



Santa Ana Regional Water Quality Control Board

August 12, 2022

Governor's Office of Planning & Research

Chris Jones
San Bernardino Valley Municipal Water District
380 East Vanderbilt Way
San Bernardino, CA, 92408

Aug 15 2022

STATE CLEARINGHOUSE

Email Chrisj@SBVMWD.com

**NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT,
CACTUS BASINS PIPELINE AND RECHARGE PROJECT, CITY OF RIALTO, NO
SCH NO.**

Dear Mr. Jones:

Staff of the Regional Water Quality Control Board, Santa Ana Region (Santa Ana Water Board) has reviewed the Notice of Preparation for a Draft Environmental Impact Report (DEIR) for the Cactus Basins Pipeline and Recharge Project (Project), proposed for the upper four Cactus Basins (Basins 5, 4, and 3/3A) south of Interstate 210 in eastern Rialto. A new pipeline would be constructed to divert metered flows of State Project water from the Devil Canyon Azusa Pipeline at North Riverside Drive, Rialto, to the Rialto Storm Drain along Locust Avenue. An existing San Bernardino County Flood Control District (Flood Control) storm drain would then convey these flows to Basin 5. The Project goal is to recharge high-quality imported water into the Rialto-Colton "groundwater subbasin" or Groundwater Management Zone (GMZ).

Santa Ana Water Board staff recommends that the DEIR incorporate the following comments in order for the Project to best protect water quality standards (numerical and narrative water quality objectives, designated beneficial uses, and the antidegradation policy), as defined in the Water Quality Control Plan for the Santa Ana River Basin, as amended (i.e., Basin Plan):

1. We have included our November 2, 2012 letter to the San Bernardino County Flood Control District as our comments regarding use of the Cactus Basins remain relevant to the San Bernardino Valley Municipal Water District (Water District). We understand that the Water District has likely reviewed our recommendations in the 2012 letter, given that the Water District is now analyzing the potential environmental impacts from the Project.

KRISTINE MURRAY, CHAIR | JAYNE JOY, EXECUTIVE OFFICER

In particular, Santa Ana Water Board staff requests that the Water District's DEIR address our concerns regarding the likelihood that sustained recharge will result in migration, expansion, and/or comingling of existing groundwater plume(s) beneath the Basins. The current extent of the plume should be documented with diagrams in the proposed DEIR. In addition, Santa Ana Water Board staff recommends that the Water District conduct groundwater flow modeling to predict the potential risk to the underlying groundwater aquifer and potential dynamic effect on groundwater plume(s) and their path of migration. Model predictions need to be supported and validated by conducting groundwater monitoring at appropriate locations.

2. The previous Flood Control project intended temporary detention compared to long-term retention. Santa Ana Water Board staff wrote in the enclosed 2012 letter, "*Because any future recharge project would constitute a change from the currently proposed Project, the lead agency would be obligated to analyze the environmental impacts of a proposed recharge project at this site in an additional supplemental EIR (or similar document) at that time, in compliance with the California Environmental Quality Act (CEQA).*" We have no comment on the pipeline connections themselves.

If you have any questions, please contact Glenn Robertson at (951) 782-3259 and Glenn.Robertson@waterboards.ca.gov, or me at (951) 782-4995 and Terri.Reeder@waterboards.ca.gov

Sincerely,

Terri S. Reeder, PG, CEG, CHG
Supervisor, Coastal Waters Planning and CEQA Section

Enclosure: November 2, 2012 Letter

Cc w/Encl:

U.S. Army Corps of Engineers, Los Angeles office – Stephen Estes
Stephan.M.Estes@usace.army.mil

California Department of Fish and Wildlife, Ontario – Breanna Machuca,
Breanna.Machuca@wildlife.ca.gov

U.S. Fish and Wildlife Service, Palm Springs – Karin Cleary-Rose
Karin_Cleary-Rose@fws.gov

State.clearinghouse@opr.ca.gov

Drive R: R8/ Shared/ Section/ Planning/ CEQA/ CEQA-NEPA Response Letters from Reg 8 to All Regional Projects/ CEQA Letters for Cases, San Bernardino County sites/ Rialto / Cactus Basins Pipeline and Recharge.docx



EDMUND G. BROWN JR.
GOVERNOR

MATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

Santa Ana Regional Water Quality Control Board

November 2, 2012

John Schatz
San Bernardino County Flood Control District
825 East Third Street, Rm 201
San Bernardino, CA 92415-0835

NOTICE OF PREPARATION FOR A DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT, UPPER CACTUS BASINS ENHANCEMENT PROJECT, NORTHERN RIALTO -- SAN BERNARDINO COUNTY FLOOD CONTROL DISTRICT, SCH# 1987110914

Dear Mr. Schatz:

Regional Board staff (Board staff) has reviewed the September 20, 2012 submittal entitled Notice of Preparation (NOP) for a Draft Supplemental Environmental Impact Report (DSEIR) for the Upper Cactus Basins Enhancement Project (Project) in the City of Rialto. The Project site is located south of Interstate 210, between North Ayala Drive and North Cactus Avenue.

In 1988, the Rialto City Council certified an EIR for the construction of a project at this site consisting of three adjacent, unlined stormwater retention basins in sequence, with the second and third basins connected by a lined concrete channel. However, the NOP states that none of the improvements to the basins were constructed, and the overall objective of these basins, i.e., to provide 100-year flood protection, was never realized beyond the existing site excavations for sand and gravel. It was also originally envisioned that after completion of the basins as described in the 1988 EIR, the San Bernardino Valley Municipal Water District would use the basins for groundwater recharge. A DSEIR is now necessary because of changes in environmental regulations since 1988, and recognition of the likely presence of sensitive alluvial fan scrub species (San Bernardino kangaroo rat, California coastal gnatcatcher, etc.) in the Project area.

The current proposal is to enlarge all basins to a minimum 100-year stormflow capacity and to enhance management capability for temporary detention, with drainage toward the south. The proposed basin design is for flood control purposes only, not for retention as described in the 1988 EIR. Although not mentioned in the NOP, the Project site overlies the southwestern extent of the B.F. Goodrich perchlorate and trichloroethylene (TCE) plume. The B.F. Goodrich plume originates from a 160-acre area in Rialto bound by West Casa Grande Drive on the north, Locust Avenue on the east, Alder Avenue on the west, and the extension of Summit Avenue on the south. The B.F. Goodrich plume extends approximately 4.2 miles in the southeasterly direction. Rialto Well No. 4, located on the southwest corner of East Base Line Road and North Cactus Avenue, is impacted with perchlorate and TCE. This inactive supply well is believed to be located at the southwestern edge of the B.F. Goodrich plume. Although the limited, seasonal infiltration of storm water runoff in these basins might not be expected to affect the current

movement of the plume, the DSEIR should acknowledge the presence of this plume beneath the Project site, and evaluate the potential for any adverse impacts the Project could have on the underlying plume.

Although the basins are not currently designed as retention basins, if formal recharge operations are considered in the future (as previously contemplated), then continuous infiltration could cause commingling with the plume. A greater volume retained in the basins, having a higher water column than that of residual seasonal runoff mentioned above, would likely accelerate the infiltration rate and downward velocity of the basin water directly to the water table through the site's medium- to coarse-grained sediments (the underlying alluvial fan). Because any future recharge project would constitute a change from the currently proposed Project, the lead agency would be obligated to analyze the environmental impacts of a proposed recharge project at this site in an additional supplemental EIR (or similar document) at that time, in compliance with the California Environmental Quality Act (CEQA).

The NOP states that the U.S. Army Corps of Engineers (USACE) will issue a Clean Water Act (CWA) Section 404 Permit (404 Permit) regulating this proposed dredge and fill operation in waters of the U.S. that are associated with this Project. The DSEIR should clarify that as a prerequisite to the 404 Permit, the proponent will need to obtain a CWA Section 401 Water Quality Standards Certification from the Regional Board, which will set conditions requiring mitigation for avoiding, minimizing or mitigating impacts to water quality standards posed by the excavations. Mitigation planning for the Project should consider enhancement or restoration revegetation of alluvial fan scrub outside of the basins in order to establish contiguous habitat for sensitive species, and/or participation in established adjacent offsite preserves.

As a co-permittee under Regional Board Order No. RB8-2010-0036 (NPDES No. CAS618036) (known as the San Bernardino County "MS4 Permit"), the San Bernardino County Flood Control District is required to implement Best Management Practices (BMPs) for the Project in order to minimize downstream sedimentation, consistent with BMPs implemented under the statewide General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (SWRCB Order No. 2009-0009-DWQ, NPDES No. CAS000002), including development of a Storm Water Pollution Prevention Plan.

Please contact Glenn Robertson of our Regional Planning Programs Section at (951) 782-3259 or at Glenn.Robertson@waterboards.ca.gov, or me at (951) 782-3234 or at Mark.Adelson@waterboards.ca.gov

Sincerely,



Mark G. Adelson, Chief
Regional Planning Programs Section

cc: State Clearinghouse
U.S. Army Corps of Engineers, Los Angeles – James Mace

X:Groberts on Magnolia/Data/CEQA/CEQA Responses/NOP – San Bern Flood Control, City of Rialto – Upper Cactus Basin Enhancement Project, Cactus Ave at Baseline-MGA-RLH-Final.doc