

2 January 2008

Ms Bechtel

RCTC

PO Box 12008

Riverside, CA 92502-2208

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RIVERSIDE COUNTY
TRANSPORTATION COMMISSION

Dear Ms Bechtel:

I am writing to comment on the Mid-County Parkway DEIR/EIS. There are many problems with the DEIR/EIS. I will focus on several of these below.

1. The proposed MCP represents segmentation of a larger project into two smaller ones, the MCP and the Irvine-Corona Expressway (ICE), a 12 mile highway/tunnel through the Santa Ana Mountains. Therefore, a Draft EIR/EIS should be reissued that includes both the MCP and the ICE.

2. This freeway will cause significant health risks for those living, attending school, and working in close proximity. As an occupational and environmental health scientist, I am very familiar with the numerous research studies published in

recent years that have demonstrated ⁽²⁾ adverse health impacts to those living within 1500 feet of freeways. Studies from UCLA have found increased risks of adverse birth outcomes such as preterm birth + low birth weight with increased exposure to traffic-related air pollution (Wilhelm + Ritz, 2003, Environmental Health Perspectives 111:207-16; Ponce et al 2005, American Journal of Epidemiology 162:140-48). In addition to pregnant women, children are also at increased risk from traffic-related air pollution near roadways. Studies have shown increased asthma attacks, deficits in lung function and growth, and disturbed immune function (Buka et al, 2006, Paediatrics Child Health, 11:513-6; Jerrett et al, 2008, Environ Health Perspect 116:4433-38; Kim et al 2008 Environ Health Perspect 116:1274-79; Wilhelm et al 2008 Environ Health Perspect 116:1254-60). These are only a few of the studies demonstrating adverse health effects of traffic-related pollution. The DEIR/EIS does not adequately address this issue. Sensitive receptors or surrogates for sensitive receptor (homes, schools, hospitals,

(3)
parks, and outdoor working places) should all be shown on MCP maps if they fall within 1500 feet of the proposed MCP, and these health impacts should be discussed.

3. The impact of the MCP on global warming was not adequately addressed in the DEIR/S. Over and over again, the building of large multi-lane freeways in California + elsewhere has led not to decreased traffic, but to increased congestion. The reasons are obvious: freeway building leads directly to new development, which leads to increased traffic.

4. The MCP is not compatible with successful implementation of the Western Riverside Multiple Species Habitat Conservation Plan (HCP). The MCP will disrupt cores, core extensions, constrained linkages, proposed linkages and non-contiguous habitat blocks that are key to the HCP.

5. The MCP will also adversely impact previously ^{established} mitigation areas such as Lake Matthews Reserve, El Sobrante, and

Estelle Mountain. These areas were ④
established as compensation for prior impacts.
There is inadequate habitat left to
mitigate for destruction of these mitigation
areas. All action alternatives will result
in net habitat loss for species such as
the Stephen's Kangaroo Rat, Quino
Checkerspot Butterfly, and California
Gnatcatcher.

I ask that you inform me of
all meetings and documents related to
the Mid-County Parkway.

Respectfully,

Ulrike Luderer

Ulrike Luderer, MD, PhD

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