



# California Regional Water Quality Control Board

## Santa Ana Region

3737 Main Street, Suite 500, Riverside, California 92501-3348  
Phone (951) 782-4130 • FAX (951) 781-6288 • TDD (951) 782-3221  
[www.waterboards.ca.gov/santaana](http://www.waterboards.ca.gov/santaana)



Linda S. Adams  
Secretary for  
Environmental Protection

Arnold Schwarzenegger  
Governor

December 12, 2008

RECEIVED  
DEC 16 2008

RIVERSIDE COUNTY  
TRANSPORTATION COMMISSION

Cathy Bechtel, Project Development Director  
Riverside County Transportation Commission  
4080 Lemon Street, 3<sup>rd</sup> Floor  
Riverside, CA 92501

### DRAFT ENVIRONMENTAL IMPACT REPORT/ ENVIRONMENTAL IMPACT STATEMENT, RIVERSIDE COUNTY TRANSPORTATION COMMISSION, MID-COUNTY PARKWAY, SCH# 2004111103

Dear Ms. Bechtel:

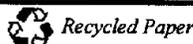
Regional Board (RWQCB) staff have reviewed the Draft Environmental Impact Report/ Draft Environmental Impact Statement (DEIR/DEIS) for the proposed Mid-County Parkway (MCP; Project), a multi-lane regional highway with undetermined exits that will extend from San Jacinto to Interstate 15 (I-15) south of Corona.

The Preferred Alternative is the southernmost route, "Alternative 9 with the Temescal Wash Design Variation (9 TWS DV)," which recognizes direct impacts to 10.1 acres of waters of the U.S. (Table 3.18.C), jurisdictional to the U.S. Army Corps of Engineers (Corps) and our office (Clean Water Act Sections 404/401). The Project area (all alternatives) encompasses a total of 112.65 acres of Corps-jurisdictional area and 257.5 acres of California Department of Fish and Game jurisdictional area. At our meeting with you planned for December 16, 2008, we would like to discuss appropriate mitigation for proposed impacts of the MCP project to waters of both the U.S. and state.

We request that the EIR/EIS (Response to Comments) incorporate discussion of the following comments, in order for the Project to best protect water quality standards (water quality objectives and beneficial uses) identified in the Water Quality Control Plan for the Santa Ana River Basin, 1995, as amended (Region 8 Basin Plan):

1. The DEIR/DEIS (p. 3.18-2) should clarify that surface waters outside of federal jurisdiction ("isolated waters") are nevertheless waters of the State and may be subject to individual waste discharge requirements issued by the Regional Board, pursuant to the Porter-Cologne Water Quality Control Act. Large-scale maps of all portions of the proposed route should indicate all jurisdictional and non-jurisdictional water bodies identified.
2. The discussions of cumulative and growth-inducing impacts (DEIR/DEIS p. 4-14; Section 3.25) indicate that the presence of the MCP will have little influence on the construction of new developments along the route, population increase, rate of growth, etc. Instead, we believe that the DEIR/DEIS should reflect that almost all

*California Environmental Protection Agency*



major roads do engender growth and the development of the properties along them (perhaps with the exception of a minimum-exit tollroad). The accessible regional network that the MCP will help create will likely cause, or at the very least contribute to, increased traffic in the long term, with additional attendant increase in the loading of pollutants of concern in stormwater runoff from the proposed projects' facilities.

We request that the DEIR/DEIS mention related projects at various levels of likelihood, including the Corona Foothill Parkway, the East Corona Corridor, and all existing and potential developments related to the MCP segment extending west of the MCP/I-15 interchange. This analysis need not be extensive. Pursuant to CEQA Guidelines Sections 15065, 15130, and 15355, we request that the MCP's "effects" be "considered together" with "closely related past, present, and reasonably foreseeable probable future projects" (not merely current projects adjacent to the MCP, or those that are consistent with the County General Plan).

3. Along any of the routes for Alternatives 4/5/6/7, at the corner of Cajalco and Wood Roads, there is a constructed wetland mitigation site established as a Clean Water Act § 401 Certification condition for the Boulder Heights development project that should be avoided (the 9 TWS DV alternative does not have this impact). Further, DEIR/DEIS p. 4-13 indicates that if Alternatives 4/5/6/7 are selected, then impacts posed by a new confined Cajalco Creek alignment could not be mitigated to below a level of significance. The DEIR/DEIS must explain why a different design could not avoid impacting these water bodies.
4. All MCP alternatives enter Temescal Canyon at the same location, 100 feet south of the existing Cajalco Road alignment, and intersect with to the I-15 with two elevated "flyways" and other connectors. As depicted on Figure 3.9.3, the flyways would pass directly over and shade the confluence of Bedford Canyon Creek Wash and Temescal Canyon Creek Wash and be anchored on piers within the Bedford Canyon Creek Wash floodplain. Changes to Cajalco Road and Bridge (over Temescal Creek Wash) evidently are part of a separate element of the MCP project ("Northern Bridge") that we would like to discuss with County staff. One note said that the Cajalco Road/I-15 area would undergo a major revision by 2011. Because there are mitigation sites near this location, clarification regarding the project's effects on Cajalco Road and its usage are needed. For reasons outlined below, we would like to discuss relocation of certain proposed structures in order to minimize impacts to beneficial uses of the Temescal Creek Wash floodplain.

Regional Board staff have been overseeing three mitigation projects in the confluence of Temescal Creek Wash and Bedford Canyon Creek Wash and their floodplains, involving restoration of beneficial uses, in compliance with permits administered by the Regional Board:

- a) SWRCB Water Quality Order No. 2004-0004-DWQ, City of Corona - To mitigate for loss of wildlife habitat associated with construction within Bedford Canyon Creek Wash, a restoration plan is being implemented adjacent to the City of Corona Wastewater Treatment Plant No. 3.



- b) Order No. R8-2003-0015, Waste Discharge Requirements for SE Corporation, Dos Lagos Project — To mitigate for loss of wildlife habitat associated with construction within and adjacent to Bedford Canyon Creek Wash and Temescal Creek Wash, a program for exotic vegetation removal and streambed planting is being conducted across the Bedford Canyon Creek Wash floodplain and in part of the confluence.
- c) Amendment to 401 Water Quality Certification File No. 332000-05, for SE Corporation, Dos Lagos Project – To mitigate for loss of wildlife habitat associated with construction of the Temescal Canyon Road bridge over Bedford Canyon Creek Wash and armoring of the Bedford Canyon Creek Wash channel. Similar restoration work is being done in conjunction with b), above, after lengthy negotiations with SE Corp. over available mitigation sites. As part of these requirements, SE Corp. has entered into an agreement with the City of Corona (City) to maintain a drainage inlet structure located on the south side of Cajalco Road, east of Temescal Canyon Road. We request that the DEIR/DEIS assure that if this inlet structure is moved or replaced, a responsible agency will agree to accept and carry out the responsibility for its ongoing operation and maintenance.

Another possible project in and around the Temescal Creek Wash/ Bedford Canyon Creek Wash confluence, entails the transfer of five acres of this floodplain area from SE Corp. to Riverside County Flood Control District. Any project at the confluence would likely be encroached upon by the MCP, associated widening of the Cajalco Road Bridge, and/or the projected "Northern Bridge." The EIR/EIS should explain and evaluate how the MCP route and structures would change the Cajalco Road Bridge, floodplain, and confluence. We request that proposed MCP project elements not diminish the quality of the beneficial uses that are now under restoration in the vicinity of this confluence. The EIR/EIS needs to describe how BMPs, designs, and construction procedures will avoid introducing to this riparian habitat the contaminants and permanent disturbance associated with runoff, construction, shading, and traffic, so that recognized WILD, WARM, RARE, REC2, and GWR beneficial uses (p. 3.9-12) would not be degraded.

If you have any questions, please call Glenn Robertson at (951) 782-3259 or [grobertson@waterboards.ca.gov](mailto:grobertson@waterboards.ca.gov), or me at (951) 782-3234 or [madelson@waterboards.ca.gov](mailto:madelson@waterboards.ca.gov).

Sincerely,



Mark G. Adelson, Chief  
Regional Planning Programs Section

cc: State Clearinghouse

U.S. Army Corps of Engineers, Los Angeles – Jason Lambert/Public Info site

U.S. Fish and Wildlife Service, Carlsbad – Doreen Stadlander

California Department of Fish and Game – Magdalena Rodriguez/Jeff Brandt/Mike Flores

Best Best & Krieger, Riverside - Michelle Ouellette

Jacobs Engineering, Cypress – Steve Henderson/ cc: Jeannie Lee Bang/ Dawn Nevils

Riverside County Habitat Conservation Agency – Gail Barton

Riverside-Corona Resource Conservation District, Riverside – Arlee Montalvo

X:Groberts on Magnolia/Data/CEQA/CEQA Responses/ DEIR-County of Riverside Transportation-Mid-County Parkway.doc

*California Environmental Protection Agency*



Recycled Paper