Lahontan Regional Water Quality Control Board

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Los Angeles County

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Comments on the Notice of Preparation of an Environmental Impact Report for the Lockheed Martin Plant 10 Specific Plan Amendment, City of Palmdale, Los Angeles County, SCH 2022070108

Lahontan Regional Water Quality Control Board (Water Board) staff received a Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for the above-referenced project (Project) on July 7, 2022. The NOP included descriptions of the Project (including existing and proposed development potential), location, on-site conditions, land use zoning, surrounding uses, background and history, and potential environmental effects. The NOP was prepared by the city of Palmdale (City) and submitted in compliance with provisions of the California Environmental Quality Act (CEQA). The City requested written comments by August 5, 2022, on the scope and content of the environmental information provided in this NOP. In accordance with Water Board's statutory responsibilities, the following comments are provided in connection with the proposed Project. Furthermore, Water Board staff are providing input on the potential impacts on the environment and ways in which those significant effects can be avoided or mitigated. Due to the City's decision to prepare an EIR, an Initial Study was not prepared as permitted under CEQA Guidelines Section 15063(a).

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 (A) support low impact development (LID), (B) reduce the effects of hydromodification, and (C) encourage recycled water uses. Our comments on the NOP are outlined below.

PROPOSED PROJECT

The Project is the amendment of the Lockheed Martin Specific Plan, which was prepared and adopted in 1992. The Specific Plan is being amended to (1) create an

updated development plan that provides the flexibility of implementation based on the changing needs of the aviation industry and Lockheed Martin, (2) plan for adequate backbone infrastructure and parking to support future growth, and (3) enable streamlined permitting and approval process for future development.

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 be ephemeral, intermittent, or perennial. All waters of the State are protected under California law. State law assigns responsibility for protection of water quality in the Project area to the Lahontan Water Board. Some waters of the State are also waters of the U.S. 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 that 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 ENVIRONMENTAL REVIEW

1. The Potential Environmental Effects section of the NOP describes potential impacts to the environment for 21 categories. Water Board staff expects the Draft EIR to include not only a description for each category, but also an explanation of mitigation efforts that will be implemented to prevent or minimize Project impacts. Of particular concern to the Water Board are the Geology and Soils category (including potential for erosion of site soils and soil stability), the Hazards and Hazardous Materials category (including accidental conditions related to hazards and hazardous materials as a result of new development in the Project area), and the Hydrology and Water Quality category (including all of the listed issues). Regarding possible accidental releases of hazardous materials, all such releases to the environment should be reported to the Office of Emergency Services as soon as it is safe to do so.

2. In general, the construction of additional buildings and parking areas has the potential to hydrologically modify natural drainage systems. Of particular concern is the collection of onsite storm water runoff and the concentrated discharge of that storm water to natural drainage channels. Design alternatives that are compatible with LID should be considered. 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

and potentially less impacts to receiving waters. LID principles include (a) maintaining natural drainage paths and landscape features to slow and filter runoff and maximize groundwater recharge, (b) reducing compacted and impervious cover created by development and the associated road network, and (c) 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. The use of any infiltration basin must consider the quality of the groundwater beneath the site and avoid constructing infiltration basins over any areas of known soil or groundwater contamination. 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.

3. We encourage the City and Lockheed Martin to identify post-construction storm water management as a significant Project component, and a variety of Best Management Practices (BMPs) that effectively treat post-construction storm water runoff, particularly maintaining native vegetation, should be evaluated as part of the Project.

   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 the City 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

4. Because increased runoff from developed areas is a key variable driving several 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. Traditional methods for managing urban 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.

5. 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.

6. 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 BMPs necessary to prevent hazardous material spills or to contain and cleanup a hazardous spill, should one occur. The plan should also describe those releases of hazardous materials to the environment should be reported to the Office of Emergency Services as soon as it is safe to do so.

7. The Project is located within the Antelope Hydrologic Unit (Hydrologic Unit No. 626.00) and overlies the Antelope Valley groundwater basin (Basin No. 6-44). The beneficial uses of these waters are listed either by watershed (for surface waters) and by groundwater basin (for groundwater) in Chapter 2 of the Basin Plan, referenced above. The proposed Project should identify and list the beneficial uses of all water resources within the Project area.

8. All excess soil excavated as part of the Project that is not used onsite should be stockpiled in an upland 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 the stockpiled soils until such time that they are reused and/or permanently stabilized.

9. Water Board staff recommends that the Draft EIR include sufficient detail of key Project components, particularly post-construction storm water conveyance and collection, to document that the Project will not have a significant effect on the environment (e.g., hydrology and water quality resources).

10. Where feasible, we request that design alternatives be considered that direct stormwater runoff to areas where they will dissipate by percolation into the landscape rather than discharge directly to surface waters. However, percolation areas such as retention basins, should not be located over areas of groundwater contamination as infiltrating water can cause groundwater contamination plumes to move and/or spread. Water Board staff request that the Draft EIR provide a map showing the locations of existing groundwater monitoring wells and a summary of any groundwater contamination detected at Lockheed Martin Plant 10.

11. Water Board staff recommend that any septic lines be buried below the effects of potential scour and erosion or located under pavement.

12. 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 the Draft EIR require a Project-specific SWPPP during both the construction and post-construction phases of future development projects. 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.

13. Please note that temporary BMPs need to be implemented for the Project until such time that permanent BMPs are in place and functioning.

14. The environmental document should identify the water quality standards 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.

15. Please note that obtaining a permit and conducting monitoring does not constitute adequate mitigation. Development and implementation of acceptable mitigation is required. The Draft EIR must specifically describe the BMPs and other measures used to mitigate Project impacts.

COMMENTS ASSOCIATED WITH PERMITTING REQUIREMENTS

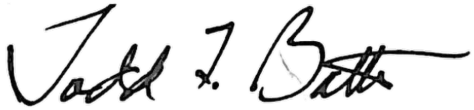
A number of activities associated with the proposed Project may have the potential to impact waters of the State and, therefore, may require permits issued by either the State Water Resources Control Board (State Water Board) or Lahontan Water Board. The required permits may include the following:

16. Land disturbance of more than 1 acre may require a CWA, section 402(p) storm water permit, including a *National Pollutant Discharge Elimination System (NPDES) General Construction Storm Water Permit*, Water Quality Order (WQO) No. 2009-0009-DWQ, obtained from the State Water Board, or individual storm water permit obtained from the Lahontan Water Board.

17. Streambed alteration and/or discharge of fill material to a surface water may require 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.

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 the NOP. If you have any questions regarding this letter, please contact me at (760) 241-7340, (Todd.Battey@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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cc: State Clearing House (SCH 2022070108) (state.clearinghouse@opr.ca.gov)
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