

3.9 WATER QUALITY AND STORMWATER RUNOFF

1. The DEIR/DEIS does not adequately evaluate potential water quality impacts that may be created by the project from groundwater dewatering, groundwater pumping and stormwater runoff, CEQA (§15020, §15126.2, §15126.4).

Mitigation measures WQ-3 in Section 3.9 for tunnel boring activities does not contain mitigation measures, CEQA (§15126.4). The groundwater monitoring discussion for WQ-3 fails to identify the specific water quality affects that are expected during tunnel boring operations. The WQ-3 mitigation measure fails to describe what will happen if excursions are observed and what level of observed change will trigger project shut downs and what mitigation will be required to restart the project.

Known contaminated plumes of groundwater are located close to the south portal of the Freeway Tunnel and LRT options and could migrate to non-contaminated wells depending on TBM water requirements and dewatering requirements⁷. Similar impacts may be possible at the north portal¹. The constituents in the plumes that need to be monitored should be included in the Regional Board's dewatering permits referenced in mitigation measure WQ-2 and in any groundwater monitoring plan. Also, the fate of any contaminated water that is transported to the Manning and Olive Pits with tunnel tailings or spoil should also be examined in the Final EIS/EIR.

The response to Question XVIIb¹ and XVIIId¹ of the CEQA Initial Study should also consider plume movements of groundwater contaminants that migrate because of project activities. Some of the water purveyors that would supply water to the project operate groundwater recovery facilities to remove groundwater contamination. The impact of the project on these facilities should also be evaluated in the Final EIR/EIS, pursuant to CEQA (§15020, §15126.2, §15126.4).

All of the responses to Question IX in the Initial Study are either “no impact” or “less than significant impact” with no mention of mitigation measures proposed in Section 3.9 or the mitigation measures referenced in the justification of the Question IX responses. The DEIR/DEIS is inadequate because the responses, at the very least, should be *less than significant impact with mitigation*, CEQA (§15020, §15126.2, §15126.4).

Question IXa² of the CEQA Initial Study cannot be answered accurately without knowing specific project water demands, dewatering quantities or the source and quality of water supplies to be utilized. Transport of contamination through plume migration is possible during dewatering operations depending on location and dewatering quantities.

¹ San Gabriel Valley Water Quality Authority, web site.

² **IX. HYDROLOGY AND WATER QUALITY:** Would the project: a) Violate any water quality standards or waste discharge; b) 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)? f) Otherwise substantially degrade water quality?

Question IXb⁸ of the CEQA Initial Study also requires a discussion of water supply sources and expected water demands as well as expected groundwater depletion rates that could result from dewatering activities. A determination of impacts to existing production wells has been deferred to others in violation of CEQA (§15020).

Question IXf⁸ of the CEQA Initial Study does not present sufficient justification to rule out water quality degradation from stormwater runoff. Mitigation is required. The Final EIR/EIS should describe and analyze mitigation measures.