



Lahontan Regional Water Quality Control Board

December 23, 2025

File: Environmental Doc Review
San Bernardino County

Chris Heldreth
City of Barstow
220 East Main Street, Suite A
Barstow, CA 92311
cheldreth@barstowca.org

Comments on Draft Environmental Impact Report for the City of Barstow General Plan and Barstow International Gateway Project Draft Environmental Impact Report, State Clearinghouse No. 2024020501

Lahontan Regional Water Quality Control Board (Water Board) staff received the City of Barstow General Plan and Barstow International Gateway Project Draft Environmental Impact Report Draft Environmental Impact Report (DEIR) on November 10, 2025. The DEIR was prepared by PlaceWorks and Kimley Horn for the City of Barstow (City) and submitted in compliance with provisions of the California Environmental Quality Act (CEQA). Water Board staff, acting as a responsible agency, is providing these comments to specify the scope and content of the environmental information germane to our statutory responsibilities pursuant to CEQA Guidelines, California Code of Regulations (CCR), title 14, section 15096. We encourage the City to take this opportunity to integrate elements into the DEIR that: (1) promote watershed management; (2) support "Low Impact Development" (LID); and (3) reduce the effects of hydromodification. Our comments are outlined below.

WATER BOARD'S AUTHORITY

All groundwater and surface waters are considered waters of the State. Surface waters include streams, lakes, ponds, and wetlands, and may be ephemeral, intermittent, or perennial. All waters of the State are protected under California law. State law assigns responsibility for protection of water quality in the Lahontan Region to the Lahontan Water Board. Some waters of the State are also waters of the U.S. The Federal Clean Water Act (CWA) provides additional protection for those waters of the State that are also waters of the U.S.

The *Water Quality Control Plan for the Lahontan Region* (Basin Plan) contains policies that the Water Board uses with other laws and regulations to protect the quality of waters of the

State within the Lahontan Region. The Basin Plan sets forth water quality standards for surface water and groundwater of the Region, which include designated beneficial uses as well as narrative and numerical objectives which must be maintained or attained to protect those uses. The Basin Plan can be accessed via the Water Board's web site at

http://www.waterboards.ca.gov/lahontan/water_issues/programs/basin_plan/references.shtml.

RECOMMENDED ELEMENTS TO INCLUDE IN THE PLAN

We recommend the following be considered in the environmental review.

1. Healthy watersheds are sustainable. Watersheds supply drinking water, provide for recreational uses, and support ecosystems. Watershed processes include the movement of water (e.g. infiltration and surface runoff), the transport of sediment, and the delivery of organic material to surface waters. These processes create and sustain the streams, lakes, wetlands, and other receiving waters of our region.

The watershed approach for managing water resource quality and quantity is a collaborative process that focuses public and private efforts on the highest priority problems within a drainage basin. The Mojave Integrated Regional Water Management Group has assembled a collaborative group of stakeholders, both public and private, to address both water quantity and water quality issues within the Upper Mojave River Valley groundwater basin. A number of water management plans are being developed through that stakeholder collaboration process, and strategies continue to be developed and refined to sustain water quantity and to manage salts and nutrients to maintain the quality of groundwater and surface water resources.

2. The foremost method of reducing impacts to watersheds from development is LID, the goals of which are maintaining a landscape functionally equivalent to predevelopment hydrologic conditions and minimal generation of non-point source pollutants. LID results in less surface runoff and potentially less impacts to receiving waters, the principles of which include:
 - Maintaining natural drainage paths and landscape features to slow and filter runoff and maximize groundwater recharge;
 - Reducing compacted and impervious cover created by development and the associated road network; and
 - Managing runoff as close to the source as possible.

LID development practices that maintain aquatic values also reduce local infrastructure requirements and maintenance costs and benefit air quality, open space, and habitat. Vegetated areas for storm water management and infiltration onsite are valuable in LID.

3. Increased runoff from developed areas is a key variable driving a number of adverse effects, attention to maintaining the pre-development hydrograph will prevent or minimize many problems and will limit the need for other analyses and mitigation. Traditional methods for managing urban storm water do not adequately protect the environment and tend to treat symptoms instead of causes. Such practices have led to channelization and stream armoring that permanently alter stream habitat, hydrology, and aesthetics, resulting in overall degradation of a watershed.

Storm water control measures that are compatible with LID are preferred over more traditional methods. Examples include the use of bioretention swales, pervious pavement, and vegetated infiltration basins, all of which can effectively treat post-construction storm water runoff, help sustain watershed processes, protect receiving waters, and maintain healthy watersheds. Any particular one of these control measures may not be suitable, effective, or even feasible in every instance, but the right combination, in the right places, can successfully achieve these goals.

4. Hydromodification is the alteration of the natural flow of water through a landscape (e.g. lining channels, flow diversions, culvert installations, armoring, etc.). Disturbing and compacting soils, changing or removing the vegetation cover, increasing impervious surfaces, and altering drainage patterns limit the natural hydrologic cycle processes of absorption, infiltration, and evapotranspiration, and increases the volume and frequency of runoff and sediment transport. Hydromodification results in stream channel instability, degraded water quality, changes in groundwater recharge processes, and aquatic habitat impacts. Hydromodification also can result in disconnecting a stream channel from its floodplain. Floodplain areas provide natural recharge, attenuate flood flows, provide habitat, and filter pollutants from urban runoff. Floodplain areas also store and release sediment, one of the essential processes to maintain the health of the watershed. Information regarding hydromodification can be accessed online at

http://www.swrcb.ca.gov/water_issues/programs/stormwater/hydromodification.shtml

5. **Section 5.9.2.3 – Regional Water Quality Control Board Environmental Screening Levels** – The section incorrectly states that the Lahontan Regional Water Quality Control Board has adopted the Environmental Screening Levels (ESLs) set by the San Francisco Regional Water Quality Control Board. The Lahontan Regional Water Quality Control Board looks to the Office of Environmental Health Hazard Assessment (OEHHA) for assistance when ESLs are needed to be reviewed.
6. **Section 5.10.2.4 – San Bernardino County Municipal Separate Storm Sewer System Permit** – This section incorrectly describes how the municipalities are regulated under the Municipal Stormwater Program. The Municipal Storm Water Program regulates storm water discharges from municipal separate storm sewer systems (MS4s) throughout California. U.S. EPA defines an MS4 as a conveyance or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, man-made channels, or storm drains) owned or operated by a State (40 CFR 122.26(b)(8)).

Pursuant to the Federal Water Pollution Control Act (Clean Water Act) section 402(p), storm water permits are required for discharges from an MS4 serving a

population of 100,000 or more. The Municipal Storm Water Program manages the Phase I Permit Program (serving municipalities over 100,000 people), the Phase II Permit Program (for municipalities less than 100,000), and the Statewide Storm Water Permit for the State of California Department of Transportation. The State Water Resources Control Board (State Water Board) and Regional Water Quality Control Boards (collectively, the Water Boards) implement and enforce the Municipal Storm Water Program.

The Town of Apple Valley, the cities of Victorville and Hesperia, along with San Bernardino County collaborate as the Mojave River Watershed Group to fulfill the requirements of the MS4 Program. Each entity maintains its own permit coverage while working together towards common goals. The City of Barstow also has its own MS4 permit but has chosen to manage their program individually.

7. **Section 5.17.6 – Barstow International Gateway – Wastewater** – The section states “Rail yard wastewater would be collected and treated with an oil water separator before being discharged to the wastewater system.” The Water Board recommends that the BIG facility collaborate with the City of Barstow to determine whether the City of Barstow’s wastewater treatment plant (WWTP) has the capability to treat metal pollutants from railroad activities. Considerations should include any pretreatment, ensuring future compliance with state regulations by the WWTP.
8. **Impact 5.9-1** – The section states “...groundwater extracted from construction or operation well from these areas is not planned to be used as a potable water source.” The EIR should evaluate and discuss whether groundwater from this area will be used for non-potable or construction purposes. Given the high nitrate and total dissolved solids (TDS) concentrations from groundwater sourced in the vicinity of the former N&M Dairy, groundwater should be analyzed for nitrate and TDS and use dependent on concentration levels. The Water Board should be notified of high nitrate and TDS concentration groundwater use.

PERMITTING REQUIREMENTS

A number of activities that will be implemented have the potential to impact waters of the State and, therefore, may require permits issued by either the State Water Resources Control Board (State Water Board) or Lahontan Water Board. The required permits may include the following.

1. Streambed alteration and/or discharge of dredge and/or fill material to a surface water, including water diversions, may require a CWA, section 401 water quality certification for impacts to federal waters (waters of the U.S.), or dredge and fill WDRs for impacts to non-federal waters, both issued by the Lahontan Water Board.
2. Land disturbance of more than 1 acre may require a CWA, section 402(p) storm water permit, including a National Pollutant Discharge Elimination System (NPDES) General Construction Storm Water Permit, Water Quality Order (WQO) 2022-0057-DWQ, obtained from the State Water Board, or an individual storm water permit obtained from the Lahontan Water Board.

https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2022/wqo_2022-0057-dwq.pdf

3. Industrial facilities such as manufacturers, landfills, mining, steam generating electricity, hazardous waste facilities, transportation with vehicle maintenance, larger sewage and wastewater plants, recycling facilities, and oil and gas facilities are typically required to obtain Industrial General Permit coverage (IGP). This Project has been identified as needing to obtain coverage under the IGP which can be done on the SMARTS website at <https://smarts.waterboards.ca.gov/smarts/faces/SwSmartsLogin.xhtml>.
4. Water diversion and/or dewatering activities may be subject to discharge and monitoring requirements under either NPDES General Permit, Limited Threat Discharges to Surface Waters, Board Order No. R6T-2014-0049, or General Waste Discharge Requirements for Discharges to Land with a Low Threat to Water Quality, WQO-2003-0003, both issued by the Lahontan Water Board. Project proponents should consult with Water Board staff early on should implementation of individual projects result in activities that trigger these permitting actions. Information regarding these permits, including application forms, can be downloaded from our web site at <http://www.waterboards.ca.gov/lahontan/>.

Thank you for the opportunity to comment on the DEIR. If you have any questions regarding this letter, please contact me at (760) 241-7305 (tiffany.steinert@waterboards.ca.gov) or Christina Guerra, Senior Engineering Geologist, at (760) 241-7333 (christina.guerra@waterboards.ca.gov). Please send all future correspondence regarding this Project to the Water Board's email address at Lahontan@waterboards.ca.gov and be sure to include the Project name in the subject line.

 Digitally signed by
Christina Guerra
Date: 2025.12.23 15:29:27
-08'00'

(for) Tiffany Steinert
Engineering Geologist

cc: State Clearinghouse (SCH No. 2024020501) (state.clearinghouse@opr.ca.gov)
California Dept. of Fish and Wildlife (AskRegion6@wildlife.ca.gov)