

O.6.3 Regional Agency Comments

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Riverside County Fire Department

In Cooperation With
The California Department of Forestry and Fire Protection

R-1

John R. Hawkins ~ Fire Chief

210 West San Jacinto Avenue ~ Perris, CA 92570
(951) 940-6900 ~ www.rvcfire.org

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June 28, 2011

Mr. Aaron Burton
Senior Environmental Planner
Environmental Studies "B"
Department of Transportation
464 West 4th Street, 6th Floor
San Bernardino, CA 92401-1400

RE: RCFD comments regarding the Draft EIR/EIS for the SR 91 Corridor Improvement Project

Mr. Burton,

Per your written public notice for a public hearing for review and commentary regarding the Draft EIR/EIS for the above referenced project, RCFD offers the below comments specific to impacts to fire and emergency services:

The RCFD has reviewed the Project for that portion existing within Riverside County and agrees with the findings of the Final Initial Study that no significant impacts to Public Services are posed. Specifically, RCFD agrees with the finding of "Less Than Significant" for Fire Protection. RCFD agrees with those findings that movement along the corridor will be improved and that emergency response efforts will benefit from that improved mobility. Further, RCFD agrees with findings that wildland fire dangers will be further minimized as the increased expanse of the freeway only improves as a buffer. Lastly, RCFD agrees with findings that mitigation efforts for mobility impacts during construction have been adequately addressed to reach a level of "less than significant".

If I can be of further assistance, please contact me at 951.940.6308 or ben.johnson@fire.ca.gov.

Thank you,

Ben R. Johnson, AICP
Planning & Development Supervisor
Strategic Planning Bureau

R-1-

R-1-1

No response is necessary because this comment does not ask a question or provide a comment relative to the technical information or the environmental analyses in the EIR/EIS.

This comment from the RCFD supports the conclusion presented in the Draft EIR/EIS that the SR-91 CIP would not result in significant impacts related to fire protection. Since the circulation of the Draft EIR/EIS, the following have occurred that may reduce potential fire threats:

1. The approved Biological Opinion (November 30, 2011) includes General Conservation Measure No. 3, which requires the Department and RCTC to work with USFWS to investigate the possibility of adding features such as concrete walls, k-rails, or other hardscape barriers along SR-91 in the vicinity of the Coal Canyon wildlife crossing to address potential fire threats.
2. Measure UES-4, which would provide a continuous 30- to 36-inch-high barrier on the shoulder on both the westbound and eastbound sides of SR-91 generally between SR-71 and SR-91 was added to the EIR/EIS. Refer to Section O.5.5.6, Measures for Other Effects at Chino Hills State Park, on page O-25 for the specific language of Measure UES-4.

**MWD**

METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

R-2

June 15, 2011

Via Electronic & U.S. Mail

Mr. Aaron Burton
California Department of Transportation, District 8
Environmental Planning
464 W. 4th Street, Mail Station 1162
San Bernardino, California 92401

Dear Mr. Burton:

Notice of Public Hearing and Notice of Availability of the
Draft Environmental Impact Report / Environmental Impact Statement
for the State Route 91 (SR-91) Corridor Improvement Project

The Metropolitan Water District of Southern California (Metropolitan) has received the Notice of Public Hearing and Notice of Availability of the Draft Environmental Impact Report / Environmental Impact Statement for the State Route 91 (SR-91) Corridor Improvement Project (Project), and is pleased to provide comments as a potentially affected agency. The Project proposes to widen a 14-mile stretch of the SR-91 between the State Route 241 Toll Road (SR-241) interchange in Yorba Linda to the Pierce Street interchange in the City of Riverside. The Project also proposes to widen a 6-mile stretch of Interstate 15 (I-15) between the Cajalco Road interchange in the City of Corona and the Hidden Valley Parkway interchange in the Cities of Corona and Norco.

R-2-1

We have reviewed the Project description and have determined that the Lower Feeder pipeline, owned and operated by Metropolitan, is within the Project area. More specifically, the Lower Feeder pipeline intersects the Project's boundaries at two locations (see enclosed maps). The first location is at the South Weir Canyon Road intersection with SR-91 and is a 109-inch-inside-diameter welded steel pipeline. The second location is just south of the El Cerrito Road intersection with the I-15 and is a 108-inch-inside-diameter precast concrete pipeline.

R-2-2

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. Approval of the Project should be contingent upon Metropolitan's approval of design plans for portions of the Project that could impact our facilities.

Mr. Aaron Burton
Page 2
May 25, 2011

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 Easement of The Metropolitan Water District of Southern California."

R-2-3

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

R-2-4

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 plans and documentation for this project. If I can be of further assistance, please contact me at (213) 217- 6409.

R-2-5

Very truly yours,



Deirdre West
Team Manager, Environmental Planning Team

RM/rm
Enclosure: Maps

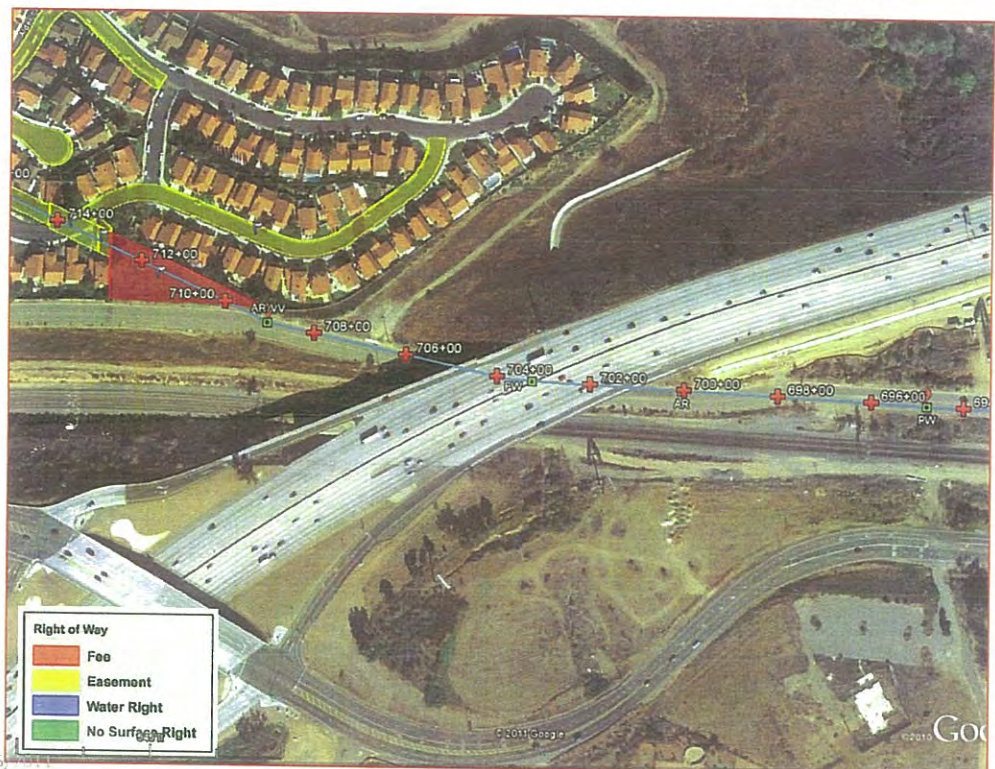
Note: Pages 3 to 26 of this comment letter, which are facilities maps and guidelines, are provided in Attachment 3, Metropolitan Water District Comment Letter Attachments

SR-91 CORRIDOR IMPROVEMENT PROJECT:
View Showing Project Boundaries and the Lower Feeder Pipeline



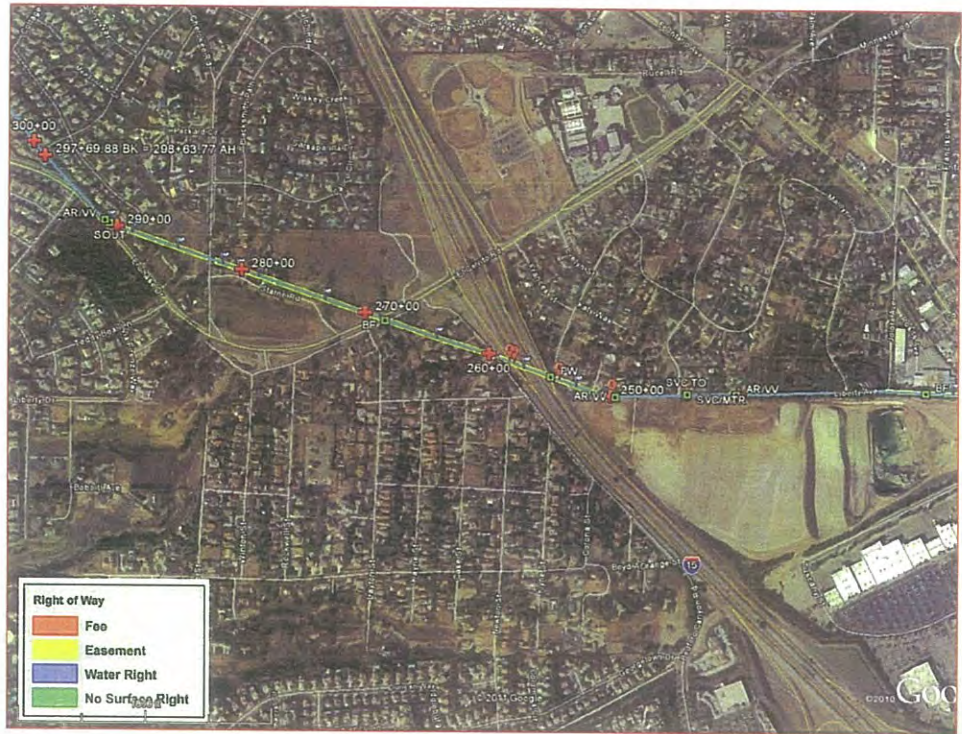
6/15/2011

SR-91 CORRIDOR IMPROVEMENT PROJECT:
View Showing the SR-91 Intersecting the MWD Lower Feeder Pipeline at South Weir Canyon Road



6/15/2011

SR-91 CORRIDOR IMPROVEMENT PROJECT:
View Showing the I-15 Intersecting the MWD Lower Feeder Pipeline at Liberty Avenue



6/15/2011

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 alignment 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 alignment 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 assist 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.

1. 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 Morenci 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).

c. 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.

d. 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 be 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 Pipeline, and 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

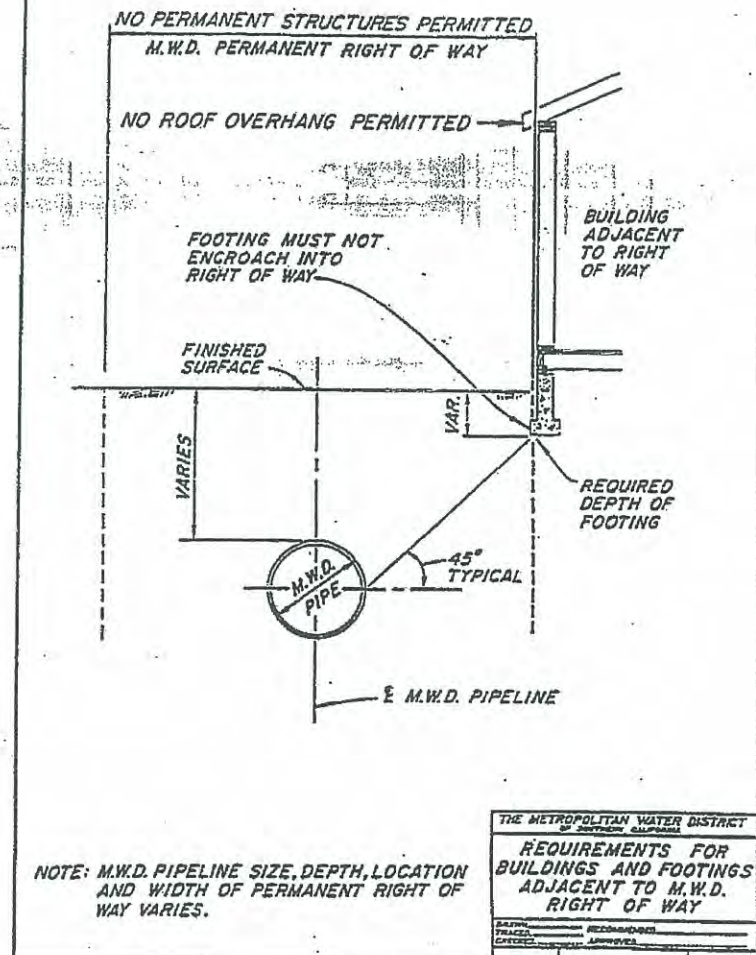
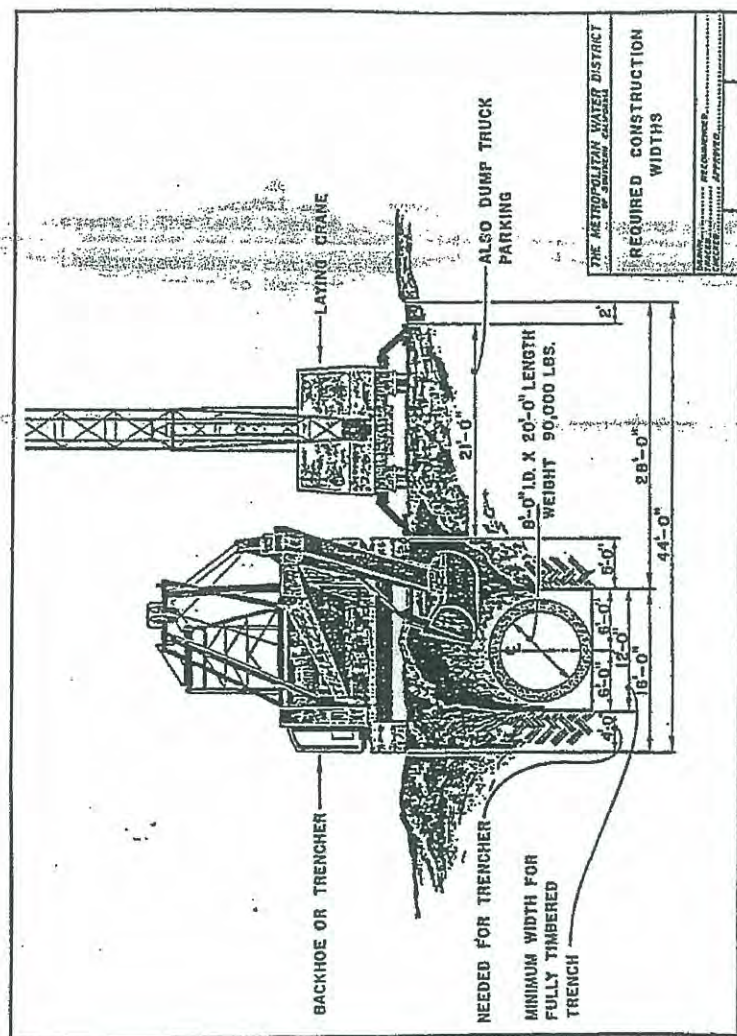
Should you require additional information, please contact:

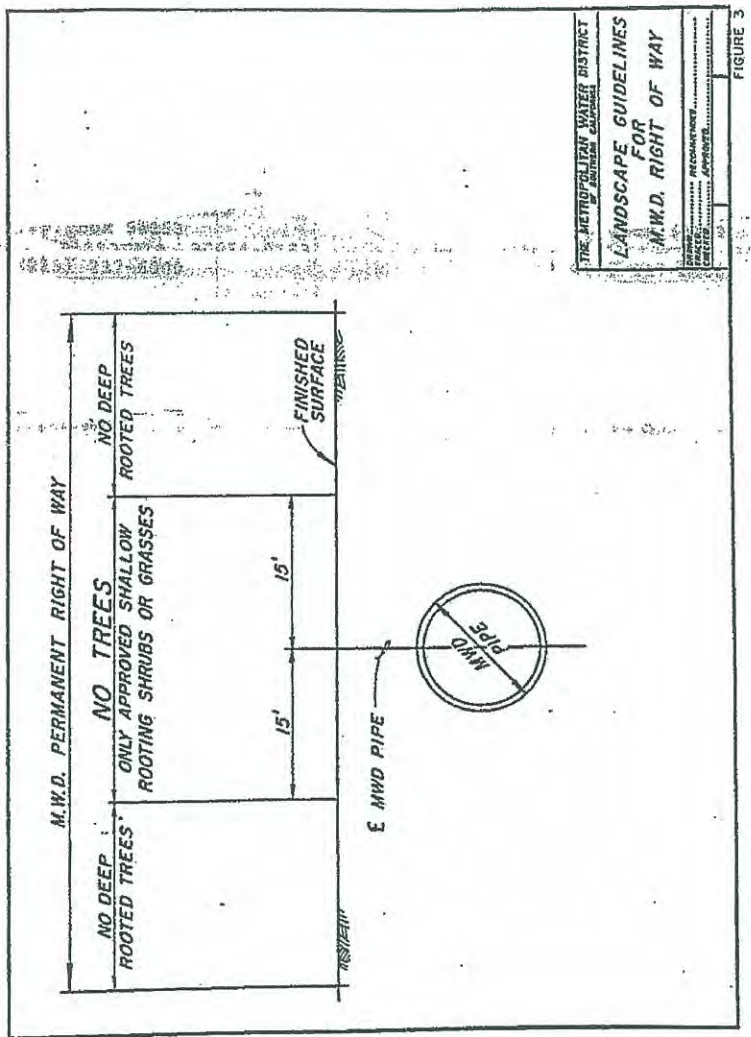
Civil Engineering Substructures Section
Metropolitan Water District
of Southern California
P.O. Box 54153
Los Angeles, California 90054-0153
(213) 217-6000

JEH/MRW/lk

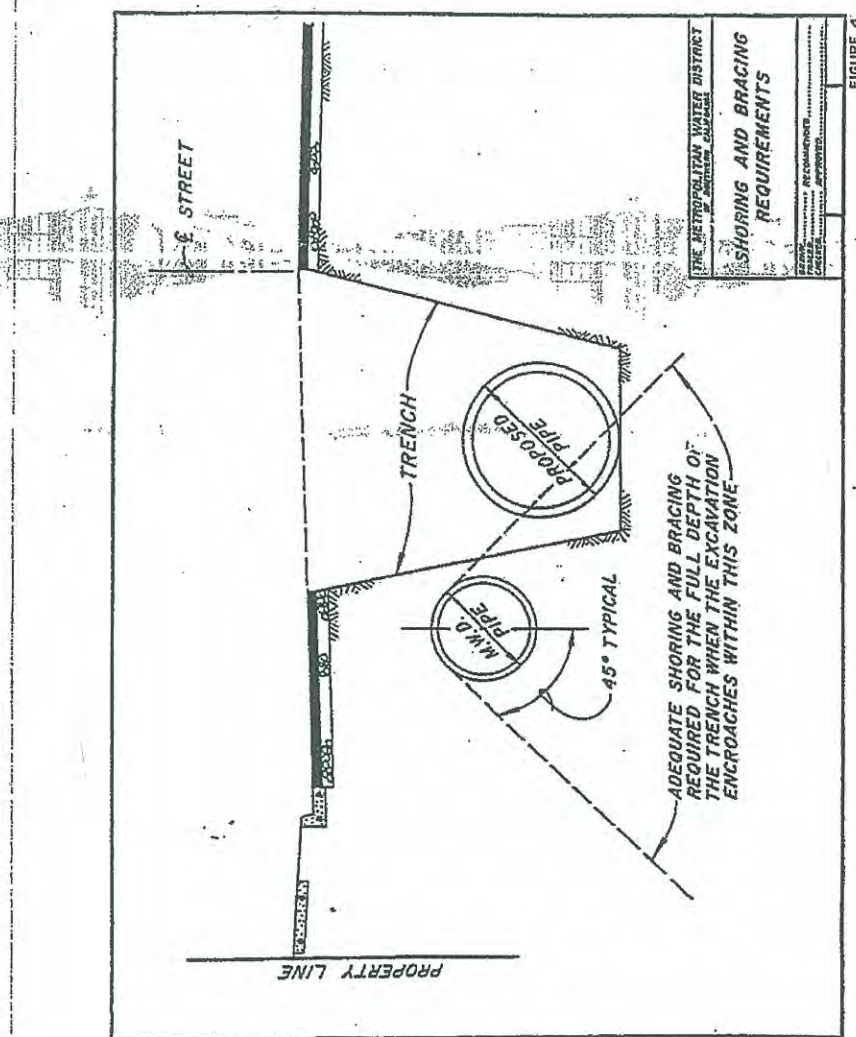
Rev. January 22, 1989

Encl.





FROM MAP 15-5 (NOV 83) 45' R. 45' W. 30' W. 30' W.



FROM MAP 15-5 (NOV 83) 45' R. 45' W. 30' W. 30' W.

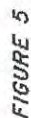
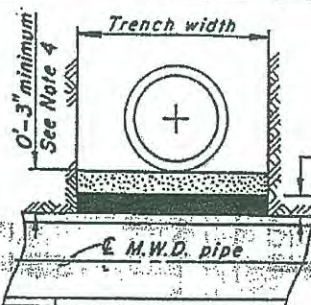
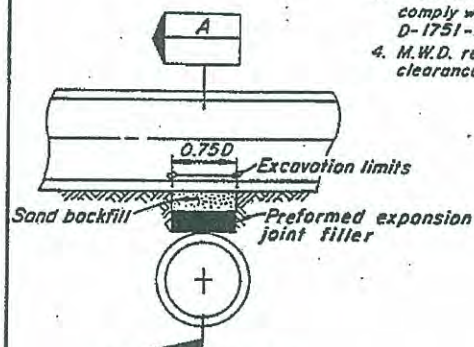


FIGURE 5





SECTION A



CROSS SECTION

NOTES

1. This method to be used where the utility line is 24" or greater in diameter and the clearance between the utility line and M.W.D. pipe is 12" or less.
2. Special protection may be required if the utility line diameter is greater than M.W.D. pipe or if the cover over the utility line to the street surface is minimal and there is 12" or less clearance between M.W.D. pipe and the utility line.
3. Preformed expansion joint filler to comply with ASTM designation D-1751-73.
4. M.W.D. requests 12" minimum clearance whenever possible.

THE METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA	
TYPICAL EXPANSION JOINT FILLER PROTECTION FOR OVERCROSSING OF M.W.D. PIPELINE	
DESIGNED BY	DESIGNED BY
TRACED BY	TRACED BY
CHECKED BY	CHECKED BY
C-11632	

R-2-1

No response is necessary because this comment does not ask a question or provide a comment relative to the technical information or the environmental analyses in the EIR/EIS.

R-2-2

As part of the preliminary engineering effort conducted for preparation of the *Project Report* and the EIR/EIS, the RCTC obtained as-built drawings of the Metropolitan facilities (Metropolitan Lower Feeder Pipeline) within the SR-91 CIP limits. The two locations cited in this letter (crossing SR-91 adjacent to Prado Road and crossing I-15 near El Cerrito Road as shown on the maps provided by Metropolitan and included in Attachment 1) are shown on the preliminary engineering drawings for the SR-91 CIP. Based on RCTC's preliminary investigation, the Metropolitan facilities are not directly impacted by the proposed SR-91 CIP improvements. Relocation of those facilities is not anticipated as a result of the SR-91 CIP.

During the design-build phase of the project, it will be necessary to coordinate with and obtain clearance letters from Metropolitan. The Project Construction Manager, RCTC, and/or their designated representatives will contact Metropolitan as requested and provide appropriate project information and final design plans of the two locations where the Lower Feeder Pipeline crosses SR-91 and I-15.

R-2-3

It is acknowledged that, if necessary because Metropolitan facilities are in or immediately adjacent to the project limits, the Guidelines for Developments in the Area of Facilities, Fee Properties, and/or Easements of the Metropolitan Water District of Southern California, included in Attachment 1, would be referred to during the design/build phase of the project. Refer also to response to comment R-2-2, above.

R-2-4

Although not required as mitigation for any project related effects, the project design will consider incorporation of drought tolerant plant materials and the use of reclaimed water for irrigation in the project as appropriate, based on the project landscaping and revegetation requirements. The other measures cited in this comment would likely not be incorporated in the project design because the project does not propose any uses that would support groundwater recharge and, with the exception of irrigation fixtures, would not use any other types of fixtures.

The City of Corona has already actively implemented many of these measures throughout the project limits, including the use of reclaimed water, installation of drought-tolerant landscaping, and water wells.

R-2-5

As noted above, if during the design-build phase of the project, it is necessary to obtain information from Metropolitan, the Project Construction Manager, RCTC, and/or their designated representatives will contact Metropolitan as requested and appropriate project information and design plans would be provided to Metropolitan at that time. Any project design plans submitted to Metropolitan will properly identify all Metropolitan facilities and rights-of-way within and immediately adjacent to the project disturbance/right-of-way limits.

R-3

NCL 11-015

June 21, 2011

Mr. Aaron Burton
Caltrans District 8
464 West Fourth Street, Sixth Floor
San Bernardino, California 925401

SUBJECT: Draft Environmental Impact Report/Environmental Impact Statement
Available for Route 91

Dear Mr. Burton:

The County of Orange has reviewed the Draft Environmental Impact Report/Environmental Impact Statement Available for Route 91 located in the City of Corona and offers the following comments:

Flood/SAR/Trails

The Santa Ana River Regional Riding and Hiking (dirt) Trail and the Santa Ana River Regional Class I (paved, off-road) Bikeway are planned to parallel portions of the project from Gypsum Canyon Road to just east of the Corona Expressway. Trails are used by walkers, joggers, hikers, mountain bicyclists and equestrian riders. Bikeways are used mostly by commuter and recreational cyclists and pedestrians. Trails provide important recreational opportunities often connecting to other regional and local trails. Similarly Class I Bikeways are planned as part of a large network of interconnecting routes that join residential, business, commercial and institutional destinations. The Santa Ana River Trail and the Bikeway were designed as National Recreational Trails in 1976 by the Secretary of the Interior.

The Trail and Bikeway are aligned along the north side of SR-91 from Gypsum Canyon Road to a point just upstream of the new entrance bridge to the Green River Golf Club. Existing and proposed lengths of the trail and bikeway will parallel portions of freeway right-of-way from Gypsum Canyon Road to the entrance to the golf club and to a point above Prado Dam.

R-3-1

The master-planned Santa Ana River Regional Riding and Hiking Trail is built and open from Pacific Coast Highway upstream to Gypsum Canyon Road. The County of Orange is currently working on Phase II of its Santa Ana River Parkway project to extend the Trail from Gypsum Canyon Road to the County boundary to eventually connect with future upstream lengths of this route in Riverside County. The Santa Ana River Class I Bikeway is complete from Pacific Coast Highway to the County boundary. It is possible that the Class I Bikeway may continue east of the County boundary on the south side of the river under the Corona Expressway (SR-71) to a point above Prado Dam.

The Counties of Orange, Riverside and San Bernardino along with SAWPA, The Wildlands Conservancy and each of the Santa Ana River-adjointing cities are working together to complete the Trail and the Bikeway from Orange County to the foothills of the San Bernardino Mountains. The combined effort is known as the Santa Ana River Parkway Partnership. This multi-year effort has the additional cooperation of the U.S. Army Corps of Engineer's and the State of California.

As the highway widening project moves forward the County requests that CalTrans accommodate the Trail and the Bikeway, as necessary, to insure that these important regional routes can be fully implemented.

Should you need additional information please contact Jeff Dickman at (714) 834-2774.

Flood Programs/SAR

Thank you for the opportunity to comment on the above referenced document. OC Public Works/Flood Control Section/Santa Ana River Unit has reviewed the SR-91 Corridor Improvement Project Draft EIR/EIS and offers the following comments:

1. Plan Sheets 2 thru 8 of Appendix L (Project Features) do not show the Right-of-Way Relinquishments from Caltrans to Orange County Flood Control District (OCFCD) for the SARI Line Project. The mentioned right-of-way transfer was approved by the California Transportation Commission on May 20, 2010.
2. Plan Sheets 8 thru 11 of Appendix L (Project Features) do not show the proposed Right-of-Way Relinquishment from Caltrans to OCFCD for the Santa Ana River Reach 9 Phase 2B Project (SAR R9Ph2B Project) bank protection sponsored by the US Army Corps of Engineers (Corps). This right-of-way just south of the Green River Golf Club is anticipated to be relinquished by Caltrans to OCFCD once the right-of-way requirements for the SR-91 widening are established.

R-3-1

R-3-2

R-3-3

3. Plan Sheets 8 thru 10 of Appendix L2 (Project Features) show Temporary Construction Easement (TCE) areas for the proposed CIP Project which may conflict with the improvements currently being constructed on OCFCD's Green River Golf Club (GRGC) property as part of the SAR R9Ph2B Project. It is unclear what impacts, if any, the CIP construction activities within these TCE areas will have on the SAR R9Ph2B Project improvements and/or on the GRGC property and its golf business operations. We recommend that subsequent plans or exhibits show the SAR R9Ph2B Project improvements so that any potential impacts to this project can be more easily evaluated. As far as acquisition of any temporary and/or permanent rights from the GRGC property may be concerned, OCFCD staff are available to meet and further discuss this issue once Caltrans and/or the City of Corona are ready.

R-3-4

4. Plan Sheet 10 of Alternative 2 appears to show a proposed retaining wall on the south slope of the SAR R9Ph2B levee. Please clarify the purpose of this retaining wall. Any structural modification to the SAR R9Ph2B levee needs to obtain approval from the Corps and OCFCD.

R-3-5

5. The last paragraph of page 2-21 indicates that the "centerline of SR-91 is proposed to be shifted so that all of the widening would occur on the north side of SR-91..." This shift would potentially impact the GRGC property and/or its business operations. Please note that OCFCD intends to continue operating the golf course; thus, construction of SR-91 CIP needs coordination with the GRGC management to minimize any impacts. Further, it is unclear whether the centerline shown on Sheets 8 thru 10 is the existing centerline or the shifted centerline. The mentioned plan sheets should show existing/proposed centerline and the control line on the south side of the freeway. A cross-section of this segment also needs to be included in future plans and exhibits to show the impact of the SR-91 CIP Project on the GRGC and the Green River Road.

R-3-6

R-3-7

6. Auxiliary Dike improvements at Prado Dam sponsored by the Corps are currently under construction. This project is located just east of Prado Dam on Auto Center Drive. Please note that, due to its proximity to the SR-91 CIP Project, there may be potential impacts to this project as far construction traffic is concerned. The estimated completion of this project is end of 2013.

R-3-8

7. A 1,200-foot long bank protection project is being proposed by the Corps just north of SR-91 between Gypsum Canyon Road and Coal Canyon Road where the river low flow is just north of and adjacent to the existing bikeway. This project will protect the bikeway and SR-91 from erosion due to flood releases from Prado Dam. Due to its proximity, the SR-91 CIP Project may potentially impact this project. Please note that the need for this project was established after our

R-3-9

comment letter (OC Public Works letter to Caltrans dated August 21, 2008) was sent in response to Caltrans' Notice of Preparation for the SR-91 CIP.

R-3-9

8. A bikeway/trail improvement (also known as SAR Parkway Project) is being proposed by the County of Orange from Gypsum Canyon to the Orange/Riverside county boundary. This project will be located primarily on the existing bikeway just north of and adjacent to SR-91. Due to its proximity, the SR-91 CIP Project may potentially impact this project. Please note that that planning for this project was developed after our comment letter (OC Public Works letter to Caltrans dated August 21, 2008) was sent in response to Caltrans' Notice of Preparation for the SR-91 CIP.

R-3-10

9. Please note that the estimated date of completion for the SARI Line Project is mid-2013. Please update this information on the Draft EIR/EIS as appropriate.

R-3-11

10. Any work within federal right-of-way or affecting the Santa Ana River Mainstem Project needs approval from the US Army Corps of Engineers.

R-3-12

11. Downstream of Prado Dam, the Riverside County Flood Control and Water Conservation District is the local sponsor of the Santa Ana River Mainstem Project within Riverside County. Any work related to the SR-91 CIP Project within this reach of the Santa Ana River must be coordinated with this agency.

R-3-13

12. Any work that proposes to widen the B Canyon undercrossing needs to be coordinated with the GRGC management.

R-3-14

Should you need additional information please contact Ariel Corpuz at (714) 834-4329.

Flood Programs:

In response to your request dated May 25, 2011 Flood Programs/Hydrology reviewed the Draft Environmental Impact Report/Environmental Impact Statement for State Highway 91 and offers the following comments for your consideration:

R-3-15

1. Any proposed improvements in the Lower Santa Ana River will need to be reviewed and approved by the Orange County Flood Control District (OCFCD) and the US Army Corps of Engineers.
2. All work within or adjacent to OCFCD's right-of-way should be conducted so as not to adversely impact OCFCD's facility, access and/or maintenance capabilities. Furthermore, all work within, over, and under OCFCD's right of way should be conducted only after an encroachment permit for the proposed work

R-3-16

has been obtained from the County of Orange. For information regarding permit application, please visit our web site <http://www.ocplanning.net/>.

3. The California Department of Transportation should ensure that FEMA regulations and floodplain requirements are satisfied for the project.

If you have any questions regarding these comments, please contact Editha Llanes at 834-2534.

Sincerely,



Michael Balsamo
Manager, OC Communities Planning
OC Public Works/OC Planning
300 North Flower Street
Santa Ana, California 92702-4048
Michael.Balsamo@ocpw.ocgov.com

MB/mmc

cc: Mehdi Sobhani, Flood Programs



R-3-16

R-3-17

R-3-1

Refer to Section 3.1.3, Parks and Recreational Facilities, starting on page 3.1-52 in the EIR/EIS, which discusses the existing Santa Ana River Trail/Bike Lane on the north side of SR-91 in Orange County. An approximately 200-foot-long segment of this Trail/Bike Lane will be relocated farther north, within the right-of-way for Green River Road, to accommodate the widening of SR-91 and to move the Trail/Bike Lane farther away from the freeway facilities. RCTC will coordinate closely with Orange County Public Works during the design/build phase of the project to ensure that the relocated Trail/Bike Lane is designed and constructed to the appropriate County standards, that any detours of the Trail/Bike Lane during project construction for the safety of the Trail/Bike Lane users and the construction workers are minimized, and that alternative routes through the area are provided. The following was inserted as the sentence in the bulleted subsection titled “Santa Ana River Trail/Bike Lane” on page 4-38 in Section 4.2.3.9, Public Services, in the EIR/EIS to describe the level of significance of the project effects on the Santa Ana River Trail/Bike Lane under CEQA: “As a result, the impacts of Alternatives 1 and 2 on the Santa Ana River Trail/Bike Lane will be below a level of significance and would not be substantial.”

RCTC is committed to continuing to coordinate closely with Orange County Public Works during the design/build project phase to minimize impacts to the Trail/Bike Lane and its users.

R-3-2

The May 20, 2010 right-of-way relinquishment from the Department to Orange County Public Works for the Santa Ana River Interceptor (SARI) line project accommodates the SR-91 CIP. Specifically, based on the agreements of that relinquishment, the relinquished right-of-way would be used during construction of the SR-91 CIP. The preparation of the plans in Appendix L in the EIR/EIS was initiated well before this right-of-way relinquishment. Specifically, the base air photo and property information on those plans are from 2009. The final design plans developed during the project design/build phase will include this existing right-of-way relinquishment.

R-3-3

This proposed right-of-way relinquishment for the Santa Ana River project is being coordinated by the County and the Department with consideration of the future right-of-way limits for the SR-91 CIP. As a result, it is acknowledged that this proposed relinquishment will not be finalized until the final right-of-way limits for SR-91 are

confirmed. This is to ensure that the Department does not relinquish existing State right-of-way to the County until the right-of-way needs for an approved SR-91 Build Alternative are finalized. At that time, the relinquishment of land from the Department to the Orange County Flood Control District (OCFCD) will be finalized and shown as appropriate on the final SR-91 CIP plans. The proposed relinquishment will not be shown on the project exhibits until it is finalized and recorded, which will occur during the design/build phase of the SR-91 CIP.

R-3-4

The project improvements on the north side of SR-91 will all be outside the right-of-way for the Green River Golf Club property, generally south of the area being used by the Corps as part of its improvements in that area (south of the Santa Ana River and north of SR-91). The SR-91 CIP Build Alternatives will not require the temporary use or permanent acquisition of any land from the Green River Golf Club. The design plans for the project components in this area will include appropriate information on the Santa Ana River project and the County-owned property in this area.

R-3-5

The SR-91 CIP includes realigning Green River Road adjacent to the north side of the freeway. The Corps Santa Ana River Reach 9 Phase 2B project includes constructing a new private access road/driveway to the Green River Golf Club that would intersect with the cul-de-sac shown on Sheet 10 of Appendix L2. The proposed retaining wall would retain the southerly slope of the Reach 9 Phase 2B embankment. The private driveway and cul-de-sac adjacent to the existing Green River Golf Club access are being designed and constructed as part of the Corps project in this area. That Corps project is relocating the golf course access bridge over the Santa Ana River as well as realigning part of the Santa Ana River. The SR-91 CIP team has been coordinating, and will continue to coordinate, the design and construction of the SR-91 CIP facilities with the Corps and OCFCD during the design/build phase of the SR-91 CIP. The Green River Golf Club access road will be constructed in a T-intersection with the existing Green River Road as part of a separate Corps project. The design of the SR-91 CIP is being coordinated with the design and construction of the Corps project, including the access road for the Green River Golf Club. The realignment of Green River Road, the cul-de-sac, and a public access road to the Star Ranch driveway in this area will be constructed as part of the SR-91 CIP. Where the SR-91 CIP requires modifications to Corps' facilities at this location and elsewhere within the SR-91 CIP

project limits, RCTC and the Department will obtain a Section 408 permit from the Corps prior to start of construction.

R-3-6

As described earlier, the project improvements on the north side of SR-91 will all be outside the right-of-way for the Green River Golf Club property, generally south of the area being used by the Corps as part of its improvements in that area (south of the Santa Ana River and north of SR-91). The SR-91 CIP would not impact the operations of the Green River Golf Club and it would remain open during construction. As discussed in Section 3.15.3.3, Temporary Impacts, on page 3.15-15 in the EIR/EIS, there will be construction-related noise along and adjacent to SR-91 during construction of the project improvements south of the Green River Golf Club that could represent a short-term impact on sensitive receivers. However, golf typically is not considered to require extreme quiet, and golfers at this location already hear noise from traffic operations on SR-91. Because these impacts would be short term and golf is not dependent on extreme quiet, those impacts would not substantively affect operations at the golf club. In addition, all construction activities will conform to the provisions in Section 14-8.02 of the Department's "Sound Control Requirements." Refer to Section 3.15.3.3, Temporary Impacts, on page 3.15-15 in the EIR/EIS for additional discussion of temporary noise impacts. Therefore, the Build Alternatives would not impact activities on Green River Golf Club property.

R-3-7

The centerline shown represents the proposed shifted centerline and control line for SR-91.

As discussed in responses to comments R-3-5 and R-3-6, above, the SR-91 CIP will not impact the Green River Golf Club or its operations.

R-3-8

Construction of the SR-91 CIP is expected to begin in mid-2013. The Prado Auxiliary Dike Improvements Project and Auto Center Grade Separation Project are expected to be completed sometime in 2013 so there would be minimal overlap in construction activities for those projects. However, should there be an overlap in the construction schedules of these projects with the SR-91 CIP, the stage construction and traffic management for the SR-91 CIP will be coordinated with the plans for those other projects to minimize impacts to local traffic circulation. As shown on Table O.3, on

page O-15, construction of the SR-91 CIP is expected to begin in spring to summer 2013.

The Prado Auxiliary Dike Improvements Project, as part of the Santa Ana River Mainstem Project, and the Auto Center Grade Separation Project are discussed in Tables 3.25.1 and 3.25.2 of Section 3.25, Cumulative Impacts, in the EIR/EIS. As discussed in Section 3.25.5.3, Short-Term Impacts on Traffic Circulation, in the EIR/EIS in Tables 3.25.1 (on page 3.25-43) and 3.25.2 (on page 3.25-55), the appropriate mitigation for short-term traffic impacts is a Transportation Management Plan (TMP). If the construction of the selected SR-91 CIP Build Alternative occurs concurrently with the construction of other projects in the vicinity of SR-91, the TMPs for those projects would need to be coordinated among the local, State, and/or federal agencies that have jurisdiction over those projects. Appropriate coordination with local jurisdictions and area emergency service providers would ensure that short-term traffic effects during construction are minimized by keeping those parties and the public informed as to the status of street, ramp, freeway, and lane closures, detours, and other short-term changes in traffic conditions in the study area.

R-3-9

The Corps Santa Ana River Reach 9 Phase 2B embankment project is north of the SARI project and outside existing Department right-of-way. The SR-91 CIP improvements in this area would be entirely within the existing State right-of-way for SR-91. That project would not be impacted by the SR-91 CIP because no SR-91 CIP features would extend north to or into this embankment project, and no construction activities would occur in the vicinity of the embankment project.

R-3-10

It is acknowledged that the County has initiated planning for a proposed Santa Ana River Parkway Project from approximately Gypsum Canyon Road east to the Orange/Riverside County boundary, generally along the existing Santa Ana River Trail/Bike Lane. Refer to response to comment R-3-1, above, which describes the temporary impacts of the SR-91 CIP Build Alternatives on the Santa Ana River Trail/Bike Lane (i.e., Trail/Bike Lane relocation and temporary detours). Because this proposed project would be generally along the existing Trail/Bike Lane, impacts to that trail during construction of the SR-91 CIP, should the parkway project be installed prior to construction of SR-91 CIP, would be similar to the temporary impacts to the Trail/Bike Lane described in response to comment R-3-1, above. A short segment of the Trail/Bike Lane will be relocated farther north, farther from the

SR-91 freeway facilities, as part of the SR-91 Build Alternatives. As a result, the SR-91 CIP would not conflict with the proposed Santa Ana River Parkway Project. As noted in other responses to comment letter R-3, RCTC will continue to coordinate the SR-91 CIP with Orange County Public Works through the design/build process. As a result, the plans for the Santa Ana River Parkway Project can be appropriately coordinated with the construction of the SR-91 CIP.

R-3-11

References to the SARI project in the EIR/EIS were updated to reflect the new estimated date of completion of mid-2013. Revisions were made in Table 2.1, Other Related Major Projects on page 2-8; in the last paragraph of Section 2.3.9.1, Approved or In-Process Projects starting on page 2-151; in Table 3.25.2, Summary of Land Development and Nontransportation Infrastructure Projects in the SR-91 CIP Study Area, on page 3.25-60; and in Table 5.2, SR-91 CIP Meeting Summaries, on page 5-6.

R-3-12

The SR-91 CIP has been, and will continue to be, coordinated with the Corps in areas near the Corps Reach 9 Phase 2B and 2A projects, which are components of the Santa Ana River Mainstem bank protection program. The Reach 9 Phase 2B project is currently under construction, and the Reach 9 Phase 2A project is in design. The Santa Ana River Mainstem project components do not overlap with or extend into the disturbance limits for the SR-91 CIP.

R-3-13

Refer to response to comment R-3-12, above.

R-3-14

The SR-91 CIP will extend and flare the existing box culvert at the B Canyon undercrossing. These improvements will be coordinated with Orange County Public Works and the Green River Golf Club during the project design/build phase, as appropriate.

R-3-15

Any improvements to the Lower Santa Ana River will be reviewed and approved by the OCFCD and the Corps during the project design/build phase. Refer to Table S.5 on page S-57 in the EIR/EIS for a list of permits and approvals needed for the SR-91 CIP, which was expanded to specifically cite coordination with Riverside and Orange Counties for any encroachments into property owned by those agencies, such as land

under the control of the OCFCD. Refer also to Section 3.9, Hydrology and Floodplains, starting on page 3.9-1 in the EIR/EIS for discussion of flood control facilities in the project area and potential project effects related to floodplains and flood control facilities.

R-3-16

The final design will be coordinated with the OCFCD, and any necessary encroachment permits will be obtained prior to the start of any work on land under the control of the OCFCD, as noted in Table S.5 on page S-57 in the EIR/EIS.

R-3-17

As discussed in Section 3.9.3, Environmental Consequences, on page 3.9-6 in the EIR/EIS, the SR-91 Build Alternatives will encroach into and modify the 100-year floodplains at the Santa Ana River at Wardlow Wash, Country Club Creek, and West Grand Boulevard. However, those encroachments are too minor to result in a substantial change in the 100-year water surface elevation at these locations in the floodplains. As documented in the *Location Hydraulic Study* (May 2010), the water surface elevation calculated to the nearest 0.01 ft and the water velocity calculated to the nearest 0.01 ft per second are the same for the existing condition and the with-project condition. As a result, there would be no substantial change in the 100-year water surface elevations at these locations. The *Location Hydraulic Study* and the *Summary Floodplain Encroachment* for the SR-91 CIP improvements on these study areas document that the project would not introduce additional risk to the existing environment and surrounding infrastructure. There are no impacts to the natural and beneficial floodplain values in any of the study areas due to the encroachment of the proposed improvements for the SR-91 CIP.

Therefore, as discussed in the subsection titled “Agency Coordination” on page 3.9-21 in Section 3.9.3, Environmental Consequences, coordination with Federal Emergency Management Agency (FEMA) for modifications to the 100-year floodplain maps is not required because the encroachments would not result in an appreciable increase of the 100-year water surface elevation or change the boundaries of the 100-year floodplain. All the SR-91 CIP improvements, including project features in and near the 100-year floodplain, will be designed consistent with all applicable Department design standards, including design standards related to facilities in and near floodplains.

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July 5, 2011

Mr. Aaron Burton
California Department of Transportation, District 8
464 West 4th Street, 6th Floor
San Bernardino, CA 92401

**RE: STATE ROUTE 91 CORRIDOR IMPROVEMENT PROJECT EIR/EIS
EA 08-0F5400**

Dear Mr. Burton,

The Regional Conservation Authority (RCA) has reviewed the draft environmental document for the State Route 91 CIP project dated May 2011. The RCA is a joint powers authority created to administer the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP), protecting the 146 native species of plants and animals within a half million acres of their habitat in Western Riverside County. The California Department of Transportation is one of twenty four member agencies (Permittees) comprising the RCA.

The RCA considers the linkage between the Santa Ana Mountains and the Puente-Chino Hill/Prado Basin to be critical for this area and appreciates Caltrans and RCTC efforts to assess the wildlife corridors within the project limits (SR 91 NES). We also appreciate both agencies continued willingness to work with us in arriving at a wildlife connectivity solution under SR 91 given the lack of viability of Linkage 1 and 2 due to public and private development subsequent to MSHCP approval. The document correctly identifies B Canyon as the proposed linkage replacement.

We have the following comments:

1. B Canyon, pg 3.17-13 – Amendment of the MSHCP to accommodate B Canyon as a linkage is not necessary for the actions needed to implement it to proceed. The RCA is actively working on land acquisition for the linkage and continues to coordinate with the Army Corps, Orange County Water District and Riverside County Flood Control regarding projects on the north side of SR 91 that may affect the B Canyon linkage or further affect Linkage 1 or 2. Please include a measure/environmental commitment to develop a separate project to improve the existing structure under SR 91 at B Canyon.

R-4-1

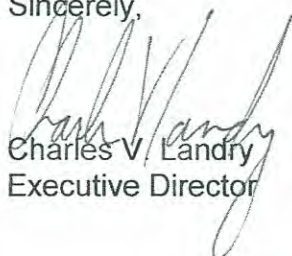
R-4-2

Mr. Aaron Burton
Page 2
July 5, 2011

2. West Prado Road Undercrossing (Linkage 1), pg 3.17-14 – Linkage 1 is constrained by development approved on the south and improvements recently made to the Green River Road/SR 91 Interchange. The linkage is not considered functional for large mammals as the EIR/EIS asserts. R-4-3
3. Measure NC-3, Table E-1 – While the MSHCP only specifically restricts vegetation clearance from March 1-June 30, the Migratory Bird Treaty Act still applies within the boundaries of the MSHCP and restrictions on vegetation removal should take into account specific vegetation and potential species occurrence within the project footprint. We recommend using the same seasonal date range in Riverside County as referenced for Orange County (Feb.15-Aug.31). R-4-4
4. Measures NC-7, NC-12, NC-13, Table E-1- We request that these measures also include B Canyon. R-4-5
5. Measures NC-6, NC-8, NC-9, NC-10 and NC-11, Table E-1 – We request that all measures to identify and protect wildlife corridors include B Canyon. R-4-6

We appreciate the opportunity to work with Caltrans and RCTC on the State Route 91 CIP project and look forward to further joint efforts to improve wildlife movement in the area.

Sincerely,



Charles V. Landry
Executive Director

cc: Steve Keel, RCTC
Laurie Dobson Correa, RCA

R-4-1

Refer to responses to comments R-4-2 through R-4-6, below.

R-4-2

Refer to response to comment F-2-2 provided on page O-48 earlier in this appendix. As stated in that earlier response, the B Canyon proposal is a separate project. The B Canyon project has separate and independent utilities, is not a requirement for the SR-91 CIP, and is not itself dependent on the implementation of the SR-91 CIP. It is a project for which RCTC and the Department have made commitments independent of and separate from the SR-91 CIP. The B Canyon project is not needed as mitigation for the SR-91 CIP and, therefore, is not an SR-91 CIP project commitment or project component.

R-4-3

The text in the part of Section 3.17.2.4 on page 3.17-14 in the EIR/EIS discussing the West Prado Road Undercrossing (Western Riverside County MSHCP Proposed Constrained Linkage 1) was revised to clarify that this linkage currently provides for large mammal movement although it is not expected to continue to function for large mammal movement in the future due to continuing land development, Green River Road, West Prado Road, existing fencing, and railroad lines. The resource agencies and other agencies are evaluating alternatives for this linkage independent of the SR-91 CIP. The SR-91 CIP will not result in adverse impacts at this linkage.

R-4-4

Refer to response to comment S-3-3 earlier in this report, which explains that the language in Measure NC-3 in Section 3.17.4.2, Other Measures, was revised to indicate that all vegetation removal will be conducted outside a single time period (February 15 to September 15). As explained in the response to comment S-3-3, because of differing time frames for vegetation removal, Measure NC-3 uses the longest period to ensure compliance with applicable requirements in both Riverside and Orange Counties. In addition, the period for the removal of vegetation in the Biological Opinion is February to September. As a result, the end date for vegetation removal was not changed to August 31, as recommended in this comment.

R-4-5

Measures NC-7, NC-12, and NC-13 in Section 3.17.4.2, Other Measures, on pages 3.17-32 through 3.17-34 in the EIR/EIS were revised to include B Canyon as requested. Those changes in those measures are shown in *italics* below:

NC-7 During final design, RCTC's Project Engineer will coordinate with the Designated Qualified Biologist to identify the habitat adjacent to Coal Canyon, *B Canyon*, Fresno Canyon/Wardlow Wash, and Bedford Wash that is anticipated to be disturbed by construction activities and will delineate those areas on the project specifications.

As detailed in the project specifications, RCTC's Resident Engineer will require the design/build contractor to restore habitat adjacent to Coal Canyon, B Canyon, Fresno Canyon/Wardlow Wash, and Bedford Wash that was disturbed during construction as construction in the affected areas is completed. That restoration will be provided on a 1:1 ratio, using native vegetation as determined by RCTC and the Department in coordination with the resource agencies.

NC-12 Within Coal Canyon, *B Canyon*, Fresno Canyon/Wardlow Wash, and Bedford Wash, RCTC's Resident Engineer will require the design/build contractor to limit the hours of construction within 1,000 ft of the centerline of each of these crossings to daylight hours (7:00 a.m. to 7:00 p.m.) to ensure continued use of these wildlife corridors during construction, with the exception of limited periods when evening or night work is required for operational reasons. Operational reasons may include the desire to conduct certain construction activities, such as closing multiple ramps or travel lanes, during evening and night hours to minimize delays to the traveling public. Any night construction must be approved in writing by the RCTC Resident Engineer and coordinated with the District 8 and 12 biologists, the USFWS, and CDFG.

NC-13 During final design, RCTC's Project Engineer will ensure that the design and construction process for all structures required for bridge *and/or culvert work* within Coal Canyon, *B Canyon*, Fresno Canyon/Wardlow Wash, and Bedford Wash, will not block the main underpass at these

locations during construction. RCTC's Project Engineer will ensure that the design of the scaffolding and false work is restricted to the sides of the underpass and limits of the existing exclusionary chain-link fence to maintain the existing width of the wildlife corridor during construction activities.

During construction within Coal Canyon, *B Canyon*, Fresno Canyon/Wardlow Wash, and Bedford Wash, RCTC's Resident Engineer will require the design/build contractor to ensure that all structures required for bridgework are installed and constructed consistent with the final design specifically to avoid blocking the main underpass during construction and to restrict all scaffolding and false work to the sides of the underpass and limits of the existing exclusionary chain-link fence to maintain the existing width of the wildlife corridor during construction activities.

R-4-6

Measures NC-6, NC-8, NC-9, NC-10, and NC-11 in Section 3.17.4.2, Other Measures, on pages 3.17-32 and 3.17-33 in the EIR/EIS apply to the entire length of the project, not just at wildlife crossings. As a result, these measures will apply to B Canyon.



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**Review of the Draft Environmental Impact Report (EIR) for the
State Route (SR) 91 Corridor Improvement Project**

The South Coast Air Quality Management District (AQMD) staff appreciates the opportunity to comment on the above mentioned document including the lead agency's willingness to consider late comments. AQMD staff is concerned that the draft EIR provides an inadequate air quality analysis for the proposed project. As a result, the air quality impacts may be understated in the draft EIR and potentially significant impacts may not have been disclosed to the public. The lead agency generally concludes that the project will have a net environmental benefit by reducing regional air quality impacts by improving traffic flow and reducing congestion in the project area. AQMD staff recognizes and strongly supports the benefits of increased traffic flow and decreased traffic congestion that can reduce exhaust emissions from cars and trucks. However, AQMD staff is concerned that the proposed project could increase health risk impacts to residents in close proximity to the State Route (SR) 91 Corridor and provide growth inducing impacts. The project will add one general purpose lane to SR 91 (within the project area) and maintain existing high occupancy vehicle (HOV) lanes or provide two additional toll express lanes in each direction. As a result, additional freeway lanes will be placed closer to residences potentially increasing health risk impacts to residents adjacent to the project area. Further, the addition of lanes will increase freeway capacity and could have potential growth inducing impacts.

There are four primary areas in which the draft EIR has not addressed the potential for air quality impacts. These include the determination of localized air quality impacts, the growth inducing potential of the project, the use of an inappropriate CEQA baseline for existing conditions, and the lack of quantification of mitigation measure effectiveness. Because of the technical inadequacies of the draft EIR the AQMD staff strongly recommends that the lead agency revise the air quality analysis based on the comments contained within this letter and include the revised analysis in the final EIR.

R-5-1

Pursuant to Public Resources Code Section 21092.5, we request that the lead agency provide the AQMD with written responses to all comments contained herein prior to the adoption of the final EIR. Additional detailed comments on this project are attached to this letter. Should you have any questions, please contact me at (909) 396-3105.

↑
R-5-1

Sincerely,



Ian MacMillan

Program Supervisor, CEQA Inter-Governmental Review
Planning, Rule Development & Area Sources

Attachment

SN:DG

ORC110520-02
Control Number

Local Air Quality Impacts

1. The lead agency did not conduct a localized air quality analysis or Health Risk Assessment (HRA) to determine how the construction or operation of the project may impact the residences adjacent to the SR 91 Corridor. According to the project description (Chapter One) of the draft EIR, up to 129,100 additional vehicles per day will travel on this segment of SR 91. The lead agency did not analyze the potential impacts to local ambient air quality standards from this activity, nor did it evaluate potential health risks.

R-5-2

Further, the lead agency determined that the proposed project will have short term air quality impacts from construction related activities, but did not present the peak daily emissions that are expected from the project in the draft EIR. Therefore, AQMD staff recommends that the lead agency quantify the construction emissions from the proposed project and use the AQMD's construction emissions thresholds to make a significance determination.¹

R-5-3

The lead agency relied on guidance from the Federal Highway Administration to determine that a quantitative analysis of toxic impacts is not possible due to potential uncertainties and that only a qualitative analysis is possible. This approach ignores section 15064 of the CEQA Guidelines that requires *substantial evidence* to determine the significance of an impact. Furthermore, Caltrans has relied on a HRA for other CEQA documents including the Schuyler Heims Bridge project and has agreed to conduct an HRA for the I-710 corridor expansion project. Therefore, AQMD staff recommends that the lead agency revise the air quality analysis to include a HRA for the proposed project. Further, the lead agency is strongly encouraged to use the SCAQMD regional and local significance thresholds for any project carried out within its jurisdiction.

R-5-4

Growth Inducing Potential and Cumulative Impacts

2. The lead agency claims that the SR 91 currently serves 280,000 vehicles per day, and that by 2035, the project could serve up to 409,100 vehicles per day. Further, the lead agency states that construction of this project will not generate new vehicle trips because 1) the project is intended to alleviate existing and future traffic congestion along SR 91 during peak hours and 2) the project would not generate new vehicular trips because it will not construct new homes or businesses. This argument ignores the requirements (Section 15126 and 15126.2 of the CEQA Guidelines) to assess growth inducing potential and cumulative impacts from the project.

R-5-5

The project will construct additional freeway lanes. Despite the argument that the proposed project will not generate additional trips, no enforceable measures have been included that will ensure that no additional trips occur. For example, if traffic increases beyond what is projected in this draft EIR, and more vehicles use this segment of SR 91, then the additional capacity that this project provides may result in additional air quality impacts. This scenario would lessen any potential regional benefits that the draft EIR is claiming. If the lead agency chooses not to assess this impact, than an enforceable measure is needed to ensure less than significant air quality impacts.

R-5-6

¹ <http://www.aqmd.gov/ceqa/hdbk.html>

Further, while this project may not directly generate traffic, it accommodates and potentially encourages growth. This indirect impact is “cumulatively considerable” under CEQA and must be analyzed by comparing existing conditions with future project conditions.

R-5-7

Effectiveness of Mitigation Measures

3. The lead agency states in the Air Quality Analysis that the project will reduce its construction emissions by utilizing mitigation measures SC-1 through SC-5. However, because the lead agency did provide a quantitative analysis of construction emissions or construction mitigation measures it has not demonstrated that there will be any reduction in emissions through the implementation of these mitigation measures or that the project will not pose a significant impact on the environment.

R-5-8

CEQA Baseline

4. The lead agency used an incorrect CEQA baseline throughout the analysis to determine the significance of impacts. Pursuant to Section 15125 of the CEQA Guidelines, the existing environmental setting “at the time that environmental assessment commences . . . will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant.” Instead of using this required methodology, the lead agency chose to compare a hypothetical and speculative future scenario without the project to one with the project. This speculative approach is contrary to CEQA requirements and serves to underestimate potential impacts. Further, in Table 3.14.4 of the Air Quality Analysis, the lead agency states that the project will have a net benefit by reducing regional PM10 emissions by seven pounds per day.

R-5-9

R-5-1

This comment letter was submitted after the close of the public comment period, and the commenting agency did not request an extension of the review period from the Department. In compliance with the requirements of NEPA, responses to the comments in this comment letter are provided below. Refer to responses to comments R-5-2 through R-5-9, below. Refer also to Table O.2 on page O-11, which indicates the Final EIR/EIS will be available to commenting agencies in mid-2012. Although for CEQA purposes, no response to the comments in this letter is required (refer to Section 15088 in the State CEQA Guidelines), they are provided here as noted above.

R-5-2

The analysis of air quality impacts for the proposed project were conducted consistent with the Department-adopted protocols and guidance and address both construction and operational impacts of the proposed project. As described in Section 3.14, Air Quality, starting on page 3.14-1 in the EIR/EIS, local analyses were conducted for criteria air pollutants and MSATs following the October 2009 FHWA MSAT guidance. As noted in its SER, the Department has adopted the FHWA guidance for evaluating MSAT emissions. It was determined that the project would reduce criteria air pollutant and MSAT emissions locally and regionally. As discussed in Section 3.14.3.2, Permanent Impacts, starting on page 3.14-28 in the EIR/EIS, the MSAT emissions under the No Build and Build Alternatives would be substantially lower than Existing (2007) conditions. Therefore, because the SR-91 Build Alternatives would reduce MSAT emissions locally and regionally, a detailed HRA was not needed or conducted for the project.

Tables in Chapter 1, Project, show that traffic volumes on SR-91 and I-15 will increase in the future, with or without the Build Alternatives. As shown in Table 1.7, 2035 No Build Alternative Average Daily Traffic Growth, the increase in traffic demand on SR-91 is forecast as a result of regional growth that would occur with or without the project based on adopted Southern California Association of Governments (SCAG) regional demographic projections. As discussed in Section 3.2.3, Environmental Consequences, on page 3.2-9 in the EIR/EIS, the proposed SR-91 CIP would not result in any reasonably foreseeable project-related growth impacts. Refer also to responses to comments R-5-5 and R-5-6 below.

The primary pollutant of concern for health risk is DPM. As shown in Tables 3.14.20 through 3.14.24 in Section 3.14, Air Quality, when compared to the Baseline/Existing (2007) and No Build Conditions, the project would reduce the DPM emissions along

the project segments of SR-91 and I-15. Therefore, the project would reduce the long-term health risk along SR-91 and I-15. Refer also to response to comments F-3-5 and F-3-11 on pages O-59 and O-69, respectively, for the MSAT-related effect of the project.

Health effects of diesel vehicles and equipment are evaluated over a 70-year period. As stated in Section 3.14.3.2, on page 3.14-17 of the EIR/EIS, no phase of construction would last more than 5 years. In addition, the on-site equipment would not be located in the vicinity of any one location for the entire duration of a phase. Therefore, the short-term exposure to the construction activities would not result in any long-term health risks.

R-5-3

The air quality analyses were prepared using Department-adopted protocols and guidance (SER July 2011). The Department has not adopted the SCAQMD or any other numeric thresholds for determining significance of air quality effects under CEQA because as a State agency, there is no one set of numeric thresholds that would be applicable statewide for Department projects. In addition, the SCAQMD's significance thresholds for construction emissions do not apply to the SR-91 CIP because no construction permit is required for this project from the SCAQMD. Nonetheless, additional quantitative analysis of construction emissions was prepared using the Sacramento Metropolitan Air Quality Management District's (SMAQMD) emissions model. The results of that analysis are provided starting on page 4-48 of Chapter 4.0.

Following SCAQMD Rule 403 and the other control measures that are provided in Section 3.14.4, Avoidance, Minimization, and/or Mitigation Measures, starting on page 3.14-39 in the EIR/EIS will substantially reduce construction emissions.

The comment states that the failure to prepare a quantitative MSAT analysis ignores Section 15064 of the CEQA Guidelines that requires *substantial evidence* to determine the significance of an impact. The FHWA's Interim Guidance Update on Mobile Source Air Toxic Analysis in NEPA Documents¹ provides substantial evidence documenting the basis for not conducting a quantitative MSAT analysis. SCAQMD may disagree with this conclusion, but Section 15151 of the CEQA

¹ <http://www.fhwa.dot.gov/environment/airtoxic/100109guidmem.htm>.

Guidelines clearly states that disagreement among experts does not make an EIR inadequate.

R-5-4

Refer to response to comment R-5-2, above. Because the SR-91 Build Alternatives would reduce MSAT emissions locally and regionally, a detailed HRA was not conducted for the project. Refer also to response to comment F-3-11, on page O-69, regarding discussion of schools in the vicinity of the project segment of SR-91.

The comment states that the failure to prepare a quantitative MSAT analysis ignores Section 15064 of the CEQA Guidelines, which requires *substantial evidence* to determine the significance of an impact. As discussed in the response to comment R-5-3, above, FHWA's Interim Guidance Update on Mobile Source Air Toxic Analysis in NEPA Documents provides substantial evidence documenting the basis for not conducting a quantitative MSAT analysis.

The comment goes on to suggest that the Department should perform a quantitative MSAT analysis for the SR-91 CIP because the Department relied on another agency's HRA for the Schuyler Heim Bridge project in Los Angeles County and the Department also conducted an HRA for the Interstate 710 (I-710) expansion project in Los Angeles County. The Department agreed to use the HRA for the Schuyler Heim Bridge project and conduct an HRA for the I-710 expansion project because of the high volume of diesel truck traffic at these two locations (over 30 percent trucks near the San Pedro Bay Ports) and because of the documented high levels of public health risk due to DPM in the vicinity of those two projects. Neither of those conditions apply to the SR-91 CIP, where truck volumes are close to the regional average of 6.9 percent; therefore, the Department conducted only the qualitative MSAT analysis as recommended in FHWA's Interim Guidance Update.

Finally, the comment encourages the Department to use the SCAQMD local and regional significance thresholds for making significance determinations under CEQA. As a statewide agency covering diverse geographic areas, the Department has, as a matter of policy, left the determination of significance to the District PDT. For the SR-91 CIP, the PDT made determinations of significance based on the results of the technical studies and did not use the SCAQMD thresholds.

R-5-5

Refer to Table 1.7 on page 1-25 in the EIR/EIS, which indicates the average daily traffic (ADT) in 2007 (Baseline/Existing) was 280,000 vehicles at the Orange/

Riverside County boundary and that the ADT at that location in 2035 under the No Build Alternative is forecast to be 409,100 vehicles. The two Build Alternatives were developed to address the 2035 traffic volumes because the 409,100 ADT represents substantially more demand in the SR-91 corridor than can be met by the existing SR-91 facility.

As required in Section 15126 in the CEQA Guidelines, Section 3.2, Growth, starting on page 3.2-1 in the EIR/EIS, evaluates the potential for the Build Alternatives to result in growth-inducing impacts. The analysis in that section concluded that:

- Alternatives 1 and 2 would result in operational improvements on SR-91 and I-15 but would not substantially modify local, intra-regional, or inter-regional accessibility to/from SR-91 and I-15.
- Alternatives 1 and 2 are consistent with the Regional Transportation Plan (RTP) and the goals and policies of regional and local agencies.
- Alternatives 1 and 2 would accommodate existing, approved, and planned growth in the area, but are not expected to influence the amount, timing, or location of growth in the area.
- There are no reasonably foreseeable project-related growth impacts under Alternatives 1 and 2.

As required in Section 15126 in the CEQA Guidelines, Section 3.25, Cumulative Impacts, starting on page 3.25-1 in the EIR/EIS, provides a detailed analysis of the potential for the SR-91 CIP to contribute to cumulative impacts.

R-5-6

Refer to response to comment R-5-5, above. By adding capacity to SR-91, the SR-91 CIP may result in more trips using SR-91 (e.g., as a result of diversion from other parallel routes such as SR-60), but it will not create new trips in the region; only new residential and employment-related land uses can generate new trips. As concluded in the EIR/EIS and noted in response to comment R-5-5, there is no anticipated growth in trips in the region due to implementation of the SR-91 CIP. Therefore, no additional mitigation to reduce air quality impacts is required.

The traffic projections indicate that the facility will operate at capacity during peak hours under the Build and No Build Alternatives. That analysis indicates that the SR-91 CIP Build Alternatives will not result in desirable peak-hour LOS (LOS E or better); therefore, there will not be surplus capacity on SR-91. Because there will be no surplus capacity on SR-91 under the Build Alternatives, it is not expected that the

peak-hour traffic volumes would exceed the 2035 traffic forecasts for the Build Alternatives.

The traffic modeling does not attempt to predict upper and/or lower limits of expected traffic volumes. The traffic volumes reported in Section 3.6, Traffic and Transportation/Pedestrian and Bicycle Facilities, in the EIR/EIS are best estimates consistent with accepted planning practices and are based on the RCTC regional traffic forecasting model and the Orange County Traffic Analysis Model.

This comment does not present any substantial evidence that the forecasted traffic volumes underestimate future traffic volumes on SR-91. Further, there is no enforceable mitigation to prohibit more trips on a freeway than that forecasted in a traffic model as such a measure would violate the Interstate Commerce Act.

R-5-7

Refer to response to comment R-5-5, above, which indicates that the growth-inducing impact analysis for the project determined there are no reasonably foreseeable project-related growth impacts under Alternatives 1 and 2. Therefore, Alternatives 1 and 2 would not contribute, directly or indirectly, to cumulatively considerable growth effects in the area.

R-5-8

Because the Department does not quantify short-term construction emissions (per the Department's SER at: <http://www.dot.ca.gov/ser/vol1/sec3/physical/ch11air/chap11.htm#Ch11RecommMethods>), quantifying the reductions in those types of emissions provided by Measures SC-1 through SC-5 was not possible.

R-5-9

Section 3.14, Air Quality, starting on page 3.14-1 in the EIR/EIS, and the *Air Quality Assessment Report* include the existing conditions for carbon dioxide (CO₂) and MSAT emissions. In addition, Section 4.3, Climate Change, starting on page 4-43 in the EIR/EIS and Table 4.2 were updated to include the existing CO₂ emissions. The MSAT analysis was prepared following the FHWA MSAT Guidelines (October 2009), which has been adopted by the Department. The differences between the existing and 2015/2035 conditions for the criteria pollutants would be similar to the increase in regional vehicle miles traveled (VMT), which is approximately 30 to 60 percent. However, this projected growth in regional VMT and its associated increase in regional emissions is due to the projected growth in vehicle operations that is independent of the proposed project and will occur whether the project is constructed

or not. Tables 3.14.20 through 3.14.24 in Section 3.14, Air Quality, were updated to include the Baseline/Existing (2007) MSAT emissions. Refer to response to comment R-5-5, above, which explains that the proposed project is not growth inducing. As a result, the project's impacts were evaluated based on the change between the no build and build conditions. Refer also to Section 3.14.3.2, Permanent Impacts, on page 3.14-13 in the EIR/EIS, which indicates that Baseline/Existing (2007) traffic data were provided in the impacts discussion to allow for comparison of project effects with Baseline/Existing (2007) conditions.

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