

**COUNTY OF RIVERSIDE**  
**TRANSPORTATION AND**  
**LAND MANAGEMENT AGENCY**

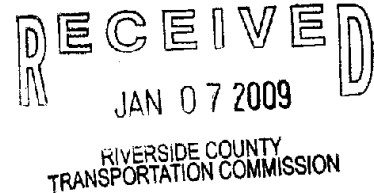
**Transportation Department**



*Juan C. Perez, P.E., T.E.*  
*Director of Transportation*

January 7, 2009

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



Re: Comments on the Draft Mid-County Parkway (MCP) EIR/EIS

Dear Ms. Bechtel,

I want to first congratulate the Riverside County Transportation Commission (RCTC) and its staff on achieving the important milestone of completing a Draft EIR/EIS for the Mid-County Parkway, which is now being circulated for public review and comment. Delivery of any major transportation project is a difficult challenge requiring navigation through a complex environment, in order to weigh project impacts and benefits and involve many stakeholders to arrive at the best possible project for the community. Doing so on a project of this magnitude is a monumental undertaking and we appreciate the tremendous leadership shown by the Commission and staff to pursue this critical improvement.

We appreciate the opportunity to be involved in this process and offer the following comments in the interest of arriving at the best possible project that meets the regional transportation needs, while integrating this with local circulation needs, feasibility of construction, coordination with land use decisions being considered by the County, and of course the balancing of environmental considerations that this project will need to address. Approximately 90% of this 32-mile corridor traverses through currently Unincorporated portions of Riverside County. The Riverside County Transportation Department is therefore committed to working closely with RCTC to coordinate the interests of regional and local transportation needs, and appreciate the working partnership that we have developed. Please note that the comments that we are providing are those of the Transportation Department staff based on our technical review of the documents; these comments have not been reviewed or endorsed by our Board of Supervisors.

**A. PROJECT PHASING**

Given that this project consists of a 32-mile corridor with rough costs ranging from \$2.98 Billion to \$3.76 Billion in today's dollars (depending on the alternative), it clearly will need to be constructed in stages. The segment between I-215 and SR-79 in general, (referred to herein as the Ramona Segment), and more specifically between the "curve" on Ramona Expressway south of Lake Perris (around Antelope Road) and easterly to Warren Road, should be the first stage to be pursued for construction for the following reasons:

## **1. Right-of-Way Considerations**

This portion of the project alignment overlaps the existing Ramona Expressway (regardless of the MCP alternative selected) for a significant distance. There is a substantial amount of existing right-of-way on Ramona Expressway that can be used to minimize acquisitions for the MCP. Ramona Expressway has historically been acknowledged as a major corridor, and the County has reserved major right-of-way for it through its General Plan and the development process for many years. In areas where development has not been approved, much of the land ownership is consolidated into large blocks with just a few property owners, which also greatly simplifies the acquisition process, as does the lack of any habitable structures in this segment that would require homeowner relocation.

## **2. Potential Public/Private Partnership**

There are several large, master planned communities being proposed and considered in the Lakeview/Nuevo area. If a significant portion of these projects move forward to approval and construction, there will be unique opportunities to create a public/private partnership to deliver significant improvements to Ramona Expressway that can be integrated into the MCP. The County has been working with a coalition of these master developers, referred to as the Ramona Mobility Group (RMG), to identify Master-Planned road needs for the area. This group has also identified a potential supplemental, localized funding source through the creation of a Road and Bridge Benefit District (RBBB) that would provide major road funding assistance. The RBBB would work in conjunction with the Measure "A" sales tax dollars and the Transportation Uniform Mitigation Fee (TUMF) Program to comprehensively fund improvements to Ramona Expressway, which overlap with the alignment of the MCP.

An example of this would be the delivery of a major bridge structure over the San Jacinto River, which would not only serve the localized development needs for infrastructure in Lakeview/Nuevo area, but would also build half of the ultimate MCP bridge structure. There are multiple opportunities to deliver approximately 7 miles of Ramona Expressway/MCP improvements with minimal impact to adjacent property owners and greatly reduce costs to Riverside County Tax-payers by matching Measure "A" dollars with RBBB and TUMF development fees.

## **3. System Continuity**

This 7-mile segment on a shared Ramona Expressway/MCP alignment would connect to existing 4-lanes on Ramona Expressway westerly of the Lake Perris "curve" and 4-lanes easterly between Warren Road and SR-79. Together with improvements to the Ramona Expressway/I-215 Interchange being done by the City of Perris and Riverside County in 2009/2010, this would complete a very usable 4-lane corridor through Ramona Expressway between I-215 and SR-79 that would serve the area well for several years until it can be further expanded.

#### **4. Other Benefits**

Construction on this segment would provide immediate safety benefits to the many commuters using Ramona Expressway that travel on this 2-lane road. The 4-lane project would provide for adequate shoulders and a striped median to separate the high-speed traffic.

We therefore request that the “Final” MCP document acknowledge this phasing delivery and that it provide construction-level environmental clearance to allow either the County or RCTC to proceed with construction of these 7-miles of Ramona Expressway segment in the near future.

#### **B. BRIDGE OVER THE SAN JACINTO RIVER**

The MCP document has identified that a 4,300 foot long bridge would be appropriate to span the River. Much detailed hydrology work has been done on this crossing as part of the River Project and other efforts to determine the upstream and downstream impacts of a crossing on Ramona Expressway. Building on that work, the County has caused a study to be prepared by Albert A. Webb and Associates to further analyze this crossing.

The findings of this study indicate that a bridge length of 2,600 feet can meet the needs of this crossing hydrologically upstream and downstream in the 100-year storm event. This study identified that the change in surface water elevation due to the bridge would be 1 inch (0.09 ft.) upstream and 3 inches downstream. The upstream elevation change is within the 0.10 ft. threshold established by FEMA that would not constitute a hydraulic impact to the floodplain. It should also be noted that this may well be a conservatively high estimated elevation change, and the actual impact may well be less, in that this analysis assumes that the upstream Mystic Lake area has no “dead storage” hydrological potential. In fact, studies have been done by other groups that indicate that Mystic Lake is naturally subsiding, and the storage benefit of that could well result in a lesser impact due to the bridge crossing, which would lead to a narrower bridge. The cost differential of the 2,600-foot bridge versus the 4,300-foot bridge is in the range of \$35 Million, a substantial savings. It should also be noted that the Ramona Expressway Bridge is a covered facility in the MSHCP, which calls for a minimum 1000- foot corridor as part of the San Jacinto River Flood Control project, much narrower than a 2,600-foot bridge. Based on independent analysis of MCP biological data, jurisdictional and biological impacts from the 2,600-foot bridge are virtually identical to the proposed 4,300-foot bridge.

We therefore request that this bridge crossing be examined in greater detail to arrive at a bridge length that is the most feasible and cost-effective while meeting the necessary hydrological and biological thresholds.

#### **C. CAJALCO SEGMENT**

The “Cajalco Segment” between I-15 and I-215 poses a series of greater challenges than the “Ramona Segment” west of I-215. The alternative that has been identified as “locally preferred” by RCTC encompasses approximately 17 miles along an entirely new alignment south of Cajalco Expressway (which has been a major planned facility for over 50 years). This makes it challenging to build given the extensive right-of-way acquisition involved,

inability to construct it in stages, and funding considerations, and would therefore not be expected to come on line for many, many years. The other alternatives that entirely used Cajalco Expressway alignment, or in combination with El Sobrante Road, also have significant challenges and impediments due to property impacts on many existing homes in the Mead Valley and Victoria Grove areas. All alternatives in this area have major environmental considerations that need to be examined and weighed in relation to the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP), the Metropolitan Water District Lake Mathews Habitat Conservation Plan (MWD HCP), the El Sobrante Landfill Habitat Conservation Plan, the Stephen's Kangaroo Rat Habitat Conservation Plan and the Harford Springs Reserve.

The County Transportation Department is in the process of embarking on a plan to improve existing Cajalco Road to 4-lanes between I-15 and I-215. This is urgently needed to improve mobility and safety on this primary east-west corridor that serves all of Western Riverside County, and needs to progress well in advance of the timing necessary to deliver this segment of the MCP. This project also will need to work through some of the various challenges, particularly coordination with the MWD HCP, that exist for the MCP. We estimate the cost to deliver this corridor to be in the \$150 - \$200 Million range.

Access to the MCP is another issue that should be carefully considered. The preferred alternative has interchanges proposed at 3 locations within a 17-mile reach (Old Elsinore, to Lake Mathews Road and to Cajalco about a mile east of Temescal Canyon Road). Although this very limited access certainly promotes unimpeded traffic flow, this needs to be weighed against the benefits of providing greater access from this Regional sub-area to the MCP, particularly the heavily populated communities of Woodcrest, Mead Valley, and to the City of Riverside itself. Access to these areas would make the MCP a much more usable alternative to Van Buren Blvd., SR-91, and other heavily traveled east-west routes, particularly if at some future time the western terminus of the MCP connects to the eastern terminus of an Orange County to Riverside County Corridor. We are of the opinion that an interchange on whatever alignment is ultimately selected for the MCP should be included that connects to Wood Road or some other major north-south corridor into Woodcrest and the City of Riverside, and request that this be further studied. Without such a connection, significant traffic would still need to use Cajalco Road to access a southerly MCP route.

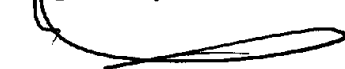
The MCP document refers to the potential abandonment of Cajalco Road to address MSHCP conformity. We note that abandonment of an existing road would require a future, discretionary action of the Board of Supervisors through the road vacation process, which involves a public hearing that would weigh the benefits and impacts of closing the road at such future time, based on traffic use and other factors, and is therefore not something that the County can prudently agree to at this time.

All of the above factors point to the benefits of studying a "hybrid" route that utilizes a new MCP alignment in certain areas, (such as through Mead Valley in order to connect to the alignment east of I-215 and avoid major property acquisitions), and then transitions to existing Cajalco Road along an alignment that allows for an interchange connection to Wood Road. This would require further discussions with many stakeholders including MWD, the environmental community, and others. This should also be done in the context of comprehensively looking at all major transportation infrastructure in the area, including the potential realignment of La Sierra Avenue away from the Lake Mathews Dam that may be of

considerable interest to MWD. This effort should also comprehensively evaluate the numerous habitat conservation plans and the MSHCP to arrive at a coordinated approach for implementation of open-space preserves. While this integrated approach would require an extension of the current MCP schedule to yield the best possible MCP project, we believe that ultimately it would result in the delivery of a transportation improvement in a phased manner using portions of Cajalco Road much sooner than what can be done through an entirely separate 17-mile corridor. The decisions that will be made through this MCP process will guide the expenditure of limited transportation funds and serve the County for the next several decades. Given this, we are requesting that further study be done on this very complex Cajalco Segment of the MCP to arrive at the best possible solution that carefully weighs the transportation, environmental, and community considerations.

The Riverside County Transportation Department sincerely appreciates the opportunity to comment on this project and hope that the Commission will take these comments into careful consideration. We stand ready to constructibly partner with you to deliver these needed transportation improvements that our Riverside County citizens so urgently need, and again applaud you for your efforts on this undertaking.

Respectfully,



Juan C. Perez  
Director of Transportation

Cc: Board of Supervisors  
Bill Luna, County CEO  
George A. Johnson, TLMA Agency Director  
Patty Romo, Transportation Deputy Director  
Laurie Correa-Dobson, Environmental Manager  
Farah Khorashadi, Engineering Division Manager