Projects, including the State Water Interconnection Project. At public meetings residents have been told that the city will take water from the State Interconnection in-lieu of drawing from Lake Casitas and that state water will be more expensive. No official estimated cost of these projects to consumers has been offered.

It is known by the city that one of the most disadvantaged areas in the City of Ventura is found on the west side of our city. Today these residents are eligible to receive water from Lake Casitas at a lower cost than the cost of state water. If the city pursues the 'in-lieu' project to deliver state water to all residents of the city rather than permitting the west end of the community to continue to take from Casitas, this project will have a real economic & social impact on many of our residents who currently live paycheck to paycheck or on a fixed income. We are already dealing with significant increases in the cost of living in Ventura. This project imposes additional cost burdens that, cumulatively, may force residents and businesses from a historic part of our community.

> "A portion of Ventura Water customers receive water from Casitas. **In-lieu delivery means that the SWP water would be delivered to a Ventura Water customer in the Casitas service area**, rather than directly delivered to Casitas, and this would offset demand on the Casitas system." (p. 1-1 footnote)

This in-lieu delivery from the project assists Casitas with water supply management, but also increases the cost of water for a segment of Ventura's population in the west end least able to bear the additional cost. If Casitas took the water directly, to arrive at real cost it would average the cost of its normal supply with the volume attributable to state water, keeping prices lower for its customers.

I see on p. 3-2 (p. 196 of the PDF) of the Draft EIR that the economic impact of the project from the growth-inducing perspective is considered, but see nowhere in the Draft where the economic & social impact of the increased cost of water from this project on vulnerable populations & small businesses is analyzed.

The case cited in Section 14, 15131. Economic and Social Effects analyzed the economic & social impacts on the community of a project that impacted businesses & consumers. It may apply to Ventura's Water Projects since the economic & social impacts are not minimal for all residents and may be a factor in residents or businesses leaving the area, leading to a physical change in a sensitive part of our city.

"In *Citizens Association for Sensible Development of Bishop Area v. Inyo* (1985) 172 Cal. App. 3d 151, the court held that "economic or social change may be used to determine that a physical change shall be regarded as a significant effect of the environment. Where a physical change is

caused by economic or social effects of a project, the physical change may be regarded as a significant effect in the same manner as any other physical change resulting from the project. Alternatively, economic and social effects of a physical change may be used to determine that the physical change is a significant effect on the environment." In this case, the Court held that an EIR for a proposed shopping center located away from the downtown shopping area must discuss the potential economic and social consequences of the project, if the proposed center would take business away from the downtown and thereby cause business closures and eventual physical deterioration of the downtown."

We will not know if the impact of the project on vulnerable populations & businesses is less than significant without an analysis of this impact. For this reason I would argue that the analysis should be included in the Draft EIR. Without this analysis Ventura is left in the dark as to this project's impact on our most at-risk residents & businesses.

Thank you for considering these comments.

Sincerely,

Kathy Bremer
450 Dorothy Ave.
Ventura, CA 93003

Letter 24

COMMENTER: Kathy Bremer

DATE: April 2, 2019

RESPONSE:

Response to Letter 24

When social or economic effects would have physical impacts on the environment, CEQA requires analysis of the physical impacts. The Draft EIR addresses all anticipated physical impacts on the environment. Therefore, the Draft EIR complies with Section 15131(a), which states:

> Economic or social effects of a project shall not be treated as significant effects on the environment. An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes. The intermediate economic or social changes need not be analyzed in any detail greater than necessary to trace the chain of cause and effect. The focus of the analysis shall be on physical changes.

Commenter did not provide linkage between project cost and a physical change in the environment.

To: City of Ventura, Ventura Water
Betsy Cooper
501 Poli Street
Ventura, CA 93002-0099
bcooper@cityofventura.ca.gov

Subject: State Water Interconnection Project (SCH No. 2018031010) Draft Environmental Impact Report Review Comments

Pg 1-9 EIR states why the SWP interconnection project is needed:

"The City, Calleguas, United, and Casitas have the following needs:

- The City needs to provide a continued reliable water service to City water customers. This involves making up for losses in annual yield from existing supply sources (Lake Casitas, Ventura River, and groundwater), improving water quality, and providing an emergency/backup connection for Ventura Water's potential potable reuse project.
- Calleguas needs to improve its water supply reliability in the event of an outage of imported supplies.
- United needs to protect local supplies to ensure a long-term supply for its service area. This involves making up for losses in annual yield from existing supply sources (Santa Clara River diversions and groundwater), enhancing groundwater recharge options while reducing groundwater overdraft, improving basin groundwater quality, and providing an emergency connection for United's O-H Pipeline.
- Casitas needs to extend the ability of Lake Casitas to provide water during a long-term drought and to replace water that otherwise would have been diverted for storage at Lake Casitas but is now released downstream as required by the BO for the Robles Diversion Facility."

25A

Then the EIR states what the SWP interconnection project objectives are:
Project Objectives:

1. Provide near-term water supply for the City to enhance water supply reliability;
2. Improve City water quality;
3. Provide a back-up supply for the City's other potential, long-term water supply options;
4. Allow Casitas and United to receive their SWP entitlements; and
5. Enable the City to deliver to Calleguas during an imported water supply outage.

As a Ventura citizen and a Ventura Water ratepayer here are some observations and questions about the project objectives:

1. How does this project provide near-term water supply for the City to enhance our water supply when on page 1-6 of this report it says: "**The proposed State Water Interconnection Project is not anticipated to provide any increased water supply volume for the city,** and thus is not being considered in that [Ventura Water Supply Projects] EIR."

25B

This begs the question, if "the State Water Interconnection project is not anticipated to provide any increased water supply volume for the city" then why is the city justified in paying toward this very expensive project? Is it the best use of our water infrastructure funds?

2. The second project objective is to improve City water quality. The City water supply quality will be improved on the east-end of the city because if the City gets SWP water in-lieu of the Casitas water, then the Casitas water "service area" restrictions will not apply. This means that Ventura Water can blend the high total-dissolved-solids (TDS) Mound aquifer water with the SWP water. This will improve east-end water quality, but what will be the impacts to the Casitas service area customers' water quality? If the City is taking SWP water in wetter times in-lieu of Casitas water, does that mean that the Casitas water customers will be receiving SWP water blended with the highly mineralized Mound basin water from the east-end? Will it be improved or degraded when compared with Casitas water quality? Does the EIR address this impact – the potential for water users in the Casitas water service area to have a degraded water quality?

25C

Page 1-15 DEIR : "Unless appropriate measures are taken, mixing of waters from different sources with different water qualities can result in water quality issues. To minimize the risk of lead and iron release from the introduction of SWP water into the 430 zone, a blending station is proposed. At the blending station, the different water sources can be mixed and water treatment additives used to condition and stabilize the water before introduction to the City's water system."

25D

In the SWP interconnection project plan is the City signing over it Casitas water supply allocation completely? Or is it just not taking its Casitas supply until the city has repaid the "rented" water that was used out of the Casitas service area? Historically, Casitas has served the Westside, Downtown, some beach areas, and Midtown (to Mills Rd.). It should be noted that the Casitas water supply can "expand" to cover the **actual AF usage** in the service area. This means if in the future there is more demand in the Casitas service area that our Casitas allocation is increased to match the actual usage. If we are signing over our

25E

Casitas supply to use the “in-lieu” state water, then be aware we are potentially signing over a much larger future supply than we are currently using in the service area. Also note that SWP water may be much more costly than Casitas water, so for ratepayers this would be an important question: **Is the City is paying the Casitas AF water charge or the SWP water charge?** Additionally, these Casitas service area ratepayers in the City have paid into and become vested in the Casitas system over the years. Is it fair that these area water consumers must now change their water supply to a potentially more expensive and more degraded in quality supply with potentially less reliability? (In drought periods, state water is extremely unreliable with water deliveries sometimes as low as 5% of the actual allocation.)

25E

3. How can this project “provide a back-up supply for the City's other potential, long-term water supply options” when state water is historically unreliable when it there is a statewide drought sometimes only delivering a very small % of the needed water allocation? And also, as stated in the first project objective bullet: “ The proposed State Water Interconnection Project is not anticipated to provide any increased water supply volume for the city.” Additionally, what happens if Calleguas does not have the capacity in their system to wheel extra SWP water to the City of Ventura either now or in the future?

25F

Page 1-25 EIR: “Based on a hydraulic analysis performed, a 36-inch diameter pipeline could deliver as much as 18,800 AFY, if this volume of water was available. **However, the availability of water is limited.”**

Page 1-26 EIR: “To evaluate SWP supply availability under existing conditions, the 2017 DCR considers the impacts on SWP delivery capability due to climate change, sea level rise, and multiple Delta-specific concerns: the variability of Delta inflows seasonally and annually, the vulnerability of the Delta’ s conveyance system and structure due to floods and earthquakes, and water quality objectives that address Delta ecosystem health.”

” Consideration is also given to the major Delta policy planning efforts currently underway: The Delta Plan and the California WaterFix. With these factors, the 2017 DCR projects that under existing conditions (2017), the average annual delivery of Table A water is estimated at 62%.

“In a very dry year or in the event of infrastructure failure, it is possible there would be no SWP delivery.

25G

"Deliveries could also be impacted by capacity limitations in the MWD and Calleguas water transmission and treatment facilities **because wheeling agreements would be for excess capacity not being used by MWD and Calleguas customers**. More capacity would typically be available in the winter than in the summer"

25G

There are a lot of moving parts in this SWP interconnection proposal, and none of them seem to work to protect Ventura's water-user and ratepayer, but rather works to allow Casitas and United to receive their SWP entitlements. This project has obvious benefits for Casitas and United, and obvious benefits for Calleguas to be supplied City water in the event of an emergency, however the benefit to the city and its ratepayers is much more tenuous.

4. The project "allows Casitas and United to receive their SWP entitlements" which is great in that we should help our neighbors, however if these neighboring areas have had a tremendous amount of recent building, then, is it fair that Ventura takes on the burden of agencies which have **not** understood water availability is limiting factor to unrestricted development? Is it now fair for neighbors who have built without a vision for long-term sustainability to get to water from a neighbor who has taken great pains to conserve and extend their existing water supply?

25H

Additionally, the report accurately states that prior to emergency Ordinance E the City was relying on 25,000 AF of conservation credits we stored in the Oxnard Plain Basin to be used in water shortage years, however in 2014 because groundwater was being over-drafted from the basin our carefully saved and stored credits were eliminated. To stop seawater intrusion and to **achieve compliance with the 2014 Sustainable Groundwater Management Act (SGMA), basin pumping may be reduced as much as 39% more**. This certainly makes one question if the city should not be looking into **improving water storage infrastructure** to save our own water in wet times for use in dry times. How much would city owned, run, and, most importantly, controlled water-storage facilities cost compared to Ventura's share of this extremely expensive pipeline project? Ventura needs to look at alternative water storage and purple-pipe projects that could conserve and extend our water supply in manners that we control.

25I

5. And finally, the project enables the City to deliver to Calleguas during an imported water supply outage (an earthquake or pipe break, etc). This means now, for the first time, water can be drawn from Ventura's supply to replenish Calleguas supply, the problem is that the City does not have sufficient storage, so the water is coming from Casitas and/or it will be depleting the amount of water available to Ventura water users. Is there a limit on how long Ventura supplies Calleguas with water in the event of an emergency? It may take months for repairs to be made after an emergency. The EIR notes that Calleguas is not selling SWP water to Ventura, Casitas and United water agencies, but is merely wheeling existing SWP entitlements through their system, as required by state

25J

law, to these agencies with existing SWP water entitlements. Calleguas is fairly compensated for doing this. How much does this wheeling fee increase the SWP water cost? This is a very expensive project that has very limited benefits for Ventura ratepayers, in fact, because if the City enters into this SWP interconnection deal the straw can go into Ventura's water supply and suck it out to be used by Calleguas -- this could actually have a detrimental effect on Ventura's long-term water supply reliability.

25J

Some other thoughts and questions about this SWP Interconnection EIR:

The San Buenaventura City Council Resolution No. 2014-057 dated **9/22/2014** established that "there is a direct nexus between the availability of water supply and the immediate preservation of the public health and safety"; and, resolved that "the ordinary demands and requirements of the water consumers served by the City of San Buenaventura cannot be met by the water supplies **now** available to the City without depleting the water supply or diminishing its quality to the extent that there would be insufficient water for human consumption".

Have the City's water supply circumstances change since this 9/22/2014 resolution? That is, have the water conservation incentives of the water shortage contingency plan significantly reduced the water demand of the City's water consumers? Have these demand-side conservation efforts, a wetter 2019, and loss of over 500 homes in the Dec. 4, 2017 Thomas Fire (some of which may not be rebuilt) changed the current water supply equation?

Page 1-5 EIR: "In 2017, the City's total water demand was 13,973 AFY, with a five-year average since 2013 of 15,429 AFY. Overall, per capita water demand has declined significantly since the middle of the last century due to effective water use efficiency practices, including plumbing code changes, improved water loss control, and an ongoing and active water use efficiency program. As a result, per capita water use decreased from an average of 277 gallons between 1940-1970 to 166 gallons in 2010. Additional conservation efforts during the most recent drought resulted in even further **declines to 117 gallons per capita per day (GPCD) in 2015.** Nevertheless, water use is projected to increase to between 19,000 to 21,500 AFY by 2030 and potentially up to 22,700 AFY by 2040."

25K

The last sentence above is projecting water use increases, **the basis for these projections are not given**. With future water-saving technological advances and increased conservation and an increased use of recycled water the question becomes: **Is this project needed for the City of Ventura's long-term water supply?** Ventura water users have patriotically found ways to conserve water, if we can make better use of our city controlled recycled water (particularly in the near-term using more non-potable recycled water for landscape irrigation) then we may not need such an expensive SWP interconnection pipeline. Remember, except for a few wet years our area has basically been in drought since 2000. Remember, too, that Lake Casitas can refill completely with one very wet year. And, remember when there is a statewide drought the SWP water deliveries can be reduced to almost nothing.

The state water allocation of 10,000 AFY (that the City's water department has paid for the "rights" but has not taken delivery of , or paid for, actual wet water) is a current contract set to end in 2035 with an extension possible through 2085. Does the EIR consider that the extension of water contract may be significantly more expensive (especially with potential state water tunnel projects) than the current contract? Is it fiscally responsible for the City to obligate Ventura ratepayers to pay for such an expensive SWP interconnection project, without knowing what the SWP 2035 extension contract will cost ?

25L

If the City is pursuing a recycled water plant, is an expensive SWP interconnection pipeline truly necessary? As an alternative to this project, has the cost of implementing a citywide purple-pipe water system for ***non-potable*** treated water been considered? ***As direct potable reuse of recycled water is not yet approved by the state, making the best use of our non-potable recycled water is imperative***. If, as studies show, a large percentage of our water supply is used for landscaping -- then doesn't it make sense to compare the cost of this new SWP pipeline project with the cost to the city to build a purple-pipe water system to bring non-potable recycled water to all areas of the city? The addition of non-potable water tanks on our hillsides could aid out emergency preparedness by providing hillside homeowners with landscape water and greatly extending our fire-fighting capabilities. The City should consider as an alternative to this expensive SWP project, the cost of implementing a citywide non-potable purple-pipe system including many more hillside water tanks and examine other water storage projects that the city would have more control over than the availability of state water in statewide drought periods.

25M

Importantly, if Ventura is planning to take SWP water when it is available, it will need a reliable storage plan to keep the water safe and available until it is needed. The fact that thousands of AF of our "banked" water in the Oxnard Plain Aquifer was eliminated with the stroke of a pen when it was found the aquifer was being massively overdrawn, should be a cautionary tale. Where is this reliable storage for "taking state water when it is available" to help Ventura drought-proof our water supply? With this SWP plan, is Lake Casitas acting as the City's storage? Lake Casitas has a finite storage limit. Lake Casitas can still be severely compromised in a multi-year drought. Ventura's Casitas service area AFY usage is not so big that by the City not taking its allocation (and instead taking SWP water) that this will prevent the Lake from drying up in a multi-year drought. This means that this SWP project will not drought-proof Ventura's water supply anymore then our existing reliance on our Casitas allocation does.

25N

The one thing this project will do is legally allow us to use Casitas/SWP replacement water to blend with the high TDS water of the Mound aquifer to raise the water quality for east-end users, but this “gain” is tempered by the fact that Casitas service area customers will likely suffer degraded water quality and the SWP project is very expensive for very limited gains for Ventura ratepayers. With better use of our non-potable recycled water and better storage infrastructure we should be able to do far more to drought proof our local water supply. For far less money.

25O

Does this EIR sufficiently address the *economic and physical impacts* of storing our water and then transporting this water to the city for usage?

25P

What is the current AF cost of Casitas water and what is the future projected AF cost of state water? What is the potential increase if the new state water contract is significantly higher than our current contract? Are these economic impacts being considered?

It is the opinion of many that the subject EIR fails to comply with Title 14. California Code of Regulations, Chapter 3 Guidelines for Implementation of the California Environmental Quality Act, Article 9 Contents of Environmental Impact Reports. Section 15120 -15131 by not addressing the social and economic impact of adopting or not adopting the estimated $150M proposed project?

It is imperative that the expected economic impacts of the project options on water rates and property taxes are considered. It is also imperative that the impacts to economically disadvantaged persons, and/or elderly or disabled persons on fixed incomes are considered. In Ventura we have long wanted to allow our older citizens to "age in place." It is fiscally irresponsible if the City signs on to this expensive SWP project, that will have only very limited benefits for Ventura water ratepayers, without even knowing what the 2035 SWP extension contract might cost. We must know full social and economic impacts of this proposed SWP Interconnection project. This project could be growth inducing and it could feed a physical gentrification of the City causing irrevocable loses to the culturally and economically diverse city that Ventura has historically celebrated.

25Q

From EIR Page 3-1 Growth Inducing Impacts:

"CEQA Guidelines Section 15126.2(d) requires that an EIR evaluate the growth-inducing impacts of a proposed action.

Section 15126.2(d) calls for an EIR to: Discuss the way in which a proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth (a major expansion of a reclaimed water treatment plant might, for example, allow for more construction in service areas). Increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. Also discuss the characteristic of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment. In general terms, a project could foster spatial, economic, or population growth in a geographic area, if it meets any one of the following criteria:

- Removes an impediment to growth (e.g., establishment of an essential public service and provision of new access to an area);
- Fosters economic expansion or growth (e.g., changes in revenue base and employment expansion);

25R

- Fosters population growth (e.g., construction of additional housing or employment generating land uses), either directly or indirectly;
- Establishes a precedent-setting action (e.g., an innovation, a change in zoning and general plan amendment approval); or
- Develops or encroaches on an isolated or adjacent area of open space (distinct from an in-fill project).

Should a project meet any one of the above-listed criteria, it could be considered growth inducing. The project's potential growth-inducing impacts are evaluated below relative to these criteria. "

25R

If we saddle Ventura water ratepayers with the enormous costs, known and unknown, related to this SWP Interconnection pipeline it will be growth inducing because we will need truck loads of new construction fund money to help alleviate the higher capital improvement and water rate costs. The interconnection pipeline is growth inducing because by it allows the City the easy access, that it never before had, to SWP water deliveries.

Where it is clearly stated on page 1-6 and throughout this EIR document that: "**The proposed State Water Interconnection Project is not anticipated to provide any increased water supply volume for the city,** and thus is not being considered in that [Ventura Water Supply Projects] EIR."

And yet under the heading, "**Why the project is needed"** it states the City's reasons:

"The City needs to provide a continued reliable water service to City water customers. This involves making up for losses in annual yield from existing supply sources (Lake Casitas, Ventura River, and groundwater), improving water quality, and providing an emergency/backup connection for Ventura Water's potential potable reuse project."

25S

The reality is that although this project in the short term will not supply any increased water volume for the City it does check the box for "providing an emergency?back-up connection for Ventura Water's ***potential*** potable reuse project." and because of this and because the interconnection pipeline allows the City easy access to SWP water the pipeline project, by its very existence, will be growth inducing and will have social and economic impacts to the City and its citizens way beyond those examined in this EIR document.

Putting aside all of the growth inducing impacts and all of the potential impacts to city services, traffic and air quality, this is without doubt a lot of money to be spent on an emergency back-up for a *potential potable reuse project.* The state has not approved ***direct potable reuse*** projects because at this point in our water cleaning technology certain pharmaceuticals and viruses may still be present. Indirect potable reuse projects are approved. An indirect potable reuse project means sewage wastewater is cleaned to tertiary standards then injected into and aquifer and pumped back out for treatment and potable use. Ventura's problem is the Mound Aquifer which we control, is highly mineralized with high TDS levels so pumping cleaned wastewater into the aquifer means

25T

it will come out with higher TDS levels. HOWEVER, we can do this indirect potable reuse **process now** without needing an emergency back-up connection to the SWP. So if the state does not approve direct potable re-use, we will not need this costly SWP interconnection emergency/back-up with all of its potential drawbacks. For the City of Ventura, signing on to this project may be ***premature.***

25T

The purpose of this EIR is to serve as an informational document that to inform public agency decision-makers and the public generally of the significant environmental effects of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project. Without being able to know the costs associated with the 2035 SWP contract extension **or** whether the City potential direct potable reuse project will get state approval **or** how this project will impact our lower economic families and fixed income seniors through higher property taxes, rents and utility payments or the growth-inducing city-gentrifying effects of the City physically establishing a SWP interconnection pipeline City leaders should not move forward, The City as Lead Agency under CEQA should understand that this EIR leaves vital social and economic impacts unexamined. This SWP project EIR must address, *as required by law*, all of the social and economic impacts, including the growth-inducing impacts of adopting or not adopting the proposed project.

25U

Respectfully submitted for the public record,
Diane Underhill
1585 E. Thompson Blvd.
Ventura, CA 93001 805.643.1065

Letter 25

COMMENTER: Diane Underhill

DATE: April 5, 2019

RESPONSE:

Response 25A

This is a summary of text in the Draft EIR and no response is needed.

Response 25B

As described in Section 1.2 and Section 1.6, the City is seeking to make up for losses in annual yield from Lake Casitas, the Ventura River, and groundwater. The City already has a SWP entitlement with associated costs and this project would allow the City to use SWP water to compensate for lost supplies but would not result in the City having a greater annual volume of supply than it has historically had.

Response 25C

A discussion on water quality has been added, see Section 1.3 of this Final EIR.

Water quality in the Casitas service area of the City of Ventura is dependent on the source(s) available and utilized and this varies dependent on the amount of Ventura River water, Casitas water, and groundwater available. For example, if Lake Casitas and Ventura River sources are less available in a given year, it is likely that customers in the Casitas service area would receive a larger ratio of groundwater. The exact water quality that would be received is speculative, but the proposed project would deliver water that meets all primary water supply standards and would improve TDS, reduce water hardness, and reduce sulfate in the groundwater with which it is blended.

Response 25D

This is a summary of text in the Draft EIR and no response is needed.

Response 25E

The City receives water from Lake Casitas consistent with a Water Services Agreement between the City and Casitas. Casitas' supply to the City is generally limited to the demand within the Casitas service area and is subject to Casitas' Water Efficiency and Allocation Program. The City's annual supply from Lake Casitas is the lesser of (a) demand in that City service area that is also within the Casitas service area, and/or (b) water available from Lake Casitas as determined by the Water Efficiency and Allocation Program.

The City does not contemplate forfeiting its Lake Casitas supply; rather, water received would make up for lost supplies, including decreased supplies from Lake Casitas. As an example, in its 2013 Comprehensive Water Report, the City estimated it could reasonably receive 5,000

AFY from Lake Casitas, but, in 2018, given the implementation of Casitas' Water Efficiency and Allocation Program, the City estimated it would receive only 3,204 AFY from Lake Casitas.

The reference to "renting" and "repaying" water appears to stem from a misinterpretation of the concept of in-lieu water. Each year the City of Ventura would estimate the demand from the Ventura Water customers in the Casitas service area. Consistent with the Water Services Agreement and any cutbacks mandated by the Water Efficiency and Allocation Program, the City would request this water from Casitas. Upon this request, once SWP water is available, Casitas can ask the City of Ventura to take Casitas' available SWP allocation instead (in-lieu) of Casitas water, which would allow a like increment of water to remain in Lake Casitas. Neither Ventura nor Casitas is forfeiting their Lake Casitas water or SWP water through this arrangement. Though Ventura Water would take delivery of SWP water in-lieu of Lake Casitas water, the cost of conveying the SWP water would be the responsibility of Casitas which will be further defined in future agency agreements.

The commenter has concerns that, with the project, City ratepayers would (1) get an expensive project with (2) lesser water quality and with (3) less reliability.

1. When social or economic effects would have physical impacts on the environment, CEQA requires analysis of the physical impacts. The Draft EIR addresses all anticipated physical impacts on the environment. Therefore, the Draft EIR complies with Section 15131(a), which states:

   > Economic or social effects of a project shall not be treated as significant effects on the environment. An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes. The intermediate economic or social changes need not be analyzed in any detail greater than necessary to trace the chain of cause and effect. The focus of the analysis shall be on physical changes.

   Commenter did not provide linkage between project cost and a physical change in the environment.

2. The SWP supply is not of low quality. The SWP water that would be received would have first been treated at the Jensen Water Filtration Plant and meets all primary (health) and secondary (aesthetic) water standards. As discussed as part of the project objectives, the introduction of SWP water is expected to reduce the total dissolved solids (TDS) in City water. The Mound Basin is highly mineralized, both active City wells in the Mound Basin have elevated TDS concentrations, measured as high as 1,500 milligrams per liter (mg/L) and 2,100 mg/L in 2015 (United 2017a). These levels exceed the California Division of Drinking Water quality objective of 1,200 mg/L and therefore require blending to make the water suitable for potable use. A discussion on water quality was also added as part of Section 1.3 of the Final EIR.
3. The reliability of the SWP supply is described in the Draft EIR (Section 1.12.1). As discussed in that section, over the long-term, the SWP is anticipated to deliver 62% of each contractor's Table A amount, but in a very dry year or in the event of infrastructure failure, the SWP may deliver no water.

Response 25F

The commenter is concerned that SWP water cannot provide a back-up supply because (1) SWP water is historically unreliable when there is drought, because (2) it does not increase the overall volume of water available to the City in a given year, and (3) due to capacity limitations in the Calleguas system.

1. The reliability of the SWP supply is described in the Draft EIR (Section 1.12.1). As discussed in that section, over the long-term, the SWP is anticipated to deliver 62% of each contractor's Table A amount, but, in a very dry year or in the event of infrastructure failure, the SWP may deliver no water. However, a drought in the Ventura area does not necessarily mean a drought for the SWP. From 2012 to 2018 the City of Ventura was considered to be in drought (based on the USDA Drought Monitor (https://droughtmonitor.unl.edu/Maps/MapArchive.aspx). In 2017, the area supplying the SWP was not considered to be in drought and delivered 85 percent of Table A allocations.
2. As described in Section 1.2 and Section 1.6 of the Draft EIR, the City is seeking to make up for losses in annual yield from Lake Casitas, the Ventura River, and groundwater. SWP water would compensate for these lost supplies, but would not result in the City having a greater annual volume of supply than it has historically had. This does not mean SWP water cannot be used as one of the backup supplies.
3. As discussed in the Draft EIR, SWP deliveries could also be impacted by capacity limitations in the MWD and Calleguas water transmission and treatment facilities because wheeling agreements would be for excess capacity not being used by MWD and Calleguas customers. More capacity would typically be available in the winter than in the summer. As part of the SWP Alignment Study (one of the Draft EIR references), the Calleguas system hydraulic model was run and it's estimated that Calleguas would have sufficient capacity to deliver up to 18,800 AFY if the SWP Interconnection is a 36" diameter pipeline.

Response 25G

This is a summary of text in the Draft EIR and no response is needed.

Response 25H

As the City of Ventura examines the SWP Interconnection and weighs its advantages and disadvantages, one of the items included in that analysis is the environmental impacts of the project, which is the topic of the Draft EIR. The benefits to the City, as discussed in Section 1.7 of the Draft EIR are:

- A near-term water supply source for the City to enhance supply reliability and make up for lost supplies;
- Improvement of City water quality;
- Provision of a backup supply for the City's other potential, long-term water supply options.

Response 25I

The alternatives recommended by the commenter, increased local storage and recycled water, do not meet the project objectives. Specifically, none of these options individually or in combination would allow Casitas or United to receive their SWP entitlements or enable the City to deliver water to Calleguas during an imported water outage.

Response 25J

Text has been added to the EIR project description to clarify under what conditions Calleguas could receive water from the SWP Interconnection. See Section 1.3 of this Final EIR. In addition, Section 2.9.3.2 of the Draft EIR states that, "If the City provides water to Calleguas during an outage of imported supplies, Calleguas would provide a like quantity of water back to Ventura after the outage is over."

Response 25K

As noted by the commenter, the City is implementing conservation measures. But even with conservation, supplemental water may be needed. As documented in the Draft EIR Section 1.2 (as well as the Ventura Water 2018 Comprehensive Water Resources Report and Ventura Water 2015 Urban Water Management Plan), even with projected conservation water demands are projected to increase. The alternative recommended by the commenter, conservation, does not meet the project objectives. Specifically, conservation would not: improve the City's water supply reliability; improve water quality; allow Casitas or United to receive their SWP entitlements; or enable the City to deliver water to Calleguas during an imported water outage.

Response 25L

See Response to 25E.

Response 25M

In an EIR the Lead Agency is obligated to analyze alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant environmental effects of the project. The alternative recommended by the commenter, city-wide use of recycled water and storing it in tanks, does not meet the project objectives. Specifically, city-wide recycled water does not improve water supply reliability, allow Casitas or United to receive their SWP entitlements, or enable the City to deliver water to Calleguas during an imported water outage.

More specifically, the average monthly demand of urban irrigation reuse customers within the service area is 1.3 MGD. Currently, less than 0.5 MGD is made available to customers that can take the water from a distribution facility located at the Ventura Water Reclamation Facility (VWRF). The urban irrigation market is small and serving additional customers would involve construction of an extensive piping network to deliver recycled water to numerous very small users dispersed throughout the City. Conveying recycled water from the VWRF to these numerous customers would be an inefficient means of distributing a small quantity of the total tertiary treated discharge and would offset only a small portion of the potable demands. Therefore, this alternative would not feasibly meet most project objectives.

Response 25N

The City does not intend to take and store extra available SWP allocation that is not required to make up for losses in annual supply. The City would use available SWP water conjunctively with its other water supply sources.

Response 25O

Refer to Response 25C.

Response 25P

The Draft EIR does evaluate physical impacts from the proposed project. In Section 2.6.3.3, the EIR describes SWP operations under the No Project Alternative. Without the proposed project, the SWP Allocations for the City of Ventura and Casitas would continue to be sold to other SWP contractors or to the DWR Turnback Pool Program. Review of the SWP management records (2007-2016) shows that the majority of water sold to the Turnback Pool Program is purchased by Southern California entities (MWD, Antelope Valley-East Kern Water Agency, Desert Water Agency, San Gorgonio Water Agency, Coachella Water District) or Southern San Joaquin Valley entities (Kern County Water Agency, Tulare Lake Basin Water Storage District). From 2007-1016, 80 to 90 percent of all water in the Turnback Pool Program was sent to either Southern California or the Southern San Joaquin Valley, which requires a similar amount of energy as delivering the water to Ventura and Casitas.

See also, response to comment 25E.

Response 25Q

Gentrification is a concern in any urban area with a desirable quality of life. The City of Ventura General Plan, and specifically the Housing Element, sets programs and initiatives for providing housing at affordable rates. The Housing Element contains housing programs for preserving existing housing, assisting homebuyers, rehabilitating rental units, and facilitating the development of second units and non-traditional housing. These efforts are geared toward ensuring that housing for all income categories can be found within the City of Ventura.

See also, response to comment 25E and 25S.

Response 25R

This is a summary of text in the Draft EIR and no response is needed.

Response 25S

As described in Section 1.2 and Section 1.6, the proposed project would make up for losses in annual yield from Lake Casitas, the Ventura River, and groundwater. The SWP, a regional water supply source, would compensate for these lost local supplies but would not result in the City having a greater annual volume of supply than it has historically had. Because the proposed project is making up for local supplies, it is not growth inducing; because the proposed project provides a different, regional, supply, it enhances water supply reliability.

The purpose of the proposed project is to make it possible to:

- Deliver SWP water to the City of Ventura to offset losses in existing water supplies.
- Make in-lieu deliveries to Casitas to offset losses in existing water supplies.
- Provide the infrastructure so that United can take direct delivery of its SWP water to offset decreases in groundwater replenishment and provide an emergency connection for the O-H system.
- Provide water supplies to Calleguas during an outage of imported water.

The project would not create a new water demand, nor provide capacity to meet projected future water demands. As stated in CEQA Guidelines Section 15126.2(d), "indirect" growth inducement can include "reducing obstacles to population growth," such as water supply. Growth inducement may result in adverse impacts if the growth is not consistent with local land use plans and growth management plans and policies for the area; this "disorderly" growth could indirectly result in additional adverse environmental impacts. The City's adopted General Plan guides the type, location, and level of land use and development planned for the City. The environmental impacts of this growth were addressed in the City of Ventura 2005 General Plan Final Environmental Impact Report (General Plan Final EIR). Because the proposed project will not promote growth beyond the growth permitted by the General Plan and evaluated by the General Plan Final EIR, the proposed project is not growth-inducing.

Response 25T

This comment misstates the project objectives and implies the only project objective is to provide a backup supply for the City's other potential, long-term water supply options. However the project objectives are to:

- Provide a near-term water supply source for the City to enhance supply reliability;
- Improve City water quality;
- Provide a backup supply for the City's other potential, long-term water supply options;
- Allow the City, Casitas and United to receive their SWP entitlements; and
- Enable the City to deliver water to Calleguas during an imported water supply outage.

The proposed project is needed with or without the proposed potable reuse project.

Response 25U

See Responses 25E, 25P, 25Q, 25S, and 25T.

We Serve Water

VENTURA RIVER
WATER DISTRICT

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April 5, 2019

City of Ventura, Ventura Water
Betsy Cooper
501 Poli Street
Ventura, CA 93002-0099

Subject: State Water Interconnection Project EIR

Dear Betsy:

The Ventura River Water District strongly supports the State Water Interconnection Project. It is essential with our changing climate to have as diversified water supply as possible.

California has experienced 50 year droughts in the past 1,000 years but Lake Casitas was only designed for a 20 year drought. The State Water Interconnection Project will provide another level of redundancy should a prolonged drought occur.

The most important characteristic of a reliable water system is diversification. Diversification is what the State Water Interconnection Project will provide for the City of Ventura and all of the Ojai Valley.

26A

Very Truly Yours
VENTURA RIVER WATER DISTRICT

Bert J. Rapp, P.E.
General Manager

Letter 26

COMMENTER: Bert J. Rapp, P.E., General Manager Ventura River Water District

DATE: April 5, 2019

RESPONSE:

Response 26A

Thank you for your comment.

Section 3: Mitigation Monitoring and Reporting Program

The City is the Lead Agency under CEQA. Calleguas will make decisions on the proposed project and is a Responsible Agency under CEQA. United and Casitas will make decisions about participating in the project based on the EIR and are also Responsible Agencies under CEQA. MWD may also use the EIR to inform future decisions, such as a wheeling agreement, and therefore is a Responsible Agency. Other agencies will rely on information in the EIR to inform their decisions over the issuance of specific permits related to project construction or operation.

After considering the environmental analysis provided for in the EIR and public comments on the EIR, the City and Calleguas will determine whether or not to approve the project.

This Mitigation Monitoring and Reporting Program (MMRP) has been prepared pursuant to CEQA and the State CEQA Guidelines to provide for monitoring of the mitigation measures required by certification of the project. Section 21081.6 of the Public Resources Code and Section 15091(d) of the CEQA Guidelines require public agencies to "adopt a reporting or monitoring program for changes to the project which it has adopted or made a condition of project approval in order to mitigate or avoid significant effects on the environment." The lead agency must define specific reporting and/or monitoring requirements to be enforced during project implementation prior to final approval of the project.

Mitigation measures have been developed to reduce or avoid potential environmental impacts associated with project construction and operation. The MMRP stipulates how all required mitigation measures are to be implemented and completed during the appropriate project phase. It also facilitates documentation necessary to verify that mitigation measures were in fact properly implemented.

A designated environmental monitor will track and document compliance with mitigation measures, note any problems that may result, and take appropriate action to remedy problems. The City and Calleguas, at their discretion, may delegate responsibility for implementation and monitoring, or portions thereof, to other responsible individuals, such as a licensed contractor. Specific responsibilities include:

- Coordination of all mitigation monitoring activities
- Management of the preparation, approval, and filing of monitoring or permit compliance reports
- Maintenance of records concerning the status of all approved mitigation measures
- Quality control assurance of field monitoring personnel
- Coordination with other agencies regarding compliance with mitigation or permit requirements
- Reviewing and recommending acceptance and certification of implementation documentation

- Acting as a contact for interested parties or surrounding property owners who wish to register concerns regarding environmental issues; verifying any such circumstances; and developing any necessary corrective actions

The MMRP is organized in a matrix format. The first column identifies the mitigation measure number. The second column identifies the mitigation measure. The third column, entitled “Time Frame for Implementation,” refers to when monitoring will occur. The timing for implementing mitigation measures and the definition of the approval process have been provided to assist City and/or Calleguas staff to plan for monitoring activities. The fourth column, entitled “Responsible Monitoring Agency,” refers to the agency responsible for ensuring that the mitigation measure is implemented. The fifth column, entitled “Verification of Compliance,” has subcolumns for initials, date, and remarks. This last column will be used to document the person who verified that the mitigation measure was satisfactorily implemented, the date on which this verification occurred, and any other notable remarks. The mitigation measures are presented by environmental issue area.

MITIGATION AND MONITORING REPORTING PLAN

Mitigation Measure	Source	Implementation Schedule	Responsible Party	Verification of Compliance		
				Initials	Date	Remarks
Biological Resources						
BIO MM-1: Least Bell's Vireo Surveys. Protocol surveys utilizing the January 19, 2001 Least Bell's Vireo Survey Guidelines (or equivalent approved by USFWS) shall be conducted in all suitable habitat within 500 feet of any proposed staging areas near the Santa Clara River to demonstrate absence of this species. If absence cannot be demonstrated to the satisfaction of the USFWS, least Bell's vireo avoidance measures (see below) shall be implemented. Least Bell's Vireo Avoidance Measures. If absence of this species cannot be demonstrated, all construction activity/pipeline installation work involving excavation, drilling and/or use of heavy equipment or heavy-duty trucks within 500 feet of the Santa Clara River at the proposed pipeline crossing site shall be conducted when least Bell's vireo is not breeding (August 1 through April 1).	Draft EIR Section 2.4	Prior to and during construction.	Construction Owner			
BIO MM-2: Breeding Migratory Bird Avoidance Measures. Vegetation removal and pipeline installation and related construction activity adjacent to tree windrows or native vegetation (portions of Segment 2 near Huntsinger Park and the Santa Clara River, portions of Segment 16 near the Las Posas Estates Drain, Segment 18 and Segment 19 along the blue gum windrow and native scrub vegetation, near the Saticoy Conditioning Facility) shall avoid the migratory bird and raptor breeding season (February 15 to August 15). • If construction in these areas cannot be avoided during this period, a nest survey within the area of impact and a 200 foot buffer for passerines and any available raptor nesting areas within 500 feet shall be conducted by a qualified biologist no more than 5 days prior to any native habitat removal or ground disturbance to determine if any nests are present. • If an active nest is discovered during the survey, a buffer of 200 feet for migratory birds or 500 feet for raptors (or as determined by the biologist based on a field assessment) would be established around the nest. No construction activity may occur within this buffer area until a biologist determines that the nest is abandoned or fledglings are adequately independent from the adults.	Draft EIR Section 2.4	Prior to and during construction.	Construction Owner			

Mitigation Measure	Source	Implementation Schedule	Responsible Party	Verification of Compliance		
				Initials	Date	Remarks
Cultural Resources						
CR MM-1: Prior to the issuance of the construction Notice to Proceed, the City and Calleguas shall each retain an archaeologist that meets the minimum professional qualifications standards (PQS) set forth by the Secretary of the Interior (SOI) to prepare a comprehensive Project Cultural Resources Management Plan (CRMP) for the portion of the project each agency is constructing. The purpose of the CRMPs is to document the actions and procedures to be followed to ensure avoidance or minimization of impacts to cultural resources consistent with CEQA Guidelines Section 15126.4(b). The CRMPs shall include at a minimum: • A description of the roles and responsibilities of cultural resources personnel (including Native American project manager, Native American representatives, and archaeologists), and the reporting relationships with project construction management, including lines of communication and notification procedures; • Description of how the monitoring shall occur; • Description of frequency of monitoring (e.g., full-time, part time, spot checking); • Description of what resources are expected to be encountered; • Description of circumstances that would result in the halting of work; • Description of procedures for halting work on the site and notification procedures; • Procedures for the appropriate treatment of human remains; • Description of potential procedures for the treatment of artifacts encountered during construction. Potential procedures may include leaving the artifact in place, preserving materials within another portion of the site, and/or collecting the artifact for analysis. Description of artifact collection, retention/disposal, and curation policies, including a statement that all cultural materials retained will be curated in accordance with the requirements of an identified, qualified curatorial facility, and that the agency responsible for constructing that portion of the Project shall be responsible for all expenses associated with the curation of the materials at the qualified curatorial facility; and • A description of monitoring reporting procedures including the requirement that reports resulting from the project be filed with the South Central Coastal Information Center (SCCIC) within one year of project completion.	Draft EIR Section 2.5	Prior to construction.	Construction Owner			

Mitigation Measure	Source	Implementation Schedule	Responsible Party	Verification of Compliance		
				Initials	Date	Remarks
CR MM-2: A worker cultural resources sensitivity program shall be implemented for the project. Prior to any ground-disturbing activity, the agency responsible for constructing that portion of the project shall provide an initial sensitivity training session to all project employees, contractors, subcontractors, and other workers prior to their involvement in any ground-disturbing activities, with subsequent training sessions to accommodate new personnel becoming involved in the project. The program may be conducted together with other environmental or safety awareness and education programs for the project, provided that the program elements pertaining to cultural resources are provided by a qualified archaeologist. The sensitivity program shall address: • The cultural sensitivity of the project site and how to identify these types of resources; • Specific procedures to be followed in the event of an inadvertent discovery; • Safety procedures when working with monitors; and, • Consequences in the event of noncompliance.	Draft EIR Section 2.5	Prior to construction.	Construction Owner			
CR MM-3: A qualified archaeologist and Native American representative shall monitor all excavation and trenching along the 2,400-foot ancillary pipeline along Telephone Road (within Segment 2) and Segments 18 and 19. The monitors shall have the authority to temporarily halt or redirect construction in the event that potentially significant cultural resources are encountered.	Draft EIR Section 2.5	During construction.	Construction Owner			
CR MM-4: For Segments 6, 10, 13, and 16, where open trench operations will occur, the agency constructing the project shall either perform: a. An Extended Phase I survey (including Shovel Test Probes) prior to construction with a Native American representative present, OR b. Monitoring by a qualified archaeologist and Native American representative. The level of monitoring will be determined in consultation with the qualified archaeologist and Native American project manager. At the request of the Native American project manager, if determined necessary to effectively monitor the scope and number of construction operations, an additional Native American representative shall be utilized for monitoring.	Draft EIR Section 2.5	Prior to and during construction.	Construction Owner			
CR MM-5: If the third potential blending/monitoring station site is selected, the footprint for the blending/monitoring station shall stay within the existing Saticoy Conditioning Facility and not extend more than ten feet into the Saticoy Regional Golf Course.	Draft EIR Section 2.5	During final design	City of Ventura			
CR MM-6: *If CR MM-5 is not feasible then the following becomes necessary.* Prior to the issuance of the construction Notice to Proceed, documentation and evaluation of the Saticoy Regional Golf Course shall be performed by a qualified architectural historian. The golf course opened in 1923 and was designed by George C. Thomas, Jr., a celebrated designer; thus, the golf course could be a historic property of local significance.	Draft EIR Section 2.5	Prior to construction.	Construction Owner			
CR MM-7: A qualified archaeologist and Native American representative shall monitor all project-related excavation and trenching within the Saticoy Regional Golf Course.	Draft EIR Section 2.5	During construction.	Construction Owner			

Mitigation Measure	Source	Implementation Schedule	Responsible Party	Verification of Compliance		
				Initials	Date	Remarks
CR MM-8: Prior to the issuance of the construction Notice to Proceed, Phase II subsurface testing and evaluation shall be performed for the portion of CA-VEN-223 to be impacted by Segment 18. The Phase II testing will consist of a combination of Test Excavation Units (TEUs) and Shovel Test Probes (STPs) and will determine the vertical and horizontal extent and composition of prehistoric deposits within Segment 18. A qualified archaeologist shall oversee the Phase II testing and a Native American representative shall monitor all excavation. a. If the portion of CA-VEN-223 within Segment 18 is determined to be significant after Phase II testing, project redesign or Phase III Data Recovery mitigation will be performed. b. If the portion of CA-VEN-223 within Segment 18 is determined <u>not</u> to be significant after Phase II testing, the project may proceed as planned with a qualified archaeologist and Native American representative monitoring all ground disturbance.	Draft EIR Section 2.5	Prior to construction.	Construction Owner			
***CR MM-9*:** If human remains are unearthed, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code Section 5097.98. The agency constructing that portion of the project shall be immediately notified of any human remains found. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the Native American Heritage Commission.	Draft EIR Section 2.5	During construction.	Construction Owner			
Geology and Soils						
GEO MM-1: Implement Recommendations of Site-Specific Geotechnical Report. For those areas where trenchless construction is planned, a site specific geotechnical report will be prepared by a qualified geotechnical engineer or engineering geologist. The report recommendations will be based on a comprehensive evaluation of slope stability, seismic, and soil conditions that may affect construction of the pipelines and related facilities.	Draft EIR Section 2.7	Prior to construction.	Construction Owner			
GEO MM-2: Grading and Excavation Monitoring by Qualified Personnel. As indicated by the Geotechnical Report and/or to the extent deemed appropriate by the agency constructing the pipeline, project grading and excavations shall be observed by a geotechnical engineer, engineering geologist, or other qualified representative to verify compliance with recommendations of the geotechnical report.	Draft EIR Section 2.7	During construction.	Construction Owner			
GEO MM-3: Incorporate Design Features to Prevent Failure in Seismic Event. The pipeline will be designed appropriately for an active seismic environment to limit the risk of pipeline failure due to a seismic event.	Draft EIR Section 2.7	Prior to and during construction.	Construction Owner			

Mitigation Measure	Source	Implementation Schedule	Responsible Party	Verification of Compliance		
				Initials	Date	Remarks
Hazards and Hazardous Materials						
***HZD MM-1*.** Prior to beginning HDD, the drilling contractor shall prepare a Frac-Out Contingency Plan. The Contingency Plan shall require: • Documenting and flagging any sensitive resources in and around entry and exit pits ○ If sensitive species are present in the active HDD area, a biological monitor will be provided during HDD activities • Installation of barriers between excavation areas and sensitive resources to prevent released materials from reaching sensitive resources • On-site briefings with workers to identify and locate sensitive resources at the site • Safety meetings to ensure that all field personnel understand their responsibility for timely reporting of frac-outs • Maintaining necessary response equipment on-site or at a readily accessible location and in good working order • Stoppage procedures should a frac-out be identified. • Isolation and clean up procedures (e.g., use of hay bales and vacuum trucks and revegetation) for frac-outs that occur on land • Isolation and clean up procedures (e.g., monitor for drilling mud congealment, erection of underwater booms and curtains and revegetation) for frac-outs that occur in water • Necessary consultations should frac-out occur (regulatory agencies, property owners, project owner)	Draft EIR Section 2.8	Prior to and during construction.	Construction Owner			
HZD MM-2. During design, oil and gas wells identified by DOGGR will be carefully mapped relative to the project alignment. If mapping indicates that the pipeline will be within 25 feet of a well, the following actions will be taken: 1. The project alignment will be modified within the identified construction corridor to ensure that a minimum 25 foot distance is maintained between the oil well and project facilities. 2. If measure 1 above is not possible, the agency constructing that portion of the pipeline will identify the well owner/responsible party and, per Public Resources Code Section 3208.1, ensure that the responsible party take the necessary actions to “re-abandon” the well to current DOGGR standards prior to construction.	Draft EIR Section 2.8	Prior to and during construction.	City of Ventura (design phase); Construction Owner (construction phase)			

Mitigation Measure	Source	Implementation Schedule	Responsible Party	Verification of Compliance		
				Initials	Date	Remarks
HAZ MM-3. Prior to starting construction, the Caltrans site will be carefully mapped relative to the construction area. This mapping will indicate if construction will enter the potentially contaminated area. Based on the mapping: • Suspect soils or suspect areas of concern will be tested using certified testing laboratories and techniques. • Should transportation and disposal of any contaminated soils be necessary, these activities will be performed in accordance with the law. • The contractor will be advised of the potential for hazardous materials to occur within the project area.	Draft EIR Section 2.8	Prior to and during construction.	City of Ventura (design phase); Construction Owner (construction phase)			
Noise and Vibration						
NS MM-1. A Nighttime Construction Noise Impact Reduction Program. A noise reduction program shall be implemented at the northern HDD pipeline installation site and all other pipeline installation sites where work is conducted between 7 p.m. and 7 a.m. within 1,000 feet of residential land uses and will consider the following measures. • Placement of portable noise barriers of up to 20 feet in height (minimum 15 dBA noise attenuation) between noise sources and residences. • Enclose or acoustically package all key power units, including the HDD power unit, Bore & Jack unit, and generators to reduce noise levels. • Enclose slurry separation plants, grout pumps and soil cement mixers to the extent feasible or place appropriate noise barriers around equipment to reduce noise levels. • Enclose or acoustically package light sets to reduce noise levels. • Place upgraded silencers on all applicable engines. • Temporarily disable equipment and truck back-up alarms and use signalers for all backup operations. • Minimize pipe handling operations and materials deliveries to the work site during evening and nighttime hours.	Draft EIR Section 2.12	During construction.	Construction Owner			
NS MM-1A. Limit pipeline installation within 300 feet of Rio Mesa High School to times when classes are not in session.	Draft EIR Section 2.12	During construction.	Construction Owner			
Transportation						
TR MM-1. Limit construction of Segment 10 (proposed project) and Segments 7 and 11 (Alternative Alignment B) to periods when Rio Mesa High School is out of session (generally mid-June to September). The existing congestion and delay on Central Avenue is due in large part by traffic generated by Rio Mesa High School. Performing construction when school is out of session will avoid the significant impact of combined school and construction traffic.	Draft EIR Section 2.16	During construction.	Construction Owner			