



Santa Ana Regional Water Quality Control Board

February 20, 2024

Bridgette Burton
Big Bear Area Regional Wastewater Agency
121 Palomino Drive
Big Bear City, CA 92314

Governor's Office of Planning & Research

February 20 2024

STATE CLEARINGHOUSE

Via email: bburton@bbarwa.org

DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT, REPLENISH BIG BEAR PROGRAM, BIG BEAR AREA REGIONAL WASTEWATER AGENCY, STATE CLEARINGHOUSE NO. 2022110595

Dear Bridgette Burton:

Santa Ana Regional Water Quality Control Board (Santa Ana Water Board) staff has reviewed the Draft Program Environmental Impact Report (DPEIR) for the Replenish Big Bear Program (Program). The Santa Ana Water Board appreciates the opportunity to provide comments on the Program.

PROGRAM SUMMARY

In general, the Program includes permitting, design, and construction of an advanced water purification facility at the existing Big Bear Area Regional Wastewater Agency Wastewater Treatment Plant. Additionally, the Program includes approximately 6.59 miles of pipeline for product water and reverse osmosis brine minimization, three pump stations, groundwater recharge, and up to four monitoring wells.

As part of the Program, up to 2,200-acre feet per year of water is proposed to be discharged at the east end of Stanfield Marsh, which will then flow into Big Bear Lake. Additionally, up to 380-acre feet per year of water stored in Big Bear Lake will be used for groundwater recharge at the Sand Canyon Recharge Area over a six-month dry weather period.

The overall Program area consists of Big Bear Valley, which is located in the San Bernardino Mountains in San Bernardino County. The Program will span just east of Big Bear Lake to the wastewater treatment plant at Baldwin Lake and then south to Shay Pond, and southeast of Big Bear Lake to the southeast of Resort Storage Pond and Sand Canyon Recharge Area.

KRISTINE MURRAY, CHAIR | JAYNE JOY, EXECUTIVE OFFICER

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COMMENTS

Based on the DPEIR documents, the Santa Ana Water Board offers the comments below to assist in adequately identifying, avoiding, and/or mitigating the Program's significant or potentially significant environmental impacts.

In 2006, the Santa Ana Water Board adopted a Nutrient Total Maximum Daily Load (TMDL) for Dry Hydrologic Conditions in Big Bear Lake for inclusion into the Water Quality Control Plan for the Santa Ana River Basin (Basin Plan). The TMDL was adopted to establish the appropriate numeric targets to protect the beneficial uses of Big Bear Lake, along with an implementation plan to attain the TMDL targets. Table 6-1a-c in [Basin Plan](#) specifies TMDL numeric targets for Big Bear Lake.

Comment # 1

Tables 3-4, 4.11-6, and 4.11-9 incorrectly refer to the TMDL numeric targets for total phosphorus and chlorophyll-a as TMDL objectives.

Comment # 2

Table 3-3 references a total nitrogen numeric target. The adopted Big Bear Lake TMDL does not include a total nitrogen numeric target.

Comment # 3

The DPEIR (including Table 4.11-6) only references narrative objectives for Shay Pond and Stanfield Marsh and does not include references to parameter-specific narrative objectives (i.e., UIA, dissolved oxygen, pH, etc.). The Basin Plan refers to most objectives as narrative except for waterbody-specific numeric objectives listed in Table 4-1. However, parameter-specific narrative objectives apply to all inland surface waters within the Santa Ana Region, including lakes, streams, and wetlands. Where more than one objective is applicable, the stricter shall apply.

Comment # 4

The DPEIR states that Big Bear Lake has the same or more stringent water quality objectives than downstream receiving waters therefore meeting the objectives of Big Bear Lake, will also meet the water quality objectives of all downstream receiving waters, so it can be concluded that downstream uses will be protected. However, Table 4.11.9 does not include Bear Creek, immediately downstream of Big Bear Lake, which has more stringent objectives for hardness, sodium, and sulfate.

Comment # 5

The DPEIR explains that if the Baldwin Lake Pipeline Alignment Option is chosen as part of the Stanfield Marsh/Big Bear Lake Discharge Point 1, the pipeline alignment will adversely impact the bird-foot checkerbloom (*Sidalcea pedate*), a state and federally endangered plant species. However, if not selected, a significant impact on biological resources will be avoided. Santa Ana Water Board staff recommend that other pipeline

alignment options be considered for the Stanfield Marsh/Big Bear Lake Discharge Point 1.

Comment #6

The DPEIR states that Baldwin Lake, Caribou Creek, Shay Pond/Shay Creek, and Sand Canyon Channel are not considered waters of the United States. The identification and location of jurisdictional water of the United States, is determined by the U.S. Army Corps of Engineers, Santa Ana Water Board staff request an Approved Jurisdictional Determination for Baldwin Lake, Caribou Creek, Shay Pond/Shay Creek, and Sand Canyon Channel.

CONCLUSION

The Santa Ana Water Board appreciated the opportunity to comment on the Program's DPEIR. Santa Ana Water Board staff request our comments and concerns be addressed prior to adoption of the final PEIR.

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

Sincerely,

Terri S. Reeder, PG, CEG, CHG
Supervisor, Coastal Waters Planning and CEQA Section
Santa Ana Regional Water Quality Control Board

Cc:

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