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January 5, 2009

Mr. Tay Dam FHWA 650 Capitol Mall Suite 4-100 Sacramento, CA 95814 DECEIVED NAN 08 2009

RIVERSIDE COUNTY
TRANSPORTATION COMMISSION

Subject: Mid County Parkway and Draft EIR/EIS

The enclosed commentaries reflect my views on the proposed "parkway" and its environmental documents. I strongly urge disapproval of the Draft EIR/EIS and cancellation of the corridor.

Sincerely,

Phyllis Spivey

Phyllin Spiney

Cc: RCTC, Attention Cathy Bechtel



Mid County Parkway: Fs Alt Aout Logistics

(First of a series of commentaries about the proposed Mid County "Parkway")

By Phyllis Spivey

When politicians, bureaucrats and power brokers get together the future of cities, counties and regions, look out. You might gettermonolithic freeway in your backyard. Just ask people in western Riverside county.

For years, folks from Corona to Perris attended public meetings staged by the Riverside County Transportation Commission (RCTC) to learn of proposals for a commuter-friendly parkway between I-15 and SR79. The option of choice for most residents was an expanded lighway 14, but what anothey getting? A massive 32-mile-freeway, much of it wider than SR-91.

The Mid County Parkway (MCP) route selected by regional and local "movers and shakers" will slice through the gently rolling lifesters and securited valleys of the Cajalco basin, one of the county's most acenic areas and home to Lake Mathews; it will cut through floodplains, habitat, riparian, and agricultural lands, destroy historical sites, and devour over 400 residential and business parcels.

Predictably, the MCP's long-awaited Draft Environmental Impact documents (EIR/EIS) describe a logistics project more focused on the movement of goods than people, its design not unlike a stunted version of the NAFTA Super Highway.

Certain declarations stand out in the 1100 page EIR/EIS; many demand correction or clarification, such as:

Recture or Fracture?— "The use of the term 'parkway'...

the life and be constitued so as to delibe the type of roadway It is
test because the public has become reconstruct to the term during
the history of the project;" Correction: The term "parkway" is the
term used by the RCTC, probably because it sounds less
threatening than "freeway."

Design Standards — "The project will be built to "meet State highway design standards," and may be designated a State highway; it "does not preclude the addition of FIOV lanes," will "include sufficient right of way to accommodate a multimodal transportation facility that includes held highway lands and a wide median that could accommodate

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a future travel larie or a transit facility." Clarification: This freeway is meant to grow! Multimodal means two -or more - modes of transportation, e.g., autos, trucks, buses, trains.

Vehicle Usage — The project will accommodate STAA National Network (larger) trucks, serve as a major restrent connection provide for "regional university of the larger and goods", and is a limited trucks, facility with 14 interchanges. Clarify against 182 with engage with State approval, and national services of longer; they are allowed to be provided the interstate and certain in the state an

Air Quality— West in the second such an intense is a second such an intense is a second such an intense is a second such as the second such as the

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officials who recently the state of the particle pollution and noted that ITC researches to the state of the

Undeniably, the MCP is a nealth disaster in the making, the communities in and around the Caialco basin placed in grants jeoparty. Only government, backett by private interests can get antisation deliberately entlangering from the communities and children and callifereness. We have the support of the trumps public safety? Until forw the support of the driver's seat.

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We are not weak if we make a pioper use of those means which the God of Nature has placed in our power... the battle, sir, is not to the strong atone, it is to the wintent. The gattle. The brave. —Patrick Henry

THE WEEK OF November 26 - December 2, 2008

Road Without Reason

(Third of a series of commentaries about the proposed Mid County "Parkway")

By Phyllis Spivey

The proposed Mid County Parkway (MCP) has generated many questions from concerned western Riverside County residents, but one that deserves top billing is rarely asked: Is it really necessary?

The Riverside County Transportation Commission (RCTC), in glossy brochures and environmental documents, emphasizes two reasons for the project: the need to serve a burgeoning population and to accommodate goods movement to and from the Perris/ Moreno Valley/March Air Reserve Base.

But, in 1999-2000, when the RCTC identified the need for a Mid County Parkway, the world was a different place – projected growth, state and regional economies all positive, trade booming – and March Air Reserve Base was on its way to becoming a major distribution center.

Even before the environmental studies for the MCP were released, however, events had overtaken the project, undermining its purpose and validity. Today, as we approach the end of 2008, directions on all fronts have dramatically reversed course and, because the problems are global in nature, they look very long-term. Therefore:

Growth projections for western Riverside County are no longer realistic. The national economy, despite massive government bailouts, is in free-fall, signs of recovery elusive. The State of California is bankrupt, considering painful budget cuts and huge tax increases, even as the deficit disease afflicts Inland Empire cities and counties. The area's jobless rate is pegged at 9.5 percent and, according to Inland economist John Husing, 80 percent of that is due to the collapse of residential construction. "This is going to be really ugly, and we're just getting started," he said.

But, even if the overall economic picture turned positive, there's that nagging water problem: not enough for the *existing* population, which is already facing more stringent conservation measures, price hikes and rationing. Inadequate water supplies will necessarily inhibit residential development and curb population growth.

March Air Reserve base is unlikely to become a major cargo hub. Political and private interests pinned their hopes for March's future on DHL, a German-based international air-carrier. Ardently courted, the global shipping giant signed a 16-year agreement in 2005 with the March Joint Powers Authority. Flawed income projections, misrepresentation of DHL's flight path and night over-flights that infuriated the public marred DHL's presence from the beginning.

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Road Without Reason

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Now, DHL is leaving, citing losses in the billions and a pull-back from the U.S. market, taking with it, according to published reports, March's best and probably last chance of ever becoming a cargo hub.

But even if DHL had not deserted March, the base's cargo hub ambitions were likely doomed by port developments in Mexico. Author Jerome Corsi reported in 2006 on Chinese plans to use Mexican ports — Manzanillo and Lazaro Cardenas — to reduce transportation costs for Far Eastern goods by 50%. Cost-savings are realized by bringing goods into the U.S. at mid-continent (Texas) and by using non-union Mexican labor in the ports, as well as for cross-border transport.

More recently, the *L.A. Times* reported (8-28-08) on Mexico's plans for the largest infrastructure project in its history, a huge Baja port, 150 miles south of the U.S. border.' Officials envision the port ultimately handling 10 million shipping containers annually, making its capacity greater than the ports of L.A. and Long Beach combined. Cargo routes into the U.S. are undetermined, but the plan is structured as a port-and-rail project. The goal? Capture some of the Pacific cargo traffic from Southern California ports and make Mexico a major player in North American logistics.

So, let's get realistic. If the MCP cannot be justified for population growth and logistics purposes, it's a road without a cause. Cancel it. Future commuter traffic in the area can be served by a widened Cajalco Road, which is already in the works. Riverside County should then follow the City of Irvine's example by barring trucks from designated expressways. In this case, route them to SR-74.

Agree? Bring your comments to Supervisor Bob Buster's MCP meeting December 2, 2008, 6:30 p.m., Citrus Valley High School, Markham & Wood Roads; or, contact Cathy Bechtel, RCTC, P.O. Box 12008, Riverside, CA 92502-2208 or (951) 787-7141.

For Comments

(Sixth in a series of commentaries about the Mid-County "Parkway")

By Phyllis Spivey

If you want to weigh in on the 32-mile Mid County "Parkway" (MCP), proposed by the Riverside County Transportation Commission (RCTC), it's time to act. The deadline for submission of comments on the project's environmental documents (Draft EIR/EIS) is January 8, 2009.

For several weeks this column has been dedicated to informing readers about issues involving the east-west corridor, attempting to highlight apparent inconsistencies, contradictions and omissions in RCTC's presentations and environmental documents. Let's review.

The MCP, from Corona to San Jacinto, will slice through hillsides and valleys of the Cajalco basin, cut through floodplains, habitat, riparian and agricultural lands, destroy historical sites, and devour over 400 residential and business parcels. Much of the deceptively-termed "parkway" will be wider than SR-91 and is designed to grow. It will be built to state standards, include sufficient right of way to accommodate a multi-medal transportation facility and trucks stretching to 75 feet or longer.

Western Riverside County already suffers from some of the worst air quality in the nation, yet the 59-page Executive Summary of the Draft EIR/EIS dismisses such concerns with a single paragraph: Long-term mobile emissions associated with the MCP ... would be lower than if the MCP were not built "due to improved traffic flow in the project area" Correction: Monster trucks are only permitted on design-appropriate roads. They cannot invade the basin if the MCP is not built.

The Draft ERE/EIS describe a logistics project more focused on the movement of goods than people, a fact many people say was never made clear at RCTC's public "outreach" meetings. Nor was it understood that, due to the location of interchanges and closure or rerouting of existing roads, travel time for folks living in the basin area might actually increase after MCP construction. If built as planned, the road would physically divide the rural communities, but not serve them, a burden without benefit.

While RCTC was presenting various "parkway" routes to the public (2004 – 2007), the frequently-quoted Inland economist John Please turn to page 2

Mid-County Parkway

Continued from page 1

Husing was hawking the cause of logistics even as officials and investors at March Air Reserve Base were working to make March a major distribution hub. Expansion plans for warehousing, rail, and transit facilities were well underway.

Denying the obvious, however, RCTC's October 2008, eight-page newsletter stated that the MCP is not a truck route. Nor could we find any references in RCTC's previous newsletters to logistics, multi-modal capabilities, or STAA (monster) trucks.

In any case, things have changed since the MCP was identified as a transportation project in 2002. DHL, the Garnian-based international air carrier, so critical to securing March's future as a major cargo hub, is pulling out of the U.S. market, reportedly taking March's best and last chance of ever becoming a cargo hub.

The idea was probably domied, anyway. Mexico is on its way to capturing Pacific cargo traffic from Southern California ports. The country's largest-ever infrastructure project, a huge Baja port just 150 miles south of the U.S. border and structured as a port-and-rail project will have a capacity greater than the ports of L.A. and Long Beach combined. And the Chinese, using ports at Manzanillo and Lazaro Cardenas, intend to bring goods into the U.S. via Texas.

If the MCP cannot be justified to accommodate cargo movement, neither can it be justified to serve a burgeoning population. Nothing is on the upswing in Riverside County but unemployment figures and, as John Husing said recently, "This is going to be really ugly, and we're just getting started." Even if the overall economic picture improved, water is in short supply. The existing population, already facing more stringent conservation measures, price hikes and rationing, will strongly oppose more residential development.

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So, the MCP is a road without a cause. Cancel it. Future community traffic in the area can be served by a widened Capales Road, which is already in the works. Bar trucks from designated expressways (following levine's example). In this case route them to SR-74, the route long preferred by local residents.

"It's not a done deal," said Supervisor Bob Buster at a December 2 "parkway" meeting. But it's up to you. RCTC tells us that all comments or questions received during the public comment period on the Draft EIR/EIS will be responded to in the final environmental documents. Preparation is expected to take several months."

Send your comments as an to Mr. Tay Dank FHWA, 650 Capitol Mall; Suite 4-100 Sacramento, CA 95814 and/or Ms. Cathy Bechtel. RCTC, P.O. Box T2008 Riverside, CA 92502-2208, or to the website di www.midcountyparkway.org