| Regional Conservation Authority Western Riverside County | RCA Joint Project Review (JPR) Findings JPR #: <u>24-02-21-01</u> Date: <u>12/19/24</u> |
|-------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Project Information | |
| Permittee: | City of Jurupa Valley |
| Case Information: | MA 20269 – 1-15 Self Storage |
| | 14.3 acres (13.9 acres of permanent impacts and 0.3 acre of avoidance ²) of which 12.4 acres (12.1 acres of permanent impacts and 0.3 acre of avoidance) are located within the |
| Site Acreage ¹ : | Criteria Area ³ |
| Portion of Site Proposed f | or |
| MSHCP Conservation | |
| Area: | 0 acre |

Criteria Consistency Review

Consistency Conclusion: The project is consistent with both the Criteria and Other Plan requirements with implementation of the measures presented in these Findings (including any within the project information provided to the Regional Conservation Authority by the Permittee for this JPR).

 Applicable Core/Linkage:
 Existing Core A

 Area Plan:
 Eastvale Area Plan

| APN | Sub-Unit | Cell Group | Cell |
|------------------------------------------------------------|----------------------------------|------------|------|
| 152-060-006* 152-060-007* 152-060-009 152-020-010 | SU1 – Santa Ana River Central | N/A | 698 |

*Denotes APNs that are partially impacted. The City will require any future proposed development (discretionary action) in the remainder of these APNs to demonstrate MSHCP consistency and be processed through a separate joint project review.

Project Information

 a. Project Documentation. JPR submittal materials provided by the Permittee included a JPR Application Form (December 4, 2024); an Updated General Biological Assessment and Western Riverside County Multiple Species Habitat Conservation Plan Consistency Analysis (*Analysis*; December 5, 2024); and GIS shapefiles (June 18, 2024)

¹ Acreage totals may vary due to rounding

² The avoidance area is composed of 0.2 acre riparian/riverine habitat and 0.1 acre disturbed non-native vegetated habitat.

³ Joint Project Review (JPR) only occurs within MSHCP Criteria Cells. Any portion of the project that extends beyond the Criteria is not included as part of this JPR review nor these Findings.



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- b. **Project Location**. The project is located in the City of Jurupa Valley, immediately east of Interstate 15 (I-15), south of 68th Street and north of the Santa Ana River (Exhibit A). It is located in the northwestern portion of the MSHCP Area (Exhibit B).
- c. **Project Description**. The project will construct a Recreational Vehicle (RV) Self-Storage Facility, including a storage and office building, RV parking area, landscaping, a borrow area/detention basin, and related infrastructure. An access road will be constructed from 68th Street to the RV Storage Self-Storage Facility. The project also includes the creation of manufactured slopes, which will be confined to the project's development footprint.

Of the 14.3-acre project site, 12.4 acres are located within MSHCP Criteria Area (specifically within Cell 698). As such, only these 12.4 acres are the subject of these JPR Findings (hereafter referred to as the "**project site**"). According to the *Analysis*, the project site encompasses vacant land that is regularly disturbed by weed abatement activities and off-road vehicle use. It is relatively flat with onsite elevations ranging from 588 feet to 640 feet above mean sea level and vegetation communities present include unvegetated disturbed land, disturbed land with non-native vegetation, and small areas of mulefat scrub and riparian woodland. The mulefat scrub and riparian woodland vegetation communities are located along the southern edge of the project site and will be avoided by the project, which is further discussed in Section 6.1.2 below.

MSHCP baseline vegetation communities (1994) within the project site consist entirely of agricultural land (Exhibit C). Soil series within the project site include Grangeville loamy fine sand and Grangeville fine sandy loam, saline-alkali (Exhibit D).

The 12.4-acre project will result in a total of 12.1 acres of permanent impacts and 0.3 acre of avoidance. All impacts are permanent. No temporary impacts or offsite impacts are proposed. All staging of equipment and construction materials will be located within the proposed development footprint. No weed abatement or fuel modification zones are required. The project is located adjacent to existing and proposed conservation areas.

Relation to Reserve Assembly

a. **Reserve Assembly Summary**. As stated in Section 3.2.3 of the MSHCP, "Existing Core A consists of Prado Basin and the Santa Ana River, located in the northwest region of the Plan Area. This southwest-to-northeast trending swath of land is composed largely of Public/Quasi-Public Lands owned by a variety of entities, but it also contains a small number of privately-owned lands. The Core also functions as a Linkage, connecting Orange County to the west with San Bernardino County to the north. Existing Core A is connected to Existing Core B (Cleveland National Forest) via both and upland and a riparian connection (Proposed Constrained Linkage 1 and Proposed Constrained Linkage 2, respectively). This Core is constrained on all sides by existing urban development and agricultural use, and planned land uses surrounding the Core consist largely of high impact land uses such as city and community development.



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Therefore, high quality riparian habitat within the Core and along the edges must be maintained for species such as southwestern willow flycatcher, yellow warbler, yellow-breasted chat, western yellow-billed cuckoo, and others listed in the table below. Guidelines Pertaining to Urban/Wildlands Interface for the management of edge factors such as lighting, urban runoff, toxics, and domestic predators are presented in Section 6.1 of this document [MSHCP]. Maintenance of existing floodplain processes and water quality along the Santa Ana River is also important to Santa Ana River woollystar and arroyo chub. Management entities in this existing Core include: the County of Riverside Parks and Open Space District, U.S. Army Corps of Engineers, Orange County Water District, and California Department of Parks and Recreation."

The project site is located within Independent Cell 698. As stated in Section 3.3.2 of the MSHCP, "Conservation within Cell will contribute to assembly of Existing Core A. Conservation within this Cell will focus on riparian scrub, woodland and forest and water habitats associated with Santa Ana River. Areas conserved within the Cell will be connected to riparian habitat proposed for conservation to the south in Cell 788 and to the east in Cell 699 of the Jurupa Area Plan. Conservation within this Cell will range from 35% to 5% of the southeastern portion of the Cell."

Cell 698 totals approximately 148.7 acres. Using the mid-range (40%) conservation goal, approximately 59.5 acres are described for conservation within this Cell. To date, 56.2 acres have been developed or are approved for development in Cell 698, which includes the 12.1-acre proposed project, as well as 9.0 acres of covered roads. There are 19.0 acres of Public-Quasi Public Lands within Cell 698 that cannot be counted towards the Additional Reserve Lands (ARL). There are 18.9 acres proposed for conservation through JPR 13-03-19-01. Therefore, with 18.9 acres proposed for conservation to date, an additional 40.6 acres of conserved lands that would contribute to Existing Core A are still needed for conservation in order for Cell 698 to achieve its mid-range conservation goal of 59.5 acres. There are currently 54.6 undeveloped acres available within Cell 698 that could functionally contribute to Existing Core A; therefore, Cell 698 could achieve its mid-range conservation goal. In conclusion, development of the project site would not impede the conservation goals for Existing Core A, nor result in issues regarding fragmentation.

b. **Rough Step.** The proposed project is within Rough Step Unit 1. In Rough Step 1 there are only three vegetation communities that have Rough Step acreage goals: coastal sage scrub; grasslands; and riparian scrub, woodland, forest.

Baseline vegetation (1994) mapping for the area of the site located within Criteria Cell 698 consists entirely of agricultural land, which is not tracked for this rough step (Exhibit C). Therefore, no additional measures regarding Rough Step are required and the proposed project does not conflict with Rough Step.



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Other Plan Requirements (MSHCP Volume I)

Section 6.1.2 – Was Riparian/Riverine/Vernal Pool Mapping or Information Provided?

Yes. Refer to Section 6.1.2 discussion below.

Section 6.1.3 – Was Narrow Endemic Plant Species Survey Information Provided?

Yes. Refer to Section 6.1.3 discussion below.

Section 6.3.2 – Was Additional Survey Information Provided?

Yes. Refer to Section 6.3.2 discussion below.

Section 6.1.4 – Was Information Pertaining to Urban/Wildland Interface Guidelines Provided?

Yes. The property is located adjacent to existing or proposed conservation areas.

Comments on Other Plan Requirements:

a. Section 6.1.2. The following discusses each requirement under this policy.

Riparian/Riverine. According to the *Analysis*, the project site contains approximately 0.2 acre of riparian/riverine resources within the southern portion of the site. This riparian/riverine resource includes mulefat scrub and riparian woodland that is associated with the Santa Ana River. The project will fully avoid the 0.2-acre riparian/riverine resources and will place a deed restriction over this resource. The total avoidance area of the project measures 0.3 acre, as it includes 0.2 acre of riparian/riverine habitat and 0.1 acre of disturbed, non-native vegetation (Exhibit E).

<u>AVOIDANCE AREA (DEED RESTRICTION) PROTECTIVE MECHANISM MEASURE.</u> Avoidance of MSHCP riparian/riverine resources (referred to as "Riparian/Riverine Avoidance Area" on Exhibit E) will be placed under a deed restriction prior to issuance of a grading permit.

Vernal Pools/Fairy Shrimp. According to the *Analysis*, the soils on site do not allow for water pooling for any significant length of time after rain events. No vernal pools, swales, or vernal pool mimics such as ditches, road ruts, or stock ponds with indicators of pooling water were observed within the project site. Due to the lack of vernal pool and/or other habitat suitable for fairy shrimp, focused surveys for fairy shrimp are not warranted.

Riparian Birds. The project site development footprint does not contain suitable habitat for least Bell's vireo (*Vireo bellii pusillus*), southwestern willow flycatcher (*Empidonax traillii extimus*), and yellow-billed cuckoo (*Coccyzus americanus*). However, there is suitable habitat (i.e., mulefat scrub and riparian woodland) along the southern project boundary that would be fully avoided by the project. Focused surveys for riparian bird species were not conducted for this avoidance area; and therefore, presence of Section 6.1.2 riparian bird species was assumed. The *Analysis* provides measures to avoid indirect impacts to riparian bird



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species (*Analysis*, pg. 14-15). This measure should be incorporated into the conditions of approval for the project. Furthermore, to avoid indirect impacts to riparian bird species, the project will implement Section 6.1.4, iii (below) to ensure that post-project ambient light levels within the MSHCP Conservation Area shall not exceed that of pre-project conditions as a result of light spill from the project site.

<u>RIPARIAN BIRD AVOIDANCE MEASURE</u>. To avoid indirect impacts, project construction and site preparation activities including but not limited to vegetation clearing and grubbing within 300 feet of Section 6.1.2 riparian/riverine bird (specifically least Bell's vireo [LBV], southwestern willow flycatcher [SWFL], and yellow-billed cuckoo [YBCU]) habitat will be conducted outside of the LBV/SWFL/YBCU breeding season (March 15 to September 30).

If construction activities must occur during the LBV/SWFL/YBCU breeding season, preconstruction surveys to determine if each of the species occurs within 300 feet of project construction, will occur once a week for three consecutive weeks within the breeding season, with the last visit no more than 3 days prior to commencement of construction activities. The preconstruction survey visits for LBV/SWFL/YBCU will be conducted by a qualified biologist familiar with each of the species' vocalizations characteristic of adults and juveniles. Surveys will be conducted between dawn and 11AM. Surveys will not be conducted during periods of excessive or abnormal cold, heat, wind, rain, or other inclement weather that individually or collectively may reduce the likelihood of detection. Surveys will not cover more than 3 linear kilometers (2 miles) or more than 50 hectares (123 acres) of habitat on any given day. Prior to performing the preconstruction surveys, a map will be created illustrating the LBV/SWFL/YBCU habitat and all detections of LBV/SWFL/YBCU will be mapped.

Directly following the preconstruction surveys, weekly clearance surveys will be performed following the same methodology stated above for the preconstruction surveys. All detections of LBV/SWFL/YBCU are to be mapped with behavior tracked across detections/sightings. The qualified biologist must have experience with nesting ecology and behavior of each of the Section 6.1.2 riparian/riverine bird species to determine pre-nesting/nesting behavior. The MSHCP does not provide "take" of LBV/SWFL/YBCU which includes negatively modifying foraging and nesting behavior. If at any time it is determined by the qualified biologist that construction activities are negatively affecting LBV/SWFL/YBCU, including modification of behavior, work will be halted and CDFW and USFWS will be contacted on next steps.

Daily noise monitoring will be required during the breeding season. A qualified biological monitor must be present to measure noise levels at the edge of all suitable habitat and work shall cease if, at any time, noise levels exceed the existing noise levels of 63.5 dBA. Noise monitoring will continue throughout the breeding season or until construction activities have halted within 300 feet of LBV/SWFL/YBCU habitat. CDFW and USFWS shall be contacted on next steps if the project not able to reduce the noise. Construction activities during the breeding season will be limited to the hours of 8AM to 7PM.



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Based on the information provided in the *Analysis*, the project demonstrates consistency with Section 6.1.2 of the MSHCP.

Section 6.1.3 NEPSSA Plants. The project site is located in a NEPSSA for San Diego ambrosia *(Ambrosia pumila)*, Brand's phacelia *(Phacelia stellaris)*, and San Miguel savory *(Clinopodium chandleri)*; therefore, a habitat assessment was conducted for these species. According to the *Analysis*, the project site lacks suitable habitat for Brand's phacelia (site lacks suitable coastal dunes and coastal scrub) and San Miguel savory (site lacks the rocky, metavolcanic soils necessary for this species). The *Analysis* states the only potentially suitable habitat for San Diego ambrosia within the project site occurs within the mulefat habitat (i.e., floodplain terrace), which is being avoided by the project. However, according to the *Analysis* the remainder of the project site lacks suitable habitat for San Diego ambrosia (lack of suitable chaparral, coastal sage scrub, valley and foothill grassland, and vernal pools) and furthermore, the project site lacks known associated soils such as Garreston and Las Posas soils. Therefore, given the lack of suitable habitat within the impact footprint for the project for San Diego ambrosia, San Miguel savory, and Brand's phacelia, focused surveys were not warranted.

Based on the information provided in the *Analysis*, the project demonstrates consistency with Section 6.1.3 of the MSHCP.

b. Section 6.3.2. Additional Survey Needs and Procedures. The following describes Additional Survey Needs and Procedures applicable to the proposed project:

Burrowing Owl. The project site is located within an Additional Survey Needs and Procedures Area for burrowing owl (*Athene cunicularia*). In accordance with the County of Riverside's Burrowing Owl Survey Instructions for the Western Riverside Multiple Species Habitat Conservation Plan Area (RCA 2006), a Step I *Habitat Assessment* and a Step II-A *Focused Burrow Survey* were conducted for the project site on May 26, 2022. According to the *Analysis*, the Step I *Habitat Assessment* determined the project site contains suitable burrowing owl habitat (i.e., area is relatively flat and composed of disturbed habitat); however, the Step II-A *Focused Burrow Survey* determined that project site lacks suitable burrowing owl burrows or burrow surrogates capable of supporting burrowing owls⁴; therefore, Step II-B *Focused Burrow Gowl Surveys* were not warranted.

<u>BURROWING OWL MEASURE</u>. Due to the presence of potentially suitable habitat, a 30-day preconstruction survey for burrowing owls is required prior to initial ground-disturbing activities (including vegetation clearing, clearing and grubbing, tree removal, site watering, equipment staging, grading, etc.) to ensure that no owls have colonized the site in the days or weeks preceding the ground-disturbing activities. If burrowing owls have colonized the project site prior to the initiation of ground-disturbing activities, the project proponent will immediately inform the Regional Conservation Authority (RCA) and the Wildlife Agencies, and will need to coordinate

⁴ The *Analysis* notes that ground squirrels (*Otospermophilus beecheyi*) were documented in the western portion project site adjacent to I-15; however, no suitable burrowing owl burrows were detected during the Step II-A *Focused Burrow Survey* effort.



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further with RCA and the Wildlife Agencies, including the possibility of preparing a Burrowing Owl Protection and Relocation Plan, prior to initiating ground disturbance. If ground-disturbing activities occur, but the site is left undisturbed for more than 30 days, a pre-construction survey will again be necessary to ensure burrowing owl has not colonized the site since it was last disturbed. If burrowing owl is found, the same coordination described above will be necessary.

Based on the information provided by in the *Analysis*, the project demonstrates consistency with Section 6.3.2 of the MSHCP.

c. Section 6.1.4. Urban/Wildlands Interface Guidelines. To preserve the integrity of areas adjacent to the project site which are proposed Conservation Areas, the guidelines contained in Section 6.1.4 related to controlling adverse effects for development adjacent to the MSHCP Conservation Area should be considered by the Permittee in their actions relative to the project. Therefore, the Permittee should include the following measures as project conditions of approval, as applicable:

SECTION 6.1.4 MEASURE.

- i. Incorporate measures to control the quantity and quality of runoff from the site entering the MSHCP Conservation Area. In particular, measures shall be put in place to avoid discharge of untreated surface runoff from developed and paved areas into MSHCP Conservation Areas. Best Management Practices (BMPs) will be implemented to prevent the release of toxins, chemicals, petroleum products, exotic plant materials, or other elements that might degrade or harm downstream biological resources or ecosystems.
- ii. Land uses proposed in proximity to the MSHCP Conservation Area that use chemicals or generate bioproducts, such as manure, that are potentially toxic or may adversely affect wildlife species, Habitat, or water quality shall incorporate measures to ensure that application of such chemicals does not result in discharge to the MSHCP Conservation Area. The greatest risk is from landscaping fertilization overspray and runoff.
- iii. Night lighting shall be shielded and directed downward and away from the MSHCP Conservation Area to protect species from direct night lighting. Post-project ambient light levels within the MSHCP Conservation Area shall not exceed that of pre-project conditions as a result of light spill from the Project site. A responsible party, such as a Home Owners Association, or other legally recognized entity, will be assigned prior to occupancy and will be responsible for maintaining the lighting in perpetuity. Any lighting issues will be addressed within 30 days of receiving input from the RCA.
- iv. Proposed noise-generating land uses affecting the MSHCP Conservation Area, including designated avoidance areas, shall incorporate setbacks, berms, or walls to minimize the effects of noise on MSHCP Conservation Area resources pursuant to applicable rules, regulations, and guidelines related to land use noise standards.



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- v. Avoid use of invasive, non-native plant species listed in Table 6-2 of the MSHCP in approving landscape plans for the portions of the project that are adjacent to the MSHCP Conservation Area, including avoidance areas. Considerations in reviewing the applicability of this list shall include proximity of planting areas to the MSHCP Conservation Areas and designated avoidance areas, species considered in the planting plans, resources being protected within the MSHCP Conservation Area and their relative sensitivity to invasion, and barriers to plant and seed dispersal, such as walls, topography, and other features.
- vi. Fencing shall be designed to prevent access to the MSHCP Conservation Area by unauthorized public access, domestic animals, and illegal trespass or dumping. This shall include, at a minimum, barriers with a minimum height of 6 feet with no greater than 2-inch openings (i.e., tubular steel fencing with tines set on 2-inch centers) and shall include a metallic or masonry component (i.e. wire mesh cloth) buried to a minimum depth of 12 inches below ground surface level to prevent domestic animals from gaining access to the MSHCP Conservation Area by digging under. This fencing shall be installed at the interface with the MSHCP Conservation Area, as well as other portions of the Project where access to the MSHCP Conservation Area could be achieved. A responsible party, such as a Homeowners Association, or other legally recognized entity, will be assigned prior to occupancy and will be responsible for maintaining the fencing in perpetuity. Any fencing issues will be fixed within 30 days of receiving input from the RCA.
- vii. Manufactured slopes associated with proposed site development shall not extend into the MSHCP Conservation Area.
- viii. Weed abatement and fuel modification activities are not permitted in the Conservation Area, including designated avoidance areas.
- c. **Appendix C**. The following best management practices (BMPs), as applicable, shall be implemented for the duration of construction:

APPENDIX C MEASURE.

- i. A condition shall be placed on grading permits requiring a qualified biologist to conduct a training session for project personnel prior to grading. The training shall include a description of the species of concern and its habitats, the general provisions of the Endangered Species Act (Act) and the MSHCP, the need to adhere to the provisions of the Act and the MSHCP, the penalties associated with violating the provisions of the Act, the general measures that are being implemented to conserve the species of concern as they relate to the project, and the access routes to and project site boundaries within which the project activities must be accomplished.
- ii. Water pollution and erosion control plans shall be developed and implemented in accordance with RWQCB requirements.



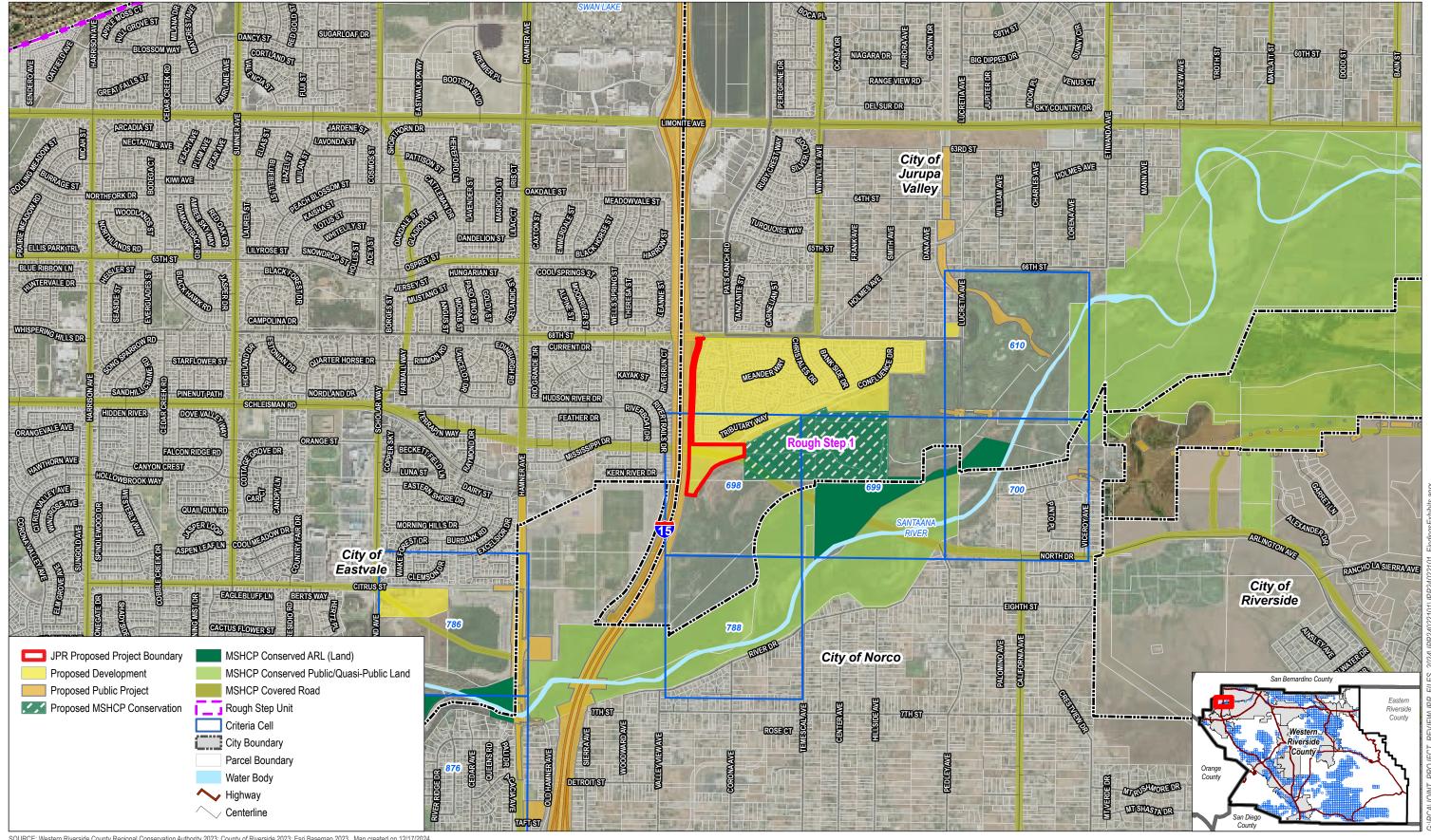
- iii. The footprint of disturbance shall be minimized to the maximum extent feasible. Access to sites shall be via pre-existing access routes to the greatest extent possible.
- iv. The upstream and downstream limits of projects disturbance plus lateral limits of disturbance on either side of the stream shall be clearly defined and marked in the field and reviewed by the biologist prior to initiation of work.
- v. Projects should be designed to avoid the placement of equipment and personnel within the stream channel or on sand and gravel bars, banks, and adjacent upland habitats used by target species of concern.
- vi. Projects that cannot be conducted without placing equipment or personnel in sensitive habitats should be timed to avoid the breeding season of riparian species identified in MSHCP Global Species Objective No. 7.
- vii. When stream flows must be diverted, the diversions shall be conducted using sandbags or other methods requiring minimal instream impacts. Silt fencing of other sediment trapping materials shall be installed at the downstream end of construction activity to minimize the transport of sediments off site. Settling ponds where sediment is collected shall be cleaned out in a manner that prevents the sediment from reentering the stream. Care shall be exercised when removing silt fences, as feasible, to prevent debris or sediment from returning to the stream.
- viii. Equipment storage, fueling, and staging areas shall be located on upland sites with minimal risks of direct drainage into riparian areas or other sensitive habitats. These designated areas shall be located in such a manner as to prevent any runoff from entering sensitive habitat. Necessary precautions shall be taken to prevent the release of cement or other toxic substances into surface waters. Project related spills of hazardous materials shall be reported to appropriate entities including but not limited to applicable jurisdictional city, FWS, and CDFG [CDFW], RWQCB and shall be cleaned up immediately and contaminated soils removed to approved disposal areas.
- ix. Erodible fill material shall not be deposited into water courses. Brush, loose soils, or other similar debris material shall not be stockpiled within the stream channel or on its banks.
- x. The qualified project biologist shall monitor construction activities for the duration of the project to ensure that practicable measures are being employed to avoid incidental disturbance of habitat and species of concern outside the project footprint.
- xi. The removal of native vegetation shall be avoided and minimized to the maximum extent practicable. Temporary impacts shall be returned to pre-existing contours and revegetated with appropriate native species.



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- xii. Exotic species that prey upon or displace target species of concern should be permanently removed from the site to the extent feasible.
- xiii. To avoid attracting predators of the species of concern, the project site shall be kept as clean of debris as possible. All food related trash items shall be enclosed in sealed containers and regularly removed from the site(s).
- xiv. Construction employees shall strictly limit their activities, vehicles, equipment, and construction materials to the proposed project footprint and designated staging areas and routes of travel. The construction area(s) shall be the minimal area necessary to complete the project and shall be specified in the construction plans. Construction limits will be fenced with orange snow screen. Exclusion fencing should be maintained until the completion of all construction activities. Employees shall be instructed that their activities are restricted to the construction areas.
- xv. The Permittee shall have the right to access and inspect any sites of approved projects including any restoration/enhancement area for compliance with project approval conditions, including these BMPs.

SG/TC



SOURCE: Western Riverside County Regional Conservation Authority 2023; County of Riverside 2023; Esri Basemap 2023. Map created on 12/17/2024.

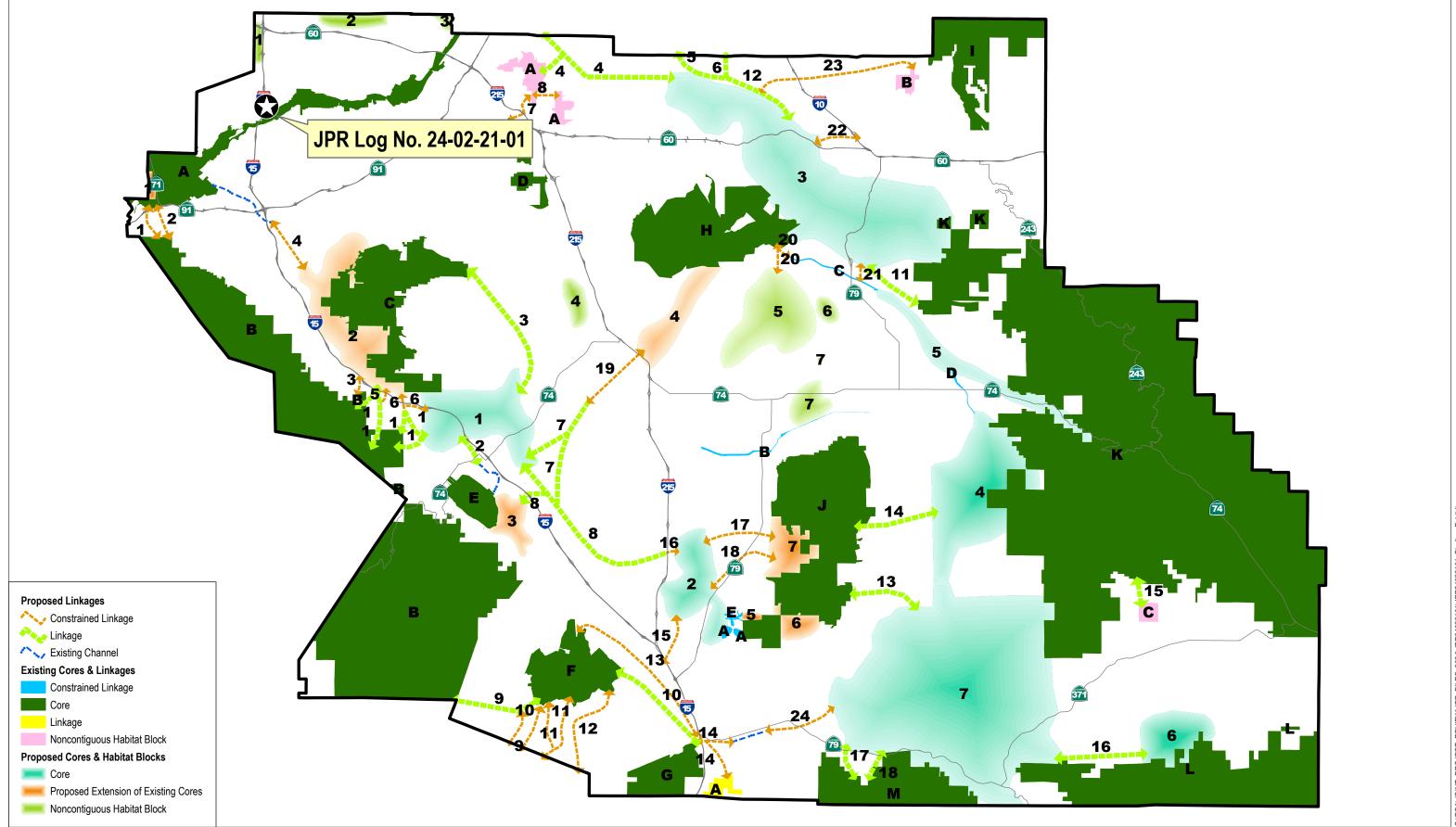
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EXHIBIT A JPR Log No. 24-02-21-01- Regional



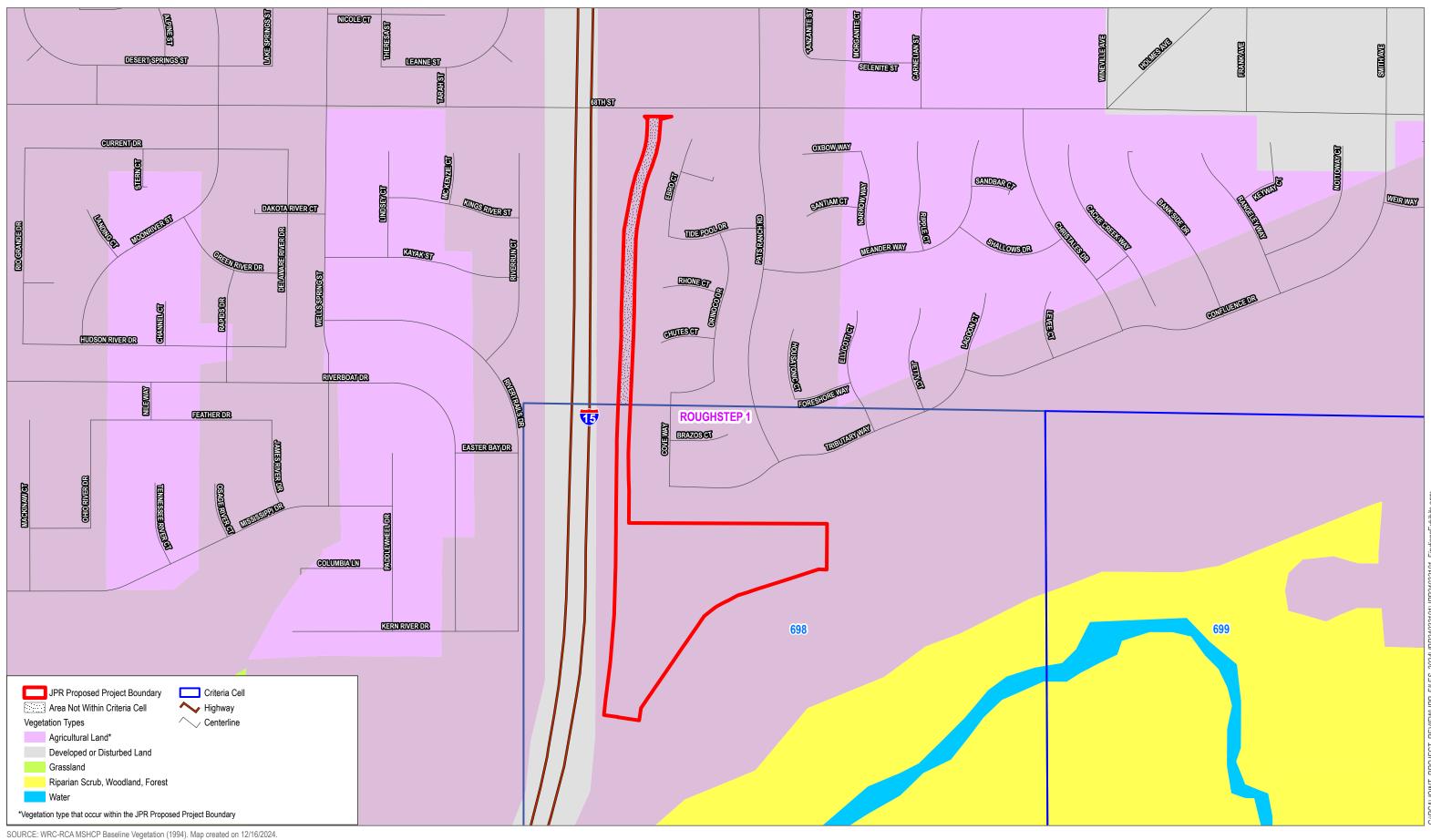
SOURCE: Western Riverside County Regional Conservation Authority (WRC-RCA). Map created on 5/9/2024



r14548 Permittee: City of Jurupa Valley MA20269 I-15 Self Storage



EXHIBIT B JPR Log No. 24-02-21-01- Vicinity Map with MSHCP Schematic Cores and Linkages



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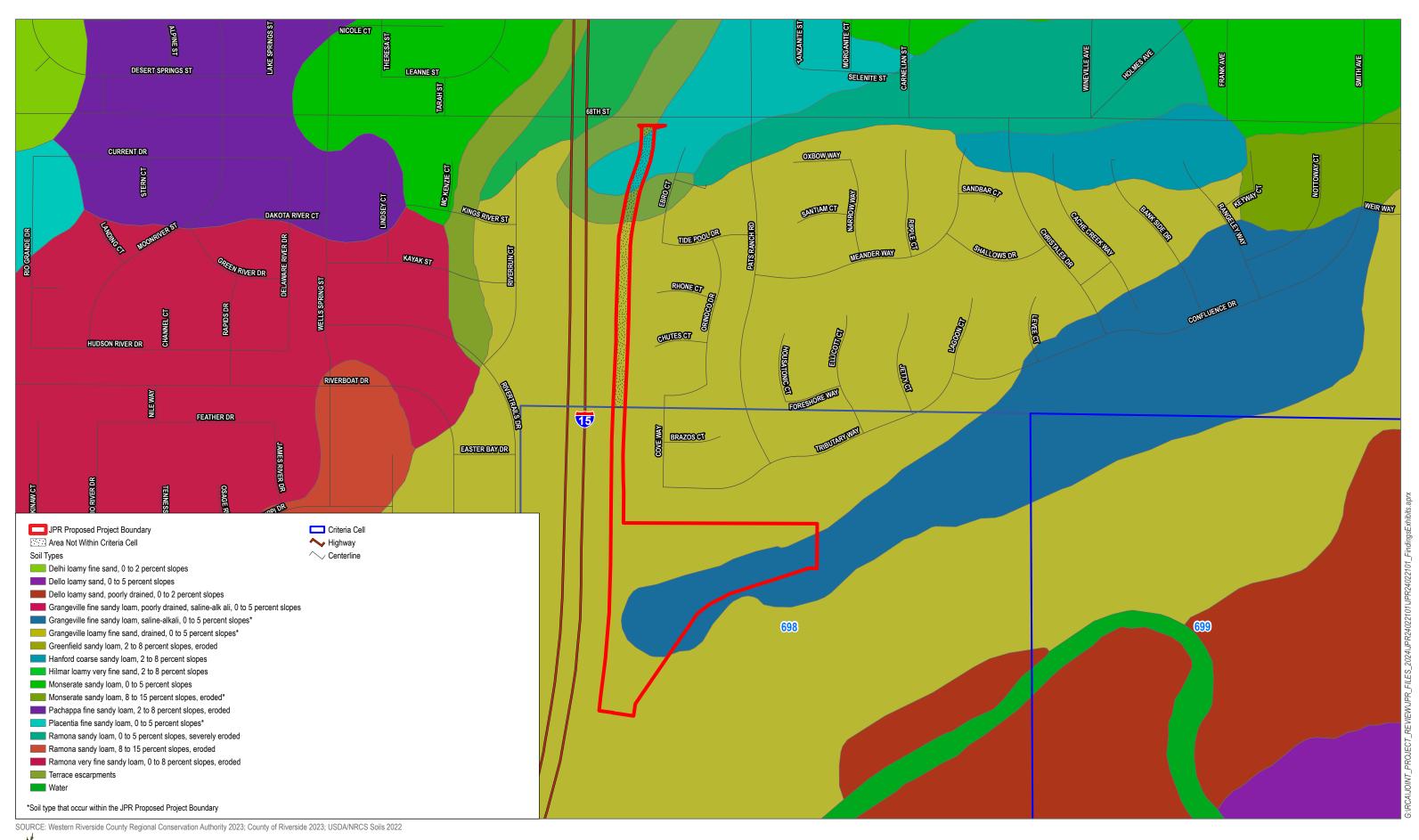
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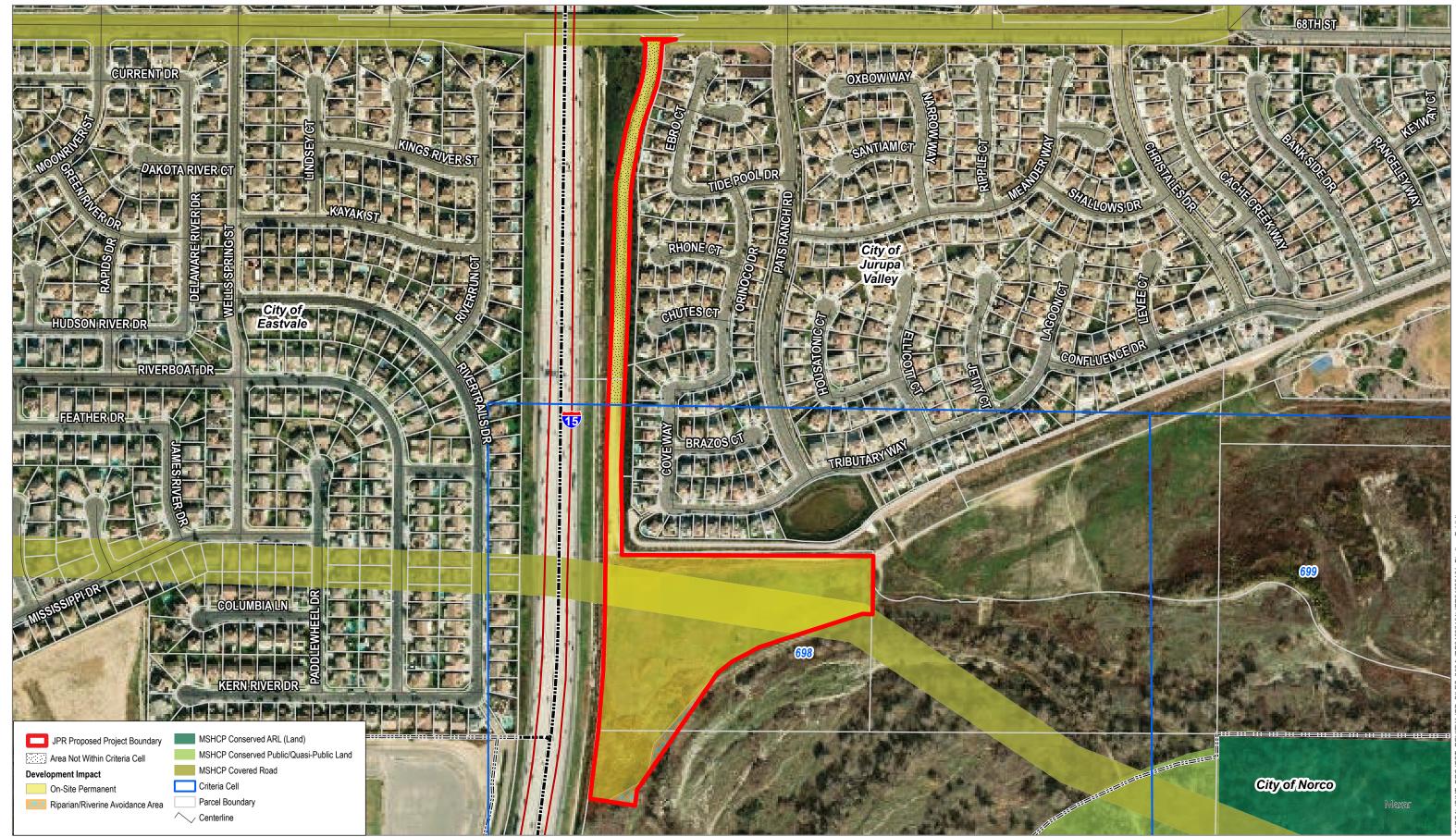
EXHIBIT C JPR Log No. 24-02-21-01- MSHCP 1994 Baseline Vegetation



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EXHIBIT D JPR Log No. 24-02-21-01- Soil



SOURCE: Western Riverside County Regional Conservation Authority 2023; County of Riverside 2023; Esri Basemap 2023. Map created on 12/16/2024.

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