

April 22, 2009

Matt Straite  
County of Riverside  
4080 Lemon Street  
Riverside, CA 92502-1629

**RE: Comments on The Villages of Lakeview draft EIR (No. 471)**

Dear Matt:

Thank you for providing easy access to the entire draft EIR for our review and comment. Our focus was primarily on the Hydrology/Water Quality section, and the documents contained in appendices H and I. We realize this was an enormous undertaking involving many firms and specialties, so we extend our kudos to you and your staff. The idea of the specific plan is progressive and we look forward to seeing it evolve more “low impact development” principles. The purpose of our comments is to protect the water quality of the San Jacinto River Watershed.

1. Page 1.0-2 contains the following two sentences that suggest future CEQA will be needed as phases (or “villages”) are built: “Due to the size of THE VILLAGES OF LAKEVIEW Specific Plan, which is planned to provide housing for approximately 34,000 residents, some aspects of the project are necessarily programmatic. Therefore, implementing entitlements may require additional documentation to comply with CEQA.” We would like to know why a Program EIR was not prepared, and what this statement really means in terms of future CEQA documentation. Sections 15165 and 15168 of CEQA Guidelines suggest an approach that seems more suitable and allows for timely analysis as phases are built.

2. If the project will be built in phases, with long expanses of time between each, then will each phase meet water quality objectives to receiving waters? We are concerned the long-term, tract map-specific water quality measures that are more likely to perform as needed and stipulated by the Santa Ana Regional Water Quality Control Board will be totally up to future developers currently not involved in the planning process, and will not become a part of an organized plan for water quality protection. This plan of action suggests that treatment methods will be minimally coordinated and until such time they are built, the risk of pollution to the San Jacinto River and downstream water bodies could be great.

3. Please describe where construction-phase and post-development drainage from SWMM-modeled sub-catchment areas G-1000, G-1100, G-2000, and G-2100 will flow. No development should create a nuisance situation on private property, because the source of the nuisance flow would become liable for damages.

4. We are deeply concerned with Appendix F of the preliminary WQMP. The water quality reports prepared by Geosyntec suggest there will be a sand filter to provide final treatment for several pollutants; however, the WQMP designs the basin for treating only nutrients and pathogens. There are no design specifications for the sand filter, nor any indication of the media type. With the minimal specifications provided, we do not believe the “sand filter” will provide the necessary treatment for this development.

Sand filters are typically designed in one of three ways – the Delaware sand filter, the Austin sand filter or the Washington DC sand filter, each with a 6 to 10 foot elevation drop. Please describe how the selected sand filter media is expected to perform for the pollutants described in the Water Quality Technical Report. In addition, there are no BMP design specifications in the WQMP for the vegetated swales mentioned in the technical report.

5. The preliminary WQMP states:

There is no need for a soils report for the project regarding WQMP since the proposed regional water quality basin is not an infiltration basin. The regional WQ basin is an extended detention basin that incorporates a filtration system. The filtration system has an underground perforated pipe to convey the treated BMP runoff via the filtration system.

If the sub-surface perforated pipe conveys treated runoff, then one would assume it facilitates infiltration, because it is perforated. Please clarify this confusing statement and reconsider preparing a site-specific soils/geotechnical report if infiltration is indeed occurring.

6. Due to economies of scale, it is less costly to mass grade the entire area of development at the onset of the project. If this is the plan, we suggest that temporary detention basins be installed throughout and sized for a 10-year storm event.

7. In summary, additional permanent, treatment BMPs should be specified and clearly outlined for each phase of development to always protect the receiving waters from pollutants.

**Inland Empire Waterkeeper cannot support this plan of development as proposed.**

We have collaborated with many of the major builders throughout the region, particularly The Irvine Company over the past decade. Our goal is to achieve a sophisticated water quality management plan to ensure this project will not cause or contribute polluted runoff. Our comments should be considered constructive criticism of the project as presented. If we can come to an understanding, and we feel the water quality management plan is state-of-the-art, we will publicly support the plan through the entitlement process. Feel free to contact me directly with any questions or concerns at (714) 850-1965.

Sincerely,

A handwritten signature in black ink that reads "Garry Brown". The signature is written in a cursive, flowing style.

Garry Brown  
Executive Director