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Charles Landry  
Executive Director

April 10, 2013

SDU-3

Ms. Cathy Bechtel  
Riverside County Transportation Commission  
P.O. Box 12008  
Riverside, CA 92502

**RE: MID COUNTY PARKWAY RECIRCULATED DRAFT  
ENVIRONMENTAL IMPACT REPORT/SUPPLEMENTAL DRAFT  
ENVIRONMENTAL IMPACT STATEMENT**

Dear Ms. Bechtel:

The Western Riverside County Regional Conservation Authority (RCA) appreciates the opportunity to review and comment on the Recirculated Draft Environmental Impact Report/Supplemental Draft Environmental Impact Statement (RDEIR/SDEIS) for the Mid County Parkway Project.

The project proposes to improve a 16 mile route between Interstate 215 and State Route 79 generally following the existing Ramona Expressway in the cities of Perris and San Jacinto and in unincorporated Riverside County and would consist of a access controlled freeway. The RCA is submitting these comments on the RDEIR/SDEIS pertaining to the implementation and consistency of the project with the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP). The California Department of Transportation and the Riverside County Transportation Commission are both Permittees under the MSHCP and pursuant to the Implementing Agreement are responsible for ensuring all project approvals are consistent with the MSHCP goals and policies.

The RCA offers the following comments:

1. Figure 3.17.1 – Please note that areas shown as “San Jacinto Wildlife Area Additional Acquisition” were acquired in furtherance of MSHCP as an expansion of Core H and are considered MSHCP Additional Reserve Lands (ARL) managed by the State. The figure also doesn’t reflect RCA-owned ARL lands to the south in the Lakeview Mountains.

SDU-3-1

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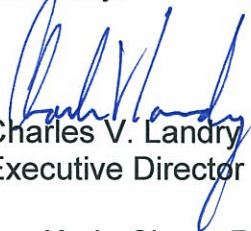
2. Table 3.17.C, Pages 3.17-26 through 30, NC-6 – For the purposes of MSHCP Riparian/Riverine mitigation (Determination of Biologically Equivalent or Superior Preservation, DBESP) impact areas generally include unvegetated streambed shown in the table as jurisdictional to CDFG in addition to marsh, riparian forest and riparian scrub. In addition the alkali grassland vegetation is part of the San Jacinto River floodplain riverine system. Please include these areas in the DBESP for the project. SDU-3-2
3. The analysis and measures included addressing wildlife connectivity (Pages 3.17-22 through 25, Appendix I, Attachment E) appropriately recognize the intended Core and Linkage connections expected under the MSHCP and how a large roadway can affect wildlife movement directly and indirectly. The information provided doesn't describe freeway fencing extent (entire right of way?), type of fencing or wildlife escape routes such as one way gates. Given the length of the project's frontage with existing and proposed conservation land how wildlife movement will be directed to the crossings and allowed to escape from inside the roadway fencing should be addressed. SDU-3-3
4. Page 3.17-11, 3.17-42, TE-2 - The document refers the SKR HCP impacts to Stephens kangaroo rat (SKR). The MSHCP does not provide take for SKR with the fee area of the SKR HCP. Take within the SKR HCP is not automatic for non-member agencies however, the project may be able to obtain take coverage through an agreement with the SKR HCP implementing authority, the Riverside County Habitat Conservation Authority (RCHCA). SKR take within the City of San Jacinto is available from the MSHCP since the City is not a member of the RCHCA. SDU-3-4
5. Page 3.17-42, 43 – It would be useful to include a discussion of the impacts from the Hemet to Corona CETAP corridor expected in the MSHCP (Pgs 7-40 through 7-45) in relation to impacts shown in Table 3.17.H, and the cell criteria in the cells that MCP is affecting. SDU-3-5
6. Page 3.17-47 - Please note that the MSHCP requires replacement of Public/Quasi Public lands if the loss will affect Reserve Assembly or function. We recommend this be addressed in the project's Joint Project Review package. SDU-3-6



7. Measure NC-3, Nesting Birds – Please include the width of the proposed buffer for nesting birds, if found. Buffer may have a range depending on the species. | SDU-3-7
8. AS-2, AS-3 - As noted in the Section 3.20.3.1 suitable burrowing habitat occurs over large areas of the project's temporary and permanent foot print and the focused burrowing owl surveys are not recent. Measures to address possible mitigation options (avoidance, eviction, active relocation) should be included in the Joint Project Review package. Burrowing owl measures can be addressed in the form of a DBESP even if impacts are not certain so mitigation options are clear and can be relied on over the extended construction time frame. We also request to be included in any active relocation of owls prior to construction to assist with the process. | SDU-3-8  
| SDU-3-9  
| SDU-3-10

We commend the effort undertaken to evaluate the project's consistency with the MSHCP and the potential impacts to Covered Species and look forward to working with you on the Joint Project Review and DBESPs.

Sincerely,



Charles V. Landry  
Executive Director

cc: Karin Cleary-Rose, USFWS  
Heather Pert, CDFW