

As you can see, these on/off ramps are relying on future development (whenever that might be) for their justification, and not on improving any transportation problems that exist today or that might exist in the near future. Except for Antelope Road connecting to the Ramona Expressway, these proposed on/off ramps will not be connecting to any existing roads. All of the other Mid County Parkway on/off ramps connect to existing roads (Perris Blvd., Redlands Ave., Evans Road, and Warren Road) which is the way it should be.

The justification for these five locations seems to be that it is inevitable that these developers will be allowed to construct large developments on these existing agriculture lands. It is also assumed that agriculture in this part of Riverside County is on the way out, even though time and time again the DEIR mentioned how the Riverside General Plan recommends that we should do all we can to preserve our agriculture lands, especially those that are considered Prime and Statewide Farmlands (3.2-17, 3.2-20, 3.3-13, etc.). It's ironic that the 2003 General Plan had the same assumptions concerning the inevitable loss of Agriculture lands, yet that was 10 years ago and none of the Ag lands in this area have been converted. They are still being actively farmed.

P-11-2

The agriculture land surrounding these potential on/off ramps has been farmed continuously for many years, and with a little help, these farmlands could exist for many years into the future. Unfortunately, placing these five on/off ramps at these locations will surely speed up the loss of these valuable agriculture lands. As this DEIR states; "the MCP project (especially if these five on/off ramps are not removed) would provide additional transportation system capacity and may accelerate opportunities to convert these lands to nonagricultural and urban uses..." (3.2-9). That is exactly what these five on/off ramps will do.

Town Center Blvd.:

The driving force behind the RMG, and the largest proposed development in this area, was the Villages of Lakeview Specific Plan project. In its write-up, the DEIR continues to promote this development (3.2-13, 3.25-20) as justification for at least one of the proposed on/off ramps -Town Center Blvd., even though the Villages of Lakeview project was rejected by the Riverside County Superior Court, and Riverside County was ordered to rescind all portions of the EIR. There is a big question mark (as of the release of this DEIR) as to whether the Villages of Lakeview project will ever be built. The issues that were cited for the rejection of this project were not merely cosmetic, but very significant and numerous, and will be very hard to overcome. Yet this DEIR continues to promote the Town Center Blvd on/off ramp, whose sole purpose is to provide access to the Villages of Lakeview development on both sides of the Ramona Expressway. Town Center Blvd. has no benefit to any existing roadways in the immediate area. It will dump on to existing agriculture lands, with no plans to make it a usable on/off ramp in the foreseeable future now that the Villages of Lakeview project has been rescinded.

P-11-3

The General Plan placed a Community Development Overlay over existing Ag land on the Villages of Lakeview properties. During the General Plan hearings of 2003, both the Planning Department and the Planning Commission recommended that this Ag land continue to be zoned for agriculture uses. These recommendations were overruled when the County Supervisor requested a Community Development Overlay be placed on this agriculture land. Interestingly enough, this Community Development Overlay

only covered the Villages of Lakeview Specific Plan. Now that the Villages of Lakeview project has been cancelled, the need for this Community Development Overlay is moot, and it should not be used as justification for the inevitable demise of the farmland within the overlay. Therefore the reason to keep the Town Center Blvd. on/off ramp is no longer valid. Also, unless the Villages of Lakeview has submitted the paperwork for a new or revised DEIR, any mention of this project should be removed from the Mid-County Parkway DEIR.

P-11-3

Park Center Blvd.:

Without the Villages of Lakeview, several other proposed projects associated with the RMG are now in doubt. The recent DEIR for the Motte Ranch Specific Plan project, which is now under revision, based a lot of their justification for converting existing agriculture land on the hope that the Villages of Lakeview would be built. It should be noted that the Motte Ranch Specific plan is not under any Community Development Overlay, and that the project is being planned on land recommended for agriculture uses in the General Plan. One item that affects this Mid County Parkway DEIR is that access to the Motte Ranch Specific Plan project would have been accessed from two locations; Park Center Blvd. on/off ramp, and Town Center Blvd. on/off ramp. Since access to the Town Center Blvd. on/off ramp for the Motte Ranch project has to go through the Villages of Lakeview, the viability of the Motte Ranch Specific Plan is very much in doubt. The Motte Ranch project cannot utilize Bridge Street as their second access road because they are not allowed to cross over the MSHCP's Constrained Linkage 20 (MSHCP Section 3.0). Because of this, and many other issues, the Motte Ranch Specific Plan may never be approved. Therefore, the reason to keep the Park Center Blvd. on/off ramp is very much in doubt.

P-11-4

Take a look at Figure 3.17.1 and 3.17.2. Almost all of the land on the north side of Ramona Expressway from Lake Perris to Bridge Street is included in the SJWA, Extension of Core 4, and the Constrained Linkage 20. Only the agriculture buffer areas found in the proposed Villages of Lakeview and Motte Ranch Specific Plans are not protected from development. The Villages of Lakeview project is dead in the water. To encourage high density development in these two small locations by constructing the Town Center and Park Center on/off ramps is a bad idea. If these developments are not built, these two on/off ramps will go nowhere. These two roads will never be extended to the north into the protected wildlife areas, so why include these on/off ramps in the Mid County Parkway design?

P-11-5

Reservoir, Bernasconi and Antelope Roads:

The DEIR states that other projects, some of which might have been part of the RMG and were used to determine future on/off ramps for the Mid County Parkway, have been withdrawn (3.2-5). The justification for the locations of these proposed on/off ramps is now very much in question. Let's review the Cumulative Projects Map (Figure 3.25.1) in the Mid County Parkway DEIR. The number of errors on this map is amazing. The Cumulative Projects Map states that the majority of the proposed developments are "Project Approved". This is totally incorrect. The Motte Ranch Specific Plan (#1 on the attached map) has not been approved and never has been. The Villages of Lakeview Specific Plan (#2 on the attached map) has been rescinded and is no longer "approved". To my knowledge, almost all of the proposed developments along the San Jacinto River that would utilize the Antelope,

P-11-6

Bernasconi, and Reservoir on/off ramps (#3 on the attached map) have never been approved. The area north of Ramona Expressway (#4 on the attached map) has never even been submitted for a development. It was just recently offered to the local Resource Conservation District as a conservation easement. One part of this DEIR states that many projects have been withdrawn, but the Cumulative Projects Map shows all of these projects as approved. One might get the impression that this DEIR is trying to justify these five on/off ramps with misleading and incorrect information. A revised Cumulative Projects map must be developed with the correct status of any and all development projects within this area including the names of each project. This will allow the public to determine if any or all of these on/off ramps are needed.

P-11-6

The MSHCP has the "Extension of Existing Core 4" as one of its major linkages to the San Jacinto Wildlife Area (SJWA). The General Plan calls for the linkage to include approximately 3,330 acres between the Ramona Expressway and Nuevo Road. If this acreage was placed uniformly, it would cover about 2,250 feet on each side of the river (see attached map). The DEIR states that a "Core Area is a block of habitat of appropriate size, configuration and vegetation characteristics to generally support the life history requirements of one or more species covered by the MSHCP". Looking at the DEIR's "Critical Habitat Areas and Listed Species Map" (Figure 3.21.1), several habitats for these species cover a wide area that would require a maximum width of the Core 4 Extension. To meet this requirement, the Core 4 must have a large, uniform size without urban intrusions or levee construction. The Cumulative Projects Map shows many projects within the Core 4 Extension area.

P-11-7

The existing 100-year Flood Plain in this location covers almost the same acreage as the Core 4 Extension. To my knowledge, the Riverside County Flood Control has no plans to channelize this stretch of the San Jacinto River. On the Cumulative projects map, the proposed projects located just west of the proposed Reservoir on/off ramp, and the large area of proposed projects west of the San Jacinto River between Ramona expressway and Nuevo Road, have a significant amount of their projects within the 100-year floodplain. For that reason, many of these projects may never be viable, and that brings into question the need for these three on/off ramps. The DEIR must include a map showing the potential location of the Extension of the Existing Core 4, and a map showing the 100-year flood plain overlaying the potential developments in this area. That will allow the public to determine if all of these projects are feasible under their current design and whether the on/off ramps are needed.

P-11-8

Another significant point that this DEIR does not consider (and neither did the proposed development projects shown on the Cumulative Projects map) is the value of the surrounding agriculture lands and the many positive affects this land has on the San Jacinto Wildlife Area (SJWA), the center point of the County's MSHCP. These Ag lands provide food, habitat, and an invaluable buffer between the SJWA and the existing communities of Lakeview and Nuevo. These Ag buffers around the SJWA reduce urban noises, light pollution, unwanted vehicle traffic, domesticated animal intrusions, trespassing, water and air pollution, and other urban problems. As an example, recently the rare Tri-colored Blackbird has several times been found nesting in the surrounding agriculture lands, instead of within the SJWA. Without these surrounding Ag lands, the survival of this unique species would have been in doubt. Unfortunately, these developments all propose to eliminate all of the surrounding Ag land and build up next to the San Jacinto Wildlife Area.

P-11-9

These five on/off ramps, if constructed in the near future, would literally lead to nowhere. If these on/off ramps sites are constructed at the proposed locations, the Mid County Parkway would be the single most significant reason for the loss of this valuable agriculture resource (3.2-9), one that this DEIR and the County General Plan states over and over again, should be preserved if at all possible (3.2-17, 3.2-20, 3.3-13, etc.).

P-11-10

The RCTC would be much better off by eliminating these five on/off ramp sites and instead construct their on/off ramps to connect to existing roads in the Lakeview/Nuevo Area. This would give the Ag land a better chance to survive, and it would be a direct benefit to the Core 4 Wildlife Corridor, the Constrained Linkage 20 corridor, the SJWA, and a much better benefit to the existing Lakeview/Nuevo residents. Constructing on/off ramps at Warren Road and one at the existing Hansen Ave/Davis Road intersection would be a much better solution. A Bridge Street connection may be viable, but the Constrained Linkage 20 underpass would have to be redesigned. No other on/off ramps are needed until the Parkway enters the Perris Valley.

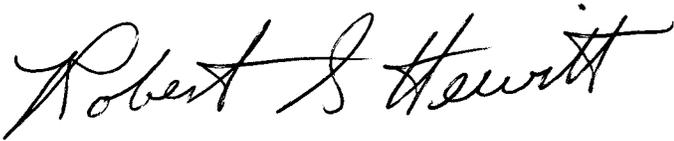
P-11-11

Proposed Constrained Linkage 20

The Proposed Linkage 20 is designed to help facilitate the movement of wildlife from the mountains to the San Jacinto River. This wildlife crossing must protect the wildlife from entering on to the Mid County Parkway. The DEIR map showing this proposed crossing should have a detailed description of the fencing needed to keep all wildlife off the Parkway and directed into the underpass. Typical freeway fencing for the Parkway within this corridor will not be adequate. The openings in the fence must be small enough to keep even the small wildlife from passing through it. Also, this special fencing must be extended the full width of the proposed Constrained Linkage 20 corridor. The fencing would be approximately 2,400 feet in width and be located on both the north and south sides of the Parkway.

P-11-12

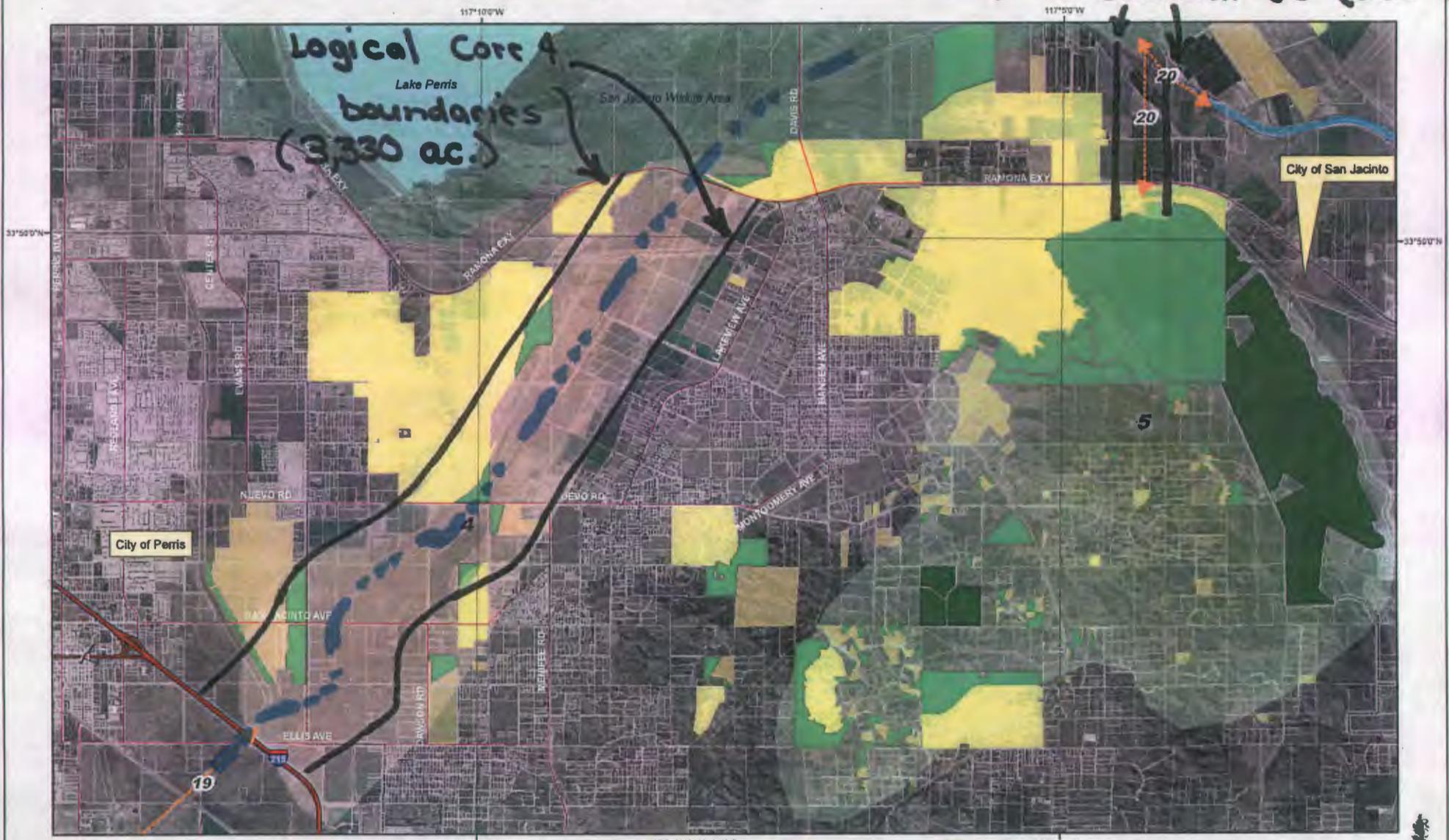
Sincerely,



Robert S. Hewitt
42913 Johnston Ave.
Hemet, Ca. 92544

Logical Linkage 20 boundaries (330 ac)

MSHCP Core 4 Extension and Constrained Linkage 20

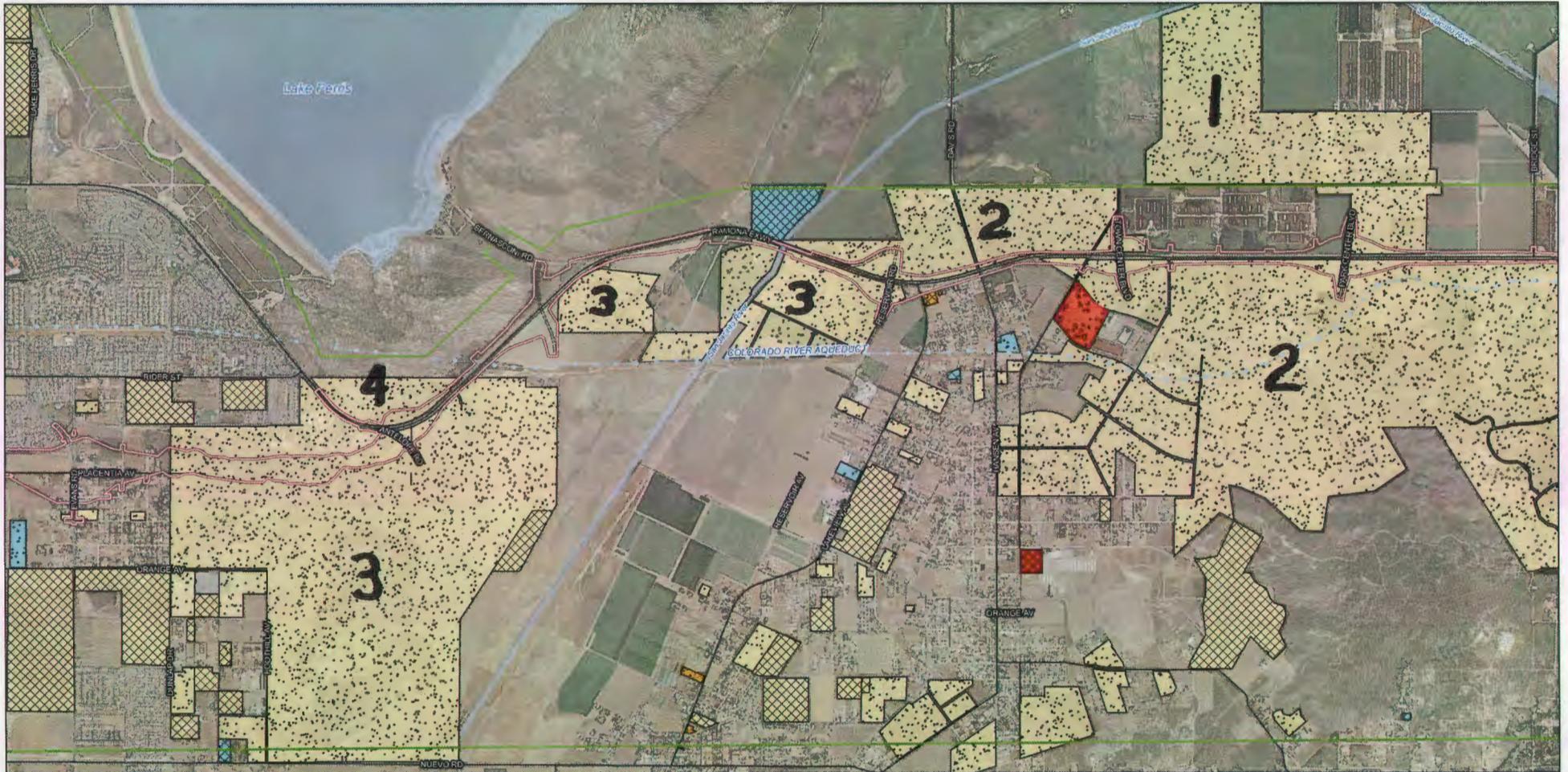


December 2007

- Constrained Linkage (Proposed)
- RCA MSHCP ACQUIRED PROPERTIES
- JPR / HANS Activity Proposed Development
- Proposed Extension of Existing Cores
- Constrained Linkage (Existing)
- Proposed MSHCP Conservation Area
- New/Original Habitat Stock
- Core (Existing)

Refer to comments P-11-1 and P-11-12





LEGEND

- Limits of Proposed Improvements (All Alternatives and Design Variations)
- MCP Study Area
- Perris Valley Pipeline Project
- Proposed Perris Valley Rail Extension
- Perris Valley Storm Drain and Colorado Aqueduct

Development by Type

- Commercial
- Industrial
- Residential
- Other

Development by Status

- Application Submitted
- Project Approved

SOURCE: Jacobs Engineering (02/2011); Thomas Brothers (2010); SCAG (2005); Eagle Aerial (3/2010)



FIGURE 3.25.1
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Cumulative Projects

08-RIV-MCP PM 0.0/16.3; 08-RIV-215 PM 28.0/34.3
EA 08-0F3200 (PN 080000125)

