

COUNTY OF RIVERSIDE

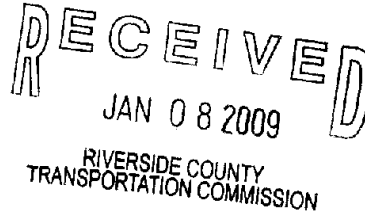
TRANSPORTATION AND LAND MANAGEMENT AGENCY

George A. Johnson · Agency Director

Planning Department

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January 8, 2009



Ms. Cathy Bechtel
Riverside County Transportation Commission
4080 Lemon Street, 3rd Floor
Riverside, CA 92501

RE: Notice of Availability of a Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for the Mid County Parkway Project

Dear Ms. Bechtel,

Thank you for providing the Riverside County Planning Department a copy of the above Notice and computer disks containing the Draft environmental document (EIR/EIS) and Appendices for the Mid County Parkway Project (hereafter "Project"). The proposed Project is the development of an approximately 32 mile west-east regional transportation corridor in western Riverside County between Interstate 15 on the west and State Route 79 on the east. This west-east corridor was envisioned during the Riverside County Integrated Project (RCIP) planning process and considered in the Community and Environmental Transportation Acceptability Process (CETAP), one of three components of RCIP, to support projected population growth in the County for the next 20 years. At that time, a number of "build" alternatives were evaluated to select preferred alternatives and narrow the scope of subsequent environmental analysis. In 2003, the Riverside County Transportation Commission (RCTC) Board authorized RCTC staff to proceed with preparation of a project-level environmental document for a west-east alternative that would follow the existing alignment of Cajalco Road and Ramona Expressway.

The Draft EIR/EIS presents five (5) alternatives in addition to the "No Project/No Action – Existing Ground Conditions" and "No Project/No Action – General Plan Circulation Element Conditions." To simplify this discussion, except for some minor design variations:

- Alternatives 4/5 follow the same alignment between Interstate 15 and Interstate 215;
- Alternatives 6/7 follow the same alignment between Interstate 15 and Interstate 215;
- Alternatives 4/6 follow the same alignment between Interstate 215 and State Route 79;
- Alternatives 5/7 follow the same alignment between Interstate 215 and State Route 79.

Alternative 9, identified as the "preferred" alternative, follows a route further south than the other alternatives, approximately two (2) miles south of existing Cajalco Road, from Lake Mathews easterly to Murrieta Road. This alignment had not previously been considered as one of the "build" alternatives in CETAP. All alternatives, except for the No Project Alternatives, provide for controlled access to or from local roadways to or from the Project.

Planning staff have completed their review and provide the following comments and/or concerns for your consideration:

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1. The proposed Project is only one component of a regional west-east transportation system that will utilize intra-county and inter-county transportation corridors to facilitate west-east mobility in southern California. The overall success of a sustainable intermodal transportation system is dependent upon development of Project segments in conjunction with other individual but interrelated road/interchange improvements. However, the Draft EIR/EIS states that phasing will be addressing during final design and included in the Final EIR/EIS. This provides no opportunity for decision-makers and public reviewers to evaluate the viability of the proposed phasing and potential direct and indirect impacts resulting from Project-specific and cumulative construction and operation.
2. The Appendices included with the Draft EIR/EIS did not include pertinent technical studies to support the findings in the environmental document (e.g., Community Impact Assessment). At a minimum, the recommendations from these studies should have been included in the Draft EIR/EIS to enable decision-makers and public reviewers to impartially weigh the benefits against the environmental consequences of the Project.
3. The Draft EIR/EIS states that, after comparing and weighing the benefits and impacts of the Project, RCTC Commissioners approved Alternative 9 Temescal Wash Area Design Variation (TWS DV) as the Locally Preferred Alternative since the technical studies completed for the Project demonstrated that this alternative is the least environmentally damaging to both the natural and human environments. Since this alternative was never evaluated as part of the CETAP Tier 1 alternatives, staff believes that all supporting technical analyses for this alternative should be included in the Draft EIR/EIS for public evaluation.
4. Section S.3.2 of the Draft EIR/EIS identifies a number of areas where impacts are reduced under Alternative 9 TWS DV. Staff finds that many of these conclusions are not supported by the discussion of impacts in the Draft document.
5. The Draft EIR/EIS identifies that no growth-inducing impacts would result from Project implementation. Clearly, development of a regional transportation corridor in a predominately rural area of the County will enable development which might otherwise have been precluded due to the lack of infrastructure systems. Direct impacts as well as indirect impacts will result from Project approval effecting changes in land use, location of land uses, economic vitality, population demographics, rate and type of growth (e.g., warehouse/distribution facilities). These impacts should be thoroughly analyzed and evaluated in the Draft environmental document.
6. Riverside County General Plan/Circulation Element: Trails and Bikeways – The Riverside County General Plan’s Temescal Canyon, Lake Mathews/Woodcrest, Mead Valley, Lakeview /Nuevo, and San Jacinto Valley Area Plans all contain Trails and Bikeways System maps illustrating planned trail facilities that would be bisected by the alternatives associated with the proposed Mid-County Parkway.

Also, the proposed parkway would pass through, and bisect, many existing rural neighborhoods in the County, where local residents use existing unimproved roadsides, dirt roads, and both improved trails and unimproved trails, for equestrian, pedestrian, and bicycle travel. Unless frequent and adequate accommodations are made for cross-parkway trail usage, significant impacts on the County’s trail system would occur. The impacts (and

potential mitigation measures) associated with all of the alternatives should be evaluated on both existing and planned trail routes, in detail.

Additionally, the following strategies, at a minimum, should be evaluated and utilized to the maximum degree practical, in order to ensure adequate mitigation of impacts on existing and planned future trail facilities:

- The proposed parkway alternatives show a number of proposed bridges over watercourses, other topographic features, and wildlife corridors. Each of these bridges should be evaluated as to their feasibility for trail crossings under them. Even where overhead clearances may be limited, trail crossings should be considered, with appropriate signage, in high priority trail crossing areas (example: MCP crossing of San Jacinto River). Several 24 meter wide (approx. 79 ft. wide) "wildlife land crossings" over the parkway are proposed. Each of the wildlife crossings should be evaluated for potential trail usage, also. The Western Riverside County MSHCP is permitted so as to also accommodate the County's Regional trail system in reserve areas. A possible design solution (which would require confirmation from the Regional Park and Open Space District), would be to use a "Regional Open-Space Trail" standard, meaning a natural surface trail 24" to 36" wide, wherever trail crossings, per se, would be compatible with the wildlife values of crossings. While there may be some potential conflicts associated with joint wildlife/trail usage, there could be benefits for wildlife, too. For example, Stephens Kangaroo Rat might be benefitted in using the crossing by the earthen surface of the trail.
- Unless there are no other feasible options in the vicinity available, for safety reasons, equestrian trails should generally not be routed on road bridges associated with interchanges, nor on local road bridges over the parkway that are not associated with interchanges. However, local roads planned for under-crossings of the parkway would be among the best options for companion usage as trail crossings, since most community equestrian, bicycle, and pedestrian activities already primarily use trails, or unimproved roadsides, associated with the local rural road network.
- Areas along the parkway where there are significant grade changes requiring large amounts of grading should be reviewed to determine whether trail crossings can be directly built into the artificial slopes created to support the roadbed. This approach would permit a lot of flexibility in design, to meet both community and road construction needs, and would avoid the necessity of trail-building in some areas where wildlife compatibility, state and federal permitting, or engineering and construction issues, such as along watercourses or wildlife corridors, could make such other types of crossings near potential built "grade change" trails impractical.

Finally, through a coordinated effort of the County's Transportation and Planning Departments and the Regional Park and Open Space District, the General Plan trail system is currently being reviewed, for possible revision, as part of the County's 2008/09 General Plan update process. Accordingly, we currently have the opportunity to coordinate efforts with RCTC in also making revisions to the County General Plan trails plan that would be beneficial to both parkway planning and the local communities located along the parkway alternative routes. We have already met briefly with RCTC's staff to discuss trail-related issues, and would welcome coordination with RCTC on trail location,

construction, and management issues, as the MCP proposal proceeds through the planning process.

7. Growth Inducing Impacts – There are relatively small areas of land located along and near the parkway alternatives located between I-15 and I-215 in the unincorporated area that contain or are designated for urban uses. Small areas of residential and retail commercial uses exist or are planned, and a large area of industrial uses is planned and is under development directly along I-215. However, most of the land located along and near the parkway alternatives between I-15 and I-215 are rural in nature, or are committed to open space uses, and are designated by the General Plan's Certainty System as lying within the long-range (with changes generally permissible only every five years) Foundation Components of Rural Community, Rural, and Open Space.

The EIR/EIS should address more thoroughly the potential for indirect growth inducing impacts in the area between I-15 and I-215. The construction of a major new freeway-type facility here can be expected to stimulate more requests for changes in the General Plan's Certainty System over time to Community Development – type uses, including, but not limited to, residential subdivisions, retail commercial, particularly at and near interchanges, and other uses particularly appropriate near major transportation corridors, such as warehouses and other industrial uses. These types of uses, absent very careful siting and design considerations, could be incompatible with the predominant rural and open space uses of the area. Although the parkway is not likely to be developed for many years, it should be recognized that the types of development occurring along the parkway could change, and the rate of development there could accelerate, after the parkway is built. Possible means of mitigating the impacts on the rural residential areas should be identified.

The land located along and near the parkway alternatives east of I-215 (in the unincorporated area) are also currently rural in nature. However, in this area, particularly in the Lakeview/ Nuevo area, a relatively large area of Community Development-type uses are planned, and much of the area is under active consideration for development through specific plans and other types of development applications). In summary, the preparation of a project specific EIR/EIS appears premature and perhaps preparation of a Program EIR/EIS would be more appropriate for a project of this duration and magnitude. Referenced technical studies may support the document's conclusions; however, they were not included in the Draft EIR/EIS.

8. Cumulative Impacts – Although the Riverside County to Orange County corridor study is a completely separate project from the proposed Mid-County Parkway, there should be adequate attention given in the EIR/EIS to both the cumulative impacts and cumulative benefits associated with the development of both projects eventually. Additionally, it could be argued that development of the parkway would increase the potential benefits of the inter-county corridor, and thus the possibility of that project eventually being built. Regarding potential cumulative land use impacts, a direct connection via a new corridor to central Orange County will increase the proximity of the Lake Mathews, Woodcrest, and Mead Valley areas to Orange County, thereby increasing both the likelihood and amount of urban types of development (likely primarily residential and industrial) there. There should be at least a general assessment of the potential impacts of this. On the other hand, implementation of the inter-county corridor can be expected to impart positive benefits, too, such as reducing traffic demand on the 91 freeway, and providing a better balance of circulation options in western Riverside County. So, there are both potential benefits and impacts associated with this. Due

to the significance of the proposed parkway in this potential future major transportation corridor network, these potential impacts and benefits should be assessed, accordingly.

9. Multi-modal Transportation System and Transit-Oriented Development Potential – The EIR/EIS does not sufficiently address the potential traffic reduction, air quality improvement, greenhouse gas reduction, etc., potential mitigation benefits that could become available by making the MCP a multi-modal transportation facility. The feasibility, and potential impacts/benefits, of designing this new 32 mile long major transportation corridor to eventually accommodate an express bus service, and where feasible, light rail service, should be assessed.

For the portion of the parkway west of I-215, it is probable that the steeper grades involved, especially in the sections of alternatives located between Temescal Valley and the Lake Mathews/Gavilan Plateau area, could make light rail service along the parkway infeasible there. Here, an express bus service connecting to the Perris Valley Line (Metrolink extension project), and to possible future rail service in the Temescal Valley, might be feasible. However, the feasibility, benefits, and impacts of both rail and express bus facilities/services should be assessed.

For the alternatives of the parkway located east of I-215, both express bus and light rail services might be practical, and the potential for both should be addressed. In addition, in the Lakeview area, a significant amount of residential, commercial, and industrial development is approved or is in the advanced planning stages. For this area, accommodation for one or more transit-oriented developments should be considered as the design of the parkway progresses.

If you should have any questions regarding these comments, please contact Kathleen Browne, Urban Regional Planner III, at (951) 955-4949 or by email at kbrowne@rctlma.org.

Sincerely,

RIVERSIDE COUNTY PLANNING DEPARTMENT



Ron Goldman, Planning Director

1/8/09

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