

## Comment Letter S4

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**From:** Odermatt, John@Waterboards <John.Odermatt@waterboards.ca.gov>  
**Sent:** Monday, March 19, 2018 8:27 AM  
**To:** LUEG, PalomarMP  
**Cc:** Samrad, Laura@Waterboards; Sawyer, Tony  
**Subject:** San Diego Water Board comments: Master Plan Update and PEIR, Palomar Airport  
**Attachments:** Final Palomar Airport PEIR Comments\_signedjro\_3\_19\_18.pdf

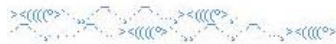
Dear Representative,

Please see attached written comments from the California Regional Water Quality Control Board, San Diego Region (San Diego Water Board) concerning the Proposed Master Plan Update and Draft Program Environmental Impact Report (EIR) for the Palomar Airport. The San Diego Water Board appreciates this opportunity to review and comment on the Master Plan update and PEIR. If you have any questions, please contact Ms. Laura Samrad (tel 619-521-5895 or [Laura.Samrad@waterboards.ca.gov](mailto:Laura.Samrad@waterboards.ca.gov)).

S4-1

Regards,

John R. Odermatt, M.Sc., PG, Senior Engineering Geologist  
California Regional Water Quality Control Board - San Diego Region  
2375 Northside Drive, Suite 100,  
San Diego, CA 92108-2700  
OFFICE TEL: 619-521-5906  
GENERAL OFFICE TEL: 619-516-1990



**RWQCB WEB PAGES:**

Drought/Water Conservation

information: [http://www.waterboards.ca.gov/water\\_issues/programs/conservation\\_portal/emergency\\_regulation.shtml](http://www.waterboards.ca.gov/water_issues/programs/conservation_portal/emergency_regulation.shtml)

San Diego Water Board Home Webpage: [www.waterboards.ca.gov/sandiego](http://www.waterboards.ca.gov/sandiego)



CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY  
SAN DIEGO REGIONAL WATER QUALITY CONTROL BOARD



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**San Diego Regional Water Quality Control Board**

March 19, 2018

**In reply refer to:**  
**L10003501496:LSamrad**

County of San Diego  
Department of Public Works  
Airport Division  
5510 Overland Avenue, Suite 410  
San Diego, CA 92123  
Attn: Ms. Cynthia Curtis

**Subject: Palomar Airport Master Plan Update/Draft Program Environmental Impact Report, January 2018**

Ms. Curtis:

The California Regional Water Quality Control Board, San Diego Region (San Diego Water Board) has reviewed the January 2018 Palomar Airport Master Plan Update and Draft Program Environmental Impact Report (Plan).<sup>1</sup> The following are San Diego Water Board comments regarding water issues related to the twenty year Master Plan. We understand that the County of San Diego (County) has not yet allocated funding to make the improvements proposed in the Plan and that the current version of the Plan contains only a broad timeline. Further, additional environmental analyses under the California Environmental Quality Act (CEQA) will be required for individual elements/projects at the time they are designed and proposed. The Plan divides the proposed projects into three phases: near term (0-7 years), intermediate term (8-12 years) and long term (13-20 years).

The Plan includes six potential build alternatives and one "No Project Alternative." The proposed alternative is referred to as the "D-III Modified Standards Compliance Alternative in the Master Plan Update."

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<sup>1</sup> Master Plan Update and PEIR (2018):

[https://www.sandiegocounty.gov/content/dam/sdc/dpw/AIRPORTS/palomar/documents/CRQ\\_Master\\_Plan\\_Update-Draft\\_PEIR.pdf](https://www.sandiegocounty.gov/content/dam/sdc/dpw/AIRPORTS/palomar/documents/CRQ_Master_Plan_Update-Draft_PEIR.pdf)

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THOMAS MORALES, CHAIR    DAVID GIBSON, EXECUTIVE OFFICER

2375 Northside Drive, Suite 100, San Diego, California 92108-2700    [www.waterboards.ca.gov/sandiego](http://www.waterboards.ca.gov/sandiego)

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**Water Quality Issues/Permits:**

In May 2013, the San Diego Regional Water Quality Control Board (San Diego Water Board) adopted Order R9-2013- 0001 – National Pollutant Discharge Elimination System Permit and Waste Discharge Requirements for Discharges from the Municipal Separate Storm Sewer Systems (MS4) Draining the Watersheds within the San Diego Region. That Order was amended by Order Nos. R9-2015-0001 (February 11, 2015) and R9-2015-0100 (November 18, 2015) and are collectively referred to here as the “2013 Permit;”<sup>2</sup> rather than the citation given in the Plan (see page 3-73). The 2013 Permit requires the owners of storm drain systems, municipal agencies or Responsible Agencies, to implement management programs to limit discharges of non-storm water runoff and pollutants from the storm drain systems. The Permit requires Responsible Agencies in each of the region’s watersheds to develop Water Quality Improvement Plans (WQIPs). The Carlsbad Watershed Management Area WQIP was developed in response to the requirements of the 2013 Permit, a revised WQIP was accepted by the San Diego Water Board on November 22, 2016, and the final Carlsbad was provided to the San Diego Water Board in January 2017 . The Plan indicates that several of the redevelopment elements qualify as “Priority Development Projects” and the County should ensure that the qualifying project elements comply with all the applicable requirements of the WQIP, the 2013 Permit, and the most current statewide Construction General Storm Water Permit.<sup>3</sup>

The State Water Resources Control Board and the Regional Water Quality Control Boards regulate the discharge of waste to waters of the State via the 1969 Porter-Cologne Water Quality Control Act codified into the California Water Code (Division 7, sections 130000 *et seq.*). State waters that are not also classified as federal waters (*i.e.* areas not regulated by the CWA) may be regulated under the Water Code. A Report of Waste Discharge (ROWD) may be filed with the San Diego Water Board for projects that result in discharge of waste into waters of the State (includes surface water and groundwater). The San Diego Water Board may issue Waste Discharge Requirements or a waiver for waters of the State or a 401 Water Quality Certification for impacts to waters of the United States. The Plan indicates (see section 2.2.5 Mitigation- Impact BI-3: Items M-BI-3 and M-BI-5) that impacts to vernal pools located adjacent to proposed construction is anticipated to occur. The State or federal permitting process may require modification for each segment of the larger 20-year three phased approach which the Plan presents.

The airport is partially located within the hydrologic unit of Agua Hedionda Creek, which is included on federal 2014 CWA Section 303(d) List<sup>4</sup> as a “water segment

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<sup>2</sup> See Order No. R9-2013-0001, as amended by Order Nos. R9-2015-0001 and R9-2015-0100: [https://www.waterboards.ca.gov/sandiego/water\\_issues/programs/stormwater/docs/2015-1118\\_AmendedOrder\\_R9-2013-0001\\_COMPLETE.pdf](https://www.waterboards.ca.gov/sandiego/water_issues/programs/stormwater/docs/2015-1118_AmendedOrder_R9-2013-0001_COMPLETE.pdf)

<sup>3</sup> Currently State Water Board Order No. 2009-009-DWQ: [https://www.waterboards.ca.gov/water\\_issues/programs/stormwater/construction.html](https://www.waterboards.ca.gov/water_issues/programs/stormwater/construction.html)

<sup>4</sup> Regional Board 9 –San Diego Region 2014 California 303(d) list of Water Quality Segments (Category 5): [https://www.waterboards.ca.gov/sandiego/water\\_issues/programs/303d\\_list/docs/App\\_B1\\_category5\\_report.pdf](https://www.waterboards.ca.gov/sandiego/water_issues/programs/303d_list/docs/App_B1_category5_report.pdf)



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where standards are not met and a TMDL is required, but not yet completed, for at least one of the pollutants being listed for this segment” (Category 5). As of 2016, the actual listed water quality impairments for the Agua Hedionda Creek include: benthic community effects, toxicity, pesticides (proposed bifenthrin, chlorpyrifos, cypermethrin, malathion), indicator bacteria (a proposed name change), manganese, selenium, total dissolved solids, and nutrients (nitrogen and phosphorus).<sup>5</sup> A tributary of Agua Hedionda Creek, is located near the project site.

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Storm water runoff from each phase of the proposed project may need to be modified (SWPPP) through the San Diego Water Board for each segment of the proposed project. Runoff from the project does not directly discharge into Agua Hedionda Creek, however, construction of each of the segments will need to be carefully evaluated individually at each of the three phase of the proposed project construction.

**Landfill Issues:**

Portions of the airport are underlain by three units of an inactive landfill. The landfill is currently regulated by Waste Discharge Requirements (WDR) Order No. 96-13 (and Addendum 1) and Monitoring and Reporting Program No. 96-13).<sup>6</sup> The WDR requires the County to:

1. inspect and maintain the landfill cover system, storm water conveyance system, and water quality monitoring systems; and
2. report results of inspections and water quality monitoring semi-annually to the San Diego Water Board.

S4-2

The “Palomar Airport Landfill” is listed in the GeoTracker Database as a Landfill (under title 27- Closed, Abandoned, Inactive site) with a required detection monitoring program. There are three landfill units containing approximately 195,000 cubic yards of wastes and located in three relatively small canyons on the north side of Palomar Airport Road (landfill unit locations are illustrated in Figure 2.3.1 in the Plan). Units 1 and 2 are paved areas currently used for hangars and parking airplanes. Unit 3 (easternmost unit) is unpaved, and an engineered landfill cover inhibits precipitation from infiltrating into the trash.

Engineered changes to the landfill cover system, in support of constructing an extension of taxiway, a retaining wall located along the southern slope of the Airport, or other potential modifications; may affect the integrity of the landfill cover.

S4-3

<sup>5</sup> Proposed updates to 303(d) List of Impaired Water Bodies (2016):

[https://www.waterboards.ca.gov/sandiego/water\\_issues/programs/303d\\_list/docs/App\\_A\\_Proposed\\_Updates\\_to\\_the\\_303\(d\)\\_List.pdf](https://www.waterboards.ca.gov/sandiego/water_issues/programs/303d_list/docs/App_A_Proposed_Updates_to_the_303(d)_List.pdf)

<sup>6</sup> The San Diego Water Board issued Order No. 96-13 and Monitoring and Reporting Program No. 96-13 on February 8, 1996; and Addendum No. 1 to Order No. 96-13 on March 4, 2001.

[https://www.waterboards.ca.gov/sandiego/board\\_decisions/adopted\\_orders/orders1990s.html](https://www.waterboards.ca.gov/sandiego/board_decisions/adopted_orders/orders1990s.html)

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The current landfill cover is reportedly comprised of a soil cover ranging from 2 to 7 feet in thickness, except for some limited locations on Unit 2 where asphalt may be up to 12 feet thick.<sup>7</sup> A number of factors will need to be evaluated for proposed engineering modifications to the slopes or the top deck of the landfill cover. The protective cap is a non-permeable layer that are designed to exclude water infiltration. The County may also be prohibited from installing utilities in or below any landfill layer intended for final cover (CalRecycle, 2007).

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Since 2002, the sub-drain system has discharged polluted groundwater into a sump located downgradient of Unit 1. Dewatering, grading or construction in this area of the Palomar Airport may require that solid, liquid or gaseous wastes be managed and disposed of in compliance with applicable federal, State and local requirements. Geosyntec reported analytical results from samples of groundwater collected from the sub-drain system (Geosyntec, 2017, October 2016- March 2017, and 2016 Annual Monitoring Report in GeoTracker:

[https://geotracker.waterboards.ca.gov/esi/uploads/geo\\_report/3441865921/L10003501496.PDF](https://geotracker.waterboards.ca.gov/esi/uploads/geo_report/3441865921/L10003501496.PDF) ) as:

Parameter	Water Quality Objective <sup>a</sup>	Sump sample (1/4/2017)
Chloride	800 mg/L	6,200 D mg/L
Sulfate	500 mg/L	1,700 mg/L
Total Dissolved Solids (TDS)	3,500 mg/L	13,800 mg/L
1,4 Dichlorobenzene	5.0 µg/L	<0.43 µg/L
Benzene	1.0 µg/L	<0.14 µg/L
cis-1,2- Dichloroethene	6.0 µg/L	9.6 D µg/L
Tetrachloroethene (PCE)	5.0 µg/L	<0.39 µg/L
Trichloroethene (TCE)	5.0 µg/L	3.7 J µg/L
Vinyl Chloride	0.5 µg/L	<0.30 µg/L

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- a = Basin Plan Water Quality Objective or State/Federal Maximum Contaminant Level (MCL)  
 J = Estimated concentration detected between Reporting Limit and Method Detection Limit (MDL)  
 D = The concentration is reported from analysis of a diluted sample.

Drilling into the landfill Unit 3 may require specialized drilling methods, as waste may be encountered.

Substance Handling (see section 2.3.2.1 of the Plan) and Projects with Existing On-site Contamination (section 2.3.2.2 of the Plan). Any construction, grading or drilling work that produces a waste stream (e.g., solid waste, liquid waste, landfill gas, etc.) from the contents of the landfill must include a plan for managing and disposing of the waste stream(s) in compliance with all federal, State and local requirements.

S4-5

<sup>7</sup> Phase II Evaluation Monitoring Program, Palomar Airport Landfill – Unit 2, San Diego California; dated October 2006: [https://geotracker.waterboards.ca.gov/esi/uploads/geo\\_report/3818743646/L10003501496.PDF](https://geotracker.waterboards.ca.gov/esi/uploads/geo_report/3818743646/L10003501496.PDF)



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Permanent pressurized irrigation lines should not be installed on the surface of the landfill, including the slopes. Any leakage of pipes, valves, and irrigation meters, may be create conditions that may be considered an illicit discharge by the San Diego County Solid Waste Local Enforcement Agency and the San Diego Water Board.

S4-6

Vegetation planted to stabilize engineered slopes on the landfill should include low maintenance, native species with shallow roots. Appropriately chosen native species should require a minimum amount of irrigation and help to maintain the integrity of the landfill covers system.

In addition to a "Soil Management Plan," the County should plan to prepare and submit a Report of Waste Discharge (ROWD)<sup>8</sup> including detailed project specific engineering design and construction work that may impact the current location of wasters and configuration or integrity of any portion(s) of the landfill cover, the existing sub-drain system, or water quality monitoring system. A ROWD is required for any project affecting those landfill related systems and associated with implementation of any element(s) of the redevelopment Plan for the Palomar Airport. The information provided in a ROWD is necessary for the San Diego Water Board to assess the potential impacts to the integrity of the existing landfill cover system, the continued function of the water quality monitoring systems, and any potential need to revise or amend existing requirements of Order No. 96-13.

S4-7

Please submit all future responses to the San Diego Water Board by email. The email submittals must include a signed cover or transmittal letter (with the facility name, facility contact information, and reference code **L10003501496:LSamrad**), and be sent via email to [sandiego@waterboards.ca.gov](mailto:sandiego@waterboards.ca.gov). Routine email correspondence may be sent to individual San Diego Water Board staff members.

Documents that are 50 megabytes or larger should be transferred to a disk and mailed to the San Diego Water Board. Please make sure the electronic files on any disk are not password protected. For more extensive information provided in ROWDs or large documents, the San Diego Water Board staff may request that specific individual items such as appendices, complex technical reports, large drawings, grading plans, or maps continue to be provided in paper format. If you have any specific questions about email submittal procedures please contact our Mission Support Unit, at 619-516-1990.

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<sup>8</sup> As required by Water Code section 13260.

Ms. Curtis

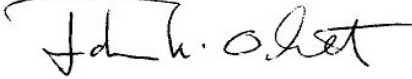
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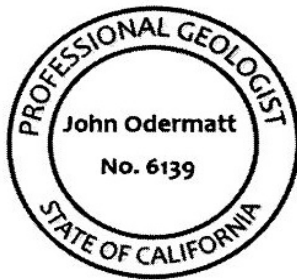
In the subject line of any response, please include the reference code  
**L10003501496:LSamrad**. Please contact Ms. Laura Samrad at 619-521-5895, or at  
[Laura.Samrad@waterboards.ca.gov](mailto:Laura.Samrad@waterboards.ca.gov) if you have any questions.

S4-8  
cont.

Sincerely,



John R. Odermatt, M.Sc., B.Sc., PG, Senior Engineering Geologist  
Groundwater Protection Unit



JRO:las

Cc: Mr. Tony Sawyer, County of San Diego, Department of Public Works  
Landfill Management, via email [tony.sawyer@sdcounty.ca.gov](mailto:tony.sawyer@sdcounty.ca.gov)

Tech Staff Info & Use	
WDR No.	R9-1996-013
MRP No.	R9-1996-013
Party ID	11763, 551803
Place ID	247472
Reg Measure	420159
Geotracker ID	L10003501496

**Response to Letter S4****State of California, Regional Water Quality Control Board – San Diego**

- S4-1** This comment provides introductory and background information on the water quality plans and permits implemented by the San Diego Regional Water Quality Control Board (RWQCB) that are applicable to the individual elements of the Master Plan Update. PEIR Section 3.1.6 evaluated implementation of the Master Plan Update and its effects on water quality, specifically regulatory compliance. Section 3.1.6.2.3 concluded that as individual activities are proposed under the Master Plan Update and PEIR, they will be evaluated to ensure full compliance with the standards set forth by the County, including all applicable regulatory ordinances in effect at that time. To reduce the potential impacts to water quality, individual activities would also be required to comply with the SWRCB Construction General Permit and the NPDES Municipal Permit, as applicable, which would require the implementation of a Storm Water Pollution Prevention Plan (SWPPP), thereby conforming to applicable federal, state, or local “Clean Water” statutes or regulations. Implementation of these measures would comply with state and federal water quality regulations and reduce potential water quality impacts to less than significant. No changes to the PEIR have been made in response to this comment.
- S4-2** This comment summarizes the existing Waste Discharge Requirements and Monitoring and Reporting Program, including issuance dates, for the portions of the airport underlain by three units of inactive landfill. No changes to the PEIR have been made in response to this comment, and no further response is required.
- S4-3** This comment states that an extension of the existing taxiway and other modifications may affect the integrity of the landfill cover, and it states the County is required to adhere to CalRecycle 2007 requirements. The County presumes the CalRecycle 2007 citation is in reference to the State of California Inspection Guidance for State Minimum Standards at Closed, Illegal, and Abandoned Disposal Sites as cited in the PEIR Section 2.1.2.1. The County concurs that as individual project elements are proposed that would require excavation, grading, or other earthwork activities over the inactive landfill, engineering design plans would be needed to ensure the protective cap on the inactive landfill maintains a non-permeable layer designed to exclude water infiltration. As discussed in the PEIR Section 2.1.2.1, the County is also aware of the prohibitions of installing utilities in or below landfill layer intended for final cover. The County would also incorporate structural design recommendations from a detailed subsurface geotechnical evaluation report.

Additionally, the County would prepare a Stormwater Water Pollution Prevention Plan (SWPPP) and implement pre- and post-construction Best Management Practices (BMPs), in consultation with the San Diego County Regional Water Quality Control Board, which would minimize the potential for unstable soils.

No changes to the PEIR have been made in response to this comment.

- S4-4** This comment states that polluted groundwater is located downgradient of the inactive landfill Unit 1, and dewatering, grading, or construction in this area may require that solid, liquid, or gaseous wastes be managed and disposed of in compliance with applicable federal, State and local requirements. As noted in the PEIR, the County anticipates a potentially significant impact would occur from hazards or hazardous materials regarding grading and/or excavation activities over the inactive landfill units or other areas of known contaminated soil and/or groundwater. As a result, Mitigation Measure M-HZ-1 would be implemented to reduce this impact to less than significant. No changes to the PEIR have been made in response to this comment.



**S4-5** This comment states that specialized drilling methods may be required as waste is encountered during drilling activities. It also states that any construction activities that produce waste must include a plan for managing and disposing of the waste. The County acknowledges the Proposed Project would include construction activities located over an inactive landfill. Please see **Response to Comment S4-3**. In addition, the PEIR disclosed that Mitigation Measure M-HZ-1 would be implemented prior to grading or excavation over the inactive landfill. This mitigation measure identifies that a Soil Management Plan (or equivalent remediation plan) shall be prepared in accordance with applicable federal, state, and local requirements for the purpose of removing, treating, or otherwise reducing potential contaminant concentrations to below human or ecological health risk thresholds. The Soil Management Plan (or equivalent remediation plan) shall outline methods for characterizing and classifying soil for off-site disposal, as needed, during site development.

As this comment does not specifically identify an environmental issue with the PEIR analysis or proposed mitigation, no changes to the PEIR have been made in response to this comment.

**S4-6** This comment states that permanent pressurized irrigation lines should not be installed on the surface of the inactive landfill. The County concurs with this comment, and PEIR Section 2.1.2.1 included a similar statement. No changes to the PEIR have been made in response to this comment.

**S4-7** The comment states that the County should prepare a Report of Waste Discharge (ROWD) for the RWQCB to assess potential impacts to the existing landfill cover system, the continued function of the water quality monitoring systems, and any potential need to revise or amend existing requirements of Order No. 96-13. The County agrees that as individual project elements are proposed that may encounter inactive landfill materials during construction, engineering design plans would be needed to analyze potential impacts to the integrity of any portion(s) of the landfill cover, existing sub-drain system, or water quality monitoring system.

As described in the PEIR, the exact scope, scale, and timing for construction of the Master Plan Update elements will be determined once elements are proposed that may encounter inactive landfill materials during construction. At that time, the County would coordinate with RWQCB to ensure all applicable permitting is secured, and all applicable monitoring and reporting is conducted.

**S4-8** These are conclusion comments. They do not raise specific issues regarding the content of the PEIR, but will be included as part of the administrative record and made available to the County Board of Supervisors prior to a final decision on the Proposed Project.