



Inland Empire Waterkeeper

Advocacy • Education • Restoration • Enforcement

August 5, 2008

Western Municipal Water District
Attn: Jack Safely
450 Alessandro Blvd.
Riverside, CA 92508

RE: Riverside-Corona Feeder Pipeline Realignment, NOP Public Comments

Dear Mr. Safely,

Thank you for including Inland Empire Waterkeeper in your NOP distribution list to review the proposed realignment of the Riverside-Corona Feeder pipeline. We have provided some initial comments below, and look forward to reviewing the Supplemental Program EIR as well. Our mission is focused on the water quality of the Santa Ana River Watershed, so in this case we are concerned with impacts primarily to the river, the people who enjoy it, its native inhabitants, and tributaries:

1. Section D, No. 1: Concerned that none of the three remaining fish endemic to the river are mentioned as impacted by the pipeline: Santa Ana Sucker (federally threatened with no critical habitat), Arroyo Chub (State Species of Special Concern but qualifies for State-Threatened) or the Santa Ana Speckled Dace (State Species of Special Concern but qualifies as State-endangered).
2. Section D, No. 3: Just a matter of clarification – California Dept. of Fish and Game is encouraging everyone to stop using the term, “blue-line stream” because it is no longer accurate. Many jurisdictional creeks, streams, vernal pools and other wetland areas are not depicted on topographic maps.
3. Section H, No. 5: Will the micro-tunneling process generate discharges? If so, what kind, where will it go, and will that interfere with current TMDL programs? How about equipment traffic?
4. Section H, No. 6: The section of river where the pipeline would be placed is frequented by swimmers, families and outdoor enthusiasts year-round. How will their rightful interests be protected during construction? Also, which tributaries will be impacted by this project?

5. Section H, No. 10: It is not clear how deep the pipeline will be under the river, nor the pipe's diameter. Periodically, the Santa Ana River will have tremendous flows and either scour or bury sections of the floodplain. For example, the SARI line is often exposed due to the river changing course.

6. General: What sort of ongoing maintenance will be performed by WMWD? It would be good to know if ongoing alterations to the river or its tributaries will be needed to maintain the pipeline.

7. General: It is curious that you would choose this new alignment as superior to the original proposal. Will there be clarification as to the reasoning behind this significant change? It is likely that this change will have unexpected ramifications elsewhere.

Please call if you have any questions, and you can list my name as our CEQA reviewer.

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