

December 15, 2004

FEDERAL EXPRESS

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

Dear Ms. Bechtel:

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 Notice of Preparation (NOP) for the Draft Environmental Impact Statement/Environmental Impact Report (EIS/EIR) for the Mid County Parkway Corridor Project, located within western Riverside County. The Riverside County Transportation Commission (RCTC) is the lead agency for the proposed project. The Mid County Parkway, which would be a key east-west regional transportation corridor within Riverside County, is proposed to extend from Interstate 15 on the west to State Route 79 on the east. The project is primarily located along the Ramona Expressway, Cajalco Road, and El Sobrante Road. Metropolitan is providing comments as a potentially affected public agency and a potential responsible agency, as defined in the State of California Public Resources Code, §21069. As indicated in Table A in the NOP, Metropolitan is a potential Responsible and Trustee Agency and RCTC would require approval from Metropolitan to cross Metropolitan lands and or facilities as defined herein.

As you know, Metropolitan owns and operates several facilities within the boundaries of the proposed study area, 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 (MSHCP) reserve (also known as the Lake Mathews – Estelle Mountain Core Reserve), as shown on the attached graphic (see Figure 2).

Metropolitan has worked jointly with RCTC and the County of Riverside over the past eighteen months on the proposed Mid County Parkway and is committed to continuing work with the lead agency in support of this important regional transportation project. However, there are several

critical issues that must be resolved before RCTC approves the project and Metropolitan considers granting approval for the crossing of our lands and/or facilities.

These issues include:

Issues Related to the Lake Mathews MSHCP

The Lake Mathews MSHCP provides Endangered Species Act coverage for and fully mitigates impacts related to a variety of past and future Metropolitan projects, as well as impacts to ongoing operations of Lake Mathews. It is critical that Metropolitan maintains the mitigation and take authorization outlined in the MSHCP in full effect and in perpetuity. As currently proposed in the Draft EIS/EIR, each of the build alternatives for the Mid County Parkway would impact the Lake Mathews – Estelle Mountain Core Reserve. Metropolitan requests that the lead agency consider developing an alternative that would fully avoid impacts to the Lake Mathews – Estelle Mountain Core Reserve.

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 – Estelle Mountain Core Reserve and determine the risks and benefits to Metropolitan. It is Metropolitan's understanding that the MSHCP, which established the Lake Mathews – Estelle Mountain Core Reserve, only allows for adding species or lands – not for changing or exchanging lands. As such, the lead agency would need to address the plausibility of modifying the MSHCP given the constraints outlined in the legal documents that established the reserve. Metropolitan requests that the lead agency initiate discussions with us to ensure that our take authorization is maintained in full effect.

Operational and Maintenance Issues at Lake Mathews

The lead agency also needs to address long-term impacts from the Mid County Parkway to the Lake Mathews Water Quality & Drainage Management Plan. The proposed project has the potential to affect drainage patterns and water quality at Lake Mathews, a critical drinking water reservoir for southern California. It is imperative to both Metropolitan and the County of Riverside that the Draft EIS/EIR addresses potential impacts to Lake Mathews from a water quality perspective, to ensure that a reliable, high-quality drinking water supply is maintained over the long term.

Furthermore, the implementation of the Mid County Project must allow uninterrupted operational access to the perimeter shoreline of Lake Mathews. Metropolitan utilizes Lake Mathews primarily as a storage reservoir for untreated water, however a large variety of other operational activities occur at Lake Mathews as well. Uninterrupted, long-term access to the perimeter shoreline at Lake Mathews will be required to: (1) perform annual shoreline vegetation clearing

activities, (2) allow patroller access in order to maintain security around Lake Mathews, and (3) allow general operational access for emergency activities, should the need ever arise.

The proposed project must also avoid impacts to Metropolitan's operational area along the north shore of Lake Mathews, near the intersection of El Sobrante and La Sierra roads. This area is utilized for management of Metropolitan's construction unit, which is essential to emergency response efforts within Metropolitan's service area. The proposed project's environmental documentation needs to analyze the potential impacts to these facilities and address avoidance and/or minimization measures to ensure minimal impacts to Metropolitan's operations.

Operational and Maintenance Issues at Other Existing and Future Metropolitan Facilities

The proposed project must also avoid impacts to Metropolitan's approved CPA project, in particular the future treatment plant at Eagle Valley and the future distribution system leaving Eagle Valley. This approved project is an essential component in Metropolitan's obligation to deliver reliable, high-quality water to both Riverside and Orange counties, and as such the lead agency should specifically address any potential impacts of the Mid County Parkway project to the CPA. In addition, Metropolitan's future treatment plant at Eagle Valley will most likely begin construction prior to implementation of the Mid County Parkway project – the lead agency's Draft EIS/EIR needs to acknowledge the treatment plant project and address avoidance and/or minimization measures to ensure minimal impacts to the CPA treatment plant project.

In addition, Metropolitan is concerned with potential impacts from the proposed project to other Metropolitan facilities within the project area. These facilities include the Colorado River Aqueduct, the Upper Feeder pipeline, the Lower Feeder pipeline, and the Lake Perris Bypass pipeline and pumpback facilities, and the approved CPA pipeline. Metropolitan must be allowed to maintain its rights-of-way to its facilities at all times in order to repair and maintain the current condition of those facilities. It is necessary that the lead agency avoid potential impacts to Metropolitan's facilities that may result from the proposed project, including any restrictions on Metropolitan's rights-of-way and/or any operations and maintenance activities. In order to avoid impacts, coordination with Metropolitan must occur during the planning process and written approval from Metropolitan for proposed design plans should be obtained prior to project approval. Metropolitan requests that the lead agency's Draft EIS/EIR acknowledge Metropolitan's facilities and address avoidance and/or minimization measures to ensure minimal impacts to our rights-of-way and/or facilities.

Other Issues

Metropolitan requests that the lead agency analyze in the draft EIS/EIR the consistency of the proposed project with the growth management plan adopted by the Southern California Association of Governments (SCAG). Metropolitan uses SCAG's population, housing, and employment projections to determine future water demand.

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In addition, Metropolitan encourages projects to include water conservation measures. Water conservation, reclaimed water use, and groundwater recharge programs are integral components to regional water supply planning. Metropolitan supports measures such as using water-efficient fixtures, drought-tolerant landscaping, and reclaimed water to offset any increase in water use associated with the proposed project.

We appreciate the opportunity to provide input to your planning process and we look forward to continued coordination with the County of Riverside on this project. Mr. John Vrsalovich of Metropolitan's Facility Planning Team has been designated as Metropolitan's contact to coordinate with RCTC. Mr. Vrsalovich can be reached at (213) 217-6066.

Very truly yours,

Laura J. Simonek
Manager, Environmental Planning Team

JAH/rdl
(Public Folders/EPU/Letters/08-DEC-04B.doc - Cathy Bechtel)
Enclosure: Planning Guidelines