Chapter 1 Introduction

The City of Oxnard (City) has prepared this Programmatic Draft Environmental Impact Report (Program EIR, PEIR, DPEIR, and/or Draft PEIR) to provide the public and responsible agencies with information about the potential environmental effects of the City's proposed Public Works Integrated Master Plan (PWIMP, Project, and/or Proposed Project). For more information on the PWIMP, please see Appendix A. The City will be the lead agency under the California Environmental Quality Act (CEQA).

1.1 Purpose of the Program Environmental Impact Report

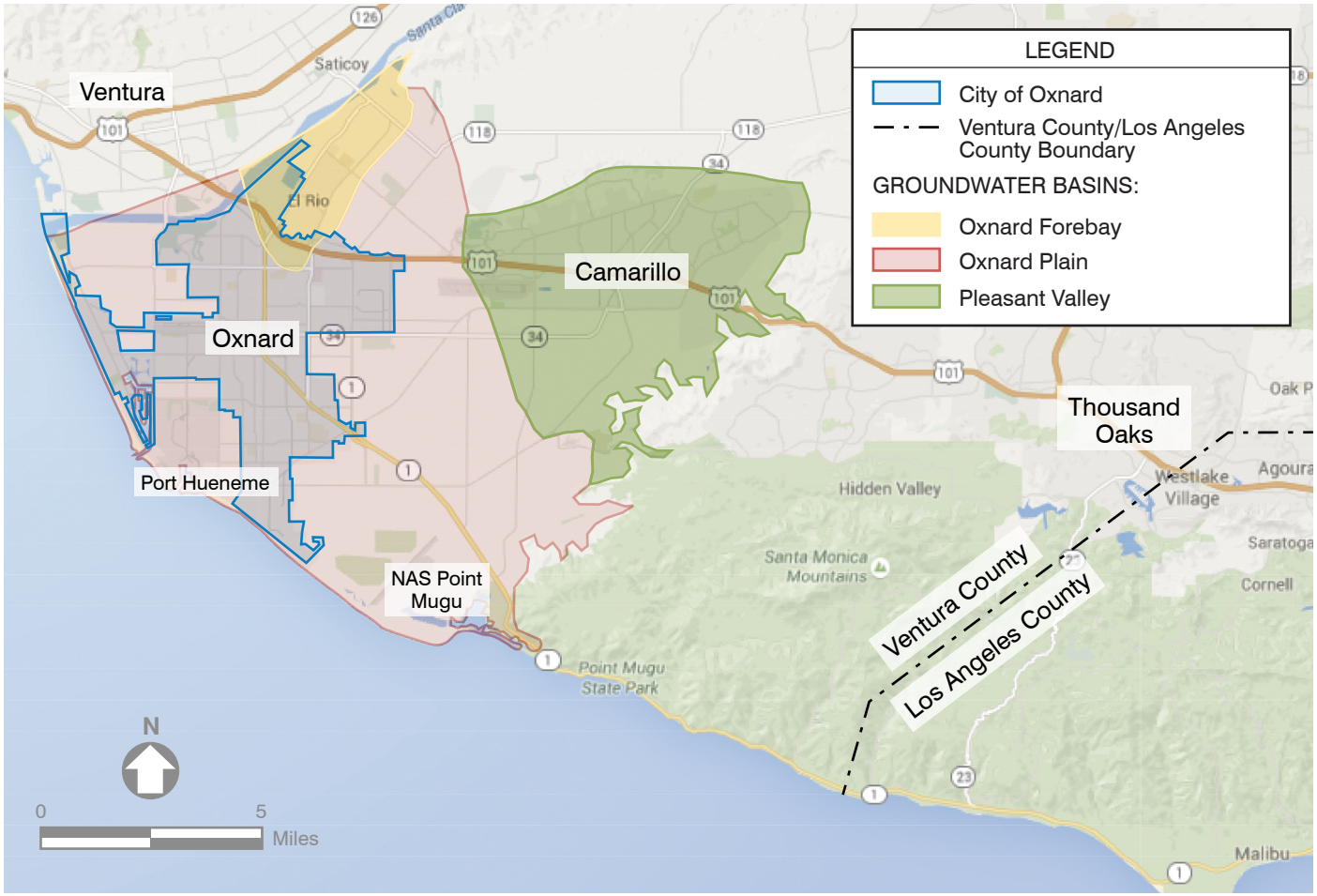
The purpose of this PEIR is to provide the public and responsible and trustee agencies with information about the potential environmental effects of the Proposed Project. This Draft PEIR was prepared in compliance with the California Environmental Quality Act (CEQA) (Public Resources Code Section 21000et seq.) of 1970 (as amended), and the CEQA Guidelines (California Code of Regulations, Title 14). As described in CEQA guidelines Section 15121(a), an EIR is a public information document that assesses potential environmental effects of the Proposed Project, and identifies mitigation measures and alternatives to the Proposed Project that would reduce or avoid adverse environmental impacts. CEQA requires that state and local government agencies consider the environmental consequences of projects over which they have discretionary authority.

CEQA requires that a lead agency neither approve nor carry out a project as proposed unless the significant environmental effects of the project have been reduced to an acceptable level, or unless specific findings are made attesting to the infeasibility of altering the project to reduce or avoid environmental impacts (CEQA Guidelines Sections 15091 and 15092). An acceptable level is defined as eliminating, avoiding, or substantially lessening the significant effects. CEQA also requires that the decision makers balance the benefits of a proposed project against its unavoidable environmental risks. If environmental impacts are identified as significant and unavoidable, the project may still be approved if it is demonstrated that social, economic, or other benefits outweigh the unavoidable environmental impacts. As the CEQA lead agency, the City would then be required to state in writing the specific reasons for approving the project based on information presented in the EIR, as well as other information in the record. This process is defined as a "Statement of Overriding Considerations" by Section 15093 of the CEQA guidelines.

As stated above, the City will be the lead agency for CEQA compliance and will use this document to evaluate the Proposed Project's potential environmental impacts and to aid in the decision-making process.

1.2 Project Location and Background

As shown in Figure 1-1, the City is located along the Pacific Ocean coastline in Southern California, just northwest of Los Angeles. Oxnard is the largest city in Ventura County and is at the center of a regional agricultural industry with a growing business center. The City has jurisdictional authority to provide potable water, wastewater, recycled water, and stormwater services to its nearly 200,000 citizens and numerous industrial and commercial users.



PROJECT AREA FOR INTEGRATED MASTER PLAN

FIGURE 1-1

CITY OF OXNARD

ENVIRONMENTAL IMPACT REPORT

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The City's Public Works Department oversees the water, wastewater, recycled water, and stormwater utilities[1] throughout the City and faces many challenges in managing these four utilities and its future water resources. These challenges include identifying the best response to immediate drought conditions while planning for long-term water needs, reducing dependence on costly imported water, addressing aging infrastructure and reliability concerns, pursuing aggressive goals for energy efficiency and sustainable solutions, as well as maintaining compliance with changing regulatory requirements.

Given the City's challenges and opportunities to meet them, the PWIMP develops long-term recommendations for policies, programs, and goals that successfully address the challenges and opportunities in a holistic and integrated way. Opportunities to meet these challenges range from institutional and non-structural approaches (policies and programs) to technical and structural approaches (capital projects). The PWIMP will help the City respond to planned population increase, challenges from new regulatory requirements, drought conditions, aging infrastructure, and reliability concerns. In addition, the PWIMP documents the policy decisions, goals, and objectives to help protect public health while balancing the environmental, social, and financial impacts of the City's water resources management.

1.3 Proposed Project Vision, Purpose, Need, Goals, and Objectives

The PWIMP provides a phased program for constructing improvements to the City's infrastructure facilities that will accommodate planned growth while maintaining treatment reliability, meeting future regulatory requirements, and optimizing costs through the City's 2030 planning horizon. Specifically, the PWIMP addresses future planning needs including infrastructure additions and upgrades for City's water, wastewater, recycled water, and stormwater utilities. The PWIMP builds upon previous planning efforts using a coordinated methodology, which will allow the City to take full advantage of potential linkages and synergies between the four water utility systems. In addition, the PWIMP is also coordinated with a streets plan in an attempt to allow timing of future streets upgrades to be tied together with infrastructure upgrades.

Drivers. In the first stages of the planning process, key planning drivers were identified that would direct the master planning efforts and evaluate and recommend necessary facilities, policies, and programs within the PWIMP. These drivers are described below.

- Rehabilitation/Replacement (Condition) – A condition trigger was assigned when the process or facility had reached the end of its economic useful life. This trigger is determined by the need to maintain a facility so it can operate reliably and meet performance requirements related to existing regulatory permits, worker and public safety, and protection of the environment.
- Regulatory Requirement – A regulatory trigger was assigned when local, state, or national regulatory requirements necessitated new facilities. Determining when the new facilities would be built depended on the amount of lead-time needed to plan, design, and construct the facilities according to the new requirements.
- Economic Benefit – An economic benefit trigger was assigned when life-cycle costs, consisting of capital costs and operations and maintenance costs, could be significantly reduced. For example, an economic benefit might be realized when an increase in initial capital investment achieves an ongoing reduction in labor, energy, or chemical usage.
- Improved Performance Benefit – An improved performance benefit trigger was assigned when improved operations and maintenance performance led to more reliability and/or reduced

[1] The City manages most of the storm water facilities and the County of Ventura manages the major canals.

operational and safety-related risks. For example, this type of trigger would be applied when improving process control and automation or addressing an operational concern, such as adding flexibility / reliability or decreasing complexity.

Goals and Objectives. For the PWIMP, specific goals and objectives were developed considering the broad drivers established above. These goals and objectives provide a framework and boundaries for the City's planning process and can guide the development of alternatives and strategies as projects progress. Table 1-1 summarizes the PWIMP goals and corresponding objectives.

Table 1-1
Integrated Master Plan Goals and Objectives
Public Works Integrated Master Plan
City of Oxnard

Goal Number	Planning Goals	PWIMP Objectives
1	Provide compliant, reliable resilient and flexible systems	• Improve system reliability consistent with industry standards. • Implement redundancy/ backup systems for routine maintenance and repairs and for addressing security threats. • Implement innovative technology
2	Integrate gray and green infrastructure with an emphasis on energy efficiency	• Optimize the systems' energy efficiency.(1) • Investigate green and gray infrastructure options, such as low impact development techniques for stormwater, or alternative energy sources
3	Effectively manage assets (economic sustainability) Integrate community interests and maximize public acceptance (social sustainability)	• Maximize the cost/benefit ratio. • Spend public money wisely. • Develop sustainable ongoing communication processes. • Minimize impacts to the public
4	Mitigate and adapt to potential impacts of climate change	• Minimize potential climate change-related impacts to the system (e.g., sea level rise or changing rainfall patterns).
5	Protect environmental resources	• Maintain permit/regulatory compliance. • Position City for future regulatory changes. • Enhance environmental sustainability • Maximize water conservation. • Maximize wastewater reclamation and reuse. • Manage groundwater extraction. • Maximize the beneficial reuse of biosolids.

Water and Recycled Water Goals. In addition to the goals and objectives included in Table 1-1, specific water supply goals that provide a framework for alternatives development and comparison were identified. These water supply goals include:

- Provide reliable/resilient supply to meet future conditions (i.e., changes to demand, regulations, and water quality).
- Meet City's water quality objectives.
- Protect existing water rights by maximizing use of groundwater allocation.
- Minimize future reliance on imported water by maximizing use of AWPF Facility.
- Attract industry and jobs.
- Keep rates affordable.

The Oxnard Plain Groundwater Basin's safe yield is a major constraint placed on the City's water system. The Fox Canyon Groundwater Management Agency (FCGMA) protects the quantity and quality of the local groundwater by overseeing and managing all contractual withdrawals within the Oxnard Plain

Groundwater Basin.

Wastewater Goals. While no goals specific to wastewater were identified, all projects proposed in this PWIMP are centered on the goals presented in Table 1-1. Key considerations for wastewater planning in Oxnard revolved around repairing and replacing (R&R) the existing system to maintain its reliability and safety as well as meeting or surpassing all regulatory requirements for wastewater effluent discharge.

Stormwater Goals. In addition to the goals presented in Table 1-1, two stormwater specific objectives include maintaining the existing infrastructure and ensuring compliance with the Total Maximum Daily Load (TMDL). The PWIMP focuses on stormwater projects that will improve stormwater quality entering the environment and that can potentially harvest stormwater as an additional water supply. By including stormwater in the PWIMP, the integrated water utility system can become more robust, adaptable, and cost efficient.

1.4 Key Planning Considerations and Assumptions

Although each utility (water, wastewater, recycled water, and stormwater) has its own set of specific design criteria based on each system's unique features, a common set of planning considerations and assumptions formed the basis for developing and evaluating each project. These key planning considerations are discussed in the following sections.

Population and Land Use. Population and land use projections help to determine the City's planned growth. With these projections, future water demands and wastewater flows can be calculated and used to determine additional water and wastewater infrastructure capacity required. The PWIMP is flexible and sensitive to changes in the timing of future water utility infrastructure capacity. With this flexibility and sensitivity, constructing additional capacity can occur quickly when needed, providing for the least-cost future Capital Improvement Plan.

Land Use Projections. Land use projections were based on the City's 2030 General Plan and on conversations with the City's Planning Division. The future division between residential, commercial, and industrial users is assumed to remain largely the same as the current mix. As such, residential infill and mixed-use development are expected to form the largest population increase. Specific developments that will trigger significant growth include RiverPark, The Village, and potentially the South Shore and Teal Club Specific Plans.

Population Projections. A wide range of population projections were considered conceptually and three were evaluated in more detail. These three population projections are described below. Two of the three projections were based on the City's 2030 General Plan, which was adopted in 2011 and extends through the year 2030. Using a variety of assumptions, this plan forecasted the 2030 population to be between 238,996 and 285,521. These two population forecasts are referred to as the low and high forecasts of the 2030 General Plan.

Because the 2030 General Plan population projections used data before the 2008 recession, the effects of the recession on population growth were not taken into account in these low and high forecasts. In response to this discrepancy, the City's Planning Division updated the 2030 General Plan population forecast in 2014 based on the 2010 Census and housing projections developed by Traffic Analysis Zone. The updated information formed the basis for the third projection, which projected a population below the low forecast of the 2030 General Plan.

The City's population forecasts vary significantly. The lowest population forecast (2014 Update) reflects

an average growth rate of 0.5 percent per year, whereas the highest projection (2030 General Plan – High Forecast) reflects an average annual growth rate of 1.5 percent for the next 25 years. The City's population is currently trending toward the 2030 General Plan's low forecast. Because of this, the PWIMP used the 2030 General Plan's low forecast to establish the planned needs and phasing of future capacity. These lower population projections were modified somewhat when combined with higher, more conservative per capita flows used to project water and wastewater flows.

Climate Change. In addition to population, climate change can affect all utilities considered in the PWIMP. The chemistry and dynamics of atmospheric greenhouse gases, including water vapor and carbon dioxide, hold heat in the atmosphere and create a natural greenhouse effect for the planet. Since the onset of the Industrial Revolution, data show that human-generated emissions of greenhouse gases, such as carbon dioxide, methane, nitrous oxide, and chlorofluorocarbons, have been accumulating in the atmosphere and are intensifying Earth's natural greenhouse effect more rapidly than expected (Rahmstorf, et al., 2007). Although the scientific community is not in total agreement about the causes of climate change, scientists predict that sea levels will rise and that more frequent and intense storms will occur. Thus, this Plan focuses on how rising sea levels might affect the wastewater system and how changes in precipitation patterns and the potential for drought might affect water supply and stormwater collection system capacity.

Sea Level Rise. Sea level is the ocean's elevation relative to a reference elevation. Data has shown that sea levels have increased over the last 100 years and are expected to accelerate at a faster rate in the future. Depending on the projection used, sea levels could rise anywhere from 7 to 18 feet by the year 2100. Since rising sea levels will affect the City's facilities, planning efforts incorporated these projections into the wastewater planning.

Rainfall. The City has experienced an increase in extreme precipitation events consistent with scientists' projections of a changing, warming climate. Although the amount of annual rainfall has increased only slightly, rainfall events are likely occurring more frequently and becoming more intense, with distribution patterns changing as well. Until regional climate models can provide more accurate projections for the Oxnard area, long-term planning should assume that more frequent and intense precipitation events and changing weather patterns will continue.

Drought. The number of dry days during summer months is also expected to increase, extending California's already long dry season. As such, longer, drier, and more frequent periods of drought are anticipated, with up to 2.5 times the number of critically dry years by the end of the century. Until more accurate scientific information and regional model results indicate otherwise, the California Department of Water Resources recommends that local agencies assume a 20 percent increase in the frequency and duration of future dry conditions to prepare for future droughts (DWR 2008h).

Sustainability. The City seeks to develop sustainable water solutions and infrastructure. As such, the PWIMP used the Envision® Sustainability Rating System as a framework for developing the evaluation criteria and metrics for strategies and alternatives. Each of the five PWIMP goals (shown in Table 1-1) were assessed through the lens of the Envision® tool to help further define these goals in a way that produces measureable metrics for comparing alternatives.

Envision®. The Envision® Rating System was developed through a joint collaboration between the Zofnass Program for Sustainable Infrastructure at the Harvard University Graduate School of Design and

the Institute for Sustainable Infrastructure[2]. It provides a holistic framework for evaluating and rating the community, environmental, and economic benefits of all types and sizes of infrastructure projects. The Envision® Rating System evaluates, grades, and recognizes infrastructure projects that use transformational and collaborative approaches to assess the sustainability indicators throughout a project's life cycle. The PWIMP used Envision® to make an initial assessment of sustainability at the "big picture" level. This assessment was informed by the City's overarching values and goals for sustainability as much as it was by the goals and objectives of the PWIMP. With the assessment, a minimum performance level for reducing greenhouse gas emissions was identified and stretch goals were established to show the range of sustainable principles that could be implemented. This assessment also helped to develop criteria used to evaluate and compare alternatives.

From the initial assessment, two types of evaluation tests emerged. The first type was termed an overarching principle (OP), which is the minimum threshold every alternative must meet to be considered viable. The second type was termed a measurable criterion (MC), which is a result that can be measured, quantified, and assigned (a "metric") to determine the relative performance of alternatives.

Table 1-2 summarizes the OP, and MC, associated with each of the five major goals of the PWIMP.

Table 1-2
Evaluation Criteria Established for Public Works Integrated Master Plan
City of Oxnard

Goal	Objective	Type of Criteria	Metric	Unit of Measure	Associated Envision® Credit
#2	**Investigate Gray and Green Infrastructure with an Emphasis on Energy Efficiency**				
	Investigate gray and green infrastructure	OP			NW2.1 Manage Stormwater (through LID).
	Maximize energy efficiency/sustainable energy use.	MC	Net nonrenewable Energy Use (Energy use – Energy production Renewable energy use/ purchase	kWh/year	RA2.1 Reduce Energy consumption. RA2.2 Use renewable energy
#3	**Manage Assets Effectively (Economic Sustainability)**				
	Maximize cost/benefit ratio.	MC	Capital Costs O&M Cost ($/year) Life-cycle Costs	Total Project Cost ($) Total O&M Cost ($/year) Annual Costs ($/year)	LD3.3 Extend O&M Costs Useful Life.
#4	**Mitigate and Adapt to Potential Impacts of Climate Change**				
	Minimize impacts to system due to events related to climate change.	OP			CR2.1 Assess climate threat. CR2.2 Avoid traps and vulnerabilities. CR2.3 Prepare for long-term adaptability.

[2] The Institute for Sustainable Infrastructure (ISI) is a 501 (c) (3) not for profit organization, structured to develop and maintain a sustainability rating system for civil infrastructure in the United States. ISI was founded by the American Council of Engineering Companies (ACEC), the American Public Works Association (APWA), and the American Society of Civil Engineers (ASCE) and is governed by a nine-member Board of Directors appointed by the founding organizations.

Table 1-2
Evaluation Criteria Established for Public Works Integrated Master Plan
City of Oxnard

Goal	Objective	Type of Criteria	Metric	Unit of Measure	Associated Envision® Credit
	Minimize contribution to climate change factors through reducing/minimizing GHG emissions.	MC	Greenhouse Gas Emissions	Metric tons of CO2 equivalent Emissions per year	RA1.1 Reduce net embodied energy. CR1.1 Reduce greenhouse gas emissions.
#5	**Protect/Enhance Environmental/Resource Sustainability**				
	Maintain regulatory/permit compliance.	OP			QL2.1 Protect public health.
	Maximize sustainable water use.	MC MC	Potable Water Offset Groundwater Replenishment	MG per year MG per year	RA3.1 Protect fresh water availability. RA3.2 Reduce potable water consumption. RA3.1 Protect fresh water availability
	Maximize beneficial reuse of solids.	MC	Solids Reused	Tons per year	RA1.5 Divert waste from landfills

Notes:
OP = Overarching Principle
MC = Measured Criteria
QL = Quality of Life
RA = Resource Allocation
LD = Leadership
NW = Natural World
CR = Climate & Risk

Energy. Although the City has a broad interest in applying sustainable solutions, it specifically aims to reduce energy use and increase energy efficiency throughout the system. As part of this effort, the City completed an Energy Action Plan in April 2013 and committed to pursuing the "Gold Level" as defined in Southern California Edison's Energy Leadership Partnership Program.

This goal targets a 10 percent reduction in energy use for City Government facilities. Oxnard's Energy Plan expands this 10 percent reduction to the community at large, calling for a 10 percent city-wide reduction in electricity and natural gas use. By implementing all recommended Energy Plan programs, State programs, and programs implemented since 2005, Oxnard is expected to decrease its greenhouse emissions by 114,000 million tons (MT) of CO_2 equivalent, which is an 8 percent reduction.

As part of the planning efforts for the PWIMP, the Energy Plan's recommendations were incorporated into the recommended CIP. The following three main recommendations were applicable:

- Incorporate Greening Guidelines: Incorporate green strategies by constructing new facilities that reduce energy consumption.
- Increase Onsite Electricity Generation at City Wastewater Treatment and Materials Recovery Facility: Investigate increasing the fats, oil, and grease collected for bio-gas electricity generation at the wastewater treatment plant.
- Recycled Water Outreach and Education Program: Expand use of the advance water purification facility (AWPF) and educate the public on the energy savings associated with it.

Basis of Costs. Cost estimates were also coordinated across each utility to ensure comparable and consistent estimates. These estimates are described below.

The Association for the Advancement of Cost Engineering International (AACE International, formerly

known as the American Association of Cost Engineers) has suggested levels of accuracy for five estimate classes. These five estimate classes are presented in the AACE International Recommended Practice No. 17R-97 (Cost Estimate Classification System – As Applied in Engineering, Procurement, and Construction for the Process Industries). For projects in the PWIMP, cost estimates were developed following the AACE International Recommended Practice No. 17R-97 estimate Classes 4 and 5. Class 4 and 5 estimates are appropriate for master planning purposes and are derived from previous project costs and factored estimates where the former were not available.

Additionally, due to the differing nature of projects that occur within a treatment plant and for a collection or distribution system, two approaches were taken to estimate costs. The first approach, outlined in Table 1-3, is the method used for all projects recommended within the fence line of the OWTP and AWPF. The second approach, also outlined in Table 1-3, is the method used for all other capital improvement projects recommended for the PWIMP, including the water blending stations.

Table 1-3
Basis for Estimating Project Costs for the Public Works Integrated Master Plan
City of Oxnard

Item	Estimated Cost at OWTP and AWPF(1)	Estimated Cost for All Other Projects(2)
Base Construction Cost from Carollo Cost Curves and past projects (Bid Tabs)(3):	"A"	"A"
• Adjust base construction cost for field piping(4)	15% of "A"	--
• Adjust base construction cost for electrical/instrumentation(4)	20% of "A"	--
• Adjust base construction cost for sheeting/shoring/piles and painting(4)	10% of "A"	--
Subtotal ("B")	**145%**	**100%**
Construction Contingency	15% of "B"	30% of "B"
Subtotal Construction Cost ("C")	**167%**	**130%**
Project Cost Factor[5]	24% of "C"	24% of "C"
Total Estimated Project Cost ("D")	**207%**	**161%**

Notes:
(1) Used to estimate all costs considered within the fence line of the treatment facilities.
(2) Used to estimate all costs considered outside the fence line (i.e., pipelines, well pumps, booster pumping, and storage).
(3) Adjust this cost to 20-City Index ENR CCI of 9962 (February 2015) and needed city location adjustment factors.
(4) Costs are adjusted based on site-specific conditions.
(5) Includes all "soft" costs: engineering, administration, legal, and construction management.

The main difference in these approaches is that the OWTP and AWPF projects use a construction contingency of 15 percent, whereas all other projects use a construction contingency of 30 percent. The different contingencies reflect the type of work being done and the more detailed nature of the OWTP and AWPF projects.

Table 1-4 presents the economic criteria used to estimate annual costs for all projects. When developing annual costs, these criteria are applied to capital and Operations and Maintenance (O&M) costs.

Table 1-4 Economic Criteria
Public Works Integrated Master Plan
City of Oxnard

Item	Assumption
Costs in Time and Place(1)	Costs are based on Oxnard costs in February 2015
Inflation Rate(2)	Annual inflation rate is assumed to be 3 percent
Interest Rate(2)	5 percent for amortization purpose
Amortization Period	20 years

Note:
(1) 20-City Average Index ENR CCI of 9,962 was used for February 2015. A R.S. Means Location Factor of 106.6 for Oxnard was used (ENR,

Table 1-4 Economic Criteria Public Works Integrated Master Plan City of Oxnard	
Item	**Assumption**
2015) (RSMeans, 2015). (2) The inflation and interest rate are based on past experience with and an understanding of the economic climate of this industry.	

1.5 Regulatory Requirements

Detailed below are the current and projected regulatory requirements.

Water. Water treatment and supply facilities must meet all state and federal water quality guidelines. The United States Environmental Protection Agency (USEPA) establishes federal regulations in the form of the Safe Drinking Water Act, and the California Division of Drinking Water (DDW) administers state guidelines. Because the City's drinking water supply is a blend of surface water and groundwater, regulations apply to both.

- **Current.** Local groundwater wells are a major source of the City's water, making groundwater regulations the most relevant. Since wholesalers providing surface water to the City must meet treatment regulations before the water enters the system, surface water regulations related to treatment are not summarized in this chapter. In this case, the Calleguas Municipal Water District (CMWD) is responsible for meeting all applicable surface water treatment regulations. The City, however, must meet any distribution-related regulation related to water quality. Table 1-5 summarizes current regulations focused on water quality within groundwater and distribution systems.

Table 1-5 Overview of Relevant Drinking Water Regulations Public Works Integrated Master Plan City of Oxnard		
Regulation	**Compliance Date**	**Requirements and Maximum Contaminant Level (MCL)**
Safe Drinking Water Act and National Primary Drinking Water Regulations	Ongoing	Maximum contaminant levels (MCLs), maximum contaminant level goals (MCLGs), and/or treatment techniques set for 83 contaminants, including turbidity, seven microorganisms (two of which are indictors), four radionuclides, 16 inorganic contaminants, and 57 organic contaminants.
Stage 1 Disinfectants and Disinfection Byproducts Rule	1/1/01 – monitoring 1/1/02 – MCL compliance	Reduced total trihalomethanes (TTHM) limit from 0.1 to 0.080 milligrams per liter (mg/L); reduced haloacetic acids (HAA5) limit from 0.08 to 0.060 mg/L. Established an MCL for bromate of 0.010 mg/L; Established an MCL for chlorite of 1.0 mg/L Compliance for TTHMs & HAA5 based on a running annual average
Stage 2 Disinfectants and Disinfection Byproducts Rule	10/1/06 – first provision 1/1/13 – all provisions	Perform Initial Distribution System Evaluation to identify new DBP compliance locations. Change compliance calculations from RAA to Locational Running Annual Averages.
Radionuclides Rule	12/31/07	Updated standards: Combined radium 226/228: 5 pCi/L. Total beta particles and photon emitters: 4 mrem/yr. Gross alpha particles (excluding U and Rn): 15 pCi/L. Uranium MCL: 30 µg/L.
Arsenic Rule	1/23/06	Arsenic MCL: 0.010 mg/L.
Secondary Drinking Water Regulations	Ongoing	Non-enforceable standards for aesthetic parameters.
Partnership for Safe Water	Ongoing	Voluntary standards and practices to minimize risk of microbial contamination of treated water.
Inorganic Chemicals	Various	Existing National Primary Drinking Water Regulations (NPDWRs) set standards for a number of different metals and other inorganic chemicals, including aluminum and nitrate.
Synthetic and volatile organic chemicals	Various	Existing NPDWRs for a number of different herbicides, pesticides, solvents, and other organic chemicals. Monitoring and reporting requirements.

Table 1-5
Overview of Relevant Drinking Water Regulations
Public Works Integrated Master Plan
City of Oxnard

Regulation	Compliance Date	Requirements and Maximum Contaminant Level (MCL)
Lead and Copper Rule and 2007 Revisions	1993 - 4/10/2008	Requires water suppliers to optimize their treatment system to control corrosion in a customer's plumbing. If lead action levels are exceeded, the suppliers are required to educate their customers about lead and suggest actions to reduce their exposure through public notices and public education programs.
Revisions Cr(VI)	CA MCL - 4/2014	DDW established MCL of 10 µ g/L.
New "lead free" standard under the SDWA	1/4/14	Amends SDWA Section 1417 – Prohibition on Use and Introduction into Commerce of Lead Pipes, Solder, and Flux: Changes the definition of "lead-free" by reducing lead content from 8 percent to a weighted average of no more than 0.25 percent in the wetted surface material. This change primarily affects brass/bronze.
Combined Volatile Organic Compounds	Projected 10/14 proposal, 6/15 final	Efforts to define a VOC Rule are ongoing. The novel "group risk" approach focuses on total public health as opposed to each chemical. This may be combined using a common analytical method, treatment, or MCLG.
Revised trichloroethylene and tetrachloroethylene MALss	Unknown	These may be regulated separately from other VOCs.
Revised Lead and Copper Rule	Projected 2017	The EPA is evaluating all aspects of the current rule
Nitrosamines	April 2016	The EPA is collecting data for possible future group MCL for nitrosamines (byproduct of chloramines). California Notification Level of 0.01 µg/L for NDMA.
Revised Total Coliform Rule	April 2016	Requires that MCL for Total Coliforms (including fecal coliform and E. coli) are no more than 5 percent of samples total coliform-positive.

In addition to regulations related to groundwater quality, the quantity of groundwater use is managed by the Fox Canyon Groundwater Management Agency (FCGMA), an organization created by the California Legislature in 1982 to oversee Ventura County's vital groundwater resources. As an independent, special district separate from the County of Ventura or any city government, the FCGMA manages and protects both confined and unconfined aquifers within several groundwater basins beneath the southern portion of Ventura County. The FCGMA is preparing Groundwater Sustainability Plans (GSPs) for the Las Posas Valley Basin, Oxnard Subbasin, and Pleasant Valley Basin. The FCGMA establishes a set of ordinances directed at groundwater extraction. The most recent ordinance, Emergency Ordinance E, limits extractions from groundwater extraction facilities, including the City, due to the drought's impacts on underlying aquifers. For further discussion, please refer to Chapter 3.9 Hydrology, Water Quality, and Water Utilities.

- **Future (Potential Regulations).** Future regulations that could potentially affect the City's water Supply system are also summarized in Table 1-5.

Wastewater – Quality. Detailed below are the current and projected future wastewater quality requirements.

- **Current.** Wastewater discharges are governed by both federal and state requirements. The primary laws regulating water quality are the Clean Water Act (CWA) and the California Water Code. Under the CWA, the EPA or a delegated State agency regulates discharging pollutants into waterways through the issuance of National Pollutant Discharge Elimination Systems (NPDES) permits. NPDES permits set limits on the amount of pollutants that can be discharged into the waters of the United States. Since the Oxnard Wastewater treatment Plant (OWTP) is located in the Los Angeles Region, the Los Angeles Regional Water Quality Control Board (LARWQCB) has authority to issue permits for wastewater discharge and waste discharge requirements for recycled water use.

  Currently, the OWTP discharges to the Pacific Ocean under existing NPDES permit

(CA0054097), which was adopted by the LARWQCB on July 26, 2013. This permit establishes discharge limits for conventional constituents, nutrients, metals, and organics.

The aim of these limits is to protect aquatic life and other beneficial uses of the receiving water. Table 1-6 lists conventional constituents and metals with their permit limits.

Table 1-6
OWTP NPDES Permit Limits
Public Works Integrated Master Plan
City of Oxnard

		Effluent Limitations(1)				
Constituent	**Units**	**Average Monthly**	**Average Weekly**	**Maximum Daily**	**Instantaneous Minimum**	**Instantaneous Maximum**
Biochemical Oxygen Demand (BOD_5)	mg/L	30	45	--	--	--
	lbs/day	7,960	11,900	--	--	--
Total Suspended Solids (TSS)	mg/L	30	45	--	--	--
	lbs/day	7,960	11,900	--	--	--
pH	standard units	--	--	--	6.0	9.0
Oil and Grease	mg/L	25	40	--	--	75
	lbs/day	6,630	10,600	--	--	19,900
Settleable Solids	ml/L	1.0	1.5	--	--	3.0
Turbidity	NTU	75	100	--	--	225
Chronic Toxicity	TUc	--	--	99	--	--
Gross alpha	PCi/L	--	--	15	--	--
Gross beta	PCi/L	--	--	50	--	--
Combined Radium-226 & Radium-228	PCi/L	--	--	5.0	--	--
Tritium	PCi/L	--	--	20,000	--	--
Strontium-90	PCi/L	--	--	8.0	--	--
Uranium	PCi/L	--	--	20	--	--
Benzidine(2)	ug/L	0.0068	--	--	--	--
	lbs/day	0.0018	--	--	--	--
Heptachlor epoxide(2)	ug/L	0.002	--	--	--	--
	lbs/day	0.00053	--	--	--	--
Polychlorinated biphenyls (PCBs)(2)	ug/L	0.0019	--	--	--	--
	lbs/day	0.0005	--	--	--	--
Tetrachlorodibenzo-p-dioxin (TCDD) Equivalents(2)	ug/L	0.00000039	--	--	--	--
	lbs/day	0.0000001	--	--	--	--

Notes:
(1) From the 2013 NPDES Permit No. CA0054097.
(2) The reasonable potential analysis' result is inconclusive. Therefore, limitations are carried over from Order No. R4-2007-0029, as amended by Order No. R4-2010-0048, to avoid backsliding.

- **Future (Potential).** As analytical techniques for detecting toxic compounds improve and detection limits drop, additional parameters might exceed California ocean plan objectives. As such, effluent limits might be added to the OWTP NPDES permit.

Air Quality. The current and future potenetial air quality reguloations are discussed below.

- **Current.** At a local level, the Ventura County Air Pollution Control District (APCD) is primarily responsible for controlling air pollution from the OWTP. Beyond the local level, air quality permits are required by State and Federal laws as part of doing business in Ventura County. The OWTP currently holds permits from the District for the following sources:
    - Two effluent pump natural gas engines.

- Three electrical generator waste gas engines.
- Two waste gas burners.
- One odor reduction tower.
- One odor control system (headworks).
- One odor reduction station (solids processing building).
- Six standby diesel engines for electricity generators.
- One emergency standby diesel engine for air compressor.

The APCD also regulates the emission of certain odorous substances, such as sulfur dioxide and hydrogen sulfide. Improvements and changes to the wastewater process and discharge location are likely to require revised air quality permits. Table 1-7 summarizes these concentration levels.

Table 1-7
Hydrogen Sulfide and Sulfur Dioxide Ground Level Concentrations - Emission Limits
Public Works Integrated Master Plan
City of Oxnard

Substance	Limit Ground Level Concentration (ppm)	Duration
Hydrogen Sulfide(1)	0.06 or 0.03	Averaged over 3 consecutive minutes Averaged over 60 consecutive minutes
Sulfur Dioxide(1)	0.25 or 0.04	Averaged over 60 consecutive minutes Averaged over 24 hour period

Notes:
(1) Source: Ventura County Air Pollution Control District Regulation 4, Rule 54, (July 1994).
(2) http://www.vcapcd.org/Rulebook/Reg4/RULE%2054.pdf .

- **Future (Potential).** A recent amendment to the APCD's air quality regulations may affect the OWTP in the near future. This amendment, called Rule 54, was amended in January 2014 to limit sulfur dioxide emissions to 75 parts per billion (ppb) at or beyond the property line. Although existing sources do not need to demonstrate compliance, all sources must meet the combustion emission limit on a dry basis using a revised calculation to account for percent oxygen content.

  In addition to this amendment, a draft amendment to Rule 74.15.1 regarding boilers, steam generators, and process heaters might also affect regulations. This rule would limit nitrogen oxide emissions for new or replacement units rated greater than 2 million BTU/hr and less than 5 million BTU/hr. These new limits would be based on similar standards adopted by the San Joaquin Valley in Rule 4307.

Biosolids. Currently, the OWTP disposes of its screenings, grit, and dewatered anaerobically digested solids (biosolids) by hauling it to a nearby landfill. To best use the energy and nutrient content, alternatives to landfilling biosolids were considered in the PWIMP. The following current and future potential regulations are as follows.

- **Current.** The EPA's 40 CFR 503 regulations are the main federal regulations of biosolids. The 40 CFR 503 regulations establish metal concentration limitations, pathogen density reduction requirements, vector attraction reduction requirements, and site management practices for the land application of biosolids. The 40 CFR 503 regulations also establish requirements for the surface disposal and incineration of biosolids.

  In California, State regulations of biosolids land application are more stringent than federal regulations. The State Water Resources Control Board (SWRCB) has adopted General Waste

Discharge Requirements for the Discharge of Biosolids to land for use as a Soil Amendment in Agricultural, Silvicultural, Horticultural, and Land Reclamation Activities (Biosolids General Order).

The Biosolids General Order goes beyond the requirements of 40 CFR 503 by requiring additional biosolids testing, soil testing, groundwater sampling, and wind and dryness limitations. Regulations for biosolids reuse and disposal in landfills in California are also more stringent and fall under the jurisdiction of the California Department of Resources Recycling and Recovery (CalRecycle). In addition to regulating the co-disposal of biosolids in landfills and the use of biosolids for alternative daily cover, CalRecycle also regulates facilities that compost biosolids.

- **Future (Potential).** Using or disposing of biosolids is becoming increasingly difficult in California. Many California utilities are restricting the land application of biosolids, and fewer landfills are accepting them. Furthermore, the State of California has passed several bills that directly affect the ability to send biosolids to landfills in the future.

  Two bills in particular affect the land application of biosolids: Assembly Bill 341 and Assembly Bill 1594. In 2013, California passed Assembly Bill 341, which requires a 75 percent reduction of solid waste sent to landfills by 2020. (It is expected that by 2025, a 90 percent reduction of solid waste sent to landfills will be required.) In September 2014, Assembly Bill 1594 was passed, requiring that green waste no longer qualifies for diversion credit when used as alternative daily cover at a landfill. When this bill is fully implemented January 1, 2020, the diversion credits that utilities currently receive will be eliminated.

  Approximately 30 percent of the solid waste stream sent to landfills is organic, which CalRecycle is working to eliminate from landfills in support of the Air Resources Board Assembly Bill 32 Scoping Plan's target to reduce greenhouse gas emissions to 1990 levels by 2020. Although the Assembly Bill 32 Scoping Plan does not explicitly state that organic waste streams are or will be prohibited from use as alternative daily cover, it does state that opportunities for phasing out landfilling organic material are being pursued.

Recycled Water. The current and future projected regulations are discussed below.

- **Current.** The City has served urban irrigation uses since 2015 and agricultural uses as early as 2016. The City plans to use recycled water as agricultural irrigation by early 2016 and aquifer storage and recovery (ASR) and groundwater recharge for indirect potable recharge/direct potable recharge (IPR/DPR). However, since DPR is currently not regulated, the permitting process is still somewhat uncertain and occurs on a case-by-case basis. Based on the uses of recycled water being considered by the City, the following regulations and policies apply:
  - Urban/Agricultural Reuse – California Code of Regulations (CCR), Title 22, Division 4, Chapter 3, Section 60301 et seq. (Title 22) & the Recycled Water Policy (SWRCB Res No. 2009-0011, recycled water (RW) Policy).
  - IPR/Groundwater Recharge – DDW's Groundwater Recharge Regulations and SWCRB's Recycled Water Policy and Anti-Degradation Policy.

  The applicable recycled water regulations noted above are summarized in the following sections. In addition to the above regulations, the City's GREAT program is currently permitted under Waste Discharge Permit, Order No. R4-2011-0079-A01 was amended in July 2015. This permit

covers non-potable reuse within the GREAT program.

- **Non-Potable.** The DDW is now California's primary agency responsible for protecting public health, regulating drinking water, and developing uniform water recycling criteria appropriate for particular water uses. The DDW published the Title 22 recycled water regulations (CDPH, 2014a). Based on the level of treatment the AWPF will provide, per Title 22, non-potable uses of the City's recycled water include surface irrigation of food crops, parks, playgrounds, school yards, residential and freeway landscaping, unrestricted access golf courses, and some construction uses. Recycled water can also be used in industrial or commercial cooling or boiler operations as well as recreational impoundments.
- **Indirect/Direct Potable Reuse.** The primary State agencies responsible for regulating an IPR project include DDW, Los Angeles Region Water Quality Control Board (LARWQCB), and the SWRCB. Because the purpose of IPR is to discharge to the existing Oxnard Plain Groundwater Basin and withdraw for potable reuse, several regulations apply. All of the applicable regulations that pertain to the installation and operation of IPR are summarized in Table 1-8.

Table 1-8
Summary of All Applicable Regulatory Requirements for Recycled Water Systems
Public Works Integrated Master Plan
City of Oxnard

Governing Agency	Applicable Regulation/Policy	Regulatory Concept/Objective
DDW	Title 22, Division 4, Chapter 3 of the California Code of Regulations	Stipulates criteria for both non-potable uses of recycled water and groundwater recharge for subsequent potable use, with the most recent version updated as of June 2014 (CDPH, 2014).
	60320.208	Requires that specific pathogen reduction targets must be met through multiple treatment processes. The log reduction requirements for viruses, *Giardia,* and *Cryptosporidium* are 12, 10, and 10, respectively.
	60320.210	Requires that a total nitrogen standard of ≤10 mg/L must be met at all times.
	60320.218	Requires a minimum TOC value of ≤0.5 mg/L is required.
	60320.226	Requires that, before operation, monitoring wells are placed in appropriate locations to monitor the movement and water quality of the injected water.
LARWQCB	Update WDRs Permit	Requires an amendment to the existing permit or a reissuance of a WDRs/WRR will be necessary prior to discharge.
SWRCB	Recycled Water Policy	Include Salt Nutrient Management Plans (SNMPs), Recycled Water Groundwater Recharge Projects (GRPs), anti-degradation, and monitoring constituents of emerging concern (CECs).
	SNMPs	Manages salts and nutrients from all sources "… on a basin-wide or watershed-wide basis in a manner that ensures attainment of water quality objectives and protection of beneficial uses."
	GRPs	Requires compliance with regulations adopted by CDPH (now DDW) for groundwater recharge projects (CDPH, 2014).
	Anti-Degradation Policy (Resolution 68-16)	"… [Ensures that (a) pollution or nuisance will not occur and (b) the highest water quality consistent with maximum benefit to the people of the State will be maintained."
	CEC Monitoring	Requires implementation of a monitoring program for CECs and priority pollutants, consistent with recommendations from DDW.

- **Future (Potential).** For recycled water, endocrine-disrupting chemicals and other compounds of emerging concern (CECs) are most likely to be regulated in the future. The recycled water p olicy highlights CECs as a potential issue for recycled water. While there are no current regulations for these constituents in recycled water, in accordance with the Recycled Water Policy, the State Water Board convened a science advisory panel (Panel) to guide the future monitoring of CECs in recycled water. The Panel developed a report that recommended ways to monitor for specific CECs in recycled water used for groundwater recharge reuse.

Stormwater. Summarized below are the current and future projected regulations for stormwater quality and quantity.

- **Current.** In cooperation with the federal EPA, the SWRCB has issued stormwater permits under the NPDES program. The City is a co-permittee, along with nine other cities and the Ventura County Watershed Protection District (VCWPD), for the MS4 NPDES permit issued by the California Regional Water Quality Control Board (RWQCB). The current MS4 permit was issued on July 8, 2010 (Permit CAS004002, Order No. R4-2010-0108). Pursuant to the permit, VCWPD has developed a countywide Stormwater Quality Management Plan that includes management measures/best management practices (BMPs).

  Ventura County, through the use of a stormwater ordinance, also regulates stormwater quality in the County. The Ventura County Stormwater Ordinance (Ordinance No. 4142) prohibits non-stormwater discharges into County stormwater facilities and seeks to reduce pollutants in stormwater to the maximum extent practicable. Each co-permittee is responsible for adopting and enforcing stormwater pollution prevention ordinances, implementing self-monitoring programs and BMPs and conducting applicable inspections.

  Within Ventura County are a number of water bodies with TMDLs. The City of Oxnard is a participating party in the Santa Clara River Bacteria TMDL and implements the Harbor Beaches TMDL on its own. Santa Clara River Bacteria TMDL went into effect in March 2012. The TMDL Implementation Plan is currently being developed through an agreement among the County of Ventura and the cities of Fillmore, Oxnard, Santa Paula, and Ventura and is known as the Ventura County Watershed Protection District (VCWPD). In addition, the same parties have developed the receiving water monitoring plan.

  The Harbor Beaches TMDL went into effect in December 2008, and dry and wet weather implementation plans were submitted in 2009 and 2010. The City has implemented, and continues to implement, BMPs aimed at reducing sources and transporting bacteria into the receiving waters at Kiddie and Hobie Beaches.

  The Federal Emergency Management Agency (FEMA) administers the National Flood Insurance Program. To ensure compliance with the National Flood Insurance Program, communities must adopt a floodplain management ordinance addressing construction and habitation in flood zones. Ventura County adopted their Flood Plain Management Ordinance (Ordinance 3741) in 1985. Since then, several revisions have been made, with the latest ordinance adopted in 1990 (Ordinance 3954). The ordinance addresses the risks of development within the floodplain and includes a list of prohibited discharges, exemption procedures, and requirements for construction and permitting.

- **Future (Potential).** In January 2015, the VCWPD submitted their report of waste discharge (ROWD), which applies the renewal of waste discharge requirements set forth in the current

order (Order No. R4-2010-0108). While the provisions of the next permit are unknown, the VCWPD is anticipating that it will be based on the MS4 Permit for Los Angeles County. The VCWPD ROWD includes proposed recommendations for changing or modifying specific provisions of the Los Angeles County Permit (VCWPD, 2015), and the justification for these recommendations for the purpose of the VCWPD permit renewal process.

At the statewide level, California Stormwater Quality Association (CASQA) (2015) outlined their strategic visions and goals for stormwater management to achieve the goals of the Clean Water Act. For future regulations, CASQA identified the need for stormwater to be considered a non-point source rather than a point source and for regulations related to stormwater capture and use as a resource.

1.6 Purpose and Scope of this EIR

The California Environmental Quality Act (CEQA) requires every proposed project in the state of California to be examined for potential effects on the environment. The PWIMP proposes construction and operation activities within the City of Oxnard and unincorporated areas of Ventura County. Project elements include the expansion and upgrade of existing facilities and the construction of several new facilities within the Oxnard Plain in two phases. As the Lead Agency, the City has determined that the proposed project has the potential to have a significant effect on the environment. Section 15165 of the CEQA Guidelines requires that, "where individual projects are, or a phased project is, to be undertaken and where the total undertaking comprises a project with significant environmental effect, the Lead Agency shall prepare a single program EIR for the ultimate project as described in section 15168." Because this is a phased project, this Program Environmental Impact Report (PEIR) has been prepared to provide a comprehensive environmental analysis of construction and operation activities associated with elements of the PWIMP as a whole. However, many specifics of the individual projects within the overall PWIMP are not known at this time. Therefore, this PEIR provides a very general analysis instead of a project specific level of effort. As such, additional individual environmental documentation (i.e. Addendums, Categorical Exemptions, Initial Study/Mitigated Negative Declaration or Project Specific EIRs) will likely be required as projects are implemented.

Environmental Review Process. This PEIR has been prepared in accordance with CEQA. Guidance for preparation of this document was obtained from the CEQA Guidelines (State of California, 2002), City of Oxnard *2030 General Plan* (2011), City of Oxnard *Threshold Guidelines* (2017), *Ventura County General Plan Goals, Policies, and Programs* (2014), *Ventura County Initial Study Assessment Guidelines* (2014), and, as necessary, criteria of specific resource agencies and federal state regulations. This PEIR will be used by various local and state agencies in their consideration of actions required to: (1) approve, (2) approve with conditions or modifications or (3) deny the proposed project. The PEIR is intended to provide the public, agencies, and decision makers with a comprehensive analysis of:

- Components of the Proposed Project
- Potential environmental impacts of the Proposed Project
- Mitigation measures to avoid or reduce potential impacts
- Feasible alternatives to avoid or reduce identified significant impacts

CEQA encourages incorporation of information by reference as a means of shortening EIRs. This PEIR, therefore, incorporates reference information from relevant studies, as appropriate. The level of technical

detail, evaluation, and analysis herein is consistent with CEQA and is sufficient to provide an understanding of potential impacts. The PEIR is the first phase of the process for issuance of various permits or approvals for the Proposed Project. The second phase, portions of which may occur concurrently with the PEIR, involves preparation of appropriate applications for permits and approvals for Phase 1. Requirements that are anticipated for these permits are considered in this PEIR. The third and final phase is public and agency review of permit applications, development of specific permit conditions, and issuance of permits by regulatory agencies. This phase may result in minor modifications of the Proposed Project to meet various agency requirements or permit conditions.

For this analysis, we have reviewed prior and relevant existing technical and environmental documentation to assess the potential impacts of implementing the Proposed Project on endangered/threatened species, public health or safety, natural resources, regulated waters, and cultural resources, among others, to include and address specific issues associated with CEQA. This document focuses on the potential physical environmental issues associated with implementing the Proposed Project as it is currently defined and as presented in Section 2 – Project Description of this CEQA EIR document. For any potentially significant impact(s) identified, we have identified proposed mitigation measures and strategies to attempt to avoid and/or reduce those impacts to less-than-significant levels. The information in this CEQA EIR document is presented to assist the City and other decision makers of this concept to understand what the major potential physical environmental impacts are of constructing and operating the Proposed Project. Summarized below is an overview of the CEQA Process.

Notice of Preparation. In accordance with CEQA Guidelines, the City prepared a Notice of Preparation (NOP) of an EIR and published it on July 27, 2016 (SCH #: 2016071078). The NOP was circulated to the public, local, state and federal agencies, and other interested parties to solicit comments on the Proposed Project during the 30-day comment period.

During the scoping period, the City held a series of two (2) scoping meetings in the City of Oxnard to discuss the proposed project and to solicit public input as to the scope and content of this EIR. Scoping meetings were held on August 24, 2016. The NOP, the NOP Presentation, and all of the comments received are available for review in Appendix B.

Draft PEIR. This document constitutes a CEQA Program-level EIR, including site-specific impacts and mitigation analysis for the Proposed Project as it applies to implement the PWIMP. In addition, this Draft PEIR contains a description of the regulatory context, the environmental setting, identification of project impacts, mitigation measures for impacts found to be significant, and an analysis of project alternatives.

Public Review. This Draft PEIR document is being circulated to local, state, and federal agencies as well as to interested organizations and individuals who may wish to review and comment on the report and Proposed Project. The Public Draft PEIR is being circulated for a 45-day public review period, starting on July 15, 2019 and ending on August 30, 2019. The City will hold a public hearing on the Draft PEIR during the 45-day public review period.

Date:	August 15, 2019
Time:	7:00 pm
Location:	City of Oxnard City Council Chambers 305 West Third Street Oxnard, CA 93030

During this review period, **written comments will be received from July 15, 2019 through, but no later than 5p.m. on August 30, 2019,** by the City at the following address:

Kathleen Mallory, Planning & Sustainability Manager
City of Oxnard
214 "C" Street
Oxnard, CA 93030
kathleen.mallory@oxnard.org

Final PEIR and PEIR Certification. Written and oral comments received on the Draft PEIR will be addressed in a Response to Comments document. The Draft PEIR and changes and corrections to the Draft PEIR will result in a Final PEIR. After review of the Proposed Project and the Final PEIR, the City, at a public hearing, will decide whether to certify the Final PEIR and whether to approve or deny the Proposed Project or any identified and evaluated alternative contained within this PEIR.

The City may still approve the Proposed Project (or Alternative) even though significant impacts identified in the EIR cannot be mitigated to less-than significant levels. However, the City must state in writing the reasons for its actions/decision in a *Statement of Overriding Considerations* that also must be included in the record of the Project approval and mentioned in the Notice of Determination (NOD) (CEQA Guidelines Section 15093[c]).

Mitigation Monitoring and Reporting Program. CEQA Section 21081.6(a) requires lead agencies to "adopt a reporting and mitigation monitoring program for the changes to the project which it has adopted or made a condition of project approval in order to mitigate or avoid significant effects on the environment". The specific "reporting or monitoring" program required by CEQA is not required to be included in the PEIR. Throughout the PEIR, however, mitigation measures must be clearly identified and presented in language that will facilitate establishment of a monitoring and reporting program.