

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.



April 3, 2019

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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 its 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



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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 fact¹. 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

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

17A



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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.

B. Project Alternative
The City and County of Ventura and its various water users and purveyors should continue to explore augmenting local 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.

Reliability: 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.

17A

17B

17C



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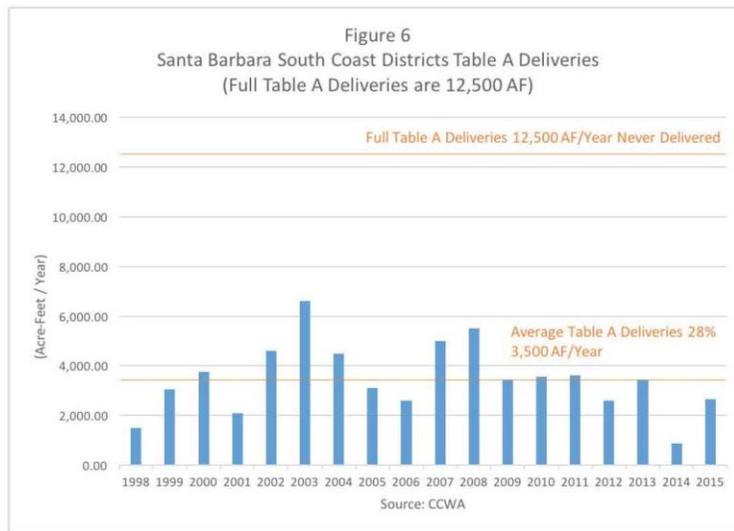
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Full Table A Allocations have never been delivered by the SWP and are unlikely to ever be delivered because of limited availability in times of drought and lack of need during wet years when the water is available. Since State water contractors are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



17C

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.

17D

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

17E



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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.

Santa Barbara's Lesson

The Santa Barbara Report⁴ 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/5c9fc4cf1837780001e3c10f/1553974534364/CWIN-SB_Report_FULLL.pdf

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



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	SWP Average	Worst year, 2014 SWP Drought	Avg. Cachu- ma	Avg. Groundwa- ter	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.

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.

Sincerely,

Carolee Krieger, C-WIN Executive Director

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17E

17F

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 Geronio 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 United 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.

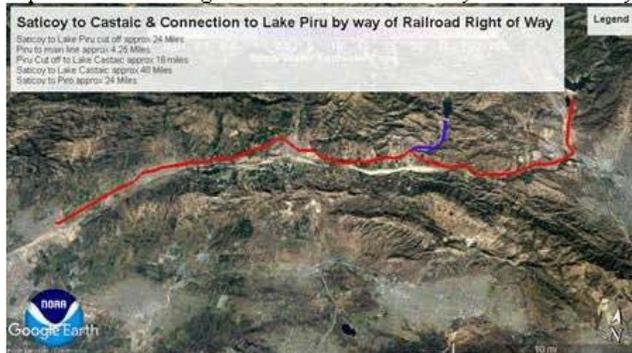
The information shows a conceptual design for pipelines presented by United Water, showing the potential alternate route and potential costs.

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



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

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

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**
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 Buena Ventura 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 Buena Ventura (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; Blackburn, 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

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](#).



Pursuant to the California Public Records Act, email messages retained by the County may constitute public records subject to disclosure.

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 *Anitha*

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%

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

District 8 TIMF per ADT = \$69.93

District 8 pipeline percentage = 54.9%

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

District 10 TIMF per ADT = \$55.63

District 10 pipeline percentage = 17.4%

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

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.

22A

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).



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 *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.
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.
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.

23A

23B

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.
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.

23D

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.”

25G

” 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 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.

25H

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?

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 than 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 losses to the culturally and economically diverse city that Ventura has historically celebrated.

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);

25Q

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).

25R

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. “

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:

25S

“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.”

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,
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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 Geronio 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, 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.

April 5, 2019



**VENTURA
RIVER
WATER DISTRICT**

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City of Ventura, Ventura Water
Betsy Cooper
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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.

Very Truly Yours
VENTURA RIVER WATER DISTRICT

Bert J. Rapp, P.E.
General Manager

26A

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						
<p>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.</p> <p><u>Least Bell's Vireo Avoidance Measures.</u> 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 <u>not</u> breeding (August 1 through April 1).</p>	Draft EIR Section 2.4	Prior to and during construction.	Construction Owner			
<p>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).</p> <ul style="list-style-type: none"> 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						
<p>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:</p> <ul style="list-style-type: none"> • 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
<p>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:</p> <ul style="list-style-type: none"> • 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			
<p>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.</p>	Draft EIR Section 2.5	During construction.	Construction Owner			
<p>CR MM-4: For Segments 6, 10, 13, and 16, where open trench operations will occur, the agency constructing the project shall either perform:</p> <ol style="list-style-type: none"> 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			
<p>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.</p>	Draft EIR Section 2.5	During final design	City of Ventura			
<p>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.</p>	Draft EIR Section 2.5	Prior to construction.	Construction Owner			
<p>CR MM-7: A qualified archaeologist and Native American representative shall monitor all project-related excavation and trenching within the Saticoy Regional Golf Course.</p>	Draft EIR Section 2.5	During construction.	Construction Owner			

Mitigation Measure	Source	Implementation Schedule	Responsible Party	Verification of Compliance		
				Initials	Date	Remarks
<p>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.</p> <p>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.</p> <p>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.</p>	Draft EIR Section 2.5	Prior to construction.	Construction Owner			
<p>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.</p>	Draft EIR Section 2.5	During construction.	Construction Owner			
Geology and Soils						
<p>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.</p>	Draft EIR Section 2.7	Prior to construction.	Construction Owner			
<p>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.</p>	Draft EIR Section 2.7	During construction.	Construction Owner			
<p>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.</p>	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						
<p>HZD MM-1. Prior to beginning HDD, the drilling contractor shall prepare a Frac-Out Contingency Plan. The Contingency Plan shall require:</p> <ul style="list-style-type: none"> • Documenting and flagging any sensitive resources in and around entry and exit pits <ul style="list-style-type: none"> ○ 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			
<p>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:</p> <ol style="list-style-type: none"> 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
<p>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:</p> <ul style="list-style-type: none"> • 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						
<p>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.</p> <ul style="list-style-type: none"> • 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			
<p>NS MM-1A. Limit pipeline installation within 300 feet of Rio Mesa High School to times when classes are not in session.</p>	Draft EIR Section 2.12	During construction.	Construction Owner			
Transportation						
<p>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.</p>	Draft EIR Section 2.16	During construction.	Construction Owner			

