Rincon Consultants, Inc.
777 East Tahquitz Canyon Way, Suite 200-127
Palm Springs, California 92262
760-203-5120

September 26, 2025
Rincon Project No. 25-17323

Dennis Madison, Senior Vice President
Architecture & Engineering
Forest Lawn Memorial-Parks & Mortuaries
1712 South Glendale Avenue
Glendale, California 91205
Via email: dmadison@forestlawn.com

Subject: Jurisdictional Assessment of two Shallow Retention Basins for the Forest Lawn Cathedral City Specific Plan Project in Cathedral City, Riverside County, California

Dear Mr. Madison:

This letter presents the findings of a jurisdictional assessment completed for the Forest Lawn Cathedral City Specific Plan Project (project) located at 32123 Da Vall Drive within Cathedral City, Riverside County, California on an approximate 4.8-acre project site. This letter is predominantly focused on the potential jurisdictional status of two shallow retention basins located along the western and southern portions of the project site.

Project Site and Description

The approximately 4.8-acre project site is located at 32123 Da Vall Drive, on the west side of Da Vall Drive and south of Ramon Road in Cathedral City, Riverside County, California. It is our understanding that Forest Lawn has owned this property since 2005 and operated a self--storage facility on the project site, which operations have gradually ceased over the last couple of years in anticipation of the current application for much needed cemetery property development. Forest Lawn is requesting approval of a Specific Plan from Cathedral City to allow Forest Lawn to develop additional cemetery uses on the site. As part of the Project, existing self-storage uses would be removed. Two existing shallow retention basins are present along the western and southern property boundaries. An existing cemetery owned and maintained by Forest Lawn is present immediately to the north of the site, and the existing Desert Shadows RV Resort is located immediately adjacent to the south and west of the project site. Attachment 1 – Figure 1 shows the project site and shallow retention basin locations.

Methodology

Desktop Assessment

Rincon initially conducted a desktop assessment to evaluate the presence or absence of any known potentially jurisdictional drainage features within the project area. The assessment consisted of a review of aerial imagery (Google Earth Pro 2025), the U.S. Geological Survey (USGS) National Hydrography Dataset (USGS 2025) and the U.S. Fish and Wildlife Service (USFWS) National Wetlands Inventory Wetlands (NWI) Mapper (USFWS 2025) to identify potential riparian/wetland resources in the project area. A formal aquatic resources delineation was not performed as part of this assessment and was not warranted.

Jurisdictional Assessment

A jurisdictional assessment was conducted within the project site on April 2, 2025, by Rincon Senior Biologist/Project Manager Jared Reed. The biologist walked the project site, including the entirety of the shallow retention basins, and inspected the area east of Da Vall Drive to ascertain any potential downstream connectivity to larger water bodies. The survey was conducted between 9:15 am and 11:00 am. Weather conditions during the survey included partly cloudy conditions, a temperature of 62 degrees Fahrenheit, and wind speeds of up to 21 miles per hour.

During the survey, the biologist searched for any areas within the project site that could qualify as U.S. Army Corps of Engineers (USACE)-jurisdictional waters of the U.S., Colorado River Basin Regional Water Quality Control Board (RWQCB)-jurisdictional waters of the State, and/or California Department of Fish and Wildlife (CDFW)-jurisdictional streambeds. Rincon specifically evaluated any hydrological features, such as evidence of water flow or pooling, vegetation, and soil conditions observed within the project site. Vegetative species observed during the field investigation are included in Attachment 2. Photographs of the assessed area were taken and are included in Attachment 3.

Vegetative species observed during the survey were identified using *The Jepson Manual: Vascular Plants of California, Second Edition* (Baldwin et. al. 2012), updated as necessary by Jepson eFlora (Jepson Flora Project 2025).

Jurisdictional Waters

Jurisdictional waters were evaluated at the desktop-level and during the field assessment. The presence and jurisdiction of aquatic features on the site was evaluated under the following standards.

Non-Wetland Waters of the United States

Non-wetland waters of the United States include navigable and interstate lakes, ponds, and rivers, and their relatively permanent (i.e., flowing at least seasonally) tributaries. The lateral limits of USACE jurisdiction (i.e., width) for non-wetland waters are determined by the presence of physical characteristics indicative of the Ordinary High Water Mark (OHWM) in accordance with the applicable Code of Federal Regulations (CFR) sections (33 CFR 328.3 and 33 CFR 328.4) and accompanying regulatory guidance and technical publications. Rincon evaluated sources of water, potential connections and distances to Traditional Navigable Waters, and other factors that affect whether waters qualify as “waters of the U.S.” under current USACE regulations (33 CFR 328.3), which incorporate the recent *Sackett v. USEPA* Supreme Court ruling. The current regulations were reviewed in the evaluation of non-jurisdictional features including artificially irrigated areas and roadway ditches excavated in uplands.

Wetland Waters of the United States

Federally jurisdictional wetlands are areas that have a continuous surface connection to navigable waters or their perennial or seasonal tributaries and that exhibit three parameters: a predominance of wetland vegetation, hydric soils, and wetland hydrology. Field delineation procedures are used to determine the presence of the three wetland parameters. A wetland delineation was not conducted as part of the jurisdictional assessment and was not warranted.

Waters of the State

The limits of “waters of the state,” as defined under the Porter-Cologne Water Quality Control Act, are any surface water or groundwater, including saline waters, within the boundaries of the state. In the project region, an OHWM is typically determined to represent the limits of waters of the state based on current interpretation of jurisdiction by the Colorado River Basin RWQCB. Potential state wetland features are evaluated pursuant to the State Water Resources Control Board's (SWRCB) State Wetland Definition and Procedures for Discharges of Dredged or Fill Material to Waters of the State (SWRCB 2019). The SWRCB's state wetlands definition relies on the same three parameters as the USACE definition (hydrophytic vegetation, wetland hydrology, and hydric soils), but allows for naturally unvegetated areas meeting the other two parameters to be considered wetlands. Additionally, state wetlands may be hydrologically isolated and need not be connected to any other body of water.

CDFW Streambeds

The extent of potential streambeds, streambanks, lakes, and riparian habitat subject to CDFW jurisdiction under Sections 1600 et seq. of the California Fish and Game Code (CFGC) is based upon the outer limit of riparian vegetation, where present, or the tops of banks. In desert areas, the CDFW often requests that mapping be conducted using the Mapping Episodic Stream Activity (MESA) method. This method delineates desert wash boundaries based on aerial photo indicators of historic flow, and often results in a much broader delineated area.

Existing Conditions

The project site is located at an existing self-storage facility owned by Forest Lawn. Two shallow retention basins are present between the existing -self storage facility uses and the Desert Shadows RV Resort to the south and west of the project site. These basins contain manholes that provide access to an underground storm drain system and are maintained by the Coachella Valley Water District. The basins originate from a landscaped area that contains an existing swale along the northern perimeter of the project site and sandy and gravelly soils. This area presumably was constructed to safely collect and convey surface runoff from an existing asphalt parking lot in the northwestern portion of the project site as well as surface runoff over a concrete pad and under a chain-link fence at the north end of the retention basin. These basins contain a slight depression in their central portions throughout their lengths. The basins run north to south along the west side of the project site and then west to east along the south side of the project site.

In a small area within the north-south trending portion of the retention basins, a concrete pad and flat, narrow culvert collects road runoff from an offsite concrete channel to the west and conveys this runoff into the underground storm drain system.

Surface runoff within the retention basins exits at their east-end through five small gaps at the bottom of an existing brick wall. Ungrouted riprap has been placed on the east side of this wall, presumably to control erosion before surface runoff reaches Da Vall Drive. Water within the underground storm drain system is conveyed under Da Vall Drive and exits via a 12-inch pipe onto ungrouted riprap until reaching a concrete channel that conveys flows further away from the project site to the northeast.

The retention basins are primarily vegetated with non-native ornamental trees, including silver dollar gum (*Eucalyptus polyanthemos*), pine trees (*Pinus* sp.), palm trees (*Washingtonia* sp.), and velvet ash (*Fraxinus velutina*), with an understory of mostly non-native grass and weedy vegetation, such as Mediterranean grass (*Schismus* sp.), London rocket (*Sisymbrium irio*), shortpod mustard (*Hirschfeldia incana*), and common sowthistle (*Sonchus oleraceus*). Some native shrubs, such as honey mesquite (*Neltuma odorata*), are present. A full list of vegetative species observed within the retention basins is included as Attachment 2. No special status plant species were observed on the project site.

Results

Despite the presence of a slight depression within the shallow retention basins, no evidence of hydrology such as sediment transport or deposits, drift deposits, an OHWM, or bed and banks were observed, with the exception of one small area at the southwest corner of the basins where erosion has exposed a manhole and a PVC pipeline. The sandy substrates that are within the basins were likely placed as backfill on top of the underground storm drain system. The basins potentially collect surface runoff from the parking lot and adjacent areas; however, no drainage features are present within the project site. Water within the basins is primarily conveyed through the underground storm drain system. No wetland or hydrophytic vegetation was observed within the storm drain easement. Additionally, as reviewed on aerial photography and confirmed in the field, there is no upstream or downstream connectivity from the basins to any drainage features. As a result, USACE-jurisdictional waters of the U.S., RWQCB-jurisdictional waters of the State, and CDFW-jurisdictional streambeds are not present within the basins.

If you have any questions regarding this submission or any of the information provided herein, please contact either Jared Reed (jreed@rinconconsultants.com) or Greg Ainsworth (gainsworth@rinconconsultants.com).

Sincerely,
Rincon Consultants, Inc.

Jared Reed
Senior Biologist/Project Manager

Greg Ainsworth
Director – Natural Resources

Attachments

Attachment 1 Project Location
Attachment 2 Floral Compendium
Attachment 3 Site Photographs

References

Baldwin , B.G., D.H. Goldman, D.J. Keil, R. Patterson, T.J. Rosatti, and D.H. Wilken (Eds.). 2012. *The Jepson Manual: Vascular Plants of California, Second Edition, Thoroughly Revised and Expanded.* University of California Press. Berkeley, California.

Environmental Protection Agency (EPA). 2024. Definition of "Waters of the United States": Rule Status and Litigation Update. Available at: https://www.epa.gov/wotus/definition-waters-united-states-rule-status-and-litigation-update. Accessed April 2025.

Google Earth Pro. 2025. Available at: https://earth.google.com/web. Accessed March 2025.

Jepson Flora Project (Eds.) 2025. Jepson eFlora. Available at: https://ucjeps.berkeley.edu/eflora/. Accessed April 2025.

State Water Resources Control Board (SWRCB). 2019. *Wetland Definition and Procedures for Discharges of Dredge and Fill Material to Waters of the State.* Adopted April 2, 2019. Available at: https://www.waterboards.ca.gov/water_issues/programs/cwa401/docs/procedures_conformed.pdf. Accessed November 2024.

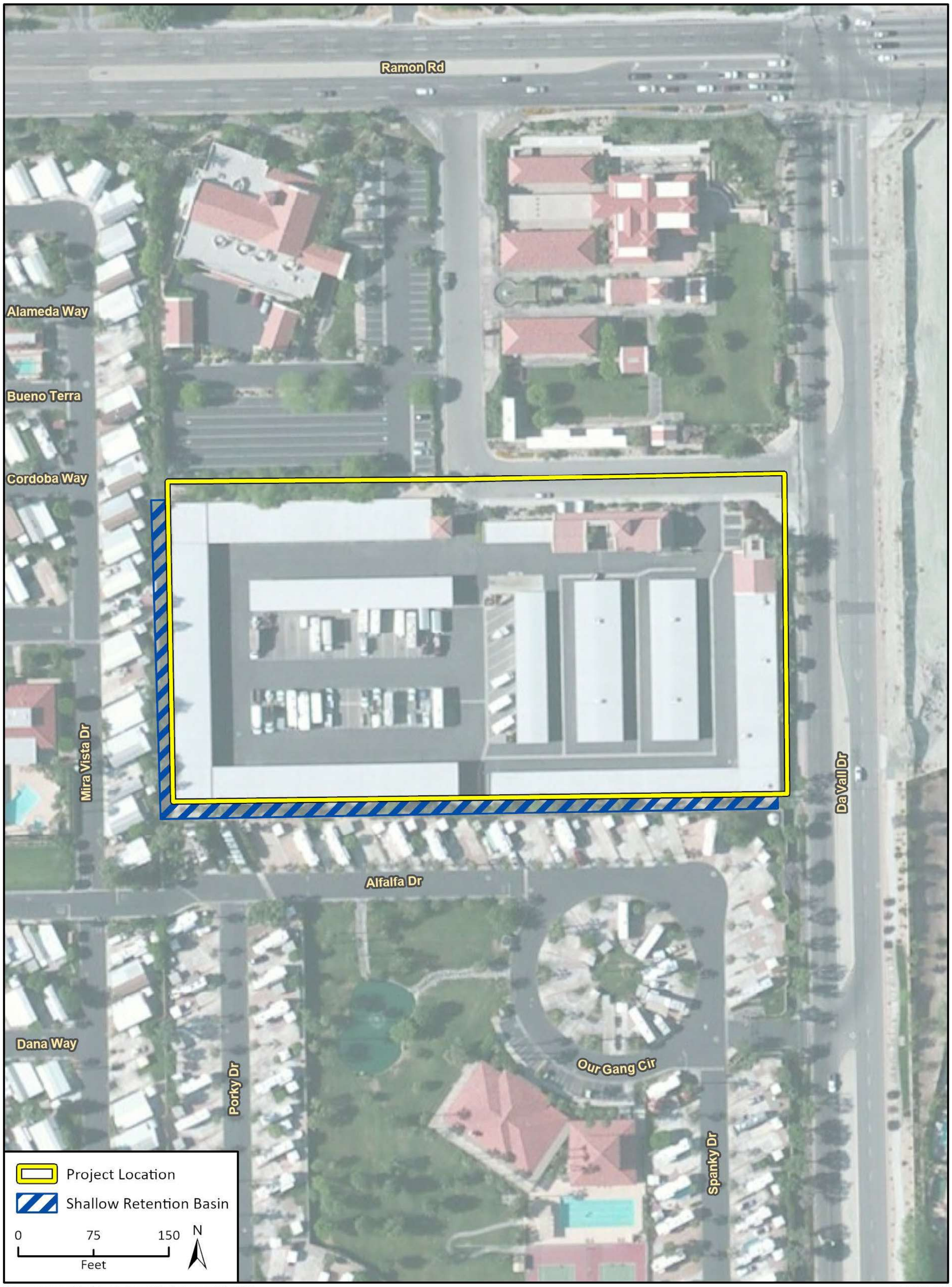
United States Fish and Wildlife Service (USFWS). 2025. National Wetlands Inventory. Retrieved from: http://www.fws.gov/wetlands/. Accessed March 2025.

United States Geological Survey (USGS). 2025. National Hydrography Dataset. Available at: https://www.usgs.gov/national-hydrography/national-hydrography-dataset. Accessed March 2025.

Attachment 1

Project Location

Figure 1 Project Location



Imagery provided by Esri and its licensors © 2025.

25-17323 BIO
Fig 2 Project Location

Attachment 2

Floral Compendium

Table 1 Floral Compendium

Scientific Name	Common Name	Status	Native or Introduced
Shrubs			
Acacia sp.	acacia	None	Introduced
Bougainvillea spectabilis	bougainvillea	None	Introduced
Eriogonum sp.	buckwheat	None	Native
Prosopis glandulosa	honey mesquite	None	Native
Saxifraga sp.	saxifraga	None	Native
Herbs			
Brachychiton populneum	kurrajong	None	Introduced
Chenopodium sp.	goosefoot	None	Introduced
Chylismia claviformis	desert primrose	None	Native
Erigeron canadensis	horseweed	None	Native
Eulobus californicus	California mustard evening-primrose	None	Native
Eruca vesicaria ssp. *sativa*	garden-rocket	None	Introduced
Funastrum cynanchoides var. *hartwegii*	climbing milkweed	None	Native
Hirschfeldia incana	shortpod mustard	None	Introduced
Lantana sp.	lantana	None	Introduced
Malacothrix glabrata	desert dandelion	None	Native
Phacelia crenulata	heliotrope phacelia	None	Native
Portulaca oleracea	common purslane	None	Introduced
Sisymbrium irio	London rocket	None	Introduced
Sonchus oleraceus	Common sow-thistle	None	Introduced
Tribulus terrestris	puncture vine	None	Introduced
Grasses			
Cynodon dactylon	Bermuda grass	None	Introduced
Schismus sp.	Mediterranean grass	None	Introduced
Pennisetum setaceum	crimson fountain grass	None	Introduced
Trees			
Eucalyptus polyanthemos	silver dollar gum	None	Introduced
Fraxinus velutina	velvet ash	None	Native
Pinus sp.	pine	None	Introduced
Washingtonia sp.	palm tree	None	Introduced

Attachment 3

Site Photographs

Photograph 1. East-facing view of landscaped area south of parking lot where runoff is collected.

Photograph 2. A man-hole is shown in the landscaped area in between the shallow retention basins and the parking lot. No drainage feature or evidence of flows is present.

Photograph 3. South-facing view of chain-link fence and north end of the retention basin.

Photograph 4. View of concrete pad and flat, narrow culvert collecting road runoff from offsite, facing northwest.

Photograph 5. Eroded area with man-hole and exposed PVC pipe at southwest corner of retention basin.

Photograph 6. View of ornamental trees in the retention basin, facing north.

Photograph 7. View of Eucalyptus trees and weedy vegetation in retention basin, facing west.

Photograph 8. View of east end of retention basin, where runoff exits through five gaps at the bottom of the brick wall.

Photograph 9. View of ungrouted riprap on east side of brick wall with five gaps in the wall shown.

Photograph 10. East-facing view of area where flows from the underground storm drain outlet east of Da Vall Drive.