



THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA

Office of the General Manager

December 1, 2014

Via E-Mail and Regular Mail

Ms. Christina Taylor
Orange County Public Works/Orange County Development Services
300 North Flower Street
Santa Ana, CA 92702-4048

Dear Ms. Taylor:

Revised Notice of Preparation and Initial Study, The Preserve at San Juan

The Metropolitan Water District of Southern California (Metropolitan) reviewed the revised Notice of Preparation and Initial Study for a Draft Environmental Impact Report (EIR) for The Preserve at San Juan (Project). Orange County is acting as the Lead Agency under the California Environmental Quality Act (CEQA) for this project. The Project proposes to construct approximately seventy-two residential homes on approximately 583 acres. The Project would include a new on-site roadway system and utility infrastructure (water storage tanks and distribution lines, septic tanks), approximately 24.5 acres of vineyards for open space, and improvements to Elsinore Valley Municipal Water District's (EVMWD) infrastructure system. The Project site is located in unincorporated Orange County and Riverside County near State Route 74, near the county borders. This letter contains Metropolitan's response to the Public Notice as a potentially affected public agency.

Metropolitan reviewed the Initial Study and determined that a majority of the proposed project is not within Metropolitan's service area. The proposed project site east of the Orange and Riverside County boundaries and north of Long Canyon Road is within Metropolitan's member agency, Western Municipal Water District (WMWD), service area boundaries. The remaining areas west of the county boundaries are within the ultimate service area of the Municipal Water District of Orange County (MWDOC), which is currently not within Metropolitan's service area. The unannexed areas, which include most of the area proposed for development, will need to be annexed to all public agencies for water service prior to receiving water service. Under Metropolitan's Administrative Code Section 3100, property outside of Metropolitan's service area requires annexation prior to water being served. Section 3104 (b) states, "water sold and delivered by the District shall not be used in any manner which intentionally or avoidably results in the direct or indirect benefit of areas outside the District including use of such water outside the District or use thereof within the District in substitution for other water used outside the District."

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Metropolitan is a responsible agency with respect to annexation and needs to be listed in the agency approval list for EIR discretionary actions. The Draft EIR also needs to include in the project description a brief statement on the proposed annexation to Metropolitan, WMWD, MWDOC and LAFCO, including water standby charges, ad velorum tax, and other required conditions for annexation. Then, in the appropriate impact section (e.g., water supplies or utilities), there needs to be an analysis of this proposed annexation so that Metropolitan and others can rely on the EIR for their own discretionary approvals. Specifically, annexation requests are required by each agency's Board of Directors, which has discretion to annex new territory into its existing service area. Metropolitan's Administrative Code Section 3100 describes the procedures and policies and is referenced on Metropolitan's website: www.mwdh2o.com. We encourage the county to work with Metropolitan, WMWD, MWDOC and LAFCO on general annexation procedures by contacting Ethel Young at (213) 217-7677.

Metropolitan requests that the county analyze the consistency of the proposed project with the growth management plan adopted by the Southern California Association of Governments (SCAG). Metropolitan uses SCAG's population, housing, and employment projections to determine future water demands. Development above these forecast provisions may increase demand on Metropolitan's resources and facilities beyond that anticipated.

Additionally, Metropolitan encourages projects within its service area to include water conservation measures (Metropolitan Administrative Code section 3107 and California Water Code section 13550 to section 13554). While Metropolitan continues to build new supplies and develop means for more efficient use of current resources, projected population and economic growth will increase demands on the current system. Water conservation, reclaimed water use, and groundwater recharge programs are integral components to regional water supply planning. Metropolitan supports mitigation measures such as using water efficient fixtures, drought-tolerant landscaping, and reclaimed water to offset any increase in water use associated with the proposed project.

We appreciate the opportunity to provide input to your planning process and look forward to receiving the Draft EIR and future environmental documentation on this Project. If we can be of further assistance, please contact Ms. Brenda S. Marines at (213) 217-7902.

Very truly yours,



Deirdre West
Manager, Environmental Planning Team

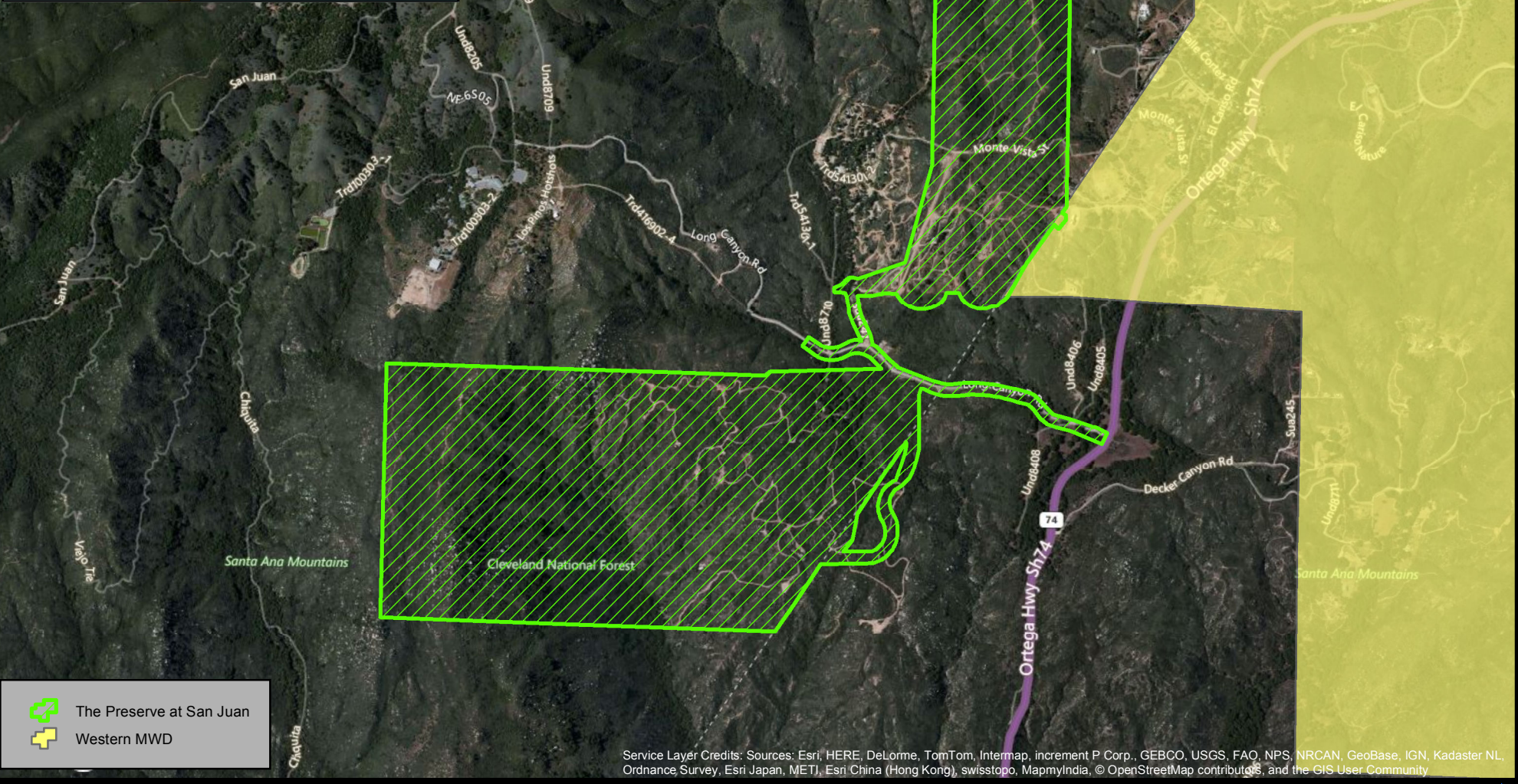
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(EPT Project No.20141115MIS)

Enclosure: Map

J:\Projects\Special_Requests\Brenda_Marines\GIS\The_Preserve_at_San_Juan.mxd [Printed 11/13/2014] Photography Date: Bing Prepared by: Tom Blecher (Geofitics & Mapping Team) Checked by: Brenda Marines Job#: GIS14-11-13



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- The Preserve at San Juan
- Western MWD

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