Final

DWR PERRIS DAM EMERGENCY RELEASE FACILITY

Environmental Impact Report

Prepared for
Department of Water Resources

February 2018

ESA

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Perris Dam Emergency Release Facility Project Final EIR

Published under separate cover as Draft EIR/Recirculated Draft EIR

Included in this Final EIR

CHAPTER 10
Introduction

This Final Environmental Impact Report (EIR) document has been prepared in accordance with the California Environmental Quality Act (CEQA) as amended (Public Resources Code Section 21000 et seq.) and *CEQA Guidelines* (California Administrative Code Section 15000 et seq.). The Final EIR incorporates, by reference, the Draft EIR (included here as **Appendix AA**) and Recirculated Draft EIR (included here as **Appendix AB**) prepared by the Department of Water Resources for the Perris Dam Emergency Release Facility Project (State Clearinghouse No. 201391027) as they were originally published and the following chapters.

Environmental Findings have been prepared for the Final EIR in accordance with Section 15091 of the *CEQA Guidelines*, and are contained in a separate document.

10.1 CEQA Requirements

CEQA Guidelines specify that the Final EIR shall consist of the following:

- The Draft EIR or a revision of that draft;
- Comments and recommendations received on the Draft EIR;
- A list of persons, organizations, and public agencies commenting on the Draft EIR;
- The response of the Lead Agency to significant environmental points raised in the review and consultation process; and
- Any other information added by the Lead Agency.

This Response to Comments document for the Perris Dam Emergency Release Facility Project presents:

- A list of persons, organizations, and public agencies commenting on the Draft EIR and Recirculated Draft EIR (Chapter 11); and
- The written and oral comments received on the Draft EIR and Recirculated Draft EIR along with a response to each comment (Chapter 12).

10.2 Public Participation Process

The Notice of Preparation and the Notice of Availability of a Draft EIR were posted with the County Clerk in Riverside County, the State Clearinghouse, and two local newspapers (The Press-

Enterprise and The Perris Progress/The Perris City News). The documents were also distributed to affected public agencies, community groups, and other interested parties. In addition, one public scoping meeting was held on September 19, 2013 at the Lake Perris Fairgrounds, Harrison Hall, 18700 Lake Perris Drive in Perris, California. This meeting allowed members of the public the opportunity to ask questions and express their concerns and interests about the environmental review of the proposed project prior to completion of the Draft EIR.

The Draft EIR was circulated for public review from September 9, 2016 through October 24, 2016. During this period, DWR held a public meeting to provide interested persons with an opportunity to comment verbally or in writing on the Draft EIR and the project. The public meeting was held on September 27, 2016 at the Lake Perris State Recreation Area, Lakeview Pavilion, 17801 Lake Perris Drive in Perris, California. During the meeting, information about the project was presented. At the meeting, members of the public had the opportunity to ask questions and express their concerns and interests regarding the project and content of the Draft EIR. Several verbal comments were received at the public meeting.

DWR chose to recirculate the Draft EIR in order to attach the Biological Resources Technical Report which had been prepared for the Perris Dam Remediation Program Draft EIR in 2012 and which was referenced extensively in the 2016 Draft EIR. DWR opted to revise and recirculate the following sections of the Draft EIR pursuant to CEQA Guidelines Section 15088.5(c): ES. Executive Summary, 2.0 Project Description, 3.3 Biological Resources, 3.4 Cultural Resources, 3.14 Transportation and Traffic, and 6.0 Alternatives Analysis. These recirculated sections replaced the corresponding sections of the 2016 Draft EIR. All other sections remained unchanged. A Notice of Availability of a Recirculated Draft EIR was posted with the County Clerk in Riverside County, the State Clearinghouse, and two local newspapers (The Press-Enterprise and The Perris Progress/The Perris City News). The documents were also distributed to the same affected public agencies, community groups, and other interested parties. The Recirculated Draft EIR was circulated for public review from September 29, 2017 to November 13, 2017.

10.3 Final EIR Certification and Approval

As the Lead Agency, DWR has the option to make the Final EIR available for public review prior to considering the project for approval (*CEQA Guidelines* §15089[b]). The Final EIR must be available to commenting agencies at least 10 days prior to consideration for approval.

Prior to considering the project for approval, DWR will review and consider the information presented in the Final EIR and will certify that the Final EIR has been adequately prepared in accordance with CEQA. Once the Final EIR is certified, DWR may proceed to consider project approval (*CEQA Guidelines* §15090, §15096[f]). Prior to approving the project, DWR shall make Findings regarding any significant, unavoidable environmental effects identified in the Final EIR, and if necessary, adopt Statements of Overriding Considerations regarding these impacts (*CEQA Guidelines* §15091, §15093). Prior to approving the project, DWR will also certify the EIR and file a Notice of Determination (NOD) with Riverside County and the State Clearinghouse.

10.4 Mitigation Monitoring and Reporting Program

CEQA requires lead agencies to "adopt a reporting and mitigation monitoring program for the changes to the project which it has adopted or made a condition of project approval in order to mitigate or avoid significant effects on the environment" (CEQA §21081.6, *CEQA Guidelines* §15097). The Mitigation Monitoring and Reporting Program (MMRP) is included with this Final EIR (Chapter 13).

10.5 Notice of Determination

Pursuant to Section 15094 of the CEQA Guidelines, DWR will file a Notice of Determination with the State Clearinghouse and Riverside County Clerk within five working days of project approval.

CHAPTER 11
Comment Letters

This chapter contains the comment letters received during the public review period for the Draft EIR and the Recirculated Draft EIR. The letters have been bracketed and numbered and are presented in the order listed in Table 11-1. The responses to comments are provided in Chapter 12 and are labeled to correspond to the comment numbers and letters that appear in the margins of the comment letters.

TABLE 11-1
COMMENTS RECEIVED ON THE DRAFT EIR

Comment No.	Commenting Person/Agency	Date of Comment
Comments received during the Draft EIR Comment Period		
Federal and State Agencies		
1	US Fish and Wildlife Service – Palm Springs and California Department of Fish and Wildlife – Inland Deserts Region	November 7, 2016
Local Agencies		
2	Riverside County Flood Control and Water Conservation District	October 18, 2016
3	Cal Fire –Riverside Unit	October 19, 2016
4	City of Moreno Valley	October 19, 2016
5	City of Perris	October 20, 2016
6	The Metropolitan Water District of Southern California	October 20, 2016
Organizations		
7	Eastern Municipal Water District	October 13, 2016
8	Friends of the Northern San Jacinto Valley	October 14, 2016
9	46th District Agricultural Association – Lake Perris Fairgrounds	October 24, 2016
10	Pechanga Cultural Resources, Temecula Band of Luiseno Mission Indians	October 27, 2016
Public Comments		
11	Oval Entertainment, LLC	October 20, 2016
12	Family A Fair, Inc.	October 21, 2016
13	Rutan & Tucker, LLP	October 21, 2016
14	Val Verde Unified School District	November 16, 2016
15	Public Meeting Oral Comment Transcription	September 27, 2016
Comments received during the Recirculated Draft EIR Comment Period		
16	City of Perris	November 7, 2017
17	The Metropolitan Water District of Southern California	November 13, 2017
18	Friends of the Northern San Jacinto Valley	November 13, 2017

U.S. Fish and Wildlife Service
Palm Springs Fish and Wildlife Office
777 East Tahquitz Canyon Way, Suite
208 Palm Springs, California 92262
760-322-2070
FAX 760-322-4648

California Department of Fish and
Wildlife Inland Deserts Region
3602 Inland Empire Blvd., Suite C-220
Ontario, California 91764
909-484-0167
FAX 909-481-2945

In Reply Refer To:
FWS/CDFW-WRIV-10B0222-17CPA0007

California Department of Water Resources
Attention: Christine Alexander
1416 9th Street
Sacramento, California 95814

November 7, 2016
Sent by email

Subject: Draft EIR for DWR's proposed Perris Dam Emergency Release Facility, Lake Perris State Recreation Area, Riverside County, California

Dear Ms. Alexander:

COMMENT A: The U.S. Fish and Wildlife Service (Service) and the California Department of Fish and Wildlife (Department), hereafter collectively referred to as the Wildlife Agencies, have reviewed the draft Environmental Impact Report (DEIR) for the proposed Perris Dam Emergency Release Facility (ERF or Project) which we received on September 9, 2016. The DEIR was prepared to identify the proposed Project's direct, indirect, and cumulative environmental impacts; to discuss alternatives; and to propose mitigation measures that avoid, minimize, or offset significant environmental impacts.

The primary concern and mandate of the Service is the protection of fish and wildlife resources and their habitats. The Service has legal responsibility for the welfare of migratory birds, anadromous fish, and endangered animals and plants occurring in the United States. The Service is also responsible for administering the Endangered Species Act of 1973 (Act), as amended (16 U.S.C. 1531 et seq.). The Department is responding to the DEIR as a Trustee Agency for fish and wildlife resources (California Fish and Game Code Sections 711.7 and 1802, and the California Environmental Quality Act [CEQA] Guidelines Section 15386), and as a Responsible Agency regarding any discretionary actions (CEQA Guidelines Section 15381), such as the issuance of a Lake or Streambed Alteration Agreement (California Fish and Game Code Sections 1600 *et seq.*) and/or a California Endangered Species Act (CESA) Permit for Incidental Take of Endangered, Threatened, and/or Candidate species (California Fish and Game Code Sections 2080 and 2080.1). The Department also administers the Natural Community Conservation Plan (NCCP) Program.

On June 22, 2004, the Service issued a section 10(a)(1)(B) permit for the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP). The Department also issued Natural Community Conservation Plan Approval and Take Authorization for the MSHCP as per Section 2800, et seq., of the California Fish and Game Code. The MSHCP established a multiple species conservation program to minimize and mitigate habitat loss and the incidental take of covered species in association with activities covered under the permit. The Wildlife Agencies are providing the following comments on the proposed Project as it relates to the biological resources and ecological processes that would be affected by the proposed Project. We are particularly concerned about Project-related effects to the Los Angeles pocket mouse, kangaroo rat habitat suitability, white-tailed kites, riparian birds, and the loss of Riversidean sage scrub. END COMMENT A

COMMENT B: The Project is being proposed by the California Department of Water Resources (DWR) to improve the safe operation of the existing Lake Perris dam Emergency Release Facility, and to reduce

potential flooding to nearby existing residences in the event of a seismic-induced emergency release of the reservoir's water. DWR proposes to modify the Perris Dam's existing emergency release structure and construct a water conveyance facility (levee system) that would reliably control (direct flows from) a reservoir release, and convey emergency flows from Lake Perris in the event of an emergency drawdown. The proposed Project would be constructed across the Lake Perris State Recreation Area (SRA) and the Lake Perris Fairgrounds just north of Ramona Expressway, and connect to the Perris Valley Flood Control Channel.

The proposed emergency release facility has three distinct sections: the SRA Segment, the Fairgrounds Segment, and the Western Segment. If an emergency release was initiated, water would be directed by the proposed levee system across the open SRA land between the dam and Ramona Expressway (the SRA Segment) toward a channel across the southern end of the Lake Perris Fairgrounds (the Fairgrounds Segment). Flows would then be conveyed in a channel along the north side of Ramona Expressway to the Perris Valley Channel (the Western Segment). END COMMENT B

COMMENT C: Impacts and Mitigation Measures

Coastal California Gnatcatcher

The DEIR did not evaluate the Project's effects on the federally threatened coastal California gnatcatcher (*Polioptila californica*, CAGN) and its habitat (coastal sage scrub, also known as Riversidean sage scrub). Table 4-15 of the *Biological Resources Evaluation for the Perris Dam Remediation Project* EIR (BRE) (Psomas 2009) states that although CAGNs were not observed in the Biological Study Area, the species is present in the SRA, and that suitable foraging and breeding habitat is present within the Biological Study Area. The ERF DEIR states that 12 acres of Riversidean sage scrub will be impacted by the Project. We recommend that the loss of gnatcatcher habitat be mitigate by providing for the permanent conservation and management of gnatcatcher habitat off site. END COMMENT C

COMMENT D: Indirect Effects of Construction on White-tailed Kite Communal Roosts

The DEIR acknowledges that suitable nesting and foraging habitat for white-tailed kites (kite), yellow warblers (warbler) and the endangered least Bell's vireo (vireo), is present in the riparian vegetation located just north of the proposed ERF levees, but evaluates the Project as having no effect on them since (1) the Project will not be built in the riparian vegetation, and (2) MM BIO-3 requires surveys for bird nests within 300 feet of the edge of the construction area ("impact area").

Although the proposed construction footprint will not remove riparian vegetation, the sight and sounds of heavy equipment, workmen, and other Project construction activities in the vicinity may discourage the whit-tailed kites from breeding in this area during the construction phase of the Project. White-tailed kites may be discouraged from nesting and roosting in the riparian strand , or may be flushed from their roosts or nests by construction activities. The white-tailed kite (*Elanus leucurus*) is a State "Fully Protected Species" – unlike endangered species, no take of any kind of a "Fully Protected Species" is allowed by state law, not even harassment leading to abandonment of a nest or a communal roosting tree. Thus, if kite nests are present, we recommend that the Project not work in the SRA Segment during the kite's nesting season. If a

kite communal roost is present, then (regardless of season), impacts could be reduced by erecting a temporary visibility barrier along the edge of the work area facing the riparian strip.

The Wildlife Agencies request that the ERF Final EIR (FEIR) include the following information:

1. Report on the presence and seasonal or year-round use of white-tailed kite communal roosts in the riparian strand near the Project site.
2. Report on the past and present occurrence of white-tailed kite nests in the riparian strand.
3. If white-tailed kites are using the riparian strand, please (1) evaluate how the sight of moving workmen and equipment may affect white-tailed kite utilization of nesting trees and existing communal roosts; and (2) estimate the maximum levels of construction noise be at the edge and tops (tree tops) of the riparian strand, and (3) evaluate how those noise levels may affect:
    a) white-tailed kite utilization of nesting trees and communal roosts;
    b) nest occupancy/success in bird Species of Special Concern known or likely to use the strand for courtship and nesting (e.g., yellow warblers).

    The assessment of sound effects should be based on the existing scientific literature regarding white-tailed kites and other raptors, and utilizing an appropriate sound propagation model for construction noise effects to birds (to account for effects to avian hearing rather than human hearing, use the dBC noise scale rather than the dBA scale)END COMMENT D

COMMENTE:If the evaluation in the FEIR finds that the sight or sounds of construction activities may flush kites from nests in the riparian strand, please avoid take of white-tailed kites by implementing the following avoidance measures:

1. If perennially-occupied nests are present (based on previous survey work), please avoid carrying out construction activities in the Project's SRA Segment during the white-tailed kite's breeding season and until all of the young-of-the-year have fledged and left the nests.
2. If no information is available regarding the use of the riparian strand by nesting white-tailed kites and Project ground-disturbing activities may be conducted during the kite's breeding season, please include a commitment to surveying for the presence of occupied kite nests during the species' breeding season and if an occupied nest is detected, suspending construction activities in the SRA Segment until the young kites fledge or the nest is abandoned in the FEIR. END COMMENT E

COMMENT F: Impact 3.3-1b

Stephen's kangaroo rat (SKR) was the only listed ground-dwelling species considered to have medium to high potential to occur within the proposed impact areas in the DEIR. Focused surveys were conducted in 2008, 2012, and 2013 in the Project footprint. SKR was not identified within the construction footprint during protocol surveys, however the DEIR recognizes the potential for SKR to have moved into the construction footprint since 2013. In addition to construction-related impacts, the DEIR recognizes impacts related to inundation as a result of an emergency drawdown. The DEIR proposes to mitigate both potential impacts through the implementation of Mitigation Measure (MM) BIO-2. The Wildlife Agencies agree with the

mitigation approach presented in MM BIO-2 and request that the second and third measures within MM BIO-2 be revised to include the coordination with and approval of CDFW and USFWS when determining appropriate mitigation for SKR impacts. END COMMENT F

COMMENT G: In addition to SKR, the DEIR identifies fourteen other sensitive ground-dwelling wildlife species either known to occur, or with moderate or high potential to occur, within the Project site, including the San Diego banded gecko, coast horned lizard, orange throated whiptail, coastal whiptail, silvery legless lizard, coastal rosy boa, northern red-diamond rattlesnake, northwestern San Diego pocket mouse, Los Angeles pocket mouse, Bryant's woodrat, San Diego desert woodrat, San Diego black-tailed jackrabbit, mountain lion, and American badger. The DEIR determined that impacts to ground-dwelling, non-listed special-status species would be less than significant with mitigation, however no specific mitigation measure was provided. END COMMENT G

COMMENT H: The DEIR attempts to address small mammal impacts through project design elements, stating that "...the proposed project is being designed within the SRA specifically to allow small mammals to continue to use the area as a viable habitat, allowing for movement across the levees and creation of burrows along the slopes" (p. 3.3-28). To improve small mammal habitat suitability along the levees and provide connectivity to the levees from the surrounding grasslands the levees will be seeded with native vegetation. The Wildlife Agencies appreciate the proposal to incorporate potentially suitable habitat into the project design, but are concerned that DEIR is relying on an assumption that the levee will be occupied and utilized by special-status small mammal species. To effectively mitigate or minimize impacts to these special-status small mammal species, the Project must verify that the levee has provided replacement habitat that is, at a minimum, equivalent to the habitat lost, and that the replacement habitat (levee) is being utilized by these special-status species at the same levels as the impacted habitat was.

The Wildlife Agencies request that the FEIR include specific mitigation measures focused on ensuring the levee slopes will provide suitable habitat for special-status species potentially impacted by the project, and that the levee slopes will actually be utilized by those species. The mitigation measures should commit to the preparation and implementation of a Wildlife Agency-approved habitat mitigation and monitoring plan (HMMP) that describes the actions necessary to complete the proposed habitat installation activities along the levees, decommissioned roads, and restored native grassland; monitor and maintain the established habitat; monitor recruitment to and utilization of the levees by special-status species; and includes quantifiable habitat success criteria.

The HMMP should include information and data on pre-project soil texture and looseness (take measurements throughout the LAPM and kangaroo rat occupied areas of the Biological Study Area using a penetrometer, and measure soil bulk density) and use those two baselines as targets for restoring soil texture and looseness to help render the restored areas suitable for small mammal burrowing. Methods to de-compact the soils on the restoration sites, if needed, should be included in the HMMP. We request that a few hundred temporary artificial burrows (sized appropriately for pocket mice and kangaroo rats, respectively) be created using cardboard or wood tubes (so the artificial material will decay over time) to "jump-start" small mammal recolonization on the two restoration sites. The habitat mitigation and monitoring plan should be provided to the Wildlife Agencies for review and approval prior to its implementation.

If it is determined at the end of the monitoring period that the levee slopes are not being utilized, or that utilization is sparse compared to the adjacent avoided, occupied habitats, then additional mitigation, such as the replacement of habitat, should be considered in consultation with the Wildlife Agencies. END COMMENT H

COMMENT I: Impact 3.3-1c

The Project site and adjacent areas have been known to support several listed or special-status avian species, including bald eagle, America peregrine falcon, least Bell's vireo, white-tailed kite, northern harrier, golden eagle, loggerhead shrike, yellow warbler, and other special-status avian species. The DEIR acknowledges the Project could have indirect impacts on some of these species as a result of construction activities, but has determined that the impacts would be less than significant with the implementation of MM BIO-3 through MM BIO-6.

MM BIO-3 requires a qualified biologist conduct preconstruction spring/summer active season reconnaissance surveys for nesting migratory bird species, burrowing owl , and other nesting birds within 300 feet of the construction limits of each Project element to determine and map the location and extent of special-status species that could be affected by the Project. The Wildlife Agencies are unclear whether surveys conducted within "spring/summer active season" would preclude observation of wintering species. The Wildlife Agencies recommend that MM BIO-3 be clarified to ensure reconnaissance surveys are inclusive of all seasons and species that have the potential to be affected, regardless of when they may nest on the Project site. END COMMENT I

COMMENT J: MM BIO-5 and MM BIO-6 propose to avoid direct impacts to nesting birds by removing plant materials outside of the typical nesting season (February 1 through August 31), or by performing preconstruction surveys and establishing buffers surrounding any active nests during vegetation removal activities. Although MM BIO-5 and MM BIO-6 commit to protecting nesting birds from direct impacts as a result of vegetation removal, these measures do not address potential indirect impacts resulting from other Project construction elements (such as earth moving, levee construction, material transport, etc.).

The Wildlife Agencies recommend the FEIR incorporate specific mitigation measures to address potential indirect impacts to any avian species with the potential to occur onsite, including listed, special-status, and non-listed/special-status species. The Wildlife Agencies recommend the mitigation measure commit to preparation and implementation of a Wildlife Agency-approved avian species avoidance plan. The avian species avoidance plan should describe specific measures that will be taken to ensure that impacts to avian species do not occur, including initial and interim monitoring protocols, survey timing and duration, measures to avoid impacts to nesting birds, and project-specific avoidance and minimization measures such as project phasing and timing, monitoring of project-related noise, sound walls, and buffers. END COMMENT J

COMMENT K: Impact 3.3-2

The DEIR discusses impacts to non-native grassland and drainages, but does not address the approximately 12 acres of Riversidean sage scrub (RSS) that would be lost to the construction of the project. Although not identified as such in the DEIR, RSS is considered to be a "sensitive natural community" by both CDFW and USFWS. The Wildlife Agencies recommend the FEIR

acknowledge impacts to this special-status community and provide a mitigation measure to address the loss of this sensitive natural community. The mitigation measure should commit to replacement, restoration, and/or enhancement of RSS habitat, as approved by the Wildlife Agencies. END COMMENT K

COMMENT L: Impact 3.3-6

A portion of the Project alignment falls within Western Riverside Multiple Species Habitat Conservation Plan (MSHCP) Public/Quasi-Public (PQP) land and Stephen's Kangaroo Rat Habitat Conservation Plan (SKRHCP) Core Reserve lands. The Lake Perris SRA, along with the San Jacinto Wildlife Area and adjoining conserved lands, makes up Core H of the MSHCP. Much of MSHCP Core H is also SKRHCP's San Jacinto/Lake Perris Core Reserve. Among other benefits, the Core H/ San Jacinto/Lake Perris Core Reserve provides live-in habitat for several special-status species, including the coastal western whiptail, Belding's orange-throated whiptail, San Diego banded gecko, northern red diamond rattlesnake, San Diego horned lizard, northwestern San Diego pocket mouse, Stephens' kangaroo rat, San Diego black-tailed jackrabbit, bobcat, San Diego desert woodrat, and the Los Angeles pocket mouse.

The DEIR argues that, "....impacts within the MSHCP Public/Quasi-Public land would be considered temporary during construction since the levees would be revegetated and could be used by small mammals and other wildlife species in the area as habitat" (p. 3.3-34). Based on this assertion, the DEIR does not propose to replace PQP lands affected by the Project. Similarly, when considering potential impacts to the SKRHCP Core Reserve, the DEIR finds that the construction of the levees "would not alter the availability of potential Stephens' kangaroo rat habitat" (p. 3.3-34). Based on this finding, the DEIR does not propose to replace or mitigate the loss of SKRHCP Core Reserve lands. Though the Wildlife Agencies are hopeful that the levees will provide suitable habitat for sensitive species of small mammals and reptiles following Project completion, we cannot concur that the Project will result in habitat that is equivalent to the habitat that currently exists (pre-project). Therefore, the Wildlife Agencies strongly recommend the Project replace or mitigate impacts to MSHCP PQP and SKRHCP Core Reserve lands at a minimum 1:1 ratio. Any replacement properties or mitigation proposals should be reviewed and approved by the Wildlife Agencies and appropriate HCP-implementing agencies prior to the initiation of Project activities. END COMMENT L

COMMENT M: Missing EIR Appendix

The ERF DEIR's Biological Resources chapter repeatedly refers the reader to a document allegedly available in Appendix C titled "Biological Resource Evaluation [BRE] of the Lake Perris Dam Remediation Project"; however, the BRE was not included in either the printed or disk copies of the DEIR (including Appendix C) for the ERF. Please attach it to the FEIR. END COMMENT M

COMMENT N: Summary

The Wildlife Agencies are concerned the Project may have a substantial adverse effect on listed and special-status species without the implementation of focused avoidance, minimization, and mitigation measures. As currently written, the DEIR does not provide the level of detail necessary for the Wildlife Agencies to concur that the Project impacts would be reduced to a level

that is less than significant. We suggest that additional mitigation measures be included in the EIR prior to its adoption. The Wildlife Agencies would appreciate the opportunity to meet and discuss our comments and potential mitigation strategies to address the Project impacts. Please contact Heather Pert of the Department at (858) 395-9692, or Jim Thiede of the Service at (760) 322-2070, extension 419, to schedule a meeting. END COMMENT N

Sincerely,

Digitally signed by
KARIN CLEARY-ROSE

08:23:49 -08'00'

for
Kennon A. Corey
Assistant Field Supervisor
U.S. Fish and Wildlife Service

Heather A. Pert
for

Leslie MacNair
Regional Manager
Inland Deserts Region
CA Department of Fish and Wildlife

cc:
Charles Landry, Regional Conservation Authority
Jeff Brandt, California Department of Fish and Wildlife

Literature Cited

Psomas. 2009. Biological Resource Evaluation of the Lake Perris Dam Remediation Project. (August 2008, revised September 2009). Costa Mesa, California.

Comment Letter 2

JASON E. UHLEY
General Manager-Chief Engineer

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FAX 951.788.9965
www.rcflood.org

RIVERSIDE COUNTY FLOOD CONTROL
AND WATER CONSERVATION DISTRICT

October 18, 2016

Emailed this date to:

tbarnes@esassoc.com

Mr. Tom Barnes
Environmental Science Associates
626 Wilshire Boulevard, Suite 100
Los Angeles, CA 90017

Re: Notice of Availability of a Draft Environmental Impact Report for the Department of Water Resources Perris Dam Emergency Release Facility

Dear Mr. Barnes:

COMMENTA: This letter is written in response to the Notice of Availability (NOA) for the Department of Water Resources (DWR) Perris Dam Emergency Release Facility Draft Environmental Impact Report (EIR). DWR proposes to modify Perris Dam's existing emergency release structure and construct a water conveyance facility that would reliably control a reservoir release and convey emergency flows from Lake Perris in the event of an emergency drawdown. The proposed project would be constructed partially within the Lake Perris State Recreation Area and Lake Perris Fairgrounds, just north of Ramona Expressway, and would connect to the Perris Valley Channel. The District has reviewed the EIR and has the following comments:

1. The EIR indicates that an encroachment permit will be required from the District. Please be advised that if an encroachment permit is required, the applicant is required to demonstrate consistency with the applicable sections of the Western Riverside County Multiple Species Habitat Conservation Plan for all work that involves the District rights of way, easements or facilities. To obtain further information on encroachment permits or existing facilities, contact Amy McNeill of the Encroachment Permit Section at 951.955.1266. END COMMENT A

2. COMMENT B: The proposed project may impact federal and state jurisdictional features (e.g., waters of the United States, waters of the State, streambeds, wetlands, etc.) within the existing Perris Valley Channel. As part of the encroachment permit process, the applicant will also be required to submit proof of applicable permits (404, 401, 1602) or documentation that permits are not required to the District prior to the issuance of the encroachment permit. Any regulatory permitting requirements pertaining to the construction and subsequent operation and maintenance of the facility should be reviewed and approved by the District prior to their execution. END COMMENT B

3. COMMENT C: The proposed project is located within the Perris Valley Master Drainage Plan (MDP). 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. The EIR should address impacts to MDP facilities within the proposed project area, specifically Line U and Perris Valley Channel. The MDP maps can be viewed online at www.rcflood.org. To obtain further information on the MDP and the proposed facilities, please contact Edwin Quinonez of the District's Project Planning Section at 951.955.1345. END COMMENT C

4. COMMENT D: As noted on Page 3.1-9 of the EIR, maintenance of the proposed channel may be provided by the District pending the details of a future maintenance agreement. Please note that the District may be willing to maintain the facility, however, the facility would need to be designed to District standards in order for it to be accepted. Edwin Quinonez can provide more details regarding District design standards. END COMMENT D

Thank you for the opportunity to review the EIR. Any further questions concerning this letter may be referred to Kevin Cunningham at 951.955.1526 or me at 951.955.8581.

Very truly yours,

KRIS FLANIGAN

Engineering Project Manager

ec: Amy McNeill
Edwin Quinonez

KCC:mcv
P8\208141

CAL FIRE – RIVERSIDE UNIT
RIVERSIDE COUNTY FIRE DEPARTMENT

John R. Hawkins - Fire Chief
210 West San Jacinto Avenue, Perris, Ca 92570-1915
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PROUDLY SERVING THE UNINCORPORATED AREAS OF RIVERSIDE COUNTY AND THE CITIES OF:

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JOHN BENOIT
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MARION ASHLEY
DISTRICT 5

Date: 10/19/2016

Mr. Tom Barnes
RE: DWR-Perris Dam Emergency Release Facility
Environmental Science Associates
626 Wilshire Blvd., Suite 1100
Los Angeles, CA. 90017

RE: Notice of Availability of a Draft Environmental Impact Report. Perris Dam Emergency release Facility

Dear Mr. Barnes,

With respect to the comprehensive general plan amendment, the Riverside County Fire Department offers the following:

COMMENT A: Fire protection for the above referenced project will be provided by the following Riverside County Fire Station:
Station 90, located at 333 Placentia Avenue in the City of Perris, will respond with one city Quint Ladder Truck providing paramedic service. The distance from the station to the proposed development is approximately 3 miles. This station is staffed 24 hours a day, 7 days a week, with a 4 person crew, providing Paramedic Service. END COMMENT A

Adverse Impacts

COMMENT B: The proposed project will have a cumulative adverse impact on the Fire Department's ability to provide an acceptable level of service. These impacts include an increased number of emergency and public service calls due to the increased presence of structures, traffic and population. The project proponents/developers will be expected to provide an easement or restricted access to Emergency Fire Department Personnel in case of an emergency. END COMMENT B. COMMENT C: The complete closure of Evans Road will delay emergency response from the South side within the City of Moreno Valley and the North Side of the Perris City limits. Lake Perris Drive will be open to FD access only in the event of full road closure. Contractual and monetary agreements are on file between the City of Perris and the City of Moreno Valley for Emergency responses. Full closure of Evans Road will have to be mutually agreed upon all parties, and any detours this project may cause during the construction phase. END COMMENT C

Access

COMMENT D: Fire Department emergency vehicle apparatus access road locations and design shall be in accordance with the California Fire Code, Riverside County Ordinance 460, Riverside County Ordinance 787, and Riverside County Fire Department Standards. This includes full closure of main access areas at Evans Road. END COMMENT D

Water

COMMENT E: Fire Department water system(s) for fire protection shall be in accordance with the California Fire Code, Riverside County Ordinance 787 and Riverside County Fire Department Standards. Plans must be submitted to the Fire Department for review and approval prior to building permit issuance. END COMMENT E

Tract/Parcel Map development cases

COMMENT F: Prior to Building Permit issuance, the required water system, including all fire hydrant(s), shall be installed and accepted by the appropriate water agency and the Riverside County Fire Department prior to any combustible building materials placed on an individual lot. Contact the Riverside County Fire Department to inspect the required fire flow, street signs, and the required all weather surface access roadways. Approved water plans must be at the job site. END COMMENT F.

High Fire Hazard Severity Zone

COMMENT G: The project is located in the "[LRA][SRA] [High][Moderate][Severe] Fire Hazard Severity Zone" of Riverside County as shown on a map titled Very High Fire Hazard Severity Zones, dated April 8, 2010 and retained on file at the office of the Fire Chief and supersedes other maps previously adopted by Riverside County designating high fire hazard areas.

Any building constructed on lots created by this project shall comply with the special construction provisions contained in Riverside County Ordinance 787, Title 14, the California Building Code and Riverside County Fire Department Information Bulletin #08-05. Plans must be submitted to the Fire Department for review and approval prior to building permit issuance. END COMMENT G

Tract/Parcel Map development cases

COMMENT H: Prior to Building Permit issuance, the required water system, including all fire hydrant(s), shall be installed and accepted by the appropriate water agency and the Riverside County Fire Department prior to any combustible building materials placed on an individual lot. Contact the Riverside County Fire Department to inspect the required fire flow, street signs, and the required all weather surface access roadways. Approved water plans must be at the job site. END COMMENT H.

COMMENT I: Further review of the project will occur upon receipt of building plans. Additional requirements may be necessary at that time. END COMMENT I.

If I can be of further assistance, please feel free to contact me at (951) 287-4049 or email Richard.Tovar@fire.ca.gov.

Sincerely,

Richard Tovar
Fire Captain
Strategic Planning

Community Development Department
Planning Division
14177 Frederick Street
P. O. Box 88005
Moreno Valley CA 92552-0805
Telephone: 951.413-3206
FAX: 951.413-3210

October 19, 2016

Mr. Tom Barnes
California Department of Water Resources
625 Wilshire Boulevard. Ste. 1100
Los Angeles, CA 90017

Re: Draft Environmental Impact Report (DEIR) for the Perris Dam Emergency Release Facility

Dear Mr. Barnes

COMMENT A: The City of Moreno Valley appreciates the opportunity to comment on the completed Draft Environmental Impact Report (DEIR) for the Perris Dam Emergency Release Facility. The project is located in unincorporated Riverside County, north of the Ramona Expressway between East Rider Street and the Perris Valley Channel.

The City understands that the proposed project would modify the existing emergency release structure, resulting in a facility that is safer to operate in the event of an emergency. The City has reviewed the DEIR and found that the project would not negatively impact the City of Moreno Valley. Therefore, we do not have any comments to provide on the DEIR document.

Thank you again for the opportunity to review and comment on the Perris Dam Emergency Release Facility project. We look forward to receiving a final copy of the EIR document once it becomes available. Please continue to include the City on any and all mailing lists as well as future notifications of meetings/public hearings associated with the project. END COMMENT A

Should you have any questions or concerns, please contact me at (951) 413-3215.

Sincerely,

Mark Gross Signature

Mark Gross, Senior Planner

cc Allen Brock, Community Development Director
Richard J. Sandzimier, Planning Official Claudia
Manrique, Associate Planner

CITY OF PERRIS

DEVELOPMENT SERVICES DEPARTMENT
PLANNING DIVISION
135 N. "D" Street, Perris, CA 92570-2200
TEL: (951) 943-5003 FAX: (951) 943-8379

October 20, 2016

Tom Barnes
California Department of Water Resources
626 Wilshire Boulevard, Ste. 1100
Los Angeles, CA 90017

Re: Comment Letter - Perris Dam Emergency Release Facility Project Draft EIR

Dear Mr. Barnes:

The City of Perris appreciates the opportunity to comment on the Draft Environmental Impact Report (EIR) for the Perris Dam Emergency Release Facility project. The City of Perris has the following comments:

1. COMMENT A: The City is opposed to the complete closure of Evans Road during bridgework activity. Closure of Evans Road for one year will create significant impacts to nearby residents and schools by worsening traffic conditions in the area. Partial closure for Evans Street (Option A or B) during bridge work activity would allow for the least impacts to local traffic. The City has no objection to partial closure and requests that during construction, traffic police enforcement be increased throughout am/pm traffic peak hours. Traffic signal timing should also be modified at the Evans Road and Ramona Expressway and further south at the traffic signal on Morgan/Evans near May Ranch Elementary School. As well, other on-going and future construction in the vicinity should be included in the traffic analysis. END COMMENT A

COMMENT B: 2. EIR should clearly identify and address operational impacts to the motocross park, fairgrounds and future commercially designated areas nearby. END COMMENT B

COMMENT C: 3. The City is concerned that barrier walls/pillars for the project may adversely affect the availability of water from the subterranean stream. The City has a permit from the SWRCB to appropriate water from the subterranean stream, and a pending application to appropriate additional water. The EIR should address how the construction of the project will affect the existing subterranean stream and impacts to the City's water appropriation. END COMMENT C

4. COMMENT D: The proposed barrier/walls should be designed in a manner to protect the downstream properties and withstand the normal/acceptable natural conditions and events. END COMMENT D

5. COMMENT E: EIR should clarify joint discharge facilities for both Flood Control and Perris Dam release. END COMMENT E

6. COMMENT F: EIR should analyze export/import of materials to the site and should discuss mitigation for road impacts. END COMMENT F

7. COMMENT G: EIR should also explore the alternative of diverting water through the nearby linear park. END COMMENT G

Again, thank you for the opportunity to comment on the Draft EIR. If you require any additional information or clarification, please contact me at (951)943-5003, ext. 272.

Sincerely,

Clara Miramontes
Director of Development Services

Cc: Richard Belmudez, City of Perris – City Manager
Eric Dunn, City of Perris – City Attorney
Habib Motlagh, City of Perris – City Engineer
Mark Lenoir, Assistant Superintendent - Val Verde Unified School District

THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA

Office of the General Manager

October 20, 2016 **Via Electronic and Regular Mail**

California Department of Water Resources
c/o Tom Barnes, Environmental Science Associates
Perris Dam Emergency Release Facility Project
626 Wilshire Blvd., Ste. 1100
Los Angeles, CA 90017
tbarnes@esassoc.com

Dear Mr. Barnes:

Notice of Availability of
Draft Environmental Impact Report for the Perris Dam Emergency Release Facility

COMMENT A: The Metropolitan Water District of Southern California (Metropolitan) has reviewed the Notice of Availability of the Draft Environmental Impact Report for the Perris Dam Emergency Release Facility. The California Department of Water Resources (DWR) proposes to modify Perris Dam's existing emergency release structure and construct a water conveyance facility that would reliably control a reservoir release and convey emergency flows from Lake Perris in the event of an emergency drawdown. The proposed project would be constructed partially within the Lake Perris State Recreation Area (SRA) and Lake Perris Fairground, just north of Ramona Expressway, and would connect to the Perris Valley Channel.

The proposed project includes:

- Modifying the existing emergency release structure by removing the existing bulkhead and replacing it with one or more automated valves
- Constructing conveyance facility improvements that would control a maximum reservoir release up 3,800 cubic feet per second (cfs) and convey emergency flows from Lake Perris in the event of an emergency drawdown.

Metropolitan is a public agency and regional water wholesaler. It is comprised of 26 member public agencies serving approximately 19 million people in portions of six counties in Southern California, including Riverside County. Metropolitan's mission is to provide its 5,200 square mile service area with adequate and reliable supplies of high-quality water to meet present and future needs in an environmentally and economically responsible way. END COMMENT A

COMMENT B: Upon review of the proposed emergency water conveyance system location, Metropolitan has determined that the project has the potential to impact Metropolitan's facilities including the possibility of impacting one of our feeder pipelines. Metropolitan owns and operates the 120-

Comment B Continued: inch-inside-diameter prestressed concrete Lake Perris Bypass Feeder within the limits of this project. This pipeline is a critical part of our distribution system and work in the area of the pipeline will require coordination with Metropolitan. This letter contains Metropolitan's comments to the proposed project as a potentially affected public agency.

Please include Metropolitan as a responsible agency in Table 2-3 on page 2-22. Metropolitan may need to issue an Encroachment Permit in connection with the Lake Perris Bypass Feeder. END COMMENT B.

COMMENT C: Metropolitan must be allowed to maintain its facilities in order to maintain and repair its system. In order to avoid potential conflicts with Metropolitan's facilities and rights-of-way, we require that any design plans for any activity in the area of Metropolitan's pipelines or facilities be submitted for our review and written approval. Any future design plans associated with this project should be contingent on Metropolitan's approval of design plans for portions of the proposed project that could impact its facilities. Impacts to facilities will be dependent on the design and specific location of proposed facilities, and could include, but are not limited to, impacts due to additional loading on Metropolitan's pipeline and scour upon use of the proposed facilities. END COMMENT C

COMMENT D: Detailed prints of drawings of Metropolitan's pipelines and rights-of-way may be obtained by calling Metropolitan's Substructures Information Line at (213) 217-6564. To assist the applicant in preparing plans that are compatible with Metropolitan's facilities and easements, we have enclosed a copy of the "Guidelines for Developments in the Area of Facilities, Fee Properties, and/or Easements of The Metropolitan Water District of Southern California." Please note that all submitted designs or plans must clearly identify Metropolitan's facilities and rights-of-way. END COMMENT D

We appreciate the opportunity to provide input to your planning process and we look forward to receiving future documentation and plans for this project. For further assistance, please contact Ms. Vikki Dee Bradshaw at (213) 217-6028.
Very truly yours,

Vikki Dee Bradshaw

Deirdre West, Team Manager
by Vikki Dee Bradshaw, Principal Environmental Specialist

VDB:vdb
EPT Job No. 20161003EXT

Enclosures: Metropolitan Planning Guidelines
Map


Perris Dam Emergency Release Facility
Lake Perris
Lasselle St
Evans Rd
E Rider St
Ramona Expy
Lakeview Ave
Google earth
© 2016 Google

Guidelines for Developments in the Area of Facilities, Fee Properties, and/or Easements of The Metropolitan Water District of Southern California

1. Introduction

a. The following general guidelines should be followed for the design of proposed facilities and developments in the area of Metropolitan's facilities, fee properties, and/or easements.

b. We require that 3 copies of your tentative and final record maps, grading, paving, street improvement, landscape, storm drain, and utility plans be submitted for our review and written approval as they pertain to Metropolitan's facilities, fee properties and/or easements, prior to the commencement of any construction work.

2. Plans, Parcel and Tract Maps

The following are Metropolitan's requirements for the identification of its facilities, fee properties, and/or easements on your plans, parcel maps and tract maps:

a. Metropolitan's fee properties and/or easements and its pipelines and other facilities must be fully shown and identified as Metropolitan's on all applicable plans.

b. Metropolitan's fee properties and/or easements must be shown and identified as Metropolitan's with the official recording data on all applicable parcel and tract maps.

c. Metropolitan's fee properties and/or easements and existing survey monuments must be dimensionally tied to the parcel or tract boundaries.

d. Metropolitan's records of surveys must be referenced on the parcel and tract maps.

3. Maintenance of Access Along Metropolitan's Rights-of-Way

a. Proposed cut or fill slopes exceeding 10 percent are normally not allowed within Metropolitan's fee properties or easements. This is required to facilitate the use of construction and maintenance equipment, and provide access to its aboveground and belowground facilities.

b. We require that 16-foot-wide commercial-type driveway approaches be constructed on both sides of all streets crossing Metropolitan's rights-of-way. Openings are required in any median island. Access ramps, if necessary, must be at least 16-feet-wide. Grades of ramps are normally not allowed to exceed 10 percent. If the slope of an access ramp must exceed 10 percent due to the topography, the ramp must be paved. We require a 40-foot-long level area on the driveway approach to access ramps where the ramp meets the street. At Metropolitan's fee properties, we may require fences and gates.

c. The terms of Metropolitan's permanent easement deeds normally preclude the building or maintenance of structures of any nature or kind within its easements, to ensure safety and avoid interference with operation and maintenance of Metropolitan's pipelines or other facilities. Metropolitan must have vehicular access along the easements at all times for inspection, patrolling, and for maintenance of the pipelines and other facilities on a routine basis. We require a 20-foot-wide clear zone around all above-ground facilities for this routine access. This clear zone should slope away from our facility on a grade not to exceed 2 percent. We must also have access along the easements with construction equipment. An example of this is shown on Figure 1.

d. The footings of any proposed buildings adjacent to Metropolitan's fee properties and/or easements must not encroach into the fee property or easement or impose additional loading on Metropolitan's pipelines or other facilities therein. A typical situation is shown on Figure 2. Prints of the detail plans of the footings for any building or structure adjacent to the fee property or easement must be submitted for our review and written approval as they pertain to the pipeline or other facilities therein. Also, roof eaves of buildings adjacent to the easement or fee property must not overhang into the fee property or easement area.

e. Metropolitan's pipelines and other facilities, e.g. structures, manholes, equipment, survey monuments, etc. within its fee properties and/or easements must be protected from damage by the easement holder on Metropolitan's property or the property owner where Metropolitan has an easement, at no expense to Metropolitan. If the facility is a cathodic protection station it shall be located prior to any grading or excavation. The exact location, description and way of protection shall be shown on the related plans for the easement area.

4. Easements on Metropolitan's Property

a. We encourage the use of Metropolitan's fee rights-of-way by governmental agencies for public street and utility purposes, provided that such use does not interfere with Metropolitan's use of the property, the entire width of the property is accepted into the agency's public street system and fair market value is paid for such use of the right-of-way.

b. Please contact the Director of Metropolitan's Right of Way and Land Division, telephone (213) 250-6302, concerning easements for landscaping, street, storm drain, sewer, water or other public facilities proposed within Metropolitan's fee properties. A map and legal description of the requested easements must be submitted. Also, written evidence must be submitted that shows the city or county will accept the easement for the specific purposes into its public system. The grant of the easement will be subject to Metropolitan's rights to use its land for water pipelines and related purposes to the same extent as if such grant had not been made. There will be a charge for the easement. Please note that, if entry is required on the property prior to issuance of the easement, an entry permit must be obtained. There will also be a charge for the entry permit.

5. Landscaping

Metropolitan's landscape guidelines for its fee properties and/or easements are as follows:

a. A green belt may be allowed within Metropolitan's fee property or easement.

b. All landscape plans shall show the location and size of Metropolitan's fee property and/or easement and the location and size of Metropolitan's pipeline or other facilities therein.

c. Absolutely no trees will be allowed within 15 feet of the centerline of Metropolitan's existing or future pipelines and facilities.

d. Deep-rooted trees are prohibited within Metropolitan's fee properties and/or easements. Shallow-rooted trees are the only trees allowed. The shallow-rooted trees will not be permitted any closer than 15 feet from the centerline of the pipeline, and such trees shall not be taller than 25 feet with a root spread no greater than 20 feet in diameter at maturity. Shrubs, bushes, vines, and ground cover are permitted, but larger shrubs and bushes should not be planted directly over our pipeline. Turf is acceptable. We require submittal of landscape plans for Metropolitan's prior review and written approval. (See Figure 3).

e. The landscape plans must contain provisions for Metropolitan's vehicular access at all times along its rights-of-way to its pipelines or facilities therein. Gates capable of accepting Metropolitan's locks are required in any fences across its rights-of-way. Also, any walks or drainage facilities across its access route must be constructed to AASHTO H-20 loading standards.

f. Rights to landscape any of Metropolitan's fee properties must be acquired from its Right of Way and Land Division. Appropriate entry permits must be obtained prior to any entry on its property. There will be a charge for any entry permit or easements required.

6. Fencing

Metropolitan requires that perimeter fencing of its fee properties and facilities be constructed of universal chain link, 6 feet in height and topped with 3 strands of barbed wire angled upward and outward at a 45 degree angle or an approved equal for a total fence height of 7 feet. Suitable substitute fencing may be considered by Metropolitan. (Please see Figure 5 for details).

7. Utilities in Metropolitan's Fee Properties and/or Easements or Adjacent to Its Pipeline in Public Streets

Metropolitan's policy for the alinement of utilities permitted within its fee properties and/or easements and street rights-of-way is as follows:

a. Permanent structures, including catch basins, manholes, power poles, telephone riser boxes, etc., shall not be located within its fee properties and/or easements.

b. We request that permanent utility structures within public streets, in which Metropolitan's facilities are constructed under the Metropolitan Water District Act, be placed as far from our pipeline as possible, but not closer than 5 feet from the outside of our pipeline.

c. The installation of utilities over or under Metropolitan's pipeline(s) must be in accordance with the requirements shown on the enclosed prints of Drawings Nos. C-11632 and C-9547. Whenever possible we request a minimum of one foot clearance between Metropolitan's pipe and your facility. Temporary support of Metropolitan's pipe may also be required at undercrossings of its pipe in an open trench. The temporary support plans must be reviewed and approved by Metropolitan.

d. Lateral utility crossings of Metropolitan's pipelines must be as perpendicular to its pipeline alinement as practical. Prior to any excavation our pipeline shall be located manually and any excavation within two feet of our pipeline must be done by hand. This shall be noted on the appropriate drawings.

e. Utilities constructed longitudinally within Metropolitan's rights-of-way must be located outside the theoretical trench prism for uncovering its pipeline and must be located parallel to and as close to its rights-of-way lines as practical.

f. When piping is jacked or installed in jacked casing or tunnel under Metropolitan's pipe, there must be at least two feet of vertical clearance between the bottom of Metropolitan's pipe and the top of the jacked pipe, jacked casing or tunnel. We also require that detail drawings of the shoring for the jacking or tunneling pits be submitted for our review and approval. Provisions must be made to grout any voids around the exterior of the jacked pipe, jacked casing or tunnel. If the piping is installed in a jacked casing or tunnel the annular space between the piping and the jacked casing or tunnel must be filled with grout.

g. Overhead electrical and telephone line requirements:

1) Conductor clearances are to conform to the California State Public Utilities Commission, General Order 95, for Overhead Electrical Line Construction or at a greater clearance if required by Metropolitan. Under no circumstances shall clearance be less than 35 feet.

2) A marker must be attached to the power pole showing the ground clearance and line voltage, to help prevent damage to your facilities during maintenance or other work being done in the area.

3) Line clearance over Metropolitan's fee properties and/or easements shall be shown on the drawing to indicate the lowest point of the line under the most adverse conditions including consideration of sag, wind load, temperature change, and support type. We require that overhead lines be located at least 30 feet laterally away from all above-ground structures on the pipelines.

4) When underground electrical conduits, 120 volts or greater, are installed within Metropolitan's fee property and/or easement, the conduits must be incased in a minimum of three inches of red concrete. Where possible, above ground warning signs must also be placed at the right-of-way lines where the conduits enter and exit the right-of-way.

h. The construction of sewerlines in Metropolitan's fee properties and/or easements must conform to the California Department of Health Services Criteria for the Separation of Water Mains and Sanitary Services and the local City or County Health Code Ordinance as it relates to installation of sewers in the vicinity of pressure waterlines. The construction of sewerlines should also conform to these standards in street rights-of- way.

i. Cross sections shall be provided for all pipeline crossings showing Metropolitan's fee property and/or easement limits and the location of our pipeline(s). The exact locations of the crossing pipelines and their elevations shall be marked on as-built drawings for our information.

j. Potholing of Metropolitan's pipeline is required if the vertical clearance between a utility and Metropolitan's pipeline is indicated on the plan to be one foot or less. If the indicated clearance is between one and two feet, potholing is suggested. Metropolitan will provide a representative to assists others in locating and identifying its pipeline. Two-working days notice is requested.

k. Adequate shoring and bracing is required for the full depth of the trench when the excavation encroaches within the zone shown on Figure 4.

l. The location of utilities within Metropolitan's fee property and/or easement shall be plainly marked to help prevent damage during maintenance or other work done in the area. Detectable tape over buried utilities should be placed a minimum of 12 inches above the utility and shall conform to the following requirements:

1) Water pipeline: A two-inch blue warning tape shall be imprinted with:

"CAUTION BURIED WATER PIPELINE"

2) Gas, oil, or chemical pipeline: A two-inch yellow warning tape shall be imprinted with:

"CAUTION BURIED _____ PIPELINE"

3) Sewer or storm drain pipeline: A two-inch green warning tape shall be imprinted with:

"CAUTION BURIED _____ PIPELINE"

4) Electric, street lighting, or traffic signals conduit: A two-inch red warning tape shall be imprinted with:

"CAUTION BURIED _____ CONDUIT"

5) Telephone, or television conduit: A two-inch orange warning tape shall be imprinted with:

"CAUTION BURIED _____ CONDUIT"

m. Cathodic Protection requirements:

1) If there is a cathodic protection station for Metropolitan's pipeline in the area of the proposed work, it shall be located prior to any grading or excavation. The exact location, description and manner of protection shall be shown on all applicable plans. Please contact Metropolitan's Corrosion Engineering Section, located at Metropolitan's F. E. Weymouth Softening and Filtration Plant, 700 North Moreno Avenue, La Verne, California 91750, telephone (714) 593-7474, for the locations of Metropolitan's cathodic protection stations.

2) If an induced-current cathodic protection system is to be installed on any pipeline crossing Metropolitan's pipeline, please contact Mr. Wayne E. Risner at (714) 593-7474 or (213) 250-5085. He will review the proposed system and determine if any conflicts will arise with the existing cathodic protection systems installed by Metropolitan.

3) Within Metropolitan's rights-of-way, pipelines and carrier pipes (casings) shall be coated with an approved protective coating to conform to Metropolitan's requirements, and shall be maintained in a neat and orderly condition as directed by Metropolitan. The application and monitoring of cathodic protection on the pipeline and casing shall conform to Title 49 of the Code of Federal Regulations, Part 195.

4) If a steel carrier pipe (casing) is used:

(a) Cathodic protection shall be provided by use of a sacrificial magnesium anode (a sketch showing the cathodic protection details can be provided for the designers information).

(b) The steel carrier pipe shall be protected with a coal tar enamel coating inside and out in accordance with AWWA C203 specification.

n. All trenches shall be excavated to comply with the CAL/OSHA Construction Safety Orders, Article 6, beginning with Sections 1539 through 1547. Trench backfill shall be placed in 8-inch lifts and shall be compacted to 95 percent relative compaction (ASTM D698) across roadways and through protective dikes. Trench backfill elsewhere will be compacted to 90 percent relative compaction (ASTM D698).

o. Control cables connected with the operation of Metropolitan's system are buried within streets, its fee properties and/or easements. The locations and elevations of these cables shall be shown on the drawings. The drawings shall note that prior to any excavation in the area, the control cables shall be located and measures shall be taken by the contractor to protect the cables in place.

p. Metropolitan is a member of Underground Service Alert (USA). The contractor (excavator) shall contact USA at 1-800-422-4133 (Southern California) at least 48 hours prior to starting any excavation work. The contractor will be liable for any damage to Metropolitan's facilities as a result of the construction.

8. Paramount Right

Facilities constructed within Metropolitan's fee properties and/or easements shall be subject to the paramount right of Metropolitan to use its fee properties and/or easements 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 the fee properties and/or easements, such removal and replacement shall be at the expense of the owner of the facility.

9. Modification of Metropolitan's Facilities

When a manhole or other of Metropolitan's facilities must be modified to accommodate your construction or reconstruction, Metropolitan will modify the facilities with its forces. This should be noted on the construction plans. The estimated cost to perform this modification will be given to you and we will require a deposit for this amount before the work is performed. Once the deposit is received, we will schedule the work. Our forces will coordinate the work with your contractor. Our final billing will be based on actual cost incurred, and will include materials, construction, engineering plan review, inspection, and administrative overhead charges calculated in accordance with Metropolitan's standard accounting practices. If the cost is less than the deposit, a refund will be made; however, if the cost exceeds the deposit, an invoice will be forwarded for payment of the additional amount.

10. Drainage

a. Residential or commercial development typically increases and concentrates the peak storm water runoff as well as the total yearly storm runoff from an area, thereby increasing the requirements for storm drain facilities downstream of the development. Also, throughout the year water from landscape irrigation, car washing, and other outdoor domestic water uses flows into the storm drainage system resulting in weed abatement, insect infestation, obstructed access and other problems. Therefore, it is Metropolitan's usual practice not to approve plans that show discharge of drainage from developments onto its fee properties and/or easements.

b. If water must be carried across or discharged onto Metropolitan's fee properties and/or easements, Metropolitan will insist that plans for development provide that it be carried by closed conduit or lined open channel approved in writing by Metropolitan. Also the drainage facilities must be maintained by others, e.g., city, county, homeowners association, etc. If the development proposes changes to existing drainage features, then the developer shall make provisions to provide for replacement and these changes must be approved by Metropolitan in writing.

11. Construction Coordination

During construction, Metropolitan's field representative will make periodic inspections. We request that a stipulation be added to the plans or specifications for notification of Mr. _____ of Metropolitan's Operations Services Branch, telephone (213) 250-____, at least two working days prior to any work in the vicinity of our facilities.

12. Pipeline Loading Restrictions

a. Metropolitan's pipelines and conduits vary in structural strength, and some are not adequate for AASHTO H-20 loading. Therefore, specific loads over the specific sections of pipe or conduit must be reviewed and approved by Metropolitan. However, Metropolitan's pipelines are typically adequate for AASHTO H-20 loading provided that the cover over the pipeline is not less than four feet or the cover is not substantially increased. If the temporary cover over the pipeline during construction is between three and four feet, equipment must restricted to that which

imposes loads no greater than AASHTO H-10. If the cover is between two and three feet, equipment must be restricted to that of a Caterpillar D-4 tract-type tractor. If the cover is less than two feet, only hand equipment may be used. Also, if the contractor plans to use any equipment over Metropolitan's pipeline which will impose loads greater than AASHTO H-20, it will be necessary to submit the specifications of such equipment for our review and approval at least one week prior to its use. More restrictive requirements may apply to the loading guideline over the San Diego Pipelines 1 and 2, portions of the Orange County Feeder, and the Colorado River Aqueduct. Please contact us for loading restrictions on all of Metropolitan's pipelines and conduits.

b. The existing cover over the pipeline shall be maintained unless Metropolitan determines that proposed changes do not pose a hazard to the integrity of the pipeline or an impediment to its maintenance.

13. Blasting

a. At least 20 days prior to the start of any drilling for rock excavation blasting, or any blasting, in the vicinity of Metropolitan's facilities, a two-part preliminary conceptual plan shall be submitted to Metropolitan as follows:

b. Part 1 of the conceptual plan shall include a complete summary of proposed transportation, handling, storage, and use of explosions.

c. Part 2 shall include the proposed general concept for blasting, including controlled blasting techniques and controls of noise, fly rock, airblast, and ground vibration.

14. CEQA Requirements

a. When Environmental Documents Have Not Been Prepared

1) Regulations implementing the California Environmental Quality Act (CEQA) require that Metropolitan have an opportunity to consult with the agency or consultants preparing any environmental documentation. We are required to review and consider the environmental effects of the project as shown in the Negative Declaration or Environmental Impact Report (EIR) prepared for your project before committing Metropolitan to approve your request.

2) In order to ensure compliance with the regulations implementing CEQA where Metropolitan is not the Lead Agency, the following minimum procedures to ensure compliance with the Act have been established:

a) Metropolitan shall be timely advised of any determination that a Categorical Exemption applies to the project. The Lead Agency is to advise Metropolitan that it and other agencies participating in the project have complied with the requirements of CEQA prior to Metropolitan's participation.

b) Metropolitan is to be consulted during the preparation of the Negative Declaration or EIR.

c) Metropolitan is to review and submit any necessary comments on the Negative Declaration or draft EIR.

d) Metropolitan is to be indemnified for any costs or liability arising out of any violation of any laws or regulations including but not limited to the California Environmental Quality Act and its implementing regulations.

b. When Environmental Documents Have Been Prepared

If environmental documents have been prepared for your project, please furnish us a copy for our review and files in a timely manner so that we may have sufficient time to review and comment. The following steps must also be accomplished:

1) The Lead Agency is to advise Metropolitan that it and other agencies participating in the project have complied with the requirements of CEQA prior to Metropolitan's participation.

2) You must agree to indemnify Metropolitan, its officers, engineers, and agents for any costs or liability arising out of any violation of any laws or regulations including but not limited to the California Environmental Quality Act and its implementing regulations.

15. Metropolitan's Plan-Review Cost

a. An engineering review of your proposed facilities and developments and the preparation of a letter response

giving Metropolitan's comments, requirements and/or approval that will require 8 man-hours or less of effort is typically performed at no cost to the developer, unless a facility must be modified where Metropolitan has superior rights. If an engineering review and letter response requires more than 8 man-hours of effort by Metropolitan to determine if the proposed facility or development is compatible with its facilities, or if modifications to Metropolitan's manhole(s) or other facilities will be required, then all of Metropolitan's costs associated with the project must be paid by the developer, unless the developer has superior rights.

b. A deposit of funds will be required from the developer before Metropolitan can begin its detailed engineering plan review that will exceed 8 hours. The amount of the required deposit will be determined after a cursory review of the plans for the proposed development.

c. Metropolitan's final billing will be based on actual cost incurred, and will include engineering plan review, inspection, materials, construction, and administrative overhead charges calculated in accordance with Metropolitan's standard accounting practices. If the cost is less than the deposit, a refund will be made; however, if the cost exceeds the deposit, an invoice will be forwarded for payment of the additional amount. Additional deposits may be required if the cost of Metropolitan's review exceeds the amount of the initial deposit.

16. Caution

We advise you that Metropolitan's plan reviews and responses are based upon information available to Metropolitan which was prepared by or on behalf of Metropolitan for general record purposes only. Such information may not be sufficiently detailed or accurate for your purposes. No warranty of any kind, either express or implied, is attached to the information therein conveyed as to its accuracy, and no inference should be drawn from Metropolitan's failure to comment on any aspect of your project. You are therefore cautioned to make such surveys and other field investigations as you may deem prudent to assure yourself that any plans for your project are correct.

17. Additional Information

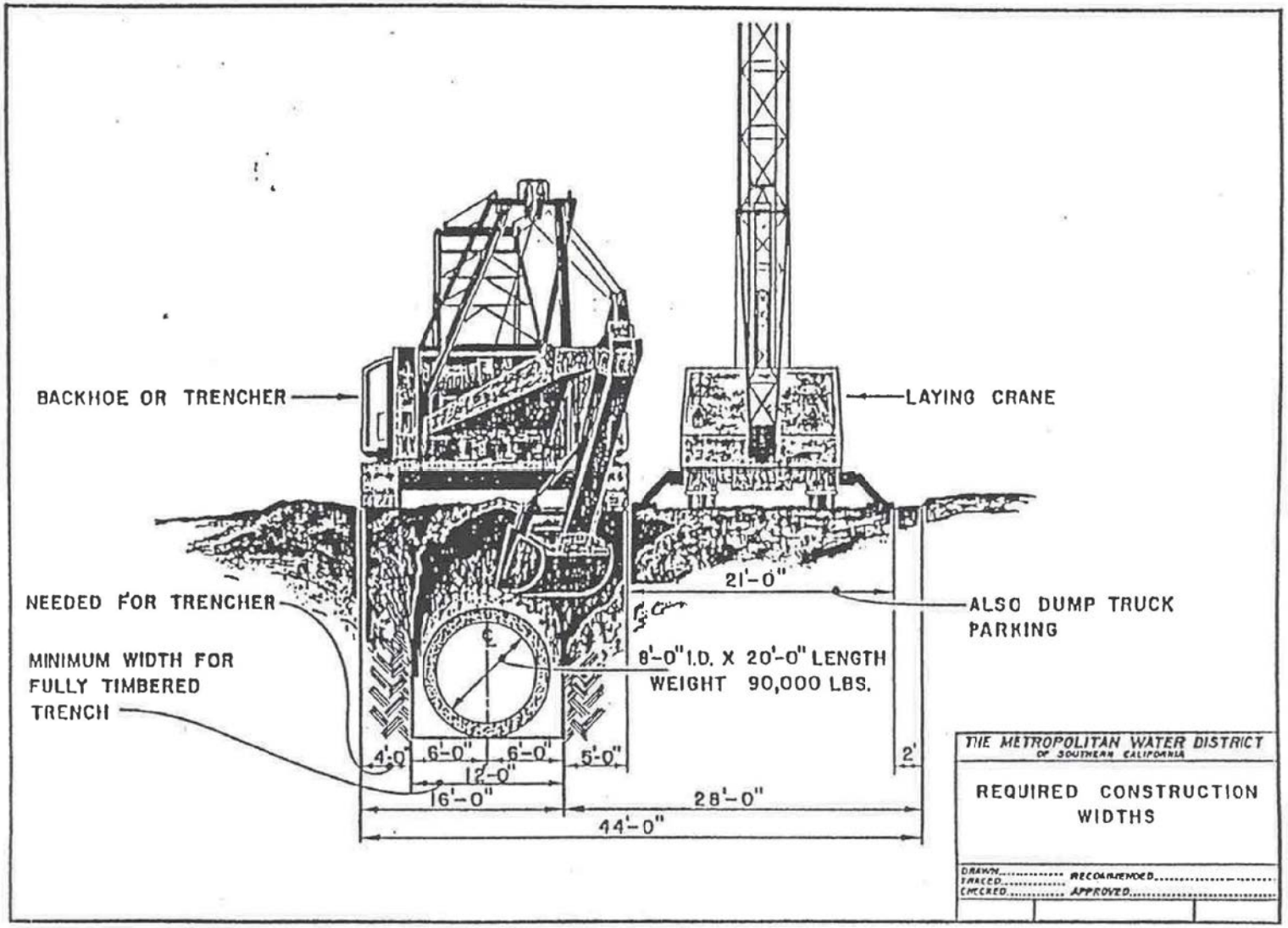
Should you require additional information, please contact:

Civil Engineering Substructures Section
Metropolitan Water District
of Southern California
P.O. Box 54153
Los Angeles, California 90054-0153
(213) 217-6000

JEH/MRW/lk

Rev. January 22, 1989

Encl.

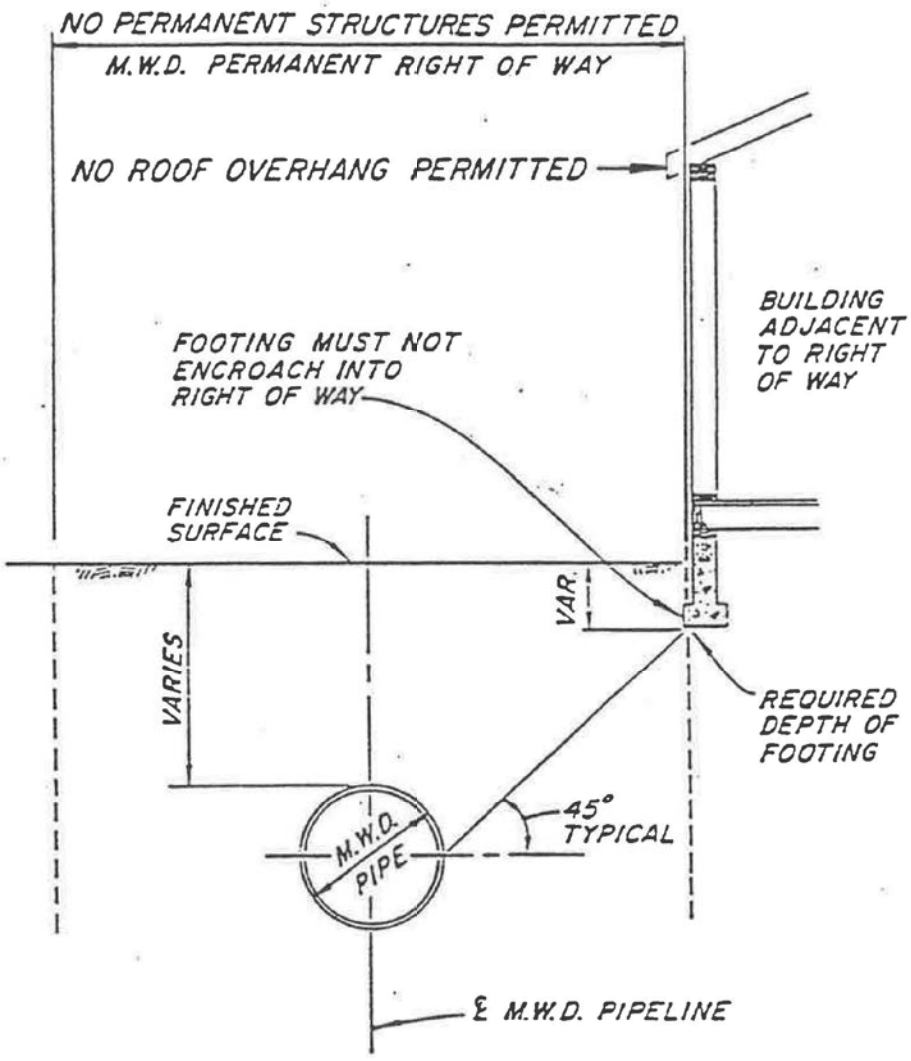


THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA

REQUIRED CONSTRUCTION
WIDTHS

DRAWN..... RECOMMENDED.....
TRACED.....
CHECKED..... APPROVED.....

FIGURE 1



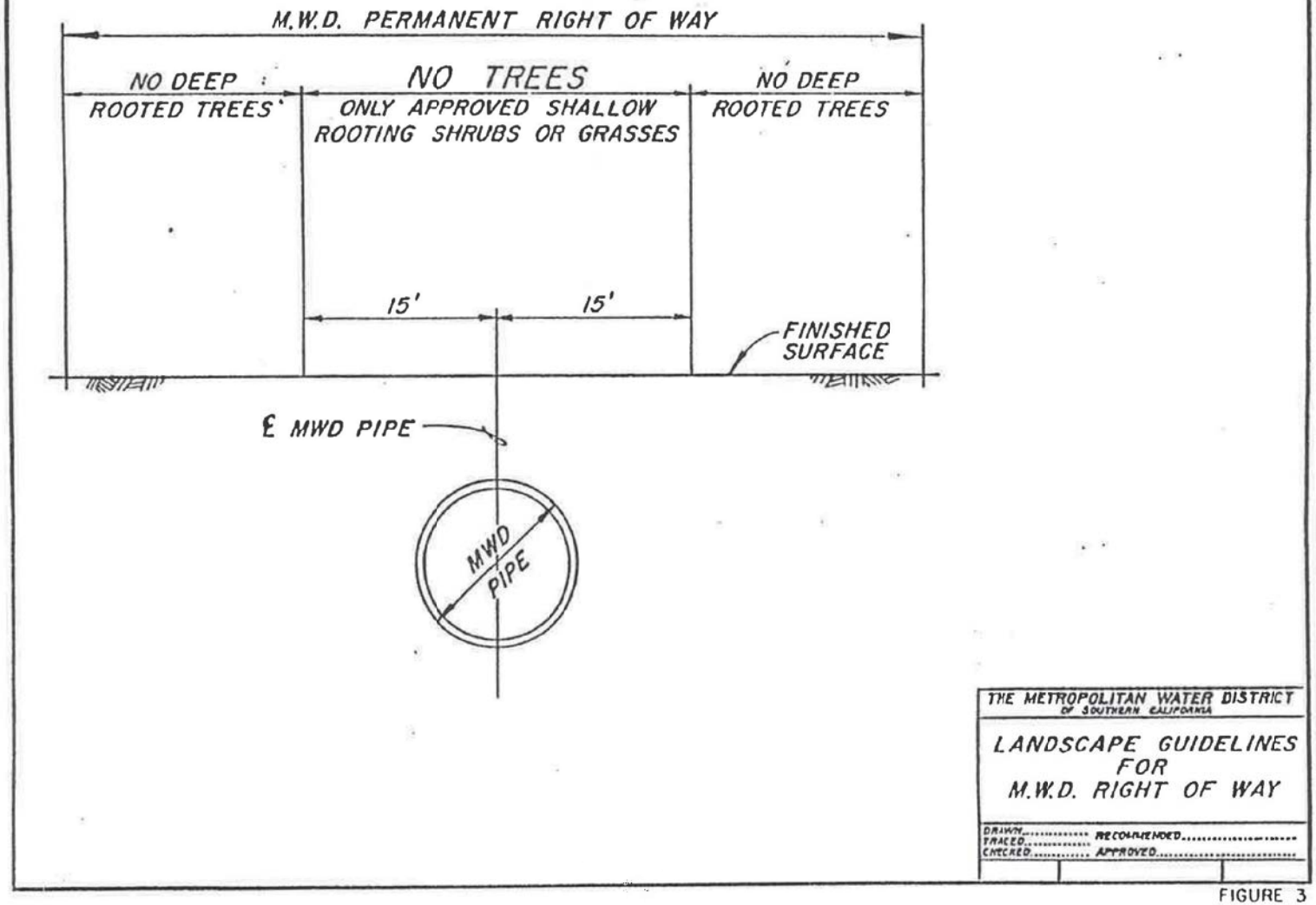
NOTE: M.W.D. PIPELINE SIZE, DEPTH, LOCATION AND WIDTH OF PERMANENT RIGHT OF WAY VARIES.

THE METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

REQUIREMENTS FOR BUILDINGS AND FOOTINGS ADJACENT TO M.W.D. RIGHT OF WAY

DRAWN _____ RECOMMENDED _____
TRACED _____
CHECKED _____ APPROVED _____

FIGURE 2



THE METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

LANDSCAPE GUIDELINES FOR M.W.D. RIGHT OF WAY

DRAWN..... RECOMMENDED.....
TRACED.....
CHECKED..... APPROVED.....

FIGURE 3

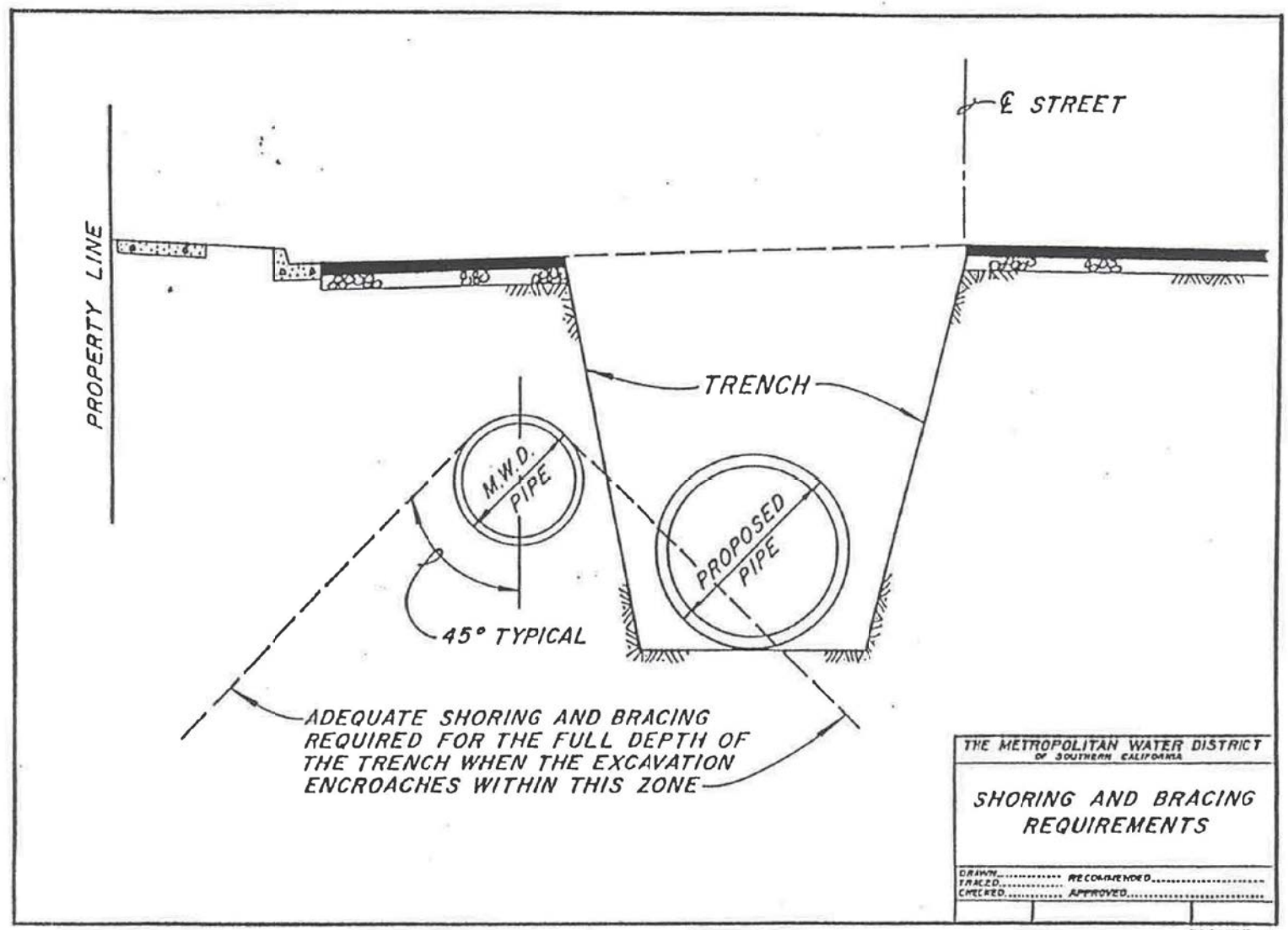
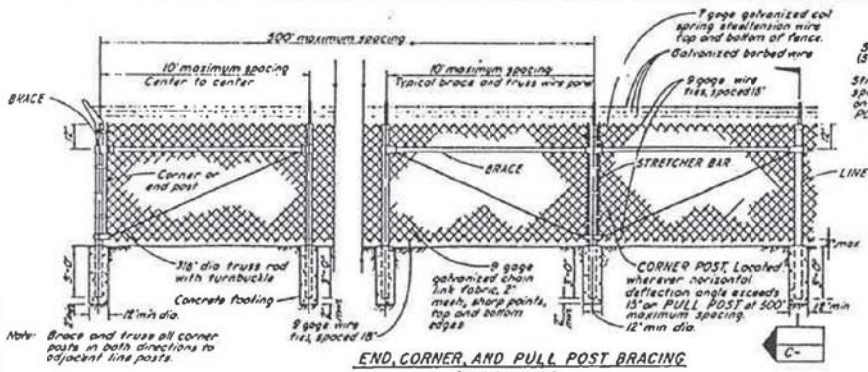
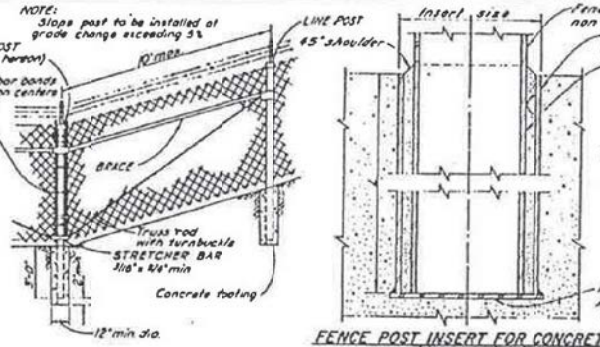


FIGURE 4

SPECIFICATIONS NO. SHEET NO.



END, CORNER, AND PULL POST BRACING
(Not to scale)



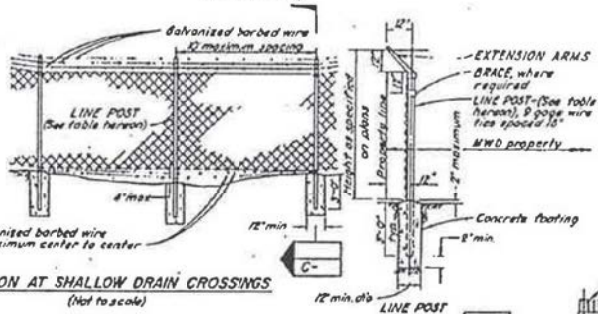
TYPICAL FENCE ON SLOPE
(Not to scale)

FENCE POST INSERT FOR CONCRETE WALL AND CONCRETE CURB
(Not to scale)

1

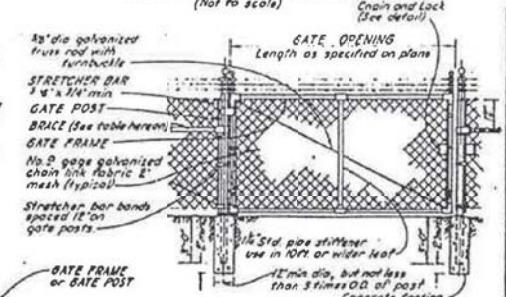
STANDARD PIPE INSERT SIZE

Post size	Insert size			
Nom O.D	Std pipe	Std pipe	Wt	L
2 1/2	2"	3 1/2	9.11	12"
3"	2 1/2"	4"	10.79	12"
4"	3 1/2"	5"	14.62	12"

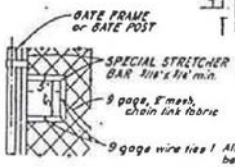


ELEVATION AT SHALLOW DRAIN CROSSINGS
(Not to scale)

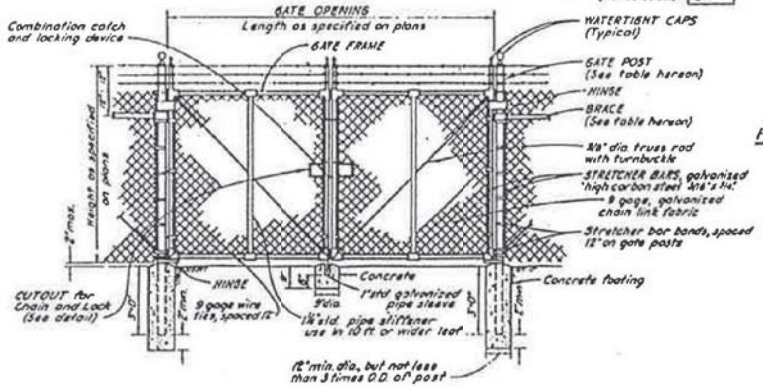
LINE POST SECTION
(Not to scale) C-



SINGLE SWING GATE DETAIL
(Not to scale)



DETAIL OF CUTOUT FOR CHAIN AND LOCK
(Not to scale)



DOUBLE SWING GATE DETAIL
(Not to scale)

GENERAL NOTES

1 All ferrous parts and materials shall be galvanized after fabrication

2 Adjustable tightening shall be turnbuckle or equivalent, having minimum 6" take-up

3 Extension arms for barbed wire shall be steel, malleable iron or wrought iron and shall be attached to the top of the post with a 3/8 inch round head rivet. The extension arms shall carry three wires each at approximately 5 inch centers in a plane approximately 45° from the vertical.

4 All gate hinges shall be heavy duty malleable iron or steel, industrial service type, 270 degree swing, of approved quality and design.

5 Secure cap to post with 3/8 inch round head rivet

Use	Type	Nominal Size (inches)	Actual O.D (inches)	Weight per foot (pounds)
End, corner, slope, pull and gate posts (for single gates 6 feet or less in width and double gates 12 feet or less in width) for chain link fabric 72" inches or higher	Pipe	2 1/2	2.875	5.79
End, corner, slope, pull and gate posts (for single gates 6 feet or less in width and double gates 12 feet or less in width) for chain link fabric less than 72 inches height	Pipe	2	2.375	3.65
Gate posts for single swing gates over 6 feet but not over 13 feet in width and double swing gates over 12 feet but not over 26 feet in width.	Pipe	3 1/2	4.000	9.11
Gate posts for single swing gates over 13 feet but not over 18 feet in width and double swing gates over 26 feet but not over 36 feet in width.	Pipe	6	6.625	18.97
Gate posts for single swing gates over 18 feet in width and double swing gates over 36 feet in width	Pipe	8	8.625	24.70
Line posts for chain link fabric 72 inches or higher	Pipe H-Section	2 2 1/2 x 1 7/8	2.375	3.65 4.10
Line posts for chain link fabric less than 72 inches in height	Pipe H-Section	1 1/4 1 1/8 x 1 1/8	1.900	2.72 2.80
Braces	Pipe H-Section Pipe	1 1/4 1 1/8 x 1 1/8 1 1/4	1.660	2.27 2.80
Frame for gates	Pipe	1 1/2	1.900	2.72
Stiffeners for gates	Pipe	1 1/4	1.660	2.27

NO.	DATE	DWN.	CKD.	REVISION	SEC.	APP.

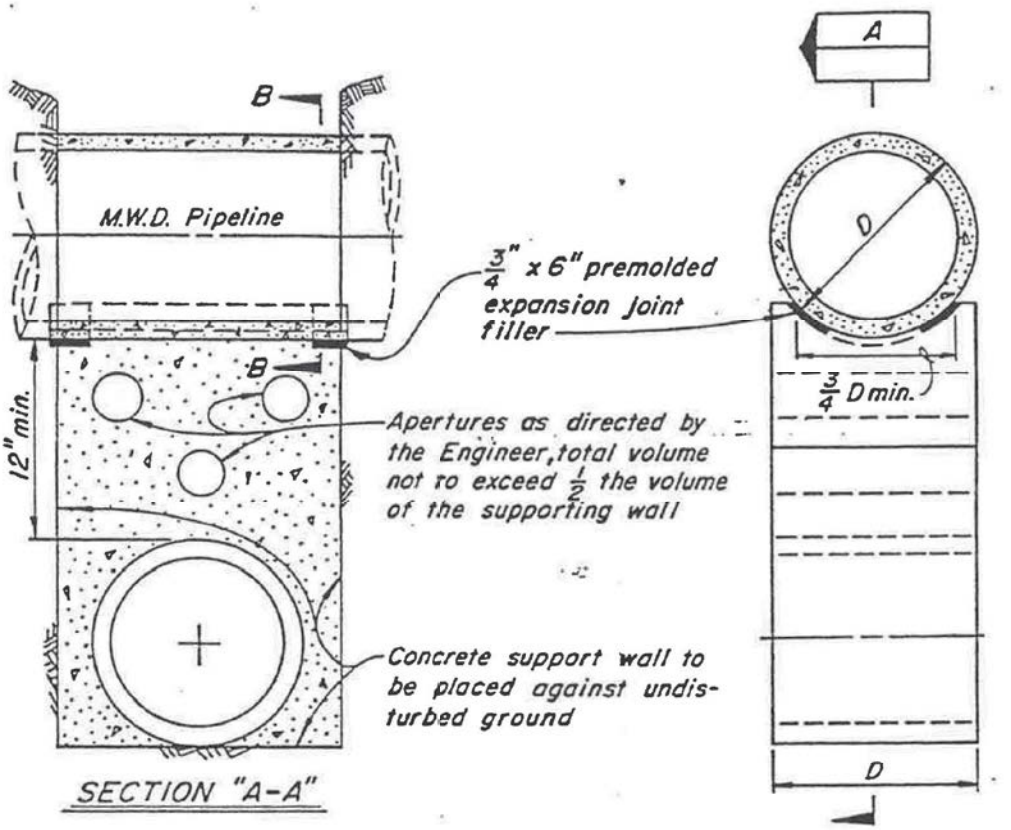
THE METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA
DISTRIBUTION SYSTEM

CHAIN LINK FENCE DETAILS

DESIGNED
DRAWN
CHECKED
WORK ORDER NO.
RECOMMENDED
APPROVED
LOS ANGELES

DIVISIONAL COORDINATION CHECK
MECH. | STRUCT. | ELEC. | CONTROL SYSTEMS | DATE
INTERDIVISIONAL COORDINATION CHECK

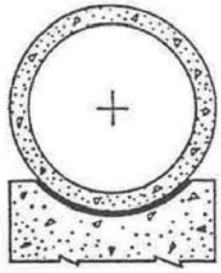
FIGURE 5



SECTION "A-A"

CROSS SECTION

1. Supporting wall shall have a firm bearing on the subgrade and against the side of the excavation.
2. Premolded expansion joint filler per ASTM D-1751-73 to be used in support for steel pipe only.
3. If trench width is 4 feet or greater, measured along centerline of M.W.D. pipe, concrete support must be constructed.
4. If trench width is less than 4 feet, clean sand backfill, compacted to 90% density in accordance with the provisions of ASTM Standard D-1557-70 may be used in lieu of the concrete support wall.



SECTION "B-B"

THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA

TYPICAL SUPPORT FOR M.W.D. PIPELINE

DRAWN _____ RECOMMENDED _____
TRACED _____
CHECKED _____ APPROVED _____

C-9547

Comment Letter 7

EASTERN MUNICIPAL WATER DISTRICT

October 13, 2016

Mr. Tom Barnes
California Department of Water Resources
626 Wilshire Blvd., Ste. 1100
Los Angeles, CA 90017

Subject: Perris Dam Emergency Release Facility

Dear Mr. Fairbanks:

COMMENT A: Eastern Municipal Water District (EMWD) thanks you for the opportunity to review the Draft Environmental Impact Report for the above-referenced project, as described in the attached California Department of Water Resources copy of EIR, received September12, 2016.

EMWD understands the proposed improvements will include constructing a water conveyance facility to connect with the Perris Valley Channel in the event DWR executes an emergency drawdown to drain the reservoir. Also being proposed is a bridge overpass on Evans Road. END COMMENT A

COMMENT B: Please note that EMWD has multiple facilities at the intersection of Ramona Expressway and Evans Road which appear to be in conflict with the proposed improvements and would require to be relocated [15-inch sewer pipeline, 16-inch recycled water pipeline, and 24-inch water pipeline]. To ensure development of the site, you must proceed with adequate considerations of EMWD's existing facilities and easements. We suggest to the project proponent, to collaborate with EMWD staff by submitting and processing a Plan Check of the proposed improvements.

The Plan Check process will help evaluate potential impacts on EMWD's facilities and identify proposed resolutions of utility conflicts. END COMMENT B Please contact Armando Arroyo, Senior Civil Engineer, Plan Check section, at (951) 928-3777 ext. 4480.

2270 Trumble Road • P.O. Box 8300 • Perris, CA 92572-8300
T 951.928.3777 • F 951.928.6177 emwd.org

If you have any questions, please feel free to call me at (951) 928-3777, extension 4450 or by e-mail at rodriguez@emwd.org.

Sincerely,

ELI RODRIGUEZ SIGNATURE
Eli Rodriguez
New Business Department
Eastern Municipal Water District
ER:emn

Tom Paulek / Susan Nash
Friends of the Northern San Jacinto Valley
P.O. Box 4036
Idyllwild, California 92549

October 14, 2016

Via: U.S. Mail (Certified)

Mr. Tom Barnes *"on behalf of"*
California Department of Water Resources
Perris Dam Emergency Release Facility Project
626 Wilshire Blvd., Ste. 1100
Los Angeles, California 90017

Re: Draft Environmental Impact Report (Draft EIR) for the proposed Perris Dam Emergency release Facility, California Department of Water Resources.

COMMENT A: We object to the California Department of Water Resources (DWR) Draft Environmental Impact Report for the Perris Dam Emergency Release Facility as individual citizens and on behalf of our conservation association the Friends of the Northern San Jacinto Valley (FNSJV). The Draft EIR disregards substantial evidence to the contrary that the Project is subject to Mandatory Finding of Significance pursuant to CEQA guideline section 15065. Consequently, the Draft EIR is able to avoid the analysis of impacts to Biological Resources and does not correctly consider the cumulative impacts of the Project on designated wildlife conservation lands and the numerous wildlife species those lands have been assigned to conserve. END COMMENT A

COMMENT B: The Draft EIR Project Description mistakenly refers to the Project site as the **"SRA Segment"** and completely ignores/disregards the prior assignment of these lands as mitigation for wildlife losses resulting from the construction of the State Water Project (Davis-Dolwig Act). The *"Memorandum of Agreement (MOA) Regarding Mitigation of State Water Project (SWP) Wildlife Losses in Southern California,"* dated October 23, 1979 is enclosed as an attachment to this comment letter. This document needs to be subjected to analysis in the Final EIR particularly as to the MOA term: *"Uses of these lands for other purposes will not be allowed if such use impinges upon the maintenance of wildlife populations, except as needed for SWP operations. If DWR requires any of these lands for SWP operations, DWR will replace such lands taken with other lands acceptable to DFG.* END COMMENT B

COMMENT C: In 1995, the lands in front of the Lake Perris Dam were included within the Stephens' kangaroo rat (SKR) "core" reserve pursuant to the federal/state Habitat Conservation Plan (SKRHCP). In 2004, the lands in front of Lake Perris Dam were

also designated under the MSHCP as conservation lands [mitigation] allowing the federal and state "take" of endangered and special status species elsewhere in western Riverside County. Under state law both the SKR and the MSHCP "take" permits were authorizes pursuant to the Natural Communities Conservation Planning Act (NCCP Act – Fish and Game Code §§ 2800-2835). Section 2826 of the NCCP Act provides: *"Nothing in this chapter exempts a project proposed in a natural community planning area from Division 13 (commencing with section 21000) of the Public Resources Code* [CEQA] *or otherwise alters or affects the applicability of that division.*

CEQA requires the identification of significant impacts to wildlife, analysis of alternatives to avoid or mitigate significant impacts, and requires the lead agency to make specific "Findings" regarding identified significant impacts to wildlife resources. The subject Draft EIR merely asserts direct, indirect, and cumulative impacts to endangered and special status species will "not be significant with mitigation" and there will be future consultation with the RCHCA or the RCA on "take" of the respective SKRHCP or MSHCP covered species. This is not CEQA compliance and the Draft EIR failure to comply with CEQA and the NCCP Act section 2826 requires explanation in the Final EIR. END COMMENT C. COMMENT D: CDFW is the state Trustee Agency for fish and wildlife resources not the RCHCA or the RCA (Fish and Game Code § 1802). END COMMENT D

COMMENT E: The prior Perris Dam Remediation Program Final EIR (November, 2011) called for the Lake Perris Outlet Tower Replacement because the existing Outlet Tower would fail in a significant earthquake. It is our understanding that this component of the Dam Remediation Program has not been funded or implemented to date. Should the present outlet tower fail/collapse as a result of a significant earthquake, a likely event given the seismicity of the project location, it would render the proposed Perris Dam Emergency Release Facility nonfunctional. In addition the subject Draft EIR indicates the Perris flood control channel cannot accommodate a 3800 cfs emergency release. DWR needs to update the public in the Final EIR regarding the status of the Outlet Tower Replacement and to what extent will failure to replace the existing Outlet Tower compromise public safety.

Thank you for the opportunity to indicate our concerns regarding this project. Please keep us informed regarding the availability of the Final EIR and any public meetings concerning this project. END COMMENT E

TOM PAULEK SIGNATURE

SUSAN NASH SIGNATURE

Tom Paulek
FNSJV, Conservation Chair

Susan Nash FNSJV,
President

Attachment: Memorandum of Agreement Regarding Mitigation of State Water Project Wildlife losses in Southern California, October 23, 1979

MEMORANDUM OF AGREEMENT REGARDING MITIGATION
OF STATE WATER PROJECT WILDLIFE LOSSES IN
SOUTHERN CALIFORNIA

This Memorandum of Agreement (hereinafter referred to as "MOA") is entered into this 23rd day of October, 1979, by and between the State of California, acting by and through its Department of Water Resources (hereinafter referred to as "DWR"), the State of California, acting by and through its Department of Fish and Game (hereinafter referred to as "DFG"), and The Metropolitan Water District of Southern California (hereinafter referred to as "Metropolitan").

Recitals

1. In accordance with the requirements of the Davis-Dolwig Act obliging DWR to preserve wildlife impacted by the construction of the State Water Project (hereinafter referred to as "SWP"), DWR, DFG, and Metropolitan have explored mitigation measures that will satisfy the preservation obligations arising out of construction of the SWP facilities on lands formerly under private ownership in Southern California. As used in this MOA "Southern California" refers to that portion of California served by the SWP southerly of the A. D. Edmonston Pumping Plant.

2. This MOA outlines the provisions to be included in definitive agreements covering the various parcels of land, sums of money, and operating agreements to carry out the preservation obligations referred to in paragraph 1.

3. The parties agree that the responsibilities for "full and close coordination of * * * planning for the preservation and enhancement of * * * wildlife" with respect to federal agencies has been previously accomplished.

Substantive Provisions

4. DWR, DFG, and Metropolitan agree to exercise their best efforts to execute definitive agreements on substantially the terms outlined in this MOA.

5. The definitive agreements shall have a term expiring on the date of expiration of the contract between DWR and Metropolitan for a water supply dated November 4, 1960.

6. The following acreage of SWP lands in Southern California shall be designated and made available for wildlife mitigation purposes. Uses of these lands for other purposes will not be allowed if such use impinges upon the maintenance

of wildlife populations, except as needed for SWP operations. If DWR requires any of these lands for SWP operations, DWR will replace such lands taken with other lands acceptable to DFG.

a.	Lake Perris	800 acres
b.	San Jacinto borrow site	650 acres
c.	Bifurcation	50 acres
d.	Peace Valley and other west branch	1,533.5 acres
	TOTAL	3,033.5 acres

Such lands shall be located approximately as shown on the maps attached hereto as Exhibit 1.

Use of any portion of the above lands included in Federal Energy Regulatory Commission (FERC) License No. 2426 for wildlife mitigation purposes will be subject to the approval of FERC.

7. Metropolitan will dedicate at Lake Mathews for wildlife mitigation purposes approximately 2,565 acres. Uses of these lands for other purposes will not be allowed if such use impinges upon the maintenance of wildlife populations, except as needed for Metropolitan's operations. If Metropolitan requires any of these lands for its operations, Metropolitan, in cooperation with DWR, will replace such lands taken with other lands acceptable to DFG. Such lands shall be located approximately as shown on the map attached hereto as Exhibit 2.

DFG will prepare a plan conceptually describing the kinds and types of habitat development it anticipates carrying out on the Lake Mathews mitigation lands. These habitat development plans, if implemented, will be financed by DFG and implemented by Metropolitan. Any habitat development must be consistent with water quality standards and the operational functions of Lake Mathews as a water supply reservoir.

8. Metropolitan will carry out the operation and maintenance functions on the habitat developments undertaken by DFG on the 2,565 acres at Lake Mathews. The maximum operations and maintenance expenditure on the lands of Lake Mathews through the term of the definitive agreements, to be reimbursed by DWR, shall not exceed $500,000. After this amount has been expended, operations and maintenance costs will be reimbursed by DFG. Personnel of Metropolitan and DFG shall meet prior to each new year to develop an annual maintenance schedule. At the end of each year, Metropolitan will prepare an annual report on its operations and maintenance activities and related expenditures.

9. DWR will provide flows in Peace Valley Creek below Quail Lake in sufficient quantities to create and maintain a riparian corridor from the closest point to the California Aqueduct outlet at Quail Lake, to a point on Gorman Creek where proposed fish enhancement is to be made (approximately two miles in length).

10. The financial obligation of DWR to DFG shall be limited to the following:

a. An interest-bearing account with a one-time cash settlement of $5.5 million, to be provided by DWR, will be established to be used exclusively by DFG for wildlife mitigation purposes. DFG shall utilize these funds for the acquisition and improvement, of lands for wildlife mitigation purposes in the San Jacinto area, or for improving and maintaining wildlife habitat on the lands acquired or designated herein for wildlife purposes.

b. DWR also agrees to provide DFG $1.5 million in SWP funds to be reimbursed through the project-purpose allocation to recreation, fish and wildlife enhancement. These funds will be deposited in the interest-bearing account established pursuant to subparagraph a.

c. DWR will assign to DFG $0.5 million of its share of allocations from the Land and Water Conservation Fund.

d. DWR and DFG will cooperate in seeking an appropriation by the Legislature of $0.5 million from the funds allocated to DWR under the State, Urban, and Coastal Park Bond Act of 1976.

11. DFG shall be lead agency in complying with the provisions of the California Environmental Quality Act in implementing any wildlife mitigation features.

12. None of the parties shall be committed to take steps which require CEQA compliance until an opportunity has been provided them to consider and take such action as they, in their discretion, deem desirable based on any relevant CEQA documentation.

13. The definitive agreements shall be submitted by the parties to those agreements to all other interested non-federal agencies in such manner as to assure compliance with Section 11910 of the Water Code.

STATE OF CALIFORNIA
DEPARTMENT OF WATER RESOURCES

By _____
Director

STATE OF CALIFORNIA
DEPARTMENT OF FISH AND GAME

By COPY ORIGINAL SIGNED BY E. C. FULLERTON
Director

Approved as to legal form and sufficiency:

P. A. Towner
Chief Counsel, Department of Water Resources

THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA

By _____
General Manager

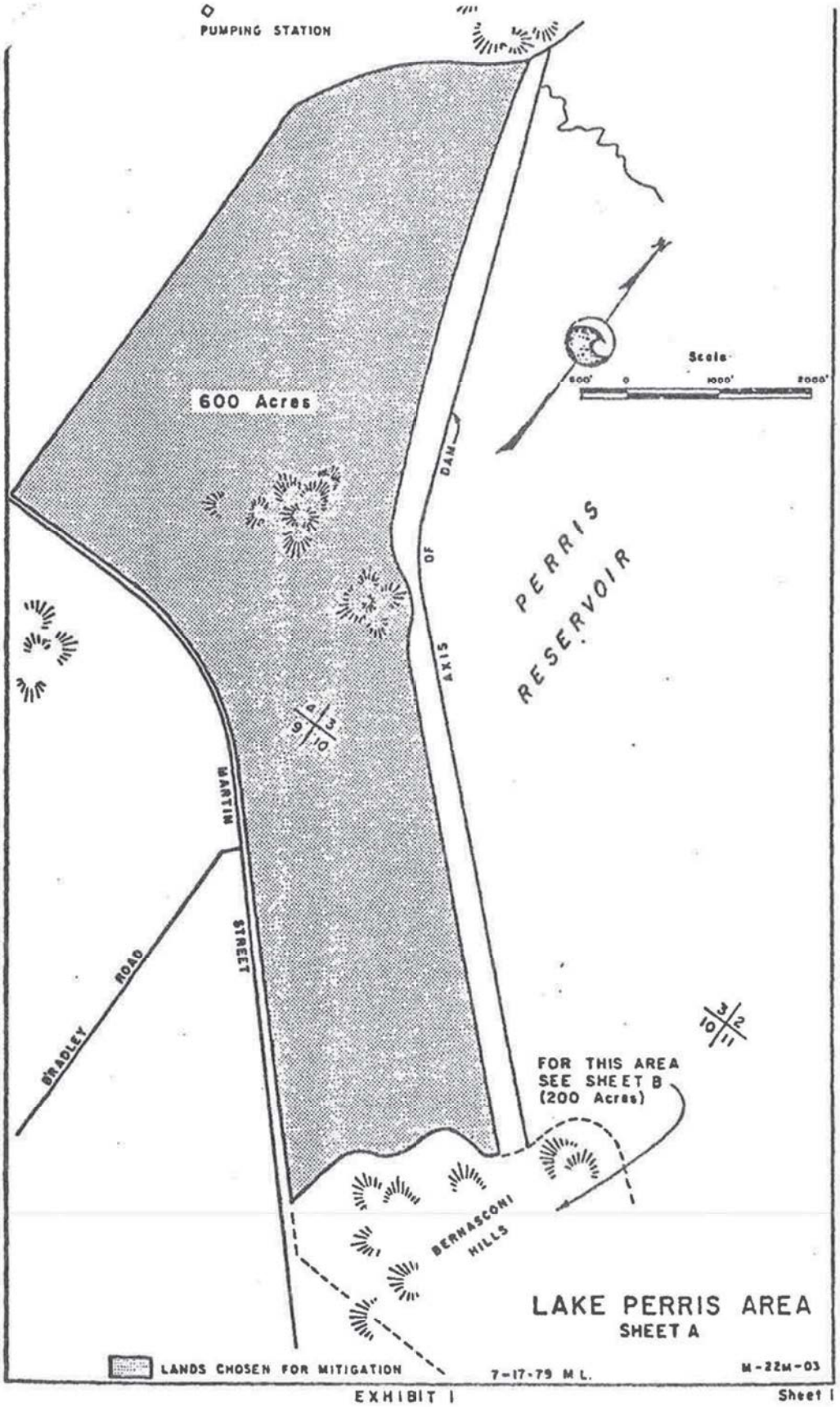


EXHIBIT I

Sheet 1

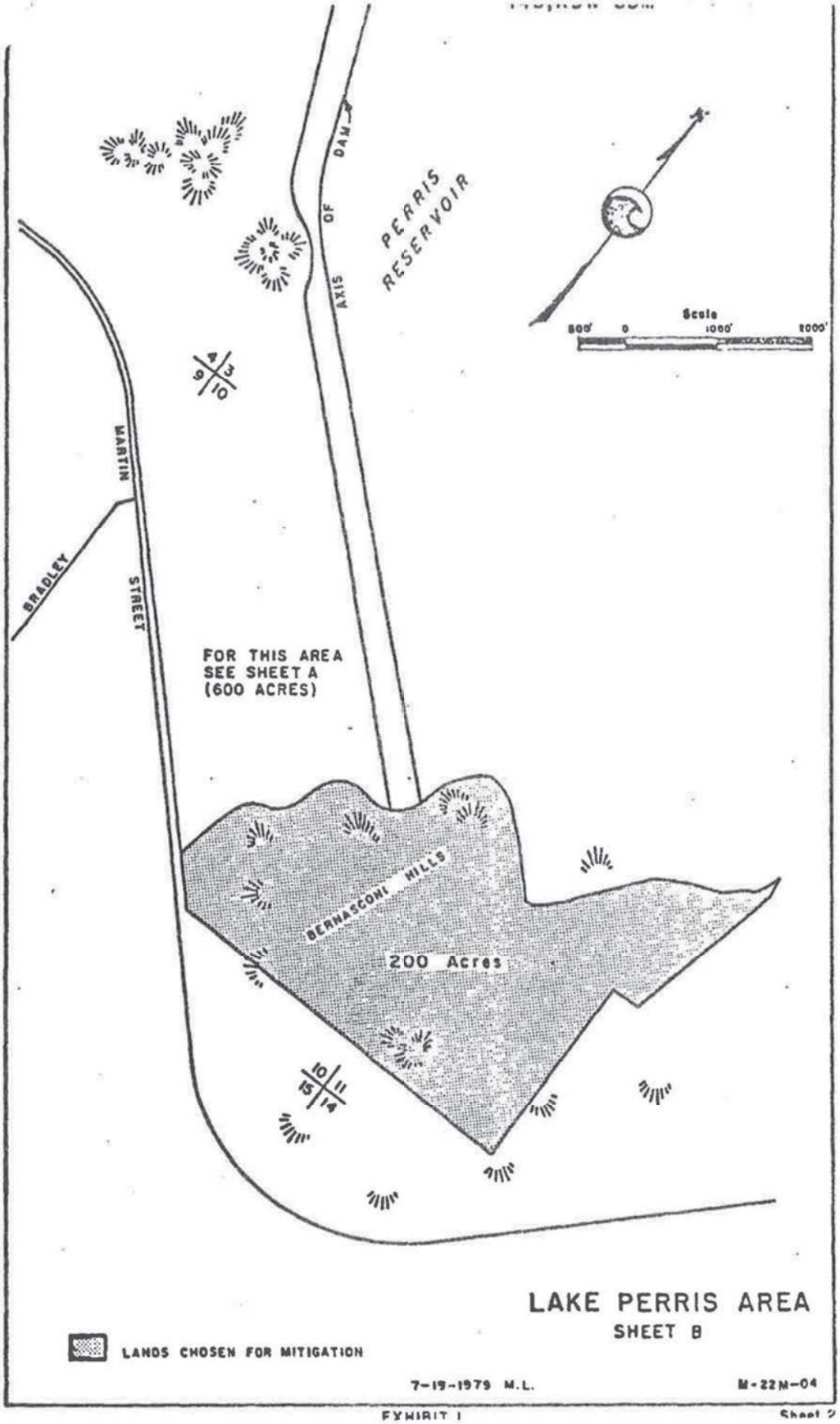


EXHIBIT 1

Sheet 2

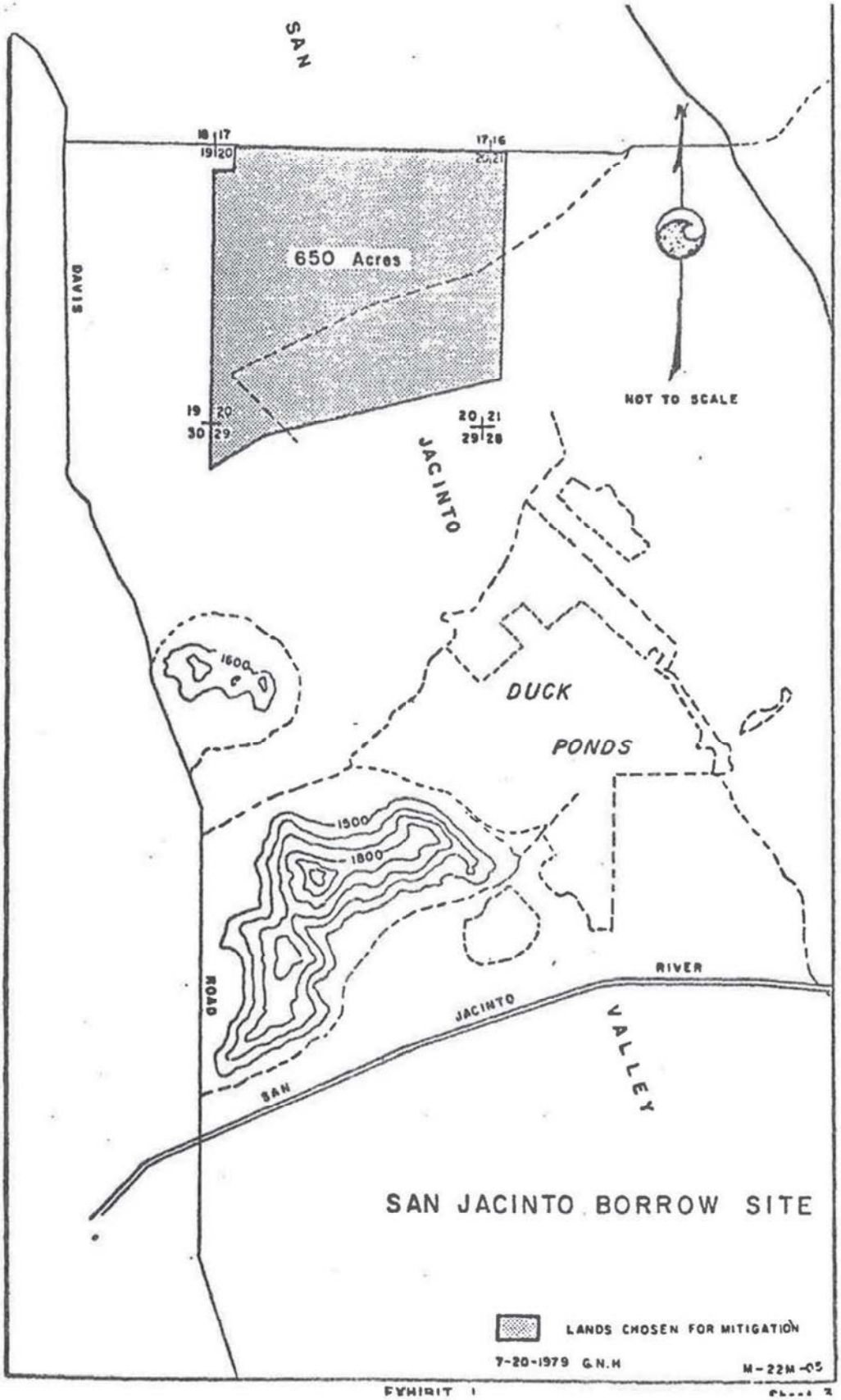

SAN
650 Acres
DAVIS
NOT TO SCALE
JACINTO
DUCK
PONDS
1600
1500
1800
ROAD
RIVER
JACINTO
VALLEY
SAN
SAN JACINTO BORROW SITE
LANDS CHOSEN FOR MITIGATION
7-20-1979 G.N.H
M-22M-05

EXHIBIT 1

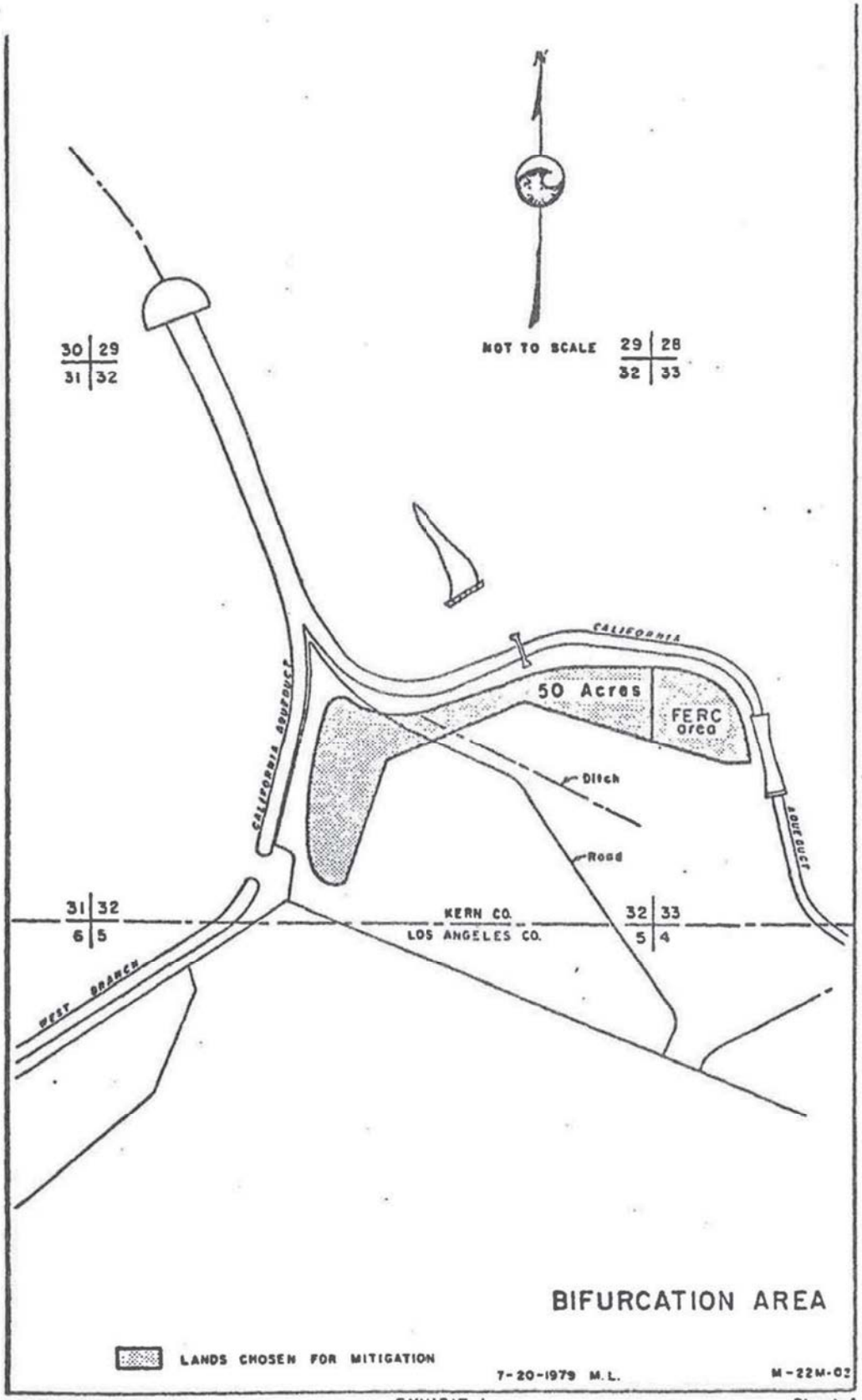


EXHIBIT 1

Sheet 4

T8N, R18W SBM LOS ANGELES CO.

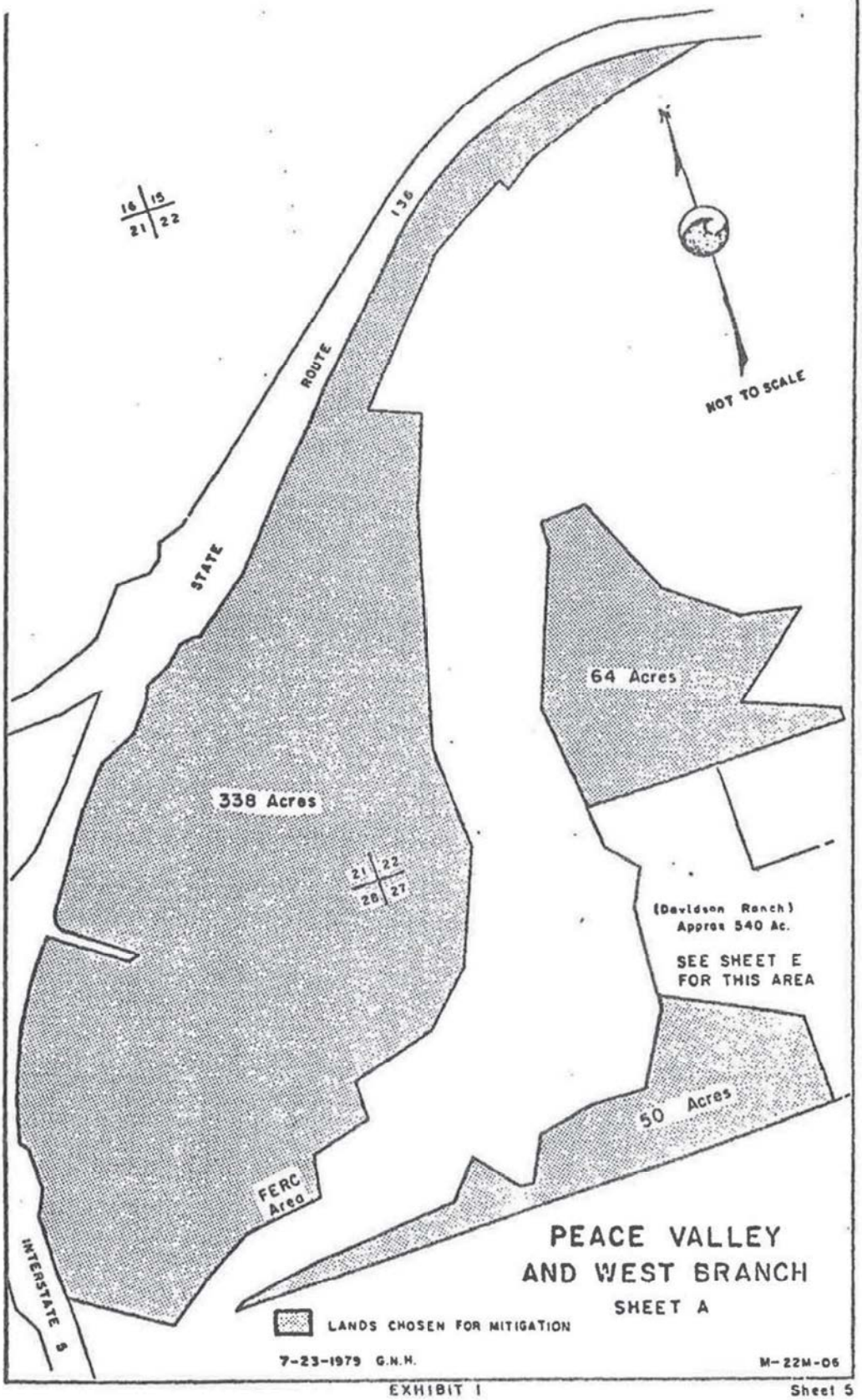


EXHIBIT 1

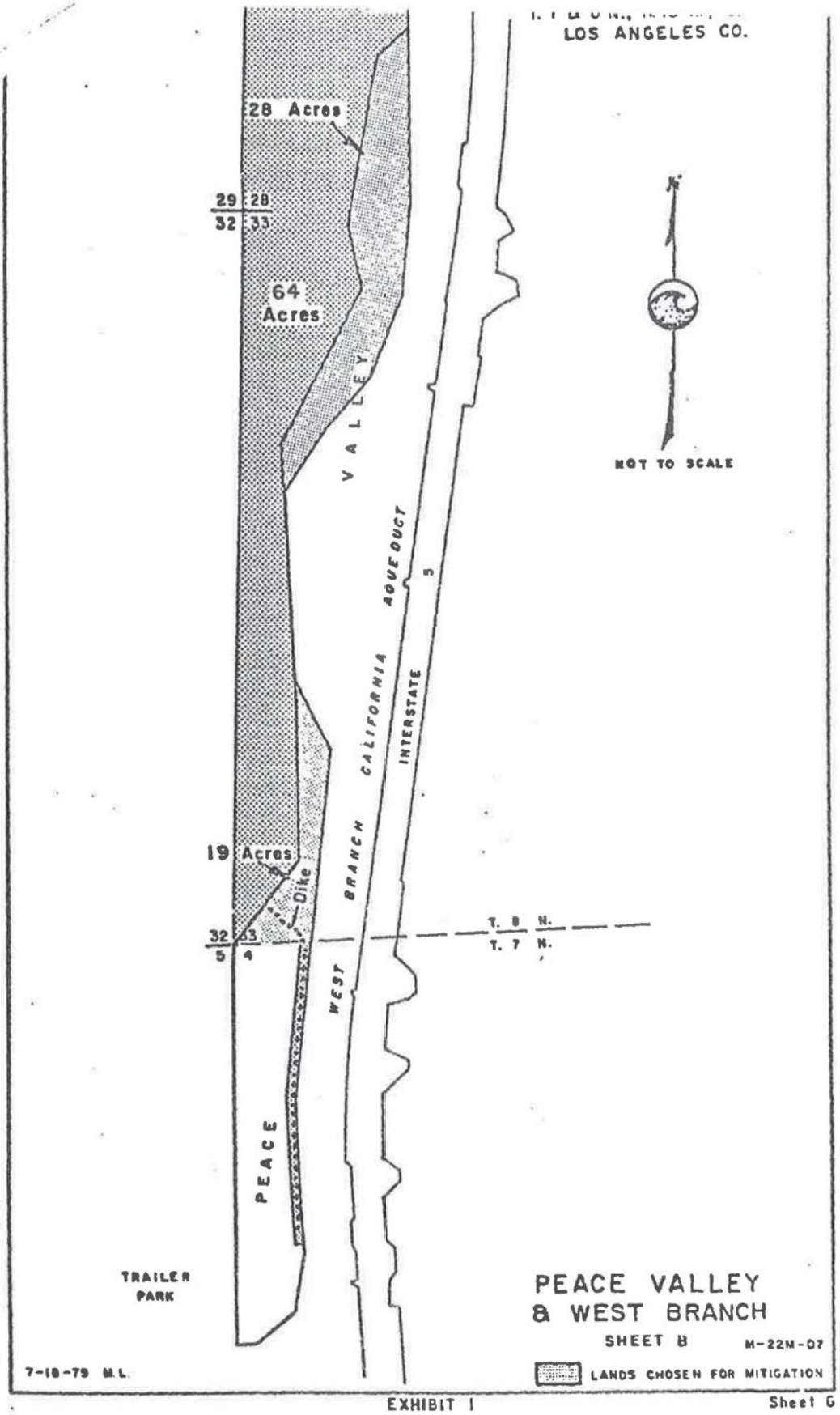


EXHIBIT I

Sheet 6

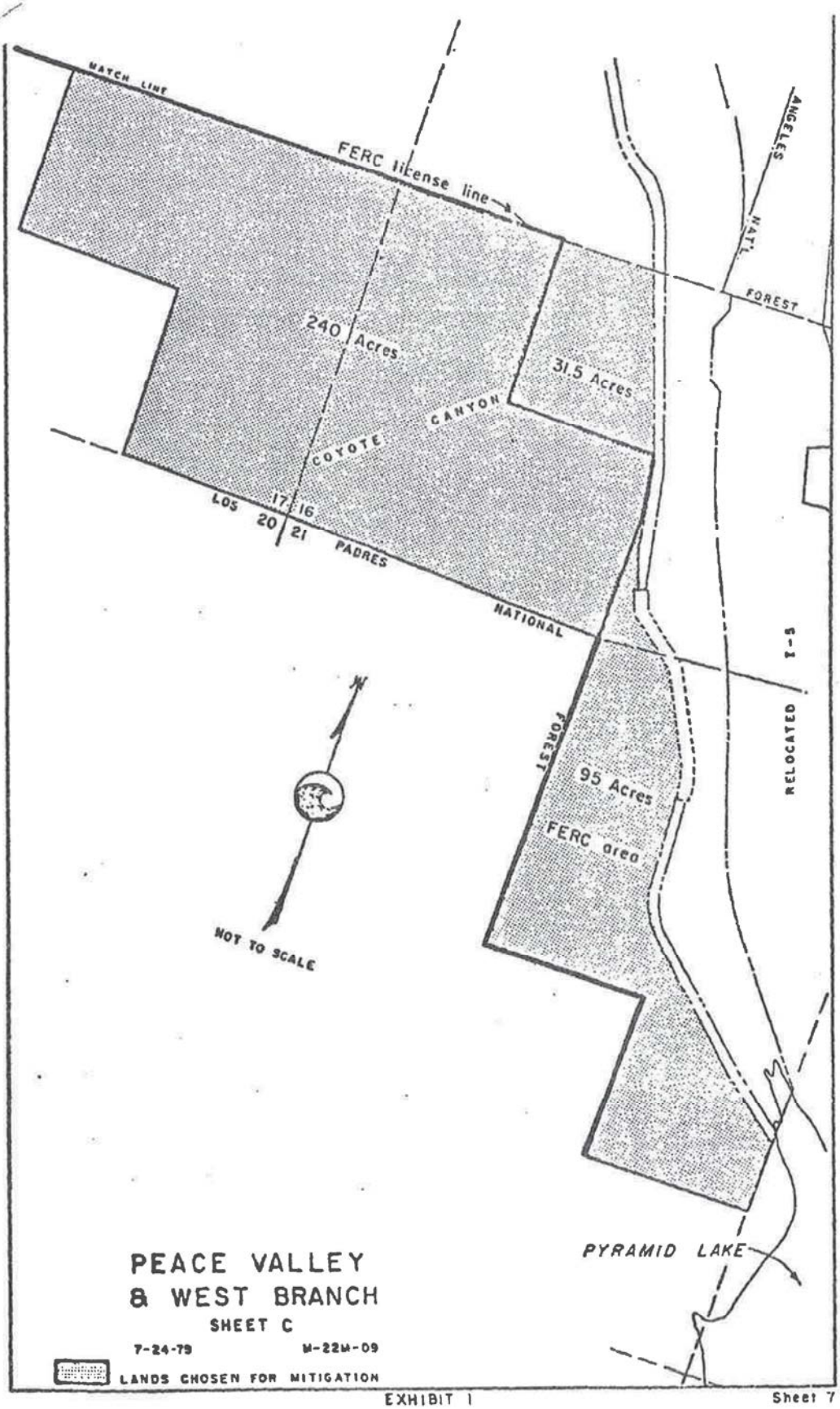
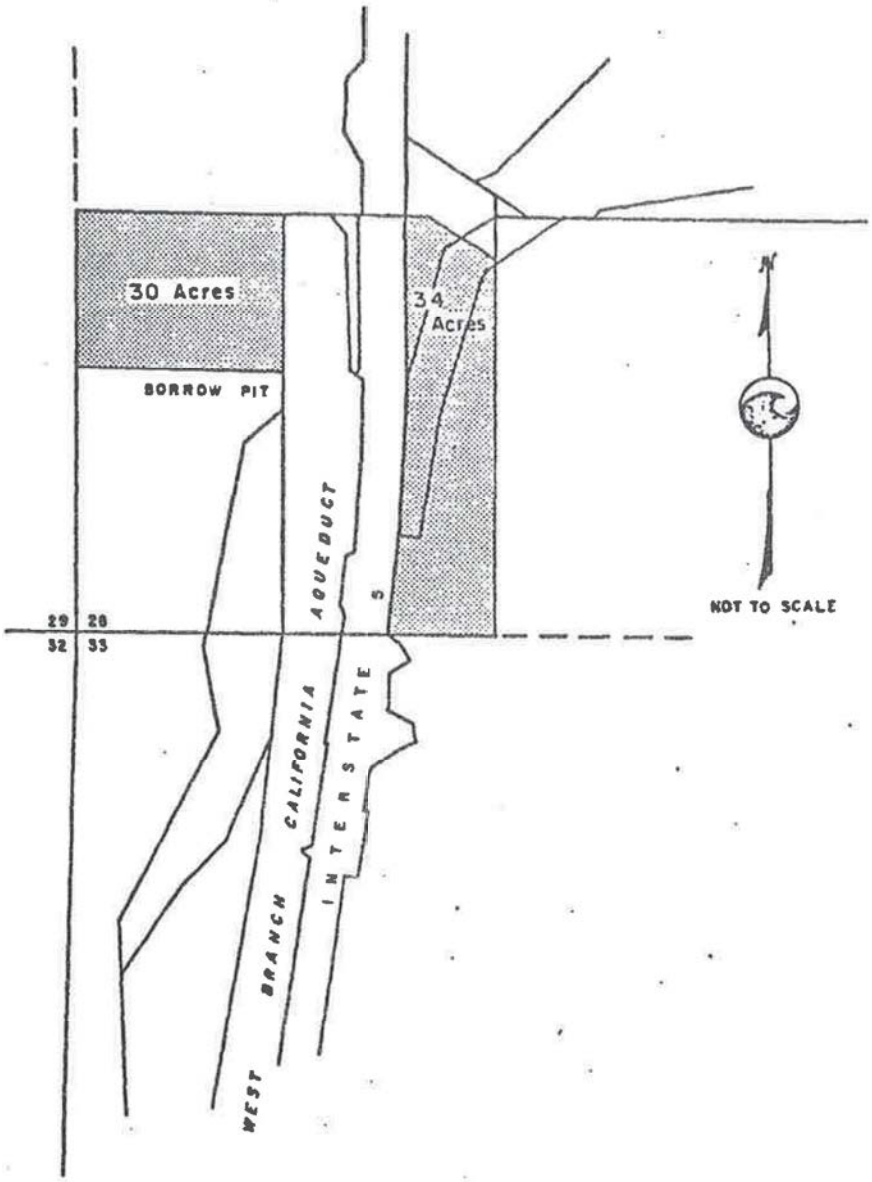

MATCH LINE
FERC license line
ANGELES
NAT'L
FOREST
240 Acres
31.5 Acres
COYOTE
CANYON
17
16
LOS
20
21
PADRES
NATIONAL
FOREST
95 Acres
FERC area
RELOCATED I-5
NOT TO SCALE
PYRAMID LAKE
PEACE VALLEY
& WEST BRANCH
SHEET C
7-24-79
M-22M-09
LANDS CHOSEN FOR MITIGATION

EXHIBIT 1



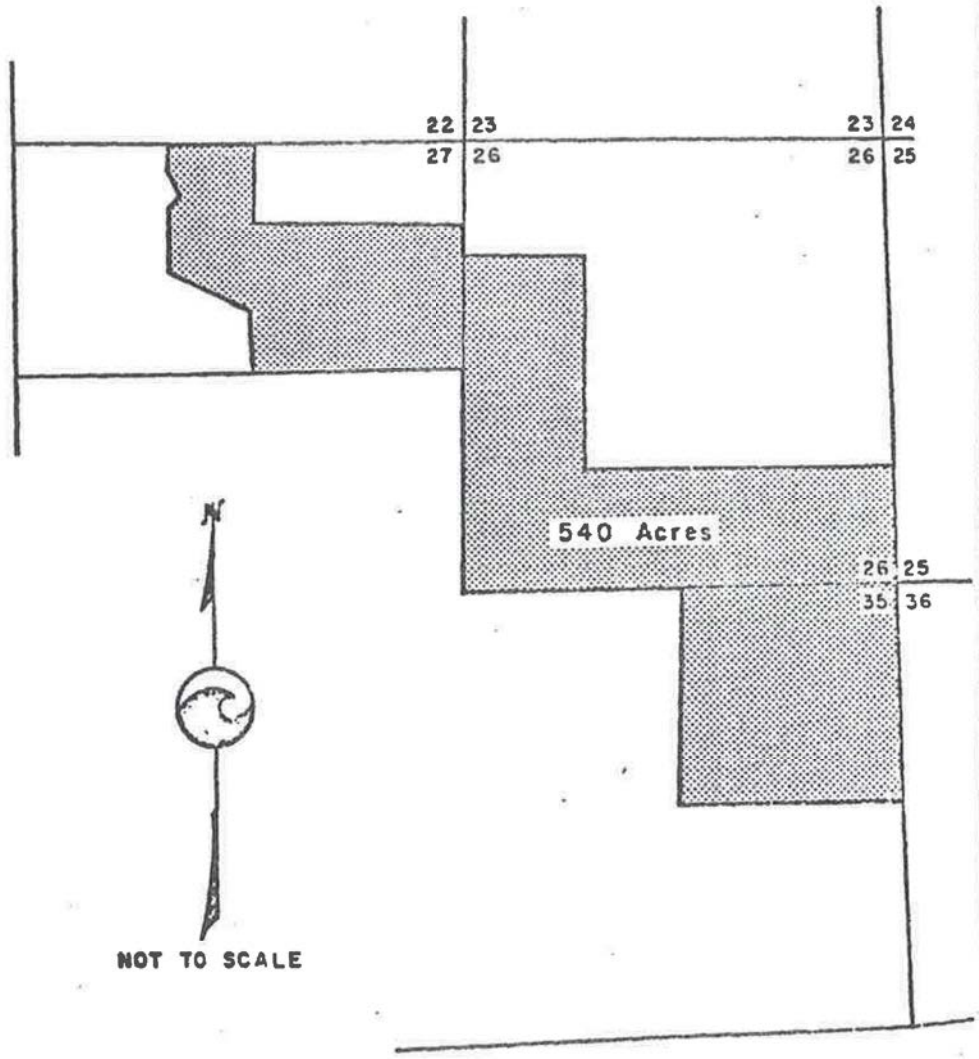
PEACE VALLEY
& WEST BRANCH
SHEET D

LANDS CHOSEN FOR MITIGATION

8-9-79 M.L.

EXHIBIT I

T. 8 N., R. 18 W., S. B. M., LOS ANGELES CO.

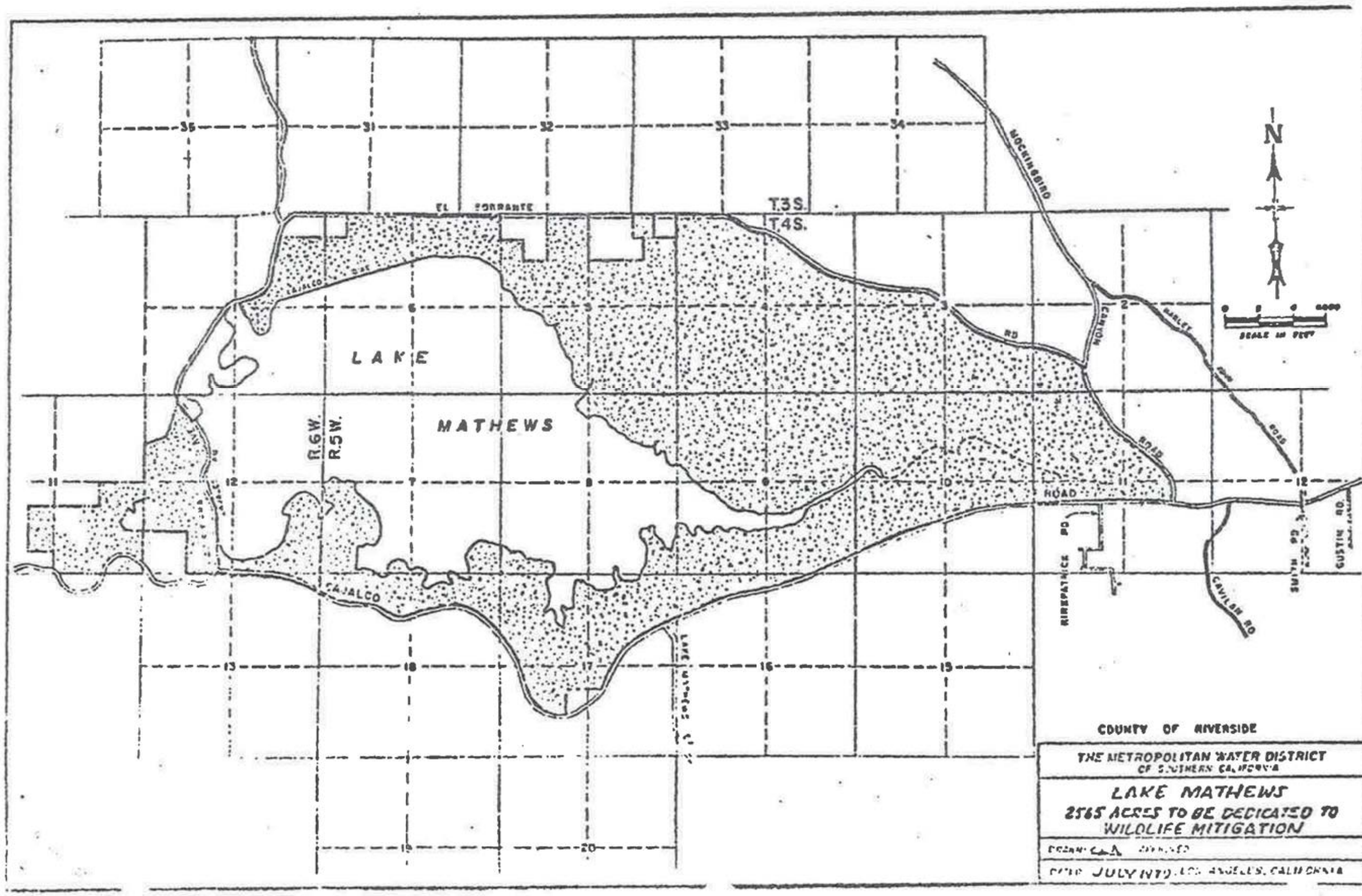


PEACE VALLEY
& WEST BRANCH
SHEET E

LANDS CHOSEN FOR MITIGATION

8-9-79 M-22M-14

EXHIBIT 1 Sheet 9


LAKE MATHEWS
T3S.
T4S.
R.6W.
R.5W.
EL SOBRANTE
MOCKINGBIRD
CANYON
RD
ROAD
CAJALCO
CAVILAN RD
KIRKPATRICK RD
GUSTIN RD.
SCALE IN FEET
N
COUNTY OF RIVERSIDE
THE METROPOLITAN WATER DISTRICT
LAKE MATHEWS
2565 ACRES TO BE DEDICATED TO
WILDLIFE MITIGATION

COMMENT LETTER NO. 9

Lake Perris Fairgrounds

STATE OF CALIFORNIA
46th District Agricultural Association
18700 Lake Perris Drive • Perris, California 92571

California Department of Water Resources
C/O Tom Barnes, ESA
626 Wilshire Boulevard, Ste. 1100
Los Angeles, California 90017

RE: Draft Environmental Impact Report, Perris Dam Emergency Release Facility

COMMENT A: The 46th District Agricultural Association (Southern California Fair) would like to thank you for the opportunity to review the Department of Water Resources "Draft" Environmental Report for the proposed Perris Emergency Release Facility as it may apply and impact the proposed property of the 46th District Agricultural Association.

The Notice of Preparation identifies the fairgrounds as Perris Fairgrounds, for point of record the official information regarding the fairgrounds is the following; 46th District Agricultural Association is owned and operated by the State of California, directed by California Department of Food and Agriculture and is a Division of Fairs and Expositions. We operate (doing business) under the name of Southern California Fair and Lake Perris Fairgrounds.

EIR and Master Plan for the fairgrounds were adopted and approved by appropriate +parties in 1990. This includes the operation of annual fair, non-fair activities and events such as but not limited to (horse and livestock shows, motocross, auto racing, concerts, rodeos and others. The EIR also addressed major impacts on the environment, which included public facility utilities, flooding, drainage, geological hazards capabilities with surrounding land use and impacts of noise, light, glare, traffic and other reportable and required Environment Impact Reports.

The 46th District Agricultural Association shall reply to the "Draft" EIR in two manners, first will be the comments submitted on the Notice of Preparation March 9th, 2014, with any amendments to the comments highlighted in yellow, secondly identification of new concerns and comments to the EIR will added as amended and identified this date.

COMMENTS PREVIOUSLY SUBMITTED (MARCH 9th, 2014)

The 46th District Agricultural Association its lease holders and annual fair will be significantly disturbed, impacted, events disrupted and economic malaise generated and created by the "Proposed Emergency Release Outlet" and all associated land acquisition, construction and bridge placements.

The events impacted with the following annual attendance are:

1. Motocross (est. 1991) 72,500
2. Perris Auto Speedway (est. 1996) 92,256
3. El Toro Huaco (est.1992) (Hispanic Rodeo, Concerts) 148,500
4. Go-kart Track (est. 1999) 35,050
5. BMX (bicycle track) 30,000
6. California Department of Agriculture no public 4,000
7. Circus 12,000
8. Equestrian Shows 1,000
9. Livestock Demonstration 1,000
10. Dog Shows 2,750
11. Car Shows 15,000
12. Concerts 5,000
13. Community groups 2,500
14. Main office meetings 1,500
15. Home Show 10,000
16. Cell tower lease no public
17. Motorcycle training 3,500
18. Multiple practice events 10,000
19. Camping at various events 7,500

Operated and owned by the fair

1. *Southern California Fair 113,500*
2. *Lake Perris Sports Pavilion 62,000*
3. *Harrison Hall 27,500*

The 46th District Agricultural Association will identify and provide our analysis of the significant impacts to the fair, fairgrounds, lease holders, attendees, stakeholders and guests that utilize, visit and make a living, provide education, entertainment, showcase their products and sell from the fairgrounds. END COMMENT A

1. **Land acquisition-**

COMMENT B: Any and all significant changes in the property will result in domino affect that may cause a reconfiguration of event locals (motocross, parking, hispanic rodeos, perris auto speedway and concerts with funds required to accomplish. Additionally, the fair market value of any land acquisition must include the economic impact, business

interruption, and financial impact to the fair, lease holders, stakeholders and their business partners. The business interruption has impacted the fairgrounds as the motocross track recently closed due to impending emergency release plans. END COMMENT B

2. **Primary parking-**

   COMMENT C: Proposed options include the acquisition of some primary parking for the emergency release outlet. This will impact multiple events with land alterations and traffic changes. END COMMENT C

3. **COMMENT D: Engineering review-**

   The fair has had engineering firm of Webb and Associates review the current proposals by DWR that was provided to DWR. END COMMENT D

4. **COMMENT E: Destination site-**

   Each event whether related to car, motorcycles, bicycles, go karts, concerts, fair, home shows, is driven by vastly different attendees and requires separate marketing strategies and expenditures to maximize their attendance. Interruption in ingress and egress would disrupt the integrity of each event, impact attendance and revenue streams to the vendors and the fair that may not be recoverable. END COMMENT E

5. **Construction phase:**

   COMMENT F: Construction is scheduled to begin 2017 shall include the emergency release outlet (ditch) which will interrupt and significantly impact attendance and revenue streams all the aforementioned lease holders, fair, off track wagering with traffic ingress and egress problems and situations daily. This phase will last in excess of two years.

Construction scheduling should include the nature of business's and the calendar months that they operate the most. END COMMENT F

6. **COMMENT G: Bridge construction:**

Bridge construction identified required by DWR as a bridge over the emergency release outlet ditch connecting to Lake Perris Drive which provides entrance into fairgrounds and Lake Perris. Additional consideration design and construction must factor and include the size of vehicles and hauling of race cars, livestock trailers, concessionaire trailers, horse trailers, campers and motorhomes with specific loads, vehicle sizes and radius required to accommodate vehicles. END COMMENT G

7. **COMMENT H: Bridge Gate A Fairway Drive (Avalon Dr)-**

Fairway Drive has been identified by the District to DWR that an additional "bridge" must be located at Fairway Drive to continue operations, ingress and egress for motocross, Perris auto speedway, Hispanic rodeo and concerts, fair exhibitors and egress for fair patrons. Additionally, the design of the bridges must incorporate and accommodate the large vehicles and vehicles that haul race cars, concessionaire trailers, livestock and horse trailers. END COMMENT H

8. **COMMENT I: Department of General Services-**

The 46th District Agricultural Association has initial discussions with their personnel as they should be involved in any land acquisition on State of California property or other significant agreements regarding State of California property. END COMMENT I

9. **COMMENT J: Safety-**

Safety is of utmost concern to the District and we're confident that DWR and associated contractors will take all precautionary steps to protect the fairgrounds it's guests, stakeholders, children however there is significant exposure and risks with the open ditch. Additionally fairgrounds has thousands of children crossing the property. END COMMENT J

10. **COMMENT K: Motocross-**

Motocross may be the most directly impacted lease holder on the property with proposed land acquisition, redesign and alteration of the current motocross track. Principal owner and operator Mr. Mark Peters (premier track designer and builder in the world) states that altering and or minimizing the land, changing the track design of the motocross track would "bankrupt" them. The comments provided in March of 2014 identified and predicted the closure of motocross, however the fairgrounds did not anticipate motocross closing prior to the beginning of construction and subsequently the significant loss of revenue is occurring due to the pending construction. END COMMENT K

11. **COMMENT L: Perris Auto Speedway-**

Perris Auto Speedway has provided their comments and observations regarding the emergency release outlet directly to Department of Water Resources. END COMMENT L.

12. **COMMENT M: Department of Food and Agriculture/Division of Fairs and Expositions-** The 46th DAA is governed and operated by the State of California, thru the direction of California Department of Food and Agriculture, and the Division of Fairs and

Expositions. The 46th DAA has provided information contacts and introduced DWR personnel to Division of Fairs and Exposition key personnel to begin conversation by and between State agencies to better resolve the of State of California. END COMMENT M

13. **COMMENT N: Electronic message center-**

Electronic message center may need to be relocated for the emergency release outlet, concern and impact would be significant if the message center was relocated a greater distance from Ramona expressway. Larger and more visible message center may be required to maintain the same visual impressions. END COMMENT N

14. COMMENT O: **Sewer lift station-**

The lift station and primary sewer line may be relocated within the emergency release outlet will require additional review and study. END COMMENT O

15. **COMMENT P: Construction work schedule-**

If in fact that construction is ongoing on the fairgrounds and bridge consideration should be given for the somewhat seasonal nature of business's on the property with prime ingress and egress of activities defined with fair and fairground renters. END COMMENT P

16. COMMENT Q: **Economic Impact of lease holders-**

The economic impact of construction, closing points of primary entrance to the fairgrounds will significantly impact each event by less paid gate fees and attendance, less spending on food and beverage, less funding paid to vendors, less parking revenues, less spin off spending and subsequently less revenue generated and paid to 46th DAA. Analysis indicates that this may in the ranges of 30% to 50%.

Less revenue to the lease holders and paid to the fairgrounds, the larger revenue generating leases are smaller flat fees with percentages paid to fair will be significant less. END COMMENT Q

17. **COMMENT R: Satellite Wagering (off track wagering)-**

Satellite Wagering is a generational sport with a larger share of the audience and attendees being older demographics, any changes at the facility including ingress and egress of the access to the fairgrounds and facility would disrupt their patterns and result in decreased attendance, funds wagered, decreased revenues to the fair. END COMMENT R

18. **COMMENT S: Business Interruption-**

Interruption of business to the lease holders and the fair will be significant during the two year construction period. Analysis and comments from lease holders indicate that loss of business and revenue may exceed 50%. This will result in significant decrease of income paid by lease holders to the fair. END COMMENT S

19. **COMMENT T: Economic Impact-** Perris Valley Area

Annual fair and non-fair activities generate millions of dollars into the community in the way of employment, restaurants, gas and motels not to mention the business that are supported by the events. The estimates may be in excess of 8 million for the annual fair and another 10 million for the non-fair lease activities. Any significant disruption in these events will have a major impact that will cause economic worsening by the vendors and Perris area business owners and operators. END COMMENT T

20. **COMMENT U: Southern California Fair-**

The fair is annually held in October and attendees exceed well over 100,000 visitors. The mission of the annual fair is "Provide for the education, entertainment and presentation of youth livestock and exhibits". The annual budget for the fair approaches One million dollars for operational expenditures with a large economic impact to the Perris area. Additionally, the fair like most business in the past years the fair proper is in a rebuilding mode and any changes to this would cause significant damage and lessen attendance and revenue.

Also, the fair provides (sells) locations to hundreds of vendors (food, commercial vendors) who sell their food, beverage and wares to the attendees, any decrease in attendance due to construction will result in significant reduction in sales for the fair and subsequent decrease of income to the fair.

Rebuilding the vendor base due to the aforementioned would be difficult if not impossible with the fair industry. END COMMENT U

21. COMMENT V: Summary-

The fairgrounds and all lease holders have annual attendance over 700,000 people visiting or attending multiple events located on the fairgrounds proper. The "destination facility" (fairgrounds) proposed changes to the property by DWR scope of work for an emergency release outlet will dramatically and significantly have a direct economic and indirect economic impact to the fair, lease holders, guests, visitors, participants and stakeholders.

The economic instability that this will cause shall not only occur during the construction phases of the emergency release outlet but will significantly alter the attendance and revenue streams to the fair, fairgrounds lease holders and the economic impact to the surrounding Perris Valley area.

Subsequently, we respectfully request that Department of Water Resources review all of the enclosed information accordingly and plan for same with the 46^{1h} District Agricultural Association, lease holders and the public that utilizes the fairgrounds for their education, entertainment and own and operate business. END COMMENT V

ADDITIONAL NEW COMMENTS "DRAFT EIR" OCTOBER 24TH, 2016

DUAL USE-

COMMENT W: The "Draft" EIR indicates dual use by and between DWR and the 46th District Agricultural Association is feasible. However feasible multiple concerns include the maintenance of channel, environmental exposure from vehicles, parking, public use and liability, right of way and other possible items for discussion. END COMMENT W

BUSINESS INTERRUPTION-

COMMENT X: The fair must continue to stress the importance of the significant business interruption that the construction, bridge building, traffic plan, utilities and project will have (currently one renter -motocross) has made the decision to close due to the pending and unknown consequences that emergency release outlet plans and pending construction has created. Additionally, other renters have began reviewing business plans and adjust accordingly.

Revenue to the fairgrounds is decreasing without implementation as of this writing and we anticipate "significant impact" to further reduce business and revenue to the fair. END COMMENT X

UTILITIES-

COMMENT Y: The "draft EIR" indicates that there may be unknown closures due to utilities that are not identified may cause interruption in services. We request that additional study be performed as to identify possible utilities prior to the movement of on facilities. END COMMENT Y

TRAFFIC-

COMMENT Z: Traffic to SRA and the fairgrounds is significant part of Ramona Expressway and ingress/egress will have significant impacts to the attendees to the previously identified events located therein, subsequently the fairgrounds continues to stress the importance of timing of construction, scheduling of all work, planning and further study of traffic and parking plans for SRA and the fairgrounds. END COMMENT Z

EMERGENCY RELEASE OF WATER-

COMMENT AA: In the event of emergency release of water the fairgrounds has significant concern regarding vehicles parked or on the dual occupancy area and how release of water may impact vehicles in the area. END COMMENT AA

DUAL ENVIRONMENTAL & MATERIALS

COMMENT BB: Not identified within the "draft EIR" is information or mention of the dual sharing of land and the potential concerns or environmental impact that vehicles parked on

earthen areas (gas, oil, brake fluid, other fluids) that may be on property. Is this potentially problematic or minimal and of no concern. END COMMENT BB

DUAL PROPERTY SHARING LIABILITY-

COMMENT CC: DWR and fairgrounds require discussion of liability for shared land utilization prior to completion of property. END COMMENT CC

SUMMARY OF ADDITIONAL ITEMS

COMMENT DD: We discussed multiple new items or expounded on others including dual use, business interruption, utilities, traffic, emergency release of water, dual sharing and environmental areas and dual sharing and liability.

Previously identified the fairground has annual attendance over 700,000 people visiting or attending multiple events located on the fairgrounds proper. Economic impacts that this will cause shall not only occur during the construction phases of the emergency release outlet but will significantly alter the attendance and revenue streams to the fair, fairgrounds lease holders and the economic impact to the surrounding Perris Valley area motels, gas stations, restaurants and other business from related events

We respectfully request that Department of Water Resources review all of the enclosed information accordingly. END COMMENT DD

Respectfully;

CARL WUERSCH SIGNATURE

Carl Wuersch
CEO-Manager

Telephone (951) 657-4221 • Fax (951) 657-5412
www.SoCalFair.com or e-mail us at: media@.socalfair.com

Comment Letter 10

PECHANGA CULTURAL RESOURCES
Temecula Band of Luiseño Mission Indians

Post Office. Box 2183 • Temecula, CA 92593
Telephone (951) 308-9295 • Fax (951) 506-9491

October 27, 2016

VIA E-MAIL and USPS

Mr. Tom Barnes, ESA
on behalf of the California Department of Water Resources
626 Wilshire Boulevard, Suite 1100
Los Angeles, CA 90017

Re: Pechanga Tribe Comments on the Draft Environmental Impact Report forthe DWR Lake Perris DamrEmergency Release Facility Project

Dear Mr. Barnes

COMMENTA: This comment letter is written on behalf of the Pechanga Band of Luisefio Indians (hereinafter, "the Tribe"), a federally recognized Indian tribe and sovereign government. The Tribe formally requests, pursuant to Public Resources Code §21092.2, to be notified and involved in the entire CEQA environmental review process for the duration of the above referenced project (the "Project"). Please add the Tribe to your distribution list(s) for public notices and circulation of all documents, including environmental review documents, archeological reports, and all documents pertaining to this Project. The Tribe further requests to be directly notified of all public hearings and scheduled approvals concerning this Project. Please also incorporate these comments into the record of approval for this Project.

The Tribe understands that the proposed project would modify the current emergency release structure by removing the existing bulkhead and replacing it with one or more automated valves. We also understand that the project is composed of three distinct sections. The SRA segment would have two levees, the Main Levee and the North Training Levee. The Main Levee would be approximately 6,000 feet long, up to 10 feet high, and up to 87 feet wide at the bottom with 3:1 slopes. The North Training Levee would be approximately 685 feet long, up to 8 feet high and up to 60 feet wide at the bottom with 3:1 slopes. All levees will be constructed within native soils and if improvements are required, a temporary trench would be excavated and then backfilled to improve the foundation. The Fairgrounds segment will have a 320 foot-wide unlined trapezoid channel, which will have a depth of 25 feet on the east end and up to 11 feet depth on the west end. The Western segment would be developed as an unlined, earthen,

trapezoid channel, which would be approximately 2,500 feet long, with a 120-foot top width and 80-foot bottom, and nine feet deep with 2: 1 sidenslopes.

The Tribe submits these comments concerning the Project's potential impacts to cultural resources in conjunction with the environmental review of the Project. The Tribe previously submitted comments and consulted directly with the California Department of Water Resources (DWR) on the sensitivity of the Project and its possible impacts to cultural resources. Additionally, our Tribal Monitor Loren Garcia participated in the cultural resources survey of the project area, along with ESA in 2014 END COMMENT A

COMMENT B: After review of the Draft Environmental Impact Report, Pechanga has three main concerns. First, the Ethnographic Section clearly identifies that the Project area is within Luisefio territory. However, there is also a section on the Cahuilla, and a territory description that does not include the Lake Perris area. While we understand that Morongo submitted comments on the Project, the DEIR does not indicate whether they submitted specific comments and concerns regarding impacts to potential Tribal Cultural Resources. If they did, this information needs to be included in the DEIR. Otherwise, we suggest removing the Cahuilla section from the document. END COMMENT B.
COMMENT C: Secondly, the DEIR does not include information on the new amendment to CEQA, AB 52. Although this Project does not meet the requirements to consult under AB 52, nevertheless, it is a part of the CEQA process and an information paragraph should be included in the Regulatory Framework section. Additional information is presented below. END COMMENT C

COMMENT D: Finally, Pechanga is disappointed in the lack of Tribal involvement in almost all aspects of the proposed mitigation measures. Pechanga Cultural Resources Department, including the monitoring program, has been formally organized since 1999, with tribal monitoring occurring for several decades before then by our elders. Our tribal monitors are professionally trained and provide a necessary service that is distinct from those of an archaeological monitor. Tribal Monitors are trained to identify resources from a cultural point of view - a skill set that a non- Native archaeologist is simply incapable of utilizing. In fact, we have many examples where our tribal monitors have identified resources missed or misidentified by an archaeological monitor. Using these special skills, our monitors strive to protect the People, including their places and things that once flourished in this area. As drafted, the mitigation only "invites" a tribal monitor to be present during ground-disturbing activities. It is imperative that a tribal monitor not only be present to ensure sensitive and irreplaceable cultural resources are appropriately identified and protected, but to be professionally contracted, acknowledging that they are providing a specialized, professional service. Given the sensitivity of the Project area which is clearly stated by the Project archaeologist and in the DEIR, it is the position of the Pechanga Tribe that Pechanga tribal monitors should be required for all ground-disturbing activities conducted in connection with the Project, including any additional archaeological excavations performed, as well as part of the sensitivity training that will be done for the construction personnel. END COMMENT D

THE CALIFORNIA DEPARTMENT OF WATER RESOURCES MUST INCLUDE INVOLVEMENT OF AND CONSULTATION WITH THE PECHANGA TRIBE IN ITS ENVIRONMENTAL. REVIEW PROCE

COMMENT E: It has been the intent of the Federal Government1 and the State of California2 that Indian tribes be consulted with regard to issues which impact cultural and spiritual resources, as well as other governmental concerns. The responsibility to consult with Indian tribes stems from the unique government-to-government relationship between the United States and Indian tribes. This arises when tribal interests are affected by the actions of governmental agencies and departments. In this case, it is undisputed that the project lies within the Pechanga Tribe's traditional territory. Therefore, in order to comply with CEQA and other applicable Federal and California law, it is imperative that the California Department of Water Resources consult with the Tribe in order to guarantee an adequate knowledge base for an appropriate evaluation of the Project effects, as well as generating adequate mitigation measures. END COMMENT E

COMMENT F: Additionally, as mentioned in our letter above, the DEIR does not mention AB52 in Section 3.4.2 Regulatory Setting subsection State. As you know, effective July 1, 2015, CEQA was amended to include an entirely new category of resources, " Tribal Cultural Resources" (TCR). The report only cites to the CEQA Guidelines provisions regarding the significance of impacts to archaeological and historical resources, while failing to mention "TCR" new category of resources. In order to accurately reflect the regulatory framework, the DEIR should be updated to include reference to these changes in the law. END COMMENT F

REQUESTED TRIBAL INVOLVEMENT AND MITIGATION

COMMENT G: The proposed Project is on land that is within the traditional territory of the Pechanga Band of Luisei'io Indians. Pechanga is not opposed to this Project; however, we are opposed to any direct, indirect and cumulative impacts this Project may have to tribal cultural resources. The Tribe's primary concerns stem from the Project's proposed impacts on Native American cultural resources. The Tribe is concerned about both the protection of unique and irreplaceable cultural resources, such as Luisei'io village sites, sacred sites and archaeological items which would be displaced by ground disturbing work on the Project, and on the proper and lawful treatment of cultural items, Native American human remains and sacred items likely to be discovered in the course of the work. END COMMENT G

1 See e.g., Executive Memorandum of April 29, 1994 on Government-to-Government Relations with Native American Tribal Governments, Executive Order of November 6, 2000 on Consultation and Coordination with Indian Tribal Governments, Executive Memorandum of September 23, 2004 on Government-to-Government Relationships with Tribal Governments, and Executive Memorandum of November 5, 2009 on Tribal Consultation.

2 See California Public Resource Code §5097.9 et seq.; California Government Code §§65351, 65352 .3 and 65352.4

COMMENT H: After review of the DEIR and based on the known sensitivity of the Project area, Pechanga highly recommends revisions to the proposed mitigation measures including to require a Sensitivity Training module for the construction personnel presented by the Project archaeologist and a Pechanga representative, as well as compensation for professional tribal monitoring services for all proposed earthmoving activities. As stated above, the Pechanga Tribal monitors provide a professional service, one that we are mandated to do by the Pechanga People and which is taken very seriously, as the monitoring process is often the last anyone will observe of the Ancestors, their Places and their Things. While the Tribe appreciates the opportunity to monitor projects within its ancestral territory, in order to be respectful of the professional services provided by Pechanga, a sovereign tribal government, compensation should be integral to the contracting process. We request that these measures be incorporated into the final EIR and any other final environmental documents approved by the Department of Water Resources (underlines are additions, strikethroughs area deletions). END COMMENT H

COMMENT I: CUL-1: Construction personnel shall be trained in the identification of cultural resources. Prior to earthmoving activities, cultural resources sensitivity training shall be presented to all construction personnel. The training will be conducted by the qualified archeologist, or an archaeologist working under the direction of the qualified archeologist. along with a representative designated by the Pechanga Tribe. Construction personnel shall be informed of the types of archaeological resources that may be encountered, and of the proper procedures to be enacted in the event of an inadvertent [discovery of] archaeological resources or human remains. DWR shall ensure that fill construction personnel are made available for and attend the training and retain documentation demonstrating attendance. END COMMENT I

COMMENT J: CUL-2: An archaeological monitor (working under the direct supervision of a qualified archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology [U.S. Department of the Interior, 2008]) shall be present during initial all ground disturbing activities to assess subsurface conditions. Native American monitor shall be invited to be present. B ased on observations made by the archaeological and Pechanga Tribal monitors, monitoring activities may be modified at the recommendation of the qualified archaeologist in coordination with the Pechanga Tribal Monitor and coordination with DWR.

Any newly discovered cultural resources shall be subject to a cultural resources evaluation pursuant to state law bv the Project archaeologist. the DWR and the Pechanga Tribe, prior to the start of grading. The cultural resources evaluation shall be detailed in a Cultural Resources Mitigation Monitoring Plan ("CRMP"). The CRMP, among other topics, shall document the proposed methodology for inadvertent finds, the state law process applicable to discovered human remains, the grading activity observation process. the mitigation measures and conditions of approval for the Project. in accordance with the Pechanga Tribe's Treatment Agreement required in CUL-3. END COMMENT J

COMMENT K: CUL-3: At least thirty (30) days prior to the first of either: seeking a grading permit or startine: any operations that will have an effect of ground disturbance. the Project Applicant shall contact the Pechanga Tribe to notify the Trib eof its intent to pull permits for the proposed grading and excavation, or to start anv ground disturbing activities and to coordinate with the Tribe to develop a Cultural Resources Treatment and Monitoring Agreement ("Agreement'). The Agreement shall address the treatment of known cultural resources: the treatment and final disposition of any tribal cultural resources,. sa sacred sites, human remains or archaeological resources inadvertently discovered on the Project site; Project grading, ground disturbance and development scheduling; the designation, responsibilities, and participation of professional Pechanga Tribal Monitor(s) during grading, excavation and ground disturbing activities: and compensation for the Pechanga Tribal Monitors. including overtime, weekend rates, and mileage reimbursements.

The Pechanga Tribal Monitor(s) shall have similar authority to the archaeological monitors. including the authority to stop and redirect grading in the immediate area of a find in order to evaluate the find and determine the appropriate next steps in consultation with the Project archaeologist. Such evaluation shall include culturally appropriate temporary and pem1anent treatment pursuant to the Agreement, which may include avoidance of cultural and archaeological resources, in-place preservation, or re-burial on the Project property in an area not subject to future disturbances for preservation in perpetuity. The reburial of any cultural resources shall occur in a location agreed to by the landowner and the Pechanga Tribe, the details of which shall be addressed in the Agreement. Treatment may also include curation of the cultural resources at the Pechanga Tribe's curation facility. END COMMENT K

COMMENT L: CUL- : In the event of the unanticipated discovery of archaeological materials, DWR shall immediately cease all work activities in the area (within approximately 100 feet) of the discovery until it can be evaluated by a qualified archaeologist, a Pechanga representative and Project Applicant and meet and confer regarding the appropriate treatment (i.e., preservation, avoidance. and/or mitigation for the resources). Cultural and archaeological resources are inadvertent discoveries when they were not anticipated to be found during the Project's activities. This may include previously unknown sacred sites and items, midden deposits. artifacts, hearths, bedrock outcrops. human remains and other resources, etc. Prehistoric archaeological materials might include obsidian and chert flaked stone tools (e.g., projectile points, knives, scrapers) or toolmaking debris; culturally darkened soil (midden) containing heat affected rocks, artifacts, or shellfish remains; and stone milling equipment (e.g., mortars, pestles, handstones, or milling slabs); and battered stone tools, such as hammerstones and pitted stones. Historic-period materials might include-stone or concrete footings and walls; filled wells or privies; and

deposits of metal, glass, and/or ceramic refuse. Construction shall not resume until the qualified archaeologist has conferred with DWR on the significance of the resource.

Consistent with California Public Resources Code Section 21083.2(b) and Assembly Bill 52 (Chapter 532. Statutes of 2014). avoidance shall be the prefen.-ed method of preservation for tribal cultural resources and archaeological resources. Preservation in place maintains the important relationship between artifacts and their archaeological and cultural context and also serves to avoid conflict with traditional and religious values of groups who may ascribe meaning to the resource. Preservation in place may be accomplished by, but is not limited to, avoidance, incorporating the resource into open space, or deeding the site into a permanent conservation easement. In the event that preservation in place is demonstrated to be infeasible and data recovery through excavation is the only feasible mitigation available as agreed upon by the Project archaeologist, the Pechanga Tribe and the Project Applicant/landowner, measures outlined in the CRMP shall be implemented by a the Project archaeologist in consultation with DWR and the Pechanga Tribe, that provides for the adequate recovery of the archaeological resource and accounts for any tribal concerns as expressed in the consultation process described above. DWR shall consult with the Pechanga Tribe and appropriate Native American representatives in determining treatment for prehistoric or Native American resources as outlined in CUL-7. END OF COMMENT L

COMMENT M: CUL-5 If human remains are encountered, consistent with California Health and Safety Code Section 7050.5, no further disturbance shall occur until the [Appropriate] County Coroner has made the necessary findings as to origin of the remains. Further, consistent with California Public Resources Code Section 5097.98(b). human remains shall be left in place and free from disturbance until a final decision as to the treatment and disposition has been made.

If the Riverside County Coroner determines the remains to be Native American, the Native American Heritage Commission shall be contacted within twenty-four (24) hours. The Native American Heritage Commission shall immediatelv identify the "most likely descendant(s)" and notify them of the discoveiy . The " most likely descendant(s)' shall make recommendations within fo1ty-eigbt (48) hours. and engage in consultati ons with the landowner concerning the treatment of the remains. as provided in Public Resources Code Section 5097.98 and the Agreement described in CUL-3. END OF COMMENT M

COMMENT N: CUL -6 The Project archaeologist shall prepare a final archaeological report within sixty (60) days of completion of the Project. The report shall follow ARMR Guidelines and Department of Water Resources requirements and shall include at a minimum: a

discussion of the monitoring methods and techniques used; the results of the monitoring program, including any aiiifacts recovered; an invent01y of any resources recovered: updated DPR forms for site(s) identified: fin.al disposition of the resources: and. any additionaJ recommendations. A final copy shall be submitted to the Departmept of Water Resources, the Eastern Information Center (EiC), and Pechanga Tribe. END OF COMMENT N

COMMENT O: CUL-7 All cultural materials collected dming the grading monitoring program and from any previous archeological studies or excavations on the Project site, excluding sacred items, burial goods and hwnan remains which will be addressed in the Agreement required in MM 1, shall be curated in the Pechanga Tribe's curation facility according to current professional repository standards. The collections and associated records shall be transferred, including title, to the Pechanga Tribe's curation facility which meets the standards set forth in 36 C.F.R. Part 79 for Federal repositories. All sacred sites, should they be encountered within the Project area shall be avoided and preserved in perpetuity as the preferred mitigation, if feasible. END OF COMMENT O

COMMENT P: The Tribe reserves the right to fully participate in the environmental review process, as well as to provide further comment on the Project's impacts to cultural resources and potential mitigation for such impacts after we receive our requested documentation.

The Pechanga Tribe looks forward to working together with the Department of Water Resources in protecting the invaluable Pechanga cultural resources found in the Project area. Please contact me at 951-770-8113 or at eozdil@pechanga-nsn.gov once you have had a chance to review these comments so that we might address any outstanding issues concerning the mitigation language. Thank you. END COMMENT P

Sincerely
SIGNATURE
Tuba Ebru Ozdil Planning Specialist

Cc Pechanga Office of the General Counsel

Comment Letter 11

OVAL ENTERTAINMENT, LLC

Perris Auto Speedway

October 20, 2016

California Department of Water Resources
C/O Tom Barnes, ESA
626 Wilshire Boulevard, Ste. 1100
Los Angeles, California 90017

RE: Draft Environmental Impact Report, Perris Dam Emergency Release Facility.

Dear Mr. Barnes:

COMMENT A: OVAL Entertainment LLC (OVAL) dba Perris Auto Speedway (PAS) has reviewed the California Department of Water Resources (DWR) Draft Environmental Impact Report (EIR) for the Perris Dam Emergency Release Facility (Proposed Project) and has concluded that the proposed project will negatively impact the operation of our racetrack. Construction of the project as outlined, will impact employees, users, and public spectators trying to enter or exit the facility. When you add the attendance for both private and public events, PAS has over 120,000 visitors per year. Any good racetrack promoter ranks the ingress and egress into their facility as the number one priority of a successful venue. Our facility is a destination facility and any negative impact to the access of the facility will have a corresponding negative impact to our race fans. Without race fans there is no Racing! Specifically, any full or partial road closures of Lake Perris Drive or Fair Way Drive/Avalon Parkway within the three-year construction timeframe will impact the PAS for years to come. A perfect example is when Kentucky Speedway hosted their first NASCAR Sprint Cup race on July 9, 2011 and had traffic backed up for miles. After investing over $10 million dollars of improvements to their facility their attendance in 2012 was the worst of any Speedway Motorsports Incorporated owned tracks. Race fans like most sport fans do not tolerate poor traffic conditions. It will take years for SMI to rebuild their image at the Kentucky Speedway . The PAS cannot afford to go through this. This project could force the closure of one of America's premier racing facilities.

18700 Lake Perris Drive, Perris, CA 92571 Phone: (909) 940-0134 Fax: (909) 940-0634

The PAS has been a tenant of the 46th District Agricultural Association/Lake Perris Fairgrounds since 1995. OVAL's current contract (95-37-INT) expires in December of 2029 and expects to extend the existing contract for an additional 15 years. The PAS racing season runs annually from January to mid December. Historically, the PAS has produced up to 50 events per year. The majority of these events are on Saturday nights, however the PAS also produces multi-day events throughout the year. These multi-day events typically are at the beginning and end of the season. In addition, the PAS provides race teams; tire manufactures (BF Goodrich, Hoosier and Goodyear), racecar developers (American Honda, Yamaha, Chevrolet and Toyota), racecar driving schools, and race clubs the opportunity to rent the racetrack for their private practice (Tune and Testing) sessions. These private practice sessions occur throughout the entire year. In 2016, the PAS had a record with over 100 private practices. The current trend indicates a significant increase over the previous year. In addition, the PAS has been a remote shoot location for television commercials and television programs. The facility is virtually available any day or night of the year. Therefore, the PAS requires access from Ramona Expressway and Fair Way Drive/ Avalon Parkway for 365 days a year.

According to the DWR's Draft EIR, the proposed project is estimated to take up to three years and impact both entrances to the Lake Perris Fairgrounds via Ramona Expressway, Lake Perris Drive, and Fair Way Drive/Avalon Parkway . Avalon Parkway turns into Fair Way Drive on the north side of Ramona Expressway that accesses the Lake Perris Fairgrounds. The impacts on ingress and egress at these roadways and both entrances into the track are devastating. END COMMENT A

LAKE PERRIS DRIVE

COMMENT B: Lake Perris Drive is the main ingress and egress for our Spectators, Vendors, Employees, Sponsors, Staff, VIP's, and Campers for our events. This Parking Lot opens up three hours prior to the Front Gate opening. The Campground opens up a minimum of one day prior to the event. The typical hours of operation for the Parking Lot is from 2:00 pm till 11:30 pm. The Campground closes at noon the day after the event. Lake Perris Drive is the ingress and egress for our concession and facility supply deliveries as well. These deliveries are from several organizations and occur during the weekdays from 8:00 am to 5:00 pm.

The PAS suffered tremendously from the "Great Recession" which started in 2008. Attendance from 2009 through 2010 declined almost 50%. OVAL suffered significant operating losses during these years. Since 2011, the attendance has continued to rebound to the levels prior to 2009. Our goal is to continue to increase the total number of annual events back up to 50 and beyond as the economy continues to improve. Currently, 2016 has been one of the best financial years

FOR OVAL. With the construction of this project estimated to start in 2018, momentum of our recovery will be derailed.END COMMENT B

COMMENT C: FAIR WAY DRIVE/AVALON PARKWAY

Fair Way Drive (as identified as Avalon Parkway in the Draft EIR) is the Gate "A" entrance to the Lake Perris Fairgrounds. The PAS was designed in 1996 to utilize this gate for the infield pit entrance and pit parking lot. This entrance is where up to 150 racecar haulers plus up to an additional 600 cars per event enter the facility. The primary pit area is inside the racetrack with overflow pit parking in the pit parking lot. The back pit area has been designed to not only function as one main pit area, but also a pit area and a parking lot. All pit areas are restricted areas and must be managed accordingly.

The Pit area opens for parking at 12:00 pm on event days and closes at 1:00 am on event days. However, some teams travel a long distance and are therefore allowed to spend the night and leave the facility by 12:00 pm the day after the event. As the only access road to the infield pit area, any full or temporary closure of Fair Way Drive will close the facility to all events and private practices. This access road was designed specifically to be used by Race Haulers that can be as long as 75 feet. To simply say, the main entrance will be used as an alternate route only gets them on the property not in the infield. This entrance is also our designated emergency responders way of accessing the facility if their services are needed during an event. END COMMENT Ce

COMMENT D: The full closure of the Fair Way Drive/Avalon Parkway will have a significant impact on the operation of the PAS. OVAL recommends, that the DWR construct the bridge similar to Option A Partial Closure at Lake Perris Drive with a minimum of one lane in and one lane out during D construction. This would close some the ingress/egress lanes into the Fairgrounds at this intersection during phased construction of the bridge, while still allowing reduced two-way traffic access. END COMMENT D

COMMENT E: With respect to our livelihood, PAS provides the following comments to the (DWR) Draft EIR for the Proposed Project

A. The Notice of Preparation (September 9, 2013) stated: "The EIR will assess impacts to local utilities and service systems". The Draft EIR failed to identify the local utilities that service the local business's including the Lake Perris Fairgrounds and the PAS. Furthermore, the Notice of Preparation stated: "The proposed project may also have temporary impacts to local utility distribution systems." The Draft EIR does not discuss the duration of the impacts

that will occur during the construction phase. The Draft EIR states "The project could have significant impact if it would encounter buried utilities". The Mitigation Measure states: "During design and prior to construction, an underground utilities search will be conducted to compile available information on utility locations." Based on our knowledge of the area, the following utilities will be impacted within the project that services the Lake Perris Fairgrounds and the PAS:

1) The water system for the Fairgrounds is fed by an underground 12-inch main line that enters the facility just west of Fair Way Drive/Avalon Parkway. The shut off valves and the backflow preventer is within the excavation area of the Proposed Project.

2) The high voltage electrical service for the Lake Perris Fairgrounds is fed above ground just west of Fair Way Drive/Avalon Parkway. There are four power poles within the excavation area of the Proposed Project.

3) The PAS electrical is fed below ground and ties into Edison's underground vault near the Sports Pavilion on the Fairgrounds. The feed for this underground vault is unknown.

4) The Telephone and Internet lines are distributed from a hub south of the Ramona Expressway and the Lake Perris Drive intersection. The lines extending to the Lake Perris Fairgrounds and the PAS are underground and cross through the excavation area of the Proposed Project.

5) The main gas lines that enter the Fairgrounds and the PAS are underground and their location is unknown.

6) The Fairgrounds sewer system is fed to an underground pumping station that is located just east of Lake Perris Drive. This pumping station is located within the excavation of the Proposed Project and will have to be located to a new location.

All these utilities are located within the Emergency Release Facility footprint. The conclusion in the EIR is a less than significant with mitigation measures. However, at this time the Draft EIR does not list or locate the impacted utilities. In Section 3.12.3 Impacts and Mitigation Measures the Draft EIR states: "The proposed project would have a significant impact if it would encounter buried utilities". It is clear they will encounter buried utilities during the excavation of the Emergency Release Facility. Therefore, OVAL would like the Department of Water Resources to guarantee that there will not be any service interruptions during setup and operational periods of the racetrack. END COMMENT E

B. COMMENT F: Both entrances to the Fairgrounds will be impacted during the construction of the Emergency Release Facility as they construct bridges at both entrances. The Main entrance (Ramona Expressway and Lake Perris Drive) will be impacted for one (Option B) to two years (Option A) depending upon which option is chosen. The Draft EIR states "Option A will have significant and unavoidable impacts when special events are held at the Lake Perris Fairgrounds" which includes OVAL events. Option B will have less than significant impacts, however the perception of a temporary entrance road along with the ongoing construction

will impact the attendance at the PAS. The Fair Way Drive / Avalon Parkway entrance for the Fairgrounds will be closed for approximately 12 months. This entrance is the only entrance used by Race Teams and Transporters to access the back parking lot and the infield pit area to the PAS. The traffic will have to be rerouted to the Main Entrance and a new access road will have to be established to access the back parking lot, pit booths and the infield pit area. This rerouting will significantly impact the Main Entrance with the closure of the Fair Way Drive/Avalon Parkway entrance. In addition, the closure of the Fair Way Drive / Avalon Parkway entrance will impact the exiting of the facility after OVAL events as we currently open all exit routes when the event is over. Currently some events take over an hour to have all the spectator cars exit the facility. With only one exit the estimated timeframe will be as high as two hours to exit all the vehicles from the facility, which will further affect the spectator experience. END COMMENT F

COMMENT G: C. Upon reviewing the KOA Corporations Traffic Impact Analysis OVAL has the following comments:

OPTION A - PARTIAL CLOSURE OF LAKE PERRIS DRIVE

In Section 2.2 Project Schedule the following is stated, "Construction of the ERF is scheduled to begin in early 2018 or later. The construction of the two bridge structures could begin as early as 2018 and would be completed by no later than 2023." This timeline is inconsistent with the construction schedule in the Draft EIR. END COMMENT G

COMMENT H: 2) In Section 3.4 Significant Traffic Impacts lists The Lake Perris Drive & Ramona

Expressway is currently operating at a LOS F during the p.m. peak hour. Existing Intersection LOS-Section 1.5 states that "LOS F was used as the standard at Ramona Expressway intersection." The closure of Fair Way Drive/Avalon Parkway intersection for access to the Fairgrounds and the PAS will impact this highly congested intersection too much higher levels. END COMMENT H

COMMENT I: 3) In Section 4.1 Project Trip Generation the additional total number of daily truck trips of 870 alone with the approximately 236 daily worker trips will compound the LOS "F" rated intersection and further increase the impact. END COMMENT I

COMMENT J: 4) In Section 5.3 Lake Perris Drive Closure Construction Analysis although the results show at the intersection a PM. LOS F rating (>300), the p.m. period was conducted to simulate a period of high traffic congestion, using weekday counts as traffic counts for a major weekend event (like the PAS) or period of high recreational activity were not available." Furthermore, their conclusion states, "The lane modifications at the Lake Perris Drive / Ramona Expressway intersection would create a significant traffic impact. This impact would occur when events occur at the Perris Fairgrounds, or when major weekend activity occurs at the lake". There is no question this already highly congested intersection during construction will impede the ingress and egress to the PAS. The

projected >300 Average Stop Delay is five time higher than the >80 threshold of assigning a LOS factor of F END COMMENT J.

5) COMMENT K: In Appendix C Existing Plus-Project Construction Levels of Service Worksheets (Partial Closure) the Lake Perris Drive-P.M Peak Hour Intersection Summary indicates a delay of 1,222.4 with a LOS F rating. Please clarify or explain why 1,222.4 is not used as the PM Delay in Table 11 "Lake Perris Drive Work Area Impacts-Existing plus-Project Condition." END COMMENT K

6) COMMENT L: In Section 6.3 Future Intersection Levels of Service the PM LOS rating is an 11 F11 (152.5) without construction conditions. END COMMENT L

7) COMMENT M: In Section 7.4 Lake Perris Drive Closure Construction Analysis the PM LOS rating is an F (177.5) and once again the PM analysis was conducted to simulate a period of high traffic congestion, using weekday counts which is not accurate. Again the following statement is made, 11 The lane modifications at the Lake Perris Drive / Ramona Expressway intersection would create a significant traffic impact. This impact would occur when events occur at the Perris Fairgrounds, or when major weekend activity occurs at the Lake. END COMMENT M

8) COMMENT N: In Section 9. Conclusions and Recommended Measures in the near future without project conditions, nine of the sixteen study intersections would operate at LOS E or F during the AM or PM peak hours. With Project construction with Option A (partial closure) conditions, nine of the sixteen study intersections would operated at LOS F during the AM or PM peak hours and under Option B (full closure) conditions, eleven of the sixteen study intersections would operate at LOS F during the AM or PM peak hours. This severe impact to the access of the roadway will in turn result in significant negative impacts to our operation as a result of race teams and fans avoiding our facility. END COMMENT N

9) COMMENT O: Why wasn't there any traffic data and analysis presented on the Full Closure of the Fair Way Drive /Avalon Parkway intersection? It seems there is no consideration for the Fairgrounds and the PAS on the Closure of the Fair Way Drive / Avalon Parkway intersection even though there was a 72 hour directional volume count compiled on September 5 - 7, 2013. This intersection and entrance is a major part of the ingress and egress for the Lake Perris Fairgrounds and the PAS. END COMMENT O

OPTION B - FULL CLOSURE WITH A TEMPORARY DETOUR ROAD

1) COMMENT P: In Section 5.2 Option B (Full Closure at Evans Road) Construction Analysis will increase the already heavily traveled Ramona Expressway in both directions. END COMMENT P
2) COMMENT Q: Lake Perris Drive & Ramona Expressway under existing PM conditions is already rated at delay factor of 119.2 and has a LOS rating of F. END COMMENT Q
3) COMMENT R: Lake Perris Drive & Ramona Expressway in 2023 with no construction PM conditions is forecasted to have a delay factor of 152.5 and has a LOS rating of F. That is a change in delay value of 33.3. What does this mean in additional time delay? END COMMENT R
4) COMMENT S: There is no data supporting the closing of the Fair Way Drive/Avalon Parkway plus the added truck and employee traffic on the Lake Perris Drive and Ramona

Expressway intersection during the construction of the bridge at Fair Way Drive/Avalon Parkway. Clearly there will be an impact. END COMMENT S

5) COMMENT T: The Statement that "The temporary road would maintain the full current capacity of Lake Perris Drive, with NO •change in traffic conditions and would maintain full access to the Lake Perris SRA and Lake Perris Fairgrounds" is false. The design of the temporary road has a curve to it, which will impact traffic and the "Lockie Lou" factor going through the construction site will be significant! END COMMENT T

6) COMMENT U: After an event the Fair Way Drive/ Avalon Parkway intersection is used to alleviate the existing traffic after an event. With only one lane heading west and east on Ramona Expressway in the temporary detour entrance, the PAS and the Lake Perris Fairgrounds will be losing 50% of the exit capacity with the closure of the Fair Way Drive/Avalon Parkway exit. This reduction in capacity will have a significant impact on the PAS and Fairgrounds. END COMMENT U

7) COMMENT V: At the end of Volume 3 under Traffic Volumes on Local Area Roadways there is a 72 Hour Directional Volume Count on Ramona Expressway E and Avalon Parkway. It appears they did this count on the south side of the intersection that will not be impacted by the construction on the north side of the intersection. There appears to be no data on the North Side of Avalon Parkway, which is actually Fair Way Drive and the entrance and exit that will be closed during construction. END COMMENT V

8) COMMENT W: In the same Section there is a Traffic Volume on Gate "B" off of Lake Perris Drive, which is the Main Entrance to the PAS and the Fairgrounds. This was done from Thursday - Saturday on September 5th - 7th, 2013. These volumes are not even close to current conditions in 2016. In 2013 the peak volume on September 7, 2013 (The PAS was having a "Night of Destruction" event that night) was 624 at 6:00 pm. If you total the count from 4:00 pm to 7:30 pm the total volume was 1,153. On September 3, 2016 the PAS had the same show as 2013, however, the volume of cars that were parked for that event was 4,127 roughly 3.5 times higher than 2013. With Avalon Parkway opened as an exit, it still took almost two hours to exit all the traffic after the event was over. Without Avalon Parkway it will take over 2 hours, which is unacceptable to our race fans. END COMMENT W

D. COMMENT X: The weekend traffic volume at the Lake Perris Drive and Ramona Expressway in the Draft EIR shows a Peak -Hour volume of 714. OVAL's volume of parked vehicles can be as high 4,127 not including other events that are occurring on the Fairgrounds at the same time. These vehicles enter the facility in less than a two-hour period. END COMMENT X

E. COMMENT Y: The designated haul routes for the excavation of the Emergency Released Facility west of Lake Perris Drive shows the traffic utilizing Lake Perris Drive, which will impact the ingress and egress of the facility. END COMMENT Y

F. COMMENT Z: There are five proposed Alternatives all of which would result (except for Alternative 5 - No Project) in "Significant and unavoidable traffic and circulation impacts with mitigation incorporated." So no matter what the project turns out to be, the Lake Perris Fairgrounds and the PAS will be significantly impacted. END COMMENT Z

G. COMMENT AA: When the Proposed Project impacts the attendance at OVAL's events the lower attendance will ultimately impact Sponsorship Revenue. The number and size of sponsorships are dependent upon the volume of product sold or the total attendance (impressions) for OVAL's events. Sponsorship Revenue is a vital component for the success of the Speedway. END COMMENT AA

H. COMMENT BB: In Section 6.1.3 Review of Significant Environmental Impacts it states the following; "Implementation of the proposed project would result in the following significant and unavoidable impacts during the construction period to aesthetics, noise and transportation and traffic: (1) construction impacts would degrade the existing visual character of the project site and its surroundings; (2) noise impacts would increase ambient noise levels: and (3) daily traffic flows on local roadways would be temporarily disrupted during bridge and box culvert construction". Further information regarding the impacts to the Lake Perris Fairgrounds and the PAS is needed. END COMMENT BB

I. COMMENT CC: In Chapter 4 Cumulative Impacts, Transportation and Traffic states the following; "As described in Chapter 3, the proposed project would result in short-term increases in vehicle trips, reduced access to roadways, increased potential for traffic safety conflicts, and increased wear and tear on designated haul routes. Although some of the project impacts would be re,duced to less than significant with proposed mitigation measures, the OVERALL construction activities and road closures WOULD CAUSE SIGNIFICANT AND UNAVOIDABLE IMPACTS DURING CONSTRUCTION. Thus, the project could further contribute to cumulative traffic and circulation impacts when considered in combination with projects listed in Table 4-1." This statement alone raises red flags on the ingress and egress into the PAS. END COMMENT CC

J. COMMENT DD: Historically we release our upcoming yearly event schedule no later than October 31st so that the race teams; race fans and sponsors can plan accordingly. Based on construction scheduled to start in 2018 and the unknown of how this is going to impact the PAS, it will be extremely difficult to develop a schedule of events. This project will disrupt the planning and operation of the Speedway going forward for all the reasons stated above. This project will impact the amount of events we can produce which will in turn will impact, Ticket Sales, Pit Gate Sales, Membership Sales, Entry Fee Sales, Concession Sales, Souvenir Sales, Sponsorship Sales and Track Rental Sales. All of these factors affect the long-term viability and future of the PAS. END COMMENT DD

ALTERNATIVES

1. COMMENT EE: Out of the four alternatives for the construction of the channel in the Fairgrounds Segment, OVAL recommends Alternative 4 - Fully Covered Channel option to be constructed instead of the proposed 320 wide-open channel. The impacted area for construction will be much less than the proposed project. The total amount of excavated material will be significantly less. The project timeline should be shorter than proposed. If designed properly, there should be no need to construct the bridges at both entrances to the Fairgrounds. Once this alternative is complete the Fairgrounds would return to pre-project conditions and existing parking availability at the Lake Perris Fairgrounds and the PAS would not be permanently impacted. END COMMENT EE

2. COMMENT FF: OVAL's second choice for the Fairgrounds Segment as presented in the Alternatives Section of the Draft EIR is Alternative 2 - Concrete-Lined Channel. The impacted area for construction will be much less than the proposed project. The total amount of excavated material will be significantly less. The span of the bridges at the entrances to the Fairgrounds would be 75% shorter than the proposed project. The land adjacent to Ramona Expressway could be fenced and landscaped to minimize the appearance of the channel. This alternative would minimize the loss of area to be used as parking for the Fairgrounds and PAS events. END COMMENT FF

3. COMMENT GG: The proposed Fairgrounds Segment that claims to allow for dual function is a recipe for disaster! Who would be liable, if and when this area was used for parking and foot traffic during an event and a significant earthquake occurred and there was a mandatory release into the channel? In addition, parking on a 10:1 slope is not advisable for the public. Event Parking planners and operators know through experience the difficulties associated with general public parking on flat terrain. Parking on sloped terrain will compound this complexity further increasing the time for ingress and egress as well as significantly increasing the risk of personal and property injury of both drivers and pedestrians. END COMMENT GG

4. COMMENT HH: All of these alternatives, except for Alternative 2: Fairgrounds Segment - Concrete Lined Channel, are proposing excavated depths as deep as 25 feet. The Fairgrounds has a well (not in service) on the property and the groundwater is currently at 12 feet. Has the depth of the groundwater been determined and the impact of the proposed project intersecting the water table been assessed including dewatering issues and impacts to groundwater quality? Does DWR anticipate this to be an issue during construction? END COMMENT HH

OVAL appreciates the EIR process and hopes that these comments show the extreme financial impact to the PAS. If you have any questions please do not hesitate to contact us. We look forward to your timely reply to our questions.

Sincerely.

Don A Kazan
President
OVAL Entertainment LLC

Comment Letter 12

Family A Fair, Inc.

1983 34 Years of Excellence 2016

October 21, 2016

California Department of/water Resources
C/o Tom Barnes, ESA
626 Wilshire Boulevard, Ste. 1100
Los Angeles, Ca 90017

Dear Mr. Barnes,

COMMENT A: Family A Fair Inc. is the current Master Concessionaire for the Southern California Fair facility located at 18700 Lake Perris Dr., Perris Ca. We have been committed and honored to conduct business on this property since 1995. We are the food and beverage operators for all events that take place on this property, holding service contracts with promoters such as Don Kazarian, who operates the Perris Auto Speedway. The events on this property produce over 50 percent of our annual gross revenue. We employ 8 full-time employees and 50 part-time. We project that over half of four employees may lose their jobs if this construction moves forward.

After reviewing the California Department of Water Resources Draft Environmental Impact Report for the Perris Dam Emergency Release Facility, we have concluded that the proposed project will incur an extreme financial burden on our company. With all the road closures specified it will no doubt affect the attendance of all events on this property influencing the investing promoters in a negative manner, as it trickles down to our department, who services their customers.

With all due respect, Family A Fair Inc. ask that alternative operations would be considered such as the suggestion from Oval Entertainment by (Don Kazarian), of a Fully Covered Channel.

Thank you for informing ***our*** community of this proposed project. We understand the importance of this operation and hope that all considerations are encountered. END COMMENT A

Sincerely,

Dale Smith CEO/Pres
Family A Fair Inc.
951-830-3280

RUTAN

RUTAN & TUCKER, LLP

John Ramirez

Direct Dial: (714) 662-4610
E-mail: jramirez@rutan.com

October 21,2016

VIA FEDERAL EXPRESS

Tom Barnes
Environmental Science Associates
c/o California Water Resources
626 Wilshire Boulevard,Suite 100
Los Angeles, CA 90017

Re: DWR Pen-is Dam Emergency Release Facility Draft EIR

Dear Mr. Barnes:

COMMENT A: Thank you for the opportunity to comment on the draft Environmental Impact Report ("DEIR") regarding the Perris Dam Emergency Release Facility ("Project") prepared for the Department of Water Resources ("DWR"). We submit these comments on behalf of Mission Pacific Land Company, which owns land directly adjacent to the Western Segment ofthe Project.

Attached hereto is a Technical Memorandum evaluating the proposed Project by Albert A. Webb Associates, a civil engineering and planning services firm that bas served both public and private sector clients throughout Inland Southern California since 1945, with offices in Riverside, Palm Desert, and Murrieta. Webb Associates' expertise includes project development, planning and design, construction management, and ongoing maintenance and operation for drainage infrastructure, floodplain management, and stormwater management projects. A Statement of Qualifications for Webb Associates is also attached.

Before it approves a project that may have significant impacts on the environment,a public agency must consider an environmental impact report. An EIR is an informational document that must (i) provide public agencies and the public with **detailed information** about a project and the effects the project is likely to have on the environment; (ii) list ways in which the significant effects of the project might be mitigated; and (iH) identify alternatives to the project. (Pub. Res. Code §§ 21002, 21002.l(a), 21061,21100,21150; 14 Cal. Code Regs.§ 15362; *Vineyard Area Citizens for Responsible Growth v. City ofRancho Cordova* (2007) 40 Cal.4th 412.)

Enough detail must be provided so as to enable the public and the agencies that will consider the project to have the information necessary to weigh competing policies and interests. *(See Citizens a/Goleta Valley v. Board ofSupervisors* (1990) 52 Cal.3d 553,564,576; *In re Bay-Delta Programmatic Environmental Impact Report Coordinated Proceedings* (2008) 43 Cal.4th 1143,1162.)

The project description must include an accurate, stable, and consistent description of the proposed project, with sufficient specific information about the project to allow a complete evaluation and review of its environmental impacts. (14 Cal. Code Regs.§ 15124.)

Moreover, an EIR must identify and describe the project's significant environmental effects, including direct, indirect, and long-term effects. (Pub. Res. Code § 21100(b)(1); 14 Cal. Code Regs.§ 15126.2(a).)

Here, as reflected in Webb Associates' Technical Memorandum, the DEIR is deficient in that it fails to include vital information, and fails to meet the requirements of Public Resources Code sections 21001, 21002.1, 21061, 21100, and 21150, as well as 14 California Code of Regulations sections 15124, 15126.2, and 15362. For example: END COMMENT A

Channel Design

1. COMMENT B: The design work for the proposed weir structure is missing from the documentation. Based on the limited length of this structure, it does not appear that the proposed levees are high enough to contain the peak discharge of 3,800 cfs and to allow for flow over the top of the weir. As the DETR assumes zero freeboard in the levee channel system, additional analysis is required for the design of the channel system. END COMMENT B

2. COMMENT C: The Project proposes to use a levee system along both sides of the channel. Not only will the toe of the slope encroach into property owned by Mission Pacific Land Company, but the extent of that encroachment cannot be fully determined until a slope stability analysis and a levee height analysis are prepared. END COMMENT C

3. COMMENT D: The area between Evans Road and the Pen-is Valley Storm Drain ("PVSD") is proposed to be a retention basin for the PVSD. Since the channel proposes a levee along this reach, the slope stability analysis must address this condition to ensure the basin is not impacted due to slope failure. END COMMENT D

4. COMMENT E: The DEIR analysis assumes the PVSD would be empty at the time of the emergency release. Therefore, the DEIR fails to evaluate whether the weir structure would operate properly, or whether there would be additional flooding and overtopping of the levee, if the PVSD is not empty at the time of the emergency release. This would impact not only Mission Pacific Land Company's property, but the Ramona Expressway, as well. END COMMENT E

5. COMMENT F: Because the channel intersects the PVSD at a 90 degree angle, it is uncertain that the flow will stay within the PVSD or escape the PVSD on the opposite side of the channel and flood westerly, based on the limited width of the PVSD and the velocity of the emergency release flow. Even if it is shown that the flow would stay within the confines of the PVSD, additional hydraulic analysis is necessary to analyze any hydraulic effect on the weir structure. END COMMENT F

6. COMMENT G: According to the Riverside County Flood Control and Water Conservation District's Master Drainage Plan for Perris Valley, the proposed channel is along the same alignment as the regional flood control channel, Line U. The DEIR must address whether the Line U will be incorporated into the proposed DWR channel, and whether any inconsistencies exist between the Project and the Plan. (14 Cal. Code Regs.§ 15125(d).) END COMMENT G

Bridge Design

7. COMMENT H: The width assumed for the bridge at Evans Road is inconsistent with the ultimate intersection geometry for Evans Road. The bridge width will need to be increased from 104' to approximately 120' wide. END COMMENT H

8. COMMENT I: Because the channel is proposed as a levee system and the Evans Road bridge cannot touch the water surface, the bridge will need to be elevated over the current Evans Road elevation, which will require significant reconstruction of the intersection of Evans Road and Ramona Expressway. It will likely also require reconstruction of Evans Road along the frontage of Mission Pacific Land Company's property. None of the potential impacts of such reconstruction has been evaluated. Because the design work for this reconstruction is not provided, the significance of the potential impacts for this work cannot be properly identified and mitigated. END COMMENT I

9. COMMENT J: Any bridge must span the entire width of the channel, and a span of those lengths *is* infeasible without some sort of pier support. It also appears that the bridge deck elevation will need to be raised, which will require significant reconstruction of the street intersection and reconstruction of Evans Road along Mission Pacific Land Company's property. None of the potential impacts of such construction has been evaluated. Because the design work for this construction is not provided, the significance of the potential impacts for this work cannot be properly identified and mitigated. END COMMENT J

10. COMMENT K: The expansion of the Evans Road bridge width and the increased elevation of the bridge will have a significant impact on the existing utilities within the bridge footprint. The Southern California Edison transmission pole will need to be relocated outside of the bridge footprint which, due to spacing requirements, could lead to the relocation of additional SCE poles. The traffic signals and street lights also will need to be relocated as part of the intersection reconstruction. There are both potable and non-potable water lines that will require significant relocations to avoid the bridge abutments and piers. These relocations may also be affected by potential scour of the emergency release flows. While the sewer line appears to be significantly below the channel flowline, the design of the bridge abutments and piers may impact the existing facility and require that the facility either be encased in concrete or redesigned to incorporate a lift station to mitigate any potential impacts. Because the DEIR does not adequately analyze the impacts associated with the construction of the Evans Road bridge on the existing utilities in that

area and the effect on the Ramona Expressway, the significance of the impacts cannot be properly identified and mitigated. END COMMENT K

General Comments

11. COMMENT L: Although the DEIR purports to be a "project BIR," it bases the majority of the impact analysis on the ultimate build-out of the PVSD. As such, the DEIR can only be considered programmatic in nature. Program EIRs, however, are used for a series of actions-broad programmatic issues-at an early stage of the program planning. (14 Cal. Code Regs. § I 5168.) Such analysis is inappropriate when considering specific projects, as here. By proceeding in this manner, the DEIR fails to properly identify and mitigate the significance of the Project's impacts. END COMMENT L

12. COMMENT M: The DEIR fails to adequately address impacts associated with disruption of roads and utility services not only at Evans Road, but at the other locations along the Project route, as well. END COMMENT M

13. COMMENT N: The DEIR provides insufficient information about the impacts associated with the existing PVSD. END COMMENT N

14. COMMENT O: The Project Description (Chapter 2) of the Western Segment is inconsistent with previous information provided by the State. This section will require the construction of levees west of Lake Perris Drive. END COMMENT O

15. COMMENT P: Figure 3.9-3 indicates that the new inundation area will expand beyond that of the existing inundation area. The potential impacts of that expansion have not been analyzed. END COMMENT P

16. COMMENT Q: Impact 3.9-3 does not analyze the potential for erosion of the existing PVSD which could create a significant impact that requires mitigation and additional environmental analysis. END COMMENT Q

17. COMMENT R: Impact 3.9-4 does not address the potential for additional surface water impacts to Lhe surrounding area due to an emergency release into the existing PVSD. END COMMENT R

18. COMMENT S: Impact 3.9-7 does not address the potential significant impacts associated with the existing condition of the PVSD and the potential for erosion, which could contribute to polluted runoff. END COMMENT S

19. COMMENT T: Impact 3.9-9 does not account for the impacts associated with the new inundation areas, which are vulnerable to flooding because they have existing development or approved developments within them. END COMMENT T

20. COMMENT U: Impact 3.9-11 provides only a qualitative discussion of impacts as a result of an emergency release. Although the DEIR indicates that impacts can be minimized through the operation and maintenance of the facility, it does not provide an in-depth review of the impacts associated with a full release on the existing condition. Until this information is provided, the significance of the impact cannot be known. END COMMENT U

21. COMMENT V: Impact 3-12.4 does not adequately address the potential impacts associated with the relocation of existing utilities in Evans Road and the potential reconstruction of the intersection at the Ramona Expressway and Evans Road as a result of the bridge crossing the Western Segment. Because the design work for this work is not provided, the significance of the potential impacts of this work cannot be properly identified and mitigated. END COMMENT V

22. COMMENT W: Mitigation Measures TRANS-1 in section 3.14, does not provide for the potential measures needed for the phased construction of the bridge on Evans Road. END COMMENT W

23. COMMENT X: The alternatives analysis is deficient. There is no analysis of (i) alternate locations for the Project, or (ii) an alternative that modifies any of the Western Segment of the Project.

In addition - and this is one of its most glaring shortfalls - the DEIR does not address any of the impacts resulting from the proposed full closure of Evans Road to construct the bridge. END COMMENT X

24. COMMENT Y: The DEIR also fails to address the need for property acquisition or easements for construction access and staging areas. None of these long-term or short-term impacts have been addressed. END COMMENT Y

COMMENT Z: Accordingly, the DEIR must be supplemented to address the above issues and recirculated for further public review and comment prior to certification. (14 Cal. Code Regs. §§ 15088.5.)

Please be aware that Mission Pacific is continuing to review the DEIR, and will have additional comments to present prior to agency action on the Project. Lastly we request a meeting with representatives of DWR to discuss these and related issues. END COMMENT Z

Very truly yours,

RUTAN & TUCKER, LLP

John Ramirez

JR:sa
Enclosures: (i) Webb Engineering Memorand u , (ii) Webb

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ALBERT A. WEBB ASSOCIATES

W.O. No. 2013-0159

Technical Memorandum

To: John K. Abel, Mission Pacific Land Company

From: Scott R. Hildebrandt, P.E., Senior Vice President

Date: December 18, 2015

Re: Evaluation of the Proposed DWR Outlet Channel for the Lake Perris Emergency Release Facility

COMMNENT AA: WEBB Associates has reviewed the information provided by Ms. Delia Grijalva of the Department of Water Resources (DWR) for the proposed DWR Outlet Channel for the Lake Perris Emergency Release Facility. The channel as presented would extend from the connection at the Perris Valley Storm Drain (PVSD) easterly along the Ramona Expressway alignment to a point just east of the Perris Valley Fairgrounds. The portion of the channel between the PVSD and Lake Perris Drive (approximately 2600') is directly adjacent to property owned by the Mission Pacific Land Company. The information provided by the DWR is very preliminary in nature and additional information will be necessary to address all the constraints associated with the design.

Our review focused on the potential design constraints that the channel should address and potential impacts to the Mission Pacific Land Company property. In addition to the preliminary plan and profile for the channel, channel cross-sections and limited hydraulic information was provided. DWR also indicated that bridge crossings can have no contact with the water surface and must span the entire channel. Based on this information, we have the following comments: END COMMENT AA

Channel Design

1. COMMENT BB: The preliminary design information for the proposed weir structure is missing from the documentation. Based on the limited length of this structure, as shown on the provided documentation, it does not appear that the proposed levees are high enough to contain the peak discharge of 3,800 cfs and to allow for flow over the top of the weir. As the DWR assumes zero freeboard in the levee channel system, this will require additional analysis for the design of the channel system. END COMMENT BB

2. COMMENT CC: The preliminary design proposes to use a levee system along both sides of the channel. As the proposed grading currently depicts, the toe of slope would encroach into property owned by Mission Pacific Land Company. Additionally, until such time that a slope

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stability analysis and the levee height analysis can be determined, the extent of the encroachment into Mission Pacific Land Company property cannot be fully determined. END COMMENT CC

3. COMMENT DD: The area between Evans Road and the PVSD is proposed to be a retention basin for the PVSD. Since the channel proposes a levee along this reach, the slope stability analysis will need address this condition so the basin is not impacted due to slope failure. END COMMENT DD
4. COMMENT EE: Based on the hydraulic information and channel design information provided, it appears that the DWR assumes that the PVSD is empty at the time of the emergency release. If the PVSD is not empty at the time of the emergency release, then the weir structure may not operate properly and additional flooding as a result of overtopping the levee may occur. This could not only impact Mission Pacific Land Company's property, but may also impact Ramona Expressway. END COMMENT EE
5. COMMENT FF: The channel plans depict the channel intersecting the PVSD at a 90 degree angle. Based on the limited width of the PVSD and the velocity of the emergency release flow, it is uncertain that the flow will stay within the PVSD or escape the PVSD on the opposite side of the channel and flood westerly. In the event the flow does stay within the confines of the PVSD, additional hydraulic analysis will be necessary to analyze any hydraulic effect on the weir structure. END COMMENT FF
6. COMMENT GG: According to the Riverside County Flood Control and Water Conservation District's Master Drainage Plan for Perris Valley, the proposed channel is along the same alignment as the regional flood control channel, Line U. The DWR will need to provide direction on the intent of incorporating Line U into the proposed DWR channel. END COMMENT GG

Bridge Design

1. COMMENT HH: The bridge width shown on the preliminary documents are not consistent with the ultimate intersection geometry for Evans Road. Based on our information, the bridge width will need to be increased from 104' to approximately 120' wide. END COMMENT HH

2. COMMENT II: Since the channel is proposed as a levee system and the DWR has indicated that any bridges cannot touch the water surface, this means that the bridge will need to be elevated over the current Evans Road elevation. This may require significant reconstruction to the intersection of Evans Road and Ramona Expressway and may also require reconstruction of Evans Road along the frontage of Mission Pacific Land Company's property. END COMMENT II

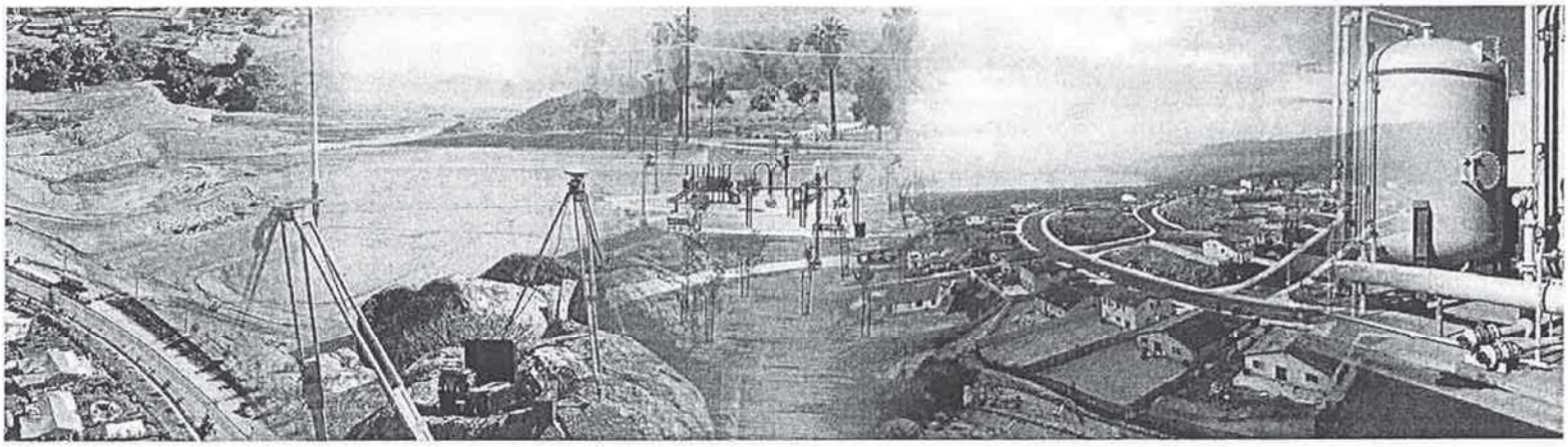
3. COMMENT JJ: The DWR has also indicated that any bridge must span over the entire width of the channel. A bridge span of the length, estimated from the preliminary documentation, does not seem feasible without some sort of pier support. Based on our preliminary review of the information, we have estimated either a slab bridge with piers at 40' on center or a precast girder bridge with a single center pier. We have also developed an estimated water surface elevation over the weir based on the preliminary information at the bridge as an elevation of 1454.0. Assuming one foot of freeboard under the bridge and a bridge deck thickness ranging from 1.5' to 6' based on the type of bridge, the bridge deck elevation will need to be between elevation 1456.4 and 1461.0. The existing elevation of the intersection of Evans Road and Ramona Expressway is approximately 1452.0. As mentioned previously, this will require significant reconstruction of the street intersection and reconstruction of Evans Road long Mission Pacific Land Company's property. END COMMENT JJ

COMMENT KK: 4. The expansion of the bridge width and the increased elevation of the bridge will have a significant impact on the existing utilities within the bridge footprint. The Southern California Edison (SCE) transmission pole will need to be relocated outside of the bridge footprint. Due to spacing requirements, this could lead to the relocation of additional SCE poles. Additionally, the traffic signals and street lights will need to be relocated as part of the intersection reconstruction. There are both a potable and non-potable water lines that will require significant relocations to avoid the bridge abutments and piers. These relocations may also be affected by potential scour of the emergency release flows. While the sewer line appears to be significantly below the channel flowline, the design of the bridge abutments and piers may impact the existing facility and require that the facility either in encased in concrete or redesigned to incorporate a lift station to mitigate any potential impacts. END COMMENT KK

COMMENT LL: Based on our review, we would recommend that a coordination meeting be arranged with the DWR, the City of Perris, the Riverside County Flood Control & Water Conservation District, and Mission Pacific Land Company to review the proposed channel and establish design constraints to facilitate the design process.

If you have any additional questions regarding this analysis, or need any additional back-up information, please give me a call at (951) 686-1070. EJD COMMENT LL

ALBERT A.
WEBB
ASSOCIATES



STATEMENT OF QUALIFICATIONS
CIVIL ENGINEERING & PLANNING SERVICES

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ME LD SE TT PE MF CMI LSM LA GIS

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SERVICES / PROJECT PROFILE KEY

- ME Municipal Engineering
- LD Land Development
- SE Stormwater Engineering
- TT Traffic & Transportation
- PE Planning & Environmental
- MF Municipal Finance
- CMI Construction Management & Inspection
- LSM Land Survey & Mapping
- LA Landscape Architecture
- GIS Geographic Information Systems

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FIRM OVERVIEW

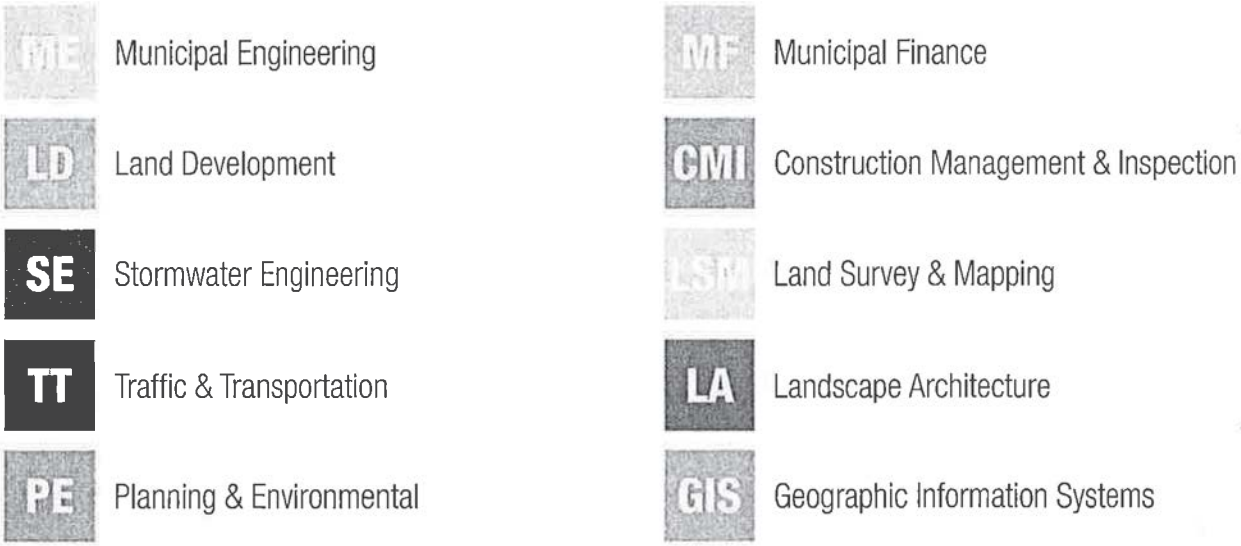
Albert A. Webb Associates (WEBB) has consistently provided civil engineering and planning services to public and private sector clients throughout Inland Southern California since 1945. We have the in-house expertise to address the needs of cities, water and special districts, counties, regional agencies, municipal finance agencies, residential developers, commercial/industrial developers, and our partner firms within the industry. WEBB offers a broad range of services to meet the objectives of our clients which includes project development, planning, design, entitlement, funding, permitting, construction management, inspection, ongoing maintenance, and operation.

WEBB specializes in the following market sectors:

- **Water Agencies**
- **City Agencies**
- **County/Regional Agencies**
- **Residential Developers**
- **Commercial/Industrial Developers**
- **Municipal Service Agencies**

SERVICES

Our clients reap the benefits of our team's approach to client service. WEBB's reputation for superior quality work, integrity, and long-standing client relationships is a direct result of our industry proven capabilities and experience. We are proud of the name WEBB as it has become synonymous with experience and customer service.



WEBB understands the expectations and assumed responsibility that our clients require of its consultants. We will provide complete and comprehensive services while helping our clients reach their goals for each project. Our goal is to ensure that our clients exceed the expectations of all constituents with a vested interest in each project. We understand that our work and actions impact the public's perception of our clients.

MANAGEMENT PHILOSOPHY

WEBB understands the absolute need for strong project management. We recognize the critical issues associated with schedule, budget management, and communication. Communication and coordination between an engineering consultant and the client is paramount to each project. To guarantee continuous and effective communication, a project manager will be assigned to each project to serve as the primary point-of-contact to the client and a principal-in-charge will be monitoring the process as a whole. Our project manager makes it a priority to attend all meetings between the client and the project proponents during the project. This will ensure a constant and effective way of communication resulting in strong budget and schedule control.

Management Responsibilities and Procedures

A WEBB principal will be the direct point-of-contact with the client's project manager for all contractual matters focusing on resolving any critical contract issues as soon as they are identified. Our principals have the authority to commit firm resources and will support the project manager in managing the overall scope, schedule, and budget. Our principals' experience on large multi-disciplinary projects has trained them to look forward to identify and prevent potential delay-causing issues.

The project manager will be responsible for the day-to-day project and technical management which includes:

- Facilitating frequent and consistent communications with the client
- Implementing the overall delivery plan
- Managing the overall scope, schedule, and budget
- Implementing the QA/QC program
- Overseeing the project controls staff for timely project management reports

The project manager will be responsible for facilitating final decisions by the client, coordination, management, communicating to the project team and client project manager, preparing and reviewing design deliverables, and directing design support service disciplines and specialty subcontractors. WEBB's project manager will assist in presenting the technical work at meetings and documenting action items and decisions.

The Team QA/QC and Project Management Plan will facilitate successful project execution. Management tools, procedures, and a delivery plan are all contained in a comprehensive Project Methodology Plan that is prepared at the beginning of the project and is updated throughout the project. Having a comprehensive and detailed Project Management Plan is essential for delivering a major design project with an integrated team consisting of the client, multiple stakeholders, multiple disciplines, and many deliverables. Client input into the plan will be essential to make certain it is an effective tool, adequately used, and meets your needs. An outline of the Project Management Plan and some initial comments and items to be included, in addition to our detailed Communication Plan, are as follows:

Kick-off Meeting - Initial Design Workshop

After project award and notice-to-proceed, our project team will conduct a Kick-off Meeting and Initial Design Workshop with all members of the project team and key client staff. The workshop is structured to establish communication protocols for the project, as well as to identify critical success factors and processes, activities, and tasks that must be carried out to achieve the goals. The workshop is an important step to ensure all parties are focused on the same project goals and help clarify the critical path issues, key outside stakeholders, milestones, and third party approvals.

Scope Management

A detailed Work Breakdown Structure (WBS) is typically included in our fee budget proposal and will be utilized for the project duration with detailed tasks. With input from the client, the scope will be finalized and adopted for the overall project. During the execution of the project, the scope will be utilized as a baseline by our project manager, who will manage the scope and work product. If potential changes are identified as the project develops, our project manager will work with the client to clarify and approve any additional tasks necessary to complete the project.

Schedule Management

A preliminary schedule will be prepared, provided, and discussed. In collaboration with the client, the project schedule and milestones will be evaluated and modifications will be made to set the final baseline schedule during the initial project kick-off process. The baseline schedule will be monitored and tracked by our project manager to maintain the project milestones and manage critical path items. A tracking schedule will be provided with monthly updates and all schedule variances identified. Actions required to correct schedule deviations will be developed and implemented by the team. The project schedule is an effective management tool when developed and maintained to guide the design team through the tasks required to successfully complete a project. WEBB uses Microsoft Project software to schedule and track project tasks.

Cost/Budget Management Plan

The proposed project budget will be prepared based on tasks required to successfully complete the project. Our project manager will track the final budget compared to the actual earned value, task completion, and cost-to-date and will identify any project cost variance monthly. Corrective actions will be taken to maintain the project budget. If changes to the scope and budget are deemed necessary, our project manager will work with the client to justify the need and clearly define the impacts.

Communication Plan and Management

Communication between all team members and the client is critical to its success. A key differentiator between our project team and our competitors is our physical location and our ability to meet with the clients and stakeholders quickly. We are committed to providing consistent communication by having required members of the project team available for all client meetings.

Issue Management/Risk Management

The tracking of project issues and management of risks is facilitated through a tracking log and available to the client and the project team. With issues being raised through email, phone calls, and meetings throughout the duration of the project, having a centralized document ensures project impacts are identified, logged, assigned, analyzed, acted upon, and addressed as part of the design process.

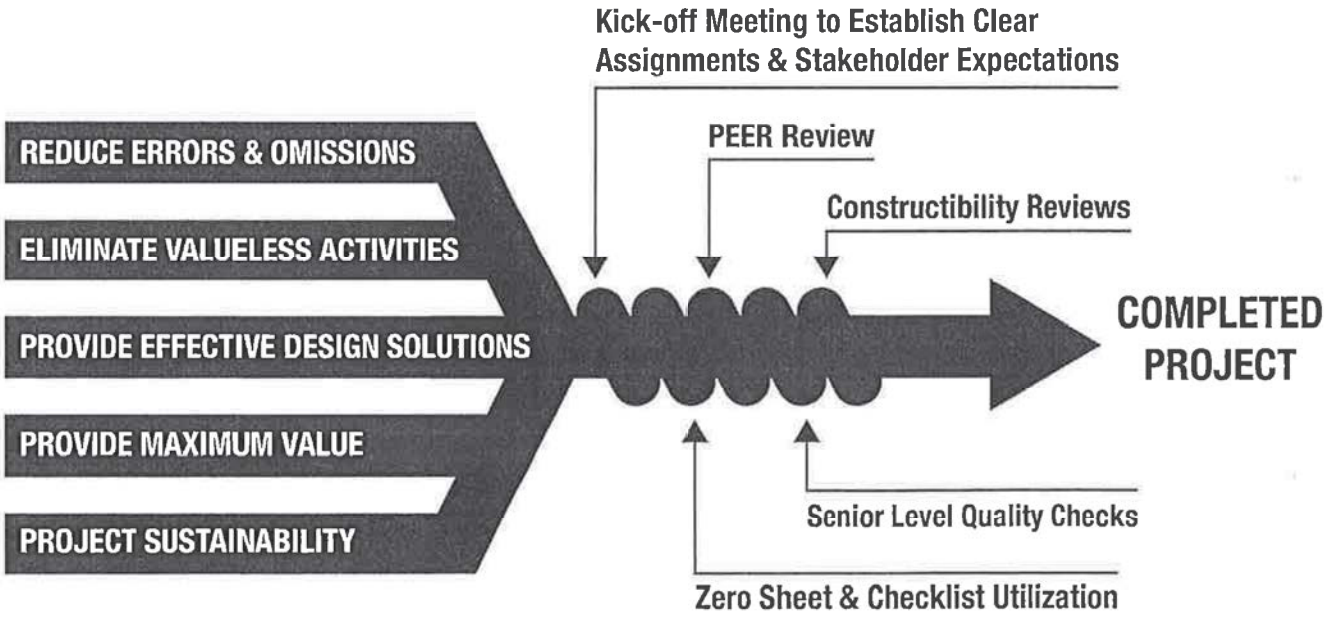
QUALITY MANAGEMENT

WEBB has established an extensive in-house Quality Assurance/Quality Control (QA/QC) program that all project managers must conform to for all of our projects. This program is overseen by our chief operations officer, who continually monitors compliance with our in-house QA/QC Program. Our team utilizes WEBB's detailed approach to quality assurance and quality control. It demands that our principal leaders rigorously scrutinize every critical aspect of a project. Our quality assurance begins with developing a close and continuous line of communication between the design team and the client. Our past experience indicates that good communication is a critical element to project success. Under our project protocol, we keep an organized directory of all project-related communication, meeting minutes and action items, documents, images, data, and plan sets which allows us to respond quickly to requests. We will seek the input of operations and engineering staff throughout the project development to ensure the project meets the needs of the client.

The quality control for all projects is imbedded in every stage of the project development. Our QA/QC Program is designed to enhance the cooperation and synergy between the disciplines in-house, our design teams, sub consultants, and the client. Our entire staff is part of the QA/QC Program and each plays a significant role in its implementation. As an underlying principle of our QA/QC Program, WEBB will utilize senior level staff to review the work product to utilize the experience and knowledge to each aspect of the project. By bringing these disciplines together early in the project, we are able to recommend the best project alternative and develop a list of critical design issues that need to be addressed as detailed design is implemented.

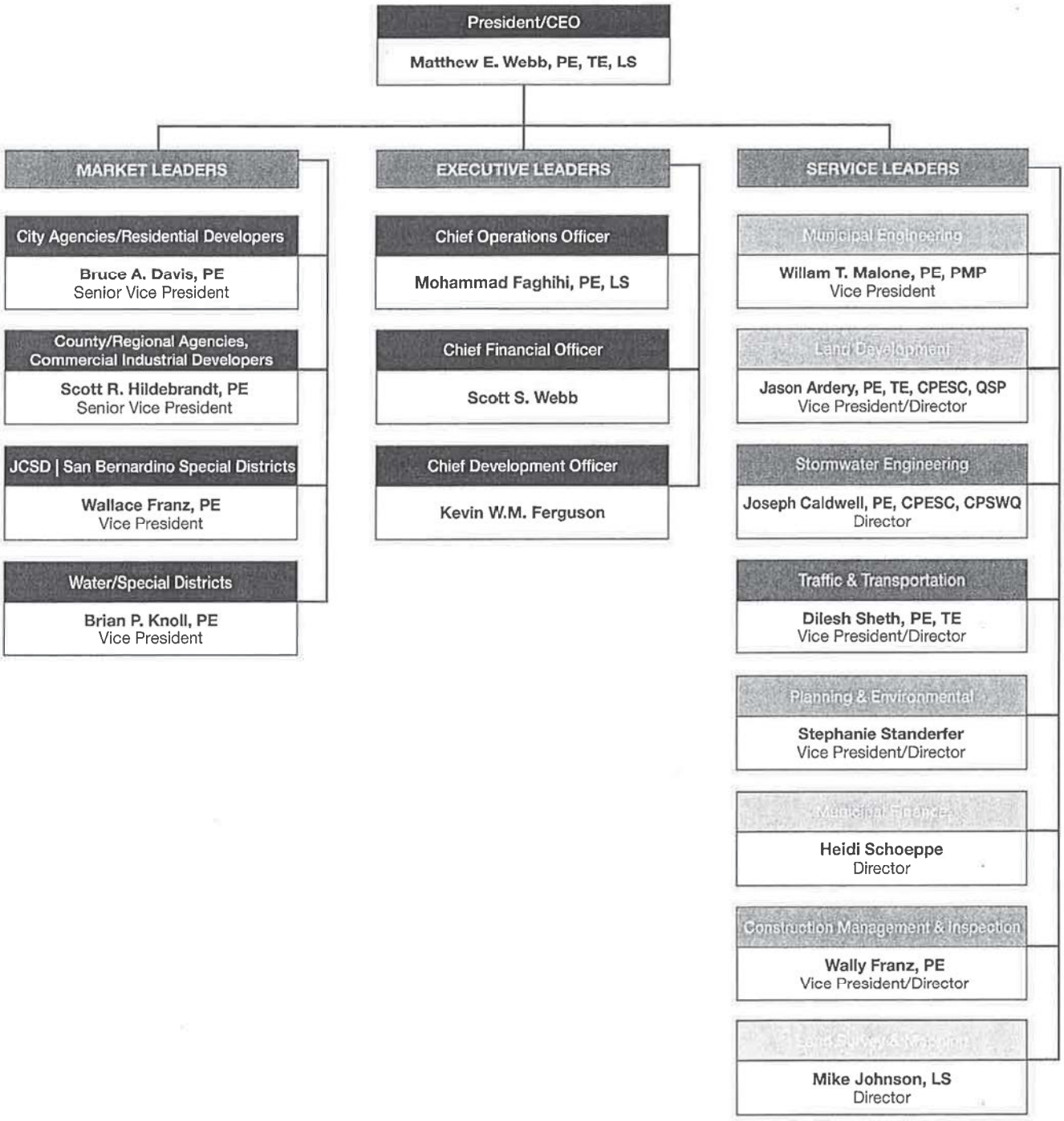
After the preliminary design has been developed, the project will receive a comprehensive internal peer review prior to submittal. The peer review panel consists of WEBB professionals apart from the design team. This peer review will be utilized to ensure the preliminary design is clear, concise, comprehensive, and most importantly, meets the objectives of the client. Final approval at 100% is achieved only after the associate responsible for each portion of the project signs off on our internal QA/QC approved document, known as the "Zero Sheet", prior to submittal to the client.

QA / QC PROCESS



FIRM LEADERSHIP

The following organization chart provides an overview of the knowledgeable leaders that oversee our corporate operations, market sectors, and service departments.



EXECUTIVE & CORPORATE LEADERSHIP

Matthew E. Webb, PE, TE, LS
President/CEO

Matthew E. Webb, is the President/CEO and member of the Board of Directors for Albert A. Webb Associates (WEBB). Matt began his career with WEBB in 1981 and has served as President/CEO since 1999.

Matt's extensive knowledge and experience in the areas of civil engineering, traffic engineering, land surveying, planning, environmental services, and municipal finance make him a highly sought-after consultant and expert witness representing both public and private clients throughout Southern California.

Due to his experience as an expert witness on matters pertaining to civil engineering, site development, and eminent domain, Matt has been asked to speak at numerous conferences and programs and to serve as a Guest Lecturer for the University of California, Irvine and the University of California, Los Angeles.

As a life-long resident and advocate for Inland Southern California, Matt spends much of his time representing the citizens of this region on a variety of issues related to transportation, the environment, planning, and civil engineering before local, state, and national representatives.

Mohammad Faghihi, PE, LS
Chief Operations Officer

Mo Faghihi is the Chief Operations Officer for Albert A. Webb Associates (WEBB). Mo is a registered civil engineer and a licensed land surveyor in the state of California. He is responsible for the internal operations of the firm, providing leadership and management to the firm's service department directors to ensure there is optimal manpower and technical resources necessary for the overall efficient management of projects.

Mo has had overall responsibility for residential land planning for the past 25 years including tract maps for single family homes, condominiums, senior housing projects, and apartments. His expertise also extends to mixed use specific plans and associated future facilities from planning through design. He has planned and designed over 100 residential projects including 10,000+ units throughout Inland Southern California and the Desert Region for private and publicly owned companies. Mo has managed the design of infrastructure improvements in excess of $100 million encompassing 10,000+ acres throughout Inland Southern California. He has also managed major public works projects focused on regional and local transportation corridors, local roadway infrastructure, and regional and local drainage facilities.

Mo is recognized throughout the industry for his exceptional ability to expedite government approvals through coordination with local agencies and jurisdictions, as well as planning and transportation staff.

Scott S. Webb
Chief Financial Officer

Scott joined the firm in 1984 and serves as the Chief Financial Officer. He is responsible for all financial and business operations of the firm.

Kevin W.M. Ferguson
Chief Development Officer

Kevin Ferguson serves as the Chief Development Officer at Albert A. Webb Associates (WEBB) and is dedicated to driving strategic growth through organizational planning and talent development. As a collaborative leader, Kevin uses his unique public and private background to develop organizations both internally and externally.

His experience in organizational leadership, strategic facilitation and planning, professional recruitment and talent enrichment, as well as business development and marketing, enables him to lead organizations ensuring long-term operations while realizing maximum profits compatible with quality work and sustainable growth.

MARKET LEADERS

Bruce A. Davis, PE
Senior Vice President

Bruce Davis is a Senior Vice President at Albert A. Webb Associates (WEBB). Bruce's breadth of experience and in-depth technical and professional background with both public and private projects make him a well-versed consultant with the ability to serve the best interests of both public agencies and private clients. Bruce's past experience has allowed him to be successful in a number of large and complex projects over the last 28 years. His unique ability to understand the planning and civil engineering needs of a project, coupled with his uncanny ability to mediate problems and find creative solutions with all constituents involved, makes him a highly sought after consultant.

Bruce has served as the Principal-in-Charge for hundreds of planning, design, and regional infrastructure and development projects. He has extensive public works experience with water/wastewater facilities, traffic, transportation, and drainage projects. Bruce's private sector experience includes the planning and design of specific plans, large and small scale residential and commercial developments, and special financing districts. His extensive experience translates to an understanding of all the steps required to successfully complete a project efficiently and on schedule from inception to completion.

As a principal with the firm, Bruce has complete access and the ability to manage resources in all disciplines within the firm including but not limited to planning and environmental services, water resources, traffic and transportation, drainage, special tax and assessment consulting, residential development, commercial and industrial development, construction management and inspection, survey, mapping, and GIS. Bruce also has a unique ability to lead and manage client staff when called upon, which has been exhibited through his past involvement with other clients.

Scott R. Hildebrandt, PE
Senior Vice President

Scott Hildebrandt is a Senior Vice President at Albert A. Webb Associates (WEBB) and a Market Leader for regional and county agencies, as well as commercial and industrial developers. He is a recognized expert in the disciplines of drainage, hydrologic, and hydraulic planning and design services. Scott has a well-rounded knowledge of the engineering industry which allows him to oversee our educational, recreational, and commercial/industrial facility projects and contribute his expertise to our healthcare projects. This experience has led to his reputation as a trusted advisor for the design of multi-discipline projects that intersect multiple market sectors. Scott specializes in large, complex projects where attention to detail is critical.

As a market leader, Scott is instrumental in the marketing and business development aspects of our company. He is responsible for a number of the key client relationships as well as researching and creating new relationships in key geographic areas and with target clients.

Scott has been instrumental in providing the 14,000+ residents of the private Canyon Lake Community with parks, infrastructure, and a 40+ mile roadway system as Corporate Engineer for the Property Owners Association. He has planned and designed hundreds of major public infrastructure projects including transportation, sewer and water systems, storm drains, and utility tunnels. He has also developed close working relationships with local, state, and federal regulatory agencies and he understands how to expedite approvals from multiple agencies to effectively push projects forward.

Wallace Franz, PE
Vice President

Wallace "Wally" Franz, Vice President and Market Leader for Albert A. Webb Associates (WEBB), has 40 years of diverse experience within the civil engineering field. He began his career as a structural engineer with a large international design and construction company, then performed land development engineering for a small Inland Southern California firm, and has spent the last 35 years working with WEBB as a project engineer, inspector, project manager, and principal-in-charge of projects primarily focusing on water resources and construction management and inspection.

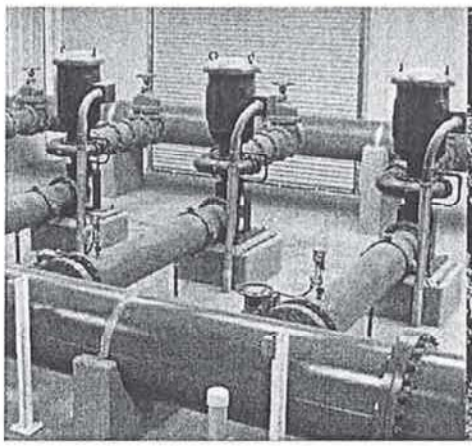
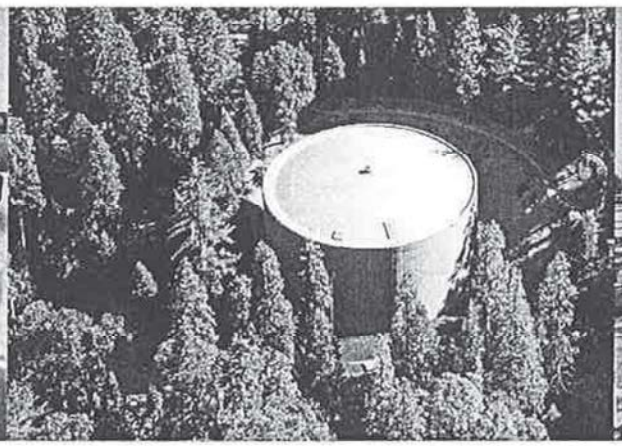
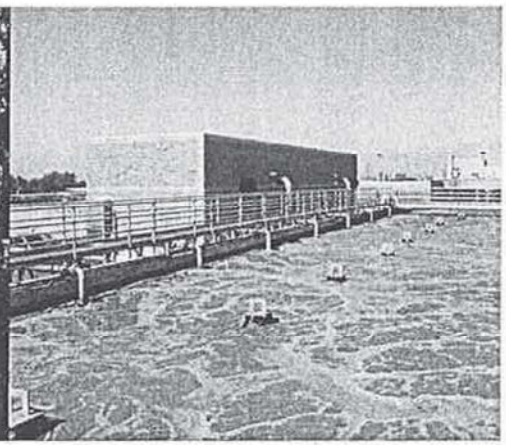
Wally's attributes include "hands-on" involvement with projects under his purview, excellent personal relationship skills, a low key approach to problem solving, and listening to client input and feedback to develop practical solutions to concerns and questions that may arise during the course of a project.

Brian P. Knoll, PE
Vice President

Brian Knoll is a Vice President at Albert A. Webb Associates (WEBB) and Market Leader for Water Agencies/Special Districts and Partnerships. He has been responsible for the design and direction of capital improvement projects totaling more than $300 million throughout Inland Southern California.

Brian's expertise lies in planning, design, and construction oversight of water and wastewater facilities. Over the past 12 years, Brian has been involved in numerous water and wastewater treatment plant projects including the City of Riverside's 26 MGD expansion of their water quality control plant, the 6 MGD expansion of the Western Riverside Wastewater Treatment Plant, and the 6 MGD expansion of the Calipatria Water Treatment Plant.

ALBERT A.
WEBB
ASSOCIATES

ME MUNICIPAL ENGINEERING

With 69 years of experience, it's no surprise that WEBB has been instrumental in the planning, design, and implementation of many of the region's critical infrastructure systems. To better serve our clients, WEBB established multiple service departments to provide in-house master planning and design services for pipelines, treatment plants, pump stations, potable and non-potable storage, and backbone facilities. We have often provided dedicated inspectors and resident engineers who have gone on to provide operations and maintenance training as part of our construction support services.

WATER

- Production Wells
- Pump Stations
- Water Treatment Plants
- Wellhead Treatment
- Distribution and Transmission Pipelines
- Storage Reservoirs
- Pressure/Flow Control Facilities

WASTEWATER FACILITIES

- Collection and Interceptor Systems
- Lift Stations/Pump Stations
- Wastewater Treatment Plants
- Recycled Water Conveyance Systems
- Recycled Water Pump Stations
- Biosolids Processing Facilities
- Construction Management

PLANNING & DESIGN

- Water, Wastewater, and Hydrological Modeling
- Energy Management Systems
- Feasibility Studies
- Pre-Design Reports (PDR)
- Preparation of Design Plans & Specifications
- Project Budgeting
- Rate Studies and Revenue Programs
- Public Grant/Loan Funding
- Plan Checking
- Rehabilitation Studies and Recommendations for Improvements

MUNICIPAL ENGINEERING

William T. Malone, PE, PMP
Vice President

William "Bill" Malone, Vice President at Albert A. Webb Associates (WEBB), is a specialist in water and wastewater projects ranging from planning to design and construction. Bill's experience includes but is not limited to major water transmission mains, water distribution mains, sewer trunk lines, sewer collection mains, water pump stations, water wells, sewer lift stations, major water turnout metering facilities, sewer metering and monitoring stations, water storage reservoirs, and water and sewer system master plans.

Bill's planning and design responsibilities include hydraulic analysis of sewer and water systems, master facility plans, engineering feasibility studies, preparation of design drawings and project specifications, preparation of construction and project cost estimates. As a contract administrator and construction manager, Bill reviews bid proposals, contractor's submittal drawings, he coordinates with clients, contractors, and inspectors regarding engineering decisions during construction, reviews and processes construction progress payments, and executes contract change orders.

Dave M. Algranti, PE
Chief Design Engineer

Dave Algranti is Chief Design Engineer at Albert A. Webb Associates (WEBB) and has over 41 years of experience in the planning, design, and construction of water resources projects. His impressive knowledge of water-related systems has elevated him to the position of a technical advisor for projects related to water resources' project teams and clients of WEBB. He has been instrumental in developing WEBB's quality management program. He coordinates and directly performs project quality assurance/quality control for the more critical aspects of project design with the objective that technical issues are recognized early and resolved efficiently by an expert within the firm.

Dave has authored and coauthored the preparation and development of standard manuals and specifications for public water and sewer agencies including organization and procedural requirements, systems and design centers, technical specifications for materials and construction, and development of standard drawings for construction.

Sam I. Gershon, RCE
Senior Vice President

Sam Gershon is a Senior Vice President at Albert A. Webb Associates (WEBB). He holds professional civil engineering registrations in the states of California, Nevada, and Arizona, as well as a professional agricultural engineering registration in California. Sam has enjoyed longstanding relationships with southern California water districts and public agencies. His distinctive knowledge of our client's goals, challenges, and political stances has positioned him as a leader and a liaison between our clients and the firm.

Bradley Sackett, PE
Senior Engineer

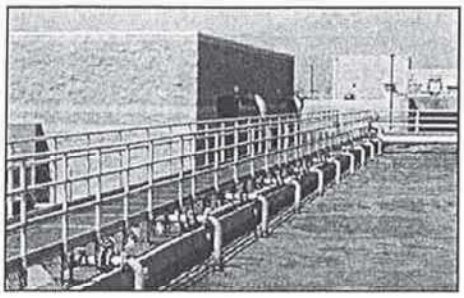
As a Senior Engineer at Albert A. Webb Associates (WEBB) Brad Sackett specializes in water resource projects for public agencies which include but are not limited to pumping facilities, water pipeline design, gravity sewer main design, water and sewer system master plans, hydraulic modeling analysis, and sewer resource plans for Specific Plan EIRs. Brad is a client leader and project manager for both water districts and cities and has been instrumental in assisting clients with in-house projects while representing these agencies with their constituents as an on-site consultant. Throughout Brad's career, he has been intricately involved in the design, management, and construction support of projects.

Siming Zhang, PE
Senior Engineer

As a Senior Engineer at Albert A. Webb Associates (WEBB) in the Public Works Department, Siming Zhang has managed and designed public works projects consisting of water storage reservoirs, water transmission pipelines and booster stations, major trunk sewer main, sewer collection pipelines and sewer lift stations, and water booster stations. Siming has also been involved in many land development projects including master drainage plan, CLOMR/LOMR, hydrology/hydraulic studies, and storm drain design. He is currently a project manager and leader of a team of engineers and designers.

Shane Bloomfield, PE
Senior Engineer

As a Senior Engineer in the Public Works Department at Albert A. Webb Associates (WEBB), Shane specializes in the design of public works projects consisting of major pumping plants, groundwater pumping wells, sewer collection system design, wet well rehabilitation, water distribution system design, wastewater treatment plant design, and hydraulic system modeling using various computer models. He has engineering design responsibilities for several projects for public works agency clients including the City of Ontario, City of Riverside, Jurupa Community Services District, Eastern Municipal Water District, and Crestline-Lake Arrowhead Water Agency.



WRCRWA - Aeration Upgrade and Expansion Project
Riverside

GIS

- Upgraded to 13.25 MGD
- Operating Facility
- Thickening
- Sludge Storage
- Dewatering
- Truck Access Improvements

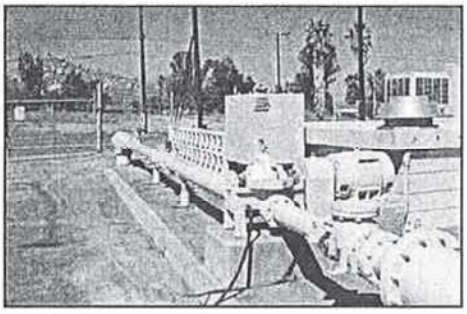
Western Municipal Water District Pipeline Projects
County of Riverside

TT

- 34,000 LF 24-inch non-potable water conveyance
- 20,000 LF 8-inch MARB groundwater recovery pipeline
- 2,600 LF 16-inch Lake March Bypass/Village West pipeline
- 2,500 LF 12-inch Wood Road irrigation pipeline
- 42,000 LF 8-42-inch WMWD Master Facility
- 6,100 LF 30-inch Oleander pipeline

Ontario Wells Nos. 40,41,45,46,47,49, & 50
City of Ontario

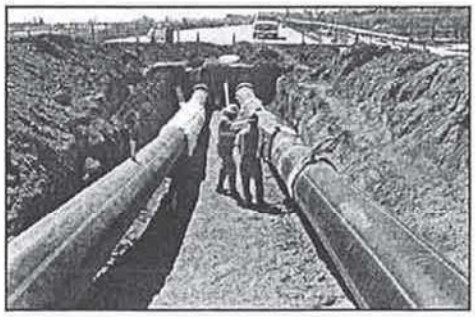
- Engineering and hydrogeology services with 7 high-capacity ground water production wells
- Evaluation of 2 well sites based on hydrogeologic and engineering parameters
- Complete civil, mechanical, electrical, and architectural design plans and specifications
- 800HP electric motors and 1 MW standby diesel generator
- Construction management and inspection services



Vista & Ellis Zones Water System Improvements
Riverside County

LA PE LD GIS

- 2,400 GPM Booster Station
- Chloramine Disinfection Facilities
- 5.6 MG Welded Steel Water Storage Tank
- 17,1001LF of 18-in and 24-in Diameter Transmission Mains



Jurupa Community Services District Sewer Bond Projects
Riverside

TT LA CMI SE PE GIS

- Van Buren Bridge Forcemain Crossing – 2,400 LF of 24-in Diameter Sewer
- Florine Sewer Lift Station, 3,500 LF 10-in Diameter Gravity Main and Forcemain
- Upgrades and Enhancements to Electrical/Scada Plant 1
- Regional Forcemain to City of Riverside WWTP – 17,600 LF of 24-in Diameter Forcemain and 2,200 LF of 27-in Diameter Gravity Sewer
- Pyrite Creek Trunk Sewer – 10,300 LF of 30-in and 36-in Diameter, 7,200 LF of 8-in to 21-in Diameter Sewermain, 3,000 LF of Slipling and Small Sewer Lift Station
- Jurupa Road Trunk Sewer – 14, 600 LF of 10-in, 18-in and 21-in Diameter Sewermain
- Sky Country Trunk Sewer – 8,100 LF of 12-in and 18-in Diameter Sewermain
- Regional Sewer Lift Station – 7,500 GPM, 750 HP Capacity

PIPELINE DESIGN PROJECTS				
LF of Water Main	Diameter (inches)	Client /Project	Client	Comments
Raw Water/Recycled/Non-Potable				
47,500	24	City of Banning Irrigation Pipeline	COB	
9,000	16~24	Chino 1 Raw Water Pipeline	CDA	Prop 13 Funded
30,000	16~36	Chino 2 Raw Water Pipeline	CDA	Large Diameter PVC Pipe
3,000	24	Chamber Recycled Pipeline	EMWD	EMWD Recycled Water
34,000	24	Non-Potable Water Conveyance	WMWD	EJ Meyers Contractor/Prop 13
20,000	24	Menifee Desalter Pipeline	EMWD	
50,000	10~24	Perris Desalter Pipeline	EMWD	
20,000	8	MARB Groundwater Recovery Pipeline	WMWD	
Potable Water Lines				
24,000	24~42	Milliken Ave. Water Transmission Mains	Ontario	Congested Streets
33,000	36	8th Street Water Transmission Main	Ontario	Congested Residential Streets
8,000	24	Chino 1 – Chino 2 Inter-tie	JCSD	EJ Meyers Contractor
13,000	36~42	Etiwanda/Bellegrave Water Main	JCSD	Large Diameter Pipelines
52,000	30	Arlington Desalter Pipeline	SAWPA	DIP Pipe/Recycled Water Added
50,000	24 & 30	JCSD/Product Water Pipeline	SAWPA	EJ Meyers Contractor
42,000	8~42	WMWD Master Facility	WMWD	Master Planned Facilities
6,000	12~18	Assessment District No. 20	EMWD	Regional Facilities
18,000	12~18	Barton-Nandina Interagency Connection	EMWD	Including Metering Facility
Studies and Evaluations				
		Perris Valley Transmission Alignment Study	EMWD	Review of Area Utility Corridors
		Sun City LS Bypass Plan	EMWD	LS Hydraulics Evaluation
		La Sierra Pipeline Alignment Study	WMWD	38,000 LF of 30-in to 42-in Pipeline
		Mills to Lurin Pipeline Alignment	WMWD	19,000 LF of 36-in Pipeline
		Riverside Corona Feeder	WMWD	34 Miles of 30-in to 76-in Pipeline
Wastewater Pipelines				
15,000	21~30	Haun Road Sewer	EMWD	Flood Control Channel Alignment
80,000	21~42	Eastvale Interceptor Sewer	JCSD	Large Diameter/Deep Cuts
46,000	8~15	Areas B, C, E, and L	MSWD	State/Federal Funding
35,000	8~30	Assessment District No. 20 Sewer	EMWD	
32,000	8~27	Mission Ranch CFD No. 15 Sewer Main	WMWD	
13,000	6~8	Mission Ranch CFD No. 15 Force Main	WMWD	Long Force Main
15,000	12	Cajalco Sewer Force Main	WMWD	Long Force Main
4,100	18	Parsons Road Gravity Sewer	WMWD	
17,000	18	City of Holtville Outfall Sewer Pipe	COH	BECC Funded
Brine Lines				
24,000	18~24	Non-Reclaimable Waste Line	GE	EJ Meyers Contractor
35,000	24 & 30	Temescal Valley Regional Interceptor	SAWPA	PVC/HDPE Pipe/SRF

WATER & WASTEWATER TREATMENT PLANTS		
Project	**Client**	**Unique Features**
WRCRWA Facility Expansion	WRCRWA	14 MGD
City of Riverside WQCP Expansion	City of Riverside	$220 Million WWTP Expansion
Temecula WRF Expansion	EMWD	23 MGD
Calipatria Water Treatment Plant	GSWC	6.0 MGD

BOOSTER STATION PROJECTS			
Capacity (GPM)	Project	Client	Unique Features
1,000	Mead Valley Booster Station	EMWD	Demolition of Existing Site
6,000	Elsworth Temporary Booster Station	EMWD	Skid Mounted Package Pumping Facilities
1,000	Hidden Springs Booster Station	EMWD	Hydopnueumatic Facility Converted to Pump Storage
4,500	Craig Avenue Booster Plant	EMWD	Hydopnueumatic Facility Converted to Pump Storage
5,400	Mockingbird Booster Station	WMWD	Split Suction Header-Pumps From Two Sources
4,800	Arlington Desalter Booster Station	WMWD	
56,000	Holcomb Booster Station	WMWD	Natural Gas and Electric Pump Units
8,400	Oleander Booster Station	WMWD	Natural Gas and Electric Pump Units
21,900	Bergamont Booster Station	WMWD	Combined Potable & Non-Potable Station
1,200	Rolling Meadows Booster Station	WMWD	Constant Pressure Converted to Pump Storage
1,200	Lakehills 1550' PZ Booster Station	WMWD	Constant Pressure Converted to Pump Storage
1,100	Lakehills 1860' PZ Booster Station	WMWD	
4,500	56th Street Booster Station	JCSD	
750	Indian Hills Booster Station	JCSD	
2,000	Clay Street Booster Station	JCSD	
3,500	Silverwood High Service Booster Station	CLAWA	500 PSI Discharge Pressure
3,700	Crestline Booster Station	CLAWA	350 PSI Discharge Pressure
6,000	Calipatria Raw Water Booster Station	GSWC	Low Suction Head
4,000	Aten Road Booster Station	Imperial	VFD's
7,500	Imperial Treatment Plant High Booster Station	Imperial	VFD's, On-Site Treatment

POTABLE WATER RESERVOIR PROJECTS				
Material	Volume (MG)	Project	Client	Comments
Steel	6.0	Mira Loma	JCSD	
Steel	7.0	Markham Tank	WMWD	
Steel	10.0	La Sierra Tank	WMWD	
Steel	5.0 x 2	Crestline Tanks	CLAWA	
Concrete	13.0	Sunnyslope Tank	JCSD	Included Concrete VS Steel Evaluation
Concrete	3.2	Mittry Tank	LACSD	Tallest Pre-Stressed Concrete Tank in CA
Concrete	0.5	Arlington Desalter Reservoir	WMWD	Concrete Poured in Place
Concrete	2.0 (Total)	La Laguna Tanks	EVMWD	Series of Four Reservoirs
Steel	1.0 x 4	Calipatria Tanks	GSWC	

WATER WELLS		
Project	Client	Unique Features
Site Improvement for Wells 6,14, and 15	JCSD	
Well Drilling, Design, & Equipping of Wells 40,41,45,46,47,49, & 50	City of Ontario	2,500 GPM - 3,500 GPM/350-880 HP Electric Motors
Well Drilling, Design, and Equipping of Wells 27 & 28	JCSD	3,500 GPM & 4,000 GPM/800 HP Electric Motors and 1 Standby Diesel Generator, ASR
Wells 17 & 18 - IXP & Chlorination System	JCSD	5000 GPM
On-Site Chlorine Generators at 13 Existing Well Sites	City of Ontario	Conversion of 13 Water Well Sites from Gas to On-Site Chlorine Generation
Well Drilling, Design, and Equipping of Wells 22,23, & 25	JCSD	500 HP Motors

ALBERT A. WEBB ASSOCIATES

LD LAND DEVELOPMENT

WEBB has extensive experience in a broad range of residential, commercial, and industrial development projects. We have provided hundreds of clients with high quality service and expertise throughout Inland Southern California for all types of residential, commercial, and industrial projects ranging from traditional single family lots, condominiums, and apartments to shopping centers, business parks, office buildings, and "big box" warehouses. We have also been involved in the development of institutional projects, including schools and universities, as well as recreational, medical, municipal, and community facilities.

DUE DILIGENCE/FEASIBLITY

- Data Collection & Utility Research
- Right-of-Way/Constraints Mapping
- Environmental Review
- Conceptual Site Planning & Layout Studies
- Quantity & Cost Estimates
- Earthwork/Grading Analysis
- Client Representation with Local Agencies & Elected Officials

ENTITLEMENT & PLANNING

- CUP's, PIP's, & TUP's
- Site Plans, Development Plans, Plot Plans, etc.
- Tentative Parcel and Tract Maps
- Conceptual Landscape Plans
- Change of Zone and General Plan Amendments
- Specific Plans & Specific Plan Amendments
- Variance Applications
- Airport Land Use Commission Processing

PRELIMINARY ENGINEERING

- Site Plan Analysis & Layout Studies
- Conceptual Grading Design & Earthwork Analysis
- Drainage Calculations & Facility Sizing
- Stormwater Quality Analysis
- Water Quality Management Plans (WQMP)
- Drainage Reports
- Sanitary Sewer Sizing Analysis
- Domestic, Fire, and Irrigation Water Sizing

SURVEY MAPPING

- American Land Title Association Surveys
- Boundary Surveys
- Aerial and Field Topographic Mapping
- Orthorectified aerial photography
- Legal Descriptions & Plats
- Lot Line Adjustments & Parcel Mergers
- Records of Survey
- Final Maps & Parcel Maps

TECHNICAL STUDIES & ENVIRONMENTAL

- Initial Studies
- Mitigated Negative Declarations (MND)
- Environmental Impact Reports (EIR)
- Traffic Impact Analysis
- Acoustical Analysis (Noise)
- Air Quality Analysis
- Greenhouse Gas (GHG) Analysis
- Health Risk Assessments (HRA)

FINAL ENGINEERING

- Horizontal Control & Paving Plans
- Grading Plans
- Sewer, Water, & Storm Drain Plans
- Street Improvement Plans
- Signing & Striping & Traffic Signal Plans
- Traffic Control Plans
- NOI & SWPPP
- Encroachment Permit Processing

LAND DEVELOPMENT

Jason Ardery, PE, TE, CPESC, QSD
Vice President

As the Director of Land Development at Albert A. Webb Associates (WEBB), Jason Ardery leads a team of highly experienced and diversified project managers, engineers, designers, planners, landscape architects, and administrative staff in residential, commercial, and industrial development projects.

Jason's technical experience includes residential lot layout studies, site plan layouts, due diligence/feasibility studies, grading, drainage, storm water quality analysis and design, sanitary sewer analysis and design, domestic and fire water analysis and design, and intersection and street improvement design. Jason has managed and assisted clients with the preparation and design of a wide range of projects including the preparation of application documents, exhibits, plans, reports and analysis for entitlements, as well as construction drawings for their projects.

Danielle Logsdon, PE
Senior Engineer

Danielle Logsdon is a Senior Engineer at Albert A. Webb Associates (WEBB) in the Land Development Department and has design experience in grading, hydrology, drainage, water quality, street and utility design. With that experience and her management skills, Danielle now oversees several residential, commercial, and industrial projects as a Project Manager.

Danielle has worked on numerous projects throughout southern California and collaborated with numerous agencies. Those agencies include the County of Riverside, City of Riverside, City of Moreno Valley, City of Fontana, City of Perris, City of Ontario, City of Lake Elsinore, City of Eastvale, City of Menifee, City of Fontana, Southern California Edison, Caltrans, Riverside County Flood Control, Elsinore Valley Municipal Water District, Eastern Municipal Water District, Jurupa Community Services District, Coachella Valley Water District, and Rubidoux Community Services District.

DJ Arellano, PE
Senior Engineer

DJ Arellano, PE, is a Senior Engineer in Albert A. Webb Associates' (WEBB) Land Development Department. With a decade of experience in the field of Site Development, he has designed projects ranging from small office complexes to large industrial centers (logistic facilities), retail shopping centers, and medical care facilities. With site designs encompassing up to 1.5M square feet of building area, many fortune 500 companies have benefited from his work. He has instituted many innovative project techniques which have rendered previously economically marginal parcels into highly desirable land for development. He has also participated in master planned projects that encompass numerous sites and developers. DJ is an active member of NAIOP.

Sarah Kawolski, PE
Senior Engineer

Sarah Kowalski is an experienced engineer that has provided project management for private projects including coordination with architects, engineers, biological and environmental consultants, developers, and various public agencies from design through construction. Sarah is responsible for supervision, training, and work load management for engineers, designers, interns, and drafters. Sarah is a specialist with water quality, grading, and drainage. Her experience includes residential design ranging from single family traditional to high density, attached and detached homes, preparation of plans, details, and specifications for grading, street, traffic control, sewer, domestic water, recycled water, and storm drain improvements for commercial and residential developments. She also has knowledge with sewer collection systems, pump stations and force mains. Sarah has extensive experience with the design and construction detailing of drainage and water quality facilities including surface and underground detention and retention systems, infiltration systems, filtration systems, and underground storm drain pipe.

Jennifer Gillen, PE
Senior Engineer

Jennifer Gillen is an experienced engineer that has provided project management for both public and private projects including coordination amount architects, engineers, biological and environmental consultants, developers, and various public agencies from design through construction, She is responsible for supervision, training, and work load management for engineers, designers, interns, and drafters. Her experience includes the preparation of plans, details, and specifications for grading, street, traffic control, sewer, domestic water, recycled water, and storm drain improvements for education/ institutional, public, commercial, and residential developments. She also has knowledge and experience with sewer collection systems and lift stations as well as extensive experience with design and construction detailing of flood control facilities including surface and underground detention and retention systems, underground storm drain pipe, box culverts, channels, and hydraulic control and dissipation structures..

Robert A. "Bernie" Berndt
Project Manager

During his tenure at Albert A. Webb Associates (WEBB), Robert "Bernie" Berndt has been responsible for overseeing the development and design of a multitude of individual projects ranging from small office complexes to large industrial centers, retail shopping centers, and medical care facilities. He has been significantly involved in many innovative project techniques that have rendered previously ignored parcels to highly desirable land for development. He has also participated in master planned projects that encompass numerous sites and developers.

Amazon Distribution Center – Project Rio

Moreno Valley

LD | TT | LA | SE | PE

- 1,250,000 SF Logistics Center on 73 Acres
- Innovative Design to Allow for Center on 73 Acres
- Entitlement and Final Engineering Design
- Multiple Agency Processing, Review, and Approval of Project
- Coordination with West Coast/East Coast Architectural Firms
- Tentative Parcel Map to Consolidate Several Parcels into two Parcels

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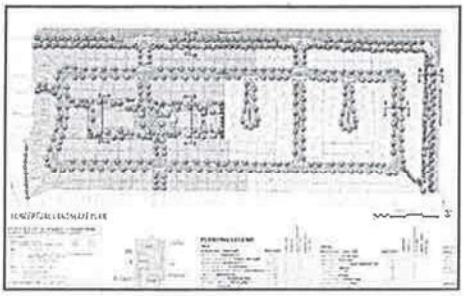

Harmony Trails – Tentative Tract 36695

Jurupa Valley

LD | TT | LA | PE

- 176 Single Family Residential Lots on 37± Acres
- Preliminary Grading Plan, Tentative Tract Map, and Change of Zone
- Conceptual Landscape Plan
- Master Planned Community Trail System

Goodman Commerce Center at Eastvale

Eastvale

LD | TT | LA | SE | PE | GIS

- Mixed Use Development: 2,040,000± SF Light Industrial, 147,200± SF Business Park, 490,000± Retail/Commercial on 193± Acres
- Tentative Parcel Map to Subdivide the Project into 10 Parcels
- General Plan Amendment & Specific Plan Engineering Support
- Preliminary Grading, Drainage, & Stormwater Quality
- Conceptual Landscaping Design

Physician's Hospital

Murrieta

LD | TT | EP | SE | PE | GIS

- 120,000± SF Medical Office Building on a 50± Acre, Full-Service Hospital Campus
- Due Diligence/Site Feasibility Services
- Conditional Use Permit and Development Plan with a Parcel Map
- Entitlement and Final Engineering Design
- Contract Administration and Construction Support

Europa Village Mixed-Use Resort

Temecula

LD | TT | SE | PE | LA

- 40-acre winery resort and spa
- Consists of bed and breakfast, fully functional winery, day spa, and multiple restaurants
- 53 future estate residential lots
- Responsible for all engineering required to improve the property
- Responsible for all major infrastructure to serve the property

Eastvale Medical Office Building
Eastvale

TT SE PE CMI LA

- 5+ Acre Site Consisting of Three Parcels
- Phase 1 of Development Consisted of 40,000 SF
- Phase 2 of Development Consisted of 30,000 SF
- Plot Plan and Lot Line Adjustment
- Final Engineering Service for On-Site Improvements Consisting of Grading, Drainage, Water Quality, Utilities, and Construction Support

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The Enclave Mixed-Use Development
Riverside County

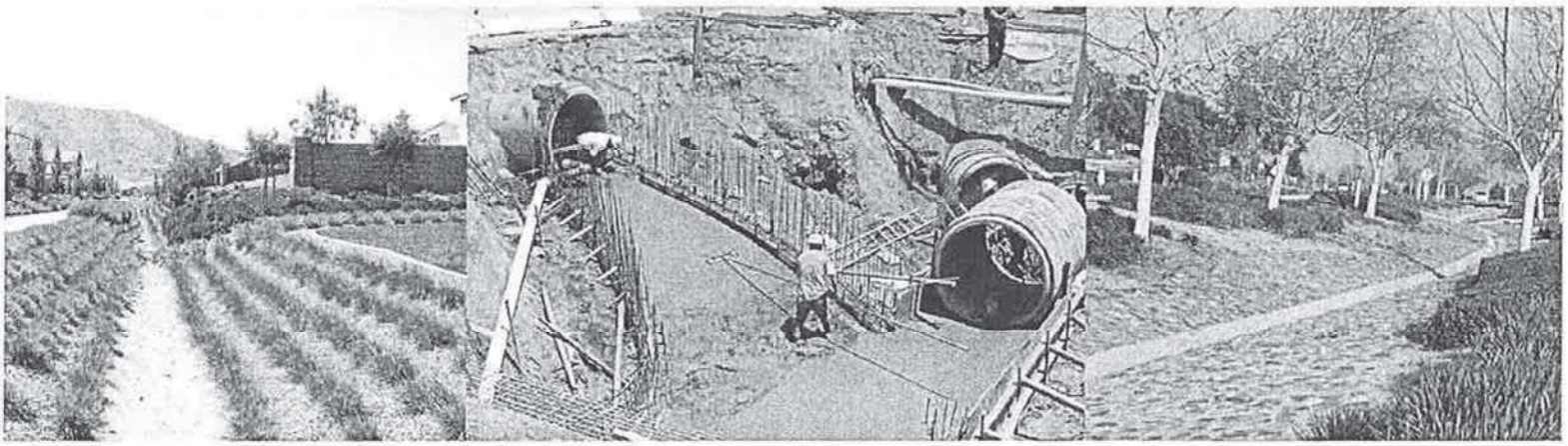
TT SE PE CMI LA

- Consists of 490 Residential Units
- 11 Acre Commercial Site
- Engineering Assistance in Preparation of Specific Plan Documents
- Final Engineering Services for the Tract Map and Plot Plan
- Traffic Signal Coordination
- Landscaped Streets and Medians

COMMERCIAL/INDUSTRIAL PROJECTS		
Project	Client	Location
WalMart Expansion EIR	Community Development Department	Riverside
WalMart Distribution Center	Pacific Newport Properties	Menifee
Cloverdale Marketplace	Koenig Companies	Eastvale
Motte Town Center	Mike Naggar and Associates	Perris
Winchester Ranch Marketplace	The Frost Company	Riverside County
Nexus Archibald Commercial Center	Nelson Development	Riverside Count
Eastvale Gateway South - Phase II	Lewis Retail Centers	Eastvale
March LifeCare Specific Plan Amendment	March Healthcare Development	Moreno Valley
Perris Valley Commerce Center	City of Perris	Perris
Ben Clark Training Center	Riverside County Sheriff's Department	Riverside

RESIDENTIAL PROJECTS		
Project	Client	Location
Grandmarc Student Housing Complex	Grandmarc	Riverside
The Villages of Lakeview Specific Plan and EIR	Lewis Operating Corporation	Lakeview
The Resort Mixed-Use Community	Lewis Operating Corporation	Riverside County
Homecoming Apartment Community	Lewis Operating Corporation	Riverside County
Serafina Condominium Community	William Lyon Homes	Riverside County
Mission Plaza Master Planned Development	Riverside County EDA	Riverside County
Mission Palms Senior Housing Apartment Complex	Palm Desert Development	Riverside County

ALBERT A.
WEBB
ASSOCIATES



SE STORMWATER ENGINEERING

Stormwater Engineering has become an increasingly important component in project development. Legislative bodies and regulatory agencies have implemented measures that now control virtually every facet of stormwater runoff management.

Traditional drainage solutions are becoming far less feasible as state and federal regulations continue to require even more environmentally-friendly facilities. Today a greater, more delicate balance is being demanded between what local agencies expect and what state and federal agencies mandate.

DRAINAGE INFRASTRUCTURE

- Regional & Sub-Regional Master Drainage Plans
- Area Drainage Plan Updates
- Stream Bank Revetment and Protection
- Landscaped Multi-Use Facilities
- Water Quality Management and Design

FLOODPLAIN MANAGEMENT

- Hydrologic Modeling
- Hydraulic Floodplain Analysis
- Floodplain Modification Design
- FEMA/CLOMR Updates
- FEMA/LOMR Updates

STORMWATER MANAGEMENT

- Water Quality Management Plan
- Stormwater Pollution Prevention Plan
- Best Management Practice Design

SE STORMWATER ENGINEERING

Joseph Caldwell, PE, CPESC, CPSWQ
Director

As an expert in hydrology and hydraulics, Joseph Caldwell leads Albert A. Webb Associates' (WEBB) Stormwater Engineering Department focusing on the development of master drainage plans, the design of backbone drainage infrastructure, and the design of water quality systems for flood control projects throughout the region. As a certified professional in erosion and sediment control and storm water quality, Joseph is a specialist in water quality and environmental compliance.

Joseph's experience includes the design of regional flood control basins, a flood control levee, master drainage plans, and the design and construction of several miles of backbone drainage infrastructure. He has also hydrologically and hydraulically modeled the San Jacinto River from Railroad Canyon to the existing Army Corps Levee in the City of San Jacinto.

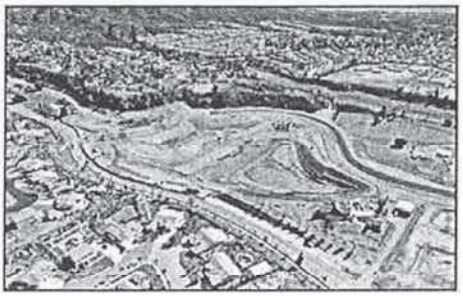
Entcho Anguelov, PE
Senior Engineer

Entcho Anguelov is a Senior Engineer in Albert A. Webb Associates' (WEBB) Stormwater Engineering Department. With his extensive design and modeling experience, Entcho is responsible for the project management, planning, and design of drainage projects. Entcho is also the firm's chief drainage mentor for the junior engineering staff. Entcho's design responsibilities include hydrology studies for commercial and residential projects, hydraulic design of storm drain systems and detention basins, floodplain analysis, and master drainage plans.

Entcho held the position of Research Engineer with the Bulgarian Academy of Sciences from 1989 to 1998 where he was responsible for the development of computer models in Finite Element Method and for analyzing the stress and strain state and stability of hydraulic and geotechnical structures, including analyzing the hydrodynamic filtration loading.

Eric Hays, PE
Senior Engineer

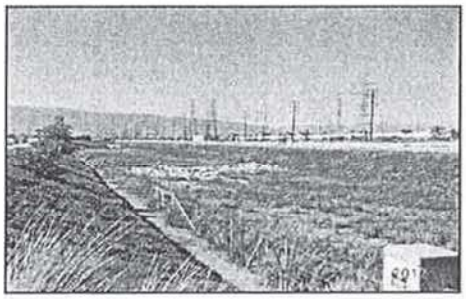
Eric Hays is a Senior Engineer at Albert A. Webb Associates' (WEBB) in our Stormwater Engineering Department with over 10 years of diverse engineering experience. Eric is an expert in hydrology, hydraulics, and drainage design. His experience includes the preparation of preliminary design reports, alternative analysis studies, and final design plans for flood control infrastructure projects. He also has experience in the design of storm drain systems for residential, commercial, industrial, and public agency projects. In addition to Eric's extensive drainage experience, he has a strong civil site development and public project background. His experience includes development of site grading plans, street improvement plans, sewer plans, bike trail plans, WQMP's , SWPPP's, and railroad grade crossing improvement plans. He also has field experience including survey, construction staking, construction observation, and support.



Wildwood Creek Basin
Yucaipa

SE | TT | LA | CMI | PE | GIS

- Flood Channel Design
- Right-of-Way Acquisition
- Multi-Jurisdictional
- Heavy Civil
- Public Outreach
- Utilities



Lower Etiwanda Creek
Ontario

SE | TT | LA

- Flood Channel Design (3,500 feet of natural channelization)
- Utility
- FEMA
- Heavy Civil
- Right-of-Way Acquisition

Eastern Coachella Valley Stormwater Master Plan
Coachella

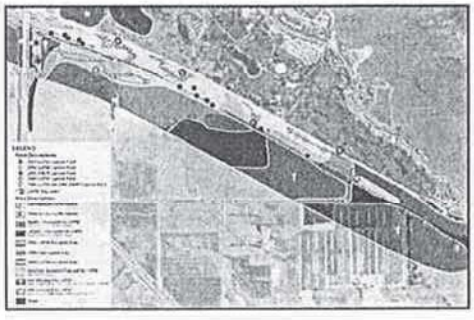
SE | TT | PE | GIS

- Facility Planning
- FEMA
- Utilities
- Public Outreach
- Multi-Jurisidictional

North Indio Channel
Coachella Valley

SE | TT | PE

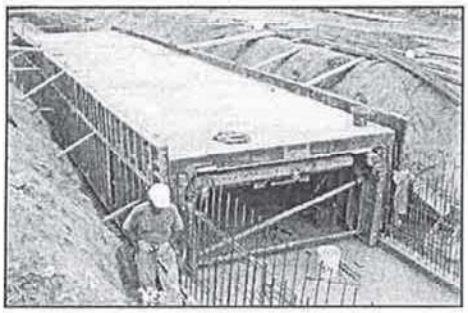
- 3 Miles of Concrete Lined Channels
- Culvert Crossings
- Preliminary Design
- Environmental Documentation
- Final Plans and Specifications
- CLOMR Preparation



San Jacinto River Levee Stage 4 Project
Riverside

SE | PE | LD | TT | GIS

- Flood Channel Design (Construction of a New Levee Five Miles in Length)
- Heavy Civil
- Multi-Jurisdictional
- Public Outreach
- R/W Acquisition & Utility
- Diversion Structure and Bridge Expansion to Expand Flow Capacity
- Floodwall
- Operation and Maintenance Plan



Wineville Ave. & Bellegrave Ave. Street & Storm Drain Improvements
Riverside County

SE TT

- Street Widening
- CEQA/IS/MND
- Master Plan Drainage Improvements
- Traffic Signal Improvements
- Installation of Approximately 6,000 LF of Master Plan Storm Drain
- 20 Acre Retention Basin with a Sports Complex

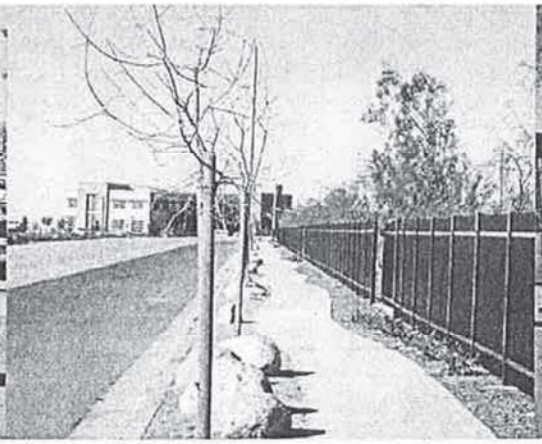
Etiwanda Ave., San Bernardino Ave., Valley Boulevard Street & Storm Drain Improvements
Ontario

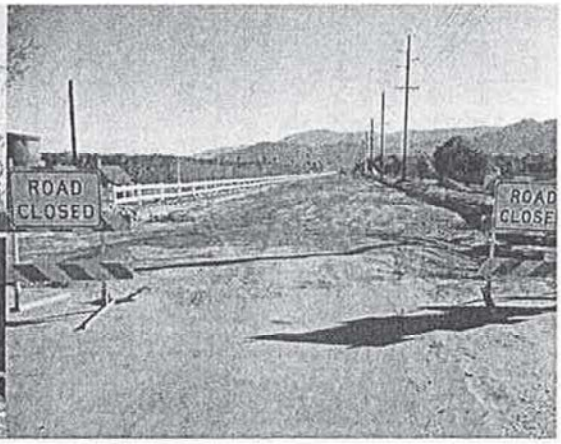
SE TT LA CMI

- Master Plan Drainage Improvements
- Roadway Widening
- Coordination with Other Agencies Flood Control
- CEQA/IS/MND
- Traffic Signal Improvements
- Regional Hydraulic Analysis of the Lower Etiwanda Watershed
- Reconstruction of 4.5FT X12FT RCB Storm Drain

STORMWATER ENGINEERING PROJECTS	
Project	**Client**
North Indio Channel	Coachella Valley Water District
Hemet Line C	Riverside County Flood Control & Water Conservation District
Palm Springs Line 43 - Lateral 43-A	Riverside County Flood Control & Water Conservation District
San Jacinto North Levee Repair	Riverside County Flood Control & Water Conservation District
SARI Line Protection	Riverside County Flood Control & Water Conservation District
University Wash Storm Drain	Riverside County Flood Control & Water Conservation District
On-Call Plan Check Services	Riverside County Flood Control & Water Conservation District
Alder & Casmalia Street & Storm Drain Improvements	County of San Bernardino - Solid Waste Management Division
College of the Desert Golf Academy Drainage Improvements	College of the Desert
Construction Management of MDP Lateral B-3 Stage 2 Storm Drain	First Industrial Reality - Trust, Inc.
PVSD/Perris Valley MDP Line	Sheffield Homes
Sunnymead Storm Drain	City of Moreno Valley
Wildomar Lateral C-1	City of Wildomar

ALBERT A. WEBB ASSOCIATES





TRAFFIC & TRANSPORTATION

For traffic projects, WEBB begins by conducting a field review of traffic signal, interconnect, signing and striping, and traffic control plans to check the accuracy of the project plans. We then incorporate the client's requirements into our internal plan checklist. WEBB reviews current guidelines and makes recommendations to the client engineering staff regarding policy implementation for traffic measures and devices to improve access and mobility in and around specific sites. Observation of traffic congestion, overflow parking, and speeding on residential streets is noted for future use in the final presentation of recommendations to the client staff.

TRAFFIC ENGINEERING

- Traffic Signals
- Traffic Signal Coordination
- Signal Warrant Analysis
- Signing and Striping Plans
- Intelligent Transportaiton Systems (ITS)
- Traffic Control Plans
- Highway Lighting

TRANSPORTATION PLANNING

- Traffic Impact Analysis
- Congestion Management
- Circulation Plans
- Corridor Studies
- Transportation Modeling
- Site Access and Circulation Analysis
- Traffic Calming Studies
- Infrastructure Planning
- Mixed-Use and Shared Parking Analysis
- Parking Facility Design
- Road and Bridge Benefit Districts
- Pedestrian/Bikeway Planning

HIGHWAY DESIGN

- Freeway Interchange Design
- Project Study Reports
- Project Reports
- Intersection Geometrics
- Drainage Design
- Construction Management

TT TRAFFIC & TRANSPORTATION

Dilesh Sheth, PE, TE
Vice President

Dilesh Sheth is Vice President of the Traffic and Transportation Department at Albert A. Webb Associates (WEBB). As an expert, Dilesh represents the firm with both public and private clients, presenting findings and recommendations to elected officials, municipal commissions, community groups, and the general public.

Dilesh's technical experience includes highway design, intersection and interchange improvements, street widening, alignment studies, and geometrics' drawings. He has managed and performed the traffic/transportation related technical portions of general plan circulation elements, redevelopment plans, specific plans, and environmental impact reports for public and private clients. Dilesh has extensive experience coordinating and processing permits through Caltrans for encroachment permit projects. He is also proficient in TRAFFIX and WEBSTER programs for intersection analyses, SYNCHRO Program, ROADPLAN Software for ICU and delay evaluations, and ULI spread sheets in shared parking analyses.

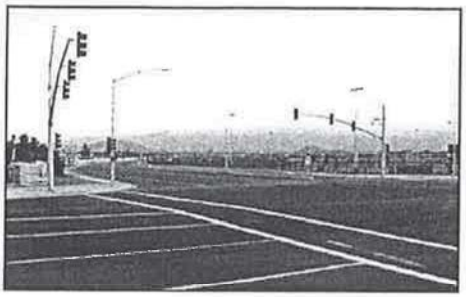
Myung Choo, PE, TE
Senior Engineer

Myung Choo is a Senior Engineer in Albert A. Webb Associates' (WEBB) Traffic and Transportation Department. As part of his responsibilities, he prepares traffic studies, designs new traffic signals, and upgrades existing traffic signals. Myung has extensive knowledge of governmental agency procedures, design, geometrics, signs, traffic controls, parking, and maintenance. He presents findings and recommendations to elected officials, municipal commissions, community groups, and the general public.

Myung has extensive experience in coordination and processing of permits through Caltrans for encroachment permit type projects. He is also proficient in TRAFFIX and WEBSTER programs for intersection analyses, SYNCHRO program, ROADPLAN software for ICU and delay evaluations, and ULI spread sheets in shared parking analyses and he has designed and analyzed micro-simulation computer traffic models.

Lin McCaffrey, PE
Senior Engineer

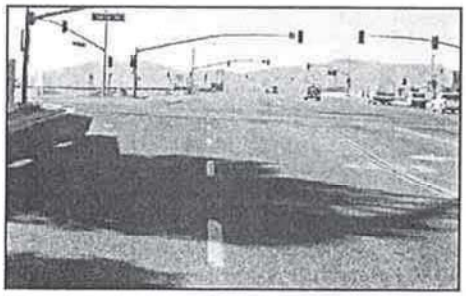
Lin McCaffrey is a Senior Engineer at Albert A Webb Associates (WEBB) and has over 25 years of diversified experience in the field of civil, transportation, water resource, and structural engineering. She has served as project manager/project engineer for a wide range of projects involving urban highway design and rehabilitations, railroad grade separation, master planned drainage facility design, water and wastewater facility design, hydrology and hydraulics studies, water quality facility design, and various residential and commercial developments. Construction management responsibilities include contract and budget administration, project schedules, staff training, overseeing design, and resolving various construction phase related drainage and water quality issues.



On-Call Traffic and Transportation Engineering
Riverside County

TT SE PE LPM CMI MS GIS

- Successfully Obtained Funding for Projects
- Provided Project Management of Large Interchange Projects
- Provided Staff Augmentation Services



On-Call Traffic and Transportation Engineering
Lake Elsinore

TT SE PE LPM CMI MS GIS

- Three Interchange Projects
- Staff Augmentation Services
- Mitigation Fees

On-Call Traffic Engineer for the City of Grand Terrace
Grand Terrace

TT SE PE LPM CMI MS GIS

- Caltrans Approval for Barton Road Interchange within One Month
- Traffic Calming
- Pedestrian and Bike Facilities

Madison Street Improvement Project from Avenue 50 to 52
Indio

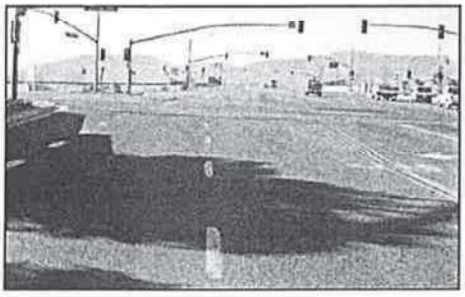
TT SE LSR CMI MS GIS

- Traffic Analysis
- Roundabout Analysis
- Aggressive Schedule for Phase 1
- Coordination with Two Agencies
- Completed within Budget and Schedule
- Hands-On Approach

Harrison & Avenue 66 Traffic Signal & Street Improvement Project
Riverside County

TT SE PE LSR

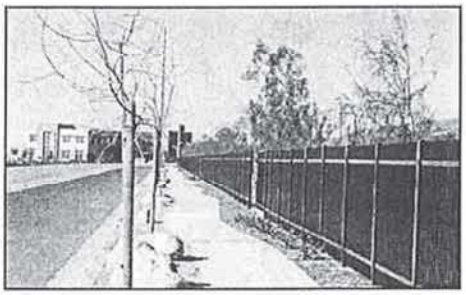
- Safety Improvements
- Coordination with Businesses
- Pavement Widening
- Reconfiguration of Access to Businesses



Varner Road/Monterey Avenue Street Improvements
Thousand Palms

TT SE PE CMI

- Environmental, Planning, Design, Utility Coordination
- Community Outreach and Coordination with Homeowners
- Sidewalk Installation on Varner Road and Monterey Avenue
- Grind and Overlay, Raised Median, and Crosswalk Installation
- Two Lanes to Four Lanes
- 2,400 FT Long Block Wall Along Monterey Avenue and 2,000 FT Concrete Barrier Wall Along I-10



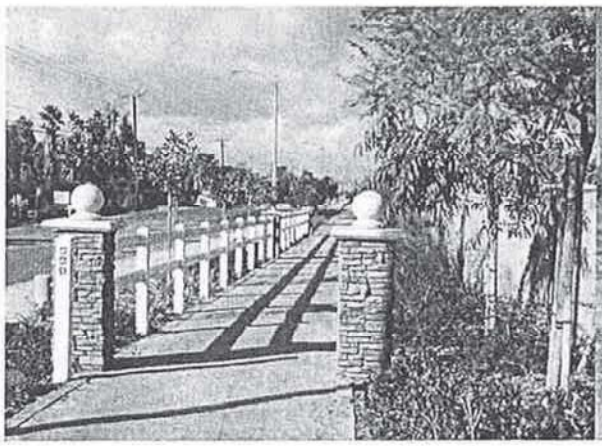
Alder Avenue and Casmalia Street Widening Project
Rialto

TT SE LA CMI GIS

- Construction Document Preparation
- Street, Sidewalk, and Drainage Improvements
- Roadway Widening
- Utility Relocation Coordination
- Traffic Signal Improvements
- Water Quality Management Plan

TRAFFIC & TRANSPORTATION PROJECTS		
Project	**Client**	**Location**
Etiwanda Avenue, San Bernardino Avenue, Valley Boulevard Street and Storm Drain Improvements	City of Ontario	Ontario
Wineville Avenue and Bellegrave Avenue Street and Storm Drain Improvement Project	County of Riverside EDA	Riverside County
Ayala Avenue Widening	City of Rialto	Rialto
Michigan Street and Master Storm Drain Improvement Project	City of Grand Terrace Public Works	Grand Terrace
Indian Avenue Street Widening and Drainage Infrastructure Improvements	City of Moreno Valley	Moreno Valley
Meadowlark Road Improvements	City of Murrieta Public Works	Murrieta
I-215/Scott Road Interchange Improvements	County or Riverside Transportation Dept.	RIverside County
Palm Springs MDP Line 43 and Lateral 43-A	Riverside County Flood Control	RIverside County
Indian Avenue Street Widening and Drainage Infrastructure Improvements	Riverside County Flood Control	Moreno Valley
Major Intersection Capacity Improvements	City of Rancho Mirage Public Works	Rancho Mirage
Washington Street Turn Lanes	City of La Quinta Public Works	La Quinta
Limonite Avenue Improvement Project	County of Riverside EDA	Riverside
Engineering and Traffic Survey for Roadway Segments	City of Rancho Mirage Public Works	Rancho Mirage
Bellegrave Avenue Street Improvements	County of Riverside EDA	Riverside

ALBERT A. WEBB ASSOCIATES



PE PLANNING & ENVIRONMENTAL

Our in-house team includes experts in air quality, water quality, planning, traffic, noise, biological resources, and agricultural resources. Interfacing with the firm's professional engineers, our Planning & Environmental Services Department understands the "big-picture" of a project's life as it moves from inception, to analysis, to implementation. Our master planning, survey and topographic mapping, preliminary design studies, and construction management resources allow our Planning & Environmental Services Department to provide other related services to assist the client in developing a complete project description and identify potential impacts to construction or operation of the proposed project in the proposal stage.

Our experience demonstrates we stay current with changing regulations and keep up-to-date on NEPA/CEQA case law. This information allows us to create a more defensible document to benefit public agencies as well as project applicants.

ENVIRONMENTAL SERVICES

- Categorical Exemptions/Exclusions (CE)
- Initial Studies/Environmental Assessments (IS/EA)
- Negative Declaration/Mitigated Negative Declaration/Findings of No Significant Impact (ND/MND/FONSI)
- Environmental Impact Reports (EIR)
- Environmental Impact Statements (EIS)
- Project Scoping
- Identification of Relevant Issues
- Preparation & Processing of Required Documents
- Applications & Permits
- Development of Effective & Cost-Efficient Mitigation Measures
- Preparation of Public Notices & Staff Reports
- Public Coordination
- Preparation of Mitigation Monitoring & Reporting Plans
- Attendance at Public Hearings

PE PLANNING & ENVIRONMENTAL

Stephanie Standerfer
Vice President

Stephanie Standerfer is the Vice President over Planning and Environmental Services for Albert A. Webb Associates (WEBB). Stephanie has over 17 years' professional experience as an environmental planner, specializing in managing large California Environmental Quality Act (CEQA) projects for both public and private projects. Stephanie has managed large project and program environmental impact reports (EIRs) for water districts, cities, and private developers. Her breadth of project experience allows her to foresee and navigate challenges that inevitably arise during CEQA compliance. She is an expert in CEQA implementation in the Inland Empire, and she provides training in CEQA processing to local agencies.

Stephanie served as extension of staff to the Western Riverside County Regional Conservation Authority (RCA), the entity responsible for implementation of the Multiple Species Habitat Conservation Plan (MSHCP) for over eight years. As contract staff to the RCA, Stephanie provided ongoing processing, review, and consultation on implementation procedures and policies. Stephanie provided training and policy guidance documents to not only the RCA but all Permittees, which includes all 17 cities in western Riverside County as well as the County of Riverside itself. Stephanie's experience with the RCA has given her a strong understanding of the various resource regulatory agencies and how to anticipate issues before they arise.

Stephanie's interdisciplinary background is reflected by her experience managing the production of general plan updates, specific plans, planning studies, environmental constraints analyses, air quality impact studies, health risk assessments, noise studies, biological resource surveys, and cultural resource studies. As the project manager on a variety of controversial public works and private development projects over the years, she has managed teams of subconsultants, engineers, and architects, and she enjoys the interaction and coordination involved in these types of projects.

Stephanie's reputation as a CEQA authority has also led to her peer reviewing CEQA documents, including EIRs. She develops excellent working relationships with her clients to assist them in navigating the intricacies of environmental regulatory compliance.

Cheryl DeGano
Principal Environmental Analyst

Cheryl DeGano serves as a Principal Environmental Analyst at Albert A. Webb Associates (WEBB) and manages the preparation and approval of environmental and planning documents for public and private sector clients. During her 25 year consulting career, Cheryl has been responsible for the preparation and processing of environmental and planning documents including environmental impact reports, environmental assessments, initial studies and mitigated negative declarations, mitigation monitoring and reporting programs (MMRPs), specific plans, development impact fee ("Nexus") studies per California Government Code 66000 et seq., and development and entitlement applications.

Cheryl has been responsible for all aspects of these projects including research, data collection and analysis, report writing, quality assurance/quality control review, preparation of distribution lists, direction of public noticing, project management, representation at public meetings and hearings, and agency and client coordination.

Eliza Laws
Senior Environmental Analyst

Eliza Laws is a Senior Environmental Analyst at Albert A. Webb Associates (WEBB) and specializes in preparing air quality impact analyses including Greenhouse Gas (GHG) emissions and mobile source health risk assessments. She has been responsible for the preparation and management of environmental documents including environmental impact reports (EIRs), Initial Studies (ISs), Mitigated Negative Declarations (MNDs), and Mitigation Monitoring and Reporting Programs (MMRPs). Eliza has been responsible for all aspects of these documents including research, data collection and analysis, report writing, quality assurance/quality control review, preparation of distribution lists, direction of public noticing, project management, and agency and client coordination.

Melissa Perez
Senior Environmental Planner

Melissa Perez is a Senior Environmental Planner with the Planning & Environmental Services Department and has been with Albert A. Webb Associates (WEBB) since 2004. Melissa's experience in land use planning lies in preparing and processing entitlement projects ranging from lot line adjustments to development plans, due diligence, as well as managing and authoring planning and environmental documents. Her familiarity in working with local, regional, and state agencies to develop regional plans, specific plans, environmental impact reports, and other regulatory documents is supported by her concentrated knowledge of public organizations and public policy.

Melissa has authored and managed the preparation of design guidelines, Specific Plans, Specific Plan Amendments, and their accompanying zoning ordinances. She is also responsible for the preparation and management of the various levels of CEQA and NEPA documents. With her knowledge and experience in both the entitlement and environmental compliance phases for commercial, industrial, residential, economic development, public works, healthcare, and mixed-use projects, Melissa's expertise lies in processing projects in various jurisdictions from inception through approval.

Sandra Chandler, AICP
Entitlement Manager

Sandra Chandler oversees planning and entitlement services for the land development market at Albert A. Webb Associates (WEBB). She has managed the preparation and processing of over 200 commercial, industrial, and residential projects, spanning more than 10 municipalities throughout California. The magnitude of these projects range from a lot line adjustment to a large Specific Plan/EIR.

Sandy's attention to detail and ability to multi-task help her to simultaneously manage numerous projects in various jurisdictions from project inception through the entitlement/CEQA process, and in some instances through construction. Sandy manages all facets of each project and coordinates with WEBB's support departments such as mapping, survey, environmental, and traffic, as well as the overall project team which typically consists of the client/developer, project architect, landscape architect, and special study consultants.

The Villages of Lakeview Specific Plan and EIR
Lakeview

PE TT EP CMI SE LD GIS

- Preparation of Specific Plan and EIR
- CEQA Compliance for the Villages of Lakeview
- 2,800 Acres, Maximum 11,150 Dwelling Units (40 Units per Acre)
- Master Plans for Grading, Transportation, Water, Wastewater, Recycled Water, Stormwater
- Boundary Survey, Record Map, Topographic Survey, and Encumbrance Plotting

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Tequesquite Landfill Photovoltaic System
Riverside County

PE GIS

- CEQA Compliance
- Construction and Operation of a 10 Megawatt (MW) Photovoltaic (PV) System
- Air Quality Modeling
- Visual Impact Assessment
- Western Riverside Multiple Species Habitat Conservation Plan (MSHCP) Compliance

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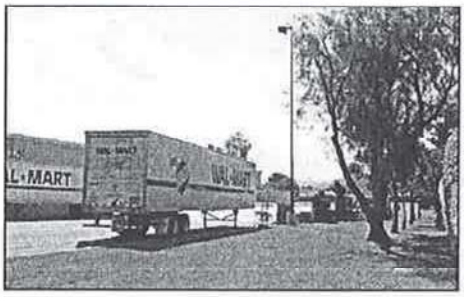
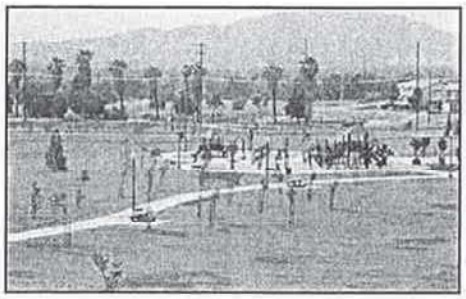


Walmart Expansion Project EIR
Riverside

PE LA GIS

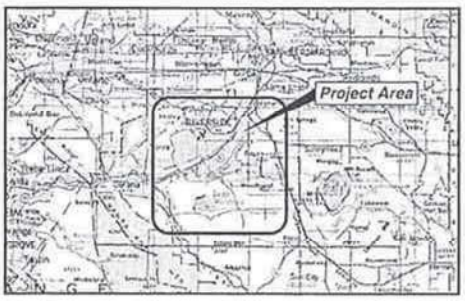
- Commercial Expansion of an Existing Walmart Store (22,272 SF Expansion)
- CEQA Compliance
- IS and EIR
- Impact Analysis: Air Quality, Greenhouse Gas Emissions, and Noise Study
- Eir Unanimously Approved and Certified (Riverside City Council, January 2012)



Ryan Bonaminio Park at the Tequesquite Arroyo
Riverside

PE TT LA

- EIR for the City of Riverside Proposed Development of a Public Park
- 40 Acres of City Property East of Santa Ana River and South of Mount Rubidoux
- Two Baseball Diamonds, Concession Stand, Open Turf Grass and Play Equipment Entry Plaza, Parking Lot (350 Cars), Two Basketball Courts, and Park Trails
- Restoration of Wetland (Permitting, Preparation of Air Quality/Greenhouse Gas Analysis)



City of Riverside General Plan Update Recirculated EIR
Riverside

PE GIS

- Revisions and Recirculation of General Plan (GP) Draft EIR
- Updates to Air Quality, Noise, Land Use, Utilities, Traffic, and Alternatives
- Global Climate Section Added to the Air Quality Analysis
- Development of Legally Defensible EIR
- Streamlined Process to Future GP Updates

BP Fuel Logistics Center EIR
Palm Springs

PE CMI

- EIR for Fuel Distribution Center
- Fuel Pipeline Extension to On-Site Storage Tanks
- Pumps and Piping to Supply Three-Lane Truck Loading Rack
- 16-in Pipeline Approximately 5,000 Feet Long
- Multi-Agency Coordination
- Preparation of Hydrology Report, WQMP, Traffic Analysis Report, and Air Quality Impact Analysis

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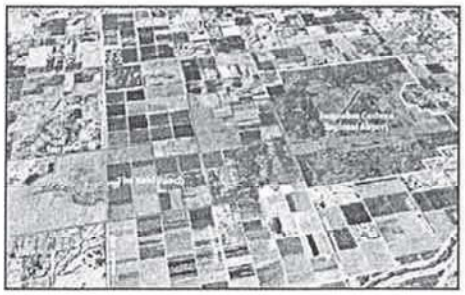
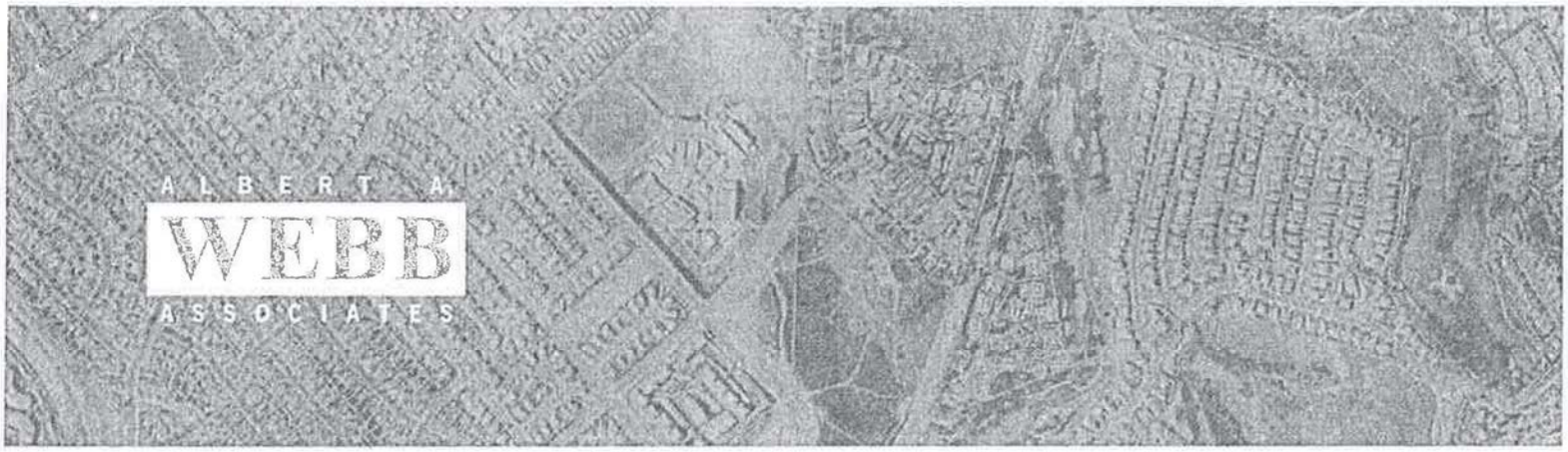


Kohl Ranch Engineering Services No. 303, Amendments 1 & 2
Riverside County

PE

- Preparation of Specific Plan (SP 303) Amendment Nos. 1 and 2
- Amendment Reflected the Acquisition of Over 80 Acres of the Project Site by CVUSD
- Alterations to Planning Areas, Boundaries, and Land Use Designations
- Water and Sewer Sections were Updated to Reflect the Provision of a Dual Water System
- Multi-Agency Coordination
- IS, Traffic, Acoustical, Air Quality, and GHG Technical Analysis

PLANNING & ENVIRONMENTAL PROJECTS		
Project	**Client**	**Location**
Thoroughbred Farms Specific Plan and EIR	Industrial Design International	Mira Loma
Public Library Demolition EIR	City of Riverside Planning Division	Riverside
Imperial Hardware EIR	City of Riverside Planning Division	Riverside
Parkside, Subarea 29, and Esperanza Specific Plan EIRs	City of Ontario Planning Department	Ontario
Ontario Downtown Civic Center Project EIR	City of Ontario Planning Department	Ontario
I-15 Corridor Specific Plan	McCune & Associates	Riverside County
The Resort EIR	Lewis Operating Corporation	Eastvale
Rolling Hills Ranch EIR Addendum	City of Beaumont	Beaumont
City of Calexico General Plan Update and EIR	City of Calexico	Calexico
Clinton Keith Road Ramp Modifications	Caltrans	Riverside County
Keystone Regional Water Reclamation Facility	County of Imperial Planning Department	Imperial County
Stratford Ranch Specific Plan and EIR	Entrepreneurial-Sheffield Associates	Perris
Clearwater Solar Panel	City of Corona Water & Power	Corona
City of San Jacinto MDP EIR	City of San Jacinto	San Jacinto
Perris Center Commerce Center	City of Perris	Perris
Riverside-Corona Feeder Project EIR	Western Municipal Water District	Riverside County
Eastvale Master Plan Water & Sewer Lines	Jurupa Community Services District	Riverside County
Edgemont Water Master Plan Update	City of Moreno Valley	Moreno Valley
Rados Distribution Center EIR	Rados Companies	Perris
New Model Colony Infrastructure Master Plan	City of Murrieta Public Works	Murrieta
Mead Valley Booster Station No. 2	Eastern Municipal Water District	Riverside County



MF MUNICIPAL FINANCE

WEBB is a forward-looking firm that encourages every associate to look outside-the-box for progressive solutions. We enthusiastically approach pioneering solutions for our clients, whether creating new parcel categories when writing RMAs, or solving clients' challenges regarding water pond failures with an innovative answer to the problem. Our GIS capabilities are invaluable in identifying all parcels within each district thus greatly aiding in the administration of each district. We are experts in the area of California Code and with a collaborative effort, we are able to provide progressive solutions that are in concert with all laws and regulations within the industry.

FORMATION / BOND SALES

- Special Tax Consulting
- Assessment Engineering
- Prepare & Record Boundary Maps & Assessment Diagrams
- Rate and Method Preparation
- Cost Estimates
- Assessment Spread & Tax Allocation
- Engineer's Reports
- Prepare & Record Notice of Assessment/Special Tax Lien
- Official Statement Preparation Assistance
- Reassessment District Reports
- Notices of Public Hearings
- Proposition 218 Compliance
- Ballot Preparation, Mailing, & Tabulation
- Debt Service Reports Amortization Schedules
- Bond Payoff Schedules
- Debt Limit Reports Under the 1931 Act
- Official Statement Table Preparations
- Overlapping Debt Tables
- Value-to-Lien Computations

ADMINISTRATION

- Annual Levy Preparation
- Attend City Council/Board Meetings
- Budget Analysis
- Monitor Fund Balances
- Delinquency Monitoring & Management
- Initiation of Foreclosure Process
- Bond Call Analysis & Preparation
- Annual Engineer's Report
- Prepare & Disseminate Annual Disclosure Report
- CDIAC Reporting Compliance
- Annexations
- Parcel Apportionment
- Bond Payoff Calculations
- Special Tax Prepayment Calculations
- Close-Out Analysis at District Maturity
- Identification & Evaluation of Financing Alternatives
- Refunding Analysis
- Public Information Services

MUNICIPAL FINANCE

Heidi Schoeppe
Director

Heidi Schoeppe serves as Senior Finance Manager for our Municipal Finance Department, providing district administration and consulting services to municipalities throughout California for their special financing districts. She has developed expertise pertaining to various types of Special Districts, including the 1972 Act Landscaping and Lighting Maintenance Districts, 1915 Act Assessment Districts, Community Facilities Districts, and 1982 Benefit Assessment Districts. She has provided full formation, administration, district auditing, infrastructure financing and refinancing, constituent relations, and consulting services including Proposition 218 for hundreds of Special Districts within 11 California counties.

With her team, Heidi works as an extension of staff by providing seamless program management services for municipalities with numerous Special Districts. As a Project Manager, Heidi has been the lead on many formation projects, debt issuances, complex bond refinancing's, special projects, and various consulting services for many public agencies.

Doris Domen
Senior Financial Analyst

As Senior Financial Analyst at Albert A. Webb Associates (WEBB), Doris Domen has deep experience assisting with administration, formation, and consulting and financing services for special districts serving municipalities across the Inland Empire. Doris has spent more than 14 years handling ongoing administration duties for several special financing districts serving property owners within the Jurupa Community Services District (JCSD). She provides a wide range of services for JCSD's 1972 Act Landscaping and Lighting Maintenance Districts (LMDs) and Community Facilities Districts (CFDs), including helping prepare assessment district apportionments, updating assessor's maps, and recalculating special taxes on subdivided properties.

Among her major projects, Doris in 2015 played a major role in helping the JCSD successfully refinance tens of millions of dollars in special tax bonds for numerous CFDs, resulting in a substantial savings for property owners through tax reductions. Her extensive financing work also includes assisting in the Marks-Roos refunding of CFDs for the City of Riverside, which include multiple bond series districts, and assisting in the issuance of bonds for Riverside.

Charmaine McCarvel
Finance Manager

Charmaine McCarvel, an Associate Financial Analyst at Albert A. Webb Associates (WEBB), assists municipalities with administration, formation, financing and consulting services for their special districts. Her efforts help ensure that the districts continue to receive appropriate tax funding to provide much-needed community services and infrastructure.

Charmaine offers deep expertise in 1972 Act Landscaping and Lighting Maintenance Districts (LMDs), 1915 Act Assessment Districts (ADs), Community Facilities Districts (CFDs), Community Services Districts and 1982 Act Benefit Assessment Districts. She has provided a full range of services, including Proposition 218 compliance, for nearly 40 special districts benefiting municipalities within two Southern California counties. Charmaine currently serves as Project Manager for the City of Chino, several other cities and two water districts.

Formation, Administration, and Annexation Services
Desert Hot Springs

- Formed One Bonded CFD and One Maintenance CFD for the City
- Refunded One CFD for the City
- Enrolled 32,800 Charges/$4.8 Million Fiscal Year 2010-11 Secured Tax Roll for the City
- Formation Services
- Parcel Audit and Administration Services

Formation and Administration Services
Riverside County Flood Control & Water Conservation District

- Formation and Administration Services for the Last Six Years
- Administration Services for the National Pollution Discharge Elimination System (NPDES)
- Conducted Parcel Audit and Analysis for NPDES
- District had a 7.38% Increase as a Result of the Parcel Audit

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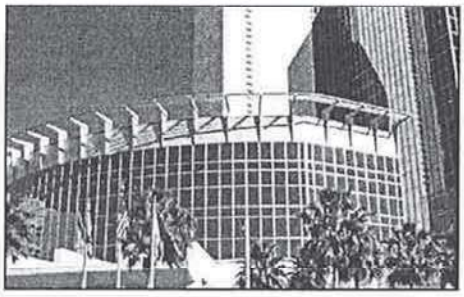

Formation, Annexation, and Administration Services for Special Districts
Riverside County Executive Office

- Provided Formation and Administration Services to the County of Riverside for the Past 28 Years
- Formed Four Bonded CFDs for the County with Six Bonded CFDs
- Refunded Five CFDs and One Ad for the County
- Prepared 14 CFD Reports for the County, Total Parcel Count 22,642
- Projections of Tax Revenues to Ensure Sufficient Funds will be Generated to Meet Debt Service

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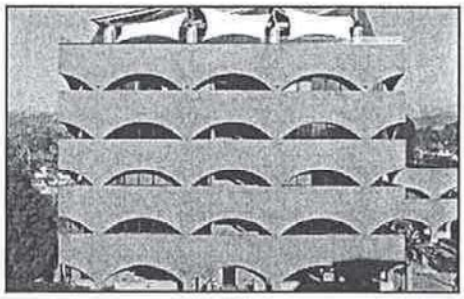

Formation, Annexation, and Administration Services
Riverside

- Formation, Annexation, and Administration Services for the Past 15 Years
- Formation of Several CFDs
- 1913/1915 Act Assessment Districts (AD)
- 1972 Act Landscape and Lighting Maintenance Districts (LLMD)
- Preparation of Rate and Method of Apportionment (RMA) of Special Tax

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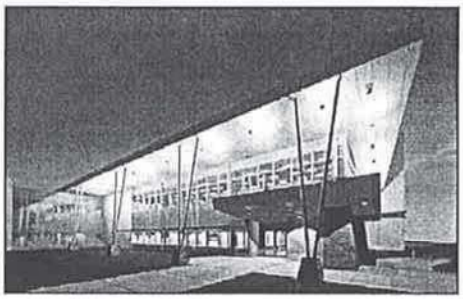


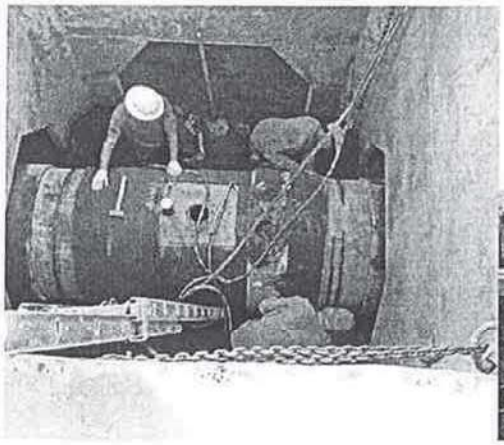
Formation, Administration, and Parcel Audit Services
Eastern Municipal Water District, Riverside County

- Levy and Parcel Audit Services on Each Newly Assumed District
- Parcle Audits Resulted in the Discovery of a Total of $121,069.38 in Special Taxes
- CFD Formation Work Includes Coordination of the Cost of Facilities
- Tax Revenue Projections
- Preparation of Rate and Method of Apportionment (RMA) of Special Tax
- Preparation and Record of the Notice of Special Tax Lien

FORMATION PROJECTS				
Agency	WEBB Formed AD's	WEBB Formed CFDs	WEBB Bond Sales/Refundings	Years of Service
County of Riverside	7	10	15	27
Jurupa CSD	8	45	40	27
Riverside County	3	1		27
Edgemont CSD	2			39
Eastern Municipal WD	1	60	53	19
Western Municipal WD	3		1	21
Mission Springs WD	3		3	6
City of Riverside	7	4	11	18
City of Corona	3	19		18
City of Ontario	5	1	4	29
City of Desert Hot Springs		3	2	8
City of Wildomar		1		2
City of Lake Elsinore		1	1	2
City of Menifee		2		2
City of Redlands		2		8
City of Chino		1	2	11

ADMINISTRATION			
Agency	No. of Districts	Parcels	Enrollment
County of Riverside	9	5,604	$7,101,621.42
Jurupa CSD	55	51,712	$32,804,947.90
Riverside County Flood Control	4	527,455	$3,577,951.46
Edgemont CSD	2	1,051	$260,829.64
Eastern Municipal WD	36	8,468	$8,851,661.24
Western Municipal WD	6	10,839	$1,413,135.44
Mission Springs WD	1	428	$548,084.52
City of Riverside	13	147,590	$5,203,957.24
City of Corona	9	59,034	$9,159,180.48
City of Ontario	2	206	$1,151,917.46
City of Desert Hot Springs	10	38,035	$5,643,813.92
City of Wildomar	7	20,333	$913,321.60
City of Lake Elsinore	37	47,424	$24,355,151.00
City of Menifee	11	35,560	$3,197,598.00
City of Temecula	12	105,828	$21,035,148.94
City of Chino	24	19,570	$21,330,503.15
City of Redlands	1	141	$131,341.40
City of Tustin	1	7	$1,968,674.00
City of Santee	5	31,552	$1,696,399.76
Totals	**245**	**1,110,837**	**$150,345,238.57**

ALBERT A. WEBB ASSOCIATES



CMI CONSTRUCTION MANAGEMENT & INSPECTION

WEBB's philosophy of principal involvement in construction management ensures that each project is managed by a seasoned professional who is then further supported by a dedicated team of highly qualified staff. Our team approach can identify and mitigate potential issues before they occur.

WEBB's skilled field inspectors interface with the firm's professional office staff and the client's representatives, with all parties working collaboratively as a team to deliver high quality, cost effective project construction.

CONSTRUCTION MANAGEMENT & INSPECTION

- Construction Management
- Construction Contract Administration
- Design Constructability Review and Plan Checking
- Program Management
- Public Financing Reimbursement Documentation Preparation/Auditing
- Coordination with Government and Regulatory Agencies
- Construction Scheduling
- Construction Surveying
- Construction Inspection
- Resident Engineer Services
- Bid Document Review
- Value Engineering
- Cost Estimating
- Permitting Assistance
- Operation & Maintenance Support
- Closeout Services

FACILITIES CONSTRUCTION MANAGEMENT & INSPECTION

- State Highways, Roads, Traffic Signals, & Bridges
- Storm Drains
- Flood Control Channels
- Detention/Retention Basins
- Sanitary Sewer Collection and Interceptor Pipelines
- Wastewater Treatment Plants and Lift Stations
- Water Distribution and Transmission Pipelines
- Reservoirs
- Wells
- Booster Stations
- Water Treatment Facilities
- Recycled/Reclaimed Water Systems
- Parks and Streetscapes
- Dry Utilities

CFD Oversight

- CFD Funding & Acquisition Agreement
- Construction Admin. & Management
- Inspection
- Facilities Engineer

CMI CONSTRUCTION MANAGEMENT & INSPECTION

Wallace Franz, PE
Vice President

Wallace "Wally" Franz, Vice President and Market Leader for Albert A. Webb Associates (WEBB), has 40 years of diverse experience within the civil engineering field. He began his career as a structural engineer with a large international design and construction company, then performed land development engineering for a small Inland Southern California firm, and has spent the last 35 years working with WEBB as a project engineer, inspector, project manager, and principal-in-charge of projects primarily focusing on water resources and construction management and inspection.

Wally's attributes include "hands-on" involvement with projects under his purview, excellent personal relationship skills, a low key approach to problem solving, and listening to client input and feedback to develop practical solutions to concerns and questions that may arise during the course of a project.

Reed Chilton, PE
Associate Engineer

Reed is an Associate Engineer in Albert A. Webb Associates' (WEBB) Construction Management and Inspection Department. Reed has worked on a variety of projects and has established a strong foundation in the engineering and construction management profession. Reed recently became a professionally licensed Civil Engineer in the State of California and is also a Qualified SWPPP Practitioner and Developer. He is currently a primary contact for the engineering team during the construction of the Western Riverside County Regional Wastewater Authority's $55 Million (14 MGD) Plant Expansion Project in Eastvale. He is also a Construction Manager on the $150 Million Chino Preserve CFD Backbone Infrastructure Project and a $2 Million Street Improvement Project in the City of Perris.

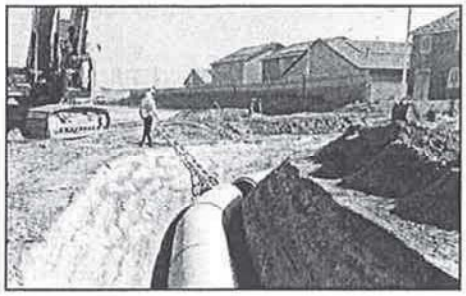
Phillip J. Lemoine, CET
Construction Manager/Inspector

Phil Lemoine serves as Construction Manager/Inspector with Albert A. Webb Associates' (WEBB) Construction Management & Inspection department. He was instrumental in providing construction management and inspection for improvements of Assessment Districts 159 and 161 and CFD 88-4 for the County of Riverside in the Murrieta/Temecula area. His responsibilities included the on-site inspection and construction management on five bridges in Assessment Districts 159, 161, and CFD 88-4 for the County of Riverside. He also provided construction management services for the widening of the Rancho California Road bridge crossing over the I-15 for the City of Temecula.

2013 Sewer Main Replacement Project
Moreno Valley

CMI

- Inspecting Sewer Main Lines, Sewer Service Laterals, Installation of Concrete Manholes, Video, and Testing New Pipeline
- Abandoning Old Sewer and Manholes
- Assuring Contractor is Complying with Contract Plans and Specifications
- Coordination with Public and City Officials



Day Creek Master Drainage Plan
Riverside

CMI SE LD

- Inspected 2,500 FT and 48-in in (RCP) Reinforced Concrete Pipe Installed, Associated Manhole Structural

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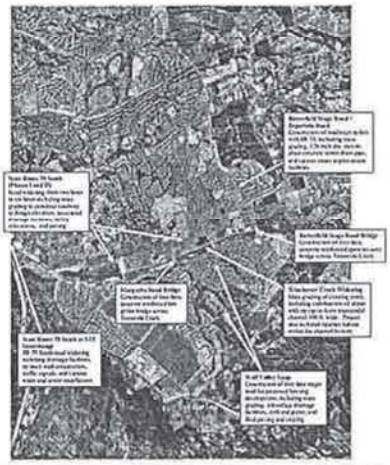
Community Facilities District 2003-3
Chino

CMI TT SE PE GIS

- Street Improvements
- Sewer Improvements
- Storm Drain Facilities
- Streetscape
- Dry Utilities
- Water and Reclaimed Water Improvements
- Water Supply Well
- Fire Station
- Traffic Signals
- Park

Exhibit 3.1: Riverside County Assessment District 159

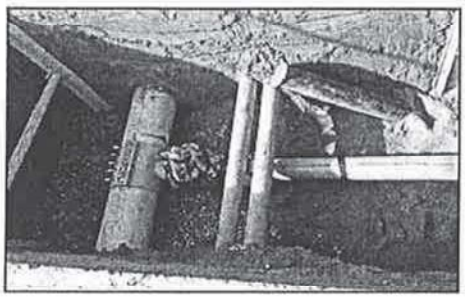


Assessment District Nos. 159 & 161 & CFD No. 88-4
Riverside County (Murrieta/Temecula Area)

(Largest CFDs in Southern California)

CMI SE GIS

- Construction Management Inspection
- Assessment Engineering
- Change Orders
- Progress Estimates
- Labor Compliance (as requested)
- Multi-Agency Coordination
- Caltrans
- $206M Improvements to the Districts



Perris Boulevard - Markham Street/Harley Knox

Perris

CMI TT SE

- 5,200 LF of Roadway Widening
- 16,000 LF of Sidewalk Construction
- Relocating 10 Traffic Signals
- Installing 4,000 LF of RCP Storm Drain
- Coordination of Underground Electrical Lines

Clay Street Grade Separation

Riverside

CMI SE

- 3,000 LF of 18-in PVC Sewer Forcemain
- 1,100 LF of 10-in PVC Sewer Forcemain
- 3,800 LF of 12-in CML/CMC Waterline and Appurtenances
- Construction of Sewer Lift Station

Fern Valley Road Waterline Replacement

Riverside County

CMI TT

- Installation of 3,350 LF of 12-in Diameter Waterline
- Installation of 870 LF of 6-in Diameter Waterline with Appurtenances Along Fern Valley Road, Howland Road, and Encino Road
- Contractor Coordination for Conformance with Specifications and Interpretation of Contract Documents

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Walnut Grove Avenue Sewer Repair

Eastvale

CMI

- Video Inspection of 12-in Diameter VCP & DIP Sewer Main with 24-in Diameter Steel Casing
- Final Engineering Plans, Specifications for Replacement, and Bidding Assistance
- Construction Management and Inspection of the New 175 LF, 12-in Diameter VCP Replacement Gravity Sewer Main
- Traffic Control Coordination with the City of Eastvale

Limonite Avenue Improvement Project

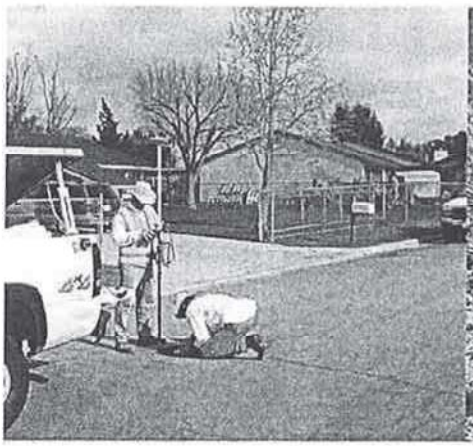
Riverside County

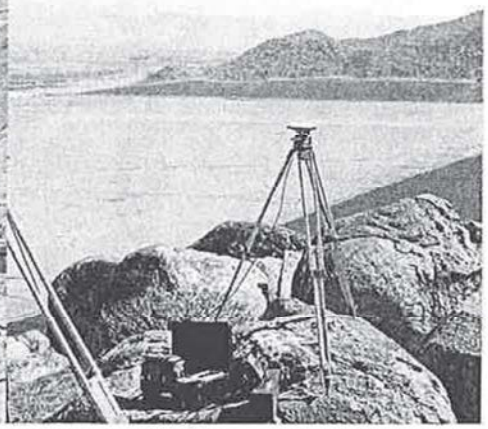
CMI TT LA SE GIS

- 22,000 LF Beautification Project: Drainage, Landscape, and Street Improvements
- 16,000 LF of Landscape/Cobble-Lined Median Swale with Underground Stormdrain Connections
- Extensive Community Outreach
- Formation of Lighting and Landscape Assessment District

Construction Management and/or Inspection Projects									
Construction Client/Project Name	Construction Cost	Roadway Improvement	Flood Control/Storm Drain	Traffic Signals	Sewer Facilities	Parks/Landscaping	Sitescapes	Bridges	Water Facilities
City of Fontana CFD No. 2 Village of Heritage	$125,000,000	✓	✓	✓	✓	✓	✓	✓	✓
City of Fontana Southridge Village Phase III	$50,000,000	✓	✓	✓	✓	✓	✓	✓	✓
City of Fontana Hunter Ridge Phase I	$15,000,000	✓	✓	✓	✓	✓	✓		✓
City of Temecula Rancho California Road Interstate 15 Bridge Widening	$ 4,800,000	✓	✓	✓	✓		✓	✓	✓
City of Lake Elsinore Collier Avenue Improvements	$4,400,000	✓	✓						
Riverside County Transportation Dept. CFD 88-4	$20,000,000	✓	✓	✓	✓	✓	✓	✓	✓
Riverside County Transportation Dept. AD 159	$105,000,000	✓	✓	✓	✓		✓	✓	✓
Riverside County Transportation Dept. AD 161	$81,000,000	✓	✓	✓	✓		✓	✓	✓
Riverside County EDA Limonite Avenue Beautificaion	$3,200,000	✓	✓	✓	✓		✓	✓	
City of Ontario RDA, Fouth Street & Haven Avenue	$7,700,000	✓	✓	✓			✓		
City of Chino CFD No. 2003-3 (The Preserve)	$50,000,000	✓	✓	✓	✓	✓	✓	✓	✓
Jurupa Community Services District 2010 Sewer Facilities Bond Financing	$30,000,000	✓	✓	✓	✓		✓		
City of Fontana CFD No. 31 (Shady Trails)	$30,000,000	✓	✓	✓	✓	✓	✓		✓
Canyon Lake Property Owner Association Road Rehabilitation Project	$12,000,000	✓	✓				✓		
Coachella Valley Water District Kohl Ranch Improvement Project	$5,000,000				✓				✓
Riverside County EDA Varner/Monterey Improvements	$7,300,000	✓	✓						
Riverside County EDA Highway 79 Improvements	$4,000,000	✓	✓	✓			✓		
Jurupa Community Services District CFD No.1 Backbone Water & Sewer Facilities	$40,000,000				✓				✓
Western Municipal Water District Alessandro Pump Station Phases I & II	$17,600,000								✓
Jurupa Community Services District Eastvale Backbon Sewer & Water Improvements	$80,000,000				✓				✓

ALBERT A. WEBB ASSOCIATES





LSM LAND SURVEY & MAPPING

WEBB is a leader in developing survey techniques. With the large scale network established by State Plane Coordinates, the RTK capabilities of our multiple receiver systems are used to complete the ground survey control network of targets for aerial mapping in 1/10 the time of conventional survey methods. By using up to four receivers simultaneously, data can be collected in one-fourth the time of even Rapid Static GPS technology. This combined technology method maintains extreme accuracy over broadcast Real Time RTK methods while greatly reducing cost and time.

GIS data pre-purchased from commercial vendors for up-to-date parcel data throughout the region is combined with our state plane coordinate survey network of mapping to quickly produce base maps that provide extensive data beyond the typical alignment and right-of-way base map, without adding cost or time to the project.

RELEVANT SERVICES

- Boundary & Property Line Surveys
- ALTA Surveys
- Topographic Surveys
- Aerial Photogrammetric Surveys
- GPS Surveys
- Control Line Surveys
- Construction Layout
- Residential/Commercial Surveys
- Condominium Surveys
- GPS Positional Expert Services
- DTM Models
- As-Built Surveys
- GIS Data Surveys
- Settlement Monitoring Surveys
- Roadway & Building Pad Grade Certifications
- Potholing Location & Utility Data
- Bridge Surveys
- Tunnel & High Precision Surveys
- Interior Building Surveys
- Specialized Survey Services
- Legal Descriptions
- Plats of Highway Right-of-Way
- Flood Certificate Surveys
- Cadastral Surveys

LAND SURVEY & MAPPING

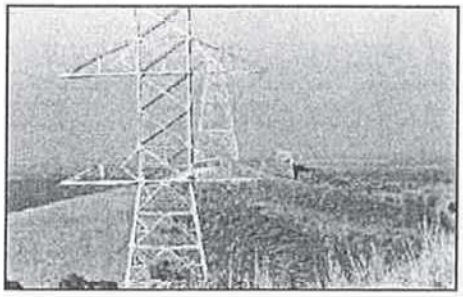
Michael Johnson, LS
Director

Michael Johnson is Director of Albert A. Webb Associates' (WEBB) Land Survey & Mapping Department. Beginning in 1987 and gaining his license as a professional land surveyor for California in 2000, Michael has 27 years of experience in all aspects of surveying from initial project coordination and research, performing survey data adjustments and analysis, to overseeing and providing construction staking through final as-built and ALTA surveys.

Michael has trained and supervised several field crews, including technical office and support staff. From entitlement to field survey and construction to delivery of a completed product, Michael has the knowledge and experience to provide the entire range of services any municipal, private development, or construction company has come to expect.

Jon Ros, LS
Professional Land Surveyor

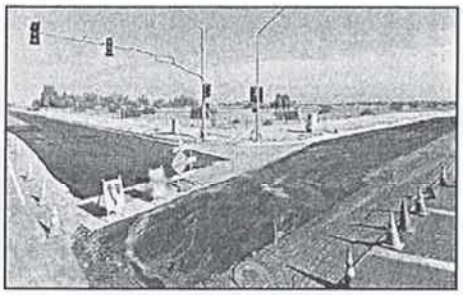
Jon Ros is a Survey Technician working in our Land Surveying Department at Albert A. Webb Associates (WEBB). He is a project surveyor with over 16 years of land surveying experience. His responsibilities include field to finish data management utilizing various cad platforms, analysis of survey data, preparation of land title descriptions and exhibits, right-of-way engineering for Cal Trans, the preparation of maps (subdivision), title documents, reports, earthwork calculation, project exhibits, and survey crew preparation and scheduling. Jon worked on a variety of projects including altas, the subdivision of land, property acquisition, and the preparation of records of survey. He is proficient in the use of several cad platforms such Terramodel, AutoCAD Civil 3D, and MicroStation & InRoads.



TRTP SEG 8 Chino Hills Project
Chino Hills

CMI GIS

- Undergrounding TRTP Segment Eight Transmission Lines
- Multi-Stakeholder Coordination
- Construction Staking
- Grading Hilly Terrain
- Erosion Control Plans



Ramon Road & Da Vall Drive Intersection Improvements
Rancho Mirage

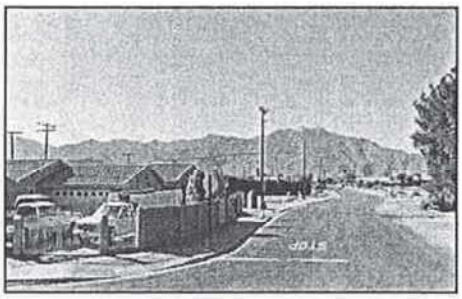
TT CMI SE

- Widening of Ramon Road Approximately 1,320 LF East and 1,320 LF North
- Dual Left Turn Lanes
- 8 FT Wide Class 1 Meandering Sidewalk
- Traffic Signal Improvements
- Signing and Striping Modifications

Varner & Monterey Improvements
Indio

TT EP CMI SE PE LD

- Roadway Widening (2-4 Lanes), Grind and Overlay
- Sidewalk, Driveway, Storm Drain, Raised Median, and Crosswalk Installation
- Property Owner Coordination
- Utility Coordination
- Right-of-Way Engineering



La Canada Way Street Improvements
Thousand Palms

TT CMI SE

- Engineering
- Surveying and Construction Staking
- Utility Coordination
- Construction Management
- Multi-Stakeholder Coordination

JCSD Waterline Replacement Program
Ontario

TT CMI

- Provided Survey Services to JCSD for 45 Years
- 10,000 LF of 8-in to 12-in Diameter Water Distribution Mains Annualy
- Preparation of Plans and Specifications
- Utility Research and Construction Management and Inspection Services
- Multi-Stakeholder/Multi-Agency Coordination

Washington Street Turn Lanes
La Quinta

TT SE

- Survey Cross-Sections at 50 FT Intervals
- Survey of the East Side of Washington Avenue, Avenue 48, and Eisenhower Drive
- Prepared the Plans, Specifications, Estimates (PS&E), and Contract Bid Documents
- Field Surveys Obtained Existing Curb and Gutter, Sidewalk, ADA Ramps, Median Curb, Catch Basin (Including Invert Elevation), Bus Turnout, Traffic Signal Equipment, Signs, Striping, Pavement Markings, Landscaping, and Underground and Overhead Utilities

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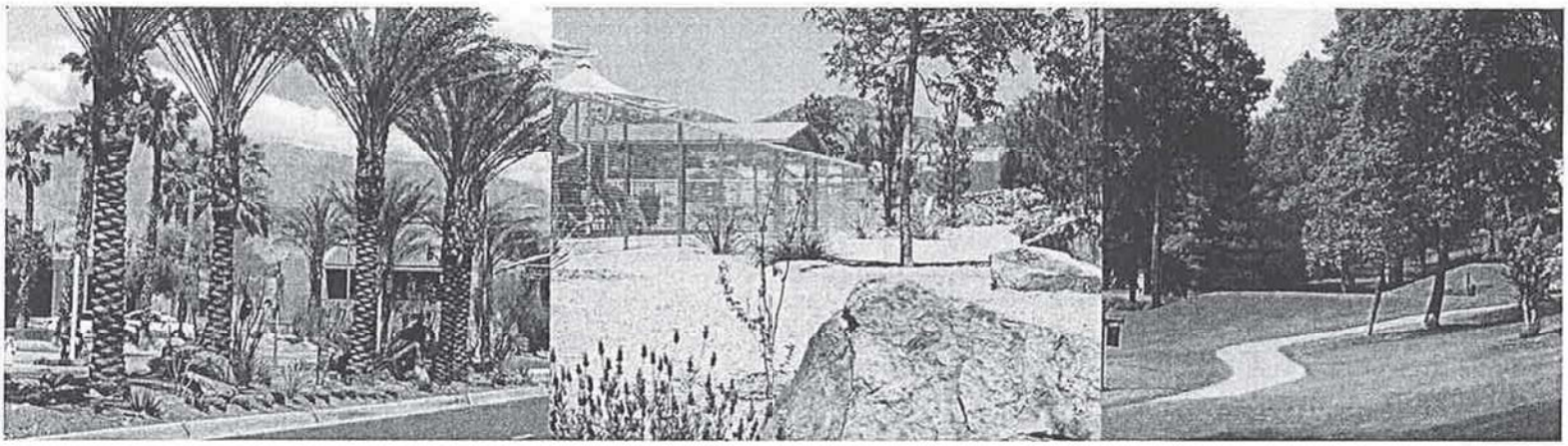
Harada Heritage Park
Mira Loma

TT LA CMI SE PS

- Design Survey and Construction Staking of 30-Acre Park Site
- Topographic Survey Included As-Built of Constructed Basin and Aerial Topographic Survey
- Construction Staking of All Facilities and Hardscape Improvements
- Utility and Drainage Staking Including Ball Field Lights, Walkway Lights, and Parking Area Lights
- Construction Staking for Street Improvements, Parking Curb, and Pavement with Trash Enclosure

LAND SURVEY PROJECTS		
Project	**Client**	**Location**
Riverside Water Quality Control Plant	City of Riverside	Riverside
The Villages of Lakeview	The Lewis Company	Upland
AD 12 Sewer Improvements	Mission Springs Water District	Desert Hot Springs
Community Facilities District No. 1	Jurupa Community Services District	Jurupa Valley
San Jacinto River Levee Stage 4 Project	Tri-Lake Consultants	San Jacinto
Highway 74 Design & Construction Management	County of Riverside	Riverside County
Mission Plaza Master Planned Community	Riverside County EDA	Riverside County
Construction Staking and Survey	County of San Bernardino	Cedar Glen
Clay Street Grade Separation Relocation	Jurupa Community Services District	Jurupa Valley
Plant Expansion Project	Western Riverside County Regional Wastewater Authority	Riverside County
Vista & Ellis Zone Water System Improvements	Eastern Municipal Water District	Riverside County
Hamner-Detroit Product Pipeline	Chino Basin Desalter Authority	Riverside County
Madison Street Improvement Project	City of Indio Public Works	Indio
Waterline Replacement Project	City of Ontario	Ontario
CDA Raw Water Intertie Pipeline	Chino Basin Desalter Authority	Ontario
Indian Avenue Sidewalk Improvements	County of Riverside EDA	Moreno Valley
Jurupa Road Trunk Sewer Improvements	Jurupa Community Services District	Jurupa Valley
Waterline Relocation at Wineville & 65th	Santa Ana River Water Company	Mira Loma
Mockingbird 12-in Emergency Pipeline	Western Municipal Water District	Riverside County
Master Plan Trunk Sewer in Hamner Avenue	City of Ontario	Ontario
Pyrite Avenue Street Improvements	County of Riverside EDA	Riverside County
Indian Hills Tank Piping Modifications	Jurupa Community Services District	Jurupa Valley

ALBERT A.
WEBB
ASSOCIATES



LA LANDSCAPE ARCHITECTURE

WEBB has practiced 'sustainability' in its designs long before the term became popular. We recognize our obligation to incorporate environmental, economic, and social sustainability into our design process. We are well acquainted with all local and state water ordinances and practice California friendly landscape design. We design our own irrigation plans and employ the latest advances in water conservation and designing landscapes that require relatively little water and maintenance, yet look lush and beautiful.

PROJECT TYPES

- Land Development
- Streetscape
- Commercial/Retail
- Industrial
- Parks
- Schools
- Public Works/Municipalities
- Sport Facilities

SERVICES

- Master Planning
- Recycled Water Use Planning
- Design Concept Development
- Design Guideline Development
- Construction Documents
- Cost Estimating
- Construction Observation
- 3-D Landscape Modeling
- Photo Simulations

LA LANDSCAPE ARCHITECTURE

Jaime Macias, LA
Landscape Architect

Jaime Macias is a licensed Landscape Architect with over 12 years of planning, design, and project management experience. He currently leads the Landscape Architecture Department at Albert A. Webb Associates (WEBB) and is responsible for directing all landscape design efforts, managing the preparation of all conceptual and construction landscape plans, and providing all construction observation, testing, and auditing services.

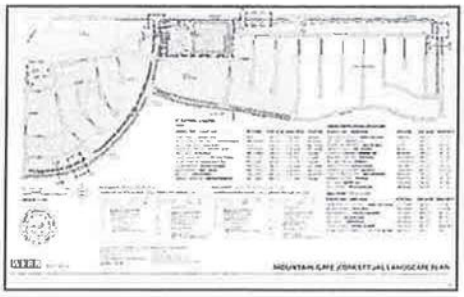
Jaime has a strong understanding of the design and construction process along with broad experience in implementation of green infrastructure. He has led a wide variety of landscape projects in both public and private developments including residential, commercial, industrial, schools, parks, trails, sports complexes, water basins, and transportation corridors. His extensive knowledge on drought tolerant plants, hardscape materials, and irrigation systems allow him to produce high quality landscape solutions that are enduring and sustainable. Jaime also has in-depth experience in regional recycled water use design guideline criteria and development procedures.

Giovani Aguirre
Landscape Designer

Giovani Aguirre is a Landscape Designer who has been with Albert A. Webb Associates (WEBB) since 2011. Giovani's experience includes developing conceptual landscape plans, graphic representations, and planting designs with both public and private clients. In addition to landscape plans, Giovani also provides general design development that includes trail design, entry monument design, conceptual streetscape design, presentation graphics, construction documents, and schematic detail design for WEBB's commercial/industrial, residential development, and traffic and transportation markets.

Guillermo Gonzalez
Landscape Designer

Guillermo Gonzales is a Landscape Designer at Albert A. Webb Associates (WEBB) with a strong irrigation and planting background. Guillermo's experience at WEBB includes developing complicated potable and recycled water irrigation systems, planting layouts, and material specification for public and private projects. Using the latest design software, his high level of computer experience allows him to prepare construction documents, conceptual landscape plans, and planning exhibits with ease. In addition, Guillermo also provides general design development support which includes preparing construction specifications, cost estimates, and schematic detail designs for WEBB's commercial/industrial, residential development, and traffic and transportation markets.



Tentative Tract Map No. 36430 - Mountain Gate
Riverside County

LA PE TT CMI SE LM LD GIS

- Low Maintenance Sustainable Landscape
- Conceptual Landscape Plan
- Fence and Wall Plans
- Landscape Area Maintenance Plans
- Planting Plans and Details
- Landscape Construction Documents
- Preliminary Grading and Drainage Design

Grand Terrace Fitness Park (3-Acre Park Design)
Grand Terrace

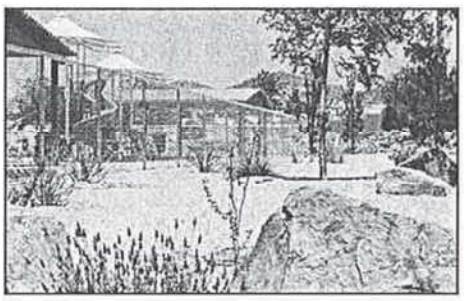
LA

- Public Outreach
- Low Maintenance and Operating Cost
- Water Conservation Garden
- Fitness Themed Park

Victor Valley College Landscape Sustainability Upgrades
Victorville

LA

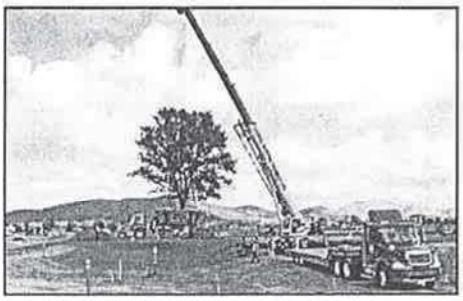
- Design and Construction Documents
- Sustainability and Low Maintenance
- High Aesthetic Quality to Meet College Needs
- Low Water Use Irrigation Design



Apple Valley North Early Education Center
Apple Valley

LA

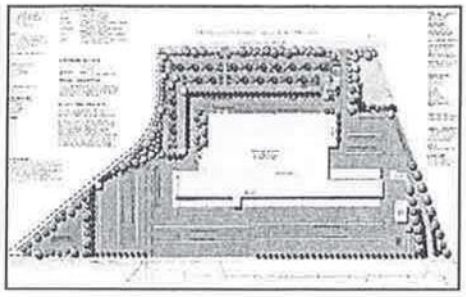
- Coordination with Architect to Match Building Design
- Sustainable Landscape
- Low Maintenance
- Erosion Control
- Weather-Based Smart Irrigation Controller



Menifee Town Center
Menifee

LA TT CMI SE LM GIS

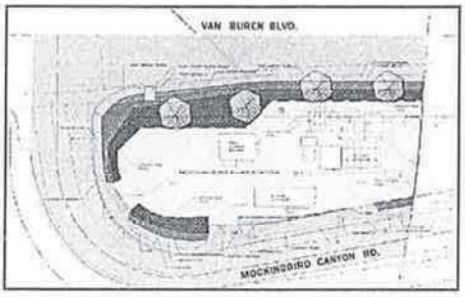
- Conceptual Plans & Landscape Improvement Plans
- 7 FT Wide Planted Parkways & Decorative Media
- Custom Monument Sign
- Roundabout
- Accent Landscape Lighting
- Low Maintenance, Sustainable Landscaping



FedEx Ground Hub Parking Lot Expansion
Rialto

LA PE TT CMI SE LD GIS

- Landscape Construction Documents
- Irrigation System Analysis
- Parking Lot Landscape Plans
- Planting Plans and Details
- Low Maintenance Sustainable Landscape
- Weather-Based Smart Irrigation Controller

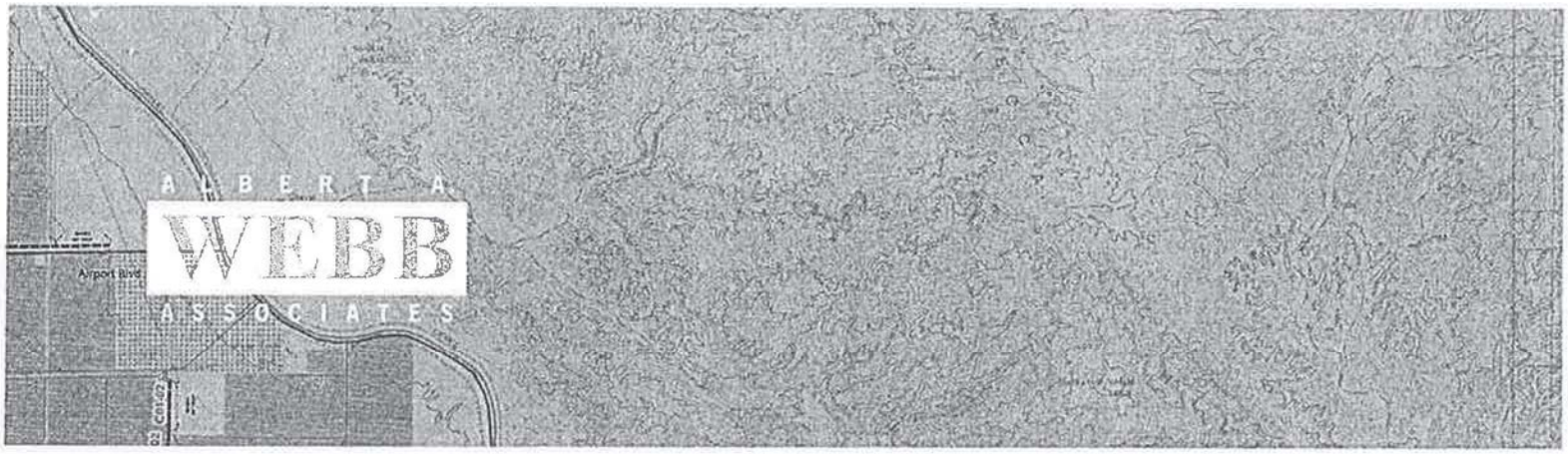


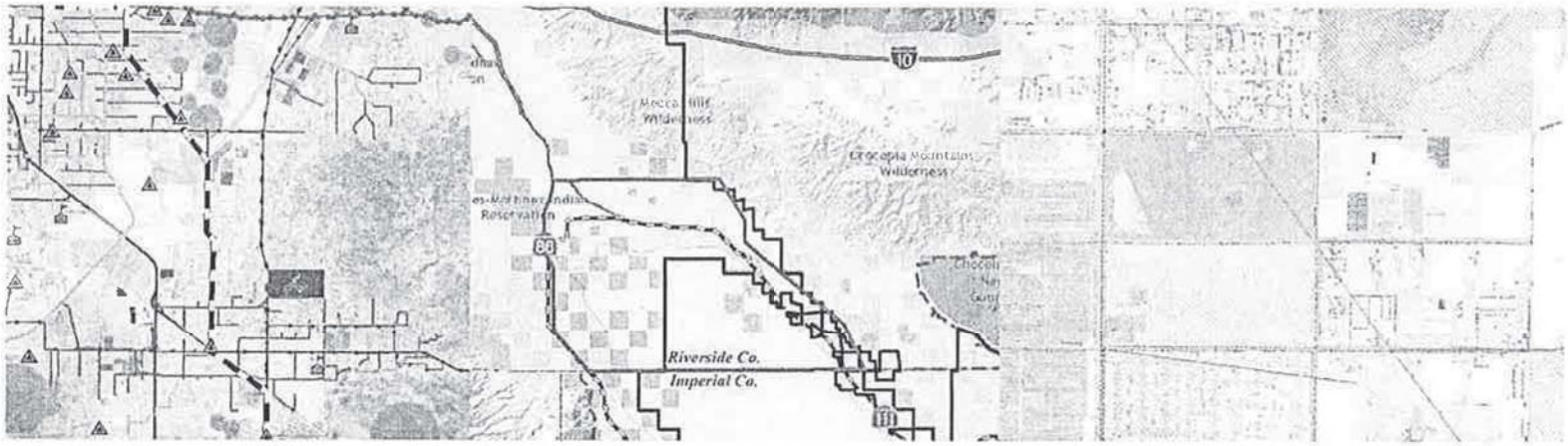
Mockingbird Pump Station
Riverside County

LA CMI

- Designed and Provided Construction Support Services
- Conceptual Landscape Plans
- Construction Documents
- Low Maintenance Landscape
- High Aesthetic Quality

LANDSCAPE ARCHITECTURE PROJECTS		
Project	**Client**	**Location**
Bagdouma Park Renovation	City of Coachella	Coachella
Limonite Avenue Beautification Project	Riverside County EDA	Riverside County
Perris Boulevard Street and Storm Drain	City of Moreno Valley	Moreno Valley
Eight Park Evaluation and Improvements	City of Indio	Indio
Bellegrave Avenue Street Improvements	Jurupa Valley Sports Park	Jurupa Valley
Comprehensive Park and Facilities Master Plan	City of Colton	Colton
Street Frontage Evaluations	Jurupa Community Services District	Jurupa Valley
Menifee Town Center Landscape Design	Regent Properties	Menifee
Yucca Valley School Landscape Design	Frick, Frick, & Jette Architects	Yucca Valley
General Landscape Architectural Services	Jurupa Community Services DIstrict	Jurupa Valley
Hesperia Jr. H.S. Landscape and Irrigation Design	Frick, Frick, & Jette Architects	Hesperia
Del Rey Elementary School Landscape Services	Frick, Frick, & Jette Architects	Victorville
Alaska USA Credit Union Landscape Design	Alaska USA Federal Credit Union	Victorville
Marcy Library Landscape Plans	City of Riverside	Riverside
Park Irrigation System Evaluation	Jurupa Community Services District	Jurupa Valley
Water Quality Basin Design and Landscape	Stratham Homes	Eastvale





GIS GEOGRAPHIC INFORMATION SYSTEMS

WEBB's GIS Department uses Esri technology to create detailed exhibits, interactive web-based maps, and Google Earth KML files. We create custom products in a variety of formats including high quality maps for reports, legal documents, PowerPoint slides, web-based interactive displays, atlas maps, tax assessment administration and tracking, line of sight analyses, and linking interactive maps to related documents such as as-built drawings and photographs.

The strength of the WEBB GIS Department lies in our integration with other WEBB Departments, from Assessment to Planning to Wastewater, allowing us to provide a full suite of services to our clients. For example, system models and CAD data can be integrated with GIS to provide superior graphics, analyses, and web-based delivery systems.

CARTOGRAPHIC PRODUCTS

- Web-based, interactive map viewers
- Map services that can be consumed by a variety of clients
- GPS or mobile device background displays
- Large-format displays, reports, and documents
- Atlas maps
- Project visualizations – 3-D views
- Linking maps to documents (i.e as-built drawings) and photographs
- Design scenarios and custom decision-making tools
- KML files for use with Google Earth

DATA CREATION/CONVERSION

- Scanning and geo-referencing hardcopy documents
- Conversion to and from CAD and other electronic data formats
- Data cleanup and QA/QC
- GPS/Survey data collection and integration

CLIENT SERVICES

- GIS database design
- On-site training and staffing
- Custom websites and web maps
- Sewer and Water Master Plans
- Environmental constraints analyses
- Demand forecasting and capacity modeling
- Market analyses and project siting alternatives
- Facility management and development tracking

GIS GEOGRAPHICINFORMATION SYSTEMS

Nanette Pratini, GISP
GIS Specialist

Nanette Pratini is an expert in Geographic Information Systems analysis with extensive training and experience. She uses state of the art GIS technology to prepare maps for presentations and documents and for performing analyses and modeling of geospatial data. She also coordinates with Associates in Information Systems, Engineering, Planning, and Hydrology to integrate GIS into workflows and web-based delivery systems for our clients.

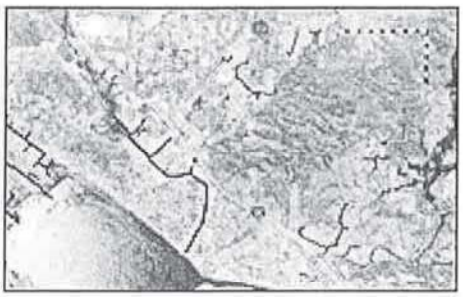
Ms. Pratini has over 23 years of experience in GIS and was involved in several groundbreaking GIS applications for the University of California and the Bureau of Land Management. She has developed relationships with several local agencies and is familiar with their GIS-related policies and procedures. She is also responsible for maintaining the accuracy and integrity of GIS data for various public agencies, integrating CAD-based drawings with GIS and creating electronic atlas maps for district field personnel.

Jack Curtright
GIS Associate

Jack Curtright has over ten years of experience in Geographic Information Systems, six of them employed by Albert A. Webb Associates, performing a variety of GIS services for most of the departments in the company.

Jack produces all of the tax assessment audit maps for the annual reports that are prepared for our clients, as well as boundary maps and assessment diagrams for recording with local counties, parolee proximity HEAT maps, and the production of KML (Google Earth) files for research and marketing purposes.

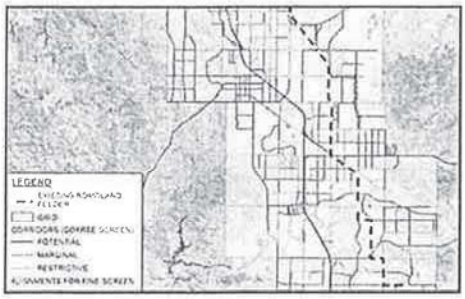
He has performed extensive work for one of Webb's oldest clients, the Crestline-Lake Arrowhead Water Agency (CLAWA). This work includes geo-referencing numerous old maps and engineering drawings in order to create GIS data to represent the water system, special maps within CLAWA's sphere of influence depicting such things as earthquake faults, fire hydrant inventory, and property ownership for land exchanges. He is currently in the process of developing a map of CLAWA's facilities using ArcGIS Online, which contains hyperlinks to their engineering drawings.



Lake Elsinore Master Drainage Plan Update
Lake Elsinore

GIS SE TT

- Coordination with City Staff and WEBB engineers to create, acquire, and convert datasets
- GPS and Esri collector data collection
- Watershed delineations
- QA/QC procedures and metadata
- Web-based map viewers
- Landuse analyses from General Plans and Specific Plans



Perris Valley Transmission Alignment Study
Perris

GIS SE TT LA CMI PE

- Collected data for existing utilities and master planned facilities
- Detailed atlas sheets for proposed alignments
- Comprehensive assessment tools and datasets to rank alternative alignments, easement acquisition, constructability, space availability, and environmental impact
- Metadata and training provided for the District's GIS Department

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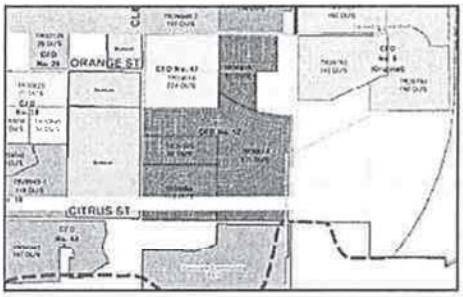
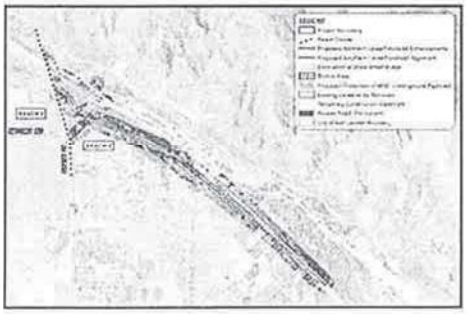


Jurupa Community Services District GIS Services
Jurupa Valley

GIS

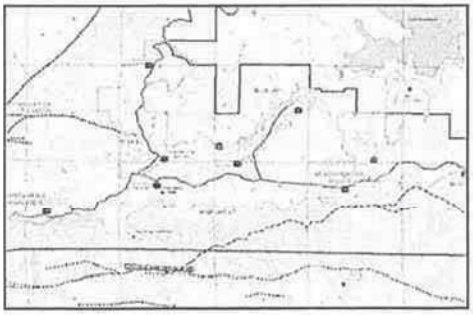
- Created and maintained a GIS database of District assets from plans and CAD data
- Web-based map viewer for JCSD field personnel
- Status maps of development projects
- Assessment maps and audits
- Sewer and Water Master Plans
- Directorial Division Redistricting



San Jacinto River Levee Stage 4
San Jacinto

GIS TT LA PE

- DBESP, LESA, and habitat analyses
- Extensive coordination with WEBB engineers, subcontractors, and regulatory agencies
- EIR analyses and figures
- Conceptual reserve design



Crestline-Lake Arrowhead Water Agency GIS Services
Crestline

GIS

- Geo-referencing engineering documents
- Digitize pipeline and system hardware
- Earthquake faults study
- Fire hydrant inventory map
- Property ownership and land-exchange maps
- Online document retrieval of engineering documents

ALBERT A.
WEBB
ASSOCIATES

Corporate Headquarters
3788 McCray Street
Riverside, CA 92506
951.686.1070

Palm Desert Office
41-990 Cook St., Bldg. I - #801B
Palm Desert, CA 92211
951.686.1070

Murrieta office
41391 Kalmia Street #320
Murrieta, CA 92562
951.686.1070

Val Verde Unified School District

975 W Morgan Street • Perris, CA 92571 • 951-940-6100

November 16, 2016

Tom Barnes

RE: DWR - Perris Dam Emergency Release Facility

Environmental Science Associates
626 Wilshire Blvd., Suite 1100
Los Angeles, CA 90017
Re: Comment Letter - Perris Dam Emergency Release Facility Project Draft EIR
Dear Mr. Barnes,

The Val Verde Unified School District (District) appreciates the opportunity to comment on the Draft Environmental Impact Report (EIR) for the Perris Dam Emergency Release Facility project. The District has the following comment:

1. COMMENT A: The District is opposed to the complete closure of Evans Road (Option B) during bridgework activity. Closure of Evans Road for one year will create a significant impact to nearby schools by worsening traffic conditions in the area. END COMMENT A

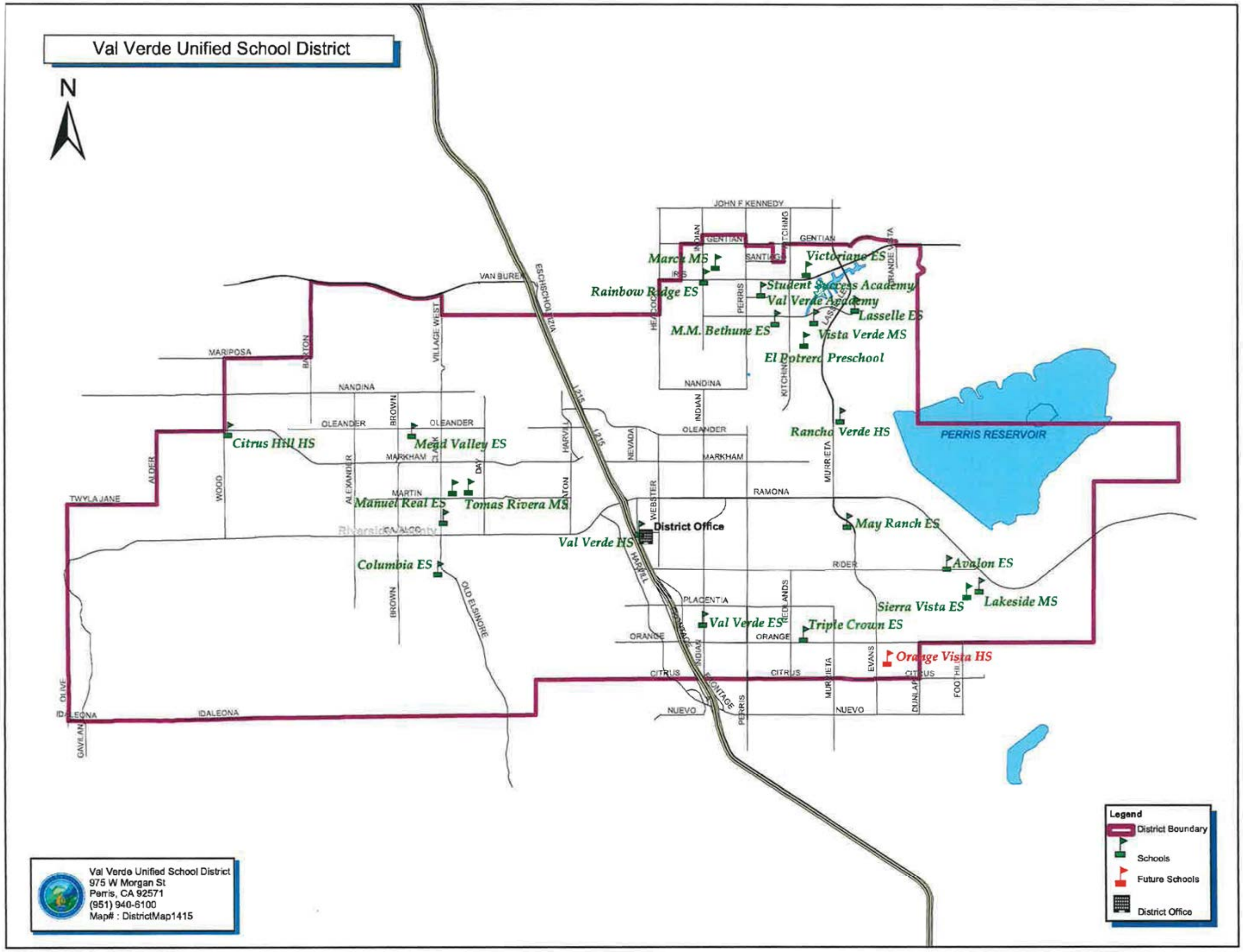
2. COMMENT B: The District concurs with the City of Perris that the traffic signal timingshould also be modified at the Evans Road and Ramona Expressway and further south at the traffic signal on Morgan/Evans near May Ranch Elementary School. END COMMENT B:

I have enclosed a District map showing school locations as well as a District Calendar to assist you with further planning.

Again, thank you for the opportunity to comment on the Draft EIR. If you require additional information or clarification, please contact me at (951)940-6100, ext.10652.

Stacey Strawderman
Director, Facilities, Contracts and Purchasing Services
Val Verde Unified School District

Enclosures(2)
SS:mm


Val Verde Unified School District
N
Marck MS
Victoriano ES
Rainbow Ridge ES
Student Success Academy
Val Verde Academy
Lasselle ES
M.M. Bethune ES
Vista Verde MS
El Potrero Preschool
Rancho Verde HS
PERRIS RESERVOIR
Citrus Hill HS
Mead Valley ES
Manuel Real ES
Tomas Rivera MS
District Office
Val Verde HS
May Ranch ES
Columbia ES
Avalon ES
Sierra Vista ES
Lakeside MS
Val Verde ES
Triple Crown ES
Orange Vista HS
JOHN F KENNEDY
GENTIAN
SANTIAGO
IRIS
VAN BUREN
ESCHSCHOLTZIA
MARIPOSA
BARTON
VILLAGE WEST
NANDINA
OLEANDER
BROWN
MARKHAM
ALEXANDER
DAY
HARVILL
I-215
NEVADA
INDIAN
PERRIS
KITCHING
MURRIETA
TWYLA JANE
ALDER
WOOD
MARTIN
RAMONA
WEBSTER
RIDER
PLACENTIA
REDLANDS
ORANGE
OLD ELSINORE
FRONTAGE
EVANS
CITRUS
DUNLAP
FOOTHILL
NUEVO
IDALEONA
OLIVE
GAVILAN
Legend
District Boundary
Schools
Future Schools
District Office
Val Verde Unified School District
975 W Morgan St
Perris, CA 92571
(951) 940-6100
Map# : DistrictMap1415

Current School Year

VAL VERDE UNIFIED SCHOOL DISTRICT

REVISED 2016-2017 District Attendance Calendar

Board Approved 03/01/16

JULY					AUGUST					SEPTEMBER					OCTOBER					NOVEMBER					DECEMBER				
M	T	W	Th	F	M	T	W	Th	F	M	T	W	Th	F	M	T	W	Th	F	M	T	W	Th	F	M	T	W	Th	F
				1	1	2	3	4	5				1	2	3	4	5	6	7		1	2	3	4				1	2
4	5	6	7	8	8	9	10	11	12	5	6	7	8	9	10	11	12	13	14	7	8	9	10	11	5	6	7	8	9
11	12	13	14	15	15	16	17	18	19	12	13	14	15	16	17	18	19	20	21	14	15	16	17	18	12	13	14	15	16
18	19	20	21	22	22	23	24	25	26	19	20	21	22	23	24	25	26	27	28	21	22	23	24	25	19	20	21	22	23
25	26	27	28	29	29	30	31			26	27	28	29	30	31					28	29	30			26	27	28	29	30

JANUARY					FEBRUARY					MARCH					APRIL					MAY					JUNE				
M	T	W	Th	F	M	T	W	Th	F	M	T	W	Th	F	M	T	W	Th	F	M	T	W	Th	F	M	T	W	Th	F
2	3	4	5	6			1	2	3			1	2	3	3	4	5	6	7	1	2	3	4	5				1	2
9	10	11	12	13	6	7	8	9	10	6	7	8	9	10	10	11	12	13	14	8	9	10	11	12	5	6	7	8	9
16	17	18	19	20	13	14	15	16	17	13	14	15	16	17	17	18	19	20	21	15	16	17	18	19	12	13	14	15	16
23	24	25	26	27	20	21	22	23	24	20	21	22	23	24	24	25	26	27	28	22	23	24	25	26	19	20	21	22	23
30	31				27	28				27	28	29	30	31						29	30	31			26	27	28	29	30

Important Dates

Aug 4	All Teachers Report
Aug 4 - 9	Teacher Staff Development
Aug 10	School Year Begins
Aug 24	6-8 Back to School Night
Aug 31	K-5 Back to School Night
Sept 7	9-12 Back to School Night
Sept 29	Parent Conference Day (6-8)
Oct 10	Non-Teacher/Non-Student Day
Nov 1	End of 1st Trimester (K-5)
Nov 15-18	Parent Conference Day (K-5)
Nov 21 - 25	Thanksgiving Break
Dec 16	End of 1st Semester
Dec 19-Jan 2	Winter Recess
Jan 3	Staff Development Day/Non-Student Day
Feb-May	Physical Fitness Testing (5, 7, 9)
Feb 10	End of 2nd Trimester (K-5)
Feb 23	Parent Conference Day (6-8)
Mar 8-10	Parent Conference Day (K-5)
Mar 27 - 31	Spring Break
Feb 23 –May 31	SB Testing (3-8)
Apr 6 – May 31	SB Testing (11)
Apr 17	Non-Teacher/Non-Student Day
May 31	Last Day of School (K-12)
May 31	Teacher Check-out Day

Holidays

July 4	Independence Day
Sept 5	Labor Day
Nov 11	Veterans Day
Nov 24	Thanksgiving Day
Nov 25	Local Holiday
Dec 23	Local Holiday
Dec 26	Winter Holiday
Dec 30	Local Holiday
Jan 2	New Year's Day Observed
Jan 16	Martin Luther King Day
Feb 13	Lincoln Day Observed
Feb 20	Presidents' Day
Apr 14	Local Holiday
May 29	Memorial Day

Attendance Days

08/08-09/02	18 days
09/05-09/30	19 days
10/03-10/28	19 days
10/31-11/25	14 days
11/28-01/06	18 days
01/09-02/03	19 days
02/06-03/03	18 days
03/06-03/31	15 days
04/03-04/28	18 days
05/01/05/26	20 days
05/29-05/31	2 days
Total	180 days

6-12 Benchmark Grading Period Ends
September 16, 2016, October 28, 2016, December 16, 2016, February 10, 2017, March 24, 2017, May 31, 2017

Deficiency Notices/
K-5 Trimester Grading Period Ends
September 23, 2016/November 1, 2016
January 13, 2017/February 21, 2017
April 13, 2017/May 31, 2017

Minimum Days

K-5

Aug	10, 17, 24, 31
Sept	7, 14, 21, 28
Oct	5, 12, 19, 26
Nov	2, 9, 15, 16, 17, 18, 30
Dec	7, 14, 16
Jan	4, 11, 18, 25
Feb	1, 8, 15, 22
Mar	1, 8, 9, 10, 15, 22
Apr	5, 12, 19, 26
May	3, 10, 17, 24, 25, 26, 30, 31

6-8 ★

Aug	10, 17, 24, 31
Sept	7, 14, 21, 28, 29, 30
Oct	5, 12, 19, 26
Nov	2, 9, 16, 30
Dec	7, 14, 16
Jan	4, 11, 18, 25
Feb	1, 8, 15, 22, 23, 24
Mar	1, 8, 15, 22
Apr	5, 12, 19, 26
May	3, 10,17, 24, 25, 26, 30, 31

9-12

Aug	17, 24, 31
Sept	7, 14, 21, 28
Oct	5, 12, 19, 26, 27, 28
Nov	2, 9, 16, (30 RVHS Only)
Dec	7, 14, 15, 16
Jan	11, 18, 25
Feb	1, 8, 15, 22
Mar	1, 8, 15, 22, 23, 24 (22 CHHS Only)
Apr	5, 11, 12, 19, 20, 26
May	3, 24, 30, 31 (10, 17, 25, 26 CHHS Only), (12 RVHS Only)

Legend

- △ School Year Begins/Ends
- □ Legal Holiday
- ◇ Local Holiday
- ⬡ Parent Conference Days (K-5)
- ⬠ Parent Conference Days (6-8)
- • Grading Period Ends 6-12
- ■ Trimester Ends K-5
- Fall/Winter/Spring Break
- ○ Staff Development Days
- ☆ Non-Student Days
- Teacher Contract Days
- Non-Teacher Work Days

★ 6th Graders at Val Verde Elementary School and Sierra Vista Elementary School will follow 6-8 Minimum Day Schedule.

Next School Year

VAL VERDE UNIFIED SCHOOL DISTRICT

2017-2018 District Attendance Calendar

Board Approved 03/01/16

JULY

M	T	W	Th	F
3	4	5	6	7
10	11	12	13	14
17	18	19	20	21
24	25	26	27	28
31				

AUGUST

M	T	W	Th	F
	1	2	3	4
7	8	9	10	11
14	15	16	17	18
21	22	23	24	25
28	29	30	31	

SEPTEMBER

M	T	W	Th	F
				1
4	5	6	7	8
11	12	13	14	15
18	19	20	21	22
25	26	27	28	29

OCTOBER

M	T	W	Th	F
2	3	4	5	6
9	10	11	12	13
16	17	18	19	13
23	24	25	26	27
30	31			

NOVEMBER

M	T	W	Th	F
		1	2	3
6	7	8	9	10
13	14	15	16	17
20	21	22	23	24
27	28	29	30	

DECEMBER

M	T	W	Th	F
				1
4	5	6	7	8
11	12	13	14	15
18	19	20	21	22
25	26	27	28	29

JANUARY

M	T	W	Th	F
1	2	3	4	5
8	9	10	11	12
15	16	17	18	19
22	23	24	25	26
29	30	31		

FEBRUARY

M	T	W	Th	F
			1	2
5	6	7	8	9
12	13	14	15	16
19	20	21	22	23
26	27	28		

MARCH

M	T	W	Th	F
			1	2
5	6	7	8	9
12	13	14	15	16
19	20	21	22	23
26	27	28	29	30

APRIL

M	T	W	Th	F
2	3	4	5	6
9	10	11	12	13
16	17	18	19	20
23	24	25	26	27
30				

MAY

M	T	W	Th	F
	1	2	3	4
7	8	9	10	11
14	15	16	17	18
21	22	23	24	25
28	29	30	31	

JUNE

M	T	W	Th	F
				1
4	5	6	7	8
11	12	13	14	15
18	19	20	21	22
25	26	27	28	29

Important Dates

Aug 3	All Teachers Report
Aug 4-8	Teacher Staff Development
Aug 9	School Year Begins
Aug 22	6-8 Back to School Night
Aug 30	K-5 Back to School Night
Sept 6	9-12 Back to School Night
Sept 28	Parent Conference Day (6-8)
Oct 9	Staff Development Day/Non-Student Day
Nov 1	End of 1st Trimester (K-5)
Nov 14-17	Parent Conference Day (K-5)
Nov 20 - 24	Thanksgiving Break
Dec 15	End of 1st Semester
Dec 18-Jan 1	Winter Recess
Jan 2	Staff Development Day/Non-Student Day
Feb-May	Physical Fitness Testing (5, 7, 9)
Feb–May	SB Testing (3-8)
Feb 20	End of 2nd Trimester (K-5)
Feb 22	Parent Conference Day (6-8)
Mar 7-9	Parent Conference Day (K-5)
Apr–May	SB Testing (11)
Apr 2 - 6	Spring Break
Apr 9	Non-Teacher/Non-Student Day
May 30	Last Day of School (K-12)
May 30	Teacher Check-out Day

Holidays

July 4	Independence Day
Sept 4	Labor Day
Nov 10	Veterans Day Observed
Nov 23	Thanksgiving Day
Nov 24	Local Holiday
Dec 22	Local Holiday
Dec 25	Winter Holiday
Dec 29	Local Holiday
Jan 1	New Year's Day
Jan 15	Martin Luther King Day
Feb 12	Lincoln Day
Feb 19	Presidents' Day
Mar 30	Local Holiday
May 28	Memorial Day

Attendance Days

08/07-09/01	17 days
09/04-09/29	19 days
10/02-10/27	19 days
10/30-11/24	14 days
11/27-01/05	18 days
01/08-02/02	19 days
02/05-03/02	18 days
03/05-03/30	19 days
04/02-04/27	15 days
04/30-05/25	20 days
05/28-05/31	2 days
Total	180 days

6-12 Benchmark Grading Period Ends
September 15, 2017, October 27, 2017,
December 15, 2017, February 9, 2018,
March 23, 2018, May 30, 2018

Deficiency Notices/
K-5 Trimester Grading Period Ends
September 22, 2017/November 1, 2017
January 12, 2018/February 20, 2018
April 13, 2018/May 30, 2018

Minimum Days

K-5

Aug	9, 16, 23, 30
Sept	6, 13, 20, 27
Oct	4, 11, 18, 25
Nov	1, 8, 14, 15, 16, 17, 29
Dec	6, 13, 15
Jan	3, 10, 17, 24, 31
Feb	7, 14, 21, 28
Mar	7, 8, 9, 14, 21, 28
Apr	11, 18, 25
May	2, 9, 16, 23, 24, 25, 29, 30

★ 6-8

Aug	9, 16, 23, 30
Sept	6, 13, 20, 27, 28, 29
Oct	4, 11, 18, 25
Nov	1, 8, 15, 29
Dec	6, 13, 15
Jan	3, 10, 17, 24, 31
Feb	7, 14, 21, 22, 23, 28
Mar	7, 14, 21, 28
Apr	11, 18, 25
May	2, 9, 16, 23, 24, 25, 29, 30

9-12

Aug	16, 23, 30
Sept	6, 13, 20, 27
Oct	4, 11, 18, 25 (26, 27 RVHS Only)
Nov	1, 8, 15, 29
Dec	6, 13, 14, 15
Jan	10, 17, 24, 31
Feb	7, 14, 21, 28
Mar	7, 14, 21, 28 (29 RVHS Only)
Apr	11, 18, 25 (19, 26 CHHS Only)
May	2, 9, 16, 23, 24, 25, 29, 30

★ 6th Graders at Val Verde Elementary School and Sierra Vista Elementary School will follow 6-8 Minimum Day Schedule.

Legend

- △ School Year Begins/Ends
- □ Legal Holiday
- ◇ Local Holiday
- ⬡ Parent Conference Days (K-5)
- ⬠ Parent Conference Days (6-8)
- • Grading Period Ends 6-12
- ■ Trimester Ends K-5
- Fall/Winter/Spring Break
- ○ Staff Development Days
- ☆ Non-Student Days
- Teacher Contract Days
- Non-Teacher Work Days

ESA

626 Wilshire Boulevard
Suite 1100
Los Angeles, CA 90017
213.599.4300 phone
213.599.4301 fax

www.esassoc.com

meeting notes

project	DWR ERF EIR	project no.	120083.02
date	October 17, 2016	time	6 PM
present		route to	
subject	DWR ERF EIR Scoping Meeting Oral Comments		

action required: Oral comments received during the Draft EIR scoping meeting that will be considered during preparation of the Final EIR.

On September 27, 2016, a CEQA public scoping meeting was held at the Lakeview Pavilion in Lake Perris State Recreational Area in Perris, CA and led by Project Director Tom Barnes. There were 7 attendees in addition to the DWR and ESA staff and the following comments were recorded:

Attendee	Comment/Question
Kenneth Phung City of Perris	My name is Kenneth Phung, I am with the City of Perris. We appreciate you working with us throughout the draft EIR. COMMENT A: Not only from the City's standpoint, but all also all of the other residents and local businesses in the area, the Fairgrounds. In relation to that, there are some concerns that we have in the draft EIR. I think you mentioned that there is full closure or partial closure. I think from the City's standpoint, partial closure is the recommended approach. I think any time you have full closure there are too many impacts to the residences and commercial businesses in the area. So if you proceed we want you to proceed with the partial closure option. END COMMENT A COMMENT B: In relation to that, in terms of the traffic impacts, I think some things you should probably consider is probably retaining additional police services during the peak hour just for them to monitor traffic to make sure that safety concerns are addressed and people are not speeding. See if individual funding somehow exists for that. I think it's good to have an ongoing traffic consultant out there initially so that they can monitor the beginning process… So that way we can figure out during the process if we need to adjust the signalization, so that we can adjust during the process. I think that would reduce some issues. I think we want to work with County and City of Perris, not only the county but the City of Perris also. END COMMENT B. COMMENT C: Other concerns that we have, construction hours, you mentioned, you really want to do nighttime construction. Our opinion is that you should only do it from 7am to 7pm, which is the construction standard for our project at Perris. The reason for that is because there are residents close by, businesses close by that operates at night, the Fairgrounds operate at night. You have residents that live just right across from Ramona Expressway. Even a little noise would affect someone's sleep. So I think it is really important that you stick to a plan and say you really will not do it at nighttime. I think you should really look at that. END COMMENT C. COMMENT D: Other than that, just construction traffic. If there is any way you can move it off of Ramona Expressway. There is already a lot of traffic, the early morning or the late evening when people are

coming home. Any way that you can push off traffic one way or another away from Ramona Expressway, that would alleviate some concerns or alleviate traffic. END COMMENT D. COMMENT E: The last thing is, I think it is your plan already, just make sure construction staging is off from Ramona Expressway. Any way to run traffic internally, minimize traffic on Ramona Expressway. Those are our concerns for the City of Perris. Correct, we'll send a letter in a couple of weeks. END COMMENT E

Catherine Fields

Resident

COMMENT F: Catherine: My main concern is of Evans Road. I live south of Ramona Expressway and east of Evans road. In the morning, traffic is very heavy there at Ramona expressway and Evans because of school traffic and the kids going to Rancho Val Verde up there; and the traffic is tremendous there in the morning. It takes you almost 30 minutes to go from Ramona Expressway and up to the school because with all the kids getting dropped off and in the street and stuff; and in the evening it's the same way. So if you close this off completely it will be like shutting us off from going to Moreno Valley and lot of us go shopping in Moreno Valley. There would only be one way to go would be Perris Boulevard or take the freeway and you got to go way back down and even if you take Perris Boulevard, you still have to go back down to the shopping area to shop at. So this would be really, really inconvenient to the residents there.

Tom B: Yes, thank you for the comment, we appreciate that. There is a detour map that we have here as well, but that's an excellent comment. END COMMENT F

COMMENT G: Catherine: And the other concern I have is um, the… you spoke about the liquefying of the dam if we have an earthquake, ok; my concern is why is the City still allowing the builders to continue building these houses below the dam?

Tom B: That's a good question that I can't answer today but I can say that the department as you're witnessing over the past year, and will continue to work and remediate the dam per the standards of the division of safety dams and that process is ongoing. That's a good comment and put in the record. END COMMENT G

Jasmine Ochoa

Resident

COMMENT H: Jasmine: I have a question and you won't be able to answer it right now. I am a resident off of Evans and Ramona Expressway; we are literally by the dam. Why are we doing unlined channels? If there were contamination, that would ultimately go into the ground, and we just don't want to repeat history. People have dealt with contamination before and if it is going to be a long term project then you want to avoid any other projects in the future. Think about that. END COMMENT H

COMMENT I: Another thing is the noise pollution; it causes a lot of stress and agitation. There are many studies out there that show the impacts that it has on humans. That is definitely one of the biggest concerns. END COMMENT I. COMMENT J: As well as the stress that is coming from the traffic, definitely for the partial closure of Evans since that is the only route to get home; unless you want to go a further route which is of course more expensive on gas and more impact on the vehicles. END COMMENT J

COMMENT K: And if we could not have operation at night, just because that is the only window of sleep. That's when traffic dies and we can finally relax and not hear the cars passing by and we don't want to hear construction at night, and let us know what the operation hours are; so if the construction hours are at 7am and they start at 6am to finish faster, we don't want any violation of that, if you were to go that route, which we hope you wouldn't. END COMMENT K

Tom B: Ok, thank you for those.

Richard Tovar

Cal Fire

COMMENT L: Richard: My name is Richard Tovar with the Riverside County Fire Department, Cal Fire. I work with the Chief of Planning Bureau. So we directly have interest in the EIR. The question I have is, you said three years is the downtime? Construction time?

Tom B: Yes, 3 years of construction time. And the different options are 12 months or 24 months on the bridges. END COMMENT L

COMMENT M: Richard: Ok, now you said you said were going to do complete closure on Evans?

Tom B: The options for Evans are complete closure, yes.

Richard: The problem is this falls under State Responsibility Area (SRA), so by closing Evans you pretty much kill all traffic coming in as far as fire engines for any state responistbility requirement that we have. You're going to get about 5-10 rigs right off the initial dispatch, so by moving that road and completely closing it; you're bringing all the traffic off of Bernasconi; which there is no access for, the secondary access is on the north side. So we are going to recommend for a partial closure, because that significantly increases our response times. And there are engines coming from Nuevo, Perris, Moreno Valley, or Mead Valley, so that's your first five engines, now tack on an additional 10 minute response detour, that means we have to manually input this into our CAD system; so those detours are actually going to throw off the count of engines now coming in from San Jacinto. Moreno Valley being the larger metropolis of the suburban area, you're going to pull fire engines from that portion, when they should belong to the City of Moreno Valley. So it is going to impact us pretty significantly. END COMMENT M

COMMENT N: Now when you say 3800 cubic feet per second (cfs); that's a significant amount of water. We are not so much concerned…cause you're building these levees from the point of origin downstream, what are we going to do for downstream into the City of Perris?

Tom B: Yeah so the water will be conveyed to the Perris valley channel and down to a reservoir downstream within flood control structure that exists now.

Richard: That goes between Redlands and Perris?

Tom B: Conveyance will go to a channel in the south and ultimately to lake Elsinore. END COMMENT N

COMMENT O: Richard: Cause it crosses by San Jacinto and 4TH Street and that whole section. So what kind of notification are you going to give the fire department if we do have a release? Is it going to go through state parks? State parks to our dispatch center, or? We just want to make sure we have constant communication on any type of road closure because that is going to impact the residents of Perris, Moreno Valley, Nuevo, and Mead Valley; just because of the way our CAD system operates. END COMMENT O

COMMENT P: Is this going to be appropriate if we do put all our comments in and email them to you so I don't take up too much time?

Tom B: You bet. And obviously these are critical comments and will be considered for sure, but your input is very important so if you write it down and send it to us or give it to me tonight. You can also stay after and talk to DWR folks here. END COMMENT P

Catherine Fields (continued)

COMMENT Q: Catherine: I have another question. Do you need my name again? Catherine Felds

So my other question is about the release valves; looking at the map, it looks like to me that you have a release valve coming towards Ramona Expressway?

Tom B: Yes. It's right down here, here is the dam obviously and this is where the existing valve is.

Catherine: Ok, so when all this water, if this dam happens to liquefy…the water that's coming from the lake, that water is going to be coming toward the south? Am I right?

Tom B: This facility was built before the residential area; there is a map in the area that shows where inundation zone would be if dam were to release. Our project substantially prevents that residential area form being inundated.

Catherine: But if we happen to have an earthquake of 7.2; so when the water comes out and then the

lake liquefies the waters, the riverbed won't be able to take all that water at one time, so it may splash. And it will come over to us on that side!

Tom B: That's a fair question and I appreciate the comment on that. Again going back to full dam failure, is going to be avoided by the project being proposed. They are changing structure of dam to avoid overtopping or breaking of dam to into scenario like you are pointing out. Clearly the community below the dam needs to be concerned about that. That is why DWR is doing this remediation program and is underway. This valve, if it were to be needed, would be in case of quick drawdown. If an earthquake were to happen, that's what this valve is used for. It is designed for a controlled release.

Catherine: I understand that but I still can't see…. just like a flood in different countries and cities thatthey have big water floods, say in Louisiana. Ok the dam cannot take it all, so where did all the water go? It went into the neighborhoods and to the cities and everything. So to me, if we should have a 7.2 earthquake, this water is going to still end up splashing from it, and we will still get the effect from it. To me, they way I'm looking at it, that we should get it all the way from that release valve and that won't be able to take all that water at once. So that means that, the houses below the dam, they are in trouble.

Tom B: Well I appreciate the comment, but I would say they aren't, but the facility is again, well designed and are being remediated to ensure public safety. There are DWR folks here in the room with name tags that are responsible for operating this facility and know how it's built so there is an opportunity to talk to them about it.

Catherine: Ok I will. END COMMENT Q

Brad Scott

SoCal Fair

COMMENT R: Brad: Yeah, I have a question. At the actual dam itself, it's a smaller, more enclosed channel more or less, right? That first part there, you'd called it enclosed or a berm or?

Tom B: Over here? This one?

Brad: There, until it turns around at the Fairgrounds…

Tom B: Yeah, the blue and yellow, because it's actually a 10 foot tall earthen berm so it would simply guide surface water flow across the grassland here. The yellow is indicating a road. So there would be a road on top of it and water would surface flow across here to this point and then go channelized and south into the controlled channel.

Brad: Ok thank you. So then basically where it turns brown, it would have a wider spread?

Tom B: Well it would actually be a channel, so like a culvert or trapezoidal channel where water would be conveyed as a normal flood control channel. Whereas this, is simply a levee. END COMMENT R

COMMENT S: Brad: Ok, but you said we would still be able to use that for parking?

Tom B: There is an option, one of the alternatives evaluated in the EIR is that lake Perris fairgrounds portion on this side, could be structured such that it was dual use. And again, that is an alternative evaluated in the EIR. END COMMENT S

COMMENT T: Brad: With that point, hypothetically, so you'd do the option where so you have parking and cars and oil and what not, but then you also said it has the potential to be used as flood control channel. So you have a point source of pollution going down the channel, you have a TMDL issue here going to Elsinore, who is liable and that does ultimately becomes either an emergency or under normal conditions, flood control wise. And also, if it would become flood control, and there is that much water, you would start having issues as far as plant growth, if the EIR hits issues like that…Who

would be liable as far as land use, or maintaining, or being liable for any changes in uses there?

Tom B: That's a great question and um let's leaves it at that, but there are points in the EIR that speak to that but those are really good. Any other comments? END COMMENT T

CITY OF PERRIS

DEVELOPMENT SERVICES DEPARTMENT PLANNING DIVISION
135 NORTH D STREET, PERRIS, CA 92570-2200
TEL.: (951) 943-5003 FAX: (951) 943-8379

November 7, 2017

Tom Barnes
California Department of Water Resources
626 Wilshire Boulevard, Suite 1100
Los Angeles, CA 90017

SUBJECT: Comments on Notice to Availability of a Recirculated Draft Environmental Impact Report for the Perris Dam Emergency Release Facility Project

Dear Mr. Barnes:

COMMENT A: The City of Perris appreciates the opportunity to comment on the recirculated Draft Environmental Impact Report for the Perris Dam Emergency Release Facility project. In reviewing the document, the City supports the following phasing options as continued access will be available on Evans Road and Lake Perris Drive during construction:

1. Option A – Partial Closure at Evans Road (3-part construction)
2. Option A – Partial Closure at Lake Perris Drive
3. Option B – Temporary Paved Detour - Full Closure at Lake Perris Drive

The City does not recommend phasing Option A – Partial Closure at Evans Road (2-part Construction), as the roadway alignment is skewed.

The City of Perris looks forward to a response to these recommendations. We request that these comments be addressed prior to certifying the EIR. Please include the City on any future mailings regarding this project. If you have any questions or concerns, please do not hesitate to contact me at (951) 943-5003, extension 257. END COMMENT A

Sincerely,

Kenneth Phung Signature

Kenneth Phung
Planning Manager

Cc: Richard Belmudez, City Manager
Darren Madkin, Assistant City Manager
Clara Miramontes, Assistant City Manager
Grace Williams, Director of Economic Development and Planning
Eric Dunn, City Attorney
Habib Motlagh, City Engineer

THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA

Office of the General Manager

November 13, 2017 **Via Electronic and Regular Mail**

Tom Barnes
Environmental Science Associates
626 Wilshire Boulevard, Suite. 1100
Los Angeles, CA 90017

Dear Mr. Barnes:

Notice of Availability of a
Recirculated Draft Environmental Impact Report for the Perris Dam Emergency Release Facility

COMMENT A: The Metropolitan Water District of Southern California (Metropolitan) has reviewed the Notice of Availability of the Recirculated Draft Environmental Impact Report (RDEIR) for the Perris Dam Emergency Release Facility (Project). The California Department of Water Resources (DWR) proposes to modify Perris Dam's existing emergency release structure and construct a water conveyance facility that would reliably control a reservoir release and convey emergency flows from Lake Perris in the event of an emergency drawdown. The proposed project would be constructed partially within the Lake Perris State Recreation Area (SRA) and Lake Perris Fairground, just north of Ramona Expressway, and would connect to the Perris Valley Channel.

The proposed project includes:

1. Modifying the existing emergency release structure by removing the existing bulkhead and replacing it with one or more automated valves
2. Constructing conveyance facility improvements that would control a maximum reservoir release up 3,800 cubic feet per second and convey emergency flows from Lake Perris in the event of an emergency drawdown.
3. Constructing two levees, with a combined length of approximately 6,685 linear feet, to direct flow from the emergency release structure toward a new drainage basin and concrete weir located at the edge of the SRA and Fairground. END COMMENT A

COMMENT B: Metropolitan previously provided correspondence in October 2016 (enclosed) in response to the September 2016 DEIR stating concern with the Project's potential to affect Metropolitan's 120-inch-inside-diameter pre-stressed concrete Lake Perris Bypass Pipeline (LPBP) within the limits of this project. Contact information for the Substructures Team was provided in that letter along with a copy of Metropolitan's "Guidelines for Developments in the Area of Facilities, Fee Properties, and/or Easements of The Metropolitan Water District of Southern California." Subsequently, in response to DWR's Dam and Canals Section March 2017 submittal of

additional Project details, Metropolitan's Substructures Team advised DWR that the proposed main levee's location over the existing ground in the area of the pipeline is not acceptable. In the Substructure Team's March 29, 2017 response (enclosed), Metropolitan further advised DWR that a geotechnical analysis addressing the increased load, induced instability, and deformation of the pipeline was required and recommended a meeting to discuss the Project in detail. To date, the Substructures Team has not been contacted by DWR to meet and based on our review of the RDEIR, the Project still includes construction of the main levee across the LPBP. Accordingly, the RDEIR should include an analysis of the Project's potential environmental impacts associated with construction and operation of the main levee across the LPBP. END CO M MENT B
CO M MENT C: In addition, please revise Table 2-3 on page 2-22 in the RDEIR to indicate that in addition to excavation activities occurring near Metropolitan's LPBP that the Project's main levee would be constructed over the pipeline. END CO M MENT C

CO M MENT D: We encourage you to coordinate further with Metropolitan's Substructures Team (Ms. Shoreh Zareh at (213) 217-6534) regarding the Project's crossing of the LPBP and requirements for development near our facilities. We appreciate the opportunity to provide input to your planning process and we look forward to receiving future documentation and plans for this project. For further assistance related to this letter, please contact Mr. Alex Marks at (213) 217-7629. END CO M MENT D

Very truly yours,

Jennifer Harriger,
Team Manager, Environmental Planning Section

JH:am
Share Point\Ferris Dam Emergency Release Facility - Environmental Science Associates - Tom Barnes

Enclosures: October 20, 2016 and March 29, 2017 correspondence

Metropolitan Facilities Map

The Metropolitan Water District of Southern California
Engineering Services Group

DWR Perris Dam Emergency Facility

MWD Facilities

Feet
0 375 750 1,500

See Comment Letter 6

THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA

Office of the General Manager

October 20, 2016 **Via Electronic and Regular Mail**

California Department of Water Resources
c/o Tom Barnes, Environmental Science Associates
Perris Dam Emergency Release Facility Project
626 Wilshire Blvd., Ste. 1100
Los Angeles, CA 90017
tbarnes@esassoc.com

Dear Mr. Barnes:

Notice of Availability of
Draft Environmental Impact Report for the Perris Dam Emergency Release Facility

The Metropolitan Water District of Southern California (Metropolitan) has reviewed the Notice of Availability of the Draft Environmental Impact Report for the Perris Dam Emergency Release Facility. The California Department of Water Resources (DWR) proposes to modify Perris Dam's existing emergency release structure and construct a water conveyance facility that would reliably control a reservoir release and convey emergency flows from Lake Perris in the event of an emergency drawdown. The proposed project would be constructed partially within the Lake Perris State Recreation Area (SRA) and Lake Perris Fairground, just north of Ramona Expressway, and would connect to the Perris Valley Channel.

The proposed project includes:

1. Modifying the existing emergency release structure by removing the existing bulkhead and replacing it with one or more automated valves
2. Constructing conveyance facility improvements that would control a maximum reservoir release up 3,800 cubic feet per second (cfs) and convey emergency flows from Lake Perris in the event of an emergency drawdown.

Metropolitan is a public agency and regional water wholesaler. It is comprised of 26 member public agencies serving approximately 19 million people in portions of six counties in Southern California, including Riverside County. Metropolitan's mission is to provide its 5,200 square mile service area with adequate and reliable supplies of high-quality water to meet present and future needs in an environmentally and economically responsible way.

Upon review of the proposed emergency water conveyance system location, Metropolitan has determined that the project has the potential to impact Metropolitan's facilities including the possibility of impacting one of our feeder pipelines. Metropolitan owns and operates the 120-

inch-inside-diameter prestressed concrete Lake Perris Bypass Feeder within the limits of this project. This pipeline is a critical part of our distribution system and work in the area of the pipeline will require coordination with Metropolitan. This letter contains Metropolitan's comments to the proposed project as a potentially affected public agency.

Please include Metropolitan as a responsible agency in Table 2-3 on page 2-22. Metropolitan may need to issue an Encroachment Permit in connection with the Lake Perris Bypass Feeder.

Metropolitan must be allowed to maintain its facilities in order to maintain and repair its system. In order to avoid potential conflicts with Metropolitan's facilities and rights-of-way, we require that any design plans for any activity in the area of Metropolitan's pipelines or facilities be submitted for our review and written approval. Any future design plans associated with this project should be contingent on Metropolitan's approval of design plans for portions of the proposed project that could impact its facilities. Impacts to facilities will be dependent on the design and specific location of proposed facilities, and could include, but are not limited to, impacts due to additional loading on Metropolitan's pipeline and scour upon use of the proposed facilities.

Detailed prints of drawings of Metropolitan's pipelines and rights-of-way may be obtained by calling Metropolitan's Substructures Information Line at (213) 217-6564. To assist the applicant in preparing plans that are compatible with Metropolitan's facilities and easements, we have enclosed a copy of the "Guidelines for Developments in the Area of Facilities, Fee Properties, and/or Easements of The Metropolitan Water District of Southern California." Please note that all submitted designs or plans must clearly identify Metropolitan's facilities and rights-of-way.

We appreciate the opportunity to provide input to your planning process and we look forward to receiving future documentation and plans for this project. For further assistance, please contact Ms. Vikki Dee Bradshaw at (213) 217-6028.

Very truly yours,

Vikki Dee Bradshaw

Deirdre West, Team Manager
by Vikki Dee Bradshaw, Principal Environmental Specialist

VDB:vdb
EPT Job No. 20161003EXT

Enclosures: Metropolitan Planning Guidelines
Map


Perris Dam Emergency Release Facility
Lake Perris
Perris Blvd
Lasselle St
Evans Rd
E Rider St
Ramona Expy
Lakeview Ave
Google earth
© 2016 Google

Guidelines for Developments in the Area of Facilities, Fee Properties, and/or Easements of The Metropolitan WaterrDistrict of Southern California

1. Introduction

a. The following general guidelines should be followed for the design of proposed facilities and developments in the area of Metropolitan's facilities, fee properties, and/or easements.

b. We require that 3 copies of your tentative and final record maps, grading, paving, street improvement, landscape, storm drain, and utility plans be submitted for our review and written approval as they pertain to Metropolitan's facilities, fee properties and/or easements, prior to the commencement of any construction work.

2. Plans, Parcel and Tract Maps

The following are Metropolitan's requirements for the identification of its facilities, fee properties, and/or easements on your plans, parcel maps and tract maps:

a. Metropolitan's fee properties and/or easements and its pipelines and other facilities must be fully shown and identified as Metropolitan's on all applicable plans.

b. Metropolitan's fee properties and/or easements must be shown and identified as Metropolitan's with the official recording data on all applicable parcel and tract maps.

c. Metropolitan's fee properties and/or easements and existing survey monuments must be dimensionally tied to the parcel or tract boundaries.

d. Metropolitan's records of surveys must be referenced on the parcel and tract maps.

3. Maintenance of Access Along Metropolitan's Rights-of-Way

a. Proposed cut or fill slopes exceeding 10 percent are normally not allowed within Metropolitan's fee properties or easements. This is required to facilitate the use of construction and maintenance equipment, and provide access to its aboveground and belowground facilities.

b. We require that 16-foot-wide commercial-type driveway approaches be constructed on both sides of all streets crossing Metropolitan's rights-of-way. Openings are required in any median island. Access ramps, if necessary, must be at least 16-feet-wide. Grades of ramps are normally not allowed to exceed 10 percent. If the slope of an access ramp must exceed 10 percent due to the topography, the ramp must be paved. We require a 40-foot-long level area on the driveway approach to accessr ramps where the ramp meets the street. At Metropolitan's fee properties, we may require fences and gates.

c. The terms of Metropolitan's permanent easementr deeds normally preclude the building or maintenance of structures of any nature or kind within its easements, to ensure safety and avoid interference with operation and maintenance of Metropolitan's pipelines or other facilities. Metropolitan must have vehicular access along the easements at all times for inspection, patrolling, and for maintenance of the pipelines and other facilities on a routine basis. We require a 20-foot-wide clear zone around all above-ground facilities for this routine access. This clear zone should slope away from our facility on a grade not to exceed 2 percent. We must also have access along the easements with construction equipment. An example of this is shown on Figure 1.

d. The footings of any proposed buildings adjacent tor Metropolitan's fee properties and/or easements must not encroach into the fee property or easement or impose additional loading on Metropolitan's pipelines or other facilities therein. A typical situation is shown on Figure 2. Prints of the detail plans of the footings for any building or structure adjacent to the fee property or easement must be submitted for our review and written approval as they pertain to the pipeline or other facilities therein. Also, roof eaves of buildings adjacent to the easement or fee property must not overhang into the fee property or easement area.

e. Metropolitan's pipelines and other facilities, e.g. structures, manholes, equipment, survey monuments, etc. within its fee properties and/or easements must be protected from damage by the easement holder on Metropolitan'sr property or the property owner where Metropolitan has an easement, at no expense to Metropolitan. If the facility is a cathodic protection station it shall be located prior tor any grading or excavation. The exact location, description and way of protection shall be shown on the related plans for the easement area.

4. Easements on Metropolitan's Property

a. We encourage the use of Metropolitan's fee rights-of-way by governmental agencies for public street and utility purposes, provided that such use does not interfere with Metropolitan's use of the property, the entire width of the property is accepted into the agency's public street system and fair market value is paid for such use of the right-of-way.

b. Please contact the Director of Metropolitan's Right of Way and Land Division, telephone (213) 250-6302, concerning easements for landscaping, street, storm drain, sewer, water or other public facilities proposed within Metropolitan's fee properties. A map and legal description of the requested easements must be submitted. Also, written evidence must be submitted that shows the city or county will accept the easement for the specific purposes into its public system. The grant of the easement will be subject to Metropolitan's rights to use its land for water pipelines and related purposes to the same extent as if such grant had not been made. There will be a charge for the easement. Please note that, if entry is required on the property prior to issuance of the easement, an entry permit must be obtained. There will also be a charge for the entry permit.

5. Landscaping

Metropolitan's landscape guidelines for its fee properties and/or easements are as follows:

a. A green belt may be allowed within Metropolitan's fee property or easement.

b. All landscape plans shall show the location andr size of Metropolitan's fee property and/or easement and the location and size of Metropolitan's pipeline or other facilities therein.

c. Absolutely no trees will be allowed within 15 feetr of the centerline of Metropolitan's existing or future pipelines and facilities.

d. Deep-rooted trees are prohibited withinr Metropolitan's fee properties and/or easements. Shallow-rooted trees are the only trees allowed. The shallow-rooted trees will not be permitted any closer than 15 feet from the centerline of the pipeline, and such trees shall not be taller than 25 feet with a root spread no greater than 20 feet in diameter at maturity. Shrubs, bushes, vines, and ground cover are permitted, but larger shrubs and bushes should not be planted directly over our pipeline. Turf is acceptable. We require submittal of landscape plans for Metropolitan's prior review and written approval. (See Figure 3)t

e. The landscape plans must contain provisions forr Metropolitan's vehicular access at all times along its rights-of-way to its pipelines or facilities therein. Gates capable of accepting Metropolitan's locks are required in any fences across its rights-of-way. Also, any walks or drainage facilities across its access route must be constructed to AASHTO H-20 loading standards.

f. Rights to landscape any of Metropolitan's feer properties must be acquired from its Right of Way and Land Division. Appropriate entry permits must be obtained prior to any entry on its property. There will be a charge for any entry permit or easements required.

6. Fencing

Metropolitan requires that perimeter fencing of its fee properties and facilities be constructed of universal chain link, 6 feet in height and topped with 3 strands of barbed wire angled upward and outward at a 45 degree angle or an approved equal for a total fence height of 7 feet. Suitable substitute fencing may be considered by Metropolitan. (Please see Figure 5 for details)t

7. Utilities in Metropolitan's Fee Properties and/or Easements or Adjacent to Its Pipeline in Public Streets

Metropolitan's policy for the alinement of utilities permitted within its fee properties and/or easements and street rights-of-way is as follows:

a. Permanent structures, including catch basins, manholes, power poles, telephone riser boxes, etc., shall not be located within its fee properties and/or easements.

b. We request that permanent utility structuresr within public streets, in which Metropolitan's facilities are constructed under the Metropolitan Water District Act, be placed as far from our pipeline as possible, but not closer than 5 feet from the outside of our pipeline.

c. The installation of utilities over or underr Metropolitan's pipeline(s) must be in accordance with the requirements shown on the enclosed prints of Drawings Nos. C-11632 and C-9547. Whenever possible we request a minimum of one foot clearance between Metropolitan's pipe and your facility. Temporary support of Metropolitan's pipe may also be required at undercrossings of its pipe in an open trench. The temporary support plans must be reviewed and approved by Metropolitan.

d. Lateral utility crossings of Metropolitan's pipelines must be as perpendicular to its pipeline alinement as practical. Prior to any excavation our pipeline shall be located manually and any excavation within two feet of our pipeline must be done by hand. This shall be noted on the appropriate drawings.

e. Utilities constructed longitudinally withinr Metropolitan's rights-of-way must be located outside the theoretical trench prism for uncovering its pipeline and must be located parallel to and as close to its rights-of-way lines as practical.

f. When piping is jacked or installed in jacked casing or tunnel under Metropolitan's pipe, there must be at least two feet of vertical clearance between the bottom of Metropolitan's pipe and the top of the jacked pipe, jacked casing or tunnel. We also require that detail drawings of the shoring for the jacking or tunneling pits be submitted for our review and approval. Provisions must be made to grout any voids around the exterior of the jacked pipe, jacked casing or tunnel. If the piping is installed in a jacked casing or tunnel the annular space between the piping and the jacked casing or tunnel must be filled with grout.

g. Overhead electrical and telephone line requirements:

1) Conductor clearances are to conform to the California State Public Utilities Commission, General Order 95, for Overhead Electrical Line Construction or at a greater clearance if required by Metropolitan. Under no circumstances shall clearance be less than 35 feet.

2) A marker must be attached to the power pole showing the ground clearance and line voltage, to help prevent damage to your facilities during maintenance or other work being done in the area.

3) Line clearance over Metropolitan's fee properties and/or easements shall be shown on the drawing to indicate the lowest point of the line under the most adverse conditions including consideration of sag, wind load, temperature change, and support type. We require that overhead lines be located at least 30 feet laterally away from all above-ground structures on the pipelines.

4) When underground electrical conduits, 120 volts or greater, are installed within Metropolitan's fee property and/or easement, the conduits must be incased in a minimum of three inches of red concrete. Where possible, above ground warning signs must also be placed at the right-of-way lines where the conduits enter and exit the right-of-way.

h. The construction of sewerlines in Metropolitan's fee properties and/or easements must conform to the California Department of Health Services Criteria for the Separation of Water Mains and Sanitary Services and the local City or County Health Code Ordinance as it relates to installation of sewers in the vicinity of pressure waterlines. The construction of sewerlines should also conform to these standards in street rights-of- way.

i. Cross sections shall be provided for all pipeline crossings showing Metropolitan's fee property and/or easement limits and the location of our pipeline(s). The exact locations of the crossing pipelines and their elevations shall be marked on as-built drawings for our information.

j. Potholing of Metropolitan's pipeline is required if the vertical clearance between a utility and Metropolitan's pipeline is indicated on the plan to be one foot or less. If the indicated clearance is between one and two feet, potholing is suggested. Metropolitan will provide a representative to assists others in locating and identifying its pipeline. Two-working days notice is requested.

k. Adequate shoring and bracing is required for ther full depth of the trench when the excavation encroaches within the zone shown on Figure 4.

1. The location of utilities within Metropolitan'sr fee property and/or easement shall be plainly marked to help prevent damage during maintenance or other work done in the area. Detectable tape over buried utilities should be placed a minimum of 12 inches above the utility and shall conform to the following requirements:

1) Water pipeline: A two-inch blue warning tape shall be imprinted with:

"CAUTION BURIED WATER PIPELINE"

2) Gas, oil, or chemical pipeline: Ar two-inch yellow warning tape shall be imprinted with:

"CAUTION BURIED PIPELINE"

3) Sewer or storm drain pipeline: Ar two-inch green warning tape shall be imprinted with:

"CAUTION BURIED PIPELINE"

4) Electric, street lighting, or trafficr signals conduit: A two-inch red warning tape shall be imprinted with:

"CAUTION BURIED CONDUIT"

5) Telephone, or television conduit: Ar two-inch orange warning tape shall be imprinted with:

"CAUTION BURIED CONDUIT"

m. Cathodic Protection requirements:r

1) If there is a cathodic protection stationr for Metropolitan's pipeline in the area of the proposed work, it shall be located prior to any grading or excavation. The exact location, description and manner of protection shall be shown on all applicable plans. Please contact Metropolitan's Corrosion Engineering Section, located at Metropolitan's F. E. Weymouth Softening and Filtration Plant, 700 North Moreno Avenue, La Verne, California 91750, telephone (714) 593-7474, for the locations of Metropolitan's cathodicr protection stations.

2) If an induced-current cathodic protection system is to be installed on any pipeline crossing Metropolitan's pipeline, please contact Mr. Wayne E. Risner at (714) 593-7474 or (213) 250-5085. He will review the proposed system and determine if any conflicts will arise with the existing cathodic protection systems installed by Metropolitan.

3) Within Metropolitan's rights-of-way,rtpipelines and carrier pipes (casings) shall be coatedtwith an approved protective coating to conform totMetropolitan's requirements, and shall be maintained inta neat and orderly condition as directed by Metropolitan.tThe application and monitoring of cathodic protection on the pipeline and casing shall conform to Title 49 of the Code of Federal Regulations, Part 195.

4) If a steel carrier pipe (casing) is used:r

(a) Cathodic protection shall be provided by use of a sacrificial magnesium anode (a sketch showing the cathodic protection details can be provided for the designers information).

(b) The steel carrier pipe shall bertprotected with a coal tar enamel coating inside and out in accordance with AWWA C203 specification.

n. All trenches shall be excavated to comply with ther CAL/OSHA Construction Safety Orders, Article 6, beginning with Sections 1538 through 1547. Trench backfill shall be placed in 8-inch lifts and shall be compacted to 95 percent relative compaction (ASTM D698) across roadways and through protective dikes. Trench backfill elsewhere will be compacted to 90 percent relative compaction (ASTM D698).

o. Control cables connected with the operation ofr Metropolitan's system are buried within streets, its fee properties and/or easements. The locations and elevations of these cables shall be shown on the drawings. The drawings shall note that prior to any excavation in the area, the control cables shall be located and measures shall be taken by the contractor to protect the cables in place.

p. Metropolitan is a member of Underground Servicer Alert (USA). The contractor (excavator) shall contact USA at 1-800-422-4133 (Southern California) at least 48 hours prior to starting any excavation work. The contractor will be liable for any damage to Metropolitan's facilities as a result of the construction.

8. Paramount Rightr

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

9. Modification of Metropolitan's Facilitiesr

When a manhole or other of Metropolitan's facilities must be modified to accommodate your construction or reconstruction, Metropolitan will modify the facilities with its forces. This should be noted on the construction plans. The estimated cost to perform this modification will be given to you and we will require a deposit for this amount before the work is performed. Once the deposit is received, we will schedule the work. Our forces will coordinate the work with your contractor. Our final billing will be based on actual cost incurred, and will include materials, construction, engineering plan review, inspection, and administrative overhead charges calculated in accordance with Metropolitan's standard accounting practices. If the cost is less than the deposit, a refund will be made; however, if the cost exceeds the deposit, an invoice will be forwarded for payment of the additional amount.

10. Drainager

a. Residential or commercial development typicallyrtincreases and concentrates the peak storm water runoff as well as the total yearly storm runoff from an area, thereby increasing the requirements for storm drain facilities downstream of the development. Also, throughout the year water from landscape irrigation, car washing, and other outdoor domestic water uses flows into the storm drainage system resulting in weed abatement, insect infestation, obstructed access and other problems. Therefore, it is Metropolitan's usual practice not to approve plans that show discharge of drainage from developments onto its fee properties and/or easements.

b. If water must be carried across or discharged ontor Metropolitan's fee properties and/or easements, Metropolitan will insist that plans for development provide that it be carried by closed conduit or lined open channel approved in writing by Metropolitan. Also the drainage facilities must be maintained by others, e.g., city, county, homeowners association, etc. If the development proposes changes to existing drainage features, then the developer shall make provisions to provide for replacement and these changes must be approved by Metropolitan in writing.

11. Construction Coordination

During construction, Metropolitan's field representative will make periodic inspections. We request that a stipulation be added to the plans or specifications for notification of Mr.rt t + of Metropolitan's Operations Services Branch, telephone (213) 250- , at least two working days prior to any work in the vicinity of our facilities.

12. Pipeline Loading Restrictionsr

a. Metropolitan's pipelines and conduits vary inr structural strength, and some are not adequate for AASHTO H-20 loading. Therefore, specific loads over the specific sections of pipe or conduit must be reviewed and approved by Metropolitan. However, Metropolitan's pipelines are typically adequate for AASHTO H-20 loading provided that the cover over the pipeline is not less than four feet or the cover is not substantially increased. If the temporary cover over the pipeline during construction is between three and four feet, equipment must restricted to that which

imposes loads no greater than AASHTO H-10. If the cover is between two and three feet, equipment must be restricted to that of a Caterpillar D-4 tract-type tractor. If the cover is less than two feet, only hand equipment may be used. Also, if the contractor plans to use any equipment over Metropolitan's pipeline which will impose loads greater than AASHTO H-20, it will be necessary to submit the specifications of such equipment for our review and approval at least one week prior to its use. More restrictive requirements may apply to the loading guideline over the San Diego Pipelines 1 and 2, portions of the Orange County Feeder, and the Colorado River Aqueduct. Please contact us for loading restrictions on all of Metropolitan's pipelines and conduits.

b. The existing cover over the pipeline shall ber maintained unless Metropolitan determines that proposed changes do not pose a hazard to the integrity of the pipeline or an impediment to its maintenance.

13. Blasting

a. At least 20 days prior to the start of any drilling for rock excavation blasting, or any blasting, in the vicinity of Metropolitan's facilities, a two-part preliminary conceptual plan shall be submitted to Metropolitan as follows:

b. Part 1 of the conceptual plan shall include ar complete summary of proposed transportation, handling, storage, and use of explosions.

c. Part 2 shall include the proposed general conceptr for blasting, including controlled blasting techniques and controls of noise, fly rock, airblast, and ground vibration.

14. CEQA Requirementsr

a. When Environmental Documents Have Not Beenr Prepared

1) Regulations implementing the Californiar Environmental Quality Act (CEQA) require that Metropolitan have an opportunity to consult with the agency or consultants preparing any environmental documentation. We are required to review and consider the environmental effects of the project as shown in the Negative Declaration or Environmental Impact Report (EIR) prepared for your project before committing Metropolitan to approve your request.

2) In order to ensure compliance with ther regulations implementing CEQA where Metropolitan is not the Lead Agency, the following minimum procedures to ensure compliance with the Act have been established:

a) Metropolitan shall be timely advised ofany determination that a Categorical Exemption applies to the project. The Lead Agency is to advise Metropolitan that it and other agencies participating in the project have complied with the requirements of CEQA prior to Metropolitan's participation.

b) Metropolitan is to be consulted during the preparation of the Negative Declaration or EIR.

c) Metropolitan is to review and submit anyr necessary comments on the Negative Declaration or draft EIR.

d) Metropolitan is to be indemnified forrtany costs or liability arising out of anytviolation of any laws or regulations including buttnot limited to the California Environmental Quality Act and its implementing regulations.

b. When Environmental Documents Have Been Prepared

If environmental documents have been prepared for your project, please furnish us a copy for our review and files in a timely manner so that we may have sufficient time to review and comment. The following steps must also be accomplished:

1) The Lead Agency is to advise Metropolitanr that it and other agencies participating in the project have complied with the requirements of CEQA prior to Metropolitan's participation.

2) You must agree to indemnify Metropolitan, itsr officers, engineers, and agents for any costs or liability arising out of any violation of any laws or regulations including but not limited to the California Environmental Quality Act and its implementing regulations.

15. Metropolitan's Plan-Review Cost

a. An engineering review of your proposed and development of the preparation of a letter response

giving Metropolitan's comments, requirements and/or approval that will require 8 man-hours or less of effort is typically performed at no cost to the developer, unless a facility must be modified where Metropolitan has superior rights. If an engineering review and letter response requires more than 8 man-hours of effort by Metropolitan to determine if the proposed facility or development is compatible with its facilities, or if modifications to Metropolitan's manhole(s) or other facilities will be required, then all of Metropolitan's costs associated with the project must be paid by the developer, unless the developer has superior rights.

b. A deposit of funds will be required from ther developer before Metropolitan can begin its detailed engineering plan review that will exceed 8 hours. The amount of the required deposit will be determined after a cursory review of the plans for the proposed development.

c. Metropolitan's final billing will be based onr actual cost incurred, and will include engineering plan review, inspection, materials, construction, and administrative overhead charges calculated in accordance with Metropolitan's standard accounting practices. If the cost is less than the deposit, a refund will be made; however, if the cost exceeds the deposit, an invoice will be forwarded for payment of the additional amount. Additional deposits may be required if the cost of Metropolitan's review exceeds the amount of the initial deposit.

16. Cautionr

We advise you that Metropolitan's plan reviews and responses are based upon information available to Metropolitan which was prepared by or on behalf of Metropolitan for general record purposes only. Such information may not be sufficiently detailed or accurate for your purposes. No warranty of any kind, either express or implied, is attached to the information therein conveyed as to its accuracy, and no inference should be drawn from Metropolitan's failure to comment on any aspect of your project. You are therefore cautioned to make such surveys and other field investigations as you may deem prudent to assure yourself that any plans for your project are correct.

17. Additional Informationr

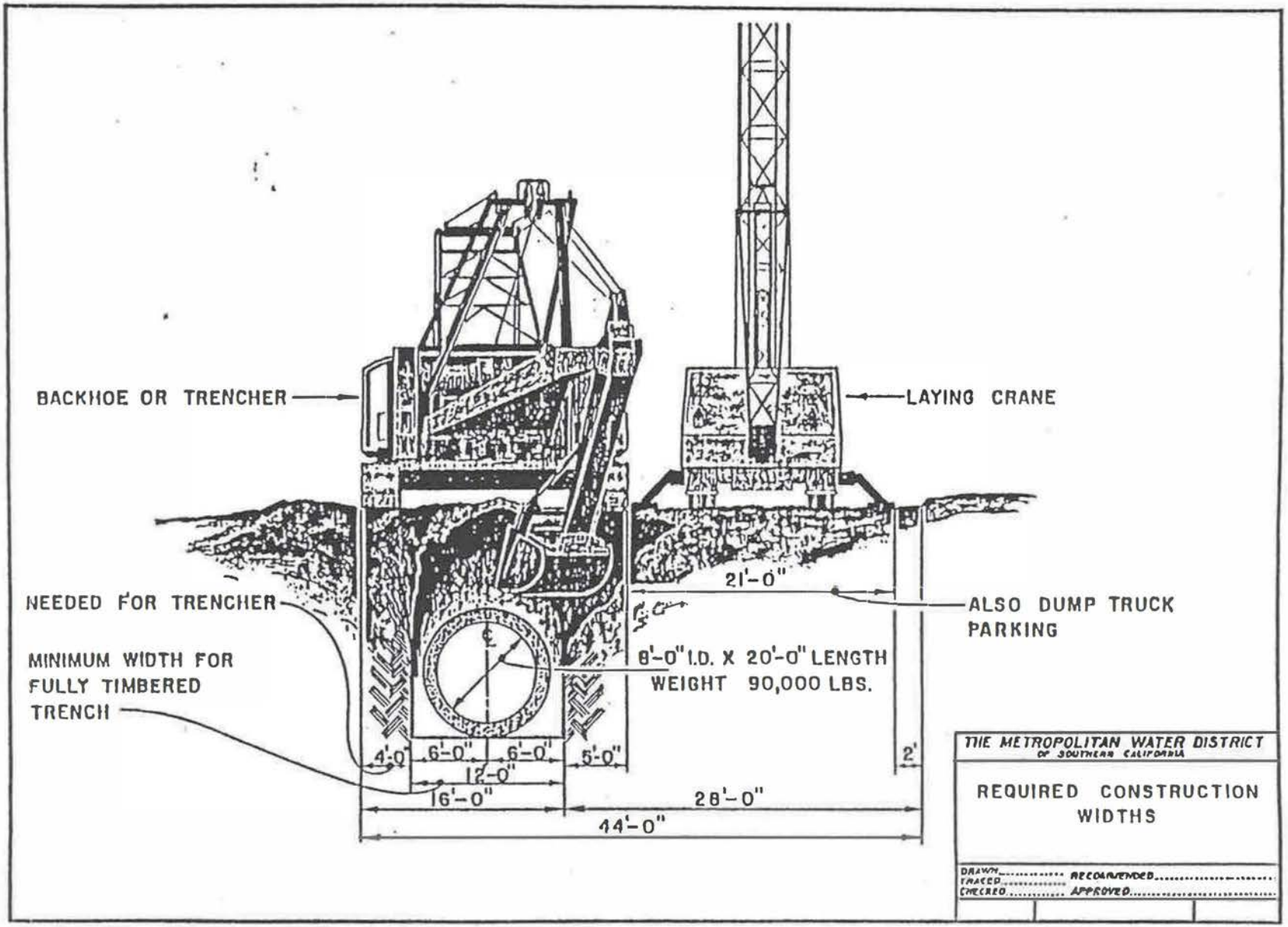
Should you require additional information, please contact:

Civil Engineering Substructures Section
Metropolitan Water District
of Southern California
P.O. Box 54153
Los Angeles, California 90054-0153
(213)r 217-6000r

JEH/MRW/lk

Rev. January 22, 1989

Encl.

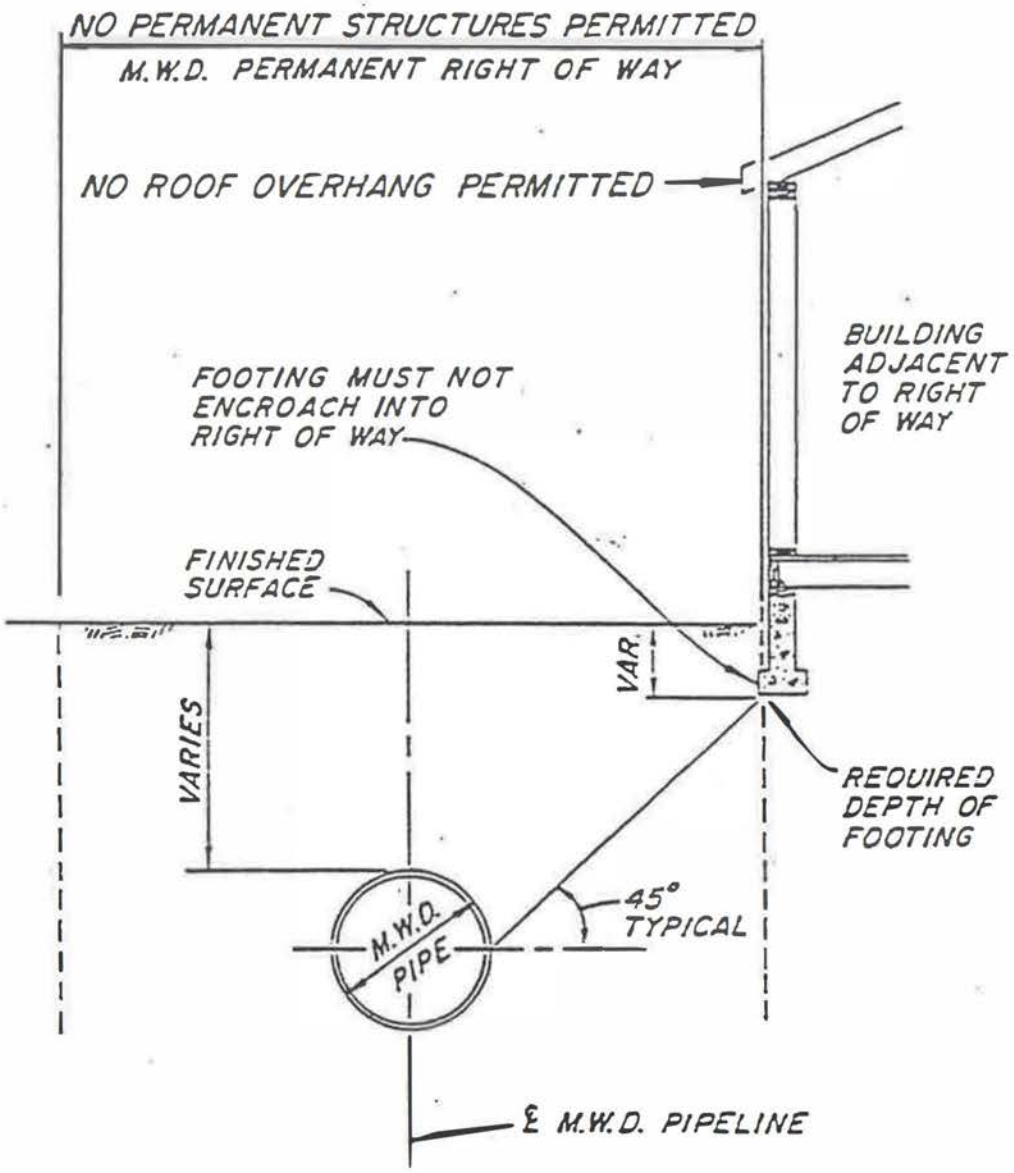


THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA

REQUIRED CONSTRUCTION WIDTHS

DRAWN ..... RECOMMENDED .....
TRACED .....
CHECKED ..... APPROVED .....

FIGURE 1



NOTE: M.W.D. PIPELINE SIZE, DEPTH, LOCATION AND WIDTH OF PERMANENT RIGHT OF WAY VARIES.

THE METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

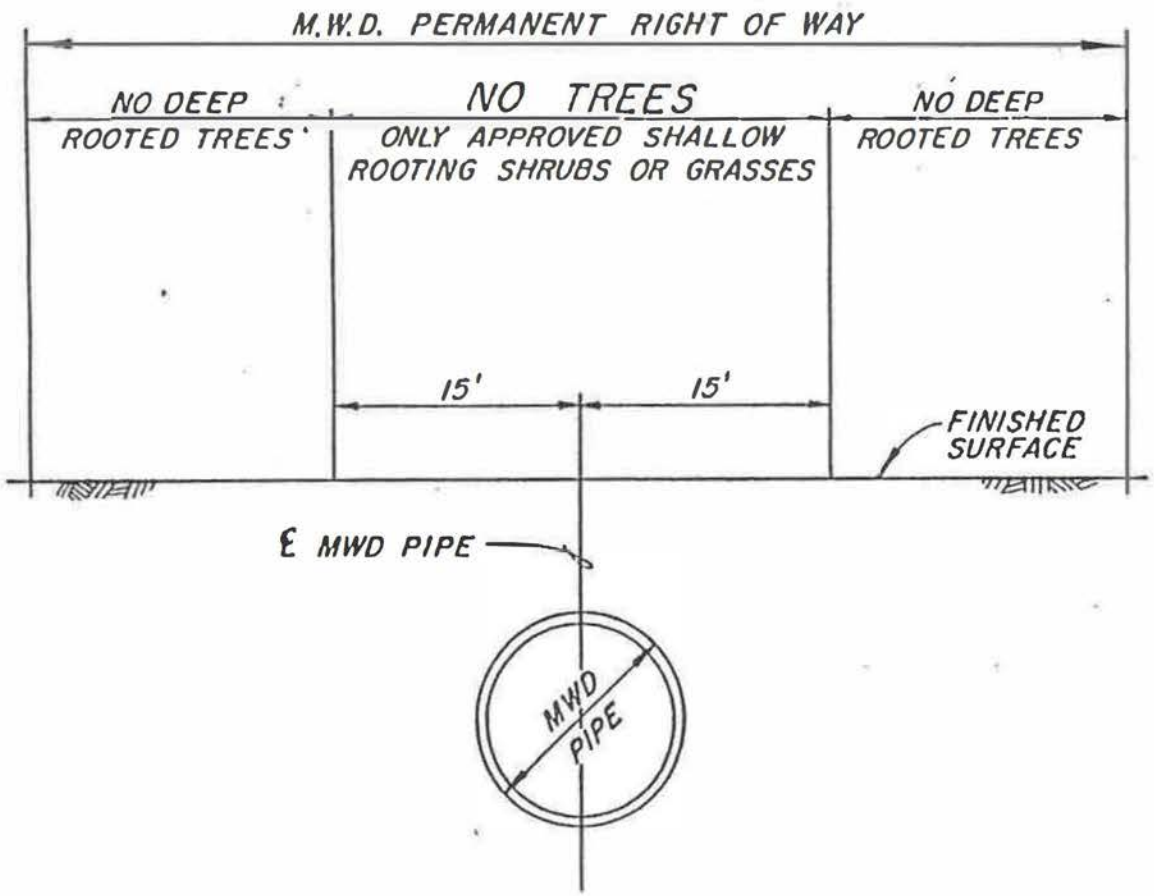
REQUIREMENTS FOR BUILDINGS AND FOOTINGS ADJACENT TO M.W.D. RIGHT OF WAY

DRAWN _____ RECOMMENDED _____
TRACED _____
CHECKED _____ APPROVED _____

FIGURE 2

FORM NO. 88 0 1000 11 67 P.O. 67-8214

11-67 BIETTER/CH-POST CLEARPRINT 1025



THE METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

LANDSCAPE GUIDELINES FOR M.W.D. RIGHT OF WAY

DRAWN..... RECOMMENDED.....
TRACED.....
CHECKED..... APPROVED.....

FIGURE 3

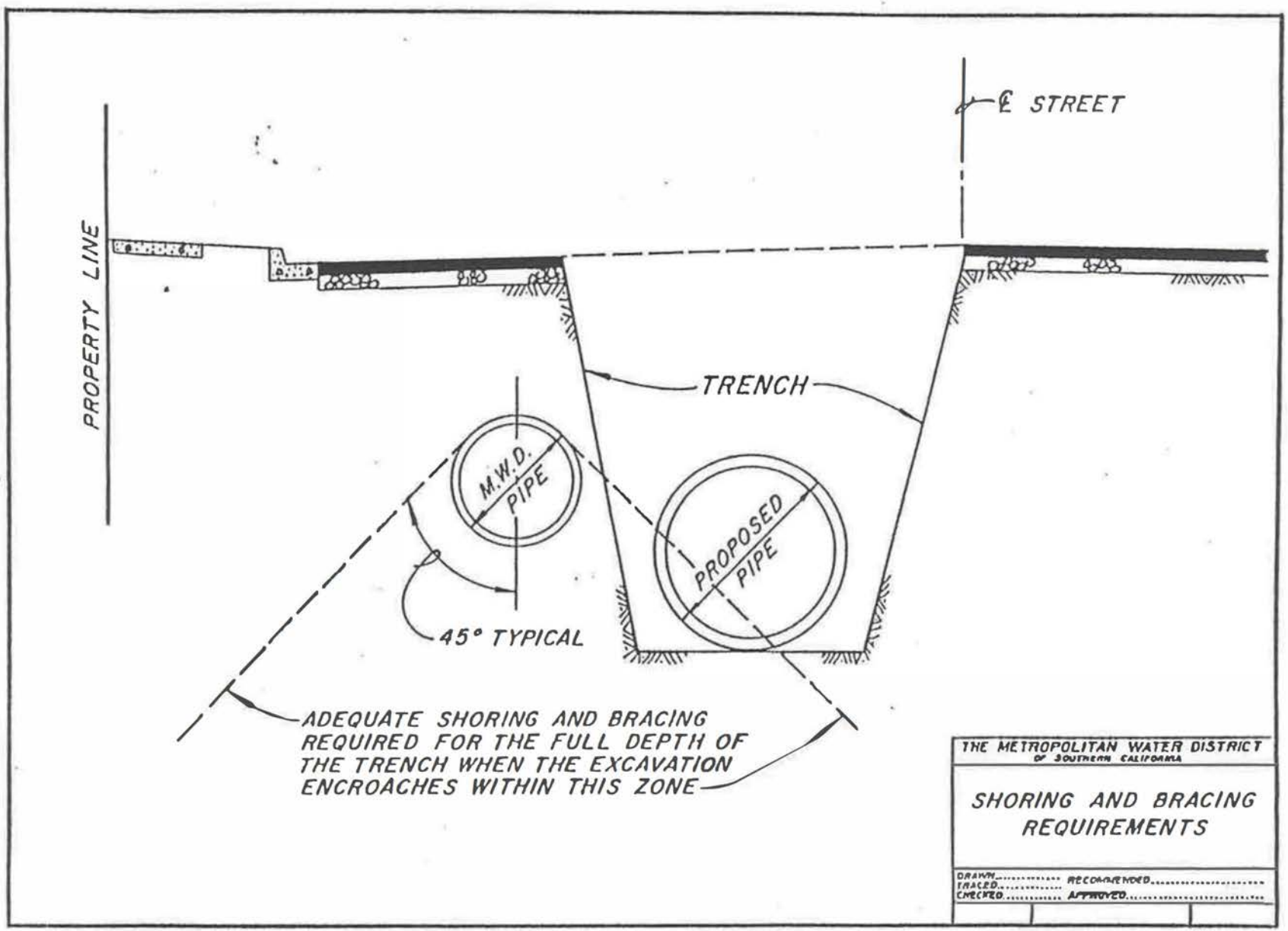
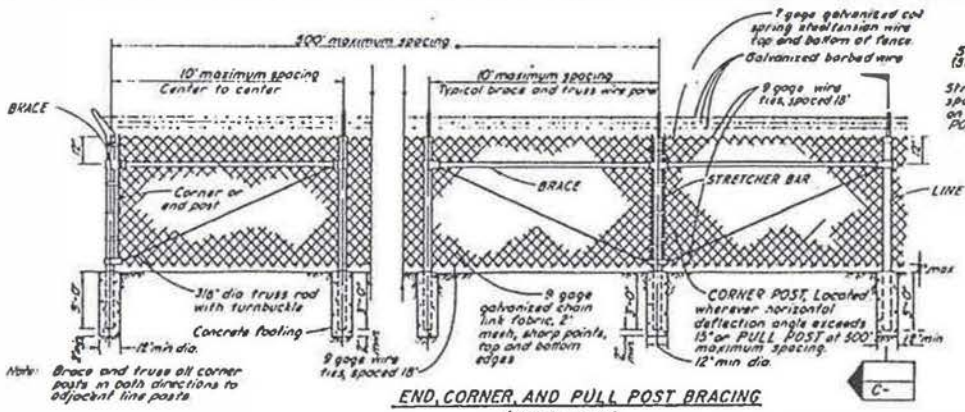
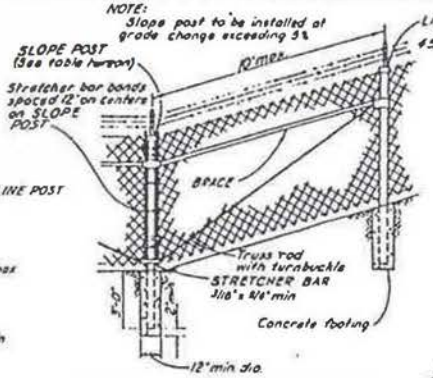


FIGURE 4

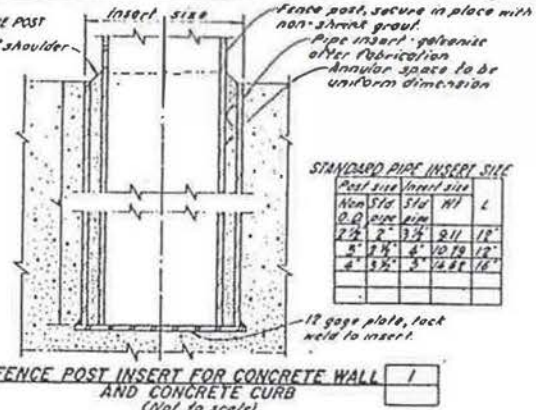
SPECIFICATIONS NO. SHEET NO.



END, CORNER, AND PULL POST BRACING
(Not to scale)



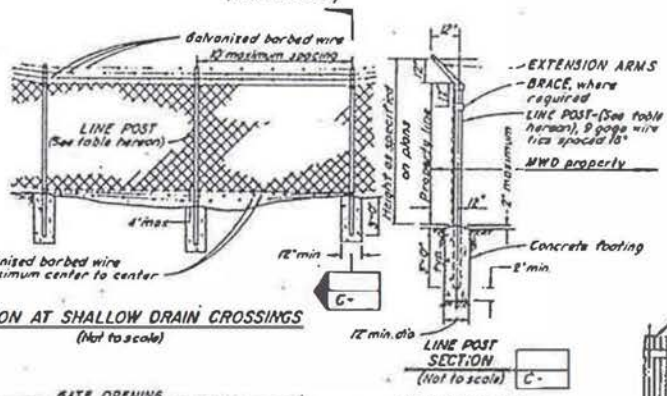
TYPICAL FENCE ON SLOPE
(Not to scale)



STANDARD PIPE INSERT SIZE

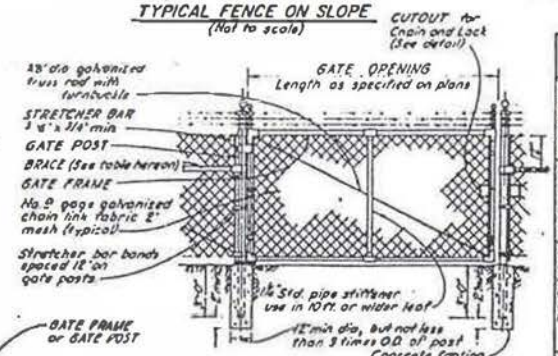
Post size Nom O.D	Insert size Std pipe	Std size	Wt	L
2 1/2"	2"	3 3/4"	9.11	12"
3"	2 1/2"	4"	10.79	12"
4"	3 1/2"	5"	14.88	12"

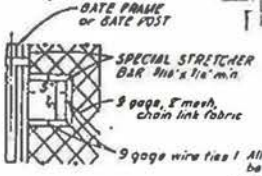
FENCE POST INSERT FOR CONCRETE WALL AND CONCRETE CURB
(Not to scale)



ELEVATION AT SHALLOW DRAIN CROSSINGS
(Not to scale)

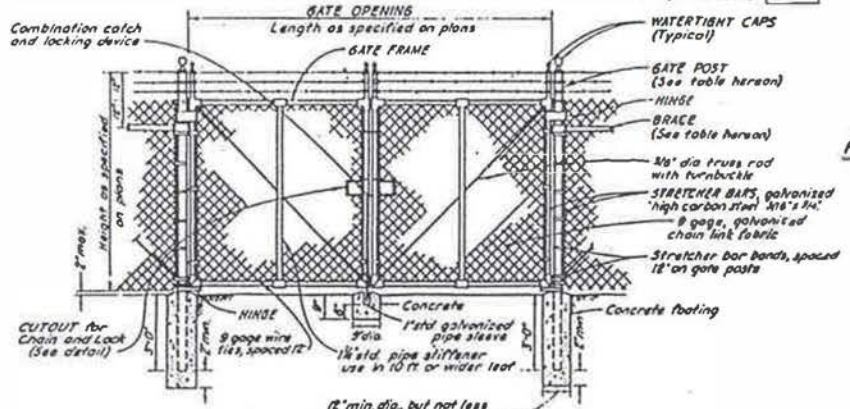
LINE POST SECTION
(Not to scale) C-





SINGLE SWING GATE DETAIL
(Not to scale)

Use	Type	Nominal Size (inches)	Actual O.D (inches)	Weight per foot (Pounds)
End, corner, slope, pull and gate posts (for single gates 6 feet or less in width and double gates 12 feet or less in width) for chain link fabric 72 inches or higher	Pipe	2 1/2	2.875	3.79
End, corner, slope, pull and gate posts (for single gates 6 feet or less in width and double gates 12 feet or less in width) for chain link fabric less than 72 inches height	Pipe	2	2.375	3.65
Gate posts for single swing gates over 6 feet but not over 13 feet in width and double swing gates over 12 feet but not over 26 feet in width.	Pipe	3 1/2	4.000	9.11
Gate posts for single swing gates over 13 feet but not over 18 feet in width and double swing gates over 26 feet but not over 36 feet in width.	Pipe	6	6.625	18.97
Gate posts for single swing gates over 18 feet in width and double swing gates over 36 feet in width	Pipe	8	8.625	24.70
Line posts for chain link fabric 72 inches or higher	Pipe H-Section	2 2 1/2 x 1 7/8	2.375	3.65 4.10
Line posts for chain link fabric less than 72 inches in height	Pipe H-Section	1 1/2 1 1/2 x 1 5/8	1.900	2.72 2.80
Braces	Pipe H-Section	1 1/2 1 1/2 x 1 5/8	1.660	2.27 2.80
Frame for gates	Pipe	1 1/2	1.900	2.72
Stiffeners for gates	Pipe	1 1/4	1.660	2.27



DOUBLE SWING GATE DETAIL
(Not to scale)

DETAIL OF CUTOUT FOR CHAIN AND LOCK
(Not to scale)

GENERAL NOTES

1 All ferrous parts and materials shall be galvanized after fabrication

2 Adjustable tighteners shall be turnbuckle or equivalent, having minimum 6" take-up

3 Extension arms for barbed wire shall be steel, malleable iron or wrought iron and shall be attached to the top of the post with a 5/16 inch round head rivet. The extension arms shall carry three wires each at approximately 5 inch centers in a plane approximately 45° from the vertical.

4 All gate hinges shall be heavy duty malleable iron or steel, industrial service type, 270 degree swing, of approved quality and design.

5 Secure cap to post with 1/4 inch round head rivet

THE METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA
DISTRIBUTION SYSTEM

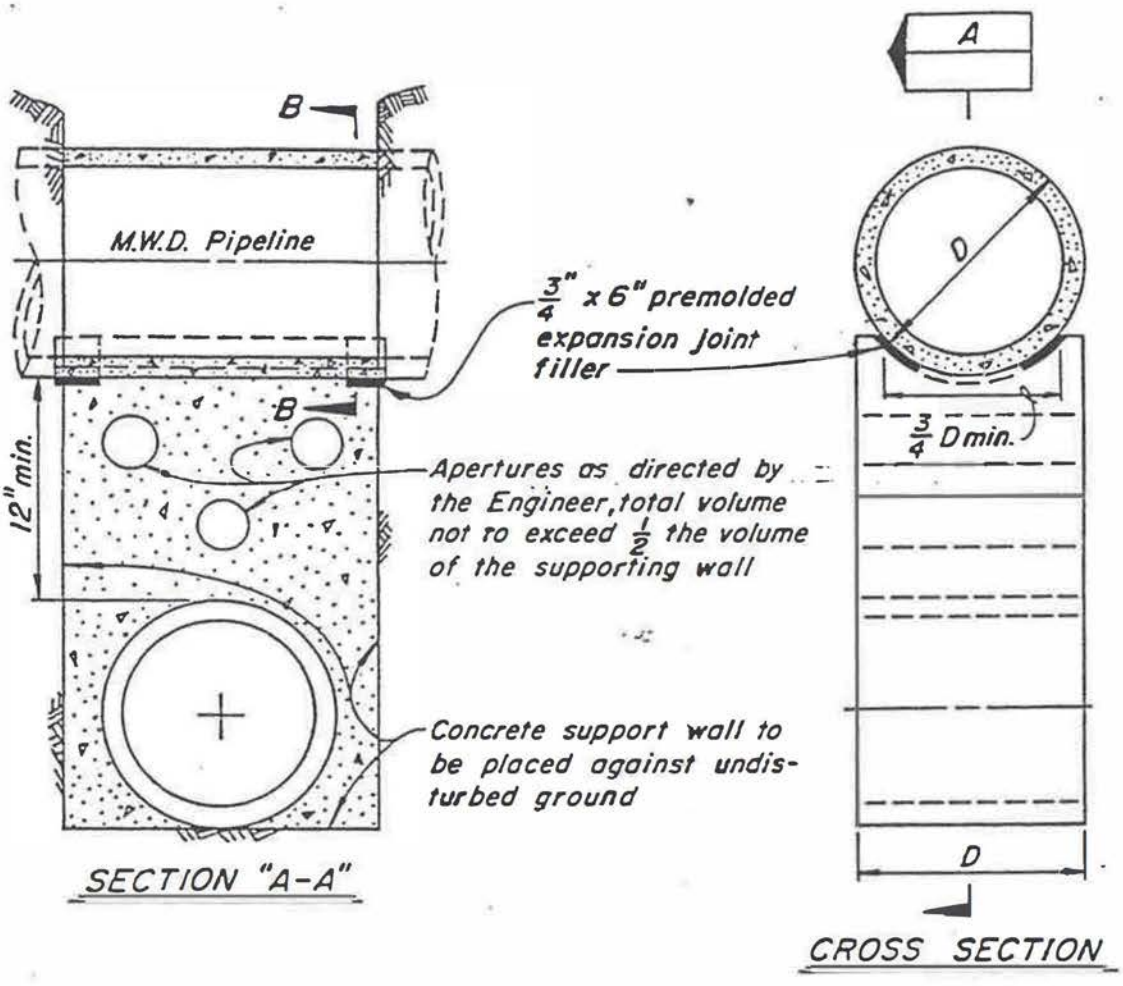
CHAIN LINK FENCE DETAILS

DESIGNED
DRAWN
CHECKED
RECOMMENDED
APPROVED
WORK ORDER NO.
LOS ANGELES

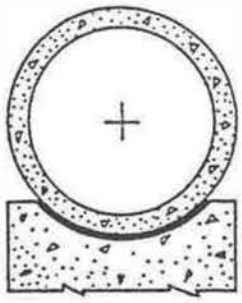
NO.	DATE	BY	CHK.	CKD.	REVISION	REC.	APP.

ORIGINAL RELEASE	REVISION COORDINATION CHECK: MECH	STRUCT	ELEC	CIVIL	SPECS	DATE
	INTERSECTIONAL COORDINATION CHECK					

FIGURE 5



1. Supporting wall shall have a firm bearing on the subgrade and against the side of the excavation.
2. Premolded expansion joint filler per ASTM D-1751-73 to be used in support for steel pipe only.
3. If trench width is 4 feet or greater, measured along centerline of M.W.D. pipe, concrete support must be constructed.
4. If trench width is less than 4 feet, clean sand backfill, compacted to 90% density in accordance with the provisions of ASTM Standard D-1557-70 may be used in lieu of the concrete support wall.



SECTION "B-B"

THE METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

TYPICAL SUPPORT FOR M.W.D. PIPELINE

DESIGNED _____ DATE _____
TRACED _____
CHECKED _____ APPROVED _____

C-9547

THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA

Office of the General Manager

MWD Perris Bypass Pipeline
Sta 2060+00 to 2117+00
Substr. Job No. 4050-10-001

March 29, 2017

Mr. Freydoune Seddick, P.E.
Dam and Canals Section
Department of Water Resources
1416 Ninth Street
P.O. Box 942836
Sacramento, CA 94236-0001

Dear Mr. Seddick:

Lake Perris Emergency Release Facility

Thank you for your email dated March 7, 2017, submitting a copy of the utility map (Sheet 3 of 4), typical containment levee section, Inundation plot, Perris Dam Emergency Release Facility (ERF) geology exploration location map, preferred project alternative – levees and dual use channel documents for the proposed water conveyance facility that will direct emergency release waters from Lake Perris Outlet to the Perris Valley Channel (PVC) in the city of Perris. In addition, we received a print of our Drawing B-65656 showing the location of the levee crossing our pipeline.

The proposed preferred alternative utilizes a set of levees and approach pad to convey release water from Lake Perris Outlet to a weir where water will be channelized through the fairgrounds, and then tie into a PVC. The main levee (approximately 5900 feet long) will cross Metropolitan's 120-inch-inside diameter prestressed concrete Lake Perris Bypass Pipeline and its 8-inch PVC discharge pipe between Stations 2075+00 to 2076+00. The main levee will be 10 feet high and approximately 86-feet wide, as shown on the submitted typical levee section.

The proposal to construct a 10 feet high levee over the existing ground in the area of our pipeline is not acceptable, since our prestressed concrete pipeline is designed for a ground cover of 10

fect at the crossing location. As shown on our Drawing B- 65656, our pipeline is already at this limit and cannot accommodate an additional 10 foot of cover.

The load from a 10-foot tall levee and the weight from water inundation (dead load) over our pipeline will require protection or encasement of Metropolitan's pipeline. The protection structure could be a buried bridge which carries and spreads the additional loads beneath the pipeline.

A geotechnical analysis addressing the increased load, induced instability and induced deformation (settlement, rebound and lateral displacement) of our pipeline will be required. Please refer to Sections 3 and 4.1 of our Geotechnical Guidelines, copy attached.

We recommend having a meeting to discuss in detail the impact of the proposed project and our requirements for the protection of our facilities.

For any further correspondence with Metropolitan relating to this project, please make reference to the Substructures Job Number 4050-10-001. 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/dl
DOC# 4050-10-001a

Enclosure

bcc: M. Beikae
A. Brainard
S. Zareh
Substructures File

GEOTECHNICAL GUIDELINES

Revision Date: 03/03/2014

1. Introduction

Metropolitan conveyance system, as defined below, is very sensitive to deformation and loading. Thus, its protection is of paramount importance to Metropolitan and any projects that occur in the vicinity or over it require a high level of technical analysis and review to ensure there are no adverse impacts to it compromising the continuity and reliability of the Metropolitan conveyance system. As such, the purpose of Geotechnical Guidelines is to provide a brief outline of the work to be performed to evaluate and determine the adverse impacts, if any, of various stages of project development on the structural integrity of the conveyance system. The guidelines require performing geotechnical/geological exploration and engineering analyses, providing geotechnical recommendations, and producing reports. Please note that these minimum requirements set forth in the guidelines cannot be expected to cover all possible conditions encountered for proposed developments. Any adverse impacts to the Metropolitan conveyance system, as determined by Metropolitan, will need to be mitigated to the satisfaction of Metropolitan.

2. Definition

Metropolitan's tunnels, canals, pipes, siphons, cut-and-cover conduits, and their appurtenant structures (such as transitional structures, manholes, etc.) are called herein as "the conveyance system."

3. Geotechnical Exploration and Testing

3.1 Sufficient and complete geotechnical exploration and testing shall be performed to adequately and fully characterize the subsurface ground and groundwater conditions beneath and adjacent to the conveyance system, and to provide suitable geotechnical information and data to substantiate parameters used and analysis/calculations performed, evaluate potential impacts and determine the adverse effects of the development on the impacted reach of the conveyance system.

3.2 The type of subsurface exploration, testing, and sampling methods utilized should be appropriate for the ground and groundwater conditions. Acceptable exploration methods would include hollow-stem auger, rotary wash, air rotary, or bucket-auger drilling, Cone Penetration Testing (CPT), and shallow trenches

and test pits. Sampling methods could include Standard Penetration Tests (SPT), ring samplers, continuous core, and Shelby tube.

3.3 The number and spacing of explorations shall be as needed to provide the specified subsurface characterization as determined by the complexity and variability of the geotechnical site conditions, or needs of the required geotechnical analysis to be performed. Closely spaced explorations may be necessary if highly variable subsurface conditions are expected or encountered along the impacted reach of the conveyance system affected by the proposed development. Closely spaced explorations may also be needed if subsequent information is needed to complete or perform analyses.

3.4 Exploration shall be drilled/excavated as close as possible to the conveyance system impacted by the proposed development, but no closer than 10 feet to the outside faces of the conveyance system. All exploration methods and locations shall be staked in the field and approved by Metropolitan prior to mobilizing of field exploration equipment.

3.5 Exploration shall be drilled to a depth of at least 5 feet into bedrock or formational material in order to provide adequate information regarding subsurface stratigraphy below the bottom of the conveyance system. In areas of deep underlying bedrock or formational material, the minimum depth of exploration shall be at least 50 feet below the bottom elevation of the conveyance system.

3.6 Disturbed and relatively undisturbed samples shall be collected at a maximum of 5-foot intervals using sampling equipment compatible with the subsurface conditions encountered and the sample types needed for laboratory analyses. Sufficient samples shall be collected to fully and adequately characterize the subsurface conditions and provide enough samples to perform laboratory testing and substantiate soil properties and geotechnical design parameters. Acceptable sampler types would include, but are not limited to, SPT sampler, modified California ring sampler, Shelby tube sampler, Pitcher core sampler, and core barrel. Sampling intervals shall be reduced if more closely spaced data is required for evaluation. In addition to drive samples, bulk samples shall be collected at selected depths for index property testing. A minimum of one bulk sample shall be taken from every subsurface exploration, but consideration should be given to collecting additional samples as appropriate.

3.7 Groundwater depth measurements shall be taken and recorded when groundwater is encountered within subsurface explorations. Explorations shall be left open as required to allow the groundwater level to stabilize. The depth to groundwater shall be measured again, after the groundwater level in the

exploration has stabilized. Both groundwater levels and the time and date of the measurements shall be noted on the exploration logs. For construction or developments that will require dewatering, consideration must be given to the installation of groundwater monitoring wells.

3.8 Geophysical testing methods such as seismic refraction surveys and down-hole (up-hole) tests may be used to supplement exploratory borings and test pits to characterize subsurface conditions, especially to identify the depth to bedrock or formational material. Geophysical testing methods would also be appropriate if highly variable subsurface conditions are anticipated or to better define the subsurface conditions along the impacted reach of the conveyance system.

3.9 Laboratory testing shall be performed on samples collected during the field explorations. The number and frequency of tests performed shall be sufficient to characterize the properties of the earth materials throughout the length of the conveyance system impacted by the proposed development and substantiate the geotechnical parameters utilized in analyses. The type of the tests performed will depend on the type and distribution of the earth materials encountered during field explorations, and the geotechnical input parameter requirements of the analysis needed to be conducted to evaluate potential adverse effects of the proposed development on the impacted reach of the conveyance system. All tests shall be conducted in accordance with industry accepted standards of practice. Appropriate tests would include, but not limited to, in-situ moisture content and dry density, grain size analyses (sieve, or sieve and hydrometer analyses), Atterberg Limits tests, strength testing (direct shear, unconfined compression, and tri-axial), consolidation testing, hydro-consolidation tests (collapse), and maximum dry density testing.

4. Required Geotechnical Analysis

Geotechnical analysis shall be required to support all planned development adjacent to the conveyance system. The type of required analysis will depend upon the type of development planned adjacent to or over the conveyance system, and the potential impacts to the conveyance system associated with the planned development. All geotechnical analysis conducted and submitted to Metropolitan shall be performed in accordance with industry accepted methodologies and standard geotechnical practice. Geotechnical analysis submitted shall clearly indicate, identify, and explain all assumptions, methods, procedures, and input parameters used. The results of the geotechnical analysis shall include all calculations and appropriate supporting documentation, and shall fully describe the findings and conclusions of the analysis as these results pertain to the impacted reach of the conveyance system.

Minimum requirements for geotechnical analysis to be submitted to Metropolitan are provided in the following sections, which are classified by the type of development construction. Depending upon the type and extent of proposed development, and the potential adverse affects to the conveyance system, all applicable geotechnical analysis indicated herein shall be provided to Metropolitan for review.

4.1 **Embankments** – The following minimum requirements for geotechnical analysis pertain to all embankments, fills, roadways constructed above and adjacent to the conveyance system, including embankments supported by retaining structures. Four areas of concern associated with embankments shall be addressed by geotechnical analysis.

- Increased load imposed on the affected reach of the conveyance system, both horizontal and vertical under static and dynamic conditions.
- Induced deformation of the affected reach of the conveyance system, both settlement and lateral displacement under static and dynamic conditions.
- Induced instability of the affected reach of the conveyance system under static and dynamic conditions.
- Minimum clearances of installations and constructions.

Minimum requirements for geotechnical analysis and supporting documentation related to embankments are as follows:

4.1.1 Based upon the results of field explorations and laboratory testing, a geologic map shall be prepared of the impacted area of the conveyance system, at a scale appropriate for the project (preferred scale 1 inch = 40 feet). The map shall clearly indicate the location of the proposed development relative to the conveyance system with Metropolitan Station numbers, and the locations of all field explorations (borings, CPT's, testpits, seismic refraction lines, etc.). The geologic map shall also include reference to the vertical datum utilized. Observed geologic contacts, bedding, foliation, clay seams, joints, faults, shear zones, and other relevant geologic information shall be noted on geologic map, as appropriate. The horizontal limits of the geologic map shall extend at least 200 feet normal to, and on both sides of the conveyance system,

and at least 200 feet beyond the limits of the proposed development along the conveyance system.

4.1.2 The proposed grading plan for the development shall also be submitted. This plan shall be prepared at the same scale with the same horizontal limits as the geologic map discussed above, showing both the existing and proposed grading topographic contour lines. The geologic map can be combined with the proposed grading plan provided that the required information can be clearly conveyed in the combined format.

4.1.3 One longitudinal profile along the conveyance system shall be prepared at the same scale as the grading plan, showing the affected reach of the conveyance system with Metropolitan Station numbers. The profile shall show existing grade and proposed finished grade surfaces, groundwater elevation, subsurface elevations and conditions, bedrock elevations, as well as locations of projected field explorations.

4.1.4 Transverse cross-sections normal to the conveyance system shall also be prepared. The transverse cross-sections shall be provided at a minimum spacing of 20-foot on center, referenced to Metropolitan Station numbers of the conveyance system, and shall show all information required above for the longitudinal profile, including scale used. The cross-sections shall also include the embankment location, height and configuration, and its minimum horizontal setback to the conveyance system. Adjustments can be made in the spacing of the transverse cross-sections depending upon the variability of the existing ground or finished grade surface, and subsurface conditions. However, if abrupt, drastic, or sudden changes occur in the conveyance system plan and profile as well as existing ground or proposed finished grade surfaces, and/or the subsurface stratigraphy along the conveyance system, then additional transverse cross-sections shall be prepared at such locations.

4.1.5 Stress analysis using formulas based on the theory of elasticity (such as Boussinesq, Westergaard, etc.) shall be conducted at 10-foot intervals along the impacted reach of the conveyance system to determine the total and incremental loads imposed on the conveyance system by the proposed embankment. The analysis shall consider both vertical and lateral imposed loading on the conveyance system, and shall consider the three-dimensional configuration of the grading for the proposed development and the conveyance system. If the embankment includes a roadway or other sources of traffic loading, the analysis shall include generated live and dead loads. The results of the increased induced-loading shall be presented in both tabular and graphical formats, and

shall present the vertical and horizontal components separately. All results shall be presented relative to the Metropolitan Station numbers of the conveyance system.

4.1.6 Settlement/rebound analysis shall be performed at 10-foot intervals along the impacted reach of the conveyance system to evaluate induced vertical deformation to the conveyance system due to the proposed development. If the embankment includes a roadway, or other sources of traffic loading, the analysis shall include generated live and dead loads. The analysis shall be based on one-dimensional Terzaghi's consolidation theory using representative consolidation test results performed on undisturbed samples collected from the foundation soil, underlying the conveyance system, during the field exploration. The settlement/rebound analysis shall consider the three-dimensional configuration of the grading for the proposed development and the conveyance system, and shall be conducted for points along the conveyance system at least 10 feet beyond both sides of any zero-settlement/rebound points within the impacted reach of the conveyance system. Settlement/rebound analysis due to hydro-consolidation and/or swelling of the foundation soil underlying the conveyance system caused by fluctuation of the groundwater or infiltration of surface water shall be performed. The results of settlement/rebound analysis loading shall be presented in both tabular and graphical formats. The tabular listing of the estimated settlement/rebound shall include the elevations of the bottom of the conveyance system, the alluvium/bedrock contact, groundwater, existing ground surface, and proposed finished grade surface. The table shall present results relative to Metropolitan Station numbers. The graphical representation of the settlement/rebound analysis shall show the estimated settlement/rebound values plotted against Metropolitan Station numbers.

4.1.7 Based on the results of the stress analysis (Item 4.1.5) performed on transverse cross-sections (Item 4.1.4 above), slope stability analysis using Spencer's Method shall be performed on the most critical sections. The critical transverse sections shall be selected in terms of the maximum height of the fill for the proposed development as well as the minimum burial depth of the conveyance system and its minimum horizontal clearance from the toe of the proposed embankment slope. The slope stability analysis on each of the critical sections shall be performed initially for static loading conditions by identifying potential sliding blocks/failure surfaces with minimum factor of safety values that contain the impacted reach of the conveyance system. For each critical section, the identified potential failure plane/failure surface shall be

plotted and labeled with the corresponding calculated static factor of safety and yield acceleration value. If the yield acceleration value for a critical cross-section is equal to, or lower than, the zero period peak horizontal ground acceleration (zero period acceleration= ZPA) discussed under "Seismic Design Criteria," then a seismic deformation analysis using the simplified Makdisi-Seed method shall be performed; a seismic deformation analysis will not be required if the yield acceleration exceeds the ZPA value. The results of the slope stability analysis shall be presented in tabular form. The table shall present the estimated static factor of safety and seismically induced lateral deformation along the corresponding Metropolitan Station numbers for each critical section.

4.1.8 Based on the results of stress, settlement/rebound, and slope stability analyses results, critical sections shall be selected along the impacted reach of the conveyance system to perform more refined deformation analyses under both static and seismic loading conditions. Depending on the configuration of the proposed embankments and its proximity to the conveyance system, two- and/or three-dimensional nonlinear finite element/finite difference analysis shall be performed on the selected critical sections.

The analyses shall consist of three parts: 1) static (gravity) analysis to evaluate initial stresses in the foundation soil, before an input earthquake motion is applied; 2) dynamic analysis to evaluate responses and deformations of the conveyance system to the combination of gravity and the input earthquake motion; and 3) post-earthquake analysis to evaluate deformations of the conveyance system under the gravity load alone, following the effects of earthquake shaking on properties, stresses, and strains within the foundation soil.

The embankment/foundation soil, containing the conveyance system, in the section shall be discretized into homogeneous, isotropic triangular/quadrilateral elements and nodal points, resulting in a finite element/finite difference mesh. Each soil element shall be characterized by its geometry, total unit weight, Poisson's ratio, effective shear strength (cohesion intercept and friction angle), undrained shear strength, residual shear strength (for liquefiable materials), maximum shear modulus, variation of normalized shear modulus with shear strain, and bulk modulus. For cases where soil degradation to a liquefiable or weakened state during or shortly after seismic shaking is required, excess pore water pressure and or/degradation parameters shall also be specified.

The nonlinear behavior of the embankment/foundation soils shall be incorporated in the analysis by an appropriate nonlinear constitutive model representing the nonlinear behavior of the foundation soils under drain and undrained conditions for both static and under the design MCE event. In addition, degradation of shear modulus due to induced shear strain shall be used in both the static and dynamic analyses.

The structures, including piles, shall be modeled by nonlinear beam column elements. Each end of the element, located below the ground surface, shall be either connected to a nodal point or contained in an element in the foundation soil. Young's modulus, section area, moment of inertia, and yield shear and moment shall be specified for each beam element.

For the static analysis, the nodal points located on lateral vertical boundaries of the mesh shall be set on vertical rollers and the nodal points located on the horizontal base of the mesh shall be fixed both in the horizontal and vertical directions.

For dynamic analysis, however, the lateral boundaries shall be connected to transmitting boundaries representing free-field conditions; and the base of the section shall be connected to a compliant base, representing a linear elastic half-space underlying the section. The compliant base prevents the trapping of seismic energy within the discretized system above the base and in effect simulates the application of the input motion at the surface of a hypothetical bedrock outcrop. The properties of the half-space shall be defined by its unit weight and shear wave velocity.

As discussed under "Seismic Design Criteria," an ensemble of acceleration time histories shall be used with normal and reverse polarity as outcropping motions at the compliant base in the time domain nonlinear dynamic analysis. The analysis shall be carried out for a few second (a quiet zone - Part 3) after cessation of shaking to let all excited elements stop vibrating due to viscous damping in the system and lack of the input acceleration.

The above analyses shall be performed for both the existing conditions and the existing conditions with the proposed embankments.

The analysis results will be used to determine the adverse effects of the induced deformations on the structural integrity of the conveyance

system due to the proposed embankments under gravity load as well as during and after the MCE event at the site. If the calculated displacements at a few locations at the conveyance system and the proposed embankments are appeared to be constant and stationary versus time after the cessation of shaking (during the quiet zone - Part 3), the impacted reach of the conveyance system and the proposed embankments will be considered stable, otherwise, unstable and prone to flow slide and total failure. If the difference between the calculated deformations of the conveyance system under the existing conditions and the existing conditions with the proposed embankments are larger than the allowable value for the conveyance system, appropriate mitigation measures to minimize potential geotechnical-related impacts to the conveyance system shall be submitted to Metropolitan for review and approval.

4.2 **Excavations** – The following minimum requirements for geotechnical analysis pertain to large open excavations, both temporary and permanent, made adjacent to the conveyance system, including reinforced slopes. Submittal requirements for shored excavations and pits constructed adjacent to the conveyance system, including permanent retaining walls, are covered in the next section. Three areas of concern associated with excavations shall be addressed by the geotechnical analysis.

- Induced instability of the conveyance system under static and dynamic conditions.
- Induced deformation of the conveyance system, both settlement and lateral displacement under static and dynamic conditions.
- Minimum clearances of installation and construction.

Minimum requirements for geotechnical analysis and supporting documentation related to excavations are as follows:

4.2.1 A geologic map and a proposed grading plan shall be submitted. The requirements for the preparation of the geologic map and grading plan shall be the same as those requirements previously indicated under "Embankments," Items 4.1.1 and 4.1.2.

4.2.2 Transverse cross-sections normal to the conveyance system shall be prepared. The transverse cross-sections shall be provided at a minimum spacing of 20-foot on center, reference to Metropolitan Station numbers

of the conveyance system, and shall show all information previously indicated for the longitudinal profiles, including scale used, under "Embankments," Item 4.1.3. The cross-sections shall also include the excavation location, depth, and configuration, and its minimum horizontal clearance to the conveyance system. Adjustments can be made in the spacing of the transverse cross-sections depending upon the variability of the existing ground or finished grade surface, and the subsurface conditions. However, if abrupt, drastic, or sudden changes occur in the existing ground or proposed finish grade surfaces, and/or the subsurface stratigraphy along the conveyance system, then additional transverse sections shall be prepared at such locations.

4.2.3 Stress analysis using formulas based on the theory of elasticity (such as Boussinesq, Westergaard, etc.) shall be conducted at 10-foot intervals along the impacted reach of the conveyance system to determine the total and incremental loads imposed on the conveyance system by the proposed excavation. The analysis shall consider both vertical and lateral imposed loading on the conveyance system, and shall consider the three-dimensional configuration of the proposed grading for the proposed development and the conveyance system. The results of the increased induced-loading shall be presented in both tabular and graphical formats, and shall present the vertical and horizontal components separately. All results shall be presented relative to the Metropolitan Station numbers of the conveyance system.

4.2.4 Settlement/rebound analysis shall be performed at 10-foot intervals long the impacted reach of the conveyance system to evaluate induced vertical deformation to the conveyance system due to the proposed excavations. The analysis shall be based on one-dimensional Terzaghi's consolidation theory using representative consolidation test results performed on undisturbed samples collected from the foundation soil, underlying the conveyance system, during the field explorations. The settlement/rebound analyses shall consider the three-dimensional configuration of the proposed excavations and the conveyance system, and shall be conducted for points along the conveyance system at least 10 feet beyond both sides of any zero-settlement/rebound points within the impacted reach of the conveyance system. If the alluvium/bedrock contact is not encountered during the field exploration, a minimum alluvial thickness of 50 feet below the invert of the conveyance system shall be considered for the rebound analysis. Criteria for analyzing and presenting the results shall be the same as required for the settlement/rebound analysis under "Embankments," Item 4.1.6.

4.2.5 Based on the results of the stress analysis (Item 4.2.3) on transverse cross-section (Item 4.2.2), slope stability analysis shall be performed on the most critical sections. The requirements for the slope stability analysis shall be the same as the requirements under "Embankments," Item 4.1.7 and "Seismic Design Criteria," except the seismic deformation analysis may not be required per Metropolitan's approval for temporary excavations/cut slopes.

4.2.6 If reinforced slopes (soil nails, soil anchors, and rock anchors) are proposed, transverse cross-sections normal to the face of the slope shall be prepared and complete design calculations shall be submitted. The transverse cross-sections shall be prepared as required in Item 4.2.2 above. The design calculations shall clearly indicate all loading conditions considered and design parameters utilized, and shall include stability analyses demonstrating both internal and external stability of the reinforced slope system, as well as global stability. Calculations shall also be submitted to substantiate nail/anchor design. The seismic design of all permanent reinforced slope systems shall incorporate Metropolitan's "Seismic Design Criteria," except the seismic design may not be required per Metropolitan approval for temporary slope systems.

4.2.7 For all excavations and based on the results of stress, settlement/ rebound and slope stability analyses results, critical sections shall be selected along the impacted reach of the conveyance system to perform refined deformation analyses under both static and seismic loading conditions. Depending on the configuration of the proposed excavation and its proximity to the conveyance system, two- and/or three-dimensional nonlinear finite element/finite difference analyses shall be performed on the selected critical sections. The requirements for the deformation analyses shall be the same as the requirements under "Embankments," Item No. 4.1.8, except the seismic deformation analysis may not be required per Metropolitan approval for temporary excavations/cut slopes. The above analyses shall be performed for both the existing conditions and the existing conditions with the proposed permanent excavations.

The analysis results will be used to determine the adverse effects of the induced deformations on the structural integrity of the conveyance system due to the proposed excavations under gravity load as well as during and after the MCE event at the site. If the calculated displacements at a few locations at the conveyance system and the proposed excavations are appeared to be constant and stationary versus

time after the cessation of shaking (during the quiet zone - Part 3, Item 4.1.8), the impacted reach of the conveyance system and the proposed excavations will be considered stable, otherwise, unstable and prone to flow slide and total failure. If the difference between the calculated deformations of the conveyance system under the existing conditions and the existing conditions with the proposed excavations are larger than the allowable value for the conveyance system, appropriate mitigation measures to minimize potential geotechnical-related impacts to the conveyance system shall be submitted to Metropolitan for review and approval.

4.2.8 If dewatering is required or anticipated to be accomplished as part of the excavation, additional geotechnical submittal requirements shall apply. These requirements are presented under "Dewatering."

4.2.9 In addition to the design information required herein, a description of the proposed sequence of construction shall be submitted for all excavations, including installation and decommissioning of reinforced slope system elements.

4.3 **Shored Excavations/Retaining Walls** – The following minimum requirements for geotechnical analysis pertain to shored excavations and pits constructed adjacent to the conveyance system, including permanent retaining walls. Four areas of concern associated with shoring/retaining structures shall be addressed by the geotechnical analysis.

- Structural integrity of shoring/retaining system under static and dynamic conditions.
- Induced instability of the conveyance system under static and dynamic conditions.
- Induced deformation of the conveyance system, both settlement and lateral displacement, under static and dynamic conditions.
- Minimum clearance of installation and construction.

Minimum requirements for geotechnical analysis and supporting documentation related to shored excavations and retaining walls are as follows:

4.3.1 A geologic map and a proposed grading plan shall be submitted. The requirements for the preparation of the geologic map and grading plan shall be the same as those requirements previously indicated under "Embankments," Items 4.1.1 and 4.1.2.

4.3.2 Where shoring/retaining walls are proposed, transverse cross-sections normal to the face of the shoring/retaining wall shall be prepared. The transverse cross-sections shall be provided at a minimum spacing of 20 feet on center, reference to Metropolitan Station numbers of the conveyance system, and shall show all information previously indicated for the longitudinal profile, including scale used, under "Embankments," Item 4.1.3. The cross-sections shall also include the location, depth, and configuration of the shoring/retaining walls, and its minimum horizontal clearance to the conveyance system. Adjustments can be made in the spacing of the transverse cross-sections depending upon the variability of the existing ground or finished grade surface, shoring/retaining wall configuration, and the subsurface conditions. However, if abrupt, drastic, or sudden changes occur in the existing ground or proposed finish grade surfaces and/or the subsurface stratigraphy along the conveyance system, then additional transverse sections shall be prepared at such locations.

4.3.3 Complete design calculations shall be submitted. The design calculations shall clearly indicate all loading conditions considered and design parameters utilized. Shoring design shall include calculations indicating the anticipated deformations of the shoring system, and the anticipated deformation of the adjacent supported conveyance system. Calculations for the retaining walls shall include stability analysis demonstrating both internal and external stability of the retaining system, as well as global stability. The seismic design of all permanent retaining systems shall incorporate Metropolitan's "Seismic Design Criteria," except the seismic design may not be required per Metropolitan approval for temporary shoring systems.

4.3.4 If the configuration of the shoring/retaining wall systems includes the use of slopes above the top of shoring/retaining walls, then the analyses requirements for "Excavations" shall also be addressed and submitted.

4.3.5 For shored excavations/retaining walls and based on slope stability analyses results, critical sections shall be selected along the impacted reach of the conveyance system to perform more refined deformation analyses under both static and seismic loading conditions. Depending on the configuration of the proposed development and its proximity to

the conveyance system, two- and/or three-dimensional nonlinear finite element/finite difference analyses shall be performed on the selected critical sections. The requirements for the deformation analyses shall be the same as the requirements under "Embankments," Item No. 4.1.8, except the seismic deformation analysis may not be required per Metropolitan approval for temporary shored excavations/retaining walls. The above analyses shall be performed for both the existing conditions and the existing conditions with the proposed retaining walls.

The analysis results will be used to determine the adverse effects of the induced deformations on the structural integrity of the conveyance system due to the proposed shored excavations/retaining walls under gravity load as well as during and after the MCE event at the site. If the calculated displacements at a few locations at the conveyance system and the proposed development are appeared to be constant and stationary versus time after the cessation of shaking (during the quiet zone - Part 3, Item 4.1.8), the impacted reach of the conveyance system and the proposed shored excavations/retaining walls will be considered stable, otherwise, unstable and prone to flow slide and total failure. If the difference between the calculated deformations of the conveyance system under the existing conditions and the existing conditions with the proposed shored excavations/retaining walls are larger than the allowable value for the conveyance system, appropriate mitigation measures to minimize potential geotechnical-related impacts to the conveyance system shall be submitted to Metropolitan for review and approval.

4.3.6 In addition to the design information required herein, a description of the proposed sequence of construction shall be submitted for all shoring/retaining systems, including installation and decommissioning of temporary shoring.

4.4 **Structures** – The following minimum requirements for geotechnical analysis pertain to all structures constructed above or adjacent to the conveyance system, including pile supported structures. Three areas of concern associated with structures shall be addressed by the geotechnical analysis.

- Increased load imposed on the conveyance system, both vertical and lateral under static and dynamic conditions.

- Induced deformation of the conveyance system, both settlement and lateral displacement under static and dynamic conditions.

- Minimum clearances of installation and construction.

Minimum requirements for geotechnical analysis and supporting documentation related to structures are as follows:

4.4.1 A geologic map and a proposed grading plan shall be submitted. The requirements for the preparation of the geologic map and grading plan shall be the same as those requirements previously indicated under "Embankments," Items 4.1.1 and 4.1.2.

4.4.2 The proposed structure layout plan shall be submitted. This plan shall be prepared at the same scale as the grading plan and shall clearly show the locations and dimensions of proposed structures and their foundations, including pile foundations, relative to the conveyance system. Structural foundation plans clearly indicating foundation configurations, depths, and widths shall also be submitted.

4.4.3 Longitudinal and transverse cross-sections as required under "Embankments," Items 4.1.3, and 4.1.4, shall be prepared. These profile and sections shall clearly show the locations, depths, and configuration of proposed structures, and their minimum vertical and horizontal clearances to the conveyance system.

4.4.4 Settlement/rebound analysis shall be performed at 10-foot intervals along the impacted reach of the conveyance system to evaluate induced vertical deformation to the conveyance system by structural loads. The settlement/rebound analysis shall be performed and reported as indicated under "Embankments," Item 4.1.6.

4.4.5 Stress analysis shall be conducted at 10-foot intervals along the impacted reach of the conveyance system to determine the total and incremental loads imposed on the conveyance system by the proposed structures. The analysis shall consider both vertical and laterally imposed live and dead loads. In the case of pile foundations, the analysis shall include lateral pile analysis as well as determination of dragdown/uplift forces. The results of the increased induced-loading shall be presented in both tabular and graphical formats, and shall present the vertical and horizontal component separately. All results shall be presented relative to Metropolitan's Station numbers of the conveyance system.

4.4.6 Lateral deformation analysis shall also be performed at 10-foot intervals along the impacted reach of the conveyance system to evaluate induced

horizontal deformation to the conveyance system by proposed structures. Criteria for analyzing lateral deformation and presenting the results shall be the same as required for settlement analysis.

4.4.7 Based on the stress, deformation, and settlement/rebound analysis results, critical sections shall be selected along the impacted reach of the conveyance system to perform more detail and accurate deformation analyses under both static and seismic loading conditions. Depending on the configuration of the proposed structure and its proximity to thc conveyance system, two- and/or three-dimensional nonlinear finite element/finite difference analyses shall be performed on the selected critical sections. The requirements for the deformation analyses shall be the same as the requirements under "Embankments," Item 4.1.8. The above analyses shall be performed for both the existing conditions and tjhe exostomg cpmcotopms wot tje [rp[psed strictores.

The analysis results will be used to determine the adverse effects of the induced deformations on the structural integrity of the conveyance system due to the proposed structures under gravity load as well as during and after the MCE event at the site, as discussed under "Seismic Design Criteria." If the calculated displacements at a few locations at the conveyance system and the proposed structures are appeared to be constant and stationary versus time after the cessation of shaking (during the quiet zone – Part 3, Item 4.1.8), the impacted reach of the conveyance system and the proposed structures will be considered stable, otherwise, unstable and prone to flow slide and total failure. If the difference between the calculated deformations of the conveyance system under the existing conditions and the existing conditions with the proposed structures are larger than the allowable value for the conveyance system, appropriate mitigation measures to minimize potential geotechnical-related impacts to the conveyance system shall be submitted to Metropolitan for review and approval.

4.4.8 In addition to the design information required herein, if pile foundations are part of the structural design, a description of the proposed construction methods shall be submitted, which shall include provisions, as necessary, for unstable or caving ground conditions, and groundwater.

4.5 **Dewatering** – The following minimum requirements for geotechnical analysis pertain to dewatering required for development adjacent to the conveyance system, including temporary construction dewatering. Two areas of concern associated with dewatering shall be addressed by the geotechnical analysis.

- Effectiveness of dewatering system.

- Dewatering-induced settlement of the conveyance system.

Minimum requirements for geotechnical analysis and supporting documentation related to dewatering are as follows:

4.5.1 The proposed dewatering plan shall be submitted. The plan shall include a description of the proposed dewatering system, as well as a drawing showing the layout and location of the system. This drawing shall be prepared at the same scale as the grading plan and other applicable development plans, and shall clearly show the locations of the dewatering systems elements, and the locations and dimensions of the proposed excavation/features that require the dewatering relative to the conveyance system.

4.5.2 Transverse cross-sections normal to the conveyance system shall be prepared at locations where dewatering systems are proposed. Transverse cross-sections shall be provided as required to illustrate the location and configuration of the excavation and proposed dewatering system, and shall show all information previously indicated for transverse profiles, including scale used, under "Embankments," Item 4.1.4. The cross-sections shall include the location, depth, and configuration of the excavation requiring dewatering, and its minimum horizontal clearance to the conveyance system. The sections shall show existing grade and proposed finished grade surfaces, subsurface elevations and conditions, as well as locations of projected field explorations.

4.5.3 One longitudinal profile along the conveyance system shall be prepared at the same scale as the grading plan, showing the affected reach of the conveyance system with Metropolitan Station numbers. The profile shall illustrate the location and configuration of the excavation and proposed dewatering system, and shall show all information previously indicated for the longitudinal transverse profile, including scale used, under "Embankments," Item 4.1.3. The profile shall show existing grade and proposed finished grade surfaces, subsurface elevations and conditions, as well as locations of projected field explorations.

4.5.4 Calculations supporting the basis for the dewatering plan shall be submitted. These calculations shall provide the basis for the depth, diameter, and number of dewatering wells, and shall include the anticipated drawdown analysis, including the methods, assumptions,

and parameters used for this determination. The results of the anticipated drawdown analysis shall be graphically, showing the projected lowered groundwater surface relative to the conveyance system using both longitudinal and transverse cross-sections.

4.5.5 The means and methods that will be used to monitor and verify the dewatering operation shall be provided, including the location of proposed monitoring wells.

4.5.6 Details shall be provided for all dewatering wells and monitoring wells used in the dewatering systems. Submitted information shall include, but not limited to, diameter and depth of wells, pipe size and slot configuration, and backfill types and configuration.

4.5.7 Analysis shall be conducted to evaluate dewatering-induced settlement of the affected reach of the conveyance system caused by dewatering operation, which will depend on the magnitude of the drawdown and the extent of the cone of depression. The settlement analyses shall be conducted and presented in accordance with the requirements indicated under "Embankments," Item 4.1.6.

4.6 **Trenchless Utility Installations:** The following minimum requirements for geotechnical analysis pertain to utility lines being installed adjacent and parallel to, or beneath the conveyance system using trenchless methods of construction, such as jacked casing, horizontal directional drilling, or micro-tunneling. Two areas of concerns associated with the installation of utility lines parallel and adjacent to and beneath the conveyance systems shall be addressed by the geotechnical analysis:

- Stability of excavation and its effect on stability/settlement of the conveyance system
- Effect of shoring system on the conveyance system

Minimum requirements for geotechnical analysis and supporting documentation related to trenchless utility installation adjacent to or beneath the conveyance systems are as follows:

4.6.1 A description of the proposed methods and equipment to be used for the installations shall be submitted. The description shall include, but not limited to, methods, procedures, and construction sequencing or

underground mining and excavation, underground excavation support, utility installation within excavation, grouting and backfilling, and protection and support of adjacent features including the conveyance system. The description shall also include installation sizes and dimensions as well as the maximum grout pressure for each foot of ground cover, the maximum grout pressure, and how the grouting pressure shall be controlled so as to avoid displacing and squeezing the ground overlying the jack casing. The proposed methods and procedures for underground mining and excavation shall be compatible with the anticipated ground conditions, and shall include appropriate provisions to maintain and control the stability of the excavation face to prevent loss of ground in advance of the underground excavation. Additionally, if the anticipated ground conditions exhibit characteristics associated with running or flowing ground, a contingency plan to handle such unstable ground shall be provided.

4.6.2 Plans of the proposed trenchless utility installations shall be submitted showing the location and configuration of the installation. This drawing shall be prepared at the same scale as the grading plan and other applicable development plans, and shall clearly show the locations of the utility installation, and the locations and dimensions of the proposed excavations/pits that will be used for the installation relative to the conveyance system.

4.6.3 Transverse cross-sections normal to the conveyance system shall be prepared at locations where the trenchless utility installations are proposed. Transverse cross-sections shall be provided as required to illustrate the location and configuration of the installation, and shall show all information previously indicated for transverse profiles, including scale used, under "Embankments," Item 4.1.4. The cross-sections shall include working/receiving pit locations, depths, and the minimum vertical/horizontal clearances from the conveyance system.

4.6.4 Calculations shall be submitted to support the proposed trenchless utility installation. These calculations shall include, but not limited to, structural capacity of all casing and other underground excavation support elements, and required jacking/tunneling pressures. For the case of utility installation underneath the conveyance system, analyses shall be submitted evaluating load transfer from a jacked casing/ directional bore/micro-tunnel via skin friction onto the conveyance system.

4.6.5 Geotechnical analysis requirements previously indicated for shored excavation/retaining walls shall be submitted for all shored excavations and shoring systems required in conjunction with the trenchless utility installation. The required shoring calculations shall also demonstrate that the proposed shoring system can resist anticipated loads imposed onto the shoring from jacking or tunneling activities.

4.6.6 If dewatering is required or anticipated as part of the trenchless utility installation, the analyses requirements indicated under the "Dewatering" shall be submitted.

5. Seismic Design Criteria

The following briefly describes Metropolitan's seismic desing criteria shall be used to evaluate the adverse impacts, if any, of the proposed development on the structural integrity of the conveyance system.

5.1 Metropolitan's seismic design criteria are in accordance with the IBC 2009. The criteria entail determining an earthquake magnitude and developing a horizontal acceleration response spectrum at 5 percent damping. Based on the IBC 2009, the response spectrum shall be based on both probabilistic seismic hazard analysis (PSHA) and deterministic seismic hazard analysis (DSHA). The PSHA results shall represent a seismic event with an average return period of about 2500 years (2 percent probability of exceedance in 50 years). The DSHA results shall be based on the median (50 percentile) acceleration from the controlling fault multiplied by 1.5. The controlling fault and its maximum considered earthquake (MCE) shall be determined. The maximum considered earthquake (MCE) shall be the smaller of the probabilistic earthquake (2 percent probability of exceedance in 50 years based on PSHA) and deterministic earthquake (1.5x median based on DSHA).

5.2 For performing the site-specific PSHA and DSHA, at least the three of the most current appropriate attenuation relationships shall be selected and average acceleration values shall be used to establish a site-specific response spectrum at 5 percent damping. The attenuation relationships shall represent the subsurface condition at the site and the rupture mechanism (style of faulting) of the controlling fault(s). The DSHA and PSHA acceleration values shall be compared and the lower ones shall be selected as a design response spectrum at 5 percent damping. Please note that if the proposed development cross or run parallel and close to the conveyance system with varying distances to the controlling faults, a site-specific design response spectrum shall be developed

and submitted to Metropolitan for review and approval for each segment along the impacted reach of the conveyance system.

5.3 At least three horizontal acceleration time histories shall be developed for use in time-domain nonlinear dynamic analysis for each segment. The design response spectrum at each segment shall be used as the target for the spectral adjustment of the selected recorded time histories. The design response spectrum shall be in accordance with Items 5.1 and 5.2 above. Development of the acceleration time histories for the project site shall entail the following:

- At least three "seed" time histories shall be selected based on the earthquake event controlling either PSHA or DSHA shaking conditions at the site, namely a moment magnitude from the controlling fault and its closest distance to the site. Other criteria which shall be used as guidance in the selection of the seed recorded time histories are:

    1) the subsurface condition at the recording station shall be similar to that of the site, and

    2) the rupture mechanism (strike-slip, thrust, etc.) shall be similar to that of the controlling fault for the site.

- The response spectra of the selected three seed time histories shall be plotted along with the design response spectrum at 5 percent of damping.

- The selected recordings shall be modified in regard to the frequency content and amplitude so that the resulting response spectra shall generally follow the spectral shape and amplitudes of the target response spectrum.

- The modified time histories shall be base-line corrected such that at the end of the earthquake acceleration, velocity, and displacement values shall be all zero.

- Each base-line corrected acceleration time history along with its velocity and displacement time histories shall be plotted separately on one sheet.

- The response spectra of the base-line corrected acceleration time histories shall be plotted along with the design response spectrum at 5 percent of damping on one sheet.

6. Monitoring of Adjacent Conveyance System

Excavation: When the conveyance system is near a proposed excavation, it shall be monitored before, during, and after the proposed excavation to document any vertical and horizontal movements of the conveyance system due to the proposed excavation. The threshold values, recommended by Metropolitan's Pipeline and Facility Design Team, shall not exceed 3/8" for calculated deflection of temporary shoring system at any location and the maximum acceptable horizontal and vertical movements of the conveyance system (pipeline) shall not be greater than ¼".

A land surveyor shall monitor the conveyance system at the start and end of each workday on a daily basis during excavation or installation of shoring systems. Monitoring shall be performed at the same time(s) everyday that monitoring is performed. Interpreted survey data shall be made available to Metropolitan within 12 hours after readings are taken.

The frequency of measurements shall be doubled or otherwise modified, as directed by Metropolitan, when measurements exceed the threshold values specified by Metropolitan's Pipeline and Facility Design Team. The land surveyor shall immediately notify Metropolitan of any reading exceeding the threshold values. If excessive movement is taking place, the contractor shall modify construction and support procedures, as approved by Metropolitan, to minimize additional ground or shoring system displacement.

The results of measurements shall be tabulated. A report shall be prepared to tabulate the measured displacement levels. The report shall also include information such as measurement location, date, and depth of excavation. The highest measured displacement levels at each point and their relationship to the threshold values shall also be included in the report.

Pile/Sheetpile Driving Operation: When the conveyance system is near a proposed pile/sheetpile (hereon is called "pile") driving operation, it shall be monitored before and during the proposed operation to document any measured peak particle velocity (ppv) at and close to the conveyance system. The monitoring system shall be capable of measuring ppv and frequency level as low as 0.009 in/sec and 0.5 Hz, respectively. The energy transferred to the pile by a hammer, hammer stroke and blow rate, the pile displacement, and both compressive and tensile stresses on the pile shall be simultaneously measured during vibration monitoring as a function of time using either a Saximeter or preferably a Pile Driving Analyzer (PDA). The vibration monitoring system shall undergo certified laboratory calibration conformance at least once a year. And at

the time of measurement the vibration monitoring system shall have a certificate that is not expired.

For underground conveyance system (such as pipes, cut-and-cover conduits, and siphons) a downhole waterproof seismograph (e.g., a downhole three dimensional seismograph calibrated to measure ground velocities) shall be installed on the centerline of the conveyance system a maximum of 2 feet above its crown; and three seismographs shall be deployed and positioned on the existing ground surface at zero, 5, and 10 feet intervals from the centerline of the conveyance system toward the pile being driven. If the conveyance system is at the ground surface (such as canals or transition structures) two seismographs shall be installed next to its concrete lining on both sides; and three seismographs shall be deployed and positioned on the existing ground surface at 5, 10, and 15 feet intervals from the edge of the canal closes to the pile being driven.

The seismographs shall be placed on a straight line normal to the axis of the conveyance system coinciding with the centerline of each pile. These seismographs shall provide ground vibrations at the conveyance system and a few locations at the ground surface to evaluate attenuation of the ground vibrations with distance from the source. The seismographs shall provide the ppv along longitudinal, transverse, and vertical directions of the conveyance system.

When measurements exceed the threshold values specified by Metropolitan, the person who is responsible for the vibration monitoring and analysis shall immediately notify Metropolitan of any ppv reading exceeding the threshold values. If excessive ppv is taking place, the contractor shall modify construction and support procedures, as approved by Metropolitan, to minimize additional ground or shoring system displacement.

The results of measurements shall be tabulated. A report shall be prepared to tabulate the measured vibration levels at the three axes and the associated frequencies. The report shall also include information such as measurement location, date, and source of vibration. The highest measured vibration levels for each axis and their relationship to the threshold values shall also be included in the report.

7. Report Requirements

The required geotechnical exploration, testing, and analysis shall be submitted in a formal report/letter for Metropolitan's review. The presented geotechnical information shall be consistent with project plans and specifications. Geotechnical information submitted shall be signed, stamped and prepared under the

supervision of either a Civil or geotechnical Engineer registered in the State of California, and when applicable, a Registered Geologist or Engineering Geologist, registered in the State of California.

Calculations supporting geotechnical design shall be signed and stamped by either a Civil, Geotechnical, or Structural Engineer registered in the State of California. All geotechnical parameters used in support of calculations shall be clearly referenced and substantiated by the performed geotechnical exploration and testing. Structural calculations do not need to be included as part of submitted geotechnical reports, but sufficient documentation shall be provided with the calculations to identify their purpose and place within a development submittal.

All methods and procedures used for geotechnical analysis, including computer programs, shall be clearly described, referenced, and documented. All assumptions and limitations of analyses shall be fully explained. Results developed by computer programs shall include all input and output data generated, adequately annotated to fully explain the results.

Geotechnical reports/letters shall be logically organized to convey the required information, and shall be prepared as stand-alone documents. Geotechnical reports/letters shall be prepared as concisely as possible, but shall completely describe the explorations, tests, and analyses conducted. Geotechnical reports shall also clearly describe the geotechnical site conditions, and shall state the results of the conducted geotechnical work performed and discuss the potential geotechnical impacts associated with the proposed development on the conveyance system. A discussion as to how the proposed development will impact or not impact the affected conveyance system shall also be included. Geotechnical reports shall provide recommendations for additional geotechnical studies or potential mitigation measures to minimize potential geotechnical-related impacts to the conveyance system, as appropriate for the findings of the geotechnical work preformed.

Tom Paulek / Susan Nash
Friends of the Northern San Jacinto Valley
Post Office Box 4036
Idyllwild, California 92549

November 13, 2017

Tom Barnes
"on behalf of the California Department of Water Resources"
Perris Dam Emergency Release Facility Project
626 Wilshire Blvd, Ste. 1100
Los Angeles, CA 90017

Via: U.S. Mail and email: tbarnes@esassoc.com

RE: Recirculation of the Draft Environmental Impact Report (Draft EIR) for the proposed Perris Dam Emergency Release Facility- September, 2017
(SCH 201391027)

COMMENT A: This will be the third time the Friends of the Northern San Jacinto Valley have provided CEQA comments on the Department of Water Resources (DWR) Environmental Documents for this project. Our first comments were made back in 2010 on the Perris Dam Remediation Program Draft EIR. This early EIR analyzed three separate project components (1) Perris Dam Remediation, **(2) Outlet Tower replacement (3) Emergency Outlet extension.** Our second comment letter in 2016 was on the Draft EIR for the proposed Emergency Release facility (formerly named the emergency outlet extension), which is intended to allow DWR [Division of Safety of Dams] to safely convey water released from lake Perris in the event of an emergency, by diverting the flow away from residential development below the dam and channel the flow towards the Perris Valley Channel. This third CEQA public comment letter is on DWR's recirculation of portions of the 2016 Draft EIR for the proposed Perris Dam Emergency Release Facility. Thus far DWR has not provided responses to our earlier comment letters or has been dismissive of our concerns. It is our expectation with this comment letter DWR will provide creditable, professional responses to our legitimate issues and impacts of concern. END COMMENT A

COMMENT B: **Attachment-A** provides excerpts (pages 2-1 to 2-19) from the 2010 Perris Dam Remediation Program Draft EIR. DWR does not acknowledge the proposed Perris Dam Emergency Release facility is functionally connected to the existing Perris Dam Outlet Tower facility: *"The function of the emergency outlet facility is to convey water to MWD's delivery facility .... and to have the ability to release water from the lake when required during emergencies for safety of the dam." .... "The structural integrity of tower was evaluated in 2006 and was found to be deficient in shear capacity under pre-2008 seismic loading which would cause a failure of the structure. "several potential alternatives were considered to retrofit the tower, but none were found to be viable to reinforce the structure, given complexities of construction with water in the*

reservoir, thus construction of a new tower is required." (see Attachment A – Outlet Tower Replacement, pages 2-6 to 2-7) *"DWR is proposing to construct a new outlet structure as a replacement facility, because the existing tower may fail during a major earthquake."* (see Attachment A – 2.5.3 Outlet Tower Replacement, page 2-15) Apparently to avoid cost, DWR does not acknowledge the probable collapse of the existing outlet tower in a major earthquake, (a very likely occurrence in the earthquake prone project location) will render the proposed Emergency Release facility inoperable preventing the emergency release of water from the Perris dam. In addition the environmental document(s) indicate the present Perris Valley flood control channel cannot accommodate the emergency release of 3800 *cfs.* Thus, DWR needs to update/explain to the public in the Final EIR how the failure to replace the existing Outlet Tower and the current inability of the Perris channel to receive a emergency release of 3800 *cfs.* will compromise the public safety of the residences below the dam. END COMMENT B

COMMENT C: **Attachment-B** discloses to the public the *"Memorandum of Agreement (MOA) Regarding Mitigation of State Water Project (SWP) Wildlife Losses in Southern California,"* dated October 23, 1079. The subject Recirculation of the 2016 Emergency Release facility Draft EIR once again mistakenly refers to the Project site as the "SRA Segment" [State Recreation Area Segment] and ignores/disregards the prior assignment of these public lands to the Department of Fish and Wildlife (DFW) as mitigation for wildlife losses resulting from the construction of the State Water Project (SWP) pursuant to the Legislature enactment of the Davis-Dolwig Act. After the MOA was enacted these public lands were included within the boundary of the San Jacinto Wildlife Area (SJWA). Subsequently, the Stephens' kangaroo Rat Habitat Conservation Plan (SKRHCP) and the western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) designated the SJWA lands below the Perris dam a SKR Core Reserve / MSHCP Conservation Land under the "take" provisions of the State Natural Communities Conservation Planning Act (*NCCP Act - Fish and* Game Code §§ 2800-2835). DWR continues to ignore or acknowledge the MOA term

#6 indicating the state lands in front of Lake Perris Dam: *".... Shall be designated and made available for wildlife mitigation purposes. Uses of these lands for other purposes will not be allowed if such uses impinges upon the maintenance of wildlife populations, except as needed for SWP operations. DWR will replace such lands taken with lands acceptable to DFG."*[Note: DFG name changed by Legislature in 2012 to DFW] END COMMENT C

COMMENT D: Given the habitat destruction and continuing DWR disruptions of these designated wildlife conservation lands the Draft EIR needs to consider the MOA replacement alternative for the entirety of the SWP Mitigation lands remaining in front of the Perris dam. Replacement conservation habitat at the neighboring SJWA was a requirement when the former SWP mitigation lands [Fairgrounds Segment] were transferred to the Lake Perris Fairgrounds. The cumulative impacts of the Lake Perris Fairgrounds [auto and motocross tracks, truck parking, noise and light pollution] together with DWR's current and probable future habitat impacts have rendered the remaining MOA mitigation lands in front of Perris dam largely useless for wildlife conservation. [CEQA Guidelines § 15065(a)(3)] END COMMENT D

COMMENT E: The subject Draft EIR for the Emergency Release Facility mitigation measures BIO-2a, BIO-2b, and BIO-2c are biologically absurd and largely experimental [see Figure 2-4 Conceptual Levee Design], lacking in certainty [...if no small mammal use within five years DWR will coordinate with USFWS and CDFW to determine an appropriate habitat compensation property to be conserved in perpetuity], and constitute an illegal "take" [capture and release; exclusion until after project construction] of MSHCP covered species including the Stephens' Kangaroo Rat and the Los Angeles Pocket mouse (LAPM) [see Draft EIR Figure 3.3-3, Small Mammal Capture Data]. The impacts to MSHCP covered species cannot support the *"less than significant with mitigation"* findings by DWR and contradict the **Mandatory Findings of Significance** mandated by CEQA. [CEQA Guidelines § 15065(a)(1)] END COMMENT E

COMMENT F: It is also necessary for DWR to recognize both the SKRHCP and the MSHCP are "take" permits pursuant to the state Natural Community Conservation Planning Act [NCCP Act]. The legislature specifically included within the state NCCP Act section 2826 which provides: "*Nothing in this chapter* [NCCP Act] *exempts a project proposed in a natural community planning area from Division 13 (commencing with section 21000) of the Public Resources Code* [CEQA] *or otherwise alters or affects the applicability of that division.*" DWR's improper implementation of the SKRHCP and the MSHCP is exacerbated by its failure to correctly implement its CEQA duties with regard to endangered wildlife. DWR must correct these CEQA deficiencies and submit a revised EIR for public review and comment prior to further consideration of the proposed Perris Dam Emergency Release Facility.

Please notify us of the availability of the revised EIR for this project and thank you for your courtesy. END COMMENT F

Tom Paulek Signature

Tom Paulek
FNSJV Conservation Chair

Susan Nash Signature

Susan Nash FNSJV
President

Attachments:

A] Excerpts Perris Dam Remediation Program Draft EIR pages 2-1 to 2-19
B] Memorandum of Agreement Regarding Mitigation of State Water Project Wildlife Losses in Southern California – October 23, 1979

Cc: Governor Jerry Brown
State Senator Richard Roth, Senate District 31
Assemblymember Jose Medina, Assembly District 61

ATTACHMENT A

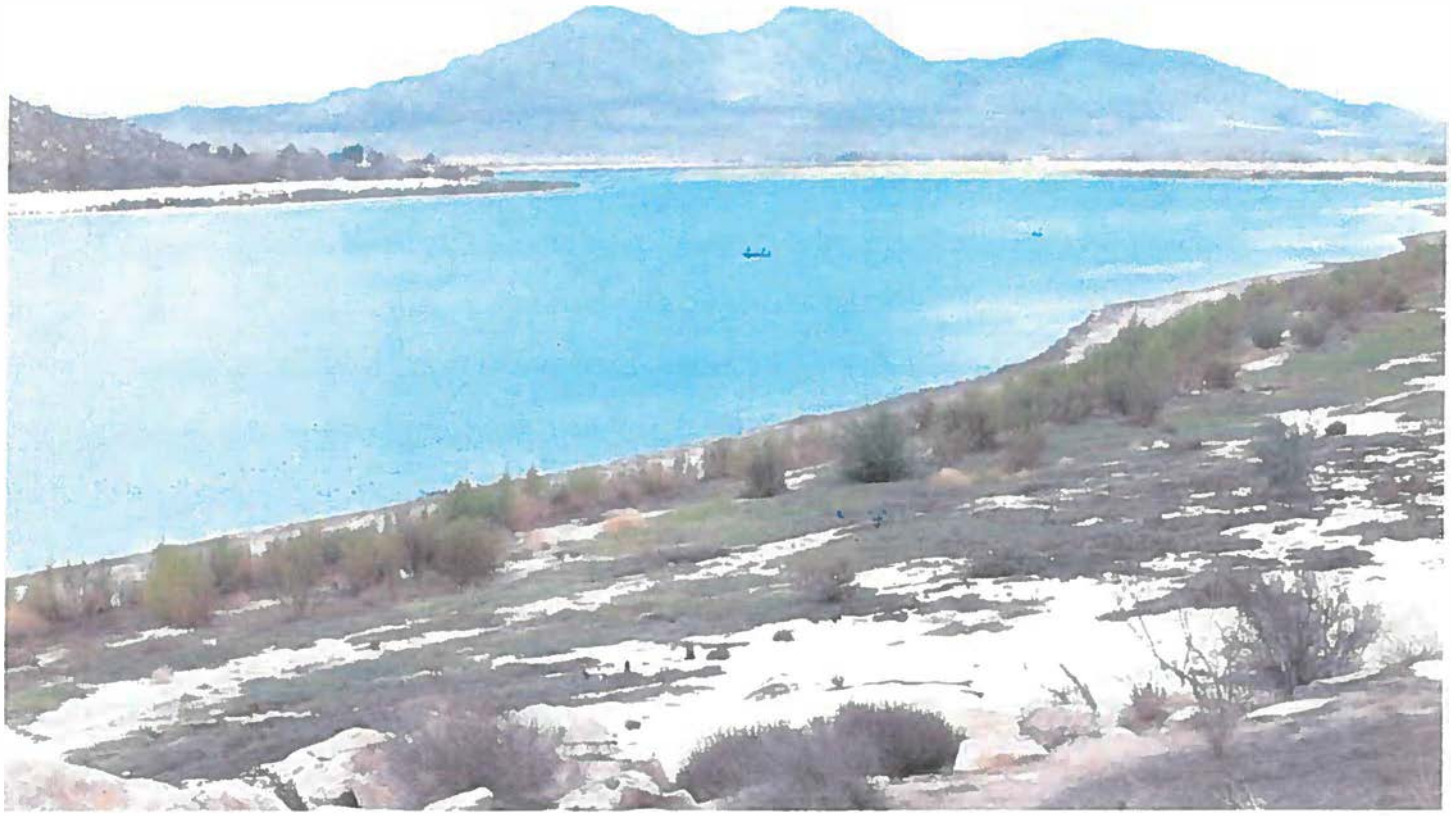
PERRIS DAM REMEDIATION PROGRAM

Draft Environmental Impact Report
SCH No. 2007061004

Prepared for
Department of Water Resources

January 2010

ESA



DWR001098

CHAPTER 2
Project Description

2.1 Overview

DWR proposes to implement the Lake Perris Dam Remediation Program to remediate the Lake Perris Dam, replace the outlet tower, and construct an outlet conveyance to connect with the Perris Valley Storm Drain. The project is being proposed to address seismic safety concerns and to bring the facilities up to current safety standards. This section provides some background on DWR and Lake Perris, identifies project objectives, and presents the proposed project description.

2.2 Project Background

2.2.1 State Water Project

DWR operates and maintains the State Water Project (SWP), supplying water to 29 contracting agencies across the state. DWR operates 33 storage facilities, 20 pumping plants, four pumping-generating plants, five hydroelectric power plants, and 660 miles of canals and pipelines within the SWP (DWR, 2007a). Lake Perris is the terminal reservoir for the East Branch of the California Aqueduct, providing a key water supply to Southern California State Water Contractors including the Metropolitan Water District of Southern California (MWD or Metropolitan), which provides potable water to 28 cities and water districts within Southern California.

The California Aqueduct conveys water to Southern California from the Sacramento-San Joaquin Delta. The Delta receives runoff from over forty percent of California's land including flows from the Sacramento and San Joaquin Valleys. Water travels south from the Delta to the 444 mile-long California Aqueduct. The Aqueduct then splits into the West and East Branches south of the Tehachapi Mountains. The East Branch extends through Lake Silverwood, continues on through the Santa Ana Pipeline, and then terminates at Lake Perris. **Figure 2-1** depicts the California Aqueduct extending southward from the Sacramento River Delta.

The amount of water available to the SWP fluctuates widely each year due to factors such as hydrologic conditions, flood management needs, the capacity of SWP storage and conveyance facilities, changing weather-temperature conditions, water quality, and environmental requirements. Water deliveries are based on the long-term contracts that DWR has with each of the 29 contractors. Though the proposed project would require Lake Perris to be refilled, the

SOURCE: DWR, 2007.

DWR - Perris Dam Remediation Program . 206008.02

Figure 2-1
State Water Project Overview

DWR001133

project would not cause additional water to be taken from the Delta. The lake would only be refilled when water is available, which is dependent on the factors described above.

Recent developments regarding the Delta have introduced uncertainty into the SWP's ability to convey water to the contractors. In 2004, the Bureau of Reclamation and DWR developed a new Operating Criteria and Plan (OCAP) for the SWP and the Central Valley Project (CVP). The OCAP included the project descriptions required for a comprehensive biological assessment of the effects of SWP and CVP operations on listed species. In 2004, USFWS issued a non-jeopardy biological opinion (BO) with regards to impacts to the Delta smelt caused by revised operations of the CVP and SWP. The BO concluded that adverse effects to the Delta smelt would be avoided or minimized by the conservation and adaptive management measures included in the OCAP. In May 2007, the Wanger decision made by the U.S. District Court found the OCAP BO for Delta smelt to be inconsistent with the Federal Endangered Species Act and required that it be rewritten. On December 14, 2007 the court established interim operating rules while the BO is being rewritten that include in-Delta flow limits in Old and Middle Rivers which have the effect of restricting SWP and CVP pumping (DWR, 2007b).

Since the Wanger decision, a new BO has been issued by the USFWS for Delta Smelt. DWR preliminary modeling analysis conducted in December 2008 indicated that the measures within the new BO are significantly more restrictive than the Wanger Decision and would consequently further reduce exports from the Delta (i.e. further decrease reliability of the SWP). In addition, the California Department of Fish and Game Commission has since issued an Incidental Take Permit for longfin smelt that contains operational actions and the National Marine Fisheries Service has issued a new BO for Salmon that contains additional export limitations. Both of these permits could further reduce SWP reliability.

Preliminary modeling from DWR addressing the affects of the recently released Delta Smelt BO does indicate that additional significant reductions to SWP reliability are possible. Modeling results from DWR that take into account all recent actions that will further restrict the ability to export from the Delta and consequently reduce SWP reliability will not be available until the 2009 State Water Project Delivery Reliability Report is available, currently anticipated in the fall of 2009. This report may conclude that SWP reliability may decrease even further. The Perris Dam Remediation Program would not affect, or be affected by SWP reliability.

2.2.2 Perris Dam and Reservoir

Perris Dam and Reservoir, a multi-purpose facility known collectively as Lake Perris, is located within the Lake Perris State Recreation Area (SRA). **Figure 2-2** shows the regional location of the Lake Perris SRA. Perris Dam is an earthfill embankment completed in 1972, containing approximately 25 million cubic yards of compacted fill. The embankment is approximately 11,600 feet long, with a maximum structural height of 128 feet. The fill material was originally obtained from sediments in what was to become the lake bed, from clay borrow northeast of the lake, and from a quarry constructed within the Bernasconi Hills just east of the dam within the Lake Perris SRA.

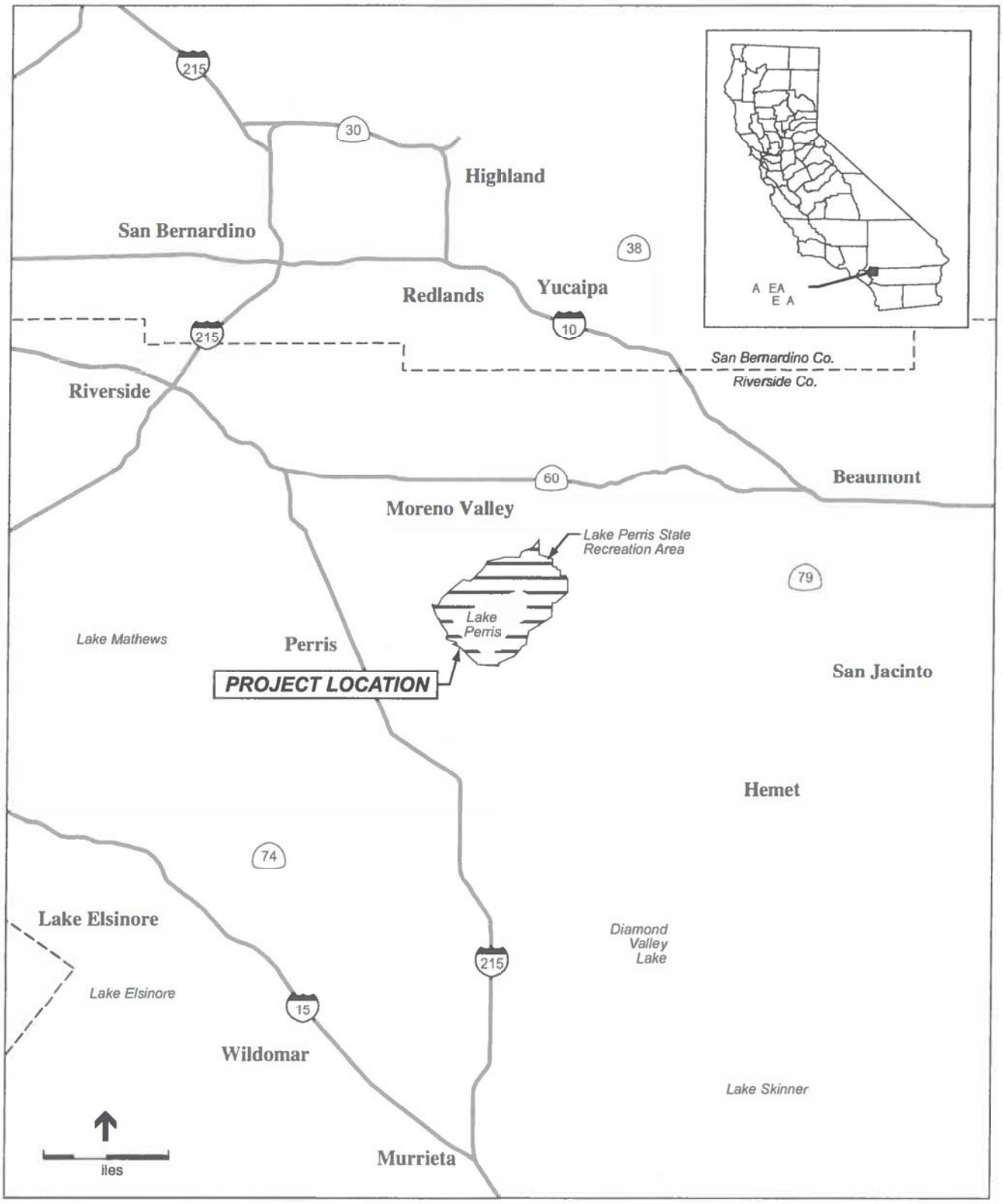


Figure 2-2 shows the regional location of the Lake Perris SRA

While DWR may vary the water surface elevation to provide for operational requirements, the normal maximum operating water level on the lake is 1588 feet above mean sea level (amsl), 108 feet above reservoir bottom. The spillway crest is 1590 feet amsl and the dam crest elevation is at 1600 feet amsl. The designed reservoir capacity is 131,000 acre-feet (af) with a surface area of 2,320 acres.

Though primarily a water supply reservoir, recreational and fish and wildlife enhancement opportunities consistent with the water supply uses were considered during original construction and extended to the California Department of Parks and Recreation (DPR) and the California Department of Fish and Game (CDFG). The lake provides water supply, recreation, sport fishery, wildlife enhancement, emergency water storage uses, and incidental flood protection. Recreation opportunities include fishing, hunting, boating, picnicking, camping, nature study, rock climbing, horse back riding, and hiking.

Resources Agency Order No. 6, dated March 13, 1963, defines the responsibilities of each department at SWP multi-purpose facilities pursuant to Water Code Sections 11900-11925, also known as the Davis-Dolwig Act. The water storage and conveyance facilities and acquired land are owned and operated by DWR in cooperation with MWD of Southern California, Coachella Valley Water District, and Desert Water Agency. DPR and CDFG, whose use is subordinate to the water supply project purpose, are responsible for the management, operation, and maintenance of the public recreation areas.

2.2.3 Need for the Project

Perris Dam Remediation

The seismic stability of Perris Dam has been evaluated since its design in the 1960s and construction in the 1970s. Results of the earlier studies indicated that the strain potential on the dam during intense ground shaking caused by seismic events was relatively low. The initial foundation studies were considered adequate by the standards of practice during the design phase in the late-1960s and early-1970s. However significant advances in soil liquefaction engineering including soil sampling and testing methods have resulted in a different interpretation of the foundation conditions and predicted performance.

In 2005, DWR completed a foundation study of the Perris Dam. Results of the detailed liquefaction analysis of the Perris Dam foundation indicated that seismically-induced ground shaking could result in embankment deformations due to the liquefaction potential of sediments under the dam at several locations along the 2300-foot-long segment along the southern span (left reach) of the dam. With the lake filled to its design capacity, this could result in overtopping of the dam during a strong ground shaking event. Based on the results of this stability analysis, DWR lowered the reservoir water surface elevation by 25 feet to 1563 feet amsl, until a long-term remedial solution can be implemented. This reduction in surface elevation reduced the storage capacity of the lake by approximately 40 percent from 126,841 af to 72,000 af.

The foundation study also concluded that the presence of loose sands beneath the dam embankment at the right abutment should be further investigated. Subsequent investigation by DWR concluded that excavation and replacement of a small portion of the dam is warranted. This work extends as deep as Elevation 1574 (11 feet above the maximum lake level during the drawdown period). It is anticipated that approximately 15,000 cubic yards (cy) of dam material and underlying loose silty sand would be excavated and recompacted. The excavated clay core and silty sand shells of the dam would be reused, and a relatively small amount of imported clay (up to 4000 cy) would be needed to rebuild this portion of the dam.

A Perris Dam Reconnaissance Study was conducted in 2006 to evaluate alternatives to the dam remediation. Alternatives evaluated in the Reconnaissance Study included permanently lowering the lake level, maintaining the existing level, and raising the normal maximum operating level of the reservoir. The report recommended that restoring the lake to historical operating levels had the least impact.

Remediation of the dam foundation would encounter some below-grade drainage structures and monitoring wells that either would have to be destroyed or replaced. This includes some of the relief wells and other portions of the seepage collection system. The relief wells along the left reach would be destroyed by overdrilling and backfilling with cement-bentonite grout. They would be replaced by new relief wells. The perforated pipes in the toe drain of the dam and in the drain line connecting the relief wells are likely made of asbestos cement pipe. These drainage elements would be removed as part of the excavation at the toe of the dam. The new toe drain (12-inch perforated PVC or HDPE pipe) would be placed at the toe of the new berm to replace the toe drain (12-inch perforated asbestos-containing pipe) excavated from the toe of the dam. The length of the toe drain pipe would be up to 5200 feet. Similarly, up to 4000 feet of 12-inch perforated ACP would be removed from the line of relief wells and replaced with perforated PVC or HDPE as part of the new relief wells. The 1500 feet of existing 24-inch solid ACP that drains seepage water from the toe drain and relief wells to the flow meter near Ramona Expressway would also be replaced as it interferes with construction of both the dam foundation remediation and the emergency outlet conveyance construction. Finally, shallow irrigation lines may exist in the project area that were abandoned prior to construction of the dam. These abandoned water delivery pipes would be removed where encountered and capped if necessary.

Outlet Tower Replacement

The existing outlet tower, built in the early 1970s, is a 105-foot tall, freestanding structure constructed in the lake near the left abutment of the dam. The outlet tower contains 10 hydraulically operated 72-inch butterfly valves located at each of five equally spaced levels between Elevation 1503 and 1567 with two valves at each location. The tower was constructed of reinforced concrete and is circular in cross section with an inside diameter of 26 feet and an outside diameter of 31 feet. The outlet tower releases water from five selected levels to a 150-inch (12.5 foot) diameter horizontal tunnel at its base. The function of the outlet facility is to convey water to MWD's delivery facility just southwest of the eastern abutment of the dam and

to have the ability to release water from the lake when required during emergencies for the safety of the dam.

The structural integrity of the tower was evaluated in 2006 and was found to be deficient in shear capacity under pre-2008 seismic loading which could cause a failure of the structure. To remediate the stability of the outlet tower, DWR evaluated options to either retrofit the existing outlet tower or construct a new facility on the shore near the current tower. Several potential alternatives were considered to retrofit the tower, but none were found to be viable to reinforce the structure, given complexities of construction with water in the reservoir, thus construction of a new tower is required.

Emergency Outlet Extension

When Perris Dam was initially constructed, there was little development between the dam and the Perris Valley Storm Drain. The dam's emergency release facilities were designed and constructed to release 3800 cubic feet per second (cfs) of water downstream of the dam, allowing the water to form its own overland channel, resulting in an inundation area of 2700 acres. Over time, the areas downstream of the dam were developed with residential land uses that could be affected should the emergency release be needed. The existing emergency outlet structure consists of a rectangular pipe (12 feet by 6 feet), slide gate, and bulkhead, capable of releasing a maximum of 3800 cfs. The new facility would be sized to accommodate up to 1500 cfs which is the current emergency drawdown capacity requirement set by the California Department of Safety of Dams for Lake Perris. Currently, water released from the dam in an emergency could flood downstream residents because there is no conveyance structure to contain or direct the emergency flows.

2.2.4 Project Objectives

The objectives of the proposed project are to:

- Upgrade SWP infrastructure to meet current seismic standards
- Maintain SWP delivery commitments
- Maintain maximum access to beneficial uses at Lake Perris SRA during period of drawdown while ensuring public safety during construction
- Maintain maximum amount of pre-drawdown riparian habitat at Lake Perris SRA during period of drawdown
- Minimize risks associated with seismic hazards
- Provide infrastructure for the implementation of a safe emergency drawdown
- Enhance and restore public safety
- Maximize beneficial use of Lake Perris SRA by restoring reservoir to pre-drawdown water levels
- Minimize environmental impacts

2.3 Project Location

Lake Perris is located between the cities of Moreno Valley and Perris in an unincorporated area of Riverside County, approximately 15 miles south of the City of Riverside and 65 miles east of the City of Los Angeles (see Figure 2-2).

2.4 Baseline Condition

CEQA states that a project's potential impacts should be assessed against the existing baseline condition at the time the NOP is published (§15125). However, for purposes of this project, the baseline condition is assumed to be the pre-drawdown condition that was present in spring of 2005, before DWR implemented the 25 foot water level drawdown in the reservoir. The drawdown was conducted as an emergency public safety action and was identified as such in a CEQA Categorical Exemption filed by DWR in August 2005. For purposes of this EIR, the drawdown of the lake from an elevation of 1588 feet amsl to the current elevation of 1563 feet amsl, and subsequent improvements implemented by DWR to the facilities at the Lake Perris SRA are considered to be part of the project description.

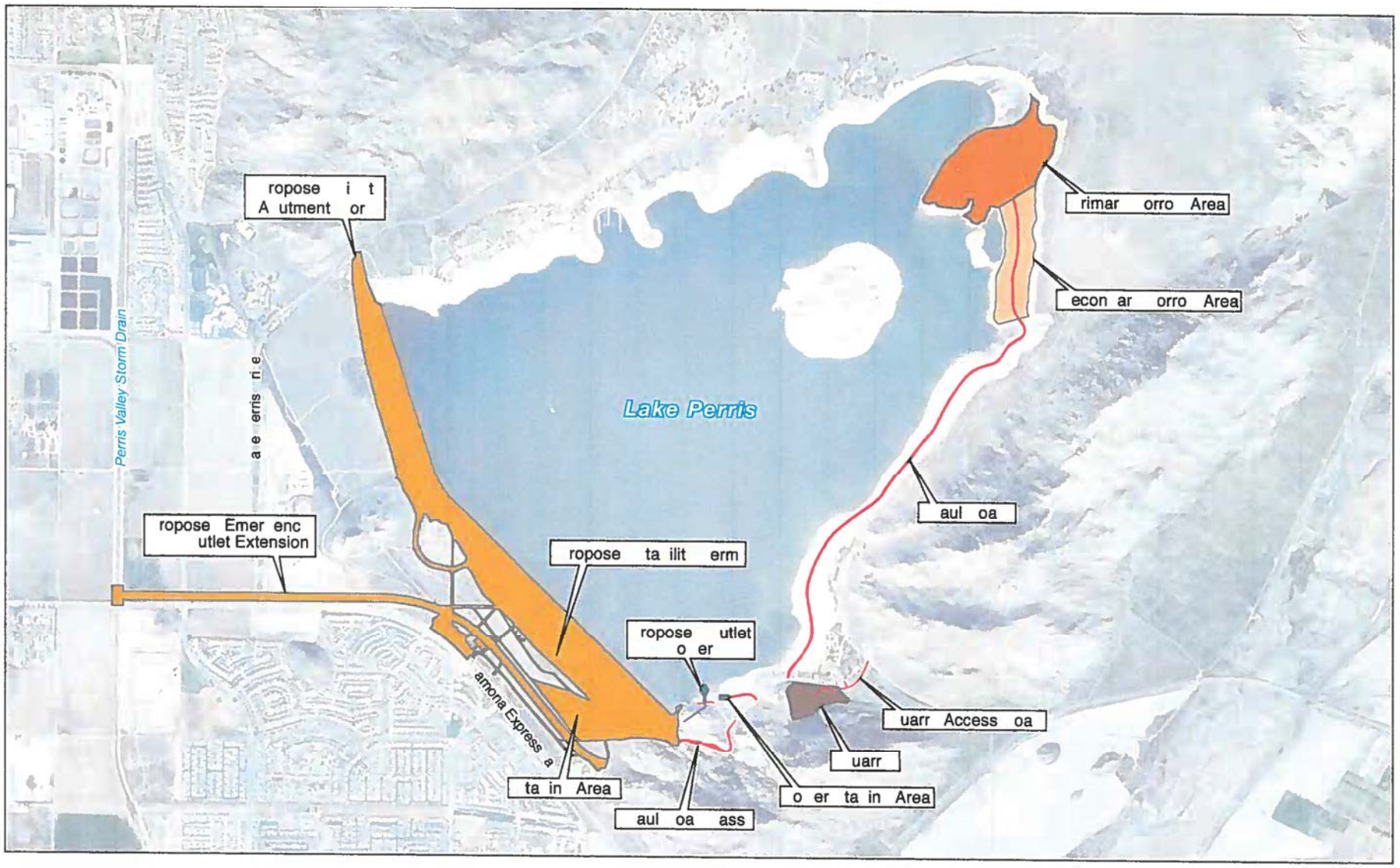
2.5 Project Description

In addition to the drawdown itself, the proposed Perris Dam Remediation Program includes three separate components as described below: (1) Perris Dam Remediation, (2) Outlet Tower Replacement, and (3) Emergency Outlet Extension. The three components combined provide the upgraded seismic protection needed to protect public safety. **Figure 2-3** shows the location of each of the proposed components. The following sections describe each component.

2.5.1 Lake Perris Drawdown

On August 2005, DWR initiated the drawdown of Lake Perris from 1588 feet amsl to 1563 feet amsl. The drawdown was complete by November 2005. The water removed from the lake was delivered to MWD for delivery or storage in other facilities. **Figure 2-4** shows the area of the lakebed exposed during this process. DWR conducted several actions to mitigate initial impacts of the drawdown. In an effort to maintain recreational activities on the lake, DWR ensured that the marina remained in the lowered lake and constructed a causeway from the shore across the exposed lakebed, providing full access to the marina facility. In addition, the Department of Boating and Waterways physically moved docks 60 feet further off-shore to improve vessel access to slips. New ADA[1]-compliant access ramps were restored to these docks by DWR to replace those which had become too steep due to the drawdown. DWR also imported 14,171 tons of sand to the Perris Beach area to enhance beach-going recreational uses near the location of the previous beaches. DWR also installed a 2-mile long irrigation system connected to State Park water pumps and drip-line system that conveys lake water to the riparian habitat that exists along the eastern edge of the original lakeshore. Figure 2-4 shows the location of the new beach, marina causeway, boat launch extensions, and irrigation system.

[1] American's with Disabilities Act (ADA)



SOURCE: GlobeXplorer, 2007; DWR, 2007; ESA, 2009.

DWR - Perris Dam Remediation Program . 206008.02

Figure 2-3
Location of Proposed Project Elements

DWR001140

SOURCE: GlobeXplorer, 2007; DWR, 2007; ESA, 2007.

DWR - Perris Dam Remediation Program . 206008.02

Figure 2-4
Post-Drawdown Improvements

DWR001141

2.5.2 Perris Dam Remediation

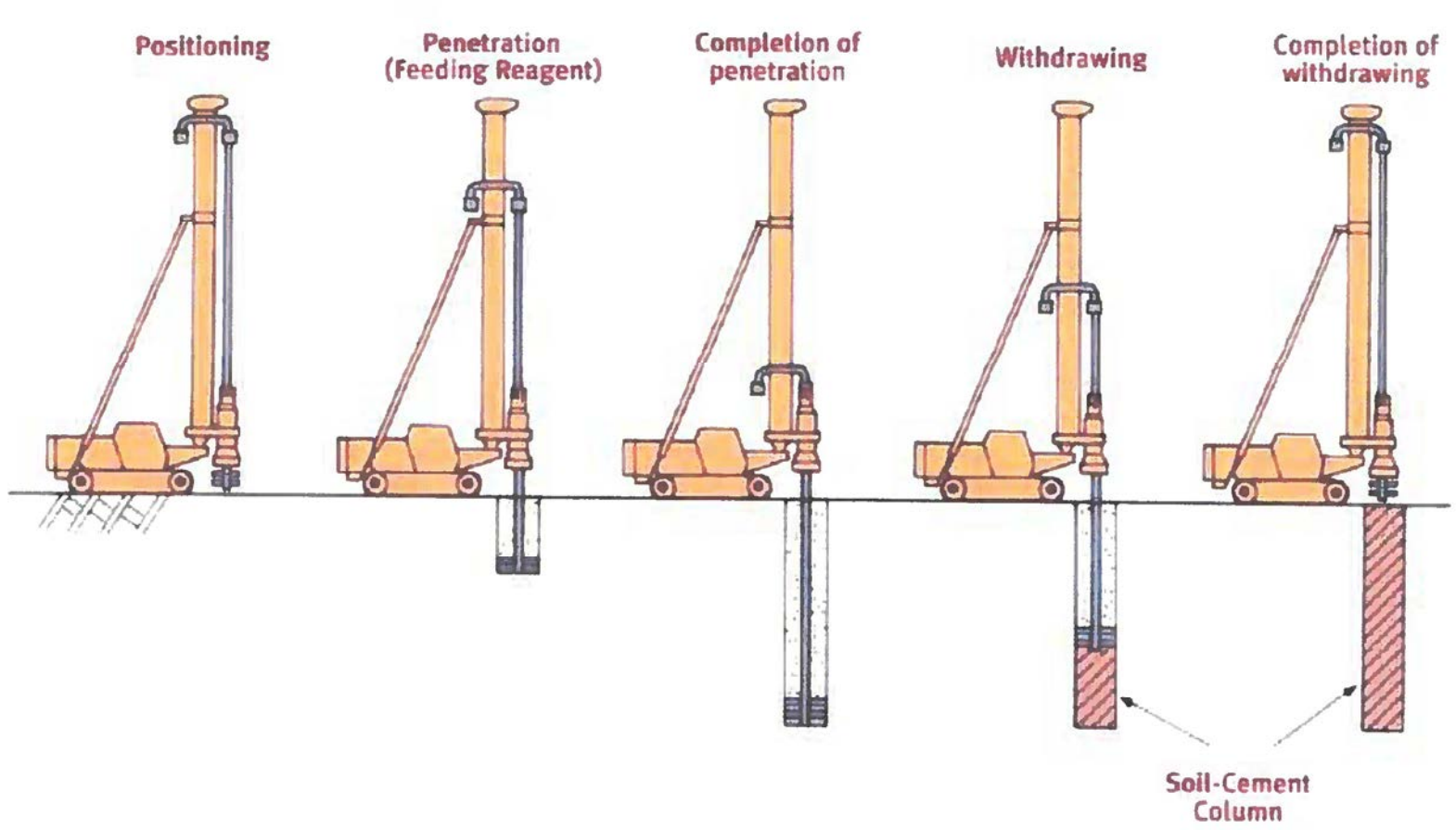
DWR proposes to seismically upgrade the dam by improving the foundation material with cement-deep-soil-mixing (CDSM) methods, excavating the toe of the dam to remove the liquefiable berm foundation material, replacing the berm foundation material with re-compacted engineered fill, and then constructing a stability berm on top of the replaced berm foundation. This remediation strategy would allow Lake Perris to return to its previous maximum operating pool elevation of 1588 feet amsl after construction.

CDSM methods involve thoroughly mixing cement paste with in-situ native soils within a zone from approximately 60 feet below original grade at the downstream toe of the dam. The blocks of soil-cement columns would be installed in the deepest and most liquefiable alluvial materials beneath the berm foundation. Deep soil mixing increases the stability of the soil and reduces liquefaction hazards as well as temporary destabilization caused by excavations at the toe. **Figure 2-5** presents a schematic view of CDSM techniques.

Following deep soil mixing, the groundwater would be lowered by an array of pumping wells and either temporary sheet piles or a permanent CDSM wall to facilitate the excavation and replacement of the uppermost liquefiable soils. The current seepage collection system is fed by gravity and is comprised of a drainage blanket, toe drain collector pipe, relief wells, relief well collector pipe, one large diameter well and a main drain line that leads to the flow meter. The new seepage collection system would serve essentially the same purpose. New relief wells and collector piping would be installed to prevent ponding of seepage water on the ground surface once the lake level is returned to its original elevation. The wells and the extended drainage blanket would maintain a stable groundwater elevation south of the dam. The water pumped from the wells during construction would discharge into a solid pipe leading out to the flow meter and on toward MWD's delivery system. After construction, gravity drainage from the extended drainage blanket and the new wells would also flow through the existing flow meter on toward MWD's system.

Approximately 700,000 cy of soil would be excavated from the shallow berm foundation at the toe of the dam. **Figure 2-6** provides a cross-section of the proposed excavation. Drain rock would be placed in the bottom lifts of the excavation to extend the existing drainage blanket to the new toe of the stability berm. The excavated material would be stockpiled on site and recompacted as excavation backfill and as part of the stability berm. Approximately 800,000 tons of drain rock and 300,000 cy of soil would be backfilled into the excavation area.

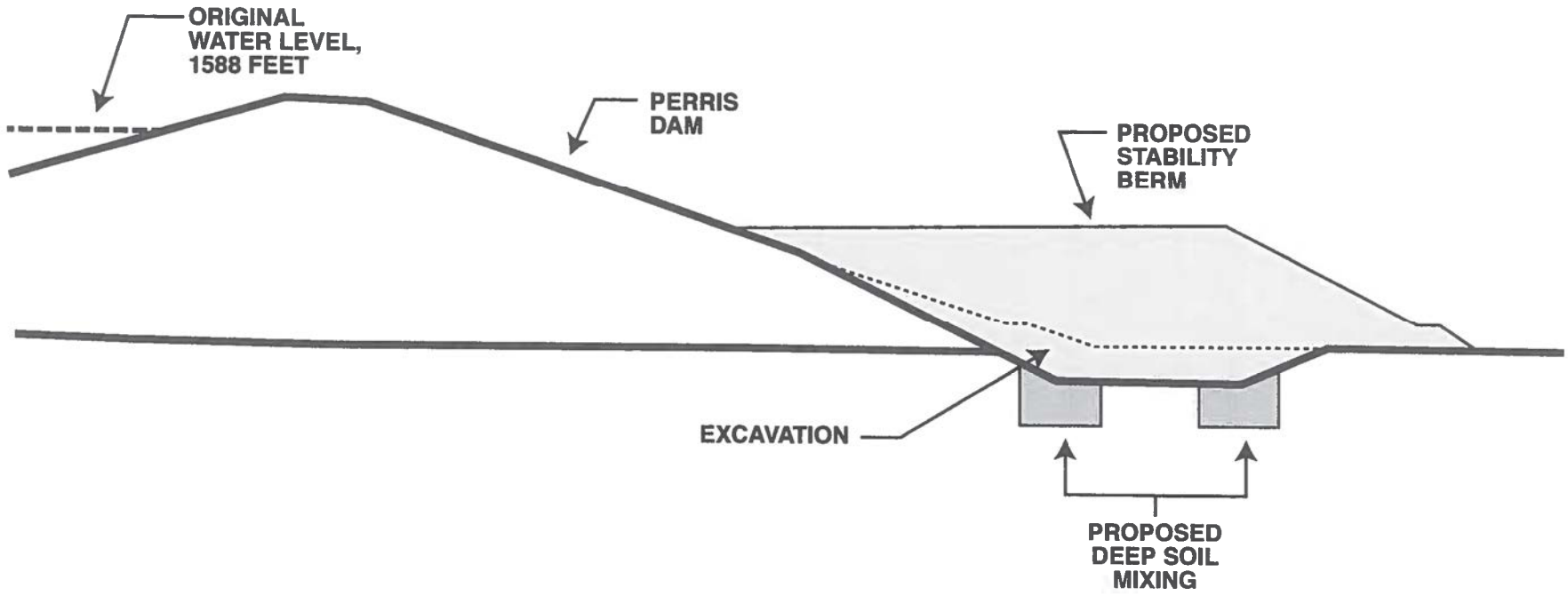
A stability berm would be constructed atop the re-compacted berm foundation along the downstream toe of the dam as shown schematically in **Figure 2-7**. The berm would consist of approximately 1.75 million cubic yards of soil and one million tons of rock. As shown in Figure 2-3, the soil for the stability berm would be excavated from within the lakebed at the east end of the lake, and the rock would be quarried from the original rock quarry east of the lake in Bernasconi Hills. To convey the soil and rock to the downstream face of the dam, a haul road would be constructed from the east side of the lake, along the lakebed on the south side of the



SOURCE: Courtesy of Raito, Inc.

DWR - Perris Dam Remediation Program . 206008.02

Figure 2-5
Cement Deep Soil Mixing



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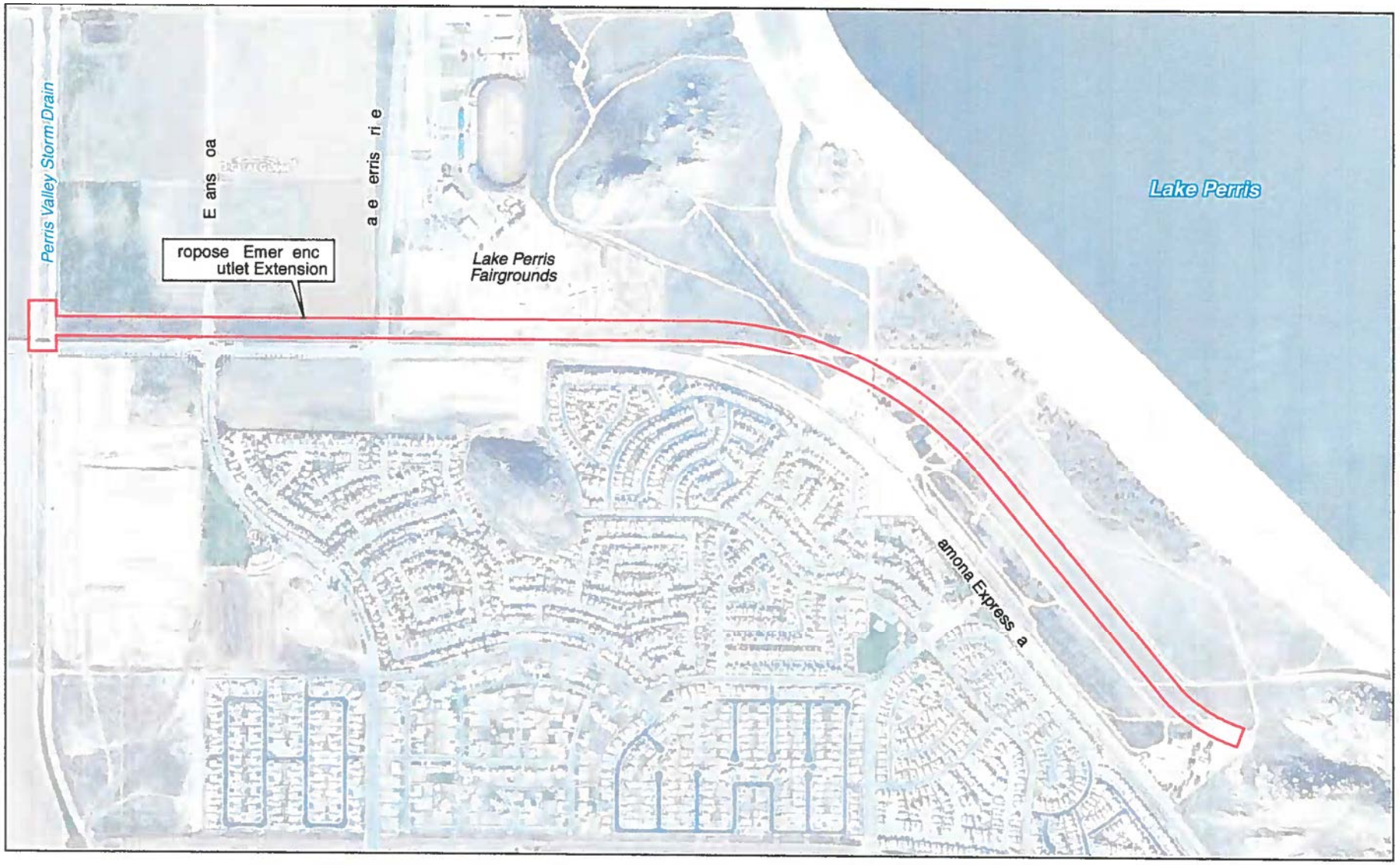


SOURCE: GlobeXplorer, 2008; DWR, 2009; ESA, 2009.

DWR - Perris Dam Remediation Program . 206008.02

Figure 2-7
Emergency Outlet Extension

DWR001145

lake, and over a low spot on the Bernasconi Hills near the dam's left abutment. Figure 2-3 and **Figure 2-8** show the proposed route for the haul road.

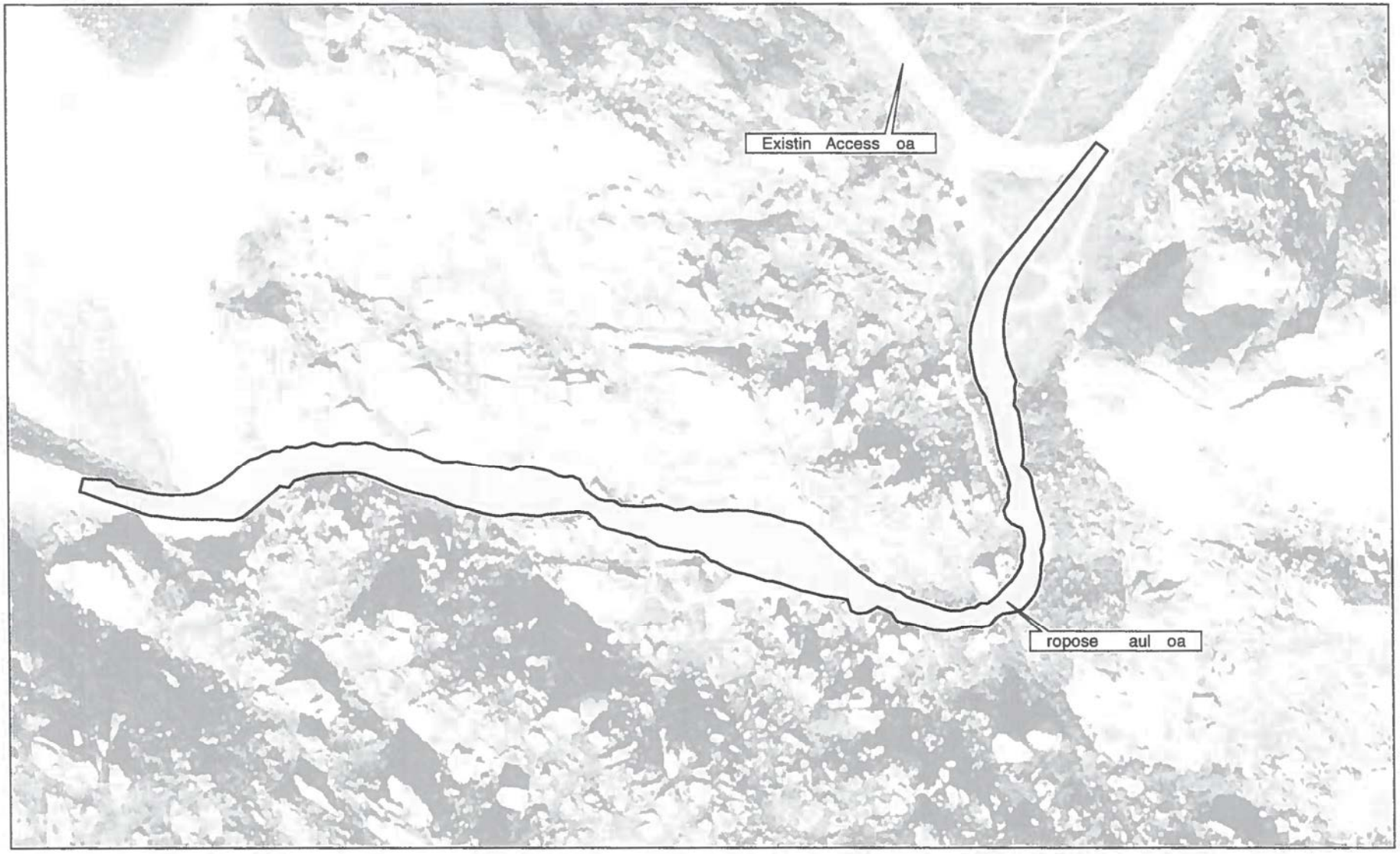
Soil and rock hauled to the toe of the dam may be stockpiled near the construction area or applied directly to the construction activity as they are quarried and delivered. **Figure 2-9** shows the construction zone including staging areas.

The borrow area would be located entirely within the lakebed exposed by the temporary drawdown. Similarly, the haul road would be constructed entirely within the exposed lakebed from the borrow area to just south of the dam. As shown in Figure 2-8, the haul road would continue over a portion of the Bernasconi Hills to the downstream side of the dam. The haul road in this location would require blasting and become a permanent, paved maintenance road at the end of construction. The borrow area and remaining portions of the haul road would be submerged when the lake is refilled.

2.5.3 Outlet Tower Replacement

DWR is proposing to construct a new outlet structure as a replacement facility, because the existing tower may fail during a major earthquake. The new outlet facility would be located approximately 400 feet from the existing tower. An area on the southern shore between the hill and the lake would be excavated and the new outlet tower constructed using dry construction methods (**Figure 2-10**). Excavated material would be hauled to the dam remediation construction area and used in the stability berm. Blasting into hard rock would be required.

The new facility would consist of a tower extending from the dead pool elevation of 1500 feet of the lake to an elevation of 1600 feet amsl, approximately 12 feet above the lake level when full. Appurtenant structures on top of the tower would extend an additional 20 feet above ground level. The facility would be constructed within the excavation. A 600-foot long, 12.5-foot diameter tunnel would be constructed to connect the new outlet facility to the existing underground tunnel that connects to MWD's delivery system. A staging area would be needed near the construction area, as shown on Figure 2-10, to stockpile construction material and equipment. Once the new outlet structure and the tunnel are constructed, a 300-foot long approach channel would be constructed to open the new outlet to the lake. A buoy line would be set in the lake approximately 300 feet from the shore limiting access to the vicinity of the facility. The old outlet tower would remain in place and would not be deconstructed.



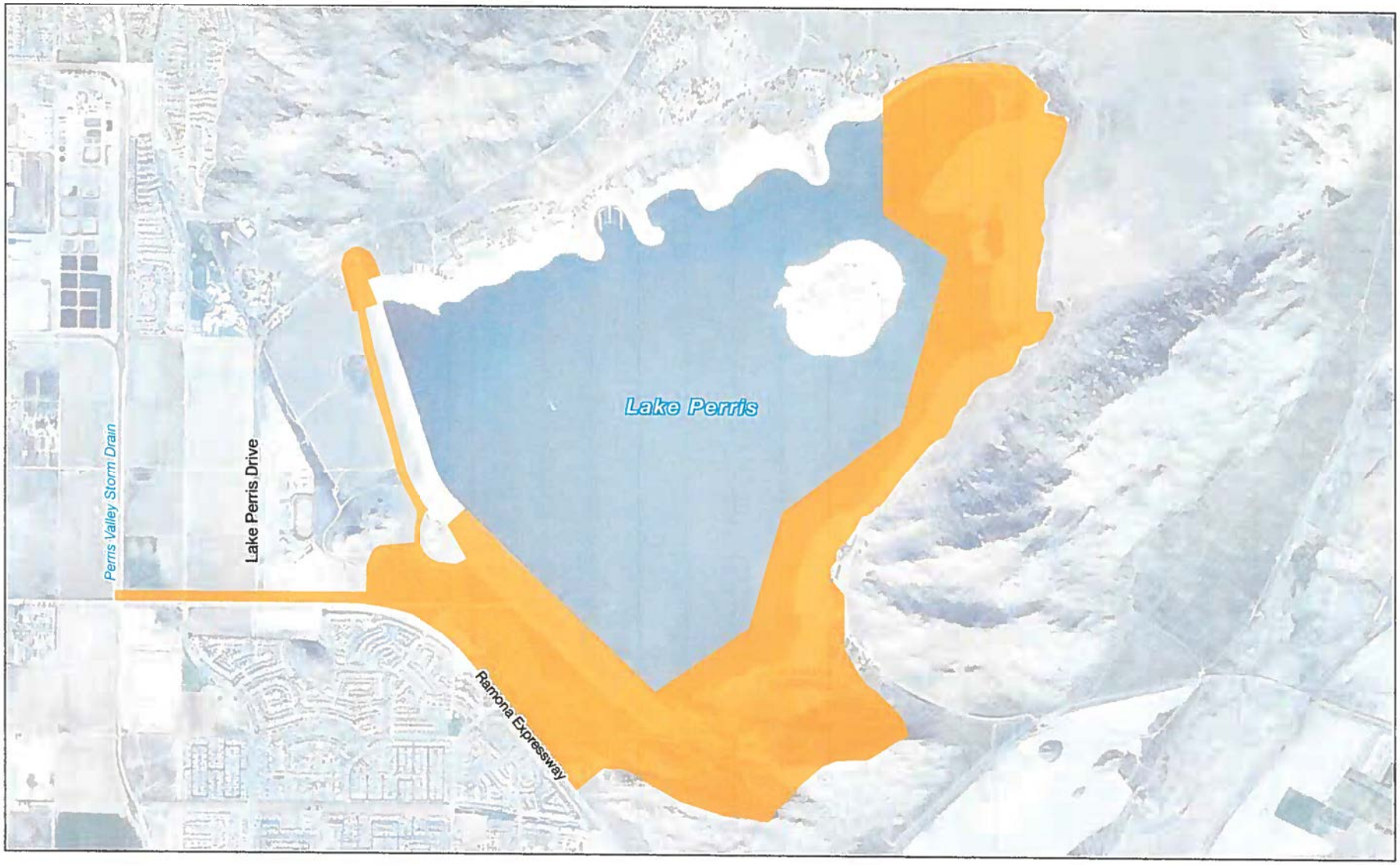
SOURCE: DWR, 2009; ESA, 2009.

DWR - Perris Dam Remediation Program . 206008.02

Figure 2-8

Haul Road over Bernasconi Hills

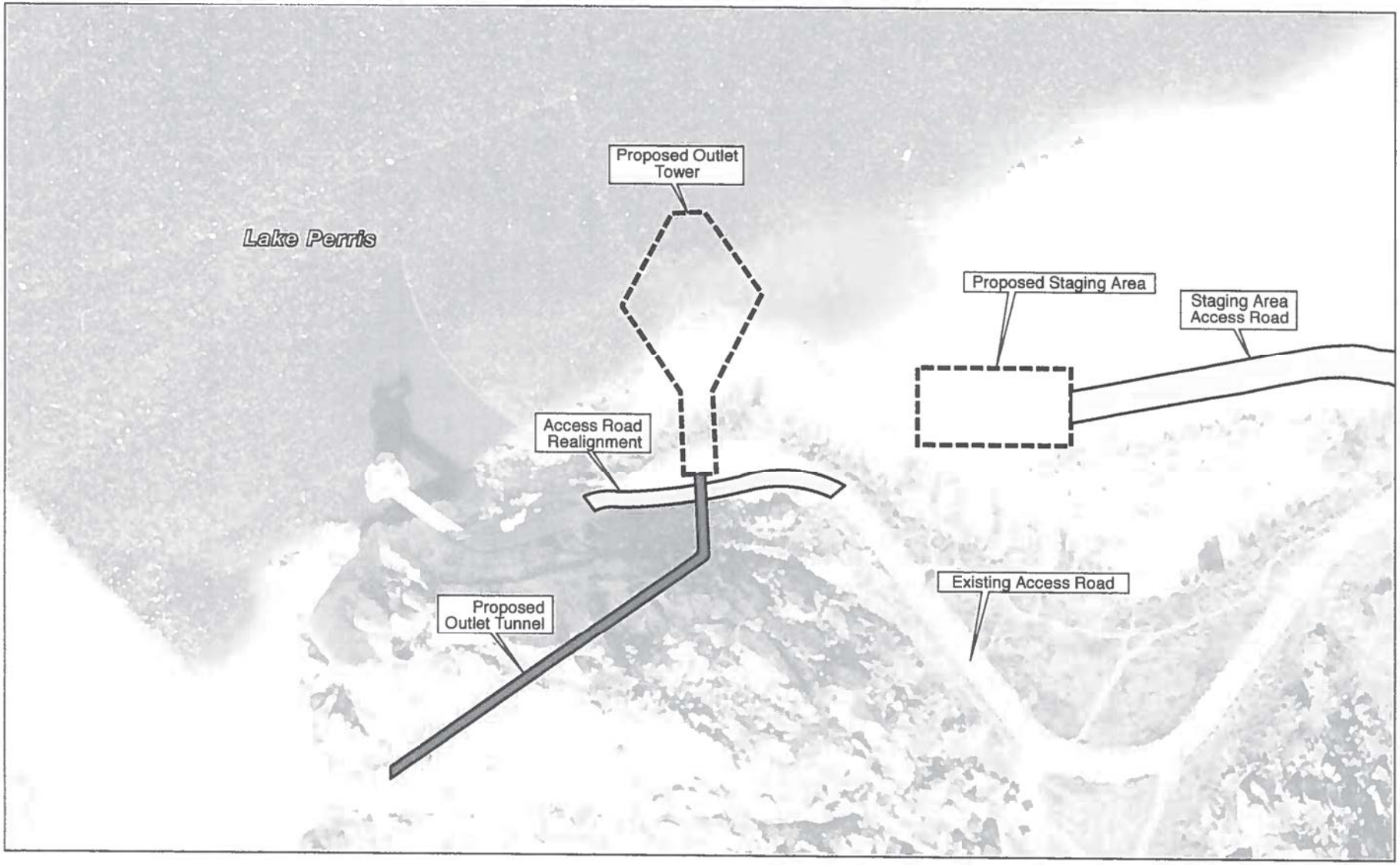
DWR001147



SOURCE: GlobeXplorer, 2007; DWR, 2007; ESA, 2009.

DWR - Perris Dam Remediation Program . 206008.02

Figure 2-9
Approximate Exclusion Zone
Off limits to Public
During Construction
DWR001148



SOURCE: GlobeXplorer, 2007; DWR, 2007; ESA, 2009.

DWR - Perris Dam Remediation Program . 206008.02

Figure 2-10
Proposed Outlet Tower
New Structure Location Plan

DWR001149

2.5.4 Emergency Outlet Extension

DWR is proposing to modify the existing valve and control systems to reduce emergency releases to a maximum 1500 cfs. DWR would also construct a new emergency outlet extension in the form of a conveyance that would completely contain and convey the maximum release from the dam to the Perris Valley Storm Drain. Figure 2-7 identifies the proposed route of the emergency outlet extension.

The proposed outlet extension would be approximately two miles long with a 1500 cfs capacity to the Perris Valley Storm Drain. There are two alternatives for the outlet extension being addressed. The first alternative would be underground as either a box culvert or pipeline from the existing outlet structure to Lake Perris Drive. The remaining portion of the conveyance channel from Lake Perris Drive to the Perris Valley Storm Drain, would either continue as an underground conveyance or transition to an unlined, open trapezoidal channel. This segment would be approximately 2700-feet long and would parallel Ramona Expressway and terminate at the Perris Valley Storm Drain. A 20-foot wide service road would run parallel to the conveyance channel. The maximum total affected width along the underground segment would be 110-feet. The maximum total affected width for the open channel option would be 160-feet including the service road. At the conjoining of the emergency outlet extension and the Perris Valley Storm Drain, a velocity dissipater structure would be constructed as a below-grade concrete vault.

The second alternative would be an unlined, open trapezoidal channel for the entire length of the outlet extension. A 20-foot wide service road would run parallel to the conveyance channel. The maximum total affected width for the open channel would be 160-feet including the service road. At the conjoining of the emergency outlet extension and the Perris Valley Storm Drain, a velocity dissipater structure would be constructed as a below-grade concrete vault.

The alignment crosses MWD's buried 10-foot diameter pipe just southwest of the existing outlet structure. The conveyance would cross over MWD's pipeline at this location. The underground conveyance alternative would be approximately six feet higher than the surrounding ground level, creating a small hill covered with soil. The open conveyance alternative would require approximately 300 feet of canal to be lined with concrete to prevent erosion near the pipeline. The length of the concrete is due to the skew orientation of the canal and pipeline alignments.

The alignment crosses three roads which run perpendicular to Ramona Expressway: Fair Way, Lake Perris Drive, and Evans Road. These roads would experience lane closures during the construction of the emergency outlet extension, but no full road closures would be necessary. Each road crossing would be restored after construction and would pass over the underground conveyance. If the segment between Lake Perris Drive to the Perris Valley Storm Drain is to be a trapezoidal open channel, then reinforced concrete box culverts would be placed at the Evans Road crossing. A reinforced concrete box culvert would also be used to pass flow into the Perris Valley Storm Drain. Riprap would be placed on the upstream and downstream slopes of the Perris Valley Storm Drain to reduce localized scour.

ATTACHMENT: B

STATE OF CALIFORNIA—RESOURCES AGENCY

EDMUND G. BROWN JR., Govern

DEPARTMENT OF WATER RESOURCES

P. O. BOX 388
SACRAMENTO
95802

(916) 445-9248

ORIGINAL LETTER
RETURN TO GENERAL FILES

REFERRED TO	DATE
J. [illegible]	11-5-79
[illegible]	
Sent by File by	
LOG #	

OCT 31 1979

Mr. Evan L. Griffith
General Manager
The Metropolitan Water District
of Southern California
P. O. Box 54153
Los Angeles, CA 90054

Dear Griff:

Enclosed is the executed "Memorandum of Agreement Regarding Mitigation of State Water Project Wildlife Losses in Southern California".

We can now proceed with implementation of the provisions of the Agreement with the responsible parties.

Sincerely,

Ronald B. Robie
Director

Enclosure

cc: Mr. E. C. Fullerton, Director
Department of Fish and Game
1416 Ninth Street
Sacramento, CA 95814

save water

MEMORANDUM OF AGREEMENT REGARDING MITIGATION
OF STATE WATER PROJECT WILDLIFE LOSSES IN
SOUTHERN CALIFORNIA

This Memorandum of Agreement (hereinafter referred to as "MOA") is entered into this 23d day of October, 1979, by and between the State of California, acting by and through its Department of Water Resources (hereinafter referred to as "DWR"), the State of California, acting by and through its Department of Fish and Game (hereinafter referred to as "DFG"), and The Metropolitan Water District of Southern California (hereinafter referred to as "Metropolitan").

Recitals

1. In accordance with the requirements of the Davis-Dolwig Act obliging DWR to preserve wildlife impacted by the construction of the State Water Project (hereinafter referred to as "SWP"), DWR, DFG, and Metropolitan have explored mitigation measures that will satisfy the preservation obligations arising out of construction of the SWP facilities on lands formerly under private ownership in Southern California. As used in this MOA "Southern California" refers to that portion of California served by the SWP southerly of the A. D. Edmonston Pumping Plant.

2. This MOA outlines the provisions to be included in definitive agreements covering the various parcels of land, sums of money, and operating agreements to carry out the preservation obligations referred to in paragraph 1.

3. The parties agree that the responsibilities for "full and close coordination of * * * planning for the preservation and enhancement of * * * wildlife" with respect to federal agencies has been previously accomplished.

Substantive Provisions

4. DWR, DFG, and Metropolitan agree to exercise their best efforts to execute definitive agreements on substantially the terms outlined in this MOA.

5. The definitive agreements shall have a term expiring on the date of expiration of the contract between DWR and Metropolitan for a water supply dated November 4, 1960.

6. The following acreage of SWP lands in Southern California shall be designated and made available for wildlife mitigation purposes. Uses of these lands for other purposes will not be allowed if such use impinges upon the maintenance

of wildlife populations, except as needed for SWP operations. If DWR requires any of these lands for SWP operations, DWR will replace such lands taken with other lands acceptable to DFG.

a.	Lake Perris	800 acres
b.	San Jacinto borrow site	650 acres
c.	Bifurcation	50 acres
d.	Peace Valley and other west branch	1,533.5 acres
	TOTAL	3,033.5 acres

Such lands shall be located approximately as shown on the maps attached hereto as Exhibit 1.

Use of any portion of the above lands included in Federal Energy Regulatory Commission (FERC) License No. 2426 for wildlife mitigation purposes will be subject to the approval of FERC.

7. Metropolitan will dedicate at Lake Mathews for wildlife mitigation purposes approximately 2,565 acres. Uses of these lands for other purposes will not be allowed if such use impinges upon the maintenance of wildlife populations, except as needed for Metropolitan's operations. If Metropolitan requires any of these lands for its operations, Metropolitan, in cooperation with DWR, will replace such lands taken with other lands acceptable to DFG. Such lands shall be located approximately as shown on the map attached hereto as Exhibit 2.

DFG will prepare a plan conceptually describing the kinds and types of habitat development it anticipates carrying out on the Lake Mathews mitigation lands. These habitat development plans, if implemented, will be financed by DFG and implemented by Metropolitan. Any habitat development must be consistent with water quality standards and the operational functions of Lake Mathews as a water supply reservoir.

8. Metropolitan will carry out the operation and maintenance functions on the habitat developments undertaken by DFG on the 2,565 acres at Lake Mathews. The maximum operations and maintenance expenditure on the lands of Lake Mathews through the term of the definitive agreements, to be reimbursed by DWR, shall not exceed $500,000. After this amount has been expended, operations and maintenance costs will be reimbursed by DFG. Personnel of Metropolitan and DFG shall meet prior to each new year to develop an annual maintenance schedule. At the end of each year, Metropolitan will prepare an annual report on its operations and maintenance activities and related expenditures.

9. DWR will provide flows in Peace Valley Creek below Quail Lake in sufficient quantities to create and maintain a riparian corridor from the closest point to the California Aqueduct outlet at Quail Lake, to a point on Gorman Creek where proposed fish enhancement is to be made (approximately two miles in length).

10. The financial obligation of DWR to DFG shall be limited to the following:

a. An interest-bearing account with a one-time cash settlement of $5.5 million, to be provided by DWR, will be established to be used exclusively by DFG for wildlife mitigation purposes. DFG shall utilize these funds for the acquisition and improvement, of lands for wildlife mitigation purposes in the San Jacinto area, or for improving and maintaining wildlife habitat on the lands acquired or designated herein for wildlife purposes.

b. DWR also agrees to provide DFG $1.5 million in SWP funds to be reimbursed through the project-purpose allocation to recreation, fish and wildlife enhancement. These funds will be deposited in the interest-bearing account established pursuant to subparagraph a.

c. DWR will assign to DFG $0.5 million of its share of allocations from the Land and Water Conservation Fund.

d. DWR and DFG will cooperate in seeking an appropriation by the Legislature of $0.5 million from the funds allocated to DWR under the State, Urban, and Coastal Park Bond Act of 1976.

11. DFG shall be lead agency in complying with the provisions of the California Environmental Quality Act in implementing any wildlife mitigation features.

12. None of the parties shall be committed to take steps which require CEQA compliance until an opportunity has been provided them to consider and take such action as they, in their discretion, deem desirable based on any relevant CEQA documentation.

13. The definitive agreements shall be submitted by the parties to those agreements to all other interested non-federal agencies in such manner as to assure compliance with Section 11910 of the Water Code.

STATE OF CALIFORNIA
DEPARTMENT OF WATER RESOURCES

By _____
Director

STATE OF CALIFORNIA
DEPARTMENT OF FISH AND GAME

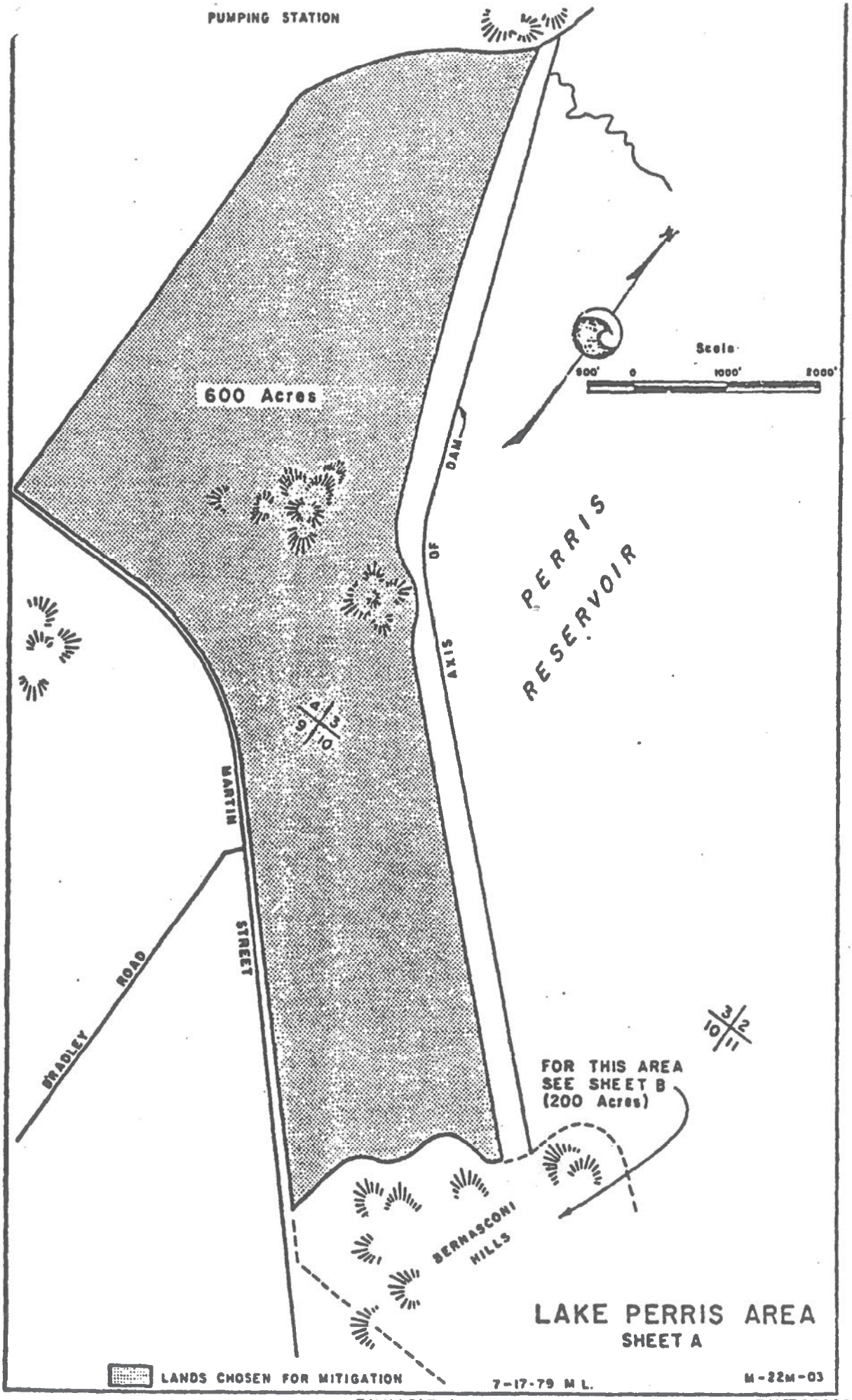
By COPY ORIGINAL SIGNED BY E. C. FULLERTON
Director

Approved as to legal form and sufficiency:

P.A. Towner
Chief Counsel, Department of Water Resources

THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA

By _____
General Manager


PUMPING STATION
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BERNASCONI
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LAKE PERRIS AREA
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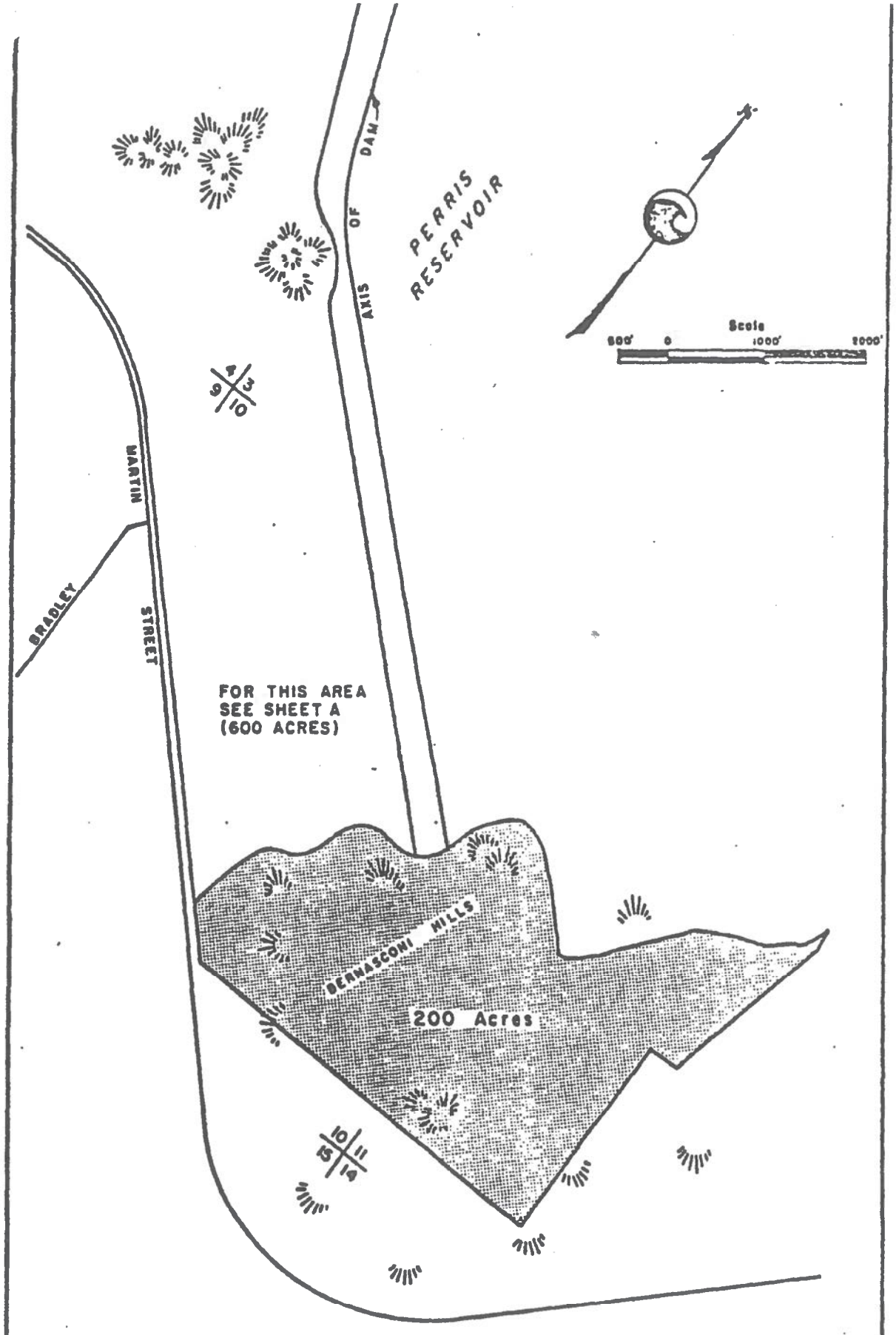
EXHIBIT I


PERRIS RESERVOIR
AXIS OF DAM
Scale
500' 0 1000' 2000'
MARTIN STREET
BRADLEY
FOR THIS AREA SEE SHEET A (600 ACRES)
BERNASCONI HILLS
200 Acres
LAKE PERRIS AREA
SHEET B
LANDS CHOSEN FOR MITIGATION
7-19-1979 M.L.
M-22N-04
EXHIBIT I
Sheet 2

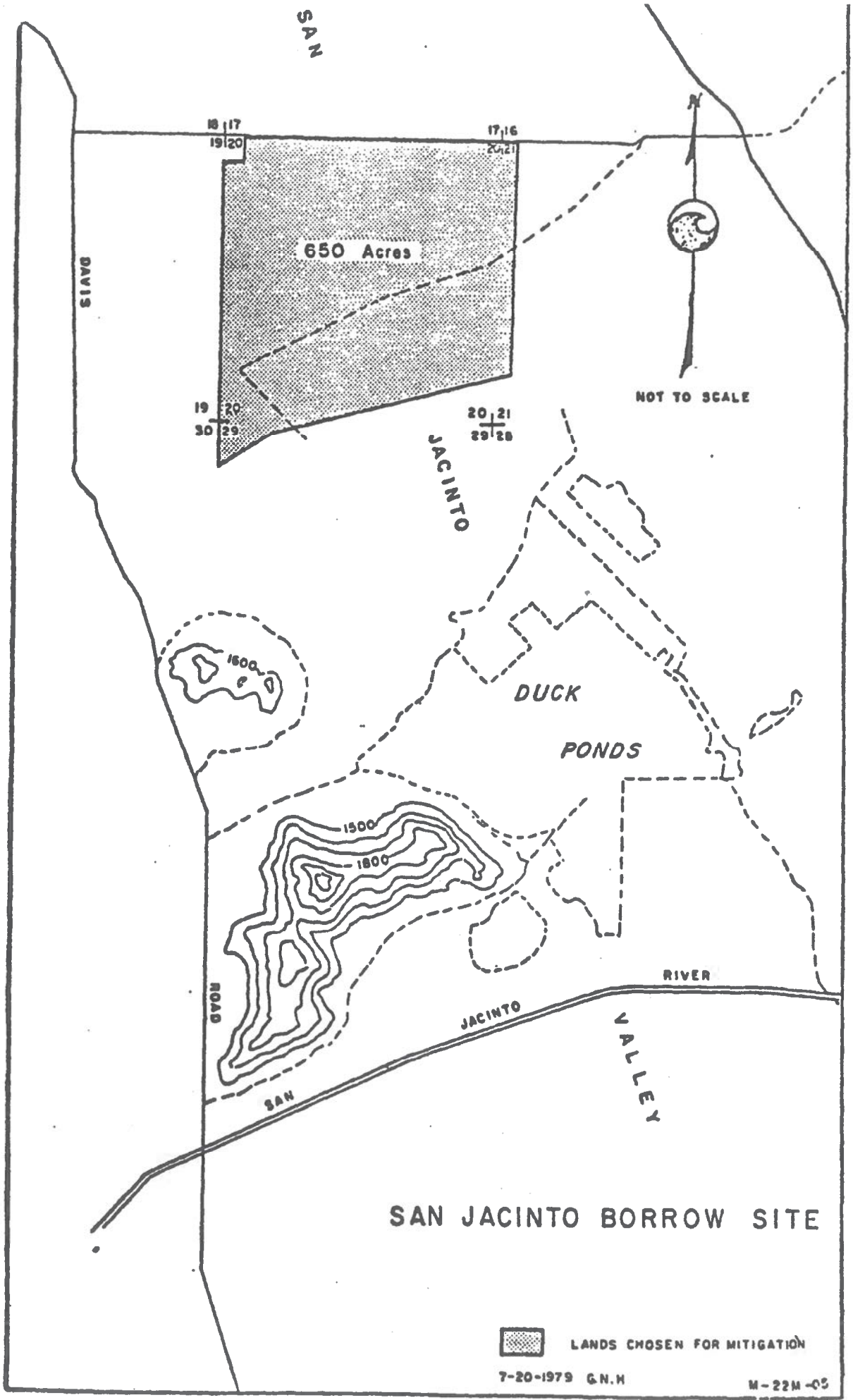

SAN
18 17
19 20
17 16
650 Acres
DAVIS
NOT TO SCALE
19 20
30 29
20 21
29 28
JACINTO
1600
DUCK
PONDS
1500
1800
ROAD
RIVER
JACINTO
VALLEY
SAN
SAN JACINTO BORROW SITE
LANDS CHOSEN FOR MITIGATION
7-20-1979 G.N.H
M-22M-05

EXHIBIT 1

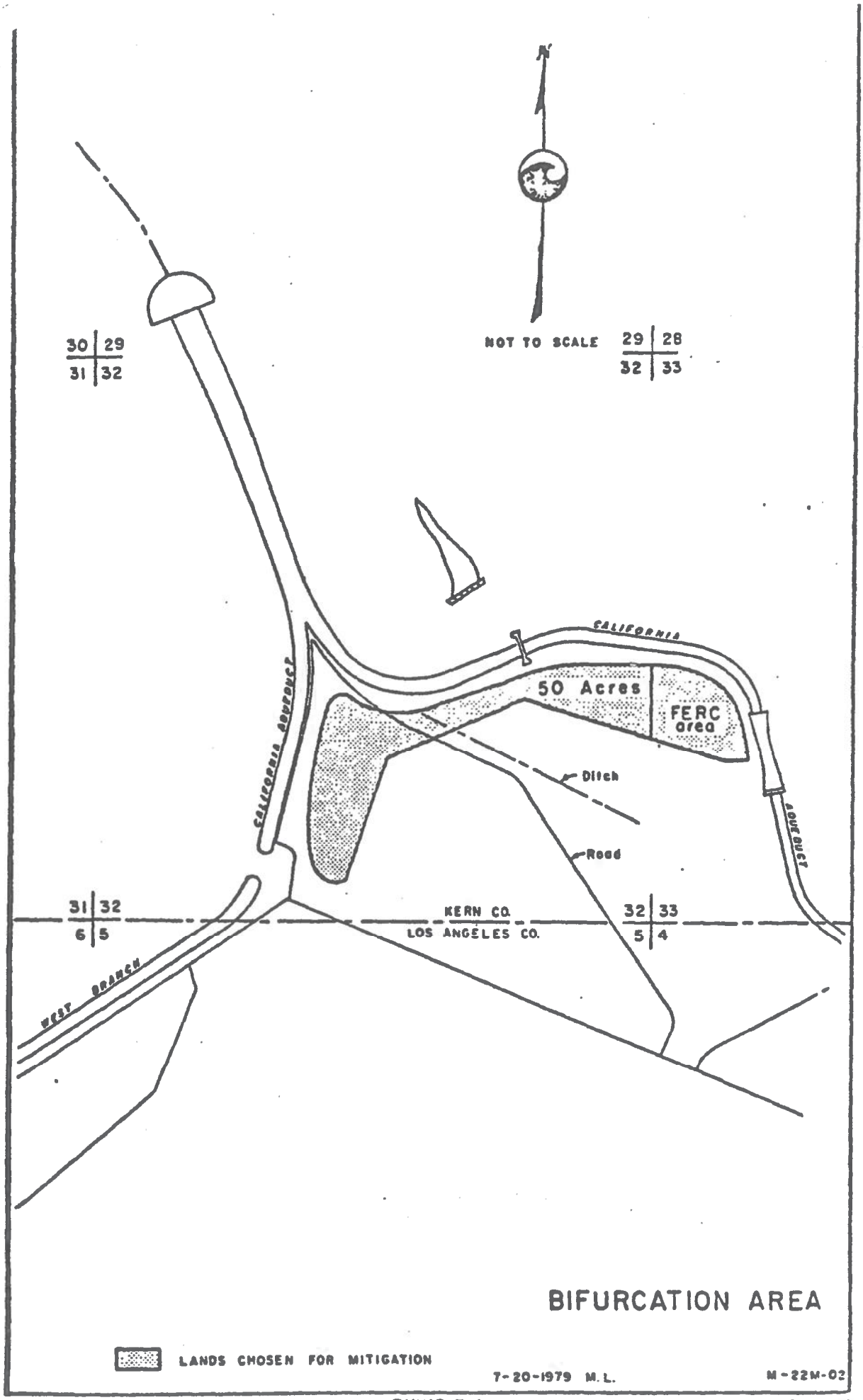
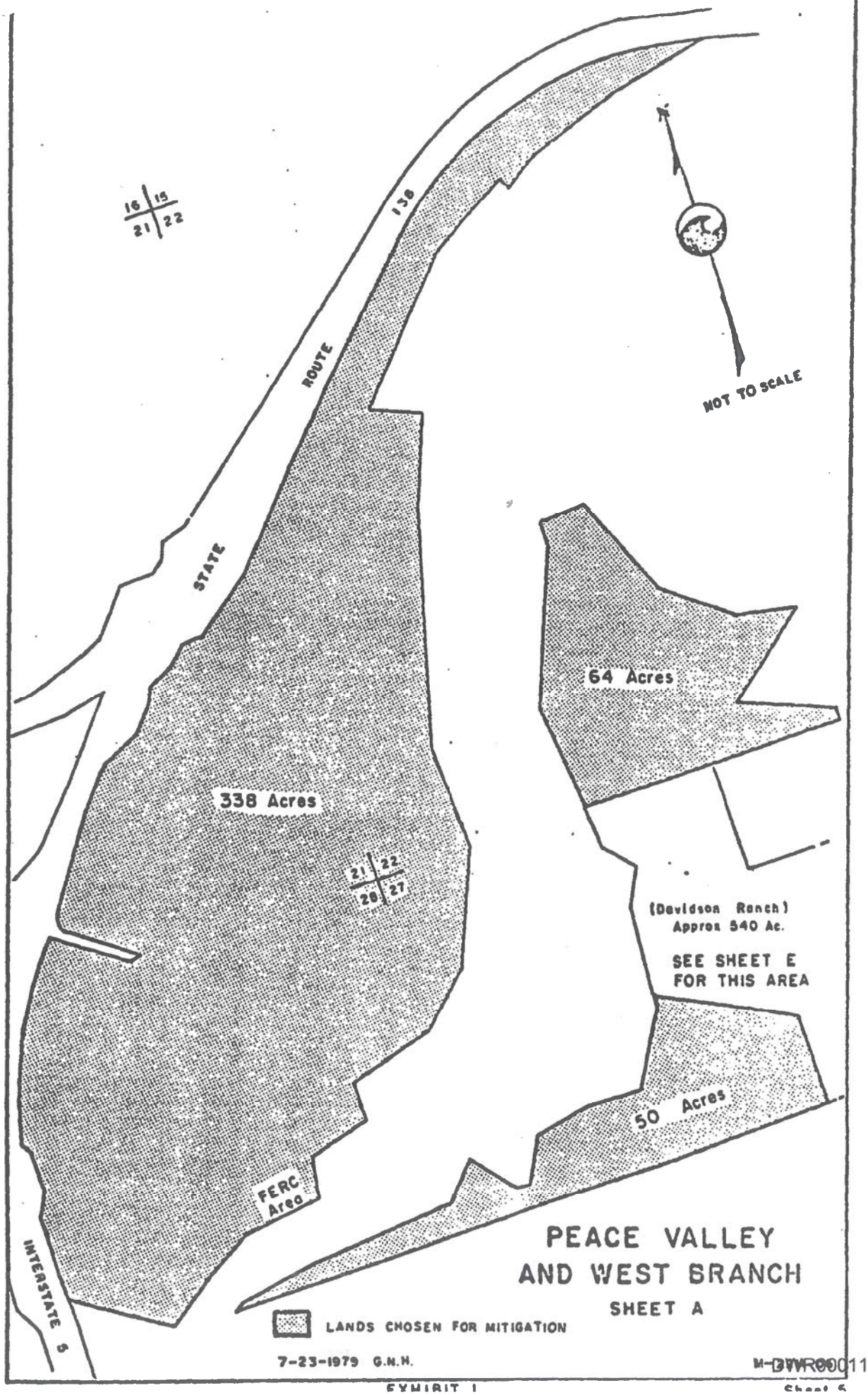


EXHIBIT I

Sheet 4

DWR000109

T6N, R16W SBM LOS ANGELES CO.



M-DWR000110

EXHIBIT 1

Sheet 6

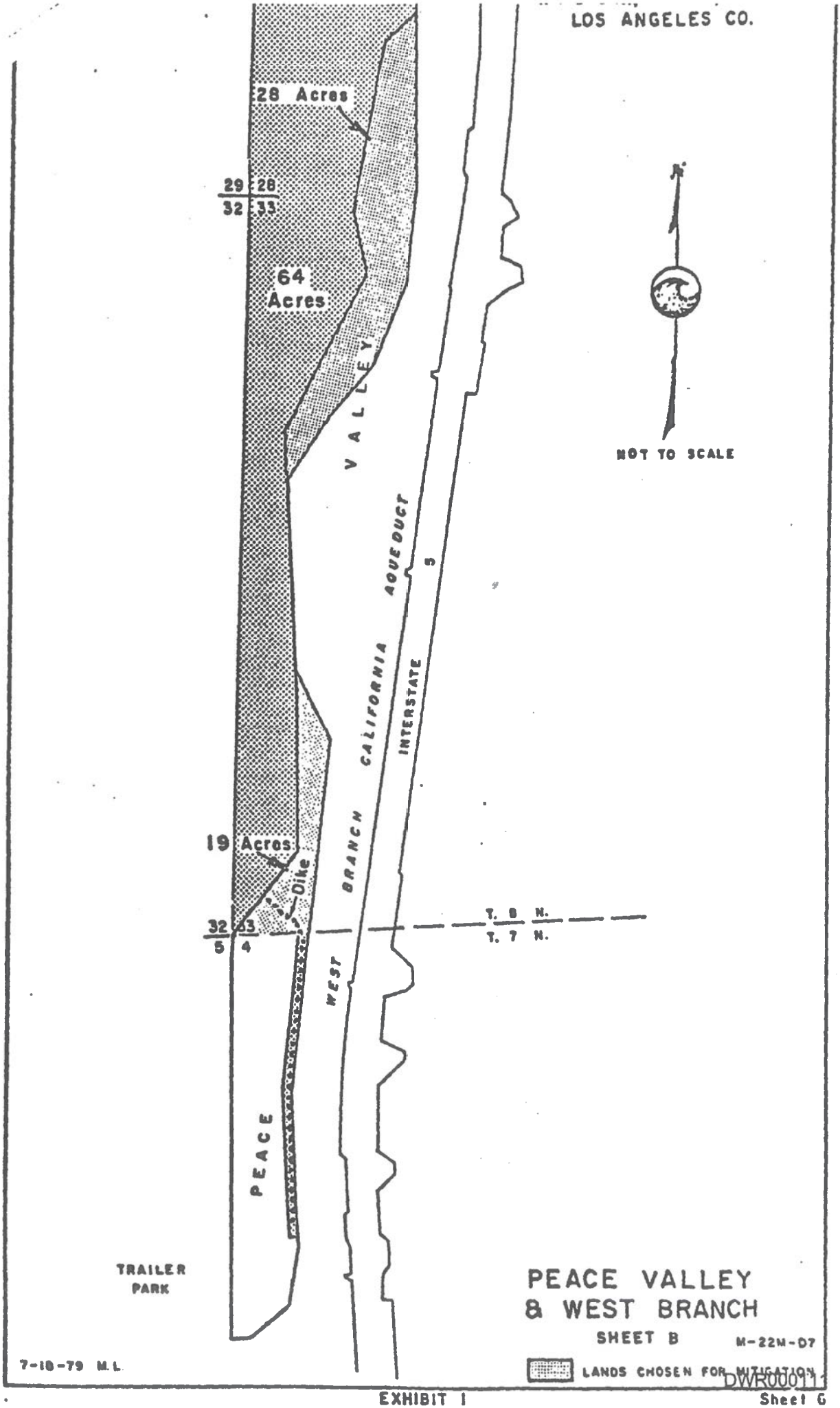

LOS ANGELES CO.
28 Acres
29 28
32 33
64 Acres
VALLEY
CALIFORNIA AQUEDUCT
INTERSTATE 5
NOT TO SCALE
19 Acres
Dike
32 33
5 4
T. 8 N.
T. 7 N.
WEST BRANCH
PEACE
TRAILER PARK
PEACE VALLEY
& WEST BRANCH
SHEET B
M-22M-D7
7-18-79 M.L.
LANDS CHOSEN FOR MITIGATION

EXHIBIT 1

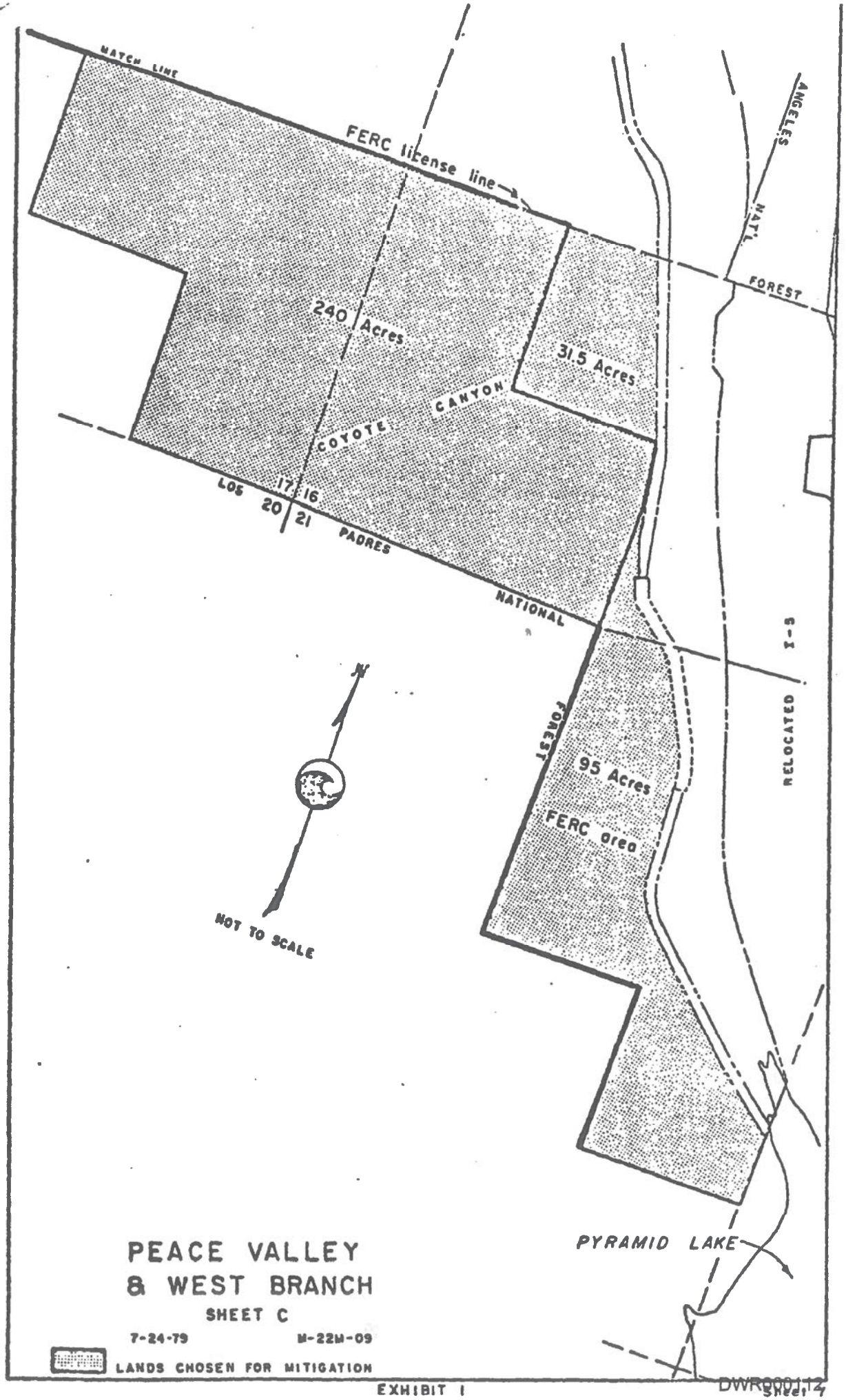
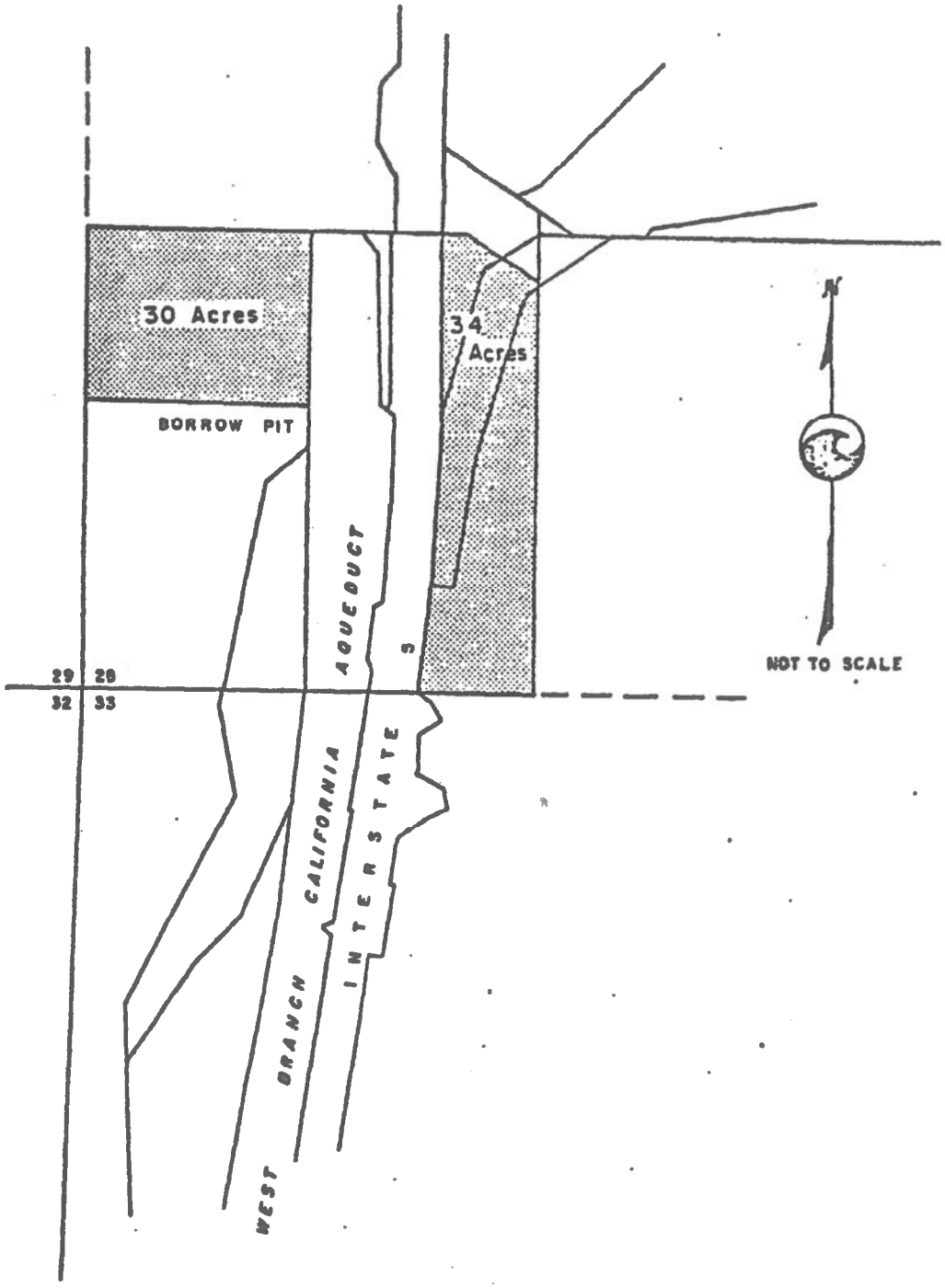

MATCH LINE
FERC license line
ANGELES
NAT'L
FOREST
240 Acres
31.5 Acres
COYOTE
CANYON
17
16
LOS
20
21
PADRES
NATIONAL
FOREST
95 Acres
FERC area
I-5
RELOCATED
N
NOT TO SCALE
PYRAMID LAKE
PEACE VALLEY
& WEST BRANCH
SHEET C
7-24-79
M-22M-09
LANDS CHOSEN FOR MITIGATION

EXHIBIT I



PEACE VALLEY & WEST BRANCH

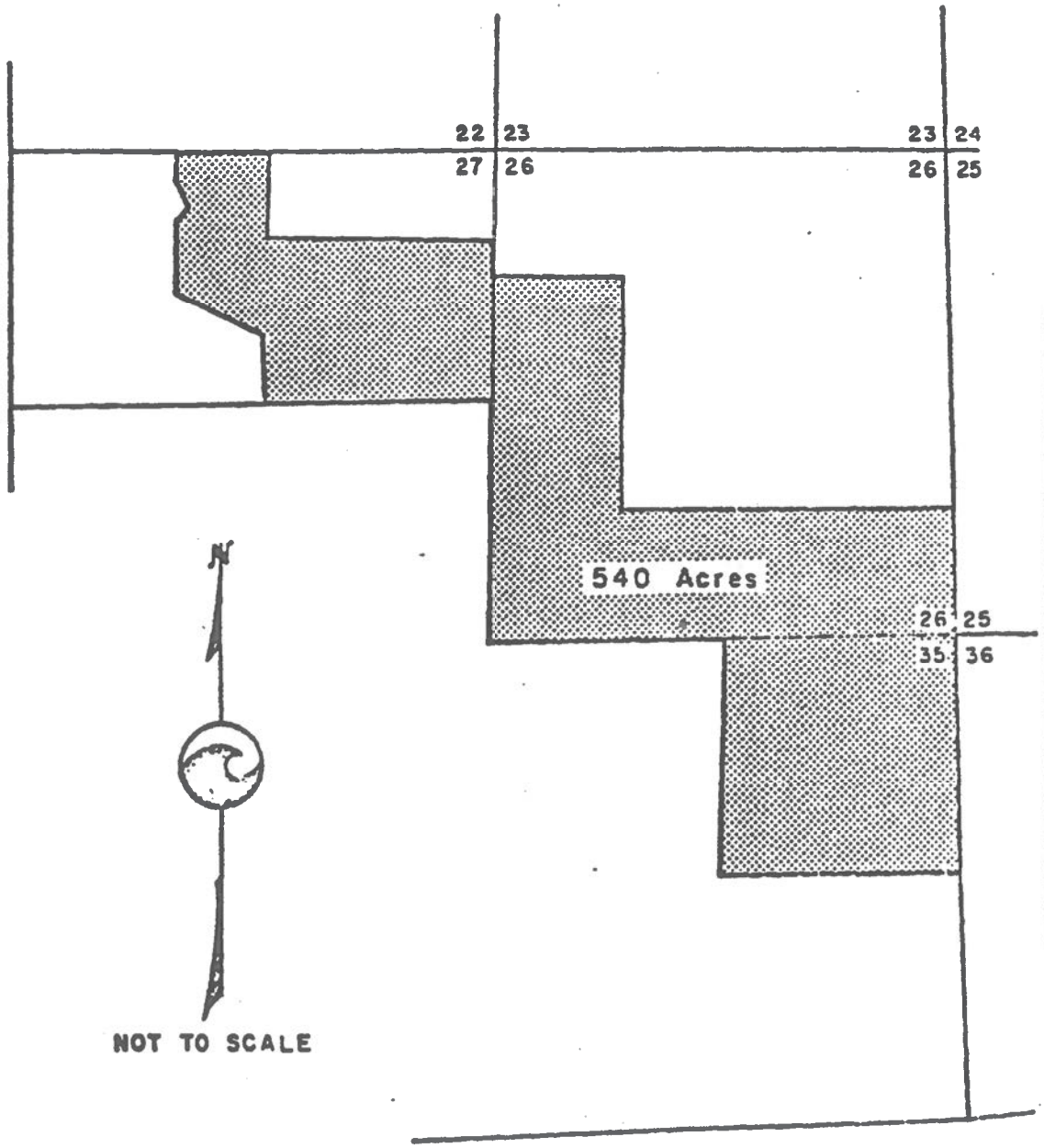
SHEET D

LANDS CHOSEN FOR MITIGATION

8-9-79 M.L.

EXHIBIT I

Sheet 8

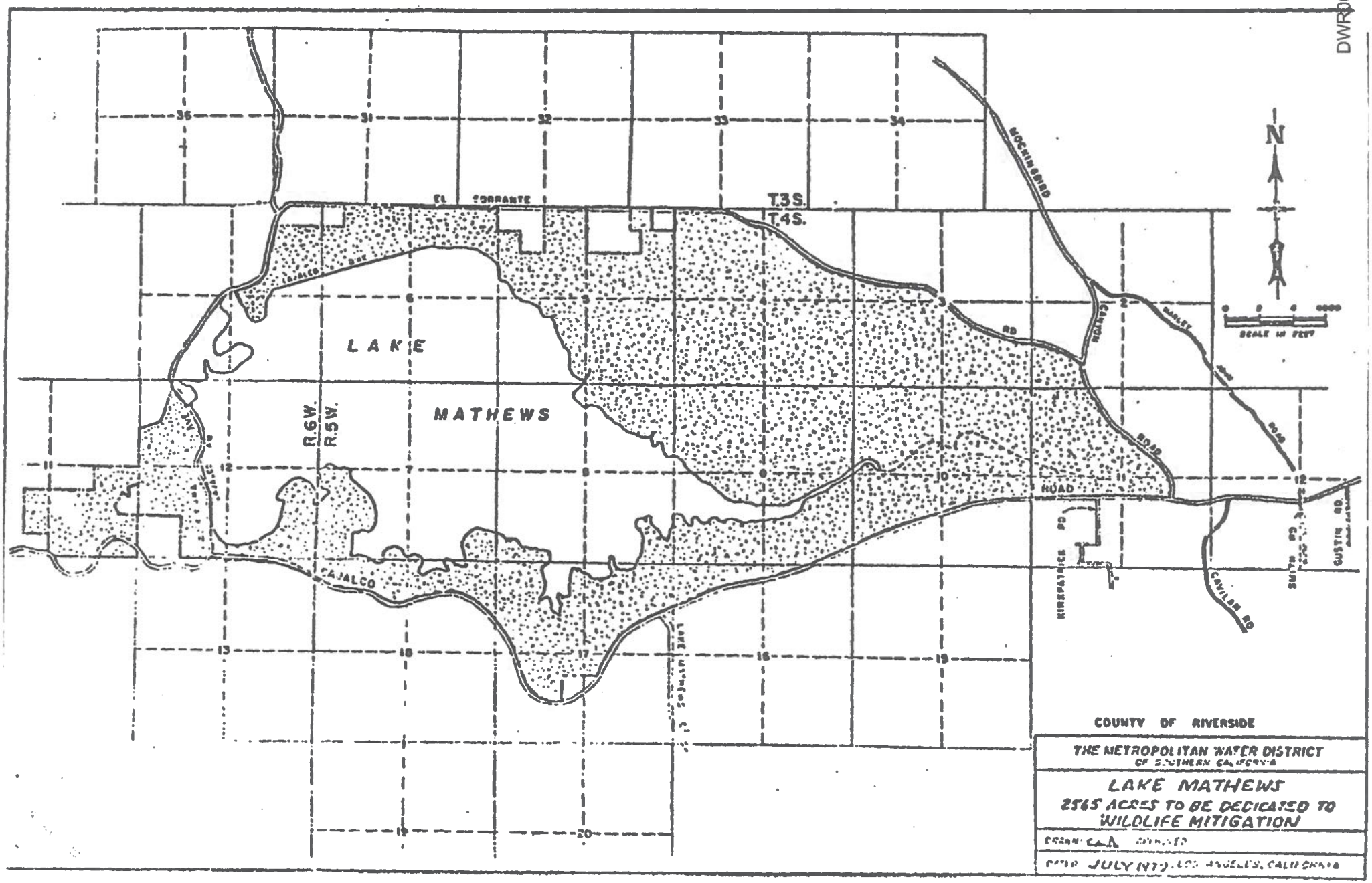


PEACE VALLEY
& WEST BRANCH
SHEET E

LANDS CHOSEN FOR MITIGATION

8-9-79

M-22M-14


T.3S.
T.4S.
R.6W.
R.5W.
LAKE
MATHEWS
EL CORRANTE
SANTA ANA RIVER
CAJALCO
MOCKINGBIRD
HOLMES
MARKET
ROAD
KIRKPATRICK RD
GAVILAN RD
GUSTIN RD
N
SCALE IN FEET
COUNTY OF RIVERSIDE
THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA
LAKE MATHEWS
2565 ACRES TO BE DEDICATED TO
WILDLIFE MITIGATION
DRAWN
DATE JULY 1970 LOS ANGELES, CALIFORNIA

CHAPTER 12

Comments on the Draft EIR/Recirculated Draft EIR and Responses to Comments

This section includes responses to each comment recieved on the Draft EIR and Recirculated Draft EIR. Each comment is restated in the left column of the matrix and DWR's responses are included in the right column. Where the responses indicate additions or deletions to the text of the Draft EIR, additions are included as underlined text, deletions as ~~stricken text~~. The responses indicate where comments received on the Draft EIR were incorporated into the document and included in the Recirculated Draft EIR. The revisions do not significantly alter the conclusions in the Draft EIR.

Letter No	Comment No	Comment	Response
Comments Received during the Draft EIR Comment Period			
Letter 1: U.S. Fish and Wildlife Service and California Department of Fish and Wildlife			
1	A	The U.S. Fish and Wildlife Service (Service) and the California Department of Fish and Wildlife (Department), hereafter collectively referred to as the Wildlife Agencies, have reviewed the draft Environmental Impact Report (DEIR) for the proposed Perris Dam Emergency Release Facility (ERF or Project) which we received on September 9, 2016. The DEIR was prepared to identify the proposed Project's direct, indirect, and cumulative environmental impacts; to discuss alternatives; and to propose mitigation measures that avoid, minimize, or offset significant environmental impacts. The primary concern and mandate of the Service is the protection of fish and wildlife resources and their habitats. The Service has legal responsibility for the welfare of migratory birds, anadromous fish, and endangered animals and plants occurring in the United States. The Service is also responsible for administering the Endangered Species Act of 1973 (Act), as amended (16 U.S.C. 1531 et seq.). The Department is responding to the DEIR as a Trustee Agency for fish and wildlife resources (California Fish and Game Code Sections 711.7 and 1802, and the California Environmental Quality Act [CEQA] Guidelines Section 15386), and as a Responsible Agency regarding any discretionary actions (CEQA Guidelines Section 15381), such as the issuance of a Lake or Streambed Alteration Agreement (California Fish and Game Code Sections 1600 et seq.) and/or a California Endangered Species Act (CESA) Permit for Incidental Take of Endangered, Threatened, and/or Candidate species (California Fish and Game Code Sections 2080 and 2080.1). The Department also administers the Natural Community Conservation Plan (NCCP) Program. On June 22, 2004, the Service issued a section 10(a)(1)(B) permit for the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP). The Department also issued Natural Community Conservation Plan Approval and Take Authorization for the MSHCP as per Section 2800, et seq., of the California Fish and Game Code. The MSHCP established a multiple species conservation program to minimize and mitigate habitat loss and the incidental take of covered species in association with activities covered under the permit. The Wildlife Agencies are providing the following comments on the proposed Project as it relates to the biological resources and ecological processes that would be affected by the proposed Project. We are particularly concerned about Project-related effects to the Los Angeles pocket mouse, kangaroo rat habitat suitability, white- tailed kites, riparian birds, and the loss of Riversidean sage scrub.	The comment is an introduction that lists no specific inadequacy in the EIR. Subsequent comments in the letter are introduced that are addressed in subsequent responses. For responses to comments on specific species, please see Recirculated Draft EIR Section 3.3, Biological Resources; response to comment 1D regarding white-tailed kites; see response to comment 1C regarding Coastal California Gnatcatcher; and Figure 3.3-2 regarding Riversidean sage scrub.

Letter No	Comment No	Comment	Response
1	B	The Project is being proposed by the California Department of Water Resources (DWR) to improve the safe operation of the existing Lake Perris Dam Emergency Release Facility, and to reduce potential flooding to nearby existing residences in the event of a seismic-induced emergency release of the reservoir's water. DWR proposes to modify the Perris Dam's existing emergency release structure and construct a water conveyance facility (levee system) that would reliably control (direct flows from) a reservoir release, and convey emergency flows from Lake Perris in the event of an emergency drawdown. The proposed Project would be constructed across the Lake Perris State Recreation Area (SRA) and the Lake Perris Fairgrounds just north of Ramona Expressway, and connect to the Perris Valley Flood Control Channel. The proposed emergency release facility has three distinct sections: the SRA Segment, the Fairgrounds Segment, and the Western Segment. If an emergency release was initiated, water would be directed by the proposed levee system across the open SRA land between the dam and Ramona Expressway (the SRA Segment) toward a channel across the southern end of the Lake Perris Fairgrounds (the Fairgrounds Segment). Flows would then be conveyed in a channel along the north side of Ramona Expressway to the Perris Valley Channel (the Western Segment).	This comment provides an introductory summary of the project description and lists no specific inadequacy in the EIR. The comment is noted and no further response is required.
1	C	Impacts and Mitigation Measures Coastal California Gnatcatcher The DEIR did not evaluate the Project's effects on the federally threatened coastal California gnatcatcher (*Polioptila californica*, CAGN) and its habitat (coastal sage scrub, also known as Riversidean sage scrub). Table 4-15 of the Biological Resources Evaluation for the Perris Dam Remediation Project EIR (BRE) (Psomas 2009) states that although CAGNs were not observed in the Biological Study Area, the species is present in the SRA, and that suitable foraging and breeding habitat is present within the Biological Study Area. The ERF DEIR states that 12 acres of Riversidean sage scrub will be impacted by the Project. We recommend that the loss of gnatcatcher habitat be mitigate by providing for the permanent conservation and management of gnatcatcher habitat off site.	In response to this comment, additions were made to Section 3.3, Biological Resources and included in the Recirculated Draft EIR. Appendix C1, Table 4-15 of the Recirculated Draft EIR notes that the coastal California gnatcatcher has been observed within the SRA. However, there is no indication that the species has been identified below the dam within the proposed project footprint. Much of the project impact area consists of non-native grassland where coastal California gnatcatcher presence would be unlikely. Figure 3.3-2 of the Recirculated Draft EIR has been modified to include the existing suitable coastal California gnatcatcher habitat located near the proposed project impact area. However, during on-going monitoring conducted for the construction of the Perris Dam Remediation, no coastal California gnatcatcher has been observed within the Emergency Release Facility project impact area. Appendix C6 was added to the Recirculated Draft EIR providing a memorandum outlining results of nesting bird surveys conducted within the proposed project area from 2014 through February 2017. As shown on Table 1 of Appendix C6, a total of 208 surveys have been conducted below the dam and no coastal California gnatcatcher were observed during those surveys. Furthermore, Mitigation Measures BIO-1, BIO-2a, BIO-3, and BIO-6 each require additional pre-construction surveys be conducted prior to

Letter No	Comment No	Comment	Response
			construction. This will ensure that any changes in the local environment that may occur between the publication of the EIR and initiation of construction activities is identified and appropriate impact avoidance measures are implemented for all sensitive species including the coastal California gnatcatcher. Nonetheless, in response to the comment received on the Draft EIR, a description of coastal California gnatcatcher was added to Section 3.3, Biological Resources, Table 3.3-2 of the Recirculated Draft EIR as a species known to occur within the Lake Perris SRA. In addition, information on the coastal California gnatcatcher was added on page 3.3-16 of the Recirculated Draft EIR as shown below in this response. Further impact discussion was also added on page 3.3-30 of the Recirculated Draft EIR to ensure that any potential impacts to the species are identified and reduced to less-than-significant levels. *Page 3.3-16 of the Recirculated Draft EIR* **Coastal California Gnatcatcher** Coastal California gnatcatcher is a small non-migratory bird that is a permanent resident to coastal sage scrub, which is a broad category of vegetation. The species prefers low-lying vegetation and is less common in sage scrub habitat with higher density of taller shrubs such as laural sumac. They also use adjacent chaparral, grassland and riparian habitats for foraging, but typically nest in coastal sage scrub habitats. They are restricted to coastal slopes of southern California from Ventura and western San Bernardino counties south to northern Baja generally below 750 feet elevation in coastal regions and below 1500 feet inland (Atwood and Boisinger, 1992). Coastal California gnatcatcher may still occur along lower, coastal slopes of San Gabriel and San Bernardino Mountains in Los Angeles and San Bernardino counties, but status is uncertain. California gnatcatchers are found in sage scrub habitats throughout western Riverside County with high densities in the area between Lake Elsinore, Lake Skinner, and Temecula (RCIP, 2003). The breeding period is from February to August, but this species remains near breeding grounds all year long. The species has been frequently documented within designated critical habitat for coastal California gnatcatcher located approximately 10 miles to the southwest, 13 miles to the northwest, and 13 miles to the southeast.

Letter No	Comment No	Comment	Response
			There are no documented occurrences of coastal California gnatcatcher within the project area or immediate vicinity below the dam. The species is known to occur within the SRA approximately 2,000 feet northeast of the project site north of the dam and in the San Jacinto Wildlife Area as recently as 2014 (eBird 2016). Protocol surveys were conducted in 2007 and 2008 for coastal California gnatcatcher only within portions of the Bernasconi Hills and surrounding foothill areas, as these were the only areas determined to have potential habitat suitable for the species within the Lake Perris SRA; no coastal California gnatcatchers were found within the areas surveyed which are located just east/northeast of the proposed project's impact area (Psomas 2008). Figure 3.3-1 shows the only location of suitable gnatcatcher habitat within or near the proposed project impact areas where surveys were conducted. The nearest known occurrence to the project site recorded to the CNDDB is from 1990 and is located approximately 3 miles to the southwest. DWR has conducted nesting bird surveys below the dam since 2014 as part of permitting requirements associated with the Perris Dam Remediation Program. As shown on Appendix C6, a total of 208 nesting bird surveys have been conducted below the dam during the bird nesting seasons from February 2014 to February 2017. No coastal California gnatcatcher has been observed during these three years of surveys. A list of avian species observed during the surveys can be found in Appendix C6. Based on the results of this survey, it is determined that there is a low potential for the species to occur in the coastal sage scrub habitat found within the proposed impact area within the SRA, due to the quality of the habitat present and the lack of species sightings during the 208 nesting bird surveys conducted along the proposed project site and in adjacent habitat. *Page 3.3-30 of the Recirculated Draft EIR* Riversidean sage scrub habitat can be found within the SRA near the Lake Perris Fairgrounds. Riversidean sage scrub habitat could potentially provide suitable nesting habitat for the coastal California gnatcatcher and the adjacent riparian habitat could serve as foraging habitat for the species. However, the current Riversidean sage scrub habitat is of low quality and due to its location near existing dirt roads and the adjacent Fairgrounds, it does not provide suitable habitat for the California gnatcatcher. In addition, the species was not observed during focused species surveys

Letter No	Comment No	Comment	Response
			conducted in 2007 and 2008 at the nearby Bernasconi Hills (Appendix C1) nor during nesting bird surveys conducted in the impact zone between 2014 and 2017 (Appendix C6). In addition, Mitigation Measures **BIO-3 through BIO-6** would ensure that any impacts to the species, if found to be present, are reduced to less-than-significant levels through the requirement of preconstruction surveys and the establishment of designated non-disturbance buffers for active nests discovered or adjacent to the proposed project impact areas.
1	D	Indirect Effects of Construction on White-tailed Kite Communal Roosts The DEIR acknowledges that suitable nesting and foraging habitat for white-tailed kites (kite), yellow warblers (warbler) and the endangered least Bell's vireo (vireo), is present in the riparian vegetation located just north of the proposed ERF levees, but evaluates the Project as having no effect on them since (1) the Project will not be built in the riparian vegetation, and (2) MM BIO-3 requires surveys for bird nests within 300 feet of the edge of the construction area ("impact area"). Although the proposed construction footprint will not remove riparian vegetation, the sight and sounds of heavy equipment, workmen, and other Project construction activities in the vicinity may discourage the whit-tailed kites from breeding in this area during the construction phase of the Project. White-tailed kites may be discouraged from nesting and roosting in the riparian strand, or may be flushed from their roosts or nests by construction activities. The white-tailed kite (Elanus leucurus) is a State "Fully Protected Species" – unlike endangered species, no take of any kind of a "Fully Protected Species" is allowed by state law, not even harassment leading to abandonment of a nest or a communal roosting tree. Thus, if kite nests are present, we recommend that the Project not work in the SRA Segment during the kite's nesting season. If a kite communal roost is present, then (regardless of season), impacts could be reduced by erecting a temporary visibility barrier along the edge of the work area facing the riparian strip. The Wildlife Agencies request that the ERF Final EIR (FEIR) include the following information: • Report on the presence and seasonal or year-round use of white-tailed kite communal roosts in the riparian strand near the Project site. • Report on the past and present occurrence of white-tailed kite nests in the riparian strand.	As noted in the comment, Table 3.3-2 of the Draft EIR (also Table 3.3-2 of the Recirculated Draft EIR) notes that the white-tailed kite is known to occur in the area as a year-round resident. Mitigation Measure BIO-3 (as modified in the Recirculated Draft EIR) requires that preconstruction surveys for nesting birds be conducted to determine the presence of nesting behavior. If nests are identified, Mitigation Measure BIO-6 requires that a non-disturbance buffer be established to project nests until the young have fledged. As part of the Perris Dam Remediation Program currently underway, DWR has been conducting on-site monitoring of the riparian areas south of the dam since 2014. As outlined in Appendix C6 of the Recirculated Draft EIR, DWR has been reporting on a monthly basis to CDFW the presence of all birds, including the white-tailed kite. In response to the comment, the following sentence was added to the Recirculated Draft EIR to clarify that although the species is known to occur within the Lake Perris SRA, nesting has not been observed during the 4-year survey period between 2014 and 2017. The Recirculated Draft EIR concludes that implementation of Mitigation Measure BIO-3 would ensure that nesting birds potentially affected by the commotion of construction activities would be identified and protected from harassment. *Page 3.3-11, Table 3.3-2 of the Recirculated Draft EIR* The biological study area contains suitable foraging grassland habitat and suitable nesting riparian habitat to support this species. This species is known to occur within the Lake Perris SRA as a year-long resident. However, the species has not been observed nesting during nesting bird surveys conducted below the dam between 2014 and 2017.

Letter No	Comment No	Comment	Response
		• If white-tailed kites are using the riparian strand, please (1) evaluate how the sight of moving workmen and equipment may affect white-tailed kite utilization of nesting trees and existing communal roosts; and (2) estimate the maximum levels of construction noise be at the edge and tops (tree tops) of the riparian strand, and (3) evaluate how those noise levels may affect: o white-tailed kite utilization of nesting trees and communal roosts; o nest occupancy/success in bird Species of Special Concern known or likely to use the strand for courtship and nesting (e.g., yellow warblers). The assessment of sound effects should be based on the existing scientific literature regarding white-tailed kites and other raptors, and utilizing an appropriate sound propagation model for construction noise effects to birds (to account for effects to avian hearing rather than human hearing, use the dBC noise scale rather than the dBA scale)	
1	E	If the evaluation in the FEIR finds that the sight or sounds of construction activities may flush kites from nests in the riparian strand, please avoid take of white-tailed kites by implementing the following avoidance measures: • If perennially-occupied nests are present (based on previous survey work), please avoid carrying out construction activities in the Project's SRA Segment during the white-tailed kite's breeding season and until all of the young-of-the-year have fledged and left the nests. • If no information is available regarding the use of the riparian strand by nesting white- tailed kites and Project ground-disturbing activities may be conducted during the kite's breeding season, please include a commitment to surveying for the presence of occupied kite nests during the species' breeding season and if an occupied nest is detected, suspending construction activities in the SRA Segment until the young kites fledge or the nest is abandoned in the FEIR.	See response to Comment 1D. White tailed kites have not been observed near the proposed construction areas. Mitigation Measure BIO-3 (as modified in the Recirculated Draft EIR) requires that preconstruction surveys for nesting birds be conducted to determine the presence of nesting behavior. If nests are identified, Mitigation Measure BIO-6 requires that a non-disturbance buffer be established to project nests until the young have fledged.
1	F	Impact 3.3-1b Stephen's kangaroo rat (SKR) was the only listed ground-dwelling species considered to have medium to high potential to occur within the proposed impact areas in the DEIR. Focused surveys were conducted in 2008, 2012, and 2013 in the Project footprint. SKR was not identified within the construction footprint during protocol surveys, however the DEIR recognizes the potential for SKR to have moved into the construction footprint since	In response to the comment, Mitigation Measure BIO-2 was revised as included in the Recirculated Draft EIR to include coordination with and approval from CDFW and USFWS (Mitigation Measure BIO-2a). In addition, to further reduce impacts to small mammal species, Mitigation Measures BIO-2b and BIO-2c were added, requiring implementation of an exclusionary fence prior to the start of construction and a Restoration Plan of the levee slopes. The Recirculated Draft EIR concludes that with implementation of

Letter No	Comment No	Comment	Response
		2013. In addition to construction-related impacts, the DEIR recognizes impacts related to inundation as a result of an emergency drawdown. The DEIR proposes to mitigate both potential impacts through the implementation of Mitigation Measure (MM) BIO-2. The Wildlife Agencies agree with the mitigation approach presented in MM BIO-2 and request that the second and third measures within MM BIO-2 be revised to include the coordination with and approval of CDFW and USFWS when determining appropriate mitigation for SKR impacts.	Best Management Practices and Mitigation Measures BIO-2a, BIO-2b, and BIO-2c, impacts to Stephens' kangaroo rat would be reduced to a less than significant level. *Page 3.3-29 of the Recirculated Draft EIR* **BIO-2a:** DWR shall implement the following measures: • DWR shall have a qualified biologist with a Stephens' kangaroo rat handling permit conduct preconstruction surveys for the Stephens' kangaroo rat within the grassland habitat to determine and map the location and extent of Stephens' kangaroo rat occurrence(s) within the project impact area. Confirmed Stephens' kangaroo rat precincts shall be avoided with the establishment of a nondisturbance buffer zone approved by USFWS and CDFW. • Where avoidance of confirmed Stephens' kangaroo rat precincts is infeasible, DWR shall purchase credits at an approved Stephens' kangaroo rat mitigation bank or replace occupied-habitat at a 1:1 ratio, or as approved by USFWS, CDFW, and the RCHCA. • If an emergency drawdown inundates grasslands within the SRA, DWR shall coordinate with USFWS, CDFW, and the RCHCA to determine the appropriate compensation or remediation, if necessary. The consultation shall consider known and potential Stephen's kangaroo rat occurrences at the time of the drawdown event. **BIO-2b**: Prior to initiation of construction, DWR shall place exclusionary fencing around the proposed work area within the SRA where small mammal habitat exists. Once fencing has been installed, a qualified biologist will trap and move small mammals, as well as other incidental wildlife, within the work zone to an appropriate location outside of the impact area. Trapping will occur no more than one week prior to the start of construction activities. Once construction has been completed, DWR shall remove the exclusionary fence. **BIO-2c:** DWR shall prepare a Restoration Plan in coordination with USFWS and CDFW that identifies an appropriate seed mix for revegetation, hydroseeding methods, monitoring frequency requirements, and habitat performance criteria that will identify the minimum percent cover of restored vegetation along the affected

Letter No	Comment No	Comment	Response
			areas. Monitoring shall be conducted to determine the presence of small mammal use of the restored levee slopes. Once presence of small mammals has been established along segments of the levee, no further surveys will be required in those segments. If no small mammal species are found utilizing the revegetated slopes within five years of the restoration, DWR will coordinate with USFWS and CDFW to determine an appropriate grassland habitat compensation property to be conserved in perpetuity.
1	G	In addition to SKR, the DEIR identifies fourteen other sensitive ground-dwelling wildlife species either known to occur, or with moderate or high potential to occur, within the Project site, including the San Diego banded gecko, coast horned lizard, orange throated whiptail, coastal whiptail, silvery legless lizard, coastal rosy boa, northern red-diamond rattlesnake, northwestern San Diego pocket mouse, Los Angeles pocket mouse, Bryant's woodrat, San Diego desert woodrat, San Diego black-tailed jackrabbit, mountain lion, and American badger. The DEIR determined that impacts to ground-dwelling, non-listed special-status species would be less than significant with mitigation, however no specific mitigation measure was provided.	The Recirculated Draft EIR identified that ground-dwelling species may be present within the construction zone. As noted on page 3.3-26 as a project construction best management practice, DWR would stake, flag, fence or otherwise clearly delineate the construction ROW as needed to avoid impacts to wildlife outside the delineated construction zone. In response to the comment, Mitigation Measure BIO-2b requiring the implementation of exclusionary fencing prior to construction was added to the Recirculated Draft EIR to ensure impacts to ground-dwelling species are avoided during construction activities (see response to Comment 1F). The Recirculated Draft EIR concludes that with implementation of Best Management Practices and Mitigation Measure BIO-2a and BIO-2b, impacts to ground dwelling species would be less than significant.
1	H	The DEIR attempts to address small mammal impacts through project design elements, stating that "…the proposed project is being designed within the SRA specifically to allow small mammals to continue to use the area as a viable habitat, allowing for movement across the levees and creation of burrows along the slopes" (p. 3.3-28). To improve small mammal habitat suitability along the levees and provide connectivity to the levees from the surrounding grasslands the levees will be seeded with native vegetation. The Wildlife Agencies appreciate the proposal to incorporate potentially suitable habitat into the project design, but are concerned that DEIR is relying on an assumption that the levee will be occupied and utilized by special-status small mammal species. To effectively mitigate or minimize impacts to these special-status small mammal species, the Project must verify that the levee has provided replacement habitat that is, at a minimum, equivalent to the habitat lost, and that the replacement habitat (levee) is being utilized by these special-status species at the same levels as the impacted habitat was. The Wildlife Agencies request that the FEIR include specific mitigation measures focused on ensuring the levee slopes will provide suitable habitat for special-status species potentially impacted by the project, and that the levee slopes will actually be utilized by those species. The mitigation measures should commit to the preparation and implementation of a Wildlife	The Recirculated Draft EIR concludes that since the levee will be designed to accommodate recolonization of grassland and ground dwelling species, there would be no net loss of habitat. In response to this comment, Mitigation Measure BIO-2c (see response to Comment 1F) was added to the Recirculated Daft EIR to require the preparation of a Restoration Plan for the levees in coordination with CDFW and USFWS. As requested in this comment, the Restoration Plan would include at a minimum, appropriate seed mix for revegetation, hydroseeding methods, monitoring frequency requirements, and habitat performance criteria. Monitoring would be required to determine use of the levees by small mammals. See response to Comment 1G.

Letter No	Comment No	Comment	Response
		Agency- approved habitat mitigation and monitoring plan (HMMP) that describes the actions necessary to complete the proposed habitat installation activities along the levees, decommissioned roads, and restored native grassland; monitor and maintain the established habitat; monitor recruitment to and utilization of the levees by special-status species; and includes quantifiable habitat success criteria. The HMMP should include information and data on pre-project soil texture and looseness (take measurements throughout the LAPM and kangaroo rat occupied areas of the Biological Study Area using a penetrometer, and measure soil bulk density) and use those two baselines as targets for restoring soil texture and looseness to help render the restored areas suitable for small mammal burrowing. Methods to de-compact the soils on the restoration sites, if needed, should be included in the HMMP. We request that a few hundred temporary artificial burrows (sized appropriately for pocket mice and kangaroo rats, respectively) be created using cardboard or wood tubes (so the artificial material will decay over time) to "jump-start" small mammal recolonization on the two restoration sites. The habitat mitigation and monitoring plan should be provided to the Wildlife Agencies for review and approval prior to its implementation. If it is determined at the end of the monitoring period that the levee slopes are not being utilized, or that utilization is sparse compared to the adjacent avoided, occupied habitats, then additional mitigation, such as the replacement of habitat, should be considered in consultation with the Wildlife Agencies.	
1	I	Impact 3.3-1c The Project site and adjacent areas have been known to support several listed or special-status avian species, including bald eagle, America peregrine falcon, least Bell's vireo, white-tailed kite, northern harrier, golden eagle, loggerhead shrike, yellow warbler, and other special-status avian species. The DEIR acknowledges the Project could have indirect impacts on some of these species as a result of construction activities, but has determined that the impacts would be less than significant with the implementation of MM BIO-3 through MM BIO-6. MM BIO-3 requires a qualified biologist conduct preconstruction spring/summer active season reconnaissance surveys for nesting migratory bird species, burrowing owl, and other nesting birds within 300 feet of the construction limits of each Project element to determine and map the location and extent of special-status species that could be affected by the Project. The Wildlife Agencies are unclear whether surveys conducted within	The Recirculated Draft EIR concludes that impacts to nesting birds would be avoided through the implementation of Mitigation Measures BIO-3 through BIO-6. In response to this comment, Mitigation Measure BIO-3 was modified on page 3.3-31 of the Recirculated Draft EIR. *Page 3.3-31 of the Recirculated Draft EIR* **BIO-3:** DWR shall have a qualified biologist conduct a preconstruction ~~spring/summer active season~~ reconnaissance survey for nesting migratory bird species, burrowing owls, and other nesting birds within 300 feet of the construction limits of each project element to determine and map the location and extent of special-status species occurrence(s) that could be affected by the project.

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		"spring/summer active season" would preclude observation of wintering species. The Wildlife Agencies recommend that MM BIO-3 be clarified to ensure reconnaissance surveys are inclusive of all seasons and species that have the potential to be affected, regardless of when they may nest on the Project site.	
1	J	MM BIO-5 and MM BIO-6 propose to avoid direct impacts to nesting birds by removing plant materials outside of the typical nesting season (February 1 through August 31), or by performing preconstruction surveys and establishing buffers surrounding any active nests during vegetation removal activities. Although MM BIO-5 and MM BIO-6 commit to protecting nesting birds from direct impacts as a result of vegetation removal, these measures do not address potential indirect impacts resulting from other Project construction elements (such as earth moving, levee construction, material transport, etc.). The Wildlife Agencies recommend the FEIR incorporate specific mitigation measures to address potential indirect impacts to any avian species with the potential to occur onsite, including listed, special-status, and non-listed/special-status species. The Wildlife Agencies recommend the mitigation measure commit to preparation and implementation of a Wildlife Agency-approved avian species avoidance plan. The avian species avoidance plan should describe specific measures that will be taken to ensure that impacts to avian species do not occur, including initial and interim monitoring protocols, survey timing and duration, measures to avoid impacts to nesting birds, and project-specific avoidance and minimization measures such as project phasing and timing, monitoring of project-related noise, sound walls, and buffers.	Implementation of Mitigation Measures BIO-3 through BIO-6 would ensure that direct and indirect impacts to nesting birds would be avoided. Mitigation Measure BIO-3 requires that nesting surveys be conducted within a 300-foot area around the construction zone to account for indirect impacts. The Mitigation Measure BIO-3 was modified in the Recirculated Draft EIR to require the survey during any season (see response to Comment 1I). The Recirculated Draft EIR concludes that implementation of Mitigation Measure BIO-3 would ensure that nesting birds potentially affected by the commotion of construction activities would be identified and protected from harassment As a result, an avian species avoidance plan is not necessary. DWR will work closely with CDFW to ensure impacts are avoided, as has been the case throughout the construction of the Perris Dam Remediation Project.
1	K	Impact 3.3-2 The DEIR discusses impacts to non-native grassland and drainages, but does not address the approximately 12 acres of Riversidean sage scrub (RSS) that would be lost to the construction of the project. Although not identified as such in the DEIR, RSS is considered to be a "sensitive natural community" by both CDFW and USFWS. The Wildlife Agencies recommend the FEIR acknowledge impacts to this special-status community and provide a mitigation measure to address the loss of this sensitive natural community. The mitigation measure should commit to replacement, restoration, and/or enhancement of RSS habitat, as approved by the Wildlife Agencies.	Figure 3.3-2 of the Recirculated Draft EIR identifies that close to 12 acres of Riversidean sage scrub would be impacted by the construction. The Recirculated Draft EIR describes on page 3.3-28 that levees would be constructed to replace the impacted acreage with grassland habitat. Impact 3.3-2 describes that the habitat temporarily impacted by the project would be replaced along the sides of the levees. In response to this comment, Mitigation Measures BIO-2b and BIO-2c were added to the Recirculated Draft EIR (see response to Comment 1F) to ensure impacts to habitat and sensitive species would be less than significant. Riversidean sage scrub would be included as a target habitat to be restored along with grassland. As described in response to Comment 1H, there would be no net loss of habitat within the Lake Perris SRA and impacts to sensitive habitats would remain less than significant.

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1	L	Impact 3.3-6 A portion of the Project alignment falls within Western Riverside Multiple Species Habitat Conservation Plan (MSHCP) Public/Quasi-Public (PQP) land and Stephen's Kangaroo Rat Habitat Conservation Plan (SKRHCP) Core Reserve lands. The Lake Perris SRA, along with the San Jacinto Wildlife Area and adjoining conserved lands, makes up Core H of the MSHCP. Much of MSHCP Core H is also SKRHCP's San Jacinto/Lake Perris Core Reserve. Among other benefits, the Core H/ San Jacinto/Lake Perris Core Reserve provides live-in habitat for several special-status species, including the coastal western whiptail, Belding's orange-throated whiptail, San Diego banded gecko, northern red diamond rattlesnake, San Diego horned lizard, northwestern San Diego pocket mouse, Stephens' kangaroo rat, San Diego black-tailed jackrabbit, bobcat, San Diego desert woodrat, and the Los Angeles pocket mouse. The DEIR argues that, "…impacts within the MSHCP Public/Quasi-Public land would be considered temporary during construction since the levees would be revegetated and could be used by small mammals and other wildlife species in the area as habitat" (p. 3.3-34). Based on this assertion, the DEIR does not propose to replace PQP lands affected by the Project. Similarly, when considering potential impacts to the SKRHCP Core Reserve, the DEIR finds that the construction of the levees "would not alter the availability of potential Stephens' kangaroo rat habitat" (p. 3.3-34). Based on this finding, the DEIR does not propose to replace or mitigate the loss of SKRHCP Core Reserve lands. Though the Wildlife Agencies are hopeful that the levees will provide suitable habitat for sensitive species of small mammals and reptiles following Project completion, we cannot concur that the Project will result in habitat that is equivalent to the habitat that currently exists (pre-project). Therefore, the Wildlife Agencies strongly recommend the Project replace or mitigate impacts to MSHCP PQP and SKRHCP Core Reserve lands at a minimum 1:1 ratio. Any replacement properties or mitigation proposals should be reviewed and approved by the Wildlife Agencies and appropriate HCP-implementing agencies prior to the initiation of Project activities.	The Recirculated Draft EIR concludes that the restoration of habitat along the levees would result in no net loss of habitat within the SKR HCP Core Reserve Area and MSHCP Public/Quasi-Public lands. To ensure that the habitat values are compensated, the Recirculated Draft EIR includes the new Mitigation Measure BIO-2c (see response to Comments 1F and 1H) that requires a Restoration Plan be prepared in coordination with CDFW and USFWS to ensure that small mammals are observed to be present and utilizing the levees within five years of levee restoration. See response to Comments 1G and 1H. The Recirculated Draft EIR concludes that with implementation of Mitigation Measure BIO-2c, impacts would be less than significant.
1	M	Missing EIR Appendix The ERF DEIR's Biological Resources chapter repeatedly refers the reader to a document allegedly available in Appendix C titled "Biological Resource Evaluation [BRE] of the Lake Perris Dam Remediation Project"; however, the BRE was not included in either the printed or disk copies of the DEIR (including Appendix C) for the ERF. Please attach it to the FEIR.	In response to this comment, the Recirculated Draft EIR circulated the Biological Resources Evaluation of the Lake Perris Dam Remediation Project as Appendix C1 for review.

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1	N	Summary The Wildlife Agencies are concerned the Project may have a substantial adverse effect on listed and special-status species without the implementation of focused avoidance, minimization, and mitigation measures. As currently written, the DEIR does not provide the level of detail necessary for the Wildlife Agencies to concur that the Project impacts would be reduced to a level that is less than significant. We suggest that additional mitigation measures be included in the EIR prior to its adoption. The Wildlife Agencies would appreciate the opportunity to meet and discuss our comments and potential mitigation strategies to address the Project impacts. Please contact Heather Pert of the Department at (858) 395-9692, or Jim Thiede of the Service at (760) 322-2070, extension 419, to schedule a meeting.	In response to the concerns expressed in the comment letter, Mitigation Measures BIO-2b and BIO-2c were added to the Recirculated Draft EIR to ensure impacts to habitat and sensitive species would be less than significant. In addition, changes were made to Mitigation Measure BIO-2a to require approval and/or coordination with CDFW and USFWS where avoidance of SKR-occupied habitat is infeasible. DWR met with CDFW and USFWS to discuss concerns and outline strategies for the Recirculated Draft EIR prior to recirculation. DWR welcomes any additional comment the wildlife agencies may have in regards to on-going project-related coordination.
Letter 2: Riverside County Flood Control and Water Conservation District			
2	A	This letter is written in response to the Notice of Availability (NOA) for the Department of Water Resources (DWR) Perris Dam Emergency Release Facility Draft Environmental Impact Report (EIR). DWR proposes to modify Perris Dam's existing emergency release structure and construct a water conveyance facility that would reliably control a reservoir release and convey emergency flows from Lake Perris in the event of an emergency drawdown. The proposed project would be constructed partially within the Lake Perris State Recreation Area and Lake Perris Fairgrounds, just north of Ramona Expressway, and would connect to the Perris Valley Channel. The District has reviewed the EIR and has the following comments: The EIR indicates that an encroachment permit will be required from the District. Please be advised that if an encroachment permit is required, the applicant is required to demonstrate consistency with the applicable sections of the Western Riverside County Multiple Species Habitat Conservation Plan for all work that involves the District rights of way, easements or facilities. To obtain further information on encroachment permits or existing facilities, contact Amy McNeill of the Encroachment Permit Section at 951.955.1266.	DWR has coordinated with the Regional Conservation Authority (RCA) which manages the MSHCP. As stated on page 3.3-33 and 34 of the Recirculated Draft EIR, the proposed project is consistent with the MSHCP. In addition, the Recirculated Draft EIR states that if proposed project areas should become inhabited by species covered under the MSHCP, DWR will coordinate with the RCA prior to construction activities. See responses to Comment Letter 1.
2	B	The proposed project may impact federal and state jurisdictional features (e.g., waters of the United States, waters of the State, streambeds, wetlands, etc.) within the existing Perris Valley Channel. As part of the encroachment permit process, the applicant will also be required to submit proof of applicable permits (404, 401, 1602) or documentation that permits are not required to the District prior to the issuance of the encroachment permit. Any regulatory permitting requirements pertaining to the construction and	The Recirculated Draft EIR notes in Table 2-3 that impacts to waters of the US and of the State may occur, warranting the need for 404, 401, and 1602 permits. DWR will coordinate with applicable federal and state agencies in order to obtain permits or documentation stating that permits are not required for the proposed project. DWR will submit all applicable documentation to the Riverside County Flood Control and Water Conservation District (RCFCWCD) prior to construction.

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		subsequent operation and maintenance of the facility should be reviewed and approved by the District prior to their execution.	
2	C	The proposed project is located within the Perris Valley Master Drainage Plan (MDP). 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. The EIR should address impacts to MDP facilities within the proposed project area, specifically Line U and Perris Valley Channel. The MDP maps can be viewed online at www.rcflood.org. To obtain further information on the MDP and the proposed facilities, please contact Edwin Quinonez of the District's Project Planning Section at 951.955.1345.	The proposed project would accommodate the Line U stormwater drainage requirements, creating a facility that could serve both functions. This is confirmed in numerous places in the Draft EIR including on pages 3.9-11 and 3.9-12 of Section 3.9, Hydrology, Water Quality, and Groundwater. In response to this comment the following was added to the project description on page 2-1 and 2-6 of Section 2.2, Project Description of the Recirculated Draft EIR, to further confirm the use of the proposed facility as Line U. *Page 2-1 of the Recirculated Draft EIR* The ERF would replace the existing drainage ditch that conveys storm flow to the Perris Valley Channel for the area north of Ramona Expressway and west of Perris Dam. The Riverside County Master Drainage and Area Drainage Plans have determined that this drainage, known as Line U, will need to be enlarged to accommodate the full buildout within the subwatershed. The ERF would serve as Line U, providing the full capacity of storm flow protection required by the Riverside County Master Drainage and Area Drainage Plans. *Page 2-6 of the Recirculated Draft EIR* Expressway to the Perris Valley Channel (Western Segment). These conveyance facilities are discussed separately below and in the following pages and are described as segments (see Figure 2-2). The new facility would be designed to convey stormwater flow within the subwatershed to the Perris Valley Channel consistent with the “Line U” facility proposed in Riverside County Flood Control and Water Conservation District (RCFCWCD) Master Drainage and Area Drainage Plan.
2	D	As noted on Page 3.1-9 of the EIR, maintenance of the proposed channel may be provided by the District pending the details of a future maintenance agreement. Please note that the District may be willing to maintain the facility, however, the facility would need to be designed to District standards in order for it to be accepted. Edwin Quinonez can provide more details regarding District design standards.	DWR will coordinate with the RCFCWCD during the design effort of the flood control facility in order to determine if design of the flood control facility could be constructed to RCFCWCD standards. As stated on page 3.1-9, DWR would enter into an agreement with RCFCWCD for the joint use of the facility as an emergency release facility and stormwater runoff channel, or if an

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		Thank you for the opportunity to review the EIR. Any further questions concerning this letter may be referred to Kevin Cunningham at 951.955.1526 or me at 951.955.8581	agreement is not possible, DWR would prepare an Emergency Operations and Maintenance Manual for the channel.
Letter 3: Cal Fire – Riverside Unit			
3	A	Fire protection for the above referenced project will be provided by the following Riverside County Fire Station: Station 90, located at 333 Placentia Avenue in the City of Perris, will respond with one city Quint Ladder Truck providing paramedic service. The distance from the station to the proposed development is approximately 3 miles. This station is staffed 24 hours a day, 7 days a week, with a 4 person crew, providing Paramedic Service.	The comment does not raise an issue under CEQA. The comment is noted and no further response is required.
3	B	The proposed project will have a cumulative adverse impact on the Fire Department's ability to provide an acceptable level of service. These impacts include an increased number of emergency and public service calls due to the increased presence of structures, traffic, and population. The project proponents/developers will be expected to provide an easement or restricted access to Emergency Fire Department Personnel in case of an emergency.	As outlined in Mitigation Measure UTIL-1 of the Draft EIR, DWR will create a temporary emergency access road for use by emergency responders on an as-needed basis in order to allow for a shorter alternative to the detour route and minimize interruptions, if full closure (Option B) is implemented. For partial closure (Option A), at least one lane in each direction will remain open and emergency vehicles will have uninterrupted access on both Evans Road and Lake Perris Drive with slight increases in delay. Also, as stated on page 3.12-5 of the Recirculated Draft EIR and throughout the document, a Traffic Management Plan will be prepared prior to project construction. The plan will identify specific traffic control measures to ensure access and safety on the local roadway network (Ramona Expressway, Avalon Parkway, Lake Perris Drive, and Evans Road) and within the Lake Perris SRA and Lake Perris Fairgrounds are maintained and that appropriate agencies and personnel (California Department of Forestry and Fire Protective Services, Riverside County Fire Department, Riverside County Sherriff's Department, California Highway Patrol, and State Park Rangers) are contacted ahead of any closures due to implementation of the proposed project. DWR would coordinate with local, state, and federal agencies regarding emergency access.
3	C	The complete closure of Evans Road will delay emergency response from the South side within the City of Moreno Valley and the North Side of the Perris City limits. Lake Perris Drive will be open to FD access only in the event of full road closure. Contractual and monetary agreements are on file between the City of Perris and the City of Moreno Valley for Emergency responses. Full closure of Evans Road will have to be mutually agreed upon by all	See response to Comment 3B.

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		parties, and any detours this project may cause during the construction phase.	
3	D	Fire Department emergency vehicle apparatus access road locations and design shall be in accordance with the California Fire Code, Riverside County Ordinance 460, Riverside County Ordinance 787, and Riverside County Fire Department Standards. This includes full closure of main access areas at Evans Road.	See response to Comment 3B.
3	E	Fire Department water system(s) for fire protection shall be in accordance with the California Fire Code, Riverside County Ordinance 787 and Riverside County Fire Department Standards. Plans must be submitted to the Fire Department for review and approval prior to building permit issuance.	The proposed project includes the construction of levees and channels to create a water conveyance facility able to transport water from the dam's outlet structure to the Perris Valley Channel in the event of an emergency. The levees and channels would be construction of rock, cement and native soils, and facilities associated with the emergency release structure would include new replacement concrete structures. None of the facilities would include flammable or combustible building materials. The proposed project would not require building permits or fire department water systems. In addition, DWR will coordinate with local and state emergency responders to establish appropriate fire safety measures.
3	F	Prior to Building Permit issuance, the required water system, including all fire hydrant(s), shall be installed and accepted by the appropriate water agency and the Riverside County Fire Department prior to any combustible building materials placed on an individual lot. Contact the Riverside County Fire Department to inspect the required fire flow, street signs, and the required all weather surface access roadways. Approved water plans must be at the job site	See response to Comment 3E.
3	G	The project is located in the "[LRA][SRA] [High][Moderate][Severe] Fire Hazard Severity Zone" of Riverside County as shown on a map titled Very High Fire Hazard Severity Zones, dated April 8, 2010 and retained on file at the office of the Fire Chief and supersedes other maps previously adopted by Riverside County designating high fire hazard areas. Any building constructed on lots created by this project shall comply with the special construction provisions contained in Riverside County Ordinance 787, Title 14, the California Building Code and Riverside County Fire Department Information Bulletin #08-05. Plans must be submitted to the Fire Department for review and approval prior to building permit issuance.	See response to Comment 3E.
3	H	Prior to Building Permit issuance, the required water system, including all fire hydrant(s), shall be installed and accepted by the appropriate water agency	See response to Comment 3E.

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		and the Riverside County Fire Department prior to any combustible building materials placed on an individual lot. Contact the Riverside County Fire Department to inspect the required fire flow, street signs, and the required all weather surface access roadways. Approved water plans must be at the job site.	
3	I	Further review of the project will occur upon receipt of building plans. Additional requirements may be necessary at that time. If I can be of further assistance, please feel free to contact me at (951) 287-4049 or email Richard.Tovar@fire.ca.gov.	The comment does not raise an issue of noncompliance under CEQA. The comment is noted and no further response is required.
Letter 4: City of Moreno Valley			
4	A	The City of Moreno Valley appreciates the opportunity to comment on the completed Draft Environmental Impact Report (DEIR) for the Perris Dam Emergency Release Facility. The project is located in unincorporated Riverside County, north of the Ramona Expressway between East Rider Street and the Perris Valley Channel. The City understands that the proposed project would modify the existing emergency release structure, resulting in a facility that is safer to operate in the event of an emergency. The City has reviewed the DEIR and found that the project would not negatively impact the City of Moreno Valley. Therefore, we do not have any comments to provide on the DEIR document. Thank you again for the opportunity to review and comment on the Perris Dam Emergency Release Facility project. We look forward to receiving a final copy of the EIR document once it becomes available. Please continue to include the City on any and all mailing lists as well as future notifications of meetings/public hearings associated with the project. Should you have any questions or concerns, please contact me at (951) 413-3215.	The comment does not raise an issue of noncompliance under CEQA. The comment is noted and no further response is required.
Letter 5: City of Perris			
5	A	The City of Perris appreciates the opportunity to comment on the Draft Environmental Impact Report (EIR) for the Perris Emergency Release Facility project. The City of Perris has the following comments: 1. The City is opposed to the complete closure of Evans Road during bridgework activity. Closure of Evans Road for one year will create significant impacts to nearby residents and schools by worsening traffic conditions in the area. Partial closure for Evans Street (Option	The Recirculated Draft EIR in Section 3.14 evaluates potential impacts to traffic that would result from either a partial closure or full closure of Evans Road. The Recirculated Draft EIR concludes on page 3.14-27 that the proposed project would result in significant unavoidable impacts to traffic under either construction scenario. DWR recognizes the City's preference for the partial closure option, and will select either Option A (Partial Closure) or B (Full Closure) prior to approving the project. The analysis concludes that

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		A or B) during bridge work activity would allow for the least impacts to local traffic. The City has no objection to partial closure and requests that during construction, traffic polic e enforcement be increased throughout am/pm traffic peak hours. Traffic signal timing should also be modified at the Evans Road and Ramona Expressway and further south at the traffic signal on Morgan/Evans near May Ranch Elementary School. As well, other on-going and future construction in the vicinity should be included in the traffic analysis.	Option A (Partial Closure) would allow for flow through traffic but would affect traffic for a longer period than Option B (Full Closure). DWR will coordinate with the City of Perris to ensure adequate traffic police are provided. This would be included in the required Traffic Management Plan. The traffic analysis was supported by a Traffic Technical Study, included as Appendix F of the Recirculated Draft EIR. Mitigation Measure TRANS-1 was developed with input from the Traffic Technical Study to mitigate impacts to traffic through re-striping of turning lanes and modifying signalization to facilitate traffic. The proposed temporary lane changes are shown in Figures 3.14-2 and 3.14-3 of the Recirculated Draft EIR. The Draft EIR assesses cumulative impacts to traffic conditions on page 4-11 and concludes on page 4-12 that the project would contribute to a significant cumulative effect. The Draft EIR and Recirculated Draft EIR acknowledge that the significant impacts to traffic are unavoidable. In addition, as stated on page 3.14-12 of the Recirculated Draft EIR and throughout the document, a Traffic Management Plan will be prepared prior to project construction. The Traffic Management Plan would require the implementation of measures to maintain traffic flow and would identify specific traffic control measures to ensure access and safety on the local roadway network. DWR will coordinate with the City of Perris to ensure public safety.
5	B	2. EIR should clearly identify and address operational impacts to the motocross park, fairgrounds, and future commercially designated areas nearby.	The Draft EIR notes on page 3.13-3 that the project would result in the temporary removal and redevelopment of the Lucas Oil/Starwest Motocross Park. The project would result in the removal of some property that is currently used for recreational facilities, as well as a portion of the existing parking lot. Although the removal of parking and a portion of the motocross facility is not an environmental impact in itself, the Draft EIR evaluated impacts of a dual use facility through the Fairgrounds Segment to allow for parking and potential motocross activities within the gentle slopes of a portion of the channel. The Draft EIR provides the project objectives on page 2-5. In order to meet project objectives, DWR must improve the existing emergency water conveyance system to reduce the risk to public safety and property resulting from the execution of an emergency operation required to drawdown Lake Perris. In response to comments received during the original Draft EIR comment period and through coordination with the Fairgrounds, the Recirculated Draft EIR, included the addition of a new alternative for construction of the channel through the Fairgrounds Segment (Fairgrounds property). As stated in

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			Section 2, Project Description, page 2-11 of the Recirculated Draft EIR, the channel along the Fairgrounds property would be constructed as one of two alternatives, a Dual-Use Alternative or an Unlined Channel Alternative. The Unlined Channel Alternative was added due to the smaller impact footprint within the Fairgrounds. The two alternative channels are depicted on Figure 2-7 of the Recirculated Draft EIR. The Recirculated Draft EIR, analyzed the Unlined Channel Alternative and concluded that both alternatives would result in similar significance determinations as shown on Table ES-2 of the Recirculated Draft EIR. Although the removal of parking and a portion of the motocross facility is not an environmental impact in itself, the Draft EIR and Recirculated Draft EIR conclude that some impact to parking spaces and the motocross facility would occur, but concludes that the temporary construction impacts to land use and recreational uses at the Fairgrounds would be less than significant. The Draft EIR concludes that once construction is completed, the Fairgrounds and overall facilities (with the exception of some impacts to the motocross) would return to normal and continue to be a valuable recreational asset, with the anticipation of pre-project levels of public participation.
5	C	3. The City is concerned that barrier walls/pillars for the project may adversely affect the availability of water from the subterranean stream. The City has a permit from the SWRCB to appropriate water from the subterranean stream, and a pending application to appropriate additional water. The EIR should address how the construction of the project will affect the existing subterranean stream and impacts to the City's water appropriation.	The proposed project evaluated in the Draft EIR does not include any portion of the previously analyzed Perris Dam Remediation Project currently under construction. The emergency release facility would not affect movement of groundwater or limit access to groundwater in any way because its features are limited to the top few feet of the ground surface and will not intersect the subterranean stream.
5	D	4. The proposed barrier/walls should be designed in a manner to protect the downstream properties and withstand the normal/acceptable natural conditions and events.	The proposed project evaluated in the Draft EIR does not include any portion of the previously analyzed Perris Dam Remediation Project currently under construction. The emergency release facility would not affect movement of groundwater or limit access to groundwater in any way. The channel walls and levees would be designed by DWR and constructed consistent with standard building codes to avoid erosion and levee failure.
5	E	5. EIR should clarify joint discharge facilities for both Flood Control and Perris Dam release.	See response to Comment 2C.
5	F	6. EIR should analyze export/import of materials to the site and should discuss mitigation for road impacts.	Figure 2-5 of the Recirculated Draft EIR identifies haul routes proposed to convey excavated soil from the Western Segment to the SRA Segment. As shown in the Figure 2-5 of the Recirculated Draft EIR, the proposed project would minimize use of public roads. Haul trucks using Ramona Expressway would be limited to the segment between Evans Road and Lake Perris Drive.

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			The roads designated as haul routes are designed to accommodate the number and size of trucks that will be required during proposed project construction. DWR will coordinate with the City of Perris to ensure that roads (used as haul routes) are not damaged.
5	G	7. EIR should also explore the alternative of diverting water through the nearby linear park. Again, thank you for the opportunity to comment on the Draft EIR. If you require any additional information or clarification, please contact me at (951)943-5003, ext. 272.	The Recirculated Draft EIR identifies the Rider Avenue Alternative on page 6-3 as an alternative that was considered but rejected due to infeasibility. The Rider Avenue Alternative would require tunneling through hard rock to connect the emergency release structure with the Rider Avenue alignment. In addition, the Rider Avenue alignment is underlain by the 80-year old Colorado River Aqueduct and Metropolitan Water District (Metropolitan) does not allow any development to occur on top of the Aqueduct. The tunneling would be close to the underground Colorado River Aqueduct and could damage the aqueduct. For these reasons, the Rider Avenue Alternative was rejected from further consideration.
Letter 6: The Metropolitan Water District of Southern California			
6	A	The Metropolitan Water District of Southern California (Metropolitan) has reviewed the Notice of Availability of the Draft Environmental Impact Report for the Perris Dam Emergency Release Facility. The California Department of Water Resources (DWR) proposes to modify Perris Dam's existing emergency release structure and construct a water conveyance facility that would reliably control a reservoir release and convey emergency flows from Lake Perris in the event of an emergency drawdown. The proposed project would be constructed partially within the Lake Perris State Recreation Area (SRA) and Lake Perris Fairground, just north of Ramona Expressway, and would connect to the Perris Valley Channel. The proposed project includes: • Modify the existing emergency release structure by removing the existing bulkhead and replacing it with one or more automated valves • Constructing conveyance facility improvements that would control a maximum reservoir release up 3,800 cubic feet per second (cfs) and convey emergency flows from Lake Perris in the event of an emergency drawdown. Metropolitan is a public agency and regional water wholesaler. It is comprised of 26 member public agencies service approximately 19 million people in portions of six counties in Southern California, including Riverside County. Metropolitan's mission is to provide its 5,200 square mile service area with	This comment does not describe an inadequacy of the Draft EIR. No further response is required.

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		adequate and reliable supplies of high-quality water to meet present and future needs in an environmentally and economically responsible way.	
6	B	Upon review of the proposed emergency water conveyance system location, Metropolitan has determined that the project has the potential to impact Metropolitan's facilities including the possibility of impacting one of our feeder pipelines. Metropolitan owns and operates the 120-inch-inside-diameter prestressed concrete Lake Perris Bypass Feeder within the limits of this project. This pipeline is a critical part of our distribution system and work in the area of the pipeline will require coordination with Metropolitan. This letter contains Metropolitan's comments to the proposed project as a potentially affected public agency. Please include Metropolitan as a responsible agency in Table 2-3 on page 2-22. Metropolitan may need to issue an Encroachment Permit in connection with the Lake Perris Bypass Feeder.	DWR will coordinate excavation efforts with all responsible agencies within the proposed project area with the potential to be impacted by project construction, including Metropolitan Water District per Agreement dated January 3, 1974.
6	C	Metropolitan must be allowed to maintain its facilities in order to maintain and repair its system. In order to avoid potential conflicts with Metropolitan's facilities and rights-of-way, we require that any design plans for any activity in the area of Metropolitan's pipelines or facilities be submitted for our review and written approval. Any future design plans associated with this project should be contingent on Metropolitan's approval of design plans for portions of the proposed project could impact its facilities. Impacts to facilities will be dependent on the design and specific location of proposed facilities, and could include, but are not limited to, impacts due to additional loading on Metropolitan's pipeline and scour upon use of the proposed facilities.	See response to Comment 6B. DWR will coordinate with Metropolitan during the design phase in order to properly determine the location and final design for the proposed project facilities.
6	D	Detailed prints of drawings of Metropolitan's pipelines and rights-of-way may be obtained by calling Metropolitan's Substructures Information Lines at (213) 217-6564. To assist the applicant in preparing plans that are compatible with Metropolitan's facilities and easements, we have enclosed a copy of the "Guidelines for Developments in the Area of Facilities Fee Properties and/or Easements of The Metropolitan Water District of Southern California." Please note that all submitted designs or plans must clearly identify Metropolitan's facilities and rights-of-way. We appreciate the opportunity to provide input to your planning process and we look forward to receiving future documentation and plans for this project. For further assistance, please contact Ms. Vikki Dee Bradshaw at (213) 217-6028.	Comment noted.

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Letter 7: Eastern Municipal Water District			
7	A	Eastern Municipal Water District (EMWD) thanks you for the opportunity to review the Draft Environmental Impact Report for the above-referenced project, as described in the attached California Department of Water Resources copy of EIR, received September 12, 2016. EMWD understands the proposed improvements will include constructing a water conveyance facility to connect with the Perris Valley Channel in the event DWR executes an emergency drawdown to drain the reservoir. Also being proposed is a bridge overpass on Evans Road.	Comment Noted. This comment does not describe an inadequacy of the Draft EIR, and no further response is required
7	B	Please note that EMWD has multiple facilities at the intersection of Ramona Expressway and Evans Road which appear to be in conflict with the proposed improvements and would require to be relocated [15-inch sewer pipeline, 16-inch recycled water pipeline, and 24-inch water pipeline]. To ensure development of the site, you must proceed with adequate considerations of EMWD's existing facilities and easements. We suggest to the project proponent, to collaborate with EMWD staff by submitting and processing a Plan Check of the proposed improvements. The Plan Check process will help evaluate potential impacts on EMWD's facilities and identify proposed resolutions of utility conflicts. Please contact Armando Arroyo, Senior Civil Engineer, Plan Check section, at (951) 928-3777 ext. 4480. If you have any questions, please feel free to call me at (951) 928-377, extension 4450 or by e-mail at rodriguez@emwd.org.	Mitigation Measure UTIL-2 requires that DWR conduct an underground utilities search prior to construction activities. DWR will coordinate with EMWD in order to determine utility locations and potential relocation requirements.
Letter 8: Friends of Northern San Jacinto Valley			
8	A	We object to the California Department of Water Resources (DWR) Draft Environmental Impact Report for the Perris Dam Emergency Release Facility as individual citizens and on behalf of our conservation association the Friends of the Northern San Jacinto Valley (FNSJV). The Draft EIR disregards substantial evidence to the contrary that the Project is subject to Mandatory Finding of Significance pursuant to CEQA guideline section 15065. Consequently, the Draft EIR is able to avoid the analysis of impacts to Biological Resources and does not correctly consider the cumulative impacts of the Project on designated wildlife conservation lands and the numerous wildlife species those lands have been assigned to conserve.	CEQA requires the preparation of an EIR when certain specified impacts may result from a project. (See Pub. Resources Code, section 21083, subd. [b]; CEQA Guidelines, section 15065, subd. [a].) However, DWR prepared an EIR so commenter's comment regarding mandatory findings of significance is moot. Further, the Draft EIR evaluates potential cumulative impacts to biological resources on page 4-6. The analysis confirms that the proposed project would contribute to the reduction of natural habitats and open space. However, with implementation of Mitigation Measures BIO-1 through BIO-6, these impacts would be less than significant. The mitigation measures provide for impact avoidance, minimization and compensation sufficient to reduce the project's direct impact and contribution to the cumulative impact. As discussed in response to Comment 1H, Mitigation Measure BIO-2c has

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			been added to the Final EIR to ensure that a Restoration Plan is prepared and similar habitat values are maintained. See responses to Comments 1A through 1N that address the Wildlife Agencies' comments on the preservation of natural habitats and compliance with habitat conservation commitments.
8	B	The Draft EIR Project Description mistakenly refers to the Project site as the "**SRA segment**" and completely ignores/disregards the prior assignment of these lands as mitigation for wildlife losses resulting from the construction of the State Water Project (David-Dolwig Act). The "*Memorandum of Agreement (MOA) Regarding Mitigation of State Water Project (SWP) Wildlife Losses in Southern California*" dated October 23, 1979 is enclosed as an attachment to this comment letter. This document needs to be subjected to analysis in the Final EIR particularly as to the MOA term: "*Uses of these lands for other purposes will not be allowed if such use impinges upon the maintenance of wildlife populations, except as needed for SWP operations. If DWR requires any of these lands for SWP operations, DWR will replace such lands taken with other lands acceptable to DFG.*	The proposed project would construct a levee system within the Lake Perris SRA to convey release water from the emergency release structure to the Perris Valley Channel. The SRA property is managed for biological values. As described in the Recirculated Draft EIR on page 3.3-27, the levees within the SRA would be designed to support habitat used by small mammals. The levees would have a gentle slope and top soil suitable for burrowing. The proposed project would not result in less acreage available for small mammal habitat than currently exists. See also response to Comment 1H. Mitigation Measure BIO-2c was added to the Recirculated Draft EIR to ensure that the habitat restored on the levees is similar to or of better quality than the existing condition. With implementation of the mitigation measures, the proposed project would not reduce habitat values within the SRA.
8	C	In 1995, the lands in front of the Lake Perris Dam were included within the Stephen's kangaroo rat (SKR) "core" reserve pursuant to the federal/state Habitat Conservation Plan (SKRHCP). In 2004, the lands in front of Lake Perris Dam were also designated under the MSHCP as conservation lands [mitigation] allowing the federal and state "take" of endangered and special status species elsewhere in western Riverside County. Under state law both the SKR and MSHCP "take" permits were authorized pursuant to the Natural Communities Conservation Planning Act (NCCP Act – Fish and Game Code Section 2800-2835). Section 2826 of the NCCP Act provides: "*Nothing in this chapter exempts a project proposed in a natural community planning area from Division 13 (commencing with section 21000) of the Public Resources Code [CEQA] or otherwise alters or affects the applicability of that division.*	The Recirculated Draft EIR notes on page 3.3-26 through 3.3-29 that site surveys conducted within the proposed impact areas have documented that no listed species currently occupy the site. Therefore, the Recirculated Draft EIR concludes that the project would not be required to obtain coverage under an existing HCP or otherwise consult with wildlife agencies pursuant to the federal or state Endangered Species Acts. Mitigation Measure BIO-2a requires that additional surveys be conducted prior to the construction to confirm that the listed Stephen's kangaroo rat is not present. The mitigation measure is provided in an abundance of caution in case the small mammals occupy the site before construction begins. However, there are no requirements in any of the existing HCPs requiring compensation for unoccupied habitat within the SRA.
8	D	CEQA requires the identification of significant impacts to wildlife, analysis of alternatives to avoid or mitigate significant impacts, and requires the lead agency to make specific "Findings" regarding identified significant impacts to wildlife resources. The subject Draft EIR merely asserts direct, indirect, and cumulative impacts to endangered and special status species will "not be significant with mitigation" and there will be future consultation with the RCHCA or the RCA on "take" of the respective SKRHCP or MSHCP covered species. This is not CEQA compliance and the Draft EIR failure to comply with CEQA and the NCCP Act section 2826 requires explanation in the Final EIR. CDFW is the state Trustee Agency for fish and wildlife resources not the	The Recirculated Draft EIR does not require consultation with the RCA or RCHCA. Mitigation Measure BIO-2a provides for coordination with RCHCA in the event of an emergency release that inundates some portion of the SRA. CDFW is appropriately recognized as a Trustee Agency in the Recirculated Draft EIR. See response to Comments 8C and 1A through 1N.

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		RCHCA or the RCA (Fish and Game Code Section 1802).	
8	E	The prior Perris Dam Remediation Program Final EIR (November, 2011) called for the Lake Perris Outlet Tower Replacement because the existing Outlet Tower would fail in a significant earthquake. It is our understanding that this component of the Dam Remediation Program has not been funded or implemented to date. Should the present outlet tower fail/collapse as a result of a significant earthquake, a likely event given the seismicity of the project location, it would render the proposed Perris Dam Emergency Release Facility nonfunctional. In addition, the subject Draft EIR indicates the Perris flood control channel cannot accommodate a 3800 cfs emergency release. DWR needs to update the public in the Final EIR regarding the status of the Outlet Tower Replacement and to what extent will failure to replace the existing Outlet Tower compromise public safety. Thank you for the opportunity to indicate our concerns regarding this project. Please keep us informed regarding the availability of the Final EIR and any public meetings concerning this project.	The Lake Perris Outlet Tower Replacement component of the Perris Dam Remediation Program is not evaluated in the Draft EIR. The comment does not pertain to the content or adequacy of the Draft EIR. No further response is required. The Perris Valley Channel is not part of the proposed project, which is being designed to reduce public safety risks due to operation of the dam's emergency release facility. For this project, if an emergency release is required, the water would form its own overland channel and flood existing residential areas below the dam. The Emergency Release Facility Project is being proposed to reduce that risk to residential areas. The current emergency release facility already has a flow capacity of 3,800 cfs and the California Division of Safety of Dams requires that the new release facility maintain the same flow. As stated on page 2-5 of the Recirculated Draft EIR, DWR is preparing an Emergency Operations and Maintenance Manual that would outline procedures to control the release flows up to 3,800 cfs. Measures in the manual would help to minimize the possibility of inundating property adjacent to the Perris Valley Channel, until such time that Riverside County Flood Control District completes ultimate build-out of the Perris Valley Channel, which would then safely convey the full 3,800 cfs emergency release.
Letter 9: 46th District Agricultural Association – Lake Perris Fairgrounds			
9	A	The 46th District Agricultural Association (Southern California Fair) would like to thank you for the opportunity to review the Department of Water Resources "Draft" Environmental Impact Report for the proposed Perris Emergency Release Facility as it may apply and impact the proposed property of the 46th District Agricultural Association. The Notice of Preparation identifies the fairgrounds as Perris Fairgrounds, for point of record the official information regarding the fairgrounds is the following; 46th District Agricultural Association is owned and operated by the State of California, directed by California Department of Food and Agriculture and is a Division of Fairs and Expositions. We operate (doing business) under the name of Southern California Fair and Lake Perris Fairgrounds. EIR and Master Plan for the fairgrounds were adopted and approved by appropriate +parties in 1990. This includes the operation of annual fair, non-fair activities and events such as but not limited to (horse and livestock shows, motocross, auto racing, concerts, rodeos, and others. The EIR also addressed major impacts on the environment, which included public facility	This introductory comment does not include a specific inadequacy in the Draft EIR or raise an issue of noncompliance under CEQA. DWR acknowledges the variety of events held at the Fairgrounds and the importance of these events to the lease holders, local community, and State economy. The impacts alluded to in this introductory comment are elucidated in subsequent comments. Responses are provided in subsequent responses.

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		utilities, flooding, drainage, geological hazards capabilities with surrounding land use and impacts of noise, light, glare, traffic and other reportable and required Environmental Impact Reports. The 46th District Agricultural Association shall reply to the "Draft" EIR in two manners, first will be the comments submitted on the Notice of Preparation March 9th 2014, with any amendments to the comments highlighted in yellow, secondly identification of new concerns and comments to the EIR will be added as amended and identified this date. **COMMENTS PREVIOUSLY SUBMITTED (MARCH 9th, 2014)** The 46th District Agricultural Association its lease holders and annual fair will be significantly disturbed, impacted, events disrupted and economic malaise generated and created by the "Proposed Emergency Release Outlet" and all associated land acquisition, construction and bridge placements. The event impacted with the following annual attendance are: 1. Motocross (est. 1991) 72,500 2. Perris Auto Speedway (est.1996) 92,256 3. El Toro Huaco (est. 1992) (Hispanic Rodeo, Concerts) 148,500 4. Go-kart Track (est. 1999) 35,050 5. BMX (bicycle track) 30,000 6. California Department of Agriculture no public 4,000 7. Circus 12,000 8. Equestrian Shows 1,000 9. Livestock Demonstration 1,000 10. Dog Shows 2,750 11. Car Shows 15,000 12. Concerts 5,000 13. Community groups 2,500 14. Main office meetings 1,500 15. Home Show 10,000 16. Cell tower lease no public 17. Motorcycle training 3,500 18. Multiple practice events 10,000	

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		19. Camping at various events 7,500 *Operated and owned by the fair* *1. Southern California Fair 113,500* *2. Lake Perris Sports Pavilion 62,000* *3. Harrison Hall 27,500* The 46th District Agricultural Association will identify and provide our analysis of the significant impacts to the fair, fairgrounds, lease holders, attendees, stakeholders, and guests that utilize, visit and make a living, provide education, entertainment, showcase their products, and sell from the fairgrounds.	
9	B	**1. Land Acquisition-** Any and all significant changes in the property will result in domino affect that may cause a reconfiguration of event locals (motocross, parking, Hispanic rodeos, perris auto speedway and concerts with funds required to accomplish. Additionally, the fair market value of any land acquisition must include the economic impact, business interruption, and financial impact to the fair, lease holders, stakeholders and their business partners. The business interruption has impacted the fairgrounds as the motocross track recently closed due to impending emergency release plans.	See response to Comment 5B. This comment does not include a specific inadequacy in the Draft EIR or raise an issue of noncompliance under CEQA. The Draft EIR provides the project objectives on page 2-5. DWR asserts as lead agency for the project, that the need to protect public safety and property through implementation of the proposed project outweighs the impacts associated with the loss of a portion of the property available for community activities at the Fairgrounds.
9	C	**2. Primary Parking-** Proposed options include the acquisition of some primary parking for the emergency release outlet. This will impact multiple events with land alterations and traffic changes.	See response to Comment 5B.
9	D	**3. Engineering Review-** The fair has had engineering firm of Webb and Associates review the current proposals by DWR that was provided to DWR.	This comment does not include a specific inadequacy in the Draft EIR or raise an issue of noncompliance under CEQA. No further response is required. Responses to comments provided from Webb and Associates are included as comments 13AA through 13LL.
9	E	**4. Destination site-** Each event whether related to car, motorcycles, bicycles, go karts, concerts, fair, home shows, is driven by vastly different attendees and requires separate marketing strategies and expenditures to maximize their attendance. Interruption in ingress and egress would disrupt the integrity of	The comment does not raise an issue of noncompliance under CEQA and no further response is required.

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		each event, impact attendance and revenue streams to the vendors and the fair that may not be recoverable.	
9	F	**5. Construction Phase:** Construction is scheduled to being 2017 shall include the emergency release outlet (ditch) which will interrupt and significantly impact attendance and revenue streams all the aforementioned lease holders, fair, off track wagering with traffic ingress and egress problems and situations daily. This phase will last in excess of two years. Construction scheduling should include the nature of business's and the calendar months that they operate the most.	Comment noted. Construction of the emergency release facility within the Fairgrounds and Lake Perris Drive is anticipated to require up to 2 years of continuous activities and traffic impacts. The nature of construction activities is such that DWR is not able to accommodate all schedules. DWR is working with the Fairgrounds to ensure that construction activities would not occur during the Lake Perris Fairground's Southern California Fair, the fairgrounds' annual main event. Any other schedule interruptions would extend the construction schedule beyond the anticipated 2 years. Once constructed, access to the Fairgrounds would be similar to existing conditions. The Draft EIR provides the project objectives on page 2-5. DWR asserts as lead agency for the project, that the need to protect public safety and property through implementation of the proposed project outweighs the impacts during construction to ingress and egress of the Fairgrounds. Base on this comment, a more detailed discussion regarding potential closures during larger events in coordination with the Fairgrounds was added to the Recirculated Draft EIR, page 2-18 and throughout Chapter 3.14, Transportation and Traffic. The Recirculated Draft EIR concludes that the reduction in access and egress traffic lanes during construction would add to already congested traffic during large events at the Fairgrounds, resulting in significant and unavoidable traffic impacts. *Page 2-18 of the Recirculated Draft EIR* A box culvert system may be used to pass the emergency flow under Avalon Parkway (see Figure 2-7 for a graphic depiction of a box culvert). Construction of the box culvert is expected to close the access road for approximately 12 months with traffic diverted to Lake Perris Drive. <u>One lane of access would be maintained during larger Fairgrounds events, as needed, and would be determined in coordination with the Fairgrounds.</u>
9	G	**6. Bridge Construction:** Bridge construction identified required by DWR as a bridge over the emergency release outlet ditch connecting to Lake Perris Drive which provides entrance into fairgrounds and Lake Perris. Additional consideration design and construction must factor and include the size of vehicles and hauling or race cars, livestock trailers, concessionaire trailers, horse trailers, campers and motorhomes with specific loads, vehicle sizes and radius required to accommodate vehicles	The proposed bridges will be designed to accommodate all sizes of vehicles consistent with existing capacity and load conditions.

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9	H	**7. Bridge Gate A Fairway Drive (Avalon Parkway)-** Fairway Drive has been identified by the District to DWR that an additional "bridge" must be located at Fairway Drive to continue operations, ingress and egress for motocross, Perris auto speedway, Hispanic rodeo and concerts, fair exhibitors and egress for fair patrons. Additionally, the design of the bridges must incorporate and accommodate the large vehicles and vehicles that haul race cars, concessionaire trailers, livestock and horse trailers.	The proposed bridges will be designed to accommodate all sizes of vehicles consistent with existing capacity and load conditions. In addition, see response to Comment 9F for a discussion regarding access along Avalon Parkway (Fairway Drive).
9	I	**8. Department of General Services-** The 46th District Agricultural Association has initial discussions with their personnel as they should be involved in any land acquisition on State of California property or other significant agreements regarding State of California property.	The comment does not pertain to the adequacy of the Draft EIR or raise an issue of noncompliance under CEQA. Property acquisitions, if needed, would be conducted according to appropriate State of California procedures.
9	J	**9. Safety-** Safety is of utmost concern to the District and we're confident that DWR and associated contractors will take precautionary steps to protect the fairgrounds it's guests, stakeholders, children however there is a significant exposure and risks with the open ditch. Additionally fairgrounds has thousands of children crossing the property.	The proposed emergency release facility would be inaccessible to the general public except for areas of the Dual-use Alternative along the Fairgrounds Segment where the slopes would not impede access or egress. Impacts to public safety would be avoided by adequately fencing the project during and after construction, as needed.
9	K	**10. Motocross-** Motocross may be the most directly impacted lease holder on the property with proposed land acquisition, redesign and alteration of the current motocross track. Principal owner and operator Mr. Mark Peters (premier track designer and builder in the world) states that altering and or minimizing the land, changing the track design of the motocross track would "bankrupt" them. The comments provided in March of 2014 identified and predicted the closure of motocross, however the fairgrounds did not anticipate motocross closing prior to the beginning of construction and subsequently the significant loss of revenue is occurring due to the pending construction.	See response to Comment 5B.
9	L	**11. Perris Auto Speedway-** Perris Auto Speedway has provided their comments and observations regarding the emergency release outlet directly to Department of Water Resources.	See responses to Comments 11A-11GG.

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9	M	**12. Department of Food and Agriculture/Division of Fairs and Expositions-** The 46th DAA is governed and operated by the State of California, thru the direction of California Department of Food and Agriculture, and the Division of Fairs and Exposition. The 46th DAA has provided information contacts and introduced DWR personnel to Division of Fairs and Exposition key personnel to begin conversation by and between State agencies to better resolve the State of California.	DWR appreciates the coordination between State agencies and looks forward to continuing to work with the Fairgrounds on this important public safety project.
9	N	**13. Electronic message center-** Electronic message center may need to be relocated for the emergency release outlet, concern and impact would be significant if the message center was relocated a greater distance from Ramona expressway. Large and more visible message center may be required to maintain the same visual impressions.	As stated on page 2-16 of the Recirculated Draft EIR, the sign would be removed during construction, but DWR would ensure that the sign is relocated and connected after construction to its pre-project condition. In addition, it is stated the final reconfiguration and reconnection of the sign would be determined in coordination with the Fairgrounds.
9	O	**14. Sewer lift station-** The lift station and primary sewer line may be relocated within the emergency release outlet will require additional review and study.	The Draft EIR acknowledges on page 3.12-18 that public utilities including the sanitary sewer facilities will require reconfiguration to accommodate the proposed emergency release facility. DWR has coordinated with the City of Perris/EMWD regarding the potential for reconfiguration of the sewer lift facilities. Through this coordination it has been determined that any reconfigured wastewater facilities will occur concurrent with construction of the ERF, and within the same project footprint. No new areas of impact, that have not already been review in the Draft and Recirculated Draft EIR, will occur as a result of these modifications. No additional CEQA analysis is required to move the lift station and sewer connection.
9	P	**15. Construction work schedule-** If in fact that construction is ongoing on the fairgrounds and bridge consideration should be given for the somewhat seasonal nature of business's on the property with prime ingress and egress of activities defined with fair and fairground renters.	The comment does not raise an issue of noncompliance under CEQA. Note, however, that the Recirculated Draft EIR concludes on page 3.14-27 that the project would result in significant unavoidable impacts to traffic under either construction scenario. The traffic analysis was supported by a Traffic Technical Study, included as Appendix F. Mitigation Measure TRANS-1 was developed with input from the Traffic Technical Study to mitigate impacts to traffic through re-striping of turning lanes and modifying signalization to facilitate traffic. The Recirculated Draft EIR acknowledges that the significant impacts to traffic are unavoidable. See response to Comment 9F.
9	Q	**16. Economic Impact of lease holders-** The economic impact of construction, closing points of primary entrance to the fairgrounds will significantly impact each event by less paid gate fees and attendance, less spending on food and beverage, less funding paid to	The comment does not raise an issue of noncompliance under CEQA or address the adequacy of the Draft EIR. See response to Comments 5B and 9F.

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		vendors, less parking revenues, less spin off spending and subsequently less revenue generated and paid to 46th DAA. Analysis indicates that this may in the ranges of 30% to 50%. Less revenue to the lease holders and paid to the fairgrounds, the larger revenue generating leases are smaller flat fees with percentages paid to fair will be significant less.	
9	R	1**7. Satellite Wagering (off track wagering)-** Satellite Wagering is a generational sport with a larger share of the audience and attendees being older demographics, any changes at the facility including ingress and egress of the access to the fairgrounds and facility would disrupt their patterns and result in decreased attendance, funds wagered, decreased revenues to the fair.	The comment does not raise an issue of noncompliance under CEQA or address the adequacy of the Draft EIR.
9	S	**18. Business Interruption-** Interruption of business to the lease holders and the fair will be significant during the two year construction period. Analysis and comments from lease holders indicate that loss of business and revenue may exceed 50%. This will result in significant decrease of income paid by lease holders to the fair.	The comment does not raise an issue of noncompliance under CEQA or address the adequacy of the Draft EIR.
9	T	**19. Economic Impact- Perris Valley Area** Annual fair and non-fair activities generate millions of dollars into the community in the way of employment, restaurants, gas and motels not to mention the business that are supported by the events. The estimates may be in excess of 8 million for the annual fair and another 10 million for the non-fair lease activities. Any significant disruption in these events will have a major impact that will cause economic worsening by the vendors and Perris area business owners and operators.	The comment does not raise an issue of noncompliance under CEQA or address the adequacy of the Draft EIR. See response to Comment 9F.
9	U	**20. Southern California Fair-** The fair is annually held in October and attendees exceed well over 100,000 visitors. The mission of the annual fair is “Provide for the education, entertainment and presentation of youth livestock and exhibits”. The annual budget for the fair approaches One million dollars for operational expenditures with a large economic impact to the Perris area. Additionally, the fair like most business in the past years the fair proper is in a rebuilding mode and any changes to this would cause significant damage and lessen attendance and revenue. Also, the fair provides (sells) locations to hundreds of vendors (food, commercial vendors) who sell their food, beverage and wares to the attendees, any decrease in attendance due to construction will result in	The comment does not raise an issue of noncompliance under CEQA or address the adequacy of the Draft EIR. See response to Comment 9F.

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		significant reduction in sales for the fair and subsequent decrease of income to the fair. Rebuilding the vendor base due to the aforementioned would be difficult if not impossible with the fair industry.	
9	V	**21. Summary-** The fairgrounds and all lease holders have annual attendance over 700,00 people visiting or attending multiple events located on the fairground proper. The "destination facility" (fairgrounds) proposed changes to the property by DWR scope of work for an emergency release outlet will dramatically and significantly have a direct economic and indirect economic impact to the fair, lease holders, guests, visitors, participants and stakeholders. The economic instability that this will cause shall not only occur during the construction phases of the emergency outlet but will significantly alter the attendance and revenue streams to the fair, fairgrounds lease holders and the economic impact to the surrounding Perris Valley area. Subsequently, we respectfully request that Department of Water Resources review all of the enclosed information accordingly and plan for same with the 46th District Agricultural Association, lease holders and the public that utilizes the fairgrounds for their education, entertainments and own and operate business.	The comment does not raise an issue of noncompliance under CEQA or address the adequacy of the Draft EIR.
9	W	**ADDITIONAL NEW COMMENTS "DRAFT EIR" OCTOBER 24TH, 2016** **DUAL USE-** The "Draft" EIR indicates dual use by and between DWR and the 46th District Agricultural Association is feasible. However feasible multiple concerns include the maintenance of channel, environmental exposure from vehicles, parking, public use and liability, right of way and other possible items for discussion.	Maintenance of the channel would be conducted by DWR or the RCFCWCD as determined in a joint use agreement. The project would not increase public exposure to vehicles, parking, public use, right of way. The proposed dual use facility would function similar to the existing parking lot. See response to Comments 2C and 5B.
9	X	**BUSINESS INTERRUPTION –** The fair must continue to stress the importance of the significant business interruption that the construction, bridge building, traffic plan, utilities and project will have (currently one renter – motocross) has made the decision to close due to the pending and unknown consequences that emergency release outlet plans and pending construction has created. Additionally, other renters have began reviewing business plans and adjust accordingly. Revenue to the fairgrounds is decreasing without implementation as of this	See response to Comment 5B. The comment does not raise an issue of noncompliance under CEQA or address the adequacy of the Draft EIR. The Draft EIR provides the project objectives on page 2-5. DWR asserts as lead agency for the project, that the need to protect public safety and property through implementation of the proposed project outweighs the environmental impacts to local businesses caused by construction to the Fairgrounds.

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		writing and we anticipate "significant impact" to further reduce business and revenue to the fair.	
9	Y	**UTILITIES-** The "draft EIR" indicates that there may be unknown closures due to utilities that are not identified may cause interruption in services. We request that additional study be performed as to identify possible utilities prior to the movement of on facilities.	The Draft EIR discusses replacement of underground utilities on page 3.12-4. Mitigation Measure UTIL-2 requires that DWR conduct an underground utilities search prior to construction activities. DWR would coordinate with utility providers and customers prior to disruption of service. The Draft EIR concludes that impacts from disruption of service would be temporary and done in coordination with customers to minimize impacts.
9	Z	**TRAFFIC-** Traffic to SRA and the fairgrounds is a significant part of Ramona Expressway and ingress/egress will have significant impacts to the attendees to the previously identified events located therein, subsequently the fairgrounds continues to stress the importance of timing of construction, scheduling of all work, planning and further study of traffic and parking plans for SRA and the fairgrounds.	The Recirculated Draft EIR acknowledges that construction will affect traffic including ingress and egress to the Fairgrounds. As part of the proposed project, DWR would prepare a Traffic Management Plan to ensure that traffic impacts including ingress and egress to the Fairgrounds are minimized. Implementation of the plan would minimize impacts. See response to Comment 9F.
9	AA	**EMERGENCY RELEASE OF WATER-** In the event of emergency release of water the fairgrounds has significant concern regarding vehicles parked or on the dual occupancy area and how release of water may impact vehicles in the area.	The emergency release facility would only be used in the event of an emergency. As shown on Figure 3.9-3 of the Draft EIR, the Fairgrounds' inundation area would be reduced by the implementation of the proposed project in the event of an emergency release. Further, DWR will prepare an Emergency Operations and Maintenance Manual as part of the project. The manual will include coordination requirements with the Fairgrounds and emergency response entities. Normal stormwater flows would be conveyed within the storm flow portion of the channel. See response to Comment 5B.
9	BB	**DUAL ENVIRONMENTAL & MATERIALS** Not identified within the "draft EIR" is information or mention of the dual sharing of land and the potential concerns or environmental impact that vehicles parked on earthen areas (gas, oil, brake fluid, others fluids) that may be on property. Is this potentially problematic or minim and of no concern.	The dual use of the area (under the proposed Dual-use Alternative) would not alter its current use. The project would introduce no more vehicles than what already utilize the area. In addition, current runoff from the existing parking areas is conveyed to the same ultimate drainage along Ramona Expressway connecting to the Perris Valley Channel. There would be no change. Impacts to water quality would not be increased. See response to Comment 5B.
9	CC	**DUAL PROPERTY SHARING LIABILITY-** DWR and fairgrounds require discussion of liability for shared land utilization prior to completion of property.	This comment does not raise an issue of noncompliance under CEQA. However, DWR appreciates the need to coordinate with the Fairgrounds to discuss the channel options through the Fairgrounds Segment (as presented in the Recirculated Draft EIR).
9	DD	**SUMMARY OF ADDITIONAL ITEMS** We discussed multiple new items or expounded on others including dual use, business interruption, utilities, traffic, emergency release of water, dual	The comment does not raise an issue of noncompliance under CEQA or address the adequacy of the Draft EIR. No further response is required.

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		sharing and environmental areas and dual sharing and liability. Previously identified the fairground has annual attendance over 700,000 people visiting or attending multiple events located on the fairgrounds proper. Economic impacts that this will cause shall not only occur during the construction phases of the emergency release outlet but will significantly alter the attendance and revenue streams to the fair, fairgrounds lease holders and the economic impact to the surrounding Perris Valley area motels, gas stations, restaurants and other business from related events. We respectfully request that Department of Water Resources review all of the enclosed information accordingly.	
Letter 10: Pechanga Cultural Resources, Temecula Band of Luiseno Mission Indians			
10	A	This comment letter is written on behalf of the Pechanga Band of Luiseño Indians (hereinafter, "the Tribe"), a federally recognized Indian tribe and sovereign government. The Tribe formerly requests, pursuant to Public Resources Code Section 21092.2, to be notified and involved in the entire CEQA environmental review process for the duration of the above referenced project (the "Project"). Please add the Tribe to your distribution list(s) for public notices and circulation of all documents, including environmental review documents, archaeological reports, and all documents pertaining to this Project. The Tribe further requests to be directly notified of all public hearings and scheduled approvals concerning this Project. Please also incorporate these comments into the record of approval for this Project. The Tribe understands that the proposed project would modify the current emergency release structure by removing the existing bulkhead and replacing it with one or more automated valves. We also understand that the project is composed of three distinct sections. The SRA segment would have two levees, the Main Levee and the North Training Levee. The Main Levee would be approximately 6,000 feet long, up to 10 feet high, and up to 87 feet wide at the bottom with 3:1 slopes. The North Training Levee would be approximately 685 feet long, up to 8 feet high and up to 60 feet wide at the bottom with 3:1 slopes. All levees will be constructed within native soils and if improvements are required, a temporary trench would be excavated and then backfilled to improve the foundation. The Fairgrounds segment will have a 320 foot-wide unlined trapezoid channel, which will have a depth of 25 feet on the east and up to 11 feet depth on the west end. The Western segment would be developed as an unlined, earthen trapezoidal channel, which would be approximately 2,500 feet long, with a 120-foot top width and 80-foot bottom, and nine feet deep with 2:1 side slopes.	Comment noted. The Pechanga Tribe has been added to the project's distribution list for further notification regarding notices, documents, and public meetings associated with the proposed project. The comment does not raise an issue of noncompliance under CEQA or address the adequacy of the Draft EIR.

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		The Tribe submits these comments concerning the Project's potential impacts to cultural resources in conjunction with the environmental review of the Project. The Tribe previously submitted comments and consulted directly with the California Department of Water Resources (DWR) on the sensitivity of the Project and its possible impacts to cultural resources. Additionally, our Tribal Monitor Loren Garcia participated in the cultural resources survey of the project area, along with ESA in 2014.	
10	B	After review of the Draft Environmental Impact Report, Pechanga has three main concerns. First, the Ethnographic Section clearly identifies that the Project area is within Luiseño territory. However, there is also a section on the Cahuilla, and a territory description that does not include the Lake Perris area. While we understand that Morongo submitted comments on the Project, the DEIR does not indicated whether they submitted specific comments and concerns regarding impacts to potential Tribal Cultural Resources. If they did, this information needs to be included in the DEIR. Otherwise, we suggest removing the Cahuilla section from the document.	Although the Morongo Tribe has not provided specific comments on the Draft EIR, the Morongo Tribe was actively involved in consultation with DWR. The Morongo Tribe also expressed interest and concerns for cultural resources in the area during the consultation. The Soboba Tribe also consulted with DWR.
10	C	Secondly, the DEIR does not include information on the new amendment to CEQA, AB 52. Although this Project does not meet the requirements to consult under AB 52, nevertheless, it is a part of the CEQA process and an information paragraph should be included in the Regulatory Framework section. Additional information is presented below.	In response to this comment, the following was added to the regulatory section of Chapter 3.4 on page 3.4-16 of the Recirculated Draft EIR: *Page 3.4-16 of the Recirculated Draft EIR* ***California Public Resources Code Section 21080.3.1, as amended by Assembly Bill 52*** California PRC Section 21080.3.1, as amended by Assembly Bill (AB) 52 requires lead agencies to consider the effects of projects on tribal cultural resources and to conduct consultation with federally and nonfederally recognized Native American Tribes early in the environmental planning process, and applies specifically to projects for which a Notice of Preparation (NOP) or a notice of Negative Declaration or Mitigated Negative Declaration (MND) will be filed on or after July 1, 2015. The goal of PRC Section 21080.3.1 is to include California Tribes in determining whether a project may result in a significant impact to tribal cultural resources that may be undocumented or known only to the Tribe and its members. This bill specifies that a project that may cause a substantial adverse change in the significance of a tribal cultural resource (sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe) is a project that may have a significant effect on the environment. PRC Section 21080.3.1defines tribal cultural

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			resources as "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe" that are either included or determined to be eligible for inclusion in the California Register or included in a local register of historical resources (PRC Section 21074 (a)(1)). PRC Section 21080.3.1requires that prior to determining whether a Negative Declaration, MND, or Environmental Impact Report (EIR) is prepared for a project, the lead agency must consult with California Native American Tribes, defined as those identified on the contact list maintained by the NAHC, who are traditionally and culturally affiliated with the geographic area of the proposed project, and who have requested such consultation in writing. The following is what the scope of consultation may include according to PRC Section 21080.3.2(a): • The type of environmental review necessary • The significance of tribal cultural resources • The significance of the project's impacts on the tribal cultural resources • Project alternatives or the appropriate measures for preservation • Recommended mitigation measures PRC Section 21080.3.1 outlines the required procedures concerning consultation (PRC §21080.3.1(d) and (e)) including the initiation and conclusion of consultation. Consultation should be initiated by a lead agency within 14 days of determining that an application for a project is complete or that a decision by a public agency to undertake a project. The lead agency shall provide formal notification to the designated contact of, or a tribal representative of, traditionally and culturally affiliated California Native American Tribes that have requested notice. At the very least the notice should consist of at least one written notification that includes a brief description of the proposed project and its location, the lead agency contact information, and a notification that the California Native American Tribe has 30 days to request consultation pursuant to this section. The lead agency shall begin the consultation process within 30 days of receiving a California Native American Tribe's request for consultation. According to PRC Section 21080.3.2(b), consultation is considered concluded when either the parties agree to measures to

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			mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource, or a party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. For a summary of Native American outreach that was conducted for this project, please see the discussion under "Native American Contact" on page 3.4-9.
10	D	Finally, Pechanga is disappointed in the lack of Tribal involvement in almost all aspects of the proposed mitigation measures. Pechanga Cultural Resources Department, including the monitoring program, has been formally organized since 1999, with tribal monitoring occurring for several decades before then by our elders. Our tribal monitors are professionally trained and provide a necessary service that is distinct from a cultural point of view – a skill set that a non-Native archaeologist is simply incapable of utilizing. In fact, we have many examples where our tribal monitors have identified resources missed on misidentified by an archaeological monitor. Using these special skills, our monitors strive to protect the People including their places and things that once flourished in this area. As drafted, the mitigation only "invites" a tribal monitor to be present during ground-disturbing activities. It is imperative that a tribal monitor not only be present to ensure sensitive and irreplaceable cultural resources are appropriately identified and protected, but to be professionally contracted, acknowledging that they are providing a specialized, professional service. Given the sensitivity of the Project area which is clearly stated by the Project archaeologist and in the DEIR, it is the position of the Pechanga Tribe that Pechanga tribal monitors should be required for all ground-disturbing activities conducted in connection with the Project, including any additional archaeological excavations performed, as well as part of the sensitivity training that will be done for the construction personnel.	DWR conducted consultation with the Pechanga Tribe, as well as the Soboba Tribe and Morongo Tribe, as described on pages 3.4-9 and 3.4-10 of the Recirculated Draft EIR, and a provision for tribal monitoring was included in Mitigation Measure CUL-2. However, the measure has been modified to indicate that the monitor shall be a Native American representative from a tribe that is culturally and traditionally affiliated with the project area (see response to Comment 10J). In addition, Mitigation Measure CUL-1 has been modified to include tribal participation in sensitivity training for construction personnel (see response to Comment 10I).
10	E	**THE CALIFORNIA DEPARTMENT OF WATER RESOURCES MUST INCLUDE INVOLVEMENT OF AND CONSULTATION WITH THE PECHANGA TRIBE IN ITS ENVIRONMENTAL REVIEW PROCESS** It has been the intent of the Federal Government and the State of the California that Indian tribes be consulted with regard to issues which impact cultural and spiritual resources, as well as other governmental concerns. The responsibility to consult with Indian tribes stems from the unique government-to-government relationship between the United States and Indian tribes. This arises when tribal interests are affected by the actions of governmental agencies and departments. In this case, it is undisputed that the project lies	See response to Comments 10B and 10D.

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		within the Pechanga Tribe's traditional territory. Therefore, in order to comply with CEQA and other applicable Federal and California law, it is imperative that the California Department of Water Resources consult with the Tribe in order to guarantee an adequate knowledge base for an appropriate evaluation of the Project effects, as well as generating adequate mitigation measures.	
10	F	Additionally, as mentioned in our letter above, the DEIR does not mention AB52 in Section 3.4.2 Regulatory Setting subsection State. As you know, effective July 1, 2015, CEQA was amended to include an entirely new category of resources, "Tribal Cultural Resources" (TCR). The report only cites to the CEQA Guidelines provisions regarding the significance of impacts to archaeological and historical resources, while failing to mention "TCR" new category of resources. In order to accurately reflect the regulatory framework, the DEIR should be updated to include reference to these changes in law.	See response to Comment 10C.
10	G	**REQUESTED TRIBAL INVOLVMENT AND MITIGATION** The proposed Project is on land that is within the traditional territory of the Pechanga Band of Luiseno Indians. Pechanga is not opposed to this Project; however, we are opposed to any direct, indirect and cumulative impacts this Project may have to tribal cultural resources. The Tribe's primary concerns stem from the Project's proposed impacts on Native American cultural resources. The Tribe is concerned about both the protection of unique and irreplaceable cultural resources, such as Luiseño village sites, sacred sites and archaeological items which would be displaced by ground disturbing work on the Project, and on the proper and lawful treatment of cultural items. Native American human remains and sacred items likely to be discovered in the course of the work.	The results of the Phase I Cultural Resources Study prepared for the project, which included archival research, Native American outreach, geoarchaeological review, and pedestrian survey, did not result in the identification of cultural resources in the project area; however, the project area was found to be moderately sensitive for the presence of subsurface resources, which could be encountered during ground disturbing activities. Mitigation Measures CUL-1, CUL-2, and CUL-3 of the Recirculated Draft EIR require cultural resources sensitivity training, monitoring, and avoidance and preservation inadvertent discoveries, or treatment of discoveries if it is determined that they cannot be avoided, would ensure that impacts to these types of resources would be less than significant and would follow all applicable laws and regulations. Revisions to original Draft EIR mitigation measures and additional mitigation measures were included in the Recirculated Draft EIR in order to adequately address Tribal concerns regarding the sensitivity of the project area (see response to Comments 10I, 10J, 10L, 10M, 10N, and 10O)
10	H	After review of the DEIR and based on the known sensitivity of the Project area, Pechanga highly recommends revisions to the proposed mitigation measures including to require a Sensitivity Training module for the construction personnel presented by the Project archaeologist and a Pechanga representative, as well as compensation for professional tribal monitoring services for all proposed earthmoving activities. As stated above, the Pechanga Tribal monitors provide a professional service, one that we are mandated to do by the Pechanga People and which is taken very seriously,	See responses to Comments 10I and 10J.

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		as the monitoring process is often the last anyone will observe of the Ancestors, their Places and their Things. While the Tribe appreciates the opportunity to monitor projects within its ancestral territory, in order to be respectful of the professional services provided by Pechanga, a sovereign tribal government, compensation should be integral to the contracting process. We request that these measures be incorporated into the final EIR and any other final environmental documents approved by the Department of Water Resources (underlines are additions, strikethroughs are deletions).	
10	I	**CUL-1:** ~~Construction personnel shall be trained in the identification of cultural resources.~~ Prior to earthmoving activities, cultural resources sensitivity training shall be presented to all construction personnel. The training will be conducted by a qualified archaeologist (meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology [U.S. Department of the Interior, 2008]), or an archaeologist working under the direction of the qualified archaeologist, along with a Native American representative from a tribe that is culturally and traditionally affiliated with the project area. Construction personnel shall be informed of the types of ~~archaeological~~ cultural resources that may be encountered, and ~~of the proper procedures to be enacted in the event of an inadvertent discovery of archaeological resources or human remains~~, to bring awareness to personnel of actions to be taken in the event of a cultural resources discovery and safety procedures to be followed when working in close proximity to archaeological or tribal monitors. DWR shall ensure that all construction personnel are made available for and attend the training and retain documentation demonstrating attendance.	In response to the comment, Mitigation Measure CUL-1 was modified as follows in the Recirculated Draft EIR: *Page 3.4-20 of the Recirculated Draft EIR* **CUL-1:** ~~Construction personnel shall be trained in the identification of cultural resources.~~ Prior to earthmoving activities, cultural resources sensitivity training shall be presented to all construction personnel. The training will be conducted by a qualified archaeologist (meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology [U.S. Department of the Interior, 2008]), or an archaeologist working under the direction of the qualified archaeologist, along with a Native American representative from a tribe that is culturally and traditionally affiliated with the project area. Construction personnel shall be informed of the types of ~~archaeological~~ cultural resources that may be encountered, and ~~of the proper procedures to be enacted in the event of an inadvertent discovery of archaeological resources or human remains~~ to bring awareness to personnel of actions to be taken in the event of a cultural resources discovery and safety procedures to be followed when working in close proximity to archaeological or tribal monitors. DWR shall ensure that all construction personnel are made available for and attend the training and retain documentation demonstrating attendance.
10	J	**CUL-2:** An archaeological monitor (working under the direct supervision of a qualified archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology [U.S. Department of the Interior, 2008]) shall be present during ~~initial~~all ground-disturbing activities to assess subsurface conditions. ~~A Native American monitor shall be invited to be present.~~ Based on observations made by the archaeological and Pechanga Tribal monitors, monitoring activities may be modified at the recommendation of the qualified archaeologist in	In response to this comment, Mitigation Measure CUL-2 was modified as follows in the Recirculated Draft EIR: *Page 3.4-20 of the Recirculated Draft EIR* **CUL-2:** An archaeological monitor (working under the direct supervision of a qualified archaeologist ~~meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology [U.S. Department of the Interior, 2008]~~) shall be present during ~~initial~~

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		coordination with the Pechanga and Tribal Monitor and ~~coordination~~ with DWR. Any newly discovered cultural resources shall be subject to a cultural resources evaluation pursuant to state law by the Project archaeologist, the DWR and the Pechanga Tribe, prior to the start of grading. The cultural resources evaluation shall be detailed in a Cultural Resources Mitigation Monitoring Plan ("CRMP"). The CRMP, among other topics, shall document the proposed methodology for inadvertent finds, the state law process applicable to discovered human remains, the grading activity observation process, the mitigation measures and conditions of approval for the Project, in accordance with the Pechanga Tribe's Treatment Agreement required in CUL-3.	all ground-disturbing activities ~~to assess subsurface conditions~~ related to the project. A Native American representative from a tribe that is culturally and traditionally affiliated with the project area ~~monitor~~ shall be invited to ~~be present~~ participate in the monitoring effort. Based on observations made by the archaeological and ~~Native American~~ Tribal monitors, monitoring activities may be modified (i.e. reduced or discontinued) at the recommendation of the qualified archaeologist in coordination with the Tribal Monitor and DWR. Archaeological and Tribal monitors shall have the authority to stop and redirect grading in the immediate area of all discoveries (within 100 feet) until they can be evaluated and appropriate next steps determined in accordance with procedures and protocols outlined in Mitigation Measure CUL-3.
10	K	**CUL-3:** At least thirty (30) days prior to the first of either: seeking a grading permit or starting any operations that will have an effect of ground disturbance, the project Applicant shall contact the Pechanga Tribe to notify the Tribe of its intent to pull permits for the proposed grading and excavation, or to start any ground disturbing activities and to coordinate with the Tribe to develop a Cultural Resources Treatment and Monitoring Agreement ("Agreement"). The Agreement shall address the treatment of known cultural resources: the treatment and final disposition of any tribal cultural resources, sacred sites, human remains or archaeological resources inadvertently discovered on the project site; project grading, ground disturbance and development scheduling; the designation, responsibilities, and participation of professional Pechanga Tribal Monitor(s) during grading, excavation and ground disturbing activities; and compensation for the Pechanga Tribal Monitors, including overtime, weekend rates, and mileage reimbursements. The Pechanga Tribal Monitors shall have similar authority to the archaeological monitors, including the authority to stop and redirect grading in the immediate area of a find in order to evaluate the find and determine the appropriate next steps in consultation with the project archaeologist. Such evaluation shall include culturally appropriate temporary and permanent treatment pursuant to the Agreement, which may include avoidance of cultural and archaeological resources, in-place preservation, or re-burial on the project property in an area not subject to future disturbances for preservation in perpetuity. The reburial of any cultural resources shall occur in a location agreed to by the landowner and the Pechanga Tribe, the details of which shall be	The Pechanga Tribe, the Soboba Tribe, and Morongo Tribe have all expressed an interest in the project and cultural resources in the area, and the area was a shared use area between the Luiseño and Cahuilla (see response to Comment 10B). In addition to the Pechanga Tribe, the Soboba Tribe and Morongo Tribe have indicated an interest in the treatment and disposition of cultural resources and human remains discoveries. In the event that human remains are discovered, the California Native American Heritage Commission would identify and assign a Most Likely Descendant, who would be responsible for determining the treatment and disposition of any human remains and associated items in coordination with the landowner. Mitigation Measure CUL-2 has been modified to include provisions for archaeological and Tribal monitors to halt and redirect equipment from discoveries until they can be evaluated and appropriate next steps determined (see response to Comment 10J). Mitigation Measure CUL-3 as modified in the Recirculated Draft EIR (see response to Comment 10L) includes provisions for DWR to consult with appropriate Native American representatives in determining treatment for prehistoric or Native American resources.

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		addressed in the Agreement. Treatment may also include curation of the cultural resources at the Pechanga Tribe's curation facility.	
10	L	**CUL-~~3~~4:** In the event of the unanticipated discovery of archaeological materials, DWR shall immediately cease all work activities in the area (within approximately 100 feet) of the discovery until it can be evaluated by a qualified archaeologist, a Pechanga Representative and Project Applicant and meet and confer regarding the appropriate treatment (i.e., preservation, avoidance, and /or mitigation for the resources). Cultural and archaeological resources are inadvertent discoveries when they were not anticipated to be found during the Project's activities. This may include previously unknown sacred sites and items, midden deposits, artifact, hearths, bedrock outcrops, human remains and other resources, etc. ~~Prehistoric archaeological materials might include obsidian and chert flaked-stone tools (e.g., projectile points, knives, scrapers) or tool-making debris; culturally darkened soil (midden) containing heat-affected rocks, artifacts, or shellfish remains; and stone milling equipment (e.g., mortars, pestles, handstones, or milling slabs); and battered stone tools, such as hammerstones and pitted stones.~~ Historic-period materials might include stone or concrete footings and walls; filled wells or privies; and deposits of metal, glass, and/or ceramic refuse. Construction shall not resume until the qualified archaeologist has conferred with DWR on the significance of the resource. ~~If it is determined that the discovered archaeological resource constitutes a historical resource under CEQA, avoidance and preservation in place is the preferred manner of mitigation.~~ Consistent with California Public Resources Code Section 21083.2(b) and Assembly Bill 52 (Chapter 532, Statutes of 2014), avoidance shall be the preferred method of preservation for tribal cultural resources and archaeological resources. Preservation in place maintains the important relationship between artifacts and their archaeological and cultural context and also serves to avoid conflict with traditional and religious values of groups who may ascribe meaning to the resource. Preservation in place may be accomplished by, but is not limited to, avoidance, incorporating the resource into open space, ~~capping,~~ or deeding the site into a permanent conservation easement. In the event that preservation in place is demonstrated to be infeasible and data recovery through excavation is the only feasible mitigation available as agreed upon by the Project archaeologist, the Pechanga Tribe and the Project Applicant/landowner, measures outlined in the CRMP~~, a Cultural~~	In response to this comment, Mitigation Measure CUL-3 was modified as follows in the Recirculated Draft EIR: *Page 3.4-20 of the Recirculated Draft EIR* **CUL-3:** In the event of the unanticipated discovery of archaeological materials, DWR shall immediately cease all work activities in the area (within approximately 100 feet) of the discovery until it can be evaluated by ~~a~~ the qualified archaeologist, in coordination with appropriate Native American representatives who are culturally and traditionally affiliated with the project area, and DWR. Cultural and archaeological resources are inadvertent discoveries when they were not anticipated to be found during the project's activities. This may include previously unknown sacred sites and items, midden deposits, artifacts, hearths, bedrock outcrops, human remains and other resources, etc. ~~Prehistoric archaeological materials might include obsidian and chert flaked-stone tools (e.g., projectile points, knives, scrapers) or tool-making debris; culturally darkened soil (midden) containing heat-affected rocks, artifacts, or shellfish remains; and stone milling equipment (e.g., mortars, pestles, handstones, or milling slabs); and battered stone tools, such as hammerstones and pitted stones.~~ Historic-period materials might include stone or concrete footings and walls; filled wells or privies; and deposits of metal, glass, and/or ceramic refuse. Construction shall not resume until the qualified archaeologist has conferred with DWR on the significance of the resource. ~~If it is determined that the discovered archaeological resource constitutes a historical resource under CEQA, avoidance and preservation in place is the preferred manner of mitigation.~~ Consistent with California Public Resources Code Section 21083.2(b), avoidance and preservation in place shall be the preferred method of treatment for archaeological resources that meet the criteria for historical resources (CEQA Guidelines Section 15064.5(a)) and/or unique archaeological resources (California Public Resources Code Section 21083.2(g)). Preservation in place maintains the important relationship between artifacts and their archaeological and cultural context and also serves to avoid conflict with traditional and religious values of groups who may ascribe

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		~~Resources Treatment Plan~~ shall be ~~prepared and~~ implemented by ~~a qualified~~ the Project archaeologist in consultation with DWR and the Pechanga Tribe, that provides for the adequate recovery of the ~~scientifically consequential information contained in the~~ archaeological resource and accounts for any tribal concerns as expressed in the consultation process described above. DWR shall consult with the Pechanga Tribe and appropriate Native American representatives in determining treatment for prehistoric or Native American resources as outlined in CUL-7 ~~to ensure cultural values ascribed to the resource, beyond that which is scientifically important, are considered~~.	meaning to the resource. Preservation in place may be accomplished by, but is not limited to, avoidance, incorporating the resource into open space~~, capping,~~ or deeding the site into a permanent conservation easement. In the event that preservation in place is demonstrated to be infeasible and data recovery through excavation is the only feasible mitigation available, as agreed upon by the qualified archaeologist, Native American representative(s), and DWR, a Cultural Resources Treatment Plan shall be prepared and implemented by ~~a~~ the qualified archaeologist in consultation with Native American representative(s), and DWR that provides for the adequate recovery of the ~~scientifically consequential information contained in the~~ archaeological resource and accounts for any tribal concerns as expressed in the consultation process described above. DWR shall consult with appropriate Native American representatives in determining treatment only for prehistoric or Native American resources ~~to ensure cultural values ascribed to the resource, beyond that which is scientifically important, are considered~~.
10	M	**CUL-5:** If human remains are encountered, consistent with California Health and Safety Code Section 7050.5, no further disturbance shall occur until the [Appropriate] County Coroner and has made the necessary findings as to origin of the remains. Further, consistent with California Public Resources Code Section 5097.98(b), human remains shall be left in place and free from disturbance until a final decision as to the treatment and disposition has been made. If the Riverside County Coroner determines the remains to be Native American, the Native American heritage Commission shall be contacted within twenty-four (24) hours. The Native American Heritage Commission shall immediately identify the "most likely descendant(s)" and notify them of the discovery. The "most likely descendant(s)" shall make recommendations within forty-eight (48) hours, and engage in consultations with the landowner concerning the treatment of the remains, as provided in Public Resources Code Section 5097.98 and the Agreement described in CUL-3.	In response to this comment, Mitigation Measure CUL-7 was added to the Recirculated Draft EIR: *Page 3.4-23 of the Recirculated Draft EIR* **CUL-7:** If human remains are encountered, consistent with California Health and Safety Code Section 7050.5, DWR shall immediately halt work within 100 feet of the discovery and contact the Riverside County Coroner. No further disturbance shall occur within 100 feet of the discovery until the Riverside County Coroner has made the necessary findings as to origin of the remains. Further, consistent with California Public Resources Code Section 5097.98(b), human remains shall be left in place and free from disturbance until a final decision as to the treatment and disposition has been made. Any further project-related activities shall take into account the possibility of multiple burials. If the Riverside County Coroner determines the remains to be Native American, the Native American Heritage Commission shall be contacted within twenty-four (24) hours. The Native American Heritage Commission shall immediately identify the Most Likely Descendant(s) and notify them of the discovery. The Most Likely Descendant(s) shall make recommendations within forty-eight (48) hours of being granted access to the site, and engage in

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			consultations with the landowner concerning the treatment of the remains, as provided in Public Resources Code Section 5097.98.
10	N	**CUL-6:** The Project archaeologist shall prepare a final archaeological report within sixty (60) days of completion of the Project. The report shall follow ARMR Guidelines and Department of Water Resources requirements and shall include at a minimum: a discussion of the monitoring methods and techniques used; the results of the monitoring program, including any artifacts recovered; an inventory of any resources recovered; updated DPR forms for site(s) identified; final disposition of the resources; and any additional recommendations. A final copy shall be submitted to the Department of Water Resources, the Eastern Information Center (EIC), and the Pechanga Tribe.	In response to this comment, Mitigation Measure CUL-4 was added to the Recirculated Draft EIR: *Page 3.4-21 of the Recirculated Draft EIR* **CUL-4:** The qualified archaeologist shall prepare a final archaeological monitoring report within sixty (60) days of completion of the monitoring of ground disturbing activities related to the project. The report shall follow *Archaeological Resource Management Reports: Recommended Contents and Format* guidelines and DWR requirements and shall include at a minimum: a discussion of the monitoring methods and techniques used; the results of the monitoring program, including any artifacts recovered; an inventory of any resources recovered; California Department of Parks and Recreation (DPR) 523 forms for identified resources; notation of the final disposition of the resources; and any additional recommendations. A final copy shall be submitted to DWR, the Eastern Information Center (EIC), the Pechanga Tribe, and any other Native American group who requests a copy.
10	O	**CUL-7:** All cultural materials collected during the grading monitoring program and from any previous archaeological studies or excavations on the project site, excluding sacred items, burial goods and human remains which will be addressed in the agreement required in MM 1, shall be curated in the Pechanga Tribe's curation facility according to current professional repository standards. The collections and associated records shall be transferred, including title, to the Pechanga Tribe's curation facility which meets the standards set forth in 36 C.F.R. Part 79 for Federal repositories. All sacred sites, should they be encountered within the Project area, shall be avoided and preserved in perpetuity as the preferred mitigation, if feasible.	In response to this comment, Mitigation Measure CUL-5 was added to the Recirculated Draft EIR: *Page 3.4-21 of the Recirculated Draft EIR* **CUL-5:** All cultural materials collected during the monitoring program, and testing and/or data recovery of identified resources, excluding sacred items, burial goods and human remains the treatment of which would be determined by the Most Likely Descendant in coordination with the landowner (as prescribed in CUL-7 and in accordance with state laws), shall be curated at a facility that meets the curation standards set forth in 36 Code of Federal Regulations Part 79, as determined by DWR in consultation the qualified archaeologist and appropriate Native American representatives.
10	P	The Tribe reserves the right to fully participate in the environmental review process, as well as to provide further comment on the Project's impacts to cultural resources and potential mitigation for such impacts after received our	Comment noted. As noted in response to Comment 10A, the Pechanga Tribe has been added to the project's distribution list for further notification

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		requested documentation. The Pechanga Tribe looks forward to working together with the Department of Water Resources in protecting the invaluable Pechanga cultural resources found in the Project area. Please contact me at 951-770-8113 or at eozdil@pechanga-nsn.gov once you have had a chance to review these comments so that we might address any outstanding issues concerning the mitigation language. Thank you.	regarding notices, documents, and public meetings associated with the proposed project.
Letter 11: Oval Entertainment, LLC			
11	A	OVAL Entertainment (LLC) dba Perris Auto Speedway (PAS) has reviewed the California Department of Water Resources (DWR) Draft Environmental Impact Report (EIR) for the Perris Dam Emergency Release Facility (Proposed Project) and has concluded that the proposed project will negatively impact the operation of our racetrack. Construction of the project as outlined, will impact employees, users, and public spectators trying to enter or exit the facility. When you add the attendance for both private and public events, PAS has over 120,000 visitors per year. Any good racetrack promoter ranks the ingress and egress into their facility as the number one priority of a successful venue. Our facility is a destination facility and any negative impact to the access of the facility will have a corresponding negative impact to our race fans. Without race fans, there is no Racing! Specifically, any full or partial road closures of Lake Perris Drive or Fair Way Drive/Avalon Parkway within the three-year construction timeframe will impact the PAS for years to come. A perfect example is when Kentucky Speedway hosted their first NASCAR Sprint Cup race on July 9, 2011 and had traffic backed up for miles. After investing over $10 million dollars of improvements to their facility their attendance in 2012 was the worst of any Speedway Motorsports Incorporated owned tracks. Race fans like most sports fans do not tolerate poor traffic conditions. It will take years for SMI to rebuild their image at the Kentucky Speedway. The PAS cannot afford to go through this. This project could force the closure of one of America's premier racing facilities. The PAS has been a tenant of the 46th District Agricultural Association/Lake Perris Fairgrounds since 1995. OVAL's current contract (95-37-INT) expires in December of 2029 and expects to extend the existing contract for an additional 15 years. The PAS racing season runs annually from January to mid December. Historically, the PAS has produced up to 50 events per year. The majority of these events are on Saturday nights, however the PAS also produces multi-day events throughout the year. These multi-day events typically are at the beginning and end of the season. In addition, the PAS	This comment does not raise an issue of noncompliance under CEQA or address the adequacy of the Draft EIR. The Recirculated Draft EIR assesses impacts to traffic that will result as a result of the project beginning on page 3.14-11 and summarized on page 3.14-30. The assessment includes impacts to access to the Fairgrounds during planned events. See response to Comment 5B regarding impacts to Fairgrounds operations and Comment 9F for a discussion regarding access along Avalon Parkway (Fairway Drive).

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		provides race teams; tire manufactures (BF Goodrich, Hoosier and Goodyear), racecar developers (American Honda, Yamaha, Chevrolet and Toyota), racecar driving schools, and race clubs the opportunity to rent the racetrack for their private practice (Tune and Testing) sessions. These private practice sessions occur throughout the entire year. In 2016, the PAS had a record with over 100 private practices. The current trend indicates a significant increase over the previous year. In addition, the PAS has been a remote shoot location for television commercials and television programs. The facility is virtually available any day or night of the year. Therefore, the PAS requires access from Ramona Expressway and Fair Way Drive/Avalon Parkway for 365 days a year.	
11	B	According to the DWR's Draft EIR, the proposed project is estimated to take up to three years and impact both entrances to the Lake Perris Fairgrounds via Ramona Expressway, Lake Perris Drive, and Fair Way Drive/Avalon Parkway. Avalon Parkway turns into Fair Way Drive on the north side of Ramona Expressway that accesses the Lake Perris Fairgrounds. The impacts on ingress and egress at these roadways and both entrances into the track are devastating. **LAKE PERRIS DRIVE** Lake Perris Drive is the main ingress and egress for our Spectators, Vendors, Employees, Sponsors, Staff, VIP's, and Campers for our events. This Parking Lot opens up three hours prior to the Front Gate opening. The Campground opens up a minimum of one day prior to the event. The typical hours of operation for the Parking Lot is from 2:00 pm till 11:30 pm. The Campground closes at noon the day after the event. Lake Perris Drive is the ingress and egress for our concession and facility supply deliveries as well. These deliveries are from several organizations and occur during the weekdays from 8:00 am to 5:00 pm. The PAS suffered tremendously from the "Great Recession" which started in 2008. Attendance from 2009 through 2010 declined almost 50%. OVAL suffered significant operating losses during these years. Since 2011, the attendance has continued to rebound to the levels prior to 2009. Our goal is to continue to increase the total number of annual events back up to 50 and beyond as the economy continues to improve. Currently, 2016 has been one of the best financial years for OVAL. With the construction of this project estimated to start in 2018, momentum of our recovery will be derailed.	The Recirculated Draft EIR assesses impacts to traffic beginning on page 3.14-11 and ends on page 3.14-30. The assessment includes impacts to access to the Fairgrounds during planned events. The Recirculated Draft EIR concludes on page 3.14-27 that the project would result in significant unavoidable impacts to traffic. The traffic analysis was supported by a Traffic Technical Study, included as Appendix F. Mitigation Measure TRANS-1 was developed with input from the Traffic Technical Study to mitigate impacts to traffic through re-striping of turning lanes and modifying signalization to facilitate traffic. The Recirculated Draft EIR acknowledges that the significant impacts to traffic are unavoidable. DWR concludes that the need for the project to protect public safety overrides the temporary inconvenience to local traffic and businesses caused by construction activities. See response to Comment 9F.

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11	C	**FAIR WAY DRIVE/AVALON PARKWAY** Fair Way Drive (as identified as Avalon Parkway in the Draft EIR) is the Gate "A" entrance to the Lake Perris Fairgrounds. The PAS was designed in 1996 to utilize this gate for the infield pit entrance and pit parking lot. This entrance is where up to 150 racecar haulers plus up to an additional 600 cars per event enter the facility. The primary pit area is inside the racetrack with overflow pit parking in the pit parking lot. The back pit area has been designed to not only function as one main pit area, but also a pit area and a parking lot. All pit areas are restricted areas and must be managed accordingly. The Pit area opens for parking at 12:00 pm on event days and closes at 1:00 am on event days. However, some teams travel a long distance and are therefore allowed to spend the night and leave the facility by 12:00 pm on the day after the event. As the only access road to the infield pit area, any fully or temporary closure of Fair Way Drive will close the facility to all events and private practices This access road was designed specifically to be used by Race Haulers that can be as long as 75 feet. To simply say, the main entrance will be used as an alternate route only gets them on the property not in the infield. This entrance is also our designated emergency responders way of accessing the facility if their services are needed during an event.	The Recirculated Draft EIR in Section 3.14 evaluates potential impacts to traffic that would result from the construction of bridges at Evans Road, Lake Perris Drive, and Avalon Parkway (Fairway Drive), requiring either a partial closure or full closure of the roadways. The Avalon Parkway construction only includes a full closure scenario. However, the Recirculated Draft EIR included modifications to the Avalon Parkway (Fair Way Drive) closure analysis to allow for one lane of access during larger planned events, in coordination with the Fairgrounds (see discussion in pages 2-18 and 3.14-22 of the Recirculated Draft EIR). However, the Recirculated Draft EIR also concludes that even with the addition of the one lane of access during larger planned events, the Lake Perris Drive entrance would result in significant unavoidable impacts to traffic during construction of the Avalon Parkway culvert since additional traffic detours to the Lake Perris Drive entrance would contribute to the already congested level of service at that entrance during events. The traffic analysis was supported by a Traffic Technical Study, included as Appendix F. Mitigation Measure TRANS-1 was developed with input from the Traffic Technical Study to mitigate impacts to traffic through re-striping of turning lanes and modifying signalization to facilitate traffic. The Recirculated Draft EIR acknowledges that the significant impacts to traffic are unavoidable.
11	D	The full closure of the Fair Way Drive/Avalon Parkway will have a significant impact on the operation of the PAS. OVAL recommends, that the DWR construct the bridge similar to Option A Partial Closure at Lake Perris Drive with a minimum of one lane in and one lane out during construction. This would close some the ingress/egress lanes into the Fairgrounds at this intersection during phased construction of the bridge, while still allowing reduced two-way traffic access.	See response to Comment 11C.
11	E	With respect to our livelihood, PAS provides the following comments to the (DWR) Draft EIR for the Proposed Project. A. The Notice of Preparation (September 9, 2013) stated: "The EIR will assess impacts to local utilities and service systems". The Draft EIR failed to identify the local utilities that service the local business's including the Lake Perris Fairgrounds and the PAS. Furthermore, the Notice of Preparation stated: "The proposed project may also have temporary impacts to local utility distribution systems." The Draft EIR does not discuss the duration of the impacts that will occur during the construction phase. The Draft EIR states "The project could have significant impact if it would encounter buried utilities". The Mitigation Measure states: "During design and prior to	The Draft EIR describes on page 3.12-8 that known utilities impacted by the project would include "water mains and backflow devices, high voltage electricity lines, sanitation sewer lines, gas lines, irrigation system pipelines, lighting, electronic message center, and control fencing." The Draft EIR acknowledges that other utilities may exist that are not readily known, and includes Mitigation Measure UTIL-2 that requires DWR to conduct an underground utility search prior to construction to ensure all utilities are located prior to impact. Identifying underground utilities prior to excavation is standard practice conducted by contractors to avoid disruption of services as well as to ensure safety of the workers. As noted on page 3.12-8, DWR will coordinate with utility providers and customers prior to disruption of service to

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		construction, an underground utilities search will be conducted to compile available information on utility locations." Based on our knowledge of the area the following utilities will be impacted within the project that services the Lake Perris Fairgrounds and the PAS: 1) The water system for the Fairgrounds is fed by an underground 12-inch main line that enters the facility just west of Fair Way Drive/Avalon Parkway. The shut off valves and the backflow preventer is within the excavation area of the Proposed Project. 2) The high voltage electrical service for the Lake Perris Fairgrounds is fed above ground just west of Fair Way Drive/Avalon Parkway. There are four power poles within the excavation area of the Proposed Project. 3) The PAS electrical is fed below ground and ties into Edison's underground vault near the Sports Pavilion on the Fairgrounds. The feed for this underground vault is unknown. 4) The Telephone and Internet lines are distributed from a hub south of the Ramona Expressway and the Lake Perris Drive intersection. The lines extending to the Lake Perris Fairgrounds and the PAS are underground and cross through the excavation area of the Proposed Project. 5) The main gas lines that enter the Fairgrounds and the PAS are underground and their location is unknown. 6) The Fairgrounds sewer system is fed to an underground pumping station that is located just east of Lake Perris Drive. This pumping station is located within the excavation of the Proposed Project and will have to be located to a new location. All utilities are located within the Emergency Release Facility footprint. The conclusion in the EIR is a less than significant with mitigation measures. However, at this time the Draft EIR does not list or locate the impacted utilities. In Section 3.12.3 Impacts and Mitigation Measures the Draft EIR states: "The proposed project would have a significant impact if it would encounter buried utilities". It is clear they will encounter buried utilities during the excavation of the Emergency Release Facility. Therefore, OVAL would like the Department of Water Resources to guarantee that there will not be any service interruptions during setup and operational periods of the racetrack.	minimize temporary nuisance to customers, including tenants at the Fairgrounds. The Draft EIR concludes that impacts from disruption of service would be temporary and done in coordination with customers to minimize impacts.
11	F	B. Both entrances to the Fairgrounds will be impacted during the construction of the Emergency Release Facility as they construct bridges at both entrances. The Main entrance (Ramona Expressway and Lake Perris Drive)	The commenter is correct in stating that the proposed project's Traffic Technical Study and Draft EIR determined that the Option A driveway configuration will have significant impacts during the construction period. The

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		will be impacted for one (Option B) to two years (Option A) depending upon which option is chosen. The Draft EIR states "Option A will have significant and unavoidable impacts when special events are held at the Lake Perris Fairgrounds" which includes OVAL events. Option B will have less than significant impacts, however the perception of a temporary entrance road along with the ongoing construction will impact the attendance at the PAS. The Fair Way Drive/Avalon Parkway entrance for the Fairgrounds will be closed for approximately 12 months. This entrance is the only entrance used by Race Teams and Transporters to access the back parking lot and the infield pit area to the PAS. The traffic will have to be rerouted to the Main Entrance and a new access road will have to be established to access the back parking lot, pit booths and the infield pit area. This rerouting will significantly impact the Main Entrance with the closure of the Fair Way Drive/Avalon Parkway entrance. In addition, the closure of the Fair Way Drive/ Avalon Parkway entrance will impact the exiting of the facility after OVAL events as we currently open all exit routes when the event is over. Currently some events take over an hour to have all the spectator cars exit the facility. With only one exit the estimated timeframe will be as high as two hours to exit all the vehicles from the facility, which will further affect the spectator experience.	statement that Option B will have less significant impacts matches the determinations in the Traffic Technical Study and Draft EIR. Delays caused by spectator slowing could occur throughout the construction corridor, but the lack of substandard curves and approach lane configuration capacity reductions under Option B (as the construction-period configuration of the temporary roadway will allow for adequate vehicle progression/speeds for on-site traffic movement and will also allow for the same lane configuration at the approach to Ramona Expressway) should not cause undue delay in vehicle movements into and out of the site. The comments are noted regarding the use of Avalon Parkway (Fair Way Drive) for access to the back parking lot and infield pit area of the Speedway facility. See response to Comment 11C.
11	G	C. Upon reviewing the KOA Corporations Traffic Impact Analysis OVAL has the following comments: OPTION A – PARTIAL CLOSURE OF LAKE PERRIS DRIVE 1) In Section 2.2 Project Schedule the following is stated "Construction of the ERF is scheduled to begin in early 2018 or later. The construction of the two bridge structures could begin as early as 2018 and would be completed by no later than 2023." This timeline is inconsistent with the construction schedule in the Draft EIR.	Please see Table 2-1 of the Recirculated Draft EIR describing a 36-month schedule. The Traffic Impact Analysis assumes that the 36-month construction period would occur within the longer five-year period in order to capture impacts if the project experiences delays.
11	H	2) In Section 3.4 Significant Traffic Impacts lists The Lake Perris Drive & Ramona Expressway is currently operating at a LOS F during the p.m. peak hour. Existing Intersection LOS – Section 1.5 states that "LOS F was used as the standard at Ramona Expressway intersection." The closure of Fair Way Drive/Avalon Parkway intersection for access to the Fairgrounds and the PAS will impact this highly congested intersection too much higher levels.	Table 3.14-5 of the Recirculated Draft EIR notes that based on recent traffic counts, the intersection of Lake Perris Drive and Ramona Expressway operates under a LOS A during AM and PM peak hours. However, in order to capture periods where events at the Fairgrounds create congested traffic, the Traffic Technical Study (Appendix F Table 5) adds traffic to this intersection to reflect a large Fairgrounds event. This was done to avoid underestimating traffic conditions that are frequently, but not routinely experienced at these intersections. In response to this comment, the significance conclusions of impacts related to construction of the box culvert at Avalon Parkway was modified to

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			significant and unavoidable at the Lake Perris Drive Fairgrounds entrance on page 3.14-22. See also response to Comment 11C. *Page 3.14-22 of the Recirculated Draft EIR* **Avalon Parkway Box Culvert Construction** A box culvert would be constructed at Avalon Parkway north of Ramona Expressway. This intersection is solely used for entrance into the Lake Perris Fairgrounds. ~~During construction, t~~This ~~Fairgrounds~~ entrance would remain closed during construction (approximately 12 months), except during large events where one lane would be open for access as pre-arranged with the Fairgrounds ~~be closed for the duration of construction (approximately 12 months)~~. The Lake Perris Fairground's main entrance is located off Lake Perris Drive. During the construction of the Avalon Parkway entrance, the Fairground's main entrance would be open and able to accommodate the flow of traffic entering and exiting the Fairgrounds. However, d~~D~~uring larger planned events, traffic may be slightly worse than usual due to the closure of the Avalon Parkway entrance and would contribute to traffic on Lake Perris Drive, an already impacted roadway. DWR will work with the Fairgrounds to ensure the minimum impact feasible and will maintain one lane of access at Avalon Parkway during pre-arranged large events. Impacts from the construction of the Avalon Parkway box culvert would be temporary, requiring approximately 12 months. With implementation of the Traffic Management Plan, proper signage, ~~and~~ coordination with the Lake Perris Fairgrounds, and allowing one lane of access during pre-arranged large events, impacts of a ~~full~~ roadway closure at Avalon Parkway would be considered less than significant. However, due to the contribution of traffic being shifted toward the Lake Perris Drive/Ramona Expressway intersection during larger events, even with one lane of traffic open at Avalon Parkway, impacts to the Lake Perris Drive intersection would be considered significant and unavoidable during construction.
11	I	3) In Section 4.1 Project Trip Generation the additional total number of daily truck trips of 870 alone with the approximately 236 daily worker trips will compound the LOS "F" rated intersection and further increase the impact.	See response to Comment 11H. The daily truck trips and commuter trips would be spread out over the work day, including during peak hour traffic periods. The Recirculated Draft EIR notes on page 3.14-28 that the addition of project-related trips would not result in a significant increase in level of service for any intersection during normal traffic patterns. However, during

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			events at Fairgrounds, any additional traffic would combine with existing congestion resulting in a worsening of delays. The Recirculated Draft EIR concludes that since conditions are already LOS F during these periods, the additional trips caused by diverted traffic from the closed Avalon Parkway (Fair Way Drive) would add to the condition, resulting in a significant an unavoidable impact.
11	J	4) In Section 5.3 Lake Perris Drive Closure Construction Analysis although the results show at the intersection a PM. LOS F rating (>300), the p.m. period was conducted to simulate a period of high traffic congestion, using weekday counts as traffic counts for a major weekend event (like the PAS) or period of high recreational activity were not available." Furthermore, their conclusion states, "The lane modifications at the Lake Perris Drive/Ramona Expressway intersection would create a significant traffic impact. This impact would occur when events occur at the Perris Fairgrounds, or when major weekend activity occurs at the lake". There is no question this already highly congested intersection during construction will impede the ingress and egress to the PAS. The projected >300 Average Stop Delay is five time higher than the ?80 threshold of assigning a LOS factor of "F".	See response to Comment 11H. The weekday counts were applied to the analysis to represent worse case conditions since traffic levels are higher on weekdays than on weekends. Therefore, the analysis is conservative and uses generally higher traffic volumes for Ramona Expressway traffic, for the estimated weekend conditions. Traffic at the Lake Perris Drive approach was based on estimates of event egress volume during one peak hour. The quoted delay value of ">300" seconds is taken from the "existing plus-construction" scenario analyzed in Table 11 of the Traffic Technical Study (included as Appendix F of the Recirculated Draft EIR). LOS F conditions still apply, as this is the last range in the LOS scale, and has no maximum limit. The Recirculated Draft EIR concludes that construction activities would contribute to traffic delays at local intersections and in the local region during events at the Fairgrounds. However, these existing conditions are already LOS F at local intersections due to the events. The Recirculated Draft EIR concludes on page 3.14-27 that the proposed project would add to the already significantly congested intersections during events, resulting in a significant and unavoidable impact of the project for Option A. However, for Option B, a bypass would be constructed at Lake Perris Drive to accommodate existing lanes, minimizing the project's contribution to event-related congestion and resulting in a less than significant impact to event-related congestion.
11	K	5) In Appendix C Existing Plus-Project Construction Levels of Service Worksheets (Partial Closure) the Lake Perris Drive-P.M Peak Hour Intersection Summary indicates a delay of 1,222.4 with a LOS F rating. Please clarify or explain why 1,222.4 is not used as the PM Delay in Table 11 "Lake Perris Drive Work Area Impacts-Existing plus-Project Condition."	The value provided for delay at the Lake Perris Drive/Ramona Expressway intersection in Appendix C of the Traffic Technical Study (Appendix F of the Recirculated Draft EIR) for analyzed intersection ID #13 is caused by the large egress of traffic during an event at the Speedway site. At high levels of congestion, the LOS methodology provides exponentially higher delay values for linear increases in volumes. The indicated values in the analysis summary tables are capped at 300 seconds of delay to avoid showing large delays per vehicle that may not be realistic. The text preceding Table 11 of the Traffic Technical Study, indicates the following: "For high delay values, the difference in the right-most column is not shown, as the delay cannot be quantified." Using the higher calculated value would not change the technical study conclusions and the identified significant impact would remain.

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			It should be noted that the values described are for impacts related to the partial closure option (Option A). The partial closure option does create elevated LOS values. Therefore, the EIR also analyzes the full closure option (Option B) which alleviates several of these impacts by redirecting traffic through a pre-designated detour route. The Recirculate draft EIR includes mitigation measures designed to reduce some of the impacts during construction, but the overall impact to traffic is significant and unavoidable.
11	L	6) In Section 6.3 Future Intersection Levels of Service the PM LOS rating is an "F" (152.5) without construction conditions.	See response to Comment 11H. The quoted delay is in Table 12 of the Traffic Technical Study, which summarizes future without project construction conditions, but with a simulated event. This is an extrapolated condition based on the traffic data compiled for the Traffic Technical Study. This and eight other study intersections were identified to be operating at poor LOS values of E or F.
11	M	7) In Section 7.4 Lake Perris Drive Closure Construction Analysis the PM LOS rating is an "F" (177.5) and once again the PM analysis was conducted to simulate a period of high traffic congestion, using weekday counts which is not accurate. Again the following statement is made, "The lane modifications at the Lake Perris Drive/Ramona Expressway intersection would create a significant traffic impact. This impact would occur when events occur at the Perris Fairgrounds, or when major weekend activity occurs at the Lake."	See response to Comment 11J. The use of weekday p.m. peak hour traffic counts for Ramona Expressway for the weekend analysis is conservative, as weekday volumes during the commute periods are higher than the peaks of the weekend. The identification of the significant impact occurred due to LOS F conditions at the Lake Perris Drive/Ramona Expressway intersection, with or without construction.
11	N	8) In Section 9. Conclusions and Recommended Measures in the near future without project conditions, nine of the sixteen study intersections would operate at LOS E or F during the AM or PM peak hours. With Project construction with Option A (partial closure) conditions, nine of the sixteen study intersections would operate at LOS F during the AM or PM peak hours and under Option B (full closure) conditions, eleven of the sixteen study intersections would operate at LOS F during the AM or PM peak hours. This severe impact to the access of the roadway will in turn result in significant negative impacts to our operation as a result of race teams and fans avoiding our facility.	See response to Comment 11H. The Recirculated Draft EIR analyzed two options (partial and full closure). The partial closure option (Option A) would result in a longer construction duration with fewer impacts as opposed to the full closure option (Option B) which would result in a shorter construction duration with greater impacts to traffic. The comment notes that the bridge construction for both options would result in impacts to the intersection and to the local region. Tables 3.14-12 and 3.14-13 of the Recirculated Draft EIR identify the intersections that would be significantly affected by either Option A or Option B. The Recirculated Draft EIR concludes that the full closure options would impact the local region as demonstrated by the elevated LOS values at the analyzed intersections along the detour route. The Recirculated Draft EIR includes mitigation measures designed to assist in the reduction of potential impacts at these intersections. However, the Recirculated Draft EIR concludes that even with the implementation of the proposed mitigation measures impacts at these intersections would remain significant and unavoidable.

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11	O	9) Why wasn't there any traffic data and analysis presented on the Full Closure of the Fair Way Drive/Avalon Parkway intersection? It seems there is no consideration for the Fairgrounds and the PAS on the Closure of the Fair Way Drive/ Avalon Parkway intersection even though there was a 72-hour directional volume court compiled on September 5-7, 2013. This intersection and entrance is a major part of the ingress and egress for the Lake Perris Fairgrounds and the PAS.	See response to Comment 11C. The Recirculated Draft EIR notes on page 3.14-27 that the traffic normally accommodated by the Avalon Parkway / Fair Way Drive intersection may be detoured to the Lake Perris Drive intersection. The referenced 72-hour volume count at the Avalon Parkway (Fair Way Drive) location was part of average daily traffic (ADT) roadway counts conducted at Ramona Expressway and other locations. These counts were conducted via the use of machine counters with tubes laid across the roadway. The referenced count was not an intersection count and cannot be analyzed for the Avalon Parkway (Fair Way Drive) intersection.
11	P	**OPTION B – FULL CLOSURE WITH A TEMPORARY DETOUR ROAD** 1) In Section 5.2 Option B (Full Closure at Evans Road) Construction Analysis will increase the already heavily traveled Ramona Expressway in both directions.	The Draft EIR summarizes impacts from Option B to traffic at intersections on Ramona Expressway in Table 3.14-13 of the Recirculated Draft EIR. The Recirculated Draft EIR concludes on page 3.14-27 that impacts to traffic at several intersections including several on Ramona Expressway would be significant and unavoidable. Mitigation Measure TRANS-1 requires restriping at affected intersections that would minimize but not eliminate the significant impact.
11	Q	2) Lake Perris Drive & Ramona Expressway under existing PM conditions is already rated at delay factor of 119.2 and has a LOS rating of "F".	See response to Comment 11H. The quoted delay and LOS value for existing PM conditions at the Lake Perris Drive intersection are included in Table 5, page 17 of the Traffic Technical Study included in Appendix F of the Recirculated Draft EIR. As noted in the text on the same page, the traffic volumes at this intersection are increased from actual counts in order to reflect traffic from a large Fairgrounds event. This was done to avoid underestimating traffic conditions that are frequently, but not routinely experienced at these intersections. The proposed project would add an additional 33.3 second delay to the 119.2 seconds currently experienced, totaling 152.5, as shown on Table 3.14-11 in the Draft EIR. Since the 119.2 seconds of delay are already considered to be LOS F, the additional traffic resulting from the project would increase an already significantly impacted intersection.
11	R	3) Lake Perris Drive & Ramona Expressway in 2023 with no construction PM conditions is forecasted to have a delay factor of 152.5 and has a LOS rating of "F". That is a change in delay value of 33.3. What does this mean in additional time delay?	See response to Comment 11Q. Increases in the values between LOS tables, or within the impact tables, represent increased in delay per vehicle at the analyzed intersections. This translates to additional wait time per vehicle, in seconds.
11	S	4) There is no data supporting the closing of the Fair Way Drive/Avalon Parkway plus the added truck and employee traffic on the Lake Perris Drive and Ramona Expressway intersection during the	See response to Comment 11H. The daily truck trips and commuter trips would be spread out over the work day, including during peak hour traffic periods. The Draft EIR notes on page 3.14-28 that the addition of project-

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		construction of the bridge at Fair Way Drive/Avalon Parkway. Clearly there will be an impact.	related trips would not result in a significant increase in level of service for any intersection during normal traffic patterns. However, during events at the Fairgrounds, any additional traffic would combine with existing congestion resulting in a worsening of delays. The Draft Recirculated Draft EIR concludes on page 3.14-27 that the partial closure of the Lake Perris Drive intersection (Option A) would add a significant delay to the already congested event traffic. The Draft EIR also concludes on page 3.14-27 that the full closure of the roadway under Option B would be considered a less than significant impact since a bypass would be constructed as shown on Figure 3.14-5. The LOS F conditions at Lake Perris Drive created by special events at the Fairgrounds would be made worse during the closure of Avalon Parkway (Fair Way Drive) intersection. The Recirculated Draft EIR concludes that since conditions are already LOS F during these periods, any additional trips caused by diverted traffic from the closed Avalon Parkway (Fair Way Drive) would contribute to the unacceptable LOS. Therefore, the project's impact would be significant and unavoidable.
11	T	5) The Statement that "The temporary road would maintain the full current capacity of Lake Perris Drive, with NO change in traffic conditions and would maintain full access to the Lake Perris SRA and Lake Perris Fairgrounds" is false. The design of the temporary road has a curve to it, which will impact traffic and the "Lookie Lou" factor going through the construction site will be significant!	Figure 3.14-5 illustrates the proposed bypass at Lake Perris Drive to accommodate a full closure Option A. The Recirculated Draft EIR concludes on page 3.14-26 that the addition of the bypass would ensure that impacts to traffic would be less than significant. The Draft EIR does not suggest that the bypass would result in no impact at all. Since this segment of roadway accommodates turns from Ramona Expressway exclusively, the curve in the proposed bypass would not slow down traffic since traffic would already be slow to account for requisite turns at the intersection.
11	U	6) After an event the Fair Way Drive/Avalon Parkway intersection is used to alleviate the existing traffic after an event. With only one lane heading west and east on Ramona Expressway in the temporary detour entrance, the PAS and the Lake Perris Fairgrounds will be losing 50% of the exit capacity with the closure of the Fair Way Drive/Avalon Parkway exit. This reduction in capacity will have a significant impact on the Pas and Fairgrounds.	The Recirculated Draft EIR concludes on page 3.14-26 that under the partial closure Option A of Lake Perris Drive, impacts would be significant and unavoidable as suggested in the comment.
11	V	7) At the end of Volume 3 under Traffic Volumes on Local Area Roadways there is a 72 Hour Directional Volume Count on Ramona Expressway E and Avalon Parkway. It appears they did this count on the south side of the intersection that will not be impacted by the construction on the north side of the intersection. There appears to be no data on the North Side of Avalon Parkway, which is actually Fair Way Drive and the entrance and exit that will be closed during construction.	See response to Comment 11O, regarding roadway counts on Ramona Expressway. The referenced traffic counts were not intersection counts, but only average daily traffic counts on Ramona Expressway at this location. See response to Comments 11D and 11F**.**

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11	W	8) In the same Section there is a Traffic Volume on Gate "B" off of Lake Perris Drive, which is the Main Entrance to the PAS and the Fairgrounds. This was done from Thursday-Saturday on September 5th – 7th, 2013. These volumes are not even close to current conditions in 2016. In 2013 the peak volume on September 7, 2013 (The PAS was having a "Night of Destruction" event that night) was 624 at 6:00 pm. If you total the count from 4:00 pm to 7:30 pm the total volume was 1,153. On September 3, 2016 the PAS had the same show as 2013, however, the volume of cars that were parked for that event was 4,127 roughly 3.5 times higher than 2013. With Avalon Parkway opened as an exit, it still took almost two hours to exit all the traffic after the event was over. Without Avalon Parkway it will take over 2 hours, which is unacceptable to our race fans.	See response to Comment 11O, regarding the 72-hour count conducted on Ramona Expressway and Lake Perris Drive. The Recirculated Draft EIR acknowledges that special events can bring large traffic volumes during egress and ingress, resulting in LOS F ratings for the intersection of Lake Perris Drive and Ramona Expressway. The Technical Study assesses the peak hour exiting vehicle load at the end of a special event, but it is understood that the event peak egress period may extend into a second hour of lesser intensity. This is typical of stadium, racetrack, concert, and other special event facilities. The traffic analysis focuses on the peak periods of roadway traffic. Although it is acknowledged that the racetrack has a growing business that will increase congestion further, this worsening of an already LOS F condition would not change the traffic impact conclusions. The Recirculated Draft EIR concludes on page 3.14-27, that impacts to Lake Perris Drive would be considered significant and unavoidable under Option A, but less than significant under Option B due to the bypass shown in Figure 3.14-5.
11	X	D. The weekend traffic volume at the Lake Perris Drive and Ramona Expressway in the Draft EIR shows a Peak-Hour volume of 714. OVAL's volume of parked vehicles can be as high 4,127 not including other events that are occurring on the Fairgrounds at the same time. These vehicles enter the facility in less than a two-hour period.	The Traffic Technical Study included as Appendix F of the Recirculated Draft EIR identifies the intensity of outbound traffic at the lake Perris Drive/Ramona Expressway intersection during special events to be 1,689 outbound right-turn movements and 1,125 outbound left-turn movements per hour, as illustrated for study intersection #13 on Figure 22 of the Traffic Technical Study. The Recirculated Draft EIR includes existing traffic counts during days when no events are occurring in Table 3.14-1. As noted in the table, the traffic counts recorded 714 PM peak traffic trips one weekend evening in 2013.
11	Y	E. The designated haul routes for the excavation of the Emergency Release Facility west of Lake Perris Drive shows the traffic utilizing Lake Perris Drive, which will impact the ingress and egress of the facility.	The Recirculated Draft EIR concludes on page 3.14-27 that the addition of the 870 daily construction trips would not significantly add to congestion in the project area. However, during special events at the Fairgrounds that create unacceptable delays, the construction traffic would add to these already significant conditions. The Recirculated Draft EIR notes on page 3.14-29 that the use of the haul route along Lake Perris Drive would be limited, whenever feasible, during high levels of ingress/egress due to events at the Fairgrounds. Nonetheless, the Recirculated Draft EIR concludes on page 3.14-27 that the project would result in significant and unavoidable impacts to traffic during construction.
11	Z	F. There are five proposed Alternatives all of which would result (except for Alternative 5 – No Project) in "Significant and unavoidable traffic and circulation impacts with mitigation incorporated." So no matter what the project turns out to be, the Lake Perris Fairgrounds and the PAS will be	The proposed project is a public safety project being implemented to reduce the risk to public safety and property resulting from the execution of an emergency operation to drawdown Lake Perris. The Recirculated Draft EIR evaluates project alternatives in Section 6. However, as described on page 6-

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		significantly impacted.	18 of the Recirculated Draft EIR, none of the proposed alternatives would avoid the significant impacts to traffic.
11	AA	G. When the Proposed Project impacts the attendance at OVAL's events the lower attendance will ultimately impact Sponsorship Revenue. The number and size of sponsorships are dependent upon the volume of product sold or the total attendance (impressions) for OVAL's events. Sponsorship Revenue is a vital component for the success of the Speedway.	This comment does not describe an inadequacy of the Draft EIR. No further response is required.
11	BB	H. In Section 6.1.3 Review of Significant Environmental Impacts it states the following; "Implementation of the proposed project would result in the following significant and unavoidable impacts during the construction period to aesthetics, noise and transportation and traffic: (1) construction impacts would degrade the existing visual character of the project site and its surroundings; (2) noise impacts would increase ambient noise levels: and (3) daily traffic flows on local roadways would be temporarily disrupted during the bridge and box culvert construction". Further information regarding the impacts to the Lake Perris Fairgrounds and the PAS is needed.	Section 6.1.3 summarizes the significant environmental impacts evaluated in Chapter 3. The purpose of this section is to remind the reader of the EIR's conclusions. For further detail on the issues, please refer to Chapter 3.
11	CC	I. In Chapter 4 Cumulative Impacts, Transportation and Traffic states the following; "As described in Chapter 3, the proposed project would result in short-term increases in vehicle trips, reduced access to roadways, increased potential for traffic safety conflicts, and increased wear and tear on designated haul routes. Although some of the project impacts would be reduced to less than significant with proposed mitigation measures, the overall construction activities and road closures would cause significant and unavoidable impacts during construction. Thus, the project could further contribute to cumulative traffic and circulation impacts when considered in combination with projects listed in Table 4-1. "This statement alone raises red flags on the ingress and egress into the PAS.	The Recirculated Draft EIR provides a summary of traffic impacts on page 3.14-26. On page 4-11 the Draft EIR describes how these project impacts would contribute to the cumulative traffic condition in the region, concluding on page 4-12 that cumulative impacts would be significant. As noted on page 3.14-12 of the Recirculated Draft EIR, DWR will require the contractor to prepare a Traffic Management Plan to ensure that access to the Fairgrounds and PAS are maintained at all times either through the Avalon Parkway or Lake Perris Drive entrance. If needed, clearly marked detours routes will be posted for traffic management and to ensure to potential Fairgrounds patrons that facilities are open for business.
11	DD	J. Historically we release our upcoming yearly event schedule no later than October 31st so that the race teams; race fans and sponsors can plan accordingly. Based on construction scheduled to start in 2018 and the unknown of how this is going to impact the PAS, it will be extremely difficult to develop a schedule of events. This project will disrupt the planning and operation of the Speedway going forward for all the reasons stated above. This project will impact the amount of events we can produce which will in turn will impact, Ticket Sales, Pit Gate Sales, Membership Sales, Entry Fee Sales, Concession Sales, Souvenir Sales, Sponsorship Sales and Truck Rental Sales. All of these factors affect the long-term viability and future of	The Recirculated Draft EIR recognizes that the project would impact traffic patterns during construction. DWR would prepare a Traffic Management Plan to minimize impacts to traffic including egress and ingress at the Fairgrounds.

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		PAS.	
11	EE	**ALTERNATIVES** 1. Out of the four alternatives for the construction of the channel in the Fairgrounds Segment, OVAL recommends Alternative 4 – Fully Covered Channel option to be constructed instead of the proposed 320 wide-open channel. The impacted area for construction will be much less than the proposed project. The total amount of excavated material will be significant less. The project timeline should be shorter than proposed. If designed properly, there should be no need to construct the bridges at both entrances to the Fairgrounds. Once this alternative is complete the Fairgrounds would return to pre-project conditions and existing parking availability at the Lake Perris Fairgrounds and the PAS would not be permanently impacted.	As summarized in the revised Table 6-2 of the Draft EIR, Alternative 4 would have similar significant and unavoidable impacts as the proposed project. However, impacts to air quality and traffic would be worsened due to the additional transport of material required to construct the fully covered channel. Alternative 4 would not avoid significant impacts of the project and would increase impacts compared to the proposed project and Alternative 2.
11	FF	2. OVAL's second choice for the Fairgrounds Segment as presented in the Alternatives Section of the Draft EIR is Alternative 2 – Concrete-Lined Channel. The impacted area for construction will be much less than the proposed project. The total amount of excavated material will be significantly less. The span of the bridges at the entrances to the Fairgrounds would be 75% shorter than the proposed project. The land adjacent to Ramona Expressway could be fenced and landscaped to minimize the appearance of the channel. This alternative would minimize the loss of area to be used as parking for the Fairgrounds and PAS events.	As summarized in the revised Table 6-2, Alternative 2 Concrete-Lined Channel would result in similar impacts compared to the proposed project.
11	GG	3. The proposed Fairgrounds Segments that claims to allow for dual function is a recipe for disaster! Who would be liable, if and when this area was used for parking and foot traffic during an event and a significant earthquake occurred and there was a mandatory release into the channel? In addition, parking on a 10:1 slope is not advisable for the public. Event Parking planners and operators know through experience the difficulties associated with general public parking on flat terrain. Parking on sloped terrain will compound this complexity further increasing the time for ingress and egress as well as significantly increasing the risk of personal and property injury of both drivers and pedestrians.	The Recirculated Draft EIR identifies the Dual-use Alternative as a means of reducing impacts to parking at the Fairgrounds. The likelihood of a release occurring during a large Fairgrounds event is extremely remote. The Recirculated Draft EIR concludes that the alternative would not significantly increase risk to public safety. DWR will continue coordination with the Fairgrounds to discuss the channel options through the Fairgrounds Segment (as presented in the Recirculated Draft EIR).
11	HH	4. All of these alternatives, except for Alternative 2: Fairgrounds Segment – Concrete Lined Channel, are proposing excavated	The Draft EIR describes groundwater in the area on page 3.9-3. The groundwater study prepared for the Perris Dam Remediation Project noted

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		depths are deep as 25 feet. The Fairgrounds has a well (not in service) on the property and the groundwater is currently at 12 feet. Has the depth of the groundwater been determined and the impact of the proposed project intersecting the water table been assessed including dewatering issues and impacts to groundwater quality? Does DWR anticipate this to be an issue during construction? OVAL appreciates the EIR process and hopes that these comments show the extreme financial impact to the PAS. If you have questions please do not hesitate to contact us. We look forward to your timely reply to our questions.	that depth to groundwater below the dam was decreased due to the seepage from the dam. The Draft EIR concludes on page 3.9-11 that depth to groundwater in the project vicinity would be well below the excavation depths.
Letter 12: Family A Fair, Inc.			
12	A	Family A Fair Inc. is the current Master Concessionaire for the Southern California Fair facility located at 18700 Lake Perris Dr. Perris, CA. We have been committed and honored to conduct business on this property since 1995. We are the food and beverage operators for all events that take place on this property, holding service contracts with promoters such as Don Kazarian, who operates the Perris Auto Speedway. The events on this property produce over 50 percent of our annual gross revenue. We employ 8 full-time employees and 50 part-time. We project that over half of our employees may lose their jobs if this construction moves forward. After reviewing the California Department of Water Resources Draft Environmental Impact Report for the Perris Dam Emergency Release Facility, we have concluded that the proposed project will incur an extreme financial burden on our company. With all the road closures specified it will no doubt affect the attendance of all events on this property influencing the investing promoters in a negative manner, as it trickles down to our department, who services their customers. With all due respect, Family A Fair Inc. ask that alternative operations would be considered such as the suggestions from Oval Entertainment by (Don Kazarian), of a Fully Covered Channel. Thank you for informing our community of this proposed project. We understand the importance of this operation and hope that all considerations are encountered.	This comment does not describe an inadequacy of the Draft EIR. No further response is required. See response to Comments 11A- 11GG for responses to the Oval Entertainment letter.
Letter 13: Rutan & Tucker, LLP			
13	A	Thank you for the opportunity to comment on the draft Environmental Impact Report ("DEIR") regarding the Perris Dam Emergency Release Facility	The comment does not specify how commenter feels DWR failed to include information or meet CEQA's requirements. More specificity is provided in

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		("Project") prepared for the Department of Water Resources ("DWR"). We submit these comments on behalf of Mission Pacific Land Company, which owns land directly adjacent to the Western Segment of the Project. Attached hereto is a Technical Memorandum evaluating the proposed Project by Albert A. Webb Associates, a civil engineering and planning services firm that has served both public and private sector clients throughout Inland Southern California since 1945, with offices in Riverside, Palm Desert, and Murrieta. Webb Associates' expertise includes project development, planning and design, construction management, and ongoing maintenance and operation for drainage infrastructure, floodplain management, and stormwater management projects. A Statement of Qualifications for Webb Associates is also attached. Before it approves a project that may have significant impacts on the environment, a public agency must consider an environmental impact report. An EIR is an informational document that must (i) provide public agencies and the public with **detailed information** about a project and the effects the project is likely to have on the environment; (ii) list ways in which the significant effects of the project might be mitigated; and (iii) identify alternatives to the project. (Pub. Res. Code Section 21002, 21002.1(a), 21061, 21100, 21150; 14 Cal. Code Regs. Section 15362; *Vineyard Area Citizens for Responsible Growth v. City of Rancho Cordova* (2007) 40 Cal. 4th 412.) Enough details must be provided so as to enable the public and the agenices that will consider the project to have the information necessary to weigh competing policies and interests. (*See Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal. 3d 553, 564, 576; *In re Bay-Delta Programmatic Environmental Impact Report Coordinated Proceedings* (2008) 43 Cal 4th 1143, 1162.) The project description must include an accurate, stable, and consistent description of the proposed project, with sufficient specific information about the project to allow a complete evaluation and review of its environmental impacts. (14 Cal. Code Regs Section 15124.) Moreover, an EIR must identify and describe the project's significant environmental effects, including direct, indirect, and long-term effects. (Pub. Res. Code Section 21100(b)(1); 14 Cal. Code Regs Section 15126(a).) Here, as reflected in Webb Associates' Technical Memorandum, the DEIR is deficient in that it fails to include vital information, and fails to meet the requirements of Public Resources Code sections 21001, 21002.1, 21061,	commenter's following comments and DWR responds to those comments specifically below.

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		21100, and 21150, as well as 14 California Code of Regulations sections 15124, 15126.2, and 15362. For example:	
13	B	**Channel Design** 1. The design work for the proposed weir structure is missing from the documentation. Based on the limited length of this structure, it does not appear that the proposed levees are high enough to contain the peak discharge of 3,800 cfs and to allow for flow over the top of weir. As the DEIR assumes zero freeboard in the levee channel system, additional analysis is required for the design of the channel system.	The Recirculated Draft EIR describes the proposed project in Chapter 2, including the location and preliminary design of the proposed levees and weirs. Preliminary designs were prepared using standard surface water modeling tools. DWR will prepare detailed designs of the emergency release facility should DWR approve the proposed project. The preliminary designs prepared by DWR Division of Engineering summarized in Chapter 2, provide the appropriate levee heights and channel depths to convey 3,800 cfs to the Perris Valley Channel, while minimizing flooding adjacent to the facility and downstream. The primary objective of the project is to minimize flooding impacts associated with an emergency drawdown of Lake Perris. The final designs to be prepared by DWR will ensure that flooding is minimized and compatible with RCFCWCD stormwater flood protection standards. The potential for flooding is explained in Impacts 3.9-4 and 3.9-11 of the Draft EIR.
13	C	2. The Project proposes to use a levee system along both sides of the channel. Not only will the toe of the slope encroach into property owned by Mission Pacific Land Company, but the extent of the encroachment cannot be fully determined until a slope stability analysis and a levee height analysis are prepared.	The Recirculated Draft EIR acknowledges on page 2-13 that the Western Segment would be constructed within DWRs existing right-of-way. A slope stability analysis will be conducted to determine the necessary width of the embankment. Should final designs determine that the toe of the slope would encroach onto adjacent private property, DWR would either negotiate an easement with the property owner or construct a retaining wall to avoid the encroachment.
13	D	3. The area between Evans Road and the Perris Valley Storm Drain ("PVSD") is proposed to be a retention basin for the PVSD. Since the channel proposes a levee along this reach, the slope stability analysis must address this condition to ensure the basin is not impacted due to slope failure.	The Recirculated Draft EIR describes the proposed project in Chapter 2. The preliminary project designs take into consideration the local soil properties. As part of the final design for the proposed project, DWR will conduct a detailed slope stability analysis to determine the necessary slope and width of the embankment to avoid slope failure. Standard design procedures require that DWR prepare final designs of the emergency release facility to accommodate local soil conditions to ensure that system failure is avoided. Compliance with standard engineering practices will ensure effective designs.
13	E	4. The DEIR analysis assumes the PVSD would be empty at the time of the emergency release. Therefore, the DEIR fails to evaluate whether the weir structure would operate properly, or whether there would be additional flooding and overtopping of the levee, if the PVSD is not empty at the time of the emergency release. This would impact not only Mission Pacific Land Company's property, but the Ramona Expressway, as well.	As stated on page 3.9-15 of the Draft EIR, an Emergency Operations and Maintenance Manual will be prepared and adhered to during an emergency release, whereby flows would be modeled and controlled, where feasible, to avoid the overtopping of downstream sections of the Perris Valley Channel at the time of an emergency release. The hydrologic models prepared by DWR for the preliminary designs evaluate an emergency drawdown event occurring during a dry period. Once water is released to the Perris Valley Channel, the channel becomes full, resulting in the need to design the

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			emergency release facility to accommodate the flow with a full Perris Valley Channel. The emergency release facility would be designed to minimize overtopping of the levees. However, the Draft EIR concludes on page 3.9-15 that some areas not currently within the modeled inundation zone could be included within the zone due to the new facility. Figure 3.9-3 provides an estimated change of the potential inundation zone. The Draft EIR concludes on page 3.9-16 that the proposed project would substantially reduce flooding potential associated with the unlikely event of an emergency drawdown compared with the existing condition.
13	F	5. Because the channel intersects the PVSD at a 90 angle, it is uncertain that the flow will stay within the PVSD or escape the PVSD on the opposite side of the channel and flood westerly, based on the limited width of the PVSD and the velocity of the emergency release flow. Even if it is shown that the flow would stay within the confines of the PVSD, additional hydraulic analysis is necessary to analyze any hydraulic effect on the weir structure.	The Recirculated Draft EIR describes the weir structure connecting the emergency release facility with the Perris Valley Channel on page 2-13. Construction methods of the weir are described on page 2-19. The Recirculated Draft EIR acknowledges that velocity dissipation and scour protection would be required to avoid erosion. However, the Draft EIR concludes on page 3.9-15 that some areas not currently within the modeled inundation zone could be included within the zone due to the new facility. Figure 3.9-3 provides an estimated change of the potential inundation zone. The Draft EIR concludes on page 3.9-16 that the proposed project would substantially reduce flooding potential associated with the very unlikely event of an emergency drawdown compared with the existing condition. The proposed project is currently under preliminary design. A hydraulic analysis will be performed prior to the final design phase of the proposed project.
13	G	6. According to Riverside County Flood Control and Water Conservation District's Master Drainage Plan for Perris Valley, the proposed channel is along the same alignment as the regional flood control channel, Line U. The DEIR must address whether the Line U will be incorporated into the proposed DWR channel, and whether any inconsistencies exist between the Project and the Plan. (14 Cal. Code Regs. Section 15125(d).)	See response to Comment 2C.
13	H	**Bridge Design** 7. The width assumed for the bridge at Evans Road is inconsistent with the ultimate intersection geometry for Evans Road. The bridge width will need to be increased from 104' to approximately 120' wide.	The Recirculated Draft EIR describes the objectives and preliminary designs for the bridges across Lake Perris Drive and Evans Road on pages 2-13 and 2-17. The width of the bridges would be designed to accommodate existing roadway capacity. The project is not responsible for increasing the capacity of the roadways or intersections.
13	I	8. Because the channel is proposed as a levee system and the Evans Road bridge cannot touch the water surface, the bridge will need to be elevated over the current Evans Road elevation, which will	The Recirculated Draft EIR describes the objectives and preliminary designs for the bridges across Lake Perris Drive and Evans Road on pages 2-13 and 2-17. Figures 3.14-2, 3.14-3, and 3.14-4 illustrate the project impact areas.

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		require significant reconstruction of the intersection of Evans Road and Ramona Expressway. It will likely also require reconstruction of Evans Road along the frontage of Mission Pacific Land Company's property. None of the potential impacts of such reconstruction has been evaluated. Because the design work for this reconstruction is not provided, the significance of the potential impacts for this work cannot be properly identified and mitigated.	As shown in the figures, construction of the bridges would not require any construction activities or permanent changes to the Ramona Expressway intersections. The intersections would not require "reconstruction." Elevations of the bridges will be sufficient to accommodate design flows while avoiding construction within the intersections. Generally, state agencies involved with the location or construction of facilities for the production, generation, storage, treatment, or transmission of water, are not subject to local land use regulations. (See, e.g., *Hall v. Taft* (1956) 47 Cal. 2d 177, 183; *Town of Atherton v. Superior Court* (1958) 159 Cal.App.2d 417 and *Lawler v. City of Redding* (1992) 7 Cal.App. 4th 778, 784.) Therefore, although the proposed project strives for consistency with local general plans and other local land use regulations to the extent feasible given the project's objectives and purpose and need, the proposed project need not, as a legal matter, be consistent with local enactments. And any inconsistencies with local plans, by themselves, do not amount to significant environmental effects under CEQA. General plans are important because they serve as the basis for many local land use decisions. For instance, local zoning, subdivisions, capital improvements, development agreements, and numerous other land use actions can generally only be approved when they are consistent with the local jurisdiction's general plan. An action, program, or project is considered to be consistent with a general plan if, considering all its aspects, the action, program, or project will further the goals, objectives, and policies of the plan and not obstruct their attainment. Because many local actions must be consistent with general plans, general plans play an important role in local land use planning and local decision-making. State agencies, such as DWR, however, are generally immune from local regulation and land use controls based on the doctrine of sovereignty and therefore are not bound by city and county general plans or local ordinances. The concept of sovereignty involves a hierarchy of governmental authority that has the federal government at its apex, then moves downward to state government, and follows to local governments, such as cities and counties. The "supremacy" of the federal government in this scheme is set forth in the so-called "supremacy clause" of the United States Constitution (Article VI , Clause 2). State lead agencies, such as DWR, therefore, are not bound by local general plans, regulations, or ordinances because cities and counties lack legal authority over state agencies, as higher sovereigns. The state can waive its right to be free from local regulation, but only if it consents through statute or provision of the California Constitution. Because the state's immunity from local regulations is an extension of the concept of

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			sovereign immunity, the consent to waive immunity must be expressly stated. There has been no waiver of immunity or consent to local control for DWR operations generally or for the proposed project specifically. Furthermore, the state Legislature has made certain kinds of local and regional projects immune from local control, typically those that involve major infrastructure serving multiple communities. For example, although California Government Code Section 53091 generally requires each "local agency" to comply with "all applicable building ordinances and zoning ordinances of the county or city in which the territory of the local agency is situated," section 53096 creates an exception. Under the latter provision, such local enactments do not apply to the "location or construction of facilities for the production, generation, storage, treatment, or transmission of water." This exemption from local control applies to general plans as well as to zoning and building ordinances. Thus, like all state agency and federal agencies, local or regional agencies involved with the "location or construction of facilities for the production, generation, storage, treatment, or transmission of water," are also not bound by local general plans or other local regulations.
13	J	9. Any bridge must span the entire width of the channel, and a span of those lengths is infeasible without some sort of pier support. It also appears that the bridge deck elevation will need to be raised, which will require significant reconstruction of the street intersection and reconstruction of Evans Road along Mission Pacific Land Company's property. None of the potential impacts of such construction has been evaluated. Because the design work for this construction is not provided, the significance of the potential impacts for this work cannot be properly identified and mitigated.	See response to Comment 13I. The proposed project's potential environmental impacts have been discussed and analyzed within the Draft EIR and Recirculated Draft EIR; CEQA does not require final design drawings. DWR will properly design bridges with elevations sufficient to accommodate design flows while avoiding construction within the intersections.
13	K	10. The expansion of the Evans Road bridge width and the increased elevation of the bridge will have a significant impact on the existing utilities within the bridge footprint. The Southern California Edison transmission pole will need to be relocated outside of the bridge footprint which, due to spacing requirements, could lead to the relocation of additional SCE poles. The traffic signals and street lights also will need to be relocated as part of the intersection reconstruction. There are both potable and non-potable water lines that will require significant relocations to avoid the bridge abutments and piers. These relocations may also be affected by potential scour of the emergency release flows. While the sewer line appears to be significantly below the channel flowline, the design of the bridge abutments and piers may impact the existing facility and require that the facility either be encased in concrete or redesigned to	The Recirculated Draft EIR describes the objectives and preliminary designs for the bridges across Lake Perris Drive and Evans Road on pages 2-13 and 2-17. Figures 3.14-2, 3.14-3, and 3.14-4 illustrate the project impact areas. As shown in the figures, construction of the bridges would not require any construction activities or permanent changes to the Ramona Expressway intersections. The intersections would not require "reconstruction." The Draft EIR acknowledges the presence of underground utilities on page 3.12-8. Mitigation Measure UTIL-2 requires that an underground utility search be conducted. The Draft EIR states on page 3.12-8 that DWR in compliance with standard construction procedures would re-route utilities as necessary and minimize service disruptions in coordination with local service providers and affected customers.

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		incorporate a lift station to mitigate any potential impacts. Because the DEIR does not adequately analyze the impacts associated with the construction of the Evans Road bridge on the existing utilities in that area and the effect on the Ramona Expressway, the significance of the impacts cannot be properly identified and mitigated.	
13	L	General Comments 11. Although the DEIR purports to be a "project EIR", it bases the majority of the impact analysis on the ultimate build-out of the PVSD. As such, the DEIR can only be considered programmatic in nature. Program EIRs, however, are used for a series of actions – broad programmatic issues – at an early stage of the program planning. (14 Cal. Code Regs. Section 15168) Such analysis is inappropriate when considering specific projects, as here. By proceeding in this manner, the DEIR fails to properly identify and mitigate the significance of the Project's impacts.	The Recirculated Draft EIR evaluates a singular project that meets specific project objectives described on page 2-5. The proposed project does not include a series of actions for which a Program EIR would be appropriate. There are no future phases of the proposed project. As described within pages 3.9-14 through 3.9-16, the project would substantially reduce flooding potential below Perris Dam. Any future work to increase the capacity of the Perris Valley Channel below the emergency release facility connection would further reduce the risks of flooding. Further, as described on page 2-4 of the Recirculated Draft EIR, DWR will prepare an Emergency Operations and Maintenance Manual that outlines procedures to control the release flows up to 3,800 cfs, to minimize the possibility of inundating property adjacent to the Perris Valley Channel, until such time that RCFCWCD completes ultimate build-out of the Perris Valley Channel, which could then safely convey the full 3,800 cfs emergency release.
13	M	12. The DEIR fails to adequately address impacts associated with disruption of roads and utility services not only at Evans Road, but at the other locations along the Project route, as well.	See response to Comment 13K.
13	N	13. The DEIR provides insufficient information about the impacts associated with the existing PVSD.	The comment lacks specificity. However, as described within pages 3.9-14 through 3.9-16 of the Draft EIR, the project would substantially reduce flooding potential below Perris Dam. Apart from the discharge weir at the edge of the Perris Valley Channel, the project would not impact the Perris Valley Channel. DWR is not responsible for implementing the full build out of the Perris Valley Channel. Figure 3.9-3 illustrates the change to the inundation area that would result from implementation of the proposed project. The Draft EIR concludes on page 3.9-16 that implementation of the project would substantially reduce the risk of flooding compared to the existing condition.
13	O	14. The Project Description (Chapter 2) of the Western Segment is inconsistent with previous information provided by the State. This section will require the construction of levees west of Lake Perris Drive.	The comment lacks specificity and fails to explain what previous information is inconsistent with the project description of the Western Segment within the Draft EIR. Thus, it is difficult to provide a response to this comment.

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			DWR's project description complies with CEQA. It is worth noting that under CEQA, "[t]he description of the project … should not supply extensive detail beyond that needed for evaluation and review of the environmental impact[.]" (State CEQA Guidelines, § 15124.) "A general description of a project element can be provided earlier in the process than a detailed engineering plan and is more amenable to modification to reflect environmental concerns." (*Dry Creek Citizens Coalition v. County of Tulare* (1999) 70 Cal.App.4th 20, 28.) "The 'general description' requirement for the technical attributes of a project is consistent with the other CEQA mandates to make the EIR a user-friendly document." (*Ibid*.) "The EIR must achieve a balance between technical accuracy and public understanding." (*Ibid*.) The only mandatory components of a Project Description in an EIR are the following: (a) The precise location and boundaries of the proposed project shall be shown on a detailed map, preferably topographic. The location of the project shall also appear on a regional map. b) A statement of the objectives sought by the proposed project. A clearly written statement of objectives will help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and will aid the decision makers in preparing findings or a statement of overriding considerations, if necessary. The statement of objectives should include the underlying purpose of the project. (c) A general description of the project's technical, economic, and environmental characteristics, considering the principal engineering proposals if any and supporting public service facilities. (d) A statement briefly describing the intended uses of the EIR. (1) This statement shall include, to the extent that the information is known to the Lead Agency, (A) A list of the agencies that are expected to use the EIR in their decision making, and (B) A list of permits and other approvals required to implement the project. (C) A list of related environmental review and consultation requirements required by federal, state, or local laws, regulations, or policies. To the fullest extent possible, the lead agency should integrate CEQA review with these related environmental review and consultation requirements. The comment does not evidence any legal inadequacy in the Project Description. DWR will complete final project designs should the DWR Board approve the proposed project. The Recirculated Draft EIR acknowledges on page 2-13 that the Western Segment would be constructed within DWR's existing right-of-way. The middle of the channel will be excavated to form the majority of the channel shape. On each side of the channel there will be a short embankment to form the top of the channel and support the access roads. A slope stability analysis will be conducted to determine the necessary width of the embankment. Should final design determine that the toe of the slope would encroach onto adjacent private property, DWR would either negotiate

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			an easement with the property owner or construct a retaining wall to avoid the encroachment.
13	P	15. Figure 3.9-3 indicates that the new inundation area will expand beyond that of the existing inundation area. The potential impacts of that expansion have not been analyzed.	The Draft EIR analyzes the potential impacts from the modified inundation zone on pages 3.9-14 through 3.9-16. The Draft EIR identifies the land uses that currently exist in areas not previously within the inundation zone. The Draft EIR concludes that the potential for loss of life, injury or property damage in these areas is substantially less than the existing inundation zone. Furthermore, the likelihood of an emergency drawdown ever occurring is very low, significantly lower than a 100-year flood event. The Draft EIR concludes on page 3.9-16 that despite the modified estimated inundation zone, impacts from flooding resulting from the project implementation would be less than significant.
13	Q	16. Impact 3.9-3 does not analyze the potential for erosion of the existing PVSD which could create a significant impact that requires mitigation and additional environmental analysis.	See response to Comment 13F. The emergency release facility discharge to the Perris Valley Channel would be conducted through a weir to reduce velocity and scour potential. Otherwise, the Perris Valley Channel is designed to accommodate peak flows from the watershed with minimal scour.
13	R	17. Impact 3.9-4 does not address the potential for additional surface water impacts to the surrounding area due to an emergency release into the existing PVSD.	Impact 3.9-4 describes that the emergency release facility would serve as a fully built out Line U to address surface water drainage in the local watershed. Flooding impacts are addressed in Impact 3.9-7, 3.9-8, 3.9-9, and 3.9-11.
13	S	18. Impact 3.9-7 does not address the potential significant impacts associated with the existing condition of the PVSD and the potential for erosion, which could contribute to polluted runoff.	See response to Comment 13F. The emergency release facility discharge to the Perris Valley Channel would be conducted through a weir to reduce velocity and scour potential. Otherwise, the Perris Valley Channel is designed to accommodate peak flows from the watershed with minimal scour. The emergency release facility would be designed to minimize sediment loads during an emergency drawdown resulting from scour.
13	T	19. Impact 3.9-9 does not account for the impacts associated with the new inundation areas, which are vulnerable to flooding because they have existing development or approved developments within them.	See response to Comment 13P.
13	U	20. Impact 3.9-11 provides only a qualitative discussion of impacts as a result of an emergency release. Although the DEIR indicates that impacts can be minimized through the operation and maintenance of the facility, it does not provide an in-depth review of the impacts associated with a full release on the existing condition. Until this information is provided, the significance of the impact cannot be known.	See response to Comment 13P.

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13	V	21. Impact 3-12.4 does not adequately address the potential impacts associated with the relocation of existing utilities in Evans Road and the potential reconstruction of the intersection at the Ramona Expressway and Evans Road as a result of the bridge crossing the Western Segment. Because the design work for this work is not provided, the significance of the potential impacts of this work cannot be properly identified and mitigated.	See response to Comment 13K.
13	W	22. Mitigation Measures TRANS-1 in section 3.14, does not provide for the potential measures needed for the phased construction of the bridge on Evans Road.	Mitigation Measure TRANS-1 outlines temporary traffic lane modifications that would be employed to minimize disruption of traffic during the construction of the bridges. Figures 3.14-2 and 3.14-3 describe where these lane modifications would be located for both the two-phased and three-phased construction options. The comment does not suggest any additional measures that would be needed.
13	X	23. The alternatives analysis is deficient. There is no analysis of (i) alternate locations for the Project, or (ii) an alternative that modifies any of the Western Segment of the Project. In addition – and this is one of its most glaring shortfalls – the DEIR does not address any of the impacts resulting from the proposed full closure of Evans Road to construct the bridge.	The possible routes for connecting the Perris Dam emergency release structure with the Perris Valley Channel are limited. The alternatives analysis in Chapter 6 of the Recirculated Draft EIR describes a Rider Avenue Alternative that would relocate the channel along Rider Avenue. The Recirculated Draft EIR describes that this route would be infeasible due to the need for hard rock tunneling under Ramona Expressway near to the existing Colorado River Aqueduct and other large underground facilities owned by Metropolitan. The placement of the emergency release facility over the underground Colorado River Aqueduct would not be acceptable to Metropolitan, which is the reason the corridor is not currently developed. Impacts 3.14-1 of the Recirculated Draft EIR discussed impacts associated with the partial and full closure of Evans Road, in particular page 3.14-17 discussed Option A-Partial Closure, Evans Road Bridge Constriction and page 3.14-19 discusses Option B-Full Closure, Evans Road Bridge Construction. Both options conclude that impacts at Evans Road would be considered significant during construction.
13	Y	24. The DEIR also fails to address the need for property acquisition or easements for construction access and staging areas. None of these long-term or short-term impacts have been addressed.	The Recirculated Draft EIR describes the project construction footprint along the Western Segment in Chapter 2 mostly within the existing DWR right-of-way. Figure 2-5 shows that staging areas may be needed adjacent to the right of way. Should final designs determine that access is needed in these proposed staging areas, DWR would either negotiate an easement with the property owner or provide staging areas in other locations. The Draft EIR adequately evaluates the impacts of using these areas for construction.
13	Z	Accordingly, the DEIR must be supplemented to address the above issues and recirculated for further public review and comment prior to certification.	The proposed project is described in Chapter 2, including a distinct construction footprint and construction impact zone shown in Figure 2-5. The

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		(14 Cal. Code Regs. Section 15088.5.) Please be aware that Mission Pacific is continuing to review the DEIR, and will have additional comments to present prior to agency action on the Project. Lastly we request a meeting with representatives of DWR to discuss these and related issues.	Recirculated Draft EIR identifies and adequately addresses each of the issues raised in the comment letter. Recirculation of an additional environmental document is not required.
13	AA	Webb Associates has reviewed the information provided by Ms. Delia Grijalva of the Department of Water Resources (DWR) for the proposed DWR Outlet Channel for the Lake Perris Emergency Release Facility. The channel as presented would extend from the connection at the Perris Valley Storm Drain (PVSD) easterly along the Ramona Expressway alignment to a point just east of the Perris Valley Fairgrounds. The portion of the channel between the PVSD and Lake Perris Drive (approximately 2600') is directly adjacent to property owned by the Mission Pacific Land Company. The information provided by the DWR is very preliminary in nature and additional information will be necessary to address all the constraints associated with the design. Our review focused on the potential design constraints that the channel should address and potential impacts to the Mission Pacific Land Company property. In addition to the preliminary plan and profile for the channel, channel cross-sections and limited hydraulic information was provided. DWR also indicated that bridge crossings can have no contact with the water surface and must span the entire channel .based on this information, we have the following comments:	Comment noted. See response to Comment 13A.
13	BB	**<u>Channel Design</u>** 1. The preliminary design information of the proposed weir structure is missing from the documentation. Based on the limited length of this structure, as shown on the provided documentation, it does not appear that the proposed levees are high enough to contain the peak discharge of 3,800 cfs and to allow for flow over the top of the weir. As the DWR assumes zero freeboard in the levee channel system, this will require additional analysis for the design of the channel system.	See response to Comment 13B.
13	CC	2. The preliminary design proposes to use a levee system along both sides of the channel. As the proposed grading currently depicts, the toe of slope would encroach into property owned by Mission Pacific Land Company. Additionally, until such time that a slope stability analysis and the levee height analysis can be determined, the extent of the encroachment into Mission Pacific Land Company property	See response to Comment 13C.

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		cannot be fully determined.	
13	DD	3. The area between Evans Road and the PVSD is proposed to be a retention basin for the PVSD. Since the channel proposes a levee along this reach, the slope stability analysis will need address this condition so the basin is not impacted due to slope failure.	See response to Comment 13D.
13	EE	4. Based on the hydraulic information and channel design information provided, it appears that the DWR assumes that the PVSD is empty at the time of the emergency release. If the PVSD is not empty at the time of the emergency release, then the weir structure may not operate properly and additional flooding as a result of overtopping the levee may occur. This could not only impact Mission Pacific Land Company's property, but may also impact Ramona Expressway.	See response to Comment 13E.
13	FF	5. The channel plans depict the channel intersecting the PVSD at a 90 angle. Based on the limited width of the PVSD and the velocity of the emergency release flow, it is uncertain that the flow will stay within the PVSD or escape the PVSD on the opposite side of the channel and flood westerly. In the event the flow does stay within the confines of the PVSD, additional hydraulic analysis will be necessary to analyze any hydraulic effect on the weir structure.	See response to Comment 13F.
13	GG	6. According to the Riverside County Flood Control and Water Conservation District's Master Drainage Plan for Perris Valley, the proposed channel is along the same alignment as the regional flood control channel, Line U. The DWR will need to provide direction on the intent of incorporating Line U into the proposed DWR channel.	See response to Comment 13G.
13	HH	**Bridge Design** 1. The bridge width shown on the preliminary documents are not consistent with the ultimate intersection geometry for Evans Road. Based on information, the bridge width will need to be increased from 104' to approximately 120' wide.	See response to Comment 13H.
13	II	2. Since the channel is proposed as a levee system and the DWR has indicated that any bridges cannot touch the water surface, this means that the bridge will need to be elevated over the current Evans Road elevation. This may require significant reconstruction to the intersection of Evans Road and Ramona Expressway and may also require reconstruction of Evans Road along the frontage of	See response to Comment 13I.

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		Mission Pacific Land Company's property.	
13	JJ	3. The DWR has also indicated that any bridge must span over the entire width of the channel. A bridge span of the length, estimate from the preliminary documentation, does not seem feasible without some sort of pier support. Based on our preliminary review of the information, we have estimated either a slab bridge with piers at 40' on center or a precast girder bridge with a single center pier. We have also developed an estimated water surface water elevation over the weir based on the preliminary information at the bridge as an elevation of 1454.0. Assuming one foot of freeboard under the bridge and a bridge deck thickness ranging from 1.5' to 6' based on the type of bridge, the bridge deck elevation will need to be between elevation 1456.4 and 1461.0. The existing elevation of the intersection of Evans Road and Ramona Expressway is approximately 1452.0. As mentioned previously, this will require significant reconstruction of the street intersection and reconstruction of Evans Road long Mission Pacific Land Company's property.	See response to Comment 13J.
13	KK	4. The expansion of the bridge width and the increased elevation of the bridge will have a significant impact on the existing utilities within the bridge footprint. The Southern California Edison (SCE) transmission pole will need to be relocated outside of the bridge footprint. Due to spacing requirements, this could lead to relocation of additional SCE poles. Additionally, the traffic signals and street lights will need to be relocated as part of the intersection reconstruction. There are both a potable and non-potable water lines that will require significant relocations to avoid the bridge abutments and piers. These relocations may also be affected by potential scour of the emergency release flows. While the sewer line appears to be significantly below the channel flowline, the design of the bridge abutments and piers may impact the existing facility and require that the facility either in encased in concrete or redesigned to incorporate a lift station to mitigate any potential impacts.	See response to Comment 13K.
13	LL	Based on our review, we would recommend that a coordination meeting be arranged with the DWR, the City of Perris, the Riverside County Flood Control & Water Conservation District, and Mission Pacific Land Company to review the proposed channel and establish design constraints to facilitate the design process. If you have any additional questions regarding this analysis, or need any	Comment noted. This comment does not describe an inadequacy of the Draft EIR, and no further response is required.

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		additional back-up information, please give me a call at (951) 686-1070.	
Letter 14: Val Verde Unified School District			
14	A	The Val Verde Unified School District (District) appreciates the opportunity to comment on the Draft Environmental Impact Report (EIR) for the Perris Dam Emergency Release Facility project. The District has the following comment: 1. The District is opposed to the complete closure of Evans Road (Option B) during bridgework activity. Closure of Evans Road for one year will create a significant impact to nearby schools by worsening traffic conditions in the area.	Comment noted. DWR would require the contractor to prepare a Traffic Management Plan to alleviate potential traffic issues associated with the full closure of Evans Road.
14	B	2. The District concurs with the City of Perris that the traffic signal timing should also be modified at the Evans Road and Ramona Expressway and further south at the traffic signal on Morgan/Evans near May Ranch Elementary School. I have enclosed a District map showing school locations as well as a District Calendar to assist you with further planning. Again, thank you for the opportunity to comment on the Draft EIR. If you require additional information or clarification, please contact me at (951) 940-6100 ext. 10652.	Comment noted. DWR will require that the contractor prepare a Traffic Management Plan. As stated on page 3.14-12 of the Recirculated Draft EIR, the plan will identify specific traffic control measures to ensure access and safety on the local roadway network is maintained, which may include the use of traffic control personnel along Ramona Express and Evans Road. In addition, as stated on page 3.14-12, the Traffic Management Plan would include temporary reprograming of traffic signals to ensure traffic flow and follow-up analysis. See response to Comment 15C.
Letter 15: Public Meeting Oral Comment Transcription			
15	A	My name is Kenneth Phung, I am with the City of Perris. We appreciate you working with us throughout the draft EIR. Not only from the City's standpoint, but all also all of the other residents and local businesses in the area, the Fairgrounds. In relation to that, there are some concerns that we have in the draft EIR. I think you mentioned that there is full closure or partial closure. I think from the City's standpoint, partial closure is the recommended approach. I think any time you have full closure there are too many impacts to the residences and commercial businesses in the area. So if you proceed we want you to proceed with the partial closure option.	Comment noted.
15	B	In relation to that, in terms of the traffic impacts, I think some things you should probably consider is probably retaining additional police services during the peak hour just for them to monitor traffic to make sure that safety concerns are addressed and people are not speeding. See if individual funding somehow exists for that. I think it's good to have an ongoing traffic consultant out there initially so that they can monitor the beginning process…	See response to Comment 3B. The Traffic Management Plan will provide for proper implementation of the proposed project in order to ensure safety within the local roadway network. In response to this comment, the following addition was made to page 3.14-12 of the Recirculated Draft EIR: *Page 3.14-12 of the Recirculated Draft EIR*

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		So that way we can figure out during the process if we need to adjust the signalization, so that we can adjust during the process. I think that would reduce some issues. I think we want to work with County and City of Perris, not only the county but the City of Perris also. Other concerns that we have, construction hours, you mentioned, you really want to do nighttime construction.	• A schedule of lane closures over the construction period • For partial road closure options, measures to maintain traffic flow at all times across the construction zone, including lane re-striping and channelization; installation of temporary safety barriers and crash cushions; advance warning signs and message boards; and temporary re-programming of traffic signals. • <u>For all signals and intersections requiring modifications due to project construction, a follow-up traffic analysis will be conducted to ensure the efficiency of the changes.</u> • Lane closure notifications to the County of Riverside Department of Transportation, City of Perris, and local emergency services providers. As stated on page 3.14-12 and throughout the document, a Traffic Management Plan will be prepared prior to project construction. The plan will identify specific traffic control measures to ensure access and safety on the local roadway network (Ramona Expressway, Avalon Parkway, Lake Perris Drive, and Evans Road) and within the Lake Perris SRA and Lake Perris Fairgrounds are maintained and that appropriate agencies and personnel (California Department of Forestry and Fire Protective Services, Riverside County Fire Department, Riverside County Sherriff's Department, California Highway Patrol, and State Park Rangers) are contacted ahead of any closures due to implementation of the proposed project.
15	C	Our opinion is that you should only do it from 7am to 7pm, which is the construction standard for our project at Perris. The reason for that is because there are residents close by, businesses close by that operates at night, the Fairgrounds operate at night. You have residents that live just right across from Ramona Expressway. Even a little noise would affect someone's sleep. So I think it is really important that you stick to a plan and say you really will not do it at nighttime. I think you should really look at that.	As stated on page 2-15 of the Recirculated Draft EIR, in general, construction activities would occur between 7:00 a.m. and 7:00 p.m. However, nighttime work may be particularly needed during construction of the bridges. The closest business to the proposed project construction activities would be the Fairgrounds for which the Fairgrounds Segment would traverse the property. The next closest business is located over 1,200 feet from the construction impact areas. Implementation of Mitigation Measures NOISE-1 through NOISE-4 would help reduce noise levels within and surrounding the proposed project area through limiting of nighttime work activities, requiring of specific equipment usage, daytime work restrictions, coordination with the Department of Parks and Recreation for proper signage, and proper notification of nighttime work. In addition, DWR will work with the Fairgrounds in order to minimize activities during the County Fair.

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15	D	Other than that, just construction traffic. If there is any way you can move it off of Ramona Expressway. There is already a lot of traffic, the early morning or the late evening when people are coming home. Any way that you can push off traffic one way or another away from Ramona Expressway, that would alleviate some concerns or alleviate traffic.	As shown on Figure 2-5, the majority of the construction traffic will be contained within the project site and north of Ramona Expressway along designated haul routes and temporary construction access roads. A small portion of the proposed haul route could travel along Ramona Expressway between Lake Perris Drive and Evans Road. Use of Ramona Expressway would be limited. The temporary access roads would be used whenever possible instead of the haul route along Ramona Expressway.
15	E	The last thing is, I think it is your plan already, just make sure construction staging is off from Ramona Expressway. Any way to run traffic internally, minimize traffic on Ramona Expressway. Those are our concerns for the City of Perris. Correct, we'll send a letter in a couple of weeks.	As shown on Figure 2-5 of the Recirculated Draft EIR, there are no staging areas proposed on Ramona Expressway. All staging areas would be located within private property, the Fairgrounds, or DWR-owned property.
15	F	Catherine: My main concern is of Evans Road. I live south of Ramona Expressway and east of Evans road. In the morning, traffic is very heavy there at Ramona expressway and Evans because of school traffic and the kids going to Rancho Val Verde up there; and the traffic is tremendous there in the morning. It takes you almost 30 minutes to go from Ramona Expressway and up to the school because with all the kids getting dropped off and in the street and stuff; and in the evening it's the same way. So if you close this off completely it will be like shutting us off from going to Moreno Valley and lot of us go shopping in Moreno Valley. There would only be one way to go would be Perris Boulevard or take the freeway and you got to go way back down and even if you take Perris Boulevard, you still have to go back down to the shopping area to shop at. So this would be really, really inconvenient to the residents there. Tom B: Yes, thank you for the comment, we appreciate that. There is a detour map that we have here as well, but that's an excellent comment.	Comment noted. At this preliminary stage of design, DWR has not yet determined whether the partial or full closure would be required at the Evans Road intersection. A detour route was included in the Recirculated Draft EIR as Figure 3.14-1.
15	G	Catherine: And the other concern I have is um, the… you spoke about the liquefying of the dam if we have an earthquake, ok; my concern is why is the City still allowing the builders to continue building these houses below the dam? Tom B: That's a good question that I can't answer today but I can say that the department as you're witnessing over the past year, and will continue to work and remediate the dam per the standards of the division of safety dams and that process is ongoing. That's a good comment and put in the record.	The City of Perris has adopted a General Plan that identifies appropriate land uses in the area below the Perris Dam. The primary objective of the proposed project is to increase safe operations of the existing Perris Dam through the construction of an Emergency Release Facility. This comment does not describe an inadequacy of the Draft EIR, and no further response is required.
15	H	Jasmine: I have a question and you won't be able to answer it right now. I am a resident off of Evans and Ramona Expressway; we are literally by the dam. Why are we doing unlined channels? If there were contamination, that would ultimately go into the ground, and we just don't want to repeat history. People	Existing stormwater channels in the area currently are unlined channels. The project would introduce no more vehicles than already utilize the area.

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		have dealt with contamination before and if it is going to be a long term project then you want to avoid any other projects in the future. Think about that.	Impacts to water quality would not be increased. See also response to Comment 9BB.
15	I	Another thing is the noise pollution; it causes a lot of stress and agitation. There are many studies out there that show the impacts that it has on humans. That is definitely one of the biggest concerns.	As stated on page 3.11-20 of the Draft EIR, the proposed project would not exceed the established noise level standards at the nearest noise receptors. The City of Perris requires that construction noise at the nearest residential zones do not exceed 80 dBA. As shown on Table 3.11-1, the conservative noise levels at the nearest single-family residential uses located southwest of the project site and south of the project site, across from Ramona Expressway would remain under 80 dBA, at 79.8 dBA. In addition, Mitigation Measure NOISE-3 outlines certain requirements imposed on the construction contractor to help reduce construction noise.
15	J	As well as the stress that is coming from the traffic, definitely for the partial closure of Evans since that is the only route to get home; unless you want to go a further route which is of course more expensive on gas and more impact on the vehicles.	Comment noted. This comment does not address any inadequacies with the Draft EIR and no further response is required.
15	K	And if we could not have operation at night, just because that is the only window of sleep. That's when traffic dies and we can finally relax and not hear the cars passing by and we don't want to hear construction at night, and let us know what the operation hours are; so if the construction hours are at 7am and they start at 6am to finish faster, we don't want any violation of that, if you were to go that route, which we hope you wouldn't. Tom B: Ok, thank you for those.	Comment noted. As outlined on Mitigation Measure NOISE-2, signs will be posted at the construction sites that include permitted construction days and hours. In addition, Mitigation Measure NOISE-3 requires that resident be notified in advance of the nighttime work schedule.
15	L	Richard: My name is Richard Tovar with the Riverside County Fire Department, Cal Fire. I work with the Chief of Planning Bureau. So we directly have interest in the EIR. The question I have is, you said three years is the downtime? Construction time? Tom B: Yes, 3 years of construction time. And the different options are 12 months or 24 months on the bridges.	Comment noted and addressed during the meeting.
15	M	Richard: Ok, now you said you were going to do complete closure on Evans? Tom B: The options for Evans are complete closure, yes. Richard: The problem is this falls under State Responsibility Area (SRA), so by closing Evans you pretty much kill all traffic coming in as far as fire engines for any state responsibility requirement that we have. You're going to get about 5-10 rigs right off the initial dispatch, so by moving that road and completely closing it; you're bringing all the traffic off of Bernasconi; which	Comment noted. See response to Comment 3B. Mitigation Measure UTIL-1 of the Draft EIR requires implementation of a temporary emergency access road for use only by emergency responders as an alternative to the detour route and to help minimize interruptions.

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		there is no access for, the secondary access is on the north side. So we are going to recommend for a partial closure, because that significantly increases our response times. And there are engines coming from Nuevo, Perris, Moreno Valley, or Mead Valley, so that's your first five engines, now tack on an additional 10-minute response detour, that means we have to manually input this into our CAD system; so those detours are actually going to throw off the count of engines now coming in from San Jacinto. Moreno Valley being the larger metropolis of the suburban area, you're going to pull fire engines from that portion, when they should belong to the City of Moreno Valley. So it is going to impact us pretty significantly.	
15	N	Now when you say 3800 cubic feet per second (cfs); that's a significant amount of water. We are not so much concerned…cause you're building these levees from the point of origin downstream, what are we going to do for downstream into the City of Perris? Tom B: Yeah so the water will be conveyed to the Perris valley channel and down to a reservoir downstream within flood control structure that exists now. Richard: That goes between Redlands and Perris? Tom B: Conveyance will go to a channel in the south and ultimately to lake Elsinore.	Comment noted and addressed during the meeting. Figure 3.9-3 of the Draft EIR includes an inundation comparison figure showing the path of the released water south of the dam.
15	O	Richard: Cause it crosses by San Jacinto and 4th Street and that whole section. So what kind of notification are you going to give the fire department if we do have a release? Is it going to go through state parks? State parks to our dispatch center, or? We just want to make sure we have constant communication on any type of road closure because that is going to impact the residents of Perris, Moreno Valley, Nuevo, and Mead Valley; just because of the way our CAD system operates.	Information regarding notification to local and state agencies in the event of an emergency release will be outlined in DWR's Emergency Operations and Maintenance Manual. **[DWR to please confirm]**
15	P	Is this going to be appropriate if we do put all our comments in an email and send them to you so I don't take up too much time? Tom B: You bet. And obviously these are critical comments and will be considered for sure, but your input is very important so if you write it down and send it to us or give it to me tonight. You can also stay after and talk to DWR folks here.	Comment noted and addressed during the meeting. This comment does not address any inadequacies with the Draft EIR and no further response is required.
15	Q	Catherine: I have another question. Do you need my name again? Catherine Fields So my other question is about the release valves; looking at the map, it looks like to me that you have a release valve coming towards Ramona	The probability that an emergency drawdown operation of the reservoir will ever be required is extremely low. The project currently underway to strengthen the Perris Dam foundation will further reduce the likelihood that an emergency release will ever be needed. Figure 3.9-3 of the Draft EIR includes an inundation map comparison between the dam's inundation area

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		Expressway? Tom B: Yes. It's right down here, here is the dam obviously and this is where the existing valve is. Catherine: Ok, so when all this water, if this dam happens to liquefy…the water that's coming from the lake, that water is going to be coming toward the south? Am I right? Tom B: This facility was built before the residential area; there is a map in the area that shows where inundation zone would be if dam were to release. Our project substantially prevents that residential area form being inundated. Catherine: But if we happen to have an earthquake of 7.2; so when the water comes out and then the lake liquefies the waters, the riverbed won't be able to take all that water at one time, so it may splash. And it will come over to us on that side! Tom B: That's a fair question and I appreciate the comment on that. Again going back to full dam failure, is going to be avoided by the project being proposed. They are changing structure of dam to avoid overtopping or breaking of dam to into scenario like you are pointing out. Clearly the community below the dam needs to be concerned about that. That is why DWR is doing this remediation program and is underway. This valve, if it were to be needed, would be in case of quick drawdown. If an earthquake were to happen, that's what this valve is used for. It is designed for a controlled release. Catherine: I understand that but I still can't see…. just like a flood in different countries and cities that they have big water floods, say in Louisiana. Ok the dam cannot take it all, so where did all the water go? It went into the neighborhoods and to the cities and everything. So to me, if we should have a 7.2 earthquake, this water is going to still end up splashing from it, and we will still get the effect from it. To me, they way I'm looking at it, that we should get it all the way from that release valve and that won't be able to take all that water at once. So that means that, the houses below the dam, they are in trouble. Tom B: Well I appreciate the comment, but I would say they aren't, but the facility is again, well designed and are being remediated to ensure public safety. There are DWR folks here in the room with name tags that are responsible for operating this facility and know how it's built so there is an opportunity to talk to them about it. Catherine: Ok I will.	in case of a release with and without the proposed emergency release facility. As shown, the current inundation zone without the includes large areas of residential development. The proposed project would help significantly reduce this exposure.

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15	R	Brad: Yeah, I have a question. At the actual dam itself, it's a smaller, more enclosed channel more or less, right? That first part there, you'd called it enclosed or a berm or? Tom B: Over here? This one? Brad: There, until it turns around at the Fairgrounds… Tom B: Yeah, the blue and yellow, because it's actually a 10 foot tall earthen berm so it would simply guide surface water flow across the grassland here. The yellow is indicating a road. So there would be a road on top of it and water would surface flow across here to this point and then go channelized and south into the controlled channel. Brad: Ok thank you. So then basically where it turns brown, it would have a wider spread? Tom B: Well it would actually be a channel, so like a culvert or trapezoidal channel where water would be conveyed as a normal flood control channel. Whereas this, is simply a levee.	The comment was addressed during the meeting. The portion of the release facility through the Lake Perris SRA would be constructed as consists of a 10-foot tall earthen berm guiding the released water toward the Fairgrounds Segment which would consist of an earthen channel connecting all the way to the Western Segment and the Perris Valley Channel. See Figure 2-2 of the Recirculated Draft EIR for a depiction of the proposed project components.
15	S	Brad: Ok, but you said we would still be able to use that for parking? Tom B: There is an option, one of the alternatives evaluated in the EIR is that lake Perris fairgrounds portion on this side, could be structured such that it was dual use. And again, that is an alternative evaluated in the EIR.	Comment was addressed during the meeting. As described on page 2-11 of the Recirculated Draft EIR, the proposed project includes a Dual-use Alternative which would allow for construction of the channel along the Fairgrounds Segment to be used for parking and other Fairgrounds-related activities and still maintain a water conveyance function in the event of an emergency drawdown.
15	T	Brad: With that point, hypothetically, so you'd do the option where so you have parking and cars and oil and what not, but then you also said it has the potential to be used as flood control channel. So you have a point source of pollution going down the channel, you have a TMDL issue here going to Elsinore, who is liable and that does ultimately becomes either an emergency or under normal conditions, flood control wise. And also, if it would become flood control, and there is that much water, you would start having issues as far as plant growth, if the EIR hits issues like that…Who would be liable as far as land use, or maintaining, or being liable for any changes in uses there? Tom B: That's a great question and um let's leaves it at that, but there are points in the EIR that speak to that but those are really good. Any other comments?	See response to Comment 9BB and 15H. As stated on page 3.1-9 of the Draft EIR, the channel will either be maintained by DWR or DWR will enter into a maintenance agreement with RCFCWCD for the joint use of the facility. If DWR is the main entity in charge of channel maintenance, an Emergency Operations and Maintenance Manual will be developed for the channel. This manual would include periodic trash and debris collection and vegetation management. In addition, the manual would include periodic visual checks of overall channel function and detailed steps on how to deal with maintenance issues.
Letters Received during the Recirculated Draft EIR Comment Period			

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Letter 16: City of Perris			
16	A	The City of Perris appreciates the opportunity to comment on the recirculated Draft Environmental Impact Report for the Perris Dam Emergency Release Facility project. In reviewing the document, the City supports the following phasing options as continued access will be available on Evans Road and Lake Perris Drive during construction: • Option A – Partial Closure at Evans Road (3-part construction) • Option A – Partial Closure at Lake Perris Drive • Option B – Temporary Paved Detour – Full Closure at Lake Perris Drive The City does not recommend phasing Option A – Partial Closure at Evans Road (2-part Construction) as the roadway alignment is skewed. The City of Perris looks forward to a response to these recommendations. We request that these comments be addressed prior to certifying the EIR. Please include the City on any future mailings regarding this project. If you have any questions or concerns, please do not hesitate to contact me at (951) 943-5003, extension 257.	Comment noted. The City's recommendation will be taken into consideration when deciding the final project construction plan. However, this comment does not address any inadequacies with the Draft EIR and no further response is required.
Letter 17: The Metropolitan Water District of Southern California			
17	A	The Metropolitan Water District of Southern California (Metropolitan) has reviewed the Notice of Availability of the Recirculated Draft Environmental Impact Report (RDEIR) for the Perris Dam Emergency Release Facility (Project). The California Department of Water Resources (DWR) proposes to modify Perris Dam's existing emergency release structure and construct a water conveyance facility that would reliably control a reservoir release and convey emergency flows from Lake Perris in the event of an emergency drawdown. The proposed project would be constructed partially within the Lake Perris State Recreation Area (SRA) and Lake Perris Fairground, just north of Ramona Expressway, and would connect to the Perris Valley Channel. The proposed project includes: • Modifying the existing emergency release structure by removing the existing bulkhead and replacing it with one or more automated valves • Constructing conveyance facility improvements that would control a maximum reservoir release up 3,800 cubic feet per second and convey emergency flows from Lake Perris in the event of an emergency	Comment noted. This comment does not address any inadequacies with the Draft EIR and no further response is required.

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		drawdown. • Constructing two levees, with a combined length of approximately 6,685 linear feet, to direct flow from the emergency release structure toward a new drainage basin and concrete weir located at the edge of the SRA and Fairground.	
17	B	Metropolitan previously provided correspondence in October 2016 (enclosed) in response to the September 2016 DEIR stating concern with the Project's potential to affect Metropolitan's 120-inch-inside-diameter pre-stressed concrete Lake Perris Bypass Pipeline (LBBP) within the limits of this project. Contact information for the Substructures Team was provided in that letter along with a copy of Metropolitan's "Guidelines for Developments in the Area of Facilities, Fee Properties, and/or Easements of the Metropolitan Water District of Southern California." Subsequently, in response to DWR's Dam and Canal Sections March 2017 submittal additional Project details, Metropolitan's Substructures Team advised DWR that the proposed main levee's location over the existing ground in the area of the pipeline is not acceptable. In the Substructure Team's March 29, 2017 response (enclosed), Metropolitan further advised DWR that a geotechnical analysis addressing the increased load, induced instability, and deformation of the pipeline was required and recommended a meeting to discuss the Project in detail. To date, the Substructures Team has not been contacted by DWR to meet and based on our review of the RDEIR, the Project still includes construction of the main levee across the LPBP. Accordingly, the RDEIR should include an analysis of the Project's potential environmental impacts associated with construction and operation of the main levee across the LPBP.	DWR will coordinate excavation efforts with all responsible agencies within the proposed project area with the potential to be impacted by project construction, including Metropolitan Water District. DWR will work with Metropolitan Water District to ensure that the underground infrastructure crossed by the levee is not damaged due to the additional weight of the levee. Measures implemented to protect the buried pipeline would utilize construction methods identified in the Project Description including excavation and pouring concrete. The effort would be entirely within the identified construction zone and would not result in any new environmental impacts. See response to Comments 6A through 6D.
17	C	In addition, please revise Table 2-3 on page 2-22 in the RDEIR to indicate that in addition to excavation activities occurring near Metropolitan's LPBP that the Project's main levee would be constructed over the pipeline.	The Table 2-3 has been revised as show in response to Comment 6B.
17	D	We encourage you to coordinate further with Metropolitan's Substructures Team (Ms. Shoreh Zareh at (213) 217-6534) regarding the Project's crossing of the LPBP and requirements for development near our facilities. We appreciate the opportunity to provide input to your planning process and we look forward to receiving future documentation and plans for this project. For further assistance related to this letter, please contact Mr. Alex Marks at (213) 217-7629.	Comment noted. Mitigation Measure UTIL-2 requires that DWR conduct an underground utilities search prior to construction activities. DWR will coordinate with Metropolitan prior to working near Metropolitan facilities.
Letter 18: Friends of the Northern San Jacinto Valley			
18	A	This will be the third time the Friends of the Northern San Jacinto Valley have provided CEQA comments on the Department of Water Resources (DWR)	DWR received comments from the Friends of Northern San Jacinto Valley on the Perris Dam Remediation Program EIR and provided responses to those

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		Environmental Documents for this project. Our first comments were made back in 2010 on the Perris Dam Remediation Program Draft EIR. This early EIR analyzed three separate project components (1) Perris Dam Remediation, (2) Outlet Tower replacement (3) Emergency Outlet extension. Our second comment letter in 2016 was on the Draft EIR for the proposed Emergency Release facility (formerly named the emergency outlet extension), which is intended to allow DWR (Division of Safety of Dams) to safely convey water released from lake Perris in the event of an emergency, by diverting the flow away from residential development below the dam and channel the flow towards the Perris Valley Channel. This third CEQA public comment letter is on DWR's recirculation of portions of the 2016 Draft EIR for the proposed Perris Dam Emergency Release Facility. Thus far DWR has not provided responses to our earlier comment letters or has been dismissive of our concerns. It is our expectation with this comment letter DWR will provide creditable, professional responses to our legitimate issues and impacts of concerns.	comments prior to certifying the Final EIR. Comments received on the 2016 Draft EIR are responded to in this document as Responses to Comments 8A through 8E in accordance with CEQA requirements.
18	B	Attachment A provides excerpt (pages 2-1 to 2-19) from the 2010 Perris Dam Remediation Program Draft EIR. DWR does not acknowledge the proposed Perris Dam Emergency Release facility is functionally connected to the existing Perris Dam Outlet Tower facility: "*The function of the emergency outlet facility is to convey water to MWD's delivery facility…and to have the ability to release water from the lake when required during emergencies for safety of the dam"… "The structural integrity of tower was evaluated in 2006 and was found to be deficient in shear capacity under pre-2008 seismic loading which would cause a failure of the structure. "several potential alternatives were considered to retrofit the tower, but none were found to be viable to reinforce the structure, given complexities of construction with water in reservoir, thus construction of a new tower is required*." (see Attachment A – Outlet Tower Replacement, pages 2-6 to 2-7) "*DWR is proposing to construct a new outlet structure as a replacement facility, because the existing tower may fail during a major earthquake*." (see Attachment A – 2.5.3 Outlet Tower Replacement, page 2-15) Apparently to avoid cost, DWR does not acknowledge the probable collapse of the existing outlet tower in a major earthquake, (a very likely occurrence in the earthquake prone project location) will render the proposed Emergency Release facility inoperable preventing the emergency release of water from the Perris dam. In addition the environmental document(s) indicate the present Perris Valley flood control channel cannot accommodate the emergency release of 3800 cfs. Thus, DWR needs to update/explain to the public in the Final EIR how the failure to replace the existing Outlet Tower and the current ability of the Perris channel to receive a emergency release of 3800 cfs will compromise the	See response to Comment 8E. The purpose of the current project is to modify the existing emergency release structure for the Perris Dam and to construct a water conveyance facility to connect with the Perris Valley Channel in the event DWR executes an emergency drawdown to drain the reservoir. The new conveyance facility will reduce the risk to public safety in the unlikely event of an emergency release from the reservoir.

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		public safety of the residences below the dam.	
18	C	Attachment B discloses to the public the "Memorandum of Agreement (MOA) Regarding Mitigation of State Water Project (SWP) Wildlife Losses in the Southern California" dated October 23, 1079. The subject Recirculation of the 2016 Emergency Release facility Draft EIR once again mistakenly refers to the Project site as the "SRA segment" [State Recreation Area Segment} and ignores/disregards the prior assignment of these public lands to the Department of Fish and Wildlife (DFW) as mitigation for wildlife losses resulting from the construction of the State Water Project (SWP) pursuant to the Legislature enactment of the Davis-Dolwig Act. After the MOA was enacted these public lands were included within the boundary of the San Jacinto Wildlife Area (SJWA). Subsequently, the Stephen's kangaroo Rat Habitat Conservation Plan (SKRHCP) and the western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) designated the SJWA lands below the Perris dam a SKR Core Reserve/MSHCP Conservation Land under the "take" provisions of the State Natural Communities Conservation Planning Act (NCCP Act- Fish and Game Code §§ 2800-2835). DWR continues to ignore or acknowledge the MOA term #6 indicating the state lands in front of Lake Perris Dam: "*…Shall be designated and made available for wildlife mitigation purposes. Uses of these lands for other purposes will not be allowed if such uses impinges upon the maintenance of wildlife populations, except as needed for SWP operations. DWR will replace such lands taken with lands acceptable to DFG*." [Note: DFG name changed by Legislature in 2012 to DFW]	DWR acknowledges the MOA provided as an attachment to the comment. As noted in the comment, the MOA states that the area in front of Perris Dam may be utilized to support SWP operations. Construction of the Emergency Release Facility is necessary to ensure the effective operation of Perris Dam. This proposed use is clearly consistent with SWP operations and in the interest of maintaining public safety. As noted on page 2-6 of the Recirculated Draft EIR and shown on Figure 2-6, as part of the project, approximately 2.3 acres of non-habitat would be restored within the SRA to compensate for permanent loss of habitat required by the new levee road. Mitigation Measure BIO-2c requires the levee slopes to be restored to support habitat. DWR commits in BIO-2c to successful restoration of the levee slopes or permanent conservation elsewhere if the restoration does not meet performance standards approved by CDFW. This restoration would ensure no net loss of habitat. Furthermore, Mitigation Measures BIO-2a requires that occupied SKR habitat impacted by the project be replaced at a minimum 1:1 ratio pursuant to the requirements of the SKRHCP. See response to Comments 1F and 1H.
18	D	Given the habitat destruction and continuing DWR disruptions of these designated wildlife conservation lands the Draft EIR needs to consider the MOA replacement alternative for the entirety of the SWP Mitigation lands remaining in front of the Perris dam. Replacement conservation habitat at the neighboring SJWA was a requirement when the former SWP mitigation lands [Fairgrounds Segment] were transferred to the Lake Perris Fairgrounds. The cumulative impacts of the Lake Perris Fairgrounds [auto and motocross tracks, truck parking, noise and light pollution] together with DWR's current and probable future habitat impacts have rendered the remaining MOA mitigation lands in front of Perris dam largely useless for wildlife conservation. [CEQA Guidelines § 15065(a)(3)]	The proposed project will result in no net loss to habitat below Perris Dam. The 2016 Draft EIR evaluates cumulative impacts to biological resources on page 4-6. The Draft EIR concludes that the project's contribution would not be cumulatively considerable since it would result in no net loss of habitat within the SRA. Furthermore, DWR has been consistent with the MOA which identifies the goal of maintaining conservation values in the area below the dam while accommodating responsible operation of the SWP.
18	E	The subject Draft EIR for the Emergency Release Facility mitigation measures BIO-2a, BIO-2b, and BIO-2c are biologically absurd and largely experimental [see Figure 2-4 Conceptual Levee Design], lacking in certainty […if no small mammal use within five years DWR will coordinate with USFWS and CDFW to determine an appropriate habitat compensation	See response to Comments 1F, 1G, 1H, and 1L. Furthermore, as noted on page 3.3-34 of the Recirculated Draft EIR, no federal or state listed species are located in the affected areas. Therefore, incidental take coverage under the MSHCP is not necessary. As noted on

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		property to be conserved in perpetuity], and constitute an illegal "take" [capture and release; exclusion until after project construction] of MSHCP covered species including the Stephens' Kangaroo Rat and the Los Angeles Pocket mouse (LAPM) [see Draft EIR Figure 3.3-3, Small Mammal Capture Data]. The impacts to MSHCP covered species cannot support the "*less than significant with mitigation*" findings by DWR and contradict the Mandatory Findings of Significance mandated by CEQA. [CEQA Guidelines § 15065(a)(1)]	page 3.3-34 of the Recirculated Draft EIR, DWR is committed to conducting additional small mammal surveys to ensure that listed species, in particular the SKR, are not present within the affected area. If SKR are found, Mitigation Measure BIO-2a requires compensation in compliance with the SKRHCP.
18	F	It is also necessary for DWR to recognize both SKRHCP and the MSHCP are "take" permits pursuant to the state Natural Community Conservation Planning Act [NCCP Act]. The legislature specifically included within the state NCCP Act section 2826 which provides: "*Nothing in this chapter [NCCP Act] exempts a project proposed in a natural community planning area form Division 13 (commencing with section 21000) of the Public Resources Code [CEQA} or otherwise alters or affects the applicability of that division*." DWR's improper implementation of the SKRHCP and the MSHCP is exacerbated by its failure to correctly implement its CEQA duties with regard to endangered wildlife. DWR must correct these CEQA deficiencies and submit a revised EIR for public review and comment prior to further consideration of the proposed Perris Dam Emergency Release Facility. Please notify us of the availability of the revised EIR for this project and thank you for your courtesy.	The 2016 Draft EIR and 2017 Recirculated Draft EIR comply with Section 21000 of the Public Resources Code. DWR has prepared the EIRs consistent with the requirements of the Public Resources Code to ensure transparent assessment of potential environmental impacts of the proposed project. As discussed on page 3.3-34 of the Recirculated Draft EIR, the project would not require incidental take authorization under the MSHCP since no covered species would be affected by the proposed project. See responses to comments from the wildlife agencies 1A through 1N.

CHAPTER 13
Mitigation Monitoring and Reporting Program

MITIGATION MONITORING AND REPORTING PROGRAM

Perris Dam Emergency Release Facility Project

Mitigation Measures	Implementation, Monitoring, and Reporting Action	Responsibility	Monitoring Schedule		
			Before Construction	During Construction	After Construction
Aesthetics					
No mitigation required.					
Air Quality					
AQ-1: The haul truck trips transporting rock material from the Perris Dam quarry in the Bernasconi Hills to the staging area below the Perris Dam shall be limited to a maximum of 74 round trips daily.	• Include Mitigation Measure AQ-1 in the construction contract specifications. • Perform site inspections to verify contractor compliance with truck trip maximum limits. Retain inspection records in the project file.	DWR	X	X	
	• Limit haul truck trips to a maximum of 74 round trips per day..	Construction Contractor		X	
AQ-2: Construction equipment and vehicles greater than 50 hp shall either have EPA Tier 4 engines or have engines that are retrofitted to include emissions reduction features that reduce emissions to the level of EPA Tier 4 interim levels.	• Include Mitigation Measure AQ-2 in the construction contract specifications. • Perform site inspections to verify contractor compliance with vehicle specifications. Retain inspection records in the project file.	DWR	X	X	
	• For equipment and vehicles greater than 50 hp, use EPA Tier 4 engines or have engines that are retrofitted to include emissions reduction features that reduce emissions to the level of EPA Tier 4 interim levels.	Construction Contractor		X	

DWR PERRIS DAM REMEDIATION PROGRAM MITIGATION MONITORING AND REPORTING PROGRAM (CONTINUED)

Mitigation Measures	Implementation, Monitoring, and Reporting Action	Responsibility	Monitoring Schedule		
			Before Construction	During Construction	After Construction
Biological Resources					
BIO-1: DWR shall conduct preconstruction rare plant surveys during the blooming period of the plants with potential to occur on-site. If rare plants are found to be present within or near the project impact area, the construction zone limits shall be staked, flagged, fenced, or otherwise clearly delineated by a qualified biologist to ensure that the construction zone is limited to minimize impacts on special-status plant species. These limits shall be identified in the construction drawings. No earth-moving equipment shall be allowed outside demarcated construction zones unless preapproval is obtained from a qualified biologist and in coordination with the USFWS and CDFW.	• Conduct preconstruction rare plant surveys during the blooming period. • If rare plants are found within or near the impact area, retain a qualified biologist to stake, flag, fence or otherwise clearly delineate construction zone limits. • Perform site inspections to verify contractor compliance with preapprovals for movement outside of demarcated construction zones. Retain inspection records in the project file.	DWR	X	X	
	• Do not allow earth-moving equipment outside demarcated construction zones unless preapproval is obtained from a qualified biologist and in coordination with the USFWS and CDFW.	Construction Contractor		X	
BIO-2a: DWR shall implement the following measures: • DWR shall have a qualified biologist with a Stephens' kangaroo rat handling permit conduct preconstruction surveys for the Stephens' kangaroo rat within the grassland habitat to determine and map the location and extent of Stephens' kangaroo rat occurrence(s) within the project impact area. Confirmed Stephens' kangaroo rat precincts shall be avoided with the establishment of a nondisturbance buffer zone approved by USFWS and CDFW. • Where avoidance of confirmed Stephens' kangaroo rat precincts is infeasible, DWR shall purchase credits at an approved Stephens' kangaroo rat mitigation bank or replace occupied-habitat at a 1:1 ratio, or as approved by USFWS, CDFW, and the RCHCA	• Prior to construction, obtain a qualified biologist to perform Stephen's kangaroo rat surveys to determine and map the location and extent of the kangaroo rat within the project area. • Where avoidance of Stephens' kangaroo rat precincts is infeasible, purchase credits at an approved Stephens' kangaroo rat mitigation bank or replace occupied-habitat at a 1:1 ratio, or as approved by the RCHCA. • Within the SRA, coordinate with the RCHCA to determine the appropriate compensation or remediation as specified in Mitigation Measure BIO-2.	DWR	X	X	

DWR PERRIS DAM REMEDIATION PROGRAM MITIGATION MONITORING AND REPORTING PROGRAM (CONTINUED)

Mitigation Measures	Implementation, Monitoring, and Reporting Action	Responsibility	Monitoring Schedule		
			Before Construction	During Construction	After Construction
• If an emergency drawdown inundates grasslands within the SRA, DWR shall coordinate with USFWS, CDFW, and the RCHCA to determine the appropriate compensation or remediation, if necessary. The consultation shall consider known and potential Stephen's kangaroo rat occurrences at the time of the drawdown event	• Perform site inspections to verify contractor avoidance of the nondisturbance buffer zone. Retain inspection records in the project file.				
	• Avoid confirmed kangaroo rat precincts by avoiding the established nondisturbance buffer zones.	Construction Contractor		X	
BIO-2b: Prior to initiation of construction, DWR shall place exclusionary fencing around the proposed work area within the SRA where small mammal habitat exists. Once fencing has been installed, a qualified biologist will trap and move small mammals, as well as other incidental wildlife, within the work zone to an appropriate location outside of the impact area. Trapping will occur no more than one week prior to the start of construction activities. Once construction has been completed, DWR shall remove the exclusionary fence.	• Prior to construction, obtain a qualified biologist to trap and move small mammals. • Perform placement of exclusionary fencing around the proposed work area no more than a week prior to construction. • Remove exclusionary fencing once construction is complete.	DWR	X		
BIO-2c: DWR shall prepare a Restoration Plan in coordination with USFWS and CDFW that identifies an appropriate seed mix for revegetation, hydroseeding methods, monitoring frequency requirements, and habitat performance criteria that will identify the minimum percent cover of restored vegetation along the affected areas. Monitoring shall be conducted to determine the presence of small mammal use of the restored levee slopes. Once presence of small mammals has been established along segments of the levee, no further surveys will be required in those segments. If no small mammal species are found utilizing the revegetated slopes within five years of the restoration, DWR will coordinate with USFWS and CDFW to determine an appropriate grassland habitat compensation property to be conserved in perpetuity.	• Coordinate with USFWS and CDFW to prepare a Restoration Plan that identifies an appropriate seed mix for revegetation, hydroseeding methods, monitoring frequency requirements, and habitat performance criteria that will identify the minimum percent cover of restored vegetation along the affected areas. • Coordinate with USFWS and CDFW to determine an appropriate grassland habitat compensation property	DWR	X		
BIO-3: DWR shall have a qualified biologist conduct a preconstruction reconnaissance survey for nesting migratory bird species, burrowing owls, and other nesting birds within 300 feet of the construction limits of each project element to determine and map the location and extent of special-status species occurrence(s) that could be affected by the project.	• Retain a qualified biologist to conduct a preconstruction spring/summer active season reconnaissance survey birds as specified in Mitigation Measure BIO-3.	DWR	X		

DWR PERRIS DAM REMEDIATION PROGRAM MITIGATION MONITORING AND REPORTING PROGRAM (CONTINUED)

Mitigation Measures	Implementation, Monitoring, and Reporting Action	Responsibility	Monitoring Schedule		
			Before Construction	During Construction	After Construction
BIO-4: If potential burrowing owl habitat or signs of owls are found to be present, appropriate protocol surveys must be conducted no more than 1 year prior to project implementation between February 1 and August 31 in accordance with the 2012 CDFW Staff Report on Burrowing Owl Mitigation. Avoidance of burrowing owls during the nesting season shall be required, and if burrowing owls are found outside of the nesting season, either passive or active relocation shall be required in consultation with CDFW. If CDFW determines that burrowing owl relocation is required, a qualified biologist shall prepare a burrowing owl relocation plan for approval by CDFW, and a qualified biologist with the appropriate handling permit shall implement the relocation activities and procedures described in the relocation plan.	• If potential burrowing owl habitat or signs of owls are present, retain a qualified biologist to conduct appropriate protocol surveys no more than 1 year prior to project implementation between February 1 and August 31 in accordance with the 2012 CDFW Staff Report on Burrowing Owl Mitigation. • If burrowing owls are found outside of the nesting season, require passive or active relocation by a qualified biologist in consultation with CDFW. • If CDFW determines that burrowing owl relocation is required, retain a qualified biologist to prepare a burrowing owl relocation plan for approval by CDFW. • Retain a qualified biologist with the appropriate handling permit to implement the relocation activities and procedures described in the relocation plan. • Perform site inspections to verify contractor avoidance of burring owls during the nesting season. Retain inspection records in the project file.	DWR	X	X	
	• Avoid burrowing owls during the nesting season.	Construction Contractor		X	

DWR PERRIS DAM REMEDIATION PROGRAM MITIGATION MONITORING AND REPORTING PROGRAM (CONTINUED)

Mitigation Measures	Implementation, Monitoring, and Reporting Action	Responsibility	Monitoring Schedule		
			Before Construction	During Construction	After Construction
BIO-5: DWR shall avoid direct impacts on any nesting birds located within the limits of construction by removing plant material outside of the typical breeding season (which is February 1 through August 31).	• Avoid direct impacts on any nesting birds located within the limits of construction by removing plant material outside of the typical breeding season (which is February 1 through August 31).	DWR	X		
BIO-6: If construction and vegetation removal is proposed during the bird nesting period (February 1 through August 31) or nests are observed during the preconstruction surveys, then active nest sites located during the preconstruction surveys shall be avoided and a nondisturbance buffer zone established dependent on the species. The type and intensity of buffer will be determined in the field by the qualified biologist. Nest sites shall be avoided with nondisturbance buffer zones until the adults and young are no longer reliant on the nest site for survival, as determined by a qualified biologist.	• If construction and vegetation removal is proposed during the bird nesting period, retain a qualified biologist to determine a nondisturbance buffer zone dependent on the species.	DWR	X		
	• If construction and vegetation removal is proposed during the bird nesting period, then avoid active nest sites located during the preconstruction surveys. • Avoid nest sites with nondisturbance buffer zones until the adults and young are no longer reliant on the nest site for survival, as determined by a qualified biologist.	Construction Contractor		X	
Cultural Resources					
CUL-1: Prior to earthmoving activities, cultural resources sensitivity training shall be presented to all construction personnel. The training will be conducted by a qualified archaeologist (meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology [U.S. Department of the Interior, 2008]), or an archaeologist working under the direction of the qualified archaeologist, along with a Native American representative from a tribe that is culturally and traditionally affiliated with the project area. Construction personnel shall be informed of the types of cultural resources that may be encountered, and, to bring awareness to personnel of actions to be taken in the event of a cultural resources discovery and safety procedures to be followed when working in close proximity to archaeological or tribal monitors. DWR shall ensure that all construction personnel are made available for and attend the training and retain documentation demonstrating attendance.	• Include Mitigation Measure CUL-1 in the construction contract specifications. • Ensure that construction personnel attend the training and retain documentation demonstrating attendance. • Train construction personnel in the identification of cultural resources as specified in Mitigation Measure CUL-1.	DWR	X		
	• Attend the cultural resources training identified in Mitigation Measure CUL-1.	Construction Contractor	X		

DWR PERRIS DAM REMEDIATION PROGRAM MITIGATION MONITORING AND REPORTING PROGRAM (CONTINUED)

Mitigation Measures	Implementation, Monitoring, and Reporting Action	Responsibility	Monitoring Schedule		
			Before Construction	During Construction	After Construction
CUL-2: An archaeological monitor (working under the direct supervision of the qualified archaeologist) shall be present during all ground-disturbing activities related to the project. A Native American representative from a tribe that is culturally and traditionally affiliated with the project area shall be invited to participate in the monitoring effort. Based on observations made by the archaeological and Tribal monitors, monitoring activities may be modified at the recommendation of the qualified archaeologist in coordination with the Tribal Monitor and DWR. Archaeological and Tribal monitors shall have the authority to stop and redirect grading in the immediate area of all discoveries (within 100 feet) until they can be evaluated and appropriate next steps determined in accordance with procedures and protocols outlined in Mitigation Measure CUL-3.	• Ensure an archeological monitor is present during initial ground disturbing activities to assess subsurface conditions as described in Mitigation Measure CUL-2. • Invite a Native American monitor to be present during initial ground-disturbing activities. • Modify monitoring activities as recommended by the qualified archaeologist.	DWR	X	X	
	• Coordinate with DWR to ensure an archaeological monitor and potentially a Native American monitor are present during initial ground disturbing activities.	Construction Contractor	X	X	
CUL-3: In the event of the unanticipated discovery of archaeological materials, DWR shall immediately cease all work activities in the area (within approximately 100 feet) of the discovery until it can be evaluated by the qualified archaeologist, in coordination with appropriate Native American representatives who are culturally and traditionally affiliated with the project area, and DWR. Cultural and archaeological resources are inadvertent discoveries when they were not anticipated to be found during the project's activities. This may include previously unknown sacred sites and items, midden deposits, artifacts, hearths, bedrock outcrops, human remains and other resources, etc. Historic-period materials might include stone or concrete footings and walls; filled wells or privies; and deposits of metal, glass, and/or ceramic refuse. Construction shall not resume until the qualified archaeologist has conferred with DWR on the significance of the resource.	• If a discovered archaeological resource constitutes a historical resource under CEQA, avoidance and preservation in place is preferred. If data recovery through excavation is the only feasible mitigation available, retain and consult with a qualified archaeologist to prepare a Cultural Resources Treatment Plan as specified in mitigation Measure CUL-3. • Consult with appropriate Native American representatives in determining treatment for prehistoric or Native American resources.	DWR		X	

DWR PERRIS DAM REMEDIATION PROGRAM MITIGATION MONITORING AND REPORTING PROGRAM (CONTINUED)

Mitigation Measures	Implementation, Monitoring, and Reporting Action	Responsibility	Monitoring Schedule		
			Before Construction	During Construction	After Construction
Consistent with California Public Resources Code Section 21083.2(b), avoidance and preservation in place shall be the preferred method of treatment for archaeological resources that meet the criteria for historical resources (CEQA Guidelines Section 15064.5(a)) and/or unique archaeological resources (California Public Resources Code Section 21083.2(g)). Preservation in place maintains the important relationship between artifacts and their archaeological and cultural context and also serves to avoid conflict with traditional and religious values of groups who may ascribe meaning to the resource. Preservation in place may be accomplished by, but is not limited to, avoidance, incorporating the resource into open space, or deeding the site into a permanent conservation easement. In the event that preservation in place is demonstrated to be infeasible and data recovery through excavation is the only feasible mitigation available, as agreed upon by the qualified archaeologist, Native American representative(s), and DWR, a Cultural Resources Treatment Plan shall be prepared and implemented by a qualified archaeologist in consultation with Native American representative(s) and DWR that provides for the adequate recovery of the archaeological resource and accounts for any tribal concerns as expressed in the consultation process described above. DWR shall consult with appropriate Native American representatives in determining treatment only for prehistoric or Native American resources.	• In the event of the unanticipated discovery of archaeological materials, immediately cease all work activities in the area as specified in Mitigation Measure CUL-3. Do not resume construction until the qualified archaeologist has conferred with DWR on the significance of the resource.	Construction Contractor		X	

DWR PERRIS DAM REMEDIATION PROGRAM MITIGATION MONITORING AND REPORTING PROGRAM (CONTINUED)

Mitigation Measures	Implementation, Monitoring, and Reporting Action	Responsibility	Monitoring Schedule		
			Before Construction	During Construction	After Construction
CUL-4: The qualified archaeologist shall prepare a final archaeological monitoring report within sixty (60) days of completion of the monitoring of ground disturbing activities related to the project. The report shall follow Archaeological Resource Management Reports: Recommended Contents and Format guidelines and DWR requirements and shall include at a minimum: a discussion of the monitoring methods and techniques used; the results of the monitoring program, including any artifacts recovered; an inventory of any resources recovered; California Department of Parks and Recreation (DPR) 523 forms for identified resources; notation of the final disposition of the resources; and any additional recommendations. A final copy shall be submitted to DWR, the Eastern Information Center (EIC), the Pechanga Tribe, and any other Native American group who requests a copy.	• Obtain a qualified archaeologist to prepare a final archaeological monitoring report. • Send a copy of the report to Native American groups upon request. • Retain the report in project file.	DWR		X	
CUL-5: All cultural materials collected during the monitoring program, and testing and/or data recovery of identified resources, excluding sacred items, burial goods and human remains the treatment of which would be determined by the Most Likely Descendant in coordination with the landowner (as prescribed in CUL-7 and in accordance with state laws), shall be curated at a facility that meets the curation standards set forth in 36 Code of Federal Regulations Part 79, as determined by DWR in consultation the qualified archaeologist and appropriate Native American representatives.	• Send all collected cultural materials from the monitoring program to a facility that meets the curation standards set forth in 36 Code of Federal Regulations Part 79. • Consult with qualified archaeologist and appropriate Native American representative to find appropriate facility.	DWR		X	
CUL-6: During ground excavation greater than 5 feet, construction activities will be monitored for paleontological resources. DWR shall retain a qualified paleontologist to oversee the monitoring effort and determine the appropriate duration of monitoring needed. In the event of the discovery of fossils or fossil-bearing soils during construction of the project, the	• During ground excavation greater than 5 feet, retain a qualified paleontologist to determine the appropriate duration of monitoring needed and oversee monitoring of construction activities for paleontological resources.	DWR	X		

DWR PERRIS DAM REMEDIATION PROGRAM MITIGATION MONITORING AND REPORTING PROGRAM (CONTINUED)

Mitigation Measures	Implementation, Monitoring, and Reporting Action	Responsibility	Monitoring Schedule: Before Construction	Monitoring Schedule: During Construction	Monitoring Schedule: After Construction
contractor shall immediately report the finding to DWR. The qualified paleontologist will evaluate the finding and establish further collection and monitoring protocols. Construction in the vicinity of the finding will be halted until the qualified paleontologist has evaluated the finding..	• In the event of the discovery of fossils or fossil-bearing soils during construction of the project, immediately report the finding to DWR. Halt construction in the vicinity of the finding until DWR's retained qualified paleontologist has evaluated the finding and established further collection and monitoring protocols.	Construction Contractor		X	
CUL-7: If human remains are encountered, consistent with California Health and Safety Code Section 7050.5, DWR shall immediately halt work within 100 feet of the discovery and contact the Riverside County Coroner. No further disturbance shall occur within 100 feet of the discovery until the Riverside County Coroner has made the necessary findings as to origin of the remains. Further, consistent with California Public Resources Code Section 5097.98(b), human remains shall be left in place and free from disturbance until a final decision as to the treatment and disposition has been made. Any further project-related activities shall take into account the possibility of multiple burials. If the Riverside County Coroner determines the remains to be Native American, the Native American Heritage Commission shall be contacted within twenty-four (24) hours. The Native American Heritage Commission shall immediately identify the Most Likely Descendant(s) and notify them of the discovery. The Most Likely Descendant(s) shall make recommendations within forty-eight (48) hours of being granted access to the site, and engage in consultations with the landowner concerning the treatment of the remains, as provided in Public Resources Code Section 5097.98.	• In the event of the discovery of human remains during construction of the project, immediately report the finding to DWR. Halt construction in the vicinity of the finding until the Riverside County Coroner has arrived. • In the event that the remains are determined to be Native American, the Native American Heritage Commission shall be contacted within 24 hours.	DWR		X	
Energy					
No mitigation required.					

DWR PERRIS DAM REMEDIATION PROGRAM MITIGATION MONITORING AND REPORTING PROGRAM (CONTINUED)

Mitigation Measures	Implementation, Monitoring, and Reporting Action	Responsibility	Monitoring Schedule		
			Before Construction	During Construction	After Construction
Geology, Soils, and Mineral Resources					
No mitigation required.					
Hazards and Hazardous Materials					
HAZ-1: DWR shall coordinate with California State Parks and Lake Perris Fairgrounds management personnel to develop a site safety plan for the construction activities. The plan would identify construction zone access including fencing and gate control, routine patrolling, and signage.	• Coordinate with California State Parks and Lake Perris Fairgrounds management personnel to develop a site safety plan for the construction activities.	DWR	X		
Hydrology and Water Quality					
No mitigation required.					
Land Use and Planning / Agriculture and Forestry Resources					
Implement Mitigation Measure BIO-2a (see above).					
Noise					
NOISE-1: Nighttime work shall not include blasting or sheet pile driving.	• Include Mitigation Measure NOISE-1 in the construction contract specification. • Perform site inspections to verify contractor compliance with nighttime work limitations. Retain inspection records in the project file.	DWR	X	X	
	• Do not include blasting or sheet pile driving during nighttime work.	Construction Contractor		X	
NOISE-2: In coordination with DPR at Lake Perris SRA, construction contractors shall implement the following: • Signs shall be posted at the construction sites that include permitted construction days and hours, a day and evening contact number for the job site, and a contact number in the event of problems.	• Include Mitigation Measure NOISE-2 in the construction contract specification. • Perform site inspections to verify contractor compliance with sign postage and response to complaints and questions. Retain inspection records in the project file.	DWR	X	X	

DWR PERRIS DAM REMEDIATION PROGRAM MITIGATION MONITORING AND REPORTING PROGRAM (CONTINUED)

Mitigation Measures	Implementation, Monitoring, and Reporting Action	Responsibility	Monitoring Schedule		
			Before Construction	During Construction	After Construction
• An on-site complaint and enforcement manager shall respond to and track complaints and questions related to noise.	• Post signs at the construction sites that include permitted construction days and hours, a day and evening contact number for the job site, and a contact number in the event of problems. • Designate an on-site compliance and enforcement manager to respond and track complains and questions related to noise.	Construction Contractor		X	
NOISE-3: To reduce noise impacts due to construction, DWR shall require construction contractors to implement the following measures: • During construction, the contractor shall outfit all equipment, fixed or mobile, with properly operating and maintained exhaust and intake mufflers, consistent with manufacturers' standards. • Impact tools (e.g., jack hammers, pavement breakers, and rock drills) used for construction shall be hydraulically or electrically powered wherever possible to avoid noise associated with compressed air exhaust from pneumatically powered tools. Where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used. External jackets on the tools themselves shall be used where feasible. Quieter procedures, such as use of drills rather than impact tools, shall be used whenever feasible. • Stationary noise sources that could affect adjacent receptors shall be located as far from adjacent receptors as possible. • Daytime construction activities would be limited to the times of 7:00 a.m. and 7:00 p.m. • Residents and park visitors shall be notified in advance of the night work schedule.	• Include Mitigation Measure NOISE-3 in the construction contract specification. • Perform site inspections to verify contractor compliance. Retain inspection records in the project file.	DWR	X	X	
	• Outfit all equipment, fixed or mobile, with properly operating and maintained exhaust and intake mufflers, consistent with manufacturers' standards. • Hydraulically or electrically power impact tools wherever possible to avoid noise associated with compressed air exhaust from pneumatically powered tools. Where use of pneumatic tools is unavoidable, use an exhaust muffler on the compressed air exhaust. Use external jackets on the tools themselves where feasible. Use quieter procedures, such as drills rather than impact tools, whenever feasible. • Locate stationary noise sources that could affect adjacent receptors shall be located as far from adjacent receptors as possible. • Limit daytime construction activities to 7:00 a.m. and 7:00 p.m.	Construction Contractor		X	

DWR PERRIS DAM REMEDIATION PROGRAM MITIGATION MONITORING AND REPORTING PROGRAM (CONTINUED)

Mitigation Measures	Implementation, Monitoring, and Reporting Action	Responsibility	Monitoring Schedule		
			Before Construction	During Construction	After Construction
	• Notify residents and park visitors in advance of the night work schedule				
NOISE-4: A Blasting Plan for construction shall be prepared and followed that includes the following: • Primary components of the Blasting Plan shall include: – Identification of blast officer; – Scaled drawings of blast locations, and neighboring buildings, streets, or other locations which could be inhabited; – Blasting notification procedures, lead times, and list of those notified. Public notification to potentially affected vibration and nuisance noise receptors describing the expected extent and duration of the blasting; – Description of means for transportation and on-site storage and security of explosives in accordance with local, state and federal regulations; – Minimum acceptable weather conditions for blasting and safety provisions for potential stray current (if electric detonation); – Traffic control standards and traffic safety measures (if applicable); – Required personal protective equipment; – Minimum standoff distances and description of blast impact zones and procedures for clearing and controlling access to blast danger; – Procedures for handling, setting, wiring, and firing explosives; and procedures for handling misfires per Federal code; – Type and quantity of explosives and description of detonation device. • Sequence and schedule of blasting rounds, including general method of excavation, lift heights, etc.;	• Include Mitigation Measure NOISE-4 in the construction contract specification. • Perform site inspections to verify contractor compliance with the blasting plan. Retain inspection records in the project file.	DWR	X	X	
	• Blasting rounds shall be sequenced and scheduled as specified in Mitigation Measure NOISE-4. • Prepare a sound attenuation plan outlining sound control measures that would include the use of blasting mats or sound walls. • If vibration results in damage to any nearby structures or utilities, or scenic rock faces, immediately cease blasting. Monitor the stability of segmental retaining walls, existing slopes, creek canals, etc. Any evidence of instability due to blasting operations shall result in immediate termination of blasting. • Ensure explosive materials delivery and transportation shall meet the requirements specified in Mitigation Measure NOISE-4. • Comply with U.S. Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) table-of-distance requirements as specified in NOISE-4. • Provide 24-hour security and/or the use of motion-detector and alarmed double wire fencing security measures around the stored explosives.	Construction Contractor	X	X	

DWR PERRIS DAM REMEDIATION PROGRAM MITIGATION MONITORING AND REPORTING PROGRAM (CONTINUED)

Mitigation Measures	Implementation, Monitoring, and Reporting Action	Responsibility	Monitoring Schedule		
			Before Construction	During Construction	After Construction
– Methods of matting or covering of blast area to prevent flyrock and excessive air blast pressure; – Description of blast vibration and air blast monitoring programs; – Dust control measures in compliance with applicable air pollution control regulations (to interface with general construction dust control plan); – Emergency Action Plan to provide emergency telephone numbers and directions to medical facilities. Procedures for action in the event of injury; – Material Safety Data Sheets for each explosive or other hazardous materials to be used; – Evidence of licensing, experience, and qualifications of blasters; – Description of insurance for the blasting work. • A sound attenuation plan shall be prepared outlining sound control measures that would include the use of blasting mats or sound walls. • If vibration results in damage to any nearby structures or utilities, or scenic rock faces, blasting shall immediately cease. The stability of segmental retaining walls, existing slopes, creek canals, etc. shall be monitored and any evidence of instability due to blasting operations shall result in immediate termination of blasting. • Explosive materials shall be delivered in specially built vehicles marked with United • Nations (UN) hazardous materials placards. Explosives and detonators shall be delivered in separate vehicles or be separated in compartments meeting DOT rules within the same vehicle. Vehicles shall have at least two ten-pound Class-A fire extinguishers and all sides of the vehicles display placards displaying the UN Standard hazard code for the onboard explosive materials. Drivers shall have commercial driver					

DWR PERRIS DAM REMEDIATION PROGRAM MITIGATION MONITORING AND REPORTING PROGRAM (CONTINUED)

Mitigation Measures	Implementation, Monitoring, and Reporting Action	Responsibility	Monitoring Schedule: Before Construction	Monitoring Schedule: During Construction	Monitoring Schedule: After Construction
licenses (CDL) with Hazmat endorsements, and drivers shall carry bill-of-lading papers detailing the exact quantities and code dates of transported explosives or detonators. • The contractor must comply with U.S. Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) table-of-distance requirements (CFR 27, U.S. Department of Justice, Alcohol, Tobacco, Firearms and Explosives Division Part 555) that restrict explosive quantities based on distance from occupied buildings and public roadways. Employees must also comply with the security requirements of the Safe Explosives Act (Title XI, Subtitle C of Public Law 107-296, Interim Final Rule), implemented in March 2003. These requirements require background checks for all persons that use, handle or have access to explosive materials; and responsible persons on a now required federal explosives license must submit photographs and fingerprints with the application to ATF. • The contractor shall provide 24-hour security and/or the use of motion-detector and alarmed double wire fencing security measures around the stored explosives.					
Public Services, Utilities, and Service Systems					
UTIL-1: DWR shall create a temporary emergency access road for use only by emergency responders on an as-needed basis. This road would connect Evans Road and Lake Perris Drive during full closure (Option B) of the bridge construction at Evans Road. If Option B is chosen, DWR shall provide the location of the temporary road to appropriate emergency responders within the local area prior to the start of construction activities.	• Create a temporary emergency access road for use only by emergency responders on an as-needed basis as described in Mitigation Measure UTIL-1. • If Option B is chosen, provide the location of the temporary road to appropriate emergency responders within the local area.	DWR		X	
UTIL-2: During design and prior to construction, an underground utilities search will be conducted to compile available information on utility locations.	• During design and prior to construction, conduct an underground utilities search to compile available information on utility locations.	DWR	X		

DWR PERRIS DAM REMEDIATION PROGRAM MITIGATION MONITORING AND REPORTING PROGRAM (CONTINUED)

Mitigation Measures	Implementation, Monitoring, and Reporting Action	Responsibility	Monitoring Schedule		
			Before Construction	During Construction	After Construction
Recreation					
No mitigation required.					
Transportation and Traffic					
TRANS-1: For proposed bridge construction at Evans Road (Option A or Option B), DWR shall implement the following measures for each designated intersection. 1. *Perris Boulevard and Iris Avenue* Create a new northbound right-turn overlap phase; change westbound, northbound, and southbound left-turn phasing to protected-permissive. 2. *Lasselle Street and Iris Avenue* At all approaches, change left-turn phases to protective-permissive. 3. *Perris Boulevard and Krameria Avenue* Restripe westbound approach to provide two left-turn lanes and a shared thru-right lane. Change westbound left-turn phase to protective permissive with eastbound phase remaining as permissive. 4. *Lasselle Street and Krameria Avenue* At all approaches, change left-turn phased to protected-permissive. 7. *Perris Boulevard and Harley Knox Boulevard* At northbound, southbound, and eastbound approaches, change left-turn phases to protected-permissive. 10. *Perris Boulevard and Ramona Expressway* At all approaches, change left-turn phasing to protected-permissive. Restripe northbound lanes to provide two left-turn lanes, two thru-lanes and one shared thru-right lane.	• Include the design features described in Mitigation Measure TRANS-1 for each designated intersection.	DWR	X		

DWR PERRIS DAM REMEDIATION PROGRAM MITIGATION MONITORING AND REPORTING PROGRAM (CONTINUED)

Mitigation Measures	Implementation, Monitoring, and Reporting Action	Responsibility	Monitoring Schedule		
			Before Construction	During Construction	After Construction
11. *Redlands Avenue and Ramona Expressway (Option B only)* At southbound and east bound approaches, change left-turn phase to protected-permissive. At northbound and southbound approaches change right-turn phase to permissive-overlap.					