

Final

VENTURA WATER SUPPLY PROJECTS

Environmental Impact Report
Addendum
SCH No. 2017111004

Prepared for
Ventura Water
501 Poli Street, Room 120
Ventura, CA 93002-0099

September 2022



Final

VENTURA WATER SUPPLY PROJECTS

Environmental Impact Report
Addendum
SCH No. 2017111004

Prepared for
Ventura Water
501 Poli Street, Room 120
Ventura, CA 93002-0099

September 2022

770 Paseo Camarillo
Suite 310
Camarillo, CA 93010
805.914.1500
esassoc.com



Bend	Orlando	San Jose
Camarillo	Pasadena	Santa Monica
Delray Beach	Petaluma	Sarasota
Destin	Portland	Seattle
Irvine	Sacramento	Tampa
Los Angeles	San Diego	
Oakland	San Francisco	

OUR COMMITMENT TO SUSTAINABILITY | ESA helps a variety of public and private sector clients plan and prepare for climate change and emerging regulations that limit GHG emissions. ESA is a registered assessor with the California Climate Action Registry, a Climate Leader, and founding reporter for the Climate Registry. ESA is also a corporate member of the U.S. Green Building Council and the Business Council on Climate Change (BC3). Internally, ESA has adopted a Sustainability Vision and Policy Statement and a plan to reduce waste and energy within our operations. This document was produced using recycled paper.

TABLE OF CONTENTS

Ventura Water Supply Projects

	<u>Page</u>
Introduction	1
1.1 Purpose of the Addendum	1
1.2 Regulatory Background.....	1
2.0 Project Overview	2
3.0 Objectives of the Project	4
4.0 Description of Proposed Modifications	4
5.0 Changed Circumstances	20
6.0 Environmental Analysis	20
Summary.....	74

List of Figures

Figure 1 Conveyance Pipeline Alignment	6
Figure 2 Harbor Crossing HDD Site Map.....	7
Figure 3 Harbor Crossing HDD Worksite	8
Figure 4 Conveyance Pipeline Cross-Section Under Harbor	9
Figure 5 Harbor Crossing Pullback HDD Worksite	10
Figure 6 HDD Process for the Conveyance Bundle	12
Figure 7 Ocean Outfall Site Plan	14
Figure 8 Marina Park Ocean Outfall Assembly and Launch Worksite.....	16
Figure 9 Membrane Bioreactor	18
Figure 10 Membrane Bioreactor Staging Areas	19

VENTURA WATER SUPPLY PROJECTS ENVIRONMENTAL IMPACT REPORT

Addendum

Introduction

1.1 Purpose of the Addendum

The City of San Buenaventura (Ventura or City) certified a Final Environmental Impact Report (EIR) for the Ventura Water Supply Projects in 2019. The EIR evaluated the VenturaWaterPure Project (Project), which will divert tertiary-treated effluent currently being discharged into the Santa Clara River Estuary (SCRE) for potable reuse, augmenting the City's water supply and protecting the ecology of the SCRE. Since the certification of the Final EIR, minor modifications to the project have been identified that warrant preparation of an Addendum pursuant to the California Environmental Quality Act (CEQA) Section 15164. The purpose of this Addendum is to describe and evaluate the potential environmental effects associated with proposed modifications to the VenturaWaterPure Project. For a detailed description of the Project's background, purpose and need, and supporting technical analysis, see the Draft and Final EIRs, located on the City's website: <https://www.cityofventura.ca.gov/1685/Library-of-Reports> (collectively, "EIR").

1.2 Regulatory Background

Section 15164(a) of the CEQA Guidelines provides that an addendum to a previously certified EIR for a project is permissible if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred. A subsequent EIR must be prepared if:

- Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

- New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:
 - The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
 - Significant effects previously examined will be substantially more severe than shown in the previous EIR;
 - Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
 - Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

This Addendum relies on the significance criteria established in the CEQA Guidelines and the resource analysis methodology, described in the EIR, to assess the potential impacts related to the project modifications. Each resource section presents a summary and a determination as to whether the project modifications would result in new significant impacts, or a substantial increase in the severity of significant impacts.

In compliance with CEQA Guidelines Section 15150, this Addendum has incorporated by reference the Final EIR certified by City of San Buenaventura in 2019, which includes all technical studies, analyses, and technical reports that were prepared as part of the Draft and Final EIR.

2.0 Project Overview

As of 2019, the City discharged approximately 4.7 million gallons per day (mgd) of tertiary-treated water to the SCRE. The VenturaWaterPure project will divert some or all of this discharge to a new advanced water purification facility (AWPF) for additional treatment and beneficial potable reuse. The Project will be implemented in two phases. The first phase (Phase 1a) will reduce discharges to the SCRE to an average annual rate of 1.9 mgd. The second phase (Phase 1b) will further reduce discharges to the SCRE to an average annual rate of 0-0.5 mgd. The highly treated product water from the AWPf will be injected into local groundwater basins before distribution to the water system (indirect potable reuse [IPR]) and/or distributed directly, through the water distribution system (direct potable reuse [DPR]).

IPR will be implemented through the construction of groundwater wells, pipelines, and pump stations (needed for injection, extraction, and /or conveyance). Extracted groundwater will be conveyed to the Bailey Water Conditioning Facility (WCF) for disinfection and/or to an existing reservoir for distribution. Alternatively, the extracted groundwater would be disinfected at the point of extraction and conveyed to a nearby water distribution system pipeline. Concentrate waste from the AWPf, along with some tertiary treated flows that exceed AWPf capacity during

wet weather events or times of maintenance or emergency shut-down, will be discharged through a new ocean outfall.

The main components of the VenturaWaterPure Project are summarized below:

Advanced Water Purification Facility: The AWPf will be constructed on the corner of Harbor Boulevard and Olivas Park Drive on an undeveloped parcel within an unincorporated area of Ventura County. This was one of the site options that was analyzed in the EIR. The AWPf will be designed to treat water to potable quality, exceeding California Code of Regulations Title 22 recycled water compliance criteria.

Water Conveyance System: The Project includes several miles of pipelines to convey source water, product water, and waste water. New pump stations will be constructed at the AWPf, Ventura Water Reclamation Facility (VWRF), and groundwater well sites, to connect the project components. As discussed further below, the water conveyance system route has changed since the EIR to reduce the length of the onshore route and to include a pipeline under the Arundell Barranca channel of the Ventura Harbor to Marina Park. This revised route allows for the co-location of two 8-inch sewer pipes that will replace an existing aging 12-inch cast iron pipeline.

Ventura Wastewater Reclamation Facility Treatment Upgrades: The Project includes additional nitrogen treatment processes constructed to meet discharge water quality objectives for the SCRE. Since the EIR was certified, Membrane Bioreactor Treatment has been selected for the treatment upgrade. This process combines the conventional biological treatment processes of removing nitrogen with membrane filtration to provide an advanced level of organic and suspended solids removal. The upgrade will provide an advanced level of nutrient removal. The treatment upgrades will be constructed on the existing VWRF property and may include the addition of aeration blowers, primary treatment improvements, filter replacements and other system upgrades. New pump stations will be constructed at the VWRF to deliver tertiary treated water to the AWPf, and to the ocean outfall if needed as described above.

Groundwater Wells: Up to six wells at three prospective sites will be installed within the Oxnard Plain Basin. Each well will have capacity to inject/extract between 1,250 – 2,750 gallons per minute (depending on the site) into and out of the Oxnard Plain Groundwater Basin. The wells will be constructed in the Oxnard Aquifer to a depth of approximately 250 feet.

Concentrate Discharge Facility: A new ocean outfall will be installed to discharge reverse-osmosis concentrate waste from the AWPf treatment process, along with some tertiary treated flows that exceed AWPf capacity as noted above. The new outfall will be located just north of the Ventura Harbor. A diffuser will be installed at the end of the outfall with discharge portals designed to maximize efficient dilution. The only change discussed in this Addendum is a 800-foot extension of the ocean outfall.

Construction of the entire VenturaWaterPure Project will be phased, and will take approximately 3 to 5 years total, with a tentative start date of 2024. Under the Project, the City will continue to discharge a portion of the VWRF tertiary-treated wastewater to the SCRE during closed berm conditions at the mouth of the estuary.

3.0 Objectives of the Project

The proposed modifications maintain the same objectives as listed within the EIR for the Ventura Water Pure Ocean Outfall project, and are provided below:

- Protect, maintain, and improve ecological resources and related beneficial uses of the SCRE and its watershed.
- Augment local water supply in an environmentally responsible and cost-efficient manner.
- Provide a drought- and disaster-resilient water supply.
- Improve municipal supply groundwater quality within the service area.
- Maintain compliance with the City of Ventura's VWRf NPDES permit.
- Replace the tertiary treatment process at VWRf and make the necessary treatment improvements needed to increase nutrient removal.

4.0 Description of Proposed Modifications

Following the certification of the Final EIR and approval of the Project by the City of Ventura City Council in 2019, detailed designs have been initiated for each component of the Project. The City has recently completed a 60 percent design of the ocean outfall, and has initiated preliminary design work on the AWPf and VWRf upgrades. As these designs have advanced, modifications have been proposed that are described in more detail below.

4.1 Concentrate Conveyance

The Project evaluated in the Draft EIR included installation a 20-inch diameter concentrate conveyance pipeline alignment following Harbor Boulevard to Peninsula Street and Pierpont Boulevard to Marina Park. Subsequent designs have recommended a shortened alignment, modifying the route from Harbor Boulevard to Schooner Drive to Anchors Way, and then under the Arundell Barranca channel of the Ventura Harbor to Marina Park as shown on **Figure 1 and Figure 2**. The segment under the harbor will be installed using horizontal directional drilling (HDD) methods.

The harbor crossing will consist of a 36-inch HPDE sleeve that includes the 18-inch diameter conveyance pipeline as well as two 8-inch diameter sanitary sewer force main pipelines. These two sewer pipelines are being included by the City to replace an existing, aging 12-inch diameter cast iron sanitary sewer force main pipeline which crosses the harbor and eventually could create a water quality risk. The conveyance pipeline and the two sewer pipelines will be bundled together inside a 36-inch diameter HDPE casing, and the entire bundle will be pulled through the HDD bore under the harbor. Currently the 12-inch sewer force main pipeline originates at the existing lift station located at the entrance to Marina Park (Figure 3). From the lift station the sewer pipeline travels south through the parking lot and under the harbor to the Ventura Port District parking lot. From the parking lot, the pipeline continues in a southeast direction within

Anchors Way, turns east just south of Navigator Road to Harbor Boulevard, where it travels south to Spinnaker Road, and heads southwest to the entrance at the VWRP. Once the existing 12-inch pipeline is removed from service and the two replacement sewer pipelines and conveyance pipeline within the 36-inch HDPE are put into service, the existing 12-inch pipeline will be filled with concrete slurry and will be abandoned in place. No further construction will be required to abandon the 12-inch pipeline.

Figure 4 illustrates the HDD drilling route approximately 30 feet beneath the harbor floor. A drilling pit will be constructed within the Ventura Port District parking lot, and the receiving pit will be located within Marina Park. The pits will be excavated to approximately 10 feet deep and would be approximately 15 –feet by 5-feet. The pits will allow the pipe to be pulled underground from the drill pit within the Ventura Port District parking lot under the harbor to the Marina Park receiving pit. The pipes will be installed within a property on the east side of the harbor channel currently used as boat storage (**Figure 5**). Drilling spoils will be stored on site and used to backfill the pits to preconstruction condition. Any excess drilling spoils, not needed to backfill the pits, will be removed from the site and disposed of in accordance with local regulations.

This alignment modification will utilize the construction methods evaluated in the EIR for installation of the HDD portion of the ocean outfall. The modification will shorten the overall length of the concentrate conveyance pipeline by approximately 4,700 feet and avoid temporary street closures and temporary construction noise impacts within the residential neighborhood along Peninsula Street and Pierpont Boulevard. The modified conveyance alignment will pass through an existing boat yard, in front of a hotel (Harbortown Point Marina Resort and Club), adjacent to the Ventura Marina Mobile Home Park along Anchors Way, and the Ventura Port District parking lot and offices. The construction activities will be coordinated with the Ventura Port District and tenants as well as with local residential areas.

On average, 100–200 feet of the conveyance pipeline will be installed per day. Construction will involve trenching using a conventional cut-and-cover technique. The trenching technique includes saw cutting of the pavement where applicable, trench excavation, pipe installation, backfill operations, and resurfacing to the original condition. Open trenches will be approximately 4 to 6 feet wide and 6 to 8 feet deep. Excavation depths will vary depending on location of existing utilities. The pipeline will be installed primarily within existing roadway rights-of-way to the extent feasible. Construction staging areas will be adjacent to the alignment and within property used for boat storage (see Figure 2). Trenches will either be backfilled at the end of each work day or temporarily closed by covering with steel trench plates.

Trenching along Anchors Way to Schooner Road to Harbor Boulevard, terminating in Harbor Boulevard just east of the VWRP, is scheduled to occur during the winter of 2024 after the installation of the Harbor Crossing HDD and will take approximately two to three months.



LEGEND

- Previous Conveyance Pipeline Alignment, Reviewed in the EIR
- - - Outfall Pipeline
- Ventura Water Reclamation Facility
- Conveyance Pipeline Alignment Reviewed in the Addendum



0 Feet 2,000

D:\60685.00 - Ventura Water Pure Advanced Treatment\05 Graphics-GIS-Modeling\Illustrator

SOURCE: HDR

Ventura Water Pure Addendum

Figure 1
Conveyance Pipeline Alignment





SOURCE: HDR

Ventura Water Pure Addendum

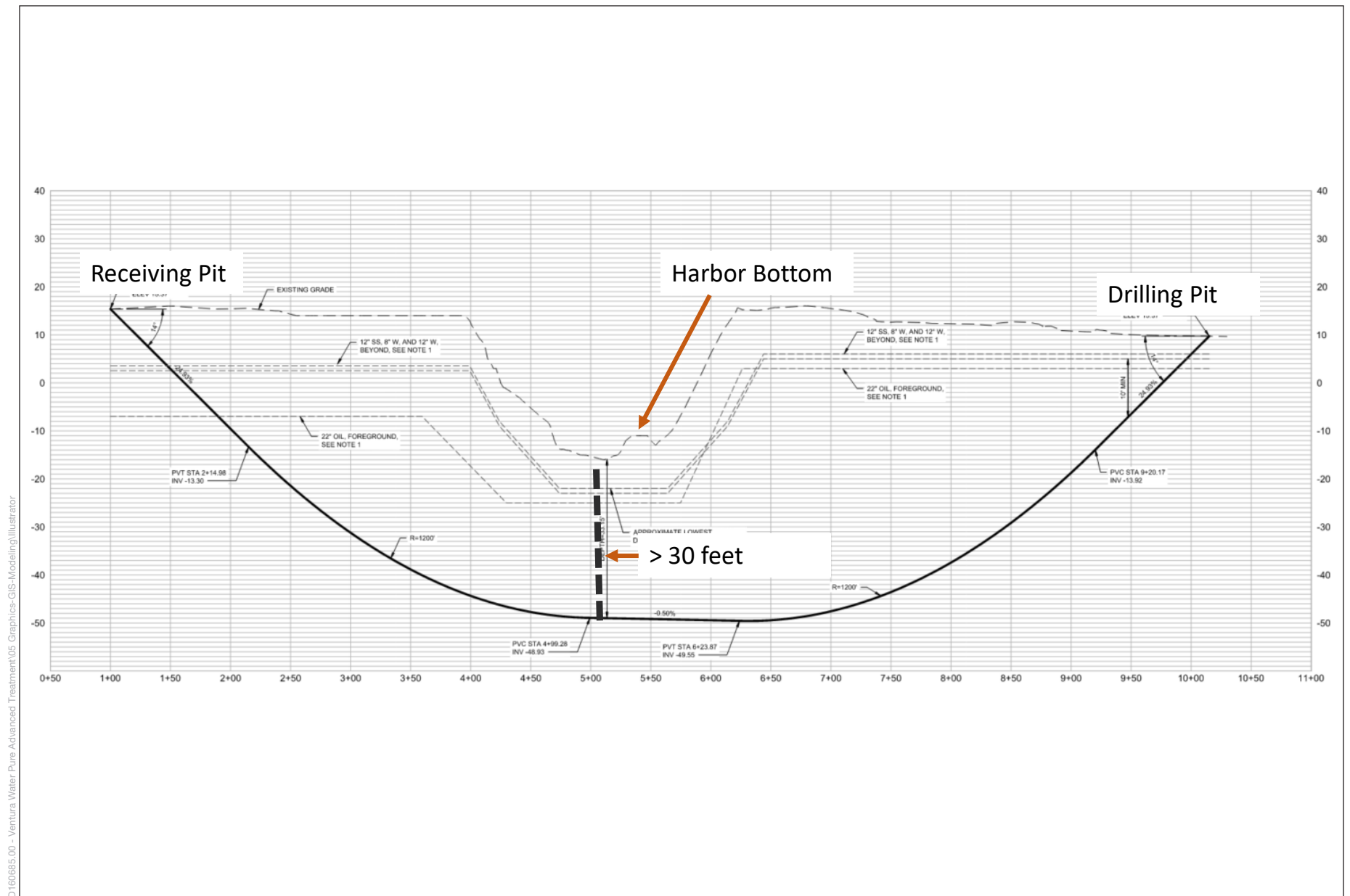
Figure 2
Harbor Crossing HDD Site Map



SOURCE: HDR

Ventura Water Pure Addendum

Figure 3
Harbor Crossing HDD Worksite



SOURCE: HDR

Ventura Water Pure Addendum

Figure 4
Conveyance Pipeline Cross-Section under Harbor



SOURCE: HDR

Ventura Water Pure Addendum

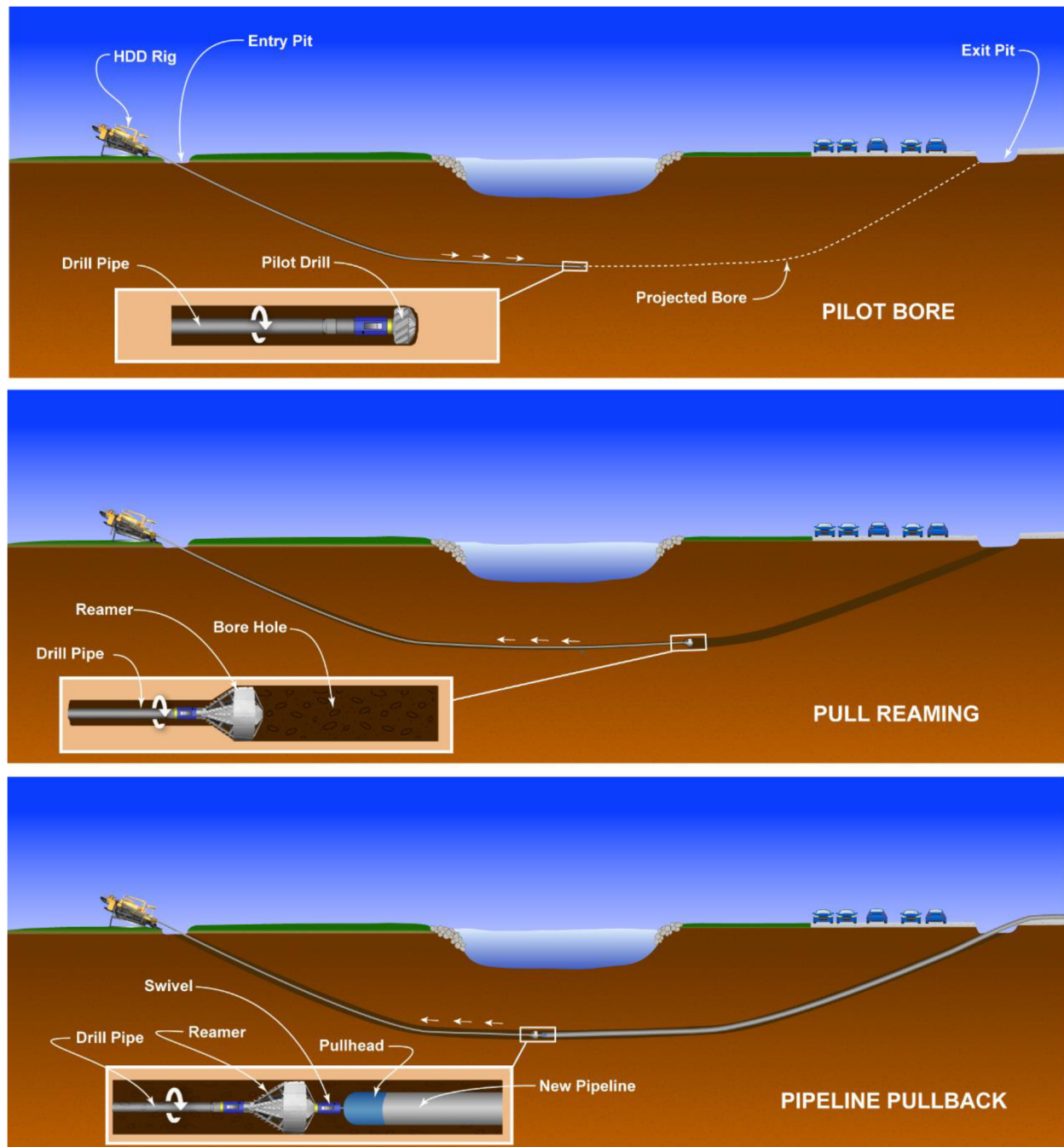
Figure 5
Harbor Crossing HDD Pullback Worksite

As mentioned above, the segment under the harbor will be installed using HDD methods. A drilling rig will be staged within Marina Park in the same worksite as the receiving pit being used for the outfall construction described in the EIR (see p. 2-48). The pilot bore will be installed from the drill rig in Marina Park to a property on the east side of the harbor channel currently used as boat storage. The depth of the pipeline will be approximately 30 feet below the harbor floor. After the initial pilot bore, forward-reaming techniques will be used to open the hole to a suitable diameter to accept the new pipeline. Once the hole has been enlarged and drilling fluid removed, the drill will be advanced. The drill string will be assembled in the staging area within Marina Park. The existing staging area is used for boat storage; these boats would be removed and stored in a lot on E. Harbor Boulevard and Schooner Drive.

The 36-inch HPDE sleeve, including the 18-inch diameter conveyance pipeline and the two 8-inch diameter sewer pipelines, will arrive from the factory by truck in 50-foot-long segments. These 50-foot segments will be staged in the boat yard northeast of Anchors Way, which will have temporary fencing installed for the duration of project activities within the boat yard. The 50-foot-long segments will be fused together end to end to form four pipe strings (two 8-inch diameter pipe strings, one 18-inch diameter pipe string and one 36-inch diameter pipe string), each of which will be approximately 1,300-feet long. These strings will be assembled and staged on rollers within the northern, westbound lane of Anchors Way from the boat yard extending approximately 1,500 feet to the east. A swivel will connect the pull section to a reamer and the drilling rig will pull the drill string with the attached pipeline bundle through the HDD bore until the end of the pipeline bundle reaches the bore entry pit in Marina Park (**Figure 6**). The onshore work will require approximately 15 to 30 workers, working 10-12 hour shifts during pipe bundle assembly and 24-hour operation for approximately 2 days during pullback.

During HDD construction, one-way traffic is proposed on Anchors Way Drive, to allow the pipeline casing and pipelines to be assembled in the other traffic lane. Vehicles will be routed from Schooner Drive to Beachmont Street. Port District offices will be accessed from Beachmont Street. Additionally, Anchors Way Drive will be temporarily closed in both directions for approximately two days during the pulling of the pipeline casing and pipelines. Access to the Port District will still be available from Beachmont Street during that time. However, access will not be available to the boat storage yard adjacent to the Port District Building during this two-day period of HDD construction, or during the period that the sewer force mains are connected as described below. Access to Ventura Marina Mobile Home Park Community will not be impacted during the HDD operations.

There will be two periods of time in which there will be no access to the boat storage driveway. The first will be the two-day period described above. The second will be when the sewer force main pipelines are connected to the existing force main in Anchors Way Drive. This time period could be up to one week with closures during the day only. Tenants will be notified in advance of the closures to ensure that they will know that they should access their boats prior to the closures or (in the case of the second closure) at night.



Ventura Water Pure Addendum

Figure 6
HDD Process for the Conveyance Bundle

The Harbor crossing HDD is scheduled to occur before the outfall HDD in the winter of 2023 and early spring of 2024. The typical schedule for onshore work is 10 hours per day, 6 days per week (Monday through Saturday). Since most of the pipe preparation and pit construction will occur during Daylight Saving time of the year, it will be conducted during daylight hours. To minimize the noise impact to residents and businesses, the workday will generally run from 7:00 a.m. to 5:00 p.m. in compliance with the City noise ordinance. However, the HDD operations may require short periods of 24-hour construction, over a consecutive period of approximately 2-3 days. This is necessary because once the pipe pullback begins, the operation must be continuous until it is complete in order to avoid a potential collapse in the pilot bored hole. Lighting in and around the onshore worksites will be configured to minimize halo and spillover impacts on residents, marine mammals, and birds through the use of diffusers and shielding.

4.2 Ocean Outfall Design Updates

The EIR described on page 2-35 that the new ocean outfall pipeline would be installed using HDD technologies emerging on the ocean floor approximately 2,000 – 4,000 feet from the shoreline, with an additional 2,000 feet of pipeline and diffuser on the ocean floor to reach a depth of 50 feet below mean sea level. Subsequent designs recommend that the ocean outfall emerge on the ocean floor approximately 4,500 feet from the Marina Park with an ocean floor segment extending an additional 2,083 feet, followed by a 208-linear foot diffuser at a depth of 53 feet below mean sea level. This extends the outfall approximately 800 feet further from shore than identified in the EIR; however, well within the study area analyzed in the EIR. This modification will occur entirely within the study area for the outfall installation, within an area of the ocean floor that is similar to the rest of the installation area described in the EIR. Construction methods will not change.

On the onshore side, no permanent structures will be placed aboveground other than at-grade hatches to underground vaults within Marina Park. These hatches will be approximately 10-feet by 20-feet and at grade level (see Figure 3).

In addition, the EIR assumed a discharge capacity of 6.9 mgd and the refined design recommends a discharge capacity of 14.8 mgd. This additional capacity is being provided to accommodate the infrequent occasions when tertiary flows are not allowed to be discharged to the SCRE. The use of the ocean outfall for occasional tertiary flows is included in the EIR and is not a modification to the project, only the pipe diameter has been modified based on updated hydraulic modeling.

Figure 7 illustrates the currently proposed ocean outfall segments and ocean construction area.

The diffuser will be built onshore, over a period of approximately 20 days, within an approximately 2-acre lot within Harbor Cove Beach, located at the end of Spinnaker Drive (Figure 7). The work area will be in an upland portion of the beach used as a storage and staging area for the annual dredging operation for the harbor. This area is unpaved and used for storage; it is not used as a beach. The site is owned by the Port District. As a public-serving utility, the use of the site is consistent with the land use designation (Commerce) and zoning (Harbor Commercial). No permanent structure would be built on the site.



D:\60685.00 - Ventura Water Pure Advanced Treatment\05 Graphics-GIS-Modeling\Illustrator

SOURCE: HDR

Ventura Water Pure Addendum

Figure 7
Ocean Outfall Site Plan

Since this section of the outfall is more complicated than the other pipeline portions, requiring weights and risers on the pipe, it would be difficult to launch it from Marina Park without major construction to access the water. Since the diffuser section is only about two hundred feet in length, it can be fully assembled ahead of time, then pulled into the harbor via the beach and towed out to the Offshore Worksite. The Harbor Cove Beach site has been subject to prior disturbance associated with the Ventura Harbor Federal Maintenance Dredging Program conducted by USACE. Historically, Ventura Harbor has been dredged by USACE on an annual basis since 1969. The most recent Federal maintenance annual dredging in Ventura Harbor was completed in March 2022. The unpaved area is completely disturbed by prior staging activities (storage of vehicles, equipment and materials, as well as ingress/egress).

Onshore construction at this site will occur over 20 days. Once assembled, the Diffuser Segment will be pulled into the harbor via the beach and towed to the Offshore Worksite with minimal disruption to non-project vessel traffic. Launch and towing of the Diffuser Segment will be completed in one day and may involve restrictions to harbor entry and egress under the Port District's authority during the period when the pipeline segments are floated out to the ocean. After the launch operation is complete, Harbor Cove Beach will be returned to a storage area for the Port District.

The offshore work will require approximately 10 to 25 workers, working 10-12 hour shifts. Weather will be the primary schedule driver for the offshore work. The offshore work for the HDD segment is scheduled for late spring 2024, and the offshore work is scheduled for late spring through summer 2024. The typical schedule for offshore work is 12 hours per day, 7 days per week. Since most of the work will occur during Daylight Saving time of the year, it will be conducted during daylight hours. The workday will generally run from 6:00am to 6:00pm.

4.3 Ocean Outfall Pipe Assembly Process

As stated in the EIR, the ocean outfall will be assembled within Marina Park, prior to being installed on the ocean floor. The HDD segment of the outfall pipeline will be assembled by fusing approximately 600-foot long pipe strings within Marina Park.

The HDPE pipeline will arrive from the factory by truck in 50-foot-long segments. A dedicated HDPE fusion machine will fuse these 50-foot segments together end-to-end to form intermediate-length strings approximately 600 feet long. The HDPE fusion machine holds the HDPE pipe stationary and trims the ends of both sections of pipe, and then the two pipe ends are heated by the machine, pressed together, and held in place while the newly formed joint cools. Once the joint has cooled, excess HDPE around the joint that was melted and then cooled is trimmed and are disposed of.

When the HDD segment is ready to be launched, the strings will be fused together to form the 4,500-foot-long pipeline. As the pipeline is assembled it will be placed on wheeled dollies, which will allow the pipe string to be pulled into Ventura Harbor by a tugboat or similar vessel without disturbing the ground. This will necessitate the closing of the Harbor mouth for approximately one day while the pipes are towed out to sea to recreational users. Harbor patrol will have access at all times. This will necessitate close coordination with the Port District and other harbor users.

(Figure 8)



SOURCE: HDR

Ventura Water Pure Addendum

Figure 8
Marina Park Ocean Outfall Assembly and Launch Worksite

The HDD segment's pull head will be attached to the HDD drill string with a swivel on the deck of a support vessel, and the HDD segment will then be pulled into the HDD bore by the drilling rig located onshore. The HDD segment will be pulled back through the HDD bore by the HDD rig located in Marina Park until the flanged offshore end of the HDD segment is within 10 to 25 feet of the HDD exit point on the seafloor, at which point the pullback operation will cease.

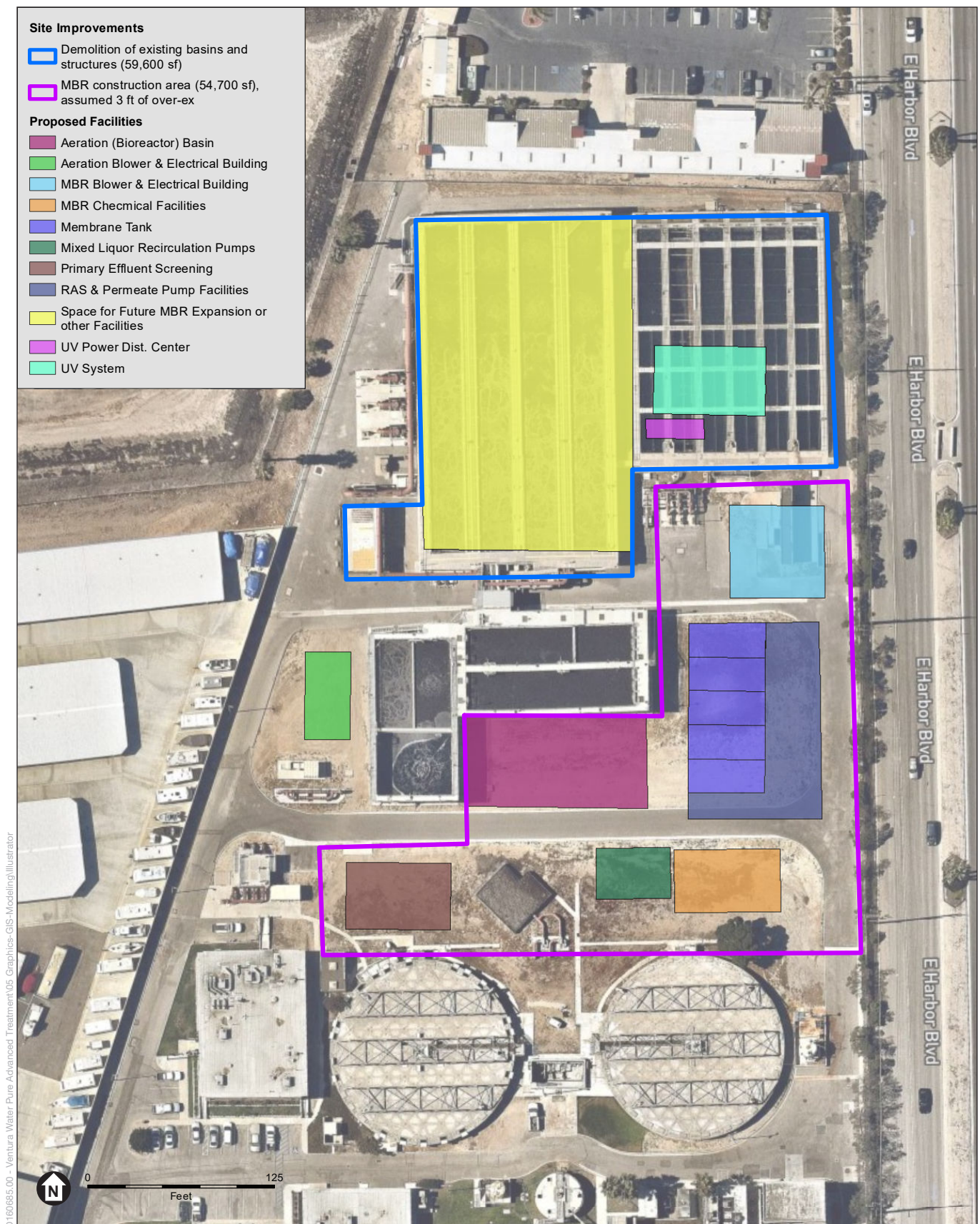
Onshore, at the Marina Park site, the casing will be cut off below grade to facilitate connection to the below grade segment of the conveyance pipeline. Once the HDD segment is in place, the drilling equipment will be demobilized from Marina Park, the onshore bore pit in Marina Park will be backfilled with the material stock piled on site from the drilling operations, and the site will be restored to preconstruction conditions. Any excess drilling spoils, not needed to backfill the pits, will be removed from the site and disposed of in accordance with local regulations.

The HDD work in Marina Park will be conducted in the winter 2023 and spring 2024. HDD work in Marina Park will be completed prior to Memorial Day (May 27, 2024). The typical schedule for onshore work is 10 hours per day, 6 days per week (Monday through Saturday). To minimize the noise impact to residents and businesses, the workday will generally run from 7:00am to 5:00pm. However, similar to the EIR, the HDD operations may require 24-hour construction once the pipe pullback begins, because during pullback the operation must be continuous until it is complete in order to avoid a potential collapse in the pilot bored hole.

4.4 Membrane Bioreactor Treatment Process

The EIR identified the need to upgrade treatment facilities at the VWRP and/or create treatment wetlands to reduce nitrogen concentrations within the tertiary-treated effluent. As VWRP treatment upgrades have been evaluated, the City has proposed to install a new Membrane Bioreactor system to replace the existing secondary and tertiary components of the VWRP. This Membrane Bioreactor process will assist in enhancing nutrient removal in the tertiary-treated effluent, and will provide more consistent and controllable nutrient removals than natural treatment wetlands can provide. Components of this modification to the project are described further below. **Figure 9** identifies the locations of the new Membrane Bioreactor facilities within the existing VWRP footprint and **Figure 10** shows the construction staging area.

A new fine-screen facility will be installed downstream of the primary equalization basin pump station, to protect the downstream Membrane Bioreactor process and to meet membrane warranty requirements. New aeration tanks will be installed, replacing the existing VWRP aeration basins (ABs), secondary clarifiers (SCs), and pressure filters. These older VWRP structures, with a cumulative footprint of approximately 59,600 square-feet (sf), will be demolished as part of the construction process. The proposed aeration tanks will be smaller than the existing ABs, achieving the same treatment with a reduced footprint (approximately 54,700 sf). Mixed liquor from the aeration tanks will then be directed to the membrane tanks. High quality tertiary effluent will be produced by micro- and ultra-filtration membranes. A UV disinfection system will replace the chlorine disinfection tanks.



SOURCE: ESA, 2022

Ventura Water Pure Addendum

Figure 9
Membrane Bioreactor



SOURCE: ESA, 2022

Ventura Water Pure Addendum

Figure 10
Membrane Bioreactor Staging Area

Once the Membrane Bioreactor system is operational, the existing ABs and SCs will be demolished. On the southern portion of the property, there will be two staging areas for contractor's equipment and materials. The staging areas will equal approximately 142,400 sf.

The work will require approximately 10 to 30 workers, working 10-14 hour shifts Monday to Saturday. Construction is anticipated to begin in the third quarter of 2024 and end in the third quarter of 2026.

5.0 Changed Circumstances

CEQA Checklist Modifications

The certified 2019 EIR prepared for the project included analyses consistent with the checklist contained in Appendix G of the 2015 version of the CEQA Guidelines. The CEQA Guidelines Appendix G checklist was subsequently updated in 2019, and now includes new and/or revised thresholds, as well as additional environmental topics to be assessed. These topics are included in the checklist summary in Section 6.0, Environmental Analysis, of this Addendum.

6.0 Environmental Analysis

Aesthetics

<i>Issues (and Supporting Information Sources):</i>	<i>Yes</i>	<i>No</i>
I. AESTHETICS — Would the modifications, changed circumstances, or new information result in new significant impacts or substantially increase the severity of previously identified significant impacts that would:		
a) Have a substantial adverse effect on a scenic vista?	☐	☒
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☒
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☒
d) Create a new source of substantial light or glare which would adversely affect daytime or nighttime views in the area?	☐	☒

Discussion

a, b, c) Scenic Vistas, Resources Within a State Scenic Highway, Scenic Quality

Concentrate Conveyance

The new conveyance alignment will introduce construction activities to new locations within the harbor. A portion of the modified conveyance alignment will pass through a boat yard, in front of a hotel (Harbortown Point Marina Resort and Club), and near a residential neighborhood. Construction equipment and materials will be visible along Harbor Boulevard, Schooner Drive, and Anchors Way. As shown in Figure 2, the boat

yard adjacent to Anchor Way will be used as a temporary staging area for the conveyance pipeline, and HDD drilling will take place in the area.

The EIR evaluated temporary aesthetic impacts from HDD construction methods in Marina Park and within city streets. The receiving pit within Marina Park will be located in the same worksite as the outfall HDD construction worksite. The new HDD pit in the parking lot will use the same HDD construction techniques as described in the Project Description of the EIR. **Mitigation Measures AES-1 and AES-2** will ensure that screening will be installed to minimize impacts to public views. The construction activities will be short-term and will not result in any new significant impacts. This finding is consistent with the impact determination in the EIR; no new significant impacts would occur, and no new mitigation measures are required.

Once constructed, impact areas will be returned to pre-project conditions and will not have a substantial adverse effect on scenic vistas, views, or character. The pipeline will be underground. This finding is consistent with the impact determination in the EIR; no new significant impacts would occur, and no new mitigation measures are required.

Ocean Outfall Design Updates

As noted in the EIR, the California Scenic Highway System Map shows that there are no officially Designated State Scenic Highways within the project area. Highway 101 and the northern portion of Harbor Boulevard within the project area are considered Eligible State Scenic Highways. However, there are currently no designated Scenic Resource Areas within the proposed project area according to the Ventura County General Plan, Resource Protection Map.

The proposed ocean outfall design updates including the extension of the ocean outfall by approximately 800 feet will not alter the construction methods analyzed in the EIR. Impacts to ocean views within the coastal zone will be the same as assessed in the EIR (see p. 3.1-27). Barges will be visible from shoreline during the installation. Barges will be lighted at night. This finding is consistent with the impact determination in the EIR; no new significant impacts will occur, and no new mitigation measures are required.

The construction of the diffuser will occur in an upland area of Harbor Cove Beach and will be temporarily visible from the beach. However, the site is currently used as a storage and staging area for the Ventura Harbor Federal Maintenance Dredging Program conducted by USACE. The unpaved area is completely disturbed by prior staging activities (storage of equipment and materials, as well as ingress/egress). The construction at this site will occur over 20 days and once construction has been completed, all equipment would be removed.

Consistent with the analysis in the EIR, once constructed, no above grade structures will be installed that block views, or result in a substantial adverse effect on a scenic vistas or views. Underground vaults within Marina Park will not alter the scenic vistas, views, or character of the park. The two at-grade hatches providing maintenance and inspection access to the underground pipeline junctions to the outfall and will not have a substantial

effect on views. The construction will be consistent with local zoning and regulations concerning scenic character and quality. This finding is consistent with the impact determination in the EIR; no new significant impacts will occur, and no new mitigation measures are required.

Ocean Outfall Pipe Assembly Process

As described in the DEIR (see p. 3.1-18), construction equipment and materials will be visible from public viewing areas and could have potential impacts on ocean views. However, these impacts will not permanently or adversely affect scenic views or vistas within the project area. The modification includes some construction activities in the northern portion of the Marina Park but impacts to viewing areas will be temporary (Figure 3). This finding is consistent with the impact determination in the EIR; no new significant impacts will occur, and no new mitigation measures are required.

Membrane Bioreactor Treatment Process

The proposed project includes constructing a Membrane Bioreactor within the existing VWRf footprint. The Membrane Bioreactor will be contained within the existing facility. Construction methods may require cranes and be visible from neighboring areas, but will not block views or scenic vistas. There are currently no designated Scenic Resource Areas within the proposed project area according to the Ventura County General Plan, Resource Protection Map.

Once constructed, the proposed facilities will be similar in height and character to other structures within the plant. The new facilities will be consistent with local zoning and regulations concerning scenic character and quality. The Membrane Bioreactor will not impact local ocean views and no adverse effects to scenic vistas or views would occur. This finding is consistent with the impact determination in the EIR; no new significant impacts would occur, and no new mitigation measures are required.

d) New Source of Substantial Light or Glare

Concentrate Conveyance

The concentrate conveyance pipeline will be installed within Schooners Way and Anchor Street that traverses the Ventura Harbor and passes by a residential mobile home development. A portion of the modified conveyance alignment will pass through a boat yard that is adjacent to a residential neighborhood and hotel. Trenching within these streets will occur within 25 feet of the closest homes. In addition, open trenching will be used to connect the conveyance pipeline with the ocean outfall within Marina Park. Construction within the park will occur within 25 feet of the backside of the residential neighborhood on Bayshore Avenue. This open trench construction will occur during the day time and will require three to four weeks near any one home. The temporary impacts from open trench pipeline installation will be similar to impacts outlined in the EIR (see p. 3.13-19). Further, lighting will not be required during construction. Once constructed, pipelines will be entirely underground and impact areas will be returned to pre-project

conditions (see p. 3.1-30). This finding is consistent with the impact determination in the EIR; no new significant impacts will occur, and no new mitigation measures are required.

To cross the harbor channel, HDD technologies will be employed. A drilling pit and a receiving pit will be excavated to accommodate the HDD drill bore. HDD activities will require 24-hour drilling. Temporary overhead nighttime lighting may be installed during this period within the boat storage yard and within Marina Park. There is potential for the overnight lighting to spill into neighboring residential or public roadways. As described in Mitigation Measure AES-3 of the EIR, lighting in and around the worksites will be configured to minimize halo and spillover. In addition, sound walls will be installed around the drilling pits to minimize noise and light impacts to neighboring land uses. Implementation of Mitigation Measure AES-3 from the EIR will minimize impacts to neighboring land uses from nighttime lighting.

Once constructed, the pipelines will be entirely underground and impact areas would be returned to pre-project conditions. No lighting will be required during operation and no impact would occur. This finding is consistent with the impact determination in the EIR; no new significant impacts will occur, and no new mitigation measures are required.

Ocean Outfall Design Updates

Construction methods in the ocean and Marina Park will not be altered by the proposed modifications. The typical schedule for offshore work is 12 hours per day, 7 days per week. Most of the work will occur during day light hours, but nighttime work may be authorized. Lighting on offshore vessels will be configured to minimize halo and spillover impacts on residents, marine mammals, and birds through the use of diffusers and shielding.

Implementation of Mitigation Measure AES-3 from the EIR will ensure that impacts associated with light and glare are reduced to a less than significant level, by requiring nighttime construction lighting to be shielded and pointed away from surrounding light-sensitive land uses. Once construction is completed, the pipeline will be underground, and no light would be required for operations. This finding is consistent with the impact determination in the EIR; no new significant impacts will occur, and no new mitigation measures are required.

Ocean Outfall Pipe Assembly Process

Construction methods in the ocean and Marina Park would not be altered by the proposed modifications. The typical schedule for offshore work is 12 hours per day, 7 days per week. Most of the work would occur during day light hours, but nighttime work may be authorized. Implementation of Mitigation Measure AES-3 from the EIR will ensure that impacts associated with light and glare are reduced to a less than significant level, by requiring nighttime construction lighting to be shielded and pointed away from surrounding light-sensitive land uses. This finding is consistent with the impact determination in the EIR; no new significant impacts would occur, and no new mitigation measures are required.

Membrane Bioreactor Treatment Process

The proposed Membrane Bioreactor will be constructed entirely within the existing plant footprint. During operation, no additional lighting will be required beyond what is currently at the existing facility. Construction may require 24-hour activities that require nighttime lighting. The VWRF site is not located within 1,000 feet of any residential development. The temporary lighting required for construction would be shielded and positioned to only illuminate the worksite within the VWRF and will not spill off of the property. Impacts from temporary nighttime lighting during construction will not result in adverse effects. This finding is consistent with the impact determination in the EIR; no new significant impacts will occur, and no new mitigation measures are required.

Summary of Potential Effects on Aesthetics

The proposed modifications will not result in substantial changes to scenic resources, will not cause new significant environmental effects, and will not result in a substantial increase in the severity of previously identified significant effects. In addition, there are no changes in circumstances under which the project is undertaken, or new information of substantial importance with respect to aesthetics that would potentially result in a significant new effect.

References

California Department of Transportation (Caltrans), 2022. California State Scenic Highway System Map. Available at:
<https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca>, accessed May 3, 2022.

Agriculture and Forestry Resources

<i>Issues (and Supporting Information Sources):</i>	<i>Yes</i>	<i>No</i>
II. AGRICULTURE AND FORESTRY RESOURCES — Would the modifications, changed circumstances, or new information result in new significant impacts or substantially increase the severity of previously identified significant impacts that would::		
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☒

Discussion

a, b, c, d, e) Agricultural and Forestry Resources

Concentrate Conveyance

The concentrate conveyance alignment will occur within urban and built-up land. No Prime Farmland, Unique Farmland, or Farmland of Statewide Importance will be converted to non-agricultural use. No forest lands will be affected. The modification does not alter the impact analysis within the EIR. This finding is consistent with the impact determination in the EIR; no new significant impacts will occur, and no new mitigation measures are required.

Ocean Outfall Design Updates

The ocean outfall will be extended an additional 800 feet into the ocean. No agricultural lands or forest lands will be affected. No Williamson Act lands, other farmlands, or forest will be converted to non-agriculture or forest use. This finding is consistent with the impact determination in the EIR; no new significant impacts will occur, and no new mitigation measures are required.

Ocean Outfall Pipe Assembly Process

The pipeline assembly area will be within Marina Park. No agricultural lands or forest lands will be affected. No farmland or forest will be converted to non-agriculture or forest use. This finding is consistent with the impact determination in the EIR; no new significant impacts will occur, and no new mitigation measures are required.

Membrane Bioreactor Treatment Process

The construction of the Membrane Bioreactor would take place entirely within the existing VWRP. No Prime Farmland, Unique Farmland, or Farmland of Statewide Importance would be converted to non-agricultural use. No forest lands would be affected. This finding is consistent with the impact determination in the EIR; no new significant impacts would occur, and no new mitigation measures are required.

Summary of Potential Effects on Agricultural and Forestry Resources

The proposed modifications will not result in substantial changes to agricultural and forestry resources, cause new significant environmental effects, or result in a substantial increase in the severity of previously identified significant effects. In addition, there are no changes in circumstances under which the project is undertaken, or new information of substantial importance with respect to agricultural and forestry resources that will potentially result in a significant new effect.

References

California Department of Conservation (DOC), 2022. California Important Farmland Finder. Accessed at: <https://maps.conservation.ca.gov/DLRP/CIFF/>. Retrieved on March 12, 2022.

Air Quality

<i>Issues (and Supporting Information Sources):</i>	<i>Yes</i>	<i>No</i>
III. AIR QUALITY —		
Would the modifications, changed circumstances, or new information result in new significant impacts or substantially increase the severity of previously identified significant impacts that would::		
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☒
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☒
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☒
d) Expose sensitive receptors to substantial pollutant concentrations?	☐	☒
e) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☒

Discussion

a, Conflict with or obstruct implementation of the applicable air quality plan?

All Components

As stated in the Ventura County Air Quality Assessment Guidelines, project consistency with the applicable Air Quality Management Plan (AQMP) can be determined by utilizing the following methods:

1. Comparing the actual population growth in the county with the projected growth rates used in the AQMP. The projected growth rate in population is used as an indicator of future emissions from population-related emission categories in the AQMP. These emission estimates are used, in part, to project the date by which Ventura County will attain the federal ozone standard. Therefore, a demonstration of consistency with the population forecasts used in the most recently adopted AQMP should be used for assessing project consistency with the AQMP.
2. A project with estimated emissions 2 pounds per day or greater of reactive organic compounds (ROC), or 2 pounds per day or greater of nitrogen oxides (NOx) that is inconsistent with the AQMP will have a significant cumulative adverse air quality impact.

The proposed modifications will not change the water supply objectives or capacity of the Project and will continue to be consistent with the Urban Water Management Plan (UWMP) and SCAG growth projections for the region. Emissions associated with this level population level and water demands are considered within the AQMP. Therefore, for these reasons, the proposed modifications will not change the conclusions of the EIR and will not conflict with or obstruct implementation of the applicable AQMP.

- b) **Violate any air quality standard or contribute substantially to an existing or projected air quality violation**

Concentrate Conveyance

Installation of the conveyance pipeline will involve trench excavation, pipe installation, backfill operations, and re-surfacing to the original condition. The proposed modifications will shorten the linear extent and duration of open trench construction compared with the original project. Therefore, emissions from the modified project will be less than the original project for trenching methods.

Construction methods will include the addition of HDD methods for installing the pipeline under the harbor. The location of the HDD drilling will continue to be within Marina Park as analyzed in the EIR, and daily emissions from HDD methods will be similar to those estimated in the EIR at that same location. The Final EIR estimated construction emissions spanning a period of four years, including the potential for HDD methods to occur within a two-year period. While HDD drilling for the conveyance pipeline was not specifically addressed, the proposed addition of HDD drilling for the concentrate conveyance pipeline under the harbor will be within this estimated timeframe and will not extend the estimated construction schedule. Therefore, the proposed modification will not increase the severity of construction emissions compared with the analysis in the EIR.

Ocean Outfall Design Updates

The extension of the outfall will not modify the construction methods or extend the construction duration compared to the analysis in the EIR. Therefore, the refinement to the project design will not increase construction emissions, including onshore and offshore vehicle emissions.

Ocean Outfall Pipeline Assembly Process

The assembly of the ocean outfall pipeline will occur within two areas near the harbor: one at the parking area in Marina Park and the other within a previously disturbed area of Harbor Cove Beach. Air emissions associated with the pipeline segment fusing will include heating equipment to fuse the HDPE segments. Use of the fuser machines will use electricity and will not generate combustion emissions. Therefore, the proposed modification will not increase the severity of construction emissions compared with the analysis in the EIR.

Membrane Bioreactor Treatment Process

The addition of the MBR facilities will involve construction activities, including demolition, excavation, foundation building, soil hauling, grading, building construction, and finishing. The construction activities associated with the Membrane Bioreactor are summarized in **Table 1**.

TABLE 1
CONSTRUCTION PHASES AND OFF-ROAD EQUIPMENT NEED ASSUMPTIONS FOR MEMBRANE BIOREACTOR

MBR Construction Phase	Heavy-Duty Equipment	Number of Equipment Needed
Demolition	Tractor/Loader/Backhoes	4
	Excavator	3
	Off-Highway Trucks	1
	Rubber Tired Dozers	3
Site Preparation	Tractor/Loader/Backhoes	2
	Off-Highway Trucks	1
	Rubber Tired Dozers	2
Grading/Excavation	Tractor/Loader/Backhoes	2
	Excavators	1
	Graders	1
	Rubber Tired Dozers	1
	Scrapers	1
Foundations/Concrete Pour	Cement and Mortar Mixers	1
	Concrete/Industrial Saws	1
	Pile Driver (vibratory)	1
	Pumps	2
	Tractors/Loaders/Backhoes	1
Drainage/Utilities/Trenching	Excavators	1
	Forklifts	1
	Rubber Tired Dozers	1
	Skid Steer Loaders	1
	Tractors/Loaders/Backhoes	2
Building Construction	Air Compressors	1
	Cranes	1
	Forklifts	1
	Generator Sets	1
	Rough Terrain Forklifts	1
	Sweepers/Scrubbers	1
	Tractors/Loaders/Backhoes	1
Paving	Dumpers/Tenders	1
	Pavers	1
	Paving Equipment	1
	Rollers	1

The EIR assumed that construction will include site grading and excavation to a depth of 6 feet with a total of approximately 1,350 truck trips would be required to haul off and import materials and for worker-related travel. The modified treatment upgrades would increase these volumes to approximately 1,500 truck trips during demolition and an additional 1,200 during excavation activities. Construction activities would occur within the VWRf site as described in the EIR for VWRf Treatment Upgrades, but they would

involve demolition of existing facilities within a larger area and will involve construction of larger structures. Therefore, more equipment would be needed and construction emissions would be greater than estimated in the EIR for the VWRf Upgrades. The emissions generated on a daily basis would vary, depending on the amount and types of construction activities occurring at the same time. The estimate of regional daily construction emissions has been prepared utilizing the CalEEMod computer model recommended by the VCAPCD.

Table 2 identifies projected emissions resulting from grading and construction activities for the VWRf Upgrades and Membrane Bioreactor. The estimated maximum daily construction emissions associated with the new MBR Treatment Facilities would be greater than those evaluated for the VWRf Upgrades before mitigation. As shown below, construction emissions from the Membrane Bioreactor would exceed 25 pounds per day for NO_x. However, implementation of Mitigation Measures AQ-1 and AQ-2 from the EIR would reduce construction emissions of criteria pollutants to less than significant levels, consistent with VCAPCD rules, and similar to the conclusions in the EIR. (see p. 3.3-24). With the implementation of the mitigation measures, impacts would remain less than significant. Therefore, the proposed modification would not create a new significant impact or substantially increase the severity of construction emissions compared with the analysis in the EIR that would result in a new significant impact.

TABLE 2
SHORT-TERM REGIONAL CONSTRUCTION EMISSIONS FOR THE VWRf TREATMENT UPGRADES

Year	Maximum Daily Pollutant Emissions (lbs/day)					
	ROC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Emissions Estimates for VWRf Upgrades in EIR						
2021	3	30	26	0	4	2
2022	2	16	17	0	1	1
Emissions Estimates for MBR Treatment Facility						
2024	5.8	58.7	48.0	<1	5.7	3.9
2025	2.5	23.4	30.8	<1	1.3	1.0
2026	4.7	18.4	27.1	<1	1.2	0.8

- c) **Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?**

All Components

The construction and operation of the proposed modifications will increase overall air emissions, but would not substantially increase non-attainment pollutants (e.g. O₃ and PM₁₀), of the proposed project as a result of the new Membrane Bioreactor. However, the project will be consistent with the AQMP since it will accommodate public infrastructure needed to support planned growth. Emissions associated with the modifications are within

the expected cumulative emissions forecast in the AQMP. As a result, the project will not contribute significantly to cumulative emissions. The VCAPCD has not adopted quantitative thresholds of significance for construction emissions, since such emissions are temporary. Rather, the VCAPCD recommends implementation of emission and dust control requirements for all construction projects with ROC or NOx emissions over 25 pounds per day. As shown below, construction emissions from the proposed project would exceed 25 pounds per day for NOx. Implementation of Mitigation Measures AQ-1 and AQ-2 would reduce construction emissions of criteria pollutants. Mitigation Measure AQ-1 requires that all graded and excavated material, exposed soil areas, and active portions of the construction site, including unpaved on-site roadways, be treated to prevent fugitive dust and closely monitored and that disturbed areas be minimized as much as possible. Mitigation Measure AQ-2 requires that idling time be minimized and the engines of the construction equipment properly maintained. Thus, cumulative air quality impacts would be less than significant.

d) Expose sensitive receptors to substantial pollutant concentrations

All Components

Intermittent construction activities identified in the EIR will result in short-term emissions of diesel particulate matter, which the state has identified as a toxic air contaminant (TAC). During construction, the exhaust of off-road heavy-duty diesel equipment will emit diesel particulate matter during general construction activities, such as site grading, excavation, trenching, materials transport and handling, and building construction. The proposed modifications will reduce the construction activities associated with the concentrate conveyance pipeline installation, reducing TAC emissions compared to the proposed project. The modified ocean outfall and pipeline assembly will not change emissions compared to the EIR. Construction of the Membrane Bioreactor will require more intensive construction methods than identified in the VWRf Upgrades evaluated in the EIR. However, the closest sensitive receptor to the CWRF is over 1,000 feet to the north. Therefore, the construction activities will not increase exposure of TAC to sensitive receptors. Once constructed, the proposed Membrane Bioreactor will increase emissions compared with the EIR's assessment of the VWRf Upgrades, but will not result in a significant increase in emissions that could affect nearby sensitive receptors. Therefore, the modifications will not result in a new impact or increase the severity of a previously identified impact.

e) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people

All Components

The proposed modifications will not increase the release of odors or other emissions that could affect a substantial number of people compared with the project assessed in the EIR. The construction methods for the extended ocean outfall, Membrane Bioreactor, and concentrate conveyance pipeline will be similar to the methods assessed in the EIR, including trenching, excavation, soil hauling, pipeline assembly and installation, and HDD.

These activities will temporarily generate emissions associated with vehicle exhaust, but will be temporary and variable over the construction period. The pipeline assembly process will include HDPE fusing that will produce odors locally near the activity. Any odors will dissipate with distance affected by ocean breezes and will not be expected to linger in any area for long periods of time. The assembly process will occur over a two-week period at two locations. This construction method is not expected to create odors beyond the immediate vicinity of the fusing machine, it will be temporary and will not result in adversely affecting a substantial number of people. The proposed modifications will not result in odor emissions once constructed. The new Membrane Bioreactor will update the odor control facility at the VWRP. As a result, the proposed modifications will not impose a new impact or increase the severity of a previously identified impact.

Summary of Potential Effects on Air Quality

The proposed modifications will not cause new significant environmental effects, and will not result in a substantial increase in the severity of previously identified significant effects. In addition, there are no changes in circumstances under which the project is undertaken, or new information of substantial importance with respect to air quality that will potentially result in a significant new effect.

Biological Resources

<i>Issues (and Supporting Information Sources):</i>	<i>Yes</i>	<i>No</i>
IV. BIOLOGICAL RESOURCES — Would the modifications, changed circumstances, or new information result in new significant impacts or substantially increase the severity of previously identified significant impacts that would::		
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☒
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☒
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☒
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☒
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☒
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☒

Discussion

a, b, c, d, e, f) Sensitive Species, Habitats, Wetlands, Wildlife Corridors, Ordinances, Habitat Conservation Plans

Concentrate Conveyance

The proposed project will include construction of a conveyance system connecting the AWPf with the outfall for discharge of concentrate. The underground pipelines will be installed in public rights-of-way in areas that are mostly previously disturbed areas or within the roadway itself. The conveyance system will also be located under the Arundell Barranca in an HDPE conduit that also includes two replacement sewer lines.

The pipeline alignment will be constructed adjacent to existing residential, a hotel parking lot, restaurant parking lot, boat storage yards and the Marina parking lot. The pipeline alignment will be located within disturbed urban areas that are not suitable for special status species. The construction for the HDD will be isolated to the parking lot of the Ventura Port District and within the Marina Park worksite described in EIR and shown on Figure 3. Further, no wetlands occur along the alignment. The pipeline under

the Arundell Barranca will be constructed approximately 30 feet below the surface through HDD drilling, ensuring that no species or habitats will be affected.

While construction of the conveyance system will not occur in areas where species or habitats will be affected, implementation of **Mitigation Measures BIO-1** through **BIO-4** will further ensure that nesting birds are not adversely affected. **Mitigation Measure BIO-7** requires the preparation of a drilling fluid management plan to ensure HDD methods do not result in releases of drilling fluid that could harm wildlife or water quality. This finding is consistent with the impact determination in the EIR; no new significant impacts will occur, and no new mitigation measures are required.

Ocean Outfall Design Updates

The extended portion of the ocean outfall will be installed as analyzed in the EIR, but will continue approximately 800 feet further from shore. The area to be affected is within the study area used to assess the ocean floor conditions and is similar to the rest of the installation area. As described in the EIR (see p. 3.11-43), the ocean floor in this area is devoid of hardscape or vegetated areas, consisting of homogenous mud sediment, gently sloping westward. The proposed extension will not alter impacts already analyzed in the EIR, including to marine wildlife and essential fish habitat. Furthermore, the modifications will provide for an occasional 14.8 mgd discharge including tertiary-treated effluent. The discharge will be subject to a new NPDES permit for discharging to the ocean as described in the EIR. The NPDES will be protective of beneficial uses including marine water quality and wildlife. This finding is consistent with the impact determination in the EIR; no new significant impacts will occur, and no new mitigation measures are required.

Ocean Outfall Pipe Assembly Process

This Addendum describes the pipeline assembly process within Marina Park in greater detail than was provided in the EIR. Pipe assembly and transport to the barge will not result in any new or intensified significant impacts on biological resources. This finding is consistent with the impact determination in the EIR; no new significant impacts will occur, and no new mitigation measures are required.

Membrane Bioreactor Treatment Process

Construction of the Membrane Bioreactor will occur on previously disturbed land currently used for VWRf facilities. The construction area is largely on the northern portion of the VWRf, approximately 1,000 feet from the wildlife ponds. New lighting required for the Membrane Bioreactor will resemble the surrounding lighting currently at the VWRf. Further, the temporary noise associated with construction and truck hauling will increase during construction; however, the activities will be over 1,000 feet away from the wildlife ponds and will not result in any new or intensified significant impacts on biological resources. Construction will only occur during the day and will not include 24-hour construction. Therefore, construction and operation of the proposed Membrane Bioreactor will not affect special-status species. However, there is a potential for nesting

birds on-site and near the site to be impacted during construction. Implementation of Mitigation Measures BIO-1 through BIO-4 will ensure that nesting birds are not adversely affected. This finding is consistent with the impact determination in the EIR; no new significant impacts will occur, and no new mitigation measures are required.

Furthermore, as described in the EIR, there is no approved HCP or NCCP within the proposed project area. Construction, or operation and maintenance, of the proposed projects will not conflict with the provisions of any regional or local HCPs or NCCPs. No impacts will occur.

Summary of Potential Effects on Biological Resources

The proposed modifications will not result in substantial changes to biological resources, cause new significant environmental effects, or result in a substantial increase in the severity of previously identified significant effects. In addition, there are no changes in circumstances under which the project is undertaken, or new information of substantial importance with respect to biological resources that would potentially result in a significant new effect.

Cultural Resources

<i>Issues (and Supporting Information Sources):</i>	<i>Yes</i>	<i>No</i>
V. CULTURAL RESOURCES — Would the modifications, changed circumstances, or new information result in new significant impacts or substantially increase the severity of previously identified significant impacts that would::		
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☒

Discussion

a, b, c) Historic, Archaeological, Human Remains

Concentrate Conveyance

As discussed in the Cultural Resources Assessment Report Addendum, the onshore construction activities associated with the concentrate conveyance pipeline will occur within the Schooner Drive and Anchor's Way rights-of-way, as well as a boat storage yard, and portions Marina Park. Much of this area is comprised of paved streets, walking paths, and landscaped lawns. No cultural resources were identified in the landside portion of the Area of Potential Effect (APE) as a result of the site survey. Nonetheless, ground disturbing activities associated with the concentrate conveyance installation including the pits for the HDD, the HDD boring under the Arundell Barranca and open trench methods through the Schooner Drive and Anchor's Way rights-of-way could encounter archaeological deposits that may qualify as historical resources or unique archaeological resources pursuant to CEQA. As such, **Mitigation Measures CUL-1 through CUL-11** included in the Final EIR will be implemented to ensure potential impacts are avoided or minimized. This finding is consistent with the impact determination in the EIR; no new significant impacts will occur, and no new mitigation measures are required.

Ocean Outfall Design Updates

The ocean outfall extension will utilize the same installation methods including excavation as described in the EIR. The area to be affected is included within the APE described in the Cultural Resources Assessment Report Addendum. As discussed in the Cultural Resources Assessment Report Addendum, the ocean floor deposits are from the Late Pleistocene-age and likely pre-date human occupation of the region. Therefore, the area has a low sensitivity for archaeological deposits.

Further, the Harbor Cove Beach site has been subject to prior disturbance associated with the Ventura Harbor Federal Maintenance Dredging Program conducted by USACE. Historically, Ventura Harbor has been dredged by USACE on an annual basis since 1969. The unpaved area is completely disturbed by prior staging activities (storage of vehicles,

equipment and materials, as well as ingress/egress). The construction of the diffuser would not include any excavation activities. Therefore, the area has a low sensitivity for archaeological deposits. Nonetheless, ground disturbing activities associated with the outfall pipeline's installation could encounter archaeological deposits that may qualify as historical resources or unique archaeological resources pursuant to CEQA. As such, **Mitigation Measures CUL-1 through CUL-11** included in the EIR will be implemented to ensure potential impacts are avoided or minimized. This finding is consistent with the impact determination in the EIR; no new significant impacts will occur, and no new mitigation measures are required.

Ocean Outfall Pipe Assembly Process

The pipeline assembly area within Marina Park will not require excavation. The assembly area is located within the APE evaluated in the EIR. The modification would not alter the impact analysis within the EIR.

Membrane Bioreactor Treatment Process

Replacement of the secondary and tertiary treatment process with the Membrane Bioreactor will occur within the current VWRf facilities footprint and will not impact known historic resources that qualify or have the potential to qualify as historical resources. None of the facilities to be demolished is over 50 years old. Although the surrounding area is sensitive for the presence of subsurface archaeological resources, the previous disturbances associated with construction of the VWRf reduces the possibility of impacting intact archaeological deposits. **Mitigation Measures CUL-1 through CUL-11** included in the EIR will be implemented to ensure potential impacts are avoided or minimized. This finding is consistent with the impact determination in the EIR; no new significant impacts will occur, and no new mitigation measures are required.

Summary of Potential Effects on Cultural Resources

The proposed modifications will not result in substantial changes to cultural resources, cause new significant environmental effects, or result in a substantial increase in the severity of previously identified significant effects. In addition, there are no changes in circumstances under which the project is undertaken, or new information of substantial importance with respect to cultural resources that would potentially result in a significant new effect.

Energy

<i>Issues (and Supporting Information Sources):</i>	<i>Yes</i>	<i>No</i>
VI. ENERGY — Would the modifications, changed circumstances, or new information result in new significant impacts or substantially increase the severity of previously identified significant impacts that would::		
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☒
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☒

Discussion

a, b) Wasteful Use, Plan Consistency

All Components

Construction of the proposed modifications will not require a substantial increase in energy use. Construction methods would be similar to those evaluated in the EIR. The concentrate conveyance pipeline will reduce the linear distance of the pipeline, resulting in less open trench construction activities. The HDD methods used for both the ocean outfall and the concentrate conveyance pipeline installation will occur within the duration estimated in the EIR for the ocean outfall. As a result, energy use will not increase. Construction of the Membrane Bioreactor will increase the duration of construction at the VWRf compared to the estimates in the EIR, but will not significantly increase energy consumption for construction activities. The construction of the new Membrane Bioreactor will substantially improve effluent quality and upgrade aging infrastructure serving a vital public function and would therefore not be considered wasteful, inefficient, or unnecessary.

Once constructed the Membrane Bioreactor will require more energy to operate than the current VWRf upgrades analyzed in the EIR. **Table 3** summarizes energy demands for the VWRf once updated with Membrane Bioreactor. Energy demand would double when compared to existing conditions. This energy demand will be supplied from the existing electrical grid and will not require additional energy production facilities or conveyance infrastructure. The operation of the new Membrane Bioreactor processes will substantially improve effluent quality and upgrade aging infrastructure serving a vital public function and would therefore not be considered wasteful, inefficient, or unnecessary.

**TABLE 3
ENERGY DEMAND**

Project Component	Annual Energy Consumption (kWh/yr)	
	Existing	With Project
Membrane Bioreactor Blower & Electrical Building	--	4,207,000
UV System	--	405,500
Aeration Basins	3,579,200	3,579,200
Total	3,579,200	8,191,700

As described in the EIR, construction of the project will be consistent with applicable State and federal energy standards, including the use of construction contractors with equipment and vehicle fleets that are in compliance with State anti-idling requirements (13 CCR Section 2485), State regulations that require construction contractors to phase-in newer emission-controlled models of heavy-duty off-road equipment (13 CCR Section 2449), and federal fuel efficiency standards for medium- and heavy-duty trucks. Construction of the ocean outfall, conveyance pipeline, and the Membrane Bioreactor will not significantly exceed the estimated annual fuel consumption. As such, the project modifications will not result in wasteful, inefficient, and unnecessary consumption of energy during construction or conflict with energy conservation plans. The project will have a nominal effect on regional energy consumption during the construction period, and existing or reasonably foreseeable fuel supplies would be expected to meet the project's construction energy demand. As a result, project construction and operation will not result in the need to construct new energy facilities or expand existing facilities. This finding is consistent with the impact determination in the EIR; no new significant impacts will occur, and no new mitigation measures are required.

Summary of Potential Effects on Energy

The proposed modifications will not cause new significant environmental effects, and would not result in a substantial increase in the severity of previously identified significant effects. In addition, there are no changes in circumstances under which the project is undertaken, or new information of substantial importance with respect to energy that would potentially result in a significant new effect.

Geology and Soils

<i>Issues (and Supporting Information Sources):</i>	<i>Yes</i>	<i>No</i>
VII. GEOLOGY AND SOILS — Would the modifications, changed circumstances, or new information result in new significant impacts or substantially increase the severity of previously identified significant impacts that would:		
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:		
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☒
ii) Strong seismic ground shaking?	☐	☒
iii) Seismic-related ground failure, including liquefaction?	☐	☒
iv) Landslides?	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☒
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☒
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☒
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒

Discussion

a, b, c, d, e) Seismic, Soil Erosion, Unstable Soils, Expansive Soils, Septic Systems

Concentrate Conveyance

The new alignment of the conveyance pipeline will not be located on an active fault. The conveyance pipeline does not include any habitable structures and will not put new residents at risk. Therefore, construction and operation of the HDD boring under the Arundell Barranca and open trench methods through the Schooner Drive and Anchor's

Way rights-of-ways will not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault. Furthermore, the potential for encountering unstable soils or expansive soils would be similar to the analysis in the EIR (see p. 3.6-24). Project designs will be required to comply with California Building Code (CBC) design standards. Construction will be required to comply with **Mitigation Measure GEO-2** to minimize erosion during construction. No new septic systems would be installed. This finding is consistent with the impact determination in the Final EIR; no new significant impacts will occur, and no new mitigation measures are required.

Ocean Outfall Design Updates

The proposed outfall extension will extend the proposed outfall by approximately 800 feet. No permanent structures will be placed aboveground other than at-grade hatches to underground vaults within Marina Park. These hatches will be approximately 10-feet by 20-feet and at grade level. The construction area is not located within a fault rupture zone, but the area is subject to liquefaction hazards due to shallow groundwater (see Figure 3.6-2 of the EIR). The underground vaults are at risk of liquefaction due to the shallow groundwater, creating a potentially significant impact related to seismic-related ground failure. However, implementation of Mitigation Measure GEO-1 from the EIR, requiring a soils report and a geotechnical investigation report to be prepared for all facilities at risk of liquefaction, will reduce the risk of liquefaction hazards.

The outfall extension would be constructed in an upland area of Harbor Cove Beach. Only the diffuser will be assembled in this location at Harbor Cove Beach. The HDD and seafloor segments will still be constructed at and launched from Marina Park. The outfall extension does not include any habitable structures and will not put new residents at risk. Therefore, implementation of the outfall extension will not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, ground shaking, liquefaction, or landslide hazards. Furthermore, the potential for encountering unstable soils or expansive soils will be similar to the analysis in the EIR (see p.3.6-25). Project designs will be required to comply with CBC design standards. No new septic systems will be installed. Therefore, the modifications do not alter the impact analysis within the Geology, Soils and Seismicity Section of the EIR.

Ocean Outfall Pipe Assembly Process

The new outfall pipeline will be assembled in Marina Park. The construction area is not located within a fault rupture zone, but the area is subject to liquefaction hazards due to shallow groundwater (see Figure 3.6-2 of the EIR). However, no excavation will be required and no structures will be built that could be affected by liquefaction, unstable soils or expansive soils. Construction in the park would not include any habitable structures and will not put new residents at risk. Therefore, construction at Marina Park and transporting the pipeline to the installation barge will not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death

involving rupture of a known earthquake fault. Therefore, the modifications would not alter the impact analysis within the Geology, Soils and Seismicity Section of the EIR.

Membrane Bioreactor Treatment Process

Existing secondary and tertiary facilities in the VWRP will be replaced with a new Membrane Bioreactor. The Membrane Bioreactor will not be located on active faults, with the closest fault (Oak Ridge fault) approximately 0.5-mile north of the VWRP. As a result, the construction area is not located within a fault rupture zone, but the area is subject to liquefaction hazards due to shallow groundwater (see Figure 3.6-2 of the EIR). The Membrane Bioreactor would be at risk of liquefaction due to the shallow groundwater, creating a potentially significant impact related to seismic-related ground failure. However, implementation of **Mitigation Measure GEO-1** from the EIR, requiring a soils report and a geotechnical investigation report to be prepared for all facilities at risk of liquefaction, would reduce the risk of liquefaction hazards. Further, the Membrane Bioreactor does not include any habitable structures, and would not put new residents at risk. Like all of Southern California, the project area is located in a seismically active region and has the potential to experience strong ground shaking. The Oak Ridge fault is within the vicinity of the project area. A major earthquake associated with this fault could result in moderate to severe ground shaking in the project area and would be a potential hazard to the proposed projects. Damage to the Membrane Bioreactor could be expected as a result of ground shaking during a major seismic event. However, like the proposed project, the Membrane Bioreactor would be constructed according to CBC requirements, which include seismic design stipulations designed to reduce effects from ground shaking on these structures and minimize structural damage (see p. 3.6-19 of the EIR).

Construction of the Membrane Bioreactor will not result in substantial soil erosion or the loss of topsoil. The construction footprint of the Membrane Bioreactor would likely not disturb more than an acre of ground surface, and construction would be required to comply with **Mitigation Measure GEO-2**. Mitigation Measure GEO-2 entails implementation of various BMPs, including erosion- and sedimentation-control BMPs on-site designed to prevent stormwater-driven and wind-driven erosion and the movement of topsoil off site. Therefore, erosion would be minimized during the construction of the Membrane Bioreactor (see p. 3.6-22 of EIR).

With implementation of all CBC and related federal, state, and local standards, and the mitigation measures set forth in the EIR, construction and operational impacts related to ground shaking, unstable soils, and expansive soils are less than significant. This finding is consistent with the impact determinations in the Geology, Soils, and Seismicity Section of the EIR; no new significant impacts will occur, and no new mitigation measures are required.

f) Paleontological Resources

All Components

As noted in the EIR Impact CUL 3.5-3 (see p.3.5-54), project ground-disturbing activities exceeding depths of 20 feet have the potential to impact paleontological resources located

within the older Quaternary alluvium underlying the veneer of Holocene-age alluvium that comprises the project's surface deposits. The pipeline under the Arundell Barranca will be approximately 30 below the surface. As a result, there exists the possibility of direct or indirect destruction of unique paleontological resources and/or unique geologic features during the drill operation. Implementation of **Mitigation Measures CUL-7** through **CUL-10** is required to ensure potential impacts associated with the construction of the modifications to unique paleontological resources or unique geologic features are less than significant. The modifications do not alter the impact analysis within the Cultural Resource Section of the EIR.

Summary of Potential Effects on Geology and Soils

The proposed modifications will not result in substantial changes to geology and soils, cause new significant environmental effects, or result in a substantial increase in the severity of previously identified significant effects. In addition, there are no changes in circumstances under which the project is undertaken, or new information of substantial importance with respect to geology and soils that would potentially result in a significant new effect.

References

- California Department of Conservation (DOC), 2003. California Geological Survey: Ventura Quadrangle. Available at:
<https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=regulatorymaps>. Retrieved on April 19, 2022.
- County of Ventura (COV), 2013. Ventura County General Plan Hazards Appendix. Available at <https://vcrma.org/ventura-county-general-plan>. Last amended on October 22, 2013.
- City of Ventura, 2005. City of Ventura General Plan Environmental Impact Report. Available at <https://www.cityofventura.ca.gov/DocumentCenter/View/2303>.
-

Greenhouse Gas Emissions

<i>Issues (and Supporting Information Sources):</i>	<i>Yes</i>	<i>No</i>
VIII. GREENHOUSE GAS EMISSIONS — Would the modifications, changed circumstances, or new information result in new significant impacts or substantially increase the severity of previously identified significant impacts that would:		
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☒
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☒

Discussion

a, b) GHG Emissions, Plan Consistency

All Modifications

As discussed in Section 3.7, GHG, of the EIR (see p. 3.7-15), the project before modification would generate 4,497 MT of CO₂e per year. Construction of the additional 800 feet of ocean outfall, conveyance pipeline, and modified pipeline assembly process would not generate additional CO₂e. Reduction in the length of the concentrate conveyance pipeline will reduce construction GHG emissions compared to the estimates in the EIR. However, construction and operation of the new MBR Treatment Facilities would increase GHG emissions compared to the analysis in the EIR. The total amount of CO₂e produced by the construction and operation of the proposed project (including the new emissions from the MBR) would not exceed the CAPCOA 10,000 MT of CO₂e per year threshold as summarized in **Table 4**. In addition, the construction and operation would adhere to the 2016 Title 24 standards that include building energy efficiency requirements for reduced consumption of electricity, natural gas, and other fuels from buildings subject to the standards.

**TABLE 4
TOTAL PROJECT GHG EMISSIONS**

MBR GHG Summary (Full Buildout Year 2026)	
Category	mTCO₂e/yr
Mobile	183
Area	<1
Energy	917
Waste	23
Water	38
Amortized Construction (30 years)	42
MBR Total	1,204
Previous Total in EIR	4,497
Update Project Total	5,701

mTCO₂e=Metric Tons Carbon Dioxide equivalents

Therefore, the project's generation of GHG emissions is not cumulatively considerable because of the scope of the emissions (i.e., the project would not exceed the 10,000 MT of CO₂e per year threshold) and because the project does not conflict with an applicable plan, policy or regulation for the purposes of reducing the emissions of greenhouse gasses.

Electricity demand from the Membrane Bioreactor will be increased as compared to current electricity demand levels, but on the effect on regional energy consumption is nominal. Reasonably foreseeable electricity supplies would be expected to meet the project's electricity demand, and operation of the facilities will not result in the need to construct new energy facilities or expand existing facilities. In addition, electric utility providers are required to comply with the state's Renewables Portfolio Standard. Consequently, the project as modified will not generate substantial amounts of GHG emissions that would hinder the state's ability to achieve the goal under HSC Division 25.5 of achieving 1990 levels of GHG emissions by 2020.

In addition, project GHG emissions are predicted to decline with implementation of the regulatory initiatives identified by CARB in the Scoping Plan as well as other technological innovations. The proposed addendum modifications will not conflict with or impede the future statewide GHG emission reductions goals. CARB has outlined a number of potential strategies for achieving the 2030 reduction target of 40 percent below 1990 levels. These potential strategies include renewable resources for half of the state's electricity by 2030, reducing petroleum use in cars and trucks, and reducing the carbon content of transportation fuels. The proposed modifications will comply with these future regulations, as promulgated by the USEPA, CARB, CEC, or other agencies. As a result, the proposed projects would be expected to exhibit a declining GHG emissions trajectory, in line with future state GHG reductions goals codified in HSC Division 25.5 for 2030. This finding is consistent with the impact determination in the EIR; no new significant impacts will occur, and no new mitigation measures are required.

Summary of Potential Effects on Greenhouse Gas Emissions

The proposed modifications will not result in substantial changes to GHG, cause new significant environmental effects, or result in a substantial increase in the severity of previously identified significant effects. In addition, there are no changes in circumstances under which the project is undertaken, or new information of substantial importance with respect to GHG that would potentially result in a significant new effect.

Hazards and Hazardous Materials

<i>Issues (and Supporting Information Sources):</i>		<i>Yes</i>	<i>No</i>
IX. HAZARDS AND HAZARDOUS MATERIALS —			
Would the modifications, changed circumstances, or new information result in new significant impacts or substantially increase the severity of previously identified significant impacts that would::			
a)	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☒
b)	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☒
c)	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☒
d)	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☒
e)	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☒
f)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☒
g)	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	☐	☒

Discussion

a, b, c, d, e, f) Hazardous Materials, Upset, Proximity to School, Cortese Site, Proximity to Airport, Emergency Plan Consistency

Ocean Outfall Pipe Assembly and Concentrate Conveyance

Construction for the conveyance pipeline and pipeline assembly at Marina Park will involve drilling, trenching, excavation, grading, and other ground-disturbing activities. These construction activities require small amounts of routinely used hazardous materials, including petroleum products (i.e., oil, gasoline, and diesel fuels), automotive fluids (i.e., antifreeze and hydraulic fluids), and other chemicals (i.e., adhesives, solvents, paints, thinners, and other chemicals). No acutely hazardous materials will be used on site during construction. The materials handled will not pose a significant risk off site to the public. In addition, best management practices (BMPs) will be included in the Storm Water Pollution Prevention Plan (SWPPP) that will be required for the proposed modifications, to prevent accidental release of hazardous materials into the environment that could affect soils or contaminate groundwater. Further, the construction contractor

will be required to comply with all applicable federal, state, and local regulations pertaining to hazardous material use, handling, storage, and disposal (see p. 3.8-10). . Adherence to these regulations will reduce potential proposed projects construction impacts related to hazardous materials to less than significant levels. Once constructed, the conveyance pipeline and outfall will not require the use of chemicals or hazardous materials

The proposed project is not located within one-quarter mile of an existing or proposed school. The closest school to the project area is Pierpont Elementary School (1254 Marthas Vineyard Ct, Ventura, CA 93001), located approximately 0.35 miles north of the project area. Therefore, the proposed project will not emit or handle hazardous materials within one-quarter mile of a school, and no impact would occur.

The proposed conveyance pipelines, the proposed Ocean Outfall extension, and the Marina Park are over 4 miles north of Oxnard Airport, the closest airport to the project site. The proposed project components will not be located within the Oxnard Airport hazard zones. Impacts will be less than significant.

The conveyance pipeline will be constructed within road rights-of-way. Therefore, these components could potentially result in temporary lane or roadway closures or block access to roadways and driveways for emergency vehicles. As detailed in Section 3.17, Traffic and Transportation, **Mitigation Measure TRAF-1** requires construction contractors to notify emergency responders, including local fire departments, police departments, and ambulances, of planned roadway closures and/or roadway and driveway blockages. Conveyance facilities within rights-of-way will be installed belowground and will not interfere with roadways during operation, such that no impact would occur. Therefore, construction will not substantially impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan requiring the use of these roadways with implementation of Mitigation Measure TRAF-1. This finding is consistent with the impact determination in the EIR; no new significant impacts will occur, and no new mitigation measures are required.

Ocean Outfall Design Update

The proposed outfall, including the 800-foot extension, will be constructed within an upland area of Harbor Cove Beach (see Figure 7) and will discharge offshore in the ocean north of Ventura Harbor. Only the diffuser will be assembled in this location at Harbor Cove Beach. The HDD and seafloor segments will still be constructed at and launched from Marina Park. The extension of the outfall will not change the construction or operational phases from what was analyzed in the EIR. The extension will be subject to **Mitigation Measure HAZ-1**, requiring the preparation of an Anchoring Plan to ensure marine vessels are moored effectively and safely, and **Mitigation Measure HAZ-2** covering safety measures needed for marine construction activities (see p. 3.8-16) No new significant impacts will occur, and no new mitigation measures are required.

Membrane Bioreactor Treatment Process

Construction of the Membrane Bioreactor will involve excavation, grading, paving and other ground-disturbing activities. These construction activities require small amounts of routinely used hazardous materials, but no acutely hazardous materials will be used on site during construction. The materials handled do not pose a significant risk off site to the public and will primarily be used within the existing VWRf site. In addition, BMPs will be included in the SWPPP that will be required for the proposed modifications, to prevent accidental release of hazardous materials into the environment that could affect soils or contaminate groundwater. Once constructed, the VWRf will routinely receive deliveries, store, and use chemicals need for the treatment processes. These chemicals will be similar to the chemicals currently stored and used on site (see Table 2-8 of the EIR). The modifications do not alter the impact analysis within the EIR.

There are two active hazardous materials sites located near the existing VWRf. These sites consist of voluntary cleanup sites, ongoing evaluations, corrective actions, and one leaking underground storage tank (LUST). While these designated sites are not located on the proposed VWRf, groundwater or soil movement could have caused contamination to migrate into the project area. With implementation of Mitigation Measure GEO-2, requiring BMPs and compliance with existing standards, construction of the Membrane Bioreactor will not create a significant hazard to the public or environment. This finding is consistent with the impact determination in the EIR; no new significant impacts will occur, and no new mitigation measures are required.

g) Wildfire

All Modifications

The implementation of the project modifications does not change the previous analysis provided in the EIR (see p. 3.8-25). The construction and operation of the ocean outfall, conveyance pipelines, and the Membrane Bioreactor in the locations proposed would not expose workers and/or neighboring residential areas or structures to wildland fires. This finding is consistent with the impact determination in the EIR; no new significant impacts will occur, and no new mitigation measures are required.

Summary of Potential Effects on Hazards and Hazardous Materials

The proposed modifications will not result in substantial changes to hazards and hazardous materials, cause new significant environmental effects, or result in a substantial increase in the severity of previously identified significant effects. In addition, there are no changes in circumstances under which the project is undertaken, or new information of substantial importance with respect to hazards and hazardous materials that would potentially result in a significant new effect.

References

California Department of Forestry and Fire Protection (CAL FIRE), 2022. Fire Hazard Severity Zone Viewer. Available at: <https://egis.fire.ca.gov/FHSZ/>. Accessed April 25, 2022.

Hydrology and Water Quality

<i>Issues (and Supporting Information Sources):</i>		<i>Yes</i>	<i>No</i>
X. HYDROLOGY AND WATER QUALITY — Would the modifications, changed circumstances, or new information result in new significant impacts or substantially increase the severity of previously identified significant impacts that would:			
a)	Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☒
b)	Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☒
c)	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:		
i)	result in substantial erosion or siltation on- or off-site;	☐	☒
ii)	substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	☐	☒
iii)	create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☒
iv)	impede or redirect flood flows?	☐	☒
d)	In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☒
e)	Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☒

Discussion

a) *Violate Water Quality Standards*

Concentrate Conveyance

A product conveyance system will transport brine concentrate waste to the ocean outfall. As addressed in the EIR (see p. 3.9-53), during the construction phase, construction equipment and materials would use fuels, oils, lubricants, solvents, cleaners, cements, adhesives, paints, thinners, degreasers, cement and concrete, which are all commonly used in construction. Routine use or an accidental spill of hazardous materials could result in inadvertent releases, which could adversely affect the water quality of stormwater and/or surface water bodies. Compliance with hazardous materials and stormwater regulations that govern the transportation, use, handling, and disposal of hazardous materials, and controlling runoff from construction activities will reduce the potential for adverse effects to water quality to less than significant.

The EIR evaluates the use of HDD construction methods on page 3.9-61. The HDD construction of the Arundell Barranca pipeline will employ the same construction methods and would be subject to the same permit requirements. It will not create any water quality impacts that were not evaluated in the EIR. Excavation activities may encounter groundwater that would need to be dewatered prior to working in the excavated area. Dewatering flows would be discharged to the sanitary sewer system, or would be discharged pursuant to and in compliance with the General NPDES Permit and Waste Discharge Requirements for Discharges of Groundwater from Construction and project Dewatering to Surface Waters (Los Angeles Regional Water Quality Control Board Order No. R4-2018-0125; NPDES Permit No. CAG994004). Compliance with those requirements will avoid and minimize adverse impacts to surface waters from dewatering activities.

In order to ensure that HDD methods do not result in the uncontrolled release of drilling fluid into the harbor, the contractor is required to implement BMPs to prevent inadvertent releases as well as emergency response readiness in case of an inadvertent uncontrolled release of fluids. As concluded on page 3.9-62 of the EIR, compliance with permit requirements will ensure that impacts would be less than significant with implementation of mitigation. These permit requirements equally apply to the HDD methods proposed for the conveyance alignment alternative. Once operational, the conveyance systems will be underground and would not affect water quality. This finding is consistent with the impact determination in the EIR; no new significant impacts will occur, and no new mitigation measures are required.

Ocean Outfall Design Updates

As discussed in Section 3.9.4 of the EIR (see p. 3.9-59), offshore construction of the proposed outfall structure would involve activities on the ocean surface (on anchored barges) as well as underwater and on the ocean floor (in-water construction). In-water construction activities would include dredging of the ocean bottom, the placement of outfall components, and placement of anchoring rock material. The additional 800 feet does not alter the construction methods and would not alter impacts to water quality from operation of the facility.

The EIR described the need for discharging up to 6.5 mgd of tertiary treated effluent occasionally to the ocean to comply with prohibitions for discharges to the SCRE. Following hydraulic modeling, the outfall is now designed to convey up to 14.8 mgd to accommodate maximum modeled flows. The EIR analyzed the potential for tertiary-treated effluent to be discharge to the ocean and concluded that the occasional addition of tertiary-treated effluent would dilute the concentrate effluent and create a more buoyant plume. The additional volume capacity of the tertiary discharge will not change the anticipated concentrations of constituents within the effluent. Although the increased capacity of the system may result in a larger zone of initial dilution compared to the assumptions made in the EIR, the diffusers at the end of the outfall will be designed to minimize the zone of initial dilution area, assuming some periods of 14.8 mgd discharge volume. The increase from 6.5 mgd to 14.8 mgd would not result in a new significant

impact to water quality since the discharge of tertiary effluent was already evaluated in the EIR and will be subject NPDES permit authorization. Furthermore, the addition of MBR treatment will improve the effluent quality compared to the assumptions made in the EIR. As a result, the increased discharge volume capacity will not result in a new significant impact not analyzed in the EIR. The City will prepare a Report of Waste Discharge for the proposed ocean discharge that will identify the maximum volume of tertiary-treated effluent to be discharged to the ocean at any given time. The new ocean outfall NPDES permit will identify water quality limits that are protective of beneficial uses in the marine environment during periods when only RO concentrate is discharged and during periods when tertiary treated effluent is discharged. As a result, the modifications do not alter the impact analysis within the Hydrology and Water Quality Section of the EIR.

Ocean Outfall Pipe Assembly Process

As mentioned in the EIR, during the construction phase, construction equipment and materials used will include fuels, oils, lubricants, solvents, cleaners, cements, adhesives, paints, thinners, degreasers, cement and concrete, which are all commonly used in construction. Routine use or an accidental spill of hazardous materials could result in inadvertent releases, which could adversely affect the water quality of stormwater and/or surface water bodies. Assembly of the pipeline within Marina Park will involve fusing HPDE pipe segments and floating the fused segments into the harbor, and the fused pipeline joints will be sanded to remove any rough areas or debris inside and outside of the pipeline. This process will be conducted within a specific area that will be equipped with stormwater BMPs to ensure no construction debris is left the site. The assembly process does not require excavation or have the potential to result in local soil erosion that could adversely affecting water quality.

As discussed in Impact 3.8-1 in Section 3.8 Hazards and Hazardous Materials of the EIR (see p. 3.8-12), construction activities will be required to comply with numerous hazardous materials regulations designed to ensure that hazardous materials are transported, used, stored and disposed of in a safe manner to protect worker safety, and to reduce the potential for a release of construction-related fuels or other hazardous materials into the environment, including stormwater and nearby surface water bodies. Contractors will be required properly store hazardous materials in appropriate containers, that spill prevention measures are implemented, and that spill response procedures are in place to respond to accidental releases. The California Fire Code also requires measures for the safe storage and handling of hazardous materials.

The project will comply with the Construction General Permit requiring preparation and implementation of a SWPPP to control runoff from construction work sites. Implementation of BMPs, including physical barriers to prevent erosion and sedimentation, construction of sedimentation basins, limitations on work periods during storm events, use of infiltration swales, protection of stockpiled materials, and a variety of other measures will substantially reduce the potential for impacts to surface water quality from occurring during construction. This finding is consistent with the impact

determination in the EIR; no new significant impacts will occur, and no new mitigation measures are required.

Membrane Bioreactor Treatment Process

Construction would involve replacing the secondary and tertiary facilities with a Membrane Bioreactor. As addressed in the EIR (see p. 3.8-12), during the construction phase, construction equipment and materials will include fuels, oils, lubricants, solvents, cleaners, cements, adhesives, paints, thinners, degreasers, cement and concrete, which are all commonly used in construction. Routine use or an accidental spill of hazardous materials could result in inadvertent releases, which could adversely affect the water quality of stormwater and/or surface water bodies. Compliance with hazardous materials and stormwater regulations that govern the transportation, use, handling, and disposal of hazardous materials, and controlling runoff from construction activities will reduce the potential for adverse effects to water quality to less than significant.

As previously discussed above, required compliance with existing hazardous materials and stormwater regulations that govern the transportation, use, handling, and disposal of hazardous materials, and controlling runoff from construction activities, will reduce the potential for adverse effects to water quality to less than significant during both construction and operation of the facility. The new MBR treatment technologies are designed to substantially improve tertiary effluent quality, particularly with respect to nutrients. The proposed modifications would not introduce new significant impacts, and no new mitigation measures are required.

b) Substantially Deplete Groundwater Supplies

Concentrate Conveyance

Construction in Marina Park will involve excavation, grading, trenching, and soil stockpiling. HDD methods used for the pipeline to cross the harbor channel will not interfere with groundwater recharge since the method does not affect any permanent above ground impermeable surfaces that could have an impact on groundwater supplies. The park will be restored to pre-construction conditions when construction of the conveyance pipeline is complete.

Once operational, the conveyance pipelines will not affect recharge or groundwater supplies. This finding is consistent with the impact determination in the EIR (see p. 3.9-76); no new significant impacts will occur, and no new mitigation measures are required.

Ocean Outfall Design Updates

Construction and operation of the additional 800 feet of outfall will not affect groundwater supplies. Groundwater would not be affected. Construction would occur for approximately 20 days in an upland area of Harbor Cove Beach. The work area is not currently a significant recharge area and would not include any permanent impervious surfaces. As a result, the project will not affect groundwater supplies. This finding is

consistent with the impact determination in the EIR; no new significant impacts will occur, and no new mitigation measures are required.

Ocean Outfall Pipe Assembly Process

Construction in Marina Park will not affect groundwater supplies because it will not require excavation or other activities affecting groundwater. This finding is consistent with the impact determination in the EIR; no new significant impacts would occur, and no new mitigation measures are required.

Membrane Bioreactor Treatment Process

The Membrane Bioreactor facilities will be located on already developed portion of the VWRf. The implementation of the Membrane Bioreactor facilities would reduce impervious surfaces since the facility would have a smaller foot print as the current facilities to be demolished. The proposed sites are not currently significant recharge areas. As a result, the project will not affect groundwater supplies. This finding is consistent with the impact determination in the EIR (see p. 3.9-78); no new significant impacts would occur, and no new mitigation measures are required.

c.i-iv) Alter Drainages

Concentrate Conveyance

The conveyance pipelines will be installed underground with the overlying land use restored to its original condition. No change to the pre-existing drainage pattern will occur. This finding is consistent with the impact determination in the EIR; no new significant impacts will occur, and no new mitigation measures are required.

Ocean Outfall Design Updates

The new outfall will be offshore within the ocean and will not affect drainage patterns. Construction of the diffuser would last for approximately 20 days. No change to the pre-existing drainage pattern will occur. This finding is consistent with the impact determination in the EIR; no new significant impacts will occur, and no new mitigation measures are required.

Ocean Outfall Pipe Assembly Process

The HDPE ocean outfall will be assembled in the paved parking lot of the Marina Park. No drainages will be affected. This finding is consistent with the impact determination in the EIR; no new significant impacts will occur, and no new mitigation measures are required.

Membrane Bioreactor Treatment Process

The Membrane Bioreactor will be installed within the existing VWRf site. The new infrastructure will not alter the drainage pattern of existing land surface. The Membrane

Bioreactor facilities will have a smaller foot print than the existing facilities to be demolished. As a result, the implementation of the Membrane Bioreactor is expected to reduce the hardscape and would reduce concentrated flow that could result in erosion or siltation on- or off-site. Nevertheless, compliance with the MS4 permit will limit the potential for adverse impacts caused by drainage issues related to erosion, siltation, flooding, or drainage system capacity. Therefore, impacts are less than significant (see p. 3.9-81 of the EIR). This finding is consistent with the impact determination in the EIR; no new significant impacts will occur, and no new mitigation measures are required.

e) Flood Hazard

Concentrate Conveyance

The conveyance pipelines will be installed underground, and will not be subject to tsunamis or flooding hazards. The modifications do not alter the impact analysis within the EIR.

Ocean Outfall Design Updates

The 800-foot extension for the outfall does not alter the assessment in the EIR (see p. 3.9-84). This finding is consistent with the impact determination in the EIR; no new significant impacts would occur, and no new mitigation measures are required.

Ocean Outfall Pipe Assembly Process

Assembly of the pipeline will be temporary. Once constructed, the pipelines will be located underground and on the ocean floor. The assembly modifications do not alter the impact analysis within the EIR.

Membrane Bioreactor Treatment Process

The Membrane Bioreactor will be built within the VWRf site, which is located outside of the tsunami hazard zone. Therefore, the Membrane Bioreactor facilities will not increase the risk of impacts from tsunamis. This finding is consistent with the impact determination in the EIR; no new significant impacts will occur, and no new mitigation measures are required.

f) Groundwater Sustainability

All Modifications

The proposed modifications do not conflict with local groundwater sustainability plans. None of the structures will impact groundwater or conflict with water quality control plans. No impacts to groundwater quality objectives or sustainable groundwater management plans would occur. This finding is consistent with the impact determination in the EIR; no new significant impacts will occur, and no new mitigation measures are required.

Summary of Potential Effects on Hydrology and Water Quality

The proposed modifications will not result in substantial changes to hydrology and water quality, cause new significant environmental effects, or result in a substantial increase in the severity of previously identified significant effects. In addition, there are no changes in circumstances under which the project is undertaken, or new information of substantial importance with respect to hydrology and water quality that would potentially result in a significant new effect.

Land Use and Planning

<i>Issues (and Supporting Information Sources):</i>	<i>Yes</i>	<i>No</i>
XI. LAND USE AND PLANNING — Would the modifications, changed circumstances, or new information result in new significant impacts or substantially increase the severity of previously identified significant impacts that would::		
a) Physically divide an established community?	☐	☒
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☒

Discussion

a, b) Physically Divide a Community or Conflict with Land Use Plans

Concentrate Conveyance

The pipeline will be installed underground, largely within public rights-of-way and under the Arundell Barranca channel (see p. 3.10-22 of the EIR). Similar to the proposed project, the City will obtain an easement for crossing private property. Installation of the pipeline will require a coastal development permit from the California Coastal Commission (CCC) to cross under the harbor. The pipeline within city streets will require a coastal development permit (CDP) from the City pursuant to the Local Coastal Plan (LCP). Construction will be temporary and would not divide a community. Once the pipelines are constructed, they will be located entirely underground and would not create a barrier or physically divide an established community. This finding is consistent with the impact determination in the Final EIR; no new significant impacts will occur, and no new mitigation measures are required.

Ocean Outfall Design Updates

The diffuser will be constructed on an upland area of Harbor Cove Beach. Only the diffuser will be assembled in this location at Harbor Cove Beach. The HDD and seafloor segments will still be constructed at and launched from Marina Park. The work area has historically been used as a storage and staging area for the annual dredging operation for the harbor. The site is owned by the Port District, and the land use designation is commerce and the site is zoned harbor commercial. The construction activities will last

up to two weeks and once completed, all equipment will be removed from the site. Construction will be temporary and would not divide a community.

The outfall extension will be placed along the ocean floor subject to a CDP from the CCC. The modifications will not alter the impact analysis within the EIR.

Ocean Outfall Pipe Assembly Process

The temporary use of Marina Park as an assembly location will not divide a community or conflict with land use plans. This finding is consistent with the impact determination in the EIR; no new significant impacts will occur, and no new mitigation measures are required.

Membrane Bioreactor Treatment Process

A new Membrane Bioreactor facility will be constructed at the VWRF. Construction and operation of the proposed facility will not create a barrier or physically divide an established community. In addition, the new infrastructure will be consistent with land use designations and zoning codes for the facility. This finding is consistent with the impact determination in the EIR; no new significant impacts will occur, and no new mitigation measures are required.

Summary of Potential Effects on Land Use

The proposed modifications will not result in substantial changes to land use, cause new significant environmental effects, or result in a substantial increase in the severity of previously identified significant effects. In addition, there are no changes in circumstances under which the project is undertaken, or new information of substantial importance with respect to land use that would potentially result in a significant new effect.

Marine Biology

<i>Issues (and Supporting Information Sources):</i>	<i>Yes</i>	<i>No</i>
XII. Marine Biology — Would the modifications, changed circumstances, or new information result in new significant impacts or substantially increase the severity of previously identified significant impacts that would::		
a) Have a substantial adverse effect on any species, natural community, or habitat, including candidate, sensitive, or special-status species identified in local or regional plans, policies, regulations or conservation plans (including protected wetlands or waters, critical habitat, EFH) or as identified by the CDFW, USFWS, or NMFS. Substantial adverse effects include direct effects and habitat modifications, including direct disturbance, removal, filling, hydrological interruption, and discharge?	☐	☒
b) Threaten to eliminate a marine plant or animal wildlife community or cause a fish or marine wildlife population to drop below self-sustaining levels?	☐	☒
c) Interfere substantially with the movement of any native resident or migratory fish or marine wildlife species, or with established native resident or migratory wildlife corridors, or impede the use of native marine wildlife nursery sites?	☐	☒
d) Introduce or spread an invasive non-native species?	☐	☒

Discussion

Upland components of the proposed modifications, including the Concentrate Conveyance Alignment, Ocean Outfall Pipe Assembly Process and Membrane Bioreactor Treatment Process, will not be addressed in this section. See Section IV, Biological Resources, which discusses potential effects of the upland project modifications. This section will evaluate potential marine effects associated with the ocean outfall design updates.

a) Have a substantial adverse effect on any species, natural community, or habitat, including candidate, sensitive, or special-status species identified in local or regional plans, policies, regulations or conservation plans (including protected wetlands or waters, critical habitat, EFH) or as identified by the CDFW, USFWS, or NMFS. Substantial adverse effects include direct effects and habitat modifications, including direct disturbance, removal, filling, hydrological interruption, and discharge?

The extended portion of the ocean outfall will be installed as analyzed in the EIR (see Impact MARINE 3.11-1, p. 3.11-42), but will continue 800 feet further from shore. The area to be affected is within the study area used to assess the ocean floor conditions and is similar to the rest of the installation area. As described in the EIR (see p. 3.11-42), the ocean floor in this area is devoid of hardscape or vegetated areas, consisting of homogenous mud sediment, gently sloping westward. The modification will still require compliance with Mitigation Measure MARINE-1 through MARINE-3. In addition, the modifications include the potential to increase discharges from 6.5 mgd to 14.8 mgd. The occasional additional discharge volumes will comply with NPDES permit limitations that are designed to be protective of beneficial uses, including the marine environment. The proposed extension and

increased discharge volume will not alter impacts already analyzed in the EIR, including to marine wildlife and essential fish habitat. This finding is consistent with the impact determination in the EIR; no new significant impacts will occur, and no new mitigation measures are required.

b) Threaten to eliminate a marine plant or animal wildlife community or cause a fish or marine wildlife population to drop below self-sustaining levels?

The extended portion of the ocean outfall will be installed as analyzed in the EIR, but will continue 800 feet further from shore. As concluded in the EIR (see p. 3.11-57), the organisms and species inhabiting the new outfall pipeline area are common throughout the Ventura County coastline and would be expected to reestablish themselves and return to pre-disturbance distributions and species compositions shortly after restoration of the habitats and are not expected to fall below self-sustaining levels. Furthermore, the additional discharge volumes of up to 14.8 mgd would be compliant with NPDES discharge permits that are designed to be protective of all beneficial uses including marine species. This finding is consistent with the impact determination in the EIR; no new significant impacts will occur, and no new mitigation measures are required.

c) Interfere substantially with the movement of any native resident or migratory fish or marine wildlife species, or with established native resident or migratory wildlife corridors, or impede the use of native marine wildlife nursery sites?

The 800-foot outfall extension does not change the analysis and conclusion in the EIR (see p. 3.11-59). The exposure to increased contaminants will not pose any restriction or limitation on the movement of marine species. This finding is consistent with the impact determination in the EIR; no new significant impacts will occur, and no new mitigation measures are required.

d) Introduce or spread an invasive non-native species?

The 800-feet extension of the outfall does not change the analysis and conclusion in the EIR (see p. 3.11-58). Barges and utility vessels could spread invasive non-native marine species through ballast water and biofouling, posing a risk to marine habitats and marine biota, including special-status species, and therein pose a significant impact. Implementation of **Mitigation Measure MARINE-4** will minimize the potential contribution to the spread of invasive non-native species. This finding is consistent with the impact determination in the EIR; no new significant impacts will occur, and no new mitigation measures are required.

Mineral Resources

<i>Issues (and Supporting Information Sources):</i>	<i>Yes</i>	<i>No</i>
XII. MINERAL RESOURCES — Would the modifications, changed circumstances, or new information result in new significant impacts or substantially increase the severity of previously identified significant impacts that would::		
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☒
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☒

Discussion

a, b) Loss of Availability of Known or Locally-Important Mineral Resource **All Components**

As noted in the EIR Figure 3.12-1, Marina Park and its vicinity, including the Arundell Barranca concentrate pipeline alignment, is designated as MRZ-1, where adequate geologic information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence. The proposed Membrane Bioreactor will be located within an MRZ-3a designation, which is not protected under the mineral resource recovery zone. The modifications will not interfere with known or locally important mineral extraction. This finding is consistent with the impact determination in the EIR; no new significant impacts would occur, and no new mitigation measures are required.

Summary of Potential Effects on Mineral Resources

The proposed modifications will not result in substantial changes to mineral resources, cause new significant environmental effects, or result in a substantial increase in the severity of previously identified significant effects. In addition, there are no changes in circumstances under which the project is undertaken, or new information of substantial importance with respect to mineral resources that would potentially result in a significant new effect.

Noise

<i>Issues (and Supporting Information Sources):</i>		<i>Yes</i>	<i>No</i>
XIII. NOISE — Would the modifications, changed circumstances, or new information result in new significant impacts or substantially increase the severity of previously identified significant impacts that would::			
a)	Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒
b)	Generation of excessive groundborne vibration or groundborne noise levels?	☐	☒
c)	For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☒

Discussion

a) Noise

Concentrate Conveyance

The EIR evaluated open trench installation methods along Peninsula Street and Pierpont Boulevard. The project modification will eliminate direct noise impacts to this residential area. The conveyance alignment will instead be installed within Schooner Drive, Anchors Way, and Greenock Lane, approximately 25 feet from the nearest noise-sensitive receptors. During open trench construction, the existing sewer line to be replaced will be cut using pipe cutters, a process that will take a day. The modified alignment is adjacent to residential land uses on one side for approximately 3,000 linear feet, whereas the previously analyzed route was adjacent to residential land uses for 7,250 linear feet, with houses on both sides of the street for much of this distance. As a result, the modified alignment reduces overall impacts to residential land uses compared to the original alignment analyzed in the EIR. The installation of the pipeline would take approximately 1 to 2 days adjacent to anyone property. Construction methods will be similar to methods analyzed in the EIR (see p. 3.13-8), including open trench and HDD (see p. 3.13-23).

HDD drilling will be used for the concentrate conveyance pipeline under the harbor, and once again several months later for the ocean outfall. The HDD process will require 24-hour operations once the pipe pullback begins (approximately 2 to 3 days) because the operation must be continuous until it is complete in order to avoid a potential collapse in the previously bored hole. As the EIR discussed (see p. 3.13-23), the HDD operations will result in noise levels up to 79 dBA at 50 feet (see Table 3.13-12 of the EIR). At the closest sensitive receptor, a residence approximately 220 feet away, the noise level would be approximately 66 dBA. The two HDD drilling process will therefore exceed City nighttime noise standards of 45 dBA. Implementation of **Mitigation Measures NOISE-1, NOISE-2, NOISE-3, and NOISE-4** will lessen the impacts of construction. Effective

noise barriers, generator housings, and mufflers could reduce noise levels by up to a combined 16 dBA and reducing outfall construction noise levels to 53 dBA.

The EIR estimated that 24-hour operations could be necessary for several weeks for the ocean outfall (see p. 3.13-25). However, the EIR overestimated the duration of 24 hour operations, which will only be needed to pull the pipeline into the borehole. Once this pullback begins, it must continue until it is completed, which will take approximately 2 to 3 days. Twenty-four hour operations will occur twice: once for the concentrate conveyance pipeline under the harbor, and once again for the ocean outfall. The total duration of 24-hour construction activity (approximately 4 to 6 days total) will be less than the several weeks' duration estimated in the EIR. Therefore, there is no new significant impact or substantial increase in a previously-evaluated impact.

As discussed in Section 3.13 of the EIR, implementation of Mitigation Measures NOISE-1 and NOISE-2 will lessen construction noise for open trench activities and ensure that impacts at sensitive receptors will be minimized. Once installed, the underground pipeline will have no noise impacts to surrounding land uses. As such, maintenance and inspection activities will not substantially increase ambient noise levels above those noise levels existing without the project. This finding is consistent with the impact determination in the EIR; no new significant impacts will occur, and no new mitigation measures are required.

Ocean Outfall Design Updates

The extended outfall does not modify the construction methods analyzed in the EIR (see p. 2-48), which concluded that temporary construction noise will result in a significant and unavoidable impact of the project. There are no sensitive receptors within the immediate vicinity of the work area at Harbor Cove Beach. The modifications do not increase the anticipated duration of drilling activities, or overall construction duration. Implementation of Mitigation Measures NOISE-1, NOISE-2, NOISE-3, and NOISE-4 will lessen the impacts of construction. Effective noise barriers, generator housings, and mufflers could reduce noise levels by up to a combined 16 dBA and reduce outfall construction noise levels to 69 dBA. However, since noise levels are still greater than 45 dBA during nighttime hours, the impact is significant and unavoidable. This finding is consistent with the impact determination in the EIR; no new significant impacts would occur, and no new mitigation measures are required.

Ocean Outfall Pipe Assembly Process

Assembly of the pipeline will occur within Marina Park, within 50 feet of local residences. The assembly area will be closer to these residences to the east than assumed in the Final EIR. Construction activities will include unloading and staging of pipeline segments and pipeline fusing, which will generate noise from vehicles and the assembly process. The fusing process includes having the pipe segments heated up by a heating element and hydraulically squeezing the pipes together. Once the pipes are fused they need time to cool and cure. This process produces a minimal amount of noise.

No nighttime assembly activities will be required in Marina Park. To minimize the noise impact to residents and businesses, the workday will generally run from 7:00am to 5:00pm. However, temporary noise impacts associated with the HDD pullback will remain significant and unavoidable, as discussed above. Once the pipeline segments are floated out to the ocean and installed on the ocean floor, the Marina Park will be returned to its pre-construction condition.

Implementation of Mitigation Measures NOISE-1, NOISE-2, NOISE-3, and NOISE-4 will lessen the impacts of the temporary assembly activities. Mitigation measure NOISE-2 requires the designation of a Noise Disturbance Coordinator and a 24-hour hotline for local residences to communicate directly with the construction managers. The City will minimize noise impacts to the extent feasible and maintain close coordination with affected residences. This conclusions regarding noise impacts are consistent with the impact determination in the EIR; no new significant impacts will occur, and no new mitigation measures are required.

Membrane Bioreactor Treatment Process

Construction of the Membrane Bioreactor will generate noise similar to the construction activities evaluated in the Final EIR for construction of the AWPf. Construction activities will include demolition, excavation, and construction of concrete foundations and structures. The nearest noise-sensitive receptors are commercial buildings located approximately 100 feet north of the Membrane Bioreactor construction. There are no residential land uses within a half mile of the VWRF. Noise generated by construction activities would not exceed significance thresholds referenced in Section 3.13 of the Final EIR. Construction would mainly occur Monday through Friday, between the hours of 7:00 a.m. and 8:00 p.m. and is therefore consistent with City noise standards.

The operational noise from the Membrane Bioreactor would not differ from the existing noise occurring at the VWRF. This finding is consistent with the impact determination in the Final EIR; no new significant impacts will occur, and no new mitigation measures are required.

b) Vibration

All Modifications

Neighboring land uses near the construction sites could be exposed to some degree of ground borne vibration related to construction activities. Although some vibration may be experienced locally, vibration-related impacts from the construction of the outfall, conveyance pipeline, and Membrane Bioreactor would be similar to the analysis within the EIR (see p. 3.13-28).

c) Proximity to Airstrip

All Modifications

The project site is not located within an airport land use plan, within two miles of a public use airport, or within the vicinity of a private airstrip. The nearest airport is the Oxnard Airport, located approximately 5 miles southeast of the project site. Therefore, construction or operation of the project will not expose workers or visitors to excessive airport related noise levels. No impacts will occur. The modifications do not alter the impact analysis within the EIR.

Summary of Potential Effects on Noise

The proposed modifications will not result in substantial changes to noise, cause new significant environmental effects, or result in a substantial increase in the severity of previously identified significant effects. In addition, there are no changes in circumstances under which the project is undertaken, or new information of substantial importance with respect to noise that would potentially result in a significant new effect.

Population and Housing

Issues (and Supporting Information Sources):	Yes	No
XIV. POPULATION AND HOUSING — Would the modifications, changed circumstances, or new information result in new significant impacts or substantially increase the severity of previously identified significant impacts that would::		
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☒
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☒

Discussion

a) Induce Growth, Displace People

All Modifications

The proposed modifications will not induce growth or displace people. The ocean outfall will be sized to comply with NPDES discharge permit requirements. No houses will be removed. This finding is consistent with the impact determination in the EIR; no new significant impacts will occur, and no new mitigation measures are required

Summary of Potential Effects on Population and Housing

The proposed modifications will not result in substantial changes to population and housing, cause new significant environmental effects, or result in a substantial increase in the severity of previously identified significant effects. In addition, there are no changes in circumstances under which the project is undertaken, or new information of substantial importance with respect to population and housing that would potentially result in a significant new effect.

Public Services

<i>Issues (and Supporting Information Sources):</i>	<i>Yes</i>	<i>No</i>
XV. PUBLIC SERVICES — Would the modifications, changed circumstances, or new information result in new significant impacts or substantially increase the severity of previously identified significant impacts that would:		
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services:		
i) Fire protection?	☐	☒
ii) Police protection?	☐	☒
iii) Schools?	☐	☒
iv) Parks?	☐	☒
v) Other public facilities?	☐	☒

Discussion

a.i-v) Public Services

All Modifications

The modifications do not create the need to expand or to construct any new fire departments, police stations, schools, parks or other public facilities such as libraries or hospitals. The modifications will not significantly increase the need for public services and will not induce substantial population growth in the county or cities that would require expanded public services. This finding is consistent with the impact determination in the EIR; no new significant impacts will occur, and no new mitigation measures are required.

Summary of Potential Effects on Public Services

The proposed modifications will not result in substantial changes to public services, cause new significant environmental effects, or result in a substantial increase in the severity of previously

identified significant effects. In addition, there are no changes in circumstances under which the project is undertaken, or new information of substantial importance with respect to public services that would potentially result in a significant new effect.

Recreation

<i>Issues (and Supporting Information Sources):</i>	<i>Yes</i>	<i>No</i>
XVI. RECREATION — Would the modifications, changed circumstances, or new information result in new significant impacts or substantially increase the severity of previously identified significant impacts that would:		
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☒
b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☒

Discussion

a, b) Increased Use or New Recreational Facilities

All Modifications

The modifications will not result in increased use or demand for recreational facilities. Assembly of the pipeline within Marina Park would temporarily close the northern portion of the park and parking lot to recreational uses. Once construction is completed, the park will be returned to its pre-construction conditions. Two at-grade vault covers will be installed within the park. Otherwise no aboveground facilities will be required.

The diffuser will be constructed on an upland area of Harbor Cove Beach. Only the diffuser will be assembled in this location at Harbor Cove Beach. The HDD and seafloor segments will still be constructed at and launched from Marina Park. The work area has historically been used as a storage and staging area for the annual dredging operation for the harbor and is not used for recreational activities. The site is owned by the Port District and the land use designation is commerce and the site is zoned harbor commercial. The construction activities would require a small portion of the beach to be closed for one to two days when the diffuser is being pulled down the beach and in to the ocean. Once the diffuser is offshore, the beach will be reopened to the public. As a result, the modifications does not alter the impact analysis within the EIR.

Summary of Potential Effects on Recreation

The proposed modifications will not result in substantial changes to recreation, cause new significant environmental effects, or result in a substantial increase in the severity of previously identified significant effects. In addition, there are no changes in circumstances under which the

project is undertaken, or new information of substantial importance with respect to recreation that would potentially result in a significant new effect.

Transportation

<i>Issues (and Supporting Information Sources):</i>	<i>Yes</i>	<i>No</i>
XVII. TRANSPORTATION — Would the modifications, changed circumstances, or new information result in new significant impacts or substantially increase the severity of previously identified significant impacts that would:		
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☒
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☒
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☒
d) Result in inadequate emergency access?	☐	☒

Discussion

a, b, c, d) Plan Consistency, VMT, Increase in Hazards, Emergency Access

Concentrate Conveyance

Construction truck and vehicle trips will be generated primarily by construction workers commuting to and from the work sites, and by trucks hauling materials and equipment to and from the pipeline alignments. The modifications do not change construction methods but would generate fewer trips in comparison to what was estimated in the EIR since the modification would require less construction within the roadways (approximately 1.5-miles less).

During HDD construction for the conveyance pipeline, one-way traffic is proposed on Anchors Way Drive, to allow the pipeline casing and pipelines to be assembled in the other traffic lane. The proposed traffic pattern will be to route vehicles from Schooner Drive to Beachmont Street. Exiting from the Port District offices would be accessed from via Beachmont Street. Additionally, Anchors Way Drive will be temporarily closed in both directions for approximately two days during the pulling of the pipeline casing and pipelines. Access to the Port District will still be available from be via Beachmont Street during that time. However, the boat storage yard adjacent to the Port District Building will not have any access during this two-day period. Access to Ventura Marina Mobile Home Park Community will not be impacted during the HDD operations. Access to Ventura Marina Mobile Home Park Community will not be impacted during the HDD operations.

In order to reduce delay times due to construction activities, the City of Ventura will be required to implement Mitigation Measure TRAF-1, requiring the preparation and

implementation of a Traffic Control Plan (see p. 3.17-15). Implementation of Mitigation Measure TRAF-1 will ensure that impacts to the local and regional circulation systems during construction of the conveyance facilities are reduced to less than significant levels by notifying the surrounding area of the closure and the duration of the closure and posting signage prior to closing a segment of the roadway during the HDD process. Implementation of TRAF-1 will ensure that hazards are minimized and emergency access is maintained at all times. This finding is consistent with the impact determination in the EIR; no new significant impacts will occur, and no new mitigation measures are required.

Once constructed, all conveyance pipelines will be entirely underground, will require minimal maintenance, and will not result in a significant increase in traffic volumes on surrounding roadways. Thus, operation of the water conveyance system will not affect the performance of the local or regional circulation systems and impacts will be less than significant. This finding is consistent with the impact determination in the EIR; no new significant impacts will occur, and no new mitigation measures are required.

The HDD process for constructing the pipeline under the Arundell Barranca harbor will require the temporary closure of Marina Park. However, this will occur during the same period of time that the park was anticipated to be closed as analyzed in the EIR. The temporary park closure will not affect emergency access to the neighboring land uses or beach. The Traffic Control Plan will be coordinated with emergency responders, which include the fire department, police department, and ambulance first responders that have jurisdiction within the vicinity of the projects and will ensure access to the park in case of an emergency. Once complete, the park will return to pre-construction conditions. This finding is consistent with the impact determination in the EIR; no new significant impacts will occur, and no new mitigation measures are required.

Ocean Outfall Design Updates

The ocean outfall extension will not affect transportation, and will not increase traffic hazards or emergency access. Construction of the diffuser within the work area at Harbor Cove Beach would last for approximately 20 days. The outfall design upgrades would not extend the duration of construction activities estimated in the EIR. The modifications will not alter the impact analysis within the EIR.

Ocean Outfall Pipe Assembly Process

Assembly of the pipeline within Marina Park will temporarily close the park to the public similar to the what was anticipated as part of the analysis in the EIR. The EIR estimates that the construction of the outfall would occur over a two-year period (DEIR, p. 2-50). The pipeline assembly will not extend this timeline. Furthermore, the temporary park closure would not affect emergency access to the neighboring land uses or beach. The Traffic Control Plan will be coordinated with emergency responders, which include the fire department, police department, and ambulance first responders that have jurisdiction within the vicinity of the projects and will ensure access to the park in case of an emergency. Once complete, the park will return to pre-construction conditions. This

finding is consistent with the impact determination in the EIR; no new significant impacts will occur, and no new mitigation measures are required.

Once the pipe segments are conjoined, they will be floated into the harbor channel and pulled by a tugboat through the harbor mouth to the marine construction area. This activity will likely require the temporary closure of the harbor while the pipeline is being pulled out to the ocean. The contractor would be required to coordinate all activities with the Port District, including providing ample notices of the closure to the public and other port users. Since this closure would be short lived, less than two days, it would not result in a significant impact.

Membrane Bioreactor Treatment Process

The proposed Membrane Bioreactor will replace the secondary and tertiary facilities within the existing VWRf. Construction of the Membrane Bioreactor will require between 10 to 30 daily worker trips depending the construction phase and a total of up to 60 truck trips per day during peak construction days for approximately a year while the Membrane Bioreactor building is being constructed. While this represents a slight increase trips compared with the VWRf Upgrades identified in the EIR (DEIR, Table 2-6), it does not result in an inconsistency with plans and policies. While construction of the Membrane Bioreactor will temporarily generate additional truck and vehicle trips within Ventura and the regional circulation system, traffic levels will not substantially increase and will return to pre-construction conditions once construction is complete. Additionally, while local drivers could experience increased travel times if they travel behind a heavy truck due to slower movement and turning radii compared to passenger vehicles, these delays will be intermittent throughout the day and will cease once construction activities are completed. No hazards will be created and emergency access will not be affected by construction at the VWRf. Impacts to the existing performance of the surrounding circulation system during construction of the AWPf treatment upgrades would be less than significant.

Once constructed, the Membrane Bioreactors will add approximately 5 trips per day to the treatment facility. These worker and delivery trips will be generated within the Ventura area. The number of vehicle and truck trips generated during operation would be minimal and would not cause existing roadway levels of operation to decrease, similar to the EIR (see p. 3.17-13) Further, *CEQA Guidelines* Section 15064.3 suggests that the analysis of VMT impacts applies mainly to land use and transportation projects. Furthermore, projects that generate or attract fewer than 110 operational trips per day would generally be exempt from further consideration with respect to VMT and impacts are assumed to be less than significant. Per this guidance, since the project improvements are neither a traffic generating land use nor a transportation project, and will generate very few operational trips, these project improvements can be assumed to have a less-than-significant impact with respect to VMT. This finding is consistent with the impact determination in the EIR; no new significant impacts will occur, and no new mitigation measures are required.

Summary of Potential Effects on Transportation

The proposed modifications will not result in substantial changes transportation, cause new significant environmental effects, or result in a substantial increase in the severity of previously identified significant effects. In addition, there are no changes in circumstances under which the project is undertaken, or new information of substantial importance with respect to transportation that would potentially result in a significant new effect.

References

Ventura County Public Works (VCPW), 2022. Vehicle Miles Traveled-Legislative Version. Available at: <https://s29422.pcdn.co/wp-content/uploads/2020/06/Draft-VMT-for-Public-Review-Legislative-Version.pdf>, Accessed on May 5, 2022.

Tribal Cultural Resources

<i>Issues (and Supporting Information Sources):</i>	<i>Yes</i>	<i>No</i>
XVIII. TRIBAL CULTURAL RESOURCES — Would the modifications, changed circumstances, or new information result in new significant impacts or substantially increase the severity of previously identified significant impacts that would:		
a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:		
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or	☐	☒
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒

Discussion

a.i-ii) Tribal Cultural Resources

Concentrate Conveyance and Membrane Bioreactor Treatment Process

The conveyance alignment will be within the updated APE analyzed in the Cultural Resources Report. No tribal cultural resources have been identified within the project area. Therefore, ground disturbing activities associated with the construction of the

conveyance pipeline, including open trenching and HDD methods, will not cause a substantial adverse change in the significance of a tribal cultural resource. This finding is consistent with the impact determination in the EIR; no new significant impacts will occur, and no new mitigation measures are required.

Ocean Outfall Design Updates and Ocean Outfall Pipe Assembly Process

No tribal cultural resources have been identified within the project area. The pipeline assembly will not involve ground-disturbing activities. The outfall extension would be located within the APE analyzed in the Cultural Resources Report. This finding is consistent with the impact determination in the EIR; no new significant impacts would occur, and no new mitigation measures are required.

Summary of Potential Effects on Tribal Cultural Resources

The proposed modifications will not result in substantial changes to tribal cultural resources, cause new significant environmental effects, or result in a substantial increase in the severity of previously identified significant effects. In addition, there are no changes in circumstances under which the project is undertaken, or new information of substantial importance with respect to tribal cultural resources that would potentially result in a significant new effect.

Utilities and Service Systems

<i>Issues (and Supporting Information Sources):</i>		<i>Yes</i>	<i>No</i>
XIX. UTILITIES AND SERVICE SYSTEMS — Would the modifications, changed circumstances, or new information result in new significant impacts or substantially increase the severity of previously identified significant impacts that would::			
a)	Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☒
b)	Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☒
c)	Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☒
d)	Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☒
e)	Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☒

Discussion

a, b, c, d, e) Relocation of Utilities, Wastewater Expansion, Water Supplies, Solid Waste, Waste Reduction

All Modifications

The proposed project provides new water supplies through upgrading an existing wastewater treatment facility. The proposed project would assist Ventura Water in meeting projected water demands for its service area through advance treatment of tertiary flows from the VWRf. The proposed project components would not generate additional water or wastewater requiring additional facilities or expansion of existing facilities. The implementation of the project modifications would not change any of the analyses prepared in the Utilities, Service Systems, and Energy Section of the EIR. The proposed modifications will not require or result in relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electrical power, natural gas, or telecommunication facilities beyond what was analyzed in the EIR. Once constructed the project components will not generate solid waste while in operation. Therefore, there will be no impact related to landfill capacity. This finding is consistent with the impact determination in the EIR; no new significant impacts will occur, and no new mitigation measures are required.

Summary of Potential Effects on Utilities and Service Systems

The proposed modifications will not result in substantial changes to utilities and service systems other than in accordance with project objectives, cause new significant environmental effects, or result in a substantial increase in the severity of previously identified significant effects. In addition, there are no changes in circumstances under which the project is undertaken, or new information of substantial importance with respect to utilities and service systems that would potentially result in a significant new effect.

References

Los Angeles County Sanitation District (LACSD), 2022. Toland Road Landfill (56-AA-0005) Fact Sheet. Available online at:
<https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/606?siteID=3952>,
Accessed on April 28, 2022.

Wildfire

<i>Issues (and Supporting Information Sources):</i>		<i>Yes</i>	<i>No</i>
XX. WILDFIRE — Would the modifications, changed circumstances, or new information result in new significant impacts or substantially increase the severity of previously identified significant impacts that would::			
a)	Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☒
b)	Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☒
c)	Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☒
d)	Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☒

Discussion

a-d.) All Modifications

The project site is located in an urbanized area adjacent to the coast. The proposed project is not included within or near an area designated as a State Responsibility Area and is not located in an area classified as a Very High Fire Hazard Severity Zone according to the map prepared by CAL FIRE (CAL FIRE 2022). In addition, the County of Ventura Fire Hazard Severity Zones map indicates that the project site is not located within a very high fire zone (CAL FIRE 2007). Therefore, since the project site is not located in or near a state responsibility area or lands classified as very high fire hazard severity zones, no impacts related to wildfire would occur. The modifications will not alter the impact analysis within the EIR.

Summary of Potential Effects on Wildfire

The proposed modifications will not result in substantial changes to wildfire, cause new significant environmental effects, or result in a substantial increase in the severity of previously identified significant effects. In addition, there are no changes in circumstances under which the project is undertaken, or new information of substantial importance with respect to wildfire that would potentially result in a significant new effect.

References

California Department of Forestry and Fire Protection (CAL FIRE), 2022. Fire Hazard Severity Zone Viewer. Available at: <https://egis.fire.ca.gov/FHSZ/>. Accessed April 25, 2022.

Summary

As described in this Addendum, impacts to the environment as a result of the project modifications will not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects. No new information of substantial importance indicates the project as modified will have one or more significant effects not discussed in the previous EIR, nor are significant effects previously examined substantially more severe than described in the previous EIR. No new mitigation will be required as a result of implementing the project modifications. Pursuant to *CEQA Guidelines* Sections 15162 and 15164 and the project modification findings described herein, the proposed modifications to the project do not require preparation of a Subsequent or Supplemental EIR.