# 3.9 HYDROLOGY AND WATER QUALITY

This section evaluates the potential impacts to hydrology and water quality that could result from construction and operation of the Potrero Logistics Center Warehouse Project (Project). The setting, context, and impact analysis in this section is based on the Project Specific Preliminary Water Quality Management Plan (Project-WQMP) as revised April 21, 2021 and Preliminary Hydrology Calculations revised October 13, 2021, completed by Thienes Engineering. These reports are included as ***Appendix M*** to this EIR. More specifically, this section uses this information to describe the existing hydrological conditions and considers relevant goals, policies, and regulations of local, regional, State, and Federal agencies to evaluate and address potential hydrology and water quality impacts that may result from Project implementation. Based on potential environmental impacts, this section discusses and recommends water quality protection measures, to reduce or avoid adverse impacts anticipated from implementation of the Project.

## 3.9.1 ENVIRONMENTAL SETTING

### REGIONAL SETTING

The Project is located in the Santa Ana River Watershed (SARWS). According to the Water Education Foundation (WEF), the SARWS encompasses much of southern California and is the largest watershed drainage from the southern Sierra Nevada range. The watershed is located in a highly urbanized setting and flows for approximately 100 miles. There are more than 50 tributaries through the approximate 2,840 square miles area. The watershed has area in three counties including San Bernardino, Riverside, and Orange. The watershed is divided into the upper and lower areas, with the area east of Prado Dam considered the upper watershed and areas below the dam to the west are parts of the lower watershed (WEF, 2020).

### PROJECT SETTING

The Project Site is currently undeveloped with low lying rolling hills and relatively gentle topography. In general, runoff is via sheet flow to the west and to the south but there are two natural drainages courses that conveys some flows westerly through the site. Within the site the peak 100-year peak flow rate was measured at three locations. The drainage that conveys flows through the southwesterly portion of the site and which receives flows from the majority of the site has a 100-year peak flow rate of approximate 41.5 cubic feet per second (cfs). The northwesterly drainage currently drains a smaller portion of the site has a 100-year peak flow rate of approximately 5.7 cfs. At the boundary of the Project Site flows continue southerly drainage away from the site at approximately 6.9 cfs for the 100-year peak flood flow (Thienes Engineering, 2020)

### SURROUNDING ENVIRONMENT

Surface water currently flows from off-site upstream areas to and through the Project Site. This includes an existing natural drainage course north of the proposed 4$^{th}$ Street alignment. The drainage is currently routed through an existing box culvert that is present beneath the recently graded embankment fill along the east property line near Potrero Boulevard. As part of Project construction, the path of the drainage

would be rerouted and undergrounded from the culvert and around the proposed building area to the proposed outflow on the westerly side of the Warehouse Site. It should be noted that this drainage flows onto the Project Site from an existing culvert under the future alignment of Potrero Boulevard. Based on Caltrans plans and project that was completed separately, the drainage is culverted by a 60-inch pipe that outfalls near the easterly Project Site boundary.

Because it is not feasible to maintain the same drainage path as currently exists through the Warehouse Site, the flows from the drainage are proposed to be conveyed using an underground conveyance system. The conveyance would be installed underground and around the perimeter of the Warehouse structure. The underground conveyance has been designed to accommodate 230 cfs flows. This system would be sized to conduct the flows that are currently entering the undeveloped Project Site from under Potrero Boulevard. The conveyance would conduct the water under the site before release to downstream receiving waters at the outflow west of the western Warehouse Site boundary.

## FLOOD HAZARDS

Federal Emergency Management Agency (FEMA) Flood Insurance Rated Map (FIRM) shows the Project Site is covered by panel [06065C0795H (effective 8/18/2014)]. Based on a review of this panel, the Project Site is not located in floodplain or floodway.

## GROUNDWATER

### Beaumont Basin

The Beaumont Basin is located in the San Gorgonio Pass, which is a low-relief highland that is bordered on the north by the San Bernardino Mountains, on the southeast by the San Jacinto Mountains, and on the west by the San Timoteo Badlands. The Beaumont Basin covers approximately 19.5 square miles and is bounded on the north by the Banning and Cherry Valley faults, on the south and east by the San Timoteo Canyon Fault, and the west by the Banning and Central Banning faults. According to mapping prepared by the City of Beaumont Water Master, the Project is located approximately 0.5 mile south of the adjudicated boundary of Beaumont Water Basin but is mapped as a part of the larger area encompassed by the Beaumont Basin. Within the larger context of groundwater basins, the Beaumont Basin is within the Beaumont Hydrologic Subarea of the San Timoteo Hydrologic Area, which is within the northern portion of the much larger Santa Ana River Hydrologic Unit.

Groundwater levels within the Beaumont Basin are generally lower than groundwater levels in the surrounding areas. Along the Banning Fault, groundwater levels on the north side of the fault and outside the basin are as much as 400 feet higher than groundwater levels on the south side of the fault and inside the Beaumont basin. The same condition has been observed along the southern Beaumont Basin boundary. The overall groundwater levels; however, remained relatively stable during the calendar year of 2017 and rose as much as 15 feet in the northerly areas. This, however, was accompanied by a reduction of approximately 10 feet in the southerly areas. The rise in the northerly portion is partially attributed to the use of the groundwater recharge spreading grounds in the northern portion of the basin.

## WATER QUALITY

The amount of pollutants in surface runoff is determined by the quantity of a material in the environment, that materials' characteristics, and how much of that material(s) gets washed away. In an urban environment, the quantity of certain pollutants in the stormwater systems is generally associated with the intensity and type of land use. Waters flow from the Project Site would drain to downstream receiving waters including San Timoteo Creek, the Santa Ana River, the Prado Basin Management Zone, and ultimately the Pacific Ocean. San Timoteo Creek is noted on the approved U.S. Environmental Protection Agency (U.S. EPA) 303(d) list for indicator bacteria, and portions of the Santa Ana River are listed for indicator bacteria, nitrates, pathogens, copper, and lead. Much further downstream, approximately 60 miles away, flows from these upstream waters would enter the tidal prism of the Santa Ana River and Newport Slough which are listed for Enerococcus, fecal coliform, and total coliform.

To help reduce potential effects to water quality from the Project, a Water Quality Management Plan (WQMP) was developed for the Project to comply with the required permitting process. This process includes conformance to the National Pollution Discharge Elimination System (NPDES), and development of a Stormwater Pollution Prevention Plan (SWPPP) and associated best management practices (BMPs). In addition, the Project is required to comply with the City of Beaumont and associated Regional Municipal Separate Stormwater Sewer System (MS4) Permit adopted by the Santa Ana Regional Water Quality Control Board (RWQCB). These elements of the Project are discussed in additional detail further below.

# 3.9.2 REGULATORY SETTING

## FEDERAL

### Federal Clean Water Act

Because construction of the Project would impact the drainage feature, the Project would be subject to federal permit requirements under the Federal Clean Water Act (CWA). The primary goals of the CWA are to maintain the chemical, physical, and biological integrity of the nation's waters and to make all surface waters fishable and swimmable. The CWA forms the basic national framework for the management of water quality and the control of pollution discharges; it provides the legal framework for several water quality regulations, including the NPDES, effluent limitations, water quality standards, pretreatment standards, antidegradation policy, nonpoint-source discharge programs, and wetlands protection. The U.S. EPA has delegated the administrative responsibility for portions of the CWA to State and regional agencies. In California, the State Water Resources Control Board (SWRCB) administers the NPDES permitting program and is responsible for developing NPDES permitting requirements. The SWRCB works in coordination with the RWQCBs to preserve, protect, enhance, and restore water quality.

Under the NPDES permit program, the U.S. EPA establishes regulations for discharging stormwater by municipal and industrial facilities and construction activities. Section 402 of the CWA prohibits the discharge of pollutants to "Waters of the United States" from any point source unless the discharge is in compliance with an NPDES Permit.

The Anti-degradation Policy under U.S. EPA's Water Quality Standards Regulations (48 F.R. 51400, 40 Code of Federal Regulations [CFR] 131.12, November 8, 1983), requires states and tribes to establish a three-tiered anti-degradation program to prevent a decrease in water quality standards.

- Tier 1—Maintains and protects existing uses and water quality conditions that support such uses. Tier 1 is applicable to all surface waters.
- Tier 2—Maintains and protects "high quality" waters where existing conditions are better than necessary to support "fishable/swimmable" waters. Water quality can be lowered in such waters but not to the point at which it would interfere with existing or designed uses.
- Tier 3—Maintains and protects water quality in outstanding national resource waters (ONRWs). Water quality cannot be lowered in such waters except for certain temporary changes.

Anti-degradation was explicitly incorporated into the Federal CWA through 1987 amendments, codified in § 303(d)(4)(B), requiring satisfaction of anti-degradation requirements before making certain changes in NPDES permits.

Section 303(d) of the CWA requires the SWRCB to list impaired water bodies that are too polluted or otherwise degraded to meet the water quality standards set by states, territories, or authorized tribes. The law requires that these jurisdictions establish priority rankings for waters on the lists and develop Total Maximum Daily Loads (TMDL) for these waters.

The San Timoteo Creek Reach 3 extends from Yucaipa Creek approximately 2.3 miles to the east westerly to the headwaters located at Live Oak Canyon Road approximately 15 miles to the west. This reach of stream is on the TMDL for indicator bacteria. The listing was based on a sufficient number of exceedances of the E. coli Geomean. No other pollutants present in the water warranted a 303d listing (SWRCB, 2016).

Section 404 of the CWA is administered and enforced by the U.S. Army Corps of Engineers (USACE). Section 404 establishes a program to regulate the discharge of dredged and fill material into waters of the United States, including wetlands and coastal areas below the mean high tide. The USACE administers the day-to-day program, and reviews and considers individual permit decisions and jurisdictional determinations. The USACE also develops policy and guidance and enforces Section 404 provisions.

## STATE

### California Porter-Cologne Water Quality Control Act (Porter-Cologne Act)

The Porter-Cologne Act (California Water Code § 13000 et seq) is the principal law governing water quality regulation in California. It established a comprehensive program to protect water quality and the beneficial uses of water. The Porter-Cologne Act applies to surface waters, wetlands, and ground water and to both point and nonpoint sources of pollution. Pursuant to the Porter-Cologne Act the policy of the State is as follows:

- That the quality of all the waters of the State shall be protected,
- That all activities and factors affecting the quality of water shall be regulated to attain the highest water quality within reason, and

- That the State must be prepared to exercise its full power and jurisdiction to protect the quality of water in the State from degradation.

The Porter-Cologne Act established nine RWQCB's (based on hydrogeologic barriers) and the SWRCB, which are charged with implementing its provisions and which have primary responsibility for protecting water quality in California. The SWRCB provides program guidance and oversight, allocates funds, and reviews RWQCB decisions. In addition, the SWRCB allocates rights to the use of surface water. The RWQCBs have primary responsibility for individual permitting, inspection, and enforcement actions within each of nine hydrology regions. The SWRCB and RWQCBs have numerous nonpoint source pollution (NPS)-related responsibilities, including monitoring and assessment, planning, financial assistance, and management.

The RWQCBs regulate discharges under the Porter-Cologne Act primarily through issuance of NPDES permits for point source discharges and waste discharge requirements (WDRs) for NPS discharges. Anyone discharging or proposing to discharge materials that could affect water quality (other than to a community sanitary sewer system regulated by an NPDES permit) must file a report of waste discharge. The SWRCB and the RWQCBs can make their own investigations or may require dischargers to carry out water quality investigations and report on water quality issues. The Porter-Cologne Act provides several options for enforcing WDRs and other orders, including cease and desist orders, cleanup and abatement orders, administrative civil liability orders, civil court actions, and criminal prosecutions.

The Porter-Cologne Act also implements many provisions of the CWA, such as the NPDES permitting program. Section 401 of the CWA gives the SWRCB the authority to review any proposed federally permitted or federally licensed activity that may impact water quality and to certify, condition, or deny the activity if it does not comply with State water quality standards. If the SWRCB imposes a condition on its certification, those conditions must be included in the federal permit or license. Except for dredge and fill activities, injection wells, and solid waste disposal sites, waste discharge requirements may not "specify the design, location, type of construction, or particular manner in which compliance may be had…." (Porter Cologne Act § 13360). Thus, waste discharge requirements ordinarily specify the allowable discharge concentration or load or the resulting condition of the receiving water, rather than the manner by which those results are to be achieved. However, the RWQCBs may impose discharge prohibitions and other limitations on the volume, characteristics, area, or timing of discharges and can set discharge limits such that the only practical way to comply is to use management practices. RWQCBs can also waive waste discharge requirements for a specific discharge or category of discharges on the condition that management measures identified in a water quality management plan approved by the SWRCB or RWQCBs are followed.

The Porter-Cologne Act also requires adoption of water quality control plans that contain the guiding policies of water pollution management in California. A number of statewide water quality control plans have been adopted by the SWRCB. In addition, regional water quality control plans (basin plans) have been adopted by each of the RWQCBs and are updated as necessary and practical. These plans identify the existing and potential beneficial uses of waters of the State and establish water quality objectives to protect these uses. The basin plans also contain implementation, surveillance, and monitoring plans. Statewide and regional water quality control plans include enforceable prohibitions against certain types

of discharges, including those that may pertain to nonpoint sources. Portions of water quality control plans, the water quality objectives and beneficial use designations, are subject to review by U.S. EPA. When approved they become water quality standards under the CWA.

## State Water Resources Control Board

### *National Pollution Discharge Elimination System*

The SWRCB administers water rights, water pollution control, and water quality functions throughout the State, while the RWQCBs conduct planning, permitting, and enforcement activities. The City of Beaumont and unincorporated Project area is within the jurisdiction of the Santa Ana RWQCB.

The NPDES permit is divided into two Phases: Phase I and Phase II. Phase I requires medium and large cities, or certain counties with populations of 100,000 or more to obtain NPDES permit coverage for their stormwater discharges. Phase II requires regulated small MS4s in urbanized areas, as well as small MS4s outside the urbanized areas that are designated by the permitting authority, to obtain NPDES permit coverage for their stormwater discharges. Concerning the Project, the NPDES permit is divided into two parts: construction and post-construction. The construction permitting is administered by the SWRCB, while the post-construction permitting is administered by the RWQCB. Development projects typically result in the disturbance of soil that requires compliance with the NPDES General Permit, Waste Discharge Requirements for Discharges of Stormwater Runoff Associated with Construction Activities (Order No. 2012-0006-DWQ, NPDES Number CAS000002) (General Construction Permit). This Statewide General Construction Permit regulates discharges from construction sites that disturb one or more acres of soil.

The SWRCB has issued and periodically renews a statewide General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (GCASP) and a statewide General Industrial Activities Stormwater Permit (GIASP) for projects that do not require an individual permit for these activities. The GCASP was adopted in 2009 and further revised in 2012 (Order No. 2012-0006-DWQ). The most recent GIASP (Order No. 2014-0057-DWQ) was adopted in April 2014 and requires dischargers to develop and implement a SWPPP to reduce or prevent industrial pollutants in stormwater discharges, eliminate unauthorized non-storm discharges, and conduct visual and analytical stormwater discharge monitoring to verify the effectiveness of the SWPPP and submit an annual report.

By law, all stormwater discharges associated with construction activity where clearing, grading, and excavation results in soil disturbance of at least one acre of total land area must comply with the provisions of this NPDES Permit and develop and implement an effective SWPPP. The SWPPP is required to contain a site map(s), which shows the construction site perimeter, existing and proposed buildings, lots, roadways, stormwater collection and discharge points, general topography both before and after construction, and drainage patterns across the Warehouse Site. The SWPPP is required to list BMPs the discharger will use to protect stormwater runoff and the placement of those BMPs. Additionally, the SWPPP must contain a visual monitoring program; a chemical monitoring program for "non-visible" pollutants to be implemented if there is a failure of BMPs; and, a sediment monitoring plan if the site discharges directly to a water body listed on the 303(d) list for sediment. Construction General Permit Section A describes the elements that must be contained in an SWPPP. A project applicant must submit a Notice of Intent (NOI) to the SWRCB to be covered by the NPDES General Permit and prepare the SWPPP

before beginning construction. SWPPP implementation starts with the commencement of construction and continues through project completion. Upon project completion, the applicant must submit a Notice of Termination (NOT) to the SWRCB to indicate that construction is completed.

For industrial uses, the NPDES program requires certain industrial land uses to prepare a SWPPP for operational activities and to implement a long-term water quality sampling and monitoring program unless an exemption has been granted. This SWPPP requirement for industrial uses began on April 1, 2014 when the SWRCB adopted an updated new NPDES permit for storm water discharge associated with industrial activities (referred to as the "Industrial General Permit") (SWRCB, 2014b). The new Industrial General Permit, which is more stringent than the former Industrial General Permit, became effective on July 1, 2015. Under the NPDES Industrial General Permit currently in effect, industrial uses including but not limited to manufacturing, transportation facilities, and other uses with typically heavy industrial uses would require permitting. These facilities are subject to stormwater effluent limitations. While warehousing uses are not specifically included if a covered use is implemented, the Project could require NPDES coverage under this order (2014-0057-DWQ).

### *Municipal Stormwater Permitting Program*

The Municipal Stormwater Permitting Program regulates stormwater discharges from municipal separate storm sewer (drain) systems (MS4s). Most of these permits are issued to a group of co-permittees encompassing an entire metropolitan area. The MS4 permits require the discharger to develop and implement a Stormwater Management Plan/Program with the goal of reducing the discharge of pollutants to the maximum extent practicable (MEP). MEP is the performance standard specified in CWA § 402(p). The management programs specify what BMPs will be used to address certain program areas. The program areas include public education and outreach; illicit discharge detection and elimination; construction and post-construction; and good housekeeping for municipal operations.

For construction activities that would result in the disturbance of one acre or more, permittees must develop, implement, and enforce a program to reduce pollutant runoff in stormwater. This includes: (1) a program to prevent illicit stormwater discharges; (2) structural and non-structural BMPs to reduce pollutants in runoff from construction sites; and (3) preventing discharges from causing or contributing to violations of water quality standards. Permittees are required to review construction site plans to determine potential water quality impacts and ensure proposed controls are adequate. These include preparation and submission of an Erosion and Sediment Control Plan (ESCP) with elements of an SWPPP, prior to issuance of building or grading permits. The 2012 MS4 permit requires that the ESCP be developed by a Qualified SWPPP Developer. Permittees are required to develop a list of BMPs for a range of construction activities.

## LOCAL

### Riverside County

The Project is located within the larger Santa Ana Watershed which encompasses much of northern Riverside County and drains to the Santa Ana River. On January 29, 2010, the Santa Ana RWQCB issued a fourth-term area wide NPDES MS4 Permit to the Riverside County Flood Control and Water Conservation

District (RCFCWCD) the County of Riverside and the cities of Beaumont, Calimesa, Canyon Lake, Corona, Hemet, Lake Elsinore, Moreno Valley, Menifee, Norco, Perris, Riverside, San Jacinto and Wildomar (Permittees). Watersheds are based on geography and do not follow jurisdictional boundaries and as a result these agencies are working together to improve water quality through implementation of water quality protection measures (RCFCD, 2020).

Accordingly, these efforts led to development of a Water Quality Management Plan (County WQMP) that was approved in October of 2012. The County WQMP was intended to be a guidance document to assist RCFCWCD which is considered the Principal Permittee, and co-permittees including the City of Beaumont to design water quality protection projects and measures in compliance with Santa Ana RWQCB for Priority Development Projects. These requirements are specified in the NPDES MS4 permit, discussed above and issued to the RCFCWCD, and other cities within the Santa Ana River watershed in the 2010 MS4 Permit.

The Santa Ana MS4 Permit is for the portion of the Santa Ana River watershed located within Riverside County (Order No. R8-2010-0033, NPDES Permit No. CAS618033). The Permittees' stormwater programs are designed to ensure compliance with this permit. In addition, the County WQMP is intended to protect, preserve, enhance, and restore water quality of receiving water bodies, which would be accomplished through an adaptive planning and management process. The process identifies high priority water quality conditions within the watershed and implements strategies to address them. The County WQMP also includes typical measures and design and design recommendation that are required for all projects. Accordingly, the co-permittees, including the City of Beaumont work cooperatively to implement the requirements of the permitting process.

## City of Beaumont

The City of Beaumont recognizes that storm water pollution prevention is critical to maintaining good water quality and recognizes its responsibility to maintain compliance with local, state, and federal laws and regulations. The City enforces storm water regulations to reduce and/or eliminate pollutants from urban runoff before entering the storm drainage systems and being discharged to downstream receiving waters. To effectively address this issue, the City adopted the U.S. EPA's NPDES regulations to reduce pollutants in urban runoff and in storm water. As part of the NPDES regulations, the City of Beaumont was issued a MS4 Permit. This State Permit places pollution prevention requirements on planned developments, construction sites, commercial and industrial businesses, municipal facilities and activities, and residential communities.

### *City of Beaumont General Plan*

#### *Conservation and Open Space Element*

The Conservation and Open Space Element establishes goals and policies to protect, maintain, and enhance natural resources in the City. This Element complies with the State requirements for a Conservation Element and an Open Space Element. The Project's consistency with these goals and policies is discussed in ***Table 3.10-3: Beaumont General Plan Consistency Analysis*** of this EIR. The following goals and policies are applicable to hydrology and water quality:

**Goal 8.7** **A City where open space is preserved and used for resource conservation and/or recreation.**

Policy 8.7.5 Preserve watercourses and washes necessary for regional flood control, ground water recharge areas, and drainage for open space and recreational purposes.

**Goal 8.8** **Goal 8.8: A City where the natural and visual character of the community is preserved.**

Policy 8.8.1 Promote the maintenance of open space through the implementation of the General Plan.

Policy 8.8.2 Protect and preserve open space and natural habitat wherever possible.

### *City of Beaumont Municipal Code*

The City of Beaumont Municipal Code consists of all the regulatory and penal ordinances of the City. Among other things, the Municipal Code sets forth requirements for development and operation of City services and conditions placed on the operation of businesses and requirements thereof. The Municipal Code establishes certain requirements related to environmental protections including those pertaining to hydrology and water quality. These are summarized below.

#### *Chapter 13.24.040 Regulatory Consistency*

This chapter shall be construed to assure consistency with the requirements of the CWA, the Porter-Cologne Water Quality Control Act and acts amending or supplementary thereto, applicable implementing regulations and any existing or future municipal NPDES permits and any amendments or revisions thereto or reissuance thereof.

#### *Chapter 13.24.050 Reduction of Pollutants in stormwater*

This chapter relates to reducing pollutants including chemicals and other materials such as trash and debris from entering and drain, inlet, or catch basin. This includes potential pollutants originating from construction sites, new development or redevelopment, or existing development by incorporating BMPs as approved by the City Engineer.

#### *Chapter 13.24.080 – Discharges in Violation of permit*

This chapter relates to municipal and industrial/commercial and construction activity NPDES permit violations and requires that all permitting conditions shall be complied with and implemented as part of a project as prescribed by the permit.

## 3.9.3 STANDARDS OF SIGNIFICANCE

State CEQA Guidelines Appendix G contains the Environmental Checklist Form, which includes questions concerning hydrology and water quality. The questions presented in the Environmental Checklist Form have been utilized as significance criteria in this section. Accordingly, the Project would have a significant effect on the environment if it would:

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality;

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin;

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

   i. Result in substantial erosion or siltation on- or off-site?

   ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

   iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted run-off?

   iv. Impede or redirect flood flows?

d) In flood hazard, tsunami, or seiche zones, risk release or pollutants due to project inundation?

e) Conflict with or obstruct implementation of a water quality control plan or sustainable ground water management plan?

## METHODOLOGY AND ASSUMPTIONS

The Project and associated Project Design Features (PDFs) are evaluated against the aforementioned significance criteria/thresholds, as the basis for determining the impact's level of significance concerning hydrology and water quality. The analysis considers Project design and conformance to the existing regulatory framework (i.e., laws, ordinances, regulations, and standards) required to avoid or reduce the potentially significant environmental impact. Where significant impacts remain despite compliance with the regulatory framework, feasible mitigation measures are recommended, to avoid or reduce the Project's potentially significant environmental impacts.

### Approach to Analysis

A Project Specific Preliminary Water Quality Management Plan based on Preliminary Hydrology Calculations was prepared by Thienes Engineering, as revised August 2020.

## 3.9.4 PROJECT IMPACTS AND MITIGATION

**Impact 3.9-1: Would the Project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?**

***Level of Significance: Less than Significant Impact***

## CONSTRUCTION

Grading activities during construction of would occur after the Project is approved and all required permitting has been obtained. Construction activities associated with clearing and grading would result in the baring and exposure of soils making them more susceptible to erosion than under the current

conditions. Construction activities and operation of heavy equipment would require the storage of fuels, lubricants, and solid and liquid wastes within the Warehouse Site. If the construction areas are not properly managed to contain both bare and loose soils as well as liquid and solid contaminants, temporary water quality impacts could occur if runoff from the Warehouse Site contains any of these materials.

Pursuant to the requirements of the Santa Ana RWQCB and Beaumont Municipal Code, the applicant would be required to obtain coverage under the State's General Construction Storm Water Permit for construction activities (NPDES permit) on the Warehouse Site. The NPDES permit is required for all development projects that include construction activities, such as clearing, grading, and/or excavation, that disturb at least one acre of total land area. In addition, the applicant would be required to comply with the Santa Ana RWQCB's Santa Ana River Basin Water Quality Control Program. Compliance with the NPDES permit and the Santa Ana River Basin Water Quality Control Program involves the preparation and implementation of a SWPPP for construction-related activities. The SWPPP would specify BMPs that all construction contractors would be required to implement during construction activities. BMPs may include but not be limited to, sandbag barriers, silt fences, soil stabilizers, reseeding, straw mats, and other ground covers. This would ensure that potential pollutants of concern are prevented, minimized, and/or otherwise appropriately treated prior to being discharged from the subject property. This is consistent with Chapter 13.24.050 of the City Municipal Code, which requires the reduction of pollutants in stormwater runoff both generally and in conjunction with construction sites, and new development and redevelopment. Conformance with these requirements and measures would ensure that erosion during construction is reduced to less than significant.

## OPERATIONS

Operation of the Project has the potential to result in the contribution of pollutants to include but not limited to bacterial indicators, metals, nutrients, pesticides, and sediments (particularly for non-native landscaped areas), toxic organic compounds (petroleum hydrocarbons and solvents), and trash and debris and oil and grease. These, and other substances, could be washed from the Warehouse Site to the storm drainage system if not properly controlled. To reduce the potential effects of these pollutants, the Project would implement water quality protection measures consistent with the City MS4 requirements. The MS4 would detail post-construction water quality measures to minimize the volume of pollutants, including pollutants of concern, from entering downstream receiving waters. This would be done in part using long term LIDs and BMPs implemented as part of the Project and these structural as well as source control BMPs would be sufficient to reduce impacts. These controls would consist of measures including bioretention areas, installation of water-efficient landscape irrigation systems, storm drain system stenciling and signage, and use of dedicated and marked trash and waste storage areas. These measures would minimize and/or prevent polluted stormwater runoff flows from being discharged into the City's storm drain system and are discussed in additional detail below.

### Project BMPs

The Project would include both permanent and operational source control BMPs. The BMPs for the Project were selected based on the sources of pollutants and based on the proposed uses and the flows from the areas where they would be generated. The listed BMPs would be implemented as part of the Project as a

condition of approval for development of the site. The Project would implement the following BMPs summarized from the WQMP to minimize the introduction of pollutants to the storm drainage system.

On-site Storm Drain inlets – The drain inlets would be marked with text such as, "Only Rain Down the Storm Drain," and that would be maintained regularly. Owners and lessees would be provided with stormwater pollution prevention information and the lease agreement would states, "Tenant shall not allow anyone to discharge anything to storm drain or to store or deposit materials so as to create a potential discharge to storm drains."

Interior Flood Drains and Sumps- All floor drains and elevator shaft sumps would be plumbed to the sanitary sewer and inspected regularly to prevent blockages or overflow.

Landscaping and Pesticide Use – Drought tolerant plants and those conditioned for the local climate would be used and landscaping will be designed to minimize runoff and maximize infiltration. Landscaping requiring minimal pesticides, and those consistent with Riverside guidelines and integrated pest management strategies (IPM) would be used.

Refuse Areas – Refuse areas would be emptied on a minimum weekly basis, and adequate refuse bins would be provided indoors and outdoors to accommodate waste disposal. Bins would be required to be inspected for leaks, to remain covered, and marked with, "No hazardous materials." All spills would be required to be cleaned immediately.

Industrial Processes – All processes would be conducted indoors and will not drain to the stormwater system.

Loading Docks – Any spills at the loading docks will be cleaned immediately and all products will be off-loaded or loaded to covered areas immediately.

Plazas, sidewalks and parking lots – These areas will be swept monthly to prevent accumulation of litter and debris and collected debris will be prevented from entering the storm drain system. All washwater containing any cleaning agent or degreaser and will be collected and discharged to the sanitary sewer.

## Extended Detention Basins and LIDs

The Project WQMP identified principal constraints that could limit the use of low impact development (LID) BMPs including., impermeable soils, pollution, steep slopes, etc. The WQMP considers the existing conditions of the Project Site and provides a selection of LIDs and BMPs to be implemented during operation of the Project. The LIDs and BMPs would reduce impervious surfaces and incorporate landscape and other design measures to enhance water infiltration and treatment prior to release to downstream receiving waters. Conformance with all applicable permitting and incorporation of these measures would reduce impacts from construction to water quality to less than significant. No mitigation is required.

In addition to the LID BMPs, the Project includes two proposed extended detention basins (EBDs) located on the northerly and southerly portion of the Warehouse Site to help manage drainage flows as well as treat runoff. Based on nearby data, a layer of clayey soils is expected to extend 45 feet below ground

surface. Therefore, BMPS that focus on infiltration are not proposed, although some infiltration would still occur. The EDBs would be designed to detain the anticipated volume of stormwater and while maximizing opportunities for volume reduction through infiltration, the basins would use evaporation, evapotranspiration, and surface wetting to minimize off-site flows and reduce volumes of polluted runoff. Additional pollutant removal would be provided through settlement of sediment which allows pollutants to attach to sediment accumulated in the basin which can be later removed and kept from entering downstream areas.

Stormwater would enter the EDB through a forebay where trash, debris, and sediment would accumulate for later removal. Flows from the forebay would enter the vegetated portion of the basin(s). Vegetation would consist of native grasses that enhance infiltration and evapotranspiration. Other areas would be interspersed with gravel-filled trenches that help maximize infiltration potential. Water that does not infiltrate or that is transpired by plants would be conveyed to the bottom stage of the basin. This runoff would be treated using a sand filter and collected in a subdrain structure. Some water entering the basin would be detailed for an extended period by using a more restrictive outlet structure. This would extend the drawdown time within the basin maximizing the time for particles and associated pollutants to settle out. This would reduce the volume of pollutants from exiting the basin, while maximizing opportunities for additional incidental volume losses.

Functionality of the EDBs and LIDs would be maintained through routine upkeep. The EDBs would also undergo yearly maintenance and a five-year maintenance routine. The five-year maintenance of the EDB would include removal of the top three inches of sand from media filter and replacement to the original level. More routine maintenance for the water quality measures would include vegetation control with limited pesticides and herbicide use and application chemical controls focused on low flow areas and outside of the rainy season. Chemical application in the EDBs would only be applied to areas such that they would not affect the media filter(s). Maintenance also would include removal of trash and debris, inspection and repairs of inlets and outlets, checks for erosion, inspection of EDB media and the filtration drains, and removal of clogging and sediment, and repair to damage to the LIDs and BMPs throughout the Warehouse Site.

## Industrial NPDES requirements

Specifically related to industrial uses, the NPDES program requires certain industrial land uses to prepare a SWPPP for operational activities and to implement a long-term water quality sampling and monitoring program, unless an exemption has been granted. On April 1, 2014, the SWRCB adopted an updated new NPDES permit for storm water discharge associated with industrial activities (referred to as the "Industrial General Permit") (SWRCB, 2014b). The new Industrial General Permit, which is more stringent than the former Industrial General Permit, became effective on July 1, 2015. Under this currently effective NPDES Industrial General Permit, the industrial uses such as but not limited to manufacturing, facilities subject to stormwater effluent limitations, transportation facilities, and other uses with typically heavy industrial uses would require permitting. Warehousing uses are not specifically included. Based on the future uses, if a covered use is implemented, the Warehouse Site could require NPDES coverage under this order (2014-0057-DWQ). This would require preparation of a SWPPP for operational activities and implement a long-term water quality sampling and monitoring program or receive an exemption. This permit is

dependent upon a detailed accounting of all operational activities and procedures. Prior to final Project approval a detailed account of the proposed uses within the Warehouse facility would be provided to the City to determine if permitting would be required. If such permitting is required, the mandatory compliance with all applicable water quality regulations would reduce potential water quality impacts during long-term operation.

Conformance with all permitting requirements (NPDES, MS4) and implementation of a SWPPP to include BMPs for both construction and operation, and post construction LIDs through implementation of the Project WQMP would reduce impacts in this regard to less than significant. Therefore, even while Timoteo Creek is listed as an impaired body on the 303d list for indicator bacteria, the Project would not exacerbate this condition. Incorporation of the listed recommendations for construction and post construction controls would ensure impacts associated with violation of a water quality standard or waste discharge leading to substantial degradation or further degradation of surface or groundwater would be less than significant. Thus, additional mitigation beyond the requirements set forth by the federal, State, and local permitting agencies are not required.

***Mitigation Measures***

No mitigation is required.

**Impact 3.9-2: Would the Project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impeded sustainable groundwater management of the basin?**

***Level of Significance: Less than Significant Impact***

## CONSTRUCTION AND OPERATIONS

Water supply to the Project would be provided by the BCVWD. BCVWD service area includes the City of Beaumont and the majority of unincorporated Cherry Valley. The Project would connect to this municipal water system and would not use on-site wells nor would any other groundwater extractive activities occur. The Project would not directly draw water from the Beaumont basin or any other groundwater basin and it would not substantially deplete or decrease groundwater supplies. The Project would not have any direct impact from withdrawal of groundwater supplies in this regard. These impacts would be less than significant.

The City of Beaumont meets potable water demands with imported water supplies purchased through the San Gorgonio Pass Water Agency (SGPWA), Edgar Canyon groundwater, and groundwater stored in the Beaumont Basin. BCVWD's potable water system is supplied by 24 wells in Edgar Canyon and the Beaumont Groundwater Basin and is managed by the Beaumont Basin Watermaster. Groundwater supply is augmented with imported water from the State Water Project (SWP). Imported water is typically used for groundwater recharge at BCVWD's recharge facility at the intersection of Brookside Avenue. and Beaumont Avenue. While the Project would use some water from the groundwater source, the Project was planned for in BCVWD's 2015 UWMP which demonstrated adequate water supplies up to the year 2040.

The Project would be constructed on an existing site that is undeveloped and consists of bare and disturbed soils, a drainage, native habitat as well as upland and ruderal vegetation. While construction of the Project would introduce new impermeable surfaces to the site, the WQMP includes elements to help facilitate infiltration and reduce the effects of the new impervious areas. The WQMP include design measures such as LID and the two extended drainage basins and other stormwater drainage controls. These features would undergo final engineering to ensure runoff is captured and controlled, and allowed to infiltrate or be used by vegetation in the drainage features with a smaller volume requiring release downstream. Although the soil contains higher clay content, the timed-release would allow runoff more time to infiltrate the ground and facilitates recharge. In addition, water that does runoff from the Warehouse Site could enter San Timoteo Creek, which would flow downstream enabling groundwater recharge of downstream basins. Therefore, while the Project would change the groundwater recharge characteristics, with the required measures in place, the loss of the permeable area would not be substantial. Considering these facts, including the substantial efforts undertaken by BCVWD focused on groundwater recharge, the Project would not substantially deplete groundwater supplies and impacts would be less than significant

***Mitigation Measures***

No mitigation is required.

**Impact 3.9-3: Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:**

- **i. Result in substantial erosion or siltation on- or off-site?**
- **ii. Sustainably increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?**
- **iii. Create or contribute runoff water which would exceed the capacity of existing of planned stormwater drainage systems or provide substantial additional sources of polluted runoff?**
- iv. **Impede or redirect flood flows?**

***Level of Significance: Less Than Significant Impact***

## DISCUSSION

Implementation of the Project would alter the existing ground contours of the Warehouse Site. The Warehouse Site is undeveloped, and construction of the warehouse would result in the placement of impervious surfaces where none currently exist. Although a similar overall drainage pattern would be replicated by the Project, the Project would remove the existing drainage course that runs through the Warehouse Site and result in changes to the site's existing internal drainage patterns.

The existing drainage course would be converted to a new underground storm drain that would convey off-site flows under the proposed development and release the water off-site in the existing natural

drainage where the water currently flows. Storm drain improvements also would be installed to collect and treat on-site stormwater flows from the Warehouse Site. On-site runoff would flow into two on-site extended detention basins and once the water has been treated it would be released into the storm drain to convey flows off-site near the southwestern corner of the site. The two drainage systems would prevent "comingling" the on-site and off-site flows and prevent downstream water quality degradation.

Construction of the site also would include the installation of on-site systems that would be integrated to the overall drainage plan. The on-site system would consist of drainage features designed to capture and control stormwater within the Warehouse Site. These measures may include, but would not be limited to, underground storm drainpipes, catch basins, underground infiltration basins, LIDs, and other structural BMPs. These drainage elements would temporarily capture and hold stormwater before conveying the stormwater that did not infiltrate, evaporate, or that was transpired by vegetation to the large drainage system before being conveyed off-site.

The Project would include four drainage management areas (DMAs) to ensure runoff from the various Project elements is properly controlled, given opportunity infiltrate, be used by plants, and settle pollutants prior to being conveyed for release to the downstream receiving waters. The DMAs were development based on the existing site characteristics, existing and proposed surfaces, soil types, and final Project design. ***Table 3.9-1: Drainage Management Area Classifications***, provides information about the DMAs, including the proposed surface type and the area of each DMA in both square feet and acres. Water from the DMAs would flow to LIDs and BMPs that have been specifically designed to provide for adequate treatment and to ensure an adequate Design Capture Volume (DCV) is provided.

Therefore, while the drainage pattern through the site would be altered, the overall drainage patterns and release points and flow regime from the Project site would not be substantially changed such that any of the significance criteria on the following pages would be exceeded.

**Table 3.9-1 – Drainage Management Area Classification**

| Drainage Management Area | Surface Type | Area (sf) | Area (acres) |
|---|---|---|---|
| 1A | Roof/Concrete/Asphalt | 705,772 | Type D |
| 1B | Ornamental Landscaping | 67,518 | 1.55 |
| 2A | Roof/Concrete/Asphalt | 583,704 | 13.4 |
| 2B | Ornamental Landscaping | 63,162 | 1.45 |
| 3 | Ornamental Landscaping | 28,314 | 0.65 |
| 4 | Ornamental Landscaping | 26,136 | 0.6 |

Source: WQMP, 2020
Note: DMA's 3 and 4 are self-treating areas.
DMA's 1A, 1B, 2A, and 2B flow to one of the extended LID BMP, detention basins

**i. Result in substantial erosion or siltation on- or off-site?**

## CONSTRUCTION AND OPERATION

Construction of the Project would alter the existing drainage pattern of the site considering the existing site is generally undeveloped with no impervious surfaces. The Project would be required to conform with

the Sana Ana RWQCB's Santa Ana River Basin Water Quality Control Program. Compliance involves the preparation and approval of a SWPPP prior to initiation of any site disturbance. BMPS would be implemented in accordance with the SWPPP. These measures would reduce, minimize, or eliminate waterborne pollution, erosion, and siltation. BMPs may include but not be limited to, sandbag barriers, silt fences, soil stabilizers, reseeding, straw mats, and other ground covers. Conformance with these requirements and measures would ensure that erosion during construction is reduced to less than significant.

Operationally, the proposed drainage patterns have been designed to mimic the pre-development conditions. The use of impervious surfaces has been minimized to the extent feasible, meet City standards, and would maximize treatment and infiltration through the use of landscaping and the EDBs. Although, it was considered, it was not possible to use landscaping instead of pavement for vehicle movements due to the large truck fleet. However, to the extent practicable, the Project designs incorporate landscaping and other pervious areas. Storm drain improvements would consist of collecting and treating on-site flows prior to conveying them off-site to an existing storm drain system in 4th Street or directly into Coopers Creek.

Rooftop runoff would be conducted to the proposed BMPs and EDBs for treatment and two extended detention basins. Runoff from the southerly portion of the building, the southerly truck yard, and a portion of the easterly vehicle parking lot would drain to the southerly detention basin. The 100-year peak flow rate from these areas is approximately 44.3 cfs. Runoff from the northerly portion of the site and a portion of the easterly vehicle parking would drain northwesterly to the northerly extended detention basin. The 100-year peak flow rate from the site is approximately 36.9 cfs. After capture and release, the flows that do not infiltrate, evaporate, or that are transpired by plants flow westerly off-site into downstream water basins.

As discussed above, the existing drainage course that runs through the Warehouse Site would be converted to a new underground storm drain that would convey off-site flows under the proposed development and release the water off-site in the existing natural drainage where the water currently flows. This would be a closed system and no sedimentation or erosion would occur within the conveyance.

Storm drain improvements for collecting and treating on-site stormwater flows from the Warehouse Site would initially be captured by a series of integrated on-site drainage features designed to capture and control stormwater. These measures may include, but would not be limited to, underground storm drainpipes, catch basins, underground infiltration basins, LIDs, and other structural BMPs. Flows from these facilities would flow to one of two on-site extended detention basins. Once the water has been treated in the extended detention basins, it would be released into the storm drain prior to being released into the existing natural drainage course near the southwestern corner of the site. This design would result in the separation of the existing drainage and proposed stormwater control systems. This system would prevent "comingling" the on-site and off-site flows and prevent downstream water quality degradation.

Thus, while the Project would result in a modification to the on-site drainage and hydrology, the drainage plan has been designed with adequate capacity and treatment measures to ensure there is not a

substantial increase in siltation or erosion, and potential increases to flooding are minimized. Impacts in this regard would be less than significant and mitigation is not required.

***Mitigation Measures***

No mitigation is required

**ii. Sustainably increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?**

## CONSTRUCTION AND OPERATION

As discussed above, both construction and operation of the Project would result in a potential for increased runoff due to the baring of soils and introduction of impervious surfaces. The Project has been designed to control runoff both during and post construction. Grading and construction on the Warehouse Site would generally mimic the waterflow paths and facilitate infiltration, evapotranspiration, or evaporation as compared to the existing site condition. Stormwater flows from the Warehouse Site would continue to trend to the south and west to downstream areas and would not substantially alter the inflow or outflow of the natural flow regime.

The rate and amount of surface runoff versus infiltration on a given site is determined by multiple factors. This includes the volume and intensity of precipitation; amount of other imported water that enters a watershed; surface and subsurface soil layers vegetative cover, existing soils moisture content, slope, etc. While the Project would result in changes from the creation of impervious surfaces, the overall volume and time of concentration of storm water would not be substantially different from the pre-development condition for a two-year return frequency storm. The difference would be less than five percent.

The existing drainage course that runs through the Warehouse Site would maintain the same inflow point from the Caltrans culvert under Potrero Boulevard. and would have a similar outfall flow point near the western boundary of the Warehouse Site. Although the drainage would be altered and flow through an underground system, the flows would not substantially change and would not result in an increased potential for flooding on or off-site.

Similarly, although the on-site flows would be changed, the storm drain improvements for collecting and retaining water would ensure on-site and off-site flooding does not occur. The Project includes a series of integrated on-site drainage features designed to capture and control stormwater. These measures may include, but would not be limited to, underground storm drainpipes, catch basins, underground infiltration basins, LIDs, and other structural BMPs. In addition, the Project includes two on-site extended detention basins that would hold and treat stormwater prior to release downstream. This design separates the existing drainage and proposed stormwater control systems resulting in a system that prevents “comingling” and would ensure flows are maintained through adequate storage and timed release such that flooding does not occur.

Sizing of the extended detention basins was determined based a comparison of the post development conditions to the existing conditions. For the Project, two separate hydrographs were calculated for both the northerly and southerly detention basins. To meet hydrologic conditions of concern (HCOC) and

associated requirements, the required runoff volumes was achieved by using LIDs and hydromodification BMPs. Hydrographs were developed for the northerly and southerly portions of the site based on the 5-year 24-hour, 100-year 1-hour, 3-hour, 6-hour, and 24-hour events and runoff volumes were calculated to determine basin size. The water volume for the Project is approximately 205,926 cu-ft. The EDBs were designed to accommodate this flow and as a result, HCOCs would be addressed by the proposed EDBs. In sum the EDBs would provide the necessary 6.5 ac-feet of water storage.

Therefore, the Project would facilitate an adequate time of concentration on-site and reduce the potential for peak flows to impact off-site areas. Although impervious surfaces would be introduced, the post construction hydrologic conditions would be similar to pre-development conditions as discussed above, water release would be timed to ensure safe release of water. As such, the Project would not contribute to potential flooding on-site or to downstream receiving waters. Impacts would be less than significant.

***Mitigation Measures***

No mitigation is required.

**iii. Create or contribute runoff water which would exceed the capacity of existing of planned stormwater drainage systems or provide substantial additional sources of polluted runoff?**

## CONSTRUCTION AND OPERATION

As discussed in impacts HYD 3.9-3 i, ii, and below, the Project would comply with the requirements of the NPDES permits, which helps control water pollution by regulating point and non-point sources that discharge pollutants into receiving waters through the development of a SWPPP and implementation of BMPs.

The General Construction Permit requires implementation of a SWPPP, which would include previously discussed BMPs designed to minimize effects on storm water runoff. Preparation, implementation, and participation with both the NPDES General Permit and the General Construction Permit, including the SWPPP and BMPs, would reduce the potential for storm water flows to convey pollutants or other sediments off-site during construction of the Project. Conformance with these requirements would be verified prior to any Project approval and included as conditions of approval to any future project. Impacts would be less than significant.

As mandated by the RWQCB and through implementation of the SWQMP, the Project would include new storm water drainage system facilities that would be engineered, designed, and installed to satisfy the all water quality requirements. These measures would operate post construction and would include minimization of impervious surfaces, as feasible, and use of LIDs and BMPs, and the EDBs. All measures would be properly sized and integrated into the Project design to ensure post-development flows are accommodated and do not result in substantial sources of polluted runoff. As discussed above, the existing and proposed stormwater drainage systems would be separated to avoid comingling of flows and to avoid any on-site or downstream water quality impacts. Accordingly, the proposed on-site storm drainage would be addressed through the placement of two extended detention basin that would be fed by an on-site system with LIDs BMPS, and other localized improvements. Storm drain improvements

would consist of collecting and treating on-site flows prior to conveying them off-site and downstream receiving waters.

To ensure that the new storm water drainage improvements are planned and designed to satisfy these requirements as well as all other applicable standards and requirements, they would be verified by the City Engineer and incorporated as conditions of approval to all projects prior to the issuance of any construction permit. Compliance with these requirements would ensure impacts are less than significant and mitigation would not be required.

***Mitigation Measures***

No mitigation is required

**iv. Impede or redirect flood flows?**

## CONSTRUCTION AND OPERATION

FEMA Flood Insurance Rated Map (FIRM) shows the Project Site is covered by panel 06065C0759H (effective 8/18/2014).

Based on a review of this panel, this is an area of minimal flood hazard. More specifically, the Project Site is located within "Zone X," which corresponds to areas with minimal flood hazard outside of the 500-year floodplain (also referred to as the 0.2% annual chance floodplain). Therefore, no portions of the Project Sites are located a 100-year flood hazard area and impacts would be less than significant.

***Mitigation Measures***

No mitigation is required.

**Impact 3.9-4: Is the project in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?**

***Level of Significance: No Impact***

## CONSTRUCTION AND OPERATION

The Project is inland and is not at risk for inundation due to a tsunami. The Project Site is not within a flood hazard are or seiche zone. Therefore, the Project is not at risk for release of pollutants due to Project inundation.

***Mitigation Measures***

No mitigation is required

**Impact 4.10-5: Would the Project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?**

**Level of Significance:** No Impact

## CONSTRUCTION AND OPERATION

As discussed in the Impacts discussions above, the Project Site is located within the Santa Ana River Basin and all construction and operational activities would be required to comply with the Santa Ana RWQCB's Santa Ana River Basin Water Quality Control Plan. This would require preparation and implementation of a SWPPP and applicable BMPs. The Project would be required to show conformance prior to any approval. With the existing proposed design elements and further conformance with NPDES requirements, the Project would not conflict with or obstruct the Santa Ana River Basin Water Quality Control Plan. In addition, the Project would not include drawing water from a well or any other ground water sources. The Project would receive potable water from the BCVWD. Therefore, the Project would not obstruct or prevent implementation of the management plan or sustainable groundwater management plan for any basin and potential impacts are less than significant.

***Mitigation Measures***

No mitigation is required.

### 3.9.5 SIGNIFICANT UNAVOIDABLE IMPACTS

No significant unavoidable hydrology or water quality impacts have been identified.

### 3.9.6 CUMULATIVE IMPACTS

Cumulative impacts to hydrology and water quality could occur as new development, redevelopment, and existing uses are ongoing within the watershed. This includes the Project, and other past, present, and future projects. Because parts of the watershed are already urbanized with suburban uses, growth is anticipated to consist of a mix of redevelopment as well as new development and consistent with past and present growth trends and planned development is anticipated to consist of a mix of uses (residential, commercials, industrial, etc.). New development would result in increases in impervious surfaces, and thus could generate increased runoff from the affected Project Sites. Depending on the characteristics of the other project sites, they would be required to prepare and implement SWPPPs with BMPs to control erosions and stormwater runoff in accordance with all required water quality permits and the Water Quality Control Plan. This would include conformance with the Santa Ana RWQCB's Santa Ana River Basin WQMP. As needed, projects would implement BMPs, including LID BMPs, to minimize runoff, erosion, and storm water pollution. As part of these requirements, projects would be required to implement and maintain source controls, and treatment measures to minimize polluted discharge and prevent increases in runoff flows that could substantially decrease water quality. Conformance to these measures would minimize runoff from those sites and reduce contamination of runoff with pollutants. Therefore, related projects are not expected to cause substantial increases in storm water pollution. With compliance with State and local mandates and implementation on a site by site basis, the impacts from the related projects should be mitigated to less than significant, and as the Project has no significant hydrology or water quality impacts, the cumulative impacts of the Project together with the related projects would not be cumulatively significant.

## 3.9.7 REFERENCES

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