

APPENDIX B

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Community Development Department

130 South Main Street
Lake Elsinore, CA 92530
(951) 674-3124
www.lake-elsinore.org

NOTICE OF PREPARATION

July 28, 2025

TO: Responsible Agencies, Trustee Agencies, and Interested Parties

FROM: City of Lake Elsinore, Community Development Department
130 South Main Street
Lake Elsinore, CA 92530

SUBJECT: Notice of Preparation of a Draft Environmental Impact Report for the City of Lake Elsinore General Plan Update, Zoning Code and Map Amendment, and Climate Action and Adaptation Plan

The City of Lake Elsinore (City) will be the Lead Agency and will prepare a Draft Environmental Impact Report (DEIR) pursuant to the California Environmental Quality Act (CEQA) for the proposed **Lake Elsinore General Plan Update (GPU), Zoning Code and Map Amendment (ZCA), and Climate Action and Adaptation Plan (CAAP)** (“project”). We are interested in your agency’s views as to the appropriate scope and content of the DEIR’s environmental information relevant to your agency’s statutory responsibilities related to the project. Please include the name of a contact person for your agency in your response. For interested individuals, we would like to be informed of environmental topics or issues that you believe should be included in the DEIR. The City has already determined that an EIR is required for the proposed project and, as permitted by CEQA Guidelines Section 15060(d) (Preliminary Review), the City will not prepare an Initial Study for the project. The proposed project, its location, and its probable environmental effects are described below. The City welcomes public input during the Notice of Preparation (NOP) review period. Due to the time limits mandated by the CEQA Guidelines, your written response must be sent not later than 30 days after your receipt of this notice. If no response is received by the end of the review period, the City will presume that you have no response.

NOP REVIEW PERIOD: Thursday July 31, 2025 to Tuesday September 2, 2025

Please send your comments to:

Damaris Abraham, Community Development Director
City of Lake Elsinore, Community Development Department
130 South Main Street
Lake Elsinore, CA 92530
(951) 674-3124
dabraham@lake-elsinore.org

Scoping Meeting:

Pursuant to CEQA Guidelines Section 15082(c) (Notice of Preparation and Determination of Scope of EIR), the City will conduct a scoping meeting for the purpose of soliciting comments of adjacent cities and counties, responsible agencies, trustee agencies, and interested parties requesting notice as to the appropriate scope and content of the Draft EIR.

The purpose of the meeting is to present the project and environmental topics in a public setting and provide an opportunity for the City to hear from the community and interested agencies on what potential environmental issues are important to them. The meeting will include a brief presentation of the proposed project, the EIR process, and the topics to be analyzed in the EIR. Following the presentation, interested agencies, organizations, and members of the public will be encouraged to offer their views concerning what environmental issues should be included in the DEIR.

The Public Scoping Meeting will be held on Wednesday, August 20, 2025, at 6:00 PM at the following location:

Cultural Center
183 N. Main Street
Lake Elsinore, CA 92530

To allow for mailing, receipt, and 30-day review of this NOP, the comment period closes at 5 PM on September 2, 2025.



Damaris Abraham, Comm. Dev. Director

July 28, 2025

Date

PROJECT TITLE: Lake Elsinore General Plan Update, Zoning Code and Map Amendment, and Climate Action and Adaptation Plan

APPLICANT: City of Lake Elsinore, Community Development Department

PROJECT LOCATION:

Located in southwest Riverside County, approximately 24 miles south of downtown Riverside, the City of Lake Elsinore is bordered by the City of Wildomar to the south and east, the City of Menifee to the East, the City of Canyon Lake to the east and north, and unincorporated portions of Riverside County to the north, west and south. The Planning Area encompasses all properties within the incorporated City limits, as well as unincorporated properties within the City's sphere of influence (see Figure 1).

PROJECT DESCRIPTION:

The DEIR will evaluate the General Plan Update (GPU), as well as associated zoning code and map amendments (ZCA), and a new Climate Action and Adaptation Plan (CAAP), which will facilitate the implementation of the General Plan Update.

The comprehensive update of the Lake Elsinore General Plan serves as the guide for the City's future growth and development over the course of the next 20 years (2025-2045). The General Plan contains goals, policies, and programs that provide City staff and decision makers with a foundation for decisions for long-range planning related to physical development and public services. The GPU also establishes the objectives listed below for long-term growth and community enhancement.

1. Lake Elsinore facilitates a healthy and diverse economy that retains and attracts traditional and new industries, creates jobs, supports the local tax base, and sustains the ability to provide important services for existing and future residents, including expanded housing opportunities.
2. Lake Elsinore encourages attractive neighborhood villages that provide residents with a diverse range of distinctive destinations, such as shopping areas, entertainment venues, dining experiences, and cultural spaces. These places may include small centers near established neighborhoods, more vibrant and dense centers in Downtown and Launch Pointe, and mixed-use villages along key corridors such as Lakeshore Drive or SR-74.
3. Lake Elsinore maintains and increases the variety of high quality open and recreational spaces. It embraces its "Dream Extreme" identity of extreme action sports, while also providing opportunities for locally scaled recreational opportunities, such as small neighborhood parks, plazas, and community centers.
4. Lake Elsinore fosters healthy communities for all residents by providing safe and convenient access to community services such as healthy food stores, health care, parks and open spaces, jobs, and educational opportunities.
5. Lake Elsinore values and is committed to enhancing the environmental health and economic vitality of the Lake. Lake Elsinore ensures that the Lake is well maintained, attractive, and provides residents and visitors with opportunities for lakeside interaction.
6. Lake Elsinore recognizes Downtown as its historic core with civic institutions, historic landmarks, and local businesses. The vitality of Downtown is supported by an increase in

appropriately scaled housing and people-oriented streetscapes.

7. Lake Elsinore offers attractive, convenient transportation options and provides walkable, bikeable, safer, and livable streets while continuing to strengthen access to the greater region. Community amenities are accessible by all residents.

General Plan Elements

The City of Lake Elsinore GPU succeeds the last comprehensive general plan adopted in 2011, with the Housing Element updated in 2022. The GPU incorporates statutory requirements for general plans and guidance provided in the 2023 General Plan Guidelines; coordinates future development and policies with regional planning efforts and serves as the city's fundamental guide in developing strategies to address greenhouse gas reduction, climate change, and climate planning. The DEIR analysis will consider each of the elements' goals, policies, and programs of the following chapters (or elements) in the General Plan Update:

- Land Use and Community Character Element
- Mobility and Infrastructure Element
- Housing Element (2021-2029)
- Conservation, Open Space, and Parks Element
- Public Safety, Noise, Air Quality Element
- Historical and Cultural Resources
- Environmental Justice Element

Zoning Code and Map Amendments

The ZCA is a revision to the City's zoning regulations and zoning map to implement the proposed General Plan. The revisions will include:

- reorganizing to facilitate clarity and ease of use;
- creating new land use zoning categories to implement General Plan land use policy, including Mixed Use and Medium High Density Residential;
- updating development standards, including parking, setbacks, signs, etc.;
- revising allowed uses in zoning districts, including removing required conditional use permits for certain uses to streamline approvals;
- updating nonconforming provisions;
- creating new procedures and processes to streamline development and implement General Plan direction, including creating a community benefits program; and
- updating standards and processes to reflect recent State legislation.

Climate Action and Adaptation Plan

The CAAP is a strategic policy framework that outlines how the City of Lake Elsinore will address climate change by reducing greenhouse gas emissions and prepare for climate change impacts. The CAAP implements the General Plan. In addition, the CAAP will include a baseline assessment of GHG emissions as well as the climate change hazards experienced in the city. Emissions will be forecasted for future years based on anticipated growth to assess trends and establish GHG reduction targets and strategies. Additionally, climate adaptation strategies will be developed to address climate hazards in the city. Contents of the CAAP will be informed by input from members

of the public and internal and external stakeholders. The range of strategies to be analyzed in the CAAP include:

- energy efficiency measures (improving building and transportation energy efficiency);
- renewable energy (transitioning to renewable energy sources such as solar, wind, etc.);
- sustainable transportation measures (promoting public transit, electric vehicles, active transportation infrastructure);
- waste reduction measures (reducing waste generation and increasing recycling and composting);
- water conservation measures;
- urban greening measures to enhance carbon sequestration and reduce extreme heat impacts);
- community resiliency (enhancing the ability of the community to withstand climate impacts); and
- infrastructure resiliency (strengthening infrastructure to withstand climate impacts).

Existing Conditions

The Planning Area comprises a total of 115 square miles within western Riverside County. The City of Lake Elsinore encompasses 43 square miles some of which is developed with urban land uses. The remaining 72 square miles are within the City's unincorporated Sphere of Influence and use City services and community facilities. Two freeways and highways provide regional access to the Planning Area. Interstate 15 (I-15), also known as the Corona Freeway, runs northwest/southeast through Lake Elsinore connecting with nearby Corona and Murrieta. Ortega Highway (State Route 74 or SR074) runs northeast/southwest connecting Lake Elsinore to Perris and Rancho Mission Viejo.

Lake Elsinore is served by regional transit, Riverside Transit Agency, which provides three routes to the City: Routes 8, 9, and 205/206. These routes may, as they stand, present a constraint in terms of attracting a larger audience of ridership, but also present an opportunity to partner with RTA to develop routes that may better serve the community.

The City of Lake Elsinore contains nearly 30,849 parcels encompassing almost 22,052.4 acres (excluding street rights-of-way). The Sphere of Influence adds an additional 17,971.9 acres to the Planning Area. Like many cities in the Inland Empire, large portions of Lake Elsinore are undeveloped, where 20 percent of land is vacant. Park and open space uses make up nearly one-third of the Planning Area (31.2 percent). Approximately 19 percent of the Planning Area is residential, the majority of which is single-family residential. Commercial, industrial, and agricultural/rural uses total 3.2 percent, 1.3 percent, and 23 percent, respectively.

Residential use makes up 19 percent (7,679 acres) of the Planning Area; residential uses are found throughout Lake Elsinore. Single-family (one unit) residential uses make up the bulk of the residential category (5,727 acres). Multi-family residential uses (more than one unit per development/lot) can also be found in various parts of the City. Senior housing and manufactured (mobile home) developments make up less than one percent of all uses.

Commercial areas in the incorporated areas make up 4.5 percent of all land uses (992 acres) and 1.6 percent in the Planning Area land uses. Most commercial uses are located along Central Avenue, Collier Avenue, Main Street, Riverside Drive, and Auto Center Drive. Commercial and office clusters are also found at major intersections. Most industrial land is located south of Collier Avenue near 3rd and Minthorn Streets and on Corydon Street/Ceral Street. Industrial uses comprise 505 acres and are primarily dedicated to light manufacturing and warehouse/distribution/storage.

Parks and open space comprise over 30 percent of the Planning Area land use acreage. Parks and open space areas include State and City parks, Bureau of Land Management lands, Cleveland National Forest, Links at Summerly Golf Course, Canyon Lake Golf and Country Club, Elsinore Valley Cemetery, and Pioneer Cemetery. Much of the Planning Area's open space is designated for conservation under the Multiple Species Habitat Conservation Plan (MSHCP).

Approximately two percent of the Planning Area's total land area is devoted to public facilities and institutional uses. The Public Facilities and Institutional land use primarily include educational facilities, emergency services, and religious institutions. The Public Facilities and Institutional land uses are generally found in and adjacent to low-density residential areas and in Lake Elsinore's civic hub, the Historic District. Some educational uses are also located near industrial and commercial uses in the Business District, such as Ortega High School.

Land used for agriculture and natural resource extraction is found throughout the Planning Area and makes up 23 percent of all land uses. Agricultural and natural resources extraction uses include raising of livestock and crop production, gravel pits and mineral resources extraction. Agriculture and natural resource extraction uses are mostly concentrated in the northern City and Sphere of Influence such as North Peak, Alberhill, Meadowbrook, and Northwest. Significant clay resources are associated with the Alberhill area in the north portion of the City and classified by the State Department of Conservation, Division of Mines and Geology. The mining activity is being phased out in accordance with the permits approved, and the continued use and ultimate reclamation of these lands has been or will be addressed in the specific plans prepared for these areas.

The Skylark Field Airport is in the East Lake District and totals 73 acres (less than one percent of the Planning Area's land use). It is privately owned/operated; Skylark Field Airport is home to Skydive Elsinore, one of Lake Elsinore's main recreational attractions.

Vacant land comprises 20 percent of the Planning Area (8,113 acres). Vacant properties are distributed throughout the Planning Area, many of which include steep slopes that impact development feasibility. Adopted specific plans call for the conversion of vacant land into mostly residential development or for the preservation of open space.

Proposed Land Use Plan

The proposed General Plan, if fully implemented, may result in:

Development Indicators	Existing (2025) Conditions			Future (2045) Conditions			Difference		
	City	SOI	Total	City	SOI	Total	City	SOI	Total
Dwelling Units	18,946 ¹	N/A	18,946	40,623	5,987	46,610	21,677	5,987	27,664
Population	70,435 ²	N/A	70,435	132,382	19,509	151,891	61,947	19,509	81,456
Non-Residential Building Square Feet ³	9.5M	0.8M	10.3M	21.2M	5.2M	26.4M	11.7M	4.4M	16.1M
Employees	33,800 ²	N/A	33,800	32,741	8,054	40,795	-1,059	8,054	6,995

Note:

M = Million; Non-Residential Building Square Feet rounded to nearest 100,000.

- 1 City of Lake Elsinore Housing Element 2024-2029
- 2 Zoom Prospector.com/communities/ca/city/Lake-Elsinore, 7.24.25
- 3 MIG, Urban Footprint 2025

Programmatic EIR

The City is the Lead Agency for preparation of a Program Environmental Impact Report (Program EIR) for the proposed project. The Program EIR will evaluate the environmental impacts resulting from implementation of the project and will recommend mitigation measures to avoid or reduce significant impacts, where applicable. The Program EIR also is intended to help the City review future project proposals pursuant to section 15168 (Program EIR) of the CEQA Guidelines. The following environmental topics listed below will be evaluated in the Draft Program EIR:

- **Aesthetics:** The EIR will describe the aesthetic implications of the proposed project, including its visual relationships to the surrounding vicinity and the potential impacts of development (the proposed array of building masses, heights, view corridors etc.) on important surrounding vantage points.
- **Agriculture and Forestry:** The EIR will explain why these CEQA-defined environmental topics will not be adversely affected by implementation of the project.
- **Air Quality:** The EIR will describe the potential impacts of the proposed project on local and regional air quality based on methodologies defined by the South Coast Air Quality Management District (SCAQMD). The project is likely to create significant impacts under this topic that may require mitigation and/or that may be significant and unavoidable. An air quality technical study will be included as part of the Draft program EIR to quantify and evaluate potential impacts.
- **Biological Resources:** The EIR will evaluate potential impacts on biological resources resulting from implementation of the proposed project.
- **Cultural and Tribal Cultural Resources:** The EIR will describe any potential impacts and mitigation needs associated with historic and cultural (archaeological) resources, including potential impacts on Tribal Cultural Resources.

- **Energy:** The EIR will evaluate the impacts of implementation of the project on energy resources and implementation of state and local plans for renewable energy and energy efficiency.
- **Geology and Soils:** The EIR will analyze the potential paleontological impacts associated with implementation of the proposed project.
- **Greenhouse Gas Emissions:** The EIR will describe the impacts of implementation of the proposed project on greenhouse gas emissions and global climate change, following the latest approach and methodologies recommended by State and regional agencies. The project is likely to create significant impacts under this topic that may require mitigation and/or that may be significant and unavoidable. A greenhouse gas (GHG) emissions technical study will be included as part of the draft program EIR to quantify and evaluate GHG emissions.
- **Hazards and Hazardous Materials:** The EIR will describe the potential for hazardous material use or hazardous waste investigation and cleanup activities anticipated in the Planning Area and will describe any associated potential impacts and mitigation needs, if applicable. Potential construction period hazards and hazardous material impacts and mitigation needs will also be described.
- **Hydrology and Water Quality:** The EIR will evaluate potential impacts on hydrology and water quality resulting from implementation of the proposed project, including possible effects related to drainage and flooding.
- **Land Use and Planning:** The EIR will describe the potential effects of implementation of the proposed project on existing and planned land use characteristics in the City, including the General Plan's relationship to other adopted regional and local plans.
- **Mineral Resources:** The EIR will evaluate whether the project will have any significant impact on existing mineral resources in the Planning Area.
- **Noise:** The EIR will describe potential construction and long-term operational noise (traffic, mechanical systems etc.) impacts and related mitigation needs where applicable. The project may create significant impacts under this topic that may require mitigation and/or that may be significant and unavoidable. A noise and vibration technical study will be included as part of the draft program EIR to quantify and evaluate noise generated from the project.
- **Population and Housing:** The EIR will describe the anticipated effects of the projected population growth and subsequent increase in housing. This information will be used to forecast public service and utility needs in the General Plan area.
- **Public Services:** The EIR will describe potential impacts on public services (police and fire protection parks and recreation, and schools).
- **Transportation and Circulation:** The EIR will describe the transportation and circulation implications of the proposed project, including the contribution of Vehicle Miles Traveled to local and regional roadways. The evaluation will include roadway system impacts, transit implications, and effects on pedestrian and bicycle circulation. General Plan components to improve multimodal travel will also be considered. The project may create

significant impacts under this topic that may require mitigation and/or that may be significant and unavoidable. A transportation technical study will be included as part of the draft program EIR to quantify and evaluate VMT from the project.

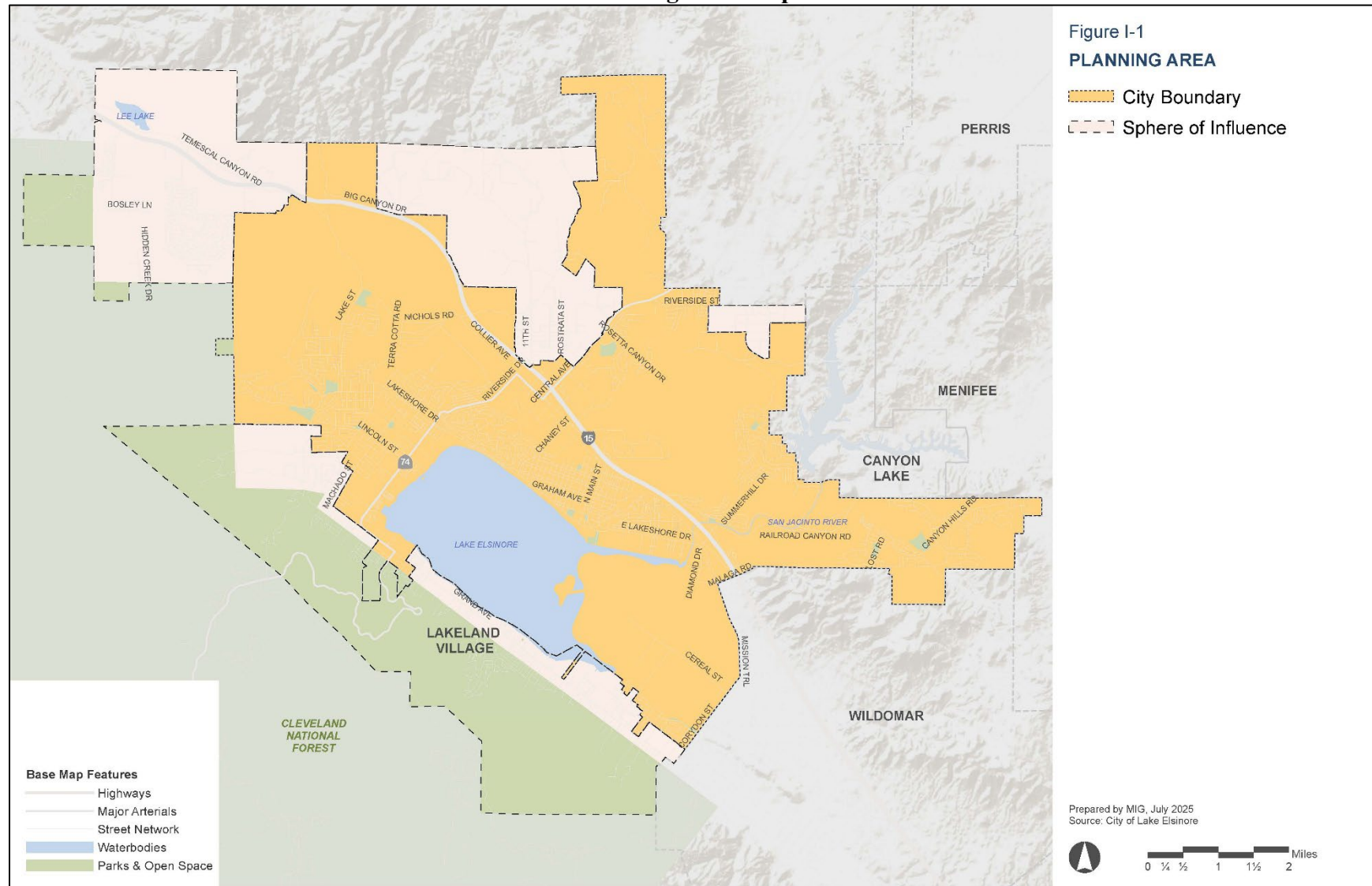
- **Utilities and Service Systems:** The EIR will describe the impacts of implementation of the proposed project on local utility and service systems, including water supply, water and wastewater treatment, and solid waste and recycling.
- **Wildfire:** The EIR will evaluate if the proposed project will have any significant impacts related to wildfire. Such impacts are considered to be high since Lake Elsinore is located in close proximity to Wildland/Urban interfaces.
- **Alternatives:** Pursuant to CEQA Guidelines Section 15126.6, the EIR will identify and compare a reasonable range of alternatives to the proposed project.

Required Approvals:

Implementation of the proposed project will require the following discretionary approvals by the City of Lake Elsinore City Council:

- Adoption of General Plan Update
- Adoption of Zoning Map and Code Amendment
- Adoption of Climate Action and Adaptation Plan
- Certification of Final Environmental Impact Report
- Adoption of a Mitigation Monitoring and Reporting Program

Figure 1
Planning Area Map





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



August 29, 2025
Sent via email

Damaris Abraham, Community Development Director
City of Lake Elsinore Community Development Department
130 South Main Street
Lake Elsinore, CA 92530
dabraham@lake-elsinore.org

Subject: Notice of Preparation of a Draft Environmental Impact Report
Lake Elsinore General Plan Update, Zoning Code and Map Amendment,
and Climate Action and Adaptation Plan
State Clearinghouse No. 2025080060

Dear Damaris Abraham:

The California Department of Fish and Wildlife (CDFW) received a Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) from the City of Lake Elsinore Community Development Department (City) for the Lake Elsinore General Plan Update, Zoning Code and Map Amendment, and Climate Action and Adaptation Plan (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 DESCRIPTION SUMMARY

The proposed Project includes a comprehensive General Plan Update, associated Zoning Map and Zoning Text Amendments, and a Climate Action and Adaptation Plan. The 2045 planning horizon for the Planning Area is estimated to result in increases of approximately 27,664 dwelling units and 16.1 million square feet of non-residential building area when compared to existing conditions.

The City of Lake Elsinore contains nearly 30,849 parcels encompassing almost 22,052.4 acres (excluding street rights-of-way). The Planning Area comprises a total of 115 square miles within western Riverside that encompasses all properties within the incorporated City limits, as well as unincorporated properties within the City's sphere of influence. The Sphere of Influence adds an additional 17,971.9 acres to the Planning Area.

The City of Lake Elsinore is located in southwest Riverside County and is bordered by the City of Wildomar to the south and east, the City of Menifee to the East, the City of Canyon Lake to the east and north, and unincorporated portions of Riverside County to the north, west and south.

The Project is city wide, and covers multiple Criteria Cells and their associated Cell Groups and subunits of the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP).

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist the City 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 recognizes that the general plan EIR need not be as detailed as CEQA documents prepared for specific projects that may follow (CEQA Guidelines § 15146). CDFW also recognizes that the level of detail should be reflective of the level contained in the plan or plan element being considered (*Rio Vista Farm Bureau Center v. County of Solano* (1992) 5 Cal.App.4th 351). However, please note that the City cannot defer the analysis of significant effects of the general plan to later-tiered CEQA documents (*Stanislaus Natural Heritage Project v. County of Stanislaus* (1996) 48 Cal.App.4th 182).

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

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/>

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 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.

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>)

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 (including the plan's land use designations, policies and programs). 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 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]). The no-Project alternative should evaluate how the changing environment, such as climate change and drought,

may affect the community if a new or revised general plan were not adopted.

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 the Elsinore Plan Area (pages 3-133 to 3-166 of the MSHCP) and its six associated subunits (Estelle Mountain/Indian Canyon, Alberhill, Elsinore, Sedco Hills, Ramsgate, and Steele Park). These objectives include, but are not limited to: maintaining Core and Linkage Habitat for mountain lion, bobcat, Stephen's kangaroo rat, Quino checkerspot butterfly, Western pond turtle, and Riverside fairy shrimp; conserving wetlands including Temescal Wash, Collier Marsh, Alberhill Creek, Lake Elsinore and the floodplain east of Lake Elsinore (including marsh Habitats), lower San Jacinto River, and Wasson Creek; conserving clay soils supporting sensitive plants such as Munz's onion, many-stemmed dudleya, small-flowered morning glory and Palmer's grappling hook; and conserving foraging Habitat for raptors, providing a sage scrub-grassland ecotone.

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 Lead Agency 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 (with the exception of certain projects set forth in SB 147, which was passed on July 10, 2023). 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: California glossy snake, loggerhead shrike, Los Angeles pocket mouse, red-diamond rattlesnake, and western mastiff bat.
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.

Crotch's Bumble Bee

The California Fish and Game Commission accepted a petition to list Crotch's bumble bee as endangered under CESA, determining the listing "may be warranted" and advancing the species to the candidacy stage of the CESA listing process. Crotch's bumble bee is granted full protection of a threatened species under CESA. Take of any endangered, threatened, candidate species that results from the Project is prohibited, except as authorized by State law (Fish & G. Code, §§ 86, 2062, 2067, 2068, 2080, 2085; Cal. Code Regs., tit. 14, § 786.9). In addition, Crotch's bumble bee has a State ranking of S1/S2. This means that the Crotch's bumble bee is considered critically imperiled or imperiled and is extremely rare (often five or fewer populations). Crotch's bumble bee is also listed as an invertebrate of conservation priority under the [Terrestrial and Vernal Pool Invertebrates of Conservation Priority](#) (CDFW 2017).

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 City 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 City 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. Amending the Zoning Areas within Criteria Cells have potential to impact that lands that come into conservation by increasing the cost and cause harm to the MSHCP reserve design and implementation of the MSHCP. Thus, the DEIR should include an analysis that would identify if the zone changes within the new general plan update would have a significant impact on the MSHCP Conservation Area assembly.

The Project is located within the MSHCP Criteria Area and therefore, pursuant to the Implementing Agreement public and private projects are expected to be designed and implemented in accordance with the Criteria for each Area Plan and all other MSHCP requirements as set forth in the MSHCP and in Section 13.0 of the Implementing Agreement. Section 13.2 of the Implementing Agreement identifies that City obligations under the MSHCP and the Implementing Agreement include, but are not limited to: the amendment of general plans as appropriate, to implement the requirements and to fulfill the purposes of the Permits, the MSHCP, and the Implementing Agreement for private and public development projects (including siting, construction, design, operation and maintenance guidelines as set forth in Section 7.0 and Appendix C of the MSHCP); and taking all necessary and appropriate actions, following applicable land use permit enforcement procedures and practices, to enforce the terms of the project approvals for public and private projects, including compliance with the MSHCP, the Permits, and the Implementing Agreement. The City is also obligated to notify the Western Riverside County Regional Conservation Authority (RCA), through the Joint Project/Acquisition Review Process (JPR) set forth in Section 6.6.2 of the MSHCP or proposed discretionary Projects within the Criteria Area and participate in any further requirements imposed by MSHCP Section 6.6.2.

The City is also obligated to notify the Western Riverside County Regional Conservation Authority (RCA), through the Joint Project/Acquisition Review Process (JPR) set forth in

Section 6.6.2 of the MSHCP or proposed discretionary Projects within the Criteria Area and participate in any further requirements imposed by MSHCP Section 6.6.2.

To examine how the Project might contribute to, or conflict with, assembly of the MSHCP Conservation Area consistent with the reserve configuration requirements, CDFW recommends that the DEIR identify the specific Area Plan and Area Plan Subunit within which the Project is located, and the associated Planning Species and Biological Issues and Considerations that may apply to the Project, further discussed below. The DEIR should also discuss the specific Criteria for Cells within which the Project is located and identify the associated Core(s) and/or Linkage(s) (Proposed Linkages 1, 2, 3, 7, and 8; Proposed Constrained Linkages 5 and 6; Proposed Core 1; and Proposed Extension of Existing Cores 2 and 3). Next, the DEIR should identify the vegetation communities toward which conservation should be directed along with the connectivity requirements. Finally, the DEIR should examine the Project with respect to the percentage conservation portion within all Criteria Cells citywide.

Covered Activities

CDFW also recommends that the City demonstrate how the Project is consistent with Covered Activities/Allowable Uses (Section 7.0) of the MSHCP.

Roads

For projects proposed inside the MSHCP Criteria Area, the DEIR should include a discussion of the Project and its consistency with Covered Activities (Section 7.3 of the MSHCP) and specifically Existing Roads Within the Criteria Area (Section 7.3.4) and Planned Roads Within the Criteria Area (7.3.5). Where maintenance of existing roads within the Criteria Area is proposed, CDFW recommends that the Lead Agency reference MSHCP Section 7.3.4 and Table 7-3, which provides a summary of the existing roads permitted to remain in the MSHCP Criteria Area. Planned roads within the MSHCP Criteria Area are discussed in MSHCP Section 7.3.5 and identified on Figure 7-1. Please note that roadways other than those identified in Section 7.3.5 of the MSHCP are not covered without an amendment to the MSHCP in accordance with the procedures described in MSHCP Section 6.10. CDFW recommends that the City review MSHCP Section 7.3.5 and include in the DEIR information that demonstrates that Project-related roads are MSHCP covered activities. The DEIR should also discuss design and siting information for all proposed roads to ensure that the roads are sited, designed, and constructed in a manner consistent with MSHCP conservation objectives.

Allowable Uses in MSHCP Conservation Areas - Trails

CDFW recommends that the DEIR also include a discussion of the Project and MSHCP Allowable Uses (Section 7.4) and Conditionally Compatible Uses (Section 7.4.2) in MSHCP Conservation Area such as trails. For example, if trails are proposed as part of the Project, the DEIR should discuss whether the trail is identified on Figure 7-4, and

provide details regarding trail construction (siting and design), and operations and maintenance that demonstrate that the proposed trail is consistent with MSHCP Section 7.4.

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.).

Damaris Abraham, Community Development Director
City of Lake Elsinore Community Development Department
August 29, 2025
Page 14 of 14

CONCLUSION

CDFW appreciates the opportunity to comment on the NOP of a DEIR for the Lake Elsinore General Plan Update, Zoning Code and Map Amendment, and Climate Action and Adaptation Plan Project (SCH No. 2025080060) and recommends that the City address the CDFW's comments and concerns in the forthcoming DEIR. Questions regarding this letter or further coordination should be directed to Alta Vasquez, Scientific Aid, at alta.vasquez@wildlife.ca.gov.

Sincerely,

DocuSigned by:

84F92FFEEFD24C8...

Kim Freeburn
Environmental Program Manager

ec:

Carly Beck, Senior Environmental Scientist Supervisor
Inland Deserts Region
Carly.Beck@wildlife.ca.gov

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

Harry Sandoval (Western Riverside County Regional Conservation Authority)
Director of Reserve Management and Monitoring
hsandoval@rctc.org

Dan Silver <dsilverla@me.com>
to Damaris Abraham

Tue, Aug 5, 9:38 AM

Message from external sender. Use Caution.

August 5, 2025

Damaris Abraham, Community Development Director
City of Lake Elsinore, Community Development Department
130 South Main Street
Lake Elsinore, CA 92530

RE: NOP for General Plan Update and Climate Action Plan

Dear Mr Abraham:

Endangered Habitats League (EHL) is in receipt of the NOP for a DEIR for this project. Please retain EHL on notification and distribution lists, such as CEQA documents and public hearings. Please note our new mailing address below, but electronic notification is also fine.

EHL urges that the Multiple Species Habitat Conservation Plan (MSHCP) be fully incorporated into the Conservation, Open Space, and Parks Element, the Land Use and Community Character Element, and the Mobility and Infrastructure Element. The MSHCP and its programmatic EIR provide permit streamlining under CEQA and the state and federal Endangered Species Acts. MSHCP compliance thus economically benefits the City's housing and infrastructure at the same time as it increases its quality of life through natural open space. Compatible recreational use is an additional benefit. EHL commends the City for its progress in preserve assembly to date.

EHL also urges a focus on infill and efficient use of land, particularly multifamily housing that addresses affordability needs.

The Climate Action Plan should focus on energy efficiency, solar installation, and other on-site measures, and avoid "carbon offsets" which are problematic in terms of accountability and real, additional carbon reductions.

Thank you for your consideration,
Dan Silver

NOTE NEW MAILING ADDRESS

Dan Silver, Executive Director
Endangered Habitats League
505 S Flower St #71001
PO Box 71001

Los Angeles CA 90071

213-804-2750

dsilverla@me.com

<https://ehleague.org>

Damaris Abraham

Mon, Sep 1, 3:35 PM (8 days ago)

to Lisa, me, Cameron

FYI

From: Kim & Dave McElroy <kimdav138@gmail.com>

Sent: Monday, September 1, 2025 1:14 PM

To: Damaris Abraham <dabraham@lake-elsinore.org>

Cc: Lynda Fujino <lyndaclaire@ca.rr.com>; Hermann Dreier <hdreier48@gmail.com>; kimdav138@gmail.com; Nancy Hunzeker <nancyhunzeker@gmail.com>; hohenadl@verizon.net; Rose Wurtz <enmsinc1@verizon.net>; Sarah Bennett <sarah@opheliatheatre.org>; Jason Simpson <jsimpson@Lake-Elsinore.org>; Kathryn Vigil <kvigil@Lake-Elsinore.org>

Subject: [External]Response to Notice of Preparation of a Draft EIR for City of Lake Elsinore General Plan Update

Message from external sender. Use Caution.

Dear Mr. Abraham,

The Lake Elsinore Historical Society appreciates the information provided in your letter of July 28, 2025. Lake Elsinore has worked closely with our organization and has increased their efforts to keep us informed of any possible changes to our historic homes and neighborhoods. We are pleased that in the preparation of the next General Plan the city continues to address the preservation of historical and cultural resources. It shows great foresight to include this goal given the rich history this area has dating back 10,000 years. We would also obviously want it noted that continued adherence to the Historic Preservation Ordinance is critical to this end.

Thank you for the opportunity to provide our input into this process. If we can be of any further assistance please contact us.

Sincerely,

Kim

Kimberly G. McElroy
President
Lake Elsinore Historical Society and Museum
183 N. Main Street
Mailing address: P.O. Box 84
Lake Elsinore, CA 92531
Cell Phone: 949-282-8193

FW: [External]General Plan Update, Zoning Code and Map Amendment, and Climate Action and Adaptation Plan-Due 9/2/2025

Inbox



Damaris Abraham

to me, Cameron, Lisa

Aug 20, 2025, 12:57 PM

FYI

From: McKinney, Elsa <EMcKinne@rivco.org>

Sent: Wednesday, August 20, 2025 10:55 AM

To: Damaris Abraham <dabraham@lake-elsinore.org>

Cc: McNeill, Amy <ammcneil@RIVCO.ORG>; Cornelius, William <wmcornel@RIVCO.ORG>

Subject: [External]General Plan Update, Zoning Code and Map Amendment, and Climate Action and Adaptation Plan-Due 9/2/2025

Message from external sender. Use Caution.

Hello Damaris,

Thank you for the opportunity to comment, however since this proposal is not a project with proposed construction, Riverside County Flood Control and Water Conservation District has no comments at this time. When the future projects come in, the District will review and provide any applicable comments.

Please note, land use changes that result in higher densities and thus increased impervious surfaces may impact the capacity of existing drainage facilities and require additional mitigation on site.

Cordially,

Elsa McKinney

Engineering Tech I, Development Review

[Riverside County Flood Control & Water Conservation District](#)

emckinne@rivco.org

1995 Market Street, Riverside, CA 92501

951.955.2878

*Off on Mondays

Confidentiality Disclaimer

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[County of Riverside California](#)

FW: [External]Update Request for Mailing Address – City of Lake Elsinore NOP

Inbox



Damaris Abraham

to me, Cameron, Lisa

Wed, Aug 6, 1:43 PM

FYI

From: Natalia Gonzalez <ngonzalez@sawpa.gov>

Sent: Wednesday, August 6, 2025 1:18 PM

To: Damaris Abraham <dabraham@lake-elsinore.org>

Subject: [External]Update Request for Mailing Address – City of Lake Elsinore NOP

Message from external sender. Use Caution.

Hello,

We received your certified mail regarding the City of Lake Elsinore NOP.

We would like to request an update to your mailing list for all future correspondence. Please send all future communications to the following updated contacts:

Santa Ana Watershed Project Authority (SAWPA)

Attn: Karen Williams, Interim General Manager

Lake Elsinore & San Jacinto Watersheds Authority (LESJWA)

Attn: Rick Whetsel, Authority Administrator

Please let us know if you need any additional information to process this update.

Thank you for your attention to this matter.

Natalia Gonzalez

Administrative Assistant II

Santa Ana Watershed Project Authority

11615 Sterling Avenue, Riverside, CA 92503

ngonzalez@sawpa.gov

(951) 354-4226

...

[Message clipped] [View entire message](#)



NATIVE AMERICAN HERITAGE COMMISSION

August 12, 2025

Damaris Abraham
City of Lake Elsinore
130 South Main Street
Lake Elsinore CA 94063

CHAIRPERSON
Reginald Pagaling
Chumash

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Bennae Calac
Pauma-Yuima Band of
Luiseño Indians

COMMISSIONER
Vacant

COMMISSIONER
Vacant

ACTING EXECUTIVE
SECRETARY
Michelle Carr

NAHC HEADQUARTERS
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov

**Re 2025080060 The City of Lake Elsinore General Plan Update, Zoning Code and Map
Amendment, and Climate Action and Adaptation Plan Project Riverside County**

Dear Ms. Abraham:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, §15064.5 (b) (CEQA Guidelines §15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

- 1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project:** Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:

 - a. A brief description of the project.
 - b. The lead agency contact information.
 - c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
 - d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).
- 2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report:** A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).

 - a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).
- 3. Mandatory Topics of Consultation If Requested by a Tribe:** The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

 - a. Alternatives to the project.
 - b. Recommended mitigation measures.
 - c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).
- 4. Discretionary Topics of Consultation:** The following topics are discretionary topics of consultation:

 - a. Type of environmental review necessary.
 - b. Significance of the tribal cultural resources.
 - c. Significance of the project's impacts on tribal cultural resources.
 - d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).
- 5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process:** With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).
- 6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document:** If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:

 - a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
 - b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

- 7. Conclusion of Consultation:** Consultation with a tribe shall be considered concluded when either of the following occurs:
- The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
 - A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).
- 8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document:** Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).
- 9. Required Consideration of Feasible Mitigation:** If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).
- 10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:**
- Avoidance and preservation of the resources in place, including, but not limited to:
 - Planning and construction to avoid the resources and protect the cultural and natural context.
 - Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
 - Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - Protecting the cultural character and integrity of the resource.
 - Protecting the traditional use of the resource.
 - Protecting the confidentiality of the resource.
 - Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
 - Protecting the resource. (Pub. Resource Code §21084.3 (b)).
 - Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
 - Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).
- 11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource:** An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
- The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
 - The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
 - The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf.

Some of SB 18's provisions include:

1. **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation.** There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation:** Consultation should be concluded at the point in which:
 - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>.

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (https://ohp.parks.ca.gov/?page_id=30331) for an archaeological records search. The records search will determine:
 - a. If part or all of the APE has been previously surveyed for cultural resources.
 - b. If any known cultural resources have already been recorded on or adjacent to the APE.
 - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
 - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
 - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:

- a.** A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
- b.** A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.

4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.

- a.** Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, § 15064.5(f) (CEQA Guidelines § 15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
- b.** Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
- c.** Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code § 7050.5, Public Resources Code § 5097.98, and Cal. Code Regs., tit. 14, § 15064.5, subdivisions (d) and (e) (CEQA Guidelines § 15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address:

Andrew.Green@NAHC.ca.gov.

Sincerely,

Andrew Green

Andrew Green
Cultural Resources Analyst

cc: State Clearinghouse

SENT VIA EMAIL ONLY

dabraham@lake-elsinore.org

August 29, 2025

Damaris Abraham, Community Development Director
City of Lake Elsinore, Community Development Department
130 South Main Street
Lake Elsinore, CA 92530

RE: Notice of Preparation (NOP) of the Draft Environmental Impact Report (DEIR) for Lake Elsinore City Updates on the General Plan (GPU), Zoning Code & Map Amendment (ZCA), and Climate Action & Adaptation Plan (CAAP).

Dear Damaris Abraham,

The Riverside County Department of Waste Resources (RCDWR) has reviewed the NOP of the Environmental Impact Report (EIR) for the proposed General plan update for the city of Lake Elsinore. The DEIR will evaluate the General Plan Update (GPU), as well as associated zoning code and map amendments (ZCA), and a new Climate Action and Adaptation Plan (CAAP), which will facilitate the implementation of the General Plan Update. Located in southwest Riverside County, approximately 24 miles south of downtown Riverside, the City of Lake Elsinore is bordered by the City of Wildomar to the south and east, the City of Menifee to the East, the City of Canyon Lake to the east and north, and unincorporated portions of Riverside County to the north, west and south. This location includes Riverside County's Elsinore landfill that was closed in 1986.

The RCDWR offers the following comments for consideration while preparing the Project's EIR:

1. Construction of future development 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 potential waste impacts, the EIR 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 anticipated solid waste impacts:
 - a) Solid waste generated within the Project area is collected by CR&R Inc. (CR&R), with the bulk of recyclable waste and green waste delivered to the Perris Transfer Station for processing. The facility is located at 1706 Goetz Road in the city of Perris.

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

- 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 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 2024 Annual Report, the landfill had a remaining in-County disposal capacity of approximately 46.1 million tons.² In 2024, the El Sobrante Landfill accepted a daily average of 10,557 tons with a period total of approximately 3,251,611 tons. The landfill is expected to reach capacity in approximately 2059.

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, 2025 (beginning of day), the landfill has a total remaining capacity of approximately 6.1 million tons.⁴ The current landfill remaining disposal capacity is estimated to last, at a minimum, until approximately 2032.⁵ From January 2024 to December 2024, the Lamb Canyon Landfill accepted a daily average of 1,973 tons with a period total of approximately 607,583 tons. Landfill expansion potential exists at the Lamb Canyon Landfill site.

² 2024 El Sobrante Landfill Annual Report- Based on 115,286,220 tons remaining capacity (40% for in-county waste).

³ GASB 18_ 2024 – Engineering Estimate for total landfill capacity

⁴ GASB 18 2024 & SiteInfo

⁵ SWFP # 33-AA-0007

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 disturbance area of 278 acres, of which 150 acres are for refuse disposal. Landfill expansion potential exists at the Badlands Landfill site. Under the 2022 Solid Waste Facility Permit (SWFP), the permitted disturbance area increases from 278 acres to 811 acres, and the refuse disposal area increases from 150 acres to 409 (in multiple stages). The landfill is currently permitted to receive 5,000 tpd of MSW for disposal and 300 tpd for beneficial reuse. The site has an estimated total capacity of approximately 68.6 million tons.⁶ As of January 1, 2025 (beginning of day), the landfill had a total remaining disposal capacity of approximately 48.9 million tons.⁷ Under the 2022 SWFP, the landfill would have a remaining disposal capacity estimated to last, at a minimum, until approximately 2059.⁸ From January 2024 to December 2024, the Badlands Landfill accepted a daily average of 3,003 tons with a period total of approximately 924,862 tons.

3. Additionally, you may wish to consider incorporating the following measures to help 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

⁶ SWFP # 33-AA-0006

⁷ GASB_18_2024 & SiteInfo

⁸ SWFP # 33-AA-0006

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

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, 2022.¹⁰ This law establishes methane emissions reduction targets in a statewide effort to reduce emissions of short-lived climate pollutants caused by organics waste disposal.

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 alimitchell@rivco.org if you have any questions regarding the above comments.

Sincerely,

Aliah Mitchell

Aliah Mitchell
Assistant Planner

Cc: Kinika Hesterly, RCDWR

DM# 361010

¹⁰ S.B 1383, Chapter 395, 2015-2016 Lara, (Cal. 2016).



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Transportation Commission**

August 29, 2025

Damaris Abraham
Community Development Department
130 South Main Street
Lake Elsinore, CA 92530
Phone: (951) 674-3124
E-mail: dabraham@lake-elsinore.org

Subject: SCAG Comments on the Notice of Preparation of a Draft Environmental Impact Report for the City of Lake Elsinore General Plan Update, Zoning Code and Map Amendment, and Climate Action and Adaptation Plan [SCAG NO. IGR11229]

Dear Damaris:

Thank you for submitting the Notice of Preparation of a Draft Environmental Impact Report for the City of Lake Elsinore General Plan Update, Zoning Code and Map Amendment, and Climate Action and Adaptation Plan ("proposed project") to the Southern California Association of Governments (SCAG) for review. SCAG is responsible for providing informational resources to regionally significant plans, projects, and programs per the California Environmental Quality Act (CEQA) to facilitate the consistency of these projects with SCAG's adopted regional plans, to be determined by the lead agencies.¹

Pursuant to Senate Bill (SB) 375, SCAG is the designated Regional Transportation Planning Agency under state law and is responsible for preparation of the Regional Transportation Plan (RTP), including the Sustainable Communities Strategy (SCS). SCAG's feedback is intended to assist local jurisdictions and project proponents to implement projects that have the potential to contribute to attainment of and alignment with adopted Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) goals and policies. Finally, SCAG is the authorized regional agency for Intergovernmental Review (IGR) of programs proposed for Federal financial assistance and direct Federal development activities, pursuant to Presidential Executive Order 12372.

SCAG staff has reviewed the Notice of Preparation of a Draft Environmental Impact Report for the proposed project. The proposed project includes a General Plan update resulting in up to 27,664 dwelling units and 16.1 million non-residential building square feet on 115 square miles. **When available, please email environmental documentation to IGR@scag.ca.gov providing, at a minimum, the full public comment period for review.**

If you have any questions regarding the attached comments, please contact the IGR Program, attn.: Ryan Bañuelos, Senior Regional Planner, at (213) 630-1532 or IGR@scag.ca.gov. Thank you.

Sincerely,

Lijin Sun

Lijin Sun
Planning Supervisor, Planning Strategy Department

¹ Local jurisdictions and other lead agencies shall have the sole discretion to determine a local project's or plan's consistency and/or alignment with Connect SoCal 2024 for the purpose of determining consistency for CEQA purposes.

**COMMENTS ON THE NOTICE OF PREPARATION OF A
DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE CITY OF LAKE ELSINORE GENERAL PLAN UPDATE, ZONING
CODE AND MAP AMENDMENT, AND CLIMATE ACTION AND ADAPTATION PLAN [SCAG NO. IGR11229]**

CONNECT SoCal 2024

Connect SoCal 2024 (Plan) is a long-range visioning plan for the six-county SCAG region, reflecting a continuation of the shift towards more efficient resource management including transportation infrastructure resources, land resources and environmental resources. The Plan highlights the existing land use and transportation conditions throughout the SCAG region and forecasts the region's evolving transportation needs between 2024 and 2050. The Plan identifies and prioritizes expenditures of the anticipated funding for transportation projects of all transportation modes: highways, streets and roads, transit, rail, bicycle, and pedestrian, as well as aviation ground access.

The Plan was developed to achieve greenhouse gas (GHG) per capita emission reduction targets, consistent with Senate Bill (SB) 375 and other regional goals. In accordance with federal fiscal constraint requirements, Connect SoCal 2024 is a financially constrained Plan in terms of transportation revenues and expenditures. Connect SoCal 2024 would reduce traffic congestion, improve air quality, and improve the region's long-term economic viability through more than \$751 billion in transportation investments and a more sustainable regional development pattern. To view Connect SoCal 2024 and the accompanying technical reports, please visit the [Connect SoCal 2024](#) webpage.

Connect SoCal 2024 Vision and Goals

The SCAG Regional Council fully adopted the Plan on April 4, 2024. Connect SoCal 2024 represents the vision for the region and reflects the planned transportation investments, policies, and strategies that integrate with the Forecasted Regional Development Pattern to achieve the Plan's goals. The Vision and Goals for Connect SoCal 2024 are rooted in the direction set forth by Connect SoCal 2020, reflecting both SCAG's statutory requirements, the emerging trends, and persistent challenges facing the region. Reflecting input from engagement with stakeholders and members of the public, SCAG's vision for Southern California in the year 2050 is "*A healthy, prosperous, accessible and connected region for a more resilient and equitable future.*" The following goals and subgoals helps the SCAG region to achieve this vision.

Mobility: Build and maintain an integrated multimodal transportation network

- Support investments that are well-maintained and operated, coordinated, resilient and result in improved safety, improved air quality and minimized greenhouse gas emissions
- Ensure that reliable, accessible, affordable and appealing travel options are readily available, while striving to enhance equity in the offerings in high-need communities
- Support planning for people of all ages, abilities and backgrounds

Communities: Develop, connect and sustain communities that are livable and thriving

- Create human-centered communities in urban, suburban and rural settings to increase mobility options and reduce travel distances
- Produce and preserve diverse housing types in an effort to improve affordability, accessibility and opportunities for all households

Environment: Create a healthy region for the people of today and tomorrow

- Develop communities that are resilient and can mitigate, adapt to and respond to chronic and acute stresses and disruptions, such as climate change
- Integrate the region's development pattern and transportation network to improve air quality, reduce greenhouse gas emissions and enable more sustainable use of energy and water
- Conserve the region's resources

Economy: Support a sustainable, efficient and productive regional economic environment that provides opportunities for all residents

- Improve access to jobs and educational resources
- Advance a resilient and efficient goods movement system that supports the economic vitality of the region, attainment of clean air and quality of life for our communities

For ease of review, SCAG staff encourages the use of a side-by-side comparison of SCAG goals with discussions of the consistency, non-consistency, or non-applicability of the goals and supportive analysis in a table format. Suggested format is as follows:

SCAG CONNECT SOCAL 2024 GOALS AND SUBGOALS		
	Goal/Subgoal	Analysis
Mobility Goal:	<i>Build and maintain an integrated multimodal transportation network</i>	<i>Consistent: Statement as to why; Not-Consistent: Statement as to why; or Not Applicable: Statement as to why; DEIR page number reference</i>
Mobility Subgoal:	<i>Support investments that are well-maintained and operated, coordinated, resilient and result in improved safety, improved air quality and minimized greenhouse gas emissions</i>	<i>Consistent: Statement as to why; Not-Consistent: Statement as to why; or Not Applicable: Statement as to why; DEIR page number reference</i>
etc.		etc.

Connect SoCal 2024 Key Elements

Unique to this plan cycle, SCAG developed a set of Regional Planning Policies and Implementation Strategies to guide decision-making in the region toward integrated land use and transportation planning and other goals in Connect SoCal 2024. Eighty-eight Regional Planning Policies provide guidance for integrating land use and transportation planning to realize the vision of Connect SoCal 2024. The Implementation Strategies help the region to achieve this vision for the future and are priorities for SCAG efforts in fulfilling or going beyond the Regional Planning Policies. The Regional Planning Policies and Implementation Strategies were developed to achieve California’s greenhouse gas emission reduction goals as set forth in SB 375 and federal Clean Air Act Section 176(c) requirements for transportation conformity while meeting the broader regional objectives, such as improved equity and resilience in addition to preservation of natural lands, improvement of public health, increased roadway safety, support for the region’s vital goods movement industries and more efficient use of resources. The Plan also includes a detailed project list; strategic investments to bridge local plans with overarching regional performance targets and goals; a growth forecast and regional development pattern based on population, household and employment growth projections by 2050; and a transportation network including a list of transportation projects and investments.

Connect SoCal 2024 presents a summary of that work in five chapters of the Main Plan with additional details on Plan elements and analysis in the Plan’s accompanying 15 Technical Reports. Connect SoCal 2024 builds upon the progress from previous RTP/SCS cycles, reflecting both SCAG’s statutory requirements, the emerging trends, and persistent challenges facing the region. These policies offer a resource by which County Transportation Commissions (CTCs) or local jurisdictions within the SCAG region, when seeking resources from state or federal programs, can refer to specific policies to demonstrate alignment with the RTP/SCS.

Regional Growth Forecast and Forecasted Regional Development Pattern

As part of developing a Sustainable Communities Strategy per SB 375, SCAG must include a “forecasted development pattern for the region, which, when integrated with the transportation network and other transportation measures and policies ...” enables SCAG to reach its per capita GHG emission reduction target of 19 percent below 2005 levels by 2035. SCAG staff prepared a Forecasted Regional Development Pattern for Connect SoCal 2024 through 2050, the horizon year of the Plan. The regional growth forecast determines the projected increase in population, households, and jobs based on local general plans and known development entitlement agreements, including available data from 6th cycle housing element updates. The Connect SoCal 2024 [Demographic and Growth Forecast Technical Report](#) includes detailed discussions on socioeconomic data, including additional detail on the growth forecast, growth vision, and Sustainable Communities Strategy (SCS) consistency in Section of the Technical Report. The Connect SoCal 2024 [Land Use and Communities Technical Report](#) includes the most recent planning assumptions and estimates of population and housing.

SCAG's work helps facilitate implementation, but SCAG does not directly implement or construct projects or have land use authority. Achieving a sustained regional outcome depends upon informed and intentional local action. To access jurisdictional level growth estimates and forecasts for years 2035 and 2050, please refer to the [Final Connect SoCal 2024 growth forecast data](#). The growth forecasts for the region and the applicable jurisdiction is below.

	Adopted SCAG Region Growth Forecasts				City of Lake Elsinore Growth Forecasts		
	Year 2019	Year 2030	Year 2035	Year 2050	Year 2019	Year 2035	Year 2050
Population	18,827,000	19,476,000	19,946,000	20,909,000	69,800	84,200	92,000
Households	6,193,000	7,006,000	7,311,000	7,814,000	20,000	26,000	29,300
Employment	8,976,000	9,609,000	9,885,000	10,276,000	16,700	20,900	22,700

Consistency with Connect SoCal 2024

SCAG provides informational resources to facilitate the lead agency's consistency determination of the proposed project with Connect SoCal 2024. For the purpose of determining consistency with CEQA, local jurisdictions shall have the sole discretion to determine a local project's or plan's consistency and/or alignment with Connect SoCal 2024².

CEQA MITIGATION MEASURES

The SCAG Regional Council certified the [Final Program Environmental Impact Report](#) for Connect SoCal 2024 (2024 PEIR) and adopted the Mitigation Monitoring and Reporting Program (MMRP), Findings of Fact, and a Statement of Overriding Considerations on April 4, 2024. The mitigation approach used in the 2024 PEIR recognizes the limits of SCAG's authority; distinguishes between SCAG commitments and project-level responsibilities and authorities; optimizes flexibility for project implementation; and facilitates CEQA streamlining (e.g., SB 375) and tiering where appropriate on a project-by project basis determined by each lead agency. Consistent with the approach, the 2024 PEIR identifies regional-level mitigation measures to be implemented by SCAG over the lifetime of the Plan as well as project-level mitigation measures that lead agencies can and should consider, as applicable and feasible, in subsequent project-specific design, CEQA review, and decision-making processes. Given that SCAG is not an implementing agency and has no decision-making authority over projects or any land use authority, it is ultimately up to each lead agency's own discretion to determine the appropriateness of mitigation measures, including exploring opportunities of voluntary regional advance mitigation programs, based on project-specific circumstances such as individual site conditions, project specific details, and community values. Therefore, SCAG staff recommends that the proposed project's CEQA lead agency review the 2024 PEIR for guidance, as appropriate.

² SCAG. April 2024. Connect SoCal 2024 [Demographic and Growth Forecast Technical Report](https://scag.ca.gov/sites/main/files/file-attachments/23-2987-tr-demographics-growth-forecast-final-040424.pdf). Accessible at: <https://scag.ca.gov/sites/main/files/file-attachments/23-2987-tr-demographics-growth-forecast-final-040424.pdf>