Addendum No. 1 to Environmental Impact Report

Carpinteria Advanced Purification Project

CAPP

Replenishing Our Groundwater for the Future

State Clearinghouse #2019011016

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Acronyms

AOP	Advanced oxidation process
bgs	below ground surface
CAPP	Carpinteria Advanced Purification Project
CCR	California Code of Regulations
CEQA	California Environmental Quality Act
CVWD	Carpinteria Valley Water District
EIR	Environmental Impact Report
MF	microfiltration
MGD	million gallons per day
MMRP	Mitigation Monitoring and Reporting Program
MS4	Municipal Separate Storm System
PWPS	Purified water pump station
RWO	right-of-way
SCH	State Clearinghouse
UF	ultrafiltration
WWTP	Wastewater Treatment Plant

1. INTRODUCTION

This document is Addendum No. 1 to the Carpinteria Advanced Purification Project Environmental Impact Report (State Clearinghouse [SCH] No. 2019011016), referred to hereafter as the "EIR". This Addendum to the EIR has been prepared pursuant to the California Environmental Quality Act (CEQA), Public Resources Code Section 15164.

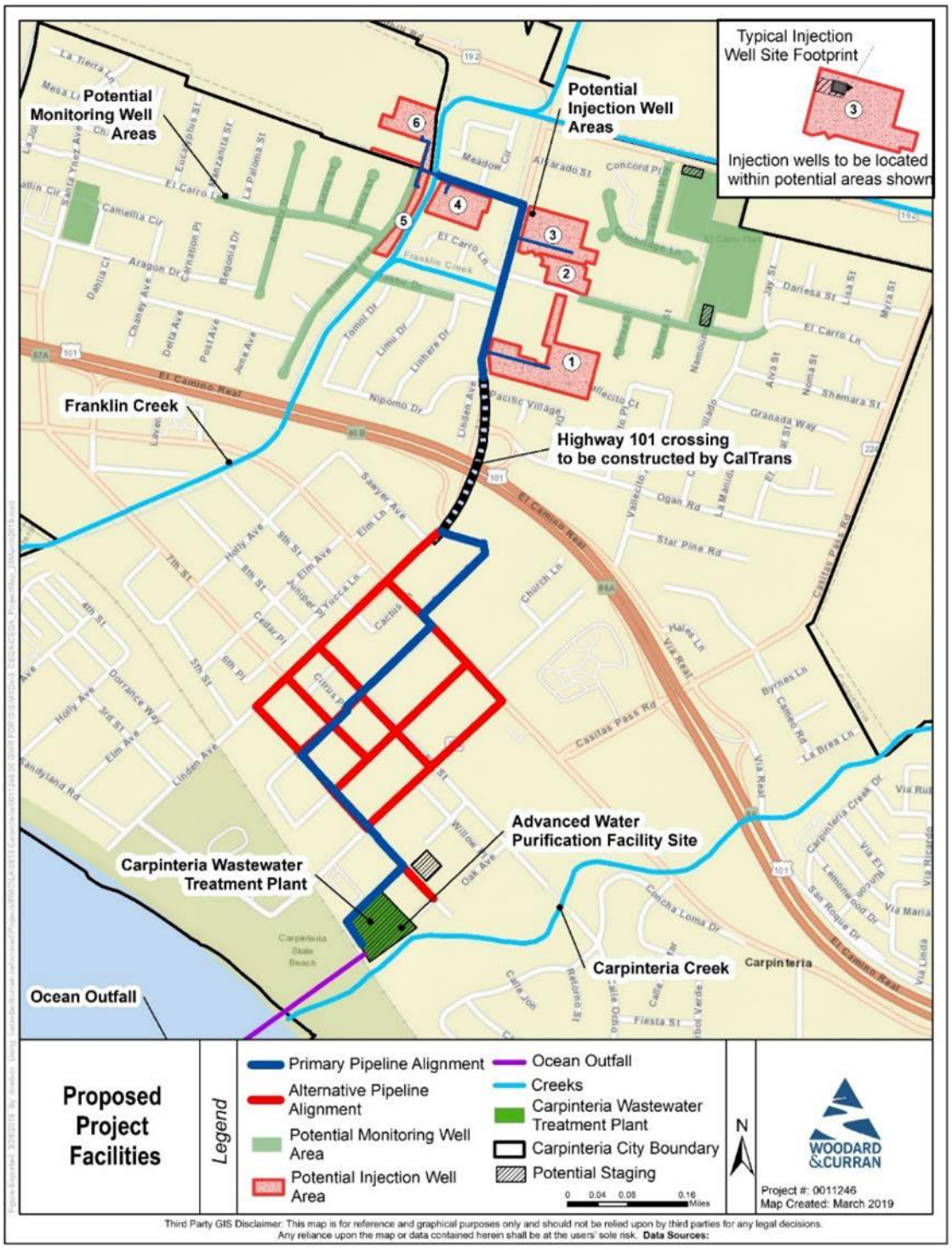
1.1 Background

On December 11, 2019 Carpinteria Valley Water District (CVWD) adopted the EIR and Mitigation Monitoring and Reporting Program (MMRP) for the Carpinteria Advanced Purification Project (Approved Project). In September 2023, as part of final design activities, CVWD determined the need to include changes to the Approved Project. An Addendum to the EIR has been identified as the appropriate CEQA documentation to address these proposed changes (see *Section 1.3* below).

1.1.1 Approved Project

The EIR analyzed the environmental impacts of the construction and operation of an advanced water purification facility (AWPF), injection wells, monitoring wells, and conveyance pipelines in the City of Carpinteria and unincorporated Santa Barbara County, shown in **Figure 1-1**. The majority of the Approved Project is located primarily in the City of Carpinteria, with one proposed well site in unincorporated Santa Barbara County (Well Site #6). The Approved Project footprint covers the AWPF site at 5351 Sixth Street (co-located with Carpinteria Sanitary District's [CSD] Wastewater Treatment Plant [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 were identified in the EIR, though only three would be selected as design continues and property rights are acquired. A sixth potential injection well site was included in the project alternatives, shown here as the Franklin Creek park site (Well Site #5 in the EIR). Conveyance pipelines between the AWPF and the injection wells would generally run within the public roadway rights-of-way (ROW) or existing CVWD easements. The pipeline would cross U.S. Highway 101 at the Linden Street Overpass in a pipeline casing installed by Caltrans as part of a separate project. The Approved Project is roughly bounded to the east by Carpinteria Creek, the south by the Pacific Ocean, the west by Sterling Avenue, and the north by Foothill Road/Highway 192. When completed, the Approved Project would produce approximately 1,100 acre-feet per year (AFY) of purified water from the CSD WWTP for injection into the local groundwater basin. This water would ultimately be used for CVWD potable water supply, and existing CVWD production wells would be used to recover treated water from the groundwater basin.

Figure 1-1: Approved Project Evaluated in EIR



As described in the Final EIR, the Approved Project's facilities consist of:

- Advanced Water Purification Facility consisting of equalization tank, ultrafiltration (UF), reverse osmosis (RO), and an advanced oxidization 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 two individual injection wells (1,000 LF of pipeline to each well)
- 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 discharge piping to existing storm drain culverts
- Up to six monitoring wells, each consisting of either nested wells (three different casings in each well nesting in a single borehole) or three individual wells at different depths (cluster)
- Modifications to the CSD WWTP ocean outfall

1.1.2 Proposed Modified Project

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

Alternative Location for Well Site #3 - Linden Injection Well

The Modified Project is considering alternative locations for the injection well proposed for Well Site #3, which is now referred to as the Linden Injection Well under the Modified Project. The Modified Project maintains the potential placement of the well at the corner of the parcel near Linden Avenue as described in the EIR, but includes a new potential location for the well in the roadway ROW on Linden Avenue, approximately 250 feet north of the intersection of Linden Avenue and El Carro Lane. This well would have a similar size and depth as originally described in the Approved Project and would be constructed in the same manner as originally approved, though the wellhead would be located below-ground in a manhole instead of a below-ground vault. Above-grade appurtenances and electrical controls will be located inside a fenced enclosure within the ROW along the sidewalk or within the parcel.

Alternative Location for Well Site #4 - Meadow View Injection Well

The Modified Project includes an alternative location for the injection well at Well Site #4. The new location would be the roadway ROW on Meadow View Lane adjacent to the Well Site #4 parcel, owned by the Church of Latter-day Saints. The new location would be located approximately 350 feet west of the intersection of Meadow View Lane and Linden Avenue. This well would have a similar size and depth as originally described in the Approved Project and would be constructed in the same manner as originally approved, though the wellhead would be located below-ground in a manhole with above-grade appurtenances and electrical controls located behind the sidewalk in the roadway ROW. Above-grade equipment will be inside a fenced enclosure within the ROW along the sidewalk. Restoration to sidewalk and paving is subject to City permitting. The addition of the Meadow View Lane ROW as a proposed location for the injection well does not change the total number of injection wells planned for the project. Under the Modified Project, there would no longer be a backwash storage tank constructed at Well Site #4. Instead, a buried pipeline is proposed that will be sufficient in size to convey the injection well backwash to the sewer collection system, eliminating the need for the above-ground storage tank. This buried 48-inch pipeline in Meadow View Lane will allow for the backwash would be conveyed to the sewer system along Linden Avenue and returned to CSD's water reclamation plant for advanced water purification back into the groundwater system. Staging and soundwalls may be located on existing paved surfaces within 50 feet of the Franklin Creek embankment, though the environmental commitments included in the EIR, including compliance with permit requirements (including implementation of a Stormwater Pollution Prevention Plan) and keeping the areas clean of trash and debris, would be implemented to avoid potential impacts to the creek.

Expansion of Monitoring Well Locations

The Modified Project would expand the potential locations for monitoring well clusters to include injection Well Site #2 and injection Well Site #3 of the Approved Project, the roadway ROW at the western end of Meadow View Lane (adjacent to injection Well Site #4), as well as to CVWD headquarters at 1301 Santa Ynez Road and the adjacent roadway ROWs. The total number of monitoring wells, size, depth, and construction methods would remain the same as the Approved Project, with up to four monitoring well clusters being constructed for the Project, though one monitoring well cluster at El Carro Park has already been constructed and is not included in this analysis. **Figure 1-2** shows the expanded locations to be considered for monitoring wells based on final design, modeling, and permitting requirements.

Modifications to the AWPF Layout

The Modified Project includes changes to the AWPF layout, although all facilities would remain within the CSD WWTP site. Layout changes have resulted in an increase in total building height from 20 feet above grade to 30 feet above grade, and increased the total footprint of the AWPF Process Building from 8,900 square feet to approximately 12,000 square feet with the Process Building at 8,300 square feet and the exterior canopy over the chemical and ultra-violet (UV) reactor at 3,700 square feet. The 200,000 gallon

equalization tank will be completely buried, increasing the excavation depth to approximately 21 feet, and eliminating the 27-foot tall above-ground equalization tank that was included in the Approved Project. The AWPF treatment train would remain the same as described in the Approved Project, and include ultrafiltration (UF), reverse osmosis (RO), advanced oxidation process (AOP) with UV and free chlorine, with a slight increase in overall treatment capacity from 1.2 MGD in the Approved Project to up to 1.3 MGD in peak conditions under the Modified Project. The Modified Project would average 1.0 MGD for an estimated total average purified effluent of 1,100 AFY, consistent with the Approved Project. The foundation for the building will be supported by deep-soil cement-mixing, instead of driven or drilled piles. Staging would occur within the paved areas of the AWPF site, including within 50 feet of the wall bordering Carpinteria Creek.

In summary, the Modified Project's facilities consist of the following elements, with modifications addressed in this Addendum shown in **bold**:

- Advanced Water Purification Facility consisting of below grade equalization tank, below grade waste tank, UF, RO, and an AOP), systems, to be located on the WWTP site, **with an expanded building height, buried equalization tank, increased treatment capacity and supported on stabilized soils via deep-soil cement mixing ground improvements.**
- Purified Water Pump Station (PWPS) and 10,000 gallon below grade clearwell, to be located on the WWTP site
- 6,100 linear feet (LF) of 10-inch conveyance pipeline from the PWPS to a well lateral split point, including Caltrans installation for the Linden Avenue overpass over U.S. Highway 101
- 1,000 LF of 8-inch conveyance pipeline from the well lateral split point to two individual injection wells **(a reduction of 1,000 LF of pipeline)**
- Up to two 14-inch diameter injection wells with backwash pumps **including a change in the potential location of two previously planned injection wells from parcels to the roadway ROW, the elimination of one injection well, and elimination of a 42,000 gallon storage tank.**
- 600 LF of pressurized 12-inch piping and **400 LF of gravity 48-inch well backwash discharge piping** to existing sanitary sewers; including associated sewer manholes and air-gap discharge to sewer near wellheads; **a reduction of 400 total LF of backwash piping and avoidance of backwash discharge to the storm system.**
- Up to three monitoring well clusters, **including expanded potential locations and representing a reduction in total number of monitoring well clusters from the Approved Project.**

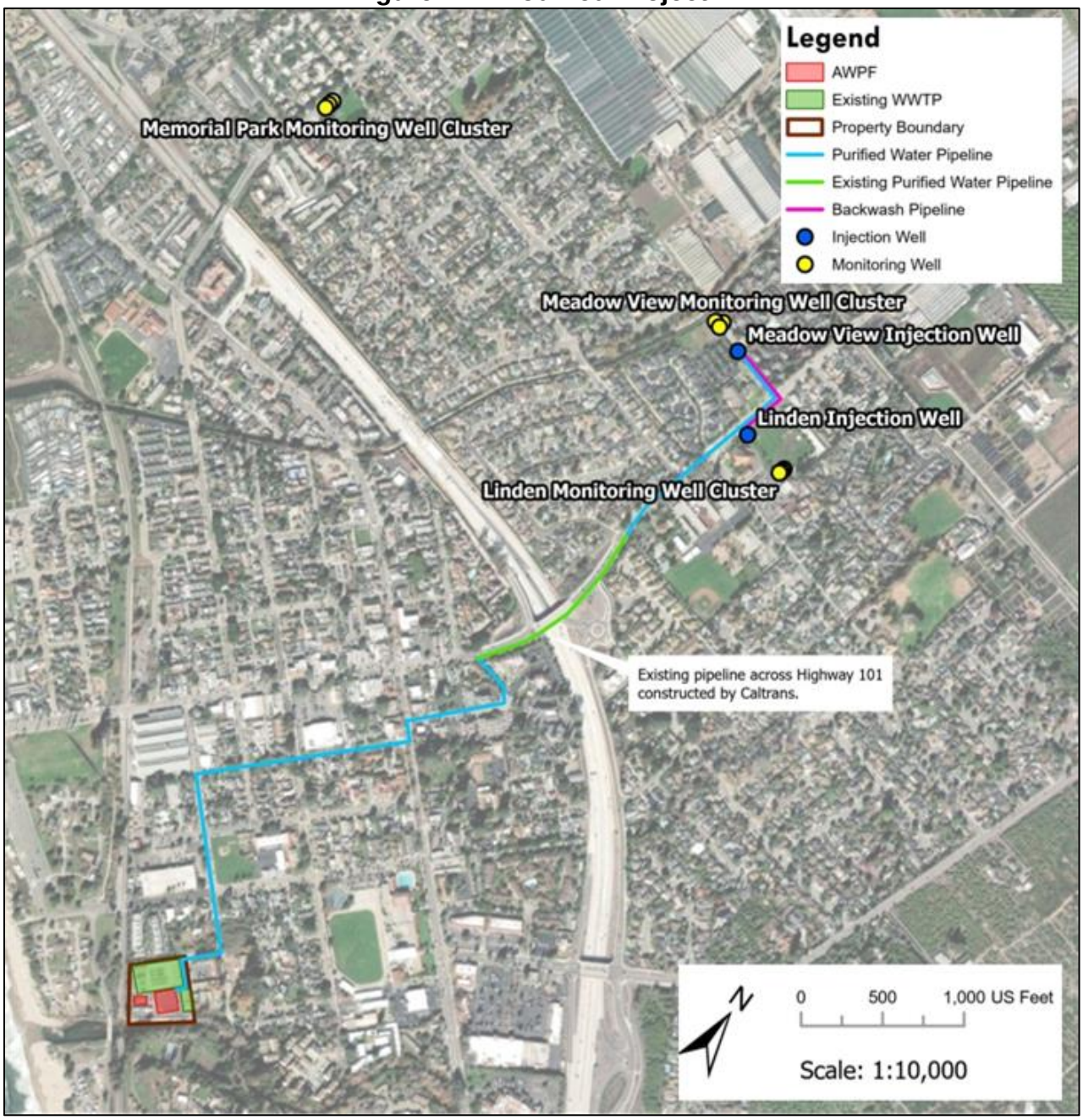
Modifications to the ocean outfall have already been completed, consistent with the EIR. One monitoring well cluster (El Carro monitoring wells) were completed as a separate project and were addressed via an MND, because they are part of the Carpinteria Groundwater Sustainability Agency's groundwater monitoring program and not specific

to the Approved or Modified Project. For these reasons, neither the ocean outfall modifications nor the El Carro monitoring wells are part of the Modified Project. Additionally, the Modified Project eliminates the need for the Franklin Creek crossing included in the Approved Project.

1.2 Purpose of Addendum

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

Figure 1-2: Modified Project



1.3 Basis for Addendum

Section 15164 of the CEQA Guidelines states: “The lead agency or a responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.” Pursuant to Section 15162 of the CEQA Guidelines, no subsequent EIR may be required for the project unless the lead agency determines, on the basis of substantial evidence, that one or more of the following conditions are met:

A. When an EIR has been certified or a negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:

(1) Substantial changes are proposed in the project which would require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

(2) Substantial changes occur with respect to the circumstances under which the project is undertaken which would require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

(3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:

(a) The project would have one or more significant effects not discussed in the previous EIR or negative declaration;

(b) Significant effects previously examined would be substantially more severe than shown in the previous EIR;

(c) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

(d) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

B. If changes to a project or its circumstances occur or new information becomes available after adoption of a negative declaration, the lead agency shall prepare a subsequent EIR if required under subdivision a). Otherwise the lead agency shall determine whether to prepare a subsequent negative declaration, an addendum, or no further documentation.

C. Once a project has been approved, the lead agency's role in project approval is completed, unless further discretionary approval on that project is required. Information appearing after an approval does not require reopening of that approval. If after the project is approved, any of the conditions described in subdivision a) occurs, a subsequent EIR or negative declaration shall only be prepared by the public agency which grants the next discretionary approval for the project until the subsequent EIR has been certified or subsequent negative declaration adopted.

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

1.4 Evaluation of Environmental Impacts

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

- Aesthetics;
- Agriculture Resources;
- Air Quality;
- Biological Resources;
- Cultural Resources;
- Energy;
- Geology and Soils;
- Greenhouse Gas Emissions;
- Hazards and Hazardous Materials;
- Hydrology and Water Quality;
- Land Use and Planning;
- Mineral Resources;
- Noise;
- Population and Housing;
- Public Services;
- Recreation;

- Transportation;
- Tribal Cultural Resources;
- Utilities and Service Systems; and
- Wildfire

The Modified Project would involve a change in the location of two previously planned injection wells for advanced purified water, a reduction in the number of injection wells from three to two, and changes to the layout and final design of treatment facilities for the Carpinteria Advanced Purification Project. It would also expand the potential location of monitoring wells and reduce the overall number of monitoring wells. The change in location of the injection wells would not result in a meaningful change in the length of pipeline constructed and would move two injection wells from parcels to the roadway ROW. The change to the layout and design at the AWPF would increase the height of the structures to 30 feet. The methods of construction (i.e., drilling, pavement cutting, grading, trenching, and restoration) are the same as, or very similar to, those evaluated in the EIR. The overall excavation required for the Modified Project would be less than what was assumed in the environmental analysis for the Approved Project in the EIR based on refined design details. The Modified Project would result in a 15 percent reduction in the number of haul trips compared to the Approved Project. Based on the similarities in construction methods and location of the Approved Project and the Modified Project, and based on the reduction in overall excavation required for the AWPF structures, the environmental analyses provided in the EIR remains current and applicable to the Modified Project. The conclusions and mitigation measures in the EIR are applicable to the Modified Project. As explained below, the Modified Project is not associated with new significant impacts or greater severity of impacts compared to the Approved Project.

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

3.1 Aesthetics
3.1-2) Damage scenic resources within the viewshed of a State scenic highway
3.2 Agriculture and Forestry Resources
3.3 Air Quality
3.4 Biological Resources
3.4-4) Interfere substantially with the movement of fish or wildlife;
3.4-6) conflict with local, regional, or state habitat conservation plan
3.5 Marine Biological Resources
3.5-6) conflict with local, regional, or state habitat conservation plan
3.6 Cultural resources

3.6-1) cause substantial adverse change in the significance of a historical resource

3.7 Energy

3.8 Geology and Soils

3.8-1.i) cause potential substantial adverse effects involving rupture of known earthquake fault;

3.8-1.iv) cause potential substantial adverse effects involving landslides;

3.8-4) have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems

3.9 Greenhouse Gas Emissions

3.10 Hazards and Hazardous Materials

3.10-5) within two miles of a public airport or public use airport result in a safety hazard or excessive noise

3.11 Hydrology and Water Quality

3.11-2) substantially decrease groundwater supplies or interfere substantially with groundwater recharge

3.110-3) substantially alter the existing drainage pattern of the site or area

3.12 Land Use and Planning

3.12-1) physically divide an established community

3.13 Mineral Resources

3.14 Noise

3.14-2) within two miles of a public airport or public use airport, would the Project expose people residing or working in the Project area to excessive noise levels

3.15 Population and Housing

3.16 Recreation

3.17 Transportation

3.17-2) conflict with CEQA Guidelines Section 15064.3, subdivision (b)

3.18 Utilities and Service Systems

3.19 Wildfire

3.19-4) expose people or structures to significant risks as a result of runoff, post-fire slope instability, or drainage changes

3.20 Environmental Justice

This Addendum evaluates environmental resources where the proposed Modified Project changes could result in changes to impacts and environmental resources that were potentially significantly impacted by the Approved Project and required mitigation as disclosed in the EIR. Because of the Modified Project's similarity to the Approved Project in construction methods, and because the Modified Project would result in a reduction of overall excavation, there is the potential for the Modified Project to have similar or lesser impacts as the Approved Project.

1.5 Summary of Findings

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

2. PROJECT DESCRIPTION

2.1 Purpose of Project

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

The objectives of the Modified Project are the same as the original EIR, with a slight change in the total volume of water and treatment capacity, neither of which represent a meaningful difference in project objectives. The change in the objective related to volume is shown in strikeout:

1. Create a new, drought-resistant, reliable supply of local water.
2. Produce approximately 1,100 AFY on average advanced treated water suitable for groundwater recharge and potable reuse (at ~~1.0~~ 1.3 MGD capacity)~~, with the ability to expand to up to 1,200 AFY (at 1.2 MGD capacity)~~.
3. Reduce CVWD's reliance on imported surface water and storage at Lake Cachuma.

2.2 Description of Modified Project

The proposed Modified Project would expand the potential locations for two injection wells, expand the area that monitoring wells may be located in, and refines the layout of the AWPF. There would be a reduction in the overall number of injection wells and monitoring well clusters, and despite a small increase in the treatment capacity of the AWPF from 1.2 MGD to 1.3 MGD, the average flows and annual production would remain the same as the Approved Project at 1.0 MGD and 1,100 AFY, respectively. This does not represent a meaningful change to the overall size of the proposed Project. There would be no change to the location of the conveyance pipelines.

2.2.1 Changes to Injection Wells

Alternative Location for Well Site #3 - Linden Injection Well

Under the Modified Project, the injection well located at Well Site #3, the parcel belonging to the Saint Joseph Catholic Church, would either be constructed within the parcel, similar to the Approved Project, or in the roadway ROW on Linden Avenue, immediately adjacent to the Well Site #3 parcel. Under the Modified Project, this well is referred to as the Linden Injection Well. If the Linden Injection Well remains in the parcel, the details of the final location within the parcel, and the anticipated layout of the well, electrical, and fencing has been refined from that described in the Final EIR, and is shown in Figure 2-1.

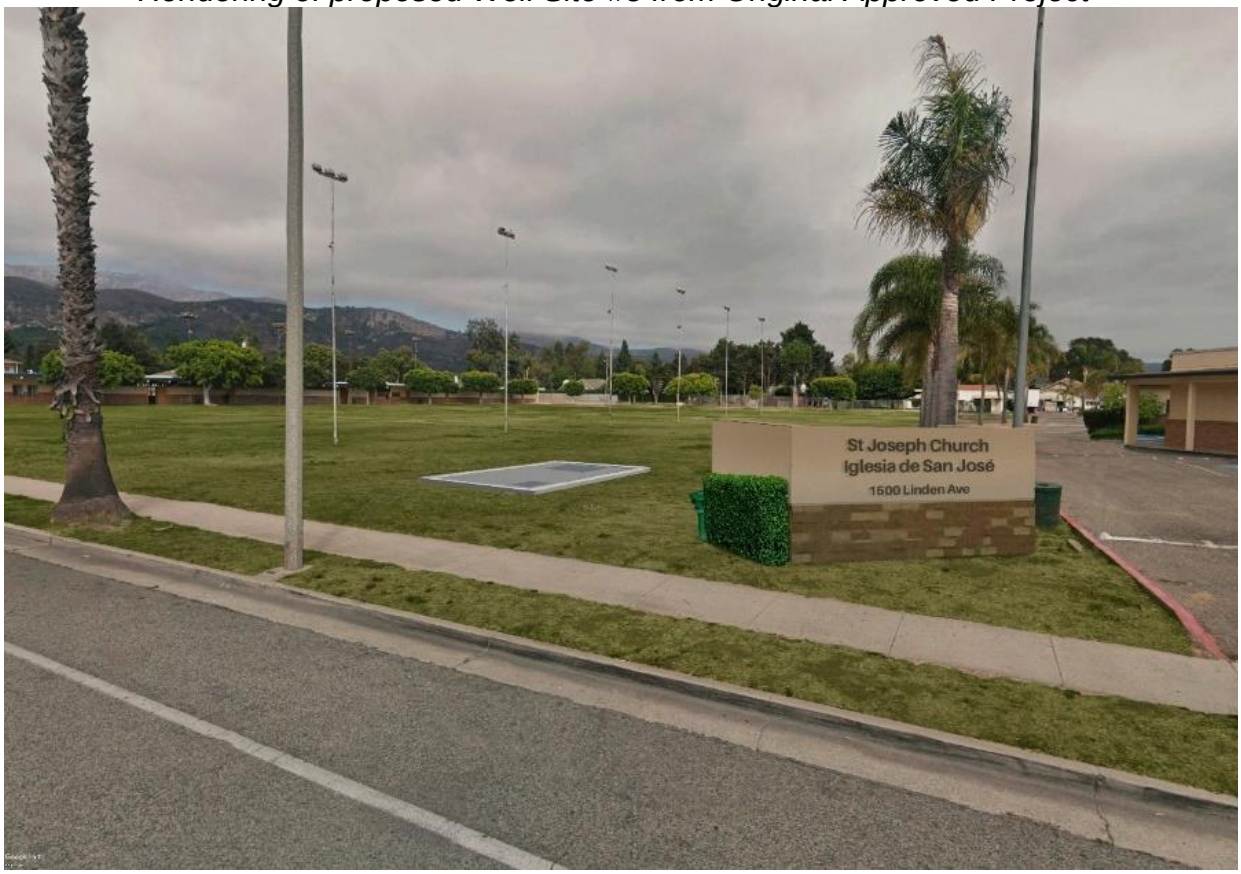
As with the Approved Project, the wellhead of the Linden Injection Well would be housed in a below-ground manhole and would be a single-completion well having one 26-inch diameter borehole with 14-inch diameter casing and screening in the A, B, and C aquifer zones. The well would reach a maximum depth of 1,240 feet below ground surface (bgs).

The well equipment would include injection supply lines, flow meters, air release valves, pressure-regulating valves, and controls for down-hole flow control valves. The well equipment and associated piping and appurtenances would be located above grade in a400 square foot fenced and paved area. An electric/pneumatic control panel would be installed within the well equipment area. The fencing would be consistent with the existing fencing at the site, which was added after the EIR was certified. An electrical transformer and service would be required to be installed near the well equipment in compliance with Southern California Edison standards. The wellhead would be located in small below grade manhole or vault approximately five feet in diameter, in addition to below grade piping to the well equipment pad area. 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 construction method would remain consistent with the Approved Project, and may require 24-hour drilling.

Figure 2-1: Well Site #3 Layout from Approved Project and Modified Project

Rendering of proposed Well Site #3 from Original Approved Project



Rendering of refined Linden Injection Well site, if located within the Well Site #3 parcel

VIEW 1: LINDEN WELL - LOOKING SOUTH

VIEW 2: LINDEN WELL - LOOKING WEST

Alternative Location for Well Site #4 – Meadow View Well

The Modified Project would expand injection Well Site #4, at the Church of Jesus Christ of Latter-day Saints to include the adjacent roadway ROW on Meadow View Lane. The injection well would be located in the ROW approximately 350 feet west of the intersection with Linden Ave. This well is referred to as the Meadow View Well under the Modified Project. The revised location is shown in Figure 1-2.

The construction of the Meadow View Well would remain the same as described for the Approved Project in the EIR. The wellhead would be housed in a below-ground manhole and would be a single-completion well having one 26-inch diameter borehole with 14-inch diameter casing and screening in the A, B, and C aquifer zones. The well would have a maximum depth of 1,240 feet bgs. The well equipment would include injection supply lines, flow meters, air release valves, pressure-regulating valves, and controls for down-hole flow control valves. The well equipment and associated piping and appurtenances would be located above grade in a 400 square foot fenced and paved area outside the traffic roadway within the City ROW. An electric/pneumatic control panel would be installed within the well equipment area. The fencing would be consistent with City of Carpinteria requirements. Modifications to the sidewalk at this location would be as directed by the City of Carpinteria. Electrical power would be sourced from the nearby Southern California Edison transformer located at the Linden Injection Well approximately 1,000 feet away. The wellhead would be located in small below grade manhole or vault approximately 5 feet in diameter in addition to below grade piping to the well equipment pad area. Additional site grading would be completed around the wellhead vault to improve drainage along with additional onsite catch basins to connect to the existing catch basin. Existing sidewalk between the proposed well location and west to Franklin Creek may be removed permanently, a length of approximately 150 feet subject to City of Carpinteria requirements. 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 revised well layout is shown in **Figure 2-2**.

The storage tank that would have been located at injection Well Site #4 in the Approved Project, would no longer be constructed. Instead, a buried 48-inch backwash pipeline would be installed to convey the injection well backwash water to the existing sewer collection system along Linden Avene. The benefit of the pipeline is it will return this backwash flow via the sewer system through CSD's water reclamation plant and advanced water purification back into the groundwater basin. This also avoids backwash discharge to the stormwater system and Franklin Creek. The 400-LF of 48-inch diameter pipeline would use construction methods consistent with pipeline installation described in the EIR, anticipated to be open cut trenching.

Figure 2-2: Rendering of Meadow View Well Looking South

Injection Well Construction

As described in the EIR for the Approved Project, construction of the injection wells include soil improvements, civil site work and grading, concrete construction, well drilling and installation, site piping, mechanical, electrical, instrumentation, controls, SCADA systems, and equipment installation. Well drilling may require up to four weeks of 24-hour drilling for each well, and would include drilling a pilot hole, reaming, and well construction. Overall construction of each injection well from mobilization through site restoration may require up to 20 weeks. The impacted area during construction would be limited to approximately 10,000 square feet with a final well permanent access area of approximately 60 feet by 40 feet. Vegetation, such as hedges, would be restored per property owner direction or sidewalk repairs per property owner direction.

Sound walls may be repurposed or expanded to allow for adjacent monitoring well construction to minimize site impacts by having a single sound barrier constructed. Due to site constrictions, sound walls may be erected within 50 feet of the Franklin Creek embankment, but would remain within existing paved areas.

Electrical service would be required at each injection well to provide power to the well's motor control center (MCC) and well pump motors. The electrical meter panel, switchgear and MCC would be located above-grade and would be an approximately 11-foot long by 2-foot wide footprint. A single electrical service from the Linden Injection Well would

power both wells. The above-grade well equipment would be within a 400 square foot fenced enclosure.

2.2.2 Expansion of Potential Monitoring Well Locations

The area where monitoring wells would be located has been expanded from the areas identified in the EIR and now include the Well Site #2 and Well Site #3 parcels, as well as the roadway ROW adjacent to Well Site #4, at the western end of Meadow View Lane. The Modified Project retains the potential monitoring well locations included in the EIR, which are shown in **Figure 1-1**. The expanded monitoring well locations are shown in **Figure 1-2**.

Monitoring Well Construction

Design and construction of the monitoring wells would be consistent with the Approved Project, and may require 24-hour drilling. Each monitoring well would be constructed as monitoring well "clusters" where each well cluster would include three individual boreholes drilled near each other. Each cluster would have a 12.25-inch diameter borehole. Each borehole within the cluster would have a 2-inch casing installed for each aquifer at different depths (Zone A, B, and C) for monitoring purposes. The well completion for Zone A would have a maximum depth of 370 feet bgs; the completion for Zone B would have a maximum depth of 935 feet bgs; and the completion for Zone C would have a maximum depth of 1,210 feet bgs. During construction, monitoring wells would require up to 10,000 square feet for construction equipment and drilling which is an increase from the 5,000 square feet assumed in the Approved Project. The actual disturbance area for drilling the monitoring wells would be approximately nine square feet for each borehole.

Sound walls may be repurposed or expanded to allow for adjacent injection well construction to minimize site impacts by having a single sound barrier constructed.

2.2.3 Modifications to the AWPF

Under the Modified Project, the AWPF layout would be modified. Specifically, the AWPF Process building would be 12,000 square feet compared to 8,900 square feet under the Approved Project, with the enclosed AWPF Process Building at approximately 8,300 and chemical storage area and UV reactor outside under a 3,700 square foot canopy. The chemical storage and feed area would be moved from spanning the width of the building to occupying a corner of the building. The clearwell and purified water pump station would be moved from the southern side of the site to the southwest side of the AWPF Process Building to be located under the UV reactor canopy. The equalization tank, UF feed, and UF disc filter system would be located in approximately the same location as the Approved Project, but the 200,000gallon equalization tank would be below grade. As with the Approved Project, there would be no new facilities located within the 50-foot setback from the top of the bank of Carpinteria Creek.

Under the Modified Project, the total facilities footprint at the AWPF including the building, clearwell, and equalization tank would be approximately 15,000 square feet, an increase

from the 11,000 square feet included in the Approved Project. Below ground facilities, including the purified water clearwell, waste equalization tank, and equalization tank, would range from 8 feet to 21 feet deep, and the AWPF structure would be 30 feet tall compared to 20 feet for the AWPF process building under the Approved Project. Excavation of up to 21 feet in depth could be required to construct the belowground tanks As was included in the Approved Project, excavation up to 20 feet in depth may be required to remove an existing buried and abandoned circular primary clarifier (roughly 67 feet outside diameter), located approximately 10 feet west of the proposed AWPF.

Soil stabilization is recommended under the AWPF Process Building. Deep soil mixing has been selected as the preferred approach and produces lower noise levels over a driven pile system or drilled piles, both of which were included in the Approved Project. This change eliminates the use of a pile driver during construction of the Modified Project. Deep soil mixing improves weak soils prone to liquefaction by mixing them with a dry cementitious binder or slurry. A drilling rig is used to drill into the soil to a depth that is to be modified, and cement and water are injected directly into the soil through the mixing blade. This allows the combined soil and cement to be mixed in place with minimal excavation or spoils. The drill auger is then slowly withdrawn to the surface while the cement is simultaneously pumped and mixed into the soil layers. Depth and number of drillings will be subject to final design. Deep soil mixing will be limited to the approximate footprint of the AWPF Process Building, chemical storage area and UV canopies, and clearwell tank under the UV canopy equal to approximately 12,000 square feet. Helical anchors will be utilized for soil stabilization under the equalization tank.

Approximately 10,180 cubic yards of soil would be excavated for shoring and foundation support of the AWPF building, equalization tank and clearwell, though 4,000 - 5,000 cubic yards of these soils would be reused onsite as engineered fill.

The 200,000-gallon secondary effluent equalization tank is anticipated to be located below grade and located north of the existing chlorine contact basin. The tank would be a buried cast-in-place concrete tank with a footprint of approximately 3,000 square feet

The Approved Project's AWPF layout along with the Modified Project's layout are provided in **Figure 2-3** and **Figure 2-4.** These changes to the AWPF layout would increase the overall aboveground building height from 20 feet in the Approved Project to 30 feet under the Modified Project. A rendering of the AWPF structure under the Modified Project is provided in **Figure 2-5**.

Figure 2-3: AWPF Site Layout under Approved Project

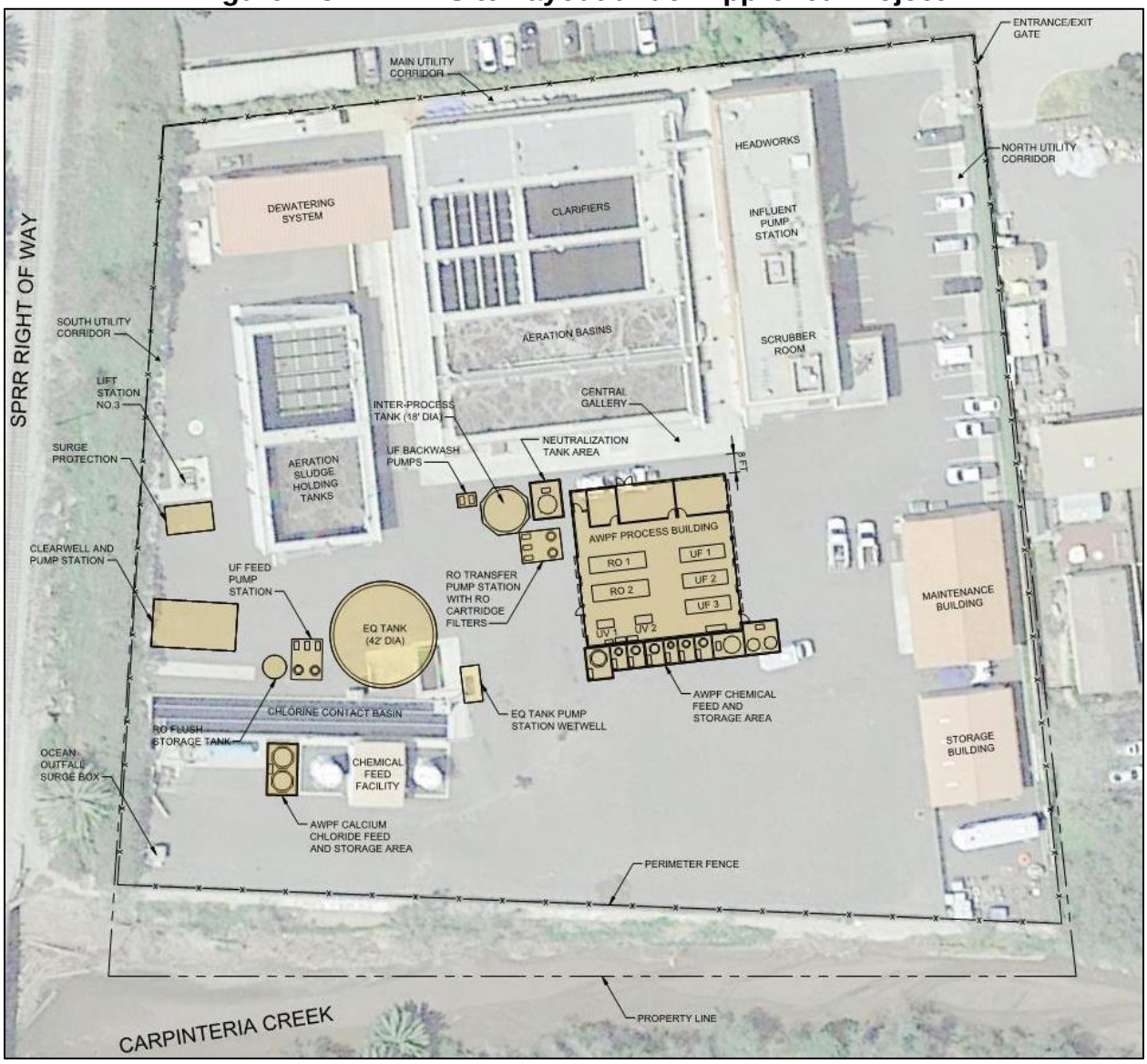


Figure 2-4: AWPF Site Layout under Modified Project

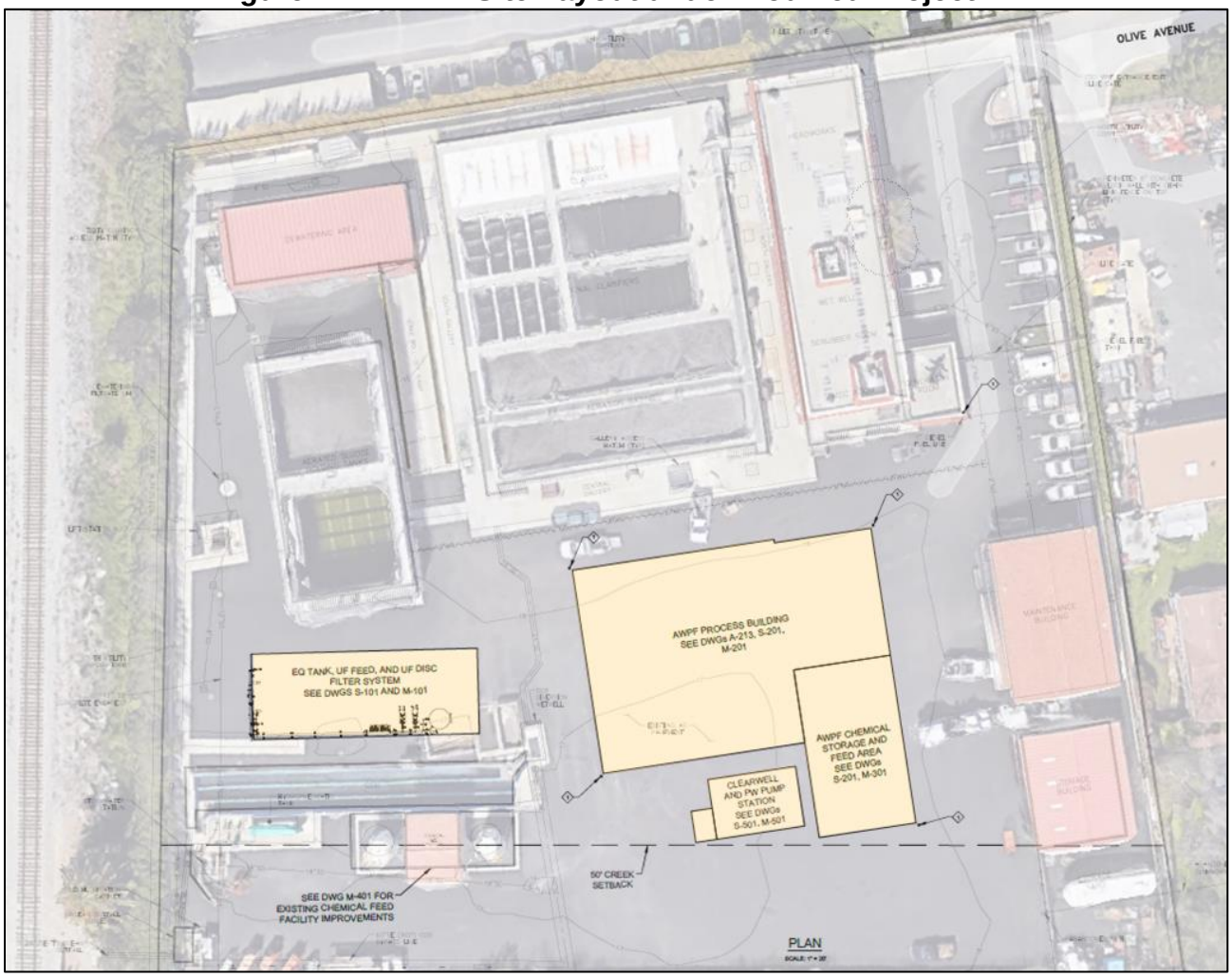


Figure 2-5: Rendering of AWPF Under the Modified Project

2.2.4 Construction Equipment and Staging

The construction equipment required for well construction and the AWPF under the Modified Project would be similar as for the Approved Project, though the Modified Project eliminates the need for a pile driver as well as trenchless auger/drill rig. The Modified Project's construction equipment is listed in **Table 2-1**.

Table 2-1: Construction Equipment

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

Staging areas would be selected using the same criteria described in the EIR for the Approved Project, and are expected to be consistent with the Approved Project. Staging for the facilities to be constructed at the WWTP site would occur on the CSD WWTP site. Staging areas for the injection and monitoring wells would be within the temporary construction easement for each well site. Staging for the pipelines would be located generally on vacant and CVWD- or CSD-owned parcels in the vicinity of the construction activities, such as the CVWD headquarters, or within the construction footprint. If staging areas use pavement or roadway rights-of-way, these areas would be re-surfaced as appropriate to conform to pre-construction conditions and consistent with applicable City standards. Staging would involve storage of pipe, equipment, spoils, and other materials. During construction, staging may be within 50 feet of Franklin Creek's embankment (injection Well Site #4) or within 50 feet of Carpinteria Creek (AWPF). In both instances, staging would be located within previously paved areas, and in the case of staging at he AWPF, it would be within the existing paved and walled site. The Project would continue to implement the environmental commitments in the EIR, including compliance with permits and keeping sites clear of trash and debris.

2.2.5 Construction Trip Generation

During construction, the Modified Project would generate trips associated with construction crews and material deliveries. Construction of the Modified Project would generate up to approximately 14,800 round-trip trips during the duration of the construction period, including approximately 1,330 round trips for off hauling of export material, 4,370 round trips for delivery of materials from vendors, and 9,100 round trips for workers. This is approximately 15 percent fewer round-trip trips than the Approved Project, which had used a conservative approach and evaluated a total of approximately 17,370 round-trips during construction.

2.2.6 Construction Schedule

In total, construction of the Project, including the modified elements, is estimated to take approximately 36 months, with anticipated commencement in Q3 2025 and completion in Q3 2028, which is three years later than the initial construction schedule published in the EIR. Construction of all Project components (injection and monitoring wells, conveyance pipelines, and AWPF) would occur simultaneously.

2.2.7 Project Operation and Maintenance

The Modified Project would reduce the total number of monitoring or injection wells, and although it would increase the treatment capacity of the AWPF by 0.1 MGD from the Approved Project, it would generate the same average annual flows as the Approved Project, so this change is not considered substantial. Because the Modified Project includes fewer wells but the same kinds of facilities as the Approved Project, there would be no changes to operation and maintenance (O&M) for each of the proposed Project's key facilities. These O&M activities include:

- AWPF:
  - Daily inspections and maintenance of UF, RO, and UV/AOP treatment processes.
  - MF/UF: Backflush for 60 to 120 seconds at 20- to 40-minute intervals; daily chemically enhanced backwash cleans; weekly to monthly chemical clean-in-place. Membranes estimated to be replaced every six years.
  - RO: Chemical CIP monthly; membranes estimated to be replaced every five years.
- Pump stations: daily inspections and routine pump maintenance
- Pipelines: periodic inspections of pipeline and exercising valves
- Injection wells: periodic backflush one time per week per well for approximately 60 minutes; backflush flowrate up to two times the injection flowrate, anticipated to be 900 gallons per minute, weekly inspections by CVWD staff.
- Chemical delivery: deliveries of AWPF chemicals, up to eight truck trips per month depending on chemical supplier and logistics
- Monitoring wells: periodic visits to conduct water sampling and monitoring

2.3 Environmental Commitments

Environmental commitments shall be consistent with those included in the Final EIR for the Approved Project, with minor adjustments shown in strikeout to clarify environmental commitments that would not be required under the Modified Project because the related project components have either changed or been removed under the Modified Project. These environmental commitments shall be included in the Modified Project's plans and specification and in its construction contracts, and are in addition to compliance with

applicable permits, laws, and regulations. These environmental commitments are part of the Modified Project.

- **Time construction to reduce interference with community needs.** Construction timing shall avoid construction near schools during the school year to the extent feasible, and avoid construction on the portion of Linden Avenue south of Highway 101 that runs through the downtown core during high tourism and shopping periods (e.g., summer and the Christmas holiday season). Timing construction in this way would reduce impacts to students and schools, as well as reduce potential impacts to the commercial corridor on Linden Avenue, supporting the local economy.
- **Avoid nighttime activities where possible during construction and operation.** To the extent reasonable, CVWD and CSD shall comply with the timing of construction as outlined in the City's Municipal Code, and shall obtain permits for any nighttime construction. During operation, CVWD and CSD shall avoid truck trips, deliveries, and maintenance activities during nighttime hours, except in the case of emergencies or where avoidance of nighttime hours are infeasible.
- **Provide biological and cultural resource training to workers.** CVWD shall provide biological sensitivity and cultural resource awareness training. These trainings shall be conducted by a certified biologist and archaeologist, respectively. Workers shall be trained to identify sensitive species and to halt work and consult with a biologist if sensitive species are encountered unexpectedly. ~~Workers 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 2-2**, may reflect the mitigation measures proposed in this EIR, and may include additional environmental commitments suggested by the permitting entity. CVWD shall obtain and comply with the SWRCB's General Construction Permit, including preparation of a Storm Water Pollution Prevention Plan (SWPPP), for all Project facilities. CVWD and/or CSD shall prepare appropriate noticing as required for permits, such as may be required for the California Coastal Commission Coastal Development Permit.
- **Coordinate with Caltrans.** CVWD shall coordinate with Caltrans to secure an encroachment permit for any construction work within the State's right-of-way. CVWD shall submit its design drawings to Caltrans for confirmation that work within the State's right-of-way complies with Caltrans standards. CVWD shall implement any conditions of approval and requirements of the encroachment permit as determined by Caltrans' District 5 Permits office.
- **Post-Construction Restoration:** CVWD shall restore areas disturbed by construction to pre-construction conditions, such as replanting vegetation cleared for construction activities or patching/repaving roadways where open trenching was used for pipeline construction.

2.4 Permits and Discretionary Approvals

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

Table 2-2: Permits and Approvals

Agency	Type of Approval
Federal	
U.S. Environmental Protection Agency	Maintains inventory for Underground Injection Program
U.S. Fish and Wildlife Service (USFWS)	Federal Endangered Species Act (FESA) consultation for sensitive species (potential)
State	
State Water Resources Control Board – Department of Drinking Water	Review and approval of Engineering Report; Recommendations to Central Coast Regional Water Quality Control Board for Waste Discharge

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

3. EVALUATION OF ENVIRONMENTAL IMPACTS

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

3.1 Aesthetics

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

3.1-1) Have a substantial adverse effect on a scenic vista

Approved Project

As described in the EIR, monitoring wells and pipelines would be constructed underground and the surface restored to its pre-construction conditions, as would areas of temporary disturbance. Underground facilities would not impact surrounding views or scenic resources. Those injection wells being constructed above-grade with wellhead facilities, electrical service, and backflush tank (at one of the well sites) would be placed in screened cages or behind fences or vegetation. Above-grade injection wells would have the potential to impact surrounding views or scenic resources. AWPF improvements would be consistent with the existing visual character and views of the WWTP site, and would be impeded by existing structures and vegetation. There would be no potential impacts to scenic vistas from the AWPF component of the Project. Visibility of the wells and associated infrastructure from adjoining public spaces, particularly those in parks with scenic views of the eastern hills, is considered a potentially significant impact. **Mitigation Measure MM 3.1-1** requires CVWD to test out tank sizing and minimize the size of the final backflush tank, install vegetation screening, and limit lighting to low intensity and shielded options in compliance with City of Carpinteria Policy CD-13b.

The EIR found that the Approved Project would not substantially adversely impact local scenic vistas of surrounding foothills and mountains, and impacts would be less than significant with associated mitigation incorporated.

Modified Project

The Modified Project would revise underground components of the Approved Project, including changes to monitoring well locations, installation of injection wells in underground vaults, modifications to the piping of the AWPF treatment train, and installation of the equalization tank belowground at the AWPF. It would also increase the

overall height of the structure at the AWPF. The backflush tank would be eliminated under the Modified Project, with backflush water instead being stored in 48-inch underground piping, eliminating visual impacts of the tank. There would still be some aboveground facilities associated with the injection wells, as shown in Figure 2-1 and Figure 2-2. Disturbed areas would be restored to pre-construction conditions resulting in no new visual impacts from underground components. Although the height of the structures at the AWPF would increase from 20 feet to 30 feet, the AWPF would remain within the existing 30-foot height limit per City of Carpinteria ordinance. The AWPF is located adjacent to Carpinteria Creek, which provides a scenic corridor or vista, however the AWPF structures in the Modified Project would remain consistent with the character of the structures in the Approved Project, and the existing screening along the property would still remain. Because the Modified Project would be located in the same areas as the Approved Project, and have similar facilities, it would have similar potential to impact scenic views, though the backflush tank would no longer be constructed. As such approved **Mitigation Measure MM 3.1-1** would no longer be required. Therefore, there would be no new impact as a result of the Modified Project and no new mitigation would be required.

3.1-3) In non-urbanized areas, potential to substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the Project is in an urbanized area, would the Project conflict with applicable zoning and other regulations governing scenic quality

Approved Project

The EIR found that all permanent Approved Project structures would be designed to be consistent with the existing visual character of the surrounding area and consistent with the objectives and policies identified in the City's *General Plan/Local Coastal Land Use Plan* and the Creeks Preservation Program. The Approved Project would comply with all applicable regulations that govern scenic quality, including the 30-foot height restriction by City ordinance. Construction activities may impact scenic resources as a result of large construction equipment, temporary fencing at construction sites, and site clearing and excavation activities. Due to the temporary nature of construction activities, however, visual impacts are considered less than significant. Vegetation screening for aboveground injection wells would be required and **Mitigation Measure MM 3.1-1** (requiring screening, limiting lighting, and minimizing the size of the backflush tank) would be implemented to reduce potential visual impacts to less than significant. Impacts from the Approved Project were found to be less than significant with the incorporation of mitigation measures.

Modified Project

The Modified Project would increase the height of structures at the AWPF from 20 feet to 30 feet. The structures would be within the 30-foot height limit of the site, and designed to be consistent with the existing visual character of the WWTP site (see **Figure 3-1**). The height increase would not represent a substantial change in the visual character of the AWPF components from the Approved Project. The backflush tank would be eliminated

and backflush instead stored and conveyed in 48-inch underground piping, eliminating the potential for visual impacts from the backflush tank. Aboveground components of the injection wells would be screened from view with vegetation and/or fencing. As a result, there would be no visual impacts from the injection wells and **Mitigation Measure MM 3.1-1** would no longer apply. Therefore, there would be no new impact as a result of the Modified Project and no new mitigation would be required.

Figure 3-1: Visual Rendering of AWPF Structures in Modified Project

3.1-4) Potential to create a new source of substantial light or glare which would adversely affect day or nighttime views in the area

Approved Project

The EIR found that most construction activities for the Approved Project would occur during the day and would not require nighttime work. Should nighttime work be necessary at any point, CVWD and CSD would obtain permits for any nighttime construction, and nighttime construction would be limited to well drilling activities. During operation, truck trips, deliveries, and maintenance activities would be avoided during nighttime hours , except in the case of emergencies or where avoidance of nighttime hours is infeasible.

New sources of light or glare associated with the Project would be installed around the new equipment at the AWPF and would be similar to and in proximity to existing light sources at the WWTP site. New light sources at the injection wells would typically remain off and would only be used if a problem occurs at night and light is needed to address the issue. **Mitigation Measure MM 3.1-4** and requires nighttime lighting to be of low intensity, directed downward, shielded, and directed away from sensitive habitats, receptors, and residential areas. Additionally, **Mitigation Measure MM 3.1-1** requires low intensity and

shielded lighting, for those situations where safety lighting at the well sites is necessary. Implementation of these mitigation measures would ensure that operational lighting at the well sites and AWPF would have a less than significant impact on adjacent residences. All new light sources associated with the AWPF, injection wells, and backflush tank would comply with applicable City policies and regulations to minimize light and glare, including *General Plan/Local Coastal Land Use Plan Policy* CD-13b and *Creeks Preservation Program Policy* 2.4. Impacts from the Approved Project were found to be less than significant with the incorporation of mitigation measures.

Modified Project

The Modified Project would include the same or similar construction methods as those outlined in the Approved Project, but would not require the above-ground backwash tank. Therefore mitigation for tank size and tank screening would not be needed. All nighttime and operational lighting would incorporate **Mitigation Measure MM 3.1-4**, which was previously adopted in the EIR, and be shielded and directed downward to minimize impacts on neighboring properties. With incorporation of the previously adopted Mitigation Measures from the EIR, impacts would remain less than significant. Therefore, no new impact would occur as a result of the Modified Project and no new mitigation would be required.

Mitigation Measures:

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

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

3.2 Agriculture and Forestry Resources

As explained in *Section 1.4 Evaluation of Environmental Impacts*, all topics under Agriculture and Forestry Resources were found to have No Impact or Less than Significant Impact in the EIR, and the finding would not change under the Modified Project. The new proposed locations for the injection wells in the roadway ROW and the additional locations for the monitoring wells would not be located within designated Farmland or agricultural land. Therefore, potential impacts under Agriculture and Forestry

Resources would remain less than significant under the Modified Project. There would be no new impacts as a result of the Modified Project and no new mitigation would be required.

Mitigation Measures
None required or recommended.

3.3 Air Quality

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

The Modified Project would result in less overall excavation included in the air quality modeling conducted for the Approved Project, resulting in 15 percent fewer soil hauling truck trips compared to the Approved Project. All other assumptions used for the air quality analysis conducted via CalEEMod would remain the same because the Modified Project would use the same or similar construction methods, there are no additional monitoring or injection wells, and there are no substantial changes to the length of pipeline to construct. Because fewer haul trips would be required, and all other assumptions related to air quality would remain the same or substantially similar, the Modified Project would have a lower overall potential to impact air quality compared to the Approved Project as evaluated in the EIR. Therefore, would be no new impacts as a result of the Modified Project and no new mitigation would be required.

Mitigation Measures
None required or recommended.

3.4 Biological Resources

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

3.4-1) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or USFWS

Approved Project

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

- Monarch (Moderate)

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

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

Modified Project

While there are locations in the Modified Project which were not originally identified as potential injection well locations in the Approved Project, these locations – on Linden Avenue and Meadow View Lane – were surveyed as part of the Approved Project's APE for pipe laydown and water conveyance. The potential monitoring well location in the St. Joseph's Church parcel was additionally surveyed for the Approved Project as a potential injection well site. Similarly, the additional monitoring well locations along Meadow View Lane and Well Sites #2 and Well Site #3 were surveyed under the Approved Project's APE, as part of the pipeline alignment and injection well locations. The AWPF location has additionally undergone surveying sufficient to encompass changes in the Modified Project. All locations containing Modified Project elements have therefore been surveyed. Mitigation measures **MM 3.4-1a**, **MM 3.4-1b**, and **MM 3.4-1c** would apply equally to the Modified Project, therefore, no new impact would occur, and no new mitigation would be required.

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

Approved Project

The Approved Project would use an open cut trench method along Olive Avenue, which is a developed public ROW, for a portion of the primary pipeline alignment. Open cut trenching and/or construction materials (e.g., stockpiled materials, construction equipment, and trash) have the potential to result in potentially significant indirect impacts to the arroyo willow thicket located in this area. The arroyo willow thicket meets the criteria for classification of an environmentally sensitive habitat area (ESHA), a coastal zone wetland, and a CDFW sensitive natural community. **Mitigation Measure MM 3.4-1a** requires worker environmental awareness training, while **Mitigation Measure MM 3.4-3c** includes construction best management practices (BMPs) to minimize runoff and conveyance of pollutants into creeks. Compliance with other regulatory guidance and

permits, such as erosion control and water quality BMPs in the General Construction Permit SWPPP, would also serve to protect riparian habitats and species. In addition, hazardous materials containment and spill response requirements in **Mitigation Measure MM 3.10-1b** would help to reduce potential construction-related impacts to riparian and sensitive communities by reducing the potential for pollutants to enter these habitats. With implementation of **Mitigation Measures MM 3.4-1a**, and **MM 3.4-2**, which will require training of workers to identify and avoid sensitive habitat and use temporary fencing to delineate and avoid sensitive habitat areas, potential indirect impacts to the arroyo willow thicket would be reduced to a less than significant level.

Modified Project

The additional areas for the injection and monitoring wells for the Modified Project do not contain riparian habitat or other sensitive natural communities. The Modified Project would include pipeline along Olive Avenue, consistent with the Approved Project, and include the same or substantially similar construction methods, resulting in similar potential impacts to riparian habitat or sensitive natural community. Staging and soundwalls may be located within 50 feet of the embankment for Franklin Creek, but would remain on existing paved surfaces. As noted in the EIR, the County's Coastal Land Use Plan's Policy 9-37 requires a minimum buffer of 50 feet for urban creeks, but allows for the buffer to be adjusted upwards or downwards on a case-by-case basis following consultation with Department of Fish and Game (now Fish and Wildlife) and the Regional Water Quality Control Board to ensure protection of stream and water quality. The Modified Project is pursuing a Coastal Development Permit, which includes requirements to protect stream water quality. The Coastal Development Permit will include the staging and soundwalls within 50 feet of the Creek. With compliance with the permit, the Modified Project there would be no significant impacts associated with staging within 50 feet of the creeks. **Mitigation Measure 3.4-3b** has been modified to clarify that staging could occur within 50 feet of a creek if allowed by the applicable permit, such as the Coastal Development Permit.

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

3.4-3) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means

Approved Project

Impacts to Carpinteria Creek would not occur under the Approved Project. However, if Well Site #6 is selected for construction, there would be limited potential for impacts to Franklin Creek during construction of the creek crossing. Project-related direct impacts to

Franklin Creek would be less than significant due to selection of trenchless or pipe bridge construction methods. Indirect impacts from construction materials (e.g., stockpiled materials, construction equipment, and trash) that may be stored onsite could adversely affect water quality (e.g., increased turbidity, altered pH, decreased dissolved oxygen levels, etc.) within the jurisdictional waters if runoff were to occur during storm events and BMPs were not implemented. Therefore, **Mitigation Measures MM 3.4-3a** (Disturbance Area and Staging), **MM 3.4-3b** (Material Storage), and **MM 3.4-3c** (Construction Best Management Practices) shall be implemented within 50 feet of Franklin Creek and Carpinteria Creek to avoid potential indirect impacts to water quality within these jurisdictional features. Indirect impacts from construction techniques could also include release of bentonite drilling fluid into the channel during HDD operation. Implementation of **Mitigation Measure MM 3.11-1a** would require preparation of a *Frac-Out Prevention and Contingency Plan* to ensure protection of aquatic resources. With implementation of these mitigation measures (and adherence to agency permits and existing regulations), potential indirect impacts to creeks would be reduced to a less than significant level.

Modified Project

The Modified Project would include increased excavation at the AWPF site which has the potential to increase the amount of material/spoils associated with excavation at the WWTP site, though overall excavation for the entire Modified Project would be less than the Approved Project due to a shorter overall pipeline than assumed in the EIR (5,730 LF compared to maximum 8,700 LF in the Approved Project), one fewer injection well, and three fewer monitoring well clusters, and other adjustments with project design. Additionally, the EIR used a conservative approach to excavation assumptions for purposes of the environmental analysis, while the Modified Project uses refined excavation information based on the advancement of the project design from 2019 to 2024. Construction at the AWPF would remain outside the 50-foot buffer from Carpinteria Creek and within the existing walled WWTP site. Staging would be located within 50 feet of Carpinteria Creek, but within the paved and walled AWPF site. All onsite drainage at the AWPF site is captured and returned to the treatment facility headworks through the existing stormwater pump station at the site. As a result, any potential spills or runoff from the staging area or construction activities at the AWPF site would remain onsite. Therefore the Modified Project is not expected to impact Carpinteria Creek. The Modified Project would eliminate the Franklin Creek crossing, thereby eliminating the need for HDD and reducing the potential impacts to Franklin Creek. However, the Modified Project would expand the monitoring well locations to include Meadow View Lane, with sound walls and staging potentially within 50 feet of Franklin Creek embankment. Staging or soundwalls would be located on existing, paved areas. The monitoring well wellhead will be located approximately 60 feet from the Franklin Creek embankment. Therefore, the existing **Mitigation Measures MM 3.4-3a**, **MM 3.4-3b**, and **MM 3.4-3c**, which includes construction BMPs shall also apply to the Modified Project to reduce potential impacts to less than significant, though **Mitigation Measure MM 3.11-1a** (Frac-Out Plan) would not apply. **Mitigation Measure MM 3.4-3b** has been modified to clarify that the 50-foot buffer around the creek applied unless otherwise approved by applicable permits. The remaining Modified Project locations and elements do not have the potential to impact

state or federally protected wetlands. Therefore, no new impacts would be expected and no new mitigation would be required.

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

Approved Project

As described in the EIR, the Carpinteria *General Plan/Local Coastal Land Use Plan* Policy OSC-8 Protect and Conserve Monarch Butterfly Tree Habitat requires new development in or adjacent to habitat used by special status species to be set back sufficiently far as to minimize impacts to the habitat area. For parcels adjacent to Carpinteria Creek, a setback of 300 feet from nesting and roosting trees used by sensitive, rare, threatened, or endangered raptors is required, and **Mitigation Measure 3.4-1b** would require pre-construction nesting bird surveys to further help avoid impacts. Setbacks may be reduced by a qualified biologist based on the results of pre-construction surveys. The policy also protects trees supporting monarch butterfly populations. Suitable roosting habitat and trees are within the project area, but **Mitigation Measures MM 3.4-1a** and **MM 3.4-1c** would train workers to avoid sensitive species and habitats. The *Carpinteria General Plan/Local Coastal Land Use Plan*'s Policy OSC-6, *Preserve the Natural Environmental Qualities of Creekways and Protect Riparian Habitat*, and Santa Barbara County *Coastal Land Use Plan* Ordinance Section 35-97.19, *Development Standards for Stream Habitats* supports the preservation of creeks and their corridors. A minimum setback of 50 feet is required around all streams, including Carpinteria Creek, for development. The Approved Project would not construct permanent AWPF facilities within this 50-foot setback. Any potential direct impacts from the project within 50 feet of areas subject to Policy OSC-6 would be temporary in nature, and **Mitigation Measures MM 3.4-1a, MM 3.4-2, MM 3.4-3a, MM 3.4-3b,** and **MM 3.4-3c** would reduce impacts to Franklin Creek and arroyo willow thicket. Trees meeting the City (including City landmarks) and County tree protection standards, and relevant to the City's *General Plan/Local Coastal Land Use Plan*'s policies OSC-7 and OSC-8, were observed throughout the Biological Resources APE, some of which are located along the roadway ROW. **Mitigation Measure MM 3.4-5** would reduce potential impacts to protected trees by restricting activities within 20 feet of the canopy drip line for protected trees, and coordination with a certified arborist to minimize potential impacts to protected trees where work occurs within 20 feet of the canopy drip line, as permitted. Impacts would be less than significant with implementation of mitigation measures.

Modified Project

The Modified Project would be completed in the roadway ROWs and the WWTP site, within the biological APE evaluated in the EIR for the Approved Project. It would not move permanent facilities within the required buffers identified in the EIR, nor would it move permanent facilities closer to known sensitive habitats or species. The Modified Project would include staging within 50 feet of Carpinteria Creek at the AWPF site, and within 50 feet of Franklin Creek near the Meadowview Well site, but would remain within existing paved areas. The City's Policy OSC-6 only applies to development, and would not apply

to the staging or soundwalls. Additionally, the County's Policy 9-37 allows the 50-foot buffer around urban creeks to be adjusted downward on a case-by-case basis. Because the Modified Project would be subject to a Coastal Development Permit, which would prohibit impacts to the creeks, the proposed staging within the 50-foot buffer, coupled with compliance with the environmental commitments and **Mitigation Measure MM 3.4-3c**, Construction BMPs, would have less than significant impacts.

Potential impacts to biological species would be similar to the Approved Project because the Modified Project would be completed in the same vicinity and using the same or similar construction methods as the Approved Project. **Mitigation Measures MM 3.4-1a** (Worker Environmental Awareness Program) , **MM 3.4-1b** (Nesting Bird Surveys), **MM 3.4-1c** (Avoidance of Monarch Butterfly Winter Roost Sites), **MM 3.4-2** (Sensitive Habitat Fencing), **MM 3.4-3a** (Disturbance Area and Staging)**, MM 3.4-3b** (Material Storage)**, MM 3.4-3c** (Construction Best Management Practices)**, and MM 3.4-5** (Tree Protection Zone Provisions) shall all apply to the Modified Project and similar to the Approved Project, would reduce impacts to less than significant. Therefore, no new impacts would occur and no new mitigation would be required.

Mitigation Measures:

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

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

  The specifics of this program shall include identification of special status species and habitats, a description of the regulatory status and general ecological characteristics of special status resources, and review of the limits of construction and measures required to avoid and minimize impacts to biological resources within the work area. Training for workers who will be involved with the ocean outfall improvements will also include vessel-based monitoring training for identification of marine mammals. A fact sheet conveying this information shall also be prepared for distribution to all contractors, their employees, and other personnel involved with construction of the Proposed Project. All employees shall sign a form provided by the trainer documenting they have attended the WEAP and

understand the information presented to them. The crew foreman shall be responsible for ensuring crew members adhere to the guidelines and restrictions designed to avoid impacts to special status species. If new construction personnel are added to the project, the crew foreman shall ensure that the new personnel receive the WEAP training before starting work. The subsequent training of personnel can include videotape of the initial training and/or the use of written materials rather than in-person training by a biologist.

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

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

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

  1. Prohibit land clearing activities during the monarch wintering season (October 1 through March 1); or,

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

  If Option 2 is selected, surveys (described below) shall be conducted to identify

any monarch roosts in the area proposed for disturbance. Monarch roosts shall be avoided during the wintering season by establishing a 50-foot buffer between land clearing activity and the roost.

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

- **Mitigation Measure MM 3.4-2 Sensitive Habitat Fencing.** Prior to project mobilization, where the project is adjacent to native habitat (i.e., ESHA, riparian habitat, wetland, sensitive natural communities), a certified biologist would identify native habitat to avoid, and temporary construction fencing shall be erected by the contractor at the edge of the temporary construction easement to avoid impacts to the habitat throughout the duration of construction.

- **MM 3.4-3a Disturbance Area and Staging.** Areas of temporary disturbance shall be minimized to the extent practicable. Staging and laydown areas shall be limited to sites unvegetated, previously disturbed (e.g., ROWs, parking lots), and community parks (areas consisting of ruderal vegetation, ornamental landscaping, and outside of the Tree Protection Zone [TPZ; dripline plus 6 feet] of protected trees).

- **MM 3.4-3b Material Storage.** Construction materials for pipelines, injection wells, monitoring wells, and backflush tank, shall be stored on impervious surfaces or plastic ground covers to prevent any spills or leakage. Material storage shall be at least 50 feet from Franklin Creek, Carpinteria Creek, and Carpinteria State Beach, unless otherwise allowed by applicable permits. Any material/spoils from project activities shall be located and stored 50 feet from potential jurisdictional areas (Franklin Creek, Carpinteria Creek, and Carpinteria State Beach) unless otherwise allowed by applicable permits. Construction materials and spoils shall be protected from stormwater runoff using temporary perimeter sediment barriers such as berms, silt fences, fiber rolls, covers, sand/gravel bags, and straw bale barriers, as appropriate.

- **MM 3.4-3c Construction Best Management Practices.** To avoid and/or minimize potential indirect impacts to jurisdictional waters and water quality, the following BMPs shall be implemented within 50 feet of Franklin Creek and Carpinteria Creek:

  a) Prevent the off-site tracking of loose construction and landscape materials by implementing street sweeping, vacuuming, and rumble plates, as appropriate.

b) Prevent the discharge of silt or pollutants off of the site when working adjacent to potentially jurisdictional waters. Install BMPs (i.e., silt barriers, sandbags, straw bales) as appropriate.

c) Work adjacent to Franklin and Carpinteria Creeks shall ensure no wash water enters the receiving water bodies, through measures that may include locating site washout areas at least 50 feet from a storm drain, open ditch or surface water or implementation of barriers to control runoff, such that runoff flows from such activities do not enter receiving water bodies.

d) All vehicles and equipment shall be in good working condition and free of leaks. The contractor shall prevent oil, petroleum products, or any other pollutants from contaminating the soil or entering a watercourse (dry or otherwise). When vehicles or equipment are stationary, mats or drip pans shall be placed below vehicles to contain fluid leaks.

e) All re-fueling, cleaning, and maintenance of equipment will occur at least 50 feet from potentially jurisdictional waters (Franklin Creek, Carpinteria Creek, and the roadside storm water drain).

f) Any spillage of material will be stopped if it can be done safely. The contaminated area will be cleaned, and any contaminated materials properly disposed. For all spills, the project foreman or other designated liaison will notify CVWD immediately.

g) Adequate spill prevention and response equipment shall be maintained on site and readily available to implement to ensure minimal impacts to the aquatic and marine environments.

- **Mitigation Measure MM 3.4-5 Tree Protection Zone Restrictions**. Components of the project footprint that occur within 20 feet of the canopy drip line of protected trees shall be subject to the following:

  a. No ground disturbance, grading, trenching, construction activities or structural development shall occur within the tree protection zone (TPZ; dripline plus 6 feet).
  b. No equipment, soil, or construction materials shall be placed within the TPZ. No oil, gasoline, chemicals, paints, solvents, or other damaging materials may be deposited within the TPZ or in drainage channels, swales or areas that may lead to the TPZ.
  c. If work within the TPZ cannot be avoided, a qualified arborist shall monitor all activities within the TPZ of protected trees.
  d. Unless otherwise directed by the arborist, all work within the TPZ, including brush clearance, digging, trenching and planting, shall be done with hand tools or small hand-held power tools that are of a depth and design that will not cause root damage.
  e. Where trenching or digging within the TPZ is specifically permitted, the work shall be conducted in a manner that minimizes root damage, as directed by an

arborist.

f. Grade changes outside of the TPZ shall not significantly alter drainage to protected trees. Grading within the TPZ shall use methods that minimize root damage and ensure that roots are not cut off from air. Where erosion may be a factor return and protect the original grade or otherwise stabilize the soil.
g. Protected trees shall not be used for posting signs, electrical wires or pulleys; for supporting structures; and shall be kept free of nails, screws, rope, wires, stakes and other unauthorized fastening devices or attachments.

3.5 Marine Biological Resources

The Approved Project includes modifications to the ocean outfall, and required mitigation associated with construction activities for the ocean outfall. However, no changes to the ocean outfall are proposed under the Modified Project and in fact, the ocean outfall improvements were already completed prior to this Addendum. Additionally, the Modified Project would not increase the volume or concentrations of discharges from the AWPF compared to the Approved Project. Therefore, the Modified Project would have no changes from the Approved Project related to the project elements that would have had potential impacts on Marine Biological Resources. As a result, additional analysis of potential impacts to Marine Biological Resources is not needed for the Modified Project. Therefore, no new impact would occur as a result of the Modified Project and no new mitigation would be required.

Mitigation Measures:

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

3.6 Cultural Resources

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

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

Approved Project

The Cultural Resources Assessment, included as Appendix E to the EIR, indicates CHRIS-CCIC records search found one prehistoric archaeological site, CA-SBA-7, mapped within the 0.5 mile radius cultural resources Study Area, specifically at the WWTP site along Carpinteria Creek. However, review of previous records and

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

Modified Project

The Modified Project would be constructed within the Cultural Resources Assessment's 0.5 mile radius around the Study Area. Therefore, the findings of the Cultural Resources Assessment conducted for the Approved Project would also apply to the Modified Project in its entirety. The CA-SBA-7 site would therefore remain the only known cultural resources site within the Study Area of the Modified Project. New or additional facilities of the Modified Project would not be in closer proximity to the vicinity of CA-SBA-7, but would continue to include construction activities at the WWTP site and directly adjacent pipelines. The Modified Project would have the same potential impact as the Approved Project. As such, **Mitigation Measures MM 3.6-2a** (Archaeological and Native American Monitoring) and **MM 3.6-2b** (Unanticipated Discovery of Cultural Resources) would be required to reduce impacts to less than significant. No new impacts would occur and no new mitigation would be required.

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

Approved Project

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

Modified Project

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

Mitigation Measures

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

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

- **Mitigation Measure MM 3.6-2b Unanticipated Discovery of Cultural Resources.** If cultural resources are encountered during ground-disturbing activities, work in the immediate area must halt and an archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for archaeology (National Park Service 1983) shall be contacted immediately to evaluate the find. If the discovery proves to be significant under the NHPA

and/or CEQA, additional work such as data recovery excavation and Native American consultation shall occur, as necessary, to mitigate any significant impacts or adverse effects.

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

3.7 Energy

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

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

Mitigation Measures

None required or recommended.

3.8 Geology and Soils

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

3.8-1) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

ii) Strong seismic ground shaking?

iii) Seismic-related ground failure, including liquefaction?

Approved Project

As described in the EIR, Southern California is known to be seismically active. The Study Area does not lie within an Alquist-Priolo fault rupture zone as delineated by the California Geological Survey. The Carpinteria Fault and Rincon Creek Fault trend toward the southwest end of the Study Area, and are both inactive, concealed faults, though the City considers the faults to be potentially active for planning purposes. Two additional potentially active faults are located within two miles of the Study Area to the north-northeast. Although the Approved Project would be designed in compliance with applicable standards and codes to protect against impacts of seismic ground shaking, **Mitigation Measure MM 3.8-1** (Geotechnical Analysis) has been included to further reduce seismic impacts to less than significant.

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

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

Modified Project

The Modified Project would be subject to the same risk of structural damage or loss due to seismic ground shaking as the Approved Project because the Modified Project would be located within the same fault zone area. The Modified Project facilities would also be constructed using the same standards and guidelines as those in the Approved Project. As with the Approved Project, **Mitigation Measure MM 3.8-1** would apply, which requires preparation of a soils and geotechnical report for the facilities proposed under the Modified Project, which would determine whether there is a liquefaction risk and recommendations for materials and design would be incorporated into the specifications. Therefore, no new impact related to seismic ground shaking, ground failure or liquefaction, or landslides or soil instability would occur from the Modified Project, and no new mitigation would be required.

3.8-3) Be located on geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse

Approved Project

The City's *General Plan/Local Coastal Land Use Plan* and *Santa Barbara County Comprehensive Plan* indicates that the Study Area is susceptible to liquefaction. The Approved Project is in a generally level area and is not anticipated to destabilize soils that would result in landslides. Potential impacts from lateral spreading, subsidence, liquefaction, or expansive soils would be reduced through implementation of applicable design and construction standards and further mitigated by **Mitigation Measure MM 3.8-1** (Geotechnical Analysis), which requires soils testing/surveys and protective measures in areas with liquefaction potential or expansive soils, thereby reducing impacts to less than significant.

Modified Project

Because the Modified Project would be within the same area as the Approved Project, Modified Project facilities would also be located in areas susceptible to liquefaction. As with the Approved Project, the Modified Project, would occur on generally level soils, and potential impacts would be mitigated under those measures established in the Approved Project (**Mitigation Measure MM 3.8-1**). Therefore, no new impact would occur from the Modified Project and no new mitigation would be required.

3.8-4) Be located on expansive soil, as defined in Table 18 1 B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property

Approved Project

The EIR determined that a portion of the Study Area is in high expansive soils. There is potential for these soils to create a risk to Approved Project components, such as damage to a conveyance pipeline. In the event that one of the pipelines is damaged due to the expansive soils, there is potential risk to property from flooding associated with a broken pipeline. This risk would be reduced through implementation of applicable design and construction standards, but could be potentially significant and require mitigation. **Mitigation Measure MM 3.8-1** (Geotechnical Analysis) requires soils testing/surveys and protective measures in areas with liquefaction potential or expansive soils, thereby reducing impacts to less than significant. Therefore, the impact would be less than significant with mitigation incorporated.

Modified Project

The Modified Project area is in the same vicinity as the Approved Project area; the portion of the Study Area identified in the EIR to contain expansive soils thus remains for the Modified Project, and the Modified Project would be subject to the same mitigation measures as the Approved Project as described in the EIR. The geotechnical report that would be completed as part of **Mitigation Measure MM 3.8-1** would identify expansive

soils and provide design specifications to avoid potential damage to the Modified Project facilities, reducing potential impacts to less than significant. Therefore, no new impacts associated with expansive soils would occur for the Modified Project and no new mitigation measures would be required.

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

Approved Project

The EIR found that there is low paleontological sensitivity in the Approved Project area between 0 and 15 feet bgs due to the young age of the soils at these depths at the project site. Impacts on paleontological resources at these depths would therefore not be expected. Excavation for the Approved Project's conveyance pipelines, backflush tank, and backflush pipelines would all remain above the 15-foot threshold, and therefore would have no impact on paleontological resources. Likewise, the ocean outfall modifications would not involve excavation and would similarly have no impact on paleontological resources.

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

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

Modified Project

The Modified Project sites are all located in urbanized, previously developed or disturbed land. The Modified Project sites are located in proximity to the Approved Project sites and would use the same or substantially similar construction methods as those of the Approved Project. Excavation activities at the AWPF would be to similar depths as those of the Approved Project, though over a modified total footprint, and would similarly exceed 15 feet bgs. However, the previous excavation activities at the WWTP site have disturbed the sediments to an estimated depth of 21 feet bgs, including in areas where the Modified Project's AWPF components would be constructed, similar to the Approved Project. As a result, the Modified Project would have the same potential risk for encountering fossiliferous deposits during anticipated ground disturbance and well drilling. The

Modified Project would implement previously adopted **Mitigation Measure MM 3.8-6** in the event of unanticipated fossil discovery, and therefore potential impacts would be less than significant. No new paleontological resource impacts would occur with the Modified Project and no new mitigation would be required.

Mitigation Measures:

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

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

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

3.9 Greenhouse Gas Emissions

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

The Modified Project would result in less overall excavation than the Approved Project. This results in approximately 15 percent fewer hauling trips. All other assumptions used for the greenhouse gas emissions analysis conducted via CalEEMod would remain the same because the Modified Project would use the same or similar construction methods and there are no substantial changes to the length of pipeline to construct. Because fewer haul trips would be required, and all other assumptions related to air quality would remain the same or substantially similar, the Modified Project would have a lower overall potential for impacts associated with greenhouse gas emissions compared to the Approved Project as evaluated in the EIR. Therefore, there would be no new greenhouse gas emission impacts as a result of the Modified Project and no new mitigation would be required.

Mitigation Measures
None required or recommended.

3.10 Hazards and Hazardous Materials

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

3.10-1) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials

Approved Project

During construction, construction machinery and associated chemicals (e.g. gasoline, diesel fuel, hydraulic fluids, paint) would be required. During operation, chemicals would be routinely used, stored, and delivered for the treatment/blending facility (e.g. cleaning and degreasing solvents, sodium hypochlorite, ammonium hydroxide, antiscalant, etc.). The EIR found the routine use of hazardous materials during construction and operation of the Approved Project would be minimized through compliance with existing federal, State and local regulations, which were identified in the EIR. To further minimize potential impacts of hazards and hazardous materials transported, used, or disposed of for the project, **Mitigation Measures MM 3.10-1a** (Preparation of Hazardous Materials Business Plan) and **MM 3.10-1b** (Hazardous Materials Management and Spill Prevention and Control Plan) would be implemented, which require the amendment of existing, and creation of additional, plans for hazardous materials onsite for the AWPF and construction phase, consecutively. With conformance to appropriate regulations, BMPs, and mitigation measures, the EIR found impacts related to hazards and hazardous materials would be less than significant.

Modified Project

Under the Modified Project, the use of construction machinery and chemicals during construction would be the same as for the Approved Project because the same or substantially similar construction methods would be used. The additional well locations

would not substantially change routine use of hazardous materials during construction. CVWD would be required to be in compliance with all applicable federal, State, and local regulations pertaining to hazardous materials and would use appropriate BMPs in addition to implementing **Mitigation Measures MM 3.10-1a** and **MM 3.10-1b**, and impacts would be less than significant. Therefore, no new impacts would occur for the Modified Project related to routine transport, use, or disposal of hazardous materials and no new mitigation would be needed.

3.10-2) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment

Approved Project

Construction of the Approved Project would temporarily increase the routine transport and use of hazardous materials commonly used in construction activities. Therefore, the Approved Project has the potential to result in release of hazardous materials through reasonably foreseeable upset or accident conditions during both construction and operation of the Approved Project. The Approved Project would be in compliance with applicable policies and regulations, follow appropriate BMPs, and implement **Mitigation Measure MM 3.10-1b**, which would require the preparation of a Hazardous Materials Management and Spill Prevention and Control Plan establishing procedures for preventing construction-related accidents and handling potential accidents. With implementation of **Mitigation Measure MM 3.10-1b**, impacts from potential accidental release of hazardous materials to the public or the environment would be reduced to less than significant.

Modified Project

Similar to the Approved Project, the Modified Project would include the routine transportation and use of hazardous materials for both construction and operation, and would have a similar potential to result in release of hazardous materials through reasonably foreseeable upset or accident conditions during both construction and operation. The Modified Project shall implement **Mitigation Measure MM 3.10-1b**, which was previously adopted as part of the EIR, to minimize the risk of hazardous material exposure during construction. The Modified Project would require the development of each preventative plans that would apply to the Approved Project and comply with the same existing regulations. During operation, the same safety measures would be put in place. Therefore, no new impact would occur, and no new mitigation would be necessary.

3.10-3) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school

Approved Project

The EIR found there are six public elementary, middle, and high schools located within the Study Area, and three pre-schools. As shown in Table 3.10-1 and Figure 3.10-1 of

the EIR, these nine schools are all located within one-quarter mile of the Approved Project. Although construction activities for the Approved Project would be conducted in compliance with all applicable regulations for the transport, storage, use, and disposal of hazardous materials and precautions would be taken to reduce potential risks, there is potential for an accidental release of hazardous materials, as discussed under Impact 3.10-2. Given the proximity of these schools to the Approved Project, there is potential that such an accidental release could occur within one-quarter mile (1,320 feet) of an existing or proposed school. **Mitigation Measures MM 3.10-1a** (Preparation of Hazardous Materials Business Plan) and **MM 3.10-1b** (Hazardous Materials Management and Spill Prevention and Control Plan) shall apply to construction and operation of the Approved Project. These mitigation measures require developing and implementing onsite policies and procedures for minimizing risks associated with accidental release of hazardous materials, including in proximity of existing or proposed schools. Implementation of these mitigation measures would reduce impacts to less than significant.

Modified Project

The Modified Project expands the area in which the monitoring wells and injection wells could potentially be located. The nine schools already described in the EIR remain the only schools within a 0.25 mile radius of the Modified Project area. The Modified Project therefore would not create a new impact. Previously adopted **Mitigation Measures MM 3.10a** and **MM 3.10b** would be implemented as part of the Modified Project, reducing impacts to less than significant. Therefore, there would be no new impacts as a result of the Modified Project and no new mitigation would be required.

3.10-4) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment

Approved Project

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

Modified Project

All expansions to possible monitoring and injection well sites occur on land already accounted for as potential project sites found in the EIR, or immediately adjacent to the Approved Project. No changes would be made to potential Well Site #6 or the Southern Potential Pipeline Alignment along 6th Street at Linden Avenue under the Modified Project. **Mitigation Measure MM 3.10-4** still applies and would be implemented as part of the Modified Project if either or both of these sites are selected as final project locations and would thus reduce potential impacts to less than significant. No other Modified Project facilities would be located on a clean-up site undergoing or awaiting remediation. Therefore, no new impacts would occur as part of the Modified Project and no new mitigation would be required.

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

Approved Project

The EIR determined construction of the Project components would temporarily alter, block, or impair roads such that they would conflict with the adopted emergency response plan and emergency evacuation plan. Coordination with local emergency responders would be required regarding lane closures. Implementation of **Mitigation Measure MM 3.18-1** (Transportation Management Plan) would require preparation of a Transportation Management Plan and would address how the City would communicate with emergency response agencies to develop emergency access strategies. With the implementation of

Mitigation Measure MM 3.18-1, potential impacts would be reduced to less than significant levels. Over the long term, the Approved Project does not have any characteristics that would physically impair or otherwise interfere with emergency response or evacuation in the Study Area. Therefore, with implementation of mitigation measures, impacts would be less than significant.

Modified Project

The Modified Project would increase the duration of road closures along Linden Avenue and Meadow View Lane compared to Approved Project because well drilling would take longer than only installing pipelines in these roadway ROWs. The Modified Project adds potential new locations for monitoring wells, which expands which roadways may be affected by lane closures during monitoring well construction. However, it would not change the overall number of roads that could experience closures. As with the Approved Project, any lane or road closures would temporarily alter, block, or impair roads such that they would conflict with the adopted emergency response plan and emergency evacuation plan. Coordination with local emergency responders would be required regarding lane closures. Similarly, **Mitigation Measure MM 3.18-1** shall be required for the Modified Project. As with the Approved Project, all disturbances associated with the Modified Project would be assessed for potential to interfere with an adopted emergency response or emergency evacuation plan (and with traffic generally). CVWD would be responsible for coordinating with emergency services, creating a Transportation Management Plan, and minimizing the duration of closures to roadways and critical access points for emergency services under the adopted **Mitigation Measure MM 3.18-1**. As with the Approved Project, impacts would be reduced to less than significant with implementation of the described mitigation measure. Therefore, there would be no new impacts, and no further mitigation measures would be required.

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

Approved Project

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

Modified Project

The Modified Project would be located within the Study Area of the Approved Project, and would be subject to the same wildfire related risks as the Approved Project. No part of the Modified Project changes the determinations made in the EIR regarding risk of direct or indirect impact from wildfire as all portions of the project remain in the same localities designated as Low Fire Hazard Zone and debris flow risk areas. The Modified Project would maintain compliance with applicable building and design standards, a wall around the AWPF would remain, and **Mitigation Measure MM 3.10-7** would be implemented as part of the Modified Project reducing potential impacts would be less than significant. Therefore, no new impact would occur, and no new mitigation would be required.

Mitigation Measures:

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

- **MM 3.10-1a Preparation of Hazardous Materials Business Plan.** CSD shall amend its existing Hazardous Materials Business Plan (HMBP) for the WWTP to address the addition of the AWPF and pump station. The HMBP shall include, at a minimum, an updated hazardous materials inventory, site plan, emergency response plan, and requirements for employee training. The HMBP shall be amended prior to the use and storage of chemicals during construction or operation of the Proposed Project. The HMBP shall inform staff and contractors of the chemicals that may be used at the site and how to respond to potential hazardous material emergencies or exposure. CSD shall confirm training and signage included in the HMBP are completed and posted at the AWPF and associated chemical storage. CSD shall confirm that the hazardous materials inventory is consistent with chemicals ordered by contractors during construction and by CSD for operation and maintenance of the AWPF, pump station, and associated facilities.

- **MM 3.10-1b Hazardous Materials Management and Spill Prevention and Control Plan.** Before construction begins, CVWD and/or CSD shall require its construction contractor to prepare a Hazardous Materials Management Spill Prevention and Control Plan that includes a project-specific contingency plan for hazardous materials and waste operations. The Plan will be applicable to construction activities and will establish policies and procedures according to applicable codes and regulations, including but not limited to the California Building and Fire Codes, and federal and California Occupational Safety and Health

Administration (Cal/OSHA) regulations, to minimize risks associated with hazardous materials spills. Elements of the Plan will include, but not be limited to the following:

- A discussion of hazardous materials management, including delineation of hazardous material storage areas, access and egress routes, waterways, emergency assembly areas, and temporary hazardous waste storage areas;
- Notification and documentation of procedures; and
- Spill control and countermeasures, including employee spill prevention/response training.

- **MM 3.10-4 Contingency Plan for Contaminated Soil and/or Groundwater.** If Well Site #6 or the Southern Potential Pipeline Alignment along 6th Street at Linden Avenue are selected as components of the Proposed Project, CVWD shall conduct a Phase I Environmental Site Assessment to evaluate the potential for contaminated soils within the Project footprint. If the Phase I Environmental Site Assessment is positive, CVWD shall conduct soils testing prior to excavation activities in those sites to evaluate the risk of encountering contaminated soils. If soils testing finds contaminated soils or groundwater, construction will be halted in the area and the type and extent of the contamination shall be evaluated. CVWD will develop a contingency plan to dispose of contaminated soils or groundwater through consultation with appropriate regulatory agencies prior to continuation of work. The contingency plan may include, but not be limited to, a plan for safe handling of contaminated soils, a description of the required personal protective equipment for workers during excavation of contaminated soils, and identification of proper disposal sites and methods. CVWD will designate a monitor to confirm compliance with the contingency plan during excavation activities in the contaminated area.

- **MM 3.10-7 Implement Construction Equipment and Staging Area BMPs.** CVWD and CSD contractors shall be required to clear construction staging areas of dried vegetation and other material that could ignite, and store equipment that heats up only in cleared areas. CVWD and CSD contractors shall be required to keep all construction equipment in good working order and equipped with spark arrestors to prevent potential sparks. CVWD and CSD shall require its contractors to use a spotter during welding activities, and fire extinguishers would be made available at all construction sites. Confirmation of these practices will be made by CVWD or CSD staff or their designated representative through periodic site visits.

3.11 Hydrology and Water Quality

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

3.11-1) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality

Approved Project

The EIR found that there was potential for water quality impacts to occur under the Approved Project should HDD be used for the pipeline crossing of Franklin Creek due to the risk of frac-out. If HDD were used, **Mitigation Measure 3.11-1a** (Frac-Out Plan) would be implemented which requires the development of a Frac-Out Plan to reduce potential impacts to Franklin Creek to less than significant. Construction of the Approved Project would comply with the SWRCB's NPDES General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit) (Order 2009-0009-DWQ) which requires preparation and implementation of a SWPPP to control erosion, sediment and other construction-related pollutants in storm water discharges during project construction. Discharges of treated water from the WWTP are covered under the CSD's NPDES permit for the CSD WWTP (Order R3-2017-0032, Permit CA0047364). Compliance with this permit reduces water quality impacts resulting from discharge of recycled water by setting effluent limitations and discharge specifications for the CSD WWTP and requiring CSD to comply with the Monitoring and Reporting Program and to visually inspect the ocean outfall and diffuser structure at least once per year. This permit would be updated to reflect the new CAPP components. Compliance with this permit would ensure potential water quality impacts at the ocean outfall from operation of the AWPF would be less than significant. The post-construction stormwater runoff requirements of the Municipal Separate Storm Sewer System (MS4) permit (Order R3-203-0032) would apply to the injection well sites and work completed at the WWTP site, both of which would exceed the impervious surface thresholds that trigger the policy.

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

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

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

The City's Environmental Compliance Guidelines also consider a water quality impact significant if it would significantly impact biological communities. As discussed in *Section*

3.4, Biological Resources, construction activities could result in potential impacts to water quality in Franklin Creek and Carpinteria Creek, and **Mitigation Measures MM 3.4-3a** (Disturbance Area and Staging)**, MM 3.4-3b** (Material Storage)**, MM 3.4-3c** (Construction Best Management Practices) would be implemented to minimize disturbances that could result in sediments in the creeks, trash entering waterways, and water quality impacts from runoff and spills/leakage. Impacts would be less than significant with mitigation incorporated.

Modified Project

The Modified Project would be constructed using the same or substantially similar construction methods as the Approved Project, be located in similar areas as the Approved Project, would reduce the overall number of injection and monitoring wells, and would have the same operations and maintenance activities as the Approved Project. The Modified Project would generate the same average volume of water as the Approved Project and be operated in the same manner, and would have the same less-than-significant impact on groundwater as the Approved Project. As with the Approved Project, no mitigation would be required related to potential groundwater quality impacts. Under the Modified Project, there would be no changes to ocean outfall elements of the Approved Project, as they have already been completed, and thus no changes in impacts or mitigation.

Potential construction impacts on water quality in Franklin Creek and Carpinteria Creek would be similar to the Approved Project, with the exception of the potential impacts associated with HDD because no pipeline crossing of Franklin Creek would be required under the Modified Project. Therefore, the approved **Mitigation Measures MM 3.4-3a, MM 3.4-3b,** and **MM 3.4-3c** would be required for the Modified Project, but **Mitigation Measure MM 3.11-1** (requiring a Frac-Out Plan) would not. As with the Approved Project, the Modified Project would have a less than significant impact with incorporation of mitigation, though **Mitigation Measure 3.11-1** from the Approved Project would not apply to the Modified Project and the overall potential impacts would be to a lesser degree. Therefore, no new impact would occur, and no new mitigation would be required.

Mitigation Measures:

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

3.12 Land Use and Planning

As explained in in Section 1.4 Evaluation of Environmental Impacts, this analysis only discusses checklist question 3.12-2, because the other topics under Land Use and

Planning were found to be No Impact or Less than Significant Impact in the EIR and the finding would not change under the Modified Project.

3.12-2) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect

Approved Project

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

The conveyance and backflush pipelines would be located underground, and generally within the roadway ROWs and in locations designated for public infrastructure. They would therefore be consistent with applicable land use plans, policies, and regulations of agencies with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect. Easements would be acquired as necessary, and once installed, conveyance and backflush pipelines would not affect aboveground land use, nor would they conflict with applicable land use plans, policies, or regulations.

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

Modified Project

The height of the AWPF would be increased to 30 feet in the Modified Project, which will not result in a violation of the 30-foot maximum height restriction set by the City in areas

zoned for utilities. Similar to the Approved Project, the Modified Project would avoid construction of facilities within the 50-foot creek setback; facilities are designed to remain outside of the 50-foot setback from creeks per City and County policy, though staging and sound walls may be located within the 50-foot buffer. As noted in the City's OSC-6 policy, the set-back applies to development, and the County's Policy 9-37 allows for the buffer to be decreased on a case-by-case basis. Because the staging would be done within existing paved areas, and environmental commitments including compliance with permits (including the General Construction SWPPP requirements and applicable City and County permits) and trash management would be implemented, the Modified Project anticipates receiving approval for a reduced buffer for staging. As with the Approved Project, the Modified Project would additionally obtain a Coastal Development Permit from the City as the entire City is within the Coastal Zone. Therefore, there would be no conflict with any land use plan, policy, or regulation at the AWPF under the Modified Project.

Similar to the Approved Project, the new well sites of the Modified Project would be located within the City on land zoned for utilities, recreation, and public infrastructure, and easements would be acquired as necessary. The new injection well and monitoring well sites would be within the roadway ROW or parcels already evaluated under the Approved Project. Coordination with adjacent landowners would occur as part of the Modified Project, in the same manner as the Approved Project, and disruption of community events and needs would be similarly avoided by timing construction appropriately. No changes to ocean outfall construction would occur under the Modified Project. Because the Modified Project would use the same or substantially similar construction methods as the Approved Project, construction would create temporary noise and transportation impacts that could temporarily interfere with existing land uses, but implementation of approved **Mitigation Measures MM 3.14-1** (Noise Control Measures to Reduce Construction Noise), and **MM 3.18-1** (Transportation Management Plan) would reduce these temporary impacts to less than significant. Therefore, there would be no new impacts as a result of the Modified Project and no new mitigation would be required.

Mitigation Measures:

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

3.13 Mineral Resources

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

Mitigation Measures

None required or recommended.

3.14 Noise

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

3.14-1) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies

Approved Project

The EIR analyzed the potential for temporary noise impacts from construction of the wells, pipelines, and AWPF facility. As discussed in the EIR, most of the well construction, pipeline construction, and AWPF construction would occur during daytime hours as allowable per City noise standards. Twenty-four-hour drilling would be needed for injection wells, however, which would primarily involve the use of a rotary drill rig. Drilling of the injection wells could span up to three weeks of 24-hour construction. The nearest residential receptors could be as close as 25 feet away from the rotary drill rig during 24-hour well construction and would exceed the temporary construction noise standards. Impacts from well drilling would thus be potentially significant before mitigation.

Similar to injection wells, monitoring well construction, which would involve the use of a rotary drill rig, flat-bed trucks, jackhammers, and forklifts, may require 24-hour drilling and may be located within residential roadways, near other residential properties, or near other sensitive receptors. Some equipment likely to be used during construction of the AWPF and associated facilities at the WWTP site would also have short-term noise levels that exceed standards, such as jack hammers or compactors, both of which generate noise levels over 80 dBA at 50 feet.

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

Operational noise from the Approved Project would be generated by the pump station, and equipment at the injection wells and AWPF. The EIR found permanent noise from operation of the wells would be naturally reduced given the facility's location and design as well as distance from noise-sensitive receptors. Operational noise from the pump station at the AWPF would be reduced because it would be completely enclosed within a building as well as further shielded from residences by other buildings on the WWTP site Therefore, operation-related impacts to ambient noise levels would be less than significant.

The Approved Project's pipelines would be underground and are therefore not anticipated to result in significant noise impacts during operation. The only noise generating activity at the injection well sites would be the backflush pumps. The EIR determined the noise from the backflush pumps would be a maximum of 69 dBA Leq due to their location within the underground portion of the injection well vault but noted that noise from the pumps is expected to be imperceptible. Ambient noise levels adjacent to the injection well sites are not expected to substantially increase as a result of project operations. As described above, operational noise levels are not anticipated to create a significant noise impact for neighboring properties and sensitive receptors. The location of noise-generating equipment is such that noise would be attenuated by their enclosures and any slight increase in ambient noise levels would be less than significant.

The ocean outfall modifications would generate noise during construction. However, impacts to marine species were not anticipated, though **Mitigation Measures MM 3.4-1a** (Worker Environmental Awareness Program)**,** discussed in *Section 3.5 Biological Resources*, **MM 3.5-1a** (Avoidance Measures for Marine Mammal and Sea Turtle Species) and **MM 3.5-1b** (Subtidal Biological Survey), discussed in Section 3.6 Marine Biological Resources in the EIR, would reduce any potential impacts, including noise impacts, to marine mammals and sea turtles to less than significant levels by training workers on identification of sensitive species (including marine mammals), requiring avoidance measures for marine mammals and sea turtles, and conducting marine biological surveys prior to construction to identify and where feasible avoid, special status species.

Modified Project

The Modified Project would include the same sources of noise generation as the Approved Project for both construction and operation because the Modified Project would construct the same number of injection and monitoring wells as the Approved Project using the same or substantially similar methods, though injection well construction would take up to four weeks per well instead of three weeks as in the Approved Project. The increase in duration of potential 24-hour drilling would not represent a substantial change from the Modified Project because it would be 2 additional weeks of 24-hour drilling (one additional week per injection well) out of an overall construction schedule of 156 weeks (36 months, or three years), or approximately 1% of the total schedule, and would not change the potential impacts associated with 24-hour drilling. The Modified Project would expand the potential injection and monitoring well locations, including to the roadway

ROW along Linden Avenue and Meadow View Lane for the injection wells. The proposed location on Meadow View Lane would be approximately 50 feet from the nearest residence, while the proposed location on Linden Avenue would be approximately 55 feet from the nearest residence. Because the Modified Project would generate substantial noise during 24-hour drilling of the injection wells, **Mitigation Measure MM 3.14-1** (Noise Control Measures to Reduce Construction Noise) would apply, including offering temporary housing for residents located less than 100 feet from the drilling activities to ensure no residents are exposed to noise levels in excess of 75 dBA CNEL.

Because the Modified Project requires no changes to the ocean outfall improvements that were previously completed, **Mitigation Measures MM 3.4-1a, MM 3.5-1a,** and **MM 3.5-1b** would not be required for the Modified Project in relation to potential noise generation.

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

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

Approved Project

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

Modified Project

The Modified Project would use mainly the same construction equipment as the Approved Project, except it would not include the use of a pile driver or trenchless auger. Because it would use generally the same equipment, it would therefore generate similar vibrations. Although the Modified Project does not require the use of a pile driver , it would use a vibratory roller as well as the remaining equipment identified in the EIR. The Modified Project would move the Meadow View Well closer to residences (approximately 50 feet away), as well as the Linden Injection Well (approximately 55 feet away). However, groundborne vibration attenuates quickly, and none of the equipment used for the construction of injection wells would exceed the threshold for being "disturbing" at 25 feet, and therefore would not be disturbing at 50 or 55 feet. Because vibrations have the

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

Mitigation Measures:

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

- **MM 3.14-1a. Noise Control Measures to Reduce Construction Noise.** In order to comply with the affected City and County Municipal Codes and noise ordinances, CVWD's and CSD's construction contractors shall implement the following measures:

  - Limit Construction Hours: Construction hours shall be limited to times authorized under the City and County Municipal Codes and as allowed by applicable permits. Within For the City of Carpinteria, noise-generating construction will be is limited to the hours of 7:00 a.m. to 8:00 p.m. 5:00 p.m. Monday through Friday, and prohibited on Saturday and Sunday, unless otherwise necessary. 8:00 a.m. to 8:00 p.m. on Saturday, and 10:00 a.m. to 8:00 p.m. on Sunday. Non-noise generating project activities, including but not limited to equipment maintenance, refueling, preparations, and on-site meetings, would not be subject to these time limits unless otherwise specified in applicable permits. After-hours permits may be acquired if determined that it is required and serves the public interest. For the County of Santa Barbara, construction-related noise is restricted between 10:00 p.m. and 7:00 a.m. Sunday through Thursday, and midnight and 7:00 a.m. Friday and Saturday to levels less than 60 dB at the edge of the property line, or those that are not clearly discernable 100 feet from the property line.

  - **After-Hours Construction:** If construction outside of the City and County restricted hours is required, CVWD and CSD shall obtain CUP approval for such activities prior to initiation of construction. For each site requiring after-hours construction within 1,000 feet of residential areas, CVWD or its contractor shall install a temporary sound wall barrier around the site of construction activities. The sound wall barrier shall be 24 feet in nominal height with blanketed wall panels having a minimum sound transmission class rating of 25 to mitigate noise levels to less than 75 dBA CNEL at the property line of the receptor. Sound levels shall be continuously monitored throughout construction activities to ensure adequate noise reduction.

- **Construction at St. Joseph's Church:** Where construction permits allow construction on Sundays, drilling of the injection well at Well Site #3 shall be temporarily halted during Mass on Sundays. Drilling may resume between mass times as determined necessary by the drilling contractor to maintain integrity of the borehole. Sunday Mass times are scheduled at 7:00 a.m., 9:00 a.m., 11:00 a.m., and 5:30 p.m. and last for approximately 1 hour. Construction contractor shall coordinate with St. Joseph's Church staff on specific times drilling will stop and recommence on Sundays to avoid drilling during Sunday Mass. Specific Sunday Mass hours provided by St. Joseph's Church staff shall take precedence over the times listed here.

- **Equipment Location and Shielding:** CVWD and CSD shall require its contractors to locate stationary noise-generating construction equipment such as air compressors and generators as far as possible from homes and businesses within the City of Carpinteria. At the well sites, the contractor shall install a temporary sound barrier between the construction site and potential sensitive receptors such as residential areas or schools during construction to mitigate elevated noise levels. Sound barriers may include sound blankets or sound walls, or other appropriate features. The final selection of noise barriers will be reviewed and approved by CVWD and the City during the CUP approval process.

- **Temporary Housing during After-Hours Construction:** For residences within 100 feet of nighttime drilling where sound attenuation may be unable to reduce noise levels to 75 dBA at the property line, CVWD may temporarily provide alternative housing (e.g., hotel accommodations) for those residents who request such accommodations and whose properties fall within areas where after-hours construction noises cannot feasibly be mitigated to less than 75 dBA

- **Locate Staging Areas away from Sensitive Receptors:** The contractor shall select construction staging areas as far as feasibly possible from sensitive receptors. Prior to construction, the construction contractor shall identify and receive approval of the construction staging areas from the City of Carpinteria Public Works Department via written approval from a City engineer.

- **Install and Maintain Mufflers on Construction Equipment in Excess of 85 dBA:** Construction equipment that generates noise in excess of 85 dBA at 100 feet shall be fitted with mufflers to reduce noise to less than 85 dBA when measured 100 feet from the equipment. CVWD and CSD shall require the contractor to maintain construction equipment with specified noise-muffling devices to achieve stated performance measures. Noise testing shall be required to demonstrate the equipment has been installed and is properly reducing noise levels.

- **Idling Prohibition and Enforcement:** CVWD and CSD shall prohibit unnecessary idling of internal combustion engines. In practice, this would mean turning off equipment if it would not be used for five or more minutes.

- **Install Measures to Reduce Vibration:** Should pile driving or a vibratory roller be required for Proposed Project construction, the contractor shall conduct vibration monitoring at any residences or buildings located less than 50 feet from construction activities using such equipment. Ground vibration levels at the nearest residential structure to the construction site shall be monitored using vibration sensor(s) or velocity transducer with adequate sensitivity capable of measuring peak particle velocity level in the frequency range of 1 Hz to 100 Hz. If the vibration level due to construction activities exceeds the Proposed Project's criteria of 0.2 inch/second, the contractor shall make modifications/revisions to construction methods for approval by CVWD and CSD. Measures may include features such as use of roller compactor in lieu of vibratory compactors to ensure that the PPV remains at less than the 0.2 inch/second threshold.

- **Pre-Construction Notification:** At least two weeks prior to construction, written notifications to residents within 500 feet of the Proposed Project shall be sent, identifying the type, duration, and frequency of construction activities. For sensitive receptors, written notification shall either be hand-delivered or sent via certified mail. Signage shall also be posted at the construction site. Notifications shall also identify a mechanism for residents to complain to CVWD for construction related noise. As required by the California Coastal Commission, noticing to mariners will be provided in advance of work on the ocean outfall.

- **Schedule Construction on School Property Outside the School Year:** If Well Site #1 is selected for an injection well, construction at Well Site #1 shall be limited to school holidays (summer, winter, or spring break) as appropriate for the required construction timeframe.

- **Appoint a Primary Point of Contact:** CVWD and CSD will appoint a staff member or a third-party public information officer to act as primary point of contact for their respective components of the Proposed Project. This point of contact shall serve as a public information officer to receive comments from the public, as well as provide updated project information as appropriate during the project planning, design, and construction stages.

3.15 Population and Housing

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

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

Mitigation Measures

None required or recommended.

3.16 Public Services

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

3.16-1) Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:

Fire protection

Police protection

Schools

Parks

Other public facilities

Approved Project

The Approved Project would be constructed within roadway ROWs and may be constructed on public park sites, school property, or other public or semi-public sites. Construction activities could temporarily disrupt portions of these properties, and consistent with **Mitigation Measure MM 3.1-1** (Minimize Tank Size and Install Screening) aboveground facilities would be secured with fencing and visually screened to reduce potential impacts to the aesthetic character of the well sites. Construction activities could result in delayed response times for emergency services due to construction-related traffic delays and/or detours. **Mitigation Measure 3.18-1** (Transportation Management Plan) requires a Transportation Management Plan that considers the needs of emergency services and would reduce impacts to less than significant.

Modified Project

Moving the Linden Injection Well and the Meadow View Well into the roadway ROW would reduce the potential impacts to semi-public sites (the two church properties) compared to

the Approved Project. As with the Approved Project, the Modified Project would have some aboveground facilities for the injection wells, that would be screened with vegetation and/or fencing to reduce potential visual impacts to less than significant, though the backflush tank would be eliminated and replaced with 48-inch below ground pipeline, eliminating the potential for impacts from the aboveground backwash tank as well as eliminating the need for **Mitigation Measure 3.1-1**. The Modified Project would result in the same types of potential impacts to emergency services as the Approved Project because it would also include lane closures during construction. **Mitigation Measure 3.18-1** would also be required to reduce potential impacts to emergency services to less than significant. With incorporation of the previously adopted Mitigation Measures from the EIR, impacts would remain less than significant. Therefore, no new impact would occur as a result of the Modified Project and no new mitigation would be required.

Mitigation Measures:

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

3.17 Recreation

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

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

Mitigation Measures

None required or recommended.

3.18 Transportation

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

3.18-1) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities

Approved Project

The Approved Project would have temporary impacts during construction by temporarily changing the provision of roadways, public transit, bicycle and/or pedestrian facilities within the Study Area. Specifically, lane and/or road closures may be required where pipelines would be installed in roadway ROW. Construction equipment and materials would be staged temporarily either within the construction zone on roads or vacant parcels near the construction area which may temporarily impact transit stops, bicycle and/or pedestrian facilities. The pipeline may be constructed along Linden and Carpinteria Avenues, both of which are high-traffic, arterial roadways. **Mitigation Measure MM 3.18-1** would be required to reduce impacts to less than significant. Under **Mitigation Measures MM 3.18-1**, a Transportation Management Plan would be developed. The Transportation Management Plan would include applicable measures, such as the use of flaggers, signage, cones, and other traffic control measures, to reduce construction-related traffic congestion as well as clearly define temporary detour routes.

Modified Project

The Modified Project would result in similar road or lane closures as the Approved Project. Though the specific locations of the injection wells and monitoring wells may be different than the Approved Project, the pipelines would be constructed in the same roadways as the Approved Project, including along Linden and Carpinteria Avenues, and **Mitigation Measure MM 3.18-1** would be required to reduce impacts to less than significant. With incorporation of the previously adopted Mitigation Measures from the EIR, impacts would remain less than significant. Therefore, no new transportation impacts would occur as a result of the Modified Project and no new mitigation would be required.

3.18-3) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)

Approved Project

The Approved Project could temporarily change the configuration of intersections and roadways within the Study Area due to the potential lane or roadway closures or detours where pipelines would be installed within roadway ROWs, or if construction equipment or materials are staged in the roadway shoulders. Because lane detours or closures could increase conflicts between vehicles, bicyclists, and pedestrians, potential impacts would be considered significant, and however, with implementation of **Mitigation Measure MM 3.18-1** impacts would be reduced to less than significant. **Mitigation Measure MM 3.18-1** requires a Transportation Management Plan that would include measures to reduce potential transportation hazards caused by a changed roadway configuration or design feature to less than significant.

Modified Project

The Modified Project would result in similar land and roadway closures or detours as the Approved Project, and would therefore result in similar potential for impacts. Consistent with the Approved Project, implementation of **Mitigation Measure MM 3.18-1** (Transportation Management Plan) would be required to reduce impacts to less than

significant. With incorporation of the previously adopted Mitigation Measures from the EIR, impacts would remain less than significant. Therefore, no new impact would occur as a result of the Modified Project and no new mitigation would be required.

3.18-4) Result in inadequate emergency access

Approved Project

Construction activities for the Approved Project would have temporary effects on traffic flow and lane configurations at specific intersections and roadways, which could similarly affect emergency access and response times in the Study Area. **Mitigation Measure MM 3.18-1** would require the development and implementation of a Transportation Management Plan which would outline temporary detour routes and alternative emergency access routes. CVWD would coordinate with local emergency response agencies such as police and fire to alert these entities about potential construction delays and detours. CVWD would minimize the duration of disruptions/closures to roadways and critical access points for emergency services to the extent feasible. With implementation of **Mitigation Measure MM 3.18-1**, impacts to emergency access would be reduced to less than significant levels.

Modified Project

As with the Approved Project, the Modified Project would have temporary effects on traffic flow and lane configurations at specific intersections and roadways during construction due to the roadway and lane closures or detours during construction. To reduce potential impacts, **Mitigation Measure MM 3.18-1** (Transportation Management Plan) would be implemented under the Modified Project. With incorporation of the previously adopted Mitigation Measures from the EIR, impacts would remain less than significant. Therefore, no new transportation impact would occur as a result of the Modified Project and no new mitigation would be required.

Mitigation Measures:

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

- **MM 3.18-1 Develop and Implement a Transportation Management Plan.** Prior to construction, a Transportation Management Plan shall be developed by CVWD. Prior to construction, a Transportation Management Plan shall be developed by CVWD. The Transportation Management Plan shall be implemented by CVWD and/or its construction contractor during construction of the Proposed Project and shall conform to Caltrans' Transportation Management Plan Guidelines. Such a plan shall include, but is not limited to:

- **Transportation Routes:** CVWD shall determine construction staging site locations and potential road closures, alternate routes for detours, and planned routes for construction-related vehicle traffic. It shall also identify alternative safe routes and policies to maintain safety along bike and pedestrian routes during construction.

- **Coordination with Emergency Services:** CVWD shall coordinate with the police, fire, and other emergency services to alert these entities about potential construction delays and alternate emergency access routes if necessary. To the extent possible, CVWD shall minimize the duration of disruptions/closures to roadways and critical access points for emergency services.

- **Coordination with Recreation Facilities:** CVWD shall also coordinate with any affected recreational facilities owners/operators to minimize the duration of disruptions/closures to recreational facilities and adjacent access points.

- **Coordination with Metropolitan Transit District (MTD):** If the Proposed Project will affect access to existing MTD bus stops, the Transportation Management Plan shall also include temporary, alternative bus stops, as determined in coordination with MTD.

- **Coordination with Caltrans:** CVWD shall coordinate with Caltrans on its construction schedule, potential road or lane closures, and alternate routes that may affect Caltrans-owned or operated facilities and to confirm the Transportation Management Plan conforms with Caltrans' Transportation Management Plan Guidelines.

- **Coordination with Schools:** CVWD shall coordinate timing of construction with the nine schools in the vicinity of the Proposed Project to minimize construction impacts during the regular school year.

- **Transportation Control and Safety:** The Transportation Management Plan shall provide for traffic control measures including flag persons, warning signs, lights, barricades, cones, and/or detour routes to provide safe passage of vehicular, bicycle and pedestrian traffic and access by emergency responders.

- **Plan Approval:** This plan shall be submitted to the City's planning or public works departments for review and acceptance by the City Transportation Safety Committee, Transportation Committee, and City Public Works Director/City Engineer, as well as any necessary permits acquired prior to construction.

- **Public Notification:** Prior to beginning construction, written notice shall be provided regarding potential road closures as described in the Transportation Management Plan. Notice shall be delivered to potentially affected properties within a 500-foot radius, as determined by the City's Public Works Director/City Engineer. The notice shall contain a brief description of the work, work dates,

and contact information of the Contractor's superintendent and the Engineer. The notice shall be delivered at ten (10) calendar days and again at two (2) working days prior to beginning the work. The notice shall be in the form of a door hanger made of index paper with the size of 14 inches by 4.5 inches. The notice shall be in English with translation in Spanish. A revised notice will be delivered in the event of delays in schedule, as soon as reasonably possible after a delay is identified and revised schedule known.

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

3.19 Tribal Cultural Resources

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

3.19-1) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)

Approved Project

The Cultural Resources Assessment Report conducted for the Approved Project (included as Appendix E to the EIR) identified one previously-recorded cultural resource within the Study Area. This was prehistoric archaeological site CA-SBA-7, a large prehistoric/ethnohistoric village site that is thought to represent the remains of the Chumash village of Mishopshow. Although previous archaeological investigations found fragments of shells west of Carpinteria Creek, evidence for the presence of CA-SBA-7 in the vicinity of the current Study Area is minimal and the site's substantial cultural deposits are concentrated on the east side of Carpinteria Creek outside of the Study Area. Because of cultural sensitivity of the area, the presence of prehistoric archaeological site CA-SBA-7, and the grading and excavation activities that would occur during construction, the EIR found that there would be potential to uncover archaeological or other significant tribal cultural resources during construction, and mitigation was required. **Mitigation Measures MM 3.6-2a** (Archaeological and Native American Monitoring), **MM 3.6-2b** (Unanticipated Discovery of Cultural Resources) and **MM 3.6-3** (Unanticipated Discovery of Human Remains) would reduce impacts to less than significant by implementing archaeological and Native American monitoring, halting construction activities if unanticipated discovery of cultural resources occurs, and compliance with the State of California Health and Safety Code 7050.5, including immediately halting construction activities and notifying the County Coroner's office upon discovery of human remains. Additionally, CVWD would implement cultural resources training for construction workers, including archaeological and tribal resource identification

Modified Project

The Modified Project would be constructed within the 0.5 mile Study Area evaluated in the Cultural Resources Assessment. It would construct the same types of facilities as the Approved Project, and a reduced number of injection and monitoring wells, using the same or substantially similar construction methods, including excavation. It would not move any project facilities to the east side of Carpinteria Creek where CA-SBA-7's substantial cultural deposits are concentrated. As such, the Modified Project would have the same potential for impacts on Tribal Cultural Resources as the Approved Project, and **Mitigation Measures MM 3.6-2a, MM 3.6-2b,** and **MM 3.6-3** would be implemented to reduce impacts to less than significant. With incorporation of the previously adopted Mitigation Measures from the EIR, impacts would remain less than significant. Therefore, no new impact would occur as a result of the Modified Project and no new mitigation would be required.

3.19-2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe

Approved Project

The EIR identified one site of one previously-recorded cultural resource within the Study Area - prehistoric archaeological site CA-SBA-7. This site is an important tribal cultural resource mapped within the Study Area. Although it is not anticipated that construction of the Approved Project would substantially impact this resource, there is potential to encounter other previously uncovered tribal cultural resources during ground-disturbing construction activities. As a result, **Mitigation Measures MM 3.6-2a** (Archaeological and Native American Monitoring), **MM 3.6-2b** (Unanticipated Discovery of Cultural Resources) and **MM 3.6-3** (Unanticipated Discovery of Human Remains) would be required to reduce impacts to less than significant by implementing archaeological and Native American monitoring, halting construction activities if unanticipated discovery of cultural resources occurs, and compliance with the State of California Health and Safety Code 7050.5, including immediately halting construction activities and notifying the County Coroner's office upon discovery of human remains.

Modified Project

The Modified Project would be constructed within the 0.5 mile Study Area evaluated in the Cultural Resources Assessment. It would construct the same number and types of facilities as the Approved Project, using the same or substantially similar construction methods, including excavation. As such, the Modified Project would have the same potential for impacts on Tribal Cultural Resources as the Approved Project, and **Mitigation Measures MM 3.6-2a, MM 3.6-2b,** and **MM 3.6-3** would be implemented to reduce impacts to less than significant. With incorporation of the previously adopted Mitigation Measures from the EIR, impacts would remain less than significant. Therefore,

no new impact would occur as a result of the Modified Project and no new mitigation would be required.

Mitigation Measures:

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

3.20 Utilities and Service Systems

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

The Modified Project would not change the overall types of facilities constructed or the volume of water produced. It would move the location of two injection wells and some of the monitoring wells, but would not move them to a location that could impact utilities or service systems in a different manner than the Approved Project. Therefore, similar to the Approved Project, the Modified Project would not impact utilities or service systems.

3.21 Wildfire

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

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

Approved Project

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

Modified Project

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

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

Approved Project

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

Modified Project

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

3.21-3) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment

Approved Project

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

Modified Project

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

Mitigation Measures:

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

3.22 Environmental Justice

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

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

Mitigation Measures

None required or recommended.

3.23 Federal Crosscutters

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

4. CONCLUSIONS

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