



United States Department of the Interior

FISH AND WILDLIFE SERVICE
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Palm Springs Fish and Wildlife Office
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Palm Springs, California 92262



In Reply Refer To:
FWS-WRIV-08B0080-13TA0244

F-5

Mr. Tay Dam
Federal Highway Administration
Los Angeles Metro Office
888 S. Figueroa Street, Suite 1850
Los Angeles, California 90017

APR 22 2013

Subject: Recirculated Draft Environmental Impact Report/Supplemental Draft Environmental Impact Statement for the Mid County Parkway Project, Riverside County, California

Dear Mr. Dam:

The U.S. Fish and Wildlife Service (Service) appreciates the opportunity to review the Recirculated Draft Environmental Impact Report/Supplemental Draft Environmental Impact Statement (REIR/SEIS) from the Federal Highway Administration (FHWA), Riverside County Transportation Commission (RCTC) and the California Department of Transportation (CalTrans) for the construction of the Mid County Parkway project between Interstate 215 and State Route 79. We previously commented on the Draft EIS/EIR for the larger 32-mile corridor from State Route 79 to Interstate 15 (January 20, 2009). The Project has followed the National Environmental Policy Act (NEPA) and Clean Water Act Section 404 Integration Process for Federal Aid Surface Transportation Project in California Memorandum (NEPA/404 MOU). The Service participates in the Mid County Parkway Small working group which functions as an interagency forum project feedback and implements the NEPA/404 MOU. We are providing the following comments to assist with the development of a final EIR/EIS.

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The proposed project would construct an approximately 16-mile regional transportation facility between Interstate 215 and State Route 79. The REIR/SEIS includes analyses of three alternatives, with two design variations, in addition to two no project/no action alternatives. The three build alternatives have varying alignments with most road segments in common. The San Jacinto River Bridge Design Variation proposes two shorter span bridges across the San Jacinto River floodplain instead of a longer span single bridge. Alternative 1A (No Project/No Action-Existing Ground Conditions) assumes 2040 traffic based on land use patterns consistent with the County of Riverside's approved General Plan and the planned street network, without future improvement to the Ramona Expressway. Alternative 1B (No Project/No Action-General Plan Circulation Element) is the same as 1A, but assumes the implementation of the County of Riverside's approved General Plan circulation element including planned improvements to the Ramona Expressway.

The Service has issued Incidental Take Permits in association with two habitat conservation plans pursuant to section 10(a)(1)(B) of the Endangered Species Act within the project area. The Service will continue our coordination on the proposed project through the policies and procedures identified in the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP), and the Habitat Conservation Plan for the Stephens' Kangaroo Rat (SKR HCP).

F-5-2

San Jacinto River Bridge at Lakeview

The base case design for the San Jacinto River Bridge would avoid encroachment into the San Jacinto River floodway and is environmentally preferable to the Design Variation. The bridge is required for all three alternatives (4 Modified, 5 Modified, and 9 Modified). The base case design provides for a 4,321-foot deck on columns (Figure 3.9.4) spanning the San Jacinto River floodplain. Alternatively, the Design Variation (Figure 3.9.5) proposes two shorter sections on columns (531 feet and 1,941 feet) and approximately 1,849 linear feet of fill on either end of the bridges. The proposed Design Variation was not included in the Draft EIS/EIR circulated for the originally proposed 32 mile project, so the full span base case bridge is clearly feasible.

The alignment of the proposed Mid County Parkway where it crosses the San Jacinto River in Lakeview runs between two MSHCP reserve elements, Existing Core H to the north of the alignment and the Proposed Extension of Existing Core 4 on the south. The MSHCP planning species for Proposed Extension of Existing Core 4 are dependent on the San Jacinto River and its floodplain processes.

We recognize that the bridge in the existing Ramona Expressway confines the flow of the San Jacinto River. The design variation would result in fill (structures) in the floodplain and limit floodplain processes in the MSHCP conservation area. It would also preclude the opportunity to remove the obstruction at the Ramona Expressway and restore full expression of river floodplain processes within the MSHCP conservation area. The Service recommends that RCTC and CalTrans adopt the environmentally superior full San Jacinto River Bridge proposal because it would result in substantially less fill in the 100 year floodplain of the San Jacinto River and preserve future and existing flood plain processes which will support the MSHCP conservation scenario in the Proposed Extension of Existing Core 4.

F-5-3

Wildlife Connectivity and Fencing

The discussion in the REIR/SEIS on wildlife connectivity appropriately considers the MSHCP reserve configuration and the potential for the proposed roadway to affect wildlife movement directly and indirectly. The Service recognizes and appreciates the efforts to incorporate wildlife movement as project features in order to minimize the adverse effects of habitat fragmentation. We recommend continued coordination as further detailed engineering designs commence. The Service also recommends that the project include a detailed monitoring and maintenance plan to determine and maintain the efficacy of the crossings for target wildlife species.

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MSHCP and Determinations of Biologically Equivalent or Superior Preservation

We request that you coordinate with our office and the California Department of Fish and Wildlife on the Determinations of Biologically Equivalent or Superior Preservation (DBESPs)

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that will be prepared consistent with the MSHCP for riparian/riverine resources, and focused survey plants and animals prior to publication of the final EIR/EIS, so that we can come to agreement on specific offsetting conservation commitments. Please include the specific offsetting conservation commitments for these species in the final EIS.

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Additionally, the assessment of impacts to riparian/riverine resources in the REIR/SEIS (Table 3.17.C and Page 3.17-26) did not include the alkali grassland in the project footprint. This vegetation community is part of the San Jacinto River floodplain riverine system and we request that you include affected areas of alkali grassland in the DBESP for riparian/riverine resources.

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Clean Water Act Section 404 Mitigation

The Service appreciates the commitment to work with State and Federal agencies to develop a compensatory mitigation strategy for offsetting unavoidable impacts to waters of the United States and requests that further discussion of the offsetting measures be included in the Small Working Group meetings in preparation for upcoming Least Environmentally Damaging Practicable Alternative (LEDPA) checkpoint under the NEPA/404 MOU. Potential on- and off-site mitigation opportunities were identified in A Conceptual Mitigation Plan (Appendix M). We encourage the selection of mitigation sites which support the MSHCP conservation scenario and comply with the 2008 Army Corps of Engineers and Environmental Protection Agency Compensatory Mitigations Rule.

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We appreciate the opportunity to comment on the REIR/SEIS. We further commend the effort to coordinate and collaborate with State and Federal agencies to minimize and avoid project related environmental effects prior to the release on the REIR/SEIS and the commitment to continued coordination as the project completes environmental review. We look forward to working with you on the LEDPA determination and the MSHCP DBESPs and Joint Project Review Process. If you have any questions regarding this letter please contact John Taylor or Karin Cleary-Rose at 760-322-2070, extensions 218 and 206 respectively.

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Sincerely,



Kennon A. Corey
Assistant Field Supervisor

cc:

- Marie Petry, CalTrans District 8
- Cathy Bectel, RCTC
- Susan Myer, U.S. Army Corps of Engineers
- Susan Sturges, EPA
- Jeff Brandt, CDFW