

4.14.1.1 INTRODUCTION

This section describes the water supply and services for the Westside Community Planning Project area. This section is based on information obtained from various water related reports for the City of San Buenaventura (Ventura) for the planning area. The Ventura River, Casitas Municipal Water District, and groundwater wells are sources of water for the City of Ventura.

4.14.1.2 ENVIRONMENTAL SETTING

a. Potable Water

City of Ventura

The City's water system provides reliable and clean drinking water and fire protection to over 113,000 residents and 32,000 service connections through an infrastructure of three treatment plants, 23 booster pump stations, 31 treated water reservoirs, 11 Ventura River and groundwater wells, over 380 miles of pipelines, and a connection to the Casitas Municipal Water District (CMWD). The California Department of Public Health (Public Health) and the United States Environmental Protection Agency (US EPA) oversee the regulatory requirements that have any impact on the water system.¹ The City's 2010 water supply was comprised of five water sources: The CMWD; the Ventura River Foster Park Area (Foster Park) through surface water intake and upper Ventura River Groundwater Basin/Subsurface Intake and Wells; and three groundwater basins. In addition to the current water supply sources, the City has a contracted Table A,² an amount of 10,000 acre-feet per year (afy) of State Water Project (SWP) water with the California Department of Water Resources (DWR). To date, the City has not received delivery of its annual SWP allocations, and it is not certain if, or when, facilities would ever be constructed to transport SWP water to the City.³ The amount of water supplied to meet City demand in 2010 was 17,351 acre-feet (af), and was supplied by Calleguas Municipal Water District (CMWD), the Ventura River, and groundwater sources.

¹ City of Ventura, *2011-2017 Capital Improvement Plan*, January 24, 2011.

² The SWP has contracts to deliver 4.17 million afy to 29 contracting agencies. Table A is the original SWP water right amount.

³ City of Ventura, *2010 Urban Water Management Plan (UWMP)*, Section 3.3

Western Ventura Supply

The western portion of the City obtains water predominantly from the CMWD via Lake Casitas and the Ventura River diversion near Foster Park north of the City. Historically, the water supply from Casitas has ranged from 4,960 to 8,000 afy with the amount of water historically supplied from the Ventura River ranging from 4,200 to 6,700 afy.⁴ Because of an agreement between the CMWD and the US Bureau of Reclamation and the method of financing the Lake Casitas project, water from Lake Casitas cannot be used outside CMWD boundaries. The planning area is located within the CMWD service area and would receive water provided by CMWD.

Water Pressure Zones, Storage and Distribution

The planning area is located within water pressure zones 210 and 400. Water pressure zone 210 encompasses the planning area from south of Shoshone Street and extends south along the coast, including Downtown Ventura. Water pressure zone 400 roughly starts from Shoshone Street and extends north to the northern City's northern boundary of the Sphere of Influence.

Three reservoirs provide approximately 19.87 million gallons (mg) of operational storage in water pressure zone 210. Water pressure zone 210 has adequate storage and pumping capacity. Water is boosted from this zone directly into water pressure zones 260, 330, 400, 430, and 605K. There is one pump station within this zone with a nominal pumping capacity of 8,300 gallons per minute (gpm).⁵ The Valley Vista and Seneca Tanks provide storage for water pressure zone 400. The Seneca Tank is located within the planning area. The operational storage capacity for this zone is 2.02 mg. The zone is fed by the Valley Vista booster pump station, which has a nominal pumping capacity of 960 gpm. Water pressure zone 400 has inadequate storage (deficient 1.80 mg) and inadequate pumping capacity.

The distribution system for the planning area primarily consists of distribution mains ranging from 4 inches to 8 inches in diameter with a 30-inch main located along Ventura Avenue. The residual pressures maintained throughout the distribution system range between 40 pounds per square inch (psi) to 120 psi. Water pressure zone 210 has an area of low pressure and subsequent low fire flow availability at the zone boundary between the 210 and 400 pressure zones near Ventura Avenue.⁶

⁴ City of Ventura, *Water Master Plan*, 2011, Table ES-2.

⁵ City of Ventura, *Water Master Plan*, 2011, Table VI-4.

⁶ City of Ventura, *Water Master Plan*, 2011, Page iv, ES.

b. Recycled Water

City

The City utilizes recycled water supply from the Ventura Water Reclamation Facility (VWRF) to augment its municipal water supply. The tertiary-level treatment plant produces effluent that meets the requirements of Title 22 of the California Administrative Code at an average daily flow of 9.5 million gallons per day. Recycled water is currently used at two golf courses, for landscaping at the Olivias Adobe, the City's Marina Park, and for landscaped areas in the Ventura marina area and Auto Center Area. Treated effluent is also used for beneficial use in the Santa Clara River estuary. The City recycled water system consists of 5 miles of pipelines and two pumping facilities. There are no City recycled water facilities within the planning area.⁷

Ojai Valley Sanitation District

In 2007 the City in partnership with the Ojai Valley Sanitation District (OVSD) completed a preliminary feasibility analysis for the re-use of effluent currently discharged from OVSD to the Ventura River. Ultimately, from an economic perspective, the cost and difficulty of providing the infrastructure necessary to supply recycled water to potential users has to be balanced against the demand for such water, and the willingness of potential users to pay for it. The City and OVSD continue to discuss and work together to investigate the potential re-use of OVSD effluent. This recycled water would be used with the project area.

c. Regulatory Framework

Federal

Safe Drinking Water Act

The Safe Drinking Water Act (SDWA) was originally passed by Congress in 1974 to protect public health by regulating the nation's public drinking water supply.⁸ The law was amended in 1986 and 1996 and requires a variety of actions to protect drinking water and its sources. SDWA authorizes the US EPA to set national health-based standards for drinking water to protect against both naturally occurring and man-made contaminants that may be found in drinking water. The US EPA, state agencies, and water purveyors work together to ensure that SDWA standards are met.

⁷ City of Ventura, *Final Recycled Water Market Study, Phase 1 Report*, March 2010.

⁸ US Code, Title 42, Section 300f.

Clean Water Act

The federal Clean Water Act (CWA) Section 401 regulates the discharges of pollutants into “waters of the US” from any point or non-point source.⁹ Individual permits are issued for certain defined sources of discharge, while non-point source runoff from construction sites and urban development is regulated under a series of general permits. Construction that disturbs 1 acre or more is regulated under the National Pollutant Discharge Elimination System (NPDES) stormwater program. In the State of California, the program is administered by the local Regional Water Quality Control Board (RWQCB).

State

Urban Water Management Planning Act

The Urban Water Management Planning Act requires urban water suppliers that provide water for municipal purposes to more than 3,000 customers, or more than 3,000 afy of water, to prepare an urban water management plan (UWMP).¹⁰ The intent of the UWMP is to assist water supply agencies in water resource planning given their existing and anticipated future demands. The UWMP must include a water supply and demand assessment comparing total water supply available to the water supplier with the total projected water use over a 20-year period. It is also mandatory that the management plans be updated every five years.

Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act of 1969 established the principal state program for water quality control.¹¹ The act also authorized the State Water Resources Control Board (SWRCB) to implement the provisions of the federal Clean Water Act. The act divided the state into nine RWQCB areas. Each RWQCB implements and enforces provisions of the Porter-Cologne Act and the CWA subject to policy guidance and review by the SWRCB.

⁹ US Code, Title 33, Section 404.

¹⁰ California Water Code Sections 10610–10656, Urban Water Management Planning Act.

¹¹ California Water Code, (1969, as amended), Porter-Cologne Water Quality Control Act.

Senate Bill 221 and Senate Bill 610

Senate Bill 610 (SB 610)¹² and Senate Bill 221 (SB 221)¹³ amended state law to improve the link between information on water supply availability and certain land use decisions made by cities and counties. SB 610 and SB 221 are companion measures that seek to promote more collaborative planning between local water suppliers, cities, and counties. Both statutes require that detailed information regarding water availability be provided to city and county decision makers prior to approval of specific large development projects. Both statutes also require that this detailed information be included in the administrative record that serves as the evidentiary basis for an approval action by the city or county on such projects. Both measures recognize local control and decision making regarding the availability of water for projects and the approval of projects.

SB 221 establishes the relationship between the water-supply assessment (WSA) prepared for a project and the project approval under the Subdivision Map Act. Pursuant to California Government Code, the public water system must provide a written verification of sufficient water supply prior to the approval of a new subdivision.¹⁴ SB 221 prohibits a local planning agency from approving a tentative map, parcel map, or development agreement for residential subdivisions of more than 500 units unless the water supplier issues a written verification that a sufficient water supply is available for the project, or the local agency finds that alternate water supplies are, or will be, available prior to the completion of the project.

SB 610 modifies the requirements for the water supply assessments already required to be provided by the water suppliers to local planning agencies for certain types of projects. This bill also expands the requirements for certain types of information in an UWMP, including an identification of any existing water supply entitlement, water rights, or water service contracts held relevant to the water supply assessment for a proposed project, and a description of water deliveries received in prior years.

California State Water Code requires a lead agency to identify the public water system supplying water for a development project that is subject to CEQA and to request a WSA.¹⁵ Generally, a WSA is required if the water system has more than 5,000 connections and the project falls within one of the following categories:

- Residential development with more than 500 units or one that uses as much water as a 500-unit residential project

¹² California Public Resources Code, Section 21151.9.

¹³ California Business and Professions Code, Section 11010; California Government Code, Sec. 66473.4.

¹⁴ California Government Code, Section 66473.7.

¹⁵ California Water Code, Section 10910–10915.

- Commercial center or business with more than 500,000 square feet of space or 1,000 employees
- Commercial office building with more than 250,000 square feet of space or 1,000 employees
- Hotel or motel with more than 500 rooms
- Industrial, manufacturing, or processing plant with more than 1,000 employees, 40 acres of land, or 650,000 square feet of floor space
- Mixed-use project meeting any of the above criteria

The WSA from the public water system must indicate whether water demand associated with the project was included in the last UWMP and assess whether its total projected supplies available during normal, single dry, and multiple dry water years will meet projected demand in the service area with the proposed project. If it does not, the WSA must describe the means to be used to obtain the necessary supplies along with the identification of any needed improvements.

California Code of Regulations

The California Code of Regulations (CCR), Title 20 (Public Utilities and Energy, Sections 1605.1(h) and (i) and 1605.3(h)) establishes water efficiency standards (i.e., maximum flow rates) for specific appliances including all new showerheads (2.5 gallons per minute at 80 pounds per square inch), lavatory and kitchen sink faucets (2.2 gallons per minute at 60 pounds per square inch), and commercial pre-rinse spray valves (1.2 gallons per minute at 60 pounds per square inch). Title 20 also establishes maximum water consumption standards for urinals and water closets (1.6 gallons per flush per unit for most units). Title 24 (California Building Standards, Sections 2-5307 and 2-5352) prohibits the sale of fixtures that do not comply with the current regulations; prohibits the installation of fixtures unless the manufacturer has certified compliance with the flow rate standards; and addresses pipe insulation requirements that can reduce water used before hot water reaches fixtures.

Recent Legislation

Legislation adopted in 2010 includes a comprehensive package of bills aimed at ensuring a reliable water supply in the future, as well as restoring the Sacramento–San Joaquin River Delta and other ecologically sensitive areas. This comprehensive legislation places water supply and the delta environment on an equal footing, establishing those principles as the State of California's fundamental and co-equal goals for the delta.

Summary of the Four Bills

SB 1 - Delta Governance/Delta Plan: SB 1 establishes the framework to achieve the co-equal goals of providing a more reliable water supply to California and restoring and enhancing the Sacramento–San Joaquin River Delta ecosystem. These goals will be achieved in a manner that protects the unique cultural, recreational, natural resources, and agricultural values of the delta.

SB 6 - Groundwater Monitoring: SB 6 requires that local agencies monitor the elevation of their groundwater basins to help better manage the resource during both normal water years and drought conditions.

SB 7 - Statewide Water Conservation: SB 7 creates a framework for future planning and actions by urban and agricultural water suppliers to reduce California's water use. This bill requires the development of agricultural water management plans and requires urban water agencies to reduce statewide per capita water consumption 20 percent by 2020.

SB 8 - Water Diversion and Use/Funding: SB 8 improves accounting of the location and amounts of water being diverted by recasting and revising exemptions from the water diversion reporting requirements under current law. Additionally, this bill appropriates existing bond funds for various activities to benefit the delta ecosystem and secure the reliability of the state's water supply, and to increase staffing at the SWRCB to manage the duties of this statute.

City

General Plan

The following General Plan Policies and Actions are applicable to the Westside Community Planning Project:

Policy 5A: Follow an approach that contributes to resource conservation.

Action 5.1: Require low flow fixtures, leak repair, and drought tolerant landscaping (native species if possible), plus emerging water conservation techniques, such as reclamation, as they become available.

Policy 5B: Improve services in ways that respect and even benefit the environment.

Action 5.7: Require project proponents to conduct evaluations of the existing water distribution system, pump station, and storage requirements in order to

determine if there are any system deficiencies or needed improvements for the proposed development.

Water Master Plan

The City's current Water Master Plan, finalized in March 2011, provides an evaluation of the City's water system at its current condition and through the City's planning stages. The Water Master Plan is a planning tool as capacity, supply, and required infrastructure requirements may change with development revisions and changing regulatory and environmental constraints. Recommendations for operational changes and capital improvements are based on the current analysis of water supply, distribution, and quality, and are incorporated into a 10-year capital improvement program.

Urban Water Management Plan

The Urban Water Management Plan (UWMP) is a management tool, providing a framework for action, but not functioning as a detailed project development or action. It is important that the UWMP be viewed as a long-term, general planning document, rather than as an exact blueprint for supply and demand management. Water management in California is not a matter of certainty, and planning projections may change in response to a number of factors. From this perspective, it is appropriate to look at the UWMP as a general planning framework, not a specific action plan. The City has adopted the 2010 UWMP.

4.14.1.3 IMPACT ANALYSIS

a. Thresholds of Significance

Based upon Appendix G of the *State CEQA Guidelines* under Section XVII, Utilities and Service Systems, the following significance thresholds are used to evaluate project impacts related to water.

WAT-1 Would the project require or result in the construction of new water treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

WAT-2 Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

b. Methodology

The City's 2010 UWMP and the City's current Water Master Plan were used to analyze the potential impacts associated with water supply, storage, and distribution with implementation of the proposed project.

c. Analysis, Mitigation Measures, and Residual Impacts

Westside Community Plan Policies

The Westside Community Plan contains the following goal, policy, and action pertaining to water infrastructure and resources for future development within the planning area in Chapter 12.5, *Our Sustainable Infrastructure*.

Goal: Minimize the impacts of new development on Westside infrastructure and the Ventura River Watershed through advancing sustainable planning and design practices.

Policy 12 X: Require new development in the Westside Community to provide necessary public infrastructure to sustain anticipated development and maintain current services.

Action 12.5.4: In new development where land use changes and/or increased density occur, project proponents shall use the City's current Water and Wastewater Master Plans to determine adequate capacity, supply, fireflow, and/or infrastructure improvements.

WAT-1 Would the project require or result in the construction of new water treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? (Class III, Not Significant)

Analysis

The City developed a Water Master Plan to analyze the City's existing water infrastructure and make recommendations for operational changes and capital improvements over the next 10 years. Water infrastructure consists of storage, supply, pumping capacity, transmission and distribution, hydraulics

and fire flow. Pressure zones are defined as areas of service that are supplied by a source (or combination of sources and storage) that provides a constant hydraulic gradient with boundaries determined by ground elevations and facility locations.¹⁶

The current City reservoir sizing criteria identifies the required regulatory storage as 175 percent of maximum day demand. The existing regulatory storage demand requirement for pressure zone 210 is 18.79 mg, or in excess of 10.56 mg. The existing regulatory storage demand requirement for pressure zone 400 is 0.94 mg, or deficient 1.80 mg.

Emergency, or fire flow storage, requirements are determined by the critical land use located within each pressure zone. Fire flow for water pressure zone 210 requires 4,500 gpm for 4 hours which would equate to 1.08 mg of required fire flow storage.¹⁷ Pressure zone 400 requires the same fire flow guidelines as pressure zone 210.

The pump station for water pressure zone 210 is adequate because the station's nominal pumping capacity is 8,300 gpm with a maximum day demand of 3,263 gpm. The pump station for water pressure zone 400 is inadequate with a nominal pumping capacity of 960 gpm with a maximum day demand of 1,086 gpm.¹⁸

The City's goal is to provide customers with a minimum water pressure of 40 psi during peak hour demand conditions. The project area contains a low-pressure area near Ventura Avenue at the zone boundary between water pressure zone 210 and 400. The City's Water Master Plan determined that it was not feasible to shift the zone boundary between the 210 and 400 water pressure zones near Ventura Avenue due to the fact that the low pressure areas would experience extremely high pressures (above 120 psi) in several locations. Therefore, there are no recommended operational improvements or facility improvements proposed within this area.¹⁹

The City's Draft 2010 UWMP considers development projected in the City's 2005 General Plan. The General Plan projections included development within the Westside Community Planning project area. Based on projections in the City's UWMP, an adequate water supply will be available to meet the City's water needs. Therefore, an adequate water supply would be available for uses within the Westside Community Planning Project area. No specific development projects are proposed or analyzed at the project level in this program EIR at this time. Project-level review will be required for individual projects

¹⁶ City of Ventura, *Water Master Plan*, 2011, VI-1.

¹⁷ City of Ventura, *Water Master Plan*, 2011, Table VII-2.

¹⁸ Ventura, Draft 2010 UWMP, Table IX-1.

¹⁹ City of Ventura, *Water Master Plan*, 2011, XI-3.

proposed within the Westside Community Planning Project Area. Implementation of the Westside Community Planning Project would be consistent with the General Plan Action 5.7 of Policy 5B, as this policy requires project proponents to conduct evaluations of the existing water distribution system to determine if there are any system deficiencies or needed improvements for proposed development.

The Westside Community Plan would require that new development proposals determine adequate capacity, supply, fireflow, and/or infrastructure improvements where land use changes and/or increased density would occur (Action 12.5.4). This action would require new development in the project area to provide necessary public infrastructure to sustain development and to maintain current development (Policy 12 X). Therefore, the proposed project would incorporate actions that are consistent with the General Plan's actions and policies.

Impacts related to the construction of new water treatment facilities or expansion of existing facilities would be less than significant with implementation of the policies and actions contained in the Westside Community Plan and applicable General Plan policies, and no mitigation measures are required. Impacts would be Class III, Not Significant.

Mitigation Measures

No mitigation is required.

Residual Impacts

Class III, Not Significant.

WAT-2 Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed? (Class III, Not Significant)

Analysis

The City's 2010 UWMP projects the City's water supply and water demand for normal, dry, and multiple dry years over a 30-year planning period. The projected normal year water supply from the CMWD ranges from 6,000 afy in 2015, 6,200 afy in 2025 to 7,000 afy in 2035. During multiple-dry years, supplies from the CMWD would decline to 4,960 afy during the third year of a drought. The projected supply from the Ventura River would be 4,200 afy during a normal water year.²⁰ The supply would decrease to

²⁰ City of Ventura, *t* 2010 UWMP, Chapter 6

2,000 af during the third year of a multiple dry year. The total supply and demand during a normal year for the City is projected to be 22,000 af and 20,163 af, respectively, in 2015 resulting in a potential surplus of 1,837 af. The City is projected to increase normal year water supply to 24,700 af and water demand to 20,514 af, in 2025. The potential normal year water surplus in 2025 would be 4,186 af. The City is projected to increase water supply to 25,500 af and water demand to 22,345 af, in 2035. The potential normal year water surplus in 2035 would be 3,155 af. There are present factors that restrict water production and could potentially further restrict availability for each water supply. These risks include physical resource availability, regulatory restrictions, water quality, and legal constraints.

Water demand generated by the proposed project was calculated based on the demand factors provided in the City's Water Master Plan. As shown in **Table 4.14.1-1, Proposed Project Water Demand**, the projected increase in water demand for the planning area would be approximately 697 afy.

**Table 4.14.1-1
Proposed Project Water Demand**

Land Use	Size	Water Rate	Average Day Demand	
			(gpd)	(afy)
Retail	100,641 sf	1.60 gpm/ac ¹	5,323	5.96
Office	163,450 sf	1.60 gpm/ac ¹	8,645	9.68
Industrial	77,000 sf	1.60 gpm/ac ¹	4,073	4.56
Residential	1,415 units	168 gpcd ²	603,809	676.35
Total Water Demand			621,850	696.56

Note::

sf = square foot; gpm = gallons per minute; ac = acre; gpcd = gallons per capita per day; gpd = gallons per day; afy = acre-feet per year

¹ City of Ventura, Water Master Plan, 2011, Table III-1.

² City of Ventura, 2010 UWMP, Table 7-7

Source: City of Ventura, Water Master Plan, 2011; City of Ventura, 2010 Urban Water Management Plan; City of Ventura, General Plan Final EIR, 2005.

As discussed above, the City is forecast to have a surplus of 1,837 af of water during a normal water year in 2015, 4,186 in 2025 and 3,155 af in 2035. The proposed project normal year water demand would account for approximately 38 percent of the 2015 surplus, approximately 17 percent of the 2025 surplus and approximately 32 percent of 2035 water surplus.

Under the third year of multiple dry year water conditions, the City is forecast to have a surplus of 290 af in 2015, a deficit of 608 af in 2025 and a deficit of 2,085 af in 2035. The growth of the planning area is forecast to reach buildout in 2025. As stated in **Section 3.0, Project Description**, the proposed project would increase projected development within the Westside Community Planning Project Area above what was projected to occur by 2025 by 150 residential dwelling units, 49,005 square feet of retail uses, and 54,450 square feet of office uses. This would result in a water demand increase of 87.3 afy over General Plan projections for 2025. The growth projections of the proposed project that exceed those anticipated for the Westside Community Planning Project area would consequently exceed the growth projections for the City through 2025. The increases in development permitted by the project would represent an increase in dwelling units of 1.77 percent, an increase in retail square feet of 3.78 percent, and an increase in office space of 4.30 percent.

The UWMP contains conservation programs and demand management measures to reduce water demand in the City's service area. Furthermore, the UWMP contains a water shortage contingency plan and emergency response plan in the event that there is a severe drought or extended water shortage. For example, if water supplies are deficient up to 10 percent of normal year supplies, then a corresponding 10 percent reduction in water demand would occur.

The UWMP is a planning document that projects water supply and demand for the City using the General Plan land use projections. Therefore, the UWMP already accounts for a majority of the water demand for the Westside Community Planning Project area. No specific development projects are proposed or analyzed at the project level in this program EIR at this time. Project-level review will be required for individual projects proposed within the Westside Community Planning Project area and Citywide. The General Plan contains Action 5.1 which requires low flow fixtures, leak repair, and drought tolerant landscaping plus emerging water conservation techniques, such as reclamation, as they become available to reduce water demand. The General Plan contains Action 5.7 which requires proposed project proponents to conduct evaluations of the existing water distribution system, pump station, and storage requirements in order to determine if there are any system deficiencies or needed improvements for the proposed development. The proposed Westside Community Plan Goal in Section 12.5, *Our Sustainable Infrastructure*, identifies the need for the conservation of resources and the sustainable planning and design practices for new development. Policy 12 X, Action 12.5.4 requires new development to use the City's current Water Master Plan to determine adequate capacity, supply, fireflow, and/or infrastructure improvements.

Impacts related to the availability of sufficient water supplies to serve the project from existing entitlements and resources would be less than significant with implementation of the policies and actions contained in the Westside Community Plan and applicable General Plan policies and actions, and no mitigation measures are required. Impacts would be Class III, Not Significant.

Mitigation Measures

No mitigation is required.

Residual Impacts

Class III, Not Significant.

d. Cumulative Impacts

The UWMP is based on population and growth estimates presented in the City's General Plan, and are therefore consistent with local planning. Additionally, the target demand projections are consistent with the City's 2011 Water Master Plan demand projections, which used a land-used based approach to estimate demands.

The UWMP projects that water supplies in 2035 to be 25,500 afy with projected water demand to be 22,345 afy, but does not make assumptions as to where development will occur, other than within the 2025 planning time horizon accounted for in the 2005 General Plan.²¹

As stated in **Section 3.0, Project Description**, the proposed project would increase projected development within the Westside Community Planning Project Area above what was projected to occur by 2025 by 150 residential dwelling units, 49,005 square feet of retail uses, and 54,450 square feet of office uses. This would result in a water demand increase of 87.3 afy over General Plan projections for 2025. The growth projections of the proposed project that exceed those anticipated for the Westside Community Planning Project area would consequently exceed the growth projections for the City through 2025. The increases in development permitted by the project would represent an increase in dwelling units of 1.77 percent, an increase in retail square feet of 3.78 percent, and an increase in office space of 4.30 percent. This increase is not considered substantial, and the impact would be less than significant.

²¹ City of Ventura, 2010 UWMP, Section 2.6.

Specific projects proposed within the Westside Community Planning Project Area would be required to undergo project-level review. Furthermore, each individual development proposals within the Westside Community Planning area and the City would be required to comply with applicable goals, policies, and actions contained in the Westside Community Plan and General Plan to assure that potential impacts are mitigated to the extent feasible. Also, the UWMP will be updated and the water supply and demand evaluated every five years. With implementation of the Westside Community Plan goal, policy, action, and applicable General Plan policies and actions, cumulative impacts would be Class III, Not Significant. Therefore, the Westside Community Planning Project's contribution to cumulative impacts would not be cumulatively considerable, and cumulative impacts would be Class III, Not Significant.