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State Water Interconnection Project

Final Environmental Impact Report

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

July 25, 2019

Prepared for

City of San Buenaventura Ventura Water

336 Sanjon Road
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Section 1: Introduction to Final Environmental Impact Report

1.1 Introduction

The proposed project, the State Water Project (SWP) Interconnection, would enable delivery of SWP water by wheeling water through the Metropolitan Water District of Southern California (MWD) and Calleguas Municipal Water District (Calleguas) water systems to the City of Ventura. The pipeline facilities (the “interconnection”) would also facilitate direct delivery of SWP water to United Water Conservation District (United) and direct or in-lieu¹ delivery of SWP water to Casitas Municipal Water District (Casitas). In addition, the interconnection would allow the City to deliver water to Calleguas during an outage of Calleguas’ imported water supplies. The interconnection would be a pipeline used to transport water between Calleguas’ and the City’s distribution systems.

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

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

1.2 Contents of the Final EIR

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

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

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

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

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

1.3 Corrections and Additions to the Draft EIR

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

Table of Contents, List of Tables

Page xiii, the following tables are added:

[1-1a Calleguas Water Quality and Drinking Water Standards](#)

[1-1b Saticoy Water Conditioning Facility Treated Water Quality and Drinking Water Standards](#)

[1-1c Impact of Blending Ratio of Calleguas Water and Ventura Water](#)

Table of Contents, List of Acronyms

Pages xv-xvi, the following acronyms are added:

[ATE Associated Transportation Engineers](#)

[CEQA California Environmental Quality Act](#)

[CGP Construction General Permit](#)

[NAHC Native American Heritage Commission](#)

[RWQCB Regional Water Quality Control Board](#)

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

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

Page 1-6, the following text is removed:

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

Page 1-8 the following text is removed:

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

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

Section 1.7 Project Objectives

Page 1-9, the following changes are made:

The project would be designed to achieve the following objectives:

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

Project Components

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

1.9.6 Blended Water Quality

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

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

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

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

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

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

Table 1-1a cont.

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

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

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

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

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

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

Table 1-1b cont.

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

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

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

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

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

<u>Constituent</u>	<u>Units</u>	<u>Target Values</u>	<u>Blend Ratio (%SWP)</u>						
			<u>0% (Ventura Only)</u>	<u>10%</u>	<u>25%</u>	<u>50%</u>	<u>75%</u>	<u>90%</u>	<u>100% (Jensen WFP Water Only)</u>
<u>Temperature</u>	<u>°C</u>	<u>=</u>	<u>20.0</u>						<u>20.0</u>
<u>pH (Median)</u>	<u>S.U.</u>	<u>=</u>	<u>7.34</u>	<u>7.36</u>	<u>7.40</u>	<u>7.48</u>	<u>7.65</u>	<u>7.91</u>	<u>8.29</u>
<u>Total Dissolved Solids</u>	<u>mg/L</u>	<u>500-1000-1500</u>	<u>1242</u>	<u>1147</u>	<u>1005</u>	<u>769</u>	<u>532</u>	<u>391</u>	<u>296</u>
<u>Calcium</u>	<u>mg/L</u>	<u>=</u>	<u>202</u>	<u>184</u>	<u>158</u>	<u>113</u>	<u>68</u>	<u>42</u>	<u>24</u>
<u>Total Hardness as CaCO₃</u>	<u>mg/L</u>	<u>=</u>	<u>707</u>	<u>=</u>	<u>=</u>	<u>=</u>	<u>=</u>	<u>=</u>	<u>112</u>
<u>Total Alkalinity (as CaCO₃)</u>	<u>mg/L</u>	<u>=</u>	<u>275</u>	<u>256</u>	<u>228</u>	<u>180</u>	<u>133</u>	<u>104</u>	<u>85</u>
<u>Chloride</u>	<u>mg/L</u>	<u>250-500-600</u>	<u>68</u>	<u>69</u>	<u>71</u>	<u>74</u>	<u>76</u>	<u>78</u>	<u>79</u>
<u>Sulfate</u>	<u>mg/L</u>	<u>250-500-600</u>	<u>528</u>	<u>480</u>	<u>409</u>	<u>289</u>	<u>170</u>	<u>98</u>	<u>50</u>

Section 1.11

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

Good Construction Practices

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

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

Section 1.12.1

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

1.12.1 Annual Water Deliveries

Annual Water Deliveries

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

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

Agreement for Water Deliveries

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

Section 1.12.2

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

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

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

Section 1.13, Table 1-6

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

**TABLE 1-6
POTENTIALLY REQUIRED PERMITS, APPROVALS, AND CONSULTATIONS
Permits/Approvals Potentially Needed
to Implement the Project**

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

Section 2.3.1.1

Page 2-14 is amended as follows:

2.3.1.1 Climatological Setting

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

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

At the Oxnard Airport (6.3 miles to the south of the Ventura connection point), the maximum average monthly temperature is ~~73~~ 72.4 degrees Fahrenheit (°F) in August, and the minimum average monthly temperature is ~~46~~ 45.2°F in December and January. The average monthly maximum precipitation is ~~3.77~~ 2.68 inches in February, and the average monthly minimum is 0.054 inches in August, with an average annual precipitation of ~~40.39~~ 15.9 inches (~~1998-2008~~ 1981-2010 averages). At the Oxnard Airport, the average monthly wind speed varies from 2.6 mph in August to 4.5 mph in December. However, winter storms may bring short periods of much higher wind speeds. The typical wind direction is from the northwest and west. Onshore wind flow is prevalent, with a marine cloud layer causing heavy fog (visibility one-quarter mile or less) an average of 29.4 days per year.

Section 2.13.3.2 Project-Specific Impacts and Section 3.2.3 Population Growth

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

Page 2-122 is amended as follows:

Population Growth Impacts (Significance Threshold a - d)

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

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

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

Page 3-3 is amended as follows:

3.2.3 Population Growth

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

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

Section 2: Response to Comments

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

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

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

No.	Commenter	Date	Page
1	Scott McCarty, Ventura Water Commission	2/28/19	2-3
2	Duane Georgeson	3/4/19	2-5
3	Daniel Cormode	3/6/19	2-7
4	Stephen P. Henry, US Fish and Wildlife Service	3/12/19	2-11
5	Daniel Cormode	3/6/19	2-14
6	George Naugles	3/20/19	2-17
7	Gerhart Hubner, Ventura Water Commission	3/22/19	2-19
8	Suzanne McCombs, Ventura Water Commission	3/25/19	2-21
9	Burt Handy	4/1/19	2-23
10	Miya Edmonson, Caltrans	3/28/19	2-25
11	Burt Handy	3/27/19	2-28
12	Burt Handy	4/2/19	2-31
13	David Klotzle, City of Camarillo	4/2/19	2-33
14	Mark E. Hancock, Law Offices of Mark Hancock	4/2/19	2-39
15	James Kentosh, Vice President Mike Krumpschmidt, Director Meiners Oaks Water District	3/25/19	2-38
16	Steve DeGeorge, Ventura County Transportation Commission	4/4/19	2-42
17	Carolee Krieger, California Water Impact Network	4/3/19	2-44
18	Burt Handy	4/4/19	2-52
19	Daniel Cormode	4/5/19	2-55
20	Nicole Collazo, Ventura County Air Pollution Control District	4/1/19	2-57
21	Manjunath Venkat, Ventura County Resource Management Agency	4/4/19	2-60
22	Anitha Balan, Ventura County Public Works Transportation Department	4/4/19	2-63
23	Sergio Vargas, Deputy Director, Ventura County Public Works Watershed Protection	4/3/19	2-68

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

Lauren Everett

Subject: FW: Comments on SWP Draft EIR

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

Hi, Betsy,

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

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

} 1A
} 1B
} 1C

Thanks, Betsy.

Cheers,
Scott McCarty
Water Commission Member

Letter 1

COMMENTER: Scott McCarty, Ventura Water Commission

DATE: February 28, 2019

RESPONSE:

Response 1A

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

Response 1B

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

Response 1C

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

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

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

Lauren Everett

Subject: FW: SWP EIR- Water quality data

—Original Message—

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

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

Many thanks,
Duane Georgeson
Sent from my iPhone

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Letter 2

COMMENTER: Duane Georgeson

DATE: March 4, 2019

RESPONSE:

Response to Letter 2

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

06 March 2019

From: Daniel Cormode
186 Gorrion Ave
Ventura, CA 93004

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

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

1. The City of San Buenaventura has prepared a Notice of Availability to notify responsible and trustee agencies that an Environmental impact Report (EIR) for implementation of the State Water Interconnection Project (SWP) has been prepared and forwarded for review and comment.
2. The EIR is stated to be an "informational document based on facts"¹.
3. The project would enable delivery of State Water Project (SWP) water by wheeling water through the Metropolitan Water District of Southern California (MWD) and Calleguas Municipal Water District (Calleguas) water systems to the City of Ventura. The pipeline facilities (the "interconnection") would also facilitate direct delivery of SWP water to the United Water Conservation District (United) and direct or in-lieu delivery² of SWP to Casitas Municipal Water District (Casitas). In addition the interconnection would allow the City to deliver water to Calleguas during an outage of Calleguas imported water supplies. The interconnection would be a pipeline used to transport water between Calleguas and the City's distribution systems.
4. The pipeline would be approximately 7 miles in length or originating in the easterly portion of the City of Ventura and traversing southerly and easterly through unincorporated Ventura County to the southwestern part of the City of Camarillo.
5. The objective of the State Water Interconnection Project (SWP) is stated to: Provide a water supply source to the City to enhance supply reliability; Improve water quality; Allow Casitas and United to receive their State Water Project entitlement; and, Enable the City to deliver water to Calleguas during an imported water supply outage.³
6. A summary and description of the various capital improvement projects which are required as a prerequisite to implementing the capability to receive and distribute State Water in the City of

¹ Handout, Ventura Water State Water Interconnection Project, Public Meeting Review Draft Environmental Impact Report, Slide 3, February 26, 2019

² In-lieu delivery means that all the SWP would be delivered to a Ventura Water customer in the Casitas service area, rather than directly delivered to Casitas, and this would offset demand on the Casitas system. Notice of Availability, February 19, 2019.

³ Handout, Ventura Water State Water Interconnection Project, Public Meeting Review Draft Environmental Impact Report, Slide 6, February 26, 2019

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

3A

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

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

3A

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

Project No.	Project Description	CIP Description and Comment	FY2018-2024 CIP Cost Estimate
		system. Completion FY2022-2023.	
		Total	\$70,390,000

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

7. The following comments are provided regarding the adequacy and completeness of the subject EIR:

- a. The EIR is incomplete. The impact to the environment of the various capital improvement projects identified in Table 1 above which are required as a prerequisite to implementing the capability to receive and distribute State Water in the City of San Buenaventura from the interconnection pipeline are not identified or evaluated. During the public comment portion of the Ventura Water Commission hearing on the State Water Interconnection Project Draft Environmental Impact Report (EIR), an observation was made that the EIR for the proposed State Water Interconnection Project appeared to be incomplete since it only addressed construction of the pipeline and did not include associated additional water distribution system modifications required to transmit water from the Saticoy facility to west Ventura customers. Ventura Water staff's response was "Ventura Water currently has the capability to deliver water from east Ventura to west Ventura," therefore, proposed waterline and pump station improvements are not required as a prerequisite for delivering State Water from the Saticoy facility to west Ventura. If Ventura Water staff's response is correct, then what is the justification for the six unnecessary CIP projects totaling \$47,490,000?
- b. No factual or supporting data is provided to support the conclusion that reliability of the water supply will be enhanced.
- c. No factual or supporting data is provided to support the conclusion that water quality will be enhanced.

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

3A

3B

3C

3D

Letter 3

COMMENTER: Daniel Cormode

DATE: March 6, 2019

RESPONSE:

Response 3A

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

Response 3B

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

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

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

Response 3C

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

Response 3D

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



United States Department of the Interior

U.S. FISH AND WILDLIFE SERVICE

Ecological Services
Ventura Fish and Wildlife Office
2493 Portola Road, Suite B
Ventura, California 93003



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

March 12, 2019

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

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

Dear Ms. Cooper:

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

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

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

} 4A

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

<u>Common Name</u>	<u>Scientific Name</u>	<u>Threatened or Endangered</u>
Least Bell's vireo	<i>Vireo pusillus belli</i>	Endangered

} 4B

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

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

Sincerely,



Stephen P. Henry
Field Supervisor

Letter 4

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

DATE: March 12, 2019

RESPONSE:

Response 4A

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

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

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

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

Response 4B

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

Lauren Everett

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

From: "Daniel Cormode" <dcormode@sbcglobal.net>

Date: March 14, 2019 at 11:01:18 AM PDT

To: <bcooper@cityofventura.ca.gov>

Cc: <citymanager@cityofventura.ca.gov>, <council@cityofventura.ca.gov>, <watercommission@cityofventura.ca.gov>

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

06 March 2019

From: Daniel Cormode
186 Gorrion Ave
Ventura, CA 93004

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

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

1. The following are additional review comments relative to the subject EIR are provided for information and action as deemed appropriate.
2. The subject EIR fails to comply with Section 15131 of the Guidelines for Implementation of the California Environmental Quality Act Article 9 Contents of Environmental Impact Reports by not addressing the social and economic impact of adopting or not adopting the \$150M proposed project.
 - a. What is the expected impact of the project on water quality and availability on the quality of life of residents residing in the project areas?
 - b. What is the effect of the project on capital costs and commodity costs?
 - c. What is the expected economic impact of the project options on water rates and property taxes, especially to minority populations, economically disadvantaged persons or elderly persons on fixed incomes.?
3. The City Council has established that "there is a direct nexus between the availability of water supply and the immediate preservation of the public health and safety"; and, resolved that "the ordinary demands and requirements of the water consumers served by the City of San Buenaventura cannot be met by the water supplies now available to the City without depleting the water supply or diminishing its quality to the extent that there would be insufficient water for human consumption".^[1]

5A

5B

4. California Environmental Impact Reports (EIR) shall include social and economic information.
 - a. Environmental Impact Reports shall contain the information outlined in this article.^[2]
 - b. Draft EIRs shall contain the information required by Sections 15122 through 15131. Final EIRs shall contain the same information and the subjects described in Section 15132.^[3]
 - c. Description of the project shall contain the following information but should not supply extensive detail beyond that needed for evaluation and review of this environmental impact.^[4]
 - d. A general description of the project's technical, economic, and environmental characteristics considering the principal engineering proposals if any and supporting public service facilities.^[5]
 - e. Economic or social effects of a project may be used to determine the significance of physical changes caused by the project.^[6]
 - f. Economic, social, and particularly housing factors shall be considered by public agencies together with technological and environmental factors in deciding whether changes in a project are feasible to reduce or avoid significant effects on the environment.^[7]

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

5C

^[1] San Buenaventura City Council Resolution No. 2014-057 dated 09/22/2014

^[2] Title 14. California Code of Regulations, Chapter 3 Guidelines for Implementation of the California Environmental Quality Act, Article 9 Contents of Environmental Impact Reports. Section 15120(a).

^[3] Title 14. California Code of Regulations, Chapter 3 Guidelines for Implementation of the California Environmental Quality Act, Article 9 Contents of Environmental Impact Reports. Section 15120(c).

^[4] Title 14. California Code of Regulations, Chapter 3 Guidelines for Implementation of the California Environmental Quality Act, Article 9 Contents of Environmental Impact Reports. Section 15124.

^[5] Title 14. California Code of Regulations, Chapter 3 Guidelines for Implementation of the California Environmental Quality Act, Article 9 Contents of Environmental Impact Reports. Section 15124(c).

^[6] Title 14. California Code of Regulations, Chapter 3 Guidelines for Implementation of the California Environmental Quality Act, Article 9 Contents of Environmental Impact Reports. Section 15131(b).

^[7] Title 14. California Code of Regulations, Chapter 3 Guidelines for Implementation of the California Environmental Quality Act, Article 9 Contents of Environmental Impact Reports. Section 15131(c).

Letter 5

COMMENTER: Daniel Cormode

DATE: March 14, 2019

RESPONSE:

Response 5A

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

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

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

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

Response 5B

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

Response 5C

See Response 5A.

Lauren Everett

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

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

Thanks, Betsy

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

State Water Interconnection

First Name	George
Last Name	Naugles
Email Address	NauglesRCE@gmail.com

Share your comments on the State Water Interconnection Project

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

6A

Email not displaying correctly? [View it in your browser.](#)

Letter 6

COMMENTER: George Naugles

DATE: March 21, 2019

RESPONSE:

Response 6A

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

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

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

Submitted by Gerhardt Hubner

1. General Comment: Overall the Report is clear, concise, and understandable. The addition of an Executive Summary to the Report would be helpful. } 7A
2. Section No. 1, Project Description: This Project would also facilitate the City of Ventura's receipt of its SWP entitlements, as the City has no current means of having its SWP entitlement delivered. Recommend that the above objective be added globally throughout the Report whenever the Project is described. } 7B
3. Section 1.7 Project Objectives: Under the fourth bullet for the list of agencies recommend this addition to the bullet: "Allow the City of Ventura, Casitas and United to received their SWP entitlements. } 7B
4. Section 1.9.3. The description of Segment 2, the pipeline under the Santa Clara River is a bit incomplete. Horizontal directional drilling is listed as the technology, and Table 1-2 one column describes depth for Segment 2 as "minimal". However, there is no description defining "minimal". For example, how deep will the pipeline be placed below the Santa Clara River? How will the pipeline segment be anchored and secured? How will the pipeline be protected from scouring from certain flood events (10, 20, 50- and 100-year flood events)? A more complete description in the Report for this important component of the Project would be helpful. } 7C
5. Section 1.11.1 - Construction Schedule: As stated: "Construction is assumed to last approximately 30 months.." As a general comment, this seems lengthy for this type of Project. Perhaps construction can be initiated simultaneous on multiple pipeline segments to reduce this timeframe. } 7D
6. Section 1.3 Purpose and Intended Use of the EIR, Table 1-6, Potentially Required Permits, Approvals, and Consultations Permits. } 7E
 - a. I understand that Local Agency Formation Commission approval may be required for the Project, yet it is not one of the agencies listed on Table 1-6. If required, the process for this approval should be described in the Report, and any implications to the Project and schedule.
 - b. Permits and/or consultations may be needed for pipeline Segment 2 (crossing the Santa Clara River). No mention is made for any permits or consultation needed with State or Federal regulatory or resource agencies. For example, will RWQCB 401 Certification, Army Corps of Engineer or Fish and Game permits be needed for Segment 2 of the Project?

Letter 7

COMMENTER: Gerhardt Hubner, Ventura Water Commission

DATE: March 22, 2019

RESPONSE:

Response 7A

Thank you for your comment.

Response 7B

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

Response 7C

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

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

Response 7D

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

Response 7E

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

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

Comments to DRAFT EIR regarding State Water Interconnection Project

Suzanne McCombs March 25, 2019

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

Letter 8

COMMENTER: Suzanne McCombs, Ventura Water Commission

DATE: March 25, 2019

RESPONSE:

Response 8A

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

Response 8B

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

Response 8C

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

Response 8D

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

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

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

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

To: Cooper, Betsy

Subject: Re: Re EIR

Hi Betsy

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

} 9A

Burt Handy

Letter 9

COMMENTER: Burt Handy

DATE: April 1, 2019

RESPONSE:

Response 9A

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

DEPARTMENT OF TRANSPORTATION

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



*Making Conservation
a California Way of Life.*

Ventura Water
Received

APR 01 2019

March 28, 2019

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

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

Dear Ms. Cooper:

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

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

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

10A

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

10B

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

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

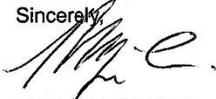
Ms. Betsy Cooper
March 28, 2019
Page 2 of 2

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

} 10C

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

Sincerely,



MIYA EDMONSON
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

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

Letter 10

COMMENTER: Miya Edmonston, Caltrans

DATE: March 28, 2019

RESPONSE:

Response 10A

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

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

Response 10B

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

Response 10C

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

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

Ms. Cooper

A couple of questions regarding the Draft EIR

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

11A

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

How will this water be used to enhance quality?

11B

1.7 Project Objectives

The project would be designed to achieve the following objectives:

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

1.9.1 Connection to City of Ventura Water System

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

11C

1.12.1 Annual Water Deliveries

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

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

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

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

1.12.2 Pumping Requirements

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

1.12.3 Maintenance Activities

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

Burt Handy

11C

Letter 11

COMMENTER: Burt Handy

DATE: March 27, 2019

RESPONSE:

Response 11A

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

Response 11B

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

Response 11C

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

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

Section 1.2

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

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

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

12A

Table A Water

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

12B

Water Quality

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

12C

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

Burt Handy

Letter 12

COMMENTER: Burt Handy

DATE: April 2, 2019

RESPONSE:

Response 12A

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

Response 12B

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

Response 12C

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



City of Camarillo

Department of Public Works

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

April 2, 2019

email: bcooper@cityofventura.ca.gov

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

Attn: Betsy Cooper

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

Lead Agency: City of San Buenaventura

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

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

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

1. Encroachment Permit, including traffic control plans, will be required for review and approval by the City of Camarillo Public Works Department for work within the City of Camarillo public Rights-of-Way.
2. Tentative Tract Map 5671M(3) is pending on 43.3 acres located west of Springville Drive, north of U.S. 101. The subdivision is for the development of 158 detached condominium units. The proposed pipeline is located on the westerly boundary of the subdivision and will require coordination to ensure that no permanent structures would be located on top of the pipeline.

13A

13B

3. There is an existing eucalyptus windrow where the pipeline is proposed, west of Springville Drive. The EIR does not state what measures will be taken to prevent damaging or impacting the trees and its root structure, or mitigation to replace any lost trees. The windrow serves the purpose of providing for an agricultural buffer and will need to be maintained for the development of the vacant land to the east that is proposed for residential development. } 13C
4. The EIR should acknowledge the presence of single-family residential uses adjacent and near the project that could be impacted by construction noise and trenching activities. Construction within the City of Camarillo must comply with CMC Section 10.34.120 Construction, Buildings and Structures. It is unlawful for any person adjacent to or within any residential zone in the city to operate power construction equipment or tools or perform any outside construction or repair work on buildings, or structures to operate any pile driver, steam shovel, pneumatic hammer, steam or electric hoist, or other construction device between the hours of seven p.m. of one day to seven a.m. of the next day or at any time on any Sunday, or at any time on any public holiday, in such a manner as to violate the noise standards set forth in CMC Sections 10.34.040, 10.34.050, or 10.34.060. } 13D
5. Design and locations of any above-ground structures must be submitted to the City of Camarillo Community Development Department for review and approval. } 13E
6. The City of Camarillo CIP Division has concerns related to the Project due to planned future City of Camarillo Capital Improvement Projects (CIP) and impacts to these projects. The City of Camarillo CIP projects will generally be in existing City of Camarillo Rights-of-Way on Daily Drive and Central Avenue which will require coordination on the design of the Project's proposed pipeline and alignment. Some of the improvements proposed by the City of Camarillo will require right-of-way acquisition. The City of Camarillo requests that the City of Ventura coordinate on construction timing and Right-of-Way impacts/acquisition. The City of Camarillo is requesting that any pipeline structures and surface features (air vac, blow offs, manholes, etc) be placed so they do not interfere with City of Camarillo infrastructure. The City of Camarillo has gravity lines (sewer or drainage) and a box culvert that may be crossing the alignment of the Ventura Waterline Project, so planning and coordination to accommodate crossings will be necessary and utility crossings (dips) in the waterline will need to be constructed. } 13F
7. Due to the extensive construction timeline anticipated, the City of Camarillo is requesting that streets receiving heavy equipment traffic be repaired after pipeline construction. and an overlay, reconstruction or other treatments are anticipated to be necessary, depending on the level of damage. This includes the pipeline alignment, haul routes and any other streets receiving construction traffic. Sometimes, caving of pipeline trenches occurs and pavement damage occurs and these issues will require repairs by the City of Ventura. Coordination on planned overlays and resurfacing projects will also be needed. } 13G

Betsy Cooper
April 2, 2019
Page 3 of 3

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

} 13H

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

Sincerely,



David Klotzle
Director of Public Works

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

Letter 13

COMMENTER: David Kotzle, City of Camarillo

DATE: April 2, 2019

RESPONSE:

Response 13A

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

Response 13B

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

Response 13C

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

Response 13D

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

Response 13E

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

Response 13F

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

Response 13G

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

Response 13H

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

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

CONFIDENTIALITY NOTICE THIS E-MAIL IS COVERED BY THE WIRETAP ACT AND ELECTRONIC COMMUNICATIONS PRIVACY ACT: 18 U.S.C. SECS. 2510-2522 AND IS ALSO PROTECTED BY THE ATTORNEY CLIENT PRIVILEGE, THE ATTORNEY WORK PRODUCT PROTECTION AND THE RIGHT OF PRIVACY. IT

IS SOLELY FOR REVIEW BY THE INTENDED RECIPIENT. UNAUTHORIZED INTERCEPTION, REVIEW, USE, CONTENT EXTRACTION AND/OR DISCLOSURE IS PROHIBITED AND WITHOUT CONSENT AND MAY VIOLATE APPLICABLE LAWS. IF YOU ARE NOT THE INTENDED RECIPIENT, PLEASE CONTACT THE SENDER AND PERMANENTLY DELETE THIS E-MAIL AND ANY ATTACHMENTS.

Dear Ms. Cooper,

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

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

14A

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

14B

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

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

Mark E. Hancock Ventura, CA

Letter 14

COMMENTER: Mark Hancock, Law Offices of Mark Hancock

DATE: April 2, 2019

RESPONSE:

Response 14A

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

Response 14B

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

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

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

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



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

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

March 25, 2019

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

Attn: Ms. Betsy Cooper

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

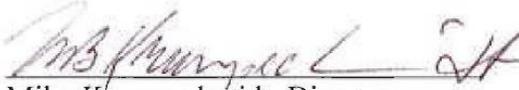
Our primary comment is related to the project need and does not affect your impact analysis. MOWD is one of Casitas MWD's resale agencies that are discussed in the EIR as a group. As stated in the EIR, during dry periods some resale agencies, including MOWD, rely exclusively on deliveries from Lake Casitas.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

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

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

Sincerely,


James Kentosh, Vice President
Meiners Oaks Water District


Mike Krumpschmidt, Director
Meiners Oaks Water District

15A

15B

Letter 15

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

DATE: March 25, 2019

RESPONSE:

Response 15A

Thank you for your comment.

Response 15B

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



Ventura County Transportation Commission

April 4, 2019

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

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

Dear Ms. Cooper,

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

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

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

Respectfully,

Steve DeGeorge Planning Director