Lahontan Regional Water Quality Control Board

September 16, 2025

File: Environmental Doc Review
Los Angeles County

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Comments on the Initial Study/Negative Declaration, Littlerock Creek Recharge Project, Los Angeles County, State Clearinghouse Number 2024120568

The California Regional Water Quality Control Board, Lahontan Region (Water Board) staff received the Initial Study/Negative Declaration (IS/ND) for the above-referenced Project (Project) on August 20, 2025. The IS/ND was prepared by HELIX Environmental Planning, Inc. (Contractor) and submitted in compliance with provisions of the California Environmental Quality Act (CEQA) in order to solicit input on the potential impacts on the environment and ways in which those significant effects are proposed to be avoided or mitigated. Based on our review of the IS/ND, we recommend the following: (1) the IS/ND acknowledge that if any of the water discharged to Littlerock Creek contains wastewater, the Project may require a permitting action by the Water Board; (2) the IS/ND address how water from the California Aqueduct may affect Littlerock Creek's natural water quality; and (3) the IS/ND address how, if any, the increase in groundwater levels may impact cleanup sites in the basin. Our comments are outlined below.

WATER BOARD'S AUTHORITY

All groundwater and surface waters are considered waters of the State. 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 United States. The Federal Clean Water Act (CWA) provides additional protection for those waters of the State that are also waters of the United States.

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

COMMENTS ON THE ENVIRONMENTAL REVIEW

1. Section 2.X.a. states that the "…quality of State Water Project (SWP) water delivered at the project location is tested by the Antelope Valley State Water Contractors Association (AVSWCA) member agencies at several water treatment plant locations along the SWP." Water Board staff has concerns whether the SWP water will change Littlerock Creek's natural water quality. The environmental document should indicate how much, if any, the SWP water will affect the creek's natural water quality parameters (such as pH, temperature, dissolved oxygen, etc.).

2. Section 2.X.e. states that the "…Project would not substantially degrade groundwater quality, would increase groundwater supplies…" Water Board staff have concerns about the effect of groundwater recharge on any basin plumes. We would like to see that due diligence has been undertaken on potential effects on cleanup sites, if any, in the Antelope Valley Groundwater Basin caused by rising groundwater levels. For example, if there are soil-locked contaminants that could be introduced to groundwater due to rising groundwater levels. If there are no sites that could be affected, please indicate this.

PERMITTING REQUIREMENTS

The Project overview indicates that the Project involves diverting water from the California Aqueduct to Littlerock Creek, and no physical improvements or construction will be done. Water from the California Aqueduct will comprise of the SWP water, which is collected from natural river sources in northern California. Therefore, waste discharge requirements permitting will not be necessary unless there is wastewater contained in the discharge.

We request that the draft IS/ND recognize potential permits may be required for the Project, as described above, and identify the specific activities that may trigger these permitting actions in the appropriate sections of the environmental document. Information regarding these permits, including application forms, can be downloaded from our website at http://www.waterboards.ca.gov/lahontan/. Early consultation with Water Board staff regarding potential permitting is recommended.

If you have any questions regarding this letter, please contact me at (760) 313-1298 (aileen.chea@waterboards.ca.gov) or Reginald Tan, Senior Water Resource Control Engineer, at (760) 241-2434 (reginald.tan@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.



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cc: Hunter Stapp, HELIX Environmental Planning, Inc. (hunters@helixepi.com)
State Clearinghouse (SCH 2024120568) (state.clearinghouse@opr.ca.gov)