Comment Letter A

U.S. Department of Homeland Security
FEMA Region IX
1111 Broadway, Suite 1200
Oakland, CA. 94607-4052

FEMA

July 20, 2010

Warren Huang
City of Riverside, Department of Public Works
3900 Main Street
Riverside, California 92522

Dear Mr. Huang:

This is in response to your request for comments on the Notice of Availability, Draft Environmental Impact Report (EIR) for the Integrated Master Plan for Wastewater Collection and Treatment Facilities for the City of Riverside, California (SCH No. 2009041054).

Please review the current effective countywide Flood Insurance Rate Maps (FIRMs) for the County of Riverside (Community Number 060245) and City of Riverside (Community Number 060620), Maps revised August 28, 2008. Please note that the City of Riverside, Riverside County, California is a participant in the National Flood Insurance Program (NFIP). The minimum, basic NFIP floodplain management building requirements are described in Vol. 44 Code of Federal Regulations (44 CFR), Sections 59 through 65. A1

A summary of these NFIP floodplain management building requirements are as follows:

- All buildings constructed within a riverine floodplain, (i.e., Flood Zones A, AO, AH, AE, and A1 through A30 as delineated on the FIRM), must be elevated so that the lowest floor is at or above the Base Flood Elevation level in accordance with the effective Flood Insurance Rate Map.

- If the area of construction is located within a Regulatory Floodway as delineated on the FIRM, any ***development*** must not increase base flood elevation levels. **The term *development* means any man-made change to improved or unimproved real estate, including but not limited to buildings, other structures, mining, dredging, filling, grading, paving, excavation or drilling operations, and storage of equipment or materials.** A hydrologic and hydraulic analysis must be performed *prior* to the start of development, and must demonstrate that the development would not cause any rise in base flood levels. No rise is permitted within regulatory floodways. A2

- All buildings constructed within a coastal high hazard area, (any of the "V" Flood Zones as delineated on the FIRM), must be elevated on pilings and columns, so that the lowest horizontal structural member, (excluding the pilings and columns), is elevated to or above the base flood elevation level. In addition, the posts and pilings foundation and the structure attached thereto, is anchored to resist flotation, collapse and lateral movement due to the effects of wind and water loads acting simultaneously on all building components.

A2

- Upon completion of any development that changes existing Special Flood Hazard Areas, the NFIP directs all participating communities to submit the appropriate hydrologic and hydraulic data to FEMA for a FIRM revision. In accordance with 44 CFR, Section 65.3, as soon as practicable, but not later than six months after such data becomes available, a community shall notify FEMA of the changes by submitting technical data for a flood map revision. To obtain copies of FEMA's Flood Map Revision Application Packages, please refer to the FEMA website at http://www.fema.gov/business/nfip/forms.shtm.

Please Note:

Many NFIP participating communities have adopted floodplain management building requirements which are more restrictive than the minimum federal standards described in 44 CFR. Please contact the local community's floodplain manager for more information on local floodplain management building requirements. The Riverside County floodplain manager can be reached by calling Michael Lara, Director, Building and Safety Division, at (951) 955-1214. The City of Riverside floodplain manager can be reached by calling Thomas Boyd, City Engineer, at (951) 826-5575.

If you have any questions or concerns, please do not hesitate to call Frank Mansell of the Mitigation staff at (510) 627-7187.

Sincerely,

for Reg Lenaburg

Gregor Blackburn, CFM, Branch Chief
Floodplain Management and Insurance Branch

cc:
Thomas Boyd, City Engineer, City of Riverside
Michael Lara, Director, Building and Safety Division, Riverside County
Garret Tam Sing/Salomon Miranda, State of California, Department of Water Resources, Southern Region Office
Frank Mansell, Floodplanner, DHS/FEMA Region IX
Alessandro Amaglio, Environmental Officer, DHS/FEMA Region IX

California Natural Resources Agency
DEPARTMENT OF FISH AND GAME
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Inland Deserts Region
3602 Inland Empire Blvd., Suite C-200
Ontario, CA 91764
(909) 484-0167

***ARNOLD SCHWARZENEGGER**, Governor*
***JOHN MCCAMMAN**, Director*

July 30, 2010

Warren Huang
City of Riverside, Public Works Department
3900 Main Street
Riverside, CA 92522

Re: Draft Program Environmental Impact Report for the Integrated Master Plan for Wastewater Collection and Treatment Facilities SCH No. 2009041054

Dear Mr. Huang:

The Department of Fish and Game (Department) appreciates this opportunity to comment on the Draft Program Environmental Impact Report (DPEIR) for the Integrated Master Plan for Wastewater Collection and Treatment Facilities. The Department is a Trustee Agency under the California Environmental Quality Act (CEQA) and is responsible for ensuring appropriate conservation of fish and wildlife resources including rare, threatened, and endangered plant and animal species, pursuant to the California Endangered Species Act and as a Responsible Agency regarding any discretionary actions (CEQA Guidelines section 15381), such as a Lake and Streambed Alteration Agreement (Section 1600 *et seq.*) or a California Endangered Species Incidental Take Permit (Fish and Game Code Sections 2080 and 2080.1). The Department also administers the Natural Community Conservation Planning Program (NCCP).

On June 22, 2004, the Department issued Natural Community Conservation Plan Approval and Take Authorization for the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) as per section 2800, et seq., of the California Fish and Game Code. The MSHCP establishes a multiple species conservation program to minimize and mitigate habitat loss and the incidental take of 146 covered species on up to 510,000 acres in association with activities covered under the permit. Under the MSHCP, Permittees may carry out covered activities consistent with the MSHCP and its associated Implementing Agreement. The City of Riverside is a signatory to the MSHCP and is subject to the provisions and policies of that plan..

Section 15125(d) of CEQA requires the DPEIR discuss any inconsistencies between a proposed project and applicable general plans and regional plans, including habitat conservation plans and natural community conservation plans. Therefore, the DPEIR needs to address how this project may conflict with the policies and objectives of the MSHCP. B1

For this project the Department will be acting as a Trustee and Responsible Agency. As per Section 15096 of the California Environmental Quality Act statute, as a Responsible Agency the Department is obligated to focus its comments on any shortcomings in the CEQA

document, the appropriateness of the CEQA document utilized, and additional alternatives or mitigation measures which the CEQA document should include.

Project Description

The site is located in the City of Riverside, County of Riverside. The project site is bounded by Van Buren Blvd. to the west, the Santa Ana River to the north, and Jurupa Ave. to the south. Surrounding land uses include vacant land, industrial uses, commercial uses and residential. The Santa Ana River and the Hidden Valley Wildlife Area is located to the north and west of the project area.

The project applicants are planning to expand the existing facilities to include: expansion of the Plant 1 Primary Treatment, Plant 1 Membrane Bioreactor Facility, and two new digesters. New development would include construction of four new primaries to treat 32 million gallons per day (mgd) , primary effluent equalization basins for a total volume of up to 12.1 million gallons, a primary equalization pump station, a primary sludge pump station, primary sludge thickening facilities and a biofilter for odor scrubbing.

The Plant 1 Membrane Bioreactor (MBR) facility would consists of a 32 mgd MBR constructed in two phases. Two new digesters (20,000 sq. ft.) would be constructed. Although not specified at this time, the collection system upgrades could involve installation of new sewer pipelines, removal and replacement of old sewer pipelines, and rehabilitation of existing sewer pipelines.

Biological Resources Concerns

The Department believes that this project is of statewide, regional or area-wide significance (CEQA Section 15206 (b)(5)) because it is a project which would substantially affect sensitive wildlife habitats including but not limited to riparian lands, and habitats for endangered, rare and threatened species as defined by CEQA Section 15380. A biological assessment was conducted on January 23, 2008. To the north and west is the Santa Ana River and the Hidden Valley Wildlife Area. The following sensitive species have the potential to occur on the site: tricolored blackbird (*Agelaius tricolor*), western yellow-billed cuckoo (*Coccyzus americanus occidentalis*), least Bell's vireo (*Vireo bellii pusillus*), Santa Ana sucker (*Catostomus santaanaae*), arroyo chub (*Gila orcutti*), and Santa Ana speckled dace (*Rhinichthys osculus*). Other species that may occur on site include: western fence lizard (*Sceloporus occidentalis*), side-blotched lizard (*Uta stansburiana*), coyote (*Canis latrans*), bobcat (*Lynx rufus*) and common species of birds. Habitats adjacent to the site include southern cottonwood-willow riparian forest and freshwater emergent wetlands. B2

The proposed infrastructure improvements will occur at the existing wastewater treatment plant site. According to the DPEIR the plant site is disturbed and does not contain habitat for covered plants and species. No impacts are proposed to adjacent Santa Ana River riparian habitat, however, implementation of the project will result in additional releases of treated wastewater.

The expansion of the existing wastewater plant will occur in the footprint of the existing plant. Although there are sensitive biological resources adjacent to the plant in the Santa Ana River, the footprint of the plant does not extend out into these resources. The plant

footprint itself is maintained and does not contain sensitive biological resources. Therefore, the part of the project that has the potential to impact terrestrial and riparian resources is the construction associated with the future collection system upgrades, i.e., pipelines. The DPEIR speculates that the pipelines will be located within existing roadways and disturbed areas. However, the DPEIR also stipulates that the construction may involve the removal of trees, location of the pipeline outside of roadways, and other impacts. The DPEIR states that the size and location of future pipeline improvements are not known at this time. For this reason, there is no impact analysis and consequent measures to mitigate the potential impacts of the collection system. The DPEIR does state, however, that site-specific analyses would be prepared on a project-by-project basis for collection system upgrades. In order for the Department to review the future projects as per its mandate under CEQA, biological surveys must be conducted, sensitive biological resources identified, an analysis of the project's impact on identified sensitive biological resources must be provided, and measures to mitigate the impact of the project on identified resources must be provided

The biological surveys must identify impacts (both temporary and permanent) to biological resources (upland and riparian). If mitigation measures are proposed involving revegetation or creation of habitat, a monitoring and management plan must also be included.

B2

Future wastewater collection improvements shall be subject to CEQA regarding project impacts and mitigation for those identified impacts. The following items will need to be provided in subsequent CEQA documents:

- Surveys for sensitive plants and animals shall be conducted in connection with future projects;
- A thorough assessment of rare plants and rare natural communities, following the Department's November 2009 guidance for Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities. The guidance document can be found at the following link: http://www.dfg.ca.gov/biogeodata/cnddb/pdfs/Protocols_for_Surveying_and_Evaluating_Impacts.pdf
- An analysis of direct and indirect, temporary and permanent impacts to biological resources;
- A monitoring and maintenance plan for revegetated areas or created habitat;
- Mitigation measures or project changes to offset the loss of riparian habitat, listed riparian species and designated species of special concern;
- A detailed jurisdictional delineation of State Waters to identify and analyze direct, indirect, temporary and permanent impacts;

Streambed Alteration Agreements and CEQA

B3

Per section 15096 of the CEQA statute, as a Responsible Agency the Department is obligated to focus its comments on any inadequacies of the CEQA document and additional alternatives or mitigation measures which should be included in the CEQA document. As a Responsible Agency the Department will be obligated to consult the final CEQA document to prepare a Lake and Streambed Alteration Agreement or a California Endangered Species Incidental Take Permit. If the final CEQA document fails to identify and adequately mitigate all of the impacts of the proposed project and any alternatives, the project proponents will be required to reinitiate the CEQA process at their expense, or fund

another CEQA process under the direction of the Department to identify and adequately mitigate all impacts associated with any Department discretionary actions.

As per Section 15168 of the CEQA Statute, the use of a Program Environmental Impact Report for this project is warranted. Subsection "c" of Section 15168 provides that activities subsequent to the DPEIR must be examined to determine whether additional environmental documents must be prepared. Section 15168(c)(1) states that if a later project has effects that were not examined in the PEIR, a new initial study would have to be completed, leading to a subsequent CEQA document. B3

The primary impact of the project is the increased discharge of treated wastewater to the outfall at the Santa Ana River. In 2006, the rate of discharge was 33.5 mgd or approximately 32 percent of the total flow in the river. In the absence of recycled water diversions the discharge into the Santa Ana River could increase up to 52.2 mgd by the year 2025. No changes are proposed for the existing outfall. The additional discharge of treated wastewater (approximately 18 mgd) will occur over time, allowing the habitat to adjust to the increased water volume. Additionally, the area of discharge is subject to the larger impact of flooding of the Santa Ana River which has the ability to completely reconfigure flow patterns downstream of the outflow. The Department requests that the following information be included in the FEIR or subsequent CEQA document:

- How much wastewater is the plant legally obligated to release into the Santa Ana River;
- What is the intended use of the additional wastewater and whether it will be diverted for private/public use or released back into the river;
- Measures to minimize the impact of future wastewater releases on downstream resources, including the Hidden Valley Wildlife Area, and,
- The relationship of the wastewater plant to the Hidden Valley Wildlife Area and any legal obligations regarding the release of water for the Santa Ana sucker or the Hidden Valley Wildlife Area;
- Submittal of a 1600 Lake or Streambed Alteration Agreement Notification form for impacts to State jurisdictional waters.

B4

If the CEQA documents do not fully identify potential impacts to lakes, streams, and associated resources and provide adequate avoidance, mitigation, monitoring, funding sources, a habitat management plan and reporting commitments, additional CEQA documentation will be required prior to execution (signing) of the Agreement. In order to avoid delays or repetition of the CEQA process, potential impacts to a stream or lake, as well as avoidance and mitigation measures need to be discussed within this CEQA document.

The Department opposes the elimination of drainages, lakes and their associated habitats. The Department recommends avoiding the stream and riparian habitat to the greatest extent possible. Any unavoidable impacts need to be compensated with the creation and/or restoration of in-kind habitat either on-site or off-site at a minimum 3:1 replacement-to-impact ratio, depending on the impacts and proposed mitigation. Additional mitigation requirements through the Department's Streambed Alteration Agreement process may be required depending on the quality of habitat impacted, proposed mitigation, project design, and other factors. B5

We recommend submitting a notification early on, since modification of the proposed project may be required to avoid or reduce impacts to fish and wildlife resources. To obtain a Streambed Alteration Agreement notification package, please call (562) 430-7924.

The following information will be required for the processing of a Streambed Alteration Agreement and the Department recommends incorporating this information to avoid subsequent CEQA documentation and project delays: B6

1) Delineation of lakes, streams, and associated habitat that will be temporarily and/or permanently impacted by the proposed project (include an estimate of impact to each habitat type);
2) Discussion of avoidance measures to reduce project impacts; and,
3) Discussion of potential mitigation measures required to reduce the project impacts to a level of insignificance.

Section 15370 of the CEQA guidelines includes a definition of mitigation. It states that mitigation includes:

1) Avoiding the impact altogether by not taking a certain action or parts of an action,
2) Minimizing impacts by limiting the degree or magnitude of the action and its implementation,
3) Rectifying the impact by repairing, rehabilitating, or restoring the impacted environment,
4) Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action, B7
5) Compensating for the impact by replacing or providing substitute resources or environments.

In the absence of specific mitigation measures in the CEQA documents, the Department believes that it cannot fulfill its obligations as a Trustee and Responsible Agency for fish and wildlife resources. Permit negotiations conducted after and outside of the CEQA process deprive the public of its rights to know what project impacts are and how they are being mitigated in violation of CEQA Section 15002. Also, because mitigation to offset the impacts was not identified in the CEQA document, the Department does not believe that the Lead Agency can make the determination that impacts to jurisdictional drainages and/or riparian habitat are "less than significant" without knowing what the specific impacts and mitigation measures are that will reduce those impacts.

Thank you for this opportunity to comment. Please contact Robin Maloney-Rames at (909) 980-3818, if you have any questions regarding this letter.

Sincerely,

Jeff Brandt
Senior Environmental Scientist

cc: Michael Flores, DFG
Anna Milloy, DFG
Leslie MacNair, DFG
State Clearinghouse

Comment Letter C

Department of Toxic Substances Control

Maziar Movassaghi
Acting Director
5796 Corporate Avenue
Cypress, California 90630

Linda S. Adams
Secretary for
Environmental Protection

Arnold Schwarzenegger
Governor

July 29, 2010

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Mr. Warren Huang
City of Riverside, Public Works Department
3900 Main Street
Riverside, California 92522

NOTICE OF AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE INTEGRATED MASTER PLAN FOR WASTEWATER COLLECTION AND TREATMENT FACILITIES FOR CITY OF RIVERSIDE, CALIFORNIA PROJECT (SCH #2009041054), RIVERSIDE COUNTY

Dear Mr. Huang:

The Department of Toxic Substances Control (DTSC) has received your submitted draft Environmental Impact Report (EIR) for the above-mentioned project. The following project description is stated in your document:" The City of Riverside proposes to upgrade its Riverside Regional Water Quality Control Plant (RWQCP) from a current capacity of 40 million gallons per day (mgd) to approximately 52.2 mgd by year 2025 to accommodate the forecasted growth projections for the City of Riverside. The plant consists of approximately 106 acres of land. The proposed Integrated Wastewater Master Plan (IWWMP) (Proposed project) would construct new facilities and upgrade some existing facilities within the existing plant site located at 5950 Acorn Street in the City of Riverside. The site is located along the Santa Ana River and is within the Riverside Airport's Airport Influence Area. The site is bound to the west by Van Buren Boulevard, to the south by Jurupa Avenue, to the east by Acorn Street, and to the north, across the Santa Ana River, by Clay Street and general Drive. The site surrounded to the south by land designated as Industrial; to the north and west by land designated as Open Space/Natural Resources; and to the east by land designated as Business/Office Park (City of Riverside, 2007). There are 40 chemicals presently used and or stored on-site. Hazardous waste generated on-site also includes a minimal amount of volatile organic chemicals from cleaners and paints".

Based on the review of the submitted document DTSC has the following comments:

1) DTSC provided comments on the project Notice of Availability of the original draft EIR on May 7, 2009; those comments have not been addressed in the submitted draft Environmental Impact Report. Please ensure that those comments will be addressed in the final EIR. C1

2) DTSC can provide guidance for cleanup oversight through an Environmental Oversight Agreement (EOA) for government agencies which would not be responsible parties under CERCLA, or a Voluntary Cleanup Agreement (VCA) for private parties. For additional information on the EOA or VCA, please see www.dtsc.ca.gov/SiteCleanup/Brownfields, or contact Ms. Maryam Tasnif-Abbasi, DTSC's Voluntary Cleanup Coordinator, at (714) 484-5489. C2

If you have any questions regarding this letter, please contact Mr. Rafiq Ahmed, Project Manager, at rahmed@dtsc.ca.gov or by phone at (714) 484-5491.

Sincerely,

Greg Holmes
Unit Chief

Brownfields and Environmental Restoration Program

cc: Governor's Office of Planning and Research
State Clearinghouse
P.O. Box 3044
Sacramento, California 95812-3044
state.clearinghouse@opr.ca.gov

CEQA Tracking Center
Department of Toxic Substances Control
Office of Environmental Planning and Analysis
1001 I Street, 22nd Floor, M.S. 22-2
Sacramento, California 95814
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CEQA # 2972

Comment Letter D

South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

E-MAILED: July 30, 2010 July 30, 2010

Mr. Walter Huang WHuang@riversideca.gov
Public Works Department
City of Riverside
5950 Acorn Avenue
Riverside, CA 92504

Draft Program Environmental Impact Report (Draft PEIR) for the Proposed Integrated Master Plan for Wastewater Collection and Treatment Facilities

The South Coast Air Quality Management District (AQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into either the Recirculated or Final Program Environmental Impact Report (PEIR).

Localized AQ Impacts

In Section 1.1, the Lead Agency states that the Draft PEIR contains a project specific analysis of Phase I and program level analysis for additional program activities. No further CEQA document is expected to be distributed for Phase I in the future based on a telephone conversation with Lead Agency staff. AQMD staff is concerned that project related local impacts are not fully disclosed in the Draft PEIR.

On page 3.2-31, the Lead Agency states that the nearest sensitive receptors are located over 1,500 feet west of the proposed construction areas, however Figure 2-7 (Additional Construction Areas for Maximum with PRD Buildout Scenario) shows that the proposed Sludge Bed Area site is less than a quarter mile from those sensitive receptors. As the proposed project will increase total activities at the entire facility, increased emissions from the entire facility should be presented in either the Recirculated or Final PEIR. D1

The AQMD staff recommends that the Lead Agency conduct a localized significance analysis for construction and operational air quality impacts from sources that are less than a quarter mile from sensitive receptors. Quantified air emissions should be presented to demonstrate that construction and operational air quality impacts are less than significant rather than relying on compliance with air emissions permit limits. The air emissions permit limits do not disclose all project specific emission sources, e.g., demolition and off-site debris disposal, soil disturbance during excavation and grading, facility construction, vehicle emissions from on-site equipment, employee trips as well as the emissions from the proposed facility. These project specific emissions from both localized and regional construction and operational air quality impacts should be quantified and then compared with the respective localized and regional thresholds. In D2

addition, compliance with AQMD permitting requirements does not necessarily demonstrate that all project emissions will be lower than CEQA significance thresholds.

SCAQMD guidance for performing a localized air quality analysis can be found on the AQMD web page.[1] Should the Lead Agency conclude after its analyses that construction or operational localized air quality impacts exceed the SCAQMD daily significance thresholds, all feasible mitigation measures should be considered to reduce impacts to a less than significant level. Some construction related measures are available on the AQMD website.[3] D2

Permitting

Based on the project description, the current sewage treatment permit allows a maximum flow rate of 40 million gallons per day (mgd). In order to increase flows to the proposed volume of up to 63.9 mgd included in the project description, the project applicant needs to apply for permits to construct modifications with the AQMD. Separate applications are required for modification to the waste water treatment equipment, each air pollution control system, internal combustion engines, the biogas handling system, and any combustion equipment that will burn digester gas.

In addition, Table 3.2-8 (Change in Operational Emissions of Criteria Pollutants) of the Draft PEIR should indicate if the stated actual criteria pollutants for 2009 were reported in the annual emissions inventory report to the AQMD and subsequently audited. As indicated in the note below Table 3.2-8, the projected criteria emissions are projected to be proportional to the influent flow rate. Since the projected maximum facility-wide emissions of NOx and ROG are both estimated to be greater than 10 tons per year, the Final PEIR should indicate that the facility will be required to file for a Title V facility permit with the AQMD, and that the equipment modification must comply with current best available control technology or lowest achievable emission rate for all criteria pollutants which are increased by the proposed project. D3

Greenhouse Gas Thresholds

The Lead Agency presents significance thresholds for greenhouse gases (GHG) on page 3.2-22. These thresholds require that the project:

A) be consistent with CARB's state GHG Scoping Plan,
B) not exceed the stationary source reporting limit of 25,000 MT/yr CO_2e,
C) meet energy efficiency standards, and
D) be consistent with any local GHG plans.

The Lead Agency then uses these thresholds to conclude that this project will have a less than significant GHG impact. AQMD staff is concerned that the Lead Agency has not demonstrated the appropriateness of this threshold. In addition, the project-level analysis D4

[1] http://www.urbemis.com/
[2] http://www.aqmd.gov/ceqa/handbook/LST/LST.html
[3] http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html

in the Draft PEIR does not present enough information to conclude that impacts fall below these significance thresholds.

The threshold of 25,000 MT/yr CO_2e utilized in this analysis is not consistent with AQMD's preferred threshold of 10,000 MT/yr CO_2e for industrial sources.[2] The rationale cited for utilizing 25,000 MT/yr CO_2e is that 94% of all stationary sources emissions in California are from facilities that emit GHGs greater than this quantity. However, the 25,000 MT/yr CO_2e value was not developed for use as a CEQA threshold pursuant to CEQA Guidelines 15064.7. Indeed, although CARB specified a reporting threshold of 25,000 MT/yr CO_2e, it has considered adopting a much lower threshold (7,000 MT CO_2e) for CEQA purposes.[3] Therefore, AQMD staff recommends that the Lead Agency utilize a threshold that complies with CEQA Guidelines 15064.7 (such as AQMD's threshold). D4

Further explanation is also necessary to demonstrate that the proposed project is consistent with the CARB Scoping Plan. For example, in Table 3.2-4 of the Draft PEIR, there are several water-related measures, including increased conservation, efficiency, and recycling efforts that would reduce the need for a larger wastewater system. The Draft PEIR does not describe alternatives that would be consistent with these water measures contained in the CARB Scoping Plan. As the project only expands wastewater operations, the Lead Agency has not demonstrated that GHG impacts are less than significant. AQMD staff recommends that the Lead Agency present additional information addressing how the project complies with the CARB Scoping Plan.

Greenhouse Gas Quantification

AQMD staff is concerned that the quantification of GHGs in the Draft PEIR is unclear, and may underestimate impacts. For example, page 3.2-34 states that the GHG calculations are presented in Appendix B, however they are not included in the published appendix. These calculations should be presented in either the Recirculated or Final PEIR. Without these calculations, it is difficult to determine the project related GHG emissions. For example, on page 3.2-34 the Lead Agency states that the worst case construction year GHG emissions will be 9,104 MT CO_2e, however on page 3.2-35 an estimate of 47 MT/yr CO_2e is presented assuming a 30 year amortization of construction emissions. As 9,104 MT CO_2e is only one year of emissions, and construction is projected to last at least 15 years, the 47 MT/yr CO_2e value appears to be considerably underestimated. D5

The operational GHG emissions are also difficult to evaluate based on the presentation in the Draft PEIR. Conflicting facility operational emissions present an unclear sum of total facility emissions (e.g., 9,057/yr MT CO_2e on page 3.2-34 vs. 5,175 MT/yr CO_2e on page 3.2-35). Also, as the facility will use 5.9 MW of electricity, including either 2.7 or 1.5 MW of grid-based electricity (depending on whether a new cogeneration facility is built), the GHG emissions from this electricity generation need to be clearly presented in the Recirculated or Final PEIR.

[2] http://www.aqmd.gov/ceqa/handbook/GHG/GHG.html
[3] http://www.arb.ca.gov/cc/localgov/ceqa/ceqa.htm

Pursuant to Public Resources Code Section 21092.5, please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final Environmental Impact Report. The SCAQMD staff would be happy to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,

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

Attachment

IM:KM:GM

RVC100618-03
Control Number

Comment Letter E

WARREN D. WILLIAMS
General Manager-Chief Engineer

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RIVERSIDE COUNTY FLOOD CONTROL AND WATER CONSERVATION DISTRICT

July 29, 2010

Emailed This Date To: whuang@riversideca.gov

Mr. Warren Huang
City of Riverside
Public Works Department
3900 Main Street
Riverside, CA 92522

Dear Mr. Huang:

Re: Notice of Availability of a Draft Environmental Impact Report for the City of Riverside's Integrated Master Plan for Wastewater Collection and Treatment Facilities

This letter is written in response to the Notice of Availability (NOA) of a Draft Environmental Impact Report (DEIR) for the City of Riverside's Integrated Master Plan for Wastewater Collection and Treatment Facilities. The proposed project consists of a project-level analysis for the construction and operation of a 52.2 million gallons per day (mgd) capacity Regional Water Quality Control Plant (RWQCP), a program-level analysis of the construction and operation of a 55.2 mgd and 63.9 mgd capacity RWQCP facility, and a program-level analysis of updates to the existing sewer collection system. The project is located within the city of Riverside, Riverside County. The 52.2, 55.2, 63.9 mgd capacity RWQCP facility would be located within the existing RWQCP site area of approximately 106 acres generally bounded on the north side by the Santa Ana River, on the south side by Jurupa Avenue, on the west side by Van Buren Boulevard and on the east side by Peyton Road. The updates to the collection system will be located throughout the city.

The District is providing the following comments/concerns:

1. The project site is located within the limits of the Santa Ana River Special Flood Hazard Area (SFHA) and Regulatory Floodway as shown on the currently effective digital Flood Insurance Rate Map (dFIRM) published by the Federal Emergency Management Agency (FEMA) pursuant to the National Flood Insurance Program (NFIP) [Panel No. 60065C0705G; eff. August 28, 2008]. Additionally, the site is shown as being subject to inundation in the event of a catastrophic failure of the Army Corps of Engineers' Seven Oaks Dam located in San Bernardino County [Dam Failure Inundation Map; Seven Oaks Dam Emergency Action Plan, USACOE]. E1

2. Although Section 7.1 of the DEIR states that the site is protected from the "100-year flood" by an existing levee, it is clear from the currently effective dFIRM panel that the claimed 100-year flood protection provided by the levee is not currently recognized by FEMA and, therefore, the floodplain management requirements of the NFIP [44 CFR 60] and Chapter 16.18 of the City of Riverside Municipal Code apply to any proposed development activities occurring on this site. Of particular interest for this project are the NFIP and local regulatory requirements pertaining to alteration of a watercourse, increase in base flood elevations, notification of other agencies and development within an adopted regulatory floodway. E2

3. Inasmuch as the County of Riverside is directly affected by floodway encroachments and changes to the base flood elevations along the Santa Ana River in the vicinity of this project, we would encourage the City to consider the cumulative impact of both its proposed project and previous activities on the site, and adopt appropriate mitigation measures. As we discussed during our previous meeting concerning FEMA certification of the existing levee, the District is about to embark on a restudy of the Santa Ana River SFHA and Regulatory Floodway to incorporate changes in hydrology (due to the construction of the Seven Oaks Dam project) and updated topography. We would certainly appreciate the City's active support and assistance in this endeavor. E3

Thank you for the opportunity to review the DEIR. Any further questions concerning this letter may be referred to Kahlil Amin at 951.955.5418 or me at 951.955.1233.

Very truly yours,

Mark H. Wills

MARK H. WILLS
Chief of Regulatory Division

c: City of Riverside, Public Works Department
Attn: Tom Boyd
ec: Riverside County Planning
Attn: Kathleen Browne
Dale Anderson

KAA:mcv
P8\132532

Comment Letter F

DIRECTORS
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ORANGE COUNTY WATER DISTRICT
ORANGE COUNTY'S GROUNDWATER AUTHORITY

OFFICERS
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KATHRYN L. BARR

First Vice President
PHILIP L. ANTHONY

Second Vice President
JAN DEBAY

General Manager
MICHAEL R. MARKUS, P.E.

July 20, 2010

Warren Huang
City of Riverside
3900 Main Street, 3rd Floor
Riverside, CA 92522

Dear Mr. Huang:

Subject: Integrated Master Plan for Wastewater Collection and Treatment Facilities Draft Program Environmental Impact Report, June 2010 (State Clearinghouse No. 2009041054)

The Orange County Water District (OCWD) appreciates the opportunity to submit comments on the Draft Program EIR for the City of Riverside Integrated Master Plan for Wastewater Collection and Treatment Facilities.

OCWD manages the Orange County Groundwater Basin. Water produced from the basin is the primary water supply for approximately 2.5 million residents in Orange County. OCWD maintains and operates facilities in the cities of Anaheim and Orange to recharge Santa Ana River water into the groundwater basin. Santa Ana River baseflows and stormflows provide the majority of the water supply used to recharge the basin.

The Draft Program EIR project objectives listed in the Executive Summary differ from those listed in Chapter 2 on page 2-2. One of the objectives that only appears in Chapter 2 is to "Divert more treated water to the Recycled Water Program." The rest of the document evaluates the potential environmental impacts of the proposed construction of new facilities related to the wastewater treatment plant. It appears that diversion of recycled water is neither part of this proposed project nor is evaluated as part of this environmental report. Therefore, the proposed project does not include facilities related to the recycled water program. Please clarify that this assumption is correct. F1

PO Box 8300
Fountain Valley, CA 92728-8300
18700 Ward Street
Fountain Valley, CA 92708
(714) 378-3200
(714) 378-3373 fax
www.ocwd.com

OCWD appreciates the opportunity to participate in the environmental review process for the Integrated Master Plan for Wastewater Collection and Treatment Facilities. If you have any questions regarding our comments, please contact Greg Woodside at gwoodside@ocwd.com or 714-378-3275.

Sincerely,

Michael R. Markus, P.E.
General Manager

Comment Letter G

RIVERSIDE COUNTY FIRE DEPARTMENT

IN COOPERATION WITH
THE CALIFORNIA DEPARTMENT OF FORESTRY AND FIRE PROTECTION

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

PROUDLY SERVING THE UNINCORPORATED AREAS OF RIVERSIDE COUNTY AND THE CITIES OF:

BANNING
BEAUMONT
CALIMESA
CANYON LAKE
COACHELLA
DESERT HOT SPRINGS
INDIAN WELLS
INDIO
LAKE ELSINORE
LA QUINTA
MENIFEE
MORENO VALLEY
PALM DESERT
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RANCHO MIRAGE
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DISTRICT 5

July 16, 2010

City of Riverside, Public Works department
Mr. Warren Huang
5950 Acorn Avenue
Riverside, CA 92504

RE: Integrated Master Plan for Wastewater Collection and Treatment Facilities, Draft Environmental Impact Report SCH Number 2009041054

Dear Mr. Huang,

Thank you for providing the Riverside County Fire Department the opportunity to review the Draft Environmental Impact Report for the Integrated Master Plan for Wastewater Collection and Treatment Facilities.

With respect to the referenced project, the Riverside County Fire Department has no further comments. The project is located outside the Riverside County Fire Department's jurisdiction. G1

If I can be of further assistance, please feel free to contact me at (951) 940-6349 or e-mail at jason.neumann@fire.ca.gov

Sincerely,

Jason Neuman
Fire Captain
Strategic Planning Bureau

Comment Letter H

SOBOBA BAND OF LUISEÑO INDIANS
EST. JUNE 19, 1883

July 22, 2010

Attn: **Warren Huang**
City of Riverside, Public Works Dept.
3900 Main Street
Riverside, CA 92522

Re: Notice of Availability DRAFT (EIR) for the Integrated Master Plan for Wastewater Collection and Treatment Facilities for the City of Riverside, California (SCH NO. 2009041054)

The Soboba Band of Luiseño Indians appreciates your observance of Tribal Cultural Resources and their preservation within the amendment to the County of Riverside General Plan. We have carefully reviewed the revised General Plan, comments made by the General Plan Advisory Committee, and revisions made by the Riverside County Counsel. After this review we have concluded that there are definite concerns regarding cultural resource preservation policies and procedures. Below is a list of requests as well as comments to the revised General Plan.

Soboba Band of Luiseño Indians is requesting the following:

1. **Government to Government** consultation in accordance to SB18. The transfer of information to the Soboba Band of Luiseno Indians regarding the progress of this project should be done as soon as new developments occur and in the earliest stages possible. H1
2. Soboba Band of Luiseño Indians continues to be a consulting tribal entity for this project. H2
3. Please review and honor the comments by the Soboba Band of Luiseno Indians and revisions to General Plan Amendment 1083 (Please see the attachment) H3

Sincerely,

Joseph Ontiveros
Cultural Resource Director
Soboba Band of Luiseno Indians
P.O. Box 487
San Jacinto, CA 92581
Phone (951) 654-5544 ext. 4137
Cell (951) 663-5279
jontiveros@soboba-nsn.gov