
Lahontan Regional Water Quality Control Board

April 2, 2020

File: Environmental Document Review
San Bernardino County

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Governor's Office of Planning & Research

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STATE CLEARINGHOUSE

Comments on the proposed Notice of Availability and Notice of Intent, Initial Study / Mitigated Negative Declaration Revision to Lockheed Martin Aeronautics & Radar Test Facility Revision, Helendale, San Bernardino County, SCH 2020039003

The Lahontan Regional Water Quality Control Board (Water Board) staff received the Initial Study and Proposed Mitigated Negative Declaration (IS/MND) for the above-referenced project (Project) on March 2, 2020. The IS/MND, prepared by Lockheed Martin Aeronautics and Radar Test Facility, was submitted in compliance with provisions of California Environmental Quality Act (CEQA) in order to solicit input on the potential impacts on the environment and ways to avoid and/or mitigate those impacts to the environment.

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 Lockheed Martin Aeronautics and Radar Test Facility for providing Water Board staff with the opportunity to review and comment on the IS/MND and for taking the initiative to develop the IS/MND with considerations to potential effects on water quality. Our comments are provided below.

We encourage Lockheed Martin Aeronautics and Radar Test Facility to take this opportunity to integrate elements into the Project that: (1) support low impact development (LID); and (2) incorporate storm water management as a primary Project component.

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

WATER BOARD'S AUTHORITY

All groundwater and surface waters are considered waters of the State. Surface waters include streams, lakes, ponds, and wetlands, and may include ephemeral, intermittent, or perennial waterways. All waters of the State are protected under California law. State law assigns responsibility for protection of water quality in the Lahontan Region to the Lahontan Water Board. Some waters of the State are also waters of the United States (US). The Federal Clean Water Act (CWA) provides additional protection for those waters of the State that are also waters of the US.

The *Water Quality Control Plan for the Lahontan Region* (Basin Plan) contains policies that the Water Board uses with other laws and regulations to protect the quality of waters of the State within the Lahontan Region. The Basin Plan sets forth water quality standards for surface water and groundwater of the Region, which include designated beneficial uses as well as narrative and numerical objectives which must be maintained or attained to protect those uses. The Basin Plan can be accessed via the Water Board's web site at http://www.waterboards.ca.gov/lahontan/water_issues/programs/basin_plan/references.shtml.

COMMENTS ON THE IS/MND

Based on our review of the information provided, we recommend that the following issues be considered and addressed in applicable sections of the final environmental document.

1. Water Board staff recommends that the Project description provide sufficient detail of key project activities and components, such as post-construction stormwater conveyance systems, to substantiate the findings of no significant impact, particularly related to hydrology and water quality issues.
2. Where feasible, we request that design alternatives be included so that stormwater runoff may be directed to areas where the stormwater may dissipate by percolation into the landscape rather than discharge directly towards surface waters.
3. The septic line should be located such that it is protected from scour and erosional processes.
4. Please note that obtaining a permit and conducting monitoring does not constitute adequate mitigation. Development and implementation of acceptable mitigation is required. The environmental document must specifically describe the BMPs and other measures used to mitigate Project impacts.
5. Low Impact Development Strategies (LID) – The foremost method of reducing impacts to watersheds from development is LID, the goals of which are maintaining landscape functionally equivalent to predevelopment hydrologic conditions and minimal generation of non-point source pollutants. LID results in

less surface runoff and potentially less impacts to receiving waters, the principles of which include:

- Maintaining natural drainage paths and landscape features to slow and filter runoff and maximize groundwater recharge;
- Reducing compacted and impervious cover created by development and associated road network; and
- Managing runoff as close to the source as possible.

Storm water control measures that are compatible with LID are preferred over more traditional methods. Examples include the use of bioretention swales, pervious pavement, and vegetated infiltration basins, all of which can effectively treat post-construction storm water runoff, help sustain watershed processes, protect receiving waters, and maintain healthy watersheds. Any one of these control measures may not be suitable, effective, or even feasible on every site, but the right combination, in the right places, can successfully achieve these goals.

6. We encourage Lockheed Martin Aeronautics and Radar Test Facility to identify post-construction storm water management as a significant Project component. A variety of BMPs that effectively treat post-construction storm water runoff, particularly maintaining native vegetation, should be evaluated as part of the Project.
7. Based on our experience in the Mojave Desert, native vegetation is the most efficient and cost-effective post-construction BMP to treat storm water runoff. Because revegetating disturbed soils in the desert is particularly challenging due to low rainfall, extreme climatic conditions, and relatively slow growth rates, we encourage Lockheed Martin Aeronautics and Radar Test Facility to maintain and mow existing vegetation where possible during construction. For projects where the native vegetation was maintained, we have observed that the need to implement temporary BMPs is greatly minimized and the costs associated with implementation and maintenance of post-construction BMPs is significantly reduced. Guidelines for implementing specific storm water control measures and additional information regarding sustainable storm water management can be accessed online at http://www.waterboards.ca.gov/water_issues/programs/low_impact_development
8. Storm Water Pollution Prevention Plan – A Project-specific Storm Water Pollution Prevention Plan (SWPPP) and implementation of site-specific erosion and sediment control BMPs is an effective way to reduce potentially significant water quality impacts to a less than significant level. To that end, we recommend that Lockheed Martin Aeronautics and Radar Test Facility prepare a Project-specific SWPPP during both the construction and post-construction phases of the Project. The SWPPP should be applicable to all areas of the Project site, including construction areas, access roads to and through the site, and staging and stockpile locations. Please note that temporary BMPs need to be

implemented for the Project until such time that permanent BMPs are in place and functioning.

9. Hydromodification is the alteration of the natural flow of water through a landscape (i.e. lining channels, flow diversions, culvert installations, armoring, etc.). Disturbing and compacting soils, changing or removing the vegetation cover, increasing impervious surfaces, and altering drainage patterns limit the natural hydrologic cycle processes of absorption, infiltration, and evapotranspiration, and increases the volume and frequency of runoff and sediment transport. Hydromodification results in stream channel instability, degraded water quality, changes in groundwater recharge processes, and aquatic habitat impacts. Hydromodification also can result in disconnecting a stream channel from its floodplain. Floodplain areas provide natural recharge, attenuate flood flows, provide habitat, and filter pollutants from urban runoff. Floodplain areas also store and release sediment, one of the essential processes to maintain the health of the watershed. We thank the Lockheed Martin Aeronautics and Radar Test Facility for establishing controls to prevent the effects of hydromodification and incorporating these controls into this Project.
10. Water Quality Objectives – The IS/MND should identify the water quality objectives that could potentially be violated by the Project and consider these standards when evaluating thresholds of significance for impacts. Water quality objectives and standards, both numerical and narrative, for **all** waters of the State within the Lahontan Region, including surface waters and groundwater, are outlined in Chapter 3 of the Basin Plan. Water quality objectives and standards are intended to protect the public health and welfare, and to maintain or enhance water quality in relation to the existing and/or potential beneficial uses of the water. It is these objectives and standards that should be used in the environmental review when evaluating thresholds of significance for Project impacts.
11. Flood Hazard – If construction of the Project results in land disturbance of more than 1 acre, coverage under National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities, Water Quality Order No. 2009-0009-DWQ would be required.
 - a. Water Quality Order 2009-0009-DWQ requires that a project shall not result in an exceedance of any applicable water quality objective for the receiving water. For this Project, the receiving waters are minor surface waters of the Upper Mojave Hydrologic Unit. The primary water quality parameters potentially affected by the Project include chemical constituents (as defined by California Code of Regulations, title 22), oil and grease, pH, and turbidity. Numeric and narrative Water Quality Objectives for these parameters in surface waters are outlined in Chapter 3 of the Basin Plan.

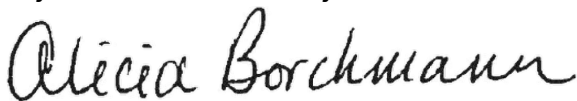
PERMITTING REQUIREMENTS

Several activities associated with the proposed Project may have the potential to impact waters of the State and, therefore, may require permits issued by either the State Water Board or Lahontan Water Board. The required permits may include the following.

1. Streambed alteration and/or discharge of fill material to a surface water may require a Clean Water Act (CWA), section 401 water quality certification for impacts to federal waters (waters of the U.S.), or dredge and fill waste discharge requirements for impacts to non-federal waters, both issued by the Lahontan Water Board. All unavoidable permanent impacts to waters of the State must be mitigated to ensure no net loss of beneficial use and wetland function and value.
2. Land disturbance of more than 1 acre may require a CWA, section 402(p) storm water permit, including a NPDES General Construction Storm Water Permit, obtained from the State Water Board, or individual storm water permit obtained from the Lahontan Water Board.

Please be advised of the permits that may be required for the proposed Project, as outlined above. The Project proponent is urged to consult with Water Board staff regarding these permitting actions. Information regarding these permits, including application forms, can be downloaded from our web site at <http://www.waterboards.ca.gov/lahontan>.

Thank you for the opportunity to comment on this IS/MND. If you have any questions regarding this letter, please contact me at (760) 241-7325 (alicia.borchmann@waterboards.ca.gov) or William Muir, Senior Engineering Geologist, at (760) 241-3523 (William.Muir@waterboards.ca.gov). Please send all future correspondence regarding this Project to the Water Board's email address at Lahontan@waterboards.ca.gov and be sure to include the State Clearinghouse No. and Project name in the subject line.



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Scientific Aid

cc: State Clearing House (SCH 2020039003) (state.clearinghouse@opr.ca.gov)
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