

## Lahontan Regional Water Quality Control Board

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File: Environmental Doc Review  
San Bernardino County

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### **Comments on the Initial Study and Mitigated Negative Declaration for City of Victorville Tentative Tract Map Plan 18-00039 (20188), San Bernardino County, State Clearinghouse No. 2021120538**

Lahontan Regional Water Quality Control Board (Water Board) staff received an Initial Study and Mitigated Negative Declaration (IS/MND) for the above-referenced Project (Project) on December 22, 2021. The IS/MND was prepared by the City of Victorville (City) and submitted in compliance with provisions of the California Environmental Quality Act (CEQA). 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 encourage the City to take this opportunity to integrate elements into the Project that (1) support low impact development (LID), and (2) reduce the effects of hydromodification. Our comments are outlined below.

#### **WATER BOARD'S AUTHORITY**

All groundwater and surface waters are considered waters of the State. 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. The Federal Clean Water Act (CWA) provides additional protection for those waters of the State that are also waters of the United States.

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](http://www.waterboards.ca.gov/lahontan/water_issues/programs/basin_plan/references.shtml)

## **WATER BOARD STAFF COMMENTS**

We recommend the following be included as part of the proposed Project and considered in the environmental review.

1. The foremost method of reducing impacts to watersheds from development is LID, the goals of which are maintaining a landscape functionally equivalent to predevelopment hydrologic conditions and minimal generation of non-point source pollutants. LID results in less surface runoff, 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 the associated road network; and managing runoff as close to the source as possible.

LID development practices that maintain aquatic values also reduce local infrastructure requirements and maintenance costs and benefit air quality, open space, and habitat. Vegetated areas for storm water management and infiltration onsite are valuable in LID. We encourage the City to establish LID implementation strategies that would be applicable for all development and redevelopment projects, including this Project.

2. Because increased runoff from developed areas is a key variable driving a number of other adverse effects, attention to maintaining the pre-development hydrograph will prevent or minimize many problems and will limit the need for other analyses and mitigation. However, traditional methods for managing storm water do not adequately protect the environment and tend to treat symptoms instead of causes. Such practices have led to channelization and stream armoring that permanently alter stream habitat, hydrology, and aesthetics, resulting in overall degradation of a watershed.

We encourage the City to establish specific storm water control measures and implementation strategies for the proposed Project. 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 particular 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.

Additional information regarding sustainable storm water management and LID can be accessed online at:  
[http://www.waterboards.ca.gov/water\\_issues/programs/low\\_impact\\_development](http://www.waterboards.ca.gov/water_issues/programs/low_impact_development).

3. The environmental document should include a mitigation measure that requires the preparation and implementation of a comprehensive Spill Prevention and Response Plan. This plan should outline the site-specific monitoring requirements and list the best management practices necessary to prevent hazardous material spills or to contain and cleanup a hazardous material spill, should one occur.
4. The Project proponent will be required obtain coverage under the statewide National Pollutant Discharge Elimination System General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities, Water Quality Order (WQO) 2009-0009-DWQ. As required by that permit, the Project proponent will need to prepare and implement a Project-specific Storm Water Pollution Prevention Plan (SWPPP) and contain the following information.
  - a. The SWPPP shall specify the site-specific erosion and sediment control Best Management Practices (BMPs) that will be implemented to reduce potentially significant water quality impacts to a less than significant level.
  - b. The SWPPP should be applicable to all areas of the Project, including construction areas, access roads to and through the site, and staging and stockpile locations.
  - c. Temporary BMPs must be implemented for all components of the Project until such time that permanent BMPs are in place and functioning.
  - d. All excess sediment excavated as part of the Project that is not used onsite should be stockpiled in a location such that it will not be transported by wind or water into a surface water. An adequate combination of sediment and erosion control BMPs must be implemented and maintained to temporarily stabilize all stockpiled sediment until such time that it is reused and/or permanently stabilized.
5. If the Project will result in streambed alteration and/or discharge of fill material to a surface water, the Project proponent may be required to obtain a 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.

If you have any questions regarding this letter, please contact me at (760) 241-7305 ([tiffany.steinert@waterboards.ca.gov](mailto:tiffany.steinert@waterboards.ca.gov)) or Jan Zimmerman, Senior Engineering Geologist, at (760) 241-7376 ([jan.zimmerman@waterboards.ca.gov](mailto: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](mailto:Lahontan@waterboards.ca.gov) and be sure to include the State Clearinghouse No. 2021120538 and Project name in the subject line.

A handwritten signature in cursive script that reads "Tiffany Steinert".

Tiffany Steinert  
Engineering Geologist

cc: California Department of Fish and Wildlife, Region 6 ([R6LSA@wildlife.ca.gov](mailto:R6LSA@wildlife.ca.gov))