

DEPARTMENT OF WATER RESOURCES

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March 11, 2020

Governor's Office of Planning & Research

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STATE CLEARINGHOUSE

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SCH# 2020029035 Proposed Commercial Development Initial Study/Mitigated Negative Declaration (IS/MND)

Dear Mr. Leonard,

The California Department of Water Resources (DWR) State Water Project's Division of Operations and Maintenance (O&M) staff has reviewed the IS/MND for the Proposed Commercial Development (Project). DWR has the following comments:

Project Description

The Project is a proposed commercial development which consists of a 123,748 square-foot industrial building and an 8,865 square-foot office building on 8.2 acres within a 9.5-acre gross (comprised of two parcels; grading; parking lot paving; sidewalk improvements; and a 0.1-acre vegetated swale) located at the southwest corner of Highway 395 and Poplar Street. The Project includes a lot-line adjustment which would result in a separate 1.26-acre parcel in the northwest portion of one lot. The Project is approximately 1.5 miles southwest and upslope of the California Aqueduct (Aqueduct), a component of the State Water Project (SWP).

General Comments

The purpose of an Initial Study is to provide documentation of the factual basis for the finding in a Negative Declaration that a project will not have a significant effect on the environment. The lead agency needs to provide a brief explanation for all answers except "No Impact" answers. A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards. The IS/MND does not provide adequate documentation of the factual basis for the finding of no impacts to Hydrology and Water Quality impacts.

Specific Comments

We request the following comments be addressed:

IX Hydrology and Water Quality

The IS/MND explains the Project may change absorption rates and potential drainage patterns, and the amount of surface water runoff. To address these potential Project impacts, the Project includes an approved drainage system to be designed in accordance with the City of Hesperia Resolution 89-16. The existing runoff, generated under the equivalent of a no project alternative, would continue to discharge onto the surrounding streets. To comply with The City's requirement of an on-site stormwater detention and/or retention facilities for all additional drainage created by the development within the Project, a drainage system on the northwest side of the property and an on-site swale located at the southwest corner of Highway 395 and Poplar Street is included in the design. The drainage system would prevent impacting downstream properties. The on-site 0.1-acre vegetated swale would capture Project storm-water runoff.

The IS/MND does not provide adequate information for a person to understand the basis of the no impacts conclusions in the Project's hydrology impacts checklist. The City is aware of DWR's ongoing concerns related to the existing and growing unattenuated stormwater runoff in Hesperia due to development. DWR has advised the City consistently over many years that any project which contributes unattenuated stormwater runoff towards the Aqueduct culvert at milepost 394.5 may significantly impact SWP operations, either individually or cumulatively with other development projects. The IS/MND does not contain adequate information as to how the design features would capture the Project's unattenuated stormwater runoff that would otherwise flow to the Aqueduct's milepost 394.5.

Under CEQA, an IS/MND is not required to provide detailed analysis of the proposed Project's impacts. We are not requesting the IS/MND include a detailed hydrology impact analysis, but rather we request the IS/MND provide additional information which explains generally how the Project design does not create off-site run-off. To that end, DWR requests the IS/MND provide additional information on the Project's proposed, approved drainage system design and other components of the Project's design capacity for surface water runoff. Based on the information provided in the IS/MND, DWR understands the 0.1-acre vegetation swale is the Project's detention basin. DWR requests the IS/MND provide additional information to confirm the purpose and to show the adequacy of the 0.1-acre vegetation swale to capture the Project's stormwater run-off, if it is indeed the Project's detention basin.

Further, DWR is concerned about the Project's potential impacts to the Oro Grande Wash. The Project may increase peak runoff rates and sedimentation impacts in Oro Grande Wash which may, either individually or cumulatively with other development projects, result in substantial erosion and siltation impacts at the Aqueduct's culvert at milepost 394. Any potential erosion and siltation impacts to the Aqueduct at milepost 394 caused by the Project may impact the functioning of the Aqueduct and SWP general operations. We request the IS/MND identify clearly any Project stormwater detention and drainage system which attenuate peak runoff rates and reduce/eliminate

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drainage and sedimentation impacts in Oro Grande Wash and explain briefly how that project feature attenuates peak runoff rates and reduces/eliminates drainage and sedimentation impacts. If the IS/MND relies upon information included in the September 11, 2019 Preliminary Hydrology Study prepared by Omnia Development Services for its finding of no impacts in section IX c, d and e, DWR requests that, at a minimum, a summary of that information be included in the IS/MND.

If you have any questions, please contact Scott Williams by electronic mail at scott.williams@water.ca.gov. Please provide DWR with a copy of any project documents when available by mail to:

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Sincerely,

Casey Pancaro
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