

# **ATTACHMENT 3**

**COMMENT LETTERS**

**Monroe Master Drainage Plan Line E Stages 2 and 3, Line E-2, and Line E-5 Storm Drain Improvements Final IS/MND**  
**Letters of Comment and Responses**

The Draft Initial Study (IS) and Mitigated Negative Declaration (MND) for the Monroe Master Drainage Plan Line E Stages 2 and 3, Line E-2, and Line E-5 Storm Drain Improvements (Project) was circulated for public and agency review from November 6, 2018 to December 6, 2018 (State Clearinghouse [SCH] No. 2018111014). During the 30-day public and agency review period, comment letters were received from the agencies listed in the table below. The comments did not address the adequacy of the environmental document or raise any new environmental issues. Therefore, no changes to the IS/MND were required. However, staff has provided responses to all comments as a courtesy to the commenters.

Letter	Author	Page Number
A	Governor's Office of Planning and Research	RTC-2
B	Regional Water Quality Control Board	RTC-4
C	Western Municipal Water District	RTC-7
D	Northwest Mosquito and Vector Control District	RTC-8

LETTER

RESPONSE

Letter A



STATE OF CALIFORNIA  
GOVERNOR'S OFFICE of PLANNING AND RESEARCH

EDUARD G. BROWN, JR.  
GOVERNOR

NEN ALEY  
DIRECTOR

December 6, 2018

RECEIVED

DEC 10 2018

PUBLIC WORKS

Sweta Patel  
City of Riverside  
3900 Main Street, 3rd Floor  
Riverside, CA 92522

Subject: Monroev Master Drainage Plan Line E Stages 2 and 3, Line E-2, and Line E-5 Storm Drain Improvements  
SC#PR: 201811014

Dear Sweta Patel:

A-1

The State Clearinghouse submitted the above named Mitigated Negative Declaration to selected state agencies for review. The review period closed on December 5, 2018, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Scott Morgan  
Director, State Clearinghouse

A-1

This letter acknowledges that the City has complied with the State Clearinghouse review requirements for draft environmental documents pursuant to the California Environmental Quality Act, and that no state agencies provided comments on the Initial Study/Mitigated Negative Declaration.

**Document Details Report  
State Clearinghouse Data Base**

**SCH#** 201811014  
**Project Title** Monroe Master Drainage Pans, Line E Stages 2 and 3, Line E-2, and Line E-5 Storm Drain Improvements  
**Lead Agency** Riverside, City of

**Type** MND Mitigated Negative Declaration  
**Description** The proposed project includes the construction of approx. 11,200 lf of underground storm drain pipe within the Graton St, Outlein Ave, and Hermosa Dr rights-of-way; removing and rebuilding the existing curb, gutter, and street lights along the east side of Graton St between Lincoln Ave and Victoria Ave, and a back-and-forth operation for trenchless pipe installation underneath Gage Canal at the intersection of Graton St and Hermosa Dr.

**Lead Agency Contact**  
**Name** Swath Patel  
**Agency** City of Riverside  
**Phone** (951) 826-5714  
**email**  
**Address** 3900 Main Street, 3rd Floor  
**City** Riverside **State** CA **Zip** 92522  
**Fax**

**Project Location**  
**County** Riverside  
**City** Riverside  
**Region**  
**Lot/Long** 33° 54' 55" N / 117° 24' 55" W  
**Cross Streets** Graton St and Victoria Ave  
**Parcel No.**  
**Township** 3S **Range** 5W **Section** 16 **Base** SD

**Proximity to:**  
**Highways** 91  
**Airports**  
**Railways**  
**Waterways** Gage Canal  
**Schools** Hawthorne ES  
**Land Use** RA-5

**Project Issues**  
 Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic/Historic; Biological Resources; Flood Plain/Flooding; Forest/Land/Fire Hazard; Geologic/Seismic; Growth Including; Land Use; Minerals Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Soil Erosion/Compaction/Grading; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Regulation

**Reviewing Agencies**  
 Resources Agency; Department of Conservation; Department of Fish and Wildlife; Region 6, Cal Fire; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 8; Native American Heritage Commission; Department of Toxic Substances Control; Regional Water Quality Control Board, Region 8; State Water Resources Control Board, Division of Financial Assistance; State Water Resources Control Board, Division of Drinking Water; Air Resources Board; Transportation Projects

**Date Received** 11/05/2018 **Start of Review** 11/06/2018 **End of Review** 12/05/2018

Note: Blankets in data fields result from insufficient information provided by lead agency.

Letter B

From: Robertson, Glenn@Waterboards [mailto:Glenn.Robertson@waterboards.ca.gov]  
 Sent: Wednesday, December 05, 2018 5:25 PM  
 To: Patel, Swetaban  
 Cc: Reeder, Terry@Waterboards; Bill, Janon@Waterboards  
 Subject: [External] City of Riverside, Monroe Master Drainage Plan Line E, Stages 2 and 3, Line E-2, Line E-5

To Sweta Patel, Senior Engineer, City of Riverside:  
 Regional Board staff has reviewed your Mitigated Negative Declaration for the construction of 1,700 linear feet of underground storm drain pipe in southern Riverside along Gratton St, east of Victoria Avenue, among several drainage and lighting improvements.  
 Specifically, the City intends to conduct trenchless pipe installation, by means of a jack and bore operation, beneath the historic Gage Canal at the intersection of Gratton St. and Hermosa Drive. It has been our staff experience that discharges from jack and bore operations beneath any channel/canals may result in the drilling slurry residue entering waters of the United States ("inadvertent returns" or "frac-outs"), to be suspended by subsequent flows. Therefore, we request that you please notify the U.S. Army Corps of Engineers of your plans (if you need contacts, please reply and I will send them to you). If the USACE requires a Clean Water Act Section 404 Permit for a potential "fill to waters of the U.S.," please apply to the Regional Board for a CWA Section 401 Water Quality Standards Certification.

We thank you for your attention.  
 Glenn S. Robertson  
 Engineering Geologist, PG, M.S.  
 Regional Water Quality Control Board  
 3737 Main Street, Suite 500  
 Riverside, CA 92501  
 Phone (951) 782-3259  
 Fax (951) 781-6288  
 Email: [Glenn.Robertson@waterboards.ca.gov](mailto:Glenn.Robertson@waterboards.ca.gov)

B-1

Thank you for your comment on the Initial Study/Mitigated Negative Declaration (IS/MND) for the City of Riverside's Monroe Master Drainage Plan Line E, Stages 2 and 3, Line E-2, and Line E-5. Your area of concern is that the proposed jack-and-bore operations beneath the Gage Canal, at the intersection of Gratton Street and Hermosa Drive, could result in an inadvertent discharge to waters of the United States in the form of "inadvertent returns" or "frac-outs." We appreciate your concern and have provided the U.S. Army Corps of Engineers (USACE) with a copy of the Final IS/MND. We also submitted a follow up letter to USACE stating your concern regarding the Gage Canal, which then explains why the project would not impact Gage Canal and would not require a 404 permit.

We have concluded that the proposed project would not have a potential to result in "fill to waters of the U.S." for two reasons. First, while the Gage Canal has connectivity with the Santa Ana River, it is a concrete-lined agricultural canal that does not serve as a tributary to any traditional navigable waterway, and is therefore not considered to be a federally-protected wetland, or non-wetland water of the U.S. And even if it were, all impacts to the Gage Canal are to be avoided. Second, the proposed jack-and bore tunnel would be at a minimum depth of 3 feet below the canal and protection of the canal during construction would be a contract requirement. In the unlikely event that the canal were to be damaged during construction, the anticipated result would be the infiltration of the tunnel by water from the canal above, but not the opposite effect of "inadvertent returns" or "frac-outs" migrating 3 or more feet upward into the canal.

The USACE was provided with the opportunity to review the Draft IS/MND and they did not comment. A hard copy was sent directly to LaShawn Richardson, USACE, Regulatory Division, 915 Wilshire Boulevard, Los Angeles, CA 90017. Additionally, USACE reviewed the follow up letter we submitted and concurred that the project would not impact the Gage Canal and would not require a 404 Permit. A copy of the letter submitted to USACE is presented below.

B-1



An Employee-Owned Company

December 8, 2018

Ms. Inley Lovatt  
Planning Division  
U.S. Army Corps of Engineers  
Los Angeles District  
915 Wilshire Boulevard  
Los Angeles, CA 90017

Reference: U.S. Army Corps of Engineers Jurisdictional Determination for the City of Riverside's Monroe Master Drainage Plan Storm Drain Line E, Stages 2 and 3, Storm Drain Line E-2, and Storm Drain Line E-4 (RECON Number 18066)

Dear Ms. Lovatt:

I am writing to you regarding the City of Riverside's Monroe Master Drainage Plan Storm Drain Line E, Stages 2 and 3, Storm Drain Line E-2, and Storm Drain Line E-4. We appreciate your opinion on whether the U.S. Army Corps of Engineers (USACE) has jurisdiction over the Cage Canal and whether a jack-and-bore pipeline installation beneath it, the canal, would be an activity that your office would regulate.

We provided your office with an Initial Study/Mitigated Negative Declaration and Notice of Intent with a public review period that extended from November 8, 2018 through today, December 6, 2018. The IS/MND addresses the potential environmental effects of the construction of 11,200 linear feet of underground storm drain pipe in southern Riverside, along Gratian Street, east of Victoria Avenue, among several drainage and lighting improvements. Of specific potential interest to the USACE, the City intends to conduct trenchless pipe installation, by means of a jack-and-bore operation, beneath the historic Cage Canal at the intersection of Gratian Street, and Hornum Drive.

We received a comment letter emailed from the Regional Water Quality Control Board (RWQCB) stating that it has been their experience that discharges from jack-and-bore operations beneath any channels under Santa Ana River, it is a concentrated agricultural canal that does not serve as a tributary to any traditional navigable waterway, and is therefore not considered to be a federally-protected wetland, or non-wetland water of the U.S. And even if it were, all impacts to the Cage Canal are to be avoided. Second, the proposed jack-and-bore tunnel would be at a minimum depth of 3 feet below the canal and protection of the canal during construction would be a contract requirement. In the unlikely event that the canal were to be damaged during construction, the anticipated result would be the infiltration of the tunnel by water from the canal above, but not the opposite effect of "independent returns" or "freonitis" migrating 3 or more feet upward into the canal.

Our environmental consultant has concluded that the proposed project would not have a potential to result in "fill to waters of the U.S." This is for two reasons. First, while the Cage Canal has connectivity with the Santa Ana River, it is a concentrated agricultural canal that does not serve as a tributary to any traditional navigable waterway, and is therefore not considered to be a federally-protected wetland, or non-wetland water of the U.S. And even if it were, all impacts to the Cage Canal are to be avoided. Second, the proposed jack-and-bore tunnel would be at a minimum depth of 3 feet below the canal and protection of the canal during construction would be a contract requirement. In the unlikely event that the canal were to be damaged during construction, the anticipated result would be the infiltration of the tunnel by water from the canal above, but not the opposite effect of "independent returns" or "freonitis" migrating 3 or more feet upward into the canal.

1827 Fifth Avenue, San Diego, CA 92101 | 619.308.9333 | reconenvromgmt.com  
SAN DIEGO | CENTRAL COAST | BERKELEY | TUCSON

LETTER

RESPONSE

Ms. LaShawn Richardson  
Page 2  
December 6, 2018

Additionally, the RWQCB has agreed that the former Gage Canal continuity is probably disconnected from the Santa Ana River, around the vicinity of University Avenue. But, because the southern segment feeds Moscardini Reservoir the RWQCB has asked that we contact you regarding your jurisdiction for the Gage Canal as waters of the U.S. and if our jack-and-bore construction beneath the canal would require a 404 Permit.

Please do not hesitate to call me at (951) 895-5714 if you would like to discuss or require additional information regarding this project and request. We appreciate your time and consideration.

Sincerely,



**Sereta Patel**  
City of Riverside  
Public Works Department, Engineering  
Direct: (951) 895-5714  
Mobile: (951) 462-5341  
[sereta.patel@cityofriverside.org](mailto:sereta.patel@cityofriverside.org)

Letter C

From: Hossein Juybari [mailto:hjuybari@wmwd.com]  
Sent: Wednesday, November 14, 2018 10:51 AM  
To: Patel, Swetaben  
Cc: Sonia Huff ; Hossein Juybari  
Subject: [External] Monroe Master Drainage Plan Line E - Public Notice

Sweta,  
We have reviewed the notice of intent to adopt the Mitigated Negative Declaration (MND) for the proposed project. The proposed underground drainage line crosses Western MWD non-potable water conveyance system. Please make sure that MND has a section for the utilities conflict.  
During the preliminary investigation for the utilities conflict/design process, the applicant/lead agency needs to make sure that there is no conflict between the proposed line and the existing utilities.

Thank you for providing us opportunity to review and comments.

Hossein Juybari  
Serving Western MWD

C-1

C-1 During the preliminary investigation for the utilities conflict/design process, the City will ensure that there are no conflicts between the proposed transmission line and the existing utilities.



Letter D



# NORTHWEST MOSQUITO AND VECTOR CONTROL DISTRICT

PUBLIC HEALTH GOVERNMENT AGENCY

November 6<sup>th</sup>, 2018

City of Riverside Public Works Department  
3900 Main St, 4<sup>th</sup> Floor  
Riverside, CA 92522  
Attn: Sweta Patel, P.E., Senior Engineer

Re: Mitigated Negative Declaration – Monroe Master Drainage Plan, Line E Stages 2 and 3, and Line E-3 Storm Drain Improvements

D-1

On behalf of Northwest Mosquito and Vector Control District, I'd like to express our appreciation for being included on these communications. Please accept these general comments with regards to our district needs. As a government agency vested with protecting the public from vectors and vector-borne diseases, our concern would be any standing or stagnant bodies of water which may breed mosquitoes and midges. Occasionally, standing water can accumulate during the implementation of development projects, particularly with added use of heavy machinery and/or increased density of staffing operating in a condensed space. Any impoundment of water which stands 3 days or longer can produce mosquitoes, and becomes a public nuisance or a health threat, or both.

As project planning and implementation progresses, please consider any additional means in mitigating the risk of the accumulation of standing water sources. If standing water is noted for a period greater than 3 days, and these potential breeding sources cannot be drained, please reach out to our office at (951) 340-9792 to allow for inspection and possible treatment. We would like all such areas to be made accessible to our technicians and vehicle traffic for the purposes of inspection and/or treatments targeting mosquito breeding. This would include maintaining access to Gage Canal during and subsequent to the scope of this project. Again, our sincere thanks for including us for comment, and we look forward to assisting with any additional questions or concerns.

Sincerely,

Angela Caranci, PhD  
Vector Ecologist

Cc: Major S. Dhillon, Ph.D., District Manager

1966 Compton Ave • Corona, CA 92881-3318 • (951) 340-9792 • FAX (951) 340-2515  
e mail: [office@northwestmvecd.org](mailto:office@northwestmvecd.org)

RECEIVED

NOV 08 2018

PUBLIC WORKS

D-1 Special provisions will be incorporated in the Contract to ensure the contractor is aware of any vector issues and the Northwest Mosquito and Vector Control District's vector control program. The provisions will require the contractor to construct the project in a manner that minimizes vector impacts and ensures that construction-related depressions do not hold standing water and drainage areas and Best Management Practices do not create potential mosquito breeding sources.