



Charissa Leach
Director

RIVERSIDE COUNTY PLANNING DEPARTMENT

Agency Notice of Preparation of a Draft Environmental Impact Report

DATE: March 2, 2023

TO: Responsible/Trustee Agencies

The Riverside County Planning Department is currently reviewing a development application (herein, "Project") in the Lake Matthews/Woodcrest Area Plan of Riverside County. The Project is subject to compliance with the California Environmental Quality Act (CEQA). This notice is to inform public agencies and the general public that an Environmental Impact Report (EIR) will be prepared for the Project, and to solicit input as to the scope and content of the required EIR.

PROJECT CASE NO./TITLE: Arroyo Vista – General Plan Amendment No. 220009 (GPA220009), Change of Zone No. 2200031 (CZ2200031), and Tentative Tract Map No. 38510 (TTM38510)

PROJECT LOCATION AND DESCRIPTION: The proposed Project consists of applications for a General Plan Amendment (GPA220009), Change of Zone (CZ2200031), and Tentative Tract Map (TTM38510) to allow for the development of 232 single-family dwelling units on a 140.8-acre property located at the northwest corner of Iris Avenue and Chicago Avenue in the Lake Matthews/Woodcrest community of unincorporated Riverside County.

GPA220009 is a proposal to change the site's General Plan land use designation from "Rural Community – Very Low Density Residential (RC-VLDR)" to "Rural Community – Low Density Residential (RC-LDR)." CZ2200031 is a proposal to change the site's zoning classification from "Light Agriculture, 10-Acre Minimum Lot Size (A-1-10)" to "One Family Dwellings, 10,000 square-foot (s.f.) minimum lot size (R-1-10,000)." TTM38510 is a proposal to subdivide the 140.8-acre property to develop 232 residential lots on approximately 87.7 acres, open space (including a trailhead) on approximately 25.0 acres, water quality basins on 4.9 acres, a sewer lift station on 0.25 acre, and street improvements and right-of-way dedications on 23.0 acres. Governmental approvals requested by the Project Applicant from Riverside County to implement the Project consist of the following:

1. Adoption by resolution of General Plan Amendment No. 220009 (GPA220009)
2. Adoption by ordinance of Change of Zone No. 2200031 (CZ2200031)
3. Adoption by resolution of Tentative Tract Map No. 38510 (TTM38510)

LEAD AGENCY:

Riverside County Planning Department
4080 Lemon Street, 12th Floor
P.O. Box 1409
Riverside, CA 92502-1409
Attn: Krista Mason, Urban Regional Planner IV

PROJECT SPONSOR:

Applicant: TTLC Riverside Chicago, LLC
Attn: Michael Torres
Address: 4350 Von Karman Avenue, Suite 200
Newport Beach, CA 92660

Pursuant to the California Environmental Quality Act, notice is given to responsible and interested agencies, that the Riverside County Planning Department plans to oversee the preparation on an Environmental Impact Report for the above-described project. The purpose of this notice is to solicit guidance from your agency as to the scope and content of the environmental information to be included in the EIR. Information in that regard should be submitted to this office as soon as possible, but **not later than April 3, 2023 or thirty (30) days** after receiving this notice.

Riverside Office · 4080 Lemon Street, 12th Floor
P.O. Box 1409, Riverside, California 92502-1409
(951) 955-3200 · Fax (951) 955-1811

Desert Office · 77-588 El Duna Court, Suite H
Palm Desert, California 92211
(760) 863-8277 · Fax (760) 863-7555

"Planning Our Future... Preserving Our Past"

SCOPE OF ANALYSIS: It is anticipated that the proposed Project would have the potential to result in significant impacts under the following issue areas. A detailed analysis of the following issue areas will be included in the forthcoming EIR:

- Aesthetics
- Agriculture & Forest Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology / Soils
- Greenhouse Gas Emissions
- Hazards & Hazardous Materials
- Hydrology / Water Quality
- Land Use / Planning
- Mineral Resources
- Noise
- Paleontological Resources
- Population / Housing
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities / Service Systems
- Wildfire
- Mandatory Findings of Significance

PUBLIC SCOPING MEETING: A scoping meeting has been scheduled to include affected federal, State and local agencies, the proponent of the proposed Project, and other interested persons, to solicit input regarding the scope and content of information to be included in the EIR; as well as inform the public of the nature and extent of the proposed project, and to provide an opportunity to identify the range of actions, alternatives, mitigation measures, and significant effects to be analyzed in depth in the EIR and help eliminate from detailed study issues found not to be important. The scoping meeting is not a public hearing on the merit of the proposed project and NO DECISION on the Project will be made. Public testimony is limited to identifying issues regarding the project and potential environmental impacts. The Project proponent will not be required to provide an immediate response to any concerns raised. The Project proponent will be requested to address any concerns expressed at the scoping meeting through revisions to the proposed Project and/or completion of a Final Environmental Impact Report, prior to the formal public hearing on the proposed Project. Mailed notice of the public hearing will be provided to anyone requesting such notification.

DATE OF SCOPING MEETING: APRIL 3, 2023

TIME OF SCOPING MEETING: 1:30 PM or as soon as possible thereafter

Information on how to participate in the hearing will be available on the Planning Department website at: <https://planning.rctlma.org/>. For further information regarding this project please contact Krista Mason, Urban and Regional Planner IV at (951) 955-1722 or email at kmason@rivco.org, or go to the County Planning Department's public hearing agenda web page at <http://planning.rctlma.org/PublicHearings.aspx>.

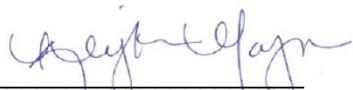
Please send all written correspondence to:

RIVERSIDE COUNTY PLANNING DEPARTMENT
Attn: Krista Mason, Urban and Regional Planner IV
P.O. Box 1409, Riverside, CA 92502-1409

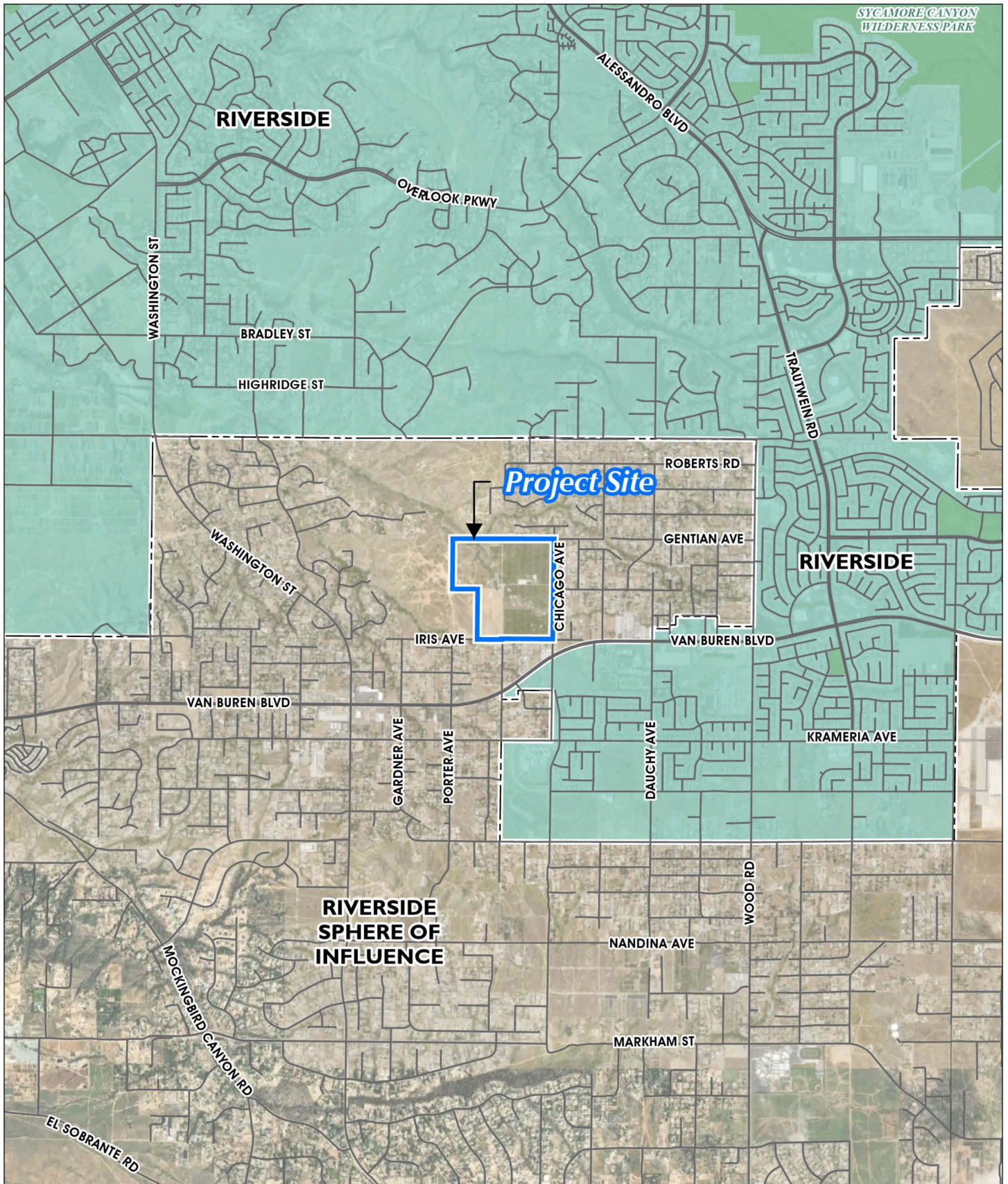
If you have any questions, please contact Krista Mason, Urban Regional Planner IV at (951) 955-1722.

Sincerely,

RIVERSIDE COUNTY PLANNING DEPARTMENT



Krista Mason, Urban Regional Planner IV for John Hildebrand, Planning Director

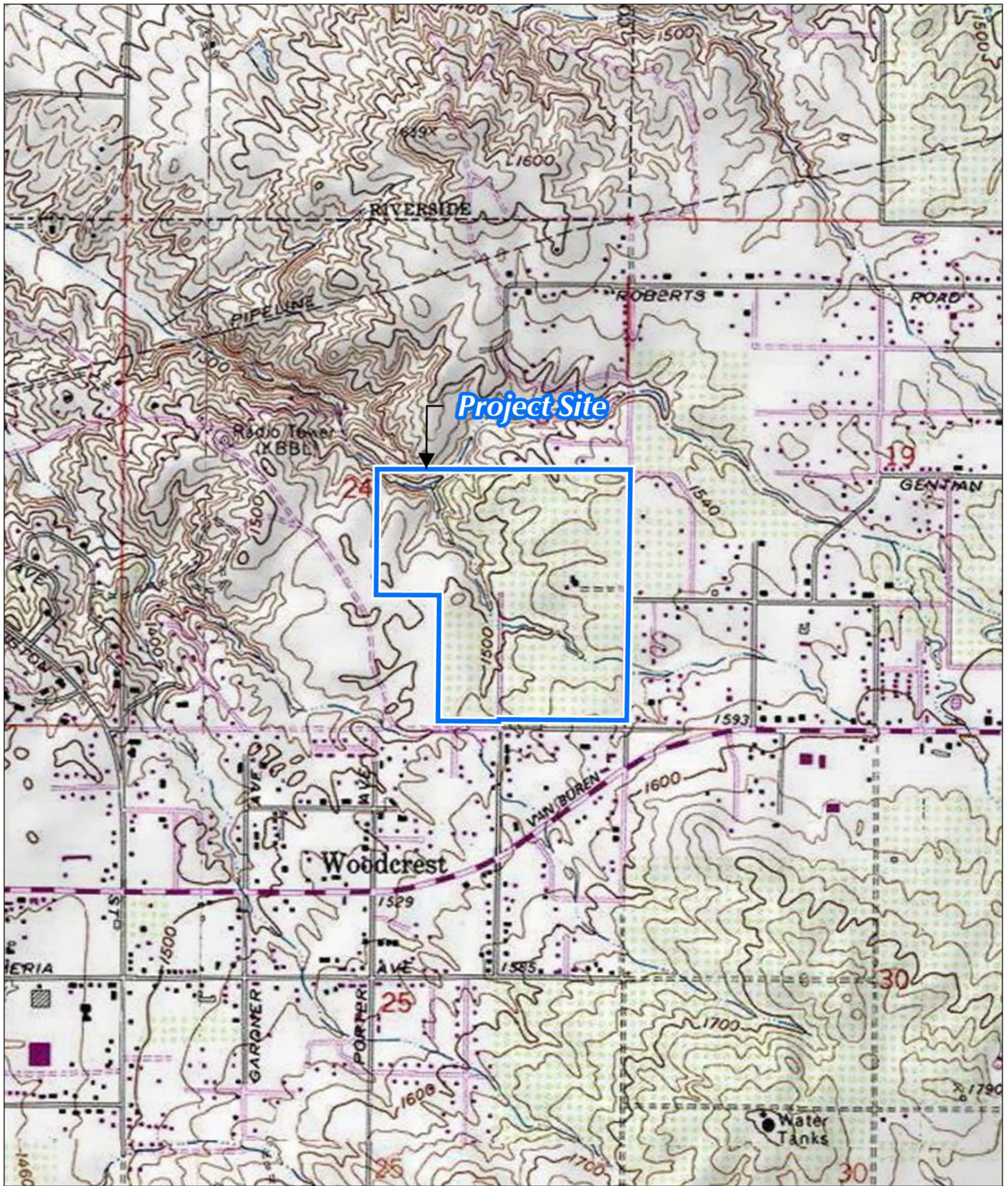


Source(s): Esri, Nearmap Imagery (2023), RCIT (2023)

Figure 1



Vicinity Map



Source(s): Esri, USGS (2013)

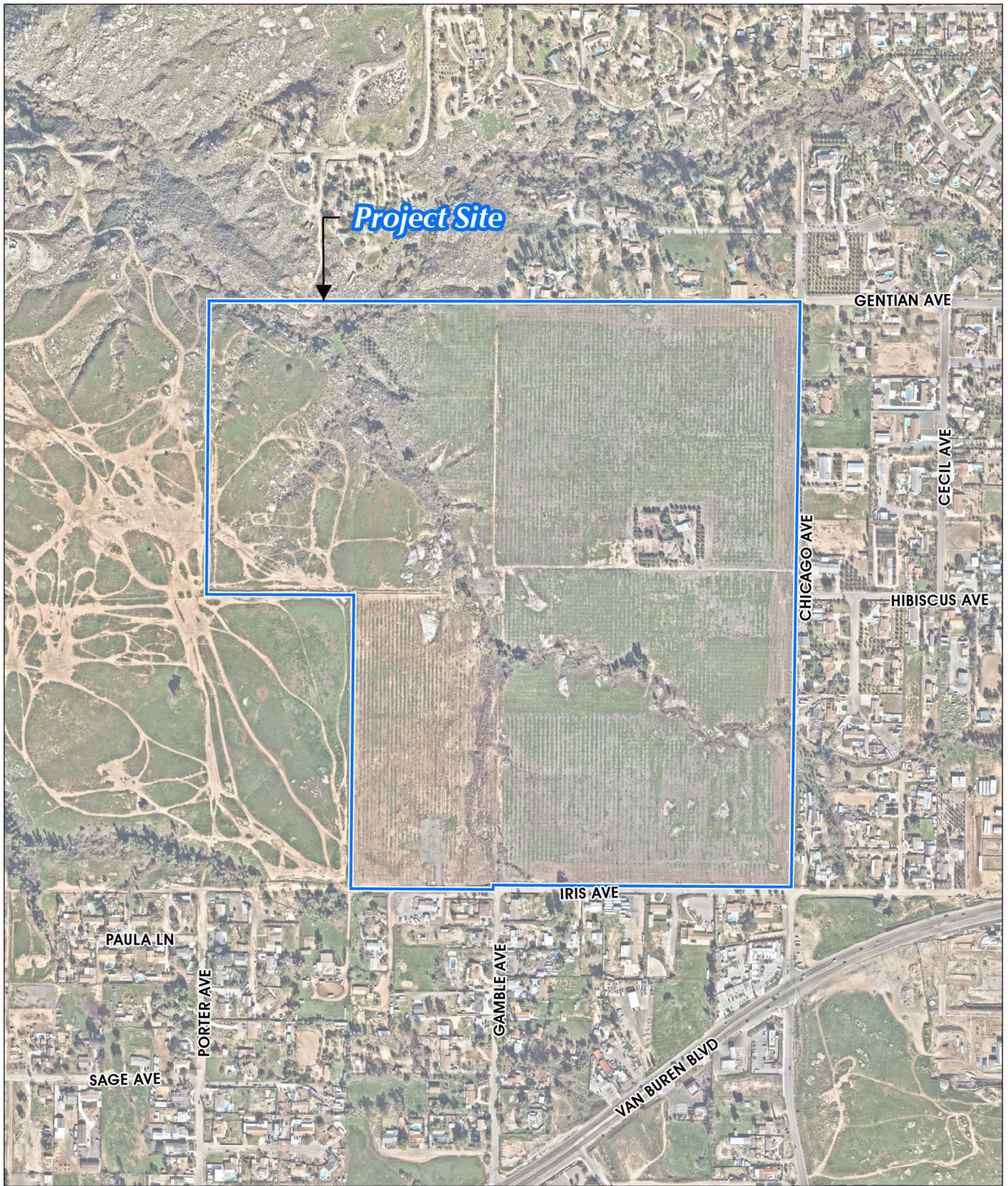
Figure 2



USGS Topographic Map

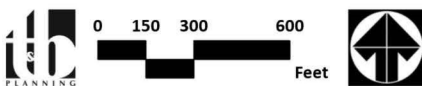
Arroyo Vista

JN: 1214-001
Date: 02-21-2023



Source(s): Esri, Nearmap Imagery (2023)

Figure 3



OWNER
P & T INVESTMENT COMPANY
11100 POWER BLVD., SUITE 200
ARROYO VISTA, CA 92010
PHONE (619) 751-4352
CONTACT: RICHARD TORRES

APPLICANT
TILE INVESTMENT COMPANY, LLC
11100 POWER BLVD., SUITE 200
ARROYO VISTA, CA 92010
PHONE (619) 751-4352
CONTACT: RICHARD TORRES

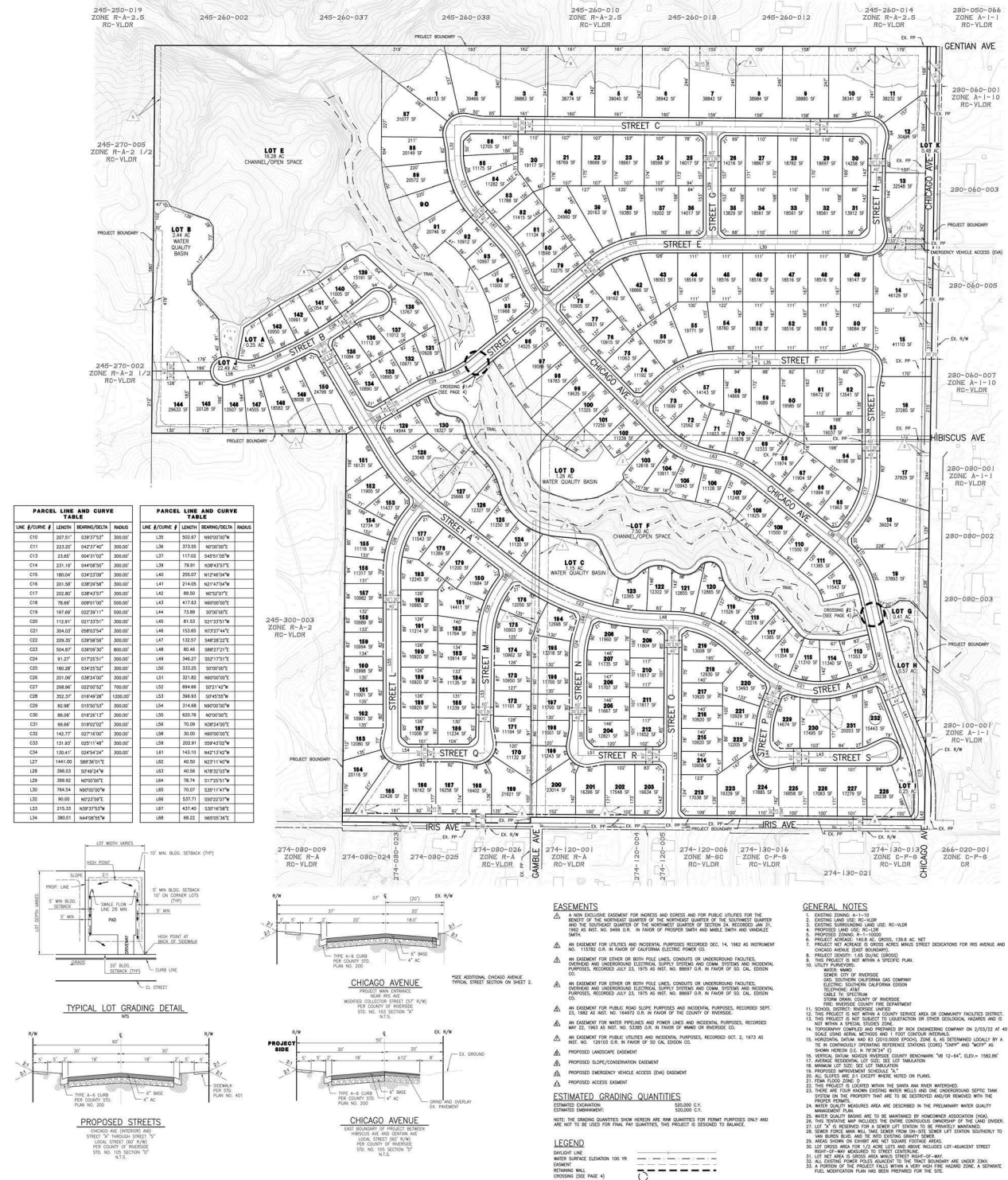
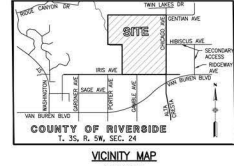
ENGINEER
RICK ENGINEERING COMPANY
1700 SAN ANTONIO AVE., SUITE 100
RIVERSIDE, CA 92507
PHONE (951) 782-0007
CONTACT: RICHARD TORRES

IN THE COUNTY OF RIVERSIDE, CALIFORNIA
TENTATIVE TRACT MAP 38510
JANUARY 25, 2023

ACCESSOR'S PARCEL NUMBERS
245-300-001, 245-300-004

LEGAL DESCRIPTION

THE SOUTHWEST QUARTER OF SECTION 24, TOWNSHIP 3 SOUTH, RANGE 1 WEST, SAN BERNARDINO BASIN AND ADJACENT ACCORDING TO THE OFFICIAL PLAT RECORDS;
EXCEPTING THEREFROM THE SOUTHWEST QUARTER OF SAID SECTION 24;
ALSO EXCEPTING THEREFROM THE SOUTHWEST 20 FEET OF THE SOUTHWEST QUARTER OF THE SOUTHWEST QUARTER OF SAID 24, 40 ACRES (IN ACCORDANCE WITH A DEED TO THE COUNTY OF RIVERSIDE, RECORDED JUNE 2, 1971 AS INSTRUMENT NO. 2870 OF OFFICIAL RECORDS OF RIVERSIDE COUNTY, CALIFORNIA)



Notice of Completion & Environmental Document Transmittal

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613

For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

SCH #**Project Title:** Arroyo Vista - General Plan Amendment No. 220009, Change of Zone No. 2200031, and Tentative Tract Map No. 38510Lead Agency: Riverside CountyContact Person: Krista Mason, Project PlannerMailing Address: P.O. Box 1409Phone: (951) 955-3200City: RiversideZip: 92502County: Riverside County**Project Location:** County: Riverside County City/Nearest Community: Lake Matthews/Woodcrest CommunityCross Streets: Northwest corner of Iris Avenue at Chicago AvenueZip Code: 92508Longitude/Latitude (degrees, minutes and seconds): 33 ° 53 ' 26 " N / 117 ° 21 ' 07 " W Total Acres: 140.8Assessor's Parcel No.: 245-300-001 and 245-300-004Section: 24Twp.: 3SRange: 5WBase: San BernardinoWithin 2 Miles: State Hwy #: NoneWaterways: NoneAirports: NoneRailways: NoneSchools: See Attachment**Document Type:**CEQA: ☒ NOP☐ Draft EIRNEPA: ☐ NOIOther: ☐ Joint Document☐ Early Cons☐ Supplement/Subsequent EIR☐ EA☐ Final Document☐ Neg Dec

(Prior SCH No.) _____

☐ Draft EIS☐ Other: _____☐ Mit Neg Dec

Other: _____

☐ FONSI**Local Action Type:**☐ General Plan Update☐ Specific Plan☒ Rezone☐ Annexation☒ General Plan Amendment☐ Master Plan☐ Prezone☐ Redevelopment☐ General Plan Element☐ Planned Unit Development☐ Use Permit☐ Coastal Permit☐ Community Plan☐ Site Plan☒ Land Division (Subdivision, etc.)☐ Other: _____**Development Type:**☒ Residential: Units 232 Acres 87.7☐ Office: Sq.ft. _____ Acres _____ Employees _____☐ Transportation: Type _____☐ Commercial: Sq.ft. _____ Acres _____ Employees _____☐ Mining: Mineral _____☐ Industrial: Sq.ft. _____ Acres _____ Employees _____☐ Power: Type _____ MW _____☐ Educational: _____☐ Waste Treatment: Type _____ MGD _____☐ Recreational: _____☐ Hazardous Waste: Type _____☐ Water Facilities: Type _____ MGD _____☐ Other: _____**Project Issues Discussed in Document:**☒ Aesthetic/Visual☐ Fiscal☒ Recreation/Parks☒ Vegetation☒ Agricultural Land☒ Flood Plain/Flooding☒ Schools/Universities☒ Water Quality☒ Air Quality☒ Forest Land/Fire Hazard☐ Septic Systems☒ Water Supply/Groundwater☒ Archeological/Historical☒ Geologic/Seismic☒ Sewer Capacity☒ Wetland/Riparian☒ Biological Resources☒ Minerals☒ Soil Erosion/Compaction/Grading☒ Growth Inducement☐ Coastal Zone☒ Noise☒ Solid Waste☒ Land Use☒ Drainage/Absorption☒ Population/Housing Balance☒ Toxic/Hazardous☒ Cumulative Effects☐ Economic/Jobs☒ Public Services/Facilities☒ Traffic/Circulation☐ Other: _____**Present Land Use/Zoning/General Plan Designation:**

Agriculture (Orchards)/Light Agriculture, 10-Acre Min. Lot Size (A-1-10)/Rural Community – Very Low Density Residential (RC-VLDR)

Project Description: (please use a separate page if necessary)

See Attachment

Reviewing Agencies Checklist

Lead Agencies may recommend State Clearinghouse distribution by marking agencies below with an "X".
If you have already sent your document to the agency please denote that with an "S".

<input checked="" type="checkbox"/> Air Resources Board	<input type="checkbox"/> Office of Historic Preservation
<input type="checkbox"/> Boating & Waterways, Department of	<input type="checkbox"/> Office of Public School Construction
<input type="checkbox"/> California Emergency Management Agency	<input type="checkbox"/> Parks & Recreation, Department of
<input type="checkbox"/> California Highway Patrol	<input type="checkbox"/> Pesticide Regulation, Department of
<input checked="" type="checkbox"/> Caltrans District # 8	<input type="checkbox"/> Public Utilities Commission
<input type="checkbox"/> Caltrans Division of Aeronautics	<input checked="" type="checkbox"/> Regional WQCB # 8
<input type="checkbox"/> Caltrans Planning	<input type="checkbox"/> Resources Agency
<input type="checkbox"/> Central Valley Flood Protection Board	<input type="checkbox"/> Resources Recycling and Recovery, Department of
<input type="checkbox"/> Coachella Valley Mtns. Conservancy	<input type="checkbox"/> S.F. Bay Conservation & Development Comm.
<input type="checkbox"/> Coastal Commission	<input type="checkbox"/> San Gabriel & Lower L.A. Rivers & Mtns. Conservancy
<input type="checkbox"/> Colorado River Board	<input type="checkbox"/> San Joaquin River Conservancy
<input checked="" type="checkbox"/> Conservation, Department of	<input type="checkbox"/> Santa Monica Mtns. Conservancy
<input type="checkbox"/> Corrections, Department of	<input type="checkbox"/> State Lands Commission
<input type="checkbox"/> Delta Protection Commission	<input type="checkbox"/> SWRCB: Clean Water Grants
<input type="checkbox"/> Education, Department of	<input type="checkbox"/> SWRCB: Water Quality
<input type="checkbox"/> Energy Commission	<input type="checkbox"/> SWRCB: Water Rights
<input checked="" type="checkbox"/> Fish & Game Region # 6	<input type="checkbox"/> Tahoe Regional Planning Agency
<input type="checkbox"/> Food & Agriculture, Department of	<input checked="" type="checkbox"/> Toxic Substances Control, Department of
<input type="checkbox"/> Forestry and Fire Protection, Department of	<input type="checkbox"/> Water Resources, Department of
<input type="checkbox"/> General Services, Department of	<input type="checkbox"/> Other: _____
<input type="checkbox"/> Health Services, Department of	<input type="checkbox"/> Other: _____
<input type="checkbox"/> Housing & Community Development	
<input checked="" type="checkbox"/> Native American Heritage Commission	

Local Public Review Period (to be filled in by lead agency)

Starting Date _____ Ending Date _____

Lead Agency (Complete if applicable):

Consulting Firm: T&B Planning, Inc.	Applicant: TTLC Riverside Chicago, LLC
Address: 3200 El Camino Real, Suite 100	Address: 4350 Von Karman Avenue, Suite 200
City/State/Zip: Irvine, CA 62602	City/State/Zip: Newport Beach, CA 92660
Contact: Jerrica Harding, AICP	Phone: (925) 331-7006
Phone: (714) 505-6360 ext. 101	

Signature of Lead Agency Representative: _____ Date: _____

Authority cited: Section 21083, Public Resources Code. Reference: Section 21161, Public Resources Code.

**SUPPLEMENTAL INFORMATION FOR NOTICE OF COMPLETION & ENVIRONMENTAL DOCUMENT
TRANSMITTAL AND
SUMMARY FORM FOR ELECTRONIC DOCUMENT SUBMITTAL (FORM F)**

***Arroyo Vista – General Plan Amendment No. 220009, Change of Zone No. 2200031, and Tentative
Tract Map No. 38510***

Schools within 2 Miles

Woodcrest Elementary School, Frank Augustus Miller Middle School, Mark Twain Elementary School, Martin Luther King High School, Woodcrest Christian, Benjamin Franklin Elementary School, and Amelia Earhart Middle School.

Project Description

The proposed Project consists of applications for a General Plan Amendment (GPA220009), Change of Zone (CZ2200031), and Tentative Tract Map (TTM38510) to allow for the development of 232 single-family dwelling units on a 140.8-acre property located at the northwest corner of Iris Avenue and Chicago Avenue in the Lake Matthews/Woodcrest community of unincorporated Riverside County. GPA220009 is a proposal to change the site's General Plan land use designation from "Rural Community – Very Low Density Residential (RC-VLDR)" to "Rural Community – Low Density Residential (RC-LDR)." CZ2200031 is a proposal to change the site's zoning classification from "Light Agriculture, 10-Acre Minimum Lot Size (A-1-10)" to "One Family Dwellings, 10,000 square-foot (s.f.) minimum lot size (R-1-10,000)." TTM38510 is a proposal to subdivide the 140.8-acre property to develop 232 residential lots on approximately 87.7 acres, open space (including a trailhead) on approximately 25.0 acres, water quality basins on 4.9 acres, a sewer lift station on 0.25acre, and street improvements and right-of-way dedications on 23.0 acres. Governmental approvals requested by the Project Applicant from Riverside County to implement the Project consist of the following:

1. Adoption by resolution of General Plan Amendment No. 220009 (GPA220009)
2. Adoption by ordinance of Change of Zone No. 2200031 (CZ2200031)
3. Adoption by resolution of Tentative Tract Map No. 38510 (TTM38510)

Notice of Preparation

Notice of Preparation

To: State Clearinghouse

1400 Tenth Street

Sacramento, CA 95814

(Address)

From: Riverside County Planning Department

P.O. Box 1409

Riverside, CA 92502

(Address)

Subject: **Notice of Preparation of a Draft Environmental Impact Report**

Riverside County

_____ will be the Lead Agency and will prepare an environmental impact report for the project identified below. We need to know the views of your agency as to the scope and content of the environmental information which is germane to your agency's statutory responsibilities in connection with the proposed project. Your agency will need to use the EIR prepared by our agency when considering your permit or other approval for the project.

The project description, location, and the potential environmental effects are contained in the attached materials. A copy of the Initial Study (☐ is ☒ is not) attached.

Due to the time limits mandated by State law, your response must be sent at the earliest possible date but not later than 30 days after receipt of this notice.

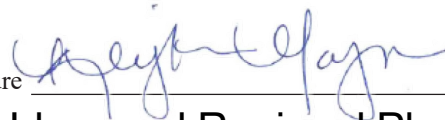
Please send your response to Krista Mason (Urban and Regional Planner IV) at the address shown above. We will need the name for a contact person in your agency.

Project Title: Arroyo Vista (GPA220009, CZ2200031, TTM38510)

Project Applicant, if any: TTLC Riverside Chicago, LLC

Date March 02, 2023

Signature



Title

Urban and Regional Planner IV

Telephone

(951) 955-1722

Reference: California Code of Regulations, Title 14, (CEQA Guidelines) Sections 15082(a), 15103, 15375.

Summary Form for Electronic Document Submittal

Form F

Lead agencies may include 15 hardcopies of this document when submitting electronic copies of Environmental Impact Reports, Negative Declarations, Mitigated Negative Declarations, or Notices of Preparation to the State Clearinghouse (SCH). The SCH also accepts other summaries, such as EIR Executive Summaries prepared pursuant to CEQA Guidelines Section 15123. Please include one copy of the Notice of Completion Form (NOC) with your submission and attach the summary to each electronic copy of the document.

SCH #: _____

Project Title: Arroyo Vista (GPA220009, CZ2200031, TTM38510)

Lead Agency: Riverside County

Contact Name: Krista Mason

Email: kmason@rivco.org

Phone Number: (951) 955-1722

Project Location: Northwest corner of Iris Avenue and Chicago Avenue,
City

Riverside County
County

Project Description (Proposed actions, location, and/or consequences).

The proposed Project consists of applications for a General Plan Amendment (GPA220009), Change of Zone (CZ2200031), and Tentative Tract Map (TTM38510) to allow for the development of 232 single-family dwelling units on a 140.8-acre property located at the northwest corner of Iris Avenue and Chicago Avenue in the Lake Matthews/Woodcrest community of unincorporated Riverside County. GPA220009 is a proposal to change the site's General Plan land use designation from "Rural Community – Very Low Density Residential (RC-VLDR)" to "Rural Community – Low Density Residential (RC-LDR)." CZ2200031 is a proposal to change the site's zoning classification from "Light Agriculture, 10-Acre Minimum Lot Size (A-1-10)" to "One Family Dwellings, 10,000 square foot (s.f.) minimum lot size (R-1-10,000)." TTM38510 is a proposal to subdivide the 140.8-acre property to develop 232 residential lots on approximately 87.7 acres, open space (including a trailhead) on approximately 25.0 acres, water quality basins on 4.9 acres, a sewer lift station on 0.25 acre, and street improvements and right-of-way dedications on 23.0 acres.

Identify the project's significant or potentially significant effects and briefly describe any proposed mitigation measures that would reduce or avoid that effect.

The Draft EIR shall address the following environmental subject areas: Aesthetics; Agriculture and Forest Resources; Air Quality; Biological Resources; Cultural Resources; Energy; Geology and Soils; Greenhouse Gas Emissions; Hazards and Hazardous Materials; Hydrology and Water Quality; Land Use and Planning; Mineral Resources; Noise; Paleontological Resources; Population and Housing; Public Services; Recreation; Transportation; Tribal Cultural Resources; Utilities and Service Systems; and Wildfire. Mitigation measures, if required, will be identified by the forthcoming EIR.

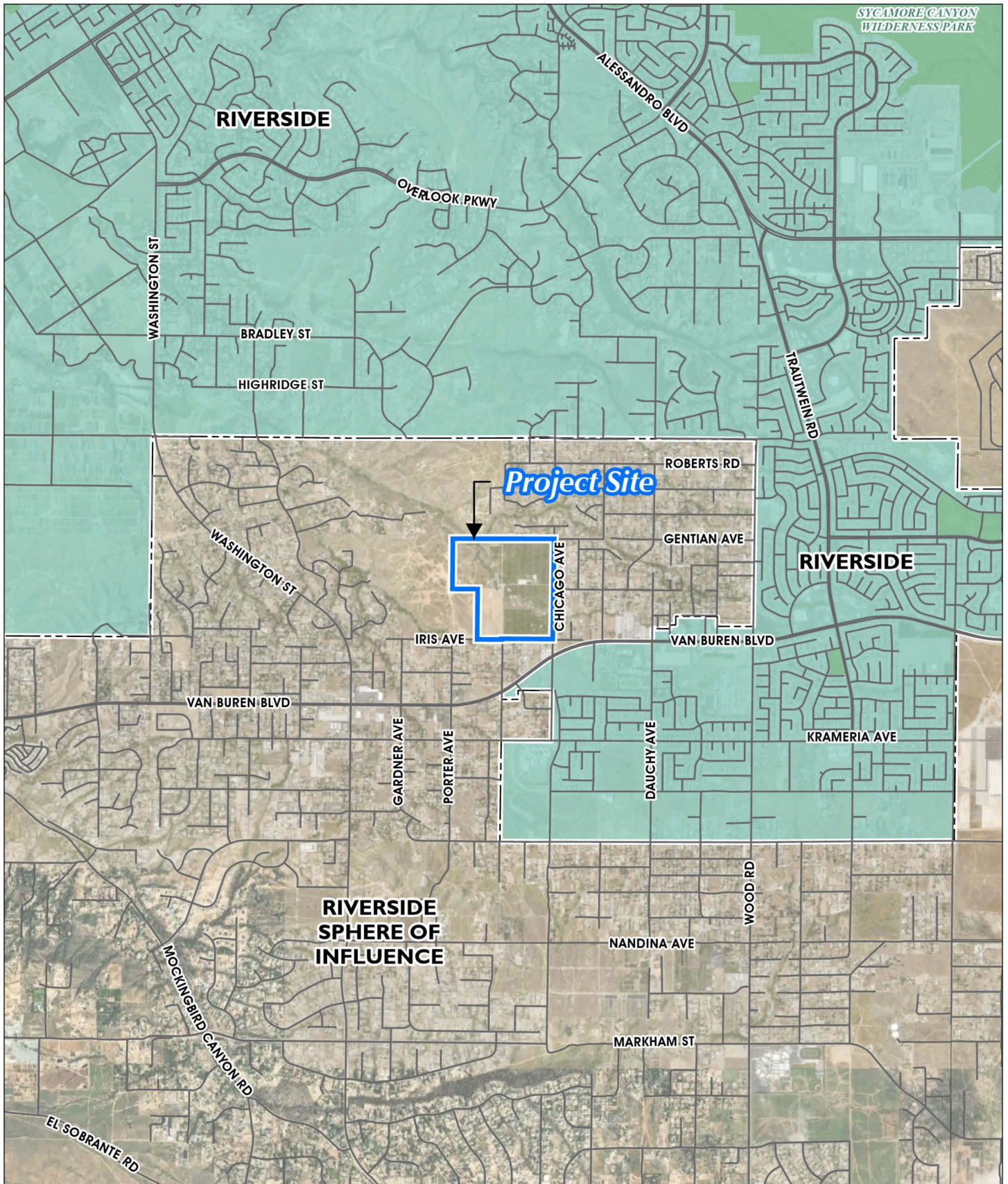
If applicable, describe any of the project's areas of controversy known to the Lead Agency, including issues raised by agencies and the public.

There are no known areas of controversy regarding the Project at this time.

Provide a list of the responsible or trustee agencies for the project.

Santa Ana Regional Water Quality Control Board
South Coast Air Quality Management District
Riverside County Flood Control and Water Conservation District
South Coast Air Quality Management District
Western Municipal Water District

Additional responsible agencies, if any, will be identified as part of the forthcoming EIR.

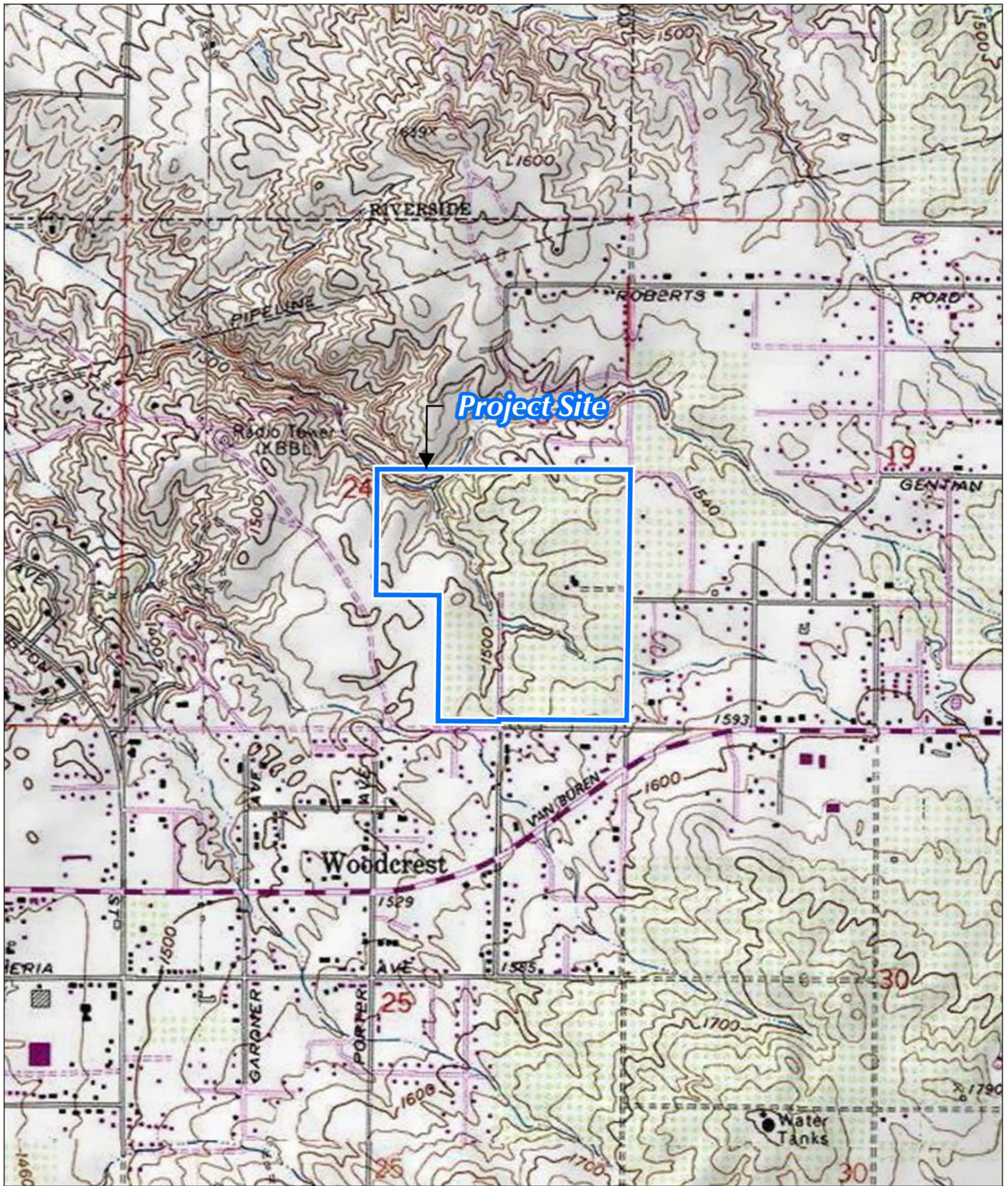


Source(s): Esri, Nearmap Imagery (2023), RCIT (2023)

Figure 1



Vicinity Map



Source(s): Esri, USGS (2013)

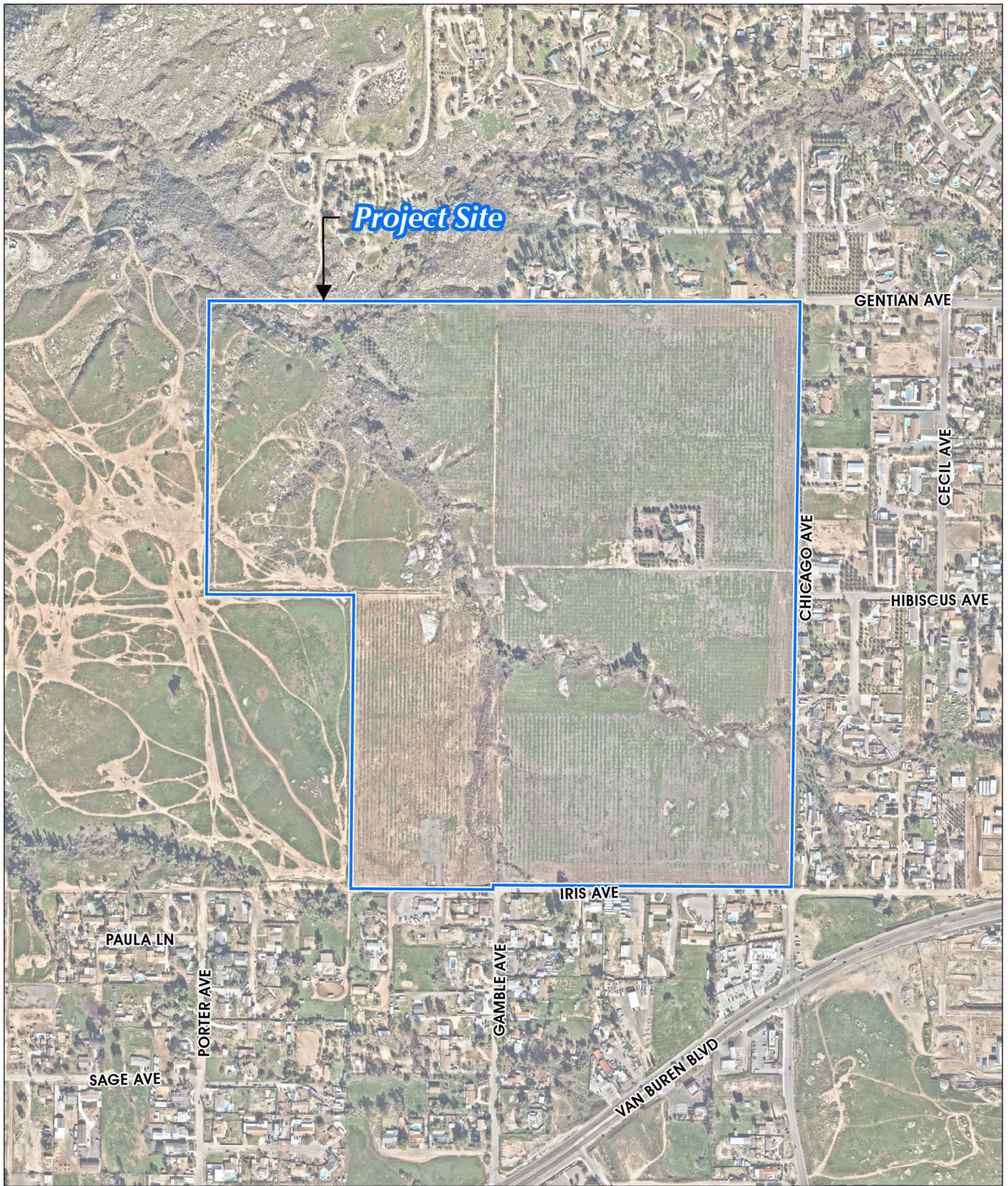
Figure 2



USGS Topographic Map

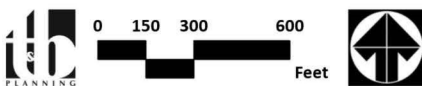
Arroyo Vista

JN: 1214-001
Date: 02-21-2023



Source(s): Esri, Nearmap Imagery (2023)

Figure 3





State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Inland Deserts Region
3602 Inland Empire Boulevard, Suite C-220
Ontario, CA 91764
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



April 3, 2023
Sent via email

Krista Mason
Riverside County
P.O. Box 1409
Riverside, CA 92501

Subject: Notice of Preparation of a Draft Environmental Impact Report
Arroyo Vista – General Plan Amendment No. 220009 (GPA220009),
Change of Zone No. 2200031 (CZ2200031), and Tentative Tract Map No.
38510 (TTM38510)
State Clearinghouse No. 2023030118

Dear Krista Mason:

The California Department of Fish and Wildlife (CDFW) received a Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) from the County of Riverside (County) for the Arroyo Vista General Plan Amendment No. 220009 (GPA220009), Change of Zone No. 2200031 (CZ2200031), and Tentative Tract Map No. 38510 (TTM38510) (Project) pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines.¹

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW ROLE

CDFW is California's Trustee Agency for fish and wildlife resources, and holds those resources in trust by statute for all the people of the State. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a).) CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (*Id.*, § 1802.) Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public

¹ CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW is also submitting comments as a Responsible Agency under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority. (Fish & G. Code, § 1600 et seq.) Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), the Project proponent may seek related take authorization as provided by the Fish and Game Code.

PROJECT LOCATION

The proposed Project is located in Riverside County, at the northwest corner of Iris Avenue and Chicago Avenue in the Lake Matthews/Woodcrest community of unincorporated Riverside County, Assessor's Parcel Numbers 245-300-001 and 245-300-004. Project latitude 33.88722, longitude -117.348717.

PROJECT DESCRIPTION SUMMARY

The Project would consist of a General Plan Amendment (GPA 220009), Change of Zone (CZ 2200031), and Tentative Tract Map (TTM38510) to allow for the development of 232 single-family dwelling units on a 140.8-acre property. GPA 220009 is a proposal to change the site's General Plan land use designation from "Rural Community – Very Low Density Residential (RC-VLDR)" to "Rural Community – Low Density Residential (RC-LDR)." CZ2200031 is a proposal to change the site's zoning classification from "Light Agriculture, 10-acre minimum lot size (A-1-10)" to "One Family Dwellings, 10,000 square foot minimum lot size (R-1-10,000)." TTM38510 is a proposal to subdivide the 140.8-acre property to develop 232 residential lots on approximately 87.7 acres, open space (including a trailhead) on approximately 25.0 acres, water quality basins on 4.9 acres, a sewer lift station on 0.25-acres, and street improvements and right-of-way dedications on 23.0 acres. The Project is not within a criteria cell, however it is within the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP), including survey area for Burrowing Owl.

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist the County in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. The comments and recommendations are also offered to enable the CDFW to adequately review and comment on the proposed Project with respect to the Project's consistency with the MSHCP.

CDFW recommends that the forthcoming DEIR address the following:

Assessment of Biological Resources

Section 15125(c) of the CEQA Guidelines states that knowledge of the regional setting of a project is critical to the assessment of environmental impacts and that special emphasis should be placed on environmental resources that are rare or unique to the region. To enable CDFW staff to adequately review and comment on the Project, the DEIR should include a complete assessment of the flora and fauna within and adjacent to the Project footprint, with particular emphasis on identifying rare, threatened, endangered, and other sensitive species and their associated habitats.

CDFW recommends that the DEIR specifically include:

1. An assessment of the various habitat types located within the Project footprint, and a map that identifies the location of each habitat type. CDFW recommends that floristic, alliance- and/or association-based mapping and assessment be completed following *The Manual of California Vegetation*, second edition (Sawyer et al. 2009²). Adjoining habitat areas should also be included in this assessment where site activities could lead to direct or indirect impacts offsite. Habitat mapping at the alliance level will help establish baseline vegetation conditions.
2. A general biological inventory of the fish, amphibian, reptile, bird, and mammal species that are present or have the potential to be present within each habitat type onsite and within adjacent areas that could be affected by the Project. CDFW's California Natural Diversity Database (CNDDDB) in Sacramento should be contacted at (916) 322-2493 or CNDDDB@wildlife.ca.gov or <https://wildlife.ca.gov/Data/CNDDDB/Maps-and-Data> to obtain current information on any previously reported sensitive species and habitat, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code, in the vicinity of the proposed Project.

CDFW's CNDDDB is not exhaustive in terms of the data it houses, nor is it an absence database. CDFW recommends that it be used as a starting point in gathering information about the *potential presence* of species within the general area of the Project site.

3. A complete, *recent* inventory of rare, threatened, endangered, and other sensitive species located within the Project footprint and within offsite areas with the potential to

² Sawyer, J. O., T. Keeler-Wolf, and J. M. Evens. 2009. A manual of California Vegetation, 2nd ed. California Native Plant Society Press, Sacramento, California. <http://vegetation.cnps.org/>

be affected, including California Species of Special Concern (CSSC) and California Fully Protected Species (Fish & G. Code, § 3511). Species to be addressed should include all those which meet the CEQA definition (CEQA Guidelines § 15380). The inventory should address seasonal variations in use of the Project area and should not be limited to resident species. Focused species-specific/MSHCP surveys, completed by a qualified biologist and conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required.

Acceptable species-specific survey procedures should be developed in consultation with CDFW and the U.S. Fish and Wildlife Service, where necessary. Note that CDFW generally considers biological field assessments for wildlife to be valid for a one-year period, and assessments for rare plants may be considered valid for a period of up to three years. Some aspects of the proposed Project may warrant periodic updated surveys for certain sensitive taxa, particularly if the Project is proposed to occur over a protracted time frame, or in phases, or if surveys are completed during periods of drought.

4. A thorough, recent, floristic-based assessment of special status plants and natural communities, following CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (CDFW 2018³).
5. Information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis on resources that are rare or unique to the region (CEQA Guidelines § 15125[c]).
6. A full accounting of all open space and mitigation/conservation lands within and adjacent to the Project.

Analysis of Direct, Indirect, and Cumulative Impacts to Biological Resources

The DEIR should provide a thorough discussion of the direct, indirect, and cumulative impacts expected to adversely affect biological resources as a result of the Project. To ensure that Project impacts to biological resources are fully analyzed, the following information should be included in the DEIR:

1. A discussion of potential impacts from lighting, noise, human activity (e.g., recreation), defensible space, and wildlife-human interactions created by zoning of development projects or other Project activities adjacent to natural areas, exotic and/or invasive species, and drainage. The latter subject should address Project-related changes on drainage patterns and water quality within, upstream, and downstream of the Project

³ CDFW, 2018. Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities, State of California, California Natural Resources Agency, Department of Fish and Wildlife: March 20, 2018 (<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&inline>)

site, including: volume, velocity, and frequency of existing and post-Project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-Project fate of runoff from the Project site.

2. A discussion of potential indirect Project impacts on biological resources, including resources in areas adjacent to the Project footprint, such as nearby public lands (e.g., National Forests, State Parks, etc.), open space, adjacent natural habitats, riparian ecosystems, wildlife corridors, and any designated and/or proposed reserve or mitigation lands (e.g., preserved lands associated with a Natural Community Conservation Plan, or other conserved lands).
3. An evaluation of impacts to on-site and adjacent open space lands from both the construction of the Project and any long-term operational and maintenance needs.
4. A cumulative effects analysis developed as described under CEQA Guidelines section 15130. The DEIR should analyze the cumulative effects of the plan's land use designations, policies, and programs on the environment. Please include all potential direct and indirect Project related impacts to riparian areas, wetlands, vernal pools, alluvial fan habitats, wildlife corridors or wildlife movement areas, aquatic habitats, sensitive species and other sensitive habitats, open lands, open space, and adjacent natural habitats in the cumulative effects analysis. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant communities and wildlife habitats.

Alternatives Analysis

CDFW recommends the DEIR describe and analyze a range of reasonable alternatives to the Project that are potentially feasible, would "feasibly attain most of the basic objectives of the Project," and would avoid or substantially lessen any of the Project's significant effects (CEQA Guidelines § 15126.6[a]). The alternatives analysis should also evaluate a "no project" alternative (CEQA Guidelines § 15126.6[e]).

Objectives

Section 15124(b) of the CEQA Guidelines requires that the project description contain a clear statement of the project objectives. CDFW recommends that the DEIR should include an objective to demonstrate consistency with the MSHCP, including the biological issues and considerations for Subunit 3 (Temescal Wash; page 3-456 of the MSHCP). These objectives include, but are not limited to, conservation of existing wetlands and upland habitat adjacent to Temescal Wash as well as maintaining a continuous linkage along Temescal Wash.

Mitigation Measures for Project Impacts to Biological Resources

The DEIR should identify mitigation measures and alternatives that are appropriate and adequate to avoid or minimize potential impacts, to the extent feasible. The County should assess all direct, indirect, and cumulative impacts that are expected to occur as a result of the implementation of the Project and its long-term operation and maintenance. When proposing measures to avoid, minimize, or mitigate impacts, CDFW recommends consideration of the following:

1. *Fully Protected Species*: Fully protected species may not be taken or possessed at any time. Project activities described in the DEIR should be designed to completely avoid any fully protected species that have the potential to be present within or adjacent to the Project area. CDFW also recommends that the DEIR fully analyze potential adverse impacts to fully protected species due to habitat modification, loss of foraging habitat, and/or interruption of migratory and breeding behaviors. CDFW recommends that the Lead Agency include in the analysis how appropriate avoidance, minimization, and mitigation measures will reduce indirect impacts to fully protected species.
2. *Sensitive Plant Communities*: CDFW considers sensitive plant communities to be imperiled habitats having both local and regional significance. Plant communities, alliances, and associations with a statewide ranking of S-1, S-2, S-3, and S-4 should be considered sensitive and declining at the local and regional level. These ranks can be obtained by querying the CNDDB and are included in *The Manual of California Vegetation* (Sawyer et al. 2009). The DEIR should include measures to fully avoid and otherwise protect sensitive plant communities from Project-related direct and indirect impacts.
3. *California Species of Special Concern (CSSC)*: CSSC status applies to animals generally not listed under the federal Endangered Species Act or the CESA, but which nonetheless are declining at a rate that could result in listing, or historically occurred in low numbers and known threats to their persistence currently exist. CSSCs should be considered during the environmental review process. CSSC that have the potential or have been documented to occur within or adjacent to the Project area, including, but not limited to: burrowing owl, coast horned lizard, coastal California gnatcatcher, California glossy snake, red-diamond rattlesnake, western mastiff bat, and western spadefoot toad.
4. *Mitigation*: CDFW considers adverse Project-related impacts to sensitive species and habitats to be significant to both local and regional ecosystems, and the DEIR should include mitigation measures for adverse Project-related impacts to these resources. Mitigation measures should emphasize avoidance and reduction of Project impacts. For unavoidable impacts, onsite habitat restoration and/or enhancement, and preservation should be evaluated and discussed in detail. Where habitat preservation

is not available onsite, offsite land acquisition, management, and preservation should be evaluated and discussed in detail.

The DEIR should include measures to perpetually protect the targeted habitat values within mitigation areas from direct and indirect adverse impacts in order to meet mitigation objectives to offset Project-induced qualitative and quantitative losses of biological values. Specific issues that should be addressed include restrictions on access, proposed land dedications, long-term monitoring and management programs, control of illegal dumping, water pollution, increased human intrusion, etc.

If sensitive species and/or their habitat may be impacted from the Project, CDFW recommends the inclusion of specific mitigation in the DEIR. CEQA Guidelines section 15126.4, subdivision (a)(1)(8) states that formulation of feasible mitigation measures should not be deferred until some future date. The Court of Appeal in *San Joaquin Raptor Rescue Center v. County of Merced* (2007) 149 Cal.App.4th 645 struck down mitigation measures which required formulating management plans developed in consultation with State and Federal wildlife agencies after Project approval. Courts have also repeatedly not supported conclusions that impacts are mitigable when essential studies, and therefore impact assessments, are incomplete (*Sundstrom v. County of Mendocino* (1988) 202 Cal. App. 3d. 296; *Gentry v. County of Murrieta* (1995) 36 Cal. App. 4th 1359; *Endangered Habitat League, Inc. v. County of Orange* (2005) 131 Cal. App. 4th 777).

CDFW recommends that the DEIR specify mitigation that is roughly proportional to the level of impacts, in accordance with the provisions of CEQA (CEQA Guidelines, §§ 15126.4(a)(4)(B), 15064, 15065, and 16355). The mitigation should provide long-term conservation value for the suite of species and habitat being impacted by the Project. Furthermore, in order for mitigation measures to be effective, they need to be specific, enforceable, and feasible actions that will improve environmental conditions.

5. *Habitat Revegetation/Restoration Plans*: Plans for restoration and revegetation should be prepared by persons with expertise in southern California ecosystems and native plant restoration techniques. Plans should identify the assumptions used to develop the proposed restoration strategy. Each plan should include, at a minimum: (a) the location of restoration sites and assessment of appropriate reference sites; (b) the plant species to be used, sources of local propagules, container sizes, and seeding rates; (c) a schematic depicting the mitigation area; (d) a local seed and cuttings and planting schedule; (e) a description of the irrigation methodology; (f) measures to control exotic vegetation on site; (g) specific success criteria; (h) a detailed monitoring program; (i) contingency measures should the success criteria not be met; and (j) identification of the party responsible for meeting the success criteria and providing for conservation of the mitigation site in perpetuity. Monitoring of restoration areas should extend across a sufficient time frame to ensure that the new habitat is established, self-sustaining, and capable of surviving drought.

CDFW recommends that local onsite propagules from the Project area and nearby vicinity be collected and used for restoration purposes. Onsite seed collection should be initiated in advance of Project impacts in order to accumulate sufficient propagule material for subsequent use in future years. Onsite vegetation mapping at the alliance and/or association level should be used to develop appropriate restoration goals and local plant palettes. Reference areas should be identified to help guide restoration efforts. Specific restoration plans should be developed for various Project components as appropriate.

Restoration objectives should include protecting special habitat elements or re-creating them in areas affected by the Project; examples could include retention of woody material, logs, snags, rocks, and brush piles.

6. *Nesting Birds and Migratory Bird Treaty Act*: Please note that it is the Project proponent's responsibility to comply with all applicable laws related to nesting birds and birds of prey. Fish and Game Code sections 3503, 3503.5, and 3513 afford protective measures as follows: Fish and Game Code section 3503 makes it unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by Fish and Game Code or any regulation made pursuant thereto. Fish and Game Code section 3503.5 makes it unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds-of-prey) to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by Fish and Game Code or any regulation adopted pursuant thereto. Fish and Game Code section 3513 makes it unlawful to take or possess any migratory nongame bird as designated in the Migratory Bird Treaty Act or any part of such migratory nongame bird except as provided by rules and regulations adopted by the Secretary of the Interior under provisions of the Migratory Treaty Act.

CDFW recommends that the DEIR include the results of avian surveys, as well as specific avoidance and minimization measures to ensure that impacts to nesting birds do not occur. Project-specific avoidance and minimization measures may include, but not be limited to: Project phasing and timing, monitoring of Project-related noise (where applicable), sound walls, and buffers, where appropriate. The DEIR should also include specific avoidance and minimization measures that will be implemented should a nest be located within the Project site. If pre-construction surveys are proposed in the DEIR, the CDFW recommends that they be required no more than three (3) days prior to vegetation clearing or ground disturbance activities, as instances of nesting could be missed if surveys are conducted sooner.

7. *Moving out of Harm's Way*: To avoid direct mortality, CDFW recommends that the lead agency condition the DEIR to require that a CDFW-approved qualified biologist be retained to be onsite prior to and during all ground- and habitat-disturbing activities to move out of harm's way special status species or other wildlife of low or limited mobility that would otherwise be injured or killed from Project-related activities. Movement of wildlife out of harm's way should be limited to only those individuals that

would otherwise be injured or killed, and individuals should be moved only as far as necessary to ensure their safety (i.e., CDFW does not recommend relocation to other areas). Furthermore, it should be noted that the temporary relocation of onsite wildlife does not constitute effective mitigation for the purposes of offsetting Project impacts associated with habitat loss.

8. *Translocation of Species*: CDFW generally does not support the use of relocation, salvage, and/or transplantation as mitigation for impacts to rare, threatened, or endangered species as studies have shown that these efforts are experimental in nature and largely unsuccessful.

California Endangered Species Act

CDFW is responsible for ensuring appropriate conservation of fish and wildlife resources including threatened, endangered, and/or candidate plant and animal species, pursuant to CESA. CDFW recommends that a CESA Incidental Take Permit (ITP) be obtained if the Project has the potential to result in “take” (California Fish and Game Code Section 86 defines “take” as “hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill”) of State-listed CESA species, either through construction or over the life of the Project. It is the policy of CESA to conserve, protect, enhance, and restore State-listed CESA species and their habitats.

CDFW encourages early consultation, as significant modification to the proposed Project and avoidance, minimization, and mitigation measures may be necessary to obtain a CESA ITP. The California Fish and Game Code requires that CDFW comply with CEQA for issuance of a CESA ITP. CDFW therefore recommends that the DEIR addresses all Project impacts to listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of CESA.

Western Riverside County Multiple Species Habitat Conservation Plan

CDFW issued Natural Community Conservation Plan Approval and Take Authorization for the Western Riverside County MSHCP per Section 2800, *et seq.*, of the California Fish and Game Code on June 22, 2004. The MSHCP establishes a multiple species conservation program to minimize and mitigate habitat loss and provides for the incidental take of covered species in association with activities covered under the permit.

Compliance with approved habitat plans, such as the MSHCP, is discussed in CEQA. Specifically, Section 15125(d) of the CEQA Guidelines requires that the CEQA document discuss any inconsistencies between a proposed Project and applicable general plans and regional plans, including habitat conservation plans and natural community conservation plans. An assessment of the impacts to the MSHCP as a result of this Project is necessary to address CEQA requirements. To obtain additional information regarding the MSHCP please go to: <https://www.wrc-rca.org/>.

The proposed Project occurs within the MSHCP area and is subject to the provisions and policies of the MSHCP. To be considered a covered activity, Permittees need to demonstrate that proposed actions are consistent with the MSHCP, the Permits, and the Implementing Agreement. The County of Riverside is the Lead Agency and is signatory to the Implementing Agreement of the MSHCP. To demonstrate consistency with the MSHCP, as part of the CEQA review, the County shall ensure the Project implements the following:

1. Pays Local Development Mitigation Fees and other relevant fees as set forth in Section 8.5 of the MSHCP.
2. Demonstrates compliance with the HANS process (MSHCP Section 6.1.1) or equivalent process to ensure application of the Criteria and thus, satisfaction of the local acquisition obligation.
3. Demonstrates compliance with the policies for 1) the Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools, set forth in Section 6.1.2 of the MSHCP; 2) the policies for the Protection of Narrow Endemic Plant Species set forth in Section 6.1.3 of the MSHCP; 3) compliance with the Urban/Wildlands Interface Guidelines as set forth in Section 6.1.4 of the MSHCP; 4) the policies set forth in Section 6.3.2 and associated vegetation survey requirements identified in Section 6.3.1; and 5) compliance with the Best Management Practices and the siting, construction, design, operation and maintenance guidelines as set forth in Section 7.0 and Appendix C of the MSHCP.

Following this sequential identification of the relationship of the Project to the MSHCP the DEIR should then include an in-depth discussion of the Project in the context of these aforementioned elements, and as mentioned, examine how the Project might contribute to, or conflict with, the conservation criteria of the MSHCP.

Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools.

The procedures described in Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools section (MSHCP Section 6.1.2) are to ensure that the biological functions and values of these areas are maintained throughout the MSHCP area. Additionally, this process helps identify areas to consider for priority acquisition, as well as those functions that may affect downstream values related to Conservation of Covered Species within the MSHCP Conservation Area. The assessment of riparian/riverine and vernal pool resources may be completed as part of the CEQA review process as set forth in Article V of the State CEQA Guidelines. However, the MSHCP identifies that the U.S. Fish and Wildlife Service and CDFW shall be notified in advance of approval of public or private projects of draft determinations for the biologically equivalent or superior determination findings associated with the Protection of Wetland Habitats and Species policies presented in Section 6.1.2 of the MSHCP (MSHCP Section 6.11). As required by MSHCP, completion of the DBESP process prior to adoption of the

environmental document ensures that the project is consistent with the MSHCP and provides public disclosure and transparency during the CEQA process by identifying the project impacts and mitigation for wetland habitat, a requirement of CEQA Guidelines, §§ 15071, subds.(a)-(e).

The MSHCP identifies that assessment of these areas include identification and mapping of riparian/riverine areas and vernal pools. The assessment shall consider species composition, topography/ hydrology, and soil analysis, where appropriate. The documentation for the assessment shall include mapping and a description of the functions and values of the mapped areas with respect to the species identified in Section 6.1.2 of the MSHCP. Factors to be considered include hydrologic regime, flood storage and flood-flow modification, nutrient retention and transformation, sediment trapping and transport, toxicant trapping, public use, wildlife Habitat, and aquatic Habitat.

The MSHCP identifies that for mapped riparian/riverine and vernal pool resources that are not included in the MSHCP conservation area, applicable mitigation under CEQA, shall be imposed by the Permittee (in this case the County). Further, the MSHCP identifies that to ensure the standards in Section 6.1.2 are met, the Permittee shall ensure that, through the CEQA process, project applicants develop project alternatives demonstrating efforts that first avoid, and then minimize direct and indirect effects to the wetlands mapped pursuant to Section 6.1.2. If an avoidance alternative is not feasible, a practicable alternative that minimizes direct and indirect effects to riparian/riverine areas and vernal pools and associated functions and values to the greatest extent possible shall be selected. Those impacts that are unavoidable shall be mitigated such that the lost functions and values as they relate to Covered Species are replaced as through the Determination of Biologically Equivalent or Superior Preservation (DBESP). The County is required to ensure the Applicant completes the DBESP process prior to completion of the DEIR to demonstrate implementation of MSHCP requirements in the CEQA documentation.

The MSHCP's policy for the Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools (MSHCP Section 6.1.2) identifies that if riparian/riverine habitat is avoided then measures should be incorporated into the Project design to ensure the long-term conservation of the areas to be avoided, and associated functions and values, through the use of deed restrictions, conservation easement, or other appropriate mechanisms. CDFW requests that to demonstrate consistency with the MSHCP, the County should condition the Project Applicant to record a deed restrictions, conservation easement, or other appropriate mechanisms over avoided riparian/riverine resources.

The MSHCP identifies that treatment of edge effects should be addressed as part of the avoidance and minimization process to ensure avoided riparian/riverine areas maintain long-term conservation values (MSHCP Section 6.1.2, page 6-24).

In addition, CDFW recommends that the DEIR includes descriptions and designs for crossings sized to span the 100-year floodplain for any streams or wetlands that are found and may be impacted during Project activities.

Burrowing Owl (*Athene cunicularia*)

The Project site has the potential to provide suitable foraging and/or nesting habitat for burrowing owl. Take of individual burrowing owls and their nests is defined by Fish and Game Code section 86, and prohibited by sections 3503, 3503.5 and 3513. Take is defined in Fish and Game Code section 86 as “hunt, pursue, catch, capture or kill, or attempt to hunt, pursue, catch, capture or kill.”

CDFW recommends that the County follow the survey instructions in the “Burrowing Owl Survey Instructions for the Western Riverside Multiple Species Habitat Conservation Plan Area”⁴. The Survey Instructions specify that first a habitat assessment is conducted. If suitable habitat is not found on site, simply reporting the site is disturbed or under agricultural/dairy use is not acceptable. A written report must be provided detailing results of the habitat assessment with photographs and indicating whether or not the project site contains suitable burrowing owl habitat. If suitable habitat is found, then focused surveys at the appropriate time of year (March 1 to August 31), time of day, and weather conditions must be completed. Surveys will not be accepted if they are conducted during rain, high winds (> 20 mph), dense fog, or temperatures over 90 °F. The surveys must include focused burrow surveys and burrowing owl surveys. For the focused burrow surveys, the location of all suitable burrowing owl habitat, potential owl burrows, burrowing owl sign, and any owls observed should be recorded and mapped, including GPS coordinates in the report. The focused burrowing owl surveys include site visits on four separate days. CDFW recommends that the site visits are conducted at least a week apart to avoid missing owls that may be using the site. Finally, CDFW recommends the report also include an impact assessment evaluating the extent to which burrowing owls and their habitat may be impacted, directly or indirectly by Project activities. A final report discussing the survey methodology, transect width, duration, conditions, and results of the Survey shall be submitted to the RCA and the County.

Habitat assessments are conducted to evaluate the likelihood that a site supports burrowing owl. Burrowing owl surveys provide information needed to determine the potential effects of proposed projects and activities on burrowing owls, and to avoid take in accordance with Fish and Game Code sections 86, 3503, and 3503.5. Impact assessments evaluate the extent to which burrowing owls and their habitat may be impacted, directly or indirectly, on and within a reasonable distance of a proposed CEQA project activity or non-CEQA project.

4 https://www.wrc-rca.org/species/survey_protocols/burrowing_owl_survey_instructions.pdf

Additionally, CDFW recommends that the County review and follow requirements for burrowing owl outlined in the MSHCP, specifically Section 6.3.2 (Additional Survey Needs and Procedures) and Appendix E (Summary of Species Survey Requirements). Appendix E of the MSHCP outlines survey requirements, actions to be taken if survey results are positive, and species-specific conservation objectives, among other relevant information.

Lake and Streambed Alteration Program

Based on review of material submitted with the NOP, drainage features may traverse some of the parcels within the Project's scope. Depending on how the Project is designed and constructed, it is likely that the Project applicant will need to notify CDFW per Fish and Game Code section 1602. Fish and Game Code section 1602 requires an entity to notify CDFW prior to commencing any activity that may do one or more of the following: substantially divert or obstruct the natural flow of any river, stream, or lake; substantially change or use any material from the bed, channel or bank of any river, stream, or lake; or deposit debris, waste or other materials that could pass into any river, stream, or lake. Please note that "any river, stream or lake" includes those that are episodic (i.e., those that are dry for periods of time) as well as those that are perennial (i.e., those that flow year-round). This includes ephemeral streams, desert washes, and watercourses with a subsurface flow.

Upon receipt of a complete notification, CDFW determines if the proposed Project activities may substantially adversely affect existing fish and wildlife resources and whether a Lake and Streambed Alteration (LSA) Agreement is required. An LSA Agreement includes measures necessary to protect existing fish and wildlife resources. CDFW may suggest ways to modify your Project that would eliminate or reduce harmful impacts to fish and wildlife resources.

CDFW's issuance of an LSA Agreement is a "project" subject to CEQA (see Pub. Resources Code § 21065). To facilitate issuance of an LSA Agreement, if necessary, the DEIR should fully identify the potential impacts to the lake, stream, or riparian resources, and provide adequate avoidance, mitigation, and monitoring and reporting commitments. Early consultation with CDFW is recommended, since modification of the proposed Project may be required to avoid or reduce impacts to fish and wildlife resources. To submit a Lake or Streambed Alteration notification, please go to <https://wildlife.ca.gov/Conservation/Environmental-Review/EPIMS>.

ADDITIONAL COMMENTS AND RECOMMENDATIONS

Native Landscaping

To ameliorate the water demands of this Project, CDFW recommends incorporation of water-wise concepts in Project landscape design plans. In particular, CDFW recommends xeriscaping with locally native California species, and installing water-efficient and

targeted irrigation systems (such as drip irrigation). Native plants support butterflies, birds, reptiles, amphibians, small mammals, bees, and other pollinators that evolved with those plants, more information on native plants suitable for the Project location and nearby nurseries is available at CALSCAPE: <https://calscape.org/>. Local water agencies/districts and resource conservation districts in your area may be able to provide information on plant nurseries that carry locally native species, and some facilities display drought-tolerant locally native species demonstration gardens (for example the Riverside-Corona Resource Conservation District in Riverside). Information on drought-tolerant landscaping and water-efficient irrigation systems is available on California's Save our Water website: <https://saveourwater.com/>.

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). Information can be submitted online or via completion of the CNDDDB field survey form at the following link: <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The types of information reported to CNDDDB can be found at the following link: <https://www.wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals>.

ENVIRONMENTAL DOCUMENT FILING FEES


The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying Project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.).

CONCLUSION

CDFW appreciates the opportunity to comment on the NOP of a DEIR for the Arroyo Vista General Plan Amendment No. 220009 (GPA220009), Change of Zone No. 2200031 (CZ2200031), and Tentative Tract Map No. 38510 (TTM38510) Project (SCH No. 2023030118) and recommends that the County of Riverside address the CDFW's comments and concerns in the forthcoming DEIR. Questions regarding this letter or further coordination should be directed to John Dempsey, Environmental Scientist, at John.Dempsey@wildlife.ca.gov.

Krista Mason, Urban Regional Planner IV
County of Riverside
April 3, 2023
Page 15 of 15

Sincerely,

DocuSigned by:

84F92FFEEFD24C8...

Kim Freeburn
Environmental Program Manager

ec:

Heather Pert, Senior Environmental Scientist Supervisor
Inland Deserts Region
Heather.Pert@wildlife.ca.gov

Office of Planning and Research, State Clearinghouse, Sacramento
state.clearinghouse@opr.ca.gov

Tricia Campbell (Western Riverside County Regional Conservation Authority)
Director of Reserve Management and Monitoring
tcampbell@rctc.org

March 30, 2023

To: Riverside County Planning Department

Attn: Krista Mason, Urban and Regional Planner IV

From: Kathleen Crook

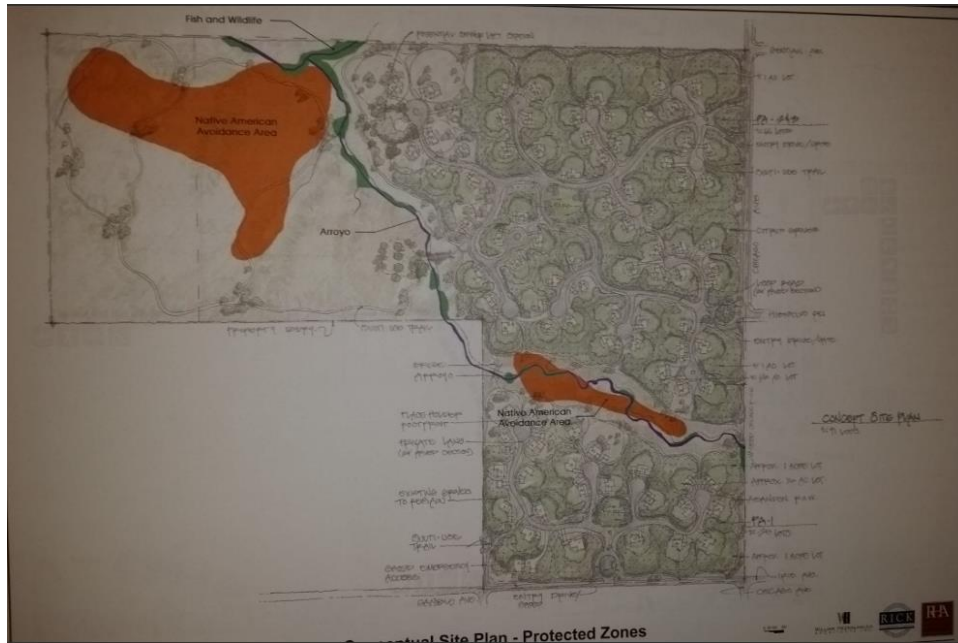
Re: Arroyo Vista Project Environment Impact Report Comments and comments related to TTM38510, GPA220009 and CZ2200031

Dear Ms. Mason,

I have several concerns regarding the Arroyo Vista Project Proposed Development which are summarized below along with detailed comments in the following pages:

1. **Water run-off from developing the project property.**
2. **Preserving the unique features of the Woodcrest area as a community** “overwhelmingly rural in character, with a strong equestrian presence”. As stated in the Riverside County General Plan for the Woodcrest area, the “intent is to enhance and/or preserve the identity, character and features of this unique area”. This can only be achieved by matching the Foundation Component/Land Use Designation at a minimum of Low Density Residential (RC-LDR) 0.5 acre minimum. The proposed rezoning of the entire project property to One Family Dwellings, 10,000 square-foot (s.f.) minimum lot size (R-1-10,000) does not support this.
3. **Native American significance on the property.** A previous study was conducted back in 2016 and it already identified areas of Native American significance and significant rock outcroppings that were to be avoided. These areas are identified in orange on the pictures following:





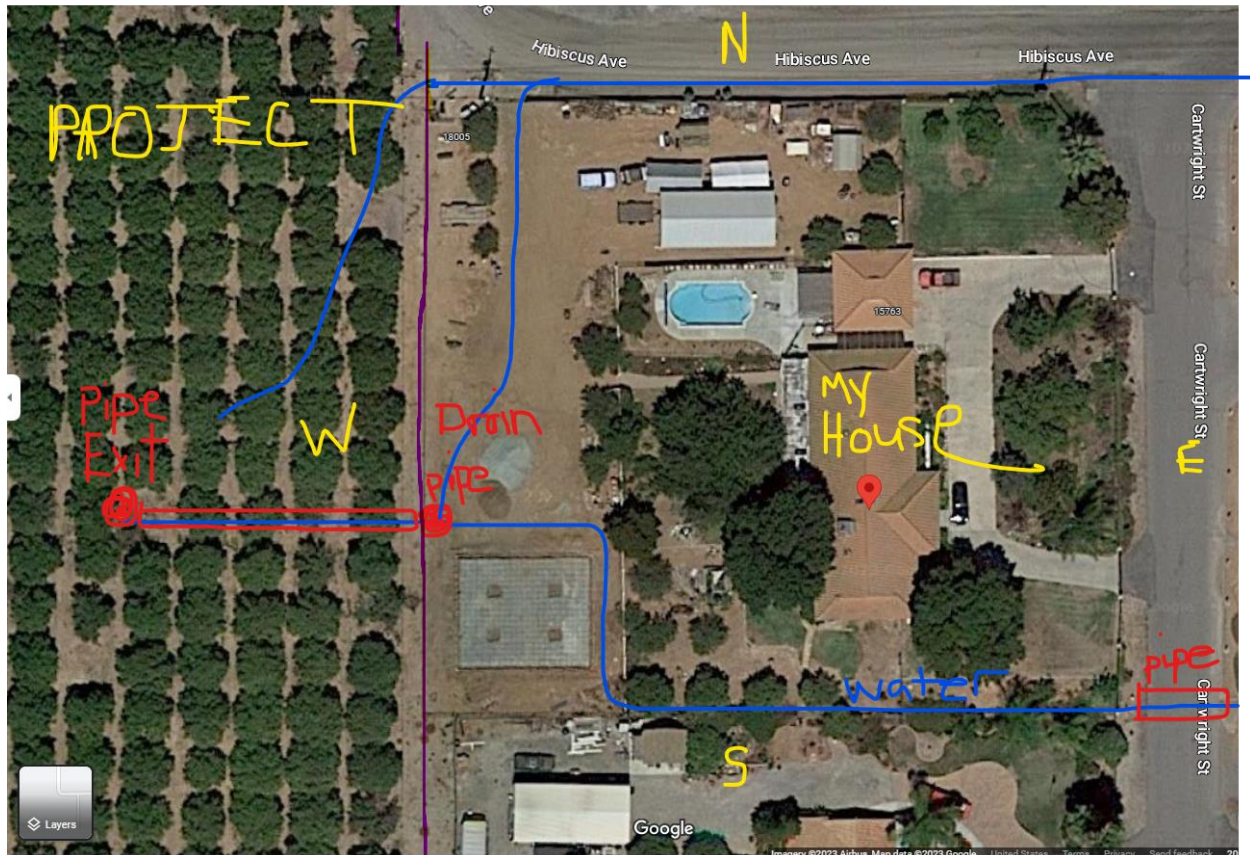
Additionally, when the majority of the Orange trees from the project property were removed in 2020, it revealed that there are many more significant rock outcroppings that were not identified back in 2016. There may be more Native American significance visible as well. The new study should identify all these protected areas and be included in the as areas to avoid.

4. **Identification of all rock outcroppings which should be avoided.** Again, when the majority of the Orange trees from the project property were removed in 2020, it revealed that there are many more significant rock outcroppings that were not identified back in 2016. The new study should identify all these rock outcroppings and included in the as areas to avoid.
5. **Conducting a comprehensive species study, cultural analysis by an archeologist and biologist study related to the environmental impact of this project.**
6. **Street Lighting within the development.**

Item #1: Water run-off from developing the project property.

My Family lives at 15765 Cartwright Drive, Riverside. The back of my house (West border) shares a property line with the proposed Arroyo Vista Project. One of my biggest Environmental Impact concerns involves where all the water run-off from Hibiscus Avenue and Cartwright Drive will end up once houses are developed on this property.

Back in 1977, when the houses on Cartwright Drive were built, the County of Riverside must have had different standards to control water drainage. They allowed all the water from Cartwright Drive to travel to a culvert in front of my house that then drains along the South border of my property (in between my house and my neighbor's property). I have included a diagram below for your reference. The water ends up draining to the back of my property to an 8" clay pipe that goes underground and into the project property where it can freely drain into the ground and be reclaimed into the water table.



Drainage Culvert under Cartwright Drive and in front of my house



Hibiscus Avenue Drainage and Sandbags to prevent my backyard from flooding.



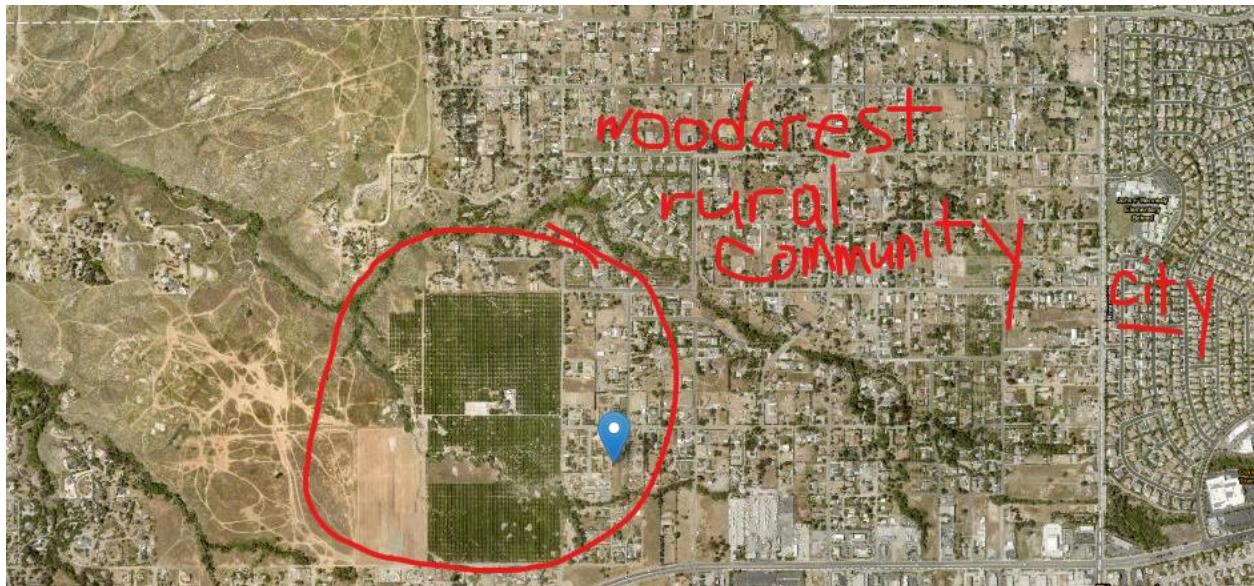
The Environmental Impact Report will need to address how the Arroyo Vista Project will control the water run-off that comes from my existing neighborhood via Hibiscus Avenue and Cartwright Drive. How will they or the County control the water that now ends up in my backyard and drains into a pipe into the project property? Once they develop houses on that land and remove or block the current path the water takes through the drain pipe in my backyard or directly into the property off of Hibiscus Avenue, where is the water going to end up and what are they going to do to ensure my house and property does not flood every time it rains? There are no curbs or gutters in my neighborhood to control the water run-off.

Additionally, there is an existing natural drainage V in the North West corner of the project property. The homeowners on the North of the development will be impacted by the development and once it rains, the natural drainage will erode due to the increased water run-off and other areas will be polluted by sewage and water that has nowhere to drain due to the loss of open land where houses and streets are built. The study should address how the water will be controlled in this area.

Item #2: Preserving the unique features of the Woodcrest area as a community

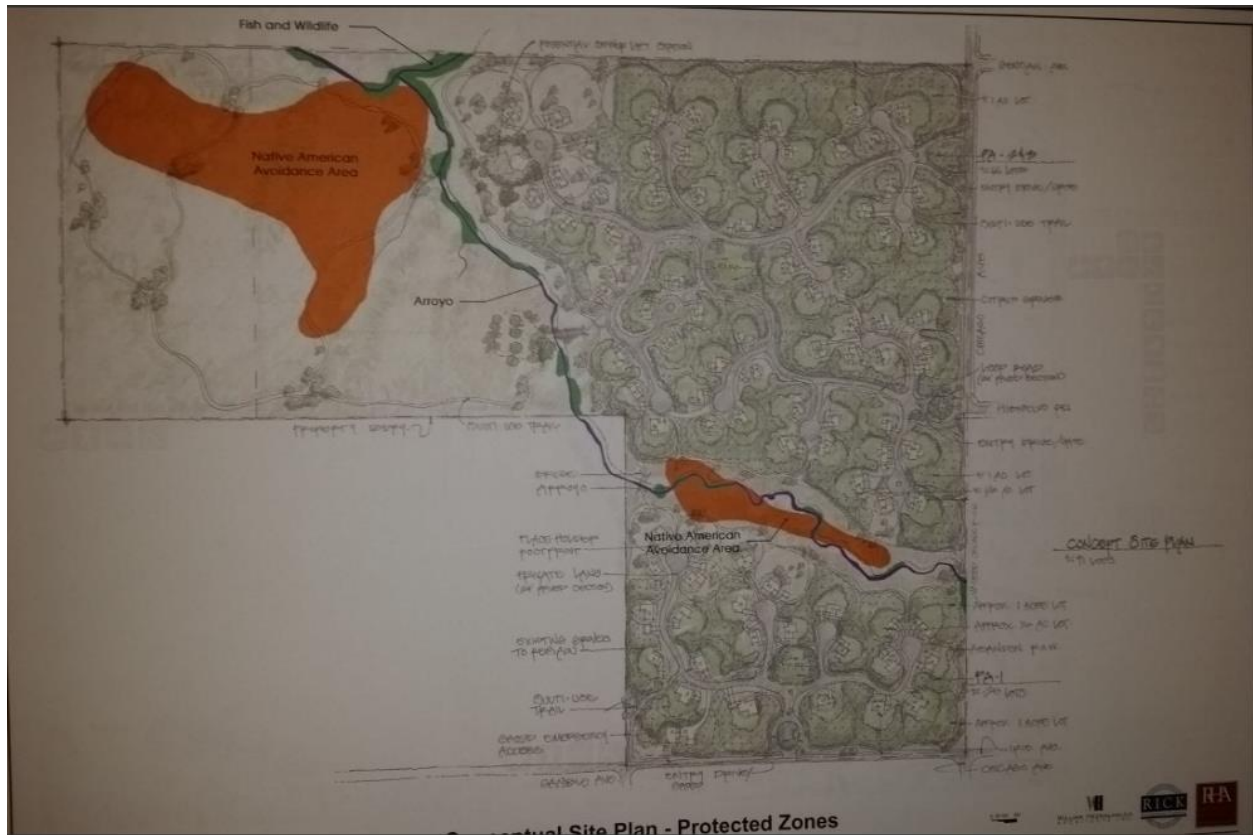
Another opposition I have is the proposed rezoning of the entire project property to One Family Dwellings, 10,000 square-foot (s.f.) minimum lot size (R-1-10,000). If this rezoning were approved, even though the Developer of this Project and TTM328510 proposes to only build 232 houses, I calculated they could revise their TTM and build up to 382 houses on the 87.7 acres currently designated for housing. This number could increase to 613 houses on the 140.7 acres if they use the “clustering method” and later modify their TTM. This would destroy our rural community consisting of houses on a minimum of 1 acre.

I participated in all the meetings this new developer The True Life Companies had with the Community and we discussed our concerns and the impact the development will have on our properties, way of life and the community we live in. The developer listened to the community and drafted TTM38510 as a result of these meetings. However, rezoning the entire project to be R-1-10,000 is not something that was discussed and I do not support it. It scares me because there is no guarantee they will only build 232 houses. Designation should comply with the general plan and be a minimum of Low Density Residential (RC-LDR) 0.5 acre minimum. This rezoning request for R-1-10,000 should be contingent on the current TTM and revoked if any modifications are made to add more than 232 houses.



Item #3: Native American significance on the property

A previous developer had already identified some Native American areas that must be avoided. At the time that report was drafted the Orange Trees were still on the project property but have since been removed. This has exposed additional rock outcroppings that need to be investigated to confirm if any additional Native American significance or artifacts exist.



Item #4: Identification of all rock outcroppings which should be avoided.

I have included a satellite view map and circled in red the areas and rock outcroppings that are now visible since the Orange Grove was removed which I feel should be investigated.

This report should carefully research all rock outcroppings and determine their Native American significance and identify any artifacts that must be preserved.



0...

Item #5: Conducting a comprehensive species study, cultural analysis by an archeologist and biologist study related to the environmental impact of this project.

The current project property still houses a multitude of animals which I have personally observed because they often end up on my property or are viewable from my property. The current owner of the project property chopped down the beautiful orange grove in August 2020 and I believe killed a lot of the animals in the process. However, some survived and are now thriving in their new habitat.

I have witnessed the following animals on this property: “

1. Various amphibians in the project property such as frogs and salamanders.
2. Various reptiles including the California King Snake, garter snake, gopher snake and lots of different lizards. Some have bright blue colors and others copper colors with long sleek bodies.
3. Various birds including Hawks, Falcons, Woodpeckers, Vultures, Doves, Bluebirds, Robins, Roadrunners and Owls. They visit the trees in my front and back yard and use the project property and Arroyo for hunting.
4. Various rodents including ground squirrels, moles, gophers, Norway rats, mice and even a kangaroo rat which I found and released after taking a picture of it (below).
5. Large mammals such as the Coyotes use the Arroyo regularly to travel and hunt on the property and I usually hear them yelping to each other about 10 times per month.
6. I have seen opossums and raccoons on the project property.
7. I also observed water life in the year-round pools that exist in the natural waterway that runs through the property. I have seen crayfish/crawdads and small fish in those pools.

I request the report carefully research the wildlife that exists on the project property to identify any that are protected and address the impact the building of houses and paving of land will have on the wildlife population. The natural Arroyo that runs through the property is beautiful and should be protected and preserved.



Owl's visiting my trees at night.



Kangaroo rat and birds visiting my property.

5. Street Lighting within the development

There are very few street lights existing in the surrounding area. The homeowners appreciate seeing the stars and City Lights at the bottom of the hill at night and want to make sure the street lighting located within and leading to the development will not illuminate their properties, shine into their bedroom windows and prevent viewing the beautiful night skies. There is an existing housing tract located within the Woodcrest area (bordered by Chicago, Gentian, Ridgeway and Kross) that serves as a perfect example for the proper amount of street lighting for safety without overpowering the night skies. The picture below demonstrates how rural Woodcrest is compared to a City development it is adjacent to.



I hope these comments will all be addressed in the Environmental Impact Report or in the scoping meeting and the rural, equestrian community of Woodcrest will not be destroyed by this development.

If you have any questions, please contact me at 714-423-4868.

Kathleen Crook



MARCH 13, 2023

VIA EMAIL: KMASON@RIVCO.ORG

Riverside County Planning Department
Attn: Krista Mason, Urban Regional Planner IV
P.O. Box 1409
Riverside, CA 92502-1409

Dear Ms. Mason:

NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT FOR THE ARROYO VISTA PROJECT, SCH# 2023030118

The Department of Conservation's (DOC) Division of Land Resource Protection (Division) has reviewed the Notice of Preparation of an Environmental Impact Report for the Arroyo Vista Project (Project). The Division monitors farmland conversion on a statewide basis, provides technical assistance regarding the Williamson Act, and administers various agricultural land conservation programs. We offer the following comments and recommendations with respect to the project's potential impacts on agricultural land and resources.

Project Description

The proposed Project consists of applications for a General Plan Amendment (GPA220009), Change of Zone (CZ2200031), and Tentative Tract Map (TTM38510) to allow for the development of 232 single-family dwelling units on a 140.8-acre property located at the northwest corner of Iris Avenue and Chicago Avenue in the Lake Matthews/Woodcrest community of unincorporated Riverside County.

Comments

The conversion of agricultural land represents a permanent reduction and significant impact to California's agricultural land resources. CEQA requires that all feasible and reasonable mitigation be reviewed and applied to projects. Under CEQA, a lead agency should not approve a project if there are feasible alternatives or feasible mitigation measures available that would lessen the significant effects of the project.

All mitigation measures that are potentially feasible should be included in the project's environmental review. A measure brought to the attention of the lead agency should not be left out unless it is infeasible based on its elements.

Consistent with CEQA Guidelines, DOC recommends the consideration of agricultural conservation easements, among other measures, as potential mitigation. (See Cal. Code Regs., tit. 14, § 15370 [mitigation includes “compensating for the impact by replacing or providing substitute resources or environments, including through permanent protection of such resources in the form of conservation easements.”])

Mitigation through agricultural easements can take at least two forms: the outright purchase of easements or the donation of mitigation fees to a local, regional, or statewide organization or agency whose purpose includes the acquisition and stewardship of agricultural easements. The conversion of agricultural land should be deemed an impact of at least regional significance. Hence, the search for replacement lands should not be limited strictly to lands within the project's surrounding area.

A helpful source for regional and statewide agricultural mitigation banks is the California Council of Land Trusts. They provide helpful insight into farmland mitigation policies and implementation strategies, including a guidebook with model policies and a model local ordinance. The guidebook can be found at:

[California Council of Land Trusts](#)

Of course, the use of conservation easements is only one form of mitigation that should be considered. Any other feasible mitigation measures should also be considered. Indeed, the recent judicial opinion in *King and Gardiner Farms, LLC v. County of Kern* (2020) 45 Cal.App.5th 814 (“KG Farms”) holds that agricultural conservation easements on a 1 to 1 ratio are not alone sufficient to adequately mitigate a project's conversion of agricultural land. KG Farms does not stand for the proposition that agricultural conservation easements are irrelevant as mitigation. Rather, the holding suggests that to the extent they are considered, they may need to be applied at a greater than 1 to 1 ratio, or combined with other forms of mitigation (such as restoration of some land not currently used as farmland).

Conclusion

DOC recommends further discussion of the following:

- Type, amount, and location of farmland conversion resulting directly and indirectly from implementation of the proposed project.
- Impacts on any current and future agricultural operations in the vicinity; e.g., land-use conflicts, increases in land values and taxes, loss of agricultural support infrastructure such as processing facilities, etc.
- Incremental impacts leading to cumulative impacts on agricultural land. This would include impacts from the proposed project, as well as impacts from past, current, and likely future projects.

- Proposed mitigation measures for all impacted agricultural lands within the proposed project area.

Thank you for giving us the opportunity to comment on the Notice of Preparation of an Environmental Impact Report for the Arroyo Vista Project. Please provide DOC with notices of any future hearing dates as well as any staff reports pertaining to this project. If you have any questions regarding our comments, please contact Farl Grundy, Associate Environmental Planner via email at Farl.Grundy@conservation.ca.gov.

Sincerely,

A handwritten signature in black ink that reads "Monique Wilber". The script is cursive and fluid.

Monique Wilber

Conservation Program Support Supervisor

April 3, 2023

RAMV
Debbie Walsh
PO Box 2244
Perris, CA 92572

Riverside County Planning Director
4080 Lemon Street, 1st Floor
Riverside, CA 92502

Attn: Principal Planner Krista Mason kmason@rivco.org:

RE: Scoping Meeting.

General Plan Amendment No. 220009, Change of Zone No. 2200031, Tentative Parcel Map No. 38510.

PROJECT LOCATION AND DESCRIPTION: The proposed Project consists of applications for a General Plan Amendment, Change of Zone, and Tentative Parcel Map for proposed development of 232 residential lots on 140.8-acres. The 232 residential lots will be clustered on 87.7 acres. The smaller lots (10,890 – 14,520 square foot lots) will be clustered within the internal areas and the larger ½ to 1 acre lots will be along the north, east, northwest and southern project boundaries to buffer the site from the surrounding rural residential neighborhoods. Approximately 25 acres will be designated natural open space including a trailhead, 4.9 acres for water quality basins, a sewer lift station on 0.25-acre, and street improvements and right-of-way dedications on approximately 23.0 acres. Recreational trails measuring between 10 and 16 feet in width will be provided adjacent to the natural drainage area.

This Project requires a Foundation General Plan Amendment.

The Project proposes to amend the zoning for a number of parcels from A-1 to R-1. The Project has not requested a Foundation General Plan Amendment as required under the Riverside County General Plan. Therefore this Project must request a Foundation General Plan Amendment before moving forward. This Project also must include an EIR.

The Foundation General Plan Amendment process takes place every 8 years during the General Plan Update.

The County “must” wait until the Foundation General Plan Amendment Process starts before this Project can move forward.

The Project zone changes being requested require a Foundation GPA. The Woodcrest area consists of rural land uses with one acre minimum lot sizes. The proposed Project is requesting lots sizes of 10,000 sq ft. Less than one quarter of an acre.

Woodcrest is designated as a Rural Community.

ATTACHMENT A

General Plan

Land Use Designations Summary

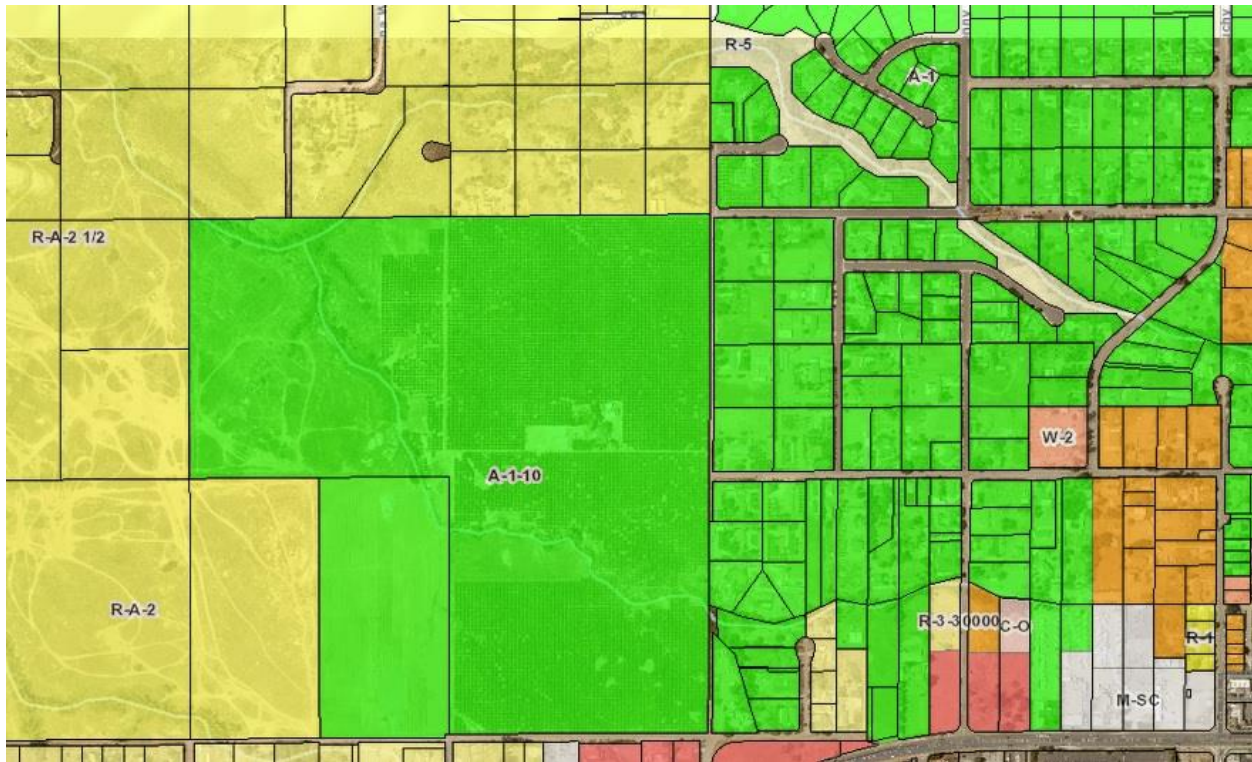
Foundation Component	Area Plan Land Use Designation	Building Intensity Range (du/ac or FAR) ^{1, 2, 3, 4}	Notes
Agriculture	Agriculture (AG)	10 ac min.	<ul style="list-style-type: none"> Agricultural land including row crops, groves, nurseries, dairies, poultry farms, processing plants, and other related uses. One single-family residence allowed per 10 acres except as otherwise specified by a policy or an overlay.
Rural	Rural Residential (RR)	5 ac min.	<ul style="list-style-type: none"> Single-family residences with a minimum lot size of 5 acres. Allows limited animal keeping and agricultural uses, recreational uses, compatible resource development (not including the commercial extraction of mineral resources) and associated uses and governmental uses.
	Rural Mountainous (RM)	10 ac min.	<ul style="list-style-type: none"> Single-family residential uses with a minimum lot size of 10 acres. Areas of at least 10 acres where a minimum of 70% of the area has slopes of 25% or greater. Allows limited animal keeping, agriculture, recreational uses, compatible resource development (which may include the commercial extraction of mineral resources with approval of a SMP) and associated uses and governmental uses.
	Rural Desert (RD)	10 ac min.	<ul style="list-style-type: none"> Single-family residential uses with a minimum lot size of 10 acres. Allows limited animal keeping, agriculture, recreational, renewable energy uses including solar, geothermal and wind energy uses, as well as associated uses required to develop and operate these renewable energy sources, compatible resource development (which may include the commercial extraction of mineral resources with approval of SMP), and governmental and utility uses.
Rural Community	Estate Density Residential (RC-EDR)	2 ac min.	<ul style="list-style-type: none"> Single-family detached residences on large parcels of 2 to 5 acres. Limited agriculture, intensive equestrian and animal keeping uses are expected and encouraged.
	Very Low Density Residential (RC-VLDR)	1 ac min.	<ul style="list-style-type: none"> Single-family detached residences on large parcels of 1 to 2 acres. Limited agriculture, intensive equestrian and animal keeping uses are expected and encouraged.
	Low Density Residential (RC-LDR)	0.5 ac min.	<ul style="list-style-type: none"> Single-family detached residences on large parcels of 0.5 to 1 acre. Limited agriculture, intensive equestrian and animal keeping uses are expected and encouraged.
Open Space	Conservation (C)	N/A	<ul style="list-style-type: none"> The protection of open space for natural hazard protection, cultural preservation, and natural and scenic resource preservation. Existing agriculture is permitted.
	Conservation Habitat (CH)	N/A	<ul style="list-style-type: none"> Applies to public and private lands conserved and managed in accordance with adopted Multiple Species Habitat and other Conservation Plans.
	Water (W)	N/A	<ul style="list-style-type: none"> Includes bodies of water and natural or artificial drainage corridors. Extraction of mineral resources subject to SMP may be permissible provided that flooding hazards are addressed and long term habitat and riparian values are maintained.
	Recreation (R)	N/A	<ul style="list-style-type: none"> Recreational uses including parks, trails, athletic fields, and golf courses. Neighborhood parks are permitted within residential land uses.
	Rural (RUR)	20 ac min.	<ul style="list-style-type: none"> One single-family residence allowed per 20 acres. Extraction of mineral resources subject to SMP may be permissible provided that scenic resources and views are protected.
	Mineral Resources (Min)	N/A	<ul style="list-style-type: none"> Mineral extraction and processing facilities. Areas held in reserve for future mineral extraction and processing.

Issues of concern.

1. Findings for Foundation Component General Plan Amendment cannot be made.
2. (Ord. 348 § 2.5 (B).) Pursuant to Ordinance 348 Section 2.5 (F), a regular Foundation Component Amendment must include findings, based on substantial evidence:
 - (a) That new conditions or circumstances disclosed during the review process justify modifying the General Plan;
 - (b) That the modifications do not conflict with the overall Riverside County Vision, and
 - (c) That they would not create an internal inconsistency among the elements of the General Plan.
3. **General Plan Amendments proposing a change of land use designation from one Foundation Component to another will only be entertained by the County of Riverside at eight-year intervals. Next eight-year interval Foundation General Plan Amendment initiation is scheduled to take place 2024.**
4. Violations of the General Plan and Woodcrest Area plan Vision.
5. Violations of the General Plan and Ordinance 348 Section 2.5.
6. Surrounding rural roads are not equipped for thousands of vehicles.
7. The area has some of the worst smog in the nation.
8. Traffic impacts.
9. Health Impacts.

<ul style="list-style-type: none"> • Aesthetics • Agriculture & Forest Resources • Air Quality • Biological Resources • Cultural Resources • Energy • Geology / Soils • Greenhouse Gas Emissions • Hazards & Hazardous Materials • Hydrology/ Water Quality • Land Use / Planning 	<ul style="list-style-type: none"> Mineral Resources Noise Paleontological Resources Population / Housing Public Services Recreation Transportation Tribal Cultural Resources Utilities / Service Systems Wildfire Mandatory Findings of Significance
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The Project includes an arroyo with a blue line stream flowing through it. This must be protected.



The last initiation of the Foundation General Plan Amendment was 2016. The next year that the Foundation General Plan Amendments is set for initiation is 2024.

See 2016 FGPA Process attached.

See ordinance 348 Foundation GPA. 2.5

FINDINGS FOR FOUNDATION COMPONENT GENERAL PLAN AMENDMENT CANNOT BE MADE

FGPA for this Project cannot be initiated as the required findings for approving such an amendment are unsupported by substantial evidence and cannot be made. This Project is subject to a Foundation General Plan Amendment with an eight-year approval cycle. (Ord. 348 § 2.5 (B).) Pursuant to Ordinance 348 Section 2.5 (F), a regular Foundation Component Amendment must include findings, based on substantial evidence:

- (1) That new conditions or circumstances disclosed during the review process justify modifying the General Plan;
- (2) That the modifications do not conflict with the overall Riverside County Vision, and
- (3) That they would not create an internal inconsistency among the elements of the General Plan.

1b. There are no new conditions or circumstances that justify a Foundation General Plan Amendment.

2b. Modifications would conflict with the Riverside County Vision and Lake Mathews/Woodcrest Area Plan.

3b. This Project would create an internal inconsistency among the elements of the General Plan by changing rural residential zoning to allow high density housing outside of the established rural community.

General Plan Administrative Element. A-12

3. Foundation Amendment Findings. The premise for a Foundation Amendment is that the General Plan will only be amended in any fundamental way for significant cause. The intent with Foundation Amendment Findings is to consider them comprehensively in the context of the entire General Plan and their overall impacts on the Riverside County Vision and its implementation. A Foundation Amendment may occur in two ways. The first would be as part of a regular General Plan Review cycle. The first finding is required for this type of amendment. The second means of making a Foundation Amendment would be as a result of extraordinary events. The first two and any one or more of the subsequent findings will be necessary to justify an Extraordinary Amendment, which does not have to comply with the General Plan Review cycle:

a. The foundation change is based on substantial evidence that new conditions or circumstances disclosed during the review process justify modifying the General Plan, that the modifications do not conflict with the overall Riverside County Vision, and that they would not create an internal inconsistency among the elements of the General Plan.

b. A condition exists or an event has occurred that is unusually compelling and can only be rectified by making changes in the current Riverside County Vision, Principles, or Policies. An Extraordinary Amendment must still result in a consistent direction for the subsequent planning period. The condition stimulating such an amendment may involve private properties, public properties or both.

GP Page 10 Vision

Clarity in Land Use Guidance

Completely Mapped Policy: Land use mapping at the General Plan level (see Chapter 3, Land Use Element) depicts four “Foundation” Components, while Area Plans use a streamlined, consistent set of land use designations that fall under the umbrella of the Foundation Components.

The Foundation Components: The RCIP Vision calls for the land uses in Riverside County to be clearly mapped, and areas suitable for development or agriculture to be easily distinguishable from those to be permanently conserved, either for habitat or to accommodate natural resources or open space. As a result, the land use designations used in this General Plan fall under the umbrella of five Foundation Components, or major categories of Riverside County land use: **Community Development, Rural, Rural Community, Agriculture, and Multipurpose Open Space**. The countywide map of land use delineates only those five Foundation Components (see Chapter 3, Land Use Element).

As detailed in the description of the General Plan Certainty System (see general description below and Chapter 11, Administration), the significance of these foundation components is that **General Plan Amendments proposing a change of land use designation from one Foundation Component to another will only be entertained by the County of Riverside at eight-year intervals.**

Preserving Stability and Flexibility in the Plan Over Time: The Certainty System

The Riverside County General Plan Certainty System provides clarity regarding the interpretation and use of the General Plan in ongoing decision making, and seeks to sustain the Plan's policy direction over time (see Chapter 10, Administration). It recognizes that circumstances will change, imperfections in the Plan will be discovered, and events will occur that require changes in the Plan. The overriding consideration, however, is the absolute necessity to maintain a high level of confidence in the Plan and enable people affected by it to have reasonable expectations regarding how the Plan will impact them. **The Certainty System serves the needs of those who value a rural lifestyle**, farmers who have invested in their operations, and developers who want to ensure return on their investments. The System also ensures that open space is preserved in Riverside County for the benefit of all.

Administrative Element General Plan.

Healthy Communities General Plan element

Open Space, Rural, Rural Community and Agriculture Land Uses

These policies are intended for Open Space, Rural, Rural Community, and Agriculture areas, which were designated in this General Plan to preserve the rural lifestyle that is an integral part of the character and appeal of Riverside County. Agriculture defines the unique character of many communities in Riverside County, and helps to define the edges of and provide separation between developed areas. Widespread and diverse agricultural lands are one of Riverside County's most important land uses in terms of historic character, economic strength and human health.

When local agricultural products are grown and distributed locally, people have better access to high quality, nutritious food. In addition, local food sources are closer to local retailers and thus require less in terms of transportation costs and fossil fuel. The goal of this section is to promote development patterns in Rural and Agricultural areas that are consistent with the General Plan Vision and which promote healthy lifestyles.

Policies:

HC 4.1 Promote healthy land use patterns by doing each of the following to the extent feasible: (AI 137)

- a. Preserving rural open space areas, and scenic resources.
- b. Preventing inappropriate development in areas that are environmentally sensitive or subject to severe natural hazards.
- c. Developing incentives, such as transfer of development rights, clustered development, development easements, and other mechanisms, to preserve the economic value of agricultural and open space lands.

Environmental Health

People today are exposed to an unprecedented amount of harmful substances ranging from particulate matter and emissions from auto and industrial sources to toxic pesticides and ingredients found in every day household and pharmaceutical products. These harmful substances enter into our air and water supplies and accumulate in our bodies causing a range of health effects such as increased respiratory illnesses, cancer and other chronic health

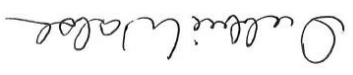
problems. Consequently, decisions about the location and mix of land uses, transportation investments, design and building practices and building materials can all have an impact on the environment and human health.

Motor vehicles are the principal source of particulate matter and other pollutants that contribute to poor air quality and associated respiratory illnesses. In general, the more vehicle miles traveled in a region, the worse the air pollution. Factories, concentrated in heavily industrial areas, are equally problematic.

The County must follow the law. This Project requires following CEQA, the General Plan, the Lake Mathews/ Woodcrest Area Plan, State laws, habitat laws and regulations.

This Project cannot complete the required Foundation General Plan Amendment.

Sincerely,



Debbie Walsh

Rural Association of Mead Valley



Hans W. Kernkamp, General Manager-Chief Engineer

SENT VIA EMAIL ONLY

kmason@rivco.org

March 14, 2023

Krista Mason, Urban Regional Planner IV
Riverside County Planning Department (County)
4080 Lemon St.
P.O. Box 1409
Riverside, CA 92502

RE: Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for Arroyo Vista (GPA220009, CZ2200031, and TTM38510)

Dear Ms. Mason:

The Riverside County Department of Waste Resources (RCDWR) has reviewed the NOP addressing a DEIR for the proposed Arroyo Vista Project (Project). The Project includes various applications to allow for the development of 232 single-family residential lots. The RCDWR offers the following comments for your consideration while preparing the Project's DEIR.

1. Construction of the Project may generate a substantial quantity of construction and demolition (C&D) waste. Should a large quantity of C&D waste, that is unable to be recycled, be brought to a County landfill for disposal, it could exceed the landfill's daily permitted capacity, thus a violation of state regulations.¹ To assess waste impacts, the DEIR should consider quantitatively analyzing this potential solid waste impact and discuss feasible mitigation programs/regulatory compliance.

Note: CalRecycle's website may be helpful to determine the Project's waste generation:

<https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates>

2. The following information can be useful in the analysis of the solid waste impacts:
 - a) Solid waste generated within the Project area is collected by WMI, with the bulk of recyclable waste and green waste delivered to the Moreno Valley Solid Waste Recycling and Transfer Station (MVRTS) for processing. The facility is located at 17700 Indian Street in Moreno Valley. It is permitted for a 2,500 tons per day (tpd) operation.
 - b) The waste hauler may utilize the El Sobrante, Lamb Canyon, and/or the Badlands Landfill for disposal. Descriptions of the local landfills are provided below:

El Sobrante Landfill:

The El Sobrante Landfill is located east of Interstate 15 and Temescal Canyon Road to the south of the City of Corona and Cajalco Road at 10910 Dawson Canyon Road. The

¹ Title 40, Vol. 41 C.F.R § 243.203 *et seq.* (1976).

landfill is owned and operated by USA Waste of California, a subsidiary of Waste Management, Inc., and encompasses 1,322 acres, of which 645 acres are permitted for landfill operation. The El Sobrante Landfill has a total disposal capacity of approximately 209.9 million cubic yards and can receive up to 70,000 tons per week (tpw) of refuse. USA Waste must allot at least 28,000 tpw for County refuse. The landfill's permit allows a maximum of 16,054 tons per day (tpd) of waste to be accepted into the landfill, due to the limits on vehicle trips. If needed, 5,000 tpd must be reserved for County waste, leaving the maximum commitment of Non-County waste at 11,054 tpd. Per the 2021 Annual Report, the landfill had a remaining in-County disposal capacity of approximately 50.1 million tons.² In 2022, the El Sobrante Landfill accepted a daily average of 10,646 tons with a period total of approximately 3,278,846 tons. The landfill is expected to reach capacity in approximately 2057.

Lamb Canyon Landfill:

The Lamb Canyon Landfill is located between the City of Beaumont and City of San Jacinto at 16411 Lamb Canyon Road (State Route 79), south of Interstate 10 and north of Highway 74. The landfill is owned and operated by Riverside County. The landfill property encompasses approximately 1,189 acres, of which 703.4 acres encompass the current landfill permit area. Of the 703.4-acre landfill permit area, approximately 144.6 acres are permitted for waste disposal. The landfill is currently permitted to receive 5,000 tpd of MSW for disposal and 500 tpd for beneficial reuse. The site has an estimated total disposal capacity of approximately 21.1 million tons.³ As of January 1, 2023 (beginning of day), the landfill has a total remaining capacity of approximately 7.3 million tons.³ The current landfill remaining disposal capacity is estimated to last, at a minimum, until approximately 2032.⁴ From January 2022 to December 2022, the Lamb Canyon Landfill accepted a daily average of 1,969 tons with a period total of approximately 606,481 tons. Landfill expansion potential exists at the Lamb Canyon Landfill site.

Badlands Landfill:

The Badlands Landfill is located northeast of the City of Moreno Valley at 31125 Ironwood Avenue and accessed from State Highway 60 at Theodore Avenue. The landfill is owned and operated by Riverside County. The existing landfill encompasses 1,168.3 acres, with a total permitted disturbance area of 278 acres, of which 150 acres are permitted for refuse disposal. The landfill is currently permitted to receive 4,500 tpd of MSW for disposal and 300 tpd for beneficial reuse. The site has an estimated total capacity of approximately 21.4 million tons.⁶ As of January 1, 2023 (beginning of day), the landfill had a total remaining disposal capacity of approximately 3.5 million tons.⁷ The current landfill remaining disposal capacity is estimated to last, at a minimum, until approximately 2026.⁸ From January 2022 to December 2022, the Badlands Landfill accepted a daily average of 2,660 tons with a

² 2021 El Sobrante Landfill Annual Report- Based on 125,193,774 tons remaining capacity (40% for in-county waste).

³ GASB 18_2022 – Engineering Estimate for total landfill capacity

³ GASB 18_2022 & SiteInfo

⁴ SWFP # 33-AA-0007

⁶ GASB_18_2022 – Engineering Estimate for total landfill capacity

⁷ GASB_18_2022 & SiteInfo

⁸ SWFP # 33-AA-0006

period total of approximately 819,166 tons. Landfill expansion potential exists at the Badlands Landfill site.

3. Additionally, the following measures may help to reduce the Project's anticipated solid waste impacts and enhance efforts to comply with the State's mandate (AB 75) of 50% solid waste diversion from landfilling⁹:

- The use of mulch and/or compost in the development and maintenance of landscaped areas within the project boundaries is recommended. Recycle green waste through either onsite composting of grass, i.e., leaving the grass clippings on the lawn, or sending separated green waste to a composting facility.
- Consider xeriscaping and the use of drought tolerant low maintenance vegetation in all landscaped areas of the project.
- Hazardous materials are not accepted at the Riverside County landfills. Any hazardous wastes, including paint, used during construction must be properly disposed of at a licensed facility in accordance with local, state and federal regulations. For further information regarding the determination, transport, and disposal of hazardous waste, please contact the Riverside County Department of Health, Environmental Protection and Oversight Division, at 1.888.722.4234.
- To address solid waste impacts and help the County comply with AB 939 (Integrated Waste Management Act) and the California Green Building Standards, through diverting solid waste from landfill disposal, a Waste Recycling Plan (WRP) shall be submitted to the Riverside County Department of Waste Resources for review and approval prior to construction. At a minimum, the WRP must identify the materials (i.e., concrete, asphalt, wood, etc.) that will be generated by construction and development, the projected amounts, the measures/methods that will be taken to recycle, reuse, and/or reduce the amount of materials, the facilities and/or haulers that will be utilized, and the targeted recycling or reduction rate. During project construction, the project site shall have, at a minimum, two (2) bins: one for waste disposal and the other for the recycling of Construction and Demolition (C&D) materials. Additional bins are encouraged to be used for further source separation of C&D recyclable materials. Accurate record-keeping (receipts) for recycling of C&D recyclable materials and solid waste disposal must be kept. After the project is completed, a Waste Reporting Form and evidence (i.e., receipts or other types of verification) shall be submitted demonstrating project compliance with the approved WRP.
- Demonstrate compliance with SB 1383 which establishes regulations to reduce organics waste disposal and went into effect on January 1, 2022.⁵ This law establishes methane emissions reduction targets in a statewide effort to reduce emissions of short-lived climate pollutants caused by organics waste disposal.

⁹ A.B. 75, Chapter 764, 1999-2000 Strom-Martin, (Cal. 1999).

⁵ S.B 1383, Chapter 395, 2015-2016 Lara, (Cal. 2016).

Krista Mason, Urban Regional Planner IV
Riverside County Planning Department (County)
NOP DEIR – Arroyo Vista Project
March 14, 2023
Page 4

Thank you for allowing us the opportunity to comment on the NOP. Please continue to provide us with Project updates and any CEQA documentation, as the Project progresses. Please email me at Kaavila@rivco.org if you have any questions regarding the above comments.

Sincerely,

A handwritten signature in black ink, appearing to be 'Ka', followed by a horizontal line.

Katherine Avila
Urban/Regional Planner I

Cc: Kinika Hesterly, RCDWR

DM# 311521

From: kathleen.crook214
To: [Mason, Krista](mailto:KMason@Rivco.org)
Subject: RE: Arroyo Vista Project Woodcrest TTM38510
Date: Thursday, March 30, 2023 3:54:56 PM
Attachments: [Arroyo Project Comments by Kathleen Crook.pdf](#)

Hello Krista,
Please see the attached letter with comments related to the Arroyo Vista Project.

Also, where can I find the CEQA Appendix G? Can you provide a link?

Thank you.

Kathleen Crook

Sent from my Verizon, Samsung Galaxy smartphone

----- Original message -----

From: "Mason, Krista" <KMason@Rivco.org>
Date: 3/29/23 2:56 PM (GMT-08:00)
To: "kathleen.crook214" <kathleen.crook214@gmail.com>
Subject: RE: Arroyo Vista Project Woodcrest TTM38510

Hi Kathleen,

Thank you for your email. You can send your comments directly to me via email. During the scoping meeting items and/or concerns that can be addressed within the scope of the EIR should be illuminated. If you have concerns that the change of zone is impactful I would include this comment and justification. You can review CEQA: Appendix G for more information.

Thank you,

Krista

From: kathleen.crook214 <kathleen.crook214@gmail.com>
Sent: Wednesday, March 29, 2023 10:37 AM
To: Mason, Krista <KMason@Rivco.org>
Subject: Arroyo Vista Project Woodcrest TTM38510

CAUTION: This email originated externally from the Riverside County email system. **DO NOT** click links or open attachments unless you recognize the sender and know the content is safe.

Hello Krista,

I have a question regarding the upcoming Public Scoping Meeting scheduled April 3 @ 1:30pm related to the Arroyo Vista Project Environmental Impact report.

Is this meeting only to address the Environmental Impact portion or will the rezoning issue also be addressed? I share a property line with the project property.

Also, I will be submitting comments related to all impacts from this proposed project. Is it best to email comments directly to you related to the Environmental Impact? Please feel free to respond via phone or email.

Kathleen Crook

714-423-4868

15765 Cartwright Dr

Riverside, CA 92508

Sent from my Verizon, Samsung Galaxy smartphone

Confidentiality Disclaimer

This email is confidential and intended solely for the use of the individual(s) to whom it is addressed. The information contained in this message may be privileged and confidential and protected from disclosure. If you are not the author's intended recipient, be advised that you have received this email in error and that any use, dissemination, forwarding, printing, or copying of this email is strictly prohibited. If you have received this email in error please delete all copies, both electronic and printed, and contact the author immediately.

Petition to Change Building Plans

We, the undersigned, vehemently oppose the development as proposed (PAR210156 – TK Consulting), a residential development located North of Iris Avenue between Chicago and Porter.

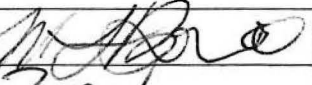
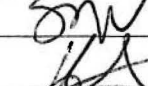
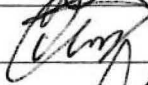
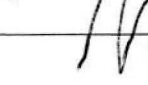

We believe the County of Riverside Planning Commission should limit the amount of traffic from this development emptying onto Iris Ave. The West thoroughfare egress on Iris Ave. just East of Gamble Ave. would increase traffic on Gamble more than tenfold (potentially 100-fold). While we are willing to make sacrifices in the face of progress, we believe the entire community must share in this sacrifice. There is no reason the residents on Gamble and Iris should bear the entire traffic burden; hence, we propose TK Consulting make changes in their plans to include East and North egress from the development. In doing so, this preserves the character, scale, and proportion of the effect on properties in our neighborhood, while also remaining committed to orderly development and maintaining a high quality of life for everyone – there must be equitable sacrifices of the entire community.

Should the County of Riverside Planning Commission approve the proposed development, it will have an immediate, negative impact on homes on Iris and Gamble. A potentially catastrophic increase in traffic onto this neighborhood impacts the privacy, noise, quality of life of those surrounding it. The project developer is working with the community to lessen its impact on the rural character of Woodcrest, which is a primary character that people seek out when looking to purchase a home within our neighborhood. An increase in noise and light pollution by having 230 household traffic emptying entirely onto Iris Avenue at Gamble would be catastrophic to our quality of life. Adding egress to the East at Hibiscus Ave and Northeast corner at Gentian Ave is a compromising solution so as not to place the entire burden to people living south of this development.

We hope that the Riverside County Planning Commission and Supervisor will agree with our petition to modify the existing plans for this development and help preserve this area of Woodcrest and ensure their citizens continue to live a high-quality of life within the area. Everyone must share in the sacrifice to enable more housing in this area, not just a minority few.

Sign this petition:

Name of Voter	Signature	Address	Date
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Michelle L Brinkmann		16040 Gamble Ave 92508	8-25-2022
ZACK Willett		16040 GAMBLE AVE 92508	8-25-2022
Kara Allen		16040 Gamble Ave 92508	8/25/2022
Chantay Brinkmann		16040 GAMBLE AVE 92508	8/25/2022
Bob PINTICK		16040 (-) c/wide Ave 92508	8-25-22

Petition Signature; Page 2

Name of Voter

Signature

Address

Date[illegible]



IRIS →

← GAMBLE AVE. ←

V

[illegible]

Petition Signature; Page 2

Name of Voter

Signature

Address

Date[illegible]

Petition to Change Building Plans


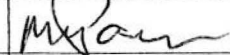
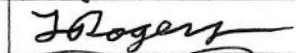


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Sign this petition:

Name of Voter	Signature	Address	Date
Tracey Gross		16221 Gamble Ave	8-27-22
Matthew Powers		16221 GAMBLE AVE	8-27-22
Trevor Rogers		16016 Gamble Ave.	09/02/2022
Bruce Rogers		16016 GAMBLE AVE.	9/02/2022
Michelle Rogers		16016 Gamble Ave.	9/02/2022

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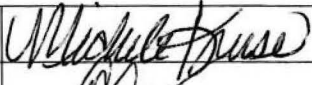
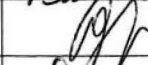
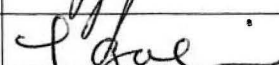
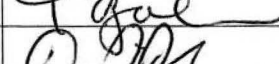

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Sign this petition:

Name of Voter	Signature	Address	Date
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Michelle Kruse		16015 Gamble Ave Div. 97505	8/26/22
Robert J. Burgess		16016 Porter Ave	8.26.22
Theresa Galvin		18010 Ins Ave	8/27/22
David Galvin		18010 Ins Ave	8/27/22
Deborah Kruse		16015 Gamble	8/27/22

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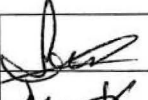



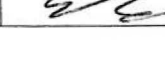
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Dave Klevens		16005 Gamble Ave	8-25-22
Jim Klevens		16005 Gamble Ave	8-25-22
Max Klevens		16005 Gamble Ave	8-25-22
Amanda Terkelsen		16025 Gamble Ave	8/25/22
Erik Terkelsen		16025 Gamble Ave	8/25/22

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Sign this petition:

Name of Voter	Signature	Address	Date
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Robert Scofic	Robert Scofic	16025 PORTER AVE	9-3-22
Diane Pulliam	Diane Pulliam	16016 Porter Ave	9/7/22
Matt Hytton	Matt Hytton	16078 Porter Av.	9/14/22
Karen Allcott	Karen Allcott	17555 Iris Ave	9/15/22
GLEN JENSEN	Glen Jensen	16091 Porter Av	9/15/22

From: [Mason, Krista](#)
To: [Rogers, Bruce](#)
Subject: RE: Arroyo Vista Project; Woodcrest
Date: Wednesday, March 29, 2023 3:24:00 PM

Hi Bruce,

The project is currently in the review process. The petition that was submitted I forwarded directly to the applicant/consultant for review. The ingress/egress, access and traffic study will be reviewed by the Transportation department and compared with the County's General Plan for consistency. I suggest you express your concerns to the applicant and the transportation department about the circulation and project design. Please let me know if you would like the contact information.

Best regards,

Krista Mason

From: Rogers, Bruce <BRogers@RivCoDA.org>
Sent: Friday, March 24, 2023 11:53 AM
To: Mason, Krista <KMason@Rivco.org>
Subject: Arroyo Vista Project; Woodcrest

Hi Krista, I spoke with a few residents who lives on Gamble last night. Per the petition that was submitted, they are very concerned about the traffic that this project will bring to Gamble street. A few of the residents suggested Gamble be closed off and made into a cul-de-sac or a gate put up and only emergency vehicle access point. No one objected as long as there is a pedestrian and/or bicycle throughway. Please give me your thoughts on this idea.

Sr. Inv. Bruce Rogers

Riverside County DA's Office

Juvenile Division

Office: 951-358-4240

Cell: 951-722-6716

Email: brogers@rivcoda.org