Board of Directors

Brian Brennan, Director
Richard Hajas, Director
Neil Cole, Director
Mary Bergen, Director
Pete Kaiser, Director

CASITAS MUNICIPAL WATER DISTRICT
Meeting to be held at the

District Office
1055 Ventura Ave. Oak View, CA
www.casitaswater.org

Join Zoom Meeting
https://us06web.zoom.us/j/91094478837?pwd=VnNOQTZyQVk4K2pnaWpjYVl1TkpRdz09
Meeting ID: 910 9447 8837 Passcode: 736519

To join by phone, call (888) 788-0099 or (877) 853-5247
Enter Meeting ID: 910 9447 8837# Passcode: 736519#

December 11, 2024 @ 5:00 PM

Right to be heard: Members of the public have a right to address the Board directly on any item of interest to the public which is within the subject matter jurisdiction of the Board. The request to be heard should be made immediately before the Board's consideration of the item. No action shall be taken on any item not appearing on the agenda unless the action is otherwise authorized by subdivision (b) of ¶54954.2 of the Government Code and except that members of a legislative body or its staff may briefly respond to statements made or questions posed by persons exercising their public testimony rights under section 54954.3 of the Government Code.
Special Accommodations: If you require special accommodations for attendance at or participation in this meeting, please notify our office 24 hours in advance at (805) 649-2251, ext. 113. (Govt. Code Section 54954.1 and 54954.2(a)).

1. CALL TO ORDER
2. ROLL CALL
3. PLEDGE OF ALLEGIANCE
4. AGENDA CONFIRMATION
5. PUBLIC COMMENTS - Presentation on District related items that are not on the agenda - three minute limit.

6. CONSENT AGENDA

6.a Accounts Payable Report.
Accounts Payable Report.pdf

6.b Minutes of the November 13, 2024 Board Meeting.

7. ACTION ITEMS

7.a Deny a water billing appeal request from Agricultural-Domestic Customer Camp Ramah in the amount of $19,000.
Camp Ramah - Board Memo 121124.pdf

7.b Recommend scheduling a public hearing on January 22, 2025 to consider adoption of the Initial Study and Mitigated Negative Declaration (IS-MND) for the annual Routine Repair and Maintenance Program for the existing Robles Diversion and Fish Passage Facility.
Robles_RM_Program_BoardMemo_12.11.2024.pdf
ATT1. CMWD_Robles RM-Program_IS-MND_2024-12-11_Final.pdf
ATT2. Responses to Comments on the Draft MND.pdf

7.c Authorize the General Manager to issue a Task Order to Rincon Consultants, Inc. for the Casitas and Ojai Water System Consolidation project in the amount not to exceed $91,455.00.
Board Memo_CEQA_20241211.pdf
Rincon Proposal_Casitas Ojai Consolidation CEQA 12-5-24.pdf

8. INFORMATION ITEMS

8.a Hydrology Report.
Hydrology Report October 2024.pdf

8.b Community Facilities District No. 2013-1 (Ojai) Special Tax and Bond Accountability Report.
Casitas MWD CFD No. 2013-1 (Ojai) SB 165 Report (2024).pdf

8.c State Water Project Intertie Report.
SWP Intertie Project Cost 11-30-24.pdf

8.d Investment Report.
Investment Report FY2025 November.pdf

8.e Consumption Report November.
Consumption Report.pdf

8.f Adjudication Charges Report.
Adjudication Charges YTD 11.30.24.pdf

9. GENERAL MANAGER COMMENTS

10. BOARD OF DIRECTOR REPORTS ON MEETINGS ATTENDED

11. BOARD OF DIRECTOR COMMENTS PER GOVERNMENT CODE SECTION 54954.2(a).

12. CLOSED SESSION

    12.a CONFERENCE WITH LEGAL COUNSEL - EXISTING LITIGATION (Government Code Section 54956.9(d)(1).
    Santa Barbara Channelkeeper v. State Water Resources Control Board, City of San Buenaventura, et al.; and City of San Buenaventura v Duncan Abbott, et al., Cross Complaint; Superior Court of the State of California, County of Los Angeles, Case No. 19STCP01176.

13. ADJOURNMENT

CASITAS MUNICIPAL WATER DISTRICT
General Fund Check Authorization
Checks Dated 11/07/24 - 12/04/24
Presented to the Board of Directors For Approval December 11, 2024

Check	Payee		Description		Amount
001327	Payables Fund Account	# 9759651478	Accounts Payable Batch 111324	$	324,652.15
001328	Payables Fund Account	# 9759651478	Accounts Payable Batch 112024	$	400,976.19
001329	Payables Fund Account	# 9759651478	Accounts Payable Batch 112724	$	340,614.00
001331	Payables Fund Account	# 9759651478	Accounts Payable Batch 120424	$	69,672.88
				$	1,135,915.22
001332	Payroll Fund Account	# 9469730919	Estimated Payroll 12/26/24	$	275,000.00
001333	Payroll Fund Account	# 9469730919	Estimated Payroll 01/09/25	$	275,000.00
				$	1,685,915.22

Publication of check register is in compliance with Section 53065.6 of the Government Code which requires the District to disclose reimbursements to employees and/or directors.

The above numbered checks,
001327-001333
have been duly audited is hereby certified as correct.

Rebekah Viviar
for Janyne Brown, Chief Financial Officer

A/P Fund

Publication of check register is in compliance with Section 53065.6 of the Government Code which requires the District to disclose reimbursements to employees and/or directors.

001327	A/P Checks:	054313-054363
	A/P Draft	000981-000990
	Voids:	
	054315 - Amazon Capital Services - Continuation of detail of check #054314	
001328	A/P Checks:	054364-054424
	A/P Draft	000991-000992
	Voids:	
	054370 - Amazon Capital Services - Continuation of detail of check #054369	
	054408 - Meiners Oaks Ace Hardware - Continuation of detail of check #054407	
	054409 - Meiners Oaks Ace Hardware - Continuation of detail of check #054407	
	054414 - Pops Auto Repair - Continuation of detail of check #054413	
001329	A/P Checks:	054425-054472
	A/P Draft	000993-001001
	Voids:	
	054456 - Meiners Oaks Ace Hardware - Continuation of detail of check #054455	
001331	A/P Checks:	054473-054516
	A/P Draft	001002
	Voids:	

for Janyne Brown, Chief Financial Officer

CERTIFICATION

Payroll disbursements for the pay period ending 11/09/24
Pay Date 11/14/24
have been duly audited and are
hereby certified as correct.

Signed: Rebekah Vien
for Janyne Brown

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CERTIFICATION

Payroll disbursements for the pay period ending 11/23/24
Pay Date 11/27/24
have been duly audited and are
hereby certified as correct.

Signed: Rebekah Vieira
for Janyne Brown

^

VENDOR SET: 01 Casitas Municipal Water D
BANK: * ALL BANKS
DATE RANGE:11/07/2024 THRU 12/04/2024

VENDOR I.D.	NAME	STATUS	CHECK DATE	INVOICE AMOUNT	DISCOUNT	CHECK NO	CHECK STATUS	CHECK AMOUNT
C-CHECK	VOID CHECK	V	11/13/2024			054315		
C-CHECK	VOID CHECK	V	11/20/2024			054370		
C-CHECK	VOID CHECK	V	11/20/2024			054408		
C-CHECK	VOID CHECK	V	11/20/2024			054409		
C-CHECK	VOID CHECK	V	11/20/2024			054414		
C-CHECK	VOID CHECK	V	11/27/2024			054456		

* * T O T A L S * *	NO			INVOICE AMOUNT	DISCOUNTS	CHECK AMOUNT
REGULAR CHECKS:	0			0.00	0.00	0.00
HAND CHECKS:	0			0.00	0.00	0.00
DRAFTS:	0			0.00	0.00	0.00
EFT:	0			0.00	0.00	0.00
NON CHECKS:	0			0.00	0.00	0.00
VOID CHECKS:	6	VOID DEBITS	0.00			
		VOID CREDITS	0.00	0.00	0.00	

TOTAL ERRORS: 0

	NO	INVOICE AMOUNT	DISCOUNTS	CHECK AMOUNT
VENDOR SET: 01 BANK: TOTALS:	6	0.00	0.00	0.00
BANK: TOTALS:	6	0.00	0.00	0.00

VENDOR SET: 01 Casitas Municipal Water D
BANK: AP ACCOUNTS PAYABLE
DATE RANGE:11/07/2024 THRU 12/04/2024

VENDOR	I.D.	NAME	STATUS	CHECK DATE	INVOICE AMOUNT	DISCOUNT	CHECK NO	CHECK STATUS	CHECK AMOUNT
01483		CORVEL CORPORATION							
	I-111224-CMWD	Corvel Claims 11/05-11/11/24	D	11/13/2024	684.42		000981		684.42
05937		Enterprise FM Trust							
	I-585916A-110624	Vehicle Maintenance	D	11/13/2024	21,956.28		000982		21,956.28
00131		JCI JONES CHEMICALS, INC							
	I-954892	Chlorine - TP, CM954921	D	11/13/2024	5,468.36		000983		5,468.36
00124		ICMA RETIREMENT TRUST - 457							
	I-DCI202411122354	DEFERRED COMP FLAT	D	11/13/2024	2,584.62		000984		
	I-DI%202411122354	DEFERRED COMP PERCENT	D	11/13/2024	368.64		000984		2,953.26
00128		INTERNAL REVENUE SERVICE							
	I-T1 202411122354	Federal Withholding	D	11/13/2024	44,251.21		000985		
	I-T3 202411122354	SS Withholding	D	11/13/2024	38,993.12		000985		
	I-T4 202411122354	Medicare Withholding	D	11/13/2024	11,495.20		000985		94,739.53
00985		NATIONWIDE RETIREMENT SOLUTION							
	I-CUN202411122354	457 CATCH UP	D	11/13/2024	840.79		000986		
	I-DCN202411122354	DEFERRED COMP FLAT	D	11/13/2024	10,418.74		000986		
	I-DN%202411122354	DEFERRED COMP PERCENT	D	11/13/2024	1,399.67		000986		12,659.20
00187		CALPERS							
	I-PBB202411122354	PERS BUY BACK	D	11/13/2024	130.46		000987		
	I-PEB202411122354	PEPRA EMPLOYEES PORTION	D	11/13/2024	12,045.59		000987		
	I-PEM202411122354	PERS EMPLOYEE PORTION MGMT	D	11/13/2024	2,043.02		000987		
	I-PER202411122354	PERS EMPLOYEE PORTION	D	11/13/2024	7,251.33		000987		
	I-PRB202411122354	PEBRA EMPLOYER PORTION	D	11/13/2024	12,232.11		000987		
	I-PRR202411122354	PERS EMPLOYER PORTION	D	11/13/2024	14,383.68		000987		48,086.19
00180		S.E.I.U. - LOCAL 721							
	I-COP202411122354	SEIU 721 COPE	D	11/13/2024	2.50		000988		
	I-UND202411122354	UNION DUES	D	11/13/2024	889.25		000988		891.75
00049		STATE OF CALIFORNIA							
	I-SDI202411122354	CASDI Withholding	D	11/13/2024	2,484.91		000989		
	I-T2 202411122354	STATE WITHHOLDING (CA)	D	11/13/2024	17,375.58		000989		19,860.49
05790		STATE OF OREGON							
	I-OST202411122354	OR STATE TRANSIT TAX	D	11/13/2024	6.43		000990		
	I-T2 202411122354	STATE WITHHOLDING (OR)	D	11/13/2024	473.91		000990		480.34

VENDOR SET: 01 Casitas Municipal Water D
BANK: AP ACCOUNTS PAYABLE
DATE RANGE:11/07/2024 THRU 12/04/2024

VENDOR	I.D.	NAME	STATUS	CHECK DATE	INVOICE AMOUNT	DISCOUNT	CHECK NO	CHECK STATUS	CHECK AMOUNT
01483		CORVEL CORPORATION							
	I-111924-CMWD	Corvel Claims 11/12-11/18/24	D	11/20/2024	334.18		000991		334.18
03910		DoiT International USA, INC							
	I-IN244016336	Google Apps 10/24	D	11/20/2024	2,652.00		000992		2,652.00
01483		CORVEL CORPORATION							
	I-112624-CMWD	Corvel Claims 11/19-11/25/24	D	11/27/2024	27.45		000993		27.45
00131		JCI JONES CHEMICALS, INC							
	I-956134	Chlorine - TP, CM956147	D	11/27/2024	5,467.41		000994		5,467.41
00124		ICMA RETIREMENT TRUST - 457							
	I-DCI202411252356	DEFERRED COMP FLAT	D	11/27/2024	2,584.62		000995		
	I-DI%202411252356	DEFERRED COMP PERCENT	D	11/27/2024	389.42		000995		2,974.04
00128		INTERNAL REVENUE SERVICE							
	I-T1 202411252356	Federal Withholding	D	11/27/2024	46,278.91		000996		
	I-T3 202411252356	SS Withholding	D	11/27/2024	37,354.00		000996		
	I-T4 202411252356	Medicare Withholding	D	11/27/2024	11,842.31		000996		95,475.22
00985		NATIONWIDE RETIREMENT SOLUTION							
	I-CUN202411252356	457 CATCH UP	D	11/27/2024	514.77		000997		
	I-DCN202411252356	DEFERRED COMP FLAT	D	11/27/2024	10,018.74		000997		
	I-DN%202411252356	DEFERRED COMP PERCENT	D	11/27/2024	1,396.38		000997		11,929.89
00187		CALPERS							
	I-PBB202411252356	PERS BUY BACK	D	11/27/2024	130.46		000998		
	I-PEB202411252356	PEPRA EMPLOYEES PORTION	D	11/27/2024	12,366.41		000998		
	I-PEM202411252356	PERS EMPLOYEE PORTION MGMT	D	11/27/2024	2,077.58		000998		
	I-PER202411252356	PERS EMPLOYEE PORTION	D	11/27/2024	7,192.28		000998		
	I-PRB202411252356	PEBRA EMPLOYER PORTION	D	11/27/2024	12,557.88		000998		
	I-PRR202411252356	PERS EMPLOYER PORTION	D	11/27/2024	14,346.22		000998		48,670.83
00180		S.E.I.U. - LOCAL 721							
	I-COP202411252356	SEIU 721 COPE	D	11/27/2024	2.50		000999		
	I-UND202411252356	UNION DUES	D	11/27/2024	889.25		000999		891.75
00049		STATE OF CALIFORNIA							
	I-SDI202411252356	CASDI Withholding	D	11/27/2024	2,590.93		001000		
	I-T2 202411252356	STATE WITHHOLDING (CA)	D	11/27/2024	17,971.71		001000		20,562.64
05790		STATE OF OREGON							
	I-OST202411252356	OR STATE TRANSIT TAX	D	11/27/2024	6.78		001001		
	I-T2 202411252356	STATE WITHHOLDING (OR)	D	11/27/2024	504.68		001001		511.46

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VENDOR	I.D.	NAME	STATUS	CHECK DATE	INVOICE AMOUNT	DISCOUNT	CHECK NO	CHECK STATUS	CHECK AMOUNT
01483		CORVEL CORPORATION							
	I-120324-CMWD	Corvel Claims 11/26-12/02/24	D	12/04/2024	685.26		001002		685.26
00010		AIRGAS USA LLC							
	I-9155195484	Wheel Stringer Bead & Brush Wh	R	11/13/2024	341.41		054313		
	I-9155387326	Weld on Hinge 6" Steel - PL	R	11/13/2024	144.01		054313		485.42
03044		Amazon Capital Services							
	I-13DR-QV1H-339G	Lithium Batteries - O&M	R	11/13/2024	23.54		054314		
	I-17HF-XRRL-DTC4	Mower Replacement Blade Set	R	11/13/2024	63.72		054314		
	I-1FD4-XVN1-4C1M	Work Pants - EM	R	11/13/2024	314.90		054314		
	I-1FT6-V63J-1KLX	Eraser - ADM	R	11/13/2024	2.50		054314		
	I-1FT6-V63J-GDHP	Eyewash Saline Solution - MAIN	R	11/13/2024	183.95		054314		
	I-1K4P-L39X-VQ4M	Door Kick Plate - MAINT	R	11/13/2024	92.22		054314		
	I-1LX4-4VX6-1MCH	Uniform Shirts - LCRA	R	11/13/2024	243.96		054314		
	I-1NMX-VLC7-CQHD	Cable Sleeves & Rubber Hinge	R	11/13/2024	39.50		054314		
	I-1PMD-WW4C-4DCT	T-Shirts Uniforms - LCRA	R	11/13/2024	93.28		054314		
	I-1PRJ-PDKQ-14RD	File Folders - ADM	R	11/13/2024	26.31		054314		
	I-1QLV-79PQ-TPRW	HD Pro Webcam - EM	R	11/13/2024	75.06		054314		
	I-1QLV-79PQ-TPXL	Privacy Indicator Lock - MAINT	R	11/13/2024	70.65		054314		
	I-1T7X-J39-CRXJ	Door Kick Plate - MAINT	R	11/13/2024	100.80		054314		
	I-1YM4-JX77-FGYH	Permanent Markers - LCRA	R	11/13/2024	26.69		054314		1,357.08
00014		AQUA-FLO SUPPLY							
	I-SI2422071	Drain Spade & Ball Valve - UT	R	11/13/2024	318.52		054316		
	I-SI2422077	Couplings & Nipple - LCRA	R	11/13/2024	122.35		054316		440.87
00840		AQUA-METRIC SALES COMPANY							
	I-INV0104734	1" Meters - UT	R	11/13/2024	10,220.50		054317		10,220.50
01703		ARNOLD LAROCHELLE MATTHEWS							
	I-11305	Metter #5088.001	R	11/13/2024	3,406.03		054318		
	I-11306	Metter - Skihigh	R	11/13/2024	600.00		054318		4,006.03
01666		AT & T							
	I-000022585531	Local, Reginal, long Distance	R	11/13/2024	644.29		054319		644.29
00018		AT & T MOBILITY							
	I-287290467941X1124	Acct#287290467941	R	11/13/2024	250.37		054320		
	I-287294256431X1124	Acct#287294256431	R	11/13/2024	1,088.65		054320		1,339.02
03429		AT&T							
	I-4178315903	Acct#83100130748846	R	11/13/2024	8.00		054321		8.00

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VENDOR	I.D.	NAME	STATUS	CHECK DATE	INVOICE AMOUNT	DISCOUNT	CHECK NO	CHECK STATUS	CHECK AMOUNT
01242		AUTOMATIONDIRECT.COM INC.							
	I-17158846	Wiegmann Ultimate Series - TP	R	11/13/2024	900.90		054322		
	I-17158849	Wiegmann Ultimate Series	R	11/13/2024	900.90		054322		1,801.80
00030		B&R TOOL AND SUPPLY CO							
	I-1901006437	Adjustable Wrench & Edge 2K Ed	R	11/13/2024	280.82		054323		
	I-1901006720	Drinking Fountain - LCRA	R	11/13/2024	2,274.34		054323		
	I-1901006821	Air Hammer kit & Ratchet - PL	R	11/13/2024	580.50		054323		
	I-1901007152	Throttle Lever & Wire Assy - M	R	11/13/2024	288.99		054323		
	I-1901007153	Upside Down White Chalk - UT	R	11/13/2024	213.35		054323		
	I-1901007154	Prodo Socket 1/2 15PC - UT	R	11/13/2024	156.03		054323		3,794.03
02836		Gonzalo Carbajal-Ramirez							
	I-Oct 24	Reimburse Expenses 10/24	R	11/13/2024	351.32		054324		351.32
00055		CASITAS BOAT RENTALS							
	I-Oct 24	Gas for Boat - LCRA	R	11/13/2024	159.69		054325		159.69
00117		CERTEX USA, INC							
	I-10824612-00	Gloves & 11"X8" Poly Web Sling	R	11/13/2024	127.05		054326		127.05
06293		Christina Vanarelli, Inc							
	I-9215	Metter #519-001	R	11/13/2024	11.00		054327		11.00
01843		COASTAL COPY							
	I-1127414	Copier Usage - LCRA	R	11/13/2024	177.25		054328		177.25
00062		CONSOLIDATED ELECTRICAL							
	I-9009-1052650	UR-I IDC Conn - UT	R	11/13/2024	130.22		054329		130.22
02115		Consumers Pipe Supply Co.							
	I-S1668838.001	Claval Repair Kit & Kit Rppt	R	11/13/2024	1,602.06		054330		1,602.06
06127		Dion & Sons, Inc							
	I-SP26289	Gas - LCRA	R	11/13/2024	1,632.21		054331		
	I-SP26290	Diesel - LCRA	R	11/13/2024	2,237.21		054331		3,869.42
00086		E.J. Harrison & Sons Inc							
	I-101524	Acct#1C00054230	R	11/13/2024	3,689.51		054332		3,689.51
06108		EMCOR Service Mesa Energy							
	I-911015091	AC Service - LCRA	R	11/13/2024	2,079.75		054333		2,079.75

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DATE RANGE:11/07/2024 THRU 12/04/2024

VENDOR	I.D.	NAME	STATUS	CHECK DATE	INVOICE AMOUNT	DISCOUNT	CHECK NO	CHECK STATUS	CHECK AMOUNT
00095		FAMCON PIPE & SUPPLY							
	I-S100140876.001	Valve, MJ X Flg 6' Mueller -PL	R	11/13/2024	1,603.92		054334		1,603.92
00369		HARRINGTON INDUSTRIAL PLASTICS							
	I-013D5197	Tubing - TP	R	11/13/2024	108.86		054335		108.86
05746		Hasa Inc.							
	I-1004369	Sodium Hypochlorite - TP	R	11/13/2024	3,718.82		054336		3,718.82
00437		HERC RENTALS INC							
	I-34515380-007	Rent Skiploader - MAINT	R	11/13/2024	2,323.18		054337		2,323.18
02940		Holliday Rock Co, Inc.							
	I-1691259	2500psi 1" Place only - LCRA	R	11/13/2024	1,683.15		054338		1,683.15
00596		HOME DEPOT							
	I-9901051	Roofing Shingles - LCRA	R	11/13/2024	1,411.14		054339		1,411.14
00127		INDUSTRIAL BOLT & SUPPLY							
	I-258126-1	Hex Nut & Hex Bolt - PL	R	11/13/2024	422.38		054340		422.38
04302		J&J Chemical Co.							
	I-316508	Propaxx Elite XL Gold - LCRA	R	11/13/2024	749.03		054341		749.03
06066		Loomis							
	I-13605146	Armored Truck Service - LCRA	R	11/13/2024	326.96		054342		326.96
00151		MEINERS OAKS ACE HARDWARE							
	C-093381	Lock Return - LCRA	R	11/13/2024	29.27CR		054343		
	I-097545	Caulkgun Piston & Rubber Paste	R	11/13/2024	44.63		054343		
	I-097763	Knife & Batteries - MAINT	R	11/13/2024	12.21		054343		
	I-098191	Kitchen Faucet - TP	R	11/13/2024	62.83		054343		
	I-098200	Shovel & Flat Washer - PL	R	11/13/2024	69.04		054343		
	I-098272	Batteries - PL	R	11/13/2024	9.37		054343		
	I-098444	Respirator Mask & Knife - UT	R	11/13/2024	53.64		054343		
	I-098447	Hammer - UT	R	11/13/2024	41.46		054343		263.91
03444		Mission Linen Supply							
	I-522587997	Uniform Pants - TP	R	11/13/2024	40.00		054344		
	I-522683225	Uniform Pants - MAINT	R	11/13/2024	40.00		054344		
	I-522736974	Uniform Pants - PL	R	11/13/2024	46.79		054344		
	I-522736975	Uniform Pants - MAINT	R	11/13/2024	28.13		054344		
	I-522736978	Uniform Pants - TP	R	11/13/2024	53.41		054344		208.33

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01570		Ojai Auto Supply							
	I-603945	Battery - WP	R	11/13/2024	47.44		054345		
	I-604567	Battery - LCRA	R	11/13/2024	94.57		054345		
	I-604627	Headlight Socket - LCRA	R	11/13/2024	8.33		054345		
	I-606150	Motor Oil - Unit 012	R	11/13/2024	43.40		054345		193.74
00165		OJAI LUMBER CO, INC							
	I-2411-814319	Douglas Fir - MAINT	R	11/13/2024	82.36		054346		82.36
00168		OJAI VALLEY NEWS							
	I-10958	Best of Ojai 2024 Ad - PR	R	11/13/2024	375.00		054347		
	I-11238	Ad 11/08/24	R	11/13/2024	183.00		054347		558.00
00169		OJAI VALLEY SANITARY DISTRICT							
	I-26535a	Cust #99991 07/24	R	11/13/2024	5,589.56		054348		5,589.56
00169		OJAI VALLEY SANITARY DISTRICT							
	I-26536	Cust #99991 08/24	R	11/13/2024	5,325.16		054349		5,325.16
00169		OJAI VALLEY SANITARY DISTRICT							
	I-26537	Cust #99991 09/24	R	11/13/2024	3,587.55		054350		3,587.55
00790		PROFORMA							
	I-BI85013382A	Tablecloths - WP	R	11/13/2024	880.18		054351		880.18
10042		PSR ENVIRONMENTAL SERVICE, INC							
	I-19922	Gas Tank Inspection - DO	R	11/13/2024	250.00		054352		
	I-19923	Gas Tank Inspection - LCRA	R	11/13/2024	250.00		054352		
	I-19938	Annual UST Monitor Cert - Dist	R	11/13/2024	2,309.93		054352		2,809.93
04635		John Simon							
	I-110724	Safety Boot Stipend	R	11/13/2024	205.00		054353		205.00
00215		SOUTHERN CALIFORNIA EDISON							
	I-110524a	Acct#700598317666	R	11/13/2024	40.83		054354		
	I-110524b	Acct#700030209177	R	11/13/2024	27,787.89		054354		
	I-110624	Acct#700028735181	R	11/13/2024	11,343.56		054354		39,172.28
02703		Sunbelt Rentals							
	I-161220177-0001	Rent Water Truck - PL	R	11/13/2024	2,290.65		054355		2,290.65
01147		SUPERIOR GATE SYSTEMS							
	I-5230	Gate Repair DO - MAINT	R	11/13/2024	150.00		054356		150.00

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06064		T-Mobile							
	I-103124	Acct#987771959	R	11/13/2024	31.15		054357		31.15
01959		The Wharf							
	I-309676	Uniform Jacket - UT	R	11/13/2024	135.72		054358		
	I-310759	Uniform Jacket - UT	R	11/13/2024	125.10		054358		260.82
01173		TOICO INDUSTRIES, INC.							
	I-0236690-IN	Camlock X Hose - LCRA	R	11/13/2024	57.56		054359		57.56
03058		VC Metals Inc							
	I-78432	Angle 6X6X3/8 - WP	R	11/13/2024	599.62		054360		599.62
03758		County of Ventura - Fleet Serv							
	I-9117-2409	Fleet Service - Unit 282/89	R	11/13/2024	4,066.80		054361		4,066.80
06056		Ameriflex							
	I-DPC202411122354	Dependant Care	R	11/13/2024	461.54		054362		
	I-FSA202411122354	FSA Deduction	R	11/13/2024	1,186.44		054362		1,647.98
00102		FRANCHISE TAX BOARD							
	I-G09202411122354	Payroll Deduction	R	11/13/2024	250.00		054363		250.00
02297		AAA AWNINGS INC.							
	I-9490	Aluminum Awning Roof	R	11/20/2024	4,000.00		054364		4,000.00
02731		AED Superstore/Annuvia							
	I-INV3508561	Training Adult AED Cartridge	R	11/20/2024	732.98		054365		
	I-INV3508566	PM Electrode Adult Cartridge	R	11/20/2024	235.62		054365		968.60
01325		Aflac Worldwide Headquarters							
	I-006085	Suuplemental Insurance 11/24	R	11/20/2024	2,790.36		054366		2,790.36
00010		AIRGAS USA LLC							
	I-5512107060	Gas Cylinder Rental - PL	R	11/20/2024	487.33		054367		
	I-5512107253	Gas Cylinder Rental - PL	R	11/20/2024	120.96		054367		608.29
00012		ALL-PHASE ELECTRIC SUPPLY CO.							
	I-5665-1058824	Electrical Hardware Stock - EM	R	11/20/2024	1,455.61		054368		1,455.61
03044		Amazon Capital Services							
	I-1316-P3K3-M6X6	First Aid Kit - MAINT	R	11/20/2024	65.42		054369		
	I-13Q4-FM64-VN4F	Wireless Access Point - WP	R	11/20/2024	85.79		054369		
	I-149G-3NYM-J1RH	Survey Stakes - MAINT	R	11/20/2024	191.72		054369		
	I-14Q1-QVKG-RRHN	Tool Box Organizer - TP	R	11/20/2024	343.03		054369		
	I-171Q-64XD-H63M	Air Filter Light Tower - 123	R	11/20/2024	70.43		054369		
	I-17JK-C7N6-V7DW	Wireless Access Point - LCRA	R	11/20/2024	85.79		054369		
	I-17XH-7GFV-CDLH	Survey Stakes - MAINT	R	11/20/2024	99.40		054369		

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	I-19MF-FDXT-MFX9	First Aid Kit - MAINT	R	11/20/2024	65.42		054369		
	I-19XG-GFWC-MCY1	First Aid Kit - MAINT	R	11/20/2024	65.42		054369		
	I-1GGW-H9KL-MCW6	Gloves - UT	R	11/20/2024	96.25		054369		
	I-1GGW-H9KL-MHQD	Privacy Screen Fence - LCRA	R	11/20/2024	53.60		054369		
	I-1M7F-Y6MR-LX4K	First Aid Kit - MAINT	R	11/20/2024	65.42		054369		
	I-1NKQ-FLHP-HFCC	V-Jaw tongues & Groove Pilers	R	11/20/2024	32.06		054369		
	I-1R73-HM4R-MFFF	First Aid Kit - MAINT	R	11/20/2024	65.42		054369		
	I-1VWM-9MRR-VKHJ	Wireless Access Point - LCRA	R	11/20/2024	85.79		054369		
	I-1XT9-1DD6-3VL9	Ear Plugs - LCRA	R	11/20/2024	23.98		054369		1,494.94
06060		Ameriflex							
	I-INV779174	FSA Admin Fee	R	11/20/2024	80.00		054371		80.00
00014		AQUA-FLO SUPPLY							
	I-SI2431354	Fitings - LCRA	R	11/20/2024	20.80		054372		20.80
00018		AT & T MOBILITY							
	I-287327817962X1124	Acct#287327817962	R	11/20/2024	36.42		054373		36.42
03429		AT&T							
	I-5140235905	Acct#8310011246015	R	11/20/2024	2,222.27		054374		2,222.27
00030		B&R TOOL AND SUPPLY CO							
	I-1901007151	Polishing Pads Kit - WP	R	11/20/2024	144.26		054375		
	I-1901007363	U Channel Post - MAINT	R	11/20/2024	2,182.11		054375		
	I-1901007395	Cutting Torch Tip - UT	R	11/20/2024	45.94		054375		2,372.31
03702		Cannon Corporation							
	I-90248	V-SB Intertie Design Service	R	11/20/2024	89,107.23		054376		89,107.23
00277		Capital Industrial Medical Suu							
	I-103428	First Aid Kits - SAFE	R	11/20/2024	1,327.73		054377		
	I-103441	First Aid Kits - SAFE	R	11/20/2024	987.47		054377		
	I-103442	First Aid Kits - SAFE	R	11/20/2024	349.44		054377		
	I-103443	First Aid Kits - SAFE	R	11/20/2024	401.80		054377		3,066.44
05712		Caterpillar Financial Services							
	I-36124162	Mini Excavator - GARAGE	R	11/20/2024	23,075.85		054378		23,075.85
00058		COAST TO COAST							
	I-54083	Tool Oil Blades - MAINT	R	11/20/2024	40.20		054379		
	I-54085	VP Fuel - LCRA	R	11/20/2024	30.71		054379		70.91

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00511		Community Memorial Health Cent							
	I-121140	Drug Screening - LCRA	R	11/20/2024	100.00		054380		100.00
00719		CORELOGIC INFORMATION SOLUTION							
	I-82227453	Realquest Subscription	R	11/20/2024	137.50		054381		137.50
02722		D&H Water Systems							
	I-I2024-1440	100 & 500lb/Day Chlorinator	R	11/20/2024	11,793.57		054382		
	I-I2024-1507	Rivo Controller - TP	R	11/20/2024	3,176.34		054382		14,969.91
02480		David Taussig & Associates, In							
	I-2410118	D23-00115 CFD Tax Admin	R	11/20/2024	1,126.00		054383		1,126.00
00740		DELL MARKETING L.P.							
	I-10781928144	Optiplex Small Form Factorplus	R	11/20/2024	2,484.33		054384		
	I-10781928152	Optiplex Samll Form Factorplus	R	11/20/2024	1,242.17		054384		
	I-10781928160	Optiplex Small Form Factorplus	R	11/20/2024	1,114.55		054384		
	I-10781928179	Optiplex Small Form Factoplus	R	11/20/2024	1,114.55		054384		
	I-10782790361	Precision 3280 Compact Workstn	R	11/20/2024	5,446.50		054384		11,402.10
02544		Department of Justice							
	I-776077	Fingerprinting - LCRA	R	11/20/2024	32.00		054385		32.00
06008		Docu Products							
	I-295715	Copier Usage - DO	R	11/20/2024	204.14		054386		204.14
05992		E Source Companies LLC							
	I-12602	Water loss Audit Validation	R	11/20/2024	3,300.00		054387		3,300.00
00086		E.J. Harrison & Sons Inc							
	I-1498	Acct#500546088	R	11/20/2024	1,390.57		054388		1,390.57
00086		E.J. Harrison & Sons Inc							
	I-830	Acct#500766090	R	11/20/2024	62.00		054389		62.00
06108		EMCOR Service Mesa Energy							
	I-911015330	AC Repair - LCRA	R	11/20/2024	606.00		054390		606.00
01288		ENVIRONMENTAL SYSTEMS							
	I-94835842	ArcGIS Annual 30 User Licence	R	11/20/2024	7,750.00		054391		
	I-94835843	GIS Agmt Sofware/Maint	R	11/20/2024	11,000.00		054391		18,750.00
00091		ERNST & YOUNG LLP							
	I-US01U001628325	Client#0012205436	R	11/20/2024	1,502.00		054392		
	I-US01U001676242	Client#0012205436	R	11/20/2024	1,502.00		054392		3,004.00

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00095		FAMCON PIPE & SUPPLY							
	I-S100140718.001	FlgXFlg & MJXFlg Muller 6" Val	R	11/20/2024	2,179.05		054393		
	I-S100140719.001	Kinger 8" Flanged Gate Valve	R	11/20/2024	3,029.81		054393		5,208.86
00093		FEDERAL EXPRESS							
	I-8-676-30226	Shipping - LAB	R	11/20/2024	45.73		054394		45.73
00099		FGL ENVIRONMENTAL							
	I-417795A	Nitrate Monitoring 10/29/24	R	11/20/2024	67.00		054395		
	I-418204A	Nitrate Monitoring 11/05/24	R	11/20/2024	89.00		054395		156.00
00101		FISHER SCIENTIFIC							
	I-6898995	Autocable Tape, MaConkey - LAB	R	11/20/2024	67.08		054396		67.08
02217		Greg Rents							
	I-67441-1	Concrete Mix & Mixer - LCRA	R	11/20/2024	668.43		054397		
	I-67513-1	Concrete mix & Mixer - LCRA	R	11/20/2024	1,408.46		054397		2,076.89
02940		Holliday Rock Co, Inc.							
	I-1696070	2500psi 1" Place Only - LCRA	R	11/20/2024	1,607.15		054398		1,607.15
00596		HOME DEPOT							
	I-3920129	Top Rails for Chain Link Fence	R	11/20/2024	1,179.92		054399		
	I-4199777	48X50 Black Chain Link Fence	R	11/20/2024	992.47		054399		
	I-4813545	Office Supplies/Tools - TP	R	11/20/2024	390.40		054399		
	I-4833891	Grinder, sAWZALL & Battery -UT	R	11/20/2024	426.86		054399		
	I-6901525	Cement Pallets - PL	R	11/20/2024	1,559.15		054399		4,548.80
00894		HOSE-MAN, INC.							
	I-00082366	Adapter & Hydrailic Assembly	R	11/20/2024	230.65		054400		230.65
00127		INDUSTRIAL BOLT & SUPPLY							
	I-258445-1	Hex Cap & Bolt Gauge - TP	R	11/20/2024	47.24		054401		47.24
02565		Industrial Networking Solution							
	I-INV-1674025	Cradlepoint 1-Yr Renewal	R	11/20/2024	900.90		054402		900.90
05799		Jack Henry & Associates Inc.							
	I-4800111	RemitPlus Express - ADM	R	11/20/2024	250.00		054403		250.00
05744		Kear Groundwater							
	I-3496	Hydrogeologic Sevice - ENG	R	11/20/2024	990.00		054404		
	I-3519	Pro Hydro Well Design Matilija	R	11/20/2024	12,375.00		054404		13,365.00

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00667		Kennedy/Jenks Consultants, Inc							
	I-175651	DBP Reduction Fat Pipe - ENG	R	11/20/2024	5,598.75		054405		5,598.75
00145		MAGNUM FENCE & SECURITY, INC.							
	I-6365	Roll of Galbanized Chainlink	R	11/20/2024	538.75		054406		538.75
00151		MEINERS OAKS ACE HARDWARE							
	C-098188	Mini Mats Return - LCRA	R	11/20/2024	160.77CR		054407		
	C-099024	Grade Stake Return - LCRA	R	11/20/2024	8.88CR		054407		
	I-097529	Concrete Broom, Bolts & Screws	R	11/20/2024	119.22		054407		
	I-097593	Mini Mats - LCRA	R	11/20/2024	48.23		054407		
	I-097751	Flat Washer & Sinker - LCRA	R	11/20/2024	24.11		054407		
	I-097778	Hex Nut - LCRA	R	11/20/2024	11.25		054407		
	I-098131	Elbo 90 & Couplings - LCRA	R	11/20/2024	22.47		054407		
	I-098183	Mini Mats - LCRA	R	11/20/2024	225.07		054407		
	I-098229	Dryconcrete Mix - LCRA	R	11/20/2024	50.77		054407		
	I-098305	Fence Posts - LCRA	R	11/20/2024	52.68		054407		
	I-098333	Wire, Bolts & Screws - LCRA	R	11/20/2024	163.25		054407		
	I-098344	LED Liner Lamp - LCRA	R	11/20/2024	19.51		054407		
	I-098396	Tray Liners & Roller Cover - L	R	11/20/2024	32.37		054407		
	I-098402	WD Screws & Mask Sanding - LCR	R	11/20/2024	90.37		054407		
	I-098572	Paint & Level - LCRA	R	11/20/2024	324.64		054407		
	I-098867	Leader Hose & Valve Float - PL	R	11/20/2024	91.85		054407		
	I-098890	Blade Tree Pruner & PVC Cement	R	11/20/2024	55.90		054407		
	I-098927	Faucet, Nipple & PVC Cap - LCR	R	11/20/2024	286.09		054407		
	I-098941	Conn Wire & Tester - WP	R	11/20/2024	22.60		054407		
	I-099002	Wood Grade - MAINT	R	11/20/2024	152.59		054407		
	I-099023	Primer Sealer - LCRA	R	11/20/2024	121.42		054407		
	I-099027	Mini Mats - LCRA	R	11/20/2024	141.11		054407		
	I-099052	Construction Adhesive - LCRA	R	11/20/2024	155.16		054407		
	I-099107	Regular Cement - LCRA	R	11/20/2024	102.90		054407		
	I-099108	Cement - LCRA	R	11/20/2024	85.75		054407		
	I-099195	VP Fuel & Air Filter - LCRA	R	11/20/2024	47.80		054407		
	I-099208	Cleaning Supplies - LCRA	R	11/20/2024	36.63		054407		
	I-099256	Bolts & Screws - LCRA	R	11/20/2024	0.53		054407		
	I-099291	Screws & Mlw T25 Bit 2" - LCRA	R	11/20/2024	15.73		054407		
	I-099292	Sump Pumps & Adapter - PL	R	11/20/2024	142.46		054407		
	I-099295	Adapter, Elbow 90 & PVC Pipe	R	11/20/2024	16.60		054407		
	I-099325	Mask Sanding - LCRA	R	11/20/2024	21.46		054407		
	I-099465	Hose Nozle & Arnold Throttle	R	11/20/2024	38.58		054407		
	I-099549	Duck Tape, Painter Tape & Glue	R	11/20/2024	56.30		054407		2,605.75
01570		Ojai Auto Supply							
	C-606285	Alternator Return - Unit 13	R	11/20/2024	164.98CR		054410		
	C-606542	M/C Cap Return - UT	R	11/20/2024	7.45CR		054410		
	I-604538	Antifreeze - Unit 28	R	11/20/2024	75.08		054410		
	I-605096	Gorila Tape & Head Gasket & Bl	R	11/20/2024	44.21		054410		
	I-606193	Coolant Recovery Kit - LCRA	R	11/20/2024	31.79		054410		

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	I-606231	Battery - Unit 13	R	11/20/2024	136.20		054410		
	I-606233	Alternator - Unit 13	R	11/20/2024	164.98		054410		
	I-606375	Cooling System Antifreeze - Un	R	11/20/2024	10.71		054410		
	I-606455	Cylinder Caps - UT	R	11/20/2024	7.45		054410		
	I-606540	Car Air Freshener - UT	R	11/20/2024	3.22		054410		
	I-606592	Spark Plug - LCRA	R	11/20/2024	2.32		054410		
	I-606598	Eng Spark Plug - LCRA	R	11/20/2024	2.32		054410		305.85
00165		OJAI LUMBER CO, INC							
	C-2411-814458	Terminal Post - LCRA	R	11/20/2024	95.53CR		054411		
	I-2410-813179	Treated Douglas Fir - LCRA	R	11/20/2024	815.12		054411		
	I-2410-813307	Wire Mesh Mat - LCRA	R	11/20/2024	168.00		054411		
	I-2411-813849	Lumber - LCRA	R	11/20/2024	176.40		054411		
	I-2411-814136	18" Flat Steel Form Stake - LC	R	11/20/2024	256.84		054411		
	I-2411-814280	Fence Post & Wire Mesh Mat - L	R	11/20/2024	384.29		054411		
	I-2411-814452	Terminal Post - LCRA	R	11/20/2024	222.90		054411		
	I-2411-814795	Line Post & Spray Paint - LCRA	R	11/20/2024	445.34		054411		2,373.36
06310		Pacific Coatings LLC							
	I-1028	Robles Canal Crack Sealing -EN	R	11/20/2024	138,600.00		054412		138,600.00
05713		Pops Auto Repair							
	I-0600	Smog Check - Unit 10	R	11/20/2024	80.00		054413		
	I-0601	Smog Check - Unit 80	R	11/20/2024	80.00		054413		
	I-0602	Smog Check - Unit E07	R	11/20/2024	80.00		054413		
	I-0606	Smog Check - Unit 13	R	11/20/2024	80.00		054413		
	I-0608	Smog Check - Unit 59	R	11/20/2024	80.00		054413		
	I-0614	Smog Check - Unit E05	R	11/20/2024	80.00		054413		
	I-0615	Smog Check - Unit 75	R	11/20/2024	80.00		054413		
	I-0617	Smog Check - Unit 45	R	11/20/2024	80.00		054413		
	I-0618	Smog Check - Unit 55	R	11/20/2024	80.00		054413		
	I-0621	Smog Check - Unit 29	R	11/20/2024	80.00		054413		
	I-0622	Smog Check - Unit 11	R	11/20/2024	80.00		054413		
	I-0628	Smog Check - Unit 16	R	11/20/2024	80.00		054413		
	I-0631	Smog Check - Unit 31	R	11/20/2024	80.00		054413		
	I-0633	Smog Check - Unit 39	R	11/20/2024	80.00		054413		
	I-0636	Smog Check - Unit 41	R	11/20/2024	80.00		054413		
	I-0639	Lights Instalation - Unit E11	R	11/20/2024	950.00		054413		
	I-0640	Compleate Service on Engine	R	11/20/2024	950.00		054413		
	I-0641	Service Honda Motor - Unit 315	R	11/20/2024	750.00		054413		
	I-0642	Smog Check - Unit 18	R	11/20/2024	80.00		054413		
	I-0645	Smog Check - Unit 51	R	11/20/2024	80.00		054413		4,010.00

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00790		PROFORMA							
	I-BI85013816A	Embroidered on Hats - EM	R	11/20/2024	147.66		054415		
	I-BI85013817A	Enbroidery On Jackets - UT	R	11/20/2024	63.06		054415		210.72
01114		Quality Equipment & Spray							
	I-468495	Elec Reel & Flextral Hose - Un	R	11/20/2024	1,496.07		054416		1,496.07
00306		Rincon Consultants, Inc.							
	I-60990	Ven-SB Intertie NEPA	R	11/20/2024	13,433.59		054417		
	I-61240	Robles Maintenace Support	R	11/20/2024	5,038.75		054417		18,472.34
02756		SC Fuels							
	I-IN-0000004254	Gas & Diesel - DO	R	11/20/2024	6,481.89		054418		6,481.89
06091		RedNova Labs, Inc.							
	I-1171321	StorEDGE FMS/Website Pro	R	11/20/2024	157.50		054419		157.50
01696		SUPERIOR MACHINE							
	I-5467	Bore & Broach Couplings - TP	R	11/20/2024	888.94		054420		888.94
01959		The Wharf							
	I-300461	Safety Boot - LCRA	R	11/20/2024	100.00		054421		
	I-313755	Jacket - UT	R	11/20/2024	125.10		054421		
	I-315817	Work Pants - EM	R	11/20/2024	167.96		054421		393.06
02854		Water Works Engineers, LLC							
	I-15483	Ven-SB Counties Design - ENG	R	11/20/2024	117,588.80		054422		117,588.80
00663		WAXIE SANITARY SUPPLY							
	I-82850643	Broom - LCRA	R	11/20/2024	48.48		054423		48.48
00433		WIENHOFF DRUG TESTING							
	I-125482	Annual Consortium Fee	R	11/20/2024	850.00		054424		850.00
00010		AIRGAS USA LLC							
	I-9155599970	Tip Ctng Victor - UT	R	11/27/2024	15.73		054425		15.73
00693		ALL THE KINGS FLAGS							
	I-33244-2	Flags - LCRA	R	11/27/2024	384.76		054426		384.76
00012		ALL-PHASE ELECTRIC SUPPLY CO.							
	I-5665-1058937	3H Flat Ang Plate - EM	R	11/27/2024	51.69		054427		51.69

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03044		Amazon Capital Services							
	C-111X-GJRM-7FGF	Soap Dispenser - MAINT	R	11/27/2024	54.72CR		054428		
	C-1PVW-G7HM-79TC	Soap Dispenser - MAINT	R	11/27/2024	54.72CR		054428		
	I-1933-MF7J-KDLW	Cash Register Roller & Masking	R	11/27/2024	217.20		054428		
	I-1CPY-GJX3-V33J	Disposable Gloves - PL	R	11/27/2024	113.70		054428		
	I-1JDJ-71VX-TDFY	Tire Wet Foam - PL	R	11/27/2024	64.84		054428		
	I-1KDP-NQFK-1XY9	Safety Vest & Cash Bags - LCRA	R	11/27/2024	55.72		054428		
	I-1LXQ-G3P4-9HD9	Soap Dispenser - MAINT	R	11/27/2024	109.44		054428		
	I-1NL6-T76H-3QV7	Cables Speaker Wire - WP	R	11/27/2024	231.64		054428		
	I-1TPW-94FL-VFM1	Car Interior Detail Cleaner-PL	R	11/27/2024	65.04		054428		748.14
00836		AMERICAN RED CROSS							
	I-22739084	First Aid/CPR/AED Training	R	11/27/2024	912.00		054429		912.00
00014		AQUA-FLO SUPPLY							
	I-SI2419255	PVC Pipe & Fitting - PL	R	11/27/2024	2,120.96		054430		
	I-SI2434990	MDPE Gas Pipe - PL	R	11/27/2024	66.21		054430		
	I-SI2435012	Pump-Down Float Switch - TP	R	11/27/2024	96.10		054430		2,283.27
00840		AQUA-METRIC SALES COMPANY							
	I-INV0105077	4" C2 Omni Meter - UT	R	11/27/2024	14,618.56		054431		14,618.56
01666		AT & T							
	I-000022648835	Acct#9391062398	R	11/27/2024	372.67		054432		372.67
03429		AT&T							
	I-8723485905	Acct#8310014476685	R	11/27/2024	2,664.12		054433		2,664.12
00030		B&R TOOL AND SUPPLY CO							
	I-1901007546	Jack Hammer Parts - MAINT	R	11/27/2024	710.18		054434		
	I-1901007596	Erosion Control Blanket - MAIN	R	11/27/2024	1,505.79		054434		2,215.97
00679		BAKERSFIELD PIPE & SUPPLY INC							
	I-S3180180.001	Ball Valve, Gloves & SS Nipple	R	11/27/2024	220.54		054435		
	I-S3180261.001	Teflon Tape, WD40 Spray - PL	R	11/27/2024	763.73		054435		984.27
04111		Roadpost, Inc.							
	I-BU01736086	Sat Phone Service - TP	R	11/27/2024	66.95		054436		66.95
00207		CA Department of Tax & Fee Adm							
	I-L0028709283	Water Rights - A011311	R	11/27/2024	864.80		054437		
	I-L0028765180	Water Rights - A015998	R	11/27/2024	13,284.80		054437		14,149.60

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00055		CASITAS BOAT RENTALS							
	I-001666	Pontoon Usage 10/24	R	11/27/2024	810.00		054438		810.00
06004		Catalina Paints							
	I-OJ027182	Gloss-4X Base - LCRA	R	11/27/2024	334.20		054439		334.20
02322		Coast Cart, Inc.							
	I-28246	Service on TXT Gas - Unit EZ 5	R	11/27/2024	143.59		054440		143.59
01843		COASTAL COPY							
	I-1130988	Copier Usage - LCRA	R	11/27/2024	177.25		054441		177.25
00062		CONSOLIDATED ELECTRICAL							
	I-9009-1052799	60A Safety Sw & Clampon - LAB	R	11/27/2024	143.66		054442		143.66
03756		County Fire Protection							
	I-24-31167	Fire Extinguishers Service	R	11/27/2024	1,172.98		054443		
	I-24-31168	Fire Extinguishers Service	R	11/27/2024	598.75		054443		
	I-24-31169	Fire Extinguishers Service	R	11/27/2024	2,008.18		054443		3,779.91
00740		DELL MARKETING L.P.							
	I-10783042106	Precision 3680 Tower Workstn	R	11/27/2024	1,586.77		054444		1,586.77
00086		E.J. Harrison & Sons Inc							
	I-111424	Acct#1C00054230	R	11/27/2024	3,982.67		054445		3,982.67
00086		E.J. Harrison & Sons Inc							
	I-111424a	Acct#102258843	R	11/27/2024	325.99		054446		325.99
00086		E.J. Harrison & Sons Inc							
	I-111424b	Acct#1C00053370	R	11/27/2024	318.40		054447		318.40
00099		FGL ENVIRONMENTAL							
	I-417796A	Plant Efluent DBP 10/29/24	R	11/27/2024	285.00		054448		
	I-418641A	Nitrate Monitoring 11/12/24	R	11/27/2024	67.00		054448		352.00
00115		GRAINGER, INC							
	I-9304681506	Manual Grease Gun - FISH	R	11/27/2024	47.43		054449		
	I-9318698116	Rain Boots - TP	R	11/27/2024	168.01		054449		215.44
02217		Greg Rents							
	I-66511-1	Hilti Te - WP	R	11/27/2024	162.47		054450		
	I-67151-1	Hilti Te - WP	R	11/27/2024	182.39		054450		344.86

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04022		Hamner, Jewell & Associates							
	I-204149	Ventura-SB Row Srvs - ENG	R	11/27/2024	231.25		054451		231.25
00894		HOSE-MAN, INC.							
	I-00083182	Hydraulic Assembly - Unit 109	R	11/27/2024	128.14		054452		128.14
00127		INDUSTRIAL BOLT & SUPPLY							
	I-258814-0	Gloves, Washer & Hex Nut - EM	R	11/27/2024	98.66		054453		98.66
05891		Ixom Watercare Inc							
	I-6885302	Submersible Mixer - LAB	R	11/27/2024	24,595.47		054454		24,595.47
00151		MEINERS OAKS ACE HARDWARE							
	I-093592	PVC Cutter Ratcheting - MAINT	R	11/27/2024	13.62		054455		
	I-096187	Cement - PL	R	11/27/2024	137.19		054455		
	I-097754	Roller & Acetone - WP	R	11/27/2024	35.66		054455		
	I-098994	Hole Saw & Utility Knife - PL	R	11/27/2024	72.17		054455		
	I-099502	EMC Cleaning Supplies - EM	R	11/27/2024	195.90		054455		
	I-099524	JB Epoxy Syrng & Bolts - FISH	R	11/27/2024	18.82		054455		
	I-099565	Cement Roof & Coupling House	R	11/27/2024	146.65		054455		
	I-099632	Concrete Mix - LCRA	R	11/27/2024	134.93		054455		
	I-099731	Spray Paint - LCRA	R	11/27/2024	220.55		054455		
	I-099859	Screws, Washer & Angle Steel	R	11/27/2024	114.21		054455		
	I-099880	Paint - LCRA	R	11/27/2024	152.65		054455		
	I-099907	Diesel Exhaust Fluid & Spray P	R	11/27/2024	81.18		054455		
	I-099908	Carr Screw & Hex Nut - LCRA	R	11/27/2024	83.61		054455		
	I-099935	Split Bolt Connector - LCRA	R	11/27/2024	18.73		054455		
	I-099937	Blue Trap & Rubber Paste - TP	R	11/27/2024	73.73		054455		
	I-099958	Electric Tape & Screw Bolt - L	R	11/27/2024	46.18		054455		
	I-100008	Drill Bit Set & Combo Lock - L	R	11/27/2024	148.80		054455		1,694.58
03444		Mission Linen Supply							
	I-522722954	Uniform Pants - TP	R	11/27/2024	40.00		054457		
	I-522780186	Uniform Pants - PL	R	11/27/2024	46.79		054457		
	I-522780187	Uniform Pants - MAINT	R	11/27/2024	28.13		054457		
	I-522780190	Uniform Pants - TP	R	11/27/2024	53.41		054457		168.33
00165		OJAI LUMBER CO, INC							
	I-2410-811247	Sand Bags & Doug Fir - PL	R	11/27/2024	55.25		054458		
	I-2411-816443	SFL Adhesive - LCRA	R	11/27/2024	809.91		054458		
	I-2411-816972	Tension Band & Tension Bar - L	R	11/27/2024	31.72		054458		896.88
00169		OJAI VALLEY SANITARY DISTRICT							
	I-26630	Cust# 99991 10/24	R	11/27/2024	2,625.57		054459		2,625.57

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01627		OSCAR'S TREE SERVICE							
	I-63598	Hazard Reduction Trimming - LC	R	11/27/2024	11,200.00		054460		11,200.00
00790		PROFORMA							
	I-BI85013567A	Uniform Shirts & Hoodies - LAB	R	11/27/2024	549.29		054461		549.29
00405		R.J. THOMAS MFG. CO.,INC.							
	I-275176	Fire Pits & BBQs - LCRA	R	11/27/2024	11,841.25		054462		11,841.25
00215		SOUTHERN CALIFORNIA EDISON							
	I-112024a	Acct#700625798978	R	11/27/2024	442.75		054463		
	I-112024b	Acct#700533992421	R	11/27/2024	29,624.45		054463		
	I-112224a	Acct#700356078152	R	11/27/2024	194.37		054463		
	I-112224b	Acct#700237081885	R	11/27/2024	802.15		054463		31,063.72
00216		Southern California Gas Co.							
	I-112424a	Acct#18231433006	R	11/27/2024	28.16		054464		
	I-112624b	Acct#00801443003	R	11/27/2024	685.73		054464		713.89
00825		USA BLUEBOOK							
	I-INV00547111	Buffer 8.00, 6.0 & Nitite Chem	R	11/27/2024	501.62		054465		501.62
06322		Gloria Valdez							
	I-01-00089165	Camping Cancellation - LCRA	R	11/27/2024	169.00		054466		169.00
00257		VENTURA RIVER WATER DISTRICT							
	I-113024	Acct#5-37500A	R	11/27/2024	292.80		054467		292.80
03758		County of Ventura - Fleet Serv							
	I-9117-2410	Fleet Service - Unit 104, 114	R	11/27/2024	10,760.24		054468		10,760.24
00663		WAXIE SANITARY SUPPLY							
	I-82863131	Janitorial Supplies - LCRA	R	11/27/2024	1,229.17		054469		
	I-82878333	Janitorial Supplies - LCRA	R	11/27/2024	1,015.66		054469		2,244.83
00330		WHITE CAP CONSTRUCTION SUPPLY							
	I-10020842969	Cord Ear Plugs & 2" Bit - PL	R	11/27/2024	447.34		054470		447.34
06056		Ameriflex							
	I-DPC202411252356	Dependant Care	R	11/27/2024	461.54		054471		
	I-FSA202411252356	FSA Deduction	R	11/27/2024	1,186.44		054471		1,647.98
00102		FRANCHISE TAX BOARD							
	I-G09202411252356	Payroll Deduction	R	11/27/2024	250.00		054472		250.00

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03044		Amazon Capital Services							
	I-16NW-447J-YY9F	Protectant Coating for Interio	R	12/04/2024	87.37		054473		
	I-1J1M-QJH7-K47M	Portable Heater - MIANT	R	12/04/2024	164.08		054473		
	I-1JLC-Q74N-3CFR	Bolt Cutter - MAINT	R	12/04/2024	114.32		054473		
	I-1JRW-7WYC-WMXJ	WD-40 - PL	R	12/04/2024	98.84		054473		
	I-1M9M-7XMR-RD73	Hammer Drive Anchor - ENG	R	12/04/2024	50.38		054473		
	I-1QQX-MYXW-LT14	Starting Fluid - PL	R	12/04/2024	51.48		054473		
	I-1TWF-G7GJ-M37G	Black Satin Tire Coating - PL	R	12/04/2024	139.40		054473		
	I-1WF7-XF3T-37X4	Laptop Memoty Card - EM	R	12/04/2024	218.76		054473		
	I-1XTV-G6RN-14XN	Torque Wrenches - MAINT	R	12/04/2024	73.67		054473		998.30
01602		ANGELUS BLOCK CO., INC.							
	I-VT00348596	Planter Wall - LCRA	R	12/04/2024	325.29		054474		325.29
00014		AQUA-FLO SUPPLY							
	I-SI2439056	3" PVC Pipe & 90 Ell - LCRA	R	12/04/2024	593.74		054475		593.74
01666		AT & T							
	I-000022650790	Acct#9391064013	R	12/04/2024	30.65		054476		30.65
00021		AWA OF VENTURA COUNTY							
	I-06-16028	WaterWise Breakfast Series	R	12/04/2024	160.00		054477		160.00
00679		BAKERSFIELD PIPE & SUPPLY INC							
	I-S3183307.001	RF Flange, Window Cleaner - PL	R	12/04/2024	150.07		054478		150.07
05995		Canon Financial Services							
	I-36200419	Copier Rental - ADM	R	12/04/2024	233.11		054479		233.11
06004		Catalina Paints							
	I-OJ027200	Paint - TP	R	12/04/2024	207.07		054480		207.07
00117		CERTEX USA, INC							
	I-10824721-00	SGL-Leg G70 Chain - MAINT	R	12/04/2024	148.41		054481		148.41
06266		Cushman Contracting Corporatio							
	I-102324b	MWPF Meter & DBP - ENG	R	12/04/2024	21,653.25		054482		21,653.25
00740		DELL MARKETING L.P.							
	I-10782406610	Optiplex Small Form Factor -WP	R	12/04/2024	1,114.55		054483		1,114.55
06127		Dion & Sons, Inc							
	I-SP26540	Gas - LCRA	R	12/04/2024	2,232.20		054484		
	I-SP26541	Diesel - LCRA	R	12/04/2024	2,034.73		054484		4,266.93

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00086		E.J. Harrison & Sons Inc							
	I-111424c	Acct#1C00054240	R	12/04/2024	506.09		054485		506.09
00093		FEDERAL EXPRESS							
	I-8-689-72002	Shipping - LAB	R	12/04/2024	43.29		054486		43.29
00099		FGL ENVIRONMENTAL							
	I-418202A	OWS-San Antonio TP - Mn	R	12/04/2024	24.00		054487		
	I-418203A	OWS-San Antonio TP - Mn	R	12/04/2024	43.00		054487		
	I-418205A	Lab Water Quality 10/30/24	R	12/04/2024	68.00		054487		
	I-418206A	THM/HAA Monitoring-Stage 2	R	12/04/2024	999.00		054487		
	I-419031A	Nitrate Monitoring 11/19/24	R	12/04/2024	67.00		054487		1,201.00
00101		FISHER SCIENTIFIC							
	I-7214132	Lab Soap - LAB	R	12/04/2024	86.01		054488		86.01
02217		Greg Rents							
	I-67763-1	Concrete Mix & Cart Mixer - LC	R	12/04/2024	1,011.63		054489		
	I-68291-1	Propane - Unit 242	R	12/04/2024	94.72		054489		1,106.35
00596		HOME DEPOT							
	I-5391597	Black Fence Post - LCRA	R	12/04/2024	336.68		054490		
	I-5620039	Transfer Pump & Raheting Tap S	R	12/04/2024	1,033.39		054490		
	I-6771937	Sawzall - EM	R	12/04/2024	142.41		054490		1,512.48
09910		J.W. ENTERPRISES							
	I-386600	CT Pumping - 4M PP	R	12/04/2024	82.75		054491		
	I-386601	CT Pumping - GRAND AVE PUMP	R	12/04/2024	82.75		054491		
	I-386602	CT Pumping - SA PLANT	R	12/04/2024	165.50		054491		
	I-386603	CT Pumping - 3M PUMP	R	12/04/2024	82.75		054491		
	I-386604	CT Pumping - FAIRVIEW RES.	R	12/04/2024	82.75		054491		
	I-386605	CT Pumping - CASITAS DAM	R	12/04/2024	82.75		054491		
	I-386606	CT Pumping - BATES RES.	R	12/04/2024	82.75		054491		
	I-386607	CT Pumping - GRAND AVE.	R	12/04/2024	80.50		054491		742.50
06323		JEAMAR USA, LLC							
	C-0000033416b	Accrue Use Tax	R	12/04/2024	284.51CR		054492		
	D-0000033416a	Accrue Use Tax	R	12/04/2024	284.51		054492		
	I-0000033416	Sheave-Roll Formed - PL	R	12/04/2024	3,924.34		054492		3,924.34
05449		Matheson Tri-Gas, Inc.							
	I-0030679512	Liquid Oxygen - TP	R	12/04/2024	5,569.00		054493		5,569.00

VENDOR SET: 01 Casitas Municipal Water D
BANK: AP ACCOUNTS PAYABLE
DATE RANGE:11/07/2024 THRU 12/04/2024

VENDOR	I.D.	NAME	STATUS	CHECK DATE	INVOICE AMOUNT	DISCOUNT	CHECK NO	CHECK STATUS	CHECK AMOUNT
00151		MEINERS OAKS ACE HARDWARE							
	I-096082	12" Flat Steel Stake - LCRA	R	12/04/2024	142.27		054494		
	I-100078	12X24 Blue Tarp - LCRA	R	12/04/2024	38.05		054494		
	I-100181	Electric Tape & Connector - LC	R	12/04/2024	15.58		054494		
	I-100332	Bolts & Screws - PL	R	12/04/2024	4.46		054494		
	I-100363	Paint - LCRA	R	12/04/2024	87.26		054494		
	I-100400	Hx Bolts & Angle - WP	R	12/04/2024	58.24		054494		
	I-100499	Flat Washer, PVC Cement & Bolt	R	12/04/2024	48.04		054494		
	I-100526	Bolts & Screws - LCRA	R	12/04/2024	5.96		054494		
	I-100561	Hooks - LCRA	R	12/04/2024	8.30		054494		408.16
03444		Mission Linen Supply							
	I-522827461	Uniform Pants - PL	R	12/04/2024	46.79		054495		
	I-522827462	Uniform Pants - MAINT	R	12/04/2024	28.13		054495		
	I-522827465	Uniform Pants - TP	R	12/04/2024	53.41		054495		128.33
03508		NTT Industrial Supply, Inc.							
	I-25964	Coupling - MAINT	R	12/04/2024	23.68		054496		23.68
05994		NV5, Inc							
	I-416753	DBP Testing Service - ENG	R	12/04/2024	9,148.00		054497		9,148.00
05977		ODP Business Solutions, LLC							
	I-394496257001	Office Supplies - ADM	R	12/04/2024	111.14		054498		111.14
01570		Ojai Auto Supply							
	C-607479	Battery Return - PL	R	12/04/2024	323.41CR		054499		
	I-607412	Battery - PL	R	12/04/2024	323.41		054499		
	I-607632	Prestone Bug Wash - UT	R	12/04/2024	11.88		054499		
	I-607704	Engine Brite Cleaner - LCRA	R	12/04/2024	56.16		054499		68.04
00165		OJAI LUMBER CO, INC							
	I-2411-817653	Fence Post & Mic Concrete - LC	R	12/04/2024	44.05		054500		44.05
00169		OJAI VALLEY SANITARY DISTRICT							
	I-111924	CY 2025 Permit Fee NSNC-010	R	12/04/2024	4,914.00		054501		4,914.00
00169		OJAI VALLEY SANITARY DISTRICT							
	I-26709	Cus#52921	R	12/04/2024	61.67		054502		61.67
01109		SALVADOR LOERA TRANSPORTATION							
	I-15393	Fill Sand Mutual Yard - PL	R	12/04/2024	719.72		054503		
	I-15394	Fill Sand Mutual Yard - PL	R	12/04/2024	719.72		054503		
	I-15491	Base - LCRA	R	12/04/2024	912.07		054503		
	I-15492	DG - LCRA	R	12/04/2024	1,350.00		054503		
	I-15493	Base - LCRA	R	12/04/2024	908.00		054503		
	I-15495	3/4 Rock Mutual Yard - PL	R	12/04/2024	721.58		054503		
	I-15496	Fill Sand Mutual Yard - PL	R	12/04/2024	721.58		054503		6,052.67

VENDOR SET: 01 Casitas Municipal Water D
BANK: AP ACCOUNTS PAYABLE
DATE RANGE:11/07/2024 THRU 12/04/2024

VENDOR	I.D.	NAME	STATUS	CHECK DATE	INVOICE AMOUNT	DISCOUNT	CHECK NO	CHECK STATUS	CHECK AMOUNT
06064		T-Mobile							
	I-113024	Acct#987771959	R	12/04/2024	31.15		054504		31.15
00225		UNDERGROUND SERVICE ALERT							
	I-1120240108	CAS01 New Ticket Charges	R	12/04/2024	209.80		054505		
	I-24-251609	Regulatory Cost - ENG	R	12/04/2024	95.12		054505		304.92
00246		VENTURA COUNTY AIR POLLUTION							
	I-120224	VCAPCD Permit Rincon Pump Plan	R	12/04/2024	450.00		054506		450.00
09955		VENTURA WHOLESALE ELECTRIC							
	I-320575	B-Line Spring Nut - WP	R	12/04/2024	138.51		054507		
	I-330357	Compression Lug & Split Bolt 1	R	12/04/2024	930.49		054507		1,069.00
00330		WHITE CAP CONSTRUCTION SUPPLY							
	I-50029353006	Sand Bags - MAINT	R	12/04/2024	320.68		054508		320.68
1		SPANO, CRAIG							
	I-000202411272357	US REFUND	R	12/04/2024	24.59		054509		24.59
1		SHANNON, REASON							
	I-000202411272358	US REFUND	R	12/04/2024	47.03		054510		47.03
1		COAST GRADING							
	I-000202411272361	US REFUND	R	12/04/2024	266.78		054511		266.78
1		RMR WATER TRUCKS							
	I-000202411272359	US REFUND	R	12/04/2024	248.39		054512		248.39
1		STANDARD DEMOLITION,							
	I-000202411272362	US REFUND	R	12/04/2024	405.74		054513		405.74
1		STAPLES CONTRUCTION							
	I-000202411272360	US REFUND	R	12/04/2024	238.91		054514		238.91
1		BROKAW, JOHN							
	I-000202411272364	US REFUND	R	12/04/2024	33.94		054515		33.94
1		GODDARD, DAVID							
	I-000202411272363	US REFUND	R	12/04/2024	14.32		054516		14.32

VENDOR SET: 01 Casitas Municipal Water D
BANK: AP ACCOUNTS PAYABLE
DATE RANGE:11/07/2024 THRU 12/04/2024

VENDOR I.D.	NAME	STATUS	CHECK DATE	INVOICE AMOUNT	DISCOUNT	CHECK NO	CHECK STATUS	CHECK AMOUNT

* * T O T A L S * *	NO		INVOICE AMOUNT	DISCOUNTS	CHECK AMOUNT
REGULAR CHECKS:	198		855,542.07	0.00	855,542.07
HAND CHECKS:	0		0.00	0.00	0.00
DRAFTS:	22		397,961.95	0.00	397,961.95
EFT:	0		0.00	0.00	0.00
NON CHECKS:	0		0.00	0.00	0.00
VOID CHECKS:	0	VOID DEBITS	0.00		
		VOID CREDITS	0.00	0.00	0.00

TOTAL ERRORS: 0

	NO	INVOICE AMOUNT	DISCOUNTS	CHECK AMOUNT
VENDOR SET: 01 BANK: AP TOTALS:	220	1,253,504.02	0.00	1,253,504.02
BANK: AP TOTALS:	220	1,253,504.02	0.00	1,253,504.02
REPORT TOTALS:	220	1,253,504.02	0.00	1,253,504.02

Void Check #54044 (117,588.80)

1,135,915.22

Adjudication Charge Fund Account

Publication of check register is in compliance with Section 53065.6 of the Government Code which requires the District to disclose reimbursements to employees and/or directors.

Adj. Checks: 000117-000119
Adj. Draft
Voids:

for Janyne Brown, Chief Financial Officer

VENDOR SET: 01 Casitas Municipal Water D
BANK: ADJ ADJUDICATION ACCOUNT
DATE RANGE:11/07/2024 THRU 12/04/2024

VENDOR	I.D.	NAME	STATUS	CHECK DATE	INVOICE AMOUNT	DISCOUNT	CHECK NO	CHECK STATUS	CHECK AMOUNT
05782		GSI Water Solutions, Inc							
	I-00888.002-9	Technical Consulting Service	R	11/13/2024	24,552.24		000117		24,552.24
06320		Marzulla Law,LLC							
	I-10149	SB Channelkeeper Adjudication	R	11/13/2024	437.50		000118		437.50
02475		Rutan & Tucker, LLP							
	I-1012353	Adjudication Litigation 10/24	R	11/27/2024	15,888.93		000119		15,888.93

* * T O T A L S * *	NO			INVOICE AMOUNT	DISCOUNTS	CHECK AMOUNT
REGULAR CHECKS:	3			40,878.67	0.00	40,878.67
HAND CHECKS:	0			0.00	0.00	0.00
DRAFTS:	0			0.00	0.00	0.00
EFT:	0			0.00	0.00	0.00
NON CHECKS:	0			0.00	0.00	0.00
VOID CHECKS:	0	VOID DEBITS	0.00			
		VOID CREDITS	0.00	0.00	0.00	

TOTAL ERRORS: 0

	NO	INVOICE AMOUNT	DISCOUNTS	CHECK AMOUNT
VENDOR SET: 01 BANK: ADJ TOTALS:	3	40,878.67	0.00	40,878.67
BANK: ADJ TOTALS:	3	40,878.67	0.00	40,878.67
REPORT TOTALS:	3	40,878.67	0.00	40,878.67

Casitas Municipal Water District
Reimbursement Disclosure Report (1)
Fiscal Year 2024/25
July 1, 2024-June 30, 2025

Date paid	Board of Director/Employee	Description	Amount Paid
7/10/2024	Scott Lewis	Hotel 05/18/25-05/25/24	$ 768.46
7/17/2024	Cory Johnson	Safety Boot Stipend	$ 205.00
7/25/2024	Juan Pablo Hernandez	Class A Exam	$ 145.06
7/25/2024	Ken Grinnell	Water Quality Laboratory Analyst Grade 1	$ 100.00
7/25/2024	Jesus Garcia	D3 Certification	$ 100.00
7/25/2024	Michael Kenney	Safety Boot Stipend	$ 205.00
7/25/2024	Jesus Garcia	Water Treatment Course	$ 299.99
8/14/2024	Gonzalo Corbajal-Ramirez	Safety Boot Stipend	$ 205.00
8/14/2024	Jesus Garcia	Safety Boot Stipend	$ 205.00
8/14/2024	Ramiro Garcia	Safety Boot Stipend	$ 205.00
8/14/2024	Eric Lara	Safety Boot Stipend	$ 205.00
8/14/2024	David Pope	Safety Boot Stipend	$ 205.00
8/14/2024	Edgar Ramos Jr.	Safety Boot Stipend	$ 205.00
8/14/2024	Michael Robles	Safety Boot Stipend	$ 205.00
8/14/2024	Jose Ruiz	Safety Boot Stipend	$ 205.00
8/14/2024	Corban Suggs	College Class	$ 172.00
8/22/2024	Anthony Albanez	Safety Boot Stipend	$ 205.00
8/22/2024	Gerardo Herrera	Safety Boot Stipend	$ 205.00
8/22/2024	Vincent Godinez	Safety Boot Stipend	$ 205.00
8/22/2024	Luis Mejia	Safety Boot Stipend	$ 205.00
8/22/2024	Brian Taylor	Safety Boot Stipend	$ 205.00
8/22/2024	Eduardo Lopez	Safety Boot Stipend	$ 205.00
8/22/2024	Spancer Hair	Safety Boot Stipend	$ 205.00
8/22/2024	David Rodela	Safety Boot Stipend	$ 205.00
8/22/2024	Juan Pablo Hernandez	Safety Boot Stipend	$ 205.00
9/4/2024	Jesus Garcia	Health and Society Class	$ 123.00
9/5/2024	Ronald Quinine	EMR Certificates	$ 258.00
9/5/2024	Spencer Hair	Pesticide Cert	$ 250.00
9/11/2024	Ramiro Garcia	DOT Physical	$ 114.13
9/11/2024	Luke Soholt	Damtender's Unsecured Property Tax	$ 414.99
9/11/2024	Brian Taylor	Pipeline Tools & Supplies	$ 203.16
9/18/2024	Michael Robles	DOT Physical	$ 110.00
9/19/2024	Donnell Evans	E&I-2 Certificate Renewal	$ 111.00
9/25/2024	Scott Lewis	Fisheries Supplies	$ 119.06
9/25/2024	Scott Lewis	Hotel for COFW Meeting	$ 107.97
10/3/2024	R.J. Faddis	Fuel - Unit 88	$ 127.48
10/3/2024	Cody Pletcher	Lifeguard Staff Party	$ 290.81
10/3/2024	Michael Shields	D5 Certification	$ 105.00
10/3/2024	Kevin Nguyen	Dell 480 GB Dive - hot sawp	$ 431.00
10/9/2024	Juan Pablo Hernandez	Safety Boot Stipend	$ 205.00
10/17/2024	Jesus Garcia	California Department of Pesticide Regulation Licensing Re	$ 140.00
10/17/2024	Alex Kelso	Grade 5 Water Treatment Operator Certification	$ 155.00
10/17/2024	Joe Martinez	Drinks for Staff Day	$ 118.39
10/17/2024	Justing Burgess	Safety Boot Stipend	$ 205.00
10/30/2024	Curtis Bowles	Safety Boot Stipend	$ 205.00
10/30/2024	Alex Kelso	Safety Boot Stipend	$ 205.00
10/30/2024	Scott MacDonald	Safety Boot Stipend	$ 205.00
10/30/2024	William Reeder	Safety Boot Stipend	$ 205.00
10/30/2024	Luke Soholt	Safety Boot Stipend	$ 205.00
11/13/2024	Gonzalo Corbajal-Ramirez	Mileage Reimbursement	$ 265.32
11/14/2024	Lindsay Cao	PE License Renewal	$ 180.00

CASITAS MUNICIPAL WATER DISTRICT
MEMORANDUM

TO: BOARD OF DIRECTORS

FROM: MICHAEL FLOOD – GENERAL MANAGER

SUBJECT: CAMP RAMAH BILLING RELIEF REQUEST - $19,000.00

ACCOUNT #: [redacted]

DATE: 11/05/2024

RECOMMENDATION:

Deny the customer's request for billing relief in the amount of $19,000.

BACKGROUND AND OVERVIEW:

Camp Ramah found a large leak in their irrigation system in an unused area of the property. The leak started sometime in August. Casitas reached out to Camp Ramah by email on 09/05/24 regarding the high use but did not receive a response. Casitas was able to make contact by phone on 09/11/24.

After an additional call from Casitas' field technician to Camp Ramah's Head of Maintenance on 9/26/24, the customer finally discovered the leak and had it repaired that same day.

The customer discovered that the water was flowing into a nearby creek, so it was difficult to determine if they indeed had a leak.

Camp Ramah is requesting bill relief for August and September of an estimated amount of $19,000.00 related to consumption.

A repair invoice and pictures were submitted with the application and are attached.

This account is classified as Agricultural-Domestic by Casitas.

DISCUSSION:

After some initial review and discussions with the customer, Casitas Staff informed the customer of the following:

1. The amount of the request should be related to the volumetric charge which staff calculated at $11,497.43, the customer's request was merely the customer's own estimate.

2. As an Agricultural-Domestic customer, only 50 Units of relief can be provided which amounts to $127.40. (This was approved by the GM and applied to the account)

3. The customer may appeal the Staff determination on the billing relief request but since it is in excess of $1,500.00, it would need to be determined by the Board of Directors.

ANALYSIS:

Since the Bill Relief request is greater than $1,500, the appeal of the staff determination proceeds in accordance with Section 20.2.3.2 of the Casitas Rates and Regulations (March 22, 2023 version):

20.2.3.2. <u>RELIEF OVER A CERTAIN AMOUNT</u>
If a request for bill relief is more than $1,500.00, the following process shall apply:

A. *The General Manager shall schedule an evidentiary appeal hearing before the Board of Directors' Appeals Panel.*
B. *The General Manager shall make a recommendation to the Appeals Panel. A copy of the General Manager's recommendation will be provided to the customer/appellant.*
C. *The customer/appellant shall have an opportunity to state their case and present evidence supporting their appeal.*
D. *Following the customer's presentation of the grounds for appeal, the Appeals Panel shall review the General Manager's recommendation and determine whether to grant the appeal in full, apportion the penalty or deny the appeal.*

This process will remain in effect until water conditions improve and Conservation Penalties are no longer being assessed by the District. At such time, the Board of Directors will assume the duties of the Appeals Panel related to the Leak Relief Adjustment Program.

Note that Conservation Penalties were suspended as of June 1, 2023.

The General Manager's recommendation follows this portion of Section 20.2.1.1 of the Casitas Rates and Regulations:

20.2.1.1. LEAK RELIEF ADJUSTMENT:

A leak relief adjustment is available to a customer who satisfies all the following conditions:

A. The customer is receiving Residential or Agricultural Domestic water service;

B. For Agricultural Domestic customers, a maximum of 50 HCF per month is eligible for relief (relating to Tier 1 and 2 water rates intended for domestic use);

Since this account is classified as Agricultural-Domestic, Casitas policy dictates that a maximum of 50 HCF (1 HCF = 1 Unit = 100 Cubic Feet) is allowed thus this request should be denied.

Also note that the customer has been placed on a payment plan for the outstanding amount and has been complying with the terms of the plan.

CASITAS MUNICIPAL WATER DISTRICT
1055 Ventura Avenue
Oak View, CA 93022
(805) 649-2251
customerservice@casitaswater.com

BILL RELIEF APPLICATION

IMPORTANT!
Before completing this application, please read the following:

Casitas Municipal Water District authorizes partial relief from extraordinary water charges and Conservation Penalties when an account holders bill relief application is:
1. Received within 45 days of date of bill.
2. Supported by written and photographic documentation.
3. Submitted with support detailing permanent repairs have been made. (i.e. invoices, receipts).

Requested Bill Relief:
- ■ Bill adjustment for leak relief relating to volumetric water rates (Residential/Ag Domestic Only)
- ■ Bill adjustment relating to Conservation Penalty

Name on Account: Camp Ramah in California Account Number: [redacted]

Service Address: 455 Fairview Rd, Ojai, CA 93023

Email Address: [redacted] Phone Number: [redacted]

1. Billing dates for which you are applying for relief (Dates of Water Bill)

From: August To: Septermber

2. Approximate Date of Incident: August 1, 2024 3. Approximate relief amount: $19,000.00

3. Attach a brief description of the nature of the incident that caused the high water consumption and what action was taken to rectify the situation, along with all supporting documentation.

4. Dates repairs were made: September 26, 2024

Print Name: Maria Brewer

Signature: Maria Brewer Date: October 3, 2024

By signing above, I understand and acknowledge that if approved for an adjustment, I will be ineligible for any future relief for a period of five (5) years from the date of approval.

The Bill Hearing Officer will review the request and all supporting documentation. A recommendation will be made and reported to the General Manager. The General Manager has the authority to make adjustments to extraordinary water charges as long as the customers is eligible for type of relief requested, claim for relief is due to circumstances beyond customers reasonable control, claim is supported with substantial evidence, and repairs have been made. Adjustments shall be made in accordance with guidelines approved by Board of Directors.

On September 24th my head of maintenance, Efren Calderon, received a call from Gonzales. He told Efren there must be a huge leak as the meter looked really high. This property, at 455 Fairview Rd, is beside the camp at 385 Fairview Rd, and there is a lot of empty land and some orange groves. The grove is where most of our attention goes. We have a ropes course located above this area as well.

Efren did his best to find a leak and found an area that he thought looked too green. I asked him to shut off the water and let things dry for a day. The following day the team began digging to see what we could find.

On Thursday September 26th they did discover the leak after a couple hours of searching. The main reason it was not discovered for so long is it was under a tree root buried underground, in an un-used area of the property. The tree is located by our creek bed, which means the excess water flowed into the creek. As there was still water flowing above this part of the creek, we never had reason to suspect something was wrong.

My understanding from your team is that our controller Margaret Allen was your main contact. However, Margaret took ill and is currently on a LOA, and never mentioned she put herself down to be called if there were any problems. I did receive a call in July about an unrelated issue at the 385 Fairview property. (At this time we discovered there was in fact no leak, but instead we had fixed a broken pump that fills up the reservoir which had gotten very low.)

My understanding is that your team tried to call Margaret but due to her health she is not working or using her work phone at this time. In addition we had a major security breach which resulted in a large loss due to fraud. This drove our IT team to increase our email security. As a result, all emails from Casitas Water are blocked as they are flagged as a possible security breach for our network. (After we discovered this, I instructed our IT department to bypass these additional security measures for your emails.)

It has been a frustrating time for myself and many of our vendors as we improve our cyber security.

All of these things combined seem to have created the ‘perfect storm’. The water loss breaks my heart as I love to support and promote good stewardship of our natural resources.

We were able to get Silver Plumbing on property the day we found the leak and it was immediately fixed. I have attached some photos to show the area, the leak, and the repair,

as well as the invoice from Silver.

As we are a non-profit and still struggling to recover after COVID. We really need any and all help we can receive as the bill is staggering. Water is a precious commondity and I do strive to respect and honor it and those who bring it to us.

Thank you for your help.

Silver Development & Associates Inc.
505 Golden West Avenue
Ojai, CA 93023 US
(805) 646-6920
silverdevelopment@roadrunner.com

Invoice 24320

SILVER
Development & Associates, Inc.

BILL TO
Elie Mechaly
Camp Ramah
385 Fairview Road
P.O. Box 158
Ojai, CA 93024

DATE	PLEASE PAY	DUE DATE
09/26/2024	**$4,365.06**	09/26/2024

ACTIVITY	QTY	RATE	AMOUNT
14 Plumbing:14 Plumbing Leak on 4" transit pipe cracked do too large Oak tree on top of pipe, dig both ways and removed 6' of pipe and installed new 4" Dr 14 class 900 and used 4" mechanical fittings to join back to transit pipe, no leaks	11	200.00	2,200.00
Materials Materials: 4" Dr 14-6', 2-4" bakers	1	1,395.35	1,395.35
22 Specialty Fuel charge	3	10.00	30.00
Equipment 550 truck for sand 1.5yd	1	65.00	65.00T
Materials Materials: 1.5 yds sand	1	60.00	60.00
22 Specialty Fuel charge	1	10.00	10.00
14 Plumbing:14 Plumbing Sanded pipe and back filled	3	200.00	600.00

Thank you for your business

SUBTOTAL	4,360.35
TAX	4.71
TOTAL	4,365.06
TOTAL DUE	$4,365.06

THANK YOU.

CASITAS MUNICIPAL WATER DISTRICT
MEMORANDUM

TO:	BOARD OF DIRECTORS
FROM:	MICHAEL FLOOD, GENERAL MANAGER
SUBJECT:	ROBLES DIVERSION AND FISH PASSAGE FACILITY ANNUAL REPAIR AND MAINTENANCE PROGRAM
DATE:	12/11/24

RECOMMENDATION:

It is recommended the Board of Directors:

- Schedule a public hearing on January 22, 2025 to consider adoption of the Initial Study and Mitigated Negative Declaration (IS-MND) for the annual Routine Repair and Maintenance Program for the existing Robles Diversion and Fish Passage Facility.

BACKGROUND:

The Robles Diversion and Fish Passage Facility (Robles Facility) requires ongoing annual maintenance and repair activities, including sediment management that can negatively affect water supply and fish passage. Casitas is seeking permits with a duration of 10 years or more to include routine repair and maintenance activities.

The permits for annual repair and maintenance fall under the jurisdiction of several agencies, including California Department of Fish and Wildlife (CDFW), United States Army Corps of Engineers (USACE), Los Angeles Regional Water Quality Control Board (RWQCB).

Casitas engaged Rincon Consultants in 2020 to prepare and coordinate environmental compliance approvals and permits, including compliance with the California Environmental Quality Act (CEQA).

DISCUSSION:

The primary objective of Casitas' routine maintenance and repair program is to ensure the continued and proper operation of the Robles Diversion and Fish Passage Facility. By maintaining the Robles Facility consistent with its original design, Casitas reduces or prevents ineffective operation of the water diversion and fish ladder.

Typical maintenance activities include sediment/debris removal; vegetation control; repair and maintenance of the radial gates (at the entrance to the headworks and spillway) and other facility control gates; instrumentation; and road maintenance. Repair activities also include concrete work within the existing footprint of the Robles Facility and replacement of wood timbers (timber cut-off wall and debris fence).

A copy of the full project description is provided in Attachment 1.

The Robles Facility maintenance and repair activities occur in and around the Ventura River and are regulated by several state and federal agencies. Previous permits were obtained by Casitas on an as-needed basis for individual repair and maintenance activities, which has been time-consuming and inefficient. Under the proposed program, Casitas is seeking to streamline the process by obtaining permits for a duration of 10 years or more for all routine repair and maintenance activities.

TABLE 1. SUMMARY OF PERMITS AND STATUS FOR ROBLES FACILITY ROUTINE MAINTENANCE AND REPAIR ACTIVITIES

Agency	Regulatory Permits/Authorizations	Status
CDFW	**Routine Maintenance Agreement (RMA**). Modification to the bed, bank, and/or vegetation in a natural drainage is regulated by the CDFW under Section 1600 et seq. of the Fish and Game Code.	• RMA application submitted to CDFW on May 25, 2023; • CDFW deemed the application complete on October 28, 2024; • Execution of RMA agreement requires completion of CEQA.
USACE	**Section 404 of Clean Water Act.** Activities that result in the discharge of dredged or fill material in watercourses are regulated by USACE. In addition, the federal Endangered Species Act (ESA) Section 7 requires consultations between the US Bureau of Reclamation (USBR), US Fish and Wildlife Service (USFWS), and National Marine Fisheries Service (NMFS). USBR will conduct necessary compliance related to the National Environmental Policy Act (NEPA).	• Section 404 application submitted to USACE February 14, 2024; • Pending completion of environmental documents by United States Bureau of Reclamation and subsequent review by regulatory agencies
RWQCB	**401 Water Quality Certification.** Issuance of a USACE permit under Section 404 of the Clean Water Act also requires a 401 Water Quality Certification by the Los Angeles RWQCB.	Section 401 certification obtained November 21, 2023. Effective until October 3, 2029. (File No. 19-038)

On April 18, 2024, the California Fish and Game Commission listed Southern California Steelhead as an endangered species under the California Endangered Species Act (CESA). Casitas has been in discussions with CDFW regarding the changing regulatory requirements. Based on these discussions, Casitas is proceeding with the RMA for activities as currently described in the Annual Repair and Maintenance Program. Work is currently underway for a separate Incidental Take Permit for CESA compliance.

CEQA Compliance

Given the request for a longer-term RMA from CDFW, and circumstances related to the recent CESA listing, it has been determined that a Categorical Exemption will not qualify for CDFW approval of CEQA compliance the for the Annual Repair and Maintenance Program. Therefore, an Initial Study and Mitigated Negative Declaration (IS-MND) had been prepared (Attachment 1). The IS-MND including appendices is available at the link below:

https://www.casitaswater.org/files/15fba9180/CMWD_Robles+RM-Program_IS-MND_2024-12-11_Final+with+Appendices.pdf
The Notice of Intent to Adopt a Mitigated Negative Declaration was published in the Ojai Valley News on October 15, 2021 and VC Star on October 20, 2021. The draft Initial Study-Mitigated Negative Declaration (IS-MND) and appendices were also posted to the District's website for a minimum 30-day public review period from October 22, 2021 through November 24, 2021. During the public review period, comment letters were received from CDFW and Ventura County. The comment letters and responses are provided as Appendix J to the IS-MND.

Following the public review period, the project description has been revised with minor changes and the IS-MND has been updated where information was outdated. Pursuant to CEQA guidelines, recirculation is not required when new information is added to the negative declaration which merely clarifies, amplifies, or makes insignificant modifications to the negative declaration. Accordingly, recirculation is not required as a result of the changes.

FINANCIAL IMPACT:

The budget for the Robles Facility Annual Maintenance and Repair Program will be assessed annually as part of the budget adoption process. The permits will require annual reporting to the regulatory agencies, although this work effort is anticipated to be more streamlined than obtaining new permits every year.

ATTACHMENTS:

1. Final Initial Study – Mitigated Negative Declaration
2. Appendix J – Responses to Comments on the Draft IS-MND

Note: Due to file size, all the appendices to the IS-MND are not included as attachments. The full IS-MND including appendices is available on the District website at the link below:

https://www.casitaswater.org/files/15fba9180/CMWD_Robles+RM-Program_IS-MND_2024-12-11_Final+with+Appendices.pdf

Robles Diversion and Fish Passage Facility Annual Maintenance and Repair Program

Final Initial Study – Mitigated Negative Declaration

prepared by

Casitas Municipal Water District
1055 North Ventura Avenue
Oak View, California 93022
Contact: Kelley A. Dyer, P.E.
Assistant General Manager

prepared with the assistance of

Rincon Consultants, Inc.
180 North Ashwood Avenue
Ventura, California 93003

December 2024

RINCON CONSULTANTS, INC.
Environmental Scientists | Planners | Engineers
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Acronyms and Abbreviations

AB	Assembly Bill
AE	Agriculture Exclusive zone
Basin	South Central Coast Air Basin
Basin Plan	Central Coastal Basin Water Quality Control Plan
BMP	Best Management Practice
BPS	Booster Pump Station
BSA	Biological Study Area
CAAQS	California Ambient Air Quality Standards
CalEEMod	California Emissions Estimator Model
Caltrans	California Department of Transportation
CA	Coastal Agriculture zone
CALFIRE	California Department of Forestry and Fire Protection
CAP	Climate Action Plan
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
Casitas	Casitas Municipal Water District
CBC	California Building Code
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CMA	Congestion Management Agency
CMP	Congestion Management Plan
CRHR	California Register of Historical Resources
CH_4	methane
CNEL	community noise equivalent level
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
CVWD	Carpinteria Valley Water District
CWA	Clean Water Act
dB	decibel

dB(A)	A-weighted decibel
DTSC	California Department of Toxic Substances Control
DWR	California Department of Water Resources
ECAP	County of Santa Barbara's Energy and Climate Action Plan
EIA	United States Energy Information Administration
EO	Executive Order
ESHA	environmentally sensitive habitat area
ERMs	emission reduction measures
FEMA	Federal Emergency Management Agency
FTA	Federal Transit Administration
GHG	greenhouse gas
HDD	horizontal directional drilling
HMMP	Habitat Mitigation and Monitoring Plan
HMMSCP	Hazardous Materials Management and Spill Control Plan
HP	horsepower
IS-MND	Initial Study-Mitigated Negative Declaration
kWh	kilowatt-hours
lbs/day	pounds per day
L_{eq}	one-hour equivalent noise level
LF	linear feet
MLD	most likely descendant
MS4	Municipal Separate Storm Sewer Systems
MT	metric tons
NAAQS	National Ambient Air Quality Standards
NHPA	National Historic Preservation Act
N_2O	nitrous oxide
NO_X	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Properties
OS	Open Space zone
$PM_{2.5}$	particulate matter 2.5 microns or less in diameter
PM_{10}	particulate matter 10 microns or less in diameter
ppv	peak particle velocity

PRC	Public Resources Code
Reclamation	U.S. Department of the Interior, Bureau of Reclamation
ROC	reactive organic compound
rms	root mean square
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SC	Southern California
SBCAPCD	Santa Barbara County Air Pollution Control District
SCADA	supervisory control and data acquisition
SCAQMD	South Coast Air Quality Management District
SCCIC	South Central Coastal Information Center
SCE	Southern California Edison
SO_X	sulfur oxides
SR	State Route
SRA	State Responsibility Area
SWP	State Water Project
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TMP	Traffic Management Plan
tpy	tons per year
USACE	U.S. Army Corps of Engineers
VCAPCD	Ventura County Air Pollution Control District
VCTC	Ventura County Transportation Commission
VMT	vehicle miles traveled
VOC	volatile organic compound
WEAP	Worker Environmental Awareness Program

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Introduction

In accordance with the requirements of CEQA Guidelines Section 15073, Casitas Municipal Water District (Casitas) published the Initial Study-Mitigated Negative Declaration (IS-MND) for the Robles Diversion and Fish Passage Facility Annual Maintenance and Repair Program in October 2021 for public review. The public review period lasted from October 22, 2021 through November 24, 2021. Since then, there have been minor changes to the project description. The purpose of this document is to update the IS-MND in accordance with these minor changes and update outdated information within the IS-MND.

Pursuant to CEQA Guidelines Section 15073.5, a lead agency is required to recirculate a negative declaration when the document must be substantially revised after public notice of its availability has previously been given, but prior to its adoption. CEQA Guidelines 15073.5(b) states a "substantial revision" shall mean:

1. A new, avoidable significant effect is identified and mitigation measures or project revisions must be added in order to reduce the effect to insignificance, or
2. The lead agency determines that the proposed mitigation measures or project revisions will not reduce potential effects to less than significance and new measures or revisions must be required.

CEQA Guidelines 15073.5(c)(4) states recirculation is not required when new information is added to the negative declaration which merely clarifies, amplifies, or makes insignificant modifications to the negative declaration. Although changes to the project description have resulted in changes to the text of the IS-MND, these changes merely clarify and/or amplify existing information within the IS-MND and therefore do not constitute substantial revisions. Accordingly, recirculation of this IS-MND is not required as a result of the changes made to this IS-MND.

Any changes made to the text of the IS-MND, other than minor typographical corrections, are shown in the IS-MND in underline for text additions and ~~strikethrough~~ for text deletions.

Initial Study

1. Project Title

Robles Diversion and Fish Passage Facility Annual Maintenance and Repair Program (R&M Program)

2. Lead Agency Name and Address

Casitas Municipal Water District
1055 North Ventura Avenue
Oak View, California 93022

3. Contact Person and Phone Number

Kelley A. Dyer, PE
Assistant General Manager
Casitas Municipal Water District
Phone: 805-649-2251 ext. 150
email: kdyer@casitaswater.com

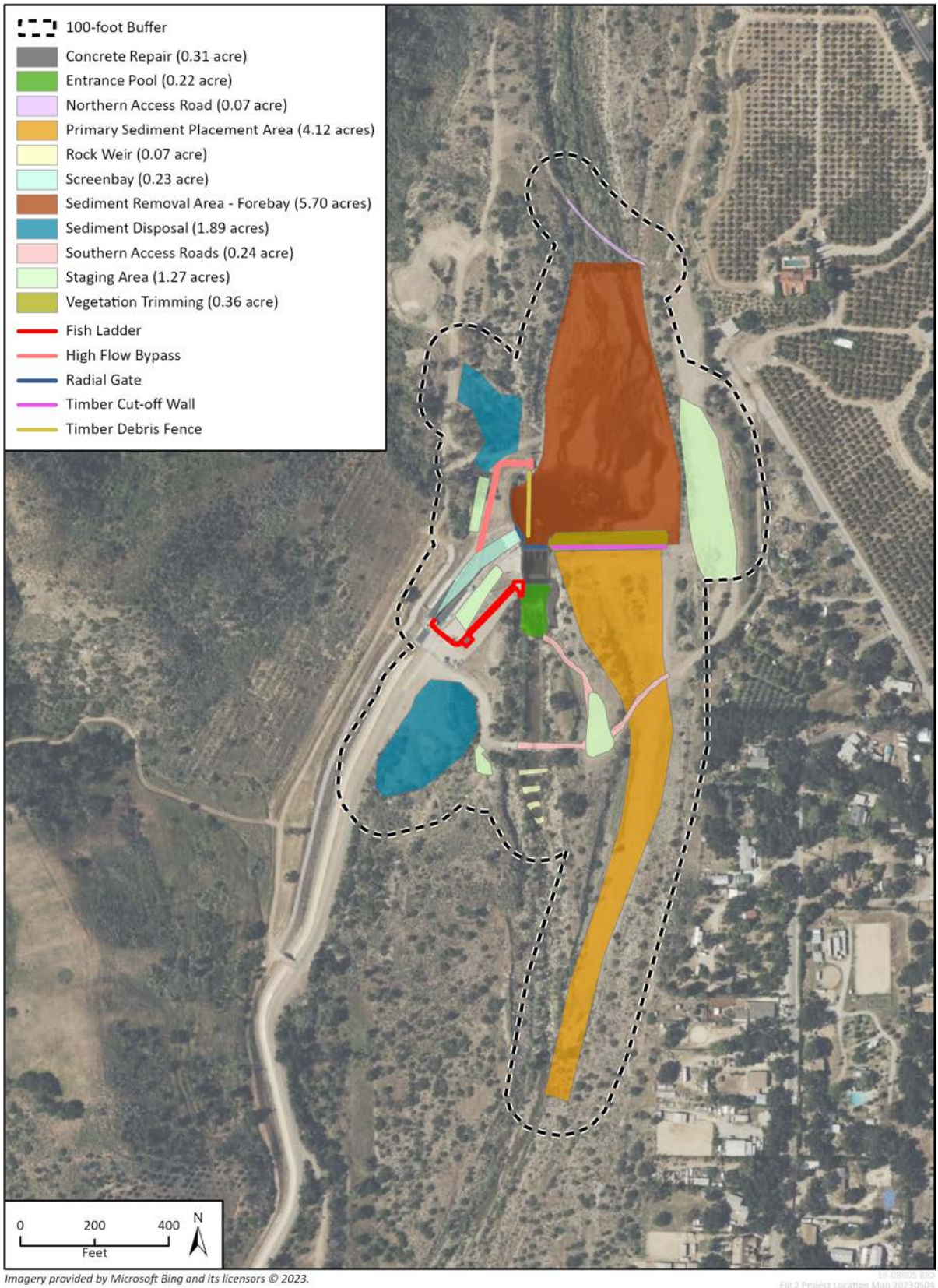
4. Project Location

Casitas operates the Robles Diversion and Fish Passage Facility (Facility), as part of the United States Department of the Interior, Bureau of Reclamation's (Reclamation) Ventura River Project. The Facility was designed in 1957 by Reclamation (United States Department of Interior, Bureau of Reclamation, Robles Diversion Dam General Plan, February 8, 1957) and constructed in 1958. The forebay footprint in 1957 (Appendix D) was larger than it is now. Following severe storms in 1978, the forebay was inundated with sediment, substantially decreasing the area and depth of the earthen basin. Presently, the forebay includes approximately 5.70 acres of the Ventura River. The Facility comprises approximately 10 acres of the Ventura River. Fish passage facilities were constructed in 2004 to provide for passage of endangered Southern California (SC) steelhead around the diversion dam, while avoiding entrainment in the Robles Diversion Canal.

The Facility is located on the Ventura River, 2 miles downstream of Matilija Dam and 14.5 miles upstream of the Pacific Ocean, in unincorporated Ventura County, California (34.464820°N, -119.291107°W) within the Matilija United States Geological Survey 7.5-minute topographic quadrangle (Figure 1). The project area (Figure 2) encompasses all of Casitas' facilities associated with the Robles Diversion, including the forebay; radial gates and instrumentation and measuring devices, proposed sediment placement area downstream of the timber cut-off wall; fish passage facility (high-flow fish bypass, timber debris fence, screenbay, screens, brush arms, fish ladder, "entrance box," and all appurtenances); rock weirs, measurement weir, and entrance pool downstream of the spillway gates; stockpile and staging areas; and access roads (hereafter referred to as Project Area) (Figure 2). The Robles Diversion allows a portion of Ventura River flows to be diverted into the Robles Diversion Canal, which transports the water to Lake Casitas for storage and subsequent delivery for municipal and agricultural use.

Figure 1 Regional Project Location

Figure 2 Project Area



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No repair and maintenance activities are proposed within the Robles Diversion Canal as part of this program. Instrumentation within the canal downstream of the diversion, such as the staff gauge on the bridge near Cooper Canyon Road, do not typically require repairs that would affect the Ventura River or related biological resources.

5. Project Sponsor's Names and Addresses

Casitas Municipal Water District
1055 North Ventura Avenue
Oak View, California 93022

6. General Plan Designation

Open Space (OS)

7. Zoning

Open Space (OS-80 ac/TRU/DKS/HCWC and OS-80 ac/TRU/DKS)

8. Program Background

Casitas Municipal Water District (Casitas) is a special district formed in 1952 to develop water supply for agricultural, municipal, industrial, and residential use in western Ventura County. Casitas entered into an agreement with Reclamation that led to the construction of the Casitas Dam and associated facilities (the Ventura River Project) which were completed in 1958. The facilities were built by Reclamation under a repayment contract with Casitas. The Facility, on the Ventura River, allows Casitas to divert a portion of river flows into the concrete-lined Robles Diversion Canal, which flows approximately 5.5 miles to Lake Casitas.

In August 1997, SC Distinct Population Segment of steelhead (*Oncorhynchus mykiss*; SC steelhead) were listed as an endangered species under the federal Endangered Species Act (ESA; 16 U.S.C. § 1531 et seq.). SC steelhead are the listed species in the Ventura River. In 2004, Casitas constructed a fish ladder (fishway), fish screen, high- and low-flow fish exit channels, a spillway energy dissipater, and a series of low-head rock weirs at the Facility. The project modified the existing Facility to provide for the safe upstream and downstream passage of adult steelhead and the safe downstream passage of juveniles. Reclamation owns the Facility, and Casitas operates and maintains this Facility.

Typical maintenance activities at the Facility include sediment/debris removal; vegetation control; repair and maintenance of the radial gates (at the entrance to the headworks and spillway) and other facility control gates; instrumentation; and road maintenance. Repair activities also include concrete work within the existing footprint of the Facility and replacement of wood timbers (timber cut-off wall and debris fence).

The Facility maintenance and repairs occur in and around the Ventura River where such activities are regulated by several state and federal agencies. Modifications to the bed, bank, and/or vegetation in a natural drainage are regulated by the California Department of Fish and Wildlife (CDFW) under Section 1600 *et seq.* of the California Fish and Game Code. Such modifications require

a Streambed Alteration Agreement. Activities that result in discharge of dredged or fill material into watercourses (such as bank stabilization and excavation) are also regulated by the United States Army Corps of Engineers (USACE) under Section 404 of the Clean Water Act. Issuance of a Section 404 permit authorizing discharge also requires a Section 401 Water Quality Certification by the Los Angeles Regional Water Quality Control Board (RWQCB). Maintenance and repair activities conform to those described in the existing Biological Opinion (BiOp) issued to Reclamation by the National Marine Fisheries Service (NMFS) in 2003 for effects to SC steelhead from the construction and operation of the Facility. In addition, the United States Fish and Wildlife Service (USFWS) issued a BiOp to Casitas in October 2019 for the Robles Diversion Forebay Restoration Project and its effects on California red-legged frog (*Rana draytonii*). ~~Maintenance and repair activities conform to those described in the USFWS issued BiOp~~.

In 2003, Casitas acquired agreements and permits from CDFW, USACE, RWQCB, and USFWS for construction of the Facility (Appendix B). Additionally, a Mitigated Negative Declaration (MND) was prepared for the fish passage improvements at the Facility (Appendix C). However, the construction permits and BiOp issued in 2003 did not address the comprehensive maintenance activities required for the Facility, and therefore Casitas acquired the above agreements and permits on an as-needed basis for individual maintenance activities at the Facility. This approach is time-consuming, inefficient, and often results in delays, which has prompted Casitas to seek consolidated coverage for the ongoing maintenance and repair program. Casitas is seeking regulatory permits and coverage under the ESA for effects to ESA listed species and critical habitat from a comprehensive program of maintenance activities. The period for the program would be 10 years or more, to include all regulated activities, include a streamlined administrative approval process, and to provide predictability and certainty on environmental protection measures. Long-term permits, as compared to case-by-case permitting, reduces the administrative efforts by Casitas and the permitting agencies, and provide a more comprehensive and effective basis for protecting environmental resources.

Casitas has implemented environmental protection measures as requested by the state and federal resource agencies pursuant to past permits and authorizations issued for as-needed maintenance and repair projects. Casitas proposes continuing to implement environmental protection measures into its ongoing annual maintenance and repair program, which have reduced effects of the past projects on the environment. The environmental protection measures, called environmental Best Management Practices (BMPs), are described in Section 10.

BMPs are included in the proposed action and their effects are analyzed for the ESA Section 7 consultation. Their effects also must be evaluated in the environmental review requirements of the California Environmental Quality Act (CEQA). The proposed action, including the BMPs to avoid or minimize effects of the activities on the environment, are described herein.

Casitas held preliminary meetings with the state (RWQCB and CDFW) and federal (NMFS, Reclamation, USACE and USFWS) agency representatives to discuss the proposed maintenance and repair activities to be included in the programmatic permits. Meetings took place on January 15, 2020, and February 11, 2020, with the CDFW; January 21, 2020, with the Los Angeles RWQCB; and February 5, 2020, with the USACE, USFWS, and NMFS. All agency representatives provided feedback on the proposed activity descriptions, which Casitas has incorporated into the Final Project Description.

9. Description of Maintenance and Repair Program

This section describes Casitas' Maintenance and Repair Program, referred to hereinafter as the proposed project. The primary objective of the Casitas routine maintenance and repair program is to ensure the continued and proper operation of the Facility. By maintaining this Facility consistent with its original design, Casitas reduces or prevents ineffective operation of the water diversion and fish ladder. The Robles Diversion allows a portion of Ventura River flow to be diverted into the Robles Diversion Canal, which transports the water to Lake Casitas for storage and delivery for municipal and agricultural use. Casitas provides drinking water for approximately 70,000 western Ventura County residents (City of Ventura, City of Ojai and unincorporated Ventura County areas). Additionally, Casitas provides irrigation water for roughly 5,000 acres of mostly permanent agricultural crops. Lake Casitas is the only reservoir from which Casitas supplies its customers, and adequate lake levels are dependent on receiving sufficient inflows from the Robles Diversion Canal. The proposed maintenance and repair activities preserve the conveyance capacity of the Facility by preventing the accumulation of obstructing vegetation and sediments that could impede Facility fish passage and water diversion operations.

9.1 Routine Versus Emergency Maintenance

Most of the maintenance and repair activities are routine. Maintenance work is scheduled in advance based upon the results of regular inspections and consists of activities to keep the Facility operating in accordance with its design specifications. Work is scheduled taking into account time of year, hydrologic and environmental conditions, staff and equipment resources, and budget. The extent and frequency of maintenance varies greatly from year to year, depending upon the frequency and intensity of storm events, conditions of Facility, and environmental constraints.

Emergency actions which require immediate repair to protect life and property are addressed separately on a case-by-case basis with state and federal regulatory agencies, and are not part of the proposed action.

9.2 Activities Descriptions

For the purposes of Casitas' Annual Maintenance and Repair Program, the proposed Maintenance and Repair Activities are grouped as follows:

- No. 1 (Forebay Sediment)
    a. Forebay Sediment Removal
    b. Forebay Sediment Placement
        i. Stockpile area
- No. 2 (Fish Ladder, Screenbay, High-flow Bypass)
- No. 3 (Rock Weir and Measurement Weir)
- No. 4 (Entrance Pool and entrance box)
- No. 5 (Concrete Repair)
- No. 6 (Routine Repair and Maintenance)
    a. Timber Cut-off Wall
    b. Debris Fence

c. Radial Gates
d. Instrumentation and measuring devices
e. Roads and access surfaces

Detailed Project Descriptions for each activity are provided in the following subsections.

Activity No. 1 Forebay Sediment

Permit History

Maintaining the depth and volume of the forebay is critical to operation of the Facility and to fish passage. When the forebay was designed in 1957, the footprint of the earthen basin was larger than it is now (Appendix D). Following the severe storms in 1978, the forebay decreased in size to 5.70 acres, and Casitas has continued to maintain this footprint (Appendix E). The forebay requires regular maintenance, especially after heavy rainfall years, or during post-fire watershed recovery periods. Casitas currently acquires several state and federal agency agreements and/or permits on an as-needed basis for restoration of the forebay.

In accordance with the NMFS BiOp issued to Reclamation for operation of the Facility (NMFS 2003), Casitas must maintain the storage capacity of the forebay for effective diversion and fish ladder operations. As described in the BiOp, sediment and debris accumulate in the forebay and require periodic removal, and large storm events can create the need to shore up the earthen dam (timber cutoff wall) and forebay banks. The 2003 NMFS BiOp allows Casitas to create a shallow channel within the forebay to direct low-flows to the diversion structure. This shallow channel is re-constructed after high runoff events and may not be required every year. The creation of the shallow channel and removal of excess sediment is accomplished by heavy equipment when the channel is dry.

In 2019, Casitas completed permitting and consultations through the resource agencies for the action to remove and relocate 100,000 cubic yards of sediment downstream over a three-year period. NMFS issued a letter of concurrence (LOC) to remove up to 50,000 cubic yards in 2019, as proposed. Approximately 32,600 cubic yards of sediment trapped in the forebay was relocated by Casitas to the designated placement area downstream of the cut-off wall, in November 2019. ~~Provisions for removing additional sediment have been arranged through 2021~~. <u>During October and November 2021, an additional 15,300 cubic yards of sediment was removed from the forebay. Most of this sediment was stockpiled in designated on-site sediment disposal areas on the west side of the forebay since there was not sufficient capacity within the primary placement area.</u>

Sediment Removal (1A)

The annual maintenance and repair program sediment removal would occur during the dry season, when surface water is absent in the forebay. It is anticipated the project would require up to 60 working days to complete. Access to the forebay and downstream sediment placement area would be from the north end of Rice Road located east of the forebay. The northern and southern access roads would be utilized.

The heavy equipment needed for this activity would be staged in disturbed areas created previously during Facility construction. This includes amenable areas located immediately west of the forebay adjacent to the high-flow bypass and also due east of the forebay, with each having a supportive gravel base and providing ready access, requiring minimal travel (Figure 2).

Maintenance of the forebay requires moving sediment, rock, and emergent vegetation within the channel using heavy equipment. The solids would be removed from the forebay with equipment that could include for example, a backhoe, Caterpillar 950 loader, Caterpillar dozer (D8 & D6), Caterpillar excavator 320, Caterpillar 120 grader, Caterpillar excavator 350, Caterpillar articulated dump truck 725, work trucks (Ford F350 type), and a water truck or similar types of equipment (e.g., generically – excavators, graders, bulldozers, dump truck) or other similar equipment suitable to the purpose. This equipment is used to transport and spread the sediment and shore up the channel banks of the timber cut-off wall eroded by heavy storms (1A; Figure 3).

This maintenance and repair activity may occur annually to return the forebay closer to its historical operational grade (Appendix E) by removing accumulated sediment, and relocating it downstream (1B; Figure 3), or to a stockpile area above the mean high-water mark. The remaining sediment excavated may be exported off-site. The quantity of sediment/debris to be removed depends greatly on storm load deposition, which is highly dynamic. In some years no removal would be needed, in other years moderate amounts would be required to be removed, and at such times it is generally anticipated that it will not exceed approximately 56,500 cubic yards per year. When annual accumulation is unusually great, as has occasionally occurred in the past, there may be a need to remove additional sediment. This would extend the work duration by approximately one week for every 10,000 cubic yards of additional sediment to be removed. All work would be conducted within permitted work windows and under dry conditions.

Based on the extent of damage and conditions, it may be necessary to perform emergency repairs to the Facility that involve recontouring or removal of sediment from the forebay during wet conditions. In accordance with the NMFS BiOp, if work must occur during wet conditions to restore the timber cutoff wall, BMPs will be applied to control water entering the Facility and limit turbidity leaving the Facility.

Sediment Placement (1B)

When flows are sufficiently high to overtop the cut-off wall, erosion of the streambed and banks of the overflow channel downstream occurs. Sediment removed during forebay maintenance activities is first used to restore these storm-eroded areas. For the purpose of routine maintenance, Casitas proposes to restore the forebay area by removing the accumulated sediment annually, typically when 10 percent of basin capacity is occupied by sediment and debris, subject to flow and sediment conditions. The sediment removed would be used to restore storm-eroded areas within 1,100 linear feet downstream of the timber cut-off wall, in the designated primary placement area. The sediment would be deposited downstream of the timber cut-off wall over approximately 4.12 acres, where forebay sediment has been placed in the past, and where active flow within the channel would not be impeded (Figure 1B; Figure 3). The primary placement area allows sediment to remain in the Ventura River and be transported downstream as would naturally occur.

Prior to placing sediments during the November 2019 maintenance cycle, Casitas developed a fill design for the downstream placement area. This design was based upon the anticipated contours and elevation of the streambed associated with the placement of 50,000 cubic yards of sediment in the area. In December 2019, following the placement of approximately 32,600 cubic yards[1] of

1 Preliminary calculations revealed the volume of sediment to be removed from the forebay in 2019, 2020, 2021 totaled 100,000 cubic yards. Based on more extensive post-placement surveys and review of Casitas' historic sediment removal practices, Casitas determined the forebay can hold up to approximately 56,500 cubic yards of sediment (maximum volume of water to a flat surface at the top of the timber cut-off wall). Post-placement comparison of the LiDAR data revealed that approximately 32,600 cubic yards of sediment was

sediment downstream of the timber cut-off wall, a photogrammetric aerial survey was conducted to document post-placement conditions. ~~of the placement area. The aerial survey from December will be compared to the fill design plan from November to determine how much sediment can be placed downstream in subsequent actions.~~

Because overtopping of the cut-off wall does not occur unless flow in the Ventura River generally exceeds 7,000 to 8,000 cubic feet per second (cfs), it may not be possible to relocate sediment from the forebay to the placement area every year. Therefore, before initiating sediment removal actions, Casitas would evaluate conditions of the sediment placement area at the end of the storm season (April/May) to determine how much sediment can be placed there as opposed to amounts that may need to be moved to disposal areas.

If the amount of sediment to be excavated exceeds the capacity of the placement area, the excess sediment that cannot be placed downstream would be stockpiled above the ordinary high-water mark of the Ventura River in designated soil disposal areas (Figure 2) or exported off-site. If sediment is stockpiled in designated disposal areas on-site, Casitas would evaluate whether stockpiled sediment can be placed back into the river each year, pending capacity established in the survey of the deposition area.

Prior to placement of sediment, any noxious vegetation identified by a qualified biological monitor within pre-selected soil disposal areas shall be removed ~~(Figure 3)~~. Noxious vegetation shall be disposed of in a manner and at a location to prevent its re-establishment. Casitas staff or contractors would perform chipping of giant reed (*Arundo donax*) and disperse chipped material in designated locations where materials would not wash downstream or propagate. All cut/removed noxious vegetation would be taken to a dump as a destruction load. Noxious species would be removed by hand or by hand-operated power tools, rather than by chemical means, where practicable. Casitas would monitor the soil disposal areas following sediment placement in these areas, and remove noxious species by hand, if necessary, before seeds ripen.

Table 1 shows the extent of temporary impacts to potentially jurisdictional areas resulting from this activity.

Table 1 Anticipated Temporary Impacts to Ventura River from Activity 1A/B

Feature	Waters of the U.S.[1]		Waters of the State[2] (acres/linear feet)	CDFW Jurisdictional Area[2] (acres/linear feet)
	Non-wetland Waters of the U.S. (acres/linear feet)	Wetland Waters of the U.S. (acres/linear feet)		
Forebay	5.34[3]/800	–/–	5.34[3]/800	5.34[3]/800
Primary Placement Area	4.12/1,100	–/–	4.12/1,100	4.12/1,100

CDFW = California Department of Fish and Wildlife

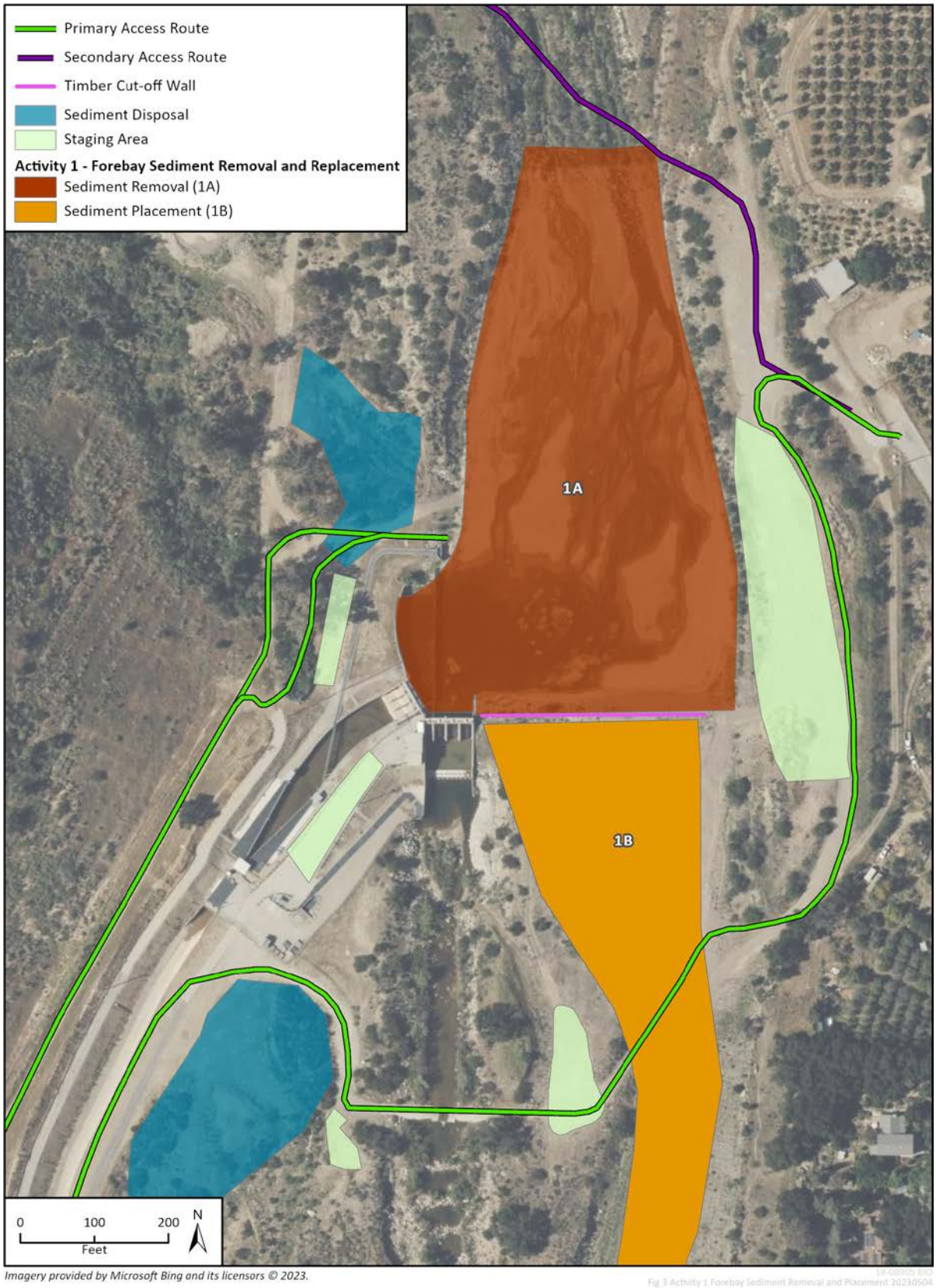
[1] Calculated to Ordinary High-Water Mark or edge of wetland

[2] Calculated to top of bank or edge of riparian

[3] Calculation excludes the portion of the forebay which overlaps with the vegetation trimming area along the cut-off wall (Activity 6A; 0.36 acre).

removed from the forebay in November 2019 ~~and deposited in the primary placement area and approximately 15,500 cubic yards of sediment remains in the forebay~~. Between October and November 2021, an additional 15,300 cubic yards of sediment was removed from the forebay and the majority of this sediment was stockpiled in designated on-site sediment disposal areas on the west side of the forebay since there was not sufficient capacity within the primary placement area. Going forward, Casitas will maintain the forebay footprint (5.70 acres) by typically removing up to approximately 56,500 cubic yards of sediment each year. Typically, the sediment removal project will occur when 10 to 20 percent of basin capacity is occupied by sediment and debris.

Figure 3 Activity 1 Forebay Sediment



Activity No. 2 Fish Ladder, Screenbay, High-flow Bypass

Permit History

The construction of the fish ladder (2A), screenbay (2B), and high-flow bypass (2C) occurred as part of the permitted Robles Diversion and Fish Passage Project in 2003/2004 providing for fish passage through the Facility (Figure 4). Casitas provided compensatory mitigation in the form of on-site restoration to compensate for permanent impacts to jurisdictional areas (Appendix B). No additional temporary or permanent impacts to jurisdictional areas requiring compensatory mitigation for USACE, RWQCB, or CDFW requirements would result from maintenance of the fish ladder, screenbay, and high-flow bypass structures.

In accordance with the NMFS BiOp, during the fish flow operations season, January through June, the Facility is monitored for large debris by on-site staff. During operation, sediment and debris can accumulate in the fish ladder, screenbay, and high-flow bypass and impede fish passage and proper operation of the fish screens. When this occurs, small debris is removed by hand, including hand tools, via the access grating above the fish ladder, screenbay, and high-flow bypass. Depending on flow conditions, sediment may be removed mechanically from the fish ladder, screenbay, and high-flow bypass. If Casitas must use mechanical equipment to remove sediment/debris or make repairs in these areas, the Facility is shut down temporarily and water diversions cease until sediment/debris is removed and/or repairs are made. The necessary repairs or maintenance are conducted as quickly and safely as possible and the Facility is put back in service once it is fixed.

Facility Maintenance

It is anticipated the Facility can operate throughout a single fish passage season without the need for any extensive repairs or maintenance. Whenever possible, extensive maintenance or repairs are performed during dry periods or when the fishway is not in operation. The potential exists, however, for substantial damage to result from debris accumulation during the fish passage season. For example, debris or sediment accumulation in the fish ladder, screenbay, and high-flow bypass could impede the function of the baffles, flow meter, entrance gates, and sill blocks. Should this happen during the fish flow operations season (January 1 through June 30), Casitas would evaluate whether maintenance and repair activities are critical to maintain diversion and fish passage operations.

If Casitas determines maintenance and repair of Facility components (e.g., removal of accumulated debris in the fishway) is critical during the fish passage season, the portion of the facilities requiring repair or maintenance would be temporarily shut down. The necessary repairs or maintenance on the Facility would be conducted as soon as possible and the structure(s) would be put back in service once repairs are made. Maintenance of the fish ladder, screenbay, and high-flow bypass would not result in permanent impacts or alterations to the design of these facilities.

Maintenance and repair which is determined non-critical to address during the fish passage season would be addressed during the dry season prior to the next passage season. ~~In some years between June and October (typical dry period), limited baseflow in the Ventura River may persist, and no dry period will materialize. If this condition occurs, maintenance and repair activities will be addressed outside of fish passage season when there is little or no flow~~. It is essential to address maintenance and repair issues outside of the fish passage season (e.g., debris and sediment accumulation) because they have potential to compound into larger issues during the subsequent passage season, if not addressed.

Access to the fish ladder, screenbay, and high-flow bypass occurs via: the north end of Rice Road east of the forebay; the northern access road at the upper limit of the forebay; and the canal road to the south. Staging of heavy equipment occurs west of the forebay adjacent to the high-flow bypass, which is unpaved (Figure 2). It is anticipated the maintenance and repair activities would require 1 to 2 weeks to complete annually, including heavy equipment use for up to 1 week.

REMOVAL OF SMALL DEBRIS

Small debris would be removed by hand via the access grate above the fish ladder, screenbay, and high-flow bypass. Small debris removal would occur throughout the year provided that it can be safely accomplished without shutting down the facilities. It is possible that removal of small debris may require a partial shutdown of facilities during wet conditions; in this case, the work would only be conducted if necessary to prevent critical issues and maintain operations of the diversion and fish passage.

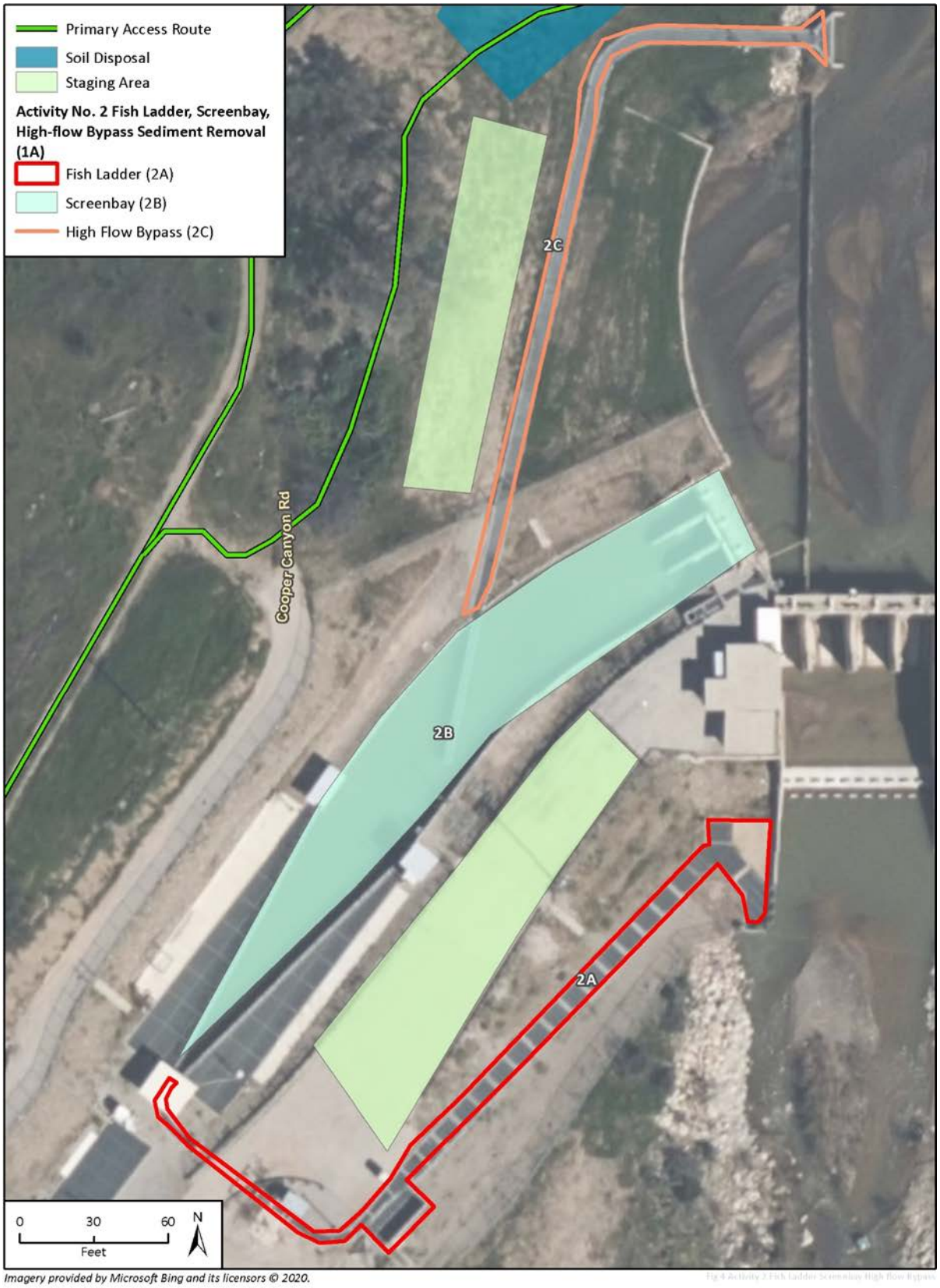
REMOVAL OF LARGE DEBRIS AND SEDIMENT

Removal of large debris (logs, large branches) and sediment would occur during dry periods when the fishway is not in operation, unless the work is necessary to maintain operations of the diversion and fish passage. Prior to removal of large debris and sediment, the Facility (canal or headworks) gates are closed to initiate a full shut down of the Facility, and to allow flows to recede such that maintenance equipment is not operated in flowing water. After the gates are closed, flow is redirected through the spillway, and the remaining water within the fish ladder, screenbay, and high-flow bypass is allowed to gravity-flow out of the Facility via the canal or fish ladder. A bank survey for federally-listed species (e.g., SC steelhead and California red-legged frog) would be conducted as the water recedes. If no listed species are observed in the Facility work would proceed.

An excavator would be staged adjacent to the access grates above the fish ladder, screenbay, and high-flow bypass, and would remove debris as needed by reaching the bucket into the Facility. Once flowing water has been re-directed through the spillway and no water is present in the fishway, it may be necessary to lower a small loader into the screenbay to remove, push, pile, or load debris. The excavated material would be loaded into dump trucks and removed to a disposal/storage site on Casitas property outside the river channel.

~~It is possible for water to pool within the lower portion of the fish ladder (i.e., entrance box and bottom five to seven steps of the ladder). If this portion of the fishway needs critical repair, block nets would be used to encourage fish and frogs to leave the Facility via the fish ladder, and prevent individuals from re-entering the Facility while the fish ladder entrance gates are closed. Any remaining water would be lowered only enough to conduct repairs by pumping water out of the fish ladder via two doubly screened pumps (5-10 horsepower) with 3-millimeter (mm) mesh to prevent impingement. This "residual water" pump system would be operational for up to two days depending on extent of repairs. The water would be directed to the canal which flows to Lake Casitas. Visual monitoring for listed species would be performed periodically while repair and maintenance activities are performed~~.

Figure 4 Activity 2 Fish Ladder, Screenbay, High-flow Bypass



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Activity No. 3 Rock Weir and Measurement Weir

Permit History

The construction of the rock weirs and measurement weir modification occurred as part of the permitted Robles Diversion Fish Passage Project in 2003-2004. Due to the lack of funding, four rock weirs were installed as an interim project in consultation with CDFW and NMFS. Ongoing fish passage monitoring conducted by Casitas at the diversion has detected 11 SC steelhead sized adults, with the last detection occurring in 2011, prior to the recent drought. Casitas has also documented approximately 1,300 juvenile and resident-sized *O. mykiss* moving upstream and downstream through Robles from 2006-2018, one putative kelt was observed below the radial gates in 2019 and one resident-sized *O. mykiss* was detected moving downstream in 2021. Given the interim project (as defined in the 2003 BiOp) has demonstrated passage, Casitas has postponed installing additional rock weirs due to the uncertain but long impending Matilija Dam Removal Project upstream of the Facility. Removal of Matilija Dam will greatly affect the area of the rock weirs, necessitating a high flow sediment bypass and other structural changes. Casitas provided compensatory mitigation in the form of on-site restoration to compensate for permanent impacts to jurisdictional areas (Appendix B). Therefore, no additional temporary or permanent impacts to jurisdictional areas requiring compensatory mitigation would result from maintenance of the rock weirs.

Facility Maintenance

The proposed maintenance activity would occur during the dry season when surface water is absent. It is anticipated maintenance and repair activities associated with the weirs would require 1 to 2 weeks to complete, depending on level of activities. Staging of heavy equipment would occur in upland areas on bare ground above the ordinary high-water mark and west of the channel where the weirs are located. Access to the weirs would be from Rice Road located east of the forebay across the Ventura River via the southern access road.

The existing concrete measurement weir may need repair if damaged to accurately measure flow from the Robles diversion, which is critical to operation of the water diversion and downstream BiOp-required releases (NMFS 2003). Repair of the bubbler line which runs down the upstream face of the weir may be necessary during wet conditions. Maintenance associated with the measurement weir should be minimal and limited to removal of debris by hand tools. Mechanical equipment (excavator or backhoe) may be required for large debris and sediment to be removed and placed downstream of the rock weirs. ~~and would occur only during dry conditions~~.

Since the weirs were modified in 2006 to include larger rock and more cabling, a total of 29 storms ranging from 1,400 to 23,000 cfs have occurred which demonstrates the longevity of the rock weirs functioning in the system. ~~a total of five storms have occurred generating flows in the river of 8,000 cfs or more:~~

- ~~10,000 cfs, 2/17/17;~~
- ~~8,485 cfs, 1/9/18;~~
- ~~9,100 cfs, 1/17/19;~~
- ~~12,000 cfs, 2/2/19; and~~
- ~~8,000 cfs, 2/14/19.~~

~~Additionally, 19 storms after the 2006 weir modification generated flows greater than 1,000 cfs in the Ventura River.~~ Following the larger storm events, only minor modifications to the weir passage

slots and placement of gravel on the upstream face of the weirs to fill the interstitial spaces and enhance flow through the passage slots was needed. Typically, overtopping of the cut-off wall occurs when flows exceed 7,000 to 8,000 cfs. Therefore, the maximum flow in the spillway channel (low flow channel) where the weirs are located is 7,000 to 8,000 cfs. When flows exceed this amount, overtopping of the timber cut-off wall occurs and flow is directed to the high-flow channel to the east. Given that large storm events have occurred in the Ventura River channel since weir modifications were made in 2006, and weirs have not incurred significant damage, it is not likely Casitas would need to make substantial repairs to the existing rock weirs.

The four rock weirs downstream of the measurement weir may need occasional realignment of boulders and re-cabling ~~following large storm events~~ to maintain fish passage slots and water elevation control. Every effort would be made to realign boulders by hand, but mechanical equipment may be required to adjust larger boulders, as necessary. Large- and medium-sized woody debris would be removed and placed downstream of the weirs with heavy equipment (e.g., excavator or backhoe). It is anticipated the work would occur in dry conditions and heavy equipment would be used for up to ~~4~~ 5 days to make necessary adjustments to boulders and relocate large woody material.

Figure 5 Activity 3 Rock Weir and Measurement Weir

Activity No. 4 Entrance Pool

Permit History

The construction of the entrance pool occurred as part of the permitted Robles Diversion Fish Passage Project in 2003-2004. Water flows through the entrance box to the entrance pool, providing attraction flows to the fish ladder. The entrance pool extends approximately 130 feet below the spillway and baffled apron structure and encompasses approximately 0.19 acre (8,238 square feet) of the Ventura River low-flow channel. Casitas provided compensatory mitigation in the form of on-site restoration to compensate for permanent impacts to jurisdictional areas resulting from the construction of the entrance pool as part of the Robles Diversion Fish Passage Facility Project (Appendix B). Therefore, no additional temporary or permanent impacts to jurisdictional areas requiring compensatory mitigation would result from maintenance of the entrance pool. The entrance pool would be maintained to original design contours as shown on Figure 2 in the Mitigated Negative Declaration for the Robles Diversion Dam Fish Screen and Fishway Project (Appendix C).

Facility Maintenance

The entrance pool is designed to enable fish to make the transition from the natural river channel into the fish ladder structure. Cleaning sediment/debris and emergent vegetation out of the entrance pool is necessary to maintain the energy-dissipating hydraulic jump, allow proper fish entrance gate operation, and ensure overall uniform hydraulic flow patterns throughout the entrance pool. This maintenance activity would include the excavation of the entrance pool to an 8- to 10-foot depth, and removal of a cluster of willow (*Salix lasiolepis*) in the downstream portion of the entrance pool. The sediment/debris became trapped in the entrance pool during intense storm events.

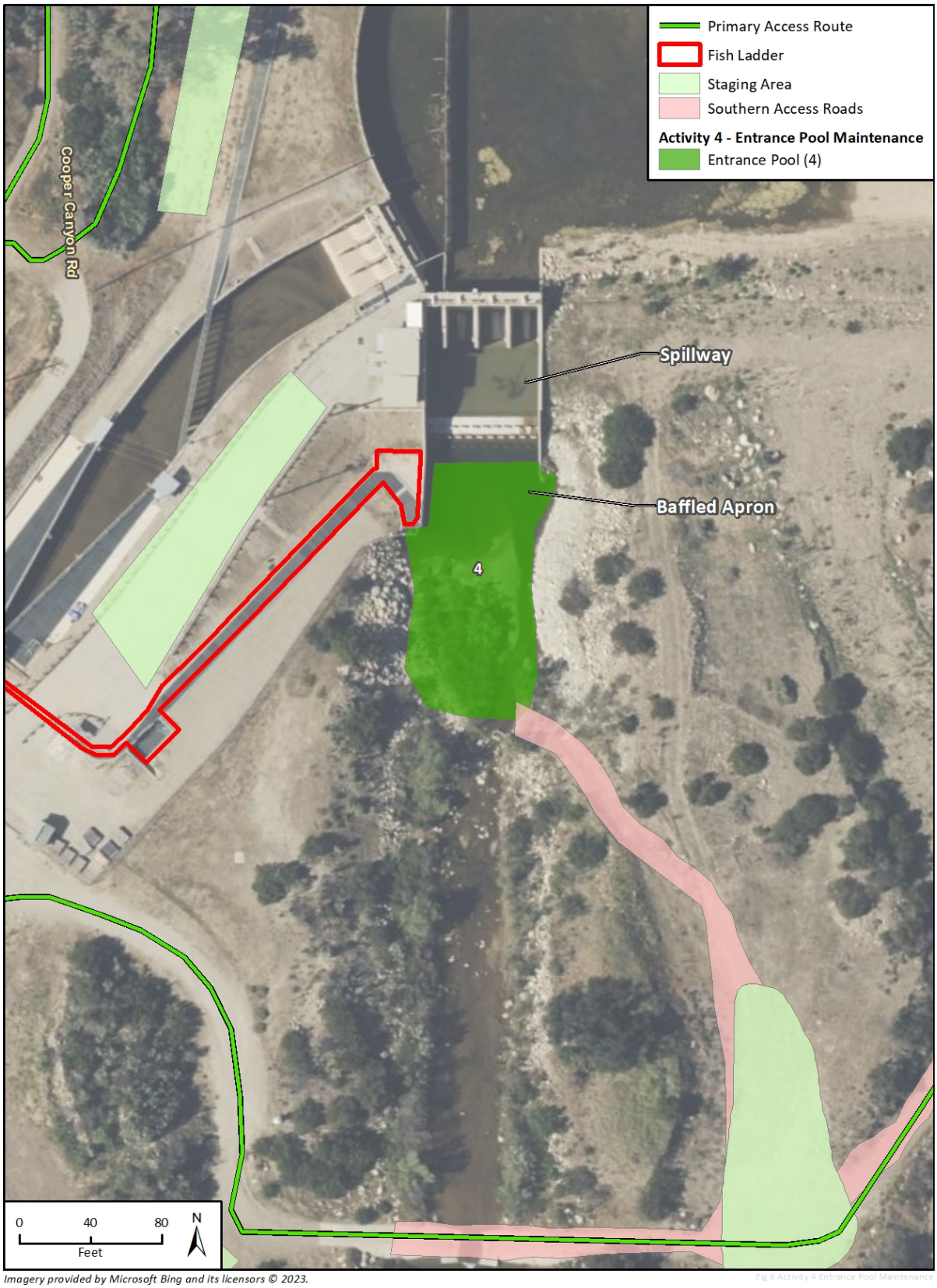
Sediment and vegetation removed would be stockpiled outside of jurisdictional areas in designated soil disposal sites. Re-contouring with boulder/cobbles/sediment would occur in the bottom of the entrance pool and adjacent areas to repair erosion along existing concrete abutments and riprap. The proposed maintenance activity would occur during times when surface water is absent.

The sediment/debris and vegetation would be removed from the entrance pool with equipment including a bulldozer, excavator or other loader and supporting vehicles (e.g., one dump truck) to transport and spread the sediment/debris in designated soil disposal areas. It is anticipated maintenance of the pool would require up to 3 to 4 weeks to complete. Staging of heavy equipment would occur in upland unpaved areas on the west and east of the channel adjacent to the entrance pool. Access to the entrance pool would be from Rice Road located east of the forebay across the Ventura River via the southern access road.

Similar to the entrance pool itself, the downstream area between the entrance pool and the measurement weir, referred to as the glide reach, was considered in the 2003 BiOp and ongoing monitoring by the Biological Committee.[2] Activities in this area would only occur if repairs are deemed necessary to *O. mykiss* passage.

[2] As described in the Facility's 2003 BiOp, the Biological Committee serves in an advisory role to the Management Committee and has primary responsibility of providing technical recommendations to the Management Committee on all steelhead issues. The Biological Committee consists of a representative from Reclamation, Casitas, NMFS, USFWS and CDFW. Reclamation serves as Chair of the Biological Committee. The Biological Committee meets annually each summer to review monitoring data from the preceding season's monitoring studies.

Figure 6 Activity 4 Entrance Pool



Activity No. 5 Concrete Structures

The Facility includes many concrete structures. Concrete repair may be necessary, on an as-needed basis, to preserve the structural integrity of the Facility. No changes to the existing footprint of the Facility would occur.

Concrete repairs may be made to the spillway, ~~concrete~~ protective rip-rap, measurement weir, and baffled apron, as needed (Figure 7) during dry conditions. In addition, concrete repairs may be made to the existing concrete-lined screenbay and extended upstream across the canal gates, and include the high-flow fish exit. Casitas staff or a contractor would clean and prepare the damaged area; build and place forms as necessary; place and finish concrete; remove forms and backfill area, as needed. All work would implement BMPs for concrete repair (Section 3).

Heavy equipment would be used to remove damaged concrete and perform concrete repairs. Equipment may include a pick-up truck, flat-bed, dump truck, concrete mixer, excavator, or other similar equipment and concrete pump (if needed). It is anticipated concrete repairs would require 1 to 2 weeks to complete. Heavy equipment would be staged in upland areas on bare ground west or east of the channel adjacent to the entrance pool. Access to the spillway would be either from Rice Road located east of the forebay across the Ventura River via the southern access road; or from Cooper Canyon Road headed north toward the Facility.

Work on the concrete structures would not ~~alter~~ expand the existing footprint of the Facility, and no permanent or temporary impacts to jurisdictional areas requiring compensatory mitigation are anticipated.

Activity No. 6 Routine Maintenance

Timber Cut-off Wall Repair and Maintenance (6A)

The timber cut-off wall is 325 feet long and approximately ~~30~~ 25 feet deep; rocks and boulders are placed at depth on the upstream and downstream sides and native material is placed to fill the voids. In the past, the timber wall has been damaged by extremely high river flows and fire, and it would occasionally need maintenance and repair. The maintenance/repair would include replacement of the timbers and rocks/backfill and compacting and recontouring the approach and downstream slopes. Repair of the timber cut-off wall also may require excavation to the foundation elevation, timbers in damaged section replaced, the wall straightened, and placement and re-compaction of the boulders/rocks and replacement of the native backfill within a 15,757 square foot area (0.36 acre) surrounding the base of the wall. Emergent and woody vegetation along the wall within this area would be removed during excavation to assess the extent of the damage and access the timber cut-off wall. Repair and maintenance would not be performed under the routine maintenance programmatic agreements if surface water is present in the work area. Based on the extent of damage and conditions, it may be necessary to perform temporary emergency repairs to the Facility during wet conditions until more permanent repairs can be made during dry conditions. Emergency actions which require immediate repair to protect life and property are addressed separately on a case-by-case basis with state and federal regulatory agencies, and are not part of the proposed action.

Equipment that may be used includes an excavator, bobcat, dump trucks, front-end loader, backhoe, light-duty pickup trucks, hand operated power tools, and vibratory compactor.

Figure 7 Activity 5 Concrete Structures

The duration for the work would depend on the extent of damage and the required remedy. Casitas made significant repairs to the timber cut-off wall in November 2019 to repair damaged ~~portions of the wall, which were burned in~~ from the Thomas Fire. It is anticipated that future repairs made to the wall would require up to 30 working days to complete. It is anticipated that repairs could be needed once every five years, although the frequency would depend on the ~~degree of damage to the structure~~ number and magnitude of damaging high flows or other events (e.g. fires).

Vegetation that develops near the top of the timber cut-off wall prevents uniform overtopping of flows and creates catch points for debris to accumulate. In the years when repairs to the timber wall are not made, woody vegetation with a diameter of three inches or less would be cut to ground level with hand operated power tools. Maintaining low or no vegetation along the wall would help to ensure that overtopping flows are dissipated over a larger area, minimizing erosion at constricted sections within the Ventura River and reducing water elevations in the forebay as designed. Cut vegetation would be disposed of outside of jurisdictional areas, off-site. Vegetation trimming would occur outside the bird nesting season, and would usually require two to five days to complete.

Access to the timber cut-off wall would be from Rice Road to through the staging area located east of the forebay (Figure 8).

Table 2 shows the extent of temporary impacts to potentially jurisdictional areas resulting from timber cut-off wall repair and vegetation maintenance activities. Vegetation removal would not involve excavation or backfill.

Table 2 Anticipated Temporary Impacts to Ventura River from Activity 6A

Feature	Waters of the U.S.[1]		Waters of the State[2] (acres/linear feet)	CDFW Jurisdictional Area[2] (acres/linear feet)
	Non-wetland Waters of the U.S. (acres/linear feet)	Wetland Waters of the U.S. (acres/linear feet)		
Vegetation trimming/removal	0.36/325	–/–	0.36/325	0.36/325

CDFW = California Department of Fish and Wildlife

[1] Calculated to Ordinary High-Water Mark or edge of wetland

[2] Calculated to top of bank or edge of riparian

Debris Fence (6B)

The timber debris fence lies upstream of the diversion headworks in the forebay (Figure 8). The ~~racks of the~~ fence deflects debris away from the headwork gates and toward the spillway gates. Over time the fence collects woody debris, which requires removal. This maintenance activity would involve the removal of debris from the fence, and the repair or replacement of damaged wood timbers as needed to preserve the structural integrity and functionality of the fence.

A backhoe and light trucks are usually needed to remove larger debris and support repairs to the timber debris fence. If possible, debris would be removed by hand. Removed debris would be disposed of outside of jurisdictional areas. Repair of the timbers would be completed in dry conditions. It is anticipated that most debris removal and repairs would require up to 1 to 2 weeks to complete. Repairs made to the fence would coincide with Activity 1's schedule. Therefore, access to the debris fence would be through the forebay from the entrance to the Facility off Rice Road, located east of the forebay. Removing material from the debris fence would not result in permanent or temporary impacts to the river channel, and no compensatory mitigation would be required for these activities.

Figure 8 Activity 6 Routine Maintenance

Radial Gates (6C)

The radial gates are painted periodically to prevent deterioration (rusting). Painting is anticipated to occur approximately once every two to five years, and work would be completed within 1 to 2 weeks. Access to the radial gates is along the timber cut-off wall (Figure 8). This effort would occur when the spillway area is dry. Small equipment and hand tools are used to sandblast and prime the gates before they are painted. BMPs would be implemented during this maintenance work to minimize deposition of debris (i.e., paint chips) and other materials into the Ventura River. A lift, light trucks, and scaffolding are utilized to complete the painting project. Replacement of seals may also be necessary, as they wear or become damaged. Seals are replaced by hand using a ladder and hand tools. Additional unplanned maintenance on the radial gates may be periodically required in order to maintain proper functionality of the gates. Painting the radial gates would not result in permanent or temporary impacts to the river channel, and no compensatory mitigation would be required for this activity.

Instrumentation (6D)

Data is collected to document that the Facility is operated in compliance with the operations approved by NMFS (NMFS 2003). Sensors installed at the Facility allow for calculating the amount of inflow into the Robles forebay, diversion, and the flow routed through the fishway, auxiliary water supply pipeline, and the spillway. Information collected is provided to NMFS and CDFW on an annual basis. Levelers, bubblers, transducers, etc. would require replacement when they malfunction or become damaged.

A flow measurement structure equipped with ~~multi-path,~~ ultrasonic velocity and water level measurement transducers is located in the fishway, downstream of the screenbay and upstream of the fish counter. A second flow measurement structure is located in the high-flow fish bypass ~~behind the debris fence~~. The auxiliary flow pipe is also equipped with a flow measurement transducer.

Level sensors are located in the forebay between the spillway and canal gates; in the high-flow fish bypass; screenbay; fishway (upstream and downstream of the Vaki Riverwatcher fish counter); and within the fish ladder (inside the fish ladder and outside the entrance to the fish ladder at the entrance pool). Two level sensors would be installed behind the fish screens to provide additional input to support screen testing that is underway and for operational and monitoring improvements. Additionally, there <u>are</u> ~~is one~~ sensor<u>s</u> located in the canal, outside of the Ventura River.

A bubbler is located at the measurement weir, upstream of the four rock weirs. The bubbler has a conduit mounted to the upstream face of the measurement weir. The conduit is occasionally damaged during heavy storms and the hose inside the conduit may need to be replaced. The conduit can also become buried with sediment, preventing its operation. The sediment would be removed to restore operation.

During ~~the course of~~ operations, instruments on the measurement weir may become damaged by flows or have operation interrupted due to accumulation of sediment or debris. In most cases, <u>depending on flow conditions</u>, instrumentation can be accessed allowing for its removal, repair, and subsequent reinstallation. Due to the shape of the weir, the amount of sediment that accumulates is expected to be minor and removal would be accomplished by hand or with hand tools. If the removal cannot be accomplished using hand tools, maintenance would be deferred to a period of dry conditions. Similarly, any major repairs to the measurement weir itself, which would require

heavy equipment, would be conducted under dry conditions. Repair and maintenance of instruments would typically be completed within 1 to 2 weeks, and would not expand the footprint of the measurement weir or result in alterations to the river channel. These repairs would not expand the existing footprint of the weir, and no permanent or temporary impacts to jurisdictional areas requiring compensatory mitigation are anticipated.

If maintenance requires heavy equipment, there may be a delay before the onset of dry conditions when the maintenance can be performed. During this time, some or all of the instruments may be out of service and unable to make measurements. Casitas would use other methods, such as calculations based on other measuring instruments within the Facility, to estimate river flows. In addition, a staff gauge would be marked onto the measurement weir and would provide a redundant method to estimate flows if all other instrumentation fails. ~~be painted onto the measurement weir in summer 2021 and would be resistant to damage~~. Using these methods would ensure that river flows can continue to be estimated while the primary instruments are pending repairs.

Road Maintenance (6E)

Road maintenance and repair would occur as needed (estimated annually) on Reclamation property during dry river conditions. It is anticipated road maintenance would require 2 to 3 weeks to complete, annually. The southern access road begins at the entrance gate to the Facility at the terminus of North Rice Road and continues southwest across the Ventura River. This road is typically used by light trucks and passenger vehicles at flows under 15 cfs. The northern access road traverses the Ventura River upstream of the forebay. This road is generally used by contractors to complete the forebay restoration project (Activity 1), annually. The roads would be graded and shaped each year, if needed, during dry conditions. Road maintenance may involve use of heavy equipment to re-contour and re-compact access roads including an excavator, grader, bulldozer or backhoe.

Table 3 shows the extent of temporary impacts to potentially jurisdictional areas resulting from road maintenance activities.

Table 3 Anticipated Temporary Impacts to Ventura River from Activity 6E

Feature	Waters of the U.S.[1]		Waters of the State[2] (acres/linear feet)	CDFW Jurisdictional Area[2] (acres/linear feet)
	Non-wetland Waters of the U.S. (acres/linear feet)	Wetland Waters of the U.S. (acres/linear feet)		
Southern and Northern Access Roads	0.37[3]/1,000	–/–	0.37[3]/1,000	0.37[3]/1,000

CDFW = California Department of Fish and Wildlife

[1] Calculated to Ordinary High-Water Mark or edge of wetland

[2] Calculated to top of bank or edge of riparian

[3] Calculation excludes the portion of the access road which traverses the primary placement area (previously calculated in Activity 1B impacts) and the portion of the access road which crosses over the previously permitted concrete measurement weir.

10. Best Management Practices

The environmental BMPs presented in this section have been required pursuant to previously issued permits, authorizations and consultations with state and federal resource agencies, including under Section 7 of the ESA. Casitas has implemented these BMPs during past maintenance and repair projects. The BMPs may be revised or augmented pursuant to the documents issued by NMFS and USFWS for the annual maintenance and repair program. Casitas would implement BMPs as they apply to each activity. Each spring, Casitas would prepare a maintenance and repair plan for the next fiscal year (July 1 – June 30), which will include a list of repair and maintenance activities planned, schedule and timing, and associated BMPs to be implemented for each activity.

A table of BMPs to be implemented for each activity is provided in Appendix F.

BMP-1 Work Period (Activities 1-6)

Maintenance and repair activities within the Ventura River shall occur only when the river is dry, with one exception. If water is present during the fish passage season, the Activity 2 work area would be isolated from the Ventura River channel by shutting down the Facility and allowing water to recede only enough to conduct the repair. ~~If needed to access a specific work area, two double-screened pumps (5-10 horsepower) with 3 mm mesh may be used to route the remaining pooled water from the lower portion of the fish ladder into the canal before work is initiated.~~ No earthwork shall be conducted during rain events, or if 0.25 inches or more of rain is forecast within 12 hours of scheduled work.

BMP-2 Environmental Training (Activities 1-6)

Prior to initiation of all maintenance activities (including staging and mobilization), all workers associated with project activities shall attend a Worker Environmental Awareness Program (WEAP) training, conducted by a qualified biologist, to aid workers in recognizing special status biological resources that may occur in the project area. Casitas staff will attend a WEAP training ~~annually~~ in years when any of Activities 1-6 are included in the annual maintenance and repair plan. This training will include information on the biology and ecology of protected species, and the measures being incorporated to avoid take (e.g., for California red-legged frog (CRLF), least Bell's vireo (LBVI), SC steelhead, southwestern willow flycatcher (SWFL), critical habitat for SWFL and SC steelhead, and other species and critical habitat protected under the ESA).

The program shall include identification of sensitive species and habitats, a description of the regulatory status and general ecological characteristics of sensitive resources, and review of the limits of construction and measures required to avoid and minimize impacts to biological resources within the work area. A poster and a fact sheet conveying this information shall also be prepared for distribution to all contractors, their employees, and other personnel involved with performing the maintenance or repair 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 project supervisor shall be responsible for ensuring crew members adhere to the guidelines and restrictions designed to avoid impacts to sensitive species and their habitat.

BMP-3 Pre-construction Wildlife Surveys (Activities 1-6)

Within one week prior to the commencement of project activities, a qualified wildlife biologist shall conduct pre-construction surveys in all areas associated with project activities (work area, staging

area, and access route) with focus on special status species including San Bernardino ringneck snake, coast patch-nosed snake, coast horned lizard, two-striped garter snake, southwestern pond turtle and arroyo chub.

A qualified biologist will conduct a survey within the project area locations and document existing conditions and search for special status species. If San Bernardino ringneck snake, coast patch-nosed snake, coast horned lizard two-striped garter snake, southwestern pond turtle, or arroyo chub are found in harm's way, individual animals shall be relocated to similar habitat away from construction activities, at least 200 feet from restoration areas in suitable habitat for the species.

BMP-4 Steelhead Pre-construction Survey (Activity 2)

For avoidance of effects to SC steelhead, as deemed appropriate by the Casitas Fisheries Program Manager, and in accordance with the existing BiOps or other regulating documents, Casitas staff will conduct a bank survey at the Facility for SC steelhead prior to commencing repair and maintenance activities within the fish ladder, screenbay, and high-flow fish bypass (Activity 2), if flowing water is present, a full shut down is required, and it is safe to do so. The critical maintenance and/or repair will be performed to maintain diversion and fish passage operations. If SC steelhead are observed during the survey, further coordination with Reclamation, NMFS, and CDFW biological staff will be conducted to determine the appropriate course of action before proceeding with work.

BMP-5 CRLF Pre-construction Surveys (Activities 1, 3, 4, 6A and 6E)

Prior to ground disturbing activities within Ventura River, Casitas staff or their contractor(s) or representative(s) will conduct surveys to confirm there are no CRLF in the Facility. Per USFWS guidance (USFWS 2005), and unless otherwise provided for by USFWS, because site specific conditions may warrant modifications to the timing of survey periods for CRLF, modified survey protocols shall be implemented as follows, prior to the start of maintenance or repair projects in suitable habitat for CRLF:

- One nighttime presence/absence survey~~s~~ prior to the start Activities 1, 3, 4 and 6A.
- On~~e~~e clearance survey immediately prior to the start of Activities 1, 3, 4 and 6A.

If CRLF is detected during the project, the observer shall notify the USFWS, CDFW and Reclamation biological staff within one workday of the detection and further coordination with the agencies will be conducted to determine the appropriate course of action before proceeding with work.

BMP-6 LBVI and SWFL Pre-Construction Survey (Activities 1, 3, 4, 6A, 6E)

If project activities must begin during the breeding season (February 1 – August 31), then a pre-construction nesting bird survey for LBVI and SWFL will be conducted immediately prior to project activities within suitable habitat for the species. The survey will be conducted by a qualified biologist who possesses a valid 10(a)(1)(A) Recovery Permit, State Memorandums of Understanding (MOUs), and experience with the target species. If LBVI or SWFL nests are found, project activities would be set back a minimum of 500 feet from nest sites or avoided until the young have fledged and are no longer dependent on protected areas for foraging.

BMP-7 Cover Excavations (Activity 6A)

Any steep-walled excavations that may trap CRLF which will be left open overnight in areas within or adjacent to the Ventura River shall be covered and checked for CRLF before resuming activities in the excavation.

BMP-8 Nesting Birds (Activities 1-6)

If maintenance or repair activities must begin during the breeding season (February 1 – August 31), a pre-construction nesting bird survey shall be conducted no more than seven days prior to initiation of ground disturbance and vegetation removal activities. Although presence of nesting migratory birds is unlikely, special emphasis shall be placed on potential occurrences of nests of SWFL and LBVI. The nesting bird pre-construction survey shall be conducted on foot and will include the entire area of disturbance, plus a 500-foot buffer around the work area. Inaccessible areas (e.g., private lands) will be surveyed from afar using binoculars to the extent practical. 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 so that take is avoided, and the area 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 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.

BMP-9 On-site Biological Monitoring (Activities 1, 2, 3, 4, 5, 6A and 6E)

A qualified biological monitor (with all of the required collection permits) will be on site during all project operations that involve removal of the first 12 inches of ~~soil~~ sediment/substrate, water diversions, de-watering, exposed (excavated) work areas, and work within sensitive habitat areas where sensitive species may be present. After the previously specified work activities are completed that require a monitor to be on site, the monitor will then remain on site for the remainder of the project (as work occurs in the Ventura River) for no less than two days per week, for a minimum two-hour period per day. Dependent upon work conditions and/or prolonged project activities, Casitas may potentially arrange for a decrease in biological monitoring with Reclamation, USFWS, NMFS, and CDFW.

BMP-10 Staging Equipment (Activities 1-6)

Staging and laydown areas shall be unvegetated areas and previously disturbed sites, outside of jurisdictional areas.

BMP-11 Pollutant Management (Activities 1-6)

All vehicles and equipment shall be in good working condition and free of leaks. Stationary equipment such as motors, submersible sump pumps, generators, and welders, located within or adjacent to the river shall be positioned over drip pans. Stationary heavy equipment shall have suitable containment to handle a catastrophic spill/leak. No debris, soil, silt, sand, bark, slash, sawdust, rubbish, construction waste, cement or concrete or washings thereof, asphalt, paint, oil or

other petroleum products or any other substances which could be hazardous to aquatic life, or other organic or earthen material from any logging, construction, or other associated project-related activity shall be allowed to contaminate the soil and/or enter into or placed where it may be washed by rainfall or runoff into the Ventura River. Any of these materials, placed within or where they may enter a stream, shall be removed immediately and disposed of properly. When project-related activities are completed, any excess materials or debris shall be removed from the work area.

BMP-12 Pollution Prevention (Activities 1-6)

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

BMP-13 Material Storage (Activities 1-6)

Materials shall be stored on impervious surfaces or plastic ground covers to prevent any spills or leakage. Material storage shall be at least 100 feet from flowing water that could come in contact with the Ventura River. Any material/spoils from activities shall be located and stored 100 feet from potential jurisdictional areas as practicable. Construction materials and spoils shall be protected from stormwater run-off using temporary perimeter sediment barriers such as berms, silt fences, fiber rolls, covers, sand/gravel bags, and straw bale barriers, as appropriate.

BMP-14 Tracking Loose Material (Activities 1-6)

BMPs such as street sweeping, vacuuming, and rumble plates will be implemented to prevent the off-site tracking of loose construction and landscape materials, as appropriate. In addition, fugitive dust control measures, such as periodic watering via water trucks, will be implemented as appropriate to minimize the release of particulates into the air.

BMP-15 Stabilize Exposed Soil (Activities 1, 4, 6A and 6E)

To limit erosion, minimize soil disturbance work in channels and basins to that which can be stabilized prior to rain events.

BMP-16 Avoid Road Base Discharge (Activities 1 and 6E)

Do not place or spill road base, fill, or sediments beyond the previously established roadbed when working adjacent to channel bottom.

BMP-17 Concrete Washout Protocol (Activity 5)

Plastic-lined sandbag concrete wash out pits stationed in uplands are required where concrete placement occurs. A vacuum system may be utilized when sandblasting or jackhammering of concrete occurs to avoid release of materials into channels or surface waters. If a vacuum system is not utilized, appropriate BMPs (i.e., visqueen plastic sheeting) to contain the work area, collect/contain concrete debris, and prevent such materials from entering the Ventura River (even in dry conditions) shall be implemented. Fluids associated with the curing, finishing, and wash-out of concrete shall not be discharged to the channel or basin. Concrete wastes (liquid, dust, solids) shall be stockpiled separately from sediment and protected by erosion control measures to prevent discharge to the Ventura River. Conduct appropriate waste management practices based on

considerations of flow velocities, site conditions, suitability of erosion control materials, and construction costs.

BMP-18 Site Materials and Refuse Management (Activities 1-6)

All food-related trash shall be disposed in closed containers and removed from the project area each day during the construction period. Construction personnel shall not feed or otherwise attract wildlife to the construction area. At project completion, all project-generated debris, vehicles, building materials, and rubbish shall be removed from the impact area.

BMP-19 Re-fueling and Maintenance (Activities 1-6)

All re-fueling, cleaning, or maintenance of equipment will occur at least 100-feet from the Ventura River.

BMP-20 Responding to Spilled Materials (Activities 1-6)

A Spill Prevention Plan will be prepared and implemented throughout the project. The Spill Prevention Plan will identify steps to be taken including notification of appropriate local, state, and federal agencies in the event of significant spills. Any spillage of material will be stopped if it can be done safely. The contaminated area will be cleaned immediately, and any contaminated materials properly disposed. For all spills, the project foreman or other designated liaison will notify Casitas immediately.

BMP-21 Best Management Practice to Prevent Erosion (Activities 1-6)

Spoil shall be spread in the designated disturbed area outside of jurisdictional areas (with the exception of sediment to be placed in the primary placement area, as discussed for Activity 1B). Spoil shall be spread to avoid or minimize risk of erosion.

BMP-22 Speed Limits (Activities 1-6)

Project-related vehicles will observe a daytime speed limit of 15 miles per hour throughout the impact areas. Night work will be avoided to the maximum extent possible; however, if night work must occur (e.g., Activity 2), the speed limit for transport and spreading material shall be reduced to 10 miles per hour. Off-road traffic outside of designated impact areas is prohibited.

BMP-23 Noxious Weeds and Invasive Species (Activities 1-6)

To avoid the introduction or spread of noxious weeds and invasive biota into areas not infested, Casitas staff or its contractors, with the assistance of the biological monitor, will implement the following measures:

a. Educate construction supervisors and managers on weed identification and the importance of controlling and preventing the spread of noxious weed infestations;
b. Conduct a follow-up inventory of the construction area to verify construction activities have not resulted in the introduction of new noxious weed infestations;
c. If new noxious weed infestations are located during the follow-up inventory, the appropriate resource agency shall be contacted to determine the appropriate species-specific treatment methods for removal and the noxious vegetation shall be removed; and

d. Implement measures as appropriate from Reclamation Technical Memorandum No. 86-68220-07-05. Inspection and Cleaning Manual for Equipment and Vehicles to Prevent the Spread of Invasive Species. 2012 Edition.

BMP-24 Noxious Vegetation Removal (Activities 1-6)

Any noxious vegetation identified by Casitas staff or biological monitor shall be removed from the work area, soil disposal areas, upland areas, and around the perimeter of the concrete-lined portions of the Facility. Noxious vegetation shall be disposed of in a manner and at a location to prevent its re-establishment. Noxious species will be removed by hand or by hand-operated power tools, rather than by chemical means, where practicable. Casitas staff or contractors will perform chipping of giant reed (*Arundo donax*) and disperse chipped material in designated locations where materials would not wash downstream or be allowed to propagate. All cut/removed noxious vegetation will be taken to a dump as a destruction load.

11. Annual Monitoring and Reporting Program

The ~~annual~~ implementation of the Annual Maintenance and Repair program with the adopted environmental BMPs and long-term permits is shown on Figure 9. Each spring, Casitas will prepare a maintenance and repair plan for work planned to be conducted during dry conditions within the work period in the upcoming ~~next~~ fiscal year (July 1 – June 30). The plan may be updated during the year as field conditions change. Under the proposed action, Casitas will identify the proposed maintenance and repair work for the year, BMPs to implement with the planned maintenance work, including any seasonal or geographic restrictions affecting the timing, methods, and limits of the planned work. It will be necessary for Casitas biologists to conduct site visits to certain locations, and to utilize a qualified specialized biologist in some instances. Using the information from Casitas staff (and a qualified biologist, if necessary), the annual maintenance and repair plan will be completed. A list of work planned for the Facility will be submitted to the USACE, CDFW, RWQCB, USFWS, NMFS, VCWPD and Reclamation at that time.

~~With regard to~~ As mentioned in Section 9.2 within the *Sediment Removal (1A)* discussion, regarding excavation of sediment from the forebay, Casitas will conduct a photogrammetric aerial survey in April/May each year, following the rain season and prior to annual excavation of the forebay. This post-rain season survey will be used in conjunction with the annual fill design plan to determine how much sediment can be placed downstream each year. The quantities of sediment to be placed downstream of the timber cut-off wall each year, and results of the photogrammetric aerial survey, will be presented in the annual maintenance and repair plan.

Casitas will provide all regulatory agencies with the Annual Maintenance and Repair Plan for the next fiscal year by May 30 each year. Work will commence as described in the Annual Maintenance and Repair Plan, and in accordance with the program's permits and authorizations.

~~Casitas expects all regulatory agencies to issue a Notice to Proceed (NTP) for permitted activities within 30 days of receiving the list of planned maintenance and repair activities. If Casitas does not receive a response within 30 days, it shall be assumed the NTP is issued and work can begin~~.

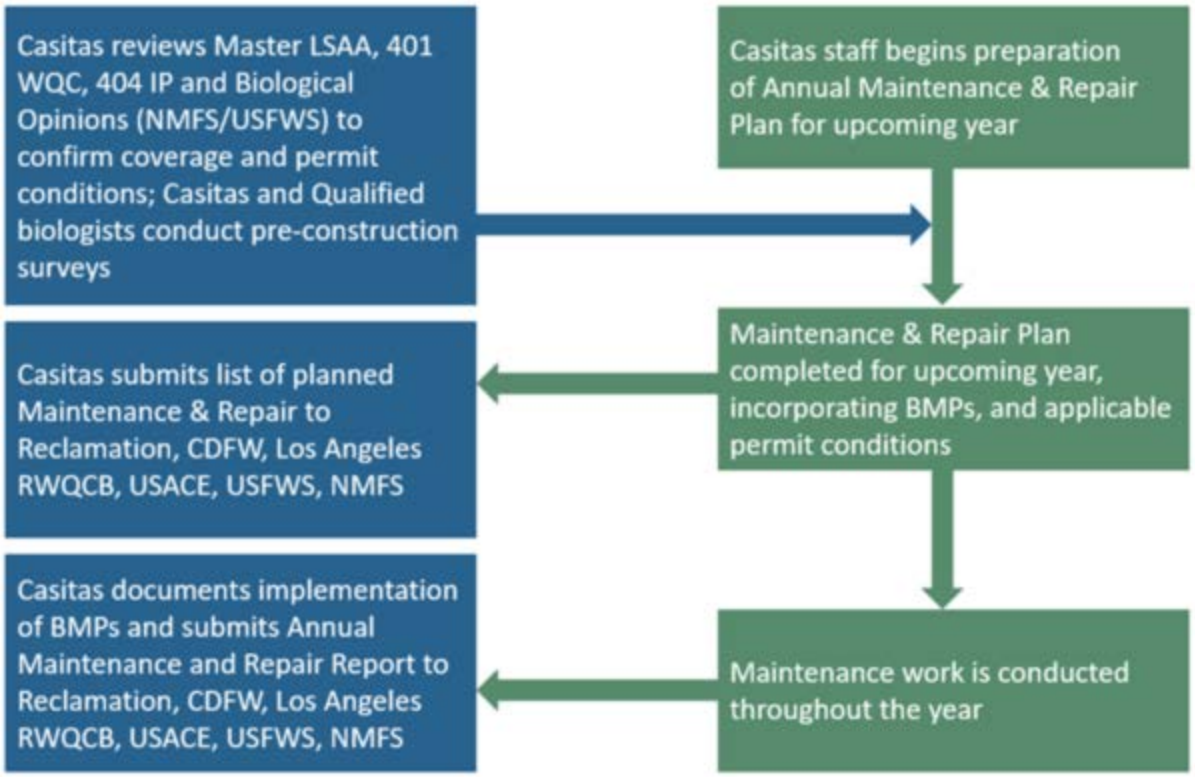
Casitas will coordinate the implementation of the environmental BMPs (Section 3) and permit conditions during the course of the year, as described above. At the end of the year, an annual report documenting all work performed and the successful use of the BMPs will be submitted to USACE, CDFW, RWQCB, USFWS, NMFS, VCWPD and Reclamation for their records. Table 4 provides

critical milestones for the proposed program. Section 5 includes a template for year-end reporting to the agencies.

Table 4 Annual Repair and Maintenance Program Milestones

Annual R&M Program Milestones	Timeframe
Pre-Restoration/Post-Winter Survey (Forebay)	April/May
Annual Maintenance and Repair Plan submitted to the resource agencies	May 30
Meeting to discuss Plan with Agencies/NTP	June
Perform Maintenance and Repair Work	July through November (dry conditions)
Post-Restoration Survey (Forebay)	October
Annual Monitoring Report submitted to resource agencies	May 30

Figure 9 Annual Monitoring and Reporting Flow Diagram



12. Annual Reporting

On an annual basis, Casitas will provide the regulatory agencies with information regarding Casitas' routine maintenance and repair activities for the previous and current year. The information will be submitted in spreadsheet format under a cover letter signed and dated by the General Manager by May 30, and will include the following.

12.1 Maintenance Activity

- Activity number
- Description of activity
- BMPs implemented
- Start and end dates of the maintenance activity
- If the activity requires the removal of sediment, the starting and ending elevations and the cubic yards of sediment removed will be provided
- If vegetation is removed, Casitas will describe the type of vegetation (i.e., native or invasive) and the method of removal and site of disposal
- For vegetation removal in Ventura River, the linear feet of removal will be provided
- Comments regarding condition of Facility will be noted as needed

12.2 Forebay Sediment Removal and Relocation

The Annual Report will also include the results of the photogrammetric aerial survey to be conducted in April/May each year, and a discussion including the following components:

- Proposed Sediment Removal and Relocation Activity ~~(to occur in August/September each year)~~
- Discussion of Previous Rain Events
  - Specify if over-topping of timber cut-off wall occurred (i.e., when, and the duration of over-topping)
  - Magnitude and duration of storm events post-placement of sediment through April 30
- Adaptive Management Strategy
  - A summary of the proposed approach for sediment removal in August/September (including quantities of sediment to be removed and relocated ~~based on approved 2019 fill design~~.

13. Surrounding Land Uses and Setting

Land uses around the project site are predominantly agricultural and residential.

14. Other Public Agencies Whose Approval is Required

Casitas is the Lead Agency under CEQA with responsibility for approving the project. There are two CEQA Responsible Agencies for the project, where "responsible agency" is defined in CEQA as any public agency other than the CEQA Lead Agency which has discretionary approval authority over the

project. For the proposed Program, the two CEQA Responsible Agencies are the CDFW and the Los Angeles RWQCB. Contact information is provided below.

California Department of Fish and Wildlife, South Coast Region
3883 Ruffin Road
San Diego, California 92123

Regional Water Quality Control Board, Los Angeles Region
320 West 4th Street, Suite 200
Los Angeles, California 90013

15. Have California Native American Tribes Traditionally and Culturally Affiliated with the Project Area Requested Consultation Pursuant to Public Resources Code Section 21080.3.1?

On behalf of Casitas, Rincon Consultants, Inc. contacted the Native American Heritage Commission (NAHC) on March 24, 2020, to request a Sacred Lands File (SLF) search of the project site. The NAHC replied on April 2, 2020, with positive results and listed six contacts who may have local knowledge of the area. As the CEQA lead agency for the project, Casitas then conducted "government to government" consultation with the identified Native American tribes for project compliance with Assembly Bill 52 (AB 52). As of the time of preparation of this IS-MND, one Native American tribe traditionally and culturally affiliated with the project area has requested consultation pursuant to PRC Section 21080.3.1. Julie Tumamait-Stenslie, Chairperson of the Barbareño/Ventureño Band of Mission Indians, requested Native American monitoring during project-related ground disturbance associated with Activities 1A and 1B. On November 15, 2024, proposed revisions to mitigation measures were reviewed and discussed with Matthew Vestuto, current Chairperson of the Barbareño/Ventureño Band of Mission Indians, and worker environmental awareness training was requested as a result of these discussions.

Environmental Factors Potentially Affected

This project would potentially affect the environmental factors checked below, involving at least one impact which is "Potentially Significant" or "Less than Significant with Mitigation Incorporated" as indicated by the checklist on the following pages.

☐	Aesthetics	☐	Agriculture and Forestry Resources	■	Air Quality
☐	Biological Resources	■	Cultural Resources	☐	Energy
■	Geology/Soils	☐	Greenhouse Gas Emissions	☐	Hazards and Hazardous Materials
☐	Hydrology/Water Quality	☐	Land Use/Planning	☐	Mineral Resources
☐	Noise	☐	Population/Housing	☐	Public Services
☐	Recreation	☐	Transportation	☐	Tribal Cultural Resources
☐	Utilities/Service Systems	☐	Wildfire	☐	Mandatory Findings of Significance

Determination

Based on this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

■ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions to the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "less than significant with mitigation incorporated" impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potential significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature	Date
Printed Name	Title

Environmental Checklist

1 Aesthetics

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
a. Have a substantial adverse effect on a scenic vista?	☐	☐	■	☐
b. Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	■
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	■	☐
d. Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?	☐	☐	■	☐

a. Would the project have a substantial adverse effect on a scenic vista?

The project site is located along the Ventura River near the city of Ojai in the Ojai Valley portion of Ventura County; due to its location along the river, the project is intrinsically within a visually scenic area but does not have the elevation to affect the qualities of scenic vistas.

The County of Ventura General Plan Resources Element identifies the viewsheds of lakes (excluding land designated Existing Community) and State- or County-designated scenic highways as being worthy of special protection, including Lake Casitas and Matilija Reservoir near Ojai (County of Ventura 2019). Conservation of scenic resources is most critical where the resources will be frequently and readily viewed, such as from a highway, or where the resource is particularly unique (County of Ventura 2019). The project site is located within the boundaries of the Ojai Valley Area Plan but is not located in a designated Scenic Resource Protection Overlay Zone for lakes or ridgelines.

The City of Ojai General Plan does not specifically designate scenic vistas, but the City's General Plan Open Space Element does state scenic open space includes those areas with views of the city and

featuring the aesthetic quality of the Ojai Valley's ridgelines (City of Ojai 1987). Although surrounded by mountainous areas, the relatively flat nature of the Ojai Valley floor means scenic vistas of mountains and ridgelines are commonly obscured by intervening structures and vegetation in the project area. Continued implementation of the R&M Program would involve the presence and use of equipment and machinery within and around the project site. These activities may temporarily obstruct or degrade scenic views for residents and motorists in the immediate vicinity of the Facility; however, such effects would be temporary, restricted to active construction activities, and would be consistent with ongoing repair and maintenance activities at the Facility. Following construction, visual characteristics of the area would be the same as present conditions. There would be no permanent changes affecting scenic vistas. Potential impacts to scenic vistas from construction and operation of the proposed R&M Program would be less than significant.

LESS THAN SIGNIFICANT IMPACT

b. Would the project substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

According to the California Department of Transportation, the nearest eligible State Scenic Highway to the project site is State Route 33 (SR 33), located approximately 0.3 mile east of the Facility. The proposed R&M Program would not result in damage to trees, historic buildings, rock outcroppings, or similar scenic resources within the SR 33 viewshed. Therefore, the project would not result in a substantial adverse effect on scenic resources visible from a state scenic highway and no impact would occur.

NO IMPACT

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

As stated in the Project Description Section 13, *Surrounding Land Uses and Setting,* land uses around the project site are predominantly agricultural and rural residential. Figure 2, *Project Area*, shows the Facility's location within the Ventura River, and shows agricultural and rural residential uses to the east, on either side of Rice Road, and open space to the west, beyond Cooper Canyon Road. The Ventura River continues to the north and south of the Facility. In general, the area surrounding the Facility has a "small town" visual character including residential uses, as well as recreational open space, agricultural uses, and undeveloped mountain ridges.

The project area spans the city of Ojai and small portions of unincorporated Ventura County. Title 10, Chapter 2, Article 20 of the Ojai Municipal Code contains the City's design review policies. Pursuant to California Government Code 53091, the project is not subject to the design review policies contained in the City's zoning regulations, because local zoning ordinances do not apply to the location or construction of facilities for the production, generation, storage, treatment, or transmission of water. The project would not conflict with regulations governing scenic quality in the project area as no regulations related to scenic quality apply to the proposed R&M Program.

Project activities would be visible from surrounding land uses and would temporarily alter the existing visual character and quality of the project area and vicinity, due to the presence of equipment and material, stockpiles of soil, and construction vehicles during R&M Program activities. Construction equipment and materials would be removed from all sites upon completion of R&M

Program activities. Due to the temporary nature of R&M Program activities and the removal of visible project components following completion of construction, construction and operation of the proposed R&M Program would not substantially degrade the existing visual character or quality of the project site and its surroundings. This impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

d. Would the project create a new source of substantial light or glare which would adversely affect daytime or nighttime views in the area?

Implementation of the R&M Program would involve the continuation of routine operation and maintenance of the Facility, as described in detail in the Project Description. Some of these activities may involve upgrading lighting fixtures; however, such improvements would be similar to existing infrastructure during operation, and additional lighting beyond what is currently provided for existing facilities is not proposed.

Proposed project components may create light and glare during construction due to the presence of construction vehicles and equipment. Construction would occur primarily during the daytime hours, though late afternoon activities during the winter could require the use of temporary lighting. If temporary lighting is required, depending upon the activity, light may be visible from surrounding roadways and residential and other land uses; however, the lighting would not face toward adjacent uses and would be directed towards the applicable maintenance and repair activities. Any construction lighting used would be shielded to minimize impacts to nearby receptors, including residents to the east. As such, light and glare from occasional nighttime construction activities would not substantially disturb sensitive receptors, and potential impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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2 Agriculture and Forestry Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	■
b. Conflict with existing zoning for agricultural use or a Williamson Act contract?	☐	☐	☐	■
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)); timberland (as defined by Public Resources Code Section 4526); or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	☐	☐	☐	■
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	■
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	■

a. Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

b. Would the project conflict with existing zoning for agricultural use or a Williamson Act contract?

c. Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)); timberland (as defined by Public Resources Code Section 4526); or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

d. Would the project result in the loss of forest land or conversion of forest land to non-forest use?

e. Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?

The project site is zoned OS, "Open Space." As shown on the California Department of Conservation (DOC) Ventura County Important Farmland 2016 map, the project site is not located in an area designated as Prime Farmland, Farmland of Statewide or Local Importance, or Unique Farmland (DOC 2017). The project site is not currently in agricultural production and is not located on land covered by a Williamson Act contract. The proposed R&M Program also would not cause the loss of forest land or conversion of forest land to non-forest use.

The project would not convert farmland to non-agricultural use, conflict with agricultural zoning or a Williamson Act contract, conflict with forest land or timberland zoning, or result in the loss of forest land. As such, no impact to agriculture or forestry resources would occur.

NO IMPACT

3 Air Quality

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	■
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	■	☐	☐
c. Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	■	☐
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	■	☐

The project area is in the South Central Coast Air Basin (Basin) which covers San Luis Obispo, Santa Barbara, and Ventura Counties. The Ventura County Air Pollution Control District (VCAPCD) monitors and regulates the local air quality in Ventura County and administers the Air Quality Management Plan (AQMP). The analysis presented in this section is based on information found in the Ventura County Air Quality Assessment Guidelines (Guidelines), adopted by the VCAPCD in 2003.

Air quality is affected by stationary sources (e.g., industrial uses and oil and gas operations) and mobile sources (e.g., motor vehicles). Air quality at a given location is a function of several factors, including the quantity and type of pollutants emitted locally and regionally, and the dispersion rates of pollutants in the region. Primary factors affecting pollutant dispersion are wind speed and direction, atmospheric stability, temperature, the presence or absence of inversions, and topography. The project site is in the southeastern portion of the Basin, which has moderate variability in temperatures, tempered by coastal processes. The air quality within the Basin is influenced by a wide range of emission sources, such as dense population centers, heavy vehicular traffic, industry, and weather.

Air Quality Standards and Attainment

The VCAPCD is required to monitor air pollutant levels to ensure National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) are met. If the standards are met, the Basin is classified as being in "attainment." If the standards are not met, the Basin is classified as being in "non-attainment" and the VCAPCD is required to develop strategies to meet the standards. According to the California Air Resources Board (CARB) Area Designation Maps, the project site is located in a region identified as being in non-attainment for the ozone NAAQS and CAAQS and non-attainment for the particulate matter less than 10 microns in diameter (PM_{10})

CAAQS (CARB 2015). In February 2017, the VCAPCD adopted the 2016 Ventura County AQMP, which provides a strategy for the attainment of federal ozone standards (VCAPCD 2017).

San Joaquin Valley Fever (formally known as Coccidioidomycosis, hereafter referred to as Valley Fever) is an infectious disease caused by the fungus Coccidioides immitis. Valley Fever is a disease of concern in the Basin. Infection is caused by inhalation of Coccidioides immitis airborne spores, formed when dry, dusty soil or dirt is disturbed by natural processes, such as wind or earthquakes, or by human-induced ground-disturbing activities, such as construction, farming, or other activities (VCAPCD 2003). From 2011 to 2015, the number of cases of Valley Fever reported in California averaged 3,611 per year, with an average of 50 cases per year reported in Ventura County (California Department of Public Health 2016).

Air Emission Thresholds

The VCAPCD Guidelines recommend specific air emission thresholds for determining whether a project may have a significant adverse impact on air quality within the Basin. These air emission thresholds differ between the Ojai Planning Area, which is defined as the Ojai Valley and includes the project area, and the remainder of Ventura County. Because the proposed R&M Program is in the Ojai Planning Area, it would have a significant impact if its mobile source emissions exceed five pounds per day of Reactive Organic Compounds (ROC; also referred to as Reactive Organic Gases) or five pounds per day of Nitrogen Oxides (NO_X). The five pounds per day threshold for ROC and NO_X is not intended to be applied to construction emissions since such emissions are temporary. Nevertheless, VCAPCD Guidelines state construction-related emissions should be mitigated if estimates of ROC or NOx emissions from heavy-duty construction equipment exceed this threshold.

The VCAPCD has not established quantitative thresholds for particulate matter for either operation or construction. The VCAPCD indicates a project generating fugitive dust emissions in such quantities as to cause injury, detriment, nuisance, or annoyance to any considerable number of persons, or which may endanger the comfort, repose, health, or safety of any such person, or which may cause or have a natural tendency to cause injury or damage to business or property, would have a significant air quality impact. This threshold is applicable to the generation of fugitive dust during grading and excavation activities. The VCAPCD Guidelines recommend fugitive dust mitigation measures be applied to all dust-generating activities. Such measures include minimizing the project disturbance area, watering the site prior to commencement of ground-disturbing activities, covering all truck loads, and limiting on-site vehicle speeds to 15 miles per hour or less.

Applicable VCAPCD Rules and Regulations

The VCAPCD implements rules and regulations for emissions generated by various uses and activities. The rules and regulations detail pollution-reduction measures to be implemented during construction and operation of projects. Relevant rules and regulations to the project include those listed below.

Rule 50 (Opacity)

This rule sets opacity standards on the discharge from sources of air contaminants. This rule would apply during construction of the proposed R&M Program.

Rule 51 (Nuisance)

This rule prohibits any person from discharging air contaminants or any other material from a source which would cause injury, detriment, nuisance, or annoyance to any considerable number of persons or the public or which endangers the comfort, health, safety, or repose to any considerable number of persons or the public. The rule would apply during construction and operational activities.

Rule 55 (Fugitive Dust)

This rule requires fugitive dust generators, including construction and demolition projects, to implement control measures limiting the amount of dust from vehicle track-out, earth moving, bulk material handling, and truck hauling activities. The rule would apply during construction and operational activities.

Rule 55.1 (Paved Roads and Public Unpaved Roads)

This rule requires fugitive dust generators to begin the removal of visible roadway accumulation within 72 hours of any written notification from the VCAPCD. The use of blowers is expressly prohibited under any circumstances. This rule also requires controls to limit the amount of dust from any construction activity or any earthmoving activity on a public unpaved road. This rule would apply throughout all construction activities.

Rule 55.2 (Street Sweeping Equipment)

This rule requires the use of PM_{10} efficient street sweepers for routine street sweeping and for removing vehicle track-out pursuant to Rule 55. This rule would apply during all construction activities.

Rule 74.4 (Cutback Asphalt)

This rule sets limits on the type of application and volatile organic compound (VOC) content of cutback and emulsified asphalt. The proposed R&M Program is required to comply with the type of application and VOC content standards set forth in this rule.

a. Would the project conflict with or obstruct implementation of the applicable air quality plan?

According to the VCAPCD Guidelines, a project may be inconsistent with the applicable air quality plan if it would cause the existing population to exceed forecasts contained in the most recently adopted AQMP. The VCAPCD adopted the 2016 Ventura County AQMP to demonstrate a strategy for and reasonable progress toward attainment of the federal 8-hour ozone standard. The 2016 Ventura County AQMP relies on the Southern California Association of Governments' 2016 Regional Transportation Plan/Sustainable Communities Strategy forecasts of regional population growth in its projections for managing Ventura County's air quality.

The primary objective of the R&M Program is to maintain the proper operation of the Facility and to protect life and property. The proposed maintenance and repair activities would preserve the conveyance capacity of the Facility by preventing the accumulation of obstructing vegetation and sediments that could impede fish passage and water diversion operations. The program would not expand the conveyance capacity beyond the original design. Consequently, it would not contribute

directly or indirectly to population growth and would not cause exceedances of the growth forecasts employed in the 2016 Ventura County AQMP. No impact would occur.

NO IMPACT

b. Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or State ambient air quality standard?

The proposed R&M Program would generate long-term emissions associated with R&M activities. Emissions for each activity were modeled as individual, consecutive, non-overlapping phases using the California Emissions Estimator Model (CalEEMod) version 2016.3.2.[3] Emissions were then added together for activities that may occur simultaneously to estimate a "reasonable worst-case-scenario" because VCACPD thresholds are based on maximum daily emissions. Although the R&M activities would occur regularly throughout the operation of the Facility, emissions were modeled as "construction" emissions in CalEEMod to account for the use of heavy-duty equipment.

For the purposes of modeling, the analysis relied upon the following assumptions:

- Crews would work five days per week.
- Up to ten workers would travel individually to the site each day throughout the duration of the activities.
- Fugitive dust control measures are required by VCAPCD Rule 55. Such measures include securing tarps over truck loads, removing vehicle track-out using PM_{10}-efficient sweepers, and watering bulk material to minimize fugitive dust. These measures were added as "mitigation" in CalEEMod but are included in the unmitigated outputs in this analysis. It was assumed the sweeping of paved roads would achieve a PM_{10} reduction of 25 percent (South Coast Air Quality Management District [SCAQMD] 1993).
- The "reasonable worst-case-scenario" assumes simultaneous implementation of Activity No. 1 and Activity No. 6E (Road Maintenance). Several other activities are expected to overlap; however, simultaneous occurrence of these two reasonably overlapping activities yields the most conservative (highest) emissions of all combinations of activities expected to overlap. Emissions from implementation of individual program activities and other combinations of program activities would be lower than emissions under this scenario. Emissions modeling for all individual scenarios is provided in Appendix G.
- **Activity No. 1 Forebay Sediment**. Under normal conditions, Casitas would place or stockpile 100 percent of the removed forebay sediment on site. However, under certain high-sediment conditions (e.g., post-fire), Casitas may need to export excess sediment off site. Preliminary air emissions modeling indicated this export scenario would yield higher air criteria pollutant emissions than the on-site placement scenario due to the haul trips. Therefore, this air quality analysis conservatively analyzes emissions under the export scenario. Casitas is attempting to identify a receiver in the county to beneficially use sediment removed during Activity 1. However, this analysis conservatively assumes Casitas would dispose of the sediment at the Simi Valley Landfill and Recycling Center, located in the city of Simi Valley approximately 50 miles (driving distance) from the project site.
    - **Haul trips.** It was assumed up to 5,000 cubic yards of soil would be disposed of at the Simi Valley Landfill and Recycling Center. Assuming haul trucks have a capacity of 16 cubic yards,

[3] CalEEMod was developed by the SCAQMD and is used by jurisdictions throughout the State to quantify criteria pollutant emissions.

approximately 626 ~~round-trip~~ one-way truck trips would be required throughout the 60-day duration of Activity No. 1. For the purposes of modeling, these haul trips were split into two phases. One phase accounts for the geographic portion of the haul trips occurring within the boundaries of the Ojai Valley Planning Area, totaling approximately ten miles. The second phase accounts for the geographic portion of the haul trips occurring outside the Ojai Valley Planning Area, totaling 40 miles.

- **Equipment.** Modeled off-road equipment for Activity No. 1 includes a backhoe, a Caterpillar 950 loader, two Caterpillar dozers (D8 and D6), a Caterpillar excavator 320, a Caterpillar 120 grader, a Caterpillar excavator 350, and a Caterpillar articulated dump truck 725. Two work trucks (Ford F350 type) and a water truck were modeled as on-road equipment in vendor trips to the site.

- **Activity No. 2 Fish Ladder, Screenbay, High-flow Bypass**. Assumed an excavator, a loader, and two water pumps would be used up to six days[4].
- **Activity No. 3 Rock Weir and Measurement Weir**. Assumed an excavator would be used up to four days.
- **Activity No. 4 Entrance Pool**. Assumed a bulldozer, an excavator, and an off-highway truck would be used for up to five days.
- **Activity No. 5 Concrete Structures**. Assumed two off-highway trucks, a concrete mixer, an excavator, and a pump.
- **Activity No**. **6 Routine Maintenance**.
  - For Timber Cut-Off Wall, assumed an excavator, a skid steer loader, an off-highway truck, a front-end loader, a backhoe, and a compactor.
  - For Debris Fence, assumed a backhoe.
  - For Radial Gates, assumed an aerial lift.
  - For Instrumentation, assumed no heavy equipment.
  - For Road Maintenance, assumed one dozer.

Criteria Air Pollutant Emissions

Program implementation would generate recurring criteria air pollutant emissions associated with fugitive dust and exhaust emissions from heavy-duty equipment and vehicles. Not all activities would occur simultaneously; therefore, this analysis uses the "reasonable worst-case-scenario" of simultaneous implementation of Activity No. 1 and Activity No. 6E (Road Maintenance) to calculate maximum daily emissions.

Table 5 summarizes maximum daily pollutant emissions during simultaneous implementation of Activity No. 1 and Activity No. 6E.

4 At the time of CalEEMod modeling, it was assumed that two water pumps would be used. Since that time, the Project Description has been revised and no longer includes the use of two water pumps. The CalEEMod modeling was not updated to reflect this change and therefore provides a conservative analysis of air quality emissions outputs with inclusion of the two water pumps.

Table 5 Reasonable Worst-Case Emissions – Unmitigated

	Estimated Maximum Daily Emissions (pounds/day)					
	ROC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Ojai Valley Plan Area						
Activity No. 1 - Forebay Sediment	3.05	31.51	21.34	0.06	2.95	1.97
Activity No. 6E - Road Maintenance	1.12	11.01	4.51	0.01	3.36	2.01
"Worst-Case-Scenario" Maximum Daily Emissions	**4.16**	**42.52**	**25.85**	**0.07**	**6.31**	**3.98**
Ojai Valley Area Plan Significance Thresholds	5	5	N/A	N/A	N/A	N/A
Threshold Exceeded?	**No**	**Yes**	**N/A**	**N/A**	**N/A**	**N/A**
Ventura County						
"Worst-Case-Scenario" Maximum Daily Emissions	4.16	42.52	25.85	0.07	6.31	3.98
Haul Truck Emissions Outside Ojai Valley Plan Area	0.15	4.29	1.23	0.01	0.31	0.10
Total Ventura County Emissions	**4.31**	**46.81**	**27.08**	**0.08**	**6.62**	**4.08**
VCAPCD Significance Thresholds	25	25	N/A	N/A	N/A	N/A
Threshold Exceeded?	**No**	**Yes**	**N/A**	**N/A**	**N/A**	**N/A**

ROC: reactive organic compounds; NO_X: nitrogen oxides; CO: carbon monoxide; SO_X: sulfur oxides; PM_{10}: particulate matter 10 microns or less in diameter; $PM_{2.5}$: particulate matter 2.5 microns or less in diameter; N/A = not applicable (the VCAPCD has not adopted quantitative thresholds for these pollutants)

See Appendix F for modeling details and CalEEMod results.

Notes: Emissions presented are the highest of the winter and summer modeled emissions. Emissions data is sourced from "mitigated" results, which incorporate emissions reductions from regulatory compliance measures and best management practices to be implemented during project implementation, such as watering of soils during construction required under VCAPCD Rule 55 and limiting vehicle speeds to 15 miles per hour (BMP-21). Emissions by activity include both on-site and off-site emissions.

As shown in Table 5, maximum daily emissions generated during the "reasonable worst-case-scenario" would exceed the NO_X emissions thresholds for both the Ojai Valley Planning Area and the overall VCAPCD jurisdictional area. Implementation of Mitigation Measures AQ-1, AQ-2, and AQ-3 would reduce potential impacts related to NO_X emissions to less-than-significant levels.

Fugitive Dust Emissions

The VCAPCD states significant air quality impacts would result if fugitive dust emissions are generated in such quantities as to cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which may endanger the comfort, repose, health, or safety of any such person or the public. For construction impacts, the VCAPCD recommends minimizing fugitive dust through dust control measures.

Implementation of fugitive dust control measures are required by VCAPCD Rule 55. Such measures include securing tarps over truck loads, removing vehicle track-out using PM_{10} efficient sweepers, and watering bulk material to minimize fugitive dust. As a result, compliance with Rule 55 would ensure construction emissions would not be generated in such quantities as to cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or endanger the comfort, repose, health, or safety of any such person or the public.

Valley Fever

The population of Ventura County has been and will continue to be exposed to Valley Fever from agricultural and construction activities occurring throughout the region. The fungal spores responsible for Valley Fever generally grow in virgin, undisturbed soil. Soils at the project site are already disturbed from Facility operations. Due to previous disturbance at the Facility, disturbance of soils during program activities is unlikely to pose a substantial risk of infection. Substantial increases in the number of reported cases of Valley Fever tend to occur only after major ground-disturbing events such as the 1994 Northridge earthquake (VPAPCD 2003). Implementation of the proposed program would not result in a comparable amount of ground disturbance. Furthermore, the standard control measures required by VCAPCD Rule 55 would reduce fugitive dust generation, which would further minimize the risk of spore mobilization and associated infection. Therefore, implementation of the program would not significantly increase the risk to public health above existing background levels. Because the project area does not pose a substantial risk for Valley Fever, impacts would be less than significant.

Mitigation Measures

The following mitigation measures would reduce impacts related to NO_X emissions to a less-than-significant level.

AQ-1 Tier 4 Equipment

All off-road equipment greater than 50 horsepower shall meet U.S. EPA Tier 4 emission standards.

AQ-2 Increased Dump Truck Capacity

On-road dump trucks used to export sediment during Activity No. 1 shall be double-bottom or tandem dump trucks, with a minimum capacity of 21 cubic yards of soil.

AQ-3 Haul Trip Timing

During years in which sediment removal under Activity No. 1 requires off-site export of excess sediment, Activity No. 1 shall not occur simultaneously with any other program activity.

Significance After Mitigation

Incorporation of Mitigation Measure AQ-1 would reduce the emissions associated with operation of off-road equipment. Mitigation Measure AQ-2 would reduce the emissions associated with off-site haul truck trips in Activity No. 1 by decreasing the total number of trips needed to haul the potential sediment exports (up to 5,000 cubic yards) from the project site. Assuming each double-bottom or tandem dump truck would have a capacity of 21 cubic yards of sediment, only 478 total one-way trips would be required. Mitigation Measure AQ-3 would reduce daily emissions during years in

which Activity No. 1 requires off-site export by prohibiting Activity No. 1 from overlapping with other program activities.

Table 6 summarizes maximum daily pollutant emissions in the reasonable worst-case emissions scenario, which would occur during years in which sediment removal under Activity No. 1 would require off-site export of excess sediment. Under this scenario, Mitigation Measures AQ-1 through AQ-3 would be implemented.

Table 6 Reasonable Worst-Case Scenario Emissions During Haul Years – Mitigated

	Estimated Maximum Daily Emissions (pounds/day)					
	ROC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Ojai Valley Plan Area						
Activity No. 1 - Forebay Sediment	0.75	4.66	26.32	0.06	1.77	0.90
Ojai Valley Area Plan Significance Thresholds	5	5	N/A	N/A	N/A	N/A
Threshold Exceeded?	**No**	**No**	**N/A**	**N/A**	**N/A**	**N/A**
Ventura County						
Activity No. 1 Maximum Daily Emissions Inside Ojai Valley Plan Area	0.75	4.66	26.32	0.06	1.77	0.90
Haul Truck Emissions Outside Ojai Valley Plan Area	0.12	3.28	0.96	0.01	0.24	0.08
Total Ventura County Emissions	**0.87**	**7.94**	**27.28**	**0.07**	**2.01**	**0.98**
VCAPCD Significance Thresholds	25	25	N/A	N/A	N/A	N/A
Threshold Exceeded?	**No**	**No**	**N/A**	**N/A**	**N/A**	**N/A**

ROC: reactive organic compounds; NO_X: nitrogen oxides; CO: carbon monoxide; SO_X: sulfur oxides; PM_{10}: particulate matter less than 10 microns in diameter; $PM_{2.5}$: particulate matter less than 2.5 microns in diameter; N/A = not applicable (the VCAPCD has not adopted quantitative thresholds for these pollutants)

See Appendix G for modeling details and CalEEMod results.

Notes: Emissions presented are the highest of the winter and summer modeled emissions. Emissions data is sourced from "mitigated" results, which incorporate emissions reductions from implementation of Mitigation Measures AQ-1 through AQ-3 in addition to County-required measures under VCAPCD Rule 55.

As shown in Table 6, with implementation of Mitigation Measures AQ-1 through AQ-3, the program would not generate emissions in excess of the VCAPCD significance thresholds established for the Ojai Valley Planning Area or the overall VCAPCD jurisdictional area in off-site haul years. This impact would be less than significant with mitigation incorporated.

Table 7 summarizes maximum daily pollutant emissions during years in which sediment removal under Activity No. 1 would not require off-site export of excess sediment. In these years, Mitigation Measure AQ-1 would apply, to require compliance with U.S. EPA Tier 4 emission standards, and Mitigation Measure AQ-2 would apply, to increase dump truck capacity to reduce the number of trips required, but Mitigation Measure AQ-3 would not apply, because no off-site sediment export would be required. Without Mitigation Measure AQ-3, which prevents Activity No. 1 from occurring

simultaneously with any other program activity, it is possible that simultaneous implementation of Activity Nos. 1 and 6E could occur.

Table 7 Reasonable Worst-Case Emissions During Non-Haul Years – Mitigated

	Estimated Maximum Daily Emissions (pounds/day)					
	ROC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Ojai Valley Plan Area						
Activity No. 1 - Forebay Sediment	0.71	3.32	26.01	0.05	1.71	0.89
Activity No. 6E - Road Maintenance	0.18	0.50	4.30	0.01	2.84	1.54
"Worst-Case-Scenario" Maximum Daily Emissions Inside Ojai Valley Plan Area	**0.89**	**3.82**	**30.31**	**0.06**	**4.56**	**2.42**
Ojai Valley Area Plan Significance Thresholds	5	5	N/A	N/A	N/A	N/A
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

ROC: reactive organic compounds; NO_X: nitrogen oxides; CO: carbon monoxide; SO_X: sulfur oxides; PM_{10}: particulate matter less than 10 microns in diameter; $PM_{2.5}$: particulate matter less than 2.5 microns in diameter; N/A = not applicable (The VCAPCD has not adopted quantitative thresholds for these pollutants.)

See Appendix F for modeling details and CalEEMod results.

Notes: Emissions presented are the highest of the winter and summer modeled emissions. Emissions data is sourced from "mitigated" results, which incorporate emissions reductions from implementation of Mitigation Measures AQ-1 through AQ-3 in addition to County-required measures under VCAPCD Rule 55.

As shown in Table 7, with implementation of Mitigation Measure AQ-1, the program would not generate emissions in excess of the VCAPCD significance thresholds established for the Ojai Valley Planning Area in non-haul years. This impact would be less than significant with mitigation incorporated.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

c. Would the project expose sensitive receptors to substantial pollutant concentrations?

The VCAPCD defines sensitive receptors as facilities or land uses that include members of the population particularly sensitive to the effects of air pollutants, such as children, the elderly, and people with illnesses. Examples of sensitive receptors listed in the VCAPCD (2003) Guidelines include schools, hospitals, and daycare centers; sensitive receptors also typically include residences. The nearest sensitive receptors are residences located approximately 100 feet from the sediment placement area.

Traffic-congested roadways and intersections have the potential to generate elevated localized carbon monoxide (CO) levels (i.e., CO hotspots). In general, CO hotspots occur in areas with poor circulation or areas with heavy traffic. Existing CO levels in Ventura County have been historically low enough that VCAPCD monitoring stations throughout the county ceased monitoring ambient CO concentrations in March and July 2004 (VCAPCD 2010). R&M Program activities would cause a minor increase in vehicle traffic to the Facility as a result of worker vehicle trips, delivery of heavy-duty equipment and materials, water truck trips, and haul trips. Because the Facility is not located in an area with poor circulation or heavy traffic, project-related traffic would not cause or contribute

to potential temporary CO hotspots. Therefore, the program would not expose sensitive receptors to substantial concentrations of CO, and impacts would be less than significant.

Toxic air contaminants (TACs) are a diverse group of air pollutants that may cause or contribute to an increase in deaths or serious illness, or that may pose a present or potential hazard to human health. TACs generally consist of four types: organic chemicals, such as benzene, dioxins, toluene, and percholorethylene; inorganic chemicals such as chlorine and arsenic; fibers such as asbestos; and metals such as mercury, cadmium, chromium, and nickel. The primary TAC emitted by program implementation would be diesel particulate matter generated by heavy-duty equipment and diesel-fueled delivery and haul trucks. There would be a limited number of equipment in operation at any given time across the year, as not all activities would occur at the same time or in the same years. In addition, emissions associated with diesel-fueled delivery and haul trucks would be dispersed across truck trip routes and across different portions of the project site. As a result, the project would not generate substantial TAC emissions at sensitive receptors, and potential impacts from exposure of sensitive receptors to substantial TAC concentrations would be less than significant.

LESS THAN SIGNIFICANT IMPACT

d. Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

The program involves R&M activities at an existing water diversion and fish passage facility. Program activities could generate temporary odors associated with diesel exhaust generated by heavy-duty equipment operation. However, these odors would be localized to the area immediately surrounding the on-site activity and restricted to the duration of equipment use. The program does not involve any land uses listed by VCAPCD as facilities and operations that may generate significant odors, such as sanitary landfills, asphalt batch plants, food processing facilities, and feed lots (VCAPCD 2003). Consequently, this impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

4 Biological Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	■	☐
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	■	☐
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	■	☐
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	■	☐
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	■	☐
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	■

In January 2021, Rincon Consultants, Inc. conducted a Biological Resources Assessment (BRA), including a literature review and the results of a field reconnaissance survey to document existing site conditions and the potential presence of special-status biological resources, including plant and wildlife species, plant communities, jurisdictional waters and wetlands, and habitat for nesting birds. The following summarizes the findings of the BRA. The complete BRA including appendices is provided as Appendix A to this IS-MND.

The Biological Study Area (BSA) includes the Facility, upland staging sites and access roads adjacent to the Facility, approximately 1,100 feet of downstream river channel where excavated sediment from the forebay would be placed within the Ventura River, and a 100-foot buffer surrounding the area where routine maintenance and repair activities are proposed. Presently, land uses in and around the BSA are predominantly open space and residential zoning. The project footprint occurs within the Facility within the Ventura River.

The BSA occurs between 724 to 790 feet above mean sea level. The United States Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) Web Soil Survey delineates four soil map units within the BSA including Riverwash (Rw), Orthents-Fluvents complex (38), dry, zero to 15 percent slopes, Cortina stony sandy loam (CrC), two to nine percent slopes, and Ojai stony fine sandy loam (OsD2), two to 15 percent slopes, eroded. Of these, Riverwash is designated as a hydric soil in the Ventura Area (USDA 2020).

Several plant communities and land cover types occur within the BSA. Portions of the Facility are hardscaped with concrete and metal (e.g., radial gates) and surrounded with a chain-link fence. The Facility is surrounded by gravel base and disturbed bare ground. The forebay is predominately unvegetated riverbed, however a narrow strip of riparian vegetation occurs on the eastern bank of the forebay and is comprised of mulefat (*Baccharis salicifolia*) and sandbar willow (*Salix exigua*). East of the forebay is a disturbed area created during Facility construction (it includes the proposed staging site) and containing a gravel base and scattered non-native species including Russian thistle (*Salsola* sp.) and tocalote (*Centaurea melitensis*). The habitat in uplands west of the forebay and on the eastern bank of the river downstream of the timber cut-off wall, is predominantly laurel sumac (*Malosma laurina*) scrub, a native California vegetation community. Red brome grassland is co-dominant in disturbed upland portions of the BSA immediately downstream of the timber cut-off wall. Downstream of the spillway, a riparian strip comprised of mulefat scrub, individual coast live oak trees and sycamore trees occurs along both sides of the spillway channel (low flow channel). Farther downstream, approximately 300 feet below the confluence of the low flow channel with the mainstem of the Ventura River, a narrow strip of mulefat scrub is present on both sides of the channel. Residential properties and agricultural lands extend eastward from the east bank of the Ventura River floodplain. The Ventura River floodplain broadens downstream of Facility, to the west.

The BSA provides suitable habitat for wildlife species that commonly occur in semi-rural, residential areas. The proposed project site is surrounded by a chain-link fence, and suitable habitat for wildlife does not occur within the concrete-lined portions of the Facility or within the immediate surrounding area. Suitable habitat for wildlife does occur within the Ventura River above and below the Facility. The wildlife species detected on site during field surveys are common, widely distributed, and adapted to living in proximity to human development. Common avian species detected on or adjacent to the site include great egret (*Ardea alba*), Anna's hummingbird (*Calypte anna*), black phoebe (*Sayornis nigricans*), California scrub-jay (*Aphelocoma californica*), American coot (*Fulica americana*), great blue heron (*Ardea herodias*), killdeer (*Charadrius vociferus*), Anna's hummingbird (*Calypte anna*), acorn woodpecker (*Melanerpes formicivorus*), California towhee

(*Melozone crissalis*), great-horned owl (*Bubo virginianus*), and barn owl (*Tyto alba*). Inactive mud nests, likely from a species of swallow, were observed on the underside of the Robles Diversion Dam structure during the pre-construction Forebay Restoration Project survey conducted on November 1, 2019.

Other wildlife species observed include Baja California chorus frogs (*Pseudacris hypochondriaca hypochondriaca*), California chorus frogs (*Pseudacris cadaverina*), arroyo chub (*Gila orcutti*), green sunfish (*Lepomis cyanellus*), American bullfrogs (*Lithobates catesbeianus*), western toads (*Anaxyrus boreas*), red-swamp crayfish (*Procambarus clarkii*), western fence lizard (*Sceloporus occidentalis*), western brush rabbit (*Sylvilagus bachmani*), California ground squirrel (*Otospermophius beecheyi*), deer mouse (*Peromyscus maniculatus*), California pocket mouse (*Chaetodipus californicus*), and mule deer (*Odocoileus hemionus*). Five southwestern pond turtles (*Actinemys pallida*) were also observed approximately 500 feet upstream of the forebay during pre-construction surveys conducted in November 2019.

The California Native Diversity Database (CNDDB) lists a total of thirteen special status plant species within five miles of the BSA. Special status plant species have specialized habitat requirements, including plant community types, soils, and other components. The natural disturbance to the project site caused by continuous scouring during high flow rain events, coupled with the inundation of the forebay with sediment, generally result in low potential for special status species to occur within the project site. Although elements of suitable habitat occur in the riparian habitat surrounding the forebay and the spillway channel for several special status species, no special status plants are expected to occur within the proposed R&M Program site given the current site conditions and level of disturbance. During the field surveys, no special status, federal or state listed species were observed or otherwise detected within the BSA.

Fourteen special status wildlife species are listed in the CNDDB and tracked within the project region. Two special status species are known to occur within the BSA: southwestern pond turtle (SWPT, federally proposed threatened, state species of special concern [SSC]); and arroyo chub (SSC). Seven special status wildlife species have a moderate potential to occur in the BSA. Of these, three are federal and/or state-listed species (California red-legged frog: federally threatened, SSC; least Bell's vireo [*Vireo bellii pusillus*]: federally endangered, state endangered; and SC steelhead: federally endangered, state candidate endangered). Two special status wildlife species have a low potential to occur in the BSA; one of which is a federal and state endangered species: Southwestern willow flycatcher (*Empidonax trailii extimus*).

The CNDDB lists one sensitive natural community in the nine quadrangles that surround the BSA. This community, Southern California Steelhead Stream, is present in the BSA. Portions of Ventura River flows are routed through the concrete-lined screenbay and fish ladder within the Facility. The fish ladder does not function for steelhead passage until about 5-10 cfs flow occurs and it was designed only to operate at above 10 cfs. Therefore, during the project, no functional change in fish passage conditions are anticipated to occur, since the maintenance and repair activities will typically occur when conditions would not be suitable for steelhead passage through the Facility.

Portions of BSA are located on the Ventura River. The Ventura River is a relatively permanent water (RPW) because it contains flows for at least three months out of most years and connects to the Pacific Ocean, a traditional navigable water (TNW). Therefore, the Ventura River is subject to the jurisdiction of the USACE and the Los Angeles RWQCB. The Ventura River is also subject to CDFW jurisdiction pursuant to Section 1600 *et seq.* of the Fish and Game Code. The Ventura River also functions as habitat corridor facilitating wildlife movement. Regionally, the northern portion of the BSA occurs within an Essential Connectivity Area (ECA) as mapped in the report, *California Essential*

Habitat Connectivity Project: A Strategy for Conserving a Connected California (CDFW 2010). The ECA lies north of the city of Ojai. The ECA surrounds the entire northern section of the city of Ojai and is approximately ten miles across to the north of the city. Hardscaped portions of the Facility, outside of the river channel are surrounded by a chain-link fence, which does not currently limit wildlife movement between wildlife habitat within the Ventura River. The portion of the Ventura River which traverses the BSA is compatible with wildlife movement up and down the river. In addition, the Facility includes a fish ladder to allow movement of aquatic species. There is approximately 10 miles of ECA around the Facility for wildlife movement. The proposed R&M Program would result in a temporary limitation on wildlife movement within the Ventura River immediately upstream and downstream of the Facility as a result of human presence. However, wildlife could still move through the area when activities aren't occurring, such as outside of work hours or on non-workdays (e.g., weekends).

Tree Protection Ordinances

The Ventura County Tree Protection Ordinance (Ventura County Code Section 8107-25) requires a permit be obtained for the removal, alteration, or encroachment into the tree protection zone (TPZ) of a protected tree. Protected trees are defined as oaks (*Quercus*) and sycamores (*Platanus*) over 9.5 inches in circumference (3-inch diameter at breast height [dbh]) (or 6.25 inches circumference [2-inch dbh] for multi-stemmed oaks). In the unincorporated non-coastal zone, this ordinance protects most native tree species over 9.5 inches in circumference (3-inch dbh). Heritage Trees (any species of tree with a single trunk of 90 or more inches in girth [28.6-inch dbh] or with multiple trunks, two of which collectively measure 72 inches in girth [23-inch dbh] or more) and Historical Trees (any tree or group of trees identified by the county or a city as a landmark, or identified on the federal or California Historic Resources Inventory to be of historical or cultural significance, or identified as contributing to a site or structure of historical or cultural significance) are also protected.

Ministerial tree permits are generally allowed if the tree interferes with public utility facilities, as certified by a qualified tree consultant. However, a discretionary permit is required for impacts to heritage or historical trees, impacts to more than six protected trees or more than four protected oaks or sycamores, and must include an arborist report by an International Society of Arboriculture (ISA) certified arborist. Mitigation is also generally required for impacts to protected trees. Mitigation can involve a range of options, including on-site or off-site tree replacement, off-site land acquisition for the purpose of tree protection, or in-lieu fee paid directly to the County. The cost of mitigation can vary, depending on the degree of tree impacts required mitigation. The eastern edge of the disturbed area proposed to be used as a staging area borders a stand of coast live oak trees along the west bank of the Ventura River. In addition, oak trees are scattered throughout the Ventura River downstream of the timber cut-off wall adjacent to the primary placement area. The oak trees are likely protected under the County Municipal Code. It is not anticipated that oak trees would be removed, pruned or encroached upon.

Ventura County General Plan

The Ventura County General Plan (VCGP) is the primary planning document for the County. It represents the community's collective vision for preserving and improving the quality of life in Ventura County. The following provides applicable policies for the protection of biological resources.

- **Locally Important Species.** The VCGP identifies locally important species as significant biological resources to be protected from incompatible land uses and development. The VCGP defines a

Locally Important Species as a plant or animal species that is not an endangered, threatened, or rare species, but is considered by qualified biologists to be a quality example or unique species within the County and region. Locally important species are not expected to be present in the project areas.

- **Wildlife Migration.** The VCGP specifically includes wildlife migration corridors as an element of the region's significant biological resources. In addition, protecting habitat connectivity is critical to the success of special status species and other biological resource protections. Potential project impacts to wildlife migration are analyzed by biologists on a case-by-case basis. The issue involves both a macro-scale analysis—where routes used by large carnivores connecting very large core habitat areas may be impacted—as well as a micro-scale analysis—where a road or stream crossing may impact localized movement by many different animals. The project located within the Sierra Madre – Castaic ECA boundary. The Ventura River provides a means to facilitate regional connectivity for several species including, but not limited to the SC steelhead ~~– Southern California DPS~~, California red-legged frog and southwestern pond turtle.
- **Wetland Habitats.** The VCGP contains policies which strongly conditions discretionary development to protect wetland habitats. The Ventura River is located within the BSA; however, the project involves maintenance of an existing Facility; therefore, the policies for discretionary development would not apply.

The project parcel does not occur within any Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP), or other approved local, regional, or state habitat conservation plan areas. The proposed R&M Program would not conflict with the provisions of any such plans.

a. Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Special-status species are those plants and animals 1) listed, proposed for listing, or candidates for listing as Threatened or Endangered by the USFWS and NMFS under the federal Endangered Species Act; 2) listed or candidates for listing as Rare, Threatened, or Endangered by the CDFW under the California Endangered Species Act or Native Plant Protection Act; 3) recognized as Fully Protected species or Species of Special Concern by the California Fish and Game Code (CFGC) or CDFW; and 5) occurring on Lists 1 and 2 of the CDFW California Rare Plant Rank system per the following definitions:

- List 1A = Plants presumed extinct in California
- List 1B.1 = Rare or endangered in California and elsewhere; seriously endangered in California (over 80 percent of occurrences threatened/high degree and immediacy of threat)
- List 1B.2 = Rare or endangered in California and elsewhere; fairly endangered in California (20 to 80 percent occurrences threatened)
- List 1B.3 = Rare or endangered in California and elsewhere, not very endangered in California (<20 percent of occurrences threatened, or no current threats known)
- List 2 = Rare, threatened or endangered in California, but more common elsewhere

In addition, special-status species are ranked globally (G) and subnationally (S) 1 through 5 based on NatureServe's (2010) methodologies:

- G1 or S1 – Critically Imperiled Globally or Subnationally (state)
- G2 or S2 – Imperiled Globally or Subnationally (state)
- G3 or S3 – Vulnerable to extirpation or extinction Globally or Subnationally (state)
- G4 or S4 – Apparently secure Globally or Subnationally (state)
- G5 or S5 – Secure Globally or Subnationally (state)
- ? – Inexact Numeric Rank
- T – Infraspecific Taxon (subspecies, varieties, and other designations below the level of species)
- Q – Questionable taxonomy that may reduce conservation priority

Common bird species that receive protection under the Migratory Bird Treaty Act (MBTA) and/or CFGC 3503 but otherwise maintain no sensitivity designation are not treated as special-status species for purposes of this analysis.

Rincon biologists determined the majority of the BSA does contain suitable habitat for several special-status plant species based on a pedestrian survey and various records searches (refer to Appendix A). However, no special status plant species have potential to occur within the project site. Special status plant species have specialized habitat requirements, including plant community types, soils, and other components. The project site generally lacks these elements. In addition, none of the species analyzed were documented in the BSA during previous surveys conducted by Rincon Consultants, Inc. Based on the lack of suitable habitat and results of botanical surveys, no special status plants are expected to occur within the project site.

Two special status wildlife species (arroyo chub and southwestern pond turtle) were observed within the BSA in November 2019 during field surveys and biological monitoring performed to support the Forebay Restoration Project. Six special status wildlife species were determined to have a moderate potential, and two special status wildlife species were determined to have a low potential to occur in the project site based upon known ranges, habitat preferences for the species, species occurrence records from the CNDDB, and existing conditions.

Steelhead – Southern California Distinct Population Segment (DPS)

Flowing water is not anticipated to be present within the Facility when Casitas initiates maintenance and repair activities annually, given that the activities will occur during the dry season of a historically intermittent or ephemeral reach of the Ventura River (Walter 2015). If flowing water is present (i.e., Activity 2), and Casitas determines maintenance and repair is critical, the portion of the facilities requiring repair or maintenance will be temporarily shut down. The necessary repairs or maintenance on the Facility will be conducted as soon as possible and the structure(s) will be put back in service once it is fixed. After the gates are closed, flow is redirected through the spillway and the remaining water within the fish ladder, screenbay, and high-flow bypass is allowed to gravity flow out of the Facility via the canal or fish ladder. A bank survey for federally listed species (e.g., SC steelhead and CRLF) is conducted as the water recedes. If no listed species are observed in the Facility work will proceed. ~~It is possible for water to pool within the lower portion of the fish ladder (i.e., entrance box). If this portion of the fishway needed critical repair, block nets will be used to encourage fish and frogs to leave the Facility via the fish ladder, and prevent individuals from re-entering the Facility during repairs. Any remaining water would be lowered only enough to conduct repairs by pumping water out of the fish ladder via two doubly screened pumps (5-10 horsepower)~~

~~with 3 millimeter (mm) mesh to prevent impingement. This 'residual water' pump system would be operational for up to 2 days depending on extent of repairs. The water would be directed to the canal which flows to Lake Casitas. The necessary repairs or maintenance on the Facility will be conducted as soon as possible and the structure(s) will be put back in service once it is fixed. Visual monitoring for listed species would be performed periodically while repair and maintenance activities are performed.~~

If no flowing water is present, maintenance and repair activities would not affect southern California steelhead. The effects from spreading the spoil over the previously disturbed areas where spoil has been spread in the past (Activity 1), and along the channel banks downstream of the timber wall cut-off, would also have a negligible effect on steelhead given the current post-Thomas Fire site conditions in the watershed and the amount of sediment moving through the system naturally during storm events. Given the proposed timing of activities outlined in the R&M Program, existing river conditions, and with the implementation of BMP-1, BMP-2, BMP-4, and BMP-9, the effects from the project would be is discountable and less than significant to SC steelhead (please see the BRA Report in Appendix A for further discussion).

California Red-legged Frog (Rana draytonii)

Potential adverse effects to CRLF during project activities include direct mortality or injury as a result of vehicle traffic and equipment operation on access roads, at access points along the banks of the Ventura River, and in the river channel. In addition, CRLF may be injured or killed as a result of being trampled by workers, and from activities such as excavation of sediment and debris, placement of sediment and debris, material stockpiling, and vegetation removal. Vehicle and equipment operation, worker foot traffic, material stockpiling and vegetation removal in the BSA could result in directly crushing adults, larvae, or eggs if present while activities are conducted. Adult CRLF shelter in slow moving and ponded water but will leave the water and disperse or forage across upland area generally between May 1 and July 1. During these dispersal and foraging events adults may be subject to direct mortality or injury. Adults and juveniles could become trapped and die in upland sheltering habitat or be exposed to predators if burrows or other refugia are crushed or covered. The potential for adverse effects to individuals is low because project activities are expected to occur during the dry season, and when flowing or ponded water is not present at the Facility (BMP-1). Further, maintenance and repair activities will occur outside the period of dispersal (May through July) and breeding season (late November through April) for CRLF, as feasible. If project activities must occur during the dispersal period or breeding season, modified protocol surveys will be conducted prior to the initiation of work (BMP-5). If CRLF individuals are not identified in the project work areas, a biological monitor will be present during initial ground disturbing and or vegetation removal activities, and during pre- and post-rain events (BMP-9). The biological monitor will have the authority to halt any actions with the potential to result in impacts to the species.

Project activities may result in mortality, injury, or harm from changes in behavior and physiological stress to CRLF. Direct mortality, injury, or harm may occur if they become entangled or trapped in project-related materials (e.g., fencing, netting, wires, buckets, pallets) or open excavations in the BSA. The project includes implementation of multiple BMPs that would limit these potential impacts, including through conducting pre-construction surveys (BMP-5), conducting activities in the dry season (BMP-1), covering steep-walled excavations at night (BMP-7), and relocating individuals prior to construction (BMP-3).

Project activities that generate noise and vibrations, such as the use of heavy equipment during sediment excavation, could lead to behavioral changes such as flushing from shelter, decreased foraging, decreased dispersal, and hypervigilance. Encroachment by personnel into areas occupied by CRLF during project activities could result in disruption to behavior and cause physiological stress from similar effects. Pre-construction surveys (BMP-5), conducting activities in the dry season (BMP-1), and relocation of individuals prior to construction (BMP-3) would limit these impacts.

The introduction of trash and chemical contaminants during project activities could result in mortality or harm from behavior changes and physiological stress if items are ingested during foraging or if toxins are absorbed through the skin. Trash littered around a project site may attract predators, such as cats, raccoons, ravens, and gulls, to the project site and may expose CRLF to increased predation pressure. All trash and chemical contaminants would be controlled during project activities (BMP-18), therefore adverse effects to CRLF would be unlikely.

Uninformed workers could disturb, injure, or kill California red-legged frogs. The potential for this to occur would be reduced by educating workers on the presence and protected status of these species and the measures that are being implemented to protect them during project Activities (BMP-2). The use of flagging to demarcate work areas would further reduce these potential impacts by preventing workers from encroaching into environmentally sensitive habitat.

Contaminants, such as herbicides, pesticides, soil binders, and fertilizers may kill individuals, affect development of larvae, or affect their food supplies or habitat. Siltation in breeding pools could asphyxiate eggs and newly hatched larvae. Decreased water quality could result in mortality or decreases in reproduction success for this species. Trimming vegetation by hand along the timber cut-off wall would help to minimize these effects (BMP-24).

Stockpiles of removed sediment stored on site can attract CRLF seeking upland refugia, and lead to injury or death if individuals become entrapped or are present when these materials are moved. Inspecting stockpiled materials by a qualified biologist for CRLF prior to disturbance would reduce these effects (BMP-9).

The CRLF could be subject to mortality or harm from the introduction of invasive species or pathogens inadvertently transferred to the BSA by personnel, vehicles, and equipment. Project activities could result in the introduction or spread of non-native invasive plant species, such as arundo (*Arundo donax*) and tamarisk (*Tamarix* sp.), into potentially suitable CRLF habitat on vehicles, equipment, or the clothing and boots of personnel. Non-native invasive plant species often out-compete and exclude native species, potentially altering the structure of the vegetation community and degrading or eliminating habitat utilized by CRLF. To reduce this effect, any noxious vegetation identified by the biological monitor shall be removed from the work area and soil disposal areas. Noxious vegetation shall be disposed of in a manner and at a location that will prevent its re-establishment. Whenever possible, noxious species will be removed by hand or by hand-operated power tools, rather than by chemical means (BMP-24).

Personnel, vehicles, and equipment may also inadvertently be the mechanism by which pathogens, such as chytrid fungus (*Batrachochytrium dendrobatidis*), are transferred from off site to the BSA resulting in a novel introduction of the disease (Bossard et al. 2000). To avoid transferring disease or pathogens between aquatic habitats during California red-legged frog surveys, capture, and relocation efforts, approved biologist(s) must follow the Declining Amphibian Population Task Force's Code of Practice, in accordance with the USFWS BO (2019).

Project activities could alter water quality (chemistry) through accidental spills of pollutants like petro-chemical fluids from vehicles and equipment or chemical-laden runoff (e.g., herbicides,

pesticides), resulting in mortality or injury to CRLF and the introduction of contaminants into the Ventura River. Such impacts may cause increased nitrogen levels leading to mortality and developmental abnormalities in CRLF and impact prey populations (Rouse et al. 1999). Sedimentation can lead to smothering of eggs and tadpoles (Rabeni and Smale 1995), filling of habitat, restriction of water flow, and the reduction of oxygen levels. These effects vary depending on the amount of sediment introduced into the stream, the amount of stream flow, gradient, and other instream factors. The potential for this effect to occur would be reduced by informing workers of the importance of preventing hazardous materials from entering the environment, locating staging and fueling areas away from aquatic habitat, and by having an effective spill response plan and materials in place on the work site.

Pursuant to the USFWS BiOp (2019), capture and relocation of CRLF could result in injury or death as a result of improper handling, containment, transport, or release into unsuitable habitat. Although survivorship for translocated CRLF has not been estimated, survivorship of translocated wildlife in general is reduced due to intraspecific competition, lack of familiarity with the location of potential breeding, feeding, and sheltering habitats, and increased risk of predation. Using qualified biologists, limiting the duration of handling, requiring proper transport of individuals, and identification of suitable relocation sites close to the area of capture should reduce these impacts. The relocation of individuals from the project site is expected to greatly reduce the overall level of injury and mortality, if any, which would otherwise occur if individuals were not removed (USFWS 2019).

No long-term effects to the overall population, reproductive capacity, or recovery of CRLF are anticipated from the proposed R&M Program. Activities under the proposed R&M Program could adversely affect CRLF of any life stage given the known occurrence of the species, marginally suitable habitat within the project site, and potential overlap of proposed R&M Program activities with the species' dispersal period (May 1 and July 1). The proposed R&M Program would cause temporary disturbance and/or loss of aquatic, upland, and dispersal habitat, and could result in mortality of some CRLF larvae, juveniles or adults, with a lower probability of effects to egg masses. However, based on the limited spatial and temporal extent of proposed R&M Program impacts, proposed work window (dry season), and the fact that CRLF were never observed at the Facility, few, if any, CRLF are likely to be killed or injured. With the implementation of BMPs identified in the Project Description, including BMP-1, BMP-2, BMP-5, BMP-7, BMP-9, BMP-23, and BMP-24, the adverse effects from the proposal Annual Repair and Maintenance Program to CRLF would less than significant.

Least Bell's Vireo (Vireo bellii pusillus) and Southwestern Willow Flycatcher (Empidonax trailii extimus)

Project activities are not expected to result in direct mortality or injury to adult least Bell's vireo and southwestern willow flycatcher given the limited foraging opportunities and lack of nesting opportunities within the BSA ~~Action Area~~. If least Bell's vireo and/or southwestern willow flycatcher do occur in the BSA ~~Action Area~~ while project activities are occurring, both species would be expected to be present in such low abundance that any chance encounter with adult individuals resulting in mortality or injury is unlikely.

Least Bell's vireo and southwestern willow flycatcher have not been documented within the BSA. Casitas conducted protocol surveys within the BSA for least Bell's vireo and southwestern willow flycatcher in the 2020 nesting season, the findings of which were negative (Rincon 2020).

Least Bell's vireo is known to occur in similar habitats downstream of the BSA, based on a query of the CNDDB (CDFW 2020). The vegetation community in the BSA may not provide adequate dense, stratified canopy and cover least Bell's vireo prefer as nest sites due to the sparse distribution of mulefat plants between boulders in the Ventura River bottom. The BSA provides moderately suitable habitat for least Bell's vireo due to the presence of early successional mulefat scrub. Harm may occur if least Bell's vireo is present during removal of emergent vegetation where individuals might be sheltering. In addition, removal of a relatively young stand of willows located within the lower limit of the entrance pool amounts to a loss of 1,500 square feet of low suitable habitat for the species. Vegetation at the entrance pool wanes during extended drought, and during high flows, it is scoured away. At present the entrance pool is filled with sediment. Typically, sediment does not accumulate in the entrance pool to the extent that it has. The sediment in the pool became trapped during intense storm events following the 2017 Thomas Fire. Under normal conditions, the pool was designed to be 8 to 10 feet deep without vegetation. The Ventura River is a dynamic system subject to a regular disturbance regime. Instream habitat features are significantly altered by winter flows, which are flashy in nature. Overall, adverse effects to in-channel habitat complexity from the program activities would be temporary and remain negligible or insignificant, especially considering the dynamic nature of the Ventura River channel. Given that the species has not been known to nest at the Facility, the removal of the early successional habitat within the entrance pool would not adversely affect least Bell's vireo. Conducting activities outside of the breeding season (February 1 – August 31); or conducting pre-activity surveys (BMP-6) if work occurs within the breeding season would reduce these impacts to less than significant.

Southwestern willow flycatcher nesting has not been documented in the Ventura River below Matilija Dam, and suitable nesting habitat is absent from the BSA due to the lack of structural diversity and vertical complexity preferred by the species. Although the habitat within the BSA may not provide suitable breeding habitat for southwestern willow flycatcher, the mulefat scrub and California sycamore woodland habitats may support southwestern willow flycatcher during brief periods during migration, although the potential is low. With the implementation of BMP-1, BMP-2, BMP-6, BMP-9, BMP-23, and BMP-24, which are identified in the Project Description and would be implemented as part of the project, the effects from the proposed R&M Program would be discountable and less than significant on least Bell's vireo and southwestern willow flycatcher.

Special Status Terrestrial Species

San Bernardino ringneck snake (*Diadophis punctatus modestus*, state special animal, coast patch-nosed snake (*Salvadora hexalepis virgultea*, SSC), and coast horned lizard (*Phrynosoma blainvillii*, SSC), have a moderate potential to occur within the project areas (e.g., forebay, downstream sediment placement area, and low-flow channel) given the presence of suitable habitat within the BSA. San Bernardino ringneck snake has potential to be present in open, relatively rocky areas in intermittent streams. Coast horned lizard is most common in lowlands along sandy washes with scattered low bushes and pen areas for sunning. Coast patched-nosed snake prefers brushy or shrubby vegetation with small mammal burrows nearby for refuge. Two-striped garter snake, southwestern pond turtle, and arroyo chub have low to moderate potential to occur within the project areas (e.g., forebay, downstream sediment placement area, and low-flow channel) given their highly aquatic nature and habitat requirements. The proposed R&M Program would commence during the dry season when flowing water is not anticipated within the project site. Since these species are highly aquatic, they would not be expected to be present in the project site unless there was adequate water flow. However, if maintenance and repair activities are initiated following an above average rainfall season, ponded water could be present in backwatered areas of

the Ventura River upstream of the forebay, which could potentially support two-striped garter snake and southwestern pond turtle. If these special status species are present in the project site, they could be affected by activities. Best management practices (BMP-1, BMP-2, BMP-3, BMP-9, BMP-22, BMP-23, and BMP-24) require environmental education to aid workers in recognizing special status biological resources that may occur in the project site, work in dry conditions (as practicable), on-site biological monitoring, noxious weed control, pre-construction surveys, and adherence to speed limits. The effects to these special status species would be less than significant with incorporated measures.

The proposed R&M Program does not include removal or trimming of trees; therefore, the project has been designed to avoid impacts to hoary bat (*Lasiurus cinereus*) roosting habitat. In addition, the hoary bat requires a permanent water source. Flowing water is not anticipated to be present within the project site upon project initiation. Foraging bats would be expected to evade areas where repair and maintenance activities will occur with the onset of disturbance. Therefore, project activities are not expected to impact foraging bats.

Protected Nesting Birds

The BSA contains habitat that can support nesting birds, including raptors protected under the CFGC and the MBTA. The stand of coast live oak trees that occurs along the west bank of the Ventura River, and downstream near the sediment placement area provide suitable nesting habitat for avian species. The project could adversely affect raptors and other nesting birds if construction occurs while they are present within or adjacent to the restoration area, through direct mortality or abandonment of nests. Impacts to common bird species would not rise to the level of significance under CEQA; however, the loss of birds, eggs, nests, or nestlings due to construction activities would be a violation of the MBTA and CFGC Section 3503 and must therefore be avoided. BMP-8, identified in the Project Description, is recommended for compliance with the MBTA and CFGC Section 3503.

LESS THAN SIGNIFICANT IMPACT

b. Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

A southern California Steelhead Stream, the Ventura River, is present within the BSA. As stated above, the proposed R&M Program would typically occur within the Facility when conditions for SC steelhead migration would not be suitable. Therefore, potential impacts to the species are not anticipated. However, the implementation of BMPs identified in the Project Description will ensure construction materials do not indirectly impact the sensitive community, including BMP-10, BMP-11, BMP-13 through BMP-21, BMP-23, and BMP-24. Accordingly, potential impacts to the southern California steelhead stream would be less than significant.

The proposed R&M Program activities would result in impacts to aquatic habitat in the forebay (5.70 acres), when the area is dry. During Activity No. 1, removal of sediment and emergent vegetation from the Facility (i.e., forebay) and placement of sediment downstream over 4.61 acres of aquatic habitat (during dry river conditions) may have indirect effects on water quality downstream due to increased turbidity, which would have an adverse effect on aquatic wildlife and their aquatic and riparian habitats in the Ventura River. Alternatively, the placement of sediment downstream would move the active channel towards the center of the river channel and assist in clearing the center channel of vegetation. That will, in turn, establish a more stable channel through this reach of the

river, a beneficial effect to migration/dispersal habitat for aquatic species. Implementation of BMPs to control erosion and sedimentation (BMP-21) and locate equipment and materials outside of wetted areas (BMP-10) would reduce effects to less than significant.

Activity No. 4, described in detail in the Project Description, Section 9.2, *Activities Descriptions,* involves the removal of the young stand of willows, and the excavation of the entrance pool to a depth of 8 to 10 feet. The construction of the entrance pool occurred as part of the permitted Robles Diversion Fish Passage Project in 2003. The entrance pool extends approximately 130 feet below the spillway and baffled apron structure and encompasses approximately 0.19 acre (8,238 square feet) of the Ventura River low flow channel. Cleaning sediment and emergent vegetation out of the entrance pool is necessary to maintain the energy-dissipating hydraulic jump, allow proper fish entrance gate operation, and ensure overall uniform hydraulic flow patterns throughout the entrance pool. Vegetation in the entrance pool wanes during extended drought, and during high flows, it is scoured away. Typically, sediment does not accumulate in the entrance pool to the extent that it has in recent years. The sediment in the pool became trapped during intense storm events following the Thomas Fire.

The removal of the immature, small stand of willows in the entrance pool would not have a substantial adverse effect on riparian habitat of sensitive natural communities. The entrance pool is located in a fluvial area within the Ventura River where no vegetation is considered to be permanent given the natural hydrologic regime. Sediment is routinely scoured and redeposited in the entrance pool depending on storm events. The extent of vegetation in the entrance pool changes from year to year, under natural conditions. The proposed maintenance activity would occur during the dry season when surface water is absent, therefore effects to aquatic species would be less than significant. Conducting the vegetation removal outside of the breeding season (February 1 – August 31) and conducting pre-activity surveys (BMP-6) if work occurs within the breeding season would ensure compliance with the MBTA and CFGC 3503 ~~reduce impacts to avian species to less than significant~~.

LESS THAN SIGNIFICANT IMPACT

c. Would the project 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?

The Ventura River is subject to the jurisdiction of the USACE, and RWQCB, and CDFW within the BSA. Activity 1A and 1B includes the removal of sediment from the forebay and the relocation of sediment downstream of the timber cut-off wall in the Ventura River, annually. The area within the forebay where sediment removal will occur is devoid of hydrophytic vegetation. Relocation of sediment from the forebay to a portion of the river below the timber cut-off wall would restore the normal function of the forebay and eroded banks downstream and thus the project is not expected to have a substantial adverse impact on state or federally protected wetlands. In addition, no permanent impacts would occur as a result of the project. The sediment removal and relocation activity would occur during the dry season when no flowing water is present in the Ventura River (except for emergency circumstances).

Activity 4 involves the removal of trapped sediment from the entrance pool, which is located downstream of the spillway within the Ventura River low-flow channel. Occasionally, sediment becomes deposited in the entrance pool following intense storm events. Sediment and immature vegetation will be removed annually and stockpiled outside of jurisdictional areas in designated soil disposal sites. The project will occur during the dry season and no permanent impacts to the low-

flow channel will occur. All other proposed project activities will occur within the Ventura River, typically in dry conditions, and no permanent impacts to jurisdictional waters or wetlands will occur.

Indirect impacts from construction materials (e.g., stockpiled materials, construction equipment, and trash) stored on site could adversely affect water quality (e.g., increased turbidity, altered pH, decreased dissolved oxygen levels, etc.) within the water features if runoff were to occur during storm events. Therefore, BMP-10, BMP-11, and BMP-13 through BMP-21 outlined in the Project Description (Section 9) are recommended to avoid potential indirect impacts to water quality within the potentially jurisdictional waters. The implementation of these BMPs, which are identified in the Project Description and would be implemented as part of the project, would reduce potential impacts to jurisdictional waters to a less-than-significant level.

LESS THAN SIGNIFICANT IMPACT

d. Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

The Facility is located within a known wildlife corridor which provides connectivity for wildlife north of the City of Ojai, and the Ventura River facilitates regional wildlife movement through the BSA. Fully developed properties are present adjacent to the BSA and common wildlife adapted to urban and suburban areas (e.g., raccoon and striped skunk) likely use the Ventura River for local movement. However, the proposed R&M Program would not permanently modify the Ventura River. Maintenance and repair activities may result in a temporary limitation on wildlife movement within the Ventura River immediately upstream and downstream of the forebay.

Overall, the proposed R&M Program is not expected to hinder wildlife movement in the region, considering maintenance and repair activities would not create new barriers to wildlife movement. Maintenance and repair activities would be located within previously developed infrastructure and no new infrastructure is proposed. Therefore, the project would have a less than significant impact to wildlife movement.

LESS THAN SIGNIFICANT IMPACT

e. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

No removal or trimming of protected trees is proposed, therefore tree protection policies would not apply. The Ventura County General Plan (Biological Resources Policy 1.5.2-3 and 1.5.2-4) contains policies to protect potentially jurisdictional waters from development. No new development is proposed.

Within the County jurisdiction, the Ventura County Watershed Protection District (VCWPD) holds authority over its jurisdictional channels. The primary ordinance establishing VCWPD authority and the requirements to obtain permits for any encroachment into VCWPD jurisdictional channels, including right of way, is Ventura County Watershed Protection Ordinance WP-2. The Facility is owned by Reclamation and is exempt from Ordinance WP-2. The removal of sediment would occur within the forebay and entrance pool. Implementation of BMP-11 through BMP-23 would avoid and minimize potential indirect impacts to the Ventura River. Therefore, the proposed R&M Program would not conflict with local policies or ordinances protecting potentially jurisdictional waters and impacts would be less than significant.

The Ventura County General Plan contains a policy to protect habitat connectivity and wildlife migration corridors. The Facility is located within the Sierra Madre – Castaic ECA boundary. The ECA surrounds most of the infrastructure within Ojai to the north of the City. Maintenance and repair activities would not result in new permanent structures that would impede wildlife movement. Although temporary impacts to movement may occur, implementation of BMP-18 would minimize the attraction of wildlife to the project site. Therefore, the proposed R&M Program would not conflict with local policies or ordinances protecting habitat connectivity and impacts would be less than significant.

County policy regulates locally important species as significant biological resources to be protected from incompatible land uses and development. The list of locally important species was reviewed, and no species were observed within the BSA. Therefore, the proposed R&M Program would not conflict with local policies or ordinances protecting locally important species and impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

f. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

The project parcel does not occur within any HCP, NCCP, or other approved local, regional, or state habitat conservation plan areas. The proposed R&M Program would not conflict with the provisions of any such plans. Therefore, the proposed R&M Program would have no impact to HCP, NCCP, or other approved local, regional, or state habitat conservation plans.

NO IMPACT

5 Cultural Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☐	☐	■
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	■	☐	☐
c. Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	■	☐

A cultural resources assessment and technical report has been prepared for the R&M Program and is included as Appendix G to this IS-MND. This assessment consists of the following: cultural resources records search at the South Central Coastal Information Center (SCCIC), SLF search with the NAHC, pedestrian survey, and evaluation of an historic-period built-environment resource.

Rincon contacted the NAHC on March 24, 2020 to request a SLF search of the project site. The NAHC replied on April 2, 2020 with positive results for the project vicinity. The cultural resources records search identified five previously recorded archaeological resources within a 1.0-mile radius of the project site, all of which are prehistoric. Of those five resources, one consists of a village site which is likely what caused the positive SLF result. None of the recorded resources were located within or immediately adjacent to the project site. Two isolated lithic flakes were identified in imported fill-soil during the pedestrian survey. Steve Sharp with the Casitas Engineering Department confirmed the provenience of the soil where the artifacts were identified as imported fill during the survey (further discussion provided in Appendix G to this IS-MND). The isolated flakes were removed from their original context and stripped of any associations and/or data potential; thus, they were not formally recorded during the survey. No other archaeological resources were identified during the survey.

One historic era-built environment resource, the Robles Diversion Dam, is located within the project site. The Facility was previously evaluated and determined ineligible for listing in the National Register of Historic Places (NRHP) by Reclamation, a finding that received concurrence from the California State Historic Preservation Officer in September 2010 (Lopez 2019). The Facility was recorded as part of the current study and is recommended ineligible for listing in the NRHP and the California Register of Historical Resources (CRHR).

The ineligibility of the Facility for listing in the NRHP is based upon review of four criteria, summarized herein. Research did not suggest the Facility is associated with an event or series of events that made a significant contribution to the broad patterns of history in the city, region, state, or nation (Criterion 1). Research did not indicate that any persons associated with the Facility can be considered significant to local, state, or national history (Criterion 2). The Facility is utilitarian in

design and materials and is a common example of a dam complex. It does not embody distinctive characteristics of a type, period, or method of construction (Criterion 3). A review of available evidence and records search results did not indicate the Facility might yield information important to history or prehistory (Criterion 4). Therefore, the Facility does not qualify as a historical resource under CEQA.

a. Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

The results of the cultural resources records search identified one previously recorded historic era-built environment resource, the Robles Diversion Dam, within the project site. The Robles Division Dam Complex was previously determined ineligible for listing in the NRHP. As described above, the Facility has also been determined to be ineligible for the CRHR. No other historic period built-environment resources were identified on the project site. Therefore, the project would have no impact to historical resources.

NO IMPACT

b. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

The cultural resources records search did not identify any archaeological resources in project site. Two isolated lithic flakes were identified in imported fill-soil during the pedestrian survey. Because they were identified in fill soils, they lack a discernable context and were not formally recorded. No other archaeological resources were identified during the survey. However, the SLF results were positive and the records search identified five prehistoric archaeological sites within a one-mile radius of the project site. Although none of these sites extend into the project site, two are large habitation sites (P-56-000139 and P-56-000194) and two are confirmed to contain human remains (P-56-000139 and P-56-000306). These resources are located upstream from the Diversion Dam and it is possible that artifacts or remains associated with the sites could have washed downstream over time from erosion. These factors increase the likelihood of encountering buried archaeological deposits during project-related ground disturbance. However, these deposits would have been the result of recent erosion and not the result of prehistoric human activity.

Project-related ground disturbance ~~is limited to Activities 1A and 1B, which~~ may include periodic removal and downstream redeposition of accumulated sediments (Activities 1A, 1B, and 4), small and large debris removal (Activities 2 and 3), and routine maintenance of Facility infrastructure (Activity 6)~~E, which includes road grading and excavation~~. Construction activities may result in the destruction, damage, or loss of culturally and scientifically important archaeological resources. Therefore, impacts to archaeological resources would be potentially significant. Implementation of Mitigation Measure CR-1 and CR-2 during project-related ground disturbance project implementation would reduce potential impacts to a less-than-significant level by providing archaeological monitoring and direction on how to properly address an unanticipated discovery of archaeological. Although any encountered resources in these areas are likely to be within a secondary context, the heritage value of such resources to local tribal groups remains. Monitoring is consistent with tribal concerns and precedent existing for the general area.

Mitigation Measures

CR-1 Archaeological Monitoring

Archaeological monitoring of all project-related ground disturbance during Activities ~~1A and 1B and of grading and excavation during Activity 6E~~ 1-6) shall be performed by a qualified archaeologist. Archaeological monitoring shall be performed under the direction of an archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for archaeology (National Park Service 1983). Monitors will 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 area must halt and the find evaluated for listing in the CRHR and NRHP. Archaeological monitoring may be reduced to spot-checking or eliminated at the discretion of the monitors, in consultation with the lead agency, as warranted by conditions such as encountering bedrock, sediments being excavated are fill, or negative findings during the first 60 percent of rough grading. If monitoring is reduced to spot-checking, spot-checking shall occur when ground-disturbance moves to a new location within the APE and when ground disturbance will extend to depths not previously reached (unless those depths are within bedrock). Sediment already monitored during removal does not require monitoring during subsequent placement unless excavation is occurring as part of that activity.

CR-2 Unanticipated Discovery of Cultural Resources

If cultural resources are encountered during ground-disturbing activities, work in the immediate area shall be halted 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 eligible for the NRHP and/or CRHR, additional work such as data recovery excavation and Native American consultation may be warranted to mitigate any significant impacts/adverse effects.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

c. Would the project disturb any human remains, including those interred outside of formal cemeteries?

The village site adjacent to the northeast corner of the project footprint has no documented human remains. Two other sites within one mile of the project have documented burials; however, no known human remains have been documented within the project site. Therefore, the project site is considered unlikely to contain human remains; nonetheless, the potential for the recovery of human remains during ground-disturbing activities is always a possibility. In the event of an unanticipated discovery of human remains, the county coroner must be notified immediately. The State of California Health and Safety Code Section 7050.5 requires no further site disturbance until the county coroner has made a determination of origin and disposition pursuant to Public Resources Code (PRC) Section 5097.98. If the human remains are determined to be prehistoric, the coroner would notify the Native American Heritage Commission, which would determine and notify a most likely descendant (MLD). The MLD has 48 hours from being granted site access to make recommendations for the disposition of the remains. If the MLD does not make recommendations within 48 hours, the landowner shall reinter the remains in an area of the property secure from subsequent disturbance. These procedural requirements, codified under PRC Section 5097.98, do not represent mitigation measures. With compliance with existing laws and regulations for the unanticipated discovery of human remains, potential impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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6 Energy

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☐	■
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	■

As a state, California is one of the lowest per capita energy users in the United States, ranked 48th in the nation, due to its energy efficiency programs and mild climate (EIA 2020). Most of California's electricity is generated in-state with approximately ~~30~~ 29 percent imported from the Northwest and Southwest in ~~2018~~ 2022 (CEC 202~~0~~4a). In addition, approximately ~~30~~ 54 percent of California's electricity supply comes from renewable energy sources, such as wind, solar photovoltaic, geothermal, and biomass (CEC 202~~0~~4a). Adopted on September 10, 2018, Senate Bill (SB) 100 accelerates the state's Renewable Portfolio Standards Program, codified in the Public Utilities Act, by requiring electricity providers to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020, 60 percent by 2030, and 100 percent by 2045.

California also requires all motorists use California Reformulated Gasoline, which is sourced almost exclusively from in-state refineries. Gasoline is the most used transportation fuel in California with ~~15.1~~ 13.6 billion gallons sold in ~~2015~~ 2022 and is used by light-duty cars, pickup trucks, and sport utility vehicles (CEC 202~~0~~4b). Diesel is the second most used fuel in California with ~~4.2~~ 2.2 billion gallons sold in ~~2015~~ 2022 and is used primarily by heavy duty-trucks, delivery vehicles, buses, trains, ships, boats and barges, farm equipment, and heavy-duty construction and military vehicles (CEC 202~~0~~4b). Both gasoline and diesel are primarily petroleum-based, and their consumption releases greenhouse gas (GHG) emissions, including carbon dioxide and nitrogen oxides.

a. Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Energy use during construction activities would be primarily in the form of fuel consumption to operate heavy equipment, light-duty vehicles, machinery, and generators. Temporary grid power may also be provided to construction trailers or electric construction equipment. Energy use during construction would be temporary in nature, and construction equipment used would be typical of construction projects in the region. Operation of the proposed R&M Program would provide for the continued operation and maintenance of the Facility, which is an essential component of the water systems in the region, and would not result in new energy uses or expand or otherwise affect

energy uses in the project area. As such, the R&M Program would not result in the wasteful, inefficient, or unnecessary consumption of energy resources. No impact would occur.

NO IMPACT

b. Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

As mentioned above, SB 100 mandates 100 percent clean electricity for California by 2045. Because the proposed R&M Program would be powered by the existing electricity grid, the project would eventually be powered by renewable energy mandated by SB 100 and would not conflict with this statewide plan. Casitas, the City of Ojai, and the County of Ventura do not have any specific renewable energy or energy efficiency plans with which the project could comply. Nonetheless, the project would not conflict with or obstruct the state plan for renewable energy, and no impact would occur.

NO IMPACT

7 Geology and Soils

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
1. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?	☐	☐	☐	■
2. Strong seismic ground shaking?	☐	☐	☐	■
3. Seismic-related ground failure, including liquefaction?	☐	☐	■	☐
4. Landslides?	☐	☐	■	☐
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	■	☐
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	■	☐
d. Be located on expansive soil, as defined in Table 1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☐	■
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	■
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	■	☐	☐

Geologic Setting

The proposed program is located along the Ventura River within the Ojai Valley, flanked by the Santa Ynez Mountains and Topa Mountains to the north and Sulphur Mountain to the south. The project site is in the Transverse Ranges Geomorphic Province, characterized by anomalous east-west trending mountain ranges (California Geological Survey [CGS] 2002).

The Transverse Ranges province is seismically active, bounded by three major fault zones, including the San Andreas Fault and Big Pine Fault to the north and the Malibu Coast Fault to the south. Seismic events can result in groundshaking, liquefaction, landslides, subsidence, tsunami and seiche. In addition to the three major faults described above, numerous smaller faults are in and around the Ojai Valley, including the Santa Ana Fault/Mission Ridge Fault Zone and the San Cayetano Fault. The Santa Ana Fault Zone is closest to the project site, located several miles downstream of the Facility.

The Facility site and surrounding area has two geologic units mapped at the surface (Dibblee and Ehrenspeck 1987): Quaternary young (middle to late Holocene) stream channel deposits (Qg) and Quaternary young (middle to late Holocene) alluvial fan deposits (Qa). Pleistocene to early Holocene alluvial deposits (Qoa), Oligocene Sespe Formation (Tsp), and Eocene Coldwater Sandstone (Tcw) are mapped extensively near the foothills and within the Santa Ynez Mountains and Topa Mountains. Exposures of these formations near the project area, and the stratigraphic setting in the vicinity are indicative that these units underly the Holocene units mapped at the surface, at unknown depths.

Paleontological Resources Setting

The paleontological sensitivities of the geologic units underlying the project site were evaluated based on the results of an online paleontological locality search and review of existing information in the scientific literature concerning known fossils within geologic units mapped within the project area. Fossil collections records from the Paleobiology Database and University of California Museum of Paleontology (UCMP) online database were reviewed, which contain known fossil localities in Ventura County (Paleobiology Database 2020; UCMP 2020). Based on the available information contained within existing scientific literature and the UCMP database, a paleontological sensitivity was assigned to each of the geologic units within the project site. The potential for impacts to scientifically important paleontological resources is based on the potential for ground disturbance to directly impact paleontologically sensitive geologic units. The Society of Vertebrate Paleontology (SVP) has developed a system for assessing paleontological sensitivity and describes sedimentary rock units as having high, low, undetermined, or no potential for containing scientifically significant nonrenewable paleontological resources (SVP 2010). This system is based on rock units within which vertebrate or significant invertebrate fossils have been determined by previous studies to be present or likely to be present.

Older alluvial sediments of late Pleistocene to early Holocene age, Oligocene Sespe Formation, or Eocene Coldwater Sandstone could preserve fossils at shallow depths. Accurately assessing the boundaries between younger and older units is generally not possible without site-specific stratigraphic data, radiometric dating or fossil analysis; however, in a fluvial system where erosion and deposition are actively occurring, underlying geologic units can occur near the surface, especially in areas near basin margins. A conservative estimate of the depth at which paleontologically sensitive units may occur ensures impact avoidance. Given the proximity of the proposed R&M Program to the surrounding mountains (i.e., Santa Ynez Mountains and Topa Mountains) and the prevalence of older deposits (e.g., Qoa) mapped at the surface throughout the

region, it is estimated the transition between younger alluvial sediments (i.e., Qa) and older units could occur at depths as shallow as three feet below ground surface.

Stream Channel Deposits: Middle to late Holocene stream channel (fluvial) deposits consist of loose, moderately well-drained, moderately sorted sand, silty sand, and occasional cobbles and boulders forming natural levees along streams (Dibblee and Ehrenspeck 1987; United States Geological Survey 1985). Intact middle to late Holocene fluvial deposits at the Facility are relatively young and have been subject to various flooding events from the hydrologically active Ventura River, resulting in an environment which is not conducive for the preservation of paleontological resources. Therefore, these sediments are assigned a **low paleontological sensitivity** (SVP 2010).

Alluvial Fan Deposits

Middle to late Holocene alluvial fan deposits are composed of unconsolidated to moderately consolidated, silt, sand, and gravel. Middle to late Holocene alluvial fan deposits are typically too young (i.e., less than 5,000 years old) to preserve paleontological resources and are also determined to have a **low paleontological sensitivity** according to SVP (2010) standards. Figure 10 depicts the surficial geologic units within the Facility and its immediate vicinity, as well as the paleontological sensitivity within the bounds of the Facility.

Pleistocene Alluvium

Pleistocene alluvial deposits, consisting of weakly-consolidated sediments of gravel, sand, and silt, have yielded significant vertebrate fossil localities throughout southern California from the coastal areas to the inland valleys. These localities have produced fossil specimens of terrestrial mammals such as mammoth, horse, camel, bison, rodent, bird, and reptile (Jefferson 2010; UCMP 2020). Pleistocene to early Holocene alluvial deposits (Qoa) is assigned a **high paleontological sensitivity**.

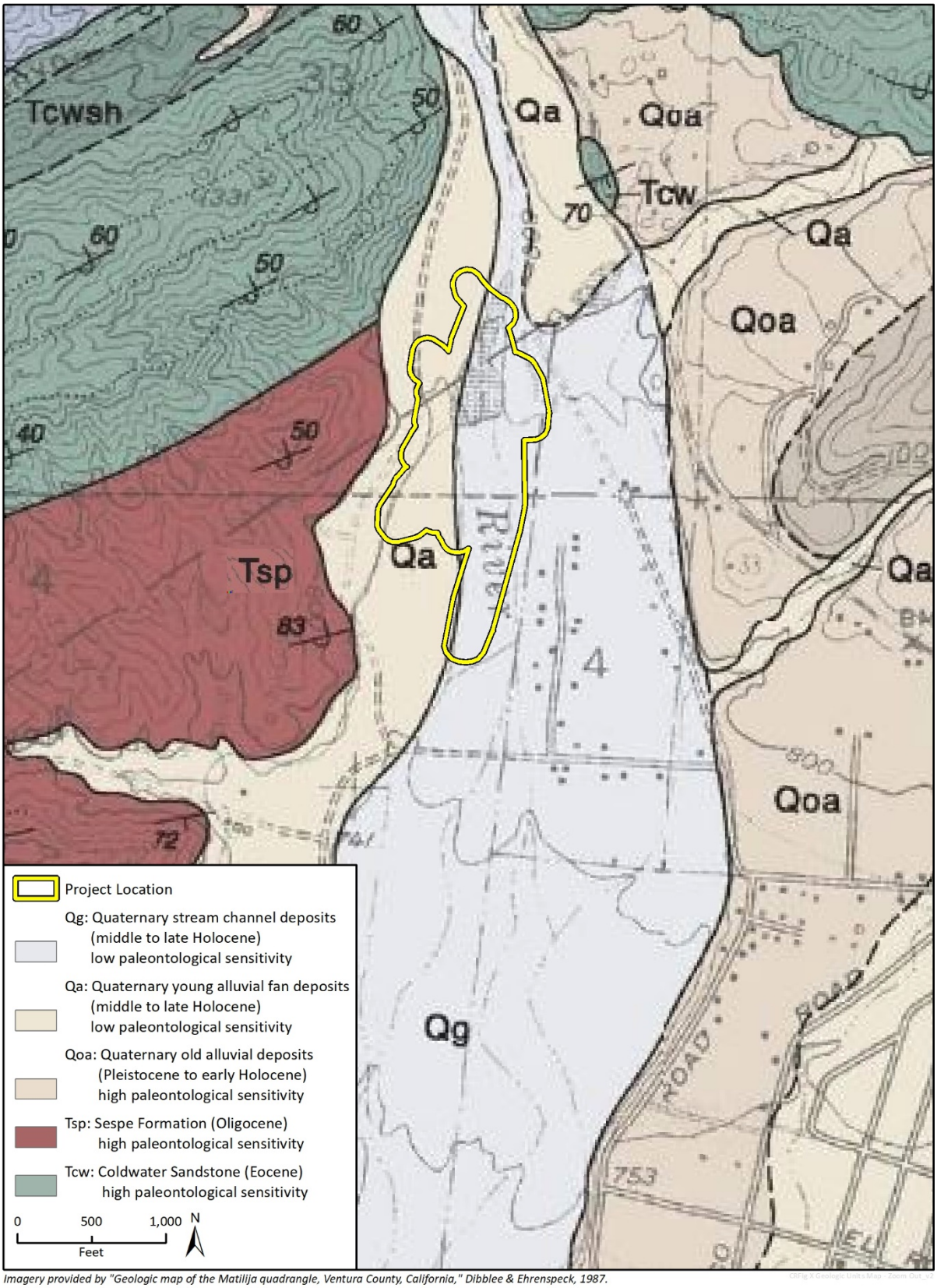
Sespe Formation

The non-marine Sespe Formation is composed of red-brown to yellow-brown, well-indurated, commonly crossbedded sandstone with imbricated pebble conglomerate and dark brown claystone. The Sespe Formation has yielded numerous fossil specimens of at least 35 mammalian, rodent, reptile, and bird species (Paleobiology Database 2020; UCMP 2020). The Oligocene Sespe Formation (Tsp) is assigned a **high paleontological sensitivity**.

Coldwater Sandstone

The marine Coldwater Sandstone is composed of sandstone, greenish-gray shale and siltstone, pebble conglomerate, and oyster reef debris (Dibblee and Ehrenspeck 1987). The Coldwater Formation has produced various invertebrate and microfossil localities and at least two vertebrate localities yielding unidentified mammalian specimens (Paleobiology Database 2020; UCMP 2020). The Eocene Coldwater Sandstone (Tcw) is assigned a **high paleontological sensitivity**.

Figure 10 Geologic Units and Paleontological Sensitivity of the Proposed Project



Imagery provided by "Geologic map of the Matilija quadrangle, Ventura County, California," Dibblee & Ehrenspeck, 1987.

a.1. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

a.2. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?

The CGS has mapped "Earthquake-Induced Landslide Zones" for the Matilija Quadrangle, which includes areas where previous landslide movement has occurred, or where local topographic, geological, geotechnical, and subsurface water conditions indicate a potential for permanent ground displacements (CGS 2003). The Facility is not identified as being within an Earthquake-Induced Landslide Zone, and implementation of the program would not introduce or otherwise exacerbate existing potential for seismic-related landslides to occur.

Many of the hillsides surrounding the Facility site are identified as "Earthquake-Induced Landslide Zones" and may experience seismic-related landslides during implementation of the program. If the Facility site is affected by landslides on nearby hillsides, such as by receiving sediment flow from upstream landslide areas, the landslide-related sediment and debris would be removed from the Facility as part of regular operation and maintenance of the R&M Program. As described in the Project Description, Section 9.2, *Activities Descriptions*, maintaining the depth and volume of the forebay is critical to the operation of the Facility. Casitas has maintained the forebay footprint of 5.70 acres since the severe storms in 1978, and sediment and vegetation is removed from the forebay on average every four years. As described, the forebay requires annual maintenance, especially after heavy rainfall years, or during post-fire watershed recovery periods; this would include clearing out the Facility if inundated by earthquake-induced landslides from the surrounding hillsides. Therefore, potential impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

a.3. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related liquefaction?

The Facility is located along the Ventura River, within the channel, and this area has been identified by the CGS as being a "Liquefaction Zone," or an area where liquefaction has historically occurred, or where the local geological, geotechnical, and groundwater conditions indicate a potential for permanent ground displacements such that measures defined in PRC Section 2693(c) would be required (CGS 2003). The proposed program would not construct a new structure such that mitigation under PRC Section 2693(c) would be required. The program would not introduce or exacerbate existing liquefaction potential and would not directly or indirectly cause adverse effects associated with liquefaction. However, due to being located within a Liquefaction Zone, it is possible that the site may be subject to liquefaction during implementation of the program. The program would not introduce structures or residents to the area, and would not increase the risk of loss, injury, or death involving seismic-related liquefaction. Therefore, potential impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

a.4. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related landslides?

The CGS has mapped "Earthquake-Induced Landslide Zones" for the Matilija Quadrangle, which includes areas where previous landslide movement has occurred, or where local topographic, geological, geotechnical, and subsurface water conditions indicate a potential for permanent ground displacements (CGS 2003). The Facility is not identified as being within an Earthquake-Induced Landslide Zone, and implementation of the program would not introduce or otherwise exacerbate existing potential for seismic-related landslides to occur.

Many of the hillsides surrounding the Facility site are identified as "Earthquake-Induced Landslide Zones" and may experience seismic-related landslides during implementation of the program. If the Facility site is affected by landslides on nearby hillsides, such as by receiving sediment flow from upstream landslide areas, the Facility would be maintained as proposed under the R&M Program. Potential impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

b. Would the project result in substantial soil erosion or the loss of topsoil?

Soils at the Facility are comprised of the bed of the Ventura River, which consists primarily of riverwash and Cortina stony sandy loam (USDA 2020). Cortina stony sandy loam is in Hydrologic Soil Group A, which typically consist of less than 10 percent clay and more than 90 percent sand or gravel. The program would not involve ground disturbance of soils in their native context such that substantial loss of topsoil would occur; areas disturbed by project implementation have generally been previously disturbed through implementation of the Reclamation's Ventura River Project. Ground-disturbing activities including grading would not occur when there is flowing water present, and a suite of BMPs for erosion and sediment control would be implemented during all applicable program activities.

Erosion within the Ventura River channel is a natural process that the R&M Program has been designed specifically to account for. For instance, Activity 1A would restore the forebay's operational volume each year by removing accumulated sediment and debris, returning the forebay ~~closer~~ to its ~~historical~~ operational ~~grade~~ volume; in turn, Activity 1B would also restore intended channel conditions downstream by relocating sediment from the forebay in storm-eroded areas within 1,100 linear feet of downstream channel. This topic is additionally addressed under Section (10), *Hydrology and Water Quality,* item (c)(i). BMPs included in the Project Description (see Project Description Section 10) would also minimize or avoid soil erosion associated with program activities as discussed below.

- BMP-14, *Tracking Loose Material*, requires site cleaning activities such as street sweeping, vacuuming, and rumble plates for active construction areas, to avoid tracking loose construction material and disturbed soils off site.
- BMP-15, *Stabilize Exposed Soil*, applies to Activities 1, 4, 6A, and 6E to minimize ground-disturbing activities in channels and basins by limiting such activities to areas that can be stabilized prior to rain events. Activity 1 involves sediment removal and relocation; Activity 4 also involves sediment removal from the entrance pool to maintain the energy-dissipating hydraulic jump, allow proper fish entrance gate operation, and ensure overall uniform hydraulic flow patterns. Activity 6A, *Timber Cut-off Wall Repair and Maintenance,* would also involve sediment movement, consisting of the replacement of timbers and rock riprap where washed out by large storms, and restoration of the downstream channel to the desired slope. Finally,

Activity 6E would provide road maintenance on an as-needed basis. BMP-15 would be implemented for all these activities to minimize or avoid potential adverse effects associated with erosion and sedimentation.

- BMP-16, *Avoid Road Base Discharge*, applies to Activities 1 and 6E, and prohibits the placement of road base, fill, or sediments beyond the previously established roadbed when working adjacent to the river channel, thereby minimizing or avoiding potential for disturbed sediments to discharge into surface waters.
- BMP-21, *Best Management Practice to Prevent Erosion,* applies to all program activities except Activity 1B which will place excavated sediments in the primary placement area, and requires spoils are spread in a manner to avoid or minimize erosion risk.

As discussed in the Project Description, Section 11, *Annual Monitoring and Reporting Program*, Casitas will prepare a maintenance and repair plan for work planned to be conducted during dry conditions within the work period in the upcoming ~~each Spring for the next~~ fiscal year (July 1 – June 30). The plan may be updated during the year as field conditions change. Under the proposed R&M Program, Casitas will identify the proposed maintenance and repair work for the year, including BMPs to implement with the planned maintenance work, such as any seasonal or geographic restrictions affecting the timing, methods, and limits of the planned work. With the implementation of applicable BMPs for erosion control, implementation of the R&M Program would not result in substantial soil erosion or the loss of topsoil, and potential impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

c. Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

As discussed above for criterion (a), the Facility is located within a Liquefaction Zone, and hillsides surrounding the site are located within Earthquake-Induced Landslide Zones. Implementation of the R&M Program would not introduce or exacerbate existing seismic-related hazards in the area, including as related to landslide, lateral spreading, subsidence, liquefaction, and collapse. The Facility's location within the Ventura River bed is characterized by more than 90 percent sand and gravel, as described above for criterion (b); this soil type is not susceptible to lateral spreading, subsidence, or collapse. If the Facility is affected by sediment and debris flows associated with a geologic event such as liquefaction or landslide, regular operation and maintenance of the Facility would clear accumulated materials to avoid adverse impact. Potential impacts associated with the stability of geologic units or soils would be less than significant.

LESS THAN SIGNIFICANT IMPACT

d. Would the project be located on expansive soil, as defined in Table 1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

e. Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

As described above for criterion (b), soils at the Facility are primarily characterized as stony sandy loam; this soil type is not subject to expansive characteristics, as it is generally less than 10 percent clay. No impact associated with expansive soil would occur.

Implementation of the R&M Program would not include a new septic tank or alternative wastewater disposal system. The program would not introduce a new wastewater stream. No impact associated with wastewater disposal would occur.

NO IMPACT

f. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Proposed maintenance activities associated with the Facility include: sediment removal; vegetation control; repair and maintenance of the radial gates (at the entrance to the headworks and spillway); instrumentation; and road maintenance. Repair activities would also include concrete work within the existing footprint of the Facility and replacement of wood timbers (timber cut-off wall and debris fence). Given the nature of the proposed improvements, project-related ground disturbance (i.e., excavations) is not anticipated to include ground disturbance of greater than three feet in previously undisturbed areas and is thus unlikely to impact fossiliferous deposits or result in significant impacts to paleontological resources. Impacts to paleontological resources would only occur in the unlikely situation of sensitive geologic units occurring at depths of less than three feet.

Mitigation Measures GEO-1 and GEO-2 are required in the case of unanticipated fossil discoveries if high sensitivity units occur at depths of less than three feet, and to provide training to maintenance crews to identify fossils if they are encountered. Mitigation Measures GEO-1 and GEO-2 would apply to all phases of project construction and would ensure that potential impacts to paleontological resources would be less than significant by providing for the recovery, identification and curation of previously unrecovered fossils.

Mitigation Measures

GEO-1 Worker's Environmental Awareness Program

Prior to any project ground disturbance, a WEAP will be prepared and used to train all site personnel prior to the start of work. The WEAP training will include at a minimum the following information:

- Review of local and state laws and regulations pertaining to paleontological resources
- Types of fossils that could be encountered during ground disturbing activity
- Photos of example fossils that could occur on site for reference
- Instructions on the procedures to be implemented should unanticipated fossils be encountered during construction, including stopping work in the vicinity of the find and contacting a qualified professional paleontologist

GEO-2 Unanticipated Discovery of Paleontological Resources

In the event an unanticipated fossil discovery is made during the course of project development, construction activity should be halted in the immediate vicinity of the fossil, and a qualified professional paleontologist shall be notified and retained to evaluate the discovery, determine its significance, and determine if additional mitigation or treatment is warranted. Work in the area of the discovery will resume once the find is properly documented and authorization is given to resume construction work. Any significant paleontological resources found during construction monitoring shall be prepared, identified, analyzed, and permanently curated in an approved regional museum repository under the oversight of the qualified paleontologist.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

8 Greenhouse Gas Emissions

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	■	☐
b. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	■	☐

Background

Climate change is the observed increase in the average temperature of the Earth's atmosphere and oceans along with other substantial changes in climate (such as wind patterns, precipitation, and storms) over an extended period. Climate change is the result of numerous, cumulative sources of GHGs contributing to the "greenhouse effect," a natural occurrence which takes place in Earth's atmosphere to help regulate the temperature of the planet. Most of the radiation from the sun hits Earth's surface and warms it. The surface, in turn, radiates heat back towards the atmosphere in the form of infrared radiation. Gases and clouds in the atmosphere trap and prevent some of this heat from escaping into space and re-radiate it in all directions, but anthropogenic activities since the beginning of the industrial revolution (approximately 250 years ago) are adding to the natural greenhouse effect by increasing the gases in the atmosphere which trap heat. Emissions resulting from human activities thereby contribute to an average increase in Earth's temperature.

GHGs occur both naturally and as a result of human activities, such as fossil fuel burning, methane generated by landfill wastes and raising livestock, deforestation activities, and some agricultural practices. GHGs produced by human activities include carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFC), perfluorocarbons (PFC), and sulfur hexafluoride (SF_6). Since 1750, estimated concentrations of CO_2, CH_4, and N_2O in the atmosphere have increased over by 36 percent, 148 percent, and 18 percent, respectively, primarily due to human activity. Potential climate change impacts in California may include loss of snowpack, sea level rise, more extreme heat days per year, more high ozone days, more large forest fires, and more drought years (State of California 2018).

In response to climate change, California implemented Assembly Bill (AB) 32, the "California Global Warming Solutions Act of 2006." AB 32 requires the reduction of statewide GHG emissions to 1990 emissions levels (essentially a 15 percent reduction below 2005 emission levels) and the adoption of rules and regulations to achieve the maximum technologically feasible and cost-effective GHG emissions reductions. ~~On September 8, 2016, the governor signed SB 32 into law, extending AB 32 by requiring the State to further reduce GHGs to 40 percent below 1990 levels by 2030 (the other provisions of AB 32 remain unchanged). On December 14, 2017, CARB adopted the 2017 Scoping~~

~~Plan, which provides a framework for achieving the 2030 target. As with the 2013 Scoping Plan Update, the 2017 Scoping Plan does not provide project-level thresholds for land use development. Instead, it recommends local governments adopt policies and locally appropriate quantitative thresholds consistent with a statewide per capita goal of six metric tons (MT) of CO_2e by 2030 and two MT of CO_2e by 2050 (CARB 2017).~~ On September 16, 2022, California passed AB 1279, which declared the State would achieve net zero GHG emissions as soon as possible, but no later than 2045, and to achieve and maintain net negative GHG emissions thereafter. In addition, the bill states that the State would reduce GHG emissions by 85 percent below 1990 levels no later than 2045. In response to AB 1279, CARB published the Final 2022 Climate Change Scoping Plan in November 2022 which includes policies to achieve a substantial reduction in fossil fuel combustion, further reductions in short-lived climate pollutants, support for sustainable development, increased action on natural and working lands (NWL) to reduce emissions and sequester carbon, and the capture and storage of carbon (CARB 2022).

Significance Thresholds

Most individual projects do not generate sufficient GHG emissions to influence climate change directly. Physical changes caused by a project can contribute incrementally to significant cumulative effects, even if individual changes resulting from a project are limited. The issue of climate change typically involves an analysis of whether a project's contribution towards an impact would be cumulatively considerable. "Cumulatively considerable" means the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, other current projects, and probable future projects (CEQA Guidelines Section 15064[h][1]).

According to CEQA Guidelines Section 15183.5(b), projects can tier from a qualified GHG reduction plan, which allows for project-level evaluation of GHG emissions through the comparison of the project's consistency with the GHG reduction policies included in a qualified GHG reduction plan. This approach is considered by the Association of Environmental Professionals (2016) in its white paper, *Beyond Newhall and 2020*, to be the most defensible approach presently available under CEQA to determine the significance of a project's GHG emissions. Casitas does not currently have a formal CAP or GHG reduction plan. Thus, this approach is not currently feasible for this analysis.

To evaluate whether a project may generate a quantity of GHG emissions with the potential to have a significant impact on the environment, local air districts developed a number of bright-line significance thresholds. Significance thresholds are numeric mass emissions thresholds that identify the level at which additional analysis of project GHG emissions is necessary. If project emissions are equal to or below the significance threshold, with or without mitigation, the project's GHG emissions would be less than significant.

VCAPCD has not established quantitative significance thresholds for evaluating GHG emissions in CEQA analyses, but it recommends using the California Air Pollution Control Officers Association (2008) *CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act* white paper and other resources when developing GHG evaluations (VCAPCD 2006). The *CEQA and Climate Change* paper provides a common platform of information and tools to support local governments and was prepared as a resource, not as a guidance document. CEQA Guidelines Section 15064.4 expressly provides a "lead agency shall have discretion to determine, in the context of a particular project," whether to "[u]se a model or methodology to quantify greenhouse gas emissions resulting from a project, and which model or methodology to use." A lead agency also has discretion under the CEQA Guidelines to "[r]ely on a qualitative analysis or [quantitative] performance-based standards."

Considering the lack of a specific GHG threshold from VCAPCD, it is appropriate to refer to guidance from other agencies when discussing GHG emissions. SCAQMD's thresholds of significance were established based on achieving the 2020 GHG emission reduction targets set forth in the AB 32 Scoping Plan. For developments that would occur beyond 2020, the mass emissions or bright-line threshold of significance (3,000 MT of CO_2e per year) is adjusted to a "substantial progress" threshold calculated based on the SB 32 target of a 40 percent reduction in GHG emissions below 1990 levels (Association of Environmental Professionals 2016). Because the 2020 GHG targets in the AB 32 Scoping Plan are designed to reduce GHG emissions to 1990 levels, it follows that the threshold of SCAQMD threshold of 3,000 MT of CO_2e per year must decrease by 40 percent by 2030 to meet the statewide 2030 GHG emission reduction targets. Therefore, for the purposes of this analysis, the proposed R&M Program's year 2030 GHG emissions would be significant if they would exceed 1,800 MT of CO_2e per year.

a. Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?

The proposed R&M activities would generate GHG emissions from operation of heavy machinery as well as equipment and materials haul truck trips and worker trips to and from the project site. GHG emissions generated by the proposed program were estimated using CalEEMod version 2016.3.2 and the conservative, "worst-case" scenario assumptions for program activities described in Section 3, *Air Quality*. For the purposes of the GHG analysis, it was conservatively assumed that each program activity would occur annually. In reality, it is unlikely all activities would occur in any given year due to weather, fiscal, and need constraints.

Table 8 shows the breakdown of annual GHG emissions generated by implementation of the proposed program.

Table 8 Estimated Annual GHG Emissions

Activity	Emissions (MT of CO_2e per year)
Activity No. 1 Forebay Sediment	199.1
Activity No. 2 Fish Ladder, Screenbay, High-flow Bypass	2.9
Activity No. 3 Rock Weir and Measurement Weir	1.0
Activity No. 4 Entrance Pool	6.3
Activity No. 5 Concrete Structures	17.7
Activity No. 6 Routine Maintenance	
Timber Cut-Off Wall	37.3
Debris Fence	1.5
Radial Gates	0.8
Instrumentation	0.1
Road Maintenance	5.8
Total Annual Emissions	**272.5**

Significance Threshold	1,800
Threshold Exceeded?	**No**

CO_2e = carbon dioxide equivalent; MT = metric tons; SCAQMD = South Coast Air Quality Management District
See Appendix G for CalEEMod results. Values are approximations and have been rounded to nearest tenth. This table shows "mitigated" results from the unmitigated CalEEMod model, which does not incorporate Mitigation Measures AQ-1 through -3.

As shown in Table 8, the proposed R&M Program's total annual emissions of 272.5 MT of CO_2e fall below the bright-line significance threshold of 1,800 MT of CO_2e per year. Therefore, impacts related to GHG emissions would be less than significant. In addition, this emissions estimate does not account for Mitigation Measure AQ-2, which would further reduce GHG emissions by reducing the number of haul truck trips.

LESS THAN SIGNIFICANT IMPACT

b. Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

The VCAPCD and Casitas have not adopted any plans, policies, or regulations for the purpose of reducing GHG emissions. Accordingly, the most directly applicable adopted regulatory plan to reduce GHG emissions is CARB's 2022 Scoping Plan. The 2022 Scoping Plan identifies priority GHG reduction strategies related to transportation electrification, building decarbonization, and VMT reduction, which are inapplicable to the project (CARB 2022). ~~However, b~~Because the proposed R&M Program would not result in a significant increase in GHG emissions, it would not conflict with any applicable plans, policies, or regulations for the purpose of reducing GHG emissions within the 2022 Scoping Plan. Therefore, this impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

9 Hazards and Hazardous Materials

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	■	☐
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	■	☐
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?	☐	☐	■	☐
d. Be located on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	■
e. For a project located in an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	■
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	■	☐
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	☐	☐	■	☐

a. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

b. Would the project 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?

R&M Program activities would temporarily increase the transport, use, and storage of hazardous materials in the project area using heavy-duty vehicles and equipment. Such hazardous materials include diesel fuel, oil, solvents, and other similar materials. Such materials would be properly handled and disposed of in accordance with applicable laws and regulations. In addition, the Project Description, Section 10, identifies multiple BMPs to address the handling, use, and disposal of hazardous materials, as discussed below.

- BMP-11, *Pollutant Management*, requires that all vehicles and equipment are in good working condition and free of leaks. Stationary equipment located within or adjacent to the river will be positioned over drip pans to avoid the discharge of accidentally leaked fluids onto the riverbed.
- BMP-12, *Pollution Prevention,* requires the placement of sediment control features such as silt barriers, sandbags, and straw wattles or bales as appropriate to prevent the discharge of silt or pollutants off the project site.
- BMP-13, *Material Storage,* requires that materials are stored on impervious surfaces or plastic ground covers to prevent accidental spill or discharge of potentially hazardous materials into the Ventura River. In addition, perimeter barriers including but not limited to berms, silt fences, fiber rolls, sand/gravel bags, and straw bale barriers, will be applied to active construction sites to prevent the discharge of construction materials and spoils.
- BMP-18, *Site Materials and Refuse Management,* requires that at project completion, all debris, vehicles, building materials, and rubbish be removed from the area.
- BMP-19, *Re-fueling and Maintenance*, requires that all re-fueling, cleaning, or maintenance of equipment will occur at least 100 feet from the Ventura River. BMP-11, *Pollutant Management*, implemented concurrently with BMP-19, would also employ the use of plastic sheeting or impervious surfaces and perimeter runoff control during re-fueling activities, thereby minimizing potential for fuels to spill and discharge from the site.
- BMP-20, *Responding to Spilled Materials*, requires the development and implementation of a Spill Prevention Plan during all program activities.

The BMPs provided above are applicable to all R&M Program activities, but would be most prevalent during Activities 1A and 1B, due to the use of heavy equipment and machinery to remove accumulated sediment from the forebay and relocate it within the downstream placement area in the Ventura River channel downstream of the timber wall, as shown on Figure 3.

In addition, during Activity 5, which would implement concrete repairs at the spillway, the concrete protective rip-rap, the measurement weir, and the baffled apron as needed, BMP-17, *Concrete Washout Protocol*, would require the use of a vacuum system when sandblasting or jackhammering concrete occurs, to avoid release of materials to surface waters. Figure 7 shows where concrete work within the Facility would occur under Activity 5; all concrete work would be limited to the existing disturbance area. BMP-17 would also implement other measures as applicable to contain concrete work areas and safely stockpile concrete wastes separately from sediment and with erosion control measures to prevent discharge to the Ventura River.

With the implementation of BMPs included in all R&M Program activities, the program would not create a significant hazard to the public or the environmental due to the transport, use, disposal, or accidental release of hazardous materials. Potential impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

c. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?

The closest school to the Facility is Meiners Oaks Elementary School, located more than several miles away, in the community of Meiners Oaks. Implementation of the R&M Program would not emit hazardous emissions or handle acutely hazardous materials, substance, or waste within 0.25 mile of an existing or proposed school. Sediment removal activities would temporarily increase the transport, use, and storage of hazardous materials in the project area using heavy-duty vehicles and equipment. Such hazardous materials include diesel fuel, oil, solvents, and other similar materials that are typical of the operation and maintenance activities presently occurring at the Facility.

During Activity No. 1B, sediment removed from the forebay would be relocated to the downstream placement area which would allow sediment to remain in the Ventura River and be transported downstream as it would naturally. ~~until the planned channel contours and elevation is accomplished.~~ Excess sediment would be stored in on-site stockpile areas or transported to an approved off-site disposal location if needed. Off-site sediment disposal would involve the use of heavy trucks transporting excavated sediment from the Facility site to a nearby approved waste disposal site. These trucks would likely travel within 0.25 of an existing or proposed school; however, such presence would be transitory and limited to the execution of Activity 1B, when needed. Furthermore, the presence of heavy trucks on local roadways is consistent with existing conditions for Facility operation and maintenance. Potential impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

d. Would the project be located on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

e. For a project located in an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

Neither the Facility nor the surrounding area has been identified on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5, and implementation of the program would not result in a significant hazard to the public or the environment due to a hazardous material site. In addition, the Facility is not within an airport land use plan area or within two miles of a public airport. No impact associated with a public airport or public use airport would occur.

NO IMPACT

f. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Continued implementation of the R&M Program would not require roadway/lane closures or detours on roadways used for an adopted emergency response plan or emergency evacuation plan. Access roads to the Facility are shown on Figure 8, and include a southern access road that begins at

the entrance gate to the Facility at the terminus of North Rice Road and continues southwest across the Ventura River, as well as a northern access road which traverses the Ventura River upstream of the forebay. These roads are located on Reclamation lands and are generally used by contractors to complete the forebay restoration project (Activity 1) annually under existing conditions, which would persist under the R&M Program. Activity 6E, *Road Maintenance,* would include the annual grading and shaping of Facility access roads on an as-needed basis. This activity would occur over approximately two to three weeks and may include temporary access restrictions; however, such restrictions would be temporary, planned, and of short duration, and would not impair the implementation of an adopted emergency response plan or emergency evacuation plan. Potential impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

g. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

Please see Section 20, *Wildfire*. The Facility is located along the Ventura River, in a High Fire Hazard Severity Zone. However, the R&M Program would not introduce or alter any structures, and would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. Accordingly, potential impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

10 Hydrology and Water Quality

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	■	☐
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	■	☐
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
(i) Result in substantial erosion or siltation on- or off-site;	☐	☐	■	☐
(ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	■	☐
(iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	■	☐
(iv) Impede or redirect flood flows?	☐	☐	■	☐
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	■	☐
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	■

a. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

The Project Description identifies that multiple regulatory approvals are required for operation and maintenance of the Facility; Figure 9 (Annual Monitoring and Reporting Flow Diagram) identifies how the R&M Program regulatory approvals will be addressed on an annual basis.

R&M Program activities would comply with the requirements of the NPDES Construction General Permit and the applicable General NPDES Permits for Discharges of Groundwater from Construction. The NPDES Construction General Permit requires preparation and implementation of a project specific SWPPP, which requires operators to implement pollution prevention controls to minimize the discharge of pollutants from stormwater and spilled or leaked materials. Such controls include installation of silt fencing and sandbag barriers, covering of stockpiles, use of desilting basins, and post-construction revegetation and drainage requirements. In addition, compliance with the County of Ventura's MS4 Permit would require the implementation of an effective combination of erosion and sediment control BMPs, such as hydraulic mulch and hydroseeding, spill prevention and control, soil binders, and street sweeping, as needed. In addition, the General NPDES Permit for Discharges of Groundwater from Construction in coastal watersheds of Ventura County requires compliance with effluent limitations for reportable pollutants, discharge prohibitions, and a project-specific Monitoring and Reporting Program.

As described in the Project Description, *Introduction*, maintenance and repair activities for the Facility would be planned on an annual basis, and a list of planned work would be submitted to regulatory agencies with permitting authority over the program, including the Los Angeles RWQCB, which is responsible for implementing the NPDES Construction General Permit. ~~Casitas expects all regulatory agencies to issue an NTP for program activities within 30 days of receiving the list of planned maintenance and repair activities.~~ Work will commence in accordance with the R&M Program's permits and authorizations. Casitas will coordinate the implementation of the environmental BMPs identified in the Project Description, Section 10, and permit conditions during the year. At the end of the year, an annual report documenting all work performed and the successful use of the BMPs will be submitted to the regulatory agencies including the RWQCB for their records. The R&M Program's annual monitoring and reporting program is discussed in the Project Description, Section 11, *Annual Monitoring and Reporting Program.*

As previously discussed in Section (4), *Biological Resources*, construction-related materials (e.g., stockpiled materials, construction equipment, and trash) stored on the project site during construction could adversely affect water quality (e.g., increased turbidity, altered pH, decreased dissolved oxygen levels, etc.) within the Ventura River if runoff were to occur during storm events; however, ground-disturbing activities would occur during dry conditions, and multiple BMPs would be implemented to avoid or minimize the potential for water quality degradation to occur. In addition, as discussed for Section (9), *Hazards and Hazardous Materials,* the R&M Program also includes implementation of multiple BMPs to minimize the potential for accidental upset or release of potentially hazardous materials, such as vehicle fuels and fluids, to occur during program activities.

Compliance with applicable erosion and sediment control permitting and regulatory requirements would minimize potential surface water quality impacts associated with project construction and compliance with applicable effluent limitations for reportable pollutants, discharge prohibitions, and a project-specific Monitoring and Reporting Program for groundwater discharge would minimize potential construction groundwater quality impacts. As such, the program is designed to provide compliance with water quality standards and waste discharge requirements. With the

implementation of project-specific BMPs to minimize or avoid potential impacts associated with accident or upset conditions as described in Section (4), *Biological Resources*, and Section (9), *Hazards and Hazardous Materials*, potential impacts associated with water quality standards, waste discharge requirements, and water quality degradation would be less than significant.

LESS THAN SIGNIFICANT IMPACT

b. Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Groundwater supplies could be affected through directly pumping groundwater, or indirectly through interfering with groundwater recharge. Groundwater may be used as a water supply during program implementation because Casitas' water supply is provided as local surface water in Lake Casitas, and local groundwater obtained from Casitas' Mira Monte Well. Program activities that would require a water supply include dust suppression during ground disturbance and sediment removal and disposal activities. The program would also require an occasional water source for the manufacture of concrete, when needed for instance during Activity 5, for maintenance of the concrete structures. Casitas' water supplies are managed per the direction of an Urban Water Management Plan (UWMP) that is updated every five years in accordance with the law (Casitas ~~2016~~ 2021). In addition, water uses associated with implementation of the R&M Program would be consistent with existing water uses to operate and maintain the Facility, and the program would not introduce a new water demand.

Interference with groundwater recharge rates or patterns can occur if substantial new areas of impermeable surfaces are introduced and redirect surface runoff or inhibit infiltration to the subsurface. Implementation of the R&M Program would not introduce substantial new areas of impermeable surfaces, which most commonly occur as concrete, asphalt, or a comparable material. Program activities (Activity 1B) would include the placement of removed sediment at downstream locations within the existing channel; such sediment placement activities are authorized via existing regulatory permits issued by the RWQCB, the CDFW, and the USACE. The sediment placement activities would restore intended channel conditions downstream by relocating sediment from storm-eroded areas of the forebay to downstream channel areas where active flow would not be impeded. In addition, the placed sediment would shore up the channel banks downstream of the timber cut-off wall, where the channel banks have been eroded by heavy storms. These areas naturally experience erosion in response to storm events, which would continue to occur with implementation of the R&M Program. Sediment would remain in the Ventura River and be transported downstream as it would naturally. The in-channel placement of removed sediment under Activity 1B would not result in indirect adverse impacts to groundwater resources, including but not limited to the rate or pattern of groundwater infiltration and replenishment.

Potential impacts to groundwater supply would be less than significant.

LESS THAN SIGNIFICANT IMPACT

c.(i) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site?

The Ventura River was altered as a result of the Ventura River Project, of which the Facility is a primary component; please see the Project Description, *Introduction* for a background discussion of

previous development of the Ventura River Project. The R&M Program would not alter the course of the Ventura River or any other stream or river and would not introduce new impervious surfaces. Implementation of the R&M Program would restore and maintain the planned capacity of the Facility, restoring site-specific drainage patterns both upstream and downstream of the Facility. Activity 1A would restore the forebay's operational volume each year by removing accumulated sediment and debris, returning the forebay closer to its historical operational grade. In turn, Activity 1B would also restore intended channel conditions downstream by relocating sediment from the forebay in storm-eroded areas within 1,100 linear feet of downstream channel. The sediment would be placed where active flow within the channel would not be impeded; sediment would remain in the Ventura River and be transported downstream as it would naturally. Additionally, the downstream placement of removed sediment would shore up the channel banks downstream of the timber cut-off wall, where the channel banks have been eroded by heavy storms. These areas naturally experience erosion in response to storm events, which would continue to occur with implementation of the R&M Program.

As described in the Project Description, Section 9.2, *Activity No. 1 Forebay Sediment*, Casitas has conducted extensive study of the sediment placement area downstream of the timber cut-off wall, including the completion of a photogrammetric aerial survey of the area. Casitas has also developed a fill design for the downstream placement area, which defines the desired contours and elevation of the streambed. Ongoing operation and maintenance of the Facility requires that Casitas will evaluate the sediment placement area on a continual basis, using both the photogrammetric aerial survey and the fill design plans in conjunction with one another, to customize fill placement plans on an annual basis. As described in the Project Description, the placement of fill under Activity 1B will be consistent with Casitas' annual fill design plans. Depending on annual storm conditions, during any given year the amount of sediment relocated to the placement area will vary. If there is sediment leftover after the desired contours and elevation of the streambed in the placement area is achieved, it will be stockpiled outside of the Ventura River in designated soil disposal areas or exported off site. Stockpiled sediment will be evaluated on an annual basis to determine whether it can be placed back into the river each year. In summary, Activity 1B would only place relocated sediment within the Ventura River channel to the extent that the planned channel contours and elevations are achieved.

The sediment removal and placement components of the R&M Program have been designed to have a beneficial effect on localized drainage patterns within the Ventura River, both upstream and downstream of the Facility, by restoring the intended capacity of the forebay through sediment removal, as well as by providing the planned contours and elevation of the downstream channel through sediment placement, consistent with extensive and ongoing study of in-channel drainage patterns associated with the Facility. Other components of the R&M Program would have no effect on drainage pattern alterations, as work would be conducted during dry periods and when there is no flow present, and all work would be conducted with the implementation of applicable BMPs for erosion and sediment control, as discussed in Section (8), *Geology and Soils,* under criterion (b).

Implementation of the R&M Program would ultimately have positive effects on localized drainage patterns within the Ventura River, by restoring and/or providing the intended and planned channel conditions. With implementation of the BMPs identified in the Project Description, Section 10 and discussed above, potential impacts associated with drainage pattern alterations during R&M Program activities, including the potential for erosion or siltation on or off site would be less than significant.

LESS THAN SIGNIFICANT IMPACT

c.(ii) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

c.(iii) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

c.(iv) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows?

As discussed above, implementation of the R&M Program would not alter the course of a stream or river and would not adversely affect the existing drainage pattern within the Ventura River or the surrounding area. Drainage pattern alterations within the Ventura River would occur in accordance with planned contours and elevation for the channel, which account for flood events, and would not cause flooding on or off the site. Implementation of the R&M Program does not include discharges to an existing or planned stormwater drainage system. In addition, as described above for criterion (a) regarding water quality, the proposed program would not introduce substantial polluted runoff. Potential impacts associated with on- or off-site flooding, runoff water, polluted runoff, and impeding or redirecting flood flows would be less than significant.

LESS THAN SIGNIFICANT IMPACT

d. In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

The Facility is in a Special Flood Hazard Area (FEMA 2010) and would be inundated during a flood event. The Facility is also subject to inundation by tsunami or seiche. All the coastal and near coastal river areas in Ventura County are susceptible to tsunamis, which are series of waves caused by an undersea disturbance such as an earthquake. Although tsunamis initiate off the coast, they can proceed up rivers for many miles if the gradient of the river is shallow (County of Ventura ~~2013~~ 2020). The effects of tsunami waves on a river system such as the Ventura River could alter the river channel and modify coastal landforms (County of Ventura ~~2013~~ 2020). Most deaths during a tsunami are a result of drowning; associated risks include flooding, polluted water supplies, and damaged gas lines (County of Ventura ~~2013~~ 2020). A seiche has similar wave-generating effects as a tsunami, except that seiches affect enclosed bodies of water such as lakes and reservoirs. There is presently no record of a major seiche event occurring in Ventura County (County of Ventura ~~2013~~ 2020). The Facility is located approximately two miles downstream of the Matilija Dam; however, the reservoir entrained by Matilija Dam is highly sedimented, and there is minimal water present such that a seiche is considered unlikely. In addition, the dam is planned for removal by the USACE, which would remove the potential for seiche to occur at this location in future.

The likelihood of either a tsunami or seiche resulting in inundation at the Facility is considered low. With respect to flood hazards associated with being located within a Special Flood Hazard Area, the R&M Program would not exacerbate existing flood hazards at the Facility, and in fact would continue operation and maintenance of the Facility such that flood conveyance capacity of the existing Facility is maintained to appropriately convey flows within the Ventura River. Program

activities would generally be completed during dry conditions, and implementation of the R&M Program would enable the Facility to operate as designed. In addition, implementation of the R&M Program would not introduce new hazards or hazardous conditions to the area and would not alter the existing potential for release of pollutants to occur as a result of inundation from a flood, tsunami, or seiche. Potential impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

e. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

As described above, Casitas manages its water supply in accordance with an UWMP that is updated every five years (Casitas ~~2016~~ 2021). Surface water and groundwater resources are addressed in the UWMP. The R&M Program would not conflict with or obstruct the implementation of a water quality control plan or sustainable groundwater management plan. No impact would occur.

NO IMPACT

11 Land Use and Planning

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	☐	☐	☐	■
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	■

a. Would the project physically divide an established community?

The project involves work within the existing Facility. The project would not include construction of new structures and would not physically divide an established community. No impact would occur.

NO IMPACT

b. Would the project 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?

The project site is in unincorporated Ventura County. The Ventura County General Plan designates the land use on the project site as Open Space (County of Ventura ~~2016~~ 2020). The project site is also zoned as Open Space (OS-80 ac) and is in the Dark Sky (DKS) Overlay Zone area and Temporary Rental Unit Regulation (TRU) Overlay Zone area. The project is generally consistent with the Ventura County General Plan, the Ojai Valley Area Plan, and the Ventura County Non-Coastal Zoning Ordinance. The project would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Accordingly, no impact would occur.

NO IMPACT

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12 Mineral Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	■
b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	■

a. Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

b. Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

The project site is in Mineral Resource Zone 3 (MRZ-3), which indicates an area containing mineral deposits, the significance of which cannot be evaluated from available data (County of Ventura ~~2019~~ 2020). No mineral resource extraction is currently occurring on site. The project site is previously developed and is not zoned for mineral extraction. In addition, the project site is not located in a Mineral Resources Protection overlay zone as designated by the County of Ventura. Therefore, no impact to mineral resources would occur.

NO IMPACT

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13 Noise

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	■	☐
b. Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	■	☐
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	■

Noise Overview

Sound is a vibratory disturbance created by a moving or vibrating source, which is capable of being detected by the hearing organs (e.g., the human ear). Noise is defined as sound that is loud, unpleasant, unexpected, or undesired and may therefore be classified as a more specific group of sounds. The effects of noise on people can include general annoyance, interference with speech communication, sleep disturbance, and, in the extreme, hearing impairment (Crocker 2007).

Noise levels are commonly measured in decibels (dB) using the A-weighted sound pressure level (dBA). The A-weighting scale is an adjustment to the actual sound pressure levels so that they are consistent with the human hearing response, which is most sensitive to frequencies around 4,000 Hertz (Hz) and less sensitive to frequencies around and below 100 Hz (Kinsler et al. 1999). Decibels are measured on a logarithmic scale that quantifies sound intensity in a manner similar to the Richter scale used to measure earthquake magnitudes. A doubling of the energy of a noise source, such as a doubling of traffic volume, would increase the noise level by 3 dB; similarly, dividing the energy in half would result in a decrease of 3 dB (Crocker 2007).

Human perception of noise has no simple correlation with acoustical energy. The perception of noise is not linear in terms of dBA or in terms of acoustical energy. Two equivalent noise sources combined do not sound twice as loud as one source. It is widely accepted that the average healthy ear can barely perceive changes of 3 dBA, increase or decrease; that a change of 5 dBA is readily

perceptible; and that an increase (decrease) of 10 dBA sounds twice (half) as loud (California Department of Transportation [Caltrans] 2013).

The impact of noise is not a function of loudness alone. The time of day when noise occurs, and the duration of the noise are also important. In addition, most noise that lasts for more than a few seconds is variable in its intensity. Consequently, a variety of noise descriptors has been developed. The noise descriptors used for this analysis are the one-hour equivalent noise level (L_{eq}) and the community noise equivalent level (CNEL).

- The L_{eq} is the level of a steady sound that, in a stated time period and at a stated location, has the same A-weighted sound energy as the time-varying sound. For example, $L_{eq(1h)}$ is the equivalent noise level over a 1-hour period, and $L_{eq(8h)}$ is the equivalent noise level over an 8-hour period. $L_{eq(1h)}$ is a common metric for limiting nuisance noise whereas $L_{eq(8h)}$ is a common metric for evaluating construction noise.
- The CNEL is a 24-hour equivalent sound level. The CNEL calculation applies an additional 5-dBA penalty to noise occurring during evening hours (i.e., 7:00 p.m. to 10:00 p.m.) and an additional 10-dBA penalty is added to noise occurring during nighttime hours (i.e., 10:00 p.m. to 7:00 a.m.). These increases for certain times are intended to account for the added sensitivity of humans to noise during the evening and night.

Sound from a small, localized source (approximating a “point” source) decreases or drops off at a rate of 6 dBA for each doubling of the distance. However, traffic is not a single, stationary point source of sound. Over some time interval, the movement of vehicles makes the source of the sound appear to emanate from a line (line source) rather than a point. The drop-off rate for a line source is 3 dBA for each doubling of distance.

Vibration Overview

While people have varying sensitivities to vibrations at different frequencies, they are generally most sensitive to low-frequency vibration. Vibration in buildings, such as from nearby construction activities, may cause windows, items on shelves, and pictures on walls to rattle. Vibration of building components can also take the form of an audible low-frequency rumbling noise, referred to as groundborne noise. Although groundborne vibration is sometimes noticeable in outdoor environments, it is almost never annoying to people who are outdoors. The primary concern from vibration is that it can be intrusive and annoying to building occupants and vibration-sensitive land uses (Federal Transit Administration [FTA] 2018).

Vibration amplitudes are usually expressed in peak particle velocity (PPV) or RMS vibration velocity. The PPV and RMS velocity are normally described in inches per second (in/sec). PPV is defined as the maximum instantaneous positive or negative peak of a vibration signal. PPV is often used in monitoring of blasting vibration because it is related to the stresses that are experienced by buildings (Caltrans 2020).

Vibration significance ranges from approximately 50 vibration decibels (VdB), which is the typical background vibration-velocity level, to 100 VdB, the general threshold where minor damage can occur in fragile buildings (FTA 2018). The general human response to different levels of groundborne vibration velocity levels is described in Table 9.

Table 9 Human Response to Different Levels of Groundborne Vibration

Vibration Velocity Level	Human Reaction
65 VdB	Approximate threshold of perception for many people
75 VdB	Approximate dividing line between barely perceptible and distinctly perceptible (many people find that transportation-related vibration at this level is unacceptable)
85 VdB	Vibration acceptable only if there are an infrequent number of events per day

Source: FTA. 2018.

Project Site Setting

The primary sources of noise in the project site vicinity are vehicular traffic on local roadways and agricultural operations. Rural and suburban residential areas generally experience lower ambient noise levels while areas in highly urbanized regions, along high-volume roadways, and near industrial development generally experience higher ambient noise levels. Quiet rural and suburban areas, like those adjacent to the project site, typically have noise levels in the range of 25 to 50 dBA (Caltrans 2013). Rice Road runs northwest-southeast near the project site and is adjacent to the project site at its northwestern terminus and approximately 1,500 feet east of the southernmost portion of the project site. As discussed in Section 17, *Transportation*, traffic volumes on Rice Road in ~~2018~~ 2015 were approximately ~~2,000~~ 2,100 vehicles per day (County of Ventura ~~2018~~ 2020a); therefore, noise levels within 80 feet of Rice Road are approximately 50 CNEL (Appendix ~~H~~ I). Typical agricultural operations on Ventura County farms that use tractors and similar mechanized equipment for cultivation and harvesting produce noise levels of approximately 75 to 85 dBA at 50 feet. In addition, water pumps produce noise levels of 50 to 65 dBA at 50 feet (County of Ventura 2013). Agricultural operations in the project site vicinity generate similar noise levels when these types of equipment are in use.

Noise exposure goals for different types of land uses reflect the varying noise sensitivities associated with those uses. The County of Ventura General Plan Noise Element defines noise-sensitive receivers as residences, schools, hospitals, nursing homes, churches, and libraries (County of Ventura 2019). Noise-sensitive receivers in the project site vicinity include residences along Oso Road approximately 100 feet east of the project site and a residence off SR 33 approximately 370 feet west of the project site.

Regulatory Setting

Ventura County General Plan

Section ~~2.16~~ 7.9 of the County of Ventura General Plan (~~2019~~ 2020b) contains the ~~County's Noise Element~~ noise section for the County's Hazards and Safety Element. The ~~Noise~~ Hazards and Safety Element identifies primary noise sources in the county, develops noise contours for existing transportation, industrial, and miscellaneous sources, and provides mitigation strategies to reduce noise impacts in the county through ~~2020~~ 2040. The ~~Noise~~ Hazards and Safety Element also contains policies related to noise exposure and emission. However, none of the policies are applicable to the proposed R&M Program because the policies are focused on ensuring noise/land use compatibility of new noise-sensitive land uses and restricting noise levels from continuous stationary noise sources such as heating, ventilation and air conditioning equipment and industrial processes.

Ventura County Code of Ordinances

Section 6299-1 of the Ventura County Code of Ordinances prohibits loud or raucous noise within any residential zone which is audible to the human ear during the hours of 9:00 p.m. to 7:00 a.m. at a distance of 50 feet from the property line of the noise source or 50 feet from any such noise source if the source is in a public right-of-way. Although the ordinance indicates "loud or raucous noise" can include operation of riding tractors or other mechanical or electrical devices or hand tools, which could be used during construction activities, Section 6299-2(a) exempts any government entity or public utility, such as Casitas, from complying with the provisions of the ordinance.

Ventura County Construction Noise Threshold Criteria and Control Plan

The County of Ventura Construction Noise Threshold Criteria and Control Plan establishes thresholds for temporary construction-generated noise at sensitive receptors. Construction noise thresholds are divided into daytime hours (7:00 a.m. to 7:00 p.m.), evening hours (7:00 p.m. to 10:00 p.m.), and nighttime hours (10:00 p.m. to 7:00 a.m.). Per the Construction Noise Threshold Criteria and Control Plan, hospitals and nursing homes are sensitive receptors at all hours, single- and multi-family residences as well as hotels/motels are sensitive receptors during evening and nighttime hours, and schools, churches and libraries are sensitive receptors during daytime and evening hours when in use. Noise threshold criteria for daytime construction apply only to receptors that are sensitive to noise impacts during the daytime (i.e., hospitals, nursing homes, schools, churches, and libraries). No daytime noise-sensitive receptors are in the vicinity of the project site.

a. Would the project result in 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?

Noise generated by activities under the R&M Program was estimated using the Federal Highway Administration Roadway Construction Noise Model version 1.1 (RCNM 2006). RCNM predicts construction noise levels for a variety of construction operations based on empirical data and the application of acoustical propagation formulas. Using RCNM, noise levels produced by R&M activities were estimated at noise-sensitive receivers near the project site. RCNM provides reference noise levels for standard heavy-duty equipment, with an attenuation of 6 dBA per doubling of distance for stationary equipment.

For noise assessment, heavy-duty equipment can be considered to operate in two modes: stationary and mobile. As a rule, stationary equipment operates in a single location for one or more days at a time, with either fixed-power operation (e.g., pumps, generators, and compressors) or variable-power operation (e.g., pile drivers, rock drills, and pavement breakers). Mobile equipment moves around the site with power applied in cyclic fashion, such as bulldozers, graders, and loaders (FTA 2018). Noise impacts from stationary equipment are assessed from the center of the equipment, while noise impacts from mobile equipment are assessed from the center of the equipment activity area (i.e., R&M Program activity site).

Variation in power imposes additional complexity in characterizing the noise source level from construction equipment. Power variation is accounted for by describing the noise at a reference distance from the equipment operating at full power and adjusting it based on the duty cycle, or percent of operational time, of the activity to determine the L_{eq} of the operation (FTA 2018).

Each R&M Program activity has a specific equipment mix, depending on the work to be accomplished during that activity. Each R&M Program activity also has its own noise characteristics; some will have higher continuous noise levels than others, and some may have high instantaneous noise levels. The maximum hourly L_{eq} of each activity is determined by combining the L_{eq} contributions from each piece of equipment used in that phase (FTA 2018).

Given the nature of R&M Program activities and site constraints, it was assumed that only three pieces of mobile heavy-duty equipment and all pieces of stationary equipment would be operating simultaneously at any given time. To provide a conservative assessment, it was assumed that the three loudest pieces of mobile equipment would be operating simultaneously for those activities that would require more than three pieces of mobile equipment. Table 10 lists the anticipated heavy-duty equipment mix for each R&M Program activity and the estimated noise level at 50 feet. For activities in which there are several options for equipment, the loudest equipment was modeled to provide a conservative estimate of noise impacts.

Table 10 Noise Levels by R&M Program Activity at 50 Feet

R&M Program Activity		Equipment	Noise Level at 50 Feet (dBA L_{eq})
1	Forebay Sediment	Grader, bulldozer, and dump truck	83
2	Fish Ladder, Screenbay, High-flow Bypass	Excavator, loader, and water pumps (2)	83
3	Rock Weir and Measurement Weir	Excavator	77
4	Entrance Pool	Bulldozer, excavator, and one dump truck	81
5	Concrete Structures	Dump truck, excavator, concrete mixer, and concrete pump	82
6A	Timber Cut-off Wall Repair and Maintenance	Excavator, dump truck, and vibratory compactor	80
6B	Debris Fence	Backhoe, light trucks (2)	77
6C	Radial Gates	Aerial lift, light trucks (2)	75
6D	Instrumentation	No heavy-duty equipment	n/a
6E	Road Maintenance	Grader	81

dBA = A-weighted decibel; L_{eq} = average equivalent noise level; n/a = not applicable

On-site Noise

Noise generated by R&M Program activities on site would be primarily associated with the use of heavy-duty off-road equipment. Casitas has not adopted thresholds for evaluating the significance of noise impacts, and none of the County of Ventura's General Plan Noise Element policies, County Code requirements, or construction noise threshold criteria are applicable to the proposed R&M Program, because the project activities would only occur during daytime hours near receivers that are not considered to be sensitive to daytime construction noise by the County of Ventura's Construction Noise Threshold Criteria and Control Plan (County of Ventura 2010). Casitas has therefore used the FTA (2018) *Transit Noise and Vibration Impact Assessment* criteria for the purposes of this analysis. The FTA provides criteria for assessing construction noise impacts based on the potential for adverse community reaction. The project's R&M activities would use heavy-duty equipment and activities (e.g., grading, concrete pouring, material movement) similar in nature to those of FTA construction activities. Therefore, the FTA threshold is appropriate to use in evaluating the project's on-site noise impacts.

For residential uses, the daytime noise threshold is 80 dBA L_{eq} for an 8-hour period (FTA 2018).

Table 11 summarizes noise levels generated by each individual R&M Program activity at the sensitive receiver nearest to the associated activity area. As shown therein, noise levels produced by individual R&M Program activities would not exceed the threshold of 80 dBA L_{eq} at the nearest sensitive receivers.

Table 11 R&M Noise Levels by Activity at Nearest Sensitive Receivers

Activity		Distance to Nearest Sensitive Receiver (feet)[1]	Noise Level at Nearest Sensitive Receiver (dBA L_{eq})	Threshold (dBA L_{eq})	Threshold Exceeded?
1	Forebay Sediment	525	63	80	No
2	Fish Ladder, Screenbay, High-flow Bypass	725	60	80	No
3	Rock Weir and Measurement Weir	450	58	80	No
4	Entrance Pool	550	60	80	No
5	Concrete Structures	675	59	80	No
6A	Timber Cut-off Wall Repair and Maintenance	525	60	80	No
6B	Debris Fence	725	54	80	No
6C	Radial Gates	670	53	80	No
6E	Road Maintenance	300	65	80	No

dBA = A-weighted decibel; L_{eq} = average hourly equivalent noise level

[1] Distance measured from the property boundary of the nearest sensitive receiver to the center of the program activity area.

Notes: Assumes a standard distance attenuation rate for point sources of 6 dBA per doubling of distance. See Appendix H for RCNM outputs.

Some activities may occur simultaneously, which would result in higher combined noise levels than for each individual activity. The "reasonable worst-case scenario" of overlapping activities would be simultaneous implementation of Activity Nos. 1 and 6E because Activity No. 1 requires use of certain heavy equipment that generates relatively high noise levels (i.e., dump truck, grader, bulldozer) and because these activities would impact the same noise-sensitive receiver (i.e., residences along Oso Road). Table 12 shows combined noise levels during simultaneous occurrence of Activity Nos. 1 and 6E, the "reasonable worst-case scenario."

Table 12 Combined R&M Noise Levels during Simultaneous Activities at Nearest Sensitive Receivers

Activity		Distance to Nearest Sensitive Receiver (feet)	Noise Level at Nearest Sensitive Receiver (dBA L_{eq})[2]	Threshold (dBA L_{eq})	Threshold Exceeded?
1	Forebay Sediment	525	63	80	No
6E	Road Maintenance	300	65	80	No
Combined Noise Level			67	80	No

[1] Distance measured from the property boundary of the nearest sensitive receiver to the center of the program activity area.

[2] See Table 11.

dBA = A-weighted decibel; L_{eq} = average hourly equivalent noise level

Note: Assumes a standard distance attenuation rate for point sources of 6 dBA per doubling of distance. See Appendix H for summed noise calculations.

Table 12 shows that the "reasonable worst-case scenario" would not exceed the threshold of 80 dBA L_{eq} at the nearest sensitive receivers. Noise generated by simultaneous occurrence of other overlapping activities would be less than that generated by Activity Nos. 1 and 6E and would also not exceed the threshold of 80 dBA L_{eq}. Therefore, on-site noise impacts would be less than significant.

Off-Site Traffic Noise

The R&M Program would add vehicle trips from worker commutes, water trucks, material deliveries, and haul trucks to local and regional roadways, which would generate increased traffic noise. The greatest volume of project-related trips would occur during Activity No. 1, which would require approximately 20 daily one-way worker trips, six daily one-way material delivery and water truck trips, and 10 to 12 daily one-way haul truck trips.[5] In total, Activity No. 1 would require approximately 36 to 38 daily one-way trips. Haul trucks would utilize North Rice Road and Fairview Road to access the project site from SR 33 and would therefore travel past several residences, which are noise-sensitive receivers. Off-site traffic noise impacts would be significant if traffic would result in a 3-dBA increase in traffic noise, which would be a barely perceptible increase for the average healthy ear (Caltrans 2013). A doubling of traffic volumes would be necessary to cause a 3-dBA increase (Crocker 2007).

Rice Road experiences daily traffic volumes of approximately ~~2,000~~ 2,100 vehicles, and Fairview Road experiences daily traffic volumes of approximately ~~900~~ 800 vehicles (County of Ventura ~~2018~~ 2020a). Therefore, the increase in daily traffic volumes of approximately 36 to 38 trips as a result of the proposed R&M Program would not double existing traffic volumes and therefore would not result in a 3-dBA increase in traffic noise levels. Therefore, off-site traffic noise impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

[5] Approximately 626 one-way haul trips would occur over the course of 60 working days, which would equate to approximately 10 to 12 one-way haul trips per day

b. Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

A quantitative assessment of potential vibration impacts from the R&M Program, such as vibratory compaction and grading, was conducted using the estimates and equations developed by Caltrans and the FTA (Caltrans 2020; FTA 2018). Table 13 shows typical vibration levels for various pieces of heavy-duty equipment used in the assessment of construction vibration (FTA 2018). These pieces of heavy-duty equipment are anticipated to be used during R&M Program activities and would generate the highest levels of vibration as compared to heavy-duty equipment not included in this analysis.

Table 13 Vibration Levels for Heavy-Duty Equipment

Equipment	PPV at 25 feet (in/sec)	Approximate L_v VdB at 25 feet
Vibratory Roller	0.210	94
Large Bulldozer	0.089	87
Small bulldozer	0.003	58
Loaded trucks	0.076	83

PPV = peak particle velocity; in/sec = inches per second; L_v = vibration velocity level; VdB = vibration decibel

Source: FTA 2018

In particular, Activity Nos. 1, 4, 5, and 6A would utilize vibration-generating equipment such as bulldozers, loaded trucks, and vibratory compactors. Neither Casitas nor the County of Ventura has adopted a significance threshold to assess vibration impacts during construction and operation. Therefore, for this analysis Casitas has determined that used the FTA guidelines set forth in the FTA *Transit Noise and Vibration Impact Assessment Manual* (2018) to evaluate potential vibration impacts related to both potential building damage and human annoyance. Based on the FTA criteria, vibration impacts would be significant if vibration levels exceed 100 VdB, which is the general threshold where damage can occur to fragile buildings, or 78 VdB at residences during daytime hours, which is the general threshold for human annoyance at this land use (FTA 2018). Table 14 summarizes estimated vibration levels at the nearest sensitive receivers.

Table 14 Vibration Levels by R&M Program Activity at Nearest Sensitive Receivers

Equipment	Activity	Distance to Nearest Sensitive Receiver (feet)[1]	Vibration Level at Nearest Sensitive Receiver (VdB)	Daytime Residential Human Annoyance Threshold (VdB)	Structural Damage Threshold (VdB)	Thresholds Exceeded?
Large bulldozer	1. Forebay Sediment	200	67	78	100	No
Small bulldozer	1. Forebay Sediment 4. Entrance Pool	200	38	78	100	No
Vibratory compactor	6A. Timber Cut-off Wall	600	64	78	100	No
Loaded trucks	1. Forebay Sediment 4. Entrance Pool 5. Concrete Structures 6A. Timber Cut-off Wall	200	63	78	100	No

VdB = vibration decibel

[1] Distance measured from the structure of the nearest sensitive receiver to the edge of the R&M Program activity area.

Note: See Appendix H for vibration calculations.

As shown above, vibration levels generated by the R&M Program would not exceed the thresholds for daytime residential human annoyance or structural damage at the nearest sensitive receivers. Therefore, impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

As discussed in Section 9, *Hazards and Hazardous Materials*, the closest public airport to the project site is the Santa Paula Airport, located approximately 15 miles southeast of the project site. The project site is not located within an airport land use plan or within two miles of a public airport or private airstrip (Ventura County Airport Land Use Commission 2000). Therefore, the project would not expose people working in the project area to excessive noise levels due to proximity to an airport. No impact would occur.

NO IMPACT

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14 Population and Housing

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?	☐	☐	☐	■
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	■

a. Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

b. Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

The R&M Program would not involve construction of new housing, would not require additional Casitas staff for operation, and would not increase available water supplies. Therefore, the project would not induce population growth directly or indirectly, nor conflict with growth projections in the area. The project would not displace any people or existing housing and would not necessitate construction of housing elsewhere. No impact to population and housing would occur.

NO IMPACT

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15 Public Services

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a.	Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the 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:				
	1 Fire protection?	☐	☐	■	☐
	2 Police protection?	☐	☐	■	☐
	3 Schools?	☐	☐	☐	■
	4 Parks?	☐	☐	☐	■
	5 Other public facilities?	☐	☐	☐	■

Public services include fire protection, police protection, schools, parks, and other public facilities and resources. The proposed program activities would occur at the existing Facility along the Ventura River.

a.1. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, or the need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

Fire protection services to the Facility site and surrounding area are provided by Ventura County Fire Department Station 22, located at 466 South La Luna Avenue in Ojai. Implementation of the proposed program would comply with Fire Code standards, including provision of adequate emergency access to the site. As discussed in Section 20, *Wildfire*, the program would not introduce or exacerbate existing wildfire risk. In addition, as discussed in Section 14, *Population and Housing*, the proposed program would not directly or indirectly induce population growth; therefore, the program would not increase the Ventura County Fire Department Station service populations.

Operation of the project would constitute a continuation of existing conditions, in that the R&M Program would continue to operate and maintain the Facility. Potential impacts associated with fire protection services would be less than significant, with no mitigation required.

LESS THAN SIGNIFICANT IMPACT

a.2. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, or the need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

Police protection services to the Facility and surrounding area are provided by the Ojai Station of the Ventura County Police Department, located at 402 South Ventura Street in Ojai. As noted above, the proposed program would neither directly nor indirectly induce population change or growth in the area. Therefore, the project would not increase the service population for the Ojai Police Station, or the Ventura County Police Department overall. Potential impacts associated with police protection services would be less than significant, with no mitigation required.

LESS THAN SIGNIFICANT IMPACT

a.3. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered schools, or the need for new or physically altered schools, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives?

a.4. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered parks, or the need for new or physically altered parks, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives?

a.5. Would the project result in substantial adverse physical impacts associated with the provision of other new or physically altered public facilities, or the need for other new or physically altered public facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

The proposed R&M Program would not directly or indirectly affect population in the area, and therefore would not affect service ratios for public services such as schools, parks, or libraries. The project also would not directly affect such public services, as all project-related activities would occur at the existing Facility. No impact would occur.

NO IMPACT

16 Recreation

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	■
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	■

a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

As discussed in Section 14, *Population and Housing*, the proposed R&M Program would not directly or indirectly support population growth. Therefore, it would not increase the use of existing neighborhood and regional parks or other recreational facilities so as to cause or accelerate a substantial physical deterioration of the facility. No impact would occur.

NO IMPACT

b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

The proposed R&M Program does not propose recreational facilities and would not require the construction or expansion of any recreational facilities. As such, no impact would occur.

NO IMPACT

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17 Transportation

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	■	☐
b. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	■	☐
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?	☐	☐	☐	■
d. Result in inadequate emergency access?	☐	☐	☐	■

a. Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Access to the Facility would be from the north end of Rice Road located east of the forebay, from the northern access road at the upper limit of the forebay, and from the south from Cooper Canyon Road. Potential transportation impacts during R&M activities would be associated primarily with the presence of worker vehicles and haul trucks; however, these potential transportation impacts would be short-term, temporary, intermittent, and limited to the unincorporated County roadways at the project site. Therefore, project construction would not substantially interfere with traffic on Rice Road or Fairview Road. No lane closures would be required for the proposed program. The proposed program would not generate bus, pedestrian, or bicycle traffic, or otherwise interfere with the operation of existing bus routes and stations, sidewalks and other pedestrian infrastructure, or bicycle lanes.

~~The County of Ventura's Initial Study Assessment Guidelines document bases the determination of the significance of traffic impacts to a road segment or intersection "Levels of Service" (LOS) on policies 4.2.2-4 and 4.2.2-5 of the Ventura County General Plan. A potentially significant adverse project-specific traffic impact is assumed to occur on any road segment: 1) if the project would cause the existing LOS on a roadway segment to fall to an unacceptable level, or 2) if the project will add one or more Peak-Hour Trip to a roadway segment that is currently operating at an unacceptable LOS (County of Ventura 2010).~~

~~Rice Road, located directly east of the Facility, is a County-maintained local road. As such, the minimum acceptable LOS is C, which is defined as: "Stable flow but with speed and maneuverability restricted by higher traffic volumes. Satisfactory operating speed for urban locations with some delays at signals." Rice Road is a Class I roadway, defined as a rural two-lane or multi-lane roads of~~

~~essentially level terrain, where the road section has been improved to meet current road standard criteria (County of Ventura 2005). This means the road segment has an average daily traffic LOS threshold of 10,000 vehicles (County of Ventura 2010). In 2018, traffic volumes on Rice Road were 2,000 vehicles per day, with an AM peak of 180 and a PM peak of 190 (County of Ventura 2017).~~

~~Anticipated vehicle trips include construction workers traveling to and from the project work areas, haul trucks (including for export of sediment, as needed), and other trucks associated with equipment and material deliveries. The traffic generated by workers would vary depending on which activity is being implemented. Any program-related traffic occurring between 7:00 a.m. and 9:00 a.m. or between 4:00 p.m. and 6:00 p.m. would coincide with peak hour traffic and could temporarily impede traffic and transit flow. Travel during these timeframes would primarily consist of workers traveling to and from the project area, because deliveries and haul trips would likely occur throughout the day. The increased traffic could result in a reduction of roadway capacities due to slower movements and larger turning radii of the trucks compared to passenger vehicles. Conservatively assuming all program-related traffic accesses the project site on Rice Road, worker and haul trips associated with project construction would temporarily increase daily traffic along this roadway by a maximum of approximately 50 vehicle trips per day. In addition, realistically, these trips would be spread across the three access routes to the project site. The County's LOS threshold would not be exceeded.~~

Traffic impacts would only occur during active R&M activities. The proposed program would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. This impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

b. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

CEQA Guidelines Section 15064.3(b) identifies criteria for evaluating transportation impacts. Specifically, the guidelines state vehicle miles traveled (VMT) exceeding an applicable threshold of significance may indicate a significant impact. According to CEQA Guidelines Section 15064.3(b)(3), a lead agency may include a qualitative analysis of operational and construction traffic. ~~Pursuant to CEQA Guidelines Section 15064.3(c), the provisions of this section do not apply statewide until July 1, 2020, although a lead agency may elect to immediately apply the provisions of the updated guidelines. Currently, official measures and significance thresholds related to VMT have not been adopted by Casitas or the County of Ventura. However, as discussed below, the project is not expected to permanently affect VMT in the study area.~~

The Governor's Office of Planning and Research *Technical Advisory on Evaluating Transportation Impacts in CEQA* (2018) states, "Projects that generate or attract fewer than 110 trips per day generally may be assumed to cause a less-than-significant VMT impact." As discussed ~~under~~ in Section 13, *Noise,* the project would generate ~~up to a maximum~~ an increase of approximately 36-38 vehicle trips per day, which falls below the recommended screening threshold of 110 trips per day. As such the impact associated with VMT would be less than significant.

LESS THAN SIGNIFICANT IMPACT

c. Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?

R&M Program activities would take place at the existing Facility and would not increase hazards on adjacent roadways due to a geometric design feature or incompatible use. The proposed program would not include alterations to existing public roadway alignments or intersections and therefore would not include sharp curves or unsafe designs that would increase traffic hazards.

On-site road maintenance and repair would occur as needed (estimated annually) on Reclamation property during dry conditions. The purpose of the road maintenance activities would be to improve the safety of the roads, which are primarily used by contractors to complete the forebay restoration project. The program would therefore have a beneficial impact related to road hazards on the project site. No adverse impact related to traffic hazards would occur.

NO IMPACT

d. Would the project result in inadequate emergency access?

Program implementation would not block public roadways or driveways. Emergency access to the Facility and surrounding land uses would not be impeded. As discussed in Section 9, *Hazards and Hazardous Materials*, and in Section 20, *Wildfire,* road maintenance that would occur under Activity 6E would be planned and of short duration, and limited to Reclamation roadways providing access to the Facility within the Ventura River; this activity would not substantially impede the implementation of emergency response or evacuation plans. Therefore, the program would not result in inadequate emergency access.

NO IMPACT

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18 Tribal Cultural Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in a Public Resources Code Section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or	☐	■	☐	☐
b. 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.	☐	■	☐	☐

PRC Section 21074 (a)(1)(A) and (B) defines tribal cultural resources as "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe" and is:

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), or
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 these criteria, the lead agency shall consider the significance of the resource to a California Native American tribe.

AB 52 also establishes a formal consultation process for California tribes regarding those resources. The consultation process must be completed before a CEQA document can be certified. Under AB 52, lead agencies are required to "begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project." Native American tribes to be included in the process are those that have requested notice of projects proposed within the jurisdiction of the lead agency.

a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code Section 21074 that is 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)?

Casitas Municipal Water District (Casitas) is the lead agency for this project and is therefore responsible for AB 52 notification. Casitas sent AB 52 consultation letters on July 2, 2020, to the following tribes: Barbareño/Ventureño Band of Mission Indians, Chumash Council of Bakersfield, Coastal Band of the Chumash Nation, Northern Chumash Tribal Council, San Luis Obispo County Chumash Council, and Santa Ynez Band of Chumash Indians. Follow-up consultation undertaken on August 19, 2020 resulted in Julie Tumamait-Stenslie, Chairperson of the Barbareño/Ventureño Band of Mission Indians, requesting Native American monitoring during project-related ground disturbance associated with Activities 1A and 1B. Mitigation Measures TCR-1, *Avoidance of Tribal Cultural Resources,* TCR-2, *Tribal Cultural Resources Treatment Plan,* and TCR-3, *Native American Monitoring,* as presented below, would be implemented for the proposed project~~, and would include Native American monitoring during project-related ground disturbing activities~~. On November 15, 2024, proposed revisions to TCR-2 and TCR-3 were discussed and reviewed with Matthew Vestuto, current Chairperson of the on Barbareño/Ventureño Band of Mission Indians.

Mitigation Measures

TCR-1 Avoidance of Tribal Cultural Resources

When feasible, project construction shall avoid tribal cultural resources.

TCR-2 Tribal Cultural Resources Treatment Plan

Prior to construction of the project, Casitas shall prepare a tribal cultural resources treatment plan. ~~to be implemented in the event an unanticipated archaeological resource that may be considered a tribal cultural resource is identified during construction, subject to review and acceptance by Casitas~~. The plan would include suspension of all earth-disturbing work in the vicinity of the find, avoidance of the resource or, if avoidance of the resource is infeasible, the plan would outline the appropriate treatment of the resource in coordination with the affiliated tribe and, if applicable, a qualified archaeologist. Examples of appropriate treatment for tribal cultural resources include, but are not limited to, protecting the cultural character and integrity of the resource, protecting traditional use of the resource, protecting the confidentiality of the resource, or heritage recovery.

TCR-3 Native American Monitoring

~~All~~ For all earth-disturbing work during Activities 1A, 1B, and 6E associated with the project, Casitas shall provide tribes the opportunity to conduct a Worker Environmental Awareness Training prior to beginning work activities, as well as opportunity for ~~shall be observed by a local~~ Native American monitoring during the work activities. Native American monitoring may be reduced to spot-checking or eliminated at the discretion of the monitors, in consultation with the lead agency, as warranted by conditions such as encountering bedrock, sediments being excavated are fill, or negative findings during the first 60 percent of rough grading. If Native American monitoring is reduced to spot-checking, spot-checking shall occur when ground-disturbance moves to a new location within the APE and when ground disturbance will extend to depths not previously reached (unless those depths are within bedrock). Sediment already monitored during removal does not require monitoring during subsequent placement unless excavation is occurring as part of that activity. In

the event of a discovery of tribal cultural resources, the steps identified in the tribal cultural resources plan prepared under measure TCR-2 shall be implemented.

Significance After Mitigation

Implementation of Mitigation Measure TCR-1 would provide that project activities would avoid tribal cultural resources to the extent feasible. Mitigation Measure TCR-2 would provide for the implementation of a project-specific tribal cultural resources treatment plan, which will designate procedures for response to an unanticipated discovery of tribal cultural resources. Mitigation Measure TCR-3 would provide for the opportunity to provide a Native American monitor during earth-disturbing work associated with proposed project Activities 1A, 1B, and 6E. With implementation of these mitigation measures, potential impacts of the project to tribal cultural resources would be less than significant.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

b. Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code 21074 that is 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?

There are no known tribal cultural resources at the project site. However, as described under impact threshold (a) above, the potential for previously undiscovered tribal cultural resources to be uncovered during ground-disturbing activities, while unlikely, cannot be completely ruled out. If such resources are found and are determined to be significant under PRC Section 5024.1, the project could result in significant impacts to such resources if they are disturbed, destroyed, or otherwise improperly treated. Therefore, previously identified mitigation measures would be implemented as directed below.

Mitigation Measures

CR-1 Archaeological Monitoring

Please see Section 5, *Cultural Resources*, impact threshold (b) for the full text of this mitigation measure.

TCR-1 Avoidance of Tribal Cultural Resources

Please see impact threshold (a) above for the full text of this mitigation measure.

Significance After Mitigation

Implementation of Mitigation Measure CR-1 would provide for archaeological monitoring during all project-related ground disturbance under Activities 1A, 1B, and 6E, with monitors having the authority to stop work in the vicinity of a find of archaeological resources, should one occur. Mitigation Measure CR-1 also allows for monitoring reduction to spot-checking, or monitoring cessation, if it is determined to be unnecessary based on site-specific work conditions. In addition, Mitigation Measure TCR-1 would provide for the avoidance of tribal cultural resources to the extent feasible. With the implementation of these measures, potential impacts associated with causing a change in the significance of a tribal cultural resource would be less than significant.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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19 Utilities and Service Systems

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☐	■
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	■	☐
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☐	■
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	■	☐
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	■	☐

a. Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

The project consists of R&M activities at the Facility in order to maintain its intended design capacity. The project would not expand the capacity of the Facility beyond its intended design. As discussed in Section 14, *Population and Housing*, the project would not directly or indirectly increase population. As such, the project would not require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities. No impact would occur.

NO IMPACT

b. Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

The project would not introduce a new demand for water supplies. Occasional water use would be required for dust suppression purposes (all program activities) and for concrete manufacturing (Activity No. 5, *Concrete Structures*); this water use would be consistent with ongoing operation and maintenance of the Facility. As such, required water supply would be provided by Casitas from existing sources, which include surface water from Lake Casitas and groundwater from Casitas' existing Mira Monte Well. Because the R&M Program would not introduce a new water demand, and water use would only be conducted on an as-needed basis depending upon the activities identified for any given year, potential impacts associated with sufficient water supplies would be less than significant. This topic is further discussed under Section 10, *Hydrology and Water Quality.*

LESS THAN SIGNIFICANT IMPACT

c. Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

The project would not generate sanitary wastewater or otherwise contribute to an increase in wastewater treatment requirements. As such, no impact would occur.

NO IMPACT

d. Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

e. Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

R&M activities would generate minimal solid waste. Removed sediment from the forebay would be used to shore up the channel banks downstream of the timber cut-off wall which have been eroded by heavy storms. It is anticipated that this sediment would be placed or stockpiled on site. However, it is possible that in some years, there may not be on-site capacity to store the removed sediment. Under this scenario, up to 25,000 cubic yards of sediment could be exported from the project site. Casitas would try to identify a receiver agency to beneficially use the excess sediment in the watershed. However, if no receiver agency is willing to take the excess sediment, it is possible the sediment could be disposed of as solid waste.

E.J. Harrison and Sons provides waste and recycling services in the city of Ojai and the surrounding unincorporated areas of Ventura County. Solid waste is directed by E.J. Harrison and Sons to the Gold Coast Recycling and Transfer Station, a privately-operated diversion and recycling station. The remaining waste is then transferred to the Toland Road Landfill, a Class III landfill operated by the Ventura Regional Sanitation District. The Toland Road Landfill is in Santa Paula, a 30-mile drive from the project site. According to the California Department of Resources Recycling and Recovery, the Toland Road Landfill has a permitted capacity of 30 million cubic yards and a maximum disposal capacity of ~~1,500~~ 2,864 tons per day. As of ~~January 2016~~ December 2018, the remaining capacity at the landfill was approximately ~~10.5~~ 16 million cubic yards. The landfill solid waste permit lists an estimated closure date of ~~2027~~ 2033. Toland Road Landfill accepts a variety of materials, including construction and demolition materials, agricultural waste, industrial waste, sludge (biosolids), and mixed municipal waste (CalRecycle ~~2020a~~ 2024a).

Waste Management, Inc. operates the Simi Valley Landfill and Recycling Center, located in the city of Simi Valley, a 50-mile drive from the project site. The Simi Valley Landfill and Recycling Center has a permitted capacity of 119,600,000 cubic yards and a maximum disposal capacity of 9,250 tons per day. As of ~~February 2017~~ January 2019, the remaining capacity was approximately ~~88.3~~ 82.9 million cubic yards. The landfill solid waste permit lists an estimated closure date of ~~2052~~ 2063. The landfill accepts a variety of materials including construction and demolition materials, industrial waste, sludge (biosolids), and mixed municipal waste (CalRecycle ~~2020b~~ 2024b).

Construction activities may temporarily generate solid waste, which would be disposed of in accordance with all applicable federal, State, and local statutes and regulations. As described above, local solid waste infrastructure has the capacity to accept solid waste generated by project construction activities. Once constructed, project operation would not generate solid waste. The project would not impair the attainment of solid waste reduction goals. Potential impacts would therefore be less than significant.

LESS THAN SIGNIFICANT IMPACT

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20 Wildfire

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	■	☐
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	■
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	■
d. Expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	■

The project site is in unincorporated Ventura County, on the Ventura River approximately two miles downstream of Matilija Dam, near the community of Ojai. This area is a designated Very High Fire Hazard Severity Zone in the State Responsibility Area (SRA) and Local Responsibility Area (LRA) (CAL FIRE ~~2007, 2010~~ 2024), particularly for open space surrounding this portion of the Ventura River. The project area has been subject to recent fires, including the 282-acre Chorro Fire in August 2015, the 2,304-acre Pine Fire, and the 281,893-acre Thomas Fire in 2017.

a. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

As discussed in Section 9, *Hazards and Hazardous Materials*, construction activities associated with the proposed R&M Program may require temporary access restrictions during implementation of Activity 6E, Road Maintenance. However, such restrictions would be limited to the Facility access roads on Reclamation land and would be planned and of short duration; program activities would not impede the implementation of an adopted emergency response plan or emergency evacuation

plan, including as related to wildfire. Traffic-related impacts of the R&M Program would primarily be associated with individual worker trips to and from the Facility; this also would not impede the implementation of an adopted emergency response plan or emergency evacuation plan. Therefore, potential impacts associated with emergency access and evacuation relative to the area's Very High Fire Hazard Severity Zone would be less than significant.

LESS THAN SIGNIFICANT IMPACT

b. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

c. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project 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?

California PRC Section 4442 mandates the use of spark arrestors, which prevent the emission of flammable debris from exhaust, on earth-moving and portable construction equipment with internal combustion engines operating on any forest-covered, brush-covered, or grass-covered land. In addition, PRC Sections 4427 and 4431 specify standards for conducting construction activities on days when a burning permit is required, and PRC Section 4428 requires construction contractors to maintain fire suppression equipment during the highest fire danger period (April 1 to December 1) when operating on or near any forest-covered, brush-covered, or grass-covered land. All R&M Program activities would occur in compliance with fire safety requirements, and program activities would therefore not introduce or exacerbate existing wildfire risk. The project would continue existing operation and maintenance activities of the Facility and not include the installation or maintenance of facilities or infrastructure that could exacerbate fire risk. No impact would occur.

NO IMPACT

d. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

As stated above, the Facility area is classified as a Very High Fire Hazard Severity Zone. The Facility is located along the Ventura River, and the proposed program would provide ongoing operation and maintenance of the Facility, which would enable restoration of the Ventura River channel to its planned contours and elevation. Implementation of the R&M Program would not alter or disturb slopes or hillsides in the area and would not expose people or structures to risks as a result of runoff, post-fire slope instability, or drainage changes.

As discussed in the Project Description, Sections 11 and 12, annual monitoring and reporting would be conducted for the R&M Program to address constantly fluctuating conditions in the river and implement the most appropriate R&M activities and BMPs during any given year. Also as described in the Project Description, Section 9.1, *Routine versus Emergency Maintenance,* emergency actions which require immediate repair to protect life and property are covered under emergency state and federal authorizations on a case-by-case basis and are not part of the project assessed herein. If the Facility receives a heavy deposit of sediment and debris resulting from post-fire slope instability that

was not anticipated as part of a given year's R&M Program activities, and that requires immediate attention to protect life and property, such response may be covered under an emergency authorization rather than as part of regular R&M Program activities. This is consistent with ongoing operation and maintenance of the Facility. No impact would occur.

NO IMPACT

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21 Mandatory Findings of Significance

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Does the project:				
a. Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	■	☐
b. Have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☐	■	☐
c. Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	■	☐

a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Potential impacts to biological resources are addressed in Section 4, *Biological Resources*. As described therein, implementation of the R&M Program would include the use of multiple project specific BMPs that are identified in the Project Description, Section 10 and discussed throughout the impact analysis as applicable. The specific R&M Program activities and associated BMPs that would occur during any given year would be identified by Casitas and submitted to regulatory agencies for review and approval prior to activity implementation. Although potential temporary impacts may occur as a result of site disturbance during R&M Program activities, such impacts would be less than

significant with the implementation of the BMPs discussed in Section 4, *Biological Resources*. In addition, continued implementation of the R&M Program would ultimately benefit fish habitat by providing the planned operational capacity of the Facility. Accordingly, the project would not substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or substantially reduce or restrict the range of a rare or endangered plant or animal.

As further discussed in Section 5, *Cultural Resources*, no archaeological resources have been identified in the project area and the R&M Program would result in a less than significant impact to nearby built-environment resources. As such, the program would not eliminate important examples of the major periods of California history or prehistory. This impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Cumulative impacts are defined as two or more individual project effects which, when considered together or in concert with other projects, combine to result in a significant impact within an identified geographic area. In order for a project to contribute to cumulative impacts, it must result in some level of impact on a project-specific level. As described in the impact analyses provided in Sections 1 through 20 of this IS-MND, a number of the environmental topic areas would experience "No Impact" as a result of the R&M Program; in other words, none of the significance criteria identified for these environmental topic areas would result in impacts. These environmental topics include the following: Agricultura and Forestry Resources; Energy; Land Use and Planning; Mineral Resources; Population and Housing; Recreation; and Tribal Cultural Resources. These topic areas are not addressed further for cumulative impacts, because they would have no impact and therefore would not contribute to the cumulative scenario for cumulative impacts.

The following analysis of cumulative impacts addresses those effects for which some level of potential impact was identified, which includes topics for which a "Less than Significant Impact" was identified, as well as those for which the threshold question assumed some level of impact (i.e., those for which consideration of a potential "significant" effect was considered, per *CEQA Guidelines* Section 15382; in this case, threshold questions which assumed impacts would be "Less than Significant with Mitigation Incorporated"). Potential regional cumulative effects were considered for the environmental topics which would result in less than significant impacts from implementation of the R&M Program (without or with project mitigation).

- **Aesthetics:** Temporary aesthetic impacts associated with the presence and use of equipment and machinery at and around the Facility would occur during implementation of the R&M Program, particularly the sediment placement included under Activity No. 1B, which would include hauling sediment from the forebay to the downstream placement area, which may be visible to land uses immediately east of the Ventura River. These effects would be temporary in duration, and specific to the project site. Therefore, no contribution to a cumulative impact would occur.
- **Air Quality:** Air pollutant and GHG emissions disperse from their original source and can affect the entire air basin (or, with global warming, potentially the entire Earth). For air quality, the baseline analysis addresses the cumulative condition, or the project's contribution to the larger

picture which is assessed in analyses of consistency with regional air quality strategies and pollutant dispersal. Air pollutant emissions associated with the R&M Program correlate with the equipment and machinery used during implementation of Activity Nos. 1 through 6, as well as the traffic generated by these activities. Based on the air quality and GHG emissions modeling completed for analysis of the R&M Program, mitigation measures were developed to reduce R&M Program emissions to levels below applicable emissions thresholds. In this scenario, the region is in non-attainment for criteria pollutant standards for ozone and PM_{10}, which means that cumulative air quality impacts are inherently significant. However, VCAPCD's significance thresholds are intended to determine whether a project would individually or cumulatively jeopardize attainment of the federal standards. Mitigation measures for the R&M Program reduce emissions to below the VCAPCD thresholds. Therefore, air quality impacts of the R&M Program would not individually jeopardize attainment of the federal standards. Therefore, the project's contribution to cumulative impacts would not be considerable.

- **Biological Resources**: As described in Section 4, *Biological Resources*, the R&M Program could result in temporary impacts to biological resources associated with disturbance to habitat on and around the Facility. Implementation of BMPs that are included in the R&M Program, as listed in the Project Description, Section 10 and discussed throughout the analysis of biological resources provided in Section 4, would reduce biological resources impacts to less-than-significant levels. Other projects in the region would also be required to comply with federal, State, regional, and local regulations and laws put in place to minimize impacts to biological resources. Therefore, cumulative impacts would be less than significant.
- **Cultural Resources:** Ground-disturbing activities during project construction could potentially result in the accidental discovery of unknown archaeological resources. However, due to the disturbed nature of the Ventura River where the Facility is located and the R&M Program would occur, the project, in combination with other projects in the area, would not result in significant cumulative impacts to archaeological resources. In addition, the project would not result in a substantial adverse change to a built environment resource listed or eligible for listing in the NRHP or the CRHR. Therefore, no contribution to cumulative impacts, significant or otherwise, would occur.
- **Geology and Soils:** Impacts associated with geology and soils, including paleontological resources, are inherently restricted to the location of the project activities. Mitigation measures are identified in Section 7, *Geology and Soils*, and include the implementation of a worker awareness program for paleontological resources, as well as specified procedures for handling the unanticipated discovery of paleontological resources, as applicable. Due to the site-specific nature of impacts and the implementation of appropriate mitigation, the R&M Program would not contribute to cumulative impacts associated with other future developments.
- **GHG Emissions:** Refer to the discussion within the *Air Quality* bullet above.
- **Hazards and Hazardous Materials:** Regarding hazards and hazardous materials, no regional concern is identified (i.e., no significant cumulative impact). In the event the project would result in accidental discharge associated with transport, use, storage, and/or disposal of hazardous materials during construction or operation of the project, prescribed activities to be conducted in accordance with the NPDES Construction General Permit and BMPs provided in the Project Description, Section 10 would reduce potential impacts associated with the discharge of contaminants to a less-than-significant level. The project would also comply with applicable federal, State, and local laws and regulations regarding hazardous materials. Therefore, no contribution to cumulative impacts, significant or otherwise, would occur.

- **Hydrology and Water Quality:** Potential water quality impacts associated with the R&M Program would generally be limited to short-term construction-related erosion/sedimentation, as the program would not result in an appreciable increase in impervious surface area or substantial alteration of drainage patterns. Implementation of BMPs, as part of project conformance with NPDES permit conditions, would effectively eliminate the potential for drainage- and water quality-related impacts. Therefore, no contribution to cumulative impacts would occur.
- **Noise:** The Facility site is within a rural residential area. Noise impacts are inherently restricted to the project area and would not contribute to cumulative impacts associated with other future developments. Furthermore, given the rural residential environment of the Facility site and attenuation of noise, future development would not be anticipated to occur close enough to the immediate vicinity of the Facility to result in cumulative noise impacts. No contribution to a cumulative impact would occur.
- **Public Services:** Any potential impacts to public services would be associated with temporary demand for police or fire protection services during project construction. As concluded in Section 15, *Public Services*, such impacts would be less than significant. The project would not induce population growth and thereby would not, directly or indirectly, contribute to cumulative impacts to public services.
- **Transportation:** The project would result in a temporary increase in traffic associated with the implementation of R&M Program activities, which are comparable to existing conditions. No substantial long-term transportation impacts would occur as a result of the R&M Program. Given the temporary nature of construction-related traffic impacts and the fact the R&M Program would not generate a substantial amount of operational traffic, the contribution to cumulative transportation impact would not be cumulatively considerable.
- **Utilities and Service Systems:** The project would not induce population growth and therefore would not, directly or indirectly, contribute to cumulative impacts to utilities and service systems.
- **Wildfire:** As described in Section 20, *Wildfire*, potential wildfire impacts associated with the project would be limited to short-term construction-related impacts to emergency response, which would be less than significant. The R&M Program would not result in long-term wildfire impacts. Given there would be no long-term operational wildfire impacts and the short-term nature of any construction-related wildfire impacts, the program's contribution to any cumulative impact would not be considerable.

For these reasons, the project would not result in a considerable contribution to any cumulative effects significant or otherwise.

LESS THAN SIGNIFICANT IMPACT

c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

In general, impacts to human beings are associated with air quality, hazards and hazardous materials, and noise impacts. As detailed under Section 3, *Air Quality*, three mitigation measures have been developed for implementation with the R&M Program, to minimize emissions associated with the use of vehicles and equipment during the identified activities. These mitigation measures include AQ-1, *Tier 4 Equipment,* AQ-2, *Increased Dump Truck Capacity,* and AQ-3, *Haul Trip Timing*.

With the implementation of these mitigation measures, as needed, the R&M Program would not result in significant impacts from air quality or greenhouse gas emissions. In addition, as detailed under Section 13, *Noise,* and Section 9, *Hazards and Hazardous Materials,* potential impacts of the R&M Program to these environmental topic areas would be less than significant with the implementation of BMPs included as part of the R&M Program, as listed in the Project Description, Section 10 and discussed throughout the impact analyses as applicable.

As summarized above, the R&M Program would not result in significant impacts associated with air quality, hazards and hazardous materials, and noise; therefore, impacts to human beings would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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Appendix J

Responses to Comments on the Draft IS-MND

Robles Diversion and Fish Passage Facility Annual Maintenance and Repair Program

Responses to Comments on the Draft MND

Final Initial Study – Mitigated Negative Declaration

prepared by

Casitas Municipal Water District
1055 North Ventura Avenue
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Contact: Kelley A. Dyer, P.E.
Assistant General Manager

prepared with the assistance of

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October 2024

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Responses to Comments on the Draft MND

This section includes comments received during the circulation of the Draft Mitigated Negative Declaration (MND) prepared for the Robles Diversion and Fish Passage Facility Annual Maintenance and Repair Program (proposed project).

The Draft MND was circulated for a 30-day public review period which began on October 24, 2021 and ended on November 24, 2021. Casitas Municipal Water District (District or Casitas) received three comment letters on the Draft MND within the comment period. An additional letter from the California Department of Fish and Wildlife (CDFW) was received after the comment period ended. While this letter was not received within the 30-day public review period, CDFW requested an extension for its review and responses to CDFW comments are provided.

The four comment letters received on the Draft IS-MND are identified below, along with the number of the first page within this Responses to Comments document upon which the respective set of comments is addressed.

Letter No.	Commenter (Name, Title, Agency, Division)	Page No.
1	Nicole Collazo, Air Quality Specialist Ventura County Air Pollution Control District, Planning Division	xx
2	Dave Ward, Planning Director Ventura County Resource Management Agency, Planning Division	xx
3	Peter Sheydayi, Deputy Director County of Ventura Public Works Agency, Watershed Planning and Permits Division	xx
4	Erinn Wilson-Olgin, Environmental Program Manager California Department of Fish and Wildlife, South Coast Region	xx

The comment letters and responses follow. The comment letters have been numbered sequentially and each separate issue raised by the commenter, if more than one, has been assigned a number. The responses to each comment identify first the number of the comment letter, and then the number assigned to each issue (Response 1.1, for example, indicates the response is for the first issue raised in Letter No. 1).

Since the end of the public review period, there have been minor changes to the project description and Draft IS-MND, some in response to the comments received. As described in the *Introduction* Section of the Final IS-MND, these changes merely clarify and/or amplify existing information within the IS-MND and do not require recirculation of the IS-MND. Changes made in response to the comments on the Draft IS-MND are shown in <u>underline</u> for text additions and ~~strikethrough~~ for text deletions.

Letter 1

Ventura County Air Pollution Control District
4567 Telephone Rd
Ventura, California 93003
tel 805/303-4005
fax 805/456-7797
www.vcapcd.org
Dr. Laki Tisopulos, P.E.
Air Pollution Control Officer

VENTURA COUNTY
AIR POLLUTION CONTROL DISTRICT
Memorandum

TO: Kelley Dyer, Assistant General Manager

DATE: November 23, 2021

FROM: Nicole Collazo, Air Quality Specialist, Planning Division

SUBJECT: Public Comment for the Robles Diversion and Fish Passage Facility Annual Maintenance and Repair Program MND (RMA 21-022)

Air Pollution Control District (APCD) staff have reviewed the subject Notice of Intent (NOI) and draft Mitigated Negative Declaration (MND) for the project referenced above. The project is for the continued maintenance and repair of the existing Robles Diversion and Fish Passage facility, which include sediment/debris removal, vegetation control, repair/maintenance of radial and other gates, instrumentation and road maintenance. The Lead Agency for the project is the Casitas Municipal Water District. APCD as a Commenting Agency has the following comments about the draft MND as it pertains to air quality and/or greenhouse gas environmental impact sections. 1-1

GENERAL COMMENTS

Air Quality Section

Item 1, Page 26. BMP-13 -14 and -17, having to do with potential release of fugitive dust and particulate matter, should include some language on using water trucks as an option to control concrete particulates into the atmosphere. 1-2

Item 2, Page 47. The MND states that the project will be in compliance with APCD Rule 55 by ensuring "construction emissions would not be generated in such quantities as to cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or endanger the comfort, repose, health, or safety of any such person or the public (underline added)". The underline portion is language from our APCD Rule 51, Nuisance, which is a complaint-driven rule. As such, Rule 55 would not have compliance ensured from a complaint-driven rule if it there is no nexus for enforcement to occur. We recommend installing a sign with the APCD 24-hr Complaint Hotline phone number, 805-303-3700, in a viewable location for any member of the public who wishes to log a dust complaint, especially the residences living approximately 100 feet away from the project site. This may be added as a dust control measure in the Fugitive Dust Emissions portion of the MND and/or added to the BMP list in Section 10, and as a condition of approval of the discretionary permit issued to the Lead Agency for the project. 1-3

Thank you for the opportunity to comment on the project's MND. You may reach me at nicole@vcapcd.,org should you have any questions.

Letter 1

COMMENTER: Nicole Collazo, Planning Division, Ventura County Air Pollution Control District

DATE: November 23, 2021

Response 1-1

This comment is introductory and summarizes the project. This comment does not pertain to the analysis within the Draft IS-MND. No response is required.

Response 1-2

The commenter requests that Best Management Practice (BMP)-13, BMP-14, and BMP-17 be revised to include language on using water trucks as an option to control the release of concrete particulates into the atmosphere.

The language of neither BMP-13 nor BMP-17 was modified in response to this comment, because these BMPs do not address the type of issue (release of particulate matter into the atmosphere) that would be minimized or avoided through the application of water on the ground surface; specifically, BMP-13 is directed at preventing a spill or leak of materials from contaminating the Ventura River in stormwater runoff, and BMP-17 is directed at preventing concrete washout to the Ventura River during the execution of Activity 5. However, BMP-14 is related to controlling the release of loose materials, which would be minimized through the application of water via water trucks, and applies to all six project activities. Therefore, BMP-14 is the appropriate measure to revise in response to this comment.

In response to this comment, as shown in the Errata to the Draft IS-MND, BMP-14, *Tracking Loose Material (Activities 1-6)*, has been revised as follows:

> BMPs such as street sweeping, vacuuming, and rumble plates will be implemented to prevent the off-site tracking of loose construction and landscape materials, as appropriate. <u>In addition, fugitive dust control measures, such as periodic watering via water trucks, will be implemented as appropriate to minimize the release of particulates into the air.</u>

Response 1-3

The commenter states that the statement in Section 3, *Air Quality*, of the Draft IS-MND regarding compliance with VCAPCD Rule 55 is not correct because VCAPCD Rule 51 (Nuisance) would not ensure project compliance with VCAPCD Rule 55 (Fugitive Dust Control), and the commenter recommends installation of a sign with the VCAPCD 24-hour Complaint Hotline phone number in a viewable location for any member of the public who wishes to log a dust complaint.

To clarify, the project would be required to comply with the VCAPCD Rules independently of each other, and the cited statement addresses the threshold of significance recommended by VCAPCD in its Ventura County Air Quality Assessment Guidelines (2003) for assessing fugitive dust impacts; the 2003 Guidelines states (page 3-5 of the VCAPCD Guidelines):

> A project that may be reasonably expected to generate fugitive dust emissions in such quantities as to cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which may endanger the comfort, repose, health, or

safety of any such person or the public, or which may cause, or have a natural tendency to cause, injury or damage to business or property (see California Health and Safety Code, Division 26, §41700) will have a significant adverse air quality impact.

Section 6.2 of the 2003 VCAPCD Guidelines, which provides guidance on assessing project-specific, localized, non-ozone impacts, states that the VCAPCD "recommends minimizing fugitive dust, especially during grading and excavation operations, rather than quantifying fugitive dust emissions. Therefore, the mitigation measures described in Section 7.4.1, 'Fugitive Dust Mitigation Measures,' should be applied to all project-related dust-generating operations and activities" (VCAPCD 2003). The fugitive dust control measures listed in Section 7.4.1 of the 2003 VCAPCD Guidelines are functionally equivalent to VCAPCD Rule 55, which was adopted in 2008; these measures include: securing tarps over truck loads, removing vehicle track-out using PM_{10} efficient sweepers, and watering bulk material. As a result, based on the 2003 VCAPCD Guidelines, it is reasonable to conclude that compliance with VCAPCD Rule 55 would mean that the project would not generate fugitive dust emissions in such quantities as to cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which may endanger the comfort, repose, health, or safety of any such person or the public, or which may cause, or have a natural tendency to cause, injury or damage to business or property. Therefore, the suggested language regarding posting signage has not been incorporated; however, BMP-14 has been revised to require the use of fugitive dust control measures including watering via water trucks.

Letter 2

COUNTY of VENTURA

RESOURCE MANAGEMENT AGENCY
DAVE WARD, AICP
Planning Director

November 24, 2021

Casitas Municipal Water District
1055 North Ventura Avenue
Oak View, CA 93022

SUBJECT: Response to Draft Initial Study and Notice of Intent to Adopt a Mitigated Negative Declaration for the Robles Diversion and Fish Passage Facility Annual Maintenance and Repair Program
Case No. Casitas MND (RMA #21-022)
Assessor's Parcel Number 11-02-7002

Dear Assistant General Manager Kelley Dyer,

Thank you for providing the Ventura County Planning Division with the opportunity to provide comments regarding the Casitas Municipal Water District's (Casitas) notice of intent to adopt a Mitigated Negative Declaration for the Robles Diversion and Fish Passage Facility Annual Maintenance and Repair Program. The existing facility allows a portion of the Ventura River to be diverted to Lake Casitas and includes a fish ladder for upstream and downstream travel of fish. Casitas is seeking regulatory permits for a period of 10 years or more to conduct annual maintenance activities. Previously, Casitas was seeking maintenance activities on an as needed basis. The proposed project covers the maintenance and repair of the existing diversion facility including sediment and brush removal, road maintenance, vegetation control, concrete work, replacement of wood timbers, and debris fencing. Project activity will occur 2 miles downstream of Matilija dam in an unincorporated area of Ojai.

Analysis:

The Planning Division submits the following comments regarding Air Quality and Biological Resources sections in the Mitigated Negative Declaration.

1. **Truck trips and Criteria Air Pollutants**

Annually, there will be approximately 626 round trips for trucks carrying sediment offsite throughout the 60-day work period duration from the project site to the Simi Valley Landfill and Recycling Center. These vehicles would be using North Rice Road and Fairview Road as an access route to reach the diversion facility from SR 33. However, the analysis did not identify the complete truck routes that would be taken, through which cities, and which unincorporated areas. Please identify the truck trip route(s) and share them with the County of Ventura and affected cities. 2-1

Since the truck trips will originate in Ojai, and the diversion facility is located in an Air Quality Attainment Basin regulated by the Ojai Valley Clean Air Ordinance (see attached maps), the Section 3 Air Quality analysis should determine, given the portions of truck trip routes that are located within the boundary of Clean Air Ordinance, whether the threshold for NOx 2-2

HALL OF ADMINISTRATION #1740
805-654-2481 • FAX 805-654-2509 • 800 South Victoria Avenue, Ventura, CA 93009 • vcrma.org

would be exceeded. The Ojai Valley Area Plan[1] includes a section on the Adverse Impacts on Regional Air Quality (OV-55.1) and states that the County shall find discretionary development in the Ojai Valley to have a significant adverse impact on the regional air quality if daily emissions would be greater than 5 pounds per day of Reactive Organic Compounds (ROC) and/or greater than 5 pounds per day of Nitrogen Oxides (NOx). Based on the Ojai Valley Area Plan (OV-55.1) Casitas should evaluate the daily NOx emissions from round-trip truck trips, also known as truck loads, for the portion of trips that are in the areas under the Ojai Valley Clean Air Ordinance jurisdiction. Based on the analysis the permits should identify a maximum number of daily truck trips allowed, and those trips should be limited to off-peak traffic hours (OV-Program R). 2-2

Planning Division staff also noted that the description for Activity 1, removal of forebay sediment, included 626 round trip truck trips, but the mitigation measure for Checklist Item 3b, number AQ-2 for Increased Truck Capacity, incudes 478 one-way trips. The analysis should consistently use round trips or else it should describe how using larger trucks eliminates the need for round trips. 2-3

Furthermore, truck trip lengths, and associated air pollutants, would be reduced if Casitas could partner with a local agency to deposit the sediment on or near the coast. The County supports using sediment from flood control projects for beach nourishment. For example, General Plan policy PFS-6.7, Flood Control and Beach Sand Nourishment, states the County shall include beach sand nourishment as an important factor in the design and maintenance of flood control facilities. As opposed to taking sediment to the landfill, it could be used to restore a portion of the sediment supply to the beaches, which is the natural geomorphic process for the Ventura River. Methods to restore sediment transport to the coast and for deposition of appropriate sediments on beaches should be included in Best Management Practices (BMPs). Regional agencies such as BEACON are often working with local jurisdictions, including for funding opportunities, on beach nourishment projects. We encourage Casitas to engage with BEACON and the County about this opportunity. 2-4

2. Locally Important Species

The Ventura County General Plan Goal COS-1 and Policy COS-1.1 identify Locally Important Species as significant biological resources to be protected from incompatible land uses and development. Within the Biological Resource section of the Environmental Checklist, the statement is made that Locally Important Species are not expected to be within the project area. After reviewing the biological assessment conducted for the project area (Appendix A – Biological Assessment), additional information is needed to determine that there is no potential of locally important species occurring on the site.

Planning Division staff recommend that the Locally Important Species list available on our website https://vcrma.org/ventura-county-locally-important-species-list be reviewed for their potential presence on the project site and included within a table in the revised CEQA document. For example, the threespine stickleback (*Gasterosteus aculeatus microcephalus*) has been documented within San Antonio Creek and above the Matilija Dam. The potential for Prickly Sculpin (*Cottus asper*) and the Pacific Lamprey (*Lampetra tridentata*) also have the potential to be present within the Ventura watershed. In addition, the Matilija 2-5

[1] The Ojai Valley Area Plan can be accessed here:
11E. Ojai Valley Area Plan (vcrma.org)

Shoulderband Snail (*Helminthoglypta willeti*) and California glossy snake (*Arizona elegans occidentalis*) also have the potential to be present. After a thorough re-review of the Locally Important Species list, if the potential exists for any listed species listed occur, then either additional field surveys should be conducted to document their presence, or the appropriate mitigation measures should be included to reduce the potential project impacts to less than significant. 2-5

Planning Division staff also recommends that the BMPs are updated to address the presence of any locally important species that have the potential to occur on the site, particularly regarding maintenance and repairs of the fish ladder. In addition, we recommend that the District consider the following modifications to the proposed BMPs:

BMP-1: Provide a fishery monitor if a repair is necessary when water is still present and a pump is in use, to ensure smaller special status species of fish are not adversely impacted by the repair activity.

BMP-2: Include descriptions of potential Locally Important Species that have the potential to occur for the Worker Environmental Awareness Program.

BMPs-3, 4, and 5: Pre-construction surveys should include other special status species that have the potential to occur on the site. For example, snakes or other special status reptiles.

BMP- 7: Cover Excavations. Excavations should be covered that would trap other special status species in addition to the California Reg Legged Frog. 2-6

BMP- 8: Please correct the nesting bird season to reflect that the nesting bird season for Ventura County runs January 1st through September 15th due to the presence of species such as hummingbirds, hawks, and doves which are all protected by the Migratory Bird Treaty Act and Fish and Game Code.[2]

BMP-13: Material Storage. Because of the location of the site within the wildlife corridor, site materials should be stored in a manner where wildlife cannot become injured or killed (e.g., construction debris such as fencing or netting that can entrap snakes or other wildlife).

BMP-18: Site Materials and Refuse Management. All trash should be picked up and disposed of properly within the project area each day during the construction period. Plastics, wrappers, water bottles, construction debris, etc. have the potential to be carried off site by wind or rain long before the end of the project. California condors have also been observed to feed on micro-trash.

And finally, the County encourages two additional BMPs for the District to consider: 1) erosion control netting should be wildlife safe, and 2) include specifications for the protection of the presence of special status species and animal movement within the 2-7

[2] Please see Protection of Nesting Birds Public Information here:
https://docs.vcrma.org/images/pdf/planning/bio/VC_Protection_of_Nesting_Birds_2020.pdf

corridor if night work must be conducted (See Ventura County General Plan Conservation and Open Space Element COS-1).[3] 2-7

Thank you for the opportunity to comment on the NOI to Adopt a Mitigated Negative Declaration for the Robles Diversion and Fish Passage Facility Annual Maintenance and Repair Program. Please keep the County and local jurisdictions updated with any changes in maintenance plans that may occur in the future. 2-8

While project maintenance activities are unlikely to require a permit from the Planning Division, Planning staff would like to meet with Casitas Municipal Water District staff and/or its representatives to confirm this direction. The Public Works Agency, Watershed Protection District may also be interested in attending this meeting. 2-9

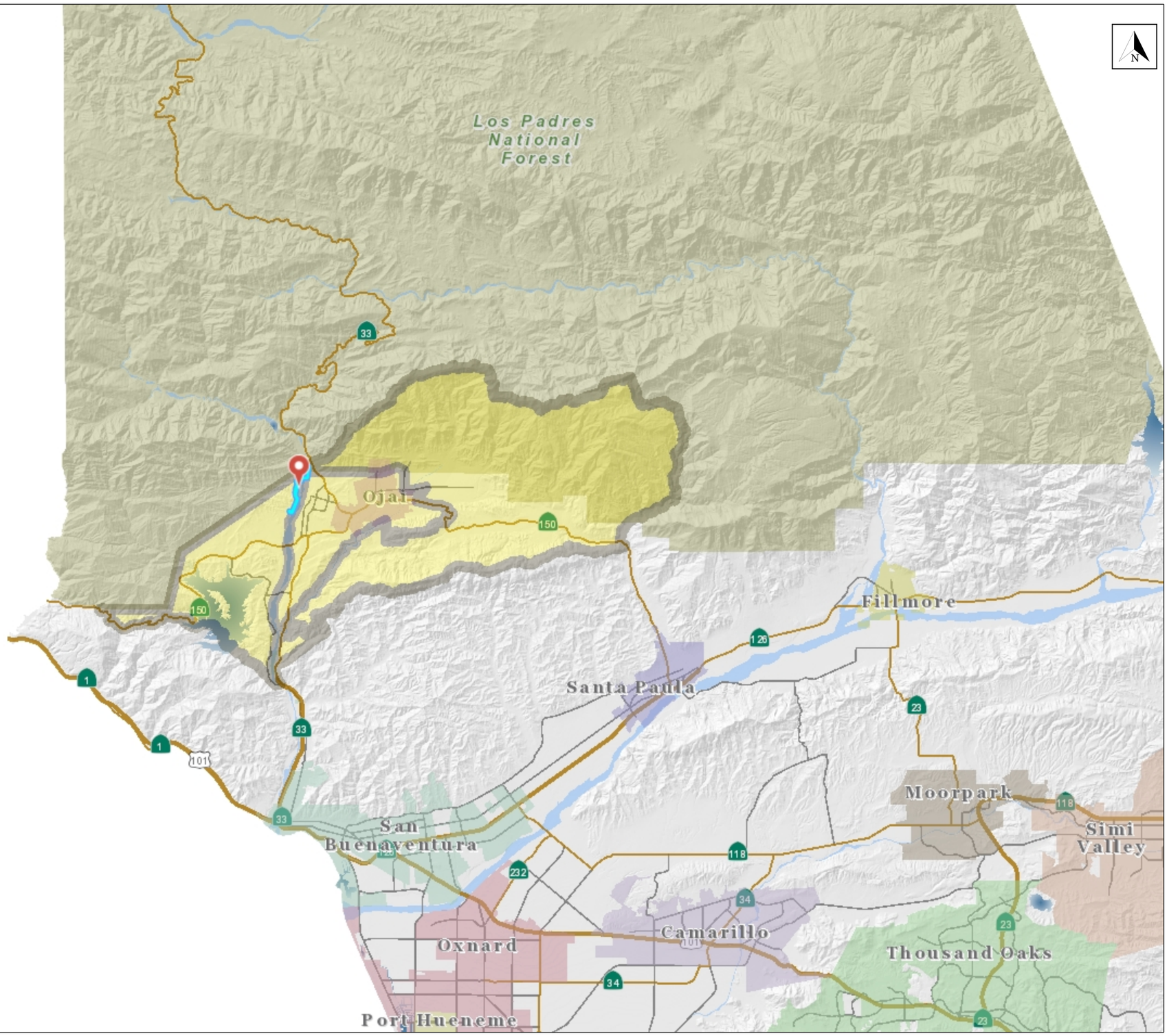
For any questions about the air pollution discussion in this letter, please contact Aaron Engstrom at 805.654.2936 or Aaron.Engstrom@ventura.org. For any questions about the biological resources discussion in this letter, please contact Abigail Convery, at 805.654.2489 or via email at Abigail.Convery@ventura.org.

Sincerely,

Aaron Engstrom for;

Dave Ward, AICP I Planning Director
County of Ventura, Planning Division

[3]Please see the General Plan Conservation and Open Space element here: https://docs.vcrma.org/images/pdf/planning/plans/Final_2040_General_Plan_docs/VCGPU_06_COS_Element_2020_09_15_web.pdf



RMA GIS

Legend

- Ojai Clean Air Ordinance
- City Boundary
  - Camarillo
  - Fillmore
  - Moorpark
  - Ojai
  - Oxnard
  - Port Hueneme
  - San Buenaventura
  - Santa Paula
  - Simi Valley
  - Thousand Oaks

0 24,074.61 48,149.2 Feet

1: 288,895

Notes

RMA GIS

Legend

- Ojai Clean Air Ordinance
- Parcels
- City Boundary
  - Camarillo
  - Fillmore
  - Moorpark
  - Ojai
  - Oxnard
  - Port Hueneme
  - San Buenaventura
  - Santa Paula
  - Simi Valley
  - Thousand Oaks

0 1,504.66 3,009.3 Feet

1: 18,056

Notes

Letter 2

COMMENTER: Dave Ward, Ventura County, Planning Division, Resource Management Agency

DATE: November 24, 2021

Response 2-1

The commenter requests identification of the truck routes that would be taken for hauling sediment off-site as part of Activity No. 1 and requests that the truck trip routes be shared with the County of Ventura and affected cities.

Casitas' normal and preferred method for the disposal of sediment removed from the forebay is to either deposit it in the Ventura River, using designated sediment placement areas, or deposit it in on-site stockpiles, using designated soil disposal areas. As such, under normal operational conditions, Casitas would dispose of 100 percent of the removed forebay sediment without requiring any truck trips from the site. However, there are certain natural events which result in high-sediment conditions, such as during post-fire conditions when sediment load in the river increases substantially due to hydrophobic conditions on the hillsides surrounding the channel. During such high-sediment conditions, more sediment than usual accumulates in the forebay, and the space available for in-channel placement or on-site stockpiling becomes limited. As a result, it may be necessary to export a portion of the excess sediment for off-site disposal; prior to using trucks to haul sediment off-site, all feasible in-channel and on-site areas would be maximized, thereby minimizing the quantity of haul trips required.

When the use of trucks to haul sediment off-site is unavoidable, haul trucks would use one of the access routes identified below, from the project site; note, of the four access routes identified below, the preferred routes are those on the east side of the river, as Cooper Canyon Road on the west can be difficult to traverse with larger sized trucks.

- East side of the river:
    - North Rice Road to Fairview Road to State Route (SR) 33 to U.S. 101 to SR 23 to SR 118 to Madera Road to Viewline Drive, or
    - North Rice Road to Fairview Road to SR 33 to U.S. 101 to SR 126 to SR 118 to Madera Road to Viewline Drive
- West side of the Ventura River:
    - Cooper Canyon Road to Ranch Road to SR 150 to SR 33 to U.S. 101 to SR 23 to SR 118 to Madera Road to Viewline Drive
    - Cooper Canyon Road to Ranch Road to SR 150 to SR 33 to SR 126 to SR 118 to Madera Road to Viewline Drive

These haul routes pass through unincorporated Ventura County as well as the cities of Ojai, Ventura, Oxnard, Camarillo, Thousand Oaks, Moorpark, and Simi Valley. The Notice of Intent to Adopt an IS-MND was sent directly to the County of Ventura and the City of Ojai at the start of the public review period for the Draft IS-MND, which identified that haul trips would occur between the project site and the Simi Valley Landfill and Recycling Center. Haul truck trips through Oxnard, Camarillo, Thousand Oaks, Moorpark, and Simi Valley would occur on established truck routes, which would primarily consist of highways operated and maintained by the California Department of Transportation; therefore, specific notification of these cities is not necessary.

Response 2-2

The commenter requests that the air quality analysis determine whether the project's emissions would exceed the threshold of five pounds per day of nitrogen oxides (NO_X) established for the Ojai Valley Plan Area. The commenter suggests that the project permits should identify a maximum number of daily truck trips allowed and that truck trips should be limited to off-peak hours.

Section 3, *Air Quality*, of the Draft IS-MND, includes Table 5, *Reasonable Worst-Cast Emissions – Unmitigated*, which compared the project's NO_x emissions generated within the Ojai Valley Plan Area to the threshold of five pounds per day, and emissions were found to exceed this threshold. As a result, Mitigation Measures AQ-1, AQ-2, and AQ-3 would be required for the proposed project. Mitigation Measure AQ-2 specifically requires the use of larger haul trucks to reduce the number of daily truck trips, which is consistent with the commenter's suggestion. Table 6, *Reasonable Worst-Cast Emissions – Mitigated*, shows that implementation of these mitigation measures would reduce NO_X emissions in the Ojai Valley Plan Area to below the threshold of significance of five pounds per day. Limiting haul truck trips to off-peak hours is not necessary to mitigate this impact because Mitigation Measures AQ-1, AQ-2, and AQ-3 are sufficient to mitigate the impact to a less-than-significant level.

Response 2-3

The commenter requests that the analysis in the Draft IS-MND consistently characterize the estimated truck trips in terms of roundtrips.

In response to this comment, as shown in the Errata to the Draft IS-MND, Section 3, *Air Quality*, of the Draft IS-MND has been revised to correct the typo related to roundtrips, as shown below.

> **Haul trips.** It was assumed up to 5,000 cubic yards of soil would be disposed of at the Simi Valley Landfill and Recycling Center. Assuming haul trucks have a capacity of 16 cubic yards, approximately 626 ~~round-trip~~ one-way truck trips would be required throughout the 60-day duration of Activity No. 1. For the purposes of modeling, these haul trips were split into two phases. One phase accounts for the geographic portion of the haul trips occurring within the boundaries of the Ojai Valley Planning Area, totaling approximately ten miles. The second phase accounts for the geographic portion of the haul trips occurring outside the Ojai Valley Planning Area, totaling 40 miles.

This revision corrections a typo and does not change the air quality modeling or analysis, which relies on the assumption of 626 one-way truck trips (5,000 cubic yards divided by 16 cubic yards = 313 roundtrips, which is equivalent to 626 one-way trips). Correcting this typo to express haul truck trips in terms of one-way trips brings this excerpt of Section 3, *Air Quality*, of the Draft IS-MND into consistency with the rest of the document, including the remainder of Section 3, *Air Quality*, as well as Section 13, *Noise*, in which haul truck trips are expressed in terms of one-way trips. It is noted that expressing haul truck trips in terms of one-way trips does not mean that the need for roundtrips is eliminated. Rather, expressing haul truck trips in terms of one-way trips is simply a different metric conveying the same overall number of haul truck trips (each roundtrip includes two one-way trips).

Response 2-4

The commenter notes haul truck trip lengths and their associated air pollutant emissions would be reduced if Casitas partnered with a local agency to deposit the sediment on or near the coast and expresses County support for using sediment from flood control projects for beach nourishment. The commenter requests the inclusion of methods to restore sediment transport to the coast and for the deposition of appropriate sediments on beaches to be included in the project's BMPs. The County encourages Casitas to engage with BEACON and the County to further discuss this opportunity.

As described for Activity 1A under *Description of Maintenance and Repair Program*, Casitas would remove varying quantities of sediment/debris from the forebay annually, ranging from no removal in some years to approximately 56,500 cubic yards in other years when storm load deposition is high. Then, as described for Activity 1B under *Description of Maintenance and Repair Program*, Casitas would utilize the removed sediment to restore storm-eroded areas within 1,100 linear feet downstream of the timber cut-off wall, which would be consistent with the County's goal of maintaining sediment transport to the coast via the Ventura River. However, before initiating sediment removal actions, Casitas would evaluate conditions of the sediment placement area at the end of the storm season (April/May) to determine how much sediment can be placed there. If the amount of sediment to be excavated exceeds the capacity of the placement area, the excess sediment that cannot be placed downstream would be stockpiled above the ordinary high-water mark of the Ventura River in designated soil disposal areas (see Figure 2 of the Draft IS-MND) or exported off-site. If sediment is stockpiled in designated disposal areas on site, Casitas would evaluate whether stockpiled sediment can be placed back into the river each year, pending capacity established in the survey of the deposition area. Therefore, soil would be exported off-site only under limited circumstances when placement of the sediment downstream of the timber cut-off wall, which would maintain sediment transport via the Ventura River, or stockpiling on-site for placement in the river in future years is not practicable. Nevertheless, Casitas decision makers will consider the County's recommendation to utilize the excess sediment that cannot be replaced downstream of the timber cutoff wall for beach nourishment as they review the project.

Response 2-5

The commenter states additional information is needed to determine there is no potential of Locally Important Species occurring on the site and recommends the Locally Important Species list be reviewed. The commenter lists several species believed to have the potential to occur in the watershed. The commenter requests for any listed species with a potential to occur, then either additional field surveys should be conducted to document their presence, or the appropriate mitigation measures should be included to reduce the potential project impacts to less-than-significant.

As described on Page 38 of the Biological Resources Assessment (Appendix A of the Draft IS-MND), the list of Locally Important Species was part of the literature review, and the species listed were considered during the assessment. Although some aquatic species on the County's list have potential to occur in the Biological Study Area (BSA), project activities would involve a minimal footprint and would be conducted during dry conditions and these species would not be affected.

Response 2-6

The commenter recommends the BMPs are updated to address the presence of any locally important species that have the potential to occur on the site. Specifically, the commenter recommends modifications to BMPs 1 through 5, 7, 8, 13, and 18. As described below, the measures have been retained because they are adequate and effective as originally presented.

The commenter recommends providing a fishery monitor for repair work be included in BMP-1. The language of BMP-1 was not modified in response to this comment because BMP-9 stipulates a qualified biological monitor (with all of the required collection permits) will be on-site during all project operations involving removal of the first 12 inches of soil/substrate, water diversions, de-watering, exposed (excavated) work areas, and work within sensitive habitat areas where sensitive species may be present.

The commenter recommends including a description of potential Locally Important Species in the Worker Environmental Awareness Program (BMP-2). This comment has been noted, but language of BMP-2 does not require modification as locally important species are considered sensitive species which are already described in the BMP.

The commenter recommends BMP-3, -4, and -5 reference other special-status species which should be surveyed for. The language of these BMP does not require modification in response to this comment because BMP-3 stipulates a qualified biologist will conduct a survey within the project area locations and document existing conditions and search for special status species. Therefore, any pre-construction survey would be inclusive of all special-status species, not just those listed in the BMP.

The commenter recommends modifying BMP-7 to clarify covers for excavations should be provided for all special-status species, not just California red-legged frog (CRLF). The language of BMP-7 was not modified in response to this comment because the intent of the measure is not only to prevent entrapment of CRLF, but all species capable of becoming entrapped in such manner. Thus, per BMP-7 any steep-walled excavation left open overnight which may trap wildlife shall be covered.

The commenter recommends modifying BMP-13 to initiate the nesting bird season on January 1 instead of February 1, to account for certain bird species in the area. The comment has been noted and the information is appreciated. The language of BMP-8 was not modified in response to this comment because BMP-3 requires pre-construction surveys within a week of project activities. The pre-construction survey is not limited to just special-status wildlife. Should maintenance activities occur between January 1 and February 1, any birds nesting in the area would be observed and avoided through compliance with BMP-3. In addition, the project would comply with pre-construction survey conditions as required by the Regulatory Agencies, including CDFW, United States Fish and Wildlife Service (USFWS), and the Ventura County Watershed Protection District (VCWPD).

The commenter recommends modifying BMP-13 to state materials should be stored in a manner where wildlife cannot become injured or killed. The language of BMP-13 was not modified in response to this comment because BMP-2 (Environmental Training) requires crew members to review measures required to avoid and minimize impacts to biological resources within the work area, which includes appropriate staging of materials (e.g., fencing, tarping) to prevent wildlife entanglement. The comment has been noted and the information is appreciated.

The commenter recommends modifying BMP-18 to include all trash and construction materials, not just food-related trash. The language of BMP-18 was not modified in response to this comment because BMP-2, Environmental Training (Activities 1-6), BMP-11 (Pollutant Management), BMP-12 (Pollution Prevention), and BMP-14 (Tracking Loose Material) describe measures to control trash and construction-related debris.

Response 2-7

The commenter recommends two additional BMPs be included: 1) erosion control netting should be wildlife safe, and 2) include specifications for the protection of the presence of special status species and animal movement within the corridor if night work must be conducted. The comment has been noted and the information is appreciated; however, BMP-2 (Environmental Training), BMP-9 (Biological Monitoring), and BMP-22 (Speed Limits) serve to address these concerns.

First, BMP-2 states the Environmental Training include identification of sensitive species and habitats, a description of the regulatory status and general ecological characteristics of sensitive resources, and review of the limits of construction and measures required to avoid and minimize impacts to biological resources within the work area.

With respect to night work, per BMP-2, night work will be avoided to the maximum extent possible; however, if night work must occur, the speed limit for transport and spreading material shall be reduced to 10 miles per hour. In addition, BMP-9 requires a qualified biological monitor be on-site during all work within sensitive habitat areas where sensitive species may be present.

Response 2-8 and 2-9

The commenter requests the County and local jurisdictions be updated with any changes in maintenance plans that may occur in the future. The comment has been noted. The County and other local jurisdictions are listed as recipients of the maintenance plan and any updates to the plan. A comment letter from Watershed Protection was received and responses to that letter are provided under Letter 3.

Letter 3

PUBLIC WORKS
VENTURA COUNTY

WATERSHED PROTECTION

WATERSHED PLANNING AND PERMITS DIVISION
800 South Victoria Avenue, Ventura, California 93009
Peter Sheydayi, Deputy Director – (805) 650-4077

M E M O R A N D U M

DATE: November 18, 2021

TO: Anthony Ciuffetelli, RMA Planner
County of Ventura

FROM: Peter Sheydayi, Deputy Director, Watershed Planning and Permits PS

SUBJECT: RMA21-022 Robles Diversion and Fish Passage Facility
Watershed Protection (WP) District Project Number: WC2021-0075

Pursuant to your request dated October 21, 2021, this office has reviewed the submitted materials and provides the following comments. 3-1

PROJECT LOCATION:

The Robles Facility is located on the Ventura River near the City of Ojai, two miles downstream of Matilija Dam in unincorporated Ventura County, CA

PROJECT DESCRIPTION:

The proposed project is for the continued maintenance and repair of the existing Robles Facility. Typical maintenance activities include sediment/debris removal; vegetation control; repair and maintenance of the radial gates (at the entrance to the headworks and spillway) and other facility control gates; instrumentation; and road maintenance. Repair activities also include concrete work within the existing footprint of the Facility and replacement of wood timbers (timber cut-off wall and debris fence). The Facility maintenance and repair activities occur in and around the Ventura River where such activities are regulated by several state and federal agencies. The modification to the bed, bank, and/or vegetation in a natural drainage is regulated by the California Department of Fish and Wildlife (CDFW) under Section 1600 *et seq*. of the Fish and Game Code. Activities that result in the discharge of dredged or fill material in watercourses are also regulated by the United States Army Corps of Engineers (USACE) under Section 404 of the Clean Water Act. Issuance of a 404 permit also requires a 401 Water Quality Certification by the Los Angeles Regional Water Quality Control Board (RWQCB). Maintenance and repair activities conform to those described in the existing Biological Opinion (BO) issued to CMWD by the National Marine Fisheries Service (NMFS) in 2003 for affects to steelhead trout (0. mykiss) from the construction and operation of the Facility. In addition, the United States Fish and Wildlife Service (USFWS) issued a BO to Casitas in October 2019 for the Robles Diversion Forebay Restoration Project and its effects on

California red-legged frog (Rana draytonii). Maintenance and repair activities conform to those described in the USFWS BO. In 2003, CMWD acquired agreements and permits from CDFW, USACE, Los Angeles RWQCB, and USFWS for construction of the Robles Diversion Fish Passage Facility; however, the permits issued did not cover maintenance of the Facility, and CMWD acquires agreements and permits on an as-needed basis for individual maintenance activities to the Facility. With the proposed project, CMWD is seeking permits with a duration of 10 years or more to include all regulated activities, include a streamlined administrative approval process, and to provide predictability and certainty on environmental protection measures.

WATERSHED PROTECTION COMMENTS:

1. The environmental checklist, Section 4 (e) states that, "*The Robles Diversion and Fish Passage Facility is owned by Reclamation and is exempt from Ordinance WP-2*." This statement is incorrect. Ventura County Ordinance WP-2 Article 2, Section 203 (b) provides exceptions "*to work performed by organizational components of the Federal government, the State of California, the County, the District, or their contractors,"* however this does not apply in this instance. Casitas Municipal Water District is the operator of the facility and will conduct and/or contract, and oversee the maintenance and repair activities, therefore is subject to the requirements listed in Article 2, Section 202. 3-2

2. Please include Ventura County Public Works Agency - Watershed Protection (VCPWA-WP) as a recipient of the annual maintenance and repair plan in Section 11, *Annual Monitoring and Reporting Program*. 3-3

3. The proposed work will require a watercourse permit and additional information on the permitting process can be found at the following website: https://www.onestoppermits.vcrma.org/departments/watercourse-encroachment 3-4

If you have any questions, please feel free to contact me by email at Peter.Sheydayi@ventura.org or by phone at (805) 650-4077.

END OF TEXT

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Letter 3

COMMENTER: Peter Sheydayi, Deputy Director, Watershed Planning and Permits Division, County of Ventura Public Works Agency

DATE: November 18, 2021

Response 3-1

The commenter states Ventura County Watershed Protection District (VCWPD) reviewed the CEQA document for the project. The comment has been noted and the information is appreciated.

Response 3-2

The commenter states that the description of the Robles Diversion on page 63 of the IS-MND as it relates to exemption from Ventura County Ordinance WP-2 is incorrect. The commenter provides a description of Ordinance WP-2, stating that "Section 203 (b) provides exceptions 'to work performed by organizational components of the Federal government, the State of California, the County, the District, or their contractors,' however this does not apply in this instance." The commenter states because the District will conduct and/or contract, and oversee the maintenance and repair activities, therefore the District is subject to the requirements listed in Article 2, Section 202. In response to this comment, the District is a contractor under the Federal Government (i.e., contracted under the Bureau of Reclamation to oversee and operation of the facility). Further, the District is a State Agency under the Municipal Water District Act of 1911. Thus, the District is exempt from Ventura County Ordinance WP-2 pursuant to Section 203(b).

Response 3-3

The commenter requests VCWPD be added as a recipient of the annual maintenance and repair plan as described in Section 11, Annual Monitoring and Reporting Program.

In response to this comment, the following revisions have been made to page 28 of the Draft IS-MND, as shown in the Errata to the Draft IS-MND:

> Using the information from Casitas staff (and a qualified biologist, if necessary), the annual maintenance and repair plan will be completed. A list of work planned for the Facility will be submitted to the USACE, CDFW, RWQCB, USFWS, NMFS, VCWPD, and Reclamation at that time.
>
> At the end of the year, an annual report documenting all work performed and the successful use of the BMPs will be submitted to USACE, CDFW, RWQCB, USFWS, NMFS, VCWPD, and Reclamation for their records.

As shown in the errata above, Watershed Protection is represented using the abbreviation "VCWPD"; this stands for "Ventura County Watershed Protection District," which is the terminology used throughout the Draft IS-MND.

Response 3-4

The commenter states the proposed work will require a watercourse permit from VCWPD and provides a website with additional information. This information is appreciated. All required permits for the proposed work will be acquired prior to start of construction activities.

State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
3883 Ruffin Road
San Diego, CA 92123
(858) 467-4201

Letter 4

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director

December 8, 2021

Mrs. Kelley Dyer
Casitas Municipal Water District
71055 North Ventura Avenue
Oak View, California 93022
KDyer@casitaswater.com

Subject: Robles Diversion and Fish Passage Facility Annual Maintenance and Repair Program, Draft Mitigated Negative Declaration, SCH# 2021100456, Ventura County

Dear Mrs. Dyer:

The California Department of Fish and Wildlife (CDFW) has reviewed the Casitas Municipal Water District's (District; Lead Agency) Draft Mitigated Negative Declaration (MND) for the Robles Diversion and Fish Passage Facility Annual Maintenance and Repair Program (Project).

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

4-1

CDFW's Role

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State [Fish & Game Code, §§ 711.7, subdivision (a) & 1802; Public Resources Code, § 21070; California Environmental Quality Act (CEQA) Guidelines, [§ 15386, subdivision (a)]. CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect state fish and wildlife resources.

CDFW is also submitting comments as a Responsible Agency under CEQA (Public Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code, including lake and streambed alteration regulatory authority (Fish & Game Code, § 1600 *et seq.*). Likewise, to the extent implementation of the Project as proposed may result in "take", as defined by State law, of any species protected under the California Endangered Species Act (CESA) (Fish & Game Code, § 2050 *et seq.*), or CESA-listed rare plant pursuant to the Native Plant Protection Act (NPPA; Fish & Game Code, §1900 *et seq.*), CDFW recommends the Project proponent obtain appropriate authorization under the Fish and Game Code.

Project Description and Summary

Objective: Casitas Municipal Water District (Casitas) operates the Robles Diversion and Fish Passage Facility (Facility), which includes the dam, forebay, and fish passage components (fish ladder, fish screen, high and low flow fish exit channels, a spillway energy dissipater, and a series of low-head stone weirs). The Facility diverts Ventura River flows into the Robles Canal, which transports the water to Lake Casitas for storage/municipal use. The fish passage components of the Facility provide upstream passage of adult Southern California steelhead (*Oncorhynchus mykiss*; steelhead) and downstream passage of juvenile steelheads.

Project activities include sediment removal, vegetation control, repair and maintenance of the radial gates (at the entrance to the headworks and spillway), instrumentation, and road maintenance. Repair activities may also include concrete work within the existing footprint of the Facility and replacement of wood timbers to maintain the structural integrity of the timber cut-off wall and debris fence.

Location: The Facility is located on the Ventura River, two miles downstream of Matilija Dam and 14.5 miles upstream of the Pacific Ocean, in unincorporated Ventura County, California (34.464820°N, -119.291107°W). The project is in the Matilija U.S. Geological Survey (USGS) 7.5-minute topographic quadrangle.

Comments and Recommendations

CDFW offers the comments and recommendations below to assist the District in adequately identifying, avoiding, and/or mitigating the Project's significant, or potentially significant, direct, and indirect impacts on fish and wildlife (biological) resources. CDFW recommends the measures below be included in a science-based monitoring program that contains adaptive management strategies as part of the Project's CEQA mitigation, monitoring, and reporting program (Public Resources Code, § 21081.6; CEQA Guidelines, § 15097) (see Attachment A). 4-2

Comment #1: Impacts to Aquatic and Riparian Resources; Lake and Streambed Alteration Agreement (LSAA)

Issue #1: Project activities, subject to Fish and Game Code, section 1600 *et. seq*., are expected to occur within the Ventura River.

Issue #2: CDFW is concerned flows may be insufficient for native fish [e.g., steelhead, arroyo chub (*Gila orcutti*), and partially-armored threespine stickleback (*Gasterosteus aculeatus macrocephalus*)] volitional passage up and down stream (see Fish and Game Code, § 5901). 4-3

Issue #3: CDFW is concerned flows may be insufficient to keep native fish that may be planted or exist below the diversion in good condition (see Fish and Game Code, § 5937). 4-4

Issue #4: CDFW is concerned that biological resources (potentially including groundwater dependent ecosystems) may be impacted by the proposed Project. 4-5

Issue #5: CDFW is concerned the hardened crossing below the diversion impedes upstream migration of southern California steelhead. 4-6

Specific Impact: The Project proposes to modify the Ventura River and its flow regime. Modification of the Ventura River may result in the loss of streams and associated watershed function and biological diversity. Frequent sediment management activities on or near streams is likely to diminish on site and downstream water quality. Project activities may also alter natural hydrologic and geomorphic processes of the Ventura River.

Why Impact Would Occur: The Project will impact the hydromorphological processes, soils, and associated vegetation of the Ventura River. These actions may also result in changes to the streams, altering hydrologic, and geomorphic processes, which may impact plant and wildlife species. 4-7

Evidence Impact Would Be Significant: The Project may substantially adversely affect the existing stream, which absent specific mitigation, could result in substantial impacts to fish and wildlife. Debris, soil, silt, oil or other petroleum products, or any other substances which could be hazardous or deleterious to aquatic life, wildlife, or riparian habitat resulting from Project related activities may enter the stream.

Recommended potentially feasible mitigation measure(s):

Mitigation Measure #1: The Project applicant (or "entity") must provide written notification to CDFW pursuant to section 1600 *et seq.* of the Fish and Game Code. Based on this notification and other information, CDFW shall determine whether a Lake and Streambed Alteration (LSA) Agreement is required prior to conducting the proposed activities. A notification package for a LSA may be obtained by accessing CDFW's web site at https://www.wildlife.ca.gov/conservation/lsa. 4-8

CDFW's issuance of an LSA Agreement for a Project that is subject to CEQA will require CEQA compliance actions by CDFW as a Responsible Agency. As a Responsible Agency, CDFW may consider the CEQA document of the Lead Agency for the Project. To minimize additional requirements by CDFW pursuant to section 1600 *et seq.* and/or under CEQA, the CEQA document should fully identify the potential impacts to streams or riparian resources and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the LSA Agreement.

Mitigation Measure #2: Any LSA Agreement issued for the Project by CDFW may include additional measures protective of the stream and fish and wildlife at the Project site and downstream of the Project. To compensate for any on-site and off-site impacts to riparian resources, additional mitigation conditioned in any LSA Agreement may include the following: avoidance of resources, on-site or off-site creation, enhancement, or restoration, and/or protection and management of mitigation lands in perpetuity. 4-9

Mitigation Measure #3: CDFW recommends fully avoiding impacts to streams, riparian, and wetland vegetation communities. If feasible, CDFW recommends redesigning the Project to avoid impacts to the existing drainage features that support sensitive vegetation communities. Design alternatives should attempt to retain as much surface flow and natural hydrologic processes as possible. 4-10

Mitigation Measure #4: If impacts to riparian habitat, such as arroyo willow thicket, mulefat thicket, and cattail marshes cannot be avoided, CDFW suggests mitigation should be achieved entirely on site. CDFW recommends that an on-site Habitat Mitigation and Monitoring Plan (HMMP) be developed. An HMMP should provide specific, detailed, and enforceable measures. 4-11

Mitigation Measure #5: CDFW recommends fish passage improvement downstream of the diversion include the removal of the hardened crossing and replaced with a permanent fish passage improvement project providing uninterrupted fish passage for migrating steelhead. 4-12

Recommendation #1: CDFW recommends the District provide an in-stream flows analysis (including measurements of inflows to inform operations of the fishway) and an evaluation of potential impacts on biological resources as part of the final environmental document. At a minimum, the analysis should provide the following:

Changes to Hydrology and Hydraulics

- CDFW recommends the District define the extent of upstream and downstream reach of the Ventura River that may be directly and indirectly affected by the proposed Project and assess potential Project-related impacts on biological resources within this study reach (including any potential groundwater dependent ecosystems).
- An analysis of potential Project-related changes to river hydraulics in both concrete and soft-bottom reaches. This includes water depth (percent change), wetted perimeter (acres gained/lost), and velocity (percent change). Comparing total wetted area may be useful in quantifying the effects on groundwater dependent ecosystems, assuming that infiltration rates are proportional to wetted area. 4-13
- CDFW recommends using a 2-D hydraulic model of proposed versus existing habitat to determine whether habitat changes are expected.
- A map of potential changes to channel hydraulics overlain on a map of plant communities and habitat for sensitive wildlife species and birds.
- A discussion of Project-related impacts on biological resources in relation to changes in hydrology throughout the reach.
- CDFW recommends using Normalized Difference Vegetation Index (NDVI).
- Normalized Difference Moisture Index (NDMI) to assess habitat health for the reach on an annual basis.
- Previous and continuous monitoring of flows at the Facility to inform operations of the fishway.

Recommendation #2: CDFW met with the District on November 15, 2021, to discuss the *Instream Flow Evaluation: Southern California Steelhead Passage Through the Intermittent Reach of the Ventura River, Ventura County* report. CDFW recommend the District continue to collaborate with the necessary resource agencies (including CDFW) to ensure adequate flows for biological resources. These discussions should address monitoring of flows to the Facility, incorporating flow recommendations into the in-stream flows analysis for the intermittent reach of the Ventura River (see Fish and Game Code §§ 3901 – 3938). 4-14

Comment #2: Impacts to Least Bell's Vireo 4-15

Issue: The District is proposing to perform Project activities in the Ventura River outside of the nesting bird season. CDFW agrees with this approach. However, Project activities, such as vegetation crushing/clearing, may result in the destruction of least Bell's vireo nests and known historic nesting habitat. A search of the California Natural Diversity Database (CNDDB) indicates Least Bell's vireo are known to occur within the vicinity of the proposed Project (CDFWa). Least Bell's vireo are known to have high site fidelity (Salata 1983b).

Specific impact: Project construction and related activities may result in the destruction of nesting habitat, which may result in temporal or permanent loss of bird nesting habitat.

Why impacts would occur: The Project as proposed would clear/trim vegetation that could provide bird nesting habitat (e.g., ground cover and shrubs). The temporal or permanent loss of vegetation may substantially impact birds that could return to the Project site year after year (Figueira et al. 2020; Haas 1998). Site fidelity exhibited across the avian taxa reflects the benefits associated with previous knowledge of a particular location, likely improving territory acquisition, foraging efficiency, potential breeding partners, and predator avoidance (Figueira et al. 2020). Least Bell's vireo exhibit especially high rates of site fidelity, with many birds not only returning to the same territory but placing nests in the same shrub used the previous year (Salata 1983b). 4-15

Evidence impacts would be significant: Nests of all birds and raptors are protected under State laws and regulations, including Fish and Game Code, sections 3503 and 3503.5. Take or possession of migratory nongame birds designated in the Federal Migratory Bird Treaty Act of 1918 (Code of Federal Regulations, Title 50, § 10.13) is prohibited under Fish and Game Code section 3513. The loss of occupied habitat or reductions in the number of sensitive and special status bird species, either directly or indirectly through nest abandonment or reproductive suppression, would constitute a significant impact absent appropriate mitigation.

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #1: Impacts to known historic least Bell's vireo nesting habitat should be avoided. 4-16

Recommendation #1: Take under the federal Endangered Species Act (ESA) is more broadly defined than CESA; take under ESA also includes significant habitat modification or degradation that could result in death or injury to a listed species by interfering with essential behavioral patterns such as breeding, foraging, or nesting. 4-17

Comment #3: Impacts to Species of Special Concern (SSC)

Issue: CDFW is concerned that Project-related activities may result in significant impacts to ESA-listed red-legged frog (*Rana draytonii*) and western pond turtle (*Emys marmorata*). Both species are listed as an SSC. 4-18

Specific impact: Project construction and related activities, directly or through habitat modification, may result in direct injury or mortality of SSC.

Why impact would occur: Project implementation includes grading, potential vegetation clearing, and other activities that may result in direct mortality, population declines, or local extirpation of pond turtle.

Evidence impact would be significant: An SSC is a species, subspecies, or distinct population of an animal native to California that currently satisfies one or more of the following (not necessarily mutually exclusive) criteria:

- Is extirpated from the State or, in the case of birds, is extirpated in its primary season or breeding role;
- Is listed as ESA-, but not CESA-listed, meets the State definition of threatened or endangered but has not formally been listed;
- Is experiencing, or formerly experienced, serious (noncyclical) population declines or range retractions (not reversed) that, if continued or resumed, could qualify it for State threatened or endangered status; and,
- Has naturally small populations exhibiting high susceptibility to risk from any factor(s), that if realized, could lead to declines that would qualify it for CESA status (CDFW 2020c).

4-18

Project construction and activities, directly or through habitat modification, may result in direct mortality, reduced reproductive capacity, population declines, or local extirpation of SSC. CEQA provides protection not only for CESA- and ESA-listed species, but for any species including but not limited to SSC which can be shown to meet the criteria for CESA-listing. These SSC meet the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines, § 15065). Take of SSC could require a mandatory finding of significance by the District, (CEQA Guidelines, § 15065).

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #1: Pursuant to the California Code of Regulations, title 14, section 650, the District/qualified biologist must obtain appropriate handling permits to capture, temporarily possess, and relocate wildlife to avoid harm or mortality in connection with Project construction and activities. Please visit CDFW's Scientific Collection Permits webpage (https://wildlife.ca.gov/Licensing/Scientific-Collecting) for information (CDFW 2020d). An LSA may provide similar take or possession of species as described in the conditions of the agreement.

4-19

CDFW has the authority to issue permits for the take or possession of wildlife, including mammals; birds, nests, and eggs; reptiles, amphibians, fish, plants; and invertebrates (Fish & Game Code, §§ 1002, 1002.5, 1003). Effective October 1, 2018, a Scientific Collecting Permit is required to monitor project impacts on wildlife resources, as required by environmental documents, permits, or other legal authorizations; and, to capture, temporarily possess, and relocate wildlife to avoid harm or mortality in connection with otherwise lawful activities (Cal. Code Regs., tit. 14, § 650).

Mitigation Measure #2: The District should retain a qualified biologist(s) with experience surveying for and familiarity with the life history of each of the species mentioned above. The qualified biologist should conduct focused surveys for SSC and suitable habitat no more than one month from the start of any ground-disturbing activities or vegetation removal where there may be impacts to SSC. In addition, the qualified biologist should conduct daily biological monitoring during any activities involving vegetation clearing or modification of natural habitat. Positive detections of SSC and suitable habitat at the detection location should be mapped and photographed. The qualified biologist should provide a summary report of SSC surveys to the District prior to implementing any Project-related ground-disturbing activities and vegetation removal. Depending on the survey results, a qualified biologist should develop species-specific mitigation measures for implementation during the Project. 4-20

Mitigation Measure #3: Wildlife should be protected, allowed to move away on its own (non-invasive, passive relocation), or relocated to adjacent appropriate habitat on site or to suitable habitat adjacent to the project area. SSC should be captured only by a qualified biologist with proper handling permits. The qualified biologist should prepare a species-specific list (or plan) of proper handling and relocation protocols and a map of suitable and safe relocation areas. A relocation plan should be submitted to the District prior to implementing any Project-related ground-disturbing activities and vegetation removal. 4-21

Mitigation Measure #4: The District, in consultation with a qualified biologist, should prepare a worker environmental awareness training. The qualified biologist should communicate to workers that upon encounter with an SSC (e.g., during construction or equipment inspections), work must stop, a qualified biologist must be notified, and work may only resume once a qualified biologist has determined that it is safe to do so. 4-22

Mitigation Measure #5: If any SSC are harmed during relocation or a dead or injured animal is found, work in the immediate area should stop immediately, the qualified biologist should be notified, and dead or injured wildlife documented. A formal report should be sent to CDFW and the District within three calendar days of the incident or finding. Work in the immediate area may only resume once the proper notifications have been made and additional mitigation measures have been identified to prevent additional injury or death. 4-23

Comment #4: Impacts to Non-Game Mammals and Wildlife

Issue: Wildlife may still move through the Project site during the daytime or nighttime. CDFW is concerned that any wildlife potentially moving through or seeking temporary refuge on the Project site may be directly impacted during Project activities and construction.

Specific impacts: Project activities and construction equipment may directly impact wildlife and birds moving through or seeking temporary refuge on site. This could result in wildlife and bird mortality. Furthermore, depending on the final fencing design, the Project may cumulatively restrict wildlife movement opportunity. 4-24

Why impacts would occur: Direct impacts to wildlife may occur from: ground disturbing activities (e.g., staging, access, excavation, grading); wildlife being trapped or entangled in construction materials and erection of restrictive fencing; and wildlife could be trampled by heavy equipment operating in the Project site.

Evidence impact would be significant: Mammals occurring naturally in California are considered non-game mammals and are afforded protection by State law from take and/or harassment (Fish & Game Code, § 4150; Cal. Code of Regs, § 251.1).

4-24

Recommended Potentially Feasible Mitigation Measure(s): CDFW recommends the following four mitigation measures to avoid and minimize direct impacts to wildlife during Project construction and activities.

Mitigation Measure #1: If fencing is proposed for use during construction or during the life of the Project, fences shall be constructed with materials that are not harmful to wildlife. Prohibited materials include, but are not limited to, spikes, glass, razor, or barbed wire. Fencing shall also be minimized so as not to restrict free wildlife movement through habitat areas.

4-25

Mitigation Measure #2: To avoid direct mortality, a qualified biological monitor shall be on site prior to and during ground and habitat disturbing activities to move out of harm's way special status species or other wildlife of low mobility that would be injured or killed by grubbing or Project-related construction activities. Salvaged wildlife of low mobility shall be removed and placed onto adjacent and suitable (i.e., species appropriate) habitat out of harm's way.

It should be noted that the temporary relocation of on-site wildlife does not constitute effective mitigation for the purposes of offsetting Program impacts associated with habitat loss.

4-26

Mitigation Measure #3: Grubbing and grading shall be done to avoid islands of habitat where wildlife may take refuge and later be killed by heavy equipment. Grubbing and grading shall be done from the center of the Project site, working outward towards adjacent habitat off site where wildlife may safely escape.

4-27

Additional Recommendations

Alternatives. CDFW recommends the District consider an alternative that would fully avoid or minimize impacts to streams, sensitive plants and wildlife. CDFW recommends the District recirculate the environmental document after including alternative locations in order to foster meaningful public participation and informed decision making [CEQA Guidelines, §§ 15088.5, 15126.6(f)]. If the District concludes that no feasible alternative locations exist, or the use of alternative locations as a mitigation measure is infeasible, the District must disclose the reasons in the final environmental document and recirculate [CEQA Guidelines, §§ 15088.5(a)(3), 15126.6(f)(2)].

4-28

Mitigation and Monitoring Reporting Plan. Per Public Resources Code section 21081.6(a)(1), CDFW has provided the District with a summary of our suggested mitigation measures and recommendations in the form of an attached Draft Mitigation and Monitoring Reporting Plan (MMRP; Attachment A). A final MMRP shall reflect results following additional plant and wildlife surveys and the Project's final on and/or off-site mitigation plans.

4-29

Filing Fees

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the District and serve to help defray the cost of environmental review by CDFW. Payment of the fee is

4-30

required for the underlying Project approval to be operative, vested, and final (Cal. Code Regs., tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089). 4-30

Conclusion

We appreciate the opportunity to comment on the Project to assist the District in adequately analyzing and minimizing/mitigating impacts to biological resources. CDFW requests an opportunity to review and comment on any response that the District has to our comments and to receive notification of any forthcoming hearing date(s) for the Project [CEQA Guidelines, § 15073(e)]. If you have any questions or comments regarding this letter, please contact Baron Barrera, Environmental Scientist, at Baron.Barrera@wildlife.ca.gov. 4-31

Sincerely,

DocuSigned by:
B6E58CFE24724F5...
Erinn Wilson-Olgin
Environmental Program Manager I
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Frances Alet - The Calabasas Coalition - fmalet@sbcglobal.net

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State of California – Natural Resources Agency
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GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director

Attachment A: Draft Mitigation and Monitoring Reporting Plan

CDFW recommends the following language to be incorporated into a future environmental document for the Project. A final MMRP shall reflect results following additional plant and wildlife surveys and the Project's final on and/or off-site mitigation plans.

Biological Resources (BIO)			
Mitigation Measure (MM) or Recommendation (REC)		**Timing**	**Responsible Party**
MM-BIO-1-Impacts to Aquatic and Riparian Resources; Lake and Streambed Alteration Agreement	**Mitigation Measure #1:** The Project applicant (or "entity") must provide written notification to CDFW pursuant to section 1600 *et seq.* of the Fish and Game Code. Based on this notification and other information, CDFW shall determine whether a Lake and Streambed Alteration (LSA) Agreement is required prior to conducting the proposed activities. A notification package for a LSA may be obtained by accessing CDFW's web site at https://www.wildlife.ca.gov/conservation/lsa. CDFW's issuance of an LSA Agreement for a Project that is subject to CEQA will require CEQA compliance actions by CDFW as a Responsible Agency. As a Responsible Agency, CDFW may consider the CEQA document of the Lead Agency for the Project. To minimize additional requirements by CDFW pursuant to section 1600 *et seq.* and/or under CEQA, the CEQA document should fully identify the potential impacts to streams or riparian resources and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the LSA Agreement.	Prior to/After Project construction and activities	Lead Agency/ Applicant
MM-BIO-2-Impacts to Aquatic and Riparian	Any LSA Agreement issued for the Project by CDFW may include additional measures protective of streambeds on and downstream of the Project such as additional erosion and pollution control measures. To compensate for any on-site and off-site impacts to	Prior to Project construction and activities	Lead Agency/ Applicant

Resources; Lake and Streambed Alteration Agreement	riparian resources, additional mitigation conditioned in any LSA Agreement may include the following: avoidance of resources, on-site or off-site creation, enhancement, or restoration, and/or protection and management of mitigation lands in perpetuity.		
MM-BIO-3- Impacts to Aquatic and Riparian Resources; Lake and Streambed Alteration Agreement	CDFW recommends fully avoiding impacts to streams and riparian/wetland vegetation communities. If feasible, CDFW recommends redesigning the Project to avoid impacts to the existing drainage features that support sensitive vegetation communities. Design alternatives should attempt to retain as much surface flow and natural hydrologic processes as possible.	Prior to Project construction and activities	Lead Agency/ Applicant
MM-BIO-4- Impacts to Aquatic and Riparian Resources; Lake and Streambed Alteration Agreement	If impacts to riparian habitat, such as arroyo willow thicket, mulefat thicket, and cattail marshes cannot be avoided, CDFW suggests mitigation should be achieved entirely on site if possible. CDFW recommends that impacts be mitigated at no less than 3:1. CDFW recommends that an on-site Habitat Mitigation and Monitoring Plan (HMMP) be developed. An HMMP should provide specific, detailed, and enforceable measures.	Prior to Project construction and activities	Lead Agency/ Applicant
MM-BIO-5- Impacts to Aquatic and Riparian Resources; Lake and Streambed Alteration Agreement	CDFW recommends fish passage improvement downstream of the diversion include the removal of the hardened crossing and replaced with a permanent fish passage improvement project providing uninterrupted fish passage for migrating steelhead.	Prior to Project construction and activities	Lead Agency/ Applicant

MM-BIO-6-Impacts to Aquatic and Riparian Resources; Lake and Streambed Alteration Agreement	CDFW recommends the District provide an in-stream flows analysis (including measurements of flows to inform operations of the fishway) and an evaluation of potential impacts on biological resources as part of the final environmental document. At a minimum, the analysis should provide the following: *Changes to Hydrology and Hydraulics* • CDFW recommends the District define the extent of up- and downstream reach of the Ventura River that may be directly and indirectly affected by the proposed Project and assess potential Project-related impacts on biological resources within this study reach (including any potential groundwater dependent ecosystems). • An analysis of potential Project-related changes to river hydraulics in both concrete and soft-bottom reaches. This includes water depth (percent change), wetted perimeter (acres gained/lost), and velocity (percent change). Comparing total wetted area may be useful in quantifying the effects on groundwater dependent ecosystems, assuming that infiltration rates are proportional to wetted area. • CDFW recommends using a 2-D hydraulic model of proposed versus existing habitat to determine whether habitat changes are expected. • A map of potential changes to channel hydraulics overlain on a map of plant communities and habitat for sensitive wildlife species and birds. • A discussion of Project-related impacts on biological resources in relation to changes in hydrology throughout the reach. • CDFW recommends using Normalized Difference Vegetation Index (NDVI) and Normalized Difference Moisture Index (NDMI) to assess habitat health for the reach on an annual basis.	Prior to Project construction and activities	Lead Agency/ Applicant

	• Previous and continuous monitoring of flows at the Facility to inform operations of the fishway.		
MM-BIO-7- Impacts to Aquatic and Riparian Resources; Lake and Streambed Alteration Agreement	CDFW met with the District on November 15, 2021, to discuss the *Instream Flow Evaluation: Southern California Steelhead Passage Through the Intermittent Reach of the Ventura River, Ventura County* report. CDFW recommend the District continue to collaborate with the necessary resource agencies (including CDFW) to ensure adequate flows for biological resources. These discussions should address monitoring of flows to the Facility, incorporating flow recommendations into the in-stream flows analysis for the intermittent reach of the Ventura river (see Fish and Game Code 3901 – 3938).	Prior to Project construction and activities	Lead Agency/ Applicant
MM-BIO-8- Impacts to Least Bell's Vireo	Impacts to known historic least Bell's vireo nesting habitat should be avoided.	Prior to Project construction and activities	Lead Agency/ Applicant
MM-BIO-9- Impacts to Least Bell's Vireo	Take under the federal Endangered Species Act (ESA) is more broadly defined than CESA; take under ESA also includes significant habitat modification or degradation that could result in death or injury to a listed species by interfering with essential behavioral patterns such as breeding, foraging, or nesting.	Prior to Project construction and activities	Lead Agency/ Applicant
MM-BIO-10- Impacts to California Species of Special Concern	The District should retain a qualified biologist(s) with experience surveying for or is familiar with the life history of each of the species mentioned above. The qualified biologist should conduct focused surveys for SSC and suitable habitat no more than one month from the start of any ground-disturbing activities or vegetation removal where there may be impacts to SSC. In addition, the qualified biologist should conduct daily biological monitoring during any activities involving vegetation	Prior to Project construction and activities	Lead Agency/ Applicant

	clearing or modification of natural habitat. Positive detections of SSC and suitable habitat at the detection location should be mapped and photographed. The qualified biologist should provide a summary report of SSC surveys to the District prior to implementing any Project-related ground-disturbing activities and vegetation removal. Depending on the survey results, a qualified biologist should develop species-specific mitigation measures for implementation during the Project.		
MM-BIO-11- Impacts to California Species of Special Concern	Wildlife should be protected, allowed to move away on its own (non-invasive, passive relocation), or relocated to adjacent appropriate habitat on site or to suitable habitat adjacent to the project area. SSC should be captured only by a qualified biologist with proper handling permits. The qualified biologist should prepare a species-specific list (or plan) of proper handling and relocation protocols and a map of suitable and safe relocation areas. A relocation plan should be submitted to the District prior to implementing any Project-related ground-disturbing activities and vegetation removal.	Prior to Project construction and activities	Lead Agency/ Applicant
MM-BIO-12- Impacts to California Species of Special Concern	The District, in consultation with a qualified biologist, should prepare a worker environmental awareness training. The qualified biologist should communicate to workers that upon encounter with an SSC (e.g., during construction or equipment inspections), work must stop, a qualified biologist must be notified, and work may only resume once a qualified biologist has determined that it is safe to do so.	Prior to Project construction and activities	Lead Agency/ Applicant
MM-BIO-13- Impacts to California Species of Special Concern	If any SSC are harmed during relocation or a dead or injured animal is found, work in the immediate area should stop immediately, the qualified biologist should be notified, and dead or injured wildlife documented. A formal report should be sent to CDFW and the District within three calendar days of the incident or finding. Work in the immediate area may only resume once the proper notifications have been made and additional mitigation measures have been identified to prevent additional injury or death.	Prior to Project construction and activities	Lead Agency/ Applicant

MM-BIO-14- Impacts to Non-Game Mammals and Wildlife	If fencing is proposed for use during construction or during the life of the Project, fences shall be constructed with materials that are not harmful to wildlife. Prohibited materials include, but are not limited to, spikes, glass, razor, or barbed wire. Fencing shall also be minimized so as not to restrict free wildlife movement through habitat areas.	Prior to Project construction and activities	Lead Agency/ Applicant
MM-BIO-15- Impacts to Non-Game Mammals and Wildlife	To avoid direct mortality, a qualified biological monitor shall be on site prior to and during ground and habitat disturbing activities to move out of harm's way special status species or other wildlife of low mobility that would be injured or killed by grubbing or Project-related construction activities. Salvaged wildlife of low mobility shall be removed and placed onto adjacent and suitable (i.e., species appropriate) habitat out of harm's way. It should be noted that the temporary relocation of on-site wildlife does not constitute effective mitigation for the purposes of offsetting Program impacts associated with habitat loss.	Prior to Project construction and activities	Lead Agency/ Applicant
MM-BIO-16- Impacts to Non-Game Mammals and Wildlife	Grubbing and grading shall be done to avoid islands of habitat where wildlife may take refuge and later be killed by heavy equipment. Grubbing and grading shall be done from the center of the Project site, working outward towards adjacent habitat off site where wildlife may safely escape.	Prior to Project construction and activities	Lead Agency/ Applicant

Letter 4

COMMENTER: Erinn Wilson-Olgin, California Department of Fish and Wildlife

DATE: December 8, 2021

Casitas and CDFW have worked together for many years on the construction and operation of the Robles Fish Passage Facility (Facility). The Facility design was developed collaboratively through the Robles Technical Advisory Committee (TAC), which included both National Marine Fisheries Service (NMFS) and CDFW representatives to meet respective fish passage criteria and instream flow objectives. The resulting design and operation of the Facility is evaluated on an annual basis through the Robles Biological Committee (BC) established by the Robles Biological Opinion (BO). The Robles BC also includes NMFS and CDFW representatives. Annual progress reports have been developed through the BC collaborative process detailing the Robles Monitoring and Evaluation Study components. These annual progress reports can be found on the Casitas MWD website.

Casitas acquired agreements and permits for construction of the Facility from CDFW, United States Army Corps of Engineers (USACE), Los Angeles Regional Water Quality Control Board (LARWQCB), NMFS, and USFWS. With the exception of the BO issued by NMFS, these construction permits and authorizations did not cover maintenance of the Facility, and Casitas currently acquires agreements and permits on an as-needed basis for individual maintenance and repair activities at the Facility. For example, Casitas obtained a Lake and Streambed Alteration (LSA) Agreement from CDFW pursuant to Section 1600 et seq. of the Fish and Game Code for removal and relocation of trapped sediment in the forebay in 2005 and 2019, along with required permits and authorizations from several other agencies.

Casitas has implemented environmental protection measures as requested by the state and federal resource agencies pursuant to past permits and authorizations issued for as-needed maintenance and repair projects. Casitas proposes continuing to implement environmental protection measures into its ongoing annual maintenance and repair program and is seeking longer-term programmatic permits to provide a more streamlined administrative process and comprehensive basis for protecting environmental resources.

While the IS-MND refers to the proposed Repair and Maintenance Program as a “project,” this is CEQA terminology, used only for the purposes of the environmental review process. As defined in the State CEQA Guidelines, the term “project” refers to a discretionary action by a governmental agency, and includes the whole of the action taken. The Repair and Maintenance Program assessed in the Draft IS-MND does not include any proposed construction projects. Rather, the primary objective of the proposed repair and maintenance activities is to ensure effective operation of the existing fish passage and water diversion operations under the design developed with NMFS and CDFW.

Response 4-1

The commenter states CDFW reviewed the CEQA document for the project and appreciates the opportunity to provide comments regarding those aspects of the project.

The comment has been noted and the information is appreciated.

Response 4-2

The commenter states the provided comments and recommendations are to assist the District in adequately identifying and avoiding direct and indirect impacts on fish and wildlife (biological) resources. In addition, CDFW recommends the measures described in its letter be included in a "science-based monitoring program that contains adaptive management strategies" as part of the project's Mitigation Monitoring and Reporting Program (MMRP).

The intent of the proposed operational activities is to provide a comprehensive repair and maintenance program with a primary objective of ensuring the continued and proper operation of the Facility. By maintaining the Facility consistent with its original design, the District reduces or prevents ineffective operation of the water diversion and fish ladder. As described in Section 12, *Annual Reporting*, on page 41 of the Final IS-MND, the District will provide annual reports to the regulatory agencies with information regarding routine maintenance and repair activities for the previous and current year. The information will be submitted in spreadsheet format under a cover letter signed and dated by the General Manager by May 30 of each year, and will include an adaptive management strategy consisting of a summary of the proposed approach for sediment removal in August/September of the respective year (including quantities of sediment to be removed and relocated). These existing stipulations included as part of the repair and maintenance program provide for monitoring activities in excess of those requested in this comment. Therefore, no changes to the mitigation measures or MMRP have been incorporated in response to this comment.

The commenter states project activities would occur in the Ventura River and are subject to Fish and Game Code, section 1600 et. seq., such that CDFW should receive written notification from the District of these activities. Notification was provided to CDFW on May 5, 2023. Information pertaining to operation and planned routine maintenance activities are described in the Project Description section of the Notification and further detailed in a standalone Project Description that was provided as an attachment to the Notification. CDFW has determined an LSA Agreement is required prior to the District conducting the routine repair and maintenance activities which comprise the project. Due to its discretionary permitting authority over the project, as stated by the commenter, CDFW is a CEQA Responsible Agency for the project and therefore must adopt a CEQA document for its own CEQA compliance purposes. Based upon consideration of the District's CEQA document, CDFW may use the District's CEQA document for this purpose. The commenter states the CEQA document should fully identify the potential impacts to streams or riparian resources and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the LSA Agreement.

The IS-MND addresses all potential impacts to biological resources under the jurisdiction of CDFW. Casitas is aware of the LSA program and has met with CDFW on several occasions dating back to 2019 to discuss the terms of an LSA for routine maintenance at the site. Minor changes have been made to the Draft IS-MND, reflected in the revised Final IS-MND, which are intended to update the project description in accordance with feedback received from CDFW regarding the LSA Agreement for the proposed project.

Response 4-3

The commenter states CDFW is concerned flows in the river may be insufficient for native fishes' volitional passage up and down stream, particularly steelhead (*Oncorhynchus mykiss*), arroyo chub

(*Gila orcutti*), and partially-armored threespine stickleback (*Gasterosteus aculeatus macrocephalus*). The commenter references Fish and Game Code, § 5901 with respect to this concern.

The District acknowledges this concern, and has coordinated closely with CDFW and NMFS regarding the design of the Facility through the Robles TAC, which included both NMFS and CDFW representatives working collaboratively to design the Facility to meet each agency's respective fish passage criteria and instream flow release objectives. The fish ladder and fish passage was evaluated by the NMFS, in their BO for the Facility (NMFS 2003). In their Opinion, they concluded that construction and operation of the fish passage facility was not likely to jeopardize the continued existence of steelhead. The Opinion included Reasonable and Prudent Measures to minimize the incidental take of steelhead. These measures apply equally to other native fish, including arroyo chub and partially-armored threespine stickleback. The proposed maintenance and repair of the existing Facility would improve fish passage, by allowing the District to keep the fish ladder and associated entrance pool in working order and free from obstructions.

Casitas constructed the fishway, fish screen, high-and low-flow fish exit channels, a spillway energy dissipater, and a series of low-head rock weirs at the Robles Facility that provide for the safe upstream and downstream passage of adult steelhead and the safe downstream passage of juveniles. The maintenance and repair activities do not include a change to the Facility's design. The activities include sediment/debris removal; vegetation control; repair and maintenance of the radial gates (at the entrance to the headworks and spillway) and other facility control gates; instrumentation; and road maintenance. Repair activities also include concrete work within the existing footprint of the Facility and replacement of wood timbers (timber cut-off wall and debris fence). Typically, these maintenance and repair activities will occur in the dry season when surface water is absent, and fish would not be present. Therefore, no adverse impacts to fish passage would occur as a result of the repair and maintenance activities; to the contrary, operation and maintenance of the Facility, including with implementation of the BMPs detailed in the IS-MND, would have beneficial effects to fish passage, by nature of the purpose of the Facility being to provide fish passage as designed in coordination with NMFS and CDFW through the Robles TAC.

In addition, the continued maintenance and repair of the existing Facility would not change existing water rights (i.e., authorized diversion rates); thus, the maintenance and repair activities would neither reduce the amount of water available for native fish nor result in insufficient instream flow for native fish, and the Facility would continue to be maintained in the design informed by NMFS and CDFW through the Robles TAC.

Response 4-4

The comment states CDFW is concerned flows may be insufficient to keep native fish that may be planted or exist below the diversion in good condition, and references Fish and Game Code, § 5937.

As described in Response 4-3, instream flows would be sufficient to support native fish within the Ventura River. Climatic conditions within the Ventura River are highly variable and subject to dramatic oscillation. This observation is described in Molinari et. al. (2015) and Inman and Jenkins (1999) where they state that water and sediment flow in southern California, and specifically in the Los Padres National Forest and neighboring lands, has a history of dramatic fluctuations that have been largely driven by multi-decadal climate variability and the El Nino/Southern Oscillation (ENSO) events.

In CDFW's Habitat and Instream Flow Evaluation for Steelhead in the Ventura River Study Plan (CDFW 2017), CDFW indicated the Ventura River watershed experiences a high level of interannual variability, where cycles of wet and dry years can last decades. Beller et al. (2011 in CDFW 2017) describes the extremely inconsistent hydrologic regime of the Ventura River being caused by climatic variability. The Study Plan notes over the last 75 years, mean annual discharge has varied from 5 to 3,400 cubic feet per second (Leydecker and Grabowsky 2006 in CDFW 2017). Average annual rainfall does not accurately portray the extreme variability in the watershed. Regardless, the proposed maintenance and repair activities do not include a change to the Facility's design or propose changes to existing water rights (i.e., authorized diversion rates); thus, the activities would neither reduce the amount of water available for native fish nor result in insufficient instream flow for native fish.

Response 4-5

The comment states CDFW is concerned that biological resources (potentially including groundwater dependent ecosystems) may be impacted. While the maintenance and repair activities would remove sediment and riparian vegetation in the downstream portion of the entrance pool, sediment clean out is necessary to allow proper fish entrance gate operation, and overall uniform hydraulic flow patterns throughout entrance pool. As described in the IS-MND, immature willows in a dynamic fluvial area would be removed during operational activities; sediment in this area is routinely scoured and redeposited by river flows, such that permanent vegetation cannot persist. Therefore, removal of these willows, which would occur during removal of accumulated sediment, would not affect mature trees or permanent vegetation. Additionally, maintenance of the vegetation along the wall helps to ensure overtopping flows are dissipated across larger area to minimize erosion at constricted sections within the Ventura River and reduce water elevations in forebay as designed. The sediment management activities would provide overall benefit to biological resources, including native species and riparian habitat (e.g., groundwater dependent ecosystems).

Response 4-6

The comment states CDFW is concerned the hardened crossing below the diversion impedes upstream migration of southern California steelhead. For context, Casitas entered into an agreement with the U.S. Department of Interior, Bureau of Reclamation (Reclamation) that led to the construction of the Casitas Dam and associated facilities (the Ventura River Project) which were completed in 1958. In 2004, Casitas constructed a fish ladder (fishway), fish screen, high- and low-flow fish exit channels, a spillway energy dissipater, and a series of low-head rock weirs at the Facility. The previous modifications to the existing Facility provide for the safe upstream and downstream passage of adult steelhead and the safe downstream passage of juveniles. Reclamation owns the Facility, and Casitas operates and maintains this Facility. The Facility design was developed through the Robles TAC. The TAC included both NMFS and CDFW representatives and works collaboratively to design the facility to meet their respective fish passage criteria and instream flow release objectives.

The hardened crossing below the diversion does not impede upstream migration of southern California steelhead, as *O. mykiss* have been observed passing through the VAKI Riverwatcher fish counter since the hardened crossing was constructed in 2004.

Fish monitoring conducted by Casitas using a VAKI Riverwatcher at the fish passageway detected 11 adult-sized steelhead passing the Facility, but the last detection occurred in 2011, before the extended drought. During the 2021 fish migration season, the VAKI Riverwatcher detected one *O. mykiss* passing downstream through the Facility. Therefore, the hardened crossing below the diversion does not impede upstream migration of southern California steelhead. Further, the project entails maintenance only and would not change the design or functional characteristics of the crossing. No mitigation is warranted as the maintenance and repair activities would not cause significant impacts related to fish passage.

Response 4-7

This comment reiterates CDFW's concerns and provides specific details regarding impacts to aquatic and riparian resources, and suggests that the project proposes to modify the Ventura River and its flow regime and may substantially adversely affect the existing stream, which absent specific mitigation, could result in substantial impacts to fish and wildlife. Debris, soil, silt, oil or other petroleum products, or any other substances which could be hazardous or deleterious to aquatic life, wildlife, or riparian habitat resulting from project-related activities may enter the stream. As noted in Responses 4-2 – 4-6 above, the project is limited to maintenance of existing authorized infrastructure in the river. The proposed maintenance activities are necessary to keep the diversion and associated fish passage facility in working condition, and would improve conditions for fish by enabling maintenance to occur promptly when needed. Sediment management would occur during dry conditions only, and would not adversely affect water quality. While limited removal of immature riparian vegetation would occur, this vegetation is in the dynamic river channel where it would be removed by natural processes rather than growing to maturity. Considering this information, the project would not have negative effects on stream functions.

Response 4-8

This comment recommends additional mitigation related to providing written notification to CDFW pursuant to section 1600 et seq. of the Fish and Game Code. The comment has been noted, and the commenter is referred to Response 4-2 above. The District is engaged with CDFW staff regarding authorization of the project under Sections 1600 et seq. of the Fish and Game Code.

Response 4-9

This comment clarifies that any LSA Agreement issued for the project by CDFW may include additional measures protective of the stream and fish and wildlife at the project site and downstream of the project. To compensate for any on-site and off-site impacts to riparian resources, the comment notes that additional mitigation conditioned in any LSA Agreement may include the following: avoidance of resources, on-site or off-site creation, enhancement, or restoration, and/or protection and management of mitigation lands in perpetuity. The District is familiar with the LSA program and is engaged with CDFW regarding Section 1600 authorization for the project. The District is committed to implementing a suite of BMPs during annual repair and maintenance activities. The suite of BMPs have been required pursuant to previously issued permits, authorizations and consultations with state and federal resource agencies, including under section 7 of the federal Endangered Species Act (ESA). Casitas has implemented these BMPs during past maintenance and repair activities. The BMPs may be revised or augmented pursuant to the documents issued by NMFS and USFWS for the annual maintenance and repair program. Casitas will implement BMPs as they apply to each activity. Each spring, Casitas will prepare a maintenance and

repair plan for the next fiscal year (July 1 – June 30), which will include a list of repair and maintenance activities planned, schedule and timing, and associated BMPs to be implemented for each activity. BMPs include pre-construction surveys for special status species, on-site biological monitoring, material storage, noxious vegetation removal, worker environmental training, etc. The intent of the BMPs proposed is to protect the stream and fish and wildlife at the project site and downstream of the site.

Response 4-10

This commenter recommends fully avoiding impacts to streams, riparian, and wetland vegetation communities, suggesting a redesign of the project to avoid impacts to the existing drainage features that support sensitive vegetation communities.

The Facility design was developed through the Robles TAC, which included both NMFS and CDFW representatives. The proposed maintenance and repair activities at the Facility would include sediment/debris removal; vegetation control; repair and maintenance of the radial gates (at the entrance to the headworks and spillway) and other facility control gates; instrumentation; and road maintenance. Repair activities also include concrete work within the existing footprint of the Facility and replacement of wood timbers (timber cut-off wall and debris fence). Typically, these maintenance and repair activities will occur in the dry season when surface water is absent, and fish would not be present.

Complete avoidance of the Ventura River is not feasible for the project, because it entails maintenance of existing infrastructure in the river. The project does not include a change to the Facility's design and a redesign is not warranted because the removal of the immature, small stand of willows in the entrance pool would not have a substantial adverse effect on riparian habitat of sensitive natural communities. The entrance pool is located in a fluvial area, within the Ventura River where no vegetation is considered to be permanent given the natural hydrologic regime. Sediment is routinely scoured and redeposited in the entrance pool depending on storm events. The extent of vegetation in the entrance pool changes from year to year, under natural conditions. Indirect impacts from construction materials (e.g., stockpiled materials, construction equipment, and trash) stored on site could adversely affect water quality (e.g., increased turbidity, altered pH, decreased dissolved oxygen levels, etc.) within the water features if runoff were to occur during storm events. Implementation of BMP-10 through BMP-21 would avoid potential indirect impacts to riparian and wetland vegetation. Therefore, the maintenance and repair activities avoid impacts to the Ventura River and its associated riparian and wetland vegetation communities and a redesign of the Facility is not warranted.

Response 4-11

This comment recommends on-site mitigation for impacts to riparian vegetation and recommends an on-site Habitat Mitigation and Monitoring Plan (HMMP) be developed. As described in the IS-MND and clarified in Response 4-10 above, the project would not result in significant impacts to riparian vegetation.

Response 4-12

This comment recommends fish passage improvement downstream of the diversion include the removal of the hardened crossing and replaced with a permanent fish passage improvement project providing uninterrupted fish passage for migrating steelhead. The comment has been noted;

however, redesigning the facility to replace the existing hardened road crossing is beyond the scope of the current proposed repair and maintenance program.

Response 4-13

The commenter recommends the District provide an in-stream flows analysis (including measurements of inflows to inform operations of the fishway) and an evaluation of potential impacts on biological resources as part of the final environmental document.

The Facility design was developed through the TAC. The TAC included both NMFS and CDFW representatives working collaboratively to design the facility to meet their respective fish passage criteria and instream flow release objectives. The resulting design and operation of the Facility was to be evaluated, once construction was completed, on an annual basis through the Robles BC established by the Robles BO, as discussed in the background information provided above Response 4-1. The Robles BC also includes NMFS and CDFW representatives. Annual progress reports have been developed through the BC collaborative process detailing the Robles monitoring and evaluation study components. These annual progress reports can be found on the Casitas Municipal Water District website. Additional analysis of instream flows is not needed to support environmental analysis of the proposed project, especially considering that the project does not include new or expanded water diversion rights.

Response 4-14

The comment states CDFW met with the District on November 15, 2021, to discuss the *Instream Flow Evaluation: Southern California Steelhead Passage Through the Intermittent Reach of the Ventura River, Ventura County* report, and recommends the District continue to collaborate with the necessary resource agencies (including CDFW) to ensure adequate flows for biological resources. The comment is noted. As stated above, the District and CDFW will continue to collaborate together via the TAC. However, altering the operational parameters or monitoring regime of the Facility is outside the scope of the proposed repair and maintenance program and the associated IS-MND.

Response 4-15

The commenter notes that the District is proposing to perform maintenance and repair activities in the Ventura River outside of the nesting bird season and states that CDFW agrees with this approach, but adds that proposed activities such as vegetation crushing/clearing, may result in the destruction of least Bell's vireo nests and known historic nesting habitat as described in the California Natural Diversity Database (CNDDB). Therefore, CDFW requests impacts to known historic least Bell's vireo nesting habitat be avoided.

Casitas conducted protocol surveys within the project area for Least Bell's vireo (LBVI) during the 2020 nesting season and no LBVI individuals, nesting behavior, or nest structures were observed. In addition, LBVI have not been documented within the project area although they are known to occur in the larger Ventura River watershed. Because repair and maintenance activities would occur outside the nesting season, individual LBVI would not be impacted or taken during project activities. Impacts to habitat would not be significant because the willow area to be removed is small and is situated in an area where river flows naturally scour the vegetation before it reaches maturity.

The USFWS has issued a letter concurring with Reclamation's determination that implementation of the maintenance and repair program is not likely to adversely affect the endangered LBVI.

Response 4-16

This comment recommends additional mitigation related to avoiding impacts to known historic least Bell's vireo nesting habitat. The comment has been noted and the commenter is referred to Response 4-15 above.

Response 4-17

This comment clarifies that take under the federal ESA is more broadly defined than CESA; take under ESA also includes significant habitat modification or degradation that could result in death or injury to a listed species by interfering with essential behavioral patterns such as breeding, foraging, or nesting. The comment has been noted and the commenter is referred to Response 4-15 above.

Response 4-18

The comment states CDFW is concerned that project-related activities may result in significant impacts to ESA-listed red-legged frog (CRLF; *Rana draytonii*) and southwestern pond turtle (WPT; *Actinemys pallida*). The commenter states that both species are listed as species of special concern and provides evidence suggesting that the project's impacts would be significant because project construction and activities, directly or through habitat modification, may result in direct mortality, reduced reproductive capacity, population declines, or local extirpation of SSC.

As described in the BRA, the upstream portion of the Ventura River (above the Facility) provides suitable habitat for WPT and the species is known to be present within the study area. However, the river reach between the State Route (SR) 150 bridge and the Facility was described as non-suitable for CRLF during surveys conducted in 2007 (Catalyst 2019). The reach from the Facility to one mile upstream was described as suitable habitat only in the first 2,000 feet of river, just upstream of the Facility (ERA 2007). The 2007 surveys extended above Matilija Reservoir and all CRLF documented were located above the reservoir (ERA 2007). Between November 13, 2018 and November 20, 2018, protocol surveys were conducted by Catalyst (2019) within a two-mile reach upstream and downstream of the Facility. No CRLF were observed within these reaches. Between October 10, 2019 and November 3, 2019, protocol surveys were conducted again by Rincon within a two-mile reach upstream and downstream of the Facility, and no CRLF were observed.

As described in the IS-MND potential adverse effects to CRLF and WPT during maintenance and repair activities include, but are not limited to direct mortality or injury as a result of vehicle traffic and equipment operation on access roads, at access points along the banks of the Ventura River, and in the river channel. In addition, these species may be injured or killed as a result of being trampled by workers, and from activities such as excavation of sediment and debris, placement of sediment and debris, material stockpiling, and vegetation removal. For CRLF, vehicle and equipment operation, worker foot traffic, material stockpiling and vegetation removal in the BSA could result in directly crushing adults, larvae, or eggs if present while activities are conducted. The proposed activities could adversely affect CRLF of any life stage given the known occurrence of the species, marginally suitable habitat within the project site, and potential overlap of proposed activities with the species' dispersal period (May 1 and July 1). The proposed activities would cause temporary disturbance and/or loss of aquatic, upland, and dispersal habitat, and could result in mortality of some CRLF larvae, juveniles or adults, with a lower probability of effects to egg masses. Based on the limited spatial and temporal extent of proposed activities, the limited work schedule (dry season), and the fact that CRLF were never observed at the Facility; few, if any, CRLF are likely to be killed or injured.

With the implementation of the project BMPs, including but not limited to the Environmental Training, Biological Monitoring, and focused pre-construction surveys, the effects from the proposal Annual Repair and Maintenance Program to CRLF and WPT would be less than significant.

Response 4-19

The commenter recommends additional mitigation related to qualifying biologists and issuance of Scientific Collecting Permits. Pursuant to the California Code of Regulations, title 14, section 650, the commenter recommends the District/qualified biologist must obtain appropriate handling permits to capture, temporarily possess, and relocate wildlife to avoid harm or mortality in connection with project construction and activities. This comment is noted and no change is warranted as BMP-9 stipulates that a qualified biological monitor (with all of the required collection permits) will be onsite during all project operations that involve removal of the first 12 inches of soil/substrate, water diversions, de-watering, exposed (excavated) work areas, and work within sensitive habitat areas where sensitive species may be present.

Response 4-20

The commenter requests the District retain a qualified biologist(s) with experience surveying for and familiarity with the life history of each of the species mentioned above. The commenter is referred to Response 4-19 above.

The commenter also recommends that the qualified biologist should conduct focused surveys for SSC and suitable habitat no more than one month from the start of any ground-disturbing activities or vegetation removal where there may be impacts to SSC. In addition, the commenter requests that the qualified biologist conduct daily biological monitoring during any activities involving vegetation clearing or modification of natural habitat. The BRA documents the results of several focused surveys that were conducted for the proposed project area. These surveys included focused rare plant and special-status wildlife surveys conducted during the appropriate time period (i.e., rare plants) and based on coordination with the USFWS and NMFS (CRLF and steelhead). The potential for special-status species within the project area is well established; thus, pre-construction surveys a month ahead of project initiation is not warranted. Furthermore, BMP-3, -4, -5, -6, and -8 require qualified biologists to conduct pre-construction surveys for special-status wildlife and nesting birds.

The commenter further adds that positive detections of SSC and suitable habitat at the detection location should be mapped and photographed and that a summary report of SSC surveys to the District prior to implementing any project-related ground-disturbing activities and vegetation removal. Depending on the survey results, a qualified biologist should develop species-specific mitigation measures for implementation during the project. The project's BMPs include procedures to document and report positive observations; thus, this additional mitigation is not warranted.

Response 4-21

This comment states that wildlife should be protected, allowed to move away on its own (non-invasive, passive relocation), or relocated to adjacent appropriate habitat on site or to suitable habitat adjacent to the project area. As described on page 69 of the IS-MND, pre-construction surveys (BMP-5), conducting activities in the dry season (BMP-1), environmental training (BMP-2), and relocation of individuals prior to construction (BMP-3) would limit impacts to special-status species.

The commenter suggests that a species-specific list (or plan) of proper handling and relocation protocols and a map of suitable and safe relocation areas be prepared and submitted to the District prior to implementing any project-related ground-disturbing activities and vegetation removal. This comment has been noted, and as stated in the IS-MND for capture and relocation efforts, approved biologist(s) must follow the Declining Amphibian Population Task Force's Code of Practice, in accordance with the USFWS BO (2019).

Response 4-22

This comment states that the District, in consultation with a qualified biologist, should prepare a worker environmental awareness training. BMP-2 stipulates that the environmental training program shall be prepared, and shall include identification of sensitive species and habitats, a description of the regulatory status and general ecological characteristics of sensitive resources, and review of the limits of construction and measures required to avoid and minimize impacts to biological resources within the work area.

Response 4-23

The commenter recommends that the training should include procedures if there is an injury to any SSC during relocation or when a dead or injured animal is found. Specifically, CDFW recommends that work in the immediate area should stop immediately, the qualified biologist should be notified, and dead or injured wildlife documented. A formal report should be sent to CDFW and the District within three calendar days of the incident or finding. This information is appreciated, and the comment has been noted, but no change or additional mitigation is warranted.

Maintenance and repair activities are not expected to result in direct mortality or injury to wildlife. With the implementation of BMP-1, BMP-2, BMP-6, BMP-9, BMP-23, and BMP-24, which are identified in the Project Description and would be implemented as part of the project, the effects from the proposed Annual Repair and Maintenance Program would be discountable and less than significant.

Response 4-24

This comment recommends additional mitigation related to impacts to non-game mammals and wildlife that may move through the project site. The comment has been noted and the commenter is referred to Response 4-18 – 4-20 above. No additional mitigation or changes are warranted.

Response 4-25

This comment recommends additional mitigation should fencing be proposed during construction or during the life of the project. The comment has been noted and the commenter is referred to Responses 2-6 and 4-2 above. No additional mitigation or changes are warranted.

Response 4-26

This comment recommends a biological monitor be on site prior to and during ground and habitat disturbing activities. As described in BMP-9, a qualified biological monitor (with all of the required collection permits) will be onsite during all project operations that involve removal of the first 12 inches of soil/substrate, water diversions, de-watering, exposed (excavated) work areas, and work within sensitive habitat areas where sensitive species may be present. After the previously specified

work activities are completed that require a monitor to be onsite, the monitor will then remain onsite for the remainder of the project (as work occurs in the Ventura River) for no less than two days per week, for a minimum two-hour period per day. Dependent upon work conditions and/or prolonged project activities, Casitas may potentially arrange for a decrease in biological monitoring with Reclamation, USFWS, NMFS, and CDFW. No additional mitigation or changes are warranted.

Response 4-27

This comment recommends grubbing and grading be done from the center of the project site, working outward towards adjacent habitat off site where wildlife may safely escape. The comment has been noted, the suggestion is appreciated, and the commenter is referred to Responses 2-6 and 4-2 above. The project does not include substantial habitat removal through grading, and no additional mitigation or changes are warranted.

Response 4-28

This comment recommends the District consider an alternative that would fully avoid or minimize impacts to streams, sensitive plants, and wildlife. CDFW further recommends the District recirculate the environmental document after including alternative locations in order to foster meaningful public participation and informed decision making. The District operates the Facility, which includes the dam and the forebay constructed in the late 1950s, and the fish passage components (fish ladder, fish screen, high and low flow fish exit channels, a spillway energy dissipater, and a series of low-head stone weirs) constructed in 2003/04, after southern California anadromous steelhead were listed as endangered under the federal Endangered Species Act. In 2003, Casitas acquired agreements and permits from CDFW, USACE, LARWQCB, NMFS and USFWS for construction of the Robles Diversion Fish Passage Facility.

Typical maintenance activities at the Facility include sediment/debris removal; vegetation control; repair and maintenance of the radial gates (at the entrance to the headworks and spillway) and other facility control gates; instrumentation; and road maintenance. Repair activities also include concrete work within the existing footprint of the Facility and replacement of wood timbers (timber cut-off wall and debris fence). As such, there are no alternatives to maintaining the existing Facility. However, as described in the IS-MND and clarified in the responses to comments, all potential impacts would be mitigated to a less than significant level. No changes or recirculation are warranted.

Response 4-29

The comment notes that CDFW has provided the District with a summary of suggested mitigation measures and recommendations in the form of an attached Draft MMRP. An MMRP is included with the Final IS-MND as required by CEQA. No changes to project mitigation measures are warranted as a result of this comment letter; thus, no additional response is necessary.

Response 4-30

The commenter states that the project is subject to a filing fee and that payment of the fee is required. This comment has been noted and all applicable fees will be paid as required. No additional response is necessary.

Figure Changes

In response to minor changes to the project description and Draft IS-MND, Figure 2, Figure 3, Figure 6, and Figure 8 have been updated in the Final IS-MND to reflect the revised locations of project components. Figure 9 has been updated in the Final IS-MND to reflect the revised annual monitoring and reporting flow.

References

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CASITAS MUNICIPAL WATER DISTRICT
MEMORANDUM

TO:	BOARD OF DIRECTORS
FROM:	MICHAEL FLOOD, GENERAL MANAGER
SUBJECT:	CASITAS AND OJAI WATER SYSTEM CONSOLIDATION
DATE:	12/11/24

RECOMMENDATION:

- Authorize the General Manager to issue a Task Order to Rincon Consultants, Inc. for the Casitas and Ojai Water System Consolidation project in an amount not to exceed $91,455.00.

BACKGROUND:

On June 12, 2024, the Board adopted Resolution No. 2024-08 authorizing the General Manager to apply for a grant from the State of California Safe Drinking Water State Revolving Fund (DWSRF) for the consolidation of the Casitas Water System and Ojai Water System (OWS). Projects included in the grant request include:

- Private Drive pipeline
- Arbolada Pump Station
- Foothill Road pipeline
- Abandon Running Ridge Tanks
- Demolish Valley View Pump Station
- Ammonia addition at OWS Wellfield
- New Ojai East Tank 2
- Rehabilitation of Ojai East Tank 1
- Demolish Arbolada Tank

Some of the project have nearly complete design documents. The grant request is for $10,010,000 to fund design completion and construction. DWRSF funding requires completion of the California Environmental Quality Act process and the inclusion of Federal cross-cutting requirements. A proposal was requested from Rincon Consultants to perform this work. Their detailed proposal is attached.

FINANCIAL IMPACT:

The budget for fiscal year 2024-25 includes $25,000 for the Casitas and Ojai Water System Consolidation project. An additional budget of $70,000 is requested, which includes contingency for additional tasks, if necessary.

Attachments: Proposal from Rincon Consultants dated 12/5/2024

Rincon Consultants, Inc.
180 North Ashwood Avenue
Ventura, California 93003
805-644-4455

December 5, 2024
Rincon Project No. 24-15742

Julia Aranda, Engineering Manager
Casitas Municipal Water District
1055 Ventura Avenue
Oak View, California 93022
Via email: jaranda@casitaswater.com

Subject: Proposal to Provide Environmental Consulting Services for the Ojai Water System and Casitas Integration Project

Dear Ms. Aranda:

Rincon Consultants, Inc. (Rincon) is pleased to submit this proposal to provide environmental consulting services for the Casitas Municipal Water District (Casitas) Ojai Water System and Casitas Integration Project (project).

Background

Casitas acquired the Ojai Water System in 2017 from Golden State Water Company. Casitas intends to integrate the Ojai Water System with the Casitas System. Some physical improvements will be required to address system hydraulics as well as water quality compatibility, since the Casitas System uses chloramines for disinfection and the Ojai Water System uses chlorination. In April 2022, an Ojai Water System and Casitas Integration Analysis was prepared by MKN to evaluate alternatives.

Attachment 1 summarizes the high-level construction and design project components, as provided by Casitas to Rincon Project Manager Amanda Antonelli via email on October 28, 2024. Physical improvements may include activities such as introduction of new water treatment equipment at an existing wellfield, pipeline improvements, and water tank replacements. We understand all physical improvements would occur within previously disturbed roadways or at existing facilities within previously disturbed areas.

In 2019, Rincon prepared the Ojai Water System Improvements Project Initial Study-Mitigated Negative Declaration (IS-MND), with Casitas as lead agency. The Ojai Water System Improvements Project involved approximately eight miles of pipeline replacements and assorted infrastructure improvements. An Addendum was prepared by Rincon for several pipeline alignment refinements in April 2020. Rincon prepared a Second Addendum in December 2020. The proposed project includes work at some of the facilities evaluated in the existing California Environmental Quality Act (CEQA) documents.

Casitas is seeking project funding from the Drinking Water State Revolving Fund (DWSRF) via the California State Water Resources Control Board (SWRCB). As such, in addition to CEQA documentation, supplemental environmental documentation is needed. Per direction from Casitas, we understand the

project is subject to DWSRF Tier I Environmental Package requirements, incorporated by reference herein.[1]

Scope of Work

Based on our understanding of the proposed project and our familiarity with the project area and the requirements of the DWSRF Environmental Package, we believe the appropriate level of CEQA documentation will be an IS-MND. In addition, the technical documentation will also address federal environmental cross-cutter regulations per DWSRF Tier I Environmental Package requirements. Rincon's scope of work includes a preliminary coordination task, during which Rincon staff will coordinate with SWRCB staff to confirm environmental documentation requirements. If SWRCB simplifies documentation requirements, we will reduce our scope and costs accordingly.

Given the limited detail in the description of physical improvements available to Rincon at this time, we reserve the right to request modifications to the following scope and costs pending full project details. Where possible, Rincon will leverage the previous environmental analyses completed for the Ojai Water System Improvements Project to streamline the environmental review.

Task 1 Preliminary Coordination

Rincon will coordinate with Casitas staff to confirm project objectives at a one-hour, virtual kickoff meeting. The kickoff meeting will allow Casitas and Rincon an opportunity to thoroughly discuss the project description, approach to environmental evaluation, and any concerns regarding the project. This step will allow the team to better focus the scope of the CEQA document and technical studies as well as supporting technical studies. Prior to this meeting, Rincon will identify key information and documents needed to complete the technical reports and CEQA document.

In addition, this task includes Rincon staff time to coordinate with SWRCB to discuss the environmental review schedule and confirm the technical documentation needed to address the Tier I Environmental Package requirements. For example, Rincon cultural resources staff will confirm SWRCB cultural resources staff's preferences related to the project's area of potential effects (APE) and recordation of potential built environment resources. If SWRCB staff streamline requirements and Rincon's scope of work can be simplified (e.g., if no recordation updates for built environment resources are necessary and/or if a stand-alone Biological Resources Assessment is not required), we will reduce our scope and costs accordingly for the following scope of work.

Task 2 Project Description

Working with Casitas staff, Rincon will prepare a detailed project description to inform the technical studies and CEQA document. Organization of this information is critical because it forms the basis for environmental evaluation under CEQA. The project description will focus on the proposed physical improvements and high-level operational changes proposed by the project, and will include figures to show the physical improvement areas. The project description will be based on information provided by Casitas.

[1] State Water Resources Control Board. 2024. "Drinking Water Environmental Package Instructions (Construction – Tier I)." https://www.waterboards.ca.gov/drinking_water/services/funding/documents/srf/dwsrf_policy/h4_dwsrf_application_const_environmental.pdf

Task 3 Technical Studies

Task 3.1 Biological Resources Assessment

Rincon will prepare a Biological Resources Assessment (BRA) letter report evaluating potential impacts to biological resources within the study area, which will include the proposed project footprint plus a 50-foot buffer. The BRA will be designed to support CEQA environmental review and meet the requirements of the DWSRF Tier I Environmental Package Requirements. Rincon staff will review the 2019 BRA prepared by Rincon for the Ojai Water System Improvements Project, particularly the discussions of areas where the proposed project's physical improvements are located, as part of the research conducted for the BRA letter report. Due to the time lapse since preparation of the 2019 BRA, this task includes new literature reviews and site visits at all the proposed project's physical improvement areas.

As part of this task, a Rincon biologist will conduct a literature review of various resources, including the California Natural Diversity Database and other published materials pertaining to biological resources at the site and in the region. Additionally, we will query the United States Fish and Wildlife Service (USFWS) Critical Habitat Portal and request an official Information for Planning and Consultation list, and review the California Native Plant Society's Inventory of Rare and Endangered Vascular Plants of California, California Department of Fish and Wildlife's (CDFW) Special Animals List, and relevant federal, state and local plans, ordinances, policies and regulations.

Upon completion of the literature review, a field survey will be conducted to compile a biological resources inventory, including a list of observed plant and wildlife species and descriptions of plant communities, wildlife habitats, and potential special-status species. During the field survey, the Rincon biologist will document observed plant and wildlife species and evaluate the site's potential to support regulated biological resources. In particular, the survey will focus on the presence/absence of suitable habitat for special-status species, potentially jurisdictional waters/wetlands, and protected trees.

Following the field survey, Rincon will prepare a letter report incorporating the results of the background literature review and field survey.

Task 3.2 Cultural Resources Assessment

The following scope of work will leverage the analyses previously conducted for the 2019 Ojai Water System Improvements Project IS-MND and the associated 2018 Cultural Resources Technical Report (2018 Cultural Report) and integrate recent federal guidance provided for similar projects in the region. Due to the time lapse since preparation of the 2018 Cultural Report, this task includes a new cultural resources records search and site visits at all of the proposed project's physical improvement areas in accordance with state and federal guidance.

The 2018 Cultural Report assessed the historical significance of the Ojai Water Distribution System within the context of the development of Ojai and concluded it did not appear to meet the criteria for listing on the California Register of Historical Resources (CRHR) or National Register of Historic Places (NRHP). However, recent experience and State Historic Preservation Officer (SHPO) guidance indicate it may be necessary to address the potential eligibility of the Casitas System and conduct a more detailed evaluation of the Ojai Water Distribution System. Under Task 1 Preliminary Coordination, Rincon will coordinate with SWRCB to confirm its recordation and documentation requirements. If the following scope of work can be simplified pending SWRCB feedback, Rincon will reduce our scope and costs accordingly.

Per DWSRF Tier I Environmental Package requirements, the proposed project will be subject to Section 106 of the National Historic Preservation Act (NHPA) with SWRCB acting as the lead federal

agency. The following scope of work has been developed to comply with Section 106 of the NHPA and to support preparation of the CEQA document.

The Cultural Resources Assessment will include the following components:

Area of Potential Effects Map. In accordance with the regulations of 36 Code of Federal Regulations 800.16(d), Rincon will delineate an Area of Potential Effects (APE) for the project. The APE will encompass resources in the area of the proposed project with potential for historical significance which should be evaluated for NRHP eligibility and may be directly or indirectly affected by the project.

Cultural Resources Records Search. Rincon will conduct a California Historical Resources Information System records search of the project site and a 0.5-mile radius around it at the South Central Coastal Information Center (SCCIC) located at California State University, Fullerton. The primary purpose of the records search is to identify previously recorded cultural resources known to exist within or near the project site. In addition to the resource records and reports, an examination will be made of historical maps, the National Register of Historic Places, California Register of Historical Resources, Built Environment Resources Directory, Archaeological Determinations of Eligibility list, and the listing of California Historical Landmarks. The records search will also reveal the nature and extent of cultural resources work previously conducted in or near the project site. If the results of the records search have schedule or budget ramifications, they will be communicated to Casitas staff in a timely manner to allow effective project risk management.

Sacred Lands File Request and AB 52 Coordination. Casitas, as the lead agency, is required to undertake consultation pursuant to Assembly Bill 52 (AB 52) with California Native American Tribes traditionally and culturally affiliated with the project site. Rincon will contact the Native American Heritage Commission (NAHC) to request a Sacred Lands File (SLF) search. Rincon will also assist Casitas with consultation under AB 52 by preparing letter templates for those Tribes which have requested formal notification of projects under Public Resources Code Section 21080.3.1(b), a correspondence tracking sheet, and detailed instructions to ensure meaningful consultation with interested Native American Tribes can be completed in accordance with AB 52. Upon receipt of letters, Native American Tribes have 30 days to reply to a request for consultation under AB 52.

Section 106 Coordination. As the lead federal agency, DWSRF (on behalf of USEPA) is obligated to comply with Section 106 of the NHPA. In an effort to identify cultural resources potentially qualifying as historic properties with the potential to be affected by the project, Rincon will conduct Native American and interested party outreach. Rincon will send letters to California Native American groups included in the contact list provided by the NAHC as part of the SLF search. Additionally, Rincon will send letters via email to local individuals and organizations with potential knowledge of, or concerns with, historic-period cultural resources in the project vicinity. The Native American and local interested party outreach will include inquiries to Tribes, applicable local governments, and local historical groups regarding their knowledge of cultural resources in the immediate vicinity of the project site. Following initial inquiries, Rincon will allow two weeks for review, then follow-up by phone call and/or email if contacts were unresponsive. Up to two phone calls/emails will be conducted to document a "good faith" effort to follow-up. A contact log documenting these efforts will be attached to the report in an appendix alongside an example letter and all replies.

This initial Section 106 outreach scope is intended to support and inform the lead federal agency's Section 106 process, but does not constitute consultation under Section 106, which is typically implemented by the lead federal agency. If a Native American group or a local interested party request consultation under Section 106, Rincon recommends Casitas notify its DWSRF program contact immediately.

Cultural Resources Field Survey. Upon completion of the records search, Rincon will conduct a cultural resources field survey of the project site using a combination of pedestrian and windshield survey methods. The pedestrian survey will be completed using transects spaced at maximum intervals of 10 meters over all exposed ground surface. Transect accuracy will be maintained through use of a hand-held global positioning system unit. In addition, a windshield survey will be utilized in primarily paved, urbanized areas.

Cultural Resources Technical Report. Following completion of the tasks identified above, Rincon will prepare the Cultural Resources Technical Report. The report will include a brief project description, regulatory framework, all sources consulted, including the methods and results of the CHRIS records search, SLF search, desktop geoarchaeological review, archaeological survey, and recommendations for appropriate management. Finally, the report will address the proposed project's potential to affect historic properties in conformance with Section 106 of the NHPA. Rincon assumes a finding of No Historic Properties Affected. For the purposes of this scope of work, Rincon assumes the technical report will include a findings of effect section and will not require a separate document. Rincon will file a copy of the final report with the SCCIC.

Task 4 Initial Study-Mitigated Negative Declaration

Task 4.1 Administrative Draft IS-MND

Rincon will prepare an Administrative Draft (internal review) IS-MND for the proposed project. The CEQA analysis will discuss existing conditions, thresholds of significance for CEQA, methodology for impact assessments, project-specific impacts and mitigation measures, cumulative impacts, and residual impacts for the proposed project. The focus of the analysis will be to avoid or minimize potential impacts and to propose appropriate mitigation where potential impacts may occur. The IS-MND will incorporate the results of the technical studies prepared under Task 3, and additional information will be gathered from the various online databases and other documents on file with Casitas and other agencies. Preparation of the IS-MND will also include a paleontological resources records search and quantitative analysis of air quality, greenhouse gas emissions, and noise impacts.

The IS-MND will also contain a federal cross-cutters section to address DWSRF Tier I Environmental Package requirements.

Task 4.2 Public Review Draft IS-MND

Rincon will respond to comments from Casitas on the Administrative Draft IS-MND and incorporate revisions as needed. For the purposes of CEQA, Rincon will also prepare a Notice of Intent (NOI) to Adopt the MND for submittal to the Ventura County Clerk and State Clearinghouse, as well as a Notice of Completion and Summary Form for submittal to the State Clearinghouse. Rincon will also provide an electronic version (PDF) of the Public Review Draft IS-MND for posting on Casitas' website and with the State Clearinghouse. Rincon will file the NOI with the Ventura County Clerk and State Clearinghouse. If needed, Rincon can also assist in developing a mailing list for Casitas to use in distributing the NOI to responsible/trustee agencies and interested parties.

Task 4.3 Responses to Comments and Final IS-MND

Upon receipt of public comments on the Draft IS-MND, Rincon will prepare and submit an electronic copy of the draft responses to comments for review by Casitas, including any added or substantially revised sections of the Draft IS-MND which may be necessary. The Final IS-MND will also include a mitigation monitoring and reporting program (MMRP) in accordance with the Casitas' requirements. The MMRP will be provided in an easily digestible format. Essentially, this plan will take the form of a

detailed table compiling all the mitigation measures and information necessary to monitor compliance with each measure. Rincon will provide an electronic version (PDF) of the Final IS-MND.

Rincon will complete a Notice of Determination (NOD) form for filing with the Ventura County Clerk and State Clearinghouse upon adoption of the IS-MND and project approval. Rincon will file the NOD with the Ventura County Clerk and State Clearinghouse.

Task 5 Project Management

Under Task 5, Rincon will provide overall project management and coordination. We anticipate up to three coordination calls (estimated at 30 minutes each) with Casitas will occur to ensure regular communication and status updates.

This task also includes up to two hours of Rincon's Project Manager's time to respond to questions from SWRCB after submittal of environmental documentation. Additional rounds of revision or follow-up coordination can be added under separate scope and cost, as needed.

Assumptions

The following assumptions are included in this scope of work and associated cost estimate.

General

- Casitas will provide GIS files of the work areas, including staging/laydown areas and access routes.
- No access issues will be encountered during any field surveys.
- Rincon is not responsible for delays due to weather, site conditions (e.g., prohibited access, flooding, fire, safety), or other conditions out of Rincon's control.
- Rincon's attendance at any additional public meetings or hearings can be added to this scope on a time-and-materials basis, if requested.
- This scope of work does not include preparation of the Environmental Package portion of the DWSRF Financial Assistance Package.

Project Deliverables

- Rincon will respond to one round of comments from Casitas on each project deliverable, to be provided as a consolidated set of comments in editable electronic format (i.e., as tracked changes in Word). All comments will clearly indicate the requested changes. If there are multiple reviewers, Casitas will be responsible for reconciling conflicting comments prior to sending to Rincon.
- An electronic version of each project deliverable will be provided; no hard copies will be provided.
- Addressing Casitas comments on any deliverable will not require additional, new analysis or field investigation.
- This scope of work and cost estimate does not include digital accessibility compliance. Accessible documents and/or printed copies can be provided under a separate scope and cost.

Project Description

- Sufficient information about the project is available to create a well-defined project description at the time of kickoff.

- No changes to the project description will occur once Casitas has reviewed and approved the project description. Substantial changes to the project description once Tasks 3 and 4 are underway may require a change order.

Biological Resources

- The biological study area will be limited to the construction footprint and 50-foot buffer.
- The field survey will be completed by one biologist in one 8-hour day, including mobilization and travel time.
- The identification of potential special-status species habitat will be based on a suitability analysis level only; the biological resources reconnaissance survey does not include definitive surveys for the presence or absence of a species. Protocol-level surveys, an aquatic resources delineation, and arborist survey are not included in this scope of work; if determined necessary during preparation of the BRA, such surveys can be provided under separate scope and cost.
- No listed species will be observed during the biological resources reconnaissance survey.
- Preparation of permit applications or technical studies related to species listed under the federal and/or state Endangered Species Acts or jurisdictional waters is not included in this scope of work. If it is determined listed species or jurisdictional waters would be affected by the project, the appropriate additional permit application(s) and technical studies can be prepared under a separate scope and cost.

Cultural Resources

- The APE will include the project's limits of work, inclusive of construction staging areas.
- The SCCIC records search cost will not exceed $1,200 and will be completed within approximately four to six weeks by Rincon staff.
- The NAHC will provide the SLF search results and contact list within four to six weeks of Rincon's request.
- As part of the AB 52 consultation notification, Casitas will send letters to all Tribes listed via email with read receipts requested and/or certified mail. This scope of work does not include direct mailing of any letters by Rincon to Tribal governments as part of the AB 52 process.
- Rincon will attend and facilitate up to one AB 52 consultation meeting to support consultation efforts. The meeting will be held via conference call, will be one hour in length, and will require one hour of preparation time, for a total of two hours.
- No tribal cultural resources will require formal documentation as a result of the AB 52 consultation efforts.
- The Native American and local interested party outreach included in this scope is meant for information gathering purposes and does not constitute formal government-to-government consultation pursuant to Section 106 of the NHPA.
- The survey will be conducted by one cultural resources specialist in the span of one six-hour day, including travel time, and will require two hours of coordination time, for a total of eight hours. No more than one acre will require surveying.
- No previously unknown cultural resources (inclusive of historic-era built resources) will be identified within the APE during the records search or pedestrian survey requiring recordation, updating, or evaluation for NRHP or CRHR eligibility. Should previously unknown cultural resources

be identified, additional work associated with their documentation and evaluation may be conducted under a cost amendment.

- No archaeological testing or evaluation will be conducted, and no archaeological artifacts, samples, or specimens will be collected.

IS-MND

- The Los Angeles County Natural History Museum paleontological resources records search will not exceed a cost of $300.
- No paleontological field survey will be conducted.
- Casitas will be responsible for distributing the NOI to a list of interested parties as well as to the general public in compliance with the requirements of CEQA Guidelines Section 15072, which may include distributing the NOI to a newspaper of general circulation, posting the NOI on and off the project site, or direct mailing of the NOI to owners and occupants of property contiguous to the project site.
- Rincon will file the NOD with the Ventura County Clerk and State Clearinghouse. Casitas will be responsible for payment of the NOD filing fees for the Ventura County Clerk and CDFW.
- Rincon will conduct a limited quantitative assessment of whether the project's vibration-generating construction activities would potentially impact adjacent historic-era buildings or structures using standard vibration screening distances. If vibration-generating construction equipment is proposed to be used within the standard vibration screening distances of historic-era buildings or structures, additional scope and budget may be needed to conduct more detailed quantitative analysis and develop site-specific mitigation.
- No supporting hydrogeologic analysis will be necessary to provide substantial evidence in support of the findings of the IS-MND with regard to project impacts to groundwater supplies.
- The transportation analysis for the IS-MND will utilize construction traffic estimates provided by Casitas along with standard construction traffic control measures. Additional traffic modeling will not be conducted as part of this scope of work.
- Computerized modeling to characterize hydrology, drainage patterns, and other existing physical conditions will not be conducted as part of the project. Rather, existing information including previously prepared maps and models will be utilized to the extent feasible.
- The project will receive minimal public and agency interest; as a result, 20 hours of time are allotted for response to public and agency comments. The actual level of effort required to respond will depend on the length, detail, and sophistication of the comments, in addition to the number of letters received. We reserve the right to reevaluate the effort level and request a scope amendment upon close of the public comment period.
- Casitas will be responsible for the payment of all filing fees.
- Rincon's attendance at public hearings/meetings for the project will not be required.
- Project management will be required over an approximately 6-month period, starting at Notice to Proceed, and Notice to Proceed will be given no later than January 2025.

Cost

For this project, Rincon is utilizing the fee schedule from our active on-call contract with Casitas dated June 12, 2024. Our on-call contract uses Rincon's January 2023 rates, which represent an eight to nine percent discount on our current 2024 rates.

As shown in **Error! Reference source not found.**, the estimated cost to complete this scope of work is **$91,455.** As noted throughout this proposal, if any federal cross-cutter requirements are streamlined by SWRCB in the coordination conducted under Task 1 and Rincon can simplify our scope of work, we will reduce our scope and costs accordingly.

Table 1 Cost Summary

Task		Estimated Cost
Task 1	**Preliminary Coordination**	$2,545.00
Task 2	**Project Description**	$4,007.00
Task 3	**Technical Studies**	
Task 3.1	Biological Resources Assessment	$14,993.00
Task 3.2	Cultural Resources Assessment	$17,060.00
Task 4	**Initial Study-Mitigated Negative Declaration**	
Task 4.1	Administrative Draft IS-MND	$29,565.00
Task 4.2	Public Review Draft IS-MND	$5,709.00
Task 4.3	Responses to Comments and Final IS-MND	$9,130.00
Task 5	**Project Management**	$8,506.00
Total		**$91,455.00**

Professional Services *– This cost estimate is based on Rincon's standard fee schedule and labor classifications. The above is provided as an estimate of Rincon's effort per task. Rincon may reallocate budget between staff and tasks, as long as the total contract price is not exceeded.*

Thank you for your consideration and for this opportunity to support your project. If you have any questions regarding this proposal, please contact Amanda Antonelli, Project Manager.

Sincerely,
Rincon Consultants, Inc.

Amanda Antonelli, MESM
Senior Environmental Planner/Project Manager
Phone: 805-947-4864
Email: aantonelli@rinconconsultants.com

Jennifer Haddow
Vice President
Phone: 805-644-4455
Email: jhaddow@rinconconsultants.com

Attachments

Attachment 1 Ojai Water System and Casitas Integration Project - Construction and Design Components

Attachment 1 Ojai Water System and Casitas Integration Project – Construction and Design Components

OWS/CMWD Integration Capital Improvement Plan - Alt 5B Recommendation		
Item	**Project**	**Description**
1	Private Drive Pipeline Installation	Finish pipeline work removed from Fairview/Foothill contract
2	Running Ridge Design Phase 2	Arbolada Pump Station design and update of existing Running Ridge plans
3	Foothill Road Pipeline Installation	Finish pipeline work removed from Fairview/Foothill contract
4	Running Ridge Construction Phase 2	Construct new pump station, transition from existing PS to new, abandon Running Ridge tanks and demo Valley View PS
5	OWS Wellfield Chloramine Conversion Design	Design to convert the OWS Wellfield from chlorine to chloramines
6	OWS Wellfield Chloramine Conversion Construction	Conversion of the OWS Wellfield from chlorine to chloramines
7	Ojai East Balancing Tank Design	Design of redundant tank at Ojai East
8	Ojai East Balancing Tank Construction	Construction of redundant 1 MG tank at Ojai East
9	Ojai East Tank 1 Rehab	Rehab of existing 3 MG tank
10	Demo Arbolada Tank	Demolish and remove the existing tank and level hill.

Provided to Rincon by Casitas via email on October 28, 2024

CASITAS MUNICIPAL WATER DISTRICT
MEMORANDUM

TO: BOARD OF DIRECTORS

FROM: MICHAEL FLOOD, GENERAL MANAGER

SUBJECT: HYDROLOGIC STATUS REPORT FOR OCTOBER 2024

DATE: DECEMBER 11, 2024

RECOMMENDATION:

This item is presented for information only and no action is required. Data are provisional and subject to revision.

DISCUSSION:

Rainfall Data

	Casitas Dam	Matilija Dam	Thacher School
This Month	0.01”	0.00”	0.00”
Water Year (WY: Oct 01 – Sep 30)	0.01”	0.00”	0.00”
Average station rainfall to date	0.53”	0.57”	0.48”

Ojai Water System Data

Wellfield production	167.42 AF
Surface water supplement	0.00 AF
Static depth to water surface – Mutual #6	92.12 feet
Change in static level from previous month	-2.02 feet

Robles Fish Passage and Diversion Facility Diversion Data

Diversions this month	0.00 AF
Diversion days this month	0
Total Diversions WY to date	0.00 AF
Diversion days this WY	0

Casitas Reservoir Data

Water surface elevation as of end of month	563.44 feet
Water storage last month	230,167 AF
Water storage as of end of month	228,420 AF
Net change in storage	- 1,747 AF
Change in storage from same month last year	+ 58,200 AF

AF = Acre-feet AMSL = Above mean sea level WY = Water year

CASITAS MUNICIPAL WATER DISTRICT
COMMUNITY FACILITIES DISTRICT NO. 2013-1 (OJAI)

SPECIAL TAX AND BOND ACCOUNTABILITY REPORT

The purpose of this report is to comply with the provisions of the Local Agency Special Tax and Bond Accountability Act (the "Accountability Act"). According to Senate Bill ("SB") 165, any local special tax measure that is subject to voter approval on or after January 1, 2001 that would provide for the imposition of a special tax by a local agency shall require the chief fiscal officer of the levying local agency to file an annual Special Tax and Bond Accountability Report ("Accountability Report") with its governing body no later than January 1, 2002, and at least once a year thereafter, meeting the requirements of the Accountability Act. The Accountability Report shall contain a description of the following:

- The amount of funds collected and expended.
- The status of any project required or authorized to be funded as identified in subdivision (a) of Section 50075.1 and Article 1.5, Section 53410.

In compliance with the required Accountability Report the following is submitted:

The Casitas Municipal Water District Community Facilities District No. 2013-1 (Ojai) ("CFD No. 2013-1") issued $39,910,000 in bonds in May 2017, consisting of $100,000 aggregate principal amount of its Series A Special Tax Bonds and $39,810,000 aggregate principal amount of its Series B Special Tax Bonds. In November 2019, CFD No. 2013-1 issued $12,265,000 aggregate principal amount of Series C Special Tax Bonds. The Series A Special Tax Bonds, Series B Special Tax Bonds, and the Series C Special Tax Bonds are collectively referred to herein as the "Bonds". The Bonds have been issued to finance the acquisition of water facilities serving property owners within CFD No. 2013-1, and the construction of certain eligible infrastructure improvements to these water facilities needed to serve the property owners within CFD No. 2013-1, both as described in Resolution No. 13-12 adopted by the Casitas Municipal Water District on March 13, 2013.

Separate accounts have been established with a third-party trustee to administer the receipt and subsequent disbursement of the bond proceeds for Casitas Municipal Water District Community Facilities District No. 2013-1 (Ojai). A summary sheet showing the deposit of bond proceeds as well as all subsequent disbursements made during the reporting period (November 1, 2023 through October 31, 2024) is attached as part of this report.

On June 7, 2017 a payment to the Golden State Water Company in the amount of $34,481,628 was paid with monies in the Improvement Funds for the acquisition of water facilities serving property owners within CFD No. 2013-1.

Additionally, as of October 31, 2024, Casitas Municipal Water District staff had processed fifty-one (51) requisitions, resulting in the Casitas Municipal Water District being reimbursed a total of $22,197,864 from the Improvement Funds for improvements to the water meter installation and pipeline repair at the intersection of Mallory Way and Eucalyptus Street, applicable water meter costs, Ojai system master plan, running ridge hydraulic improvements, signal booster zone hydraulic improvements, Casitas-Ojai system integration, Heidelberger pump plant retaining wall, valve and appurtenance replacement at Ventura Street, Mutual and San Antonio well rehabilitation and replacement, Mutual well #7 drilling and equipping, Mutual building improvements, and San Antonio building improvements and wellfield variable frequency drives (VFDs). Pipeline has been replaced at Sunset Place, Cuyama, Palomar and El Paseo roads, Fairview, Grand Avenue, Emily Street, south San Antonio and Crestview Drive, Ojai Avenue, and Grand Ave and Lion Street. Design work has also been done for the Pleasant Avenue, Daly Road pipeline.

CFD No. 2013-1 special taxes were levied in fiscal year 2023-2024 in the amount of $2,952,268. These special taxes were used to pay debt service on the Bonds, administrative expenses of CFD No. 2013-1, and directly for authorized public infrastructure.

CASITAS MUNICIPAL WATER DISTRICT
COMMUNITY FACILITIES DISTRICT NO. 2013-1 (OJAI)
SERIES 2017 & SERIES 2019 SPECIAL TAX BONDS

SB 165 FUND SUMMARY

Series 2017 Funds & Accounts	*Bond Proceeds (Deposited on 5/31/17)*	*Funds Previously Accrued*	*Funds Previously Expended*	*Ending Balance as of 10/31/23*	*Funds Accrued (11/1/23 through 10/31/24)*	*Funds Expended (11/1/23 through 10/31/24)*	*Ending Balance as of 10/31/24*
Improvement Fund	$42,658,223.98	$219,345.97	($42,877,569.78)	$0.17	$0.00	($0.17)	$0.00
Special Tax Fund	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
Administrative Expense Fund	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
Costs of Issuance Fund [1]	$326,000.00	$0.00	($326,000.00)	$0.00	$0.00	$0.00	$0.00
Bond Fund	$466,447.67	$12,661,743.64	($13,126,778.25)	$1,413.06	$2,241,919.28	($2,241,487.50)	$1,844.84
Reserve Fund [2]	$0.00	$2,624,671.88	$0.00	$2,624,671.88	$0.00	$0.00	$2,624,671.88
Special Tax Prepayments Account	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
Rebate Fund	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
Grand Total	$43,450,671.65	$15,505,761.49	($56,330,348.03)	$2,626,085.11	$2,241,919.28	($2,241,487.67)	$2,626,516.72

Series 2019 Funds & Accounts	*Bond Proceeds (Deposited on 11/5/19)*	*Funds Previously Accrued*	*Funds Previously Expended*	*Ending Balance as of 10/31/23*	*Funds Accrued (11/1/23 through 10/31/24)*	*Funds Expended (11/1/23 through 10/31/24)*	*Ending Balance as of 10/31/24*
Improvement Fund	$13,570,000.00	$207,889.60	($12,759,778.25)	$1,018,111.35	$24,218.32	($1,042,144.16)	$185.51
Costs of Issuance Fund [3]	$195,465.66	$31.30	($195,496.96)	$0.00	$0.00	$0.00	$0.00
Reserve Fund [4]	$0.00	$735,607.50	$0.00	$735,607.50	$0.00	$0.00	$735,607.50
Bonds Proceeds Account	$0.00	$2,426,538.92	($2,425,801.10)	$737.82	$640,318.70	($639,750.00)	$1,306.52
Grand Total	$13,765,465.66	$3,370,067.32	($15,381,076.31)	$1,754,456.67	$664,537.02	($1,681,894.16)	$737,099.53

Notes:

[1] Costs of issuance included (i) $326,000.00 deposited into Costs of Issuance Fund, (ii) discount of $214,316.70 retained by underwriter, (iii) payment of $415,883.85 for bond insurance, (iv) payment of $56,430.45 for surety bond, less (v) original issue premium of $4,227,302.65.

[2] Reserve Fund balance is based on market value and represents the Municipal Bond Debt Service Reserve Insurance Policy in the face amount of $2,624,671.88 issued by Build America Mutual Assurance Company. The Reserve Policy constitutes a Credit Facility under the Fiscal Agent Agreement and is being issued in the amount of the Reserve Requirement.

[3] Costs of issuance included (i) $195,465.66 deposited into Costs of Issuance Fund, (ii) discount of $82,788.75 retained by underwriter, (iii) payment of $112,589.18 for bond insurance, (iv) payment of $15,815.56 for surety bond, less (v) original issue premium of $1,711,659.15.

[4] Reserve Fund balance is based on market value and represents the Municipal Bond Debt Service Reserve Insurance Policy in the face amount of $735,607.50 issued by Build America Mutual Assurance Company. The Reserve Policy constitutes a Credit Facility under the Fiscal Agent Agreement and is being issued in the amount of the Reserve Requirement.

Casitas Municipal Water District
State Water Project - Interconnect Project Costs
As of 11/30/24

Project No:	Project Name:	Costs paid to date	Encumbered	Total Encumbered & Cost To Date
378	State Water Interconnect - Calleguas to Casitas	123,668	-	123,668
527	State Water Interconnect - Carpinteria to Casitas	3,773,666	746,179	4,519,846
606	State Water Interconnect - Ventura to Casitas	249,242	-	249,242
	Project(s) Cost To Date:	4,146,576	746,179	4,892,756

CASITAS MUNICIPAL WATER DISTRICT
TREASURER'S MONTHLY REPORT OF INVESTMENTS
11/30/24

Type of Invest	Institution	CUSIP	Date of Maturity	Original Cost	Current Mkt Value	Rate of Interest	Date of Deposit	% of Portfolio	Days to Maturity
*TB	Federal Home Loan Bank	3133ERFJ5	5/20/2027	$848,530	$855,704	4.500%	6/18/2024	8.63%	890
*TB	Federal Home Loan Bank	3130A5VW6	7/10/2025	$1,025,110	$990,110	2.700%	5/10/2017	9.99%	220
*TB	US Treasury Note	912797KA4	2/20/2025	$708,385	$717,924	4.460%	8/27/2024	7.24%	80
*TB	Farmer MAC	31315PYF0	5/2/2028	$512,355	$477,950	2.925%	11/20/2017	4.82%	1232
*TB	Federal Farm CR Bank	31331VWN2	4/13/2026	$940,311	$725,289	5.400%	5/9/2016	7.31%	493
*TB	Farmer MAC	3133EEPH7	2/12/2029	$480,251	$451,222	2.710%	11/20/2017	4.55%	1512
*TB	Federal National Assn	3135G0K36	4/24/2026	$2,532,940	$2,432,050	2.125%	7/6/2010	24.53%	504
*TB	US Treasury Note	912797MG9	8/7/2025	$1,056,945	$1,068,452	4.000%	9/4/2024	10.78%	247
*TB	US Treasury Note	912797LC9	10/31/2026	$728,888	$728,971	4.125%	11/1/2024	7.35%	690
*TB	US Treasury Note	9128286F2	2/28/2026	$1,471,347	$1,467,780	2.540%	9/9/2024	14.80%	448
	Total in Gov't Sec. (11-00-1055-00&1065)			**$10,305,062**	**$9,915,451**			**99.96%**	
	Total Certificates of Deposit:			**$0**	**$0**			**0.00%**	
**	**LAIF as of 11/30/2024: (11-00-1050-00)**		N/A	**$496**	**$496**	3.36%	Estimated	**0.00%**	
***	**COVI as of 11/30/2024: (11-00-1060-00)**		N/A	**$3,150**	**$3,150**	3.59%	Estimated	**0.03%**	
	TOTAL FUNDS INVESTED			**$10,308,708**	**$9,919,097**			**100.00%**	
	Total Funds Invested last report			$10,310,713	$9,929,097				
	Total Funds Invested 1 Yr. Ago			$9,884,034	$9,037,597				
****	**CASH IN BANK (11-00-1000-00) EST.**			**$3,547,286**	**$3,547,286**				
	CASH IN Custody Money Market			**$68,997**	**$68,997**				
	TOTAL CASH & INVESTMENTS			**$13,924,991**	**$13,535,381**				
	TOTAL CASH & INVESTMENTS 1 YR AGO			$13,365,387	$12,518,950				

*CD CD - Certificate of Deposit
*TB TB - Federal Treasury Bonds or Bills
** Local Agency Investment Fund
*** County of Ventura Investment Fund
Estimated interest rate, actual not due at present time.
**** Cash in bank

No investments were made pursuant to subdivision (i) of Section 53601, Section 53601.1 and subdivision (i) Section 53635 of the Government Code.
All investments were made in accordance with the Treasurer's annual statement of investment policy.

Consumption Report

Water Sales FY 2024-2025 (Acre-Feet)														***Month to Date***	
														2024/ 2025	**2023/ 2024**
Classification		**Jul**	**Aug**	**Sep**	**Oct**	**Nov**	**Dec**	**Jan**	**Feb**	**Mar**	**Apr**	**May**	**Jun**	**Total**	**Total**
AD	Ag-Domestic	332	346	291	267	-	-	-	-	-	-	-	-	1,237	955
MAD	Ag-Domestic Multi	12	13	12	12	-	-	-	-	-	-	-	-	49	34
AG	Ag	176	208	179	166	-	-	-	-	-	-	-	-	729	597
C	Commercial	89	111	81	71	-	-	-	-	-	-	-	-	352	303
DI	Interdepartmental	25	20	17	15	-	-	-	-	-	-	-	-	77	74
F	Fire	0	0	0	-	-	-	-	-	-	-	-	-	0	0
I	Industrial	1	3	2	2	-	-	-	-	-	-	-	-	8	8
OT	Other	27	35	24	26	-	-	-	-	-	-	-	-	112	92
R	Residential	232	266	220	216	-	-	-	-	-	-	-	-	934	795
RM	Residential Multi	30	34	29	29	-	-	-	-	-	-	-	-	122	114
RS - P	Resale Pumped	11	18	18	20	-	-	-	-	-	-	-	-	67	23
RS - G	Resale Gravity	478	525	508	300	-	-	-	-	-	-	-	-	1,811	271
TE	Temporary	0	1	2	2	-	-	-	-	-	-	-	-	6	14
Total		1,416	1,580	1,383	1,124	-	-	-	-	-	-	-	-	**5,504**	**3,278**
CMWD		1,219	1,350	1,192	934	-	-	-	-	-	-	-	-	4,695	2,650
OJAI		197	230	192	190	-	-	-	-	-	-	-	-	809	628
Total 2023 / 2024		906	744	759	869	736	491	207	280	300	332	576	795	**N/A**	**6,994**

Casitas Municipal Water District
Adjudication Charge Summary Report

	FY2021	FY2022	FY2023	FY2024	Total
Revenue	(584,095)	(580,963)	(576,000)	(571,394)	(2,312,453)
Expenses		-	-	-	-
Legal	168,555	274,074	103,336	70,698	616,663
Other Pro Fees	125,175	339,276	44,340	73,749	582,540
Bank Fees/ Bad Debt	130	366	-	-	496
Net Total	**(290,234)**	**32,752**	**(428,324)**	**(426,948)**	**(1,112,754)**
Cash Collected	484,014	571,777	527,845	677,295	2,260,930
Cash Disbursed	(251,637)	(642,205)	(139,074)	(176,934)	(1,209,850)
Accounts Payable	(42,224)	23,699	11,827	(63,764)	(70,462)
Accounts Receivable	100,081	13,977	27,726	(9,649)	132,135
Net Total	**290,234**	**(32,752)**	**428,324**	**426,948**	**1,112,754**

	2024 July	2024 August	2024 September	2024 October	2024 November	2024 December	2025 January	2025 February	2025 March	2025 April	2025 May	2025 June	**Total to date**
Revenue	(47,283)	(46,754)	(47,442)	(47,276)	223	-	-	-	-	-	-	-	(2,500,985)
Expenses													
Legal	-	-	-	10,768	-	-	-	-	-	-	-	-	627,431
Other Pro Fees	(6,527)	23,550	57,973	51,387	54,678	-	-	-	-	-	-	-	763,602
Bank Fees/ Bad Debt	-	-	-	-	-	-	-	-	-	-	-	-	496
Net Total	(53,811)	(23,204)	10,532	14,880	54,901	-	-	-	-	-	-	-	(1,109,457)
Cash Collected	38,940	85,112	26,249	49,917	63,492	1,841	-	-	-	-	-	-	2,526,480
Cash Disbursed	(11,740)	(23,550)	(79,953)	(62,156)	(54,678)	-	-	-	-	-	-	-	(1,441,926)
Accounts Payable	70,462	-	(0)	-	-	-	-	-	-	-	-	-	0
Accounts Receivable	(43,850)	(38,357)	43,172	(2,641)	(63,714)	(1,841)	-	-	-	-	-	-	24,904
Net Total	53,811	23,204	(10,532)	(14,880)	(54,901)	-	-	-	-	-	-	-	1,109,457
Note: Data as of 12/04/2024	-	(0.00)	(0.00)	(0.00)	-	-	-	-	-	-	-	-	1,084,553