



July 31, 2024

**Harry Sandoval, Environmental Project Manager
County of Riverside
Environmental Programs Division
4080 Lemon Street
Riverside, CA 92501**

Subject: Supplemental Addendum to the DBESP for Corona Clay Project (HANS 002278), County of Riverside.

Dear Mr. Sandoval:

This supplemental addendum has been prepared to address the comments from the US Fish and Wildlife Service (USFWS) and California department of Fish and Wildlife (CDFW). WSP USA Inc. (WSP USA) has reviewed the agency comments and addressed them below.

RIPARIAN/RIVERINE RESOURCES

The agencies commented that the DBESP describes the online drainages as arid, sandy washes vegetated by sparse upland plant species. However, there are some riparian plants listed in the biological surveys reports for the project site. The agencies have asked for help to underside the onsite riverine/riparian resources.

The drainages onsite are all ephemeral dry washes. The vegetation was originally mapped as upland alluvial scrub. There are some small patches of riparian vegetation within the drainages including mulefat (*Baccharis salicifolia*), and coast live oak (*Quercus agrifolia*) along the washes. These areas were considered too small to map as a separate habitat type. Generally, habitat patch needs to be approximately 0.1 acres or more to map it as a separate habitat classification. To help clarify any confusion a map has been prepared showing the small riparian patches within the riverine areas of the site (Figure 1).

URBAN/WILDLIFE INTERFACE GUIDELINES

The Wildlife Agencies appreciate the description of biological functions and values on the Project site presented in the DBESP, and the recognition of MSHCP Section 6.1.4 Urban-Wildlands-Interface Guidelines. However, the Indirect Effects section of the DBESP did not include a discussion of how edge effects from ongoing activities on the site or excavation of the new desilting basins to the avoided riparian/riverine resources and adjacent off-site conservation will be prevented or minimized.

The operation of the motocross tracks will not be allowed to have lights pointed at riparian areas or other conservation areas. During track construction and maintenance, no side casting of soil or any other materials off the side of a track will be allowed. This will protect

any addition of sediment into riparian/riverine areas or onto slopes containing native shrub habitats. If any impacts to conservation areas occur the disturbance will be fully restored at the cost of the offending party. Required action may include planting of native species, hand removal of side cast sediment, or refuse clean-up.

LONG-TERM CONSERVATION

A “Settlement Agreement and Release” between the County of Riverside and Corona Clay as of December 4, 2018, resolved past impacts and “all existing land use violations” as stated under the Agreement’s Section III. 2, “Full and Final Agreement.” The parties agreed that this is intended to be the comprehensive resolution of all existing land use violations on the Property and that this agreement is intended to be a full and final settlement of all claims subject to this Agreement.” Per the Agreement, a *General Plan Amendment (GPA)* and *Change of Zoning (CZ)* as described below were required to change the land use designations and zoning of developed lands and those lands designated for conservation habitat in order to be consistent with the General Plan, the zoning ordinance, and the HANS development footprint (HANS 2278 Final Map; 9/24/2018). The conservation areas will be protected from development and unauthorized activities and be managed by a third-party land management organization. A *Western Riverside County Multiple Species Habitat Conservation Plan Consistency Analysis* was prepared (WSP 2021, updated January 2024) that determined that the project would be consistent with the goals and objectives of the MSHCP with implementation of proposed conservation, restoration, and recommendations.

The conservation areas will be protected from development and unauthorized activities and be managed by a third-party land management organization.

The GPA and CZ, are described below.

General Plan Amendment 01144

Per the Agreement between the County and Corona Clay dated in December 2018, Section I.2. of the Agreement required a GPA to change the land use designation of developable portions of the property to Open Space – Recreation (OS-REC) (59.7 acres) and the land use designations of the non-developable portions to Conservation Habitat (OS-CH) (50.8 acres) per the HANS development footprint (HANS 2278 Final Map – 9/24/2018).

GPA 01144 proposes to amend a total of approx. 110.5 acres as follows:

- 59.7 acres of Open Space – Mineral Resources (OS-MIN) to OS-REC;
- 29.4 acres of OS-MIN to Open Space – Conservation Habitat (OS-CH);
- 15.5 acres of Open Space – RURAL (OS-RUR) to OS-CH; and
- 5.9 acres of Open Space – WATER (OS-W) to OS-CH.



The final designation consists of 59.7 acres of OS-REC and 50.8 acres to OS-CH.

Change of Zone 06361

CZ 06361 will implement Section I.3 of the Agreement, which requires a change of the zoning classification of the Property to W-2 (Controlled Development – 59.7 acres)) for the developed portions of the property and change the zoning classification to N-A (Natural Assets – 50.8 acres) for the non-developable portions per the HANS development footprint (HANS 2278) as agreed by the County and Corona Clay.

CONCLUSION

In conclusion, this memorandum should provide the requested details requested by the agencies pertaining the Corona Clay Project. If you have any questions please let me know.

Sincerely,





A handwritten signature in black ink, appearing to read 'Dale Hameister', followed by a long, horizontal, sweeping line that extends to the right.

**Dale Hameister
Senior Biologist
WSP USA**

Cell – 831.238.0676



Corona Clay has stripped the red clay track material and covered this area with topsoil.

-  Project Boundary
-  Project Parcels
-  Riparian Area (WSP 2024)
-  MSHCP Riparian/Riverine



1 inch = 300 feet
0 300 Feet

FIGURE 1
Depressions and Drainages
Amendment to the DBESP
Corona Clay Company
Riverside County, CA

