

## Comment Set B State Water Resources Control Board

**From:** Jensen, Joanna@Waterboards [mailto:Joanna.Jensen@waterboards.ca.gov]  
**Sent:** Monday, December 15, 2014 7:52 PM  
**To:** Uchida, Jensen  
**Subject:** Comments on the Draft MND/Initial Study for the SCE Banducci Substation Project

Dear Jensen Uchida,

Please accept my comments on behalf of the State Water Resources Control Board (SWRCB) on the Draft Mitigated Negative Declaration (MND)/Initial Study for the Banducci Substation Project (Project), which has been proposed by the Southern California Edison Company (SCE). I anticipate being the lead SWRCB staff working on the 401 certification for the Project (the SWRCB will certify the Project as the Project area is within the jurisdiction of two Regional Water Boards). As such, my comments focus on the potential hydrology and water quality impacts of the project to Waters of the State.

B-1

I note that Figures 5-9-1 and 5-9-2 (mentioned on pages 5-181 and 5-182, respectively) were missing from both the hardcopy MND and the enclosed CD. These figures were supposed to show surface and groundwater features. Also there were no tables within the MND summarizing the affected aquatic resources within the Project area. I strongly recommend that a table be included in the Final MND that lists the following for each affected surface water of the state: water body name/nearest downstream named water body, Basin Name and Hydrologic Code, assigned beneficial uses of the water body, whether perennial or ephemeral, and water body type (wetland, stream, lake, pond etc.). Please also note if any of these receiving waters are CWA Section 303(d) listed for pollutants, and if so, for which pollutants. It would also be very useful to know what the potential impact at each site would be and which APMs would be proposed applied to each affected site.

Currently, the only description of potentially affected surface water resources in the MND in Section 5.9 (Hydrology and Water Quality) consists of one paragraph on page 5-181. There is some mention of riparian areas and wetlands on page 5-79, but as it relates to biology resources. Based on this very sparse information, it is difficult to determine whether potential Project impacts to surface waters are less than significant. Please include some description of the type of potential impacts to surface waters envisioned (culverts? crossings?) and some estimate of the magnitude of associated impacts.

B-2

Checklist item 5.9.a is listed as "Less than significant with mitigation incorporated". I agree that the overall assessment is probably correct, but there should be more discussion of potential impacts to surface waters and mitigation measures. The MM

B-3

## Comment Set B, cont. State Water Resources Control Board

HYD-1 is good, however it does not address improvements to stream and wetland crossings (if any?) which could result in temporary sedimentation/turbidity and other disturbances to channels and banks (if any?). It does sound like there may be potential for fill to waters of the state. BMPs could be implemented for crossing improvement activities that affect water quality to ensure that standards are not exceeded, and beneficial uses protected. Certainly, a mitigation measure could be to avoid and minimize impacts to wetlands and streams by establishing exclusionary buffers as necessary and avoiding them to the maximum extent possible. Where avoidance is not possible, BMPs can be implemented such as placing mats or portable bridges at crossings, preparing a land form and grading plan, and restoring impacted streams and wetlands to pre-Project conditions, as outlined in a Mitigation and Restoration Plan. This Plan should be submitted to the SWRCB and CDFW for approval and include seasonal and dry weather constraints associated with driving through stream crossings (if applicable). Restoration may include reseeding with native species or replanting, and specify monitoring and reporting requirements. If it's helpful to you, I will be happy to provide an example MND with these measures include and/or set up a conference call to discuss this further. Certainly, you will want to mention 401 certification conditions and potential Waste Discharge Requirements (if any fill is discharged to Waters of the State that are not considered jurisdictional by the US Army Corps of Engineers) in this discussion.

B-3 cont.

Checklist item 5.9.b: The groundwater discussion seems sufficient.

Checklist item 5.9.c-f: The information provided does not allow a conclusion that potential impacts are less than significant.

B-4

Thank you so much for considering my comments. If I can assist you in any way, I will be delighted to do so. I can be reached at the contact information provided below.

Best regards,

-Joanna

### **Joanna Jensen**

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