

**DEPARTMENT OF WATER RESOURCES**

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July 16, 2021

Mr. Ryan Leonard  
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Governor's Office of Planning & Research

**July 19 2021**

**STATE CLEARINGHOUSE**

SCH# 2021060397, Notice of Preparation/Initial Study (NOP/IS) for the Industrial Park Project City of Hesperia, San Bernardino County

Dear Mr. Leonard:

The California Department of Water Resources (DWR) Division of Operations and Maintenance (O&M) staff has reviewed the City of Hesperia's (City) Initial Study for the proposed I-15 Industrial Park Project and has the following comments.

**Project Description**

The proposed is an industrial/warehouse campus consisting of two building totaling 1,850,000 square-foot (Building 1: 1,108,000 sq-ft, Building 2: 742,000 sq-ft) on approximately 98 acres in two sites located approximately 0.25 mile apart on the east mesa of Oro Grande Wash (Wash) and connected by Sultana Street. The proposed project is located upslope of the East Branch of the California Aqueduct, part of the State Water Project.

**Specific Comments****2.2 Environmental Setting****Surrounding Land Uses**

This section describes the surrounding land uses as vacant land, scattered residential, commercial, light industrial and utility uses. The land uses to the north include vacant land and scattered commercial, light industrial, and residential uses. The land uses to the east are described as commercial uses and I-5. The State Water Project's California Aqueduct (Aqueduct) is a significant land use to the north and northeast of the project. The Aqueduct intersects I-15 in an area northeast of the project. It is important to include the Aqueduct in the description of surrounding land uses so the lead agency is able to reach factual conclusions based on substantial evidence of all surrounding land uses.

DWR requests that the Aqueduct is added to the surrounding land use description section.

**2.3 Project Characteristics**

## Utility Improvements

The initial study explains the project's stormwater would be managed on site using at-grade detention basins and subsurface catch basins to capture and treat on-site stormwater. DWR requests the Draft EIR explain whether the project's stormwater management system improvements would have the capacity for on-site infiltration of all project stormwater.

## 3.7 Geology and Soils

The initial study explains that the pervious areas of the project site would be landscapes that would help retain on-site soils and prevent erosion, resulting in operational impact related to soil erosion that would be less than significant, with no further analysis required.

The geology and soils discussion in the initial study does not explain how the project's on-site stormwater at-grade detention basins and subsurface catch basins would result in no significant impacts related to soil erosion. We request this analysis be conducted in the Draft EIR.

The initial study does not analyze the potential off-site erosion resulting from off-site stormwater flows that may occur in either normal stormwater system operations or in the event the on-site stormwater system is overwhelmed. We request the Draft EIR include an analysis of the potential impacts of off-site erosion, especially at the Oro Grande Wash below the Cataba collector pipeline discharge location at the concrete apron on the open mesa.

## 3.10 Hydrology and Water Quality

The initial study explains the project's stormwater would be managed on site using at-grade detention basins and subsurface catch basins to capture and treat on-site stormwater. In addition, the project's potentially significant impacts on existing drainage patterns and local hydrology will be analyzed in the Draft EIR.

The initial study does not adequately analyze project drainage. There is no information regarding the amount of surface water runoff from the proposed 98 acres of the I-15 Industrial Park Project will drain to the Cataba Road stormwater pipeline. It appears that the approximately 65-acre eastern parcel(s) may be connected to the pipeline. DWR requests the Draft EIR includes in its drainage patterns and local hydrology analysis the potential significant impacts to the drainage patterns and local hydrology through the wash, including:

- the conditions under which any projected amount of stormwater releases could drain into the Cataba Road stormwater pipeline from this 98-acre project;
- whether any portion of the project would be connected to the Cataba stormwater pipeline, especially the approximately 65-acre eastern parcel(s).
- an analysis explaining how the project's storm water detention plans would be consistent with the City of Hesperia's Master Plan of Drainage for this area;
- whether any project runoff would contribute to stormwater flows with the energy/velocity dissipation for the flows to be directed down into the Wash channel based on the 70+ feet of

elevation loss between the ground level on the east mesa of the Wash and the bottom of the Wash channel;

-whether any project runoff would enter the DWR maintained cross-drainage culvert at Milepost 394.5. This culvert conveys all stormwater flows in the Wash channel through a fill section of the Aqueduct embankment and eventually to the Mojave River.

### 3.19 Utilities and Service Systems

DWR requests an analysis of the potentially significant impacts of project runoff to the storm water drainage system in the project area, including impacts to the following facilities:

- the City of Hesperia's Cataba Road stormwater pipeline, which is the primary stormwater management feature for commercial and residential development of the east mesa portion of the Wash bounded by Highway 395 to the west, Interstate 15 to the south and east, the Aqueduct to the north and the centerline of the Wash to the northwest;
- the existing 66-inch diameter Cataba Road stormwater collector;
- the Cataba collector pipeline discharge, a concrete apron on the open mesa. Stormwater from commercial and residential projects located on the east mesa is directed down into the Wash via approximately 290 feet south of the DWR right-of-way boundary;
- the erosion associated with the Cataba collector discharge (photos attached); and
- DWR's cross-drainage culvert at Milepost 394.5 that conveys all stormwater flows in the Wash channel through a fill section of the Aqueduct embankment and eventually to the Mojave River.

### 3.21 Mandatory Findings of Significance

DWR requests the Draft EIR includes a thorough discussion of the following.

#### Cumulative Impacts to Geology and Soils

The cumulative erosion and sedimentation impacts are a result of developments in the Project area which directs stormwater runoff into the Cataba Road stormwater pipeline which discharges into the Oro Grande Wash. DWR requests the Draft EIR analyze these cumulative impacts and provide a hydrologic analysis of existing and new stormwater runoff calculations in the analysis.

The potentially significant cumulative erosion impacts are a result of the Cataba Road stormwater pipeline system discharges into the Wash. The discharged water erodes the soil in the Wash and then deposits the resulting sediment eroded by the system into down flow areas of the Wash, DWR's right of way, and DWR's cross-drainage culvert at Milepost 394.5. The impacts include potentially significant and dangerous erosion to the Wash and increasing sediment deposits at the DWR facilities which could compromise the structural integrity of the Aqueduct if not removed.

It is critical to analyze and mitigate the potentially significant cumulative erosion impact described above, because of the potential catastrophic direct and/or indirect erosion damage impacts, especially at the culvert inlet, if the pipeline discharges would increase unabated.

The potential significant impact of the cumulative sedimentation deposits at the culvert inlet, especially unexpected significant deposits in a short period of time, would require emergency actions by DWR to prevent catastrophic damage to the Aqueduct.

To ensure that these potentially significant cumulative impacts to these resources are fully analyzed, the following information should be included in the analysis:

- The City of Hesperia installed the 66-inch diameter Cataba Road stormwater pipeline was developed to be the primary stormwater management feature for commercial and residential development where the project would be located (within the east mesa portion of the Wash bounded by Highway 395 to the west, Interstate 15 to the south and east, the Aqueduct to the north and the centerline of the Wash to the northwest). The Cataba collector pipeline carries the stormwater away from the developed area and discharges the water at a concrete apron on the open mesa approximately 290 feet south of the DWR right-of-way boundary.
- The cumulative impact to drainage patterns and erosion resulting from the additional flows of this project and from the approximately 120 additional acres of impermeable-surface commercial and residential construction development in the mesa since the Cataba Road stormwater pipeline was installed. While cumulative impacts may be mitigated by previous projects' on-site stormwater facilities, DWR does not have documented evidence of such mitigation.
- Currently, stormwater is discharged from the Cataba Road stormwater pipeline into the Wash without attenuation, resulting in severe erosion downslope of the pipeline's discharge apron (see Photographs below). The material scoured by these erosive flows is deposited immediately upslope of DWR's culvert. In one severe storm event this sediment deposition was substantial enough to block the culvert completely. The Draft EIR needs to analyze the cumulative impacts of current and project sediment deposition.
- DWR has advised the City informally that any future development in the watershed served by the stormwater system must address the cumulative impact of erosion caused by stormwater discharges from the existing development along with the additional flows from a new project in the stormwater system. DWR requests that erosion cumulative erosion impacts are analyzed in the Draft EIR.

#### Cumulative Impacts to Utilities and Service Systems

The project would increase the Cataba Road stormwater pipeline system's discharge into the Wash, which could be a potentially significant cumulative impact to the function of the stormwater discharge system. DWR requests a discussion of the impacts to the whole stormwater system, including the cumulative impacts of the energy/velocity dissipation for the flows to be directed down into the Wash channel based on the 70+ feet of elevation loss between the ground level on the east mesa of the Wash and the bottom of the Wash channel.

#### Substantial Adverse Effects on Human Beings.

While the City requires the section of the Oro Grande Wash below the Cataba Road collector pipeline discharge location to maintain its function as drainage channels, the open space characteristic of the drainage channel attracts people to the area as a recreational area and a

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dump site. DWR staff frequents the area for SWP operational and maintenance activities. The erosion that is a result of the Cataba Road pipeline into the Wash's drainage channel has resulted in a 70+ feet of elevation loss between the ground level on the east mesa of the Wash (where Cataba Road ends) and the bottom of the wash channel.

This drop in elevation is a safety issue for humans. The erosion pattern has created an open deep ravine with inadequate warnings as to the danger, especially people driving down Cataba Road who could become disoriented and inadvertently drive into the ravine. DWR requests the Draft EIR analyze the potentially substantial adverse safety effects of inadequate notice of the dangerous conditions of the Wash at the Cataba Road discharge location.

If you have any questions or need additional information, please contact Scott Williams at (916) 653-5746 or [Scott.Williams@water.ca.gov](mailto:Scott.Williams@water.ca.gov).

Sincerely,

*Nancy Finch*

Nancy Finch  
Attorney

Attachments:

Photo 1. Erosion immediately downslope of Cataba Road storm drain concrete discharge apron.

Photo 2. Erosion channel scoured downslope of Cataba Road storm drain with Aqueduct embankment in background.



Attachment 1. Erosion immediately downslope of Cataba Road storm drain concrete discharge apron.



Attachment 2. Erosion channel scoured downslope of Cataba Road storm drain with the Aqueduct embankment in the background.