



Addendum No. 2 to Environmental Impact Report

Carpinteria Advanced Purification Project

CAPP

Replenishing Our Groundwater for the Future

State Clearinghouse #2019011016

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November 2025

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Acronyms

AFY	Acre-feet per year
AHPA	Archaeological and Historic Preservation Act
AOP	Advanced oxidation process
APE	Area of Potential Effect
AWPF	Advanced Water Purification Facility
bgs	below ground surface
BMP	Best management practice
Caltrans	California Department of Transportation
CAPP	Carpinteria Advanced Purification Project
CARB	California Air Resources Board
CCR	California Code of Regulations
CEQA	California Environmental Quality Act
CSD	Carpinteria Sanitary District
CVWD	Carpinteria Valley Water District
EIR	Environmental Impact Report
ESHA	Environmentally Sensitive Habitat Area
FESA	Federal Endangered Species Act
FWCA	Fish and Wildlife Coordination Act
HMBP	Hazardous Materials Business Plan
LF	Linear feet
MBTA	Migratory Bird Treaty Act
MF	microfiltration
MGD	million gallons per day
MMRP	Mitigation Monitoring and Reporting Program
MS4	Municipal Separate Storm System
MTD	Metropolitan Transit District
NHPA	National Historic Preservation Act
NPDES	National Pollutant Discharge Elimination System
O&M	Operations and maintenance
PWPS	Purified water pump station

ROW	right-of-way
SBCAPCD	Santa Barbara County Air Pollution Control District
SCH	State Clearinghouse
SWPPP	Stormwater Pollution Prevention Plan
TPZ	Tree protection zone
UF	ultrafiltration
USFWS	U.S. Fish and Wildlife Service
WWTP	Wastewater Treatment Plant

1. INTRODUCTION

This document is Addendum No. 2 to the Carpinteria Advanced Purification Project Environmental Impact Report (State Clearinghouse [SCH] No. 2019011016), referred to hereafter as the “EIR”. This Addendum to the EIR has been prepared pursuant to the California Environmental Quality Act (CEQA), Public Resources Code Section 15164.

1.1 Background

On December 11, 2019 Carpinteria Valley Water District (CVWD) certified the EIR and Mitigation Monitoring and Reporting Program (MMRP) for the Carpinteria Advanced Purification Project. In September 2023, as part of final design activities, CVWD determined the need to include changes to the project. Addendum No. 1 to the EIR was developed to address those proposed changes and approved in November 2024. The project as described in the EIR and modified in Addendum No. 1 is the “Approved Project”. Based on input from neighbors following approval of Addendum No. 1, and recommended modifications at the treatment facility site during permit discussions, CVWD determined additional project changes warranted preparation of a second Addendum. This Addendum No. 2 discusses the changes to the Approved Project, and to what extent those changes affect the potential environmental impacts.

1.1.1 Approved Project

The EIR analyzed the environmental impacts of the construction and operation of an advanced water purification facility (AWPF), injection wells, monitoring wells, and conveyance pipelines in the City of Carpinteria and unincorporated Santa Barbara County, shown in **Figure 1-1**. Note that Injection Well Site #5 shown in the figure was removed from the Approved Project during the EIR process and is not included in the Approved Project. The Addendum No. 1 added additional locations for injection wells (roadway right-of-way along Meadow View Lane and Linden Avenue), modified structures at the AWPF site, and expanded the location of monitoring wells. The changes included in Addendum No. 1 are shown in **Figure 1-2**.

The majority of the Approved Project is located in the City of Carpinteria, with one of the injection well sites identified in the EIR located in unincorporated Santa Barbara County (Well Site #6). The Approved Project footprint includes:

- The AWPF site at 5355 Sixth Street (co-located with the Carpinteria Sanitary District’s [CSD] Wastewater Treatment Plant [WWTP] site located 5351 Sixth Street),
- An up-to-40-foot-wide corridor for the conveyance pipelines,
- 10,000 square feet at each of up to two selected injection well sites, located between 0.8 and 1.0 miles north of the AWPF,
- 5,000 square feet at each of up to three monitoring well cluster locations,

- And the immediate area around the existing ocean outfall (work on the outfall was completed separately from the project due to emergency regulations but remains part of the Approved Project).

The injection well sites would be located approximately 0.8 to 1.0 miles north of the AWPf. The EIR identified five potential injection well sites, though only three injection wells would be constructed. Addendum No. 1 expanded the potential locations for the injection wells to include the roadway right-of-way (ROW) along Linden Avenue, adjacent to Well Site #3 and the roadway ROW along Meadow View Lane, adjacent to Well Site #4.

Conveyance pipelines between the AWPf and the injection wells would generally run within the public roadway ROW or existing CVWD easements. The pipeline would cross U.S. Highway 101 at the Linden Street Overpass in a pipeline casing installed by Caltrans as part of a separate project. The Approved Project is roughly bounded to the east by Carpinteria Creek, the south by the Pacific Ocean, the west by Sterling Avenue, and the north by Foothill Road/Highway 192. When completed, the Approved Project would produce approximately 1,100 acre-feet per year (AFY) of purified water from the CSD WWTP for injection into the local groundwater basin. This water would ultimately be used for CVWD potable water supply, and existing CVWD production wells would be used to recover treated water from the groundwater basin.

Figure 1-1: Approved Project Evaluated in EIR

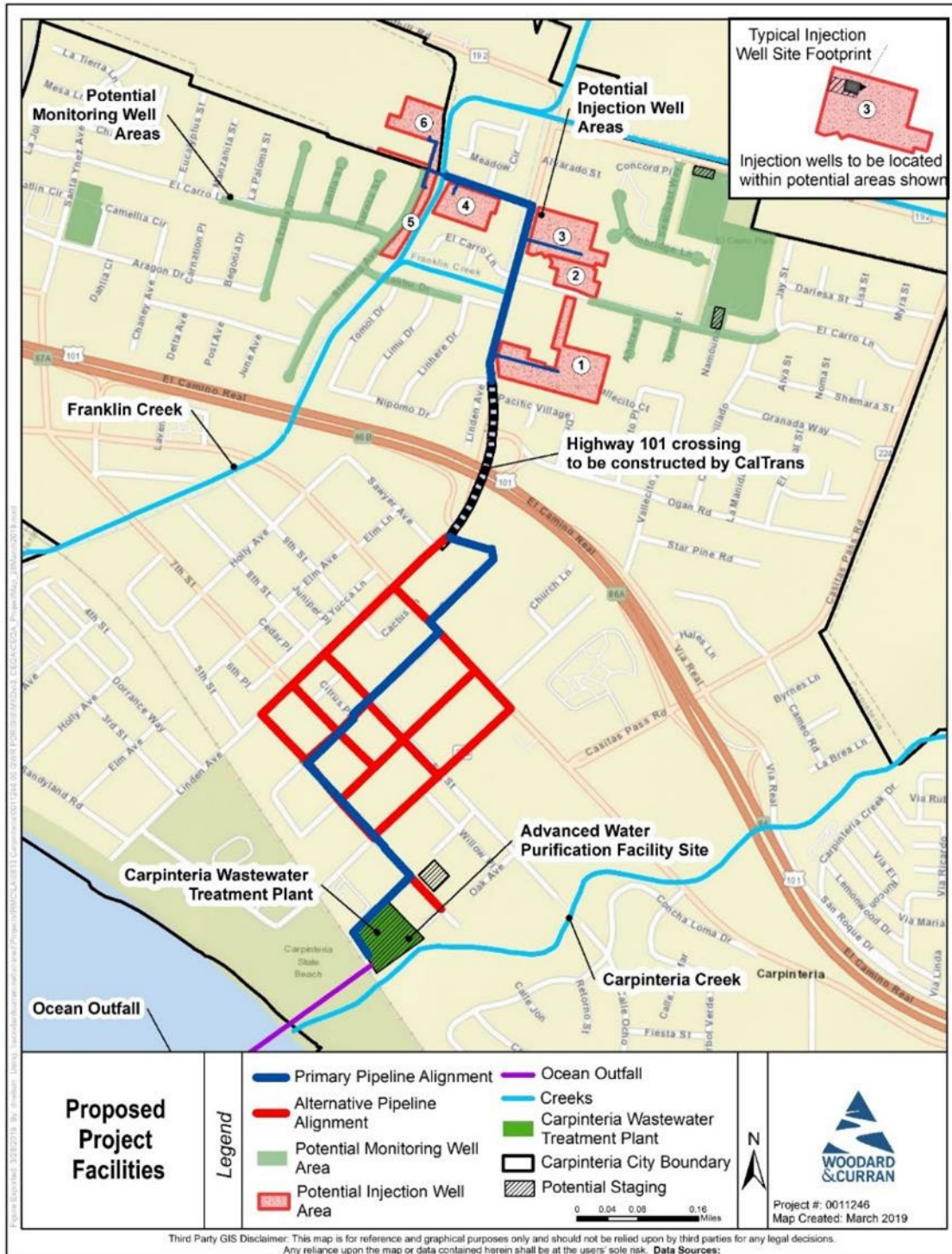
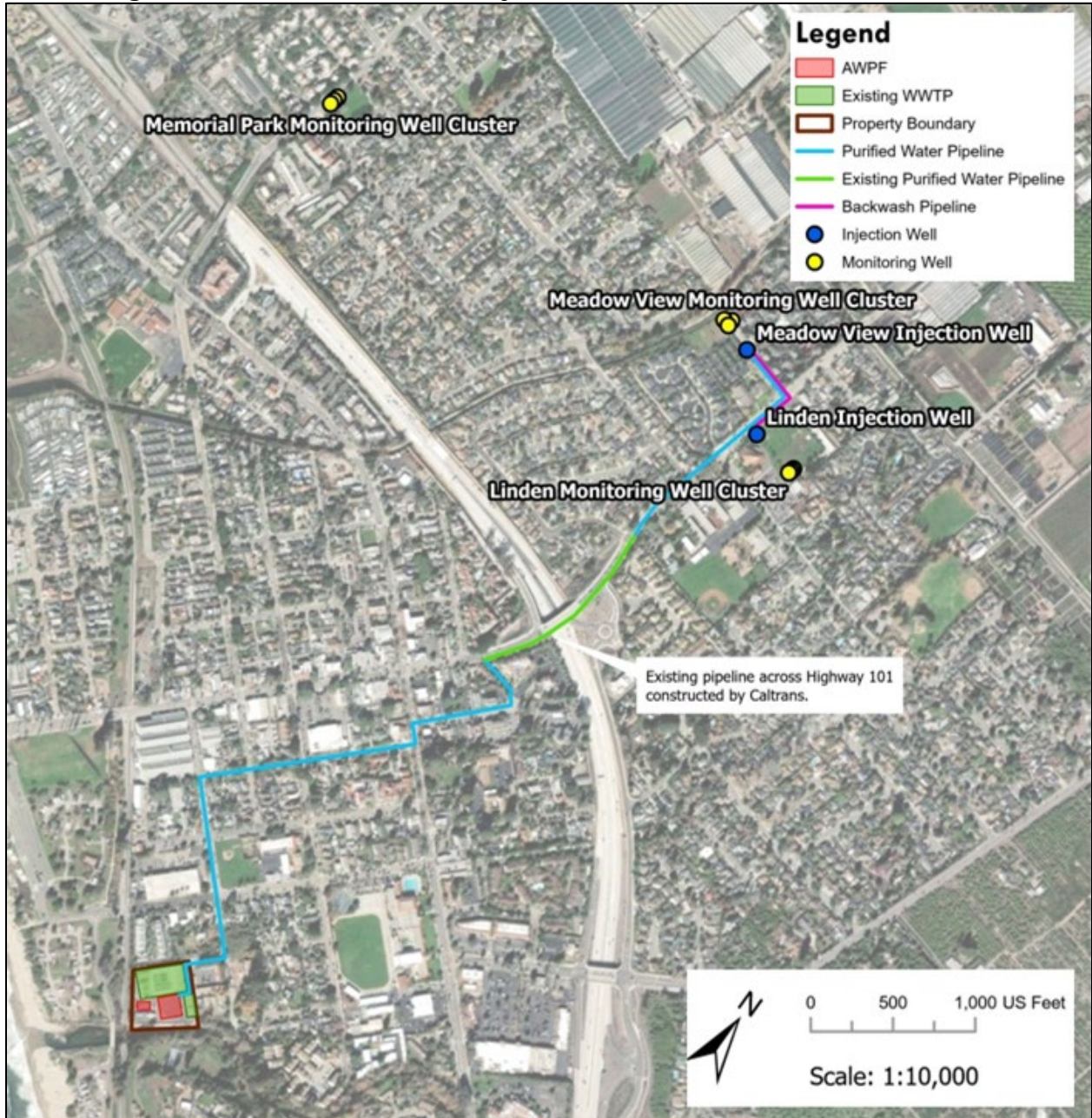


Figure 1-2: Modification to Project as Evaluated in Addendum No. 1



The Approved Project's facilities, as shown in Figure 1-1 and modified in Figure 1-2, consist of:

- Advanced Water Purification Facility consisting of below grade equalization tank, below grade waste tank, UF, RO, and AOP systems, to be located on the WWTP site
- Purified Water Pump Station (PWPS) and 10,000-gallon below grade clearwell, to be located on the WWTP site
- 6,100 linear feet (LF) of 10-inch conveyance pipeline from the PWPS to a well lateral split point, including Caltrans installation for the Linden Avenue overpass over U.S. Highway 101
- 1,000 LF of 8-inch conveyance pipeline from the well lateral split point to two individual injection wells
- Up to two 14-inch diameter injection wells with backwash pumps
- 600 LF of 12-inch pipe and 400 LF of gravity-fed 48-inch pipe to the sanitary sewer to existing sanitary sewers; including associated sewer manholes and air-gap discharge to sewer near wellheads
- Up to three monitoring well clusters

Modifications to the ocean outfall that were included in the EIR have already been completed in a manner consistent with the EIR. One monitoring well cluster (El Carro monitoring wells) was completed as a separate project and was addressed via an MND, because it is part of the Carpinteria Groundwater Sustainability Agency's groundwater monitoring program and not specific to the Approved Project. For these reasons, neither the ocean outfall modifications nor the El Carro monitoring wells are part of the Approved Project. Additionally, the Approved Project no longer includes the Franklin Creek crossing that was evaluated in the EIR.

1.1.2 Proposed Modified Project

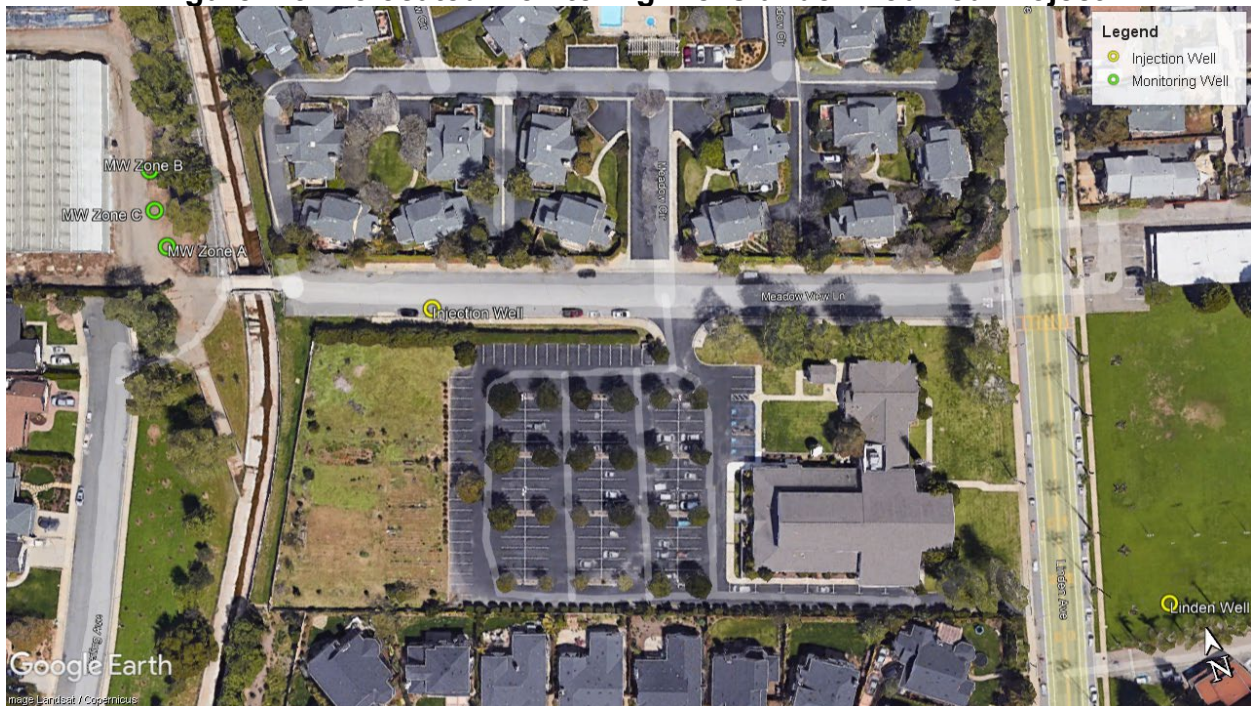
The following are summaries of new project elements that modify the Approved Project. These modified elements, together with the Approved Project, constitute the "Modified Project." A detailed listing of the new elements can be found in *Section 2 Project Description*.

Addendum No. 2 addresses a change in the proposed location of the monitoring well cluster from Meadow View Lane to Well Site #6 (see **Figure 1-3**). Well Site #6 is located west of Franklin Creek and north of Meadow View Lane and is currently used for agricultural purposes. Well Site #6 was included in the Approved Project as a proposed injection well location. While the EIR evaluated the potential environmental effects associated with construction and operation of injection wells at Well Site #6, Well Site #6 was not identified as a potential monitoring well location. Therefore, the EIR did not specifically analyze the potential for effects from monitoring wells at that location. However, the EIR did include analysis of monitoring wells at other locations. Because

monitoring wells are generally smaller than injection wells they would generally have similar or less potential for impact than injection wells. Mitigation Measure MM 3.10-4, as identified in the certified EIR, remains applicable and would be implemented to reduce potential effects related to contaminated sites and subsurface disturbance to less-than-significant levels. Therefore, Well Site #6's inclusion as the proposed location for monitoring wells under Addendum 2 does not represent a new or substantially different project component that would result in new or more severe environmental effects.

The relocation of the monitoring well cluster is necessary to meet the separation requirements between injection wells and monitoring wells because the injection well in the Meadow View Land ROW was relocated approximately 120 feet closer to Franklin Creek than previously considered. The minor change in injection well location within Meadow View Lane is within the ROW approved for injection well use in the Approved Project and does not represent a change to the Approved Project.

Figure 1-3: Relocated Monitoring Wells under Modified Project



Another modification to the Approved Project includes the extension of the flood wall surrounding the AWPf site and installation of a passive flood barrier at the entrance to the CSD site. The existing transformers are located approximately 22 feet outside of the current flood wall and facility footprint. To provide adequate flood protection for this equipment, the flood wall would be extended 25 feet outward (west) and 75 feet south along the rear portion of the facility to fully enclose the transformers within the walled portion of the site. At the entrance to the site, a flood barrier would be installed that would rise during high water events, fully enclosing the AWPf site. When no water is present, the barrier would stay belowground and not impede traffic flows in and out of the site or

interfere with the gate. The extended flood wall and new flood barrier are shown in **Figure 1-4**, while a diagram of the flood barrier is shown in **Figure 1-5**.

Figure 1-4: Modified Project Map of Flood Wall Extension

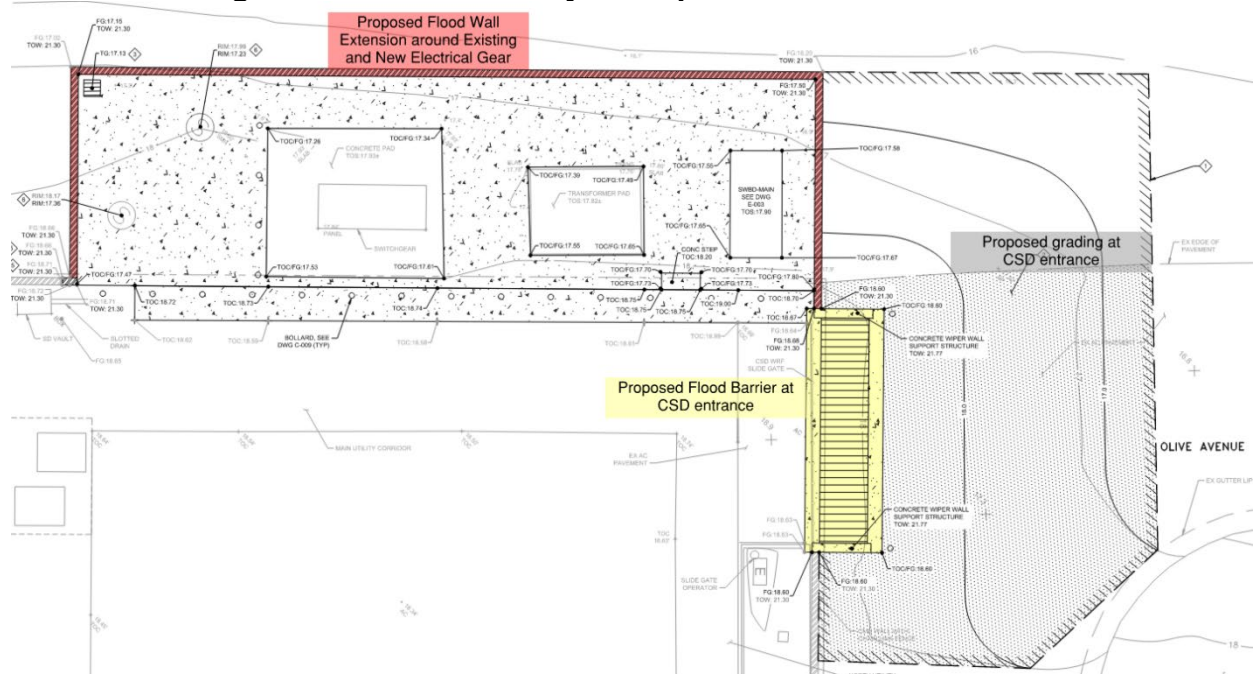
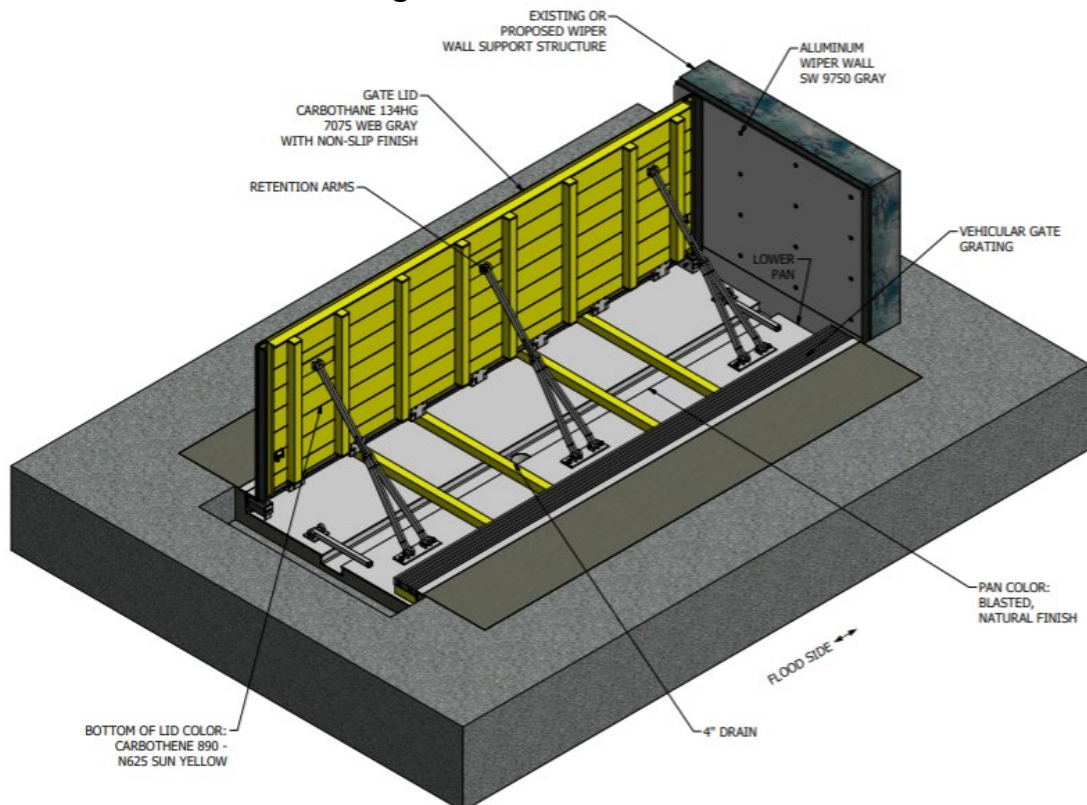


Figure 1-5: Flood Barrier



1.2 Purpose of Addendum

Addendum No. 2 addresses potential environmental effects of the construction and operation of the Modified Project. The Draft EIR, Final EIR, Addendum No. 1 and Addendum No. 2, together with the other documents incorporated by reference herein, serve as the environmental review of the Carpinteria Advanced Purification Project (Modified Project), as required pursuant to the provisions of CEQA, the CEQA guidelines, 14 California Code of Regulations (CCR) Section 15164 et seq. The environmental analysis in this Addendum and all feasible mitigation measures identified in the EIR would be incorporated into the resolutions approving the Modified Project.

1.3 Basis for Addendum

Section 15164 of the CEQA Guidelines states: “The lead agency or a responsible agency shall prepare an addendum to a previously certified EIR 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.” Pursuant to Section 15162 of the CEQA Guidelines, no subsequent EIR may be required for the project unless the lead agency determines, on the basis of substantial evidence, that one or more of the following conditions are met:

- A. When an EIR has been certified or a negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:
 - (1) Substantial changes are proposed in the project which would 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;
 - (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which would 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
 - (3) 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:
 - (a) The project would have one or more significant effects not discussed in the previous EIR or negative declaration;
 - (b) Significant effects previously examined would be substantially more severe than shown in the previous EIR;

- (c) 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
 - (d) 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.
- B. If changes to a project or its circumstances occur or new information becomes available after adoption of a negative declaration, the lead agency shall prepare a subsequent EIR if required under subdivision a). Otherwise the lead agency shall determine whether to prepare a subsequent negative declaration, an addendum, or no further documentation.
- C. Once a project has been approved, the lead agency's role in project approval is completed, unless further discretionary approval on that project is required. Information appearing after an approval does not require reopening of that approval. If after the project is approved, any of the conditions described in subdivision a) occurs, a subsequent EIR or negative declaration shall only be prepared by the public agency which grants the next discretionary approval for the project until the subsequent EIR has been certified or subsequent negative declaration adopted.

CVWD has assessed the proposed project modifications in light of the requirements defined under Section 15162 of the CEQA Guidelines. As discussed in this Addendum, none of the conditions requiring preparation of a subsequent EIR under Section 15162 of the CEQA Guidelines are satisfied.

1.4 Evaluation of Environmental Impacts

This Addendum uses the Environmental Checklist questions, pursuant to Section 15063(d)(3) of the CEQA guidelines, to compare the anticipated environmental effects of the proposed Modified Project with those disclosed in the EIR, and reviews whether any of the conditions requiring preparation of a Subsequent EIR pursuant to Section 15162 of the CEQA Guidelines are met, and whether there are new significant impacts resulting from the proposed Modified Project. The Environmental Checklist questions used to review the potential environmental effects of the proposed Modified Project for each of the following areas:

- Aesthetics;
- Agriculture Resources;
- Air Quality;
- Biological Resources;

- Cultural Resources;
- Energy;
- Geology and Soils;
- Greenhouse Gas Emissions;
- Hazards and Hazardous Materials;
- Hydrology and Water Quality;
- Land Use and Planning;
- Mineral Resources;
- Noise;
- Population and Housing;
- Public Services;
- Recreation;
- Transportation;
- Tribal Cultural Resources;
- Utilities and Service Systems; and
- Wildfire

The Modified Project would involve a minor change in the location of an injection well within the existing approved roadway ROW along Meadowview Lane, resulting in the relocation of previously planned monitoring wells at Meadow View Lane to the west side of Franklin Creek within Well Site #6, as shown in **Figure 1-3**. The change in location of the monitoring wells would not result in a meaningful change to the project or potential environmental impacts, as the site was previously evaluated for impacts from similar activities (well drilling) associated with an injection well.

The modification to extend the flood wall to protect the facility's transformers would result in less-than-significant impacts associated with the construction of the flood wall and barrier, because the proposed construction activities would be minor in scope and not involve invasive ground disturbance in a previously undisturbed area.

As explained below, the Modified Project is not associated with new significant impacts or greater severity of impacts compared to the Approved Project.

The following resource areas were found to have No Impact or Less than Significant Impact in the EIR and Addendum No. 1, and the Modified Project would also result in a finding of No Impact or Less than Significant Impact. No additional analysis is required for the following unchanged environmental resources evaluated in the EIR. For a discussion and analysis of the resources topics below please refer to the previous EIR, these resource areas are not analyzed further in this Addendum:

- 3.1 Aesthetics
 - 3.1-2) Damage scenic resources within the viewshed of a State scenic highway*
- 3.2 Agriculture and Forestry Resources
- 3.3 Air Quality
- 3.4 Biological Resources
 - 3.4-4) Interfere substantially with the movement of fish or wildlife;*

- 3.4-6) conflict with local, regional, or state habitat conservation plan*
- 3.5 Marine Biological Resources
 - 3.5-6) conflict with local, regional, or state habitat conservation plan*
- 3.6 Cultural resources
 - 3.6-1) cause substantial adverse change in the significance of a historical resource*
- 3.7 Energy
- 3.8 Geology and Soils
 - 3.8-1.i) cause potential substantial adverse effects involving rupture of known earthquake fault;*
 - 3.8-1.iv) cause potential substantial adverse effects involving landslides;*
 - 3.8-4) have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems*
- 3.9 Greenhouse Gas Emissions
- 3.10 Hazards and Hazardous Materials
 - 3.10-5) within two miles of a public airport or public use airport result in a safety hazard or excessive noise*
- 3.11 Hydrology and Water Quality
 - 3.11-2) substantially decrease groundwater supplies or interfere substantially with groundwater recharge*
 - 3.11-3) substantially alter the existing drainage pattern of the site or area*
- 3.12 Land Use and Planning
 - 3.12-1) physically divide an established community*
- 3.13 Mineral Resources
- 3.14 Noise
 - 3.14-2) 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*
- 3.15 Population and Housing
- 3.16 Recreation
- 3.17 Transportation
 - 3.17-2) conflict with CEQA Guidelines Section 15064.3, subdivision (b)*
- 3.18 Utilities and Service Systems
- 3.19 Wildfire
 - 3.19-4) expose people or structures to significant risks as a result of runoff, post-fire slope instability, or drainage changes*
- 3.20 Environmental Justice

This Addendum evaluates environmental resources where the proposed changes included in the Modified Project could result in changes to impacts and environmental resources that were potentially significantly impacted by the Approved Project and required mitigation as disclosed in the EIR. Given the Modified Project's consistency with the Approved Project in terms of construction techniques and location, the relocation of the monitoring and injection wells and extension of the flood gate would not introduce any

new or more severe environmental impacts. There is the potential for the Modified Project to have similar or lesser impacts as the Approved Project.

1.5 Summary of Findings

The environmental evaluation in this Addendum has concluded that major revisions of the EIR due to new significant environmental effects or a substantial increase in the severity of previously identified significant effects are not required. There are no substantial changes proposed in the Modified Project; no substantial changes in the circumstances under which the Modified Project would be undertaken; and no new information of substantial importance which was unknown or could not have been known at the time the EIR was certified. The impacts of the Modified Project are consistent with the impacts of the Approved Project in the EIR and Addendum No. 1. There are no new significant impacts resulting from implementation of the Modified Project, nor are there any substantial increases in the severity of any previously identified environmental impacts, and no new mitigation measures would be required. The environmental analysis in this Addendum and all feasible mitigation measures identified in the EIR and Addendum No. 1 would be incorporated into the resolutions approving the Modified Project.

2. PROJECT DESCRIPTION

2.1 Purpose of Project

The overall goal of the Project is described in the EIR's *Section 2.2 Project Purpose*. As with the Approved Project, the proposed Modified Project is expected to create an additional 1,100 acre-feet per year (AFY) potable water with three total injection wells and three monitoring well clusters.

The objectives of the Modified Project are the same as the original EIR, with a slight change in the location of an injection well and one monitoring well cluster, along with an extension of the AWPf site floodwall and addition of a flood barrier at the site entrance. There are no changes in the objectives related to volume in the Approved Project.

The Project objectives are:

1. Create a new, drought-resistant, reliable supply of local water.
2. Produce approximately 1,100 AFY on average advanced treated water suitable for groundwater recharge and potable reuse (at 1.3 MGD capacity)
3. Reduce CVWD's reliance on imported surface water and storage at Lake Cachuma.

2.2 Description of Modified Project

The proposed Modified Project would move the injection well on Meadow View Lane approximately 120 feet closer to Franklin Creek than in the Approved Project, but still within the evaluated and approved roadway ROW for the injection well. The injection well would remain within the roadway ROW included in the Approved Project for the injection well on Meadow View Lane and does not represent a change to the project. However, moving the injection well within the ROW would result in the relocation of the monitoring well cluster previously planned for Meadow View Lane. The Modified Project also includes extending the flood wall at the treatment plan site to enclose the transformers, which are currently outside the existing flood protection, and constructing a moveable flood barrier at the driveway to the site. These improvements would minimize the risk of transformer damage, provide improved flood protection at the site, and reduce the risk of potential operational impacts from storm events. This does not represent a meaningful change to the overall size of the proposed Project. There would be no change to the location of the conveyance pipelines.

Monitoring Wells and Injection Well Relocation

Following further design review and field evaluation, CVWD determined that relocating the injection well on Meadow View Lane approximately 120 feet closer to Franklin Creek was preferred to the original location identified in Addendum No. 1. The injection well would remain within the roadway ROW and the area evaluated for the injection well within Addendum No. 1 and does not represent a change to the Approved Project. Shifting the injection well closer to Frankly Creek necessitates moving the associated monitoring well cluster previously proposed along Meadow View Lane to Well Site #6, on the west side

of Frankline Creek. Moving the monitoring wells provides appropriate distance from the inject well and has additional benefits of improved site access, reduced construction disturbance, and consolidated groundwater monitoring infrastructure.

Well Site #6 was previously evaluated in the certified EIR as a potential location for project infrastructure, including injection wells and related improvements. The proposed monitoring wells would be constructed within this already-disturbed and previously analyzed site, west of Franklin Creek, and would not expand the project footprint beyond what has been evaluated in prior CEQA documentation.

Construction activities for the monitoring wells would be similar to those evaluated in the 2019 EIR and Addendum No. 1, involving temporary use of drilling equipment, vehicles, and staging areas.

Flood Wall Extension and Barrier

In addition to the well relocations, the Modified Project includes the extension of the existing flood wall surrounding the treatment facility to enclose the site's electrical transformers, which are currently situated approximately 20 feet outside the existing flood protection wall, shown in **Figure 2-1**. To achieve this, the flood wall would be extended approximately 25 feet outward and 75 feet along the rear of the facility, enclosing the transformers within the protected area. Additionally, a flood barrier would be installed below grade across the entrance to the site that would automatically rise in the event of flooding. These modifications would enhance facility resilience by protecting critical infrastructure from potential flood damage, thereby reducing the risk of operational disruption.

Figure 2-1: Current Facility Flood Wall



Construction methods for the flood wall extension would involve minor grading, excavation and concrete pads to create a level surface for the flood wall. The flood wall would be constructed with cinderblocks approximately 3-feet in height above grade to a top-of-wall elevation of 21.77 for flood protection and topped with a chain-link fence and barbed wire for security, consistent with the existing floodwall shown in **Figure 2-1**. Excavation would be minimal and there would be minimal ground disturbance. The flood barrier would be constructed across the entrance to the site. A 4-foot by 10-foot pit would be excavated to 4 feet below grade to create a vault to house the barrier. The barrier is a pre-fabricated system that would be installed in the vault and is designed for this specific use. Following installation of the barrier, the driveway would be repaired and suitable for driving over. The activity would occur within previously disturbed areas of the purification facility and would not expand the project footprint.

2.2.1 Construction Equipment and Staging

The construction equipment required for well construction and the flood wall and barrier would be similar as those needed for the Approved Project. The Modified Project's construction equipment is listed in **Table 2-1**.

Table 2-1: Construction Equipment

Equipment		
Truck-mounted drill rigs	Compactors	Flat-bed delivery trucks
Track-mounted excavators	End and bottom dump trucks	Forklifts
Backhoes	Front-end loaders	Concrete trucks
Graders	Water trucks	Compressors/jack hammers
Crane	Paver and roller	Scrapers

Staging areas for the Modified Project would be selected using the same criteria described in the certified 2019 EIR for the Approved Project and are anticipated to be consistent with previously approved conditions. Specifically:

- **WWTP Site Facilities:** Staging for construction of facilities at the Carpinteria Sanitary District (CSD) WWTP would occur on the existing paved and walled site.
- **Injection and Monitoring Wells:** Staging areas would be located within the temporary construction easements for each well site.
- **Roadway or Paved Area Use:** If staging uses paved surfaces or roadway rights-of-way, these areas would be restored to pre-construction conditions consistent with applicable City standards.

- **Sensitive Resource Proximity:** Staging may occur within approximately 50 feet of sensitive embankments, such as Franklin Creek (Injection Well Site #4) or Carpinteria Creek (AWPF). Staging in these areas would be sited on previously paved or developed areas to avoid new environmental impacts.

2.2.2 Construction Trip Generation

During construction, the Modified Project would generate trips associated with construction crews and material deliveries. Construction of the Modified Project would generate a similar, but slightly higher (less than 10), number of trips as the Approved Project. Trips include up to approximately 14,800 round-trip trips during the duration of the construction period, including approximately 1,330 round trips for off hauling of export material, 4,370 round trips for delivery of materials from vendors, and 9,100 round trips for workers.

2.2.3 Construction Schedule

In total, active construction of the Project, including the modified elements, is estimated to take approximately 36 months, with anticipated commencement in Q2 2026 and completion in Q4 2028, which is three years later than the initial construction schedule published in the EIR. Construction of all Project components (injection and monitoring wells, conveyance pipelines, and AWPF) would occur simultaneously.

2.2.4 Project Operation and Maintenance

The Modified Project would not change the total number of monitoring or injection wells. Because the Modified Project includes the same number of wells as the Approved Project, there would be no changes to operation and maintenance (O&M) for either injection wells or monitoring wells. The addition of the flood barrier would require an annual cleaning of the barrier at the CSD site, but this does not represent a substantial change to O&M. The O&M activities for the project's key facilities include:

- AWPF:
 - Daily inspections and maintenance of UF, RO, and UV/AOP treatment processes.
 - MF/UF: Backflush for 60 to 120 seconds at 20- to 40-minute intervals; daily chemically enhanced backwash cleans; weekly to monthly chemical clean-in-place. Membranes estimated to be replaced every six years.
 - RO: Chemical CIP monthly; membranes estimated to be replaced every five years.
 - Annual cleaning of the flood barrier
- Pump stations: daily inspections and routine pump maintenance
- Pipelines: periodic inspections of pipeline and exercising valves

- Injection wells: periodic backflush one time per week per well for approximately 60 minutes; backflush flowrate up to two times the injection flowrate, anticipated to be 900 gallons per minute, weekly inspections by CVWD staff.
- Chemical delivery: deliveries of AWPf chemicals, up to eight truck trips per month depending on chemical supplier and logistics
- Monitoring wells: periodic visits to conduct water sampling and monitoring

2.3 Environmental Commitments

Environmental commitments shall be consistent with those included in the Final EIR for the Approved Project, as modified in Addendum No. 1. These environmental commitments shall be included in the Modified Project's plans and specifications and in its construction contracts, and are in addition to compliance with applicable permits, laws, and regulations. These environmental commitments are part of the Modified Project.

- **Time construction to reduce interference with community needs.** Construction timing shall avoid construction near schools during the school year to the extent feasible, and avoid construction on the portion of Linden Avenue south of Highway 101 that runs through the downtown core during high tourism and shopping periods (e.g., summer and the Christmas holiday season). Timing construction in this way would reduce impacts to students and schools, as well as reduce potential impacts to the commercial corridor on Linden Avenue, supporting the local economy.
- **Avoid nighttime activities where possible during construction and operation.** To the extent reasonable, CVWD and CSD shall comply with the timing of construction as outlined in the City's Municipal Code, and shall obtain permits for any nighttime construction. During operation, CVWD and CSD shall avoid truck trips, deliveries, and maintenance activities during nighttime hours, except in the case of emergencies or where avoidance of nighttime hours are infeasible.
- **Provide biological and cultural resource training to workers.** CVWD shall provide biological sensitivity and cultural resource awareness training. These trainings shall be conducted by a certified biologist and archaeologist, respectively. Workers shall be trained to identify sensitive species and to halt work and consult with a biologist if sensitive species are encountered unexpectedly. Workers involved with excavation and ground disturbing activities shall be trained to identify potential cultural resources and to halt work and call in a qualified archaeologist if they believe cultural resources have been encountered. Workers shall also be trained to stop work and call the County Coroner if they encounter human remains.
- **Keep construction areas clean of trash and debris.** Workers shall also be required to comply with worker cleanliness guidelines that are designed to reduce the potential for trash or debris to leave the construction sites. These guidelines may include: disposal of food related trash in closed containers and

removed from the project site each day during the construction period, prohibition on feeding wildlife at or near the construction area, and upon project completion, removal of all project-generated debris, vehicles, building materials, and rubbish from the project footprint.

- **Implement Santa Barbara County Air Pollution Control District (SBCAPCD) and California Air Resources Board (CARB) Construction Best Management Practices.** Contractors shall be required to comply with the SBCAPCD's construction best management practices, which include diesel equipment and vehicle regulations and dust control measures. These construction best management practices are detailed in Section 2.1.7 of Appendix C. Additionally, contractors shall comply with CARB In-Use Off-Road Diesel-Fueled Fleets Regulations, which would limit vehicle idling time to 5 minutes, restrict adding vehicles to construction fleets with older-tier engines, and establish a schedule for retiring older, less fuel-efficient engines from the construction fleet.
- **Compliance with Permit Requirements.** CVWD and/or CSD shall acquire and comply with necessary permits, depending on which facility locations are selected in final project design. Potential permits are shown in **Table 2-2**, may reflect the mitigation measures proposed in this EIR, and may include additional environmental commitments suggested by the permitting entity. CVWD shall obtain and comply with the SWRCB's General Construction Permit, including preparation of a Storm Water Pollution Prevention Plan (SWPPP), for all Project facilities. CVWD and/or CSD shall prepare appropriate noticing as required for permits, such as may be required for the California Coastal Commission Coastal Development Permit.
- **Coordinate with Caltrans.** CVWD shall coordinate with Caltrans to secure an encroachment permit for any construction work within the State's right-of-way. CVWD shall submit its design drawings to Caltrans for confirmation that work within the State's right-of-way complies with Caltrans standards. CVWD shall implement any conditions of approval and requirements of the encroachment permit as determined by Caltrans' District 5 Permits office.
- **Post-Construction Restoration:** CVWD shall restore areas disturbed by construction to pre-construction conditions, such as replanting vegetation cleared for construction activities or patching/repaving roadways where open trenching was used for pipeline construction.

2.4 Permits and Discretionary Approvals

Anticipated permits for the Modified Project are identified in **Table 2-2** and does not represent additional permits from those identified for the Approved Project.

Table 2-2: Permits and Approvals

Agency	Type of Approval
Federal	
U.S. Environmental Protection Agency	Maintains inventory for Underground Injection Program
U.S. Fish and Wildlife Service (USFWS)	Federal Endangered Species Act (FESA) consultation for sensitive species (potential)
State	
State Water Resources Control Board – Department of Drinking Water	Review and approval of Engineering Report; Recommendations to Central Coast Regional Water Quality Control Board for Waste Discharge Requirements NPDES General Construction Permit/Stormwater Pollution Prevention Plan (SWPPP)
Central Coast Regional Water Quality Control Board (Region 3)	Issuance of updated Waste Discharge Requirements for CSD WWTP (Order No. R3-2017-0032 [National Pollutant Discharge Elimination System (NPDES) Permit CA0047364])
California Department of Fish and Wildlife	NPDES for backflush discharge into Franklin Creek (if sewer discharge not used) CA Endangered Species Act consultation for sensitive species
California Department of Transportation (Caltrans)	Encroachment Permit
Cal/OSHA	Excavation and Dirt Moving Permit
California Division of Industrial Safety	Safety Permit
Local	
City of Carpinteria	Conditional Use Permit/Coastal Development Permit Approval of Traffic Management Plan Approval of Construction SWPPP Encroachment Permits Transportation Permit
Santa Barbara County Planning and Development	Coastal Development Permit (if Well Site #6 selected)
Santa Barbara County Environmental Health Services	Well/Boring Installation Permit
Carpinteria Summerland Fire Protection District	Hazardous Materials Business Plan approval

3. EVALUATION OF ENVIRONMENTAL IMPACTS

The following includes an environmental review pursuant to CEQA, incorporating environmental evaluation thresholds based on the checklist questions from Appendix G of the CEQA Guidelines. The analysis herein evaluates the adequacy of the environmental impact findings and mitigation of the Approved Project, the Carpinteria Advanced Purification Project, relative to impacts and mitigation of the Modified Project. The Carpinteria Advanced Purification Project EIR was approved by the CVWD Board of Directors on December 11, 2019.

3.1 Aesthetics

As explained in in *Section 1.4 Evaluation of Environmental Impacts*, this analysis only discusses checklist questions 3.1-1, 3.1-3, and 3.1-4, because the other topics under Aesthetics were found to be No Impact or Less than Significant Impact in the EIR and the finding would not change under the Modified Project.

The Approved Project's pipelines, monitoring wells, and injection wells would be constructed underground, with aboveground wellhead facilities and electrical services placed visually screened by cages, fences, or vegetation. The Approved Project's AWPf would be visually consistent with the existing CSD site. As a result, the Approved Project would not substantially adversely impact local scenic vistas of surrounding foothills and mountains, and impacts to scenic vistas (checklist question 3.1-1) would be less than significant. Further, the Approved Project would be designed to be consistent with the existing visual character of the surrounding area and consistent with the objectives and policies identified in the City's *General Plan/Local Coastal Land Use Plan* and the Creeks Preservation Program. The Approved Project would comply with all applicable regulations that govern scenic quality. As a result, it was found to have less than significant impacts on urban zoning or regulations that govern scenic quality (checklist question 3.1-3).

Most construction activities for the Approved Project would occur during the day and would not require nighttime work, though some nighttime construction may be required for well drilling activities. Should nighttime work be necessary at any point, CVWD and CSD would obtain permits for any nighttime construction. During operation, truck trips, deliveries, and maintenance activities would be avoided during nighttime hours, except in the case of emergencies or where avoidance of nighttime hours is infeasible. New sources of light or glare associated with the Project would be installed around the new equipment at the AWPf and would be similar to and in proximity to existing light sources at the WWTP site. New light sources at the injection wells would typically remain off and would only be used if a problem occurs at night and light is needed to address the issue. Mitigation is required for the Approved Project to reduce the potential impacts associated with security lighting. **Mitigation Measure MM 3.1-4** requires nighttime lighting to be of low intensity, directed downward, shielded, and directed away from sensitive habitats, receptors, and residential areas. With mitigation, impacts associated with light and glare (checklist question 3.1-4) would be less than significant with the Approved Project.

The Modified Project would have similar visual effects to the Approved Project because the location and facilities included in the Modified Project are similar to those in the Approved Project. Relocating the monitoring wells to Well Site #6 would not introduce new visual or environmental impacts because the site was previously evaluated for an injection well. Injection wells and monitoring wells are both installed underground, though monitoring wells typically result in fewer visual impacts than injection wells because they do not have aboveground wellhead equipment or electrical. In addition, the planned adjustments to the flood gate and flood wall are minor in scope and consistent with existing uses and visuals at the AWPf site. The Modified Project would be designed consistent with the Approved Project, and would not alter the design, scale, or placement of aboveground facilities beyond what was already considered for the Approved Project. The Modified Project would not introduce new visual elements, increase the visibility of project components, or change the duration or intensity of construction activities compared to the Approved Project. Because the Modified Project does not change the types of facilities that are being constructed, and the flood wall and flood barrier would be incorporated into the existing walls and gates at the CSD site, it would have the same lighting needs as the Approved Project, and potential impacts from security lighting would be the same as the Approved Project. Therefore, **Mitigation Measures MM 3.1-4** would still apply to the Modified Project to address potential for impacts associated with security lighting. With this mitigation, the Modified Project would not cause any new significant impacts, and no additional mitigation measures are warranted.

Mitigation Measures:

To mitigate possible visual impacts to public views and lighting during construction and operation, CVWD shall implement **Mitigation Measure MM 3.1-4**, listed below, which was previously adopted in the EIR for the Approved Project. The impacts of the Modified Project are the same as the Approved Project: less than significant with mitigation incorporated. No new mitigation is required for the Modified Project.

- **MM 3.1-4 Minimize Light and Glare.** CVWD shall ensure that all construction and operational lighting be of the lowest intensity necessary for public safety purposes. Lighting shall be of low intensity, shall be directed downward and at the immediate work area, and shall be shielded to minimize halo and spillover effects. Lighting shall be directed away from sensitive habitats and receptors, as well as away from neighboring residential areas. Additional protective measures, such as light glare shields, may be used if light sources are still directly visible from neighboring residential areas or interferes with scenic views after lighting is installed and oriented as described in this mitigation measure.

3.2 Agriculture and Forestry Resources

As explained in *Section 1.4 Evaluation of Environmental Impacts*, all topics under Agriculture and Forestry Resources were found to have No Impact or Less than Significant Impact for the Approved Project, and the finding would not change under the Modified Project. The new proposed locations for the monitoring wells and the extension

of the flood gate would not be located within designated Farmland or agricultural land. Therefore, potential impacts under Agriculture and Forestry Resources would remain less than significant under the Modified Project. There would be no new impacts as a result of the Modified Project and no new mitigation would be required.

Mitigation Measures

None required or recommended.

3.3 Air Quality

As explained in *Section 1.4 Evaluation of Environmental Impacts*, all topics under Air Quality were found to have No Impact or Less than Significant Impact for the Approved Project, and the finding would not change under the Modified Project.

The Modified Project would result in construction activities that are similar in nature and scope to those analyzed for the Approved Project. All other assumptions used for the air quality analysis conducted via CalEEMod would remain the same because the Modified Project would use the same or similar construction methods, there are no additional monitoring or injection wells, and there are no substantial changes to the length of pipeline to construct. Because all other assumptions related to air quality would remain the same or substantially similar, the Modified Project would have similar potential to impact air quality compared to the Approved Project as evaluated in the EIR. Therefore, no new impacts would occur as a result of the Modified Project and no new mitigation would be required.

Mitigation Measures

None required or recommended.

3.4 Biological Resources

As explained in in *Section 1.4 Evaluation of Environmental Impacts*, this analysis only discusses checklist questions 3.4-1, 3.4-2, 3.4-3, and 3.4-5, because the other topics under Biological Resources were found to be No Impact or Less than Significant Impact for the Approved Project and the findings for those checklist questions would not change under the Modified Project.

3.4-1) 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 USFWS

While no special status plant or terrestrial wildlife species were observed in the Biological Resources Area of Potential Effect (APE), the EIR did find that six special status wildlife species had the potential to occur in the Approved Project's APE given the surrounding environment and historic sightings of the species. Those species and their potential to occur are as follows:

- Monarch (Moderate)
- Tidewater goby (High)

- Steelhead (High)
- California legless lizard (Low)
- Western snowy plover (Moderate)
- Yellow warbler (Moderate)

Mitigation Measures MM 3.4-1a (Worker Environmental Awareness Program), **MM 3.4-1b** (Nesting Bird Surveys), and **MM 3.4-1c** (Avoidance of Monarch Butterfly Winter Roost Sites) are included in the EIR to avoid potential impacts that the Approved Project could have on special status terrestrial, aquatic, and bird species; and related **Mitigation Measure MM 3.1-4** (Minimize Light and Glare) under *Section 3.1, Aesthetics*, additionally supports the avoidance of impacts on species. The EIR concluded that effects to special status species were less than significant with implementation of mitigation measures.

While there are locations in the Modified Project which were not originally identified as potential monitoring well locations in the Approved Project, Well Site #6 was identified as a potential injection well location and was surveyed as part of the Approved Project's APE for pipe laydown and water conveyance. The APE evaluated for the Approved Project included the portion of the AWPF site that would include the flood wall and flood barrier. All locations containing Modified Project elements have therefore been surveyed and the risk of presence for special status species the same as that of the Approved Project. The construction and operation activities of the Modified Project would be substantially similar to that of the Approved Project, and therefore the potential for impacts to special status species would also be the same as the Approved Project. Mitigation measures **MM 3.4-1a**, **MM 3.4-1b**, and **MM 3.4-1c** would apply equally to the Modified Project, therefore, no new impact would occur, and no new mitigation would be required.

3.4-2) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or USFWS

The Approved Project would use an open cut trench method along Olive Avenue, which is a developed public ROW, for a portion of the primary pipeline alignment. Open cut trenching and/or construction materials (e.g., stockpiled materials, construction equipment, and trash) have the potential to result in potentially significant indirect impacts to the arroyo willow thicket located in this area. The arroyo willow thicket meets the criteria for classification of an environmentally sensitive habitat area (ESHA), a coastal zone wetland, and a CDFW sensitive natural community. **Mitigation Measure MM 3.4-1a** requires worker environmental awareness training, while **Mitigation Measure MM 3.4-3c** includes construction best management practices (BMPs) to minimize runoff and conveyance of pollutants into creeks. Compliance with other regulatory guidance and permits, such as erosion control and water quality BMPs in the General Construction Permit SWPPP, would also serve to protect riparian habitats and species. In addition, hazardous materials containment and spill response requirements in **Mitigation Measure MM 3.10-1b** would help to reduce potential construction-related impacts to riparian and sensitive communities by reducing the potential for pollutants to enter these habitats. With implementation of **Mitigation Measures MM 3.4-1a**, and **MM 3.4-2**, which will require

training of workers to identify and avoid sensitive habitat and use temporary fencing to delineate and avoid sensitive habitat areas, potential indirect impacts to the arroyo willow thicket would be reduced to a less than significant level.

Staging and soundwalls may be located within 50 feet of the embankment for Franklin Creek but would remain on existing paved surfaces. As noted for the Approved Project, the County's Coastal Land Use Plan's Policy 9-37 requires a minimum buffer of 50 feet for urban creeks, but allows for the buffer to be adjusted upwards or downwards on a case-by-case basis following consultation with Department of Fish and Game (now Fish and Wildlife) and the Regional Water Quality Control Board to ensure protection of stream and water quality. The Approved Project is pursuing a Coastal Development Permit, which includes requirements to protect stream water quality. The Coastal Development Permit will include the staging and soundwalls within 50 feet of the Creek. With compliance with the permit, the Approved Project there would be no significant impacts associated with staging within 50 feet of the creeks. **Mitigation Measure 3.4-3b** has been modified to clarify that staging could occur within 50 feet of a creek if allowed by the applicable permit, such as the Coastal Development Permit.

The monitoring wells that would be relocated to Well Stie #6 under the Modified Project would remain outside of the 50-foot buffer for Franklin Creek, consistent with the County's Coastal Land Use Plan's Policy 9-37 and the Approved Project. The monitoring wells at Well Site #6 would not be located within riparian habitat or other sensitive natural communities under the Modified Project. The extension of the flood wall and modification to the flood gate occur on land that does not contain riparian habitat or other sensitive natural communities, though it would be near the ESHA habitat by Olive Street. However, the portion of the site that the flood wall would extend around has previously been disturbed to accommodate the electrical boxes that would be enclosed by the wall extension. Because the Modified Project would include the same or substantially similar construction methods and locations as the Approved Project at Well Site #6 (with the difference being construction of a monitoring well cluster instead of an injection well) and the AWPf site (for the flood wall and barrier), the Modified Project would have similar potential impacts to riparian habitat or sensitive natural community as the Approved Project.

With implementation of the Environmental Commitments, including compliance with regulatory guidance and permits such as erosion control and water quality BMPs in the General Construction Permit SWPPP, and trash and debris management, along with implementation of **Mitigation Measures MM 3.4-1a, MM 3.4-2, MM 3.4-3c, and MM 3.10-1b**, the Modified Project's potential impacts and would be reduced to less than significant. Therefore, no new impacts would occur, and no new mitigation would be required.

3.4-3) 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

Impacts to Carpinteria Creek would not occur under the Approved Project. However, because Well Site #6 is selected for construction of two monitoring wells under the Modified Project, there would be limited potential for impacts to Franklin Creek during construction of the creek crossing. Project-related direct impacts to Franklin Creek would be less than significant due to selection of trenchless or pipe bridge construction methods. Indirect impacts from construction materials (e.g., stockpiled materials, construction equipment, and trash) that may be stored onsite could adversely affect water quality (e.g., increased turbidity, altered pH, decreased dissolved oxygen levels, etc.) within the jurisdictional waters if runoff were to occur during storm events and BMPs were not implemented. Therefore, **Mitigation Measures MM 3.4-3a** (Disturbance Area and Staging), **MM 3.4-3b** (Material Storage), and **MM 3.4-3c** (Construction Best Management Practices) shall be implemented within 50 feet of Franklin Creek and Carpinteria Creek to avoid potential indirect impacts to water quality within these jurisdictional features. With implementation of these mitigation measures (and adherence to agency permits and existing regulations), potential indirect impacts to creeks would be reduced to a less than significant level.

The Modified Project would be constructed in the same areas as the Approved Project, including Well Site #6 and immediately adjacent to the AWPf site. It would use the same construction methods as the Approved Project and therefore present the same potential for impacts to Franklin Creek and Carpinteria Creek as the Approved Project. As a result, **Mitigation Measures MM 3.4-3a** (Disturbance Area and Staging), **MM 3.4-3b** (Material Storage), and **MM 3.4-3c** (Construction Best Management Practices) would still be required within 50 feet of Franklin Creek and Carpinteria Creek, and construction BMPs noted in the Environmental Commitments implemented. With implementation of these measures, the Modified Project would have the same potential for impacts to protected wetlands as the Approved Project and no new mitigation measures would be required.

3.4-5) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance

As described in the certified EIR, the Carpinteria General Plan/Local Coastal Land Use Plan Policy OSC-8 (*Protect and Conserve Monarch Butterfly Tree Habitat*) requires setbacks from habitats used by special-status species, including a 300-foot buffer from nesting and roosting trees of sensitive raptors. **Mitigation Measure MM 3.4-1b** requires pre-construction nesting bird surveys, and setbacks may be reduced by a qualified biologist based on survey results. Policy OSC-8 also protects trees supporting monarch butterfly populations. Suitable roosting habitat occurs in the project area, and **Mitigation Measures MM 3.4-1a** and **MM 3.4-1c** require worker training and avoidance measures to prevent impacts. **Mitigation Measure MM 3.4-5** would reduce potential impacts to protected trees by restricting activities within 20 feet of the canopy drip line for protected

trees, and coordination with a certified arborist to minimize potential impacts to protected trees where work occurs within 20 feet of the canopy drip line, as permitted.

Policy OSC-6 (*Preserve the Natural Environmental Qualities of Creekways and Protect Riparian Habitat*) and County Ordinance §35-97.19 (*Development Standards for Stream Habitats*) require a minimum 50-foot setback from streams. The Approved Project would not construct permanent facilities within this buffer. Temporary staging near Carpinteria and Franklin Creeks would occur within existing paved or disturbed areas and remain consistent with applicable policies. The City's Policy OSC-6 does not apply to temporary construction activities, and County Policy 9-37 allows buffer adjustments on a case-by-case basis. Compliance with the Coastal Development Permit and **Mitigation Measure MM 3.4-3c** (Construction Best Management Practices) would ensure no impacts to the creeks.

Under the Modified Project, project activities would occur within the same biological Area of Potential Effect analyzed for the Approved Project, and construction and operation would use the same or similar methods as the Approved Project. Therefore, the Modified Project would have the same or similar potential impact to as the Approved Project as related to compliance with local policies or ordinances that protect biological resources. All previously adopted mitigation measures address impacts to biological resources — including **MM 3.4-1a** through **MM 3.4-1c**, **MM 3.4-3c** and **MM 3.4-5** — remain applicable and would continue to reduce potential impacts to less than significant.

Mitigation Measures:

To mitigate potential impacts to biological resources during construction and operation, CVWD shall implement **Mitigation Measures MM 3.4-1a, MM 3.4-1b, MM3.4-1c, MM 3.4-2, MM 3.4-3a, MM 3.4-3b, MM 3.4-3c, and MM 3.4-5** which were previously adopted for the Approved Project and listed below. Mitigation Measure 3.10-1b would also apply to both the Approved Project and the Modified Project, and is described in Section 3.10 below. The impacts of the Modified Project are the same as the Approved Project: less than significant with mitigation incorporated. No new mitigation is required for the Modified Project.

- **MM 3.4-1a Worker Environmental Awareness Program.** Prior to initiation of all construction activities (including staging and mobilization), all personnel associated with Proposed Project construction shall attend a WEAP training, conducted by a qualified biologist, to assist workers in recognizing special status biological resources that may occur in the Biological Resources APE. This training will include information about southern California steelhead, tidewater goby, protected nesting birds, marine mammals, as well as other special status species potentially occurring in the Biological Resources APE.

The specifics of this program shall include identification of special status species and habitats, a description of the regulatory status and general ecological characteristics of special status resources, and review of the limits of construction and measures required to avoid and minimize impacts to biological resources

within the work area. Training for workers who will be involved with the ocean outfall improvements will also include vessel-based monitoring training for identification of marine mammals. A fact sheet conveying this information shall also be prepared for distribution to all contractors, their employees, and other personnel involved with construction of the Proposed Project. All employees shall sign a form provided by the trainer documenting they have attended the WEAP and understand the information presented to them. The crew foreman shall be responsible for ensuring crew members adhere to the guidelines and restrictions designed to avoid impacts to special status species. If new construction personnel are added to the project, the crew foreman shall ensure that the new personnel receive the WEAP training before starting work. The subsequent training of personnel can include videotape of the initial training and/or the use of written materials rather than in-person training by a biologist.

- **MM 3.4-1b Nesting Bird Surveys.** To avoid disturbance of nesting and special status birds, including raptor species protected by the Migratory Bird Treaty Act of 1918 (MBTA) and CFGC 3503, activities related to the project including, but not limited to, vegetation removal, ground disturbance, and construction and demolition shall occur outside of the bird breeding season for migratory birds (February 1 through August 31), if practicable.

If construction must begin during the breeding season, then a pre-construction nesting bird survey shall be conducted no more than seven days prior to initiation of ground disturbance and vegetation removal activities. The nesting bird pre-construction survey shall be conducted on foot inside the project footprint, including a 100-foot buffer (300-foot for raptors), and in inaccessible areas (e.g., private lands) from afar using binoculars to the extent practicable. The survey shall be conducted by a biologist familiar with the identification of avian species known to occur in southern California coastal communities. If nests are found, an avoidance buffer (dependent upon the species, the proposed work activity, and existing disturbances associated with land uses outside of the site) shall be determined and demarcated by the biologist with bright orange construction fencing, flagging, construction lathe, or other means to mark the boundary. All construction personnel shall be notified as to the existence of the buffer zone and to avoid entering the buffer zone during the nesting season. No ground-disturbing activities shall occur inside this buffer until the avian biologist has confirmed that breeding/nesting is completed, and the young have fledged the nest. Encroachment into the buffer shall occur only at the discretion of the qualified biologist

- **MM 3.4-1c Avoidance of Monarch Butterfly Winter Roost Sites.** To minimize indirect project impacts to potential monarch butterfly roosts, monarch butterfly roosts shall be avoided during all construction activities related to project activities, tree removal/trimming, vegetation clearing, and grading activities (collectively, "land clearing activities"). This can be accomplished by implementing either one of the following options:
 1. Prohibit land clearing activities during the monarch wintering season

(October 1 through March 1); or,

2. Conduct site-specific surveys prior to land clearing activities during the monarch wintering season (October 1 through March 1) and avoid monarch roosts.

If Option 2 is selected, surveys (described below) shall be conducted to identify any monarch roosts in the area proposed for disturbance. Monarch roosts shall be avoided during the wintering season by establishing a 50-foot buffer between land clearing activity and the roost.

An initial monarch survey shall be conducted of all potentially suitable habitat areas within the APE 30-days prior to the initiation of land clearing activities. The project site must continue to be surveyed on a weekly basis with the last survey completed no more than 7 days prior to the initiation of land clearing activities. The monarch butterfly survey must cover monarch wintering habitat within the APE. If monarch roosts are found, land clearing activities within 50 feet surrounding the roost shall be postponed or halted while the monarchs are present (typically October 1 through March 1). Construction activities may occur outside of the 50-foot setback areas during this time.

- **Mitigation Measure MM 3.4-2 Sensitive Habitat Fencing.** Prior to project mobilization, where the project is adjacent to native habitat (i.e., ESHA, riparian habitat, wetland, sensitive natural communities), a certified biologist would identify native habitat to avoid, and temporary construction fencing shall be erected by the contractor at the edge of the temporary construction easement to avoid impacts to the habitat throughout the duration of construction.
- **MM 3.4-3a Disturbance Area and Staging.** Areas of temporary disturbance shall be minimized to the extent practicable. Staging and laydown areas shall be limited to sites unvegetated, previously disturbed (e.g., ROWs, parking lots), and community parks (areas consisting of ruderal vegetation, ornamental landscaping, and outside of the Tree Protection Zone [TPZ; dripline plus 6 feet] of protected trees).
- **MM 3.4-3b Material Storage.** Construction materials for pipelines, injection wells, monitoring wells, and backflush tank, shall be stored on impervious surfaces or plastic ground covers to prevent any spills or leakage. Material storage shall be at least 50 feet from Franklin Creek, Carpinteria Creek, and Carpinteria State Beach, unless otherwise allowed by applicable permits. Any material/spoils from project activities shall be located and stored 50 feet from potential jurisdictional areas (Franklin Creek, Carpinteria Creek, and Carpinteria State Beach) unless otherwise allowed by applicable permits. Construction materials and spoils shall be protected from stormwater runoff using temporary perimeter sediment barriers such as berms, silt fences, fiber rolls, covers, sand/gravel bags, and straw bale barriers, as appropriate.

- **MM 3.4-3c Construction Best Management Practices.** To avoid and/or minimize potential indirect impacts to jurisdictional waters and water quality, the following BMPs shall be implemented within 50 feet of Franklin Creek and Carpinteria Creek:
 - a) Prevent the off-site tracking of loose construction and landscape materials by implementing street sweeping, vacuuming, and rumble plates, as appropriate.
 - b) Prevent the discharge of silt or pollutants off of the site when working adjacent to potentially jurisdictional waters. Install BMPs (i.e., silt barriers, sandbags, straw bales) as appropriate.
 - c) Work adjacent to Franklin and Carpinteria Creeks shall ensure no wash water enters the receiving water bodies, through measures that may include locating site washout areas at least 50 feet from a storm drain, open ditch or surface water or implementation of barriers to control runoff, such that runoff flows from such activities do not enter receiving water bodies.
 - d) All vehicles and equipment shall be in good working condition and free of leaks. The contractor shall prevent oil, petroleum products, or any other pollutants from contaminating the soil or entering a watercourse (dry or otherwise). When vehicles or equipment are stationary, mats or drip pans shall be placed below vehicles to contain fluid leaks.
 - e) All re-fueling, cleaning, and maintenance of equipment will occur at least 50 feet from potentially jurisdictional waters (Franklin Creek, Carpinteria Creek, and the roadside storm water drain).
 - f) Any spillage of material will be stopped if it can be done safely. The contaminated area will be cleaned, and any contaminated materials properly disposed. For all spills, the project foreman or other designated liaison will notify CVWD immediately.
 - g) Adequate spill prevention and response equipment shall be maintained on site and readily available to implement to ensure minimal impacts to the aquatic and marine environments.
- **Mitigation Measure MM 3.4-5 Tree Protection Zone Restrictions.** Components of the project footprint that occur within 20 feet of the canopy drip line of protected trees shall be subject to the following:
 - a. No ground disturbance, grading, trenching, construction activities or structural development shall occur within the tree protection zone (TPZ; dripline plus 6 feet).
 - b. No equipment, soil, or construction materials shall be placed within the TPZ. No oil, gasoline, chemicals, paints, solvents, or other damaging materials may be deposited within the TPZ or in drainage channels, swales or areas that may lead to the TPZ.
 - c. If work within the TPZ cannot be avoided, a qualified arborist shall monitor all

activities within the TPZ of protected trees.

- d. Unless otherwise directed by the arborist, all work within the TPZ, including brush clearance, digging, trenching and planting, shall be done with hand tools or small hand-held power tools that are of a depth and design that will not cause root damage.
- e. Where trenching or digging within the TPZ is specifically permitted, the work shall be conducted in a manner that minimizes root damage, as directed by an arborist.
- f. Grade changes outside of the TPZ shall not significantly alter drainage to protected trees. Grading within the TPZ shall use methods that minimize root damage and ensure that roots are not cut off from air. Where erosion may be a factor return and protect the original grade or otherwise stabilize the soil.
- g. Protected trees shall not be used for posting signs, electrical wires or pulleys; for supporting structures; and shall be kept free of nails, screws, rope, wires, stakes and other unauthorized fastening devices or attachments.

3.5 Marine Biological Resources

The potential for impacts to marine biological resources were only associated with the construction of the ocean outfall improvements. As noted in Section 1.1.1, above, the ocean outfall is part of the Approved Project but has already been completed. The Modified Project does not include any additional modifications to the ocean outfall, nor does it include any activities that would have potential to impact marine resources because it would not be located adjacent to the ocean or have any new nexus to the marine environment. Additionally, the Modified Project would not increase the volume or concentrations of discharges from the AWPf compared to the Approved Project. Therefore, the Modified Project would have no changes from the Approved Project related to the potential impacts on Marine Biological Resources. As a result, additional analysis of potential impacts to Marine Biological Resources is not needed for the Modified Project. Therefore, no new impact would occur as a result of the Modified Project and no new mitigation would be required.

The Modified Project would not require implementation of mitigation measures associated with reducing potential impacts to Marine Biological Resources because the Modified Project proposes no changes to the ocean outfall improvements of the Approved Project that were previously completed.

3.6 Cultural Resources

As explained in in Section 1.4 Evaluation of Environmental Impacts, this analysis only discusses checklist questions 3.6-2 and 3.6-3, because the other topics under Cultural Resources were found to be No Impact or Less than Significant Impact for the Approved Project and the finding would not change under the Modified Project.

3.6-2) Cause a substantial adverse change in the significance of a unique archaeological resource pursuant to Section 15064.5

The Cultural Resources Assessment, included as Appendix E to the EIR, indicates CHRIS-CCIC records search found one prehistoric archaeological site, CA-SBA-7, mapped within the 0.5 mile radius cultural resources Study Area, specifically at the WWTP site along Carpinteria Creek. However, review of previous records and archaeological investigations conducted within proximity to the site indicate that the resources associated with CA-SBA-7 are largely concentrated to the east of Carpinteria Creek outside of the Study Area. Furthermore, previous construction activities at the WWTP site have greatly disturbed the underlying soil, and it is likely that any cultural deposits associated with CA-SBA-7 that were once present in the Study Area have since been substantially disturbed or destroyed. However, given the general sensitivity of the Study Area for containing archaeological resources, the Approved Project requires implementation of **Mitigation Measure MM 3.6-2a**, which would require archaeological and Native American monitoring for initial ground disturbance up to a depth of 10 feet within the vicinity of CA-SBA-7 (the AWPf and directly adjacent conveyance pipelines), and **Mitigation Measure MM 3.6-2b** would be implemented in the event of unanticipated discovery of cultural resources during ground-disturbing activities. Additionally, CVWD would conduct cultural resources awareness training for construction workers, including how to identify archaeological resources during ground-disturbing activities (see *Section 2.10, Environmental Commitments* in the EIR). With implementation of mitigation measures and environmental commitments, impacts would be less than significant.

The relocation of monitoring wells and the modifications to the flood gate and flood wall are within areas previously assessed for archaeological resources, and are not located closer to any identified archaeological site than the Approved Project. Construction methods would be the same or substantially similar as the Approved Project, and no risks to archaeological resources would occur during operation of the Modified Project; therefore, the potential impacts on archaeological resources would be the same as the Approved Project. No new impacts would occur, and no additional mitigation measures are required.

3.6-3) Disturb any human remains, including those interred outside of formal cemeteries

Human remains are not anticipated to be encountered during construction of the Approved Project due to the disturbed and developed nature of the majority of the Study Area. However, as with any ground-disturbing activities, and due to the cultural sensitivity of the Study Area, there is potential for unanticipated discovery of human remains during Project-related ground-disturbing activities. As such, **Mitigation Measure MM 3.6-3** (Unanticipated Discovery of Human Remains) would be implemented to reduce impacts to less than significant. **Mitigation Measure MM 3.6-3** requires CVWD to comply with California Health and Safety Code Section 7050.5, including immediately halting construction activities and notifying the County Coroner's office upon discovery of human remains.

The Modified Project would also be constructed in areas that have been previously disturbed and developed, and similar to the Approved Project would not be anticipated to encounter human remains. However, construction would involve ground-disturbing activities, and given the cultural sensitivity of the Study Area, there is potential for unanticipated discovery of human remains, similar to the Approved Project. As such, **Mitigation Measure MM 3.6-3** would be required to reduce impacts to less than significant. No new impacts would occur, and no new mitigation would be required.

Mitigation Measures

To mitigate possible impacts to cultural resources during construction and operation, CVWD shall implement **Mitigation Measures MM 3.6-2a, MM 3.6-2b, and MM 3.6-3** (listed below) which were previously adopted for the Approved Project. The impacts of the Modified Project are the same as the Approved Project: less than significant with mitigation incorporated. No new mitigation is required for the Modified Project.

- **Mitigation Measure MM 3.6-2a Archaeological and Native American Monitoring.** CVWD shall retain a qualified archaeological and Native American monitor to be present during ground disturbing activities such as grading, trenching, or excavation within the vicinity of CA-SBA-7 (the AWPf and directly adjacent conveyance pipelines). Archeological monitoring shall be performed during initial ground disturbance only (not entire construction timeframe) under the direction of an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archeology (National Park Service, 1983). Native American monitoring should be provided by a locally affiliated tribal member. Monitors shall have the authority to halt and redirect work should any archaeological resources be identified during monitoring. If archaeological resources are encountered during ground-disturbing activities, work in the immediate vicinity area must halt and the find evaluated for listing in the California Register and National Register of Historic Places. Archaeological or Native American monitoring or both may be reduced or halted at the discretion of the monitors, in consultation with CVWD, as warranted by conditions such as encountering bedrock, sediments being excavated are fill, or negative findings during the first 60% of rough grading. If monitoring is reduced to spot-checking, spot-checking shall occur when ground-disturbances move to a new location within the project site and when ground disturbance will extend to depths not previously reached (unless those depths are within bedrock).
- **Mitigation Measure MM 3.6-2b Unanticipated Discovery of Cultural Resources.** If cultural resources are encountered during ground-disturbing activities, work in the immediate area must halt and an archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for archaeology (National Park Service 1983) shall be contacted immediately to evaluate the find. If the discovery proves to be significant under the NHPA and/or CEQA, additional work such as data recovery excavation and Native

American consultation shall occur, as necessary, to mitigate any significant impacts or adverse effects.

- **MM 3.6-3 Unanticipated Discovery of Human Remains.** In the event of an unanticipated discovery of human remains, the County Coroner shall be notified immediately, and no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to PRC Section 5097.98 in accordance with California Health and Safety Code Section 7050.5. If the human remains are determined to be prehistoric, the coroner will notify the Native American Heritage Commission, which will determine and notify a most likely descendant. The most likely descendant has 48 hours from being granted access to the site to make recommendations for the disposition of the remains. If the most likely descendant does not make recommendations within 48 hours, the landowner shall reinter the remains in an area of the property secure from subsequent disturbance.

3.7 Energy

As explained in *Section 1.4 Evaluation of Environmental Impacts*, all topics under Energy were found to have No Impact or Less than Significant Impact in the EIR, and the finding would not change under the Modified Project.

The Modified Project would be constructed using the same or substantially similar construction methods as the Approved Project, would have the same overall number of wells and components, and would have the same operations and maintenance activities as the Approved Project. Therefore, the Modified Project would have the same findings of Less than Significant Impacts for Energy as the Approved Project.

Mitigation Measures

None required or recommended.

3.8 Geology and Soils

As explained in *Section 1.4 Evaluation of Environmental Impacts*, this analysis only discusses checklist questions 3.8-1.ii, 3.8-1.iii, 3.8-3, 3.8-4, and 3.8-6, because the other topics under Geology and Soils were found to be No Impact or Less than Significant Impact for the Approved Project and the finding would not change under the Modified Project.

Southern California is known to be seismically active. The Approved Project is located near the Carpinteria Fault and Rincon Creek Fault, which trend toward the southwest end of the Study Area. Both of these faults are inactive, concealed faults, though the City considers the faults to be potentially active for planning purposes. Two additional potentially active faults are located within two miles of the Study Area to the north-northeast. The Approved Project is therefore at risk of strong seismic ground shaking (checklist question 3.8-1i).

The Approved Project is in an area identified as susceptible to liquefaction (checklist question 3.8-1iii). The Approved Project is in a generally level area and is not anticipated to destabilize soils that would result in landslides. Potential impacts from lateral spreading, subsidence, liquefaction, or expansive soils (checklist questions 3.8-3 and 3.8-4).

Although the Approved Project would be designed in compliance with applicable standards and codes to protect against impacts of seismic ground shaking, **Mitigation Measure MM 3.8-1** (Geotechnical Analysis) has been included to further reduce seismic and soil impacts to less than significant.

Mitigation Measure MM 3.8-1 includes the development of a geotechnical report for the injection wells monitoring wells, and conveyance pipeline sites to determine the appropriate design features to include in the Approved Project facilities. This mitigation measure addresses potential earthquake faults and ground shaking as well as liquefaction; the entire Study Area is in soils vulnerable to earthquake-induced liquefaction, and the Approved Project therefore has the potential to expose people or structures to earthquake-induced liquefaction. Soil testing would be conducted prior to final selection of the injection and monitoring well sites and the potential for soil expansion would be considered in the site selection process. Compliance with applicable design and construction standards would likely reduce potential impacts associated with exposure to earthquake-induced liquefaction, however there would remain potentially significant impacts. **Mitigation Measure MM 3.8-1** reduces potential impacts to less than significant by requiring soils testing/surveys and protective measures in areas with liquefaction potential or expansive soils.

The Study Area does not fall with the areas designated as having a high landslide potential in the City's *General Plan/Local Coastal Land Use Plan*. Additionally, as aforesaid, the Approved Project would comply with design standards and would not result in an increased risk of landslides within the Study Area. As such, the Approved Project would not result in significant impacts related to landslides.

The Modified Project would be subject to the same risk of structural damage or loss due to seismic ground shaking as the Approved Project because the Modified Project would be located within the same Study Area. The Modified Project facilities would also be constructed using the same standards and guidelines as those in the Approved Project. As with the Approved Project, **Mitigation Measure MM 3.8-1** would apply. Therefore, no new impact related to seismic ground shaking, ground failure or liquefaction, landslides, expansive soils, or soil instability would occur from the Modified Project, and no new mitigation would be required.

3.8-6) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature

There is low paleontological sensitivity in the Approved Project area between 0 and 15 feet below ground surface (bgs) due to the young age of the soils at these depths at the project site. Impacts on paleontological resources at these depths would therefore not be

expected. Excavation for the Approved Project's conveyance pipelines would all remain above the 15-foot threshold, and therefore would have no impact on paleontological resources.

There would be a high potential for impacts to paleontological resources if the Approved Project excavates deeper than 15 feet bgs. Excavation at the AWPf site would reach a maximum depth of 20 feet bgs, however, previous excavation activities across the WWTP site have disturbed the sediments to an estimated depth of 21 feet bgs. Well drilling would extend beyond 15 feet bgs, but these activities would have negligible impacts on paleontological resources or unique geologic features because the well drill auger has a small diameter which would limit disturbances to intact Pleistocene sediments. As a result, significant impacts to paleontological resources are not anticipated.

To ensure proper procedures are in place in the event of an unanticipated fossil discovery, **Mitigation Measure MM 3.8-6** (Fossil Discovery, Preparation, and Curation) would be implemented during all construction phases of the Project and would ensure that any unanticipated fossils present on site are preserved. With implementation of **Mitigation Measure MM 3.8-6**, the potential impacts on paleontological resources from the Approved Project would be less than significant.

The Modified Project would be construction in the same locations as the Approved Project, using the same or substantially similar construction methods. **Mitigation Measure 3.8-6** would still apply. As a result, no new paleontological resource impacts would occur with the Modified Project and no new mitigation would be required.

Mitigation Measures:

To mitigate possible impacts to geology and soils and paleontological resources during construction and operation, CVWD shall implement **Mitigation Measures MM 3.8-1** and **MM 3.8-6** (listed below) which were previously adopted in the EIR for the Approved Project. The impacts of the Modified Project are the same as the Approved Project: less than significant with mitigation incorporated. No new mitigation is required for the Modified Project.

- **MM 3.8-1 Complete a Geotechnical Analysis, Assess Potential for Liquefaction and Expansive Soils and Incorporate Protective Measures.** All of the Proposed Project's components would be located within an area of high expansive soils or an area at risk for liquefaction. During design for all project components, CVWD shall complete an engineering geotechnical and soils report that assesses potential for seismic-related risks and liquefaction. CVWD shall incorporate protective measures as necessary, based on the findings of the geotechnical and soils report. Pipelines shall be installed within consolidated engineered backfill. Protective measures may include the use of specific materials (e.g., PVC instead of cement pipes), design features such as thickness of pipes or foundations, methods that comply with standards and regulations for areas with potential for liquefaction, or selection of materials resistant to the effects of liquefaction.

- **MM 3.8-6 Fossil Discovery, Preparation, and Curation.** In the event an unanticipated fossil discovery is made during the course of the project development, then in accordance with SVP (2010) guidelines, a qualified professional paleontologist should be retained in order to examine the find and to determine if further paleontological resources mitigation is warranted. The paleontologist shall have the authority to temporarily direct, divert or halt construction activity to ensure fossil(s) can be assessed for scientific significance and if necessary, removed in a safe and timely manner. Once salvaged, significant fossils shall be identified to the lowest possible taxonomic level, prepared to a curation-ready condition and curated in a scientific institution with a permanent paleontological collection (such as the Natural History Museum of Los Angeles County) along with all pertinent field notes, photos, data, and maps.

3.9 Greenhouse Gas Emissions

As explained in *Section 1.4 Evaluation of Environmental Impacts*, all topics under Greenhouse Gas Emissions were found to have No Impact or Less than Significant Impact for the Approved Project, and the finding would not change under the Modified Project.

The Modified Project would result in similar overall excavation as the Approved Project. All assumptions used for the greenhouse gas emissions analysis conducted via CalEEMod would remain the same because the Modified Project would use the same or similar construction methods and there are no substantial changes to the length of pipeline to construct. Therefore, there would be no new greenhouse gas emission impacts as a result of the Modified Project and no new mitigation would be required.

Mitigation Measures

None required or recommended.

3.10 Hazards and Hazardous Materials

As explained in in *Section 1.4 Evaluation of Environmental Impacts*, this analysis only discusses checklist questions 3.10-1, 3.10-2, 3.10-3, 3.10-4, 3.10-6, and 3.10-7, because the other topics under Hazards and Hazardous Materials were found to be No Impact or Less than Significant Impact for the Approved Project and the finding would not change under the Modified Project.

During construction of the Approved Project, construction machinery and associated chemicals (e.g. gasoline, diesel fuel, hydraulic fluids, paint) would be required. During operation, chemicals would be routinely used, stored, and delivered for the treatment/blending facility (e.g. cleaning and degreasing solvents, sodium hypochlorite, ammonium hydroxide, antiscalant, etc.) (checklist question 3.10-1). These activities would temporarily increase the routine transport and use of hazardous materials commonly used in construction activities, which has the potential to result in release of hazardous materials through reasonably foreseeable upset or accident conditions during both construction and operation of the Approved Project (checklist question 3.10-2).

There are six public elementary, middle, and high schools located within the Study Area, and three pre-schools. As shown in Table 3.10-1 and Figure 3.10-1 of the EIR, these nine schools are all located within one-quarter mile of the Approved Project. Although construction activities for the Approved Project would be conducted in compliance with all applicable regulations for the transport, storage, use, and disposal of hazardous materials and precautions would be taken to reduce potential risks, there is potential for an accidental release of hazardous materials, as discussed under Impact 3.10-2. Given the proximity of these schools to the Approved Project, there is potential that such an accidental release could occur within one-quarter mile (1,320 feet) of an existing or proposed school (checklist question 3.10-3).

The routine use of hazardous materials during construction and operation of the Approved Project, along with the risks of accidental release of hazardous materials, would be minimized through compliance with existing federal, State and local regulations, which were identified in the EIR, along with compliance with appropriate BMPs. To further minimize potential impacts of hazards and hazardous materials transported, used, or disposed of for the project, **Mitigation Measures MM 3.10-1a** (Preparation of Hazardous Materials Business Plan) and **MM 3.10-1b** (Hazardous Materials Management and Spill Prevention and Control Plan) would be implemented, which require the amendment of existing, and creation of additional, plans for hazardous materials onsite for the AWPf and construction phase, consecutively, along with establishing procedures for preventing construction-related accidents and handling potential accidents. With conformance to appropriate regulations, BMPs, and mitigation measures, the EIR found impacts related to hazards and hazardous materials would be less than significant for the Approved Project.

Under the Modified Project, the use of construction machinery and chemicals during construction would be the same as for the Approved Project because the same or substantially similar construction methods would be used, and no changes to operations would be required. The relocation of monitoring wells and modifications to the flood gate and the flood wall would not substantially change routine use of hazardous materials during construction. The Modified Project would be located within the same Study Area as the Approved Project, and therefore would be located within a quarter mile of the same schools identified under the Approved Project. CVWD would be required to be in compliance with all applicable federal, State, and local regulations pertaining to hazardous materials and would use appropriate BMPs in addition to implementing **Mitigation Measures MM 3.10-1a** and **MM 3.10-1b**, and impacts would be less than significant. Therefore, no new impacts would occur for the Modified Project related to routine transport, use, or disposal of hazardous materials and no new mitigation would be needed.

3.10-4) 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

The EIR identified 23 hazardous waste sites, including three active sites and four closed cases at the WWTP site, present within a quarter mile radius of the Approved Project's Study Area using records searches of the State Water Resources Control Board's GeoTracker and the Department of Toxic Substances Control's EnviroStor. These sites are detailed in the EIR. Well Site #6 and the Southern Potential Pipeline Alignment along 6th Street at Linden Avenue are located adjacent to two of the active sites. If Well Site #6 or the Southern Potential Pipeline Alignment along 6th Street at Linden Avenue are selected for the project, impacts would be potentially significant and mitigation to reduce exposure impacts to construction workers and the adjacent population, including a Phase I Environmental Site Assessment, may be required. **Mitigation Measure MM 3.10-4** (Contingency Plan for Contaminated Soil and/or Groundwater) was adopted as part of the Approved Project to reduce the potential to expose people or the environment to hazardous materials through excavation and earth-disturbing activities on or adjacent to hazardous materials sites. With the implementation of **Mitigation Measure MM 3.10-4**, impacts would be less than significant.

The Modified's Project change to the location of the monitoring well cluster to Well Site #6 would not change the overall locations evaluated for the Approved Project. Because a monitoring well cluster would be located at Well Site #6 under the Modified Project, **Mitigation Measure MM 3.10-4** still applies and would be implemented as part of the Modified Project if Well Site #6 is selected as final project locations. The implementation of this mitigation measure would reduce potential impacts to less than significant, consistent with the Approved Project. Therefore, no new impacts would occur as part of the Modified Project and no new mitigation would be required.

3.10-6) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan

Construction of the Approved Project would temporarily alter, block, or impair roads such that they could conflict with the adopted emergency response plan and emergency evacuation plan. Coordination with local emergency responders would be required regarding lane closures. Implementation of **Mitigation Measure MM 3.18-1** (Transportation Management Plan) would require preparation of a Transportation Management Plan and would address how the City would communicate with emergency response agencies to develop emergency access strategies. With the implementation of **Mitigation Measure MM 3.18-1**, potential impacts would be reduced to less than significant levels. Over the long term, the Approved Project does not have any characteristics that would physically impair or otherwise interfere with emergency response or evacuation in the Study Area. Therefore, with implementation of mitigation measures, impacts would be less than significant for the Approved Project.

The Modified Project does not change the location of proposed construction activities, though it does change the construction at Well Site #6 from injection well construction to

monitoring well cluster construction. Because it does not change the location of construction activities, nor does it involve the use of substantially different construction equipment or methods, it would not change the overall number or location of roads that could experience temporary closures during construction. Modifications to the gate at the CSD's WWTP site will need to provide temporarily access around the construction activities associated with the flood barrier as to not interfere with CSD operations and with CSD's adopted emergency response plan. CSD will continue to operate during construction. Large chemical deliveries and solids removal trucks may need to be altered during construction. Site access will be retained for employees, construction activities onsite and for emergency vehicles. Impacts associated with lane closures on emergency access would be the same or substantially similar as the Approved Project. As with the Approved Project, any lane or road closures would temporarily alter, block, or impair roads such that they would conflict with the adopted emergency response plan and emergency evacuation plan. Coordination with local emergency responders would be required regarding lane closures. Similarly, **Mitigation Measure MM 3.18-1** shall be required for the Modified Project. As with the Approved Project, all disturbances associated with the Modified Project would be assessed for potential to interfere with an adopted emergency response or emergency evacuation plan (and with traffic generally). CVWD would be responsible for coordinating with emergency services, creating a Transportation Management Plan, and minimizing the duration of closures to roadways and critical access points for emergency services under the adopted **Mitigation Measure MM 3.18-1**. As with the Approved Project, impacts would be reduced to less than significant with implementation of the described mitigation measure. Therefore, there would be no new impacts, and no further mitigation measures would be required.

3.10-7) Expose people or structures either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires

The majority of the City of Carpinteria is located within a Very High Fire Hazard Safety Zone under the CalFire Fire Hazard Severity Zone Mapping, though the City's *General Plan/Local Coastal Land Use Plan* Safety Element designates the portion of the City that includes the Study Area as a Low Fire Hazard Zone. To minimize the risk of wildfire from construction activities, **Mitigation Measure MM 3.10-7** (Construction Equipment and Staging Area BMPs) would be implemented under the Approved Project, which includes BMPs for construction equipment and staging areas that would minimize the risk of wildfire to less than significant. The AWPf is within a debris flow risk area with indirect fire-related impacts possible. The EIR found, however, that constructing the facility and associated appurtenances in compliance with applicable building and design standards and maintaining the walled structure around the WWTP site that houses the AWPf would reduce potential impacts from indirect wildfire risks to less than significant without further mitigation.

The Modified Project would be located within the same Study Area as the Approved Project, and would be subject to the same wildfire related risks as the Approved Project. No part of the Modified Project changes the determinations made in the EIR regarding risk of direct or indirect impact from wildfire as all portions of the project remain in the

same localities designated as Low Fire Hazard Zone and debris flow risk areas. The Modified Project would maintain compliance with applicable building and design standards, a wall around the AWPf would remain, and **Mitigation Measure MM 3.10-7** would be implemented as part of the Modified Project reducing potential impacts would be less than significant. Therefore, no new impact would occur, and no new mitigation would be required.

Mitigation Measures:

To mitigate unanticipated exposure to hazards, hazardous materials, and physical interference with evacuations and emergencies during construction and operation, CVWD shall implement **Mitigation Measures MM 3.10-1a, MM 3.10-1b, MM 3.10-4, and MM 3.10-7** (listed below), and **Mitigation Measure MM 3.18-1** (listed in *Section 3.18 Transportation*) which were previously adopted in the EIR for the Approved Project. Impacts of the Modified Project are the same as the Approved Project: less than significant with mitigation incorporated. No new mitigation is required for the Modified Project.

- **MM 3.10-1a Preparation of Hazardous Materials Business Plan.** CSD shall amend its existing Hazardous Materials Business Plan (HMBP) for the WWTP to address the addition of the AWPf and pump station. The HMBP shall include, at a minimum, an updated hazardous materials inventory, site plan, emergency response plan, and requirements for employee training. The HMBP shall be amended prior to the use and storage of chemicals during construction or operation of the Proposed Project. The HMBP shall inform staff and contractors of the chemicals that may be used at the site and how to respond to potential hazardous material emergencies or exposure. CSD shall confirm training and signage included in the HMBP are completed and posted at the AWPf and associated chemical storage. CSD shall confirm that the hazardous materials inventory is consistent with chemicals ordered by contractors during construction and by CSD for operation and maintenance of the AWPf, pump station, and associated facilities.
- **MM 3.10-1b Hazardous Materials Management and Spill Prevention and Control Plan.** Before construction begins, CVWD and/or CSD shall require its construction contractor to prepare a Hazardous Materials Management Spill Prevention and Control Plan that includes a project-specific contingency plan for hazardous materials and waste operations. The Plan will be applicable to construction activities and will establish policies and procedures according to applicable codes and regulations, including but not limited to the California Building and Fire Codes, and federal and California Occupational Safety and Health Administration (Cal/OSHA) regulations, to minimize risks associated with hazardous materials spills. Elements of the Plan will include, but not be limited to the following:

- A discussion of hazardous materials management, including delineation of hazardous material storage areas, access and egress routes, waterways, emergency assembly areas, and temporary hazardous waste storage areas;
 - Notification and documentation of procedures; and
 - Spill control and countermeasures, including employee spill prevention/response training.
- **MM 3.10-4 Contingency Plan for Contaminated Soil and/or Groundwater.** If Well Site #6 or the Southern Potential Pipeline Alignment along 6th Street at Linden Avenue are selected as components of the Proposed Project, CVWD shall conduct a Phase I Environmental Site Assessment to evaluate the potential for contaminated soils within the Project footprint. If the Phase I Environmental Site Assessment is positive, CVWD shall conduct soils testing prior to excavation activities in those sites to evaluate the risk of encountering contaminated soils. If soils testing finds contaminated soils or groundwater, construction will be halted in the area and the type and extent of the contamination shall be evaluated. CVWD will develop a contingency plan to dispose of contaminated soils or groundwater through consultation with appropriate regulatory agencies prior to continuation of work. The contingency plan may include, but not be limited to, a plan for safe handling of contaminated soils, a description of the required personal protective equipment for workers during excavation of contaminated soils, and identification of proper disposal sites and methods. CVWD will designate a monitor to confirm compliance with the contingency plan during excavation activities in the contaminated area.
 - **MM 3.10-7 Implement Construction Equipment and Staging Area BMPs.** CVWD and CSD contractors shall be required to clear construction staging areas of dried vegetation and other material that could ignite, and store equipment that heats up only in cleared areas. CVWD and CSD contractors shall be required to keep all construction equipment in good working order and equipped with spark arrestors to prevent potential sparks. CVWD and CSD shall require its contractors to use a spotter during welding activities, and fire extinguishers would be made available at all construction sites. Confirmation of these practices will be made by CVWD or CSD staff or their designated representative through periodic site visits.

3.11 Hydrology and Water Quality

As explained in in Section 1.4 Evaluation of Environmental Impacts, this analysis only discusses checklist question 3.11-1, because the other topics under Hydrology and Water Quality were found to be No Impact or Less than Significant Impact for the Approved Project and the finding would not change under the Modified Project.

Construction of the Approved Project would comply with the SWRCB's NPDES General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit) (Order 2009-0009-DWQ) which requires preparation and implementation

of a SWPPP to control erosion, sediment and other construction-related pollutants in storm water discharges during project construction. Discharges of treated water from the WWTP are covered under the CSD's NPDES permit for the CSD WWTP (Order R3-2017-0032, Permit CA0047364). Compliance with this permit reduces water quality impacts resulting from discharge of recycled water by setting effluent limitations and discharge specifications for the CSD WWTP and requiring CSD to comply with the Monitoring and Reporting Program and to visually inspect the ocean outfall and diffuser structure at least once per year. This permit would be updated to reflect the new CAPP components. Compliance with this permit would ensure potential water quality impacts at the ocean outfall from operation of the AWPf would be less than significant. The post-construction stormwater runoff requirements of the Municipal Separate Storm Sewer System (MS4) permit (Order R3-203-0032) would apply to the injection well sites and work completed at the WWTP site, both of which would exceed the impervious surface thresholds that trigger the policy.

The Approved Project would be issued a WDR for injection of advanced treated wastewater into the Carpinteria Groundwater Basin. The permit would be based on Title 22 CCR Division 4, Chapter 3, *Water Recycling Criteria*, which establishes regulations for groundwater replenishment reuse projects, and specifically Article 5.2, *Indirect Potable Reuse: Groundwater Replenishment – Subsurface Application*. Compliance with these requirements would result in less than significant impacts to groundwater quality.

The Approved Project would alter the quality and volume of water discharged through the ocean outfall, releasing a higher concentration of salinity than is currently discharged by the WWTP. A Dilution Study, included as Appendix J to the EIR, found that changes to the brine discharge would have a less than significant impact to water quality related to salinity of the water column.

The Approved Project would not adversely affect drinking water sources because it would not be constructed near existing water supply sources or storage facilities, other than groundwater, and the use of advanced purified water would not degrade groundwater quality as discussed above.

The City's Environmental Compliance Guidelines also consider a water quality impact significant if it would significantly impact biological communities. As discussed in *Section 3.4, Biological Resources*, construction activities could result in potential impacts to water quality in Franklin Creek and Carpinteria Creek, and **Mitigation Measures MM 3.4-3a** (Disturbance Area and Staging), **MM 3.4-3b** (Material Storage), **MM 3.4-3c** (Construction Best Management Practices) would be implemented to minimize disturbances that could result in sediments in the creeks, trash entering waterways, and water quality impacts from runoff and spills/leakage. Impacts would be less than significant with mitigation incorporated.

The Modified Project would be constructed using the same or substantially similar construction methods as the Approved Project, be located in the same areas as the Approved Project and would have the same operations and maintenance activities as the Approved Project. The Modified Project would generate the same average volume of

water as the Approved Project and be operated in the same manner, and would have the same less-than-significant impact on groundwater as the Approved Project. As with the Approved Project, no mitigation would be required related to potential groundwater quality impacts. Under the Modified Project, there would be no changes to ocean outfall elements of the Approved Project, as they have already been completed, and thus no changes in impacts or mitigation. Potential construction impacts on water quality in Franklin Creek and Carpinteria Creek would be similar to the Approved Project, because the Modified Project would be in the same location and include the same construction activities as the Approved Project. Therefore, the approved **Mitigation Measures MM 3.4-3a, MM 3.4-3b, and MM 3.4-3c** would be required for the Modified Project. As with the Approved Project, the Modified Project would have a less than significant impact with incorporation of mitigation. Therefore, no new impact would occur, and no new mitigation would be required.

Mitigation Measures:

To mitigate potential impacts to hydrology and water quality, CVWD shall implement **Mitigation Measures MM 3.4-3a, MM 3.4-3b, and MM 3.4-3c** (listed in Section 3.4 Biological Resources) which were previously adopted in the EIR for the Approved Project. Impacts of the Modified Project are the same as the Approved Project: less than significant with mitigation incorporated. No new mitigation is required for the Modified Project.

3.12 Land Use and Planning

As explained in in Section 1.4 Evaluation of Environmental Impacts, this analysis only discusses checklist question 3.12-2, because the other topics under Land Use and Planning were found to be No Impact or Less than Significant Impact in the EIR and the finding would not change under the Modified Project.

The Approved Project would not conflict with any applicable policies, plans, or regulations. The AWPf is subject to a height restriction of 30 feet which the City implements on structures in areas zoned for utilities, and the maximum height of the facilities would reach 27 feet (equalization tank), with the AWPf process building having a height of 20 feet. All Approved Project facilities are designed to remain outside of the 50-foot setback from creeks per City and County policy, and any activities occurring within 50 feet of the creek are recognized in the EIR as requiring a Coastal Commission exemption and/or amendment to the City's Local Coastal Program. The Approved Project would additionally obtain a Coastal Development Permit from the City because the entire City is within the Coastal Zone.

The conveyance and backflush pipelines would be located underground, and generally within the roadway ROWs and in locations designated for public infrastructure. They would therefore be consistent with applicable land use plans, policies, and regulations of agencies with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect. Easements would be acquired as necessary, and once

installed, conveyance and backflush pipelines would not affect aboveground land use, nor would they conflict with applicable land use plans, policies, or regulations.

CVWD would schedule construction to reduce interference with community needs, including timing construction to avoid disruption of church services, community events, and school schedules. Coordination with property owners would occur, and although some parking may be temporarily unavailable during construction, the Approved Project would not result in a violation of the parking requirements for the properties. The Approved Project would avoid potential impacts and conflicts to applicable policies and plans through proper planning and design. Impacts would therefore be less than significant. Construction of injection wells would create temporary noise and transportation impacts that could temporarily interfere with existing land uses, but implementation of **Mitigation Measures MM 3.14-1** (Noise Control Measures to Reduce Construction Noise), and **MM 3.18-1** (Transportation Management Plan) would reduce these temporary impacts to less than significant.

The Modified Project would be located within the same areas as the Approved Project and involve the same types of facilities and activities. It would therefore be subject to the same zoning and permitting requirements. Therefore the Modified Project would have the same or similar impact on land use as the Approved Project, and **Mitigation Measures MM 3.14-1** (Noise Control Measures to Reduce Construction Noise), and **MM 3.18-1** (Transportation Management Plan) would be required to reduce potential impacts to less than significant. There would be no new impacts as a result of the Modified Project and no new mitigation would be required.

Mitigation Measures:

Mitigation Measures MM 3.14-1a relating to noise (and listed in *Section 3.14, Noise*), and **Mitigation Measure MM 3.18-1** relating to transportation (and listed in *Section 3.18 Transportation*) shall apply to construction of injection and monitoring wells that generate noise, vibration, or transportation impacts that substantially interfere with existing residential uses. Impacts of the Modified Project are the same as the Approved Project: less than significant with mitigation incorporated. No new mitigation is required for the Modified Project.

3.13 Mineral Resources

As explained in *Section 1.4 Evaluation of Environmental Impacts*, all topics under Mineral Resources were found to have No Impact or Less than Significant Impact in the EIR, and the finding would not change under the Modified Project.

Mitigation Measures

None required or recommended.

3.14 Noise

As explained in in Section 1.4 Evaluation of Environmental Impacts, this analysis only discusses checklist questions 3.14-1 and 3.14-2, because the other topics under Noise were found to be No Impact or Less than Significant Impact for the Approved Project and the finding would not change under the Modified Project.

Most of the well construction, pipeline construction, and AWPf construction under the Approved Project would occur during daytime hours as allowable per City noise standards. Twenty-four-hour drilling would be needed for injection wells, however, which would primarily involve the use of a rotary drill rig. Drilling of the injection wells could span up to three weeks of 24-hour construction. The nearest residential receptors could be as close as 25 feet away from the rotary drill rig during 24-hour well construction and would exceed the temporary construction noise standards. Similar to injection wells, monitoring well construction, which would involve the use of a rotary drill rig, flat-bed trucks, jackhammers, and forklifts, may require 24-hour drilling and may be located within residential roadways, near other residential properties, or near other sensitive receptors. Some equipment likely to be used during construction of the AWPf and associated facilities at the WWTP site would also have short-term noise levels that exceed standards, such as jack hammers or compactors, both of which generate noise levels over 80 dBA at 50 feet.

These impacts would be reduced to a less-than-significant level with the implementation of **Mitigation Measure MM 3.14-1** (Noise Control Measures to Reduce Construction Noise), which requires that CVWD and its contractor implement construction noise reduction measures. Under **Mitigation Measure MM 3.14-1**, the use of sound walls and sound blankets would be required as necessary so that construction activity noise can stay within the City's allowable noise thresholds, and residents that are located within 500 feet of construction activities would be notified. This mitigation measure also prohibits truck and equipment idling, requires that accommodations be provided to residents living within 100 feet of nighttime drilling where noise levels cannot be feasibly limited to 75 dBA at the property line, and requires special scheduling around school and church events, among other measures.

Operational noise from the Approved Project would be generated by the pump station, and equipment at the injection wells and AWPf, though noise would be shielded by distance from sensitive receptors, enclosure of the pump station, and the presence of buildings and structures between the equipment and receptors. Operation of pipelines would not result in significant noise because they would be located underground. The injection wells would generate some noise from their backflush pumps. The EIR determined the noise from the backflush pumps would be a maximum of 69 dBA Leq due to their location within the underground portion of the injection well vault but noted that noise from the pumps is expected to be imperceptible. Ambient noise levels adjacent to the injection well sites are not expected to substantially increase as a result of Approved Project operations. Operational noise levels are not anticipated to create a significant noise impact for neighboring properties and sensitive receptors. The location of noise-

generating equipment is such that noise would be attenuated by their enclosures and any slight increase in ambient noise levels would be less than significant.

The Modified Project would include the same sources of noise generation as the Approved Project for both construction and operation because the Modified Project would construct the same number and type of noise generating facilities as the Approved Project, using the same or substantially similar methods for the same durations. The Modified Project would expand the potential monitoring well locations, to include Well Site #6. The proposed location at Well Site #6 would be approximately 100 feet from the nearest residence, further from the nearest residence than the monitoring wells would have been if located on Meadow View Lane as in the Approved Project. The Modified Project does not change the distance of the injection wells or other monitoring well clusters from residences from that in the Approved Project. Noise generating impacts would therefore be the same or substantially similar as the Approved Project, and implementation of **Mitigation Measure MM 3.14-1** would be required.

With implementation of **Mitigation Measure MM 3.14-1**, noise impacts of the Modified Project would be reduced to less than significant. Therefore, no new impact would occur, and no new mitigation would be required.

3.14-2) Generation of excessive groundborne vibration or groundborne noise levels

The Approved Project would use construction equipment that would generate vibration. Caltrans' Transportation and Construction Vibration Guidance Manual indicates vibrations at 0.035 PPV and higher are distinctly perceptible by humans, and become disturbing at 0.17 PPV. The majority of construction equipment would generate vibration that would be perceptible at 25 feet, though only the vibratory roller and impact pile driver would be "disturbing" at 25 feet. The EIR found the Approved Project has the potential to generate temporary groundborne vibration during construction that could be perceptible to humans, and required **Mitigation Measure MM 3.14-1** (Noise Control Measures to Reduce Construction Noise) be implemented to ensure that construction-related vibration does not exceed applicable thresholds. With implementation of **Mitigation Measure MM 3.14-1**, the Approved Project would not expose persons to or generate excessive groundborne vibration or groundborne noise levels and impacts would be reduced to a less than significant level.

The Modified Project would use the same construction equipment as the Approved Project. Because it would use the same equipment and construct the same facilities as the Approved Project, it would therefore generate similar vibrations. The Modified Project would move the monitoring well cluster that was proposed for Meadow View Lane under the Approved Project further from residences, so vibrations from construction of that monitoring well cluster would have less potential to be felt at residences than if it were in Meadow View Lane. However, the Modified Project does not change the distance of the injection wells or other monitoring well clusters from residences or structures, so the overall impacts would be the same or similar as the Approved Project. Groundborne vibration attenuates quickly, and none of the equipment used for the construction of injection wells or monitoring wells would exceed the threshold for being "disturbing" at 25

feet, and therefore would not be disturbing at 50 or 55 feet. Because vibrations have the potential to be at a perceptible level, **Mitigation Measure MM 3.14-1** would be implemented to ensure that construction-related vibration does not exceed applicable thresholds. With incorporation of the previously adopted Mitigation Measures for the Approved Project, impacts would remain less than significant. Therefore, no new impact would occur as a result of the Modified Project and no new mitigation would be required.

Mitigation Measures:

To mitigate impacts related to noise, CVWD shall implement **Mitigation Measures MM 3.14-1** (listed below) which were previously adopted for the Approved Project. Impacts of the Modified Project are the same as the Approved Project: less than significant with mitigation incorporated. No new mitigation is required for the Modified Project.

- **MM 3.14-1a. Noise Control Measures to Reduce Construction Noise.** In order to comply with the affected City and County Municipal Codes and noise ordinances, CVWD's and CSD's construction contractors shall implement the following measures:
 - **Limit Construction Hours:** Construction hours shall be limited to times authorized under the City and County Municipal Codes and as allowed by applicable permits. Within For the City of Carpinteria, noise-generating construction will be is limited to the hours of 7:00 a.m. to 8:00 p.m. 5:00 p.m. Monday through Friday, and prohibited on Saturday and Sunday, unless otherwise necessary. 8:00 a.m. to 8:00 p.m. on Saturday, and 10:00 a.m. to 8:00 p.m. on Sunday. Non-noise generating project activities, including but not limited to equipment maintenance, refueling, preparations, and on-site meetings, would not be subject to these time limits unless otherwise specified in applicable permits. After-hours permits may be acquired if determined that it is required and serves the public interest. For the County of Santa Barbara, construction-related noise is restricted between 10:00 p.m. and 7:00 a.m. Sunday through Thursday, and midnight and 7:00 a.m. Friday and Saturday to levels less than 60 dB at the edge of the property line, or those that are not clearly discernable 100 feet from the property line.
 - **After-Hours Construction:** If construction outside of the City and County restricted hours is required, CVWD and CSD shall obtain CUP approval for such activities prior to initiation of construction. For each site requiring after-hours construction within 1,000 feet of residential areas, CVWD or its contractor shall install a temporary sound wall barrier around the site of construction activities. The sound wall barrier shall be 24 feet in nominal height with blanketed wall panels having a minimum sound transmission class rating of 25 to mitigate noise levels to less than 75 dBA CNEL at the property line of the receptor. Sound levels shall be continuously monitored throughout construction activities to ensure adequate noise reduction.

- **Construction at St. Joseph's Church:** Where construction permits allow construction on Sundays, drilling of the injection well at Well Site #3 shall be temporarily halted during Mass on Sundays. Drilling may resume between mass times as determined necessary by the drilling contractor to maintain integrity of the borehole. Sunday Mass times are scheduled at 7:00 a.m., 9:00 a.m., 11:00 a.m., and 5:30 p.m. and last for approximately 1 hour. Construction contractor shall coordinate with St. Joseph's Church staff on specific times drilling will stop and recommence on Sundays to avoid drilling during Sunday Mass. Specific Sunday Mass hours provided by St. Joseph's Church staff shall take precedence over the times listed here.
- **Equipment Location and Shielding:** CVWD and CSD shall require its contractors to locate stationary noise-generating construction equipment such as air compressors and generators as far as possible from homes and businesses within the City of Carpinteria. At the well sites, the contractor shall install a temporary sound barrier between the construction site and potential sensitive receptors such as residential areas or schools during construction to mitigate elevated noise levels. Sound barriers may include sound blankets or sound walls, or other appropriate features. The final selection of noise barriers will be reviewed and approved by CVWD and the City during the CUP approval process.
- **Temporary Housing during After-Hours Construction:** For residences within 100 feet of nighttime drilling where sound attenuation may be unable to reduce noise levels to 75 dBA at the property line, CVWD may temporarily provide alternative housing (e.g., hotel accommodations) for those residents who request such accommodations and whose properties fall within areas where after-hours construction noises cannot feasibly be mitigated to less than 75 dBA
- **Locate Staging Areas away from Sensitive Receptors:** The contractor shall select construction staging areas as far as feasibly possible from sensitive receptors. Prior to construction, the construction contractor shall identify and receive approval of the construction staging areas from the City of Carpinteria Public Works Department via written approval from a City engineer.
- **Install and Maintain Mufflers on Construction Equipment in Excess of 85 dBA:** Construction equipment that generates noise in excess of 85 dBA at 100 feet shall be fitted with mufflers to reduce noise to less than 85 dBA when measured 100 feet from the equipment. CVWD and CSD shall require the contractor to maintain construction equipment with specified noise-muffling devices to achieve stated performance measures. Noise testing shall be required to demonstrate the equipment has been installed and is properly reducing noise levels.

- **Idling Prohibition and Enforcement:** CVWD and CSD shall prohibit unnecessary idling of internal combustion engines. In practice, this would mean turning off equipment if it would not be used for five or more minutes.
- **Install Measures to Reduce Vibration:** Should pile driving or a vibratory roller be required for Proposed Project construction, the contractor shall conduct vibration monitoring at any residences or buildings located less than 50 feet from construction activities using such equipment. Ground vibration levels at the nearest residential structure to the construction site shall be monitored using vibration sensor(s) or velocity transducer with adequate sensitivity capable of measuring peak particle velocity level in the frequency range of 1 Hz to 100 Hz. If the vibration level due to construction activities exceeds the Proposed Project's criteria of 0.2 inch/second, the contractor shall make modifications/revisions to construction methods for approval by CVWD and CSD. Measures may include features such as use of roller compactor in lieu of vibratory compactors to ensure that the PPV remains at less than the 0.2 inch/second threshold.
- **Pre-Construction Notification:** At least two weeks prior to construction, written notifications to residents within 500 feet of the Proposed Project shall be sent, identifying the type, duration, and frequency of construction activities. For sensitive receptors, written notification shall either be hand-delivered or sent via certified mail. Signage shall also be posted at the construction site. Notifications shall also identify a mechanism for residents to complain to CVWD for construction related noise. As required by the California Coastal Commission, noticing to mariners will be provided in advance of work on the ocean outfall.
- **Schedule Construction on School Property Outside the School Year:** If Well Site #1 is selected for an injection well, construction at Well Site #1 shall be limited to school holidays (summer, winter, or spring break) as appropriate for the required construction timeframe.
- **Appoint a Primary Point of Contact:** CVWD and CSD will appoint a staff member or a third-party public information officer to act as primary point of contact for their respective components of the Proposed Project. This point of contact shall serve as a public information officer to receive comments from the public, as well as provide updated project information as appropriate during the project planning, design, and construction stages.

3.15 Population and Housing

As explained in *Section 1.4 Evaluation of Environmental Impacts*, all topics under Population and Housing were found to have No Impact or Less than Significant Impact for the Approved Project, and the finding would not change under the Modified Project.

The Modified Project would be constructed using the same or substantially similar construction methods as the Approved Project, would have the same overall number of wells and components, be located in the same sites, and would have the same or substantially similar operations and maintenance activities as the Approved Project. Therefore, the Modified Project would have the same findings of No Impact or Less than Significant Impacts for Population and Housing as the Approved Project.

Mitigation Measures

None required or recommended.

3.16 Public Services

The EIR identified the potential for impacts to Public Services, therefore environmental checklist question 3.16-1 is evaluated here for the Modified Project.

3.16-1) Would the Project 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 public services:

Fire protection

Police protection

Schools

Parks

Other public facilities

The Approved Project would be constructed within roadway ROWs and may be constructed on public park sites, school property, or other public or semi-public sites. Construction activities could temporarily disrupt portions of these properties, though aboveground facilities would be secured with fencing and visually screened to reduce potential impacts to the aesthetic character of the well sites. Construction activities could result in delayed response times for emergency services due to construction-related traffic delays and/or detours. **Mitigation Measure 3.18-1** (Transportation Management Plan) requires a Transportation Management Plan that considers the needs of emergency services and would reduce impacts to less than significant.

The Modified Project does not change the type or design of aboveground facilities in or near parks, schools, or public facilities. It would alter the AWPF site design to expand the flood wall and install the flood gate, but these changes would be made consistent with the existing site. The Modified Project would result in the same types of potential impacts to emergency services as the Approved Project because it would also include lane closures during construction of pipelines and wells and modifications to the flood wall and flood gate. Access to the WWTP site where the flood wall and flood gate would be construction

would need to be maintained to support operation of the treatment plant during construction. Because the Modified Project would involve the same construction activities and locations as the Approved Project, **Mitigation Measure 3.18-1** would be required to reduce potential impacts to emergency services to less than significant. With incorporation of the previously adopted Mitigation Measures for the Approved Project, impacts would remain less than significant. Therefore, no new impact would occur as a result of the Modified Project and no new mitigation would be required.

Mitigation Measures:

To mitigate impacts related to public services, CVWD shall implement **Mitigation Measure MM 3.18-1** (listed in *Section 3.18 Transportation*) which were previously adopted in the EIR for the Approved Project. Impacts of the Modified Project are the same as the Approved Project: less than significant with mitigation incorporated. No new mitigation is required for the Modified Project.

3.17 Recreation

As explained in *Section 1.4 Evaluation of Environmental Impacts*, all topics under Recreation were found to have No Impact or Less than Significant Impact for the Approved Project, and the finding would not change under the Modified Project.

The Modified Project would not change the overall type, size, or location of facilities constructed under the Approved Project. Therefore, similar to the Approved Project, the Modified Project would not require the construction or expansion of recreation facilities, nor would it result in the need to expand or construct recreational facilities.

Mitigation Measures

None required or recommended.

3.18 Transportation

As explained in in *Section 1.4 Evaluation of Environmental Impacts*, this analysis only discusses checklist questions 3.18-1, 3.18-3, and 3.18-4, because the other topics under Transportation were found to be No Impact or Less than Significant Impact in the EIR and the finding would not change under the Modified Project.

The Approved Project would have temporary impacts during construction by temporarily changing the provision of roadways, public transit, bicycle and/or pedestrian facilities within the Study Area. Specifically, lane and/or road closures may be required where pipelines, monitoring wells, or injection wells would be installed in roadway ROW. Construction equipment and materials would be staged temporarily either within the construction zone on roads or vacant parcels near the construction area which may temporarily impact transit stops, bicycle and/or pedestrian facilities. The Approved Project pipeline may be constructed along Linden and Carpinteria Avenues, both of which are high-traffic, arterial roadways. Other roadways that may be used for construction of injection wells (Meadow View Lane) or monitoring well clusters are not high-traffic, arterial

roadways. These activities would have temporary impacts on the circulation system (checklist question 3.18-1). The potential for lane and road closures, and the need to transport construction equipment and materials to and from the construction sites, could impact emergency access (checklist question 3.18-4). Changes to roadway configurations to accommodate construction equipment, staging, and construction activities could increase hazards (checklist question 3.18-3), and would result in a potentially significant impact. **Mitigation Measure MM 3.18-1** would be required to reduce impacts related to transit, circulation, emergency access, and hazards associated with roadway configurations to less than significant. Under **Mitigation Measures MM 3.18-1**, a Transportation Management Plan would be developed. The Transportation Management Plan would include applicable measures, such as the use of flaggers, signage, cones, and other traffic control measures, to reduce construction-related traffic congestion as well as clearly define temporary detour routes. Further, Mitigation Measure MM 3.18-1 requires coordination with emergency services to alert them of the expected roadway and lane closures and to identify alternate access routes as needed.

The Modified Project would result in similar road or lane closures as the Approved Project because the construction activities, construction equipment, staging needs, and locations would be the same or substantially similar as the Approved Project. As with the Approved Project, **Mitigation Measure MM 3.18-1** would be required to reduce impacts to less than significant. Therefore, no new transportation impacts would occur as a result of the Modified Project and no new mitigation would be required.

Mitigation Measures:

To mitigate impacts related to transportation, CVWD shall implement **Mitigation Measure MM 3.18-1** (listed below) which was previously adopted for the Approved Project. Impacts of the Modified Project are the same as the Approved Project: less than significant with mitigation incorporated. No new mitigation is required for the Modified Project.

- **MM 3.18-1 Develop and Implement a Transportation Management Plan.** Prior to construction, a Transportation Management Plan shall be developed by CVWD. Prior to construction, a Transportation Management Plan shall be developed by CVWD. The Transportation Management Plan shall be implemented by CVWD and/or its construction contractor during construction of the Proposed Project and shall conform to Caltrans' Transportation Management Plan Guidelines. Such a plan shall include, but is not limited to:
 - **Transportation Routes:** CVWD shall determine construction staging site locations and potential road closures, alternate routes for detours, and planned routes for construction-related vehicle traffic. It shall also identify alternative safe routes and policies to maintain safety along bike and pedestrian routes during construction.
 - **Coordination with Emergency Services:** CVWD shall coordinate with the police, fire, and other emergency services to alert these entities about potential construction delays and alternate emergency access routes if necessary. To

the extent possible, CVWD shall minimize the duration of disruptions/closures to roadways and critical access points for emergency services.

- **Coordination with Recreation Facilities:** CVWD shall also coordinate with any affected recreational facilities owners/operators to minimize the duration of disruptions/closures to recreational facilities and adjacent access points.
- **Coordination with Metropolitan Transit District (MTD):** If the Proposed Project will affect access to existing MTD bus stops, the Transportation Management Plan shall also include temporary, alternative bus stops, as determined in coordination with MTD.
- **Coordination with Caltrans:** CVWD shall coordinate with Caltrans on its construction schedule, potential road or lane closures, and alternate routes that may affect Caltrans-owned or operated facilities and to confirm the Transportation Management Plan conforms with Caltrans' Transportation Management Plan Guidelines.
- **Coordination with Schools:** CVWD shall coordinate timing of construction with the nine schools in the vicinity of the Proposed Project to minimize construction impacts during the regular school year.
- **Transportation Control and Safety:** The Transportation Management Plan shall provide for traffic control measures including flag persons, warning signs, lights, barricades, cones, and/or detour routes to provide safe passage of vehicular, bicycle and pedestrian traffic and access by emergency responders.
- **Plan Approval:** This plan shall be submitted to the City's planning or public works departments for review and acceptance by the City Transportation Safety Committee, Transportation Committee, and City Public Works Director/City Engineer, as well as any necessary permits acquired prior to construction.
- **Public Notification:** Prior to beginning construction, written notice shall be provided regarding potential road closures as described in the Transportation Management Plan. Notice shall be delivered to potentially affected properties within a 500-foot radius, as determined by the City's Public Works Director/City Engineer. The notice shall contain a brief description of the work, work dates, and contact information of the Contractor's superintendent and the Engineer. The notice shall be delivered at ten (10) calendar days and again at two (2) working days prior to beginning the work. The notice shall be in the form of a door hanger made of index paper with the size of 14 inches by 4.5 inches. The notice shall be in English with translation in Spanish. A revised notice will be delivered in the event of delays in schedule, as soon as reasonably possible after a delay is identified and revised schedule known.

- **Resurfacing Standards:** Where impervious surfaces such as roadway ROWs or sidewalks, are disturbed by construction activities (e.g., excavation, staging, etc.), these surfaces shall be restored to pre-construction conditions and in accordance with applicable City and County standards.

3.19 Tribal Cultural Resources

The EIR identified the potential for impacts to Tribal Cultural Resources, therefore environmental checklist questions 3.19-1 and 3.19-2 are evaluated here for the Modified Project.

3.19-1) 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)

The Cultural Resources Assessment Report conducted for the Approved Project (included as Appendix E to the EIR) identified one previously-recorded cultural resource within the Study Area. This was prehistoric archaeological site CA-SBA-7, a large prehistoric/ethnohistoric village site that is thought to represent the remains of the Chumash village of Mishopshow, and is an important cultural resource. Although previous archaeological investigations found fragments of shells west of Carpinteria Creek, evidence for the presence of CA-SBA-7 in the vicinity of the current Study Area is minimal and the site's substantial cultural deposits are concentrated on the east side of Carpinteria Creek outside of the Study Area.

It is not anticipated that construction of the Approved Project would substantially impact this resource. However, because of cultural sensitivity of the area, the presence of prehistoric archaeological site CA-SBA-7, and the grading and excavation activities that would occur during construction, there would be potential to uncover archaeological or other significant tribal cultural resources during construction of the Approved Project (checklist question 3.19-1) or other previously uncovered tribal cultural resources (checklist question 3.19-2), and mitigation was required. **Mitigation Measures MM 3.6-2a** (Archaeological and Native American Monitoring), **MM 3.6-2b** (Unanticipated Discovery of Cultural Resources) and **MM 3.6-3** (Unanticipated Discovery of Human Remains) would reduce impacts to less than significant by implementing archaeological and Native American monitoring, halting construction activities if unanticipated discovery of cultural resources occurs, and compliance with the State of California Health and Safety Code 7050.5, including immediately halting construction activities and notifying the County Coroner's office upon discovery of human remains. Additionally, CVWD would implement cultural resources training for construction workers, including archaeological and tribal resource identification

The Modified Project would be constructed within the 0.5 mile Study Area evaluated in the Cultural Resources Assessment. It would construct the same types of facilities as the Approved Project, and use the same locations. Although a monitoring well cluster would be constructed at Well Site #6 rather than an injection well, well drilling activities for monitoring wells would be substantially similar to that for injection wells and the potential

for impacts the same. As such, the Modified Project would have the same potential for impacts on Tribal Cultural Resources as the Approved Project, and **Mitigation Measures MM 3.6-2a, MM 3.6-2b, and MM 3.6-3** would be implemented to reduce impacts to less than significant. With incorporation of the previously adopted Mitigation Measures for the Approved Project, impacts would remain less than significant. Therefore, no new impact would occur as a result of the Modified Project and no new mitigation would be required.

Mitigation Measures:

To mitigate impacts related to tribal cultural resources, CVWD shall implement **Mitigation Measures MM 3.6-2a** (Archaeological and Native American Monitoring), **MM 3.6-2b** (Unanticipated Discovery of Cultural Resources) and **MM 3.6-3** (Unanticipated Discovery of Human Remains) (listed in *Section 3.6, Cultural Resources*), which were previously adopted for the Approved Project. Impacts of the Modified Project are the same as the Approved Project: less than significant with mitigation incorporated. No new mitigation is required for the Modified Project.

3.20 Utilities and Service Systems

As explained in *Section 1.4 Evaluation of Environmental Impacts*, all topics under Utilities and Service Systems were found to have No Impact or Less than Significant Impact for the Approved Project, and the finding would not change under the Modified Project.

The Modified Project would not change the overall types of facilities constructed, the location of construction activities, or the volume of water produced. It would move the location of a monitoring well clusters from a roadway ROW to a site already approved for injection well use, expand the flood wall, and improve the mechanics of the flood gate, but would not move them to a location that could impact utilities or service systems in a different manner than the Approved Project. Therefore, similar to the Approved Project, the Modified Project would not impact utilities or service systems.

3.21 Wildfire

As explained in in *Section 1.4 Evaluation of Environmental Impacts*, this analysis only discusses checklist questions 3.21-1, 3.21-2, and 3.21-3, because the other topics under Wildfire were found to be No Impact or Less than Significant Impact for the Approved Project and the finding would not change under the Modified Project.

3.21-1) Substantially impair an adopted emergency response plan or emergency evacuation plan

Construction activities for the Approved Project would have temporary effects on traffic flow and lane configurations at specific intersections and roadways, which could affect emergency access and response times in the Study Area. Construction activities could temporarily block access to some roadways and driveways that are currently used by emergency response vehicles or in emergency evacuations. **Mitigation Measure MM 3.18-1** (Transportation Management Plan) would require the development and implementation of a Transportation Management Plan which would outline temporary

detour routes and alternative emergency access and evacuation routes. Implementation of **Mitigation Measure MM 3.18-1** would reduce impacts to less than significant.

The Modified Project would have similar impacts on traffic flow and land configurations as the Approved Project because it would be constructed in the same locations and include the same types of construction activities. Therefore the Modified Project would have similar potential to affect emergency access and response times in the Study Area as the Approved Project. As such, **Mitigation Measure MM 3.18-1** (Transportation Management Plan) would be required which would outline temporary detour routes and alternative emergency access and evacuation routes, and requires coordination with emergency services. With incorporation of the previously adopted Mitigation Measures for the Approved Project, impacts would remain less than significant. Therefore, no new impact would occur as a result of the Modified Project and no new mitigation would be required.

3.21-2) 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

There are no areas within the City or Study Area that are within a designated very high fire hazard safety zone, and the City's *General Plan Safety Element* designates the portion of the City that includes the Study Area as a Low Fire Hazard Zone. The Approved Project would not construct housing and would not expose residents to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. However, as a precautionary measure against wildfire risk, **Mitigation Measure MM 3.10-7** (Implement Construction Equipment and Staging Area BMPs) would be implemented for the Approved Project. This mitigation measure requires construction staging areas be cleared of dried vegetation and other material that could ignite, and equipment that heats up to be stored only in cleared areas. Additionally, **Mitigation Measure MM 3.10-7** would require all construction equipment be kept in good working order and equipped with spark arrestors to prevent potential sparks, a spotter be utilized during welding activities, and fire extinguishers be made available at all construction sites. With implementation of **Mitigation Measure MM 3.10-7**, impacts would be less than significant.

The Modified Project would be located within the same general area as the Study Area and would construct the same number and types of facilities as the Approved Project, using the same or substantially similar construction methods. As such, the Modified Project would have the same potential to exacerbate wildfire risk, and **Mitigation Measure MM 3.10-7** would be required. With incorporation of the previously adopted Mitigation Measures for the Approved Project, impacts would remain less than significant. Therefore, no new impact would occur as a result of the Modified Project and no new mitigation would be required.

3.21-3) 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

No new roads or utility service in previously-undeveloped areas would be needed, as all Approved Project facilities are located in urbanized areas of the City of Carpinteria. Maintenance of Approved Project facilities would include daily or periodic inspections inspection and maintenance of the various AWPf, pump stations, pipelines, and injection wells, routine maintenance of the facilities and infrastructure, and chemical deliveries, none of which are expected to exacerbate risk of fire. Potential risk of fire associated with construction of the Approved Project would be reduced to less than significant levels with implementation of **Mitigation Measure MM 3.10-7** (Implement Construction Equipment and Staging Area BMPs), which would require clearing construction staging areas of dried vegetation and other material that could ignite and storing equipment that heats up only in cleared areas and that all construction equipment be kept in good working order and equipped with spark arrestors to prevent potential sparks, a spotter be utilized during welding activities, and fire extinguishers be made available at all construction sites.

The Modified Project would be located within the same area as the Approved Project and would construct the same number and types of facilities as the Approved Project, using the same or substantially similar construction methods. As such, the Modified Project would have the same potential to exacerbate wildfire risk, and **Mitigation Measure MM 3.10-7** would be required. With incorporation of the previously adopted Mitigation Measures from the EIR, impacts would remain less than significant. Therefore, no new impact would occur as a result of the Modified Project and no new mitigation would be required.

Mitigation Measures:

To mitigate impacts related to wildfire, CVWD shall implement **Mitigation Measure MM 3.10-7** (listed in *Section 3.10, Hazards and Hazardous Materials*) and **Mitigation Measure MM 3.18-1** (listed in *Section 3.18 Transportation*), which was previously adopted in the EIR for the Approved Project. Impacts of the Modified Project are the same as the Approved Project: less than significant with mitigation incorporated. No new mitigation is required for the Modified Project.

3.22 Environmental Justice

As explained in *Section 1.4 Evaluation of Environmental Impacts*, all topics under Environmental Justice were found to have No Impact or Less than Significant Impact for the Approved Project, and the finding would not change under the Modified Project.

No part of the Study Area, under either the Approved Project or Modified Project, is defined as a community experiencing environmental justice issues. Therefore, similar to the Approved Project, the Modified Project would not result in environmental justice impacts.

Mitigation Measures

None required or recommended.

3.23 Federal Crosscutters

The Modified Project, as with the Approved Project, may receive funding under a state program that also has a federal funding component and/or from a federal program. Therefore, to assist in compliance with the federal environmental requirements for the funding program, this Addendum includes analyses pertinent to several federal cross-cutting regulations (also referred to as federal cross-cutters, CEQA-Plus, or Tier 2). The EIR included analysis of Federal Crosscutters within each resource area's analysis. This Addendum therefore also included review of federal crosscutters in each resource area analysis above. The federal cross-cutters considered in the analysis above include the Archaeological and Historic Preservation Act (AHPA), Clean Air Act, Coastal Zone Management Act, Environmental Justice, Executive Order 11988 - Floodplain Management, as amended by Executive Orders 12148 and 13690, Executive Order 11990 - Protection of Wetlands, Executive Order 13007 – Indian Sacred Sites, Executive Order 13195 – Trails for America in the 21st Century, Farmland Protection Policy Act, Federal Endangered Species Act (ESA), Federal Migratory Bird Treaty Act, Bald and Golden Eagle Protection Act, and Executive Order 13168, Fish and Wildlife Coordination Act (FWCA), Magnuson-Stevens Fishery Conservation and Management Act, National Historic Preservation Act (NHPA), Rivers and Harbors Act, Section 10, Safe Drinking Water Act, Sole Source Aquifer Protection, and Wild and Scenic Rivers Act Executive Order 13122 – Invasive Species.

4. CONCLUSIONS

Based on the information provided in *Section 3, Evaluation of Environmental Impacts*, the newly evaluated impacts of the Modified Project would not substantially alter impacts previously identified in the EIR for the Approved Project. **Mitigation Measures MM 3.1-4, MM 3.4-1a, MM 3.4-1b, MM 3.4-1c, MM 3.4-2, MM 3.4-3a, MM 3.4-3b, MM 3.4-3c, MM 3.4-5, MM 3.6-2a, MM 3.6-2b, MM 3.6-3, MM 3.8-1, MM 3.8-6, MM 3.10-1a, MM 3.10-1b, MM 3.10-4, MM 3.10-7, MM 3.14-1a, MM 3.14-1b, MM 3.14-1c, and MM 3.18-1**, included in the EIR would also apply to the Modified Project as identified in this Addendum and would reduce impacts of the Modified Project to less-than-significant levels. Therefore, the conclusions of this Addendum remain consistent with those made in the EIR. No new significant impacts have been identified, nor is the severity of newly identified impacts substantially greater than impacts identified in the EIR. No additional CEQA review is required.