

CALIFORNIA COASTAL COMMISSION

455 MARKET STREET, SUITE 300
SAN FRANCISCO, CA 94105
VOICE (415) 904-5200
FAX (415) 904-5400
TDD (415) 597-5885



F9b

May 11, 2023

TO: Coastal Commissioners and Interested Parties

FROM: Dr. Kate Huckelbridge, Executive Director
Cassidy Teufel, Environmental Program Manager
Wesley Horn, Environmental Scientist

SUBJECT: Second Addendum to Staff Report for Coastal Development
Permit No. 9-22-0733 (City of Ventura).

The purpose of this second addendum is to respond to additional correspondence on the staff report and recommendation for the proposed project that was timely submitted but not received by staff at the time the first addendum was prepared. This correspondence is included under the Correspondence 2 tab for this item on the Commission's online agenda for May 2023.

I. CORRESPONDENCE RECEIVED; STAFF'S RESPONSE TO CORRESPONDENCE

The Friends of the Santa Clara River (FSCR) submitted a comment letter dated May 5, 2023. However, the letter as submitted was inaccessible to Commission staff and staff asked FSCR to resubmit the comment letter in another format, which was received on May 8, 2023. The comment letter describes the existing treatment ponds at the Ventura water treatment facility site, describes how the ponds support a variety of bird species and describes how the ponds are a valuable public resource since they provide an opportunity for wildlife viewing and education. The letter then lists specific concerns and questions about the ponds which will be addressed in the sections below.

Species and Habitats

The first group of concerns raised in the FSCR letter focuses on whether professional biological reports were prepared to identify which species are present at the treatment ponds and if protection of the ponds is one of the project's priorities. As discussed further in the staff report and first addendum, the Environmental Impact Report (EIR) prepared for the project discussed and analyzed existing data on the wildlife that are known to visit the ponds, including non-special status species. This analysis relied in part on annual bird count data collected by Audubon. The City of Ventura also

completed a series of special studies of the ponds and Santa Clara River Estuary (SCRE) and conducted stakeholder workshops to understand holistically how all of the habitats within the ponds and SCRE could be improved or adversely affected by the proposed diversions. The studies concluded that the diversions and any resulting changes to the habitats within the SCRE would better support native species and reduce the likelihood of invasion by nonnative species, would more naturally mimic historic hydrologic flows, would stabilize berm breaching, and improve water quality.

Modeling and Response to Diversions

The second group of comments focuses on potential changes to the treatment ponds and the wildlife they support under the 90 percent and 100 percent diversion scenarios. The series of studies carried out by the City as part of the project development and CEQA process included extensive modeling to understand the potential response of the ponds and SCRE to the proposed diversions. That modeling found that a 100 percent diversion may result in the ponds converting to terminal wetlands during dry weather months. However, as further detailed in the Marine Resources Section of the staff report, the City would ensure that such a conversion does not occur by continuing a sufficient volume of flow to the ponds to maintain their existing size and character, even if discharges to the SCRE are reduced to 0.0 MGD (100 percent diversion). If this situation were to change in the future and the City were to propose to permanently discontinue flows into the ponds, the City would be required to seek an amendment to this CDP.

In response to recent inquiries from Commission staff on this issue, the City additionally notes that:

The Wildlife Treatment ponds are water quality polishing ponds that were constructed in uplands when the plant was built, and are technically part of the treatment process. Treated effluent is, and will continue to be discharged to the Wildlife Treatment Ponds, and then effluent flows through the ponds and over a weir into the SCRE... The City is committed to maintaining pond size and water elevation even if discharges to the estuary are reduced to zero. We must maintain the required flow to meet the [Continued Discharge Level] into the estuary as measured after the ponds.

The City has designed and would implement the proposed project in a manner that would ensure the ponds maintain their current size, character and water levels and would continue to support wildlife use.

Recreation and Education

The comment letter asks whether future wildlife viewing and environmental education opportunities at the treatment ponds is part of the project, and if the project supports the use of the ponds for these uses. As discussed above, there would be no changes to the ponds as a result of the proposed project. As such, current wildlife viewing and environmental education opportunities associated with the ponds can be maintained.

However, as part of an active water treatment facility, the City maintains authority to regulate public access to the ponds and uses of the pond areas.

Alternative

Lastly, the FSCR letter suggests a possible alternative to the project that would involve diverting wastewater to the proposed outfall and Advanced Water Purification Plant after this water flows through the treatment ponds. The City evaluated this alternative and determined it would not be feasible because the diversion of tertiary-treated water must be made immediately following tertiary treatment at the existing VWRP and before entering the treatment ponds in order to provide a consistent influent character and quality for the proposed Advanced Water Purification Plant (AWPF) and beneficial water reuse program. If the diversion were to happen after water has passed through the treatment ponds, additional treatment of the water would be required before it could be processed by the AWPF. This alternative would also require extensive construction within the area of the ponds and would also require a stoppage of flows into the ponds during construction, which could result in adverse impacts to the treatment ponds and the habitats of the SCRE in the immediate area.