



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 93022
www.casitaswater.org

Join Zoom Meeting

<https://us06web.zoom.us/j/91094478837?pwd=VnNOQTZyQVk4K2pnaWpjYVI1TkpRdz09>
Meeting ID: 910 9447 8837 Passcode: 736519

To join by phone, please call (888) 788-0099 or (877) 853-5247
Enter Meeting ID: 984 1485 4813# Passcode: 757052#

September 10, 2025 @ 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 August 27, 2025 Board Meeting.
[8 27 2025 Min.pdf](#)

7. ACTION ITEMS

7.a Resolution Adopting the Initial Study - Mitigated Negative Declaration and the Mitigation, Monitoring and Reporting Program (MMRP) for the Casitas and Ojai Water System Consolidation dated September 2, 2025.
[Board Memo_CEQA_20250910.pdf](#)
[CEQA Resolution Casitas-OWS Consolidation.pdf](#)
[Casitas-Ojai Consolidation Draft Final IS-MND.pdf](#)
[Responses to Comments on the Draft IS-MND.pdf](#)
[Mitigation Monitoring and Reporting Program.pdf](#)

8. INFORMATION ITEMS

8.a State Water Project Intertie Report.
[SWP Intertie Project Cost 8-31-25.pdf](#)

8.b Investment Report.
[Investment Report FY2026 August.pdf](#)

8.c Consumption Report.
[Consumption 2025-2026.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. 19ATCP01176.

13. ADJOURNMENT

CASITAS MUNICIPAL WATER DISTRICT
General Fund Check Authorization
Checks Dated 08/21/25 - 09/03/25
Presented to the Board of Directors For Approval September 10, 2025

Check	Payee		Description	Amount
001391	Payables Fund Account	# 9759651478	Accounts Payable Batch 082725	\$ 187,530.57
001393	Payables Fund Account	# 9759651478	Accounts Payable Batch 090325	\$ 518,615.85
				<u>\$ 706,146.42</u>
001392	Payroll Fund Account	# 9469730919	Estimated Payroll 09/18/25	\$ 300,000.00
				<u>\$ 1,006,146.42</u>

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,
001391-001393
have been duly audited is hereby certified as correct.



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.

001391	A/P Checks:	056509-056567
	A/P Draft	001256-001258
	Voids:	
	056511 - Amazon Capital Services - Continuation of detail of check #056510	
	056546 - Meiners Oaks Ace Hardware - Continuation of detail of check #56545	
001393	A/P Checks:	056568-056611
	A/P Draft	001259-001268
	Voids:	



Janyne Brown, Chief Financial Officer

CERTIFICATION

Payroll disbursements for the pay period ending 08/30/25

Pay Date 09/04/25

have been duly audited and are
hereby certified as correct.

Signed: Janyne Brown

Janyne Brown

VENDOR I.D.	NAME	STATUS	CHECK DATE	INVOICE AMOUNT	DISCOUNT	CHECK NO	CHECK STATUS	CHECK AMOUNT
C-CHECK	VOID CHECK	V	8/27/2025			056511		
C-CHECK	VOID CHECK	V	8/27/2025			056546		

* * 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:	2	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:	2	0.00	0.00	0.00
BANK: TOTALS:	2	0.00	0.00	0.00

VENDOR I.D.	NAME	STATUS	CHECK DATE	INVOICE AMOUNT	DISCOUNT	CHECK NO	CHECK STATUS	CHECK AMOUNT
01483	CORVEL CORPORATION							
I-082625-CMWD	Corvel Claims 08/19-08/25/25	D	8/27/2025	501.50		001256		501.50
06170	Multi Service Technilogy Solut							
I-09943481	Acetylene Welding Kit & Solid	D	8/27/2025	465.37		001257		
I-3aca3753	Rtcht Tie Down - MAINT	D	8/27/2025	32.30		001257		497.67
04684	Univar Solutions USA Inc.							
I-53239441	Hydrochloric Acid 15%	D	8/27/2025	1,654.65		001258		
I-53242269	Sod Hypo 12.5	D	8/27/2025	1,113.29		001258		2,767.94
01483	CORVEL CORPORATION							
I-090225-CMWD	Corvel Claims 08/26-09/01/25	D	9/03/2025	987.19		001259		987.19
06351	EMERSON LLLP (51-0432217)							
I-31044006	Rosemount Coplanar Transmitter	D	9/03/2025	2,677.72		001260		2,677.72
00131	JCI JONES CHEMICALS, INC							
I-976887	Chlorine - TP,CM976894	D	9/03/2025	5,474.44		001261		5,474.44
00124	ICMA RETIREMENT TRUST - 457							
I-DCI202509022460	DEFERRED COMP FLAT	D	9/03/2025	2,678.85		001262		
I-DI%202509022460	DEFERRED COMP PERCENT	D	9/03/2025	399.47		001262		3,078.32
00128	INTERNAL REVENUE SERVICE							
C-T1 202509032461	Federal Withholding	D	9/03/2025	17.88CR		001263		
C-T3 202509032461	SS Withholding	D	9/03/2025	62.00CR		001263		
C-T4 202509032461	Medicare Withholding	D	9/03/2025	14.50CR		001263		
I-T1 202509022460	Federal Withholding	D	9/03/2025	52,333.55		001263		
I-T3 202509022460	SS Withholding	D	9/03/2025	56,138.96		001263		
I-T4 202509022460	Medicare Withholding	D	9/03/2025	13,764.35		001263		122,142.48
00985	NATIONWIDE RETIREMENT SOLUTION							
I-CUN202509022460	457 CATCH UP	D	9/03/2025	1,091.69		001264		
I-DCN202509022460	DEFERRED COMP FLAT	D	9/03/2025	8,953.24		001264		
I-DN%202509022460	DEFERRED COMP PERCENT	D	9/03/2025	1,921.43		001264		11,966.36
00187	CALPERS							
C-PER202509032461	PERS EMPLOYEE PORTION	D	9/03/2025	30.73CR		001265		
C-PRR202509032461	PERS EMPLOYER PORTION	D	9/03/2025	53.80CR		001265		
I-PBB202509022460	PERS BUY BACK	D	9/03/2025	130.46		001265		
I-PEB202509022460	PEPRA EMPLOYEES PORTION	D	9/03/2025	15,676.62		001265		
I-PEM202509022460	PERS EMPLOYEE PORTION MGMT	D	9/03/2025	2,155.66		001265		
I-PER202509022460	PERS EMPLOYEE PORTION	D	9/03/2025	7,212.08		001265		
I-PRB202509022460	PEBRA EMPLOYER PORTION	D	9/03/2025	16,101.41		001265		
I-PRR202509022460	PERS EMPLOYER PORTION	D	9/03/2025	14,557.12		001265		55,748.82

VENDOR I.D.	NAME	STATUS	CHECK DATE	INVOICE AMOUNT	DISCOUNT	CHECK NO	CHECK STATUS	CHECK AMOUNT
00180	S.E.I.U. - LOCAL 721							
C-COP202509032461	SEIU 721 COPE	D	9/03/2025	2.00CR		001266		
C-UND202509032461	UNION DUES	D	9/03/2025	16.75CR		001266		
I-COP202509022460	SEIU 721 COPE	D	9/03/2025	14.50		001266		
I-UND202509022460	UNION DUES	D	9/03/2025	939.50		001266		935.25
00049	STATE OF CALIFORNIA							
C-SDI202509032461	CASDI Withholding	D	9/03/2025	5.10CR		001267		
I-SDI202509022460	CASDI Withholding	D	9/03/2025	2,997.46		001267		
I-T2 202509022460	STATE WITHHOLDING (CA)	D	9/03/2025	20,115.30		001267		23,107.66
05790	STATE OF OREGON							
I-OST202509022460	OR STATE TRANSIT TAX	D	9/03/2025	7.29		001268		
I-T2 202509022460	STATE WITHHOLDING (OR)	D	9/03/2025	546.93		001268		554.22
02587	A&M LAWNMOWER SHOP							
I-55582	Turn Up Carb - MAINT	R	8/27/2025	45.00		056509		45.00
03044	Amazon Capital Services							
C-1KYD-C7G6-9V4D	Pen CR - LCRA	R	8/27/2025	16.93CR		056510		
I-14TV-4KCP-CX19	HDMI Cables - WP	R	8/27/2025	54.97		056510		
I-179T-CDRP-P94W	Fule Tank Rear - LCRA	R	8/27/2025	128.59		056510		
I-1CQY-4W97-J6Q9	Spray Nozzle - MAINT	R	8/27/2025	46.80		056510		
I-1DCR-CYNX-1Q4X	Glue Traps - MAINT	R	8/27/2025	158.68		056510		
I-1FNQ-T34R-N6T3	Safety Vest - LCRA	R	8/27/2025	27.76		056510		
I-1FTK-KYCC-3XT7	Disconnect Tool Kit - LCRA	R	8/27/2025	40.74		056510		
I-1HDW-YT1Y-FJ46	High Pressure Pump & Hose - UT	R	8/27/2025	849.64		056510		
I-1JYF-XLVK-GHRX	Office Supplies - LCRA	R	8/27/2025	49.70		056510		
I-1L6H-9KFI-PX3T	BBQ Grills & Fire Rings - LCRA	R	8/27/2025	7,876.05		056510		
I-1M9Y-P4QM-1JGF	Ridged Pipe Bender - TP	R	8/27/2025	225.21		056510		
I-1NLJ-6PNJ-9QX6	Outdoor Barn Light - WP	R	8/27/2025	116.89		056510		
I-1QHT-VKFQ-1QJJ	Oil Cleanup Absorber - LCRA	R	8/27/2025	193.04		056510		
I-1T3V-RD4N-J7P9	Pressure Washer Tip Nozzle - M	R	8/27/2025	115.80		056510		
I-1TKP-CPMV-44MV	Power Cord Extension - IT	R	8/27/2025	18.18		056510		
I-1TTT-3H6F-4R1T	Brush Plate Cable - WP	R	8/27/2025	9.43		056510		
I-1XGK-DWHR-C7L1	Jacket - PL	R	8/27/2025	139.41		056510		
I-1XJ4-TDTC-C34M	Fire Extinguisher - O&M	R	8/27/2025	52.54		056510		10,086.50
00836	AMERICAN RED CROSS							
I-22930675	Boodborne Pathogens Training	R	8/27/2025	38.00		056512		38.00
00014	AQUA-FLO SUPPLY							
I-SI2590179	Pop-U[Rotor & Solenoid Assemb	R	8/27/2025	423.95		056513		
I-SI2591822	Adapter, Couplings & Ball Valv	R	8/27/2025	263.16		056513		
I-SI2593621	2" IPS Metal Bolted Coupling	R	8/27/2025	296.91		056513		
I-SI2593622	Brass Nipple - PL	R	8/27/2025	387.20		056513		
I-SI2596581	Loppers & Wood Handle Blade	R	8/27/2025	145.73		056513		
I-SI2597380	2" Threaded Galvanized Plug	R	8/27/2025	8.81		056513		
I-SI2598702	40 PVC Coupling - EM	R	8/27/2025	5.38		056513		1,531.14

VENDOR SET: 01 Casitas Municipal Water D

BANK: AP ACCOUNTS PAYABLE

DATE RANGE: 8/21/2025 THRU 9/03/2025

VENDOR I.D.	NAME	STATUS	CHECK DATE	INVOICE AMOUNT	DISCOUNT	CHECK NO	CHECK STATUS	CHECK AMOUNT
01666 I-000023977702	AT & T Acct#9391062398	R	8/27/2025	367.70		056514		367.70
03429 I-0238326012	AT&T Acct#8310014476685	R	8/27/2025	2,665.78		056515		2,665.78
00030 I-1901016890 I-1901017012	B&R TOOL AND SUPPLY CO Ice Hardened Kit & Water Pump 14 & 18" Pipe Wrench - PL	R R	8/27/2025 8/27/2025	601.47 415.49		056516 056516		1,016.96
06410 I-01-00180067	Yesenia Bello Day Use Refund - LCRA	R	8/27/2025	28.00		056517		28.00
05025 C-9778120 I-9800134	Best Buy Business Advantage Ac Roku Stick Return - PL 128 GB, 64GM USB - IT	R R	8/27/2025 8/27/2025	32.76CR 38.20		056518 056518		5.44
06174 I-77850891-00	BFS Group of California LLC Red Wood Rough Cut - MAINT	R	8/27/2025	5,642.66		056519		5,642.66
04111 I-BU01821728	Roadpost, Inc. Sat Phone Service - TP	R	8/27/2025	77.25		056520		77.25
05887 I-0029927-IN I-0029928-IN I-0029929-IN I-0029930-IN I-0029977-IN	C.D. Lyon, Inc Upper Intake Valve Tool - TP Shop Weld 6" Supports - EM Upper Intake Vavle Tool - TP Weld 6" Conduit Support - EM Ave#2 PP - EM	R R R R R	8/27/2025 8/27/2025 8/27/2025 8/27/2025 8/27/2025	786.14 925.04 5,142.16 1,861.28 536.45		056521 056521 056521 056521 056521		9,251.07
05995 I-41621899	Canon Financial Services Copier Rental - ADM	R	8/27/2025	233.11		056522		233.11
00055 I-001680	CASITAS BOAT RENTALS Boat Rental - FISH/LAB	R	8/27/2025	210.00		056523		210.00
06004 I-OJ035647 I-OJ035788	Catalina Paints Masking Tape - LCRA Blades & Cartridge Prefilter	R R	8/27/2025 8/27/2025	39.77 51.73		056524 056524		91.50
02480 I-2507135	David Taussig & Associates, In D25-00115CFD Tax Admin	R	8/27/2025	700.00		056525		700.00

VENDOR SET: 01 Casitas Municipal Water D

BANK: AP ACCOUNTS PAYABLE

DATE RANGE: 8/21/2025 THRU 9/03/2025

VENDOR I.D.	NAME	STATUS	CHECK DATE	INVOICE AMOUNT	DISCOUNT	CHECK NO	CHECK STATUS	CHECK AMOUNT
00740	DELL MARKETING L.P.							
I-10832126969	Dell Pro Smart Dock - IT	R	8/27/2025	527.26		056526		
I-10832203362	Dell Pro Smart Dock - PR	R	8/27/2025	235.87		056526		763.13
00086	E.J. Harrison & Sons Inc							
I-080625	Acct#500546088	R	8/27/2025	1,960.54		056527		1,960.54
00086	E.J. Harrison & Sons Inc							
I-081425a	Acct#1C00053370	R	8/27/2025	318.40		056528		318.40
00086	E.J. Harrison & Sons Inc							
I-081425b	Acct#102258843	R	8/27/2025	339.35		056529		339.35
00086	E.J. Harrison & Sons Inc							
I-081425c	Acct#1C00054240	R	8/27/2025	506.09		056530		506.09
00095	FAMCON PIPE & SUPPLY							
I-S100159077.001	6" Smith Blair Repair Clamp-PL	R	8/27/2025	615.62		056531		
I-S100159082.002	2" Ford Joint Adapter - PL	R	8/27/2025	415.06		056531		
I-S100161571.001	Steel Pipe - MAINT	R	8/27/2025	3,572.07		056531		
I-S100162076.001	Washer Rubber Meter - UT	R	8/27/2025	49.34		056531		
I-S100162262.002	2" Brass Street 90 & Joint Ada	R	8/27/2025	6,477.10		056531		11,129.19
00099	FGL ENVIRONMENTAL							
I-512733A	Plant Effluent DBP 07/29/25	R	8/27/2025	355.00		056532		
I-512734A	Nitrate Monitoring 07/29/25	R	8/27/2025	67.00		056532		
I-512735A	Lab Water Quality - 07/29/25	R	8/27/2025	68.00		056532		
I-513126A	OWS-San Antonio TP 08/05/25	R	8/27/2025	43.00		056532		
I-513127A	Nitrate Monitoring 08/05/25	R	8/27/2025	89.00		056532		
I-513594A	Nitrate Monitoring 08/12/25	R	8/27/2025	67.00		056532		689.00
00713	FLUID MANUFACTURING							
I-49180	Electronic Coin Acceptor - LCR	R	8/27/2025	799.49		056533		799.49
00104	FRED'S TIRE MAN							
I-166787	Flat Repair - PL	R	8/27/2025	40.00		056534		40.00
06382	GP Salmen & Associates Right A							
I-062625	Surveying Old Creek Water	R	8/27/2025	4,610.00		056535		4,610.00
05746	Hasa Inc.							
I-1064213	Sodium Hypochlorite - TP	R	8/27/2025	1,074.58		056536		
I-1065102	Sodium Hypochlorite - TP	R	8/27/2025	4,283.92		056536		5,358.50

VENDOR I.D.	NAME	STATUS	CHECK DATE	INVOICE AMOUNT	DISCOUNT	CHECK NO	CHECK STATUS	CHECK AMOUNT
00596	HOME DEPOT							
I-179385	16 Gauge Steel Kitchen Sink	R	8/27/2025	349.18		056537		
I-6381725	Nails - MAINT	R	8/27/2025	40.71		056537		
I-7903041	Milwaukee Heat Gun - TP	R	8/27/2025	341.06		056537		
I-901627	Sink Cabinet & Drawer Base -WP	R	8/27/2025	378.77		056537		
I-901638	BCH Base - WP	R	8/27/2025	32.34		056537		
I-9396997	Concrete Patcher - MAINT	R	8/27/2025	58.83		056537		
I-9530120	Mini Split - WP	R	8/27/2025	145.85		056537		1,346.74
05884	Ibis Scientific, LLC							
I-IN083772	Petri Dish - LAB	R	8/27/2025	157.06		056538		157.06
00127	INDUSTRIAL BOLT & SUPPLY							
I-266420-1	Washer & Bolt - EM	R	8/27/2025	225.97		056539		225.97
00493	J & H ENGINEERING GENERAL							
I-082725	Asphalt Patching - ENG	R	8/27/2025	28,817.30		056540		28,817.30
02344	Janitek Cleaning Solutions							
I-56995A	Carpet Cleaning 08/05/25	R	8/27/2025	450.00		056541		450.00
00527	LINCOLN AQUATICS							
I-PB115380	Sodium Bicarbonate - WP	R	8/27/2025	240.87		056542		
I-PB115783	Clor Granular & Gal Oil - WP	R	8/27/2025	372.09		056542		612.96
00793	LOS ANGELES REGIONAL WATER							
I-082125	File No. 25-015	R	8/27/2025	3,945.00		056543		3,945.00
06394	MadgeTech,Inc							
I-INV151405	Calibration Services - LAB	R	8/27/2025	194.77		056544		194.77
00151	MEINERS OAKS ACE HARDWARE							
C-D41299	Cr Return - MAINT	R	8/27/2025	15.00CR		056545		
C-D92270	Cr Return - LAB	R	8/27/2025	45.00CR		056545		
C-D98273	Cr Return - MAINT	R	8/27/2025	25.00CR		056545		
I-122210	Concrete Mix - PL	R	8/27/2025	59.97		056545		
I-123804	Texture Spray & Fan - LCRA	R	8/27/2025	188.90		056545		
I-123841	Wire - WP	R	8/27/2025	543.55		056545		
I-123867	Drywall & Bit - LCRA	R	8/27/2025	21.89		056545		
I-124075	Coveralls Poly & Sand Paper -	R	8/27/2025	47.29		056545		
I-124311	Yellow Tape - WP	R	8/27/2025	25.84		056545		
I-124504	Ball Valve - LCRA	R	8/27/2025	8.77		056545		
I-124511	Drywall & Adapter - LCRA	R	8/27/2025	35.76		056545		
I-124600	7" Diamond Cup Wheel & Webpatc	R	8/27/2025	136.86		056545		
I-124611	Drywall & Bushing Flush - WP	R	8/27/2025	98.79		056545		
I-124630	Plumbers Putty - LCRA	R	8/27/2025	5.53		056545		
I-124676	4" Single Cup - EM	R	8/27/2025	42.93		056545		
I-124723	Brass Adapters & Fittings - UT	R	8/27/2025	127.48		056545		

VENDOR I.D.	NAME	STATUS	CHECK DATE	INVOICE AMOUNT	DISCOUNT	CHECK NO	CHECK STATUS	CHECK AMOUNT
	I-124773	Caution Tape - WP	R	8/27/2025	81.91	056545		
	I-125057	Clorox Wps & Soap - UT	R	8/27/2025	27.48	056545		
	I-125187	Broom & Hand Sanitizer - UT	R	8/27/2025	59.18	056545		
	I-125268	Wasp Hornet Killer - EM	R	8/27/2025	21.45	056545		
	I-125293	Cleaning Supplies - LCRA	R	8/27/2025	133.09	056545		
	I-125387	Duct Tape - SAFE	R	8/27/2025	14.14	056545		
	I-125395	LED Bulbs - O&M	R	8/27/2025	11.70	056545		1,607.51
03444	Mission Linen Supply							
	I-524424998	Uniform Pants - MAINT	R	8/27/2025	28.57	056547		
	I-524425001	Uniform Pants - TP	R	8/27/2025	68.61	056547		
	I-524467762	Uniform Pants - PL	R	8/27/2025	51.30	056547		
	I-524467763	Uniform Pants - MAINT	R	8/27/2025	28.57	056547		
	I-524467766	Uniform Pants - TP	R	8/27/2025	68.61	056547		245.66
01570	Ojai Auto Supply							
	I-624233	Battery - Unit 55	R	8/27/2025	273.55	056548		
	I-624878	Winshield Wipers - Unit 51	R	8/27/2025	23.21	056548		296.76
00165	OJAI LUMBER CO, INC							
	I-2507-853092	Hole Saw Arbor & Quick Change	R	8/27/2025	77.08	056549		
	I-2508-856159	Cement - EM	R	8/27/2025	33.88	056549		110.96
00790	PROFORMA							
	I-BI85015457A	Uniform Shirts - LCRA	R	8/27/2025	4,232.20	056550		4,232.20
00306	Rincon Consultants, Inc.							
	I-68071	Robles Maintenance Support	R	8/27/2025	4,887.00	056551		4,887.00
06411	Maria Rodriguez							
	I-128555	Camping Cancellation - LCRA	R	8/27/2025	116.00	056552		116.00
01109	SALVADOR LOERA TRANSPORTATION							
	I-001340	Fill Sand - PL	R	8/27/2025	767.49	056553		
	I-001342	Fill Sand - PL	R	8/27/2025	814.84	056553		
	I-13919	Base - PL	R	8/27/2025	2,549.64	056553		
	I-234985	Fill Sand - PL	R	8/27/2025	1,634.98	056553		5,766.95
04304	Signa Mechanical							
	I-250729	Annual Sentry Advisor - LCRA	R	8/27/2025	125.00	056554		125.00
00608	SMITH PIPE & SUPPLY INC.							
	I-4295220	ZP Rodent Bait - MAINT	R	8/27/2025	496.42	056555		496.42

VENDOR SET: 01 Casitas Municipal Water D

BANK: AP ACCOUNTS PAYABLE

DATE RANGE: 8/21/2025 THRU 9/03/2025

VENDOR I.D.	NAME	STATUS	CHECK DATE	INVOICE AMOUNT	DISCOUNT	CHECK NO	CHECK STATUS	CHECK AMOUNT
00215	SOUTHERN CALIFORNIA EDISON							
I-082125a	Acct#700625798978	R	8/27/2025	488.08		056556		
I-082125b	Acct#700533992421	R	8/27/2025	37,846.33		056556		
I-082525a	Acct#700237081885	R	8/27/2025	14,047.33		056556		
I-082525b	Acct#700356078152	R	8/27/2025	159.74		056556		
I-082525c	Acct#700759897236	R	8/27/2025	13.57		056556		52,555.05
00216	Southern California Gas Co.							
I-082625a	Acct#18231433006	R	8/27/2025	32.41		056557		
I-082625b	Acct#00801443003	R	8/27/2025	374.01		056557		406.42
06091	RedNova Labs, Inc.							
I-1446093	StorEDGE FMS/Website Pro	R	8/27/2025	170.10		056558		170.10
01959	The Wharf							
I-445789	Shirt - UT	R	8/27/2025	48.44		056559		
I-445795	Uniform Shirts & Hoodie - IT	R	8/27/2025	483.66		056559		
I-455207	Uniform Hats, Shirts & Hoodies	R	8/27/2025	1,522.30		056559		
I-455670	Uniform Shirt, Pants & Hoddie	R	8/27/2025	285.86		056559		2,340.26
01173	TOICO INDUSTRIES, INC.							
I-0243550-IN	Green PVC Gauntlet Gloves - LC	R	8/27/2025	115.79		056560		115.79
00825	USA BLUEBOOK							
I-INV00806984	SPCA, Tryptic Soy Broth & Samp	R	8/27/2025	1,211.23		056561		1,211.23
00246	VENTURA COUNTY AIR POLLUTION							
I-R008039	Permit No. 01226 - ENG	R	8/27/2025	1,205.55		056562		1,205.55
00254	VENTURA LOCKSMITHS							
I-AJ062625-3	Duplicate Key - LCRA	R	8/27/2025	40.00		056563		40.00
09955	VENTURA WHOLESALE ELECTRIC							
I-322102	L/T Flex Conn - EM	R	8/27/2025	44.91		056564		
I-338285	Intermatic Photo Control - EM	R	8/27/2025	235.56		056564		
I-338554	140 Media Center & Elbow - WP	R	8/27/2025	66.20		056564		
I-338706	Angle Conn & Torpedo Level-Lig	R	8/27/2025	149.34		056564		496.01
03758	County of Ventura - Fleet Serv							
I-9117-0806	2008 Dodge Ram 1500 2WD	R	8/27/2025	8,500.00		056565		8,500.00
00663	WAXIE SANITARY SUPPLY							
I-83426421	Janitorial Supplies - LCRA	R	8/27/2025	117.03		056566		
I-83428273	Janitorial Supplies - LCRA	R	8/27/2025	2,396.01		056566		
I-83428277	Janitorial Supplies - LCRA	R	8/27/2025	953.16		056566		
I-83428278	Janitorial Supplies - LCRA	R	8/27/2025	771.81		056566		
I-83434913	Janitorial Supplies - LCRA	R	8/27/2025	123.90		056566		4,361.91

VENDOR I.D.	NAME	STATUS	CHECK DATE	INVOICE AMOUNT	DISCOUNT	CHECK NO	CHECK STATUS	CHECK AMOUNT
00330	I-10022292341	WHITE CAP CONSTRUCTION SUPPLY						
		Broom & Shovel - UT	R 8/27/2025	223.08		056567		223.08
00004	I-0706922	ACWA JOINT POWERS INSURANCE AU						
		Health Insurance 10/25	R 9/03/2025	183,510.78		056568		183,510.78
00010	I-9164113636	AIRGAS USA LLC						
		Airgas Cylinders - PL	R 9/03/2025	2,070.00		056569		2,070.00
06401	I-090325	Aisholz LLC						
		Plan Check Deposit Refun	R 9/03/2025	787.70		056570		787.70
03044	I-11TC-QY1G-NGKN	Amazon Capital Services						
	I-1316-YR99-GXV6	Rubber Boots & Face Ear Protec	R 9/03/2025	462.81		056571		
	I-19TV-Q7LP-3HDV	Grade and Survey Stakes - MAIN	R 9/03/2025	124.35		056571		
	I-1C13-RC3K-CQHD	Pressure Washer Nozzle - MAINT	R 9/03/2025	75.36		056571		
	I-1DQ7-DGPF-DTVF	Screwdriver Bit Set - MAINT	R 9/03/2025	196.88		056571		
	I-1FFM-W99R-DM4X	Grade/Survey Stake - MAINT	R 9/03/2025	124.20		056571		
	I-1PXP-YCMQ-CFW3	Hats - O&M	R 9/03/2025	38.46		056571		
		Hats - O&M	R 9/03/2025	184.38		056571		1,206.44
06060	I-INV89978	Ameriflex						
		FSA Admin Fee	R 9/03/2025	75.60		056572		75.60
00014	I-SI2602181	AQUA-FLO SUPPLY						
		Ball Valve & Brass Plug - TP	R 9/03/2025	19.40		056573		19.40
00840	I-INV0109944	AQUA-METRIC SALES COMPANY						
		2" & 4" Omni Meter - UT	R 9/03/2025	36,432.13		056574		36,432.13
01666	I-000023979651	AT & T						
		Acct#9391064013	R 9/03/2025	31.16		056575		31.16
01666	I-000024006137	AT & T						
		Acct#9391080431	R 9/03/2025	932.80		056576		932.80
00030	I-1901017168	B&R TOOL AND SUPPLY CO						
	I-1901017169	Mastic Seal White 3.5 Pail - M	R 9/03/2025	434.23		056577		
		Chevron GST Turbine Oil - TP	R 9/03/2025	394.37		056577		828.60
05964	I-187944701082125	Charter Communications Holding						
		Acct#187944701	R 9/03/2025	685.00		056578		685.00

VENDOR SET: 01 Casitas Municipal Water D

BANK: AP ACCOUNTS PAYABLE

DATE RANGE: 8/21/2025 THRU 9/03/2025

VENDOR I.D.	NAME	STATUS	CHECK DATE	INVOICE AMOUNT	DISCOUNT	CHECK NO	CHECK STATUS	CHECK AMOUNT
06409	Jamison Combs							
I-1271852006	Trailer Storage Removed - LCRA	R	9/03/2025	82.75		056579		82.75
06127	Dion & Sons, Inc							
I-SP29939	Diesel - LCRA	R	9/03/2025	2,561.06		056580		
I-SP29940	Gas - LCRA	R	9/03/2025	2,224.98		056580		4,786.04
00095	FAMCON PIPE & SUPPLY							
I-S100160450.001	Romac 501 Center Ring & 12' Re	R	9/03/2025	573.79		056581		
I-S100162947.001	Gasket - TP	R	9/03/2025	114.97		056581		688.76
00101	FISHER SCIENTIFIC							
I-3179626	Cover Glasses & E. Faecalis	R	9/03/2025	231.18		056582		231.18
00713	FLUID MANUFACTURING							
I-49172	Shower Tokens - LCRA	R	9/03/2025	2,202.25		056583		2,202.25
00121	HACH COMPANY							
I-14638269	TU5300sc Low Range TurbidityTP	R	9/03/2025	3,820.62		056584		3,820.62
00596	HOME DEPOT							
C-191496	Doors Return - WP	R	9/03/2025	705.71CR		056585		
I-1903852	Caulk Gun - MAINT	R	9/03/2025	51.43		056585		
I-2137479	Adjust Pipe Wrench - MAINT	R	9/03/2025	111.34		056585		
I-2896660	2" Ridgid Hole Straps 50pack	R	9/03/2025	119.27		056585		
I-3903261	Elastic Polyurethane Sealant	R	9/03/2025	43.87		056585		
I-8401894	Doors - WP	R	9/03/2025	705.71		056585		325.91
00125	IDEXX DISTRIBUTION CORP							
I-3182681608	Colilert - LAB	R	9/03/2025	1,522.66		056586		1,522.66
05891	Ixom Watercare Inc							
I-85003480	GS-9-10V Mixer 100299 - LAB	R	9/03/2025	11,830.57		056587		11,830.57
09910	J.W. ENTERPRISES							
I-397210	CT Pumping - 4M PP	R	9/03/2025	82.75		056588		
I-397211	CT Pumping - GRAND AVE	R	9/03/2025	82.75		056588		
I-397212	CT Pumping - SA PLANT	R	9/03/2025	165.50		056588		
I-397213	CT Pumping - 3M PUMP	R	9/03/2025	82.75		056588		
I-397214	CT Pumping - FAIRVIEW RES.	R	9/03/2025	82.75		056588		
I-397215	CT Pumping - CASITAS DAM	R	9/03/2025	82.75		056588		
I-397216	CT Pumping - BATES RES.	R	9/03/2025	82.75		056588		
I-397217	CT Pumping - MUTUAL YARD	R	9/03/2025	82.75		056588		744.75

VENDOR SET: 01 Casitas Municipal Water D

BANK: AP ACCOUNTS PAYABLE

DATE RANGE: 8/21/2025 THRU 9/03/2025

VENDOR I.D.	NAME	STATUS	CHECK DATE	INVOICE AMOUNT	DISCOUNT	CHECK NO	CHECK STATUS	CHECK AMOUNT
06400	Alex Keller							
I-090325	Facility Inspection Deposit Re	R	9/03/2025	262.97		056589		262.97
05449	Matheson Tri-Gas, Inc.							
I-0032021724	Liquid Oxygen - TP	R	9/03/2025	23,906.29		056590		23,906.29
06399	Martin McDonald							
I-090325	Meter Installation Deposit Ref	R	9/03/2025	1,605.87		056591		1,605.87
00151	MEINERS OAKS ACE HARDWARE							
I-125774	Ext Pole & Paint Roller - MAIN	R	9/03/2025	132.13		056592		
I-125797	Straw Hat - MAINT	R	9/03/2025	10.71		056592		
I-125803	Tube Cutter Red - PL	R	9/03/2025	14.63		056592		
I-125912	LED Flashlight & Headlamp - UT	R	9/03/2025	77.08		056592		234.55
03444	Mission Linen Supply							
I-524424997	Uniform Pants - PL	R	9/03/2025	51.30		056593		51.30
01570	Ojai Auto Supply							
I-625183	Air Freshener - PL	R	9/03/2025	13.04		056594		13.04
00169	OJAI VALLEY SANITARY DISTRICT							
I-27475	Cust#82921	R	9/03/2025	64.14		056595		64.14
01627	OSCAR'S TREE SERVICE							
I-64078	Resercoir Tank Clearance-OE,4M	R	9/03/2025	3,500.00		056596		3,500.00
01439	PRECISION POWER EQUIPMENT							
I-72517	PS90, Bar & Chain - UT	R	9/03/2025	217.63		056597		217.63
00790	PROFORMA							
I-BI85015661A	Safety Vest Logo - PL	R	9/03/2025	215.50		056598		215.50
06412	Donald Sandoval							
I-31124-R	Trailer Storage Removed - LCRA	R	9/03/2025	148.06		056599		148.06
02756	SC Fuels							
I-IN-0000193386	Gas - DO	R	9/03/2025	6,542.93		056600		6,542.93
00215	SOUTHERN CALIFORNIA EDISON							
I-082725	Acct#700387230310	R	9/03/2025	17.62		056601		17.62
06064	T-Mobile							
I-082825	Acct#987771959	R	9/03/2025	31.35		056602		31.35

VENDOR SET: 01	BANK: AP	TOTALS:	NO 114	INVOICE AMOUNT 706,146.42	DISCOUNTS 0.00	CHECK AMOUNT 706,146.42
BANK: AP	TOTALS:		114	706,146.42	0.00	706,146.42
REPORT TOTALS:			114	706,146.42	0.00	706,146.42

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: No checks cut during this period
Adj. Draft
Voids:



Janyne Brown, Chief Financial Officer

Casitas Municipal Water District
Reimbursement Disclosure Report (1)
Fiscal Year 2025/26
July 1, 2025-June 30, 2026

<u>Date paid</u>	<u>Board of Director/Employee</u>	<u>Description</u>	<u>Amount Paid</u>
07/09/25	Eric Lara	Water Treatment Review Course	\$ 157.45
07/16/25	Cody Pletcher	Lodging American Red Cross LGIT Training	\$ 461.15
07/24/25	Cory Johnson	AWWA Exam for Backflow Prevation Adembly Tester	\$ 360.00
08/06/25	Scott MacDonald	T4 Certificate Renewal	\$ 105.00
08/07/25	Corban Suggs	College Class	\$ 219.00
08/13/25	Jesus Garcia	College Class	\$ 219.00
08/13/25	Scott MacDonald	D4 Certificate Renewal	\$ 105.00
09/04/25	Gustavo Muro	ESRI Conference Travel Expenses	\$ 268.10
09/04/25	Donnell Evans	E&I-2 Certificate Renewal	\$ 119.00
09/04/25	Joe Martinez	Cabin Signs	\$ 91.78
09/04/25	Alvin Domingo	Microbiology Lab Training Webinar	\$ 125.00

Minutes of the
Casitas Municipal Water District
Board Meeting of
August 27, 2025

1. CALL TO ORDER

President Kaiser called the meeting to order at 5:00 p.m.

2. ROLL CALL

Directors Hajas, Brennan, Bergen, and Kaiser are present. Director Cole requested to attend remotely for just cause because of illness. Also present are GM Flood, EA Vieira, and Counsel McNulty.

3. PLEDGE OF ALLEGIANCE

President Kaiser led the pledge of allegiance.

4. AGENDA CONFIRMATION

The agenda was confirmed.

5. PUBLIC COMMENTS - Presentation on District related items that are not on the agenda - three-minute limit.

Russ Baggerly made comments regarding payment to Roger Marzulla and concerns about the assumption the district is resurrecting the takings claim against the Federal Government and expressed that it is an unwinnable objection. Mr. Baggerly also encouraged the board to resolve the Pueblo and Treaty Rights claims by the City of San Buenaventura.

6. CONSENT AGENDA

6.a Accounts Payable Report.
[Accounts Payable Report.pdf](#)

6.b Minutes of the August 13, 2025 Board Meeting.
[8 13 2025 Min.pdf](#)

The Consent Agenda was offered by Director Brennan, seconded by Director Hajas, and adopted by the following roll call vote:

AYES:	Directors:	Hajas, Cole, Brennan, Bergen, Kaiser
NOES:	Directors:	None
ABSENT:	Directors:	None

7. ACTION ITEMS

- 7.a Resolution changing authorizing for investment of monies in the Local Agency Investment Fund.
[Board Memo LAIF Update 082725.pdf](#)
[Reso LAIF.pdf](#)

The Resolution was offered by Director Bergen, seconded by Director Brennan, and adopted by the following roll call vote:

AYES:	Directors:	Hajas, Cole, Brennan, Bergen, Kaiser
NOES:	Directors:	None
ABSENT:	Directors:	None

Resolution is numbered 2025-17

- 7.b Authorize the General Manager to issue Amendment No. 4 to Water Works Engineers, LLC, in an amount not to exceed \$80,382 for design and bidding support related to the Ventura-Santa Barbara Counties Intertie.
[Board Memo_20250827-Bid Support.pdf](#)
[CMWD_VTA-SB Intertie_Amend No. 4_Owner Furnished Equip Support Svcs \(20250820\).pdf](#)

On the motion of Director Brennan, seconded by Director Bergen, the above recommendation was approved by the following roll call vote:

AYES:	Directors:	Hajas, Cole, Brennan, Bergen, Kaiser
NOES:	Directors:	None
ABSENT:	Directors:	None

- 7.c Authorize the General Manager to issue Amendment No. 1 to Cannon Corporation in an amount not to exceed \$134,299 for design and bidding support related to the Ventura-Santa Barbara Counties Intertie.
[Board Memo_20250827-Bid Support.pdf](#)
[Ventura SB Intertie ASA No 1__2025-08-19.pdf](#)

On the motion of Director Brennan, seconded by Director Hajas, the above recommendation was approved by the following roll call vote:

AYES:	Directors:	Hajas, Cole, Brennan, Bergen, Kaiser
NOES:	Directors:	None
ABSENT:	Directors:	None

- 7.d Authorize the General Manager to issue Amendment No. 1 to Kennedy Jenks Consultants, Inc., in an amount not to exceed \$10,195 for bid support services related to the Ventura-Santa Barbara Counties Intertie.
[Board Memo_20250827-Bid Support.pdf](#)
[CMWD Ven-SB Intertie Amend No.1.pdf](#)

On the motion of Director Hajas, seconded by Director Bergen, the above recommendation was approved by the following roll call vote:

AYES:	Directors:	Hajas, Cole, Brennan, Bergen, Kaiser
NOES:	Directors:	None
ABSENT:	Directors:	None

- 7.e Recommendation to declare three district vehicles as surplus and direct staff to dispose of same.

[MEMO -Surplus Vehicles – Aug 21 2025.pdf](#)

On the motion of Director Hajas, seconded by Director Brennan, the above recommendation was approved by the following roll call vote:

AYES:	Directors:	Hajas, Cole, Brennan, Bergen, Kaiser
NOES:	Directors:	None
ABSENT:	Directors:	None

8. INFORMATION ITEMS

- 8.a Hydrology Report for July 2025.

[Hydrology July 2025.pdf](#)

The information items were received.

9. GENERAL MANAGER COMMENTS

GM Flood informed the board that there is continued contact with FEMA and we hope to receive more funding.

10. BOARD OF DIRECTOR REPORTS ON MEETINGS ATTENDED

None

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

None

President Kaiser moved the meeting to closed session at 5:18 p.m.

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. 19ATCP01176.

President Kaiser moved the meeting back into open session at 7:16 pm with Mr. McNulty stating the board met in closed session and there was no reportable action was taken.

13. ADJOURNMENT

President Kaiser adjourned the meeting at 7:17 p.m.

Brian Brennan, Secretary

**CASITAS MUNICIPAL WATER DISTRICT
MEMORANDUM**

TO: BOARD OF DIRECTORS
FROM: MICHAEL FLOOD, GENERAL MANAGER
SUBJECT: CASITAS AND OJAI WATER SYSTEM CONSOLIDATION
DATE: 9/10/2025

RECOMMENDATION:

- Adopt the Initial Study-Mitigated Negative Declaration for the Casitas and Ojai Water System Consolidation dated September 2, 2025
- Adopt the Mitigation, Monitoring and Reporting Program (MMRP) for the Casitas and Ojai Water System Consolidation dated September 2, 2025

BACKGROUND:

The Initial Study-Mitigated Negative Declaration for the Casitas-Ojai Water System (OWS) Consolidation was released for public review on July 18, 2025, with a deadline for comment letters of August 18, 2025. Projects included in the overall consolidation 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

Comment letters were received from: California State Water Resources Control Board; County of Ventura Transportation; County of Ventura Watershed Protection District; Caltrans; and California Department of Fish and Wildlife. Responses to comments are addressed in the Final Initial Study-Mitigated Negative Declaration. The Final MMRP will be incorporated into specifications when individual projects are released for bidding.

Attachments:

- Final Initial Study-Mitigated Negative Declaration for the Casitas and Ojai Water System Consolidation dated September 2, 2025
- Final Mitigation, Monitoring and Reporting Program (MMRP) for the Casitas and Ojai Water System Consolidation dated September 2, 2025

CASITAS MUNICIPAL WATER DISTRICT

RESOLUTION NO. 2025-18

**RESOLUTION APPROVING THE MITIGATED NEGATIVE DECLARATION AND
MITIGATION MONITORING AND REPORTING PROGRAM FOR THE CASITAS-OJAI
WATER SYSTEM CONSOLIDATION PROJECT,
ADOPTING THE NOTICE OF DETERMINATION,
AND DIRECTING THE NOTICE OF DETERMINATION TO BE FILED WITH THE
CLERK OF THE COUNTY OF VENTURA**

WHEREAS, An Initial Study was conducted which determined although the 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 or agreed to.

NOW, THEREFORE, BE IT RESOLVED by the Board of Directors of the Casitas Municipal Water District as follows:

1. The Board finds the Casitas-Ojai Water System Consolidation Project, with the mitigation measures included in the Initial Study will not have a significant effect on the environment.
2. These findings are made pursuant to the provisions of CEQA.
3. The Notice of Determination for the Casitas-Ojai Water System Consolidation Project be adopted by the Board.
4. The Clerk of the Board files the Notice of Determination with the Clerk of the County of Ventura.

ADOPTED this 10th day of September 2025.

Pete Kaiser, President
Casitas Municipal Water District

ATTEST

Brian Brennan, Secretary
Casitas Municipal Water District



Casitas-Ojai Water System Consolidation Project

Final Initial Study – Mitigated Negative Declaration

prepared by

Casitas Municipal Water District

1055 Ventura Avenue

Oak View, California 93022

Contact: Julia Aranda, Engineering Manager

prepared with the assistance of

Rincon Consultants, Inc.

180 North Ashwood Avenue

Ventura, California 93003

September 2025

Table of Contents

Initial Study	1
1. Project Title	1
2. Lead Agency Name and Address	1
3. Contact Person and Phone Number	1
4. Project Location	1
5. General Plan Designation and Zoning	10
6. Description of Project	10
7. Surrounding Land Uses and Setting	13
8. Other Public Agencies Whose Approval is Required	14
Environmental Factors Potentially Affected	15
Determination	15
Environmental Checklist	17
1 Aesthetics	17
2 Agriculture and Forestry Resources	21
3 Air Quality	23
4 Biological Resources	29
5 Cultural Resources	38
6 Energy	42
7 Geology and Soils	44
8 Greenhouse Gas Emissions	54
9 Hazards and Hazardous Materials	56
10 Hydrology and Water Quality	60
11 Land Use and Planning	66
12 Mineral Resources	68
13 Noise	70
14 Population and Housing	76
15 Public Services	78
16 Recreation	80
17 Transportation	82
18 Tribal Cultural Resources	84
19 Utilities and Service Systems	86
20 Wildfire	90
21 Mandatory Findings of Significance	94
Federal Cross-Cutting Environmental Regulations Evaluation	98
References	104
Bibliography	104
List of Preparers	108

Tables

Table 1 Project Site General Plan Land Use Designations and Zoning10

Table 2 Project Component Construction Durations13

Table 3 Project Site Surrounding Land Uses14

Table 4 Construction Emissions (pounds/day)26

Table 5 Project Component and Paleontological Sensitivity50

Table 6 Estimated Construction GHG Emissions55

Table 7 Construction Noise Levels72

Table 8 Groundborne Vibration Architectural Damage Thresholds73

Table 9 Proposed Project Total Annual Construction Emissions100

Figures

Figure 1 Regional Project Location2

Figure 2 Project Location, Private Drive and Foothill Road3

Figure 3 Project Location, Running Ridge6

Figure 4 Project Location, Arbolada Tank and Pump Station7

Figure 5 Project Location, Ojai East Tank8

Figure 6 Project Location, OWS Wellfield9

Figure 7 Geologic Map of the Project Site51

Appendices

Appendix A Air Quality and Greenhouse Gas Emissions Modeling

Appendix B Biological Resources Assessment

Appendix C Construction Noise Modeling

Initial Study

1. Project Title

Casitas-Ojai Water System Consolidation Project

2. Lead Agency Name and Address

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

3. Contact Person and Phone Number

Julia Aranda, PE
Engineering Manager
jaranda@casitaswater.com
(805) 649-2251 x107

4. Project Location

The project site is comprised of multiple areas in unincorporated Ventura County and the city of Ojai, as described below:

- **Private Drive:** This site is located in unincorporated Ventura County and consists of a private, unnamed roadway extending west from Foothill Road.
- **Foothill Road:** This site is located on the border of unincorporated Ventura County and the city of Ojai, at the intersection of Foothill Road and Fairview Road. This site is currently developed with a public roadway (Foothill Road).
- **Running Ridge Tanks:** This site is located in unincorporated Ventura County and consists of vegetated land north of Running Ridge Trail at Assessor's Parcel Number (APN) 010012021 and 010013021. This site is partially developed with private residences and with the Running Ridge Tanks.
- **Arbolada Tank and Pump Station:** This site is located in the city of Ojai and consists of an approximately 1.2-acre site south of Fairview Road at APN 020001001. This site is currently developed with the Arbolada Tank ~~and Valley View Booster Pump Station (BPS).~~
- **Ojai East Tank:** This site is located in unincorporated Ventura County and consists of an approximately 3.7-acre site south of the intersection of Reeves Road and McAndrew Road, at APN 030017007. This site is currently developed with the Ojai East Tank and San Antonio Booster Pump Station (BPS).
- **Ojai Water System (OWS) Wellfield:** This site is located in the city of Ojai and consists of an approximately 3.2-acre site south of Grand Avenue at APN 028011102. This site is currently developed with the OWS Wellfield.

Figure 1 presents the regional location of the project site, and Figure 2 through Figure 6 present the location of each project element within a neighborhood context.

Figure 1—Regional Project Location

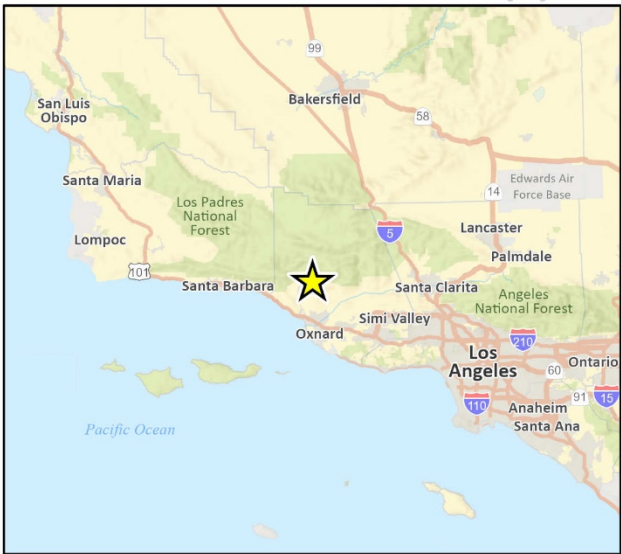
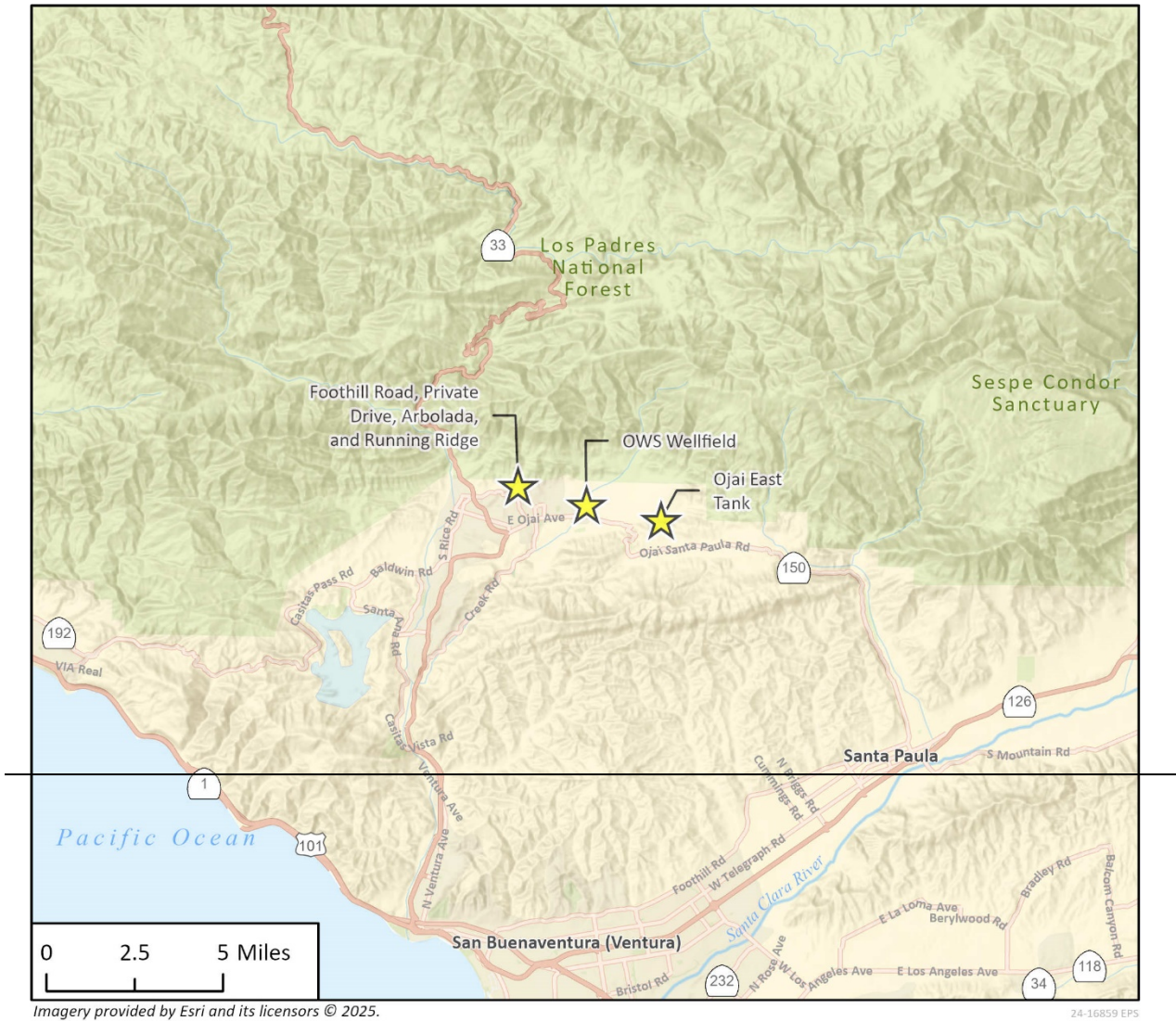
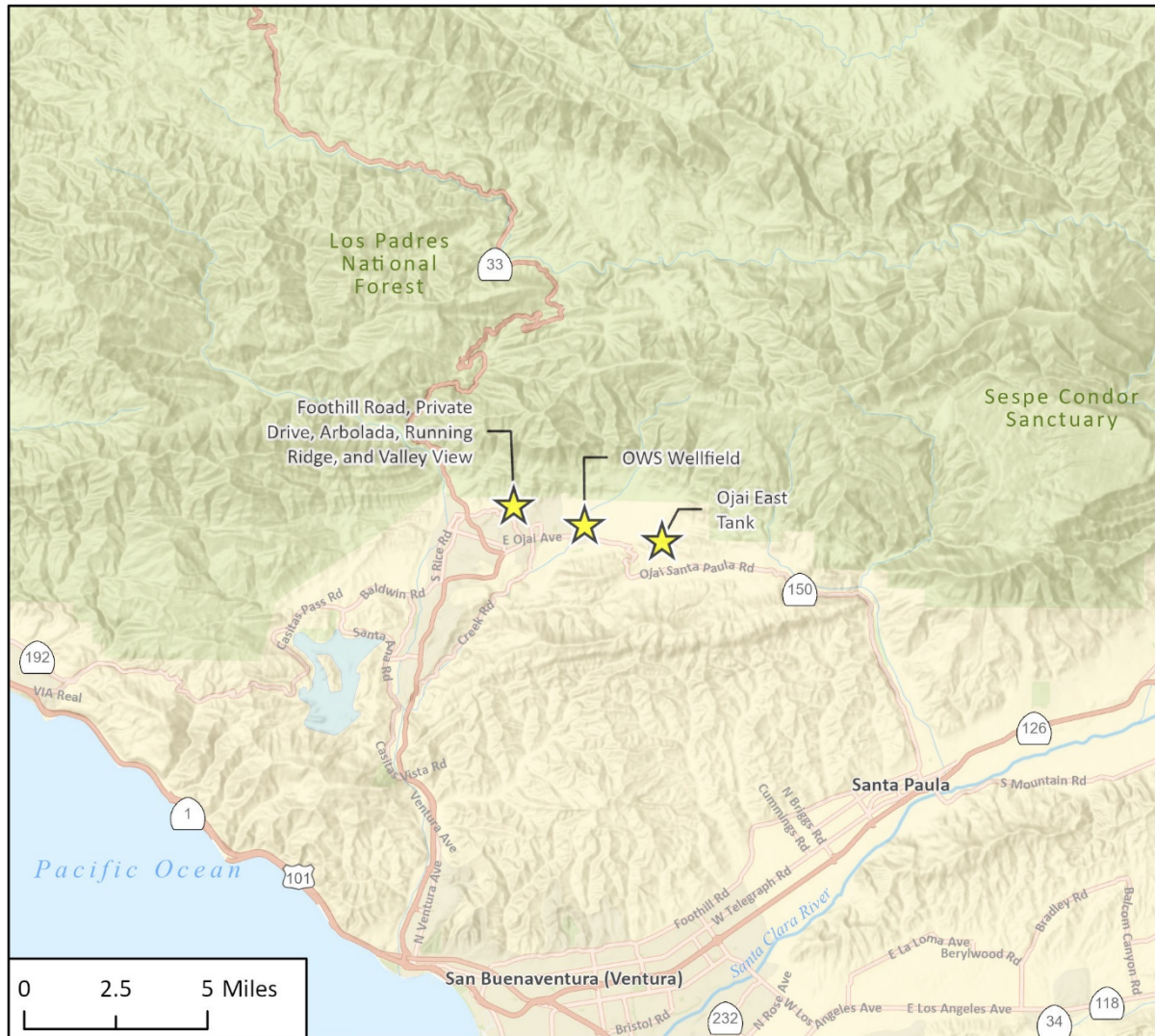


Figure 1 Regional Project Location



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Fig 1 Regional Location

★ Project Location

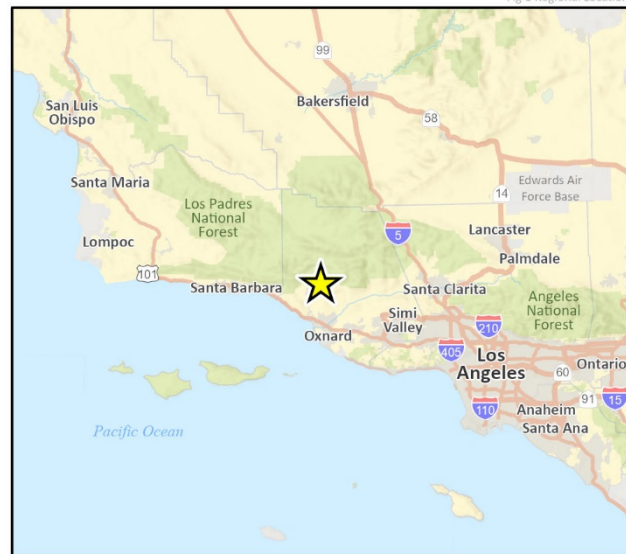


Figure 2—Project Location, Private Drive and Foothill Road



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Fig 2 Project Location

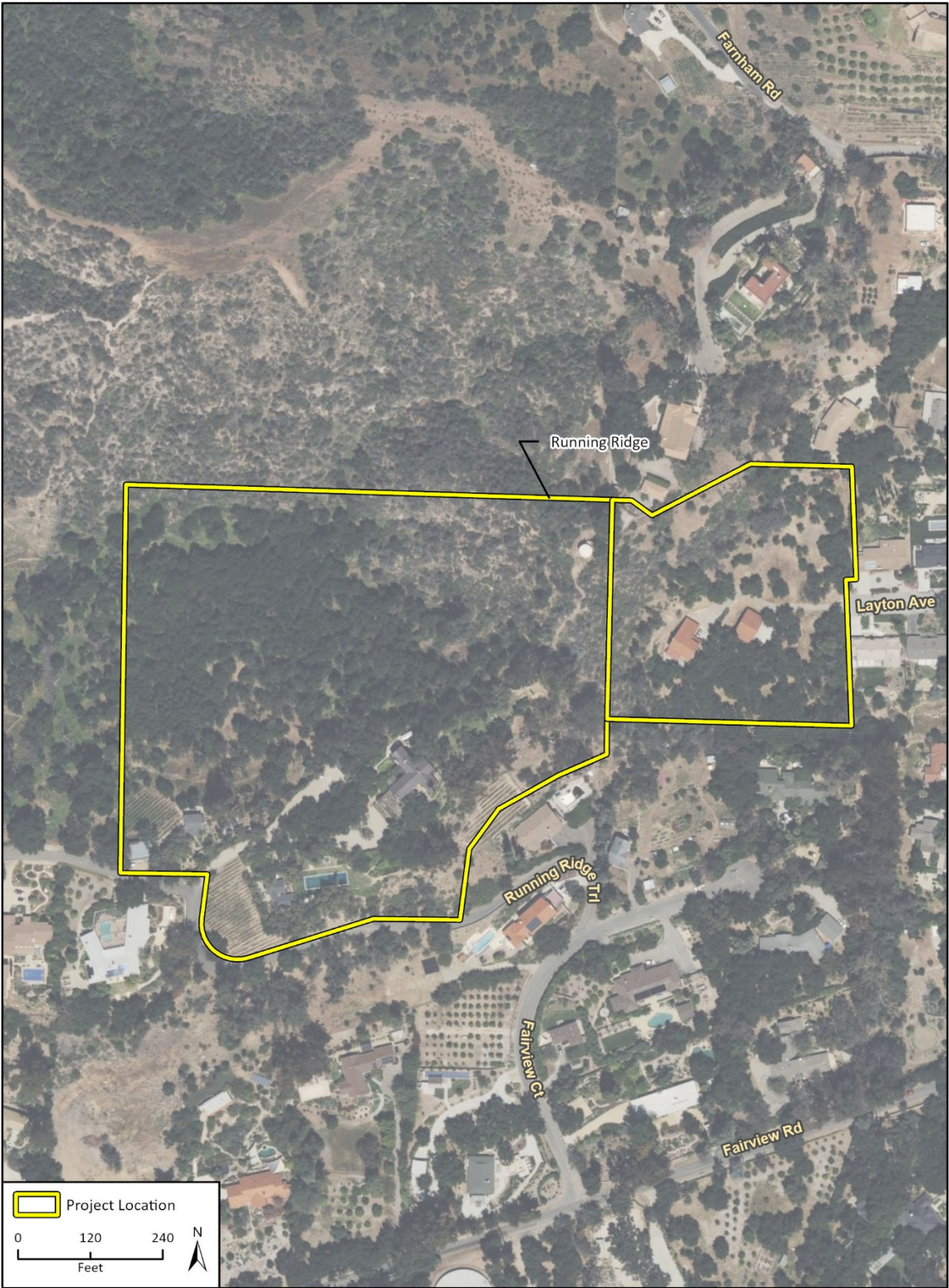
Figure 2 Project Location, Private Drive and Foothill Road



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Fig 2 Project Location

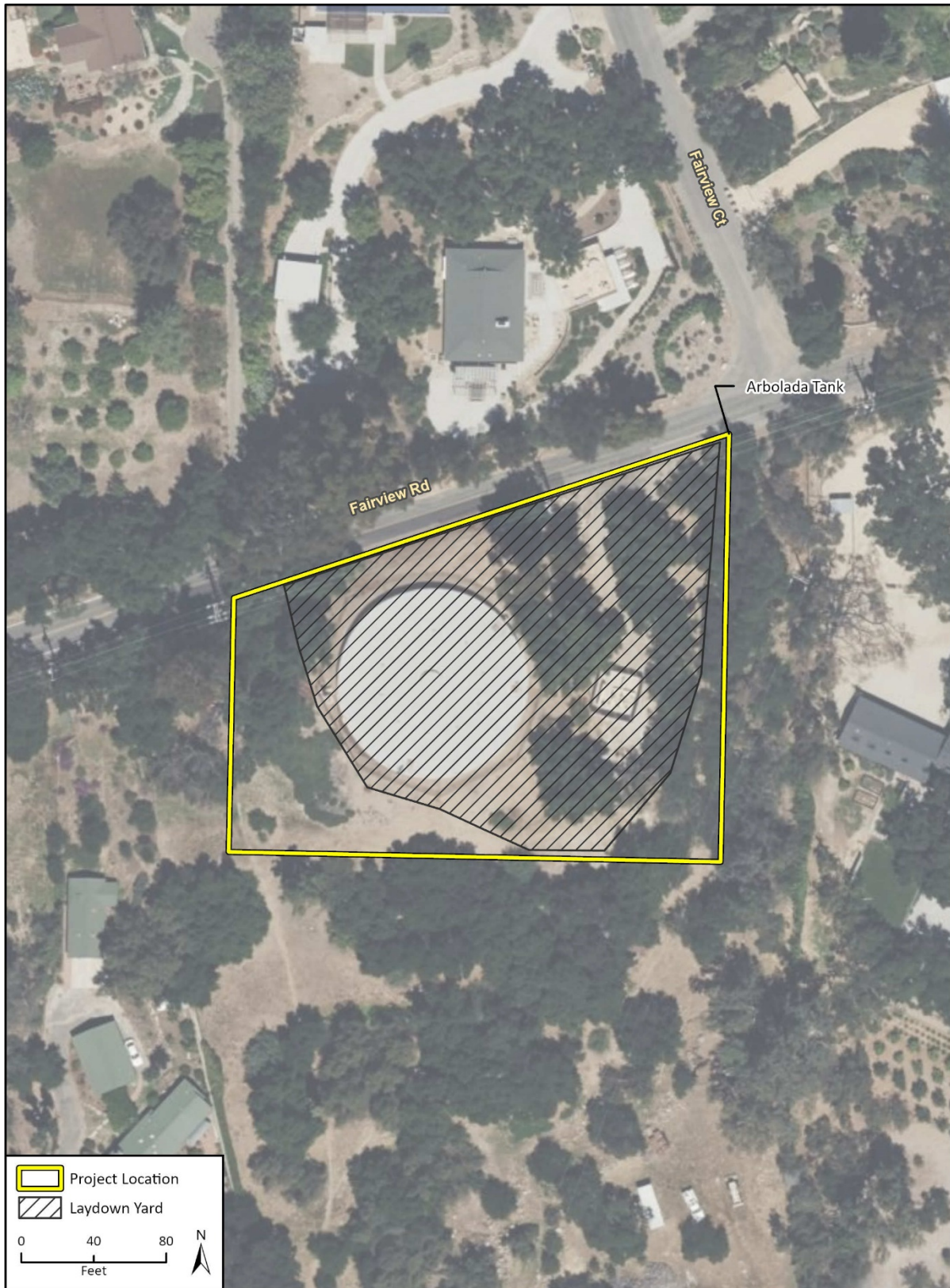
Figure 3 Project Location, Running Ridge



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Fig 2 Project Location1

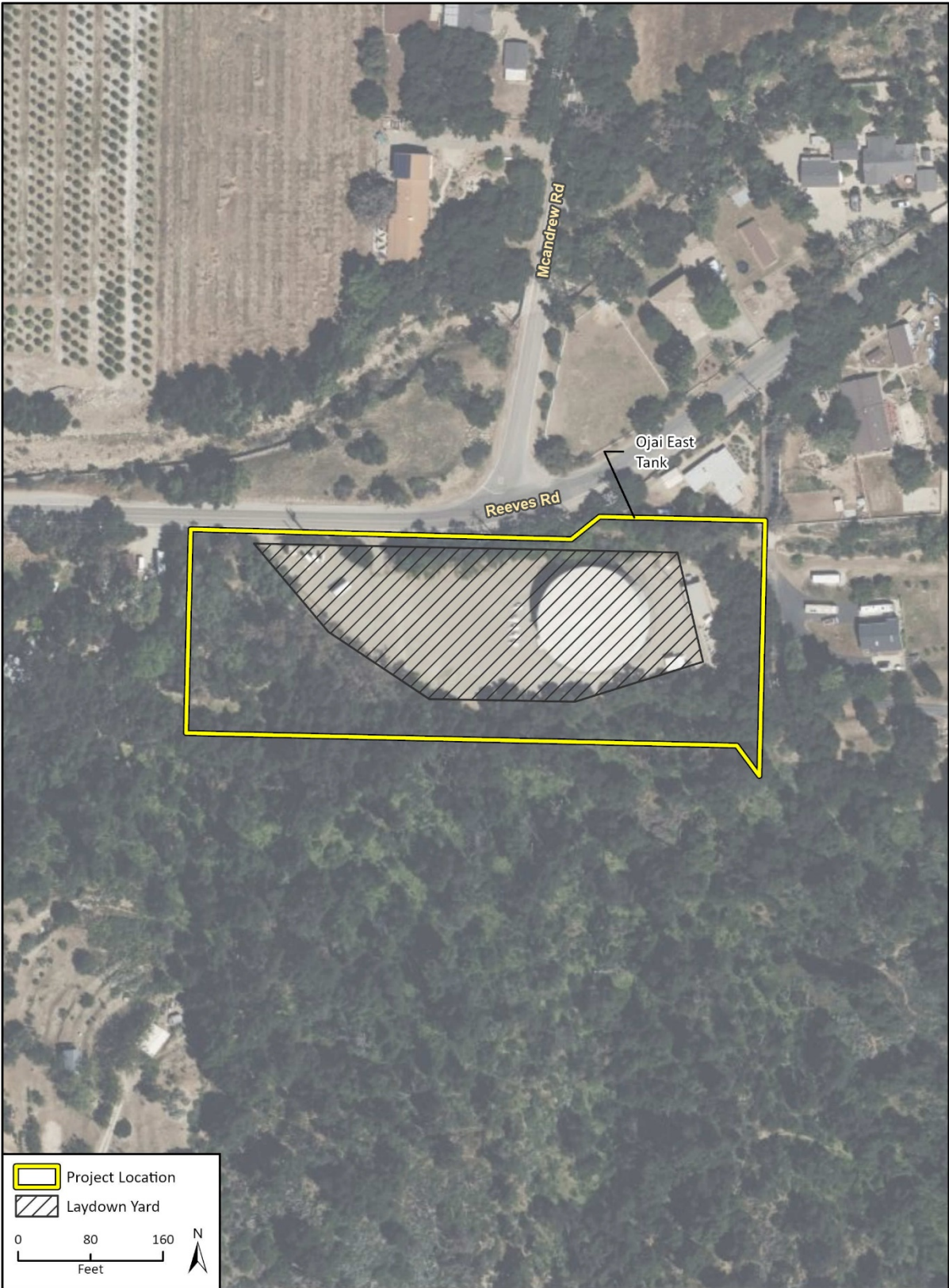
Figure 4 Project Location, Arbolada Tank and Pump Station



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Fig 2 Project Location

Figure 5 Project Location, Ojai East Tank



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Fig 2 Project Location

Figure 6 Project Location, OWS Wellfield



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Fig 2 Project Location

5. General Plan Designation and Zoning

Table 1 provides the City of Ojai and County of Ventura General Plan land use designations and zoning for each component of the proposed project. The Foothill Road site is located within a public roadway and consequently does not have a land use designation or zoning designation.

Table 1 Project Site General Plan Land Use Designations and Zoning

Project Component	Land Use Designation	Zoning Designation
Foothill Road Pipeline	Not applicable	Not applicable
Private Drive Pipeline	Rural	Rural Agricultural-2
Arbolada Tank Demolition	Low Density Residential	Public
Running Ridge Tank Abandonment	Rural	Rural Agricultural-5
Ojai East Tank Rehabilitation and Construction	Rural	Rural Exclusive-5
OWS Water System Wellfield Chloramine Conversion	Rural	Agricultural

Sources: County of Ventura 2025; City of Ojai 2008

Per California Government Code Section 53091, building and zoning ordinances of a county or city do not apply to the location or construction of facilities for the production, storage, or transmission of water, wastewater, or electrical energy by a local agency. The following information is provided for informational purposes.

According to Section 8104-2 of the Ventura County Code, the Rural Agricultural zone is intended to provide for and maintain a rural setting where a wide range of agricultural uses are permitted while surrounding residential land uses are protected, and the Rural Exclusive zone is intended to provide for and maintain rural residential areas in conjunction with horticultural activities, and to provide for a limited range of service and institutional uses which are compatible with and complementary to rural residential communities. According to Section 10-2.601 of the City of Ojai’s Municipal code, the Public zone is applied to areas appropriate for public facilities, government offices, and cultural facilities, and the Agricultural zone is intended to preserve lands suitable for commercial agricultural activities, and to protect local agriculture as an economic and environmental resource.

6. Description of Project

Casitas Municipal Water District (Casitas) acquired the OWS in 2017 from Golden State Water Company. The proposed project would integrate the OWS with the Casitas Water System to address insufficient storage capacity in the OWS and provide compatible water treatment to both systems. The proposed project consists of five main components: pipeline installation; tank demolition and construction; tank rehabilitation; water treatment; and booster pump station demolition and construction. These four components are discussed in the following subsections. Table 2 presents the construction timeframe for each project component. Construction would mostly be limited to between 8:00 am and 4:30 pm, Monday through Friday. No nighttime construction would be required.

Pipelines

The typical construction sequence for the project would include the following pipeline installation activities:

- **Open-cut trench pipeline installation** typically consists of trench excavation (including saw cutting of pavement where applicable), pipe bedding stabilization, pipe installation, and backfill. The construction crew would typically operate a backhoe and/or excavator, compaction equipment (attachment to an excavator and hand-operated equipment), dump trucks for stockpiling of soils and delivery of backfill material, and utility trucks (with truck-mounted or towed generator and hand tools).
- **Temporary paving and ground restoration** typically is performed at the completion of each segment of pipeline and then final paving is performed at the end of a project once all excavation and backfill operations have been completed.

The maximum depth of excavation would be 10 feet.

Private Drive Pipeline

The project would include installation of approximately 450 linear feet of new 6-inch water pipeline at the Private Drive site, extending west from Foothill Road in unincorporated Ventura County. The western terminus of the new water line would be at a fire hydrant, and the eastern terminus of the new water line would connect to an existing 6-inch water line within Foothill Road, at the intersection of the private roadway and Foothill Road.

Construction activities at the Private Drive site are not anticipated to encounter groundwater. Water used for hydrostatic testing and disinfection of the new pipeline would be dechlorinated and discharged to a local storm drain or sewer in accordance with Casitas' applicable National Pollutant Discharge Elimination System (NPDES) permit. During construction, workers would park at Arbolada Plant or along the shoulder of the private roadway, Foothill Road, or Fairview Road.

Foothill Road Pipeline

The project would include installation of approximately 1,100 linear feet of new 8-inch pipeline at the Foothill Road site, which would extend from a new pressure-reducing valve station (south of the intersection of Foothill Road and Fairview Road) north where it would connect to an existing 6-inch water line at Station 31+78.48 (just north of the intersection of Foothill Road and a private driveway).

If groundwater is encountered during construction activities at the Foothill Road site, groundwater would be discharged to an on-site retention pond, or monitored and discharged to a local storm drain or sewer in accordance with Casitas' NPDES permit. Water used for hydrostatic testing and disinfection of the new pipeline would be dechlorinated and discharged to a local storm drain or sewer in accordance with Casitas' applicable NPDES permit. During construction, workers would park at Arbolada Plant or along the shoulder of Foothill Road.

Tanks

Arbolada and Running Ridge Tanks

The project would include demolition of the existing 1.0-million gallon (MG) concrete tank at the Arbolada Tank site. The tank would be drawn down prior to demolition, and any remaining water

would be considered nuisance water and appropriately disposed of on-site. Following demolition, the site of the former tank would be leveled. The project would also include abandonment of the existing Running Ridge tanks, located at the Running Ridge site. No ground disturbance would occur for the abandonment of the Running Ridge tanks.

Ojai East Tank

The project would include the construction of a 1.0-MG welded steel tank located at the Ojai East Tank site. The new tank would have a height of 40 feet and 115-foot diameter. The project would also include rehabilitation of an existing 3.0-MG welded steel tank located at the Ojai East Tank site. Rehabilitation activities would include removal of interior and exterior coatings, application of a new epoxy coating to the interior and exterior of the tank, various structural improvements and anchoring to prevent uplift, installation of cathodic protection, and the addition of an exterior ladder. Construction of the new 1.0-MG tank would allow for additional storage and redundancy for Casitas' planned operations in east Ojai and would also allow for the existing 3.0-MG tank to be taken out of service for the proposed rehabilitation activities.

Water used for hydrostatic testing and disinfection of the new and rehabilitated tanks would be dechlorinated and discharged to a local storm drain or sewer in accordance with Casitas' applicable NPDES permit. During construction, workers would park at the Ojai East Tank site.

Treatment

Ojai Water System Wellfield Chloramine Conversion

The project would include converting the treatment system of the OWS Wellfield from chlorine to chloramines. Construction activities would include installation of a new, approximately 2,700-linear-foot, 16-inch discharge line which would connect to the existing water line in Grand Avenue at the northern terminus to the existing San Antonio BPS, located at the OWS Wellfield site; as well as construction of a new free chlorine analyzer, new sample point for chlorine analyzer, new ammonia injection point, and new ammonia storage tanks and dosing pumps at the OWS Wellfield site. The OWS Wellfield chloramine conversion would provide treatment uniformity in Casitas' operations, making OWS water consistent with the water currently provided to existing Casitas customers.

If groundwater is encountered during construction activities or facilities need to be temporarily dewatered, such water would be discharged to an existing retention pond at the OWS Wellfield site (on the west side of San Antonio Creek) or at the San Antonio Pump Plant. Construction workers would park at the OWS Wellfield site.

Pump Stations

Arbolada Booster Pump Station

The project would include construction of a temporary pump station at the northwest corner of the Arbolada Tank site and a new BPS in the southeastern portion of the Arbolada Tank site. The temporary BPS would keep the OWS operational until all project components are complete. The new Arbolada BPS would replace the existing Arbolada BPS (which would be demolished) located at the Arbolada Tank site and Valley View BPS (which would be demolished), located further north on Foothill Road. The replacement of the Arbolada BPS with a redesigned pump configuration would eliminate the need for the aging Valley View BPS.

Table 2 Project Component Construction Durations

Project Component	Construction Duration
Private Drive Pipeline	6 to 8 weeks
Foothill Road Pipeline	6 to 8 weeks
Arbolada and Running Ridge Tanks	3 to 4 months
Ojai East Tanks	6 to 8 months
Ojai Water System Chloramine Conversion	6 to 8 months
Arbolada Booster Pump Station	6 to 8 months

Standard Construction Measures

The proposed project would implement the following measures throughout construction activities.

- **Vibration Best Practices:** To avoid potential vibration-related impacts or effects to adjacently located historic-period buildings, structures, or objects, vibratory rollers would not be used within 37 feet of off-site buildings or structures over 50 years of age. Additionally, when grading or earthwork activities occur within 21 feet of off-site buildings or structures over 50 years of age, only equipment with 100 horsepower or less would be used.
- **Ventura County Air Pollution Control District (VCAPCD) Measures:**
 - **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 PM₁₀-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.
 - **Title 13, Section 2449 – In-Use Off-Road Diesel-Fueled Fleets:** This regulation aims to reduce emissions of nitrogen oxides (NO_x), diesel particulate matter (PM), and other pollutants from in-use off-road diesel vehicles by requiring fleet owners to retrofit, repower, or replace older engines and comply with idling limits and reporting requirements
 - **Title 13, Section 2485 – Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling:** This rule prohibits unnecessary idling of diesel-fueled commercial vehicles to reduce public exposure to toxic diesel exhaust, with specific limits on idling time and exemptions for certain operational needs.

7. Surrounding Land Uses and Setting

The land use setting in the vicinity of the project site is predominantly characterized by rural, low-density residential, and open space uses. Table 3 provides surrounding land uses for each component of the proposed project.

Table 3 Project Site Surrounding Land Uses

Project Component	Surrounding Land Uses
Foothill Road Pipeline	Single-family residences extending along the entirety of the proposed pipeline alignment.
Private Drive Pipeline	Single-family residences to the north, west, and south, and by Foothill Road followed by single-family residences to the east.
Arbolada Tank Demolition	Single-family residences to the west, south, and east, and by Fairview Road followed by single-family residences to the north.
Running Ridge Tank Abandonment	Single-family residences to the south and southeast, and vegetated open space to the west, north, and northeast.
Ojai East Tank Rehabilitation and Construction	Vegetated open space to the south, single-family residences to the west, east, and northeast, and Reeves Road followed by agricultural land (orchards) to the north.
OWS Water System Wellfield Chloramine Conversion	Agricultural land (orchards) to the south and west, Grand Avenue followed by agricultural land (orchards) to the north, and San Antonio Creek to the east. San Antonio Pump Plant is surrounded by agricultural land (orchards) to the south and east, Grand Avenue followed by agricultural land (orchards) to the north, and San Antonio Creek to the west.

8. Other Public Agencies Whose Approval is Required

The proposed project may require the following permits:

- City of Ojai Encroachment Permit
- County of Ventura Transportation Department Encroachment Permit
- General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities
- National Pollutant Discharge Elimination System Permit No. CAG994004 – Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties
- State Water Resources Control Board, Division of Drinking Water, Domestic Water Supply Permit Amendment

Environmental Factors Potentially Affected

This project would potentially affect the environmental factors checked below, involving at least one impact that 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 and Soils | ☐ Greenhouse Gas Emissions | ☐ Hazards and Hazardous Materials |
| ☒ Hydrology and Water Quality | ☐ Land Use and Planning | ☐ Mineral Resources |
| ☒ Noise | ☐ Population and Housing | ☐ Public Services |
| ☐ Recreation | ☐ Transportation | ☐ Tribal Cultural Resources |
| ☐ Utilities and Service Systems | ☐ 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?

Scenic vistas are viewpoints providing expansive views of highly valued landscape for the public benefit. The project site is located in the city of Ojai and unincorporated Ventura County. The County of Ventura General Plan Conservation and Open Space Element identifies scenic resources in the Ojai Valley, including the Topa Topa mountain range, Lake Casitas, and Matilija Lake (County of Ventura 2020a). No portion of the project site is located within the Scenic Resource Protection Overlay Zone for these scenic resources, as delineated in Figure 8-7 of the General Plan Natural Resources Background Report (County of Ventura 2020a). The City of Ojai's 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 means scenic vistas of mountains and ridgelines are commonly obscured by intervening structures and vegetation surrounding the project site. Nevertheless, public rights-of-way adjacent to the project site offer occasional views of the undeveloped Topa Topa Mountains in Los Padres National Forest to the north and of Sulphur Mountain to the south.

The project would involve rehabilitation of one tank, construction of a new tank, and construction of a pump station, as well as abandonment and/or demolition of infrastructure to be replaced. Construction activities would include grading, excavation, trenching, tank and pump station construction, and paving. These activities could temporarily obstruct or degrade scenic vistas for residents and motorists in the project site vicinity due to the presence of construction equipment and machinery within the project site. Following construction, the new underground pipelines would not be visible and would not affect scenic vistas. The new tank and pump station would be aesthetically similar to existing site conditions. The new pump station would be located at the Arbolada site, which contains an existing pump station. The new tank would be located at the Ojai East Tank site, which contains an existing tank. Therefore, the proposed project would have a less than significant impact to scenic vistas during construction and no impact during operation.

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?*

No state scenic highways are visible from the project site. State Route 33 is the closest designated state scenic highway, extending from 6.4 miles north of State Route 150 to the Santa Barbara County line (California Department of Transportation 2018). This stretch of highway is approximately 3.9 miles northwest of the nearest project improvements at the Arbolada Tank and Pump Station site, and obstructed from view by the Topa Topa Mountains. Therefore, the proposed project would not substantially damage scenic resources within 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 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?*

CEQA Guidelines Section 21071 defines an urbanized area as:

1. An incorporated city that has either:
 - a. A population of at least 100,000 persons, or
 - b. A population of less than 100,000 persons if the population of that city and not more than two contiguous incorporated cities combined equals at least 100,000 persons.
2. An unincorporated area that is either:
 - a. Completely surrounded by one or more incorporated cities and both of the following criteria are met:
 - i. The population of the unincorporated area and the population of the surrounding incorporated city or cities equals at least 100,000 persons
 - ii. The population density of the unincorporated area at least equals the population density of the surrounding city or cities.
 - b. Located within an urban growth boundary and has an existing residential population of at least 5,000 persons per square mile.

The project site is located within the incorporated city of Ojai and unincorporated Ventura County. The city of Ojai has a population of 7,637 (United States Census Bureau 2023a), and unincorporated Ventura County is not completely surrounded by one or more unincorporated cities. Therefore, the project site is considered to be located within a non-urbanized area. Because the project site occurs in a non-urbanized area, this analysis evaluates potential degradation of existing visual character.

The project would involve rehabilitation of one tank, construction of a new tank, and construction of a pump station, as well as abandonment and/or demolition of infrastructure to be replaced. Construction of the proposed project would be visible from surrounding land uses and would temporarily alter the existing visual character and quality of the project area and vicinity. A temporary change in visual character would result from the presence of construction equipment and material, stockpiles of soil, and construction vehicles. Construction equipment and materials would be removed from the project site upon completion of construction activities. Following construction, the new pipelines would not substantially alter scenic quality or visual character as the pipelines would be located underground, and the site would be restored to pre-project conditions. Tank and pump station construction would occur at the site of existing infrastructure and would be consistent with the existing visual character of the site. Therefore, the project would not substantially alter the scenic quality or visual character of the project site. Construction and operation of the proposed project would not substantially degrade the existing visual character or quality of public views of the project site and its surroundings. Impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

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

The proposed pipelines would not create a new source of light or glare once construction is complete, as the pipelines would be located underground. The project would involve rehabilitation of one tank, construction of a new tank, and construction of a pump station, as well as abandonment and/or demolition of infrastructure to be replaced. Rehabilitation and the construction of new facilities may involve upgrading lighting fixtures. However, such improvements would be similar to existing infrastructure during operation, and additional lighting beyond what is currently provided is not proposed. There would be no impact regarding operational light and glare.

Proposed project components may create light and glare during construction due to the presence of construction vehicles and equipment. Construction would occur primarily during daytime hours, though late afternoon activities during the winter could require the use of lighting. Any construction lighting used would be shielded to minimize impacts to any nearby receptors as a standard best practice implemented by Casitas. As such, light and glare from construction activities would not substantially disturb sensitive receptors. Therefore, construction activities would be temporary and potential impacts during construction associated with light or glare 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 not currently in agricultural production and does not contain Prime Farmland, Unique Farmland, Farmland of Statewide Importance, or land with a Williamson Act contract (California Department of Conservation 2022). No part of the proposed project is located on forest land or timber land.

Due to the absence of agricultural land at the project site or in the surrounding area, the proposed project would not involve changes to the existing environment which could result in conversion of Farmland to a non-agricultural use. The project would not expand potable water service capacity and, therefore, would not result in or support new residential development leading to the conversion of Farmland to non-agricultural use. The proposed project would not cause the loss of forest land or conversion of forest land to non-forest use. No impact on agricultural 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 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 located 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 “nonattainment” 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 nonattainment for the ozone NAAQS and CAAQS and nonattainment for the particulate matter less than 10 microns in diameter (PM₁₀) CAAQS (CARB 2025). In December 2022, the VCAPCD adopted the 2022 Ventura County AQMP, which provides a strategy for the attainment of federal ozone standards (VCAPCD 2022).

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). In 2024, there were 3,667 cases of Valley Fever reported in California, with 81 of those cases occurring in Ventura County (California Department of Public Health 2025).

Air Emission Thresholds

The VCAPCD's Guidelines recommend specific operational 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 project is in the Ojai Planning Area, the applicable threshold of significance for operational emissions is five or more pounds per day of Reactive Organic Compounds (ROC; also referred to as Reactive Organic Gases) or five or more pounds per day of Nitrogen Oxides (NO_x). Pursuant to the VCAPCD's Guidelines, construction-related emissions of ROC and NO_x are not counted toward the threshold of significance, since these emissions are temporary; however, VCAPCD's Guidelines state if construction would exceed the threshold of significance, standard ROC and NO_x minimization measures listed in Section 7.4.3 of the VCAPCD Guidelines should be applied to minimize construction-related emissions.

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:

- **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 project.
- **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 PM₁₀-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 project 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 VCAPCD's 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 2022 Ventura County AQMP to demonstrate a strategy for, and reasonable progress toward, attainment of the federal 8-hour ozone standard. The 2022 Ventura County AQMP relies on the Southern California Association of Governments' 2020 Regional Transportation Plan/Sustainable Communities Strategy forecasts of regional population growth in its projections for managing Ventura County's air quality.

As discussed in Environmental Checklist Section 14, *Population and Housing*, the proposed project would involve abandonment, demolition, rehabilitation, and new construction of water infrastructure to address insufficient storage capacity in the OWS and provide compatible water treatment to both the Ojai and Casitas systems. The proposed project would not expand system capacity, nor would it generate new housing or businesses. Consequently, it would not contribute directly or indirectly to population growth and would not cause exceedances of the growth forecasts employed in the 2022 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 project would generate short-term emissions associated with project construction and long-term emissions associated with operation of the new pump station. As this project would include several construction components (e.g., pipeline installation, tank demolition, tank construction, tank rehabilitation, and pump station construction), emissions for each component were modeled individually using the California Emissions Estimator Model (CalEEMod) version 2022.1.1.29.

Construction

Project construction would generate temporary air pollutant emissions. These impacts are associated with fugitive dust and exhaust emissions from heavy-duty construction vehicles. Table 4 summarizes the maximum daily pollutant emissions for each project component.

Table 4 Construction Emissions (pounds/day)

Maximum Daily Emissions	ROC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Foothill Road Pipeline	1.17	9.95	13.6	0.03	0.55	0.40
Private Drive Pipeline	1.21	8.87	12.7	0.03	0.48	0.35
Arbolada Tank Demolition	1.81	15.1	22.7	0.04	1.47	0.66
Running Ridge Tank Abandonment	1.69	14.6	19.2	0.03	3.21	1.78
Ojai East Tank Rehabilitation and Construction	3.76	9.64	12.5	0.02	0.63	0.38
OWS Water System Wellfield Chloramine Conversion	0.70	5.62	9.13	0.01	0.48	0.24

ROC: reactive organic compounds; NO_x: nitrogen oxides; CO: carbon monoxide; PM₁₀: particulate matter 10 microns or less in diameter; PM_{2.5}: particulate matter 2.5 microns or less in diameter; SO₂: sulfur dioxide
 See Appendix A for CalEEMod worksheets.

VCAPCD's Ojai Planning Area threshold of five pounds per day for ROC and NO_x does not apply to construction emissions since such emissions are temporary; however, in accordance with VCAPCD Guidelines to minimize construction emissions, construction-related emissions should be mitigated if estimated ROC and NO_x emission exceed the five pounds per day for ROC and NO_x. As shown in Table 4, NO_x emissions would exceed the five pounds per day threshold for each project component. Accordingly, without implementation of standard mitigation measures listed in the VCAPCD Guidelines, this impact would be potentially significant.

With respect to fugitive dust emissions, VCAPCD states significant construction-related air quality impacts could occur if fugitive dust emissions are generated in such quantities as to cause injury, detriment, nuisance, or annoyance to any considerable number of people 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, including those listed within Section 2, *Project Description*, Subsection *Standard Construction Measures*. Following compliance with these measures, construction emissions would not be generated in such quantities as to cause injury, detriment, nuisance, or annoyance to any considerable number of people or to the public, or endanger the comfort, repose, health, or safety of any such person or the public. Given the temporary nature of construction emissions and incorporation of fugitive dust reduction measures through compliance with existing VCAPCD regulations measures, impacts related to fugitive dust would be less than significant.

Operation

The new water infrastructure would not require regular maintenance beyond what is already required for existing infrastructure and therefore, would not generate any new, ongoing maintenance trips or activities. The new pump station would not generate substantial operational emissions because it would be connected to the regional electricity grid, which is increasingly powered by renewable energy. Furthermore, the new pump station would not be used to increase the retail water supply or serve additional customers. Therefore, emissions associated with long-

term project operation and maintenance would remain unchanged from current conditions and would have a less than significant impact on regional air quality.

Mitigation Measure

AQ-1 VCAPCD Construction Mitigation Measures

The following shall be implemented during construction to minimize emissions of ozone precursors.

1. Minimize equipment idling time.
2. Maintain equipment engines in good condition and in proper tune as per manufacturers' specifications.
3. Lengthen the construction period during smog season (May through October), to minimize the number of vehicles and equipment operating at the same time.
4. Use alternatively fueled construction equipment, such as compressed natural gas, liquefied natural gas, or electric, if feasible.

Casitas shall include these measures within the construction contract. Prior to construction, Casitas shall confirm with the construction contractor the fuel used for construction equipment and the construction equipment is in good working condition.

Significance After Mitigation

Based on the VCAPCD Guidelines, the implementation of Mitigation Measure AQ-1 would reduce impacts related to ROC and NO_x emissions to a less-than-significant level.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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

VCAPCD defines sensitive receptors as facilities or land uses which 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 Guidelines include schools, hospitals, and daycare centers (VCAPCD 2003). Potential sensitive receptors in the vicinity of the project site include single-family residences within 0.25 mile. There are no schools, senior centers, nursing homes, hospitals, or churches within 0.25 mile of the project site.

Toxic Air Contaminants

As discussed under Items 3(b) and 3(c), project construction would result in temporary emissions of criteria pollutants, including fugitive dust, ROC, and NO_x. Emissions from construction activities at a given sensitive receptor would occur for only a limited portion of the overall construction period, as construction activities would progress across the project site. Furthermore, compliance with the regulations listed within Section 2, *Project Description*, Subsection *Standard Construction Measures* would minimize emissions of TACs and fugitive dust during construction. Therefore, project construction would not expose sensitive receptors to substantial TAC emissions.

CO Hotspots

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 historically been low enough to the point where VCAPCD monitoring stations throughout the county ceased monitoring ambient CO concentrations in March and July 2004 (VCAPCD 2010).

The proposed project would not require regular maintenance trips beyond existing conditions. Construction activities would cause a temporary increase in vehicle traffic. Because construction is a short-term activity, construction-related traffic impacts with potential to cause temporary CO hotspots would not be substantial. Therefore, the project would not result in CO hotspots on adjacent roadways.

San Joaquin 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. Soil at the project site is already disturbed by construction of roadways and existing water infrastructure. Due to the previous amount of disturbance at the project site, disturbance of soil during construction 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 (VCAPCD 2003). Construction of the proposed project would not result in a comparable amount of ground disturbance. Furthermore, the regulations listed within Section 2, *Project Description*, Subsection *Standard Construction Measures* would reduce fugitive dust generation, which would further minimize the risk of infection. Therefore, construction of the proposed project 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, Valley Fever-specific mitigation measures detailed in the VCAPCD Guidelines would not be required.

Summary

The project would not expose sensitive receptors to substantial pollutant concentrations and impacts 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 proposed pipelines would be installed belowground and would not create objectionable odors during project operation. Operation of the new pump station, tank, and treatment system would not include activities with the potential to create objectionable odors. Project construction could generate odors associated with heavy-duty equipment operation and earth-moving activities. Such odors would be temporary in nature and limited to the duration of construction. Although the new pump station, tank, and treatment system are located near residences, construction activities at these locations would be similar to other construction activities occurring near residences in the city (such as residential and commercial construction) and would not create other emissions, such as those leading to objectionable odors, affecting a substantial number of people. Therefore, 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?	☐	☐	☐	☒

The following analysis is informed by the June 2025 Biological Resources Assessment prepared in support of the proposed project, included as Appendix B.

- 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 Plant Species

No special status plant species were observed on the project site. Furthermore, no special status plant species were determined to have a moderate or high potential to occur within the project site. Special status plant species have specialized habitat requirements, including plant community types, soils, and other elements, which do not occur within the project site. Based on the lack of suitable habitat, no special status plants are anticipated to occur within the project site, and the proposed project would have no impact.

Special Status Wildlife Species

No special status wildlife species were observed on the project site. However, four special status wildlife species were determined to have a moderate potential to occur within the project site: Crotch's bumble bee (*Bombus crotchii*), California legless lizard (*Anniella pulchra*), coastal whiptail (*Aspidoscelis tigris stejnegeri*), and coast patch-nosed snake (*Salvadora hexalepis*).

Elements of suitable habitat for the Crotch's bumble bee, a state Candidate Endangered species, are present within the project site vicinity, specifically within a 50-foot buffer around the OWS Wellfield site where California buckwheat is present, as well as the scrub habitat around the Running Ridge Tank site. Potential impacts to nesting Crotch's bumble bee are not expected because no ground disturbance or vegetation removal activities are proposed at the Running Ridge site and the suitable habitat at the OWS Wellfield site is outside of the project's disturbance area. However, potential impacts to transiting Crotch's bumble bee may occur during worker presence at the Running Ridge site. Should workers inadvertently damage or cause harm to Crotch bumble bee, impacts would be potentially significant.

Elements of suitable habitat for California legless lizard, coastal whiptail, and coast patch-nosed snake, all of which are state Species of Special Concern, are present within the scrub habitat surrounding the Running Ridge Tank site. Potential impacts to these special status reptiles at the Running Ridge tank site are not expected because no ground disturbance or vegetation removal activities are proposed at this site. Therefore, no impact would occur.

Nesting Birds

The project site contains habitat capable of supporting nesting birds, including raptors protected under the California Fish and Game Commission (CFGF) and the Migratory Bird Treaty Act (MBTA). The adjacent native trees, ornamental vegetation and orchards along the project footprint provide suitable nesting habitat for avian species. Specifically, the coast live oak trees and blue gum eucalyptus throughout the project site contain suitable habitat for passerine and raptor species, such as Anna's hummingbird (*Calypte anna*) and red-shouldered hawk (*Buteo lineatus*). In addition, the existing water facilities and road culverts may provide habitat for mud and cavity-nesting birds such as cliff swallows (*Petrochelidon pyrrhonota*) and black phoebe (*Sayornis nigricans*). The project could impact raptors and other nesting birds if construction occurs while they are present within or adjacent to the project footprint, through direct mortality or abandonment of nests. The loss of a nest due to construction activities would be a violation of the MBTA and CFGF Section 3503. Therefore, impacts to nesting birds would be potentially significant.

Mitigation Measures

BIO-1 Worker Environmental Awareness Program

Prior to initiation of ~~construction project~~ activities (including staging and mobilization) ~~at the Running Ridge Tank and OWS Wellfield sites~~, all personnel associated with ~~project activities~~ ~~project construction at these sites~~ shall attend a Worker Environmental Awareness Program (WEAP) training, conducted by a qualified biologist, to aid workers in recognizing special status biological resources which may occur in the project site. This training shall include information about Crotch's bumblebee, special status reptiles (California legless lizard, coast whiptail, and coast patch-nosed snake), nesting birds, and protected trees.

The specifics of this program shall include identification of special status species and habitats, a description of the regulatory status and general ecological characteristics of special status resources, and review of the limits of construction and measures required to avoid and minimize impacts to biological resources within the work area. A fact sheet conveying this information shall also be prepared for distribution to all contractors, their employees, and other personnel involved with construction of the project. Employees shall sign a form provided by the trainer documenting they have attended the WEAP and understand the information presented to them. The crew foreman shall be responsible for ensuring crew members adhere to the guidelines and restrictions designed to avoid impacts to special status species.

BIO-2 Pre-Activity Surveys for Special-Status Reptiles

Within one week prior to the commencement of project activities at the Running Ridge site, a qualified wildlife biologist shall conduct a pre-activity survey in portions of the access and project area at the Running Ridge site containing potentially suitable scrub vegetation for California legless lizard, coastal whiptail, and coast patch-nosed snake. A 50-foot buffer around the Running Ridge site will be surveyed, with inaccessible areas (i.e., private lands) surveyed with binoculars, as practicable. The biologist will document existing conditions and search for California legless lizard, coastal whiptail, and coast patch-nosed snake. If California legless lizard, coastal whiptail, or coast patch-nosed snake are found, and could potentially be impacted by project activities at the Running Ridge site (e.g., trampling), individual animals shall be relocated to similar habitat away at least 100 feet away from project activities. The findings of the pre-activity survey will be provided to Casitas in a summary report prior to implementation of project activities.

BIO-3 Injured or Dead Wildlife

If any special-status wildlife species are found harmed/injured or dead at the Running Ridge Tank Site, the qualified biologist should be notified, and dead or injured wildlife documented immediately. A formal report shall be sent to CDFW within three calendar days of the incident or finding. The report shall include the date, time of the finding or incident (if known), and located of the carcass or injured animal and circumstances of its death or injury (if known).

BIO-2 4 Nesting Bird Season Avoidance

To avoid disturbance of nesting and special status birds, including raptor species protected by the Migratory Bird Treaty Act and California Fish and Game Code Section 3503, activities related to the project including, but not limited to, vegetation removal, ground disturbance, and construction and demolition shall occur outside of the bird breeding season for migratory birds (February 1 through August 31), if practicable.

BIO-3 5 Nesting Bird Survey

If construction must begin during the breeding season, then a pre-construction nesting bird survey shall be conducted no more than five ~~seven~~ days prior to initiation of project activities ~~ground disturbance and vegetation removal activities~~. The nesting bird pre-construction survey shall be conducted on foot inside the project footprint, including a 100-foot buffer (300-foot for raptors), and in inaccessible areas (e.g., private lands) from afar using binoculars to the extent practicable. The survey shall be conducted by a qualified biologist familiar with the identification of avian species known to occur in southern California coastal communities. If nests are found, an avoidance buffer (e.g., 50 feet for common species, 300 to 500 feet for special-status species, and 500 feet for raptors) ~~(dependent upon the species, the proposed work activity, and existing disturbances associated with land uses outside of the site)~~ shall be determined and demarcated at the discretion of the qualified ~~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 or until the young are no longer dependent on the nest, as determined by the qualified biologist. No project ground-disturbing activities shall occur inside this buffer until the avian biologist has confirmed breeding/nesting is completed, and the young have fledged and are no longer dependent on the nest. Encroachment into the buffer shall occur only at the discretion of the qualified biologist during monitoring and with confirmation that nesting is not adversely affected by project activities.

Significance After Mitigation

Implementation of Mitigation Measures BIO-1 through ~~BIO-3~~ BIO-5, which would require a Worker Environmental Awareness Program for construction personnel (BIO-1), pre-activity surveys for special-status reptile species (BIO-2), reporting of injured or dead wildlife (BIO-3), avoidance of construction activities during the nesting bird season (~~BIO-2~~ BIO-4), and pre-construction surveys and establishment of avoidance buffers for nesting birds (should construction occur during the nesting bird season) (~~BIO-3~~ BIO-5) would reduce potential impacts to special status species. Specifically, Mitigation Measures BIO-1, BIO-2, and BIO-3 would reduce impacts to Crotch's bumble bee, California legless lizard, coastal whiptail, and coast patch-nosed snake, and Mitigation Measures BIO-1, BIO-4, and through BIO-3 BIO-5 would ~~all~~ reduce impacts to nesting birds. With implementation of these mitigation measures, impacts would be less than significant with mitigation incorporated.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

- 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?*

No riparian habitat or sensitive plant communities are documented within the project site. Coast live oak woodlands, considered a locally important plant community in Ventura County, are present within a 50-foot buffer of the Ojai East Tank site but outside of the project's disturbance area. Therefore, the proposed project would have no impact on riparian habitat or sensitive plant communities.

NO 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?*

San Antonio Creek, located to the west of the OWS Wellfield site, is subject to the jurisdiction of the United States Army Corps of Engineers, Regional Water Quality Control Board, and California Department of Fish and Wildlife. However, San Antonio Creek is located outside of the project's disturbance area at the OWS Wellfield site. Construction activities would occur outside of riparian vegetation and top of bank associated with San Antonio Creek, and no human traffic or equipment is proposed in jurisdictional features. The proposed project would thus avoid direct impacts to San Antonio Creek.

Indirect impacts from construction materials stored onsite, such as stockpiled materials, construction equipment, and trash, could adversely affect water quality. These impacts may include increased turbidity, altered pH, or decreased dissolved oxygen levels within the water features if runoff occurs during storm events. These indirect impacts would be potentially significant.

Mitigation Measures

BIO-4 6 Jurisdictional Waters Avoidance and Minimization

The construction contractor(s) shall implement the following best management practices during work at the OWS Wellfield site:

- Areas of temporary disturbance shall be minimized to the extent practicable.
- Staging and laydown areas shall occur in unvegetated areas and previously disturbed sites only.
- All vehicles and equipment shall be in good working condition and free of leaks to avoid or minimize the risk of oil, petroleum products, or any other pollutant from contaminating the soil or entering a watercourse (dry or otherwise). When vehicles or equipment are stationary, mats or drip pans shall be placed below vehicles to contain fluid leaks.
- Materials shall be stored on impervious surfaces or plastic ground covers to avoid or minimize effects of any spills or leakage. Material storage shall be at least 100 feet from San Antonio Creek. Any material/spoils from project activities shall be located and stored 100 feet from San Antonio Creek. 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.
- The construction contractor(s) shall provide street sweeping, vacuuming, and rumble plates, as appropriate, to avoid or minimize the off-site tracking of loose construction and landscape materials.
- Avoid or minimize the discharge of silt or pollutants off the site when working adjacent to San Antonio Creek by installing BMPs (e.g., silt barriers, sand bags, straw bales) as appropriate.
- All food related trash shall be disposed of 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 project footprint.
- All re-fueling, cleaning, and maintenance of equipment shall occur at least 100-feet from San Antonio Creek.

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

Significance After Mitigation

Mitigation Measure BIO-1 requires a Worker Environmental Awareness Program for construction personnel, and Mitigation Measure ~~BIO-4~~ BIO-6 includes best management practices to reduce potential indirect impacts to water quality within San Antonio Creek. With implementation of these mitigation measures, impacts to jurisdictional waters would be less than significant with mitigation incorporated.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

- 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 entirety of the project site occurs within an Essential Connectivity Area as mapped in the report, *California Essential Habitat Connectivity Project: A Strategy for Conserving a Connected California* (Spencer et al. 2010). Additionally, San Antonio Creek may operate as a movement corridor for wildlife species; common wildlife adapted to urban and suburban areas (e.g., raccoon and striped skunk) could use the riverine habitat of San Antonio Creek for local movement. The proposed project would not modify San Antonio Creek, nor substantially increase the level of disturbance beyond existing conditions.

The project site is located within sites developed with existing water infrastructure, and no new aboveground infrastructure would occur beyond these existing sites. Proposed project components would be similar in design and scale to existing infrastructure, and would not create a barrier to wildlife movement. Thus, the proposed project would not substantially interfere with wildlife movement, and impacts would be less than significant.

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?*

Protected trees, including California sycamore, coast live oak, and potential historical or heritage trees, were observed within the project site. Impacts to protected trees may include construction equipment compacting soil around the trees as well as disturbance of the crown and the root zone from trenching, grading, and clearance pruning. The proposed project would consist of water infrastructure improvements primarily within the public right-of-way and developed sites with existing water infrastructure.

The Ojai Municipal Code states a permit is required when encroachment to a protected tree dripline is unavoidable. Applications for a permit to impact protected trees must be accompanied by a certified arborist report. The report should list each of the protected trees located within the work area, show the protected tree's location on a development plan, and recommend a program for protecting the trees prior to, during, and after construction. The County of Ventura requires a ministerial permit to be obtained from the County for removal, alteration, or encroachment into the tree protection zone of a tree regulated by the County of Ventura requires a ministerial permit to be obtained from the County. Minor pruning does not require a permit and includes pruning dead

limbs or roots, pruning living limbs or roots that are 20 percent less than the trunk's girth, and pruning living limbs or roots that are less than 20 percent of the tree's overall canopy or root system. The removal, encroachment, or alteration of protected trees that is necessary to construct improvement within the public right-of-way or within a flood control or other public utility right-of-way; and no more than five protected trees from a subject property where the trees deny reasonable access and/or use of the property as permitted by zoning may occur through a ministerial permit process. However, California Government Code Section 53091 exempts location or construction of facilities for the production, storage, or transmission of water, wastewater, or electrical energy by a local agency from requiring a county or city permit.

The Ventura County 2040 General Plan Conservation Element, Ojai Valley Area Plan Conservation and Open Space Section, and Ojai Municipal Code contain policies to protect potentially jurisdictional waters, sensitive local vegetation communities and species, protected trees, and wildlife movement from development. As discussed in Items 4(a) through 4(d), the proposed project is not anticipated to significantly impact these resources. However, the proposed project may result in impacts to protected trees through removal, trimming and/or tree protection zone encroachment at Arbolada Tank and Pump Station, Foothill Drive, Private Drive, and OWS Wellfield. These impacts would be potentially significant.

Mitigation Measures

Mitigation Measure BIO-5 Arborist Study

An Arborist Study shall be completed for any protected trees occurring within or adjacent to (with any portion of the crown overhanging) the project footprint required by the County or the City. The study shall determine the jurisdiction of any trees to be impacted or protected in place. An Arborist Report shall be prepared by a Certified Arborist in compliance with both the City of Ojai and County of Ventura ordinance guidelines. Specifically, the Arborist Report shall include, at minimum:

- An inventory of all trees that are within or adjacent to (with any portion of the crown overhanging) the project footprint, as feasible without trespassing on private lands. Inventory data shall record, at minimum: trunk location, species, diameter at standard height (DBH), height, dripline, mapping, and health and vigor rating.
- Representative photographs of each regulated tree that may be impacted.
- Description of proposed site development activities including, but not limited to, excavation for trenching, any tree trimming for access, and construction access routes.
- A project-specific Tree Protection Plan (TPP) shall be prepared which would at a minimum include site plans, protective tree fencing, the designated tree protection zone (identifying an area sufficiently large enough to protect the tree and its roots from disturbance), activities prohibited/permitted within the tree protective zone, encroachment boundaries, and potential requirements for transplanting or replacement tree plantings.

The Arborist Report shall be completed consistent with the tree ordinance guidelines of the County of Ventura or City of Ojai prior to the start of any tree-disturbing construction activities, as necessary.

Significance After Mitigation

Implementation of Mitigation Measure ~~BIO-5~~ BIO-7, which would require preparation of an Arborist Study and associated avoidance, minimization, and tree replacement measures for impacts to

protected trees, would reduce potential impacts involving conflict with local policies or ordinances protecting biological resources. With implementation of this mitigation measure, impacts would be less than significant with mitigation incorporated.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

- 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 site is not within an area of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan. Therefore, the project would not conflict with any such provisions, and no impact would occur.

NO IMPACT

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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?	☐	☐	☒	☐

This section analyzes the project’s potential impacts related to cultural resources, including historical and archaeological resources as well as human remains. The analysis in this section is based on the Casitas-Ojai Water System Consolidation Project Historic Properties Identification Report (Consolidation Project HPIR) prepared for the Casitas-Ojai Water System Consolidation Project by Rincon in June 2025. The investigation consisted of a California Historical Resources Information System (CHRIS) records search through the South Central Coastal Information Center (SCCIC), a Sacred Lands File (SLF) search through the California Native American Heritage Commission (NAHC), Native American outreach and local interested party outreach, a geoarchaeological review, a pedestrian field survey, and an updated historical evaluation of the Ojai Water System (OWS). The Consolidation Project HPIR contains sensitive and confidential information concerning archaeological sites. As such, it has not been appended to this IS-MND.

The OWS was previously recorded and evaluated in 2018 for a previous project, the OWS Improvements Project. The Cultural Resources Technical Report for the OWS Improvements Project, prepared by Rincon in 2018, recommended the system as ineligible for listing in the National Register of Historic Places (NRHP) and the California Register of Historical Resources (CRHR). An evaluation of the OWS for local register eligibility was not completed as part of the previous project documentation.

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

In accordance with California Office of Historic Preservation (OHP) guidance, Rincon re-evaluated the historic-age elements of the OWS within project site, as well as the system as a whole, due to the passage of more than five years since the original study. The updated evaluation confirms the 2018 findings: the OWS and its components are not eligible for listing in the NRHP, CRHR, or applicable local registers. Neither the OWS system nor any of the historic age components of the OWS within the project site are considered historical resources pursuant to CEQA.

Construction-related vibration could result in potential impacts to historic-period buildings, structures, or objects within the project site's vicinity. As discussed in Section 2, *Project Description*, Subsection *Standard Construction Measures*, to avoid potential vibration-related impacts or effects to adjacently located historic-period buildings, structures, or objects, vibratory rollers would not be used within 37 feet of off-site buildings or structures over 50 years of age. Additionally, when grading or earthwork activities occur within 21 feet of off-site buildings or structures over 50 years of age, only equipment with 100 horsepower or less would be used. These construction measures would ensure impacts associated with construction vibration would be less-than-significant.

As such, the project would result in a less than significant impact to historical resources as defined in Section 15064.5(b) of the CEQA Guidelines.

LESS-THAN-SIGNIFICANT IMPACT

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

No archaeological resources were identified within or immediately adjacent to the project site as a result of the CHRIS records search, SLF search, Native American and local interested party outreach, or field survey completed as part of the Consolidation Project HPIR. The geoarchaeological review indicates the project site has low potential to contain intact archaeological deposits. This is due to alluvial and colluvial landforms with large clasts, which reflect high-energy environments not conducive to preserving archaeological materials. As such, the potential for encountering intact archaeological deposits during project construction is considered low.

Based on the results of the Consolidation Project HPIR, no archaeological resources were identified in the project site, and the project would not result in significant impacts to known archaeological resources pursuant to CEQA. Nevertheless, there is a potential for unanticipated archaeological resources to be encountered during ground-disturbing activities. Impacts to unanticipated archaeological resources during project construction, such as damage of the resources, would be potentially significant.

Mitigation Measure

CUL-1 Unanticipated Discovery of Cultural Resources

In the event of the unanticipated discovery of archaeological materials, the construction contractor shall immediately cease all work activities in the area (within approximately 100 feet) of the discovery until it can be evaluated by an archaeologist who meets the Secretary of the Interior's Professional Qualification Standards (qualified archaeologist). Prehistoric archaeological materials might include obsidian and chert flaked-stone tools (e.g., projectile points, knives, scrapers) or toolmaking debris; culturally darkened soil ("midden") containing heat-affected rocks, artifacts, or shellfish remains; stone milling equipment (e.g., mortars, pestles, handstones, or milling slabs); and battered stone tools, such as hammerstones and pitted stones. Historic-period materials might include stone or concrete footings and walls; filled wells or privies; and deposits of metal, glass, and/or ceramic refuse. Construction should not resume until the qualified archaeologist has conferred with Casitas on the significance of the resource.

If it is determined the discovered archaeological resource constitutes a historical resource or unique archaeological resource under CEQA, avoidance and preservation in place is the preferred manner of mitigation. Preservation in place maintains the important relationship between artifacts and their

archaeological context and also serves to avoid conflict with traditional and religious values of groups who may ascribe meaning to the resource. Preservation in place may be accomplished by, but is not limited to, avoidance, incorporating the resource into open space, capping, or deeding the site into a permanent conservation easement. In the event preservation in place is demonstrated to be infeasible and data recovery through excavation is the only feasible mitigation available, an Archaeological Resources Data Recovery and Treatment Plan shall be prepared and implemented by the qualified archaeologist in consultation with Casitas. The Archaeological Resources Data Recovery and Treatment Plan shall provide for the adequate recovery of the scientifically consequential information contained in the archaeological resource. The qualified archaeologist and Casitas shall consult with appropriate Native American representatives in determining treatment for prehistoric or Native American resources to ensure cultural values ascribed to the resource, beyond those of scientific importance, are considered.

Significance After Mitigation

Implementation of Mitigation Measure CUL-1, which would require implementation of unanticipated discovery protocol in the event cultural resources are discovered during construction, would reduce potential impacts to archaeological resources. With implementation of this mitigation measure, impacts would be less than significant with mitigation incorporated.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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

The Consolidation Project HPIR did not indicate human remains are present or likely to be present within the project site. However, the discovery of human remains is always a possibility during ground disturbing activities. If human remains are found, the State of California Health and Safety Code Section 7050.5 states no further disturbance shall occur until the county coroner has made a determination of origin and disposition pursuant to PRC Section 5097.98. In the event of an unanticipated discovery of human remains, the County Coroner must be notified immediately. If the human remains are determined to be prehistoric, the Coroner must notify the Native American Heritage Commission, which would determine and notify a most likely descendant (MLD). The MLD must complete the inspection of the site and provide recommendations for treatment to the landowner within 48 hours of being granted access. With adherence to existing regulations, potential impacts to human remains 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?	☐	☐	☐	☒

- 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?*

Construction

Energy use during project construction would be primarily in the form of fuel consumption to operate heavy equipment, light-duty vehicles, and machinery. Temporary grid power may also be provided to construction trailers or electric construction equipment. Energy use during construction would be temporary in nature. Heavy-duty equipment used would be typical of similar-sized construction projects in the region. In addition, the construction contractor(s) would be required to comply with regulations listed within Section 2, *Project Description*, Subsection *Standard Construction Measures*. Adherence to these regulations would minimize unnecessary fuel consumption. Furthermore, heavy-duty equipment would be subject to the United States Environmental Protection Agency (USEPA) Construction Equipment Fuel Efficiency Standard, which would also minimize inefficient, wasteful, or unnecessary fuel consumption by requiring construction contractor(s) to meet specific performance standards which promote the use of cleaner technologies and more efficient fuel usage practices. These practices would result in efficient use of energy necessary to perform construction of the project. In the interest of cost-efficiency, construction contractor(s) also would not utilize fuel in a wasteful or unnecessary manner. Therefore, construction would not involve the inefficient, wasteful, and unnecessary use of energy. No construction impact would occur.

Operation

Operation of the new pump station would require approximately 3,229 kWh per year, which represents a 5 percent decrease from existing conditions, as the proposed project would replace two BPSs (Arbolada [old] and Valley View) with one improved BPS (Arbolada [new]). This energy demand would be supplied by the regional electricity grid, which is increasingly powered by renewable energy. In addition, the project would restore lost efficiency in the water distribution system, which would improve energy efficiency. The project would not be used to increase the retail

water supply or serve additional customers. Operational trips associated with maintenance of the infrastructure would be the same as under existing conditions.

As such, project operation would not result in a potential impact due to wasteful, inefficient, or unnecessary consumption of energy resources, and 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?*

Senate Bill 100 mandates 100 percent clean electricity for California by 2045. Because the proposed project would be powered by the existing electricity grid, the project would eventually be powered by renewable energy mandated by Senate Bill 100 and would not conflict with this statewide plan. Casitas and the City of Ojai do not have any specific renewable energy or energy efficiency plans with which the project could comply. The County of Ventura's 2040 General Plan, which serves as Ventura County's Climate Action Plan, does not contain any regulations, goals, or policies which would apply to the project. Thus, the project would not conflict with or obstruct the state plan for renewable energy; therefore, 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 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☐	☒
e. Have soils incapable of adequately supporting the use of septic tanks or alternative 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?	☐	☒	☐	☐

- 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?*

Pursuant to state law, the California Geological Survey has designated Alquist-Priolo Earthquake Fault Zones for the Ojai and Matilija Quadrangles in which the project site is located. No portion of the project site is located in an Alquist-Priolo earthquake fault zone. The nearest Alquist-Priolo earthquake fault zones to the project site are the Mission Ridge Fault Zone, approximately 1.4 mile southwest of the project site in the unincorporated community of Meiners Oaks, and the San Cayetano Fault Zone, approximately 1.5 miles east of the project site in unincorporated Ventura County (California Department of Conservation 2025a).

Although the project site is located in a seismically active area, the proposed project would not expose people or habitable structures to seismically induced risk. The proposed project involves water infrastructure improvements; it does not involve construction of or modification to any habitable structures. While the project may be subject to strong ground shaking in the event of an earthquake, it would not be subject to unusual levels of ground shaking as compared to the rest of the region. The engineering design of the proposed water infrastructure improvements would consider the seismic environment and would comply with applicable seismic design standards. In the event an earthquake compromised any project component during operation, Casitas would temporarily cease operations and conduct emergency repairs as soon as possible. Therefore, while the project site is located within a seismically active area, the project would not directly or indirectly cause potential substantial adverse effects, including risk of loss, injury, or death, involving rupture of a known earthquake fault or seismic ground shaking. 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 ground failure, including liquefaction?*

Liquefaction occurs when strong, cyclic motions during an earthquake cause water-saturated soils to lose their cohesion and take on a liquid state. Liquefied soils are unstable and can subject overlying structures to substantial damage. In the event of a major earthquake, seismically induced liquefaction would be expected throughout the city of Ojai and Ventura County.

Liquefaction hazard zones within the project site include the Ojai East Tank and OWS Wellfield sites (California Department of Conservation 2025a). At these locations, project development would consist of a new water tank and rehabilitated water tank (at the Ojai East Tank site) and a new water treatment system (at the OWS Wellfield site). In the event seismically induced liquefaction compromises the proposed water infrastructure improvements during operation, Casitas would temporarily cease operations and conduct emergency repairs as soon as possible. The project involves construction of water infrastructure and would not involve placement of habitable structures within a liquefaction-prone area, thereby minimizing the potential to result in loss, injury, or death involving seismic-related ground failure due to liquefaction. As a result, the proposed project would not directly or indirectly cause potential substantial adverse effects, including the risk

of loss, injury, or death involving seismic-related ground failure, including liquefaction. 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 landslides?*

The Private Drive, Foothill Road, and Running Ridge sites are adjacent to hillside areas identified as Landslide Zones (California Department of Conservation 2025a). In general, a landslide event may be triggered by removing material down-slope of potentially unstable materials; placing fill or heavy structures upslope of potentially unstable materials; or applying substantial amounts of water to the surface or subsurface to the point where it decreases the strength of potentially unstable geologic areas.

The proposed project would not include habitable structures and would not expose people to loss, injury, or death involving landslides. Although portions of the project site are adjacent to hillside areas, the proposed project would not disturb or burden potentially unstable geologic areas. As discussed under Items 7(a.1) and 7(a.2), all project activities would be constructed in compliance with applicable standards for seismic integrity and safety, which includes the potential for landslides. The proposed project would not have the potential to cause substantial adverse effects involving landslides. Impacts involving landslides would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

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

Soil erosion or the loss of topsoil may occur when soils are disturbed but not secured or restored, to the point where wind or rain events may mobilize disturbed soils, resulting in their transport off the project site. Construction activities involving soil disturbance, such as excavation, stockpiling, and grading could result in increased erosion and sediment transport by stormwater to surface waters.

The proposed project would minimize soil erosion via implementation of Best Management Practices (BMPs), in accordance with the General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit). Compliance with the Construction General Permit requires the development of a Stormwater Pollution Prevention Plan (SWPPP) to reduce erosion and topsoil loss from stormwater runoff. The SWPPP would include additional erosion control BMPs, such as covering of stockpiles, use of desilting basins, limitations on work during high-wind events, and post-construction revegetation and drainage requirements. With adherence to the permit requirements, the project would not result in substantial soil erosion or loss of topsoil, and 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?*
- d. Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?*

Unstable soils are those soils which are physically unsuitable to support buildings, roads, utilities, or other development-related improvements, or which have the potential for slope failure, erosion, or

subsidence. As discussed under Items 7(a.3) and 7(a.4), the proposed project would not exacerbate soil instability in areas of the project site at risk of liquefaction, lateral spreading or landslide. The project site is not located in an area subject to subsidence (County of Ventura 2020d). Expansive soils are those soils which can undergo substantial changes in volume (i.e., shrink-or-swell potential), due to variations in moisture content. Expansive soils have been documented throughout Ventura County, including portions of the Ojai Valley (County of Ventura 2020d), and may be present in localized areas of the project site.

During pipeline construction, trench spoils would be temporarily stockpiled within the construction staging and storage area, then used to backfill the trench after pipeline placement; backfilling would be conducted to meet proper compaction requirements. Depending on applicable requirements at the time of construction, slurry backfill may be used. The proposed water infrastructure improvements, including the new treatment system, tank, and pump station, would occur on sites where similar infrastructure currently exists. As discussed previously, although the project site is located in a seismically active area, the project is not anticipated to adversely affect soil stability or increase the potential for local or regional landslides, subsidence, liquefaction, or collapse. The project would not include habitable structures and would therefore not create substantial direct or indirect risks to life or property beyond existing conditions.

The project would not compromise soil stability and there would be no impact involving unstable or expansive soils.

NO IMPACT

- 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?*

The proposed project would not include the use of septic tanks or alternative wastewater disposal systems. No impact would occur.

NO IMPACT

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

Paleontological resources, or fossils, are the evidence of once-living organisms preserved in the rock record. They include both the fossilized remains of ancient plants and animals and the traces thereof (e.g., trackways, imprints, burrows). Paleontological resources are not found in “soil” but are contained within the geologic deposits or bedrock underlying the soil layer. Typically, fossils are greater than 5,000 years old (i.e., older than middle Holocene in age) and are typically preserved in sedimentary rocks. Although rare, fossils can also be preserved in volcanic rocks and low-grade metamorphic rocks under certain conditions (Society of Vertebrate Paleontology [SVP] 2010). Fossils occur in a non-continuous and often unpredictable distribution within some sedimentary units, and the potential for fossils to occur within sedimentary units depends on several factors. It is possible to evaluate the potential for geologic units to contain scientifically important paleontological resources, and therefore evaluate the potential for impacts to those resources and provide mitigation for paleontological resources if they are discovered during construction of a development project.

Rincon evaluated the paleontological sensitivity of the geologic units underlying the project site to assess the project's potential for significant impacts to scientifically important paleontological resources. The analysis was based on the results of a paleontological locality search and a review of existing information in the scientific literature regarding known fossils within geologic units mapped at the project site. According to the SVP (2010) classification system, geologic units can be assigned a high, low, undetermined, or no potential for containing scientifically significant nonrenewable paleontological resources. Following the literature review, a paleontological sensitivity classification was assigned to each geologic unit mapped within the project site. This criterion 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. The potential for impacts to significant paleontological resources is based on the potential for ground disturbance to directly impact paleontologically sensitive geologic units.

Rincon requested a records search from the Natural History Museum of Los Angeles County on May 15, 2025, which recovered no known paleontological localities within the project site (Bell 2025). Known fossil localities occur nearby from the Sespe Formation, Coldwater Sandstone, and unnamed Pleistocene sediments.

The project site is situated in the Transverse Ranges geomorphic province, one of the eleven geomorphic provinces in California (California Geological Survey 2002). The Transverse Ranges extend approximately 275 miles west-east from Point Arguello in Santa Barbara County, east to the San Bernardino Mountains, and south to the Anacapa-Santa Monica-Hollywood-Raymond-Cucamonga fault zone (Yerkes and Campbell 2005). The Transverse Ranges are composed of Proterozoic to Mesozoic intrusive crystalline igneous and metamorphic rocks overlain by Cenozoic marine and terrestrial sedimentary deposits and volcanic rock (Norris and Webb 1976). Locally, the project site lies in the Ojai Valley, a small east-west-running valley running between the Topa Topa Mountains to the north and Black Mountain to the south.

The project site is located in the *Ojai* and *Matilija* United States Geological Survey 7.5-minute topographic quadrangles. The geology of the region surrounding the project site was mapped by Tan and Irvine (2005), Tan and Jones (2006), and Bedrossian et al. (2010). These authors identified three geologic units underlying the various locations of the project site: Quaternary active alluvial valley deposits, Quaternary active alluvial fan deposits, and Sespe Formation. They also identified two other geologic units within 100 feet of the project site, Quaternary active wash deposits and Rincon Shale. The proximity of these additional geologic units to the project site means they could be affected by project construction due to errors in geologic mapping due to their relatively large scale or their presence at shallow depths in the subsurface. Therefore, all five of these geologic units are assessed herein.

Quaternary active alluvial valley deposits underlie the majority of the project site, including the entirety of the Foothill Road and Private Drive pipelines, Arbolada Tank, and OWS Wellfield sites (Figure 7). Quaternary active alluvial valley deposits consist of unconsolidated sandy clay with occasional gravel (Tan and Irvine 2005; Tan and Jones 2006; Bedrossian et al. 2010). Quaternary active alluvial fan deposits underlie the Ojai East Tank site (Figure 7) and consist of sandy clay with smaller amounts of gravel, cobbles, and boulders (Tan and Irvine 2005; Bedrossian et al. 2010). Quaternary active wash deposits are found within San Antonio Creek between the OWS wellfield and a laydown site and less than 100 feet north of the Ojai East Tank site (Figure 7). These sediments consist of unconsolidated gravel, sand, and silt (Tan and Irvine 2005). Quaternary young wash deposits are unlikely to be impacted by project construction, because they are restricted to the active creek channel. Quaternary active alluvial valley deposits, Quaternary active alluvial fan

deposits, and Quaternary active wash deposits are too young (i.e., less than 5,000 years old; SVP 2010) to preserve paleontological resources and are considered to have low paleontological sensitivity. However, Holocene-aged sediments may become old enough (i.e., 5,000 years old) to preserve paleontological resources in the subsurface. Pleistocene-aged sediments are known to preserve paleontological resources in Ventura County (Jefferson 2010; Paleobiology Database 2025). Therefore, such sediments should be considered to have high paleontological sensitivity. The relatively narrow width of the Ojai Valley and lack of known Pleistocene localities within the Ojai Valley suggests this transition may occur as deep as 10 feet within the project site. However, this transition depth is an estimate, so Quaternary active alluvial valley deposits, Quaternary active alluvial fan deposits, and Quaternary active wash deposits, should be considered to have low paleontological sensitivity from 0 to 10 feet below the surface and undetermined paleontological sensitivity greater than 10 feet below the surface.

The Sespe Formation underlies the Running Ridge Tank site and is also found just north of the Arbolada Tank site (Figure 7). This geologic unit consists of red sandstone with lesser amounts of conglomerate and mudstone (Tan and Jones 2006). The Sespe Formation is Oligocene in age and has produced vertebrate-bearing fossil localities in Ventura County, including mammals (Primates, Carnivora, Artiodactyla, Perissodactyla, Rodentia), reptiles (lizards, snakes, turtles), and invertebrates (Bivalvia, Crustacea, Gastropoda) (Kelly et al. 1991; Paleobiology Database 2025). Given this fossil-producing history, the Sespe Formation is assigned high paleontological sensitivity.

The Rincon Shale is mapped less than 100 feet south of the Ojai East Tank site (Figure 7) and consists of early Miocene-aged shale and siltstone (Tan and Irvine 2005). The Rincon Shale has produced numerous invertebrate-bearing fossil localities (Paleobiology Database 2025). Given this fossil-producing history, Rincon Shale is assigned high paleontological sensitivity.

Ground-disturbing activities within previously undisturbed sediments with high or undetermined paleontological sensitivity could result in significant impacts to paleontological resources. Impacts would be significant if construction activities result in the destruction, damage, or loss of scientifically important paleontological resources and associated stratigraphic and paleontological data. Table 5 presents paleontological sensitivity and potential impacts to paleontological resources for each project component.

Table 5 Project Component and Paleontological Sensitivity

Project Component	Depth of Excavation/Activity	Underlying Geologic Formation	Impact
Private Drive Pipeline	10 feet, open-cut trenching	Quaternary active alluvial valley deposits (low paleontological sensitivity)	No impact due to low sensitivity and previous disturbance of sediments
Foothill Road Pipeline	10 feet, open-cut trenching	Quaternary active alluvial valley deposits (low paleontological sensitivity)	No impact due to low sensitivity and previous disturbance of sediments
Arbolada Tank	Grading	Quaternary active alluvial valley deposits (low paleontological sensitivity)	No impact due to low sensitivity and previous disturbance of sediments
Ojai East Tanks	Grading	Quaternary active alluvial fan deposits (low paleontological sensitivity)	No impact due to low sensitivity and previous disturbance of sediments
Ojai Water System Chloramine Conversion	10 feet, open-cut trenching for the proposed discharge line	Quaternary active alluvial valley deposits (low paleontological sensitivity)	No impact due to low sensitivity and previous disturbance of sediments
Arbolada Booster Pump Station	10 feet, excavation and grading	Quaternary active alluvial valley deposits (low paleontological sensitivity)	No impact due to low sensitivity and previous disturbance of sediments

As discussed in Table 5, none of the proposed activities are expected to impact previously undisturbed sediments with high or undetermined paleontological sensitivity. Nonetheless, trenching for the new pipelines in Foothill Road and Private Drive may reach the transition depth at which Quaternary active alluvial valley deposits become old enough to preserve paleontological resources. Since this 10-foot-deep transition depth was an estimate, it is possible, though unlikely, sediments old enough to contain paleontological resources could be impacted. Therefore, impacts to paleontological resources would be potentially significant.

Mitigation Measure

GEO-1 Unanticipated Fossil Discovery

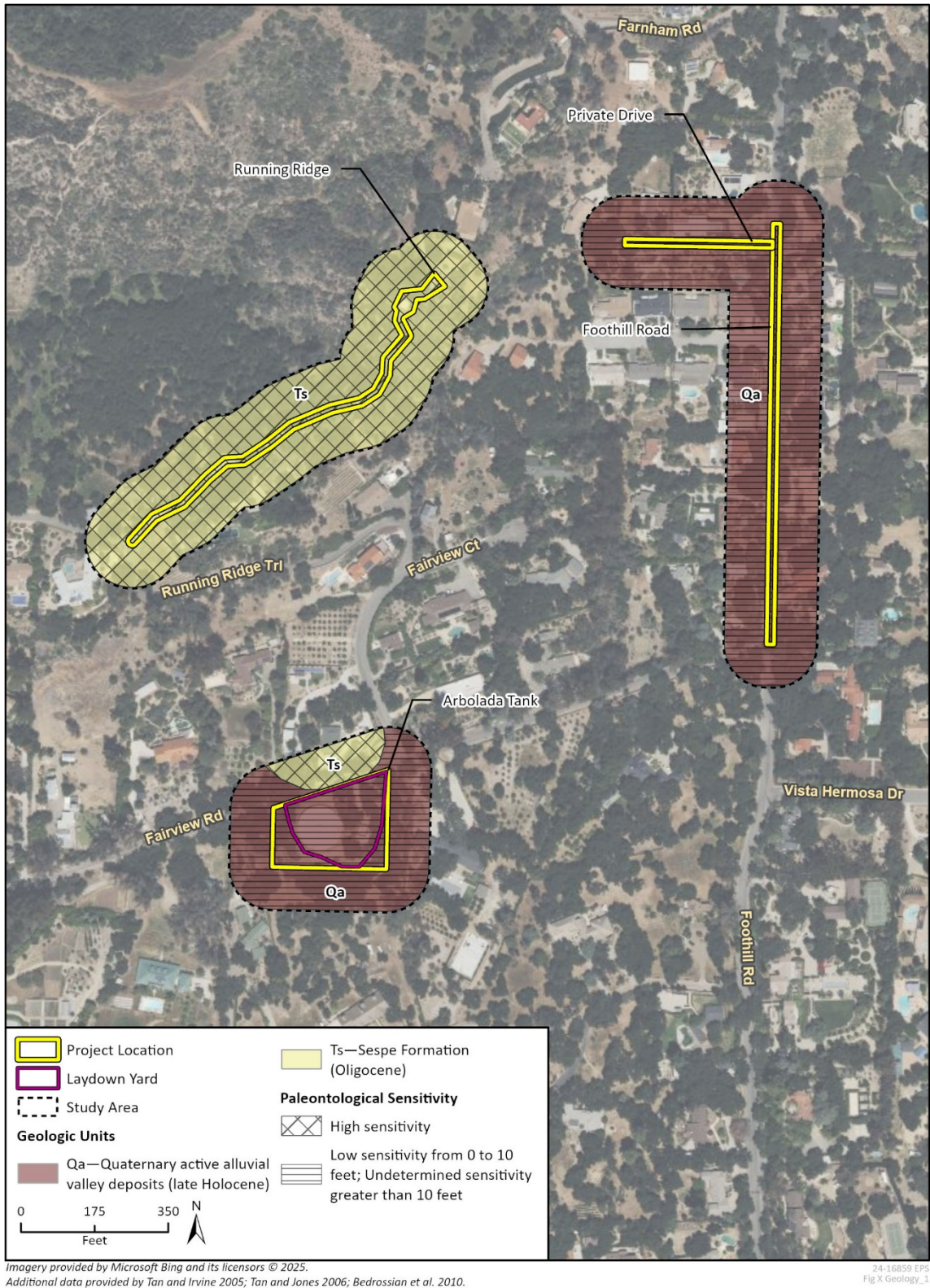
Casitas shall include a standard inadvertent discovery clause in every construction contract to inform contractors of this requirement. If a potential fossil is discovered during project construction, construction activity within 50 feet of the find shall cease until the discovery is examined by a Qualified Professional Paleontologist. If the find is determined to be significant, the Qualified Professional Paleontologist shall direct all mitigation efforts related to paleontological resources consistent with the SVP (2010) standards, which may include, but are not limited to: paleontological monitoring; fossil salvage, preparation, and curation; and reporting to summarize the paleontological mitigation efforts.

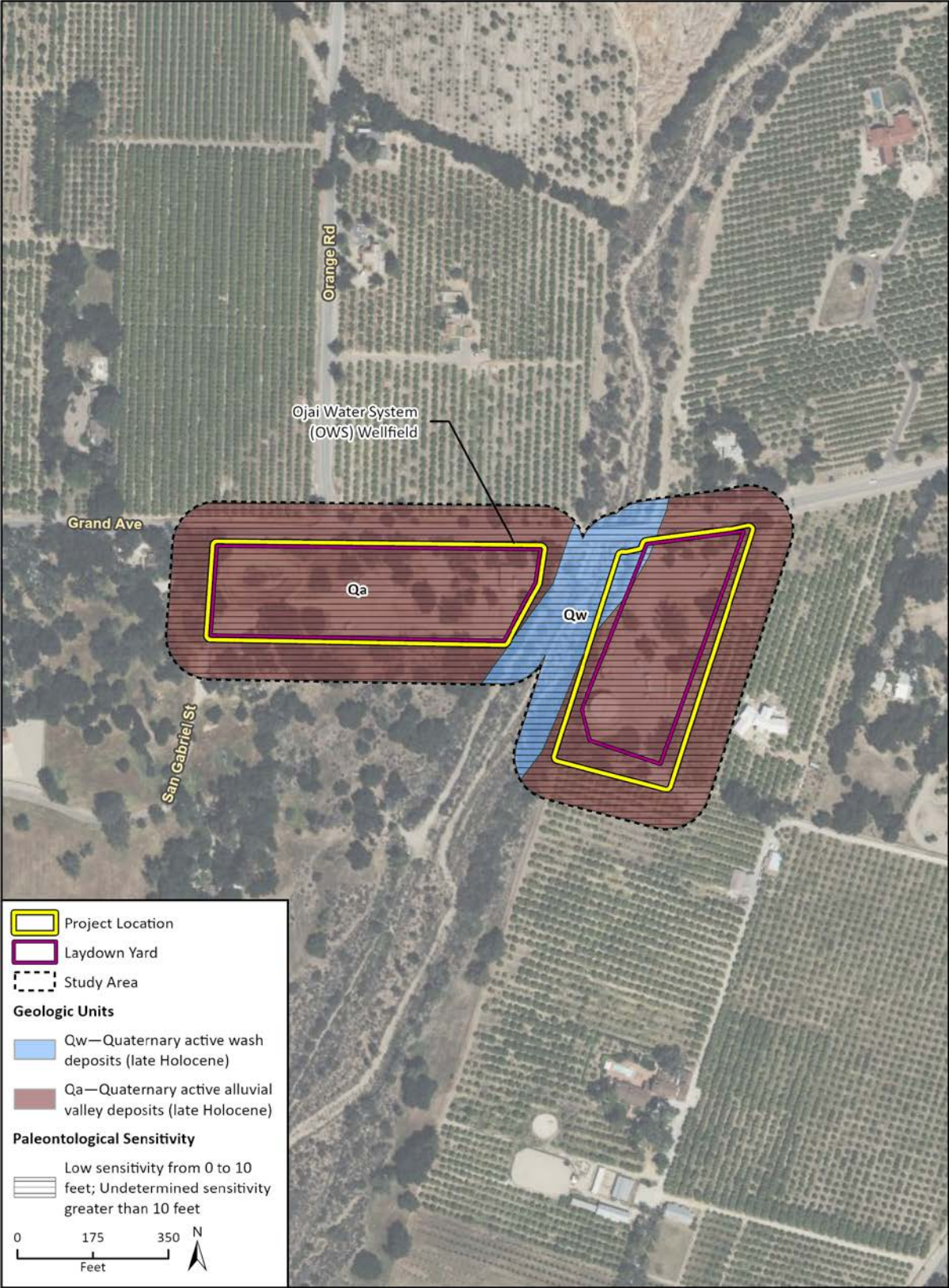
Significance After Mitigation

Implementation of Mitigation Measure GEO-1, which would require an unanticipated fossil discovery protocol in the event paleontological resources are discovered during construction, would reduce potential impacts to paleontological resources. With implementation of this mitigation measure, impacts would be less than significant with mitigation incorporated.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

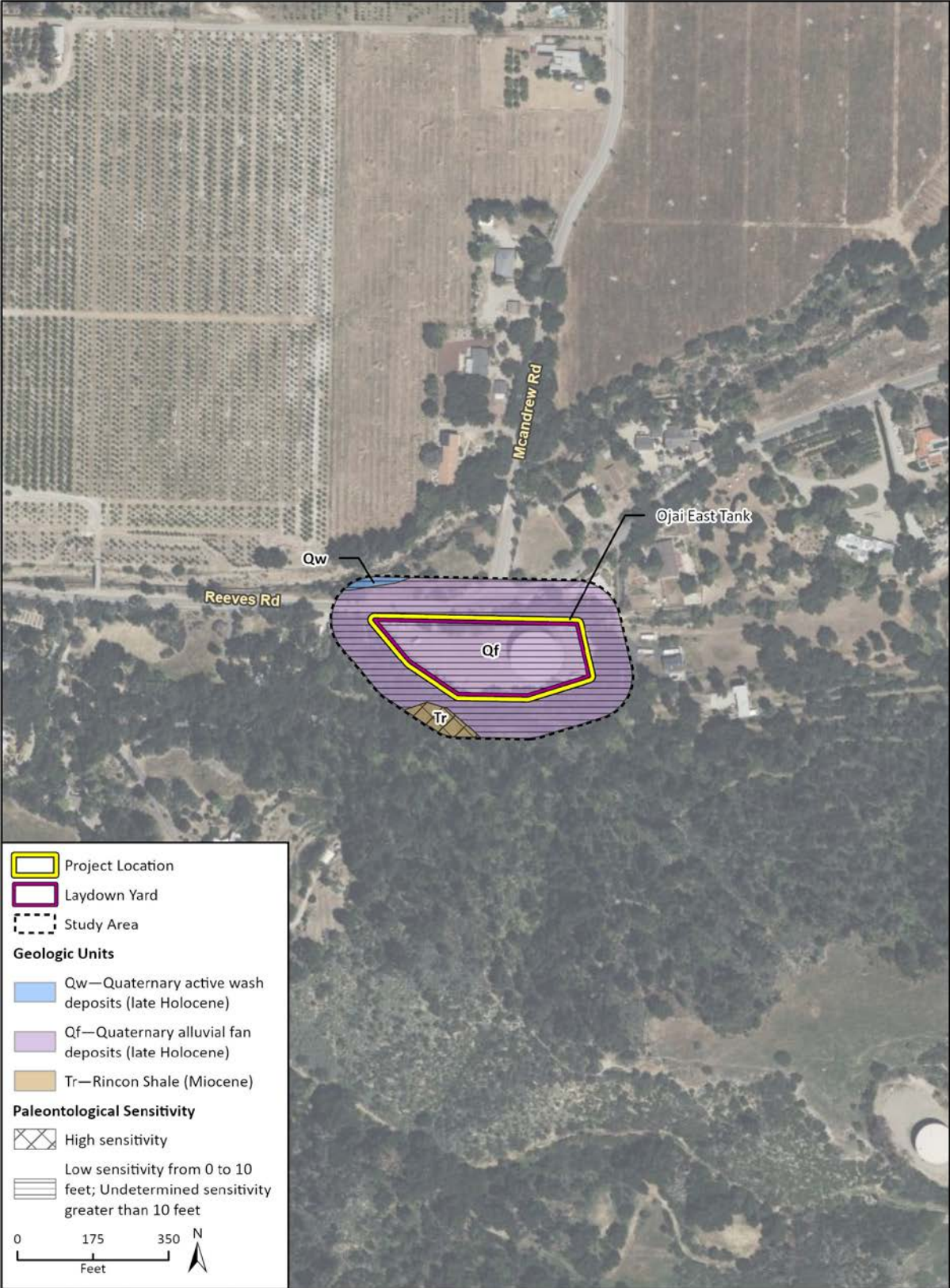
Figure 7 Geologic Map of the Project Site





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Additional data provided by Tan and Irvine 2005; Tan and Jones 2006; Bedrossian et al. 2010.



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?	☐	☐	☒	☐

- a. *Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?*
- b. *Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?*

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 greenhouse gas (GHG) emissions contributing to the warming of Earth’s surface. GHG emissions occur both naturally and as a result of human activities, such as fossil fuel burning, decomposition of landfill wastes, raising livestock, deforestation, and some agricultural practices. GHGs produced by human activities include carbon dioxide (CO₂), methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride.

To date, Casitas and Ventura County have not adopted GHG thresholds of significance. In 2011, VCAPCD published *Greenhouse Gas Thresholds of Significance Options for Land Use Development Projects in Ventura County*, which identifies options for potential significance thresholds for GHG emissions, but has not yet adopted specific significance thresholds. In the absence of any adopted numeric threshold, the significance of the proposed project’s GHG emissions is evaluated consistent with *CEQA Guidelines* Section 15064.4(b) by considering whether the proposed project complies with applicable plans, policies, regulations, and requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. Therefore, the significance of the proposed project’s potential impacts regarding GHG emissions and climate change is evaluated based on consistency with plans and policies adopted for the purposes of reducing GHG emissions and mitigating the effects of climate change. GHG emissions from the construction of the proposed project are provided for informational purposes. The applicable adopted regulatory plan to reduce GHG emissions is the County of Ventura 2040 General Plan, which serves as Ventura County’s Climate Action Plan (CAP). In addition, CARB’s 2022 Scoping Plan contains guidance on GHG-reduction; however, this guidance is related to transportation electrification, vehicle miles traveled (VMT) reduction, and building decarbonization for operational residential and mixed-use

projects and therefore is not applicable to the proposed project (CARB 2022). Accordingly, the proposed project's potential to conflict with a GHG reduction plan is based solely on its potential to conflict with the Ventura County 2040 General Plan.

GHG emissions associated with project construction were estimated using CalEEMod, as described in Item 3(b) in Section 3, *Air Quality*. As described therein, emissions associated with long-term project operation and maintenance would remain unchanged from existing conditions. Therefore, the proposed project's operational emissions are not quantified and are rather discussed qualitatively. Construction emissions were amortized over the proposed project's estimated 30-year lifetime because construction emissions are confined to a relatively short period of time in relation to the overall life of the proposed project. Table 6 shows the proposed project's estimated construction emissions amortized over a 30-year project lifetime.

Table 6 Estimated Construction GHG Emissions

Project Component	Project Emissions (metric tons CO ₂ e)
Foothill Road Pipeline	46
Private Drive Pipeline	21
Arbolada Tank Demolition	109
Running Ridge Tank Abandonment	233
Ojai East Tank Rehabilitation and Construction	170
OWS Water System Wellfield Chloramine Conversion	153
Total	732
Total Amortized over 30 Years	24.4 per year

CO₂e = carbon dioxide equivalent; OWS = Ojai Water System

Carbon dioxide equivalent is a metric used to compare the emissions of various greenhouse gases based on their global warming potential relative to carbon dioxide.

See Appendix A for CalEEMod worksheets.

As shown in Table 6, construction would generate a total of approximately 732 metric tons, or 24.4 metric tons per year of CO₂ equivalent amortized over a 30-year period. GHG emissions from construction would be short-term in nature, lasting only for the duration of the construction period, and would not represent a long-term source of GHG emissions. Operational GHG emissions would remain the same as existing conditions.

Appendix B, Climate Change, of the County's 2040 General Plan identifies a goal of promoting water efficiency, resiliency, and conservation for the purposes of GHG emissions reduction. The purpose of the proposed project is to address insufficient storage capacity in the OWS and provide compatible water treatment capabilities to the Casitas and OWS water systems, thereby increasing the overall efficiency and resiliency of the local water supply system. Accordingly, the proposed project would be consistent with the County of Ventura's 2040 General Plan. Therefore, the proposed project's impact related to conflicts with an applicable GHG reduction plan 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?*

Construction of the proposed project would temporarily increase the transport and use of hazardous materials at the project site through the operation of vehicles and equipment, consistent with other construction projects in the region. Such substances include diesel fuel, oil, solvents, and other similar materials brought onto the construction site for use and storage during the construction period. These materials would be contained within vessels specifically engineered for safe storage and would not be transported, stored, or used in quantities which would pose a significant hazard to the public or construction workers. Furthermore, project construction would require the excavation and transport of paving materials and soils which could possibly be contaminated by vehicle-related pollution (e.g., oil, gasoline, diesel, and other automotive chemicals). All such paving and soils removed during construction would be transported and disposed of in accordance with applicable codes and regulations to minimize potential hazards to construction workers and the surrounding community.

Operation of the proposed project would involve the maintenance of water infrastructure and would not require the use, storage, or disposal of hazardous materials. Therefore, the proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

- 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?*

The use, transport, and storage of hazardous materials during construction of the proposed project (e.g., diesel fuel, oil, solvents, and other similar materials) could introduce the potential for an accidental spill or release to occur. As discussed under Item 9(a), operation and maintenance of the project would not involve the routine transport, use, or disposal of hazardous materials. Therefore, potential impacts are limited to the construction period.

The presence of hazardous materials during project construction activities could result in an accidental upset or release of hazardous materials if they are not properly stored and secured. However, hazardous materials used during project construction would be disposed of off-site in accordance with all applicable laws and regulations. Additionally, the proposed project would adhere to BMPs required by the SWPPP, which include hazardous material management measures. Therefore, construction 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 nearest school to the project site is Topa Topa Elementary School, located approximately 0.8 mile northwest of the OWS Wellfield site. Therefore, the proposed project would not handle hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school. No impact would occur.

NO 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?*

Government Code Section 65962.5 requires the California Environmental Protection Agency to develop an updated Hazardous Waste and Substances Sites List, also known as the Cortese List. The California Department of Toxic Substances Control (DTSC) is responsible for a portion of the information contained in the Cortese List; other state and local government agencies are also required to provide additional hazardous material release information for the Cortese List. The analysis for this section included a review of the following resources on May 21, 2025, to provide hazardous material release information:

- State Water Resources Control Board (SWRCB) GeoTracker database (SWRCB 2025a)
- DTSC EnviroStor database (DTSC 2025)

Based upon review of these databases, there are no hazardous material sites mapped at, adjacent to, or within 1,000 feet of the project site. Therefore, the project would not be located on a site included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5. No impact would occur.

NO IMPACT

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

The project site is not located within an airport land use plan or within two miles of a public or private airport (Ventura County Airport Land Use Commission 2000). The nearest airport is the Santa Paula Airport, approximately 10 miles southwest of the Ojai East Tank site. As a result, the proposed project would have no impact related to safety hazards for people residing or working in the project area due to proximity to an airport.

NO IMPACT

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

Construction activities associated with the proposed project would require temporary lane closures which could impede emergency response or emergency evacuation. Casitas would implement standard traffic controls to minimize impacts to the traveling public and potential emergency evacuation routes. A segment of the Foothill Road pipeline alignment would require flagger-controlled traffic controls, and a minimum of one lane of traffic in each direction would be open during project construction. Open-cut trenching activities and paving and ground restoration activities would be mobile and constantly moving in a linear path along the pipeline alignment. Thus, lane closures would only affect one specific area of the project's alignment for a short period of time.

As discussed in Section 17, *Transportation*, the project would also implement traffic control plans, where necessary, to detour traffic lanes around the work area. Project operation and maintenance would not impede or interfere with emergency plans. Impacts related to emergency response plans and emergency evacuation plans during project construction 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?*

As discussed in detail in Section 20, *Wildfire*, the Private Drive, Foothill Road, and Running Ridge sites are located in State Responsibility Areas designated as Very High Fire Hazard Severity Zones (California Department of Forestry and Fire Protection [CAL FIRE] 2024). The Ojai East Tank site is located directly adjacent to a State Responsibility Area designated as a Very High Fire Hazard Severity Zone (CAL FIRE 2024).

Project construction would involve the use of heavy equipment and machinery at the project site, including within or adjacent to areas designated as Very High Fire Hazard Severity Zones. However, the project would comply with regulations related to fire hazards and wildfire safety, including mandatory use of spark arrestors (PRC Section 4442), maintenance of fire suppression equipment during the highest fire danger period (PRC Section 4428), and adherence to standards for conducting construction activities on days when a burning permit is required (PRC Sections 4427 and 4431). Therefore, although portions of the project site are located within an area susceptible to wildfire, the proposed project would not increase fire risks at the project site or surrounding areas. Potential construction impacts associated with wildland fire would be less than significant.

Following the completion of project construction, operational activities would be similar to existing conditions, and the new infrastructure would be designed in accordance with the California Building Code, which includes provisions for fire-resistant construction materials. Project operational activities would be associated with the ongoing maintenance of water supply infrastructure, and would not include additional operational or maintenance activities beyond existing conditions which could pose a substantial risk of wildfire ignition. No operational impact would occur.

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?*

Excavation, grading, and other activities associated with construction of the proposed project would result in soil disturbance which could cause water quality violations through potential erosion and subsequent sedimentation of receiving water bodies. Indirect impacts from construction materials stored onsite, such as stockpiled materials, construction equipment, and trash, could adversely affect water quality. Both direct and indirect impacts to water quality may include increased turbidity, altered pH, or decreased dissolved oxygen levels within San Antonio Creek if runoff occurs during storm events.

The proposed project would require coverage under the Construction General Permit and development and implementation of a SWPPP. The SWPPP would minimize the amount of sediment and other pollutants associated with the construction site discharged in stormwater runoff. Additionally, Casitas would obtain coverage under NPDES Permit No. CAG994004 (Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties), which would require extracted groundwater (if dewatering is required) to be treated to remove pollutants (e.g., sediments, metals, hydrocarbons) before it is discharged.

As such, the proposed project would be consistent with water quality standards and waste discharge requirements. As discussed in the impact analyses for Section 7, *Geology and Soils*, and Section 9, *Hazards and Hazardous Materials*, implementation of SWPPP BMPs would reduce the extent of sedimentation and hazardous materials entering San Antonio Creek. However, indirect impacts to water quality due to the proximity to San Antonio Creek may nevertheless occur, and would be potentially significant.

Mitigation Measure

BIO-4 6 Jurisdictional Waters Avoidance and Minimization

Refer to Item 4(c) in Environmental Checklist Section 4, *Biological Resources*.

Significance after Mitigation

Mitigation Measure ~~BIO-4~~ **BIO-6** includes best management practices to reduce potential indirect impacts to water quality within San Antonio Creek. With implementation of these mitigation measures, impacts to water quality would be less than significant with mitigation incorporated.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

- 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?*

In September 2014, the California Legislature enacted comprehensive legislation aimed at strengthening local control and management of groundwater basins throughout the state. Known as the Sustainable Groundwater Management Act, the legislation provides a framework for sustainable management of groundwater supplies by local authorities, with a limited role for State intervention when necessary to protect the resource. The project site overlies the Ojai Valley Groundwater Basin, which is designated as a “high priority” basin and is managed by the Ojai Basin Groundwater Management Agency (Ojai Basin Groundwater Management Agency 2022).

The project would involve abandonment, rehabilitation, and construction of water infrastructure for the purpose of storing and distributing potable water. The proposed project would not introduce a demand for groundwater supplies. If groundwater dewatering is required during construction based on site conditions, the project would adhere to applicable rules and regulations related to discharge. Depending on the quality of the dewatered groundwater, water may be discharged to an existing retention pond at the OWS Wellfield site or at the San Antonio Pump Plant and allowed to percolate into the Ojai Valley Groundwater Basin. The volume of dewatered groundwater expected to be encountered during construction would be minimal and not sufficient to impede sustainable groundwater management. Potential impacts 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?*
- 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?*

The proposed project would not alter the course of a stream or river and would not introduce substantial new impervious surfaces resulting in substantial erosion, siltation, or flooding on or off the site. Construction of the new pipelines would not increase impervious surfaces because the pipelines would be installed under existing roadways. The new treatment system, tank, and pump station would occur on sites with existing infrastructure and would not substantially change the drainage characteristics of these sites. After construction, the drainage pattern at the project site would be similar to pre-construction conditions.

In addition, as discussed for Item 10(a), the project would not result in water quality degradation as the project would not introduce a permanent source of polluted runoff. The proposed project would not exceed the capacity of existing or planned stormwater drainage systems and would not provide substantial additional sources of polluted runoff. Impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

- 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?*

Most of the project site is located outside of a flood hazard area. The OWS Wellfield site is located within Zone AE (defined as an area subject to inundation by the one percent annual chance flood), and the Ojai East Tank site is located within Zone AE and Zone B (defined as an area between the limits of the 100-year and 500-year floods) (Federal Emergency Management Agency 2014 and 2021).

As discussed for Items 10(c.i) through 10(c.iii), potential impacts related to drainage pattern alterations from the proposed project would be less than significant. The proposed project would not substantially alter existing drainage patterns at the project site or in the surrounding area. The proposed pipeline at the OWS Wellfield site would be located underground and would not impede or redirect flood flows. The proposed treatment system improvements at the OWS Wellfield site, as well as the new tank at the Ojai East Tank site, would not impede or redirect flood flows as the sites are already developed with existing water infrastructure (thus the project would not include a new encroachment into a floodplain) and the project would not include substantial grading or alteration of flow paths to the point where flows would be redirected when compared to existing conditions. Therefore, impacts 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 project site is located approximately 12 miles inland and is not in a tsunami inundation zone (California Department of Conservation 2025b). The nearest large surface water body is Lake Casitas, located approximately 5.2 miles southwest of the project site. The project site is not within a seiche inundation zone, given the distance of the project site to Lake Casitas and intervening topography. Portions of the project site at the OWS Wellfield and Ojai East Tank sites are located in Special Flood Hazard Areas as designated by the Federal Emergency Management Agency (Federal Emergency Management Agency 2014 and 2021).

An extreme flood event could inundate the OWS Wellfield and Ojai East Tank sites. However, chemical treatment facilities at the OWS Wellfield site would include secondary containment designed to catch leaks or spills from the primary tank, and would be anchored to a concrete pad. These project design features would reduce the potential for the release of pollutants in the unlikely event the OWS Wellfield site is inundated. The proposed improvements at the Ojai East Tank site would not involve construction or installation of any structures or facilities using, processing, or storing pollutants which could be released in the event of inundation. Therefore, the proposed project would not risk release of pollutants due to inundation. 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?*

The project site is under the jurisdiction of RWQCB Region 4 (Los Angeles Region). The RWQCB provides permits for projects potentially affecting surface waters and groundwater locally, and is responsible for preparing the Water Quality Control Plan for the Coastal Watersheds of Los Angeles and Ventura Counties (Basin Plan). The Basin Plan designates beneficial uses of water in the region and establishes narrative and numerical water quality objectives. The State has developed total maximum daily loads (also called TMDLs), which are a calculation of the maximum amount of pollutants a water body can have and still meet water quality objectives established by the region. San Antonio Creek, which is located adjacent to the OWS Wellfield site, is listed as impaired for nitrogen, total dissolved solids, dissolved oxygen, and other pollutants (SWRCB 2024a). With adherence to the requirements of the Construction General Permit and NPDES Permit No. CAG994004 (Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties), impacts to water quality within

San Antonio Creek from construction and operation of the proposed project would be reduced. Nevertheless, water quality impairments may still occur during construction activities, and this impact would be potentially significant.

The project would not increase groundwater extraction rights nor result in groundwater extraction beyond the historical baseline and, therefore, would not obstruct implementation of the Groundwater Sustainability Plan for the Ojai Valley Groundwater Basin.

Mitigation Measure

BIO-4 6 Jurisdictional Waters Avoidance and Minimization

Refer to Item 4(c) in Environmental Checklist Section 4, *Biological Resources*.

Significance after Mitigation

Mitigation Measure ~~BIO-4~~ BIO-6 includes best management practices to reduce potential indirect impacts to water quality within San Antonio Creek. With implementation of these mitigation measures, impacts involving conflict with or obstruct implementation of a water quality control plan would be less than significant with mitigation incorporated.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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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 proposed project would consist of water infrastructure improvements located within paved roadways (e.g., new pipelines) and located on sites currently containing water infrastructure (e.g., new tank, rehabilitated tank, and new pump station). The presence of construction-related equipment and workers would temporarily change the existing character of the vicinity to a construction zone. However, construction staging would maintain local access for residences along the proposed pipeline alignments and other project components to the extent practicable throughout short-term construction of the proposed project. The proposed project would not have the potential to 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?*

Per California Government Code Section 53091, building and zoning ordinances of a county or city do not apply to the location or construction of facilities for the production, storage, or transmission of water, wastewater, or electrical energy by a local agency. Nonetheless, the proposed project has been evaluated for consistency with applicable land use plans and policies adopted for the purpose of avoiding or mitigating environmental effects.

The project supports the goals and policies of both the Ventura County 2040 General Plan (2020d) and Ojai General Plan (1987), particularly those related to water supply reliability and water infrastructure. Applicable goals and policies include:

City of Ojai

- **Policy:** The City shall ensure that adequate supplies of water be available to all City residents and uses requiring water.

- **Program:** Coordination between the City and all water agencies and companies shall be maintained, and the City shall work together with any involved entities to enhance the quality and quantity of water in the Ojai Valley.
- **Policy:** The City shall identify the sources and availability of water, flood potential, and sources of potential damage to the City's water supply and quality in order to maintain the optimum quality of water in the City and its watershed.

County of Ventura

- **Policy WR-1.8: Water Supplier Consolidation.** The County shall encourage the consolidation of water suppliers where necessary to ensure all residents are receiving water of adequate quality and quantity, to promote management efficiencies, and to encourage sharing of local resources and enhancement of managerial and technical expertise and capacity.

The proposed project would integrate the OWS with the Casitas Water System to address insufficient storage capacity in the OWS and provide compatible water treatment to both systems. Thus, the proposed project would directly further these policies related to provision of adequate water supplies to Ojai residents, enhancement of water quality and quantity for Ojai residents, and consolidation of water suppliers to ensure all Ventura County residents receive water of adequate quality and quantity.

There would be no conflicts with land use plans, policies, or regulations of the City of Ojai or County of Ventura. Therefore, the project would not 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. No impact would occur.

NO IMPACT

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?*

Mineral resources in Ventura County consist of aggregate resources, more commonly known as construction grade sand and gravel, as well as petroleum resources in the form of oil and gas deposits. The project site is located within Mineral Resource Zone 1 (defined as an area where adequate geologic information indicates no significant mineral deposits are present), Mineral Resource Zone 3 (defined as an area containing known mineral deposits, which may qualify as mineral resources), and Mineral Resource Zone 4 (defined as an area where geologic information does not rule out either the presence or absence of mineral resources) (County of Ventura 2020a).

The proposed project would not involve mineral extraction or changes in land use affecting the availability of mineral resources. Furthermore, the proposed project would involve water infrastructure upgrades at existing infrastructure facility sites, and would not develop new areas where mineral resources may be present. The proposed project would not require a supply of mineral resources beyond sand and gravel used to conduct road resurfacing and provide fill materials. Therefore, the project would not result in the loss of availability of a known mineral resource or a locally important mineral resource recovery site. No impact 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?	☐	☐	☐	☒

- 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?*

Overview of Noise

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 they are consistent with the human hearing response. The equivalent noise level (L_{eq}) is one of the most frequently used noise metrics; it considers both duration and sound power level. The L_{eq} is defined as the single steady-state A-weighted sound level equal to the average sound energy over a time period. When no time period is specified, a 1-hour period is assumed. The L_{max} is the highest noise level within the sampling period.

Threshold of Significance

Noise exposure goals for various types of land uses reflect the varying noise sensitivities associated with those uses and their associated sensitive receivers. Pursuant to Policy HAZ-9.2 of the County's 2040 General Plan, construction noise must be evaluated in accordance with the County's *Construction Noise Threshold Criteria and Control Plan* (County of Ventura 2020c). The County's *Construction Noise Threshold Criteria and Control Plan* implements a daytime construction noise threshold criteria of either a 55 dBA L_{eq} or an ambient L_{eq} plus 3 dB hourly noise level, whichever is

greater (County of Ventura 2020c). Based on the *Construction Noise Threshold Criteria and Control Plan*, the following land uses are considered sensitive receivers for noise (County of Ventura 2010):

- Hospitals and nursing homes are considered noise-sensitive receivers at all times.
- Single-family and multi-family residences are considered noise-sensitive receivers from 7:00 pm to 7:00 am.
- Hotels and motels are considered noise-sensitive receivers from 7:00 pm to 7:00 am.
- Schools, churches, and libraries are considered noise-sensitive receivers when in use from 7:00 am to 10:00 pm.

The closest sensitive receivers to the project site include:

- Single-family residences located adjacent to the Private Drive and Foothill Road sites;
- Single-family residences located approximately 60 feet east, 125 feet southwest, and 40 feet north of the Arbolada Tank site;
- Single-family residences within the Running Ridge site;
- A single-family residence adjacent to the Ojai East Tank site; and
- A single-family residence located approximately 100 feet east of the OWS Wellfield site.

There are no hospitals, nursing homes, hotels, motels, schools, churches, or libraries within 0.25 mile of the project site. Construction of the proposed project would occur from 8:00 am to 4:30 pm and therefore would not take place during the time of day in which the County considers residential uses to be noise-sensitive. Therefore, these criteria are not applicable to the proposed project.

Article 11 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. While 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 the provisions of the ordinance. Accordingly, these criteria are not applicable to the proposed project.

Chapter 5-11 of the City of Ojai’s Municipal Code enforces noise regulations, including a 55 dB and 45 dB daytime and nighttime noise standard, respectively, for residential areas and a 65 dB and 55 dB daytime and nighttime noise standard, respectively, for commercial and industrial areas. However, Section 5-11.05(c) of the City of Ojai’s Municipal Code exempts construction activities occurring between 7:00 am and 5:00 pm. Construction of the proposed project would occur from 8:00 am to 4:30 pm and therefore would take place within the City-approved timeframe for construction noise. Accordingly, the City’s quantitative noise thresholds are inapplicable to the proposed project.

Construction Noise

Construction activities would generate temporary noise, exposing sensitive receptors to increased noise levels from the use of construction equipment. Each phase of construction has a specific equipment mix and associated noise characteristics, depending on the equipment used. For assessment purposes, construction noise for each project component was estimated using the Federal Highway Administration’s Roadway Construction Noise Model. Each phase was modeled

assuming the five loudest pieces of construction equipment for each project component would operate simultaneously. Construction equipment was derived from an equipment list provided by Casitas.

Typical construction projects have long-term noise averages which are lower than louder short-term noise events due to equipment moving from one point to another on the site, work breaks, and idle time. Additionally, due to the dynamic nature of a construction site, noise levels for stationary construction are calculated from the center of the activity. Thus, noise levels generated at the Arbolada Tank site, Running Ridge site, Ojai East Tank site, and OWS Wellfield site are calculated from the center of each of the construction locations.

Construction noise levels at the Private Drive and Foothill Road sites are evaluated based on the distance from the centerline of these roadways to the adjacent residences. Multiple single-family residences are present adjacent to both Private Drive and Foothill Road, and as pipeline construction progresses and construction equipment is moved, construction would expose adjacent residences to varying construction noise levels depending the portion of the pipelines being constructed. To conservatively calculate construction noise levels at these residences, construction noise levels are presented based on the closest distance to a residence the construction equipment would operate. However, the overall noise exposure for an individual residence would vary as construction moves along the pipeline alignments. Construction noise levels for the proposed project are presented in Table 7.

Table 7 Construction Noise Levels

Project Component	Nearest Receptor (feet) ¹	dBA L _{eq} 8-hour	Jurisdiction
Private Drive Pipeline ²	10	99.9	Ventura County
Foothill Road Pipeline ²	10	101.2	Ventura County and City of Ojai
Arbolada Tank and BPS ³	40	79.1	City of Ojai
Running Ridge Tank ³	10	77.4	Ventura County
Ojai East Tank ³	10	75.2	Ventura County
OWS Wellfield Chloramine Conversion ³	100	73.7	City of Ojai

¹ Distances are to the property line of the nearest receptors

² The noise values for Private Drive and Foothill Road pipelines are based on the closest distance to a residence construction equipment would operate.

³ The noise values for Arbolada Tank and BPS, Running Ridge Tank, Ojai East Tank, and OWS Wellfield Chloramine Conversion are based on distances from the center of construction to the nearest receptor.

dBA = A-weighted equivalent continuous sound level; BPS = booster pump station; OWS = Ojai Water System

Source: Appendix B

Construction noise impacts at residences near the Private Drive and Foothill Road sites would be temporary and short-term because construction would be continuously moving along the pipeline alignments. Similarly, construction noise impacts at residences proximate to the Arbolada Tank site, Running Ridge Tank site, Ojai East Tank site, and OWS Wellfield site would be temporary in nature and limited to the duration of construction activities at each location. Pursuant to the County's *Construction Noise Threshold Criteria and Control Plan*, residential uses are not considered sensitive noise receivers between 7:00 am and 7:00 pm. Project construction would occur between 8:00 am to 4:30 pm. As such, the proposed project's construction activities would not result in substantial noise at a sensitive receiver.

In addition, because no hospitals, nursing homes, hotels, motels, schools, churches, or libraries are located within 0.25 mile of the project site, construction noise would not exceed the County's quantitative noise threshold for daytime construction activities at these receivers. As previously described, the City exempts construction activities from its noise thresholds between the hours of 7:00 am and 5:00 pm. Therefore, project construction activities would be exempt from the City's noise thresholds.

Given the temporary nature of construction noise, construction of the proposed project would have a less-than-significant impact related to temporary increases in ambient noise levels in excess of standards established in a local general plan or noise ordinance.

Operational Noise

The Private Drive and Foothill Road pipelines would not generate operational noise. The Arbolada Tank would be demolished and the Running Ridge tanks would be abandoned and therefore would not generate operational noise. The Arbolada Tank site BPS would replace the existing Arbolada BPS and therefore would not introduce additional noise associated with BPS infrastructure. The new and rehabilitated tanks at the Ojai East Tank site would be used for water storage and would not generate additional permanent operational noise. The OWS Wellfield Chloramine Conversion would not generate substantial additional permanent noise on site as the ammonia tanks would be used for storage and the new dosing pumps are a negligible source of operational noise. Operational trips associated with maintenance of the infrastructure would be the same as under existing conditions and therefore no additional vehicle noise during operation would be generated. Therefore, project operation would not generate substantial on-site operational noise levels at the nearest sensitive receptors, and impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

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

Groundborne vibration consists of oscillatory waves moving through the ground from a source to adjacent buildings or structures. The primary concern from vibration comes from its potential to cause structural damage. Typically, groundborne vibration generated by manmade activities attenuates rapidly as distance from the source of the vibration increases. For the purposes of this analysis, vibration amplitudes are expressed in peak particle velocity (PPV) and described in inches per second (in/sec). PPV is often used as it corresponds to the stresses experienced by buildings. For the purposes of this analysis, the vibration thresholds outlined in the Federal Transit Administration's Transit Noise and Vibration Assessment Manual are utilized, which are shown in Table 8.

Table 8 Groundborne Vibration Architectural Damage Thresholds

Building Category	PPV (in/sec)
I. Reinforced concrete, steel, or timber (no plaster)	0.5
II. Engineered concrete and masonry (no plaster)	0.3
III. Nonengineered timber and masonry buildings	0.2
IV. Buildings extremely susceptible to vibration damage	0.12
in/sec = inches per second; PPV = peak particle velocity	
Source: Federal Transit Administration 2018	

The greatest sources of vibration during construction activities would be the use of a vibratory roller during construction of the Private Drive and Foothill Road pipelines, which could be used as close as 15 feet to existing structures. At 15 feet, a vibratory roller would result in a vibration level of 0.45 PPV in/sec, which would exceed the Federal Transit Administration's construction vibration damage criteria threshold of 0.2 PPV in/sec for non-engineered timber and masonry buildings. This threshold is used as the criteria to evaluate residential structures (Federal Transit Administration 2018; Appendix B). Accordingly, use of a vibratory roller on Private Drive and Foothill Road could result in a potentially significant impact related to the generation of groundborne vibration.

Construction at other portions of the project site would not require use of a vibratory roller and would occur at greater distances to existing structures than construction at Private Drive and Foothill Road. The next closest distance construction equipment could operate to a structure is at the Ojai East Tank site, where construction equipment could operate as close as 25 feet to existing residences. At 25 feet, heavy-duty construction equipment such as a large bulldozer used at the Ojai East Tank site could result in a vibration level of 0.089 PPV in/sec which would not exceed Federal Transit Administration thresholds (Federal Transit Administration 2018; Appendix B). Other non-vibratory roller heavy-duty construction equipment would result in similar or lesser vibration levels compared to a large bulldozer. Therefore, at locations other than Private Drive and Foothill Road, vibration impacts would be less than significant.

Mitigation Measure

NOI-1 Groundborne Vibration Reduction

To reduce vibration levels generated at structures on contiguous parcels to the Private Drive and Foothill Road sites, the following measure shall be implemented during construction of the Private Drive and Foothill Road pipelines:

- Construction activities using a roller shall be conducted with a static or pneumatic roller in lieu of a vibratory roller.

This measure shall be shown within the construction contract for the project and reviewed by the construction contractor prior to the start of construction. Casitas shall verify the construction contractor has implemented this requirement prior to the start of excavation activities and prior to the start of paving activities at the Private Drive and Foothill Road sites by confirming the construction equipment meets the above requirements.

Significance After Mitigation

Mitigation Measure NOI-1 would require construction at Private Drive and Foothill Road to utilize a static or pneumatic roller in lieu of a vibratory roller. Static rollers rely on the weight of the machine itself to exert pressure and compact materials instead of vibrations like a vibratory roller, and therefore static rollers result in minor vibration levels. Pneumatic equipment, which uses air for compaction, does not provide a substantial source of groundborne vibration (California Department of Transportation 2020). With implementation of Mitigation Measure NOI-1, groundborne vibration levels at Private Drive and Foothill Road would be minimized and impacts related to groundborne vibration during construction would be reduced to a less-than-significant level.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

- 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?*

The project site is not located within an airport land use plan or within two miles of a public or private airport (Ventura County Airport Land Use Commission 2000). The nearest airport is the Santa Paula Airport, located approximately 10 miles southwest of the Ojai East Tank site. Therefore, the proposed 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

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)?*

The proposed project does not propose construction of new homes or businesses and would therefore not directly induce population growth in the Ojai and Ventura County areas.

Although the proposed project would expand the conveyance capacity of existing water infrastructure by increasing the diameter of the pipelines currently serving existing customers and adding new ancillary features, such as a tank and pump station, the purpose of the water infrastructure improvements is to address insufficient storage capacity in the OWS and provide compatible water treatment to both the Casitas and Ojai systems. The project would not result in the acquisition of additional water supplies and would not expand service beyond areas presently served by the existing infrastructure. Furthermore, the pipelines, pump station, and tanks would be maintained by existing Casitas employees and would not indirectly induce population growth as a result of new employment opportunities. Therefore, the project would not indirectly support population growth. No impact related to population growth would occur.

NO IMPACT

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

The proposed project would primarily be constructed within existing roadways and existing Casitas-owned properties and does not include any features with potential to displace any existing housing or people. No impact 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?	☐	☐	☐	☒

a.1-5. 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 fire protection, police protection, schools, parks, and/or other public facilities?

The proposed project does not include any features or facilities requiring additional or unusual fire or police protection resources. It is expected construction workers would be local to the city of Ojai and the surrounding area, and as discussed in Environmental Checklist Section 14, *Population and Housing*, project construction and operation would not generate new population growth. The existing Casitas workforce would operate the proposed project. The proposed project would not change existing demand for public services because population growth would not result from construction of the proposed project, thus, the proposed project would not result in a commensurate increase in demand for public services. No impact would occur.

NO IMPACT

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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 Environmental Checklist Section 14, *Population and Housing*, the proposed project would not directly or indirectly support population growth. Therefore, the proposed project 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 project 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?*

Local access to the project site would be provided by Foothill Road, Fairview Road, Grand Avenue, and Reeves Road. There are no dedicated bicycle facilities, pedestrian sidewalks, or transit stops located on roadways within or adjacent to the project site. The proposed project involves construction and operation of potable water infrastructure which would not conflict with adopted policies, plans, or programs addressing the circulation system, including public transit, bicycle, or pedestrian facilities. The proposed pipeline alignments would be placed along existing roadways and in public rights-of-way; and infrastructure improvements, such as the new pump station and tank, would be located on sites with existing water system infrastructure.

Full street closures during project construction would not be necessary, as the pipeline trench would be on one side of the street. Traffic control would be set up to allow one travel lane with flaggers to maintain vehicle, transit, bicycle, and pedestrian access to the greatest extent practicable during construction while maintaining worker and public safety. As discussed in Section 9, *Hazards and Hazardous Materials*, open-cut trenching activities and paving and ground restoration activities would be mobile and constantly moving in a linear path along the pipeline alignment. Thus, lane closures would only affect one specific area of the project's alignment for a short period of time. Anticipated construction-related vehicle trips include construction workers traveling to and from the project work areas, haul trucks (including for import and export of excavated materials, as needed), and other trucks associated with equipment and material deliveries. Because construction is a short-term activity, and impacts to existing roadways during pipeline construction would move as work progresses along the pipeline corridor, construction-related traffic impacts would not be substantial. Roadways would be restored to match the surrounding road type once construction is complete. Therefore, the proposed project would have a less than significant impact involving conflict with a

program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.

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 and states vehicle miles traveled (VMT) exceeding a specific threshold may indicate a significant impact. A VMT calculation is typically conducted on a daily or annual basis to determine operational usage of a project. In accordance with Section 15064.3(b)(3) of the *CEQA Guidelines*, a lead agency may include a qualitative analysis of operational and construction traffic. Casitas has not adopted VMT thresholds.

As discussed under Item 17(a), traffic on local roadways may be temporarily increased during project construction due to the presence of construction vehicles and equipment. Increases in VMT from construction would be short-term and temporary. Following the completion of construction activities, operation and maintenance activities would be infrequent and would not substantially contribute to VMT along project roadways. Therefore, because VMT from construction would be temporary and limited to the active construction period, and operation and maintenance activities would be negligible, no impact associated with VMT would occur and the proposed project would not conflict or be inconsistent with *CEQA Guidelines* Section 15064.3(b).

NO 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)?*

The proposed project would not introduce new roadway design features or land uses incompatible with the surrounding area. The project would not involve reconfiguration of any roadways or intersections resulting in a substantial increase in traffic hazards. Pipeline construction activities would require temporary lane closures; however, standard traffic controls would minimize the potential for construction-related traffic hazards. As such, the project would not substantially increase hazards due to a geometric design feature or incompatible use, and no impact would occur.

NO IMPACT

- d. *Would the project result in inadequate emergency access?*

Emergency access to the project site would be maintained throughout construction and operation. A segment of the Foothill Road pipeline alignment would require flagger-controlled traffic controls, and a minimum of one lane of traffic in each direction would be open during project construction. As discussed in Section 9, *Hazardous and Hazardous Materials*, Casitas would implement standard traffic controls to minimize impacts to the traveling public and potential emergency evacuation routes. Therefore, although temporary lane closures during project construction would be necessary, emergency access would be maintained at all times.

Project operation and maintenance would not introduce new activities or traffic with the potential to result in inadequate emergency access, and the proposed project would not increase demand for emergency services along the project alignment. The proposed project would have a less than significant impact regarding inadequate emergency access.

LESS-THAN-SIGNIFICANT IMPACT

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)?	☐	☐	☐	☒
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.	☐	☐	☐	☒

On July 1, 2015, Assembly Bill 52 (AB 52) was enacted, expanding CEQA by defining a new resource category, “tribal cultural resources” (PRC Section 21074). As noted in PRC Section 21084.2, “a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment.”. PRC Section 21084.3 further states the lead agency shall avoid damaging effects to tribal cultural resources and develop mitigation measures to avoid or minimize significant adverse impacts to tribal cultural resources, when feasible.

PRC Sections 21074 (a)(1)(A-B) and 21074(a)(2) define tribal cultural resources as “sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe” and are:

1. Listed or eligible for listing in the CRHR or in a local register of historical resources as defined in PRC 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 PRC Section 5024.1(c). In applying these criteria, the lead agency shall consider the significance of the resource to a California Native American tribe.

AB 52 also established a formal consultation process for California Native American tribes regarding tribal cultural resources. The consultation process must be completed before a CEQA document can be certified or adopted. 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 who have previously requested in writing to be notified of projects proposed in the jurisdiction of the lead agency and who request consultation on a project.

Casitas has not received written requests from California Native American tribes regarding notification of projects under AB 52. Therefore, no California Native American tribes required notification under AB 52, and AB 52 consultation was not conducted for the project.

- 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)?*
- b. *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 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?*

No tribal cultural resources listed or eligible for listing in the CRHR or in a local register of historical resources were identified within the project site. In addition, no tribal cultural resources within or near the project site have been identified and determined by Casitas (the lead agency) to be significant. Therefore, the project would not cause a substantial adverse change in the significance of a tribal cultural resource as defined in PRC Section 21074, which is listed or eligible for listing in the CRHR, or in a local register of historical resources as defined in PRC Section 5020.1(k) or is a resource determined by Casitas (the lead agency), in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in PRC Section 5024.1(c). No impact would occur.

NO IMPACT

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?*

Water

The proposed project involves the construction of new water infrastructure, the environmental effects of which are analyzed in this IS-MND. The project would not increase Casitas' capacity to serve additional customers. As concluded by this IS-MND, the water facilities included in the proposed project would not cause unmitigable significant environmental effects. Consequently, no additional impact related to water facilities would occur.

Wastewater

The project would not require permanent on-site personnel and does not include the installation of restroom facilities. Therefore, no wastewater would be generated, and the project would not result in the construction or relocation of additional new or expanded wastewater facilities. Thus, no impact related to wastewater treatment would occur.

Stormwater Drainage

As discussed in Environmental Checklist Section 10, *Hydrology and Water Quality*, the proposed pipelines would be constructed underground, and other proposed infrastructure would be located in developed areas. The proposed improvements would not increase the rate or amount of surface runoff so as to exceed the capacity of existing or planned drainage systems or provide additional sources of polluted runoff. The proposed project would not result in substantial new impervious surfaces. Therefore, no impact related to stormwater drainage would occur.

Electric Power

As discussed in Environmental Checklist Section 6, *Energy*, the proposed project would not increase energy demands associated with the existing water infrastructure as the improvements would not involve an expansion of design capacity. Therefore, no new or relocated energy facilities would be required as a result of the proposed project. No impact related to electric power would occur.

Natural Gas

The project would not involve any components requiring natural gas service and is not anticipated to involve the relocation of existing natural gas facilities. Therefore, no impact related to natural gas facilities would occur.

Telecommunications

The project would not involve any components requiring telecommunications infrastructure and is not anticipated to involve the relocation of existing telecommunications facilities. Therefore, no impact related to telecommunications facilities 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 proposed project consists of the construction and operation of potable water facilities. Project construction water requirements would be met via Casitas' existing supplies and facilities. The project would not increase overall water supply availability or result in increased water consumption. Therefore, no impact related to sufficiency of water supplies would occur.

NO 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?*

As discussed under Item 19(a), the project would not generate sanitary wastewater or otherwise contribute to an increase in wastewater treatment requirements. 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?*

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 located in Santa Paula, approximately 13 miles southeast of the project site. Toland Road Landfill accepts a variety of materials, including construction and demolition materials, agricultural waste, industrial waste, sludge (biosolids), and mixed municipal waste. 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 2,864 tons per day. As of December 2021, the remaining capacity at the landfill was approximately 7.6 million cubic yards. The landfill solid waste permit lists an estimated closure date of 2033 (CalRecycle 2025).

Construction activities may temporarily generate solid waste, such as from demolition of the existing Arbolada Tank and pump station, which would be disposed of in accordance with all applicable federal, State, and local statutes and regulations. 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. Therefore, the project would comply with federal, state, and local management and reduction statutes and regulations related to 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?	☐	☐	☐	☒

- 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?*

The Private Drive, Foothill Road, and Running Ridge sites are located in State Responsibility Areas designated as Very High Fire Hazard Severity Zones (CAL FIRE 2024). The Ojai East Tank site is located directly adjacent to a State Responsibility Area designated as a Very High Fire Hazard Severity Zone (CAL FIRE 2024).

The areas within Very High Fire Hazard Severity Zones (Private Drive, Foothill Road, and Running Ridge sites) are accessed via local roads including Foothill Road, Running Ridge Road, and a private driveway. These roads are not identified as primary or secondary evacuation routes in the Ventura County General Plan Safety Element or the City of Ojai Safety Element. Construction activities would be temporary and localized, and would not require full road closures. Traffic control measures (e.g., flaggers, signage) would be implemented as needed to maintain emergency access at all times.

During operation, the project would not introduce new structures or uses which could interfere with emergency response or evacuation.

As discussed in Environmental Checklist Section 9, *Hazards and Hazardous Materials*, and Environmental Checklist Section 17, *Transportation*, neither construction nor operation of the proposed project would impair or conflict with an adopted emergency response or evacuation plan and the project would not permanently result in inadequate access for emergency response vehicles. However, construction activities would require temporary lane closures which could impede emergency response or emergency evacuation, and impacts 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?*

As discussed under Item 20(a), portions of the project site are located within Very High Fire Hazard Severity Zones, indicating slope, winds, and fuel availability around the project site create a high potential for fire, absent any fuel modification efforts.

The proposed project would consist of water infrastructure improvements within paved roadways and developed sites; however, areas adjacent to the project site could be characterized as grass-covered land. Construction of the proposed project would include the use of heavy-duty equipment. In accordance with PRC Section 4442, equipment including earth-moving and portable construction equipment with internal combustion engines would be equipped with spark arrestors to prevent the emission of flammable debris from exhaust, when 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. These measures are designed to prevent accidental ignition and facilitate rapid response in the event of a fire.

The project would not introduce habitable structures, permanent ignition sources, or land use changes which could increase long-term wildfire risk. Operation and maintenance activities would be infrequent and similar to existing conditions. Additionally, the project would not expose workers or the public to elevated pollutant concentrations from wildfire smoke, as no sensitive receptors would be located on site.

Therefore, with adherence to applicable fire safety regulations, the project would not exacerbate wildfire risk due to slope, wind, or fuel conditions. Impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

- 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?*

- 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?*

Portions of the project site are located within Very High Fire Hazard Severity Zones (CAL FIRE 2024).

The project would not require the construction of new roads, fuel breaks, emergency water sources, power lines, or other utilities which could exacerbate fire risk. Upon completion of construction, the ground surface would generally be restored to pre-project conditions. Routine operation and maintenance activities would be limited in scope and would not introduce new ignition sources or exacerbate fire risk.

Construction would occur in relatively flat or gently sloping areas and would not disturb adjacent open space, steep hillsides, or natural drainage features. Additionally, as discussed in Environmental Checklist Section 10, *Hydrology and Water Quality*, the proposed project would not alter existing drainage patterns or increase stormwater runoff. BMPs would be implemented to control erosion and sedimentation during construction. As such, the project would not expose people or structures to significant downslope or downstream flooding or landslide risks resulting from runoff or drainage changes. 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?*

As discussed in Environmental Checklist Section 4, *Biological Resources*, the project would not 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, or substantially reduce the number or restrict the range of a rare or endangered plant or animal. In addition, as discussed in Environmental Checklist Section 5, *Cultural Resources*, the project would not eliminate important examples of the major periods of California history or prehistory. No impact would occur.

NO 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 (and potentially less than significant) project effects which, when considered together or in concert with other projects, combine to result in a significant impact within an identified geographic area. Cumulative development in the geographic area of the project site (defined as the Ojai Valley area) consists of pavement rehabilitation throughout the city of Ojai (City of Ojai 2025; County of Ventura 2024).

Project impacts are primarily temporary, localized effects that would occur during construction activities. As discussed throughout this IS-MND, the project would result in no impacts to agriculture and forestry resources, energy, land use and planning, mineral resources, population and housing, public services, recreation, and tribal cultural resources, and therefore the project would not contribute to cumulative impacts to these resources. The potential for the project to contribute to cumulative impacts would be limited to project construction and infrequent operation and maintenance activities, and the following specific issue areas, for which the project is anticipated to have less than significant impacts (with or without mitigation):

- **Aesthetics:** Cumulative development in the region would consist of roadway repaving and would have limited potential to change the existing visual landscape. Additionally, there are no cumulative projects in the vicinity of the project site. The project would result in a small change to the current visual character of the project site through the addition of new infrastructure but would be substantially similar to what is present at the site currently. Therefore, cumulative impacts related to aesthetics would not be significant.
- **Air Quality:** Because the Basin is designated as being in nonattainment for the ozone NAAQS and CAAQS and PM₁₀ CAAQS, significant cumulative air quality impacts currently exist for these pollutants. As discussed in Environmental Checklist Section 3, *Air Quality*, with implementation of Mitigation Measure AQ-1, the proposed project would not generate emissions of these air pollutants which exceed the VCAPCD significance thresholds, which are intended to assess whether a project’s contribution to existing cumulative air quality impacts is considerable. Therefore, the project’s contribution to significant cumulative air quality impacts would not be cumulatively considerable.
- **Biological Resources:** Cumulative development in the region have the potential to disturb areas with the potential to contain or provide habitat for biological resources. Discretionary cumulative development projects have undergone or would be required to undergo CEQA review, which would determine the extent of potential biological resources impacts and mitigate those impacts appropriately. If these cumulative projects would result in impacts to biological resources, impacts to such resources would be addressed on a case-by-case basis. However, cumulative impact to biological resources are potentially significant. The proposed project would be required to implement Mitigation Measures BIO-1 through ~~BIO-5~~ BIO-7, which would minimize impacts to special status species, aquatic habitat, and protected trees, such that the proposed project would not have a cumulatively considerable contribution to a potentially significant cumulative impact.
- **Cultural Resources:** As mentioned above, discretionary cumulative development projects have undergone or would be required to undergo CEQA review, which would determine the extent of potential cultural resources impacts. If cumulative projects would result in impacts to known or unknown cultural resources, impacts to such resources would be addressed on a case-by-case

basis. However, cumulative impact to cultural resources are potentially significant. The proposed project would be required to implement Mitigation Measure CUL-1, which would require unanticipated discovery protocols to protect cultural resources, such that the proposed project would not have a cumulatively considerable contribution to a potentially significant cumulative impact.

- **Geology and Soils:** Geologic impacts are typically site-specific and not cumulative in nature. However, cumulative development in the region have the potential to disturb areas that contain paleontological resources. As discussed above, discretionary cumulative development projects have undergone or would be required to undergo CEQA review, which would determine the extent of potential paleontological resources impacts and mitigate those impacts to the extent feasible. However, cumulative impact to paleontological resources are potentially significant. The proposed project would be required to implement Mitigation Measure GEO-1, which would require an unanticipated discovery protocol to protect paleontological resources, such that the proposed project would not have a cumulatively considerable contribution to a potentially significant cumulative impact.
- **Greenhouse Gas Emissions:** GHG emissions and climate change are, by definition, cumulative impacts. As discussed in Environmental Checklist Section 8, *Greenhouse Gas Emissions*, the adverse environmental impacts of cumulative GHG emissions, including increased average temperatures, more drought years, and more frequent large wildfires, are already occurring. As a result, cumulative impacts related to GHG emissions are significant. Thus, the issue of climate change involves an analysis of whether a project's contribution towards an impact is cumulatively considerable. As discussed in Environmental Checklist Section 8, *Greenhouse Gas Emissions*, project emissions during construction would be short-term in nature, and operational emissions would be the same as existing conditions. Furthermore, project emissions would be consistent with adopted plans which reduce climate change, and would therefore not be cumulatively considerable.
- **Hazards and Hazardous Materials:** Similar to the proposed project, cumulative projects would be required to comply with regulations applicable to the use, disposal, and transportation of hazardous materials during construction activities, and compliance with applicable regulations would reduce potential cumulative impacts to less-than-significant levels. With respect to the use and accidental release of hazardous materials in the environment during construction, effects are generally limited to site-specific conditions. Therefore, cumulative impacts related to accidental release of hazardous materials would not be significant.
- **Hydrology and Water Quality:** San Antonio Creek is listed by the Los Angeles RWQCB on the 303(d) list of impaired water bodies for nitrogen, total dissolved solids, dissolved oxygen, and other pollutants (SWRCB 2024a); thus, a cumulative impact to water quality occurs under existing conditions. The proposed project would be required to comply with existing NPDES regulations to ensure it does not result in substantial erosion or stormwater discharges that would substantially affect water quality in San Antonio Creek. Implementation of these regulations minimizes the potential for significant impacts to occur. Furthermore, the proposed project would implement Mitigation Measure ~~BIO-4~~ BIO-6, which would require construction BMPs which would reduce the potential for adverse water quality impacts to San Antonio Creek. Therefore, the proposed project would not have a considerable contribution to this cumulative impact.

- **Noise:** Cumulative development may occur at the same time as the proposed project; however, there are no cumulative projects in the vicinity of the project site which could result in an increase in noise, should construction schedules overlap. Therefore, cumulative impacts related to noise would not be significant.
- **Transportation:** Cumulative development may occur at the same time as the proposed project. However, the cumulative development projects and the proposed project would not increase traffic levels or require closures of the same roadways; therefore no significant cumulative transportation impacts would occur.
- **Utilities and Service Systems:** Cumulative development, including the proposed project, would involve the installation of new utility infrastructure. However, other cumulative development consists of roadway repaving and would not increase demand for utilities such that new or expanded utility infrastructure would be required. Therefore, cumulative impacts related to utilities and service systems would not be significant.
- **Wildfire:** All cumulative development would be required to comply with PRC Section 4442 and Section 4428, which would minimize potential fire risk. Additionally, cumulative development (roadway repaving) would occur within paved roadways and would have limited potential to ignite wildfires during construction. Therefore, cumulative impacts related to wildfire would not be significant.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

- 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, noise, and wildfire impacts. As detailed in Environmental Checklist Section 3, *Air Quality*, the project would not result, either directly or indirectly, in substantial adverse effects related to air quality through construction or operation with implementation of Mitigation Measure AQ-1. As discussed in Environmental Checklist Section 9, *Hazards and Hazardous Materials*, project operation would not involve the routine use of large quantities of hazardous materials. Compliance with applicable regulations during project construction would ensure potential impacts on human beings related to hazards and hazardous materials would be less than significant. During project construction, implementation of Mitigation Measure NOI-1 would ensure construction activities would not generate excessive vibration and substantially impact nearby residential land uses. Construction noise would be temporary and the project would have a less than significant impact related to temporary increases in ambient noise levels in excess of local noise standards. Project operation would not generate noise or substantially increase noise levels. Impacts involving noise would be less than significant with mitigation incorporated. As discussed in Environmental Checklist Section 20, *Wildfire*, the project's impacts involving wildfire would be less than significant, as project construction would comply with applicable regulations minimizing fire risk.

Therefore, the project would have environmental effects that would have the potential to cause substantial adverse effects on human beings, either directly or indirectly; however, these impacts would be reduced less than significant with mitigation.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

Federal Cross-Cutting Environmental Regulations Evaluation

Casitas is seeking funding under a state program with a federal funding component. As such, this IS-MND includes analysis to support compliance with applicable federal environmental requirements, commonly referred to as federal cross-cutters. The requirements for compliance with these federal authorities are outlined in the Drinking Water Environmental Package Instructions (Construction – Tier I) (SWRCB 2024b). This section summarizes the project’s status with respect to relevant federal laws, executive orders, and policies, and identifies any consultation conducted or anticipated.

The topics addressed are based in part on the State Water Resources Control Board’s (SWRCB) Federal Cross-Cutting Environmental Regulations Evaluation Form, which is used to document compliance for projects funded through the State Revolving Fund (SRF) Program, partially supported by the U.S. Environmental Protection Agency (USEPA).

The project must demonstrate consistency with the following federal cross-cutters:

- Federal Endangered Species Act (FESA; Section 7)
- National Historic Preservation Act (NHPA; Section 106)
- General Conformity Rule for the Federal Clean Air Act (FCAA)
- Clean Air Act
- Coastal Zone Management Act
- Farmland Protection Policy Act
- Executive Order 11988 – Floodplain Management
- Federal Migratory Bird Treaty Act, Bald and Golden Eagle Protection Act, and Executive Order 13168
- Executive Order 11990 – Protection of Wetlands
- Wild and Scenic Rivers Act
- Safe Drinking Water Act – Source Water Protection
- Executive Order on Trails for America in the 21st Century
- Executive Order 13007 – Indian Sacred Sites
- Magnuson-Stevens Fishery Conservation and Management Act
- Executive Order 12898 – Environmental Justice

Federal Endangered Species Act

Section 7 of the FESA requires federal agencies, in consultation with the Secretary of the Interior, to ensure their actions do not jeopardize the continued existence of endangered or threatened species or result in the destruction or adverse modification of the critical habitat of these species. Under Section 7, a project that could result in incidental take of a listed threatened or endangered species must consult with the United States Fish and Wildlife Service to obtain a Biological Opinion. If the Biological Opinion finds the project could jeopardize the existence of a listed species (“jeopardy opinion”), the agency cannot authorize the project until it is modified to obtain a “non-jeopardy” opinion.

According to the Biological Resources Assessment (Appendix B), based on the plant communities present, prior development, existing disturbances, and isolation of the project site from native, natural habitat, the project site does not support federally endangered wildlife species. The Biological Resources Assessment determined the proposed project would have no effect on federal special status species under federal regulations. The project would be in compliance with the FESA.

National Historic Preservation Act, Section 106

The purpose of the NHPA is to protect, preserve, rehabilitate, or restore significant historical, archaeological, and cultural resources. Section 106 requires federal agencies to take into account effects on historic properties. Section 106 review involves a step-by-step procedure described in detail in the implementing regulations (36 Code of Federal Regulations [CFR] Part 800). The HPIR prepared for the project includes a Section 106 evaluation for the project and can be submitted by SWRCB as part of the consultation process with the State Historic Preservation Officer (SHPO). Concurrence by the SHPO would ensure compliance with the NHPA.

The HPIR determined neither the OWS system nor any of the historic age components of the OWS in the APE are eligible for listing in the National Register of Historic Places or the California Register of Historical Resources. Additionally, the NHPA defines a historic property as “any prehistoric or historic district, site, building, structure, or object included on, or eligible for inclusion on, the NRHP, including artifacts, records, and material remains relating to the district, site building, structure, or object” (NHPA 300308). There are no historic properties located within the APE for the purposes of Section 106 of the NHPA. Based on the results of HPIR, Rincon recommends a finding of no effect to historic properties under Section 106 of NHPA for the proposed undertaking.

Clean Air Act

The 1990 Amendment to Federal Clean Air Act (FCAA) Section 176 requires USEPA to promulgate rules to ensure federal actions conform to the appropriate State Implementation Plan (SIP). These rules, known as the General Conformity Rule (40 CFR Parts 51.850–51.860 and 93.150–93.160), require any federal agency responsible for an action in a federal nonattainment/maintenance area to demonstrate conformity to the applicable SIP, by either determining the action is exempt from the General Conformity Rule requirements or subject to a formal conformity determination. Actions would be exempt, and thus conform to the SIP, if an applicability analysis shows the total direct and indirect emissions of nonattainment/maintenance pollutants from project construction and operation activities would be less than specified emission rate thresholds, known as *de minimis* levels. If not determined exempt, an air quality conformity analysis would be required to determine conformity.

The proposed project site is located within the South Central Coast Air Basin, which is a federal nonattainment area for 8-hour ozone. Therefore, the General Conformity Rule is applicable to the project emissions of ozone precursors (ROC and NO_x). Table 9 lists the total annual emissions potentially generated during construction of the proposed project, as well as the maximum worst-case scenario (which assumes all project components are constructed simultaneously) and compares these emissions to the applicable *de minimis* emission rates for the South Central Coast Air Basin region.

Table 9 Proposed Project Total Annual Construction Emissions

	Estimated Annual Construction Emissions (tons/year)					
	ROC	NO _x	CO	PM ₁₀	PM _{2.5}	SO ₂
Foothill Road Pipeline	<0.1	0.19	0.27	<0.1	<0.1	<0.1
Private Drive Pipeline	<0.1	<0.1	0.12	<0.1	<0.1	<0.1
Arbolada Tank Demolition	<0.1	0.45	0.67	<0.1	<0.1	<0.1
Running Ridge Tank Abandonment	0.12	1.07	1.35	0.11	<0.1	<0.1
Ojai East Tank Rehabilitation and Construction	0.12	0.47	0.62	<0.1	<0.1	<0.1
OWS Water System Wellfield Chloramine Conversion	<0.1	0.61	0.98	<0.1	<0.1	<0.1
Maximum Worst-Case Scenario	0.24	2.79	4.01	0.11	<0.1	<0.1
De Minimis Thresholds	50	50	n/a	n/a	n/a	n/a
Threshold Exceeded?	No	No	No	No	No	No

ROG: reactive organic gases; NO_x: nitrogen oxides; CO: carbon monoxide; PM₁₀: particulate matter 10 microns or less in diameter; PM_{2.5}: particulate matter 2.5 microns or less in diameter; SO₂: sulfur dioxide
 See Appendix A for full modeling details.

As shown in Table 9, the project's criteria air pollutant emissions would not exceed the applicable *de minimis* rates. Therefore, the general conformity requirements do not apply to the project, and a formal conformity determination is not applicable to the project. Accordingly, the lead agency would be in compliance with the FCAA.

Coastal Zone Management Act

The Coastal Zone Management Act (CZMA), passed by Congress in 1972 and managed by the National Oceanic and Atmospheric Administration's Office of Ocean and Coastal Resource Management, is designed to balance competing land and water issues in coastal zones. It also aims to "preserve, protect, develop, and where possible, to restore or enhance the resources of the nation's coastal zone." Within California, the CZMA is administered by the Bay Conservation and Development Commission, the California Coastal Conservancy, and the California Coastal Commission.

No portion of the project is within the coastal zone (California Coastal Commission 2019). The coastal zone extends inland from the Pacific Ocean and varies between several hundred feet to five miles from the coastline. The project site is approximately 12 miles northeast of the Pacific Ocean. Therefore, the CZMA does not apply to the project.

Farmland Protection Policy Act

The Farmland Protection Policy Act (FPPA) requires a federal agency consider the effects of its actions and programs on the nation's farmlands. The FPPA is intended to minimize the impact of federal programs with respect to the conversion of farmland to nonagricultural uses. It assures, to the extent possible, federal programs are administered to be compatible with state, local, and private programs and policies to protect farmland.

The project site is not currently in agricultural production and does not contain Prime Farmland, Unique Farmland, Farmland of Statewide Importance, or land with a Williamson Act contract (California Department of Conservation 2022). Therefore, the project would not adversely affect any farmland areas and the project would be in compliance with the FPPA.

Executive Order 11988 – Floodplain Management

Executive Order (EO) 11988 requires federal agencies to recognize the values of floodplains, consider the public benefits from restoring and preserving floodplains, and evaluate the potential effects of any actions taken within a floodplain.

Most of the proposed project components are located outside of designated flood hazard areas. However:

- The OWS Wellfield site is located within Federal Emergency Management Agency (FEMA) Flood Zone AE, which is defined as an area subject to inundation by the 1-percent annual chance (100-year) flood.
- The Ojai East Tank site is located within both FEMA Zone AE and Zone B, the latter of which is subject to inundation by the 0.2-percent annual chance (500-year) flood (FEMA 2014, 2021).

The proposed improvements at these sites—including treatment system upgrades and a new water storage tank—would occur within previously developed areas which currently support water infrastructure. The project would not involve new encroachments into undeveloped floodplain areas, nor would it alter topography or introduce features which could impede or redirect flood flows.

Additionally, the project would not increase flood risk to people or structures, nor would it interfere with local or federal floodplain management practices. Therefore, the project is consistent with the intent and requirements of this EO.

Federal Migratory Bird Treaty Act, Bald and Golden Eagle Protection Act, and Executive Order 13168

The Migratory Bird Treaty Act and the Bald and Golden Eagle Protection Act prohibit the take of migratory birds (or any part, nest, or eggs of any such bird) and the take and commerce of eagles. EO 13168 requires any project with federal involvement to address impacts of federal actions on migratory birds. As described in the Biological Resources Assessment (Appendix B), Casitas would implement nesting bird avoidance measures and pre-construction surveys through ~~BIO-2~~ BIO-4 and ~~BIO-3~~ BIO-5 to comply with the Migratory Bird Treaty Act and the California Fish and Game Code. These measures are designed to avoid take of species protected under the Migratory Bird Treaty Act. With implementation of these measures, the project would be in compliance with these federal regulations.

Executive Order 11990 – Protection of Wetlands

Under EO 11990, federal agencies must avoid affecting wetlands unless it is determined no practicable alternative is available. As described in the Biological Resources Assessment (Appendix B), the project site would not affect federally-protected wetlands as defined by CWA Section 404, and therefore no impacts would occur. Thus, the project would be in compliance with EO 11990.

Wild and Scenic Rivers Act

The Wild and Scenic Rivers Act was passed in 1968 to preserve and protect designated rivers for their natural, cultural, and recreational value. There are no designated Wild and Scenic Rivers within the project area (National Wild and Scenic Rivers System 2025), nor will any designated rivers be adversely affected by the project. As a result, the Wild and Scenic Rivers Act does not apply to the project.

Safe Drinking Water Act – Source Water Protection

Section 1424(e) of the Safe Drinking Water Act established the USEPA's Sole Source Aquifer Program. This program protects communities from groundwater contamination from federally-funded projects. Within USEPA's Region 9, which includes California, there are nine sole source aquifers. None of these sole source aquifers are located within the project area (USEPA 2025). Therefore, the Sole Source Aquifer Program does not apply to the project, and the project would be in compliance with Section 1424(e) of the Safe Drinking Water Act.

Executive Order on Trails for America in the 21st Century

The EO on Trails for America requires federal agencies to protect, connect, promote, and assist trails of all types throughout the United States. No trails exist on the project site, and project implementation would not affect trails. Therefore, no adverse effects on trails would occur, and the project is in compliance with this EO.

Executive Order 13007 – Indian Sacred Sites

Sacred sites are defined in EO 13007 as "any specific, discrete, narrowly delineated location on federal land identified by an Indian tribe, or Indian individual determined to be an appropriately authoritative representative of an Indian religion, as sacred by virtue of its established religious significance to, or ceremonial use by, an Indian religion; provided the tribe or appropriately authoritative representative of an Indian religion has informed the agency of the existence of such a site." The project would not be located on or impact any federal lands and therefore would not affect any Native American sacred sites under this EO.

Magnuson-Stevens Fishery Conservation and Management Act

The Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act) of 1976 as amended (16 U.S.C. § 1801 et seq.), is the primary act governing federal management of fisheries in federal waters, from the 3-nautical-mile state territorial sea limit to the outer limit of the U.S. Exclusive Economic Zone. It establishes exclusive U.S. management authority over all fishing within the Exclusive Economic Zone, all anadromous fish throughout their migratory range except when in a foreign nation's waters, and all fish on the continental shelf. The Act also requires federal agencies to consult with NMFS on actions which could damage Essential Fish Habitat (EFH), as defined in the 1996 Sustainable Fisheries Act (Public Law 104-297).

The project would not be located in or impact any U.S. federal waters regulated under the Magnuson-Stevens Act, and the project would be in compliance with the Magnuson-Stevens Act.

Executive Order 12898 - Environmental Justice

Consistent with the federal cross-cutter requirements, this section describes the existing socioeconomic resources in the project area and the regulatory setting pertaining to environmental justice-related issues. USEPA guidelines recommend the analyses of low-income communities consider the United States Census poverty level definitions, as well as applicable State and regional definitions of low-income and poverty communities. According to United States Census estimates, approximately 11 percent of Ojai residents are at or below the poverty level. In comparison, the percentage of persons in poverty in the entire state of California is 12 percent (United States Census Bureau 2023a, 2023b). Therefore, the affected area has a poverty rate below the State average.

A Disadvantaged Community (DAC) is defined as a community with a median household income (MHI) less than 80 percent of the California MHI (Public Resource Code Section 75005[g]). According to United States Census data, the statewide MHI was \$95,521 in 2023. A DAC would therefore be defined as a community with a MHI of \$76,417 or less. According to the SWRCB's SAFER Dashboard, the MHI of the OWS is \$75,499 (SWRCB 2025b). Therefore, the project area would be considered a DAC. The proposed project would address insufficient storage capacity in the OWS and provide compatible water treatment to both the OWS and Casitas system. Thus, the proposed project would result in an overall benefit to the OWS community, and no adverse environmental justice impacts would occur.

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List of Preparers

Rincon Consultants, Inc. prepared this IS-MND under contract to Casitas Municipal Water District. Persons involved in data gathering analysis, project management, and quality control are listed below.

Rincon Consultants, Inc.

Jennifer Haddow, PhD, Principal-in-Charge
Nicole West, Senior Supervising Environmental Planner
Amanda Antonelli, Senior Environmental Planner and Project Manager
Bill Vosti, Supervising Environmental Planner/Technical Specialist
Nicholas Carter, Environmental Planner
Ethan Knox, Environmental Planner
Andrew McGrath, Paleontologist
Luis Apolinar, Publishing Specialist

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2 Responses to Comments on the Draft IS-MND

This section includes comments received during public circulation of the Draft Initial Study-Mitigated Negative Declaration (IS-MND) prepared for the Casitas-Ojai Water System Consolidation Project (project).

The Draft IS-MND was circulated for a 30-day public review period which began on July 18, 2025 and ended on August 18, 2025. Casitas Municipal Water District (Casitas) received six comment letters on the Draft IS-MND. The commenters and the page number on which each commenter's letter appear are listed below.

Letter No. and Commenter		Page No.
1	Miya Edmonson, California Department of Transportation	2-2
2	Shari Herbruck, City of Ojai	2-6
3	Lori Schmitz, State Water Resources Control Board	2-8
4	Christopher Solis, Ventura County Public Works – Roads & Transportation	2-13
5	Yunsheng Su, Ventura County Public Works Watershed Protection, Watershed Planning and Permits Division	2-15
6	Heather Pert, California Department of Fish and Wildlife	2-21

The comment letters and responses follow. The comment letters are 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 Comment Letter 1).

DEPARTMENT OF TRANSPORTATION

DISTRICT 7

100 S. MAIN STREET, MS 16

LOS ANGELES, CA 90012

PHONE (213) 269-1124

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www.dot.ca.gov



*Making Conservation
a California Way of Life*

August 11, 2025

Julia Aranda, Engineering Manager
Casitas Municipal Water District
1055 Ventura Avenue
Oak View, CA 93022

RE: Casitas-Ojai Water System
Consolidation Project
SCH # 2025070808
Vic. VEN-150/PM 19.95 to 16.78
VEN-33/PM 12.78
GTS # VEN-2025-00648-MND

Dear Julia Aranda:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced environmental document. The Casitas Municipal Water District, CMWD, project to integrate the Ojai and Casitas water systems involves pipeline installation, tank demolition and construction, tank rehabilitation, water treatment system upgrades, and pump station replacement in Ojai and unincorporated Ventura County.

1.1

The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. Senate Bill 743 (2013) has codified into CEQA law and mandated that CEQA review of transportation impacts of proposed development be modified by using Vehicle Miles Traveled (VMT) as the primary metric in identifying transportation impacts for all future development projects. As a reminder, all environmental documents should include Vehicle Miles Traveled. You may reference the Governor's Office of Planning and Research (OPR) for more information:

1.2

<https://opr.ca.gov/ceqa/#guidelines-updates>

The project's construction would cause only short-term, temporary increases in vehicle miles traveled (VMT), with infrequent operations afterward. Since Casitas has no adopted VMT thresholds and operational VMT impacts would be negligible, the project would not result in a significant VMT impact or conflict with CEQA requirements.

1.3

Please be reminded that any work performed within the State Right-of-way, if any, will require an Encroachment Permit from Caltrans. Any modifications to State facilities must meet all mandatory design standard and specifications.

1.4

Any transportation of heavy construction equipment and/or materials that require the use of oversized transport vehicles on State highways will need a Caltrans transportation permit. Any large-size truck trips be limited to off-peak commute periods for the construction phase and operation phase. Construction truck loads should be covered with a tarpaulin cover.

1.5

Storm water run-off is a sensitive issue for Los Angeles County. Please be mindful that projects should be designed to discharge clean run-off water. Additionally, discharge of storm water run-off is not permitted onto State highway facilities without any storm water management plan.

1.6

If you have any questions, please feel free to contact Mr. Alan Lin, the project coordinator, at (213) 269-1124 and refer to GTS # VEN-2025-00648-MND.

Sincerely,

Miya Edmonson

MIYA EDMONSON
LDR/CEQA Branch Chief

email: State Clearinghouse

Letter 1

COMMENTER: Miya Edmonson, California Department of Transportation (Caltrans)

DATE: August 11, 2025

Response 1.1

The commenter expresses appreciation for their inclusion in the environmental review process, and provides a summary of the proposed project. This comment does not warrant changes to the Draft IS-MND.

Response 1.2

The commenter reminds the lead agency of Senate Bill 743 (2013), which requires the use of vehicle miles traveled (VMT) as the primary metric for evaluating transportation impacts under the California Environmental Quality Act (CEQA). As discussed in Environmental Checklist Section 17, *Transportation*, of the Draft IS-MND, the project would result in short-term, temporary increases in VMT during construction, with negligible operational VMT impacts. Casitas has not adopted VMT thresholds, and the project would not result in a significant VMT impact. This comment does not warrant changes to the Draft IS-MND.

Response 1.3

The commenter confirms the project's construction would cause temporary increases in VMT. As described in the Draft IS-MND, operational VMT impacts would be negligible, and no significant transportation impacts are anticipated. This comment does not warrant changes to the Draft IS-MND.

Response 1.4

The commenter reminds Casitas any work within the State right-of-way would require an Encroachment Permit from Caltrans and any modifications to State facilities must comply with applicable design standards. Should any portion of the project encroach into the State right-of-way, Casitas would obtain all necessary permits, including an Encroachment Permit from Caltrans, prior to construction. The proposed project would not include modifications to State facilities. This comment does not warrant changes to the Draft IS-MND.

Response 1.5

The commenter notes transportation of heavy equipment and materials using oversized vehicles on State highways would require a Caltrans transportation permit and recommends limiting large truck trips to off-peak periods and covering loads. Casitas would comply with all applicable regulations, including obtaining necessary transportation permits and implementing best practices for construction vehicle operations. This comment does not warrant changes to the Draft IS-MND.

Response 1.6

The commenter states stormwater runoff is a sensitive issue in Los Angeles County. The project site is located in Ventura County and, as discussed in Environmental Checklist Section 10, *Hydrology and Water Quality*, and Environmental Checklist Section 19, *Utilities and Service Systems*, of the Draft IS-

MND, the project would not create substantial new impervious surfaces or exceed drainage system capacity. Additionally, the proposed project would include preparation and implementation of a Storm Water Pollution Prevention Plan, which would minimize the amount of sediment and other pollutants associated with the construction site discharged in stormwater runoff. Furthermore, the project would include implementation of Mitigation Measure BIO-4, which requires best management practices to prevent runoff and protect water quality near San Antonio Creek, such as spill containment, sediment barriers, and setbacks for material storage and equipment maintenance. The project would not involve the discharge of stormwater runoff onto State highway facilities. This comment does not warrant changes to the Draft IS-MND.

On Fri, Aug 8, 2025 at 4:03 PM Shari Herbruck <shari.herbruck@ojai.ca.gov> wrote:

Good afternoon Julia,

Thank you for the opportunity to ask questions and comment on the Notice of Intent (NOI) to adopt a mitigated negative declaration for the *"Casitas Ojai System Consolidation Project."*

Questions:

2.1

1. What is the estimated time the project will last?
2. What are the potential noise impacts of the project?
3. The City of Ojai does not permit weekend work. Is work on the weekends proposed?

Sincerely, Shari

~~~~~

*Shari Herbruck, Principal Planning & Building Technician, City of Ojai*

(805) 646-5581 x112 - email: [shari.herbruck@ojai.ca.gov](mailto:shari.herbruck@ojai.ca.gov)

*Hours, 8a-5p – Mon-Fri*

## Letter 2

**COMMENTER:** Shari Herbruck, City of Ojai

**DATE:** August 8, 2025

### **Response 2.1**

The commenter inquires about the project’s timeline, potential noise impacts, and potential for weekend work. Table 2 on Page 11 of the Draft IS-MND identifies the estimated timelines for each component. Environmental Checklist Section 13, *Noise*, of the Draft IS-MND describes the potential noise impacts of the project. Initial Study Section 6, *Description of Project*, on page 8 of the Draft IS-MND states: “Construction would mostly be limited to between 8:00 am and 4:30 pm, Monday through Friday.” No weekend work is proposed. Casitas provided the above responses via email to the commenter. This comment does not warrant changes to the Draft IS-MND.



GAVIN NEWSOM  
GOVERNOR



YANA GARCIA  
SECRETARY FOR  
ENVIRONMENTAL PROTECTION

## State Water Resources Control Board

Ms. Aranda  
Casitas Municipal Water District  
1055 Ventura Avenue  
Oak View, CA 93022

Dear Ms. Aranda:

INITIAL STUDY / MITIGATED NEGATIVE DECLARATION (IS/MND) FOR THE CASITAS MUNICIPAL WATER DISTRICT (WATER SYSTEM); CASITAS-OJAI WATER SYSTEM CONSOLIDATION PROJECT (PROJECT); VENTURA COUNTY; STATE CLEARINGHOUSE NO. 2025070808

### DOMESTIC WATER SUPPLY PERMIT AMENDMENT

Thank you for the opportunity to review the IS/MND for the proposed Project. The State Water Resources Control Board, Division of Drinking Water (State Water Board, DDW) is responsible for issuing water supply permits pursuant to the Safe Drinking Water Act. This Project is within the jurisdiction of DDW Santa Barbara District. DDW Santa Barbara District issues domestic water supply permit amendments to the public water systems serviced with a new or modified source of domestic water supply or new domestic water system components pursuant to Waterworks Standards (Title 22 California Code of Regulations [Cal. Code Regs.] chapter 16 et. seq.). A public water system requires a new water supply permit if it includes the creation of a new public water system or a water supply permit amendment when changes are made to a domestic water supply source, storage, or treatment and for the operation of new water system components- as specified in the Cal. Code Regs. § 64556.

3.1

### FUNDING

We understand that the Water System is also pursuing Drinking Water State Revolving Fund (DWSRF) financing for this Project (DWSRF No. 5610024-002C). As a funding agency and a state agency with jurisdiction by law to preserve, enhance, and restore the quality of California's water resources, the State Water Board is providing the following water quality related comments on the IS/MND circulating for the Project.

3.2

The State Water Board, Division of Financial Assistance, is responsible for administering the DWSRF Program (Program). The primary purpose for the Program is to implement the Safe Drinking Water Act and various state laws by providing financial assistance for drinking facilities improvements to provide clean potable drinking water, and thereby protect and promote health, safety and welfare of the inhabitants of the state.

E. JOAQUIN ESQUIVEL, CHAIR | ERIC OPPENHEIMER, EXECUTIVE DIRECTOR

All applicants seeking DWSRF funding must comply with the California Environmental Quality Act (CEQA) and provide appropriate documents to the State Water Board so that it can fulfill its CEQA responsibilities, see [CEQA Requirements](#). For additional Program information, the complete environmental application package and instructions, please visit:

[Drinking Water State Revolving Fund Forms and Instructions](#).

3.2  
(cont.)

Following are specific comments on the Water System's draft IS/MND:

- The Water System will need to apply for a water supply permit amendment from the Division of Drinking Water Santa Barbara District office for operation of a new storage reservoir, operation of new treatment, and new system expansion. (Please note that temporary tanks will also need review from the Santa Barbara District.) Under Section 8 (PDF page 15) when discussing project permits, please add a domestic water supply permit amendment.
- Documents submitted to the State Water Board during the funding application process (e.g. bid schedule and designs), include project elements that are not reflected in the IS/MND. As part of Section 4 Project Location and Section 6 Project Description please include and/or discuss, as applicable:
  - How the Casitas and Ojai water system are currently connected and the future piping that will be installed to directly connect the two systems [Bid Schedule, PDF page 23, Designs C-104, C-501]. If piping will be installed in Fairview Road, please also add Fairview Road to the maps and list of project locations.
  - The destruction of the Valley View booster pump station [Bid Schedule, PDF page 25]. Please also provide a map of the Valley View booster pump station location and correct the associated location in the Project location description (PDF page 253) [Designs C-106].
  - The construction and operation of the new chemical feed system at the Arbolada Reservoir- including operational storage and delivery of new chemicals to the site [Bid Schedule, PDF page 24]. Also discuss the operation of the new treatment system at the wellfield site (PDF page 255).
  - If a temporary tank is required, while the existing tanks are being replaced or rehabilitated.
  - Which wells will continue to be used by the Water System. If some wells will not be integrated into the Water System, discuss how will they be managed or destroyed to protect water quality.

3.3

3.4

If an application for funding will be submitted, please upload to Financial Assistance Application Submittal Tool the following applicable documents for the proposed Project: (1) one copy of the draft and final IS/MND with the Mitigation Monitoring and Reporting Program (MMRP), (2) the resolution adopting the IS/MND and the MMRP, (3) all comments received during the review period and the Water System response to those comments, and (4) the Notice of Determination filed with the Ventura County Clerk and the Governor's Office of Land Use and Climate Innovation, State Clearinghouse. In

3.5

addition, we would appreciate notices of any hearings or meetings held regarding environmental review of any projects to be funded by the State Water Board.

3.5

If funding will not be pursued, please forward the above requested documents with your permit amendment application to the State Water Board, DDW Santa Barbara District Office at [DWPDIST06@waterboards.ca.gov](mailto:DWPDIST06@waterboards.ca.gov)

3.6

Thank you for the opportunity to review the Water System's draft IS/MND. If you have any questions or concerns, please feel free to contact me at (916) 449-5285, or by email at [Lori.Schmitz@waterboards.ca.gov](mailto:Lori.Schmitz@waterboards.ca.gov) or contact Mrs. Bridget Binning at (916) 449-5641, or by email at [Bridget.Binning@waterboards.ca.gov](mailto:Bridget.Binning@waterboards.ca.gov).

3.7

Sincerely,

 Digitally signed by Lori Schmitz  
Date: 2025.08.19 11:41:38 -0700  
Water Boards

Lori Schmitz  
Environmental Scientist  
Division of Financial Assistance  
Special Project Review Unit  
1001 I Street, 16<sup>th</sup> floor  
Sacramento, CA 95814

cc: State Clearinghouse

Bridget Binning, Division of Financial Assistance

Jason Cunningham, Division of Drinking Water

Armin Ghavim, Division of Drinking Water

## Letter 3

**COMMENTER:** Lori Schmitz, State Water Resources Control Board (SWRCB)

**DATE:** August 19, 2025

### Response 3.1

The commenter notes the SWRCB Division of Drinking Water is responsible for issuing water supply permits pursuant to the Safe Drinking Water Act and the proposed project is within the jurisdiction of the Division of Drinking Water Santa Barbara District. The commenter explains a domestic water supply permit amendment is required for public water systems which include a new or modified source of domestic water supply or new system components, in accordance with Title 22 of the California Code of Regulations. This comment does not warrant changes to the Draft IS-MND.

### Response 3.2

The commenter recognizes Casitas is pursuing Drinking Water State Revolving Fund financing and provides links to resources pertaining to CEQA requirements and environmental application package instructions. As described in the Draft IS-MND, Casitas has prepared the necessary environmental documentation to support CEQA compliance and Drinking Water State Revolving Fund eligibility. The Draft IS-MND includes a detailed evaluation of federal environmental requirements in Section *Federal Cross-Cutting Environmental Regulations Evaluation* on page 95, and addresses water quality impacts and permitting requirements in Environmental Checklist Section 10, *Hydrology and Water Quality*. These analyses demonstrate consistency with applicable state and federal regulations. This comment does not warrant changes to the Draft IS-MND.

### Response 3.3

The commenter notes the project would require a domestic water supply permit amendment from the Division of Drinking Water, Santa Barbara District, for operation of the new storage reservoir, new treatment system, and system expansion. Accordingly, Initial Study Section 8, *Other Public Agencies Whose Approval is Required*, of the Draft IS-MND has been revised to include the following addition in underline:

The proposed project may require the following permits:

- City of Ojai Encroachment Permit
- County of Ventura Transportation Department Encroachment Permit
- General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities
- National Pollutant Discharge Elimination System Permit No. CAG994004 – Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties
- State Water Resources Control Board, Division of Drinking Water, Domestic Water Supply Permit Amendment

### **Response 3.4**

The commenter notes several project elements included in the SWRCB funding application materials are not reflected in the Draft IS-MND, and requests specific details regarding listed project components.

The funding application materials include previous, outdated information from prior design phases. Some project elements have since been modified or eliminated. The project description within Initial Study Section 6, *Description of Project*, of the Draft IS-MND reflects the most recent description of the project, which is also described in the funding application package.

Casitas offers the following responses to bulleted information requests:

- The Casitas and Ojai water systems are currently connected via an intertie pipeline, and no future piping would be installed to directly connect the two systems.
- Figures 1 and 2 of the Draft IS-MND have been revised to reference the location of the Valley View Booster Pump Station. Initial Study Section 6, *Description of Project*, has been revised to clearly indicate the Valley View Booster Pump Station would be demolished.
- No chemical treatment would occur at the Arbolada site. The proposed new treatment system at the OWS Wellfield would be operated to meet water quality standards.
- No temporary tanks would be required.
- All wells currently used by the Ojai water system would continue to be used and integrated into the Casitas system.

### **Response 3.5**

The commenter requests key environmental documents be uploaded to the SWRCB's Financial Assistance Application Submittal Tool if an application for funding is submitted.

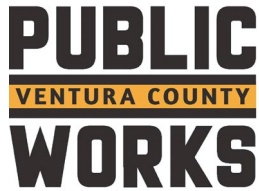
If the project is approved by the Casitas Board of Directors, Casitas will provide the following materials as part of the funding application process: (1) one copy of the Draft and Final IS-MND, including the Mitigation Monitoring and Reporting Program; (2) the resolution adopting the IS-MND and Mitigation Monitoring and Reporting Program; (3) all public comments received during the review period and Casitas' responses to those comments; and (4) the Notice of Determination filed with the Ventura County Clerk and the Governor's Office of Land Use and Climate Innovation, State Clearinghouse. Casitas will also provide notice of any hearings or meetings held regarding environmental review for projects to be funded by the SWRCB. This comment does not warrant changes to the Draft IS-MND.

### **Response 3.6**

In the event funding is not pursued, the commenter requests key environmental documents be submitted with the permit amendment application to the SWRCB Division of Drinking Water, Santa Barbara District Office. This comment does not warrant changes to the Draft IS-MND.

### **Response 3.7**

The commenter thanks Casitas for the opportunity to review the proposed project and provides contact information should Casitas have any questions for them. This comment does not warrant changes to the Draft IS-MND.



**COUNTY OF VENTURA  
PUBLIC WORKS AGENCY**

**MEMORANDUM**

**DATE:** August 14, 2025

**TO:** RMA – Planning Division  
Attention: Philip Hess

**FROM:** PWA-RT Advance Planning *CMS*  
Christopher Solis, Senior Engineering Manager  
Jesus Banuelos, Engineer IV *JB*

**SUBJECT: ENVIRONMENTAL DOCUMENT REVIEW**  
**PROJECT NO:** RMA 25-027  
**LEAD AGENCY:** Casitas Municipal Water District  
**PROJECT:** Casitas-Ojai Water System Consolidation Project

**PROJECT COMMENTS:**

Thank you for providing the County of Ventura with the opportunity to review and comment on the environmental review process for the Casitas-Ojai Water System Consolidation Project. This project involves pipeline installation, tank construction, tank rehabilitation, water treatment system upgrades, and pump station upgrades in Ojai and unincorporated Ventura County.

4.1

When designing the waterline please be aware the County has final approval for any infrastructure or installations in County right-of-way; specifically, the location of protruding facilities such as air-vac and blow-off valves. Involving the County during the plan check process would be beneficial to the project.

4.2

Please note that all work performed within the County right-of-way requires an encroachment permit. All road repairs shall be per County Standard Plates. Additionally, oversized and overweight vehicles on County roads require permits. Work-hour, seasonal, or peak-hour restrictions may apply.

4.3

Inquiries and permit applications can be submitted to the division listed below:

Ventura County Public Works – Roads & Transportation  
 800 South Victoria Avenue L#1620, Ventura, CA 93009  
 Phone: (805) 654-2055 / Fax: (805) 654-7681  
 Email: pwa.transpermits@ventura.gov

4.4

## Letter 4

**COMMENTER:** Christopher Solis, Ventura County Public Works – Roads & Transportation

**DATE:** August 14, 2025

### **Response 4.1**

The commenter thanks Casitas for the opportunity to review and comment on the environmental review process for the proposed project, and provides a summary of the proposed improvements. This comment does not warrant changes to the Draft IS-MND.

### **Response 4.2**

The commenter notes the County of Ventura has final approval authority over infrastructure or installations within County right-of-way, including the location of protruding facilities such as air-vac and blow-off valves, and recommends involving the County during the plan check process.

Casitas acknowledges the County's jurisdiction over facilities within County right-of-way and will coordinate with the appropriate County departments during the permitting process for compliance with applicable standards and requirements. This comment does not warrant changes to the Draft IS-MND.

### **Response 4.3**

The commenter notes all work within County right-of-way requires an encroachment permit and road repairs must conform to County Standard Plates. The commenter also notes oversized and overweight vehicles on County roads require permits, and work-hour, seasonal, or peak-hour restrictions may apply.

Casitas would obtain all necessary permits prior to construction, including encroachment and transportation permits, and would coordinate with the County for compliance with applicable standards and restrictions. This comment does not warrant changes to the Draft IS-MND.

### **Response 4.4**

The commenter provides contact information for submitting inquiries and permit applications. This comment does not warrant changes to the Draft IS-MND.

WATERSHED PLANNING AND PERMITS DIVISION  
800 South Victoria Avenue, Ventura, California 93009

**DATE:** August 7, 2025

**TO:** Philip Hess, Case Planner  
County of Ventura

**FROM:** Yunsheng Su, PWA-WP Case Reviewer

**SUBJECT:** RMA25-027  
APN:030017007  
CEQA Review Comments and Conditions

**PROJECT LOCATION:**

**Ventura County Public Works Agency**

**Legend**

- Contention Lines
- Radio Channels
- Flood Hazard Boundaries
- Flood Hazard Zones
- 1% Annual Chance Flood Hazard
- Regulated Freeway
- Special Freeway
- Area of Unimproved Flood Hazard
- 62% Annual Chance Flood Hazard
- Public Conditions 1% Annual Chance Flood
- Area with Reduced/No Drainage
- Area with No Drain to Lower

Scale: 1:250'

Distance Feet: 0 100.00

Map Date: 10/1/2010

Map Title: Ventura County Public Works Agency

Map Author: Ventura County Public Works Agency

Map Project: Ventura County Public Works Agency

Map Scale: 1:250'

Map Units: Feet

Map Projection: NAD 83

Map Data: Ventura County Public Works Agency

Map Legend: Ventura County Public Works Agency

Map Symbols: Ventura County Public Works Agency

Map Colors: Ventura County Public Works Agency

Map Lines: Ventura County Public Works Agency

Map Text: Ventura County Public Works Agency

Map Notes: Ventura County Public Works Agency

Map Footer: Ventura County Public Works Agency

153

**PROJECT DESCRIPTION:**

CMWD acquired the Ojai Water System in 2017 from Golden State Water Company. The proposed project would integrate the Ojai Water System with the Casitas Water System to address insufficient storage capacity in the Ojai Water System and provide compatible water treatment to both systems. The proposed project consists of five main components: 1) Pipeline installation, consisting of approximately 450 linear feet of a new 6-inch water pipeline at the Private Drive site in unincorporated Ventura County; as well as approximately 1,100 linear feet of a new 8-inch pipeline at the Foothill Road site, in unincorporated Ventura County and the City of Ojai; 2) Tank demolition, abandonment, and construction, consisting of demolition of the existing 1.0-million gallon concrete tank at the Arbolada Tank site in Ojai; abandonment of the existing Running Ridge tanks at the Running Ridge site in unincorporated Ventura County; and construction of a 1.0-million gallon welded steel tank at the Ojai East Tank site in Ojai; 3) Tank rehabilitation, consisting of rehabilitation of an existing 3.0-million gallon welded steel tank at the Ojai East Tank site in Ojai; 4) Water treatment, consisting of conversion of the existing treatment system at the Ojai Water System Wellfield in Ojai from chlorine to chloramines, which would involve installation of a new, approximately 2,700 linear feet discharge line, a new free chlorine analyzer, a new sample point for the analyzer, a new ammonia injection point, and new ammonia storage tanks and dosing pumps; 5) Booster pump station demolition and construction, consisting of demolition of the existing pump station at the Arbolada Tank site in Ojai; and construction of a temporary pump station and new pump station at the same site.

5.1  
(cont.)

**APPLICATION COMPLETENESS:**

Complete - from our area of concern.

5.2

**ENVIRONMENTAL IMPACT ANALYSIS:**

**Item 31a. Flood Control Facilities/Watercourses – Ventura County Public Works Agency, Watershed Protection is deemed to be Less Than Significant.**

The proposed project is situated about 50 feet from the McAndrew Wash, which is a WP jurisdictional redline channel. No new or modified direct stormwater drainage connections to this WP channel, activities within WP's easement, or activities over, under, or within the redline channel appear to be proposed or indicated on the applicant's submitted materials.

This proposed project would result in an increase of impervious area within the subject property. It is understood that impacts from the proposed increase in impervious area and stormwater drainage design within the project site will be required to be mitigated to less than significant under the conditions imposed by County of Ventura. The mitigation requires that runoff from the proposed project site be released at no greater than the existing flow rate and in such manner as to not cause an adverse impact downstream in peak discharge, velocity, or duration.

5.3

WP staff determines that the proposed project design with the conditions mentioned above mitigates the direct and indirect project-specific and cumulative impacts to flood control facilities and watercourses. Therefore, the environmental impact is less than significant (LS) on redline channels under the jurisdiction of the Ventura County Public Works Agency - Watershed Protection.

5.3  
(cont.)

**Item 17b. Hydraulic Hazards - FEMA is deemed to be Less Than Significant.**

The project site is in a location identified by the Federal Emergency Management Agency (FEMA) as an area of Special Flood Hazard Area Zone AE. This is evidenced on FEMA Map Panel 06111C0585F effective September 26, 2014. Therefore, the project must comply with the County of Ventura Floodplain Management Ordinance, which provides minimum standards for development in the Special Flood Hazard Area. The proposed development with the condition described below is therefore, deemed to be Less than Significant for Hydraulic Hazards - FEMA.

5.4

**WATERSHED PROTECTION COMMENTS:**

None.

5.5

**WATERSHED PROTECTION CONDITIONS:**

**Floodplain Development Permit**

**Purpose:** To comply with the Ventura County Floodplain Management Ordinance and Ventura County General Plan policies HAZ-2.1, HAZ-2.2, HAZ-2.3 and HAZ-2.5.

**Requirement:** The Permittee shall obtain a Floodplain Development Permit from the Ventura County Public Works Agency Floodplain Manager.

**Documentation:** A Floodplain Development Permit issued by the Public Works Agency Floodplain Manager.

5.6

**Timing:** The Floodplain Development Permit shall be obtained by the Applicant prior to issuance of a building permit or prior to ground disturbance if a building permit is not required.

**Monitoring and Reporting:** A copy of the approved Floodplain Development Permit shall be provided to the Building and Safety Department as well as maintained in the case file by the Public Works Agency.

**Elevation Certificate**

**Purpose:** To comply with the Ventura County Floodplain Management Ordinance and Ventura County General Plan policies HAZ-2.2 and HAZ-2.5 by obtaining an elevation certificate.

5.7

**Requirement:** The Permittee shall provide Elevation Certificate for each permitted structure.

**Documentation:** The Elevation Certificate(s) prepared by a licensed Civil Engineer or Licensed Public Land Survey.

**Timing:** The Elevation Certificate(s) shall be prepared prior to occupancy.

**Monitoring and Reporting:** A copy of the approved Elevation Certificate(s) shall be provided to the Building and Safety Department as well as maintained in the case file by the Public Works Agency.

5.7  
(cont.)

If you have any questions, please feel free to contact me by email at [Yunsheng.Su@Ventura.Org](mailto:Yunsheng.Su@Ventura.Org) or by phone at [805-654-2005](tel:805-654-2005).

5.8

END OF TEXT.

## Letter 5

**COMMENTER:** Yunsheng Su, Ventura County Public Works Watershed Protection, Watershed Planning and Permits Division

**DATE:** August 7, 2025

### Response 5.1

The commenter provides a summary of the proposed improvements. This comment does not warrant changes to the Draft IS-MND.

### Response 5.2

The commenter states the application is complete from their area of concern. This comment does not warrant changes to the Draft IS-MND.

### Response 5.3

The commenter notes the proposed project is located approximately 50 feet from McAndrew Wash, a Watershed Protection (WP) jurisdictional redline channel, and confirms no new or modified direct stormwater drainage connections, activities within WP's easement, or activities over, under, or within the redline channel are proposed. The commenter also notes the project would increase impervious area and outlines County requirements for mitigating stormwater impacts to less than significant levels, including maintaining existing flow rates and avoiding adverse downstream impacts.

Casitas acknowledges WP's jurisdiction and requirements, and confirms the project has been designed to comply with applicable County standards for stormwater management. As noted in Environmental Checklist Section 10, *Hydrology and Water Quality*, the project would not exceed drainage system capacity and would implement best management practices to prevent runoff impacts. This comment does not warrant changes to the Draft IS-MND.

### Response 5.4

The commenter notes the project site is located within Special Flood Hazard Area Zone AE as identified by the Federal Emergency Management Agency (FEMA) on Map Panel 06111C0585F, effective September 26, 2014, and references the provisions of the County of Ventura Floodplain Management Ordinance. The commenter further notes, following compliance with the Floodplain Management Ordinance, the proposed project would, in the County's opinion, have a less than significant impact for hydraulic hazards.

As discussed in Environmental Checklist Section 10, *Hydrology and Water Quality*, the project would not result in significant flood hazard impacts. The project would comply with standards for development in a Special Flood Hazard Area. This comment does not warrant changes to the Draft IS-MND.

### Response 5.5

The commenter notes there are no comments regarding watershed protection. This comment does not warrant changes to the Draft IS-MND.

### **Response 5.6**

The commenter requests Casitas obtain a Floodplain Development Permit from the Ventura County Public Works Agency Floodplain Manager, in accordance with the Ventura County Floodplain Management Ordinance and General Plan policies HAZ-2.1, HAZ-2.2, HAZ-2.3, and HAZ-2.5.

Casitas will coordinate with the Ventura County Public Works Agency Floodplain Manager to determine the appropriate permitting action.

### **Response 5.7**

The commenter requests Casitas obtain Elevation Certificates for each permitted structure, in accordance with the Ventura County Floodplain Management Ordinance and General Plan policies HAZ-2.2 and HAZ-2.5.

Casitas will coordinate with the Ventura County Public Works Agency Floodplain Manager to determine the appropriate permitting action.

### **Response 5.8**

The commenter provides contact information for submitting questions. This comment does not warrant changes to the Draft IS-MND.



State of California – Natural Resources Agency  
DEPARTMENT OF FISH AND WILDLIFE  
South Coast Region  
3883 Ruffin Road  
San Diego, CA 92123  
[wildlife.ca.gov](http://wildlife.ca.gov)

GAVIN NEWSOM, Governor  
CHARLTON H. BONHAM, Director



August 22, 2025

Julia Aranda  
Casitas Municipal Water District  
1055 Ventura Avenue  
Oak View, CA 93022  
[jaranda@casitaswater.com](mailto:jaranda@casitaswater.com)

**SUBJECT: MITIGATED NEGATIVE DECLARATION FOR THE CASITAS-OJAI WATER SYSTEM CONSOLIDATION PROJECT, SCH NO. 2025070808; VENTURA COUNTY, CA**

Dear Julia Aranda:

The California Department of Fish and Wildlife (CDFW) has reviewed the Mitigated Negative Declaration (MND) from the Casitas Municipal Water District (Casitas) for the Casitas-Ojai Water System Consolidation Project (Project) pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines<sup>1</sup>.

6.1

Thank you for the opportunity to provide comments and recommendations regarding Project activities that may affect California fish and wildlife. Likewise, CDFW appreciates the opportunity to comment on 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.

**CDFW 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 & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (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 (Fish & G. Code, § 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 fish and wildlife resources.

6.2

CDFW may also act as a Responsible Agency under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise

<sup>1</sup> CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

Julia Aranda  
Casitas Municipal Water District  
August 22, 2025  
Page 2 of 23

regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW’s lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 et seq.). Likewise, to the extent implementation of the Project as proposed may result in “take” as defined by State law<sup>2</sup> of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.) or the Native Plant Protection Act (NPPA; Fish & G. Code, §1900 et seq.), the Project proponent may seek related take authorization as provided by the Fish and Game Code.

6.2  
(cont.)

PROJECT DESCRIPTION SUMMARY

**Proponent:** Casitas Municipal Water District

**Objective:** The proposed Project would integrate the existing Ojai Water System (OWS) with the existing Casitas Water System to address insufficient storage capacity in the OWS and provide compatible water treatment to both systems. The Project consists of five main components: pipeline installation; tank demolition and construction; tank rehabilitation; water treatment; and booster pump station demolition and construction.

**Location:** The Project site is comprised of multiple areas in unincorporated Ventura County and the City of Ojai, as described below:

- Private Drive: The site is a private unnamed roadway extending west from Foothill Road in unincorporated Ventura County. Latitude: 34.461829, Longitude -119.256711.
- Foothill Road: The site is on the border of unincorporated Ventura County and the City of Ojai, at the intersection of Foothill Road and Fairview Road. Latitude: 34.460680, Longitude -119.256172.
- Running Ridge Tanks: The site is near private residences and located in unincorporated Ventura County. The site consists of vegetated land north of Running Ridge Trail. Latitude: 34.461372, Longitude -119.259097.
- Arbolada Tank and Pump Station: The site is located in the City of Ojai and is approximately 1.2 acres, south of Fairview Road. Latitude: 34.457953, Longitude -119.259697.
- Ojai East Tank: The site is located in unincorporated Ventura County and is approximately 3.7 acres, south of the intersection of Reeves Road and McAndrew Road. Latitude: 34.447808, Longitude -119.184714.
- OWS Wellfield: The site is located in the City of Ojai and is approximately 3.2 acres, south of Grand Avenue. Latitude: 34.453174, Longitude -119.221851.

6.3

**Timeframe:** The timeframe for the Project components vary. The pipeline installation along the Private Drive site and Foothill Road would take six to eight weeks. The Arbolada and Running Ridge tanks components would take three to four months. The

<sup>2</sup> “Take” is defined in Section 86 of the Fish and Game Code as “hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill.”

Julia Aranda  
Casitas Municipal Water District  
August 22, 2025  
Page 3 of 23

Ojai East Tanks component would take six to eight months. The Ojai Water System Chloramine Conversion component would take six to eight months. The Arbolada Booster Pump Station component would take six to eight months.

**Biological Setting:** The Project sites are characterized as rural, low-density residential, vegetated open space, and agricultural land. The developed areas consist of residential neighborhoods, paved and dirt roads, and the existing Casitas infrastructure (e.g., tanks and pump stations). Vegetation communities and land cover types include black sage (*Salvia mellifera*) – California sagebrush (*Artemisia californica*) scrub, coast live oak (*Quercus agrifolia*) woodland, and mulefat (*Baccharis salicifolia*) thickets. Coast live oak, valley oak (*Quercus lobata*), and California sycamore (*Platanus racemosa*) were observed throughout the study area. Ornamental species are present and include pepper tree (*Schinus molle*), Russian olive (*Elaeagnus angustifolia*), agave (*Agave* spp.), Mexican fan palm (*Washingtonia robusta*), and rosemary (*Rosmarinus officinalis*). The herbaceous layer is primarily bare or disturbed with non-native annual species, such as short-podded mustard (*Hirschfeldia incana*), ripgut brome (*Bromus diandrus*), red brome (*Bromus rubens*), and annual yellow sweetclover (*Melilotus indicus*). Within the survey area there are two water features: San Antonio Creek and an unnamed intermittent stream. Both features are not anticipated to be impacted by Project activities.

A general survey was conducted on May 21, 2025 to document current site conditions and as part of the potential species evaluation along with desk review of various sources. Four special status species were determined to potentially occur within the survey area which include Crotch’s bumble bee (*Bombus crotchii*), California legless lizard (*Anniella* spp.), coastal whiptail (*Aspidoscelis tigris stejnegeri*), and coast patch-nosed snake (*Salvadora hexalepis virgultea*).

6.3  
(cont.)

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist Casitas in adequately identifying and/or mitigating the Project’s significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources.

COMMENT # 1: Impacts to Crotch’s Bumble Bee

**Issue:** The Project has the potential to impact suitable nesting habitat and foraging opportunities for Crotch’s bumble bee or may result in direct or indirect mortality.

**Specific impact:** The Project may result in temporal or permeant loss of suitable nesting and foraging habitat for Crotch’s bumble bee. Project ground disturbing activities may cause death or injury of adults, eggs, and larva; burrow collapse; nest abandonment; and reduced nest success.

**Why impact would occur:** According to CDFW’s Crotch’s Bumble Bee Range – CDFW dataset (CDFWa), the Project area is within the current range for Crotch’s bumble bee.

6.4

Julia Aranda  
Casitas Municipal Water District  
August 22, 2025  
Page 4 of 23

The MND also acknowledges that suitable habitat for this species is near some of the Project sites. The MND specifically states that there is suitable habitat for Crotch's bumble bee near the OWS Wellfield site and the Running Ridge Tank site. The MND also states that although impacts to nesting Crotch's bumble bee is not expected, impacts to transiting bees may occur during worker presence at the Running Ridge site.

If the Project proceeds without appropriate focused surveys and mitigation, the Project may result in mortality and/or injury of undetected individual Crotch's bumble bee that may be present during Project activities. The Project's ground and/or vegetation disturbance activities could result in significant impacts to Crotch's bumble bee, including loss of foraging resources, changes in foraging behavior, burrow collapse, nest abandonment, reduced nest success, reduced health and vigor of eggs, young, and/or queens, and direct mortality.

For reference, Crotch's bumble bees primarily nest from late February through late October and typically nest underground in abandoned small mammal burrows. However, they may also nest under perennial bunch grasses, thatched annual grasses, under-brush piles, in old bird nests, and in dead trees or hollow logs (Williams et al. 2014; Hatfield et al. 2012).

**Evidence impact may be significant:** Crotch's bumble bee is a candidate species protected under CESA, and, as such, is granted full protection under CESA. The California Fish and Game Commission accepted a petition to list the Crotch's bumble bee as endangered under CESA, determining the listing "may be warranted" and advancing the species to the candidacy stage of the CESA listing process. Take of any endangered, threatened, candidate species that results from the Project is prohibited, except as authorized by State law (Fish & G. Code, §§ 86, 2062, 2067, 2068, 2080, 2085; Cal. Code Regs., tit. 14, § 786.9). CDFW considers impacts to species that are candidates for CESA listing to be significant, under CEQA. Crotch's bumble bee meets the CEQA definition of rare, threatened, or endangered (CEQA Guidelines, § 15380). Therefore, take of Crotch's bumble bee could require a mandatory finding of significance by Casitas (CEQA Guidelines, § 1565).

## **Recommended Potentially Feasible Mitigation Measure(s)**

### **Recommendation #1: Crotch's Bumble Bee**

The MND should be revised to provide a thorough discussion on the Project's potential direct and indirect impacts on Crotch's bumble bee throughout the entire Project area. If the Project may impact Crotch's bumble bee, the MND should incorporate measures to minimize, and/or mitigate potential impacts to Crotch's bumble bee as well as habitat supporting the species. The discussion should be of a depth and scope that a CESA Incidental Take Permit (ITP) can be issued based on the analysis provided in the final document.

6.4  
(cont.)

Julia Aranda  
Casitas Municipal Water District  
August 22, 2025  
Page 5 of 23

**Recommendation #2: CESA and CEQA**

CDFW's issuance of an ITP for a Project is subject to CEQA. As a Responsible Agency, CDFW may consider the CEQA document from the lead agency/Project proponent for the Project. However, additional documentation may be required as part of an ITP application for the Project in order for CDFW to adequately develop an accurate take analysis and identify measures that would fully mitigate for take of CESA-listed species. To minimize additional requirements by CDFW pursuant to Fish and Game Code, section 2081 and/or under CEQA, the Project's CEQA document should fully identify the potential impacts to Crotch's bumble bee and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the ITP.

**Mitigation Measure #1: Crotch's Bumble Bee Surveys**

The Project proponent shall retain a qualified biologist with the appropriate handling permits to conduct focused surveys. Focused surveys shall follow CDFW's Survey Considerations for California Endangered Species Act Candidate Bumble Bee Species (CDFW 2023). Focused surveys shall also be conducted throughout the entire Project area and during the appropriate flying season to ensure no missed detection of Crotch's bumble bee occurs. Survey results, including negative findings, shall be submitted to CDFW prior to implementing Project ground-disturbing and/or vegetation removal activities.

**Mitigation Measure #2: Incidental Take Permit**

If Crotch's bumble bee is detected on site, the Project proponent shall coordinate with CDFW to determine next steps and whether appropriate take authorization from CDFW is necessary (pursuant to Fish & Game Code, § 2080 et seq).

**COMMENT # 2: Impacts to Western Burrowing Owl (*Athene cunicularia*)**

**Issue:** The Project has the potential to impact wintering habitat of western burrowing owl.

**Specific impact:** The Project may result in the temporary loss of wintering habitat for western burrowing owl due to the demolition and construction of tanks as well as other Project ground disturbing activities.

**Why impact would occur:** According to CDFW's Western Burrowing Owl Range (CDFWb), the Project area lies within the current range for western burrowing owl, specifically wintering habitat. Burrowing owls are well adapted to open, dry annual and perennial grasslands, deserts, and scrublands with low-grading vegetation. They can be found on relatively flat expanses and vacant lots. Burrowing owls are dependent on burrows at all times of the year for survival and/or reproduction. Loss of access to burrows may result in varying levels of increased stress on burrowing owls and could increase predation.

6.4  
(cont.)

6.5

Julia Aranda  
Casitas Municipal Water District  
August 22, 2025  
Page 6 of 23

**Evidence impact would be significant:** On October 10, 2024, the California Fish and Game Commission determined that listing of western burrowing owl as endangered as a candidate CESA species was warranted. If Project activities could result in take, appropriate CESA authorization (i.e., an ITP under Fish and G. Code, § 2081) should be obtained prior to commencement of Project activities. Take of any endangered, threatened, or candidate species that results from the Project is prohibited, except as authorized by State law (Fish & G. Code, §§ 86, 2062, 2067, 2068, 2080, 2085; Cal. Code Regs., tit. 14, § 786.9). Take of individual burrowing owls and their nests is defined by Fish and Game Code, section 86, and prohibited by sections 3503, 3503.5 and 3513.

### **Recommended Potentially Feasible Mitigation Measure(s)**

#### **Recommendation #3: Western Burrowing Owl**

CDFW recommends that Casitas evaluate the direct and indirect impacts to burrowing owl within the Project areas, particularly in suitable habitat, and provide its findings in the MND. The MND should also incorporate measures to avoid, minimize, and/or mitigate potential impacts to western burrowing owl as well as its potential and/or suitable habitats.

6.5  
(cont.)

#### **Mitigation Measure #3: Western Burrowing Owl Surveys**

Protocol-level surveys shall be conducted by a CDFW-approved Designated Biologist, following the guidelines in CDFW's Staff Report on Burrowing Owl Mitigation (CDFG 2012) prior to ground disturbance and/or vegetation removal activities. All biologists surveying and/or monitoring for burrowing owl shall obtain a Memorandum of Understanding<sup>3</sup> issued by CDFW. Early consultation with CDFW is encouraged to ensure all necessary permits are obtained.

#### **Mitigation Measure #4: Incidental Take Permit**

If Project activities will impact western burrowing owl and their habitat, the Project proponent shall coordinate with CDFW to determine next steps and whether appropriate take authorization from CDFW is necessary (pursuant to Fish & Game Code, § 2080 et seq).

<sup>3</sup> <https://wildlife.ca.gov/Conservation/CESA/Permitting#550391512-memorandum-of-understanding-mou--2081-a>

Julia Aranda  
Casitas Municipal Water District  
August 22, 2025  
Page 7 of 23

### **COMMENT # 3: Impacts on California Species of Special Concern (Coastal Whiptail, California Legless Lizard, Coast Patch-Nosed Snake)**

**Issue:** The mitigation measure proposed in the MND may not sufficiently minimize Project impacts on Species of Special Concern (SSC), namely coastal whiptail, California legless lizard, and coast patch-nosed snake.

**Specific Impact:** Direct impacts to coastal whiptail, California legless lizard, and coast patch-nosed snake could result from Project activities (e.g., equipment staging, mobilization, and grading); ground disturbance; trampling or crushing from construction equipment, vehicles, and foot traffic.

**Why impact would occur:** The MND states that coastal whiptail, California legless lizard, and coast patch-nosed snake have potential to occur on the Project site(s) during Project activities. To reduce Project impacts, Mitigation Measure (MM) BIO-1 Worker Environmental Awareness Program was proposed in the MND. Mitigation Measure BIO-1 states that prior to initiation of construction activities (including staging and mobilization) at only the Running Ridge Tank and OWS Wellfield sites, all personnel associated with project construction at these sites shall attend a Worker Environmental Awareness Program (WEAP) training, conducted by a qualified biologist. The MND did not include any preconstruction surveys for SSC or other native species. Project ground-disturbing activities such as vegetation removal and grading would result in habitat destruction, causing the death or injury of adults, juveniles, eggs, or hatchlings. Habitat loss on a local and regional scale is a major cause of population decline for these SSC species; removal or disturbance of confirmed SSC habitat may be considered a significant impact and should be mitigated appropriately.

6.6

**Evidence impact would be significant:** A California Species of Special Concern 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:

- 1) If the species is extirpated from the State or, in the case of birds, is extirpated in its primary season or breeding role;
- 2) If the species is listed as threatened or endangered under ESA-, but not CESA-, threatened, or endangered;
- 3) If the species meets the State definition of threatened or endangered but has not formally been listed;
- 4) If the species 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,
- 5) If 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 threatened or -endangered status (CDFWc).

Julia Aranda  
Casitas Municipal Water District  
August 22, 2025  
Page 8 of 23

CEQA provides protection not only for CESA-listed species, but for any species including but not limited to SSC that can be shown to meet the criteria for State listing. These SSC meet the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines, § 15380). The MND does not provide mitigation for potential impacts on SSC. Inadequate avoidance, minimization, and mitigation measures for impacts to sensitive or special status species will result in the Project continuing to have a substantial adverse direct, indirect, and cumulative effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species by CDFW.

**Recommended Potentially Feasible Mitigation Measure(s)**

**MM BIO-1: Worker Environmental Awareness Program**

Casitas should revise MM BIO-1 to incorporate the underlined language and omit language in strikethrough. The current measure specifies that the WEAP training will be conducted for two sites of the Project. This training should occur for all Project sites:

Prior to initiation of ~~construction Project~~ activities (including staging and mobilization) ~~at the Running Ridge Tank and OWS Wellfield sites~~, all personnel associated with the Project activities ~~project construction at these sites~~ shall attend a Worker Environmental Awareness Program (WEAP) training, conducted by a qualified biologist, to aid workers in recognizing special status biological resources which may occur in the project site. This training shall include information about Crotch’s bumblebee, special status reptiles (California legless lizard, coast whiptail, and coast patch-nosed snake), nesting birds, and protected trees.

The specifics of this program shall include identification of special status species and habitats, a description of the regulatory status and general ecological characteristics of special status resources, and review of the limits of construction and measures required to avoid and minimize impacts to biological resources within the work area. A fact sheet conveying this information shall also be prepared for distribution to all contractors, their employees, and other personnel involved with construction of the project. Employees shall sign a form provided by the trainer documenting they have attended the WEAP and understand the information presented to them. The crew foreman shall be responsible for ensuring crew members adhere to the guidelines and restrictions designed to avoid impacts to special status species.

**Mitigation Measure #5: Pre-Work Biological Surveys**

A qualified biologist shall conduct two pre-Project surveys within and adjacent to the proposed work area(s) within a one-week period prior to the start of Project-related activities. Pre-Project surveys shall include: a) general surveys for botanical and wildlife resources; b) the identification of any active bird nests, burrows, and/or woodrat nests (if active, they should be recorded, monitored for species observations, and mapped); and,

6.6  
(cont.)

Julia Aranda  
Casitas Municipal Water District  
August 22, 2025  
Page 9 of 23

c) work areas with flowing or standing water shall be visibly surveyed for any aquatic species that may be impacted by Project activities.

**Mitigation Measure #6: Injured or Dead Wildlife**

If any special status wildlife species are found harmed/injured or dead, work in the immediate area shall stop immediately, the qualified biologist should be notified, and dead or injured wildlife documented immediately. A formal report should be sent to CDFW within three calendar days of the incident or finding. The report shall include the date, time of the finding or incident (if known), and location of the carcass or injured animal and circumstances of its death or injury (if known). 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.

6.6  
(cont.)

**COMMENT # 4: Nesting Bird Impacts**

**Issue:** The Project could impact raptors or other nesting birds through direct mortality or abandonment of nests.

**Specific impact:** Suitable bird nesting habitat occurs adjacent to the Project sites. Indirect impacts may occur from vibration, noise, dust, and increased human activity, which could lead to nest abandonment.

**Why impact would occur:** The MND incorporates avian protection measures through MM BIO-2 and MM BIO-3. BIO-2 indicates that Project activities shall occur outside of the bird breeding season (February 1 through August 31), if practicable. MM BIO-3 indicates that a biological survey will occur within seven calendar days prior to the start of construction to determine the presence or absence of nests at only the Running Ridge Tank and OWS Wellfield sites. MM BIO-3 does not specify buffer distances if an active nest is observed. Without appropriate buffers or avoidance measures, Project activities may result in take of nesting birds, violating Fish and Game Code and the Migratory Bird Treaty Act.

6.7

**Evidence impact may be significant:** California Fish and Game Code, sections 3503, 3503.5, and 3513 require the avoidance of the incidental loss of fertile eggs or nestlings, or activities that lead to nest abandonment (Fish & G. Code, § 3503, 3503.5, and 3513 et seq.).

**Recommended Potentially Feasible Mitigation Measure(s)**

**MM BIO-3: Nesting Bird Survey**

Casitas should revise MM BIO-3 to incorporate the underlined language and omit language in strikethrough.

Julia Aranda  
Casitas Municipal Water District  
August 22, 2025  
Page 10 of 23

If construction must begin during the breeding season, then a pre-construction nesting bird survey shall be conducted no more than three ~~seven~~ days prior to initiation of Project activities ~~ground disturbance and vegetation removal activities~~. The nesting bird pre-construction survey shall be conducted on foot inside the project footprint, including a 100-foot buffer (300-foot for raptors), and in inaccessible areas (e.g., private lands) from afar using binoculars to the extent practicable. The survey shall be conducted by a qualified biologist familiar with the identification of avian species known to occur in southern California coastal communities. If nests are found, an avoidance buffer with a minimum width of 100 feet (up to 300-500 feet for special-status species and 500 feet for raptors) should be established around the nest ~~(dependent upon the species, the proposed work activity, and existing disturbances associated with land uses outside of the site)~~ shall be determined and demarcated by the qualified 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 or until the young are no longer dependent on the nest, which shall be determined by the qualified biologist. No Project ~~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.~~ A qualified biologist should be on site daily to monitor vegetation clearing and grading activities.

6.7  
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**COMMENT # 5: Impacts on Oak Woodlands**

**Issue:** The Project may impact coast live oak and valley oak during Project activities.

**Specific Impact:** The Project could result in the removal and/or death of oaks and other native trees that were not fully identified in the MND.

**Why impacts would occur:** The MND, Biological Resources section, page 30, states that no riparian habitat or sensitive plant communities are documented within the project site, but coast live oak woodlands are present within a 50-foot buffer of the Ojai East Tank site. On page 32, there is conflicting information where the MND states that protected trees were observed within the Project site and impacts may include construction equipment compacting soil around the trees as well as disturbance of the crown and root zone from trenching, grading, and clearance pruning. The MND incorporated MM BIO-5 Arborist Study, which states that an inventory of all trees within or adjacent to the Project footprint will be developed. MM BIO-5 also states that a Tree Protection Plan will be developed and will incorporate potential requirements for transplanting or replacement tree plantings, but no compensatory mitigation was proposed for impacts. The Project could remove or injure oak trees or other native trees, which is considered a significant impact and should be mitigated appropriately.

6.8

**Evidence impacts would be significant:** Removal of oaks or other native trees may introduce edge effects. Edge effects that could impact rare, special status, and sensitive

Julia Aranda  
Casitas Municipal Water District  
August 22, 2025  
Page 11 of 23

biological resources include encroachment, introduction of non-native plants and pests, and increased fire risk. Oak woodlands have higher levels of biodiversity than any other terrestrial ecosystem in California. Over 330 species of birds, mammals, reptiles, and amphibians depend on oak woodlands in California at some stage in their life cycle (CalPIF 2002). Oak trees provide nesting and perching habitat for approximately 170 species of birds. Large oak trees in oak woodland habitats are important for cover, nesting sites for cup nesting species and cavity nesting species, as well as caching sites for birds storing acorns (CalPIF 2002). Oak woodlands also serve several important ecological functions within an ecosystem such as protecting soils from erosion and land sliding, regulating water flow in watersheds, and maintaining water quality in streams and rivers.

CDFW considers oak woodlands to be a sensitive plant community. Oak trees and woodlands are protected by the Oak Woodlands Conservation Act (pursuant under Fish and G. Code, § 1360-1372) and Public Resources Code, section 21083.4 due to the historic and ongoing loss of these resources. Moreover, CDFW's Areas of Conservation Emphasis - Significant Habitats dataset includes oak woodlands as a Terrestrial Significant Habitat based on its priority for conservation and acquisition planning for some counties, local jurisdictions, and the Wildlife Conservation Board (CDFWd).

Valley oak and coast live oak woodland are Sensitive Natural Communities with a State rarity rank of S3. Sensitive Natural Communities are communities that are of limited distribution State-wide or within a county or region and are often vulnerable to environmental effects of projects. CDFW considers plant communities, alliances, and associations with a State ranking of S1, S2, and S3 as sensitive and declining at the local and regional level. An S3 ranking indicates there are 21 to 100 viable occurrences of this community in existence in California, S2 has six to 20 occurrences, and S1 has fewer than six viable occurrences (Sawyer et al. 2009). Impacts to sensitive natural communities should be considered significant under CEQA unless they are clearly mitigated below a level of significance.

For reasons discussed above, the Project may 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 CDFW or USFWS.

### **Recommended Potentially Feasible Mitigation Measure(s)**

#### **Recommendation #4: Compensatory Mitigation for Impacts to Oaks**

For impacts on oak woodlands, Casitas should offset the loss by no less than 3:1 of the total acreage of woodlands lost. This should include woodlands that would be subject to permanent fuel modification requirements. Casitas should restore functioning and self-sustaining woodlands of similar composition, structure, and function to woodlands impacted. Mitigation should include restoration of structurally diverse understory vegetation species (i.e., grass, forb, shrub, subshrub, vine) occurring in the impacted

6.8  
(cont.)

Julia Aranda  
Casitas Municipal Water District  
August 22, 2025  
Page 12 of 23

natural communities. Acorns and/or seedlings should originate from plants/trees of the same species (i.e., genus, species, subspecies, and variety) as the species impacted.

**Recommendation #5: Woodland Restoration Plan**

Prior to removing any oak trees or the understory vegetation, Casitas should prepare a Woodland Restoration Plan. The Woodland Restoration Plan should prescribe the following:

- 1) Species-specific planting methods;
- 2) Planting schedule;
- 3) Measures to control exotic vegetation and protection from herbivory;
- 4) Measurable goals and success criteria for establishing self-sustaining populations (e.g., percent survival rate, absolute cover). Measurable success criteria should be based onsite/habitat conditions prior to impact and/or functional local native oak shrublands/woodlands as reference sites;
- 5) Contingency measures if the success criteria is not met;
- 6) Long-term monitoring for at least 10 years;
- 7) Adaptive management techniques, including replacement plants if necessary; and,
- 8) Annual reporting criteria and requirements.

6.8  
(cont.)

**Recommendation #6: Off-site Mitigation**

For off-site mitigation, to ensure permanent protection and effective long-term management of habitat, Casitas should protect mitigation lands in perpetuity under a conservation easement dedicated to a local land conservancy or other appropriate entity qualified and approved by CDFW to hold and manage mitigation lands. An appropriate non-wasting endowment should be provided for the long-term management of mitigation lands. A conservation easement and endowment funds should be fully acquired, established, transferred, or otherwise executed prior to any ground-disturbing activities and vegetation removal.

**ADDITIONAL COMMENTS**

**Mitigation and Monitoring Reporting Plan.** CDFW recommends the environmental document include mitigation measures recommended in this letter. CDFW has provided comments via a mitigation monitoring and reporting plan to assist in the development of feasible, specific, detailed (i.e., responsible party, timing, specific actions, location), and fully enforceable mitigation measures (CEQA Guidelines, § 15097; Pub. Resources Code, § 21081.6). Casitas is welcome to coordinate with CDFW to further review and refine the Project’s mitigation measures. Per Public Resources Code, section 21081.6(a)(1), CDFW has provided a summary of our suggested mitigation measures and recommendations in the form of an attached Draft Mitigation Monitoring and Reporting Plan (Attachment A).

6.9

Julia Aranda  
 Casitas Municipal Water District  
 August 22, 2025  
 Page 13 of 23

## ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). The [CNDDDB website](https://wildlife.ca.gov/Data/CNDDDB)<sup>4</sup> provides direction regarding the types of information that should be reported and allows on-line submittal of field survey forms.

6.10

In addition, information on special status native plant populations and sensitive natural communities, should be submitted to CDFW's Vegetation Classification and Mapping Program using the [Combined Rapid Assessment and Relevé Form](#)<sup>5</sup>.

Casitas should ensure that any data collected for the MND is properly submitted.

## FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing fee is required in order 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.)

6.11

## CONCLUSION

CDFW appreciates the opportunity to comment on the MND to assist Casitas in identifying and mitigating Project impacts on biological resources. CDFW requests an opportunity to review and comment on any response that Casitas has to our comments and to receive notification of any forthcoming hearing date(s) for the Project (CEQA Guidelines, § 15073(e)).

6.12

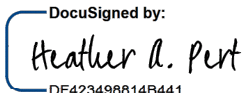
<sup>4</sup> <https://wildlife.ca.gov/Data/CNDDDB>

<sup>5</sup> <https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities/Submit>

Julia Aranda  
Casitas Municipal Water District  
August 22, 2025  
Page 14 of 23

Questions regarding this letter or further coordination should be directed to Mayra Molina, Senior Environmental Scientist (Specialist)<sup>6</sup>.

Sincerely,

DocuSigned by:  
  
DF423498814B441...  
Heather A. Pert  
Environmental Program Manager  
South Coast Region

6.12  
(cont.)

## ATTACHMENTS

Attachment A: Draft Mitigation, Monitoring, and Reporting Program

ec: California Department of Fish and Wildlife  
Heather Pert, Environmental Program Manager  
Baron Barrera, Senior Environmental Scientist (Supervisory)  
Mayra Molina, Senior Environmental Scientist (Specialist)

United States Fish and Wildlife Service  
Christine Medak

Office of Planning and Research  
[State.Clearinghouse@opr.ca.gov](mailto:State.Clearinghouse@opr.ca.gov)

## REFERENCES

[CDFW] California Department of Fish and Game (CDFG). 2012. Staff Report on Burrowing Owl Mitigation. Available at:  
<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=83843>

[CDFW] California Department of Fish and Wildlife. 2023. Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species. Available from: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=213150&inline>

[CDFWa] California Department of Fish and Wildlife. 2025. Crotch's Bumble Bee Range Dataset 3095. Available at CDFW's Biogeographic Information and Observation System, <https://wildlife.ca.gov/Data/BIOS>

[CDFWb] California Department of Fish and Wildlife. 2025. Western Burrowing Owl Range Dataset 907. Available at CDFW's Biogeographic Information and Observation System, <https://wildlife.ca.gov/Data/BIOS>

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<sup>6</sup> Phone: (562) 723-8734; Email: [Mayra.Molina@wildlife.ca.gov](mailto:Mayra.Molina@wildlife.ca.gov)

Julia Aranda  
Casitas Municipal Water District  
August 22, 2025  
Page 15 of 23

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Hatfield, R, S Jepsen, E Mader, S H Black, and M Shepherd. 2012. Conserving Bumble Bees Guidelines for Creating and Managing Habitat for America's Declining Pollinators. Portland, OR: The Xerces Society for Invertebrate Conservation

Sawyer, J. O., Keeler-Wolf, T., and Evens J.M. 2009. A manual of California Vegetation, 2nd ed. ISBN 978-0-943460-49-9

Julia Aranda  
 Casitas Municipal Water District  
 August 22, 2025  
 Page 16 of 23

## **ATTACHMENT A: DRAFT MITIGATION MONITORING AND REPORTING PROGRAM (MMRP)**

CDFW provides the following language to be incorporated into the MMRP for the Project.

| <b>Mitigation Measure</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | <b>Timing</b>               | <b>Responsible Party</b> |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|--------------------------|
| <p><b>Recommendation #1: Crotch's Bumble Bee</b></p> <p>The Project should consider the potential direct and indirect impacts on Crotch's bumble bee throughout the entire Project area. If the Project may impact Crotch's bumble bee, the EIR should incorporate measures to minimize, and/or mitigate potential impacts to Crotch's bumble bee as well as habitat supporting the species. The discussion should be of a depth and scope that a CESA Incidental Take Permit (ITP) can be issued based on the analysis provided in the final document.</p>                                                                                                                                                                                                                                                    | Prior to Project Initiation | Lead Agency              |
| <p><b>Recommendation #2: CESA and CEQA</b></p> <p>CDFW's issuance of an ITP for a Project is subject to CEQA. As a Responsible Agency, CDFW may consider the CEQA document from the lead agency/Project proponent for the Project. However, additional documentation may be required as part of an ITP application for the Project in order for CDFW to adequately develop an accurate take analysis and identify measures that would fully mitigate for take of CESA-listed species. To minimize additional requirements by CDFW pursuant to Fish and Game Code section 2081 and/or under CEQA, the Project's CEQA document should fully identify the potential impacts to Crotch's bumble bee and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the ITP.</p> | Prior to Project Initiation | Lead Agency              |

Julia Aranda  
 Casitas Municipal Water District  
 August 22, 2025  
 Page 17 of 23

| Mitigation Measure                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Timing                                                         | Responsible Party                      |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------|----------------------------------------|
| <p><b>Mitigation Measure #1: Crotch's Bumble Bee Surveys</b></p> <p>The Project proponent shall retain a qualified entomologist(s) with the appropriate handling permits to conduct focused surveys. Focused surveys shall follow CDFW's Survey Considerations for California Endangered Species Act Candidate Bumble Bee Species (CDFW 2023). Focused surveys shall also be conducted throughout the entire Project area and during the appropriate flying season to ensure no missed detection of Crotch's bumble bee occurs. Survey results, including negative findings, shall be submitted to CDFW prior to implementing Project ground-disturbing and/or vegetation removal activities.</p> | <p>Prior to Project Initiation/During Project Construction</p> | <p>Lead Agency/Qualified Biologist</p> |
| <p><b>Mitigation Measure #2: Incidental Take Permit</b></p> <p>If Crotch's bumble bee is detected on site, the Project proponent shall coordinate with CDFW to determine next steps and whether appropriate take authorization from CDFW is necessary (pursuant to Fish &amp; Game Code, § 2080 et seq).</p>                                                                                                                                                                                                                                                                                                                                                                                      | <p>Prior to Project Initiation</p>                             | <p>Lead Agency</p>                     |
| <p><b>Recommendation #3: Western Burrowing Owl</b></p> <p>CDFW recommends that the addendums evaluate the direct and indirect impacts to burrowing owl within the proposed AWPf site and any other Project areas that may provide suitable habitat. The addendums should incorporate measures to avoid, minimize, and/or mitigate potential impacts to western burrowing owl as well as its habitat.</p>                                                                                                                                                                                                                                                                                          | <p>Prior to Project Initiation</p>                             | <p>Lead Agency</p>                     |

Julia Aranda  
 Casitas Municipal Water District  
 August 22, 2025  
 Page 18 of 23

| Mitigation Measure                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Timing                                                         | Responsible Party                      |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------|----------------------------------------|
| <p><b>Mitigation Measure #3: Western Burrowing Owl Surveys</b></p> <p>Protocol-level surveys shall be conducted by a CDFW-approved Designated Biologist, following the guidelines in CDFW's Staff Report on Burrowing Owl Mitigation (CDFG 2012) prior to ground disturbance and/or vegetation removal activities. All biologists surveying and/or monitoring for burrowing owl shall obtain a Scientific Collecting Permit<sup>7</sup> issued by CDFW. Early consultation with CDFW is encouraged to ensure all necessary permits are obtained.</p>                                                                                                                          | <p>Prior to Project Initiation/During Project Construction</p> | <p>Lead Agency/Qualified Biologist</p> |
| <p><b>Mitigation Measure #4: Incidental Take Permit</b></p> <p>If Project activities will impact western burrowing owl and their habitat, the Project proponent shall coordinate with CDFW to determine next steps and whether appropriate take authorization from CDFW is necessary (pursuant to Fish &amp; Game Code, § 2080 et seq).</p>                                                                                                                                                                                                                                                                                                                                   | <p>Prior to Project Initiation</p>                             | <p>Lead Agency</p>                     |
| <p><b>MM BIO-1: Worker Environmental Awareness Program</b></p> <p>Prior to initiation of construction <del>Project</del> activities (including staging and mobilization) <del>at the Running Ridge Tank and OWS Wellfield sites</del>, all personnel associated with the <u>Project activities</u> <del>project construction at these sites</del> shall attend a Worker Environmental Awareness Program (WEAP) training, conducted by a qualified biologist, to aid workers in recognizing special status biological resources which may occur in the project site. This training shall include information about Crotch's bumblebee, special status reptiles (California</p> | <p>Prior to Project Initiation</p>                             | <p>Lead Agency/Qualified Biologist</p> |

<sup>7</sup> <https://wildlife.ca.gov/Licensing/Scientific-Collecting>

Julia Aranda  
 Casitas Municipal Water District  
 August 22, 2025  
 Page 19 of 23

| Mitigation Measure                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Timing                      | Responsible Party               |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|---------------------------------|
| <p>legless lizard, coast whiptail, and coast patch-nosed snake), nesting birds, and protected trees.</p> <p>The specifics of this program shall include identification of special status species and habitats, a description of the regulatory status and general ecological characteristics of special status resources, and review of the limits of construction and measures required to avoid and minimize impacts to biological resources within the work area. A fact sheet conveying this information shall also be prepared for distribution to all contractors, their employees, and other personnel involved with construction of the project. Employees shall sign a form provided by the trainer documenting they have attended the WEAP and understand the information presented to them. The crew foreman shall be responsible for ensuring crew members adhere to the guidelines and restrictions designed to avoid impacts to special status species.</p> |                             |                                 |
| <p><b>Mitigation Measure #5: Pre-Work Biological Surveys</b></p> <p>A qualified biologist shall conduct two pre-Project surveys within and adjacent to the proposed work area(s) within a one-week period prior to the start of Project-related activities. Pre-Project surveys shall include: a) general surveys for botanical and wildlife resources; b) the identification of any active bird nests, burrows, and/or woodrat nests (if active, they should be recorded, monitored for species observations, and mapped); and, c) work areas with flowing or standing water shall be visibly surveyed for any aquatic species that may be impacted by Project activities.</p>                                                                                                                                                                                                                                                                                           | Prior to Project Initiation | Lead Agency/Qualified Biologist |

Julia Aranda  
 Casitas Municipal Water District  
 August 22, 2025  
 Page 20 of 23

| Mitigation Measure                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Timing                                                         | Responsible Party                      |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------|----------------------------------------|
| <p><b>Mitigation Measure #6: Injured or Dead Wildlife</b></p> <p>If any special status wildlife species are found harmed/injured or dead, work in the immediate area shall stop immediately, the qualified biologist should be notified, and dead or injured wildlife documented immediately. A formal report should be sent to CDFW within 3 calendar days of the incident or finding. The report shall include the date, time of the finding or incident (if known), and location of the carcass or injured animal and circumstances of its death or injury (if known). 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.</p>                                                                                                                                                                                                                                                                                                                                                                                                              | <p>Prior to Project Initiation/During Project Construction</p> | <p>Lead Agency/Qualified Biologist</p> |
| <p><b>MM BIO-3: Nesting Bird Survey</b></p> <p>If construction must begin during the breeding season, then a pre-construction nesting bird survey shall be conducted no more than <b>seven days</b> prior to initiation of <u>Project activities</u> <del>ground disturbance and vegetation removal activities</del>. The nesting bird pre-construction survey shall be conducted on foot inside the project footprint, including a 100-foot buffer (300-foot for raptors), and in inaccessible areas (e.g., private lands) from afar using binoculars to the extent practicable. The survey shall be conducted by a <u>qualified</u> biologist familiar with the identification of avian species known to occur in southern California coastal communities. If nests are found, an avoidance buffer <u>with a minimum width of 100 feet (up to 300-500 feet for special-status species and 500 feet for raptors)</u> should be established around the nest <del>(dependent upon the species, the proposed work activity, and existing disturbances associated with land uses outside of the site)</del> shall be determined and demarcated by the <u>qualified</u> biologist</p> | <p>Prior to Project Initiation</p>                             | <p>Lead Agency/Qualified Biologist</p> |

Julia Aranda  
Casitas Municipal Water District  
August 22, 2025  
Page 21 of 23

| Mitigation Measure                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Timing                      | Responsible Party               |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|---------------------------------|
| <p>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 or <u>until the young are no longer dependent on the nest, which shall be determined by the qualified biologist</u>. No <del>Project ground-disturbing</del> activities shall occur inside this buffer until the avian biologist has confirmed breeding/nesting is completed, and the young have fledged the nest. <del>Encroachment into the buffer shall occur only at the discretion of the qualified biologist.</del> <u>A qualified biologist should be on site to monitor activity daily during vegetation clearing and grading.</u></p> |                             |                                 |
| <p><b>Recommendation #4: Compensatory Mitigation</b></p> <p>For impacts on oak woodlands, Casitas should offset the loss by no less than 3:1 of the total acreage of woodlands lost. This should include woodlands that would be subject to permanent fuel modification requirements. Casitas should restore functioning and self-sustaining woodlands of similar composition, structure, and function to woodlands impacted. Mitigation should include restoration of structurally diverse understory vegetation species (i.e., grass, forb, shrub, subshrub, vine) occurring in the impacted natural communities. Acorns and/or seedlings should originate from plants/trees of the same species (i.e., genus, species, subspecies, and variety) as the species impacted.</p>                                   | Prior to Project Initiation | Lead Agency/Qualified Biologist |
| <p><b>Recommendation #5: Woodland Restoration Plan</b></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Prior to Project Initiation | Lead Agency/Qualified Biologist |

Julia Aranda  
 Casitas Municipal Water District  
 August 22, 2025  
 Page 22 of 23

| Mitigation Measure                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Timing                             | Responsible Party                      |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------|----------------------------------------|
| <p>Prior to removing any oak trees or the understory vegetation, Casitas should prepare a Woodland Restoration Plan. The Woodland Restoration Plan should prescribe the following:</p> <ol style="list-style-type: none"> <li>1) Species-specific planting methods;</li> <li>2) Planting schedule;</li> <li>3) Measures to control exotic vegetation and protection from herbivory;</li> <li>4) Measurable goals and success criteria for establishing self-sustaining populations (e.g., percent survival rate, absolute cover). Measurable success criteria should be based onsite/habitat conditions prior to impact and/or functional local native oak shrublands/woodlands as reference sites;</li> <li>5) Contingency measures if the success criteria is not met;</li> <li>6) Long-term monitoring for at least 10 years;</li> <li>7) Adaptive management techniques, including replacement plants if necessary; and</li> <li>8) Annual reporting criteria and requirements.</li> </ol> |                                    |                                        |
| <p><b>Recommendation #6: Off-site Mitigation</b></p> <p>For off-site mitigation, to ensure permanent protection and effective long-term management of habitat, Casitas should protect mitigation lands in perpetuity under a conservation easement dedicated to a local land conservancy or other appropriate entity qualified and approved by CDFW to hold and manage mitigation lands. An appropriate non-wasting endowment should be provided for the long-term management of mitigation lands. A conservation easement and endowment funds should be fully acquired, established, transferred, or</p>                                                                                                                                                                                                                                                                                                                                                                                      | <p>Prior to Project Initiation</p> | <p>Lead Agency/Qualified Biologist</p> |

Julia Aranda  
Casitas Municipal Water District  
August 22, 2025  
Page 23 of 23

| Mitigation Measure                                                                   | Timing | Responsible Party |
|--------------------------------------------------------------------------------------|--------|-------------------|
| otherwise executed prior to any ground-disturbing activities and vegetation removal. |        |                   |

## Letter 6

**COMMENTER:** Heather Pert, California Department of Fish and Wildlife (CDFW)

**DATE:** August 22, 2025

### Response 6.1

The commenter acknowledges receipt and review of the Draft IS-MND and expresses appreciation for the opportunity to provide comments and recommendations regarding project activities which may affect California fish and wildlife. The commenter also notes CDFW may have regulatory authority over certain aspects of the project under the Fish and Game Code. This comment does not warrant changes to the Draft IS-MND.

### Response 6.2

The commenter identifies CDFW as a Trustee Agency under CEQA, with jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and their habitats. The commenter also notes CDFW may act as a Responsible Agency under CEQA and may exercise regulatory authority under the Fish and Game Code. Casitas acknowledges CDFW's trustee and regulatory roles and would coordinate with CDFW as needed to obtain any required permits or authorizations prior to construction. This comment does not warrant changes to the Draft IS-MND.

### Response 6.3

The commenter provides a summary of the project proponent, objective, location, time frame, and biological setting. This comment does not warrant changes to the Draft IS-MND.

### Response 6.4

The commenter identifies potential impacts to Crotch's bumble bee, a candidate species under the California Endangered Species Act (CESA), and recommends the Draft IS-MND include focused surveys and mitigation sufficient to support future Incidental Take Permit (ITP) issuance.

Item (a) in Environmental Checklist Section 4, *Biological Resources*, of the Draft IS-MND acknowledges the presence of suitable habitat elements for Crotch's bumble bee near the OWS Wellfield and Running Ridge Tank sites, specifically noting California buckwheat and scrub vegetation within a 50-foot buffer of the project footprint. No ground disturbance is proposed at the Running Ridge site, and no suitable habitat for the species would be impacted at the OWS Wellfield site. Therefore, the project would not result in temporary or permanent loss of suitable nesting and foraging habitat for Crotch's bumble bee and direct impacts are not expected. However, the Draft IS-MND recognizes a low potential for indirect impacts at the Running Ridge site due to worker presence and includes Mitigation Measure BIO-1 (Worker Environmental Awareness Program) to reduce inadvertent harm. Mitigation Measure BIO-1 would require training for all personnel working at these sites to identify and avoid impacts to special-status species, including Crotch's bumble bee. The inclusion of Mitigation Measure BIO-1 is intended to minimize the potential for transit-related indirect impacts and support compliance with CEQA Guidelines Section 15380 and CESA. Thus, the IS-MND provides sufficient analysis and mitigation regarding potential impacts to Crotch's bumble bee, and no changes to the Draft IS-MND are warranted.

## Response 6.5

The commenter identifies potential impacts to western burrowing owl, a candidate species under the CESA, and recommends focused evaluation of suitable habitat and incorporation of avoidance and minimization measures.

As informed by the Biological Resources Assessment (Appendix B), the Draft IS-MND does not identify western burrowing owl as a species with potential to occur within the project site, based on habitat conditions and available data. Specifically, suitable habitat for western burrowing owl, which is defined as open, dry, annual and perennial grasslands, deserts, and scrublands with low-growing vegetation, is not present within or near the project site. The project footprint is generally located within disturbed areas, including existing water system facilities and residential parcels, which do not support the open terrain or burrow systems typically associated with this species.

Additionally, a review of the California Natural Diversity Database conducted as part of the Biological Resources Assessment indicates there are no known occurrences of western burrowing owl within 5 miles of the project site. Based on the absence of suitable habitat and known occurrences, the Draft IS-MND concludes the western burrowing owl is not expected to occur within the project area, and no impacts to the species are anticipated. Therefore, focused surveys or mitigation measures specific to western burrowing owl are not warranted. Casitas would continue to coordinate with CDFW should new information become available. No changes to the Draft IS-MND are warranted.

## Response 6.6

The commenter identifies potential impacts to California Species of Special Concern (SSC), including California legless lizard, coastal whiptail, and coast patch-nosed snake, and recommends focused surveys and mitigation measures to avoid or minimize harm.

Item (a) in Environmental Checklist Section 4, *Biological Resources*, of Draft IS-MND acknowledges suitable habitat for these SSC reptiles is present in scrub vegetation surrounding the Running Ridge Tank site, and these species have moderate potential to occur. While no ground disturbance is proposed at Running Ridge, Casitas agrees to clarify and strengthen the mitigation framework to increase protection of SSC species. To address CDFW's recommendation regarding the Worker Environmental Awareness Program, Casitas has revised Mitigation Measure BIO-1 to incorporate CDFW's suggested content.

Revisions to Mitigation Measure BIO-1 are shown below, with additions in underline and deletions in ~~striketrough~~.

Prior to initiation of ~~construction project~~ activities (including staging and mobilization) ~~at the Running Ridge Tank and OWS Wellfield sites~~, all personnel associated with project activities ~~project construction at these sites~~ shall attend a Worker Environmental Awareness Program (WEAP) training, conducted by a qualified biologist, to aid workers in recognizing special status biological resources which may occur in the project site. This training shall include information about Crotch's bumblebee, special status reptiles (California legless lizard, coast whiptail, and coast patch-nosed snake), nesting birds, and protected trees.

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

conveying this information shall also be prepared for distribution to all contractors, their employees, and other personnel involved with construction of the project. Employees shall sign a form provided by the trainer documenting they have attended the WEAP and understand the information presented to them. The crew foreman shall be responsible for ensuring crew members adhere to the guidelines and restrictions designed to avoid impacts to special status species.

To address CDFW's recommendation regarding a pre-activity biological survey, the following measure will be incorporated for the Running Ridge Tank site as a new Mitigation Measure BIO-2:

Within one week prior to the commencement of project activities at the Running Ridge site, a qualified wildlife biologist shall conduct a pre-activity survey in portions of the access and project area at the Running Ridge site containing potentially suitable scrub vegetation for California legless lizard, coastal whiptail, and coast patch-nosed snake. A 50-foot buffer around the Running Ridge site will be surveyed, with inaccessible areas (i.e., private lands) surveyed with binoculars, as practicable. The biologist will document existing conditions and search for California legless lizard, coastal whiptail, and coast patch-nosed snake. If California legless lizard, coastal whiptail, or coast patch-nosed snake are found, and could potentially be impacted by project activities at the Running Ridge site (e.g., trampling), individual animals shall be relocated to similar habitat away at least 100 feet away from project activities. The findings of the pre-activity survey will be provided to Casitas in a summary report prior to implementation of project activities.

Additionally, Casitas will incorporate CDFW's recommended Mitigation Measure #6 (Injured or Dead Wildlife) into the Draft IS-MND. This mitigation measure has been revised to be specific to the Running Ridge site, where suitable habitat for these SSC reptiles occurs. The new Mitigation Measure BIO-3 would consist of the following:

If any special-status wildlife species are found harmed/injured or dead at the Running Ridge Tank Site, the qualified biologist should be notified, and dead or injured wildlife documented immediately. A formal report shall be sent to Casitas within three calendar days of the incident or finding. The report shall include the date, time of the finding or incident (if known), and located of the carcass or injured animal and circumstances of its death or injury (if known).

## **Response 6.7**

The commenter recommends strengthening Mitigation Measure BIO-5 (Nesting Bird Survey) to avoid and minimize impacts to nesting birds, including raptors and special-status species, during construction activities. Mitigation Measure BIO-5 (Nesting Bird Survey) would apply to the entire project site, and not only the Running Ridge and OWS Wellfield sites.

To address CDFW's recommendation, Casitas has revised Mitigation Measure BIO-5 (Nesting Bird Survey) to incorporate CDFW's suggested content. Revisions to Mitigation Measure BIO-5 are shown below, with additions in underline and deletions in ~~striketrough~~.

If construction must begin during the breeding season, then a pre-construction nesting bird survey shall be conducted no more than five ~~seven~~ days prior to initiation of project activities ~~ground disturbance and vegetation removal activities~~. The nesting bird pre-construction survey shall be conducted on foot inside the project footprint, including a 100-foot buffer (300-foot for raptors), and in inaccessible areas (e.g., private lands) from afar

using binoculars to the extent practicable. The survey shall be conducted by a qualified biologist familiar with the identification of avian species known to occur in southern California coastal communities. If nests are found, an avoidance buffer (e.g., 50 feet for common species, 300 to 500 feet for special-status species, and 500 feet for raptors) (dependent upon the species, the proposed work activity, and existing disturbances associated with land uses outside of the site) shall be determined and demarcated at the discretion of the qualified biologist with bright orange construction fencing, flagging, construction tape, 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 or until the young are no longer dependent on the nest, as determined by the qualified biologist. No project ground-disturbing activities shall occur inside this buffer until the avian biologist has confirmed breeding/nesting is completed, and the young have fledged and are no longer dependent on the nest. Encroachment into the buffer shall occur only at the discretion of the qualified biologist during monitoring and with confirmation that nesting is not adversely affected by project activities.

## **Response 6.8**

The commenter raises concerns regarding potential impacts to oak woodland and recommends consideration of restoration or long-term management measures. The Draft IS-MND acknowledges the presence of coast live oak woodland within a 50-foot buffer of the Ojai East Tank site but confirms no ground disturbance is proposed within this area.

The overall project footprint is generally limited to previously disturbed areas, including existing water infrastructure sites and residential parcels. Impacts to individual protected trees are expected to be very limited but may include construction equipment compacting soil around the trees as well as disturbance of the crown and the root zone from trenching, grading, and clearance pruning. The proposed project would comply with the tree ordinance guidelines of the County of Ventura or City of Ojai prior to the start of any tree-disturbing construction activities, as necessary. As such, the project would not result in a significant impact on oak woodland communities or individual protected trees under CEQA. No changes to the Draft IS-MND are warranted.

## **Response 6.9**

The commenter recommends the environmental document include the mitigation measures recommended in the comment letter. Where relevant, the mitigation language provided has been integrated into the Final IS-MND as well as a comprehensive Mitigation Monitoring and Reporting Plan (MMRP) prepared in accordance with CEQA Guidelines Section 15097 and Public Resources Code Section 21081.6. Each measure is assigned a responsible party (e.g., Casitas, construction contractor, qualified biologist), a specific implementation timeframe (e.g., prior to project activities, during construction, post-construction), and performance standards to increase enforceability. The MMRP also reflects revisions made in response to CDFW's comments.

## **Response 6.10**

The commenter notes CEQA requires environmental data developed during the review process to be incorporated into databases which support future environmental determinations, and requests any special-status species and natural communities detected during project surveys be submitted to the California Natural Diversity Database (CNDDDB) and the Vegetation Classification and Mapping Program. Casitas acknowledges this requirement and will provide relevant biological data collected

for the Draft IS-MND to the appropriate databases in accordance with CEQA Guidelines and CDFW recommendations. This comment does not warrant changes to the Draft IS-MND.

### **Response 6.11**

The commenter notes the project would have an impact on fish and/or wildlife and payment of environmental document filing fees is required under CEQA to support CDFW's environmental review efforts. Casitas acknowledges this requirement and will pay the appropriate filing fees upon submittal of the Notice of Determination, in accordance with California Code of Regulations, Title 14, Section 753.5, Fish and Game Code Section 711.4, and Public Resources Code Section 21089. This comment does not warrant changes to the Draft IS-MND.

### **Response 6.12**

The commenter expresses appreciation for the opportunity to comment on the Draft IS-MND and requests notification of any forthcoming hearing dates and an opportunity to review and comment on Casitas' responses to CDFW's comments, pursuant to CEQA Guidelines Section 15073(e). Casitas will provide responses to CDFW's comments for review. This comment does not warrant changes to the Draft IS-MND.

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## **4 Mitigation Monitoring and Reporting Program**

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CEQA requires a reporting or monitoring program be adopted for the conditions of project approval which are necessary to mitigate or avoid significant effects on the environment (Public Resources Code Section 21081.6). This mitigation monitoring and reporting program is intended to track and ensure compliance with adopted mitigation measures during the project implementation phase. For each mitigation measure recommended in the Final Initial Study-Mitigated Negative Declaration (Final IS-MND), specifications are made herein that identify the action required, the monitoring that must occur, and the agency or department responsible for oversight.

Casitas Municipal Water District  
**Casitas-Ojai Water System Consolidation Project**

| Mitigation Measure/<br>Condition of Approval                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Action Required                                                                                                                                                                  | Timing                                                       | Monitoring Requirements | Com-<br>pliance<br>Verifi-<br>cation<br>Initial | Com-<br>pliance<br>Verifi-<br>cation<br>Date | Com-<br>pliance<br>Verifi-<br>cation<br>Comments |
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| <b>Air Quality</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                  |                                                              |                         |                                                 |                                              |                                                  |
| <b>AQ-1. VCAPCD Construction Mitigation Measures</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                  |                                                              |                         |                                                 |                                              |                                                  |
| The following shall be implemented during construction to minimize emissions of ozone precursors.                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Casitas to include these measures within the construction contract and on construction specifications.                                                                           | Prior to issuance of construction permits                    | Once                    |                                                 |                                              |                                                  |
| 1. Minimize equipment idling time.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                  |                                                              |                         |                                                 |                                              |                                                  |
| 2. Maintain equipment engines in good condition and in proper tune as per manufacturers' specifications.                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                  | Prior to construction                                        | Once                    |                                                 |                                              |                                                  |
| 3. Lengthen the construction period during smog season (May through October), to minimize the number of vehicles and equipment operating at the same time.                                                                                                                                                                                                                                                                                                                                                                                                 | Prior to construction, Casitas to confirm with the construction contractor the fuel used for construction equipment and the construction equipment is in good working condition. |                                                              |                         |                                                 |                                              |                                                  |
| 4. Use alternatively fueled construction equipment, such as compressed natural gas, liquefied natural gas, or electric, if feasible.                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                  |                                                              |                         |                                                 |                                              |                                                  |
| <b>Biological Resources</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                  |                                                              |                         |                                                 |                                              |                                                  |
| <b>BIO-1. Worker Environmental Awareness Program</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                  |                                                              |                         |                                                 |                                              |                                                  |
| Prior to initiation of project activities (including staging and mobilization), all personnel 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 which may occur in the project site. This training shall include information about Crotch's bumblebee, special status reptiles (California legless lizard, coast whiptail, and coast patch-nosed snake), nesting birds, and protected trees. | Casitas to retain a qualified biologist to conduct a WEAP training. Ensure all employees working at the project site participate in the program.                                 | Prior to and during construction, if new personnel are added | Once and as needed      |                                                 |                                              |                                                  |
| The specifics of this program shall include identification of special status species and habitats, a description of the regulatory status and general ecological characteristics of special status resources, and review of the limits of construction and measures required to avoid and minimize impacts to biological resources within the work area. A fact sheet conveying this information shall also be prepared for distribution to all contractors, their                                                                                         | Construction contractor to ensure guidelines are followed during construction.                                                                                                   | During construction                                          | Ongoing                 |                                                 |                                              |                                                  |

| Mitigation Measure/<br>Condition of Approval                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Action Required                                                                                                                                               | Timing                                                                     | Monitoring Requirements | Com-<br>pliance<br>Verifi-<br>cation<br>Initial | Com-<br>pliance<br>Verifi-<br>cation<br>Date | Com-<br>pliance<br>Verifi-<br>cation<br>Comments |
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| employees, and other personnel involved with construction of the project. Employees shall sign a form provided by the trainer documenting they have attended the WEAP and understand the information presented to them. The crew foreman shall be responsible for ensuring crew members adhere to the guidelines and restrictions designed to avoid impacts to special status species.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                               |                                                                            |                         |                                                 |                                              |                                                  |
| <b>BIO-2. Pre-Activity Surveys for Special-Status Reptiles</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                               |                                                                            |                         |                                                 |                                              |                                                  |
| Within one week prior to the commencement of project activities at the Running Ridge site, a qualified wildlife biologist shall conduct a pre-activity survey in portions of the access and project area at the Running Ridge site containing potentially suitable scrub vegetation for California legless lizard, coastal whiptail, and coast patch-nosed snake. A 50-foot buffer around the Running Ridge site will be surveyed, with inaccessible areas (i.e., private lands) surveyed with binoculars, as practicable. The biologist will document existing conditions and search for California legless lizard, coastal whiptail, and coast patch-nosed snake. If California legless lizard, coastal whiptail, or coast patch-nosed snake are found, and could potentially be impacted by project activities at the Running Ridge site (e.g., trampling), individual animals shall be relocated to similar habitat away at least 100 feet away from project activities. The findings of the pre-activity survey will be provided to Casitas in a summary report prior to implementation of project activities. | Qualified biologist to conduct pre-activity survey at Running Ridge site.                                                                                     | One week prior to commencement of project activities at Running Ridge site | Once                    |                                                 |                                              |                                                  |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Qualified biologist to provide findings of the pre-activity survey to Casitas.                                                                                | Following completion of pre-activity survey                                | Once                    |                                                 |                                              |                                                  |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Qualified biologist to relocate special-status reptile species to similar habitat, if needed.                                                                 | As needed                                                                  | As needed               |                                                 |                                              |                                                  |
| <b>BIO-3. Injured or Dead Wildlife</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                               |                                                                            |                         |                                                 |                                              |                                                  |
| If any special-status wildlife species are found harmed/injured or dead at the Running Ridge Tank Site, the qualified biologist should be notified, and dead or injured wildlife documented immediately. A formal report shall be sent to Casitas within three calendar days of the incident or finding. The report shall include the date, time of the finding or incident (if known), and                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Construction contractor to notify qualified biologist if any special-status wildlife species are found harmed/injured or dead at the Running Ridge Tank Site. | As needed during construction                                              | As needed               |                                                 |                                              |                                                  |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Qualified biologist to document dead or injured wildlife.                                                                                                     | As needed during construction                                              | As needed               |                                                 |                                              |                                                  |

Casitas Municipal Water District  
**Casitas-Ojai Water System Consolidation Project**

| Mitigation Measure/<br>Condition of Approval                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Action Required                                                                                                                                                                                                | Timing                                                                                                                                                                 | Monitoring Requirements | Com-<br>pliance<br>Verifi-<br>cation<br>Initial | Com-<br>pliance<br>Verifi-<br>cation<br>Date | Com-<br>pliance<br>Verifi-<br>cation<br>Comments |
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| located of the carcass or injured animal and circumstances of its death or injury (if known).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Qualified biologist to send report, including date, time of the finding or incident (if known), and location of the carcass or injured animal and circumstances of its death or injury (if known), to Casitas. | Within three calendar days of the incident or finding                                                                                                                  | As needed               |                                                 |                                              |                                                  |
| <b>BIO-4. Nesting Bird Season Avoidance</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                |                                                                                                                                                                        |                         |                                                 |                                              |                                                  |
| To avoid disturbance of nesting and special status birds, including raptor species protected by the Migratory Bird Treaty Act and California Fish and Game Code Section 3503, activities related to the project including, but not limited to, vegetation removal, ground disturbance, and construction and demolition shall occur outside of the bird breeding season for migratory birds (February 1 through August 31), if practicable.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | If practicable, avoid construction activities including, but not limited to, vegetation removal, ground disturbance, and construction and demolition between February 1 and August 31.                         | During construction                                                                                                                                                    | Ongoing                 |                                                 |                                              |                                                  |
| <b>BIO-5. Nesting Bird Survey</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                |                                                                                                                                                                        |                         |                                                 |                                              |                                                  |
| If construction must begin during the breeding season, then a pre-construction nesting bird survey shall be conducted no more than five days prior to initiation of project activities. The nesting bird pre-construction survey shall be conducted on foot inside the project footprint, including a 100-foot buffer (300-foot for raptors), and in inaccessible areas (e.g., private lands) from afar using binoculars to the extent practicable. The survey shall be conducted by a qualified biologist familiar with the identification of avian species known to occur in southern California coastal communities. If nests are found, an avoidance buffer (e.g., 50 feet for common species, 300 to 500 feet for special-status species, and 500 feet for raptors) shall be determined and demarcated at the discretion of the qualified biologist with bright orange construction fencing, flagging, 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 | For construction that occurs during the nesting bird season, retain a qualified biologist to conduct pre-construction nesting bird surveys.                                                                    | Seven days prior to initial ground disturbance and/or vegetation removal, or reinitiation of construction following a one-week lapse, between February 1 and August 31 | Once and as needed      |                                                 |                                              |                                                  |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Establish avoidance buffers (and/or noise reduction measures), as needed, until a qualified biologist has determined that all young have fledged.                                                              | During construction activities, if nests are identified                                                                                                                | As needed               |                                                 |                                              |                                                  |

| Mitigation Measure/<br>Condition of Approval                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Action Required                                                                                      | Timing                                      | Monitoring Requirements | Com-<br>pliance<br>Verifi-<br>cation<br>Initial | Com-<br>pliance<br>Verifi-<br>cation<br>Date | Com-<br>pliance<br>Verifi-<br>cation<br>Comments |
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| or until the young are no longer dependent on the nest, as determined by the qualified biologist. No project activities shall occur inside this buffer until the avian biologist has confirmed breeding/nesting is completed, and the young have fledged and are no longer dependent on the nest. Encroachment into the buffer shall occur only at the discretion of the qualified biologist during monitoring and with confirmation that nesting is not adversely affected by project activities.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                      |                                             |                         |                                                 |                                              |                                                  |
| <b>BIO-6. Jurisdictional Waters Avoidance and Minimization</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                      |                                             |                         |                                                 |                                              |                                                  |
| The construction contractor(s) shall implement the following best management practices during work at the OWS Wellfield site:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Casitas to include these measures in construction specifications.                                    | Prior to issuance of construction contracts | Once                    |                                                 |                                              |                                                  |
| <ul style="list-style-type: none"> <li>• Areas of temporary disturbance shall be minimized to the extent practicable.</li> <li>• Staging and laydown areas shall occur in unvegetated areas and previously disturbed sites only.</li> <li>• All vehicles and equipment shall be in good working condition and free of leaks to avoid or minimize the risk of oil, petroleum products, or any other pollutant from contaminating the soil or entering a watercourse (dry or otherwise). When vehicles or equipment are stationary, mats or drip pans shall be placed below vehicles to contain fluid leaks.</li> <li>• Materials shall be stored on impervious surfaces or plastic ground covers to avoid or minimize effects of any spills or leakage. Material storage shall be at least 100 feet from San Antonio Creek. Any material/spoils from project activities shall be located and stored 100 feet from San Antonio Creek. Construction materials and spoils shall be protected from stormwater run-off using temporary perimeter</li> </ul> | Construction contractor to ensure these measures are implemented throughout the construction period. | Throughout construction                     | Ongoing                 |                                                 |                                              |                                                  |

Casitas Municipal Water District  
**Casitas-Ojai Water System Consolidation Project**

| Mitigation Measure/<br>Condition of Approval                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Action Required                                                  | Timing                                      | Monitoring Requirements | Com-<br>pliance<br>Verifi-<br>cation<br>Initial | Com-<br>pliance<br>Verifi-<br>cation<br>Date | Com-<br>pliance<br>Verifi-<br>cation<br>Comments |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------|---------------------------------------------|-------------------------|-------------------------------------------------|----------------------------------------------|--------------------------------------------------|
| <p>sediment barriers such as berms, silt fences, fiber rolls, covers, sand/gravel bags, and straw bale barriers, as appropriate.</p> <ul style="list-style-type: none"> <li>The construction contractor(s) shall provide street sweeping, vacuuming, and rumble plates, as appropriate, to avoid or minimize the off-site tracking of loose construction and landscape materials.</li> <li>Avoid or minimize the discharge of silt or pollutants off the site when working adjacent to San Antonio Creek by installing BMPs (e.g., silt barriers, sand bags, straw bales) as appropriate.</li> <li>All food related trash shall be disposed of 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 project footprint.</li> <li>All re-fueling, cleaning, and maintenance of equipment shall occur at least 100-feet from San Antonio Creek.</li> <li>Any spillage of material shall be stopped if it can be done safely. The contaminated area shall be cleaned, and any contaminated materials properly disposed. For all spills, the project foreman or other designated liaison shall notify Casitas immediately.</li> </ul> |                                                                  |                                             |                         |                                                 |                                              |                                                  |
| <b>BIO-7. Arborist Study</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                  |                                             |                         |                                                 |                                              |                                                  |
| An Arborist Study shall be completed for any protected trees occurring within or adjacent to (with any portion of the crown overhanging) the project footprint required by the County or the City. The study shall determine the                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Casitas to retain an arborist or related qualified professional. | Prior to issuance of construction contracts | Once                    |                                                 |                                              |                                                  |

| Mitigation Measure/<br>Condition of Approval                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Action Required                                                                                                                                                                                 | Timing                                      | Monitoring Requirements | Com-<br>pliance<br>Verifi-<br>cation<br>Initial | Com-<br>pliance<br>Verifi-<br>cation<br>Date | Com-<br>pliance<br>Verifi-<br>cation<br>Comments |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------|-------------------------|-------------------------------------------------|----------------------------------------------|--------------------------------------------------|
| jurisdiction of any trees to be impacted or protected in place. An Arborist Report shall be prepared by a Certified Arborist in compliance with both the City of Ojai and County of Ventura ordinance guidelines. Specifically, the Arborist Report shall include, at minimum: <ul style="list-style-type: none"> <li>An inventory of all trees that are within or adjacent to (with any portion of the crown overhanging) the project footprint, as feasible without trespassing on private lands. Inventory data shall record, at minimum: trunk location, species, diameter at standard height (DBH), height, dripline, mapping, and health and vigor rating.</li> <li>Representative photographs of each regulated tree that may be impacted.</li> <li>Description of proposed site development activities including, but not limited to, excavation for trenching, any tree trimming for access, and construction access routes.</li> <li>A project-specific Tree Protection Plan (TPP) shall be prepared which would at a minimum include site plans, protective tree fencing, the designated tree protection zone (identifying an area sufficiently large enough to protect the tree and its roots from disturbance), activities prohibited/permitted within the tree protective zone, encroachment boundaries, and potential requirements for transplanting or replacement tree plantings.</li> </ul> <p>The Arborist Report shall be completed consistent with the tree ordinance guidelines of the County of Ventura or City of Ojai prior to the start of any tree-disturbing construction activities, as necessary.</p> | Arborist or related qualified professional to prepare an Arborist Report that contains tree protection measures during construction and mitigation for protected trees impacted by the project. | Prior to issuance of construction contracts | Once                    |                                                 |                                              |                                                  |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Casitas and/or construction contractor to implement recommendations of Arborist Report.                                                                                                         | During and after construction               | As needed               |                                                 |                                              |                                                  |
| <b>CUL-1. Unanticipated Discovery of Cultural Resources</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                 |                                             |                         |                                                 |                                              |                                                  |
| In the event of the unanticipated discovery of archaeological materials, the construction contractor                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | If archaeological resources are encountered during construction,                                                                                                                                | During construction, as needed              | As needed               |                                                 |                                              |                                                  |

Casitas Municipal Water District  
**Casitas-Ojai Water System Consolidation Project**

| Mitigation Measure/<br>Condition of Approval                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Action Required                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Timing                                                               | Monitoring Requirements    | Com-<br>pliance<br>Verifi-<br>cation<br>Initial | Com-<br>pliance<br>Verifi-<br>cation<br>Date | Com-<br>pliance<br>Verifi-<br>cation<br>Comments |
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| shall immediately cease all work activities in the area (within approximately 100 feet) of the discovery until it can be evaluated by an archaeologist who meets the Secretary of the Interior's Professional Qualification Standards (qualified archaeologist). Prehistoric archaeological materials might include obsidian and chert flaked-stone tools (e.g., projectile points, knives, scrapers) or toolmaking debris; culturally darkened soil ("midden") containing heat-affected rocks, artifacts, or shellfish remains; stone milling equipment (e.g., mortars, pestles, handstones, or milling slabs); and battered stone tools, such as hammerstones and pitted stones. Historic-period materials might include stone or concrete footings and walls; filled wells or privies; and deposits of metal, glass, and/or ceramic refuse. Construction should not resume until the qualified archaeologist has conferred with Casitas on the significance of the resource.<br><br>If it is determined the discovered archaeological resource constitutes a historical resource or unique archaeological resource under CEQA, avoidance and preservation in place is the preferred manner of mitigation. Preservation in place maintains the important relationship between artifacts and their archaeological context and also serves to avoid conflict with traditional and religious values of groups who may ascribe meaning to the resource. Preservation in place may be accomplished by, but is not limited to, avoidance, incorporating the resource into open space, capping, or deeding the site into a permanent conservation easement. In the event preservation in place is demonstrated to be infeasible and data recovery through excavation is the only feasible mitigation available, an Archaeological Resources Data Recovery and Treatment Plan shall be prepared and implemented by the qualified archaeologist in consultation with Casitas. The Archaeological Resources Data Recovery and Treatment Plan shall provide for the adequate recovery of the scientifically consequential information contained in the archaeological resource. | Casitas to retain an archaeologist meeting the Secretary of Interior's Professional Qualifications Standards for archaeology to evaluate the unanticipated find(s).<br><br>Construction contractor to cease all work activities in the area of the discovery until Casitas and the qualified archaeologist determine the next steps.<br><br>If the find is determined to be Native American in origin, Casitas and qualified archaeologist to contact an appropriate Native American monitor to participate in the evaluation of the resource and determine the appropriate treatment. | During construction, as needed<br><br>During construction, as needed | As needed<br><br>As needed |                                                 |                                              |                                                  |

| Mitigation Measure/<br>Condition of Approval                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Action Required                                                                                                                                                                                                  | Timing                                                         | Monitoring Requirements | Com-<br>pliance<br>Verifi-<br>cation<br>Initial | Com-<br>pliance<br>Verifi-<br>cation<br>Date | Com-<br>pliance<br>Verifi-<br>cation<br>Comments |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------|-------------------------|-------------------------------------------------|----------------------------------------------|--------------------------------------------------|
| The qualified archaeologist and Casitas shall consult with appropriate Native American representatives in determining treatment for prehistoric or Native American resources to ensure cultural values ascribed to the resource, beyond those of scientific importance, are considered.                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                  |                                                                |                         |                                                 |                                              |                                                  |
| <b>GEO-1. Unanticipated Fossil Discovery</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                  |                                                                |                         |                                                 |                                              |                                                  |
| Casitas shall include a standard inadvertent discovery clause in every construction contract to inform contractors of this requirement. If a potential fossil is discovered during project construction, construction activity within 50 feet of the find shall cease until the discovery is examined by a Qualified Professional Paleontologist. If the find is determined to be significant, the Qualified Professional Paleontologist shall direct all mitigation efforts related to paleontological resources consistent with the SVP (2010) standards, which may include, but are not limited to: paleontological monitoring; fossil salvage, preparation, and curation; and reporting to summarize the paleontological mitigation efforts. | Casitas to include an inadvertent discovery clause in all construction contracts.                                                                                                                                | Prior to issuance of construction contracts                    | Once                    |                                                 |                                              |                                                  |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | If a potential fossil is discovered during construction, Casitas to retain a Qualified Professional Paleontologist to evaluate the unanticipated find(s).                                                        | During construction, as needed                                 | As needed               |                                                 |                                              |                                                  |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | If the fossil is determined to be significant, paleontologist to oversee mitigation in accordance with SVP (2010) standards, which may include monitoring, fossil salvage, preparation, curation, and reporting. | During construction, as needed                                 | As needed               |                                                 |                                              |                                                  |
| <b>NOI-1. Groundborne Vibration Reduction</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                  |                                                                |                         |                                                 |                                              |                                                  |
| To reduce vibration levels generated at structures on contiguous parcels to the Private Drive and Foothill Road sites, the following measure shall be implemented during construction of the Private Drive and Foothill Road pipelines:<br><ul style="list-style-type: none"> <li>Construction activities using a roller shall be conducted with a static or pneumatic roller in lieu of a vibratory roller.</li> </ul> This measure shall be shown within the construction contract for the project and reviewed by the construction contractor prior to the start of construction. Casitas shall                                                                                                                                               | Casitas to include the vibration mitigation requirement in the construction contract.                                                                                                                            | Prior to issuance of construction contracts                    | Once                    |                                                 |                                              |                                                  |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Construction contractor to review and acknowledge this requirement prior to the start of construction.                                                                                                           | Prior to construction activities                               | Once                    |                                                 |                                              |                                                  |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Casitas to check the construction equipment at the Private Drive and Foothill Road sites to verify the                                                                                                           | Prior to paving and excavation activities at the Private Drive | Once                    |                                                 |                                              |                                                  |

Casitas Municipal Water District  
**Casitas-Ojai Water System Consolidation Project**

| Mitigation Measure/<br>Condition of Approval                                                                                                                                                                                                                                    | Action Required                                                                                         | Timing                  | Monitoring Requirements | Com-<br>pliance<br>Verifi-<br>cation<br>Initial | Com-<br>pliance<br>Verifi-<br>cation<br>Date | Com-<br>pliance<br>Verifi-<br>cation<br>Comments |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------|-------------------------|-------------------------|-------------------------------------------------|----------------------------------------------|--------------------------------------------------|
| verify the construction contractor has implemented this requirement prior to the start of excavation activities and prior to the start of paving activities at the Private Drive and Foothill Road sites by confirming the construction equipment meets the above requirements. | construction contractor is only using static or pneumatic rollers for excavation and paving activities. | and Foothill Road sites |                         |                                                 |                                              |                                                  |



**Casitas Municipal Water District**  
**State Water Project - Interconnect Project Costs**  
**As of 8/31/25**

| Project No:              | Project Name:                                     | Costs paid to date | Encumbered | Total Encumbered &<br>Cost To Date | Grant Revenue<br>Received To Date |
|--------------------------|---------------------------------------------------|--------------------|------------|------------------------------------|-----------------------------------|
| 378                      | State Water Interconnect - Calleguas to Casitas   | 123,668            | -          | 123,668                            | -                                 |
| 527                      | State Water Interconnect - Carpinteria to Casitas | 4,479,556          | 307,254    | 4,786,810                          | 520,850                           |
| 606                      | State Water Interconnect - Ventura to Casitas     | 249,242            | -          | 249,242                            | -                                 |
| Project(s) Cost To Date: |                                                   | 4,852,466          | 307,254    | 5,159,720                          | 520,850                           |

**CASITAS MUNICIPAL WATER DISTRICT  
TREASURER'S MONTHLY REPORT OF INVESTMENTS  
08/31/25**

| 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     | \$860,804         | 4.500%           | 6/18/2024       | 7.86%          | 620              |
| *TB                                                      | Federal Home Loan Bank                | 912797RF6 | 7/9/2026         | \$962,133     | \$967,940         | 4.080%           | 5/10/2017       | 8.84%          | 309              |
| *TB                                                      | US Treasury Note                      | 91282CMH1 | 1/31/2027        | \$723,188     | \$728,596         | 4.125%           | 2/21/2025       | 6.65%          | 510              |
| *TB                                                      | Farmer MAC                            | 31315PYF0 | 5/2/2028         | \$512,355     | \$490,465         | 2.925%           | 11/20/2017      | 4.48%          | 962              |
| *TB                                                      | Federal Farm CR Bank                  | 31331VWN2 | 4/13/2026        | \$940,311     | \$720,913         | 5.400%           | 5/9/2016        | 6.58%          | 223              |
| *TB                                                      | Farmer MAC                            | 3133EEPH7 | 2/12/2029        | \$480,251     | \$462,671         | 2.710%           | 11/20/2017      | 4.23%          | 1242             |
| *TB                                                      | Federal National Assn                 | 3135G0K36 | 4/24/2026        | \$2,532,940   | \$2,470,475       | 2.125%           | 7/6/2010        | 22.56%         | 234              |
| *TB                                                      | US Treasury Note                      | 912797RG4 | 8/6/2026         | \$2,020,753   | \$2,027,256       | 3.780%           | 9/4/2024        | 18.51%         | 336              |
| *TB                                                      | US Treasury Note                      | 91282CLS8 | 10/31/2026       | \$728,888     | \$732,336         | 4.125%           | 11/1/2024       | 6.69%          | 420              |
| *TB                                                      | US Treasury Note                      | 9128286F2 | 2/28/2026        | \$1,471,347   | \$1,488,645       | 2.540%           | 9/9/2024        | 13.59%         | 178              |
| Total in Gov't Sec. (11-00-1055-00&1065)                 |                                       |           |                  | \$11,220,695  | \$10,950,100      |                  |                 | 99.96%         |                  |
| Total Certificates of Deposit:                           |                                       |           |                  | \$0           | \$0               |                  |                 | 0.00%          |                  |
| **                                                       | LAIF as of 8/31/2025: (11-00-1050-00) |           | N/A              | \$534         | \$534             | 4.40%            | Estimated       | 0.00%          |                  |
| ***                                                      | COVI as of 8/31/2025: (11-00-1060-00) |           | N/A              | \$3,350       | \$3,350           | 3.59%            | Estimated       | 0.03%          |                  |
| TOTAL FUNDS INVESTED                                     |                                       |           |                  | \$11,224,579  | \$10,953,984      |                  |                 | 100.00%        |                  |
| Total Funds Invested last report                         |                                       |           |                  | \$11,249,971  | \$10,988,657      |                  |                 |                |                  |
| Total Funds Invested 1 Yr. Ago                           |                                       |           |                  | \$9,270,472   | \$8,793,900       |                  |                 |                |                  |
| ****                                                     | CASH IN BANK (11-00-1000-00) EST.     |           |                  | \$7,824,218   | \$7,824,218       |                  |                 |                |                  |
| CASH IN Custody Money Market                             |                                       |           |                  | \$131,003     | \$131,003         |                  |                 |                |                  |
| TOTAL CASH & INVESTMENTS                                 |                                       |           |                  | \$19,179,800  | \$18,909,205      |                  |                 |                |                  |
| TOTAL CASH & INVESTMENTS 1 YR AGO                        |                                       |           |                  | \$16,645,919  | \$16,139,660      |                  |                 |                |                  |
| *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 2025-2026 (Acre-Feet)**

|                          |                   |              |              |              |              |            |            |            |            |            |            |            |              | <b>Month to Date</b> |                   |
|--------------------------|-------------------|--------------|--------------|--------------|--------------|------------|------------|------------|------------|------------|------------|------------|--------------|----------------------|-------------------|
|                          |                   |              |              |              |              |            |            |            |            |            |            |            |              | <b>2025/ 2026</b>    | <b>2024/ 2025</b> |
| <b>Classification</b>    |                   | <b>Jul</b>   | <b>Aug</b>   | <b>Sep</b>   | <b>Oct</b>   | <b>Nov</b> | <b>Dec</b> | <b>Jan</b> | <b>Feb</b> | <b>Mar</b> | <b>Apr</b> | <b>May</b> | <b>Jun</b>   | <b>Total</b>         | <b>Total</b>      |
| AD                       | Ag-Domestic       | 311          | -            | -            | -            | -          | -          | -          | -          | -          | -          | -          | -            | 311                  | 332               |
| MAD                      | Ag-Domestic Multi | 11           | -            | -            | -            | -          | -          | -          | -          | -          | -          | -          | -            | 11                   | 12                |
| AG                       | Ag                | 223          | -            | -            | -            | -          | -          | -          | -          | -          | -          | -          | -            | 223                  | 176               |
| C                        | Commercial        | 108          | -            | -            | -            | -          | -          | -          | -          | -          | -          | -          | -            | 108                  | 89                |
| DI                       | Interdepartmental | 21           | -            | -            | -            | -          | -          | -          | -          | -          | -          | -          | -            | 21                   | 25                |
| F                        | Fire              | 0            | -            | -            | -            | -          | -          | -          | -          | -          | -          | -          | -            | 0                    | 0                 |
| I                        | Industrial        | 2            | -            | -            | -            | -          | -          | -          | -          | -          | -          | -          | -            | 2                    | 1                 |
| OT                       | Other             | 31           | -            | -            | -            | -          | -          | -          | -          | -          | -          | -          | -            | 31                   | 27                |
| R                        | Residential       | 245          | -            | -            | -            | -          | -          | -          | -          | -          | -          | -          | -            | 245                  | 232               |
| RM                       | Residential Multi | 31           | -            | -            | -            | -          | -          | -          | -          | -          | -          | -          | -            | 31                   | 30                |
| RS - P                   | Resale Pumped     | 118          | -            | -            | -            | -          | -          | -          | -          | -          | -          | -          | -            | 118                  | 11                |
| RS - G                   | Resale Gravity    | 177          | -            | -            | -            | -          | -          | -          | -          | -          | -          | -          | -            | 177                  | 478               |
| TE                       | Temporary         | 1            | -            | -            | -            | -          | -          | -          | -          | -          | -          | -          | -            | 1                    | 0                 |
| <b>Total</b>             |                   | <b>1,278</b> | <b>-</b>     | <b>-</b>     | <b>-</b>     | <b>-</b>   | <b>-</b>   | <b>-</b>   | <b>-</b>   | <b>-</b>   | <b>-</b>   | <b>-</b>   | <b>-</b>     | <b>1,278</b>         | <b>1,416</b>      |
| <b>CMWD</b>              |                   | <b>1,070</b> | <b>-</b>     | <b>-</b>     | <b>-</b>     | <b>-</b>   | <b>-</b>   | <b>-</b>   | <b>-</b>   | <b>-</b>   | <b>-</b>   | <b>-</b>   | <b>-</b>     | <b>1,070</b>         | <b>1,219</b>      |
| <b>OJAI</b>              |                   | <b>208</b>   | <b>-</b>     | <b>-</b>     | <b>-</b>     | <b>-</b>   | <b>-</b>   | <b>-</b>   | <b>-</b>   | <b>-</b>   | <b>-</b>   | <b>-</b>   | <b>-</b>     | <b>208</b>           | <b>197</b>        |
| <b>Total 2024 / 2025</b> |                   | <b>1,416</b> | <b>1,580</b> | <b>1,383</b> | <b>1,124</b> | <b>710</b> | <b>680</b> | <b>718</b> | <b>269</b> | <b>265</b> | <b>650</b> | <b>961</b> | <b>1,078</b> | <b>N/A</b>           | <b>10,835</b>     |