Post Office Box 51389 Riverside, California 92517-2389 January 7, 2009 HAND DELIVERED TO RCTC JANUARY 7, 2009

Riverside County Transportation Commission (RCTC) 4080 Lemon Street, 3<sup>rd</sup> Floor Post Office Box 12008 Riverside, California 92502-2208

Attention: Cathy Bechtel

Subject: Comments Regarding the Mid County Parkway (MCP)

Ms Bechtel.

The three enclosed CD-R disks contain my comments related to the three-volume Environmental Impact Report (EIR) for the proposed east-west transportation corridor commonly known as the Mid County Parkway (MCP). Each disk has been labeled with felt tip pen for your convenience. The comments can be accessed by any computer containing Adobe Reader 7.0. In all cases, the comments are identified by a yellow Note Tool flag located in the left hand margin of the EIR pages. The location of the Note Tool flag in the left hand margin will normally be adjacent to the EIR text, table, or figure that is related to the comment. The comment itself can be viewed by placing the computer's cursor on the Note Tool flag and left clicking. This will display the comment for review. Unfortunately, you may find comments that are missing a word here and there. I will take this opportunity to blame it on the limited time provided for review of the EIR. If you encounter any difficulty in determining the context of a comment, or if you have any problem viewing the comments, please contact me at 951-789-0409.

Another factor that will become obvious as you review the comments is that they are somewhat repetitive. This can be attributed to the fact that the EIR itself is quite repetitive and my intention was to ensure that all relevant issues were fully addressed each and every time they were brought up in the EIR. One significant omission deserves additional comment; the evaluation of Option 4-9, which the EIR dismissed with very little discussion. I claim no ownership of this Option; however, it does have some benefits that are discussed in my comments to the EIR and, in the context of CEQA, deserves full and serious consideration, as do the other build alternatives that were essentially dismissed by the selection of Alternative 9 TWS DV as a "locally preferred alternative". By this letter and the attached EIR comments, I am also requesting evaluation of another, similar build alternative: Option 5-9. The reason for this request is that, from the information

provided regarding impacts of the various build alternatives, it appears that Alternative 5 may result in fewer impacts than Alternative 4.

In my comments on the enclosed disks, I have provided a number of suggestions that, in my opinion, could make economic and technological sense in the current period of economic distress and limited funding. These suggestions are discussed briefly below:

- Build "No Build" Alternative 1B: To the casual observer this "No Build" alignment seems to be reasonable from an economic and technical standpoint. It uses existing Ramona Expressway/Cajalco Road right-of-way, it is technically feasible, and at an estimated cost of \$0.18 billion, it is significantly lower cost than the MCP at \$3.17 billion. Even if the \$0.18 billion estimate provided by the Riverside County Transportation Department is off by 100 percent, it is far less expensive, could be built in a much shorter time frame, and is technically feasible. While the population doubling year of 2020 and the design year of 2035 quoted in the EIR are commendable objectives, current east-west traffic is impacted today and begs for a near term solution.
- Concurrently Improve/Expand State Highway 74 The improvement/expansion of SH-74 from Hemet to Lake Elsinore via Ethanac Road could provide a parallel east-west route to "No Build" Alternative 1B. For unknown reasons, SH-74 was rejected as a build alternative for the MCP, yet improvements similar to those proposed in "No Build" Alternative 1B could reduce traffic flow on Alternative 1B and, presumably, could be accomplished in far less time and at far less cost than the proposed MCP.
- Overlay a Short Segment of the MCP on Alternative 4, 5, Option 4-9, Option 5-9, or "No Build" Alternative 1B To resolve the MSHCP issue of providing only one roadway south of Lake Mathews (Alternatives 6 and 7 have apparently been rejected due to technical issues and impacts to the Victoria Grove community) a short segment of the MCP could be constructed on existing Cajalco Road right-of-way from Gavilan Road to a point approximately 3.4 miles to the west near Lake Mathews Drive. This action would have the effect of acknowledging the MCP and also reducing the impact to the Lake Mathews MSHCP and residences in the Lake Mathews Estates.
- Reconsider Using the Existing Ramona Expressway Right-of-Way below the Perris Lake Dam – The Perris Lake Dam has created concern related to the seismic stability of the dam, which has resulted in a lowering of the water level in the lake. The EIR states that the dam structure will be reinforced to mitigate these seismic concerns in the near future. If this is in fact the case, there appears to be no reason that the MCP or "No Build"

Alternative 1B could not use the existing right-of-way for the Ramona Expressway. The significant benefit of following this route, rather than Alternative 9, would be to eliminate the extensive impact to residences and businesses in the City of Perris, the significant impacts to Paragon Park, and the potential edge effects to the Motte Rimrock Reserve.

My final comments with respect to the EIR are that it is typical of EIR's provided for most large projects. The purpose and need tend to create an environment in which many reasonable alternatives are summarily rejected because they can never meet the stated purpose and need. The document is simply too large and too verbose for any but the most disciplined and tenacious reviewers to seriously review in a limited amount of time. While I appreciate the extra 30 days afforded by the RCTC, the limited review time will never be sufficient for members of the general public. The repetitive nature of the text is also disconcerting in that there is always the nagging concern that there may be some additional nuance embedded in the wording that changes the context and needs to be examined in more detail. Lastly, the EIR is somewhat disingenuous in that it: (1) calls itself a "parkway", while acknowledging that in places it is really a freeway/expressway, and (2) seeks approval prior to requesting status as a State Highway that will ultimately permit oversized STAA trucks. Local residents have long questioned whether the MCP would be a "truck route" and the proof is now resident in the EIR. RCTC should reevaluate the need for a significant number of trucks on the MCP to support the March Global Port, given that a large deepwater port is being constructed in Mexico and may reduce activity at the ports of Los Angeles and Long Beach.

Finally, I will acknowledge that I am currently a member of the Riverside County Planning Commission; however, I am also a resident of the Gavilan Hills and the comments provided on the enclosed disks are my own as a resident and do not reflect the views of other members of the Commission. Also, some will want to classify me as a NIMBY; however, the MCP will probably not occur during my lifetime and will not affect my property, with the possible exception of nearby blasting on my water wells.

Please seriously consider the suggestions provided above and the comments provided on the enclosed disks. If you have questions regarding any of the material provided, please contact me at the address or telephone number provided above.

Respectfully,

John W. Roth