



**RIVERSIDE COUNTY FLOOD CONTROL
AND WATER CONSERVATION DISTRICT
1995 MARKET STREET
RIVERSIDE, CA 92501-1770
VOICE: 951.955.1200
FAX: 951.684.8409**

FACSIMILE TRANSMITTAL

PAGES: 4, including cover sheet.

TO: RCTC

ATTN: Cathy Bechtel

FAX NUMBER: 787-7920

FROM: Kris Flanigan

DATE: 1/8/09

RE: Flood Control's revised comments
DEIR Mid County Parkway

COMMENTS: _____

WARREN D. WILLIAMS
General Manager-Chief Engineer



1995 MARKET STREET
RIVERSIDE, CA 92501
951.955.1200
FAX 951.788.9965
www.rcflood.org

**RIVERSIDE COUNTY FLOOD CONTROL
AND WATER CONSERVATION DISTRICT**

January 7, 2009

Ms. Cathy Bechtel
Riverside County
Transportation Commission
4080 Lemon Street, 3rd Floor
Riverside, CA 92502-2208

Dear Ms. Bechtel:

Re: Draft Environmental Impact Report/
Environmental Impact Statement for the
Mid County Parkway

This letter is written in response to the Draft Environmental Impact Report/Environmental Impact Statement (Draft EIR/EIS) for the Mid County Parkway (MCP) and supersedes our previous letter dated November 12, 2008. The proposed project consists of the construction of a roadway from Interstate 15 on the west to State Route 79 on the east. The roadway will run some 32 miles and extend through the cities of Corona, Perris, and San Jacinto within western Riverside County, California.

The Riverside County Flood Control and Water Conservation District has the following comments/concerns that should be addressed in the DEIR:

1. Existing District facilities are located within the proposed project area and may be impacted. Any work that involves District right-of-way, easements or facilities will require an encroachment permit and/or cooperative agreement from the District. The construction of facilities within road right-of-way that may impact District storm drains should also be coordinated with us. To obtain further information on encroachment permits or existing facilities, contact Ed Lotz of the District's Encroachment Permit Section at 951.955.1266.
2. The District is a signatory to the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP). For purposes of procuring an encroachment permit from the District, the permit applicant will need to demonstrate that the portion of the project located within District rights-of-way, easements or facilities are consistent with the MSHCP. The MSHCP consistency report/analysis should address, at a minimum, Sections 3.2, 3.2.1, 6.1.2, 6.1.3, 6.1.4, 6.3.2, 7.5.3 and Appendix C of the MSHCP. In addition, Perris Valley Channel is currently designated as Public/Quasi Public (P/QP) lands in the MSHCP and impacts to P/QP lands should be addressed in the DEIR.

3. The proposed project is located within the District's Lake Mathews, Mead Valley, Perris Valley, San Jacinto River, Lakeview/Nuevo, Northwest Hemet and San Jacinto Master Drainage Plans (MDPs). When fully implemented, these MDP facilities will provide flood protection to relieve those areas within the plan of the most serious flooding problems and will provide adequate drainage outlets. An exhibit outlining the MDP proposed facilities, and possible impacts on these facilities, should be included in the DEIR. To obtain further information on the MDPs and the proposed District facilities, contact Dale Anderson of the District's Planning Section at 951.955.1345.
4. Aside from FEMA mapped floodplains, the DEIR does not appear to include information regarding runoff from smaller watersheds or flooding from unmapped floodplains. The proposed project will be crossing many water courses that are not identified as mapped floodplains. For example, under current conditions, sheet flow runoff inundates the Ramona Expressway in the community of Lakeview. Thus, to protect the road, it is likely the storm runoff has to be diverted and/or concentrated either by elevating the roadbed and/or by providing culvert/bridge crossings needed for the passage of storm runoff. The DEIR should show how the MCP will be protected from storm runoff at various locations through all reaches of the project. A drainage study should be conducted for the entire length of the MCP that identifies each location where crossings or drainage improvements will be needed. Once crossing locations are identified, the DEIR should indentify the potential onsite and offsite impacts and how these impacts will be addressed.
5. The Conceptual Mitigation Plan shown in Appendix Q of the DEIR proposes some mitigation areas within District's existing right-of-way. The DEIR should evaluate the potential impacts to flood control related issues associated with the existing right-of-way. Any project that involves District right-of-way, easements, or facilities should be closely coordinated with the District. Please coordinate with Steve Stump of the District's Operation and Maintenance Division at 951.955.1280.
6. Portions of the project are located within Federal Emergency Management Agency (FEMA) Special Flood Hazard Areas (SFHA) and are subject to a 1 percent or greater chance of flooding in any given year. Any development or encroachments made to the SFHA shall be reviewed by the community's floodplain administrator to determine whether the proposed project will be reasonably safe from flooding without adversely affecting adjacent properties. This may include the submittal of studies, calculations, plans and other information required to meet FEMA requirements, and should further require that the applicant obtain a Conditional Letter of Map Revision (CLOMR) in accordance with Title 44 Section 60.3 (d)(4) of the Code of Federal Regulations prior to final approval of the project, and a Letter of Map Revision (LOMR) immediately after completion of the project.

Ms. Cathy Bechtel
Re: Draft Environmental Impact Report/
Environmental Impact Statement for the
Mid County Parkway

-3-

January 7, 2009

7. The proposed project may impact jurisdictional areas regulated by the U.S. Army Corps of Engineers, the Regional Water Quality Control Board and the California Department of Fish and Game under Sections 404 and 401 of the Federal Clean Water Act, the California Porter-Cologne Water Quality Act and Section 1600 of the California Fish and Game Code. The applicant will be responsible for obtaining all regulatory permits associated with any regulated impacts involving District right-of-way, easements, or facilities. Along with construction, regulatory permits should include provisions for the long-term operation and maintenance of the drainage facilities and appurtenant structures such as abutments, pilings and adjacent bank stabilization. Authorization should be pursued to perform routine flood control maintenance of bridges, culverts and selected channels that would include mechanical clearing of debris, sediment and/or vegetation to prevent flooding of adjacent roadways or buildings. Copies of the draft permits should also be submitted to the District for review.

Thank you for the opportunity to comment on the DEIR. Please forward any subsequent environmental documents regarding the project to my attention at this office. Any further questions concerning this letter may be referred to Art Diaz at 951.955.4643 or me at 951.955.8581.

Very truly yours,


KRIS FLANIGAN
Senior Civil Engineer

c: TLMA
Attn: David Mares
County Planning
Attn: Kathleen Browne
Steve Stump
Ed Lotz
Dale Anderson
David Garcia
Mckbib Degaga

AD:mcv
P8\123044