## **Carmen Lo**

Sent: Wednesday, April 10, 2013 10:42 AM

**To:** sbein@rbf.com; Carmen Lo

**Subject:** Mid County Parkway Project: New Feedback - ID# 1325

From Arlene Chun abchun@rcflood.org

Phone: Address: City, State: Zip: 92501 Parcel: Comments:

Thank you for the opportunity to comment on the Mid County Parkway RDEIR/SDEIS. The hard copy/wet-signed form of the comments below are following via USPS.

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Ms. Cathy Bechtel

Riverside County Transportation Commission Post Office Box 12008 Riverside, CA 92502

## Dear Ms. Bechtel:

This letter is written in response to the Recirculated Draft Environmental Impact Report/Supplemental Draft Environmental Impact Statement (RDEIR/SDEIS) for the Mid County Parkway (MCP). The proposed project consists of the construction of a roadway from Interstate 215 on the west to State Route 79 on the east. The proposed 16-mile roadway is designed to relieve local and regional traffic congestion between the cities of Perris and San Jacinto and surrounding Riverside County communities.

The District has the following comments/concerns that should be addressed in the Final EIR/EIS:

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.

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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 Final EIR/EIS.

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3. 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 Wildlife 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 road

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ways or buildings. Copies of the draft permits should also be submitted to the District for review.

- 4. The Conceptual Mitigation Plan shown in Appendix P of the RDEIR/SDEIS proposes some mitigation areas within District's existing right-of-way. The Final EIR/EIS 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 Zully Smith of the District's Operations and Maintenance Division at 951.955.1280.
- 5. In addition to the Perris Valley and San Jacinto River Master Drainage Plans (MDPs), the proposed project is also located within the District's Lakeview/Nuevo, Northwest Hemet, and San Jacinto 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 Final EIR/EIS. To obtain further information on the MDPs and proposed District facilities, please contact Edwin Quinonez of the District's Planning Section at 951.955.1345.
- 6. Aside from FEMA mapped floodplains, the RDEIR/SDEIS does not appear to include information regarding runoff from smaller watersheds or flooding from unmapped floodplains. The proposed project will be crossing many watercourses 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 R-4-8 crossings needed for the passage of storm runoff. The Final EIR/EIS 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 Final EIR/EIS should identify the pote ntial onsite and offsite impacts and how these impacts will be addressed.

Thank you for the opportunity to comment on the RDEIR/SDEIS. 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 Arlene Chun at 951.955.5418 or me at 951.955.1233.

Very truly yours,
MIKE WONG
Engineering Project Manager
Riverside County Flood Control
and Water Conservation District
1995 Market Street
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