

DEPARTMENT OF WATER RESOURCES

1416 NINTH STREET, P.O. BOX 942836
SACRAMENTO, CA 94236-0001
(916) 653-5791



November 15, 2018

Ms. Megan Taggart, Senior Planner
City of Palmdale
383250 N. Sierra Highway
Palmdale, California 93550

RECEIVED

NOV 26 2018

PLANNING DIVISION

Dear Ms. Taggart:

SCH2018101045 Notice of Preparation for Quail Valley Planned Development
Environmental Impact Report, City of Palmdale, Los Angeles County

Thank you for the opportunity to review and comment on the Notice of Preparation (NOP) for the Quail Valley Planned Development Environmental Impact Report (EIR). The NOP describes the project as a 730-unit residential subdivision development comprising 600 net acres within an 878-acre gross area. The proposed project is located south of W. Avenue S and west of the California Aqueduct, part of the Department of Water Resources (DWR) State Water Project (SWP), within the City of Palmdale.

The NOP does not contain enough detail for DWR to comment specifically on the proposed development, however we can comment on foreseeable impacts to DWR right-of-way based on prior experiences with subdivision development upslope of SWP facilities. California Water Code Section 12899.6 prohibits damaging DWR right-of-way, or impeding DWR operations and maintenance activities, by changing the natural drainage patterns of watercourses that enter DWR right-of-way.

The proposed development is upslope of two DWR culverts that direct cross-drainage through the Aqueduct right-of-way at Mileposts 344.8 and 345.5. Stormwater runoff from the development has the potential to impact DWR right-of-way both upslope and downslope of the Aqueduct. DWR will need to review a stormwater management plan and hydrology report for the proposed development in order to make detailed comments on the development. In addition to developed stormwater, the EIR should address the potential for nuisance water flows which may be channeled through DWR right-of-way and cross-drainage facility. Due to increased operations and maintenance costs and difficulty of access to the right-of-way associated with stormwater and nuisance water discharge issues, DWR may require the Applicant to construct a trapezoidal channel from the Applicant's property boundary to the culvert inlet capable of directing discharge and supporting the weight and traffic of DWR maintenance and construction vehicles. Further, a surety bond may be required for a prescribed period to ensure that discharges into DWR right-of-way do not impact the right-of-way downslope of the culvert.

The DWR culvert at MP 344.8 will receive drainage from the majority of the proposed subdivision. Complicating matters within the drainage downstream of the development matters is the road culvert under W. Avenue S. This road culvert directs drainage from the south side of the road into an ephemeral drainage channel to the east of the drainage channel on which DWR constructed the Aqueduct culvert. The DWR culvert was designed with three box sections (two 6-foot by 6-foot box sections and a 7.5-foot by 6-foot box section) with a design maximum flow rate of 3140 cubic feet per second. The stormwater drainage from the project area shall not be directed to the toe of the Aqueduct embankment. The hydrologic analysis for the project shall address this issue and include a recommendation for directing this stormwater into the DWR culvert inlet. No longitudinal channeling of stormwater within DWR right-of-way will be approved as a conveyance to the culvert inlet.

The DWR culvert at MP 345.5 will potentially receive drainage from the northeast portion of the proposed subdivision. Based on Exhibit 3-2 of the NOP, Lot 70 within PA2 is located directly upslope of this DWR culvert. It is not clear from the exhibit if this lot will be dedicated as a stormwater detention basin, but construction of the development without storm water detention facilities upslope of SWP right-of-way is unacceptable to DWR. Discharge from the detention basin shall be routed in a channel entirely within the development property and shall enter DWR right-of-way perpendicular and in-line with the DWR culvert inlet. Discharge velocity from the detention basin shall be reduced by use of energy dissipaters (such as rock rip-rap) within the development prior to discharging into DWR right-of-way.

Any construction or work within DWR right of way will require an Encroachment Permit from DWR. Information and forms for submitting an application for an Encroachment Permit can be found at the following web address:

<https://water.ca.gov/Work-With-Us/Real-Estate/Encroachment-Permits>

Please provide DWR with a copy of any subsequent environmental documentation when it becomes available for public review. Any future correspondence relating to this project should be sent to:

Leroy Ellinghouse, Chief
SWP Right-of-Way Management Section
Division of Operations and Maintenance
Department of Water Resources
1416 Ninth Street, Room 641-1
Sacramento, California 95814

Ms. Megan Taggart, Senior Planner
November 15, 2018
Page 3

In addition, please continue to keep DWR informed of any future actions with respect to your project. If you have any questions, please contact Scott Williams of my staff at (916) 563-5746 or Leroy Ellinghouse at (916) 563-7168.

Sincerely,

A handwritten signature in blue ink, appearing to read "Dale Brown", with a stylized flourish at the end.

Dale Brown, Chief
Project Management Office
Division of Operations and Maintenance

cc: Sheree Edwards, 631-7
Gerry Snow, 604-8