

Community Development
Department
Planning Division

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RIVERSIDE COUNTY
TRANSPORTATION COMMISSION

March 29, 2013

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

SUBJECT: NOTICE OF AVAILABILITY OF A RECIRCULATED DRAFT ENVIRONMENTAL IMPACT REPORT/SUPPLEMENTAL DRAFT ENVIRONMENTAL IMPACT STATEMENT – MID COUNTY PARKWAY PROJECT

Dear Ms. Bechtel:

The City of Riverside appreciates the opportunity to review and comment on the recirculated Draft Environmental Impact Report (DEIR)/Supplemental Draft Environmental Impact Statement (SDEIS) for the Mid County Parkway (MCP) project.

Background/Project History

In 2004, the Riverside County Transportation Commission (RCTC) began the environmental review process for the MCP project through the issuance of a Notice of Preparation (NOP). The original MCP project was a proposed 32-mile east-west transportation corridor between Interstate 15 in the west and State Route 79 in the east, with all of the alternatives under consideration traversing the City's southern Sphere of Influence. In October 2008, RCTC released the Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for the original MCP project, outlining the project's environmental impacts on the project area.

Since the issuance of the initial notice of preparation in 2004, City staff has actively participated in the MCP project's development process, meeting on repeated occasions with RCTC staff as well as submitting formal comments in response to the release of various project-related documents. On December 16, 2008, the City Council declared its support for the MCP project noting its potential to provide an important east-west corridor southerly of the City's limits and serve as a viable alternative to divert cut-through traffic from City streets. In addition, the City Council stated its strong desire to see the western segment of the MCP project constructed prior to the eastern segment and cautioned that long-overdue capacity improvements to the Interstate-15/State Route-91 interchange would be necessary to adequately accommodate the anticipated additional traffic caused by the MCP project.

On June 4, 2009, RCTC staff formally notified City staff of its recommendation to withdraw the western segment from the MCP project's scope, focusing only on construction of the eastern segment. In response to this change in project scope, the City Council, on June 9, 2009, by unanimous vote, declared its strong opposition to this proposal.

In two separate letters (see enclosures), one from City staff to RCTC (dated June 10, 2009) and one from the City Council to RCTC (dated June 29, 2009), the City of Riverside expressed major concerns with the construction of only the eastern segment of the MCP project and offered a set of recommendations, including delaying completion of the MCP project as proposed until several major improvements in the region are completed. These include improvements to I-15 and the I-15/SR-91 interchange, as well as improvements to widen Cajalco Road to six lanes between I-215 and I-15.

Comments on the Recirculated DEIR/SDEIS

After reviewing the recirculated DEIR/SDEIS, the document does not adequately identify nor assess the full impacts of the MCP project on the City of Riverside. Additional information is needed before a complete analysis can be made. As such, City staff offers the following comments and concerns for your review and consideration:

- The DEIR/SDEIS indicates that the 2040 traffic volumes on I-215 are projected to be lower than those projected for 2020; however the cause of the reduction in traffic volumes is unclear. The DEIR/SDEIS needs to include an explanation as to the cause of the reduction in traffic volumes. R-3-1

- The DEIR/SDEIS assumes that Cajalco Road between I-215 and I-15 will be improved from two lanes to four lanes by 2020, and improved to six lanes by 2040. As such, the project's impacts are based on these improvements being completed by the respective target years. While the project proposes to construct one new lane in each direction on I-215 between Nuevo Road and Van Buren Boulevard, it does not offer any improvements to Cajalco Road in the event that the anticipated improvements are not completed by the target years. The DEIR/SDEIS needs to adequately analyze the impacts associated with not improving Cajalco Road and propose mitigation as necessary. R-3-2

- The DEIR/DSEIS analyzed the following intersections in the City of Riverside:
 - I-215/Alessandro Boulevard
 - I-215/Van Buren Boulevard
 - Alessandro Boulevard/Sycamore Canyon Boulevard
 - Van Buren / Meridian Parkway R-3-3

The DEIR/DSEIS concluded that none of the project alternatives will directly cause any of the studied intersection to operate at LOS F at project build out and, therefore, no mitigation is required for these intersections. However the project will, nonetheless, have cumulative impacts to the intersections and, therefore, the DEIR/SDEIS needs to include a fair-share analysis of the cumulative impacts and propose mitigation as necessary.

- The DEIR/DSEIS does not analyze the traffic impacts of the project to the freeway interchanges at SR-60/I-215 and SR-60/SR-91/I-215. The DEIR/SDEIS needs to adequately analyze the impacts to these interchanges and propose mitigation as necessary. R-3-4
- During the construction phase of the project, there will be a significant increase in truck traffic on Cajalco Road between I-215 and I-15, as well as on I-215 between the SR-74 and the SR-60. However, the DEIR/DSEIS does not analyze the potential for cut-through truck traffic through the City of Riverside on Van Buren Boulevard and Alessandro Boulevard to avoid freeway congestion on SR-60 and SR-91. The DEIR/SDEIS needs to adequately analyze the impacts to these thoroughfares and propose mitigation as necessary. R-3-5
- The DEIR/SDEIS indicates that a final Traffic Management Plan (TMP) to address impacts during construction will be complete as part of the project. The TMP will be completed in coordination with the cities of Perris and San Jacinto, as well as the County of Riverside. The City of Riverside would like to be included as part of the coordination team in completing the final TMP. R-3-6

City staff appreciates your continued collaboration and looks forward to continue working with the RCTC and its staff. Please forward copies of all revised plans, staff reports, and environmental documents, as they pertain to this project for review. Should you have any questions regarding this letter, please contact Gus Gonzalez, Associate Planner, at (951) 826-5277 or by e-mail at ggonzalez@riversideca.gov.

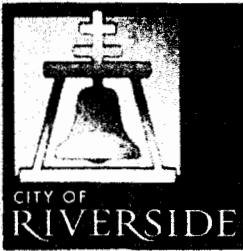
Sincerely,



Steve Hayes, AICP
City Planner

(Enclosures)

cc: William "Rusty" Bailey III, Mayor
Riverside City Council Members
Scott Barber, City Manager
Deanna Lorson, Assistant City Manager
Kristi Smith, Supervising Deputy City Attorney
Tom Boyd, Public Works Director/City Engineer
Steve Libring, City Traffic Engineer
Al Zelinka, Community Development Director
Emilio Ramirez, Community Development Deputy Director
Juan C. Perez, Director of Transportation, Riverside County Department of Transportation,
4080 Lemon Street, Riverside, CA 92502-1629



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RIVERSIDE COUNTY
TRANSPORTATION COMMISSION

June 10, 2009

Bob Magee, Chairman
Riverside County Transportation Commission
4080 Lemon Street, Third Floor
Riverside, CA 92502-2208

**SUBJECT: OPPOSITION TO RIVERSIDE COUNTY TRANSPORTATION
COMMISSION PROPOSAL TO REFOCUS MID-COUNTY PARKWAY
TO CONSTRUCT ONLY THE EASTERN SEGMENT BETWEEN I-215
AND SR-79**

Chairman Magee and Commissioners:

In response to RCTC staff's recommendation to withdraw the western segment of the MCP project, on June 9, 2009 the City Council voted unanimously to oppose the proposal to refocus the MCP project.

Background/Project History

In 2004, RCTC began the environmental review process for the MCP project through the issuance of a notice of preparation (NOP). The NOP identified eight alternatives to be studied and considered, with a ninth alternative added later as a result of ongoing consultation with public agencies and the result of completed engineering and environmental studies. Alternative 9 was subsequently selected as the locally preferred alternative in September 2007. More recently, in October 2008, RCTC released the Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS) outlining the MCP project's environmental impacts on the project area. To date, RCTC has committed significant financial resources for the study and completion of the MCP project.

Since the issuance of the initial notice of preparation in 2004, City staff has actively participated in the MCP project's development process, meeting on repeated occasions with RCTC staff as well as submitting formal comments in response to the release of various project-related documents. Given the proximity of the MCP project to the City and the potentially significant traffic-related impacts on the City, RCTC staff was invited to provide the Transportation Committee with an updated overview of the project. On December 16, 2008, the City Council declared its support for the MCP project noting its potential to provide an important east-west

corridor southerly of the City's limits and serve as a viable alternative to divert cut-through traffic from City streets. In addition, the City Council stated its strong desire to see the western segment of the MCP project constructed prior to the eastern segment and cautioned that long-overdue capacity improvements to the Interstate-15/State Route-91 interchange would be necessary to adequately accommodate the anticipated additional traffic caused by the MCP project. City staff provided additional comments to RCTC expressing concern that the document generally failed to adequately identify and assess the MCP project's full impacts on the City. Particular emphasis was placed on the traffic-related impacts likely to affect the City if the eastern segment of the MCP project was constructed prior to the western segment. In effect, City streets, most notably Alessandro Boulevard and Van Buren Boulevard, would serve as cut-through corridors for vehicles accessing Interstate-15 or State Route-91.

City's Opposition

On June 4, 2009, RCTC staff formally notified City staff of its recommendation to withdraw the western segment from the MCP project's scope, focusing only on construction of the eastern segment. In response to this change in project scope, the City Council, on June 9, 2009, by unanimous vote, declared its strong opposition to this proposal.

Construction of only the eastern segment of the MCP project will result in significant traffic-related impacts to the City. It was expected that construction of the entire MCP project would serve to divert cut through traffic from City streets by providing a more accessible connection to both Interstate-15 and State Route-91. With an expected increase in population throughout the area, levels of service on existing transportation corridors are projected to deteriorate substantially; the RCIP itself estimates that the State Route-60/Interstate-215 interchange alone will increase its number of vehicle trips from 170,000 to over 300,000 per day. Absent the western segment, traffic would continue to utilize City streets as connections and exacerbate existing conditions. In effect, the proposal now under consideration would do nothing to alleviate current – or future – traffic impacts to City streets, Interstate-15, or State Route-91. Greater focus should instead be placed on much needed capacity improvements that address present day concerns, rather than committing already limited resources to projects that address capacity for future needs in undeveloped areas. What is more, construction of the eastern segment would create a growth inducing impact for those communities to be served by its construction. More than providing a new transportation corridor, the eastern segment would enable the proliferation of piecemeal development further removed from employment centers, contributing directly to area-wide traffic congestion and increasingly worse levels of service.

The City's Circulation and Community Mobility Element of the General Plan 2025, as well as County of Riverside's General Plan, included in its traffic analysis the full construction of the MCP project. As noted previously, construction of the western segment was expected to divert cut-through traffic from City streets, particularly from Alessandro Boulevard and Van Buren Boulevard. With the proposal to withdraw the western segment, levels of service on Alessandro Boulevard and Van Buren Boulevard would deteriorate to unacceptable service levels. In addition, the growth and densities approved in the County's General Plan and in neighboring jurisdictions are unattainable absent the full implementation of the MCP project – one of the necessary mitigation measures for the General Plans. Moreover, the new Countywide Traffic

Model for Riverside County also includes the full MCP project.

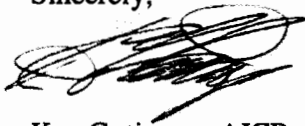
City's Recommendation

To allow for improved traffic conditions, the City Council urges RCTC:

- Commit to constructing the necessary improvements to Interstate-15 and the Interstate-15/State Route-91 interchange first;
- Improve Cajalco Road to six-lanes without precluding future improvements to an expressway or higher status;
- Delay construction of the MCP project east of Interstate-215 until the necessary improvements to Interstate-15 and the Interstate-15/State Route-91 interchange are underway;
- Delay any action refocusing the EIR/EIS for 90 days; and
- Work with neighboring jurisdictions to reduce planned development east of Interstate-215.

City staff appreciates your continued collaboration and looks forward to continue working with the RCTC and its staff. Please forward copies of all revised plans, staff reports, and environmental documents, as they pertain to this project for review. Should you have any questions regarding this letter, please contact Moises A. Lopez, Associate Planner, at (951) 826-5264 or by e-mail at mlopez@riversideca.gov.

Sincerely,

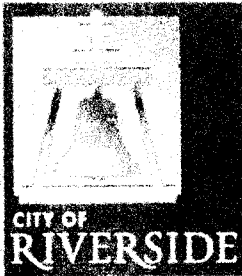


Ken Gutierrez, AICP
Planning Director

cc: Ronald Loveridge, Mayor
Riverside City Council Members
Brad Hudson, City Manager
Belinda Graham, Assistant City Manager
Tom DeSantis, Assistant City Manger
Scott Barber, Community Development Director
Siobhan Foster, Public Works Director
Tom Boyd, Deputy Public Works Director/City Engineer
Steve Libring, Traffic Engineer
Kristi Smith, Supervising Deputy City Attorney
Ron Goldman, Planning Director, Riverside County Planning Department, 4080 Lemon Street, 9th Floor, Riverside, CA 92502
Juan C. Perez, Director of Transportation, Riverside County Department of Transportation, 4080 Lemon Street, Riverside, CA 92502-1629

Tay Dam, Federal Highway Administration, 650 Capital Mall, Suite 4-100, Sacramento,
CA 95814

Cathy Bechtel, Riverside County Transportation Commission, 4080 Lemon Street, Third
Floor, Riverside, CA 92502-2208



Office of the City Council

June 29, 2009

Ms. Anne Mayer
Riverside County Transportation Commission
4080 Lemon Street, 3rd Floor
PO Box 12008
Riverside, CA 92502-2208

Dear Ms. Mayer:

I appreciate everyone taking the time to meet with the City regarding our concerns with the re-focusing of the Mid-County Parkway (MCP) study. The City's major concern is that the re-focusing of the MCP study does not mean that the MCP between 15 and 215 freeways is not going to be constructed in the future. The action to re-focus the MCP should be considered part of a long term plan to complete the parkway between SR 79 and the 15 freeways and for the County as a whole to focus short term efforts on improving Cajalco, between the 15 and 215 freeways and the easterly segment of the MCP.

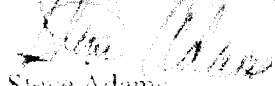
In general, the City of Riverside will support the proposal outlined in your letter of June 15th under the following principles:

1. The City of Riverside will support RCTC's proposal to prioritize funding for the environmental review to widen Cajalco Road between the 15 and 215 freeways. The widening of Cajalco should ultimately include:
 - a. 6-lanes between I-15 and Lake Mathews
 - b. 4-lanes south of Lake Mathews (future expansion to 6-lanes); and,
 - c. 6-lanes between El Sobrante and I-215
2. The City of Riverside also supports preparation of a phasing plan for the MCP east of the 215 freeway and for Cajalco Road between the 15 and 215 freeways as outlined in your June 15th letter. The critically important points are:
 - a. The improvements on the 91 and 15 freeways must be a top priority and must be built at least concurrently with the MCP and Cajalco Road improvements;
 - b. There must be equity in the funding and capacity improvements on MCP east of the 215 freeway and on Cajalco Road between the 15 and 215 freeways;

3. Should the County be unable to environmentally clear the Cajaleo Road improvements by 2013, RCTC will re-start the westerly segment of the MCP; and.
4. Circulation between the 15, 215 and 60/215 freeways should be a priority for RCTC to fund under the Measure Arterial highway Program or through other funding sources once the economy improves. The program should give priority to arterials such as: Van Buren, M.I.K, Arlington, Overlook Parkway, Washington, Madison, and similar transportation corridors.

If you have any questions, please contact me at 826-5991.

Sincerely,



Steve Adams
Councilmember, Ward 7