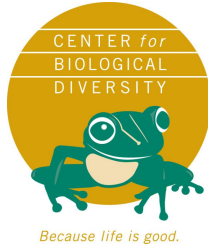




**San Bernardino Valley
Audubon Society**



**Friends of the Northern
San Jacinto Valley**

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via electronic and US mail

July 2, 2009

Riverside County Transportation Commission (RCTC)
4080 Lemon Street, 3rd Floor
P.O. Box 12008
Riverside, CA 92502-2208

By email to jharmon@rctc.org

SUBJECT: RCTC Staff Recommendation to Suspend the Mid-County Parkway Project Between I-15 and I-215 and to Accommodate Increased Traffic by Widening and Straightening Cajalco Road

The San Bernardino Valley Audubon Society, the San Gorgonio Chapter of the Sierra Club, the Center for Biological Diversity, the Friends of the Northern San Jacinto Valley, and Inland Empire Waterkeeper wish to go on record as offering qualified support for the RCTC staff recommendation to suspend the Mid-County Parkway Project between I-15 and I-215 and to accommodate increased traffic by widening and straightening Cajalco Road. We were among the many vocal opponents of the Mid-County Parkway, and while we have significant concerns about the proposed widening and straightening of Cajalco Road, we believe that on balance, suspending this section of the MCP and shifting the expected traffic to an improved Cajalco Road offers a much better choice for both the people and wildlife of western Riverside County.

Audubon, Sierra Club, Friends, CBD, and Waterkeeper described our concerns and misgivings about the Mid-County Parkway at considerable length in comments submitted to the DEIR. We greatly appreciate that the RCTC staff has read our comments as well as others from the community and has made the above recommendation to the Commission as a result of those comments.

Since the Commission is considering the suspension of the Mid-County Parkway project between the I-15 and I-215, we feel the need to repeat our concerns and misgivings about this project, though merely as bullet points this time:

- The proposed route would have a direct negative impact on the El Sobrante Nature Reserve, the Harford Spring Nature Reserve, Estelle Mountain Reserve, and the Mott Preserve, destroying much of their usefulness as preserves, as well as much of their natural beauty. These are areas that were set aside at taxpayer or rate-payer expense, and the construction of the MCP would negate those expenses.
- The proposed route would have a direct negative impact on the wildlife living outside these reserves in a largely rural area, disrupting an important natural corridor for wildlife movement.
- The proposed route would disrupt several largely rural communities and disrupt the lives of residents who chose to live in the area because of its quiet and its considerable natural beauty
- The proposed route will significantly impact three habitat conservation plans (HCPs). The Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) will be greatly impacted by the MCP and to a lesser but still significant extent, the Stephens Kangaroo Rat HCP and the Metropolitan Water District Lake Mathews MSHCP will also be impacted.
- Building an automobile transportation corridor of this magnitude through such a largely unpopulated area is an overt inducement to essentially unchecked growth and would add many more square miles of urban sprawl to the County and the region.
- The proposed MCP would encourage more automobile and especially more truck miles in western Riverside County, with the attendant air pollution. Parts of western Riverside County already have some of the worst air pollution in the country. The proposed MCP would add to this problem.
- The proposed “parkway” is a 1960’s solution to a 21st century problem. In an age of global warming, the answers of 50 years ago are no longer appropriate. Given the induced growth, increased vehicles usages, increased air pollution, and other factors, the global warming impacts would be considerable.
- If there is to be investment in transportation, the focus should be on moving people not vehicles through mass transit, or at least the use of existing routes, not completely new ones.

For the above reasons and many more, we have opposed the construction of the Mid-County Parkway from the I-15 to the I-215. For the record, we wish to point out that we also opposed and *continue to oppose* the proposed Mid-County Parkway to be constructed from the I-215 east to SR 79 for many of the above or similar reasons, but we realize that with the suspension of the western portion of the MCP, this will become a separate issue.

After due consideration, we have concluded that suspending the MCP between the 15 and 215 and substituting the widening and straightening of Cajalco Road would address many of the above concerns completely and others partially. While some concerns remain and new concerns are raised by the work on Cajalco Road, the magnitude of these remaining and new concerns is considerably less, because the scales of the two projects are so markedly different. We therefore

offer qualified support to the RCTC staff recommendation to suspend the Mid-County Parkway Project between I-15 and I-215 and to accommodate increased traffic by widening and straightening Cajalco Road.

For the record, we wish to offer a partial but not exhaustive list of our concerns about the widening and straightening of Cajalco Road:

- The expanded Cajalco Road would be 150' wide, including shoulders, medians, and pedestrian and equestrian trails alongside the road. We advocate narrowing it to decrease the impacts to the natural resources and in particular we see no need for trails next to a large highway.
- The Cajalco Road widening will significantly impact three habitat conservation plans (HCPs): the Stephens Kangaroo Rat HCP, the Metropolitan Water District Lake Mathews MSHCP, and the Western Riverside County MSHCP.
- Taxpayer or rate-payer protected habitat would be lost and we would want the best mitigation and amelioration possible for that.
- We would want the expanded road designed such that the attendant impacts to wildlife would be minimized (e.g., adding culverts, bridges, noise barriers, etc.)
- There is no specific provision for mass transit; this project is still focused on moving cars, not people.
- We would want limits to any growth-inducing effects.
- The county proposes to issue two new EIRs, one for the Mead Valley section (the eastern four miles or so) and one for the rest of the road. We believe that CEQA requires a single EIR
- Since land that was set aside for SKR mitigation is now to be destroyed or made useless, and the replacement land is likely to be of lower habitat quality (otherwise it would have been the mitigation land), the current one for one replacement for loss of SKR occupied habitat needs to be changed to one to five.

These then are the sorts of qualifications we make to our statement of support for the RCTC staff proposal. We have already had fruitful discussions on several of these issues with the RCTC staff and other officials of Riverside County. We would hope and presume that such discussions would continue, and that our new and remaining concerns would be adequately addressed as a result of those discussions.

We therefore urge the Riverside County Transportation Commission to adopt the staff recommendation to suspend the Mid-County Parkway Project between I-15 and I-215 and to accommodate increased traffic by widening and straightening Cajalco Road.

In making this statement, we reserve all of our rights under the California Environmental Quality Act, the National Environmental Policy Act, and all other relevant legislation and regulations.

Thank you.

Sincerely,

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