

Final Environmental Impact Report

Carpinteria Advanced Purification Project

SCH# 2019011016

Prepared for:



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COMMITMENT & INTEGRITY DRIVE RESULTS

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Acronyms and Abbreviations

Term	Description
AB	Assembly Bill
AFY	acre-feet per year
APE	Area of Potential Effect
AWPF	Advanced Water Purification Facility
CAPP	Carpinteria Advanced Purification Project
CARB	California Air Resources Board
CASGEM	California Statewide Groundwater Elevation Monitoring
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEC	constituents of emerging concern
CEQA	California Environmental Quality Act
CFCG	California Fish and Game Code
CNEL	Community Noise Equivalent Level
CSD	Carpinteria Sanitary District
CVWD	Carpinteria Valley Water District
DDW	Division of Drinking Water
DWR	California Department of Water Resources
EIR	Environmental Impact Report
FEMA	Federal Emergency Management Agency
GSA	Groundwater Sustainability Agency
GSP	Groundwater Sustainability Plan
IPR	indirect potable reuse
LCP	Local Coastal Program
LF	linear foot (feet)
LOMR	Letter of Map Revision
LSA	Lake and Streambed Alteration
LTS	Less Than Significant
LTS-M	Less than Significant with Mitigation
MBTA	Migratory Bird Treaty Act of 1918
MGD	million gallons per day
MM	Mitigation Measure

Acronyms and Abbreviations

Term	Description
MMRP	Mitigation Monitoring and Reporting Program
MTD	Santa Barbara Metropolitan Transit District
NDMA	n-nitrosodimethylamine
NEPA	National Environmental Policy Act
NOA	Notice of Availability
NOC	Notice of Completion
NOD	Notice of Determination
NOP	Notice of Preparation
NPDES	National Pollutant Discharge Elimination System
PFOA	perfluorooctane sulfonic acid
PFOS	perfluorooctanoic acid
PPV	peak particle velocity (measured in inches per second)
PVC	polyvinyl chloride
PWPS	purified water pump station
RO	reverse osmosis
ROW	right-of-way
RWQCB	Regional Water Quality Control Board
SGMA	Sustainable Groundwater Management Act
SWP	State Water Project
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TMF	Technical Managerial and Financial Capacity
TOC	total organic carbon
TPZ	Tree Protection Zone
UF	ultrafiltration
U.S.	United States
USBR	United States Bureau of Reclamation
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
WEAP	Worker Environmental Awareness Program
WWTP	wastewater treatment plant

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1. INTRODUCTION

Carpinteria Valley Water District (CVWD) proposes the *Carpinteria Advanced Purification Project* (CAPP, or Proposed Project) which involves the construction and operation of a new advanced water purification facility (AWPF), conveyance pipelines, and injection wells to advance treat recycled water for injection into the Carpinteria Groundwater Basin and later recovery for treatment to meet potable demands. The Proposed Project would create an additional 1,100 acre-feet per year (AFY) potable water during the initial phase with two injection wells, and ultimately produce 1,200 AFY potable water with a third injection well.

CVWD is the Lead Agency for compliance with the California Environmental Quality Act (CEQA) review process for the CAPP. Because of potential Federal and State funding opportunities, this Environmental Impact Report (EIR) has been prepared to address National Environmental Policy Act (NEPA) and “CEQA-Plus” requirements for use by the Federal Emergency Management Agency (FEMA), United State Bureau of Reclamation (USBR), and/or State Water Resources Control Board (SWRCB) as a basis for decision-making for the Proposed Project. Carpinteria Sanitary District (CSD) is a project partner and responsible agency on the Proposed Project because the AWPF would be constructed at CSD’s Carpinteria Wastewater Treatment Plant (WWTP) site and would be operated by CSD staff.

CVWD released a Draft EIR for public review on July 1, 2019. CVWD has considered comments received on the Draft EIR and has prepared this Final EIR, which addresses those comments. This Final EIR has been prepared in accordance with CEQA Guidelines §15132.

1.1 Project Background and Purpose

This EIR has been prepared by CVWD in consultation with CSD as a project partner and responsible agency. The CAPP has been proposed by CVWD to increase local water supply and reliability. CVWD currently serves 4,143 acre-feet per year (AFY) potable water to approximately 15,600 people. Sources of water supplies include groundwater from the Carpinteria Groundwater Basin, the Cachuma Project, and the State Water Project (SWP). The Carpinteria Valley experienced moderate to exceptional drought between Summer 2013 and Winter 2019 (U.S. Drought Monitor, 2019), which resulted in reduced availability of Cachuma Project and SWP supplies and an increase in groundwater pumping. Other supply vulnerabilities include capacity limitations of the SWP conveyance system, increasing costs to sustain reliability, new groundwater regulations, competition for Lake Cachuma water, and the vulnerability of Cachuma Project conveyance systems. Future concerns regarding supply reliability include the effects of climate change, which may result in increased duration and intensity of drought and decreased availability of surface water and imported supplies, and renegotiation of Cachuma Project contracts that are expected to affect available water supplies from the project. The Proposed Project addresses water supply reliability issues by creating 1,100 AFY water available for potable supply even during drought.

1.2 Project Location and Description

The Proposed Project is located primarily in the City of Carpinteria, with one proposed well site in unincorporated Santa Barbara County (Well Site #6). The Project footprint covers the AWPF site at 5351 Sixth Street (co-located with CSD’s WWTP site), an up-to-40-foot wide corridor that follows the conveyance pipelines, 10,000 square feet at each of up to three injection well sites, 5,000 square feet at each of three monitoring well sites, and the immediate area around the existing ocean outfall. The injection well sites would be located approximately 0.8 to 1.0 miles north of the AWPF. Five potential injection well sites have been identified, though only three would be selected as design continues and property rights are acquired. Conveyance pipelines between the AWPF and the injection wells would generally run within the public roadway rights-of-way (ROW). The pipeline would cross U.S. Highway 101 at the Linden Street Overpass in a

pipeline casing being installed by Caltrans as part of a separate project. The Proposed 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.

The purpose of the *Carpinteria Advanced Purification Project* is to create a new drought-resistant and reliable supply of local water, produce water suitable for groundwater recharge and potable reuse, and reduce CVWD's reliance on imported surface water from the Cachuma and State Water Projects. The Project involves construction and operation of a new AWPf, up to three new injection wells, pipelines to convey advanced treated water to the injection wells for recharge to the Carpinteria Groundwater Basin, and up to six monitoring wells to monitor potential changes in groundwater levels and quality.

The Proposed Project would initially produce approximately 1,100 AFY (1.0 million gallons per day [MGD]) of purified water from the CSD WWTP for injection into the local groundwater basin, where it ultimately would be used for CVWD potable water supply. Existing CVWD production wells would be used to recover treated water from the groundwater basin. The ultimate project assumes an expansion from 1.0 MGD to 1.2 MGD based on projected future increases in WWTP flows. The ultimate Project includes the following facilities:

- AWPf consisting of equalization tank, microfiltration, reverse osmosis, and an advanced oxidation process, to be located on the WWTP site
- Purified water pump station, to be located on the WWTP site
- 6,100 linear feet (LF) of 12-inch conveyance pipeline from the purified water pump station to a well lateral split point, including Caltrans installation for the Linden Avenue overpass over US Highway 101
- 2,000 LF of 8-inch conveyance pipeline from the well lateral split point to individual injection wells
- Up to three 14-inch diameter injection wells with backwash pumps and one 42,000 gallon tank
- Either 1,400 LF of 12-inch well backwash discharge piping to existing sanitary sewers, or 600 LF of 12-inch well backwash discharge piping to existing storm drain culverts.
- Up to six monitoring wells
- Modifications to the CSD WWTP ocean outfall

1.3 Purpose of the Final EIR

This document is being issued by CVWD as the Final EIR for the CAPP. CEQA requires lead agencies that have completed a Draft EIR to consult with and request comments on the environmental document from responsible, trustee, and other agencies with jurisdiction over environmental resources that could be affected by the Proposed Project. Under CEQA, the public must also be provided an opportunity to review the Draft EIR and comment on the environmental analysis. This Final EIR has been prepared to respond to comments on the Draft EIR submitted by agencies, organizations, and members of the public. The Final EIR consists of the Draft EIR and its appendices (Volume I) and this document containing comment letters, responses to comments, and clarifications, revisions, and corrections to the Draft EIR in the form of an Errata (Volume II). A Mitigation Monitoring and Reporting Program (MMRP) will be published separately but remains an integral part of the EIR and CEQA compliance for the Proposed Project. CVWD's Board of Directors will consider the Final EIR and MMRP before approving or denying the Proposed Project.

1.4 CEQA Compliance

CEQA requires that all state and local government agencies consider the environmental consequences over which they have discretionary authority before taking an action that has the potential to affect the environment. In conformance with CEQA (California Public Resources Code, §21000 et seq.) and CEQA Guidelines (CCR Title 14

§15000 et seq.), CVWD has conducted the CEQA process, including the preparation and circulation of the Draft EIR, to provide to the public and Responsible and Trustee Agencies reviewing this project information about its potential effects on the local and regional environment. CVWD has prepared this document pursuant to CEQA Guidelines §15132, which specifies that “*The Final EIR shall consist of:*

- a) *The draft EIR or a revision of the draft.*
- b) *Comments and recommendations received on the draft EIR either verbatim or in summary.*
- c) *A list of persons, organizations, and public agencies commenting on the draft EIR.*
- d) *The responses of the Lead Agency to significant environmental points raised in the review and consultation process.*
- e) *Any other information added by the Lead Agency.”*

1.4.1 CEQA EIR Process

The EIR process includes a Notice of Preparation, scoping meeting, preparation of a Draft EIR, public review of Draft EIR, preparation of responses to comments, and production of a Final EIR with any revisions or clarifications necessary in response to comments received.

Notice of Preparation and Scoping Meeting

In accordance with CEQA Guidelines §15082(a), 15103, and 15375, a Notice of Preparation (NOP) for the Proposed Project was issued by CVWD on January 7, 2019 and was made available for public review for a 30-day period that ended on February 8, 2019. The NOP provided a description, maps, and location of the Proposed Project, along with a brief description of potential effects. The NOP was sent to the Governor’s Office of Planning and Research State Clearinghouse, to responsible agencies, and was made publicly available on CVWD’s website (<http://cvwd.net/capp/public-participation-meetings/#top>).

A Scoping Meeting was held on January 24, 2019, during the 30-day comment period for the NOP, at the Veteran’s Hall in Carpinteria, consistent with CEQA Guidelines §15083. CVWD presented information about the Proposed Project at the Scoping Meeting, which was an opportunity to respond to informal questions and accept public comments on the NOP. The Scoping Meeting was publicly advertised in the Santa Barbara Independent and the Coastal View News on January 10 and January 17, 2019. A copy of the NOP, proof of publication for the Scoping Meeting, and comments received during the public comment period for the NOP are included as Draft EIR Appendix A.

Tribal notification for the Proposed Project was conducted in compliance with Assembly Bill (AB) 52. AB 52 letters were mailed to nine tribal contacts, and comments received from three tribal contacts. A copy of the AB 52 letter and tribal contact list is included in Draft EIR Appendix B. CVWD and Barbareño/Ventureño Band of Mission Indians have engaged in email dialogue and transmittal of Project materials.

Draft EIR

In accordance with CEQA Guidelines §15120-15131, the Draft EIR contains a description of the project, description of the environmental setting, identification of project impacts, mitigation measures for impacts found to be significant, and an analysis of project alternatives. This document complies with both NEPA and “CEQA-Plus” requirements, because CVWD may apply for grant and loan funding from FEMA, USBR, and/or SWRCB. To comply with those regulations, this EIR addresses the full requirements of CEQA, Federal Endangered Species Act, Federal National Historic Preservation Act, General conformity rule for the Clean Air Act, and a suite of Federal cross-cutting laws (e.g., Migratory

Bird Treaty Act, protection of wetlands, Coastal Zone Management Act, Farmland Protection Policy Act, Wild and Scenic Rivers Act, etc.).

Public Review of Draft EIR

Upon completion of the Draft EIR, CVWD filed a Notice of Completion (NOC) with the State Clearinghouse on July 1, 2019 to begin the 60-day public review period (Public Resources Code §21161). Concurrent with the NOC, the Draft EIR was distributed to responsible and trustee agencies, other affected agencies, and interested parties, as well as all parties requesting a copy of the EIR in accordance with Public Resources Code §21092(b)(3). A Notice of Availability (NOA) and Notice of Public Meeting was issued on July 1, 2019, and published in the Coastal View News on July 4, July 11, and July 18, 2019. A notice was also mailed to all District customers and 5 homes in Seacoast Village community that were in close proximity to the proposed injection well at Well Site #3 were directly contacted by District Staff and reminded of the Public Meeting..

A public meeting was held to solicit additional comments on the Proposed Project on July 18, 2019. During the public review period, the Draft EIR was available in print for review at CVWD, CSD, the Carpinteria Library, and online at CVWD's CAPP website (<http://cvwd.net/capp/public-participation-meetings/#top>). The public meeting was advertised in the Coastal View News and to local residents of Seacoast Village, as described in the paragraph above. Agencies, organizations, and interested parties, including those not previously contacted, or who did not respond to the NOP, had the opportunity to comment on the Draft EIR during the public review period.

Response to Comments and Final EIR

In accordance with CEQA Guidelines §15132, this Final EIR (Volume II) contains all comments received on the Draft EIR, responses to those comments, and clarifications, revisions, and corrections to the Draft EIR in the form of an Errata. This Final EIR will be available for review at CVWD's CAPP website (<http://cvwd.net/capp/public-participation-meetings/#top>) on December 1, 2019, which is at least 10 days prior to the December 11, 2019 CVWD Board meeting to consider certification of the EIR, per CEQA Guidelines §15088. A written Notice of Availability of the Final EIR and Notice of Public Meeting was distributed to all public agencies who commented on the Draft EIR. Email notice was sent to CVWD's stakeholder email list and newspaper notice was posted in the Coastal View News on December 5, 2019. If the CVWD Board certifies the EIR, a Notice of Determination (NOD) will be filed with the County Clerk and State Clearinghouse within 5 days of the Board meeting.

1.5 NEPA Compliance

This Final EIR has been prepared as a "CEQA-Plus" document to satisfy NEPA requirements to be considered for federal funding. CVWD may apply for grants and/or loans from FEMA, USBR, and SWRCB (funds allocated via U.S. Environmental Protection Agency [EPA]) that also requires NEPA compliance. NEPA requirements include, but are not limited to, an analysis of environmental justice and discussion of how the Proposed Project complies with Federal Executive Orders. Because this EIR has been prepared to include sections required under NEPA, federal agencies could use this EIR and other NEPA-required supporting documents as a basis for decision making for the proposed Action.

CEQA requires environmental review of a "project" and NEPA requires environmental review of an "action". Because the Proposed Project and the proposed Action are the same, they are referred throughout this document as the Proposed Project.

1.6 Certification Process

The Draft EIR was circulated for review, and opportunities for public and agency review and comment were made available in accordance with CEQA and NEPA. The Final EIR will be made available for a minimum 10-day period before its certification. In accordance with CEQA §15088, CVWD will notify all public agencies that commented on the Draft EIR when the Final EIR is available for review. CVWD anticipates that its Board of Directors will consider the EIR for certification on December 11, 2019 at Carpinteria City Hall (5775 Carpinteria Avenue, Carpinteria, CA 93013).

CVWD's Board of Directors will consider the Final EIR for certification as complete under CEQA Guidelines §15090. CSD, as a responsible agency, may also use this EIR when approving actions associated with the Proposed Project. Other responsible agencies are anticipated to use this EIR when approving actions associated with the Proposed Project (see Table 2-4 on page 2-25 of the Draft EIR). CVWD's Board of Directors will concurrently consider adoption of the MMRP. Upon project approval, a NOD would be filed.

1.7 Organization of this Document

The Final EIR consists of the Draft EIR and its appendices (Volume I) and comment letters, response to comments, and Errata (Volume II). In Volume II, *Section 2: Response to Comments on Draft EIR* contains each letter or email commenting on the Draft EIR, and written responses to each comment. Comment letters are reproduced, and following the letters, responses are provided to each individual comment as identified by numbers in the margin of each comment letter. *Chapter 3: Errata* contains clarification, revisions, and corrections to text of the Draft EIR based on the received comments, using an errata format. Text revisions are formatted in revision mode for ease of reference: <<strikeouts>> indicate removed text and <<underlines>> indicate new text.

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2. RESPONSE TO COMMENTS ON DRAFT EIR

The public review and comment period for the Draft EIR began on July 1, 2019 and ended on August 30, 2019. A public meeting was noticed and held on July 18, 2019, where the project was presented and comments were received. During the comment period, a total of 65 comments were recorded, of which 9 were provided in writing (letter or email) and 56 were received at the public meeting (verbal or on comment cards).

This chapter is organized as follows:

- *Section 2.1 Master Response – Noise and Vibration* includes a master response to noise and vibration topics that were raised by multiple commenters.
- *Section 2.2 Responses to Comment Letters Received during Public Comment Period* includes responses to written comments received via mail or email. The comment letters are listed below in Table 2-1. A copy of each comment letter is provided, immediately followed by responses to each letter. To assist with identifying which response addresses which comments, each letter or email has been given a number, based on order received, and comments within each letter are numbered. For example, the third comment in the first letter received is numbered “Comment 1-3”.
- *Section 2.3 Response to Comments Received During the Public Meeting on July 18, 2019* includes responses to comment cards and verbal comments received at the public meeting, as recorded by CVWD staff and/or consulting team. Table 2-2 includes an overview of the commenters that provided verbal input during the public meeting held on July 18, 2019, while Table 2-3 (starting on page 2-37) includes the comments as recorded. Verbal comments received during the public meeting are numbered in the order they were received.

Letter #	Comment Author	Author Affiliation	Comment Date
1	Reverend Monsignor Richard Martini	St. Joseph Church	July 18, 2019
2	Gary Blair	Resident	August 6, 2019
3	George Lehtinen	Seacoast Village Homeowner's Association	August 28, 2019
4	Gary Blair	Resident	August 29, 2019
5	Ingrid McRoberts	California Department of Transportation	August 29, 2019
6	Lisa Kurasch	Not Provided	August 29, 2019
7	Erinn Wilson	California Department of Fish and Wildlife, South Coast Region	August 30, 2019
8	Nick Bobroff	City of Carpinteria	August 30, 2019
9	Kira Redmond	Santa Barbara Channelkeeper	August 30, 2019

Person #	Comment Author	Author Affiliation	Comment Date
1	Mona Khashoggi	Resident	July 18, 2019
2	Michael Stephen	Resident	July 18, 2019
3	Dick Weinberg	Resident	July 18, 2019
4	Pat Beatty	Resident	July 18, 2019
5	Father Martin	St. Joseph Church	July 18, 2019
6	Kim Jones	Resident	July 18, 2019
7	Phyllis Sfetku	Resident	July 18, 2019
8	Ken Barnes	Visitor	July 18, 2019
9	Rene Van Wingerden	Resident	July 18, 2019
10	Gary Blair	Resident – Seacoast Village	July 18, 2019
11	Dennis Kuttler	Resident	July 18, 2019
12	Paulette	Resident	July 18, 2019
13	Ken Jones	Resident	July 18, 2019
14	Anonymous	-	July 18, 2019

2.1 Master Response – Noise and Vibration

Several of the commenters, including those at the public meeting, commented on similar topics. As such, CVWD identified the need to address noise and vibration-related comments under a Master Response. Many of the comments received have been addressed by this Master Response, and are referenced in the response to comments included in Section 2.2 and Section 2.3 below. This approach was used because CVWD recognizes that this topic is important to a number of commenters, and to provide consolidated and comprehensive responses while avoiding repetitive or partial responses to the same questions or parts of questions raised in different letters and comments.

This Master Response addresses comments related to noise and vibration generated by injection well drilling and the proposed location of the potential injection well within Well Site #2 and #3, near residences. Specific concerns included adequacy of Mitigation Measure 3-14.1-1a, noise generation during construction and operation of the injection well at Well Site #3, the location of the well adjacent to residences, the duration of drilling, and vibrations generated by construction activities. Comments addressed by this Master Response include: 1-1, 1-2, 1-4, 2-3, 2-10, 3-1, 3-2, 3-6, 4-2, 4-5, 4-6, 4-7, 4-9, 4-12, 4-13, 4-17, and 8-1. Comments received at the July 18, 2019 public meeting addressed by this Master Response include: 1, 2, 4, 5, 7, 12, 14, 16, 18, 19, and 50.

Construction Noise at Injection Wells

As described in Impact 3.14.4 in the Draft EIR, the City's *Environmental Guidelines* (City of Carpinteria, 2003) allows for temporary noise levels at residences of 75 dBA CNEL for 12 hours per 24 hour-period during construction projects. 75 dBA is a similar noise level as generated by a vacuum cleaner or a toilet flushing. Temporary construction that occurs outside of the hours allowed by municipal code would require a permit. Construction of the injection well would require 24-hour drilling for three weeks, with the loudest equipment being the rotary drill rig and grader, which would generate noise levels of 85 dBA at 50 feet. For context, an alarm clock and a garbage disposal generate 80 dBA of noise, while a passing diesel truck and snow blower generate 85 dBA. A rotary drill rig uses a rotating drill bit, circulating fluids (drilling "mud") and downward pressure to cut into soils or rocks. This method is used because it can drill deep

wells, but 24-hour drilling is necessary to retain the integrity of the borehole walls. Pausing drilling for too long risks collapse of the borehole and/or damage to aquifer materials.

Based on natural attenuation of noise, noise modeling completed for the Draft EIR found that at 100 feet from the drilling, noise levels would range from 72 to 79 dBA Leq (a measurement of noise generation over a 24-hour period that accounts for the higher noise sensitivity during nighttime hours). At greater than 100 feet, noise from injection well drilling would attenuate to below the 75 dBA threshold required by the City's Environmental Guidelines. With the use of noise dampening measures such as 24-foot high sound walls and noise dampening blankets, as required under Mitigation Measure MM 3.14-1a, noise levels would be further reduced. As noted in the Draft EIR, similar measures for the recent drilling of the El Carro No. 2 well resulted in instantaneous noise levels from the high 60s to a high of 72 dBA. Based on the results of noise modeling for the project, along with implementation of noise dampening measures as described in Mitigation Measure MM 3.14-1a, noise levels would be attenuated sufficiently to comply with the City's Environmental Guidelines for all properties 100 feet or more from the drilling site. Additionally, for residents affected by night-time drilling, Mitigation Measure MM 3.14-1a includes temporary housing. With implementation of these mitigation measures, noise impacts would be less than significant.

Vibration from Construction of Injection Wells

Potential vibratory impacts from construction of the Proposed Project are analyzed in Impact 3.14.2 in the Draft EIR. Pile driving, if used, would only occur at the WWTP site for construction of the AWPf facilities and would not be used at the injection well sites (see *Section 2.7.1* of the Draft EIR, page 2-19). Vibrations attenuate quickly with distance. Vibratory impacts of pile driving at the WWTP site was found to attenuate to 0.020 PPV (peak particle velocity, measured in inches per second) at the nearby residences located 250 feet away, perceptible to humans but below the level of becoming disturbing (see *Section 3.14.4*, page 3.14-17). The Federal Transit Administration's *Transit Noise and Vibration Impact Assessment Manual* (2018) provides guidance on what vibration levels may result in damage to structures. Reinforced-concrete, steel or timber structures may experience damage at 0.5 PPV. Engineered concrete and masonry structures could experience damage at 0.3 PPV, while non-engineered timber and masonry buildings could experience damage at 0.2 PPV. Mitigation Measure MM 3.14-1a requires the construction contractor to opt for lower vibration equipment where applicable, monitor vibration, and adjust construction methods to maintain appropriate vibration levels. With implementation of these mitigation measures, vibratory impacts would be less than significant.

Mitigation Measure 3.14-1a

CEQA Guidelines §15126.4 describes the requirements of a mitigation measure. Mitigation measures must minimize significant adverse impacts, be enforceable, have a nexus between the mitigation measure and a legitimate governmental interest, and be roughly proportional to the project impacts. If a mitigation measure cannot be legally imposed, it is not required to be proposed or analyzed.

Mitigation Measure MM 3.14-1a includes limited construction hours when possible, acquisition of appropriate permits (and adherence to permit requirements) for after-hour construction that may be necessary, noise dampening and shielding measures, temporary housing during nighttime construction when noise levels cannot be attenuated to meet applicable thresholds, location of staging areas away from sensitive receptors, installation of mufflers on loud equipment, prohibition on equipment idling, vibration reducing measures, pre-construction notification, scheduling of construction activities around school calendar, and designation of a public information officer.

For those residences that would be impacted by noise levels that exceed the City's threshold for construction noise, temporary housing would be provided under Mitigation Measure 3.14-1. This approach is "standard practice" where

noise impacts cannot be fully mitigated and is consistent with the recommendation in the City's comment letter provided during the scoping process for the Proposed Project. The same approach was used in the City's 2016 *Carpinteria Avenue Bridge Replacement Project EIR*. During the scoping process and comment period on the Draft EIR, the City indicated it is likely permit conditions would limit construction hours further than the municipal code. As such, Mitigation Measure MM 3.14-1a has been modified to demonstrate noise-generating construction hours would be limited to 7:00 a.m. to 5:00 p.m. Monday through Friday and prohibited on weekends, unless otherwise permitted by the City, such as when 24-hour drilling may be necessary (see *Section 3 Errata* of this Final EIR, pages 3-8 to 3-11 and pages 3-23 to 3-25). Non-noise generating activities, such as meetings, daily preparations, servicing of equipment, refueling, and other similar activities associated with the project that do not generate construction noise would not be subject to these limited hours unless otherwise specified in applicable permits. CVWD would obtain a Conditional Use Permit (CUP) from the City, which would include an after-hours permit for well drilling, consistent with Section 15.16.170 of the City's Municipal Code.

With implementation of the noise reduction measures included in Mitigation Measure 3.14-1a, limited construction hours, acquisition and compliance with City permits, and temporary housing provisions for residents within 100 feet of injection well drilling, noise levels during construction would be mitigated to less than significant levels.

Noise During Injection Well Operation

Injection well operation would generate noise levels consistent with ambient noise. Pumps used to convey water from the AWTF to the wells and inject it into the groundwater basin would be housed at the WWTP site (see *Section 2.6.2 Purified Water Pump Station* of the Draft EIR). Submersible backflush pumps would be installed within the injection wells themselves, and be located belowground (see *Section 2.6.4 Injection Wells*). Noise generated by backflush pumps would be buffered by both the water in the wells and compacted soils around the well. Backflush pumps are expected to generate a maximum noise level of 69 dBA Leq and are expected to be consistent with existing ambient noise levels (see Impact 3.14.1 in the Draft EIR). Except in the event of an emergency, maintenance visits to the injection wells would occur during daytime hours and include truck noise consistent with existing ambient noise levels. Technology used for the Proposed Project (injection wells, conveyance pipelines, pumps) are well understood and would be designed consistent with appropriate standards for the selected sites, reducing the risk of potential issues at the wells that could result in unplanned noise-generating maintenance activities.

Proximity of Wells at Well Sites #2 and #3 to Homes

Since publication of the Draft EIR, CVWD has continued its discussions with St. Joseph's Church to refine the location of the injection well within Well Sites #2 and #3. In response to feedback, CVWD and St. Joseph's Church have elected to relocate the injection well within Well Site #3 away from the fence behind 1532 Nantucket Court to the corner of the field near Linden Avenue, between the existing light posts and driveway, as shown in Final EIR Figure 2-1 (see following page). Relocating the injection well within Well Site #3 would reduce the number of residential properties that fall within 100 feet of the temporary construction easement for the injection well site from four to none. When measured from the injection well itself, no residential properties fall within 100 feet of the well where drilling would occur (see Figure 2-1). In accordance with refined design drawings for the injection well at the new location within Well Site #3, the injection well would be housed in an underground vault with aboveground controls on a concrete pad nearby. The aboveground controls would be shielded from the street by a block wall designed to also function as a church sign. A visual simulation of the revised injection well is provided in Final EIR Figure 2-2 (see following page, and page 3-21 in *Section 3 Errata* of this Final EIR). The Project Description has identified that only one backflush tank would be constructed and been revised to clarify that the backflush tank would not be constructed at Well Site #3 (see *Section 3 Errata* of this Final EIR, page 3-18). Figure 2-2 shows no backflush tank at the revised location of the injection well at Well Site #3.

Moving the injection well to a different location within Well Site #3 would help address concerns raised by commenters about noise levels at their residences and the St. Joseph's Church Youth Center (located between the homes on Nantucket Court that back into Well Site #3 and the St. Joseph's Church parking lot), as well as concerns regarding the adequacy of Mitigation Measure 3.14-1a. Relocating the well further from residences and the Youth Center would reduce the noise levels experienced by residents and youth center users through an increased distance between noise generating activities, particularly 24 hour well construction, and people as compared to the original location within Well Site #3 as described in the Draft EIR. Relocating the injection well would also reduce potential for vibrations generated by construction activities to affect these properties, because vibrations naturally attenuate quickly across distances. Although the proposed injection well was moved from the location within Well Site #3 originally proposed in the Draft EIR, the environmental analysis included the entirety of Well Site #3, including the proposed new location of the injection well within the site. As such, the Draft EIR's analysis is still applicable to the revised location, and impacts remain less than significant with mitigation measures as described in the Draft EIR and revised per the Errata (see *Section 3 Errata* of this Final EIR).

Figure 2-1: 100-Foot Radius from Revised Injection Well Location within Well Site #3

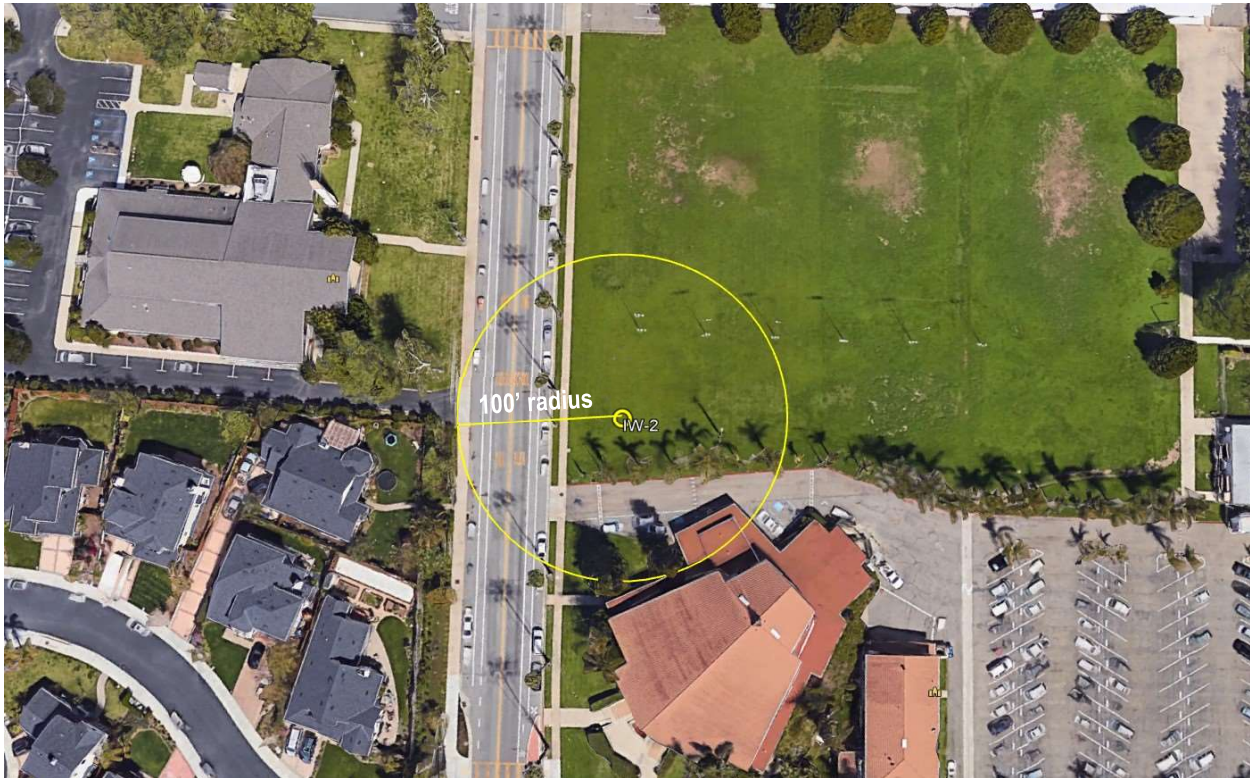
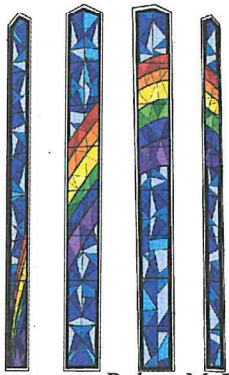


Figure 2-2: Visual Simulation of Revised Well Location within Well Site #3



2.2 Responses to Comment Letters Received during Public Comment Period

CVWD received nine written letters and emails during the public comment period for the Draft EIR, which began on July 1, 2019 and ended on August 30, 2019. The following sections include the letters that were received in their original form, along with written responses in accordance with CEQA Guidelines §15088.



ST. JOSEPH CHURCH IGLESIA DE SAN JOSE

Welcome home. Christ's love and mercy awaits.
Bienvenido a Casa. El amor y la misericordia de
Cristo te esperan.

July 18, 2019

Robert McDonald
Carpinteria Valley Water District
1301 Santa Ynez Ave.
Carpinteria, CA 93013

E-mail: bob@cvwd.net

RE: Comments on Draft EIR for the Carpinteria Advanced Purification Project (CAPP)

Dear Mr. McDonald:

Thank you for the opportunity to comment on the Draft EIR for the CAPP project. As you are aware, the St. Joseph Church property has been identified as a potential location for siting of an Injection Well (Site 2 or Site 3), and therefore we are very interested in following the CAPP project as it evolves during the Environmental Review and City Permitting process.

After reviewing the Draft EIR with several of our Parishioners, we offer the following comments:

Section 3.14 - Noise and Vibration

The draft EIR analyzed the potential noise impacts related to construction, drilling and operating the injection wells. Given the proximity of proposed Injection Well No. 3 to our residential neighbors and our Youth Center building, we have concerns that the potential impacts of construction and operation of the Injection Well will not be adequately addressed by the suggested Mitigation Measure MM 3.14-1a.

Comment
1-1

The Mitigation Measure discussion and "Environmental Commitments" suggest that construction would be limited to times authorized under the City of Carpinteria Municipal Code. However, the discussion also indicates "After-hours permits may be acquired if determined that is required and serves the public interest". We suggest that proper noise and vibration mitigation would preclude construction on weekends out of respect to the residential neighbors and to our Parishioners (especially on Sundays).

Comment
1-2

In addition, we submit that the suggested one week notice of pending construction to affected residents should be increased to at least two weeks, especially in the event that the affected neighbors request temporary accommodations.

Comment
1-3

St. Joseph Church strives to maintain an excellent relationship with our residential neighbors and while we support the CAPP project in concept, it is important that the impacts to neighbors as a result of this project are minimized to the maximum extent allowed under CEQA and City regulations and policies. If the CAPP project cannot adequately address the concerns of the neighbors, then St. Joseph Church cannot, in conscience, accept a well on its site.

Comment
1-4

Nothing in this letter shall be construed as a waiver of any of our rights nor is it an acceptance of the project. Prior to making a decision to sell or lease ecclesiastical property, the church will consult persons who have expertise in these matters.

Comment
1-5

Again, thank you for the opportunity to comment, and we look forward to continued cooperation as the CAPP project evolves.

Sincerely,

Reverend Monsignor Richard Martini
Pastor

Letter 1: Reverend Monsignor Richard Martini, St. Joseph Church

Response to Comment 1-1

Master Response – Noise and Vibration addresses the concerns related to the proximity of proposed injection well at St. Joseph’s Church to residences and the church’s Youth Center building. As described in that response, CVWD has been coordinating with St. Joseph’s Church to relocate the injection well within Well Site #3 further from these structures.

Response to Comment 1-2

As described in *Section 2.7.3* of the Project Description, injection well construction would require 24-hour drilling. Master Response – Noise and Vibration includes a modification to Mitigation Measure MM 3.14-1a to restrict noise-generating construction hours to weekdays 7:00 a.m. to 5:00 p.m., avoiding construction on weekends unless necessary for successful project implementation (see *Section 3 Errata*, pages 3-8 to 3-11 and pages 3-23 to 3-25 of this Final EIR). Injection well construction requires 24-hour drilling to maintain the integrity of the borehole and avoid damage to aquifer materials, as described in Master Response – Noise and Vibration, *Construction Noise at Injection Well Site #3*. CVWD has met with well contractors and St. Joseph’s Church and confirmed injection well drilling could be paused for 1 to 2 hours during mass on Sunday without adversely affecting well construction. Mitigation Measure MM 3.14-1a has been modified to reflect drilling at Well Site #3 will not occur during Sunday mass-times (see *Section 3 Errata*, pages 3-8 to 3-9 and pages 3-23 to 3-24 of this Final EIR).

Response to Comment 1-3

Mitigation Measure 3.14-1a has been modified to require construction notifications a minimum of 2 weeks in advance of construction (see *Section 3 Errata*, page 3-11 and 3-25 of this Final EIR).

Response to Comment 1-4

Thank you for your support of the CAPP and its benefits to the community. As noted in Master Response – Noise and Vibration, CVWD has been coordinating with St. Joseph’s Church to find a suitable location for the injection well at Well Site #3 away from residences to reduce potential noise impacts to neighbors.

Response to Comment 1-5

This comment is noted.

From: gblair1409@aol.com

Date: August 6, 2019 at 10:01:52 PM PDT

To: bob@cvwd.net

Dear Mr. McDonald,

The scale, cost and impact upon the Carpinteria community and residents negatively impacted by the location of one of the injection well sites is now becoming widely apparent. As the former Executive Officer of the Superior Courts of Santa Barbara County for 34 years, many concerned residents have come to me for advice. In addition, the directly impacted Seacoast Homeowner's Association President, (who is an engineer) has discussed with me his legitimate concerns on the negative impacts of the injection well proposed site #2 on, *inter alia*, the negative impact on Association property values, including but not limited to, unacceptable noise levels, excessive ground vibrations and other potential destruction such as cracked foundations, broken water lines, lighting, ingress and egress of maintenance vehicles, structure height etc.

Comment
2-1

Comment
2-2

I have contacted numerous homeowners, including engineering professionals who have reviewed the proposed injection well site #2 and state that the location on Catholic Church property is totally inappropriate and should be elsewhere. This is not going to "fly below the radar" just because there was one public hearing held at an inconvenient time of day.

Comment
2-3

Comment
2-4

I hereby request that you immediately provide me with any photos, sketches, diagrams, drawings, and written materials showing the exact location of alternative site #6 at the Franklin Creek Park which was quickly dismissed as a viable option because a single tree would allegedly have to be removed. As you know, this location is city owned property and a much more appropriate site than alternative site #2 right up against or adjacent to residential property. If required, I can file a Public Records Act Request pursuant to Government Code Section 6250, *et seq.* to acquire this information

Comment
2-5

It is important to immediately determine:

1. What is included in the proposed \$20-25 million budget for this project?
2. Have all affected homeowners and the Seacoast HOA been formally noticed about the potential damage that could accrue to their properties?
3. Who is the legal counsel who represents the CVWD?
4. What, if any, definitive action is intended to be taken by you and the Water Board, and if action is planned, when, where, and what is that action?

Comment
2-6

Comment
2-7

Comment
2-8

Comment
2-9

5. Apparently, a brief discussion has been held with the St. Joseph's Catholic Church. Has their attorney, and its real estate division been notified of this proposed intrusive project on their church property?

Comment
2-10

Many of us believe that the overall project itself has worthwhile goals. But your method for achieving them is seriously flawed. We will adamantly oppose the location of injection well site #2 and believe there needs to a very open and public discussion of the magnitude of this project before it becomes a legal issue that would ultimately involve you, the Water District Board, the Carpinteria Community, the Catholic Church and other parties and agencies.

Comment
2-11

I ultimately would like to be able to support this project. But an injection well at site #2 is a non-starter.

Sincerely,

Gary Blair

Letter 2: Gary Blair, Resident

Response to Comment 2-1

All environmental impacts required for disclosure under CEQA are addressed in *Section 3 Environmental Analysis* in the Draft EIR.

Response to Comment 2-2

Environmental impacts of injection well construction and operation are addressed in *Section 3 Environmental Analysis* of the Draft EIR. The vibration analysis in *Section 3.14.4* of the Draft EIR (page 3.14-16 to 3.14-17) did not identify significant secondary effects on existing utilities from well construction. Additionally, *Section 3.20 Utilities and Service Systems* in the Draft EIR concluded the Proposed Project would avoid existing utility infrastructure and would not require relocation or replacement of existing utilities (see pages 3.20-6 and 3.20-7 of the Draft EIR).

Response to Comment 2-3

Hydrogeologic analysis was completed for the Proposed Project to determine where within the groundwater basin suitable conditions existed for groundwater injection with advanced treated water. Specifically, that injection was most suitable in the confined aquifer within CVWD's jurisdiction. The confined aquifer is suitable for the Proposed Project because it allows CVWD to better predict where the injected advanced treated water would flow within the groundwater basin, and to extract more of the water that is injected than if the areas where unconfined aquifer exist, namely north of Highway 192, were used. Once this area was identified, properties within the suitable area were identified based on available land, accessibility, and potential for securing an easement or purchase to secure the site. Additionally, the hydrogeology requires that the injection wells be far enough from one another to avoid excessive hydraulic interference, as well as far enough from CVWD's existing extraction wells and other private extraction wells to maintain the required residences time per State Water Resources Control Board (SWRCB) Division of Drinking Water (DDW) regulations for potable reuse.

The location of the injection well within Well Site #3 as considered in the Draft EIR (i.e., near the property line of the homes on Nantucket Court) was selected to minimize long-term visual impacts and to avoid impacting use of the field. Further discussion with St. Joseph's Church has led to a revised location for the injection well within Well Site #3, as described in Master Response – Noise and Vibration, above, that still meets the hydrogeologic criteria for the Proposed Project. The Project Description has been updated to include a description of siting criteria used during project development (see *Section 3 Errata*, pages 3-16 to 3-17 of this Final EIR).

Response to Comment 2-4

Outreach and notification required under CEQA was completed for the Proposed Project, as described in *Section 1.3 Environmental Review Process* of the Draft EIR (page 1-3) and in *Section 1.4.1 CEQA EIR Process* of this Final EIR (see pages 1-3 through 1-4). A Notice of Preparation was issued on January 7, 2019, scoping comment period from January 7 to February 9, 2019, and a publicly noticed scoping meeting held on January 24, 2019. Notices for the scoping meeting were published in the Coastal View News on January 10 and January 17, 2019. A Notice of Availability was issued on July 1, 2019, and published in the Coastal View News on July 4, July 11, and July 18, 2019. A public review period was held from July 1 through August 30, 2019 to provide opportunity for members of the public to review and comment on the Draft EIR. A publicly noticed Public Meeting was held on July 18, 2019, and additional notices sent to residences in the immediate vicinity of the proposed injection well at Well Site #3. The public meeting was held on a Thursday to encourage additional attendance by members of the public already in the vicinity for the Farmers Market, and in the evening to allow working residents to participate. The public meeting was also advertised on social

media, including CVWD's Facebook page, and information about the meeting shared on Nextdoor. Carpinteria Sanitary District (CSD) also shared meeting information on its Facebook page and website. The County of Santa Barbara – Public Works and Santa Barbara County Project Clean Water both shared CVWD's Facebook post about the public meeting. Additionally, a flyer was created and included as a bill insert to all CVWD customers.

The CEQA process is just one step in many of the project approval process. Following approval of the Proposed Project and certification of the EIR by CVWD's Board of Directors, several additional approvals will be necessary, including CSD Boards of Directors approval for construction of the AWPf, permitting approvals by regulatory agencies and jurisdictions (see Table 2-4 of the Draft EIR on page 2-25), and purchase or easement negotiations with landowners for proposed well sites.

Response to Comment 2-5

The Draft EIR has been structured to provide project-level CEQA coverage for the location of injection wells anywhere within the identified Well Sites. While only three Well Sites would ultimately be selected for build out (and initially only two for the first phase of the Proposed Project), six parcels were initially considered during the Initial Study, and was refined to five parcels as additional site evaluations were conducted. Well Site #5 at Franklin Park was found to be infeasible because it would require construction within the 50-foot creek setback, in violation of the City's *General Plan/Local Coastal Plan* (City of Carpinteria, 2003), constraining the construction area and well location. Additionally, the use of Well Site #5 would require removal of a high number of Oak trees. Final EIR Figure 2-3 (see following page) shows Well Site #5 at Franklin Park and the 50-foot setback. As seen in the figure, the remaining portion of the site would constrain the potential well location within the site. Although aerial photos showed limited number of trees, as of a site walk on January 24, 2019, the site had been planted with young coast live oak (noted in Appendix D, Biological Resources Assessment of the Draft EIR), further reducing the feasibility of the site. The City's *General Plan/Local Coastal Plan* Objective OSC-7 Conserve Native Plant Communities includes Policy OSC-7a, which calls for protection oak trees through development standards (City of Carpinteria, 2003). The oaks now growing in Franklin Park are shown in Final EIR Figure 2-4, photographed in January 2019. For these reasons, Well Site #5 was found to be unsuitable for an injection well.

Figure 2-3: Injection Well Site #5 Showing 50-foot Setback from Franklin Creek

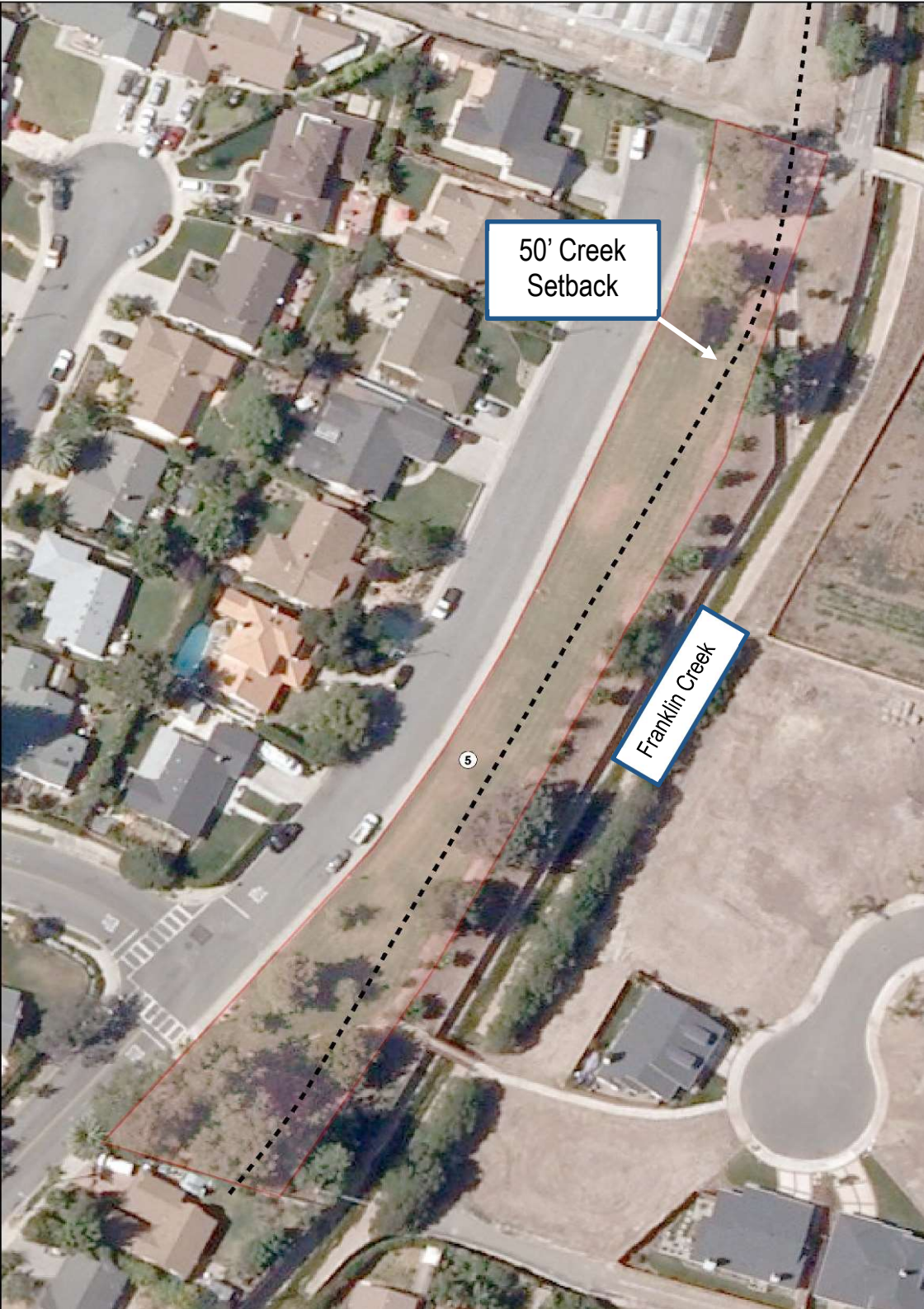


Figure 2-4: Injection Well Site #5 on January 24, 2019 with New Tree Plantings



Response to Comment 2-6

The cost estimate for the Proposed Project includes design and construction of the facilities described in the Project Description, including the AWPf, injection wells, monitoring wells, ocean discharge pipe modifications, and transmission pipeline. At the time of the Draft EIR and public meeting in July 2019, the Proposed Project had been estimated to cost \$20-\$25 million. As of the writing of this Final EIR (November 2019), the Proposed Project cost estimate had been refined by the engineering team and is estimated to cost \$32 million (in 2022 dollars) due to changes in materials costs.

Response to Comment 2-7

CEQA noticing protocols have been followed, with the Notice of Preparation issued on January 7, 2019 and Notice of Availability for the Draft EIR issued on July 1, 2019. Notices were published in the Coastal View Newspaper on January 10 and January 17, 2019 for the Notice of Preparation and Scoping Meeting, and on July 4, July 11, and July 18, 2019 for the Notice of Availability and Public Meeting. All district customers were directly mailed a notice as well as advertised on social media and CVWD websites. Additionally, residences within 100 feet of the proposed injection well at Well Site #3 were contacted directly by CVWD to inform them of the NOA and public meeting. As described in the Draft EIR (*Section 3 Environmental Analysis*), all potential environmental impacts can be reduced to less than significant with mitigation. No damage is anticipated to properties as a result of injection well drilling or operation and maintenance.

Response to Comment 2-8

This question is not related to the environmental analysis under CEQA.

Response to Comment 2-9

Table 2-4 in the Draft EIR *Section 2 Project Description* (page 2-25) identifies the permits and approvals anticipated to be required for the Proposed Project. CVWD would acquire permits through an application process to each regulatory

agency or municipality. Depending on the permit, this application process may require a project description, technical analysis of water quality, and consideration of environmental impacts, among other requirements. When permits are issued, they may contain additional requirements for the Proposed Project. CVWD and CSD shall comply with all permit requirements.

CEQA requires the Final EIR, including this Response to Comments, be certified by CVWD's Board of Directors prior to approving the Proposed Project (CEQA Guidelines §15090). This Final EIR shall be presented to CVWD's Board of Directors for consideration during approval of the CAPP. Written responses to comments must be provided at least 10 days prior to certification to public agencies that submitted comments on the Draft EIR (CEQA Guidelines §15088). CVWD shall make the Final EIR, including this Response to Comments, publicly available through its CAPP website (<http://cvwd.net/capp/public-participation-meetings/#top>) at least 10 days in advance of the certification hearing. CVWD's Board of Directors will consider this Final EIR and Project approval at a public meeting to be held December 11, 2019.

Response to Comment 2-10

St. Joseph's Church was noticed regarding the Proposed Project. CVWD has been meeting with St. Joseph's Church to discuss the Proposed Project, determine the potential for use of the site, and preferred location of the well within the site. In coordination with St. Joseph's Church, CVWD has revised the preferred location for the injection well within Well Site #3 to the far side of the field (see Master Response – Noise and Vibration, and Final EIR Figure 2-1, above).

Response to Comment 2-11

This comment is not related to the environmental analysis under CEQA.



1574 Seacoast Way, Carpinteria, CA 93013

August 28, 2019

Mr. Bob McDonald
Carpinteria Valley Water District
1301 Santa Ynez Avenue
Carpinteria, CA 93013



Dear Mr. McDonald:

I am the President of Seacoast Village Homeowner's Association, a large residential community of 55 single family homes including CVWD ratepayers in the City of Carpinteria. Our Board of Trustees is aware of the Carpinteria Advanced Purification Project (CAPP) and the recent 774-page draft EIR report. The purpose of this letter is to convey our strong opposition to the proposed placement of any water injection wells on any or all of proposed sites #2 and #3, which are either adjacent to or in very close proximity to residential homes of our HOA members.

Comment
3-1

Let me be clear. Our HOA fully understands and supports the overall goals of the CAPP Project sponsored by the CVWD. However, we must categorically reject the proposed placement of injection wells which are too close to our residents, which in some cases, with their fences, lighting and maintenance pathways, are within 25 feet of members' bedrooms or living rooms.

Since construction was completed in 1985, the Seacoast Village HOA has maintained a close and cordial relationship with the adjacent St. Joseph Catholic Church and its current head priest, Father Martini. Our HOA now greatly appreciates the Church's and Father Martini's neighborly position of not agreeing with CVWD's potential placement (set forth in the draft EIR) of any proposed injection wells on its church property. The church's position has been communicated in a July 18th letter to Mr. McDonald, the CVWD Manager, as not possible for the Church to agree to "in good conscience."

Comment
3-2

There are other alternate sites available to the water district for the placement of these water injection wells that are far more appropriate. We know and are sure that through a reasonable accommodation your district will opt to use one or more of these other alternative sites. The question you must ask and answer is: "How would you like one of these injection wells constructed, operated, and maintained within 20 or 25 feet of your

Comment
3-3

bedroom or living room?" We have been advised that the proposed locations for sites #2 and #3 have negatively impacted the property value of HOA homes and must legally be made part of the property's disclosure to a prospective buyer in the event a homeowner's property goes on the market. If these injection well proposed sites, particularly Site #2, were to be constructed, this would constitute a diminution of and in effect a taking of private property. We know that you would not want that for your home, and our HOA is firmly committed that we do not want that for any of our homes.

Comment
3-4

We respectfully look forward to an amicable resolution of these potential issues, by your Board pursuing its other alternative site locations. We believe that the position already communicated to the CVWD Manager from St. Joseph Church should be sufficient to eliminate the placement of any injection wells on St. Joseph's property. Representatives of our HOA have also met with representatives of the City of Carpinteria, Santa Barbara County, the State of California, and Federal environmental officials which makes any thought of future legal action unnecessary.

Comment
3-5

On behalf of the Seacoast Village HOA, we want to thank you for your consideration of this critically important issue.

Respectfully yours,

/ original signed /

George Lehtinen
President
Seacoast Village Homeowner's Association

Cc: Father Martini, St. Joseph's Church
Bartlein & Co., Attn: Peterson, 3944 State St. #200, Santa Barbara, CA 93015
✓ Gary Blair

Letter 3: George Lehtinen, Seacoast Village Homeowner's Association

Response to Comment 3-1

As described in Master Response – Noise and Vibration, the injection well at Well Site #3 would be relocated further from Seacoast Homeowner's Association residences than as shown in the visual simulation for Well Site #3 in Figure 3.1-2 on page 3.1-9 of the Draft EIR. The revised location, further from Seacoast Homeowner's Association is shown in Final EIR Figure 2-1 (above).

Response to Comment 3-2

St. Joseph's Church submitted a comment letter, included here as Letter # 1, that expressed concern about the location of the well within Well Site #3. CVWD is coordinating with St. Joseph's Church to select an appropriate site for the injection well within Well Site #3 to reduce potential impacts to neighbors (see Master Response – Noise and Vibration and Figure 2-1, above). Although the injection well would be relocated, it would remain within Well Site #3, the entire parcel for which was included in the environmental analysis completed in the Draft EIR.

Response to Comment 3-3

The Draft EIR *Section 2 Project Description* includes five potential well sites, and notes that only three would ultimately be selected. Hydrogeologic analysis was completed for the groundwater basin to develop siting criteria for identification of potential injection well sites. Hydrogeologic analysis identified which portions of the groundwater basin were suitable for groundwater recharge, within which Proposed Project's recharge facilities could be located. Siting criteria within this area included minimum distance from CVWD's existing extraction wells and private extraction wells, minimum distance between injection wells, size and accessibility of properties that could provide construction area and house potential injection wells and related facilities. The Project Description has been revised to clearly describe these siting criteria (see *Section 3 Errata*, pages 3-16 through 3-17 of this Final EIR).

Response to Comment 3-4

The Draft EIR does not consider the Proposed Project's potential effect on property value, which is not an environmental impact. The Proposed Project is consistent with existing land uses and land use regulations, as described in *Section 3.12.14* on pages 3.12-5 through 3.12-8 of the Draft EIR.

Response to Comment 3-5

Letter #1 contains the comments received from St. Joseph's Church regarding the Proposed Project and location of the well at Well Site #3, and Response to Comment 1-1 through 1-6 contains responses to the comments contained in Letter #1. As described in Master Response – Noise and Vibration, CVWD has coordinated with St. Joseph's Church to relocate the proposed injection well at Well Site #3 to move it further from the Seacoast Village community.

August 29, 2019

Mr. Bob McDonald
Carpinteria Valley Water District
1301 Santa Ynez Ave.
Carpinteria, CA 93013

Re: Comments on Carpinteria Advanced Purification Project Draft EIR

Dear Mr. McDonald,

I am a 35-year resident of Seacoast Village in Carpinteria and offer the following comments in response to the draft EIR report on the proposed Carpinteria Advanced Purification Project, hereinafter referred to as "CAPP."

A. Overall Comments

It is commendable that the Carpinteria Valley Water District Directors have sought to provide a long-term solution to the potential water shortages that will be experienced during continued future drought cycles to which Carpinterians and south coast residents will no doubt be subjected. The purification and re-use of waste water that would otherwise be dumped into the ocean waters with a lesser level of treatment reduces ocean pollution and is a more efficient utilization of limited water resources.

Comment
4-1

Our primary objection is not about the overall goals of the CAPP. Our strong objection is with the potential location of water injection wells on alternative sites #2 and #3 which would be located on St. Joseph Church property directly behind and adjacent to residential homes in Seacoast Village, (and homes on some streets directly adjacent to the St. Joseph Church property). Father Martini, who has been a good neighbor to Seacoast Village, has communicated the church's position to you in his July 18, 2019 letter stating in pertinent part that it "cannot in conscience accept a well on its site" if the concerns of its neighbors cannot be met.

Comment
4-2

The concerns of our residents can only be met if the CVWD ultimately pursues alternative sites other than those on St. Joseph Church property. A letter, dated August 28th (**see attached**), from our Seacoast Village Homeowners Board of Directors has been delivered to you stating our strong objections to the location of water injection well on alternate sites #2 and #3. The position of our HOA, in conjunction with the church's position, provides the impetus to pursue other more appropriate site alternatives. By reference, the Seacoast HOA letter cited above, is hereby fully incorporated into my comments as part of this formal response to the CAPP draft EIR.

Comment
4-3

It is recognized that this EIR is a draft report and the CVWD has not yet officially adopted a final EIR. But it remains unsettling that certain proposed locations, especially site #2, are even

Comment
4-4

contained as a possibility in the draft report. The peaceful enjoyment of our homes, their property values, and our lives would be permanently degraded if these wells and/or storage tanks were located in such close proximity to our homes.

B. Other Comments

1. Noise & Lighting – Short and Long-Term; Code Violations

Noise associated with the construction of the water injection wells will violate sections of the Carpinteria Municipal Code. You have informed me that the construction will take place 24 x 7 for up to 3-6 weeks to a depth of some 1200 feet (the equivalent of the length of 4 football fields). The draft EIR report at page 2-28 further states that well drilling may require 24-hour drilling. With the high costs of drill operator rigs, it is certain that the drilling will not be limited to an 8-hour day. Indeed, 24 hours per day will be the norm. The noise levels will exceed 110 decibels. All reasonable persons would object to such noise levels directly next to their homes whether it be for 8 hours a day or even worse, for 24 hours for a 21-42 day period of time. It is not a workable solution to just tell them that they, their pets, their business work, etc., can go live and exist in a hotel during construction. All of us have already lived through major disruption from the recent CALTRANS freeway bridge construction as well as the CVWD construction of the well in El Carro Park years ago.

Comment
4-5

Comment
4-6

Comment
4-7

Comment
4-8

Once constructed, the injection wells would pump some 1.2 million gallons of water into the groundwater basin on a daily basis. There will be noise associated with this pumping which will irritate those residing close to it, and maintenance trucks will be traversing over the easements to the well locations. If there is a break or if other problems develop on site, this activity will escalate and intensify.

Comment
4-9

In addition, figure 2-5 at page 2-12 shows a photograph of a typical aboveground well with the streetlight type spotlight above it which would presumably be lit all night. This will shine into the windows of residents if the well is located close to them. Further, the possible construction of a holding tank as high as 30-feet will be a major eye sore if located too close to residential homes.

Comment
4-10

Comment
4-11

Figure 3.1-2 at page 3.1-9 shows a photo shopped picture of an injection well directly attached to the rear wall of 1532 Nantucket Court located in Seacoast Village. This would be illegal and violative of basic setback requirements set forth in the Building Code.

Comment
4-12

2. Excessive Ground Vibration

There is nothing that can be done to reduce the thunderous ground vibration from pile drivers drilling constantly to a depth of 1200 feet. (See Section 3.14). Doing it so close to residences will, *inter alia*, surely cause damage such as broken water pipes, cracked drywall, damaged decks and outdoor structures, and/or cracked foundations. There have already been broken water pipes in several homes near the Linden Street bridge during use of pile drivers by CALTRANS during recent reconstruction of the overpass and drilling was not anywhere near as deep as will take place for the injection wells.

Comment
4-13

In short, there are short-term and long-term negative impacts that will result from the construction of water injection wells and/or storage tanks which are constructed, installed, and operated too close to residential homes.

Comment
4-13
continued

3. Decreased Property Values

I have been advised by counsel that homeowners located close to a proposed injection well site, especially alternative site #2, will have to disclose the potential location of the water injection well and/or storage tank to any prospective buyer of their properties. If actually constructed, there will be a *de facto* decline in the value of several homes that are close to the well location which has an estimated 5,000 square foot footprint, not to even mention the construction of a water holding tank up to 30 feet tall.

Comment
4-14

4. Project Costs

The stated projected project costs are currently \$20-25 million. Construction costs are rising each year and a recent *Pacific Business Times* article reported that construction costs are increasing as much as 13% annually. Although this project involves a very specialized type of construction, costs will increase significantly by the time, bids are issued, contracts are executed and construction commences.

As an elected Trustee on the Santa Barbara County Retirement Board (SBCERS) and a member of the Measure U Citizen's Bond Oversight Committee, I have witnessed the recent escalation of construction costs. We have been forced to seek through our school district and Board, an additional \$18 million of state grant moneys because the projected costs that were estimated to be covered by our \$90 million Measure U Bond have escalated dramatically since its passage. These grant requests are in a 2-3-year cue.

Comment
4-15

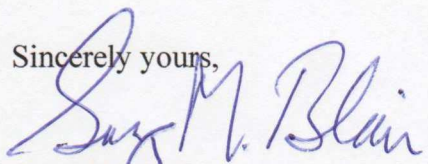
It is therefore suggested that the surface spreading option, discussed in Section 4.7 not be categorically rejected since it is a less costly alternative, even though it may not meet all of the CAPP goals. It is understood that your goal is to seek 50% funding of the costs through grants. But, this may or not materialize, and any cost increases to the ratepayers needs to be given due consideration.

C. Summary

The CAPP project is commendable, although costly and potentially disruptive to many Carpinteria citizens and homeowners. The location of water injection wells located on St. Joseph Church property is inappropriate and too close to residential homes. The Carpinteria Valley Water Board should recognize this and pursue other alternative sites.

Comment
4-16

Thank you for this opportunity to provide comments on the CAPP draft EIR.

Sincerely yours,


Gary M. Blair

Attachment

Cc: Father Martini, St. Joseph Church

Letter 4: Gary Blair, Resident

Response to Comment 4-1

Yes, the Proposed Project would create a new, drought-proof, reliable supply of local water, and would reduce vulnerabilities in CVWD's water supplies.

Response to Comment 4-2

Comments were received from St. Joseph's Church regarding the potential location of the proposed injection well at Well Site #3. Written comments are included here as Letter #1, with CVWD's responses are provided in Response to Comments 1-1 through 1-6. As noted in Master Response – Noise and Vibration, CVWD has been coordinating with St. Joseph's Church to relocate the proposed injection well within Well Site #3 further from Seacoast Village homes. See Final EIR Figure 2-1 (above) for the proposed location of the injection well within Well Site #3.

Response to Comment 4-3

The Draft EIR *Section 2 Project Description* includes five potential well sites, and notes that only three would ultimately be selected. Potential well sites were identified based on siting criteria (see Response to Comment 3-4, and revised Project Description in *Section 3 Errata* of this Final EIR). Alternative recharge options were evaluated in CVWD's 2016 *Recycled Water Facilities Plan*, but ultimately found to be unsuitable for achieving the project goals.

Response to Comment 4-4

All environmental impacts required for disclosure under CEQA are addressed in the Draft EIR *Section 3 Environmental Analysis*.

Response to Comment 4-5

As described in the Draft EIR *Section 3.14.4*, Mitigation Measure 3.14-1a on page 3.14-14 and Master Response – Noise and Vibration, CVWD would acquire an after-hours permit from the City of Carpinteria consistent with Section 15.16.170 of the Municipal Code.

Response to Comment 4-6

Section 3.14.4 of the Draft EIR included the results of noise modeling completed for the Proposed Project (see pages 3.14-11 to 3.14-13). Noise modeling factors in sound levels generated by equipment, distance from construction activities, daytime versus nighttime noise, and sound dampening measures. 24-hour well drilling in close proximity to homes was found to be a potentially significant impact. As such, Mitigation Measure 3.14-1a would be implemented to require sound dampening measures be implemented. Previous well drilling activities that implemented the sound dampening measures in Mitigation Measure 3.14-1a found such measures to effectively reduce noise. The modeling found that noise levels would be within legal limits at greater than 100 feet from the injection well during drilling. As described in Master Response – Noise and Vibration, CVWD has been coordinating with St. Joseph's Church to relocate the injection well on Well Site #3 further from homes (see Figure 2-1, above). As a result of this relocation within the site, Seacoast Village homes would be a minimum of 400 feet from drilling, and no residences would be within 100 feet of the injection well itself.

Response to Comment 4-7

Temporary housing is a common mitigation measure for excessive noise and is consistent with the City's recommendations. By relocating the injection well within Well Site #3 to be further from residences, no residences would be within the 100-foot radius from drilling where noise generation would exceed the City's noise thresholds for construction once sound dampening measures included in Mitigation Measure 3.14-1a are implemented. See Master Response – Noise and Vibration.

Response to Comment 4-8

Commenter's concerns are noted. Construction of the Proposed Project is expected to begin in January 2021. Caltrans construction is projected to be complete in Spring 2020, and not overlap with construction of the Proposed Project. Additionally, Mitigation Measure CUM-1 requires coordination with Caltrans should construction of the Proposed Project occur concurrently with Caltrans construction on U.S. Highway 101 in Carpinteria.

Response to Comment 4-9

Operation of the injection wells is not expected to produce noise levels above existing ambient levels. See Master Response – Noise and Vibration for clarification on noise from operation of the injection wells.

Response to Comment 4-10

As noted on page 3.1-10, in *Section 3.1 Aesthetics* of the Draft EIR, lighting at the injection wells would remain off and only be used if a problem occurs at night and light is needed to address the issue. All lighting would be directed downward and shielded, consistent with Mitigation Measure MM 3.1-1. The Project Description has been revised to provide clarification of lighting design (see *Section 3 Errata*, page 3-17 of this Final EIR).

Response to Comment 4-11

The backflush tank would only be installed at one Well Site, and would not be constructed at Well Site #3. The Project Description has been revised to clarify the backflush tank would only be located at Well Site #1, #4, or #6 (see *Section 3 Errata*, page 3-18 of this Final EIR).

Response to Comment 4-12

As described in the Master Response – Noise and Vibration, the injection well at Well Site #3 would be relocated away from residences. Final EIR Figure 2-2 (above) shows what the injection well is expected to look like at the new location.

Response to Comment 4-13

As described in Master Response – Noise and Vibration, pile driving would not be used for injection well construction. Because vibrations naturally attenuate quickly across distance, and the injection well has been relocated within Well Site #3 further from residences, vibratory impacts from well drilling would be less than significant.

Response to Comment 4-14

The Draft EIR does not consider the Proposed Project's potential effect on property value, which is not an environmental impact. The Proposed Project is consistent with existing land uses and land use regulations, as described in *Section 3.12.14* on pages 3.12-5 through 3.12-8 of the Draft EIR.

Response to Comment 4-15

The Surface Spreading Alternative would require substantial land purchase (7 acres) and would not be located in an area as suitable for groundwater recharge as the Proposed Project. The Proposed Project was located to take advantage of the geology of the groundwater basin and existing infrastructure to minimize costs to ratepayers, while still meeting the objectives of improved supply reliability. CVWD's *Recycled Water Facilities Plan* (CVWD, 2016), where the alternative was developed, estimated the Surface Spreading Alternative's cost as \$20.2 million, within the low-range of the Proposed Project's \$20-\$25 million expected cost estimate at the time of that analysis. Note that the Proposed Project costs have been refined over the last few months to \$32 million (in 2022 dollars).

Response to Comment 4-16

As described in Master Response – Noise and Vibration, and shown in Final EIR Figure 2-1 (above), the proposed injection well at Well Site #3 has been relocated near Linden Avenue, on the far side of the field from the Seacoast Village community. Relocation of the injection well would reduce potential noise and vibratory impacts to nearby residences.

DEPARTMENT OF TRANSPORTATION

CALTRANS DISTRICT 5
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Making Conservation
a California Way of Life.

August 29, 2019

SB-101-3.05
SCH# 2019011016

Robert McDonald
Carpinteria Valley Water District
1301 Santa Ynez Avenue
Carpinteria, CA 93013

COMMENTS FOR THE DRAFT ENVIRONMENTAL IMPACT REPORT (EIR) FOR THE
CARPINTERIA ADVANCED PURIFICATION PROJECT

Dear Mr. McDonald:

The California Department of Transportation (Caltrans) appreciates the opportunity to review the draft Environmental Impact Report (EIR) for the Carpinteria Advanced Purification Project (CAPP). Caltrans has reviewed the project and offers the following comments:

Caltrans supports local planning efforts that are consistent with State planning priorities intended to promote equity, strengthen the economy, protect the environment, and promote public health and safety. We accomplish this by working with local jurisdictions to achieve a shared vision of how the transportation system should and can accommodate interregional and local travel.

Comment
5-1

Caltrans submitted the attached NOP comment letter dated February 6, 2019, which continues to be applicable to the CAPP project. As discussed in the draft EIR, coordination with Caltrans on this Project will be necessary, as well as obtaining encroachment permits.

Comment
5-2

We look forward to continued coordination with the Water District on this project. If you have any questions, or need further clarification on items discussed above, please contact me at (805) 549-3131 or ingrid.mcroberts@dot.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Ingrid McRoberts".

Ingrid McRoberts
Development Review Coordinator
District 5, LD-IGR South Branch

DEPARTMENT OF TRANSPORTATION

CALTRANS DISTRICT 5
50 HIGUERA STREET
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*Making Conservation
a California Way of Life.*

February 6, 2019

SB-101-3.05
SCH# 2019011016

Robert McDonald
Carpinteria Valley Water District
1301 Santa Ynez Avenue
Carpinteria, CA 93013

**COMMENTS FOR THE NOTICE OF PREPARATION (NOP) OF THE DRAFT
ENVIRONMENTAL IMPACT REPORT (EIR) FOR THE CARPINTERIA ADVANCED
PURIFICATION PROJECT**

Dear Mr. McDonald:

The California Department of Transportation (Caltrans) appreciates the opportunity to review the Notice of Preparation (NOP) of the draft Environmental Impact Report (EIR) for the Carpinteria Advanced Purification Project. Caltrans has reviewed the project and offers the following comments:

Encroachment Permits:

Please be aware any work within the State's right-of-way will require an encroachment permit from Caltrans, and must be done to our engineering and environmental standards, and at no cost to the State. The conditions of approval and the requirements for the encroachment permit are issued at the sole discretion of the Permits Office, and nothing in this letter shall be implied as limiting those future conditioned and requirements. For more information regarding the encroachment permit process, please visit our Encroachment Permit Website at: <http://www.dot.ca.gov/trafficops/ep/index.html>.

Comment
5-3

Please refer to Chapter 17 of the Project Development Procedures Manual (PDPM) regarding existing and proposed manholes and piping located within or adjacent to the Caltrans right of way. Crossing under the freeway will need to be fully encased from 5 feet outside the State Freeway Right of Way on either side of the freeway <http://www.dot.ca.gov/design/manuals/pdpm/chapter/chapt17.pdf>.

Comment
5-4

Plans shall be prepared by a Registered Civil Engineer and shall have a pre-submittal meeting with the District Permit Engineer prior to application due to the complexity of the proposed project. Engineering plan details may be found under "Applications/Forms" at <http://www.dot.ca.gov/trafficops/ep/>.

Comment
5-5

Mr. Robert McDonald
February 6, 2019
Page 2

Environmental:

Please be aware of the wetland on the northwest corner of US 101 at Linden Avenue, between the Linden Avenue remnant and the Linden Avenue overcrossing abutment. As a part of the Caltrans project, an enhancement planting will be provided by Caltrans as a mitigation for impacts to the existing wetlands in this quadrant. It is likely that the mitigation planting will occur prior to construction of the proposed pipeline. The site will require restoration and monitoring for success if it is disturbed during construction of the proposed pipeline. Additionally, irrigation controls will be installed in the area for the planting project and should not be disturbed.

Comment
5-6

Comment
5-7

Hydraulics:

Caltrans has found a high groundwater level on Highway 101 at Linden Avenue. The proposed project should not increase groundwater to that location.

Comment
5-8

We look forward to continued coordination with the Water District on this project. If you have any questions, or need further clarification on items discussed above, please contact me at (805) 549-3131 or ingrid.mcroberts@dot.ca.gov.

Sincerely,



Ingrid McRoberts
Development Review Coordinator
District 5, LD-IGR South Branch

Letter 5: Ingrid McRoberts, California Department of Transportation, Caltrans District 5

Response to Comment 5-1

Comment is noted.

Response to Comment 5-2

CVWD will coordinate with Caltrans as necessary and obtain an encroachment permit from Caltrans as necessary (see Table 2-4 Permits and Approvals in the Draft EIR, *Section 2.9*, page 2-25).

Response to Comment 5-3

CVWD will obtain an encroachment permit from Caltrans as necessary (see Table 2-4 Permits and Approvals in the Draft EIR, *Section 2.9*, page 2-25). *Section 2.10 Environmental Commitments* has been revised to clarify coordination with Caltrans as appropriate (see *Section 3 Errata*, page 3-20 of this Final EIR).

Response to Comment 5-4

As described in *Section 2.6.3* of the Draft EIR (page 2-10), the crossing of U.S. Highway 101 at Linden Street Overpass is being constructed as part of Caltrans' bridge upgrades at Linden Avenue.

Response to Comment 5-5

CVWD and its design engineers shall schedule a pre-submittal meeting with Caltrans's District Permit Engineer when applying for an encroachment permit, consistent with permitting requirements.

Response to Comment 5-6

The Biological Resources Assessment, included in the Draft EIR as Appendix D, and summarized in *Section 3.4 Biological Resources* (page 3.4-19 to 3.4-21), concluded that with mitigation measures, the Proposed Project would have a less than significant impact on wetlands within the Project Area. Areas disturbed by construction activities would be restored to pre-construction conditions. While this is standard practice, *Section 3.10 Environmental Commitments* has been revised to reflect this standard (see *Section 3 Errata*, page 3-20 of this Final EIR).

Response to Comment 5-7

Areas disturbed by construction activities would be restored to pre-construction conditions. Should the irrigation controls identified by Caltrans be located in a roadway right-of-way or easement for CVWD's conveyance pipelines and therefore disturbed by the Proposed Project's construction, they would be repaired. While this is standard practice, *Section 3.10 Environmental Commitments* has been revised to reflect this standard (see *Section 3 Errata*, page 3-20 of this Final EIR).

Response to Comment 5-8

Injection wells would not be located adjacent to U.S. Highway 101 and Linden Avenue. The nearest potential injection well to the area indicated by the comment is Well Site #1, approximately 0.12 miles north of the intersection of Linden Avenue and U.S. Highway 101. Groundwater modeling was completed for the Proposed Project, with preliminary results presented in a Technical Memorandum dated March 2019 titled *Carpinteria Advanced Purification Project – Groundwater Model Simulation Results*. Scenario 2, "Put-and-Take", where groundwater recovery would occur

approximately in proportion to the volume of groundwater injected, aligns with the planned operation of the Proposed Project. Although groundwater levels immediately adjacent to the injection wells under this scenario are expected to rise approximately 10 feet compared to No Project conditions, modeling for this scenario found that water levels would remain at or below ground surface. It is not anticipated that groundwater levels in the area indicated by the comment would significantly increase as a result of the Proposed Project, due to operation of the project as “put-and-take”.

From: slkurasch@aol.com

Date: August 29, 2019 at 4:50:08 PM PDT

To: bob@cvwd.net

Cc: WadeNomura@ci.carpinteria.ca.us,

AlClark@ci.carpinteria.ca.us, johni@ci.carpinteria.ca.us, erinm@ci.carpinteria.ca.us

Subject: Draft EIR Comments, Carpinteria Advanced Purification Project

To: Carpinteria Valley Water District, Carpinteria Sanitary District

Re: Comments on the Draft EIR, Carpinteria Advanced Purification Project

There are a few characterizations of the CAPP that I feel are misleading. One is the statement that the entire process is widely used "throughout California". That may be true of Advanced Water Treatment (AWT), but very few projects besides Orange County's encompass aquifer or groundwater recharge using reclaimed wastewater as it still presents challenges. It is a very complex and expensive solution for a small municipality to treat recycled wastewater to the level of drinking water in order to inject it into the groundwater basin, as well as to continuously monitor the system to protect the water quality from pollutants, chemical purification by-products, pathogens, and salinity which degrade groundwater.

Comment
6-1

Conclusions of a 2004 study by Takashi Asano and others ("Groundwater recharge with reclaimed wastewater: Health and regulatory considerations", Semanticscholar.org), and the State of California's own criteria for groundwater recharge point to a cautionary approach as some uncertainties still exist with respect to public health risks. Indeed, the World Health Organization (who.int) in "Groundwater recharge with recycled municipal wastewater: Criteria for health related guidelines" recommends using aquifers artificially recharged with recycled wastewater "to serve several water needs – agricultural, urban and industrial uses that do not require potable water quality". In other words, separation of potable and non potable water is still accepted worldwide. This would have been more in line with some of the alternatives to full AWT discussed in 2016, and what many municipalities, such as San Francisco, now do.

Comment
6-2

Truly, the CAPP process can be most accurately characterized as "direct artificial aquifer recharge" because the retreated wastewater is injected into wells leading to the groundwater basin, as opposed to the process of "indirect aquifer recharge" that goes on naturally. The more euphemistic "indirect potable reuse" in the project description is more palatable to the public but does become confused with the accepted definition of indirect aquifer recharging as a natural process.

Comment
6-3

It is on this point that I object to this project EIR, of not considering other less costly alternatives that would address the tandem problems of water supply AND destructive flooding, which in turn can greatly affect water quality. This project does nothing toward

Comment
6-4

solving the latter and I believe that will be an ongoing management impact. With the passage of SGMA in 2014 requiring the stabilization of groundwater resources, more approaches are reflecting integrated "watershed" management that uses many solutions together to protect the public and the environment that we share.

Comment
6-4
continued

Comment
6-5

One of the standout approaches is stormwater capture, which can capture large quantities of water that otherwise goes into waterways and the ocean, often causing downstream pollution. The advantage of indirect recharge with stormwater is that the process of percolating water through the soil can filter many pathogens, organic compounds and environmental pollutants before entering the groundwater, without AWT. Captured stormwater is cost effective AND decreases flood dangers from runoff which is still a threat as recent storms have proven.

Comment
6-6

A joint 2014 study by the Natural Resources Defense Council and The Pacific Institute found that stormwater capture in the San Francisco Bay Area and urban areas of Southern California has the potential to increase water supplies by 420,000 to 620,000 acre feet, as much water as used by the entire city of Los Angeles in a year at a fraction of the cost of delivered water.(Stormwater Capture Potential in Urban and Suburban California)

<https://pacinst.org/wp-content/uploads/2014/06/ca-water-stormwater.pdf>

This could be achieved in park and open space retrofits, parking lot retrofits, "green streets" using permeable paving and absorbing swales in public R.O.W.s, infrastructure changes, gray water regulations for rooftop rain capture for non potable onsite use. In fact Los Angeles' mayor has already set the city's water imports to reduce in HALF by 2024 by implementing the pioneering stormwater capture plan to transform city streets and parks into water absorbing (and cleansing) machines, and has already won several sustainability awards. (Los Angeles, City of Water, NY Times 2014)

<https://www.nytimes.com/2014/12/07/opinion/sunday/los-angeles-city-of-water.html>

Research on groundwater recharging and water quality issues from the UC Water Security and Sustainability Research Initiative (ucwater.org) further concludes that in rural areas making more room for floodwaters can drastically improve groundwater supplies. The fact that groundwater in aquifers is vulnerable to contamination, and clean up technologies are so expensive is why protecting water quality is so important.

Comment
6-7

Carpinteria has taken so many commendable steps to steward the coastal environment, including the Salt Marsh Reserve and restoration. I am disappointed that more sustainable solutions to these pressing water problems that many communities are now embracing will not be considered.

Comment
6-8

Lisa J. Kurasch
29 August 2019
(408) 674-1112

cc: City Council, Public Works Director

Letter 6: Lisa Kurasch

Response to Comment 6-1

Potable reuse projects are increasingly common in California. The State Water Resources Control Board (SWRCB) Division of Drinking Water (DDW) has issued permits for ten agencies that are operating groundwater replenishment and reuse projects, eight of which use advanced treated water. These eight include the four seawater barrier projects in Orange and Los Angeles Counties:

Injection for Seawater Intrusion Control:

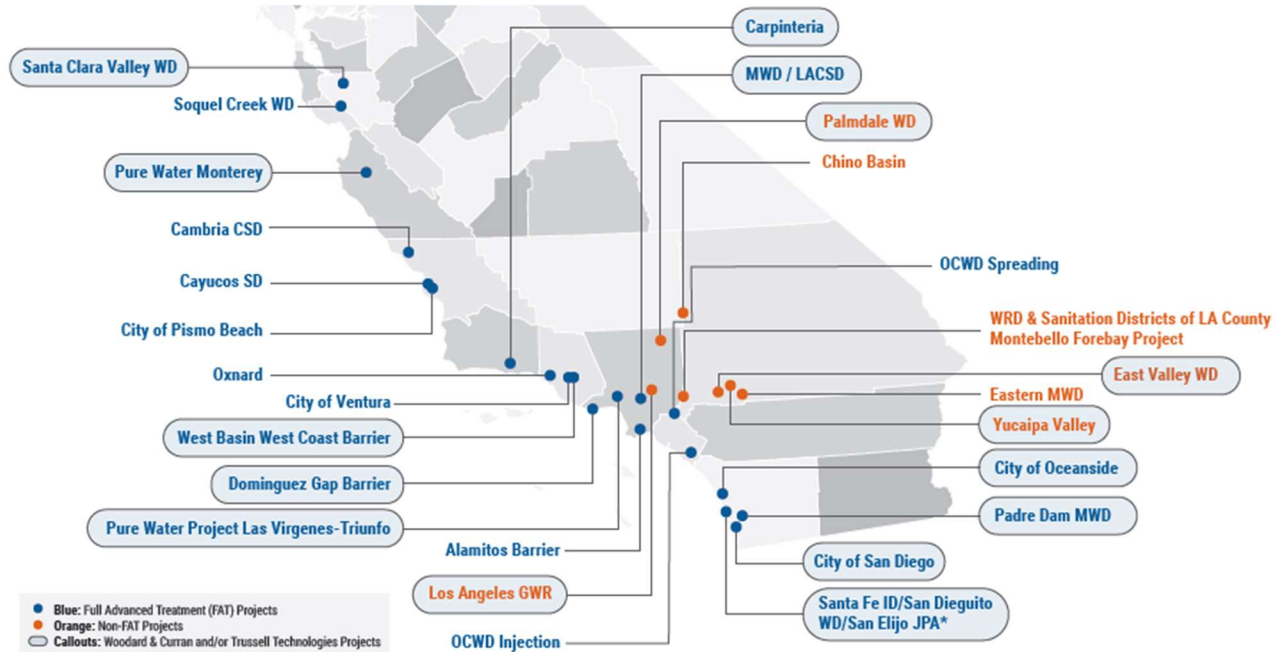
- West Coast Barrier, which is served recycled water from the West Basin Municipal Water District's Edward C. Little Water Recycling Facility;
- Dominguez Gap Barrier, which is served by the City of Los Angeles Terminal Island AWWP
- Alamitos Barrier, which is served by the Water Replenishment District of Southern California's Leo J. Vander Lans AWWP; and
- Talbert Barrier, which is served by the Orange County Water District's Groundwater Replenishment System AWWP.

Non-Seawater Barrier Groundwater Recharge Projects:

- Cambria Emergency Water Supply Project, which is served by Cambria Community Services District's Emergency Water Treatment Facility;
- Pure Water Monterey, which is served by Monterey One Water and Monterey Regional Water Pollution Control Agency's AWWP;
- Mid-Basin Injection and Anaheim Forebay served by the Orange County Water District's Groundwater Replenishment System AWWP; and
- Aquifer Storage and Recovery, which is served by City of Oxnard's AWWP.

Final EIR Figure 2-5 (see following page) shows permitted potable reuse projects (project name circled), and potable reuse projects currently under development. Title 22 of the California Code of Regulations, which regulates water quality for recycled water production and uses, includes stringent monitoring requirements to monitor for health and safety of end users and the groundwater basin. In order to receive approval from DDW to operate a groundwater recharge project, both the water system and recycled water system involved in the project must demonstrate that the system has technical, managerial, and financial (TMF) capacity to operate a complex project.

Figure 2-5: Potable Reuse Projects in California



Source: Adapted from WaterReuse California, July 18, 2018 “Potable Reuse Projects”, <https://watereuse.org/wp-content/uploads/2015/05/Map-7-18-18-2-1.pdf>

Response to Comment 6-2

The 2004 study cited in this comment (Asano et al., 2004) did conclude that the State of California’s draft guidelines point to a cautionary approach and uses it as an illustration of how to address public health uncertainties. The paper states that this cautious approach is appropriate to address concerns because it includes a combination of controls to maintain a microbiologically and chemically safe groundwater recharge operation (see Section 5 of the Asano paper). The paper also states that the emerging contaminants for groundwater recharge, including trace organics that may be endocrine disrupting compounds and pharmaceutically active compounds, were not detected in advanced treated water when either nanofiltration or reverse osmosis was used in the treatment process (see Section 4.2 of the Asano paper). As described in *Section 2.6.1* of the Draft EIR (page 2-7), the Proposed Project’s treatment train would include reverse osmosis as one of its treatment steps at the AWPF. Consistent with the conclusion of the Asano paper, compliance with the State of California’s guidelines for groundwater recharge with advanced treated water, and inclusion of reverse osmosis in the treatment process, would protect human health when the water is later extracted, treated, and added to the potable water system.

The World Health Organization paper cited in this comment (Brissaud, 2003) considers how to set water quality regulations for indirect and direct groundwater recharge with recycled wastewater in a manner that protects basin quality, public health, and avoids unnecessary costs. It recommends that the quality of water recharged into the basin match the quality required for the uses of water from the basin. That is, for aquifers whose water quality is too degraded to serve as a potable supply, recharge with recycled water is appropriate. It states that for recharge to aquifers that serve as an appropriate potable supply, recycled water should be treated to a level sufficient to avoid requiring additional treatment beyond what water extracted from the groundwater basin already receives to meet potable water quality standards. The paper states that recharge via injection wells for later potable use should be high quality (potable)

and at a minimum meet the standards of the country in which the project is operating (see page 13 of the Brissaud paper).

As stated in the 2016 Expert Panel Report *Evaluation of the Feasibility of Developing Uniform Water Recycling Criteria for Direct Potable Reuse*, commissioned by SWRCB, “In California, the practice of planned potable reuse has occurred in the form of indirect potable reuse (IPR) for over 50 years. Longstanding experience in California (and worldwide) has demonstrated that planned potable reuse using IPR can be practiced without having any apparent determinantal effects on public health.” The Expert Panel based this finding on several research reports completed since the 2004 Asano and 2003 Brissaud papers referenced in the comment, including the National Research Council’s 2012 *Water Reuse: Potential for Expanding the Nation’s Water Supply through Reuse of Municipal Wastewater*¹ and the U.S. Environmental Protection Agency’s 2012 *Guidelines for Water Reuse*² and publications by multiple experts in the field of water and wastewater treatment, monitoring, and risk assessment.

The Proposed Project would produce advanced treated water that meets or exceeds water quality requirements for advanced treated water for indirect potable reuse with a groundwater basin and would comply with all applicable permits. Advanced treated water is highly purified, and consistent with the State’s Title 22 regulations, is appropriate for indirect potable reuse using groundwater recharge.

Response to Comment 6-3

The California Code of Regulations Title 22, Division 4, Chapter 3, Article 5.2, which regulates indirect potable reuse through injection into the groundwater basin, refers to the groundwater recharge approach proposed by the CAPP as “Indirect Potable Reuse”.

Response to Comment 6-4

Alternatives to the Proposed Project are discussed in *Section 4 Alternatives* of the Draft EIR (see pages 4-1 through 4-42), and selected in accordance with CEQA Guidelines §15126.6. Alternatives should be able to attain most of the primary objectives of the Proposed Project. Project objectives for CVWD is limited to its jurisdiction, which is water supply. As such, flood control falls outside of CVWD’s jurisdiction and is not an objective of the Proposed Project or its alternatives.

Response to Comment 6-5

The Sustainable Groundwater Management Act (SGMA), passed in 2014, requires the State to sustainably manage its groundwater basins. This involves the creation of a Groundwater Sustainability Agency (GSA) for each high and medium priority groundwater basin (designated under the California Statewide Groundwater Elevation Monitoring [CASGEM] program), and for the GSA to develop and implement a Groundwater Sustainability Plan (GSP). The GSP should be designed to stabilize groundwater levels and promote sustainable management of groundwater. Under SGMA’s 2019 *Draft Basin Designation* (DWR 2019), the Carpinteria Groundwater Basin is a high priority basin, meaning it is an important potable supply to the community. As a result of this designation, CVWD is in the process of forming a GSA to develop the required GSP for the basin. Indirect potable reuse proposed by this Project would create

¹ Available online: <https://www.nap.edu/catalog/13303/water-reuse-potential-for-expanding-the-nations-water-supply-through>

² Available online: <https://nepis.epa.gov/Adobe/PDF/P100FS7K.pdf>

a new local supply while maintaining basin sustainability because the increased extraction of groundwater from the basin would be balanced by the injection of advanced treated water.

Response to Comment 6-6

This comment is not related to the environmental analysis under CEQA. Stormwater capture and control is not a project objective and is beyond CVWD's jurisdiction. The WWTP site includes onsite stormwater capture features, and stormwater captured on the site would be diverted for treatment at the WWTP (see *Section 2.6.1*, page 2-7 of the Draft EIR). The Proposed Project would also comply with the post-construction stormwater runoff requirements of the MS4 permit to implement stormwater capture at the injection well sites as appropriate (see *Section 3.11.4* of the Draft EIR, page 3.11-21).

Response to Comment 6-7

Water quality impacts from the Proposed Project are analyzed in *Section 3.11.4* of the Draft EIR (page 3.11-20 to 3.11-25), including groundwater quality (page 3.11-21). The Proposed Project would not recharge floodwaters or stormwaters. An Antidegradation Analysis would be completed as part of the permitting process with the State Water Resources Control Board's Division of Drinking Water and Central Coast Regional Water Quality Control Board (RWQCB). Further, Title 22 of the California Code of Regulations requires ongoing monitoring of groundwater quality when implementing indirect potable reuse with injection into a groundwater basin. Compliance with applicable permits would ensure the projects would not result in water quality impacts to groundwater supplies.

Response to Comment 6-8

The Proposed Project would advance treat recycled water for injection into the groundwater basin and later recovery for treatment and use as a potable supply. The Proposed Project would implement a more sustainable water supply because it is locally controlled and drought proof.



August 30, 2019

Robert McDonald
Carpinteria Valley Water District
1301 Santa Ynez Ave.
Carpinteria, CA 93013
(805) 684-2816 x112
bob@cvwd.net

**Subject: Comments on the Draft Environmental Impact Report for the
Carpinteria Advanced Purification Project (SCH# 2019011016), Santa
Barbara County**

Dear Robert McDonald:

The California Department of Fish and Wildlife (CDFW) has reviewed the above-referenced Draft Environmental Impact Report (DEIR) for the Carpinteria Advanced Purification Project (Project). The Carpinteria Valley Water District (CVWD) is the lead agency preparing a DEIR pursuant to the California Environmental Quality Act (CEQA; Pub. Resources Code, § 21000 et. seq.) with the purpose of informing decision-makers and the public regarding potential environmental effects related to the Project.

The Project is located primarily within the central portion of the City of Carpinteria (City), Santa Barbara County (County), with a small portion extending beyond the City limits into the unincorporated County. Conveyance pipelines would extend from the existing Carpinteria Sanitary District wastewater treatment plant (CSD WWTP; located at 5300 6th Street) west to Linden Avenue, then north along Linden Avenue for approximately one mile to just south of the Highway 192/Foothill Road intersection. The WWTP site is bounded by a railroad to the south, a live/work residential development to the west, the Carpinteria State Beach Park maintenance yard and employee housing to the north, and Carpinteria Creek to the east. South of the rail line is Carpinteria State Beach, which includes campgrounds and day use areas across the rail line from the site.

The Carpinteria Advanced Purification Project proposes to implement advanced treatment of local wastewater flows and beneficially reuse the water for groundwater recharge and includes the construction and operation an advanced water purification facility (AWPF), injection and monitoring wells, pump stations, storage tanks, pipelines and other facilities. The proposed Project would produce approximately 1,100 acre-feet per year (AFY) or 1.0 million gallons per day (MGD) of purified water from the CSD WWTP for injection into the local Carpinteria Groundwater Basin, where it ultimately would be used for CVWD potable water supply. To recover treated water from the groundwater basin, six potential groundwater injection well sites have been identified

(with up to three groundwater injection wells to be installed as part of this Project) and use of existing CVWD production wells. The ultimate project assumes an expansion from 1.0 MGD to 1.2 MGD based on projected future increases in WWTP flows. Construction is expected to take approximately 1.5 years for the 1.0 MGD initial project, with construction beginning in January 2021 and completed by late 2022.

The following comments and recommendations have been prepared pursuant to the CDFW's authority as a Responsible Agency (Pub. Resources Code, § 21069; CEQA Guidelines § 15381) over those aspects of the proposed project that come under the purview of the California Endangered Species Act (CESA; Fish and G. Code § 2050 *et seq.*), the Native Plant Protection Act (NPPA; Fish and G. Code, §1900 *et seq.*), lake and streambed alteration (LSA) regulatory authority (Fish and G. Code § 1600 *et seq.*); and other applicable sections of the Fish and Game Code (e.g., 3503, 3503.5, 3511, 4002, 4700, 5050, 5515, 5901, and 5937). Comments are also being provided as a Trustee Agency with jurisdiction over public trust natural resources that may be affected by the Project to assist the Lead Agency in avoiding or minimizing potential impacts to biological resources [Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a)].

Specific Comments

- 1) Northern California Legless Lizard: The DEIR indicates that the potential for Northern California legless lizard (*Anniella pulchra*), a California species of special concern (SSC), to occur on-site is low. However, legless lizard is known to occur within the general project area and the Project site appears to contain suitable habitat for this species. Moreover, based on information from other projects located to the southeast of the Project site, the type of habitat and coastal setting on-site have been shown to support legless lizards. Without information based on recent focused surveys, impacts to any SSC, including legless lizard, should be considered a significant direct and cumulative effect under CEQA without implementing appropriate avoid and/or mitigation measures (CEQA Guidelines §§ 15064, 15065, 15125[c] and 15380). CDFW recommends that the DEIR include a mitigation measure to conduct surveys for legless lizard before and during construction and develop/implement a plan to avoid and minimize impacts, which may include directing observed lizards to adjacent suitable habitat.
- 2) Lake and Streambed Alteration (LSA) Agreement Notification. The DEIR states that a LSA may be required for a portion of the Project located adjacent to and crossing Franklin Creek (Table 2-4, Table 4-1 and Section 2.7.2, Pipelines). The DEIR also identifies in Table 2-4 (Permits and Approvals) that NPDES for backflush discharge into Franklin Creek (if sewer discharge not used). CDFW recommends that the Project be conditioned to require LSA notification and written evidence that LSA authorization has been obtained, or that such authorization is not required, due to the proximity of the impact area to stream resources. As a Responsible Agency under CEQA, CDFW has authority over activities in streams and/or lakes that will divert or obstruct the natural flow; or change the bed, channel, or bank (including

Comment
7-1

Comment
7-2

vegetation associated with the stream or lake) of a river or stream; or use material from a streambed. For any such activities, the project applicant (or "entity") must provide written notification to CDFW pursuant to section 1600 et seq. of the Fish and Game Code. Based on this notification and other information, CDFW determines whether a LSA Agreement (Agreement) with the applicant is required prior to conducting the proposed activities. CDFW's issuance of an Agreement for a project that is subject to CEQA will require related environmental compliance actions by CDFW as a Responsible Agency. As a Responsible Agency, CDFW may consider the CEQA document prepared by the local jurisdiction (Lead Agency) for the Project. To minimize additional requirements by CDFW pursuant to section 1600 et seq. and/or under CEQA, the DEIR should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the LSA. ¹

Comment
7-2
continued

- a) As noted in Section 3.4.1 of the DEIR, Carpinteria Creek contains breeding populations of listed wildlife species including tidewater goby (*Eucyclogobius newberryi*) within brackish lagoon areas and Southern California steelhead trout (*Oncorhynchus mykiss irideus*) distinct population segment (DPS). Were project-related work could impact Franklin or Carpinteria Creeks, we recommend that measures to address potential impacts to these species, including fish passage, be included as a mitigation measure in the DEIR and included as part of the 1600 notification for the Project.

Comment
7-3

CDFW appreciates the opportunity to comment on the DEIR for the Carpinteria Advanced Purification Project. We also look forward to working with CVWD on ways to contribute purified water for in-stream flow purposes to benefit fish and wildlife resources. Questions regarding this letter and further coordination on these issues should be directed to Dan Blankenship, Senior Environmental Scientist, at (661) 259-3750) or Daniel.Blankenship@wildlife.ca.gov.

Sincerely,



Erinn Wilson
Environmental Program Manager I

cc: Randy Rodriguez, Los Alamitos
Dan Blankenship, Newhall
Sarah Rains, Thousand Oaks

Scott Morgan (State Clearinghouse)

¹ A notification package for a LSA may be obtained by accessing the CDFW's web site at www.wildlife.ca.gov/habcon/1600.

Letter 7: Erinn Wilson, California Department of Fish and Wildlife, South Coast Region

Response to Comment 7-1

The California legless lizard (*Anniella pulchra*) is a California species of special concern that has low potential to occur in the Project Area. This species requires habitats composed of sandy or loose loamy soils under sparse vegetation and soils with a high moisture content. Suitable habitat is present within the southern portion of the Proposed Project along Carpinteria State Beach, between the WWTP and the Pacific Ocean. At this location, the Proposed Project's ocean outfall pipeline traverses underneath the Carpinteria State Beach Campground and Carpinteria State Beach at a depth of 21 to 24 feet below mean sea level.

As indicated in *Section 3.4.4* on page 3.4-17 of the Draft EIR, no Proposed Project activities resulting in disturbance to this habitat are proposed. The remainder of the Project Area does not contain the habitat requirements for the species described above. As such, the northern California legless lizard is not expected to be impacted by the Proposed Project and focused surveys and a plan to minimize impacts are not warranted.

Per Mitigation Measure MM 3.4-2a, prior to Proposed Project mobilization, where the Project is adjacent to native habitat (i.e., environmentally sensitive habitat area, 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. Implementation of this mitigation measure would assure that potentially suitable habitat for special-status species within Carpinteria State Beach is avoided.

Response to Comment 7-2

As described in the Project Description of the Draft EIR (*Section 2.6.4*, page 2-11), five potential injection well sites are proposed, though only three sites would be selected for final Project design. If Well Site #6 were selected, potential impacts to Franklin Creek may occur in one of two ways: 1) open trench through the concrete channel, or 2) via pipe bridge. Additionally, backflush discharge into Franklin Creek was proposed if sewer discharge was not used. However, if Well Site #6 and backflush discharge into Franklin Creek are not selected, there would be no impacts to Franklin Creek. Therefore, a Lake and Streambed Alteration (LSA) Agreement and National Pollutant Discharge Elimination System (NPDES) permit would not be necessary as it pertains to these activities. If CVWD selects Well Site #6, or chooses to discharge backflush to the creek, and impacts to California Department of Fish and Wildlife (CDFW) jurisdictional waters could occur, CVWD would comply with Section 1600 *et seq.* of the Fish and Game Code. As a result of other Project activities (e.g., open-cut trenching for the Project pipeline alignment), the Project is expected to require a Storm Water Pollution Prevention Plan (SWPPP) and therefore would be subject to a NPDES permit. Table 2-4 in *Section 2.9* of the Draft EIR (page 2-25) includes a LSA Agreement. The Proposed Project would acquire all necessary permits, including those required by CDFW, and would be constructed in compliance with all applicable permit requirements.

Response to Comment 7-3

Carpinteria Creek is adjacent to and east of the Proposed Project and directly connects to the Pacific Ocean at Carpinteria State Beach. As noted in the response to Comment 7-1, Project activities are not proposed in Carpinteria State Beach where the ocean outfall pipeline traverses underground from the WWTP to the Pacific Ocean. As noted in the response to Comment 7-2, potential impacts to Franklin Creek would only occur if Well Site #6 and backflush discharge to the creek are selected. As described in *Section 3.11.4* of the Draft EIR (page 3.11-21), if trenchless

crossing of Franklin Creek is required (e.g, if Well Site #6 is selected), Mitigation Measure MM 3.11-1a would be implemented to prevent impacts from potential frac-out. Compliance with the Construction General Permit (Order 2009-0009-DWQ) would include preparation of a SWPPP that requires best management practices be implemented to avoid stormwater and runoff impacts to the creek. If Well Sites #1, #2, #3, or #4 are selected, Project-related work would not be anticipated to directly impact Franklin or Carpinteria Creek, and tidewater goby and southern California steelhead trout would not be expected to experience impacts as a result of the Proposed Project.

Implementation of Mitigation Measure MM 3.4-2a, Mitigation Measure MM 3.4-3b, and Mitigation Measure MM 3.4-3c would further minimize indirect impacts to waters and habitat for tidewater goby and southern California steelhead trout. Mitigation Measure 3.4-3b requires Project material to be stored on impervious surfaces or plastic ground covers to prevent any spills or leakage and staged at least 50-feet from potential jurisdictional waters. The measure also requires construction materials and spoils to 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. Mitigation Measure 3.4-3c lists several practices to be applied through the duration of the Project. For example, Project vehicles and equipment must be in good working condition and free of leaks; re-fueling, cleaning, and maintenance of equipment must be performed at least 50-feet from potentially jurisdictional waters, off-site tracking of loose construction and landscape materials must be prevented, and adequate spill prevention and response equipment on site must be maintained. With implementation of these mitigation measures, impacts to tidewater goby and southern California steelhead trout would be less than significant.

From: Nick Bobroff <nickb@ci.carpinteria.ca.us>
Date: August 30, 2019 at 5:07:02 PM PDT
To: "bob@cvwd.net" <bob@cvwd.net>
Cc: Steve Goggia <steveg@ci.carpinteria.ca.us>, Erin Maker <erinm@ci.carpinteria.ca.us>, John Ilasin <JohnI@ci.carpinteria.ca.us>, Rosalyn Prickett <rprickett@woodardcurran.com>
Subject: CVWD CAPP DEIR Comments

Good afternoon Bob,

The City has reviewed the District's July 2019 Draft EIR for the Carpinteria Advanced Purification Project.

We appreciate having the previous opportunity to review an administrative draft of the DEIR ahead of the official public release of the document, and note that most of the comments from our June 14, 2019 memorandum have been satisfactorily addressed.

With that in mind, we wish to share the following comments concerning the Draft EIR:

- Impact 3.1-1 and Mitigation Measure 3.1-1:

We understand that a large backwash tank will be required at a minimum of one of the injection well sites until the District determines the needed size for a final backwash tank. The temporary use of the large backwash tank may be for as long as five years after which time the District will replace the tank with the smallest backwash tank as possible and screen it with vegetation. While we support the proposed solution for the screening of the permanent facilities, we believe consideration should be given to siting of the temporary backwash tank to minimize its aesthetic and visual resource impacts on the community in light of the fact that it may be in use for up to five years. At a minimum, we believe an effort should be made to locate the temporary backwash tank in such a way that minimizes its visual prominence from nearby public viewpoints and private residences. We also suggest it be painted in such a way to blend into its surroundings, to the extent feasible. We would also support use of landscaping to screen the temporary tank.

- Mitigation Measure 3.14-1a: We

acknowledge that this Measure states that allowed construction hours will be as authorized under City permits. However, given the scope and size of the project, and the City's standard construction hour limitations for large discretionary permit projects, we believe it would be appropriate for this

Comment
8-1

Comment
8-2

Measure to list the allowable construction hours as Monday through Friday, 7:00 a.m. to 5:00 p.m. No construction shall be allowed on weekends or state holidays. As noted, after hours permits may be considered for extenuating circumstances (e.g., 24-hour continuous drilling for well sites) on a case-by-case basis, subject to CDD Director approval.

Comment
8-2
continued

- Mitigation Measure 3.18-1: Given the scope and extent of anticipated street right-of-way impacts associated with this project, the City strongly encourages the District to employ the assistance of a public information officer to lead and implement the public notification and awareness campaign for this project. From the City's experience with the U.S. Highway 101 and Carpinteria Avenue Bridge Replacement projects, a clear, timely and consistent effort to keep the public aware of ongoing project tasks and anticipated road closures/detours goes a long way toward minimizing/avoiding unnecessary transportation-related impacts.

Comment
8-3

Thank you again for the opportunity to review and comment on both the administrative and public drafts of the EIR for the District's CAPP project. Should you have any questions or wish to discuss our comments further, please feel free to contact me.

Sincerely,

Nick Bobroff, Senior Planner
Community Development Department
(805) 755- 4407

Note:

Carpinteria City Hall will be temporarily relocated to 4180 Via Real beginning Tuesday January 22, 2019. This temporary relocation is expected to end in December 2019. Please continue to use our mailing address of 5775 Carpinteria Avenue. All telephone numbers and email addresses will be the same.

Letter 8: Nick Bobroff, City of Carpinteria

Response to Comment 8-1

As noted in the Master Response – Noise and Vibration, only one backflush tank would be installed for the entire Proposed Project. The backflush tank would be located at Well Site #1, Well Site #4, or Well Site #6, as clarified in the revised Project Description (see *Section 3 Errata*, page 3-18 of this Final EIR). These sites were determined to be more appropriate sites for the backflush tank because it would have less visual impact than Well Site #3 at these sites. As described in Mitigation Measure MM 3.1-1, CVWD would install a temporary backflush tank during construction of the Proposed Project, to determine the required size for the permanent backflush tank (*Section 3.1.4*, page 3.1-8 of the Draft EIR). Mitigation Measure MM 3.1-1 has been modified to include screening measures for the temporary backwash tank (see *Section 3 Errata*, page 3-2 and page 3-20 of this Final EIR). The temporary tank, when screened, would look similar to the permanent tank shown in Figure 3.1-2 on page 3.1-9 of the Draft EIR (see *Section 3.1.4*).

Response to Comment 8-2

Mitigation Measure MM 3.14-1a has been modified to limit noise-generating construction hours to weekdays from 7:00 a.m. to 5:00 p.m., unless otherwise permitted by the City through an after-hours permit or as noted in the CUP (see *Section 3 Errata*, pages 3-8 through 3-9 and page 3-23 of this Final EIR).

Response to Comment 8-3

A point of contact who can serve as a public information officer is included in Mitigation Measure MM 3.14-1a. Mitigation Measure MM 3.14-1a has been modified to note that the public information officer may be a CVWD staff member, CSD staff member, or third-party public information officer as determined to be appropriate by CVWD and CSD (see *Section 3 Errata*, page 3-11 and page 3-25 of this Final EIR).



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August 30, 2019

Mr. Robert McDonald
 Carpinteria Valley Water District
 1301 Santa Ynez Ave.
 Carpinteria, CA 93013
 Via Email: bob@cvwd.net

Re: Draft Environmental Impact Report for Carpinteria Advanced Purification Project

Dear Mr. McDonald:

Santa Barbara Channelkeeper (SBCK) is pleased to provide comments on the Draft Environmental Impact Report (DEIR) for the Carpinteria Advanced Purification Project (CAPP). SBCK is a grassroots nonprofit organization dedicated to protecting and restoring the Santa Barbara Channel and its watersheds through science-based advocacy, education, field work and enforcement.

Overall, SBCK supports the proposed project and the move to develop recycled water as a new and drought-proof source of drinking water. SBCK believes that recycled water is preferable to other new sources of water supply being developed or utilized in our region – namely, seawater desalination - because it is less expensive, less energy intensive, less harmful to the marine environment, and actually benefits the environment by significantly reducing the volume of secondary treated wastewater into the ocean.

Comment
9-1

SBCK would, however, like to flag some general concerns about the proposed project.

For one, there is mounting concern about the presence of perfluoroalkyl and polyfluoroalkyl substances (PFAS) in drinking water, because PFAS can easily move through soil into groundwater aquifers and contaminate drinking water sources. Since PFAS are not known to break down in the environment, they have been “forever chemicals.” Although drinking water systems are not currently required to monitor for PFAS, we would urge the Carpinteria Valley Water District to do so voluntarily, and to notify its customers if they are detected so they can make educated decisions about if and how to use the water. We make this same comment for other chemicals of emerging concern (CECs).

Comment
9-2

In addition, there is concern that the increased concentration of salinity and nutrients that will be present in the remaining wastewater to be discharged to the ocean may cause or contribute to harmful algal blooms and ocean acidification hot spots, so we urge the District to develop and implement salinity and nutrient management plans.

Comment
9-3

Thank you for the opportunity to comment on the CAPP.

Sincerely,

Kira Redmond, Executive Director

Letter 9: Kira Redmond, Santa Barbara Channelkeeper

Response to Comment 9-1

Thank you for this comment. The purpose of the Proposed Project is to address a critical water supply reliability need in the region by advance treating recycled water and injecting it into the groundwater basin for later use.

Response to Comment 9-2

CVWD and CSD regularly monitor their systems for water quality. Title 22 of the California Code of Regulations, Division 4, Chapter 3, Article 5.2, §60320.200, requires indirect potable reuse projects that implement groundwater replenishment demonstrate compliance with existing regulations, while §60320.220 requires chemical and contaminant monitoring that includes priority toxic pollutants and chemicals as specified by the State Water Resources Control Board (SWRCB) Division of Drinking Water (DDW)¹. In 2018, DDW established notification levels for perfluorooctane sulfonic acid (PFOS) and perfluorooctanoic acid (PFOA) and therefore, all groundwater replenishment projects (including the CAPP) will be required to monitor at least quarterly for PFOS and PFOA. If the notification levels are not met prior to injection into the groundwater basin, a corrective action plan must be submitted by CVWD to the Regional Water Quality Control Board (RWQCB) and DDW. The SWRCB's 2019 *Recycled Water Policy* includes monitoring requirements for CECs, including PFOS and PFOA, and these requirements will be incorporated into the Waste Discharge Requirements permit that will be issued by the Central Coast RWQCB to CVWD and CSD for this project. Reverse osmosis removes greater than 99% of PFOS and PFOA (USEPA Drinking Water Treatability Database, accessed October 25, 2019²) and therefore, any PFOS or PFOA that is in the raw wastewater should be removed below the notification levels prior to injection into the aquifer.

Both Article 5.2 of Title 22 and the *Recycled Water Policy* require that CVWD and CSD develop monitoring surrogates, such as total organic carbon (TOC), to determine that the AWPf is successfully removing CECs at all times. Prior to beginning injection, CVWD and CSD are required by regulation to demonstrate that the AWPf is operating in an optimized manner to reduce CECs and are required to complete a 1-4-dioxane and/or n-nitrosodimethylamine (NDMA) removal study through the advanced oxidation process. While PFOS and PFOA are not removed by the advanced oxidation process, most CECs are removed by both reverse osmosis and advanced oxidation.

Response to Comment 9-3

Mass loading of salts and nutrient to the ocean will be the same under the Proposed Project as current conditions. A Dilution Study, Appendix J of the Draft EIR, and summarized in *Section 3.11.4* (page 3.11-23 of the Draft EIR), found the dilution ratio for the Proposed Project would be higher than existing conditions for brine discharged to the ocean, due to the 80% reduction in volume discharged by the Proposed Project and the reconfiguration of the diffuser ports. The marine biological resources analysis described in *Section 3.5.4* (pages 3.5-24 and 3.5-25 of the Draft EIR) found less than significant impacts to the marine environment as a result of changes to the discharge to the ocean from the Proposed Project and outfall modifications. Based on the results of the Dilution Study, the marine biological resources analysis found that the increase in dilution ratios would decrease mixing times and the extend of the zone of initial dilution, leading to more rapid mixing of the brine over a smaller area than existing conditions and no impacts to water quality, species assemblages, or habitat. An Antidegradation Analysis would be completed in support of the NPDES

¹ Notification Levels established by DDW can be found here:

https://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/NotificationLevels.html

² USEPA Drinking Water Treatability Database: <https://iaspub.epa.gov/tdb/pages/general/home.do#content>

Permit for Ocean Discharge that evaluates the potential for the Proposed Project to negatively impact ocean water quality. This Antidegradation Analysis would be considered in the permitting process for the Proposed Project. Receipt of the NPDES Permit from the Central Coast RWQCB to operate the Proposed Project in accordance with California Ocean Plan requirements would ensure that the project will not result in degradation of ocean water quality. With compliance of applicable permits and water quality regulations, the Proposed Project is not anticipated to violate any water quality standards.

2.3 Response to Comments Received During the Public Meeting on July 18, 2019

CVWD received a combination of comment cards and verbal comments at the July 18, 2019 Public Meeting on the CAPP. A total of 7 comment cards and 46 verbal comments were noted during the meeting. A summary of these comments is provided in **Table 2-3**, followed by written responses.

Table 2-3: Comments Received During Public Meeting

Comment #	Commenter	Comment
Comment Card		
1	Mona Khashoggi	Although I am not opposed to the project, I am opposed to the location I live at 1531 Nantucket Ct. in Seacoast Village. I work from home and I feel that it is insensitive to think that we will not be affected by the noise.
2	Mona Khashoggi	Providing temporary housing for me, my family, and 4 dogs is not an option and will greatly affect my livelihood, and possibly property value.
3	Mona Khashoggi	I am asking that you find an alternative spot than St. Joseph's or to go ahead with one of the alternate plans.
4	Michael Stephen	Noise: we have four dogs and two children and three adults
5	Michael Stephen	Structural damage: ground shaking for such a long period would have an effect on our home
6	Dick Weinberg	My concern is why we can't put wells in partial or non-congested property?
7	Pat Beatty	I was curious why drill would run 24 hours vs. 12 hours per day?
8	Father Martin	Wanted to know about O&M requirements during operations at well site, such as pump replacement, well rehabs, and routine monitoring/site visits by District staff.
9	Kim Jones	Does water injection mainly reach Carp water wells or can it be withdrawn by other users?
10	Phyllis Sfetku	Primary Water should be the alternative to use of recycled sewer water. Go to: PrimaryWaterInstitute.org . Additionally, primary water is drilled worldwide; including Ventura, CA and La Conchita, CA
Verbal Comment		
11	Paulette	I live in Carpinteria. Thank you for the presentation and putting info in the newspaper. I wanted to present the idea of an alternative to using recycled sewer water - primary water. Primary water is a clean source of water. I have information about primary water if you're interested. It's being done in Ventura and La Conchita. It's a clean source of water not recycled sewer water.
12	Gary Blair	I reside at Seacoast Village. I'm at ground zero at one of the proposed injection well sites. I can't determine if it's site #2 or #3. It's described as being the church field, but it's abutting my rear wall. It violates the setback requirements. Photos in EIR do not show the height or impact of it
13	Gary Blair	It would diminish the property values.
14	Gary Blair	Noise levels would be over 100 dba at night. Looking at drilling 24 hours/day, 7 days/week for up to 6 weeks.
15	Gary Blair	Long term impact is horrible. If someone tried to sell property while it's going on it's negative.
16	Gary Blair	Seacoast Village had to put up with El Carro well drilling. It's inadequate to say you'd put us up in hotels.
17	Gary Blair	Project is important, but it's more appropriate to locate it on Ag property across foothill where it doesn't impact residents.

Table 2-3: Comments Received During Public Meeting

Comment #	Commenter	Comment
18	Gary Blair	It will run for over 100 dB for hours at a time.
19	Gary Blair	Vibrate and shake. Linden residents had pipelines break because of Caltrans. It's enough. You're going to disrupt a major portion of Carpinteria in the manner you've presented. You've diminished the impacts of noise and vibration. Analysis is deficient
20	Gary Blair	I think you need to be more sensitive and CVWD should be a better neighbor. A lot of people will be affected if you site the injection well there.
21	Dick Weinberg	I feel like I've come in far down the line, and thought was coming to find out about drilling the water wells
22	Dick Weinberg	To follow up on earlier question - what is the reason the drilling and rest of construction has to be within the city limits of Carpinteria? It seems like there's a lot of open space in the aquifer. It seems like there are lots of places you can do it without interfering with the residents of the community.
23	Dick Weinberg	Assuming the project is covering the water district, which provides water for more than just the City of Carpinteria but also the Carpinteria Valley.
24	Dick Weinberg	It would have been easier for a lot of us if we had seen it [proposed well locations] some time ago
25	Ken Jones	I assume you are putting wells where you are so no one else takes out the water?
26	Dennis Kuttler	How many acre-feet does CVWD use per year?
27	Dennis Kuttler	1,000 AFY is 25% of current usage. I'm grateful. CVWD has finally done their primary job which is supply water. After so much conservation I'm grateful. I see this supply as not new, it's existing. It came from the sky, it was used by us, it was potable, it became unpotable, and now it'll become potable again. It's straightforward. We aren't widening the freeway, we aren't importing water. It's here. Presentation is informative. It's good stuff, it's not complicated
28	Dennis Kuttler	I don't see the necessity of spending money on an EIR. I see this as a planning process. The City of Carpinteria, if it doesn't have a sophisticated planning process, is pretty close. To think we needed an EIR to tell us about noise, vision, traffic – it's a no brainer. Question is why are we doing an EIR? Why can't we stop [the CEQA process] and put the application in based on engineering and proceed to getting it built?
29	Ken Barnes	Do you have discussion of the relevant pros and cons of the two alternatives you described (one of which was direct spreading of groundwater) vs the Proposed Project?
30	Rene Van Wingerden	Why are you not putting the water into the main line directly? Why not treat at CSD and then put it directly into the system?
31	Rene Van Wingerden	What happens once the groundwater basin is full again?
32	Rene Van Wingerden	Won't the state limit the discharges from CSD's WWP?

Table 2-3: Comments Received During Public Meeting

Comment #	Commenter	Comment
33	Rene Van Wingerden	Have concerns about accounting. CVWD is now entitled to a certain amount of acre-feet. From an agricultural standpoint, that doesn't sound good. Santa Maria is currently in lawsuits about this.
34	Gary Blair	When do we find out which 2 injection well sites are going to be chosen?
35	Gary Blair	That will happen at just one hearing?
36	Gary Blair	When will the recommendation be made?
37	Gary Blair	Will the Final EIR be released before it is certified?
38	Gary Blair	Will we be notified when the Final EIR is released?
39	Gary Blair	Construction is 9-10 weeks, and 3 weeks are 24-hour drilling?
40	Anonymous	Has anyone tested the current level of groundwater if you drilled?
41	Anonymous	Santa Barbara just tested groundwater depth and it was only 20 feet down at my property. You're at 100 feet?
42	Anonymous	How deep are the monitoring wells?
43	Gary Blair	How much money are you talking about?
44	Gary Blair	Rates are high now. That [the cost of this project] will show up on our bill one of these days, right?
45	Gary Blair	I need assurance from you that you've looked at the different options.
46	Anonymous	At what point in time will we be drinking treated sewer water?
47	Anonymous	With Sea Level Rise, why aren't we putting a desalination plant in?
48	Anonymous	You haven't looked at primary water?
49	Father Martin	How often does injection well need to be serviced?
50	Father Martin	What is the operating noise?
51	Anonymous	What kind of pressure will it [the injection well] be?
52	Anonymous	So no hydrofracturing?
53	Anonymous	Do you pay the landowners for the easement?
54	Anonymous	What does the easement agreement look like?
55	Anonymous	If you don't come to agreement with the landowner do you do a condemnation agreement?
56	Anonymous	When is the next meeting?

2.3.1 Comment Cards

Commenter: Mona Khashoggi

Response to Comment 1

Thank you for your support of the project. As noted in Master Response – Noise and Vibration, the location of the proposed injection well at Well Site #3 has been moved away from Seacoast Village residences. Noise modeling found that at distances greater than 100 feet from the injection well drilling, noise could be dampened enough to fall within applicable City noise limits for temporary construction activities. The revised location of the injection well within Well Site #3 would be 400 feet away from the nearest Seacoast Village residence.

Response to Comment 2

As noted in Master Response – Noise and Vibration, temporary housing is a common mitigation measure where noise impacts cannot be mitigated by other means. Construction noises are temporary and are not expected to affect property values in the long-term.

Response to Comment 3

CVWD has been coordinating with St. Joseph's Church to relocate the injection well further from residences and neighbors. Five potential sites are being considered by CVWD, as described in the Project Description of the Draft EIR (see *Section 2.2 Location*, on page 2-1, and Figure 2-1 on page 2-2 of the Draft EIR). Final site selection for the initial two wells (and ultimately a third well) will depend on costs and technical feasibility. Negotiations are underway and CVWD feels confident that the revised sites identified in this Final EIR will move forward.

Commenter: Michael Stephen

Response to Comment 4

Noise modeling found that at distances greater than 100 feet from the injection well drilling, noise could be dampened enough to fall within applicable City noise limits for temporary construction activities. Temporary relocation is a common mitigation measure where other sound dampening measures are inadequate to meeting noise thresholds (see Master Response – Noise and Vibration, above).

Response to Comment 5

Please refer to Master Response – Noise and Vibration, which addresses concerns about vibrations from the Proposed Project affecting structures.

Commenter: Dick Weinberg

Response to Comment 6

Well sites were selected based on the hydrogeology of the groundwater basin and CVWD's ability to extract water after it has been injected, along with availability of land and access. The Project Description has been revised to clarify well siting criteria (see *Section 3 Errata*, pages 3-16 through 3-17 of this Final EIR).

Commenter: Pat Beatty

Response to Comment 7

Well drilling requires nearly continuous drilling for safe well installation as described in Master Response – Noise and Vibration.

Commenter: Father Martin

Response to Comment 8

Operation and maintenance activities at the injection wells would primarily involve regular visits to the wells for testing and monitoring, as well as weekly backflushing of the injection wells by the submersible backflush pumps. Backflush pumps have an expected useful life of 5 to 10 years, with minimal maintenance required before then (see *Section 2.6 Proposed Project*, on page 2-6 of the Draft EIR). At the end of the backflush pumps' useful life, they would be replaced, which is a relatively simple process that would be done during daytime hours, and would not involve substantial noise or construction disturbances outside the immediate area around the well.

Commenter: Kim Jones

Response to Comment 9

It is not possible to only extract the physical water molecules injected by the Proposed Project – injected water would blend with other water in the aquifer. By injecting water into the basin, CVWD would increase the volume of water it would be allowed to extract from the basin, without affecting its existing groundwater rights or the water balance of the aquifer. While it is a question of water accounting on paper, other groundwater users may find their wells include water that was originally injected as part of the Proposed Project. The Proposed Project would not increase or otherwise change the volume of water that other groundwater users are allowed to pump. The hydrogeologic analysis completed of the Proposed Project, included as Appendix I of the Draft EIR, evaluated how far and in what direction water injected by the Proposed Project would travel in the groundwater basin. That analysis found under the proposed operation of the Proposed Project (referred to as “Scenario 2: Put-and-Take” in the hydrogeologic analysis), no existing wells would be impacted within 12 months, meaning that a given molecule of injected advanced treated water would take more than 12 months before that molecule would be extracted by one of CVWD's existing wells. Under the potential worst-case pumping scenario evaluated in the hydrogeologic analysis (“Scenario 3: Short-Term Maximum CVWD Pumping”), the injected water would travel 425 feet, maximum over a three-month period.

Commenter: Phyllis Sfetku

Response to Comment 10

CEQA requires that a “reasonable ranges of alternatives” be considered (CEQA Guidelines §15126.6). See *Section 4 Alternatives* of the Draft EIR (pages 4-1 to 4-42) for an evaluation of the project alternatives considered.

2.3.2 Verbal Comments

Commenter: Paulette

Response to Comment 11

“Primary water” was not considered as an alternative to the Proposed Project. This concept is not substantiated by the body of science that has investigated groundwater hydrology.

Commenter: Gary Blair

Response to Comment 12

Well Site #2 and Well Site #3 in the Draft EIR are adjacent to one another. The injection well at Well Site #3 was anticipated to be located near residences in the Draft EIR but has since been relocated within Well Site #3 further from residences, avoiding potential setback concerns from residents (see Master Response – Noise and Vibration). A visual simulation on page 3.1-9 of *Section 3.1 Aesthetics* in the Draft EIR showed the proposed injection well, fencing, screening, and emergency lighting. Final EIR Figure 2-2 (above) shows what the proposed new injection well at Well Site #3 is expected to look like.

Response to Comment 13

Construction of the injection well at Well Site #3 is expected to generate potential environmental impacts that require mitigation. Moving the location of the injection well within Well Site #3 would maintain such temporary construction impacts at less than significant with mitigation. Operation of the injection wells under the Proposed Project would not result in significant environmental impacts. The Draft EIR does not consider the Proposed Project’s potential effect on property value, which is not an environmental impact. The Proposed Project is consistent with existing land uses and land use regulations, as described in *Section 3.12.14* on pages 3.12-5 through 3.12-8 of the Draft EIR.

Response to Comment 14

Noise modeling for construction activities found that noise levels would be within the construction limits set by the City of Carpinteria for all properties greater than 100 feet from the injection well when mitigation is incorporated. 24-hour drilling is required for construction of the injection wells, and the 24-hour drilling phase of the wells’ construction would require 3 weeks, as described in *Section 2.7.3*, page 2-23 of the Draft EIR. Refer to Master Response – Noise and Vibration for a discussion on noise and relocation of the injection well within Well Site #3, which will reduce the number of residences within 100 feet of the injection well at that site.

Response to Comment 15

The Draft EIR does not consider the Proposed Project’s potential effect on property value, which is not an environmental impact. The Proposed Project is consistent with existing land uses and land use regulations, as described in *Section 3.12.14* on pages 3.12-5 through 3.12-8 of the Draft EIR.

Response to Comment 16

Noise modeling completed for the Draft EIR (see *Section 3.14-4*, page 3.14-11) found that sensitive receptors less than 100 feet from the drilling would experience noise levels above the construction noise threshold for the City of Carpinteria (75 dBA CNEL) and temporary housing was provided for these residents under Mitigation Measure MM 3.14-1a. As

noted in the Master Response – Noise and Vibration, relocation of the injection well within Well Site #3 would avoid residences within 100 feet of the injection well, and noise levels experienced by residents from construction of the injection well would be less than significant with mitigation as described in the Draft EIR and revised per the Errata of this Final EIR.

Response to Comment 17

Thank you for supporting the purpose of the Proposed Project to improve local supply reliability. Hydrogeologic analysis identified which areas of the groundwater basin were appropriate for injection with advanced treated water, while additional siting criteria were used based on distance to CVWD's existing wells, potential for acquiring property or easements, and regulatory requirements. Refer to Response to Comment 3-4 regarding siting criteria for the Proposed Project, and the revised Project Description (see *Section 3 Errata*, pages 3-16 through 3-17 of this Final EIR).

Response to Comment 18

See Response to Comment 44 and Master Response – Noise and Vibration.

Response to Comment 19

As described in Master Response – Noise and Vibration, vibration attenuates quickly through the ground, and vibration from the Proposed Project would not reach or exceed levels that would cause damage to structures with mitigation.

Response to Comment 20

Thank you for your comment. CVWD has been working with St. Joseph's Church to determine a suitable location for the injection well at Well Site #3 and has relocated the injection well within the site to reduce potential impacts to neighbors.

Commenter: Dick Weinberg

Response to Comment 21

See Response to Comment 2-4 for an overview of the notification and outreach process for the Proposed Project's CEQA process through close of comments on the Draft EIR. This included a Notice of Preparation, a Scoping Meeting (held January 24, 2019), and a public meeting on the Draft EIR (held July 18, 2019). Both meetings were advertised multiple times in the Coastal View News in accordance with the requirements of CEQA (CEQA Guidelines §15087). The public meeting in July 2019 was also advertised with posts on social media (Facebook and Nextdoor) and bill inserts to CVWD customers.

Response to Comment 22

Hydrogeologic analysis identified which areas of the groundwater basin were appropriate for injection with advanced treated water, while additional siting criteria were used based on distance to CVWD's existing wells, potential for acquiring property or easements, and regulatory requirements. Refer to Response to Comment 3-4 regarding siting criteria for the Proposed Project, and the revised Project Description (see *Section 3 Errata*, pages 3-16 through 3-17 of this Final EIR).

Response to Comment 23

The Proposed Project would provide water supply for CVWD, whose service area includes both the City of Carpinteria and portions of the Carpinteria Valley.

Response to Comment 24

See Response to Comment 2-4 for an overview of the notification and outreach process for the Proposed Project's CEQA process through close of comments on the Draft EIR. This included a Notice of Preparation, a Scoping Meeting (held January 24, 2019), and the public meeting on the Draft EIR (held July 18, 2019). Both meetings were advertised multiple times in the Coastal View News in accordance with the requirements of CEQA. The final well locations will be decided following certification of the Final EIR. The analysis in the Draft EIR included the full parcels that were identified as potential sites within which the injection wells would be located. The Draft EIR addressed the entire parcels for the five potential Well Sites.

Commenter: Ken Jones

Response to Comment 25

The potential Well Sites were selected based on hydrogeology of the groundwater basin and other siting criteria (see revised Project Description in *Section 3 Errata*, pages 3-16 through 3-17 of this Final EIR), including the location of CVWD's existing groundwater extraction wells in relation to the proposed injection wells.

Commenter: Dennis Kuttler

Response to Comment 26

Table 2-2 on page 2-6 of the Draft EIR shows CVWD's projected annual water demands range from 4,148 AFY to 4,205 AFY from 2020 through 2040. CVWD's *2015 Urban Water Management Plan* shows actual water demands in 2015 were 4,143 AF.

Response to Comment 27

Thank you for supporting the Proposed Project, which would increase CVWD's local, drought-proof supply by creating 1,100 AFY of advanced treated water for potable reuse.

Response to Comment 28

The EIR is required under CEQA to disclose potential adverse environmental impacts of a project, receive public input, and to reduce potential environmental impacts to the extent feasible. The Proposed Project meets the definition of a project under CEQA, as defined in CEQA Guidelines §15378, including an activity directly undertaken by a public agency, an activity undertaken by a person which is supported by assistances from a public agency, and as an activity involved a permit by a public agency. The Proposed Project does not meet any of the exemptions to CEQA under CEQA Guidelines §15061(b). As such, the CEQA process must be followed. An EIR was selected as the appropriate CEQA document because of the potential environmental impacts that would require mitigation to achieve less than significant levels.

Commenter: Ken Barnes

Response to Comment 29

Project alternatives are described in *Section 4.3 Project Alternatives* of the Draft EIR (page 4-2 through 4-6). In addition to describing the alternatives, their potential environmental impacts are evaluated in relation to those of the Proposed Project (see pages 4-8 through 4-39 of *Section 4.5* of the Draft EIR). Table 4-2 in *Section 4.5* of the Draft EIR (page 4-2) summarizes the degree of impact of the alternatives compared to the Proposed Project. Reasons for not selecting the alternatives are provided in *Section 4.6 Environmentally Preferred Alternative* (see page 4-39 of the Draft EIR). The No Project Alternative was determined to be the environmentally superior alternative, but would not meet the CVWD's project objectives. The Agricultural Irrigation Offset Alternative would have similar degrees of environmental impact as the Proposed Project, it was not selected because it did not meet all of CVWD's project objectives. The remaining alternative, the Surface Spreading Alternative, had a greater degree of environmental impact and was not selected. Other alternatives to the Proposed Project were considered but rejected during the initial planning stages. These included a combination of the Agricultural Irrigation Offset and Surface Spreading Alternatives, which was rejected for being financially infeasible, as well as two non-potable recycled water projects that were rejected for not fully meeting the goals of the Proposed Project - a municipal irrigation fill station and municipal irrigation-landscape irrigation (see *Section 4.7 Alternatives Considered but Rejected*, on page 4-40 of the Draft EIR).

Commenter: Rene Van Wingerden

Response to Comment 30

Adding advanced treated water directly into the main water line is referred to in drinking water regulations as "direct potable reuse", as compared to the Proposed Project which is referred to in the regulations as "indirect potable reuse". Indirect potable reuse requires advanced treated water be put into an environmental buffer, such as a reservoir or groundwater basin, where it would blend with other supplies in the buffer prior to extraction, treatment, and use. While regulations exist for indirect potable reuse, regulations are not yet in place for direct potable reuse. Direct potable reuse would therefore not be permitted by the State Water Resources Control Board.

Response to Comment 31

The Proposed Project would extract groundwater in an amount roughly equal to the volume of advanced treated water that it injects. If the groundwater basin does reach capacity, CVWD would be able to reduce the volume of water injected by the Proposed Project, or halt injections entirely. Discharge capacity at the WWTP would not be reduced as a result of the Proposed Project, and it would be possible to continue discharging treated wastewater consistent with current operations.

Response to Comment 32

CSD would continue to maintain the WWTP's existing permitted capacity for emergencies or if the AWPf goes offline or otherwise reduces the volume of advanced treated water it produces.

Response to Comment 33

The Proposed Project would extract an amount of water from the basin roughly equal to the volume injected from the Proposed Project. Water from the Proposed Project would not be counted as part of CVWD's existing groundwater rights, nor would implementation of the Proposed Project affect or change CVWD's overall groundwater rights.

Commenter: Gary Blair

Response to Comment 34

Following close of the public comment period for the Draft EIR and release of the Final EIR, a recommendation will be presented to CVWD's Board of Directors to certify the Final EIR, providing environmental clearance for all five potential injection well site parcels. Following certification of the Final EIR, the Proposed Project would continue to be refined by CVWD, CSD, and its design engineers and presented again to the CVWD Board of Directors before final design and request for construction bids. CVWD's Board of Directors will make the final Project approval decision.

Response to Comment 35

The CVWD Board of Directors may decide on the injection well sites in one meeting or may request multiple meetings before a decision is made.

Response to Comment 36

CVWD anticipates making a recommendation to certify the EIR for the Proposed Project at its Board meeting on December 11, 2019. CEQA requires that the Final EIR be considered prior to Project approval, but does not require that a final decision on the injection well sites be made at the time the EIR is certified. Negotiations for well sites are underway and CVWD feels confident that the revised sites identified in this Final EIR will move forward.

Response to Comment 37

Per CEQA Guidelines §15088(b), CVWD will provide written comments to public agencies that commented on the Draft EIR at least 10 days in advance of Board of Director's meeting to approve the Project and certify the Final EIR. Additionally, consistent with CEQA Guidelines §14089(b), CVWD will make the Final EIR, including this Response to Comments, available for public review on the CAPP website (<http://cvwd.net/capp/public-participation-meetings/#top>) at least 10 days before the Board of Directors meeting.

Response to Comment 38

CVWD will notify the public through its stakeholder email list when the Final EIR is released, and will include the date of the Board of Directors meeting (December 11, 2019) that will consider approval of the Project and certification of the EIR.

Response to Comment 39

Construction of each injection well is expected to take nine to 10 weeks, including site preparation, equipment set up, drilling, and completion of work at the site. Three of these weeks would include 24-hour drilling for the injection well.

Commenter: Anonymous

Response to Comment 40

Groundwater levels are monitoring monthly by CVWD. Current groundwater levels are approximately 100 feet below ground surface. Under normal conditions, groundwater levels are approximately 30 feet below ground surface. The recent drought, where increased groundwater pumping was required to meet demands due to limited supplies from the State Water Project and Cachuma Lake, caused substantial lowering of the groundwater basin.

Response to Comment 41

Yes, the drought lowered groundwater levels substantially and the Carpinteria Groundwater Basin has not fully recovered.

Response to Comment 42

Monitoring wells would be drilled to three different depths, one in each of the A, B, and C aquifers (see page 2-15 of the Draft EIR). Aquifer A occurs at a depth of approximately 280-340 feet below ground surface, Aquifer B occurs approximately 930-990 feet below ground surface, and Aquifer C occurs approximately 1,100-1,200 feet below ground surface. The Project Description has been revised to add a header for the monitoring wells subsection of the *Section 2.6 Proposed Project* in the Draft EIR and to clarify depth details for the monitoring wells (see *Section 3 Errata*, page 3-18 of this Final EIR).

Commenter: Gary Blair

Response to Comment 43

The Proposed Project is expected to cost approximately \$20-\$25 million at the time of the Draft EIR. Revised cost estimates estimate that the Proposed Project will cost approximately \$32 million (in 2022 dollars), which accounts for inflation and increases in labor and material costs associated with time.

Response to Comment 44

This comment is not related to the environmental analysis under CEQA.

Response to Comment 45

An alternatives analysis is included in *Section 4 Alternatives* (see page 4-1 through 4-42 of the Draft EIR). Alternatives to the Proposed Project were evaluated in CVWD's *2016 Recycled Water Facilities Plan*, and included non-potable recycled water for municipal irrigation, recycled water for agricultural irrigation, groundwater recharge, and a combination of agricultural irrigation and groundwater recharge. Four alternatives were developed, each of which included multiple options for a total of ten alternatives considered in the *Recycled Water Facilities Plan*. Alternatives were evaluated on cost, amount of water produced, feasibility and likelihood of success, and operational complexity.

Commenter: Anonymous

Response to Comment 46

Construction of the Proposed Project is expected to be completed in September 2022. Additional testing would be required prior to full operation and injection of advanced treated water into the groundwater basin. Once advanced treated water is injected, a minimum of six months of residence time is required before it could be extracted. Tracer studies (see hydrogeologic analysis in Appendix I of the Draft EIR) indicate it would likely be more than one year after injected water reaches extraction wells. The Proposed Project is anticipated to be fully operational in 2023, at which point CVWD could increase its groundwater pumping to align with its water rights plus the volume of advanced treated water injected into the basin.

Response to Comment 47

Seawater desalination is more expensive to build, operate, and maintain than recycled water. The City of Santa Barbara's Charles E. Meyer Desalination Plant produces approximately three times the volume of water than the proposed CAPP. Reactivation of the facility cost \$72 million, or approximately two-and-one-half to three times the projected cost of the Proposed Project (\$20-\$25 million to \$32 million). The City of Santa Barbara had an existing desalination plant that required reactivation and retrofitting, which likely resulted in cost savings compared to construction a new desalination plant as CVWD would need to do if seawater desalination were pursued. The City of Santa Barbara's desalination plant would also have benefitted from economies of scale not available to CVWD's proposed 1.2 mgd project.

Response to Comment 48

"Primary water" was not considered as an alternative to the Proposed Project. This concept is not substantiated by the body of science that has investigated groundwater hydrology.

Commenter: Father Martin

Response to Comment 49

The injection wells would require periodic maintenance visits from CVWD staff, anticipated to be weekly. *Section 2.8* of the Draft EIR Project Description has been revised to clarify maintenance trips to the injection wells (see *Section 3 Errata*, page 3-19 of this Final EIR). Additionally, backflush pumps would be replaced every 5-10 years depending on their performance and wear.

Response to Comment 50

Operating noise at the injection wells would be consistent with existing ambient noise levels, as described in Master Response – Noise and Vibration, above.

Commenter: Anonymous

Response to Comment 51

The advanced treated water would be injected into the groundwater basin at up to 30 psi. *Section 2.6.4* of the Draft EIR Project Description has been revised to clarify this detail (see *Section 3 Errata*, page 3-17 of this Final EIR).

Response to Comment 52

The Proposed Project would not involve hydrofracturing of the groundwater basin.

Response to Comment 53

Landowners would be compensated for any land purchases or easements secured for the Proposed Project's components.

Response to Comment 54

The land and easement acquisition process typically involves having an appraiser evaluate the property or easement, after which CVWD would negotiate a cost with the landowner.

Response to Comment 55

CVWD would not use a condemnation agreement if negotiation with landowners fail. The Draft EIR provides environmental analysis for five potential injection well sites, of which two would be selected for the initial project (1,000 AFY) and a third would be selected for the ultimate project (1,200 AFY). *Section 2.6.4*, page 2-11 of the Draft EIR, describes the five evaluated well sites and the number of injections wells that would be constructed under the Proposed Project. This approach provides flexibility in site selection.

Response to Comment 56

See Response to Comment 2-9 for information on the public involvement process for the Proposed Project's EIR. CEQA Guidelines §15088 requires written response to comments must be provided at least 10 days prior to certification to public agencies that submitted comments on the Draft EIR. CVWD will make the Final EIR, including this Response to Comments, available for public review on the CAPP website (<http://cvwd.net/capp/public-participation-meetings/#top>) at least 10 days before the Board of Directors meeting. CVWD's Board of Directors will consider the Final EIR at a public meeting to be held December 11, 2019.

3. ERRATA

This chapter presents revisions and clarifications to the Draft EIR. Text to be deleted from the Draft EIR is shown in ~~strikeout~~ and text that has been inserted into the Final EIR is shown in underline. Minor changes to the Draft EIR have been made herein to the following chapters: *Executive Summary*, *Section 2 Project Description*, *Section 3 Environmental Analysis*, *Section 4 Alternatives*, and *Section 6 References*. Although these chapters are not reprinted in this Final EIR, changes to clarify these chapters based on public comment are provided in errata format.

Executive Summary

Starting on page ES-2 of the Draft EIR, a minor revision has been made to Project Location to clarify the number of monitoring wells:

The CAPP is located in the City of Carpinteria and unincorporated Santa Barbara County, California. Carpinteria is located approximately 12 miles south of the City of Santa Barbara, and approximately 80 miles north of the City of Los Angeles. As shown in Figure ES 1, the Proposed Project is primarily located within the City of Carpinteria's municipal boundaries, with the exception of one potential injection well site (Well Site #6) and associated pipeline. The Proposed Project footprint covers an up-to-40-foot wide corridor that follows the conveyance pipeline, the WWTP site at 5351 6th Street, 10,000 square feet at each of up to three injection well sites, 5,000 square feet at each of up to six ~~three~~ monitoring well sites, and the immediate area around the existing ocean outfall. The injection well sites would be located approximately 0.8 to 1.0 miles north of the AWPf. Five potential injection well sites have been identified, though only three would be selected as design continues and property rights are acquired. Conveyance pipelines between the AWPf and the injection wells would generally run within the public roadway rights-of-way (ROWs). The pipeline would cross United States (U.S.) Highway 101 at the Linden Street Overpass.

A minor revision has been made to Proposed Project, on page ES-4 of the Draft EIR, to clarify the number of monitoring well sites:

When completed, the Proposed Project would produce approximately 1,100 AFY (1 million gallons per day (MGD)) of purified water from the Carpinteria Sanitary District (CSD) WWTP for injection into the local groundwater basin, where it ultimately would be used for CVWD potable water supply. Existing CVWD production wells would be used to recover treated water from the groundwater basin. The ultimate project assumes an expansion from 1.0 MGD to 1.2 MGD based on projected future increases in WWTP flows. The ultimate CAPP includes the following facilities:

- Advanced Water Purification Facility (AWPF) consisting of equalization tank, ~~microfiltration (MF)~~ ultrafiltration (UF), reverse osmosis (RO), and an advanced oxidation process (AOP), to be located on the WWTP site
- Purified Water Pump Station (PWPS), to be located on the WWTP site
- 6,100 linear feet (LF) of 12-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
- 2,000 LF of 8-inch conveyance pipeline from the well lateral split point to individual injection wells
- Up to three 14-inch injection wells with backwash pumps and one 42,000-gallon tank
- Either 1,400 LF of 12-inch well backwash discharge piping to existing sanitary sewers, or 600 LF of 12-inch to existing storm drain culverts
- Up to six ~~Six~~ monitoring wells
- Modifications to the CSD WWTP ocean outfall

Executive Summary

Starting on page ES-5 of the Draft EIR, several additions have been made to Table ES-1: CAPP Impact Summary. Revisions are provided in the following table:

Table ES-1. CAPP Impact Summary			
Impact Statement	Level of Significance After Mitigation ¹	Mitigation Measure	Relevant CAPP Components
Section 3.1, Aesthetics			
Impact 3.1-1: Potential to have a substantial adverse effect on a scenic vista?	LTS-M	MM 3.1-1 Minimize Tank Size and Install Screening. CVWD shall initially install a temporary backflush tank as part of the Proposed Project. This <u>temporary backflush tank</u> shall be used to determine the minimum size requirement for a permanent backflush tank necessary to serve the Proposed Project. <u>The temporary backflush tank shall be screened with fencing or vegetation.</u> Once a minimum tank size is determined (anticipated up to five years of CAPP operation), a permanent backflush tank would be constructed that reflects the determined minimum size. Once construction on the permanent tank is completed, CVWD shall install vegetation screening to reduce the visual impact of the backflush tank. Landscaping shall be selected as determined appropriate and feasible for its compatibility with the surroundings and subject to review and approval by the City of Carpinteria's Architectural Review Board. Large container-size plantings and/or fast-growing vegetation shall be used for screening around the backflush tanks. Lighting shall be low intensity and located and designed to minimize direct view of light sources and diffusers, and to minimize halo and spillover effects. After construction is complete, CVWD shall restore all landscaped areas affected by construction, access, and equipment staging.	Mitigation Measure MM 3.1-1 shall apply to the injection wells and backflush tank.
Section 3.4, Biological Resources			
Impact 3.4-1: Have a substantial adverse effect, either directly or through habitat modifications, on	LTS-M	In addition to the Mitigation Measures identified here, Mitigation Measure MM 3.1-4 , under 3.1 <i>Aesthetics</i> , above, shall apply to the Proposed Project to mitigate for potential light-related impacts to sensitive species. 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	Mitigation Measures MM 3.4-1a , <u>shall apply to all construction activities.</u> Mitigation Measures MM 3.4-1b , and

Table ES-1. CAPP Impact Summary

Impact Statement	Level of Significance After Mitigation ¹	Mitigation Measure	Relevant CAPP Components
<p>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 Wildlife or U.S. Fish and Wildlife Service (USFWS)?</p>		<p>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.</p> <p>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. <u>Training for workers who will be involved with the ocean outfall improvements will also include vessel-based monitoring training for identification of marine mammals.</u> 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.</p> <p>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.</p> <p>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</p>	<p>MM 3.4-1c shall apply to all construction activities occurring on land.</p> <p>Mitigation Measure MM 3.1-4 shall apply to any nighttime construction within 500 feet of habitat areas.</p>

Table ES-1. CAPP Impact Summary

Impact Statement	Level of Significance After Mitigation ¹	Mitigation Measure	Relevant CAPP Components
		<p>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</p> <p>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:</p> <ol style="list-style-type: none"> 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. <p>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.</p> <p>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</p>	

Table ES-1. CAPP Impact Summary			
Impact Statement	Level of Significance After Mitigation ¹	Mitigation Measure	Relevant CAPP Components
		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.	
Impact 3.4-5: Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	LTS-M	<p>Mitigation Measures MM 3.4-1a, MM 3.4-1b, MM 3.4-1c, MM 3.4-2, MM 3.4-3a, MM 3.4-3b, and MM 3.4-3c, MM 3.4-3d, above, shall apply.</p> <p>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:</p> <ol style="list-style-type: none"> No ground disturbance, grading, trenching, construction activities or structural development shall occur within the tree protection zone (TPZ; dripline plus 6 feet). 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. If work within the TPZ cannot be avoided, a qualified arborist shall monitor all activities within the TPZ of protected trees. 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. 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. 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. 	<p>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 shall apply to all terrestrial components of the Proposed Project.</p>

Table ES-1. CAPP Impact Summary			
Impact Statement	Level of Significance After Mitigation ¹	Mitigation Measure	Relevant CAPP Components
		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.	
Section 3.5, Marine Biological Resources			
<p>Impact 3.5-1: 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 Wildlife or USFWS?</p>	LTS-M	<p>Mitigation Measure MM 3.1-4, under 3.1 <i>Aesthetics</i>, and Mitigation Measures MM 3.4-1a and MM 3.4-1b, under 3.4 <i>Biological Resources</i>, shall apply.</p> <p>Mitigation Measure MM 3.5-1a Avoidance Measures for Marine Mammal and Sea Turtle Species. To minimize disturbance to species status marine mammal and sea turtle species, general guidelines set forth in the Marine Mammal Protection Act shall be implemented. Vessels under power shall remain at least 100 yards (300 feet) away from whales and 50 yards (150 feet) from dolphins, porpoises, seals, sea lions and sea turtles. When encountering marine mammals, the vessel shall slow down, operate at no-wake speed and the vessel shall be put in neutral to let the individual pass.</p> <p>Mitigation Measure MM 3.5-1b Subtidal Biological Survey. To minimize direct project impacts to special status abalone species and offshore ESHA including rocky points, intertidal areas, subtidal reefs and kelp beds, at least 45 days prior to the start of in-water project activities, a subtidal biological survey shall be completed by a qualified biologist to document areas of kelp, special status species, and rocky reef within the Marine APE and a 100-foot buffer. <u>Results of this survey, specifically of the kelp survey, shall be provided to the California Coastal Commission if requested.</u> If the survey identifies rocky reefs, kelp bed, or special status species, project activities shall avoid and anchor project-related vessels at least 50 feet away from special status species and habitat, if feasible. If the area cannot be avoided, the project shall utilize techniques that minimize turbidity (i.e. installation of a turbidity curtain), scarring on rocky habitat, and down cast sand excavated at or near the outfall into sand channels away from rocky habitat. For consistency with Policy OSC-4 of the City's General Plan/Local <i>Coastal Land Use Plan</i>, a post construction survey shall be completed by a qualified biologist to document final conditions.</p>	<p>Mitigation Measures MM 3.1-4, MM 3.4-1a, MM 3.4-1b, MM 3.5-1a and MM 3.5-1b shall apply to the Proposed Project activities associated with the ocean outfall improvements.</p>

Table ES-1. CAPP Impact Summary			
Impact Statement	Level of Significance After Mitigation¹	Mitigation Measure	Relevant CAPP Components
Impact 3.5-4 3.5-5: Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	LTS-M	Mitigation Measures MM 3.4-1a, MM 3.5-1a, and MM 3.5-1b above, shall apply.	Mitigation Measure MM 3.4-1a, MM 3.5-1a, and MM 3.5-1b shall apply to the Proposed Project activities associated with the ocean outfall improvements
Section 3.11, Hydrology and Water Quality			
Impact 3.11-1: Potential to violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	LTS-M	Mitigation Measures MM 3.4-3a, MM 3.4-3b, and MM 3.4-3c , in 3.4 <i>Biological Resources</i> , above, shall apply to all construction within 50 feet for Franklin Creek and Carpinteria Creek. Mitigation Measure MM 3.10-1a MM 3.11-1 shall apply to any trenchless crossings. MM 3.11-1 Frac-Out Prevention and Contingency Plan. Prior to constructing a trenchless crossing of Franklin Creek, a <i>Frac-Out Prevention and Contingency Plan</i> shall be developed. At minimum the plan shall prescribe the following measures to ensure protection of aquatic resources, special status plans and wildlife: <ul style="list-style-type: none"> • Procedures to minimize the potential for a frac-out associated with horizontal directional drilling; • Procedures for timely detection of frac-outs; • Procedures for timely response and remediation in the event a frac-out; and Monitoring of drilling and frac-out response activities by a qualified biologist	Mitigation Measures MM 3.4-3a, MM 3.4-3b, and MM 3.4-3c shall apply to all construction within 50 feet for Franklin Creek and Carpinteria Creek. Mitigation Measure MM 3.11-1 shall apply to all trenchless crossings.
Section 3.12, Land Use and Planning			
Impact 3.12-2. Potential to cause a significant environmental	LTS-M	Mitigation Measures MM 3.14-1a, MM 3.14-1b, and MM 3.14-1c , in Section 3.14, <i>Noise</i> below, and Mitigation Measure MM 3.18-1 in Section 3.18, <i>Transportation</i> , below, shall apply.	Mitigation Measures MM 3.14-1a, MM 3.14-1b, MM 3.14-1c, and MM 3.18-1 shall apply

Table ES-1. CAPP Impact Summary			
Impact Statement	Level of Significance After Mitigation ¹	Mitigation Measure	Relevant CAPP Components
impact due to a conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Project (including, but not limited to the general plan, specific plan, local coastal program [LCP], or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?			to construction of injection and monitoring wells that generate noise, vibration, or transportation impacts that substantially interfere with existing residential uses.
Section 3.14, Noise			
Impact 3.14.1: Temporary or permanent increase in ambient noise levels in excess of applicable	LTS-M	<p>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:</p> <ul style="list-style-type: none"> • Limit Construction Hours: Construction hours shall be limited to times authorized under the City and County Municipal Codes and as allowed by applicable permits. <u>Within For</u> the City of Carpinteria, <u>noise-generating construction will be is</u> limited to the hours of 7:00 a.m. to 8:00 p.m. 	<p>Mitigation Measure MM 3.14-1a shall apply to all Proposed Project construction activities.</p> <p>Mitigation Measures</p>

Table ES-1. CAPP Impact Summary

Impact Statement	Level of Significance After Mitigation ¹	Mitigation Measure	Relevant CAPP Components
standards?		<p><u>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.</u></p> <ul style="list-style-type: none"> • 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: <u>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.</u> • 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 	<p>MM 3.4-1a, MM 3.5-1a and MM 3.5-1b shall apply to the Proposed Project activities associated with the ocean outfall improvements.</p>

Table ES-1. CAPP Impact Summary

Impact Statement	Level of Significance After Mitigation ¹	Mitigation Measure	Relevant CAPP Components
		<p>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.</p> <ul style="list-style-type: none"> • 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 	

Table ES-1. CAPP Impact Summary

Impact Statement	Level of Significance After Mitigation ¹	Mitigation Measure	Relevant CAPP Components
		<p>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.</p> <ul style="list-style-type: none"> • Pre-Construction Notification: At least two weeks <u>one week</u> 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. <u>As required by the California Coastal Commission, noticing to mariners will be provided in advance of work on the ocean outfall.</u> • 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 <u>or a third-party public information officer</u> 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. 	

Table ES-1. CAPP Impact Summary			
Impact Statement	Level of Significance After Mitigation ¹	Mitigation Measure	Relevant CAPP Components
Section 3.18, Transportation			
<p>Impact 3.18-1: Potential to conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?</p>	LTS-M	<p>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:</p> <ul style="list-style-type: none"> • 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 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. 	<p>Mitigation Measure MM 3.18-1 shall apply to construction activities requiring lane or road closures or detours that would impact any mode of transportation including mass transit, roadway, bicycle and pedestrian facilities.</p>

Table ES-1. CAPP Impact Summary

Impact Statement	Level of Significance After Mitigation ¹	Mitigation Measure	Relevant CAPP Components
		<ul style="list-style-type: none"> • Coordination with Caltrans: <u>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.</u> • 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. 	

Table ES-1. CAPP Impact Summary			
Impact Statement	Level of Significance After Mitigation ¹	Mitigation Measure	Relevant CAPP Components
		<p>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.</p> <ul style="list-style-type: none"> • 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. 	
Section 3.21, Wildfire			
Impact 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?	LTS-M	Mitigation Measure MM 3.10-6 MM 3.10-7 , in Section 3.10, <i>Hazards and Hazardous Materials</i> , above, shall apply.	Mitigation Measure MM 3.10-7 shall apply to construction of all Proposed Project components.
Impact 3.21-3: Require the installation or maintenance of associated infrastructure (such	LTS-M	Mitigation Measure MM 3.10-6 MM 3.10-7 , in Section 3.10, <i>Hazards and Hazardous Materials</i> , above, shall apply	Mitigation Measure MM 3.10-7 shall apply to construction of all Proposed Project components.

Table ES-1. CAPP Impact Summary			
Impact Statement	Level of Significance After Mitigation¹	Mitigation Measure	Relevant CAPP Components
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?			

Section 1 Introduction

A minor revision to the bullet list in Section 1.1 Project Overview, on page 1-1 of the Draft EIR, has been made to clarify the number of monitoring well sites:

In 2016, CVWD, along with Carpinteria Sanitary District (CSD) and City of Carpinteria (City), completed a *Recycled Water Facilities Plan* (CVWD 2015) that was partially funded by the State Water Resources Control Board (SWRCB). This plan recommended alternatives for a recycled water project with groundwater recharge. The recommended project consists of producing approximately 1,100 AFY (1 million gallons per day (MGD)) of purified water from the CSD Wastewater Treatment Plant (WWTP) for injection into the local groundwater basin, where it ultimately would be used for CVWD potable water supply. Existing CVWD production wells would be used to recover treated water from the groundwater basin. The ultimate project assumes an expansion from 1.0 MGD to 1.2 MGD based on projected future increases in WWTP flows. The ultimate CAPP includes the following facilities:

- AWPf consisting of equalization tank, ~~microfiltration (MF)~~ ultrafiltration (UF), reverse osmosis (RO), and an AOP, to be located on the WWTP site
- Purified Water Pump Station (PWPS), to be located on the WWTP site
- 6,100 linear feet (LF) of 12-inch conveyance pipeline from the PWPS to a well lateral split point, including Caltrans installation for the Linden Avenue overpass over United States (U.S.) Highway 101
- 2,000 LF of 8-inch conveyance pipeline from the well lateral split point to individual injection wells
- Up to three 14-inch injection wells with backwash pumps and one 42,000-gallon tank
- Either 1,400 LF of 12-inch well backwash discharge piping to existing sanitary sewers, or 600 LF of 12-inch to existing storm drain culverts
- Up to six ~~Six~~ monitoring wells
- Modifications to the CSD WWTP ocean outfall

Section 2 Project Description

A new Section 2.6 Injection Well Siting Criteria, inserted at page 2-6 of the Draft EIR, has been added to the Project Description to explain how the proposed injection well sites were identified:

2.6 Injection Well Siting Criteria

Proposed Well Sites were identified using injection well siting criteria developed by CVWD and its consultant team, as described in a 2017 Technical Memorandum (CVWD, 2017). A multi-step evaluation was used to select proposed injection well sites. Injection wells should:

1. overlie the confined area of the Carpinteria Groundwater Basin to provide control over where the advanced treated water flows within the basin,
2. be located within the general area of the basin that serves as CVWD's supply, and
3. must be able to meet SWRCB DDW regulations for groundwater replenishment using direct injection of recycled water, which requires a minimum two-month residence time for water that meets all Pathogenic Microorganism Control requirements.

Based on the regulatory requirements and hydrogeologic parameters for the basin, CVWD determined injection wells must be a minimum of 600 feet from existing extraction wells. Additionally, it was determined that 10,000 square feet of intact, contiguous open space that could accommodate well drilling and construction would be required for each proposed Well Site. Following identification of potential well sites that met these preliminary criteria, detailed siting criteria were applied within four categories:

- **Regulatory:** Must have room for a 50-foot radius wellhead protection zone, avoid possibly contaminating activities (none within 1000 feet), and must meet DWR well setback requirements:
 - Sewer line or septic tank – 50 feet
 - Leachfield – 100 feet
 - Animal or fowl enclosure – 150 feet
- **Hydrogeologic:** Must overlie the confined area of the basin and avoid potential well interference effects. A minimum separation of 1,000 feet between each injection well.
- **Construction Logistics:** Must have sufficient work space (10,000 square feet of contiguous, open area), have available access for large construction equipment, have relatively level and firm ground surface, be accessible during wet weather, have access to steady water supply sufficient for drilling activities, have access to appropriate water disposal facilities, and have room to implement noise abatement measures such as sound walls.
- **Permanent Facility Considerations:** Locate well within the site in a location that would be relatively inconspicuous and not conflict with existing uses or surroundings, sufficient access exists for ongoing maintenance work and equipment, sufficient room for a backflush tank, and consideration of room for a potential replacement well in the long-term future when the original injection wells reach the end of their useful life.

2.6.4 Injection Wells

Section 2.6.4 Injection Wells (now Section 2.7.4 Injection Wells), on pages 2-11 to 2-12 of the Draft EIR, has been revised to clarify lighting and backflush tank siting, as well as pressure of injected water.

As shown on Figure 2-1, above, injection wells are proposed at five potential sites located north of U.S. Highway 101 (Well Sites #1, #2, #3, #4, and #6). A sixth well site (Well Site #5) was originally considered for the Proposed Project at Franklin Creek, but has been excluded from the Proposed Project. It is considered in the Project Alternatives (Section 4). Numbering conventions for the proposed well sites have been retained. In total, three injection wells are planned for construction. Two will be constructed in the first phase of the Proposed Project for the 1.0 MGD AWPF, with one well on either side of Linden Avenue to provide sufficient separation to avoid injection operations interference in the groundwater basin. A third injection well would be constructed when the AWPF is expanded to its ultimate capacity of 1.2 MGD. Advanced treated water would be injected into the groundwater basin at up to 30 psi pressure. The injection wells are anticipated to be constructed utilizing above-grade with the well head facilities placed in screened cages or behind fences. If Well Site #3 is selected, the injection well would be constructed in a below-ground vault to minimize interference with existing uses of the field at St. Joseph's Church. Injection wells would be single-completion wells having one borehole with casing and screening in the A, B, and C aquifers. The wellheads would include injection supply lines, flow meters, air release valves, pressure-regulating valves, and controls for down-hole flow control valves. An electric/pneumatic control panel would be installed next to the wellhead and piping. Lighting

would be installed in the event that a problem with the wells that must be addressed at night, such as an emergency, but would generally remain off.

Periodic backflush of each well would be required to keep the well operating at peak performance, and is part of normal maintenance. A dedicated backflushing pump at each well site would be used for regular cleaning of the well screens. To minimize visual impacts from the injection wells, CVWD would install submersible backflush pumps at the wells. To further reduce visual impacts in residential neighborhoods, a single 42,000-gallon tank, required for temporary storage of backflush water, would be installed to serve all three wells rather than installing a tank at each injection well site. A single well, including backflush water holding tank, is anticipated to have a footprint of 6,000 square feet (60 feet by 100 feet). The backflush tank would not be installed at Well Site #3 due to its location adjacent to a field actively used by St. Joseph's Church. During construction, the impacted area would be approximately 10,000 square feet to accommodate a drill rig, laydown, support equipment, and groundwater treatment tanks. The locations of the selected well, backflush water holding tank, and associated equipment have not been selected at the available sites; therefore, the actual impacted area would be smaller than the areas shown in Proposed Project figures. Figure 2-5 shows an example well site and Figure 2-6 is an example well site with a co-located backflush tank.

2.6.4 Well Backflush Discharge Pipelines

Section 2.6.5 (now Section 2.7.5) has been modified to include a header for the monitoring wells description on page 2-15 of the Draft EIR, to provide clarity for readers, while text has been modified to include details on monitoring well depths. The header has been added immediately following Figure 2-7 Potential Backflush Discharge Locations:

2.6.6 Monitoring Wells

Figure 2-8 shows an example monitoring well surface completion. Up to six ~~Four~~ monitoring well locations are proposed between the injection wells and the CVWD potable water wells at the approximate locations shown in Figure 2-9. The locations selected for monitoring wells would be dependent on the injection well locations selected. Regulations require monitoring wells downgradient of the injection well within two weeks to six months after time after injection and another well at least 30 days upgradient from the potable well.

The monitoring wells would include either three nested polyvinyl chloride (PVC) casings completed in the A, B, and C aquifers or three individual monitoring wells on each site. The well completion for Aquifer A would range in depth from 280 feet to 340 feet below ground surface, the completion for Aquifer B would range in depth from 930 feet to 990 feet below ground surface, and the completion for Aquifer C would range in depth from 1,100 feet to 1,200 feet below ground surface. For the nested monitoring well, three, 3-inch diameter casings in each monitoring well would be nested in a 24-inch borehole and equipped with a sampling pump. For individual monitoring wells, 3-inch casings would be installed for each aquifer at different depths. During construction, the impacted area would be approximately 5,000 square feet to accommodate the drill rig, laydown, support equipment, and groundwater treatment tanks. Once installed, above-ground facilities would include a small circular vault lid (up to 3 feet in diameter) enclosing a below-ground vault containing the nested well or three monitoring wells at different depths. During periodic sampling, temporary piping or hosing to a gutter or storm drain inlet would be required for discharge.

2.8 Proposed Operations and Maintenance

Section 2.8 Proposed Operations and Maintenance, on page 2-24 of the Draft EIR, has been revised to clarify maintenance activities at the injection well sites:

The following describes briefly the operations and maintenance (O&M) for each of the Proposed Project's proposed key facilities:

- AWPf:
 - Daily inspections and maintenance of MF/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.
- 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 700 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 quarterly monitoring

2.10 Environmental Commitments

Section 2.10 Environmental Commitments, on page 2-27 of the Draft EIR, has been revised to clarify CVWD shall restore construction areas to pre-construction conditions and coordinate with Caltrans as appropriate to secure an encroachment permit and comply with Caltrans requirements, as well as to clarify timing of construction along Linden Avenue:

In addition to compliance with applicable permits, laws, and regulations, CVWD shall include the following environmental commitments in its plans and specifications and in its construction contracts. These environmental commitments are part of the Proposed 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 who will be present for ocean-based

work shall be trained to serve as vessel-based monitors for marine mammals, unless another, appropriately trained monitor will be present. Divers shall also be trained to identify *Caulerpa taxifolia* and to avoid it during outfall modification. 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 2-4, 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 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 conditionals of approval and requirements of the encroachment permit as determined by Caltrans' 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.

3.1.4 Impact Statements and Mitigation Discussions

Mitigation Measure 3.1-1, on page 3.1-8 of the Draft EIR has been revised to include screening of the temporary backflush tanks:

MM 3.1-1 Minimize Tank Size and Install Screening. CVWD shall initially install a temporary backflush tank as part of the Proposed Project. This temporary backflush tank shall be used to determine the minimum size requirement for a permanent backflush tank necessary to serve the Proposed Project. The temporary backflush tank shall be screened with fencing or vegetation. Once a minimum tank size is determined (anticipated up to five years of CAPP operation),

a permanent backflush tank would be constructed that reflects the determined minimum size. Once construction on the permanent tank is completed, CVWD shall install vegetation screening to reduce the visual impact of the backflush tank. Landscaping shall be selected as determined appropriate and feasible for its compatibility with the surroundings and subject to review and approval by the City of Carpinteria's Architectural Review Board. Large container-size plantings and/or fast-growing vegetation shall be used for screening around the backflush tanks. Lighting shall be low intensity and located and designed to minimize direct view of light sources and diffusers, and to minimize halo and spillover effects. After construction is complete, CVWD shall restore all landscaped areas affected by construction, access, and equipment staging.

Figure 3.1-2 Visual Simulations of Proposed Injection Wells with Screening, under Impact 3.1-1 on page 3.1-9 of the Draft EIR, has been revised to show the new proposed Injection Well location within Well Site #3. The top left photo, labeled "Injection well at Well Site #2," has been replaced with the following photo and label:



Injection well at Well Site #3

3.4.4 Impact Statements and Mitigation Discussions

Mitigation Measure 3.4-11, on page 3.4-18 of the Draft EIR has been revised to included training for in-vessel monitoring for marine mammal species:

Mitigation Measure 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.

3.5.4 Impact Statements and Mitigation Discussions

Mitigation Measure 3.5-1b, on page 3.5-23 of the Draft EIR has been revised to clarify the kelp survey will be provided to the California Coastal Commission:

Mitigation Measure MM 3.5-1b Subtidal Biological Survey. To minimize direct project impacts to special status abalone species and offshore ESHA including rocky points, intertidal areas, subtidal reefs and kelp beds, at least 45 days prior to the start of in-water project activities, a subtidal biological survey shall be completed by a qualified biologist to document areas of kelp, special status species, and rocky reef within the Marine APE and a 100-foot buffer. Results of this survey, specifically of the kelp survey, shall be provided to the California Coastal Commission if requested. If the survey identifies rocky reefs, kelp bed, or special status species, project activities shall avoid and anchor project-related vessels at least 50 feet away from special status species and habitat, if feasible. If the area cannot be avoided, the project shall utilize techniques that minimize turbidity (i.e. installation of a turbidity curtain), scarring on rocky habitat, and down cast sand excavated at or near the outfall into sand channels away from rocky habitat. For consistency with Policy OSC-4 of the City's General Plan/Local *Coastal Land Use Plan*, a post construction survey shall be completed by a qualified biologist to document final conditions.

3.11.1 Physical Environmental Setting – Hydrology and Water Quality

The Letter of Map Revision discussion on page 3.11-4 in the Flood Hazards subsection of the Draft EIR has been revised to reflect a status update on CSD's appeal to the LOMR, from an August 19, 2019 letter from the Federal Emergency Management Agency (FEMA):

Also, a small portion of the WWTP site adjacent to Carpinteria Creek, along the eastern perimeter, was designated as a Regulatory Floodway in a Letter of Map Revision (LOMR) issued by FEMA in April 2018 in response to construction of the Caltrans Linden/Casitas Interchange Project. The LOMR mapped a majority of the WWTP site in the Regulatory Floodway of Carpinteria Creek. In May 2018, the City issued a Carpinteria Creek No-Rise Determination and Certification (River Focus, 2018) that demonstrated proposed development on the WWTP site would have no impact on the revised FEMA Regulatory Floodway or base flood elevation. Subsequently, CSD prepared a comprehensive appeal to the LOMR. This appeal is currently being reviewed by FEMA and, if upheld, would establish floodplain and floodway boundaries based on an alternative hydraulic modeling approach. With respect to the WWTP site, this model maps the regulatory floodway essentially within the banks of Carpinteria Creek. A letter from FEMA, dated August 15,

2019 states that FEMA has reviewed information provided by CSD during the LOMR appeal process and is processing a new LOMR that revises the flood hazard area for Carpinteria Creek.

3.12.4 Impact Statements and Mitigation Discussions

Impact 3.12-2 of the Draft EIR has been revised to remove reference to Mitigation Measure MM 3.14-1b and MM 3.14-1b, which were combined into Mitigation Measure 3.14-1a prior to release of the Draft EIR. This correction has been made to paragraphs 8 and 9 under Impact 3.12-2 on page 3.12-7 and 3.12-8 of the Draft EIR:

None of the proposed injection wells would be located within parking lots or other locations within the identified well site properties that would result in permanent or long-term reduction of parking spaces. Although some parking may be temporarily unavailable during construction, the Proposed Project would not result in a violation of the parking requirements for the properties. Injection wells would be designed and constructed in compliance with applicable development standards for the zoning for each identified well site. 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 3.14-1a, MM 3.14-1b, MM 3.14-1c** (see Section 3.14, *Noise*) and **Mitigation Measure MM 3.18-1** (see Section 3.18, *Transportation*) would reduce these temporary impacts to less than significant, as identified in Sections 3.14 and 3.18, respectively.

Monitoring wells would be located in roadway ROWs in residential zones within the City of Carpinteria, or within parks zoned as recreational. Monitoring wells are limited in size and footprint (maximum 3 feet in diameter) and once installed would not substantially interfere with existing use of these properties due to location and size. Construction of monitoring wells would create temporary noise and transportation impacts that could temporarily interfere with existing land uses, but implementation of **Mitigation Measures MM 3.14-1a, MM 3.14-1b, MM 3.14-1c** (see Section 3.14, *Noise*) and **Mitigation Measure MM 3.18-1** (see Section 3.18, *Transportation*) would reduce these temporary impacts to less than significant, as identified in Sections 3.14 and 3.18, respectively.

This correction was also made to the list of Mitigation Measures that applied to Impact 3.12-1 on page 3.12-8 of the Draft EIR:

Mitigation Measures

Mitigation Measures MM 3.14-1a, MM 3.14-1b, and MM 3.14-1c (see Section 3.14, *Noise*), and **Mitigation Measure MM 3.18-1** (see 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.

3.14.4 Impact Statements and Mitigation Discussions

Mitigation Measure MM 3.14-1a, on page 3.14-14 of the Draft EIR has been revised to further limit construction times and provide additional public notification and information:

Mitigation Measure 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 ~~one week~~ 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.

3.16.4 Impact Statements and Mitigation Discussions

Impact 3.16-1 incorrectly references Mitigation Measure 3.3-1 in the third paragraph (page 3.16-5 in the Draft EIR). It has been revised to correctly reference Mitigation Measure 3.1-1 in Aesthetics:

Several of the injection and monitoring wells and backflush storage tank may be located on school property or other public or semi-public sites, while one or more monitoring wells may also be located on public park sites, as shown in Figure 2-6. El Carro Park and Carpinteria Valley Memorial Park are potential monitoring well sites. Potential injection Well Site #1 would be located Canalino Elementary School's field area. Each injection well, including backwash water holding tank, is anticipated to have an operational footprint of 6,000 square feet (60 feet by 100 feet). Thus, there is a potential to reduce the available useable space at these sites. The locations of the wells have not yet been selected within the available sites, and impacts to these public or semi-public facilities would be considered in the selection of the location within the sites to reduce the potential impacts to the useable space of these public facilities to the extent feasible. Injection wells, one of which would be constructed with an aboveground storage tank, would be secured with fencing and visually screened as described in **Mitigation Measure MM-3.3-4 MM 3.1-1** (see Section 3.1.4, *Impact Statements and Mitigation Discussion – Aesthetics* ~~Section 3.1.1, Physical Environmental Setting – Aesthetics~~) to reduce potential impacts to the aesthetic character of the well site.

The list of applicable mitigation measures for Impact 3.16-1, on page 3.16-5 of the Draft EIR has been revised to correctly reference Mitigation Measure 3.1-1.

Mitigation Measures

Mitigation Measure MM 3.3-4 MM 3.1-1 (see Section 3.1.4, *Impact Statements and Mitigation Discussion - Aesthetics* Section 3.1.1, *Physical Environmental Setting—Aesthetics*) shall apply to the injection well sites. **Mitigation Measure MM 3.18-1** (see Section 3.18, *Transportation*) shall apply to all Project components.

3.18.4 Impact Statements and Mitigation Discussions

Mitigation Measure MM 3.18-1, on page 3.18-6 and 3.18-7 of the Draft EIR, has been revised to include coordination with Caltrans:

Mitigation Measure MM 3.18-1 Develop and Implement a Transportation Management Plan. 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 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.