

R-2 *County of Ventura Public Works Department Transportation Division, Nazir Lalani*

October 30, 2008

Mr. Jack Collins
Resource Specialist
Bureau of Reclamation
1243 'N' Street
Fresno, CA 93721

**SUBJECT: COMMENTS ON THE DRAFT EIS RELEASED FOR LAKE CASITAS
RECREATION AREA RESOURCE MANAGEMENT PLAN**

Dear Mr. Collins:

R-2-1

We appreciate the opportunity to comment on Lake Casitas Draft Resource Management Plan (RMP)/Environmental Impact Statement (EIS). As you may be aware, the County of Ventura Public Works Agency has jurisdiction over the 1.69 miles of public road in the Open Space Lands. These public roads are comprised of portions of Santa Ana Road (1.07 miles), Avenal Street (0.32 miles), and Noguera Avenue (0.3 miles). In keeping with the objectives expressed in the RMP, we would like to recommend to our Board, at the earliest opportunity, that the County's interest in these public roads be vacated. Upon vacation of the public easement, the road easement would revert to the underlying property owner, the Bureau of Reclamation. The roads could then be used in accordance with the RMP without the encumbrance of a public road easement. Private access easements can be granted by Reclamation to accommodate the remaining lifetime leases and any others with existing access rights. The area then can be gated and fenced to prevent it becoming an attractive nuisance. If it is desirable to retain public access using the existing roads, the County can reserve an easement for the operation of vehicular and non-vehicular trails and convey that easement to the Bureau in accordance with section 8340(d) of the Streets and Highway Code.

R-2-2

The developments identified in Alternatives 1, 2, and 3 have the potential to generate additional traffic on State Route (SR) 33 in the Casitas Springs area, which may not be consistent with County General Plan (GP) Policy 4.2.2.4(b). According to the County GP (Ojai Area Specific Portion), if a project generates one or more peak-hour trips AM southbound or PM northbound on SR 33 between the northerly end of the Ojai Freeway and the City of Ojai, a significant adverse impact will occur. The peak hours on SR 33 are 6:30 a.m. to 9:00 a.m. (southbound) and 3:30 p.m. to 6:30 p.m. (northbound). The subsequent environmental documents should evaluate if the proposed developments will have a significant adverse specific impact on SR 33, and mitigate these impacts to less than significant levels, if there are any.

Furthermore, the cumulative impact from proposed developments when considered with the cumulative impact of all other approved (or anticipated) development projects in the County could be significant. To address this impact of traffic on the Regional Road Network, Ventura County Traffic Impact Mitigation Fee (TIMF) Ordinance 4246 and GP Policy 4.2.2 require that the Transportation Department of the Public Works Agency collect a TIMF from the proposed

Mr. Jack Collins
Bureau of Reclamation
October 30, 2008
Page 2

- R-2-2, Cont.** | developments. With payment of the TIMF, the level of service and safety of the existing roads would remain consistent with the County's GP. The proposed developments might be also subject to the Reciprocal Traffic Mitigation Agreement between the City of Ojai and the County of Ventura.
- R-2-3** | It is also recommended that proposed developments identified in the three alternatives, should include improvements to bicycle access to Lake Casitas.
- R-2-4** | Lastly, we propose that the comments and recommendations submitted be included and addressed in the Final Resource Management Plan/Environmental Impact Statement.

Should you have any questions regarding the above, please call me at (805) 654-2080.

Very truly yours,

Nazir Lalani,
Deputy Director
Transportation Department

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Responses to Comment R-2

R-2-1

It is in the best interest of the public to maintain the roads in the Open Space Lands as public right of way.

The Ventura County General Plan (last amended on September 9, 2008) states that the minimally acceptable level of service (LOS) for SR 33 between the north end of Ojai Freeway and City of Ojai is LOS E. According to the County of Ventura Public Works Agency Transportation Division "SR 118 and SR 33 Procedures for Initial Screening" (Revised September 2007), there are segments of SR 33 between the end of the freeway and the City of Ojai that operate at LOS F during peak-hour periods in the peak direction.

The Ojai Valley Area Plan (last amended in November 15, 2005) mentions that SR 33 shall be limited to two lanes between Oak View and the City of Ojai. Therefore, there are no plans to increase the numbers of lanes on that section of SR 33. In addition, the plan states that SR 33 south of Oak View might increase the number of lanes so as to accommodate the traffic

projected to occur under the City of Ojai General Plan. The plan also states that modification to SR 33 would be required in the vicinity of Casitas Springs. However, there is no other mention of increasing the number of lanes for SR 33 south of Oak View or any modifications to SR 33 in the vicinity of Casitas Springs in the South Coast Association of Governments (SCAG) 2008 RTP or the SCAG 2008 RTIP.

Because no plans exist to increase the numbers of lanes on the already heavily impacted SR 33, Reclamation has included the following two mitigation measures in the RMP (Section 4.10.7):

- Mitigation TR-2a. This measure will direct visitors to use the alternative route from Ojai Freeway (SR 33) to Casitas Vista Road to Santa Ana Road. The mitigation will include posting of signs with the help of Ventura County on SR 150 and SR 33, requiring visitors to take the alternative route.
- Mitigation TR-2b. On remaining sections of SR 33, it should be noted that traffic impacts should not be applicable because visitors to Lake Casitas will be traveling opposite to the peak traffic direction at peak hours. Visitors will be traveling northbound during the morning peak hours (6:30 AM to 9:00 AM) and will be traveling southbound during the evening peak hours (3:30 PM to 6:30 PM).

Mitigation Measures TR-2a and TR-2b will also be enforced at the Lake Casitas entrance and exit, which will direct extra traffic to Santa Ana Road.

See the changes to the text in Sections 4.10.7.4 and 4.10.7.5 regarding Mitigation Measures TR-2a and TR-2b.

R-2-2

The County of Ventura “Initial Study Assessment Guidelines” (October 2008) states that all projects that generate traffic would contribute to cumulative traffic impacts and would be required to pay the County Traffic Impact Mitigation Fee (TMIF). The Lake Casitas RMP/EIS is a program-level document, and the available information about traffic flow over the planning period is insufficient. When each project is funded and planned, a project-level document will be prepared and the traffic impacts will be assessed. At that time, it will be determined whether individual projects would be responsible for the TMIF.

R-2-3

Text was added to the Final EIS in Section 2.5.3 (fifth bullet) as recommended in the comment.

R-2-4

The comments received on the Draft RMP/EIS are presented in this appendix.

R-3 Environmental Coalition, Janis McCormick



October 31, 2008

Mr. Jack Collins
Resource Specialist
United States Department of the Interior
Bureau of Reclamation
1243 'N' Street
Fresno, CA 93721

Sent via FAX and USPS

Subject: Casitas Lake Recreation Area Resource Management Plan
Draft Environmental Impact Statement - June 2008

Dear Mr. Collins:

Thank you for providing the Environmental Coalition of Ventura County (EC) with the draft Lake Casitas Resource Management Plan Environmental Impact Statement (RMP/EIS). We would also like to thank the Bureau of Reclamation for extending the public review and comment period until October 31, 2008. EC is deeply concerned about impacts that may occur from this project that have not been identified as major or not discussed at all in the text of the RMP/EIS. Examples of our concerns are as follows:

1. The Red Mountain Fault runs under Casitas Dam and reservoir. The Red Mountain Fault is considered to be an active reverse thrust fault and is capable of a maximum credible earthquake of magnitude 7.5 (USGS 1987, Campbell, 1991). When the Bureau designed the Casitas Dam Seismic Modification Project they decided not to drain Lake Casitas and remove the soils that are subject to liquefaction under the upstream shell of the Dam (Final Environmental Assessment Casitas Dam Seismic Modernization Project incorporated by reference). Soils subject to liquefaction are still present under the upstream shell of Casitas Dam that may cause the Dam to fail if there is a large earthquake on the Red Mountain Fault or the San Andreas Fault.

R-3-1

In the RMP/EIS Figure 3-3-5 the map identified as "Major Known Faults" contains a line outside the identified project area identified as "Red Mountain." The Red Mountain Fault is not mentioned in the written text of the RMP/EIS. Figure 3-3-5 should be revised showing the location of the Red Mountain Fault inside the project area where it dips under the Casitas Dam and Bureau lands. The written text of the RMP/EIS sections should contain the potential for fault rupture, ground shaking and Casitas Dam foundation liquefaction during large earthquakes that could result in the failure of the embankment and also discuss the potential for dam inundation.

Ground shaking from other active or potentially active faults in the area, including the San Andreas Fault, could result in structural damage to the Casitas Dam and recreation areas. The active faults may cause significant safety consequences for higher concentrations of visitors, boaters and employees that will be exacerbated if some of the more intensive uses of the RMP proposals are chosen as the preferred project.

EC suggests that the smallest printing on the "Figure" pages be enlarged and use more color contrast so that a magnifying glass is not required to read the maps. Also, the unnamed surface fault in the vicinity at the top of Lake Casitas Dam has not been identified in the RMP/EIS or in Figure 3-3-5.

R-3-2

2. No analysis or discussion was provided in the RMP/EIS regarding greenhouse gas emissions and global warming and EC requests it be provided in a redrafted and recirculated document.

POST OFFICE BOX 68 VENTURA, CALIFORNIA 93002

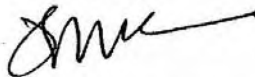
Appendix E

Responses to Comments on the Casitas RMP/EIS

RMP/EIS Casitas Lake
October 31, 2008
Page 2

- R-3-3 3. No details are provided in the RMP/EIS regarding the size of the proposed amphitheater. In a redrafted and recirculated RMP/EIS we request that a maximum size be identified so that impacts on air quality, roads, traffic, biological resources including impacts to wildlife from nighttime lighting and noise can be evaluated.
- R-3-4 4. There is a newly described rare plant, *Navarretia ojaiensis* and one population occurs on Bureau lands on a hill just north east of Casitas Dam according to David Magney, environmental consultant. This plant, although not formally listed, is considered a rare and endangered species by the California Native Plant Society and the California Department of Fish and Game. This new information should be included in the RMP/EIS and mitigations provided.
5. The air quality section lacks sufficient information for the public to make an informed comment. There is no mention in the document that Ventura County is a serious ozone non-attainment area according to the US Environmental Protection Agency under the Federal Clean Air Act. The document completely lacks any analysis for reactive organic compounds and nitrogen oxides emissions which are the known precursors of ozone.
- R-3-5 Lake Casitas is located in the Ojai Valley Planning Area. It is surrounded by mountains that trap pollution in the air basin. The Ventura County Air Pollution Control Board has adopted a five pounds per day threshold of significance for nitrogen oxides and a 5 pound per day threshold for reactive organic compounds and determined it will individually and cumulatively have a significant adverse impact on air quality in the Ojai Valley. (*Ventura County Air Quality Assessment Guidelines*, Chapter 5, Estimating Ozone Precursor Emissions presents procedures for estimating project emissions, herein incorporated by reference). It is possible that increases in vehicular trips to Lake Casitas in Alternative 2 and Alternative 3 may cause significant air quality impacts. This document should spell out the increased amounts of land and water traffic expected from Alternative 2 and Alternative 3 so that the cumulative impacts can be identified and mitigation measures provided at the earliest possible time.
6. The impacts on scenic resources from increased artificial nighttime lighting, paving, parking and additional glare from increasing recreational vehicle spaces has not been addressed. The proposed conversion of the undeveloped and natural Lakeside Group Camp to accommodate large recreational vehicles will increase glare and nighttime artificial light which has not been evaluated or mitigations offered.
- CONCLUSION AND RECOMMENDATIONS**
- R-3-6 There are significant omissions in the RMP/EIS that need to be rectified. EC requests that the document be redrafted with information that is absent and recirculated as a draft in a form that can more easily be read and understood by the public.

Sincerely yours,



Janis McCormick, President
(805) 640-0124

c: Mr. Michael Paul Jackson, Area Manager, Bureau of Reclamation, South-Central California Area
Mr. Steve Kellogg, Vice President, URS Corporation

Responses to Comment R-3

R-3-1

In Comment R-3-1, four discussion items are presented relating to the seismic hazard to Casitas Dam represented by the Red Mountain fault. We have addressed these items below:

- Our review of published maps (Jennings, 1994) indicates that the trace of the Red Mountain fault presented on Figure 3-3-5 is correctly located and does not require revision.
- At its closest point, the California Geologic Survey map of the Red Mountain fault trace is approximately 1.9 miles southeast of the dam site. Although the north-dipping thrust plane could be inferred to extend under the dam at depth, in our opinion, the potential for this fault to rupture at the dam site is negligible.
- We agree that Casitas Dam is potentially subject to severe seismic loading. However, based on our review of the published literature, the maximum credible earthquake on the Red Mountain thrust fault is a magnitude 7.0 (Mw) (O'Connell, 1999, Woodward-Clyde, 1998), and is not 7.5 as indicated in the comment.
- We agree that a series of studies that Reclamation conducted in 1998 concluded that the alluvial foundation of Casitas Dam was susceptible to liquefaction in the event of an earthquake, and that damage resulting from this liquefaction could lead to failure of the dam (Wilson, 1998a, Woodward Clyde, 1998). The result of these studies was the construction of three separate mitigation measures to improve the seismic stability of the dam. These measures were completed in November 2000 and consisted of the following:
 - (1) Stabilizing the downstream slope of the dam by excavating a massive shear key down to bedrock, and backfilling this excavation with engineered fill
 - (2) Buttressing the downstream portion of the dam by constructing an earthen berm on top of the shear key
 - (3) Placing additional earth material on the downstream face of the dam to widen the dam crest from 40 to 100 feet
- These measures acted to provide resistance to liquefaction-induced movements within the downstream foundation alluvium, buttress the downstream portion of the dam, and prevent the catastrophic release of the reservoir that could potentially result from instability of the upstream slope. Directly stabilizing the upstream slope was determined to be unfeasible, as this would require draining of the reservoir. Two- and three-dimensional post-liquefaction analyses and finite-difference deformation analyses were employed to demonstrate the seismic stability of the new dam configuration (URS/Greiner Woodward-Clyde, 1999).
- In the unlikely event that a seismic event would threaten the seismic stability of the new dam configuration, the primary safety threat would be to downstream receptors and not recreation users at lake level.

R-3-2

See the response to Comment F-1-7.

R-3-3

In a programmatic planning document, it is not appropriate to estimate a maximum size of a possible amphitheater without a specific location identified. When and if an amphitheater project is tiered from this programmatic EIS and advanced for implementation, the design alternatives (shaped by public input) will be evaluated for environmental impacts including, but not limited to, air quality, traffic, roads, and biological resources. As stated previously, any of the actions under the proposed Action Alternatives are subject to available funds and public demand.

R-3-4

The *Navarretia ojaiensis* population in the Plan Area is now referenced throughout the RMP/EIS document. All relevant sections (3.4.6.1, 4.4.5.4, 4.4.7., Table A-1, Table A-4) describing sensitive biological resources and mitigation for potential impacts to sensitive biological resources have been updated to reflect the presence of the plant. Proposed mitigation includes fencing the known population and designing all project-level plans to avoid impacts to the population.

R-3-5

Quantification of Criteria Pollutant Emissions

Ventura County is designated in “serious” non-attainment for the 8-hour ozone standard. Because ozone is a secondary pollutant, projected vehicular emissions can be compared to thresholds for the ozone precursors: NO_x and ROCs, to determine whether the project will have a significant effect on the environment. As described in the Response to Comment R-1-40, the estimated vehicle emissions will be less than the General Conformity de minimis thresholds, but the data are insufficient to compare vehicle emissions to the VCAPCD significance thresholds

R-3-6

The primary scenic resources identified in the Lake Casitas Plan Area are characterized by mountain ridgelines and rugged canyons with the backdrop of the lake itself. All of these resources are dependent on daylight for viewing. Glare from additional RVs and more intensive camping would not affect these views. None of the public comments during scoping expressed concern regarding increased glare from recreational vehicles.

Appendix E
Responses to Comments on the Casitas RMP/EIS

R-4 *Ventura County Air Pollution Control District, Alicia Stratton,*



**Ventura County
Air Pollution
Control District**

669 County Square Drive
Ventura, California 93003

tel 805/645-1400
fax 805/645-1444
www.vcapcd.org

**Michael Villegas
Air Pollution Control Officer**

OFFICIAL FILE COPY

CODE	ACTION	SUBMITTER & DATE
452		
411		

October 29, 2008

VENTURA PROJECT

Mr. Jack Collins, Resource Specialist
Bureau of Reclamation
1243 "N" Street
Fresno, CA 93721

Subject: Review of Draft Environmental Impact Statement (DEIS) for the Lake Casitas
Recreation Area Resource Management Plan (RMP)

Dear Mr. Collins,

Ventura County Air Pollution Control District staff has reviewed the subject DEIS, which is a proposal for development of a Resource Management Plan to guide the management of natural resources and recreation at Lake Casitas in Ventura County, California. The RMP intends to ensure safe storage and timely delivery of high-quality water to users while enhancing natural resources and recreational opportunities; protect natural resources while educating the public about the value of good stewardship; provide recreational opportunities to meet the demands of a growing, diverse population; and ensure recreational diversity and the quality of the experience.

Section 3.2 of the DEIS addresses air quality issues. This discussion concludes that development of any of the three alternatives described above would result in only minor adverse impacts from particulate emissions (Section 4.2.3.2). This conclusion regarding particulate impacts appears to be based only on the seasonal creation of dust clouds and timing of low water levels and visitor levels. No other evidence is presented substantiating this conclusion.

R-4-1

The DEIS air quality analysis does not address ozone, Ventura County's most serious air pollution problem. The US Environmental Protection Agency has classified Ventura County a serious ozone non-attainment area under the Federal Clean Air Act. Moreover, Ventura County is a severe ozone non-attainment area for California's more stringent state ozone standards.

Therefore, we recommend the air quality analysis be expanded to evaluate potential air quality impacts from maximum visitor usage in Alternatives 1 and 2. Specifically, the air quality assessment should consider reactive organic compound and nitrogen oxide emissions from all project-related motor vehicles and construction equipment. Additionally, the air quality assessment should consider potential impacts from fugitive dust, including PM10, that will be generated by construction activities.

VENTURA PROJECT

Classification ENV-6-00
Project VENT
Control No. 08076049
Folder ID. 1034260

Appendix E

Responses to Comments on the Casitas RMP/EIS

Mr. Jack Collins/Lake Casitas Recreation Area RMP
October 29, 2008
Page 2 of 2

R-4-2

District staff recommends that this chapter be revised to be in accordance with the 2003 *Ventura County Air Quality Assessment Guidelines* (2003 Guidelines). A copy of the 2003 Guidelines can be accessed from the downloadable materials section of the APCD website at www.vcapcd.org. If project-related air quality impacts are deemed significant, appropriate mitigation measures should be identified and included in the final DEIS. The EIS preparer should be aware that Ventura County APCD has regulations that would help to minimize project particulate impacts: APCD Rule 55, Fugitive Dust, Rule 51, Nuisance and Rule 50, Opacity.

R-4-3

We also recommend the DEIS be expanded to address and analyze potential global climate change impacts of the project. This Analysis should quantify the project's direct and indirect greenhouse gas emissions (GHG), and make a determination as to whether the project GHG emissions would be a cumulatively considerable contribution to global climate change. A reasoned rationale for the determination should be included as well.

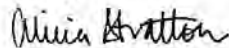
R-4-4

Furthermore, although not a NEPA issue, this project appears to be subject to the requirements of the federal General Conformity regulation. Conformity is defined in the Clean Air Act as conformity to an air quality implementation plan's purpose of eliminating or reducing the severity and number of violations of the national ambient air quality standards, exacerbate existing violations, or interfere with timely attainment or required interim emission reductions towards attainment. Section 176(c) of the Clean Air Act requires the EPA to develop criteria and procedures for determining the conformity of transportation and nontransportation (general) projects that require federal agency approval or funding with the applicable air quality plan.

On November 23, 1993, a rule entitled "Determining Conformity of General Federal Actions to State or Federal Implementations Plans" was published in the Federal Register. This rule states that a federal agency may not "engage in, support in any way or provide financial assistance for, license or permit, or approve any activity which does not conform to an applicable implementation plan. The air quality assessment should include a summary of the federal general conformity rule, which actions(s) related to the project may require a conformity analysis to be performed, and which agencies will likely be involved with the conformity determination(s).

If you have any questions, please call me at (805) 645-1426.

Sincerely,



Alicia Stratton
Planning and Monitoring Division

Responses to Comment R-4

R-4-1

Potential Air Quality Impacts from Maximum Visitor Usage

The Lake Casitas Resource Management Plan (RMP) is a program-level document; therefore, construction emissions have not been quantified. When each project is funded and planned, a project-level document will be prepared and construction emissions will be quantified at that time. Even though construction emissions are not quantified at this time, a dust mitigation plan has been prepared as described in Response to Comment F-1-2 to address potential impacts from PM₁₀ and PM_{2.5} emissions.

A description of criteria pollutant emissions from future motor vehicle usage is presented in the response to Comment F-1-1. Table 4.2-1 presents the results of the criteria pollutant emissions.

R-4-2

See the response to Comment F-1-2.

R-4-3

See the response to Comment F-1-7.

R-4-4

See the response to Comment F-1-1.

E.4 COMMENTS FROM LOCAL AGENCIES AND ORGANIZATIONS

L-1 Pat Baggerly, Environmental Coalition Ventura

LAKE CASITAS RMP and EIS

MY NAME IS PAT BAGGERLY / ENVIRONMENTAL COALITION
I LIVE IN DJAI NEIGHBORHOOD IN VENTURA [COUNTY].

QUESTIONS/COMMENTS ON THE LAKE CASITAS RMP and EIS

- L-1-1 WHY ISN'T THERE ANY DISCUSSION
OF GREEN HOUSE GAS EMISSIONS IN THE
EIS?
- L-1-2 WHY DID THE FEDERAL REGISTER NOTICE
SAY THE COMMENT PERIOD ENDS ON
SEPT. 26, 2008 AND OTHER PUBLIC NOTICES
SAY SEPT. 25, 2008?

ADDITIONAL COMMENTS MUST BE RECEIVED by the Bureau of Reclamation no later than close of business Thursday, September 25, 2008.

Send your comments (delivery receipt and signature requested) to:

Mr. Bob Epperson, Project Manager
Bureau of Reclamation
1243 'N' Street, Fresno, CA 93721

OR - Email your comments (delivery receipt option selected) to:

repperson@mp.usbr.gov

Responses to Comment L-1

L-1-1

See the response to Comment F-1-7.

L-1-2

The discrepancy in dates was a printing/editorial error. The intended closing date of the comment period was September 26, 2008.

L-2 Ventura Audubon, Jack Gillooly

LAKE CASITAS RMP and EIS

MY NAME IS Jack Gillooly, Ventura Audubon

I LIVE IN Ojai NEIGHBORHOOD IN [COUNTY].

QUESTIONS/COMMENTS ON THE LAKE CASITAS RMP and EIS

-- The draft RMP/EIS refers to a "Public Scoping Report (Reclamation 2003)".
If copy is available for review, please send to my attention,
2466 Hectilje Canyon Road, Ojai, CA 93023. If not available,
please explain (to same address/recipient).

L-2-1

-- Was RMP/EIS developed in conformity of Ventura County General Plan
guidelines and standards - which was developed to comply
with state & fed. standards? Specifically, air quality
guidelines for discretionary development in VCGP should be
considered with alternatives.

L-2-2

-- Cumulative impacts of all potential "enhancements and expansion"
should be evaluated in context with existing conditions & impacts.

ADDITIONAL COMMENTS MUST BE RECEIVED by the Bureau of Reclamation no later than close of business Thursday, September 25, 2008.

Send your comments (delivery receipt and signature requested) to:

Mr. Bob Epperson, Project Manager
Bureau of Reclamation
1243 'N' Street, Fresno, CA 93721

OR - Email your comments (delivery receipt option selected) to:

repperson@mp.usbr.gov

Response to Comment L-2

L-2-1

See the response to Comment R-1-40 for a discussion of conformity with air quality standards.

L-2-2

In Section 4, cumulative impacts are discussed at the end of each resource impact discussion where applicable. For example, see Section 4-4.8 for Biological Resource cumulative impacts.

Responses to Comments on the Casitas RMP/EIS

L-3 Ventura Ear, Nose and Throat Medical Group, Inc., John Edison

VENTURA EAR, NOSE & THROAT MEDICAL GROUP, INC.

J.M. EDISON, M.D., F.A.C.S.

3003 LOMA VISTA ROAD, SUITE A

VENTURA, CALIFORNIA 93003

648-3081 648-4040

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September 19, 2008

Mr. Jack Collins
Bureau of Reclamation
1243 N Street
Fresno, CA 93721

Dear Mr. Collins:

This letter is to speak in favor of creating hiking trails around Lake Casitas and trails to access Los Padres National Forest from Highway 150.

As you may know, there are already trails or access roads around the south end of the lake, but the public is not allowed access to them. Now that the parking area near the dam has been closed for "security" reasons, one cannot even get to the south side of the lake.

L-3-1

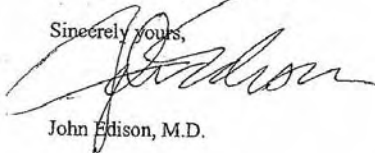
Hiking trails are certainly of negligible environmental impact and a very inexpensive way to allow public recreation in the form of walking and hiking.

I could easily recruit volunteers and could create and sign these trails at no cost to the government.

I therefore, would encourage you to allow the public to hike and walk around Lake Casitas and also access Los Padres across the Lake Casitas property.

Thank you for your interest.

Sincerely yours,



John Edison, M.D.

JE/llk/tmr/rva

cc: Elton Gallegly, Congressman 24th Dist.

Ernest J. Rischard, Ojai Land Conservancy

Responses to Comment L-3

L-3-1

The commenter's support for creating additional hiking trails is noted.

L-4 *Ventura Audubon Society, Jack Gillooly*

The Ventura Audubon Society, Inc.

P.O. Box 24198, Ventura, CA 93003 www.venturaaudubon.org

October 30, 2008

Mr. Jack Collins, Resource Specialist
Bureau of Reclamation
1243 "N" Street
Fresno, CA 93721

Re: Lake Casitas Draft Resource Management Plan / Environmental Impact Statement, June 2008.

Dear Mr. Collins:

Thank you for inviting comment from the Ventura Audubon Society (VAS), other stakeholder groups, and the general public. An RMP/EIS is long overdue in helping to guide operations at this important southern California reservoir and watershed. However, the broad scope of this document and lack of project details make it difficult, if not impossible, to assess the resource impacts as outlined in Section 4.

We understand that the RMP/EIS is meant to be a guiding document for future projects, and therefore the studies cited and impacts listed for any given proposal may be incomplete. The RMP itself states that individual projects may require additional review and impact analysis. However, it also states that "...some of the new recreational uses and most of the natural resource management actions identified in the RMP may not require additional environmental review" (Sec 4.4.3.1, 2.4.3.2). Since these "new uses and actions" are not identified, we must assume that any listed project may cite the RMP as satisfying NEPA and/or CEQA requirements—subject to the interpretation of the agency proposing the action.

Due to the lack of information for all projects in the RMP, it is our opinion that none of the listed proposals would meet NEPA/CEQA requirements utilizing this data alone—especially the recreation "enhancements" of Alternatives 2 and 3. We are concerned that future projects may be approved referencing only this document, e.g. that this RMP may be considered a USBR endorsement of any proposal listed, or others considered similar.

This and other Audubon concerns are further explained below.

Project descriptions. The proposed recreation additions, facility upgrades, and infrastructure improvements are entirely lacking in any description of size, scope, associated facilities, and other necessary details. As such, the "minor" resource impacts assigned are not justified by the minimal data presented.

**L-4-1,
Cont.**

For example, the construction and use of a lakeside amphitheater—misidentified as an “Infrastructure, Services/Facility Upgrade” in 4.1.5.3—has no discussion of size, parking, facilities, power and lighting requirements, noise levels, or any projected effects on local traffic, air pollution, and biological resources for the areas proposed. It is only minimally stated that this facility, combined with a host of other proposed recreation facilities, may cause “...minor to major adverse impacts.” The only mitigation proposed is to locate the amphitheater “...further from the shoreline,” causing only “...minor impacts to raptor foraging habitat” (4.4.5.2).

In previous CMWD documents, this facility has been described to seat multiple thousands. As such, operational impacts to many resources would be large and recurrent, e.g. *significant*. These impacts could not be mitigated to acceptable levels anywhere in the Lake Casitas Recreation Area and watershed. It is an incompatible use and should be removed from the RMP, and from any future consideration.

L-4-2

Existing Conditions. In this section, though existing conditions are stated, there is no quantifiable baseline data or discussion of current resource impacts from ongoing recreational pursuits at the lake, including impacts to water and air resources directly in or on the lake, its immediate vicinity, or to the wider community. A thorough baseline analysis of current conditions is needed as a starting point for assessing the compound effects of additional recreation or infrastructure components.

L-4-3

As one example, “Boat Fuel Discharges” 3.1.2.1 discusses the fuel discharges into the lake by 2-stroke engines, but states that no personal watercraft (with 2-stroke engines) are currently allowed or planned for the lake, and new regulations “...are designed to reduce emissions on marine engines.” There is no discussion of current or projected emissions of 4-stroke marine engines, and it is assumed emissions will decrease as 2-stroke engines are replaced—even though boating is expected to increase if Alternatives 2 or 3 are adopted. The regulations, though not described, would likely only apply to *new* engines, and there is no proposal to ban 2-stroke engines. This section is highly speculative since there is no data to support the assumptions.

L-4-4

Another example is presented in the Air Quality discussion (3.2). Various emission standards are stated for Ventura County, but there is little discussion and no data for current vehicle emissions at the lake or in the Ojai Valley, and no projected emissions for the probable increase in vehicle traffic with expanded recreation components at the lake. An associated paragraph in 4.2.3.1 states that “...none of the alternatives would result in levels of Park visitation high enough to create heavy and sustained traffic patterns that would produce major air quality issues.” This fails to recognize the Ojai Valley’s high summer ozone concentrations, that result in a low threshold for any increase in traffic, especially peak hourly or daily conditions, e.g. those that can be expected with amphitheater or lakeside events, expanded RV camping, boat emissions, and any additional recreational component that is likely to attract more visitors.

The RMP also does not recognize local traffic volume at the lake and in the Ojai Valley, such as feeder-road capacities and limitations. There is no discussion of Ventura County General Plan and/or VCAPCD air quality standards for discretionary development—as measured in vehicle-trips and allowable pollutant quantities—and no compliance is offered. In 4.2, mitigations are

L-4-4, Cont.	<p>suggested only for dust generated by vehicles in unpaved areas or new construction, and prescribed burns. Operational impacts are not addressed, thus no mitigations are offered.</p> <p>In 4.9.3, however, it is stated: “For all future growth, Reclamation and managing partner(s) will coordinate with Ventura County...to comply with guiding plans and policies. The objective of these actions would be to have no impact on the recreational experience for visitors; however, individual actions may impact user groups differently.” This last line appears to contradict the opening statement, offering that the objective of the RMP—no impacts—will not occur since user groups will be impacted (?)</p>
L-4-5	<p>This section also compares recreational offerings at Lake Casitas with nine other lakes/reservoirs in California. Unfortunately, there is no environmental review data for any component at any lake, no comparative water acreage and/or size of recreation areas, and no resource discussion—among other lacking data that might allow any kind of informed comparison. Additionally, very few of these lakes allow swimming or high-impact water sports, as proposed for Lake Casitas. As regards the amphitheater proposal for Casitas, only two “fireside theaters” are listed, with the one at Cachuma described in another passage as a “rustic amphitheater.” The Lake Casitas amphitheater, then, would apparently be the first modern amphitheater—with all associated facilities and impacts—among the listed California lakes.</p>
L-4-6	<p>In 3.9.6, a complex Water Recreation Opportunity Spectrum (WROS) scale is offered to assign number/letter ratings to Lake Casitas, with the ratings criteria only vaguely referred to. This renders the WROS incomprehensible and unverifiable, with no comparisons to other lakes, and how their recreation components conform to the scale. The WROS is also used to determine Boating Capacity in 4.9.2 and 4.9.5.3, but again, no criteria are offered.</p>
L-4-7	<p>Environmental Consequences. Overall, this section, like the others, is disturbingly spotty and lacking in any quantitative analysis of environmental effects. Under various resource headings, it may discuss some recreation additions while ignoring others, or consolidate many together and make broad statements that minimize impacts. Accordingly, improved management of certain resources is somehow traded for the negative consequences of added components. Some impacts are mitigated, but most are accepted ostensibly as “negative declarations,” even if they become “reduced impacts” after certain mitigations.</p> <p>Particularly deficient are the discussions of Water Resources (4.1), Air Quality (4.2), Biological Resources (4.4), and Cumulative Impacts (as addressed for some resources, but not others). Throughout, little if any verifiable data is cited to justify the minor or mitigated impacts given.</p> <p>Under Water Quality, increases in vehicle usage (including boats), stormwater runoff, lakeside RV camping and events, Main Island development, body contact issues, and open space impacts are barely described and always mitigated to minor or better, with very little methodology described and, again, no data cited.</p> <p>Air Quality – see Existing Conditions above.</p>

L-4-8

In the **Biological Resources** section, there is no discussion of breeding bird species and compliance with the Migratory Bird Species Act, which protects most bird species (as migrants) during their breeding season. The presence of species during breeding months, as noted in Table A-2 and Appendix B, indicates breeding activity during the January to September season recognized by CA Fish and Game, whose regulations limit disturbance during breeding season.

While a few “management improvements” for avian species are offered in Alternatives 3 and 4 and the breeding season is referred to, impacts resulting from the many new components are not referenced for the habitats that would be disturbed if the components are constructed.

L-4-9

In Appendix A, Table A-2, the listing for Great Blue Heron should include: “breeds in Plan Area,” as referenced in other RMP sections and Figure 3.4-6. The proposal in Alternative 3 to extend the Lake Shore Trail to surround the perimeter of the lake would likely disturb the lake’s largest heron rookery, and perhaps other rookeries depending on trail location—which is not mapped or described, and would be difficult for park personnel to monitor along most of its length. Other bird populations, protected as migratory or sensitive, would also be impacted by various proposals in Alternatives 2 and 3. Some populations likely are currently impacted by boat traffic and other operations, but have not been studied.

L-4-10

Although Biological Resources have been inventoried for species presence, and the maps in the “Figures” section identify locations of sensitive species and habitats, project locations are not clearly identified in the narrative, do not have a corresponding map, and are not overlaid on any other map, e.g. the inventory data and project locations have apparently not been cross-referenced in the RMP. The Planning Units map and WROS Management Zones for each Alternative also do not specify project locations. A comprehensive map is needed that identifies sensitive habitats and species, important animal use areas, and proposed project locations.

L-4-11

Another notable deficiency is the lack of relative abundance data for nearly all identified biological species including plants, birds, arthropods, mammals, amphibians, and reptiles. Only a few bird species in Appendix A include relative abundance. The sheer number of species identified in the surveys, however, indicates an amazingly diverse biological community that should be protected to the highest level of management, with disturbance kept to a minimum. Many of the proposed enhancements and expansions will only increase disturbance, regardless of the mitigations proposed, which offer no justifying evidence or probability of mitigation success.

L-4-12

A notable deficiency in Alternative 1 is the lack of improvements to current resource management practices—even though many minor impacts are noted (but not quantified), and it is stated that impacts are expected to increase with normal population growth. Mitigations have not been identified for current impacts, such as proposed for Alternatives 2 and 3.

L-4-13

In Biological Resources, Impacts Summary 4.4.7, it is stated: “Alternative 2 would impact natural resources the least because...the resource management measures included in the plan would offset these new impacts and result in fewer impacts compared to Alternative 1.” It is inconceivable that the many projects and actions proposed in Alternatives 2 and 3 could possibly have fewer impacts than the No Action Alternative 1, even with the improved management

- L-4-13, Cont.** practices and mitigations proposed in #2 & 3. The addition of an amphitheater and water skiing alone would have significant impacts that could not be mitigated.
- L-4-14** This points to a major problem for the three alternatives (Sec 2.5), e.g. a large imbalance in the number of proposals per Alternative. Virtually 80% of the proposed additions and impacts are in Alternative 2, defined as “Enhancement.” Most of the added recreational components in this alternative are clearly *expansions*, and are often stated as such (or paraphrased) in the listings. In Sec 2.7, a sampling of the narrative includes: “...the trail system in the Open Space Lands would be expanded by building new connector trails...a nature interpretive center is proposed...limited day use and an environmental education facility on the Main Island would be allowed...converting tent campsites to RV sites with associated road improvements...expand marina and boat ramp capacity...expand the water park...build a new amphitheater and parking area...expand the bike path south...expand the floating restroom”—to name a few.
- While the few additions in Alternative 3 are more sizable expansions—multi-use trail system, body contact in lake, water skiing, camping on the Main Island, most campsites RV-developed—most of those in Alternative 2 are far beyond *enhancements* as commonly defined, with enough impacts to question their stated mitigations and very little if any *cumulative* analysis.
- L-4-15** **Cumulative Impacts.** In Section Four, Environmental Consequences, there is no discussion of cumulative impacts in the introductory Impacts Summary 4.1.7, apparently because all impacts are mitigated to, at most, “minor.” However, some of the individual resource categories in the section do address cumulative impacts, but minimize or mitigate them without quantifiable projections. Although certain impacts may include management strategies that “reduce impacts,” as it is often termed, most cannot possibly mitigate to zero, necessarily resulting in cumulative impacts that are not quantified and often not addressed.
- L-4-16** In Biological Resources, Cumulative Impacts 4.4.8, the first paragraph notes increasing impacts from outside influences while the second paragraph notes increasing biological impacts resulting from Alternatives 2 and 3. It also notes that these cumulative impacts could be managed and/or mitigated under a framework that is part of these two alternatives, but not Alt 1 (though “minor” cumulative impacts are referred to).
- L-4-17** In the 4.9.7 Impacts Summary, various effects on different user groups are vaguely outlined, and Alternative 1 is summarily dismissed because it “...does not open up recreational opportunities...that many user groups would like to have.” It cites the Public Scoping Report (Reclamation 2007), which is not included or summarized in this document, yet referenced in vague statements of support for any given recreation component. Further on, it promotes Alternative 2 as providing “the best balance.” The final paragraph states: “The adverse impacts (summarized below) are based on the relative opportunity afforded to recreation users and the quality of the recreational experiences.” This statement appears to define “adverse impact” in terms other than actual resource degradation, e.g. it imposes an equation somehow trading more fun experiences for impacts. The final sentence, however, states: “With appropriate mitigation measures, most of the adverse impacts can be reduced.”

L-4-17, Cont.	<p>“Better management” and “reducing impacts” imply that many new impacts will be introduced if Alternatives 2 or 3 are adopted, albeit “reduced” impacts after mitigations. We believe these impacts can only accumulate, and some accumulations may be <i>significant</i>. It is unacceptable that the No Action alternative does not assess current impacts, nor propose mitigations or management plans for individual or cumulative impacts. All three alternatives should list probable cumulative effects, even if the individual impacts are considered “reduced” or “minor.”</p>
L-4-18	<p>Section 4 Summary. The individual impacts and mitigations discussed in the narratives for each resource category, and in Table 4.11-1, are seriously incomplete and not backed by any quantifiable data, rendering them as “opinions” that are highly speculative and unverifiable. The cumulative impacts are left unstated or minimized for each resource category, and there is no discussion of the sum total of the stated impacts of Alternatives 2 or 3.</p> <p>The final statement in 4.12—that there will be no significant irreversible damage to resources if the RMP is implemented—is entirely unjustified by any quantifiable data. There is no definition of the term “irreversible damage,” which could allow any level of damage since even “major damage” is usually reversible—but at what cost to resources and ratepayers? Since the list of proposed infrastructure and recreation components is so lengthy, there can be no other conclusion but that long-term negative consequences are probable, some of which individually or cumulatively would likely rise to the level of <i>significant</i>.</p>
L-4-19	<p>Original legislation, management contracts, and operating agreements. There is no discussion of the charter documents for the lake and recreation area beyond the stated provisions for delivery of water to area subscribers, and other vague statements seen in Sec 1.1 and 1.2. – e.g. there is no discussion of the original intent of the federal government to provide a level of recreational facilities, or the authority to use the lake and watershed for facilities and activities other than those that would collect and distribute water. There is also no discussion of the authority of BOR or CMWD to modify recreational facilities beyond the original intent, or to impact natural resources in the area to any level. Additionally, there is no discussion of management agreements and operational contracts between USBR, CMWD, USFS, and other current and potential managing partners.</p>
L-4-20	<p>USBR and CMWD roles. It is unclear which of the RMP proposals and/or actions are mandated by charter or operational agreement between the BOR and CMWD, what the roles of each agency are or will be, which agency assumes the responsibility and cost of construction and operation of the various facilities proposed, and how this document will implement and/or regulate the many new components. Previous management agreements between CMWD and BOR, and their basis in legislation or establishing documents, would be helpful in ascertaining guidelines for recreation at the lake. There is also concern that a new managing agency, Los Padres National Forest, will be assuming primary authority for operational and recreational uses of the Open Space Lands.</p>
L-4-21	<p>Watershed issues. Two particular proposals within Alternatives 2 and 3 present highly problematic recreational uses to a community that has repeatedly expressed its opposition to such uses: allowing recreation within Open Space Lands, and allowing body contact with lake waters.</p>

L-4-22

The **Open Space Lands** were acquired with the expressed intent of restoring them to a 100% natural condition, including removal of all structures and disallowance of any recreation—in order that the primary watershed waters flowing into the lake remain pristine and unpolluted. Allowing any form(s) of recreation or operational usage in this area would conflict with the stated mandate of the Reclamation Development Act of 1974 (2.7.2): “...the preservation of...fish and wildlife, and the environment.” To allow “...enhancement of public outdoor recreation,” as also stated in the Act, and to the extent proposed in Alternatives 2 and 3, would necessarily impact resources. The community is extremely concerned that allowing *any* recreation in this area will “open the door” to expanded uses, impacts, wildland fires, and/or extraction of resources—especially if the Forest Service becomes manager of this area under their current dictums.

L-4-23

The “expanded annual weed eradication efforts (moving and weed whacking) and selective use of herbicides” presented as management “improvements” in 2.7.2 are potentially destructive to the area’s vegetation. Mowing, weed whacking, herbicide usage, and prescribed burns—without active restoration—perpetuate the weed regime, which is easily ignited by errant recreational users (smoking, campfires, etc). With no ability to adequately monitor backcountry recreation, the community can expect accidental or arson-caused fires to threaten area housing tracts.

L-4-24

In Alternative 3, the addition of three separate trail systems in Open Space Lands for hikers, cyclists, and equestrians will create even more threat of fire, erosion, creek sedimentation, and other resource impacts—especially from equestrians, with no mitigations proposed for waste, non-native seed introduction, and erosion/sedimentation impacts.

L-4-25

Body contact with lake water is even more contentious in the community, and opposed by the majority of residents in the most recent proposal to introduce it to the lake. Any body contact is perceived, again, as “opening the door” to ever higher-impact body contact. The proposal in Alternative 3 of “limiting” body contact to water skiing is itself high-impact, due to boating speed, noise, and danger to slow or non-motorized watercraft (kayaks, canoes, rowboats).

Designated swimming areas are also problematic due to the lake’s current filtration and treatment system. A treatment upgrade would be extremely costly to the ratepayer, especially when added to the current and expected rise in water rates.

Ventura Audubon opposes any and all recreational usage of Open Space Lands and any body contact with lake water. Both are incompatible with the highest protection of the lake’s water and biological resources in the area.

L-4-26

Conclusion. After waiting nearly a decade for this Draft RMP/EIS, the Ventura Audubon Society is extremely disappointed in this document. Though we commend USBR efforts to come to some conclusion, it appears the length of the process has led to the RMP’s overriding lack of cohesion and considerable missing data, plus the many other inconsistencies noted here—which are only a sampling of the problems we found.

L-4-26,
Cont.

Recommendations.

1. Produce another Draft with enough information to allow proper review and impact analysis. Although it would lengthen the process, to certify this document without major changes will invite challenges to many of the proposed projects.

- The document should be split into separate RMP and EIS documents. As the integrated document presented here, the information is jumbled, difficult to cross-reference, often redundant or contradictory, and too minimal to afford any guided analysis.
- Projects in all Alternatives need some level of description corresponding to the resource impacts assigned, including—at minimum—size, scope, and associated facilities. Without description, the “environmental consequences” are unjustified and artificially minimized.

2. Adopt the No Action Alternative as “preferred,” with a qualification:

- If the document is certified and Alternative 1 is chosen, all management improvements offered in Alternatives 2 and 3 should be included. (Note: Alt 2 and 3 could not be considered without the required information as cited in this letter.)

3. Establish current baseline data to assess cumulative impacts of new projects.

- A study should be initiated to quantify the resource impacts of all current operations at and around the lake. The study should be concluded before any projects are proposed or constructed.

4. The Final RMP/EIS should clearly state that full description, review, and impact analysis—not this document alone—is required for NEPA/CEQA certification of all new recreation components, and all infrastructure improvements that increase in size or scope. Leaving it to the discretion of managing agencies can only lead to contentious issues that we would hope this document was meant to preclude.

Thank you for considering these comments. If you have questions or concerns, please contact me at: (805) 646-3867 or www.lporto@netzero.net. We look forward to your written reply.

Sincerely,

Jack Gillooly
Ventura Audubon Society
Board of Directors

cc: Mr. Robert Epperson; Mr. Michael Jackson

– mailed copy to follow.

Responses to Comment L-4

L-4-1

See the responses to Comments R-1-4, R-1-52, and R-3-3.

L-4-2

In Section 4, each resource area discussion contains a subsection addressing impacts common to all alternatives. These subsections address impacts that are common to the No Action and other alternatives. These impacts are those that are current (resulting from on-going recreational pursuits) and would occur with or without implementation of the RMP.

As stated in other responses above, this is a Tier 1 document and uses a programmatic approach to impact analysis. Many impacts are not quantifiable at this Tier 1 level and thus quantified baseline data would not be appropriate for impacts that cannot be quantified. Section 1602.16 of CEQ NEPA Regulations states that within the affected environment sections “data and analysis in a statement shall be commensurate with the importance of an impact.” The descriptions shall be no longer than is necessary to understand the effects of the alternatives.

L-4-3

See the response to Comment F-1-5. A 3-year phase out period of older non-compliant engines has been added to the Preferred Alternative (Alternative 2). See Table 2-2 and Section 4.1.7 in the Final EIS.

L-4-4

See the response to Comment R-4-1.

L-4-5

The intention of this discussion was to identify the types of recreational facilities at other recreational lakes in the region. It is not intended to justify or compare potential facilities to the alternatives presented in the Casitas RMP/EIS.

It is correct that the amphitheater would be unique relative to the offerings of other lakes in the region. That is why this regional setting is provided. It allows an overview of the region.

L-4-6

The WROS system discussed in this section has been used throughout California and has been well received. The WROS classifications applicable to Lake Casitas are described and shown in Figures 2-1, 2-3, and 2-4. Verification of these ratings has been certified by Aukerman and Haas, the developers of the WROS system.

Recommended boating capacity coefficients for WROS classification are shown in Table 4.9-1C (Aukerman and Haas). As explained in Section 4.9.2, these coefficients are based on safety, boat speeds, size, and other factors considering expert opinions, published literature, and professional judgment.

L-4-7

As stated previously, the RMP/EIS is a programmatic document that identifies a preferred alternative with proposed management actions. It is a guidance document from which management strategies with managing partner(s) will be developed. Quantifiable environmental

impacts for all proposed actions under the alternatives are not possible until Tier 2 documents are developed as projects are funded and demand allows. For further clarification see the responses to Comments R-1-4 and L-4-2.

Also see the responses to Comments F-1-1, F-1-3, F-1-5, and F-1-7 for quantification (where possible) regarding water quality and air quality potential impacts. Mitigation measures and management plans, including a storm water management plan, buffer zones around drainages in Open Space Lands, and prescribed burn management plans, are all included in the RMP/EIS.

L-4-8

The Biological Resources Section 3.4.5.1 now addresses migratory birds, their potential habitat, and uses of the Plan Area more explicitly. All spring and fall migrants are identified in Table A-2. Potential impacts to migratory birds (during breeding or nesting) would be addressed at the project level when project footprints and affected habitats can be identified. Appropriate management improvements and mitigation would be developed in project-level documents to address specific proposed activities and the anticipated impacts from each.

L-4-9

The listing for great blue heron in Table A-2 now includes “breeds in the Plan Area.” The existing great blue heron rookeries in the Plan Area are already in high-traffic areas (near Santa Ana Road), and extension of the Lake Shore Trail around the lake perimeter is not proposed in the Preferred Alternative.

The level of detail requested by the question regarding bird populations in specific areas around the lake is appropriate to project-level documents. More detailed studies on bird impacts may be conducted when projects get approved and funded. Currently, grebe and other water-dependent bird populations in the Plan Area appear to be stable, and conversations with park staff indicate that population numbers depend more on water level and food supply than on human disturbance level.

L-4-10

Exact project locations are not known for many proposed actions, i.e., amphitheater, open space trails, and relocation of storage area.

As described in the Draft RMP/EIS, the goal of this programmatic document is to identify current sensitive habitat so that when designing future actions/projects under this RMP, sensitive habitat can be avoided. At the time project locations are known, the overlays referred to can be produced.

L-4-11

This level of details is not required in a Tier 1 Programmatic document. Relative abundance data for wildlife species in the vicinity of the lake may be addressed if appropriate in subsequent project-specific environmental documents.

Predicting the response that a given wildlife population will have to a human disturbance is a complex process, as wildlife response is often site-specific and may change over time given the exact nature of the disturbance. As a result, specific mitigation measures are best developed in conjunction with specific project plans. The Mitigation Measures developed in Section 4.4.7 (BI-1 through BI-6) of this programmatic document emphasize the process that would best be

implemented to develop successful project-specific mitigation. This process emphasizes on-site population studies and long-term monitoring which would allow adaptive mitigation measures to be developed. From a vegetation perspective, oak planting and native plant restoration efforts across the state have proven effective as mitigation for human impacts, and replacement ratios with target replacement ratios for removed trees is standard practice.

L-4-12

Alternative 1 is defined as the No Action Alternative and is described in Section 2.6.1. Current resource management direction would continue unchanged. Therefore, where no management program exists currently, i.e., vegetation or restoration plans, none would be produced under the No Action Alternative. This is the whole basis for describing a no action alternative. It allows a comparison of current level of impacts and reasonably foreseeable no action impacts to the Action Alternatives. (Section 1502.14 and 1502.16 of CEQ NEPA Regulations)

In compliance with NEPA regulations, mitigations are proposed for the Action Alternatives, not for the No Action Alternative. The No Action Alternative would not add the management actions or facilities included in the Action Alternatives, and therefore mitigation measures are not required.

L-4-13

The Preferred Alternative (Alternative 2) does not allow body contact. If an amphitheater is funded and built, mitigation measures and proper siting would be required to prevent Significant Impacts. On balance, biological impacts would be less for Alternative 2 than Alternative 1 (No Action).

L-4-14

Alternative 2 is the Preferred Alternative and includes several natural resource management plans to balance enhanced recreation opportunities. Feasible mitigation measures have been identified. As stated in numerous responses, any future actions or addition of facilities would require Tier 2 environmental documents to address site-specific impacts.

L-4-15

Cumulative impacts are addressed for the resources that would contribute to regional impacts. Not all impacts contribute to regional cumulative impacts, e.g., hazardous materials, visual resources, soils and geology.

In general, cumulative impacts are not quantified because RMP/EIS project specific impacts cannot be quantified until Tier 2 documents are produced for specific Actions. For those cumulative impacts that can be addressed, refer to the responses to Comments L-4-7, R-2-2, F-1-7, and L-4-2.

L-4-16

Alternative 1 does not include various natural resource management plans, e.g., habitat and vegetation management plans. Thus, impacts from Alternative 1 may contribute to cumulative impacts.

L-4-17

See the changes to Section 4.9.7.

The public scoping report (2007) was referenced several times in the Draft RMP/EIS, e.g., Section 2.2.4 and 3.9.3. The issues raised during public scoping are summarized in Section 3.9.3.

The adverse impacts referred to in the last paragraph are focused on the quality of the recreation experience. Potential impacts related to habitat degradation are addressed in Sections 4.2, 4.4, and 4.5, and other parts of Section 4. No Action impacts are included in Section 4. These impacts include those listed under common impacts. By definition, No Action would not add any new management actions beyond the already planned recreational improvements. Therefore, there are no new impacts and no requirements for mitigation and under the No Action Alternative, new recreational opportunities would be limited. Natural resource management plans are not included in the No Action Alternative because they do not currently exist. Please note that the No Action Alternative by definition provides the benchmark to compare to the Action Alternatives.

Refer to L-4-15 for further discussion of cumulative impacts for the Action Alternatives.

L-4-18

Refer to the response to Comment L-4-15 for discussion of quantifiable cumulative impacts.

The impact discussion for each resource category is based on the information available at this Tier 1 level of a programmatic document. Section 1508.28 of CEQ NEPA Regulations states that Tier 1 documents are appropriate for a “program or plan” and that they should focus on issues that are ripe for discussion. Subsequent Tier 2 narrower statements and analysis should concentrate on issues specific to the subsequent site-specific projects.

The definition of irreversible changes is stated in Section 4.12 in accordance with CEQ NEPA Regulations. NEPA requires that environmental analysis include identification of “...any irreversible and irretrievable commitments of resources which would be involved in the proposed action should it be implemented.” Irreversible and irretrievable resource commitments are related to the use of nonrenewable resources and the effects that the use of these resources have on future generations. Irreversible effects primarily result from use or destruction of a specific resource (e.g., energy and minerals) that cannot be replaced within a reasonable time frame. Irretrievable resource commitments involve the loss in value of an affected resource that cannot be restored as a result of the action (e.g., extinction of a threatened or endangered species or the disturbance of a cultural site).

The comment seems to focus on long-term negative consequences. The focus on this section is, however, on an irreversible commitment of non-renewable resources.

L-4-19

See the response to Comment R-1-2 for discussion of charter documents and authority to allow recreational uses on the lake and within the watershed (Section 401 of Title IV). See the responses to Comments R-1-5 and R-1-6 for further discussion of operating agreements.

The purpose of this RMP/EIS is to provide a long-term management plan for the Plan Area. Future management agreements regarding specific areas or uses within the Plan Area will use this document as a framework, but are not the subject of this RMP/EIS.

L-4-20

None of the activities in the Preferred Alternative are mandated by charter or operational agreement between Reclamation and CMWD. Future managing partner(s) are not identified in

the RMP/EIS but would be identified in the long-term management agreements. The long-term agreement would describe implementation procedures for the RMP/EIS, including responsibilities and funding for construction and operation of any new facilities.

L-4-21

Body contact was evaluated under Alternative 3 and has not been included in the Preferred Alternative (Alternative 2). During public scoping and other public meetings, both positive and negative comments have been received regarding recreation on Open Space Lands.

L-4-22

See the response to Comment R-1-2. Title IV of the Reclamation Act of 1974 does not exclude recreation. As stated in Section 401, it is intended to “provide for protection of water quality and provide preservation and enhancement of public outdoor recreation.” Any recreational uses in Open Space Lands would be managed with the same care as current recreational uses adjacent to the lake.

L-4-23

See the response to Comment R-1-10 for discussion of prescribed burning and mitigation measures for fuel treatment activities.

Active habitat restoration is now included as a component in the proposed annual weed eradication program (Sections 2.7.2 and 2.7.5, and Table 2-2). Weed eradication strategies will be proposed in all project-level environmental documents and will be tailored to the unique conditions in each project area. Factors such as weed species composition and density will determine which method or combination of methods (including restoration) is most appropriate for the site. Recreation trail construction and maintenance and monitoring of prescribed burning on Open Space lands is addressed in the response to Comment R-1-27. Currently no housing tracts are in or near the Open Space lands.

L-4-24

The Preferred Alternative (Alternative 2) would provide limited day use and joint use hiker/biker trails, but not equestrian use. See the response to Comment R-1-27 for more discussion of protection of water quality and trail maintenance. The fire management plan would address fire safety.

L-4-25

Body contact will not be allowed in the Preferred Alternative (Alternative 2). Also, see the response to Comment R-1-28. For recreation use on Open Space Lands see the response to Comment L-4-22.

L-4-26

The comment is noted. As stated above, the RMP/EIS a Tier 1/programmatic document. Additional environmental documentation must be prepared before implementation of any future actions that would result in new facilities, ground disturbances, or environmental impacts beyond the programmatic analysis provided in this document.

L-5 Academy of Model Aeronautics (AMA) Chapter 173 Ventura County, Timothy Moran



"Jackie Collins" <jcollins@mp.usbr.gov>
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Subject Fwd: Comments to Draft Lake Casitas RMP/EIS

>>> Timothy Moran <tmoran@raytheon.com> 10/30/08 7:51 AM >>>

My name is TJ Moran and I'm writing to comment on the draft RMP/EIS for Lake Casitas. First let me acknowledge the Bureau of Reclamation for a well-written, and thorough document.

I have been a member of the Academy of Model Aeronautics (AMA) for over 20 years, and a 10-year member of the AMA charter 173 Ventura County Comets RC model airplane club, which was founded in 1958. I generally fly RC airplanes an average of 2 to 3 times a month on weekends. I fly models powered by glow engines, gasoline engines, and electric motors, and now have 15 or so flyable models. The Comets currently are allowed to use the RC model flying field located below campground O in the park proper. Virtually all our club members purchase annual passes to allow access to the RC model flying field. This is the 3rd flying site we have occupied in the Lake Casitas area, the first 2 sites were located in what is now the lakebed, and were submerged when the lake filled. We have occupied the current site since 1981. The paved 500 foot runway, taxiways, pit area, small shed, safety fences, sunshade, impound board, barbeque pit and any other flying field improvements were funded by, and built by the club members over the years. We are safety conscious, and are good stewards of our area, and keep it clean and neat. The current location is away from most of the main camping areas. Over the winter season, campground O (the closest campground) is closed generally from September through April. Campgrounds K and M are also closed over the winter months (though the closure period is less than that of campground O.)

Our club subscribes to the AMA noise limitation guidelines and we are committed to being "good neighbors." We have an early morning and an evening curfew to not disturb the wildlife nor the campers. We only allow a maximum of 5 airplanes in the air at any one time. Most of the RC

flying is
done from about 8 am until 11 am, as the usual wind patterns in the
late
morning, preclude operating the model aircraft. There are a group of
about
8-12 pilots who fly on Tuesdays and Thursdays, and another group of
about
6-10 pilots who fly on Saturdays and Sundays. The rest of the time,
the
field experiences only limited occasional useage. Generally when
campground
O is occupied, people are entertained by the models in flight, and
cheer
for us after we land. Noise complaints have never been an issue.

We sponsor two "float flies;" one in April and the other in October.
These
are events where we operate models with floats off the lake. The
events
have been on-going for years and many modelers (45 to 65) travel from
the
surrounding areas for day-use and also overnight camping, bringing in
revenue to the lake. We cordon off a flying area with floating safety
bouys. The events are well-attended and well-liked by the RC modeling
community. Non-modeler campers are attracted to the event for it's
entertainment value, and some do express an interest in the hobby.
There
have never been noise complaints about these events.

RMP/EIS Para 2.6.3 states "A radio-controlled model airplane strip
currently located at the north end of the lake may be moved."

I
believe this action would impose an undue hardship on our model club
and
it's members, and should not be considered. It certainly is not a "No
Action" Alternative 1 as far as we are concerned.

L-5-1

RMP/EIS Para 2.7.3 states "Under Alternative 2, the radio-controlled
model
airplane strip would be relocated." Again, I believe this
action
would impose an undue hardship on our model club and it's members, and
should not be considered. It certainly is not an "Enhancement"
Alternative
2 as far as we are concerned.

L-5-2

RMP/EIS Page 2-17, Table 2-1, North End X-1 I believe our model
airstrip setting should be classed as remote.

L-5-3

RMP/EIS Page 2-21, Table 2 -2 Relocates or removes the model
airstrip
under alternatives 2 and 3. Again, I believe this action
would
impose an undue hardship on our model club and it's members, and should
not
be considered. It certainly is not an "Enhancement" Alternative 2 as
far as
we are concerned.

L-5-4

RMP/EIS Page 3-75 Radio Controlled Airplanes. I believe the
considerations about noise are overstated for all the reasons above.

Appendix E

Responses to Comments on the Casitas RMP/EIS

L-5-4, Cont.	We have been on this current site for 27 years without noise complaints.
L-5-5	RMP/EIS Page 4-3 para 4.1.4.2 Lake Recreation: and Page 4-4 para 4.1.5.3 Infrastructure, Services/Facility Upgrades. The radio-controlled airplane strip (located north of the lake) may be moved in this option. Again, I believe this action would impose an undue hardship on our model club and it's members, and should not be considered.
L-5-6	RMP/EIS Page 4-31 Mitigation Measure B1-2. I believe this mitigation is unnecessary as our 27 years of operation at the current site have not caused any of these issues.
L-5-7	RMP/EIS Page 4-58 para 4.9.5.2 Lake Recreation: "The current location of the radio-controlled airplane strip generates a lot of noise especially on event days, which is a major adverse impact on campers in its vicinity. Concern has been raised that it also has a negative impact on water fowl in the wetlands and coves close to the airstrip. Alternative 2 proposes it be relocated with the associated costs to be paid by private interests. As discussed in the Biology Section 4.4, the noise generated by the radio-controlled airplane strip presents a potential impact to breeding raptors and grebes as well as to nearby campers. Limiting use to the nonbreeding season from September 1 through February 1 would also eliminate most conflicts with campers since most camping occurs during the summer."
L-5-8	- - - a lot of noise - - - I believe this is a gross overstatement of the issue. The majority of model flying occurs on 2 weekday mornings, and weekends from 8 am until about 11 am. Campgrounds K, M, and O are usually closed to camping by the park over the slow winter season. Our model airplanes are certainly much quieter than some of the currently allowed "high performance skiboats" with open exhaust stacks which are now allowed access to the lake. Potential noise impacts imply that it could be a future issue. This is not a future issue. We are now operating (and have been for 27 years) model airplanes at our current site, as we propose to do in the future. There has been no known impact to breeding raptors and grebes. The AMA has available studies and papers on the subject of bird disturbance, which are available if you so desire. I believe that relocating the RC model airstrip would impose an undue hardship on our model club and it's members, and should not be considered.
L-5-9	RMP/EIS Page 4-63 para 4.9.7.9 Mitigation Measure R-5

**L-5-9,
Cont.**

- - - One relocation option considered is west of its current location close to State Route (SR) 150 between Coyote Creek Cove and Station Canyon Cove. Residual impacts would be minor. - - -

This area is unsuitable for an RC model airplane strip, and should not be considered for the following reasons:

1. When the lake is at full capacity, the remaining area between the lake and SR 150 is not large enough to accommodate an adequately long runway oriented into the prevailing winds. Such an oriented runway would place the models over SR 150 at a low, unsafe altitude during approach to landing. Drivers on SR 150 could be distracted by the sight of an airplane at a low altitude. An unsafe condition.
2. Use of this site would require an access road onto SR 150. This would not be considered a safe access, and as such, would likely require turn-in lanes and acceleration/merging lanes to ensure safety.
3. The site would be remote from the park proper and would not be protected, patrolled, and controlled by the park and the park rangers. This would promote vandalism, which would be a problem.
4. I believe the cost to develop a new model flying site at this location would impose an undue financial hardship on our model club and it's members, and should not be considered.

Thank you for the opportunity to review the RMP/EIS and thank you for your consideration in this matter.

TJ Moran

TJ_Moran@Ojai.net

Responses to Comment L-5

L-5-1

See the responses to Comments L-5-2 and L-5-3.

L-5-2

“Moderately remote” is consistent with the WROS classification.

L-5-3

The text of Mitigation Measure BI-2 has been modified to indicate that no plans have been made to relocate the model airstrip. Radio-controlled airplanes will continue under their current schedule of using the airstrip two weekdays (Tuesday and Thursday) and on weekends (Saturday and Sunday) from 8:00 AM to 11:00 AM. Existing special events such as Float and Fly will also be allowed; however, activities at the model airstrip may not be expanded beyond the current schedule, as described above, during non-event weeks.

Additionally, the local model airplane club and its members will be required to submit a monitoring report to the local managing partner every 2 years. The reports will have input from

local rangers and other available sources and describe any disturbances to campers or wildlife from activities at the airstrip. Based on these 2-year reviews, changes may be made to restrictions and regulations regarding the model airstrip.

L-5-4 and L-5-5

As discussed in the response to Comment L-5-3 above, the relocation of the model airstrip has been removed from the Preferred Alternative. During the public scoping meeting held in 2003, some concern was expressed about noise disturbance to campers using areas near the airstrip. However, after investigating the alleged concern with local officials and reviewing the public scoping document which summarized the concerns about the Lake Casitas RMP, it appears that this concern is held by the minority and is not an overriding issue. See the preceding response for additional information on requirement of periodic monitoring reports.

L-5-6

See the text changes to the language of Mitigation Measure BI-2.

L-5-7 and L-5-8

See the response to Comment L-5-3 above. Qualitative observations of grebes at Lake Casitas by rangers indicate that the population has been stable or has increased over the last 5 years, suggesting that disturbance from model airplanes is not impacting the birds. Furthermore, local authorities have indicated that the food supply and water level in the lake are the main factors influencing grebe populations.

L-5-9

The comment is noted. See the response to Comment L-5-3.

E.5 COMMENTS FROM INDIVIDUALS

I-1 Christopher Anacker

LAKE CASITAS RMP and EIS

MY NAME IS Christopher Anacker
I LIVE IN Oak View NEIGHBORHOOD IN [COUNTY].

QUESTIONS/COMMENTS ON THE LAKE CASITAS RMP and EIS

I-1-1

1) Relocate trailer storage + maint yard away from front use to allow for more day use

I-1-2

2) Invest increased revenues from new day use from #1 to build or connect sewer line and eliminate sewage trucking costs

I-1-3

3) Relocation of fire station to increase safety + reduce sewage effluent

I-1-4

4) Passive use/recreation/hiking in the open space area to the north; renovation of Selby House for community usage (fee based)

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Send your comments (delivery receipt and signature requested) to:

Mr. Bob Epperson, Project Manager
Bureau of Reclamation
1243 'N' Street, Fresno, CA 93721

OR - Email your comments (delivery receipt option selected) to:

repperson@mp.usbr.gov

Responses to Comment I-1

I-1-1

Relocation of the storage area is included in the Preferred Alternative (Alternative 2).

I-1-2

Comment noted.

Subsequent to certification of the RMP, a long-term management agreement would deal with implementation and funding.

I-1-3

See the response to Comment R-1-13.

I-1-4

See the Preferred Alternative (Alternative 2).

I-2 Connie Biggers (1 of 2)

LAKE CASITAS RMP and EIS

MY NAME IS Connie Biggers

I LIVE IN Mira Monte NEIGHBORHOOD IN [COUNTY].

QUESTIONS/COMMENTS ON THE LAKE CASITAS RMP and EIS

I-2-1	1. Is the Teague Watershed going to be preserved - land taken previously will never be developed?
I-2-2	2. Keeping the integrity of the drinking water -- how is this going to be compromised?
I-2-3	3. Water skiing - promotes safety risks - hospital / inadequate
I-2-4	4. Traffic has got to be addressed?
I-2-5	5. Lake is bigger better with a diminishing lake?
I-2-6	6. More individuals cramped into smaller area is going to mean more trouble -- security problems are going to increase
I-2-7	7. Pollution will be - oil / dunes in lake / noise / traffic / air (contact there and)
I-2-8	8. Who is actually going to benefit from this change?

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Responses to Comment I-2

I-2-1

The Preferred Alternative (Alternative 2) includes limited day use in Open Space Lands.

I-2-2

Please refer to the water quality section of the Final EIS. Body contact will not be allowed.

I-2-3

Body contact will not be allowed in the Preferred Alternative (Alternative 2).

I-2-4

See the responses to Comments R-2-1 and R-2-2.

I-2-5

The Preferred Alternative in the Final RMP/EIS is Alternative 2.

I-2-6

The Preferred Alternative does not decrease the size of the Plan Area or area available for recreation.

Included with the proposed management actions are management plans to address issues like security that may result from the implementation of some of the actions under the alternatives.

I-2-7

No body contact is allowed in the Preferred Alternative. Also see responses to Comments R-2-1 and R-1-40.

I-2-8

The Preferred Alternative seeks to balance recreation use with resource protection.

I-3 *Connie Biggers (2 of 2)*

2008 SEP 19 10:12

MY NAME IS Connie Biggers E-Mail cgobigred@att.net

I LIVE IN Ojai, Ventura NEIGHBORHOOD IN [COUNTY].

QUESTIONS/COMMENTS ON THE LAKE CASITAS RMP and EIS

I-3-1 1. First and foremost, drinking water is its primary use.

I-3-2 2. Who will really benefit from the proposed major changes?

I-3-3 3. The quality of the water, air, traffic, noise and safety in
the proposed area will greatly effect valley residents/visitors.

I-3-4 4. If people need water sports, why not use the Pacific Ocean?

I-3-5 5. If people need hiking trails, why not use what is available
within a 15-mile radius?

I-3-6 6. If people need a place to camp, carve up something besides
the area around the lake.

I-3-7 7. Family ranchers were forced to give up their homes because
of eminent domain, it now appears the rules have changed--perhaps
to the highest bidder.

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Mr. Bob Epperson, Project Manager
Bureau of Reclamation
1243 'N' Street, Fresno, CA 93721

OR - Email your comments (delivery receipt option selected) to:

repperson@mp.usbr.gov
cc Senator: Barbara Boxer
cc Senator: Diane Feinstein
cc Representative Elton Gallegly

Responses to Comment I-3

I-3-1 through I-3-7

See the responses to Comments I-2-1 through I-2-8.

I-4 Richard Handley

LAKE CASITAS RMP and EIS

MY NAME IS Richard Handley

I LIVE IN Ojai City NEIGHBORHOOD IN [COUNTY].

QUESTIONS/COMMENTS ON THE LAKE CASITAS RMP and EIS

I-4-1 The Teague Watershed is vital to the water quality of Lake Casitas. It must remain closed to public use of any kind.

I-4-2 The main island in the lake is an important refuge for wildlife and a rookery for blue herons. It needs to remain off limits to public use.

I-4-3 I support Alternative 1 and don't want to see increased development at the lake.

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repperson@mp.usbr.gov

Storm water management would be a good idea.

Responses to Comment I-4

I-4-1

See the responses to Comments R-1-2.

I-4-2

See the response to Comment L-4-9.

I-4-3

Comment noted. Alternative 2 is the Preferred Alternative.

I-5 Leanna Kennedy



"Robert Epperson"
<repperson@mp.usbr.gov>
11/03/2008 09:49 AM

To: <Nick_Zubel@URSCorp.com>, "Steve Kellogg"
<Steve_Kellogg@urscorp.com>
cc
bcc
Subject: Fwd: lake casitas rmp and eis

>>> <leannakennedy@roadrunner.com> 10/29/08 11:24 AM >>>
I know this response is really late, but here goes anyway.

My name is Leanna Kennedy and I live in Oak View, California. I have lived here all my life and Lake Casitas has been a big part of it. My father was a school bus driver for the old Santa Ana School, which is now under the lake. I have camped and fished at the lake many, many times.

I understand that the Bureau of Reclamation was seeking public input regarding the usage of Lake Casitas and the surrounding watershed.

I-5-1

Personally would like to see the camping areas expanded, more full hook-up sites and more convenient reservations. I would like to see a swimming pool open on weekends (at least May 1st through October 1st) and more community based programs, free entrance to area residents once a year or something on that order. For what we pay for water in Oak View, I feel that locals should get some kind of discount for using Lake Casitas, say a 25% discount on a season pass. I would also think for safety the entrance gate should be manned at all times.

I-5-2

I would also like to see the watershed areas put to use in some way that the public could at least walk on them. Perhaps guided wildlife tours, group picnicking by reservation or horseback riding in the back areas.

I-5-3

I do not want to see the lake opened for water skiing, personal watercraft, or horseback riding near the lake. (This is our drinking water.)

I-5-4

I have strong feelings for Lake Casitas and would like to see it upgraded, but still maintain the natural environment as much as possible.

--
Leanna Kennedy
650 Old Grade Road
Oak View, CA 93022
805-649-9720
leannakennedy@roadrunner.com

Responses to Comment I-5

I-5-1

The comment is noted. See Section 2.7 for a description of the management actions included under the Preferred Alternative.

I-5-2 through I-5-4

The comments are noted.

I-6 Benjamin and Judith Lary

MY NAME IS Benjamin & Judith Lary
I LIVE IN Oak View NEIGHBORHOOD IN [COUNTY]. Ventura Co.

QUESTIONS/COMMENTS ON THE LAKE CASITAS RMP and EIS

I-6-1

The lake ^(Casitas) should be a water source and not open to public recreation. One of the most important issues in S. Calif. is to maintain a clean and adequate water supply. We cannot take the chance of contaminating our water with mussels, human waste & germs, etc. We are ok with the current fishermen as long as their boats are thoroughly inspected. Lake Casitas is our water supply!

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Responses to Comment I-6

I-6-1

Body contact will not be allowed under the Preferred Alternative. Also, see the response to comment R-1-24 for a discussion of quagga mussel protection procedures.

I-7 Bill Miley

LAKE CASITAS RMP and EIS

MY NAME IS BILL MILEY

I LIVE IN OTAI city NEIGHBORHOOD IN [COUNTY].

QUESTIONS/COMMENTS ON THE LAKE CASITAS RMP and EIS

The prime concern should continue to be water quality protection and passive recreation on shore and water —

I-7-1

horses damage ground and create loose soil — bikes in Tlaque w. can raise risk of fire, trail damages, debris, water skiing raises noise issues one ski boat will "pollute" the sound environment for hundreds. more RV sites for expensive RVs cuts out the campers and those needing reasonable priced and available recreation.

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repperson@mp.usbr.gov

Responses to Comment I-7

I-7-1

Comment noted. See management actions in the Preferred Alternative (2).

I-8 Shirley Palmer

LAKE CASITAS RMP and EIS

RECEIVED
BUREAU OF RECLAMATION
SCAG
FRESNO CA

MY NAME IS Shirley Palmer

2008 SEP 10 P 1:09

I LIVE IN Oak View NEIGHBORHOOD IN [COUNTY].

QUESTIONS/COMMENTS ON THE LAKE CASITAS RMP and EIS

I-8-1

This lake holds our drinking water and I object strongly to opening it up to swimming, skiing and such. People don't vaccinate their kids against a lot of the diseases that can be passed through the water because they think it is dangerous. Well, I don't want to drink the water that they are swimming and urinating in. Please do not open the lake to these things. Thank you.

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Bureau of Reclamation
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OR - Email your comments (delivery receipt option selected) to:

repperson@mp.usbr.gov

Responses to Comment I-8

I-8-1

The Preferred Alternative does not include body contact.

I-9 Deborah Lee Clark

----- Message from Deborah Lee Clark <deborahleec@hotmail.com> on Thu, 18 Sep 2008 09:31:40 -0700 (PDT) -----

To: repperson@mp.usbr.gov
Subject: Lake Casitas plan

I-9-1

I have serious concerns about the water quality if bodily contact is permitted. Having listened to a naturalist at Lake Cachuma in Santa Barbara County I understand that removing the possible disease/polluting affect of human contact in order to make water potable is a major if not impossible undertaking. With that information **I oppose Alternative 3** of the Resource Management Plan for Lake Casitas, Ventura County, California.

Thank you,
Deborah Clark

Responses to Comment I-9

I-9-1

The Preferred Alternative in the Final EIS is Alternative 2 and does not include body contact.

I-10 Jayne Pendergast

LAKE CASITAS RMP and EIS

MY NAME IS Jayne Pendergast

I LIVE IN Casitas Springs NEIGHBORHOOD IN [COUNTY].

QUESTIONS/COMMENTS ON THE LAKE CASITAS RMP and EIS

I-10-1

I'm for no-action
We are drinking this water and
we don't need all that recreation
and bodies in the water - polluting it.
All the extra vehicles will bring
more smog into the valley that we
can't get rid of once it gets caught
in by the mountains. I have lived
here over 60 yrs and I think fishing
is enough in the lake.
Thanks for listening

ADDITIONAL COMMENTS MUST BE RECEIVED by the Bureau of Reclamation no later than close of business Thursday, September 25, 2008.

Send your comments (delivery receipt and signature requested) to:

Mr. Bob Epperson, Project Manager
Bureau of Reclamation
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OR - Email your comments (delivery receipt option selected) to:

repperson@mp.usbr.gov

Responses to Comment I-10

I-10-1

The comment is noted. Also see the response to Comment I-9-1.

I-11 Ernest Rischar

LAKE CASITAS RMP and EIS

MY NAME IS ERNEST RISCHAR

I LIVE IN Oak View NEIGHBORHOOD IN [COUNTY].

QUESTIONS/COMMENTS ON THE LAKE CASITAS RMP and EIS

I-11-1

I WOULD LIKE TO SEE MORE
HIKING TRAILS ON BOTH THE
CASITAS MANAGEMENT AREA
AND THE ^{TRAGUE} ~~TRAGUE~~ WATERSHED
AREA.

ADDITIONAL COMMENTS MUST BE RECEIVED by the Bureau of Reclamation no later than close of business Thursday, September 25, 2008.

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repperson@mp.usbr.gov

Responses to Comment I-11

I-11-1

Comment noted. Refer to the Preferred Alternative (2).

I-12 Jennifer Ware



"Robert Epperson "
<repperson@mp.usbr.gov>
11/03/2008 09:47 AM

To <Nick_Zubel@URSCorp.com>, "Steve Kellogg"
<Steve_Kellogg@urscorp.com>
cc
bcc
Subject Fwd: Lake Casitas RMP and EIS

>>> Jennifer Ware <jwid2@msn.com> 10/23/08 10:27 AM >>>
Mr. Epperson,

My name is Jennifer Ware. I live on the west end of Ojai near Lake
Casitas.

I-12-1

I oppose the plan for expanding the availability of the Lake Casitas
recreation area as I believe that Ojai will be adversely affected by the
increase in traffic and pollution.

I-12-2

The remaining areas now owned by the BLR should be preserved for the
natural wildlife and the public should not be allowed access due to the
increased danger of fires, vandalism etc.

Respectfully,
Jennifer Ware

Responses to Comment I-12

I-12-1

See the responses to Comments R-2-1 and R-2-2 in regard to traffic concerns.

I-12-2

The response to Comment R-1-13 discusses use of Open Space Lands.

E.6 COMMENTS FROM AUGUST 28, 2008, PUBLIC HEARING

PH (Public Hearing) Comment 1

The first scoping meeting was held in 1999, and the second one was held in 2003, which was five years ago. I am concerned about the time lag, because changes have occurred in the past five years that may not be reflected in the RMP/EIS.

Response to PH Comment 1

As described in Section 2.2.4, public scoping meetings were held in 1999, 2003, and 2006. The June 2006 meeting focused on the three conceptual alternatives presented. The RMP/EIS reflects the issues that were presented at all public meetings, along with the study area conditions that existed at the time the Draft RMP/EIS was circulated for public review (July 2008). The Final RMP/EIS has been further updated with current data including air quality status, and biological species occurrences, as well as current concerns such as climate change and greenhouse gas emissions.

PH Comment 2

Why didn't you consider greenhouse gases in the RMP/EIS? There are a lot of projects proposed in the RMP/EIS, and there is no mention of the cumulative impacts.

Response to PH Comment 2

The Final RMP/EIS has been updated to include information about climate change, greenhouse gases, and related cumulative impacts, as described in the response to Comment F-1-7.

PH Comment 3

When will the traffic impacts be analyzed for these alternatives? We have very special traffic issues with Lake Casitas. It's a level of service for SR 33. Also, we have a growth management plan in the City of Ojai that limits the number of units that are built. This has been developed over 30 years (the time that I have lived here), and any proposal to increase visitation has to fall into the components that are already in place for the valley.

Response to PH Comment 3

Mitigation for traffic impacts from RMP actions and the relationship with local planning are discussed in Final RMP/EIS Section 4.10.7 and the responses to Comments R-2-1 and R-2-2.

PH Comment 4

The notice for this meeting indicated that this meeting would be conducted in cooperation with the Casitas board. I also understand that the Casitas Board has its own plan for developing the Casitas recreation Area. Were or are those elements being built into this RMP/EIS? Or will they be individually identified? Also, has the Casitas Board updated their plan for water operations?

Response to PH Comment 4

The statement in the meeting notice that the meeting would be conducted in cooperation with the Casitas Municipal Water District (CMWD) was incorrect. Although Reclamation has consulted with CMWD on the development of the RMP, the RMP/EIS is a federal plan that has been developed by Reclamation to address resource management alternatives for the Park and

adjacent Open Space Lands as appropriate for water quality, recreation, and natural resource management opportunities. The RMP does not affect or propose changes to the operation of Lake Casitas and its water delivery facilities for water supply.

PH Comment 5

I am concerned that developing “resort-type campgrounds” and attracting additional RVs will be too much for the Santa Ana Road to handle. Also concerned that attracting large boats to the Lake are too big for the lake to handle.

Response to PH Comment 5

The commenter’s concerns are noted. Although some tent campsites would be converted to accommodate multiple uses (tents, RVs, and yurts), the resort-type development proposed for Alternative 3 will not be implemented as part of the Preferred Alternative. The existing minimum and maximum boat sizes (6 feet with special use permit and 35 feet, respectively) will remain the same under the Preferred Alternative.

PH Comment 6

I share comments about improving the facilities at Lake Casitas and the impacts on traffic. Making the lake more attractive to LA area people simply means more traffic, more air pollution, and less facilities available to the valley residents whose taxes have supported the lake, and whose people were bumped out of the lake itself to make room for the lake. I also think we’re better off with the Casitas Board and the citizens of this community administering this lake because they live here and they know what’s going on. I don’t want the watershed opened up to all kinds of traffic when we have enough problems with runoff from the watershed. Anytime you open it up to the public, you’re going to increase those problems and there is nothing you can do to mitigate them.

Response to PH Comment 6

As stated in the response to PH Comment 5, the resort-type development proposed for Alternative 3 will not be implemented as part of the Preferred Alternative. The Preferred Alternative would not substantially expand recreation in the Plan Area, and it includes several natural resource management plans to balance enhanced recreation opportunities. Moreover, proposed actions would be subject to available funding as well as public demand. Projects implemented under the Preferred Alternative would require separate and focused environmental impact analyses that will include public input.

Mitigation for traffic impacts from RMP actions is discussed in Final RMP/EIS Section 4.10.7 and the responses to Comments R-2-1 and R-2-2.

PH Comment 7

I also don’t want to see anyone jet ski in this lake because it provides our drinking water.

Response to PH Comment 7

No personal watercraft would be allowed under the Preferred Alternative.

PH Comment 8

When Lake Casitas was built in the 1950s, it was found that the watershed right around the lake was zoned for 10,000 single-family homes. Because of the work of a number of individuals,

there was an Act of Congress that created the Teague Memorial Watershed so that there wouldn't be 10,000 single-family homes built around the lake. And there were a couple dozen homes that were in the watershed that have been demolished gradually over time in the last forty years to keep the watershed pristine, and to keep the water quality in the lake pristine. And so, other people in this group would be nervous about hooking up that watershed that has been kept clean in the last 40 years to recreational activities that could lead to a deterioration of water quality.

Response to PH Comment 8

The Preferred Alternative would allow limited, low-impact day use in the Open Space Lands as described in Final RMP/EIS Section 2.7.2. Any recreational uses in Open Space Lands would be managed with the same care as current recreational uses adjacent to the lake.

PH Comment 9

I would like to make sure that your documents address any species issues as well as making species in the Casitas watershed and along Rincon Creek a top priority.

Response to PH Comment 9

The comment is noted. The Final RMP/EIS addresses existing biological conditions and potential RMP-related actions and impacts in Sections 3.4 and 4.4, respectively.

PH Comment 10

Does the managerial role mentioned in the RMP/EIS mean that you are the landlord of the concessions that are at Lake Casitas? I am concerned that regulations regarding the quagga mussel will be relaxed with some of the changes that are being proposed. These regulations are very effective at preventing the spread of the quagga mussel, which is a very serious problem that's taking place in the Western states.

Response to PH Comment 10

The local managing partner, under a management agreement executed under the RMP, would be responsible for concession agreements. The RMP will provide the overall resource and recreation management direction and framework for the Plan Area. Final RMP/EIS Section 2.4.2 describes the roles of Reclamation and the local managing partner in implementing the management direction laid out in the RMP.

CMWD has instituted rigorous procedures that meet all California Fish and Game Code Section 2302 requirements to detect and prevent quagga mussels and other introduced invertebrates from entering Lake Casitas. The RMP does not propose any changes to the inspection procedures.

PH Comment 11

Will there be any change in who manages the facility? Is there not a contract now between the Casitas Municipal Water District and the Bureau of Reclamation to manage the lake using all of the criteria that are in the contract, and does this contract exist for some extended period of time in the future?

Response to PH Comment 11

CMWD currently manages the Plan Area pursuant to the 1956 agreement for the Ventura River Project, as described in Final RMP/EIS Section 1.1. The 1956 agreement did not account for the

conditions that exist today in the Plan Area or provide management direction in more than a general way. Reclamation, as the owner of the land, is obligated to provide updated resource management plans for its facilities every 10 years to account for changing conditions and legal/regulatory requirements. As part of that process, Reclamation will negotiate a new agreement with the managing partner(s) for the Plan Area. The managing partner(s) may consist of one or more entities. The managing partner(s) will have overall responsibility for managing public access, recreation, infrastructure and public services, and natural resources in the Plan Area. The RMP will provide the overall resource and recreation management direction and framework for the Plan Area. Hence, it will be a guidance document for the managing partner(s) for the Plan Area's operations and planning. Also see the responses to Comments R-1-5 and R-1-6.



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