

## **Browne, Kathleen**

**From:** Noland, Lance [LNoland@RIVCOEDA.ORG]  
**Sent:** Thursday, January 08, 2009 5:13 PM  
**To:** Browne, Kathleen  
**Cc:** English, Tina; Dasika, Rohini  
**Subject:** Comments: Mid-County Parkway Draft EIR

Hi Kathleen,

This e-mail is a follow-up to the voice mail message that I left for you yesterday morning. As you pointed out in the meeting yesterday on the 12<sup>th</sup> Floor, the Draft EIR for the Mid-County Parkway (the "proposed project") is an extremely large and unwieldy document. A number of impacts appear to have been inadequately addressed. This document has literally hundreds of pages and dozens of exhibits.

The proposed project will potentially impact the Redevelopment Agency for the County of Riverside (the "Agency")—more specifically the I-215 Corridor Project Area (Mead Valley and Lakeview/Nuevo sub-areas) and Redevelopment Project 1-1986 (El Cerrito / Temescal Canyon sub-area). However, specific impacts to the aforementioned sub-areas are generally unclear and very difficult to determine due to the inadequacy of the EIR exhibits (size) and the seeming absence of discussion of redevelopment in the Draft EIR. A considerable amount of time and funding has been committed by the County and the Agency to create the aforementioned project areas and implement effective redevelopment programs that eradicate blight, create jobs, promote business development and improve infrastructure and housing opportunities for residents living in both project areas. Therefore, notwithstanding the minimum requirements of the CEQA checklist, impacts to the County's redevelopment project areas need to be addressed in the EIR for the proposed project. While potential impacts to the El Cerrito Sports Park are discussed, they appear to have been discussed from the perspective of modification of the park rather than a modification of the proposed project.

The Agency has the following comments to make regarding the Draft EIR for the proposed project:

### El Cerrito Sports Park:

The El Cerrito Sports Park is located in Redevelopment Project 1-1986 and is a redevelopment funded public facility. The park is located in the core of the community of El Cerrito and is adjacent to a middle school and several hundred feet from a grammar school. The focus of this park is to provide regulation-size sports playing fields to the local community and surrounding area—primarily for area youth. The impacts to the park resulting from the proposed project appear to be somewhat brushed aside in the Draft EIR but appear to be substantial nonetheless. First, contrary to the implication of some the statements contained in Table 4.7: Evaluation of Net Harm after Mitigation, the plans for the park have been approved as originally proposed several years ago and the park is currently under construction. The park is not an idea in the planning stage; it is a reality. In Table 4.7, under the topic *Use Impacts by Alternative and Areas Used*, the following statement is made: "These alternatives [referring to project Alternatives 4, 5, 6, 7 and 9] **would remove landscaping, and the westernmost edges of three sports fields; the area used under all five alternatives represents approximately 8.9 percent of the total site for this planned park.**" Again, it is critical to

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understand that the sports fields are the primary focus of the park; impacts on their size could destroy their value as playing fields. Along with a reduction of the size of the park by almost 9-percent, the impact on the park playing facilities and the purpose of the park would be severe. Neither these impacts nor potential impacts on the Agency's financial investment in this facility have been thoroughly evaluated in the Draft EIR.

Moreover, Table 4.7, under the topic *Net Harm After Mitigation*, goes on to state in terms of project alternatives: "Alternatives 4, 5, 6, 7, and 9 would include continuation of existing coordination and consultation with the County of Riverside, including ongoing discussions with the County regarding minor modification to the planned layout of this park, to accommodate the minor use of land on the west side of the park for Alternatives 4, 5, 6, 7, and 9; **this would fully mitigate the impacts of the use related to the three sports fields. In summary, the harm to the park under Alternatives 4, 5, 6, 7, and 9 can be substantially reduced.**" [emphasis added] The Agency disagrees with this conclusion. First, as has been stated previously, the park facility plan has not been "modified" and is currently under construction. Second, "ongoing discussions regarding minor modification to the planned layout of the park," assuming that they had taken place with the Agency and/or the County, cannot be used as "mitigation" for impacts caused by the proposed project—this is future or "paper mitigation" in reverse and is, in any case, invalid under CEQA. In fact, the proposed project does quite the opposite of the aforementioned statement: it creates adverse impacts on an approved public facility that is currently under construction. Again, the resulting impacts would destroy the purpose behind the park by reducing the size of the sports fields and the amount of landscaping separating the park and the existing I-15 Freeway. In short, impacts to the El Cerrito Sports Park resulting from Alternatives 4, 5, 6, 7 and 9 need to be avoided completely by either modifying the proposed project through redesign or through the use of other viable alternatives that do not create serious impacts to other areas and/or resources in adjacent communities.

Impacts on Redevelopment Project 1-1986 (El Cerrito / Temescal Canyon sub-area) and the I-215 Corridor Project Area (Mead Valley and Lakeview/Nuevo sub-areas):

Any permanent loss of designated industrial and/or commercial acreage used for the footprint, adjacent right-of-ways and interchanges of the proposed project will result in a reduction of the inventory of acreage available for redevelopment and related economic development activities. As such, the reduction of acreage in any of the aforementioned three (3) redevelopment project sub-areas, which may contain existing development and/or be developed in the future, could impact the Agency by reducing existing and/or the potential for future tax increment generation in those sub-areas. On the other hand, depending on the alternative selected and the placement of on and off ramps, the proposed project could potentially benefit future industrial and/or commercial development in any of the impacted sub-areas by increasing the visibility and marketability of some or all of the remaining commercial and industrial acreage in those sub-areas. However, financial impacts to the Agency and potential impacts to its economic development efforts in Redevelopment Project 1-1986 and the I-215 Corridor Project Area (and proposed amendment sub-areas) appear to have been ignored in the Draft EIR. Moreover, both physical and economic impacts to residents living in all three sub-areas need to be thoroughly evaluated.

If you have any questions, please do not hesitate to call me at 5-9698.  
Thanks! Lance