
Santa Ana Regional Water Quality Control Board

August 9, 2022

Oliver Mujica, Planning Division Manager
City of San Bernardino Community and Economic Development
201 North E Street, 3rd Floor
San Bernardino, CA, 92401

Governor's Office of Planning & Research

Aug 10 2022

STATE CLEARINGHOUSE

Email Mujica_Ol@SBCity.org

NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT, DOWNTOWN SAN BERNARDINO, CITY OF SAN BERNARDINO, NO SCH NO.

Dear Mr. Mujica:

Staff of the Regional Water Quality Control Board, Santa Ana Region (Santa Ana Water Board) has reviewed the Notice of Preparation (NOP) for a Draft Environmental Impact Report (DEIR) for the Downtown San Bernardino Specific Plan (Project). The City of San Bernardino (City) requests comments regarding what should be discussed in a DEIR, prior to the completion of a major plan to improve the downtown area of San Bernardino. The Specific Plan area extends, from west to east, between Interstate 215 and Sierra Way, and from 8th Street at the northern Project boundary to the railroad tracks south of Rialto Avenue. The Specific Plan anticipates the restoration and reuse of buildings and the demolition of others, as well as new options for housing, transit, restaurants, food stands, and cultural presentation.

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. The DEIR should discuss that the City of San Bernardino is a co-permittee in the Santa Ana Water Board's Order No. R8-2010-0036, NPDES No. CAS618036, Waste Discharge Requirements for the Area-Wide Urban Storm Water Runoff Management Program, with other San Bernardino County cities and the County Flood Control District. This permit is also known as the San Bernardino County Municipal Separate Storm Sewer Systems or MS4 Permit. As part of MS4 implementation the City will have oversight over the Project's many construction projects that will have wet and dry weather runoff, which likely will have a variety of contaminants. The existing storm sewer system would generally carry these flows to the Santa Ana River (SAR), located to the immediate southeast of the Project

area. Therefore, the DEIR should discuss how demolition and construction sites will deploy Best Management Practices (BMPs), in compliance with the MS4 Permit, to limit or prevent pollutants reaching the SAR.

Further, the DEIR should discuss that numerous projects of at least one acre in size would each appear to need coverage under the State Water Resources Control Board's General Permit For Storm Water Discharges Associated With Construction Activity (Construction General Permit), Order No. 2009-0009-DWQ. Each project within the Specific Plan would likely develop a Storm Water Pollution Prevention Plan (SWPPP). We encourage discussion of this with our Inland Stormwater Section Supervisor, Adam Fischer, at Adam.Fischer@waterboards.ca.gov

2. The NOP (p. 6) indicates that among environmental topics commonly analyzed in an Environmental Impact Report, Geology and Soils will be omitted. We believe that a geotechnical discussion is needed in the DEIR for this planned urban renewal, within this seismically active region. A DEIR chapter on Geology should include current depth to groundwater, historical groundwater elevations, and the mapping of liquefaction potential (Seismic Hazard Protection Act maps)—all previous issues of concern for downtown San Bernardino. After heavy rains in 2004-2004 resulted in significant groundwater recharge, the City even considered forming a downtown “lakes” promenade around “daylighted” groundwater, but this project was discarded when chronic drought ensued and groundwater levels receded. Please discuss whether lined or unlined water bodies are projected to exist in the Project. If dewatering will be necessary during Project implementation, please note this in the DEIR and that the Santa Ana Water Board must be contacted (currently, Ryan Harris at Ryan.Harris@waterboards.ca.gov).

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

Cc: State.clearinghouse@opr.ca.gov