



THE METROPOLITAN WATER DISTRICT  
OF SOUTHERN CALIFORNIA

SDU-2

April 8, 2013

**Via E-Mail and Regular Mail**

Ms. Cathy Bechtel  
Riverside County Transportation Commission  
P.O. Box 12008  
Riverside, California 92502

Dear Ms. Bechtel:

Notice of Availability of a  
Recirculated Draft Environmental Impact Report/Supplemental Draft  
Environmental Impact Statement (RDEIR/SDEIS) for the Mid County Parkway Project

The Metropolitan Water District of Southern California (Metropolitan) has received the Notice of Availability for the Recirculated Draft Environmental Impact Report/Supplemental Draft Environmental Impact Statement (RDEIR/SDEIS) for the Mid County Parkway (MCP) project, in western Riverside County. The MCP project is proposed by the Riverside County Transportation Commission (RCTC), the Federal Highway Administration (FHWA) and the California Department of Transportation (Caltrans). RCTC is the lead agency under the California Environmental Quality Act (CEQA) and FHWA is the lead agency under the National Environmental Policy Act (NEPA). Metropolitan is providing comments on the RDEIR/SDEIS as an affected public agency and as a responsible agency, as defined in the State of California Public Resources Code, Section 21069.

Metropolitan owns and operates several facilities within the boundaries of the MCP project study area, including the Colorado River Aqueduct, the Inland Feeder, the Lakeview Pipeline, the Lake Perris Bypass Pipeline, and a number of ancillary features associated with these conveyance facilities. Metropolitan has worked cooperatively with RCTC and the County of Riverside since 2002 to address potential issues pertaining to these facilities, including via formal written correspondence in 2004, 2005, 2007 and 2009, which is attached to this letter and incorporated by reference. Metropolitan's facilities in relation to the MCP project are shown the attached figure, "Mid County Parkway Study Area, MWD Facilities Overlay".

As described in the Notice of Availability, the MCP project is a proposed 16-mile transportation corridor identified in the Riverside County Integrated Project (RCIP). The MCP project is intended to relieve traffic congestion between the cities of Perris and San

Jacinto and within surrounding communities in an east-west travel route connecting I-215 to SR 79. The MCP project includes three Build Alternatives (4 Modified, 5 Modified and 9 Modified) and two No-Build Alternatives (1A and 1B). Metropolitan understands that the MCP project has been modified in the RDEIR/SDEIS to exclude previously proposed alignments between I-15 and I-215, which now are being evaluated under the proposed Cajalco Road Widening Project by the Riverside County Transportation Department (RCTD). Metropolitan also understands that modifications to the proposed MCP project alignments as described in the RDEIR/SDEIS would result in avoidance of Metropolitan's facilities in proximity to Lake Perris.

In previous correspondence, Metropolitan expressed concerns about potential impacts to, and conflicts with, facilities extending from I-15 to SR 79. Proposed modifications have removed concerns about Lake Mathews and related facilities west of I-215 as part of this project, and substantially have removed concerns about facilities in the immediate vicinity of Lake Perris. The project does propose crossings of Metropolitan's Colorado River Aqueduct (CRA), Inland Feeder and Lakeview Pipeline. Consequently, we request continued cooperation by RCTC through MCP project design to address all issues related to these facilities to ensure that they are not compromised in any way by the MCP project.

SDU-2-1

In Section 3.5 (Utilities), Metropolitan provides the following comments on Table 3.5.A (Temporary Impacts to Utility Facilities), under the subheading "Metropolitan Water District of Southern California (Metropolitan)".

- The first sentence in the "Impacts" passage would correctly read, "The MCP alignment, at various locations, would be located adjacent to and cross the Metropolitan CRA, Inland Feeder and Lakeview Pipeline."
- The passage states, "In areas where the MCP is running roughly parallel to the CRA, the design would incorporate elements to ensure that settlement from the roadway embankments is either minimized or avoided." The design also should ensure that seismically induced displacement of the CRA, Inland Feeder and Lakeview Pipeline is minimized or avoided.
- In addition to the measures described in this passage, static and seismic analyses of potential impacts to the CRA, Inland Feeder and Lakeview Pipeline must be performed in accordance with Metropolitan's Geotechnical Guidelines. An updated version of these Guidelines is attached for your reference.

SDU-2-2

SDU-2-3

SDU-2-4

As previously noted, the project was modified to exclude the Lake Mathews area; therefore, from a Lake Mathews watershed perspective, water quality concerns related to the MCP are not anticipated. Metropolitan will continue to track the Cajalco Road Widening Project, which is anticipated to have a greater impact. The MCP project would impact surface water and groundwater quality in the San Jacinto watershed, which includes Lake Perris (a secondary State Water Project water source); however, the

Ms. Cathy Bechtel

Page 3

April 8, 2013

RDEIR/SDEIS adequately addresses potential water quality impacts by proposing pollution prevention and treatment BMPs to target constituents of concern from transportation facilities. In addition, permits from the Regional Water Quality Control Board would require monitoring to evaluate the effectiveness of these BMPs. Should the proposed BMPs be substantively changed in the future, we request the opportunity to review those changes.

SDU-2-5

The RDEIR/SDEIS does not specifically identify the presence of cultural sites on Metropolitan property and none are anticipated. In the unlikely event that cultural materials are discovered on Metropolitan property and except as provided for in PRC Section 5097.98, Metropolitan, as the property owner, would consult with RCTC on their disposition in a qualified repository at the conclusion of the project. Mitigation and curation costs would remain the responsibility of the project.

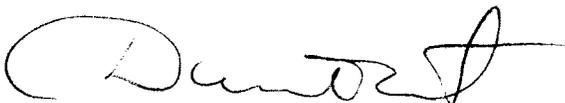
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Metropolitan requested in previous correspondence that additional analysis and engineering be submitted for Metropolitan's review and acceptance as they pertain to the CRA, adjacent pipelines, ancillary facilities and rights-of-way. Metropolitan will be unable to approve any project designs that have not been previously submitted for timely review and determined to adequately avoid or minimize to insignificance potential structural and operational impacts to Metropolitan's infrastructure. Please refer to the attached map and to the attached letter dated May 13, 2005, items I, II and III, for detailed information about the locations of these facilities in relation to the proposed alignments.

SDU-2-7

We appreciate the opportunity to continue to provide input to your planning, environmental clearance and design process, and we look forward to receiving future environmental documentation and technical information about this important project. Please contact me at (213) 217-6669, or [dwest@mwdh2o.com](mailto:dwest@mwdh2o.com), if you have questions or need assistance in addressing our comments. Please coordinate directly with Metropolitan's Substructures manager, Kieran Callanan for submittal and review of technical information pertaining to project design. Mr. Callanan may be reached at (213) 217-7474 or at [kcallanan@mwdh2o.com](mailto:kcallanan@mwdh2o.com).

Very truly yours,



Deirdre West  
Manager, Environmental Planning Team

WP:rdl

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**Enclosures**

- Figure – “Mid County Parkway Study Area, MWD Facilities Overlay”
- Letter dated December 15, 2004 – “Notice of Preparation for the Draft Environmental Impact Statement/Environmental Impact Report for the Mid County Parkway Corridor Project”
- Letter dated May 13, 2005 – “Mid-County Parkway Alignment – Conflicts with MWD Facilities”
- Letter dated January 8, 2009 – “Notice of Availability of a Draft Environmental Impact Report/Environmental Impact Statement for the Mid Count Parkway Project”, includes attachments—
  - Letter dated April 18, 2007 – “Mid County Project”
  - Letter dated July 31, 2007 – “Mid County Parkway and State Route 79 Interchange”
  - Letter dated August 31, 2007 – “Supplemental Notice of Preparation for the Draft Environmental Impact Report/Environmental Impact Statement for the Mid County Parkway Corridor Project”
- “Geotechnical Guidelines”, Revision Date 2/15/13