



MWD
METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

Executive Office

January 8, 2009

Via Email & FedEx

Ms. Cathy Bechtel
Riverside County Transportation Commission
PO Box 12008
Riverside, CA 92502-2208

Dear Ms. Bechtel:

**Notice of Availability of a Draft Environmental Impact Report/
Environmental Impact Statement for the Mid County Parkway Project**

The Metropolitan Water District of Southern California (Metropolitan) has reviewed the Draft Environmental Impact Report/Environmental Impact Statement (DEIR/EIS) for the Mid County Parkway Project, located within western Riverside County.

Metropolitan currently owns and operates several facilities within the boundaries of the area described in the DEIR/EIS, including Lake Mathews, the Colorado River Aqueduct, the Upper Feeder pipeline, the Lower Feeder pipeline and the Lake Perris Bypass pipeline and pumpback facilities. In addition, Metropolitan's approved Central Pool Augmentation (CPA) pipeline and treatment plant are within or adjacent to the boundaries of the proposed study area. Furthermore, Metropolitan maintains ownership and jointly manages the Lake Mathews Multiple Species Habitat Conservation Plan/Natural Community Conservation Plan (MSHCP/NCCP) reserve.

As discussed in our previous comments to you regarding the Mid County Parkway Project, there are several critical issues that must be resolved before Metropolitan will consider granting approval for the crossing of our lands and/or facilities. Our issues are as follows:

ENVIRONMENTAL ISSUES

Comment 1: Reserve Definitions

The descriptions, and the distinctions, of the various reserves in the project area are sometimes unclear and potentially misleading, no doubt due to the complex relationships in establishment, management, and purposes of the reserves. The narrative discussions in different levels of detail in different sections of the document do not appear to provide sufficient information to fully disclose the importance of reserve-related issues. A figure, or perhaps several figures, that clearly depict reserve boundaries and property ownership could be very helpful in this regard. Accompanying the figure (or figures) could be a detailed but succinct description of each reserve, including when it was established, its primary purpose for establishment, the agreements that underlie current management, and ongoing management obligations. Another brief but precise description of the relationships, both legally binding and cooperative, among these reserves would also be useful.

The Lake Mathews Multiple Species Reserve (Reserve), for example, was established in part as a mitigation bank for current and future Metropolitan projects in western Riverside County, and in fact incorporates—but does not supersede—previous agreements among Metropolitan, the California Department of Fish and Game (CDFG) and the California Department of Water Resources to establish a State Ecological Reserve at Lake Mathews. Further, the mitigation bank lands at the Reserve are protected for long-term conservation by a conservation easement held by the Riverside County Habitat Conservation Agency (RCHCA). The Reserve is managed under the terms of a Cooperative Management Agreement among Metropolitan, RCHCA, CDFG, and the U.S. Fish and Wildlife Service, thus limiting Metropolitan’s ability to make unilateral decisions regarding Reserve management. None of these important considerations were clearly described in the document, thus understating the importance to Metropolitan that these complex agreements remain intact and that potential adverse project-related impacts to these lands are fully evaluated.

It is also important to note that the Lake Mathews MSHCP is also an NCCP pursuant to agreements with CDFG. Thus, in addition to the state and federal Endangered Species Acts, where they apply, the Lake Mathews MSHCP is also bound by the provisions of the state NCCP process. The Lake Mathews MSHCP should be referred to as "Lake Mathews MSHCP/NCCP."

Comment 2: Amendment to Reserve MSHCP/NCCP

Chapter 3, page 943, of the DEIR/EIS states that if Riverside County moves forward with the widening of Cajalco Road as part of Riverside County’s implementation of the Circulation Element of the General Plan, Metropolitan “would have to agree to a plan amendment.” While an amendment to the Lake Mathews MSHCP/NCCP would be required to allow modifications to Reserve boundaries and impacts to conserved land, Metropolitan would not be required to initiate an amendment or to support efforts by others to do so.

Comment 3: Off-site Mitigation

The document states that indirect impacts to conserved lands would result from construction and operation of the MCP, including increased pollutants and trash, increased potential for fire, trespass, type conversion of habitat, and other edge effects. While the analysis concludes that the impacts would be minimal, it also states that off-site mitigation would offset those impacts as provided for in the County’s MSHCP. Please note that such off-site mitigation would not offset impacts to the Lake Mathews Multiple Species Reserve because Metropolitan is not a signatory to the agreements that established the County’s MSHCP. Mitigation for indirect impacts to the Reserve must be consistent with the provisions of CEQA and of the Lake Mathews MSHCP/NCCP and associated agreements.

Comment 4: Cultural and Paleontological Resources Mitigation

While the preferred alignment (Alternative 9) does not impact Metropolitan property, other potential alignments addressed in the document would. Mitigation measures should be written to consider the rights and responsibilities of property owners regardless of which alignment ultimately is selected. With the exception of human remains and associated burial items, Metropolitan asserts ownership of all artifacts and fossil remains found on Metropolitan property and requests coordination in the

preparation of treatment plans and mitigation plans that could affect those resources. Reference in the mitigation measures for cultural resources should include a requirement that recovered artifacts be placed in a qualified repository that meets all applicable standards and regulations for such a facility (similar to wording for disposition of recovered paleontological materials).

Comment 5: Biological Resources Mitigation

Mitigation measures for potential impacts to burrowing owls, which would result from Alternative 9, specify focused surveys “within” 30 days of construction, and “passive” relocation of birds whose burrows would be impacted. Conducting surveys within 30 days could inappropriately limit the ability to implement meaningful measures prior to construction. As a potential alternative to passive relocation, Metropolitan would support a cooperative effort to investigate the feasibility and implementation of active relocation of burrowing owls into the Lake Mathews Multiple Species Reserve. Such action would require the concurrence of Metropolitan’s Reserve management partners, and must be consistent with management obligations contained in the MSHCP/NCCP, but with concurrence of the Reserve Management Committee, Metropolitan would support use of the Reserve in this way if appropriate.

Comment 6: Wildlife Crossings

Metropolitan recognizes the importance of connectivity between conserved blocks of land in western Riverside County, and thus recognizes --and supports-- the use of wildlife undercrossings and overcrossings as an important measure to ensure the health of wildlife populations in the Lake Mathews Multiple Species Reserve.

WATER QUALITY ISSUES

Comment 7: Watershed Impacts and Mitigation

The document states that indirect impacts from runoff to jurisdictional areas would be negotiated with the U.S. Army Corps of Engineers and CDFG to a level of less than significant. Due to Metropolitan’s concerns about runoff into Lake Mathews from the surrounding watershed, Metropolitan requests coordination for determination of significance and mitigation of such impacts as future negotiations cannot be cited as mitigation for impacts.

Comment 8: Appendix Q

The DEIR identifies a Conceptual Mitigation Plan in Appendix Q and includes potential off-site mitigation areas throughout the Lake Mathews watershed. Some of the mitigation areas identified conflict with water quality protection facility locations identified in the DWQMP, and may conflict with other future areas in which Metropolitan may be seeking to implement water quality improvement projects to protect Lake Mathews. Metropolitan should be consulted in the development of the mitigation plans noted with respect to areas within the Lake Mathews watershed and under the purview of the DWQMP.

Comment 9: Runoff Issues

The document does not adequately address potential runoff impacts to Lake Mathews from the various alternatives that are within the Lake Mathews watershed. In fact, in some sections, Lake Mathews is not even identified as a potential receiving water for surface water drainage (see page S-35, Executive Summary, Vol 1). The project runoff impacts to Lake Mathews, a source drinking water reservoir for over 15 million people, needs to be fully addressed in this document.

Metropolitan should be consulted with respect to any efforts to address and/or negotiate runoff water quality issues and associated mitigation measures that relate to Lake Mathews.

Comment 10: Municipal Supply

On page 3.10-25, the DEIR indicates that “waters in the project area are not used for municipal supply.” This is an inaccurate statement and needs to be corrected.

Comment 11: Drainage Water Quality Management Plan

The document does not acknowledge the requirements of the Drainage Water Quality Management Plan for Lake Mathews (DWQMP), an adopted plan through a joint agreement with Metropolitan, the Riverside County Flood Control and Water Conservation District, and the County of Riverside. This issue has been brought up by Metropolitan in previous correspondence with the Riverside County Transportation Commission but has not been incorporated into the DEIR/EIS. The DWQMP identified several water quality treatment facilities within the Lake Mathews watershed that would address urban runoff impacts with increasing development. Some of the alternatives addressed in the DEIR/EIS include alignments that conflict with the DWQMP requirements. These conflicts need to be fully addressed in the DEIR/EIS. Should there be an impact to the facilities identified in the DWQMP, an evaluation of how the proposed project and mitigation measures meet or exceed water quality protection of Lake Mathews must be included. Coordination with and approval from Metropolitan, Riverside County Flood Control and Water Conservation District, and County of Riverside is necessary for any proposals that would be in conflict with the requirements of the DWQMP.

Comment 12: Flood Control/Water Quality Facilities

Several existing flood control/water quality facilities within the Lake Mathews watershed, such as the Cajalco Dam/Detention Basin, Cajalco Creek sediment basin, and smaller sediment traps south of Cajalco Road are not identified in the descriptions of existing uses. The impacts to these facilities as a result of the project alternatives should be clearly defined and fully mitigated. In particular, the Cajalco Dam/Detention Basin needs to be specifically identified and any potential impacts must be evaluated in detail as this facility plays a very important role in the protection of Lake Mathews from watershed runoff impacts.

Comment 13: Watershed Protection

Alternative 9 would have the least impact on the Lake Mathews watershed and the DWQMP facilities, as it is located primarily outside the watershed. All of the other “build alternatives” could substantially impact those facilities and other watershed protection efforts. We would have significant water quality concerns with any of the other “build alternative” alignments identified and acceptable mitigation of the impacts from those alternatives would be likely infeasible.

Comment 14: BMPs

Several classes of BMPs are identified in the DEIR/EIS to address runoff issues associated with this project. The ability of the project improvements and BMPs to protect Lake Mathews as a source drinking water reservoir must be explicitly detailed in the DEIR/EIS. For example, the DEIR/EIS indicates a projected increased loading of total phosphorus due to the increased volume of runoff generated from the impervious areas proposed. Lake Mathews is the terminal reservoir of the Colorado River Aqueduct. The Colorado River system is phosphorus-limited and an increase in phosphorus levels can stimulate algal related problems for Metropolitan, such as taste and odors, biomass production and filter clogging, algal toxins, etc. The DEIR/EIS should fully address any potential runoff water quality impacts, during or post-construction (stormwater, groundwater dewatering, etc.), that may result from the project and its effects on Lake Mathews and associated drinking water uses.

FACILITY ISSUES

Comment 15: Potential Impacts

Metropolitan has raised a number of issues related to potential impacts to our facilities in our correspondences with RCTC and these letters have been included in Appendix J of the DEIR/EIS. Table 3.5.A of the DEIR/EIS summarizes some of these potential impacts to our facilities and implies that these issues can all be resolved. We disagree. Until such time as extensive investigations and engineering studies have been done, RCTC cannot state with any certainty that the proposed project will have no adverse impacts on Metropolitan facilities. Accordingly, Metropolitan reserves judgment on each of the issues previously identified until such investigations and engineering studies have been done and presented to Metropolitan for review.

Comment 16: Colorado River Aqueduct

Section 2.2.2.3 discusses the proposed preferred alignment (Alternative 9) as being adjacent to Metropolitan’s Colorado River Aqueduct (CRA) based on land use issues and improved interchange configuration and flood plain issues. However, as discussed in various Metropolitan correspondence, this alignment could have significant impacts on the adjacent CRA, which is an unreinforced cut and cover conduit. Metropolitan’s concerns about this alignment are due to the size and extent of the adjacent embankments, the poor soil conditions generally encountered in this area, which together could have the potential to cause significant lateral and horizontal deformation of the CRA, which is unacceptable. The RCTC engineers are currently conducting geotechnical investigations to

determine the actual impacts and potential mitigations that will need to be reviewed and accepted by Metropolitan if this is determined to be the actual alignment.

Comment 17: Existing Land Uses

Figure 3.1.1 of the DEIR/EIS shows existing land uses in the vicinity of Lake Mathews, but does not include a designation for public facilities including the Lake Mathews dam, spillway and operations area, and the Cajalco dam, the main detention basin north of Cajalco Road, and the smaller detention basins on the south side of Cajalco Road. The boundaries of these areas are shown in the Lake Mathews MSHCP/NCCP and in the conservation easement.

Comment 18: Metropolitan Facilities

Figure 3.51a and Table 3.5a do not present any major Metropolitan facilities except for the Colorado River Aqueduct (CRA). These graphics should also present Metropolitan's major pipelines that the alternatives may affect and indicate continuing coordination with Metropolitan in attempting to minimize impacts to these facilities.

Comment 19: Widening of Cajalco Road

The DEIR/EIS discusses Riverside County's plans to widen Cajalco Road in addition to construction of preferred Alternative 9. The document also states that the existing roadway geometry does not meet Caltrans standards for 120 kph (75 mph) in several areas; therefore, widening the existing facility in these areas without redesign is not feasible. Other concerns related to widening Cajalco Road stated in the document include grade and direct access points. Metropolitan has expressed its concerns related to widening Cajalco Road in the past, most recently in its April 18, 2007, letter to RCTC, which are incorporated by reference. Any widening and redesign of Cajalco Road to increase capacity and reduce travel time along that facility will significantly impact several critical Metropolitan facilities including but not limited to the Lake Mathews Multiple Species Reserve lands and Cajalco Dam/Detention Basin. Metropolitan is not aware of any public scoping that may be taking place related to widening Cajalco Road and requests that Metropolitan be notified of such meetings in the future.

Changes to the existing Cajalco Road elevation or width can impact the operational requirements of the Cajalco Dam/Detention Basin (including water impound capacity and access for sludge removal and general maintenance) which would be unacceptable. Portions of the existing Cajalco Dam/Detention Basin are DSOD jurisdictional. Modifications required by the DSOD might impact the operational requirements of the facility and could be unacceptable. Changes to the drainage through Cajalco Road could result in flooding on MWD and adjacent properties. These comments do not apply to alternative 9 but do apply to proposed plans to modify the existing Cajalco Road.

The drainage provisions of the four sedimentation basins along Cajalco Road must be maintained even if modifications to the roadway are implemented.

Ms. Cathy Bechtel

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The DEIR/EIS indicates that there may be closures along Cajalco Road from Gavilan Road to La Sierra. Any road closures must take into account Metropolitan's need to access the southern portions of Lake Mathews via its gates along Cajalco Road.

OTHER ISSUES

Comment 3: Contacts

"Persons contacted" incorrectly identifies Tim Skrove as a representative of the Western Municipal Water District. Mr. Skrove is a Principal Public and Regional Affairs representative of Metropolitan.

Comment 12: Agency Coordination

References to coordination with other agencies generally do not include Metropolitan; however, later in the document, specific discussion of coordination with Metropolitan clearly describes the extensive coordination that has taken place between our agencies to address concerns and common interests.

We appreciate the opportunity to provide input to your planning process and we look forward to receiving future environmental documentation from you about this important project. If we can be of further assistance, please contact Ms. Raeanne Murphy at (213) 217-6319.

Very truly yours,


For Delaine W. Shane
Manager, Environmental Planning Team

RM/rm

Enclosures: Letter dated April 31, 2007
Letter dated April 18, 2007
Letter dated July 31, 2007



MWD

METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

Executive Office

August 31, 2007

Via E-Mail

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

Dear Ms. Bechtel:

Supplemental Notice of Preparation for the Draft Environmental
Impact Statement/Environmental Impact Report for the Mid County Parkway Corridor Project

The Metropolitan Water District of Southern California (Metropolitan) has reviewed the Supplemental Notice of Preparation (Supplemental NOP) for the Draft Environmental Impact Statement/Environmental Impact Report (Draft EIS/EIR) for the Mid County Parkway Corridor Project, located within western Riverside County. This letter contains Metropolitan's response to the Supplemental NOP as a potentially affected public agency.

Metropolitan currently owns and operates several facilities within the boundaries of the study area described in the Supplemental NOP, including Lake Mathews, the Colorado River Aqueduct, the Upper Feeder pipeline, the Lower Feeder pipeline, and the Lake Perris Bypass pipeline and pumpback facilities. In addition, Metropolitan's approved Central Pool Augmentation (CPA) pipeline and treatment plant are within or adjacent to the boundaries of the proposed study area. Furthermore, Metropolitan maintains ownership and jointly manages the Lake Mathews Multi-Species Habitat Conservation Plan/Natural Community Conservation Plan (MSHCP/NCCP) Reserve.

As discussed in our comments to your initial NOP, there are several critical issues that must be resolved before Metropolitan will consider granting approval for the crossing of our lands and/or facilities.

These issues include:

- Impacts to the Lake Mathews reserve lands, which includes the Lake Mathews MSHCP/NCCP Reserve;
- Impacts to the Lake Mathews watershed (e.g., impact to the quality of water entering Lake Mathews);
- Inclusion of the requirements stated in the Lake Mathews Drainage Water Quality Management Plan, a joint agreement between Metropolitan, the County of Riverside, and the Riverside County Flood Control and Water Conservation District;
- Impacts to Metropolitan operational facilities and rights-of-way; and
- Security issues.

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August 31, 2007

Metropolitan addressed these issues in detail in the attached letter to Cathy Bechtel, dated April 18, 2007, and in the attached letter to Rick Simon, dated July 31, 2007.

Metropolitan would also like clarification regarding the Riverside County Transportation Commission's "preferred alternative" for the Mid County Parkway, and clarification regarding the issue of the possible widening of Cajalco Road.

As previously stated, Metropolitan cannot support or sanction any alternative that enters or impacts the Lake Mathews MSHCP/NCCP. The lead agency, with Metropolitan's consent and overview, would need to review and assess the legal ramifications associated with modifications to the Lake Mathews MSHCP/NCCP, and determine the risks and benefits to Metropolitan. It is Metropolitan's understanding that the MSHCP/NCCP only allows for the adding of species or lands – not for changing or exchanging lands. Any changes to the MSHCP/NCCP and to existing legal documents establishing the reserve, including existing conservation easements, would require the approval by all members of the reserve management committee. As such, the lead agency would need to address the plausibility of modifying the MSHCP/NCCP given the constraints outlined in the legal documents that established the reserve.

Additionally, as set forth in our prior correspondence, Metropolitan has significant engineering issues related to the protection of our existing facilities and to the operation and maintenance of our water distribution system that is impacted by the various alternative alignments. These facilities are a critical part of Metropolitan's distribution system, which imports water to over 18 million customers in Southern California. Extensive engineering and geotechnical work will need to be undertaken to ensure that the location of the proposed corridor will not compromise the integrity of our distribution system, and will not restrict our ability to maintain, operate, add, or replace facilities along our right-of-way. There may also be situations where it is not possible to mitigate potential impacts to our facilities and a realignment of the corridor away from our facilities may be required.

We appreciate the opportunity to provide input to your planning process and we look forward to receiving future environmental documentation and the Draft EIR on this Project. If we can be of further assistance, please contact Mr. John Shama at (213) 217-6319.

Very truly yours,



For Delaine W. Shane
Interim Manager, Environmental Planning Team

RM/rm
(Public Folders/EPU/Letters/29-AUG-07B.doc – Cathy Bechtel)

Enclosures: Letter dated April 18, 2007
Letter dated July 31, 2007



MWD

METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

Office of the General Counsel

April 18, 2007

Via Electronic Mail & Federal Express

Ms. Cathy Bechtel
Riverside County
Transportation Commission
4080 Lemon Street, 3rd Floor
Riverside, CA 92501

Re: Mid County Parkway Project

Dear Ms. Bechtel:

The Metropolitan Water District of Southern California (Metropolitan) is writing to comment on the Riverside County Transportation Commission's (RCTC) proposed alignments for its Mid County Parkway (MCP or project).

As you know, Metropolitan has worked cooperatively with RCTC on its consideration of alternative routes for, and environmental study of, the MCP. We understand that RCTC is preparing to issue its draft environmental impact report/environmental impact statement (Draft EIR/EIS) soon, and wanted to reiterate Metropolitan's comments and concerns regarding the project at this critical juncture. Enclosed and incorporated by reference are copies of prior correspondence that set forth Metropolitan's position on the project.

In summary, Metropolitan's primary concerns with the proposed MCP are:

- a. Impacts to Lake Mathews reserve lands and associated conservation, mitigation, and management pursuant to agreements with U.S. Fish and Wildlife Service, California Department of Fish and Game, and Riverside County Habitat Conservation Agency, including the Lake Mathews Multiple Species Habitat Conservation Plan/Natural Community Conservation Plan (MSHCP/NCCP or reserve).
- b. Impacts to the Lake Mathews watershed, including impacts to Metropolitan's Cajalco Creek Dam and adjunct detention basins and other existing and future facilities necessary to control urban runoff into Lake Mathews in order to meet water quality requirements. Any alignments within the Lake Mathews watershed should incorporate the existing requirements of the Lake Mathews Water Quality & Drainage Management Plan, which is an agreement that was executed between the Riverside County Flood Control and Water Conservation District and Metropolitan to preserve and enhance the water quality within Lake Mathews.

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- c. The protection of Metropolitan's existing large diameter distribution system and related facilities from potential impacts caused by the proposed MCP. The main facilities affected by these proposed alignments include: the Colorado River Aqueduct; Perris Valley Siphon Nos. 1 and 2; Lakeview pipeline; Bernasconi Tunnels Nos. 1 and 2; Inland Feeder; 1st Barrel Casa Loma Siphon; Upper Feeder pipeline; Lower Feeder pipeline; Temescal Power Plant; Lake Perris Bypass and its associated pipeline, Perris Power Plant and Pressure Control Facility; Lake Mathews and its associated power plant, dams and facilities; Chemical Unloading Facility; and the approved Central Pool Augmentation project and its associated future water treatment plant at Eagle Valley and the future water distribution system leaving Eagle Valley.
- d. Homeland security and related access issues to Metropolitan facilities, security gates, and detention basins in and around the proposed project.

Metropolitan requests that RCTC choose an alignment that addresses these concerns by avoiding any impacts to the reserve and operational lands, and by avoiding or minimizing impacts to Metropolitan's facilities. Based on a review of the preliminary data provided by RCTC, only Alternative 9 (the southernmost route) avoids the reserve, and has the fewest impacts on Metropolitan's facilities. Enclosed for reference is a map showing the proposed MCP alignments, including Alternative 9, in relation to the reserve and Metropolitan's major facilities.

Impacts to the Reserve

As we have stated repeatedly in the past, Metropolitan cannot support or sanction any alternative that enters or impacts the reserve in any way. The MSHCP/NCCP encompasses about 5,110 acres of land surrounding Lake Mathews, including the lands in the State Ecological Reserve. These lands are protected for their benefit to endangered, threatened or sensitive species and provide the basis for Endangered Species Act compliance for Metropolitan projects located in Riverside County.

To ensure protection of these lands, Metropolitan recorded a conservation easement that precludes the use of the property in a manner that could adversely affect its values for conservation purposes. Any activities or use of reserve lands for the MCP is incompatible with these conservation commitments, and Metropolitan is precluded from authorizing such activities and use of the reserve. For these reasons, Metropolitan opposes the MCP alignments that would enter and/or impact the reserve in any way.

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Impacts to Metropolitan Facilities

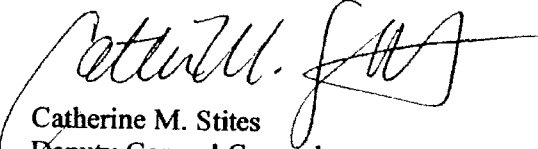
Metropolitan is also concerned about impacts to its facilities and their operation, as set forth in detail in the enclosed correspondence. In short, all of the proposed MCP alignments, including Alternative 9, would impact Metropolitan facilities. In addition, all alignments have the potential to affect how these facilities are operated. RCTC must carefully analyze the potential impacts, including but not limited to those from increased lateral and vertical loading, induced settlement, impacts to operations of the facilities, and altered drainage patterns. See, for example, the enclosed September 28, 2006 and March 29, 2007 correspondence for more detail on this subject. Any proposals to realign or accommodate Metropolitan's facilities, including the costs of such accommodations, are potentially significant and should be analyzed in detail by RCTC. We welcome the opportunity to provide information relevant to this analysis upon your request.

Metropolitan respectfully requests that you address all of the foregoing concerns in the Draft EIR/EIS. We look forward to continuing our cooperative work with RCTC on the MCP.

If you have any questions, please feel free to contact John Shamma at (213) 217-6409 or me at (213) 217-6533.

Sincerely,

Karen L. Tachiki
General Counsel



Catherine M. Stites
Deputy General Counsel

CMS/tjm
Enclosures

cc: Mr. John Shamma, P.E., Metropolitan (w/o encls.)
Mr. Hideo Sugita, RCTC Deputy Executive Director (w/encls.)

THE METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

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cc: Merideth Cann, P.E. (w/encls.)
Charles V. Landry, P.E. (w/encls.)
Jacobs Engineering Group Inc.
3850 Vine Street, Suite 120
Riverside, CA 92507

Mr. Rob McCann (w/encls.)
LSA Associates, Inc.
20 Executive Park
Suite 200
Irvine, CA 92614

Karin Louise Watts Bazan, Esq. (w/encls.)
Office of the Riverside County Counsel
3535 10th Street, Suite 300
Riverside, CA 92501



Mild County Parkway Alternatives
Lake Mathews



MWD
METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

Executive Office

MWD Colorado River Aqueduct
Sta. 10899+00 to 11022+00
Substr. Job No. 2001-06-008

July 31, 2007

Mr. Rick Simon
CH2MHILL
Suite 200
2280 Market Street
Riverside, CA 92501

Dear Mr. Simon:

Mid-County Parkway and State Route 79 Interchange

Thank you for your transmittal letter dated April 19, 2007, submitting a drawing (titled SR79 South, Cut and Fill, Mid-County Parkway Project) showing the proposed alignment and contours for the Mid-County Parkway Project and the State Route 79 Realignment Interchange Project in Riverside County.

Subsequently, we received a geotechnical report (Preliminary Geotechnical Evaluation, Metropolitan Water District, Canal Crossing Sites, State Route 79 Realignment Project, Riverside County, California) prepared by Ninyo & Moore, dated June 8, 2007.

The proposed Mid-County Parkway and State Route 79 (SR79) Realignment projects will potentially impact several of Metropolitan's facilities along their alignments. However, this letter specifically pertains to the interchange between the Mid-County

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Parkway and the realigned SR79, and a portion of the Mid-County Parkway immediately to the west of this interchange.

Metropolitan's 12-foot-4-inch-inside-diameter cast-in-place Colorado River Aqueduct Casa Loma Siphon First Barrel (CRA) is located immediately adjacent to, and south of, the Mid-County Parkway alignment, and is crossed by SR79 at its interchange with the Mid-County Parkway. Metropolitan's manholes, air release and blowoff structures are also located along this reach as indicated in Table 1.

The submitted drawing provides preliminary geometric design and grade information for the proposed Mid-County Parkway, the SR79 interchange, and the portion of the Mid-County Parkway westerly of this interchange to a few hundred feet west of Warren Road. The proposed interchange is located northeasterly of the intersection of the CRA Casa Loma Siphon First Barrel and Sanderson Avenue. The proposed alignment of the Mid-County Parkway westerly of the interchange is north of, and immediately adjacent to, the CRA Casa Loma Siphon right-of-way.

As proposed, the SR79 roadway will be elevated above the CRA and the portion of the Mid-County Parkway that extends easterly of the interchange to Ramona Expressway. The SR79 roadway will be elevated above existing grade by the construction of embankments to a height of about 25 feet directly above and adjacent to the CRA. The elevated SR79 will also require the use of bridge and pier structures adjacent to the CRA to allow the interchange transition roads to span over the CRA, although this information was not provided in the submittal. The Mid-County Parkway will be constructed above grade immediately parallel and adjacent to the north of the CRA right-of-way throughout the reach shown on the submitted drawing. This will be accomplished by the placement of approximately 25-foot-high embankments and the use of bridge structures to cross over roads that are not connected to the parkway. The Mid-County Parkway will also require the use of a retaining wall at the edge of the CRA right-of-way to support the roadway embankment between Sanderson Avenue and Cawston Avenue. The Mid-County Parkway Project will also require the relocation of Sanderson Avenue, the extension of two streets (Cawston Avenue and Odell Avenue) at existing grade across the CRA, and the construction of a new street (Bridge Street), which will be elevated above the Mid-County Parkway. At the west end of the submitted portion of the Mid-County Parkway Project, Warren Road will be realigned. Since Warren Road will be a connector road to

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the Mid-County Parkway, a bridge structure with an approach embankment will be used to cross over the CRA to join the elevated Mid-County Parkway embankment.

We have reviewed your submitted drawing, and our general comments and requirements are as follows:

1. The proposed roadway embankments above and adjacent to the CRA, as shown on the submitted drawing, will subject the CRA to increased vertical loading. The original design and construction of the CRA did not anticipate the construction of projects like SR79 and the Mid-County Parkway. Therefore, the design of the SR79 realignment and Mid-County Parkway project must consider and mitigate for any and all impacts associated with increased vertical loads imposed on the CRA. Vertical loads of concern can be generated by construction, dead, live, and seismic loads. Depending upon the type and configuration of loading imposed on the CRA by new facilities, the CRA is unlikely to be able to accommodate the increased loading from a proposed facility if it exceeds the structural limit of the CRA. Table 2 indicates the specific locations of the Casa Loma Siphon First Barrel that was designed for live loads (road crossings) and dead loads only.

Please note that sufficient geotechnical exploration, testing, and analyses must be conducted to allow evaluation of the increased loads on the CRA. Geotechnical exploration for the design must also consider that protective systems and/or mitigation facilities associated with increased vertical loading might be required for the final design of the SR79 and Mid-County Parkway projects.
2. The construction of roadway embankments above and adjacent to the CRA may subject the CRA to settlement, which would be unacceptable. Depending upon the configuration and location of the embankments relative to the CRA, the CRA may be subject to lateral deformation as well. Please note that the imposition of lateral loads on our pipeline is not acceptable. As a result, roadway embankments planned to be built adjacent to the CRA right-of-way must consider possible deformation of the CRA caused by their construction. No embankments will be permitted within the limits of our right-of-way. Before the proposed development can be approved, a site-specific geotechnical report showing the predicted settlement of the CRA at 10-foot intervals, along with the method of settlement

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analysis, laboratory testing results and any other supporting documents, must be submitted. The three-dimensional configuration of the proposed grading and in-situ soils in terms of the actual size and varying depth of the fill, alluvium, etc., and depth of bedrock and ground water elevation must be collectively considered when determining the settlement along the alignment. The settlement calculation must be carried out at least 10 feet past the point of zero settlement in each direction. The possible settlement due to soil collapse (hydro-consolidation) must also be included in the geotechnical report.

The site-specific geotechnical report must also check slopes and fills affecting the pipeline for stability during an earthquake with an average return period of 475 years corresponding to a 10 percent chance of exceedance in 50 years.

The geotechnical analysis must also determine if lateral forces are imposed upon the CRA due to the new embankments proposed for the Mid-County Parkway. Please note that additional lateral forces on the siphon are not acceptable.

3. The submittal provided information on basic geometric design and some information regarding proposed site grades. However, the submittal did not provide information on anticipated structure locations and associated foundation types (shallow or deep). Since structure location and foundation type relative to the CRA will impact their design and acceptance, such information must be submitted with subsequent submittals. In addition these structures should be located such that they do not limit our ability to excavate our pipelines without shoring, for repair or replacement purposes.
4. Similar to the concerns associated with the construction of embankments adjacent to the CRA, structures and foundations proposed to be built above and near the CRA must not impose loads, vertical or lateral, onto the CRA or result in deformations to the CRA. No loads from the bridges may be imposed on the siphon. Please note that sufficient geotechnical exploration and testing, and geotechnical and structural analyses must be performed to demonstrate that structures and foundations constructed above and near the CRA will not have an adverse impact to the CRA by their construction and operation. We require that information on

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new bridges and foundations near the pipeline be submitted to Metropolitan for review and approval.

5. The construction of roadways and embankments adjacent to the CRA right-of-way may result in trapped surface drainage along the CRA. To ensure that drainage of the CRA right-of-way is maintained and that water will not pond within or adjacent to the CRA, provisions for drainage must be included in the project design. In addition, Metropolitan must be able to dewater the CRA by discharging water into the drainage system. These drainage structures are listed in Table 1.
6. The geotechnical exploration, testing, and analyses program conducted to support the design of the SR79 and Mid-County Parkway projects must also consider the data needs to evaluate potential impacts to the CRA facilities, and to support design efforts for required structural and geotechnical mitigation.
7. The construction of the SR79 Extension and Mid-County Parkway projects must provide for the continuing operation and maintenance of the CRA, including access to the entire alignment of the CRA and all of its above ground facilities. The final design must include provisions to ensure this requirement.
8. Since this portion of the SR79 Extension and Mid-County Parkway projects is in the planning preliminary design stage, additional comments will likely be generated as the design process continues and progresses.

Besides the general criteria stated above, the following are Metropolitan's comments on specific features of the submitted design:

1. The main SR79 roadbed (Station 10928+00), two SR79 north bound off-ramps (Stations 10923+00 and 10923+90) and a south bound on-ramp (Station 10929+90) are proposed to be supported by embankments constructed directly above the CRA. This proposal is not acceptable to Metropolitan, and will need to be revised.

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2. The configuration and height of the proposed roadbed embankments adjacent to the CRA right-of-way will induce settlements and possibly lateral deformations of the CRA. Geotechnical borings drilled for the SR79 project indicate that soft, saturated clay soils exist in the upper 30 feet in the area of the interchange. Based upon the geometry and heights of the embankments adjacent to the CRA right-of-way, and the presence of the compressible clay soils, it is judged that the magnitude of induced deformations to the CRA, both total and differential settlement, and possibly lateral displacement, will be unacceptable. As a result, sufficient geotechnical exploration, testing, and analyses must accompany the final design of the interchange to evaluate potential deformation of the CRA and to demonstrate that proposed mitigation included in the final design is capable of preventing settlement and deformation of the CRA. Potential mitigation could include the incorporation of protective systems, increased bridge spans, or realignment and redesign to minimize or eliminate deformation of the CRA.
3. The submitted plan did not provide locations of foundations proposed for the interchange. Ultimately, this information will need to be submitted, since foundations for interchange structures (shallow and deep), including bridge abutments and piers, constructed near the CRA may impose loads (vertical and lateral) on the CRA, or induce settlement or deformations of the CRA. Sufficient analyses and supporting calculations must be provided to demonstrate that proposed structure and foundation locations and designs will not impose loads unto or induce deformation of the CRA. In general, adequate setbacks for structures and foundations are the best mitigation. At a minimum they should be located at such a depth that it does not interfere with Metropolitan's ability to excavate the CRA or install a possible additional pipeline within our right-of-way.

Mid-County Parkway

1. Main Roadway

- The main roadway will be built on an approximately 25-foot-high, 100-foot-wide embankment that parallels the CRA between the SR79/Mid-County Parkway interchange and Warren Road. Although the main embankment is not being built directly above the CRA, based upon the

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configuration of the embankment, its proximity to the CRA, and the geotechnical characteristics in the area, it is judged that ground deformations to the CRA could still result from the proposed Mid-County Parkway. Please note that sufficient geotechnical exploration, testing, and analyses must be conducted to evaluate potential deformation of the CRA and to demonstrate that the proposed alignment will not adversely impact the CRA with respect to settlement and lateral deformation.

- The side of the roadway embankment between the SR79/Mid-County Parkway interchange and the Cawston Avenue extension adjacent to the CRA right-of-way appears to be supported by a retaining wall. The potential impact of the proposed retaining structure, including its foundation, on the CRA must be evaluated. Please note that sufficient analyses and supporting calculations must be provided to demonstrate that the proposed retaining structure and its foundation will not adversely impact the CRA with respect to settlement and lateral deformation.
- The general drainage pattern in the area of the CRA is sheet flow, typically toward the San Jacinto River to the north. The construction of the Mid-County Parkway embankment adjacent to the CRA will likely disrupt significant portions of the current drainage patterns. Please note that project designs, with supporting calculations, must be provided to demonstrate that drainage patterns interrupted by the roadway embankment will be restored and modified properly to ensure that drainage of the CRA right-of-way is maintained and that ponding within or adjacent to the CRA right-of-way will not occur.

2. Bridge Street

Bridge Street as proposed near Station 10919+00 is not acceptable. If the roadway is at existing grade, a permanent cast-in-place concrete protective slab configured in accordance with Sketch SK-1, can be used to protect the aqueduct from additional vehicle loads. If the proposed roadway crossing over our property is elevated, it must span across our property with a bridge structure. The pipeline in this area should also be analyzed for settlement

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and deformation as a result of the placement of embankment adjacent to our right-of-way. Please note that permanent piles for protective systems, if utilized, must be installed in drilled holes. Driven piles may not be used within the limits of our right-of-way. There must be a minimum of 10 feet of clearance between the pipe and the edge of the drilled hole. The piles must not transfer any load to the siphon. This bridge should be designed such that there is a minimum of 22 feet of clearance between the bottom of the proposed bridge and the existing ground level.

3. Sanderson Avenue Relocation

A protective structure exists at the existing Sanderson Avenue crossing of the CRA (Sta. 10933+50). If the proposed at-grade crossing of Sanderson Avenue is relocated to Station 10937+90, protective measures to protect the aqueduct from vehicle loads must be constructed. A slab as described above can be used to protect the CRA from vehicle loads. Metropolitan's access should also be maintained across this street.

4. Cawston Avenue and Odell Avenue Extensions

- The proposed at-grade crossing of Cawston Avenue near Station 10964+50 is not acceptable. The proposed crossing requires protective measures to protect the CRA from vehicle loads. A slab as described above can be used for protection of the CRA
- The proposed at-grade crossing of Odell Avenue near Station 10992+00 is also not acceptable. There is an existing blowoff structure at Station 10992+10 at the proposed road crossing. We require that the road be relocated so that it does not disrupt Metropolitan's ability to access and operate this structure. In addition, construction of Odell Avenue requires protective measures to protect the aqueduct from vehicle loads. A slab as described above can be used for protection of the CRA at the Odell Avenue road crossing.

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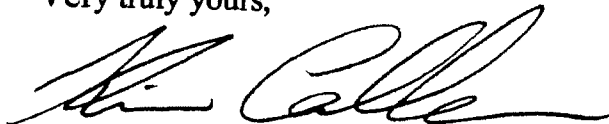
5. Warren Road – Mid-County Parkway Connection

The reconfiguration of Warren Road for its connection to the Mid-County Parkway spans the CRA with a bridge near Station 11017+50. The embankment located within the southern boundary of Metropolitan's right-of-way is not acceptable. This embankment must be moved outside of our right-of-way. Please note that sufficient analyses must be conducted to demonstrate that the proposed bridge abutment locations, and the approach ramp locations and configurations, will not adversely impact the CRA. Plans for the bridge, supports, and foundation must be submitted to Metropolitan for review and approval. In addition, we require a minimum of 20 feet of clearance between the existing ground level and the bottom of any bridge structure.

Facilities constructed within Metropolitan's fee properties and/or easements shall be subject to the paramount right of the Metropolitan to use its rights-of-way for the purpose for which they were acquired. If at any time Metropolitan or its assigns should, in the exercise of their rights, find it necessary to remove any of the facilities from its rights-of-way, such removal and replacement shall be at the expense of the owner of the facility.

For any further correspondence with Metropolitan relating to this project, please make reference to the Substructures Job Number located in the upper right-hand corner of this letter. Should you require any additional information, please contact Shoreh Zareh at (213) 217-6534.

Very truly yours,



Kieran M. Callanan, P.E.
Manager, Substructures Team

SZ/ly
DOC 2001-06-008-3
Enclosure

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cc: Mr. Hideo Sugita
Deputy Executive Director
Riverside County
Transportation Commission
P.O. Box 12008
Riverside, CA 92502-2208

ATTACHMENT

Mid-County Parkway and SR79 Interchange MWD Colorado River Aqueduct

Table 1

Existing Structure	Station
Manhole	10912+10
Manhole	10932+00
Blowoff structure	10943+14
Manhole	10952+10
Manhole	10972+10
Blowoff structure	10992+10
Blowoff structure	10997+10
Blowoff structure	11002+10
Air Valve structure	11006+70
Manhole	11012+00

Table 2

From Station	To Station	Maximum Cover (ft)	Maximum Live Load	Description
10899+00	10900+60	Existing only	GVW 8,000 lbs	Designed for DL only
10900+60	10901+36	6	AASHTO H20	Road Crossing: North Central Avenue
10901+36	10920+73	Existing only	GVW 8,000 lbs	Designed for DL only
10920+73	10921+49	6	AASHTO H20	Road Crossing: Central Avenue
10921+49	10932+97	Existing only	GVW 8,000 lbs	Designed for DL only
10932+97	10933+79	3-4	AASHTO H20	Road Crossing: Sanderson Avenue
10933+79	1019+79	Existing only	GVW 8,000 lbs	Designed for DL only
11019+79	11020+55	6	AASHTO H20	Road Crossing: Pico Road/Warren Road
11020+55	11022+00	Existing only	GVW 8,000 lbs	Designed for DL only

Note: DL = dead load