
Lahontan Regional Water Quality Control Board

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File: Environmental Doc Review
Los Angeles County

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**Comments on the Notice of Preparation of a Draft Environmental Impact Report
for the Centennial Development Project, Los Angeles County, State
Clearinghouse Number 2004031072**

The Notice of Preparation of a Draft Environmental Impact Report (DEIR) for the above-referenced project (Project) was prepared by the County of Los Angeles Planning Department (County) and circulated for public comment in compliance with provisions of the California Environmental Quality Act (CEQA). As a responsible agency, the California Regional Water Quality Control Board, Lahontan Region (Water Board) 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, title 14, section 15096. Based on our review of the proposed Project, we recommend that several issues be considered in the preparation of the Notice of Preparation (NOP), particularly: 1) established numerical and narrative water quality objectives and standards should be used when evaluating thresholds of significance for Project impacts; (2) post-construction best management practices (BMPs) for stormwater control are an essential part of project planning and should be discussed in the DEIR; and 3) all potential downstream impacts to hydrology and water quality must be evaluated as a result of Project implementation. Our comments on the Project are outlined below.

Project Overview

The Centennial Project is a large residential-commercial development that will include 19,333 dwelling units on an area of a total of 12,323 acres in western Antelope Valley, 36 miles west of Lancaster. Approximately 6,700 acres of land will be developed into a series of communities over a 20 year period, and approximately 5,600 acres of land will be preserved for open space for drainages and conservation. New infrastructure facilities including shopping centers, water treatment facilities, water banking facilities will be built on approximately 180 acres, while approximately 140 acres will be set aside for K-12 schools. Commercial buildings will occupy approximately 100 acres, hospitals, medical facilities, and higher education buildings will occupy approximately 110 acres, and recreational and entertainment facilities will occupy approximately 80 acres.

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 Lahontan Region 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 U.S.

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.

Specific Issues to be Considered in the NOP

Based on our review of the information provided, we recommend that the following issues be considered in preparation of the DEIR.

1. The DEIR should identify all the applicable water quality standards that pertain to this project and identify which standards could potentially be violated by Project alternatives and use 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.
2. The Project area is located within the Neenach Hydrologic Area of the Antelope Hydrologic Unit, 626.00. The Project area lies over the Antelope Valley groundwater basin (Department of Water Resources unit 6-44). We note that the NOP in section 3.e. does not include the Basin Plan in its list of relevant plans. The beneficial uses of minor surface waters and wetlands are listed in Chapter 2 of the Basin Plan. The DEIR should identify and list all the beneficial uses of the surface water and groundwater resources within the Project area, and include an analysis of the potential impacts to water quality and hydrology with respect to those beneficial uses.
3. Healthy watersheds are sustainable. Watersheds supply drinking water, provide for recreational uses, and support ecosystems. Watershed processes include the movement of water (i.e. infiltration and surface runoff), the transport of sediment, and the delivery of organic material to surface waters. These processes create and sustain the streams, lakes, wetlands, and other receiving waters of the Antelope Hydrologic Unit, including groundwater. The DEIR should discuss the project components and their potential impacts to watersheds on the project area.

4. The DEIR should describe a proposed long-term maintenance and monitoring plan that will be implemented to evaluate and maintain the established baseline conditions. Specific routine and non-routine activities should be identified, such as dredging/excavation and re-contouring, and the thresholds that will trigger when maintenance activities are warranted.
5. The DEIR should describe the long-term post-construction best management practices (BMPs) maintenance plan. It is understood that routine sediment removal is necessary to maintain the function of a basin, and the removal of accumulated sediments in the bottom of a basin would completely remove any vegetation that may have been present. However, we also recognize the benefits of vegetation for water quality by filtering sediments and constituents of concerns from water. We strongly recommend that the County proponent include in their long term maintenance plan provisions for mowing rather than eradication, so that vegetation can more easily reestablish itself post-maintenance. Maintaining healthy deep-rooted vegetation is crucial to soil stabilization. Re-contouring and vegetation grubbing should only be done on an as-needed basis.
6. The DEIR should describe the project design standards used for sizing and constructing hydraulic features. Surface waters support a variety of beneficial uses including municipal and agricultural uses, groundwater and fresh water recharge, habitat, flood attenuation, and water quality enhancement. To ensure that no net loss of function and value will occur as a result of Project implementation, we request that culverts be designed to (1) pass storm flows without impoundment upstream, (2) with sufficient energy dissipation provided at the outlet to reduce flow velocities to pre-Project conditions, and (3) sufficiently sized to allow for habitat connectivity across/beneath the roadway.
7. All rock slope protection and energy dissipation rip-rap placed within stream channels should be **ungrouted** and the minimum amount necessary to provide scour protection and energy dissipation to prevent erosion. The DEIR should describe channel design and energy dissipation to prevent erosion. The DEIR should describe channel design criteria.
8. Construction and post-construction storm water management must be considered a significant Project component, and BMPs that effectively treat storm water runoff should be included as part of the Project. The DEIR should specify those temporary and permanent long-term sediment and erosion control BMPs that will be implemented to mitigate potential water quality impacts related to stormwater. The temporary BMPs need to be implemented for the Project until such time that vegetation has been restored to pre-Project conditions. We request that vegetation clearing be kept to a minimum and, where feasible, existing vegetation be mowed so that vegetation could more readily reestablish post-construction. A long-term BMP maintenance plan should be included in the DEIR.
9. The DEIR should identify all impacts to water resources and describe how impacts were avoided, minimized, or proposed to be mitigated. The Water Board requires that impacts to water resources be avoided where feasible and minimized to the extent practical. Compensatory mitigation will be required for all unavoidable permanent impacts to surface water resources. Water Board staff coordinate all mitigation requirements with staff from other federal and state regulatory agencies,

including the USACE and the California Department of Fish and Wildlife. In determining appropriate mitigation ratios for impacts to waters of the State, Water Board staff considers Basin Plan requirements (minimum 1.5:1 mitigation ratio for impacts to wetlands) and utilizes *12501-SPD Regulatory Program Standard Operating Procedure for Determination of Mitigation Ratios*, published December 2012 by the USACE, South Pacific Division.

10. All temporary impacts to water resource and upland areas should be restored (recontoured and revegetated) to match pre-Project conditions. A Restoration and Revegetation Monitoring Plan should be prepared and described in the DEIR that requires monitoring for some period of time (usually no less than 3 years), outlines a schedule with performance measures to be met in order for the restoration/revegetation to be deemed successful, and contains adaptive management criteria in the event performance measures are not being met.
11. Equipment staging areas, excavated soil stockpiles, and hazardous materials (i.e. oils and fuels) should be sited in upland areas outside surface waters and adjacent flood plain areas. We recommend that a comprehensive Spill Prevention and Response Plan be prepared and described in the DEIR that outlines the site-specific monitoring requirements and lists the BMPs necessary to prevent hazardous material spills or to contain and cleanup a hazardous material spill, should one occur.
12. Buffer areas should be identified and exclusion fencing used to protect water resources and to prevent unauthorized vehicles or equipment from entering or otherwise disturbing the surface waters. Equipment should use existing roadways to the extent feasible. These features should be described in the DEIR.
13. The project plans to construct and operate a domestic wastewater treatment plant. The plant will produce recycled water for use within the project area. Onsite disposal of treated wastewater must not cause pollution and minimize degradation. Denitrification should be included in the plant design. The DEIR should fully describe the following.
 - a. Treatment plant and disposal pond locations,
 - b. Treatment plant design criteria,
 - c. Storage and disposal pond design criteria,
 - d. Expected wastewater quality,
 - e. Receiving groundwater quality,
 - f. Expected receiving groundwater degradation (nature and extent) resulting from the discharge according to State Board Resolution 68-16,
 - g. Background receiving groundwater quality and direction of flow established from a statistically significant data set,
 - h. Location and well construction design of monitoring wells installed to evaluate groundwater quality,
 - i. Lift station locations and design,
 - j. Backup power features,
 - k. Recycled water storage, delivery, and use area design standards, and
 - l. Entity responsible for owning and operating the treatment plant and recycled water infrastructure.

Permitting Requirements

A number of activities associated with the proposed Project 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.

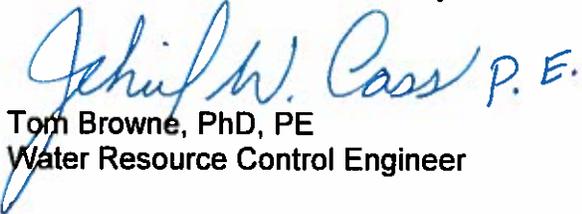
14. Streambed alteration and/or discharge of fill material to a surface water may require a CWA, section 401 water quality certification for impacts to federal waters (waters of the U.S.), or dredge and fill waste discharge requirements for impacts to non-federal waters, both issued by the Lahontan Water Board.
15. 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) 2009-0009-DWQ, obtained from the State Water Board, or individual storm water permit obtained from the Lahontan Water Board if water of the United States are affected. The DEIR should identify where waters of the United States are present within the project area. The Water Board may establish individual waste discharge requirements to address stormwater impacts to state only waters.
16. New industrial operations may require coverage under the Industrial General Stormwater Permit (2014-0057-DWQ) if waters of the United States are affected. Information on the Industrial General Stormwater Permit is available on the State Water Board's web site at http://www.swrcb.ca.gov/water_issues/programs/stormwater/industrial.shtml. These permits must be obtained from the Lahontan Water Board.
17. Disposal from wastewater treatment facilities will require a waste discharge requirements which must be obtained from the Lahontan Water Board. Information on what information is needed in a report of waste discharge is available on the State Water Board's web site at http://www.waterboards.ca.gov/water_issues/programs/land_disposal/waste_discharge_requirements.shtml
18. Water diversion and/or dewatering activities may be subject to discharge and monitoring requirements under either NPDES General Permit, Limited Threat Discharges to Surface Waters, Board Order R6T-2014-0049, or General Waste Discharge Requirements for Discharges to Land with a Low Threat to Water Quality, WQO-2003-0003, both issued by the Lahontan Water Board. The DEIR should identify any and all proposed diversion or dewatering actions.
19. Recycled water uses are subject to water reclamation and waste discharge requirements issued by the Water Board. An Engineering Report must be submitted to the Water Board and State Division of Drinking Water, which also must approve the Engineering Report.

Please be advised of the permits that may be required for the proposed Project, as outlined above. The specific Project activities that may trigger these permitting actions should be identified in the appropriate sections of the NOP. The Project proponent should consult with Water Board staff early on should Project implementation result in activities that trigger

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) 241-7391 thomas.browne@waterboards.ca.gov or Jehiel Cass, Senior Water Resource Control Engineer, at (760) 241-2434 jehiel.cass@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 Number, when available, and Project name in the subject line.

for  P. E.
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Water Resource Control Engineer

cc: USEPA Wetlands Regulatory Office, Region 9 (R9-WTR8-Mailbox@epa.gov)
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