
Orange County Feeder Relining Project

Responses to Comments on Draft Initial Study

SCH # 2014081017



Metropolitan Report No. 1428

The Metropolitan Water District of Southern California

October 2014

COMMENTS AND RESPONSES

A draft initial study/mitigated negative declaration (IS/MND) for the Orange County Feeder Relining Project (Metropolitan Report No. 1428) was circulated for a 30-day public review period beginning on August 7, 2014, and ending on September 6, 2014. Three comment letters from public agencies and two letters from private individuals representing businesses were received and are included in this final MND.

LIST OF COMMENTERS

The public agencies and private citizens who submitted comments on the draft IS/MND during the public review period are listed below (arranged by date of correspondence).

A. Public Agencies

No.	Agency	Name	Date
1	Orange County Public Works	Hossein Ajideh	08/26/14
2	California Department of Transportation, District 12	Maureen El Harake	09/05/14
3	State Clearinghouse	Scott Morgan	09/08/14
4	City of Newport Beach	Patrick J. Alford	09/09/14

B. Businesses

No.	Business	Name	Date
1	C.J. Segerstrom & Sons	Grant Wilson	08/25/14
2	C.J. Segerstrom & Sons	Justin McCusker	08/26/14

Comment Letter A1



Memorandum

DATE: August 26, 2014
TO: The Metropolitan Water District of Southern California email: EPT@mwdh2o.com
FROM: Hossein Ajideh, Chief, OC Infrastructure Programs/OC Flood Support/Hydrology
SUBJECT: Notice of Intent to Adopt a Mitigated Negative Declaration for the Orange County Feeder Relining Project, The Metropolitan Water District of Southern California

In response to your request Hydrology Section of OC Infrastructure Programs reviewed the Notice for the proposed project and offers the following comments:

- A1-1 { 1. All proposed work of relining pipeline with mortar lining within Orange County Flood Control District (OCFCD) right-of-way will require encroachment permit from OC Public Works /County Property Permits section For information regarding permit application, please visit our web site <http://www.ocplanning.net/> . Technical reviews and approvals for the proposed work will be accomplished within the permit process.
- A1-2 { 2. All work within or adjacent to OCFCD's right-of-way and/or facility should be conducted so as not to adversely impact OCFCD facility and its structural integrity, hydraulic flow conditions, and accessibility.

If you have any questions regarding these comments, please contact me at (714) 245-4503.


 Hossein Ajideh

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Response to the August 26, 2014, Comment Letter from Orange County Public Works

Response to Comment A1-1

The commenter states that all work associated with the project that takes place within Orange County Flood Control District (OCFCD) right-of-way would require an encroachment permit from the OC Public Works/County Property Permits section. As described on page 1-30 of the Initial Study prepared for the project, the existing OCF is located primarily within existing street right-of-way. No construction work is proposed within OCFCD right-of-way. However, prior to relining, the existing OCF pipes would be dewatered and flushed, some of which would likely be released into OCFCD flood control channels and storm drain systems. Metropolitan will coordinate any construction work and release of water with OCFCD and will obtain any required Encroachment Permits for dewatering operations prior to dewatering activities. In the event that construction work takes place within OCFCD right-of-way, Metropolitan will seek any necessary permits required by the County.

Response to Comment A1-2

As described under Response to Comment A1-1 and in the Initial Study prepared for this project, no construction work is proposed within OCFCD right-of-way. OCFCD facilities are not anticipated to be affected by construction of the project. Coordination with OCFCD will take place prior to any construction work in the vicinity of OCFCD facilities, or any necessary Encroachment Permits will be obtained prior to any release of water into OCFCD facilities.

Comment Letter A2

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

EDMUND G. BROWN Jr., Governor

DEPARTMENT OF TRANSPORTATION

DISTRICT 12
 3347 MICHELSON DRIVE, SUITE 100
 IRVINE, CA 92612-8894
 PHONE (949) 724-2086
 FAX (949) 724-2592
 TTY 711
www.dot.ca.gov



*Serious drought.
 Help save water!*

September 5, 2014

Ms. Malinda Stalvey
 The Metropolitan Water District of Southern California
 Environmental Planning Team
 P.O. Box 54153
 Los Angeles, CA 90054-0153

File: IGR/CEQA
 SCH#: 2014081017
 Log #: 3956
 SR-55, SR-73, I-405

Dear Ms. Stalvey:

The California Department of Transportation (Caltrans) appreciates the opportunity to review and comment on **Draft Mitigated Negative Declaration (DMND) for the Orange County Feeder Relining Project**. The proposed project would reline approximately 9.5 miles of the 22-mile long, below-ground Orange County Feeder (OCF), which is the Metropolitan Water District of Southern California (Metropolitan) major water conveyance pipeline to Orange County. **Caltrans is a commenting and responsible agency** on this project. Caltrans has the following comments:

- A2-1 { Any work performed within Caltrans right-of-way (R/W) will require discretionary review and approval by Caltrans and an encroachment permit will be required for any work within the Caltrans R/W prior to construction. <http://www.dot.ca.gov/hq/traffops/developserv/permits/>
- A2-2 { A Traffic Control Plan or construction traffic impact study may be required prior to construction. The plans shall be prepared in accordance with Caltrans's *Manual of Traffic Controls for Construction and Maintenance Work Zones*. Traffic restrictions and pedestrian / bicycle detours may also need to be addressed. All work proposed within the State R/W requires lane and shoulder closure charts. All roadway features (e.g., signs, pavement delineation, roadway surface, etc.) within the State R/W must be protected, maintained in a temporary condition, and/or restored.

If you have any questions, please do not hesitate to call Leila Ibrahim at (949) 756-7827.

Sincerely,

MAUREEN EL HARAKE
 Branch Chief, Regional-Community-Transit Planning
 District 12

*"Provide a safe, sustainable, integrated and efficient transportation system
 to enhance California's economy and livability"*

Response to the September 5, 2014, Comment Letter from California Department of Transportation

Response to Comment A2-1

The commenter states that all work performed in Caltrans right-of-way would require discretionary review and approval by Caltrans and an encroachment permit would be required prior to construction. Metropolitan will coordinate with Caltrans on construction work that would occur within or adjacent to Caltrans right-of-way. All necessary permits, including Caltrans issued encroachment permits would be obtained prior to commencing construction work.

Response to Comment A2-2

The commenter states that a traffic control plan or construction traffic impact study may be required prior to construction and that such plans should be prepared in accordance with Caltrans' *Manual of Traffic Controls for Construction and Maintenance Work Zones*. As described in the Initial Study, and adopted into of the Mitigation Monitoring and Reporting Program, Mitigation Measure TRAN-1 would require Metropolitan to develop a construction traffic control plan prior to the start of construction. TRAN-1, as described on page 3-73 of the Initial Study, is as follows:

TRAN-1

Metropolitan will coordinate with Orange County and the cities of Santa Ana, Costa Mesa, and Newport Beach to develop a construction traffic control measures and procedures prior to the start of construction. Measures to reduce temporary construction traffic and transportation impacts on city streets may include, but not be limited to, the following:

- Develop traffic control plans in coordination with local jurisdictions. The traffic control plan shall be implemented and revised, as necessary and applicable.
- Provide advance written notification of construction activities to residences and businesses around the construction site. The notification will include a brief overview of the proposed project and its purpose as well as the proposed construction activities and schedule. It also will include the name and contact information for the Metropolitan project manager or representative responsible for resolving any traffic issues.
- Identify travel routes and establish optimal arrival and departure times to minimize conflicts with residents, schools, and businesses.
- Employ provisions to detour pedestrians and bicyclists for project impacts near/on sidewalks and bike lanes.
- Implement safety measures, signs, flaggers, cones, signage, and advance notice as appropriate.
- Cover all open trenches when not in use or at the end of each work day, as appropriate.

Development of these construction traffic controls would be coordinated with Caltrans as well as the Cities of Santa Ana, Costa Mesa, Newport Beach, and Orange County.

Comment Letter A3



EDMUND G. BROWN JR.
GOVERNOR

STATE OF CALIFORNIA
GOVERNOR'S OFFICE of PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT



KEN ALEX
DIRECTOR

September 8, 2014

Malinda Stalvey
Metropolitan Water District of Southern California
P.O. Box 54153
Los Angeles, CA 90054-0153

Subject: Orange County Feeder Relining Project
SCH#: 2014081017

Dear Malinda Stalvey:

A3-1 { The State Clearinghouse submitted the above named Mitigated Negative Declaration to selected state agencies for review. The review period closed on September 5, 2014, 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

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044
(916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

**Document Details Report
State Clearinghouse Data Base**

SCH# 2014081017
Project Title Orange County Feeder Relining Project
Lead Agency Metropolitan Water District of Southern California

Type MND Mitigated Negative Declaration
Description The proposed project would reline approximately 9.5 miles of the Orange County Feeder (OCF). The OCF pipeline is a welded steel pipeline, approximately 36 inches in diameter. It has bell-and-spigot joints and is lined with CTE to protect the inside of the pipeline. The CTE liner is blistering or peeling away from the internal steel face of the pipeline and exposing the pipeline to corrosion. The proposed project would remove the existing CTE liner, reline the pipeline with cement mortar lining, and install bonding bars between the pipe sections to enable the installation of an effective cathodic protection system for corrosion prevention. Maintenance and replacement of worn or outdated components (i.e. above-ground air release valves, vacuum valves) would also be completed as part of this project.

Lead Agency Contact

Name Malinda Stalvey
Agency Metropolitan Water District of Southern California
Phone 213 217 5545 **Fax**
email
Address P.O. Box 54153
City Los Angeles **State** CA **Zip** 90054-0153

Project Location

County Orange
City Santa Ana, Costa Mesa, Newport Beach
Region
Lat / Long 33° 41' 2.35" N / 117° 53' 7.34" W
Cross Streets Bristol Street, Jamboree Avenue
Parcel No. various
Township

Range	Section	Base
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Proximity to:

Highways Hwy 22, 5, 55, 405, 73
Airports John Wayne Int'l
Railways Metrolink
Waterways Newport Bay, San Diego Creek
Schools Various
Land Use Various - industrial, residential

Project Issues Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Coastal Zone; Flood Plain/Flooding; Geologic/Seismic; Noise; Public Services; Recreation/Parks; Soil Erosion/Compaction/Grading; Toxic/Hazardous; Traffic/Circulation; Water Quality; Landuse; Other Issues

Reviewing Agencies Resources Agency; California Coastal Commission; Department of Fish and Wildlife, Region 5; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; Caltrans, Division of Aeronautics; California Highway Patrol; Caltrans, District 12; Air Resources Board; Regional Water Quality Control Board, Region 8; Department of Toxic Substances Control; Native American Heritage Commission; Public Utilities Commission

Date Received 08/07/2014 **Start of Review** 08/07/2014 **End of Review** 09/05/2014

Response to the September 8, 2014, Comment Letter from the State Clearinghouse

Response to Comment A3-1

Confirmation of receipt of the Draft Initial Study by the State Clearinghouse is acknowledged. As stated by the letter, the review period closed on September 5, 2014. No state agencies submitted comments by the end of the review period; therefore, no further response is needed.

Comment Letter A4

Dear Ms. Stalvey,

Please forgive the lateness of these comments. The City of Newport Beach has reviewed the Notice of Intent to Adopt a Mitigated Negative Declaration for the Orange County Feeder Relining Project and has the following comments:

The integrity of the Metropolitan Water Districts (MWD) OC Feeder line is very important to the City of Newport Beach water reliability. Twenty-eight percent (28%) of the City's yearly demand is fed from this line. The City's water operations will be impacted by the work being completed on this project.

A4-1 {

The scope details the use of NPDES permitting for all discharge of water from the line. However, it does not mention where this water will be discharged. This water will be put into the City's storm drain system eventually making its way to the Bay and Ocean. MWD disinfects with monochloramines which is a combination of both chlorine and aqueous ammonia. The MND does not detail how these chemicals will be removed from the water before it hits the Bay or Ocean. The amount of water being discharged are reflected in the totals from the following Reachs that are in Newport Beach:

- Reach 3 - 728,591 gallons
- Reach 4 - 577,186 gallons
- Reach 4A - 24,875 gallons

The City would like to know where MWD intends to discharge this water, and at what rate (GPM). The City has some customers downstream from these locations that could be heavily impacted. For example, Big Canyon Country Club is just downstream from Reach 4 and 4A. Storm water enters onto their course from underneath Macarthur Blvd. In the past when we have discharged water from Big Canyon Reservoir, we have limited our discharge rate to 500 Gallons Per Minute.

The Metropolitan Water District of Southern California

A4-2 { Also, the scope does not detail how the City's service connections with MWD will be affected. It states that work will be completed from Reach to Reach, but does not stipulate how or if downstream connections will be affected. A detailed MWD operations plan with service connections to be impacted including timetables should be provided.

A4-3 { The City is also concerned that temporary construction associated with Reach III and Reach IV could impact new landscape plantings on Bristol South and Jamboree. The City would appreciate coordination with the City's Public Works Department on the location of construction and construction storage areas.

A4-4 { Also, Bristol South is a moratorium street (newly paved street with no cutting permitted) and any trenching or damaging to the street will require extensive pavement repair. Bristol South is also the City's right-of-way any construction activity will require applicable permits from the City (i.e. Encroachment permits or temporary street closure permits).

A4-5 { Table 1-5 (Surrounding Land Uses) does not identify the General Commercial and General Commercial Office land uses in the City of Newport Beach on the south side of Bristol Street South (Reach 3) nor the General Commercial use of the Fletcher Jones Motorcars property at 3300 Jamboree Road (Reach 4).

A4-6 { The City would like more detailed information on the extent of construction activities associated with following new excavation points in determine potential impacts to City improvements, residential areas, and local business:

Reach 3

- Station 1862+88
- Station 1877+88
- Station 1893+96
- Station 1902+00

Reach 4

- Station 1916+50
- Station 1933+65
- Station 1985+22
- Station 1992+50
- Station 2003+00
- Station 2013+13

Reach 4a

- Station 2050+01

A4-7 { Finally, the City appreciates that Mitigation Measure NOI-1 provides advance written notification of construction activities to residences and businesses around the construction site. The City would like to add that this mitigation measure should include cooperation with local governments at the earliest opportunity in order to facilitate coordination of construction activities with the City, homeowners associations, community associations, and impacted businesses.

Thank you,

Patrick J. Alford | Planning Program Manager
 City of Newport Beach | Community Development Department | Planning Division
 100 Civic Center Drive | Newport Beach, CA 92660
 (949) 644-3235 | (949) 644-3229 | palford@newportbeachca.gov

Response to the September 9, 2014, Comment Letter from the City of Newport Beach

Response to Comment A4-1

The commenter requests more information related to the location of water discharges from Reaches 3, 4, and 4a as well as the discharge rates for these releases. Metropolitan has an existing National Pollutant Discharge Elimination System Permit from the Santa Ana Region Water Quality Control Board (Permit No. R8-2009-003, NPDES No. CAG998001) for discharges to surface waters, including estuarine and ocean waters, within the Santa Ana Region, and de minimis discharges to Newport Bay and San Diego Creek watershed. The permit specifies dechlorination measures for potable water discharges and other dewatering requirements. As stated on page 1-31 of the Initial Study for the project, Metropolitan will obtain necessary permits prior to any release of water for any other discharge requirements (including the Santa Ana RWQCB and OCPW).

The commenter states that Metropolitan disinfects with monochloramines and wants to know how these chemicals would be removed from the water before it hits the bay or ocean. Metropolitan follows industry standard practices for dechlorinating discharges that flow to surface waters. As required by the Santa Ana RWQCB permit and the OCFCD requirements, and following practices set forth in the American Water Works Association (AWWA) Best Management Practices (BMP) Manual for Drinking Water System Releases, Metropolitan uses sodium thiosulfate, a colorless, transparent crystal, which when mixed with chlorinated water, acts as a dechlorination agent, and is converted to sodium salts that are non-toxic to aquatic species.

As described in Response to Comment A1-1 for this project, discharge water would be released into OCFCD flood control channels and storm drain systems. For reaches 3 and 4, the water would be dechlorinated prior to discharge into OCFCD facilities that eventually lead to the Newport Back Bay. There are also many potential locations for water discharge from existing Metropolitan-owned blow-off and pump well facilities. In the process of applying for permits for the project from the City of Newport Beach, Metropolitan will provide dewatering plans for the City's review, if required.

There are two potential discharge locations in Reach 4a. Water would be released onto the Big Canyon Country Club golf course via sheetflow using a pump-well at approximate station 2103+13 and/or a blow-off facility at approximate station 2076+40. Metropolitan will adhere to a discharge rate of 500 gallons per minute at either of these locations and will coordinate with the Big Canyon Country Club prior to any discharge of water.

Response to Comment A4-2

The commenter states that information about downstream service disruptions should be addressed. It is not anticipated that downstream service connections would be affected by construction of the project. During final design, Metropolitan will coordinate with its member agency, the Municipal Water District of Orange County (MWDOC), and the City of Newport Beach, to determine appropriate measures to avoid any service interruptions.

Response to Comment A4-3

The commenter raised concern about new landscape plantings on Bristol South and Jamboree. Metropolitan will continue to coordinate with the City of Newport Beach during final design on construction schedule, construction storage areas, and excavation locations. Any landscape plantings that are damaged during construction would be replaced in kind.

Response to Comment A4-4

The commenter states that Bristol South is a moratorium street and that any pavement removed would require extensive repair. The commenter also states that applicable permits would be required by the City of Newport Beach for any work done within city right-of-way. As described under Response to Comment A3-3, Metropolitan will coordinate with the City's Public Works

Department on excavation site and staging area locations. Metropolitan will also comply with the City's moratorium, and all applicable permits required by the City will be obtained prior to any work taking place within City right-of-way.

Response to Comment A4-5

The commenter states that Table 1-5 does not identify commercial land uses along South Bristol Street. Please note that Table 1-5 does not identify many land uses and is only intended to identify major land uses. Commercial land uses along Bristol South are accounted for in the analysis and identified throughout the Initial Study on pages 3-1, 3-3, 3-38, and shown in Figure 1-4.

Response to Comment A4-6

The commenter requests additional information on construction activities within Reaches 3, 4, and 4a. As described under Response to Comments A3-3, Metropolitan will coordinate with the City during final design on planned construction activities, replacement of landscape plantings, and business access for the described reaches. As stated in the Initial Study for the project on page 3-74 and 4-3, Metropolitan will develop a traffic control plan in coordination with the City prior to the start of construction.

Within Reach 3, construction includes approximately 4,100 linear feet of relining within the City of Newport Beach with four excavation sites located on the east side of Bristol Street, adjacent to the landscaped areas. Business access would remain unaffected by this work. Construction work along this stretch of Bristol Street would last approximately one month.

The northern most part of Reach 4 would lie within the Fletcher Jones Motorcars dealership. A portion of the reach occurs within the Coastal Zone, while the remainder of the reach is mostly residential. Construction of this segment would take approximately 2.5 months. Reach 4a is a short reach, approximately 300 feet long. Reach 4a would be accessed through a manhole on a public utility road. Reach 4a relining would be completed during a normal Metropolitan shutdown, which is approximately 7-10 days in duration.

Response to Comment A4-7

The commenter requests that Mitigation Measure NOI-1 include early cooperation with local governments to facilitate coordination with homeowners, community associations, and businesses. As stated in the Initial Study on page 3-60 under Mitigation Measure NOI-1, advance written notification of construction activities to residences and businesses would be provided. Metropolitan will coordinate with the City of Newport Beach on any construction activities to ensure that proper notification is provided to interested parties.

Comment Letter B1

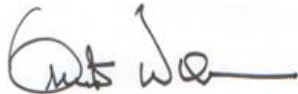
From: Grant Wilson
Sent: Monday, August 25, 2014 2:16 PM
To: Vazquez, Sal (svazquez@mwdh2o.com)
Cc: Justin McCusker; FARIBA.FAZELI@costamesaca.gov
Subject: OC Feeder Relining Site visit-Costa Mesa & South Coast Plaza

Salvador, Nice to meet you and your staff Wednesday August 20th to discuss the subject projects impact to South coast Plaza and our surrounding properties operations. A few of the issues discussed are as follows:

- B1-1 { 1. Late January 2016 start of the relining work appears to be beyond our busy Holiday shopping season (November 1st thru December 31st) however from January 1st thru February 15th an equally busy period will occur for Lunar New Year events. Consideration should be given to work starting after February 15th.
- B1-2 { 2. Working hours, considering the volume of traffic north bound on Bristol street during the daytime hours, the project may go faster and less impact to South coast plaza if night work between the hours of 10pm and 5am is an option, of course the hours and any lane closures will have to be reviewed and approved by the City of Costa Mesa after traffic control plans are submitted for the project.
- B1-3 { 3. Lastly, what we did not discuss at the site visit was noise particularly if work is performed at night. The Westin Hotel would be impacted if the noise levels are excessive.

If you have any questions please contact me.

Thanks



Grant Wilson
Director of Construction
C.J. Segerstrom & Sons
3315 Fairview Road
Costa Mesa, CA 92626
wilsong@southcoastplaza.com
Direct (714) 438-3276
Fax (714) 546-9835

Response to the August 25, 2014, Comment Letter from Grant Wilson

Response to Comment B1-1

The commenter expresses that the proposed project schedule is favorable as it avoids the busy holiday shopping season; however, the commenter asks that consideration be given to beginning construction work after February 15th to avoid conflicts with Lunar New Year events that take place between January 1st and February 15th. Construction work would be coordinated with the City of Costa Mesa. As described in the Initial Study prepared for the project, a construction traffic control plan would be prepared for the project as required by mitigation measure TRAN-1. This plan would include traffic controls to accommodate heavy traffic during busy periods at the South Coast Plaza and advance notification of construction activities so that appropriate planning may be done. Metropolitan, in consultation with the City of Costa Mesa, will consider adjusting the construction schedule to avoid busy shopping periods to the greatest extent possible.

Response to Comment B1-2

As described in the Response to Comment B1-1, a traffic control plan would be prepared for the project as required under mitigation measure TRAN-1. Nighttime or 24-hour construction may be necessary for some locations. Noise variances would be obtained from the City of Costa Mesa if nighttime work is required.

Response to Comment B1-3

The commenter expresses concern over noise impacts at the Westin Hotel if nighttime work is anticipated. As described in the Initial Study for the project, mitigation measure NOI-1 would implement noise control measures during construction to reduce any potential construction noise impacts to the greatest extent possible. Some of these measures would include development of a noise control plan with the local jurisdiction, employment of construction methods and equipment that will provide the lowest level of noise impact, use of temporary noise barriers when necessary, and coordination and advance notification of construction activities with the City of Costa Mesa and local businesses, including the Westin Hotel.

August 26, 2014

The Metropolitan Water District of Southern California
Environmental Planning Team
P.O. Box 54153
Los Angeles, CA 90054-0153

Dear Ms. Stalvey and Mr. Vasquez:

B2-1 { As a follow-up to Grant's message below, I want to thank MWD staff for taking the time out of your busy schedules to meet with Grant on August 20th in Costa Mesa. It appears from the materials provided to us earlier this month, as well as the photos/power point slides, that the majority of the work on the two Bristol Street sites between Sunflower and the I-405 will be done in a manner to avoid blocking access (ingress/egress) to South Coast Plaza, as well as the properties (Westin South Coast Plaza, Segerstrom Center for the Arts and Offices of South Coast Plaza) located on the easterly side of Bristol. We are appreciative of your sensitivity to traffic impacts for one of the busiest stretches of road in all of Orange County.

The Segerstrom Family and their affiliated companies have a long history supporting innovative water infrastructure projects in Orange County, including the development of the Green Acres reclaimed water system at the Orange County Water District (OCWD) during the time when Henry T. Segerstrom served on OCWD's board of directors. We understand how critically important reliable water infrastructure systems are to both the residents and businesses in our region. To that end, for decades The Segerstrom Family provided, in collaborative partnership with Mesa Consolidated Water District (MCWD), a parcel of land for MCWD to develop a well-site for the benefit of the larger community.

However, while we support MWD's mission and stated goals related to water reliability, especially during this prolonged drought, the OC Feeder Relining Project also has areas of significant concern that will still need to be addressed when MWD ultimately moves forward.

As indicated in our phone conversations and in Grant's message below, we formally request:

- B2-2 { 1. The construction schedule for the OC Feeder Relining Project to avoid the busiest times of the year for South Coast Plaza and the adjacent properties. Specifically, the Christmas and Lunar New Year shopping and event festivities that stretch from November 1st – February 15th. It would be best to have construction activities completely avoid this 3.5 month time period (November, December, January and first half of February) and commence after February 15th.
- B2-3 { 2. An over-night construction scheduled for the OC Feeder Relining Project. Bristol Street in Costa Mesa, between Sunflower and the I-405 have significant traffic volume all year and in the evenings, beyond traditional peak periods. However, we strongly recommend that Metropolitan Water District conduct all construction activities between 10 PM and 5 AM to avoid traffic impacts related to the busiest traffic periods, the morning and afternoon peak commute times.

B2-4 { Finally, as noted below by Grant, it will be important to coordinate with the Westin South Coast Plaza and its General Manager, Mike Hall regarding potential noise impacts for the Westin's overnight guests. Mr. Hall is copied on this message.

It is my understanding that this email correspondence can/will be entered as an official comment letter on behalf of C.J. Segerstrom & Sons and South Coast Plaza. To that end, I do not plan to follow-up with a hard copy to Ms. Stalvey unless you indicate otherwise. Please confirm that this is acceptable.

Thank you again for your early outreach and flexibility, as well as consideration of our concerns related to the OC Feeder Relining Project. We look forward to working with you and receiving updates as the Project moves forward.

Sincerely,

Justin McCusker

Justin McCusker
C.J. Segerstrom & Sons
3315 Fairview Road
Costa Mesa, CA 92626
714-546-0110 – Office
mccuskerj@southcoastplaza.com

Response to the August 26, 2014, Comment Letter from Justin McCusker

Response to Comment B2-1

The commenter thanks Metropolitan for meeting with C.J. Segerstrom & Sons to discuss the project. The commenter states that they accept and understand the need for the Project. The commenter provides information regarding collaboration with Mesa Consolidated Water District for the development of a well site to benefit the larger community. The commenter also notes that there are areas of concern that need to be addressed before the project should move forward. Responses to these concerns are provided in responses to Comments B1-1 through B1-3.

Response to Comment B2-2

Please see response to Comment B1-1

Response to Comment B2-3

Please see response to Comment B1-2

Response to Comment B2-4

Please see response to Comment B1-3