Addendum No. 1 to the
RiverPark Project
Final Environmental Impact Report

State Clearinghouse No. 2000051046

Prepared for:

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1.0 INTRODUCTION

This document is the first Addendum (Addendum No. 1) to the Certified Final Environmental Impact Report (FEIR) for the RiverPark Project. The City of Oxnard Planning Commission certified the FEIR in July 2002 [check date].

Purpose of this Addendum

When a Final EIR has been certified for a project, CEQA provides for the update of the information in the certified EIR to address changes to a project or changes to the circumstances under which a project will occur. An Addendum to a previously certified EIR may be prepared if changes or additions to the EIR are needed, but none of the conditions calling for a Subsequent EIR as defined in the CEQA Guidelines have occurred. Specifically, Section 15162 of the California Environmental Quality Act (CEQA) Guidelines provides that where the Lead Agency determines that neither project changes, changed circumstances, nor new information requires the preparation and circulation of a Subsequent or Supplemental EIR, the Lead Agency may prepare an Addendum to an EIR. CEQA Guidelines Section 15164 states that the purpose of an Addendum is to provide a way of making minor changes or additions to an EIR. Circulation of an Addendum for public review is not required.

The RiverPark Project, as described and analyzed in the Certified RiverPark FEIR included a proposal for temporary dewatering of limited areas during grading activities. Since the completion of the FEIR, the project applicant has completed additional geotechnical analysis to support the development of detailed construction plans. In response to the new information generated as part of this additional geotechnical analysis, the applicant is proposing a minor change to the proposed dewatering program. Specifically, dewatering of a second location within the project site is now proposed.

This Addendum to the Certified FEIR has been prepared because: (1) no substantial changes are proposed in the project which will require major revisions of the Certified FEIR due to the involvement of new significant effects or a substantial increase in the severity of previously identified significant impacts; (2) no substantial changes in circumstances under which the project is undertaken will occur which will require major revisions of the Certified FEIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified effects; and (3) no new information of substantial importance which was not known and could not have been known with the exercise of reasonable diligence at the time the Certified FEIR was certified as complete, shows any of the following:

(A) the project will have one or more significant effects not discussed in the Certified FEIR; (B) significant effects previously examined will be substantially more severe than shown in the Certified FEIR; (C) mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or, (D) mitigation measures or alternatives which are considerably different from those analyzed in the Certified FEIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Description of Dewatering Program as Analyzed in FEIR

The proposal for temporary dewatering during grading of the RiverPark Project is described on page 4.3-26 of the Draft EIR. Dewatering of a portion of the southeast corner of the existing sand and gravel mine site located in RiverPark Area 'B' as identified in the EIR was proposed and analyzed. Excavation and recompaction of an existing deep fill in this area is required to improve the structural characteristics of the soil in this location consistent with the Mine Reclamation Plan for the mine site that comprises RiverPark Area 'B'. Due to the depth of the excavation required in relation to the elevation of groundwater on the site, temporary dewatering of this location was proposed to lower the groundwater level below the bottom of the planned excavation.

The following description of the proposed dewatering program was provided on page 4.5-69 and 4.5-70 of the Draft EIR: A dewatering evaluation estimated that a wellpoint dewatering system could generate as much as 110 to 130 acre-feet per day (approximately 24,890 to 29,415 gallons per minute (gpm)) of discharge, if the groundwater level was at or below about 55 feet mean sea level (MSL) and excavation down to about 35 feet MSL was required. Further description provided on page 2.0-130 of the Final EIR indicated that this dewatering operation was anticipated to last for three to four months, based on anticipated groundwater levels, to accommodate the grading activities for the reclamation of the stockpile area.

As described on page 2.0-133 of the Final EIR, based on additional geotechnical analysis, the dewatering proposal was refined. The are requiring deep excavation, and dewatering, was determined to be approximately 5.5 acres (approximately a 400 foot by 600 foot area), identified as the deep excavation portion ("Area D") of the Area "C" region illustrated on Figure 2.9 in the Final EIR (provided as the following page). It was estimated that dewatering of this area would be required for approximately 55 days. Discharge of the majority of the water pumped during the dewatering operation to the adjacent mine pits in RiverPark Area 'B' was planned.

Description of Current Dewatering Program

The proposed dewatering program has been further defined in the RiverPark Dewatering Management Plan, dated June 6, 2002, prepared by Integrated Water Resources. This Plan is provided in Appendix A. As a result of the completion of more detailed geotechnical studies to support the preparation of grading plans, it has been determined that dewatering of two areas within RiverPark Area 'B' are required. In addition to dewatering of Area "D" as described above, dewatering of a second area, identified as Area "H" on the figure following this page is now planned.

As discussed in the June 2002 RiverPark Dewatering Management Plan, the temporary dewatering of these two areas is currently planned to occur in October of this year. Based on existing groundwater level elevations, dewatering is planned to sustain groundwater elevations at 15 feet ams (above mean sea level) over an 80-day period within Area "D" and 20 feet ams over a 25-day period within Area "H". The dewatering will be conducted by installing a series of temporary wells surrounding the areas of uncompacted fill and pumping them to create a localized cone of depression which will allow the grading equipment access for excavation and recompaction. The groundwater produced from the dewatering wells will be discharged to two primary locations: the Small Woolsey-Vickers pit and the Large Woolsey pit. The determination of the relative proportions of the pumped water going to each of these pits will be determined by the fundamental operating criteria of maintaining a no-net change to the water level gradient in the area immediately surrounding these locations. Specifically, the water level in the Small Woolsey-Vickers pit will be maintained at the same elevation as that present on the property located immediately east of the Small Woolsey-Vickers pit, with the intent to prevent a change in the existing groundwater gradient present at this property.

2.0 ENVIRONMENTAL ANALYSIS

WATER QUALITY

Summary of Environmental Analysis in FEIR

The potential for the proposed dewatering of Area "D" to impact groundwater quantity and quality was addressed on pages 4.5-69 and 4.5-70 of the Draft EIR. The conclusion of the analysis in the Draft EIR was that if the groundwater pumped during the dewatering operation was discharged to the Santa Clara River, the impact on groundwater quantity and quality would be significant. The analysis also determined that if the pumped water was discharged to a nearby location within the forebay of the Oxnard Aquifer System, the impact on groundwater quantity and quality would not be significant.

Accordingly, Mitigation Measure 4.5-1 (Draft EIR, page 4.5-99) for the construction dewatering states that groundwater extracted as a result of dewatering during construction shall be discharged to the location within the Oxnard forebay to mitigate significant impacts on groundwater quantity and quality to less than significant

The Draft EIR Water Resources Section also identified several leaking underground storage tank (LUST) sites under investigation in close proximity of the RiverPark Project Site. As indicated on page 4.5-50 of the Draft EIR the following three known active LUST sites, as of October 25, 2001, in the industrial areas to the north of the Specific Plan Area were identified

- Poole Oil Company, 3885 E. Vineyard Avenue;
- Ventura Oil, 3815 E. Vineyard Avenue; and
- Sparkletts/McKesson, 210 Beedy Street.

No significant impact was identified with the latter two LUST sites since contamination at these sites was limited to the soil and these sites were actively being remediated. For the Poole Oil Company Site, it was identified in the Draft EIR that elevated levels (i.e., concentrations) of benzene and MTBE had been found in groundwater samples on the Site (Draft EIR, page 4.5-50).

Based on information known at that time and on the results of an analysis presented by Fugro West, Inc. (Fugro) in a November 27, 2001 Technical Memorandum (Fugro, 2001; Draft EIR page 4.5-85), the potential for the dewatering operation to effect the movement of the existing groundwater contamination was not significant for the following reasons:

The contamination at the Poole Oil Company Site consists largely of Total Petrochemical Hydrocarbon (TPH) (gas) compounds, which are relatively immobile and contained onsite. Investigations of this site to date have determined that the mass of MTBE, benzene and TPH in the groundwater on the Site has been largely immobile since the early 1990s.

Groundwater modeling completed indicates that the open Small Woolsey/ Brigham/ Vickers mine pits will significantly dampen the lateral extent, configuration, and the magnitude of water declines from the dewatering.

For these reasons, the Draft EIR concluded that the dewatering operation would not significantly impact the existing contamination from the Poole Oil Company Site or result in a significant impact on groundwater quality related to the contamination.[cite EIR and add threshold of significance to the discussion either in this paragraph or one of the above paragraphs]

In response to comments, the Final EIR included further definition of the proposed dewatering operation, the nature of the existing MTBE contamination on the adjacent Poole Oil site and remediation plans, and additional analysis of the dewatering program. [cite FEIR] Specifically, more detailed groundwater modeling was completed to elaborate on the analysis in the Draft EIR.

As discussed above in Section 1.0, the dewatering program as described in the Final EIR consisted of dewatering of the 5.5 acre Area "D" to approximately 20 feet above MSL for approximately 55 days. Discharge of the majority of the water pumped during the dewatering operation to the adjacent mine pits in RiverPark Area 'B' was planned.

The Groundwater Model developed for the analysis in the Draft EIR was updated to better represent localized conditions within the RiverPark Project Site to provide more detailed analysis. The existing RiverPark Groundwater Model was developed by ETIC Engineering, Inc, as part of the Draft EIR to evaluate long-term loading of storm water on groundwater quality (Draft EIR page 4.5-12) and was based largely on a numerical model by the U.S. Geological Survey (USGS) to study the hydrogeology of the Santa Clara-Calleguas groundwater basin as part of the Southern California Regional Aquifer System Analysis (USGS, 1998).

Groundwater flow simulations were prepared by ETIC Engineering, Inc., using the updated RiverPark Groundwater Model to further evaluate the proposed construction dewatering. This modeling demonstrated that the proposed dewatering operation would not have a significant impact on

groundwater quantity or quality, including any significant impact on the location or extent of the existing MTBE contamination on the adjacent Poole Oil property. These conclusions were consistent with those made in the Draft EIR. [again, state threshold of significance applying to reach conclusion of no sign. Impact]

Updated Environmental Analysis for Proposed Dewatering Program

Additional groundwater flow and chemical transport model simulations were completed by ETIC Engineering, Inc., using the updated RiverPark Groundwater Model to evaluate the potential effects of the simultaneous dewatering of Areas "D" and "H" on water quality. The results of this additional modeling are described in a technical memorandum contained in Appendix B prepared by ETIC Engineering, Inc., dated August 1, 2002.

Model simulations indicate that approximately 53,000 gpm of continuous pumping is required from Area "D" for 80 days in order to achieve the previously discussed target groundwater elevations. Approximately 81,000 gpm of pumping is required within Area "H" for the first 25 days to achieve the previously discussed groundwater elevations in this area during the first 25 days. Representation of dewatering for this scenario was based on pumping from 16 wells at each dewatering area, spaced approximately 80 feet apart. Extracted groundwater was simultaneously recharged to the Vickers/Small Woolsey and Large Woolsey pits in the model simulation, consistent with the Dewatering Management Plan. As stated on page 3 of Appendix B, the groundwater extraction flow rates utilized in the groundwater modeling are based upon modeled conditions and are conservatively high related to actual dewatering rates projected for actual site activity. Because the modeled results use the higher extraction rates, effects related to actual conditions will be similar in all regards but less pronounced.

Based on available hydrogeologic data and groundwater model simulations, the proposed dewatering activities, which include recharge of extracted groundwater into the Vickers/Small Woolsey and Large Woolsey pits over a 80-day period would not result in a significant impact on groundwater quantity or quality, including any significant impact on the location or extent of the existing MTBE contamination on the adjacent Poole Oil property. These conclusions are consistent with those made in the Final EIR. The Final EIR concluded that the dewatering program would not result in any significant impact on groundwater quantity or quality. [same comment – incorporate threshold of sign. into discussion]

As Area "H" is located closer to the Santa Clara River than Area "D", the potential for dewatering of Area "H" to impact the Santa Clara River was examined. The distance from the Area "H" to the flow line of the Santa Clara River ranges between 1000 to 2000 feet. Due to the hydraulic relationship between the

shallow alluvium and the Santa Clara River, negligible and not significant impact on river flows will result from dewatering of Area "H". [same comment re-threshold]

The Santa Clara River is highly dynamic even under ambient (i.e. no dewatering) conditions, with flow to (i.e. contribution of groundwater to the river) and from (i.e. contribution of surface water to groundwater) the river occurring in response to seasonal changes in groundwater level elevations and stream flow. Specifically, during summer months and other dry periods, due to the low rate of recharge and high groundwater pumping in the area, groundwater levels are generally at their lowest elevations and below the elevation of the river.

As a result, the limited water in the river can recharge the aquifer. Conversely, during winter, flows of the Santa Clara River are highly variable. During times when flow is limited (i.e. significant time between storm events), groundwater elevations are likely to be above the stage of the river, causing groundwater to discharge to the river. Hence, when considered as a system, the river and the aquifer interact in such a way that any increased flow from the river to the aquifer induced by dewatering is temporary[Tony, need to clarify that we don't have a short term significance impact] and will be replenished naturally.