

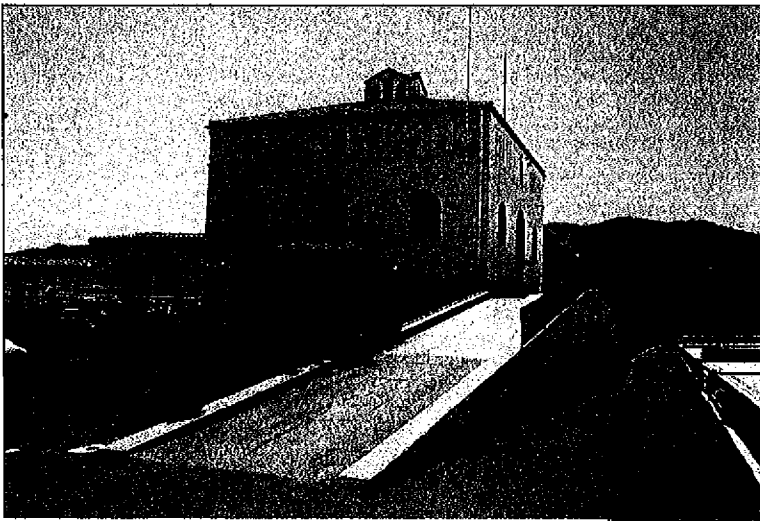
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FINAL ENVIRONMENTAL IMPACT REPORT

AVENUE WATER TREATMENT PLANT/ FOSTER PARK FACILITIES IMPROVEMENTS PROJECT

April 2004



*The Final EIR also includes the
November 2003 Draft EIR*



CEQA Lead Agency

City of San Buenaventura
Public Works Department & Planning Division
501 Polk Street
Ventura, California 93002

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April 2004

NOTE: The Final EIR consists of this document and the Draft EIR dated
November 2003

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SECTION I

EXECUTIVE SUMMARY

I. OVERVIEW OF THE PROPOSED PROJECT

The Ventura Avenue Water Treatment Plant (WTP) and the Foster Park water production facilities are owned and operated by the City of San Buenaventura (City). Their locations are shown on Figures 1 through 3. The water treated at the WTP comes from two sources: (1) surface water collected from the Ventura River and underlying alluvium at and near Foster Park; and (2) water from the upper Ventura River, stored in Lake Casitas and treated in Casitas Municipal Water District's (CMWD) Marion Walker water treatment facility.

The City's WTP was originally constructed in the late 1930's and the plant has been modified and upgraded several times over the years. The plant presently meets or exceeds all current state regulations and requirements, except for the filter backwash recycling rule. However, the age of the existing facilities, and new and upcoming water quality regulations, necessitate improvements to the WTP.

The Ventura River supplies about one-third of the City's annual water supply through the City's Foster Park facilities. These facilities include a surface water diversion, an underground dam, two subsurface intake pipes, and four shallow wells within the Ventura River alluvium. Water produced at the facilities is conveyed by gravity and pumping to the WTP. Flooding in the Ventura River in the past 10 years has damaged several of the water wells and changed the river course such that surface water diversion cannot be utilized without modification to current river channel conditions. Hence, water production has become limited.

In July 1999, the City completed the *Avenue Treatment Plant/Foster Park Master Plan*. The Master Plan was a comprehensive study that phased improvements of the Foster Park diversion facilities and treatment plant capability while meeting future drinking water quality regulations. Based on the 1999 *Master Plan* and associated subsequent studies, the City prepared a *Preliminary Design Report* for the recommended Avenue Water Treatment Plant/Foster Park Facility Improvements Project (Project), which is the subject of this Environmental Impact Report (EIR).

The overall purposes of the proposed Project are twofold: (1) modify the Foster Park facilities and the existing WTP in order to restore the pre-project source water production and treatment capacity of 15 million gallons per day (MGD); and (2) treat the source water to meet the current and future anticipated requirements of the Safe Drinking Water Act. The proposed Project will be implemented in two or more phases, as summarized below:

- Phase I improvements are currently funded by a State Revolving Fund loan and City capital reserves, and will be implemented immediately. At the WTP, the conventional filtration will be replaced as the primary treatment process with submerged low-pressure membrane ultrafiltration. Other WTP improvements include new washwater recovery basins and return water pretreatment; new sludge drying beds; and new chemical storage and feed systems in a

new chemical building. These improvements will restore up to 10 MGD treatment capacity. Phase I also include up to three new wells and associated pipelines in and near Foster Park.

- Phase II improvements include the possible construction of a new administration building at the WTP, an additional 5 MGD treatment capacity (for a total capacity of 15 MGD), possible additional new wells at Foster Park to replace lost surface diversion capacity, and the possible removal of the existing surface diversion facilities in the Ventura River for environmental purposes. Depending upon funding, this phase may be divided into several phases.

The City seeks to increase the peak or instantaneous production rate from the Foster Park facilities. The long-term historic average annual production from the Foster Park facilities would remain the same under the proposed Project – that is, about 6,700 acre-feet per year. However, the City would have the ability to increase production during periods of higher water availability in the Ventura River watershed (e.g., winters with high runoff). This flexibility in pumping rates will allow the City to reduce water production from the Ventura River during other periods when water availability is low, or when the flows are important for supporting aquatic habitat.

2. SCOPE OF THE ENVIRONMENTAL ANALYSIS

The California Environmental Quality Act (CEQA) requires that local, regional, and state agencies and special purpose districts prepare an Environmental Impact Report (EIR) for any discretionary action that may have the potential to significantly affect the quality of the environment. The City prepared this EIR in order to evaluate impacts of the proposed Project and identify mitigation measures and alternatives to reduce adverse impacts, in compliance with CEQA. The analyses and conclusions in the EIR will be used by the City when making final decisions about the implementation of the Project.

As noted above, the proposed Project includes two phases. Detailed engineering information on the Phase I facilities and improvements is currently available. As such, the environmental impacts of these elements of the Project are addressed at a conventional “project-level” analysis in the EIR. The design of the Phase II facilities has only been completed at a conceptual level, and will be further developed in the future as funding allows. As such, the environmental impacts of the Phase II facilities and improvements are addressed in the EIR at a “program level.” Once the City has decided to complete the Phase II facilities and more detailed design information is available, a subsequent environmental review may be required to fully evaluate the site-specific impacts of the Phase II facilities.

Per Section 15381 of the *CEQA Guidelines*, the Lead Agency has the primary discretionary authority over a project. Responsible Agencies are public agencies which may need to issue a permit or other approval in order for the project to be implemented. Responsible Agencies for the proposed Project include the California Department of Health Services (for the State Revolving Fund loan and an amendment to the City’s water supply permit), California Department of Fish and Game (for approvals of in-river actions), Regional Water Quality Control Board, Los Angeles Region (for dewatering and well discharge permits), and the County of Ventura, Watershed Protection District and General Services (for certain actions in Foster Park).

3. PUBLIC PARTICIPATION

The City issued a Notice of Preparation (NOP) for the EIR on September 16, 2002 to involved local, state, and federal agencies, as well as to environmental groups, landowners, and other parties with interests in the Project. A public scoping meeting was conducted in Ventura on September 25, 2002. Comments received at the meeting and by mail were considered during the preparation of the Draft EIR.

The Draft EIR was issued for a 45-day public review on December 1, 2003. A public meeting to receive comments on the Draft EIR was conducted on December 17, 2003. There were no attendees or comments. Three comments letters, all from public agencies, were received during the public comment period. Responses to the comments were prepared and are included in the Final EIR. The responses did not require any revisions to the EIR impact analyses or conclusions.

The City will conduct a public hearing on April 19, 2004 to consider certification of the Final EIR and approval of the Project.

4. SUMMARY OF ENVIRONMENTAL IMPACTS

A summary of the environmental impacts of the proposed Project is presented in Table ES-1. The proposed Project would result in two significant, unavoidable (Class I) impacts:

- Loss of Mature Willow Trees at the WTP Site. Construction of the WTP facility improvements would remove 20 large willow trees (12 to 32 inches in diameter) associated with the existing sludge basins. The trees provide cover for resident and migratory birds that occur along the Ventura River. The grove of trees does not support breeding birds or raptors. The trees cannot be avoided because there is insufficient space to accommodate the trees and the proposed facilities. The City has determined that planting willow trees along the perimeter of the new sludge basins would not be feasible because there is insufficient space for the trees, and their presence would interfere with facility operations and maintenance. In order to compensate for the loss of the trees, the City would plant replacement willow trees on City property north of Foster Park. The City will replace the trees at a 3:1 ratio. Over time, the replacement trees could achieve the same stature and biological function as the existing trees. However, there would be a time lag of 10 years or more for the new trees to grow to similar heights. Based on this delay in fully compensating for the loss of the trees, the impact is considered significant.
- Construction Related Noise Impacts on Nearby Residences. There will be a temporary increase in ambient noise levels near the WTP site and Foster Park during certain construction activities under Phases I and II. The increased noise levels would be perceptible at the nearest residences. The predicted increase in ambient noise levels at noise sensitive receptors near the WTP and Foster Park due to construction related noise generation would exceed Ventura County's construction noise impact threshold. Increases in ambient noise levels would be intermittent and temporary, and associated with only certain noise generating activities such as large cranes, concrete trucks, and portable generators. All construction work would be restricted to day time hours (7 AM to 7 PM). Under the City of Ventura's

ordinance, these increases in ambient noise levels are allowable. However, using the County's conservative noise impact thresholds, such increases are considered significant and unavoidable.

The proposed Project would result in the following **potentially significant, but mitigable impacts (Class II)**. Mitigation measures to avoid these significant impacts are presented in Table ES-1. Implementation of the recommended mitigation measures would ensure that all residual impacts would be less than significant.

- Potential decrease in groundwater levels in the Ventura River alluvium at, upstream, and downstream of Foster Park that could significantly affect groundwater conditions, aquatic habitat, riparian vegetation, and the endangered southern steelhead.
- Work in the river to remove the subsurface collector under Phase II has the potential to alter the river channel and local hydraulic conditions.
- Construction of the well pad for Well No. 11 and installation of a water pipeline north of Foster Park would also result in the removal of several small oak trees and a small native walnut tree.
- Potential damage to large oak trees due to construction along the pipeline routes, and at Well Nos. 9 and 13.
- Disturbance to riparian scrub vegetation due to the installation of the rock groin at Nye Well No. 7
- Adverse effects on the historic properties of the WTP site, particularly the Administration Building, due to demolition of certain facilities and construction of new ones.
- Visual impact of the new subsurface collector facility in the center of Foster Park.

5. ALTERNATIVES

Five alternatives were evaluated in the EIR, and are summarized below.

No Project Alternative

Under this alternative, the City would not upgrade the WTP, nor increase production capacity at Foster Park. The City would eventually fail to meet drinking water quality standards, and would have to terminate services to the community. This alternative is considered infeasible and undesirable. It would result in a significant impact to public health and safety because the City's primary water source would become unreliable, and eventually, unavailable. There would be no feasible mitigation to avoid this significant impact to the public.

Alternatives to Avoid Significant Unmitigable Impacts

Two significant unavoidable impacts have been identified for the proposed Project: (1) loss of 20 large willow trees at the WTP site due to the installation of new sludge drying beds; and (2) short-term construction related noise that could affect several residences near the WTP and Foster Park.

A potential alternative that would avoid the willow tree loss would be to retain the current earthen sludge drying beds and continue their use. This alternative is not considered feasible because the new treatment process requires a greater area for sludge dewatering than provided by the existing sludge drying beds. Hence, the existing beds would need to be enlarged for the new treatment process under any circumstances. No additional space is available on the WTP site for this purpose due to the severe space limitations and the need for new equipment at other locations on the site. Hence, this alternative is not considered feasible.

There is no feasible alternative to avoid the short-term construction related noise impact at the WTP and Foster Park sites. There are no alternative construction methods or equipment that would be feasible, cost effective, and less noisy than the proposed conventional equipment.

Alternative Treatment Processes

The City conducted a thorough evaluation of an alternative treatment process - ozonation/direct filtration. The City determined that it would be less desirable than the proposed ultrafiltration process because it would have more complex operations, involve the use of a toxic substance (i.e., ozone), and present more limitations on meeting future drinking water regulatory requirements. However, there would be no significant difference in the environmental impacts of an ozone treatment alternative compared to the proposed Project.

Alternative Well Locations at Foster Park

The City conducted a detailed evaluation of well locations at Foster Park (Fugro, 2002). The proposed locations were based on the desire to avoid placing wells in or near the river channel, while locating wells to maximize water production. Alternative well locations that are further from the river would not provide the water production required by the City, and as such, would not meet the Project objectives.

The City examined the use of a subsurface well gallery (Ranney collector) installed upstream of the subsurface dam. While this type of facility is very effective and may exhibit the desired water production rates, it would require significant excavation of the river channel, diversion of the river during construction, and temporary dewatering of the river alluvium. Hence, this alternative would have substantially greater impacts than the proposed Project.

Alternative Bank Protection for Well No. 7

There are two alternatives to the proposed rock groin at Well No. 7: (1) eliminate the rock groin and increase the exposure and likelihood of damage to the well pad from flood flows, with the understanding that the pad will be reconstructed after any damage; and (2) install grouted rock rip-rap on the banks of the well pad to armor it from erosive flood flows instead of using a rock groin that protrudes into the river. The first alternative would avoid the impacts to riparian habitat associated with the rock groin, although it may require more frequent repairs of the well pad banks after severe floods. The second alternative would have similar construction related impacts as the proposed Project. That is, it would involve the temporary removal or disturbance of riparian habitat along the river banks. However, this alternative would not involve a structure that extends into the river channel.

**TABLE ES-1
SUMMARY OF IMPACTS AND MITIGATION
AVENUE TREATMENT PLANT/FOSTER PARK FACILITY IMPROVEMENTS PROJECT***

DESCRIPTION OF IMPACT BY ISSUE AREA	MITIGATION MEASURES	RESIDUAL IMPACT LEVEL
<i>CLASS I IMPACTS: SIGNIFICANT AND UNAVOIDABLE</i>		
<p><i>Biological Resources</i></p> <p>The WTP facility improvements would remove 20 large willow trees (trunk diameters of 12 to 32 inches) associated with the existing sludge basins. The trees provide cover for resident and migratory birds that occur along the Ventura River. The grove of trees does not support breeding birds or raptors. The trees cannot be avoided because there is insufficient space to accommodate the trees and the proposed facilities. The City has determined that planting willow trees along the perimeter of the new sludge basins would not be feasible because there is insufficient space for the trees, and their presence would interfere with facility operations and maintenance. In order to compensate for the loss of the trees, the City would plant replacement willow trees as described in Mitigation Measure BIO-1.</p> <p>The trees can be replaced at a suitable location as mitigation for their removal. Over time, the replacement trees could achieve the same stature and biological function as the existing trees. However, there would a time lag of 10 years or more for the new trees to grow to similar heights. Based on this delay in fully compensating for the loss of the trees, the impact is considered significant.</p>	<p>BIO-1. The City shall replace the twenty willow trees to be removed at the WTP site at a suitable location on City property north of Foster Park. The location shall contain appropriate soil and hydrologic conditions to support willow trees. Suitable sites may include both stream terraces above the Ventura River, or the base of the river banks in a location where the trees would not be scoured by flood flows of less than a 10-year return interval. Trees shall be planted in a dense grove to re-create the biological functions of the affected willow trees. The trees shall be replaced at a 3:1 ratio to account for unavoidable plant mortality. Hence, 60 trees will be planted in the winter following the completion of the WTP improvements using 1- or 5-gallon container plants. The City shall <u>will</u> implement a 3-year restoration program in which the trees shall be monitored and maintained to ensure reasonable survival and growth, while preventing colonization by non-native weeds in the restoration area. The City shall develop growth and survival performance criteria that reflect the restoration site conditions.</p>	<p>Significant until the trees are fully grown</p>

*Note: changes from the Draft EIR are shown with ~~strikeout~~ and underlining

TABLE ES-I

DESCRIPTION OF IMPACT BY ISSUE AREA	MITIGATION MEASURES	RESIDUAL IMPACT LEVEL
<p>Noise</p> <p>There will be a temporary increase in ambient noise levels near the WTP site and Foster Park during certain construction activities under Phases I and II. The increased noise levels would be perceptible at the nearest residence. The predicted increase in ambient noise levels at noise sensitive receptors near the WTP and Foster Park due to construction related noise generation would exceed Ventura County's construction noise impact threshold. Increases in ambient noise levels would be intermittent and temporary, and associated with only certain noise generating activities such as large cranes, concrete trucks, and portable generators. All construction work would be restricted to day time hours (7 AM to 7 PM). Under the City of Ventura's ordinance, these increases in ambient noise levels are allowable. However, using the County's conservative noise impact thresholds, such increases are considered significant and unavoidable.</p>	<p>N-1. For high-noise activities taking place in Foster Park within approximately 200 feet of residences, portable noise barriers shall should be placed near the noise-producing equipment, between the noise source and the receptors if the use of such barriers are determined to be feasible and effective by an acoustical engineer</p> <p>N-2. The following measures shall be implemented during construction at both the WTP site and Foster Park:</p> <ul style="list-style-type: none"> - Equipment mufflers shall be maintained in proper operating order. All equipment shall be operated in the quietest manner practicable. - To the extent feasible, the noisiest operations shall be scheduled to occur simultaneously in the construction program to avoid prolonged periods of annoyance. - Material stockpiles and/or vehicle staging areas shall be located as far as practical from dwellings. - Any public address system operated on the project site shall be designed and adjusted for minimum sound levels and minimum "spillover" of sound onto adjacent properties. - No music or electronically reinforced speech shall be audible at a noise-sensitive property. 	<p>Significant during construction only</p>

TABLE ES-1

DESCRIPTION OF IMPACT BY ISSUE AREA	MITIGATION MEASURES	RESIDUAL IMPACT LEVEL
<i>CLASS II IMPACTS: SIGNIFICANT, BUT MITIGABLE</i>		
<p>Water Resources</p> <p>Increased peak water production at Foster Park could reduce groundwater levels in the river alluvium at, above, and below Foster Park, depending upon the duration of the higher water production. The magnitude of this impact is expected to be minor because the peak production rates would only occur for weeks to months when water is abundant in the river and the alluvium is saturated. In addition, the impact would be temporary and reversible once the production rates return to lower levels. However, because this impact cannot be accurately predicted, it is considered a potentially significant impact that can be mitigated by reducing the higher water production from Foster Park when it could cause adverse upstream and downstream impacts. [Phases I and II]</p>	<p>W-5. The proposed River Monitoring Program shall incorporate monitoring potential adverse effects on alluvial groundwater levels and quality upstream of the City's property at Foster Park, and downstream of Foster Park. The program shall include monitoring groundwater levels prior to and during weekly production from Foster Park that exceeds 4,000 gpm, on average. The monitoring shall be designed to detect changes in groundwater levels and quality, if any, associated with increased water production from the City's facilities in Foster Park above historic peak production rates. The City shall review the data on a real-time basis to determine if there is a measurable effect on groundwater levels upstream and downstream of Foster Park area that is attributable to the City's well production rates. If such an effect is detected, the City shall evaluate whether the changes are sufficient to affect surface water levels and quality in the river, riparian vegetation, and aquatic habitat, in consultation with USFWS and NMFS. If there is a potential to significantly affect these resources due to increases in peak production rates, the City shall reduce pumping to reduce or eliminate the impact. The program shall include the biological monitoring criteria from Mitigation Measure BIO-6.</p>	<p>Less than significant</p>

TABLE ES-1

DESCRIPTION OF IMPACT BY ISSUE AREA	MITIGATION MEASURES	RESIDUAL IMPACT LEVEL
<p>The work in the river under Phase II has the potential to alter the river channel due to earthmoving and trenching activities at and near the subsurface collector. The changes in hydraulic conditions cannot be predicted at this time without more information on the extent of grading, and the need, if any, to restore and stabilize river banks.</p>	<p>W-6. The environmental impacts of the Phase II construction activities at and near Foster Park shall be evaluated in a detailed CEQA environmental document that is tiered from this Program EIR. The evaluation shall include mitigation measures to avoid significant impacts related to erosion, sedimentation, and water quality due to construction activities. The measures shall include the following general guidelines, among others identified during the environmental review.</p> <p>Work in the river channel shall only occur during the non-storm flow period, 1 April to 1 December. Prior to commencing the in-channel work under Phase II, the City shall prepare a detailed stream diversion, dewatering, and erosion control plan. Post construction stabilization shall include restoration of river channel bed and bank to pre-construction conditions, and revegetation of suitable areas with riparian plants. Only bio-technical bank stabilization shall be used if necessary to restore banks affected by construction. The plan shall also include restoration of upland areas affected by micro-tunneling or horizontal directional drilling. This restoration shall include native plant revegetation to stabilize these floodplain areas from future flood events.</p>	<p>Less than significant</p>
<p><i>Biological Resources</i></p> <p>Construction of the well pad for Well No. 11 would result in the removal of a 6-inch diameter coast live oak tree in the center of the site. Installation of the pipeline north of Foster Park to serve the new wells would also result in the removal of an 8-inch coast live oak and a 6-inch walnut tree that are located in the pipeline corridor.</p>		
	<p>BIO-3. The City shall replace all native trees (4 inches in diameter or more) removed for the well pads and pipeline on City property north of Foster Park. Tree shall be replaced at a 3:1 ratio at sites with suitable soil, exposure, and drainage conditions. The City shall prepare a post-construction tree replacement plan that specifies the methods and materials to replace native trees. The plan shall include pre-planting site treatment (such as weed eradication and soil preparation), tree propagation and installation methods, pest and predator protection, and a 3-year maintenance and monitoring program to ensure successful establishment of the trees under natural conditions and rainfall. All trees should be derived from local genetic stock, as available. Trees shall be planted in the first winter following completion of construction and irrigated as necessary to achieve the target growth and survival rates.</p>	<p>Less than significant</p>

TABLE ES-1

DESCRIPTION OF IMPACT BY ISSUE AREA	MITIGATION MEASURES	RESIDUAL IMPACT LEVEL
<p>The pipeline corridor in Foster Park would not traverse any native or non-native vegetation types. Areas that would be temporarily affected include turf, barren dirt, and paved areas. At this time, it does not appear that any native or ornamental trees would be removed for the installation of the pipeline in Foster Park. However, there is a potential to damage large native trees adjacent to the pipeline route during construction. This impact would be reduced to less than significant levels by avoiding the trees to the maximum extent feasible (Mitigation Measure BIO-4), and where avoidance is not feasible, the City would replace native trees at the project site (Mitigation Measure BIO-3).</p>	<p>BIO-4. The proposed well pads and pipeline routes shall be located and configured to avoid removal of any large native trees, to the extent feasible. The City shall consult with an arborist when developing the limits of the proposed well pads and the pipeline routes to ensure maximum avoidance of tree roots and branches, and to identify methods to minimize damage to roots during construction work.</p>	<p>Less than significant</p>
<p>Installation of the rock groin at Nye Well No. 7 in Phase II will result in the temporary disturbance of about 1,800 square feet of riparian scrub habitat, and permanent loss of about 900 square feet of riparian scrub habitat. The groin would extend about 35 feet into the river channel. These impacts are considered potentially significant, but mitigable because they involve habitat disturbances within the river channel. The impacts can be mitigated by restoring the temporarily disturbed areas after construction, and providing compensatory habitat restoration for the permanent habitat losses, as described in Mitigation Measure BIO-5.</p>	<p>BIO-5. The City shall restore the temporary disturbance zone established during the installation of the rock groin at Nye Well No. 7 by installing container plants and/or seeding the area with native riparian plants common to the river channel. The area shall be restored prior to the winter following construction. The City shall prepare a restoration plan that specifies pre-planting soil preparation and weeding, plant mixture and density, performance criteria for growth and survival, supplemental watering practices, and a 3-year maintenance and monitoring effort. To compensate for the loss of about 900 square feet of riparian scrub habitat, the City shall remove giant reed from 3,000 square feet of the river bank near Nye Well No. 7 in order to allow native plants to colonize the treated area. Giant reed shall be removed and excluded from the treated area for three years.</p>	<p>Less than significant</p>

TABLE ES-1

DESCRIPTION OF IMPACT BY ISSUE AREA	MITIGATION MEASURES	RESIDUAL IMPACT LEVEL
<p>The increased peak water production from Foster Park could reduce groundwater levels at, upstream, and downstream of Foster Park. A reduction in alluvial groundwater levels could, in turn, affect riparian vegetation and aquatic habitat along this portion of the river. The increased peak water production could also cause localized drawdowns in the water levels in the river alluvium at Foster Park, upstream of the submerged dam. The drawdowns could adversely affect surface water in the river, reducing surface flows and drying up ponds. In addition, it could adversely affect riparian vegetation and wetlands associated with high water levels in the river alluvium at Foster Park. The magnitude of these impacts is expected to be minor because the peak production rates would only occur for weeks to months when water is abundant in the river and the alluvium is saturated. However, because this impact cannot be accurately predicted, it is considered a potentially significant impact that can be mitigated by reducing the well production from Foster Park when it could cause adverse downstream impacts (Mitigation Measures W-5 and BIO-6).</p>	<p>Mitigation Measure W-5 is presented on page ES-9 in Class II impacts for water resources.</p> <p>BIO-6. The proposed River Monitoring Program shall incorporate biological habitat monitoring to detect and evaluate potential adverse effects on aquatic habitat and riparian vegetation in the river due to reduced alluvial groundwater levels at, upstream, and downstream of Foster Park. The monitoring shall be designed to detect changes in sizes and depths of pools and live streams, <u>water temperatures, and riparian plant conditions</u>, and to determine if such changes are due to peak production from the City's <u>proposed new and modified wells</u> at and near Foster Park that exceed the historic peak well production rates. The City shall <u>collect and review the biological data at sufficient frequency intervals to provide a reliable factual basis</u> to determine if there is a measurable effect on <u>aquatic habitats and riparian vegetation that is attributable to a change in groundwater level due to peak well production. that exceed historic rates</u>. If such an effect is detected, the City shall evaluate whether the changes are sufficient to affect the condition of fish (including the southern steelhead) and riparian <u>vegetation plants in consultation with USFWS and NMFS</u>. If there is a potential to significantly affect these resources due to increases in peak well production rates from the new and modified wells, the City shall reduce <u>modify</u> pumping to reduce or eliminate the impact. The program shall include the groundwater monitoring criteria from Mitigation Measure W-5. <u>The biological monitoring program shall include measurable criteria and thresholds developed with US Fish and Wildlife Service and NOAA Fisheries, and specific adaptive management actions to be implemented when adverse impacts are detected. Such actions may include reducing peak pumping for a specified duration, modifying the time of day for certain pumping rates, modifying the number and locations of wells pumping at a certain rate, and other modifications of the pumping regime that would reduce impacts. The biological monitoring program and adaptive management actions shall be consistent with the results of the Section 7 endangered species consultation for this project between the Environmental Protection Agency (the funding source) and US Fish and</u></p> <p><i>(see next page)</i></p>	<p>Less than significant</p>

TABLE ES-1

DESCRIPTION OF IMPACT BY ISSUE AREA	MITIGATION MEASURES	RESIDUAL IMPACT LEVEL
<i>(continued from previous page)</i>	<u>Wildlife Service and NOAA Fisheries. The increased peak pumping regime using the new and modified wells shall not commence until this consultation process has been completed, and US Fish and Wildlife Service and NOAA Fisheries have approved, or concurred with, the biological monitoring and adaptive management program developed pursuant to this mitigation measure.</u>	
Installation of Well No. 13 in the center of Foster Park would not result in the loss of any native habitat. However, the well will be located adjacent to several large sycamore trees. Construction activities could damage or adversely affect the roots and branches of these trees. A significant impact would be avoided by implementing Mitigation Measure BIO-4.	See Mitigation Measure BIO-4 above	Less than significant
Well No. 9 is located on the west side of the river, between a large stand of giant reed on the river bank and several large oak trees. The well pad consists of non-native annual grassland. Loss of the grassland is not considered a significant impact. Construction activities could damage or adversely affect the roots and branches of the nearby oak trees. A significant impact would be avoided by implementing Mitigation Measure BIO-4.	See Mitigation Measure BIO-4 above	Less than significant

TABLE ES-I

DESCRIPTION OF IMPACT BY ISSUE AREA	MITIGATION MEASURES	RESIDUAL IMPACT LEVEL
<p><i>Historic Resources</i></p> <p>The proposed improvements at the WTP site under Phase I would result in significant impacts to the historic resources at the site, including loss of design integrity; loss of integrity of feeling and association; loss of historic features; introduction of elements which are out of character with the historic property; and reduced ability to interpret the functional relationships between these features and the operation of the WTP as a whole. A loss of design integrity may also result, depending on the design of the public art project.</p>	<p>HR-1. In consultation with a qualified historic preservation professional, the historically significant buildings and structures and features listed in Table 4-4 which will be modified or removed shall be documented in accordance with <u>National Park Service's Historic American Building Survey/Historic American Engineering Record</u> (HABS/HAER) standards. This documentation shall include archival quality photographs of exterior features, elevations and significant interior features. Scaled, "as built" site plan and floor plans shall also be produced where existing plans or records will not suffice. The documentation package shall be archived at an appropriate location to be determined by the City.</p> <p>HR-2. In consultation with a qualified historic preservation professional, the City shall produce an onsite and/or offsite interpretive plan for the property focused on the history of water in Ventura in general and the role of the Avenue Water Treatment Plant in particular. The interpretative plan may consist of but not be limited to monuments, plaques or other publicly-available, permanent displays of pertinent historical information. To the greatest extent feasible, the proposed public art project planned for the site shall be combined with the interpretive plan in a manner which conforms to the <i>Secretary of the Interior's Standards for the Treatment of Historic Properties</i>, and aids in the interpretation of the historic themes.</p> <p>HR-3. To the greatest extent feasible, all modifications to historic building and structures on the property shall be undertaken in conformance with the <i>Secretary of the Interior's Standards for the Treatment of Historic Properties</i>. These alterations shall not unnecessarily destroy historic materials or architectural features that characterize the property. Particular attention shall be given to addressing any structural and architectural issues related to the removal of the ramp on the northern side of the Administration Building and the western sedimentation basins. <u>The</u> plans shall be prepared in consultation with a qualified historic preservation professional.</p>	<p>Less than significant</p>

TABLE ES-I

DESCRIPTION OF IMPACT BY ISSUE AREA	MITIGATION MEASURES	RESIDUAL IMPACT LEVEL
<p>Pending adequate funding in Phase II, the City would construct a new Administration Building. Under Phase II, the City will also remove the historic subsurface collector and surface water diversion in the river channel to Foster Park and notch the top of the exposed subsurface dam. The above modifications to the WTP site and at Foster Park under Phase II would result in the following impacts to the historic resources: a reduction in design integrity for the WTP as a whole; loss of historic features within the Administration Building which are important to interpreting its historic function, as well as requiring structural modifications which are out of character with the building; and removal of the surface diversion and subsurface collector at Foster Park would result in a loss of design integrity for the property and reduce the ability to interpret the functional relationships between these features and the operation of the WTP as a whole.</p>	<p>HR-4. In consultation with a qualified historic preservation professional, all historically significant buildings and structures listed in Table 4-4 which will be modified or removed shall be documented in accordance with <u>National Park Service's Historic American Building Survey/Historic American Engineering Record (HABS/HAER)</u> standards. This documentation shall include archival quality photographs of exterior features, elevations and significant interior features. Scaled, "as built" site plan and floor plans shall also be produced where existing plans or records will not suffice. The documentation package shall be archived at an appropriate location determined by the City.</p> <p>HR-5. To the greatest extent feasible, the construction of the new administration building, and alterations to the existing Administration Building required meet seismic requirements and for adaptive reuse, shall be undertaken in conformance with the <i>Secretary of the Interior's Standards for the Treatment of Historic Properties</i>. The plans shall be prepared in consultation with a qualified historic preservation professional.</p>	<p>Less than significant</p>
Visual Resources		
<p>Installation of Well No. 13 and the new subsurface collector during Phase II of the project would result in two new structures in the main portion of the park. These structures could detract from natural setting in the park, and as such, represent a potentially significant, but mitigable impact. The visual impacts of these structures could be reduced to less than significant levels by landscaping and design features</p>	<p>VIS-1. The visual impacts of Well No. 13 and the new subsurface collector in Foster Park shall be evaluated in a detailed CEQA environmental document that is tiered from this Program EIR. The evaluation shall include mitigation measures to avoid significant visual impacts by the following measures, and others, as necessary: landscaping around the well pad and structure for screening, use of earth tones for the concrete well pad and fence coating to reduce visual contrast, and architectural design of the collector building that matches the existing restroom facilities at the north end of the park.</p>	<p>Less than significant</p>

TABLE ES-I

DESCRIPTION OF IMPACT BY ISSUE AREA	MITIGATION MEASURES	RESIDUAL IMPACT LEVEL
CLASS III IMPACTS: ADVERSE, BUT NOT SIGNIFICANT		
<p>Water Resources</p> <p>The proposed Phase I facilities at Foster Park would involve minor grading and excavation at well pads and along pipeline routes in Foster Park. Areas disturbed during construction could be subject to potential water erosion if there is a significant rain event during or after the grading and installation of the wells and pipes. Soils eroded from the work areas could enter the river if there was sufficient rainfall and runoff. This impact is less than significant because the City will prepare a stormwater and erosion control plan that will include Best Management Practices to reduce exposure of soils to rainfall, and to prevent off site sedimentation. However, additional protection is recommended as described in Mitigation Measure W-1.</p>	<p>W-1. The Contractor's SWPPP and erosion control plan for Phase I and II work in and adjacent to the Ventura River shall specifically include Best Management Practices (BMPs) to reduce exposure of graded soils, excavated trenches, and stockpiles to rainfall; to prevent off-site sedimentation from upland construction work areas that could reach the Ventura River; and to prevent off-site sedimentation from riverbed work areas that could reach the live stream. BMPs shall include the following measures (among others):</p> <ul style="list-style-type: none"> - All work in the river shall occur during the period 1 April through 1 December to avoid rainfall and runoff. - To the extent feasible, all grading and excavation work outside the river channel shall occur during the period 1 April through 1 December to avoid rainfall. - In the event that work must occur during the rainfall period (1 December through 1 April), all stockpiles and exposed work areas shall be protected from forecasted rain events by the use of temporary coverings, as feasible. - BMPs shall be installed to prevent erosion from stockpiles and exposed work areas, including silt fences and straw bales surrounding the work area - As necessary, BMPs (such as temporary sediment basins) shall be installed to capture eroded materials from stockpiles and work areas that cannot be reasonably contained at the origin. 	<p>Less than significant</p>

TABLE ES-1

DESCRIPTION OF IMPACT BY ISSUE AREA	MITIGATION MEASURES	RESIDUAL IMPACT LEVEL
Water Resources Impact (Continued)	<p>Mitigation Measure W-1 (Continued)</p> <ul style="list-style-type: none"> - All reasonable measures shall be made to prevent the discharge of any turbid stormwater or sediment from the work areas to the Ventura River. - Following the installation of facilities on stream terraces above the river, the disturbed areas shall be landscaped with container plants, seeds, or turf to stabilize the soils and prevent erosion during the next winter rains. The plant/seed mix, planting density, and installation methods shall be determined based on the type of cover to be restored and site conditions. Disturbed areas north of Foster Park shall be restored with native herbs, grasses, shrubs, and trees. The City shall monitor the progress of the landscaping and native restoration, and ensure that it provides erosion protection during the subsequent winter. If necessary, additional erosion control BMPs (e.g., erosion control blankets) and supplemental landscaping shall be implemented if the initial efforts are not successful. 	Less than significant
Other work in the river channel includes the removal of Nye Well No. 2. The cumulative effect of this construction activity could cause increased erosion and sedimentation of the river from direct impingement on work areas in the channel, and post-construction stormwater runoff.	See Mitigation Measure W-1 above	Less than significant

TABLE ES-1

DESCRIPTION OF IMPACT BY ISSUE AREA	MITIGATION MEASURES	RESIDUAL IMPACT LEVEL
<p>Destruction of Nye Well No. 1A would involve the use of earthmoving equipment and concrete within 15 feet of the river bank. This work is not expected to cause a significant impact on water quality in the Ventura River due to the application of BMPs in the required SWPPP for the work at and near the river. Hence, this impact is considered adverse, but less than significant. Mitigation Measure W-1 provides additional guidance on reducing stormwater impacts during and after construction of Phase I facilities in and near the Ventura River, including the removal of Nye Well No. 1A.</p>	<p>W-2. A focused SWPPP and erosion control plan shall be prepared for the destruction of Nye Well No. 1A due to its proximity to the river. It shall include the following elements:</p> <ul style="list-style-type: none"> - The work shall only occur during the period 1 April through 1 December to avoid rainfall, <u>if feasible</u> - All temporary stockpiles shall be placed at least 50 feet from the top of bank - A silt fence and exclusion fence shall be placed 5 feet from the top of bank to prevent entry by equipment or personnel during the work. - The Contractor must take all reasonable measures to prevent the discharge of any turbid stormwater, sediment, water used or generated from the abandonment process, lubricants, and concrete from the work area to the Ventura River. - Any discharge of water used in the abandonment of the well must be directed to an upland area for dissipation of energy and removal of sediments or contaminants prior drainage to the river. Such discharges must be conducted with an approved NPDES permit from the Regional Water Quality Control Board. - Following the destruction of the well and well pad, the disturbed areas shall be landscaped with native riparian trees and shrubs to help stabilize the highly eroded bank at the site. A restoration plan shall be prepared that specifies the soil treatment, planting methods, plant palette, 3-year performance criteria, and a 3-year maintenance and monitoring program. The City shall monitor the progress of the restoration, and ensure that it provides erosion protection during the winter. If necessary, additional erosion control BMPs and supplemental landscaping shall be implemented if the initial efforts are not successful. - The post-abandonment grading shall establish a drainage pattern that does not exacerbate the current eroded conditions of the river bank at the well pad. 	<p>Less than significant</p>

TABLE ES-I

DESCRIPTION OF IMPACT BY ISSUE AREA	MITIGATION MEASURES	RESIDUAL IMPACT LEVEL
<p>Construction and drilling activities in and near Foster Park during Phases I and II, and work in the Ventura River during Phase II, would involve the use of concrete, fuels, drilling fluids, and lubricants (associated with construction equipment). Stormwater quality could be affected if there were an accidental spill that reached the Ventura River or the live stream. The contractor will be required to prepare a Storm Water Pollution Prevention Plan (SWPPP) and acquire coverage under the state's general construction stormwater permit. The SWPPP which must include measures to prevent accidental spills of fuels and concrete during construction. As such, any accidental spill would be localized and contained. Additional specific measures to be included in the plan to further reduce the likelihood of a spill and its impact are provided in Mitigation Measure W-3.</p>	<p>W-3. The Contractor's SWPPP and erosion control plan shall specifically include Best Management Practices (BMPs) to prevent discharge of construction materials, contaminants, washings, concrete, fuels, drilling fluids, and oils into the Ventura River. BMPs shall include the following measures (among others):</p> <ul style="list-style-type: none"> - All construction vehicles and equipment that enter the construction and grading areas will be properly maintained (off-site) to prevent leaks of fuel, oil and other vehicle fluids. - Conduct equipment and vehicle fueling off-site. If refueling is required at the project site, it will be done within a bermed area with an impervious surface to collect spilled fluids. No refueling shall occur in the river. - Prepare a spill prevention/spill response plan for the project site that includes training, equipment and procedures to address spills from equipment, stored fluids, drilling muds, and other materials. - Place all stored fuel, lubricants, paints and other construction liquids in secured and covered containers within a bermed area, outside the river channel. - Conduct any mixing and storage of concrete and mortar in contained areas. - Ensure that all equipment washing and major maintenance is prohibited at the project site, except for washdown of vehicles to remove dirt which must only occur in a bermed area outside the river channel. - Remove all refuse and excess material from the site as soon as possible. - Drilling fluids shall be conveyed, piped, stored, and processed in a closed system; no fluids shall be discharged to the environment. 	<p>Less than significant</p>

TABLE ES-1

DESCRIPTION OF IMPACT BY ISSUE AREA	MITIGATION MEASURES	RESIDUAL IMPACT LEVEL
<p>The discharge of groundwater to the Ventura River during well testing under both Phases I and II could affect water quality in the river, but would not cause a significant impact for the following reasons: (1) groundwater from the river alluvium (which is used for drinking water) exhibits high quality and does not contain pollutants; and (2) the City will need to acquire a Waste Discharge Requirement from the Regional Water Quality Control Board to discharge groundwater to the river. The permit will include conditions to ensure that no water quality standards would be exceeded, and that sediment and turbidity levels are not increased in the river during the discharge. Additional specific measures to be observed to further reduce the water quality impact of the temporary discharge are in Mitigation Measure W-4.</p>	<p>W-4. The temporary discharge of groundwater to the Ventura River during well testing shall be scheduled to occur outside the steelhead rearing season (1 May through 1 July) to avoid impacts to the quality, temperature, and flow conditions of water in pools at Foster Park. Water shall be discharged in such a manner as to avoid creating turbidity in the river flows and localized scouring. This may be accomplished through the use of energy dissipators, or finding natural off-channel swales to act as temporary discharge ponds. No water shall be directly discharged to pools or flows in the river that are continuous with the main flow.</p>	<p>Less than significant</p>
<p>The installation of the new wells at Foster Park under Phases I and II would slightly increase the 100-year flood base elevation. However, the increase would not be significant. In addition, the wells would not exacerbate current bank erosion problems along the Ventura River, as they will be designed to be inundated and scoured without a hardened levee or bank protection that would typically deflect flood flows. Overall, the proposed well layout and well pad maintenance and reconstruction after flood events would not have a significant impact on the hydraulic conditions in the river.</p>	<p>No mitigation required</p>	<p>Less than significant</p>
<p>A rock groin will be installed at Well No. 7 under <u>Phase II</u> to provide extra protection from bank erosion. Flood flows impinging upon the groin would be deflected. The impact on the hydraulic conditions of the river would be minor and less than significant because only very high and infrequent flows would impinge on the groin, and the deflect flows are not expected to cause any downstream bank erosion due to the great width of the river channel at this point.</p>	<p>No mitigation required</p>	<p>Less than significant</p>

TABLE ES-1

DESCRIPTION OF IMPACT BY ISSUE AREA	MITIGATION MEASURES	RESIDUAL IMPACT LEVEL
<p>There is a potential for accidental discharges of construction related pollutants to the river during the Phase II construction work at Foster Park. The SWPPP required for the work would include measures to prevent accidental spills of fuels and concrete during construction. Additional specific measures to be included in the plan to reduce the likelihood of a spill are provided in Mitigation Measure W-3.</p>	<p>See Mitigation Measure W-3 above.</p>	<p>Less than significant</p>
Biological Resources		
<p>Installation of three new wells in and near Foster Park would result in the permanent loss of non-native weedy vegetation at each location. In addition, the construction of the well pads, including excavation of a pit to construct the belowground concrete casing, would cause a temporary disturbance to the same type of vegetation that surrounds the well pad sites. The temporary disturbance and the permanent loss of these non-native vegetation types at each well site is considered an adverse, but less than significant impact because of the small area involved and the predominance of non-native weeds. Although the loss of vegetation at the well sites is not considered significant, the loss of vegetative cover, albeit non-native, can be offset by restoring temporarily disturbed areas and the well pads with native plants, as described in Mitigation Measure BIO-2.</p>	<p>BIO-2. The City shall prepare a post-construction habitat restoration plan that specifies the methods and materials to restore native plants to the areas disturbed during the installation of new facilities at and near Foster Park that result in the loss of both native and non-native habitats (excluding turf, landscaped and barren areas in Foster Park). The plan shall include pre-planting site treatment (such as weed eradication and soil preparation), establishing plants by seed and/or container plants, and a 3-year maintenance and monitoring program to ensure successful establishment of native plants that can persist under natural conditions and rainfall. All plants or seeds used for re-vegetation should be derived from local genetic stock, as available. The seed mix and application rate, species mix, and planting density shall be specified in the plan. All disturbed areas shall be prepared prior to re-vegetation by removing weeds, scarifying the soil surface, and returning topography to pre-project conditions. Native plants shall be planted in the first winter following completion of construction and irrigated as necessary to achieve the target growth and survival rates. This measure applies to areas temporarily disturbed during pipe installation and well pad construction, as well as to the side slopes of the well pads.</p>	<p>Less than significant</p>

TABLE ES-1

DESCRIPTION OF IMPACT BY ISSUE AREA	MITIGATION MEASURES	RESIDUAL IMPACT LEVEL
<p><i>Cultural Resources</i></p> <p>No prehistoric and historic archaeological sites are located at or adjacent to the work areas at the WTP site and Foster Park work areas. No impacts to prehistoric or historic archeological sites are anticipated. However, there is a slight probability that unknown prehistoric or historic deposits could be discovered during construction. Standard precautions will be implemented by the City to detect and protect unanticipated discoveries of archeological resources during construction.</p>	<p>CR-1. An archaeologist shall monitor brush clearance at Well No. 9 and along the proposed Phase II section of pipeline between the equestrian/bicycle trail and the eastern bank of the Ventura River.</p> <p>CR-2. An archaeologist shall provide a cultural resources orientation to construction workers associated with earth disturbing procedures at Foster Park. The orientation shall include a description of the type of cultural resources that may be encountered during construction and what steps are to be taken if such a find is unearthed.</p> <p>CR-3. An archaeologist shall be retained to monitor brush clearance and pipeline trenching within the Foster Park. No monitoring is warranted for work within the active river channel, well drilling or within the WTP site. The archaeologist shall have the power to temporarily halt or redirect project construction in the event that potentially significant cultural resources are exposed. Based on monitoring observations and the actual extent of project disturbance, the lead archaeologist shall have the authority to refine the monitoring requirements as appropriate (i.e., change to spot checks, reduce the area to be monitored) in consultation with the lead agency.</p> <p>CR-4. A monitoring report shall be prepared upon completion of construction and provided to the City and to the South Central Coast Information Clearinghouse. The report shall include locations monitored, the results of monitoring and a conclusion on whether the project resulted in any significant impacts to cultural resources.</p> <p>CR-5. In the event that archaeological resources are exposed during project construction, all earth disturbing work within the vicinity of find must be temporarily suspended or redirected until an archaeologist has evaluated the nature and significance of the find. After the find has been appropriately mitigated, work in the area may resume. A Chumash representative shall monitor any mitigation work associated with Native American cultural material.</p>	<p>Less than significant</p>

TABLE ES-I

DESCRIPTION OF IMPACT BY ISSUE AREA	MITIGATION MEASURES	RESIDUAL IMPACT LEVEL
<i>Cultural resources continued</i>	CR-6. If human remains are unearthed, State Health and Safety Code Section 7050.5 requires that no further disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the Native American Heritage Commission. The Native American Heritage Commission shall then identify the person or persons it believes to be most likely descended from the deceased Native American. The most likely descendent may make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in Public Resources Code Section 5097.98.	Less than significant
Recreation		
Construction activities at the WTP site will not adversely affect the use of the Ventura River Trail because construction work will not occur outside the limits of the WTP site. Trail users will notice the construction activity and noise at the WTP site when passing by; however, this impact would be considered a minor distraction and a less than significant impact.	No mitigation required	Less than significant
Construction activities in the park will cause an inconvenience to park users. There will be construction noise, traffic, dust, and human activity during the weekdays which will cause a distraction to park users. The park will remain open during all Phase I and II construction activities. However, portions of the park will be temporarily closed during certain construction work. None of the key amenities of the park will be removed from service. Impacts to park users are considered an adverse, but less than significant impact because the impacts would be temporary and localized in the park, and because the City has incorporated measures to minimize the impacts.	No mitigation required	Less than significant

TABLE ES-1

DESCRIPTION OF IMPACT BY ISSUE AREA	MITIGATION MEASURES	RESIDUAL IMPACT LEVEL
<p><i>Air Quality</i></p> <p>Construction activities at the WTP site and Foster Park under Phases I and II would result in temporary emissions of pollutants from construction equipment and vehicles. No violations of state and federal air quality standards are anticipated. However, the City will implement mitigation measures to reduce pollutant emissions to the extent feasible.</p>	<p>AQ-1. To minimize NO_x emissions, the following measures shall be implemented for each piece of heavy-duty diesel construction equipment, including the engines powering the drill rig, slurry pumps, and pipe rammer:</p> <ul style="list-style-type: none"> • The engine size of construction equipment shall be the minimum practical size. • Heavy-duty diesel-powered construction equipment manufactured after 1996 (with federally mandated clean diesel engines) should be utilized wherever feasible. • The number of construction equipment operating simultaneously shall be minimized through efficient management practices to ensure that the smallest number is operating at any one time. • Construction equipment operating onsite shall be equipped with two to four degree engine timing retard or precombustion chamber engines. • Catalytic converters shall be installed on gasoline-powered equipment. • Construction equipment engines shall be maintained in good condition and in proper tune per manufacturers' specifications ▪ Construction equipment idling time shall be minimized to the extent feasible 	<p>Less than significant</p>

TABLE ES-1

DESCRIPTION OF IMPACT BY ISSUE AREA	MITIGATION MEASURES	RESIDUAL IMPACT LEVEL
<i>Air quality continued</i>	<p>AQ-2. To minimize dust/ PM₁₀ emissions, the following measures shall be implemented:</p> <ul style="list-style-type: none"> • After clearing, grading, earth moving or excavation is complete, the disturbed area must be treated with watering, or revegetating, or by spreading soil binders until the area is paved or otherwise developed so that dust generation will not occur. • During construction, use water trucks or sprinkler systems to keep all areas of vehicle movement damp enough to prevent dust from leaving the site. At a minimum, this shall include wetting down such areas in the late morning and after work is completed for the day. Increased watering frequency shall be required whenever the wind speed exceeds 15 mph. Reclaimed water shall be used whenever possible. • Minimize the amount of disturbed area and reduce on site vehicle speeds to 15 miles per hour or less. • Gravel pads should be installed at all access points to prevent tracking of mud onto public roads. • If importation, exportation, and stockpiling of fill material is involved, soil stockpiled for more than two days shall be covered, kept moist, or treated with soil binders to prevent dust generation. • Trucks transporting fill material to and from the site shall be tarped, unless the material has been wetted or has sufficient moisture to prevent wind erosion. • Dust control requirements shall be shown on all grading plans. 	Less than significant

TABLE ES-1

DESCRIPTION OF IMPACT BY ISSUE AREA	MITIGATION MEASURES	RESIDUAL IMPACT LEVEL
<p><i>Visual Resources</i></p> <p>The proposed wells to be installed in Foster Park under Phase I will be located outside the public use areas of the park. The well locations are remote and would not be visible to park users or to travelers on Highway 33. They may be visible to users of the Ventura River Trail, but such views would be partially obscured and very brief. The proposed wells would not represent a new visual element to the park because wells have been present in the park for decades. Installation of the new pipes in the park would cause short-term visual impacts to the park. The pipeline corridor would be restored to pre-construction conditions, including replacement of landscaping and turf. Hence, no long-term visual impact would occur.</p>	No mitigation required.	Less than significant

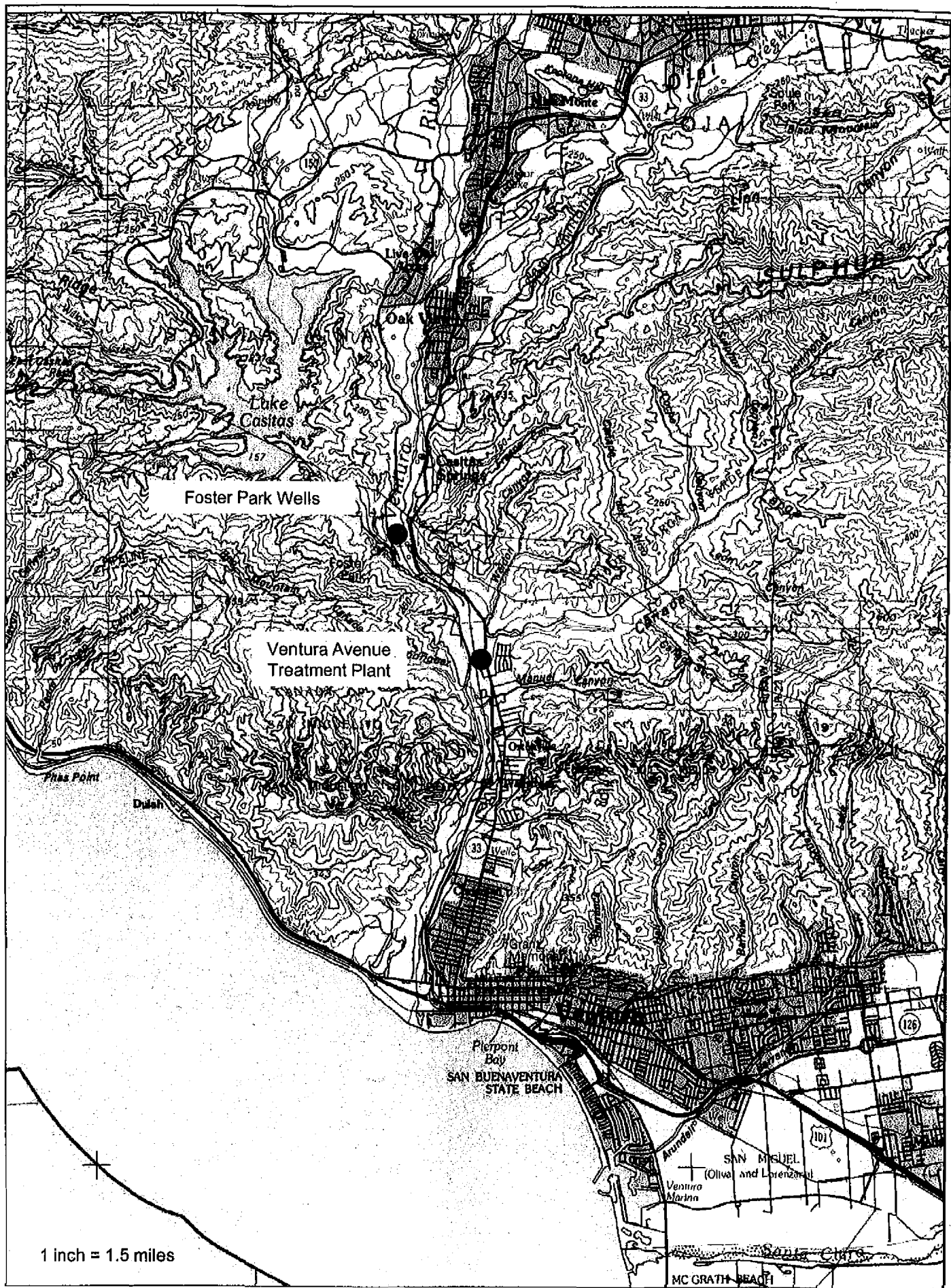


Figure 1. Locations of Project Sites

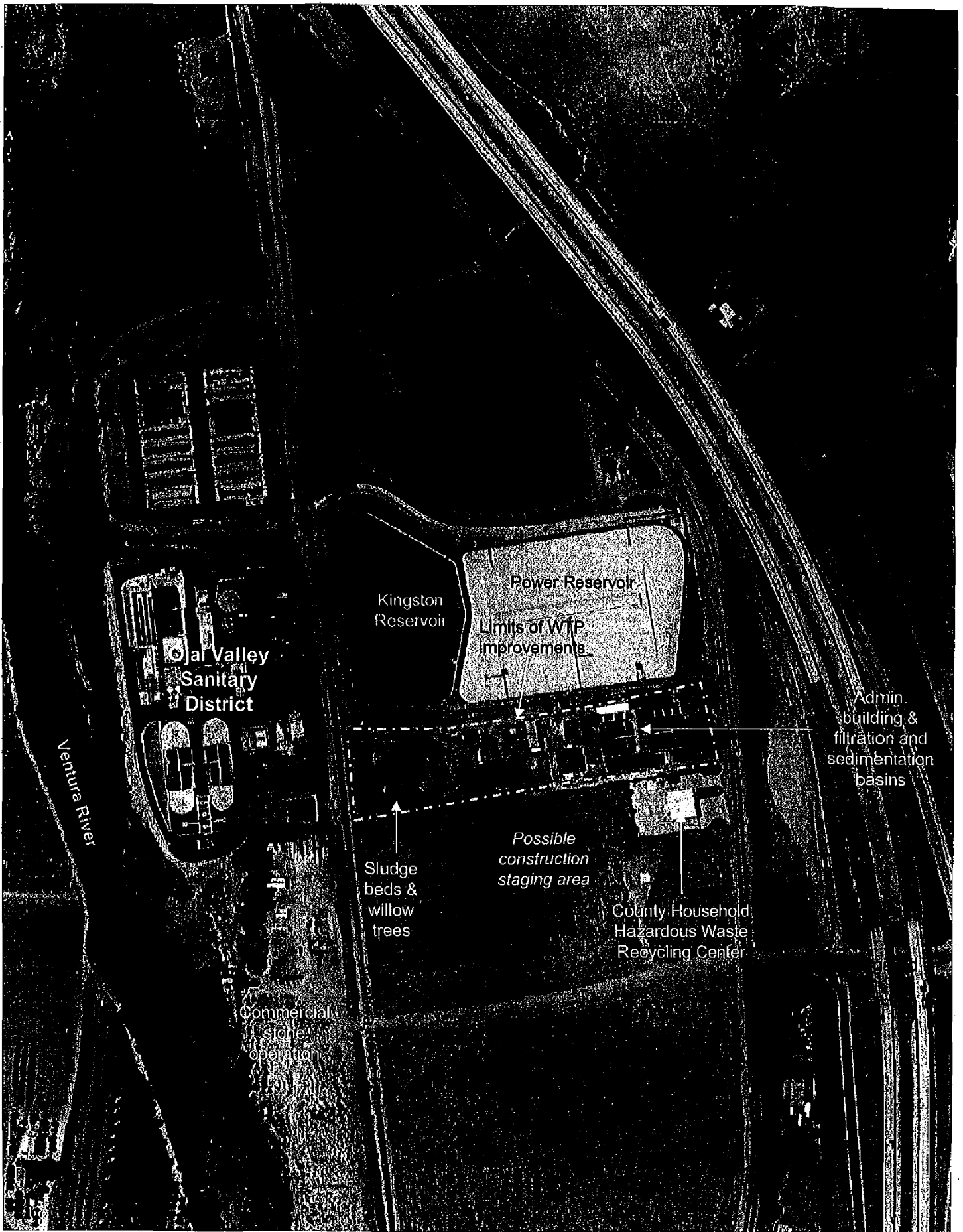


Figure 2. Overview of the Water Treatment Plant Site

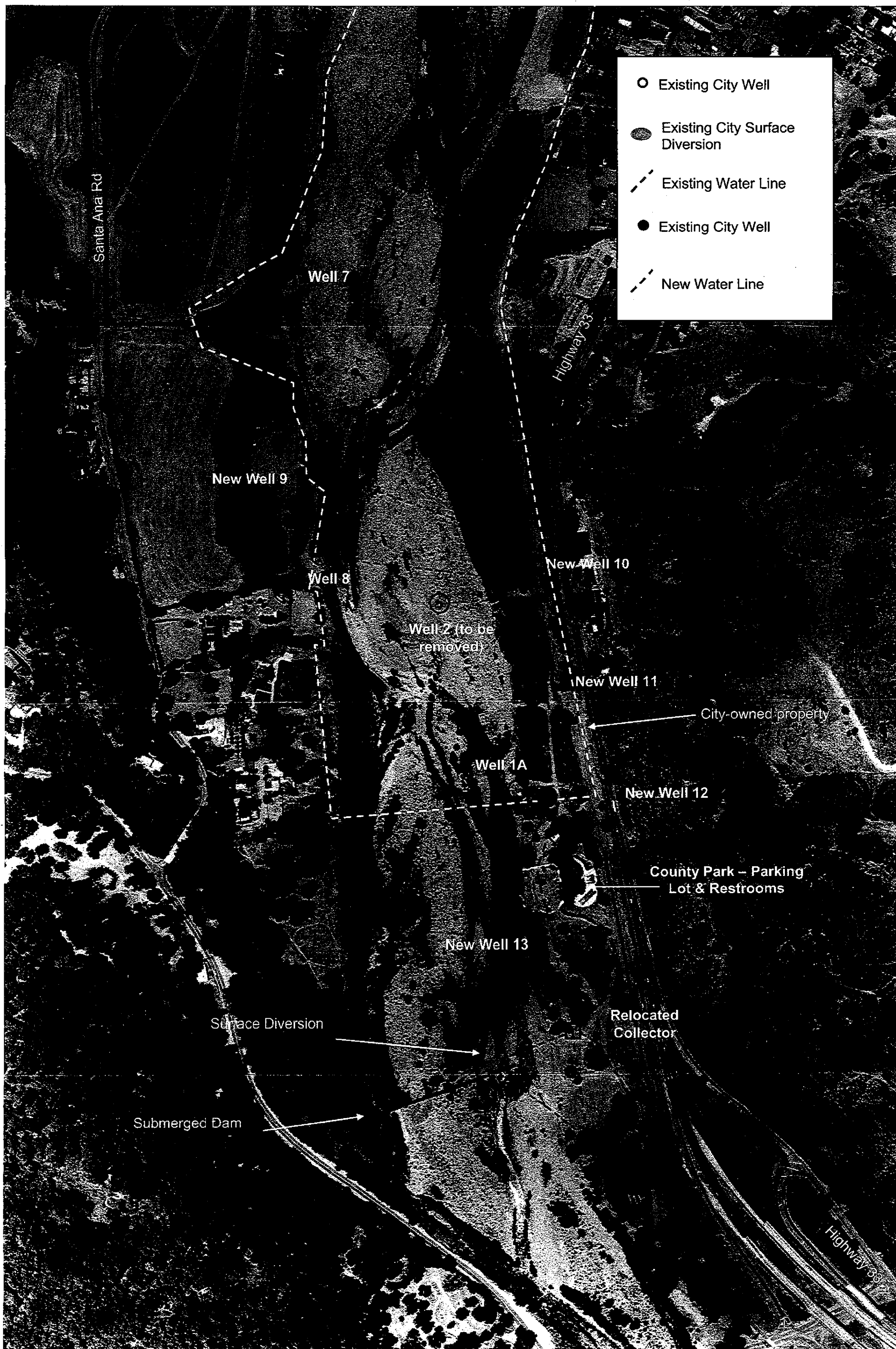


Figure 3. Existing and Proposed Facilities at Foster Park

Final Environmental Impact Report
Avenue Water Treatment Plant/
Foster Park Facility Improvements Project

SECTION 2

NOTICE OF COMPLETION

NOTICE OF AVAILABILITY

LIST OF RECIPIENTS

RECORD OF DECEMBER 17, 2003 PUBLIC MEETING

Note: The Draft EIR was issued for a 45-day public review on December 1, 2003. A public Notice of Availability (NOA) was placed in the Ventura Star. A public meeting to receive comments on the Draft EIR was conducted on December 17, 2003. There were no attendees or comments. The 45-day comment period ended on January 14, 2004.

Copies of the Draft EIR were placed at the E.P. Foster Branch, Avenue Branch, and Wright Branch libraries. Sixteen copies of the Draft EIR were mailed to the State Clearinghouse at the Governor's Office of Planning and Research for distribution to state agencies. Copies of the Draft EIR and NOA were mailed to the following public agencies:

- Federal Emergency Management Agency
- US Army Corps of Engineers
- NOAA Fisheries
- US Fish and Wildlife Service
- California Department of Fish and Game (various individuals)
- Los Angeles Regional Water Quality Control Board
- State Historic Preservation Office
- State Department of Health Services
- County of Ventura (various departments)
- Casitas Municipal Water District
- Ojai Basin Groundwater Management Agency
- Ventura River County Water Agency
- Ojai Valley Sanitary District
- Mieners Oaks County Water District
- Southern California Water Company

Copies were also mailed to the following environmental and community organizations: California Native Plant Society, Environmental Coalition, and Matilija Coalition. Thirty seven Notices of Availability were mailed to various other public agencies, community organizations, and environmental groups with interest in issues in the Ventura River watershed.

NOTICE OF COMPLETION**Form A**

Mail to: State Clearinghouse, 1400 Tenth Street, Sacramento, CA 95814

916-445-0613

See NOTE below

SCH #

Project Title: Avenue Water Treatment Plant/Foster Park Facility Improvements ProjectLead Agency: City of San Buenaventura 501 Poli Street Ventura CA 93001 County VenturaContact Person: Paul Calderwood Phone: (805) 654-7727**Project Location**County: Ventura City/Nearest Community: VenturaCross Streets: Cañada Larga Road and Ventura AvenueZip: 93001 Total Acres: 12.54Assessors Parcel No. 063-0-040-025 Section: Twp. Range: Base: Within 2 Miles: State Hwy#: U.S. 33 Waterways: Ventura RiverAirports: Railways: Schools: **Document Type**

CEQA:	<input type="checkbox"/> NOP	<input type="checkbox"/> Supplement/Subsequent	NEPA:	<input type="checkbox"/> NOI	OTHER:	<input checked="" type="checkbox"/> Joint Document
	<input type="checkbox"/> Early Cons	<input type="checkbox"/> EIR (Prior SCH No.) <u></u>		<input type="checkbox"/> EA		<input type="checkbox"/> Final Document
	<input type="checkbox"/> Neg Dec	<input type="checkbox"/> Other <u></u>		<input type="checkbox"/> Draft EIS		<input type="checkbox"/> Other
	<input checked="" type="checkbox"/> Draft EIR			<input type="checkbox"/> FONSI		

Local Action Type

<input type="checkbox"/> General Plan Update	<input type="checkbox"/> Specific Plan	<input type="checkbox"/> Rezone	<input type="checkbox"/> Annexation
<input type="checkbox"/> General Plan Amendment	<input type="checkbox"/> Master Plan	<input type="checkbox"/> Prezone	<input type="checkbox"/> Redevelopment
<input type="checkbox"/> General Plan Element	<input type="checkbox"/> Planned Unit Development	<input type="checkbox"/> Use Permit	<input type="checkbox"/> Coastal Permit
<input type="checkbox"/> Community Plan	<input type="checkbox"/> Site Plan	<input type="checkbox"/> Land Division (Subdivision,	<input checked="" type="checkbox"/> Other
<input type="checkbox"/> Parcel Map, Tract Map, etc.)			

Development Type

<input type="checkbox"/> Residential: Units <u></u> Acres <u></u>	Water Facilities: Type <u></u> MGD
<input type="checkbox"/> Office: Sq. ft. <u></u> Acres <u></u> Employees <u></u>	Transportation: Type <u></u>
<input type="checkbox"/> Commercial: Sq. ft. <u></u> Acres <u></u> Employees <u></u>	Mining: Type <u></u>
<input type="checkbox"/> Industrial: Sq. ft. <u></u> Acres <u></u> Employees <u></u>	Power: Type <u></u> Watts
<input type="checkbox"/> Educational <u></u>	Waste Treatment: Type <u></u>
<input checked="" type="checkbox"/> Recreational <u></u>	Hazardous Waste Type <u></u>
	Other: <u></u>

Project Issues Discussed in Document

<input checked="" type="checkbox"/> Aesthetic/Visual	<input type="checkbox"/> Flood Plain/Flooding	<input type="checkbox"/> Schools/Universities	<input checked="" type="checkbox"/> Water Quality
<input type="checkbox"/> Agricultural Land	<input type="checkbox"/> Forest Land/Fire Hazard	<input type="checkbox"/> Septic Systems	<input type="checkbox"/> Water Supply/Groundwater
<input checked="" type="checkbox"/> Air Quality	<input checked="" type="checkbox"/> Geologic/Seismic	<input type="checkbox"/> Sewer Capacity	<input checked="" type="checkbox"/> Wetland/Riparian
<input checked="" type="checkbox"/> Archeological/Historical	<input type="checkbox"/> Minerals	<input type="checkbox"/> Soil Erosion/Compaction/Grading	<input checked="" type="checkbox"/> Wildlife
<input type="checkbox"/> Coastal Zone	<input checked="" type="checkbox"/> Noise	<input type="checkbox"/> Solid Waste	<input checked="" type="checkbox"/> Growth Inducing
<input type="checkbox"/> Drainage/Absorption	<input type="checkbox"/> Population/Housing Balance	<input type="checkbox"/> Toxic/Hazardous	<input type="checkbox"/> Land Use
<input type="checkbox"/> Economic/Jobs	<input type="checkbox"/> Public Services/Facilities	<input checked="" type="checkbox"/> Traffic/Circulation	<input checked="" type="checkbox"/> Cumulative Effects
<input type="checkbox"/> Fiscal	<input checked="" type="checkbox"/> Recreation/Parks	<input checked="" type="checkbox"/> Vegetation	<input checked="" type="checkbox"/> Other <u>Hazards</u>

Present Land Use/Zoning/General Plan Use

Present Land Use – Public Utility Present Zoning – R-1-1AC Present General Plan Use – General Industrial

Project Description

As proposed the project would involve the replacement of the Avenue Water Treatment Plant (WTP) conventional filtration process with membrane filtration. The purpose of these proposed improvements are to modify or replace existing WTP and Foster Park facilities to provide up to 15 million gallons per day of reliable source water and treatment capacity and to treat the source water to meet the latest requirements of the Safe Drinking Water Act. Additionally, the proposed project would involve improvements to the Foster Park Facilities to include new water supply wells and pipelines, additional water supply monitoring, rehabilitation of existing wells and demolition/abandonment of structures in the active Ventura River channel. Environmental issues to be analyzed in the DEIR include the following: air quality; biological resources; threatened and endangered species; cultural resources; hazards; noise; public services; utilities and service systems, water quality; transportation and circulation; and water.

Environmental issues to be analyzed in the DEIR include the following: air quality; biological resources; threatened and endangered species, cultural resources; hazards; noise; public services; utilities and service systems, water quality; transportation and circulation; and water.

Note: Clearinghouse will assign identification numbers for all new projects. If a SCH number already exists for a project (e.g. from a Notice of Preparation or previous draft document) please fill it in. Revised Oct. 1989

Reviewing Agencies Checklist

KEY

S = Document sent by lead agency

X = Document sent by SCH

T = Suggested distribution

Resources Agency

- ☐ Boating & Waterways
- ☐ Coastal Commission
- ☐ Coastal Conservancy

Environmental Affairs

- ☐ Colorado River Board
- ☐ Conservation
- ☐ Fish & Game
- ☐ Forestry
- ☐ Office of Historic Preservation
- ☐ Parks & Recreation
- ☐ Reclamation
- ☐ S.F. Bay Conservation & Development Commission
- ☐ Water Resources (DWR)

- ☐ Air Resources Board
- ☐ APCD/AQMD
- ☐ California Waste Management Board
- ☐ SWRCB: Clean Water Grants
- ☐ SWRCB: Delta Unit
- ☐ SWRCB: Water Quality
- ☐ SWRCB: Water Rights
- ☐ Regional WQCB # _____

Business, Transportation & Housing

Youth & Adult Corrections

- ☐ Corrections

Independent Commissions & Offices

- ☐ Aeronautics
- ☐ California Highway Patrol
- ☐ CALTRANS District # _____
- ☐ Department of Transportation Planning (headquarters)
- ☐ Housing & Community Development
- ☐ Food & Agriculture

- ☐ Energy Commission
- ☐ Native American Heritage Commission
- ☐ Public Utilities Commission
- ☐ Santa Monica Mountains Conservancy
- ☐ State Lands Commission
- ☐ Tahoe Regional Planning Agency

Health & Welfare

- ☐ Health Services _____

State & Consumer Services

- ☐ General Services
- ☐ OLA (Schools)

- ☐ Other _____

Public Review Period (to be filled in by lead agency)

Starting Date December 1, 2003

Ending Date January 14, 2004

Signature 

Date November 25, 2003

Lead Agency (Complete if applicable):

Consulting Firm: City of San Buenaventura
Address: 501 Poli Street
City/State/Zip: Ventura CA 93001
Contact: Paul Calderwood
Phone: (805) 654-7727

For SCH Use Only:

Date Received at SCH _____
Date Review Starts _____
Date to Agencies _____
Date to SCH _____
Clearance Date _____

Applicant: City of San Buenaventura
Address: 501 Poli Street
City/State/Zip: Ventura CA 93001
Phone: (805) 654-7894

NOTES:

**NOTICE OF AVAILABILITY
DRAFT ENVIRONMENTAL
IMPACT REPORT (DEIR)
NO. EIR – 2411
State Clearinghouse #**

PROJECT TITLE: Avenue Water Treatment Plant/Foster Park Facility
Improvements Project

PROJECT APPLICANT: City of San Buenaventura
Engineering Division
501 Poli Street
Ventura, CA 93001

PROJECT LOCATION: Cañada Larga Road and Ventura Avenue

PROJECT DESCRIPTION: As proposed the project would involve the replacement of the Avenue Water Treatment Plant (WTP) conventional filtration process with membrane filtration. The purpose of these proposed improvements are to modify or replace existing WTP and Foster Park facilities to provide up to 15 million gallons per day of reliable source water and treatment capacity and to treat the source water to meet the latest requirements of the Safe Drinking Water Act. Additionally, the proposed project would involve improvements to the Foster Park Facilities to include new water supply wells and pipelines, additional water supply monitoring, rehabilitation of existing wells and demolition/abandonment of structures in the active Ventura River channel. Environmental issues to be analyzed in the DEIR include the following: air quality; biological resources; threatened and endangered species, cultural resources; hazards; noise; public services; utilities and service systems, water quality; transportation and circulation; and water.

PUBLIC HEARING: A public hearing will be held to receive public comments (written and oral) on the Avenue Water Treatment Plant/Foster Park Facility Improvements Project Draft Environmental Impact Report. **The public hearing will be held on December 17, 2003, from 7:00 PM to 9:00 PM., and will be held at the following location:**

**City of Ventura
Atrium
501 Poli Street
Ventura, CA 93001**

LEAD AGENCY: City of Ventura
Planning Division
501 Poli Street
Ventura, CA 93001

A COPY OF THE DEIR IS AVIALBLE AT THE FOLLOWING LOCATIONS:

City of Ventura
Planning Division
501 Poli Street
Room 117
Ventura, CA 93110

H.P. Wright Library
57 Day Road
Ventura, Ca 93003

E.P. Foster Library
651 East Main Street
Ventura, CA 93001

Avenue Branch Library
555 North Ventura Avenue
Ventura, CA 93001

The public comment period is December 1, 2003 through January 14, 2004.

FOR MORE INFORMATION CONTACT: Raul Calderwood, Senior Planner
(805) 654-7727

PUBLICATION DATE: December 1, 2003

**DEIR / NOA DISTRIBUTION LIST
FOR**

**AVENUE WATER TREATMENT PLANT / FOSTER PARK FACILITY
IMPROVEMENTS PROJECT**

Copies of DEIRs

The following will receive DEIRs and NOAs:

Frank Bennett, Southern California Water Co.
Harry, Bodell, Ojai Basin Groundwater Management Agency
Matt Bryant, Ventura River County Water District
~~John Correa~~ Russ Baggerly, Ojai Valley Sanitary District
John Johnson, Casitas Municipal Water District
Ron Singleton, Meiners Oaks County Water District
Mark Capelli, National Marine Fisheries Service (NMFS)
~~NMFS (Longbeach location)~~
Ms. Katie Perry, Steelhead Specialist (DFG)
Theresa Lubin, County of Ventura
Thomas E. Malley, Esq., rep of Casitas Mutual Water Company
- Avenue Branch Library
County of Ventura (3 Copies)
E.P. Foster Branch Library
Governor's Office of Planning and Research
HP Wright Branch Library
California Native Plant Society
Antal Svijj, US Army Corps of Engineers
Jen Lechuga, US Fish and Wildlife Service
Ventura County Flood Control District
Ms. Mary Larson, Dept. of Fish and Game
Dennis McEwan, Dept. of Fish and Game
California Regional Water Quality Control
Environmental Coalition
Paul Jenkins, Matilija Coalition
State Historic Preservation Office (SHPO)
Federal Emergency Management Agency (FEMA)
Kennedy / Jenks Consultants
Fugro West
16 copies to State Clearinghouse (per DHS SRF loan requirement)
8 copies to DHS Environmental Review Unit (per DHS SRF loan requirement)
10 copies for City Staff and Engineering File

65 Copies Total

NOAs Only

The following will receive a Notice of Availability only:

Friends of the Ventura River
League of Women Voters
Local Agency Formation Commission
Owl Clan Consultants
Sierra Club
So. California Association of Gov.
Surfrider Foundation
United Water Conservation District
Ventura County Organization of Governments
Ventureano Canaliano Chumash c/o Santa Ynez Tribal Elders
Westside Community Council, Mike Del Dosso
Ventura County Archaeological Society
Audubon Society
California Coastal Commission, South Central Coast Area Office
California Trout
Caltrants District 7, Environmental Section
Candelaria American Indian Council
Clerk of the Board of Supervisors, County of Ventura
Environmental Defense Center
Butch Britt, County of Ventura Trans. Dept.
Pete Kaiser, County of Ventura Solid Waste, Division L-1650
Pam Lindsey, Ventura County Flood Control Watershed Management District
Dan Singer, City of Ojai
Terry Maughmer, Southern California Water Co.
Jeff Pratt, County of Ventura Flood Control Watershed Management District
Ron Sheets, Ojai Valley Sanitary District
~~Maeton-Freel~~ Steve Meyer, US Forest Service (Los Padres National Forrest)
Margaret Tauzer, National Marine Fisheries Service
Donna Toth, US Forest Service
Morgan Wehtje, Department of Fish and Game
Jim Edmondson, California Trout
Virginia Gardener, California Dept. of Parks and Rec
David Young, US Bureau of Rec
Martin Potter, Dept of Fish & Game
Chris Dellith, US Fish & Wildlife Service
Maurice Cardenas, California Department of Fish and Game

**PUBLIC HEARING MINUTES FOR
AVENUE WATER TREATMENT PLANT / FOSTER PARK FACILITY
IMPROVEMENTS PROJECT DRAFT ENVIRONMENTAL IMPACT
REPORT**

December 17, 2003

1. The public hearing convened at 7:00 P.M. on December 17, 2003 in the Santa Cruz Conference Room located at 501 Poli Street, Ventura, CA 93001.
2. Persons present were as follows:
 - Joe McDermott, Senior Civil Engineer and Project Engineer for the City of Ventura
 - John Gray, Manager of Environmental Services for URS Corporation (City's Environmental Consultant for the Project)
 - Jim Passanisi, Water Superintendant for the City of Ventura
 - Karen Waln, Management Analyst for the City of Ventura
 - Paul Calderwood, Hearing Chair and Senior Planner for the City of Ventura
3. At 7:00 and at 7:15 P.M., the Atrium at City Hall was visually checked to see if persons from the public showed at the wrong location. Signs were posted in the Atrium before the meeting noting the changed location for the public hearing. There was another meeting at the Atrium location. Persons at that meeting were aware of the changed location for the subject public hearing and were prepared to inform persons of the change.
4. No persons from the public showed and the meeting was adjourned at 7:15 P.M.

Final Environmental Impact Report
Avenue Water Treatment Plant/
Foster Park Facility Improvements Project

SECTION 3

LETTERS OF COMMENTS

1. Governor's Office of Planning & Research, State Clearinghouse (no comments from state agencies)
2. Caltrans, District 7
3. Southern California Association of Governments
4. Ventura County, Public Works Agency, Transportation Department
5. NOAA Fisheries Services (dated March 4, 2004, 50 days after end of the public comment period)
6. Environmental Coalition (dated March 22, 2004, 68 days after the end of the public comment period)

RESPONSES TO COMMENTS



Arnold
Schwarzenegger
Governor

STATE OF CALIFORNIA

Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Jan Boel
Acting Deputy
Director

RECEIVED

JAN 20 2004

PLANNING DIV.

January 15, 2004

Paul Calderwood
City of San Buenaventura
501 Poli Street
Ventura, CA 93001

Subject: Avenue Water Treatment Plant/Foster Park Facility Improvement Project
SCH#: 2003121014

Dear Paul Calderwood:

The State Clearinghouse submitted the above named Negative Declaration to selected state agencies for review. The review period closed on January 14, 2004, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Terry Roberts
Director, State Clearinghouse

**Document Details Report
State Clearinghouse Data Base**

SCH# 2003121014
Project Title Avenue Water Treatment Plant/Foster Park Facility Improvement Project
Lead Agency San Buenaventura, City of

Type Neg Negative Declaration

Description As proposed the project would involve the replacement of the Ave. Water Treatment Plant (WTP) conventional filtration process with membrane filtration. The purpose of these proposed improvements are to modify or replace existing WTP and Foster Park facilities to provide up to 15 million gallons per day of reliable source water and treatment capacity and to treat the source water to meet the latest requirements of the Safe Drinking Water Act. Additionally, the proposed project would involve improvements to the Foster Park Facilities to include new water supply wells and pipelines, additional water supply monitoring, rehabilitation of existing wells and demolition/abandonment of structures in the active Ventura River channel. Environmental issues to be analyzed in the DEIR include the following: air quality; biological systems, water quality; transportation and circulation; and water.

Lead Agency Contact

Name Paul Calderwood
Agency City of San Buenaventura
Phone 805 854 7727 **Fax**
email
Address 501 Poli Street
City Ventura **State** CA **Zip** 93001

Project Location

County Ventura
City Ventura
Region
Cross Streets Cañada Larga Rd and Ventura Ave.
Parcel No. 063 0 040 025
Township **Range** **Section** **Base**

Proximity to:

Highways US33
Airports
Railways
Waterways
Schools
Land Use Public Utility - R1-1AC/General Industrial

Project Issues Aesthetic/Visual; Air Quality; Archaeologic-Historic; Cumulative Effects; Geologic/Seismic; Growth Inducing; Noise; Other Issues; Recreation/Parks; Traffic/Circulation; Vegetation; Water Quality; Wetland/Riparian; Wildlife

Reviewing Agencies Resources Agency; California Coastal Commission; Department of Fish and Game, Region 5; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; Caltrans, District 7; Department of Health Services; State Water Resources Control Board, Clean Water Program; State Water Resources Control Board, Division of Water Quality; State Water Resources Control Board, Division of Water Rights; Regional Water Quality Control Board, Region 4; Native American Heritage Commission; State Lands Commission

Date Received 12/01/2003 **Start of Review** 12/01/2003 **End of Review** 01/14/2004

DEPARTMENT OF TRANSPORTATION
DISTRICT 7, REGIONAL PLANNING
IGR/CEQA BRANCH
120 SO. SPRING ST.
LOS ANGELES, CA 90012
PHONE (213) 897-6536
FAX (213) 897-1337
E-Mail: NersesYerjanian@dot.ca.gov



RECEIVED
DEC 15 2003
PLANNING DIV.

*Flex your power!
Be energy efficient!*

Mr. Paul Calderwood
Planning Department
City of San Buenaventura
501 Poli St.
Ventura, CA. 93001

IGR/CEQA # 031216NY
DEIR/Avenue Water Treatment Plant
SCH#2003121014
VEN/33/4.49

December 11, 2003


Dear Mr. Calderwood:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the proposed Avenue Water Treatment Plant and related Wells project.

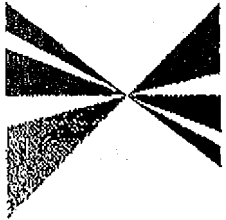
We would like to remind you that any transportation of heavy construction equipment and/or materials which requires the use of oversized-transport vehicles on State highways will require a Caltrans transportation permit. We recommend that large size truck trips be limited to off-peak commute periods.

If you have any questions regarding this response, please call the Project Engineer/Coordinator Mr. Yerjanian at (213) 897-6536 and refer to IGR/CEQA # 031216NY.

Sincerely,


STEPHEN J. BUSWELL
IGR/CEQA Branch Chief
Transportation Planning Office
Caltrans, District 7

SOUTHERN CALIFORNIA

ASSOCIATION of
GOVERNMENTS

Main Office

818 West Seventh Street

12th Floor

Los Angeles, California

90017-3435

(213) 236-1800

(213) 236-1825

www.scag.ca.gov

Offices: President: Mayra Ruiz-Perez, Brea • First
Vice President: Chairmember: Ron Roberts,
Torrance • Second Vice President: Supervisor
Mark Kuller, Imperial • Past President:
Superintendent Ronald Bates, Los Alamitos

Imperial County: Hank Kuiper, Imperial County •
Jo Shields, Bonville

Los Angeles County: Yvonne Brathwaite Burke,
Los Angeles County • Lev Yatskovsky, Los Angeles
County • Mahan Andrews, Tustin • Harry
Raisman, San Gabriel • Paul Bowers, Castille •
Tony Cardenas, Los Angeles • Margaret Clark,
Rosemead • Gene Daniels, Paramount • Mike
Bispenza, Palmdale • Judy Dunlap, Inglewood •
Eric Garrett, Los Angeles • Wendy Gruel, Los
Angeles • Frank Grunle, Cudahy • James Hahn,
Los Angeles • Janice Hahn, Los Angeles • Sandra
Jacobs, El Segundo • Tom LaRue, Los Angeles •
Honore Lowenthal, Long Beach • Martin Luciani,
Los Angeles • Keith McCarthy, Downey • Llewellyn
Miller, Claremont • Cindy Miskowski, Los
Angeles • Paul Novak, Tustin • Para
O'Connor, Santa Monica • Alex Pandia, Los
Angeles • Ronald Pines, Los Angeles • Ian Price,
Los Angeles • Braden Prou, Pico Rivera • Ed
Reyes, Los Angeles • Greg Smith, Los Angeles •
Dick Stanford, Azusa • Tom Sykes, Walnut • Paul
Tribel, Azusa • Sidney Tyle, La Pasadena •
Teresa Reyes Ortega, Long Beach • Antonio
Villanueva, Los Angeles • Dennis Washburn,
Calabasas • Jack Weiss, Los Angeles • Bob
Wasserman, Glendale • Dennis P. Zine, Los Angeles

Orange County: Chris Hodge, Orange County • Ron
Santos, Los Alamitos • Art Brown, Buena Park • Lou
Annas, Tustin • Richard Chavez, Anaheim • Debbie
Cook, Huntington Beach • Cathryn Drayton,
Laguna Hills • Richard Dixon, Lake Forest • Alka
Duke, La Habra • Bev Perry, Brea • Tom Ridgeway,
Huntington Beach

Riverside County: Marlene Ashley, Riverside
County • Ron Liversidge, Riverside • Jan Miller,
Corona • Greg Potts, Cathedral City • Stan Roberts,
Imperial • Craig White, Moreno Valley

San Bernardino County: Paul Biane, San
Bernardino County • Bill Alexander, Rancho
Cajon • Frank O'Connell, Town of Apple
Valley • Lawrence Dale, Barstow • Lee Ann Harris,
Grand Terrace • Susan Longville, San Bernardino •
Gary Ditt, Ontario • Deborah Robinson, Rialto

Ventura County: Judy Mikels, Ventura County •
Glen Reuter, Santa Valley • Carl McWhorter, San
Bernardino • Tom Young, Port Huether

Riverside County Transportation Commissioner
Robin Lowe, Hemet

Ventura County Transportation Commissioner Bill
Davis, Santa Valley

Printed on Recycled Paper

Post-it® Fax Note	7671	Date	1/13	# of pages	2
To	John Gray	From	Dennis Mackay		
Co./Dept.		Co.	City of Ventura		
Phone #		Phone #	(805) 658-4721		
Fax #	(805) 964-6259	Fax #			

January 7, 2004

Mr. Paul Calderwood
Senior Planner
City of Ventura, Planning Division
501 Poll Street
Ventura, CA 93001

RECEIVED
JAN 12 2004
PLANNING DIV.

RE: SCAG Clearinghouse No. 1 20030680 Avenue Water Treatment
Plant/Foster Park Facility Improvements Project

Dear Mr. Calderwood:

Thank you for submitting the **Avenue Water Treatment Plant/Foster Park Facility Improvements Project** for review and comment. As areawide clearinghouse for regionally significant projects, SCAG reviews the consistency of local plans, projects and programs with regional plans. This activity is based on SCAG's responsibilities as a regional planning organization pursuant to state and federal laws and regulations. Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of regional goals and policies.

We have reviewed the **Avenue Water Treatment Plant/Foster Park Facility Improvements Project**, and have determined that the proposed Project is not regionally significant per SCAG Intergovernmental Review (IGR) Criteria and California Environmental Quality Act (CEQA) Guidelines (Section 15206). Therefore, the proposed Project does not warrant comments at this time. Should there be a change in the scope of the proposed Project, we would appreciate the opportunity to review and comment at that time.

A description of the proposed Project was published in SCAG's **December 1-15, 2003 Intergovernmental Review Clearinghouse Report** for public review and comment.

The project title and SCAG Clearinghouse number should be used in all correspondence with SCAG concerning this Project. Correspondence should be sent to the attention of the Clearinghouse Coordinator. If you have any questions, please contact me at (213) 236-1867. Thank you.

Sincerely,

JEFFREY M. SMITH, AICP
Senior Regional Planner
Intergovernmental Review

RESOURCE MANAGEMENT AGENCY

county of ventura

Planning Division

Christopher Stephens
Director

January 12, 2004

Mr. Paul Calderwood, Sr. Planner
Planning Division
City Hall, Room #117
501 Poli Street
Ventura, CA 93001

Post-it® Fax Note	7671	Date	1/14/04	# of Pages	3
To	John Gray	From	Dennis Mackay		
Co./Dept.		Co.			
Phone #		Phone #	(805) 658-4724		
Fax #	(805) 964-0259	Fax #			

FAX #: (805) 677-3915

Subject: Avenue Water Treatment Plan/Foster Park Facility Improvements Project

Thank you for the opportunity to review and comment on the subject document.
Attached are the comments that we have received resulting from intra-county review of the subject document.

Your proposed responses to these comments should be sent directly to the commentator, with a copy to Carl Morehouse, Ventura County Planning Division, L#1740, 800 S. Victoria Avenue, Ventura, CA 93009.

If you have any questions regarding any of the comments, please contact the appropriate respondent. Overall questions may be directed to Carl Morehouse at (805) 654-2476.

Sincerely,



Christopher Stephens
County Planning Director

G:\WPC\WINWORD\1148-7.03.doc

County RMA Reference Number 03-077

800 South Victoria Avenue, L# 1750, Ventura, CA 93009 (805) 654-2481 Fax (805) 654-2509

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DEC 22 2003



**PUBLIC WORKS AGENCY
TRANSPORTATION DEPARTMENT
Traffic, Advance Planning & Permits Division**

MEMORANDUM

DATE: December 19, 2003

TO: Resource Management Agency, Planning Division
Attention: Carl Morehouse

FROM: Nazir Lalani, Deputy Director *NL*

SUBJECT: Review of Document 03-077
Draft Environmental Impact Report
Avenue Water Treatment Plant (WTP)/ Foster Park Improvement Activities
Lead Agency: City of San Buenaventura

The Transportation Department has completed the review of the Draft Environmental Impact Report for the Avenue WTP/ Foster Park Project. The proposed project would modify and replace the existing water treatment plant to maintain the existing 15 million gallons/day. The project will also retrofit and reconstruct the administrative building and improve Foster Park facilities. The City will need to address the following issues:

1. A section discussing the site specific and/or cumulative traffic impacts of this project should be included in the Environmental Impact Report. 3
2. The project site is in the vicinity of Casitas Vista Road and Santa Ana Road, which was overlaid in August 2002. The project proponent shall repair any damage to Casitas Vista Road and Santa Ana Road due to the traffic generated by this project up to and including providing a new overlay as determined by the Ventura County Transportation Department. 4
3. According to the County policy, trenching shall not be permitted on any street that was rehabilitated within the last 5 years, unless a full width overlay is provided after trenching is completed. 5
4. The project proponent shall mitigate the impact of this project to Highway 33 in the Casitas Springs area. According to adopted County policies, if a project adds one or more AM southbound or PM northbound peak hour traffic (PHT) to SR 33 between the northerly end of the Ojai Freeway and the City of Ojai limits, the project is considered as contributing a significant cumulative impact on SR 33, which would be in violation of the County General Plan and Ojai Area Plan Transportation Policy. 6

All trips generated by this project should be restricted to before 6:30 am, between 9:00 am and 3:30 pm and after 6:30 pm to mitigate the impact on Highway 33.

5. Applicant should be made aware that there are fragile pipelines in the area that could easily be damaged during the construction phases of the project. 7

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

3

Please call me at 654-2080 if you have questions.

c: Ray Gutierrez, Jr.

F:\transport\LanDev\Non_County\03-077-VEN.doc:1a



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE

Southwest Region
501 West Ocean Boulevard, Suite 4200
Long Beach, California 90802- 4213

In response refer to:
151422SWR04PR13818:SCG

MAR 4 2004

Paul Calderwood, Senior Planner
City of San Buenaventura
501 Poli Street, Room 125
Ventura, California 93002

Re: Draft Environmental Impact Report: Avenue Water Treatment Plant/Foster Park
Facility Improvement Project (November 2003)

The National Marine Fisheries Service (NOAA Fisheries) has reviewed the Draft EIR for the proposed modifications to the City's existing water extraction and treatment facilities on the Ventura River near Foster Park, and would like to provide you with the following comments. These comments incorporate by reference the comments we have previously provided the City in a comment letter dated October 7, 2002, on the Notice of Preparation for the Draft EIR. (See attached letter)

As noted in our previous letter, the reach of the Ventura River in which the existing and proposed water extraction facilities are situated is one of the few reaches of the main stem of the Ventura River which sustains a year-round surface flow, extending approximately from the confluence of San Antonio Creek downstream to the estuary at the river's mouth. This surface flow is sustained by a combination of upstream surface flow, springs, and rising groundwater. Consequently, this reach of the Ventura is utilized for steelhead spawning and rearing, as well as migration to and from the ocean. We would also note that NOAA Fisheries recently issued a Biological Opinion for the Robles Diversion Fish Passage Facilities which requires the release of 30 cubic feet per second between storm events from January through May to sustain and restore the steelhead spawning and rearing habitat which exists in the lower Ventura River system, including the project area.

NOAA Fisheries' comment letter on the Notice of Preparation identified five specific potential impacts associated with the proposed project (See letter of October 7, 2003). Of these five, the reduction of surface flows resulting from the operation of the replacement and enlargement of the well field poses the most serious threat to southern California steelhead, which has been listed as a Federally endangered species. Consequently NOAA Fisheries indicated that the EIR should provide a project description which would describe in detail how the new well field would be operated (including the timing and amounts of water extraction) to protect steelhead habitat.



The historic and current operation of the City's Foster Park water extraction facilities has had a noticeable impact on the low flow surface flows within and downstream of the project site, particularly after upstream winter run-off has ceased, and surface flows are sustained by rising groundwater and springs. This diminution of surface flows resulting from water extraction by the Foster Park facilities (during the spring, summer, and fall months) results in reduction of both the quantity and quality of steelhead rearing habitat within the Foster Park/Casitas Springs reach of the Ventura River. The proposed project would increase the number and capacity of the existing wells, and increase the potential water extraction from the Foster Park Facilities from a current peak production of 4,650 gpm, by an additional 4,000 to 6,000 gpm, for a total potential production of 10,500 gpm.

The project description does not identify any specific water extraction regime which would mitigate the impacts of water extraction on the existing steelhead spawning and rearing habitat within this reach of the Ventura River, only a generalized theoretical operational scheme for the water extraction facilities. Further, the proposed hydrologic monitoring scheme does not provide any specific quantitative measures directly related to impacts to steelhead rearing, or triggers for modifying the extraction regime to protect steelhead habitat. The proposed standard for measuring significant impacts under the monitoring scheme ("exceed the historic peak well production rates" which "significantly affect [steelhead] resources") does not provide adequate assurances that the operation of the Foster Park water extraction facilities will be consistent with the requirements of the Endangered Species Act. Finally, the EIR does not address the impacts of the proposed increased water extraction capability of the City's Foster Park facilities on the biological benefits of the water releases which have been established in the Biological Opinion issues by NOAA Fisheries to the U.S. Bureau of Reclamation for the operation of the Robles Diversion Fish Passage Facilities.

To summarize, NOAA Fisheries believes the proposed project has the potential to adversely impact steelhead resources in the Ventura River system by substantially increasing the potential for water extractions from the Ventura River, and that these potential impacts have not been adequately identified or alternatives developed which would mitigate these impacts. NOAA Fisheries appreciates the opportunity to comment on this project, and hopes that these comments (along with our previous comment letter) will be helpful in finalizing the EIR for this project. The primary contacts for this project are Stan Glowacki and Mark Capelli. Please feel free to contact either of them at (562) 980-4061 or (805) 963-6478.

Sincerely,

Rodney R. McInnis

Rodney R. McInnis
Acting Regional Administrator

Cc: Christian Dellith, U.S. Fish and Wildlife Service
David Castanon, U.S. Army Corps of Engineers
David Young, U.S. Bureau of Reclamation
Mary Larson, California Department of Fish and Game
Katie Perry, California Department of Fish and Game



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
Southwest Region
501 West Ocean Boulevard, Suite 4200
Long Beach, California 90802-4213

OCT 7 2002

In response, please refer to:
151422SWR02PR8346:FR

Paul Calderwood, Senior Planner
City of San Buenaventura
501 Poli Street, Room 125
Ventura, California 93002

Re: Foster Park Water Diversion Facilities and Avenue Water Treatment Plant Environmental Impact Report (EIR)

Dear Mr. Calderwood:

The National Marine Fisheries Service (NOAA Fisheries) has received the Notice of Preparation (NOP) of a draft EIR for the proposed modification of existing water diversion and treatment facilities on the Ventura River near Foster Park. NOAA Fisheries offers the City of San Buenaventura the following comments on the scope of issues raised by the project.

Environmental Setting

The proposed project involves water supply facilities at two disjunct sites on the Ventura River in the vicinity of Foster Park and Casitas Springs. The existing water extraction facilities (consisting of a subsurface dam, subsurface collector, surface water intake, and a series of groundwater wells) are located within the active channel of the lower Ventura River as well as within the boundaries of the Ventura County E.P. Foster Memorial Park. The Avenue Water Treatment Plant is situated approximately 1 mile downstream of the water extraction facilities, but within the designated 100-year floodplain of the Ventura River and Cañada Larga Creek.

The reach of the Ventura River in which the existing and proposed water extraction facilities are situated is one of the few reaches in the main stem of the Ventura River which sustains a year-round surface flow, extending approximately from the confluence of San Antonio Creek downstream to the estuary at the river's mouth. Perennial flow below the confluence of San Antonio Creek is sustained by a combination of upstream surface flow, springs, and rising groundwater. As a result, this reach of river provides important seasonal spawning and rearing habitat for steelhead (*Oncorhynchus mykiss*) entering the Ventura River system. Southern California steelhead have been listed as endangered in the Southern California Evolutionarily Significant unit, which includes the Ventura River system.



Project Description

The NOP provides only a cursory description of the proposed project's components. Project components in the vicinity of the Foster Park diversion site are described as a series of new wells and pipelines; several rehabilitated wells; a subsurface collector associated with the subsurface dam; and potential abandonment of unspecified structures in the active Ventura River channel. Similarly, proposed project components at the Avenue Water Treatment Plant are characterized as the construction of a new administration building, the use of membrane filtration and chlorine for primary oxidation and disinfection; the use of chloramines for disinfection of the distribution system; and the implementation of an unspecified water pretreatment technique.

The NOP does not sufficiently describe the project components to assess the full range of issues raised by the proposed project. Most significantly, the project description does not indicate the number or pumping capacities of individual wells, or the diversion capacity of the subsurface collector and the surface diversion. Furthermore, the project description fails to provide an account of how the new facilities will be operated in conjunction with the existing or remaining facilities (e.g., pumping or diversion rates for the individual water extraction components, operation protocols of the various components, etc.). Finally, the project description does not describe the operational timing of the various water wells, surface diversion, and subsurface collector.

Environmental Issues

The proposed project raises a number of environmental issues. The single most significant biological issue is the effects of the water extraction (both surface and subsurface) on the aquatic resources in this reach of the river, including the Federally listed endangered Southern California steelhead. As noted above, the proposed project is situated in a reach of the river which naturally maintains a perennial surface flow. The surface flows are the result of a combination of factors, including flow input from San Antonio Creek, springs, and rising groundwater which is forced to the surface by a shallow geological formation which traverses the river channel in the Foster Park/Casitas Springs area.

Water supply operations at the City's Foster Park facilities can adversely affect aquatic habitats in a number of ways, and the proposed project has the potential to perpetuate and/or exacerbate these impacts. Specific adverse impacts of the water extraction/diversion operations include, but are not necessarily limited to, the following:

1. Disturbing instream habitat through the periodic construction of a pilot channel or berm to direct flows into the existing surface diversion;
2. Impeding the upstream or downstream movement of fish, either by dewatering the channel

below the surface diversion, or creating a physical impediment to fish passage as a result of the construction of a diversion berm;

3. Entraining fish (particularly juvenile fish) into the existing surface diversion, or impinging them against the diversion screen, when the fish screen is not properly installed or maintained;

4. Lowering the surface water level in the river channel, and in some cases de-watering portions of the channel, below the surface diversion;

5. Lowering water level in the river channel, and in some cases completely de-watering the channel, or isolating pools upstream of the surface diversion as a result of the lowering of groundwater levels in the shallow aquifer (which are essential for the maintenance of surface flow and pool depth).

In the past, the City's water extraction operations at Foster Park have resulted in fish stranding as surface water levels or pools are depressed or eliminated during pumping/diversion activities. Reduced surface flows can also result in reduced water quality (e.g., increased water temperatures and/or decreased dissolved oxygen), adversely affecting other aquatic organisms upon which steelhead (particularly rearing young) depend for survival and growth.

The EIR for the proposed project should provide a detailed description of the habitat conditions in the project area over a variety of natural conditions. The project area should encompass the reach of river most directly affected by the construction and operation of the proposed water supply and treatment facilities. The project area should therefore include, at a minimum, the reach of the river extending between Casitas Springs and the Avenue Water Treatment Plant.

The environmental impacts analysis should also provide detailed information on the hydrological and biological effects of the water extraction operations, including analysis of existing and proposed groundwater wells, the subsurface collector, and the surface diversion. Because these effects can vary greatly with the season of the year, the condition of the groundwater basin, and the nature of the water year, this analysis should provide a comparative analysis of all variables and their potential effects on steelhead. This element of the EIR should also be accompanied by a cumulative effects analysis analyzing the cumulative effects resulting from water diversion and extraction activities upstream of the project. These correlative activities may affect the City's proposed project, as well as exacerbate steelhead habitat loss by further reducing the surface flows, groundwater levels, or pool depth within the project area.

Finally, the EIR for the proposed project should provide a substantive alternatives analysis which examines and evaluates alternatives to the proposed project which would avoid the associated impacts noted above, including the impacts arising from water extraction. These alternatives should include alternative facilities design, alternative operational protocols, and alternative sources of water (including water conservation) which would meet project objectives in a manner

which would avoid or reduce project impacts.

In summary, the proposed project raises a number of significant environmental issues, particularly with respect to aquatic habitat and species such as the Federally endangered Southern California steelhead. A thorough EIR which addresses these issues is critical to the local decision making process, and will also be important in addressing Federal regulatory requirements, particularly with respect to endangered species. NOAA Fisheries appreciates having the opportunity to comment on this project in its early phase. The primary contact for this project is Rick Rogers. Please call him at (562) 980-4199 if you have any questions or comments regarding this letter.

Sincerely,

A handwritten signature in dark ink, appearing to read "Rodney R. McInnis". The signature is fluid and cursive, with the first name "Rodney" being the most prominent.

Rodney R. McInnis
Acting Regional Administrator

cc: Christian Dellith, U.S. Fish & Wildlife Service
David Castenon, U.S. Army Corps of Engineers
Katie Perry, California Department of Fish & Game
Mary Larson, California Department of Fish & Game

Rainbow Trout and Steelhead Studies in the Matilija Creek/ Ventura River Basin

Summary of Activities

Christian E. Zimmerman¹ and Reginald R. Reisenbichler

Western Fisheries Research Center
U.S. Geological Survey
6505 NE 65th St.
Seattle, WA 98115

Steelhead and rainbow trout (*Oncorhynchus mykiss*) in the Matilija Creek/Ventura River watershed were examined between June 2000 and February 2002 by researchers from the USGS Western Fisheries Research Center. These studies were intended to examine steelhead populations at the southern extent of their range and provide information to the Matilija Dam Removal planning effort. This report is a summary of activities. A final report is in progress.

Historically, steelhead were thought to exist throughout the Ventura River watershed (including Matilija Creek). The number of steelhead returning to the Ventura River is unknown, although some estimates of run size in the 1930's and 1940's exist. Hubbs (1946) suggested that the Ventura River supported "large and consistent runs" of steelhead. In 1946, California Department of Fish and Game personnel estimated that a minimum of 4000 to 5000 steelhead spawned in the Ventura River system in normal water years (Titus et al. in prep). Currently classified as endangered, steelhead are still observed in the Ventura River (below Robles Diversion Dam) but little is known about their distribution or biology. In this study, we focused on three main objectives: 1) Identification of spawning locations by steelhead and rainbow trout; 2) Describing the distribution and characteristics (including genetic population structure) of rainbow trout throughout Matilija Creek; and 3) Determining the utility of otolith microchemistry for determining the maternal origin and migratory polymorphism in steelhead and rainbow trout throughout the basin. Other objectives that were explored but not implemented will be presented in the pending final report.

¹ Present Address: USGS Alaska Science Center, 1011 E. Tudor Rd., Anchorage, AK 99503
czimmerman@usgs.gov

Spawning Surveys

Between January and June 2001, spawning surveys were conducted throughout the basin. A single steelhead was observed holding in a pool in San Antonio Creek (at Soule Golf Course). Because of private property issues, we were unable to walk San Antonio Creek to locate redds. Rainbow trout were observed spawning in upper Matilija Creek on 29 March 2001. Within the Ventura River, between the Shell Road Bridge and the Robles Diversion Dam, one steelhead redd was encountered on 30 March 2001. The redd was located approximately 100m upstream of the Foster Park Bridge. The redd was 2 m long, in gravel of 25 – 60 mm diameter, and in water of 40 cm depth.

Juvenile Sampling

Rainbow trout sampling was conducted throughout the upper basin by means of electrofishing. The basin was divided into several reaches including:

1. Mainstem Matilija (reservoir to Murietta Canyon)
2. Mainstem Matilija (Murietta Canyon to impassible falls)
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The upper distribution of rainbow trout was encountered above the second falls on the Mainstem Matilija Creek. Scale samples were collected from all fish and age and growth analyses will be reported in the final report.

Otolith Microchemistry

Otolith samples were collected from 6 mortalities collected during the above electrofishing surveys. Otolith microchemistry can be used to describe the chronology of

migration between freshwater and saltwater and identify maternal origin (steelhead or resident rainbow trout). See Zimmerman and Reeves (2000) and Zimmerman and Reeves (2002) for a description of methods. These methods are based on examination of elements (strontium and calcium) in the otolith. Generally, strontium is low in freshwaters and high in the ocean. Analysis is ongoing and will be reported in the final report.

Genetic Population Structure

This work is not yet completed and is being done in collaboration with the Alaska Science Center (Jennifer Nielsen). Using nonlethal, molecular genetics techniques (mtDNA and micro-satellites), samples of fifty fish are being assayed from each of nine potential subpopulations, and compared with baseline data from southern steelhead and from hatchery populations of rainbow trout. We will test the hypothesis that distance upstream from road access and presence of high-gradient reaches downstream (i.e., increased "remoteness" or isolation from stocking locations) are negatively related to genetic contribution from hatchery trout.

During electrofishing surveys (described below) and during downstream migrant trapping (described below), fin clips will be collected from fish for analysis of mtDNA according to the methods of Nielsen et al. (1997). Results will be compared to the distribution of haplotypes in natural and hatchery populations throughout the distribution of steelhead and resident rainbow trout (Nielsen et al. 1994) to determine occurrence of non-native genotypes throughout the basin. Samples will be blocked according to location in basin and the presence of waterfalls.

Previous genetic sampling efforts in the Ventura River system have focused on analysis of haplotypes variation in the mtDNA control-region of juvenile fish from various locations in the basin. Nielsen et al. (1997) examined 32 juvenile fish from Matilija Creek and 3 samples from taxidermy-preserved adult steelhead captured in the Ventura River in the early 1940's. Capelli (1997) reported mtDNA haplotypes of 9 juvenile *O. mykiss* collected downstream of the Robles Diversion Dam. California Department of Fish and Game collected 38 fish from the Upper North Fork Matilija Creek in 1999 (Maurice Cardenas, CDFG, personal communication). Five mtDNA

haplotypes have been identified in these studies. The dominant haplotype (MYS3) is one that is widespread in wild and hatchery populations throughout the California Coast. A haplotype (MYS5) that is more common in southern populations is also present.



ENVIRONMENTAL COALITION

March 22, 2004

Mr. Paul Calderwood, Senior Planner
City of Ventura - Planning Division
501 Poli Street
Ventura, CA 93001

Re: Avenue Water Treatment Plant/Foster Park Facility Improvements Project

Dear Mr. Calderwood:

The Environmental Coalition of Ventura County has read the Draft Environmental Impact Report (DEIR) for the above named project. We have the following comments on the project.

Comprehensive Environmental Review

The proposed project objectives are to 1). Modify the Foster Park facility and the existing Water Treat Plant (WTP) in order to restore the pre-project source water production and treatment capacity of 15 million gallons per day (MGD); and 2). Treat the source water to meet the current and future anticipated requirements of the Safe Drinking Water Act. As noted in the DEIR at page 1-1, there have been two major upgrades to the WTP. Those upgrades occurred in 1950, and 1973. There have also been minor modifications to the WTP to keep in compliance with California Department of Health Services regulations.

The dates mentioned for the major upgrades indicate that the WTP and Foster Park facilities have never been reviewed comprehensively under the California Environmental Quality Act. Now is the time for that comprehensive environmental review.

The document fails to review the complete project. The proposed project represents a 42 % increase over the current extraction of water from the Ventura River. There is also no review of the potential impact from the diversion and subsurface extraction of 15 million gallons per day of source water from the Ventura River. The potential for significant adverse impacts to threatened and endangered species in the "live stretch" of the Ventura River from the removal of 15 MGD, especially during the dry season, is of special concern, particularly given the other measures which have been taken recently, or are planned, to restore and protect steelhead habitat within the Ventura River, including the Foster Park area.

Biological Resources

The document at page 4-30. Sensitive Species, Southern Steelhead Trout, second full paragraph, incorrectly reports that "steelhead could *only* occur in the Ventura River near Foster Park as both transitory adults or smolts in the winter and spring, and as young of the year in the summer." (emphasis added) This is a curious statement since it in fact covers all life stages of steelhead and a complete annual seasonal cycle (winter, spring and summer); in other words the steelhead occupy this reach of the Ventura River on a year-round basis.

Page 2

Environmental Coalition - DEIR comments

Please find attached a USGS Study indicating the existence of steelhead spawning and rearing redds in the exact vicinity of this project.

17

Section 7 Consultation

No reference or discussion is made of the need for Section 7 Consultation with the National Marine Fisheries Service for the potential impact on federally species such as the endangered steelhead trout.

18

Cumulative Impacts

The draft EIR makes no mention of the Robles Diversion Fish Passage Facilities which have recently been approved and are currently under construction. In addition to facilitating the passage of steelhead up and downstream of the Robles Diversion Facilities, this project also modifies the flow release regime to facilitate the passage of steelhead through the lower Ventura River, and improve spawning and rearing conditions in the lower river, including the Foster Park area.

19

The basic operational scheme required by the National Marine Fisheries as part of their Biological Opinion provides that a minimum of 50 cubic foot of second be by-passed when naturally available at the Diversion between the months from January March to facilitate upstream migration of adult steelhead after individual storms. Additionally, the Biological Opinion requires that a minimum of 30 cubic feet per second be by-passed when naturally available at the Diversion between the months of January through June. The purpose of these later flows (30 cfs) is to facilitate out-migration of juvenile steelhead and to restore and protect steelhead spawning and rearing habitat in the lower Ventura River, particularly the Foster Park area.

The Cumulative Impacts section does not assess the potential adverse impacts of the proposed increased pumping capacity of the City's Foster Park Facilities project on these new by-pass schemes which are intended to restore and protect the listed endangered steelhead.

20

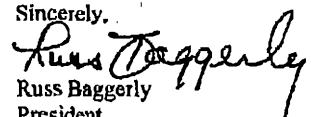
Recommendation

The Environmental Coalition of Ventura requests that the DEIR be revised and re-circulated with a full and complete environmental analysis for this project and all of its phases, including its operational aspects.

21

We appreciate the opportunity to comment on this very important project. Please keep us apprised of its status so that the Environmental Coalition can continue to participate in the environmental review process.

Sincerely,



Russ Baggerly
President
(805) 640-0124

Attachment

cc: Mayor Brian Brennan, City of Ventura
Supervisor Steve Bennett, Ventura County
Christopher Stewart, Dept. of Health Services
National Marine Fisheries Service
U.S. Army Corps of Engineers
U.S. Fish and Wildlife Service
California Department of Fish and Game

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RESPONSES TO COMMENTS

Caltrans, District 7

1. Comment noted. The City will include a notification in the bid documents for the project that the transportation of oversized equipment or materials on State highways such as Highways 33 and 101 must comply with all applicable state laws, and that the Contractor must acquire appropriate permits when necessary. The City will require that the Contractor restrict the delivery of materials and equipment on State highways that require oversized trucks and permits to off-peak commute hours.

Southern California Association of Governments

2. Thank you for the comment. The City agrees that the proposed project is not regionally significant.

Ventura County, Public Works Agency, Transportation Department

3. The impacts of construction related traffic associated with the proposed project is presented in Section 3.3 of the EIR.
4. The City will document the conditions of Casitas Vista Road and Santa Ana Road prior to, and after, any construction work at Foster Park that involves the use of large trucks or construction equipment. This information will be made available to the Ventura County Transportation Department to determine if construction related traffic contributed to any observed damage to the most recent overlay on these roads.
5. Comment noted. The City acknowledges this requirement.
6. The City recognizes the high traffic volume along Highway 33 in the morning peak commute hours (southbound traffic) and in the afternoon peak commute hours (northbound traffic). In addition, the City recognizes the County policies prohibiting the addition of new southbound AM peak hour trips and northbound PM peak hour trips along Highway 33. The proposed project is not anticipated to contribute additional trips that conflict with the County policies. Construction related traffic to and from the WTP and Foster Park sites during the peak commuting hours would be traveling in the opposite direction of the high traffic volume, and as such, would not contribute to the existing congestion. Hence, the City does not believe that traffic mitigation is required. The City will inform the Contractor of the County's policies and request that the Contractor avoid unnecessary construction related traffic during the peak commuting hours along Highway 33.
7. Comment noted. The City will exercise caution when conducting any construction work on or near County roads.
8. Comment noted. No response required.

NOAA Fisheries

9. The Draft EIR indicates that instantaneous pumping rates with the new and modified wells at Foster Park would be increased during certain winters when water availability is higher. As described in the Draft EIR, the new and modified wells would provide operational flexibility for the City to exploit favorable water conditions in the river. However, the average annual water production from Foster Park would not be increased. At this time the City cannot provide a detailed pumping regime until the new wells are installed and their production capabilities are evaluated, and the biological monitoring and adaptive management program (see Mitigation Measure BIO-6) is developed (which will provide restrictions and limitations on pumping to protect aquatic habitat in the river). The description of the pumping regime will include: (1) information on months when the higher pumping rates would be implemented; (2) hydrologic conditions that would trigger higher pumping rates; (3) water supply conditions that would trigger higher pumping rates; (4) information on the duration of higher pumping rates; and (5) information on how the pumping rates in other times of the year would be reduced to offset the seasonally higher rates in order to remain at current annual water production rates. Based on these considerations, a detailed description of a new pumping regime cannot be provided in the EIR at this time.
10. The Draft EIR provides information and an analysis of how pumping from the river alluvium can affect the depth and extent of surface water in the river. The impact assessment in Section 4.3.3.2 clearly indicates that increased peak pumping could adversely affect southern steelhead, and considers this impact potentially significant. NOAA Fisheries' comments are consistent with the analyses and conclusions in the Draft EIR. Please note that the analyses provided in the EIR includes hydrologic simulation modeling of the interaction between pumping and alluvial groundwater drawdown, and direct observations of impacts on surface water during field pump tests.
11. Please see response to comment 9.
12. Mitigation Measure BIO-6 has been modified as follows: (1) criteria and thresholds to identify impacts to steelhead habitat would be developed with NOAA Fisheries; (2) actions to reduce or avoid adverse impacts due to peak well production are explicitly stated in the measure; (3) the biological monitoring and adaptive management actions must be consistent with NOAA's Biological Opinion for the new and modified wells, pursuant to a Section 7 consultation on the project with the federal funding agency (i.e., EPA); and production from new and modified wells would not proceed until NOAA Fisheries as approved, or concurred with, the biological monitoring and adaptive management program. These modifications will ensure that the NOAA Fisheries' concerns would be addressed, that the operation of the wells will be consistent with the Endangered Species Act, and that a significant impact to steelhead would be avoided as concluded in the EIR. The modified Mitigation Measure BIO-6 reads as follows:

BIO-6. The proposed River Monitoring Program shall incorporate biological habitat monitoring to detect and evaluate potential adverse effects on aquatic habitat and riparian vegetation in the river due to reduced alluvial groundwater levels at, upstream, and downstream of Foster Park. The monitoring shall be designed to detect changes in sizes and depths of pools and live streams, water temperatures, and riparian plant conditions,

and to determine if such changes are due to peak production from the City's proposed new and modified wells at and near Foster Park. The City shall collect and review the biological data at sufficient frequency to provide a reliable factual basis to determine if there is a measurable effect on aquatic habitats and riparian vegetation that is attributable to a change in groundwater level due to peak well production. If such an effect is detected, the City shall evaluate whether the changes are sufficient to affect the condition of fish (including the southern steelhead) and riparian vegetation. If there is a potential to significantly affect these resources due to peak well production rates from the new and modified wells, the City shall modify pumping to reduce or eliminate the impact. The program shall include the groundwater monitoring criteria from Mitigation Measure W-5. The biological monitoring program shall include measurable criteria and thresholds developed with US Fish and Wildlife Service and NOAA Fisheries, and specific adaptive management actions to be implemented when adverse impacts are detected. Such actions may include reducing peak pumping for a specified duration, modifying the time of day for certain pumping rates, modifying the number and locations of wells pumping at a certain rate, and other modifications of the pumping regime that would reduce impacts. The biological monitoring program and adaptive management actions shall be consistent with the results of the Section 7 endangered species consultation for this project between the Environmental Protection Agency (the funding source) and US Fish and Wildlife Service and NOAA Fisheries. The increased peak pumping regime using the new and modified wells shall not commence until this consultation process has been completed, and US Fish and Wildlife Service and NOAA Fisheries have approved, or concurred with, the biological monitoring and adaptive management program developed pursuant to this mitigation measure.

13. Development of the monitoring criteria and thresholds in the biological monitoring and adaptive management program for the new and modified wells would, by necessity, include a consideration of the flow by-pass requirements at the upstream Robles Diversion because these increased flows will represent the new environmental baseline conditions in the river.
14. The Draft EIR presents the same conclusion in the comment – the proposed increase in peak pumping could result in significant impacts to the southern steelhead. The impacts of potentially reducing surface flows and pools in the reach upstream, at, and downstream of Foster Park are identified in the Draft EIR. A feasible mitigation measure (BIO-6) has been identified that would avoid this significant impact in accordance with the requirements of NOAA Fisheries.

Environmental Coalition

15. The comment states that the proposed project would increase current water extractions from the Ventura River by 42 percent. This is not accurate. The Draft EIR states on page 2-16 that *"The long-term average annual production from the Foster Park facilities would remain the same under the proposed Project – that is, about 6,700 acre-feet per year."* The comment states that there is no review of the potential impacts of the extraction of 15 MGD from the Ventura River. Sections 4.2 and 4.3 of the Draft EIR present assessments of the impacts of higher peak well production on hydrologic conditions, water quality, riparian and wetland habitat, and the endangered southern steelhead. Potentially significant impacts to aquatic and riparian habitats and the

steelhead due to higher peak production rates are evaluated in the Draft EIR and mitigation measures to avoid these impacts are identified.

16. Page 4-30 of the Draft EIR has been revised in response to the comment by removing the word "only" from the sentence. This modification to improve the grammar and clarity of the sentence has no effect on the impact conclusions in the Draft EIR.
17. Thank you for sharing the USGS report and the documented evidence of steelhead spawning along the Ventura River at Foster Park. The USGS report was not issued to the general public and as such, was not known to the City of Ventura when preparing the Draft EIR.
18. Mitigation Measure BIO-6 has been revised to indicate that a Section 7 endangered species consultation with NOAA Fisheries is required by the Department of Health Services, and that the City's biological monitoring required under this measure must be consistent with the outcome of the consultation.
19. Thank you for the information concerning the Robles Diversion Dam Fish Passage Facility, and the requirement for by-pass flows during the winter. These flows will be considered during the development of the biological monitoring program under Mitigation Measure BIO-6, to be prepared in consultation with NOAA Fisheries.
20. Section 6.0 of the Draft EIR has been revised to address potential cumulative impacts of the Robles Diversion Fish Passage Facility. No significant cumulative impact is anticipated.
21. The City does not believe that recirculation of the Draft EIR is required as the document evaluates all potentially significant impacts, identifies all feasible mitigation measures, and compares alternatives. No new significant impacts, mitigation measures, or other key information were identified during the public comment period that would modify the Draft EIR results and require a new public review.

Final Environmental Impact Report
Avenue Water Treatment Plant/
Foster Park Facility Improvements Project

SECTION 4

ERRATA AND MINOR CORRECTIONS TO THE DRAFT EIR

Changes in the text are indicated by ~~strikeout~~ or ~~deleted words~~ and underline for new words

concepts that will increase public awareness of the water production and treatment process at the facility, and stimulate interest in this facility which is located on the periphery of the Westside community.

One preliminary concept is to create a new gate to the facility which would suggest, through artistic treatments of a metal gate, the technology and hardware used in the water treatment process. Another possible concept is to enhance the sedimentation and flocculation basins on the east side of the existing Administration Building. These concrete basins will be de-commissioned under Phase I of the proposed Project. However, they will be retained due to their importance in the historic context of the building. The artist has suggested making the basins open for people to walk through and to view three-dimensional hangings and pictographs that portray the water treatment process. Other concepts are also being developed. Any proposed public art for the facility would be presented to the Public Art Commission at public meetings to review and approve the preliminary and final designs.

Project Phasing

The following improvements at the WTP would occur under Phase 1 of the proposed Project:

- Kingston Reservoir modifications
- New wastewater recovery basins
- New sludge drying beds
- Electrical and control systems
- Return water pre-treatment system
- Membrane feed pumps
- Automatic feed strainers
- Settled water pipeline and coagulant addition system
- Chemical systems and building
- Membrane units and building
- Public art

The following existing facilities will be demolished as part of the proposed Project to make room for the new facilities (see Figure 9): sludge beds, pump control building, wash water return basins, covered parking area, and the chlorine storage area behind the Administration building.

Pending funding amounts, the sedimentation and flocculation basins on the west side of the Administration Building will be removed under Phase I. If not, the basins will be removed under Phase II in order to provide space for the new administration building (Figure 8b). During the interim period, they will be decommissioned and maintained only to ensure employee safety. Similarly, the ramp on the north side of the Administration Building will be removed under Phase II if there are sufficient funds.

2.2 FOSTER PARK FACILITY IMPROVEMENTS

2.2.1 Existing Facilities

The Ventura River supplies about one-third of the City's 21,000 acre-foot annual water supply through its Foster Park facilities. Foster Park is a County park with day use and camping areas located along the Ventura River about six miles from the ocean (Figures 1 and 10). The City's Foster Park facilities include a surface water diversion, an underground dam, two subsurface intake pipes, and four shallow wells (Nye Wells) within the Ventura River alluvium. Water produced at the facilities is conveyed by gravity and pumping to the Kingston Reservoir at the WTP.

The surface and subsurface diversion facilities in Foster Park are located on land owned by Ventura County. The City of Ventura acquired surface water diversion facilities from the Southern California Edison Company in 1923. The City retains a permanent right to operate, maintain and develop water-related facilities in the 189-acre park.

The City's wells are located on a 140-acre parcel owned by the City, located north of Foster Park (Figures 10 and 11) ~~where public access is prohibited~~. The City's groundwater wells are over 60 years old.

The surface diversion is a simple weir structure located adjacent to the submerged dam, and approximately 300 feet west of the eastern edge of the submerged dam (Figure 11). The surface diversion delivers water to a receiving chamber that discharges to a 36-inch diameter concrete pipe that has been slip-lined with a 29-inch diameter pipe (Figure 12). The surface water diversion can deliver up to 4,873 gpm (10.83 cfs) which would provide 7,841 acre-feet per year if surface diversions occurred year-round. Operation of the surface diversion requires the annual re-construction and periodic maintenance of diversion dikes, comprised of riverbed materials, to direct the surface water to the diversion structure. Operation of the diversion has been intermittent due to maintenance requirements. Diversions ended in 2001 when storm flows moved the river channel away from the diversion structure.

The average annual production from the surface diversion from 1977 to 2000 was 1,750 acre-feet per year (equivalent to 1.56 MGD or 1,085 gpm), with a monthly average that ranged from 79 acre-feet to 236 acre-feet.

Groundwater flow through the alluvial aquifer in the Foster Park area is impeded by a submerged dam located approximately one-quarter mile north of the Casitas Vista Road bridge (Figure 11). The submerged dam extends from the confluence with Coyote Creek partially eastward across the river approximately 973 feet. The dam was constructed to bedrock and is about 5 feet deep at the west end, and gradually increases to a maximum depth of 40 feet at its eastern end. The dam does not extend completely across the alluvial basin. A gap of approximately 300 feet exists between the eastern edge of the dam and the bedrock bounding the east side of the basin. The gap exists reportedly due to construction constraints related to excessive depths and the dewatering limitations. The submerged dam obstructs groundwater flow, increases the saturated thickness of the alluvium,

subsurface conditions at each location. A permanent, 22-inch-diameter, mild steel conductor casing, with a 1/2-inch wall thickness will be installed approximately 25 feet from ground surface. The conductor casing would provide added stabilization and protection for the well in the event of future channel widening during flood conditions.

Static water level variations and the anticipated well specific capacities have been considered to establish the depth to the top of the well screen and the seal depth. Assuming an average specific capacity of 200 gpm/ft and an average static water level of 19 feet, drawdown at a rate of 2,000 gpm would be approximately 10 feet. Drawdown under these conditions for a well pumping at 3,000 gpm would be 15 feet. Based on these estimates, the top of the screen should be placed at a depth of approximately 30 feet for average hydrogeologic conditions.

The anticipated yield of the new wells is in the range of 1,000 to 3,000 gpm each. To accommodate this pumping rate, the 20-inch diameter casing will be used to house a pump capable of production of this magnitude. The annular seal for the well will consist of several feet of bentonite clay placed directly on top of the gravel pack, and a cement grout placed in the annulus above the bentonite seal to the ground surface.

The well head mechanical equipment would include a variable speed drive and motor, a water-lubricated vertical turbine pump, a flexible connection, a check valve, an air release valve, a magnetic flow meter, and a well isolation valve. ~~and a valve to permit sending well water to waste.~~ This equipment is shown for proposed Well Nos. 10, 11, and 12 on Figures 17a-c.

Well Pads and Access Roads (Phases I and II)

After drilling the new wells, pads will be constructed around the well head to provide a surface for the aboveground equipment. The well pad design will be the same for all wells, and is shown on Figures 17a-c. A 24-foot long and 7-foot wide concrete pad will be constructed to support the equipment. The well pad will be placed at an elevation that is one foot above the 100-year flood level. A 7-foot diameter concrete casing will be installed around the top of the well, extending to a depth of 20 feet to provide protection from any severe flooding that cause significant erosion.

Construction of the concrete casing will require excavation of a pit about 70 by 70 feet at each well pad. The pit will be backfilled and compacted, then the concrete pad will be constructed on the top of the fill. This process will involve the temporary excavation of about 2,000 cubic yards of soils at each well. This material will be temporarily stockpiled near the well pad under construction.

An earthen well pad will be constructed for each well using onsite materials derived from drilling and construction of the casing for the well. The height and footprint of the pad will vary for each well, as shown on Figures 17a-c. The maximum height of the pad would be 2 feet above existing grade. The footprints of the pads at proposed wells are summarized below:

	General Dimensions	Approximate Area
Well No. 10	60 x 35 feet	2,100 square feet
Well No. 11	40 x 20 feet	800 square feet
Well No. 12	40 x 20 feet	800 square feet

An 8-foot high chain link fence with a 3-strand barbed wire extension will be placed around each well pad.

10-foot wide dirt roads will be constructed to provide access to the well pads from the existing dirt road in their vicinity (Figures 17a-c). The road spurs would be 10 to 20 feet long at each well pad.

A rock gabion wall will be installed at the base of the well pad slope on the north side of the pad at Well No. 10 to provide protection from scouring in the event of a severe flood. The 3-foot wide and 4-foot high rock wall would be buried to a depth of 3 feet (Figure 17a)

Well pads have not been designed for proposed well Nos. 9 (on the west side of the river) and No. 13 (on the east side of the river), to be constructed under Phase II, if needed (Figure 13). However, the same type of design used for the above wells would be used, modified to address site specific conditions at these two well locations.

Standby Power (Phase I)

Provisions to supply emergency power to the supply wells will be made based upon the use of a portable engine generator. A plug-in generator connection will be provided at the motor control center at each new well. The portable generator required would need to provide power for 40 HP well pumps.

New Water Pipes (Phase I)

The new wells on the east side of the river (Wells No. 10, 11, 12 under Phase I and No. 13 under Phase II) would be connected to a new 24-inch pipeline that would traverse the center of Foster Park and connect to the existing 24-inch transmission pipeline (Figures 13, 14 and 15a,b). A new 24-inch inter-tie between the existing 24-inch and 36-inch pipelines would be provided near the new subsurface collector caisson (Figure 15a).

Well Pad Protection at Well No. 7 (Phase II)

A rock groin will be installed upstream of Well No. 7 to increase the level of protection from flooding (Figure 18). The rock groin would be about 60 feet long. It would be keyed into the existing bank for a distance of 25 feet, and extend about 35 feet into the river. The top and bottom widths of the groin would be 3 and 25 feet wide, respectively. The groin would be constructed of ½ to 1 ton angular ungrouted rip-rap rock, requiring about 500 cubic yards of stone. It would be keyed into the river bed at its terminus to a depth of about 3 to 5 feet below ground surface. The existing boulders surrounding Well Nos. 7 and 8 would remain.

New Water Pipes (Phase II)

Under Phase II, an additional 36-inch inter-tie connection would be installed as shown on Figure 15a to provide more efficient and flexible transmission of water from the Foster Park facilities to the WTP.

Under Phase II, the City may install Well No. 9 on the west side of the river (Figure 14). The additional well, combined with improved production from existing Nye Well Nos. 7 and 8 from Phase I improvements, will require a larger pipe to convey water across the river. The proposed new water pipe will connect to the existing transmission piping (24-inch) on the east side of the river that was installed under Phase I (Figure 14).

An existing ~~15-inch~~ 16-inch reinforced concrete pipeline currently serves Well Nos. 7 and 8 on the west side of the river, crossing under the Ventura River at a depth of approximately 10 feet below the river bed (Figure 14). This pipe will remain in place and continue to serve these wells after their improvements (e.g., new pumps) under Phase I. However, if and when Well No. 9 is installed under Phase II, a new 18-inch pipe crossing of the river would become necessary to carry flows up to 4,500 gpm. The City is considering several options, as described below.

Under the first approach, the new 18-inch pipe would be installed under the river from the location of the new Well No. 9 and running east across the river (Figure 14). The City investigated four construction methods: pipe bursting the existing ~~15-inch~~ 16-inch diameter pipeline crossing and using that alignment; direct pipe jacking across the river; micro-tunneling across the river; and horizontal directional drilling (HDD). The other approach would be to go south several thousand feet with a buried 18-inch pipeline to the Casitas Vista Road bridge and attaching the pipeline to the bridge to cross the river. These options were compared in the Preliminary Design Report (Kennedy Jenks, 2002) and the findings are summarized below.

The City determined that the pipe bursting option was not practical because of bends in the existing pipe. Direct pipe jacking option was also determined to be infeasible because it would be difficult to jack through large boulders, and this option would not allow for placement of the pipe below the scouring depth.

Micro-tunneling was determined to be a potentially viable option since micro-tunneling is feasible in boulder-filled alluvium. However, it would be a more costly option due to the deep shafts that would be required to facilitate the tunnel at a depth that protects the pipeline from scour during flooding (about 40 feet deep). Micro-tunneling would entail providing a 10-foot diameter, 40-foot deep jacking shaft and an 8-foot diameter, 40-foot deep receiving shaft at the ends of the approximately 450-foot long tunnel. A 36-inch casing would be installed, followed by the 18-inch pipeline. Extensive dewatering associated with the shafts would most likely be required during construction.

HDD consists of pulling the pipeline (usually high density polyethylene pipe (HDPE), because of its flexibility) from one point to another underground on a large radius using a series of drilling heads, each one successively larger than the next until an annular space is provided which is large enough to

will be discharged to the Ventura River in accordance with a Waste Discharge Requirement issued by the Regional Water Quality Control Board. This permit requires that the discharged water be dissipated to prevent channel erosion, and that the discharge water does not contain any pollutants that would exceed standards in the General NPDES Permit CAG994001, which authorizes groundwater discharges for well testing and construction. The permit also requires monitoring of the discharged water and sampling to detect any pollutants. It is estimated that well testing will occur for 2 to 3 days for each well, and involve up to 3,000 gpm and about 750,000 gallons per day.

Drilling operations will require a work area of about 50 by 100 feet, where the drilling rig, drilling fluid pump and separator system, and work trucks will be located. Drilling will occur prior to the construction of the well pad.

New Water Lines in Foster Park and Adjacent City Property

The three new wells on the east side of the river (Wells No. 10, 11, and 12) will be connected to a new 24-inch pipeline that will traverse the center of Foster Park and connect to the existing 24-inch transmission pipeline (Figures 14 and 15a). The pipe will be installed using a backhoe. A 5- to 8-foot deep and 4-foot wide trench will be temporarily excavated for a distance of about 1,700 feet (extending from the inter-tie to new Well No. 10 (Figure 14)). About 900 feet of this pipe will occur in Foster Park; the remainder will occur on City property north of Foster Park. The pipe will be installed in the trench, which will then be backfilled and restored to pre-construction grade and condition. In Foster Park, the post-construction restoration will include restoring turf, portions of a playing field, a picnic area, and a parking lot. The pipe alignment on City property north of Foster Park is located in or adjacent to the existing dirt road. The road bed will be restored after construction; other areas will be restored to pre-construction grade and seeded with native plants.

Pipeline installation will require about 25 days. All work would occur during the day. About 900 cubic yards of excess earth will be removed off site. Portions of the park will need to be temporarily closed during construction. However, most of the park will be fully accessible during construction.

Well Destruction – Nye Well No. 1A

This interim well will be destroyed once a replacement well (either Nos. 10, 11, or 12) has been installed and is performing as expected. The well will be destroyed per County standards. The aboveground piping and equipment will be removed, and the well pad restored to grassland/scrub conditions to match surrounding vegetation.

Well Pad Protection – Nye Well No. 7 [Moved to page 2-28]

~~Construction of the rock groin at Well No. 7 will require the use of an excavator operating from the floodplain adjacent to the well pad. The excavator will access the floodplain by driving down the well pad slope. A 25-foot wide temporary construction zone will be established on each side of the rock groin that will extend about 30 feet into the floodplain. A 3 to 5 foot deep trench will be excavated for the toe of the groin, which will be about 10 to 15 feet high.~~

Construction Schedule, Access, and Staging

The Phase I improvements will be completed during an approximately five-month period during the period September 2004 through September 2006. The work at and near Foster Park will proceed independent of construction at the Avenue WTP, and may be conducted by a different contractor. ~~The only work that would occur in the river channel under Phase I would be the installation of the rock groin at Well No. 7. This work would be restricted to the period July through October to avoid conflicts with aquatic resources in the river.~~

Construction activities will be restricted to weekdays, and occur from 7 AM to 5 PM (in some instances, until 7 PM) except for well testing which will occur for 2-3 days for 12-hours per day. Three wells will require testing. Construction vehicles will access the site from Highway 33 and Casitas Vista Road. A construction staging area will be established on the vacant land immediately north of Foster Park restrooms and adjacent to the caretaker's trailer, with permission from Ventura County. The staging area will have a temporary chain link fence. All construction worker parking will be restricted to this area. Work areas in the park will be demarcated with temporary orange plastic fencing, or in some instances, with temporary chain link fencing. The work in the Park or on City property north of the park will not affect use of the Ventura River Trail.

2.2.6 Construction Activities – Phase II

The following description of construction activities for Phase II facilities represents the most likely scenario. The proposed construction methods will be determined after the design for these facilities are completed, and presented in a supplemental environmental review document for Phase II improvements. Phase II improvements will likely occur as several separate projects that will occur at different times.

Production Wells

It is anticipated that the additional new production wells (Nos. 9 and 13) will be installed, tested, and brought on line in the same manner as the Phase I new wells (Figures 13 and 14). Installation of Nye Well No. 13 will be readily accomplished because it is located in an open, flat area of Foster Park. Installation of this well will require removal of a clump of four large palm trees located between the park road and the river bank. Alternative locations for well would remove large native sycamore trees.

The construction requirements for Nye Well No. 9 are undetermined at this time. The well will be located on the west bank of the Ventura River, within 10 or 15 feet of the top of bank (Figures 13 and 14). The proposed well location is covered with dense giant reed plants, and as such, cannot be viewed. The need to grade and possibly elevate a well pad at this location will be determined during the design for this well. In addition, the need and type of bank protection, if any, will also be determined.

Well Pad Protection – Nye Well No. 7

Construction of the rock groin at Well No. 7 will require the use of an excavator operating from the floodplain adjacent to the well pad. The excavator will access the floodplain by driving down the well pad slope. A 25-foot wide temporary construction zone will be established on each side of the rock groin that will extend about 30 feet into the floodplain. A 3 to 5 foot deep trench will be excavated for the toe of the groin, which will be about 10 to 15 feet high.

New Pipe Crossing

As described above, the City has not selected a method to install the new 18-inch pipe to serve new Nye Well No. 9, as well as Nye Well Nos. 7 and 8. The City has determined that there are only three feasible options: (1) micro-tunneling; (2) horizontal directional drilling; and (3) trenching along a route outside of the river (i.e., along Casitas Vista Road). All three methods will avoid work in the river channel. The first two methods will require 1-2 acre work areas on each side of the river to excavate shafts and ramps for the drilling work. Depending upon the precise boundaries of these work areas, they could require temporary grading and removal of mature oak or willow trees. The pipe along Casitas Vista Road would be placed in a trench that is located in dirt roads, road shoulders, and paved road beds.

Well Pump Modifications – Nye Well Nos. 7 and 8

The existing pumps on Nye Well Nos. 7 and 8 will be removed using manual labor and a truck with a small crane. New pumps will be installed. This work will only involve mechanical activities, painting, and welding. The earthen well pad will remain intact. An 8-foot high vinyl coated chain link fence with a barbed wire extension will be placed around wells for security. The fence will be installed with manual labor. Construction vehicles can access both well pads from existing 10 to 12-foot wide dirt roads.

Destruction of Nye Well No. 2 and Abandonment of Existing Pipe

Nye Well No. 2, located in the center of the river channel, will be destroyed in accordance with County requirements. All aboveground structures will be demolished and disposed off site. Construction equipment will access the well using the current overland route in the river channel established by the City to maintain the well. Construction equipment will include loaders, backhoe, a small truck-mounted crane, worker vehicles, and 5-ton haul trucks. The existing 8-inch pipe serving the well will be abandoned in place. The PVC portions of the pipe will be removed, while the concrete portions will remain under the river bed.

Removal of Surface Diversion and Relocation of Subsurface Collector

A description of the possible construction activities to relocate the subsurface collector and associated piping is provided above. This work would require trenching 300 feet of 24-inch pipe (mostly in the river channel) to remove it; trenching 300 feet of river channel to remove a 36-inch pipe; trenching 550 feet (in the park) to install a new 36-inch pipe; and trenching 350 feet to install

3.0 OVERVIEW OF THE ENVIRONMENTAL ANALYSIS

3.1 LEVEL OF ANALYSIS IN THE EIR/EIS

As described in Section 2, the proposed Project includes two phases. The facility improvements under Phase I are fully funded and will be implemented immediately upon project approval and receipt of permits from other agencies. Phase II involves actions that may or may not occur in the future, depending upon available funding and the performance of the new wells at Foster Park. A summary of the two phases is presented below in Table 3-1:

TABLE 3-1
SUMMARY OF PROJECT PHASES

Project Element	Phase I	Phase II or Later
WTP improvements: Kingston Reservoir modifications; new washwater recovery basins; new sludge drying beds; new electrical system; return water pre-treatment system; source water pumps and automatic feed strainers; settled water pipeline and coagulant addition system; new chemical system and building; and membrane units and building; remove sedimentation/flocculation basins; remove ramp; implement public art project	X	
Install new Nye Well Nos. 10, 11, and 12 and associated piping	X	
Destroy interim Nye Well 1A	X	
Construct rock groin at Nye Well No. 7	X	X
Install emergency power connections at Foster Park facilities	X	
Increase pumping when water is available to provide peak production rate of 8,500 to 10,500 gpm	X	
Implement a river monitoring program to ensure increased peak production does not impact aquatic habitat in the river	X	
Construct new Administrative Building and change in use for existing administrative building (e.g., storage, limited visitor use)		X
Install new pumps on existing Nye Well Nos. 7 and 8; install fence enclosures around both wells		X
Install new Nye Well Nos. 9 and 13 (if necessary) and associated piping, including new pipe across the river; abandon existing pipe across the river		X
Remove Nye Well No. 2 from the river [only if replacement well is installed and target production rates are achieved]		X
Remove surface diversion and subsurface collector facility; relocate subsurface collector and piping to park; notch the dam for fish passage [only if target production rates are achieved with new wells, and funding is available]		X

b) Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?

c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

e) Result in inadequate emergency access?

f) Result in inadequate parking capacity?

g) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?

The proposed facility improvements at the WTP and Foster Park will not result in additional maintenance and operation staff. Hence, there will be no increase in long-term employee vehicular trips to and from the project sites.

Construction activities at both sites will involve additional traffic on local roadways due to construction worker vehicles and trucks. The latter will include the delivery of construction materials and hauling of debris from the project sites.

The primary access route to and from the WTP for construction related traffic would be from Highway 33 to Canada Larga (via exit and entrance ramps), then along a short reach of North Ventura Avenue to the plant site. In some instances, construction traffic may access the WTP site from Ventura Avenue, traveling north from Ventura.

The current annual daily traffic volume (ADT) on Highway 33 near Canada Larga Road is over 27,000 vehicles per day. The estimated ADT along Ventura Avenue north and south of Canada Larga Road is 1,000 and 3,000 vehicles per day with a Level of Service (LOS) A. The following intersections are currently operating at LOS B during peak AM and PM hours: Canada Larga Road and Ventura Avenue, Canada Larga Road and Highway 33 southbound ramps, and Canada Larga Road and Highway 33 northbound ramps.

The average daily traffic associated with construction activity at the WTP site is estimated to be 18 vehicles per day. The peak hour AM traffic is expected to be about 35 vehicles, and would only occur on an intermittent basis during the 20-month construction schedule. These traffic volumes are very low relative to the existing traffic volumes, and would be traveling in the opposite direction of the prevailing traffic on Highway 33. In addition, there is substantial unused capacity at the affected roads and intersections. Hence, construction related traffic at the WTP site is not expected to adversely affect the operation of the nearby intersections.

The primary access route to Foster Park for construction vehicles would be Highway 33 to the Casitas Vista Road exit, then to the Park entrance. The construction related traffic at Foster Park will

adverse geologic conditions or seismic events. Based on this consideration, no significant impact is anticipated due to geologic hazards or constraints at the WTP site under Phases I or II.

Construction of the WTP improvements under Phase I will require extensive grading and the exposure of topsoil. No loss of topsoil is anticipated because the site is relatively flat and not prone to water-borne erosion, and all undeveloped areas at the WTP site will be stabilized after construction with landscaping and/or pavement. Construction of the new administration building and other minor facilities under Phase II would involve substantially less ground disturbance, and as such, would have less impact on top soils.

4.1.2.3 Mitigation Measures

The proposed WTP improvements under Phases I and II would not cause, nor be affected by, geological hazards. Hence, no significant geologic impact is anticipated and no mitigation measures are required.

4.1.3 Foster Park

4.1.3.1 Existing Conditions

Most of the proposed new wells and pipes will be located on the alluvial terraces along the Ventura River in and near Foster Park. The terrain in the proposed facility locations is relatively flat, consisting of an active floodplain. Soils at the on the terraces are considered riverwash material, consisting of highly stratified water-deposited layers of stony and gravelly sand with small amounts of clay and silt. Drainage is excessive, permeability is high, and runoff is rapid.

The adjacent river channel consists of a mixture of cobbles, gravels, and sands that are continually disturbed by annual winter flows. The project facilities that are located in the river channel include: the rock groin at existing Nye Well No. 7 under Phase II, the proposed pipe across the river to serve Well No. 9 under Phase II, and the destruction of existing Nye Well No. 2, also under Phase II.

4.1.3.2 Potential Impacts

Phase I Facilities

Under Phase I, the City will install up to three new wells and associated piping in Foster Park and the City property north of the park, destroy Nye Well No. 1A, ~~install a rock groin at Nye Well No. 7,~~ increase peak water production (when needed and water is available), and establish a river monitoring program.

The proposed new wells and pipes would not be installed on steep slopes or in areas with known geologic hazards (i.e., landslides, steep erosion-prone terrain, or in areas of expansive or liquefiable soils). The facilities would be designed to withstand ground movement that is typical of seismically active areas, as well as due to normal settlement. Hence, the facilities are not expected to be adversely affected by geologic hazards at the site or in the region.

Well drilling would only involve minor alterations of the topography as a drill hole is created and then backfilled with conductors and casings. Hence, no unstable slopes or geologic hazards would be created.

Construction of the well pads will require substantial temporary excavation to construct the 7-foot diameter concrete casing to protect the upper well from severe flood erosion. Construction of the concrete casing would require excavation of a pit about 70 by 70 feet at each well pad. The pit would be backfilled and compacted, and then the concrete pad would be constructed on the top of the pad. This process would involve the temporary excavation of about 2,000 cubic yards of soils at each well. This material would be temporarily stockpiled near the well pad under construction. An earthen well pad would be constructed for each well using onsite materials derived from drilling and construction of the casing for the well. The maximum height of the pad would be 2 feet above existing grade. The footprints of the pads at proposed wells would range from 800 to 2,100 square feet. Areas surrounding the well pad disturbed by stockpiling and equipment activities would be restored to pre-construction grade and seeded. Well pad slopes would be compacted and seeded to prevent erosion. Based on this information, construction of the well pads is not expected to cause any adverse geologic impact, such as creation of unstable slopes.

The installation of pipes in and near Foster Park would require excavation of a small trench; however, the trench would be backfilled and returned to pre-construction grade. Disturbed areas would be seeded or landscaped, as necessary, to match pre-construction conditions.

Construction of the well pads and installation of the pipes would require highly localized grading and the exposure of topsoil. However, no loss of topsoil is anticipated because the work sites are relatively flat and not prone to water-borne erosion, and all disturbed areas will be stabilized after construction with seeding or landscaping.

~~Construction of the rock groin at Well No 7 on the west bank of the Ventura River would require excavation of the river bed adjacent to the bank to place rock below the channel invert. This excavation would not adversely affect the well pad slope because it would occur outside the well pad slope, and because the rock groin would indirectly strengthen the adjacent well pad slope. [moved to page 4-6]~~

Based on the above information, the construction of the Phase I facilities at and near Foster Park would not would not cause or exacerbate any geologic hazards.

Phase II Facilities

Under Phase II, the City would install up to two new wells (including one on the west side of the river) and associated piping (which would include a pipe across the Ventura River), destroy Nye Well No. 2 in the river channel and abandon the associated piping, relocate the subsurface collector in the river channel to Foster Park, remove the surface water diversion facility, notch the top of the exposed subsurface dam, and install another new raw water pipe in Foster Park, increase peak water production (when needed and water is available), and continue the river monitoring program.

logistic difficulties crossing private properties. Based on these analyses, it is assumed that micro-tunneling or HDD would be the most likely method to install the new pipe across the Ventura River. Both options would require excavation of large trenches or pits at each end of the pipe. This excavation would be temporary, and the pits would be backfilled and returned to pre-construction grade. The pits would be located in flat areas above the banks of the Ventura River. Hence, the river banks would not be disturbed or destabilized. Based on this information, the installation of a pipe under the river using micro-tunneling or HDD would not cause or exacerbate any geologic hazard such as landslides, unstable slopes or river banks, or areas of expansive or liquefiable soils.

Construction of the rock groin at Well No. 7 on the west bank of the Ventura River would require excavation of the river bed adjacent to the bank to place rock below the channel invert. This excavation would not adversely affect the well pad slope because it would occur outside the well pad slope, and because the rock groin would indirectly strengthen the adjacent well pad slope.

In summary, the construction of the Phase II facilities at and near Foster Park would not cause or exacerbate any geologic hazards.

4.1.3.3 Mitigation Measures

The proposed Foster Park improvements under Phases I and II would not cause, nor be significantly affected by, geological hazards. Hence, no significant geologic impact is anticipated and no mitigation measures are required.

containers, with secondary containment and spill contingency devices and procedures to prevent accidental releases to the environment.

Chemical	Current Storage	Future Storage
Alum	8,000 gals	8,000 gals
Coagulant polymer	500 gals	0
Polyorthophosphate	6,000 gals	1,500 gals
Chlorine	10 one-ton containers	14 one-ton containers
Aqueous ammonia	3,400 gals	3,400 gals
Caustic	0	6,000 gals
Citric acid	0	500 gals
Hypochlorite	0	500 gals
Sodium bisulfite	0	500 gals
Fluoride (Phase II)	0	1,250 gals

The proposed Project would not cause an increase in the number of employee vehicles and trucks at the project site, which could discharge oil and gas to paved areas where it could be transported off site by stormwater. Hence, the proposed Project is not expected to adversely affect the quality of stormwater discharged from the site.

4.2.2.3 Potential Impacts – WTP Phase II

Under Phase II, the City would construct a new Administrative Building and associated parking at the WTP site (Figure 8b). The installation of this building would not substantially alter drainage patterns at the project site, nor would it cause a substantial increase in impervious surfaces. The building would not introduce any new hazardous substances that could be accidentally introduced to the environment and conveyed by stormwater. Hence, the proposed Phase II facilities at the WTP site would not cause any significant hydrologic, hydraulic, or water quality impacts.

4.2.2.4 Mitigation Measures

The proposed WTP improvements under Phases I and II would not cause any significant hydrologic, hydraulic, or water quality impacts. Hence, no mitigation measures are required.

4.2.3 Foster Park

4.2.3.1 Existing Conditions

Rainfall Regime

The Ventura River originates in the Santa Ynez Mountains, and flows approximately 15 miles southward to its mouth at Emma Wood State Beach. The Ventura River watershed encompasses an area of approximately 226 square miles. The average annual precipitation in the watershed varies from approximately 17 inches at the coast to approximately 30 inches in the upper reaches of the watershed. There is an extreme seasonal variation in the rainfall and over 90 percent of the rainfall occurs between the months of November and April.

for groundwater in the Upper Ventura River Hydrologic Area are municipal water supply, industrial service water supply, industrial process water supply, and agricultural water supply. The groundwaters of the Upper Ventura River Hydrologic Subarea are not considered overdrafted.

4.2.3.2 Potential Impacts – Foster Park Phase I Facilities

Under Phase I, the City will install up to three new wells and associated piping in Foster Park and the City property north of the park, destroy Nye Well No. 1A, ~~install a rock groin at Nye Well No. 7,~~ increase peak water production (when needed and water is available), and establish a river monitoring program.

Water Quality Impacts – Construction Erosion and Stormwater Runoff

The proposed Phase I facilities would involve temporary grading and excavation at well pads and along pipeline routes in Foster Park and on the City property north of the park. With the exception of the construction of the rock groin at Nye Well No. 7, no work would occur on a river bank or in the river channel. Construction of the pipeline and well pads would occur on stream terraces elevated above the river channel that are only inundated during severe flood events. Hence, these work areas would not be exposed to river flows. However, they would be subject to potential water erosion if there was a significant rain event during or after the grading and installation of the well pads and pipes. Soils eroded from the work areas could enter the river if there was sufficient rainfall and runoff. Drainage from the terraces to the river occurs by overland flow and natural drainage features; no storm drains are present.

The potential to erode soils at the work site and cause sedimentation of the Ventura River is considered very low for several reasons. One, the temporary construction work areas associated with the pipes and well pads are located at least 40 feet from the top of the river bank, which provide space to implement erosion control measures and to allow natural attenuation of stormwater flows and percolation. The minimum distance from the proposed well pads and pipes to the top of the river bank are shown below:

	<u>Distance from River Bank</u>
Pipe in Foster Park	110 feet
Well No. 10	40 feet
Well No. 11	55 feet
Well No. 12	60 feet

Two, the City will need to prepare and implement a Storm Water Pollution Prevention Plan (SWPPP) and acquire coverage under the state's general construction activity stormwater permit for the construction activities at and near Foster Park. The SWPPP would ensure that Best Management Practices (BMPs) are employed to reduce exposure of soils during and after construction to rainfall, and to prevent off site sedimentation by use of barriers (e.g., silt fencing and hay bales) and temporary catchments.

Three, the City would return disturbed areas to pre-construction grades, stabilize these areas to prevent erosion, and landscape or seed the areas prior to the next winter rains to reduce erosion. For

Hydraulic modeling by Hawks & Associates (2003) indicated that velocities at the well pads during the 25-year event are less than 4 feet per second, which would not cause significant bank erosion of the river banks nor of the well pad slopes (Table 4-2). However, there is a greater potential for bank erosion at or near the wells under higher flow events. The City has determined that it is more cost effective to repair damaged well pads after a flood event, than to install bank protection or levees along the river near the well pads. Hence, there is a potential for the City to have to repair and reconstruct well pads for one or more wells damaged in future storm events. The most vulnerable wells are existing Nye Well Nos. 7 and 8, and Phase II Well Nos. 9 and 13 (Figure 24). The City would repair the damaged well pads by reconstructing them to pre-flooding dimensions using on-site materials. No hardened bank protection or levees would be used.

In summary, the installation of the new wells under Phases I and II would not significantly affect the 100-year flood base elevation. In addition, the wells would not exacerbate current bank erosion problems along the Ventura River, as they will be designed to be inundated and scoured without a hardened levee or bank protection that would typically deflect flood flows. **Overall, the proposed well layout and well pad maintenance and reconstruction after flood events would not have a significant impact on the hydraulic conditions in the river (Class III).**

Effect of Rock Groin at Well No. 7

~~The City has determined that extra protection from bank erosion is required for existing Nye Well No. 7 due to its vulnerability to bank erosion during the 50- and 100-year flood events. The well is not located adjacent to the current river main channel, as shown on Figure 24. However, Hawks & Associates (2003) recommend the use of a rock groin to deflect these flood flows and prevent the loss of the well pad. The approach to protecting Nye Well No. 7 is not consistent with the above-described approach of allowing well pads to be damaged and then reconstructing them. However, the City views the installation of a small rock groin as a reasonable solution that would have little environmental impact. The groin, as shown on Figure 18, would extend about 35 feet into the river channel, and would be about 10 to 15 feet in height. Flood flows impinging upon the groin would be deflected. The impact on the hydraulic conditions of the river would be minor and less than significant (Class III) because only very high and infrequent flows would impinge on the groin, and the deflect flows are not expected to cause any downstream bank erosion due to the great width of the river channel at this point (Hawks and Associates, 2003). [move to Phase II section]~~

Effect on Groundwater Conditions

The City seeks to increase the peak or instantaneous production rate from the Foster Park facilities to the range of 8,500 - 10,500 gpm. Current peak production is estimated to be 4,650 gpm. The additional 4,000 to 6,000 gpm production capacity would be provided by a combination of modifications to existing Nye Well Nos. 7 and 8, and up to five new wells under Phases I and II. (The target peak production rate may or may not be achieved with only the proposed Phase I wells).

As described in Section 2.2.4, the long-term average annual production from the Foster Park facilities would remain the same under the proposed Project – that is, about 6,700 acre-feet per year (which is equivalent to a year-round continuous diversion rate of 4,150 gpm). However, the City

would have the ability to increase production during periods of higher water availability in the Ventura River watershed (e.g., winters with high runoff). This flexibility in pumping rates would allow the City to reduce water production from the Ventura River during other periods when water availability is low, or when the flows are important for supporting aquatic habitat.

Under the proposed Project, the peak or instantaneous well production rates would be increased to 8,500 to 10,500 gpm for several weeks to months during the winter and spring (i.e., December to April) when aquifer conditions in the river alluvium are favorable, and then reduced over time to maintain the average annual production of about 6,700 acre feet per year from Foster Park. The increased water production facilities would increase the instantaneous withdrawals from the river alluvium compared to historic rates (about 4,000 to 5,000 gpm) when there were only 3 or 4 wells with the subsurface collector and surface diversion. The increased instantaneous production could reduce flows to the river alluvium downstream of Foster Park. It is not possible to accurately predict the potential effect that the increased withdrawals may have on groundwater levels in the Lower Ventura River Basin, between Foster Park and the Ojai Valley Sanitary District treated effluent outfall. However, this basin is very small (about 1,400 acre-feet capacity), and therefore, would be very sensitive to reductions in inflows.

Depending on the year and amount of runoff, the increased production could reduce groundwater levels along this reach for several weeks to days, depending upon the duration of the higher water production at Foster Park. A reduction in alluvial groundwater levels could, in turn, affect riparian vegetation along this portion of the river, which is addressed in Section 4.3. The impact could extend both upstream and downstream, depending upon the magnitude of the drawdown at Foster Park and the upstream and downstream groundwater conditions. The extent of the effect cannot be reliably estimated.

The magnitude of this impact is expected to be minor because the high production rates would only occur for weeks to months when water is abundant in the river and the alluvium is saturated throughout the lower river. In addition, the impact would be temporary and reversible once the production rates return to lower levels. **However, because this impact cannot be accurately predicted, it is considered a potentially significant impact (Class II)** that can be mitigated by reducing the higher water production from Foster Park when it could cause adverse upstream and downstream impacts (Mitigation Measure W-5). This mitigation measure would require that the proposed river monitoring program be expanded to include upstream and downstream groundwater conditions.

4.2.3.3 Potential Impacts – Phase II Facilities (Program Level Analysis)

Under Phase II, the City will install up to two new wells (including one on the west side of the river) and associated piping (which would include a pipe across the Ventura River), destroy Nye Well No. 2 in the river channel and abandon the associated piping, relocate the subsurface collector in the river channel to Foster Park, remove the surface water diversion facility, notch the top of the exposed subsurface dam, and install a new water pipe in Foster Park, increase peak water production (when needed and water is available), install rock groin at Well No. 7, and continue the river monitoring program.

Water Quality Impacts – Well Testing

The impact of discharging groundwater to the Ventura River during Phase II well testing would be the same as for the Phase I well testing – a less than significant impact (Class III).

Effects on Hydraulic Conditions and Flooding

The work in the river under Phase II has the potential to alter the river channel due to earthmoving and trenching activities at and near the subsurface collector. The changes in hydraulic conditions cannot be predicted at this time without more information on the extent of grading, and the need, if any, to restore and stabilize river banks. At this time, **this impact is considered potentially significant, but mitigable (Class II)**. A significant impact can be avoided by incorporating considerations of geomorphology and river hydraulics in the grading and post-construction restoration plans (Mitigation Measure W-6).

Effects on Groundwater Levels

The potential impacts on upstream or downstream groundwater conditions due to increased peak water production with Phase II facilities would be the same as for Phase I - **potentially significant impact (Class II) that can be mitigated** by restricting production from Foster Park when it could cause adverse upstream or downstream impacts (Mitigation Measure W-5).

Effect of Rock Groin at Well No. 7

The City has determined that extra protection from bank erosion is required for existing Nye Well No. 7 due to its vulnerability to bank erosion during the 50- and 100-year flood events. The well is not located adjacent to the current river main channel, as shown on Figure 24. However, Hawks & Associates (2003) recommend the use of a rock groin to deflect these flood flows and prevent the loss of the well pad. The approach to protecting Nye Well No. 7 is not consistent with the above-described approach of allowing well pads to be damaged and then reconstructing them. However, the City views the installation of a small rock groin as a reasonable solution that would have little environmental impact. The groin, as shown on Figure 18, would extend about 35 feet into the river channel, and would be about 10 to 15 feet in height. Flood flows impinging upon the groin would be deflected. The impact on the hydraulic conditions of the river would be minor and less than significant (Class III) because only very high and infrequent flows would impinge on the groin, and the deflected flows are not expected to cause any downstream bank erosion due to the great width of the river channel at this point (Hawks and Associates, 2003). [moved from Phase I section]

4.2.3.4 Mitigation Measures

- W-1 The Contractor's SWPPP and erosion control plan for Phase I and II work in and adjacent to the Ventura River shall specifically include Best Management Practices (BMPs) to reduce exposure of graded soils, excavated trenches, and stockpiles to rainfall; to prevent off-site sedimentation from upland construction work areas that could reach the Ventura River; and

- Following the installation of facilities on stream terraces above the river, the disturbed areas shall be landscaped with container plants, seeds, or turf to stabilize the soils and prevent erosion during the next winter rains. The plant/seed mix, planting density, and installation methods shall be determined based on the type of cover to be restored and site conditions. Disturbed areas north of Foster Park shall be restored with native herbs, grasses, shrubs, and trees. The City shall monitor the progress of the landscaping and native restoration, and ensure that it provides erosion protection during the subsequent winter. If necessary, additional erosion control BMPs (e.g., erosion control blankets) and supplemental landscaping shall be implemented if the initial efforts are not successful.

W-2 A focused SWPPP and erosion control plan shall be prepared for the destruction of Nye Well No. 1A due to its proximity to the river. It shall include the following elements:

- The work shall only occur during the period 1 April through 1 December to avoid rainfall, if feasible
- All temporary stockpiles shall be placed at least 50 feet from the top of bank
- A silt fence and exclusion fence shall be placed 5 feet from the top of bank to prevent entry by equipment or personnel during the work.
- The Contractor must take all reasonable measures to prevent the discharge of any turbid stormwater, sediment, water used or generated from the abandonment process, lubricants, and concrete from the work area to the Ventura River.
- Any discharge of water used in the abandonment of the well must be directed to an upland area for dissipation of energy and removal of sediments or contaminants prior drainage to the river. Such discharges must be conducted with an approved NPDES permit from the Regional Water Quality Control Board.
- Following the destruction of the well and well pad, the disturbed areas shall be landscaped with native riparian trees and shrubs to help stabilize the highly eroded bank at the site. A restoration plan shall be prepared that specifies the soil treatment, planting methods, plant palette, 3-year performance criteria, and a 3-year maintenance and monitoring program. The City shall monitor the progress of the restoration, and ensure that it provides erosion protection during the winter. If necessary, additional erosion control BMPs and supplemental landscaping shall be implemented if the initial efforts are not successful.
- The post-abandonment grading shall establish a drainage pattern that does not exacerbate the current eroded conditions of the river bank at the well pad.

W-3 The Contractor's SWPPP and erosion control plan shall specifically include Best Management Practices (BMPs) to prevent discharge of construction materials, contaminants, washings, concrete, fuels, drilling fluids, and oils into the Ventura River. BMPs shall include the following measures (among others):

- All construction vehicles and equipment that enter the construction and grading areas will be properly maintained (off-site) to prevent leaks of fuel, oil and other vehicle fluids.
- Conduct equipment and vehicle fueling off-site. If refueling is required at the project site, it will be done within a bermed area with an impervious surface to collect spilled fluids. No refueling shall occur in the river.

Aquatic Habitat in the River

The Ventura River at Foster Park contains year-round flows with aquatic habitat, including runs, riffles, and pools. At the project site, run habitat was most prevalent, followed by pools. The average live stream width in the reach in June 2003 was approximately 30 feet. Depth averaged about 1.5 feet. The average maximum depth in pools was 2 feet. Substrate in the main channel was dominated by small cobble, with lesser amounts of boulder, gravel, sand, and silt. Filamentous green algae was present in all areas, primarily as a thick carpet or in large patches.

Wildlife along the River

The Ventura River provides a corridor for wildlife movement through the valley. Although vegetation cover is not contiguous, the riparian habitat is a valuable refuge with food and native vegetation. Species that could forage and take cover in this habitat include the western fence lizard, common kingsnake, gopher snake, common garter snake and bird species such as song sparrow, Anna's hummingbird, wrentit, black phoebe, western kingbird, house wren, swallow and bushtit.

Sensitive Species

Southern Steelhead Trout

Southern steelhead trout (*Oncorhynchus mykiss irideus*) is listed as a threatened species by the National Marine Fisheries Service (NMFS) and a Species of Concern by California Department of Fish and Game. Southern steelhead is an anadromous fish species that occurs in coastal streams and creeks of Central and Northern California, and southern Oregon. Southern steelhead are known to historically use coastal streams as a migration corridor both during upstream movement to spawning areas in the Santa Ynez Mountains, and downstream movement to the ocean.

A population of southern steelhead occurs in the Ventura River watershed. Steelhead spawning habitat is present in Matilija Creek, the North Fork of Matilija Creek, San Antonio Creek, Lion Creek, Thatcher Creek, and Reeves Creek. Steelhead spawning and rearing habitat along the mainstem is only present along the "live stretch," which extends from San Antonio Creek to Foster Park. Spawning and rearing habitats are present along the river at Foster Park. Hence, steelhead ~~could only~~ occur in the Ventura River near Foster Park as both transitory adults or smolts in the winter and spring, and as young of the year in the summer.

Red-legged Frog

The red-legged frog is a federal threatened species. It occurs in coastal lagoons, marshes, springs, permanent and semi-permanent natural ponds, ponds and backwater portions of streams, and small artificial impoundments. Potential habitat in the watershed includes the mainstem of the river immediately upstream of the Main Street Bridge; downstream of Shell Road; and several sites between the OVSD treatment plant and Foster Park where there are larger established trees providing shade, rootwads, and undercut banks. Much of San Antonio Creek provides suitable habitat due to the presence of a well-established riparian canopy providing shelter and shade, and

4.3.3.2 Potential Impacts – Foster Park Phase I Facilities

Under Phase I, the City will install up to three new wells and associated piping in Foster Park and the City property north of the park, destroy Nye Well No. 1A, ~~install a rock groin at Nye Well No. 7,~~ increase peak water production (when needed and water is available), and establish a river monitoring program.

Effects on Habitat

Installation of the three new wells in and near Foster Park (Nos. 10, 11 and 12) would result in the permanent loss of non-native weedy vegetation at each location. In addition, the construction of the well pads, including excavation of a pit to construct the belowground concrete casing, would cause a temporary disturbance to the same type of vegetation that surrounds the well pad sites. An estimate of the temporary and permanent disturbance areas at each site is presented below in Table 4-3. **The temporary disturbance and the permanent loss of these non-native vegetation types at each well site is considered an adverse, but less than significant impact (Class III)** because of the small area involved and the predominance of non-native weeds. Although the loss of vegetation at the well sites is not considered significant, the loss of vegetative cover, albeit non-native, can be offset by restoring temporarily disturbed areas and the well pads with native plants, as described in Mitigation Measure BIO-2.

**TABLE 4-3
ESTIMATE OF HABITAT AND TREE IMPACTS FOR PROPOSED WELLS**

	Temporary Disturbance due to Excavation, Stockpiling, and Earthwork (square feet)	Permanent Loss due to Well Pad Construction (square feet)	Number of Native Trees Removed
Well No. 10	2,100	5,000	None
Well No. 11	800	5,000	One 6" coast live oak
Well No. 12	800	5,000	None

The pipeline to serve Well Nos. 10, 11, and 12 north of Foster Park would traverse similar non-native vegetation types along the existing dirt road. The pipeline corridor would be restored after construction to previous grade, and seeded to prevent erosion. **The temporary disturbance the non-native vegetation type along the corridor is considered an adverse, but less than significant impact (Class III)** because the impact would be temporary and reversible. Although the impact is not considered significant, the disturbance of the local vegetative cover, albeit non-native, can be offset by restoring the pipeline corridor with native plants, as described in Mitigation Measure BIO-2.

Construction of the well pad for Well No. 11 would result in the removal of a 6-inch diameter coast live oak tree in the center of the site. Installation of the pipeline north of Foster Park to serve the new wells would also result in the removal of an 8-inch coast live oak and a 6-inch walnut tree that are located in the pipeline corridor. **The loss of native trees is considered a significant, but**

mitigable impact (Class II). This impact would be reduced to less than significant levels by replacing the trees at the project site (Mitigation Measure BIO-3).

The pipeline corridor in Foster Park would not traverse any native or non-native vegetation types. Areas that would be temporarily affected include turf, barren dirt, and paved areas. At this time, it does not appear that any native or ornamental trees would be removed for the installation of the pipeline in Foster Park. However, there is a potential to damage large native trees adjacent to the pipeline route during construction. The potential damage of large native trees, such as sycamore or coast live oak trees, is considered a significant, but mitigable impact (Class II). This impact would be reduced to less than significant levels by avoiding the trees to the maximum extent feasible (Mitigation Measure BIO-4), and where avoidance is not feasible, the City would replace native trees at the project site (Mitigation Measure BIO-3).

Destruction of Nye Well No. 1A would not remove any native or non-native habitat, or any native trees. Work would occur in mostly barren areas at the well pad. The abandoned pad would be returned to natural grade and seeded with native plants to prevent erosion.

Water Quality Impacts – Construction Erosion and Stormwater Runoff

As described in 4.2.3.2, the construction of the proposed Phase I facilities could cause erosion and sedimentation impacts that could affect aquatic habitat in the Ventura River. However, significant erosion of graded areas and sedimentation impacts would be avoided by implementation of a Storm Water Pollution Prevention Plan (SWPPP) that contains Best Management Practices (BMPs) to reduce exposure of soils to rainfall, and to prevent off site sedimentation by use of barriers and temporary catchments. In addition, the City would return disturbed areas to pre-construction grades, stabilize these areas to prevent erosion, and landscape or seed the areas prior to the winter rains to reduce erosion. Installation of the Phase I facilities are not expected to cause increased sediment and turbidity in stormwater runoff to the river. Hence, no impact to aquatic habitats or species in the river is anticipated.

Water Quality Impacts – Well Testing

As described in 4.2.3.2, the discharge of groundwater to the Ventura River during well testing would not cause a significant impact on water quality in the Ventura River for the following reasons: (1) groundwater from the river alluvium (which is used for drinking water) exhibits high quality and does not contain pollutants; and (2) the City would acquire a Waste Discharge Requirement from the Regional Water Quality Control Board to discharge groundwater to the river. The permit would include conditions to ensure that no water quality standards would be exceeded, and that sediment and turbidity levels are not increased in the river during the discharge. Hence, no significant impact to aquatic habitat or sensitive species (i.e., southern steelhead) is anticipated.

Effect of Rock Groin at Well No. 7

Installation of the rock groin at Nye Well No. 7 would result in the temporary disturbance of about 1,800 square feet of riparian scrub habitat, and permanent loss of about 900 square feet of riparian scrub habitat. The groin, as shown on Figure 18, would extend about 35 feet into the river channel.

~~These impacts are considered potentially significant, but mitigable (Class II) because they involve habitat disturbances within the river channel. The impacts can be mitigated by restoring the temporarily disturbed areas after construction, and providing compensatory habitat restoration for the permanent habitat losses, as described in Mitigation Measure BIO-5. [move to Phase II section]~~

Effects on Aquatic Habitat and Sensitive Species due to Pumping

Under the proposed Project, the peak or instantaneous well production rates would be increased to 8,500 to 10,500 gpm for several weeks to months during the winter when aquifer conditions in the river alluvium are favorable, and then reduced over time to maintain the average annual production of about 6,700 acre feet per year from Foster Park. The increased water production facilities would increase the instantaneous withdrawals from the river alluvium compared to historic rates (about 4,000 to 5,000 gpm) when there were only 3 or 4 wells with the subsurface collector and surface diversion. The increased instantaneous production could reduce flows to the river alluvium downstream of Foster Park. It is not possible to accurately predict the potential effect that the increased withdrawals may have on groundwater levels in the Lower Ventura River Basin, between Foster Park and the Ojai Valley Sanitary District treated effluent outfall. However, this basin is very small and therefore, would be very sensitive to reductions in inflows.

Depending on the year and amount of runoff, the increased production could reduce groundwater levels along river downstream of Foster Park for several weeks to days, depending upon the duration of the higher water production at Foster Park. A reduction in alluvial groundwater levels could, in turn, affect riparian vegetation and aquatic habitat along this portion of the river. The impact would end near the OVSD wastewater treatment plant where year-round discharges of treated effluent maintain the river alluvium in a full condition. It is also possible that a drawdown at Foster Park could affect upstream groundwater levels, and associated riparian vegetation and aquatic habitat.

As described in Section 2.2.4, the long-term average annual production from the Foster Park facilities would remain the same under the proposed Project – that is, about 6,700 acre-feet per year. However, the City would have the ability to increase production during periods of higher water availability in the Ventura River watershed (e.g., winters with high runoff). This flexibility in pumping rates would allow the City to reduce water production from the Ventura River during other periods when water availability is low, or when the flows are important for supporting aquatic habitat.

The magnitude of this impact is expected to be minor because the high production rates would only occur for weeks to months when water is abundant in the river and the alluvium is saturated. In addition, the impact would be temporary and reversible once the production rates return to lower levels. **However, because this impact cannot be accurately predicted, it is considered a potentially significant impact (Class II).** A significant impact can be avoided by reducing the well production when such production rates are shown to be responsible for causing adverse upstream or downstream impacts to groundwater levels and associated riparian or aquatic habitat (Mitigation Measures W-5 and BIO-6). These mitigation measures would require that the City's proposed river monitoring program be expanded to include upstream and downstream groundwater conditions, and that the program include biological monitoring parameters.

The increased peak water production could also cause localized drawdowns in the water levels in the river alluvium at Foster Park, upstream of the submerged dam. The drawdowns could adversely affect surface water in the river, reducing surface flows and drying up ponds. In addition, it could adversely affect riparian vegetation and wetlands associated with high water levels in the river alluvium at Foster Park. It is not possible to accurately predict the potential effect that the increased withdrawals may have on surface water and riparian vegetation.

Fugro (1996) conducted hydrogeologic investigations to determine if there is sufficient groundwater levels to support a higher pumping rate. They used a combination of aquifer testing and simulation modeling. Their results indicated that pumping from the Nye Wells can affect surface water within 1,000 feet. The effect is most pronounced when surface water flows and groundwater levels are low in the project area. When the river flows are 1 to 2 feet deep, it appears that the maximum proposed pumping rates would not cause any localized drawdowns.

Depending on the year and amount of runoff, the increased production could reduce groundwater levels, which in turn, could affect the amount of surface water and condition of riparian vegetation along the river at Foster Park. Suitable habitat for the southern steelhead and southwestern pond turtle would be adversely affected if the areal extent and depth of ponds are reduced. Because this impact cannot be accurately predicted, **it is considered a potentially significant impact (Class II)**. This impact can be mitigated to a less than significant level by restricting production from the City's wells when such production rates are shown to be responsible for causing adverse impacts on aquatic habitat and riparian vegetation in the river at Foster Park (Mitigation Measure BIO-6). This mitigation measure would require that the proposed river monitoring program be expanded to include surface water and riparian vegetation conditions.

4.3.3.3 Potential Impacts – Phase II Facilities (Program Level Analysis)

Under Phase II, the City would install up to two new wells (including one on the west side of the river) and associated piping (which would include a pipe across the Ventura River), remove Nye Well No. 2 in the river channel and associated piping, relocate the subsurface collector in the river channel to Foster Park, remove the surface water diversion facility, notch the top of the exposed subsurface dam, and install new raw water pipe in Foster Park, increase peak water production (when needed and water is available), install rock groin at Well No. 7, and continue the river monitoring program.

Because the construction methods and limits for the Phase II facilities are unknown at this time, an additional environmental review for these facilities will be conducted by the City, and will specifically address biological impacts. The environmental review will tier from this Program EIR. Mitigation measures recommended for Phase II facilities will be refined through the subsequent environmental review. A programmatic impact assessment of Phase II facilities is presented below.

when it could cause adverse impacts to aquatic habitat and riparian vegetation (Mitigation Measure BIO-6).

Effect of Rock Groin at Well No. 7

Installation of the rock groin at Nye Well No. 7 would result in the temporary disturbance of about 1,800 square feet of riparian scrub habitat, and permanent loss of about 900 square feet of riparian scrub habitat. The groin, as shown on Figure 18, would extend about 35 feet into the river channel. These impacts are considered potentially significant, but mitigable (Class II) because they involve habitat disturbances within the river channel. The impacts can be mitigated by restoring the temporarily disturbed areas after construction, and providing compensatory habitat restoration for the permanent habitat losses, as described in Mitigation Measure BIO-5. [moved from Phase I section]

4.3.3.4 Mitigation Measures

BIO-2 The City shall prepare a post-construction habitat restoration plan that specifies the methods and materials to restore native plants to the areas disturbed during the installation of new facilities at and near Foster Park that result in the loss of both native and non-native habitats (excluding turf, landscaped and barren areas in Foster Park). The plan shall include pre-planting site treatment (such as weed eradication and soil preparation), establishing plants by seed and/or container plants, and a 3-year maintenance and monitoring program to ensure successful establishment of native plants that can persist under natural conditions and rainfall. All plants or seeds used for re-vegetation should be derived from local genetic stock, as available. The seed mix and application rate, species mix, and planting density shall be specified in the plan. All disturbed areas shall be prepared prior to re-vegetation by removing weeds, scarifying the soil surface, and returning topography to pre-project conditions. Native plants shall be planted in the first winter following completion of construction and irrigated as necessary to achieve the target growth and survival rates. This measure applies to areas temporarily disturbed during pipe installation and well pad construction, as well as to the side slopes of the well pads.

BIO-3 The City shall replace all native trees (4 inches in diameter or more) removed for the well pads and pipeline on City property north of Foster Park. Tree shall be replaced at a 3:1 ratio at sites with suitable soil, exposure, and drainage conditions. The City shall prepare a post-construction tree replacement plan that specifies the methods and materials to replace native trees. The plan shall include pre-planting site treatment (such as weed eradication and soil preparation), tree propagation and installation methods, pest and predator protection, and a 3-year maintenance and monitoring program to ensure successful establishment of the trees under natural conditions and rainfall. All trees should be derived from local genetic stock, as available. Trees shall be planted in the first winter following completion of construction and irrigated as necessary to achieve the target growth and survival rates.

BIO-4 The proposed well pads and pipeline routes shall be located and configured to avoid removal of any large native trees, to the extent feasible. The City shall consult with an arborist when developing the limits of the proposed well pads and the pipeline routes to ensure maximum

Well No. 7 in order to allow native plants to colonize the treated area. Giant reed shall be removed and excluded from the treated area for three years.

- BIO-6 The proposed River Monitoring Program shall incorporate biological habitat monitoring to detect and evaluate potential adverse effects on aquatic habitat and riparian vegetation in the river due to reduced alluvial groundwater levels at, upstream, and downstream of Foster Park. The monitoring shall be designed to detect changes in sizes and depths of pools and live streams, water temperatures, and riparian plant conditions, and to determine if such changes are due to peak production from the City's proposed new and modified wells at and near Foster Park ~~that exceed the historic peak well production rates~~. The City shall collect and review the biological data at sufficient frequency intervals to provide a reliable factual basis to determine if there is a measurable effect on aquatic habitats and riparian vegetation that is attributable to a change in groundwater level due to peak well production. ~~that exceed historic rates~~. If such an effect is detected, the City shall evaluate whether the changes are sufficient to affect the condition of fish (including the southern steelhead) and riparian vegetation ~~plants in consultation with USFWS and NMFS~~. If there is a potential to significantly affect these resources due to ~~increases in peak well production rates from the new and modified wells~~, the City shall ~~reduce~~ modify pumping to reduce or eliminate the impact. The program shall include the groundwater monitoring criteria from Mitigation Measure W-5. The biological monitoring program shall include measurable criteria and thresholds developed with US Fish and Wildlife Service and NOAA Fisheries, and specific adaptive management actions to be implemented when adverse impacts are detected. Such actions may include reducing peak pumping for a specified duration, modifying the time of day for certain pumping rates, modifying the number and locations of wells pumping at a certain rate, and other modifications of the pumping regime that would reduce impacts. The biological monitoring program and adaptive management actions shall be consistent with the results of the Section 7 endangered species consultation for this project between the Environmental Protection Agency (the funding source) and US Fish and Wildlife Service and NOAA Fisheries. The increased peak pumping regime using the new and modified wells shall not commence until this consultation process has been completed, and US Fish and Wildlife Service and NOAA Fisheries have approved, or concurred with, the biological monitoring and adaptive management program developed pursuant to this mitigation measure.

The property does not appear to be potentially eligible for listing under NRHP Criterion B (CRHR Criterion 2), as it is not known to be associated with any individuals of historic importance. The property, and in particular the treatment plant, may be eligible for listing under NRHP Criterion C (CRHR 3) as a scarce example of a waterworks facility constructed with PWA funding. The distinctive characteristics of this engineering facility include the use of Spanish Colonial Revival architecture, as well as the components of the plant (buildings, basins and reservoirs) all combining to represent the latest in water quality engineering technology in 1939. When the Power Reservoir roof was constructed, covering four acres and supported by a system of 4,000 precast concrete units, it was identified in a contemporary engineering trade journal as being "a project of notable importance" (Nutter, 1939: 413).

The project architects were Taylor and Taylor of Los Angeles, a firm consisting of brothers Edward Gray Taylor and Ellis Wing Taylor. Edward Taylor studied architecture and engineering at Columbia University in New York before opening an office in Los Angeles in 1912. Both men had been employed by Donald Douglas and designed the original buildings of the Douglas aircraft factory in Santa Monica. Edward Taylor worked as an architect until the early 1940s, and died in 1946. Ellis Taylor died in 1951. No information was located to suggest that the architects should be regarded as "masters," in terms of the NRHP criteria (Withey, 1956: 590).

NRHP Criterion D (CRHR Criterion 4) is not applicable in this report because it refers to archaeology.

Integrity Discussion

The property as a whole possesses integrity of **location** (the property has not been moved). The Administration Building has retained its integrity of **design, materials and workmanship**; only minor, unobtrusive and reversible alterations and additions have occurred to the building. The remaining buildings and engineering structures (water basins, submerged dam, intake building, and reservoirs) have also largely retained their integrity of design and materials, although the addition of a small number of new buildings and structures in 1973 (storage, garage, washwater basin, and sludge dewatering unit) somewhat diminishes the physical relationship between the historic buildings and structures. The reconstruction of the roof on Power Reservoir in 1994 also somewhat diminished this structure's integrity of design and materials.

The **setting** (physical environment of a historical property) is largely intact. The property was constructed in a rural setting, in which it continues to reside today, with the exception of the relatively recent intrusion of the nearby Ojai Freeway (SR 33). The property has retained its integrity of **feeling** (a property's expression of the aesthetic or historic sense of a particular period of time) and its **association** (the direct link between an important historic event or person and a historic property) because the property has continued to be used actively for its original purpose.

This property has retained a sufficient level of integrity to be regarded as eligible for listing on the NRHP under criteria A and C. Properties which are eligible for listing on the NRHP are also presumptively eligible for the CRHR. The contributing and noncontributing buildings and structures are summarized in Table 4-4, below.

of Ventura and improvement with PWA funds in 1939. The development of reliable water sources for domestic, agricultural and industrial purposes was essential to the city's successful growth and development. This importance was expressed by the construction of the modern treatment plant in 1939, a significant event in that history that solved the problem of poor water quality that had plagued the City's water system since its inception.

The treatment plant also appears to be eligible for listing as a City Landmark under criterion (4). The prominent three-story administration building surrounded by basins and reservoirs reflects an industrial waterworks building with an impressive Spanish Colonial Revival design. Partially funded by a Public Works Administration (PWA) grant, this project was the largest in terms of cost built in the City of Ventura and perhaps in the county as a whole. Other city PWA projects included the Post Office, Ventura Junior High School and Ventura Junior College, Ventura High School and County Hospital Isolation Ward.

The PWA was one of several programs established by Congress during the Depression. Between 1933 and 1939, 26,000 federal and nonfederal projects were constructed not only to relieve unemployment, but "to provide decent housing for the poor, to bring better public buildings of all types to Americans, to modernize America through roads, water systems and electricity, and to wrest from private interests the right to operate public utilities." (Short, 1986: VII) The water treatment plant is an excellent example of a well-designed public building that addressed the long-standing need of modernizing the Ventura water system.

4.5.6 Potential Impacts – Phase I and II Facilities

Under Phase I, the City would complete the following WTP modifications and improvements: modify Kingston Reservoir; install new wastewater recovery basins; install new sludge drying beds; install new electrical system; install return water pre-treatment system; install source water pumps and automatic feed strainers; construct settled water pipeline and coagulant addition system; construct new chemical system and building; and construct membrane units and building; and complete public art project. The ramp on the north side of the existing Administration Building will be removed during Phase II. The chemical storage tanks on the second and third floors of the existing Administration Building would be removed, and the laboratory facilities would be provided in the new Membrane Building. The sedimentation basin and flocculator on the west side of the Administration Building would be removed along with the existing chlorine storage area, if funding allows, during the above construction activities. If there are insufficient funds in Phase I, the basins will be decommissioned (i.e., drained of water) and maintained in their current condition until Phase II.

The above modifications to the WTP site under Phase I would result in the following impacts to the historic resources identified at the site, as listed in Table 4-3. **These impacts are considered significant, but mitigable (Class II).**

Phase I Impacts

- **Impact 1a.** The removal of the western sedimentation basin, flocculator, and chlorine storage area, ~~and delivery ramp~~ will result in a substantial loss of design integrity, and to a more limited

on design and interpretive measures. The following measures should to be incorporated into the project design, mitigation program, and/or environmental document produced for the Project.

Phase I Mitigation

- HR-1 In consultation with a qualified historic preservation professional, the historically significant buildings and structures and features listed in Table 4-4 which will be modified or removed shall be documented in accordance with National Park Service's Historic American Building Survey/Historic American Engineering Record (HABS/HAER) standards. This documentation shall include archival quality photographs of exterior features, elevations and significant interior features. Scaled, "as built" site plan and floor plans shall also be produced where existing plans or records will not suffice. The documentation package shall be archived at an appropriate location to be determined by the City.
- HR-2 In consultation with a qualified historic preservation professional, the City shall produce an onsite and/or offsite interpretive plan for the property focused on the history of water in Ventura in general and the role of the Avenue Water Treatment Plant in particular. The interpretative plan may consist of but not be limited to monuments, plaques or other publicly-available, permanent displays of pertinent historical information. To the greatest extent feasible, the proposed public art project planned for the site shall be combined with the interpretive plan in a manner which conforms to the *Secretary of the Interior's Standards for the Treatment of Historic Properties*, and aids in the interpretation of the historic themes.
- HR-3 To the greatest extent feasible, all modifications to historic building and structures on the property shall be undertaken in conformance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties*. These alterations shall not unnecessarily destroy historic materials or architectural features that characterize the property. Particular attention shall be given to addressing any structural and architectural issues related to the removal of ~~the ramp on the northern side of the Administration Building and the western sedimentation basins.~~ These plans shall be prepared in consultation with a qualified historic preservation professional.

Phase II Mitigation

- HR-4 In consultation with a qualified historic preservation professional, all historically significant buildings and structures listed in Table 4-4 which will be modified or removed shall be documented in accordance with National Park Service's Historic American Building Survey/Historic American Engineering Record (HABS/HAER) standards. This documentation shall include archival quality photographs of exterior features, elevations and significant interior features. Scaled, "as built" site plan and floor plans shall also be produced where existing plans or records will not suffice. The documentation package shall be archived at an appropriate location determined by the City.
- HR-5 To the greatest extent feasible, the construction of the new administration building, and alterations to the existing Administration Building required meet seismic requirements and for adaptive reuse, shall be undertaken in conformance with the *Secretary of the Interior's Standards*

extent, integrity of feeling and association, for the WTP. This is due to a reduced ability to interpret the functional relationships between these features and the operation of the WTP as a whole.

- **Impact 1b.** The removal of the western sedimentation basin and flocculator may result in structural and/or design alterations to the adjacent Administration Building to which they are closely related visually, and physically attached.
- **Impact 1c.** The construction of new water treatment facilities may result in the loss of historic features and/or the introduction of elements which are out of character with the historic property, and therefore a reduction in integrity of design for the WTP.
- **Impact 1d.** The functional abandonment of the eastern sedimentation basin and flocculator and its potential modification to accommodate a public art project will result in a reduction of feeling and association integrity for the water treatment plant, due to a reduced ability to interpret the functional relationships between these features and the operation of the WTP as a whole. A loss of design integrity may also result, depending on the design of the public art project.

Phase II Impacts

Pending adequate funding in Phase II, the City would construct a new Administration Building, as shown on Figure 8b. The old Administration Building would either be used for storage of records and light equipment, or would be modified for seismic safety to allow partial use of the building for educational tours or displays for plant visitors. The latter use would require seismic upgrading of the entire building using reinforced concrete shear walls and foundation improvements. Fire sprinklers and a heating/ventilation/air conditioning system would also be provided.

Under Phase II, the City will remove the historic subsurface collector and surface water diversion in the river channel to Foster Park and notch the top of the exposed subsurface dam. No other historic features would be affected.

The above modifications to the WTP site and at Foster Park under Phase II would result in the following impacts to the historic resources identified at the site, as listed in Table 4-4. **These impacts are considered significant, but mitigable (Class II).**

- **Impact 2a.** The construction of a new Administration Building would likely result in a reduction in design integrity for the WTP as a whole.
- **Impact 2b.** The adaptive reuse of the Administration Building and possible removal of the ramp may result in the loss of historic features within the building which are important to interpreting its historic function, as well as requiring structural modifications which are out of character with the building.
- **Impact 2c.** The removal of the surface diversion and subsurface collector at Foster Park would result in a loss of design integrity for the property and reduce the ability to interpret the functional relationships between these features and the operation of the WTP as a whole.

require many years to replace; and (2) short-term construction related noise that could affect several residences near the WTP and Foster Park.

A potential alternative that would avoid the willow tree loss would be to retain the current earthen sludge drying beds and continue their use. This alternative is not considered feasible because the new treatment process requires a greater area for sludge dewatering than provided by the existing sludge drying beds. Hence, the existing beds would need to be enlarged for the new treatment process under any circumstances. No additional space is available on the WTP site for this purpose due to the severe space limitations and the need for new equipment at other locations on the site. Hence, this alternative is not considered feasible.

There is no feasible alternative to avoid the short-term construction related noise impact at the WTP and Foster Park sites. There are no alternative construction methods or equipment that would be feasible, cost effective, and less noisy than the proposed conventional equipment.

5.4 ALTERNATIVE TREATMENT PROCESSES

The City conducted a thorough evaluation of an alternative treatment process - ozonation/direct filtration. The City determined that it would be less desirable than the proposed ultrafiltration process because it would have more complex operations, involve the use of a toxic substance (i.e., ozone), and present more limitations on meeting future drinking water regulatory requirements. However, there would be no significant difference in the environmental impacts of an ozone treatment alternative compared to the proposed Project.

5.5 ALTERNATIVE WELL LOCATIONS AT FOSTER PARK

The City conducted a detailed evaluation of well locations at Foster Park (Fugro, 2002). The proposed locations were based on the desire to avoid placing wells in or near the river channel, while locating wells to maximize water production. Alternative well locations that are further from the river would not provide the water production required by the City, and as such, would not meet the Project objectives.

The City examined the use of a subsurface well gallery (Ranney collector) installed upstream of the subsurface dam. While this type of facility is very effective and may exhibit the desired water production rates, it would require significant excavation of the river channel, diversion of the river during construction, and temporary dewatering of the river alluvium. Hence, this alternative would have substantially greater impacts than the proposed Project.

5.6 ALTERNATIVE BANK PROTECTION FOR WELL NO. 7

There are two alternatives to the proposed rock groin at Well No. 7: (1) eliminate the rock groin and increase the exposure and likelihood of damage to the well pad from flood flows, with the understanding that the pad will be reconstructed after any damage; and (2) install grouted rock rip-rap on the banks of the well pad to armor it from erosive flood flows instead of using a rock groin that protrudes into the river. The first alternative would avoid the impacts to riparian habitat associated with the rock groin, although it may require more frequent repairs of the well pad banks

6.0 CUMULATIVE IMPACTS

Under CEQA Guidelines Section 15130, an EIR must discuss cumulative impacts of a project when the project's incremental effect is "cumulatively considerable," which means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects (Section 15065). Section 15355 of the CEQA Guidelines defines cumulative impacts as two or more individual effects, that when considered together, are either considerable or compound other environmental impacts. These cumulative impacts are changes in the environment that result from the incremental impact of the proposed project and other nearby related projects. Other nearby current and future projects are listed below:

- Ongoing maintenance of the Casitas Springs Levee along the Ventura River by the Ventura County Watershed Protection District
- Proposed Raising of the Casitas Springs Levee along the Ventura River by the Ventura County Watershed Protection District
- Ongoing domestic well production in the Upper Ventura River Basin
- Ongoing municipal water production from the Upper Ventura River Basin by the Meiners Oaks County Water District, Casitas Springs Mutual Water Company, and Ventura River County Water District, upstream of Foster Park
- Stabilization of the river banks in Foster Park to restore banks damaged in 1998 storms, by Ventura County General Services. Construction will begin in 2004.
- Operation of the Robles Diversion Dam Fish Passage Facility (upstream of Foster Park) will involve minimum by-pass flows during certain hydrologic conditions to facilitate steelhead up and downstream migration below the dam. Operation will begin in 2004.

The following cumulative impacts could occur due to the combination of impacts from the proposed Project, and the projects listed above:

1. Increased water production from upstream pumpers could reduce the City's ability to meet peak production goals. This effect could cause the City to expand the period of time for higher well production. No significant impact is anticipated, because the City's higher production rates would be limited by the river monitoring program designed to protect groundwater levels, aquatic habitat, and riparian vegetation.
2. It is not known if construction work at Foster Park for the proposed Project would coincide with any of the construction projects noted above. If there was an overlap, there is a potential for cumulative impacts related to construction traffic, noise, and air quality.

These impacts are not expected to be significant, as construction work would be temporary, localized, and mostly occurring in separate portions of the park.

3. Operation of the Robles Diversion Dam Fish Passage Facility may affect the pumping regime of new or modified wells at Foster Park if the biological monitoring program under Mitigation Measure BIO-6 indicates that the increased peak pumping regime could adversely affect fish passage flows derived from the upstream facility. At this time, it appears that these flows would not reach Foster Park due to the intervening distance between the dam and Foster Park and the high percolation rates in the river along this reach. No significant impact is anticipated because the biological monitoring program is designed to adjust pumping rates to avoid any significant impact to steelhead habitat, whether it is supported by the Robles Facility releases or by natural runoff.