

The County's Oak Tree Management Guidelines, approved on March 2, 1993 and revised in September 1999, provides guidance that maximizes preservation and minimizes impacts to oak trees through project design for private development. ~~These guidelines require that the project preserve the oak trees or a Heritage Tree Preservation and Protection Plan be in place during the grading and construction activities.~~

As outlined above in Response to Comment E-3, the proposed Project is preserving existing oak trees to the greatest extent feasible and the proposed Project has incorporated coast live oaks into the landscape plans for the site. Therefore, the proposed Project does not conflict with, but is in compliance with, the Elsinore Area Plan policy ELAP 15.1 and the Oak Tree Management Guidelines.

Response to Comment E-5:

A report titled "Temescal Canyon Road Oak Tree Maintenance Plan, County of Riverside" was prepared by Merkel & Associates, Inc. in 2008 for the Riverside County Transportation Department³. This report was prepared to provide the Riverside County Transportation Department with specific recommendations for the maintenance of oak (*Quercus* sp.) trees located along portions of Temescal Canyon Road [including along the Project site's frontage] and Ontario Avenue rights-of-way. Since road maintenance activities may severely affect oak trees, recommended corrective measures were also provided to assist the Transportation Department in meeting their goals while minimizing impacts to oak trees and ensuring compliance with existing Riverside County tree policies and guidance.

The following excerpt from the DEIR, Section 5.2.2.4 Local Regulations, page 5.0-44, -45 was taken from the Merkel & Associates, Inc. report:

5.2.2.4 Local Regulations

Riverside County Tree Policies, Plans, Ordinances, Guidance

Riverside County has an existing policy (County Policy 26) for tree removal on or adjacent to County road right-of-way (ROW) that was last revised in 1988. This policy is not exclusive to oak trees, it is applicable to all trees within or adjacent to the ROW. Under this policy, trees may be removed if the trees are determined to be dead or diseased or pose a danger to traffic or private property (County of Riverside 1986). Furthermore, trees may be considered for removal if they create an unsafe condition, such as obstructing the view for vehicles or conflict with construction work or major maintenance project, or if removal is required by an adjacent property owner. Pursuant to this policy, the removal of trees is subject to the approval of the District Maintenance Supervisor.

³ The *Temescal Canyon Road Oak Tree Maintenance Plan, County of Riverside* report prepared by Merkel & Associates, Inc., 2008 is available at the Riverside County Transportation Department.

The DEIR does not rely on “County Policy 26” to justify removal of oak trees. It was solely included in the DEIR in *Section 5.2.2.4 Local Regulations* as related information. However, there is no current “County Policy 26” in the Riverside County General Plan Chapter 5 Multipurpose Open Space Element, Chapter 4 Circulation Element, or the Elsinore Area Plan. As there is no current “County Policy 26” related to tree removal or oak trees, Section 5.2.2.4, page 5.0-44 and -45 of the DEIR will be corrected as shown below:

5.2.2.4 Local Regulations

~~Riverside County Tree Policies, Plans, Ordinances, Guidance~~

~~Riverside County has an existing policy (County Policy 26) for tree removal on or adjacent to County road right-of-way (ROW) that was last revised in 1988. This policy is not exclusive to oak trees, it is applicable to all trees within or adjacent to the ROW. Under this policy, trees may be removed if the trees are determined to be dead or diseased, or pose a danger to traffic or private property (County of Riverside 1986). Furthermore, trees may be considered for removal if they create an unsafe condition, such as obstructing the view for vehicles or conflict with construction work or major maintenance project, or if removal is required by an adjacent property owner. Pursuant to this policy, the removal of trees is subject to the approval of the District Maintenance Supervisor.~~

Response to Comment E-6:

As outlined above in Response to Comment E-3, the proposed Project is preserving existing oak trees to the greatest extent feasible and the proposed Project has incorporated coast live oaks into the landscape plans for the site. Therefore, the proposed Project does not conflict with, but is in compliance with, the Elsinore Area Plan policy ELAP 15.1 and the Oak Tree Management Guidelines.

Further, the DEIR included a thorough evaluation of potential impacts from the Project on sensitive natural communities identified in local or regional plans, policies, regulations or by CDFW or USFWS, which include oak woodlands. Per page 5.0-57 of the DEIR,

As outlined in Section 6.1.1 of the MSHCP (Volume 1, Section 6, page 6-3),

Payment of the mitigation fee and compliance with the requirements of Section 6.0 are intended to provide full mitigation under the California Environmental Quality Act (CEQA), National Environmental Policy Act (NEPA), Federal Endangered Species Act, and California Endangered Species Act for impacts to the species and habitats covered by the MSHCP pursuant to agreements with the US Fish and Wildlife Service, the California Department of Fish and Game [Wildlife] and/or any other appropriate participating regulatory agencies and as set forth in the Implementing Agreement for the MSHCP.

The Project is in compliance with Section 6.0 of the MSHCP as outlined above and as a condition of approval will be required to pay the mitigation fee prior to obtaining a grading permit. Therefore, with compliance with the MSHCP, payment of the MSHCP fee, and with implementation of mitigation measures **MM BIO 1** through **MM BIO 7**, potential impacts to threatened, endangered, or sensitive plant and wildlife species **are less than significant**.

Therefore, with compliance with the MSHCP, potential impacts from the Project on sensitive biological resources, including oak woodlands and individual oak trees, are less than significant.

Comment Letter F – Gamst, Caroline

Comment letter F commences on the next page.

Brady, Russell

From: Caroline Gamst <carolinegamst2@gmail.com>
Sent: Monday, July 09, 2018 11:47 AM
To: Brady, Russell
Subject: Re: DEIR released for proposed retail center

Oops Typo I am a Resident of Horsetheif Canyon*** thank you

F-1 On Mon, Jul 9, 2018 at 11:45 AM, Caroline Gamst <carolinegamst2@gmail.com> wrote:
Hello Russell,

I am a resident of Horsetail Canyon off of Indian Truck Trail in Corona CA. I want to say that I am SOOO excited and happy to hear of this proposed development of restaurants, grocery, gas stations etc etc. Please count this email as a vote for YES to build.

<http://www.wearetv.org/2017/07/13/plans-for-retail-center-announced/>

Thank you again!

Caroline Gamst
562-326-4805

Response to Comment Letter F – Gamst, Caroline

Response to Comment F-1:

Comment noted.

Comment Letter G – Hafner, Robert

Comment letter G commences on the next page.

Brady, Russell

From: Robert Hafner <safetyguy1@verizon.net>
Sent: Saturday, July 07, 2018 7:44 PM
To: Brady, Russell
Subject: DEIR for Shopping Center at Indian Truck Trail And Temescal Canyon Road

G-1 { With Toscano going in and other power lines heading that way I would suggest those be out underground. This can reduce fire risk along with improving esthetics. I also see three stop lights in that short of distance way way too restricting for traffic. I have lived out here 15+ years. Please don't do that and create bottle neck on our only option for north south other than the I-15. I can give you several example where the same set up was done and all it causes is nightmarish traffic. Please bury lines and reduce number of Stop lights.

Sent from my iPhone

Response to Comment Letter G – Hafner, Robert

Response to Comment G-1:

Approximately eight (8) existing Southern California Edison (SCE) power poles that are located along Temescal Canyon Road and the project site's frontage will need to be relocated. The power poles will generally remain in the same location within the existing SCE Right-of-Way. The relocation is an adjustment in elevation because the existing elevation (or ground level) where they are located and the proposed elevation after site grading and proposed improvements to the west side of Temescal Canyon Road are different. The elevation adjustments are anticipated to be completed by installing a new pole several feet away from the existing at the new elevation and then transferring the power lines from the previous pole to the new pole at the proper elevation (DEIR, p. 3.0-4).

The existing SCE power poles support several lines including SCE high voltage 115 kV (kilovolt) transmission lines (upper lines), 12 kV distribution lines (middle lines), and communication lines (lower lines) that go to the Ivyglen Substation located approximately 1 mile northwest of the Project site along Temescal Canyon Road on the west side of I-15. According to the SCE *Power Bulletin* Volume 13 No. 4 May 2013 (https://www.sce.com/wps/wcm/connect/4a5ed5e3-b0e8-48cf-b7c3-8ba5000188a6/1304_PowerBulletin.pdf?MOD=AJPERES), "With safety, reliability, and affordability in mind, undergrounding transmission lines can cost up to 50 times more than an equivalent overhead line." "Virtually all 230 kV and above high-voltage electrical transmission lines constructed are proposed as overhead infrastructure for three general reasons: cost, reliability, and environmental considerations." "SCE's preference for placing high voltage transmission lines on overhead structures is rooted in our responsibility to safely provide customers with the most affordable, reliable power possible. Underground construction has occurred nationally for lower voltage lines that power homes and businesses, typically, lines 33 kV and below. In rare instances, short portions of 115 kV, 230 kV, and 345 kV lines have been constructed underground."

Riverside County zoning regulations indicate utilities shall be installed underground except that electrical lines rated at 33 kV or greater may be installed above ground. The proposed Project does not require installation of new electrical lines as it will connect to the existing SCE lines. As SCE's existing poles support high voltage transmission lines (115 kV) they are not intended to be underground. Only elevation adjustments to approximately eight (8) existing SCE high voltage transmission lines will be made along the Project's frontage with Temescal Canyon Road as required the Project's grading activities.

Regarding the traffic signal comment, the Project's design provides stop sign control at all four Project Driveways until signal warrants are met (DEIR, p. 5.0-185). Only three new traffic signals are proposed at Project buildout (Phase II) in order to attain acceptable levels of service (LOS). LOS is defined in the 2010 Highway Capacity Manual (HCM) as a quantitative stratification of a performance measure or measures that represent quality of service, measured on an A-F scale.

LOS takes into consideration factors such as freedom to maneuver, traffic interruptions, comfort and convenience, and safety (DEIR, pp. 5.0-169-170). Hence, traffic signals can provide more than just reduced delay and improved traffic flow. A traffic signal at the intersection of Temescal Canyon Road and Project Driveway No. 1 is not required (DEIR, p. 5.1-194). Mitigation measures **MM Trans 4** requires one traffic signal at the intersection of Temescal Canyon Road and Project Driveway No. 2, **MM Trans 5** requires one traffic signal at the intersection of Temescal Canyon Road and Project Driveway No. 3, and **MM Trans 6** requires one traffic signal at the intersection of Temescal Canyon Road and Project Driveway No. 4 (DEIR, p. 5.0-194). The intersections of Temescal Canyon Road and Project Driveway No. 2 and Temescal Canyon Road and Project Driveway No. 3 have unacceptable PM peak hour LOS F without mitigation (for Existing Plus Ambient Plus Project (Phase II) Plus Cumulative (2018) conditions). With the installation of traffic signals at Project Driveways No. 2 and 3, the PM peak hour LOS will improve to C for both intersections (the AM peak hour without the signals is an acceptable C, and improves to a LOS B for both intersections) (TIA, p. 66). The intersection of Temescal Canyon Road and Project Driveway No. 4 (**MM Trans 6**) improves from LOS D to LOS B with installation of the traffic signal. These mitigation measures are based on the Traffic Impact Analysis (TIA) prepared for this Project (DEIR Appendix G), which was reviewed and approved by County staff and prepared consistent with the County's methodology.

Additionally, **MM AQ 2** requires the Project to synchronize the Project's traffic signals at Project driveways and the intersection of Temescal Canyon Road and Indian Truck Trail which improves traffic flow by reducing acceleration/deceleration associated with stop-and-go traffic, hence reducing vehicular emissions (DEIR, p. 5.0-34).

Comment Letter H – Noss, Kelli & Remington

Comment letter H commences on the next page.

Brady, Russell

From: Kelli Noss <kelliv@msn.com>
Sent: Monday, July 09, 2018 3:51 PM
To: Brady, Russell
Subject: EIR No. 552 - Toscana Village at Temescal Valley (Comments)

To Whom It May Concern:

H-1 { We've reviewed the EIR and wanted to make two comments on the proposal. First, the spacing of the traffic signals on Temescal Canyon Road seem far too close and too congested for what the shopping center will need. It seems like a majority of the traffic will be coming immediately off of I-15 at Indian Truck Trail and from the communities south/west (Horsethief, Sycamore Creek) and that three opportunities to turn left back onto Temescal Canyon Road is overkill. One left turn lane out of the shopping center - like the Home Depot/Aldi/Big 5 shopping center in Lake Elsinore off of Central should be plenty since most of the traffic will be potentially turning right out of the shopping center. Second, the above-ground SCE lines should be moved to be underground like the surrounding area on Temescal Canyon Road that was updated during Terramor's early phases.

H-2 {

Thank you,

 Kelli & Remington Noss
 Temescal Valley Residents

Response to Comment Letter H – Noss, Kelli & Remington

Response to Comment H-1:

The commenter's opinion regarding traffic signals spacing too close and too congested for the shopping center needs is noted. The Traffic Impact Analysis (TIA) prepared for this Project (DEIR Appendix G), shows the proposed traffic controls will alleviate congestion. Only two new traffic signals are proposed at Project buildout (Phase II) in order to attain acceptable levels of service (LOS). LOS takes into consideration such factors as freedom to maneuver, traffic interruptions, comfort and convenience, and safety (DEIR, pp. 5.0-169-170). Hence, traffic signals can provide more than just reduced delay and improved traffic flow. A traffic signal at the intersection of Temescal Canyon Road and Project Driveway No. 1 is not required (DEIR, p. 5.1-194). Mitigation measures **MM Trans 4** requires one traffic signal at the intersection of Temescal Canyon Road and Project Driveway No. 2, **MM Trans 5** requires one traffic signal at the intersection of Temescal Canyon Road and Project Driveway No. 3, and **MM Trans 6** requires one traffic signal at the intersection of Temescal Canyon Road and Project Driveway No. 4 (DEIR, p. 5.0-194). The intersections of Temescal Canyon Road and Project Driveway No. 2 and Temescal Canyon Road and Project Driveway No. 3 have unacceptable PM peak hour LOS F without mitigation (for Existing Plus Ambient Plus Project (Phase II) Plus Cumulative (2018) conditions). With the installation of traffic signals at Project Driveways No. 2 and 3, the PM peak hour LOS will improve to C for both intersections (the AM peak hour without the signals is an acceptable C, and improves to a LOS B for both intersections) (TIA, p. 66). The intersection of Temescal Canyon Road and Project Driveway No. 4 (**MM Trans 6**) improves from LOS D to LOS B with installation of the traffic signal. The Temescal Canyon Road intersection with Project Driveway No. 1 is also stop controlled and includes a raised median on Temescal Canyon Road to prohibit left turns from Driveway No. 1 (DEIR, p. 5.0-185). These mitigation measures are based on the TIA prepared for this Project (DEIR Appendix G), which was reviewed and approved by County staff and prepared consistent with the County's methodology.

Additionally, **MM AQ 2** requires the Project to synchronize the Project's traffic signals at Project driveways and the intersection of Temescal Canyon Road and Indian Truck Trail which improves traffic flow by reducing acceleration/deceleration associated with stop-and-go traffic, hence reducing vehicular emissions (DEIR, p. 5.0-34).

Response to Comment H-2:

Approximately eight (8) existing Southern California Edison (SCE) power poles that are located along Temescal Canyon Road and the project site's frontage will need to be relocated. The power poles will generally remain in the same location within the existing SCE Right-of-Way. The relocation is an adjustment in elevation because the existing elevation (or ground level) where they are located and the proposed elevation after site grading and proposed improvements to the west side of Temescal Canyon Road are different. The elevation adjustments are anticipated to be completed by installing a new pole several feet away from the existing at the new elevation and then transferring the power lines from the previous pole to the new pole at the proper elevation (DEIR, p. 3.0-4).

The existing SCE power poles support several lines including SCE high voltage 115 kV (kilovolt) transmission lines (upper lines), 12 kV distribution lines (middle lines), and communication lines (lower lines) that go to the Ivyglen Substation located approximately 1-mile northwest of the Project site along Temescal Canyon Road on the west side of I-15. According to the SCE *Power Bulletin*, Volume 13 No. 4 May 2013 (https://www.sce.com/wps/wcm/connect/4a5ed5e3-b0e8-48cf-b7c3-8ba5000188a6/1304_PowerBulletin.pdf?MOD=AJPERES), “With safety, reliability, and affordability in mind, undergrounding transmission lines can cost up to 50 times more than an equivalent overhead line.” “Virtually all 230 kV and above high-voltage electrical transmission lines constructed are proposed as overhead infrastructure for three general reasons: cost, reliability, and environmental considerations.” “SCE’s preference for placing high voltage transmission lines on overhead structures is rooted in our responsibility to safely provide customers with the most affordable, reliable power possible. Underground construction has occurred nationally for lower voltage lines that power homes and businesses, typically, lines 33 kV and below. In rare instances, short portions of 115 kV, 230 kV, and 345 kV lines have been constructed underground.”

Riverside County zoning regulations indicate utilities shall be installed underground except that electrical lines rated at 33 kV or greater may be installed above ground. The proposed Project does not require installation of new electrical lines as it will connect to the existing SCE lines. As SCE’s existing poles support high voltage transmission lines (115 kV) they are not intended to be underground. Only elevation adjustments to approximately eight (8) existing SCE high voltage transmission lines will be made along the Project’s frontage with Temescal Canyon Road as required the Project’s grading activities.

Comment Letter I – Mucha, Rob

Comment letter I commences on the next page.

Rob Mucha Comments regarding EIR no 552, Toscana Village at Temescal Valley

- I-1 **Traffic Flow/Safety Significantly Impacted**
- I believe that this development would significantly impact the traffic flow and safety of both Temescal Canyon Road (TCR) and Indian Truck Trail, two of the main arteries in Temescal Valley. The Draft EIR does acknowledge briefly that there will be a significant impact to the on and off-ramps but it does not offer any sort of mitigation or recommendation to minimize the impact, and this impact, other than during construction, isn't even mentioned in the Executive Summary. Acknowledging significant impact in the draft EIR, especially related to the I15 ramps, without making improvement recommendations is counter to Temescal Canyon Area Plan guidelines:
- TCAP 11.3
- Evaluate proposed projects located adjacent to the right-of-way of any of the existing Interstate 15 interchanges for additional interchange improvements.
- I-2
- The 15 freeway and Temescal Canyon Road are the only North/South arteries through Temescal Valley and this project will likely negatively impact both.
- Temescal Canyon Road has fast moving vehicles, including large trucks with slow stopping ability, and this part of the highway is curved reducing visibility and thus stopping time. It is dangerous making left turns and U turns across Temescal Canyon Road but that's what this project would generate to an extreme level.
- Indian Truck Trail is the only freeway onramp heading north or south for miles. Temescal Canyon Road to the North is 2.9 miles away and Lake to the south is 3.5 miles away, and these distances are the more direct freeway routes; Temescal Canyon Road winds back and forth which makes the highway routes longer than the freeway. This is the primary on-ramp for most living in the large at Sycamore Creek, Horsethief Canyon, and developing Terramor HOAs and is already congested in commute hours. Significantly increasing the number of cars turning onto it, left turns that cross areas that already back up, and Temescal Canyon Road left turn queues that could back up to the onramps would be very problematic to traffic flow and decrease safety.
- I-3 **Anticipated Excessive Left Turns**
- It is very likely that a very large majority of gasoline customers to the area -- maybe over 90 percent of them -- would require a left turn across Temescal Canyon Road, and I am very concerned this consideration hasn't been adequately taken into consideration from a traffic flow and safety standpoint.
- The majority of local *residential* customers will likely come from come from the larger Sycamore Creek or Horsethief Canyon communities, and the significantly nearer entrance for them is from Indian Truck Trail or from the South on Temescal Canyon Road, which both require left turns on

I-3
Cont.

Temescal Canyon Road into the facility. Even the most north outlet road for Sycamore Creek is significantly closer via Indian Truck Trail than looping around Temescal Canyon Road.

Terramor is the only community in close proximity but those would also require a left turn over Temescal Canyon Road in that general area (and then right into facility). Butterfield Ranch is probably the only other community that would consider this area for gasoline but Temescal Canyon/15 gas stations are closer, and would not require the left across Temescal Canyon Road that this facility would. The most southern outlet from Butterfield Ranch is approximately 1.1 miles away from the existing Arco on Temescal Canyon Road/15 and would be approximately 2.1 miles to the new Arco. Residents north of Butterfield Ranch would also likely use the existing gas stations on TCR/15.

An even larger percentage of gas or fast food (or grocery store) customers from the freeway would require a left turn across Temescal Canyon Road. Again, the nearest off-ramp to the North is Temescal Canyon Road which has adjacent Arco and Shell gas stations and a fast food and other food alternatives (Carl's Jr and Tom's Farm's). Thus it is likely that virtually all freeway gasoline customer to the proposed site would exit at Indian Truck Trail and ultimately require a left turn onto Temescal Canyon road and again a left on Temescal Canyon Road to enter this facility. This would also be the case for nearly all fast food or new grocery store customers exiting Indian Truck Trail to visit that site.

Entry Points/Temescal Canyon Road Traffic Signals

I-4

My preference from a safety standpoint because of the speed of Temescal Canyon Road is a hard median from Indian Truck trail to the Terramor community entrance. Instead the draft EIR suggests two new left turn lights and a third for Phase II. Having two new lights (and a third) in such a small area is excessive and will significantly impact traffic flow. Comparatively, there are only two left turns (one light and one non light) on Campbell Ranch Road into the similar sized Vons center across the highway, and there are no other areas in the semi-rural Temescal Valley where there are so many planned lights in one small area. Not even the much larger Dos Lagos shopping center on Temescal Canyon Road in Corona has as much light density as is planned here.

Inadequate Queuing Distance

I-5

There is very little queuing distance for those making a left turn on Indian Truck Trail onto Temescal Canyon Road, which as described above is what I believe will be the only route for the large majority of customers. If this left turn backs up it will definitely negatively impact I15 on and off ramps in a way that does not happen today, and it could also increase the number of illegal dangerous U-turns on Temescal Canyon road south of Indian Truck trail as people make a temporary right to avoid queues. This important section is not addressed in enough detail in Traffic Impact Analysis/Draft EIR the Traffic Impact Analysis and I would like to see more study on exactly how many cars they believe can queue up at that left turn before impacting the on ramps. I'd also like the County to place a condition of approval for a hard median on Temescal

- I-5
Cont. { Canyon road to the South of Indian Truck trail for an appropriate distance to help reduce the number of dangerous u-turns that could happen there as a result of this project.
- I-6 { Please discuss how many cars is assumed will queue up at each of the driveways proposed at peak hour (for each operational phase using numbers for a completely built out Terramor). I am concerned that the south most left turn lane proposed, driveway 2, may be too close to Indian Truck Trail (450 feet). There needs to be ample space for those heading South on Temescal Canyon Road to queue up at the Indian Truck Trail light without potentially blocking the most southern exit from the facility (driveway 1). I would like to see more study on exactly how many cars are expected at peak hour will queue up at that right turn once Terramor is completely built out, and once each Phase of this project will be operational.
- I-7 { The Draft EIR suggests that synchronizing left turn lights may help alleviate traffic flow on Temescal Canyon Road. I'm concerned that this synchronizing of lights could create larger left turn queues on Indian Truck Trail and also cause an extended delay for anyone heading south on Temescal Canyon road, possibly resulting in more people running red lights in that area. I'm not convinced that the synchronizing of left turn lights will prevent large left turn queues on Temescal Canyon Road, especially driveway 2 (though am opposed to a left turn at driveway 1 as a possible solution). I am also oppose to any U turns on Temescal Canyon Road as they slow down left turn flow and would be more dangerous.

Please provide more detail on how you expect the synchronizing of lights to work to both Indian Truck Trail and Temescal Canyon Road at peak hour using a fully built out Terramor and fully operation Phase I and II.
- I-8 { **Car Trips Underestimated**

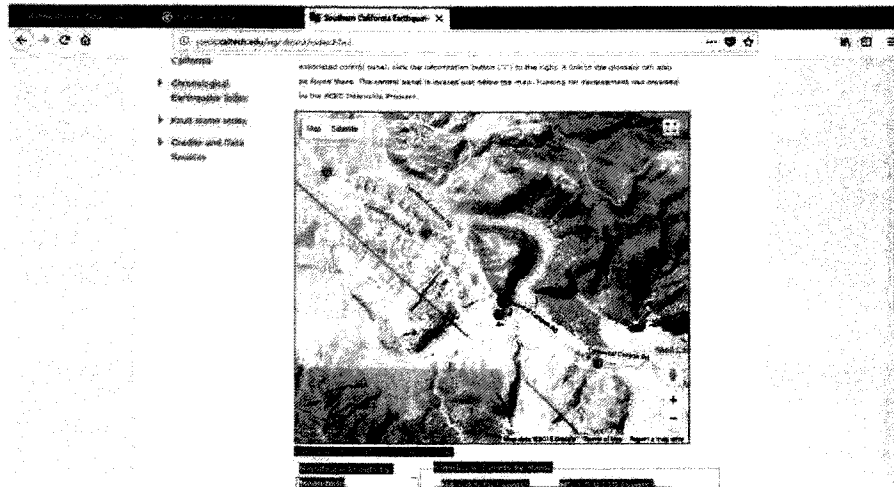
I am also very concerned that the Draft EIR may underestimate the number of car trips to the on and off ramps generated by the project at peak time. What percentage of customers were assumed would be also exiting the project at peak time? Many of these businesses are considered high volume and thus many trips at or before peak time would be thus round trips, exiting and reentering the freeway at peak time impacting ramp flow. Please provide more detail on expected traffic volumes entering or exiting, and whether or not a conservative factor was applied to it.
- I-9 { Also, with regard to comparing this project with a light Industrial one, I may have misunderstood the comparison but is the draft EIR really suggesting that the volume of car trips to a 12-pump Arco gas station, two drive through fast food restaurants, two high volume restaurants, other businesses, and grocery store would be similar to that of Alternative 3 Light Industrial (CD:LI)? If so, I disagree. There are over 1,100 parking spaces proposed, and most of the cars entering would be short stay or drive thru in nature, especially in commute hours. Most light industrial projects seem like they would have substantially less volume than that proposed and be less likely to have as many arrive at peak commute hours. Please provide more detail regarding the comparison assumptions between the two potential uses.

- I-10
- Existing Gas Station Area Comparison**
- I'm concerned that this project may ultimately be even more dangerous in terms of potential accidents, including fatal accidents, as the off ramp just north of it (Temescal Canyon Road/I15 gas station areas). I consider left turns into the Shell off Temescal Canyon Road north very dangerous as I do left turns heading south On Temescal Canyon Road into the Arco/Carl's Jr areas. The volume of the left turns expected into the proposed area would seem to be at least double of those planned for this project. For comparison of the potential dangers with this proposal, please provide three years of traffic accident data for the off ramp area to the north (TCR/15 near Shell and Arco/Carl's Jr).
- Also, the fairly recently implemented Arco on Dos Lagos/Weirick (two off-ramps away to the north of project) is another example where the ingress/egress impact was not well planned out and thus has had a much more significant impact to the flow and safety of the area than was anticipated. The Dos/Lagos/Weirick Arco is similarly continuously full with coming and going cars and it impacts Temescal Canyon Road as the majority of these customers are required to make a U turn on Temescal Canyon Road to get back on the freeway or to one of the larger communities to the west. Planning that the large majority of customers have to make a U turn or Left turn onto a major road near a freeway off-ramp simply doesn't work, but that is what is planned with this project.
- Transportation Model**
- I have read the Traffic Impact Analysis and understand the basic tiered approach to determining levels of significance. I have the following questions related to the inputs/assumptions used in the model:
- I-11
- Traffic Flow Assumption Too Optimistic**
- As discussed above I believe that a much larger percentage of customers than 60% will arrive from the freeway or from Horesethief or Sycamore Creek via Indian Truck Trail (all requiring left turns onto Temescal Canyon Road). The 60% used in modeling is more of a best case scenario than a conservative one. Similarly, 25% of customers approaching from north would be a best case scenario for the community in my opinion. I would prefer a much more conservative estimate used for modeling to determine potential impact and thus traffic signal recommendations. 80% via Indian Truck, 15% from the north, and 5% from the south on TCR seems of a more conservative trip distribution to me (actually more likely to me).
- I-12
- Changes Potentially Not Factored In**
- Some of the data used within the model may be outdated as the Traffic Impact Analysis assumes that Phase 1 would have been completed by 2017 and Phase II by 2018 (although the document is dated March 6, 2018). Peak hour data may likely be worse than planned (even with a growth factor) than those captured in May 2016. One large

- I-12 Cont. { freeway change, the 91/15 express lane project, which according to Anne Mayer (Executive Director RCTC), has moved the bottleneck south in Temescal Valley, and the separate newly started 15 freeway Express Lane expansion project has been started to likely impact the flow, yet again. Please discuss how these two large traffic flow projects have been accounted for in projections for this large project.
- I-13 { I understand that the transportation impact model utilized is the standard model used in Riverside County, but respectfully believe that the model itself is flawed in its assumption that impact is linear when in fact traffic impact is exponential in nature. For instance, it would be much easier for the transportation arteries to absorb large developments that move the Level of Service (LOS) from LOS A to LOS B, or even from LOS A to LOS C which would be a jump in two categories, than it would be to move from LOS D to LOS E, or even to absorb movement within the upper LOS D or LOS E categories themselves. That is the definition of an exponential curve, not linear, and the model needs to be updated so that movement within the higher/more impacted categories are given a more appropriate impact perspective than they are today.
- I-14 { Too often are projects often categorized in Planning Meetings as not having “significant impact” largely because the estimated car trips didn’t take it from one LOS category to the next (that the number itself didn’t exceed the semi-arbitrary rounded next level entry point). For instance, the number of trips just below a threshold number and just over the threshold have the same relative impact, even though one of the two is determined not significantly impacting. Also, a large number change within the category is considered “non significant” even though the absolute change could be rather significant. At a minimum, in future studies LOS D and LOS E service levels should be broken into sub categories to help identify the level of likely impact by the incremental growth. Please provide the current existing percentage within the Service Level for the on ramps and expected change percentage because of the project for both proposed phases.
- I-15 { The Traffic Impact Analysis, which I suggest above the flow numbers may not be conservative enough, states that the Indian Truck Trail off ramps are already performing at or near capacity at PM peak hours (LOS D and LOS E). Residents will definitely feel a difference if you add 1,499 more one way car trips (3,000 round trips?) at PM peak hour. Any model that suggests otherwise is flawed from a logic and thus traffic planning standpoint.
Regardless, the Traffic Impact Analysis estimates that the freeway on ramp infrastructure will significantly be impacted by the project if changes are not made to the on ramp infrastructure, according to Tables 5-8 and 5-9 on Pages 60 and 61, bumping categories up two levels to LOS D and LOS E in some cases. Between LOS C and D is the County target for the Temescal Canyon Plan, and CalTrans target as well.
- I-16 { The draft EIR Executive Summary suggests that Riverside County cannot direct project funds to CalTrans for changes or force CalTrans make the necessary changes which is why there are no

- I-16
Cont. { Conditions of Approval related fixing the on ramps. I understand the dilemma, but approving large high volume projects right next to the freeway in the hopes that one day the freeway ramp infrastructure will be improved may ultimately be why so many of the 15 corridor off ramps in western Riverside County are significantly overtaxed even at the hours before and after peak hour, such as I15/Limonite, 15/Magnolia, 15/Ontario, 15/El Cerrito, 15/Diamond, 15/Winchester, 15/H79, etc. It is not just residential growth alone that has impacted 15 freeway on and off ramp areas, it is the approval of high volume projects like this that from the onset that overtax existing infrastructure.
- I-17 { In summary, I believe the number of trips generated would be significantly more for the land use proposed, and planning so many left turns and/or u turns across Temescal Canyon Road and Indian Truck Trail seems poorly planned and dangerous. A more detailed traffic flow analysis should be completed to determine the level of significance related to these left turns and whether or not that many planned left turns would impact Temescal Canyon Road and/or Indian Truck Trail. Given our freeway existing onramp high LOS levels and no fixes imminently planned and the number of potential accidents in the area (including fatal accidents) I am opposed to the project.
- I-18 { **Non Concurrent Development**
I also believe that a development of this magnitude that would impact northbound/southbound flow, including just Phase I, shouldn't be started until the large ongoing 15 freeway improvements (express lanes to Cajalco) have been completed. Again, Temescal Canyon Road is our only other North/South artery other than the 15 throughout the Valley and is used by sheriff, fire/EMT, residents taking their kids to school, etc. when the 15 is backed up. Please place a condition of approval to not have construction occur the same time as 15 freeway expansion in Corona or Temescal Valley.
- I-19 { **Earthquake Zone Proximity**
The Draft EIR states that the proposed facility is not on an earthquake fault but it is in close proximity to the Lake Elsinore fault according to the California Institute of Technology, and an earthquake of 6.0 has been measured right next to the proposal site (see orange circle) according to their map (<http://scedc.caltech.edu/significant/index.html>). Their website claims that this fault zone is "one of the largest in Southern California" and estimates Probable Magnitudes at Mw6.5 - 7.5. Having a large earthquake centered nearly on the development area seems an indication that it is in an earthquake concern area, regardless of whether or not is literally on the fault.

I-19
Cont.



Please have the appropriate specialist validate that there are no concerns related to earthquake zone proximity.

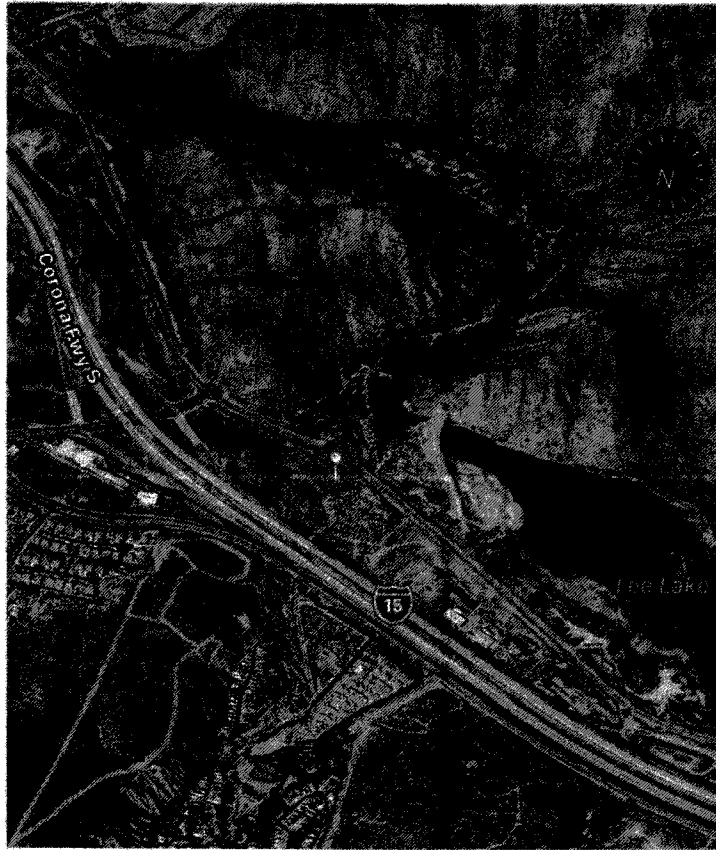
Impacts to Wash/Wildlife Crossing Area

Two large important Temescal Valley washes intersect just to the South of the proposed site, Temescal Canyon Wash and Indian Canyon Wash, and Temescal Canyon Wash also winds back near the northern part of the project.

I-20



I-20
Cont.



This large wash intersection is the main wildlife crossing zone in the area, and one of the largest in Temescal Valley. The fact that the project is in a high fire zone, close to a known earthquake fault, and naturally flows into the wash is concerning to me from a wildlife perspective. I'm concerned of the combination of danger factors in that area and potential for gas tank leakage into the wash (and down-stream Blue Line stream) may be underestimated in the draft EIR.

I-21

I'm also concerned about the number of large gas tanks in this area and the proximity of them buried so close to the washes and groundwater. How deep are the tanks expected to be placed and how much buffer is mandated between the tanks and high levels of the groundwater? I understand that gas tank technology has improved some, but there is a long history of gas tanks leaking throughout California, and gas leaks into streams and ground water are very impactful and expensive to restore (and some spills aren't restorable).

I-21
Cont.

Given the combination of danger factors, and likely traffic issues, I'd much prefer that this project not include a gas station, and especially a large one with 12 pumps. There is already a gas station across the highway in the Vons center, and there is already an overabundance of Arco gas stations throughout the valley. There are Arcos next to two of three off ramps just to the south (Nichols, Central), and next to the off ramps immediately to the north (Temescal Canyon, Weirick/Dos Lagos).

If a gas station is ultimately approved here, I request that a condition of approval be required for the safest gas tank construction in the industry in the year the gas tanks are installed, and annual testing for leakage and excessive vapor release using the most rigorous testing the year they are tested (testing criteria should be updated each year to the industry standard for high risk areas). I also request a condition of approval for a large bond (or equivalent) in perpetuity for an appropriate cleanup fund should it be needed for whatever reason related to the project site, such as a significant gas tank leak that isn't covered by the gasoline tenant and/or property owner's insurance.

Several main components of the Temescal Canyon Area Plan also reiterate the need to make the protection of washes and wildlife crossing areas as a high priority. Below are other excerpt from the Temescal Valley Area Plan:

Careful consideration is needed to preserve the Temescal Wash and accommodate the Multiple Species Habitat Conservation Plan, especially in terms of linkages under Interstate 15 at key points.

Watercourses

Temescal Wash is a major influence on the character of this area plan, traversing the length of it from northwest to southeast adjacent to Interstate 15. Policy direction in the area plan related to the Wash reflects a desire to buffer it from development so that its scenic and natural resource values are retained

I-22

The Temescal Wash creates an impressive swath pinched between the Gavilan Hills and the Santa Ana Mountains. Although dry most of the year, the wash serves as an outlet for Lake Elsinore and eventually drains into the Santa Ana River. While the wash runs in a generally northwest/southeast direction, it also provides a critical perpendicular linkage for animals between the mountain and hill habitats on either side. That is why the wash plays such an important role in the Western Riverside County Multiple Species Habitat Conservation Plan.

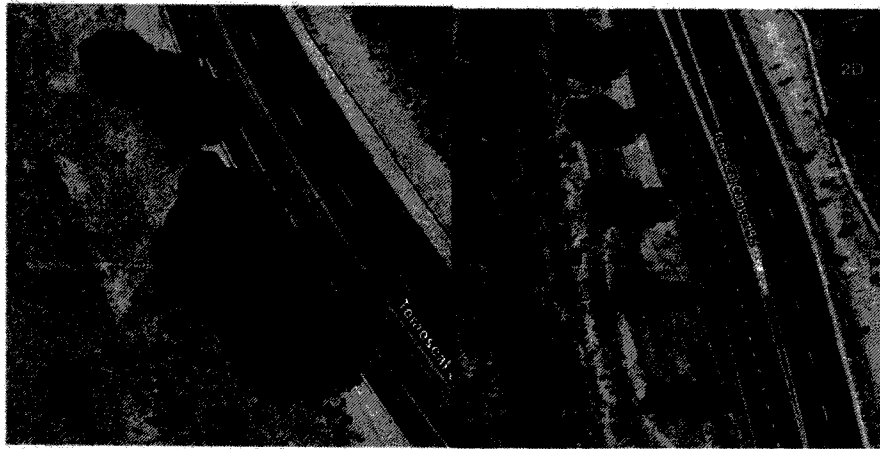
Temescal Wash

The Temescal Wash, extending 28 miles from Lake Elsinore to the Santa Ana River, is the principal drainage course within the Temescal Canyon. The Wash also serves as an important component of the Western Riverside County Multiple Species Habitat Conservation Plan and has the potential for providing recreational amenities to the Temescal Canyon. The preservation and enhancement of this feature is an important component of the Temescal Canyon Area Plan land use plan. This policy area is

- I-22
Cont.
 - coterminous with boundaries of the 100-year flood zone for the Wash, and spans the El Sobrante Landfill Policy Area, the East Temescal Hillside Policy Area, and the Serrano Policy Area. Policies:
 - TCAP 6.1
Protect the multipurpose open space attributes of the Temescal Wash through adherence to policies in the Flood and Inundation Hazards section of the Safety Element, the Watershed Management Floodplain and Riparian Area Management and Wetland sections of the Multipurpose Open Space Element, and the Open Space, Habitat and Natural Resource Preservation section of the Land Use Element in the General Plan.
 - TCAP 6.2
Encourage the maintenance of Temescal Wash in its natural state, with its ultimate use for recreational and open space purposes such as trails, habitat preservation, and groundwater recharge.
 - TCAP 5.9
Require the placement and design of roads to be compatible with the natural character of the river corridor
- I-23
 - I understand that the appropriate wildlife agencies have already approved the project based on the assumptions that it is not in a flood or earthquake zone, but request to have them reconsider this area based on the combination of dangerous factors discussed above before the project is moved forward for approval.
 - I am also concerned for some of the bird nesting areas there so close to the washes and with such conducive habitat as the California sage scrub, etc. I understand that nest/burrow identification has already been completed, and am supportive of the process of identifying nests, especially protected nests or burrows, again just prior to development, especially if the development gets delayed. I am for mitigation MM Bio-7 that recompletes appropriate bird nesting area identification and protection of identified nests just before each grading activity. I'm hopeful that identified nests be protected and protected chicks be safely relocated, when the time is appropriate.
- I-24
 - Impacts from Wash/Wildlife Crossing Area**
 - The draft EIR states that the location is not in a flood zone, but two large washes intersect a short walking distance from the site. I'd like for someone to confirm that indeed this site is not considered to be at and any risk from potential flooding.
- I-25
 - Oak Tree Resolution**
 - The draft EIR states that they will need to follow the Oak tree Removal but there has been significant disparity to the number of Oak trees that need to be appropriately handled than what the candidate communicated in one of the most recent community outreach meetings.

Because of this disparity, I request a more detailed listing and picture of the oaks in question and potentially a Condition of Approval regarding the specific oak trees.

The 10 oak trees specified in the draft EIR are more than the candidate communicated but I noted three groups of five oak looking trees that would be impacted by Phase I, and a fourth group of more than five to the north that sounds like it may not be impacted by Phase 2. The four groups are pictured below.



I-25
Cont.



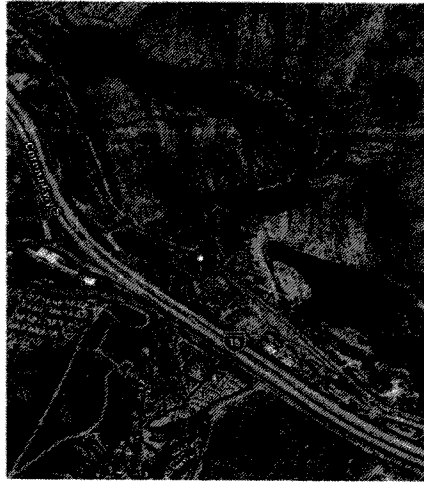
For clarity, please include a map and pictures of the actual protected oak trees in the final EIR.

Power Lines

I would prefer to have the power lines put underground in this scenic area. The Terramor development on the other side of the road improved the aesthetics of the area and relocating the lines above ground to a new spot would seem inconsistent with nearby improvements on this historic road, and inconsistent with Temescal Canyon Area Plan guidelines for putting powerlines underground whenever feasible near washes or streams.

TCAP 5.12

Discourage utility lines within the river corridor. If approved, lines shall be placed underground where feasible and shall be located in a manner to harmonize with the natural environment and amenity of the river.



I-26

As the picture shows, two large washes intersect just to the south of the proposal and the Temescal Canyon Wash approaches again to the north east. The area from Lee Lake through Terramor is one of the most publicly accessible parts of these large washes and the County really should use this opportunity to put the power lines underground at this proposed very public area.

Toscana Village Name

It's not a concern to me but it seems a little strange that they didn't change the name to Terramor Village when the Terramor development changed its name from Toscana to Terramor. Anything but Terramor would be less confusing.

I-27

Response to Comment Letter I – Mucha, Rob

Response to Comment I-1:

The Project's Traffic Impact Analysis (TIA), included as Appendix G in the Project's Draft Environmental Impact Report (DEIR), evaluates study area intersections, freeway segments, and freeway ramps based on Level of Service (LOS) threshold standards consistent with the County of Riverside requirements. As outlined in the Riverside County General Plan, LOS varies from "A" to "F" representing progressively worsening traffic conditions, and LOS "D" or better during peak hours is considered acceptable (DEIR, pp. 5.0-169, 5.0-179, 5.0-182). Per the TIA, all intersections, freeway segments, and freeway ramps will operate at an acceptable LOS (D or better), except for the following:

- Freeway Segment: I-15 southbound segment north of Indian Truck Trail
- Freeway Ramp: I-15 southbound off-ramp at Indian Truck Trail (DEIR, pp.5.0-186 – 5.0-188).

Thus, the Commenter's opinion that Temescal Canyon Road would have significant traffic flow or safety impacts is incorrect, as the TIA analysis shows that Temescal Canyon Road operates at an acceptable LOS after implementation of the proposed improvements identified in **MM Trans 2** through **MM Trans 7**.

A freeway segment and a freeway ramp associated with Indian Truck Trail do not achieve an acceptable LOS, ramp and freeway improvements that are necessary to change the LOS to an acceptable level and thus reduce impacts to less than significant. As stated in the DEIR, all state freeways are under the authority of Caltrans, and there is no mechanism that allows the Project's developer or proponents to construct improvements, pay fees, pay fair share contributions, or ensure such payments would be directed to specific freeway improvement projects. Since the County of Riverside does not have jurisdiction over freeway improvements, there is no feasible way to implement freeway segment or ramp improvements or implement mitigation measures related to freeway segments or ramps (DEIR, p. 5.0-193). This is why mitigation measures or recommendations cannot be offered in the DEIR to reduce this impact to less than significant. Consistent with the requirements of CEQA, the Project DEIR thus provides justification why mitigation for reducing the impacts associated with Indian Truck Trail and to on- and off-ramps is infeasible.

Response to Comment I-2:

It is true that the proposed Project will increase trips (traffic volumes) in the surrounding area (DEIR, p. 5.0-176). However, the Project provides for adequate sight distance and intersection improvements where warranted by traffic conditions (DEIR, p. 5.0-194; TIA, pp. 79-83). The alignment of Temescal Canyon Road will be consistent with County standards, as mandated by the Riverside County General Plan thus improving traffic conditions and safety (DEIR, pp. 5.0-181 – 5.0-184). The TIA was also reviewed and approved by the County of Riverside Transportation Department to ensure the Project complies with County standards.

Response to Comment I-3:

The comment supposes what proportion of trips will be entering the site with a left turning movement from Temescal Canyon Road. Although this comment does not state that the assumptions in the Draft EIR and TIA are incorrect, by noting the supposed proportion of trips making this left turning movement, it seems to speculate that the TIA did not adequately consider left turning movements across Temescal Canyon Road from a traffic flow and safety standpoint. As stated above, the Project's TIA was prepared to be consistent with the County of Riverside's methodology for evaluating traffic impacts (DEIR, pp. 5.0-169, 5.0-179, 5.0-182). Trip distribution data was based on anticipated travel patterns to and from the Project site, which are based on the proximity of the residential units to the proposed driveway locations, the surrounding trip attractors (residential communities, commercial opportunities, etc.), and the regional freeway interchanges (DEIR, p. 5.0-176). The trip distribution was developed by licensed traffic engineers using these factors and their professional judgement, as is the standard industry practice, which was coordinated with and approved by the County of Riverside Transportation Department. As shown in DEIR Figure 5.7-4, 75 percent of the daily inbound traffic is coming from Temescal Canyon Road from the south; of that, 50 percent are turning left into the Project at Driveway No. 3 and the remaining 25 percent are turning left into the Project at Driveway No. 4.

As outlined in the Riverside County General Plan, LOS varies from "A" to "F" representing progressively worsening traffic conditions, and LOS "D" or better during peak hours is considered acceptable (DEIR, pp. 5.0-169, 5.0-179, 5.0-182). Per the TIA, all intersections, freeway segments, and freeway ramps will operate at an acceptable LOS (D or better), except for the following:

- Freeway Segment: I-15 southbound segment north of Indian Truck Trail
- Freeway Ramp: I-15 southbound off-ramp at Indian Truck Trail (DEIR, pp.5.0-186 – 5.0-188).

Thus, the TIA analysis shows that Temescal Canyon Road operates at an acceptable LOS after implementation of the proposed improvements identified in **MM Trans 2** through **MM Trans 7**. This Project's design will also improve safety of left turns, such as the construction of additional left turn lanes, stop sign installation, and traffic signal installation (DEIR, pp. 5.0-184 – 5.0-185, 5.0-193 – 5.0-195).

Response to Comment I-4:

Per mitigation measures **MM Trans 4**, **MM Trans 5** and **MM Trans 6**, the Project will install traffic signals at the intersections of Temescal Canyon Road and Project Driveway No. 2, 3 and 4, respectively (DEIR, p. 5.0-194). A traffic signal is not required at the intersection of Temescal Canyon Road and Project Driveway No. 1 (DEIR, p. 5.1-194). The Temescal Canyon Road intersection with Project Driveway No. 1 is stop controlled (stop sign) and includes a raised median on Temescal Canyon Road to prohibit left turns from Driveway No. 1 (DEIR, p. 5.0-185). These mitigation measures are based on the TIA prepared for this Project (DEIR Appendix G),

which was reviewed and approved by County staff and prepared consistent with the County's methodology.

Additionally, mitigation measure **MM AQ 2** requires these signals to be synchronized (DEIR, p. 5.0-34). Synchronizing traffic signals improves traffic flow by reducing acceleration/deceleration associated with stop-and-go traffic. The signals proposed are separated by at least 0.1 miles, which is similar to signalized intersections at Dos Lagos and the Vons shopping center identified in the comment.

As part of the Project design, the Project will construct a raised median along Temescal Canyon Road to prohibit left turns from Project Driveway 1 (DEIR, p. 5.0-185). This is consistent with the General Plan Circulation Element and street classification cross-sections, which identify raised medians for arterial highways such as Temescal Canyon Road (TIA, p. 13).

Response to Comment I-5:

The Project's TIA evaluates study area intersections, freeway segments, and freeway ramps based on Level of Service (LOS) threshold standards consistent with the County of Riverside requirements. As outlined in the Riverside County General Plan, LOS varies from "A" to "F" representing progressively worsening traffic conditions, and LOS "D" or better during peak hours is considered acceptable (DEIR, p. 5.0-169, 5.0-179, 5.0-182). Per the TIA, all intersections will operate at an acceptable LOS D or better after implementation of the proposed improvements identified in **MM Trans 2** through **MM Trans 7**, including the intersection of Temescal Canyon Road and Indian Truck Trail (DEIR, p. 5.0-194). No improvements to the left turn lane onto Temescal Canyon Road from Indian Truck Trail were required to meet LOS standards.

The Project's TIA includes a queuing analysis for each of the four Project driveways (1, 2, 3, and 4), in addition to analyzing the LOS of the driveways with Temescal Canyon Road (TIA, p. 83; DEIR, p. 5.0-187). The definition of LOS considers the formation of queues (TIA, p. 7). The TIA doubled the average number of vehicles queued in the northbound direction at Project driveways in order to base these recommendations on conservative assumptions (TIA, p. 83).

Per the queuing analysis, the TIA recommended the following improvements, which are also listed as Project design features in the DEIR (pp. 5.0-184 – 5.0-185):

- Construct a 450 foot (minimum) northbound left turn lane at driveway 2.
- Construct a 300 foot (minimum) northbound left turn lane at driveway 3.
- Construct a 100 foot (minimum) northbound left turn lane at driveway 4 (TIA, p. 83).

All the Temescal Canyon Road and driveway intersections will have an acceptable LOS after implementation of the proposed improvements identified in **MM Trans 2** through **MM Trans 6** (DEIR, p. 5.0-194).

Response to Comment I-6:

Please refer to Response to Comment I-5 for a discussion of queuing analysis done for this Project.

Response to Comment I-7:

Excessive traffic queuing occurs when surface street traffic backups in one or more through lanes to an intersection that is upstream or when turn lanes volumes overflow such that vehicles waiting to turn back up into the through lanes. These excessive queuing situations can occur when signals are not synchronized; thus, synchronizing signals associated with the Project is a key way to address queuing. Per mitigation measures **MM Trans 4**, **MM Trans 5**, and **MM Trans 6**, the Project will install traffic signals at the intersections of Temescal Canyon Road and Project Driveway No. 2, 3 and 4, respectively (DEIR, p. 5.0-194). The Temescal Canyon Road intersection with Project Driveway No. 1 is also stop controlled and includes a raised median on Temescal Canyon Road to prohibit left turns from Driveway No. 1 (DEIR, p. 5.0-185). These mitigation measures are based on the TIA prepared for this Project (DEIR Appendix G), which was reviewed and approved by County staff and prepared consistent with the County's methodology. Please refer to Response to Comment I-5 for a discussion of queuing analysis done for this Project.

Additionally, mitigation measure **MM AQ 2** requires these signals to be synchronized (DEIR, p. 5.0-34).

Please refer to Response to Comment I-5 for a discussion of the queuing analysis done for this Project.

Thus, adequate improvements have been incorporated into the Project's design and mitigation measures to maintain acceptable traffic flow and queuing.

Response to Comment I-8:

The Project's DEIR provides the trip volumes during AM and PM peak hours for freeway ramps in the Project area, all of which are within an acceptable LOS except for I-15 southbound off-ramp at Indian Truck Trail (DEIR, p. 5.0-188). The Project's TIA outlines the methodology used to determine freeway ramp trip density and LOS to be consistent with County standards; the TIA methodology thus uses HCS2010 Ramps Version 6.65 software (DEIR, p. 5.0-171; TIA, p. 10). Data for Project trip generation by land use was sourced from data collected by the Institute of Transportation Engineering (ITE) Trip Generation Manual, 9th Edition, 2012 (DEIR, p. 5.0-172; TIA, p. 21-23). Trip generation includes pass-by trips (trips where the Project is not the primary destination; they are intended to "pass-by" the Project on their way to their destination) which has been estimated per County approval as a conservative 15% of trips. This is much less than ITE recommendation of up to approximately 50 or 56% (depending on the land use) of trips being pass-by trips. The Project used a conservative 15% in order to ensure a high estimate of project traffic (TIA, p. 22). It's important to consider that the Project is a commercial development designed to serve existing residents, providing a convenient location for shopping and

employment opportunities. By developing a variety of uses to serve nearby residential uses, the Project presents an opportunity to reduce the distance of existing trips made to shop and work (DEIR, p. 3.0-5).

Response to Comment I-9:

The DEIR included an analysis of the following alternatives: Alternative 1, a No Project/ No Development alternative, Alternative 2, a No Project/ Existing General Plan Designation Alternative (entire site as Light Industrial), and Alternative 3, a Mixed Use: Light Industrial and Commercial Retail (Phase I Commercial Retail and Phase II Light Industrial).

A comparison of the number of truck trips generated between Alternative 2 (all Light Industrial) and the proposed Project was made in the DEIR, Section 7.0 Alternatives. As outlined on page 7.0-8 of the DEIR:

Transportation/Traffic

Under the No Project/Existing General Plan Designation Alternative, the warehousing use would generate a higher number of truck trips which would replace other vehicle trips associated with commercial/retail use.

The DEIR indicates that with this alternative a higher proportion of the trips generated would be with trucks as compared to passenger cars. It does not state, nor was it intended to imply, that there are a larger number of total trips, or total volume generated from Light Industrial Use as compared to Commercial/ retail.

To further clarify, when comparing Light Industrial land use to Commercial Retail on a square footage basis, light industrial would generate less trips overall but more of them would be made by trucks and those truck trips would be over longer distances whereas retail commercial would generate a larger total number of passenger car trips. Therefore, it is correct that when comparing Light Industrial to Commercial Retail land uses the Commercial Retail land uses would generate more trips per square foot than that of Light Industrial.

Response to Comment I-10:

The Project's TIA evaluates study area intersections, freeway segments, and freeway ramps based on LOS threshold standards consistent with the County of Riverside requirements. LOS is defined in the 2010 Highway Capacity Manual as a quantitative stratification of a performance measure or measures that represent quality of service, measured on an A-F scale. To address the Commenter's safety concerns regarding Project-generated traffic, the LOS thresholds used in the Project's TIA include traffic safety as part of its threshold criteria (TIA, p. 8). As outlined in the Riverside County General Plan, LOS varies from "A" to "F" representing progressively worsening traffic conditions, and LOS "D" or better during peak hours is considered acceptable (DEIR, p. 5.0-169, 5.0-179, 5.0-182). Per the TIA, all intersections, freeway segments, and freeway ramps will operate at an acceptable LOS (D or better), except for the following:

- Freeway Segment: I-15 southbound segment north of Indian Truck Trail

- Freeway Ramp: I-15 southbound off-ramp at Indian Truck Trail (DEIR, p.5.0-186 – 5.0-188).

Thus, the TIA analysis shows that Temescal Canyon Road operates at an acceptable LOS. Additionally, the Project will improve traffic flow and safety by including Project design features and mitigation measures that include providing signals (when warranted), synchronization, and circulation design (DEIR pp. 5.0-184 – 5.0-185, 5.0-193 – 5.0-195, 5.0-34). These Project design features and mitigation measures provide consistency with Riverside County traffic standards, including standards to minimize curves and provide adequate sight distance (DEIR, p. 5.0-181 – 5.0-184).

Response to Comment I-11:

The Commenter discusses his belief that the methodology used for traffic flow and trip distribution is inadequate. This is the Commenter's opinion and is noted. The Project's TIA was prepared to be consistent with Riverside County's methodology for determining traffic impacts, which relies upon the Transportation Research Board – Highway Capacity Manual (HCM) methodology (DEIR, p. 5.0-169; TIA, p. 8). Trip distribution data was based on anticipated travel patterns to and from the Project site, which are based on the proximity of the residential units to the proposed driveway locations, the surrounding trip attractors (residential communities, commercial opportunities, etc.), and the regional freeway interchanges (DEIR, p. 5.0-176). The trip distribution was developed by licensed traffic engineers using their professional judgement, as is the standard industry practice, which was coordinated with and approved by the County of Riverside Transportation Department.

Response to Comment I-12:

Additional growth that would occur after 2017 and 2018 would be captured in the 2035 With Project Conditions analysis (TIA, pp. 73-77). There is also a 2035 Without Project Conditions analysis provided in the TIA for comparison (TIA, pp. 67, 70-73). The 2035 scenarios do not include the freeway improvement projects mentioned by the Commenter, which will benefit motorists once completed by reducing traffic delays and relieving local street congestion.⁴

Response to Comment I-13:

The Commenter outlines his reasoning for thinking that Riverside County's methodology for evaluating traffic impacts is flawed. This is the Commenter's opinion and it is noted. The Project's TIA was prepared to be consistent with Riverside County's methodology for determining traffic impacts, which relies upon the Transportation Research Board – Highway Capacity Manual (HCM) methodology (DEIR, p. 5.0-169; TIA, p. 8).

⁴ <http://www.sr91project.info/project-benefits> and <http://15project.info/wp-content/uploads/2018/07/I-15-Express-Lanes-Fact-Sheet-20180717.pdf>

Response to Comment I-14:

The TIA for the Project DEIR uses Riverside County's threshold standards – LOS - to analyze traffic impacts (TIA, p. 7-8). Riverside County categorizes LOS "A" through "F" to denote decreasing traffic conditions and does not provide sub-categories within each LOS. Since traffic studies for development projects (such as the proposed Project) must maintain consistency with the Riverside County General Plan, future studies cannot evaluate LOS sub-categories until such a time that the County amends its thresholds. Therefore, the Project will not make changes to the LOS levels per the Commenter's suggestions.

Regarding the Commenter's request for the existing percentage within LOS density ranges for the on-ramps, The DEIR provides the information necessary for such a comparison by providing the LOS criteria for freeway ramps is in **Table 5.0-V: Freeway LOS Criteria** and the density for the existing conditions and the Project (Phase I and Phase II) is provided in **Table 5.0-AA: Freeway Ramp Analysis**. However, this type of analysis is not necessary to determine the level of impact. For example, as shown in **Table 5.0-AA**, the density during the PM peak hour at the I-15 southbound off-ramp under Project (Phase II) conditions is 37.5 passenger cars per mile per lane (pc/mi/ln). This corresponds to LOS E, which as shown in **Table 5.0-V** is defined as a density greater than 35.0. Under existing conditions, this off-ramp also operates at LOS E, with a density of 35.7. Hence, the data provided is sufficient to evaluate the impacts and the requested percentages are not needed.

Response to Comment I-15:

Per the Project's DEIR TIA, freeway ramps at Indian Truck Trail (which includes I-15 southbound and northbound on- and off-ramps) are operating at an acceptable LOS (a LOS of "D" or better) except for under the following conditions, which are at an E LOS:

- Southbound Off-ramp during PM peak hour, existing conditions
- Southbound Off-ramp during PM peak hour, existing plus project (phase I and II) conditions
- Southbound Off-ramp during PM peak hour, existing plus ambient plus project (phase I) conditions
- Southbound Off-ramp during PM peak hour, existing plus ambient plus project (phase II) conditions (DEIR, p. 5.0-188)

Thus, the Commenter is correct that the southbound off-ramp at Indian Truck Trail is performing "at capacity" (at an unacceptable LOS), but the northbound off-ramp and northbound and southbound on-ramps are still within an acceptable LOS. It is also true, as the Commenter states, that this impact to only the southbound off-ramp at Indian Truck Trail will remain unless changes are made to the on-ramp infrastructure. Since the County of Riverside does not have jurisdiction over freeway improvements, there is no feasible way to implement freeway segment or ramp improvements or implement mitigation measures related to freeway segments or ramps (DEIR p. 5.0-193).

However, the number of trips on Indian Truck Trail off-ramps during PM peak hour is not, as indicated in the comment, 1,499 trips; 1,499 is the PM peak hour (one-way) trip volume for the entire buildout of the Project, which do not all exclusively occur on Indian Truck Trail off-ramps (DEIR, p. 5.0-176). The number of PM peak hour trips on Indian Truck Trail are shown in **Table 5.0-AA** of the DEIR (p. 5.0-188), which is significantly less than 1,499 under all development scenarios.

The analysis in the TIA for the Project DEIR uses Riverside County's threshold standards – LOS - to analyze traffic impacts. Per the County of Riverside, a LOS of A – D is considered acceptable for this Project site (DEIR, p. 5.0-169; TIA, pp. 7-8). Further, the TIA evaluated traffic impact scenarios (existing conditions, existing plus project (phase I and II) conditions, etc.) which are consistent with County of Riverside requirements (DEIR, p. 5.0-179). Thus, this methodology of analyzing impacts is adequate because it reflects changing traffic conditions as required by the County of Riverside.

Response to Comment I-16:

As the Commenter has acknowledged, the County of Riverside does not have jurisdiction over freeway improvements, Caltrans does, and there is no mechanism for the County or Project proponents to fund or implement freeway ramp improvements. The DEIR did consider the cumulative impacts of traffic from other projects within the study area that are expected to have an impact on LOS, which was included in the TIA analysis and discussed in Section 6.1.7 of the DEIR. It's important to consider that the Project is a commercial development designed to serve existing residents, providing a convenient location for shopping and employment opportunities. By developing a variety of uses to serve nearby residential uses, the Project could in fact reduce the distance of existing trips made to shop and work (DEIR, p. 3.0-5). For the main purposes of CEQA to inform the public and decision makers, the conclusion of the EIR that the Project may result in a potentially significant impact will be presented to the Board of Supervisors for their consideration on whether to approve the Project or not.

Response to Comment I-17:

The Commenter summarizes his prior comments regarding concerns of traffic impacts, and concludes that, due to these concerns, the Commenter opposed the Project. Please refer to the above responses to address the concerns made in this comment, which were previously stated. The Commenter's opposition to the Project is noted.

Response to Comment I-18:

The Commenter states his concern that other development in the area (I-15 freeway improvements) will worsen traffic conditions, and suggests the proposed Project include a condition to not begin construction at the same time as I-15 improvements. This is the Commenter's opinion and is noted. However, Riverside County does not condition development projects dependent upon freeway improvements because freeway improvements are not within the County's jurisdiction (they are in Caltrans' jurisdiction) and consequently outside of the County's control (DEIR, p. 5.0-193).

Response to Comment I-19:

The Commenter discusses their concerns of the project area being in close proximity to the Lake Elsinore fault by providing information and maps from California Institute of Technology. The DEIR did include an evaluation of the Project's proximity to an earthquake fault and the potential to expose people or structures to adverse effects from the rupture of an earthquake fault. As outlined in Appendix A, the Initial Study/ Notice of Preparation (IS/NOP) of the DEIR, on page 21, a geotechnical investigation was conducted by Matrix Geotechnical Consulting for the Project site and a report was prepared. The geotechnical investigation report was prepared by a registered professional geologist and geotechnical engineer certified by the State of California. This report presents the results of the review of pertinent geologic and geotechnical reports; the results of the field mapping and reconnaissance, field bore logs, field performed falling-head infiltration tests, laboratory testing, and presents the geologic and engineering judgment, opinions, conclusions, and recommendations pertaining to the geotechnical design and feasibility aspects of the proposed Project. Per the geotechnical report, a possible fault trace located within approximately 200 feet of the eastern portion of the property was found. The fault trace appears to control the contact of a portion of the Cretaceous Estelle Mountain Volcanics with very old Quaternary alluvial deposits just east of Temescal Canyon Road. The presence of this postulated fault is not likely to affect the site with strong ground motions.

This trace fault is shown east of and adjacent to the Project site in Figure 5 – Earthquake Faults in the IS/NOP Appendix A of the DEIR. The Elsinore Fault Zone and fault lines located southwest of the Project site are also shown in Figure 5 – Earthquake Faults in Appendix A of the DEIR. It is anticipated that the trace fault identified and evaluated in the Matrix Geotechnical Report and shown in Figure 5 of Appendix A of the DEIR is the same fault as identified in the California Institute of Technology map referenced by the Commenter.

As outlined in the IS/NOP, the proposed Project includes construction of new buildings that are required to be constructed in accordance with the current California Building Code (CBC) as reference in Chapter 15.12 (Uniform Building Code) of the Riverside County Code, which establishes, in part, requirements for buildings to be structurally sound to withstand strong earthquakes as the commenter notes as being probable, would apply to the Project and therefore, potential impacts related to rupture of an earthquake fault and seismic ground shaking is less than significant.

Response to Comment I-20:

The DEIR included an evaluation of the proposed Project's potential to impact wildlife corridors. As outlined in the DEIR (p. 5.0-58),

The proposed development is located adjacent and parallel to Temescal Wash and will not impact Temescal Canyon Wash or habitat associated with the wash. No migratory corridors or linkages are located on the project site, and the proposed development will not affect any migratory corridors or linkages in the vicinity of the project site.

The "large wash intersection" referred to by the Commenter is located southeast of the project site and would not be affected by the proposed project. Responses related to gas tank leakage are included in Response to Comment I-21 below.

Response to Comment I-21:

Phase I of the proposed Project does include a gas station that will have underground storage tanks of gasoline for dispensing at the pumps. Underground storage tanks are regulated by the California Water Boards (State Water Resources Control Board and the Regional Water Quality Control Boards) pursuant to Title 23 of the California Code of Regulations, Chapter 16.⁵ The purpose of the Underground Storage Tank (UST) Program is to protect public health and safety and the environment from releases of petroleum and other hazardous substances from tanks.⁶ There are four program elements:

1. Leak Prevention – The leak prevention program element includes requirements for tank installation, construction, testing, leak detection, spill containment, and overflow protection. Certified Unified Program Agencies (CUPAs) are the implementing agencies for the Leak Prevention program element.
2. Clean Up – Cleanup of leaking tanks often involves a soil and groundwater investigation and remediation, under the direction of a regulatory agency.
3. Enforcement – The State Water Resources Control Board provides assistance to local agencies enforcing UST requirements.
4. Tank Tester Licensing – Tank integrity testing is required by law, must meet the requirements of the State Water Resources Control Board, and must be conducted by State licensed tank testers.

The proposed underground storage tanks are required to meet all of the UST Program requirements which are enforced by the State Water Resources Control Board. With compliance with these requirements, potential leaks from underground tanks into the soils and potentially into groundwater and Temescal Wash are minimized.

Vapor release from the gas station is regulated by the California Air Resources Board. The California Air Resources Board's (CARB) Vapor Recovery Program controls vapor emissions from gasoline marketing operations (gasoline dispensing facilities or service stations, tanker trucks, bulk plants, and terminals), where gasoline vapor is a precursor to the formation of ozone and contains benzene, a constituent of gasoline vapor that has been identified as a toxic air contaminant.⁷

Response to Comment I-22:

The Project site is located within the Elsinore Area Plan of the Riverside County General Plan as shown in the DEIR Figure 3.0-4, Riverside County Area Plans. The Project site is directly adjacent to and southeast of the Temescal Canyon Area Plan with the project's northern boundary abutting the Temescal Canyon Area Plan boundary.

⁵ https://www.waterboards.ca.gov/ust/regulatory/docs/title23_d3_c16.pdf

⁶ <https://www.waterboards.ca.gov/ust/>

⁷ <https://ww2.arb.ca.gov/our-work/programs/vapor-recovery/about>

The DEIR included a thorough and complete evaluation of the proposed Project's potential to impact on sensitive biological resources and the Project's compliance with the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP).

As outlined in Response to Comment I-20 above and in the DEIR (p. 5.0-58),

The proposed development is located adjacent and parallel to Temescal Wash and will not impact Temescal Canyon Wash or habitat associated with the wash. No migratory corridors or linkages are located on the project site, and the proposed development will not affect any migratory corridors or linkages in the vicinity of the project site.

Further, as outlined in the DEIR (pp. 5.0-49 – 5.0-51), the proposed Project is in compliance with the MSHCP as follows:

The Project site is located within the Western Riverside County MSHCP, which is the only HCP/NCCP or other conservation plan in the Project area.

Reserve Assembly

The Project site is located within Estelle Mountain/Indian Canyon Subunit of the Elsinore Area Plan of the Western Riverside County MSHCP. The proposed project is primarily located in Criteria Cell 3448 with portions of the project site extending into Criteria Cells 3349 and 3350. These cells contribute to the assembly of the Proposed Extension of Existing Core 2 which consists of habitat associated with Temescal Canyon Wash and adjacent upland areas. The primary goal of this Cell group focuses on riparian scrub, woodland, forest, and Riversidean alluvial fan sage scrub habitat associated with Temescal Wash and provides habitat and movement for listed species. A Habitat Acquisition and Negotiation Strategy (HANS) application was submitted to the Riverside County Planning Department for this Project in February 2012. It was determined by the Riverside County Planning Department on February 16, 2012, that the proposed Project site is not within proposed conservation for the MSHCP. Therefore, no portion of the Project site is required to be conserved for MSHCP Reserve Assembly.

Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools (Section 6.1.2)

Section 6.1.2 of the MSHCP outlines the process through which protection of riparian/riverine areas and vernal pools would occur. Projects that result in unavoidable impacts to riparian/riverine or vernal pool resources require a Determination of Biologically Equivalent or Superior Preservation (DBESP) to be made by Riverside County as the Permittee to ensure replacement of any lost functions and values of habitat as it relates to Covered Species. Conservation of these areas is intended to protect habitat that is essential to a number of listed, water-dependent amphibians, birds, fish, invertebrates, and plants. As required by the MSHCP, a DBESP analysis for the project site has been prepared to address expected impacts to riverine, riparian and wetland habitats.

Therefore, through compliance with the MSHCP impacts to Covered Species and riparian/riverine/wetland habitat impacts would be less than significant.

Potential impacts from the Project site's proximity to earthquake faults is addressed in Response to Comment I-19 above.

Response to Comment I-23:

The DEIR evaluated the Project's potential impacts to nesting birds. The DEIR acknowledged that the site supports potential nesting habitat and included mitigation to reduce potential impacts to nesting birds to less than significant levels. Per the DEIR (p. 5.0-39),

Migratory Nesting Birds and Raptors

The plant communities within and adjacent to the Project site, have the potential to provide suitable nesting opportunities for raptors and passerines.

Mitigation measure **MM BIO 7** of the DEIR (p. 5.0-62) requires a pre-construction clearance survey for nesting birds prior to issuance of grading permits if ground-disturbing activities or vegetation clearing should occur in the nesting season. If active nests are found, they must be avoided with appropriate buffers. Mitigation measure **MM BIO 6** requires a pre-construction survey for burrowing owls, avoidance of active nests, and passive relocation outside of the nesting season.

Response to Comment I-24:

As outlined above in Response to Comment I-20, the "large wash intersection" referred to by the Commenter is located southeast of the Project site, southwest and across Temescal Canyon Road and Indian Truck Trail Road and would not be affected by the proposed Project.

The DEIR Appendix A, IS/NOP indicates (page 31) that the proposed Project site is not located within a 100-year flood hazard zone as mapped in the County's General Plan Figure S-9.

Response to Comment I-25:

As outlined in Response to Comment E-2 above, the DBESP report identified that the 0.03-acre of coast live oak riparian forest, including individual coast live oak trees, will be avoided by the proposed development Project (including mass grading, building pads, parking lots, driveways, etc.) and left in place. Separate from the mapped 0.03-acre coast live oak riparian forest in the northern extent of the project are the twelve (12) individual oak trees located along the Project's eastern frontage and Temescal Canyon Road. The proposed Project is required to construct ultimate improvements to Temescal Canyon Road along the Project's frontage including additional paving, curb and sidewalk. The existing twelve (12) coast live oak trees along Temescal Canyon Road and the Project's eastern frontage require removal and will be lost. As outlined above, the mitigation for impacts to the oak trees is replacement at a ratio of 3:1 within onsite conserved areas. The project will be conditioned to prepare and implement a Oak Tree Mitigation and Monitoring plan to ensure the survival and success of the re-planted oak trees.

Response to Comment I-26:

Approximately eight (8) existing Southern California Edison (SCE) power poles that are located along Temescal Canyon Road and the project site's frontage will need to be relocated. The power poles will generally remain in the same location within the existing SCE Right-of-Way. The relocation is an adjustment in elevation because the existing elevation (or ground level) where they are located and the proposed elevation after site grading and proposed improvements to the west side of Temescal Canyon Road are different. The elevation adjustments are anticipated to be completed by installing a new pole several feet away from the existing at the new elevation and then transferring the power lines from the previous pole to the new pole at the proper elevation (DEIR, p. 3.0-4).

The existing SCE power poles support several lines including SCE high voltage 115 kV (kilovolt) transmission lines (upper lines), 12 kV distribution lines (middle lines), and communication lines (lower lines) that go to the Ivyglen Substation located approximately 1-mile northwest of the Project site along Temescal Canyon Road on the west side of I-15. According to the SCE *Power Bulletin*, Volume 13 No. 4 May 2013 (https://www.sce.com/wps/wcm/connect/4a5ed5e3-b0e8-48cf-b7c3-8ba5000188a6/1304_PowerBulletin.pdf?MOD=AJPERES), "With safety, reliability, and affordability in mind, undergrounding transmission lines can cost up to 50 times more than an equivalent overhead line." "Virtually all 230 kV and above high-voltage electrical transmission lines constructed are proposed as overhead infrastructure for three general reasons: cost, reliability, and environmental considerations." "SCE's preference for placing high voltage transmission lines on overhead structures is rooted in our responsibility to safely provide customers with the most affordable, reliable power possible. Underground construction has occurred nationally for lower voltage lines that power homes and businesses, typically, lines 33 kV and below. In rare instances, short portions of 115 kV, 230 kV, and 345 kV lines have been constructed underground."

Riverside County zoning regulations indicate utilities shall be installed underground except that electrical lines rated at 33 kV or greater may be installed above ground. The proposed Project does not require installation of new electrical lines as it will connect to the existing SCE lines. As SCE's existing poles support high voltage transmission lines (115 kV) they are not intended to be underground. Only elevation adjustments to approximately eight (8) existing SCE high voltage transmission lines will be made along the Project's frontage with Temescal Canyon Road as required the Project's grading activities.

The proposed Project will not affect any power poles and lines outside of the Project site, including areas to the southeast of Indian Truck Trail Road and east of I-15 as identified by the Commenter.

Response to Comment I-27:

Comment noted.

Comment Letter J – Paul, Barbara

Comment letter J commences on the next page.

Brady, Russell

From: bob paul <bobnbarb01@sbcglobal.net>
Sent: Monday, July 09, 2018 8:02 AM
To: Brady, Russell
Subject: Comments on Environmental Impact Report No. 552 (EIR) for Toscana Village at Temescal Valley

To: Russel Brady

I am in favor of the Toscana Village project; the project will add much-needed services to the Temescal Valley region. However, I do have two comments which are listed below:

J-1 { 1.) Temescal Canyon Road is the MAIN ALTERNATIVE to the I-15 freeway, and has heavy car and mining/large rock hauling traffic during both normal and rush hours. Currently, Temescal Canyon Road becomes the ONLY ALTERNATIVE when the I-15 freeway is shut down in one direction, or when shut down completely. The plan to add four (4) traffic signals between the Indian Truck Trail intersection and the Terramor residential development is EXCESSIVE, and will certainly become a continual traffic nightmare. I request there only be one (1) traffic light in the Toscana Village project, with perhaps another "right turn only" exit from Toscana Village onto southbound Temescal Canyon Road.

J-2 { 2.) I request that the Toscana Village project be required to "underground" the Edison transmission lines to coincide with the Terramor development.

Thank you for your strong consideration of my two comments; please be forward-thinking, and do the right thing from the start !

Barbara Paul
 25999 Glen Eden Road, Site 147
 Temescal Valley, CA 92883
 bobnbarb01@sbcglobal.net
 (951) 818-2580

Response to Comment Letter J – Paul, Barbara

Response to Comment J-1:

Commenter's opinion regarding the number of light signals being excessive and the suggestion to only add one traffic signal and another "right turn only" exit from the Toscana Village onto southbound Temescal Canyon Road is noted.

The commenter's opinion regarding traffic signals spacing too close and too congested for the shopping center needs is noted. The Traffic Impact Analysis (TIA) prepared for this Project (DEIR Appendix G), shows the proposed traffic controls will alleviate congestion. Only two new traffic signals are proposed at Project buildout (Phase II) in order to attain acceptable levels of service (LOS). LOS, as defined by HCM methodology, includes such factors as freedom to maneuver, traffic interruptions, comfort and convenience, and safety (DEIR, pp. 5.0-169-170). Hence, traffic signals can provide more than just reduced delay and improved traffic flow. A traffic signal at the intersection of Temescal Canyon Road and Project Driveway No. 1 is not required (DEIR, p. 5.1-194). Mitigation measures **MM Trans 4** requires one traffic signal at the intersection of Temescal Canyon Road and Project Driveway No. 2, **MM Trans 5** requires one traffic signal at the intersection of Temescal Canyon Road and Project Driveway No. 3, and **MM Trans 6** requires one traffic signal at the intersection of Temescal Canyon Road and Project Driveway No. 4 (DEIR, p. 5.0-194). The intersections of Temescal Canyon Road and Project Driveway No. 2 and Temescal Canyon Road and Project Driveway No. 3 have unacceptable PM peak hour LOS F without mitigation (for Existing Plus Ambient Plus Project (Phase II) Plus Cumulative (2018) conditions). With the installation of traffic signals at Project Driveways No. 2 and 3, the PM peak hour LOS will improve to C for both intersections (the AM peak hour without the signals is an acceptable C, and improves to a LOS B for both intersections) (TIA, p. 66). The intersection of Temescal Canyon Road and Project Driveway No. 4 (**MM Trans 6**) improves from LOS D to LOS B with installation of the traffic signal.

The Temescal Canyon Road intersection with Project Driveway No. 1 is also stop controlled and includes a raised median on Temescal Canyon Road to prohibit left turns from Driveway No. 1 (DEIR, p. 5.0-185). These mitigation measures are based on the Traffic Impact Analysis (TIA) prepared for this Project (DEIR Appendix G), which was reviewed and approved by County staff and prepared consistent with the County's methodology.

Response to Comment J-2:

Approximately eight (8) existing Southern California Edison (SCE) power poles that are located along Temescal Canyon Road and the project site's frontage will need to be relocated. The power poles will generally remain in the same location within the existing SCE Right-of-Way. The relocation is an adjustment in elevation because the existing elevation (or ground level) where they are located and the proposed elevation after site grading and proposed improvements to the west side of Temescal Canyon Road are different. The elevation adjustments are anticipated to be completed by installing a new pole several feet away from the existing at the new elevation

and then transferring the power lines from the previous pole to the new pole at the proper elevation (DEIR, p. 3.0-4).

The existing SCE power poles support several lines including SCE high voltage 115 kV (kilovolt) transmission lines (upper lines), 12 kV distribution lines (middle lines), and communication lines (lower lines) that go to the Ivyglen Substation located approximately 1-mile northwest of the Project site along Temescal Canyon Road on the west side of I-15. According to the SCE *Power Bulletin*, Volume 13 No. 4 May 2013 (https://www.sce.com/wps/wcm/connect/4a5ed5e3-b0e8-48cf-b7c3-8ba5000188a6/1304_PowerBulletin.pdf?MOD=AJPERES), “With safety, reliability, and affordability in mind, undergrounding transmission lines can cost up to 50 times more than an equivalent overhead line.” “Virtually all 230 kV and above high-voltage electrical transmission lines constructed are proposed as overhead infrastructure for three general reasons: cost, reliability, and environmental considerations.” “SCE’s preference for placing high voltage transmission lines on overhead structures is rooted in our responsibility to safely provide customers with the most affordable, reliable power possible. Underground construction has occurred nationally for lower voltage lines that power homes and businesses, typically, lines 33 kV and below. In rare instances, short portions of 115 kV, 230 kV, and 345 kV lines have been constructed underground.”

Riverside County zoning regulations indicate utilities shall be installed underground except that electrical lines rated at 33 kV or greater may be installed above ground. The proposed Project does not require installation of new electrical lines as it will connect to the existing SCE lines. As SCE’s existing poles support high voltage transmission lines (115 kV) they are not intended to be underground. Only elevation adjustments to approximately eight (8) existing SCE high voltage transmission lines will be made along the Project’s frontage with Temescal Canyon Road as required the Project’s grading activities.

Comment Letter K – Pechanga Cultural Resources, Temecula Band of Luiseño Mission Indians

Comment letter K commences on the next page.



PECHANGA CULTURAL RESOURCES
Temecula Band of Luisefio Mission Indians

Post Office Box 2183 • Temecula, CA 92593
Telephone (951) 770-6300 • Fax (951) 506-9491

Chairperson:
Neal Ibanez

Vice Chairperson:
Briaggett Barcello

Committee Members:
Andrew Masiel, Sr.
Darlene Miranda
Evis Gerber
Richard B. Searance, III
Robert Villalobos

Director:
Gary DuBois

Coordinator:
Paul Macarro

Planning Specialist:
Tuba Ebru Ozdil

July 9, 2018

VIA E-Mail and USPS

Russel Brady
Contractor Planner
County of Riverside
Planning Department
4080 Lemon Street, 12th Floor
P.O. Box 1409
Riverside, CA 92502-1409

Re: Pechanga Tribe Comments on the Draft Environmental Impact Report for Toscana Village at Temescal Valley, Plot Plan No. 26290, Conditional Use Permit No. 3712, General Plan Amendment No. 1146, Change of Zone No. 7859, EIR No. 552; SCH#2017071006

Dear Mr. Brady,

K-1

This comment letter is submitted by the Pechanga Band of Luisefio Indians (hereinafter, "the Tribe"), a federally recognized Indian tribe and sovereign government. The Tribe formally requests, pursuant to Public Resources Code §21092.2, to be notified and involved in the entire CEQA environmental review process for the duration of the above referenced project (the "Project"). If you have not done so already, please add the Tribe to your distribution list(s) for public notices and circulation of all documents, including environmental review documents, archaeological reports, and all documents pertaining to this Project. The Tribe further requests to be directly notified of all public hearings and scheduled approvals concerning this Project. Please also incorporate these comments into the record of approval for this Project. Tribe submits these comments in response to receipt of the May 30, 2018 Draft Environmental Impact Report (EIR) for the above named project.

At this time, we are requesting edits to the language and mitigation measures in the EIR document dated May 2018.

One main objective of CEQA tribal consultation is to identify and address potential adverse impacts of a project to tribal cultural resources (TCRs) (AB 52 Section 1(b)(5) and (b)(7)). Lead agencies are responsible to avoid, when feasible, damaging effects to any tribal cultural resource (TCR). (Cal. Pub Res C 21084.3(a)).

Sacred Is The Duty Trusted Unto Our Care And With Honor We Rise To The Need

Pechanga Comment Letter to the County of Riverside
Re: Pechanga Tribe Comments on the EIR for Toscana Village
July 9, 2018
Page 2

K-1
Cont.

The Pechanga Band is not opposed to this Project; however, we are opposed to any direct, indirect and cumulative impacts this Project will have to tribal cultural resources, including Traditional Cultural Properties (TCPs). The Tribe's primary concerns stem from the proposed impacts on Native American cultural resources since the Project is located within a known TCP. The Tribe is concerned with potential impacts to unique and irreplaceable cultural resources, including village sites, ceremonial areas, cultural items, and features that fall within the TCP. The Tribe is particularly concerned over the proper and lawful treatment of cultural items, Native American human remains, and sacred items likely to be discovered in the course of the construction.

PECHANGA CULTURAL AFFILIATION TO AND EXPERTISE CONCERNING THE PROJECT AREA

K-2

The Project area is part of *'Ataaxum* (Luisefio) traditional territory, as evidenced by the existence of *'Ataaxum* place names, *toota yixelval* (rock art, pictographs, petroglyphs), traditional landscapes, cultural areas, and an extensive Luisefio artifact record in the vicinity of the Project. This culturally sensitive area is affiliated with the Pechanga Band of Luisefio Indians because of the Tribe's cultural ties to this area as well as the close proximity of the Project to the Tribal reservation lands.

The Pechanga Tribe has a specific legal and cultural interest in this Project as the Tribe is culturally affiliated with the geographic area that comprises the Project boundary. The Tribe has been named the Most Likely Descendent (Cal. Pub. Res. C. §5097.98) on Projects in the nearby vicinity of the proposed Project. In addition, because of the Tribe's cultural affiliation with the territory, we possess expertise on the cultural and tribal resources within the Project area and have specific knowledge of cultural resources and places near the proposed Project (Cal Pub. Res C21080.3.1).

EIR IDENTIFICATION ANALYSIS AND MITIGATION FOR CULTURAL RESOURCES AND TRIBAL CULTURAL RESOURCES

K-3

The Toscana Village at Temescal Valley Draft Environmental Impact Report No. 552 ("DEIR"), Tribal Cultural Resources section 5.8 did not identify any cultural resources on the Project property and stated nothing was identified by the tribes. On the contrary, through our consultation and in writing, Pechanga identified that the Project falls within a Traditional Cultural Property. The Tribe appreciates the implementation of the agreed upon conditions of approvals for this project; we presume the conditions of approvals for the project will be also be implemented as a mitigation measures and this should be clarified in the DEIR to avoid future implementation issues. The Project's TCR section identifies the Tribe's concerns and acknowledges that the Project is located within the larger Native American Heritage Commission registered TCP. The conditions of approval that we had agreed upon during our consultation are referenced in the DEIR, but are not placed in the document as mitigation measures to minimize

*Pechanga Cultural Resources • Temecula Band of Luisefio Mission Indians
Post Office Box 2183 • Temecula, CA 92592*

Sacred Is The Duty Trusted Unto Our Care And With Honor We Rise To The Need

Pechanga Comment Letter to the County of Riverside
Re: Pechanga Tribe Comments on the EIR for Toscana Village
July 9, 2018
Page 3

K-3
Cont.

the impacts to the TCP, which would reduce the impacts to less than significant. It is imperative that the DEIR include mitigation measures, with associated conditions of approval matching the mitigation language to avoid future implementation conflicts and ensure enforceability under CEQA.

There are five known village sites located within the TCP boundary, as well as two historic trails, hot and cold springs, and countless other recorded cultural resources. The proposed Project is located along one of the trails, well within a village footprint, and located less than 400 yards away from known human remains. In addition, there are several sacred and ceremonial items identified within a mile radius from the project site. However, as of yet, there have been no contributing features or recorded sites related to the TCP identified within the Project area. Considering the potential for finding the subsurface cultural resources, and overall impacts to the TCP, the Tribe requests that the agreed upon conditions be implemented as mitigation measures to ensure that the Tribal Cultural Resources section is in compliance with the CEQA regulations.

K-4

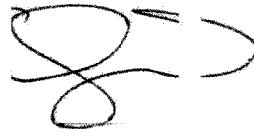
In addition, we request the '*Ataxum and toota yixelval*' to be spelled correctly throughout the document.

K-5

The Tribe requests that the County review and respond to this letter and Attachment I, which contains the Tribe's proposed mitigation measures for Tribal Cultural Resources. The Tribe asserts our edits to the mitigation measures are justified and that they be incorporated into the Final EIR and other applicable documents such as the MMRP.

The Pechanga Tribe looks forward to continuing to work together with the County in protecting the invaluable Pechanga cultural resources found in the project area. Please contact me at 951-770-6313 or eozdil@pechanga-nsn.gov if you have any questions or comments.

Sincerely,


Tuba Ebru Ozdil
Cultural Analyst

enclosures: Attachment I

cc: Heather Thomson, County Archeologist, Riverside County
Gary DuBois, Director, Pechanga Cultural Resources Department
Pechanga Office of the General Counsel

*Pechanga Cultural Resources • Temecula Band of Luiseno Mission Indians
Post Office Box 2183 • Temecula, CA 92592*

Sacred Is The Duty Trusted Unto Our Care And With Honor We Rise To The Need

Pechanga Comment Letter to the County of Riverside
 Re: Pechanga Tribe Comments on the EIR for Toscana Village
 July 9, 2018
 Page 4

ATTACHMENT I

PECHANGA TRIBE REQUESTED AND EDITED MITIGATION MEASURES BASED ON PROJECT CONDITIONS OF APPROVAL FOR TRIBAL CULTURAL RESOURCES

MM TCR 1: If human remains are found on this site, the developer/permit holder or any successor in interest shall comply with State Health and Safety Code Section 7050.5.

MM TCR 2: The developer/permit holder or any successor in interest shall comply with the following for the life of the CUP 03712 permit.

a. If during ground disturbance activities, unanticipated cultural resources* are discovered, the following procedures shall be followed:

b. All ground disturbance activities within 100 feet of the discovered cultural resource shall be halted and the applicant shall call the County Archaeologist immediately upon discovery of the cultural resource. A meeting shall be convened between the developer, the project archaeologist**, the Native American tribal representative (or other appropriate ethnic/cultural group representative), and the County Archaeologist to discuss the significance of the find. At the meeting with the aforementioned parties, a decision is to be made, with the concurrence of the County Archaeologist, as to the appropriate treatment (documentation, recovery, avoidance, etc) for the cultural resource. Further ground disturbance shall not resume within the area of the discovery until the appropriate treatment has been accomplished.

*A cultural resource site is defined, for this condition, as being a feature and/or three or more artifacts in close association with each other, but may include fewer artifacts if the area of the find is determined to be of significance due to sacred or cultural importance.

** If not already employed by the project developer, a County approved archaeologist shall be employed by the project developer to assess the value/importance of the cultural resource, attend the meeting described above, and continue monitoring of all future site grading activities as necessary.

MM TCR 3: Prior to issuance of grading permits, the developer/permit applicant shall enter into a Cultural Resources Treatment and Monitoring agreement with the consulting tribe(s) for a Native American Monitor. The Native American Monitor(s) shall be on-site during all initial ground disturbing activities and excavation of each portion of the project site including clearing, grubbing, tree removals, grading and trenching. In conjunction with the Archaeological Monitor(s), the Native American Monitor(s) shall have the authority to temporarily divert

*Pechanga Cultural Resources • Temecula Band of Luiseno Mission Indians
 Post Office Box 2183 • Temecula, CA 92592*

Sacred Is The Duty Trusted Unto Our Care And With Honor We Rise To The Need

Pechanga Comment Letter to the County of Riverside
 Re: Pechanga Tribe Comments on the EIR for Toscana Village
 July 9, 2018
 Page 5

redirect or halt the ground disturbance activities to allow identification, evaluation, and potential recovery of cultural resources. The develop/permit applicant shall submit a fully executed copy of the agreement to the County Archeologist to ensure compliance with this condition of approval. Upon verification, the Archeologist shall clear this condition. This agreement shall not modify any condition of approval or mitigation measure.

MM TCR 4: Prior to issuance of grading permits: The applicant/developer shall provide evidence to the County of Riverside Planning Department that a County certified professional archaeologist (Project Archaeologist) has been contracted to implement a Cultural Resource Monitoring Program. A Cultural Resource Monitoring Plan shall be developed that addresses the details of all activities and provides procedures that must be followed in order to reduce the impacts to cultural and historic resources to a level that is less than significant as well as address potential impacts to undiscovered buried archaeological resources associated with this project. A fully executed copy of the contract and a wet-signed copy of the Monitoring Plan shall be provided to the County Archaeologist to ensure compliance with this condition of approval. Working directly under the Project Archaeologist, an adequate number of qualified archaeological Monitors shall be present to ensure that all earth moving activities are observed and shall be on-site during all grading activities for areas to be monitored including off-site improvements. Inspections will vary based on the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. The frequency and location of inspections will be determined by the Project Archaeologist.

MM TCR 5: Prior to Grading Permit Final Inspection, the landowner(s) shall relinquish ownership of all cultural resources that are unearthed on the Project property during any ground-disturbing activities, including previous investigations and /or Phase III data recovery. Historic Resources - all historic archaeological materials recovered during the archaeological investigations (this includes collections made during an earlier project, such as testing of archaeological sites that took place years ago), shall be curated at the Western Science Center, a Riverside County curation facility that meets State Resources Department Office of Historic Preservation Guidelines for the Curation of Archaeological Resources ensuring access and use pursuant to the Guidelines. Prehistoric Resources - One of the following treatments shall be applied.

- a. Reburial of the resources on the Project property. The measures of reburial shall include, at least, the following: measures to protect the reburial area from any future impacts. Reburial shall not occur until all required cataloging, analysis and studies have been completed on the cultural resources, with an exception that sacred items, burial goods and Native American human remains are excluded. Any reburial processes shall be culturally appropriate. Listing of contents and location of the reburial shall be included in the confidential Phase IV Report. The Phase IV Report shall be filed with the County under a confidential cover and not subject to a Public Records request.

*Pechanga Cultural Resources • Temecula Band of Luiseño Mission Indians
 Post Office Box 2183 • Temecula, CA 92592*

Sacred Is The Duty Trusted Unto Our Care And With Honor We Rise To The Need

Pechanga Comment Letter to the County of Riverside
Re: Pechanga Tribe Comments on the EIR for Toscana Village
July 9, 2018
Page 6

- b. If reburial is not agreed upon by the Consulting Tribes then the resources shall be curated at a culturally appropriate manner at the Western Science Center, a Riverside County curation facility that meets State Resources Department Office of Historic Preservation Guidelines for the Curation of Archaeological Resources ensuring access and use pursuant to the Guidelines. The collection and associated records shall be transferred, including title, and are to be accompanied by payment of the fees necessary for permanent curation. Evidence of curation in the form of a letter from the curation facility stating that subject archaeological materials have been received and that all fees have been paid, shall be provided by the landowner to the County. There shall be no destructive or invasive testing on sacred items, burial goods and Native American human remains.

MM TCR 6: Prior to Grading Final Inspection, a Phase IV Cultural Resources Monitoring Report shall be submitted that complies with the Riverside County Planning Department's requirements for such reports for all ground disturbing activities associated with this grading permit. The report shall follow the County of Riverside Planning Department Cultural Resources (Archaeological) Investigations Standard Scopes of Work posted on the TLMA website. The report shall include results of any feature relocation or residue analysis required as well as evidence of the required cultural sensitivity training for the construction staff held during the required pre-grade meeting and evidence that any artifacts have been treated in accordance to the procedures stipulated in the Cultural Resources Management Plan.9.

*Pechanga Cultural Resources • Temecula Band of Luiseño Mission Indians
Post Office Box 2183 • Temecula, CA 92592*

Sacred Is The Duty Trusted Unto Our Care And With Honor We Rise To The Need

Response to Comment Letter K – Pechanga Cultural Resources, Temecula Band of Luiseño Mission Indians

Response to Comment K-1:

The County of Riverside conducted and concluded consultation with the Pechanga Band consistent with and pursuant to AB 52. As outlined in the DEIR (p. 5.0-196), in consultation with the Pechanga Band of Luiseño Indians (Pechanga Tribe), the Pechanga Tribe asserts that the proposed Project area is in a Traditional Cultural Property (TCP) and this culturally sensitive area is affiliated with the Pechanga Temecula Band of Luiseño Indians because of the tribe's cultural ties to this area.

During consultation with the Pechanga Tribe, no specific place name or definition of a geographic area was identified for the Traditional Cultural Property. Although there are several large villages complexes in the area, none are present within the current project area. Although there is rock art in the vicinity, there is none present within the project area. The project area is within the limits of a larger TCP identified by the Pechanga Tribe. The Pechanga Tribe provided no information that documents the site contains Tribal Cultural Resources nor that any would be impacted by the project. Therefore, as no potential impacts to Tribal Cultural Resources were identified, no mitigation is required to offset impacts.

Response to Comment K-2:

Comment noted. As outlined in Response to Comment K-1 above, the DEIR acknowledges the Pechanga Tribe's assertion that the Project site is within a culturally sensitive area affiliated with the Pechanga Tribe. The Pechanga Tribe is a co-Most Likely Descendent in Riverside County.

Response to Comment K-3:

As outlined in Response to Comment K-1 above, during the County's consultation with the Pechanga Tribe, no information that documents the site contains Tribal Cultural Resources nor that any would be impacted by the project was provided. Therefore, as no potential impacts to Tribal Cultural Resources were identified, no mitigation is required to offset impacts.

As outlined in the DEIR (pp. 5.0-200 – 5.0-202), the County provided the Pechanga Tribe with the revised and final conditions of approval and the Pechanga Tribe responded that with inclusion of the conditions provided they consider AB 52 consultation complete. This excerpt from the DEIR and the conditions or approval are as follows:

The County had an additional discussion with the Pechanga Tribe on April 18, 2018 and provided revised and final conditions of approval to the Pechanga Tribe. On April 18, 2018 The Pechanga Tribe responded with an email indicating with the inclusion of the conditions provided they consider AB 52 consultation complete.

The County is requiring the following Conditions of Approval (COA) be implemented by the applicant for the Project:

- PLANNING-CUL. 1: If human remains are found on this site, the developer/permit holder or any successor in interest shall comply with State Health and Safety Code Section 7050.5.
- PLANNING-CUL. 2: The developer/permit holder or any successor in interest shall comply with the following for the life of the CUP 03712 permit.
 - a. If during ground disturbance activities, unanticipated cultural resources* are discovered, the following procedures shall be followed:
 - b. All ground disturbance activities within 100 feet of the discovered cultural resource shall be halted and the applicant shall call the County Archaeologist immediately upon discovery of the cultural resource. A meeting shall be convened between the developer, the project archaeologist**, the Native American tribal representative (or other appropriate ethnic/cultural group representative), and the County Archaeologist to discuss the significance of the find. At the meeting with the aforementioned parties, a decision is to be made, with the concurrence of the County Archaeologist, as to the appropriate treatment (documentation, recovery, avoidance, etc.) for the cultural resource. Further ground disturbance shall not resume within the area of the discovery until the appropriate treatment has been accomplished. *A cultural resource site is defined, for this condition, as being a feature and/or three or more artifacts in close association with each other, but may include fewer artifacts if the area of the find is determined to be of significance due to sacred or cultural importance. ** If not already employed by the project developer, a County approved archaeologist shall be employed by the project developer to assess the value/importance of the cultural resource, attend the meeting described above, and continue monitoring of all future site grading activities as necessary.
- 60. PLANNING-CUL.1: Prior to issuance of grading permits, the developer/permit applicant shall enter into an agreement with the consulting tribe(s) for a Native American Monitor. The Native American Monitor(s) shall be on-site during all initial ground disturbing activities and excavation of each portion of the project site including clearing, grubbing, tree removals, grading and trenching. In conjunction with the Archaeological Monitor(s), the Native American Monitor(s) shall have the authority to temporarily divert, redirect or halt the ground disturbance activities to allow identification, evaluation, and potential recovery of cultural resources. The develop/permit applicant shall submit a fully executed copy of the agreement to the County Archeologist to ensure compliance with this condition of approval. Upon verification, the Archaeologist shall clear this condition. This agreement shall not modify any condition of approval or mitigation measure.
- 60. PLANNING-CUL. 2: Prior to issuance of grading permits: The applicant/developer shall provide evidence to the County of Riverside Planning Department that a County certified professional archaeologist (Project Archaeologist) has been contracted to implement a Cultural Resource Monitoring Program. A Cultural Resource Monitoring Plan shall be developed that addresses the details of all activities and provides procedures that must be followed in order to reduce the impacts to cultural and historic resources to a level that is less than significant as well as address potential impacts to undiscovered buried archaeological resources associated with this project. A fully

executed copy of the contract and a wet-signed copy of the Monitoring Plan shall be provided to the County Archaeologist to ensure compliance with this condition of approval. Working directly under the Project Archaeologist, an adequate number of qualified Archaeological Monitors shall be present to ensure that all earth moving activities are observed and shall be on-site during all grading activities for areas to be monitored including off-site improvements. Inspections will vary based on the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. The frequency and location of inspections will be determined by the Project Archaeologist.

- 70. PLANNING-CUL. 1: Prior to Grading Permit Final Inspection, the landowner(s) shall relinquish ownership of all cultural resources that are unearthed on the Project property during any ground-disturbing activities, including previous investigations and /or Phase III data recovery. Historic Resources – all historic archaeological materials recovered during the archaeological investigations (this includes collections made during an earlier project, such as testing of archaeological sites that took place years ago), shall be curated at the Western Science Center, a Riverside County curation facility that meets State Resources Department Office of Historic Preservation Guidelines for the Curation of Archaeological Resources ensuring access and use pursuant to the Guidelines. Prehistoric Resources – One of the following treatments shall be applied.
 - a. Reburial of the resources on the Project property. The measures of reburial shall include, at least, the following: measures to protect the reburial area from any future impacts. Reburial shall not occur until all required cataloging, analysis and studies have been completed on the cultural resources, with an exception that sacred items, burial goods and Native American human remains are excluded. Any reburial processes shall be culturally appropriate. Listing of contents and location of the reburial shall be included in the confidential Phase IV Report. The Phase IV Report shall be filed with the County under a confidential cover and not subject to a Public Records request.
 - b. If reburial is not agreed upon by the Consulting Tribes then the resources shall be curated at a culturally appropriate manner at the Western Science Center, a Riverside County curation facility that meets State Resources Department Office of Historic Preservation Guidelines for the Curation of Archaeological Resources ensuring access and use pursuant to the Guidelines. The collection and associated records shall be transferred, including title, and are to be accompanied by payment of the fees necessary for permanent curation. Evidence of curation in the form of a letter from the curation facility stating that subject archaeological materials have been received and that all fees have been paid, shall be provided by the landowner to the County. There shall be no destructive or invasive testing on sacred items, burial good and Native American human remains.
- 70 PLANNING-CUL. 2: Prior to Grading Final Inspection, a Phase IV Cultural Resources Monitoring Report shall be submitted that complies with the Riverside County Planning Department's requirements for such reports for all ground disturbing activities associated with this grading permit. The report shall follow the County of Riverside Planning Department Cultural Resources (Archaeological) Investigations

Standard Scopes of Work posted on the TLMA website. The report shall include results of any feature relocation or residue analysis require as well as evidence of the required cultural sensitivity training for the construction staff held during the required pre-grade meeting and evidence that any artifacts have been treated in accordance to the procedures stipulated in the Cultural Resources Management Plan.

The County's standard Conditions of Approval outlined above will be required and no additional mitigation measures are warranted. No Tribal Cultural Resources were identified so there are no potentially significant impacts to mitigate. Potential adverse impacts to Tribal Cultural Resources are less than significant and no mitigation measures are required.

Response to Comment K-4:

The terms '*Atáaxum*' and *tóota yixélval* were inadvertently miss-spelled. Therefore, Section 5.8.1, page 5.0-196 of the DEIR will be corrected as shown below:

In consultation with the Pechanga Band of Luiseño Indians (Pechanga Tribe), the Pechanga Tribe asserts that the proposed Project area is in an area associated with the '*Atáaxum*' ~~'Atdaxum~~ Luiseño as evidenced by the existence of '*Atáaxum*' ~~'Atdaxum~~ place names, a Traditional Cultural Property (TCP), several large village complexes, *tóota yixélval* ~~toota-yixelval~~ (rock art, pictographs, petroglyphs), an extensive artifact record, and known human remains in the vicinity of the Project. This culturally sensitive area is affiliated with the Pechanga Temecula Band of Luiseño Indians because of the tribe's cultural ties to this area.

And Section 5.8.6, page 5.0-200 of the DEIR will be corrected as shown below:

The County received a letter from the Pechanga Tribe dated August 2, 2017 where the Pechanga Tribe requests the reopening of AB52 consultation with the County to discuss how the DEIR will address tribal cultural resources and further requests to be involved in reviewing drafts of the language for the tribal cultural resource section of the DEIR prior to its release for public review. The Pechanga Tribe asserts that the proposed Project area is in an area associated with the '*Atáaxum*' ~~'Atdaxum~~ Luiseño as evidenced by the existence of '*Atáaxum*' ~~'Atdaxum~~ place names, several large village complexes, *tóota yixélval* ~~toota-yixelval~~ (rock art, pictographs, petroglyphs), an extensive artifact record, and known human remains in the vicinity of the Project. The project area also falls within the limits of a large Traditional Cultural Property (TCP). This culturally sensitive area is affiliated with the Pechanga Temecula Band of Luiseño Indians because of the tribe's cultural ties to this area. In the letter from the Pechanga Tribe, the Pechanga Tribe lists relevant regulations for the County to ensure compliance with and then discusses potential impacts to tribal cultural resources and recommends mitigation measures should the project uncover potential tribal cultural resources.

Response to Comment K-5:

As outlined in Response to Comment K-3 above, the County's standard Conditions of Approval outlined above will be required and no additional mitigation measures are warranted. Attachment I to the Pechanga Tribe's letter includes the County's standard Conditions of Approval with minor editorial changes requested but referring to as mitigation measures. No Tribal Cultural Resources were identified by the Pechanga Tribe during consultation so there are no potentially significant impacts to mitigate. Potential adverse impacts to Tribal Cultural Resources are less than significant and no mitigation measures are required.

In addition, as outlined in the DEIR (pp. 5.0-200 – 5.0-202) and in Response to Comment K-3 above, the County provided the Pechanga Tribe with the revised and final conditions of approval and the Pechanga Tribe responded that with inclusion of the conditions provided they consider AB 52 consultation complete. The County will require the Standard Conditions of Approval for the proposed Project as outlined above and will not make further changes to these conditions.

Comment Letter L – Sincich, Jerry

Comment letter L commences on the next page.

July 7, 2018

Russell Brady, Project Planner
Riverside County Planning Department
4080 Lemon Street, 12th Floor
Riverside, CA 92501

Re: Toscana Village at Temescal Valley Draft Environmental Impact Report No. 552 & Technical Appendices SCH# 2017071006

Mr. Brady,

- The following are the recommended revisions to the Toscana Village Draft Environmental Impact Report.
- L-1 { 5.7.4 Project Design Considerations
- Install only one stop sign control signal at Driveway 3. At Driveway 3 add one eastbound right turn lane at the Temescal Canyon.
 - At Driveways 1, 2, 4 utilize only stop signs to control traffic.
 - Utilizing only one stop sign control signal at Driveway 3 will eliminate: 1) traffic congestion during the peak morning and evening traffic hours; 2) minimize traffic congestion due to the tractor trailer trucks, cement trucks and asphalt truck hauling material from mining, concrete and asphalt operations currently using Temescal Canyon Road; 3) eliminate traffic congestion on the vehicle corridor traveling northbound along Temescal Canyon Road from the Indian Truck Trail/Temescal Canyon Road intersection; 4) reduce greenhouse gas emissions from cars and trucks stuck in traffic.
- L-2 { Mass Transit
- Bus Stop/Bus Turnout needs to be included along Temescal Canyon Road. In addition, public parking spaces and a travel route need to be developed to support of a RTA Commuter Link bus stop at the Indian Truck Trail/Interstate 15 Freeway interchange. The RTA Commuter Link currently provides commuter bus service from Temecula to the Corona Transit Center along the Interstate 15 Freeway.
- L-3 { Electrical Transmission Lines
- Southern California Edison transmission lines and structures (poles/lines) currently running along Temescal Canyon Road need to be placed underground: 1) to eliminate power outages due to vehicle accidents which damage power lines and poles; 2) to eliminate damage to power lines from hillside wildfires on Temescal Canyon Road across the street from Toscana Villages; 3) to be consistent with the surrounding residential communities and Sycamore Creek shopping center.
- L-4 { Building Site Plan
- Building 5 should be moved from its current location (adjacent to Temescal Canyon Road) to the west so it is adjacent to the Interstate 15 freeway.

L-5 { The above revisions to the Toscana Villages Environmental Impact Report will improve the project and the Temescal Valley now and in the future.

Regards,

Jerry Sincich

Response to Comment Letter L – Sincich, Jerry

Response to Comment L-1:

The Project's design provides stop sign control at all four Project Driveways until signal warrants are met (DEIR, p. 5.0-185). Only three new traffic signals are proposed at Project buildout (Phase II) at Driveway No. 2, No. 3, and No. 4 in order to attain acceptable levels of service (LOS). This is only two additional traffic signal than recommended in the comment.

The commenter's opinion regarding traffic signals spacing too close and too congested for the shopping center needs is noted. The Traffic Impact Analysis (TIA) prepared for this Project (DEIR Appendix G), shows the proposed traffic controls will alleviate congestion. Only two new traffic signals are proposed at Project buildout (Phase II) in order to attain acceptable levels of service (LOS). LOS, as defined by HCM methodology, includes such factors as freedom to maneuver, traffic interruptions, comfort and convenience, and safety (DEIR, pp. 5.0-169-170). Hence, traffic signals can provide more than just reduced delay and improved traffic flow. A traffic signal at the intersection of Temescal Canyon Road and Project Driveway No. 1 is not required (DEIR, p. 5.1-194). Mitigation measures **MM Trans 4** requires one traffic signal at the intersection of Temescal Canyon Road and Project Driveway No. 2, **MM Trans 5** requires one traffic signal at the intersection of Temescal Canyon Road and Project Driveway No. 3, and **MM Trans 6** requires one traffic signal at the intersection of Temescal Canyon Road and Project Driveway No. 4 (DEIR, p. 5.0-194). The intersections of Temescal Canyon Road and Project Driveway No. 2 and Temescal Canyon Road and Project Driveway No. 3 have unacceptable PM peak hour LOS F without mitigation (for Existing Plus Ambient Plus Project (Phase II) Plus Cumulative (2018) conditions). With the installation of traffic signals at Project Driveways No. 2 and 3, the PM peak hour LOS will improve to C for both intersections (the AM peak hour without the signals is an acceptable C, and improves to a LOS B for both intersections) (TIA, p. 66). The intersection of Temescal Canyon Road and Project Driveway No. 4 (**MM Trans 6**) improves from LOS D to LOS B with installation of the traffic signal.

Additionally, **MM AQ 2** requires the Project to synchronize the Project's traffic signals at Project driveways and the intersection of Temescal Canyon Road and Indian Truck Trail which improves traffic flow by reducing acceleration/deceleration. A traffic signal organizes the traffic at the intersection and allows each leg of the intersection a certain amount of time to complete their movement. While this may result in a little more delay for some legs of the intersection, the signal light ensures that all turning movements get a chance to occur which reduce the amount of backup associated with vehicles waiting to make a turn (DEIR, p. 5.0-189). Traffic signals are thus often utilized to improve traffic conditions and LOS at intersections. LOS, as defined HCM methodology, includes such factors as freedom to maneuver, traffic interruptions, comfort and convenience, and safety (DEIR, pp. 5.0-169-170). Hence, traffic signals can provide more than just reduced delay and improved traffic flow.

Response to Comment L-2:

Bus service in the Project area is provided by Riverside Transit Authority (RTA). Currently Route 7 services the area, but there are no direct routes through Temescal Canyon Road (TIA, p. 18; DEIR, p. 5.0-162.)

The Project applicant communicated with RTA on July 18, 2018 and identified the applicant will continue to coordinate with RTA as final design of the street is being completed with the intent of being compatible with RTA needs should a future route and/or stops and turn outs be needed. As such, if RTA bus service is extended to the Project site, the right-of-way along Temescal Canyon Road will be sufficient for bus stops/bus turn-outs.

Response to Comment L-3:

Approximately eight (8) existing Southern California Edison (SCE) power poles that are located along Temescal Canyon Road and the project site's frontage will need to be relocated. The power poles will generally remain in the same location within the existing SCE Right-of-Way. The relocation is an adjustment in elevation because the existing elevation (or ground level) where they are located and the proposed elevation after site grading and proposed improvements to the west side of Temescal Canyon Road are different. The elevation adjustments are anticipated to be completed by installing a new pole several feet away from the existing at the new elevation and then transferring the power lines from the previous pole to the new pole at the proper elevation (DEIR, p. 3.0-4).

The existing SCE power poles support several lines including SCE high voltage 115 kV (kilovolt) transmission lines (upper lines), 12 kV distribution lines (middle lines), and communication lines (lower lines) that go to the Ivyglen Substation located approximately 1-mile northwest of the Project site along Temescal Canyon Road on the west side of I-15. According to the SCE *Power Bulletin*, Volume 13 No. 4 May 2013 (https://www.sce.com/wps/wcm/connect/4a5ed5e3-b0e8-48cf-b7c3-8ba5000188a6/1304_PowerBulletin.pdf?MOD=AJPERES), "With safety, reliability, and affordability in mind, undergrounding transmission lines can cost up to 50 times more than an equivalent overhead line." "Virtually all 230 kV and above high-voltage electrical transmission lines constructed are proposed as overhead infrastructure for three general reasons: cost, reliability, and environmental considerations." "SCE's preference for placing high voltage transmission lines on overhead structures is rooted in our responsibility to safely provide customers with the most affordable, reliable power possible. Underground construction has occurred nationally for lower voltage lines that power homes and businesses, typically, lines 33 kV and below. In rare instances, short portions of 115 kV, 230 kV, and 345 kV lines have been constructed underground."

Riverside County zoning regulations indicate utilities shall be installed underground except that electrical lines rated at 33 kV or greater may be installed above ground. The proposed Project does not require installation of new electrical lines as it will connect to the existing SCE lines. As SCE's existing poles support high voltage transmission lines (115 kV) they are not intended to be underground. Only elevation adjustments to approximately eight (8) existing SCE high voltage

transmission lines will be made along the Project's frontage with Temescal Canyon Road as required the Project's grading activities.

Response to Comment L-4:

Initial site plans of the proposed Project had most of the buildings on the eastern edge of the property adjacent to Temescal Canyon Road. The site plan has been revised numerous times, and largely from input from the community, to move buildings to the western side of the property and adjacent to I-15. In the current site plan, Building 5 has also been moved to the western side of the property adjacent to I-15. The current site plan is included as Attachment C to this FEIR.

Response to Comment L-5:

Refer to Responses to Comments L-1 through L-4 above.

Comment Letter M – Terramor

Comment letter M commences on the next page.



TERRAMOR

4590 MacArthur Blvd., Suite 600
Newport Beach, CA 92660

Tel. 949-748-6714
Fax. 949-748-8488

July 9, 2018

Mr. Russell Brady
Riverside County Planning Department
4080 Lemon Street, 12th Floor
Riverside, CA 92501
Telephone: (951) 956-3026
E-mail: rbradv@rivco.org

RE: Comments on Draft Environmental Impact Report (EIR) No. 552 (SCH# 2017071006) for the Toscana Village at Temescal Valley project (GPA 1146, CZ 7859, PP 26290, and CUP 3712)

Mr. Brady:

On behalf of Forestar Toscana Development Company (hereafter "Forestar Toscana"), the master developer of the adjacent 961-acre Terramor community (Specific Plan (SP) No. 327A1), and other Terramor community stakeholders, including but not limited to its merchant builders, property owners, and residents, I submit these comments on Draft Environmental Impact Report (DEIR) No. 552 (SCH#2017071006).

The proposed Toscana Village at Temescal Valley project (hereafter, "proposed project") which is the subject of DEIR 552 is located adjacent to and south/southwest of Temescal Canyon Road. The Terramor community is located on the north/northeast side of Temescal Canyon Road. The Terramor community is currently under construction, with over 240 residential building permits issued, over 150 homes sold, and approximately 90 homes occupied to-date. When fully built out in accordance with SP No. 327A1, Terramor will be comprised of up to 1,443 residences, 21.4 acres of parks, supporting infrastructure, and 614.2 acres of open space. Refer to approved SP No. 327A1 for more information.

Forestar Toscana and other stakeholders of the Terramor community have a number of concerns about the proposed project's impacts on the environment. Our principal concerns are listed below, followed by more detailed explanations of these concerns.

- 1) DEIR No. 552 does not adequately consider SP No. 327A1 (Terramor) in its Cumulative Projects Study Area,
- 2) DEIR No. 552 does not study the proposed project's potentially significant aesthetic impacts along Temescal Canyon Road,
- 3) DEIR No. 552 does not adequately consider the proposed project's land use compatibility with the surrounding planned and existing land uses, including that of the Terramor community; and
- 4) DEIR No. 552 does not study the proposed project's potential traffic impacts to several key intersections along Temescal Canyon Road.

M-1



TERRAMOR

4590 MacArthur Blvd., Suite 600
Newport Beach, CA 92660

Tel. 949-748-6714
Fax. 949-748-8488

M-2

1. DEIR No. 552 does not adequately consider SP No. 327A1 (Terramor) in the Cumulative Projects Study Area.

DEIR No. 552 does not appear to have included all of the approved residential units within SP No. 327A1 (the Terramor community) in the DEIR's Cumulative Projects Study Area. SP 327A1 was approved by Riverside County in 2014, and authorizes up to 1,443 residential units, 21.4 acres of parks, supporting infrastructure, and 614.2 acres of open space. The Terramor community's current entitlements include SP 327A1, TR 36643, TR 36593, TR 36825, and TR 36826, yet only TR 36953 is listed in the DEIR's Table 6.0-A, Cumulative Project Development. Further, when the proposed project's Traffic Impact Analysis (TIA) traffic counts were collected in 2016, no residential units were yet built or occupied in the Terramor community, and therefore, none of Terramor's traffic would have been captured under the traffic counts, meaning that all 1,443 future homes and other uses should have been considered as a cumulative project.

We therefore request that the response to this comment and the Final EIR include revisions to the DEIR and all associated technical studies related to cumulative effects to account for all of the appropriate aspects of the approved Terramor project.

M-3

2. It appears that the proposed project would have a potentially significant aesthetic impact along Temescal Canyon Road that was not studied.

The DEIR does not include a detailed evaluation of the proposed project's potential aesthetic impacts because the environmental topic of Aesthetics was "scoped out" of DEIR No. 552 during the preparation of the Initial Study. The analysis in EA 42664, pages 14 and 15, (see DEIR Technical Appendix A), was used to determine that impacts to scenic resources did not warrant analysis in the DEIR, yet this analysis only considers views from the 1-15 freeway and provides no analysis of public views from Temescal Canyon Road.

Forestar Toscana and other stakeholders of the Terramor community are concerned that the combination of the large proposed retaining wall along Temescal Canyon Road and the location of Building #5 would have a significant aesthetic impact to scenic views and compatibility with the aesthetic qualities of public views from Temescal Canyon Road.

We therefore request that the response to this comment and the Final EIR include: a) an analysis of the project's impact to scenic views visible from Temescal Canyon Road; and b) an analysis of the aesthetic qualities of the proposed project visible to the public from Temescal Canyon Road. We also request an alternative analysis for the position of Building No. 5 further into the project site and closer to the 1-15 freeway. The analysis of the project as proposed and the analysis of the relocated Building #5 alternative should each include a legible site plan, a legible grading plan, and a detailed description of Building No. 5's physical relationship to Temescal Canyon Road, including grades, height, length, width, setbacks, bulk and scale, as well as any necessary retaining walls.



4590 MacArthur Blvd., Suite 600
Newport Beach, CA 92660

Tel. 949-748-6714
Fax 949-748-8488

- M-4** { **3. The proposed project could have a potentially significant land use compatibility impact that was not studied.**
- DEIR Section 3.3, Project Objectives, states that an objective of the project is to "create a visually attractive development through consistent application of architectural elements and landscape standards that will create a community atmosphere, reinforce the community character of Temescal Valley utilizing specific quality materials and Tuscan theme styles." However, there is no information provided in the DEIR that describes the architectural character of the buildings proposed in Phase I by Plot Plan No. 26290, nor are there any assurances that the buildings that would be constructed in Phase II would adhere to the same architectural style and standards. We request that the response to this comment and the Final EIR include the project's proposed architectural elevations, landscaping plan, and a detailed description of the proposed architecture for each building.
- M-5** { **4) The DEIR and its Traffic Impact Analysis appears to not have studied several key intersections along Temescal Canyon Road that have the potential to be significantly impacted.**
- DEIR No. 552 does not appear to have studied the proposed project's potential traffic impacts to the intersections of Temescal Canyon Road/Terramor Drive (formally named Toscana Drive) and Temescal Canyon Road/Temesca Hills Drive. These are the two main roads into the Terramor community, the locations of which were established in 2006, both of which were constructed in 2016.
- We request that the response to this comment and the Final EIR include a quantitative evaluation of the project's impact at these two intersections for each traffic scenario studied in the project's Traffic Impact Analysis report, with traffic volumes and LOS reported, as well as a determination of significance and, if warranted, mitigation.
- M-6** { The DEIR (pp. 1.0-4, 3.0-4 and Figure 3.0-8) indicates that the proposed project will require the installation of off-site water and sewer lines in Temescal Canyon Road, extending from the project site to Terramor Drive. We request that the response to this comment and the Final EIR disclose whether temporary lane closures would be needed for these utility installations. If temporary lane closures would be needed, we request that the response to this comment and the Final EIR include an analysis of the short-term traffic impacts resulting from the lane closure activity, and that mitigation be applied to reduce these temporary impacts to less than significant levels.
- M-7** { **Other Comments**
- In addition to the four primary concerns listed above, Forestar Toscana and other stakeholders of the Terramor community have additional concerns with the content of DEIR No. 552 and its analysis methodologies. We reserve the right to provide additional comments on the Draft EIR, Final EIR and other components of the CEQA compliance process as this project moves forward in the County's review and deliberation process.



4590 MacArthur Blvd., Suite 600
Newport Beach, CA 92660

Tel: 949-748-6714
Fax: 949-748-8488

M-7
Cont.

Please include Forestar Toscana on the public notice list for this project. Direct all correspondence specifically to:

Andrew Petitjean, Vice President Community Development
Forestar Toscana Development Company
4590 MacArthur Boulevard, Suite 600
Newport Beach, CA 92660
andy@forestartoscana.com

Thank you for the consideration of our comments.

Sincerely,

Stephen C. Cameron, President
Forestar Toscana Development Company

Response to Comment Letter M – Terramor

Response to Comment M-1:

This is an introductory comment that describes briefly the Terramor community, its location relative to the proposed Project and the status of construction of the Terramor community and Specific Plan 327. This comment summarizes their main list of concerns, #1-4, which are explained in more detail as Comments M-2 through M-6, with responses to those outlined in Response to Comments M-2 through M-6 below.

Response to Comment M-2:

Consistent with standard Riverside County methodology for Traffic Impact Analysis, the cumulative list was developed at the initiation of the TIA. The cumulative analysis is to include reasonably foreseeable projects. The cumulative project list for the proposed Project includes list of projects that are on file with the County and that are anticipated to be built and operating (i.e. occupied residences that are generating traffic trips) at the time the proposed Project would be built out and that would affect the same intersections and roadway segments as the proposed Project. Based on these parameters it was determined that TR 36593 of the larger Terramor development (Specific Plan No. 327) should be included in the cumulative project list. As shown in the DEIR the cumulative project list included TR 36593 with a total of 610 dwelling units (DEIR, p. 6.0-2, Table 6.0-A: Cumulative Project Developments). This was considered a reasonable and conservative estimate of the number of dwelling units in the Terramor community that would be occupied and generating traffic trips at the time of build out of the proposed Project.

The commenter indicates in Comment M-1 that “The Terramor community is currently under construction, with over 240 residential building permits issued, over 150 homes sold and approximately 90 homes occupied to-date”. Therefore, at the time of the EIR analysis approximately 90-homes are currently occupied and generating traffic trips in the project area that could affect some of the same intersections and roadway segments as the proposed Project. This affirms the TIA analysis assumption that inclusion of TR 36593 with a total of 610 dwelling units was considered a reasonable and conservative estimate of the number of dwelling units in the Terramor community that would be occupied and generating traffic trips at the time of build out of the proposed Project. The current total of approximately 90 occupied homes is less than half of the currently issued building permits. Even if the number of building permits issued for the Terramor community doubled over the next couple of years, at 480 dwelling units, and was entirely occupied and generating traffic trips, this would still be significantly lower than the dwelling units assumed in the cumulative project list for the traffic analysis. Including all of the dwelling units in the entire Terramor development (Specific Plan No. 327) in the cumulative analysis would overestimate the number of total occupied units at the time the proposed Project is operational. Therefore, the cumulative project list for the traffic analysis is considered reasonable and conservative, including the Terramor community’s contribution of traffic, and there is no need to re-do the traffic analysis or other technical studies that are based on data generated in the TIA. In addition, future Traffic Impact Analyses (TIAs) would be required for future phases of the

proposed Project in which the cumulative analysis would include subsequent subdivision applications of the Terramor community that are on file at the County.

Response to Comment M-3:

The Commenter asserts that the DEIR does not include a detailed evaluation of the proposed project's potential aesthetic impacts because the environmental topic of Aesthetics was "scoped out" of DEIR No. 552. As outlined in the CEQA Guidelines, Article 9, Contents of Environmental Impact Reports, Sections 15120 to 15132, Section 15128, Effects Not Found To Be Significant,

An EIR shall contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR. Such a statement may be contained in an attached copy of an Initial Study.

Section 4.0, Environmental Effects Found Not to be Significant of the DEIR (DEIR, p.4.0-1) states:

4.0 Environmental Effects Found Not to be Significant

The California environmental Quality Act (CEQA) provides that a DEIR shall focus on all potentially significant effects created by the project onto the environment, discussing the effects with emphasis in proportion to their severity and probability of occurrence. Effects dismissed in an Environmental Assessment Form: Initial Study as insignificant and unlikely to occur need not be discussed further in the DEIR unless information inconsistent with the finding in the Initial Study is subsequently received.

4.1 Effects Found not to be Significant During Preparation of the NOP

Section 21100(c) of the Public Resources Code states that an EIR shall contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore, not discussed in detail in the EIR. Section 15128 of the *CEQA Guidelines* adds, "Such a statement may be contained in an attached copy of an Initial Study." The Environmental Assessment Form: Initial Study that was prepared for the proposed Project is included in Appendix A. Comment letters received in response to the NOP and notes of comments received at the scoping meeting are also contained in Appendix A. The Environmental Assessment Form: Initial Study was prepared to evaluate the Project's potential to impact the environment. The Environmental Assessment Form: Initial Study includes an analysis for the environmental issues and thresholds that the proposed Project was determined to have no impact, a less than significant impact, or less than significant impact with mitigation incorporated. The following environmental topics and thresholds were determined not to be significant and therefore, will not be discussed in the EIR:

4.1.1 Aesthetics

- Have a substantial effect upon a scenic highway corridor within which it is located?

- Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings and unique or landmark features; obstruct any prominent scenic vista or view open to the public; or result in the creation of an aesthetically offensive site open to public view?
- Interfere with the nighttime use of the Mt. Palomar Observatory, as protected through Riverside County Ordinance No. 655?
- Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?
- Expose residential property to unacceptable light levels?

As such, the DEIR for the proposed Project does contain an analysis of potential Aesthetic impacts, which are summarized in Section 4.0 of the DEIR, and a detailed analysis included in Appendix A IS/NOP of the DEIR, in compliance with the CEQA Guidelines. The IS/NOP, Appendix A of the DEIR (pages 14-16), includes an analysis of aesthetics and it was determined that potential impacts from the proposed Project were determined to be less than significant. There were no comment letters received in response to the IS/NOP that asserted otherwise.

As outlined in the IS/NOP (pages 14-16), views from the I-15 freeway in the project area include generally undeveloped hillsides of the Lake Mathews Estelle Mountains to the northeast and east and the hillsides of the Santa Ana Mountains to the west and northwest. Temescal Creek meanders through the canyon on the east side of the freeway and is generally located at a lower elevation than the freeway. The project will not substantially obstruct views of the surrounding hillsides or of Temescal Creek. The two-story office buildings are the tallest proposed buildings and will not exceed 50 feet in height, which would not significantly obstruct views of the hillsides east of the project site from the I-15 freeway. The proposed project site would not substantially damage scenic resources including, but not limited to, trees, rock outcroppings and unique or landmark features; obstruct any prominent scenic vista or view open to the public; or result in the creation of an aesthetically offensive site open to the public view.

Initial site plans of the proposed Project had most of the buildings on the eastern edge of the property adjacent to Temescal Canyon Road. The site plan has been revised numerous times, and largely from input from the community including representatives from Terramor, to move buildings to the western side of the property and adjacent to I-15. In the current site plan, Building 5 has also been moved to the western side of the property adjacent to I-15. The current site plan is included as Attachment C to this FEIR.

The project applicant has met with Terramor representatives and the final landscaping plan used for that development was provided to the project applicant. The applicant intends to incorporate most, if not all, of the design guidelines and plant palette used for the Terramor development. Therefore, the proposed Project's landscaping will be complimentary to that of Terramor's and will have an aesthetically positive effect as the landscaping will be cohesive between the two developments.

Response to Comment M-4:

The DEIR included a thorough and detailed analysis of potential impacts related to land use including compatibility with existing and surrounding land uses and zoning that are of particular concern related to land use compatibility rather than compatibility of design themes (refer to Section 5.5 Land Use and Planning of the DEIR, pp. 5.0-113 – 5.0-126). Regardless, as outlined in the Project Objectives (DEIR, p. 3.0-5), the proposed Project, including Phase I and II, will have a consistent application of architectural elements and landscape standards that will create a community atmosphere, reinforce the community character of Temescal Valley utilizing specific quality materials and Tuscan theme styles. The architectural elevations are included as Attachment D to this FEIR and the landscape plans are included as Attachment E to demonstrate the quality architecture and landscaping that is a part of the proposed Project.

Response to Comment M-5:

Intersections studied in the Project's Traffic Impact Analysis (TIA) (DEIR Appendix G) were selected based on standard Riverside County methodology, per the Riverside County Transportation Department Traffic Impact Analysis Preparation Guide. This methodology requires that the minimum study area include any intersections of "Collector" or higher classification street of General Plan roads, at which the proposed Project will add 50 or more peak hour trips (DEIR, pp. 5.0-162 – 163; TIA, p. 2). As Terramor Drive and Temescal Hills Drive are not identified as a "Collector" or higher classification street in the County's General Plan Circulation Element, they were not included in the TIA study intersections. The intersections studied in the Project's TIA meet those criteria and were approved by the Riverside County Transportation Department in the TIA Scoping Agreement. This protocol is typical for all projects in Riverside County, and thus it is expected that the intersections mentioned by the Commenter (Temescal Canyon Road/Terramor Drive and Temescal Canyon Road/Temescal Hills Drive) would have been already analyzed for the Terramor Community project as they serve as that project's own access points or driveways off of Temescal Canyon Road.

Response to Comment M-6:

It is not known at this time if lane closures will be necessary for utility installation; however, the Project includes mitigation measure **MM Trans 1**, which addresses impacts related to any temporary road closures during Project construction (DEIR, p. 5.0-194). Thus, temporary road closures during Project construction (which includes the installation of Project utilities) have already been adequately addressed in the DEIR.

Response to Comment M-7:

The four key concerns are referenced again in this comment. Specific responses to these concerns/comments are outlined above in Response to Comments M-2 through M-6. The County acknowledges that there are additional opportunities for the public to comment on the project including at future Planning Commission and Board of Supervisors meetings. The County appreciates Terramor representative's review of the Draft EIR and participation in the CEQA

process. The County will continue to notice all public meetings/hearing notices and other CEQA documents associated with this Project as required by law.

Comment Letter N – Watson, Janlee

Comment letter N commences on the next page.

Brady, Russell

From: Jannlee Watson <jannlee.watson@ca.rr.com>
Sent: Monday, July 09, 2018 1:21 PM
To: Brady, Russell
Subject: Comments -- EIR No. 552, Toscana Village at Temescal Valley

Dear Mr. Brady:

Here are my comments regarding Environmental Impact Report No. 552 for Toscana Village at Temescal Valley:

- N-1 **Traffic signals.** The project plans call for too many traffic signals. Traffic signals located at Temescal Canyon Road and Indian Truck Trail, Driveway 2, Driveway 3 and Driveway 4 will significantly slow down the flow of traffic along Temescal Canyon Road. Aggregate haulers heading southbound on Temescal Canyon Road from Maitri Road could choose the more expedient route of Campbell Ranch Road to Indian Truck Trail to access the southbound I-15. This route is to be discouraged because of the proximity to Sycamore Creek residential development. Fewer traffic signals also would provide some relief to the air quality issues with the project with less vehicular stops and accelerations. Can only one driveway traffic signal be considered?
- N-2 **Power poles.** Can the lines from the eight power poles that need to be relocated be placed underground? This would be in keeping with the precedent set by Terramor, Toscana Village's neighboring residential development now under construction.
- N-3 **Bike lanes.** Will bike lanes along Temescal Canyon road be required? Noted in the DEIR were several bicycle parking/storage areas within the center, an easy bike ride from the Terramor and Sycamore Creek communities. Encouraging nonmotorized transportation modes also will help with the air quality issue.
- N-4 **Errors.** This is stated in Exhibit C Habitat Assessment and is incorrect: "*The approximate 27.11-Acre Temescal Valley Toscana Village project is located in the City of Corona, Riverside County, California.*" Also stated in the same document and incorrect: "*The proposed project is located on a narrow strip of land between Interstate 15 (I-15) and Temescal Canyon Road in a relatively undeveloped area of the City of Corona.*" Also stated in the same document and incorrect: "*... thus high quality, connected habitat must be maintained in this area which is surrounded by the City of Corona and community development planned land uses.*"

Thank you –

Jannlee Watson
Temescal Valley resident

Response to Comment Letter N – Watson, Jannlee

Response to Comment N-1:

Commenter's opinion regarding too many traffic signals and the suggestion to only add one traffic signal is noted.

The commenter's opinion regarding traffic signals spacing too close and too congested for the shopping center needs is noted. The Traffic Impact Analysis (TIA) prepared for this Project (DEIR Appendix G), shows the proposed traffic controls will alleviate congestion. Only two new traffic signals are proposed at Project buildout (Phase II) in order to attain acceptable levels of service (LOS). LOS, as defined by HCM methodology, includes such factors as freedom to maneuver, traffic interruptions, comfort and convenience, and safety (DEIR, pp. 5.0-169-170). Hence, traffic signals can provide more than just reduced delay and improved traffic flow. A traffic signal at the intersection of Temescal Canyon Road and Project Driveway No. 1 is not required (DEIR, p. 5.1-194). Mitigation measures **MM Trans 4** requires one traffic signal at the intersection of Temescal Canyon Road and Project Driveway No. 2, **MM Trans 5** requires one traffic signal at the intersection of Temescal Canyon Road and Project Driveway No. 3, and **MM Trans 6** requires one traffic signal at the intersection of Temescal Canyon Road and Project Driveway No. 4 (DEIR, p. 5.0-194). The intersections of Temescal Canyon Road and Project Driveway No. 2 and Temescal Canyon Road and Project Driveway No. 3 have unacceptable PM peak hour LOS F without mitigation (for Existing Plus Ambient Plus Project (Phase II) Plus Cumulative (2018) conditions). With the installation of traffic signals at Project Driveways No. 2 and 3, the PM peak hour LOS will improve to C for both intersections (the AM peak hour without the signals is an acceptable C, and improves to a LOS B for both intersections) (TIA, p. 66). The intersection of Temescal Canyon Road and Project Driveway No. 4 (**MM Trans 6**) improves from LOS D to LOS B with installation of the traffic signal.

Additionally, **MM AQ 2** requires the Project to synchronize the Project's traffic signals at Project driveways and the intersection of Temescal Canyon Road and Indian Truck Trail which improves traffic flow by reducing acceleration/deceleration associated with stop-and-go traffic, hence reducing vehicular emissions (DEIR, p. 5.0-34). A traffic signal organizes the traffic at the intersection and allows each leg of the intersection a certain amount of time to complete their movement. While this may result in a little more delay for some legs of the intersection, the signal light ensures that all turning movements get a chance to occur which reduce the amount of backup associated with vehicles waiting to make a turn (DEIR, p. 5.0-189). Traffic signals are thus often utilized to improve traffic conditions and LOS at intersections. LOS, as defined HCM methodology, includes such factors as freedom to maneuver, traffic interruptions, comfort and convenience, and safety (DEIR, pp. 5.0-169-170). Hence, traffic signals can provide more than just reduced delay and improved traffic flow.

Response to Comment N-2:

Approximately eight (8) existing Southern California Edison (SCE) power poles that are located along Temescal Canyon Road and the project site's frontage will need to be relocated. The power poles will generally remain in the same location within the existing SCE Right-of-Way. The relocation is an adjustment in elevation because the existing elevation (or ground level) where

they are located and the proposed elevation after site grading and proposed improvements to the west side of Temescal Canyon Road are different. The elevation adjustments are anticipated to be completed by installing a new pole several feet away from the existing at the new elevation and then transferring the power lines from the previous pole to the new pole at the proper elevation (DEIR, p. 3.0-4).

The existing SCE power poles support several lines including SCE high voltage 115 kV (kilovolt) transmission lines (upper lines), 12 kV distribution lines (middle lines), and communication lines (lower lines) that go to the Ivyglen Substation located approximately 1-mile northwest of the Project site along Temescal Canyon Road on the west side of I-15. According to the SCE *Power Bulletin*, Volume 13 No. 4 May 2013 (https://www.sce.com/wps/wcm/connect/4a5ed5e3-b0e8-48cf-b7c3-8ba5000188a6/1304_PowerBulletin.pdf?MOD=AJPERES), “With safety, reliability, and affordability in mind, undergrounding transmission lines can cost up to 50 times more than an equivalent overhead line.” “Virtually all 230 kV and above high-voltage electrical transmission lines constructed are proposed as overhead infrastructure for three general reasons: cost, reliability, and environmental considerations.” “SCE’s preference for placing high voltage transmission lines on overhead structures is rooted in our responsibility to safely provide customers with the most affordable, reliable power possible. Underground construction has occurred nationally for lower voltage lines that power homes and businesses, typically, lines 33 kV and below. In rare instances, short portions of 115 kV, 230 kV, and 345 kV lines have been constructed underground.”

Riverside County zoning regulations indicate utilities shall be installed underground except that electrical lines rated at 33 kV or greater may be installed above ground. The proposed Project does not require installation of new electrical lines as it will connect to the existing SCE lines. As SCE’s existing poles support high voltage transmission lines (115 kV) they are not intended to be underground. Only elevation adjustments to approximately eight (8) existing SCE high voltage transmission lines will be made along the Project’s frontage with Temescal Canyon Road as required the Project’s grading activities.

Response to Comment N-3:

Bike lanes are not proposed along Temescal Canyon Road, according to Elsinore Area Plan Figure 8 – Elsinore Area Plan Trails and Bikeway System. (County of Riverside General Plan, Elsinore Area Plan, April 2017). The Temescal Canyon Road signing and striping plans prepared in conjunction with a separate development project also do not include bike lanes between Interstate 15 and Indian Truck Trail. However, bicycle parking is required pursuant to CALGreen Section 5.106.4. (DEIR, 5.0-84)

Response to Comment N-4:

Comment noted. The Habitat Assessment (Appendix C of the DEIR) does incorrectly state several different times that the project is located in the City of Corona.

However, the DEIR, Section 3.1 Project Location (DEIR, 3.0-1), correctly identifies the Project’s location in unincorporated Riverside County, not in the City of Corona as outlined below:

The project site is an approximately 27-acre area located east of the Interstate-15 (I-15) freeway, north of Indian Truck Trail and Corona Lake, and west of Temescal Canyon Road (Refer to Figure 3.0-1, Regional Map, Figure 3.0-2, Aerial Map, and Figure 3.0-3, USGS Topographic Map). The project site is located within the Elsinore Area Plan of the Riverside County General Plan and located adjacent to/southeast of the Temescal Canyon Area Plan (Figure 3.0-4, Riverside County Area Plans).

Section 3 – EIR Errata/Draft EIR Revisions

Any corrections to the Draft Environmental Impact Report (Draft EIR) text, tables, and figures generated either from responses to comments or independently by the County, are stated in this section of the Final EIR.

These Draft EIR revisions are provided to provide supplemental information for the Toscana Village at Temescal Valley Project Draft EIR. These changes to the Draft EIR merely amplify and clarify the analysis in the Draft EIR and constitute insignificant modifications to an adequate EIR.

The information included in these Draft EIR revisions that resulted from the public review process and independently by the County do not constitute substantial new information that requires recirculation of the Draft EIR (*CEQA Guidelines* § 15088.5).

3.1 Introduction

The Draft EIR was prepared to determine if there is potential for any significant environmental effects associated with the proposed Project components described in Section 3.0 Project Description of the Draft EIR.

Pursuant to Section 15105 of the *CEQA Guidelines*, the Draft EIR was circulated for a 45-day period between May 24, 2018 and July 9, 2018 to Responsible Agencies and interested parties for review and comment.

Section 15090 of the *CEQA Guidelines*, requires the decision-making body to consider the proposed Draft EIR together with any comments received during the public review process. In order to provide the decision makers with additional information upon which to base their decision, the following Responses to Comments have been prepared. The materials contained in this Final EIR include copies of comment letters and the County's responses to the applicable comments in each letter. Each comment letter is labeled alphabetically with each individual comment identified by a number. Copies of the comment letters are included in Section 2.3, Comment Letters, of this Final EIR.

Comments that were received on the Draft EIR during the public review period have resulted in minor errata/revisions to the text of the Draft EIR. These textual changes to the Draft EIR were determined by the County not to be "substantial revision" as defined in Section 15088.5 of the *CEQA Guidelines*. Therefore, recirculation of the Draft EIR is not required.

The EIR modification contained in the following pages in the same order as the information appears in the Draft EIR. Changes in text are signified by strikethrough (~~example text~~) where text has been removed and by underline (example text) where text has been added. The applicable page numbers from the Draft EIR are also provided where necessary for easy reference.

Section 1 – Executive Summary

The DEIR, page 1.0-2 is amended as follows:

Plot Plan No. 26290 covering Phase I of the planned development proposes the construction of 6 buildings totaling approximately 61,000 square feet for fast food, retail, office, and gas station use as outlined in **Table 1.0-A** below. Buildings 1 and 2 are single story 3,400 square foot fast food restaurants with drive-thrus. Building 3 is a single-story 3,800 square foot gas station with 42 16 fueling stations, car wash, and a convenience

store. Building 4 is single story 4,500 square foot restaurant. Building 5 is a two-story 39,900 square foot retail and office building. Building 6 is a single story 6,000 square foot restaurant.

Table 1.0-C, Draft EIR Impact Summary Matrix/Mitigation Monitoring Program

MM AQ 2: The Project shall synchronize signals at the intersection of Temescal Canyon Road and Indian Truck Trail and proposed signals at driveways 2, 3, and 4 along Temescal Canyon Road, which is designated as an arterial.

MM AQ 6: The Project shall install electrical hook-ups at the Project's loading docks and/or spaces that allow trucks that have auxiliary power units (APU) and/or transport refrigeration units (TRUs) with electric standby capabilities to plug in when APU and/or TRUs are in use. The County shall verify electrical hookups have been installed prior to occupancy. The electrical panels will be appropriately sized to allow for future expanded use of electric truck charging.

MM Trans 6: Prior to issuance of occupancy permit for Phase II Buildings, the implementing developer shall install a cross-street stop traffic signal at the intersection of Temescal Canyon Road and Project Driveway No. 4.

Section 2 – Introduction

The DEIR, page 2.0-2 is amended as follows:

South Coast Air Quality Management District (SCAQMD) is a responsible agency for the proposed Project that is responsible for issuance of gasoline station permits.

Section 3 – Project Description

The DEIR, page 3.0-2 is amended as follows:

Plot Plan No. 26290 covering Phase I of the planned development proposes the construction of 6 buildings totaling approximately 61,000 square feet for fast food, retail, office, and gas station use as outlined in **Table 3.0-A** below. Buildings 1 and 2 are single story 3,400 square foot fast food restaurants with drive-thrus. Building 3 is a single-story 3,800 square foot gas station with ~~12~~ 16 fueling stations, car wash, and a convenience store. Building 4 is single story 4,500 square foot restaurant. Building 5 is a two-story 39,900 square foot retail and office building. Building 6 is a single story 6,000 square foot restaurant.

The DEIR, page 3.0-19 is amended as follows:

Revised Figure 3.0-7 Site Plan

Section 4 – Environmental Effects found Not Significant

No changes were made to this Section of the Draft EIR.

Section 5 – Environmental Analysis

Section 5.1 – Air Quality

The DEIR, pages 5.0-17 is amended as follows:

Rule 201

The Project's gas station operator shall comply with SCAQMD Rule 201 (Permit to Construct) which requires obtaining written authorization for such construction from the Executive Officer before a person can build, erect, install, alter or replace any equipment, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce or control the issuance of air contaminants.

Rule 203

The Project's gas station operator shall comply with SCAQMD Rule 203 (Permit to Operate) which requires obtaining a written permit to operate from the Executive Officer before a person can operate or use any equipment, the use of which may cause the issuance of air contaminants, or the use of which may reduce or control the issuance of air contaminants.

The DEIR page 5.0-18 is amended as follows:

~~Gas stations are also be subject to SCAQMD Rule 2588 – Air Toxics “Hot Spots” Program.⁵~~

⁵ <https://www.aqmd.gov/prdas/AB2588/AB2588.html>

The DEIR page 5.0-21 (5.1.4 Project Design Considerations) is amended to include the follow additional design consideration:

Facilitating the installation for on-site renewable energy would reduce electricity demand at power plants reducing indirect electricity emissions. The Project will design buildings to have “solar ready” roofs that are structurally able to accommodate later installation of rooftop solar panels. Building operators providing rooftop solar panels will submit plans for solar panels prior to occupancy to the County for review.

The DEIR page 5.0-29 is amended as follows:

Gasoline Dispensing Emissions

Gasoline fueling stations are regulated by the SCAQMD Rule 461, Gasoline Storage and Dispensing, which requires an enhanced vapor recovery and diagnostic system. The purpose of this system is to collect and store gasoline vapors during both bulk deliveries and vehicle operations. In general, fuel dispensing systems are required to include dripless nozzles that seal to the vehicle during filling. A vacuum system forces the vapors created by the vehicle filling back to the underground storage tank (UST). The storage

tank is vented by a mechanical filtration system that scrubs and neutralizes the vapors before their release.

Similarly, during bulk delivery operations, the delivery truck's filling tubes are sealed to the storage tank and all vapors are returned to the UST. This process stems the release of vapors. The vapors created by the filling operation are then subject to mechanical scrubbing and neutralization prior to release. The final component of the vapor recovery process is the diagnostic system. This electronic system provides 24-hour monitoring of the vapor recovery system, including collection of vapors during fueling operations and assurances that vapors in the UST are not leaking. The system identifies failures automatically, notifies the station operator, and reduces emissions by early detection and prompt repair. Compliance with SCAQMD Rule 461, Gasoline Storage and Dispensing, ensures that impacts due to gasoline dispensing emissions are less-than-significant because the required vapor recovery system controls at least 95 percent of the emissions occurring during the gasoline transfer and dispensing activities.

The DEIR, pages 5.0-32 and 5.0-33 is amended as follows:

~~However, the gas station will also be subject to SCAQMD Rule 2588—Air Toxics “Hot Spots” Program.¹⁰ There are six important components to the program as follows:~~

- ~~1. Emissions Reporting—Facilities submit an air toxics inventory through the Annual Emissions Report (AER) Program.~~
- ~~2. Prioritization—From the reported toxic emissions, SCAQMD prioritizes facilities, using a procedure approved by the Governing Board, into three categories: high priority, intermediate priority, and low priority.~~
- ~~3. Risk Assessments—Potentially high risk facilities must prepare a health risk assessment (HRA).~~
- ~~4. Public Notice—If the risk reported in the HRA exceeds specific thresholds, then the facility is required to provide public notice to the affected community.~~
- ~~5. Risk Reduction—Facilities with health risks above the action risk levels in Rule 1402 must reduce their risks to the community.~~
- ~~6. Industry-Wide Source (IWS)—Smaller or “IWS” facilities are identified in California H&SC, Section 44323.~~

¹⁰ ~~<https://www.aqmd.gov/prdas/AB2588/AB2588.html>~~

The DEIR, pages 5.0-34 is amended as follows:

MM AQ 6: The Project shall install electrical hook-ups at the Project's loading docks and/or spaces that allow trucks that have auxiliary power units (APU) and/or transport refrigeration units (TRUs) with electric standby capabilities to plug in when APU and/or TRUs are in use. The County shall verify electrical hookups have been installed prior to occupancy. The electrical panels will be appropriately sized to allow for future expanded use of electric truck charging.

Section 5.2 – Biological Resources

The DEIR page 5.0-37 is amended as follows:

Coast Live Oak Trees

There are ~~twelve~~ ten (1210) large oak trees found on the southeast corner of the project site adjacent to Temescal Canyon Road. These trees have been tagged and numbered. Since these trees are spread out and do not form a uniform canopy, they are not considered an oak woodland plan community.

The DEIR page 5.0-45 is amended as follows:

Oak Tree Management Guidelines

The County's Oak Tree Management Guidelines, approved on March 2, 1993 and revised in September 1999, provides guidance that maximizes preservation and minimizes impacts to oak trees through project design for private development. ~~These guidelines require that the project preserve the oak trees or a Heritage Tree Preservation and Protection Plan be in place during the grading and construction activities.~~

The DEIR, page 5.0-44 and 5.0-45 are amended as follows:

5.2.2.4 Local Regulations

~~Riverside County Tree Policies, Plans, Ordinances, Guidance~~

~~Riverside County has an existing policy (County Policy 26) for tree removal on or adjacent to County road right-of-way (ROW) that was last revised in 1988. This policy is not exclusive to oak trees, it is applicable to all trees within or adjacent to the ROW. Under this policy, trees may be removed if the trees are determined to be dead or diseased, or pose a danger to traffic or private property (County of Riverside 1986). Furthermore, trees may be considered for removal if they create an unsafe condition, such as obstructing the view for vehicles or conflict with construction work or major maintenance project, or if removal is required by an adjacent property owner. Pursuant to this policy, the removal of trees is subject to the approval of the District Maintenance Supervisor.~~

Section 5.3 – Greenhouse Gas Emissions

No changes were made to this Section of the Draft EIR.

Section 5.4 – Hydrology and Water Quality

No changes were made to this Section of the Draft EIR.

Section 5.5 – Land Use

The DEIR, page 5.0-119 is amended as follows:

Threshold: Be compatible with existing and planned surrounding land uses.

As outlined above, SP 327 located north and east of the Project site is part of the Community of Spanish Hills (also known as Terramor) and is a growing community with new residential construction occurring. The Community of Sycamore Creek is opposite of the I-15 freeway (SP 256) to the west of the proposed Project site. The Community of Horsethief Canyon Ranch (including SP 152 & 333) is southeast of the proposed Project site. It is anticipated that the development and build out of the communities would represent a substantial portion of visitors to the proposed Project, once constructed. The proposed Project would be compatible with the surrounding existing and planned land uses. Surrounding land uses such as LI, CR (Commercial Retail), OS-C (Open Space-Conservation), MDR (Medium Density Residential), HDR (High Density Residential), and RM (Rural Mountainous) would be complimentary for the proposed Project as the proposed Project would ultimately offer an array of goods and services for the existing and developing communities in the area. The proposed project includes one (1) pylon sign and three (3) monument entry signs which require a variance to Ordinance No 348 Section 19.4 for exceeding the 2 signs allowed for a shopping center, and maximum height of 45 feet and surface area of 150 square feet within 660 feet of a freeway. The pylon sign is proposed to be 60 feet high and located along the project's southwest boundary and adjacent to the northbound on-ramp to the I-15 freeway at Indian Truck Trail. An evaluation was conducted¹ to simulate various reference heights (45, 60, and 80-foot heights) of the pylon sign from various viewpoints along the northbound and southbound I-15 near Indian Truck Trail. The proposed 60-foot high pylon sign would not exceed the height of other existing signs, hills, power lines, and light poles in the area and therefore would blend in with the other existing features in the area and would not substantially alter the views in the project area. Less than significant impacts would occur.

Section 5.6 – Noise

No changes were made to this Section of the Draft EIR.

Section 5.7 – Transportation and Traffic

The DEIR, page 5.0-162 is amended as follows:

The Riverside County Transportation Commission (RCTC) and the California Department of Transportation (Caltrans) have identified the I-15 corridor, starting at I-15/ Cajalco Road interchange in the City of Corona and extending north to the I-15/State Route 60 interchange in the City of Ontario, for future improvements that will construct ~~one or~~ two tolled expressed lanes in each direction. (RCTC I-15). Construction of this I-15 Express Lanes Project was under construction at the time of preparation of this FEIR. RCTC plans to construct in the future two express lanes in each direction from Cajalco Road south to State Route 74.

The DEIR, page 5.0-167 is amended as follows:

Significance Criteria and Methodology

Intersections

¹ Toscana Village Pylon Survey, prepared by Fusion Sign and Design, available at the County Planning Department.

Traffic operations are quantified through the determination of "Level of Service" (LOS). Level of Service is defined in the 2010 Highway Capacity Manual as a quantitative stratification of a performance measure or measures that represent quality of service, measured on an A-F scale ~~a qualitative measure of traffic operating conditions~~, whereby a letter grade "A" through "F" is assigned to an infrastructure facility (intersection) representing progressively worsening traffic conditions. The specific LOS definitions for intersections in the County are described in **Table 5.5-C, Intersection LOS Criteria**.

Subsequent to preparation of the Draft EIR and circulation for public review a minor revision was made to the site plan and project description to include 2 additional gas pumps with 4 vehicle fueling positions. The additional fueling positions would increase the number of trips generated by Phase I and the overall proposed project. The revised trip generation rates, with the additional 4 vehicle fueling positions is outlined below in Table 5.0-X. The TIA for the proposed Project used trip generation rates based on the 9th Edition of the Institute of Transportation Engineers (ITE) Trip Generation Manual, as it was the current version at the time the TIA was prepared. An evaluation was prepared to determine the additional number of vehicular trips that would be generated due to the increased number of vehicle fueling positions, included herein as Attachment F to this FEIR. The revised trip generation rates are outlined below for pages 5.0-175 and 5.0-176 of the DEIR.

The DEIR, page 5.0-175, Table 5.0-X is amended as follows:

A summary of trips the Project is anticipated to generate is shown in **Table 5.0-X: Trip Generation Summary**, below.

Table 5.0-X: Trip Generation Summary

Land Use	Quantity ¹		Peak Hour						Daily
			AM			PM			
			IN	OUT	Total	IN	OUT	Total	
Phase I									
Gas/Service Station w/Food Mart and Car Wash	4216	VFP	7297	7093	142190	85113	84109	166222	1,834,445
Fast Food w/ Drive Thru	6.8	TSF	157	151	308	115	107	222	3,374
High Turnover (Sit-Down) Restaurant	10.5	TSF	62	51	113	62	41	103	1,335
General Office Building	14.0	TSF	35	5	40	16	78	94	295
Shopping Center	25.9	TSF	42	26	68	116	126	242	2,822
Phase I Subtotal			368	303	671	394	433	827	9,660
			393	326	719	422	461	883	10,271
Pass-By Reduction (15%)			(55)	(45)	(101)	(59)	(65)	(124)	(1449)
			(59)	(49)	(108)	(63)	(69)	(132)	(1,541)
Internal Trips (5%)			(17)	(17)	(34)	(21)	(20)	(41)	(483)
			(18)	(18)	(36)	(22)	(22)	(44)	(514)
TOTAL (Phase I)			296	241	537	314	348	662	7,728
			316	259	575	337	370	707	8,216
Phase II									
General Office Building	42	TSF	84	11	95	21	104	125	679
Shopping Center	21	TSF	37	23	60	101	109	210	2,462
Supermarket	42	TSF	91	55	146	208	200	408	4,396
Drive-in Bank	3.5	TSF	24	55	146	208	200	408	4,396
High Turnover (Sit-Down) Restaurant	9.5	TSF	57	46	103	56	37	93	1,208
Pharmacy/Drugstore w/Drive-Thru window	14	TSF	21	16	37	59	62	121	1,234
Phase II Subtotal			314	170	484	490	557	1047	10,498
Pass-By Pass Reduction (15%)			(47)	(26)	(73)	(74)	(84)	(157)	(1575)
Internal Trips (5%)			(12)	(12)	(24)	(26)	(26)	(52)	(525)
TOTAL (Phase II)			225	132	387	390	447	837	8,398
Total Project Trip Generation			554	373	924	704	795	1,499	16,126
			571	391	962	727	817	1,544	16,614

Source: TSI, Table 4-2

The DEIR, page 5.0-176 is amended as follows:

Phase I

The Project is anticipated to generate a total of approximately ~~7,728~~ 8,216 trip-ends per day in Phase I with ~~537~~ 575 vehicles per hour during the AM peak hour and ~~662~~ 707 vehicles per hour during the PM peak hour.

Phase II

The Project is anticipated to generate a total of approximately 8,398 trip-ends per day in Phase II with 387 vehicles per hour during the AM peak hour and 837 vehicles per hour during the PM peak hour.

Thus, buildout of the project (Phase I plus Phase II) is expected to generate a total of ~~16,126~~ 16,614 trip-ends per day with ~~924~~ 962 vehicles per hour during the AM peak hour and ~~1,499~~ 1,544 vehicles per hour during the PM peak hour.

The revised site plan would generate 488 (3.0% increase) more trips per day. Therefore, the additional vehicle fueling positions will slightly increase the project trip generation.

The TIA indicates that the study intersections have excess capacity with the recommended improvements, therefore the small increase in the amount of trips generated as a result of the 4 additional vehicle fueling positions is not expected to have any significant adverse impacts that would alter the LOS or the required improvements to serve the traffic generated by the project.

Further, when the TIA was prepared the 9th Edition of the ITE Trip Generation Manual was the most current version and was used for the project's trip generation rate. The 10th edition of the ITE Trip Generation Manual is currently available. Overall generation rates are lower in the 10th Edition than in the 9th Edition for the proposed Project Utilizing the 10th Edition, the revised site plan would generate 569 less trips (3.5% decrease). Therefore, the increase trip generation from the revised site plan would be offset by the decrease in trip generation utilizing the most current version of the ITE Trip Generation Manual.

The revised DEIR is not considered significant new information per CEQA Guidelines Section 15088.5 because it does not change the Project impacts and/or mitigation measures such that new or more severe environmental impacts result from the Project. The revised Table 5.0-X Trip Generation Summary only clarifies the trip generation rates based on the current site plan. While the small increase in trip generation from the site plan change with 2 additional gas pumps does provide new information about the Project, it is not considered significant because it does not introduce a new significant environmental impact, a substantial increase in an environmental impact that would result in the need for mitigation to reduce impacts to less than significant, or a new feasible project alternative or mitigation measure.

The DEIR, page 5.0-194 is amended as follows:

Operational Mitigation

Phase II

MM Trans 6: Prior to issuance of occupancy permit for Phase II Buildings, the implementing developer shall install a ~~cross street stop traffic signal~~ at the intersection of Temescal Canyon Road and Project Driveway No. 4.

Section 5.8 – Tribal Cultural Resources

The DEIR page 5.0-196 is amended as follows:

In consultation with the Pechanga Band of Luiseño Indians (Pechanga Tribe), the Pechanga Tribe asserts that the proposed Project area is in an area associated with the 'Atáaxum 'Atdaxum Luiseño as evidenced by the existence of 'Atáaxum 'Atdaxum place names, a Traditional Cultural Property (TCP), several large village complexes, tóota yixelval ~~toota yixelval~~ (rock art, pictographs, petroglyphs), an extensive artifact record, and known human remains in the vicinity of the Project. This culturally sensitive area is affiliated with the Pechanga Temecula Band of Luiseño Indians because of the tribe's cultural ties to this area.

The DEIR page 5.0-200 is amended as follows:

The County received a letter from the Pechanga Tribe dated August 2, 2017 where the Pechanga Tribe requests the reopening of AB52 consultation with the County to discuss how the DEIR will address tribal cultural resources and further requests to be involved in reviewing drafts of the language for the tribal cultural resource section of the DEIR prior to its release for public review. The Pechanga Tribe asserts that the proposed Project area is in an area associated with the 'Atáaxum 'Atdaxum Luiseño as evidenced by the existence of 'Atáaxum 'Atdaxum place names, several large village complexes, tóota yixelval ~~toota yixelval~~ (rock art, pictographs, petroglyphs), an extensive artifact record, and known human remains in the vicinity of the Project. The project area also falls within the limits of a large Traditional Cultural Property (TCP). This culturally sensitive area is affiliated with the Pechanga Temecula Band of Luiseño Indians because of the tribe's cultural ties to this area. In the letter from the Pechanga Tribe, the Pechanga Tribe lists relevant regulations for the County to ensure compliance with and then discusses potential impacts to tribal cultural resources and recommends mitigation measures should the project uncover potential tribal cultural resources.

Section 6 – Other CEQA Topics

No changes were made to this Section of the Draft EIR.

Section 7 – Alternatives to the Proposed Project

No changes were made to this Section of the Draft EIR.

4 Mitigation Monitoring and Reporting Program (MMRP)

4.1 Introduction

This Mitigation Monitoring and Reporting Program (MMRP) has been prepared for use in implementing the mitigation measures that are part of the EIR that will be certified by the County of Riverside for the Toscana Village at Temescal Valley Project. The MMRP has been prepared in compliance with State law and the insert project name Environmental Impact Report (EIR) (State Clearinghouse No. 2017071006) prepared for the Project by the County of Riverside.

The California Environmental Quality Act (CEQA) requires adoption of a reporting or monitoring program for those measures placed on a project to mitigate or avoid adverse effects on the environment (California Public Resources Code § 21081.6). The law states that the reporting or monitoring program shall be designed to ensure compliance during project implementation.

The monitoring program contains the following elements:

- 1) The mitigation measures are recorded with the action and procedure necessary to ensure compliance. In some instances, one action may be used to verify implementation of several mitigation measures.
- 2) A procedure for compliance and verification has been outlined for each action necessary. This procedure designates who will take action, what action will be taken and when, and to whom and when compliance will be reported.
- 3) The program has been designated to be flexible. As monitoring progresses, changes to compliance procedures may be necessary based upon recommendations by those responsible for the program. As changes are made, new monitoring compliance procedures and records will be developed and incorporated into the program.

4.2 Mitigation Monitoring and Responsibilities

As the Lead Agency, the County of Riverside (County) is responsible for ensuring full compliance with the mitigation measures adopted for the proposed Project. The County will monitor and report on all mitigation activities. Mitigation measures will be implemented at different stages of development throughout the project area. In this regard, the responsibilities for implementation have been assigned to the Applicant, Contractor, or a combination thereof. If during the course of project implementation, any of the mitigation measures identified herein cannot be successfully implemented, the County shall be immediately informed, and the County will then inform any affected responsible agencies. The County, in conjunction with any affected responsible agencies, will then determine if modification to the project is required and/or whether alternative mitigation is appropriate.

Impact Topic/ Threshold	Mitigation Measure (MM) or Existing Regulation (ER)	Implementation Timing	Responsible Party	Monitoring Agency	Verification of Compliance			
					Initials	Date	Remarks	
<p>5.1 Air Quality</p> <p>Threshold: Conflict with or obstruct implementation of the applicable air quality plan.</p> <p>Threshold: Violate any air quality standard or contribute substantially to an existing or projected air quality violation.</p> <p>Threshold: Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors).</p>	<p>ER AQ 1: Consistent with the 2016 CalGreen Code, the Project shall provide reserved preferential parking spaces for car-share, carpool, and ultra-low or zero emission vehicles; or, provide larger parking spaces that can accommodate vans used for ride-sharing programs and reserve them for vanpools and include adequate passenger waiting/loading areas.</p> <p>MM AQ 2: The Project shall synchronize signals at the intersection of Temescal Canyon Road and Indian Truck Trail and proposed signals at driveways 2, 3, and 4 along Temescal Canyon Road, which is designated as an arterial.</p> <p>MM AQ 3: The Project shall provide circuit and capacity for electric vehicle (EV) charging stations in construction plans and specifications to facilitate future installation of electric vehicle supply equipment (EVSE). As required by the 2016 CalGreen Building Code, 10 percent of the proposed parking spaces at the Project site will require EV charging circuit and capacity and it is assumed that a minimum of 4 areas will contain these spaces.</p> <p>MM AQ 4: Where transport refrigeration units (TRUs) are in use, electrical hookups will be installed at all loading and unloading stalls in order to allow TRUs with electric standby capabilities to use them.</p> <p>MM AQ 5: The Project shall provide information to future office tenants about the benefits of telecommuting and alternative work schedules that include reducing the number of commute trips and therefore vehicle miles traveled from employees.</p> <p>MM AQ 6: The Project shall install electrical hook-ups at the Project's loading docks and/or spaces that allow trucks that have auxiliary power units (APU) and/or transport refrigeration units (TRUs) with electric standby capabilities to plug in when APU and/or TRUs are in use. The County shall verify electrical hookups have been installed prior to occupancy. The electrical panels will be appropriately sized to allow for future expanded use of electric truck charging.</p>	<p>Prior to issuance of occupancy permit.</p> <p>Prior to issuance of occupancy permit for Phase II buildings for driveways 2, 3 and 4.</p> <p>Prior to issuance of occupancy permit.</p> <p>During project operations.</p> <p>During project operations.</p> <p>Prior to issuance of occupancy permit.</p>	<p>Project Applicant & Contractors</p> <p>Project Applicant & Contractors</p> <p>Project Applicant & Contractors</p> <p>Project Applicant</p> <p>Project Applicant</p> <p>Project Applicant</p>	<p>Riverside Building & Safety Department</p> <p>Riverside Building & Safety Department</p> <p>Riverside Building & Safety Department</p> <p>Riverside Building & Safety Department</p> <p>Riverside Building & Safety Department</p> <p>Riverside Building & Safety Department</p>	<p>County Safety</p> <p>County Safety</p> <p>County Safety</p> <p>County Safety</p> <p>County Safety</p> <p>County Safety</p>			
<p>5.2 Biological Resources</p>								

Impact Topic/ Threshold	Mitigation Measure (MM) or Existing Regulation (ER)	Implementation Timing	Responsible Party	Verification of Compliance		
				Monitoring Agency	Initials	Date
<p>Threshold: Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional or state conservation plan.</p> <p>Threshold: Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.</p>	<p>MM Bio 1: During soil excavation, grading, or other subsurface disturbance within 100 feet of conserved riparian/riverine habitat onsite, the construction superintendent shall supervise provision and maintenance of all standard dust control best management practices (BMPs) to reduce fugitive dust emissions, including but not limited to the following actions:</p> <ul style="list-style-type: none"> ▪ Water any exposed soil areas a minimum of twice per day, or as allowed under any imposed drought restrictions. On windy days or when fugitive dust can be observed leaving the construction site, additional water shall be applied at a frequency to be determined by the on-site construction superintendent; ▪ Pave, periodically water, or apply chemical stabilizer to construction access/ egress points; ▪ Minimize the amount of area disturbed by clearing, grading, earthmoving, or excavation operations at all times; ▪ Operate all vehicles on graded areas at speeds less than 15 miles per hour; and ▪ Cover all stockpiles that will not be utilized within three days with plastic or equivalent material, to be determined by the onsite construction superintendent, or spray them with a non-toxic chemical stabilizer. 	<p>During grading activities.</p>	<p>Project Applicant & Contractors</p>	<p>Riverside Building & Safety Department</p>	<p>County Safety</p>	
	<p>MM BIO 2: The onsite construction superintendent shall implement the following measures to minimize short-term noise levels caused by construction activities. Measures to reduce construction noise shall be included in contractor specifications and include, but not be limited to, the following:</p> <ul style="list-style-type: none"> ▪ Properly outfit and maintain construction equipment with manufacturer-recommended noise-reduction devices to minimize construction-generated noise; ▪ Operate all diesel equipment with closed engine doors and equip with factory recommended mufflers; ▪ Use electrical power, when feasible, to operate air compressors and similar power tools; ▪ Employ additional noise attenuation techniques, as needed, to reduce excessive noise levels within conserved Riparian/ Riverine Habitat onsite, such as 	<p>During construction.</p>	<p>Project Applicant & Contractors</p>	<p>Riverside Building & Safety Department</p>	<p>County Safety</p>	

Impact Topic/ Threshold	Mitigation Measure (MM) or Existing Regulation (ER)	Implementation Timing	Responsible Party	Monitoring Agency	Verification of Compliance		
					Initials	Date	Remarks
	<p>placement of temporary sound barriers or sound blankets at the top of slope adjacent to these areas; and</p> <ul style="list-style-type: none"> Locate construction staging areas at least 100 feet from Drainage 4. 						
	<p>MM BIO 3: To avoid light spillover into the adjacent conserved riparian/riverine habitat onsite, any proposed lighting fixtures within 100 feet of these areas shall incorporate internal baffles to direct the light towards the ground and shall have a zero side-angle cut-off to the horizon. All lighting and fencing for infrastructure adjacent to jurisdictional areas shall be designed or reviewed by a qualified biologist to allow wildlife to move without hindrance.</p>	During construction.	Project Applicant & Contractors and qualified biologist	Riverside County Environmental Programs Department			
	<p>MM BIO 4: The following measures shall be incorporated into the construction documents and specifications, and implemented by the contractor during grading activities, to avoid potential construction-related impacts to conserved riparian/riverine habitat outside of the approved disturbance limits:</p> <ul style="list-style-type: none"> Construction worker training will be provided by a qualified biologist at the first preconstruction meeting. Exclusionary fencing and signs will be erected near the top of slope adjacent to conserved riparian/riverine habitat to prevent accidental/unauthorized intrusions during construction. No equipment will be operated in areas of flowing water. Construction access and staging areas for storage of materials and heavy equipment, and for fueling, cleaning, or maintenance of construction vehicles or equipment, will be prohibited within 20 feet from the top of slope adjacent to conserved riparian/riverine habitat; and A qualified biologist will be onsite during initial clearing/grubbing, grading, and/or construction activities within the riparian/riverine habitat within Drainage 6 to be impacted, or within 100 feet of the habitat to be avoided, and shall periodically monitor these activities to ensure they do not exceed the fenced construction limits. A brief summary report shall be prepared by the monitoring biologist and submitted to the Riverside County Environmental Programs Department prior to issuance of a building permit. 	Prior to grading and during construction.	Project Applicant & Contractors and qualified biologist	Riverside County Environmental Programs Department			

RVA

Impact Topic/ Threshold	Mitigation Measure (MM) or Existing Regulation (ER)	Implementation Timing	Responsible Party	Monitoring Agency	Verification of Compliance	
					Initials	Date
	<p>MM BIO 5: The project shall incorporate special edge treatments designed to minimize edge effects by providing a safe transition between developed areas and conserved riparian/riverine habitat, and which would be compatible with project operation and the protection and sustainability of conserved areas. Special edge treatments shall include native landscaping on re-contoured slopes as part of the proposed 1.7-acre onsite conservation areas which includes the creation of wetland and riparian/riverine habitat, as well as fencing/signage near the top of slope adjacent to the proposed onsite conservation area to prevent unauthorized public access, vandalism, illegal dumping, and other adverse human disturbances. These edge treatments shall be included in the landscape plans and approved by the County Planning Department prior to issuance of a building permit.</p>	Prior to issuance of occupancy permit.	Project Applicant & Contractors and qualified biologist	Riverside County Environmental Programs Department		
	<p>MM BIO 6: Prior to issuance of a grading permit, a pre-construction presence/absence survey for burrowing owl within the survey area where suitable habitat is present shall be conducted (in accordance of MSHCP Burrowing Owl Objective 6). Surveys shall be conducted within 30 days prior to disturbance. Take of active nests will be avoided. Passive relocation (use of one-way doors and collapse of burrows) will occur when owls are present outside the nesting season.</p>	Prior to issuance of grading permit.	Project Applicant & Contractors and qualified biologist	Riverside County Environmental Programs Department		
	<p>MM BIO 7: Prior to issuance of a grading permit, if ground-disturbing activities or removal of any trees, shrubs, or any other potential nesting habitat are scheduled within the avian nesting season (nesting season generally extend from February 1 - August 31, but can vary from year to year based upon seasonal weather conditions), a pre-construction clearance survey for nesting birds, should be conducted within 10 days prior to any ground disturbing activities to ensure that no nesting birds will be disturbed during construction. The biologist conducting the clearance survey should document a negative survey with a brief letter report indicating that no impacts to active bird nests will occur. If an active avian nest is discovered during the 10-day preconstruction clearance survey, construction activities should stay outside of a 300-foot buffer around the active nest. For raptor species, this buffer is expanded to 500-feet. It is recommended that a biological monitor be present to delineate the boundaries of the buffer area and to monitor the active nest to ensure that nesting behavior is not adversely affected by the construction activity. Once</p>	Prior to issuance of grading permit.	Project Applicant & Contractors and qualified biologist	Riverside County Environmental Programs Department		

RVA

Impact Topic/ Threshold	Mitigation Measure (MM) or Existing Regulation (ER)	Implementation Timing	Responsible Party	Monitoring Agency	Verification of Compliance	
					Initials	Date
	the young have fledged and left the nest, normal construction activities can occur.					
Greenhouse Gas Emissions						
Threshold: <i>Generate greenhouse gas emissions either directly or indirectly, that may have a significant impact on the environment.</i>	ER AQ 1: Consistent with the 2016 CalGreen Code, the Project shall provide reserved preferential parking spaces for car-share, carpool, and ultra-low or zero emission vehicles; or, provide larger parking spaces that can accommodate vans used for ride-sharing programs and reserve them for vanpools and include adequate passenger waiting/loading areas.	Prior to issuance of occupancy permit.	Project Applicant & Contractors	Riverside Building & Safety Department	County Safety	
	MM AQ 2: The Project shall synchronize signals at the intersection of Temescal Canyon Road and Indian Truck Trail and proposed signals at driveways 2, 3, and 4 along Temescal Canyon Road, which is designated as an arterial.	Prior to issuance of occupancy permit for Phase I for driveway 2 and Phase II for driveway 4.	Project Applicant & Contractors	Riverside Building & Safety Department	County Safety	
	MM AQ 3: The Project shall provide circuit and capacity for electric vehicle (EV) charging stations in construction plans and specifications to facilitate future installation of electric vehicle supply equipment (EVSE). As required by the 2016 CalGreen Building Code, 10 percent of the proposed parking spaces at the Project site will require EV charging circuit and capacity and it is assumed that a minimum of 4 areas will contain these spaces.	Prior to issuance of occupancy permit.	Project Applicant & Contractors	Riverside Building & Safety Department	County Safety	
	MM AQ 4: Where transport refrigeration units (TRUs) are in use, electrical hookups will be installed at all loading and unloading stalls in order to allow TRUs with electric standby capabilities to use them.	During project operations.	Project Applicant	Riverside Building & Safety Department	County Safety	
	MM AQ 5: The Project shall provide information to future office tenants about the benefits of telecommuting and alternative work schedules that include reducing the number of commute trips and therefore vehicle miles traveled from employees.	During project operations.	Project Applicant	Riverside Building & Safety Department	County Safety	
	MM AQ 6: The Project shall install electrical hook-ups at the Project's loading docks and/or spaces that allow trucks that have auxiliary power units (APU) and/or transport refrigeration units (TRUs) with electric standby capabilities to plug in when APU and/or TRUs are in use. The County shall verify electrical hookups have been installed prior to occupancy. The	Prior to issuance of occupancy permit.	Project Applicant	Riverside Building & Safety Department	County Safety	

Impact Topic/ Threshold	Mitigation Measure (MM) or Existing Regulation (ER)	Implementation Timing	Responsible Party	Monitoring Agency	Verification of Compliance	
					Initials	Date
	electrical panels will be appropriately sized to allow for future expanded use of electric truck charging.					
Noise						
Threshold: Expose people residing or working in the project area to excessive highway noise.	<p>MM Noise 1: A Final Acoustical Impact Analysis shall be prepared by a noise specialist and submitted to the County Department of Environmental Health for each implementing development plan of the Project (i.e., site plans). The Final Acoustical Impact Analysis shall determine whether the proposed building elevations and wall assemblies of the building facades that will face the I-15 Freeway and Temescal Canyon Road will adequately reduce interior noise levels to 55 dBA CNEL. The Final Acoustical Impact Analysis shall identify any necessary building design measures to meet the interior noise level standard of 55 dBA CNEL and these measures shall be incorporated into the building(s).</p> <p>MM Noise 2: Any outdoor use areas (such as restaurant patios and courtyards) that provide tables and/or active and passive outdoor recreation areas that are located within the yellow or orange contours shown on Figure 5.6-3 – Future Traffic Noise Contours shall be shielded by proposed buildings and/or six-foot barriers. The barriers shall be solid with no cracks and shall completely block the line of sight between outdoor use areas and the I-15 Freeway. Outdoor use areas shall not be located in areas within the red contour area shown on Figure 5.6-3 – Future Traffic Noise Contours.</p> <p>MM Noise 3: During all Project-related excavation and grading, the construction contractor(s) shall equip all construction equipment, fixed and mobile, with properly operating and maintained mufflers consistent with manufacturer standards.</p> <p>MM Noise 4: The contractor(s) shall locate equipment staging in areas that will create the greatest distance between construction-related noise/vibration sources and sensitive receptors (residences) nearest the Project site during all Project construction.</p> <p>MM Noise 5: The use of amplified music or sound is prohibited on the Project site during construction.</p>	Prior to issuance of occupancy permit.	Project Applicant and noise specialist.	Riverside County Department of Environmental Health		
Threshold: Result in a substantial temporary or periodic increase in ambient						
Threshold: Expose persons to, or generation of, noise levels in excess of standards established in the local general plan or noise						

Impact Topic/ Threshold ordinance, or applicable standards of other agencies.	Mitigation Measure (MM) or Existing Regulation (ER)	Implementation Timing	Responsible Party	Monitoring Agency	Verification of Compliance	
					Initials	Date
Transportation/ Traffic						
Threshold: Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit; or Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways.	MM Trans 1: A Construction Traffic Control Plan shall be prepared for each phase of development (Phase I and Phase II) by the implementing developer and submitted to the County of Riverside Transportation Department for approval prior to the issuance of building permits for the Project. The Construction Traffic Control Plan shall include the estimated day(s), time(s) and duration of any lane closures that are anticipated to be required due to Project construction. The Construction Traffic Control Plan shall include measures such as, but not limited to, signage, flagmen, cones, advance community notice, or other acceptable measures to the satisfaction of the County of Riverside Transportation Department. The purpose of the measures shall be to safely guide motorists, cyclists, and pedestrians, minimize traffic impacts and ensure the safe and even flow of traffic consistent with County level of service standards and safety requirements. The implementing developer or its general contractor shall be required to notify the County of Riverside Transportation Department at least five (5) business days in advance of any planned lane closure that will be caused by Project construction. The County shall evaluate any other known lane closures, construction activities or special events which may conflict with the Project's scheduled lane closure or create additional impacts to traffic flow and, if deemed necessary by the County of Riverside Transportation Department, the Project's lane closure may be postponed or rescheduled. MM Trans 2: Sight distance at the Project driveways shall be reviewed with respect to the County's sight distance standards at the time of preparation of final grading, landscape, and street improvement plans. MM Trans 3: Signing/stripping shall be implemented in conjunction with detailed construction plans for the Project site. MM Trans 4: Prior to issuance of occupancy permit for Phase II Buildings, the implementing developer shall install a traffic signal at the intersection of Temescal Canyon Road and Project Driveway No. 2.	Prior to issuance of building permits.	Project Applicant & Contractors	Riverside County Transportation Department		

Impact Topic/ Threshold	Mitigation Measure (MM) or Existing Regulation (ER)	Implementation Timing	Responsible Party & Project Applicant & Contractors	Monitoring Agency	Verification of Compliance	
					Initials	Date
	<p>MM Trans 5: Prior to issuance of occupancy permit for Phase II Buildings, the implementing developer shall install a traffic signal at the intersection of Temescal Canyon Road and Project Driveway No. 3.</p> <p>MM Trans 6: Prior to issuance of occupancy permit for Phase II Buildings, the implementing developer shall install a traffic signal at the intersection of Temescal Canyon Road and Project Driveway No. 4.</p> <p>MM Trans 7: Prior to issuance of occupancy permit for Phase II Buildings, the implementing developer shall install the following improvements at the intersection of Temescal Canyon Road and Indian Truck Trail:</p> <ul style="list-style-type: none"> ▪ A second southbound through lane; and ▪ One southbound right turn overlap phase. 	<p>Prior to issuance of occupancy permits for Phase II.</p> <p>Prior to issuance of occupancy permits for Phase II.</p> <p>Prior to issuance of occupancy permits for Phase II.</p>	<p>Project Applicant & Contractors</p> <p>Project Applicant & Contractors</p> <p>Project Applicant & Contractors</p>	<p>Riverside County Transportation Department</p> <p>Riverside County Transportation Department</p> <p>Riverside County Transportation Department</p>		