California Regional Water Quality Control Board
Lahontan Region

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San Bernardino County

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COMMENTS ON THE PRELIMINARY STAFF ASSESSMENT FOR THE VICTORVILLE 2 HYBRID POWER PROJECT (07-AFC-1), LOCATED APPROXIMATELY 3.5 MILES EAST OF HIGHWAY 395 AND APPROXIMATELY 0.5 MILE WEST OF THE MOJAVE RIVER, NORTHEAST OF COLUSA AND HELENDALE ROADS, IN THE CITY OF VICTORVILLE

Please refer to the items checked for staff comments on the above-referenced project:

[X] The site plan for this project does not specifically identify features for the post-construction period that will control stormwater on-site or prevent pollutants from non-point sources from entering and degrading surface or ground waters. The foremost method of reducing impacts to watersheds from urban development is "Low Impact Development" (LID), the goals of which are maintaining a landscape functionally equivalent to predevelopment hydrologic conditions and minimal generation of nonpoint source pollutants. LID results in less surface runoff and potentially less impacts to receiving waters. Principles of LID include:

- Maintaining natural drainage paths and landscape features to slow and filter runoff and maximize groundwater recharge,
- Reducing the impervious cover created by development and the associated transportation network, and
- Managing runoff as close to the source as possible.

We understand that LID development practices that would maintain aquatic values could also reduce local infrastructure requirements and maintenance costs, and could benefit air quality, open space, and habitat. Planning tools to implement the above principles and manuals are available to provide specific guidance regarding LID.

We request you require these principles to be incorporated into the proposed project design. We request natural drainage patterns be maintained to the extent feasible. Future development plans should consider the following items:

[X] The project requires development of a Stormwater Pollution Prevention Plan and
[X] a NPDES General Construction Stormwater Permit and/or
[X] a NPDES General Industrial Stormwater Permit

These permits are accessible on the State Board's Homepage (www.waterboards.ca.gov). Best Management Practices must be used to mitigate project impacts. The environmental document must describe the mitigation measures or Best Management Practices.

[X] The proposal does not provide specific information on how impacts to surface Waters of the State and/or Waters of the U.S. will be mitigated. These surface waters include, but are not limited to, drainages, streams, washes, ponds, pools or wetlands. Waters of the State or Waters of the U.S. may be permanent or intermittent. Waters of the State may include waters determined to be isolated or otherwise non-jurisdictional by the Army Corps of Engineers. The Environmental Document needs to quantify these impacts. Discuss purpose of project, need for surface water disturbance, and alternatives (avoidance, minimize disturbances and mitigation). Mitigation must be identified in the environmental document including timing of construction.

Mitigation must replace functions and values of wetlands lost. For more information see the Lahontan Region Basin Plan http://www.waterboards.ca.gov/lahontan/BPlan/BPlan_Index.htm.

[X] Other

- Please include both pre-construction and post construction stormwater management and best management practices as part of planning process.

- Please consider designs that minimize impervious surface, such as permeable surface parking areas, directing runoff onto vegetated areas using curb cuts and rock swales, etc., and infiltrating runoff as close to the source as possible to avoid forming erosion channels. Design features should be incorporated to ensure that runoff is not concentrated by the proposed project. The project must incorporate measures to ensure that stormwater generated by the project is managed on-site both pre-and post construction. Please show on plan drawings the on-site stormwater control measures.

- If the proposed project is located in an area that contains drainages, wetlands, surface Waters of the State, Waters of the U.S. or blue-line streams, we request that measures be incorporated into the project to avoid such features and provide buffer zones where possible. Please inform project proponent to consult with Army Corps of Engineers, Department of Fish and Game, and the Water Board prior to issuing a grading permit.

- Please consider development features that span the drainage channels or allow for broad crossings. Design features of future development should be incorporated to ensure that runoff is not concentrated by the proposed project, thereby causing downstream erosion.

- Project may impact and alter drainages. We request that the project designs maintain existing drainage features and patterns to the extent feasible. Please inform project proponent to consult with Army Corps of Engineers, Department of Fish and Game, and the Water Board prior to issuing a grading permit.

Projects that propose a Septic Tank Disposal System

- Discharge of any material other than domestic wastewater to an on-site septic tank wastewater disposal system is prohibited unless a Report of Waste Discharge is filed with the Regional Board.

- The proposal does not provide enough information to determine the type of wastewater disposal system that will be used (i.e. septic system, sewer, etc.).

- The proposed project appears to exceed or does not provide enough information regarding the Regional Board's 500 gallon per acre per day limitation on the discharge to septic tank disposal systems.

- If the proposed project is located in an area where septic tank disposal systems are prohibited unless an exemption is requested and granted by the Regional Board. If the project proponent intends to request an exemption, the environmental document must contain the information necessary to make the findings for an exemption (please review the exemption criteria contained in the Water Quality Control Plan for the Lahontan Region (Basin Plan) accessible on the Regional Board's homepage (http://www.waterboards.ca.gov/lahontan/).

- The proposed project may result in discharge of waste that may need to be regulated by the Regional Board. Please review the general permits and the Water Quality Control Plan for the Lahontan Region (Basin Plan) accessible on the Regional Board's homepage (http://www.waterboards.ca.gov/lahontan/).

- We request the project be re-circulated for review and comment should the domestic wastewater disposal system method change.

Please note that obtaining a permit and conducting monitoring does not constitute adequate mitigation. Development and implementation of acceptable mitigation is required.

If you have any questions, please contact me at (760) 241-7376, or e-mail me at mhakakian@waterboards.ca.gov

Sincerely,

Mack Hakakian

Mack Hakakian, PG
Engineering Geologist

MH/rc/CEQA comments/Victorville Hybrid Power Project