



Lahontan Regional Water Quality Control Board

February 11, 2020

File: Environmental Doc Review
San Bernardino County

Paula Pereira, PLS
Project Manager
Town of Apple Valley – Engineering Department
14955 Dale Evans Parkway
Apple Valley, CA 92307
ppereira@applevalley.org

Governor's Office of Planning & Research

FEB 11 2020

STATE CLEARINGHOUSE

Comments on the Notice of Availability for the Addendum to the Initial Study / Mitigated Negative Declaration, Bear Valley Road Bridge over the Mojave River Rehabilitation Project, State Clearing House Number 2016111018

Lahontan Regional Water Quality Control Board (Water Board) staff received notice from the Town of Apple Valley (Town) that an Addendum to the Initial Study / Mitigated Negative Declaration (IS/MND) for the Bear Valley Road Bridge over the Mojave River Rehabilitation Project (Project) is being circulated for public review and comment. The addendum is needed because significant design changes have occurred in the Project since the Town approved the original IS/MND in March 2017. The Addendum to the IS/MND, prepared by Dokken Engineering on behalf of the Town, is being circulated for public review and comments in compliance with provisions of California Environmental Quality Act (CEQA) in order to solicit input on the potential impacts on the environment and ways in which those significant effects are proposed to be avoided or mitigated.

Water Board staff, acting as a responsible agency, is providing these comments to specify the scope and content of the environmental information germane to our statutory responsibilities pursuant to CEQA Guidelines, California Code of Regulations (CCR), title 14, section 15096. We thank the Town for providing Water Board staff the opportunity to review and comment on the Addendum to the IS/MND. Based on our review, we request the following be included in the environmental document: (1) establishment of a liaison with the Department of Water Resources to inform the Project manager of any releases of water from the Silverwood Reservoir, which could cause heavy flows in the Mojave River and impact this Project; (2) a more detailed discussion of stormwater collection, conveyance, and treatment; and (3) documentation that a Clean Water Act (CWA) rule 401 certification will be required for dredge-and-fill activities identified as part of the Project. Our comments on the amended IS/MND are detailed below.

PETER C. PUMPHREY, CHAIR | PATTY Z. KOUYOUMDJIAN, EXECUTIVE OFFICER

PROJECT DESCRIPTION

A 2014 CalTrans bridge inspection report found the bridge to be functionally obsolete and structurally deficient. The bridge carries an average of 56,000 vehicles per day with approximately five percent of that traffic being trucks. The proposed Project is to widen the Bear Valley Road Bridge over the Mojave River by nearly 50 feet to include six travel lanes with a concrete median and shoulders, rehabilitate and seismically retrofit portions of the existing structure, and to construct bike lanes and pedestrian paths on either side of the bridge. The widened bridge will be supported on large-diameter concrete piles extending 90 feet below grade.

SPECIFIC COMMENTS

1. On Thursday, February 14, 2019, the Department of Water Resources (DWR) released an unknown volume of water from the Silverwood Reservoir, located at the head waters for the Mojave River. The water was released because a large rainstorm had begun in the mountains and was expected to continue for three days. Downstream of the Cedar Springs dam approximately 23 miles, CalTrans was widening the Interstate 15 bridge across the Mojave River. This CalTrans project included cofferdams, bridge column widening, new column footings in the riverbed, a new frontage road, and two temporary bridges for heavy cranes to cross the River. By the morning of February 16, 2019, the Mojave River was flowing levee-to-levee in width and 20 feet deep, washing away the silt curtain, most of the sand used for the ramps of the temporary bridges. Repairs to the temporary bridges delayed the "critical path" of the project by more than two weeks.

Fortunately, all personnel and equipment had been removed from the riverbed before peak flow arrived. When working in the Mojave River, communication with DWR will be important to avoid a similar incident from occurring during your Project. Water Board staff request that the Project manager establish a liaison with DWR so they can coordinate construction activities in the riverbed with possible releases of water from Cedar Springs Dam.

2. Water Board staff re-iterate a comment made in their November 30, 2016 letter on the IS/MND: in the Geology and Soils section, or in the Hydrology and Water Quality section, the Project description should have more detail describing key Project components for stormwater collection, conveyance, and treatment. Water Board staff request this information to evaluate the Project's potential impact on hydrology and water quality resources.
3. The Addendum to the IS/MND states that the Project temporary disturbance area is 4.72 acres within a watershed of the US. Projects with greater than one acre of soil disturbance within a watershed of the US must obtain National Pollution Discharge Elimination System (NPDES) permit coverage with the local Regional Water Board. At the state level, that permit is known as Construction General

Permit (2009-0009-DWQ). If the erosivity factor "R" is less than 5, the Project will qualify for a Waiver, but be advised that Waivers are valid for only one year, and not likely be applicable to this Project. The Project proponent will need to submit permit registration documents (PRDs) to our database, the Stormwater Multi-Application Recording and Tracking System (SMARTS). If the Project *does not qualify for a Waiver*, the Project proponent must submit a stormwater pollution prevention plan (SWPPP) authored by a state-licensed qualified stormwater plan developer (QSD).

4. The Project will result in excavation in, discharge of fill to, and otherwise physical alteration of the Mojave River channel. Therefore, the Project proponent will be required to obtain either (1) a CWA, section 401 water quality certification for impacts to federal waters and/or (2) dredge and fill waste discharge requirements for impacts non-federal waters of the State, both of which are issued by the Lahontan Water Board. As part of that permitting process, the Project proponent will be required to avoid and minimize, to the extent possible, direct and indirect impacts to waters of the State. Information regarding these permits including application forms can be found online at http://www.waterboards.ca.gov/lahontan/water_issues/programs/clean_water_act_401/index.shtml. Early consultation with Water Board staff is highly encouraged.
5. Shallow groundwater will likely be encountered during construction and surface waters may be present in the Mojave River channel during and following storm events. Therefore, the IS/MND should fully describe and evaluate all potential dewatering and diversion activities that may be implemented as part of this Project. The locations of these features should be included on Project maps and site plans and included in the IS/MND.

Dewatering activities may be covered by the Construction General Permit. Early consultation with Water Board staff is highly encouraged.

Thank you for the opportunity to comment. If you have any questions regarding this letter, please contact me at (760) 241-7391 (Thomas.browne@waterboards.ca.gov) or Jan Zimmerman Senior Engineering Geologist, at (760) 241-7376 (jan.zimmerman@waterboards.ca.gov). Please send all future correspondence regarding this Project to the Water Board's email address at Lahontan@waterboards.ca.gov, be sure to include the State Clearinghouse No. and Project name in the subject line.



Tom Browne, PhD, PE
Water Resources Control Engineer

cc: State Clearinghouse (SCH 2016111018) (state.clearinghouse@opr.ca.gov)
California Department of Fish and Wildlife (AskRegion6@wildlife.ca.gov)