3.14 WATER RESOURCES

3.14.1 Regulatory Setting

3.14.1.1 Federal and State Regulations

Clean Water Act

The federal Clean Water Act (33 USC 1251-1376) (CWA) is the major federal legislation governing water quality. The CWA's objective is "to restore and maintain the chemical, physical, and biological integrity of the Nation's water."

Under Section 303 of the CWA, California is required to establish beneficial uses of state waters and adopt water quality standards to protect those beneficial uses. Section 303(d) establishes the Total Maximum Daily Load (TMDL) process to assist in guiding the application of state water-quality standards. The TMDL is the maximum quantity of a particular water-quality parameter that a water body can assimilate without experiencing adverse effects. To identify candidate water bodies for TMDL analysis, a list of streams with limited water quality is generated. These streams are considered impaired by the presence of certain pollutants to the extent they cannot assimilate additional quantities of the pollutants.

Water Quality Certification

Section 401 of the CWA requires a Water Quality Certification (or waiver) for any activity that may result in discharge of a pollutant. For the Study Area evaluated in this document, Section 401 is implemented by the Los Angeles Regional Water Quality Control Board (RWQCB) and Santa Ana RWQCB.

National Pollutant Discharge Elimination System

Section 402 of the CWA established the National Pollutant Discharge Elimination System (NPDES) permit program to control discharges of pollutants from point-source and nonpoint-source discharges, including stormwater, to waters of the U.S. The U.S. Environmental Protection Agency (EPA) has granted California the predominant role in administering and enforcing the provisions of the CWA and NPDES in the State. These provisions are carried out by the State Water Resources Control Board (SWRCB) and RWQCBs. The SWRCB issues both general and individual NPDES permits.

Dredge and Fill Permits

Section 404 of the CWA obligates the U.S. Army Corps of Engineers (USACE) to issue permits for the movement of dredge and fill materials into and from "waters of the United States." Additionally Section 404 requires permits for activities affecting hydrologically important areas. For example, alterations of wetlands, rivers, or ephemeral creek beds resulting from construction activities require Section 404 permits.

Porter-Cologne Water Quality Control Act of 1969

The Porter-Cologne Water Quality Control Act (Porter-Cologne) established the State Water Resources Control Board (SWRCB) and divided California into nine regional basins, each with its RWQCB. The SWRCB is the primary State agency responsible for protecting the quality of the California's surface and groundwater supplies. The Act authorizes the SWRCB to draft state policies regarding water quality in

accordance with Section 303 of the CWA, and to issue waste discharge requirements for projects that would discharge to State waters. In addition, it requires the SWRCB or the RWQCB to adopt water quality control plans (Basin Plans) for the protection of water quality. A Basin Plan must identify beneficial uses of water to be protected, establish water quality objectives for the reasonable protection of the beneficial uses, and establish an implementation program to achieve the water quality objectives. Basin Plans also provide the technical basis for determining waste discharge requirements, taking enforcement actions, and evaluating clean water grant proposals. Basin Plans are updated and reviewed every three years in accordance with Article 3 of the Porter-Cologne Water Quality Control Act and Section 303(c) of the CWA.

National Flood Insurance Program

Congress responded to increasing costs of disaster relief by passing the National Flood Insurance Act of 1968 and the Flood Disaster Protection Act of 1973. These acts are intended to reduce the need for large, publicly funded flood control structures and disaster relief by restricting development on floodplains. The Federal Emergency Management Agency (FEMA) administers the National Flood Insurance Program to provide subsidized flood insurance to communities that comply with FEMA regulations that limit development in floodplains. FEMA issues Flood Insurance Rate Maps (FIRM) for communities participating in the National Flood Insurance Program. These maps delineate flood hazard zones in the community.

Streambed Alteration Agreement

A Streambed Alteration Agreement (California Department of Fish and Game [CDFG] Code 1600 et. seq.) is required for any work within a creek or stream and its floodplain. Streambed Alteration Agreements may impose conditions to protect water quality during project construction.

3.14.1.2 Regional Regulations

Los Angeles and Santa Ana Regional Water Quality Control Boards Basin Plans

Water quality in channels, drainages, and groundwater supplies within the region that includes the Study Area is regulated by both the Los Angeles RWQCB and the Santa Ana RWQCB. State policy for water quality control is directed at achieving the highest water quality consistent with the maximum benefit to the people of the State. To develop water quality standards consistent with the uses of a water body, the Los Angeles RWQCB and Santa Ana RWQCB attempt to classify historical, present, and future beneficial uses as part of their Basin Plans. An impact on a beneficial use would occur where there is an actual or threatened loss or reduction of that beneficial use.

Water Quality Objectives

Water quality objectives are established in the Los Angeles RWQCB and Santa Ana RWQCB Basin Plans in support of beneficial uses. Water quality objectives pertain to chemicals, sediments, color, tastes, odor, radioactivity, and floatables in surface waters and groundwaters. For many constituents, water quality objectives vary, based on the designated beneficial use of the specific water body.

Water Quality Certification

The SWRCB, through the RWQCBs, is responsible for water quality certification in California. For an RWQCB to issue a water quality certification, it must determine that the activity would not violate water

quality objectives, that beneficial uses are protected, and that the activity meets the requirements of the State's anti-degradation policy. Water quality certification must address the impacts on water quality resulting from the activity as a whole, including operation of the project, and not merely impacts resulting from the discharge An RWQCB may also impose water quality conditions, including in-stream flow specifications, requiring the applicant to operate the project consistently with designated beneficial uses or as necessary to implement the State's anti-degradation policy.

National Pollutant Discharge Elimination System Permits

Construction activities resulting in one acre or more of total ground disturbance are required to obtain coverage under the NPDES General Permit for Discharges of Stormwater Associated with Construction Activity (Construction General Permit Order 2009-009-DWQ). To obtain coverage, a Notice of Intent (NOI) must be filed with the RWQCB, which administers and enforces the general permit. As part of this process, a stormwater pollution prevention plan (SWPPP) must be prepared. The SWPPP includes pollution prevention measures (erosion and sediment control measures and measures to control non-stormwater discharges and hazardous spills), demonstration of compliance with all applicable local and regional erosion and sediment control standards, identification of responsible parties, a detailed construction timeline, and best management practices (BMPs) monitoring and maintenance schedule. A Notice of Termination must be filed with the RWQCB when construction is completed. Discharges of construction dewatering wastewater to surface waters are governed by the RWQCB's general waste discharge requirements. A discharger must apply to the board for approval to discharge. The permit consist of limits on the amount of certain substances that may be discharged, including oil and grease, sulfides, residual chlorine, suspended solids, and petroleum hydrocarbons, and requires monitoring to ensure that the terms of the permit are met.

Best Management Practices

The use of BMPs is required during construction and operation of a project to protect water quality. In 1993, the California Stormwater Quality Task Force (now the California Stormwater Quality Association) introduced the California Stormwater Best Management Practice Handbook. This handbook includes stormwater-related BMPs for construction and operation.

BMPs for construction include:

- Installing check dams and filter berms to protect drainage ways.
- Placing chemical stabilizers, mulch, seed, or sod over exposed soils.
- Using geotextiles and gradient terraces to protect slopes.
- Using silt fences and temporary diversion dikes to protect construction area perimeters.
- Using on-site dust control (watering, covering areas prone to wind dispersion with plastic, etc.).
- Stabilizing construction area entrances (using aggregate or vehicle rinse mechanisms to minimize the amount of soil on roadways from construction-related trucks).
- Adhering to the appropriate county measures guiding/governing the use of fertilizers, pesticides, and soil amendments.

BMPs for operation include:

- Using absorbent materials for spills.
- Substituting non-toxic chemicals for toxic chemicals wherever possible.
- Using clarifiers and designated wash areas.
- Ensuring proper handling of potential contaminants.
- Inspecting and cleaning catch basin/drainage periodically.
- Stenciling catch basins/drainages "No dumping. Drains to ocean." or equivalent.
- Utilizing an efficient irrigation system that minimizes runoff.
- Adhering to the appropriate county measures guiding/governing the use of fertilizers and pesticides.

3.14.1.3 Local Regulations

The Cities of Glendora, San Dimas, La Verne, Pomona, Claremont, and Montclair include regulations for surface runoff of contaminants and protection of structures in their municipal codes. These regulations include requirements for NPDES permits and implementation of BMPs, which are similar to the regional BMPs, to protect water quality during construction and operation activities.

3.14.2 Existing Conditions

3.14.2.1 Regional Setting

Climate

The Study Area is within the Los Angeles region where the climate is Mediterranean, with dry, warm summers and wet, mild winters. The Pacific Ocean influences precipitation, which is normally negligible from spring to late October, but begins to increase during November as the storm track (Jet Stream) from the Pacific Ocean begins to shift toward Southern California. Most of the region's approximately 15-inch annual average rainfall occurs between November and March.

Topography

The Study Area is located along the southern foothills of the San Gabriel Mountains. Slopes in this area tend to become milder to the east. Topography includes southwest and southeast trending slopes, which range from very mild slopes (an approximate 40 feet to every 0.5-mile) to areas that are nearly flat. Table 3.14-1 summarizes topographic characteristics of each city within the Study Area.

Table 3.14-1. Generalized Study Area Topography

City	Slope Declination	Grade
Glendora	SW	Very Mild
San Dimas	SW	Nearly Flat
La Verne	S-SW	Nearly Flat
Pomona	SW	Nearly Flat
Claremont	SW	Nearly Flat
Montclair	SW	Nearly Flat

Source: USGS 7.5-Minute Quad Maps of Glendora and San Dimas, California.

Surface Hydrology

Surface hydrology considerations include sediment and contaminant input into local water bodies from runoff. Sediment and contaminant source locations in urban areas include parking lots, streets, rooftops, landscaped areas, and exposed earth at construction sites. Typical contaminants in urban runoff include hydrocarbons, metals, pesticides, bacteria, nutrients, and trash. Typical construction site-related contaminants include fuels, hydraulic fluid, coolant, solvents, paints, etc. Construction-site sediment runoff results from unprotected areas of exposed soil. The Study Area is located within an area that is developed primarily with urban uses—residential, commercial, and industrial.

Study Area Drainages

The channels and drainages in the Study Area drain either into the San Gabriel River or Santa Ana River. The channels and their characteristics are summarized in Table 3.14-2. These channels and drainages are classified on U.S. Geological Survey (USGS) 7.5-minute quadrangle maps as blue line streams; blue line streams are characterized by year-round water flow. There are no channels or drainages designated as blue line streams within the Claremont portion of the Study Area.

Table 3.14-2. Channels and Drainages in the Study Area

City	Channel/Drainage	Description			
		Concrete Lined	Concrete Sides, Natural Bottom	Under-ground	Bridged
Glendora	Little Dalton Wash	●	N/A	●	N/A
	Big Dalton Wash	●	N/A	N/A	●
	East Branch Wash	●	N/A	●	N/A
	San Dimas Wash	●	N/A	N/A	●
San Dimas	Unnamed Wash at Amelia Avenue	—	—	●	N/A
	Walnut Creek	●	N/A	●	N/A
La Verne	Live Oak Wash	●	N/A	N/A	●
	Marshall Creek	●	N/A	●	N/A
	Puddingstone Channel	●	N/A	●	N/A
Pomona	Thompson Creek	●	N/A	N/A	●
Montclair	San Antonio Creek Channel	●	N/A	N/A	●

Sources:
1. Los Angeles County Department of Public Works, Hydrologic Report, 2009-2010.
2. Los Angeles County GIS Data for Rivers, Streams, Water Conveyance (Pipelines and Aqueducts), 2011 http://egis3.lacounty.gov/dataportal/?p=1972 accessed on 06/13/2011.
3. Observations made during site reconnaissance conducted on 10/31/2003, 11/03/2003, and on 06/15/2011, Parsons Brinckerhoff.

Notes:
1. Exposed or Underground applies to the portion of the channel or drainage underlying the rail right-of-way.
2. N/A indicates "not applicable."
3. — indicates "no data."
4. Bridged denotes that the rails cross over the channel or drainage on a structure.

Beneficial Uses of Surface Waters

When discussing channels, drainages, and groundwater basins (see Groundwater Hydrology section below) the Los Angeles RWQCB and Santa Ana RWQCB assign beneficial use designations to each

water body. Table 3.14-3 shows the beneficial use designations for the channels and drainages in the Study Area. These designations include:

- **Agricultural Supply (AGR)—**Waters used for farming, horticulture, or ranching, including irrigation, stock watering, or support of vegetation for range grazing.
- **Cold Freshwater Habitat (COLD)—**Waters that support coldwater ecosystems that may include preservation and enhancement of aquatic habitats, vegetation, fish, and wildlife, including invertebrates.
- **Fresh Water Replenishment (FRSH)—**Waters used for natural or artificial maintenance of surface water quantity or quality (i.e., salinity).
- **Groundwater Recharge (GWR)—**Waters used for natural or artificial recharge of groundwater for purposes of future extraction, maintenance of water quality, or halting saltwater intrusion into freshwater aquifers.
- **Industrial Service Supply (IND)—**Waters used for industrial activities, including mining, cooling water supply, hydraulic conveyance, gravel washing, fire protection, and oil well re-pressurization.
- **Municipal and Domestic Supply (MUN)—**Waters used for community, military or individual water supply systems, including drinking water supply.
- **Hydropower Generation (POW)—**Waters used for hydroelectric power generation.
- **Industrial Process Supply (PROC)—**Waters used for industrial activities and processes.
- **Rare, Threatened, or Endangered Species (RARE)—**Waters that support habitats necessary for the survival and successful maintenance of plant or animal species designated under state or federal law as rare, threatened, or endangered.
- **Water Contact Recreation (REC-1)—**Waters used for recreational activities involving body contact with water, where ingestion of water is reasonably possible. These activities include swimming, wading, water-skiing, skin and scuba diving, surfing, white-water activities, fishing, and use of natural hot springs.
- **Non-Contact Water Recreation (REC-2)—**Waters used for recreational activities in proximity to water, but not normally involving body contact with water, where ingestion of water is reasonably possible. These include picnicking, sunbathing, hiking, beachcombing, camping, boating, tidepool and marine life study, hunting, sightseeing, or aesthetic enjoyment included with these activities.
- **Warm Freshwater Habitat (WARM)—**Waters that support warm water ecosystems, including preservation or enhancement of aquatic habitats, vegetation, fish, or wildlife, including invertebrates.
- **Wetland Habitat (WET)—**Waters that support wetlands ecosystems, including preservation or enhancement of wetland habitats, vegetation, fish, shellfish, or wildlife, and other unique wetland functions that enhance water quality, such as providing flood and erosion control, stream bank stabilization, and filtration and purification of naturally occurring contaminants.
- **Wildlife Habitat (WILD)—**Waters that support terrestrial ecosystems, including preservation and enhancement of terrestrial habitats, vegetation, wildlife (mammals, birds, reptiles, amphibians, and invertebrates), or wildlife water and food sources. This designation does not mean the use by the special status species.

Table 3.14-3. Beneficial Uses of Study Area Channels and Drainages

City	Watershed	Channel or Drainage	Beneficial Use													
			AGR	COLD	FRSH	GWR	IND	MUN	POW	PROC	RARE	REC-1	REC-2	WARM	WET	WILD
Glendora	SGR	Little Dalton Wash	—	—	—	I	—	P	—	—	—	P	I	P	—	P
	SGR	Big Dalton Wash	—	—	—	I	—	P	—	—	—	P	I	P	—	P
	SGR	East Branch Wash	—	—	—	—	—	—	—	—	—	—	—	—	—	—
	SGR	San Dimas Wash	—	—	—	I	—	P	—	—	E	I	I	I	—	E
San Dimas	SGR	Unnamed wash at Amelia Ave.	—	—	—	—	—	—	—	—	—	—	—	—	—	—
	SGR	Walnut Creek	I	—	—	—	—	P	—	—	—	I	I	I	E	E
La Verne	SGR	Live Oak Wash	—	—	I	I	—	E	—	—	—	I	I	I	—	E
	SGR	Marshall Creek	—	—	—	I	—	E	—	—	—	I	I	I	E	E
	SGR	Puddingstone Channel	—	—	—	I	—	E	—	—	—	I	I	I	—	E
Pomona	SGR	Thompson Creek	—	—	—	I	—	P	—	—	—	I	I	I	—	E
Montclair	SAR	San Antonio Creek Channel	P/E	P/E	—	P/E	P/E	P/E	P/E	P/E	—	P/E	P/E	—	—	P/E

Sources:
1. Los Angeles Regional Water Quality Control Board, Water Quality Control Plan, Los Angeles Region, February 23, 1995.
2. Santa Ana Regional Water Quality Control Board, Water Quality Control Plan, Santa Ana River Basin, updated February 2008.
Abbreviations:
P—Potential Beneficial Use
I—Intermittent Beneficial Use
E—Existing Beneficial Use
—: Not designated
SGR—San Gabriel River Watershed
SAR—Upper Santa Ana River Watershed. In this watershed there is no differentiation between existing or potential beneficial uses and they are shown as both.

Impaired Surface Water Bodies

In addition to listing beneficial uses for each water body, the SWRCB prepares a list of impaired water bodies. According to a listing of impaired water bodies in the 2006 CWA, Section 303(d), List of Water Quality Limited Segment, the Puddingstone Reservoir and Walnut Creek both have impairments.

The Puddingstone Reservoir is the terminus of the Puddingstone Channel, Marshall Creek, Live Oak Wash, and Walnut Creek. With the exception of Live Oak Wash, these channels or drainages are located underground of the project right-of-way. The Puddingstone Reservoir is listed as impaired for chlordane, DDT, mercury, organic enrichment, low dissolved oxygen, and PCBs. Walnut Creek is listed as impaired for pH and toxicity.

Groundwater Hydrology

Groundwater is found in subsurface water-bearing formations. The elevation of groundwater varies with the amount of withdrawal and the amount of recharge. Groundwater basins may be recharged naturally through filtrating precipitation, or artificially with imported or reclaimed water. The Study Area, from west to east, traverses the Glendora, Way Hill, San Dimas, Pomona, and Chino Sub-Basins of the Upper Santa Ana Valley groundwater basins. Table 3.14-4 summarizes characteristics of these basins.

Glendora Groundwater Basin

The portion of the Study Area from approximately Barranca Avenue in Glendora to the approximate location of the intersection of Alosta Avenue (Route 66) and the existing rail alignment in Glendora lies atop the Glendora Groundwater Basin. The depth to groundwater in this basin near the proposed Glendora Station is approximately 260 feet below grade.

Way Hill Groundwater Basin

The portion of the Study Area from the approximate location of the intersection of Alosta Avenue (Route 66) and the existing rail alignment in Glendora to the approximate location of the I-210 over-crossing of the rail alignment in San Dimas lies atop the Way Hill Groundwater Basin. The average depth to groundwater in this basin near the existing rail alignment is approximately 100 feet below grade.

San Dimas Groundwater Basin

The portion of the Study Area from the approximate location of the I-210 over-crossing of the Metro Rail in San Dimas to the approximate location of the Puddingstone Channel over-crossing of the Metro Rail in La Verne lies atop the San Dimas Groundwater Basin. The depth to groundwater in this basin near the proposed San Dimas Station is approximately 350 feet below grade.

Pomona Groundwater Basin

The portion of the Study Area from the approximate location of the Puddingstone Channel over-crossing of the Metro Rail in La Verne to the approximate location of the Metro Rail crossing at Indian Hill Boulevard in Claremont lies atop of the Pomona Groundwater Basin. The depths to groundwater in this basin near the proposed La Verne and Pomona Stations are approximately 440 and 480 feet below grade, respectively. The westerly portion of the Pomona Groundwater Basin contains high levels of nitrates. A plume of volatile organic compounds (VOCs) is present in the southern portion of the basin. Pomona has VOC treatment/removal facilities in the Pomona Groundwater Basin.[1]

[1] *Final Groundwater Assessment Study* (Report Number 1308), Metropolitan Water District of Southern California, September 2007. http://www.mwdh2o.com/mwdh2o/pages/yourwater/supply/groundwater/GWAS.html

Table 3.14-4. Study Area Groundwater Basins

City	Underlying Groundwater Basin	Maintained By	Approximate Depth to Groundwater (in feet)	Beneficial Uses			
				AGR	IND	MUN	PROC
Glendora	Glendora	San Gabriel Basin Watermaster	260	E	E	E	E
	Way Hill		100	E	E	E	E
San Dimas							
	San Dimas		350	E	E	E	E
La Verne							
	Pomona	Six Basins Watermaster	440—480 traveling west to east	E	E	E	E
Pomona							
Claremont							
	Chino Sub-Basin of Upper Santa Ana Valley	Chino Basin Watermaster	510—600 traveling west to east	E	E	E	E
Montclair							

Sources:

1. Basin Locations: Los Angeles County Department of Public Works, Hydrologic Report, 2009-2010 and Los Angeles County GIS Data for Groundwater Basins, 2005 http://egis3.lacounty.gov/dataportal/?p=1201 accessed on 06/06/2011. Basin Locations: Los Angeles County Department of Public Works, Hydrologic Report, 2009-2010 and Los Angeles County GIS Data for Groundwater Basins, 2005 http://egis3.lacounty.gov/dataportal/?p=1201 accessed on 06/06/2011.
2. Depth to Groundwater in Glendora, Way Hill and San Dimas Basins: From comparison between grade-level elevations of USGS 7.5-Minute Quad Maps of Glendora and San Dimas, California.
3. Depth to Groundwater in Pomona and Chino Sub-Basins: From comparison between grade-level elevations of USGS 7.5-Minute Quad Maps of San Dimas, California and *Optimum Basin Management Program: Chino Basin Watermaster, Figure 2.5 Management Zones and Fall 1997 Groundwater Elevation Contours*, August 1999, Wildermuth Environmental, Inc.
4. Beneficial Uses: *Water Quality Control Plan, Los Angeles Region*, February 1995 and *Water Quality Control Plan, Santa Ana Region*, updated February 2008.

Notes:

1. Some cities overlay more than one basin
2. E: Indicates Existing Beneficial Use

Chino Sub-Basin of the Upper Santa Ana Valley Groundwater Basin

The portion of the Study Area from the approximate location of the Metro Rail crossing at Indian Hill Boulevard in Claremont to the east end of the Study Area lies atop the Chino Sub-Basin of the Upper Santa Valley Ana Groundwater Basin. The depths to groundwater in this basin near the proposed Claremont and Montclair Stations are approximately 510 and 600 feet below grade, respectively.

Floodplains and Flooding

The Federal FEMA administers the National Flood Insurance Program to provide subsidized flood insurance to communities that comply with FEMA regulations that limit development in floodplains. The 100-year flood was adopted as the national standard by the Federal Insurance Administration for floodplain management and insurance purposes.

FEMA issues Flood Insurance Rate Maps (FIRM) for communities participating in the National Flood Insurance Program. These maps delineate flood hazard zones in the community. According to FIRMs, no mapped areas within the Study Area are located within a100-year flood zone.

3.14.3 Environmental Impacts

3.14.3.1 Evaluation Methodology

The evaluation of impacts on water resources included reviews of available hydrology sources and databases as well as site reconnaissance visits. The impacts are evaluated qualitatively based on standard professional practice. Construction activities with the potential to have an impact on water quality include:

- Soil-disturbing activities (e.g., excavation and grading), which can lead to erosion and sedimentation.
- Use of construction-related hazardous materials, which could result in spills that would impact surface waters.
- Excavation in areas of high groundwater, which could result in impacts to groundwater quality or quantity from dewatering activities and direct exposure of groundwater to sediment and other contaminants.
- Construction within a designated flood zone, which could pose a risk to workers.

Operational impacts to water resources could result from either ongoing activities of the railroad or the physical impact of project facilities on the landscape, including stations, traction power supply substations (TPSSs), and parking areas. For the project, actions that could lead to an impact include:

- Increases in impervious surfaces as a result of the project, leading to changes in the timing and volume of water runoff.
- Changes or interruptions in the local drainage infrastructure as a result of project design, potentially leading to localized or regional drainage impacts (e.g., flooding).
- Creation of significant new sources of pollutants, such as from parking lots and maintenance facilities, leading to new sources of contaminated runoff.
- Location of project facilities below the naturally occurring water table, with potential impacts related to flooding and changes in groundwater quality and/or quantity.
- Location of project facilities within a designated floodplain, exposing the project to risks related to flooding, as well as subjecting other areas to impacts resulting from changes in the location and or direction of flood flows.
- Location of project facilities within areas subject to inundation by seiches (standing waves), tsunami, or mudflow, resulting in potential damage to such facilities.

For each area of impact, the level of impact was compared against the significance criteria provided below.

3.14.3.2 Impact Criteria

Impact on water resources is considered to be significant impact if the project would:

- Violate any water quality standards or waste discharge requirements;
- Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted);

- Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site;
- Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;
- Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff;
- Otherwise substantially degrade water quality;
- Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or FIRM or other flood hazard delineation map;
- Place within a 100-year flood hazard area structures which would impede or redirect flood flows;
- Expose people or structures to a significant risk or loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam;
- Place within an area vulnerable to inundation by seiches (standing waves), tsunamis or mudflows;
- Require or result in the construction of new water treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects;
- Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects; and/or
- Require new or expanded entitlements of water supplies to serve the project.

3.14.3.3 Short-term Construction Impacts

No Build Alternative

The No Build Alternative does not include projects or physical improvements within the Study Area. Therefore, no construction-related impacts to surface waters, groundwater, or flood-related impacts would occur under this alternative.

Transportation Systems Management Alternative

The Transportation Systems Management (TSM) Alternative would include low-cost improvements to reduce delay and enhance mobility by increasing the frequency of existing bus service. This alternative would emphasize transportation system upgrades such as intersection improvements, minor road widening, traffic engineering actions, bus route restructuring, shortened bus headways, expanded use of articulated buses, reserved bus lanes, expanded park-and-ride facilities, express and limited-stop service, signalization improvements, and timed-transfer operations.

Implementation of these improvements is not expected to include major construction. Therefore, no significant water quality impacts to surface waters or groundwater are anticipated to occur. Also, no flood-related impacts are anticipated to occur under this alternative.

Build Alternative

The construction-related impacts from the Build Alternative would be temporary and primarily be to surface water, specifically in the areas of channels or drainages. Construction would be implemented in compliance with all applicable regulations and requirements, including implementation of BMPs throughout the construction period in accordance with a Standard Urban Stormwater Mitigation Plan (SUSMP), which would be prepared during final design. Construction would also require permits from regulatory agencies—including the USACE, CDFG, Los Angeles RWQCB, and Santa Ana RWQCB—which would specify the exact combination of design features, construction techniques, and BMPs that would be implemented. The BMPs may include installing check dams and filter berms to protect drainage ways: placing chemical stabilizers:, mulch, seed, or sod over exposed soils; using geotextiles and gradient terraces to protect slopes; using silt fences and temporary diversion dikes to protect construction area perimeters; using on-site dust control (watering, covering areas prone to wind dispersion with plastic, etc.); stabilizing construction area entrances (using aggregate or vehicle rinse mechanisms to minimize the amount of soil on roadways from construction-related trucks), and others.

The project would necessitate the use of water during construction for dust control, vehicle maintenance and washing, and other uses. However, the use of water would be short-term and minimal, and in compliance with existing regulations BMPs will be implemented to prevent surface and groundwater quality impacts.

Compliance with local, state, and federal regulations and requirements by establishing project controls through formalized processes, agreements, and permits would eliminate or reduce water quality impacts to a level that is less than significant.

The regulatory compliance would include the following:

- Prior to construction, coordinating with USACE, CDFG, Los Angeles RWQCB, Santa Ana RWQCB and other agencies as appropriate to determine the requirements for each agency permits for any blue line streams, as well as potential culverts and/or storm drains affected by project construction.
- Obtaining an NPDES Construction General Permit from both the Los Angeles RWQCB and Santa Ana RWQCB. This includes filing an NOI with both RWQCBs prior to construction, and preparing a Storm Water Pollution Prevention Plan (SWPPP) that
  - Requires implementation of BMPs to prevent a net increase in sediment load in stormwater discharges relative to the preconstruction levels:
  - Prohibits discharges of stormwater or non-stormwater at levels which would cause or contribute to an exceedance of any applicable water quality standard contained in the relevant Basin Plans.
  - Discusses in detail the BMPs to be used for project-related control of sediment and erosion, non-sediment pollutants, and potential pollutants in non-stormwater discharges.
  - Describes post-construction BMPs for the project.
  - Explains the monitoring and maintenance program for the project's BMPs.
  - Requires reporting violations to the Los Angeles RWQCB and Santa Ana RWQCB.
  - Lists the parties responsible for SWPPP implementation and BMP maintenance both during and after construction. Upon acceptance of the NOIs by the Los Angeles RWQCB and Santa Ana RWQCB, the project proponent shall implement the SWPPP, and modify the SWPPP as directed by the Los Angeles RWQCB and Santa Ana RWQCB.

- Requires preparation of a SUSMP during final design and implementation of the SUSMP.
- Developing a Water Quality Management Plan (WQMP) and submitting WQMP for review to each respective City within the Study Area. The Cities would act on WQMP prior to the issuance of precise grading permits for project facility development. The WQMP will describe the routine and special post-construction BMPs to be used, including both structural and non-structural measures; describe responsibility for initial implementation and long-term maintenance of the BMPs; and identify the locations of the structural BMPs. Also, in compliance with existing regulations, should the project contribute to off-site drainage deficiencies, participation on a fair-share basis in the construction of improvements necessary (as determined by the Cities affected by the project) to address these deficiencies would occur.

No construction-related impacts to groundwater are anticipated from construction of the rail line, stations, and support facilities. This is because no excavation would be conducted below groundwater tables, no dewatering would occur, and the implementation of BMPs in compliance with existing regulations would minimize and prevent contaminants from entering groundwater. Groundwater-related BMPs would include, at a minimum, installing check dams and filter berms to protect drainage ways, and adhering to Los Angeles County and San Bernardino County standards and regulations regarding the use of fertilizers, pesticides, and soil amendments.

No construction-related impacts associated with flooding are anticipated within the Study Area because the Study Area is not located within any mapped 100-year flood zone.

Glendora

Rail-Related Surface Water Impacts. Project-related construction affecting Glendora would include relocation of the existing rail, addition of two adjacent rails, construction of three TPSSs, and activities related to the proposed Glendora Station and parking structure. Relocating and adding rails within the existing right-of-way would necessitate modifications to the right-of-way and rail bed grades, such as adding fill and rail bed. The existing rail bed varies between being even or above adjacent right-of-way topography. Additionally, the right-of-way would need widening in some areas. Therefore, some filling to widen the right-of-way and add the adjacent rails would be required. With regulatory compliance, including implementation of construction-related BMPs, it is anticipated that the rail relocations and additions would result in less-than-significant water quality impacts to surface waters.

Channel/Drainage Surface Water Impacts. There are four channels or drainages (Little Dalton Wash, Big Dalton Wash, East Branch Wash, and San Dimas Wash) that are designated as blue line streams, as well as culverts and storm drains within the Glendora portion of the Study Area. The Little Dalton Wash and the East Branch Wash are underground in the existing right-of-way, and the Big Dalton Wash and the San Dimas Wash are bridged in the right-of-way.

The relocation and addition of tracks atop of the Little Dalton and East Branch washes would not have the potential to generate sedimentation or contamination within the streams below because the openings of the channels or drainages are located far out of the rail right-of-way. Thus, it is anticipated that no water quality impacts to surface waters would occur.

The relocation and addition of tracks atop the Big Dalton and San Dimas washes would require extension of the bridge structure and a new bridge, respectively. Improvements to existing culverts and storm drains would also be required and could include extension, widening, replacement, and/or relocation. In so doing, there is a potential for construction-related pollutants (paints, fuels, hydraulic fluids, etc.), debris,

and sediment to be discharged into surface waters and storm drains. However, these activities would proceed in strict compliance with existing regulations described previously, including implementation of construction BMPs, which would reduce the likelihood of such discharges to occur. Also, the requirement for contractors to utilize only well-maintained equipment would further reduce the likelihood of occurrence. Therefore, only minor and temporary water quality impacts to surface waters would occur. With regulatory compliance and BMPs, water quality impacts to surface waters would be reduced to a less-than-significant level.

Station Surface Water Impacts. The Glendora Station would include development of a two-level parking structure in an existing unpaved area south of the existing station. A portion of the "Option 1" parking structure would be below grade. No portions of the "Option 2" parking structures would be below grade. The Glendora Station would also require the development of a platform. Construction activity related to the parking structure, station platform, and TPSSs would require some site grading. However, it is anticipated that ground disturbance would be minimal. Construction in these areas would proceed in compliance with existing regulations and would include implementation of construction BMPs. Within this compliance, construction of the parking structure, station platform, and TPSSs would be temporary and would result in a less-than-significant water quality impact to surface waters.

Groundwater Impacts. Although a portion of the Glendora Station parking structure would be below grade, no excavation below groundwater level would be required, and no construction dewatering would occur. Groundwater-related BMPs would also be implemented in compliance with existing regulations to minimize and prevent contaminants from entering groundwater. Thus, no impacts to groundwater are likely to occur.

Flood-Related Impacts. The Study Area is not located within a FEMA 100-year floodplain. Thus, no construction-related flood hazard impacts are anticipated.

San Dimas

Rail-Related Surface Water Impacts. Project-related construction affecting San Dimas would include relocation of the existing rail, addition of two adjacent rails, widening the right-of-way, construction of two TPSSs, and activities related to the San Dimas Station and parking structure. Relocating and adding rails within the existing right-of-way would necessitate modifications to the right-of-way and rail bed grades, such as adding fill and rail bed. The existing rail bed varies between being even or above adjacent right-of-way topography. Additionally, the right-of-way would need widening in some areas. Hence, some filling to widen the right-of-way and add the adjacent rails would be required. With compliance with existing regulations including implementation of construction-related BMPs, it is anticipated that the rail relocations and additions would result in less-than-significant water quality impacts to surface waters.

Channel/Drainage Surface Water Impacts. There are two channels or drainages (an unnamed wash at Amelia Avenue and Walnut Creek) designated as blue line streams, as well as culverts and storm drains within the San Dimas portion of the Study Area. The unnamed wash at Amelia Avenue is assumed to be underground. Although it is shown on the San Dimas, California, 7.5-minute quad sheet (photo-revised 1981), it is not evident on current aerial photographs and was not observed during field reconnaissance conducted in 2003. The relocation and addition of tracks above this wash would likely have no or minimal construction-related water quality impacts; it is unobserved in the right-of-way. Thus, it is anticipated that no water quality impacts to surface waters would occur.

Walnut Creek is bridged in the right-of-way. The relocation and addition of tracks atop Walnut Creek would require replacing the existing culvert with a new culvert. Improvements to another existing culvert or storm drains would also be required and could include extension, widening, replacement, or relocation. In so doing, there is a potential for construction-related pollutants (paints, fuels, hydraulic fluids, etc.), debris, and sediment to be discharged into the creek and storm drains, which in turn could affect the water quality of the creek and receiving waters.

Construction of culvert improvements would proceed in strict compliance with existing regulations, including implementation of construction BMPs which would reduce the likelihood of such discharge to occur, and the requirement for contractors to utilize only well-maintained equipment would further reduce the likelihood of occurrence. As a result, only minor and temporary water quality impacts to surface waters would occur. With regulatory compliance, including BMPs, water quality impacts to surface waters would be reduced to a less-than-significant level.

Station Surface Water Impacts. Construction at the San Dimas Station would include development of a three-level parking structure on an existing paved area south of the station and development of a new platform. Construction activity related to the parking structure, station platform, and TPSSs along the alignment would require some site grading. It is anticipated that ground disturbance would be minimal. Construction in these areas would proceed in compliance with existing regulations, including implementation of construction BMPs. As a result, the temporary construction activities related to the parking structure, station platform, and TPSSs would result in less-than-significant water quality impacts to surface waters.

Groundwater Impacts. No excavation below groundwater level would be required, and no construction dewatering would occur. Groundwater-related BMPs would be implemented in compliance with existing regulations to minimize and prevent contaminants from entering groundwater. Thus, no impacts to groundwater are likely to occur.

Flood-Related Impacts. The Study Area is not located within a FEMA 100-year floodplain. Thus, no construction-related flood hazard impacts are anticipated.

La Verne

Rail-Related Surface Water Impacts. Project-related construction affecting La Verne would include relocation of the existing rail, addition of two adjacent rails, construction of two TPSSs, and activities related to the La Verne Station and parking structure. Relocating and adding rails to the existing right-of-way would not necessitate significant changes in the existing rail bed or right-of-way. The rail bed is at grade within the right-of-way, and the right-of-way is located in a nearly flat area. Thus, no significant water quality impacts to surface waters are anticipated.

Channel/Drainage Surface Water Impacts. There are three channels or drainages (Puddingstone Channel, Marshall Creek, and Live Oak Creek) designated as blue line streams, as well as culverts and storm drains within the La Verne portion of the Study Area. The Marshall Creek and Puddingstone Channel are mostly underground in the right-of-way. Live Oak Creek is bridged in the right-of-way.

A small portion of the openings of the Puddingstone Channel and Marshall Creek is located within a temporary construction easement area. The relocation and addition of tracks atop Marshall Creek and Live Oak Channel would require new structural protection on the northern end of the tracks and extension of the bridge, respectively. Improvements to existing culverts or storm drains would be required and may

include extension, widening, replacement, or relocation. In so doing, there is a potential for construction-related pollutants (paints, fuels, hydraulic fluids, etc.), debris, and sediment to be discharged into surface waters and storm drains, which in turn could affect the water quality of surface and receiving waters.

However, construction activities would proceed in strict compliance with existing regulations, including implementation of construction BMPs which would reduce the likelihood of such occurrence, and the requirement for contractors to utilize only well-maintained equipment would further reduce the likelihood of occurrence. As a result, only minor and temporary water quality impacts to surface waters would occur. With regulatory compliance and BMPs, water quality impacts to surface waters would be reduced to a less-than-significant level.

Station Surface Water Impacts. Construction at the La Verne Station would include development of a six-level parking structure on an existing paved area southeast of the station and development of a new platform. Construction activity related to the parking structure, station platform, and TPSSs along the alignment would require some site grading, although ground disturbance would be minimal. Project-related construction in these areas would include implementation of construction BMPs in compliance with existing regulation. With this compliance, the parking structure, station platform, and TPSS construction would be temporary and would result in less-than-significant water quality impacts to surface waters,

Groundwater Impacts. No excavation below groundwater level would be required, and no construction dewatering would occur. Groundwater-related BMPs would be implemented to minimize and prevent contaminants from entering groundwater. Thus, no impacts to groundwater are likely to occur.

Flood-Related Impacts. The Study Area is not located within a FEMA 100-year floodplain. Thus, no construction-related flood hazard impacts are anticipated.

Pomona

Rail-Related Surface Water Impacts. Project-related construction affecting Pomona would include relocation of the existing rail, addition of two adjacent rails, construction of a TPSS, and activities related to the Pomona Station and parking structure. Relocating and adding rails to the existing right-of-way would not necessitate significant changes in the rail bed grade or right-of-way. The rail bed is at grade within the right-of-way, and the right-of-way is located in a nearly flat area. Thus, it is likely that no water quality impacts to surface waters would occur.

Channel/Drainage Surface Water Impacts. There is one channel or drainage, Thompson Creek, designated as a blue line stream within the Pomona portion of the Study Area. The right-of-way is bridged over Thompson Creek. The relocation and addition of tracks atop Thompson Creek would require extension of the bridge. In so doing, there is a potential for construction-related pollutants (paints, fuels, hydraulic fluids, etc.), debris, and sediment to be discharged into Thompson Creek, which in turn could affect the water quality of the creek and the receiving waters.

However, construction activities would proceed in strict compliance with existing regulations, including implementation of specific construction BMPs which would reduce the likelihood of this occurring, and the requirement for contractors to utilize only well-maintained equipment would further reduce the likelihood of occurrence. As a result, only minor and temporary water quality impacts to surface waters would occur. With regulatory compliance and BMPs, water quality impacts to surface waters would be reduced to a less-than-significant level.

Station Surface Water Impacts. The Pomona Station would include the development of a four-and-a half-level parking structure in an existing paved area north of the station and development of a new platform. Construction activity related to the parking structure, station platform, and TPSS along the alignment would require some site grading. However, it is anticipated that ground disturbance would be minimal and construction activities would be include implementation of construction BMPs in compliance with existing regulations. With this regulatory compliance, construction of the parking structure, station platform, and TPSS would be temporary and would result in less-than-significant water quality impacts to surface waters.

Groundwater Impacts. No excavation below groundwater level would be required, and no construction dewatering would occur. Groundwater-related BMPs would be implemented to minimize and prevent contaminants from entering groundwater. Thus, no impacts to groundwater are likely to occur.

Flood-Related Impacts. The Study Area is not located within a FEMA 100-year floodplain. Thus, no construction-related flood hazard impacts are anticipated.

Claremont

Rail-Related Surface Water Impacts. Project-related construction affecting Claremont would include relocation of the existing rail, addition of two adjacent rails, construction of two TPSSs, and activities related to the Claremont Station and parking structure. The action of relocating and adding rails to the existing right-of-way would not necessitate significant changes in the existing rail bed grade or right-of-way. The rail bed is at grade within the right-of-way, and the right-of-way is in a nearly flat area. Thus, it is likely that no significant water quality impacts to surface waters would occur.

Channel/Drainage Surface Water Impacts. There are no channels or drainages designated as blue line streams within the Claremont portion of the Study Area; however, there are storm drains and a culvert. With implementation of construction BMPs in compliance with existing regulations, water quality impacts to surface waters would be reduced to a less-than-significant level.

Station Surface Water Impacts. The Claremont Station would include the conversion of the existing Metrolink park-and-ride lot (located on 1st Street east of College Avenue) to a three-level parking structure. The Claremont Station would also require relocation of the existing Claremont Metrolink Station platforms to accommodate new platforms for the project. The Metrolink platforms would be relocated east of College Avenue. Construction related to the parking structure, TPSSs, Claremont Station platforms, and relocation of the Metrolink platforms would require some site grading. However, it is anticipated that ground disturbance would be minimal, and the project construction activities would be in compliance with all applicable existing regulations, including implementation of construction BMPs. With this compliance, construction of the parking structure, TPSSs, Claremont Station platforms, and the relocation of the Metrolink platforms would be temporary and would result in less-than-significant water quality impacts to surface waters.

Groundwater Impacts. No excavation below groundwater level would be required, and no construction dewatering would occur. Groundwater-related BMPs would be implemented in compliance with existing regulations to minimize contaminants and prevent them from entering groundwater. Thus, no impacts to groundwater are likely to occur.

Flood-Related Impacts. The Study Area is not located within a FEMA 100-year floodplain. Thus, no construction-related flood hazard impacts are anticipated.

Montclair

Rail-Related Surface Water Impacts. Project-related construction affecting Montclair would include modifications to the existing Metrolink westbound platform, addition of two adjacent light-rail transit tracks and a center platform, reconfiguration of the stairs, ramps and tunnel that connect the parking lot and bus stops to the Metrolink and project platforms, modifications to the bus transfer facilities, construction of a TPSS, and activities related to the Montclair Station. These modifications to the existing transit center would not necessitate significant changes in the rail bed grade, right-of-way, or adjacent parking and bus transit facilities. The rail bed is at grade, and the right-of-way and adjacent parking and bus facilities are located in a nearly flat area. Thus, it is likely that no significant water quality impacts to surface waters would occur.

Channel/Drainage Surface Water Impacts. There is one channel or drainage (San Antonio Creek) designated as a blue line stream within the Montclair portion of the Study Area; the creek is bridged within the right-of-way. The relocation and addition of tracks atop San Antonio Creek would require extension of the bridge. In so doing, there is a potential for construction-related pollutants (paints, fuels, hydraulic fluids, etc.), debris, and sediment to be discharged into San Antonio Creek, which in turn could affect the water quality of the creek and receiving waters. However, construction activities would proceed in strict compliance with existing regulations, including implementation of specific construction BMPs, which would reduce the likelihood of this occurring, and the requirement for contractors to utilize only well-maintained equipment would further reduce the likelihood of occurrence. As a result, only minor and temporary water quality impacts to surface waters would occur. With regulatory compliance, including BMPs, water quality impacts to surface waters would be reduced to a less-than-significant level.

Station Surface Water Impacts. The Montclair Station is not anticipated to require the development of new parking facilities. However, the Montclair Station would require modifications to the existing Metrolink westbound platform and bus transfer facilities, as well as reconfiguration of the stairs, ramps and tunnel that connect the parking lot and bus stops to the Metrolink and Montclair Station platforms. While construction related to the Montclair Station platforms and TPSS, and modifications to the existing transit center would require some site grading, it is anticipated that ground disturbance would be minimal. Construction in these areas would implement BMPs in compliance with existing regulations. As a result, construction of the Montclair Station platforms and TPSS, and modifications to the existing transit center would be would result in temporary less-than-significant water quality impacts to surface waters.

Groundwater Impacts. No excavation below groundwater level would be required, and no construction dewatering would occur. Groundwater-related BMPs would be implemented to minimize and prevent contaminants from entering groundwater. Thus, no impacts to groundwater are likely to occur.

Flood-Related Impacts. The Study Area is not located within a FEMA 100-year floodplain. Thus, no construction-related flood hazard impacts are anticipated.

3.14.3.4 Long-Term Impacts

No Build Alternative

The No Build Alternative would not include any major physical improvements. Therefore, no long-term impacts to surface waters and groundwater or flood-related impacts would occur.

Transportation Systems Management Alternative

The TSM Alternative represents programmatic changes to existing arterial bus service schedules. As such, no long-term impacts to surface waters or groundwater are anticipated. Additionally, no flood-related impacts are anticipated.

Build Alternative

The project is not located within a 100-year flood zone and would not place any housing or other structures within a 100-year flood zone. In addition, the project is not located downstream of a dam or levee or in an area vulnerable to inundation by seiches, tsunamis, or mudflows.

Surface Water Impacts

The project would introduce new impervious surfaces; however, the extent of new impervious surfaces would be minimal and would not alter the drainage or increase the amount of runoff significantly. Existing drainage patterns would be maintained to the maximum extent practicable. Flow rates and the amount of surface runoff would be managed by extending, widening, replacing, or relocating existing culverts and storm drains and by extending, replacing, or providing structural support for bridges over channels or drainages. Compliance with existing regulations, including the use of construction and post-construction BMPs would ensure that drainage flows are properly treated and conveyed. With this compliance, there would be no operational disruption of existing storm drainage facilities. Thus, it is anticipated that water quality impacts to surface waters would be less than significant.

Potential operational surface water impacts could result from accidental spills or leaks along the rail right-of-way. However, considering the project trains are for the transport of passengers, it is unlikely that significant amounts of contaminants would be aboard and available to be spilled or leaked. The trains would be required to have scheduled maintenance, thus further reducing the potential for spills or leaks that could enter local drainages. The existing freight operations would continue to use their contaminant control measures.

Groundwater Impacts

Long-term impacts to groundwater are not anticipated during operation. The project is not anticipated to deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table. The depths to groundwater throughout the Study Area are at least 100 feet below grade. No excavations will reach that depth, and no dewatering is anticipated. In addition, based on the size of the project footprint and distribution of station facilities and parking structures along the Study Area, it is unlikely that substantial reductions in groundwater recharge would occur.

Post-construction BMPs would be implemented in compliance with existing regulations to ensure the project would not contribute to the impairment of groundwater. Thus, no long-term impacts to groundwater are likely to occur.

3.14.3.5 Cumulative Impacts

The Southern California Association of Governments (SCAG) 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) Final Program EIR provides a regional cumulative impact assessment for transportation improvements (including the project) through 2035. SCAG's analysis of the RTP/SCS concludes that significant cumulative impacts to water quality would result because of the potential of the 2012 RTP to influence future growth that would contribute to the

conversion of undeveloped land to urban uses within the entire six-county SCAG region. However, these impacts would be less than significant because future development in Glendora, San Dimas, La Verne, Pomona, Claremont, and Montclair is guided by local land use plans and zoning regulations and no growth beyond that already provided for in these plans would occur.

3.14.4 Mitigation Measures

3.14.4.1 Short-Term Construction Mitigation Measures

Section 3.14.3.3 identified construction impacts for which compliance with local, state, and federal regulations and requirements would eliminate or reduce impacts by establishing project controls through formalized processes, agreements, and permits. The regulatory compliance would include coordination with regulatory agencies prior to construction, to determine the requirements for each agency permits for any blue line streams, as well as potential culverts and/or storm drains affected by project construction; obtaining an NPDES Construction General Permit from both the Los Angeles RWQCB and Santa Ana RWQCB, which includes a Storm Water Pollution Prevention Plan (SWPPP) that would be implemented throughout construction; preparing and implementing a Standard Urban Stormwater Mitigation Plan (SUSMP); developing a Water Quality Management Plan (WQMP) and submitting WQMP for review to each respective City within the Study Area, which would be acted on by the Cities prior to the issuance of precise grading permits for project facility development. These plans will describe the routine and special post-construction BMPs to be used, including both structural and non-structural measures; describe responsibility for initial implementation and long-term maintenance of the BMPs; and identify the locations of the structural BMPs. Also, in compliance with existing regulations, should the project contribute to off-site drainage deficiencies, participation on a fair-share basis in the construction of improvements necessary (as determined by the cities affected by the project) to address these deficiencies would occur.

Compliance with these regulations and requirements would minimize surface and groundwater quality impacts to less than significant levels, and no additional mitigation is required.

3.14.4.2 Long-Term Mitigation Measures

The project would not require long-term mitigation measures since post-construction BMPs would be implemented in compliance with existing regulations as part of the operational phase.

3.14.5 Level of Impact after Mitigation

The project will be implemented in compliance with all applicable regulatory requirements. Compliance with these regulatory requirements, including compliance with permit requirements and implementation of construction and post-construction BMPs, would reduce impacts to a less than significant level.