

DEPARTMENT OF WATER RESOURCES

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1/7/2025

Brenda Magana
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RE: Quail Valley Project – Tentative Parcel Map 65813 and Planned Development18-001
Environmental Impact Report (EIR) SCH# 2024100065

Dear Ms. Magana:

The California Department of Water Resources (DWR) appreciated this opportunity to comment on the Quail Valley Planned Development Tentative Parcel Map 65813 and Planned Development18-001 project (Proposed Project) draft environmental impact report (DEIR) and has the following comments.

Background

The Proposed Project is a new development which includes 730 single-family residential lots, a 3.6-acre amenity center, a 23-acre greenbelt and trail system, and 395 acres of open space on vacant land. The Proposed Project is located adjacent to Avenue S and Tovey Avenue, approximately 1.2 miles west of State Route 14, and west of the California State Water Project aqueduct (CA Aqueduct) with portions of the Proposed Project adjacent to the CA Aqueduct. The highest elevation of the Proposed Project is almost 4,500 feet above mean sea level (msl) along the proposed open space at the southern edge of the Proposed Project site and drops to approximately 2,925 feet near the California Aqueduct, as shown on Exhibit 4.4- 2 (Topography Map).

Comments**General Comment**

DWR's comment letter to the 2018 Notice of Preparation (NOP) for the Proposed Project (Quail Valley Planned Development SCH# 201810104) explained that additional technical information was needed for DWR to evaluate the Proposed Project's potential impacts. Specifically, the comment letter requested the Proposed Project's stormwater management plan and hydrology report be made publicly available to evaluate various potential impacts. The DEIR does not provide access to the studies on which the impact determinations were made. Section 8 – References of the DEIR identifies reference sources for the DEIR but provides no links or other information as to where the references

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are available for review. As with the NOP, DWR is unable to complete a review of the DEIR and the impact conclusions due to the unavailability of the referenced material. These reference documents, particularly technical reports and information produced by consultants for this Proposed Project, such as the Stantec Consulting Services, Inc., or links to the documents need to be made available on the State Clearinghouse CEQAnet page.

Section 2.0 Project Description

Exhibit 2-1 – Regional Location Graphic appears to be a 2018 Google Earth satellite image which does not identify important regional features, such as highway 14. Please update the Regional Location graphic to a more recent Google Earth satellite image.

Section 4.10 Hydrology

Planning Area 2: The Proposed Project is upslope of two DWR culverts that re-direct stormwater runoff and drainage flows to a cross-drainage path through the CA Aqueduct right-of-way at Mileposts 344.8 and 345.5. The Proposed Project stormwater runoff and other drainage may result in significant erosion channeling and siltation impacts in DWR's right-of-way and at the CA Aqueduct, especially at Mileposts 344.8 and 345.5.

To support the conclusion of less than significant hydrology and water quality impacts, the DEIR needs to provide public access to any drainage design reports, supporting studies and other details upon which the DEIR relies for the impact conclusion, specifically for the project drainage and stormwater runoff and the proposed detention basin in Planning area 2. The DEIR must demonstrate that the proposed Planning Area 2 detention basin's design capacity is adequate to manage the Proposed Project drainage and stormwater runoff during periods of intense rain that will flow to the CA Aqueduct. The attachment SWP Cross Drainage East Branch Mile Post 303.9 to Mile Post 403.4 Hydrologic & Hydraulic Data Table B-5 (April 20, 1995) lists the structural capacities for each of these cross-drainage structures. The detention basin is proposed to be located immediately adjacent to the west boundary of DWR's right of way and east of DWR's cross drainage structure, a 6ft x 6ft Box Culvert at the Aqueduct's Mile Post 345.5 which conveys surface water runoff from the Proposed Project area under the California Aqueduct in an easterly direction.

The EIR needs to provide additional analysis which clarifies how the discharge from the Area 2 detention basin will be conveyed to DWR's box culvert cross drainage structure at MP345.5. Design details for the detention basin outlet and the conveyance structure from the outlet to DWR box culvert inlet are needed for a complete impact analysis. A design report for the basin needs to quantify design capacity of the detention basin for rainfall during a storm event and the quantity of stormwater runoff and Proposed Project drainage that will be routed to DWR Cross Drainage Structure MP345.5. See attachment titled

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SWP Cross Drainage East Branch Mile Post 303.9 to Mile Post 403.4 Hydrologic & Hydraulic Data Table B-5, dated April 20, 1995, for structural capacity of DWR cross drainage structure. MP345.5 cross drainage structure has a capacity of 910cfs.

The EIR needs to provide technical information which support the selecting of a detention basin rather than a retention basin to minimize runoff impacts in Planning Area 2. Considering that the basin is located immediately adjacent to CA Aqueduct right of way boundary, the Proposed Project needs to consider a retention basin alternative, which would be more effective at minimizing runoff impacts after high intensity rainfall events than a detention basin due to a retention basin's ability to hold drainage water and most stormwater runoff while percolation and infiltration within the basin itself discharges the majority of the water within the Proposed Project area. The retention basin process would reduce greatly the amount, frequency and intensity of excess water released during a higher intensity rainfall event from Planning Area 2 through an overflow structure towards DWR's MP345.5 Box Culvert. The reduced intensity of the flows would minimize the potential erosion, scour and siltation damage to the box culvert inlet and outlet and at other areas both within DWR's right-of-way and outside of DWR's right-of-way on the outlet side. In addition, a retention basin's ability to reduce the Proposed Project runoff in Planning Area 2 would minimize greatly flows that would be released and routed as overflow to DWR MP345.5 Box Culvert.

While the DEIR explains Planning Area 2 drainage would be conveyed under the CA Aqueduct via an existing storm drain, presumably DWR cross drainage structure MP345.5, the DEIR includes no details on the detention basin outlet and how the detention basin would discharge into DWR's cross drainage structure MP345.5. Any basin (detention or retention) discharging towards DWR right of way needs to be properly routed to the nearby cross drainage structure through lined channel.

Planning Area 2: Page 4.10-32 of DEIR states "...*Planning Area 2. This drainage will be conveyed under the aqueduct via an existing storm drain line. The three five-acre rural lots located in Planning Area 10 in the southeast corner of the Project site will not significantly alter existing drainage in this area. These lots are sufficiently large to accommodate drainage changes within each individual lot*". The EIR needs to identify the existing storm drain line which is referenced in this statement add details to the EIR showing how the drainage will be conveyed to DWR Cross Drainage Structure MP345.5 and update any associated impact analysis as needed. If the existing storm drain is inadequate for the Proposed Project requirements, the EIR needs to provide design details and potential impacts of the drainage with a lined channel connection to the cross-drainage structure.

Planning Area 2: Page 4.10-34 of the DEIR states "*flows leaving the basins to existing downstream drainage infrastructure will be reduced in comparison to the predevelopment flow condition. Therefore, the volume of runoff would not exceed the capacities of existing*

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or Project stormwater drainage systems. All runoff would be accommodated adequately and no flooding would occur on- or off-site". Clarify how the drainage from the easterly detention basin located in Planning Area 2 would adequately drain into DWR cross drainage structure MP345.5 and not cause flooding or erosion inside DWR right of way. Concrete lined channel is required from proposed basin outlet up to the inlet of DWR box culvert.

Planning Area 1 and 2: Per CA Code of Regulations §612.5(b) *"The permittee shall not divert surface run off toward the Department's open canal embankments. The surface run off shall be stored and collected outside the Department's right-of-way. Lined drainage channels shall be designed to transfer flow from the collection basins to the Department's existing cross drainage facilities and cross as close as practical to a ninety (90) degree crossing".* Any drainage runoff directed towards DWR right of way shall be analyzed to verify if any drainage improvements are required within DWR right of way or up to DWR Cross Drainage Structures to properly direct drainage through the existing culverts to northeast side of CA Aqueduct. This requirement may apply to the detention basin at Planning Area 2 discharges which would flow to MP345.5 cross drainage structure and at Planning Area 1 discharges which would flow to MP344.8 cross drainage structure.

Planning Area 2: Draft EIR Section 4.1 Exhibits 4.1-2 and 4.1-3 are missing Section I details included in the Section Key Map. The Section I detail, which shows the cross section for DWR right of way west boundary near Planning Area 2 needs to be added to exhibits 4.1-2 and 4.1-3.

Existing Infrastructure

There is an existing Access Road along DWR right of way south boundary near the easterly detention basin in Planning Area 2. See Frontage Access Road limits on DWR As-built Drawing No. N-27C1-5. Information is needed to demonstrate that the Proposed Project's changes to existing drainage patterns in this area will not impact this road or that mitigation measures are provided for any impacts.

There is an existing Drainage Ditch along the south side of the CA Aqueduct extending north and south sides of Avenue S along the CA Aqueduct that conveys drainage into DWR Cross Drainage Structures at MP 344.8 and MP 345.5. See attached DWR As-built Drawing No. N-27C1-3, N-27C1-4, N-27C1-5 and N-27C7-1. Clarify if any drainage from Proposed Project site would be directed to this drainage ditch.

Pre and Post Development Flows

Provide a Hydrology/Drainage impact analysis which identify the pre- and post-development runoff volumes and whether existing and planned stormwater drainage systems have adequate capacity to accommodate such volumes. The Hydrology/Drainage

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analysis needs to include the pre and post project flows into the DWR Cross Drainage Structures MP345.5 adjacent to Planning Area 2 and MP344.8 Box Culvert located north of Avenue S downstream of proposed detention basin located adjacent to Avenue S in Planning Area 1. If the study indicates uncontrolled runoff directed towards DWR right of way causing ponding, erosion and scour, this information and any needed mitigation needs to be included in the EIR. The EIR needs to include a hydrology map for this area showing pre and post development flows.

Hydrology of Existing Riverine Systems

Based off the U.S. Fish and Wildlife Service National Wetlands Inventory Map (see attachment) there are two riverine systems or streams classified as R4SBC and one of these runs through the center of proposed development from south to north across Avenue S flowing into DWR MP344.8 Box Culvert to the northeast side of CA Aqueduct and into Anaverde Creek. This Draft EIR's section 4.4.5 Biogeography, Corridors, Significant Ecological Areas and Wildlife explains that drainage can be incidental movement areas for small animals during periods of intense rain, and there is one primary drainage on-site that engineering calculations indicate that the property could generate substantial surface flow during higher intensity rainfall events, and that sudden, intense flows

- a. How will the flows from this riverine or stream be impacted by the proposed development? The DEIR currently does not mention any of these existing riverine systems near the proposed development. How will the flows through these streams be maintained and routed during the construction phase? DWR is concerned that any rerouting of these streams may impact DWR's right of way, including potential for erosion and scour or damage to the inlets for DWR Box Culverts. Please include an analysis of these flows in this chapter.
- b. How does the final design for proposed development incorporate these existing riverine systems into the proposed on-site drainage system? Are they accepted into the proposed development and collected into the proposed detention basins or rerouted around the development? Hydrology report is needed to assess and analyze the impacts to the drainage in this area.

Temporary Water Pollution Control Plan

Provide Temporary Water Pollution Control Plan. Erosion Control measures are needed to protect DWR right of way, drainage ditch, and cross drainage structures during construction runoff to prevent any water ponding within DWR right of way during the initial grading phase for proposed development which may block or alter existing drainage

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patterns in the area which may result in water ponding within DWR right of way. Additional measures are needed to protect DWR right of way from erosion, scour and ponding during construction.

Bridge Rating

It is unclear if the existing Avenue S bridge over CA Aqueduct Mile Post 345.25 will be used for construction access for the proposed development. This bridge is owned by City of Palmdale. As a courtesy, we would like to inform you that the bridge is rated for HS-20 live loading.

Safety Element

Goal; SE-4: Minimize Impacts to Public Safety and/or Property as a Result of Flooding. The north-east portion of this development borders up to the DWR California Aqueduct. Due to concerns with public safety, security, and to prevent unauthorized access onto DWR property, please install a no-climb fence along the development boundary limits adjacent to the existing DWR fence. Also provide details showing what the fence alignment will look like near the proposed detention basin at Planning Area 2.

Existing Easements

DEIR Appendix B Exhibit 2-3 Composite Map of Existing Easement: please include and identify DWR right of way on this exhibit.

Encroachment Permit

An encroachment permit from DWR is required when a project impacts DWR property rights pursuant to CA Code of Regulations §605(f). It is likely the Proposed Project will need an encroachment permit due to the drainage impact to DWR cross drainage structures from proposed detention basin located at Planning Area 2 and possibly the drainage from detention basin located at Planning Area 1. DWR's Real Estate Branch will be sending information on the DWR encroachment permit process.

If you have any questions or need additional information, please contact me at (916) 820-8124 or via email at Nancy.Finch@water.ca.gov.

Sincerely,

Nancy E Finch

Nancy Finch
Attorney III