

DEPARTMENT OF WATER RESOURCES

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June 17, 2020

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Governor's Office of Planning & Research

Mr. Nathan Perez, Senior Planner
City of Perris, Planning Division
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Jun 17 2020

STATE CLEARINGHOUSE

SCH# 2018101050 Tentative Tract Map 36647 and East Detention Basin Case (16-05216) General Plan Amendment Case (GPA 16-05217), and Zone Change Case (ZC 16-05218) Mitigated Negative Declaration (MND)

Dear Mr. Perez:

The California Department of Water Resources (DWR) State Water Projects Division of Operations and Maintenance (O&M) staff have reviewed City of Perris' Initial Study (IS) and MND for the Tentative Tract Map and East Detention Basin Case and General Plan Amendment Case and Zoning Change Case. DWR has the following comments.

Project Description and General Comments

The proposed project site is located northerly adjacent to Ramona Express Way and DWR's right-of-way for the planned Perris Dam Emergency Water Conveyance System. The project is east of Oleander Avenue and Perris Storm Drain Channel, and west of Evans Road and Tract 32707 and Tract 32708 in Perris, California. The project would allow construction of a detention interim stormwater basin in the southern 29-acre portion of the project and a 24-acre subdivision at the northwest quadrant of Evans Road and Ramona Expressway. The subdivision is located north of Ramona Expressway and DWR's right-of-way, south of TTM 36648, east of the Perris Valley Storm Drain and west of Evans Road.

The project site has historically been used for agricultural purposes and currently is vacant land. The project site is relatively flat, naturally sloping from northeast to southwest towards the existing Perris Valley Channel, and partially within the existing flood plain.

Specific Comments

DWR May Be a Public Agency Whose Approval Is Required.

Where a project receives a discretionary permit from State agencies, the issuing agencies are considered "other public agencies whose approval is required". DWR possesses a right-of-way adjacent to Ramona Parkway, Evans Road, and the proposed development. If the proposed project encroaches on DWR's right-of-way, it is an identifiable impact to DWR's right-of-way and an encroachment permit will be required. Please include DWR on page 1 of the IS/MND document as a public agency whose approval is required.

Transportation

The Transportation Mitigation Measures, TRA-01 through TRA-03, include the construction of full width street improvements to streets within the project and on Evans Road. On page 2-5 of the IS/MND's Appendix 11, Revised Traffic Impact Analysis Report, Stratford Ranch Residential (TTM36647), Perris, California and in Appendix 13, Evans Road Lane Geometrics includes a notation of "Ultimate Improvements by DWR." Appendix 12, Evans Road Safety memo explains a second phase of improvements associated with the TTM36647 (just south of TTM36648) includes widening Evans Road to the ultimate cross widening section from the southerly line of Tract 32708 to the northerly DWR easement line. Appendix 12 refers to Appendix 13 for the Evans Road exhibit for geometrics.

The MND does not provide an explanation as to the MND's meaning nor expectations associated with the term "ultimate improvements by DWR." DWR is unable to ascertain whether the term is referring to DWR's use of the right-of-way for a DWR project nor how these ultimate improvements by DWR are related to the transportation mitigation measures. DWR's right-of-way along Ramona Expressway is for the upcoming construction of the Perris Emergency Release Facility. The facility will be a large water conveyance channel, ~100' wide and ~15' deep, paralleling Ramona Expressway. The new channel will be excavated from existing ground and a new bridge will be built on Evans Road just north of Ramona Expressway.

DWR requests the MND include additional information on the meaning and significance of the notation "ultimate improvements by DWR" that is found in the appendices to the Transportation section. If the "ultimate improvements by DWR" is referring to the construction of the Evans Road bridge as part of the Perris Emergency Release Facility

project, DWR requests the MND includes that information in the transportation analysis and explain that the improvements are unrelated to the transportation mitigation measures, if that is the case.

Based on the information provided, none of the proposed project's street improvements appear to extend into DWR's right-of-way. However, if any street improvements, such as curb, gutter, and sidewalk improvements may extend into the DWR right-of-way, a DWR encroachment permit may be required.

Information regarding DWR encroachment permits can be found at:
<https://water.ca.gov/Work-With-Us/Real-Estate/Encroachment-Permits>.

Hydrology and Water Quality Management

The IS/MND finds the proposed project impacts of altering existing drainage patterns of the area will increase the rate or amount of surface runoff in a manner which would result in offsite flooding impacts that are less than significant. In the explanation of checklist answers, the project site is described as relatively flat, naturally sloping from the northeast to the southwest direction towards the existing Perris Valley Storm Drain Channel, and partially within the existing flood plain. The proposed project would result in the conversion of on-site permeable surfaces to impermeable surfaces, which would alter the current drainage pattern of the project site. By increasing the amount of impervious surfaces on the site, more surface runoff would be generated and the rate of runoff could increase. To manage the increase of surface runoff, the proposed project would design BMPs in the form of a Bioretention basin that would capture the runoff and discharge it into the Perris Valley Storm Drain Channel.

The Hydrology and Water Quality analysis does not provide adequate analysis on surface runoff to the existing flood plain. This analysis is needed, because unless authorized by DWR, California Water Code 12899.6 prohibits draining of water or permitting water to be drained from the person's lands onto the State Water Resources Development System right-of-way, by any means, which results in damage to the system or DWR's right-of-way, except where the water drains naturally onto the right-of-way.

While the IS/MND explains the project site and Evans Road slope southward toward DWR's right-of-way, the IS/MND and hydrology report do not indicate whether the project site includes Evans Road and other street improvements in the impermeable surfaces analysis. Due to the lack of this information, the MND does not adequately

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analyze the potential impacts of offsite flooding, and whether surface runoff would flow to DWR's right-of-way. DWR requests the hydrologic impacts analysis include the requested additional information which is necessary to determine whether the project requires an encroachment permit from DWR.

If you have any questions, please contact Jonathan Canuela by phone at 916-653-5095 or by electronic mail at: Jonathan.Canuela@water.ca.gov.

Please provide DWR with a copy of any project documents when available by mail to:

Jonathan Canuela, Water Resources Engineering Associate
State Water Project Right-Of-Way Management Section
Division of Operations and Maintenance
Department of Water Resources
1416 Ninth Street, Room 631
Sacramento, California 95814

Sincerely,

A handwritten signature in black ink, appearing to read 'Casey Pancaro', with a stylized flourish at the end.

Casey Pancaro
Staff Attorney