Endangered Habitats League DEDICATED TO ECOSYSTEM PROTECTION AND SUSTAINABLE LAND USE



February 15, 2013

VIA U.S. AND ELECTONIC MAIL

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



Recirculated Draft EIR/Supplemental Draft EIS (RDEIR/SDEIS) for RE: the Mid County Parkway (MCP)

Dear Ms Bechtel:

The Endangered Habitats League (EHL) appreciates the opportunity to comment on this project. As you know, EHL served on the Advisory Committees for the Community and Environmental Transportation Acceptability Process (CETAP) and Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP).

As a major east-west corridor, the MCP was an integral part of CETAP and MSHCP planning. Indeed, it was one of the "covered" infrastructure projects whose anticipated benefit from streamlined permitting supported the eventual adoption of the MSHCP. As a conservation group, we believe that, as a complex project with numerous impacts to endangered and otherwise sensitive species, major effects on wildlife movement, and cumulative and growth inducing impacts, the MCP's environmental review and mitigation is most meaningfully undertaken using the regional and habitatbased framework of the MSHCP. And as a supporter of the MSHCP, EHL expects the anticipated benefits of "tiering" and species coverage to be expeditiously realized in exchange for plan compliance.

The biological section of the RDEIR/SDEIS is thorough and appropriately focuses on MSHCP conformance. However, we suggest that the details of MSHCP conformance be made available at the earliest point prior to certification, so that there may be an opportunity for public review and comment.

Our main concern it that RCTC coordinate early and effectively with the Western Riverside County Regional Conservation Authority (RCA), U.S. Fish and Wildlife Service, and California Dept. of Fish and Wildlife. This should be approached as a partnership endeavor, with good faith exploration of options and adoption of creative ways to advance environmental benefits and project objectives. Please let me know if EHL can assist in this process.

IP-1-1

I am also copying this letter to the Board of Supervisors and the Chair and Vice Chair of the RCA Board, simply to note that the MSHCP is doing its job as a framework for the permitting of regional infrastructure and that our collective continued commitment to successful assembly of the MSCHP reserve is essential.

Yours truly,

Dan Silver

Executive Director

cc: Regional Conservation Authority
Riverside County Transportation Department
US Fish and Wildlife Service
California Dept. of Fish and Wildlife
Board of Supervisors