APPENDIX A
NOTICE OF PREPARATION AND RESPONSE LETTERS

RIVERSIDE COUNTY
PLANNING DEPARTMENT

John Hildebrand
Planning Director

DATE: **MARCH 4, 2026**

TO: **RESPONSIBLE AND TRUSTEE AGENCIES, INTERESTED ORGANIZATIONS, AND INDIVIDUALS**

SUBJECT: **NOTICE OF PREPARATION OF A DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT (EIR) AND NOTICE OF EIR SCOPING MEETINGS FOR THE CABAZON INFRASTRUCTURE PLAN AND CABAZON COMMUNITY PLAN PROJECT (GPA NO. 01206 AND ZR6234)**

		CONTACT:	PHONE:	EMAIL:
LEAD AGENCY:	County of Riverside	Candice Hughes	(951) 955- 1639	CabazonPlan@rivco.org
STREET ADDRESS:	4080 Lemon Street, 12th Flr			
CITY/STATE/ZIP:	Riverside, CA 92501			
MAILING ADDRESS:	P.O. Box 1409, Riverside CA 92502			

Pursuant to CEQA, notice is given to responsible and trustee agencies, interested organizations, and individuals that the County of Riverside plans to oversee the preparation of a Program Environmental Impact Report (EIR) for the below-described project. The purpose of this notice is to solicit guidance from Responsible and Trustee Agencies, Interested Organizations, and Individuals as to the scope and content of the environmental information to be included in the EIR. In accordance with the time limits mandated by State law, your response should be submitted to this office as soon as possible, but **not later than thirty (30) days** after receiving notice. The public review period is from **Monday, March 9, 2026** to **Wednesday, April 8, 2026**. Please send your response to **Candice Hughes** at the email or mailing address shown above.

PROJECT TITLE:	Cabazon Infrastructure Plan and Cabazon Community Plan Project
PROJECT APPLICANT:	County of Riverside
PROJECT LOCATION:	Unincorporated Riverside County community of Cabazon, which is located in the northwestern portion of Riverside County immediately east of the City of Banning

PROJECT DESCRIPTION: The proposed project would include the implementation of the Cabazon Community Plan and corresponding Cabazon Infrastructure Plan (CIP) in accordance with the County's 6th Cycle Housing Element Action H-27. The goal of the Cabazon Community Plan is to address the Community of Cabazon's land use and infrastructure needs to prepare the Cabazon area for significant anticipated growth and development, particularly as the region plans for the possibility of accommodating up to 25,000 new housing units over the next 30 years. The CIP would support buildout of the Community Plan by identifying needs and suggesting alternatives for the availability and expansion of infrastructure in the Cabazon Community Plan area. The project description, location, and the potential environmental effects are contained in the attached Project Information Packet. Additional information is available online at: https://planning.rctlma.org/cabazon-community-plan

PUBLIC SCOPING MEETINGS: An informational EIR Public Scoping Meeting is scheduled on **March 18, 2026 at 9:00 AM** at the Riverside County Planning Commission located at 4080 Lemon St, Riverside, CA, 92501. Responsible and trustee agencies, interested organizations, and individuals including members of the public can attend the EIR Public Scoping Meeting.

Date: March 4, 2026

Candice Hughes

Candice Hughes, District 5 Principal Planner

PROJECT INFORMATION PACKET

I. INTRODUCTION

Pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15082, the County of Riverside has distributed this Notice of Preparation/Project Information Packet for the Cabazon Infrastructure Plan (CIP) and Cabazon Community Plan Project Program Environmental Impact Report (EIR).

The sections that follow describe the project's location in the region; summarize the Community Plan document; summarize the CIP document; and list the issue areas to be evaluated in the EIR, which will be prepared in accordance with CEQA Guidelines Section 15168.

II. REGIONAL LOCATION

The CIP and Cabazon Community Plan Project area (project area) is located within the northwestern portion of the County of Riverside, immediately east of the city of Banning; refer to Figure 1, *Regional Location Map*. On a regional basis, the project area is accessible by Interstate 10 (I-10), which bisects the project area in an east-west direction and provides interchanges to the project area at Malki Road, Morongo Trail, at Main Street. The project area is also bisected by the Union Pacific rail line which runs parallel to I-10 in the project area. The project area is approximately 7,768 acres and is bounded by the Morongo Indian Reservation to the north, unincorporated areas of Riverside County to the north and south, the cities of Desert Hot Springs and Palm Springs to the east, and the city of Banning to the west; refer to Figure 2, *Local Vicinity*.

The project area is entirely within the County of Riverside General Plan (General Plan) Pass Area Plan. Specifically, the project area is located within the Cabazon Policy Area of the Pass Area Plan.

III. CIP AND CABAZON COMMUNITY PLAN PROJECT DESCRIPTION

The proposed project would include the implementation of the Cabazon Community Plan and corresponding CIP in accordance with 6th Cycle Housing Element Action H-27. The goal of the Cabazon Community Plan (GPA No. 01206) is to address the Community of Cabazon's land use and infrastructure needs to prepare the Cabazon area for significant anticipated growth and development, particularly as the region plans for the possibility of accommodating up to 25,000 new housing units over the next 30 years. Further, the Community Plan is proposed to address topics related to the Cabazon community such as land use, character and design, access and circulation, infrastructure and public services, and design standards.

Based on the General Plan, existing land uses within the project area the following: Mixed Use Area, Highest Density Residential, Medium Density Residential, Low Density Residential, Rural Residential, Rural Desert, Rural Mountainous, Commercial Retail, Light Industrial, Open Space – Conservation, Open Space – Rural, and Freeway; refer to Figure 3, *Existing Land Use Map*.

The Cabazon Community Plan Land Use Map proposes the following types of land uses: Commercial Retail, High Density Residential, Highest Density Residential, Low Density Residential, Medium Density Residential, Very Low Density Residential, Rural Residential, Rural Desert, Rural Mountainous, Mixed-Use Area, Light Industrial, Heavy Industrial, Public Facilities, Open Space – Conservation, and Freeway; refer to Figure 4, *Proposed Land Use Map*.

The CIP (ZR6234) would support buildout of the Community Plan by identifying needs and suggesting alternatives for the availability and expansion of infrastructure in the Cabazon Community Plan area. The CIP projects covered under the EIR have been divided into the following categories:

- Domestic Water Supply and Distribution
- Wastewater Collection and Treatment
- Flood Control and Drainage Systems
- Electric Power Supply
- Natural Gas Distribution
- Telecommunications and Broadband Services
- Roadway Right-of-Way

IV. PROJECT APPROVALS

Approval of the CIP and Cabazon Community Plan will require amendments to the County of Riverside General Plan, Zoning Code, and Zoning Map, as well as an approval of Community Design Guidelines.

V. POTENTIAL ENVIRONMENTAL EFFECTS

The EIR will evaluate potential environmental impacts resulting from the project, and will address the following environmental topical areas:

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire
- Growth Inducement

Due to the decision to prepare an EIR, an Initial Study was not prepared. This option is permitted under CEQA Guidelines Section 15063(a), which states that if the Lead Agency determines an EIR will be required for a project, the Lead Agency may skip further initial review and begin work on the EIR.

VI. RESPONSES AND PUBLIC SCOPING MEETINGS

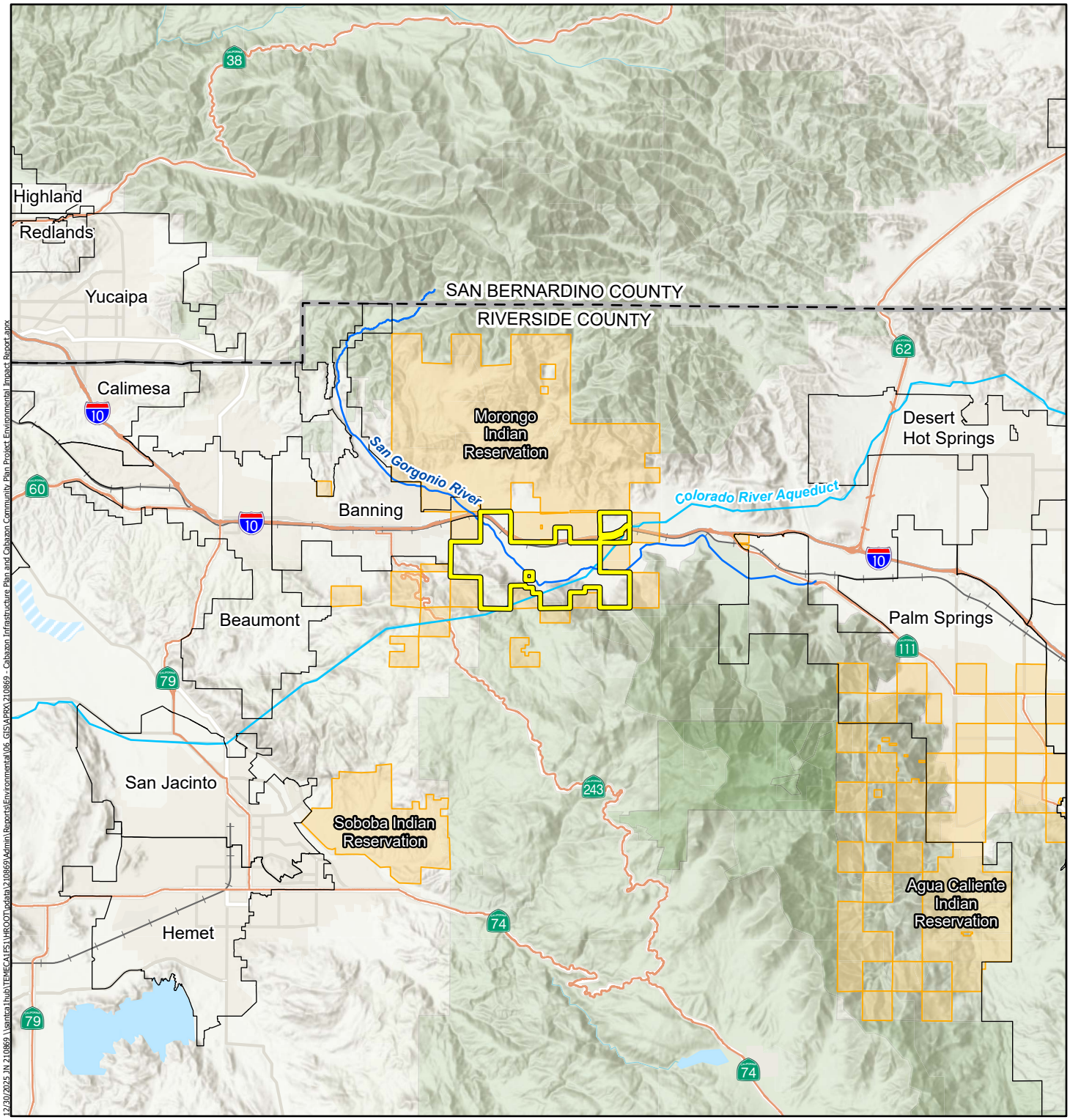
The County of Riverside requests responsible and trustee agencies, interested organizations, and individuals to provide written or verbal comments as to the scope and content of the environmental information and analysis to be included in the EIR, in connection with the proposed CIP and Cabazon Community Plan Project. **The 30-day NOP review period begins on Monday, March 9, 2026, and ends on Wednesday, April 8, 2026 at 5:00 PM**. Due to the time limits mandated by State law, please send your written response to the County of Riverside at the address below at the earliest possible date but no later than **Wednesday, April 8, 2026 at 5:00 PM**.

Written correspondence should be directed to:

Riverside County Transportation and Land Management Agency
Attn: Candice Hughes, District 5 Principal Planner
P.O. Box 1409
Riverside, CA 92502

Responses may also be submitted by email to CabazonPlan@rivco.org. Please include your name and address for all written correspondence.

An informational EIR Public Scoping Meeting is scheduled on **March 18, 2026 at 9:00 AM** at the Riverside County Planning Commission located at 4080 Lemon St, Riverside, CA, 92501.



Legend

- Highways
- Railroads
- Aqueduct
- River
- Cabazon Community Plan Boundary
- City Boundaries
- County Boundaries
- Tribal Lands

CABAZON INFRASTRUCTURE PLAN AND CABAZON COMMUNITY PLAN PROJECT
ENVIRONMENTAL IMPACT REPORT

Michael Baker INTERNATIONAL

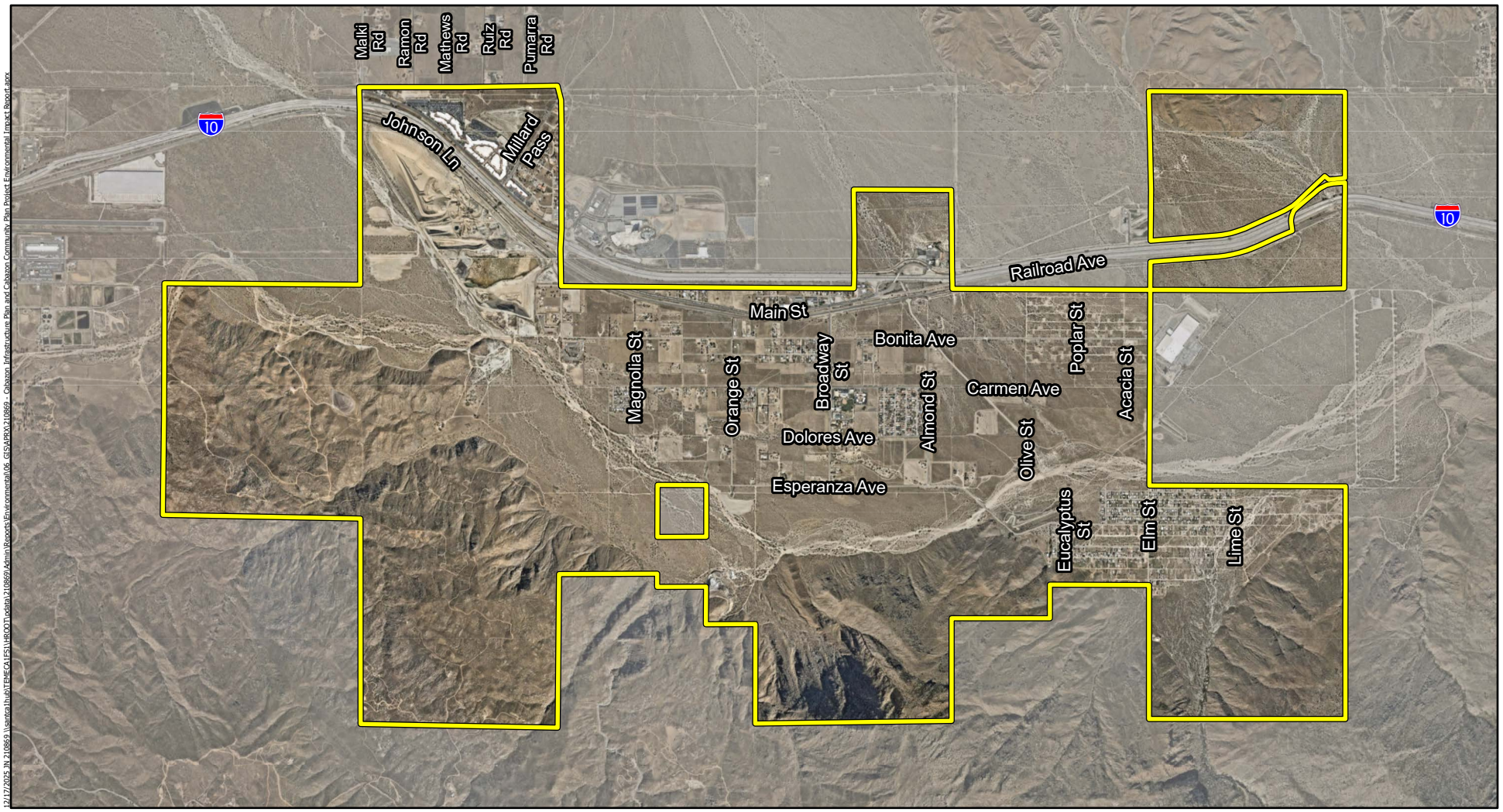
0 2.5 5 Miles

Source: Esri, ArcGIS Online, California Department of Technology, Caltrans, Riverside County

Regional Vicinity

Figure 1

12/30/2025 JN 210869 \\santa1hub\TEMECA1FS1\HROOT\data\210869\Admin\Reports\Environmental\06_GIS\APRX\210869_Cabazon Infrastructure Plan and Cabazon Community Plan Project Environmental Impact Report.aprx



Legend

Cabazon Community Plan Boundary

CABAZON INFRASTRUCTURE PLAN AND CABAZON COMMUNITY PLAN PROJECT
ENVIRONMENTAL IMPACT REPORT

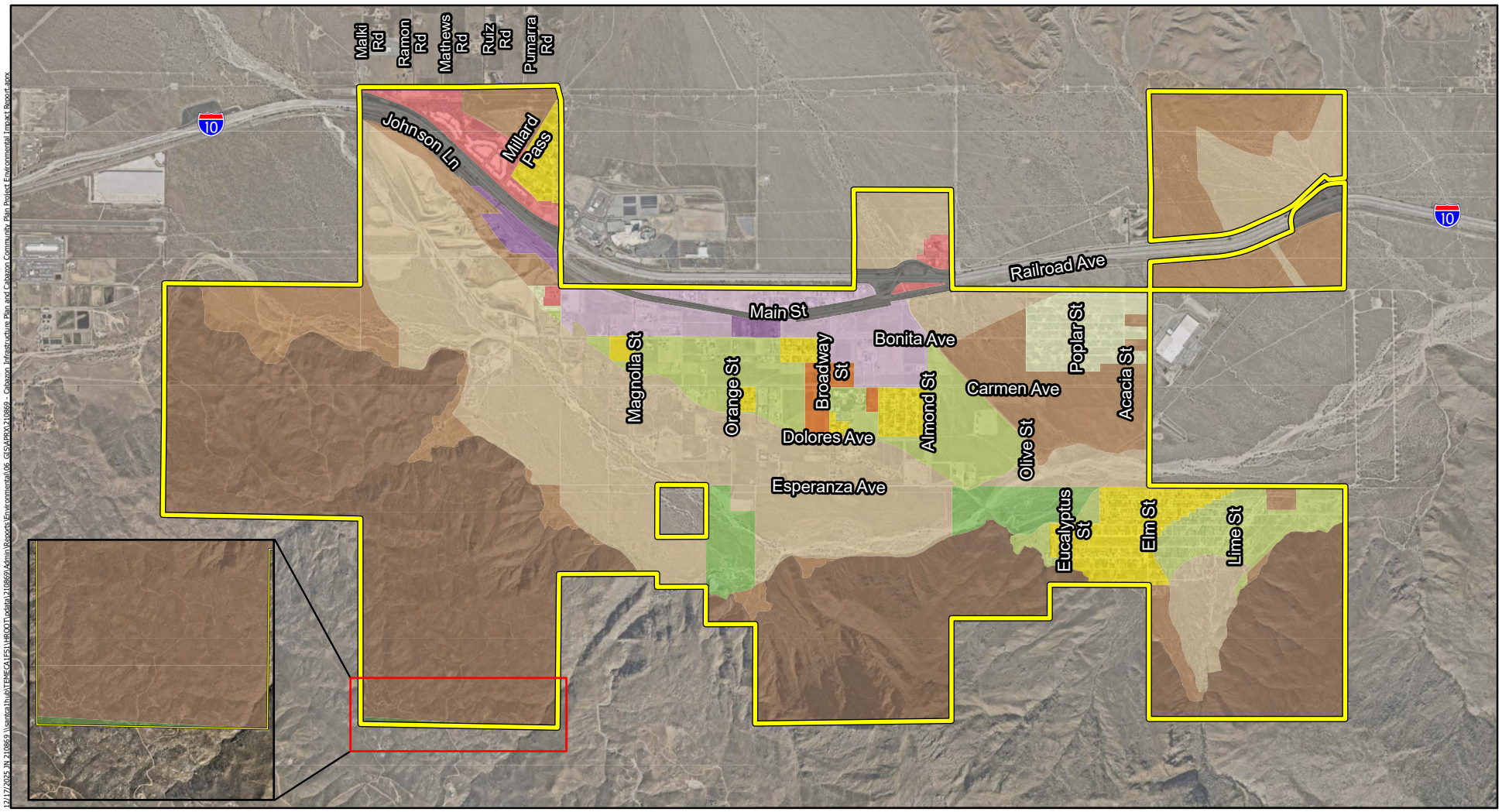
Local Vicinity

Figure 2

Michael Baker INTERNATIONAL

0 0.5 1 Miles

Source: Esri, ArcGIS Online, Riverside County, 2025 Nearmap Imagery



Legend

Cabazon Community Plan Boundary

Existing Land Use

- Commercial Retail (CR)
- Freeway (FWY)
- Highest Density Residential (HHDR)
- Light Industrial (LI)
- Low Density Residential (LDR)
- Medium Density Residential (MDR)
- Mixed Use Area (MUA)
- Open Space - Conservation (OS-C)
- Open Space - Rural (OS-RUR)
- Rural Desert (RD)
- Rural Mountainous (RM)
- Rural Residential (RR)
- Very Low Density Residential (VLDR)

Michael Baker INTERNATIONAL

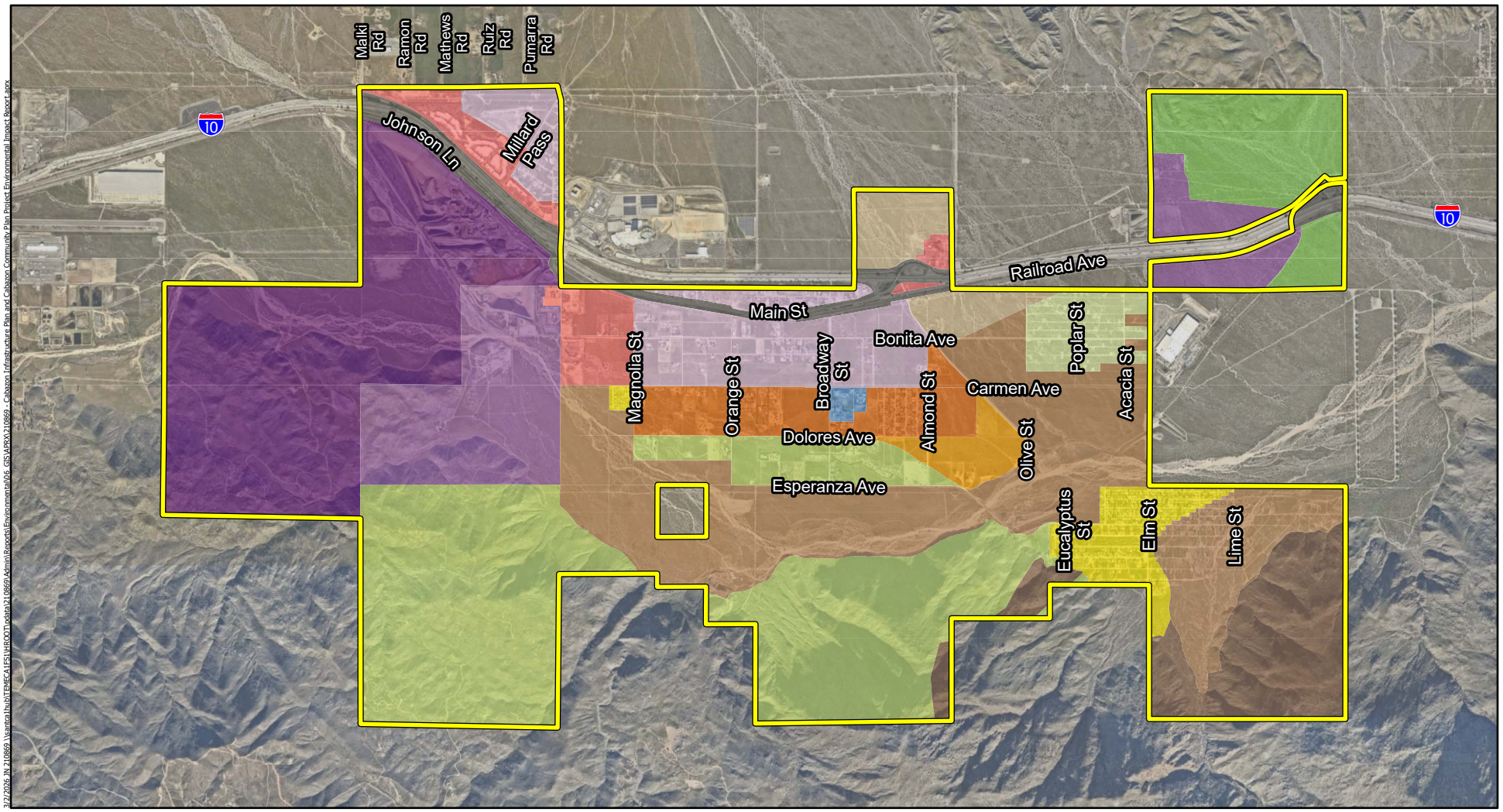
0 0.5 1 Miles

Source: Esri, ArcGIS Online, Riverside County, 2025 Nearmap Imagery

CABAZON INFRASTRUCTURE PLAN AND CABAZON COMMUNITY PLAN PROJECT
ENVIRONMENTAL IMPACT REPORT

Existing Land Use Map

Figure 3



Legend

- Cabazon Community Plan Boundary

Proposed Land Use

- Commercial Retail (CR)
- Freeway (FWY)
- High Density Residential (HDR)
- Highest Density Residential (HHDR)
- Heavy Industrial (HI)
- Low Density Residential (LDR)
- Light Industrial (LI)
- Medium Density Residential (MDR)
- Mixed Use Area (MUA)
- Open Space - Conservation (OS-C)
- Public Facilities (PF)
- Rural Desert (RD)
- Rural Mountainous (RM)
- Rural Residential (RR)
- Very Low Density Residential (VLDR)

Michael Baker INTERNATIONAL

0 0.5 1 Miles

Source: Esri, ArcGIS Online, Riverside County, 2025 Nearmap Imagery

CABAZON INFRASTRUCTURE PLAN AND CABAZON COMMUNITY PLAN PROJECT
ENVIRONMENTAL IMPACT REPORT

Proposed Land Use Map

Figure 4

RIVERSIDE COUNTY
PLANNING DEPARTMENT

REPORT OF ACTIONS
RIVERSIDE COUNTY PLANNING COMMISSION – MARCH 18, 2026
COUNTY ADMINISTRATIVE CENTER
1st Floor, Board Chambers, 4080 Lemon Street, Riverside, CA 92501

1st District	2nd District	3rd District	4th District	5th District
Ariel Savage	Marissa Gruytch Chair	Shellie Clack Vice-Chair	Bill Sanchez	Vacant

CALL TO ORDER: 9:00 a.m.
OATH OF OFFICE
ROLL CALL: Members Present: Savage, Gruytch, Clack, and Sanchez
Members Absent: None

1 CONSENT CALENDAR:

1.1 30088 SECOND EXTENSION OF TIME REQUEST FOR TENTATIVE TRACT MAP NO. 31810 (TR31810E02) – Applicant: Predico Properties c/o Michael Wright – Fifth Supervisorial District – Valle Vista District – San Jacinto Valley Area Plan: Community Development: Medium Density Residential, (CD: MDR) and Medium High Density Residential (CD: MHDR) – Location: north of Palm Ave, west of Lincoln Ave, south of Olive Ave, and east of Fairview Ave – 44.77 Acres – Zoning: R-4 (Planned Residential) – Project Description: Schedule "A" - Subdivision of 42.61 acres into 187 Single-Family Residential Lots including one (1) Open Space and one (1) Detention Basin was originally approved on March 10, 2020, and the First Extension of Time was approved on February 1, 2023 – REQUEST: Second Extension of Time Request for Tentative Tract Map No. 31810 (TR31810E02), extending the expiration date for three (3) years to March 10, 2029. APNs: 548-040-037 and 549-210-038 – Related Cases: TR31810 and TR31810E01 – Project Planner: Edward Lincoln at 951-955-8514, or email at elincoln@rivco.org. District 5.

Planning Commission Action:
Public Hearing: Closed

Motioned by Commissioner Sanchez, 2nd by Commissioner Gruytch

By a vote of 4-0, the Planning Commission took the following action:

APPROVED the Second Extension of Time Request for Tentative Tract Map No. 31810, subject to the previously approved and amended Conditions of Approval.

2 PUBLIC HEARINGS CONTINUED:
NONE

3. PUBLIC HEARINGS – NEW:

3.1 29899 CHANGE OF ZONE NO. 2400053 (CZ2400053) & CONDITIONAL USE PERMIT NO. 240025 (CUP240025) – Exempt from the California Environmental Quality Act (CEQA), pursuant to State CEQA Guidelines Section 15301 (Existing Facilities) – Applicant: Salim Daher, c/o DB Oil – Engineer/Representative: Western States Engineering c/o Joseph Karaki – Second Supervisorial District – Meadowbrook Zoning Area – Elsinore Area Plan: Community Development: Commercial Retail (CD:CR) – Location: northwest of Highway 74 and south of El Toro Cutoff – 1.44 Gross Acres – Zoning: Manufacturing-Service Commercial (M-SC) – REQUEST: CZ2400053 is a request to change the existing zoning classification of the subject site from Manufacturing – Service Commercial (M-SC) to Scenic Highway Commercial (C-P-S) to allow for the

Planning Commission Action:
Public Hearing: Closed

Motioned by Commissioner Gruytch, 2nd by Commissioner Sanchez

By a vote of 4-0, the Planning Commission recommended that the Board of Supervisors take the following actions:

TENTATIVELY APPROVE Change of Zone No. 2400053; and,

TENTATIVELY APPROVE Conditional Use Permit No. 240025, subject to the Advisory Notification Document and Conditions of Approval.

sale of alcoholic beverages in conjunction with a gas station within the C-P-S zoning classification. CUP240025 is a request to allow for the sale of alcoholic beverages for off-premises consumption by establishing a Type 21 (Off-Sale Beer, Wine & Spirits) ABC license in conjunction with the proposed convenience store and gas station established under the previously approved Plot Plan No. 210016 (PPT210016). APN(s): 347-130-028, 347-130-029. – Project Planner: Suhaim Bawany (951)955-3103, or email at sbawany@rivco.org.

4 GENERAL PLAN AMENDMENT INITIATION PROCEEDINGS:

4.1 29807 INITIATION OF FOUNDATION COMPONENT GENERAL PLAN AMENDMENT NO. 240062 (GPA240062) – Applicant: RJ Noble Co. c/o Austin Carver – Engineer/Representative: Benchmark Resources c/o Andrew White – Second Supervisorial District – Glen Ivy Zoning Area/District – Temescal Canyon Area Plan – General Plan Foundation Component - Existing: Open Space (OS) - Proposed: Community Development (CD) – Location: north of Indian Truck Trail, east of Maitri Road, south of Glen Ivy Road & Temescal Canyon Road, and west of North Main Drive – 33.52 Gross Acres – Existing Zoning: M-R-A (Mineral Resources and Related Manufacturing) – REQUEST: The applicant requests that the County of Riverside consider whether to recommend the initiation of GPA240062 to change the General Plan Foundation Component of two (2) parcels from Open Space: Mineral Resources (OS: MIN) to Community Development: Heavy Industrial (CD: HI). Additional development applications and review by the County to confirm that the overall project complies with applicable standards, policies, findings, and other requirements will be required if the proposed GPA240062 is initiated by the Board of Supervisors. APNs: 290-110-020 & 290-110-059 – Project Planner: Edward Lincoln at (951) 955-8514, or email at elincoln@rivco.org. District 2.

Planning Commission Action:
Public Hearing: Closed

District 1 – Support
District 2 – Support
District 3 – Neutral
District 4 – Support
District 5 – Vacant

RECOMMENDED the Initiation of Foundation Component General Plan Amendment No. 240062 move forward to the Board of Supervisors.

5 COMPREHENSIVE AGRICULTURAL PRESERVE TECHNICAL ADVISORY COMMITTEE (CAPTAC):
NONE

6 SCOPING SESSION:

6.1 29987 SCOPING SESSION FOR AN ENVIRONMENTAL IMPACT REPORT FOR GENERAL PLAN AMENDMENT NO. 240089 (GPA240089), CHANGE OF ZONE NO. 2400043 (CZ2400043), TENTATIVE TRACT MAP NO. 39041 (TTM39041), AND CONDITIONAL USE PERMIT NO. 240021 (CUP240021) – Applicant: Michael Ingster – Representative: Morgan Gallagher – Fourth Supervisorial District – Lower Coachella Valley Zoning District – Eastern Coachella Valley Area Plan – Community Development: Medium Density Residential (CD: MDR) – Location: north of 60th Avenue, east of Monroe Street, south of 58th Avenue, and west of Jackson Street – 29.99 Gross Acres – Zoning: R-1 (One-Family Dwellings) and R-5 (Open Area Combining Zone - Residential Developments) – REQUEST: GPA240089 is a proposal to amend the

Planning Commission Action:
Public Hearing: Closed

The item was presented and opened for public comment; comments were received.

existing land use designation from Community Development: Medium Density Residential (CD: MDR) to proposed Community Development: Mixed Use Planning Area (CD: MUA). CZ2400043 is a proposal to amend the existing zone classification from R-1 (One-Family Dwellings) and R-5 (Open Area Combining Zone - Residential Developments) to proposed MU (Mixed Use). TTM39041 is a proposal to allow a Schedule "A" subdivision, with the existing parcel being divided into the following: 70 numbered lots (including 58 single-family, 1 multi-family, 3 commercial, and 8 open space lots), and 4 lettered lots for the purpose of dedicated privately maintained streets (Lots “A”, “B”, “C”, and “D”). CUP240021 is a proposal to allow for the construction of a resort and residences development that consists of a 67-guestroom hotel with an event pavilion, event lawn, pool, and shared parking, a spa and fitness center with a pool and shared parking, 31 single-story casitas (located on a single parcel), and 58 single-family dwellings, including 26 luxury villas and 32 branded residences. APN: 764-230-009 – Related Cases: PAR210028 – Project Planner: Elizabeth Mora-Rodriguez at (951) 955-5719, or email at emorarodriguez@rivco.org. District 4.

6.2 29997 SCOPING SESSION FOR CABAZON COMMUNITY PLAN GENERAL PLAN AMENDMENT NO. 1206 (GPA01206) – APPLICANT: County of Riverside – Fifth Supervisorial District – ENGINEER: KTGY – AREA PLAN: The Pass and Western Coachella Area Plans – Cabazon Policy Area and San Gorgonio Pass Wind Energy Policy Area – Pass and Desert District, Cabazon Zoning District and Whitewater Zoning Area – Location: Properties generally located southwest of the 10th St. and Millard Pass intersection, southwest of the Railroad Ave. and Apache Trail Intersection, north of Seminole Dr. directly east of Casino Morongo, and northwest of Rushmore Ave. and Penland Rd. Intersection – Approximately 470 Acres – REQUEST: GPA01206 consists of General Plan Foundation Component changes and Land Use Designation and policy updates, generally within the Pass and Western Coachella Area Plans. The proposed project would include the implementation of the Cabazon Community Plan (CCP) and corresponding Cabazon Infrastructure Plan (CIP) in accordance with the County’s 6th Cycle Housing Element. The goal of the CCP is to address the Community of Cabazon’s land use and infrastructure needs to prepare the Cabazon area for significant anticipated economic growth and development, particularly as the region plans for the possibility of accommodating up to 25,000 new housing units over the next 30 years in this environmental justice community. It will also revise the Area Plans and create new policies and neighborhood planning areas to provide direction for future orderly development of the communities. This scoping session is for the circulation of the Programmatic Environmental Impact Report to analyze the broad environmental effects of the Cabazon Community

Planning Commission Action:
Public Hearing: Closed

The item was presented and opened for public comment; comments were received.

Plan, which is an item of the County's 6th Cycle Housing Element Action H-27. The scoping session begins on March 9th, 2026, and ends on April 08, 2026. – Project Planner: Candice Hughes at (951) 955-1639, or email at chughes@rivco.org. District 5.

7 WORKSHOPS:
NONE

8 PUBLIC COMMENTS:
NONE

9 PLANNING DIRECTOR'S REPORT:
NONE

10 PLANNING COMMISSIONER'S COMMENTS:
NONE

ADJOURNMENT: 10:25 A.M.

From: TLMA Cabazon Plan
To: "Mendivil, Karina (TRBL)"; Thomson, Heather
Subject: RE: Agua caliente Tribal Historic Preservation - mail update
Date: Monday, March 16, 2026 7:27:00 AM

Good Morning Karina,

Thank you for the update.

Candice Hughes
District 05 Principal Planner
Transportation and Land Management Agency - Planning
4080 Lemon Street 12th Floor
Riverside, CA 92501
951-955-1639

From: Mendivil, Karina (TRBL) <kmendivil@aguacaliente.net>
Sent: Thursday, March 12, 2026 3:04 PM
To: TLMA Cabazon Plan <CabazonPlan@rivco.org>
Subject: Agua caliente Tribal Historic Preservation - mail update

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

Good afternoon,

I hope this email finds you well. We wanted to inform you that our preferred method of correspondence is now email rather that physical mail. We kindly request that all future correspondence be sent via email to, **ACBCI-THPO@aguacaliente.net** to ensure our timely communication.

If by chance it is required to send physical mail please make the correspondence to **Lacy Padilla**, As she is the current Director of the Agua Caliente Tribal Historic Preservation Office.
Also, please end all mail corresponding to Patricia Garcia – Plotkin/ and or Luz Salazar to this address as they are no longer working with us.

Please update your records accordingly and feel free to reach out if you have any questions,

Thank you,

Karina Mendivil
Administrative Assistant
5401 Dinah Shore Drive, Palm Springs, CA 92264
C: **(442) 998-**4073 | D: **(760) 699-6872**

From: Hughes, Candice
To: havertbill538@gmail.com
Cc: "palmcanyon@mac.com"
Subject: RE: Cabazon Community Plan
Date: Tuesday, March 24, 2026 1:33:00 PM

Good Afternoon Bill,

Thank you for contacting us for further information about the Cabazon Community Plan. To clarify, the Cabazon Community Plan is still under preparation. We are currently in the scoping session for the Programmatic Environmental Impact Report (PEIR) and receiving input from the public. The public scoping meeting was held at the Planning Commission on March 18, 2026. You can access the project information and view the recording of the meeting via the link below. It was Item 6.2 on the agenda.

https://riversidecountyca.iqm2.com/Citizens/Detail_Meeting.aspx?ID=3390

An updated proposed Land Use map and housing density map can also be viewed using the link below. We also have two additional open house sessions planned at the James A Venable Community Center in the upcoming months.

https://planning.rctlma.org/cabazon-community-plan#2741959481-2213170283

Please contact me if you have any questions. Thank you!

Candice Hughes
District 05 Principal Planner
Transportation and Land Management Agency - Planning
4080 Lemon Street 12th Floor
Riverside, CA 92501
951-955-1639

From: Bill Havert <havertbill538@gmail.com>
Sent: Tuesday, February 24, 2026 6:50 PM
To: Planning <Planning@RIVCO.ORG>
Cc: joan taylor <palmcanyon@mac.com>
Subject: Cabazon Community Plan

Can you tell me what the current status of the Cabazon Community Plan process is, whether there is a draft available for review, and what CEQA compliance is either in progress or intended?

Thanks,

Bill Havert

From:	Seth Alston
To:	TLMA Cabazon Plan
Subject:	Notice list for Cabazon Community Plan/Infrastructure Plan
Date:	Friday, April 3, 2026 9:20:35 AM
Attachments:	Outlook-logos.png

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

Hello,

I would like to receive updates regarding the planning and review process for the Cabazon Community and Infrastructure Plans. Please include me on the department's notice list for this Project.

Thank you,

Seth Alston (he/him)
Associate Attorney
Center for Biological Diversity
Urban Wildlands Program



STATE OF CALIFORNIA
DEPARTMENT OF FISH AND WILDLIFE

GAVIN NEWSOM, Governor
MEGHAN HERTEL, Director

Inland Deserts Region
3602 Inland Empire Blvd., Suite C-220
Ontario, CA 91764
wildlife.ca.gov

April 6, 2026
Sent via email

Candice Hughes
County of Riverside
4080 Lemon Street, 12th Floor
Riverside, CA 92501
cabazonplan@rivco.org

Subject:

Dear Candice Hughes:

Subject: Notice of Preparation of a Draft Environmental Impact Report
Cabazon Infrastructure Plan and Cabazon Community Plan Project
State Clearinghouse No. 2026030377

Dear Candice Hughes:

The California Department of Fish and Wildlife (CDFW) received a Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) from the County of Riverside for the Cabazon Infrastructure Plan and Cabazon Community 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

[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.

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 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 is located within the northwestern portion of the County of Riverside, immediately east of the city of Banning. On a regional basis, the Project area is accessible by Interstate 10, which bisects the project area in an east-west direction and provides interchanges to the project area at Malki Road, Morongo Trail, at Main Street. The project area is also bisected by the Union Pacific rail line which runs parallel to 1-10 in the project area. The project area is approximately 7,768 acres and is bounded by the Morongo Indian Reservation to the north, unincorporated areas of Riverside County to the north and south, the cities of Desert Hot Springs and Palm Springs to the east, and the city of Banning to the west. The Project area is surrounded by conservated lands, vacant lands, highways, and limited developed areas. The Project site is located within the boundaries of the Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP) and overlaps with significant portions of the Cabazon Conservation Area.

The Project proposes amendments to the County of Riverside General Plan, Zoning Code, and Zoning Map, as well as an approval of Community Design Guidelines that would result in changes in land use to allow the buildout of the Cabazon Community Plan and Cabazon Infrastructure Plan and their associated land use and infrastructure needs.

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist the County of Riverside 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 CVMSHCP.

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 County of Riverside 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.

The 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. 2009[2]). 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 (CNDDB) in Sacramento should be contacted at (916) 322-2493 or CNDDB@wildlife.ca.gov or https://wildlife.ca.gov/Data/CNDDB/Maps-and-Data to obtain current information on any previously reported sensitive species and habitat, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code, in the vicinity of the proposed Project.

[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/

CDFW's CNDDB 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 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.

   Burrowing Owl (*Athene cunicularia*)

   On October 10, 2024, the Fish and Game Commission determined that western burrowing owl warrants protection as a candidate species under the California Endangered Species Act (Fish & G. Code, § 2050 et seq.). During the candidacy period, western burrowing owl will be afforded the same protection as threatened and endangered species under CESA. If Project activities, including burrow exclusion and closure, could result in take, appropriate CESA authorization (i.e., Incidental Take Permit under Fish and Game Code section 2081) should be obtained prior to commencement of Project activities.

   The Project site has the potential to provide suitable foraging and/or nesting habitat for burrowing owl. Take of individual burrowing owls and their nests is defined by Fish and Game Code section 86, and prohibited by sections 3503, 3503.5 and 3513. Take is defined in Fish and Game Code section 86 as "hunt, pursue, catch, capture or kill, or attempt to hunt, pursue, catch, capture or kill." Permittees of the CVMSHCP must ensure that Covered Activities within their jurisdictions—both inside and outside Conservation Areas—do not result in the take of the burrowing owl individuals, nests, or eggs. An activity that results in the take of burrowing owl individuals, nests, or eggs would be unlawful and would not be a Covered Activity under the CVMSHCP. The County has an obligation under the CVMSHCP to ensure the Project does not result in the take of burrowing owl individuals, nests, and eggs.

CDFW recommends that the County of Riverside follow the recommendations and guidelines provided in the *Staff Report on Burrowing Owl Mitigation* (Department of Fish and Game, March 2012); available for download from CDFW's website: https://www.wildlife.ca.gov/conservation/survey-protocols. The Staff Report on Burrowing Owl Mitigation, specifies three steps for project impact evaluations:

a. A habitat assessment;

b. Surveys; and

c. An impact assessment

As stated in the Staff Report on Burrowing Owl Mitigation, the three progressive steps are effective in evaluating whether a project will result in impacts to burrowing owls, and the information gained from the steps will inform any subsequent avoidance, minimization, and mitigation measures. Habitat assessments are conducted to evaluate the likelihood that a site supports burrowing owl. Burrowing owl surveys provide information needed to determine the potential effects of proposed projects and activities on burrowing owls, and to avoid take in accordance with Fish and Game Code sections 86, 3503, and 3503.5. Impact assessments evaluate the extent to which burrowing owls and their habitat may be impacted, directly or indirectly, on and within a reasonable distance of a proposed CEQA project activity or non-CEQA project.

4. 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 2018[3])

5. Information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis on resources that are rare or unique to the region (CEQA Guidelines § 15125[c]).

6. A full accounting of all open space and mitigation/conservation lands within and adjacent to the Project.

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

The DEIR should provide a thorough discussion of the direct, indirect, and cumulative impacts expected to adversely affect biological resources as a result of the Project (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:

[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)

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 direct and 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).

   Please note that the Project area supports significant biological resources and contains essential ecological process areas, and habitat connections, providing for wildlife movement across the broader landscape, sustaining both transitory and permanent wildlife populations. Significant portions of the Project are located within the CVMSHCP Cabazon Conservation Area, including areas with specific requirements and Permittee obligations associated with Fluvial Sand Transport Areas and the Fornat Wash Biological Corridor. See CVMSHCP Section below for more information.

3. An evaluation of impacts to 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.

Mitigation Measures for Project Impacts to Biological Resources

The DEIR should identify mitigation measures and alternatives that are appropriate and adequate to avoid or minimize potential impacts, to the extent feasible. The County of Riverside 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, such as Peninsular bighorn sheep (*Ovis canadensis nelsoni*) and southern California ringtail (*Bassariscus astutus octavu*), may not be taken or possessed at any time and no licenses or permits may be issued for their take except as follows:

    - Take is for necessary scientific research,
    - Efforts to recover a fully protected, endangered, or threatened species,
    - Live capture and relocation of a bird species for the protection of livestock, or
    - They are a covered species whose conservation and management is provided for in a Natural Community Conservation Plan (Fish & G. Code, §§ 3511, 4700, 5050, & 5515).

    Specified types of infrastructure projects may be eligible for an incidental take permit for unavoidable impacts to fully protected species if certain conditions are met (see Fish & G. Code §2081.15). Project proponents should consult with CDFW early in the project planning process.

    Project activities described in the DEIR should generally 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 County of Riverside 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 have the potential or have been documented to occur within or adjacent to the Project area, including, but not limited to: American badger (*Taxidea taxus*), coastal California gnatcatcher (*Polioptila californica californica*), loggerhead shrike (*Lanius ludovicianus*), southern California legless lizard (*Anniella stebbinsi*), San Diego desert woodrat (*Neotoma lepida intermedia*), and Los Angeles pocket mouse (*Perognathus longimembris brevinasus*).

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. *City* 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 except as provided by the rules and regulations adopted by the Secretary of the Interior under provisions of the Migratory Bird Treaty Act of 1918, as amended (16 U.S.C. § 703 et seq.).

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 (e.g., conducting work outside the peak nesting season), 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. CDFW recommends that disturbance of occupied nests of migratory birds and raptors within the Project site and surrounding area be avoided any time birds are nesting on-site. CDFW therefore recommends the completion of nesting bird surveys *regardless of the time of year* to ensure compliance with all applicable laws pertaining to nesting and migratory birds.

7. *Moving out of Harm's Way:* To avoid direct mortality to any non-listed terrestrial wildlife, 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 inspect the Project area prior to any Project activities. Any individuals found shall not be harassed and shall be allowed to leave the Project area unharmed. If needed, a qualified biologist may guide, handle, or capture an individual non-listed, non–fully protected wildlife species to move it to a nearby safe location within nearby refugium, or it shall be allowed to leave the Project site of its own volition. Capture methods may include hand, dip net, lizard lasso, snake tongs and snake hook. If the wildlife species is discovered or is caught in any pits, ditches, or other types of excavations, the qualified biologist shall release it into the most suitable habitat near the site of capture. Movement of wildlife out of harm's way should be limited to only those individuals that would otherwise by injured or killed, and individuals should be moved only as far a necessary to ensure their safety (i.e., CDFW does not recommend relocation to other areas). Only biologists with appropriate authorization by CDFW shall move CESA-listed species. 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; unless this Project is proposed to be a covered activity under the CVMSHCP. 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. CDFW must comply with CEQA for issuance of a CESA ITP. CDFW therefore recommends that the DEIR addresses all Project impacts to listed species and specify a mitigation monitoring and reporting program that will meet the requirements of CESA.

Based on review of CNDDB and Biogeographic Information and Observation System (BIOS), and/or knowledge of the project site/vicinity/general area, CDFW is aware that the following CESA-listed species have the potential to occur onsite/have previously been reported onsite: desert tortoise (*Gopherus agassizii*), and least Bell's vireo (*Vireo bellii pusillus*).

Coachella Valley Multiple Species Habitat Conservation Plan

Within the Inland Deserts Region, CDFW issued Natural Community Conservation Plan Approval and Take Authorization for the CVMSHCP per Section 2800, *et seq*., of the California Fish and Game Code on September 9, 2008. The CVMSHCP 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 CVMSHCP, 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 CVMSHCP as a result of this Project is necessary to address CEQA requirements. To obtain additional information regarding the CVMSHCP please go to: http://www.cvmshcp.org/.

The proposed Project occurs within the CVMSHCP area and is subject to the provisions and policies of the CVMSHCP. In order to be considered a covered activity, Permittees should

demonstrate that proposed actions are consistent with the CVMSHCP and its associated Implementing Agreement. The County of Riverside is the Lead Agency and is signatory to the Implementing Agreement of the CVMSHCP. The project is located within the Cabazon Conservation Area. The Conservation Objectives and Required Measures, and discussion of Essential Ecological Processes and Biological Corridors and Linkages, for Cabazon Conservation Area are included in Section 4.3.1 of the CVMSHCP. Because the proposed Project and/or future development projects within the Project area are located within a Conservation Area, they may be subject to the Joint Project Review (JPR) process through the Coachella Valley Conservation Commission (CVCC). The proposed Project, and future development projects within the Project area, will need to demonstrate consistency with the Conservation Objectives and Required Measures (as identified in CVMSHP Section 4.3.1), and address Required Avoidance, Minimization, and Mitigation Measures (CVMSHCP Section 4.4), and Land Use Adjacency Guidelines (CVMSHCP Section 4.5).

The Project may conflict with CVMSHCP requirements regarding fluvial sand transport. A significant portion of Project area is located within the Cabazon Conservation Area, with its associated Conservation Objectives and Required Measures outlined in Section 4.3.1 of the CVMSHCP. Regarding the portion of the Project area that overlap within the Cabazon Conservation Area, there are approximately 2,630 acres of areas identified in the CVMSHCP as Fluvial Sand Transport Areas—Essential Ecological Process areas that are critical in supporting dune-dependent Covered Species in Coachella Valley. One of the applicable Required Measures for this Conservation Area is that "Conservation of the identified fluvial sand transport process areas will be achieved through application of the general plan land use designations and policies" (CVMSHCP page 4-22). The Project proposes changes in zoning and land uses that may conflict with requirements and Permittee obligations under the CVMSHCP to ensure fluvial sand transport is maintained in the Fluvial Sand Transport Areas.

The Project may conflict with CVMSHCP requirements regarding biological corridors. The Project area also includes a significant portion of the Fornat Wash Biological Corridor, which is discussed in CVMSHCP Section 4.3.1. The Fornat Wash Biological Corridor extends one mile from the Fornat Wash culvert under the I-10 freeway on both the north and south sides of the I-10 freeway (excluding areas within the Morongo Indian Reservation). CDFW recommends a Project design (general plan amendment) that is consistent with the County of Riverside's obligations as a CVMSHCP Permittee to maintain both fluvial sand transport processes and functional biological corridors under the I-10 freeway. The DEIR should include a discussion of both direct and indirect impacts to essential ecological processes, wildlife movement, and connectivity, including maintenance of wildlife corridor/movement areas to adjacent undisturbed habitats.

Regardless of whether take of threatened and/or endangered species is obtained through the CVMSHCP or through a CESA ITP, the DEIR needs to address how the proposed Project will affect the conservation objectives of the CVMSHCP. Therefore, all surveys required by the

CVMSHCP to determine consistency should be conducted and results included in the DEIR so that CDFW can adequately assess whether the Project will impact the CVMSHCP.

CDFW Lake and Streambed Alteration Program

Based on review of material submitted with the NOP and review of aerial photography, the Project area includes both large ephemeral streams including the San Gorgonio Wash and Fornat Wash and numerous smaller ephemeral streams. Depending on how the Project is designed and constructed, it is likely that the Project applicant will need to notify CDFW per Fish and Game Code section 1602. Fish and Game Code section 1602 requires an entity to notify CDFW prior to commencing any activity that may do one or more of the following: Substantially divert or obstruct the natural flow of any river, stream or lake; Substantially change or use any material from the bed, channel or bank of any river, stream, or lake; or Deposit debris, waste or other materials that could pass into any river, stream or lake. Please note that "any river, stream or lake" includes those that are episodic (i.e., those that are dry for periods of time) as well as those that are perennial (i.e., those that flow year-round). This includes ephemeral streams, desert washes, and watercourses with a subsurface flow.

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

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

ADDITIONAL COMMENTS AND RECOMMENDATIONS

Landscaping

To ameliorate the water demands of this Project, CDFW recommends incorporation of water-wise concepts in any 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. Information on drought-tolerant landscaping and water-efficient irrigation systems is available on California's Save our Water website: https://saveourwater.com/. CDFW also recommends that the DEIR include recommendations regarding landscaping from Section 4.0 of the CVMSHCP "Table 4-112: Coachella Valley Native Plants Recommended for Landscaping" (pp. 4-180 to 4-182; https://cvmshcp.org/plan-documents/).

Construction Noise

Project-related construction has the potential to generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project. CDFW recommends that the DEIR include an analysis of impacts to wildlife from Project-related construction noise, and appropriate avoidance, minimization, and mitigation measures that will reduce impacts to less than significant.

Construction may result in substantial noise through road use, equipment, and other Project-related activities. This may adversely affect wildlife species in several ways as wildlife responses to noise can occur at exposure levels of only 55 to 60 dB[4]. Anthropogenic noise can disrupt the communication of many wildlife species including frogs, birds, and bats[5,6,7,8]. Noise can also affect predator-prey relationships as many nocturnal animals such as bats and owls primarily use auditory cures (i.e., hearing) to hunt. Additionally, many prey species increase their vigilance behavior when exposed to noise because they need to rely more on visual detection of predators when auditory cues may be masked by noise[9,10]. Noise has also been shown to reduce the density of nesting birds[11] and cause increased stress that results in decreased immune responses[12]. The County of Riverside should include measures in the DEIR to ensure the following: restricting the use of equipment to hours least likely to disrupt wildlife (e.g., not at night or in early morning); restricting the use of generators except for temporary

[4] Barber, J. R., K. R. Crooks, and K. M. Fristrup. 2009. The costs of chronic noise exposure for terrestrial organisms. Trends in Ecology and Evolution 25:180-189.
[5] Sun, J. W. C., and P. M. Narins. 2005. Anthropogenic sounds differentially affect amphibian call rate. Biological Conservation 121:419–427.
[6] Patricelli, G., and J. J. L. Blickley. 2006. Avian communication in urban noise: causes and consequences of vocal adjustment. Auk 123:639–649.
[7] Gillam, E. H., and G. F. McCracken. 2007. Variability in the echolocation of *Tadarida brasiliensis*: effects of geography and local acoustic environment. Animal Behaviour 74:277–286.
[8] Slabbekoorn, H., and E. A. P. Ripmeester. 2008. Birdsong and anthropogenic noise: Implications and applications for conservation. Molecular Ecology 17:72–83.
[9] Rabin, L. A., R. G. Coss, and D. H. Owings. 2006. The effects of wind turbines on antipredator behavior in California ground squirrels (*Spermophilus beecheyi*). Biological Conservation 131:410–420.
[10] Quinn, J. L., M. J. Whittingham, S. J. Butler, W. Cresswell, J. L. Quinn, M. J. Whittingham, S. J. Butler, W. Cresswell, and W. Noise. 2017. Noise, predation risk compensation and vigilance in the chaffinch Fringilla coelebs. Journal of Avian Biology 37:601–608.
[11] Francis, C. D., C. P. Ortega, and A. Cruz. 2009. Noise pollution changes avian communities and species interactions. Current Biology 19:1415–1419.
[12] Kight, C. R., and J. P. Swaddle. 2011. How and why environmental noise impacts animals: An integrative, mechanistic review. Ecology Letters 14:1052–1061.

use in emergencies; provide power to sites by solar PV (photovoltaic) systems, cogeneration systems (natural gas generator), small micro-hydroelectric systems, or small wind turbine systems; ensure the use of noise suppression devices such as mufflers or enclosure for generators; and sounds generated from any means must be below the 55-60 dB range within 50-feet from the source.

Artificial Nighttime Lighting

The Project will introduce new sources of artificial lighting. CDFW recommends that the DEIR include lighting design specifications for all artificial nighttime lighting that will be used by the Project, an analysis of the direct and indirect impacts of artificial nighttime lighting on biological resources, and appropriate avoidance, minimization, and mitigation measures that will reduce impacts to less than significant. The direct and indirect impacts of artificial nighttime lighting on biological resources including migratory birds that fly at night, bats, and other nocturnal and crepuscular wildlife should be analyzed, and appropriate avoidance and minimization measures should be included in the DEIR.

Artificial nighttime lighting often results in light pollution, which has the potential to significantly and adversely affect fish and wildlife. Artificial lighting alters ecological processes including, but not limited to, the temporal niches of species; the repair and recovery of physiological function; the measurement of time through interference with the detection of circadian and lunar and seasonal cycles; the detection of resources and natural enemies; and navigation[13]. Many species use photoperiod cues for communication (e.g., bird song[14]), determining when to begin foraging[15], behavioral thermoregulation[16], and migration[17]. Phototaxis, a phenomenon that results in attraction and movement towards light, can disorient, entrap, and temporarily blind wildlife species that experience it[8]. The County of Riverside should include measures in the DEIR to ensure the following: eliminate all nonessential lighting throughout the Project area; avoid or limit the use of artificial light during the hours of dawn and dusk when many wildlife species are most active; lighting for Project activities is fully shielded, cast downward, reduced in intensity to the greatest extent, and does not result in spill over onto other properties or upward into the night sky (see the International Dark-Sky Association standards at http://darksky.org/); the use of LED lighting with a correlated color temperature of 3,000 Kelvins or less; proper disposal of hazardous waste; and recycling of lighting that contains toxic compounds with a qualified recycler.

Sand-Dependent Covered Species

[13] Gatson, K. J., Bennie, J., Davies, T., Hopkins, J. 2013. The ecological impacts of nighttime light pollution: a mechanistic appraisal. Biological Reviews, 88.4: 912-927.
[14] Miller, M. W. 2006. Apparent effects of light pollution on singing behavior of American robins. The Condor 108:130–139.
[15] Stone, E. L., G. Jones, and S. Harris. 2009. Street lighting disturbs commuting bats. Current Biology 19:1123–1127.
[16] Beiswenger, R. E. 1977. Diet patterns of aggregative behavior in tadpoles of *Bufo americanus*, in relation to light and temperature. Ecology 58:98–108.
[17] Longcore, T., and C. Rich. 2004. Ecological light pollution - Review. Frontiers in Ecology and the Environment 2:191–198.

With regard to obligations of Local Permittees, Section 6.6.1 of the CVMSHCP indicates that "within and outside conservation areas, on parcels approved for development, the Permittees shall encourage the opportunity to salvage Covered sand-dependent species". The surface substrate on the Project site is composed mainly of wind-blown, fine-grained sand. This type of substrate has the potential to be occupied by several Covered Species under the CVMSHCP that are sand-dependent, including Palm Springs pocket mouse (*Perognathus longimembris bangsi*), Coachella Valley round-tailed ground squirrel (*Xerospermophilus tereticaudus chlorus*), and Coachella Valley milkvetch (*Astragalus lentiginosus var. coachellae*). An assessment of biological resources is recommended by CDFW to determine whether these or other send-dependent species are present on the Project site. The County of Riverside should include measures in the DEIR to prepare and submit to the California Department of Fish and Wildlife and the U.S. Fish and Wildlife Service, for review and approval, a plan to salvage sand-dependent CVMSHCP Covered Species within the Project area. The plan shall be prepared by a qualified biologist experienced in surveying for and handling sand-dependent Covered Species. The plan shall include, but not be limited to, the species-specific salvage methods and timing for each sand-dependent Covered Species identified within the Project site and the location(s) where each species will be translocated. Only qualified biologist(s) with appropriate state and federal permits to handle special-status species shall carry out salvage activities.

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 (CNDDB). Information can be submitted online or via completion of the CNDDB field survey form at the following link: https://wildlife.ca.gov/Data/CNDDB/Submitting-Data. The types of information reported to CNDDB can be found at the following link: https://wildlife.ca.gov/Data/CNDDB/Plants-and-Animals.

FILING FEES

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

CONCLUSION

CDFW appreciates the opportunity to comment on the NOP of a DEIR for the Cabazon Infrastructure Plan and Cabazon Community Plan Project (SCH No. 2026030377) and recommends that the County of Riverside address CDFW's comments and concerns in the forthcoming DEIR. Questions regarding this letter or further coordination should be directed to Jacob Skaggs, Senior Environmental Scientist Specialist, at jacob.skaggs@wildlife.ca.gov.

Sincerely,

DocuSigned by:
Kim Freeburn
84F92FFEEFD24C8...

Kim Freeburn
Environmental Program Manager

ec: Heather Brashear, Senior Environmental Scientist (Supervisor), CDFW
Heather.Brashear@wildlife.ca.gov

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

From: TLMA Cabazon Plan
To: Stanley, Christopher
Subject: RE: Cabazon Community Plan
Date: Tuesday, March 24, 2026 9:57:24 AM

Good Morning Christopher,

Thank you for contacting us for further information about the Cabazon Community Plan. To clarify, the Cabazon Community Plan is still under preparation. We are currently in the scoping session and receiving input from the public. The email below is referring to the updated proposed Land Use map and housing density map which can be viewed using the link below. The land use map would be the most helpful for you to consider the appropriate location for your nonprofit agency's purpose.

We also have two additional open house sessions planned at the James A Venable Community Center in the upcoming months.

https://planning.rctlma.org/cabazon-community-plan#2741959481-2213170283

Please contact me if you have any questions. Thank you!

Candice Hughes
District 05 Principal Planner
Transportation and Land Management Agency - Planning
4080 Lemon Street 12th Floor
Riverside, CA 92501
951-955-1639

From: Stanley, Christopher <CSTANLEY@sbu.edu>
Sent: Monday, March 23, 2026 12:00 PM
To: TLMA Cabazon Plan <CabazonPlan@rivco.org>
Cc: Marshalian, Richard <RMarshalian@Rivco.org>
Subject: Cabazon Community Plan

I work with a Banning nonprofit called Faith in Action of the San Gorgonio Pass, and I've been receiving these messages from you about a plan for developing the Cabazon area to hold more housing and businesses. Our director participated in one of these sessions due to her interest in Cabazon, but she's missed the ones since then.

I didn't realize until seeing the announcement below that you were as far along as you appear to be in developing this plan. I'm not finding where I've received a copy of the "Cabazon Community Plan" that's referenced in this document.

Can you send me a copy? We've identified a grant opportunity that could give us up to $250,000 for a project in Cabazon, but we want to make sure that we're not duplicating or conflicting with what the county has planned for that area.

Thanks,

Chris Stanley, Grant Specialist
Faith in Action of the San Gorgonio Pass

From: TLMA Cabazon Plan <CabazonPlan@rivco.org>
Sent: Thursday, March 5, 2026 11:18 AM
To: TLMA Cabazon Plan <CabazonPlan@rivco.org>
Subject: Cabazon Community Plan (GPA01206) Planning Commission Scoping Meeting – Wednesday, March 18, 2026

You don't often get email from cabazonplan@rivco.org. Learn why this is important

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good morning,

The Riverside County Planning Department invites you to participate in the upcoming Scoping Session for the Programmatic Environmental Impact Report (PEIR) of the Cabazon Community Plan at the Riverside County Planning Commission on **Wednesday, March 18, 2026.**

Date: Wednesday, March 18, 2026
Time: 9:00 a.m. or as soon as possible thereafter
Location: 4080 Lemon Street, 12th Floor, Riverside, CA 92501
Meeting Information: https://planning.rctlma.org/planning-commission-meetings

Additional materials for your reference can be downloaded and reviewed at the Cabazon Community Plan website at: https://planning.rctlma.org/cabazon-community-plan

Sincerely,

RIVERSIDE COUNTY TLMA-PLANNING DEPARTMENT
4080 Lemon Street, 12th Floor, Riverside, CA 92501
Ph: 951-955-3200
CabazonPlan@rivco.org



Confidentiality Disclaimer

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

County of Riverside California

COACHELLA VALLEY CONSERVATION COMMISSION

Cathedral City • Coachella • Desert Hot Springs • Indian Wells • Indio • La Quinta • Palm Desert • Palm Springs
Rancho Mirage • County of Riverside • Coachella Valley Water District • Imperial Irrigation District
Mission Springs Water District

April 8, 2026

Candice Hughes
District 5 Principal Planner
Riverside County Transportation and Land Management Agency
4080 Lemon Street, 12th Floor
Riverside, CA 92502

RE: Comments on the Notice of Preparation for the Cabazon Community Plan

Dear Candice Hughes:

The Coachella Valley Conservation Commission (CVCC) has received the County of Riverside's (County) Notice of Preparation (NOP) of a Draft Program Environmental Impact Report (EIR) and Notice of EIR Scoping Meetings for the Cabazon Infrastructure Plan and Cabazon Community Plan Project (Project). CVCC is a joint powers authority tasked with implementing and administering the Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP), to which the County is a permittee. The CVMSHCP balances conservation of the area's unique natural resources with economic growth and urban development. It provides incidental take coverage to permitted projects within the urbanized parts of the Coachella Valley in exchange for the acquisition and perpetual conservation of natural lands in ecologically critical regions designated as Conservation Areas.

The NOP indicates that the Project would consist of the implementation of the Cabazon Community Plan and a corresponding Cabazon Infrastructure Plan prepared in accordance with the County's 6th Cycle Housing Element Action H-27. The County's housing obligations under the Regional Housing Needs Assessment suggest that the Cabazon area, situated immediately east of the City of Banning in the San Gorgonio Pass, may need to accommodate up to 25,000 new homes over the next 30 years, and will require significant infrastructure to support the anticipated growth. Proposed land uses include variable density residential, commercial, industrial, and mixed-use, among others.

With the exception of its westernmost section, the Project falls entirely within the CVMSHCP boundary, and its implementation is thus subject to the terms and conditions of the CVMSHCP, its state and federal permits, and the Implementing Agreement (IA). Significant portions of the Project also fall within the Cabazon Conservation Area, which imposes specific responsibilities around land use planning, development permitting, and habitat conservation. CVCC acknowledges that the adoption of land use planning documents like a community plan remains the sole discretion of the County and does not require amendments to the CVMSHCP or IA, or approval of other CVMSHCP permittees, but reiterates that the adoption of such documents cannot lessen the County's obligations under the CVMSHCP, and further that the approval of projects inconsistent with the CVMSHCP, regardless of their adherence to County policy, may result in the revocation or suspension of the CVMSHCP permits (CVMSHCP 6.12.1, IA 20.2).

The Cabazon Conservation Area consists of the San Gorgonio River channel and its tributaries, which function as a fluvial sand transport system to move sand generated in the San Jacinto Mountains and San Bernardino Mountains downstream into the Coachella Valley where it can be picked up by aeolian systems to supplement the dune habitat required by many of the CVMSHCP's covered species

(CVMSHCP 4.3.1). While there is covered species habitat in the Conservation Area, most of this is of low quality due to fragmentation and edge effects from existing development. The Conservation Area also provides wildlife connectivity between the San Jacinto Mountains to the south and the San Bernardino Mountains to the north through an undercrossing beneath Interstate 10 (I-10) at Fornat Wash. Due to the degraded quality of the existing habitat, conservation objectives within the Cabazon Conservation Area are met primarily through maintenance of fluvial sand transport processes and biological connectivity rather than preservation of acres.

The CVMSHCP identifies three criteria to adequately demonstrate that fluvial sand transport capacity is being maintained: (1) natural flows onto a parcel are not impeded by any proposed development and are conveyed offsite in the natural pre-disturbance direction of flow, (2) floodwaters and water-borne sediments are not artificially retained onsite, and (3) flow concentration onsite and flow velocity offsite are minimized to prevent downstream scour and erosion (CVMSHCP 4.2.2.2.4, 4.3.1). Because there are no acreage-based conservation objectives in these fluvial sand transport corridors, the CVMSHCP asserts that fluvial sand transport maintenance will be achieved through general plan land use designations and policies. It is therefore critical that the Project demonstrate how it intends to maintain fluvial sand transport through the area given the land uses proposed.

Based on an approximate overlay of the CVMSHCP's fluvial sand transport corridor with the proposed land use designations, it appears that the following land uses may fall within the fluvial sand transport corridor: heavy industrial, light industrial, commercial retail, highest density residential, medium density residential, low density residential, very low density residential, rural residential, rural desert, and mixed use area. The residential densities range from one dwelling unit per 10 acres to as high as 40 dwelling units per acre; floor area ratios for non-residential uses range from 15% to 60% of the total lot size (Riverside County General Plan). It is not immediately apparent that these land use designations have been distributed across the fluvial sand transport corridor in such a fashion as to allow sand to move through the system unimpeded, or if any additional land use policies will be implemented to ensure that site configuration and/or structure design will ensure the continued transport of sand through the Conservation Area.

As traditionally implemented, fluvial sand transport capacity is assessed during the Joint Project Review (JPR) process that is required for any project seeking take authorization within a CVMSCHP Conservation Area (CVMSHCP 6.6.1, IA 13.2(F)). However, project-by-project reviews in this instance may prove insufficient to ensure adequate fluvial sand transport over time, where each individual project's impact on fluvial sand transport is minimal, but in aggregate, can serve to drastically reduce the Conservation Area's capacity to provide sand to downstream habitat. Such a "tipping point" scenario may also preclude future development, where the buildout of any single future project would so restrict fluvial sand transport capacity as to be render all future projects inconsistent with the CVMSHCP.

In light of the above, CVCC recommends that the County undertake the following actions over the course of its environmental impact analysis to ensure the Project maintains fluvial sand transport capacity through the Cabazon Conservation Area in accordance with the conservation objectives of the CVMSCHP:

1. Identification of Project alternatives at various land use densities. In addition to the land uses proposed in the NOP, CVCC recommends analyzing a range of alternatives that contemplate lower densities within the fluvial sand transport corridor, including at least one alternative that identifies the lowest possible development density while still meeting Project objectives. While CVCC's preference is to see the entire Conservation Area remain as open space, it acknowledges

that this may not meet Project objectives. Nonetheless, an open space designation would most directly address the conservation objectives of the CVMSHCP.

2. Hydrologic modeling of viable Project alternatives to demonstrate fluvial sand transport capacity. Modeled scenarios should contemplate full buildout of the community and infrastructure plan alternatives to identify where the anticipated level of development may result in the degradation of fluvial sand transport. Results may inform where the proposed development density should be reduced or where specific site planning standards may be required.

The CVMSHCP does allow for the construction of flood control structures as an alternative to meeting the abovementioned criteria, provided the structure does not reduce sand transport capacity (CVMSHCP 4.2.2.2.4). The recommended modeling may also provide insight as to whether such a structure(s) need be included in the infrastructure plan, and where it might be most effectively deployed. CVCC would note that the use of a flood control structure(s) as an alternative to land use designations would require a minor amendment to the CVMSHCP, and would be subject to concurrence by the US Fish and Wildlife Service and the California Department of Fish and Wildlife.

In addition to fluvial sand transport, conservation objectives for the Cabazon Conservation Area include the maintenance of Fornat Wash as a functional biological corridor (CVMSHCP 4.3.1). While the proposed land use map included in the NOP identifies the portion of the Project that includes Fornat Wash as conservation land, the land immediately to the west appears to be designated as light industrial. As with any development taking place adjacent to, or within, a Conservation Area, any industrial development permitted in this portion of the Project will be subject to the CVMSHCP's land use adjacency guidelines (CVMSHCP 4.5, IA 13.2(A)). However, special consideration should be given to light and noise generated by any industrial development in this section, given its proximity to the Fornat Wash biological corridor. Ongoing research by CVCC assessing corridor functionality along I-10 has indicated that noise and light are major deterrents to undercrossing use by wildlife (Lemieux; results are expected to be publicly available in summer 2026). Industrial facilities commonly operate round-the-clock, and can generate truck traffic at all hours, often at levels that exceed the 75 dBA hourly threshold established by the land use adjacency guidelines (Hastings).

CVCC recommends the County undertake noise and light quantification studies adjacent to the Fornat Wash biological corridor to determine whether industrial development is feasible in light of the CVMSHCP's land use adjacency guidelines. CVCC would note that these guidelines may also impact industrial development in the western portion of the Project, which is proposed to contain extensive light industrial and heavy industrial land use designations. The County would do well to consider the cumulative noise and light impacts on the surrounding Conservation Area in a full buildout scenario, and adjust the land use designations to a lower impact designation as appropriate.

Conservation within the Cabazon Conservation Area relies extensively on the implementation of land use designations and policies consistent with the CVMSHCP. To that end, CVCC recommends that the Project include explicit policies, where relevant, pertaining to adherence to the JPR process; incorporation of the avoidance, minimization, and mitigation measures described in the CVMSHCP ; incorporation of the land use adjacency guidelines; and additional specific policies that may arise out of the above recommended studies. This will serve to provide clarity to future developers regarding design expectations and required measures to achieve consistency with the CVMSHCP throughout the life of the community plan.

CVCC is available to assist the County throughout the Project in providing guidance on CVMSHCP requirements, structuring studies and analyzing results, providing input on policy language to ensure

CVMSHCP consistency, and for any other component of the Project that may have a connection to the CVMSHCP. If you have any questions, please do not hesitate to reach out to Peter Satin, Conservation Program Manager, by phone at 760.346.1127, or by email at psatin@cvag.org.

Sincerely,



Peter Satin
Conservation Program Manager

Works Referenced

Coachella Valley Association of Governments. 2016. Final Major Amendment to the Coachella Valley Multiple Species Habitat Conservation Plan. https://cvmshcp.org/plan-documents/. Accessed April 2026.

Hastings, Aaron L. 2019. Traffic Noise Model 3.0: Technical Manual. United States. Federal Highway Administration. Office of Natural Environment. https://rosap.ntl.bts.gov/view/dot/48763. Accessed April 2026.

Lemieux. S, et al. Unpublished. Banning Pass Wildlife Connectivity across I-10. Coachella Valley Conservation Commission.

Riverside County. 2021. Riverside County General Plan – The Pass Area Plan. https://planning.rctlma.org/riverside-county-general-plan. Accessed April 2026.

From: Jill Mccormick
To: TLMA Cabazon Plan
Subject: GPA No 01206 and ZR6234
Date: Tuesday, March 24, 2026 12:56:29 PM
Attachments: Outlook-fe4iphx5.png

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

Good afternoon,

This email is to inform you that the Historic Preservation Office of the Ft. Yuma Quechan Tribe does not wish to provide comments on this project. We defer to the local Tribes and support their determinations on this matter. Email correspondence is the preferred method of communication with this office. Hard copies of project letters are not required if an email containing the project documents has been sent to the Historic Preservation Office.

Jill

H. Jill McCormick, M.A.
Historic Preservation Office
Ft. Yuma Quechan Indian Tribe
P.O. Box 1899
Yuma, AZ 85366-1899
Office: 760-919-3631
Cell: 928-920-6521

Jeffrey L. Dickman
65462 Via Del Sol
Desert Hot Springs, CA 92240
March 17, 2026

TO:
Riverside County Planning Commission
Candice Hughes, Principal Planner
CabazonPlan@rivco.org

DATE: March 17, 2026
RE: Notice of Preparation (NOP) and Scoping Comments — Cabazon Community Plan (GPA No. 01206)

To the Honorable Members of the Planning Commission:

Please accept these formal scoping comments pursuant to the California Environmental Quality Act (CEQA), Public Resources Code § 21083.9, and the State CEQA Guidelines § 15082, regarding the Notice of Preparation for the Cabazon Community Plan Program Environmental Impact Report (EIR).

A development of 25,000 residential units and approximately 8,000 acres in the San Gorgonio Pass is not a standard master-planned community. It is the de facto incorporation of a new city in one of the most environmentally sensitive and logistically constrained corridors in Southern California. The Program EIR must move beyond localized project-level analysis and rigorously address the following critical, systemic concerns.

1. Hydrology and Water Security ("Show Me the Water" Mandate)

A 25,000-unit development represents an unprecedented and unquantified shift in water demand within the San Gorgonio Pass and the broader Coachella Valley hydrologic region. The EIR must directly address the following:

- **SB 610/SB 221 Compliance:** The EIR must include a verified Water Supply Assessment (WSA) identifying a physically and legally assured "wet" water source — not speculative future allocations or paper entitlements. No project approval may occur without demonstrated water sufficiency under Water Code § 10910 et seq.
- **Aquifer Sustainability:** The analysis must quantify cumulative impacts of 75,000+ new residents on the Mission Creek and Desert Hot Springs sub-basins. Both basins are already subject to adjudication and strict Groundwater Sustainability Agency (GSA) management under SGMA. The EIR must demonstrate that project water demand will not cause chronic lowering of groundwater levels or land subsidence.
- **Groundwater Recharge Interference:** Converting approximately 8,000 acres of porous Sonoran desert scrub to impermeable surfaces (rooftops, streets, parking) will materially diminish natural groundwater recharge. The EIR must model the long-term annual loss of percolation volume and its effect on basin yield. Mitigation must include quantified on-site infiltration requirements.

- **Drought Resilience:** Given the accelerating multi-year drought cycle in the Colorado River Basin and State Water Project, the EIR must present a Drought Contingency Plan demonstrating that project water sources remain viable in a critically dry year with no State Water Project allocation.

2. Regional Transportation and Interstate 10 Gridlock

The San Gorgonio Pass is a nationally recognized transportation "choke point." Any EIR analysis that treats this corridor as unconstrained is fundamentally flawed.

- **VMT and Greenhouse Gas Emissions (SB 743):** Per SB 743 and CEQA Guidelines § 15064.3, the EIR must analyze Vehicle Miles Traveled (VMT) as the primary transportation metric. Given the near-total absence of employment within the project area, residents will commute long distances to Riverside, San Bernardino, and Los Angeles Counties. The EIR must model project VMT against regional baseline targets and quantify resulting GHG emissions with full life-cycle accounting.
- **Cumulative Traffic Failure:** The I-10 Freeway at the Cabazon Pass already operates at failing or near-failing Levels of Service (LOS) during peak periods, compounded by Cabazon Outlets and Morongo Casino traffic. The EIR must model cumulative impacts of this project's estimated 200,000+ daily vehicle trips against all reasonably foreseeable projects in the Pass.
- **Emergency Evacuation Modeling:** In a wildfire or seismic event, the I-10 is the sole viable evacuation artery for the Pass. The EIR must provide a Quantitative Wildfire and Seismic Evacuation Model that demonstrates 25,000 households can safely egress within protective action timelines. A qualitative narrative is legally insufficient under CEQA. Cal Fire and Caltrans District 8 should be designated as Responsible Agencies.
- **Active and Multimodal Transportation:** The EIR must evaluate feasibility of a commuter rail connection to the Metrolink San Bernardino Line and assess whether the project design encourages or structurally precludes transit-oriented development. A project of this scale that generates no viable transit mode shift is inconsistent with the State's climate goals.

3. Biological Integrity and Habitat Fragmentation

The project site occupies an ecologically irreplaceable transitional landscape bridging the San Bernardino and San Jacinto Mountain ranges.

- **CVMSHCP Consistency:** The EIR must provide a detailed analysis of the project's consistency with the Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP) and the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP). Any take authorization must be explicitly conditioned on full mitigation and fee payment.
- **Wildlife Movement Corridors:** Development at this scale risks permanently severing movement corridors for state- and federally-listed species. We demand a multi-season, peer-reviewed Movement Corridor Study addressing Peninsular Bighorn Sheep (*Ovis canadensis cremnobates*, listed under ESA) and Desert Tortoise (*Gopherus agassizii*, Threatened). Mitigation must include enforceable wildlife underpasses, not aspirational design standards.
- **Sensitive Plant Communities:** The EIR must conduct and disclose a comprehensive survey of Creosote Bush Scrub, Mojave Mixed Woody Scrub, and Alkali Sink

communities within the project footprint, consistent with CDFW vegetation mapping protocols.

- **Night Sky / Light Pollution:** Urbanization of this corridor will produce a significant light dome visible from Joshua Tree National Park and Anza-Borrego Desert State Park. The EIR must analyze impacts on nocturnal wildlife behavior and Dark Sky resources consistent with International Dark-Sky Association standards.

4. ★ The Gateway Precedent and Aesthetic / Cultural Impact

Cabazon serves as the iconic "Gateway to the Coachella Valley" — a designation with genuine economic, cultural, and aesthetic significance to the region and the State.

- **Visual Resource Analysis (CEQA Guidelines § 15126.4):** The project would replace open desert vistas — which define the visual and psychological transition into the Coachella Valley — with 12 square miles of dense suburban rooftops and infrastructure. The EIR must conduct a Visual Impact Assessment using photosimulations from key viewpoints on I-10, SR-111, and adjacent public lands. The permanent loss of this geographic and visual boundary constitutes a potentially significant aesthetic impact under CEQA.
- **Fugitive Dust (PM10/PM2.5) — Public Health Hazard:** Mass-scale grading of 8,000 acres in the San Gorgonio Pass — one of the highest-velocity wind corridors in the continental United States — poses a severe and acute public health risk from fugitive dust. The EIR must include a phased Dust Mitigation Plan demonstrating effectiveness during the 60+ mph wind events that are common in the Pass, consistent with South Coast AQMD Rule 403. Failure to adequately mitigate PM2.5 emissions constitutes a health risk significant enough to independently justify a reduced-footprint alternative.
- **Noise and Vibration Impacts:** The decades-long construction program associated with a 25,000-unit buildout will generate sustained noise and vibration impacts on existing Cabazon residents, Morongo Band of Mission Indians tribal lands, and adjacent communities. The EIR must include a Construction Noise Management Plan with enforceable dBA thresholds and monitoring requirements.

5. Infrastructure Sequencing, Fiscal Impact, and Public Safety

- **Public Services Concurrency:** Cabazon currently lacks the fire suppression, law enforcement, emergency medical, and K–12 school infrastructure necessary to serve a city of 75,000. The EIR must include a phased Public Services and Facilities Plan demonstrating that critical services will be constructed concurrently with, not subsequent to, residential occupancy. Developer impact fees and financing mechanisms must be identified and secured.
- **Wastewater Treatment and Disposal:** The EIR must identify the specific wastewater treatment facility (existing or proposed) with sufficient permitted capacity to serve the project at full buildout, along with conveyance infrastructure and effluent disposal methods. Vague references to "future regional infrastructure" are legally insufficient.
- **Solid Waste:** The EIR must quantify solid waste generation at buildout and identify a permitted disposal facility with adequate remaining capacity, consistent with the County Integrated Waste Management Plan and AB 939.
- **Energy and Grid Reliability:** The EIR must address electrical grid capacity, the need for new transmission infrastructure, and the project's consistency with Title 24 and the State's clean energy mandates. In a region subject to extreme heat events and grid

stress, the EIR must evaluate the risk of power outages and identify resilience measures.

- **Fiscal Impact Analysis:** The EIR must include or incorporate a Fiscal Impact Analysis demonstrating that recurring public service costs generated by the project will be fully offset by project-generated revenues, and will not impose an unreimbursed fiscal burden on Riverside County taxpayers.

Formal Requests

I formally request that the Planning Commission mandate the following alternatives be analyzed in the Draft EIR, consistent with CEQA Guidelines § 15126.6:

- **A Reduced Density Alternative** that analyzes a substantially lower unit count consistent with demonstrated water supply and infrastructure capacity;
- **A Phased Development Alternative** that conditions each phase of construction on verified completion of supporting infrastructure; and
- **A No Project / Existing General Plan Alternative** as required by CEQA Guidelines § 15126.6(e).

Please include my name and address on the distribution list for all future CEQA notices, Draft EIR release announcements, and public hearing notices related to GPA No. 01206.

Respectfully Submitted,



Jeffrey L. Dickman
65462 Via Del Sol
Desert Hot Springs, CA 92240

From: TLMA Cabazon Plan
To: judydeertrack@gmail.com
Subject: RE: Cabazon Community Plan / Cabazon Infrastructure Plan / Public Record Request
Date: Monday, March 16, 2026 9:28:00 AM
Attachments: 4019 - GPIP FC - GPA No. 1206.pdf
FC GPA 1206 GPAC Staff Report.pdf

Good Morning Judy,

Thank you for expressing interest in the Cabazon Community Plan and Cabazon Infrastructure Plan. The responses to your questions are in RED below.

1. General Plan Amendment – The General Plan Amendment was initiated and adopted to begin the application by the Board of Supervisors on April 18, 2017. The staff report and approval are attached.

2. Any rezone actions, applications, or determinations – no rezone actions or determinations have been performed. GPA01206 initiated the application of the 30-year Cabazon Community Plan (CCP) is the applications for the zone and land use changes. The Cabazon Infrastructure Plan (CIP) is the application for the necessary infrastructures. The application is viewable on the Planning Commission website.
   https://riversidecountyca.iqm2.com/Citizens/Detail_LegiFile.aspx?Frame=&MeetingID=3390&MediaPosition=&ID=29997&CssClass=

3. Any developer applications, if applicable; There are no developer applications at this time. The 30-year Cabazon Community Plan (CCP) is the applications for the zone and land use changes. The Cabazon Infrastructure Plan (CIP) is the application for the necessary infrastructures. Any future applications and entitlements for construction of the Community Plan and Infrastructure Plan will need to submit applications for the entitlement process after the CCP and CIP have been approved by the Board of Supervisors.

4. Any other permit filings; There are no permit filings at this time. See above.

5. Staff reports, if any, to date; The Staff Report for GPA01206 is attached. The Staff Report for the CCP and CIP is available on the above website link.

6. Written Responses from Trustee or Responsible Agencies – The CCP and CIP is currently under public scoping to the general public and agencies. The scoping period ends on April 18, 2026.

Please contact me if you have any questions. Thank you!

Candice Hughes
District 05 Principal Planner
Transportation and Land Management Agency - Planning
4080 Lemon Street 12th Floor
Riverside, CA 92501
951-955-1639

From: Judy Deertrack <judydeertrack@gmail.com>
Sent: Friday, March 13, 2026 3:04 PM
To: TLMA Cabazon Plan <CabazonPlan@rivco.org>
Subject: Cabazon Community Plan / Cabazon Infrastructure Plan / Public Record Request

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

County of Riverside
Attn: Candice Hughes

Re: Public Record Request / Cabazon Community Plan
Dear Candice,

On the above action, may I have as quickly as possible, considering the hearing is next Wednesday a copy of the following from your file:

(1) General Plan Amendment;
(2) Any rezone actions, applications, or determinations;
(3) Any developer applications, if applicable;
(4) Any other permit filings;
(5) Staff reports, if any, to date;
(6) Written Responses from Trustee or Responsible Agencies.

Thank you.

With regard,

Judy Deertrack
Deertrack Consulting, LLC
760 325 4290

MSWD
Mission Springs Water District

66575 Second Street, Desert Hot Springs, CA 92240 • www.mswd.org • p 760.329.6448 • f 760.329.2482

March 27, 2026

Via electronic mail to: CabazonPlan@ricvo.org

Candice Hughes
County of Riverside
4080 Lemon Street, 12th Floor
Riverside CA 92501

Re: Notice of Preparation of a Draft Environmental Impact Report (EIR) and Notice of EIR Scoping Meeting for the Cabazon Infrastructure Plan and Cabazon Community Plan Project (GPA No. 01206 and ZR634)

Dear Candice Hughes:

Mission Springs Water District (MSWD) is interested in receiving future notifications about the subject project. Additionally, the District would like to understand the scope of the project and understand the potential impacts within our service area.

MSWD would like to have the EIR consider impacts to groundwater resources, drainage, anticipated future development that are currently in the entitlement process etc.

MSWD would like the opportunity to review and comment on the EIR when it is made available.

If we can be of further assistance, please do not hesitate to contact me.

Sincerely,

Eric Weck, P.E.
Engineering Manager
(760) 329-6448 ext. 122
eweck@mswd.org

Docusign Envelope ID: 5CBB8B7C-4DAB-486D-B557-F63E93BAD321

THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA

March 30, 2026 **VIA EMAIL**

Candice Hughes
District 5 Principal Planner
Riverside County Transportation and Land Management Agency
P.O. Box 1409
Riverside, CA 92502
CabazonPlan@rivco.org

Dear Candice Hughes:

Notice of Preparation of a Draft Program Environmental Impact Report
for the Cabazon Infrastructure Plan and Cabazon Community Plan Project

The Metropolitan Water District of Southern California (Metropolitan) has reviewed the Notice of Preparation of a Draft Program Environmental Impact Report (PEIR) for the Cabazon Infrastructure Plan and Cabazon Community Plan (CIPCCP) Project. The proposed project includes the implementation of the Cabazon Community Plan for estimated growth (up to 25,000 new housing units) and corresponding Cabazon Infrastructure Plan for the expansion of essential services to accommodate such growth. The purpose of the CIPCCP is to address land use and infrastructure needs for the unincorporated community of Cabazon in Riverside County for the next 30 years.

Metropolitan owns and operates facilities within and adjacent to the proposed CIPCCP's planning area. As shown on the enclosed location map, Metropolitan's Colorado River Aqueduct (CRA) traverses the planning area from Seminole Drive and Interstate 10 to Esperanza Avenue and Peach Street within Metropolitan fee-owned property and easement rights-of-way (see Enclosure 1). The proposed project area includes Metropolitan's 16-foot-inside-diameter CRA cut-and-cover conduit, San Jacinto Tunnel, San Gorgonio wasteway, adit, appurtenant manhole structures, and accompanying fee property, permanent easement, and tunnel easement. Metropolitan is concerned with potential impacts to facilities and rights-of-way that may result from implementation of the proposed project.

Metropolitan must be allowed to always maintain its rights-of-way and access to facilities to repair and maintain the current condition of those facilities. In order to avoid potential conflicts with Metropolitan's rights-of-way, we require that any design plans for any activity in the area of Metropolitan's pipelines or facilities be submitted for our review and written approval. Metropolitan will not permit procedures that could subject our pipelines and facilities to excessive vehicle, impact, or vibratory loads. Any future design plans associated with the proposed project should be submitted to the attention of Metropolitan's Substructures Team.

Docusign Envelope ID: 5CBB8B7C-4DAB-486D-B557-F63E93BAD321

Approval of future projects should be contingent on Metropolitan's approval of design plans for portions of proposed projects that could impact its facilities.

Metropolitan requests that the County of Riverside avoid any potential impacts that may occur to the CRA and related facilities due to implementation of the proposed project, or, where applicable, propose mitigation measures to offset any potential impacts. It will be necessary for the County of Riverside to consider Metropolitan's CRA and appurtenant facilities in project planning.

Detailed prints of drawings of Metropolitan's pipelines and rights-of-way may be obtained by contacting Metropolitan's Substructures Team at EngineeringSubstructures@mwdh2o.com. To assist the County of Riverside in preparing plans that are compatible with Metropolitan's facilities and rights-of-way, enclosed is a copy of the "Guidelines for Improvements and Construction Projects Proposed in the Area of Metropolitan's Facilities and Rights-of-way" Please note that Metropolitan's facilities and rights-of-way must be fully shown and identified as Metropolitan's on all designs or plans submitted.

Additionally, appropriate property rights must be obtained from Metropolitan for any proposed project activities within Metropolitan's property. The granting of property rights may be subject to Metropolitan's Board of Director's approval. No work shall be conducted, including potholing or any studies within Metropolitan's property, prior to the execution of an appropriate agreement. Please contact Metropolitan's Land Management Unit regarding the process for obtaining access or property rights at RealEstateServices@mwdh2o.com.

We appreciate the opportunity to provide input to your planning process and look forward to receiving future plans and documentation for this Project. If we can be of further assistance, please contact Michael Vamstad at (760) 413-3718 or at mvamstad@mwdh2o.com.

Very truly yours,

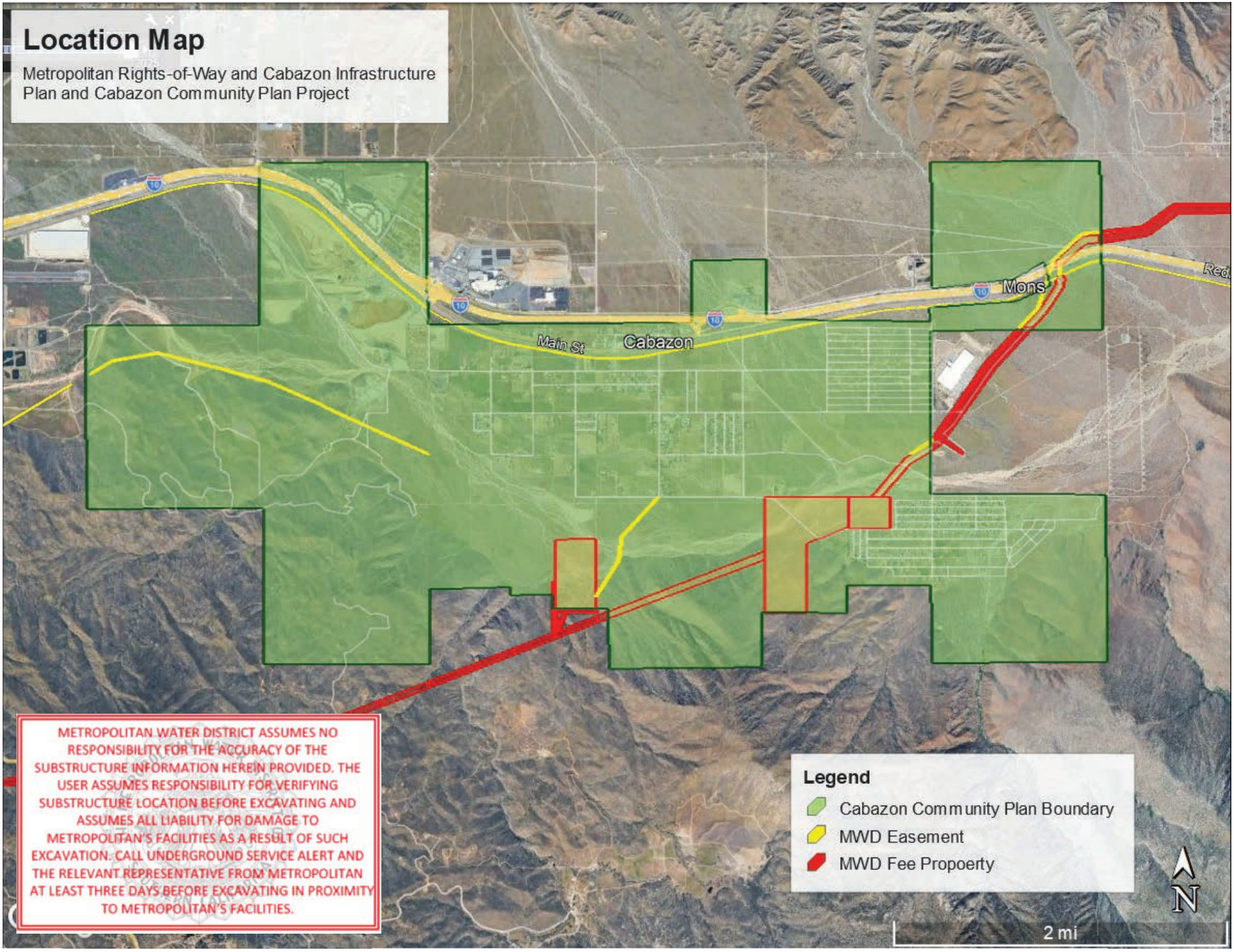
DocuSigned by:
Jennifer Harriger
1C5AACFD98D9493...

Jennifer Harriger
Manager, Environmental Planning Section

MSV: cs
s:\externalreviews\commentletters\2026-commentletters\riverside cip&cabazoncommunityplan_nop

Enclosures (2)

Docusign Envelope ID: 5CBB8B7C-4DAB-486D-B557-F63E93BAD321



Guidelines for Improvements and Construction Projects Proposed in the Area of Metropolitan's Facilities and Rights-of-Way

July 2018

Prepared By:
The Metropolitan Water District of Southern California
Substructures Team, Engineering Services
700 North Alameda Street
Los Angeles, California 90012

Copyright © 2018 by The Metropolitan Water District of Southern California.

Additional Copies: To obtain a copy of this document, please contact the Engineering Services Group, Substructures Team.

Disclaimer

Metropolitan assumes no responsibility for the accuracy of the substructure information herein provided. The user assumes responsibility for verifying substructure locations before excavating and assumes all liability for damage to Metropolitan's facilities as a result of such excavation. Additionally, the user is cautioned to conduct surveys and other field investigations as deemed prudent, to assure that project plans are correct. The appropriate representative from Metropolitan must be contacted at least two working days, before any work activity in proximity to Metropolitan's facilities.

It generally takes 30 days to review project plans and provide written responses. Metropolitan reserves the right to modify requirements based on case-specific issues and regulatory developments.

PUBLICATION HISTORY:

Initial Release	*July 2018*

Table of Contents

1.0 GENERAL INFORMATION 1
1.1 Introduction 1
1.2 Submittal and Review of Project Plans/Utilities and Maps 1
1.3 Identification of Metropolitan's Facilities and Rights-of-Way 3
2.0 General Requirements 3
2.1 Vehicular Access 3
2.2 Fences 3
2.3 Driveways and Ramps 3
2.4 Walks, Bike Paths, and Trails 3
2.5 Clear Zones 4
2.6 Slopes 4
2.7 Structures 4
2.8 Protection of Metropolitan Facilities 4
2.9 Potholing of Metropolitan Pipelines 4
2.10 Jacked Casings or Tunnels 4
3.0 Landscaping 5
3.1 Plans 5
3.2 Drought-Tolerant Native and California Friendly Plants 5
3.3 Trees 5
3.4 Other Vegetation 6
3.5 Irrigation 6
3.6 Metropolitan Vehicular Access 6
4.0 General Utilities 6
4.1 Utility Structures 6
4.2 Utility Crossings 6
4.3 Longitudinal Utilities 7
4.4 Underground Electrical Lines 7
4.5 Fiber Optic Lines 7
4.6 Overhead Electrical and Telephone Lines 7
4.7 Sewage Disposal Systems 7
4.8 Underground Tanks 8
5.0 Specific Utilities: Non-Potable Utility Pipelines 8
6.0 Cathodic Protection/Electrolysis Test Stations 8
6.1 Metropolitan Cathodic Protection 8
6.2 Review of Cathodic Protection Systems 8
7.0 Drainage 9
7.1 Drainage Changes Affecting Metropolitan Rights-of-Way 9
7.2 Metropolitan's Blowoff and Pumpwell Structures 9
8.0 Grading and Settlement 9

Table of Contents

8.1 Changes in Cover over Metropolitan Pipelines 9
8.2 Settlement 9

9.0 Construction Equipment 10
9.1 Review of Proposed Equipment 10
9.2 Equipment Restrictions 10
9.3 Vibratory Compaction Equipment 10
9.4 Equipment Descriptions 10

10.0 Excavations Close to Metropolitan Facilities 11
10.1 Shoring Design Submittal 11
10.2 Shoring Design Requirements 11

11.0 Support of Metropolitan Facilities 11
11.1 Support Design Submittal 11
11.2 Support Design Requirements 11

12.0 Backfill 12
12.1 Metropolitan Pipeline Not Supported 12
12.2 Metropolitan Pipeline Partially Exposed 12
12.3 Metropolitan Cut and Cover Conduit on Colorado River Aqueduct (CRA) 12

13.0 Piles 13
13.1 Impacts on Metropolitan Pipelines 13
13.2 Permanent Cast-in-place Piles 13

14.0 Protective Slabs for Road Crossings Over Metropolitan Pipelines 13

15.0 Blasting 13

16.0 Metropolitan Plan Review Costs, Construction Costs and Billing 14
16.1 Plan Review Costs 14
16.2 Cost of Modification of Facilities Performed by Metropolitan 14
16.3 Final Billing 14

17.0 Street Vacations and Reservation of Easements for Metropolitan 14

18.0 Metropolitan Land Use Guidelines 14

19.0 Compliance with Environmental Laws and Regulations 15

20.0 Paramount Rights / Metropolitan's Rights within Existing Rights-of-Way 17

21.0 Disclaimer and Information Accuracy 17

Table of Contents

Table 1: General Guidelines for Pipeline Separation between Metropolitan's Pipeline[1] and Sanitary Sewer[2] or Hazardous Fluid Pipeline[3].....18

Table 2: General Guidelines for Pipeline "Separation between Metropolitan's Pipeline[1] and Storm Drain and/or Recycled Water[2] 19

Table 3: General Guidelines for Pipeline "Separation[1] between Metropolitan's Pipeline and Recycled Water[2,4] Irrigationsm,.....20

Figure 1: AASHTO H-20 Loading.....21

Figure 2: Drawing SK-1.....22

This page is intentionally blank.

1.0 GENERAL INFORMATION

Note: Underground Service Alert at 811 must be notified at least two working days before excavating in proximity to Metropolitan's facilities.

1.1 Introduction

These guidelines provide minimum design and construction requirements for any utilities, facilities, developments, and improvements, or any other projects or activities, proposed in or near Metropolitan Water District of Southern California (Metropolitan) facilities and rights-of-way. Additional conditions and stipulations may also be required depending on project and site specific conditions. Any adverse impacts to Metropolitan's conveyance system, as determined by Metropolitan, will need to be mitigated to its satisfaction.

All improvements and activities must be designed so as to allow for removal or relocation at builder or developer expense, as set forth in the paramount rights provisions of Section 20.0. Metropolitan shall not be responsible for repair or replacement of improvements, landscaping or vegetation in the event Metropolitan exercises its paramount rights powers.

1.2 Submittal and Review of Project Plans/Utilities and Maps

Metropolitan requires project plans/utilities be submitted for all proposed activities that may impact Metropolitan's facilities or rights-of-way. Project plans shall include copies of all pertinent utilities, sewer line, storm drain, street improvement, grading, site development, landscaping, irrigation and other plans, all tract and parcel maps, and all necessary state and federal environmental documentation. Metropolitan will review the project plans and provide written approval, as it pertains to Metropolitan's facilities and rights-of-way. Written approval from Metropolitan must be obtained, prior to the start of any activity or construction in the area of Metropolitan's facilities or rights-of-way. Once complete project plans and supporting documents are submitted to Metropolitan, it generally takes 30 days to review and to prepare a detailed written response. Complex engineering plans that have the potential for significant impacts on Metropolitan's facilities or rights-of-way may require a longer review time.

Project plans, maps, or any other information should be submitted to Metropolitan's Substructures Team at the following mailing address:

Attn: Substructures Team
The Metropolitan Water District of Southern California
700 North Alameda St.
Los Angeles, CA 90012

General Mailing Address: **P.O. Box 54153**
Los Angeles, CA 90054-0153

Email: EngineeringSubstructures@mwdh2o.com

For additional information, or to request prints of detailed drawings for Metropolitan's facilities and rights-of-way, please contact Metropolitan's Substructures Team at 213-217-7663 or EngineeringSubstructures@mwdh2o.com.

1.3 Identification of Metropolitan's Facilities and Rights-of-Way

Metropolitan's facilities and rights-of-way must be fully shown and identified as Metropolitan's, with official recording data, on the following:

A. All applicable plans

B. All applicable tract and parcel maps

Metropolitan's rights-of-ways and existing survey monuments must be tied dimensionally to the tract or parcel boundaries. Metropolitan's Records of Survey must be referenced on the tract and parcel maps with the appropriate Book and Page.

2.0 General Requirements

2.1 Vehicular Access

Metropolitan must have vehicular access along its rights-of-way at all times for routine inspection, patrolling, operations, and maintenance of its facilities and construction activities. All proposed improvements and activities must be designed so as to accommodate such vehicular access.

2.2 Fences

Fences installed across Metropolitan's rights-of-way must include a 16-foot-wide gate to accommodate vehicular access by Metropolitan. Additionally, gates may be required at other specified locations to prevent unauthorized entry into Metropolitan's rights-of-way.

All gates must accommodate a Metropolitan lock or Knox-Box with override switch to allow Metropolitan unrestricted access. There should be a minimum 20-foot setback for gates from the street at the driveway approach. The setback is necessary to allow Metropolitan vehicles to safely pull off the road prior to opening the gate.

2.3 Driveways and Ramps

Construction of 16-foot-wide commercial-type driveway approaches is required on both sides of all streets that cross Metropolitan's rights-of-way. Access ramps, if necessary, must be a minimum of 16 feet wide.

There should be a minimum 20-foot setback for gates from the street at the driveway approach. Grades of ramps and access roads must not exceed 10 percent; if the slope of an access ramp or road must exceed 10 percent due to topography, then the ramp or road must be paved.

2.4 Walks, Bike Paths, and Trails

All walkways, bike paths, and trails along Metropolitan's rights-of-way must be a minimum 12-foot wide and have a 50-foot or greater radius on all horizontal curves if also used as Metropolitan's access roads. Metropolitan's access routes, including all walks and drainage facilities crossing the access routes, must be constructed to American Association of State Highway and Transportation Officials (AASHTO) H-20 loading standards (see Figure 1). Additional requirements will be placed on equestrian trails to protect the water quality of Metropolitan's pipelines and facilities.

2.5 Clear Zones

A 20-foot-wide clear zone is required to be maintained around Metropolitan's manholes and other above-ground facilities to accommodate vehicular access and maintenance. The clear zone should slope away from Metropolitan's facilities on a grade not to exceed 2 percent.

2.6 Slopes

Cut or fill slopes proposed within Metropolitan's rights-of-way must not exceed 10 percent. The proposed grade must not worsen the existing condition. This restriction is required to facilitate Metropolitan use of construction and maintenance equipment and allow uninhibited access to above-ground and below-ground facilities.

2.7 Structures

Construction of structures of any type is not allowed within the limits of Metropolitan's rights-of-way to avoid interference with the operation and maintenance of Metropolitan's facilities and possible construction of future facilities.

Footings and roof eaves of any proposed buildings adjacent to Metropolitan's rights-of-way must meet the following criteria:

A. Footings and roof eaves must not encroach onto Metropolitan's rights-of-way.

B. Footings must not impose any additional loading on Metropolitan's facilities.

C. Roof eaves must not overhang onto Metropolitan's rights-of-way.

Detailed plans of footings and roof eaves adjacent to Metropolitan's rights-of-way must be submitted for Metropolitan's review and written approval, as pertains to Metropolitan's facilities.

2.8 Protection of Metropolitan Facilities

Metropolitan facilities within its rights-of-way, including pipelines, structures, manholes, survey monuments, etc., must be protected from damage by the project proponent or property owner, at no expense to Metropolitan. The exact location, description and method of protection must be shown on the project plans.

2.9 Potholing of Metropolitan Pipelines

Metropolitan's pipelines must be potholed in advance, if the vertical clearance between a proposed utility and Metropolitan's pipeline is indicated to be 4 feet or less. A Metropolitan representative must be present during the potholing operation and will assist in locating the pipeline. Notice is required, a minimum of three working days, prior to any potholing activity.

2.10 Jacked Casings or Tunnels

A. General Requirements

Utility crossings installed by jacking, or in a jacked casing or tunnel under/over a Metropolitan pipeline, must have at least 3 feet of vertical clearance between the outside diameter of the pipelines and the jacked pipe, casing, or tunnel. The actual

cover over Metropolitan's pipeline shall be determined by potholing, under Metropolitan's supervision.

Utilities installed in a jacked casing or tunnel must have the annular space between the utility and the jacked casing or tunnel filled with grout. Provisions must be made for grouting any voids around the exterior of the jacked pipe, casing, or tunnel.

B. Jacking or Tunneling Procedures

Detailed jacking, tunneling, or directional boring procedures must be submitted to Metropolitan for review and approval. The procedures must cover all aspects of operation, including, but not limited to, dewatering, ground control, alignment control, and grouting pressure. The submittal must also include procedures to be used to control sloughing, running, or wet ground, if encountered. A minimum 10-foot clearance must be maintained between the face of the tunneling or receiving pits and outside edges of Metropolitan's facility.

C. Shoring

Detailed drawings of shoring for jacking or receiving pits must be submitted to Metropolitan for review and written-approval. (See Section 10 for shoring requirements).

D. Temporary Support

Temporary support of Metropolitan's pipelines may be required when a utility crosses under a Metropolitan pipeline and is installed by means of an open trench. Plans for temporary support must be reviewed and approved in writing by Metropolitan. (See Section 11, Supports of Metropolitan Facilities).

3.0 Landscaping

3.1 Plans

All landscape plans must show the location and limits of Metropolitan's right-of-way and the location and size of Metropolitan's pipeline and related facilities therein. All landscaping and vegetation shall be subject to removal without notice, as may be required by Metropolitan for ongoing maintenance, access, repair, and construction activities. Metropolitan will not be financially responsible for the removal of any landscaping and vegetation.

3.2 Drought-Tolerant Native and California Friendly Plants

Metropolitan recommends use of drought-tolerant native and California Friendly® plants (excluding sensitive plants) on proposed projects. For more information regarding California Friendly® plants refer to www.bewaterwise.com.

3.3 Trees

Trees are generally prohibited within Metropolitan's rights-of-way as they restrict Metropolitan's ability to operate, maintain and/or install new pipeline(s) located within these rights-of-way. Metropolitan will not be financially responsible for the removal and replacement of any existing trees should they interfere with access and any current or future Metropolitan project located within the right-of-way.

3.4 Other Vegetation

Shrubs, bushes, vines, and groundcover are generally allowed within Metropolitan's rights-of-way. Larger shrubs are not allowed on Metropolitan fee properties; however, they may be allowed within its easements if planted no closer than 15 feet from the outside edges of existing or future Metropolitan facilities. Only groundcover is allowed to be planted directly over Metropolitan pipeline, turf blocks or similar is recommended to accommodate our utility vehicle access. Metropolitan will not be financially responsible for the removal and replacement of the vegetation should it interfere with access and any current or future Metropolitan project.

3.5 Irrigation

Irrigation systems are acceptable within Metropolitan's rights-of-way, provided valves and controllers are located near the edges of the right-of-way and do not interfere with Metropolitan vehicular access. A shutoff valve should also be located along the edge of the right-of-way that will allow the shutdown of the system within the right-of-way should Metropolitan need to do any excavation. No pooling or saturation of water above Metropolitan's pipeline and right-of-way is allowed. Additional restrictions apply to non-potable water such as Recycled Water and are covered on Table 3 of Page 20.

3.6 Metropolitan Vehicular Access

Landscape plans must show Metropolitan vehicular access to Metropolitan's facilities and rights-of-way and must be maintained by the property owner or manager or homeowners association at all times. Walkways, bike paths, and trails within Metropolitan's rights-of-way may be used as Metropolitan access routes. (See Section 2.4, Walks, Bike Paths, and Trails).

4.0 General Utilities

Note: For non-potable piping like sewer, hazardous fluid, storm drain, disinfected tertiary recycled water and recycled water irrigation see Table 1 through Table 3.

4.1 Utility Structures

Permanent utility structures (e.g., manholes, power poles, pull boxes, electrical vaults, etc.) are not allowed within Metropolitan's rights-of-way. Metropolitan requests that all permanent utility structures within public streets be placed as far from its pipelines and facilities as practical, but not closer than 5 feet from the outside edges of Metropolitan facilities.

Note: Non-potable utility pipelines are an exception to the 5-foot minimum clearance. Non-potable utility pipelines should have 10 feet of separation.

4.2 Utility Crossings

Metropolitan requests a minimum of 1 foot of vertical clearance between Metropolitan's pipeline and any utility crossing the pipeline. Utility lines crossing Metropolitan's pipelines must be as perpendicular to the pipeline as possible. Cross-section drawings, showing proposed locations and elevations of utility lines and locations of Metropolitan's pipelines and limits of rights-of-way, must be submitted with utility plans, for all

crossings. Metropolitan's pipeline must be potholed under Metropolitan's supervision at the crossings (See Section 2.9).

4.3 Longitudinal Utilities

Installation of longitudinal utilities is generally not allowed along Metropolitan's rights-of-way. Within public streets, Metropolitan requests that all utilities parallel to Metropolitan's pipelines and appurtenant structures (facilities) be located as far from the facilities as possible, with a minimum clearance of 5 feet from the outside edges of the pipeline.

Note: Non-potable utility pipelines are an exception to the 5-foot minimum clearance. Non-potable utility pipelines should have 10 feet of separation (for more information See Table 1 on Page 18).

4.4 Underground Electrical Lines

Underground electrical conduits (110 volts or greater) which cross a Metropolitan's pipeline must have a minimum of 1 foot of vertical clearance between Metropolitan's pipeline and the electrical lines. Longitudinal electrical lines, including pull boxes and vaults, in public streets should have a minimum separation of 5 feet from the edge of a Metropolitan pipeline or structures.

4.5 Fiber Optic Lines

Fiber optic lines installed by directional boring require a minimum of 3 feet of vertical clearance when boring is over Metropolitan's pipelines and a minimum of 5 feet of vertical clearance when boring is under Metropolitan's pipelines. Longitudinal fiber optic lines, including pull boxes, in public streets should have a minimum separation of 5 feet from the edge of a Metropolitan pipelines or structures. Potholing must be performed, under Metropolitan's supervision, to verify the vertical clearances are maintained.

4.6 Overhead Electrical and Telephone Lines

Overhead electrical and telephone lines, where they cross Metropolitan's rights-of-way, must have a minimum 35 feet of clearance, as measured from the ground to the lowest point of the overhead line. Overhead electrical lines poles must be located at least 30 feet laterally from the edges of Metropolitan's facilities or outside Metropolitan's right-of-way, whichever is greater.

Longitudinal overhead electrical and or telephone lines in public streets should have a minimum separation of 10 feet from the edge of a Metropolitan pipelines or structures where possible.

4.7 Sewage Disposal Systems

Sewage disposal systems, including leach lines and septic tanks, must be a minimum of 100 feet from the outside limits of Metropolitan's rights-of-way or the edge of its facilities, whichever is greater. If soil conditions are poor, or other adverse site-specific conditions exist, a minimum distance of 150 feet is required. They must also comply with local and state health code requirements as they relate to sewage disposal systems in proximity to major drinking water supply pipelines.

4.8 Underground Tanks

Underground tanks containing hazardous materials must be a minimum of 100 feet from the outside limits of Metropolitan's rights-of-way or edge of its facilities, whichever is greater. In addition, groundwater flow should be considered with the placement of underground tanks down-gradient of Metropolitan's facilities.

5.0 Specific Utilities: Non-Potable Utility Pipelines

In addition to Metropolitan's general requirements, installation of non-potable utility pipelines (e.g., storm drains, sewers, and hazardous fluids pipelines) in Metropolitan's rights-of-way and public street rights-of-way must also conform to the State Water Resources Control Board's Division of Drinking Water (DDW) regulation (Waterworks Standards) and guidance for separation of water mains and non-potable pipelines and to applicable local county health code requirements. Written approval is required from DDW for the implementation of alternatives to the Waterworks Standards and, effective December 14, 2017, requests for alternatives to the Waterworks Standards must include information consistent with: DDW's Waterworks Standards Main Separation Alternative Request Checklist.

In addition to the following general guidelines, further review of the proposed project must be evaluated by Metropolitan and requirements may vary based on site specific conditions.

A. Sanitary Sewer and Hazardous Fluids (General Guideline See Table 1 on Page 18)

B. Storm Drain and Recycled Water (General Guideline See Table 2 on Page 19)

C. Irrigation with Recycled Water (General Guideline See Table 3 on Page 20)

D. Metropolitan generally does not allow Irrigation with recycled water to be applied directly above its treated water pipelines

E. Metropolitan requests copies of project correspondence with regulating agencies (e.g., Regional Water Quality Control Board, DDW); regarding the application of recycled water for all projects located on Metropolitan's rights-of-way

6.0 Cathodic Protection/Electrolysis Test Stations

6.1 Metropolitan Cathodic Protection

Metropolitan's existing cathodic protection facilities in the vicinity of any proposed work must be identified prior to any grading or excavation. The exact location, description, and type of protection must be shown on all project plans. Please contact Metropolitan for the location of its cathodic protection stations.

6.2 Review of Cathodic Protection Systems

Metropolitan must review any proposed installation of impressed-current cathodic protection systems on pipelines crossing or paralleling Metropolitan's pipelines to determine any potential conflicts with Metropolitan's existing cathodic protection system.

7.0 Drainage

7.1 Drainage Changes Affecting Metropolitan Rights-of-Way

Changes to existing drainage that could affect Metropolitan's rights-of-way require Metropolitan's approval. The project proponent must provide acceptable solutions to ensure Metropolitan's rights-of-way are not negatively affected by changes in the drainage conditions. Plans showing the changes, with a copy of a supporting hydrology report and hydraulic calculations, must be submitted to Metropolitan for review and approval. Long term maintenance of any proposed drainage facilities must be the responsibility of the project proponent, City, County, homeowner's association, etc., with a clear understanding of where this responsibility lies. If drainage must be discharged across Metropolitan's rights-of-way, it must be carried across by closed conduit or lined open channel and must be shown on the plans.

7.2 Metropolitan's Blowoff and Pumpwell Structures

Any changes to the existing local watercourse systems will need to be designed to accommodate Metropolitan's blowoff and pumpwell structures, which periodically convey discharged water from Metropolitan's blowoff and pumping well structures during pipeline dewatering. The project proponents' plans should include details of how these discharges are accommodated within the proposed development and must be submitted to Metropolitan for review and approval. Any blowoff discharge lines impacted must be modified accordingly at the expense of the project proponent.

8.0 Grading and Settlement

8.1 Changes in Cover over Metropolitan Pipelines

The existing cover over Metropolitan's pipelines must be maintained unless Metropolitan determines that proposed changes in grade and cover do not pose a hazard to the integrity of the pipeline or an impediment to its maintenance capability. Load and settlement or rebound due to change in cover over a Metropolitan pipeline or ground in the area of Metropolitan's rights-of-way will be factors considered by Metropolitan during project review.

In general, the minimum cover over a Metropolitan pipeline is 4 feet and the maximum cover varies per different pipeline. Any changes to the existing grade may require that Metropolitan's pipeline be potholed under Metropolitan's supervision to verify the existing cover.

8.2 Settlement

Any changes to the existing topography in the area of Metropolitan's pipeline or right-of-way that result in significant settlement or lateral displacement of Metropolitan's pipelines are not acceptable. Metropolitan may require submittal of a soils report showing the predicted settlement of the pipeline at 10-foot intervals for review. The data must be carried past the point of zero change in each direction and the actual size and varying depth of the fill must be considered when determining the settlement. Possible settlement due to soil collapse, rebound and lateral displacement must also be included.

In general, the typical maximum allowed deflection for Metropolitan's pipelines must not exceed a deflection of 1/4-inch for every 100 feet of pipe length. Metropolitan may require additional information per its Geotechnical Guidelines. Please contact Metropolitan's Substructures Team for a copy of the Geotechnical Guidelines.

9.0 Construction Equipment

9.1 Review of Proposed Equipment

Use of equipment across or adjacent to Metropolitan's facilities is subject to prior review and written approval by Metropolitan. Excavation, backfill, and other work in the vicinity of Metropolitan's facilities must be performed only by methods and with equipment approved by Metropolitan. A list of all equipment to be used must be submitted to Metropolitan a minimum of 30 days before the start of work.

A. For equipment operating within paved public roadways, equipment that imposes loads not greater than that of an AASHTO H-20 vehicle (see Figure 1 on Page 21) may operate across or adjacent to Metropolitan's pipelines provided the equipment operates in non-vibratory mode and the road remains continuously paved.

B. For equipment operating within unpaved public roadways, when the total cover over Metropolitan's pipeline is 10 feet or greater, equipment imposing loads no greater than those imposed by an AASHTO H-20 vehicle may operate over or adjacent to the pipeline provided the equipment is operated in non-vibratory mode. For crossings, vehicle path shall be maintained in a smooth condition, with no breaks in grade for 3 vehicle lengths on each side of the pipeline.

9.2 Equipment Restrictions

In general, no equipment may be used closer than 20 feet from all Metropolitan above-ground structures. The area around the structures should be flagged to prevent equipment encroaching into this zone.

9.3 Vibratory Compaction Equipment

Vibratory compaction equipment may not be used in vibratory mode within 20 feet of the edge of Metropolitan's pipelines.

9.4 Equipment Descriptions

The following information/specifications for each piece of equipment should be included on the list:

A. A description of the equipment, including the type, manufacturer, model year, and model number. For example, wheel tractor-scraper, 1990 Caterpillar 627E.

B. The empty and loaded total weight and the corresponding weight distribution. If equipment will be used empty only, it should be clearly stated.

C. The wheel base (for each axle), tread width (for each axle), and tire footprint (width and length) or the track ground contact (width and length), and track gauge (center to center of track).

10.0 Excavations Close to Metropolitan Facilities

10.1 Shoring Design Submittal

Excavation that impacts Metropolitan's facilities requires that the contractor submit an engineered shoring design to Metropolitan for review and acceptance a minimum of 30 days before the scheduled start of excavation. Excavation may not begin until the shoring design is accepted in writing by Metropolitan.

Shoring design submittals must include all required trenches, pits, and tunnel or jacking operations and related calculations. Before starting the shoring design, the design engineer should consult with Metropolitan regarding Metropolitan's requirements, particularly as to any special procedures that may be required.

10.2 Shoring Design Requirements

Shoring design submittals must be stamped and signed by a California registered civil or structural engineer. The following requirements apply:

A. The submitted shoring must provide appropriate support for soil adjacent to and under Metropolitan's facilities.

B. Shoring submittals must include detailed procedures for the installation and removal of the shoring.

C. Design calculations must follow the Title 8, Chapter 4, Article 6 of the California Code of Regulations (CCR) guidelines. Accepted methods of analysis must be used.

D. Loads must be in accordance with the CCR guidelines or a soils report by a geotechnical consultant.

E. All members must be secured to prevent sliding, falling, or kickouts.

Metropolitan's pipelines must be located by potholing under Metropolitan's supervision before the beginning construction. Use of driven piles within 20 feet of the centerline of Metropolitan's pipeline is not allowed. Piles installed in drilled holes must have a minimum 2-foot clearance between Metropolitan's pipeline and the edge of the drilled hole, and a minimum of 1-foot clearance between any part of the shoring and Metropolitan's pipeline.

11.0 Support of Metropolitan Facilities

11.1 Support Design Submittal

If temporary support of a Metropolitan facility is required, the contractor shall submit a support design plan to Metropolitan for review and approval a minimum of 30 days before the scheduled start of work. Work may not begin until the support design is approved in writing by Metropolitan. Before starting design, the design engineer should consult with Metropolitan regarding Metropolitan's requirements.

11.2 Support Design Requirements

Support design submittals must be prepared, stamped, and signed by a California registered civil or structural engineer. The following requirements apply:

A. Support drawings must include detailed procedures for the installation and removal of the support system.

B. Design calculations must follow accepted practices, and accepted methods of analysis must be used.

C. Support designs must show uniform support of Metropolitan's facilities with minimal deflection.

D. The total weight of the facility must be transferred to the support system before supporting soil is fully excavated.

E. All members must be secured to prevent sliding, falling, or kickouts.

12.0 Backfill

12.1 Metropolitan Pipeline Not Supported

In areas where a portion of Metropolitan pipeline is not supported during construction, the backfill under and to an elevation of 6 inches above the top of the pipeline must be one-sack minimum cement sand slurry. To prevent adhesion of the slurry to Metropolitan's pipeline, a minimum 6-mil-thick layer of polyethylene sheeting or similar approved sheeting must be placed between the concrete support and the pipeline.

12.2 Metropolitan Pipeline Partially Exposed

In areas where a Metropolitan pipeline is partially exposed during construction, the backfill must be a minimum of 6 inches above the top of the pipeline with sand compacted to minimum 90 percent compaction.

12.3 Metropolitan Cut and Cover Conduit on Colorado River Aqueduct (CRA)

In areas where a Metropolitan cut and cover conduit is exposed, the following guidelines apply:

A. No vehicle or equipment shall operate over or cross the conduit when the cover is less than 3 feet.

B. Track-type dozer with a gross vehicle weight of 12,000 lbs or less may be used over the conduit when the cover is a minimum of 3 feet.

C. Wheeled vehicles with a gross vehicle weight of 8,000 lbs or less may operate over the conduit when the cover is a minimum of 4 feet.

D. Tracked dozer or wheeled vehicle should be used to push material over the conduit from the side.

E. Tracked dozer or wheeled vehicle should gradually increase cover on one side of the conduit and then cross the conduit and increase cover on the other side of the conduit. The cover should be increased on one side of the conduit until a maximum of 2 feet of fill has been placed. The cover over the conduit is not allowed to be more than 2 feet higher on one side of the conduit than on the other side.

F. The cover should be gradually increased over the conduit until the grade elevations have been restored.

13.0 Piles

13.1 Impacts on Metropolitan Pipelines

Pile support for structures could impose lateral, vertical and seismic loads on Metropolitan's pipelines. Since the installation of piles could also cause settlement of Metropolitan pipelines, a settlement and/or lateral deformation study may be required for pile installations within 50 feet of Metropolitan's pipelines. Metropolitan may require additional information per its Geo-technical Guidelines for pile installation. Please contact Metropolitan's Substructures Team for a copy of the Geotechnical Guidelines.

13.2 Permanent Cast-in-place Piles

Permanent cast-in-place piles must be constructed so that down drag forces of the pile do not act on Metropolitan's pipeline. The pile must be designed so that down drag forces are not developed from the ground surface to springline of Metropolitan's pipeline.

Permanent cast-in-place piles shall not be placed closer than 5 feet from the edge of Metropolitan's pipeline. Metropolitan may require additional information per its Geo-technical Guidelines for pile installation. Please contact Metropolitan's Substructures Team for a copy of the Geotechnical Guidelines.

14.0 Protective Slabs for Road Crossings Over Metropolitan Pipelines

Protective slabs must be permanent cast-in-place concrete protective slabs configured in accordance with Drawing SK-1 (See Figure 2 on Page 22).

The moments and shear for the protective slab may be derived from the American Association of State Highway and Transportation Officials (AASHTO). The following requirements apply:

A. The concrete must be designed to meet the requirements of AASHTO

B. Load and impact factors must be in accordance with AASHTO. Accepted methods of analysis must be used.

C. The protective slab design must be stamped and signed by a California registered civil or structural engineer and submitted to Metropolitan with supporting calculations for review and approval.

Existing protective slabs that need to be lengthened can be lengthened without modification, provided the cover and other loading have not been increased.

15.0 Blasting

At least 90 days prior to the start of any drilling for rock excavation blasting, or any blasting in the vicinity of Metropolitan's facilities, a site-specific blasting plan must be submitted to Metropolitan for review and approval. The plan must consist of, but not be limited to, hole diameters, timing sequences, explosive weights, peak particle velocities (PPV) at Metropolitan pipelines/structures, and their distances to blast locations. The PPV must be estimated based on a site-specific power law equation. The power law equation provides the peak particle velocity versus the scaled distance and must be calibrated based on measured values at the site.

16.0 Metropolitan Plan Review Costs, Construction Costs and Billing

16.1 Plan Review Costs

Metropolitan plan reviews requiring 8 labor hours or less are generally performed at no cost to the project proponent. Metropolitan plan reviews requiring more than 8 labor hours must be paid by the project proponent, unless the project proponent has superior rights at the project area. The plan review will include a written response detailing Metropolitan's comments, requirements, and/or approval.

A deposit of funds in the amount of the estimated cost and a signed letter agreement will be required from the project proponent before Metropolitan begins or continues a detailed engineering plan review that exceeds 8 labor hours.

16.2 Cost of Modification of Facilities Performed by Metropolitan

Cost of modification work conducted by Metropolitan will be borne by the project proponent, when Metropolitan has paramount/prior rights at the subject location.

Metropolitan will transmit a cost estimate for the modification work to be performed (when it has paramount/prior rights) and will require that a deposit, in the amount of the estimate, be received before the work will be performed.

16.3 Final Billing

Final billing will be based on the actual costs incurred, including engineering plan review, inspection, materials, construction, and administrative overhead charges calculated in accordance with Metropolitan's standard accounting practices. If the total cost is less than the deposit, a refund will be made; however, if the cost exceeds the deposit, an invoice for the additional amount will be forwarded for payment.

17.0 Street Vacations and Reservation of Easements for Metropolitan

A reservation of an easement is required when all or a portion of a public street where Metropolitan facilities are located is to be vacated. The easement must be equal to the street width being vacated or a minimum 40 feet. The reservation must identify Metropolitan as a "public entity" and not a "public utility," prior to recordation of the vacation or tract map. The reservation of an easement must be submitted to Metropolitan for review prior to final approval.

18.0 Metropolitan Land Use Guidelines

If you are interested in obtaining permission to use Metropolitan land (temporary or long term), a Land Use Form must be completed and submitted to Metropolitan for review and consideration. A nonrefundable processing fee is required to cover Metropolitan's costs for reviewing your request. Land Use Request Forms can be found at:

http://mwdh2o.com/PDF_Doing_Your_Business/4.7.1_Land_Use_Request_form_revised.pdf

The request should be emailed to RealEstateServices@mwdh2o.com,or contact the Real Property Development and Management (RPDM) Group at (213) 217-7750.

After the initial application form has been submitted, Metropolitan may require the following in order to process your request:

A. A map indicating the location(s) where access is needed, and the location & size (height, width and depth) of any invasive subsurface activity (boreholes, trenches, etc.).

B. The California Environmental Quality Act (CEQA) document(s) or studies that have been prepared for the project (e.g., initial study, notice of exemption, Environmental Impact Report (EIR), Mitigated Negative Declaration (MND), etc.).

C. A copy of an ACORD insurance certification naming Metropolitan as an additional insured, or a current copy of a statement of self-insurance.

D. Confirmation of the legal name of the person(s) or entity(ies) that are to be named as the permittee(s) in the entry permit.

E. Confirmation of the purpose of the land use.

F. The name of the person(s) with the authority to sign the documents and any specific signature title block requirements for that person or any other persons required to sign the document (i.e., legal counsel, Board Secretary/Clerk, etc.).

G. A description of any vehicles that will have access to the property. The exact make or model information is not necessary; however, the general vehicle type, expected maximum dimensions (height, length, width), and a specific maximum weight must be provided.

Land use applications and proposed use of the property must be compatible with Metropolitan's present and/or future use of the property. Any preliminary review of your request by Metropolitan shall not be construed as a promise to grant any property rights for the use of Metropolitan's property.

19.0 Compliance with Environmental Laws and Regulations

As a public agency, Metropolitan is required to comply with all applicable environmental laws and regulations related to the activities it carries out or approves. Consequently, project plans, maps, and other information must be reviewed to determine Metropolitan's obligations pursuant to state and federal environmental laws and regulations, including, but not limited to:

A. California Environmental Quality Act (CEQA) (Public Resources Code 21000-21177) and the State CEQA Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 1500-15387)

B. Federal Endangered Species Act (ESA) of 1973, 16 U.S.C. §§ 1531, et seq.

C. California Fish and Game Code Sections 2050-2069 (California ESA)

D. California Fish and Game Code Section 1602

E. California Fish and Game Code Sections 3511, 4700, 5050 and 5515 (California fully protected species)

F. Federal Migratory Bird Treaty Act (MBTA), 16 U.S.C. §§ 703-712

G. Federal Clean Water Act (including but not limited to Sections 404 and 401) 33 U.S.C. §§ 1342, 1344)

H. Porter Cologne Water Quality Control Act of 1969, California Water Code §§ 13000-14076.

I. Title 22, California Code of Regulations, Chapter 16 (California Waterworks Standards), Section 64572 (Water Main Separation)

Metropolitan may require the project applicant to pay for any environmental review, compliance and/or mitigation costs incurred to satisfy such legal obligations.

20.0 Paramount Rights / Metropolitan's Rights within Existing Rights-of-Way

Facilities constructed within Metropolitan's rights-of-way shall be subject to the paramount right of Metropolitan to use its rights-of-way for the purpose for which they were acquired. If at any time Metropolitan or its assigns should, in the exercise of their rights, find it necessary to remove or relocate any facilities from its rights-of-way, such removal and replacement or relocation shall be at the expense of the owner of the facility.

21.0 Disclaimer and Information Accuracy

Metropolitan assumes no responsibility for the accuracy of the substructure information herein provided. The user assumes responsibility for verifying substructure locations before excavating and assumes all liability for damage to Metropolitan's facilities as a result of such excavation. Additionally, the user is cautioned to conduct surveys and other field investigations as you may deem prudent, to assure that your project plans are correct. The relevant representative from Metropolitan must be called at least two working days, before any work activity in proximity to Metropolitan's facilities.

It generally takes 30 days to review project plans and provide written responses. Metropolitan reserves the right to modify requirements based on case-specific issues and regulatory developments.

Table 1: General Guidelines for Pipeline Separation between Metropolitan's Pipeline[1] and Sanitary Sewer[2] or Hazardous Fluid Pipeline[3]

Pipeline Crossings	Metropolitan requires that sanitary sewer and hazardous fluid pipelines that cross Metropolitan's pipelines have special pipe construction (no joints) **and** secondary containment[4]. This is required for the full width of Metropolitan's rights-of-way or within 10 feet tangent to the outer edges of Metropolitan's pipeline within public streets. Additionally, sanitary sewer and hazardous fluid pipelines crossing Metropolitan's pipelines must be perpendicular and maintain a minimum 1-foot vertical clearance between the top and the bottom of Metropolitan's pipeline and the pipe casing. These requirements apply to all sanitary sewer crossings regardless if the sanitary sewer main is located below or above Metropolitan's pipeline.
Parallel Pipeline	Metropolitan generally does not permit the installation of longitudinal pipelines along its rights-of-way. Within public streets, Metropolitan requires that all parallel sanitary sewer, hazardous fluid pipelines and/or non-potable utilities be located a minimum of 10 feet from the outside edges of Metropolitan's pipelines. When 10-foot horizontal separation criteria cannot be met, longitudinal pipelines require special pipe construction (no joints) **and** secondary containment[4].
Sewer Manhole	Sanitary sewer manholes are not allowed within Metropolitan's rights-of-way. Within public streets, Metropolitan requests manholes parallel to its pipeline be located a minimum of 10 feet from the outside edges of its pipelines. When 10 foot horizontal separation criteria cannot be met, the structure must have secondary containment[5].

Notes:

[1] *Separation distances are measured from the outer edges of each pipe.*

[2] *Sanitary sewer requirements apply to all recycled water treated to less than disinfected tertiary recycled water (disinfected secondary recycled water or less).* Recycled water definitions are included in Title 22, California Code of Regulations, Chapter 3 (Water Recycling Criteria), Section 60301.

[3] *Hazardous fluids include e.g., oil, fuels, chemicals, industrial wastes, wastewater sludge, etc.*

[4] *Secondary Containment for Pipeline - Secondary containment consists of a continuous pipeline sleeve (no joints). Examples acceptable to Metropolitan include welded steel pipe with grout in annular space and cathodic protection (unless coated with non-conductive material) and High Density Polyethylene (HDPE) pipe with fusion-welded joints.*

[5] *Secondary Containment for Structures – Secondary containment consists of external HDPE liner or other approved method.*

Table 2: General Guidelines for Pipeline Separation between Metropolitan's Pipeline[1] and Storm Drain and/or Disinfected Tertiary Recycled Water[2]

Pipeline Crossings	Metropolitan requires crossing pipelines to be special pipe construction (no joints) or have secondary containment[3] within 10-feet tangent to the outer edges of Metropolitan's pipeline. Additionally, pipelines crossing Metropolitan's pipelines must be perpendicular and maintain a minimum 1-foot vertical clearance.
Parallel Pipeline	Metropolitan generally does not permit the installation of longitudinal pipelines along its rights-of-way. Within public streets, Metropolitan requests that all parallel pipelines be located a minimum of 10 feet from the outside edges of Metropolitan's pipelines. When 10-foot horizontal separation criteria cannot be met, special pipe construction (no joints) or secondary containment[3] are required.
Storm Drain Manhole	Permanent utility structures (e.g., manhole. catch basin, inlets) are not allowed within Metropolitan's rights-of-way. Within public streets, Metropolitan requests all structures parallel to its pipeline be located a minimum of 10 feet from the outside edges of its pipelines. When 10 foot horizontal separation criteria cannot be met, the structure must have secondary containment[4].

Notes:

[1] *Separation distances are measured from the outer edges of each pipe.*

[2] *Disinfected tertiary recycled water as defined* in Title 22, California Code of Regulations, Chapter 3 (*Water Recycling Criteria*), Section 60301.

[3] *Secondary Containment for Pipeline - Secondary containment consists of a continuous pipeline sleeve (no joints). Examples acceptable to Metropolitan include welded steel pipe with grout in annular space and cathodic protection (unless coated with non-conductive material) and High Density Polyethylene (HDPE) pipe with fusion-welded joints.*

[4] *Secondary Containment for Structures – Secondary containment consists of external HDPE liner or other approved method.*

Table 3: General Guidelines for Pipeline Separation[1] between Metropolitan's Pipeline and Recycled Water[2,4] Irrigations

Pressurized recycled irrigation mainlines	• Crossings - must be perpendicular and maintain a minimum 1-foot vertical clearance. Crossing pressurized recycled irrigation mainlines must be special pipe construction (no joints) or have secondary containment[3] within 10-feet tangent to the outer edges of Metropolitan's pipeline. • Longitudinal - must maintain a minimum 10-foot horizontal separation and route along the perimeter of Metropolitan's rights-of-way where possible.
Intermittently Energized Recycled Water Irrigation System Components	• Crossings - must be perpendicular and maintain a minimum 1-foot vertical clearance. Crossing irrigation laterals within 5-feet tangent to the outer edges of Metropolitan's pipeline must be special pipe construction (no joints) or have secondary containment[3]. • Longitudinal – must maintain a minimum 5-foot horizontal separation between all intermittently energized recycled water irrigation system components (e.g. irrigation lateral lines, control valves, rotors) and the outer edges of Metropolitan's pipeline. Longitudinal irrigation laterals within 5-feet tangent to the outer edges of Metropolitan's pipeline must be special pipe construction (no joints) or have secondary containment[3].
Irrigation Structures	Irrigation structures such as meters, pumps, control valves, etc. must be located outside of Metropolitan's rights-of-way.
Irrigation spray rotors near Metropolitan's aboveground facilities	Irrigation spray rotors must be located a minimum of 20-foot from any Metropolitan above ground structures with the spray direction away from these structures. These rotors should be routinely maintained and adjusted as necessary to ensure no over-spray into 20-foot clear zones.
Irrigations near open canals and aqueducts	Irrigation with recycled water near open canals and aqueducts will require a setback distance to be determined based on site-specific conditions. Runoff of recycled water must be contained within an approved use area and not impact Metropolitan facilities. Appropriate setbacks must also be in place to prevent overspray of recycled water impacting Metropolitan's facilities.

Notes:

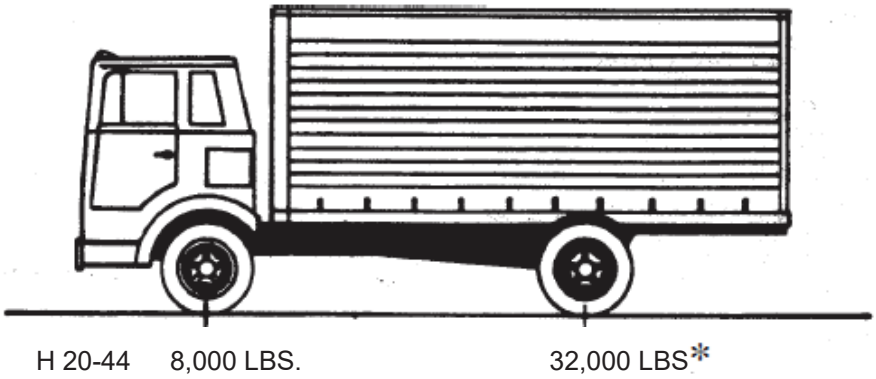
[1] *Separation distances are measured from the outer edges of each pipe.*

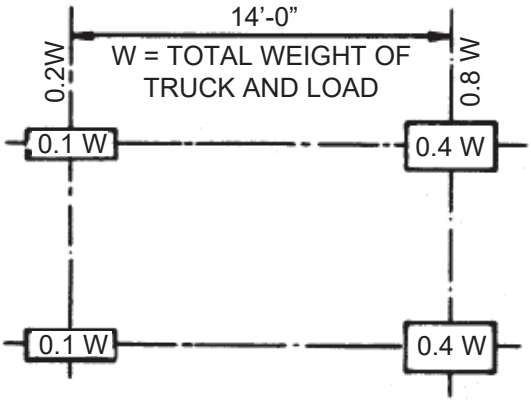
[2] *Requirements for recycled water irrigation apply to all levels of treatment of recycled water for non-potable uses.* Recycled water definitions are included in Title 22, California Code of Regulations, Chapter 3 (*Water Recycling Criteria*), Section 60301.

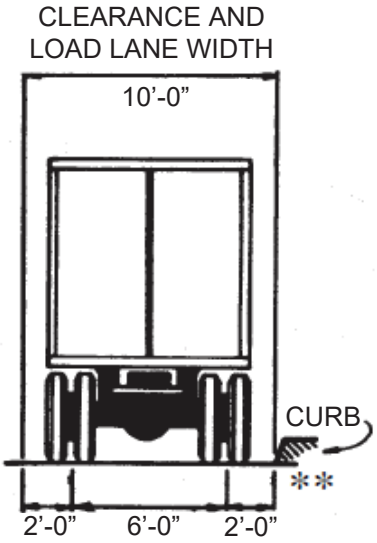
[3] *Secondary Containment for Pipeline - Secondary containment consists of a continuous pipeline sleeve (no joints). Examples acceptable to Metropolitan include welded steel pipe with grout in annular space and cathodic protection (unless coated with non-conductive material) and High Density Polyethylene (HDPE) pipe with fusion-welded joints.*

[4] *Irrigation with recycled water shall not be applied directly above Metropolitan's treated water pipelines.*

Figure 1: AASHTO H-20 Loading

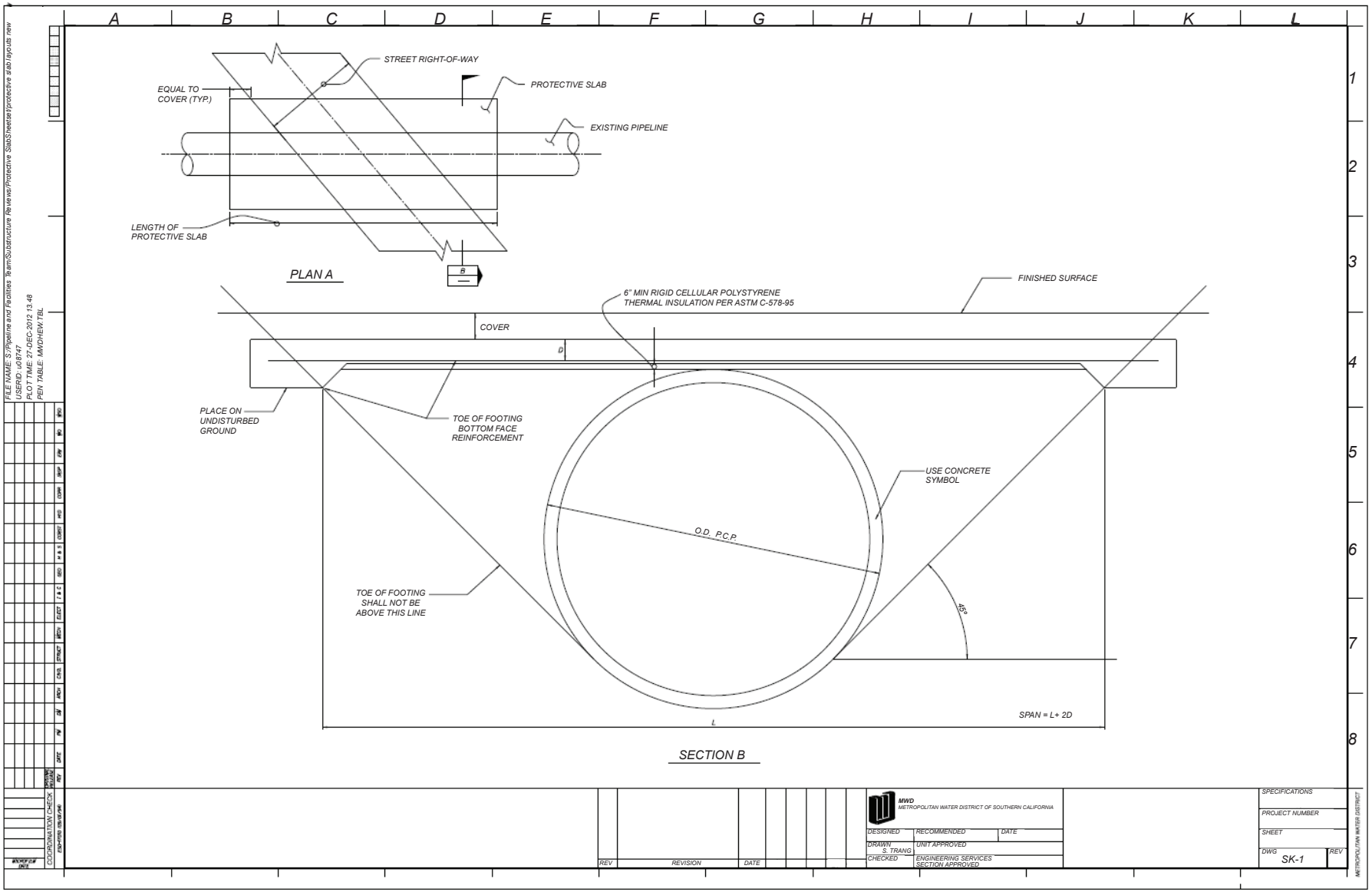






Note: The H loadings consist of a two-axle truck or the corresponding lane loadings as illustrated above. The H loadings are designated "H" followed by a number indicating the gross weight in tons of the standard truck.

Figure 2: Drawing SK-1



STATE OF CALIFORNIA Gavin Newsom, Governor

NATIVE AMERICAN HERITAGE COMMISSION

CHAIRPERSON
Reginald Pagaling
Chumash

VICE-CHAIRPERSON
Buffy McQuillen
Yokayo Pomo, Yuki, Nomlaki

SECRETARY
Isaac Bojorquez
Ohlone-Costanoan

PARLIAMENTARIAN
Wayne Nelson
Luiseño

COMMISSIONER
Sara Dutschke
Miwok

COMMISSIONER
Stanley Rodriguez
Kumeyaay

COMMISSIONER
Bennae Calac
Pauma-Yuima Band of Luiseño Indians

COMMISSIONER
Vacant

COMMISSIONER
Vacant

EXECUTIVE SECRETARY
Andrew Alejandre
Paskenta Band of Nomlaki Indians

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

March 10, 2026

Candice Hughes
County of Riverside
4080 Lemon Street
12th Floor
Riverside CA 92502

Re: 2026030377 Cabazon Infrastructure Plan and Cabazon Community Plan Project (GPA No. 01206 and ZR6234) Project, Riverside County

To Whom It May Concern:

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

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:

a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or

b. 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:

a. Avoidance and preservation of the resources in place, including, but not limited to:

i. Planning and construction to avoid the resources and protect the cultural and natural context.

ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.

b. 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:

i. Protecting the cultural character and integrity of the resource.

ii. Protecting the traditional use of the resource.

iii. Protecting the confidentiality of the resource.

c. 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.

d. Protecting the resource. (Pub. Resource Code §21084.3 (b)).

e. 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)).

f. 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:

a. 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.

b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.

c. 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

RIVERSIDE COUNTY TRANSPORTATION COMMISSION

4080 Lemon Street, 3rd Floor • Riverside, CA
Mailing Address: P.O. Box 12008 • Riverside, CA 92502-2208
951.787.7141 • 951.787.7920 • www.rctc.org

April 7, 2026

County of Riverside
Transportation and Land Management Agency
Attn: Candice Hughes, District 5 Principal Planner
P.O. Box 1409
Riverside, CA 92502

Subject: RCTC Comments on the Notice of Preparation for the Cabazon Community Plan and Cabazon Infrastructure Plan Program EIR

Dear Ms. Hughes:

The Riverside County Transportation Commission (RCTC) appreciates the opportunity to comment on the County's Notice of Preparation (NOP) for the Program Environmental Impact Report (EIR) for the Cabazon Community Plan (CCP) and Cabazon Infrastructure Plan (CIP). RCTC supports the County's ongoing efforts to plan for future growth and infrastructure needs in the Cabazon area.

RCTC would like to formally notify the County that the Coachella Valley Rail Project, a multi-agency effort led in partnership with the California Department of Transportation (Caltrans) Division of Rail and the Federal Railroad Administration (FRA), is actively progressing through environmental review and preliminary engineering. As part of this project, RCTC is evaluating the feasibility of future intercity passenger rail service between Los Angeles and the Coachella Valley, including the potential establishment of a new passenger rail station in the Cabazon area, located along the existing Union Pacific Railroad corridor that traverses the Community Plan boundary.

Given the overlap between the Community Plan area and the Union Pacific Railroad corridor, RCTC respectfully requests that the Program EIR incorporate the Coachella Valley Rail Project as a reasonably foreseeable regional transportation improvement. Early consideration of this project will help ensure consistency between the County's land use and infrastructure planning and RCTC's ongoing rail planning efforts.

Specifically, RCTC requests that the Program EIR:

- Identify the Coachella Valley Rail Project in its transportation, land use, and cumulative impact analyses;

- Evaluate the potential for a future passenger rail station in the Cabazon area, including any related implications for roadway access, circulation, utilities, land use compatibility, and economic development; and
- Maintain coordination with RCTC throughout the County's planning and environmental review process to ensure compatible and mutually supportive outcomes.

RCTC appreciates the County's forward-looking planning efforts and welcomes continued collaboration as both agencies advance major multimodal improvements benefiting western Riverside County. Please contact me at 951-787-4015 or EGalloway@rctc.org if you have any questions or if follow-up coordination would be helpful.

Thank you for your consideration.

Sincerely,

Erik Galloway
Capital Projects Delivery Director

Cc: Bechtel (G. Quintero, M. Arroyo); Project File

RIVERSIDE COUNTY
DEPARTMENT OF
WASTE RESOURCES

Andy Cortez, General Manager-Chief Engineer

SENT VIA EMAIL ONLY
CabazonPlan@rivco.org

March 30, 2026

Riverside County Planning Department
Attn: Candice Hughes, District 5 Principal Planner
PO Box 1409
4080 Lemon Street 12th Floor
Riverside, CA 92502-1409

RE: Notice of Preparation (NOP) of The Draft Environmental Impact Report (DEIR) for The Cabazon Infrastructure Plan (CIP) and the Cabazon Community Plan Project (Project)– General Plan Amendment No. 01206 (GPA No. 01206 and ZR 6234)

Dear Candice Hughes.

The Riverside County Department of Waste Resources (RCDWR) has reviewed the NOP of the DEIR for the Project. The Cabazon Infrastructure Plan (CIP) and Cabazon Community Plan Project area is approximately 7,768 acres located within the northwestern portion of the County of Riverside east of the city of Banning and the project area is accessible by Interstate 10 (1-10), which bisects the project area in an east-west direction and provides interchanges to the project area at Malki Road, Morongo Trail, at Main Street. The project area is also bisected by the Union Pacific rail line which runs parallel to 1-10 in the project area. The project area is bounded by the Morongo Indian Reservation to the north, unincorporated areas of Riverside County to the north and south, the cities of Desert Hot Springs and Palm Springs and Banning. The project area is entirely within the County of Riverside General Plan (General Plan) Pass Area Plan. The proposed project would include the implementation of the CIP. The goal of the Cabazon Community Plan (GPA No. 01206) is to address the Community of Cabazon's land use and infrastructure needs to prepare the Cabazon area for significant growth and development, to accommodate up to 25,000 new housing units over the next 30 years. The CIP (ZR6234) would support buildout of the Community Plan by identifying needs and suggesting alternatives for the availability and expansion of infrastructure in the Cabazon Community Plan area. Approval of the CIP and Cabazon Community Plan will require amendments to the County of Riverside General Plan, Zoning Code, and Zoning Map, as well as an approval of Community Design Guidelines.

The RCDWR offers the following information for use in the Project's DEIR analysis of solid waste impacts:

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 DEIR

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

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 and serviced 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.

   b) The waste hauler may utilize the El Sobrante, Lamb Canyon, and/or the Badlands for disposal in our western locations, and the Blythe, and/or the Oasis Landfill for disposal in our desert areas. 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 2025 Annual Report, the landfill had a remaining in-County disposal capacity of approximately 46.1 million tons. [2] In 2025, the El Sobrante Landfill accepted a daily average of 11,278 tons with a period total of approximately 3,462,304 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]

[2] 2025 El Sobrante Landfill Annual Report- Based on 115,286,220 tons remaining capacity (40% for in-county waste).
[3] GASB 18_ 2025 – Engineering Estimate for total landfill capacity

As of January 1, 2026 (beginning of day), the landfill has a total remaining capacity of approximately 5.4 million tons.[4] The current landfill remaining disposal capacity is estimated to last, at a minimum, until approximately 2032.[5] From January 2025 to December 2025, the Lamb Canyon Landfill accepted a daily average of 2,238 tons with a period total of approximately 687,184 tons. Landfill expansion potential exists at the Lamb Canyon Landfill site.

Badlands Landfill:

The Badlands Landfill is located northeast of the City of Moreno Valley at 31125 Ironwood Avenue and accessed from State Highway 60 at Theodore Avenue. The landfill is owned and operated by Riverside County. The existing landfill encompasses 1,168.3 acres, with a total 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, 2026 (beginning of day), the landfill had a total remaining disposal capacity of approximately 48.1 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 2025 to December 2025, the Badlands Landfill accepted a daily average of 2,646 tons with a period total of approximately 812,398 tons.

Blythe Landfill:

The Blythe Landfill is located at 1000 Midland Road, Blythe CA 92225. The landfill is owned and operated by the RCDWR. The landfill property encompasses approximately 365-acres, of which 78.1 acres are permitted for waste disposal. The site has an estimated total capacity of approximately 2.4 million tons. The landfill is currently permitted to receive a maximum of 400 tons per day of refuse, and as of January 1, 2026, had a remaining capacity of approximately 1.39 million tons. It is estimated that the remaining disposal capacity will last until approximately 2052. During 2025, the Blythe Landfill accepted a daily average volume of 80 tons, for a period total of approximately 21,236 tons.

Oasis Landfill:

The Oasis Landfill is located in an unincorporated area of Riverside County at 84-505 84th Avenue, Oasis, CA. The landfill is owned by Riverside County and operated by the

[4] GASB 18 2025 & SiteInfo
[5] SWFP # 33-AA-0007
[6] SWFP # 33-AA-0006
[7] GASB_18_2025 & SiteInfo
[8] SWFP # 33-AA-0006

RCDWR. The landfill is currently open once a week (Wednesdays) and the landfill property encompasses approximately 165.36 acres, of which 23.3 acres encompass the current landfill disposal area. The landfill is currently permitted to receive 400 tpd of MSW for disposal and 50 tpd for beneficial reuse. The site has an estimated total capacity of approximately 0.32 million tons. As of January 1, 2026, the landfill has an estimated remaining refuse capacity of 46,892 tons. The current landfill remaining disposal capacity is estimated to last, at a minimum, until landfill closure in the year 2055. During 2025, the Oasis Landfill accepted a daily average volume of 13 tons and a period total of approximately 675 tons.[8]

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 landfilling [9]:

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

[8] SiteInfo 2025 (Jan 1 – December 31) Daily Landfill Total Tonnage and Total Traffic By Site
[9] A.B. 75, Chapter 764, 1999-2000 Strom-Martin, (Cal. 1999).

verification) shall be submitted demonstrating project compliance with the approved WRP.

- AB 341 focuses on increased commercial waste recycling as a method to reduce greenhouse gas (GHG) emissions. The regulation requires businesses and organizations that generate four or more cubic yards of waste per week and multifamily units of 5 or more, to recycle. A business shall take at least one of the following actions in order to reuse, recycle, compost, or otherwise divert commercial solid waste from disposal:
  - Source separate recyclable and/or compostable material from solid waste and donate or self-haul the material to recycling facilities.
  - Subscribe to a recycling service with waste hauler.
  - Provide recycling service to tenants (if commercial or multi-family complex).
  - Demonstrate compliance with requirements of California Code of Regulations Title 14.

    For more information, please visit:

    http://www.rcwaste.org/business/recycling/mcr
- AB 1826 requires businesses and multifamily complexes to arrange for organic waste recycling services. Those subject to AB 1826 shall take at least one of the following actions in order to divert organic waste from disposal:
  - Source separate organic material from all other recyclables and donate or self-haul to a permitted organic waste processing facility.
  - Enter into a contract or work agreement with gardening or landscaping service provider or refuse hauler to ensure the waste generated from those services meet the requirements of AB 1826.
- 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.

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

Thank you for allowing us the opportunity to comment on the NOP. Please continue providing 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
Associate Planner

Cc: Kinika Hesterly, RCDWR

DM# 372156

April 8, 2026

Candace Hughes
County of Riverside
4080 Lemon Street, 12th Flr.
P.O. Box 1409
Riverside CA 92502
Submitted via email: CabazonPlan@rivco.org

Re: Program EIR for Cabazon Infrastructure Plan (CIP) and Cabazon Community Plan (CCP) Project

Dear Ms. Hughes:

The undersigned organizations appreciate this opportunity to provide input into the scope and content of the environmental information to be included in the above-referenced Program EIR. Collectively, our organizations represent tens of thousands of concerned individuals in Riverside County and beyond. The undersigned also have extensive experience and expertise regarding desert and mountain species, natural communities, and ecological processes. We would welcome the opportunity to make our experience and expertise available to the EIR consultants.

As the NOP notes in the Project Description for the proposed CCP and CIP, "the region plans for the possibility of accommodating up to 25,000 new housing units over the next 30 years" in the Community of Cabazon, where there are currently roughly 2,000 housing units. This highlights the challenge faced by the County in balancing such growth with maintaining the environmental quality of the area and the ecological processes there that

are crucial to ecosystem functions both within and beyond the Cabazon Community Plan area. Major issues that must be addressed in the EIR include: 1) the Full Range of Impacts from the Physical Development and Population Growth Supported/Facilitated by the Proposed Project; 2) Consistency with the Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP) and the Western Riverside Multiple Species Habitat Conservation Plan (WR-MSHCP); 3) Potential Impacts to Regionally Important Linkages and Conservation Lands Beyond the Immediate Project Area; 4) Project Alternatives; and 5) Consistency with the Existing County General Plan.

Before elaborating on these issues, we note a threshold issue that must be addressed in the EIR's consideration of all five of these issues; that is the genesis of the County's assertion that up to 25,000 housing units must be accommodated in the Cabazon area over the next 30 years. We note that the SCAG report on the grant the County is relying on in part for this planning project (SCAG Awards $35 Million In Infrastructure Funding To Help Local Jurisdictions Meet Housing Goals | Southern California Association of Governments) describes the grant as follows: **"County of Riverside. Cabazon Infrastructure Plan** ($997,500). The county will conduct an infrastructure assessment for the unincorporated community of Cabazon to help coordinate the expansion of utility infrastructure necessary for up to 1,484 housing units of high-density residential development." There is an enormous difference between 1,484 units and 25,000 units. The EIR must explain the basis of the 25,000 unit planning projection, particularly because that number exceeds the SCAG indication for the area's growth by approximately 1,650%. It is also notable that the 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy of the Southern California Association of Governments growth forecast for all of unincorporated Riverside County was an increase of 42,400 households between 2019 and 2050. (Connect SoCal 2024: Demographics & Growth Forecast Technical Report, Adopted, April 4, 2024). While households and dwelling units are not the same unit of measurement, it is more likely that the number of dwelling units exceeds the number of households rather than vice versa. It is essential that the EIR explain and document why such an inordinately high level of growth is being planned for in the Cabazon area rather than being more widely distributed across other unincorporated areas.

While we can acknowledge that California is in the midst of an affordable housing crisis, we can best address that crisis equitably and sustainably by being thoughtful about where we place new housing and minimizing harms to native habitats and community health. Land use policies should prioritize placing people near existing resources and infrastructure where there is access to good jobs, schools, public transportation, water availability, and parks that provide the basic resources needed for healthy and resilient communities.

Smart sustainable land use policy is the best way to meet California's affordability crisis without sacrificing community and environmental health.

Major Issues That Must be Addressed in the EIR

1. **Address the Full Range of Impacts from the Physical Development and Population Growth Supported/Facilitated by the Proposed Project (CCP, CIP, and Land Use Map, as well as the projects proposed in the Draft Infrastructure Financing Plan, County of Riverside Cabazon Enhanced Infrastructure Financing District, August 22, 2025 (IFP) The projects included are identified in Table 2 of the IFP for projects directly funded by the Enhanced Infrastructure Financing District and of every project anticipated in the IFP (Table 1 in the attached) but funded by the development allowed by the proposed CCP/CIP and Land Use Map.**

The project has the potential to impact a wide range of issues that require analysis under CEQA. The project is intended to accommodate potential construction of up to 25,000 housing units and provide for an unknown number of new commercial, industrial, and business enterprises and their associated jobs, requiring an unknown number of commute-miles. The Program EIR needs to evaluate the direct, indirect, and cumulative effects from the growth accommodated and planned for in the CCP/CIP and Land Use Map as well as every project identified in Table 2 of the Draft Infrastructure Financing Plan (IFP) and every project anticipated in Table 1 of that plan as these are dependent on the growth planned for and accommodated by the CCP/CIP and Land Use Map. There is a causal chain here: the County established an Enhanced Infrastructure Financing District (EIFD); then drafted an IFP intended to fund extensive projects and reliant on a high level of growth to help fund those and other projects arising from that growth; and now sets out to approve a CCP/CIP and Land Use Map General Plan Amendment necessary to implement the IFP resulting from the EIFD because Section 53398.63 of the California Government Code requires that the IFP be consistent with the applicable General Plan, i.e. the Riverside County General Plan. The Program EIR must, therefore address all effects arising from that causal chain of actions by the County. For the Program EIR, these include Air Quality, Biological Resources, Cultural Resources, Energy, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Noise, Population and Housing, Public Services, Recreation, Transportation, Tribal Cultural Resources, Utilities and Service Systems, Wildfire, Growth Inducement, Land Use and Planning.

The Program EIR must include the Draft IFP projects to be consistent with CEQA Section 15168 which provides in part (see especially provisions in bold italics):

15168. PROGRAM EIR
(a) General. A program EIR is an EIR which may be prepared on a series of actions that can be characterized as one large project and are related either:
(1) ***Geographically***,
(2) ***As logical parts in the chain of contemplated actions,***
(3) In connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program, or
(4) As individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways.
(b) Advantages. Use of a program EIR can provide the following advantages. The program EIR can:
(1) ***Provide an occasion for a more exhaustive consideration of effects and alternatives than would be practical in an EIR on an individual action,***
(2) **Ensure consideration of cumulative impacts that might be slighted in a case-by-case analysis,**
(3) Avoid duplicative reconsideration of basic policy considerations,
(4) ***Allow the Lead Agency to consider broad policy alternatives and program-wide mitigation measures at an early time when the agency has greater flexibility to deal with basic problems or cumulative impacts***, and
(5) Allow reduction in paperwork.

2. Consistency with the CVMSHCP and the WR-MSHCP.
The EIR for the proposed CCP and CIP must be consistent with the provisions of the CVMSHCP and the WR-MSHCP, including but not limited to the Cabazon Conservation Area Conservation Goals and Objectives and the Required Measures of the CVMSHCP and the Special Linkage of the WR-MSHCP. The EIR must address these consistency issues.

We submit that doing so will necessitate a complete hydrology study and consultation with the Coachella Valley Conservation Commission(CVCC) which oversees implementation of the CVMSHCP and has expertise regarding CVMSHCP provisions and requirements for consistency, including expertise in evaluating potential impacts to Conservation Area Conservation Goals and Objectives through the Joint Project Review (JPR) process.

A large step towards defining what constitutes maintaining the environmental quality of the Community of Cabazon was the adoption of the CVMSHCP. A significant portion of the Proposed CCP and CIP area is within the Cabazon Conservation Area delineated in the CVMSHCP. The CVMSHCP sets specific Conservation Goals and Objectives for the Cabazon Conservation Area and delineates Required Measures for meeting them. As a signatory to the Implementing Agreement for the CVMSHCP, the County is obligated to approve only land use plans that have been determined to be consistent with the Conservation Goals and Objectives and meet the Required Measures. It would be counter-productive and ineffective advanced planning for the County to adopt a CCP, CIP, and Land Use Map that were inconsistent with the CVMSHCP; so, it becomes an essential question for the EIR to evaluate: are the CCP, CIP, and accompanying Land Use Map (General Plan land use designations) consistent with the Cabazon Conservation Area Conservation Goals and Objectives and the Required Measures. This is important because the County does not inadvertently want to be in the position of approving a CCP, CIP, and Land Use Map that appear to allow development which when actually proposed turns out to be inconsistent with the CVMSHCP and which the County could not, therefore, approve. Further, as the County knows, if the CCP, CIP, and Land Use Map turn out to be inconsistent with the Cabazon Conservation Area Conservation Goals and Objectives and the Required Measures, the County would be in violation of its obligations as a signatory to the CVMSHCP Implementation Agreement, and the CCP, CIP and Land Use Map would be legally vulnerable. This is in no one's best interests.

The Proposed CCP Land Use Map significantly changes the existing Land Use designations (those in effect when the CVMSHCP was adopted) for areas within the Cabazon Conservation Area. It is not possible from the maps provided in the NOP to determine precisely what those changes are and how extensive they are. It appears, however, as an example of the proposed change that in one area some 656.37 acres currently designated Rural Mountainous (1 unit per 10 acres) would be changed to Low Density Residential (1 unit per 1.5 acres). This would accommodate up to 985 units where at present the maximum would be 65. This is a more than 1500% increase in density. Similarly, it appears that in a fluvial sand transport area, the CCP Proposed Land Use Map increases the land use designation from Rural Desert (1 unit per 10 acres) to a combination of Rural Residential (1 unit per 5 acres), Low Density Residential (1 unit per acre), and some even higher densities. The EIR must quantify exactly what the proposed changes to Land Use (general plan land use designation) in the Conservation Area are and assess the potential environmental impacts of those density increases. One critical measure of those impacts is evaluating the potential effect of those changes on meeting the Conservation Area Conservation Goals and Objectives, in particular the sand transport function, and in

demonstrating how the Cabazon Conservation Area Required Measures will be implemented.

CVMSHCP "Section 4.2.2.2.4 Conservation of Fluvial Sand Transport Process within Conservation Areas" states:

> *Also, as part of their mitigation obligations, the Local Permittees will protect the fluvial sand transport Essential Ecological Process in the Cabazon, Long Canyon, and West Deception Canyon Conservation Areas to ensure no net reduction in fluvial sand transport in these areas. Figure 4-5 depicts these areas. The Permittees will require that natural flows onto parcels in the fluvial sand transport areas shall be conveyed offsite in the natural pre-disturbance direction of flow. This ensures that Development on the property shall not impede water-borne sand transport across the parcel in its natural direction of flow. In addition, water-borne sediments and floodwaters shall not be artificially retained onsite. Concentration of flows and increase in flow velocity offsite shall be minimized to avoid downstream erosion and scour. Alternatively, a flood control structure for the area that is designed to ensure no net reduction of sediment transport from the sand source area to the sand deposition area where aeolian sand transport processes are active may be used to achieve the Conservation Objective of fluvial sand transport. Construction of such flood control structures, unless identified as Covered Activities in Section 7.3, will require a Minor Amendment to the Plan with Wildlife Agencies' concurrence, as set forth in Section 6.12.3 of the Plan. Sections 4.3.1, 4.3.10, and 4.3.13 provide additional information on the protection of fluvial sand transport processes in the Cabazon, Long Canyon, and West Deception Canyon Conservation Areas. The fluvial sand transport processes occur on a total of 7,800 acres in these three 4-15 Final Major Amendment to the CVMSHCP – August 2016 Conservation Areas. While there is Habitat (but not Core Habitat) for some of the Covered Species in these areas, it is already fragmented and subject to significant edge effects by existing Development. As a result, there are no Conservation Objectives for Habitat in the areas consisting of the 7,800 acres. The only Conservation Objective for these areas is to maintain fluvial sand transport as described above. Development consistent with ensuring no net loss of fluvial sand transport may occur in these areas, and such Development is a Covered Activity under the Plan and Permits.*

To accomplish the required analysis in the EIR regarding fluvial sand transport, a hydrology study is essential. The County should consult with Coachella Valley Conservation Commission (CVCC) regarding the specific requirements of that hydrology study in order to ensure that the EIR adequately addresses the project's impacts on the requirement to

conserve fluvial sand transport. It would behoove the County and the EIR consultant to seek a pre-project consultation with CVCC as soon as possible as that would inform the EIR analysis.

In addition to the above, the EIR must specifically address each of the Cabazon Conservation Area Conservation Goals and Objectives stated in CVMSHCP Section 4.3.1 in terms of how the CCP, CIP, and proposed Land Use Map would be expected to be either consistent with or inconsistent with each Goal and Objective. Consultation with the CVCC as part of the Programmatic EIR process is essential, as CVCC is the responsible agency for CVMSHCP implementation and could use its information data base and analytic tools to help evaluate how the type of development envisioned by the proposed CCP, CIP, and Land Use Map could impact the Conservation Area and help identify the issues such envisioned development could encounter in ensuring consistency with the Conservation Area Conservation Goals and Objectives. Of particular importance are ensuring that sand transport continues along the San Gorgonio River for the Snow Creek/Windy Point Conservation Area and the Whitewater Floodplain Conservation Area; and maintaining the Biological Corridor linking the San Bernardino and San Jacinto Mountain Ranges. Additionally, the EIR should assess what potential impacts the CCP, CIP, and Land Use Map have on the County's ability to implement the Required Measures stated in Section 4.3.1 of the CVMSHCP.

The County should request CVCC to conduct a Joint Project Review (JPR) of the proposed Land Use Map in conjunction with the EIR process. The CVMSHCP is of critical importance to the Coachella Valley area, including the Community of Cabazon. The CVMSHCP provides conservation certainty and compliance with the state and federal Endangered Species Acts and the California Natural Community Conservation Planning Act, thus enabling authorized development to proceed efficiently when in compliance with the CVMSHCP. A critical component of that compliance is the JPR process.

CVMSHCP Section 6.6.1, Obligations of the Local Permittees, includes among those obligations that within Conservation Areas the Local Permittees shall "Ensure achievement of the Plan's Conservation Goals and Objectives and Required Measures in each Conservation Area identified in Section 4.3 and attainment of the Species Conservation Goals and Objectives identified in Section 9"; and shall "Participate in the Joint Project Review Process for projects within Conservation Areas as described in Section 6.6.1.1 and implement the Land Use Adjacency Guidelines described in Section 4.5." Section 6.6.1.1 of the CVMSHCP states, "For purposes of overseeing compliance with the requirements of the MSHCP and the IA, a Joint Project Review Process shall be instituted by CVCC for all projects under the Local Permittees' jurisdiction in a Conservation Area that would result in

disturbance to Habitat, natural communities, Biological Corridors, or Essential Ecological Processes. O&M of Covered Activities is not subject to the Joint Project Review Process. This process shall in no way limit the Local Permittees' land use authority. The purpose of the Joint Project Review Process is to allow CVCC to facilitate and monitor implementation of the MSHCP." Section 6.6.1.1 also logically stresses that a JPR is needed as early as possible in the planning process to ensure that alternatives are fully evaluated to achieve Conservation Area Conservation Objectives prior to public release of environmental documents prepared pursuant to CEQA.

Because portions of the Proposed CCP and CIP are in the Cabazon Conservation Area and the CCP, CIP, and Land Use Map fit the definition of "project", the Cabazon Plan must be submitted to the CVCC for a JPR. The definition of "project" in the California Public Resources Code section 21065 is**:**

> *"Project" means an activity which may cause either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment, and which is any of the following:*
>
> *(a) An activity directly undertaken by any public agency.*
>
> *(b) An activity undertaken by a person which is supported, in whole or in part, through contracts, grants, subsidies, loans, or other forms of assistance from one or more public agencies.*
>
> *(c) An activity that involves the issuance to a person of a lease, permit, license, certificate, or other entitlement for use by one or more public agencies.*

It is certainly clear that the Proposed CCP and CIP may cause reasonably foreseeable indirect physical change in the environment; that is the very purpose of the Plan; and it is clearly an activity directly undertaken by the County of Riverside.

The Implementing Agreement (IA) of the CVMSHCP states in Section 13.2, County and Cities Obligations, that "The County and the Cities have the following obligations under the MSHCP and this Agreement:

> *F. Participate in the Joint Project Review Process set forth in Section 6.6.1.1 of the MSHCP for projects in the Conservation Areas."*

It is also notable that IA Section 20.2, Land Use Changes, states, "The Parties agree that the adoption and amendment of general plans, specific plans, community plans, zoning ordinances and similar land use ordinances, and the granting of implementing land use

entitlements by the County and the Cities are matters within the sole discretion of the County and Cities and shall not require amendments to this Agreement or the approval of other Parties to this Agreement. *However, the Parties agree that: 1) no such action by the County or the Cities shall in any way alter or diminish their obligations under this Agreement, the MSHCP, or the Permits, and 2) approval of certain projects may lead to revocation or suspension of the Permits pursuant to Section 23.5 of this Agreement*. (emphasis added)"

Failure to comply with the IA could result in undesirable consequences, up to and including Take Authorization suspension or revocation. More to the point, participating in the JPR process provides significant planning benefits through its careful analysis of how any contemplated Plan provisions and actions would, or would not, comply with the CVMSHCP's Conservation Goals and Objectives and Required Measures for the affected Conservation Area. From both a conservation and a future development perspective this is an invaluable benefit.

The Proposed CCP, CIP, and associated Land Use Map is within the Special Linkage Area between the San Bernardino and San Jacinto Mountains described in Section 3.3.10 of the WR-MSHCP. As such, proposed projects within the Special Linkage area must address and analyze consistent with CEQA § 21083.09, not just the WR-MSHCP. As stated in the WR-MSHCP:

> *"Special Linkage Area: This Special Linkage Area will contribute to assembly of a portion of the San Gorgonio River/San Bernardino-San Jacinto Mountains Linkage. Tribal coordination regarding American Indian Lands will be necessary in this area. The San Gorgonio River/San Bernardino-San Jacinto Mountains Linkage includes locations within and outside the MSHCP Plan Area. Features of the entire linkage area are described in Missing Linkages: Restoring Connectivity to the California Landscape (Penrod, K., November 2, 2000). A copy of this report is attached as Exhibit 24 to Comment Letter D in Volume V of the MSHCP. Local Permittees will apply the following rebuttable presumption of significance, taken from Appendix G to the 1998 State CEQA Guidelines, in CEQA review of proposed public and private projects within this Special Linkage Area and apply mitigation measures as appropriate: "Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?" Draft and Final CEQA documentation prepared by Local Permittees for projects within this Special Linkage Area will be forwarded to the RCA for*

informational purposes to provide for MSHCP coordination regarding this area." (MSHCP 2004)

The proposed CCP, CIP and Land Use Map have the potential to interfere substantially with movement of native species. The EIR must address direct, indirect, and cumulative impacts. The Special Linkage Area is already expected to be further constrained by the build out of two recently approved massive spec-warehouse projects immediately adjacent to one another: First Hathaway (1.32 million square foot project) and Banning Commerce Warehouse Project (1.42 million square foot), which are within or partially within the CCP and CIP area. The County must analyze potential impacts of the Proposed CCP, CIP and Land Use Map to wildlife movement in the Special Linkage Area of the WR-MSHCP, as well as potential impacts to wildlife movement between the WR-MSHCP and the CVMSHCP since the Special Linkage Area serves as a connection between these MSHCPs.

Furthermore, special-status species covered by both the WR-MSHCP and the CVMSHCP and sensitive habitats that occur in, near, and downstream may be significantly impacted by the Proposed CCP, CIP and Land Use Map and must be addressed in the EIR. Special status species may be significantly impacted by habitat loss and fragmentation, and increases in traffic, noise and light, which may degrade existing habitat and constrict wildlife movement. For example, many of the connections for wildlife are along washes and drainages, which are also important connections for sand transport and flow from sand sources in the surrounding mountains. The importance of sand flow along alluvial systems for sustaining habitat for many listed and endemic species, such as the fringe-toed lizard (*Uma inornata*) that relies on sand dunes, cannot be overstated.

3. *Potential Impacts to Regionally Important Linkages and Conservation Lands Beyond the Immediate Project Area*.

CEQA requires that the EIR address direct, indirect and off-site impacts, and cumulative impacts. The Proposed CCP and CIP area, as made clear in the adoption of the CVMSHCP and WR-MSHCP as well as in other scientific literature, overlaps areas essential to sustaining ecological processes that are crucial to the ecological health of many areas both within and beyond the Project Area. For example, the CCP and CIP area is both a sand source and sand transport area along the San Gorgonio River, and its tributaries, of critical importance to maintaining the Snow Creek/Windy Point Conservation Area and the Whitewater Floodplain Conservation Area. Similarly, as a regionally important linkage between the Transverse Range and the Peninsular Range, portions of the CCP and CIP area are of critical importance for many species in a much larger area. The potential impacts of

project build-out, i.e., a full development allowed, facilitated, and anticipated by the proposed CCP, CIP, and Land Use Map on these areas is enormous and of grave importance, and must be assessed by the EIR. In this vein, the EIR must assess the potential for direct, indirect, off-site, and cumulative impacts on other Conservation Areas in the CVMSHCP, in particular the Snow Creek/Windy Point Conservation Area and the Whitewater Floodplain Conservation Area, the regionally important San Bernardino-San Jacinto Linkage, and the Santa Rosa/San Jacinto Mountains Conservation Area. Failure to do so will make the EIR inadequate as well as jeopardizing the ecological integrity of the CVMSHCP, WR-MSHCP, and other regionally important existing conservation investments.

The EIR must assess direct, indirect, and cumulative impacts to wildlife movement as required by CEQA. The Proposed CCP and CIP have the potential to interfere substantially with movement of native species through the San Bernardino-San Jacinto Linkage (Penrod et al. 2005), which overlaps the Special Linkage Area of the WR-MSHCP and Six of the CVMSHCP Conservation Areas, which from west to east include: Cabazon, Stubbe and Cottonwood Canyons, Snow Creek Windy Point, Whitewater Canyon, Highway 111, and Whitewater Floodplain.

The San Bernardino-San Jacinto Linkage (Penrod et al. 2005), first identified at the landmark California Missing Linkages: Restoring Connectivity to the California Landscape (Penrod et al. 2001), is one of several regionally important connections in the South Coast Missing Linkages Network (Beier et al. 2006, SC Wildlands 2008), which is widely considered the backbone of a regional conservation strategy for southern California. The South Coast Missing Linkages Network stitches together over 18 million acres of existing conservation lands, and maintaining connected wildlife populations from Baja California Norte to the southern Sierra Nevada, and from the beaches of Camp Pendleton eastward to the deserts of Anza-Borrego Desert State Park.

The San Bernardino-San Jacinto Linkage is an essential landscape connection for north-south connectivity through the South Coast Ecoregion, providing connectivity between mountain ranges within the Transverse Ranges (Santa Ynez, Santa Monica, San Gabriel, and San Bernardino Mountains) and Peninsular ranges (San Jacinto, Santa Ana, Palomar, and Laguna Mountains, and the Sierra Juarez of Baja California). The San Bernardino Mountains are part of the east-west trending Transverse Ranges and feature the highest peak in southern California, Mount San Gorgonio, while the San Jacinto Mountains are the highest and northernmost of the Peninsular Ranges. Both coastal and desert habitats occur in the lowlands between these mountain masses, with the San Gorgonio River marking the transition between these major vegetative zones. As such, the San Gorgonio

Pass area is expected to serve a critical function as the climate warms and desert species move westward into the Pass to seek cooler, more suitable habitat.

In addition, because this regionally important linkage is situated where the Transverse and Peninsular Ranges converge, and in an ecological transition zone between the South Coast and Sonoran ecoregions, it is considered a contact zone for many subspecies. This interchange of genetic material is most prevalent among mammals and reptiles, such as the little pocket mouse (*Perognathus longimembris brevinasus and P.l. bangsi*) (Williams 1986), and western patch-nosed snake (*Salvadora hexalepis hexalepis and S.h. virgultea*) (Stewart and Hogan 1980). The San Gorgonio Pass has been identified as a hotspot of genetic diversity and evolution (Vandergast et al 2008). The San Bernardino-San Jacinto Linkage is situated at a unique evolutionary crossroads where genetic interactions occur at multiple temporal and spatial scales.

In addition to providing habitat for rare and endangered species and a contact zone where species intergrade along a genetic continuum, the linkage provides live-in and move-through habitat for numerous other native species that require extensive wildlands to thrive, such as American badger, mule deer, and mountain lion. The 2-km minimum corridor width (Penrod et al. 2005) is expected to provide live-in habitat for all but the most wide-ranging species (e.g., mountain lion) and ensure the ecological integrity of the linkage over time (Penrod et al. 2005).

The San Bernardino-San Jacinto Linkage (Penrod et al. 2005) serves as the only viable connection between the Transverse and Peninsular ranges subpopulations of mountain lion, which was recently listed as Threatened under the California Endangered Species Act (CESA). California Department of Fish and Wildlife (CDFW) have recently documented GPS-collared mountain lions within the Proposed CCP and CIP area, traversing habitat in the foothills of the San Bernardino Mountains and Pass area to approach I-10, from the San Gorgonio River to Whitewater River. Conservation of this linkage is essential to ensure the long-term genetic viability of mountain lions in Southern California (Guftason et al. 2022). Because the Transverse Range's mountain lion population is located at the intersection of the Coast Range, Sierra Nevada and Peninsular Ranges mountain lion populations, it is considered critical to sustaining statewide mountain lion gene flow. Habitat protection and improvements to I-10 are needed to secure this critically important linkage for mountain lions and a host of other species, including species covered by the CVMSHCP and WR-MSHCP.

In fact, the CVCC received a Natural Communities Conservation Plan 30 x 30 Grant from CDFW for a "Wildlife Connectivity Assessment for Interstate 10 and Closely Associated Transportation Infrastructure in the Banning Pass" (CVCC FY19/20 Meeting Schedule). The project was initiated in March 2024 and is expected to be completed by March 2026. As described in the CVCC Staff Report (1/11/2024):

> *This project will collect much needed data that will proactively identify threats to connectivity and facilitate connectivity design options and mitigation for future Caltrans-led and County-led projects along the Banning Pass section of Interstate 10 (I-10) within Riverside County. One of the primary goals of the Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP) is to provide biological corridors and linkages between habitat patches. One of these corridors is between the Peninsular Range of the San Jacinto and Santa Rosa Mountains and the San Bernardino Mountains portion of the Transverse Range. A portion of this extremely significant corridor utilizes culverts and bridges under I-10 and parallel railroad and surface streets that connect the San Bernardino Mountains to the San Jacinto Mountains through the Cabazon, Stubbe-Cottonwood, and Whitewater Conservation Areas to the Snow Creek/Windy Point, Hwy 111 Conservation Area. The objectives of the CVMSHCP envision use by predators and large mammals, including coyotes, bobcats, mountain lions and foxes. However, small vertebrates and corridor dwellers also use these corridors although it may take generations for a population to traverse from one side of the I-10 to the other. Connectivity is supposed to facilitate genetic flow, demographic dispersal among these species, help maintain predator-prey relationships and facilitate climate adaptation.*
>
> *Caltrans has conducted various wildlife corridor and movement studies throughout the state, including a wildlife connectivity assessment for nearby State Route 62. In 2013, Murphy-Mariscal completed a study for CVCC through the UC Riverside Center for Conservation Biology documenting that a wide variety of species used the I-10 underpasses, and those results were included in the 2013 Annual Report. The grant funded project will create a wildlife connectivity resource similar to that prepared for the nearby SR 62 that Caltrans and Riverside County staff can reference for future projects within the region. The information generated by this project will build on the results of the 2013 study and assist in identifying key landscape connections for wildlife movement adding to the collective knowledge of how effective these crossings may or may not be for different species in order to facilitate the species goals of the CVMSHCP. This project highlights a critical opportunity to develop connectivity design recommendations as Caltrans, the*

County, Union Pacific Railroad and other agencies consider upgrades to the current infrastructure in the study area. Specific knowledge provided by this study will inform design measures for existing road/railway crossing structures and approach areas to enhance connectivity for large/medium mammals, small mammals, and reptiles, and will specifically consider measures to enhance connectivity for CVMSHCP-covered species listed above that are expected to use these corridors.

Existing bridges and culvert structures are only choke-points in landscape level connections. As such, existing structures in the San Bernardino-San Jacinto Linkage should not be the sole criteria for determining whether the Proposed CCP and CIP would impact wildlife movement. In fact, the CDFW has identified two Priority Wildlife Movement Barriers (W057 I-10 San Gorgonio River and W058 I-10 Banning Pass) for remediation on Interstate 10 that span the entire length of the Proposed Project and beyond (Terrestrial Wildlife Connectivity Barriers). Furthermore, Caltrans has identified Interstate 10 through the entire San Gorgonio Pass for Advanced Mitigation (Thirteen Ecoregion Subsections of the Southern California Coast and Southern California Mountains and Valleys Regional Advance Mitigation Needs Assessment ("RAMNA"). In addition, Caltrans District 8 is currently working on improvements to the Itta Wash culvert within the CCP and CIP to address climate adaptation measures (Caltrans 2020) and wildlife movement, pursuant to AB2344 and Section 158 of the Street and Highways Code Barriers to Wildlife Movement (California Code, Streets and Highways Code - SHC § 158 | FindLaw).

The EIR must adequately analyze potential impacts to wildlife movement for resident and migratory species to be consistent with CEQA § 21083.09. For example, how would the proposed CCP, CIP and Land Use Map constrain live-in and move-through habitat for the "covered species" and other target species?

4. Project Alternatives.

The CCP, CIP and Proposed Land Use Map are intended to provide a dramatic increase in housing (up to 25,000 new units) and infrastructure to accommodate projected significant population growth. The EIR should speak to the assumptions of these projections and how their derivation considered and addressed potential environmental impacts in order to maintain robust ecosystems and environmental quality while accommodating the projected growth. Did the development of the growth forecasts consider the CVMSHCP? If so, how? If not, then an analysis is imperative now of what the options are for accommodating the projected growth while continuing to meet the CVMSHCP's Conservation Goals and Objectives for the area. What is the requirement that 25,000 new units be accommodated precisely in the CCP area? Could some of them be located in the

city limits of Banning, Beaumont, Palm Springs, Desert Hot Springs, or elsewhere? If it were determined that the development of 25,000 units in this area would not be consistent with the Cabazon Conservation Area Conservation Goals and Objectives, could the County develop a CCP that accommodated enough fewer units to maintain consistency with the Cabazon Conservation Area Conservation Goals and Objectives?

One of the project alternatives should explicitly retain the Land Use (General Plan) designations in effect at the time of CVMSHCP adoption on all parcels in the Cabazon Conservation Area. Those parcels within the CCP but not within the Cabazon Conservation Area could be assigned Land Use (General Plan) designations to meet the project goals while also ensuring they met the CVMSHCP's Land Use Adjacency Guidelines. The EIR analysis of this alternative should assess if the alternative as a whole would be consistent with all the Conservation Area Conservation Goals and Alternatives and would meet the Required Measures in Section 4.3.1 of the CVMSHCP. This alternative should also explicitly address if the land uses proposed on parcels adjacent to the Conservation Area would meet the Land Use Adjacency Guidelines in Section 4.5 of the CVMSHCP. Note that this is not a No Project alternative because it does allow Land Use designation and policy changes on all parcels in the CCP not within the Cabazon Conservation Area.

5. **Consistency with the Existing General Plan.**

As a component of the assessment of consistency with the CVMSHCP and the WRMSHCP, the EIR inevitably must also address the CCP, CIP, and Land Use Map's internal consistency with the existing County General Plan. The CCP and CIP are proposed as a General Plan Amendment (GPA), but a GPA must be found to be consistent with the existing General Plan. The GPA cannot simply amend some parts of the existing General Plan if such amendment is inconsistent with any element of the existing General Plan. Thus, the EIR needs to consider how the proposed GPA might impact all elements of the existing General Plan. Of particular concern are policies OS 17.1, OS 17.3, and OS 18.1 of the Multipurpose Open Space Element. OS 17.1 in part states, "Enforce the provisions of applicable MSHCP's and implement related Riverside County policies when conducting review of possible legislative actions such as general plan amendments, zoning ordinance amendments, etc..." OS 17.3 states, "Enforce the provisions of applicable MSHCP's and implement related Riverside County policies when developing transportation or other infrastructure projects that have been designated as covered activities in the applicable MSHCP." OS 18.1 states, "Riverside County's multipurpose open space system will be created and maintained using several different techniques, all related to preservation of significant environmental resources...This section identifies policies for the preservation of environmentally sensitive land within the County of Riverside, including, but not limited to,

the land to be preserved through the MSHCPs. Preserve multi-species habitat resources in the County of Riverside through the enforcement of the provisions of applicable MSHCP's and through implementing related Riverside County policies."

Additionally, the County must analyze the extent to which the CCP and CIP would exacerbate environmental injustice in conflict with the Land Use and Healthy Communities Elements of the County's General Plan, consistent with General Plan Amendment No. 190004 and the County's obligations under SB 1000 (2016). Cabazon falls within the designated West Desert environmental justice community, and the area already suffers from high levels of traffic related air pollution. For example, according to statewide data, the census tract for Cabazon is in the 95th percentile for ozone, with areas in neighboring Banning in the 96th for diesel particulate matter (CEPA 2026). Given these conditions, the truck traffic intensification that would follow the proposed heavy industrial expansion of over 1,200 acres raises serious environmental justice concerns that must be adequately addressed in the EIR.

Sincerely,

Kristeen Penrod
Director
SC Wildlands

Seth Alston
Associate Attorney Urban Wildland Program
Center for Biological Diversity

Warner Graves
Resident
Community of Snow Creek

Dan Silver
Executive Director
Endangered Habitats League

Kevin Wong
Executive Director
Friends of Big Morongo Canyon Preserve

Bettina Rosmarino
Land Acquisition Director
Oswit Land Trust

Mary Ann Ruiz
Conservation Chair
Sierra Club San Gorgonio Chapter

Jack Thompson
California Desert Regional Director
The Wildlands Conservancy

Mari Galloway
California Program Director
Wildlands Network

Literature Cited:

Beier, P.B., K.L. Penrod, C.L. Luke, W.D. Spencer, and C.R. Cabanero. 2006. South Coast Missing Linkages: restoring connectivity to wildlands in the largest metropolitan area in the United States. In KR Crooks and MA Sanjayan, editors. Connectivity and Conservation. Oxford University Press.

California Department of Fish and Wildlife. 2025. Report to the California Fish and Game Commission A Status Review of the Petitioned Southern California/Central Coast Evolutionarily Significant Unit (ESU) of Mountain Lion (Puma concolor couguar) in California. A Status Review of the Petitioned Southern California/Central Coast ESU of Mountain Lion in California.

California Department of Fish & Wildlife (CDFW). 2024. Wildlife Movement Barriers - CDFW [ds2867]. https://filelib.wildlife.ca.gov/Public/BDB/GIS/BIOS/Public_Datasets/2800_2899/ds2867.zip

California Environmental Protection Agency Office of Environmental Health Hazard Assessment (CEPA). 2026. Update to the California Communities Environmental Health Screening Tool Draft CalEnviroScreen 5.0 Public Review Technical Report DATE JANUARY 2026

Gustafson, K.D., R.B. Gagne, M.R. Buchalski, T.W. Vickers, S.P.D. Riley, J.A. Sikich, J.L. Rudd, J.A. Dellinger, M.E.F. LaCava, and H.B. Ernest. 2022. Multi-population puma connectivity could restore genomic diversity to at-risk coastal populations in California. Evolutionary Applications 2022;00:1–14.

Penrod, K., C. Cabañero, P. Beier, C. Luke, W. Spencer, and E. Rubin. 2005. South Coast Missing Linkages Project: A Linkage Design for the San Bernardino-San Jacinto Connection. South Coast Wildlands, Idyllwild, CA. www.scwildlands.org.

Penrod, K., R. Hunter, and M. Marrifield. 2001. Missing Linkages: restoring connectivity to the California landscape. California Wilderness Coalition, The Nature Conservancy, US Geological Survey, Center for Reproduction of Endangered Species, and California State Parks.

South Coast Wildlands (SC Wildlands). 2008. South Coast Missing Linkages: A Wildland Network for the South Coast Ecoregion. Produced in cooperation with partners in the South Coast Missing Linkages Initiative. Pp. 67 + appendices. Report available online at http://www.scwildlands.org. [GIS dataset; Feature Layer South_Coast_Missing_Linkages.shp; SDE Feature Class ds419]. Link to metadata and data South Coast Missing Linkages [ds419] GIS Dataset (ca.gov).

Stewart, G.R. and D.E. Hogan. 1980. Herpetofauna of the Whitewater project area:Inventory and impact assessment. Unpublished report prepared for U.S. Army Corps of Engineers. California State Polytech. University, Pomona.

Vandergast, Amy & Bohonak, Andrew & Hathaway, Stacie & Boys, Joshua & Fisher, Robert. (2008). Are hotspots of evolutionary potential adequately protected in southern California?. Biological Conservation. 141. 1648-1664. 10.1016/j.biocon.2008.04.009.

Williams, D.F. 1986. Mammalian species of special concern in California. Wildlife Management Division Administrative Report 86-1. Department of Fish and Game.

South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL: April 8, 2026
CabazonPlan@rivco.org
Candice Hughes, District 5 Principal Planner
County of Riverside
1080 Lemon Street 12th Floor
Riverside, CA 92502

Notice of Preparation of a Draft Program Environmental Impact Report (Draft PEIR) for the Cabazon Infrastructure Plan and Cabazon Community Plan Project (Proposed Project) (SCH# 2026030377)

South Coast Air Quality Management District (South Coast AQMD) staff appreciate the opportunity to comment on the above-mentioned document. The following comments provide observations and may include recommendations on the analysis of potential air quality impacts from the Proposed Project that should be included in the Draft PEIR. Please transmit copy of the Draft PEIR upon its completion and public release directly to South Coast AQMD. **In the transmittal, please also provide electronic versions of all appendices and technical documents related to the air quality, health risk, and greenhouse gas analyses in their original format (e.g., not in .pdf), including but not limited to emission calculation spreadsheets, air quality modeling files, and health risk assessment input and output files.**

CEQA Air Quality Analysis

According to the Notice of Preparation of a Draft PEIR, the Proposed Project is a large-scale planning effort that would guide land use and infrastructure decisions over approximately 7,768 acres and prepare the Cabazon area for substantial future growth, including the potential for up to 25,000 housing units over the next 30 years. Since the upcoming Draft PEIR will need to analyze the potential environmental impacts of both the Cabazon Community Plan and corresponding Cabazon Infrastructure Plan, the Lead Agency is recommended to include an evaluation in the Draft PEIR of a reasonably foreseeable scenario which reflects the maximum development intensity that would be allowed under the proposed land use designations and associated infrastructure expansion at full buildout and disclose the air quality, greenhouse gas, and health risk implications of this growth to the fullest extent feasible.

When preparing the air quality and greenhouse gas analyses, the Lead Agency is recommended to rely on the guidance provided in the South Coast AQMD's CEQA Air Quality Handbook and website [1] and utilize the California Air Pollution Control Officers Association's California Emissions Estimator Model (CalEEMod)[2] software to quantify emissions of air pollutants from the land use development activities associated with the Proposed Project.

[1] South Coast AQMD's CEQA Air Quality Handbook and other resources for preparing air quality analyses can be found at: http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook.
[2] CalEEMod is available free of charge at: www.caleemod.com.

The Lead Agency should identify all air pollutant sources related to the Proposed Project and analyze/quantify any and all potential air quality and greenhouse gas impacts that could occur during all phases (including overlapping phases) of construction (including demolition) and operation activities associated with the future development that may result from implementing the Community Plan and making the associated infrastructure improvements identified in the Cabazon Infrastructure Plan. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips, and hauling trips). For the Proposed Project, construction-related emissions should also include infrastructure-related activities such as roadway improvements, wastewater and water system improvements, flood control and drainage improvements, utility expansion, and other infrastructure needed to support future growth. Operation-related air quality and greenhouse gas impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers and air pollution control devices), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality and greenhouse gas impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis. Furthermore, if the Lead Agency elects to rely on South Coast AQMD's Air Quality Significance Thresholds,[3] the emissions from the overlapping construction and operational activities should be combined and compared to South Coast AQMD's air quality significance thresholds for *operation* to determine the level of significance.

South Coast AQMD has developed a methodology [4] to assist lead agencies with analyzing localized air quality impacts from site-specific projects located near sensitive receptors. However, because scale of the Proposed Project is large and programmatic in nature, the screening tables which contain localized significance thresholds (LSTs) cannot be relied upon to determine localized impacts. Instead, the Lead Agency is recommended to evaluate the potential localized air quality impacts from the Proposed Project by conducting air dispersion modeling to determine whether the applicable ambient air quality standards would be exceeded.

If the Proposed Project generates diesel emissions from long-term construction or attracts diesel-fueled vehicular trips, especially if heavy-duty diesel-fueled vehicles will be used, the Lead Agency is recommended to perform a mobile source health risk assessment.[5]

Sensitive receptors are people that have an increased sensitivity to air pollution or environmental contaminants and include schools, daycare centers, nursing homes, elderly care facilities, hospitals, and residential dwelling units. The Proposed Project plans for substantial future residential growth and includes a mix of residential, commercial, mixed-use, light industrial, and heavy industrial land uses within an area that is bisected by Interstate 10 and the Union Pacific rail corridor. Therefore, the Lead Agency is recommended to evaluate the potential health risks to

[3] South Coast AQMD Air Quality Significance Thresholds can be found at: https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf.
[4] South Coast AQMD's guidance for performing a localized air quality analysis can be found at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds.
[5] South Coast AQMD's guidance for performing a mobile source health risk assessment can be found at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis

existing and future sensitive receptors from mobile and stationary sources of toxic air contaminants and disclose those potential health risks in the Draft PEIR. To the extent feasible, the Draft PEIR should identify areas where future sensitive land uses may be exposed to elevated levels of diesel particulate matter (DPM) and other air pollutants, and should include planning-level policies, siting considerations, and mitigation measures to reduce exposures.

Also, if implementation of the Proposed Project would require the use of new stationary and portable sources, including but not limited to emergency generators, fire water pumps, boilers, spray booths, wastewater-related equipment, electrical infrastructure, etc., one or more air permits from South Coast AQMD will be required, and the role of South Coast AQMD would change from a Commenting Agency under CEQA to a Responsible Agency as defined in CEQA Guidelines Section 15381. The assumptions in the air quality analysis in the EIR will be the basis for evaluating the air permit(s) under CEQA and imposing permit conditions and limits. Questions about air permit requirements should be directed to South Coast AQMD's Engineering and Permitting staff at (909) 396-3385.

In addition, CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency, including making a decision on the adequacy of the CEQA document for use as part of evaluating the applications for air permits. For these reasons, the Draft PEIR should include a discussion about any new stationary and portable equipment requiring South Coast AQMD air permits and identify South Coast AQMD as a Responsible Agency for the Proposed Project, if applicable. Also, as set forth in CEQA Guidelines Section15086, the Lead Agency is required to consult with all Responsible Agencies with discretionary approval authority over the Proposed Project. Thus, if air permits are required and South Coast AQMD is identified as a Responsible Agency, please let this comment letter serve as South Coast AQMD's request to convene a meeting with the Lead Agency as required by CEQA Guidelines Section 15104 to discuss the scope and content of the environmental information that will need to be included in the Draft PEIR.

To assist with identifying ways to minimize air quality impacts from the Proposed Project, the Lead Agency is also recommended to consult and apply the guidance from the California Air Resources Board (CARB) *Air Quality and Land Use Handbook: A Community Health Perspective,*[6]which is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process. CARB has another helpful technical advisory, *Strategy to Reduce Air Pollution Exposure Near High-Volume Roadways*, which contains additional guidance on strategies to reduce air pollution exposure of Proposed Projects located near high-volume roadways.[7]

Since the Proposed Project will involve local planning and land use decisions, the Lead Agency is recommended to review and consider applying the recommendations contained in the South Coast AQMD *Guidance Document for Addressing Air Quality Issues in General Plans and Local*

[6] CARB's *Air Quality and Land Use Handbook: A Community Health Perspective* can be found at: https://www.aqmd.gov/docs/default-source/ceqa/handbook/california-air-resources-board-air-quality-and-land-use-handbook-a-community-health-perspective.pdf.

[7] CARB's Strategy to Reduce Air Pollution Exposure Near High-Volume Roadways, April 2017, available at: https://ww2.arb.ca.gov/sites/default/files/2017-10/rd_technical_advisory_final.pdf.

Planning,[8] which includes suggested policies that local governments can use in their General Plans or through local planning to prevent or reduce potential air pollution impacts and protect public health.

The planning area of the Proposed Project will have future light industrial and heavy industrial land uses which may involve substantial emissions of criteria pollutants and toxic air contaminant emissions which could create concerns regarding land use compatibility with nearby sensitive receptors. The Lead Agency is recommended to include an evaluation of the potential air quality and health risk implications of these land use designations in the Draft PEIR by applying assumptions which reflect a full range of reasonably foreseeable industrial activities that could occur if the Proposed Project is implemented.

The Proposed Project also includes land use designations, such as light industrial and heavy industrial uses, that may facilitate future warehouse and other truck-intensive land uses capable of generating and attracting heavy-duty diesel-fueled trucks that emit DPM, a toxic air contaminant. The South Coast AQMD Multiple Air Toxics Exposure Study (MATES V), completed in August 2021, concluded that the largest contributor to cancer risk from air pollution sources is DPM emissions.[9] For this reason, South Coast AQMD staff is concerned about the potentially adverse public health impacts of siting new warehouses or expanding existing warehouses within close proximity of sensitive land uses, especially in communities located in or adjacent to multiple other existing warehouses and their associated truck activities. Since the Proposed Project would guide future development, the Draft PEIR should evaluate the potential for future warehouses and other truck-intensive uses and their contribution to cumulative DPM exposures in the vicinity of the Proposed Project. To the extent feasible, the Draft PEIR should also disclose existing cancer risk levels in the project area through the use of available tools such as the MATES V[10] carcinogenic risk interactive map, and evaluate how future development facilitated by the Proposed Project could contribute to cumulative health risks.

According to the MATES V carcinogenic risk interactive map, the area surrounding the Proposed Project appears to have an estimated cancer risk of 413 to 469 cases in one million across multiple grids.[11] When the health impacts from the Proposed Project are added to those existing impacts from these other sources of DPM, residents living in the communities surrounding the Proposed Project area will likely face an even greater exposure to air pollution and bear a disproportionate burden of increased health risks.

To minimize the impacts of DPM from the Proposed Project and avoid exacerbating existing conditions, the Lead Agency is encouraged to evaluate either quantitatively or qualitatively the potential health risk impacts to nearby sensitive receptors and if significant impacts are identified, to include mitigation measures in the Draft PEIR (which are discussed later in this letter) that would reduce or eliminate the DPM health risks to the surrounding community.

---

[8] South Coast AQMD. 2005. *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*. Available at: http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf.

[9] South Coast AQMD. August 2021. *Multiple Air Toxics Exposure Study in the South Coast Air Basin V*. Available at: http://www.aqmd.gov/home/air-quality/air-quality-studies/health-studies/mates-v.

[10] South Coast AQMD. MATES V Data Visualization Tool. Accessed at: MATES Data Visualization (arcgis.com).

[11] *Ibid.*

In addition, some warehouses could potentially be receiving and storing materials sterilized with ethylene oxide (EtO), a known carcinogen identified by CARB as a Toxic Air Contaminant and by the U.S. EPA as a Hazardous Air Pollutant. EtO is a flammable, colorless gas used in many industries to make products including antifreeze, textiles, solvents, detergents, and adhesives. EtO is also used to sterilize medical devices, the primary use within South Coast AQMD. Due to concerns of EtO off-gassing from sterilized materials and the associated warehouses that receive and store materials sterilized with EtO, there is a potential that some warehouses could emit EtO and pose a cancer risk to workers and nearby sensitive receptors.

Since the Proposed Project may facilitate future warehouse development, the Lead Agency is recommended to include a scenario in the Draft PEIR which analyzes the potential risk from EtO emissions associated with warehouse storage activities . The Lead Agency is also recommended to notify the project proponent, including the potential future tenants, if known, that if sterilization activities or related operations involving the storage or transport of materials sterilized with EtO are intended to occur at the Proposed Project site, such activities would be subject to the requirements of South Coast AQMD Rule 1405 – Control of Ethylene Oxide Emissions from Sterilization and Related Operations.[12] Rule 1405 contains a variety of requirements applicable to both facilities and certain large warehouses that receive EtO-sterilized products. For the latter, warehouse operators are required to provide records and emissions data through fenceline monitoring or emissions studies to help assess EtO emissions from warehouses. Rule 1405 is intended to minimize EtO emissions from these sources to protect public health, particularly in nearby communities that may be vulnerable to toxic air contaminants.

Lastly, for future development Projects that include warehouse uses involving EtO-sterilized materials, the Lead Agency is recommended to require a project-specific health risk assessment to evaluate the potential health risks from EtO emissions and include this information in the CEQA analysis to facilitate full disclosure of potential health risk impacts.

Mitigation Measures

In the event that the Proposed Project results in significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize these impacts. Any impacts resulting from mitigation measures must also be analyzed. Several resources to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project include South Coast AQMD's CEQA Air Quality Handbook,[13] South Coast AQMD's Mitigation Monitoring and Reporting Plan for the 2022 Air Quality Management Plan,[14] and Southern California Association of Government's Mitigation Monitoring and Reporting Plan for the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy.[15]

[12] South Coast AQMD, Rule 1405 – Control of Ethylene Oxide Emissions from Sterilization and Related Operations. Available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1405.pdf.

[13] South Coast AQMD's CEQA Air Quality Handbook, Available at:https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook

[14] South Coast AQMD's 2022 Air Quality Management Plan can be found at: http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan (Chapter 4 - Control Strategy and Implementation).

[15] Southern California Association of Governments' 2020-2045 RTP/SCS can be found at: https://www.connectsocal.org/Documents/PEIR/certified/Exhibit-A_ConnectSoCal_PEIR.pdf.

The Lead Agency is recommended to consider including mitigation measures and planning strategies for reducing operational and exposure-related air quality impacts from future development facilitated by the Proposed Project in the Draft PEIR, as follows:

- Avoid locating new sensitive land uses within close proximity to substantial sources of air pollution, including freeways, rail lines, heavy industrial uses, truck-intensive land uses, and other major emission sources, unless appropriate avoidance, minimization, and mitigation measures are incorporated.
- Incorporate planning-level policies and development standards that promote land use compatibility and reductions in air pollution exposure, such as setbacks, buffer areas, site design considerations, and separation between sensitive receptors and substantial air pollution sources.
- Encourage zero-emissions (ZE) or near-zero emission (NZE) on-road haul trucks such as heavy-duty trucks with natural gas engines that meet the CARB's adopted optional NOx emissions standard at 0.02 grams per brake horsepower-hour (g/bhp-hr), when feasible.. The Lead Agency should require a phase-in schedule to incentivize the use of these cleaner operating trucks to reduce any significant adverse air quality impacts. At a minimum, require the use of 2010 model year[16] that meet CARB's 2010 engine emissions standards at 0.01 g/bhp-hr of particulate matter (PM) and 0.20 g/bhp-hr of NOx emissions or newer, cleaner trucks. Include environmental analyses to evaluate and identify sufficient electricity and supportive infrastructures in the Energy and Utilities and Service Systems Sections in the CEQA document, where appropriate. Include the requirement in applicable bid documents, purchase orders, and contracts. Operators shall maintain records of all trucks associated with project construction to document that each truck used meets these emission standards, and make the records available for inspection. The Lead Agency should require regular inspections to be conducted to the maximum extent feasible to ensure compliance. South Coast AQMD staff is available to discuss the availability of current and upcoming truck technologies and incentive programs with the Lead Agency.
- Limit the daily number of trucks allowed at the Proposed Project to levels analyzed in the Final CEQA document. If higher daily truck volumes are anticipated to visit the site, the Lead Agency should commit to re-evaluating the Proposed Project through CEQA prior to allowing this higher activity level.
- Provide electric vehicle (EV) charging stations or, at a minimum, provide electrical infrastructure and electrical panels should be appropriately sized. Electrical hookups should be provided for truckers to plug in any onboard auxiliary equipment.

The Lead Agency is recommended to consider including mitigation measures specific to reducing or eliminating operational air quality impacts from other area sources, as follows:

[16] CARB adopted the statewide Truck and Bus Regulation in 2010. The Regulation requires diesel trucks and buses that operate in California to be upgraded to reduce emissions. Newer heavier trucks and buses must meet particulate matter filter requirements beginning January 1, 2012. Lighter and older heavier trucks must be replaced starting January 1, 2015. By January 1, 2023, nearly all trucks and buses will need to have 2010 model year engines or equivalent. More information on the CARB's Truck and Bus Regulation is available at: https://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm.

- Maximize use of solar energy by installing solar energy arrays.
- Use light colored paving and roofing materials.
- Utilize only Energy Star heating, cooling, and lighting devices, and appliances.
- Use of water-based or low VOC cleaning products that go beyond the requirements of South Coast AQMD Rule 1113.

To further reduce air quality and health risk impacts, the Lead Agency is recommended to incorporate the following design considerations in the Draft PEIR:

- Clearly mark truck routes with trailblazer signs, so that trucks will not travel next to or near sensitive land uses (e.g., residences, schools, day care centers, etc.).
- Design the Proposed Project such that truck entrances and exits are not facing sensitive receptors and trucks will not travel past sensitive land uses to enter or leave the Proposed Project site.
- Design the Proposed Project such that any check-in point for trucks is inside the Proposed Project site to ensure that there are no trucks queuing outside.
- Design the Proposed Project to ensure that truck traffic inside the Proposed Project site is as far away as feasible from sensitive receptors.
- Restrict overnight truck parking in sensitive land uses by providing overnight truck parking inside the Proposed Project site.

On May 7, 2021, South Coast AQMD's Governing Board adopted Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program, and Rule 316 – Fees for Rule 2305. Rules 2305 and 316 are new rules that will reduce regional and local emissions of nitrogen oxides (NOx) and particulate matter (PM), including DPM. These emission reductions will reduce public health impacts from mobile sources that are associated with warehouse activities on communities located near warehouses. Also, the emission reductions will help the region attain federal and state ambient air quality standards. Rule 2305 applies to owners and operators of warehouses greater than or equal to 100,000 square feet. Under Rule 2305, operators are subject to an annual WAIRE Points Compliance Obligation that is calculated based on the annual number of truck trips to the warehouse. WAIRE Points can be earned by implementing actions in a prescribed menu in Rule 2305, implementing a site-specific custom plan, or paying a mitigation fee. Warehouse owners are only required to submit limited information reports, but they can opt in to earn WAIRE Points on behalf of their tenants if they choose because certain actions to reduce emissions may be better achieved at the warehouse development phase (e.g., the installation of solar and charging infrastructure). Rule 316, the companion fee rule to Rule 2305, which allows the South Coast AQMD to recover costs associated with Rule 2305 compliance activities. Since the Proposed Project is a program-level planning document that may facilitate future warehouse and other truck-intensive land uses that could be subject to Rule 2305, the Lead Agency is recommended to evaluate whether the Draft PEIR can incorporate planning-level policies, development standards, infrastructure considerations, and/or mitigation measures that may support future compliance with Rule 2305 and reduce emissions from warehouse-related operations. In addition, the Lead Agency is recommended to review South Coast AQMD Rule

2305 to determine the potential WAIRE Points Compliance Obligation for future operators and explore whether additional project requirements and CEQA mitigation measures can be identified and implemented to help future warehouse operators meet their compliance obligation.[17] South Coast AQMD staff is available to answer questions concerning Rule 2305 implementation and compliance by phone or email at (909) 396-3140 or waire-program@aqmd.gov. For more information on implementation guidance and the available compliance and reporting tools, please visit South Coast AQMD's WAIRE Program webpage.[18]

South Coast AQMD staff is available to work with the Lead Agency to ensure that air quality, greenhouse gas, and health risk impacts from the Proposed Project are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact Jivar Afshar, Air Quality Specialist, at jafshar@aqmd.gov.

Sincerely,

Sam Wang

Sam Wang
Program Supervisor, CEQA IGR
Planning, Rule Development & Implementation

BR:SW:JA
RVC260310-02
Control Number

[17] South Coast AQMD Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program. Accessed at: http://www.aqmd.gov/docs/default-source/rule-book/reg-xxiii/r2305.pdf.
[18] South Coast AQMD WAIRE Program. Accessed at: http://www.aqmd.gov/waire.

From: Hildebrand, John <JHildebr@RIVCO.ORG>
Sent: Monday, March 2, 2026 7:13 AM
To: Moore, Sarah <SarMoore@Rivco.org>; Bruckner, Scott <SBruckner@rivco.org>
Subject: FW: Cabazon Community Plan

Forwarding

From: Bill Havert <havertbill538@gmail.com>
Sent: Monday, March 2, 2026 12:07 AM
To: Hildebrand, John <JHildebr@RIVCO.ORG>; Moore, Sarah <SarMoore@Rivco.org>; Bruckner, Scott <SBruckner@rivco.org>
Cc: Richard Marshalian <rmarshalian@rivco.org>; Leffew, Jordan <JLeffew@Rivco.org>; joan taylor <palmcanyon@mac.com>; Katie Barrows <kate.cnb@verizon.net>
Subject: Re: Cabazon Community Plan

John, thanks for the update and I, Joan, and Katie would appreciate being informed when the next community meetings are scheduled and if revised documents become available. Also, we would like to encourage the County to consult with CVCC on the project and get a Joint Project Review (JPR). We recognize the challenge in undertaking a

JPR when no specific development footprint is being submitted. We think, however, it is feasible for CVCC to conduct a JPR by assuming development consistent with the land use designations proposed on the Cabazon Community Plan Land Use Map to evaluate if such development would be consistent with the Cabazon Conservation Area's Conservation Goals and Objectives. The JPR would be evaluating a full buildout scenario, and because it would be evaluating a theoretical development scenario rather than an actually proposed one, its findings would be informative but informal as they would not be for a specific development proposal. The JPR would, however, provide the County with useful information as the County continues its planning process. It also addresses what we feel is an overarching question as to how effectively the CVMSHCP can be implemented if a JPR type analysis does not occur to assess the potential of the proposed Land Use Map to impact the Cabazon Conservation Area's Conservation Goals and Objectives prior to adoption.

We think there are several important benefits from obtaining a JPR. These are:

1. A JPR would provide information about potential conflicts with the Cabazon Conservation Area's Conservation Goals and Objectives which could help ensure that the County did not inadvertently create landowner/developer expectations about development that might turn out to be inconsistent with the CVMSHCP when specific projects were submitted to CVCC for JPRs.
2. A JPR would be helpful with the programmatic EIR as it would provide information and potentially documentation for the EIR's analysis of critical issues including Essential Ecological Processes and Biological Corridors. An EIR without the benefit of CVCC's analysis would have a more challenging task to assess how the Community Plan might impact the Cabazon Conservation Area's Conservation Goals and Objectives, and an EIR without this analysis would risk being deficient.
3. A JPR would demonstrate the County's desire to balance environmental protection issues with development needs and its sensitivity to the input from conservation groups who have expressed a strong interest in this planning effort and have already raised significant concerns.

In our view, good planning by the County and effective implementation of the CVMSHCP by the CVCC support a JPR's being prepared for the Cabazon Community Plan Land Use Map.

Sincerely,

Bill

From: Hildebrand, John <JHildebr@RIVCO.ORG>
Sent: Saturday, February 28, 2026 2:29 AM

To: Bill Havert <havertbill538@gmail.com>; Moore, Sarah <SarMoore@Rivco.org>; Bruckner, Scott <SBruckner@rivco.org>
Cc: Richard Marshalian <rmarshalian@rivco.org>; Leffew, Jordan <JLeffew@Rivco.org>; joan taylor <palmcanyon@mac.com>; Katie Barrows <kate.cnb@verizon.net>
Subject: RE: Cabazon Community Plan

Bill – the plan is ongoing and we will be conducting additional community meetings within the next few months. There is a programmatic EIR accompanying the community plan. This community plan doesn't result in anything physically being constructed, but sets forth policies and opportunities for future development, all of which would still be subject to their own / individual environmental analysis. When the next set of community meetings are scheduled we will let you know, if you'd like to participate.

Regards,

John Hildebrand

From: Bill Havert <havertbill538@gmail.com>
Sent: Thursday, February 26, 2026 9:23 PM
To: Hildebrand, John <JHildebr@RIVCO.ORG>
Cc: Richard Marshalian <rmarshalian@rivco.org>; Leffew, Jordan <JLeffew@Rivco.org>; joan taylor <palmcanyon@mac.com>; Katie Barrows <kate.cnb@verizon.net>
Subject: Cabazon Community Plan

Hello, John,

I hope all is well. Can you give us an update on the status of the Cabazon Community Plan? There were workshops last fall and we submitted comments, but we haven't seen any indication of recent activity on the plan. In addition to a status report, we would appreciate understanding what the County's thoughts are at this point about CEQA compliance and about how to assess if the land uses proposed on the Community Plan Land Use Map are consistent with the CVMSHCP's Cabazon Conservation Area Conservation Goals and Objectives.

Thanks,

Bill Havert

Confidentiality Disclaimer

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

County of Riverside California

June 23, 2026

Via email: CabazonPlan@rivco.org

Candice Hughes
County of Riverside
4080 Lemon Street, 12th Flr.
P.O. Box 1409
Riverside CA 92502

Re: Additional Comments Regarding Issues to be Addressed in the Program EIR for Cabazon Community Plan (CCP) Project and Cabazon Infrastructure Plan (CIP) GPA

Dear Ms. Hughes:

Although the NOP comment period for the Cabazon Community Plan (GPA 01206) has closed, CEQA imposes no jurisdictional bar on the submission or consideration of scoping comments after that deadline. CEQA requires environmental review to occur at the "earliest feasible time" (Guidelines §15004) and obligates Riverside County, as lead agency, to consider all substantial evidence received prior to project approval. Courts have repeatedly held that agencies must evaluate relevant information submitted at any point before EIR certification, even if outside a designated comment window. See *Citizens for Responsible Equitable Environmental Development v. City of San Diego* (2011) 196 Cal.App.4th 515, 528 (agency must consider all evidence in the record prior to approval); *Vineyard Area Citizens for Responsible Growth v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 442 (EIR must be revised or supplemented when new information renders analysis inadequate); *Save Our Peninsula Committee v. Monterey County Bd. of Supervisors* (2001) 87 Cal.App.4th 99, 118–119 (agency must meaningfully address relevant environmental concerns raised before

project approval). Because the Draft EIR for GPA 01206 has not yet been released and the project description continues to evolve, these comments are timely, appropriate, and legally required to be considered to ensure the DEIR is adequate, complete, and consistent with CEQA's informational mandate.

When the NOP was released, it contained no or few specifics about the proposed Cabazon Community Plan/Cabazon Infrastructure Plan, which made it challenging to identify issues that would need to be addressed in the EIR. Nor did the NOP contain adequate explanation of the proposed GPA's relationship to the provisions of the Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP) or the Western Riverside Multiple Species Habitat Conservation Plan (WRMSHCP). Despite considerable effort on our part to obtain more background information and understand and identify all the potential effects the project could have on the environment and critical plans such as the CVMSHCP and the WRMSHCP, the 30-day response period to the NOP was insufficient to enable us to identify all the important issues. We are, therefore, now providing additional scoping comments which must be addressed in the EIR. Before presenting those scoping comments, however, we must first raise the threshold issue that the County actually needs to issue a new legally adequate CEQA-compliant NOP before preparing or releasing a DEIR.

New NOP required

The NOP released in March 2026 failed to provide an accurate, stable, and finite description of the project, and therefore did not allow responsible agencies or the public to identify the full range of environmental issues requiring analysis in the EIR. CEQA Guidelines §15082 requires that an NOP contain sufficient information to permit meaningful scoping; here, the NOP omitted or mischaracterized key elements of the project, including the inconsistency with the CVMSHCP and the County's obligations as a Permittee; the relevance of the WRMSHCP; the extent of infrastructure-induced growth; the project's relationship to other projects such as the Cabazon EIFD's Infrastructure Financing Plan; and foreseeable impacts to the San Bernardino–San Jacinto wildlife linkage and the CESA-listed mountain lion. This inadequate project description in the NOP invalidates the forthcoming DEIR because it prevents meaningful public participation and undermines CEQA's informational purpose.

The County should withdraw the original NOP and issue a new one which meets CEQA requirements prior to continuing preparation and release of the DEIR. Per Cal. Code Regs. Tit. 14, § 15082, "The notice of preparation shall provide the responsible and trustee agencies, the Office of Planning and Research and county clerk with sufficient information describing the project and the potential environmental effects to enable the responsible agencies to make a meaningful response. At a minimum, the information shall include:

a. Description of the project,
b. Location of the project (either by street address and cross street, for a project in an urbanized area, or by attaching a specific map, preferably a copy of a U.S.G.S. 15' or 7 1/2' topographical map identified by quadrangle name), and
c. Probable environmental effects of the project."

The original NOP failed, among the other things noted above, to identify the project's relationship to the CVMSHCP and WRMSHCP and its inconsistencies with those plans. In the case of the CVMSHCP, that inconsistency would blatantly cause the County to be in violation of its obligations as a Permittee and signatory to the CVMSHCP Implementing Agreement. Failure to disclose this overwhelmingly relevant and essential issue and environmental effect is, by itself, compelling reason why the County must issue a new NOP before proceeding with and releasing a DEIR.

Additional Scoping Comments

Our additional comments to be addressed in the eventual EIR are:

1. **Relationship of the GPA with other existing plans**. The project description in the EIR must comprehensively explain the relationship between the proposed GPA and the Infrastructure Financing Plan (IFP) adopted last October by the Public Finance Authority of the Cabazon Enhanced Infrastructure Financing District. In particular, the EIR project description should explain if the IFP is consistent or inconsistent with the existing General Plan land use designations in the Cabazon Conservation Area, and elsewhere in the CCP area; and if, in fact, the County's GPA proposes new land use designations in the Cabazon area in part in order to make the IFP consistent with the County General Plan, which it currently is not, but which it must be per Section 53398.63 of the California Government Code.

2. **Consistency with the CVMSHCP and WRMSHCP**. It is clear that the proposed GPA is inconsistent with the requirements of the CVMSHCP, including the conservation of identified fluvial sand transport process areas and the maintenance of functional biological corridors. Approval of the GPA by the County will place the County out of compliance with the CVMSHCP and the County's obligations as a Permittee. This would logically lead to suspension or revocation of the CVMSHCP Take Permits in whole or in part. As a matter of law and equity, the County cannot abrogate its obligations as a Permittee; therefore, the County clearly needs to ensure consistency with the CVMSHCP.

A portion of the project area is within the WR-MSHCP. The EIR also needs to ensure that the preferred alternative is consistent with the requirements of that plan, especially as regards the special linkage between the San Bernardino Mountains and the San Jacinto Mountains. The EIR should also discuss the results and current status of the CVMSHCP requirement that, "Within one year of Permit issuance, CVCC and the applicable Local Permittee will coordinate with the Western Riverside County MSHCP Regional Conservation Authority to ensure that fluvial sand transport along the San Gorgonio River west of the Cabazon Conservation Area and functionality of the San Gorgonio River as a Biological Corridor are maintained." (CVMSHCP Section 4.3.1, Required Measure #5)

Importantly, as detailed in our April 8, 2026 letter, the County has not justified its stated need to place 25,000 housing units and the population that would support in the Cabazon area. The EIR must explain the basis of the 25,000-unit projection, particularly because that number exceeds the SCAG indication for the area's growth by approximately 1,650%. It is also notable that the 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy of the Southern California Association of Governments growth forecast for all of unincorporated Riverside County was an increase of 42,400 households between 2019 and 2050. It strains credibility that it is appropriate to foist the majority of the state's Regional Housing Needs Assessment for the entire County on this one rural community that lacks services, jobs and infrastructure. The County may not use this bloated and inappropriately sited population target, to justify dismissing a legitimate project alternative.

3. **Project Alternatives.** As required by CEQA, an EIR must evaluate a range of alternatives that could feasibly achieve most of the project's basic objectives and would avoid or substantially lessen one or more significant environmental impacts. The alternatives analysis must emphasize options that would avoid or substantially lessen the project's significant effects, even if they impede attainment of some project objectives, or are more costly. Among those the EIR must include are:

   - *No Project Alternative*. The No Project alternative includes existing conditions at the time of the NOP, and would reasonably reflect the foreseeable future if the project were not approved. Clearly, existing conditions include the land use designations in the Cabazon Conservation Area in effect at the time the CVMSHCP was approved (and which are currently in effect), and on which the CVMSHCP specifically relies to achieve the required Conservation Objectives for the Cabazon Conservation Area. If the No Project Alternative is environmentally superior, the EIR must identify another environmentally superior alternative among the remaining options per CEQA Guidelines §15126.6(e)(2).

- *Project Alternative consistent with the CVMSHCP and WRMSHCP.* For the project as proposed, the proposed land use designations in the GPA are inconsistent with the CVMSHCP, such that the EIR must consider a Project Alternative that is by design specifically consistent with the CVMSHCP Cabazon Conservation Area Conservation Objectives and Required Measures and requires no amendment to the CVMSHCP, including no channelization of the San Gorgonio River and its tributaries. Equivalently, this Alternative must by design be consistent with the WRMSHCP. This is necessary to ensure the GPA does not violate the terms of the Permit and IA. Note that outside of the actual Conservation Area, the County may propose changes to land use designations and General Plan policies so long as those do not indirectly impede the attainment of the Conservation Objectives and Required Measures in the Cabazon Conservation Area. Thus, this is distinct from a No Project Alternative.

- *Project Alternative with a Minor Amendment Requiring Wildlife Agency Concurrence.* The County cannot approve a GPA that is clearly inconsistent with the CVMSHCP and does not meet the County's obligations as a Permittee. The CCP/CIP GPA includes flood control structures along some or all of the San Gorgonio River and at least portions of the Millard Canyon channel. Approval of a GPA that includes and relies on such flood control activities would render the GPA inconsistent with the CVMSHCP, which is not permissible. Therefore, the proposed GPA can only be approved concurrently with the CVMSHCP required Minor Amendment with Wildlife Agency concurrence to address flood control structures impacting the San Gorgonio River and its tributaries. (See especially CVMSHCP Section 4.3.1, Conservation Objective 5: "Maintain the current capacity for fluvial (water-borne) sand transport along 4,496 acres of the San Gorgonio River and its tributaries.") The proposed terms of the necessary Minor Amendment proposal need to be part of the project description and detailed in the alternatives analysis. This requires specific descriptions of the proposed flood control activities in the EIR and analysis of their impacts to fluvial sand transport. This, in turn, would require a significant hydrology study and a detailed analysis of what the effect of the proposed channelization would likely be on Covered Species and natural communities in the Snow Creek/Windy Point and Whitewater Floodplain Conservation Areas dependent on fluvial sand transport from the San Gorgonio River and its tributaries. To determine what is an adequate hydrology study and any other studies that may be required to achieve an adequate analysis, the County should consult with CDFW and USFWS since their concurrence with the Minor Amendment is required. This alternative should also assess and discuss whether a minor (or major) amendment could be needed to ensure compliance with the WRMSHCP.

- *Project Alternative with a Major Amendment to the CVMSHCP.* Because the GPA as proposed is clearly inconsistent with the CVMSHCP and the County's obligations as a Permitee, if no project alternative can be identified that would be consistent with the CVMSHCP, a Major Amendment to the CVMSHCP to address the inconsistency issues would be required. The alternatives analysis would need to detail what such a Major Amendment would consist of to ensure the County did not violate its obligations as a Permittee and IA signatory, and assess potential impacts associated with a Major Amendment. The same is true for the GPA's relationship to the WRMSHCP, especially as regards the special linkage between the San Bernardino Mountains and the San Jacinto Mountains.

4. **Adequate mitigation**. As previously described, the GPA is inconsistent with the CVMSHCP. If project modifications cannot make it consistent, feasible and adequate mitigation measures would have to be included in an effort to make it consistent. Public Resources Code §§21002 and 21081, together with CEQA Guidelines §15126.4(a)(1), establish a mandatory mitigation hierarchy that requires agencies to adopt all feasible measures that first avoid, then minimize, then rectify, then reduce over time, and only lastly compensate for significant environmental impacts. To be feasible, mitigation measures must clearly be financially achievable. One possible funding source that should be considered is the IFP approved by the Public Financing Authority of the Cabazon EIFD in October 2025. The IFP could certainly be modified to include funding for open space acquisition, wildlife underpasses, movement barriers, and fencing, as such uses are fully supported by state law governing IFPs.

5. **Mountain lion (*puma concolor*) issues**. In February 2026, six populations of mountain lion were listed as a threatened Distinct Population Segment under the California Endangered Species Act (CESA). Two of them, the Eastern Peninsular and the San Gabriel-San Bernardino Mountains populations, utilize the San Bernardino-San Jacinto habitat linkage which connects the San Bernardino and San Jacinto Mountains (SB-SJ Mountains). It is a linkage of regional and statewide significance. Its protection is critical to the movement of mountain lions and potentially other rare species. The SB-SJ Mountains have become increasingly isolated from each other due to the I-10 freeway and development. As a result, the habitat linkages between them have become less permeable to wildlife movement including mountain lions. In recognition of this, the California Department of Fish and Wildlife has designated it a priority barrier to wildlife movement. The CCP area is a critical connectivity bottleneck, and the proposed project would further impact it. The potentially significant effects to the mountain lion populations and other species constitute a mandatory finding of significance under

CEQA. The EIR must assess and address this significant effect and one or more project alternatives must be developed which avoid these impacts including but not limited to a project alternative which specifically incorporates appropriately large-scale wildlife crossing infrastructure (e.g. a wildlife overpass) in order to directly reduce the severity of negative impacts on wildlife movement and habitat connectivity posed by the project. Additionally, projects that may impede movement, degrade habitat, or increase mortality risk to the listed mountain lions may require a CESA Incidental Take Permit (ITP). Further, projects that would ultimately involve state or federal agencies, such as Caltrans and/or Federal Highways Administration, may require CDFW consultation and, potentially NEPA review and USFWS consultation. The EIR should address all these potentials, identify project impacts, and necessary avoidance, minimization, and mitigation measures, and identify additional permits required. Among the potential impacts that need to be identified and addressed are increased fragmentation in the San Bernardino–San Jacinto linkage, increased vehicle strike risk, increased edge effects, including light, noise, and human-wildlife conflict, the increased likelihood of unpermitted CESA take, and the potential that the proposed GPA results in the likelihood that future landowner-initiated amendments or individual project proposals will require a CESA Incidental Take Permit.

6. **Cumulative Impacts Analysis.** As stated above, the Cabazon area lies within the San Bernardino–San Jacinto wildlife linkage, a regionally important corridor connecting the San Bernardino and San Jacinto Mountains, and the proposal has the potential to further reduce connectivity, and otherwise impact mountain lions and other rare species including unpermitted take of mountain lions. Because the CCP area is part of a larger wildlife linkage area between the San Bernardino Mountains and the San Jacinto Mountains, it is imperative that the DEIR include a cumulative impacts analysis the scope of which is the entire San Gorgonio Pass area. This includes relevant plans and activities that could be undertaken by San Bernardino County, the cities of Calimesa, Beaumont, and Banning, and the Morongo Band of Cahuilla Indians.

   Further, CEQA requires that the best available information, including studies, be used to evaluate the potentially significant effects of projects. A wildlife connectivity study along the I-10 corridor in the vicinity of the project commissioned by the Coachella Valley Conservation Commission is anticipated to be released this month. We ask that you include this information in the analysis of direct and indirect effects of the project to wildlife connectivity.

Please ensure that these issues are adequately addressed in the EIR, noting the County's initial obligation to circulate a revised NOP.

Sincerely,

Joan Taylor
Chair, Tahquitz Group
Sierra Club San Gorgonio Chapter

Kristeen Penrod
Director
SC Wildlands

Seth Alston
Associate Attorney Urban Wildland Program
Center for Biological Diversity

Bettina Rosmarino
Land Acquisition Director
Oswit Land Trust

Jack Thompson
Regional Director
The Wildlands Conservancy

Dan Silver
Executive Director
Endangered Habitats League

Christina Aiello, PhD
California Wildlife Biologist
Wildlands Network

Cc: Karin Cleary Rose, USFWS, Supervisory Wildlife Biologist
Mary Beth Woulfe, USFWS, Section 6 Coordinator, Palm Springs/Carlsbad
Heather Brashear, CDFW, Senior Environmental Scientist
Kim Freeburn, CDFW, Environmental Program Manager
Jacob Skaggs, CDFW, Inland Deserts Region
Tom Kirk, Executive Director, Coachella Valley Conservation Commission,
Aaron Gabbe, Director, Western Riverside County Regional Conservation Authority/Riverside County Transportation Commission

From:	SoCalGasTransmissionUtilityRequest
To:	TLMA Cabazon Plan
Subject:	DCF: 0611-26-2000 5000(3) / CABAZON INFRASTRUCTURE PLAN AND CABAZON COMMUNITY PLAN PROJECT (GPA NO. 01206 AND ZR6234)
Date:	Wednesday, April 8, 2026 1:39:00 PM
Attachments:	0611-26-2000 5000(3) MAP.pdf 0611-26-2000 5000(3) GEN REQ.pdf 0611-26-2000 5000(3) MAP REQUEST.pdf

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

Good afternoon,

Attached is a letter from the Transmission Department of SoCalGas stating that we have high pressure gas transmission facilities within your proposed project vicinity. Included is a map of the conflict area and our general requirements when performing work or planning projects near SoCalGas high pressure lines. Please note, dimensioning is not provided, and we do not share as-built maps.

If additional assistance is required, please send a copy of the project plans for an engineer to review and advise.

Please reference the Document Control File number (DCF) on all future correspondence in regards to this project.

Thank you,
Nerses Papazyan
Pipeline Planning Assistant
Gas Transmission Technical Services

SoCalGas
A Sempra Energy utility

PLEASE VISIT OUR INTERACTIVE WEBSITE TO VIEW OUR HIGH PRESSURE DISTRIBUTION AND TRANSMISSION LINES: SOCALGAS - NATURAL GAS PIPELINE MAP.

TO HELP THE ENVIRONMENT AND TO EXPEDITE RESPONSES, PLEASE SEND FUTURE PROJECTS AND CORRESPONDING ATTACHMENTS VIA EMAIL: SoCalGasTransmissionUtilityRequest@semprautilities.com

Please allow up to 60 days to receive a response to all future utility requests

NOTICE: This message is covered by the Electronic Communications Privacy Act, Title 18, United States Code, Sections 2510-2521.

This e-mail and any attached files are the exclusive property of Sempra Energy and the sender, are deemed privileged and confidential, and are intended solely for the use of the individual(s) or entity to whom this e-mail is addressed. If you are not one of the named recipient(s) or believe that you have received this message in error, please delete this e-mail and any attachments and notify the sender immediately. Any other use, re-creation, dissemination, forwarding or copying of this e-mail is strictly prohibited and may be unlawful.

From: SCG SE Region Redlands Utility Request <SCGSERegionRedlandsUtilityRequest@semprautilities.com>
Sent: Thursday, March 12, 2026 1:36 PM
To: CabazonPlan@rivco.org
Cc: SCG SE Region Redlands Utility Request <SCGSERegionRedlandsUtilityRequest@semprautilities.com>; SoCalGasTransmissionUtilityRequest <SoCalGasTransmissionUtilityRequest@semprautilities.com>
Subject: 3/12/26- CABAZON INFRASTRUCTURE PLAN AND CABAZON COMMUNITY PLAN PROJECT (GPA NO. 01206 AND ZR6234)

This is a SoCalGas Distribution response. I am including SoCalGas Transmission SoCalGasTransmissionUtilityRequest@semprautilities.com **as they may have facilities in the area.**

Hello,

Regarding: CABAZON INFRASTRUCTURE PLAN AND CABAZON COMMUNITY PLAN PROJECT (GPA NO. 01206 AND ZR6234)

SoCalGas Distribution does have facilities in the loacted througout the highlighted project area. Please include a note to have the developer contact 811 / USA at DigAlert | Utility Locating California | Underground Wire & Cable Locator prior to any excavation / demolition activities so we can Locate & Mark out our facilities. **Any excavation activity within ten (10) feet of our High-Pressure facilities will require a SoCalGas employee standby.**

If the Developer needs new gas service, please have them contact our Builder Services group to begin the application process as soon as practicable, at https://www.socalgas.com/for-your-business/builder-services.

If Atlas Maps or a Will Serve letter are required, a request can be submitted to: SCGSERegionRedlandsUtilityRequest@semprautilities.com

Please attach a Google Maps satellite image of the requested area, with the exact project boundaries clearly outlined in red, provided in either PDF or JPEG format. Please note that we are unable to access external SharePoint links or zip files. It is essential that our mapping team can zoom in on the image to accurately verify cross streets. Additionally, please include the following information, if available:

- **Project address**
- **APN for the land parcel**
- **Cross streets**

- **City**
- **Zip code**
- **Company name**
- **Company address**
- **Contact person's full name**
- **Phone number**
- **Email address**

For will serve letter requests please ALSO include the following: company, entity, or person that the letter will be made out to with address, city, state, and zip code.

Please note the following:

- **Will Serve & Map requests may take up to 30 business days to receive an invoice. The fees are $13.50 per map and $45 per Will Serve letter.**
- **Once payment is received, processed, and cleared, it may take up to 10 business days to receive the documents.**
- **Expedited services are not available.**
- **Payments must be made prior to receiving documents, with no exceptions. All payments are final and non-refundable.**
- **According to CPUC Tariff Rule 34 and County/Municipal Franchise Agreements, a no-cost "City Request" must be sent from the City/Agency. Third-party contractors will be charged.**

To avoid delays in processing requests and notifications, please have all Franchise correspondence sent to our Utility Request inbox.

Utility Request Contact Information by Region

Southeast Region – Redlands

For requests in the southeastern areas of Los Angeles County, Riverside County, San Bernardino County, and Imperial County, please contact:

SCGSERegionRedlandsUtilityRequest@semprautilities.com

Southeast Region – Anaheim

For all of Orange County and the southern portions of Los Angeles County, please send Map and/or Will Serve Letter requests to:

AtlasRequests/WillServeAnaheim@semprautilities.com

Northwest Region – Compton HQ

For West and Central Los Angeles County, please direct Map Requests and Will Serve Letters to:

SCG-ComptonUtilityRequest@semprautilities.com

Northwest Region – Chatsworth

For requests from the northernmost parts of Los Angeles County extending up to Visalia, San Luis Obispo, Fresno, and Tulare, please contact:

NorthwestDistributionUtilityRequest@semprautilities.com

Transmission

For Transmission-related requests, please contact:
SoCalGasTransmissionUtilityRequest@semprautilities.com

New Business

For new gas service, please contact our Builder Services group to begin the application process:
https://www.socalgas.com/for-your-business/builder-services

Project Notification Requirements

Minor Street Improvement Projects

(Chip Seal, Slurry Seal, Grind & Overlay)

Please notify SoCalGas (SCG) a minimum of four (4) months prior to the start of pavement work to allow sufficient time to conduct required leak surveys and any necessary repairs.

Major Street Improvement Projects

Projects including, but not limited to:

- **Excavations greater than 9 inches**
- **Street widening**
- **Installation of new curbs and gutters**
- **Bus pads**
- **Traffic signals**
- **Street realignments**
- **Grade separations**

AND

Pipeline Projects

Including:

- **Storm drain**
- **Water and sewer lines**
- **Electrical**
- **Telecommunications**

Please provide signed and approved design plans showing all SCG facilities clearly identified:

- **4–6 months prior to construction for potential relocation of SCG medium-pressure facilities.**
- **9–12 months prior to construction for potential relocation of SCG high-pressure facilities.**

This time is required to review plans and design any necessary modifications to conflicting SCG facilities.

Coordination & Relocation Requests

Please keep SCG informed of:

- **Pre-construction meetings**
- **Construction schedules**
- **Project phasing updates**

This information allows SCG to coordinate and schedule any required work.

- **Potholing may be required to determine whether conflicts exist between proposed improvements and existing SCG facilities.**

If SCG facilities are in conflict and relocation is required, requests must be submitted in writing and include the following:

- **A signed "Notice to Owner" on official City, County, and/or company letterhead.**
- **Project name, number, and responsible title.**
- **Project address, location, anticipated start date, parameters, and full scope of work.**
- **A Thomas Guide page and/or Google Maps screenshot clearly highlighting the project area.**
- **Requestor company's contact name, title, phone number, email address, and any additional relevant information.**

Thank you,

Josh Rubal
Lead Planning Associate
Distribution Planning & Project Management
Redlands HQ - Southeast Region
(213) 231-7978 Office
SCGSERegionRedlandsUtilityRequest@semprautilities.com

SCG Transmission General Requirements

Transmission Technical
Services Department

9400 Oakdale Ave
Chatsworth, CA 91311
SC9314

April 8, 2026

Candice Hughes

Subject: **CABAZON INFRASTRUCTURE PLAN AND CABAZON COMMUNITY PLAN PROJECT (GPA NO. 01206 AND ZR6234)**

DCF: **0611-26-2000 5000(3)**

The following are general requirements provided when performing work or planning projects near SoCalGas high pressure lines. Please review requirements along with project plans and notify SoCalGas Transmission Department about any questions or conflicts.

It is highly recommended that communication is maintained with SoCalGas to address all conflicts. Depending on the specific scope of your project there may be less or more requirements that need to be discussed regarding your project.

1 - Consideration must be given to the safety of our pipeline(s) during all project stages.

2 - SoCalGas must have continuous and uninterrupted access to the pipeline(s) and easement(s). In addition, SoCalGas conducts routine patrols and surveys of the pipeline(s); SoCalGas needs drivable access along the pipeline(s)/easement(s).

3 - Buried pipelines must have a minimum cover of 3 feet and a maximum cover of 7 feet below finished grade. No change of grade whatsoever, even within these parameters, shall be made without prior approval of SoCalGas.

4 - Prior to SoCalGas approving encroachment onto its easement(s), SoCalGas must be furnished with final grading plans showing the depth of the pipeline(s) below the existing surface and the depth of the pipeline(s) below the proposed finished grade. These elevations must meet SoCalGas' requirements for buried pipelines.

5 - No permanent structures, such as buildings, block walls, foundations, gates, etc., shall be constructed within the easement or over the pipeline(s).

SCG Transmission General Requirements

6 - There shall be no planting of trees or other deep-rooted plants within the easement(s) or over the pipeline(s).

7 - Substructures shall cross perpendicular to the easement(s). Substructure crossings must provide a minimum of 18-inches vertical clearance from the pipeline(s). Additional separation is required for leach lines, fuel lines, etc.

8 - Parallel encroachments within the easement(s) are prohibited. In areas where a parallel substructure is being constructed outside of the easement(s), SoCalGas requires five feet of separation, with three feet of undisturbed fill, in order to protect the integrity of our facilities and allow the facilities to be safely accessed during inspection, maintenance, and repair. Additional separation may be needed for leach lines, fuel lines, high voltage electric, etc.

9 - All encroachments onto SoCalGas' easement(s) must have written approval of SoCalGas prior to construction or encroaching onto the easement(s).

10 - All work within the SoCalGas easement(s) and/or within 10 feet of the pipeline(s) must be witnessed by a SoCalGas representative, and no work will be allowed without the SoCalGas representative on site.

11 - No heavy equipment shall cross the pipeline(s) without SoCalGas' approval. Additional protective measures may be required where heavy equipment is expected to cross the pipeline(s).

12 - No mechanical equipment shall operate within three horizontal feet of the pipeline(s), and any closer work must be performed by hand.

13 - No mechanical equipment shall operate within two vertical feet of the pipeline(s), and any closer work must be performed by hand.

14 - Buried pipeline(s) shall not be left exposed, and exposed pipeline(s) shall not be buried, without prior inspection and approval by SoCalGas. If the pipeline(s) are exposed during construction (e.g. substructure crossings, etc.), the pipeline must be backfilled with sand or zero-sack slurry only.

15 - No vibratory compaction is permitted over the pipeline(s). In rare cases, vibratory compaction may be approved by SoCalGas' Engineering Department following review of detailed site conditions, pipeline data, and equipment specifications.

16 - All contractors and subcontractors must be notified of the presence of the pipeline(s).

17 - Contractors and subcontractors must call DigAlert (811) at least 2 working days prior to construction, grading, or excavation.

18 - Once approved, encroachments within SoCalGas' easement(s) shall be documented in an easement amendment or other document, as deemed appropriate by SoCalGas' Land Services Department.

In addition to the previous requirements, SoCalGas recommends the following:

19 - Potholes should be made, as necessary, to establish the horizontal and vertical alignment of the pipeline(s) within the project area. This information should be indicated on the plans, as needed. CAUTION: SoCalGas personnel must be present during potholing operations. Arrangements for SoCalGas personnel to stand by during potholing activities can be made by calling DigAlert at 811.

20 - Consideration should be given to building setbacks from the easement lines. A minimum 15-foot setback is recommended whenever possible.

21 - All potential buyers or tenants of the property should be made aware of the presence of the pipeline(s) and easement restrictions.

Best Regards,

SoCalGas Transmission Technical Services

Transmission Technical
Services Department

9400 Oakdale Ave
Chatsworth, CA 91311
SC9314

April 8, 2026

Candice Hughes

Subject: **CABAZON INFRASTRUCTURE PLAN AND CABAZON COMMUNITY PLAN PROJECT (GPA NO. 01206 AND ZR6234)**

DCF: **0611-26-2000 5000(3)**

Southern California Gas Company (SoCalGas) Transmission Department operates and maintains high-pressure natural gas transmission pipeline(s) in the vicinity of your project. The pipeline is shown on the attached map(s). Please note, only the high-pressure transmission pipeline information is current on these atlas prints.

Our Gas Distribution Department may have other gas facilities within your project area. To assure no conflict with the SoCalGas' distribution pipeline system, please contact

SCGSERegionRedlandsUtilityRequest@semprautilities.com.

This is only a response to a gas facility map request; a review of potential conflicts associated with your request has not been conducted. Consequently, **this letter does not constitute clearance for any construction work near or around SoCalGas' pipeline(s)**. As your project plans are developed, you must notify SoCalGas - Gas Transmission Department regarding the improvements that are proposed near our pipeline(s) and within our easement(s) before you begin any construction, including potholing. In doing so, please allow sufficient time as there may be certain requirements that need to be incorporated into your project's design and could significantly affect your project construction schedule.

Best Regards,
Nerses Papazyan
Pipeline Planning Assistant
SoCalGas Transmission Technical Services
SoCalGasTransmissionUtilityRequest@semprautilities.com

From:	SCG SE Region Redlands Utility Request
To:	TLMA Cabazon Plan
Cc:	SCG SE Region Redlands Utility Request; SoCalGasTransmissionUtilityRequest
Subject:	3/12/26- CABAZON INFRASTRUCTURE PLAN AND CABAZON COMMUNITY PLAN PROJECT (GPA NO. 01206 AND ZR6234)
Date:	Thursday, March 12, 2026 1:39:55 PM
Attachments:	20260312061153.pdf

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

This is a SoCalGas Distribution response. I am including SoCalGas Transmission SoCalGasTransmissionUtilityRequest@semprautilities.com as they may have facilities in the area.

Hello,

Regarding: CABAZON INFRASTRUCTURE PLAN AND CABAZON COMMUNITY PLAN PROJECT (GPA NO. 01206 AND ZR6234)

SoCalGas Distribution does have facilities in the loacted througout the highlighted project area. Please include a note to have the developer contact 811 / USA at DigAlert | Utility Locating California | Underground Wire & Cable Locator prior to any excavation / demolition activities so we can Locate & Mark out our facilities. **Any excavation activity within ten (10) feet of our High-Pressure facilities will require a SoCalGas employee standby.**

If the Developer needs new gas service, please have them contact our Builder Services group to begin the application process as soon as practicable, at https://www.socalgas.com/for-your-business/builder-services.

If Atlas Maps or a Will Serve letter are required, a request can be submitted to: SCGSERegionRedlandsUtilityRequest@semprautilities.com

Please attach a Google Maps satellite image of the requested area, with the exact project boundaries clearly outlined in red, provided in either PDF or JPEG format. Please note that we are unable to access external SharePoint links or zip files. It is essential that our mapping team can zoom in on the image to accurately verify cross streets. Additionally, please include the following information, if available:

- **Project address**
- **APN for the land parcel**
- **Cross streets**
- **City**
- **Zip code**
- **Company name**
- **Company address**
- **Contact person's full name**
- **Phone number**
- **Email address**

For will serve letter requests please ALSO include the following: company, entity, or

person that the letter will be made out to with address, city, state, and zip code. Please note the following:

- **Will Serve & Map requests may take up to 30 business days to receive an invoice. The fees are $13.50 per map and $45 per Will Serve letter.**
- **Once payment is received, processed, and cleared, it may take up to 10 business days to receive the documents.**
- **Expedited services are not available.**
- **Payments must be made prior to receiving documents, with no exceptions. All payments are final and non-refundable.**
- **According to CPUC Tariff Rule 34 and County/Municipal Franchise Agreements, a no-cost "City Request" must be sent from the City/Agency. Third-party contractors will be charged.**

To avoid delays in processing requests and notifications, please have all Franchise correspondence sent to our Utility Request inbox.

Utility Request Contact Information by Region

Southeast Region – Redlands

For requests in the southeastern areas of Los Angeles County, Riverside County, San Bernardino County, and Imperial County, please contact:
SCGSERegionRedlandsUtilityRequest@semprautilities.com

Southeast Region – Anaheim

For all of Orange County and the southern portions of Los Angeles County, please send Map and/or Will Serve Letter requests to:
AtlasRequests/WillServeAnaheim@semprautilities.com

Northwest Region – Compton HQ

For West and Central Los Angeles County, please direct Map Requests and Will Serve Letters to:
SCG-ComptonUtilityRequest@semprautilities.com

Northwest Region – Chatsworth

For requests from the northernmost parts of Los Angeles County extending up to Visalia, San Luis Obispo, Fresno, and Tulare, please contact:
NorthwestDistributionUtilityRequest@semprautilities.com

Transmission

For Transmission-related requests, please contact:
SoCalGasTransmissionUtilityRequest@semprautilities.com

New Business

For new gas service, please contact our Builder Services group to begin the application process:

https://www.socalgas.com/for-your-business/builder-services

Project Notification Requirements

Minor Street Improvement Projects

(Chip Seal, Slurry Seal, Grind & Overlay)

Please notify SoCalGas (SCG) a minimum of four (4) months prior to the start of pavement work to allow sufficient time to conduct required leak surveys and any necessary repairs.

Major Street Improvement Projects

Projects including, but not limited to:

- **Excavations greater than 9 inches**
- **Street widening**
- **Installation of new curbs and gutters**
- **Bus pads**
- **Traffic signals**
- **Street realignments**
- **Grade separations**

AND

Pipeline Projects

Including:

- **Storm drain**
- **Water and sewer lines**
- **Electrical**
- **Telecommunications**

Please provide signed and approved design plans showing all SCG facilities clearly identified:

- **4–6 months prior to construction for potential relocation of SCG medium-pressure facilities.**
- **9–12 months prior to construction for potential relocation of SCG high-pressure facilities.**

This time is required to review plans and design any necessary modifications to conflicting SCG facilities.

Coordination & Relocation Requests

Please keep SCG informed of:

- **Pre-construction meetings**
- **Construction schedules**
- **Project phasing updates**

This information allows SCG to coordinate and schedule any required work.

- **Potholing may be required to determine whether conflicts exist between proposed improvements and existing SCG facilities.**

If SCG facilities are in conflict and relocation is required, requests must be submitted in writing and include the following:

- **A signed "Notice to Owner" on official City, County, and/or company letterhead.**
- **Project name, number, and responsible title.**
- **Project address, location, anticipated start date, parameters, and full scope of work.**
- **A Thomas Guide page and/or Google Maps screenshot clearly highlighting the project area.**
- **Requestor company's contact name, title, phone number, email address, and any additional relevant information.**

Thank you,

Josh Rubal
Lead Planning Associate
Distribution Planning & Project Management
Redlands HQ - Southeast Region
(213) 231-7978 Office
SCGSERegionRedlandsUtilityRequest@semprautilities.com

From:	Tom Winkle
To:	TLMA Cabazon Plan
Cc:	Tom Winkle
Subject:	Cabazon Infrastructure Plan & Cabazon Community Plan Project CEQA Filing
Date:	Tuesday, March 17, 2026 9:06:11 AM

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

Hello Candice,

My team notified me of a recent CEQA filing associated with your organization and wanted to reach out directly in case our services could be of assistance.

For organizations responsible for environmental compliance and site management, efficiency and continuity are critical. Our company operates as a full-service environmental consultant and remediation contractor, providing both site assessment and remediation services under a single team.

Unlike firms that provide assessment and advisory services only, we both evaluate sites and carry out the remediation. This integrated approach reduces handoffs, limits re-scoping, and often results in tighter schedules and more controlled costs, particularly when coordinating with RWQCB, DTSC, or local oversight programs.

FREY Environmental supports Phase I and Phase II environmental site assessments, petroleum and non-petroleum remediation, and regulatory closure activities. We have supported sites across California for decades and have successfully closed thousands of cases statewide.

If you are already working with a consultant, we are also available to provide a second opinion or a comparative scope and cost review, which often identifies opportunities to streamline scope and reduce overall project cost.

A brief conversation would allow us to align on how FREY Environmental can support your current or ongoing environmental needs. Please feel free to share availability if it would be useful to connect.

Regards,

Tom

FREY Environmental, Inc.
2817 A Lafayette Avenue
Newport Beach, CA 92663

1336 Brommer Street, Ste. A-6
Santa Cruz, CA 95062

Cell: (949) 422-7935 (preferred)
TomWinkle@freyinc.com

From: Hughes, Candice
To: Trip Hord
Subject: RE: GPA01206 - P.C. Scoping Session / Cabazon Community Plan

---

Good Morning Trip,

It was nice speaking with you on Friday and again today. Currently, your parcels, 519100001, -2, -3 are not included in the Cabazon Community and Infrastructure Plan. To learn more about the plan, you can visit the link below and also listen in to the meeting.
The link below leads to the Planning Commission website. If you slightly scroll down the webpage, there is section which discusses Livestreaming Remote Participation "RivCoTV Live". Click on "RivCoTV Live".
https://planning.rctlma.org/planning-commission-meetings

Project Exhibits and Information
https://riversidecountyca.iqm2.com/Citizens/Detail_LegiFile.aspx?Frame=&MeetingID=3390&MediaPosition=&ID=29997&CssClass=

Please contact me if you have any questions. Thank you!

Candice Hughes
District 05 Principal Planner
Transportation and Land Management Agency - Planning
4080 Lemon Street 12th Floor
Riverside, CA 92501
951-955-1639

From: Trip Hord <ambrosehord@gmail.com>
Sent: Sunday, March 15, 2026 9:06 AM
To: Hughes, Candice <CHughes@Rivco.org>
Cc: Hildebrand, John <JHildebr@RIVCO.ORG>
Subject: GPA01206 - P.C. Scoping Session / Cabazon Community Plan

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

Candice:

Please present the following request and information to the Planning Commission at the EIR Scoping Session for the Cabazon Community Plan. This is a request to include 575 acres into the Community Plan Land Use and Infrastructure planning effort.

I plan to "attend" the meeting virtually.

Please call or write back with any questions regarding the parcels in question.

Thank you very much,

Trip Hord
(909) 553-5792

United States Department of the Interior
U.S. FISH AND WILDLIFE SERVICE
Ecological Services

Palm Springs
Fish and Wildlife Office
777 E. Tahquitz Canyon Way, Ste. 208
Palm Springs, California 92262

Southern Nevada
Fish and Wildlife Office
4701 North Torrey Pines Drive
Las Vegas, Nevada 89130-2301

In Reply Refer To:
2026-0073247-CEQA-NOP-ERV

April 8, 2026
Sent Electronically

Candice Hughes
District 5 Principal Planner
Riverside County Planning Department
4080 Lemon Street, 12th Floor
Riverside, California 92501

Subject: Notice of Preparation of a Draft Program Environmental Impact Report for the Cabazon Infrastructure Plan and Cabazon Community Plan Project, Riverside County, California

Dear Candice Hughes:

The U.S. Fish and Wildlife Service (Service) has reviewed the Notice of Preparation (NOP) of a Draft Program Environmental Impact Report (PEIR), received on March 4, 2026, for the Cabazon Infrastructure Plan and Cabazon Community Plan Project (Project), in the Community of Cabazon, Riverside County, California. The proposed Project would include implementation of the Cabazon Community Plan (CCP) and corresponding Cabazon Infrastructure Plan (CIP) in accordance with Riverside County's 6th Cycle Housing Element Action H-27. The plans are intended to address the Community of Cabazon's land use and infrastructure needs for anticipated future growth and development over the next 30 years. Additionally, the CCP proposes changes to the existing land use designations specified in the County of Riverside General Plan (General Plan).

We offer the following comments on the NOP as they relate to potential impacts on public trust resources. The primary concern and mandate of the Service is the protection of public fish and wildlife resources and their habitats. The Service has legal responsibility for the welfare of migratory birds, anadromous fish, and threatened and endangered animals and plants occurring in the United States. The Service is also responsible for administering the Federal Endangered Species Act of 1973 (Act), as amended (16 U.S.C. 1531 *et seq*.).

To facilitate the evaluation of the project relative to fish and wildlife resources, the draft PEIR should include detailed information on the number and distribution of federally listed species, candidate species, and the extent of sensitive and critical habitats that may be affected by the proposed Project alternatives, as well as aerial photographs, mapping, and tables to summarize such information. Focused species-specific surveys will need to be completed by qualified biologists and in accordance with the protocols accepted by the Service and California Department of Fish and Wildlife (CDFW), where necessary. Please ensure that

project information is collected and presented on a sufficient scale such that the entire project footprint is addressed, as well as areas that may be restored to offset these impacts.

COACHELLA VALLEY MULTIPLE SPECIES HABITAT CONSERVATION PLAN

The proposed Project is located within the boundary of the Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP), and the County of Riverside is a Permittee to the CVMSHCP. Portions of the proposed Project are located within the Cabazon Conservation Area and Santa Rosa and San Jacinto Mountains Conservation Area, and additionally, portions of the Project site are located within modeled habitat for the following Covered Species under the CVMSHCP:

- Peninsular bighorn sheep (*Ovis canadensis nelsoni*; federally endangered)
- Coachella Valley milk-vetch (*Astragalus lentiginosus var. coachellae*; federally endangered)
- Desert tortoise (*Gopherus agassizii*; federally threatened)
- Gray vireo (*Vireo vicinior*)
- Le Conte's thrasher (*Toxostoma lecontei*)
- Coachella Valley round-tailed ground squirrel (*Spermophilus tereticaudus chlorus*)
- Palm Springs pocket mouse (*Perognathus longimembris bangsi*)

Please include detailed information on the proposed Project's potential impacts to these Covered Species, including how the proposed Project will be consistent with the Conservation Objectives and Required Measures, Avoidance, Minimization, and Mitigation Measures, and Land Use Adjacency Guidelines identified in Sections 4.3, 4.4, and 4.5 of the CVMSHCP.

Additionally, the western burrowing owl (*Athene cunicularia hypugaea*; burrowing owl), a Covered Species under the CVMSHCP, Service Bird of Conservation Concern, and candidate species under the California Endangered Species Act, does not have modeled habitat under the CVMSHCP; however, burrowing owls have been observed in the vicinity of the proposed Project site, and the Project site contains suitable habitat. Please conduct focused burrowing owl surveys to determine the status of the species on the site. The surveys will need to be conducted consistent with the protocols described in CDFW's 2012 Staff Report on Burrowing Owl Mitigation, to accurately assess the proposed Project's impacts to burrowing owl and presence of burrowing owl within the Project area. Please include the results of focused burrowing owl surveys in the draft PEIR. The proposed Project site also may contain suitable habitat for nesting birds. Focused nesting bird surveys, both within and outside of nesting season, are necessary to accurately confirm nesting bird presence or absence. Please

include a complete assessment in the draft PEIR of nesting bird presence or absence within the proposed Project area and assess the proposed Project's potential impacts to nesting birds.

A significant portion of the proposed Project is located within a sand transport process area, which is identified in the CVMSHCP as an Essential Ecological Process area. Specifically, this area functions as an important fluvial sand transport system for the Snow Creek/Windy Point Conservation Area and the Whitewater Floodplain Conservation Area. Section 4.3.1 of the CVMSHCP includes a required measure for the Cabazon Conservation Area which states that the conservation of fluvial sand transport process areas "will be achieved through application of the general plan land use designations and policies." The Project proposes changes to the existing land uses within the Project area per the General Plan. As a Permittee to the CVMSHCP, the County of Riverside is required to ensure that changes to land use designations will not impact maintenance of fluvial sand transport processes and shall not alter or diminish their obligations under the CVMSHCP, Implementing Agreement (IA), or the Permits, as described in Section 20.2 of the IA. Additionally, a portion of the proposed Project site overlaps with the Fornat Wash Biological Corridor. Maintenance of biological corridors and linkages is necessary to ensure connectivity between Conservation Areas and to areas outside of the Plan Area. The CVMSHCP includes measures for the Cabazon Conservation Area pertaining to maintaining functional biological corridors. It is important that the draft PEIR includes a discussion regarding the proposed Project's potential impacts on Essential Ecological Processes, including sand transport areas and biological corridors and linkages, to ensure the proposed Project is consistent with the County of Riverside's obligations as a CVMSHCP Permittee.

WESTERN RIVERSIDE COUNTY MULTIPLE SPECIES HABITAT CONSERVATION PLAN

The Community Plan Project Area is within the Western Riverside County Multiple Species Habitat Conservation Plan (WR-MSHCP) Plan Area. Future infrastructure or capital improvement projects in the Community Plan Project Area would therefore be subject to the provisions and policies of the WR-MSHCP. In order for infrastructure or capital improvement projects in the Community Plan Project Area to be covered by the WR-MSHCP, Permittees must demonstrate that proposed actions are consistent with the WR-MSHCP and its permits and Implementing Agreement. The County of Riverside is a WR-MSHCP permittee and signed the permits and Implementing Agreement. Based on our review of the NOP, we recommend the PEIR address relevant WR-MSHCP policies and procedures including:

- Wildlife movement;
- Identification of how the buildout of the Community Plan Project Area will or will not affect completion of the Special Area Linkage and connectivity between the San Bernardino and San Jacinto Mountain ranges;
- Sand transport and potential downstream conservation area impacts, including fluvial and aeolian sand transport analyses;

- Protection of hydrological features, both Waters of the United States and Waters of the State, and WR-MSHCP Riparian/Riverine resources;

- Covered species specific policies and procedures including the Protection of Narrow Endemic Plant Species policy (WR-MSHCP Section 6.1.3) and the Additional Survey Needs and Procedures, which address burrowing owl (WR-MSHCP Section 6.3.2).

We appreciate the opportunity to provide comments on the NOP. If you have any questions regarding these comments, please contact Lory Salazar-Velasquez.[1] The Service is also available to meet with the County of Riverside staff to discuss our comments.

Sincerely,

for Brian Croft
Assistant Field Supervisor

[1] lory_salazar-velasquez@fws.gov.