

Responses to Comments

This document includes comments received during the circulation of the Draft Initial Study – Mitigated Negative Declaration (IS-MND) prepared for the 2600 Moraga Road Self Storage Project (Project), and responses to those comments relevant to the environmental analysis.

The Draft IS-MND was circulated for a public review period that began on March 25, 2021 and ended on April 14, 2021, for a total public review period of 20 days. In accordance with the California Environmental Quality Act (CEQA) Guidelines Section 15074 (b), the City of San Pablo’s decision makers must consider the IS-MND together with comments received during the public review process prior to approving the project. The City of San Pablo received two individual comment letters during the public review period. The commenters and the dates the comments were received are listed in the table below.

Letter No. and Commenter	Date received
1 Contra Costa Flood Control and Water Conservation District	April 7, 2021
2 West County Wastewater	April 13, 2021

The responses to these comments received during the public comment period follow. Responses to comments received that are relevant to the CEQA process or the analysis and conclusions presented in the IS-MND have been summarized by environmental resource area.

Other comments not relevant to the CEQA process or environmental analysis are responded to as appropriate.

Hydrology and Water Quality

Response HYDRO-1

The Contra Costa County Flood Control and Water Conservation District (FC District) states that the nearest watercourse to the project site is Rheem Creek, and that the creek should be identified in the document.

In response to this comment, the following revisions have been made to page 68 of the IS-MND:

Compliance with the SWRCB's NPDES Construction General Permit, NPDES MS4 Permit, and SPMC Chapter 8.40 which regulates stormwater and discharge within the city would reduce the risk of short-term erosion and increased runoff resulting from drainage alterations during construction. Rheem Creek located approximately 500 feet north of the project's northern boundary, and San Pablo Creek, located approximately 0.3 mile south of the project boundary, are the nearest watercourses to the site and do not flow through or adjacent to the site. Project construction would not alter the course of the creeks or other stream or river as there are no other surface water features identified in the project vicinity. Therefore, impacts would be less than significant.

Response HYDRO-2

The FC District states that it does not recommend the use of bioretention areas (C.3 facilities) sized to meet Contra Costa Clean Water Program C.3 requirements for mitigating peak flows, and recommends analyzing C.3 facilities in a way that ignores the above surface storage volume required by the C.3 facilities sizing criteria. The FC District recommends that the City condition the developer to submit a hydrograph analysis produced by or accepted by the FC District.

The applicant will provide updated project plans and hydrology and hydraulic calculations to the FC District for approval prior to project approval.

Response HYDRO-3

The FC District recommends the addition of mitigation which would require the City to condition the developer to design and construct storm drain facilities to adequately collect and convey stormwater entering or originating within the development to the nearest adequate man-made drainage facility or natural watercourse, without diversion of the watershed.

The applicant has designed the storm water system to release at the pre-development rate. Hydrology and hydraulic calculations and plans would be submitted to the FC District for approval prior to project approval.

Response HYDRO-4

The FC District recommends the developer be required to submit hydrology and hydraulic calculations to the City that prove the adequacy of the on-site drainage system and the downstream drainage system.

The applicant has submitted hydrology and hydraulic calculations and plans to the City for review.

Response HYDRO-5

The FC District states that they do not have maintenance funding for Drainage Area 127 facilities. The FC District recommends that the City ensure that a perpetual funding source is in place for maintenance of the drainage facilities serving the project.

Maintenance of on-site facilities will be required as a condition of approval for the proposed project. The City of San Pablo will also work with the Flood Control District to investigate appropriate approaches to providing for future maintenance of drainage facilities in this area.

Response HYDRO-6

West County Wastewater states that wastewater service is available for the proposed development, subject to the submission and compliance with the following items:

- 1. Provision of a plot plan, to scale, showing the following information*
 - a. Assessor's Parcel Number(s)*
 - b. Easements, if applicable*
 - c. Location(s) of the residence(s) in relation to the parcels*
 - d. Location(s) of the parcel(s) in relation to the street(s)*
 - e. Location(s) of the sewer lateral(s) and connection(s) to the sewer main(s)*
 - f. Location(s) of the rooms in relation to the house(s)*
 - g. North arrow*
 - h. Sidewalk(s)*
 - i. Street name(s)*
- 2. The plot plan must be reviewed and approved by West County Wastewater*
- 3. A fee estimate should be prepared and collected by West County Wastewater*

As of the date of West County Wastewater's comment letter, the applicant has submitted a plot plan with required information to West County Wastewater. A fee estimate will be prepared and collected by West County Wastewater after plot plan review has been completed.

Comment Letters

Leslie Trejo

From: Leslie Trejo
Sent: Thursday, April 15, 2021 3:37 PM
To: Leslie Trejo
Subject: FW: [EXT] FW: Mitigated Negative Declaration for 2600 Moraga Rd Self Storage

Importance: High

From: Joe Smithonic <Joe.Smithonic@pw.cccounty.us>
Sent: Wednesday, April 7, 2021 4:48 PM
To: sandram@sanpabloca.gov
Cc: Michelle Cordis <michelle.cordis@pw.cccounty.us>; larry@arecess.com; Bill Henn <BHenn@hohbach-lewin.com>
Subject: Mitigated Negative Declaration for 2600 Moraga Rd Self Storage

Hello Ms. Marquez,

The Contra Costa County Flood Control and Water Conservation District (FC District) has reviewed the Initial Study and Mitigated Negative Declaration (ISMND) prepared by Rincon Consultants, Inc. for the Self-Storage Project located at 2600 Moraga Road (APN 416-140-050) in the City of San Pablo (City). We submit the following comments:

1. Page 68 of the ISMND states that “San Pablo Creek, located approximately 0.3 mile south of the project boundary, is the nearest watercourse to the site,” but the nearest watercourse to the project appears to be Rheem Creek, which is within 500 feet of the project’s northern boundary. Rheem Creek should be identified in the ISMND as a nearby watercourse.
2. Page 69 of the ISMND states that since the project is required to comply with various clean water permits and regulations, the project would not result in a substantial increase of stormwater discharge nor exceed the on- or off-site stormwater drainage systems. The FC District does not recommend the use of bioretention areas (C.3 facilities) sized to meet Contra Costa Clean Water Program C.3 requirements for mitigating peak flows. These C.3 Facilities have not been proven to perform as peak flow mitigation measures under design storm flow conditions for the 10-year storm and above. They do not account for the saturated condition of soils that could precede a 10-year design storm. They have not been in use long enough to provide operational experience that they will continue to perform as designed and be maintained properly. C.3 facilities that are proposed to be used to mitigate peak flows should be analyzed in a way that ignores the above surface storage volume required by the C.3 facilities sizing criteria. Further, we recommend that C.3 facilities be analyzed using a hydrograph produced by or accepted by the FC District.
3. Furthermore, the project adds approximately 100,000 square feet of impervious surfaces compared to existing conditions and the ISMND does not provide any evidence to support the statements regarding the adequacy of the existing downstream stormwater drainage systems serving the project. We recommend that as a mitigation measure, the City condition the developer to design and construct storm drain facilities to adequately collect and convey stormwater entering or originating within the development to the nearest adequate man-made drainage facility or natural watercourse, without diversion of the watershed.

4. In addition, the developer should be required to submit hydrology and hydraulic calculations to the City that prove the adequacy of the on-site drainage system and the downstream drainage system. We defer review of the local drainage to the City. However, the FC District is available to provide technical review under our Fee-for-Service program.
5. The FC District has no maintenance funding for Drainage Area 127 facilities. The City should ensure that a perpetual funding source is in place for maintenance of the drainage facilities serving the project.

We appreciate the opportunity to comment on the ISMND for the 2600 Moraga Road Self-Storage Project and welcome continued coordination with the City of San Pablo. If you have any questions, please contact me at your earliest convenience.

Thank you,

Joe Smithonic | Staff Engineer

Contra Costa County Public Works: Flood Control & Water Conservation District

255 Glacier Drive, Martinez, CA 94553-4825

P: 925.313.2348 | E: Joe.Smithonic@pw.cccounty.us



April 13, 2021

Sandra Marquez, Associate Planner
City of San Pablo
Community Development Office
1000 Gateway Avenue
San Pablo, CA 94806

Subject: 2600 Moraga Road, San Pablo, CA 94806
APN: 416-140-050

Dear Sandra Marquez,

West County Wastewater (WCW) appreciates this opportunity to comment on the City of San Pablo's Initial Study and Mitigated Negative Declaration (IS/MND) for proposed work to be located at 2600 Moraga Avenue, in San Pablo, California. The applicant is requesting approval to construct a 124,620 sq. ft. self-storage facility comprised of personal storage units and a rental office within three single-story structures and one three-story structure. The three-story structure would have a maximum height of 24 feet. Parking would include 16 on-site parking spaces and three bicycle parking spaces. The storage facility would be constructed on a 4.1-acre parcel (approximate size) that would be created as part of a lot split.

Wastewater service is available for this proposed development, subject to the Project Sponsor submitting and complying with the following:

1. Provide a plot plan, to scale, showing the following information (**completed**):
 - a. Assessor's Parcel Number(s) (APNs)
 - b. Easement(s), if applicable
 - c. Location(s) of the residence(s) in relation to the parcels
 - d. Location(s) of the parcel(s) in relation to the street(s)
 - e. Location(s) of the sewer lateral(s) and connection(s) to the sewer main(s) --
 - f. Location(s) of the rooms in relation to the house(s)
 - g. North arrow
 - h. Sidewalk(s)
 - i. Street name(s)

2. The plot plan must be reviewed and approved by WCW. Contact WCW staff regarding approval of the plot plan (**in progress**).
3. A fee estimate will be prepared upon the submission of plans meeting the criteria in item #1 (above - **complete**). Please see the attachment for a preview of the fees. It is important to note that the schedule of user fees is only valid from 07/01/2020 to 06/30/2021.

If you have any questions, please contact me at (510) 680-0913.

Sincerely,

Armondo Hodge

Armondo Hodge

Phone: (510) 680-0913

Email: ahodge@wcwd.org

Attachment(s): WCW Schedule of Fees (07-01-20 to 06-30-21)

WEST COUNTY WASTEWATER DISTRICT
Schedule of User Fees (Effective July 1, 2020)

ENVIRONMENTAL QUALITY (SEWER USE) RATES

USER TYPE

A.	SINGLE FAMILY RESIDENTIAL	
	1 Flat rate	639.00
	2 Min Charge	n/a
	3 Flow Charge	n/a
	4 BOD Charge	n/a
	5 SS Charge	n/a
B.	MULTI- FAMILY RESIDENTIAL	
	1 Flat rate	557.00
	2 Min Charge	n/a
	3 Flow Charge	n/a
	4 BOD Charge	n/a
	5 SS Charge	n/a
C.	MOBILE HOME RESIDENTIAL	
	1 Flat rate	557.00
	2 Min Charge	n/a
	3 Flow Charge	n/a
	4 BOD Charge	n/a
	5 SS Charge	n/a
D.	COMM. DOMESTIC STRENGTH	
	1 Flat rate	n/a
	2 Min Charge	639.00
	3 Flow Charge	6.84
	4 BOD Charge	n/a
	5 SS Charge	n/a
E.	COMM. HIGH STRENGTH	
	1 Flat rate	n/a
	2 Min Charge	639.00
	3 Flow Charge	11.52
	4 BOD Charge	n/a
	5 SS Charge	n/a
F.	INDUSTRIAL	
	1 Flat rate	n/a
	2 Min Charge	639.00
	3 Flow Charge	4.40
	4 BOD Charge	0.45
	5 SS Charge	0.54

WEST COUNTY WASTEWATER DISTRICT
Schedule of User Fees (Effective July 1, 2020)

ANNEXATION FEES

Annexation Fees	2,592.00
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PLAN APPROVAL AND SEWER PERMITS- BUILDING CONSTRUCTION

USER TYPE

A.	SINGLE FAMILY	
	1 Plan Approval (per bldg.)	197.00
	2 Permit	395.00
B.	MULTIPLE FAMILY DWELLINGS, TRAILER COURTS, GUEST DWELLINGS OR CONDOMINIUMS	
	1 Plan Approval (per bldg.)	229.00
	2 Permit (per bldg. Sewer)	427.00
C.	SCHOOL BUILDINGS OR CHURCHES	
	1 Plan Approval	229.00
	2 Permit	427.00
D.	COMMERCIAL INSTALLATIONS	
	1 Plan Approval	1,028.00
	2 Permit	658.00
E.	INDUSTRIAL INSTALLATIONS	
1	Contributing Domestic Flow Only	
	a Plan Approval	797.00
	b Permit	331.00
2	Contributing Industrial Waste (Ordinance 1-12-71A, Sec. 5)	
	a Plan Approval	731.00
	b Permit	2,931.00
F.	MISCELLANEOUS INSTALLATIONS	
	1 Plan Approval	99.00
	2 Permit	419.00
G.	MINOR REPAIRS, ALTERATIONS AND DEMOLITION	
	1 Plan Approval	164.00
	2 Permit	295.00

WEST COUNTY WASTEWATER DISTRICT
Schedule of User Fees (Effective July 1, 2020)

TENTATIVE MAP REVIEW

Number of Proposed Lots in Subdivision

1	20 lots and Under	3,589.00
2	21 + lots	3,855.00

SEWER MAIN CONSTRUCTION PERMIT FEES

Permit - District		
1	Maintained (per 1,500 l.f. or fraction thereof)	11,492.00
Permit - Privately		
2	Maintained (per 1,000 l.f. or fraction thereof)	7,196.00
3	Per Manhole (applies to all SME projects)	331.00

CONNECTION FEE

USER TYPE

1	Single Family	9,756.00
2	Multi Family	7,000.00
3	Commercial Domestic Strength	Varies by service unit
4	Commercial Non-Domestic Strength	Varies by service unit

FLOW ZONE CHARGE

Zone

1	441.00
2	1,094.00
3	1,534.00
4A	1,534.00
4B	1,318.00
5	3,506.00
6	441.00
7-13	
14	1,094.00
15	877.00
16	441.00
17	1,318.00
18A	441.00
18B	3,506.00

WEST COUNTY WASTEWATER DISTRICT
Schedule of User Fees (Effective July 1, 2020)

DENSITY CHARGES

Dwelling Units/Acre

1-12	
13-20	122.00
21-30	245.00
31-40	367.00
41-50	490.00
51-60	613.00
61-70	735.00
71-80	858.00
81-90	981.00
91-100	1,103.00
101+	1,226.00

ENVIRONMENTAL COMPLIANCE INSPECTIONS

Business Type

1 Food Service Establishment Inspection	316.00
2 Dental Facility Inspection	316.00
3 Permitted Industrial User - Inspection	625.00
4 Permitted Industrial User - Sampling	1,259.00
5 Auto Service Facility Sampling	467.00

The fee for construction re-inspection, non-compliance re-inspection or sampling shall be at the appropriate fee category listed above.

TEMPORARY DISCHARGE PERMIT

Temporary Discharge Permit	547.00
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OTHER FEES

1 Dishonored Check Fee	10.00
2 Collection Fee	See Note

Note: The Collection Fee is the District's actual cost to collect delinquent charges. The fee may include collection agency fees, applicable County charges, legal fees, and court costs.

WEST COUNTY WASTEWATER DISTRICT
Schedule of User Fees (Effective July 1, 2020)

The District shall refund services fees to the person requesting the services only upon proof that the requested service was not performed. If any portion of the requested services is performed, then no portion of the fee shall be refunded. Connection fees shall be refunded to the owner of the property for which the connection was requested upon proof that the connection was not completed.

AUTHORITY: WEST COUNTY WASTEWATER DISTRICT CODE CHAPTER 8.20.030