

**SUBMITTAL TO THE BOARD OF SUPERVISORS  
COUNTY OF RIVERSIDE, STATE OF CALIFORNIA**



**ITEM  
21.2  
(ID # 9716)**

**MEETING DATE:**  
Tuesday, June 4, 2019

**FROM :** TLMA-PLANNING:

**SUBJECT:** TRANSPORTATION & LAND MANAGEMENT AGENCY/PLANNING: PUBLIC HEARING on CHANGE OF ZONE NO. 7937, ORDINANCE NO.348.4909, TENTATIVE TRACT MAP NO. 37294, PLOT PLAN NO. 26249, and MITIGATED NEGATIVE DECLARATION for ENVIRONMENTAL ASSESSMENT NO. 43021 – Applicant: Newland Homes LLC – Representative: Proactive Engineering – Third Supervisorial District – Rancho California Zoning Area – Southwest Area Plan – General Plan: Community Development: Medium Density Residential (2 – 5 dwelling units per acre) – Zoning: Rural Residential (R-R) – Location: Northerly of Los Alamos Road, Southerly of De Caron Street, Easterly of Suzi Reid Way and Westerly of Briggs Road. – 12.5 acres – REQUEST: Change of Zone No. 7937 is a proposal to change the zoning classification from Rural Residential (R-R) to Planned Residential (R-4). Tentative Tract Map No. 37294 is a proposal for a Schedule “A” subdivision of 12.5 gross acre area into 48 single-family residential lots, ranging in size from 5,017 to 7,998 square feet, and also include one (1) water quality basin, and four (4) open space lots consisting of 3.6 acres. Plot Plan No. 26249 is a proposal for a development with elevations and floorplans on lots 1-48 for the Tentative Tract Map No. 37294. APN’s: 480-100-075 and 480-100-009. District 3. Applicant Fees 100%]

**RECOMMENDED MOTION:** That the Board of Supervisors:

Continued on page 2

**ACTION:Policy**

  
Charissa Leach, Assistant TLMA Director

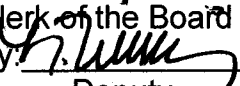
5/13/2019

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**MINUTES OF THE BOARD OF SUPERVISORS**

On motion of Supervisor Washington, seconded by Supervisor Spiegel and duly carried by unanimous vote, IT WAS ORDERED that the above matter is tentatively approved as recommended; Ordinance 348.4909 is adopted with waiver of the reading; and staff is directed to prepare the necessary documents for final action.

**Ayes:** Jeffries, Spiegel, Washington, Perez and Hewitt  
**Nays:** None  
**Absent:** None  
**Date:** June 4, 2019  
**xc:** Planning, COB, Co.Co., MC

Kecia Harper  
Clerk of the Board  
By:   
Deputy

**SUBMITTAL TO THE BOARD OF SUPERVISORS COUNTY OF RIVERSIDE,  
STATE OF CALIFORNIA**

**RECOMMENDED MOTION:** That the Board of Supervisors:

1. **ADOPT** the **MITIGATED NEGATIVE DECLARATION** for **ENVIRONMENTAL ASSESSMENT NO. 43021**, based on the findings incorporated in the initial study and the conclusion that the project will not have a significant effect on the environment;
2. **APPROVE CHANGE OF ZONE NO. 7937**, amending the project site's Zoning Classification from Rural Residential (R-R) to Planned Residential (R-4) in accordance with Exhibit No. 3 attached hereto, based upon the findings and conclusions incorporated in the staff report;
3. **ADOPT ORDINANCE NO. 348.4909**, amending the zoning in the Southwest Area Plan shown on Map No. 2.2439, Change of Zone No. 7937 attached hereto and incorporated by reference;
4. **APPROVE TENTATIVE TRACT MAP NO. 37294**, in accordance with Attachment G, subject to the attached conditions of approval and advisory notification document, and based upon the findings and conclusions incorporated in the staff report; and
5. **APPROVE PLOT PLAN NO. 26249**, in accordance with Attachment F, subject to the attached conditions of approval and advisory notification document, and based upon the findings and conclusions incorporated in the staff report.

<b>FINANCIAL DATA</b>	<b>Current Fiscal Year:</b>	<b>Next Fiscal Year:</b>	<b>Total Cost:</b>	<b>Ongoing Cost</b>
<b>COST</b>	\$ N/A	\$ N/A	\$ N/A	\$ N/A
<b>NET COUNTY COST</b>	\$ N/A	\$ N/A	\$ N/A	\$ N/A
<b>SOURCE OF FUNDS: Applicant Fees (100%)</b>			<b>Budget Adjustment:</b>	No
			<b>For Fiscal Year:</b>	N/A

**C.E.O. RECOMMENDATION:** Approve

**BACKGROUND:**

**Summary**

On April 26, 2017, the proposed project's Change of Zone No. 7937 ("Change of Zone"), Tentative Tract Map No. 37294 ("Tentative Tract Map") and Plot Plan No. 26249 ("Plot Plan") were submitted to the County of Riverside.

Additionally, a Lot Line Adjustment application (LLA180008) was submitted on February 28, 2018. The Lot Line Adjustment proposed to incorporate the lower southeastern part of an approximately 745 foot strip of the Parcel 480-100-076 into Parcel 480-100-009. The Lot Line Adjustment has been finalized and the present parcels included in this project are 480-100-075 and 480-100-009.

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STATE OF CALIFORNIA**

During the land use review process, two options of the Tentative Tract Map were considered by Staff. Option 1 shows an emergency vehicle access only onto Los Alamos Road, and Option 2 shows secondary access onto Los Alamos Road. Both options were considered in the Initial Study, and no potentially significant impacts were identified under either Options. The Tentative Tract Map recommended for approval by the Planning Commission, attached hereto as Attachment G, includes emergency vehicle access only onto Los Alamos.

On March 13th, 14th and 17th, the Planning Staff received letters of concern on the potential impacts of this project on the environment from a property owner located south of the proposed project on Los Alamos Road. On March 20, 2019, at the Planning Commission meeting the Planning Department recommended that the project be continued to April 3, 2019, to address the concerns.

Riverside County Staff and the applicant's team met with the property owner on March 27, 2019. Response to comments were sent to the Planning Commission and the property owner on March 29, 2019. On April 1, 2019 additional comments were received and a response to comments went to the property owner and the Planning Commissioners on April 2, 2019.

The Planning Commission heard the project on April 3, 2019. After taking public testimony, the Planning Commission closed the public hearing and recommended approval of the project by a vote of 5-0.

Subsequent to the Planning Commission's action, minor clerical revisions have been made to the exhibits for the Plot Plan and Tentative Tract Map. For the Plot Plan, the exhibit was corrected to show emergency vehicle access only onto Los Alamos Road which is consistent with the Tentative Tract Map. This correction is shown on Attachment F. For the Tentative Tract Map, the notes have been updated to reflect the existing well that will be removed during construction. The updated Tentative Tract Map is shown on Attachment G.

As discussed in the updated EA for the MND, the additional analysis related to the existing well and residence would not alter any of the prior CEQA analysis, significance determinations, impacts or findings and would not trigger recirculation of the document.

Highway 79 Policy Area

The Project site is located within the Southwest Area Plan's Highway 79 Policy Area, which was created to address transportation infrastructure capacity within the policy area. Residential developments within this policy area are required to be consistent with Southwest Area Plan (SWAP) 9.2, and reduce their density by 9% from the midpoint of the density range of the applicable land use designation to achieve a reduction in traffic generated from the area. The project site is located in Community Development: Medium Density Residential. At 2-5 dwellings units per acre, this 9% reduction would require the proposed project to be limited to 39 dwelling units. However, SWAP 9.2 also provides that individual projects may exceed the General Plan

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STATE OF CALIFORNIA**

traffic model trip generation level if it can be shown that sufficient reductions have occurred on other projects. Certain Specific Plans and Tentative Tract Maps within the Highway 79 Policy Area have fully developed their residential component below the maximum allowed number of dwellings units allowed. County staff is maintaining a tracking sheet that identifies projects that have underdeveloped from what the General Plan and Highway 79 Policy Area would allow and has left excess capacity and a reduction in trips as well as identifying projects that have utilized this excess capacity for an up to date count on available capacity. Since Planning Commission, due to the request from the public on the Highway 79 Policy Area unit capacity tracking to ensure the up-to-date accuracy staff has revisited the calculations and has revised the amount of available units to 9 instead of 11, as was previously noted.

The project also includes two conditions of approval, among others, related to contributions in the amount of \$5,000 per every unit allowed as a result of the demonstrated unit reduction in other projects within the Highway 79 Policy Area. These contributions will go towards transportation infrastructure in the project's vicinity such as the planned extension for Clinton Keith Road. Previous projects in the Highway 79 Policy Area have also including similar conditions of approval. Half of the contribution will be made prior to map recordation, and the remaining portion to be made prior to grading.

Additionally, any reference to "secondary access" or "secondary/alter access" under the Fire Conditions of Approval should be replaced with "Emergency Vehicle Access (EVA)."

**Impact on Residents and Businesses**

The impacts of this project have been evaluated through the environmental review and public hearing process by the Planning Department and the Planning Commission.

**SUPPLEMENTAL:**

**Additional Fiscal Information**

All fees are paid by the applicant. There is no General Fund obligation.

**ATTACHMENTS:**

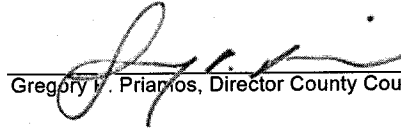
- A. UPDATED RESPONSE TO PUBLIC COMMENTS**
- B. PLANNING COMMISSION MINUTES**
- C. PLANNING COMMISSION MEMOS**
- D. PLANNING COMMISSION STAFF REPORT PACKAGE**
- E. INDEMNIFICATION AGREEMENT**
- F. PLOT PLAN NO. 26249**
- G. TENTATIVE TRACT MAP NO. 37294**
- H. ORDINANCE NO. 348.4909**
- I. ADDITIONAL COMMENTS RECEIVED**
- J. ERRATA MEMO**
- K. CONCEPTUAL GRADING PLAN**

SUBMITTAL TO THE BOARD OF SUPERVISORS COUNTY OF RIVERSIDE,  
STATE OF CALIFORNIA



Jason Farin, Senior Management Analyst

5/28/2019



Gregory V. Priamos, Director County Counsel

5/24/2019



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STATE OF CALIFORNIA        )  
  )  
COUNTY OF RIVERSIDE        )        ss

I HEREBY CERTIFY that at a regular meeting of the Board of Supervisors of said county held on June 4, 2019, the foregoing ordinance consisting of 2 Sections was adopted by the following vote:

AYES:                   Jeffries, Spiegel, Washington, Perez and Hewitt  
NAYS:                   None  
ABSENT:                 None

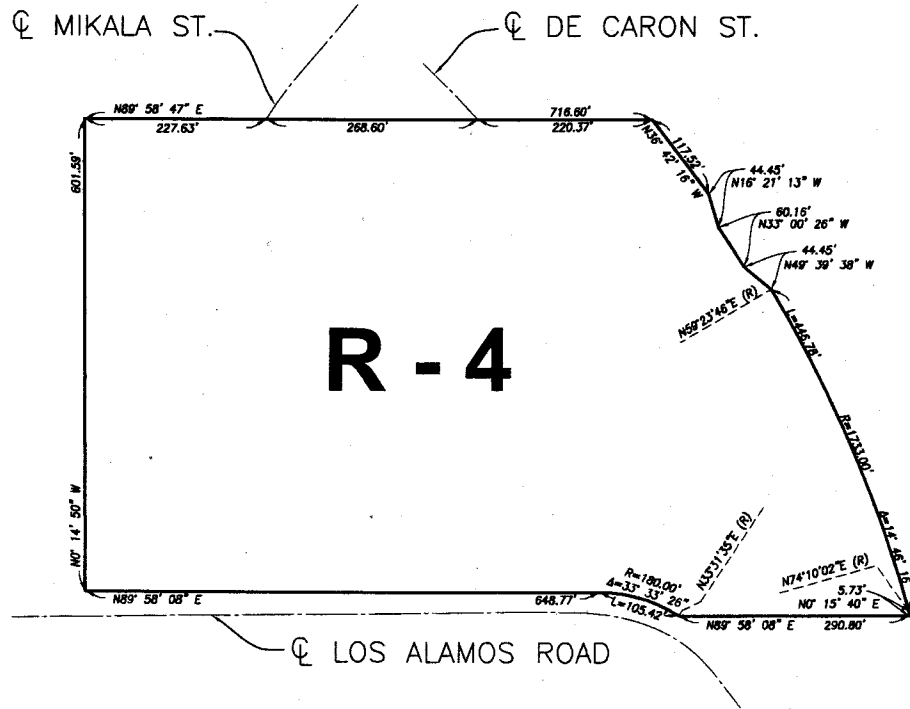
DATE:           June 4, 2019

KECIA HARPER-IHEM  
Clerk of the Board  
BY: *[Signature]*  
Deputy

SEAL

Item 21.2

RANCHO CALIFORNIA AREA  
 SEC. 31 T.6S., R.2W., S.B.B. & M.

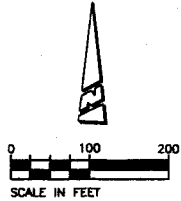


**R - 4**

R-4

PLANNED RESIDENTIAL

MAP NO. 2.2439  
 CHANGE OF OFFICIAL ZONING PLAN  
 AMENDING  
 MAP NO. 2 ORDINANCE 348  
 CHANGE OF ZONE CASE NO. 7937  
 ADOPTED BY ORDINANCE NO. 348.4909  
 DATE: \_\_\_\_\_



RIVERSIDE COUNTY BOARD OF SUPERVISORS

APNS: 480-100-009, 480-100-075 AND A PORTION OF 480-100-076.





OFFICE OF  
CLERK OF THE BOARD OF SUPERVISORS  
1st FLOOR, COUNTY ADMINISTRATIVE CENTER  
P.O. BOX 1147, 4080 LEMON STREET  
RIVERSIDE, CA 92502-1147  
PHONE: (951) 955-1060  
FAX: (951) 955-1071

KECIA R. HARPER  
Clerk of the Board of Supervisors

KIMBERLY A. RECTOR  
Assistant Clerk of the Board

June 12, 2019

THE PRESS ENTERPRISE  
ATTN: LEGALS  
P.O. BOX 792  
RIVERSIDE, CA 92501

TEL: (951) 368-9225  
E-MAIL: [legals@pe.com](mailto:legals@pe.com)

RE: ADOPTION OF ORDINANCE NO. 348.4909

To Whom It May Concern:

Attached is a copy for publication in your newspaper for **ONE (1) TIME** on **Tuesday, June 18, 2019.**

We require your affidavit of publication immediately upon completion of the last publication.

Your invoice must be submitted to this office, **WITH TWO CLIPPINGS OF THE PUBLICATION.**

NOTE: PLEASE COMPOSE THIS PUBLICATION INTO A SINGLE COLUMN FORMAT.

Thank you in advance for your assistance and expertise.

Sincerely,

*Karen Barton*

Board Assistant to:  
KECIA R. HARPER, CLERK OF THE BOARD

BOARD OF SUPERVISORS OF THE COUNTY OF RIVERSIDE, STATE OF CALIFORNIA

ORDINANCE NO. 348.4909

AN ORDINANCE OF THE COUNTY OF RIVERSIDE

AMENDING ORDINANCE NO. 348 RELATING TO ZONING

The Board of Supervisors of the County of Riverside ordains as follows:

Section 1. Section 4.1 of Ordinance No. 348, and official Zoning Plan Map No. 2, as amended, are further amended by placing in effect in the Rancho California Area, the zone or zones as shown on the map entitled "Change of Official Zoning Plan Amending Ordinance No. 348, Map No. 2.2439, Change of Zone Case No. 7937" which map is made a part of this ordinance.

Section 2. This ordinance shall take effect 30 days after its adoption.

Kevin Jeffries, Chairman of the Board

I HEREBY CERTIFY that at a regular meeting of the Board of Supervisors of said County, held on **June 4, 2019**, the foregoing Ordinance consisting of two (2) sections was adopted by said Board by the following vote:

AYES: Jeffries, Spiegel, Washington, Perez and Hewitt  
NAYS: None  
ABSENT: None

Kecia R. Harper, Clerk of the Board  
By: Karen Barton, Board Assistant



CALL (951) 368-9222  
EMAIL legal@pe.com

# THE PRESS-ENTERPRISE

DATE	ORDER NUMBER	PO Number	PRODUCT	SIZE	Amount
6/18/19	0011282568		PE Riverside	3 x 39 Li	152.10

Invoice text: Adoption of Ord. No. 348.490 <sup>19</sup>

*Planning  
6/4/19 21.2*

Placed by: Karen Lynn Barton

## Legal Advertising Memo Invoice

BALANCE DUE
152.10

SALES/CONTACT INFORMATION		ADVERTISER INFORMATION		
NAME	BILLING DATE	BILLED ACCOUNT NUMBER	ADVERTISER/CLIENT NUMBER	ADVERTISER/CLIENT NAME
Nick Eller 951-368-9229	06/18/2019	5209148	5209148	BOARD OF SUPERVISORS



## THE PRESS-ENTERPRISE

### Legal Advertising Memo Invoice

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06/18/2019	5209148	5209148
BALANCE DUE	ORDER NUMBER	TERMS OF PAYMENT
152.10	0011282568	DUE UPON RECEIPT

BILLING ACCOUNT NAME AND ADDRESS

REMITTANCE ADDRESS

BOARD OF SUPERVISORS  
COUNTY OF RIVERSIDE  
'PO BOX 1147'  
RIVERSIDE, CA 92502

CALIFORNIA NEWSPAPER PARTNERSHIP  
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Colorado Springs, CO 80962-5210

# THE PRESS-ENTERPRISE

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Riverside, CA 92507  
951-684-1200  
951-368-9018 FAX

## PROOF OF PUBLICATION (2010, 2015.5 C.C.P)

Publication(s): The Press-Enterprise

### PROOF OF PUBLICATION OF

Ad Desc.: Adoption of Ord. No. 348.4904 /

I am a citizen of the United States. I am over the age of eighteen years and not a party to or interested in the above entitled matter. I am an authorized representative of THE PRESS-ENTERPRISE, a newspaper in general circulation, printed and published daily in the County of Riverside, and which newspaper has been adjudicated a newspaper of general circulation by the Superior Court of the County of Riverside, State of California, under date of April 25, 1952, Case Number 54446, under date of March 29, 1957, Case Number 65673, under date of August 25, 1995, Case Number 267864, and under date of September 16, 2013, Case Number RIC 1309013; that the notice, of which the annexed is a printed copy, has been published in said newspaper in accordance with the instructions of the person(s) requesting publication, and not in any supplement thereof on the following dates, to wit:

**06/18/2019**

I certify (or declare) under penalty of perjury that the foregoing is true and correct.

Date: June 18, 2019  
At: Riverside, California



Legal Advertising Representative, The Press-Enterprise

BOARD OF SUPERVISORS  
COUNTY OF RIVERSIDE  
PO BOX 1147  
RIVERSIDE, CA 92502

Ad Number: 0011282568-01

P.O. Number:

### Ad Copy:

BOARD OF SUPERVISORS OF THE COUNTY OF RIVERSIDE,  
STATE OF CALIFORNIA

ORDINANCE NO. 348.4909

AN ORDINANCE OF THE COUNTY OF RIVERSIDE

AMENDING ORDINANCE NO. 348 RELATING TO ZONING

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Section 1. Section 4.1 of Ordinance No. 348, and official Zoning Plan Map No. 2, as amended, are further amended by placing in effect in the Rancho California Area, the zone or zones as shown on the map entitled "Change of Official Zoning Plan Amending Ordinance No. 348, Map No. 2.2439, Change of Zone Case No. 7937" which map is made a part of this ordinance.

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Kevin Jeffries, Chairman of the Board

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AYES: Jeffries, Spiegel, Washington, Perez and Hewitt  
NAYS: None  
ABSENT: None

Kecia R. Harper, Clerk of the Board  
By: Karen Barton, Board Assistant

6/18

April 1, 2019  
(updated April 4, 2019)

Dionne Harris  
Riverside County Planning Department  
P.O. Box 1409  
Riverside, CA 92502-1409

RE: County of Riverside Environmental Assessment Number 43201 (TR37294, CZ07937, PP26249)

Dear Ms. Harris:

Thank you for providing the additional letter submitted to the planning department on March 31, 2019 by Ms. Webster regarding the Los Olivos project (EA43210 – TR37294). As the project biologist, below are my responses and clarifications to Ms. Webster's additional comments. Ms. Webster's initial comments are in italics; our initial responses are in bold; Ms. Webster's additional comments are in red italics; and, our additional responses are in blue bold. After reviewing the comments provided to-date, including those provided herein and hearing the testimony during the Planning Commission public hearing on April 3, 2019, none of the comments or information constitute significant new information and none provide substantial evidence that there are material errors about the project site or its environs as described in the Initial Study/EA or the project technical studies.

**Initial Response: This response letter will address each of the comments individually below; however, there are a few broad issues that need to be addressed:**

- **First, the Environmental Assessment/Mitigated Negative Declaration (CEQA Document) is not the project applicant's document. It is the County's document that they represent the independent judgement of the County in determining compliance with CEQA.**
- **Secondly, the County and RCA are responsible for implementing and enforcing the terms of the MSHCP. In this particular case, the RCA determined that the project was consistent with the MSHCP requirements. Although the Wildlife Agencies' letter, dated March 5, 2018, disagreed with the RCA's conclusion, further discussions and negotiations between the Wildlife Agencies, the County and the RCA were held at the RCA's office on March 20, 2018 and May 2, 2018 which resulted in the determination that the project is in fact consistent with the MSHCP requirements.**
- **Thirdly, none of the comments require revisions to the CEQA document.**
- **Lastly, it should be noted that a portion of the property is not with a conservation Cell Group.**

Reply: *First, I agree.*

*Secondly, I agree that the County and RCA are responsible, and that the RCA made the determination that this project was consistent with the MSHCP. I disagree with that determination, which was based in large part on inaccurate information provided in JPR #17-10-02-01. While I am glad to hear that the RCA, County and Wildlife Services met for negotiations, there is no information in EA 43201 to indicate whether accurate information about pending RCA purchases was ever disclosed to or discussed with the Wildlife Services (or RCTLMA, or Dudek), or whether or not the Services eventually agreed with the RCA's determination. Nothing in the record disputes or retracts the Wildlife Services' arguments.*

*Thirdly, revisions to the CEQA documents ARE REQUIRED. CEQA requires accurate information. A negative declaration is inappropriate where the agency has failed to provide an accurate project description or to gather information and undertake an adequate environmental analysis. JPR # 17-10-02-01 was flawed and inaccurate. EA 43201 fails to provide an accurate project description; egregiously so, in describing conditions south of the project site, where the world ends at Los Alamos Road and existing rural residences and conservation lands are all omitted.*

*Lastly, the entire property is within the MSHCP area; the portion that "is not with a conservation Cell Group" is in Criteria Cell 5572.*

**Second Response:** The project went through the HANS process as required for a property located within an MSHCP Cell Criteria Area. JPR #17-10-02-01 was based on accurate information that was available at the time of the MSHCP Consistency Review. The HANS application was submitted in June 2017, over a year before the RCA acquired the property to the south of Los Alamos. The acquisition of a parcel by the RCA subsequent to the HANS process for the project does not invalidate the conclusions of the formal HANS review.

Even with the conservation of the property to the south, the conclusion that the entire project site is not identified for conservation within Cell Group Z or Core 2 and that the project does not include any habitat or plant species, other than the riparian area on the easterly portion of the site that is being avoided, that would further the goals of Cell Group Z or the overall MSHCP Reserve Assembly is still the same. The riparian drainage area is being avoided as part of the proposed development.

The CEQA document prepared for the project provides an accurate description of the existing project area conditions at the time of the analysis. No further analysis is required and no change to the CEQA document is required.

*Comment:* 1. The Applicant states, "The project site is on the easterly edge of Cell Group Z, whereas the conservation goals call for conservation on the westerly side" (first bullet, page 17 EA 43201). This is a false statement of MSHCP Plan goals which, in fact are stated as "Conservation within this Cell Group will range from 75%-85% of the Cell Group focusing in the western portion of the Cell Group". The MSHCP Plan does not exempt Eastern portions of Cell Group Z from MSHCP acquisition.

**Initial Response:** During the RCA Joint Project Review (JPR), the RCA made the following determination:

"The proposed project is located within the eastern side of Cell Group Z adjacent to existing residential development to the north and east that is extending along Clinton Keith Road. In addition, the proposed project is east of Warm Springs Creek and Proposed Core 2. The majority of the conservation already existing within Cell Group Z is located within the center of the Cell Group and comprises the majority of Proposed Core 2. This core is described as extending west from the already conserved land to encompass the western side of the Cell Group. Development of the proposed project is located east of the existing conservation and is not expected to impede the functions of Proposed Core 2 due to its adjacency to other development...Finally, the project site does not impact riparian scrub, woodland or forest, chaparral, coastal sage scrub, or grassland. Adjacent to the project site to the east is riparian woodland; however, this riparian habitat will be avoided, allowing some function as a corridor leading to Proposed Constrained Linkage 18, which lies southeast of the Cell Group and ultimately connects with Warm Springs Creek. However, north of Clinton Keith Road the drainage has been heavily altered as open space in Spencer's Crossing and was not intended to connect to other conservation to the north... Given the location of the project site and its lack of physical connection to existing conservation within Proposed Core 2, and that the project site would not contribute to this Reserve feature, development of the proposed project would not further impede the conservation goals for Proposed Core 2, or cause fragmentation issues. Furthermore, the applicable portions of the project site that contribute to Proposed Constrained Linkage 18 are being avoided by the proposed project. Development of the proposed project would not further impede the conservation goals for this linkage or cause additional fragmentation issues. Based on this discussion, development of the proposed project site is consistent with the Reserve Assembly goals of the MSHCP."

Although conservation can take place elsewhere within Cell Group Z and the MSHCP does not exempt the eastern portion of the Cell Group from conservation, the RCA found that, based upon the project site's existing condition and location relative to existing conservation lands, the site would not contribute to the conservation goals of the Cell Group, other than the riparian drainage area, which is being avoided by the development. No change to the CEQA document is required.

*Reply: The comment stands. The project is not exempt from MSHCP acquisition based on its location within the Cell Group, as implied in EA 43201.*

**Second Response:** The project is not exempt from MSHCP acquisition based on its location; however, the RCA concluded that the project would not contribute to the conservation goals for Cell Group Z or Core 2 due to a lack of appropriate habitat and the lack of physical connection to existing conservation within Proposed Core 2. Based upon the RCA's JPR determination, the development area on the project site does not support the vegetative communities toward which MSHCP conservation should be directed, as identified in the Cell Group Criteria. Further, the portion of the site that would contribute to Constrained Linkage 18 is being avoided by the proposed project. No further analysis is required and no change to the CEQA document is required.

Comment: 2. The Applicant states, "The project site is disturbed, lacks habitat—other than a riparian/riverine area that would be preserved as part of the project—and is mostly surrounded by developed permanent improvements and residences" (second bullet, page 17 EA 43201). This argument fails to account for the ability of agricultural land to be restored once farming ceases (e.g., JPR #16-04-20-01 page 2), which is why RCA is able to effectively proceed towards its conservation goals, by acquiring agricultural and rural residential land (such as the 36.57 acres just south of the project, acquired by RCA on June 7, 2018 - see figure and further discussion below).

**Initial Response:** The acquisition of the lands to the south would contribute to the conservation goals of Cell Group B, not Cell Group Z in which the project is located. Conservation within Cell Group B "focus on coastal sage scrub, grassland, riparian scrub, woodland and forest habitat and agricultural land." Conservation within Cell Group Z "focus on riparian scrub, woodland and forest habitat along Warm Springs Creek and adjacent chaparral, coastal sage scrub and grassland habitat." While Conservation within Cell Group B calls for agricultural land, Cell Group Z (in which the project site is located) does not. This would account for the RCA's decision to acquire the lands located within Cell Group B to the south. However, as stated above, the RCA, through the JPR process, determined that the subject project site would not contribute to the conservation goals of Cell Group Z. No change to the CEQA document is required.

Reply: The comment stands. The goal of the MSHCP is to assemble a functional Reserve System. Connectivity throughout the Reserve is essential for Reserve function (e.g., between Cell Groups Z and B). At present, existing rural/agricultural properties, all of which can be described as "disturbed" land that "lacks habitat", are the only lands available for conservation acquisition in the eastern central portion of Core Area 2. This includes Criteria Cells 5570 (which includes this project), 5671, and to a lesser degree 5672. Acquisition and restoration of such properties is critical to Reserve Assembly in this area.

**Second Response:** The goal of the MSHCP is to assemble a functional Reserve System. The MSHCP is tasked with assembling additional Reserve Lands over time that must be in a configuration and contain key Vegetation Communities that provide for the Conservation of Covered Species. The Additional Reserve Lands within the Criteria Area need to support the habitats necessary to achieve the conservation goals for the Covered Species. Acquisition priorities at any point in time need to be appropriately focused on conserving parcels and Vegetative Communities needed to meet Covered Species conservation goals. The applicable portions of the project site that contribute to the conservation goals of the Criteria Area, Core 2, and Proposed Constrained Linkage 18 are being avoided by the proposed project. Acquisition of the remainder of the proposed project site by the RCA would not provide any of the habitat described for conservation in Cell Group Z or Core 2 that would contribute to the goals of the overall Reserve Assembly. No further analysis is required and no change to the CEQA document is required.

Comment: 3. EA 43201 and all supporting documents in the file placed before the Riverside County Planning Commission fail to even mention:



A. the extensive RCA holdings just south of the project (including and on either side of the parcel marked "RCA" in the figure above);

**Initial Response:** As stated above, the acquisition of the lands to the south contribute to the conservation of Cell Group B, not Cell Group Z in which the project site is located. No change to the CEQA document is required.

*Reply:* The comment stands. This Response demonstrates a fundamental lack of understanding of the MSHCP Reserve Assembly process and goals (see Reply to Comment 2, above). CEQA demands current and accurate information. EA 43201 is inadequate and should be rejected.

**Second Response:** As stated in the initial response, conservation within Cell Group Z focuses on "riparian scrub, woodland and forest habitat along Warm Springs Creek and adjacent chaparral, coastal sage scrub and grassland habitat." The proposed development area within the project site does not contain the habitats targeted for conservation within the Cell Criteria Area. The onsite riparian area that will contribute to the conservation goals of the Criteria Area, Core 2, and Proposed Constrained Linkage 18 is being avoided by the proposed project. The CEQA document prepared for the project provides an accurate description of the existing project area conditions at the time of the analysis. No further analysis is required and no change to the CEQA document is required.

B. that County Transportation owns a 2 acre parcel between the project and RCA sites (labeled TLMA on Figure), acquired as noise mitigation for Clinton Keith Road;

**Initial Response:** Based on a title review, the County transportation department does not currently own the above-mentioned parcel. Even if the County transportation department owned this parcel, it is not related to the project, is not being acquired as part of the MSHCP, and is entirely related to the County's construction of Clinton Keith Road. No change to the CEQA document is required.

*Reply:* Acquisition of this parcel by TLMA was approved 4 years ago (2015). Certainly the western portion of the site, abutting and partially including the watercourse, should be available for RCA acquisition, linking the project site directly to the RCA land to the south.

**Second Response:** Although the County is in the process of acquiring the TLMA parcel, there is no current plan to include this property in the MSHCP Reserve Assembly. The property is being acquired to address and mitigate for impacts created by the Clinton Keith Road extension. It is possible that a portion of the site could be acquired by the RCA in the future; however, there is currently no plan by the County Transportation Department to do so. No further analysis is required and no change to the CEQA document is required.

C. that the eastern side of the project is part of the same watercourse and wetland on these two unmentioned contiguous properties (TLMA and RCA), feeding into French Valley Creek (aka, Constrained Linkage 18 wildlife corridor, to the east).

**Initial Response:** During the RCA Joint Project Review (JPR), the RCA made the following determination:

**“Adjacent to the project site to the east is riparian woodland; however, this riparian habitat will be avoided, allowing some function as a corridor leading to Proposed Constrained Linkage 18, which lies southeast of the Cell Group and ultimately connects with Warm Springs Creek. However, north of Clinton Keith Road the drainage has been heavily altered as open space in Spencer’s Crossing and was not intended to connect to other conservation to the north. It should be noted that the proposed Clinton Keith Road expansion project will ultimately remove much of the riparian vegetation in this area... Given the location of the project site and its lack of physical connection to existing conservation within Proposed Core 2, and that the project site would not contribute to this Reserve feature, development of the proposed project would not further impede the conservation goals for Proposed Core 2, or cause fragmentation issues. Furthermore, the applicable portions of the project site that contribute to Proposed Constrained Linkage 18 are being avoided by the proposed project. Development of the proposed project would not further impede the conservation goals for this linkage or cause additional fragmentation issues.”**

**Per the CEQA document, no project activities would occur within the onsite drainage prior to, during, and following construction, including grading, manufactured slopes, fuel modification, and staging. No change to the CEQA document is required.**

*Reply: The comment stands. The JPR was flawed by reliance on false information. There is no barrier to connectivity between the project site and conservation lands.*

**Second Response:** The proposed project site is surrounded by roadways with dense development to the north and east. South and west of the project site are primarily large lot single family homes and scattered undeveloped parcels. The project is bound on the south by Los Alamos Road and rural residential parcels south of Los Alamos that include fencing, domesticated animals, homes, and other structures. The JPR for the project stated that “[t]he majority of the conservation already existing within Cell Group Z is located within the center of the Cell Group and comprises the majority of Proposed Core 2. This core is described as extending west from the already conserved land to encompass the western side of the Cell Group. Development of the proposed project is located east of the existing conservation and is not expected to impede the functions of Proposed Core 2 due to its adjacency to other development.” The onsite riparian area, which does provide connectivity to Core 2 by way of Proposed Constrained Linkage 18, is being avoided by the proposed project. The remainder of the property does not contain habitat that would contribute to the goals of the overall Reserve Assembly.

**As previously stated, the acquisition of the property to the south of the project site by the RCA subsequent to the HANS process for the project does not invalidate the conclusions of the formal HANS review. The CEQA document prepared for the project provides an accurate description of the existing**

project area conditions at the time of the analysis. No further analysis is required and no change to the CEQA document is required.

*Comment:* The Applicant's failure to describe land use and geographical elements south of the project renders EA 43201 incomplete, and therefore inadequate for approval of the proposed Mitigated Negative Declaration by the Commission. Furthermore, Applicant's failure to present accurate information on existing MSHCP conservation lands (freely available on the RCA website), renders unfounded their proclamations such as: "The project site lacks a physical connection to an existing MSHCP conservation area" (third bullet, page 17 EA 43201).

**Initial Response:** As stated above, the acquisition of the lands to the south contribute to the conservation of Cell Group B, not Cell Group Z in which the project site is located. Furthermore, during review of the proposed project, no conservation lands existed to the south as they were not acquired by the RCA until June 2018.

*Reply:* The comment stands. Negotiations for the purchase of the RCA land to the south commenced on or before January 2017, 10 months before the JPR Application for this project was filed, and 13 months before it was reviewed and approved by the RCA. The land should have been designated "proposed conservation" in the JPR, not "proposed development" (as proved by the existing conditions as of June 7, 2018. Furthermore, Agency approval is not at issue; approval of EA 43201 by the Board of Supervisors is required by law to be based on current and accurate information, which I am providing here. False information cannot be used as a basis for legislative approval, even if it is provided by an Agency.

**Second Response:** The project filed its HANS Applications in June of 2017. The JPR is part of the overall HANS process. The RCA might have been negotiating acquisition of the property to the south of Los Alamos at that time; however, the acquisition was not finalized until May of 2018. The project went through the HANS process as required when a property is located within a MSHCP Criteria Area. JPR #17-10-02-01 was based on accurate information at the time of the MSHCP Consistency Review. Subsequent to the completion of the HANS process for the project, the RCA acquired the property to the south of Los Alamos Road. As previously stated, the acquisition of the property to the south of the project site by the RCA subsequent to the HANS process for the project does not invalidate the conclusions of the formal HANS review. The CEQA document prepared for the project provides an accurate description of the existing project area conditions at the time of the analysis. No further analysis is required and no change to the CEQA document is required.

*Comment:* 4. The Applicant states, "The project site would not contribute or further impede the conservation goals for Cell Group Z, or cause fragmentation issues" (fourth bullet, page 17 EA 43201). To the contrary, the site would make a positive contribution toward MSHCP goals through connectivity, as noted above. Furthermore, a contribution for conservation from the project site would unquestionably help the RCA progress towards goals for Cell Group Z (75%-85% conservation). Exemption of this project from MSHCP necessarily impedes RCA's conservation goals.

**Initial Response:** As previously stated, the RCA found that, based upon the project site's existing condition and location relative to existing conservation lands, the site has would not contribute to the conservation goals of the Cell Group, other than the riparian drainage area, which is being avoided by the development). Therefore, the CEQA document is correct in stating that the project would not impede the conservation goals for Cell Group Z. No change to the CEQA document is required.

*Reply: The comment stands. Inclusion of the eastern portion of the site, east of the olives (Area B in the CKR Addendum to SEIR 2015, 03-28part20.pdf) will contribute to MSHCP goals with respect to acreage, habitat and linkage.*

**Second Response:** As previously stated, the onsite riparian area, which does provide connectivity to Core 2 by way of Proposed Constrained Linkage 18, is being avoided by the proposed project. The remainder of the property does not contain habitat that would contribute to the goals of the overall Reserve Assembly. No further analysis is required and no change to the CEQA document is required.

*Comment: The MSHCP Consistence Analysis discusses, at length, how difficult is to meet these goals. Applicant's solution is not to try; they propose to not give even 1 square foot of wetland to the MSHCP.*

**Initial Response:** As previously stated, no project activities would occur within the onsite drainage prior to, during, and following construction, including grading, manufactured slopes, fuel modification, and staging. The entire riparian area on the eastern portion of the property is being conserved as open space. No change to the CEQA document is required.

*Reply: The comment stands. Project proponents are not willing to donate land to MSHCP, preferring to put houses in the flood plain.*

**Second Response:** As previously stated, the onsite riparian area, which does provide connectivity to Core 2 by way of Proposed Constrained Linkage 18, is being avoided by the proposed project. The remainder of the property does not contain habitat that would contribute to the goals of the overall Reserve Assembly. Further, no homes are proposed to be built within a floodplain. No further analysis is required and no change to the CEQA document is required.

*Comment: Meeting the Reserve Assembly goal in Cell Group Z may not be possible, but this is not a rationale for exempting this project from MSHCP participation. Rather, as the Wildlife Services wrote in their comments, "It seems therefore that the entire project area should come into conservation" (see letter from the Wildlife Services re JPR # 17-10-02-01, dated March 5, 2018, page 2.*

**Initial Response:** As previously stated, although the Wildlife Agencies' letter, dated March 5, 2018, disagreed with the RCA's conclusion, further discussions and negotiations with the County, RCA, and Wildlife Agencies resulted in the determination that the project is in fact consistent with the MSHCP requirements. In addition, the project is required to pay MSHCP fees to allow the purchase of other

valuable conservation property that will actually contribute to the MSHCP conservation goals. No change to the CEQA document is required.

*Reply: The comment stands. The County/Applicant continue to debase the biological quality of the project site, and to discount the opinions of experts who recognize this value.*

**Second Response:** The County biologist, the biologists for the RCA and the project applicant's biologist all concur that the biologically sensitive portions of the project site are being avoided by the proposed development. The project applicant fully considered the biology of the site during the design process. Prior to the project site design, biological technical studies were completed for the project site to determine where the biologically sensitive portions of the site were located. Using best practices in the industry, the project site was designed to avoid all biologically sensitive areas on the project site. The project design relied upon expert opinion to avoid any impacts to biological resources on the project site. No further analysis is required and no change to the CEQA document is required.

5. The Applicant states, "Conservation goals could still be met in the Area Plan and/or between Area Plans within a single Rough Analysis Unit depending on future assembly of conservation area or subject to a Minor Amendment or Criteria Refinement to conservation criteria" (sixth bullet, page 17 EA 43201). Reliance on some future adjustment to conservation criteria is inappropriate. The Wildlife Services specifically "request(ed) that either a Criteria Refinement for Cell Group Z be completed or the mechanism for adjusting Proposed Core 2 and or Cell Group Z be identified and implemented prior to project approval" (see Wildlife Services letter's second page, shown on page 5 of this document).

**Initial Response:** As previously stated, although the Wildlife Agencies' letter, dated March 5, 2018, disagreed with the RCA's conclusion, further discussions and negotiations with the County, RCA, and Wildlife Agencies resulted in the determination that the project is in fact consistent with the MSHCP requirements. No change to the CEQA document is required.

*Reply: The comment stands. The Planning Commission has the letter form the Wildlife Services. The RCA's determination was based in large part on inaccurate information provided in JPR # 17-10-02-01. There is no information in EA 43201 to indicate whether accurate information about pending RCA purchases was ever disclosed to the Wildlife Services. County has failed to exercise due diligence in updating the project file, to allow the Planning Commission to see existing conditions which render their recommendation to promote urbanization along the rural residential/open-space Los Alamos Road neighborhood.*

**Second Response:** As previously stated, the project filed its HANS Applications in June of 2017. The JPR is part of the overall HANS process. The RCA might have been negotiating acquisition of the property to the south of Los Alamos at that time; however, the acquisition not finalized until May of 2018. JPR #17-10-02-01 was based on accurate information at the time of the MSHCP Consistency Review.

The acquisition of the property to the south of the project site by the RCA subsequent to the HANS process for the project does not invalidate the conclusions of the formal HANS review. Even with the

conservation of the property to the south, the conclusion that the entire project site is not identified for conservation within Cell Group Z or Core 2 and that the project does not include any habitat or plant species, other than the riparian area on the easterly portion of the site that is being avoided, that would further the goals of Cell Group Z or the overall MSHCP Reserve Assembly is still the same. Further, the onsite riparian drainage area, which does provide connectivity to Core 2 by way of Proposed Constrained Linkage 18, is being avoided by the proposed project.

The CEQA document prepared for the project provides an accurate description of the existing project area conditions at the time of the analysis. No further analysis is required and no change to the CEQA document is required.

*The Wildlife Services "disagree with the RCA's conclusion that the proposed Project development is consistent with MSHCP Reserve Assembly requirements" (see letter from Wildlife Services, included as pages 4-5 of this document). I am concerned that the Wildlife Services review of this project is in opposition to RCA's approval, and that their concerns and requests have gone unresolved and unanswered; they should be addressed in EA 43201. Ignoring the Wildlife Services could jeopardize MSHCP status as an approved conservation plan that meets state and federal standards.*

**Response:** As previously stated, although the Wildlife Agencies' letter, dated March 5, 2018, disagreed with the RCA's conclusion, but discussions with the Wildlife Agencies regarding various issues with this project and the entire program resulted in the determination that this project is in fact consistent with the MSHCP requirements. No change to the CEQA document is required.

*Reply: The comment stands. The Planning Commission has received no evidence refuting the Wildlife Services recommendations regarding this project. The RCA's determination relied on false information. The CEQA document is required to be accurate; it is not.*

**Second Response:** As previously stated, the CEQA document prepared for the project provides an accurate description of the existing project area conditions at the time of the analysis. No further analysis is required and no change to the CEQA document is required.

Please feel free to contact me via email at [shawn@hernandezenvironmental.com](mailto:shawn@hernandezenvironmental.com) or by telephone at 951.334.6219 if you have any questions.

Sincerely,



Shawn Gatchel-Hernandez  
Principal Regulatory Specialist

April 9, 2019

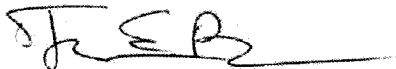
Ms. Dionne Harris, M. Arch  
Urban Regional Planner II  
County of Riverside Department of Planning  
4080 Lemon Street, 12<sup>th</sup> Floor  
Riverside, CA

RE: EA 43201 / TR 37294 – Further Hydrology and Engineering Comments

Dear Ms. Harris:

After hearing the testimony during the Planning Commission public hearing on April 3, 2019, and reviewing the previous response and comment letters regarding hydrology and cumulative impacts again, none of the information submitted to the County and presented prior to and during the Planning Commission constitutes significant new information, and none provide substantial evidence that there are material errors about the project site or its environs as described in the CEQA document or the technical studies. All of the information, including the attached Existing HEC-RAS Section Map (Exhibit A), and the TR 37924 and CKR HEC-RAS Section Map (Exhibit X-1), were referenced and analyzed as part of the 2018 Preliminary Drainage Report, which was incorporated by reference into the Initial Study/EA prepared for the project. Both of these exhibits were also included in the presentation to the Planning Commission and discussed at length. Therefore, no revisions to the prior analyses are necessary.

Sincerely,



Tom Braun, MS, PE  
Principal



**PLANNING COMMISSION  
MINUTE ORDER  
APRIL 3, 2019**

**I. AGENDA ITEM 3.1**

**CHANGE OF ZONE NO. 7937, TENTATIVE TRACT MAP NO. 37294 and PLOT PLAN NO. 26249 – Intent to Adopt a Mitigated Negative Declaration – EA43021 – Applicant: Newland Homes, LLC – Engineer: Proactive Engineering – Third Supervisorial District – Rancho California Zoning Area – Southwest Area Plan – Community Development: Medium Density Residential (CD-MDR) (2 – 5 dwelling units per acre) – Rural: Rural Residential (R-RR) – Location: Northerly of Los Alamos Road, southerly of De Caron Street, easterly of Suzi Reid Way, and westerly of Briggs Road – 12.5 Gross Acres – Zoning: Rural Residential (R-R).**

**II. PROJECT DESCRIPTION:**

The **Change of Zone No. 7937** is a proposal to change the zoning classification from Rural Residential (R-R) to Planned Residential (R-4). The **Tentative Tract Map No. 37294** is a proposal for a Schedule "A" subdivision of 12.5 gross acre area into 48 single-family residential lots, ranging in size from 5,017 to 7,998 sq. ft., and also includes one (1) water quality basin, and four (4) open space lots consisting of 3.6 acres. The **Plot Plan No. 26249** is a proposal for a development plan with elevations and floorplans on 48 lots for the Tentative Tract Map No. 37294. Continued from March 20, 2019.

**III. MEETING SUMMARY:**

The following staff presented the subject proposal:

Project Planner: Dionne Harris at (951) 955-6836 or email at [dharris@rivco.org](mailto:dharris@rivco.org).

Spoke in favor:

Jeremy Krout, Applicant's Representative, EPD Solutions, Inc.

Tom Braun, Applicant's Representative, Proactive Engineering

Joe Castaneda, Applicant's Representative, JLC engineering

Spoke in opposition:

Cecelia Webster, Neighbor, 30255 Los Alamos Road, Murrieta, 92563

Corrin Greenfield, Neighbor, 36280 Liberty Road, Murrieta, 92563- did not speak, donated time

Nadav Joshua, Neighbor, 36280 Liberty Road, Murrieta, 92563- did not speak, donated time

No one spoke in a neutral position.

**IV. CONTROVERSIAL ISSUES:**

None.

**V. PLANNING COMMISSION ACTION:**

Public Comments: Closed

Motion by Commissioner Taylor-Berger, 2<sup>nd</sup> by Commissioner Shaffer

A vote of 5-0

The Planning Commission Recommend the Following Actions to the Board of Supervisors:

**ADOPT** a Mitigated Negative Declaration for Environmental Assessment No. 43021; and,

**TENTATIVELY** Approve Change of Zone No. 7937; and,

**APPROVE** Tentative Tract Map No. 37294; and,

**APPROVE** Plot Plan No. 26294, subject to the conditions of approval as modified at hearing.





**RIVERSIDE COUNTY**  
**PLANNING DEPARTMENT**

*Charissa Leach, P.E.*  
*Assistant TLMA Director*

**Memorandum**

**3.1**

**DATE:** March 28, 2019  
**TO:** Riverside County Planning Commission  
**FROM:** Dionne Harris, Project Planner  
**RE:** April 3, 2019, Planning Commission Agenda Item 3.1 – Change of Zone No. 7937, Tentative Tract Map No. 37294 and Plot Plan No. 26249.

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Attached are the responses to Cecelia Webster's comment letters that were previously provided to the Planning Commission at the March 20, 2019 hearing. The comments are again attached followed by the corresponding responses. These responses have been reviewed by the Riverside County Staff and are consistent with the analyses prepared for the project design, meet all requirements of the County, and the proposed conditions of approval.

**Attachments:**  
Letters, Exhibits, and Appendices

Riverside Office · 4080 Lemon Street, 12th Floor  
P.O. Box 1409, Riverside, California 92502-1409  
(951) 955-3200 · Fax (951) 955-1811

Desert Office · 77588 El Duna Court, Suite H  
Palm Desert, California 92211  
(760) 863-8277 · Fax (760) 863-7040

March 13, 2019

Dionne Harris, M.Arch  
Urban Regional Planner II  
Riverside County Planning Department  
4080 Lemon Street, 12th Floor  
Riverside CA 92501

Re: EA 43021 and related documents in the file concerning water wells, groundwater and hydrology

Dear Ms. Harris,

Thank you for EA 43021 and related documents, which is due to be considered by the Riverside County Planning Commission in Public Hearing on March 20, 2019. I present here my review of those documents and earlier key material in the file confined to water wells, groundwater and hydrology, which describe how EA 43021 fails to support a Mitigated Negative Declaration, contrary to Applicants' request in the Hearing Agenda. I urge the Commission to consider the errors, pertinent omissions and misleading representations, enumerated below, since they cover key areas in which the Initial Study is defective - key areas where this project, as proposed, WILL have a significant adverse environmental impact - and to deny the application for a Mitigated Negative Declaration.

**1. Applicant has failed to follow simple guidance on requirements for Project approvals from the Riverside County Planning Department, communicated on July 26, 2017. Most glaring are listed CONDITIONS OF APPROVAL that Applicant has failed to comply with:**

**1A: The FLOOD comments on Page 7 describe how the "stormwater runoff from".... "approximately 20 acres" flows into the project from the west. Yet EA 43021 cites a Drainage Report that fails to correctly identify the boundaries of this western watershed - instead analyzing drainage from only a portion of the true western watershed, and OMITTING drainage from parts of 4 multi-acre parcels south of Los Alamos Road (southwest of the project site) that contribute to flooding on properties north of Los Alamos Road. This material error is grounds for rejecting the Mitigated Negative Declaration.**

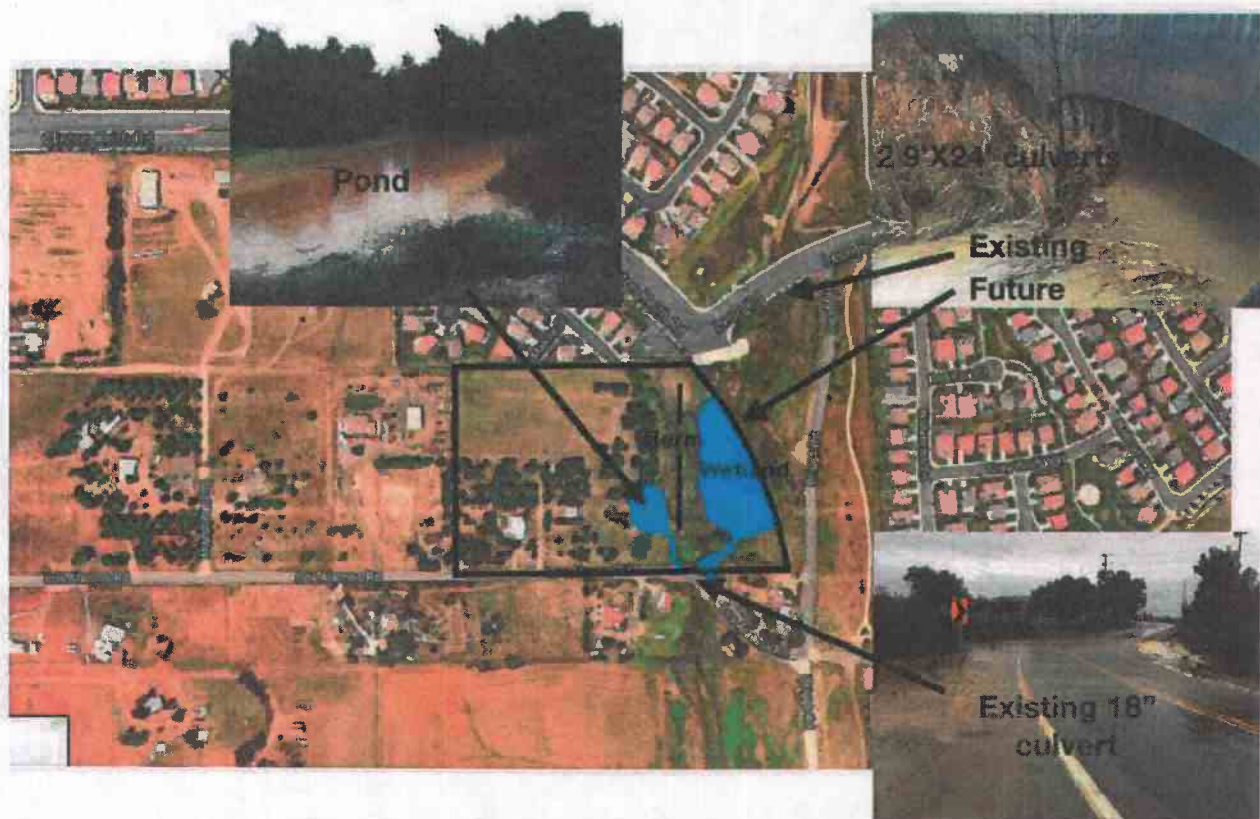
**1B: The HEALTH comments on Page 2 list a requirement to "properly locate and plot locations of all existing wells and onsite wastewater treatment systems for this project". Applicant declares in Tentative Tract Map No. 37294 before the Commission that "no existing water wells are located on-site or within sphere of influence" (Note 21) and "no known existing wells are on the property, or within 200 feet of property boundary" (Note 29). These are FALSE STATEMENTS, which if accepted by the County, threaten groundwater quality in the Murrieta/Temecula Groundwater Basin, in violation of State law - because there are multiple existing active and abandoned wells, and septic systems, on and neighboring the project site. Many of these wells are plainly visible from public roads; the most recent wells in the County can be**

identified on the County-maintained website. Therefore, the Planning Commission needs to support the County's responsibility to comply with State law by rejecting the proposed Mitigated Negative Declaration.

**2. The failure by the Applicant to address the Condition of Approval concerning existing water wells and septic tanks, described above in 1B, is compounded by unjustified judgments made in EA 43021 that the project will have a "Less than Significant Impact" on water quality (25g, page 40).** In fact, California's Water Laws clearly explain how wells must be constructed, abandoned etc. by exacting standards executed only by specially licensed professionals for the express purpose of minimizing degradation of groundwater quality - and so, the inexcusably false representations made by the Applicant regarding wells and septic systems are, in and of themselves, a substantial threat to groundwater quality. This consideration justifies rejecting the proposed Mitigated Negative Declaration.

**3. The Indemnification Agreement (see item 5 on Page 2 of the July 26, 2017 letter, referenced above, in item 1) improperly delegates the County's responsibility for management/oversight of wells in the County - since such delegation improperly protects the government at the expense of the governed, and institutionalizes a financial incentive to violate State Law.** The basic issue is that the County has the *permanent duty* to protect valuable groundwater resources by recognizing misdemeanors such as failure to abandon water wells according to the State's legal standards. The County needs to *demonstrably require* continued protection of public groundwater resources comprising the Murrieta/Temecula Groundwater Basin that hundreds of thousands of residents in the 3rd Supervisorial District benefit from. The County cannot pass on this responsibility to the perpetrator via an indemnity, since this abuse of discretion would necessitate the remedy of an appeal to the Water Board for the Board to assume direct management of well resources in the threatened area, presumably funded by fees the County collects for this purpose. I look forward to the Commission's and County Counsel's judgement on this matter, particularly since this threat is also relevant to wells on recently acquired public lands in our neighborhood, administered by RCTLMA and RCA.

**4. On page 3 of EA 43021 Applicants fail to identify a single environmental impact in the sphere of Hydrology/Water Quality that "would be potentially affected by this Project, involving at least one impact that is a potentially significant impact or less than significant with mitigation incorporated". This is an unjustified failure, made possible through a foundation of omitted hydrological features,** evident by critical review of the Applicant's defective submission that: "The site consists of relatively flat and gently sloping terrain with some hummocky mounds in the southeast portion of the site. In addition, the site contains one drainage feature that flows from north to south across the easternmost portion of the site" (EA 43021, page 2). In fact there are several drainage features that control movement of stormwater across and out of the project site - features that should have been described and considered in the Initial Study, including those identified in the following figure (discussed in text 4A through 4D):



4A. Missing from the Initial Study, but evident in Flood Control Topo Maps and plainly visible from surrounding roads, exists a significant detention basin south of the eastern-most line of olive trees (labeled “Pond”), which detains water from approximately 30 acres of watershed (i.e. the historic agricultural and current residential portions of the project site plus the 20 acres of watershed draining onto the project that are misunderstood by Applicant in point 1A, above).

4B. Missing from the Initial Study, but plainly visible from surrounding roads, is a substantial earthwork that runs north to south (labeled “berm”); the most substantial portion of the berm is evident in Flood Control Topo maps, to the east of the pond. The berm works in concert with the pond to, first, steer all stormwater collected from the aforementioned 30 acre watershed southward towards Los Alamos Road via a narrow channel (converging with creek water at the 18 inch culvert under Los Alamos Road under non-flooding conditions) and, second, by separating this stormwater from the Warm Springs Creek tributary and wetlands east of the berm.

4C. The Initial Study fails to recognize that Los Alamos Road at the SE corner of the project serves to detain stormwater on the project site, since the culvert is grossly undersized relative to creek flow even during and after average rainfall events, creating a significant detention basin north of Los Alamos Road, which frequently extends across the roadbed (see figure above; hence the “subject to flooding” roadway sign next to the project site).

EA 43021

4D. The applicant proposes to encroach on the floodplain of the creek at the eastern end of the project with housing tracts and a detention basin, but fails to describe how these proposed elements will displace a significant existing detention basin, identified in the figure above (“Wetland”), and thereby unreasonably avoids acknowledging obvious environmental impacts, notably increasing flooding downstream at Los Alamos Road and beyond.

These multiple omissions constitute non-compliance with CEQA, regarding the Initial Study’s determination of the nature and degree of impacts in the sphere of hydrological/water quality, and should be considered as grounds for rejecting the proposed Mitigated Negative Declaration.

**5. On page 40 of EA 43021, in checklist 25e) Applicants certify that the proposed project will have a less than significant impact by placing housing “within a ... flood hazard delineation map”.**

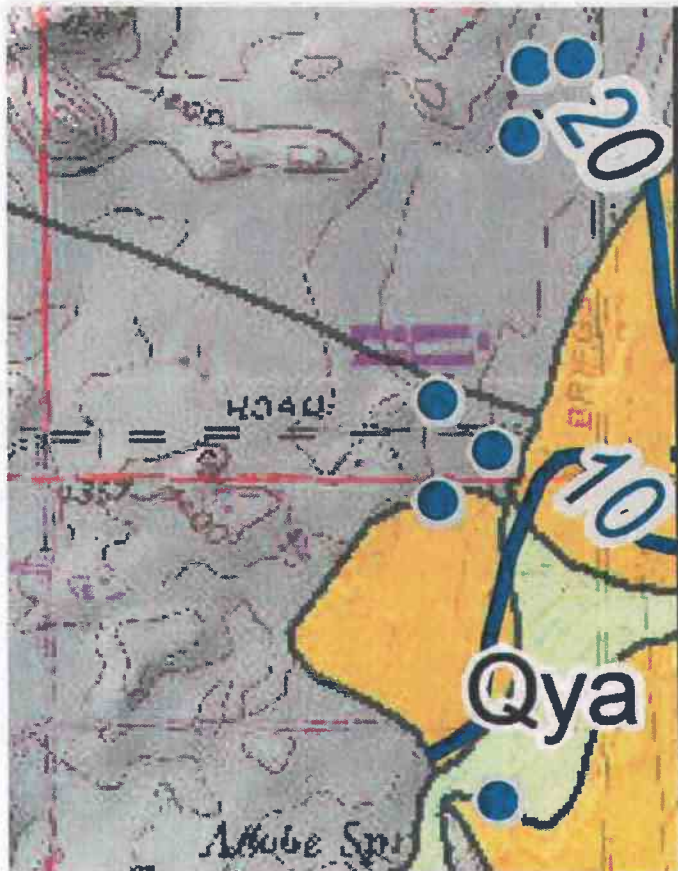
Consideration of the RCFCWCD - Public Flood Hazard Determination map for the project shows that approximately 20% of the project’s proposed housing units, parts of proposed Streets A and C and the proposed new detention basin are all placed in a flood hazard area:



The Initial Study *fails to describe the flood hazard and what structures are proposed to be placed in the flood hazard area* shown on the RCFCWCD - Public Flood Hazard Determination map. The Initial Study should have clearly addressed this material issue, hence the Applicant's determination under 25d on Page 40 is defective. Therefore, the application for Mitigated Negative Declaration should be rejected.

**6. The Initial Study is further defective because it fails to acknowledge how the flood hazard identified by RCFCWCD (see previous section 5) has increased since 2006, due to urban development on most of the upstream watershed, which covers hundreds of acres. For example, the US Geological Survey Fact Sheet 076-03 ("Effects of Urban Development on Floods") describes how "roads and buildings in flood-prone areas are exposed to increased flood hazard, including inundation and erosion, as new development continues", and "floodplain managers need new peak streamflow data to update flood frequency analyses and flood maps in areas with recent urbanization".**

**7. The initial study fails to describe and consider the near-surface groundwater on the site, as documented by the California Geological Survey in the following figure (2018 seismic hazard zone report for the Murrieta Quadrangle, Plate 1.2, showing depth to groundwater (contours, in feet) and groundwater measurement locations (dots)):**



7A. These California Geological Survey data show that the flood hazard zone identified by RCFCWCD in section 5 (above) is especially vulnerable to flash flooding, because very little rain falling on the site and/or the upstream watershed is required to severely diminish percolation before a severely increased proportion of rainfall in the watershed must pass across the project site, *exacerbating the flooding hazard*.

7B. Despite severe drought conditions during the past several years, the historically high *groundwater levels in the area (including the project site) have increased* (i.e. groundwater closer to the ground surface) due to two powerful, development-driven hydrological inputs - both from the two watersheds comprising several square miles, which converge above and below the ground surface at the confluence of the two RCFCWCD hazard zones shown in Section 5 (above), and which have been almost entirely covered with urban tracts since 2006. First, greatly accelerated transport of rainfall towards the projects and environs, due to a decrease in entry of rainfall in the urbanized upstream watershed. Second, input of imported EMWD water into the Murrieta/Temecula Groundwater Basin throughout the two upstream watersheds from irrigation using EMWD water reclaimed from urban sewage, and from irrigation using EMWD's drinking-quality water applied by individual homeowners.

The presence of wells in and around the project site represent an obvious avenue for a licensed water well contractor to obtain critical information on groundwater levels that should be part of any environmental study of the proposed project, prior to any approval by the County.

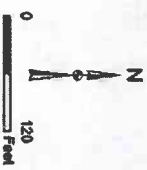
Sincerely yours,

Cecelia Webster  
30255 Los Alamos Road  
Murrieta CA 92563



Aerial Data: Bing 2010

- Legend**
- ESA Fencing
  - OHWM
  - Project Impact Area
  - Proposed Drainage Work
  - TCE
  - Slope Easement
  - Wetland No Impact
  - Wetland Permanent Impact
  - Wetland Temporary Impact
  - CDFW Streambed/Non-riparian No Impact
  - CDFW Streambed/Non-riparian Permanent Impact
  - CDFW Streambed/Non-riparian Temporary Impact
  - Slope Impacts



**Figure 6**  
**Clinton Keith Road Extension Project**



March 28, 2019

Ms. Dionne Harris, M. Arch  
Urban Regional Planner II  
County of Riverside Department of Planning  
4080 Lemon Street, 12<sup>th</sup> Floor  
Riverside, CA

RE: Comments on TTM 37294 "EA 43021 and related documents in the file concerning water wells, groundwater and hydrology" from Cecilia Webster dated 3/13/19

Dear Ms. Harris:

Thank you for providing the letter submitted to the planning department on March 13, 2019 by Ms. Webster regarding the Los Olivos project (EA43201 – TR37294). As the registered civil engineer for the project, we would like to address the comments brought up by Ms. Webster related to water wells, groundwater and hydrology for the proposed Los Olivos project. Below are Ms. Webster's comments in *italics* and our responses in **bold** below:

*1. Applicant has failed to follow simple guidance on requirements for Project approvals from the Riverside County Planning Department, communicated on July 26, 2017. Most glaring are listed CONDITIONS OF APPROVAL that Applicant has failed to comply with:*

**Response:** This comment is not a CEQA-related matter. The Applicant is not required to meet Conditions of Approval prior to approval of the Project. Conditions of Approval must be met prior to issuance of construction permits or certain construction milestones.

*1A: The FLOOD comments on Page 7 describe how the "stormwater runoff from".... "approximately 20 acres" flows into the project from the west. Yet EA 43021 cites a Drainage Report that fails to correctly identify the boundaries of this western watershed – instead analyzing drainage from only a portion of the true western watershed, and OMITTING drainage from parts of 4 multi-acre parcels south of Los Alamos Road (southwest of the project site) that contribute to flooding on properties north of Los Alamos Road. This material error is grounds for rejecting the Mitigated Negative Declaration.*

**Response:** The drainage report and topography in the area reflect that commenters statement is incorrect. As stated in the drainage report, the Project site accepts these existing flows from the west and conveys them through the property. Based on the existing topography, the property fronting the Project site south of Los Alamos Road slopes in a southeast direction routing runoff away from the existing

culvert north of Los Alamos Road. The project does not impact these flows in any drainage flow direction. No change to the Environmental Assessment/Initial Study/Mitigated Negative Declaration (CEQA document) is required.

*1B: The HEALTH comments on Page 2 list a requirement to "properly locate and plot locations of all existing wells and onsite wastewater treatment systems for this project". Applicant declares in Tentative Tract Map No. 37294 before the Commission that "no existing water wells are located on-site or within sphere of influence" (Note 21) and "no known existing wells are on the property, or within 200 feet of property boundary" (Note 29). These are FALSE STATEMENTS, which if accepted by the County, threaten groundwater quality in the Murrieta/Temecula Groundwater Basin, in violation of State law - because there are multiple existing active and abandoned wells, and septic systems, on and neighboring the project site. Many of these wells are plainly visible from public roads; the most recent wells in the County can be identified on the County-maintained website. Therefore, the Planning Commission needs to support the County's responsibility to comply with State law by rejecting the proposed Mitigated Negative Declaration.*

**Response:** The cited statements are Conditions of Approval. This is not a CEQA-related comment. Prior to construction of the Project, the Applicant will need to comply with these conditions. As stated in Condition 060- Environmental Health #1, the Applicant will need to properly abandon and remove any wells and septic systems on the property. That Condition acknowledges the presence of existing wells on the property.

*2. The failure by the Applicant to address the Condition of Approval concerning existing water wells and septic tanks, described above in 1B, is compounded by unjustified judgments made in EA 43021 that the project will have a "Less than Significant Impact" on water quality (25g, page 40). In fact, California's Water Laws clearly explain how wells must be constructed, abandoned etc. by exacting standards executed only by specially licensed professionals for the express purpose of minimizing degradation of groundwater quality - and so, the inexcusably false representations made by the Applicant regarding wells and septic systems are, in and of themselves, a substantial threat to groundwater quality. This consideration justifies rejecting the proposed Mitigated Negative Declaration.*

**Response:** As stated above, the Applicant will need to properly abandon and remove any existing wells and septic systems on the property. The Phase 1 ESA and the Conditions of Approval acknowledge the presence of existing wells on the property. No change to the CEQA document is required.

*3. The Indemnification Agreement (see item 5 on Page 2 of the July 26, 2017 letter, referenced above, in item 1) improperly delegates the County's responsibility for*

*management/oversight of wells in the County - since such delegation improperly protects the government at the expense of the governed, and institutionalizes a financial incentive to violate State Law. The basic issue is that the County has the permanent duty to protect valuable groundwater resources by recognizing misdemeanors such as failure to abandon water wells according to the State's legal standards. The County needs to demonstrably require continued protection of public groundwater resources comprising the Murrieta/Temecula Groundwater Basin that hundreds of thousands of residents in the 3rd Supervisorial District benefit from. The County cannot pass on this responsibility to the perpetrator via an indemnity, since this abuse of discretion would necessitate the remedy of an appeal to the Water Board for the Board to assume direct management of well resources in the threatened area, presumably funded by fees the County collects for this purpose. I look forward to the Commission's and County Counsel's judgement on this matter, particularly since this threat is also relevant to wells on recently acquired public lands in our neighborhood, administered by RCTLMA and RCA.*

**Response:** This is not a CEQA-related comment. Applicant will need to confer with County Counsel on the interpretation of the Indemnity Agreement. As stated above, the Applicant is required to properly abandon and remove any existing wells and septic systems on the property pursuant to applicable state and local laws and the project's Conditions of Approval. Because these laws are mandated, groundwater resources will not be impacted. No change to the CEQA document is required.

*4. On page 3 of EA 43021 Applicants fail to identify a single environmental impact in the sphere of Hydrology/Water Quality that "would be potentially affected by this Project, involving at least one impact that is a potentially significant impact or less than significant with mitigation incorporated". This is an unjustified failure, made possible through a foundation of omitted hydrological features, evident by critical review of the Applicant's defective submission that: "The site consists of relatively flat and gently sloping terrain with some hummocky mounds in the southeast portion of the site. In addition, the site contains one drainage feature that flows from north to south across the easternmost portion of the site" (EA 43021, page 2). In fact there are several drainage features that control movement of stormwater across and out of the project site - features that should have been described and considered in the Initial Study, including those identified in the following figure (discussed in text 4A through 4D):*

**Response:** This statement is a reference to a "brief description" of the property and the surroundings as an introduction to the Environmental Assessment. This general section was not intended to include all the factors that were reviewed in the various hydrology and drainage studies used to make the determinations under the CEQA document. The CEQA document, which is comprised of the Initial Study/Environmental Assessment and all technical studies, including the drainage and hydrology studies, contains multiple detailed descriptions of the property. No change to the CEQA document is required.

4A. Missing from the Initial Study, but evident in Flood Control Topo Maps and plainly visible from surrounding roads, exists a significant detention basin south of the eastern-most line of olive trees (labeled "Pond"), which detains water from approximately 30 acres of watershed (i.e. the historic agricultural and current residential portions of the project site plus the 20 acres of watershed draining onto the project that are misunderstood by Applicant in point 1A, above).

**Response:** See response to #4, above. The Applicant has submitted various drainage and hydrology studies that clearly show that the project is not affecting flows in or out of the Project area. All the "features" of the property are taken into account in these studies. Some limited, inconsequential ponding may occur on the property during large storm events but that does not make it a drainage feature and is solely due to the limited improvements on the property. Contrary to the commenter's statement, a "pond" is not a "detention basin" facility; the Project site and any areas that may pond are insubstantial, small localized depressions (approximately 6,000 square feet and 1.2 feet deep) that have no effect on the Project area's drainage or hydrology. In addition, this area was not determined to be riparian or jurisdictional in nature and is not considered a drainage feature. No change to the CEQA document is required.

4B. Missing from the Initial Study, but plainly visible from surrounding roads, is a substantial earthwork that runs north to south (labeled "berm"); the most substantial portion of the berm is evident in Flood Control Topo maps, to the east of the pond. The berm works in concert with the pond to, first, steer all stormwater collected from the aforementioned 30 acre watershed southward towards Los Alamos Road via a narrow channel (converging with creek water at the 18 inch culvert under Los Alamos Road under non-flooding conditions) and, second, by separating this stormwater from the Warm Springs Creek tributary and wetlands east of the berm.

**Response:** See response to comment 4A above.

4C. The Initial Study fails to recognize that Los Alamos Road at the SE corner of the project serves to detain stormwater on the project site, since the culvert is grossly undersized relative to creek flow even during and after average rainfall events, creating a significant detention basin north of Los Alamos Road, which frequently extends across the roadbed (see figure above; hence the "subject to flooding" roadway sign next to the project site).

**Response:** The project has been designed so that the post-development flows leaving the site will be 90% or less of the pre-development flows, which should actually reduce the amount of downstream flooding. From a traffic standpoint, this project may actually improve safety conditions in the area by providing an emergency route to circumvent the current off-site flooding condition on Los Alamos Road due to the existing undersized culvert. This condition has no effect on the Project and the Project will not affect this condition. No change to the CEQA document is required.

4D. The applicant proposes to encroach on the floodplain of the creek at the eastern end of the project with housing tracts and a detention basin, but fails to describe how these proposed elements will displace a significant existing detention basin, identified in the figure above ("Wetland"), and thereby unreasonably avoids acknowledging obvious environmental impacts, notably increasing flooding downstream at Los Alamos Road and beyond.

**Response:** See response above. Additionally, a HEC-RAS study was completed for the Project and incorporated into the CEQA document that incorporates neighboring drainage conditions including the analysis conducted by Riverside County's Clinton Keith Road Extension project team. The Applicant's consultants specifically reviewed the Clinton Keith Road Extension analysis and determined that there will be no significant effect to upstream or downstream properties. Further, the HEC-RAS Study has been reviewed and approved by RCFCWCD. No change to the CEQA document is required.

5. On page 40 of EA 43021, in checklist 25e) Applicants certify that the proposed project will have a less than significant impact by placing housing "within a ... flood hazard delineation map". Consideration of the RCFCWCD - Public Flood Hazard Determination map for the project shows that approximately 20% of the project's proposed housing units, parts of proposed Streets A and C and the proposed new detention basin are all placed in a flood hazard area. The Initial Study fails to describe the flood hazard and what structures are proposed to be placed in the flood hazard area shown on the RCFCWCD - Public Flood Hazard Determination map. The Initial Study should have clearly addressed this material issue, hence the Applicant's determination under 25d on Page 40 is defective. Therefore, the application for Mitigated Negative Declaration should be rejected.

**Response:** No structures are proposed to be built within the floodplain. The drainage and HEC-RAS studies completed for the project clearly defined the floodplain and provide a substantially more accurate depiction of the floodplain than the general RCFCWCD public flood hazard determination map. Based on the HEC-RAS mapped floodplain, the CEQA document confirms that the "proposed building pads are above the 100-year storm water surface elevation, which would be verified during the County's standard review and permitting process." Further, the CEQA document directly addresses flood zone issues in Section 26. No change to the CEQA document is required.

6. The Initial Study is further defective because it fails to acknowledge how the flood hazard identified by RCFCWCD (see previous section 5) has increased since 2006, due to urban development on most of the upstream watershed, which covers hundreds of acres. For example, the US Geological Survey Fact Sheet 076-03 ("Effects of Urban Development on Floods") describes how "roads and buildings in flood-prone areas are exposed to increased flood hazard, including inundation and erosion, as new

*development continues”, and “floodplain managers need new peak streamflow data to update flood frequency analyses and flood maps in areas with recent urbanization”.*

**Response:** See response to #5 above. The project’s drainage and HEC-RAS studies were completed in 2018 and include the most current watershed and hydrology information for the area. These studies have been reviewed and approved RCFCWCD. No change to the CEQA document is required.

*7. The initial study fails to describe and consider the near-surface groundwater on the site, as documented by the California Geological Survey in the following figure (2018 seismic hazard zone report for the Murrieta Quadrangle, Plate 1.2, showing depth to groundwater (contours, in feet) and groundwater measurement locations (dots))*

**Response:** The project’s Geotechnical Investigation report evaluates groundwater depths. The report concludes that groundwater depth is not an issue within the proposed development footprint. Shallow groundwater does not affect the project’s drainage or water quality structures. New water quality regulations require the project to retain stormwater runoff and such drainage structures do not rely on infiltration. No change to the CEQA document is required.

*7A. These California Geological Survey data show that the flood hazard zone identified by RCFCWCD in section 5 (above) is especially vulnerable to flash flooding, because very little rain falling on the site and/or the upstream watershed is required to severely diminish percolation before a severely increased proportion of rainfall in the watershed must pass across the project site, exacerbating the flooding hazard.*

**Response:** The project’s drainage and HEC-RAS report evaluated this condition. Additionally, the project’s drainage reports account for upstream conditions. The project will not alter upstream or downstream flows. No change to the CEQA document is required.

*7B. Despite severe drought conditions during the past several years, the historically high groundwater levels in the area (including the project site) have increased (i.e. groundwater closer to the ground surface) due to two powerful, development-driven hydrological inputs - both from the two watersheds comprising several square miles, which converge above and below the ground surface at the confluence of the two RCFCWCD hazard zones shown in Section 5 (above), and which have been almost entirely covered with urban tracts since 2006. First, greatly accelerated transport of rainfall towards the projects and environs, due to a decrease in entry of rainfall in the urbanized upstream watershed. Second, input of imported EMWD water into the Murrieta/Temecula Groundwater Basin throughout the two upstream watersheds from irrigation using EMWD water reclaimed from urban sewage, and from irrigation using EMWD’s drinking-quality water applied by individual homeowners.*

**Response:** The project has provided detailed drainage analysis demonstrating no impacts. No change to the CEQA document is required.

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I am available for any clarification or further questions that you may have.

Sincerely,



Tom Braun, MS, PE  
Principal

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March 14, 2019

Ms. Dionne Harris, M. Arch  
Urban Regional Planner II  
County of Riverside Department of Planning  
4080 Lemon Street, 12th Floor  
Riverside CA

Re: EA 43201 (TR 37294)

Dear Ms. Harris,

I submit the following comments concerning EA 43201 (TR 37294) for review by your Department and by the Riverside County Planning Commission, which is scheduled to review EA 43201 at Public Hearing on March 20, 2019.

**Applicant avers that “the project is consistent with the MSHCP and its Reserve Assembly goals” (EA 43201, 7. Biological Resources, pages 15-17). This conclusion is not supported by the evidence; it is based on inaccurate information, mis-leading statements, and Applicant’s mis-understanding of the MSHCP Reserve Assembly process.**

**The following reasons presented in EA 43201 for finding the project consistent with MSHCP and its Reserve Assembly are defective:**

1. The Applicant states, *“The project site is on the easterly edge of Cell Group Z, whereas the conservation goals call for conservation on the westerly side” (first bullet, page 17 EA 43201).* This is a false statement of MSHCP Plan goals which, in fact are stated as “Conservation within this Cell Group will range from 75%-85% of the Cell Group *focusing* in the western portion of the Cell Group”. ***The MSHCP Plan does not exempt Eastern portions of Cell Group Z from MSHCP acquisition.*** The Applicant’s misleadingly false representation of the MSHCP Plan goals should not be accepted by the Planning Commission, because it represent a foundational defect in the application for Mitigated Negative Declaration.
2. The Applicant states, *“The project site is disturbed, lacks habitat—other than a riparian/ riverine area that would be preserved as part of the project—and is mostly surrounded by developed permanent improvements and residences” (second bullet, page 17 EA 43201).* This argument fails to account for the ability of agricultural land to be restored once farming ceases (e.g., JPR #16-04-20-01 page 2), which is why RCA is able to effectively proceed towards its conservation goals, by acquiring agricultural and rural residential land (such as the 36.57 acres just south of the project, acquired by RCA on June 7, 2018 - see figure and further discussion below).





3. EA 43201 and all supporting documents in the file placed before the Riverside County Planning Commission fail to even mention:

A. the extensive RCA holdings just south of the project (including and on either side of the parcel marked "RCA" in the figure above);

B. that County Transportation owns a 2 acre parcel between the project and RCA sites (labeled TLMA on Figure), acquired as noise mitigation for Clinton Keith Road;

C. that the eastern side of the project is part of the same watercourse and wetland on these two unmentioned contiguous properties (TLMA and RCA), feeding into French Valley Creek (aka, Constrained Linkage 18 wildlife corridor, to the east).

The Applicant's failure to describe land use and geographical elements south of the project renders EA 43201 incomplete, and therefore inadequate for approval of the proposed Mitigated Negative Declaration by the Commission.

Furthermore, Applicant's failure to present accurate information on existing MSHCP conservation lands (freely available on the RCA website), renders unfounded their proclamations such as: *"The project site lacks a physical connection to an existing MSHCP conservation area"* (third bullet, page 17 EA 43201).

4. The Applicant states, "*The project site would not contribute or further impede the conservation goals for Cell Group Z, or cause fragmentation issues*" (fourth bullet, page 17 EA 43201). To the contrary, the site would make a positive contribution toward MSHCP goals through connectivity, as noted above. Furthermore, a contribution for conservation from the project site would unquestionably help the RCA progress towards goals for Cell Group Z (75%-85% conservation). Exemption of this project from MSHCP necessarily impedes RCA's conservation goals. The MSHCP Consistence Analysis discusses, at length, how difficult is to meet these goals. Applicant's solution is not to try; they propose to not give even 1 square foot of wetland to the MSHCP.

Meeting the Reserve Assembly goal in Cell Group Z may not be possible, but this is not a rationale for exempting this project from MSHCP participation. Rather, as the Wildlife Services wrote in their comments, "*It seems therefore that the entire project area should come into conservation*" (see letter from the Wildlife Services re JPR # 17-10-02-01, dated March 5, 2018, page 2, shown on page 5 of this document, where I highlight key text).

5. The Applicant states, "*Conservation goals could still be met in the Area Plan and/or between Area Plans within a single Rough Analysis Unit depending on future assembly of conservation area or subject to a Minor Amendment or Criteria Refinement to conservation criteria*" (sixth bullet, page 17 EA 43201). Reliance on some future adjustment to conservation criteria is inappropriate. The Wildlife Services specifically "*request(ed) that either a Criteria Refinement for Cell Group Z be completed or the mechanism for adjusting Proposed Core 2 and or Cell Group Z be identified and implemented prior to project approval*" (see Wildlife Services letter's second page, shown on page 5 of this document, where I highlight key text).

The Wildlife Services "*disagree with the RCA's conclusion that the proposed Project development is consistent with MSHCP Reserve Assembly requirements*" (see letter from Wildlife Services, included as pages 4-5 of this document). I am concerned that the Wildlife Services review of this project is in opposition to RCA's approval, and that their concerns and requests have gone unresolved and unanswered; they should be addressed in EA 43201. Ignoring the Wildlife Services could jeopardize MSHCP status as an approved conservation plan that meets state and federal standards.

**The above considerations describe how EA 43201 is defective and therefore does NOT comply with CEQA. The Project is NOT CONSISTENT with MSHCP. The Application for a Mitigated Negative Declaration is not supported by the evidence and should be denied.**

Sincerely yours,

Cecelia Webster  
30255 Los Alamos Road  
Murrieta CA 92563

EA 43201



U.S. Fish and Wildlife Service  
Palm Springs Fish and Wildlife Office  
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Palm Springs, California 92262  
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FAX 760-322-4648



California Department of Fish and Wildlife  
Inland Deserts Region  
3602 Inland Empire Blvd., Suite C-220  
Ontario, California 91764  
909-484-0167  
FAX 909-481-2945

In Reply Refer To:  
FWS/CDFW-WRIV-18B0131-18CPA0154

March 5, 2018  
*Sent by email*

Mr. Ken Baez  
Planning Department  
County of Riverside  
P.O. Box 1409  
Riverside, California 92502-1409

Attn: Don Copeland

Subject: Western Riverside County MSHCP Joint Project Review #17-10-02-01 (County of  
Riverside HANS 2367 / PAR 1542 / TR 37294)

Dear Mr. Baez:

The U.S. Fish and Wildlife Service (Service) and the California Department of Fish and Wildlife (Department), hereafter referred to jointly as the Wildlife Agencies, have reviewed Joint Project Review (JPR) #17-10-02-01 for the County of Riverside HANS 2367/TR 37294 (Project), which we received from the County on February 17, 2017. The JPR was prepared to evaluate the Project's consistency with the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP). The Wildlife Agencies are providing the following comments as they relate to the Project's consistency with MSHCP Sections 3.3.15 and 3.2.3 (Description and Area Plan Criteria of the MSHCP Conservation Area).

The proposed Project is located in the northwestern corner of Los Alamos Road and Briggs Road within the unincorporated French Valley area of MSHCP Proposed Core 2 and the vicinity of Proposed Constrained Linkage 18 in the County of Riverside. The overall project site is 12.6 acres in size, and would consist of 48 residential lots, four open space lots, internal roadways, drainage facilities, a detention/bio-retention basin, and a 30-inch storm drain and basin outlet. The development will result in a total of 10.6 acres of permanent impacts, and will avoid 0.56-acres of an ephemeral drainage located on the eastern boundary of the Project site. The Clinton Keith Road Extension Phase II Project will permanently affect 0.28 acres of the on-site drainage. A deed restriction will be placed over the remaining 0.28 acres by the Project.

The Project is located in the French Valley/Lower Sedco Hills sub-unit of the Southwest Area Plan in MSHCP Criteria Cell 5570 of Cell Group Z. There is a small, avoided section of the Project in the western portion of Cell 5572, an independent cell. The MSHCP calls for conservation of 75-85 percent of Cell Group Z focusing on the western portion of the Cell Group. Conservation within Cell Group Z contributes to Proposed Core 2.

The Western Riverside County Regional Conservation Authority's (RCA) Reserve Assembly Analysis states:

"Using the mid-range (80%), approximately 768 acres are described for conservation within this approximately 960-acre Cell Group. To date, 397.36 acres have been developed or are approved for development in this Cell, covered road acreage is 40.38 acres, and 335 acres have been conserved to date in this Cell Group. The proposed development acreage is 10.6 acres, leaving

Mr. Ken Baez (FWS/CDFW-WRIV-18B0131-18CPA0154)

176.66 acres of undeveloped and unconserved acres available for conservation. In addition to the 335 acres of existing conservation within Cell Group Z, there are only 511.66 acres of conservation available [sic], or 53% of the Cell Group, making it unable to attain it Reserve Assembly commitment.”

The RCA’s JPR Reserve Assembly Analysis shows that – due to existing and already approved developments – the conservation acreage described for Cell Group Z can no longer be achieved. The Plan describes 75 to 85 percent conservation for Cell Group Z, which is equivalent to 720 – 816 acres in the Cell Group. However, only 524.26 acres remain undeveloped and available for conservation in the Cell Group at present, leaving a shortfall of 195.74 – 291.74 acres needed to achieve Reserve Assembly, but unavailable. The above analysis indicates that the Reserve Assembly requirements in Cell Group Z will not be achieved even if the remaining undeveloped area is conserved. It seems therefore that the entire project area should come into conservation. (Note we are not sure the single-family 5-acre lots should have been counted in the already developed area.)

When the conservation described by the Plan cannot be achieved in a particular area, the MSHCP allows a Permittee to propose a Criteria Refinement to make up the shortfall in conserved habitat acres by conserving those acres elsewhere in the Plan Area. The shortage of acres available for conservation in Cell Group Z highlights the need to complete a Criteria Refinement for this Cell Group. The JPR analysis states adjustments to Proposed Core 2 and or Cell Group Z will need to be made by the RCA and concludes the development of the Project site would not impede reserve assembly because it is not connected to existing conservation.

We disagree with the RCA’s conclusion that the proposed Project development is consistent with MSHCP Reserve Assembly requirements. The Regional Map included in the JPR packet does not show a barrier to connectivity between the existing conservation and the proposed Project site. We are also unclear how the RCA proposes to adjust Proposed Core 2 and or Cell Group Z. We request that either a Criteria Refinement for Cell Group Z be completed or the mechanism for adjusting Proposed Core 2 and or Cell Group Z be identified and implemented prior to project approval. We would like to meet with the RCA and the County to discuss the Project and Reserve Assembly

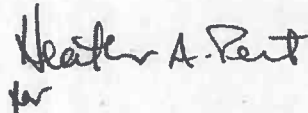
We appreciate the opportunity to comment on this JPR. To schedule a meeting or if you have questions about this letter, please contact Karin Cleary-Rose of the Service at 760-322-2070, extension 206, or Heather Pert of the Department at 858-395-9692.

Sincerely,

**KARIN  
CLEARY-ROSE**

Digitally signed by KARIN  
CLEARY-ROSE  
Date: 2018.03.05 18:13:44  
-08'00'

for  
Kennon A. Corey  
Assistant Field Supervisor  
U.S. Fish and Wildlife Service



Leslie MacNair  
Regional Manager  
California Department of Fish and Wildlife

cc:  
Charles Landry, Regional Conservation Authority

March 28, 2019

Dionne Harris  
Riverside County Planning Department  
P.O. Box 1409  
Riverside, CA 92502-1409

RE: County of Riverside Environmental Assessment Number 43201 (TR37294, CZ07937, PP26249)

Dear Ms. Harris:

We have reviewed the comment letter received from Cecelia Webster, dated March 14, 2019. My firm is the biological/environmental consultant for the project proponent. We worked in coordination with the County, the RCA, and the Wildlife Agencies during the project's MSHCP's consistency analysis and negotiations. This response letter will address each of the comments individually below; however, there are a few broad issues that need to be addressed:

- First, the Environmental Assessment/Mitigated Negative Declaration (CEQA Document) is not the project applicant's document. It is the County's document that they represent the independent judgement of the County in determining compliance with CEQA.
- Secondly, the County and RCA are responsible for implementing and enforcing the terms of the MSHCP. In this particular case, the RCA determined that the project was consistent with the MSHCP requirements. Although the Wildlife Agencies' letter, dated March 5, 2018, disagreed with the RCA's conclusion, further discussions and negotiations between the Wildlife Agencies, the County and the RCA were held at the RCA's office on March 20, 2018 and May 2, 2018 which resulted in the determination that the project is in fact consistent with the MSHCP requirements.
- Thirdly, none of the comments require revisions to the CEQA document.
- Lastly, it should be noted that a portion of the property is not with a conservation Cell Group.

Below are the comments and our responses to each of them:

***Comment:*** 1. The Applicant states, "The project site is on the easterly edge of Cell Group Z, whereas the conservation goals call for conservation on the westerly side" (first bullet, page 17 EA 43201). This is a false statement of MSHCP Plan goals which, in fact are stated as "Conservation within this Cell Group will range from 75%-85% of the Cell Group focusing in the western portion of the Cell Group". The MSHCP Plan does not exempt Eastern portions of Cell Group Z from MSHCP acquisition.

**Response:** During the RCA Joint Project Review (JPR), the RCA made the following determination:

**“The proposed project is located within the eastern side of Cell Group Z adjacent to existing residential development to the north and east that is extending along Clinton Keith Road. In addition, the proposed project is east of Warm Springs Creek and Proposed Core 2. The majority of the conservation already existing within Cell Group Z is located within the center of the Cell Group and comprises the majority of Proposed Core 2. This core is described as extending west from the already conserved land to encompass the western side of the Cell Group. Development of the proposed project is located east of the existing conservation and is not expected to impede the functions of Proposed Core 2 due to its adjacency to other development...Finally, the project site does not impact riparian scrub, woodland or forest, chaparral, coastal sage scrub, or grassland. Adjacent to the project site to the east is riparian woodland; however, this riparian habitat will be avoided, allowing some function as a corridor leading to Proposed Constrained Linkage 18, which lies southeast of the Cell Group and ultimately connects with Warm Springs Creek. However, north of Clinton Keith Road the drainage has been heavily altered as open space in Spencer’s Crossing and was not intended to connect to other conservation to the north... Given the location of the project site and its lack of physical connection to existing conservation within Proposed Core 2, and that the project site would not contribute to this Reserve feature, development of the proposed project would not further impede the conservation goals for Proposed Core 2, or cause fragmentation issues. Furthermore, the applicable portions of the project site that contribute to Proposed Constrained Linkage 18 are being avoided by the proposed project. Development of the proposed project would not further impede the conservation goals for this linkage or cause additional fragmentation issues. Based on this discussion, development of the proposed project site is consistent with the Reserve Assembly goals of the MSHCP.”**

**Although conservation can take place elsewhere within Cell Group Z and the MSHCP does not exempt the eastern portion of the Cell Group from conservation, the RCA found that, based upon the project site’s existing condition and location relative to existing conservation lands, the site would not contribute to the conservation goals of the Cell Group, other than the riparian drainage area, which is being avoided by the development. No change to the CEQA document is required.**

**Comment:** 2. *The Applicant states, “The project site is disturbed, lacks habitat—other than a riparian/riverine area that would be preserved as part of the project—and is mostly surrounded by developed permanent improvements and residences” (second bullet, page 17 EA 43201). This argument fails to account for the ability of agricultural land to be restored once farming ceases (e.g., JPR #16-04-20-01 page 2), which is why RCA is able to effectively proceed towards its conservation goals, by acquiring agricultural and rural residential land (such as the 36.57 acres just south of the project, acquired by RCA on June 7, 2018 - see figure and further discussion below).*

**Response:** The acquisition of the lands to the south would contribute to the conservation goals of Cell Group B, not Cell Group Z in which the project is located. Conservation within Cell Group B “focus on

coastal sage scrub, grassland, riparian scrub, woodland and forest habitat and agricultural land." Conservation within Cell Group Z "focus on riparian scrub, woodland and forest habitat along Warm Springs Creek and adjacent chaparral, coastal sage scrub and grassland habitat." While Conservation within Cell Group B calls for agricultural land, Cell Group Z (in which the project site is located) does not. This would account for the RCA's decision to acquire the lands located within Cell Group B to the south. However, as stated above, the RCA, through the JPR process, determined that the subject project site would not contribute to the conservation goals of Cell Group Z. No change to the CEQA document is required.

Comment: 3. EA 43201 and all supporting documents in the file placed before the Riverside County Planning Commission fail to even mention:

A. the extensive RCA holdings just south of the project (including and on either side of the parcel marked "RCA" in the figure above);

Response: As stated above, the acquisition of the lands to the south contribute to the conservation of Cell Group B, not Cell Group Z in which the project site is located. No change to the CEQA document is required.

B. that County Transportation owns a 2 acre parcel between the project and RCA sites (labeled TLMA on Figure), acquired as noise mitigation for Clinton Keith Road;

Response: Based on a title review, the County transportation department does not currently own the above-mentioned parcel. Even if the County transportation department owned this parcel, it is not related to the project, is not being acquired as part of the MSHCP, and is entirely related to the County's construction of Clinton Keith Road. No change to the CEQA document is required.

C. that the eastern side of the project is part of the same watercourse and wetland on these two unmentioned contiguous properties (TLMA and RCA), feeding into French Valley Creek (aka, Constrained Linkage 18 wildlife corridor, to the east).

Response: During the RCA Joint Project Review (JPR), the RCA made the following determination:

"Adjacent to the project site to the east is riparian woodland; however, this riparian habitat will be avoided, allowing some function as a corridor leading to Proposed Constrained Linkage 18, which lies southeast of the Cell Group and ultimately connects with Warm Springs Creek. However, north of Clinton Keith Road the drainage has been heavily altered as open space in Spencer's Crossing and was not intended to connect to other conservation to the north. It should be noted that the proposed Clinton Keith Road expansion project will ultimately remove much of the riparian vegetation in this area... Given the location of the project site and its lack of physical connection to existing conservation within Proposed Core 2, and that the project site would not contribute to this Reserve feature, development of the proposed project would not further impede the conservation goals for Proposed Core 2, or cause fragmentation issues.

Furthermore, the applicable portions of the project site that contribute to Proposed Constrained Linkage 18 are being avoided by the proposed project. Development of the proposed project would not further impede the conservation goals for this linkage or cause additional fragmentation issues.”

Per the CEQA document, no project activities would occur within the onsite drainage prior to, during, and following construction, including grading, manufactured slopes, fuel modification, and staging. No change to the CEQA document is required.

*Comment: The Applicant’s failure to describe land use and geographical elements south of the project renders EA 43201 incomplete, and therefore inadequate for approval of the proposed Mitigated Negative Declaration by the Commission. Furthermore, Applicant’s failure to present accurate information on existing MSHCP conservation lands (freely available on the RCA website), renders unfounded their proclamations such as: “The project site lacks a physical connection to an existing MSHCP conservation area” (third bullet, page 17 EA 43201).*

**Response:** As stated above, the acquisition of the lands to the south contribute to the conservation of Cell Group B, not Cell Group Z in which the project site is located. Furthermore, during review of the proposed project, no conservation lands existed to the south as they were not acquired by the RCA until June 2018.

*Comment: 4. The Applicant states, “The project site would not contribute or further impede the conservation goals for Cell Group Z, or cause fragmentation issues” (fourth bullet, page 17 EA 43201). To the contrary, the site would make a positive contribution toward MSHCP goals through connectivity, as noted above. Furthermore, a contribution for conservation from the project site would unquestionably help the RCA progress towards goals for Cell Group Z (75%-85% conservation). Exemption of this project from MSHCP necessarily impedes RCA’s conservation goals.*

**Response:** As previously stated, the RCA found that, based upon the project site’s existing condition and location relative to existing conservation lands, the site has would not contribute to the conservation goals of the Cell Group, other than the riparian drainage area, which is being avoided by the development). Therefore, the CEQA document is correct in stating that the project would not impede the conservation goals for Cell Group Z. No change to the CEQA document is required.

*Comment: The MSHCP Consistence Analysis discusses, at length, how difficult is to meet these goals. Applicant’s solution is not to try; they propose to not give even 1 square foot of wetland to the MSHCP.*

**Response:** As previously stated, no project activities would occur within the onsite drainage prior to, during, and following construction, including grading, manufactured slopes, fuel modification, and staging. The entire riparian area on the eastern portion of the property is being conserved as open space. No change to the CEQA document is required.



**Comment:** *Meeting the Reserve Assembly goal in Cell Group Z may not be possible, but this is not a rationale for exempting this project from MSHCP participation. Rather, as the Wildlife Services wrote in their comments, "It seems therefore that the entire project area should come into conservation" (see letter from the Wildlife Services re JPR # 17-10-02-01, dated March 5, 2018, page 2.*

**Response:** As previously stated, although the Wildlife Agencies' letter, dated March 5, 2018, disagreed with the RCA's conclusion, further discussions and negotiations with the County, RCA, and Wildlife Agencies resulted in the determination that the project is in fact consistent with the MSHCP requirements. In addition, the project is required to pay MSHCP fees to allow the purchase of other valuable conservation property that will actually contribute to the MSHCP conservation goals. No change to the CEQA document is required.

*5. The Applicant states, "Conservation goals could still be met in the Area Plan and/or between Area Plans within a single Rough Analysis Unit depending on future assembly of conservation area or subject to a Minor Amendment or Criteria Refinement to conservation criteria" (sixth bullet, page 17 EA 43201). Reliance on some future adjustment to conservation criteria is inappropriate. The Wildlife Services specifically "request(ed) that either a Criteria Refinement for Cell Group Z be completed or the mechanism for adjusting Proposed Core 2 and or Cell Group Z be identified and implemented prior to project approval" (see Wildlife Services letter's second page, shown on page 5 of this document).*

**Response:** As previously stated, although the Wildlife Agencies' letter, dated March 5, 2018, disagreed with the RCA's conclusion, further discussions and negotiations with the County, RCA, and Wildlife Agencies resulted in the determination that the project is in fact consistent with the MSHCP requirements. No change to the CEQA document is required.

*The Wildlife Services "disagree with the RCA's conclusion that the proposed Project development is consistent with MSHCP Reserve Assembly requirements" (see letter from Wildlife Services, included as pages 4-5 of this document). I am concerned that the Wildlife Services review of this project is in opposition to RCA's approval, and that their concerns and requests have gone unresolved and unanswered; they should be addressed in EA 43201. Ignoring the Wildlife Services could jeopardize MSHCP status as an approved conservation plan that meets state and federal standards.*

**Response:** As previously stated, although the Wildlife Agencies' letter, dated March 5, 2018, disagreed with the RCA's conclusion, but discussions with the Wildlife Agencies regarding various issues with this project and the entire program resulted in the determination that this project is in fact consistent with the MSHCP requirements. No change to the CEQA document is required.

Please feel free to contact me via email at [shawn@hernandezenvironmental.com](mailto:shawn@hernandezenvironmental.com) or by telephone at 951.334.6219 if you have any questions.

Sincerely,



Shawn Gatchel-Hernandez  
Principal Regulatory Specialist

Comments on EA 43201 re Cumulative Impacts

Ms. Dionne Harris, M. Arch  
Urban Regional Planner II  
County of Riverside Department of Planning  
4080 Lemon Street, 12th Floor  
Riverside CA

March 17, 2019

Re: EA 43201 (TR 37294)

Dear Ms. Harris,

I submit the following comments on defects in EA 43201 (TR 37294) concerning Mandatory Findings of Significance, for review by your Department and by the Riverside County Planning Commission, which is scheduled to review EA 43201 at Public Hearing on March 20, 2019.

CEQA requires Applicants to determine under point 52 of Mandatory Findings of Significance. **“Does the project have impacts which are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, other current projects and probable future projects)?**

Applicants claim “less than significant impact” (EA 43201, page 75-76). This judgment is unfounded because EA 43201 fails to adequately address the cumulative impacts of past projects (Horton, Spencer’s Crossing and additional up-stream development) and probable future projects (Clinton Keith Road extension from Leon Road to HS-79) on flooding and public safety. Development on neighboring parcels in a single watershed has the obvious potential for cumulative impacts on hydrology including flooding dangers, since changes in drainage patterns in each parcel have consequences downstream in the watershed. This requires critical analysis in this project because:

- A. The project site receives stormwater from an ~1600 acre watershed (over 2.5 square miles). Approximately half of this watershed (over 800 acres) has been developed as residential housing (MDR), beginning in 2005.
- B. Environmental review commissioned by The County in 2013 addressed the increased drainage flows onto the EA 43201 project site, since it is right next to the proposed extension of Clinton Keith Road (south of Leon Road); the Addendum to Supplemental EIR 398 states that **“water flows have increased from upstream development”** (page 5 of July 2013 habitat assessment prepared for Clinton Keith

Comments on EA 43201 re Cumulative Impacts

- Road Extension Project, approved by the Board of Supervisors June 2, 2015, in file 03-28part20.pdf).
- C. On the 17th of January, 1993 (prior to any urbanization of the watershed described in A, above) ***a resident of the project site for EA 43201 (30400 Los Alamos Road) was found drowned just downstream from the project site***, in the detention basin south of Los Alamos Road, west of Briggs Road and just north of the confluence of the project's creek with French Valley Creek. (See attached Certificate of Death).
- D. ***Flooding of the site of death in C, above, has increased since 2005 due to upstream development, and the project proposed in EA 43201 will further exacerbate the lethal danger by increasing flooding in the flood hazard zone.***
- E. While Riverside County Flood control has responded to the 1993 SW Riverside County flood disaster to mitigate the flood hazard in Temecula, by joining with Federal authorities in impressive flood control projects, ***Flood Control's activities in the watershed relevant to the EA 43201 project site have only made flooding on the project site and our neighborhood worse. The Initial Study defers, to some future time, how Flood Control will improve its mitigation performance on this project to achieve "less than significant" impacts on flooding of the EA 43201 project site and downstream (claimed in Mandatory Findings of Significance item 53 , page 77). In light of Flood Control's failure to mitigate dangerous flooding impacts of its various projects upstream on the project site and my neighborhood, mitigations for flooding hazards associated with the project should be identified prior to adoption of a Mitigated Negative Declaration.***
- F. The increased physical threat that flooding poses to property (mostly vehicles) and life is combined with the fact that ever ***higher numbers of Riverside County residents drive across submerged roadways just south of the EA 43201 project, representing an additional cumulative impact.***
- G. ***Applicants fail to consider the cumulative impact that the increased water on the EA 43201 project site has on vegetative growth in the wetland, which has been explosive in the recent past (during a drought throughout California), will likely continue with vigor, and will cause increased depths of flood water on the site, and increased flooding further downstream.*** Flood waters will be displaced by living and dead vegetation, and by mineral particles in accumulating soil - particles from air and water trapped in the vegetative growth. This displacement serves to reduce the amount of water held in the floodplain, causing an increase in flooding on either side of the creek-bed and downstream as plant growth continues each year. Vegetation and accumulating associated silt in the project site's floodplain will also impede site drainage via the culvert on Los Alamos Road, causing increased flooding across the public road. ***The culvert draining the project site at Los Alamos Road, is not***

Comments on EA 43201 re Cumulative Impacts

***designed to meet the requirements for passing 100-year peak flows and its design makes no accommodation for expected sediment and organic debris transport blocking the drainage; there is no consideration of this condition which contributes to the flooding hazard at Los Alamos Road and points south.***

The failure to address cumulative impacts and known severe hazards to the public is a significant deficiency, necessitating rejection of the Mitigated Negative Declaration.

Sincerely,

Cecelia Webster  
30255 Los Alamos Road  
Murrieta, CA 92563

**STATE OF CALIFORNIA**  
**CERTIFICATE OF DEATH**  
**COUNTY OF RIVERSIDE**  
 RIVERSIDE, CALIFORNIA

**CERTIFICATE OF DEATH**      **39333000630**

STATE FILE NUMBER		1A. NAME OF DECEDENT—FIRST (GIVEN)		1B. MIDDLE		1C. LAST (FAMILY)		1D. DATE OF DEATH—MO. DAY, YR. (SEE INSTRUCTIONS)		1E. SEX	
		Robert		Lawrence		Pitchford		Ed. January 17, 1993		M	
2A. RACE		2B. MARRIAGE—SPECIFY		3A. DATE OF BIRTH—MO. DAY, YR. (SEE INSTRUCTIONS)		3B. AGE IN YEARS		3C. MONTHS		3D. DAYS	
Black				October 15, 1926		66					
4. STATE OF BIRTH		5. CITIZEN OF WHAT COUNTRY		10A. FULL NAME OF FATHER		10B. STATE OF BIRTH		10C. FULL MAIDEN NAME OF MOTHER		10D. STATE OF BIRTH	
MS		U.S.A.		James Pitchford		MS		Mattie Harman		MS	
12. MILITARY SERVICE		13. USUAL OCCUPATION		14. MARRIAGE STATUS		15. NAME OF SURVIVING SPOUSE IF WIFE, ENTER MAIDEN NAME		16. YEARS IN OCCUPATION		17. EDUCATION—YEARS COMPLETED	
		Dispatcher		Married		Lucille Holguin		10		14	
18A. RESIDENCE—STREET AND NUMBER OR LOCATION		18B. COUNTY		18C. STATE OR FOREIGN COUNTRY		18D. NAME, RELATIONSHIP, MAILING ADDRESS AND ZIP CODE OF DECEASED		18E. CITY		18F. ZIP CODE	
30400 Los Alamos Rd.		Riverside		CA		Lucille Pitchford - Wife 30400 Los Alamos Rd. Murrieta, CA 92563		Murrieta		92563	
19A. PLACE OF DEATH		19B. STREET ADDRESS—STREET AND NUMBER OR LOCATION		19C. CITY		20. NAME, RELATIONSHIP TO DECEASED, ADDRESS AND PHONE NUMBER		21. WAS DEATH REPORTED TO CORONER?		22. WAS DEATH REPORTED TO CEMETARY?	
Open Field		36131 Briggs Rd.		Riverside		Murrieta, CA 92563		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
23. DEATH CAUSED BY:		24. IMMEDIATE CAUSE		25. DUE TO		26. OTHER SIGNIFICANT CONDITIONS CONTRIBUTING TO DEATH BUT NOT RELATED TO CAUSE GIVEN IN 21		27. WAS OPERATOR PERMITTED FOR ANY CONDITION IN ITEM 21 OR 25?		28. WAS OPERATOR PERMITTED FOR ANY CONDITION IN ITEM 21 OR 25?	
None		Drowning		None		None		No		No	
29. I CERTIFY THAT TO THE BEST OF MY KNOWLEDGE DEATH OCCURRED AT THE HOUR, DATE AND PLACE STATED FROM THE CAUSES STATED.		30. SIGNATURE AND OFFICE OF DECEASED		31. SIGNATURE AND OFFICE OF DECEASED		32. SIGNATURE AND OFFICE OF DECEASED		33. SIGNATURE AND OFFICE OF DECEASED		34. SIGNATURE AND OFFICE OF DECEASED	
35. NUMBER OF DEATHS—ONLY ONE MUST BE REPORTED. EACH DEATH BEING INVESTIGATED IF CAUSE IS UNKNOWN.		36. PLACE OF BURIAL		37. DATE OF BURIAL		38. HOW LONG HAS THE BODY BEEN BURIED?		39. DATE OF BURIAL		40. HOW LONG HAS THE BODY BEEN BURIED?	
Accident		Open Field		1-16-1993		Unknown		1-16-1993		Unknown	
41. LOCATION (STREET AND NUMBER OR LOCATION AND CITY)		42. NAME, RELATIONSHIP TO DECEASED, ADDRESS AND PHONE NUMBER		43. NAME, RELATIONSHIP TO DECEASED, ADDRESS AND PHONE NUMBER		44. NAME, RELATIONSHIP TO DECEASED, ADDRESS AND PHONE NUMBER		45. NAME, RELATIONSHIP TO DECEASED, ADDRESS AND PHONE NUMBER		46. NAME, RELATIONSHIP TO DECEASED, ADDRESS AND PHONE NUMBER	
36131 Briggs Rd., Murrieta		Forest Lawn Memorial Park 21100 Via Verde, Covina, CA		1-25-1993		7253					
47. NAME OF FUNERAL DIRECTOR (SEE INSTRUCTIONS)		48. LICENSE NO.		49. NAME OF FUNERAL HOME (SEE INSTRUCTIONS)		50. LICENSE NO.		51. DATE OF DEATH		52. SIGNATURE AND OFFICE OF DECEASED	
Forest Lawn Mortuary-Covina		F-1150		Forest Lawn Mortuary-Covina		F-1150		JAN 25 1993		43201	
STATE REGISTRAR		A.		B.		C.		D.		E.	


**CERTIFIED COPY OF VITAL RECORD**  
 STATE OF CALIFORNIA, COUNTY OF RIVERSIDE


This is a true and exact reproduction of the document officially registered and placed on file in the office of the County of Riverside, Assessor-County Clerk-Recorder.

OCT 05 2018

DATE ISSUED \_\_\_\_\_


This copy is not valid unless prepared on an engraved border displaying the date, seal and signature of the Assessor-County Clerk-Recorder.





034799903

*Peter Alderson*  
 Peter Alderson  
 ASSESSOR-COUNTY CLERK-RECORDER  
 RIVERSIDE COUNTY, CALIFORNIA



# PROACTIVE

ENGINEERING CONSULTANTS

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March 28, 2019

Ms. Dionne Harris, M. Arch  
Urban Regional Planner II  
County of Riverside Department of Planning  
4080 Lemon Street, 12<sup>th</sup> Floor  
Riverside, CA

RE: Comments on EA 43201 re Cumulative Impacts Letter from Cecilia Webster dated 3/17/19 for TTM 37294

Dear Ms. Harris:

We have reviewed the Letter dated March 17, 2019 from Cecilia Webster "Comments on EA 43201 re Cumulative Impacts". My firm, Proactive Engineering, is the engineering consultant of record for the project. As the registered civil engineer for the project, we would like to address the comments brought up by Ms. Webster for the proposed Los Olivos project. As stated in my previous response letter to Ms. Webster's concerns regarding hydrology and drainage, the project drainage studies include the existing and proposed impacts of drainage tributary to and including the project site. This project has already completed a hydrology study to determine existing and developed condition drainage flows for the project site, and a Flood Plain (HECRAS) study to analyze potential impacts of the project to the adjacent natural drainage course. Both studies have been reviewed and approved by RCFCWCD.

Below are the comments and our responses to each of them:

*Comment: A. The project site receives stormwater from an ~1600 acre watershed (over 2.5 square miles). Approximately half of this watershed (over 800 acres) has been developed as residential housing (MDR), beginning in 2005.*

**Response:** The project's drainage and hydrology studies considered existing upstream development and has determined that the project is not threatened by such hydrological conditions nor does the project have a significant effect on such drainage upstream or downstream. The project is also mitigating for increased runoff and other hydrological issues of concern by implementing current hydromodification requirements of the Regional Water Quality Control Board. No change to the CEQA document is required.

*Comment: B. Environmental review commissioned by The County in 2013, addressed the increased drainage flows onto the EA 43201 project site, since it is*

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*right next to the proposed extension of Clinton Keith Road (south of Leon Road); the Addendum to*

*Supplemental EIR 398 states that "water flows have increased from upstream development" (page 5 of July 2013 habitat assessment prepared for Clinton Keith Comments on EA 43201 re Cumulative Impacts Road Extension Project, approved by the Board of Supervisors June 2, 2015, in file 03-28part20.pdf).*

**Response:** As stated, the project's studies include the findings of the Clinton-Keith Road Extension project analyses. The Applicant and the project's hydrology engineers have worked closely with County Flood Control staff to scope and integrate the findings of the project's studies and those conducted for the adjacent parcel related to the approved Clinton-Keith Road Extension. These studies have found that the project would not contribute to increased surface water runoff flows. No change to the CEQA document is required.

*Comment: C. On the 17th of January, 1993 (prior to any urbanization of the watershed described in A, above) a resident of the project site for EA 43201 (30400 Los Alamos Road) was found drowned just downstream from the project site, in the detention basin south of Los Alamos Road, west of Briggs Road and just north of the confluence of the*

*project's creek with French Valley Creek. (See attached Certificate of Death);*

**Response:** Commented noted. This is not a CEQA-related matter. No applicable response as not applicable to project.

*Comment: D. Flooding of the site of death in C, above, has increased since 2005 due to*

*upstream development, and the project proposed in EA 43201 will further exacerbate the lethal danger by increasing flooding in the flood hazard zone.*

**Response:** The Commenter's statement is not accurate. As demonstrated in the drainage studies this project will not increase flooding upstream or downstream. The project includes a detention basin which will limit developed drainage flows to less than existing flows. The project site is out of the flood hazard zone. No change to the CEQA document is required.

*Comment: E. While Riverside County Flood control has responded to the 1993 SW Riverside County flood disaster to mitigate the flood hazard in Temecula, by joining with*

*Federal authorities in impressive flood control projects, Flood Control's activities in the watershed relevant to the EA 43201 project site have only made flooding on the project site and our neighborhood worse. The Initial Study defers, to some future time, how Flood Control will improve its mitigation performance on this project to achieve "less than significant" impacts on flooding of the EA 43201*



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*project site and downstream (claimed in Mandatory Findings of Significance item 53, page 77). In light of Flood Control's failure to mitigate dangerous flooding impacts of its various projects upstream on the project site and my neighborhood, mitigations for flooding hazards associated with the project should be identified prior to adoption of a Mitigated Negative Declaration.*

**Response:** The future extension to Clinton-Keith Road is and will have to mitigate any impacts it may have to the current drainage conditions. As discussed above, the project's studies include the findings of the Clinton-Keith Road Extension project analyses. No deferral of analysis or mitigation occurs because the Clinton-Keith Road Extension project includes required mitigation that will be implemented as the extension of Clinton Keith Road. The proposed residential project also incorporates mitigation that must be implemented as part of the project's construction. Applicant's Drainage and HEC-RAS studies were completed in 2018 and include current watershed and hydrology information for the area. These studies have been reviewed and approved by RCFCWCD. As stated above, the project does not affect on- or offsite flooding conditions and the project is not in a flood hazard zone. No change to the CEQA document is required.

*Comment: F. The increased physical threat that flooding poses to property (mostly vehicles) and life is combined with the fact that ever higher numbers of Riverside County residents drive across submerged roadways just south of the EA 43201 project, representing an additional cumulative impact.*

**Response:** The project's design includes a detention basin to limit future developed flows to no more than existing conditions. The project is therefore not contributing any offsite flooding impacts. Also, the project street layout will allow for an alternate route for local residents to Clinton Keith Road that can be utilized if Los Alamos Road is impacted by a flood event. No change to the CEQA document is required.

*Comment: G. Applicants fail to consider the cumulative impact that the increased water on the EA 43201 project site has on vegetative growth in the wetland, which has been explosive in the recent past (during a drought throughout California), will likely continue with vigor, and will cause increased depths of flood water on the site, and increased flooding further downstream. Flood waters will be displaced by living and dead vegetation, and by mineral particles in accumulating soil - particles from air and water trapped in the vegetative growth. This displacement serves to reduce the amount of water held in the floodplain, causing an increase in flooding on either side*

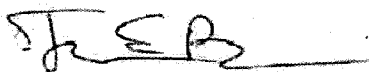
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F: 951/280-0279

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*of the creek-bed and downstream as plant growth continues each year. Vegetation and accumulating associated silt in the project site's floodplain will also impede site drainage via the culvert on Los Alamos Road, causing increased flooding across the public road. The culvert draining the project site at Los Alamos Road, is not designed to meet the requirements for passing 100-year peak flows and its design makes no accommodation for expected sediment and organic debris transport blocking the drainage; there is no consideration of this condition which contributes to the flooding hazard at Los Alamos Road and points south.*

**Response:** The process described by Ms. Webster is a natural and normal process of natural drainage courses: Seeds get deposited during low flows, plants grow, and some get uprooted during high storm flows. The cycle continues each year. As demonstrated in the County reviewed and approved drainage studies, the project will not increase storm runoff or flooding potential. The project has reviewed the hydrology and drainage studies prepared for the area, including those from upstream development, and the Clinton Keith Road Extension Study. The project's drainage studies show that project has no direct impacts that are inconsistent with the policies identified with Riverside County Flood Control or the County of Riverside. Los Alamos Road is not a Circulation Element road within the County of Riverside General Plan and was therefore not required to be designed to handle peak flows in a 100 year event. The project's hydrology and drainage studies have taken into account this condition, and the studies show that the project will not be impacted by offsite flooding or exacerbate these conditions. As stated above, the development of the Project will actually provide an additional emergency vehicle escape route that will allow vehicles on Los Alamos Road to access Clinton Keith through the tract in the event that Los Alamos Road becomes unpassable during a storm event. As stated above, the project's design includes a detention basin to limit future developed flows to less than existing conditions. The project will not cause erosion that will impact the adjacent riparian area or impact drainage functions that the riparian area serves. NPDES requirements would not permit the project to affect the riparian area or offsite drainage functions as described in the comment. In regards to vegetation concerns, maintenance of the existing Los Alamos culvert is within the jurisdiction of the County. No change to the CEQA document is required.

Sincerely,



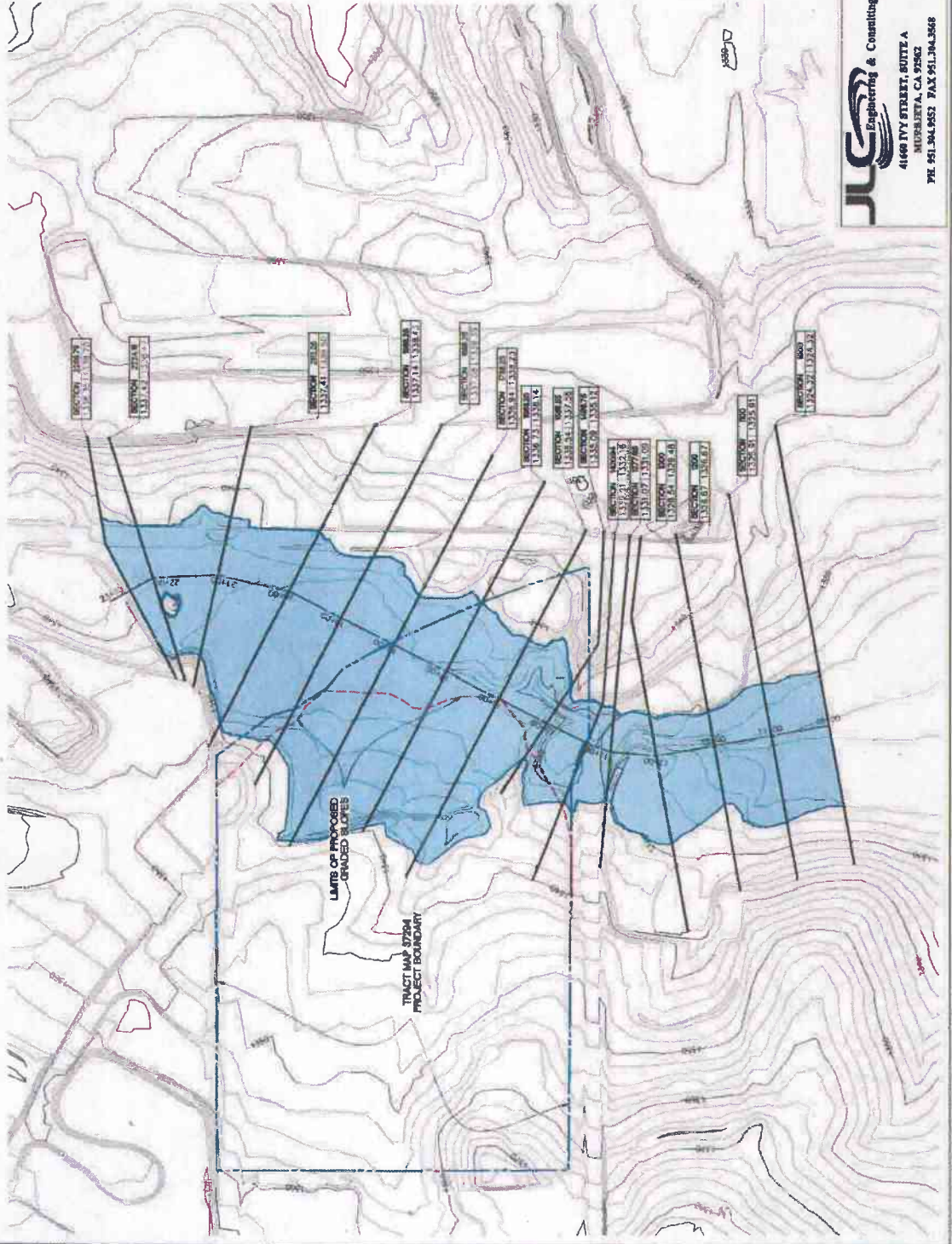
Tom Braun, MS, PE  
Principal

# PRELIMINARY TENTATIVE TRACT MAP 37294

COUNTY OF RIVERSIDE, STATE OF CALIFORNIA

## EXISTING HEC-RAS SECTION MAP

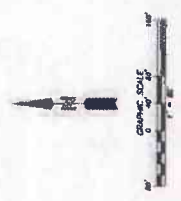
SHEET 1 OF 1



**LEGEND:**

- SECTION NUMBER  
PART-WEST
- CROSS SECTION - SECTION LINE
- CHANNEL CENTERLINE
- FLOOD PLAIN LIMITS

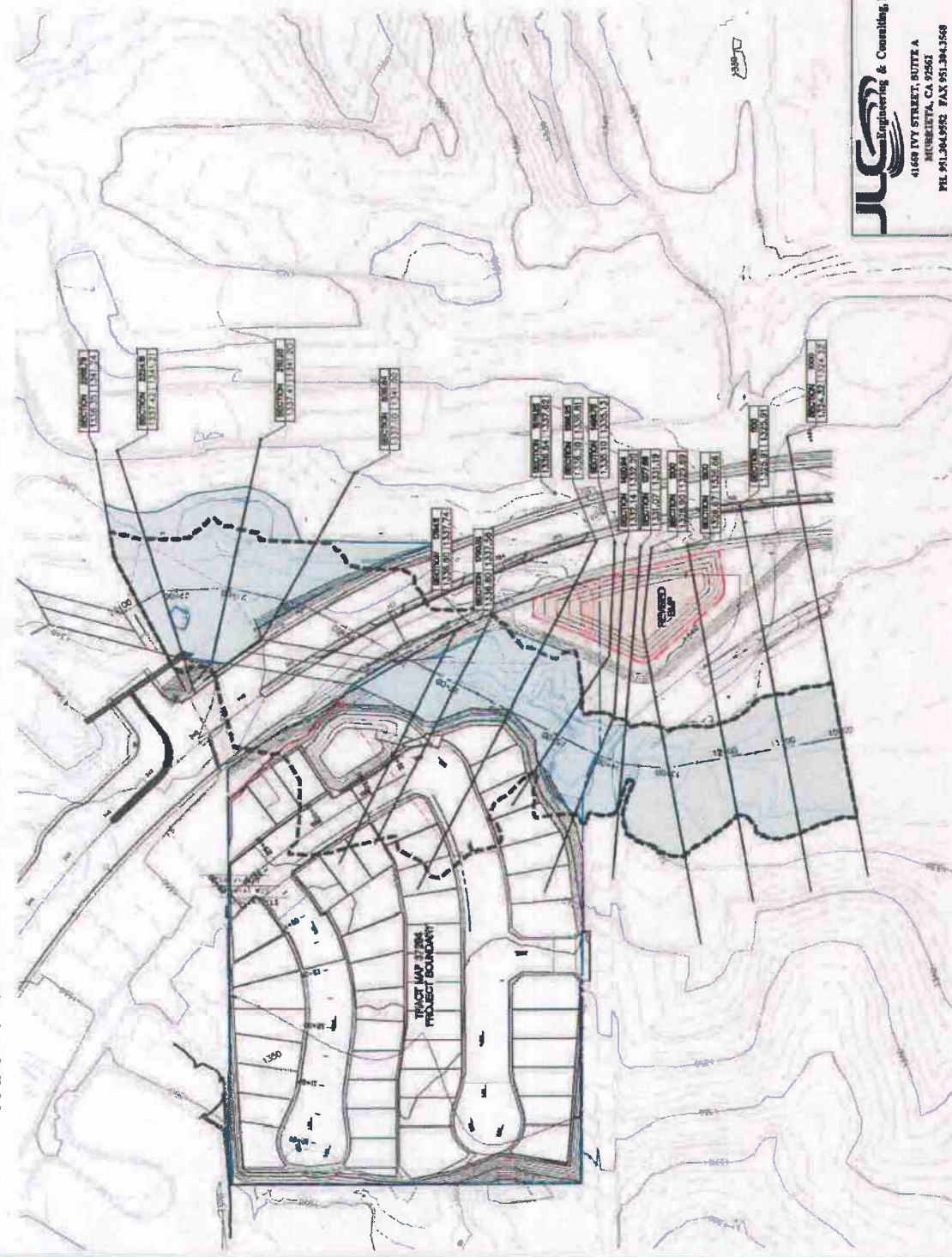
**NOTE:**  
 HEC-RAS SECTION ARE BASED ON TOPOGRAPHY OBTAINED FROM RCMD AND RCPGD. TOPOGRAPHIC MAPPING IS ON NAD83. DESIGN FOR TRACT MAP IS ON NAD29. THE VERTICAL DIFFERENCE BETWEEN DATUMS IS 2.38 FT.



**EXHIBIT 'X-1'**  
**TTM NO. 37294**  
**EXISTING HEC-RAS**  
**SECTION MAP**

**JUC** Engineering & Consulting, Inc.  
 4160 IVY STREET, SUITE A  
 MURBETTA, CA 92562  
 TEL 951.304.9552 FAX 951.304.3568

# PRELIMINARY TENTATIVE TRACT MAP 37294 COUNTY OF RIVERSIDE, STATE OF CALIFORNIA TRACT 37294 AND CLINTON KEITH ROAD HEC-RAS SECTION MAP



THE HEC-RAS SECTION FOR CLINTON KEITH ROAD PRELIMINARY DESIGN ELEVATE THE WATER SURFACE ELEVATION FOR THE EXISTING LEON ROAD CULVERT APPROXIMATELY 3 FEET. IT IS RECOMMENDED THAT THE CLINTON KEITH ROAD IMPROVEMENTS ADDRESS IMPACTS TO UPSTREAM STORM DRAIN AND BASINS.

**LEGEND:**

- SECTION MARK
- PRE-FILE
- CROSS SECTION - SECTION LINE
- CHANNEL CENTERLINE
- PRE-PROJECT FLOOD PLAIN LIMITS
- FLOOD PLAIN LIMITS

**NOTE**  
HEC-RAS SECTION ARE BASED ON TOPOGRAPHY OBTAINED FROM RCWD AND POFCD. TOPOGRAPHIC MAPPING IS ON NAD83. DESIGN FOR TRACT MAP IS ON NAD83. THE VERTICAL DIFFERENCE BETWEEN DATUMS IS 2.88 FT.



**EXHIBIT "X-1"**  
TTM NO. 37294  
TR 37294 AND CKR  
HEC-RAS SECTION MAP

**JUCS** Engineering & Consulting, Inc.  
4168 IVY STREET, SUITE A  
MIRABELITA, CA 92561  
TEL 951.384.9552 FAX 951.384.3568

# PRELIMINARY TENTATIVE TRACT MAP 37294 COUNTY OF RIVERSIDE, STATE OF CALIFORNIA CLINTON KEITH ROAD HEC-RAS SECTION MAP

THE HEC-RAS SECTION FOR CLINTON KEITH ROAD, PRELIMINARY DESIGN ELEVATE THE WATER SURFACE ELEVATION FOR THE EXISTING LEON ROAD CULVERT APPROXIMATELY 3 FEET. IT IS RECOMMENDED THAT THE CLINTON KEITH ROAD IMPROVEMENTS ADDRESS IMPACTS TO UPSTREAM STORM DRAIN AND BASINS.

LEGEND

	SECTION NUMBER
	PRE-PROJECT HEC-RAS
	CROSS SECTION - SECTION LINE
	CHANNEL CENTERLINE
	PRE-PROJECT FLOOD PLAIN LIMITS
	FLOOD PLAIN LIMITS

NOTE  
HEC-RAS SECTION ARE BASED ON TOPOGRAPHY OBTAINED FROM POND AND ROAD. TOPOGRAPHIC MAPPING IS ON NAD83. DESIGN FOR TRACT MAP IS ON NAD28. THE VERTICAL DIFFERENCE BETWEEN DATUMS IS 2.38 FT.  
IF PRE-PROJECT FLOOD PLAIN NOT SHOWN IT IS DUE TO THE FLOOD PLAINS BEING IN APPROXIMATELY THE SAME ALIGNMENT.

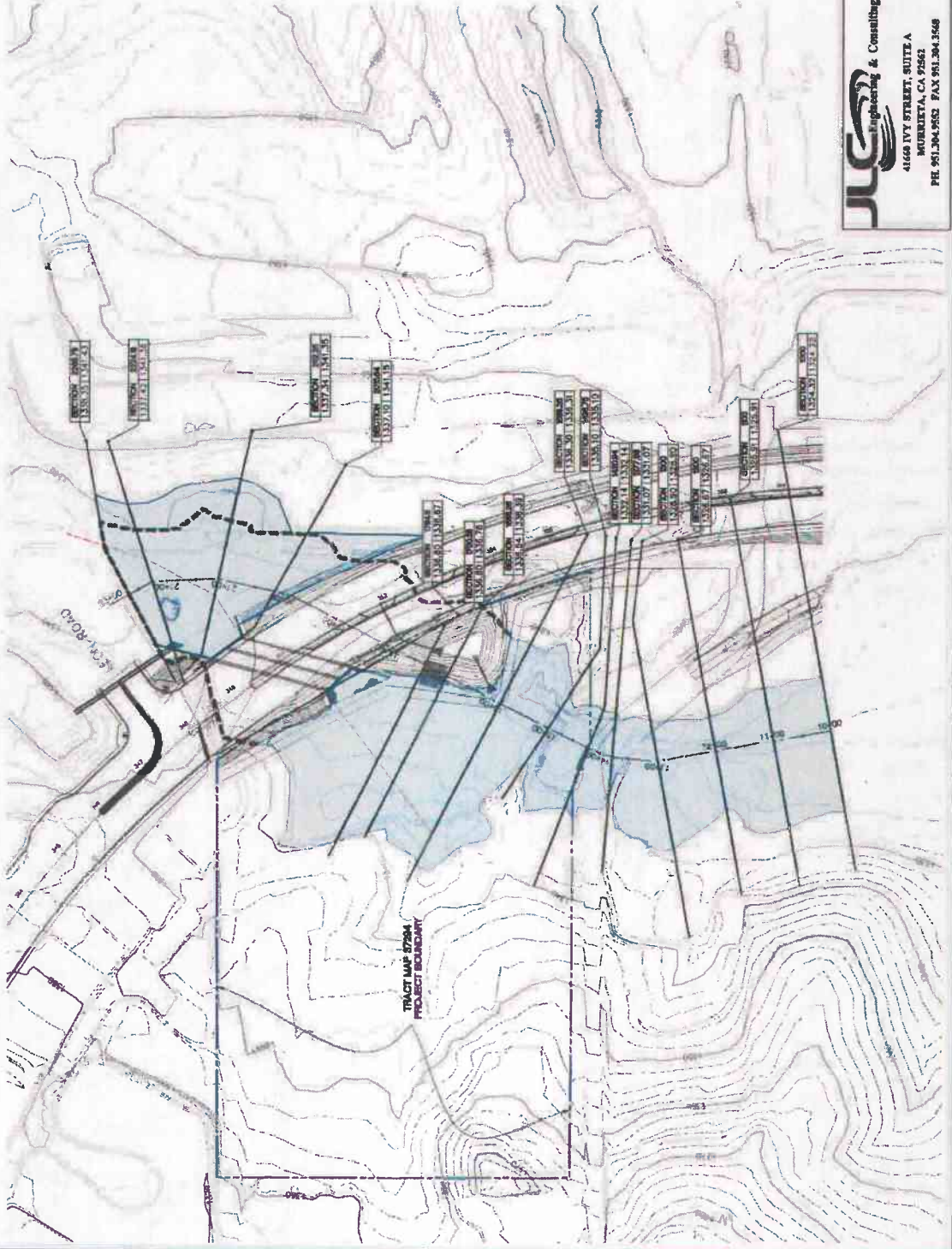


EXHIBIT 'X-2'  
TTM NO. 37294

CLINTON KEITH ROAD  
HEC-RAS SECTION MAP



4166 IVY STREET, SUITE A  
MURRETTA, CA 92562  
PH: 951.364.9552 FAX: 951.364.3468



## **Memorandum of Understanding**

**Date:** February 23, 2018  
**To:** Tom Braun, P.E.  
**From:** Joseph L. Castaneda, P.E.  
**Re:** HEC-RAS Analysis for Tract Map 37294

---

On behalf of Newland Homes, JLC Engineering has prepared this memorandum to document the HEC-RAS Analyses for the 100 year flow rates and to determine a pre-project and post-project condition for the existing flood plain. The flow rate for the hydraulic analysis was obtained from the approved Drainage Report prepared by RBF Consulting for Tract Map 29484. The flow rate used in the analyses was 1,920 cfs.

The HEC-RAS Analysis utilized topographic mapping obtained from Rancho California Water District which is on NAVD88. The tract map topographic mapping is based on NGVD29 which is lower by 2.38 feet.

The following has been provided as part of the analyses:

1. Exhibit X HEC-RAS Work Map
2. Pre-Project HEC-RAS Results and Cross Sections
3. Post-Project HEC-RAS Results and Cross Sections
4. Post-Project HEC-RAS Results and Cross Sections for Velocity

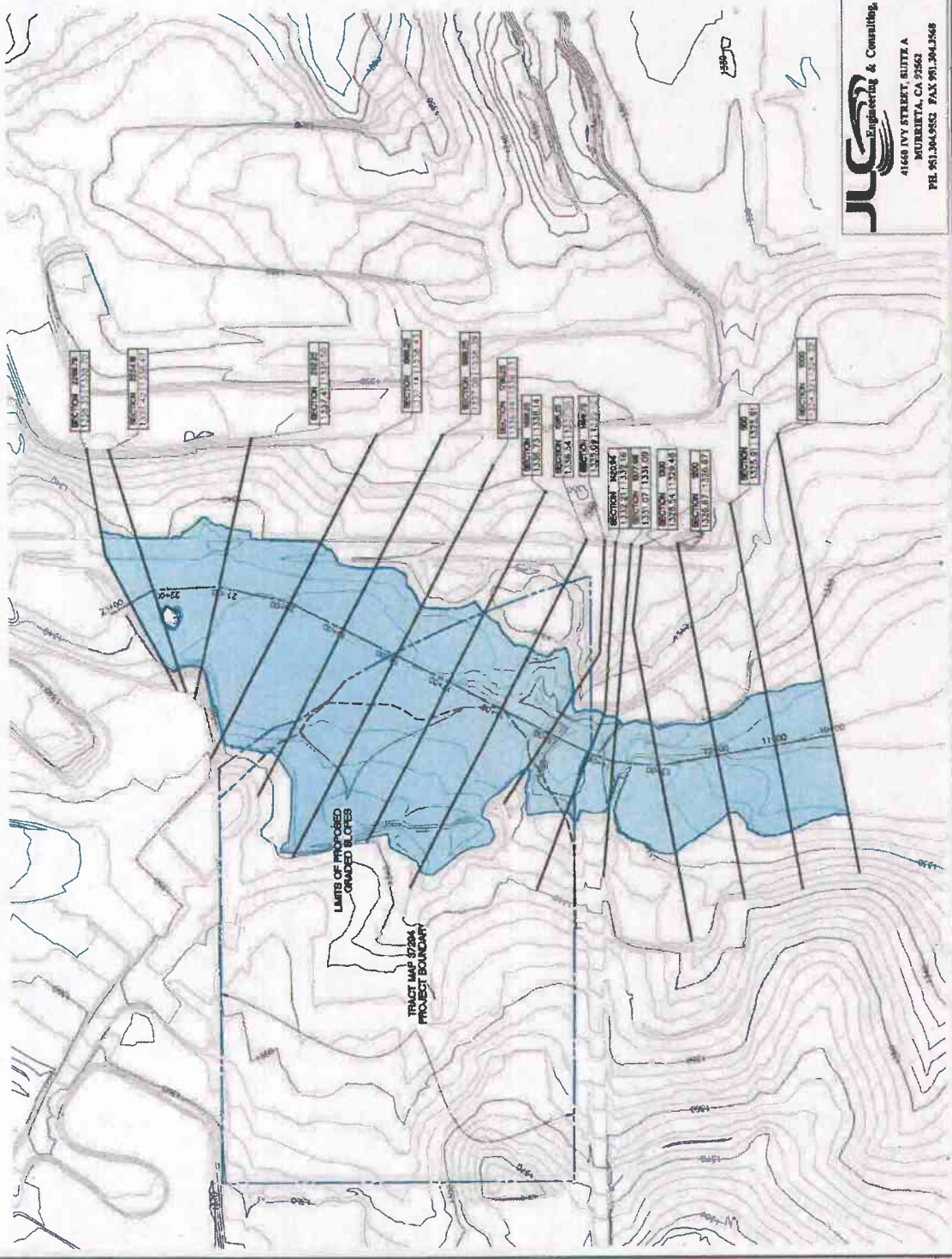
Please do not hesitate to call me with any questions at 951.304.9552.



**EXHIBIT X**

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# PRELIMINARY TENTATIVE TRACT MAP 37294 COUNTY OF RIVERSIDE, STATE OF CALIFORNIA EXISTING HEC-RAS SECTION MAP



**LEGEND:**

- SECTION NUMBER
- CROSS SECTION - SECTION LINE
- CHANNEL CENTERLINE
- FLOOD PLAIN LIMITS

**NOTE:**  
HEC-RAS SECTION ARE BASED ON TOPOGRAPHY OBTAINED FROM RCWD AND RCPOD. TOPOGRAPHIC MAPPING IS ON NAD83. DESIGN FOR TRACT MAP IS ON NAD83. THE VERTICAL DIFFERENCE BETWEEN DATUMS IS 2.38 FT.



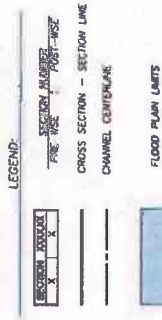
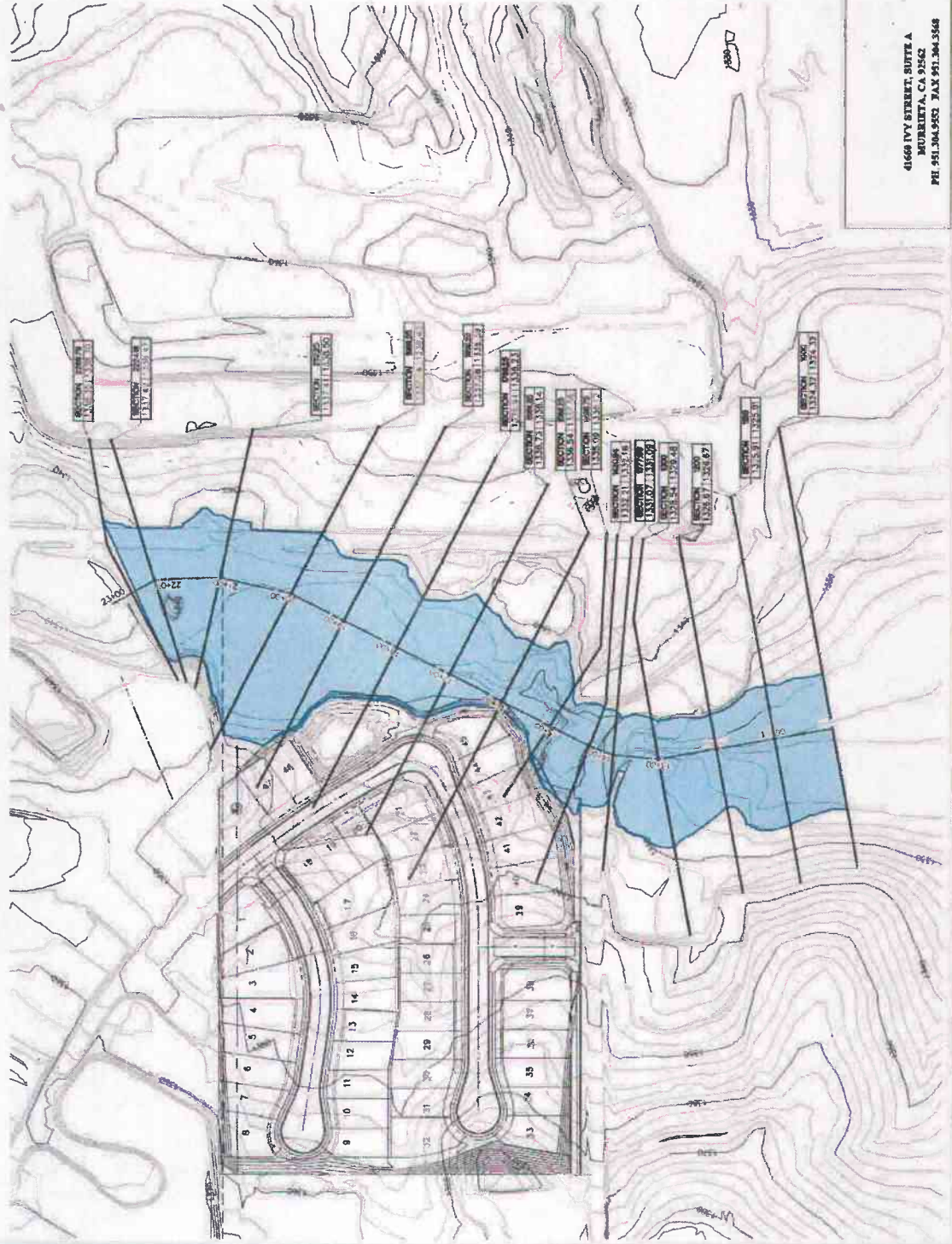
**EXHIBIT "X-1"**  
TTM NO. 37294  
EXISTING HEC-RAS  
SECTION MAP

**JUC**  
Engineering & Consulting, Inc.  
4160 IVY STREET, SUITE A  
MURRIETA, CA 92563  
TEL: 951.394.8852 FAX: 951.394.1668

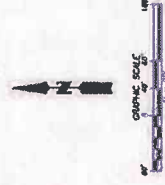


# TRACT MAP 37294 COUNTY OF RIVERSIDE, STATE OF CALIFORNIA PROPOSED HEC-RAS SECTION MAP

SHEET 1 OF 1



**NOTE:**  
HEC-RAS SECTION ARE BASED ON  
TOPOGRAPHY OBTAINED FROM RCMD AND  
RCRCD. TOPOGRAPHIC MAPPING IS ON  
NAD83. DESIGN FOR TRACT MAP IS ON  
NAD28. THE VERTICAL DIFFERENCE  
BETWEEN DATUMS IS 2.98 FT.



**EXHIBIT 'X'**  
**TRACT MAP 37294**  
**PROPOSED HEC-RAS**  
**SECTION MAP**

41669 IVY STREET, SUITE A  
MURRIETA, CA 92562  
PH 951.304.5453 FAX 951.304.5568

**PRE-PROJECT HEC-RAS**

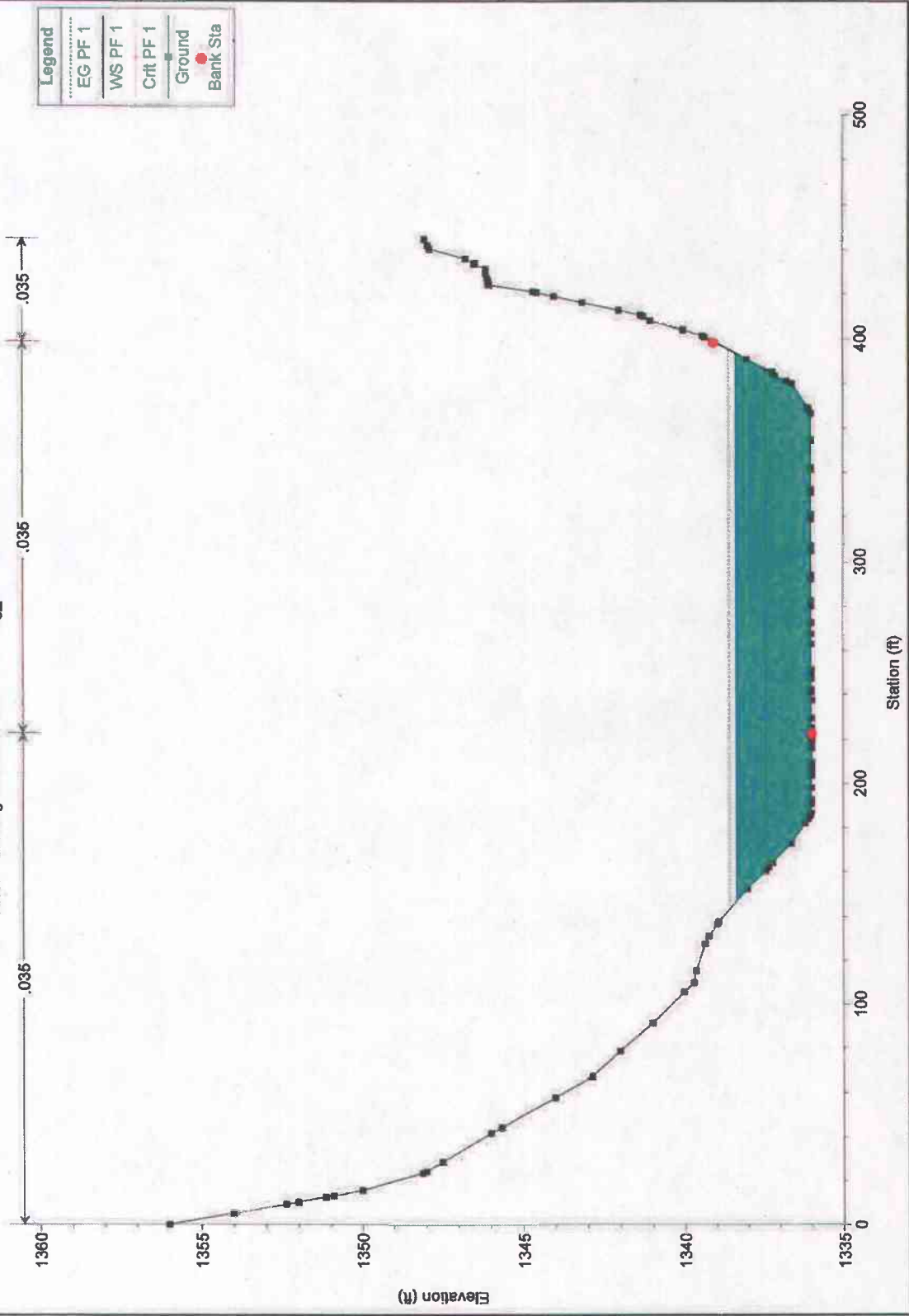
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HEC-RAS Plan: Plan 01 River: Existing\_Stream Reach: Existing\_Stream Profile: PF 1

Reach	River Sta	Profile	Q Total (cfs)	Min Ch El (ft)	W.S. Elev (ft)	Crit W.S. (ft)	E.G. Elev (ft)	E.G. Slope (ft/ft)	Vel Chnl (ft/s)	Flow Area (sq ft)	Top Width (ft)	Froude # Chl
Existing_Stream	1000	PF 1	1920.00	1321.88	1324.32	1324.32	1325.01	0.028243	4.09	311.77	236.31	0.48
Existing_Stream	1100	PF 1	1920.00	1322.00	1325.91	1324.77	1326.16	0.006025	2.59	534.99	242.31	0.25
Existing_Stream	1200	PF 1	1920.00	1322.00	1326.67	1326.67	1327.58	0.028076	5.04	279.87	162.65	0.52
Existing_Stream	1300	PF 1	1920.00	1323.99	1328.54	1329.02	1330.11	0.141794	10.25	191.84	152.74	1.14
Existing_Stream	1377.66	PF 1	1920.00	1328.81	1331.07	1331.07	1332.07	0.009077	9.63	256.30	146.27	1.35
Existing_Stream	1420.94	PF 1	1920.00	1328.00	1332.21	1330.80	1332.46	0.004429	4.00	489.05	181.07	0.40
Existing_Stream	1496.75	PF 1	1920.00	1328.00	1335.09	1335.09	1336.22	0.066348	6.23	253.33	151.66	0.74
Existing_Stream	1588.25	PF 1	1920.00	1331.91	1336.54		1336.68	0.001337	1.34	757.70	342.21	0.12
Existing_Stream	1688.25	PF 1	1920.00	1332.07	1336.73		1336.87	0.002867	1.94	731.22	309.27	0.18
Existing_Stream	1786.25	PF 1	1920.00	1333.95	1336.94		1337.06	0.001273	1.10	768.69	327.52	0.11
Existing_Stream	1888.25	PF 1	1920.00	1333.98	1337.08		1337.16	0.000808	0.90	887.75	332.65	0.09
Existing_Stream	1988.25	PF 1	1920.00	1333.99	1337.14		1337.30	0.001694	1.31	695.52	316.70	0.13
Existing_Stream	2112.25	PF 1	1920.00	1334.00	1337.41	1336.28	1337.67	0.004452	2.17	562.53	222.44	0.21
Existing_Stream	2224.18	PF 1	1920.00	1334.59	1337.42	1337.42	1338.20	0.024399	4.06	301.97	197.48	0.47
Existing_Stream	2286.79	PF 1	1920.00	1335.99	1338.35	1337.42	1338.57	0.002911	3.88	512.28	246.40	0.46

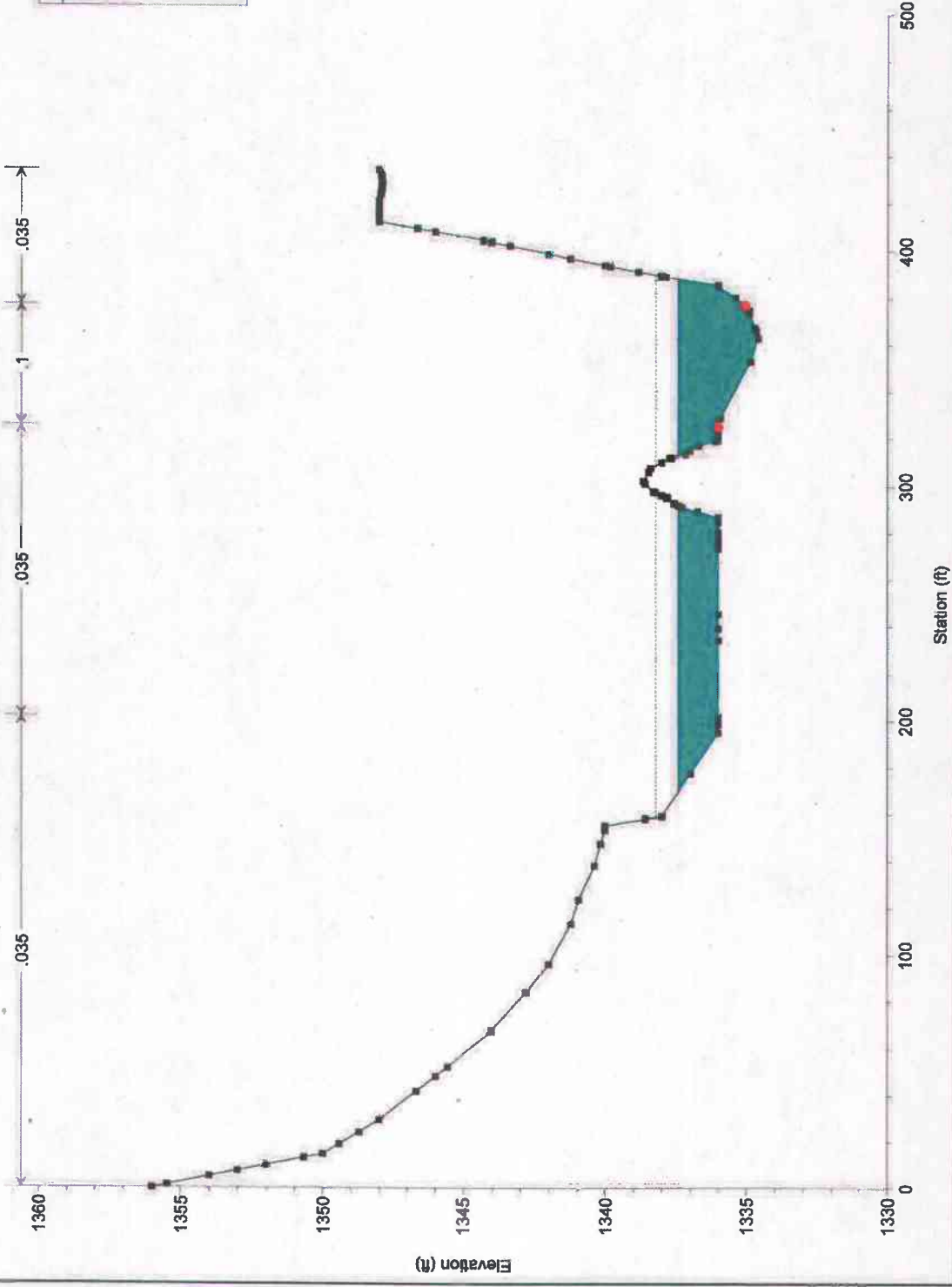
PRE-PROJECT CONDITION - Q100 Plan: Plan 01 12/3/2017

River = Existing Stream Reach = Existing\_Stream RS = 2266.79



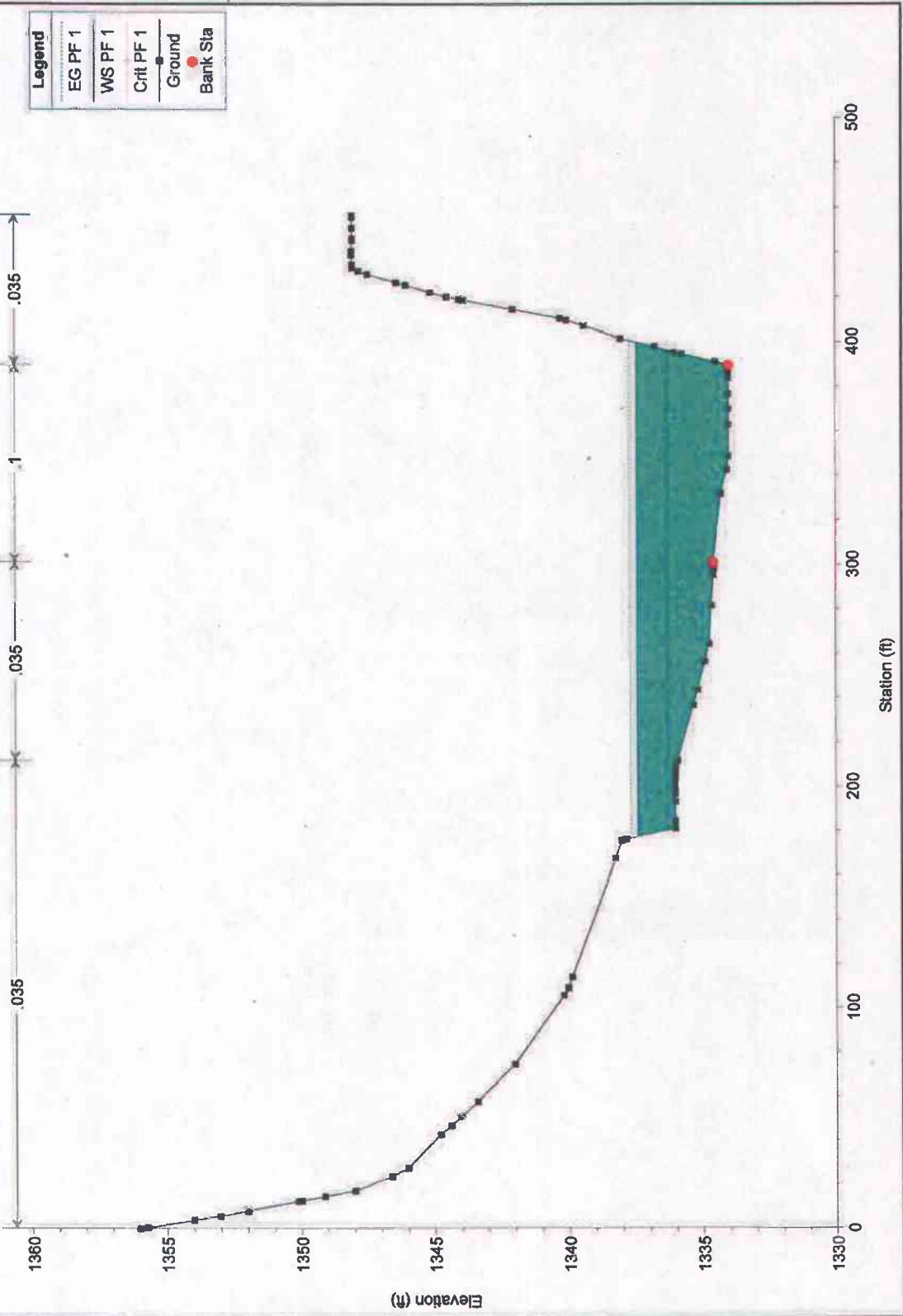
PRE-PROJECT CONDITION - Q100 Plan: Plan 01 12/3/2017

River = Existing Stream Reach = Existing\_Stream RS = 2224.18



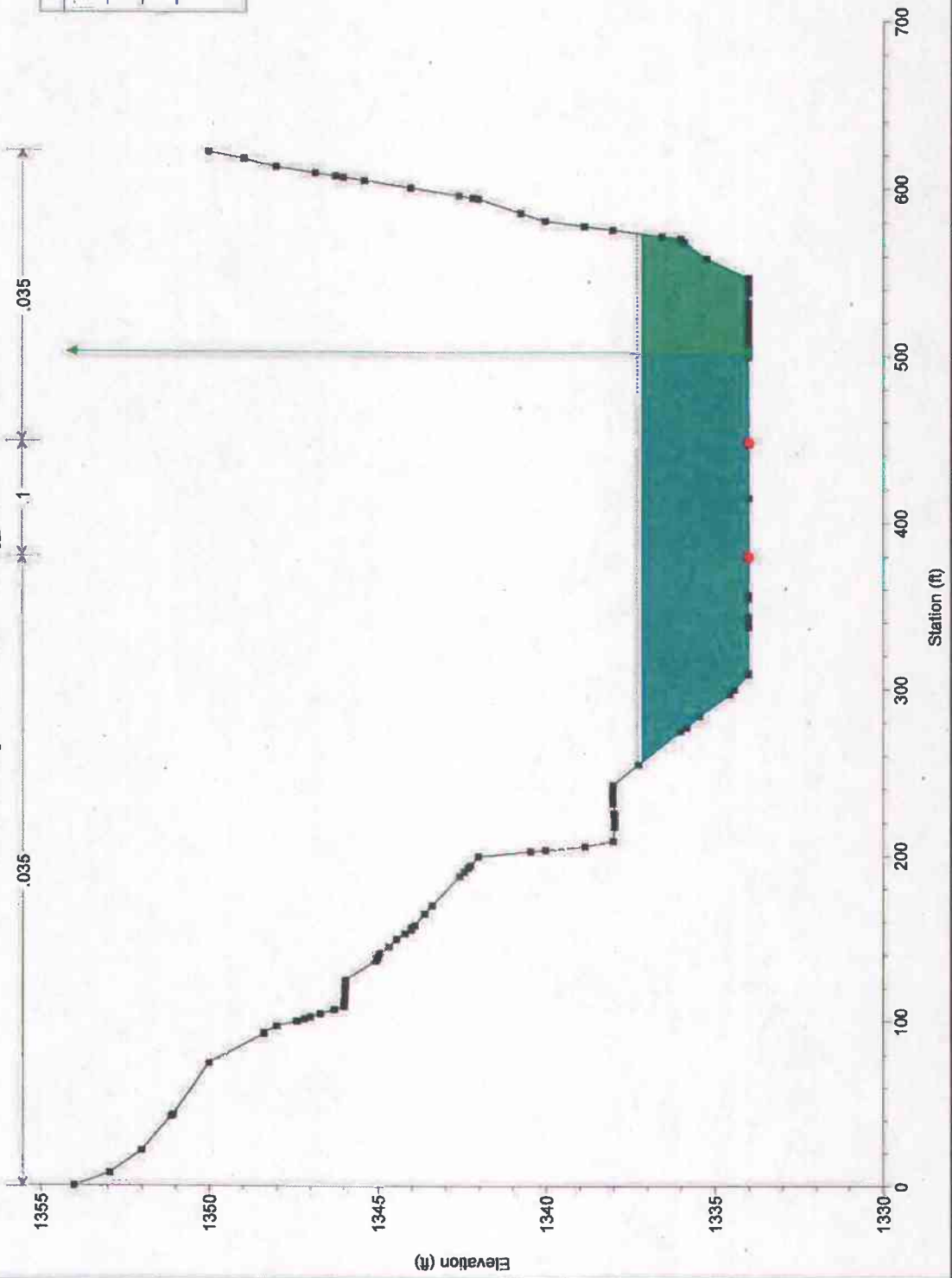
PRE-PROJECT CONDITION - Q100 Plan: Plan 01 12/3/2017

River = Existing Stream Reach = Existing\_Stream RS = 2112.25



PRE-PROJECT CONDITION - Q100 Plan: Plan 01 12/3/2017

River = Existing Stream Reach = Existing\_Stream RS = 1988.25



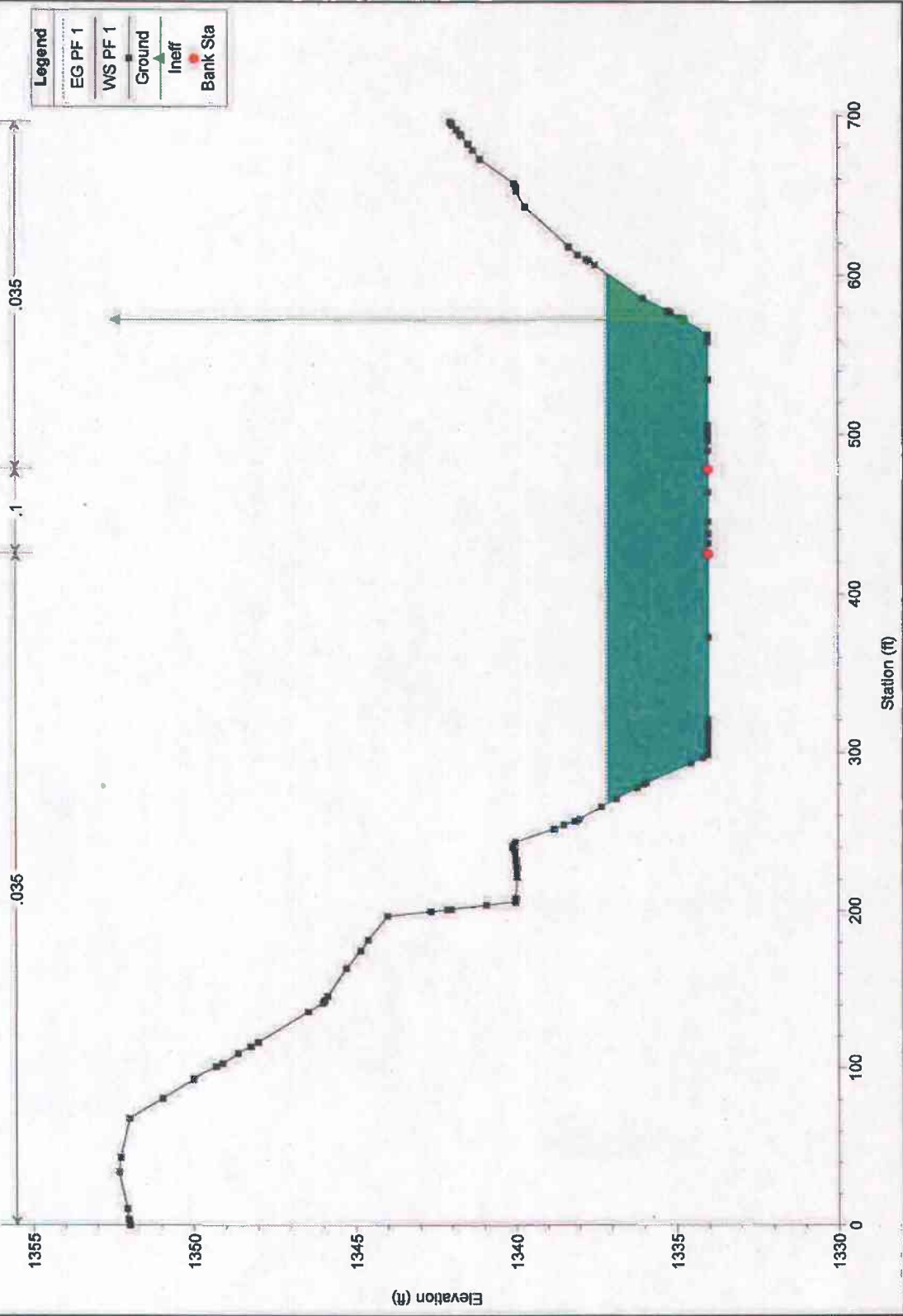
0.035 0.1 0.035

**Legend**

- EG PF 1
- WS PF 1
- Ground
- Ineff
- Bank Sta

PRE-PROJECT CONDITION - Q100 Plan: Plan 01 12/3/2017

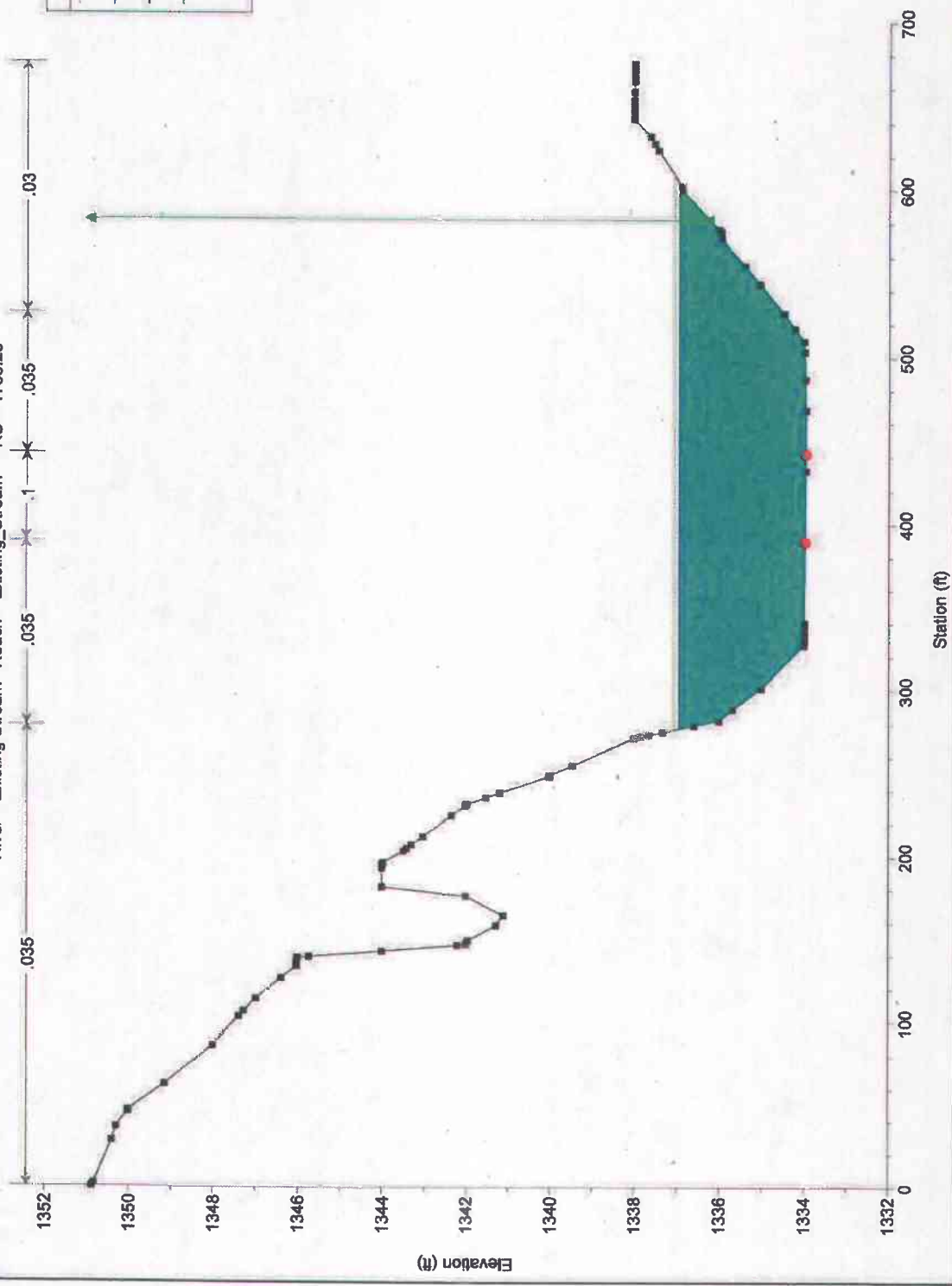
River = Existing Stream Reach = Existing\_Stream RS = 1888.25





PRE-PROJECT CONDITION - Q100 Plan: Plan 01 12/3/2017

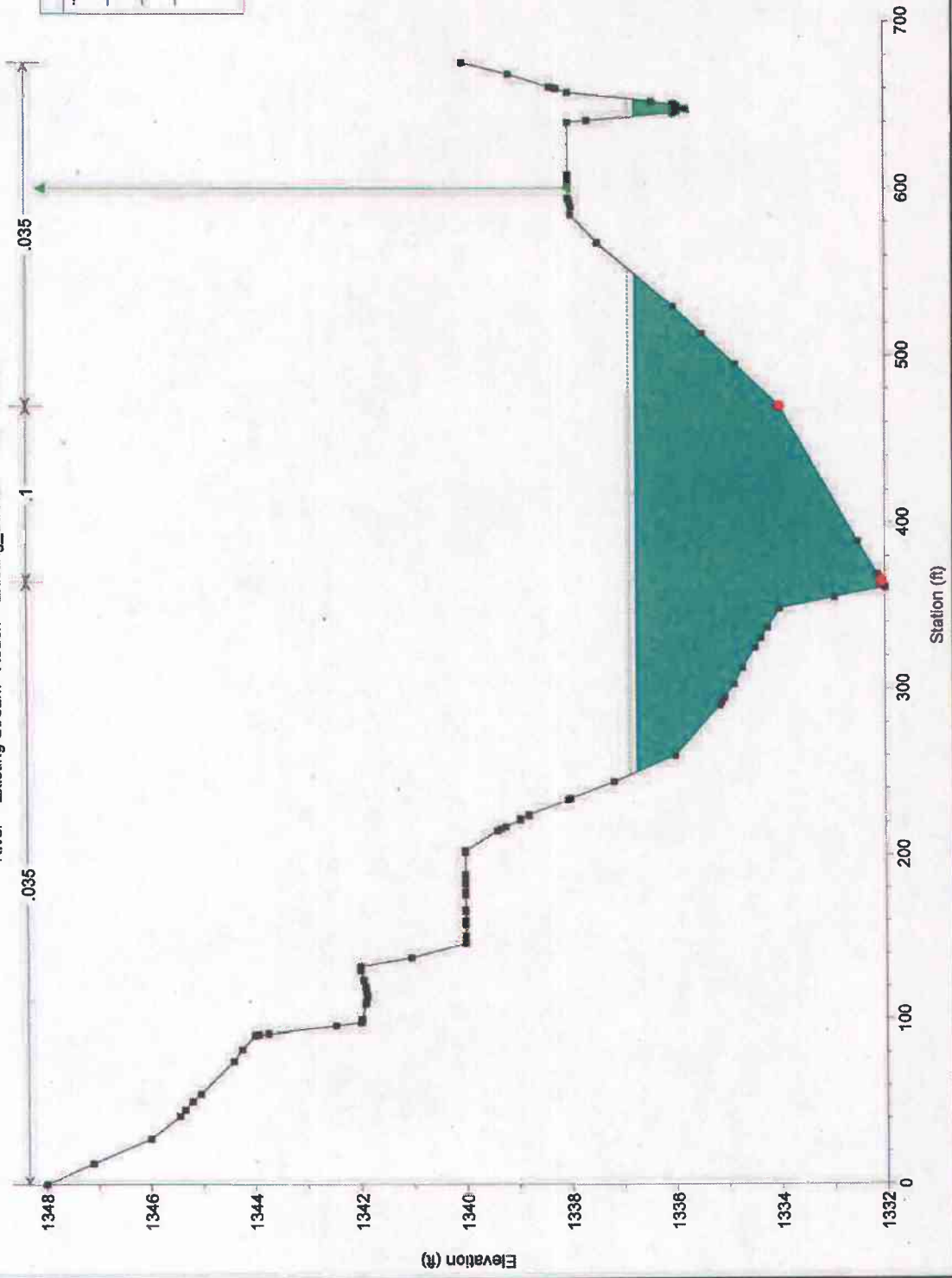
River = Existing Stream Reach = Existing\_Stream RS = 1788.25



**PRE-PROJECT CONDITION - Q100 Plan: Plan 01 12/3/2017**

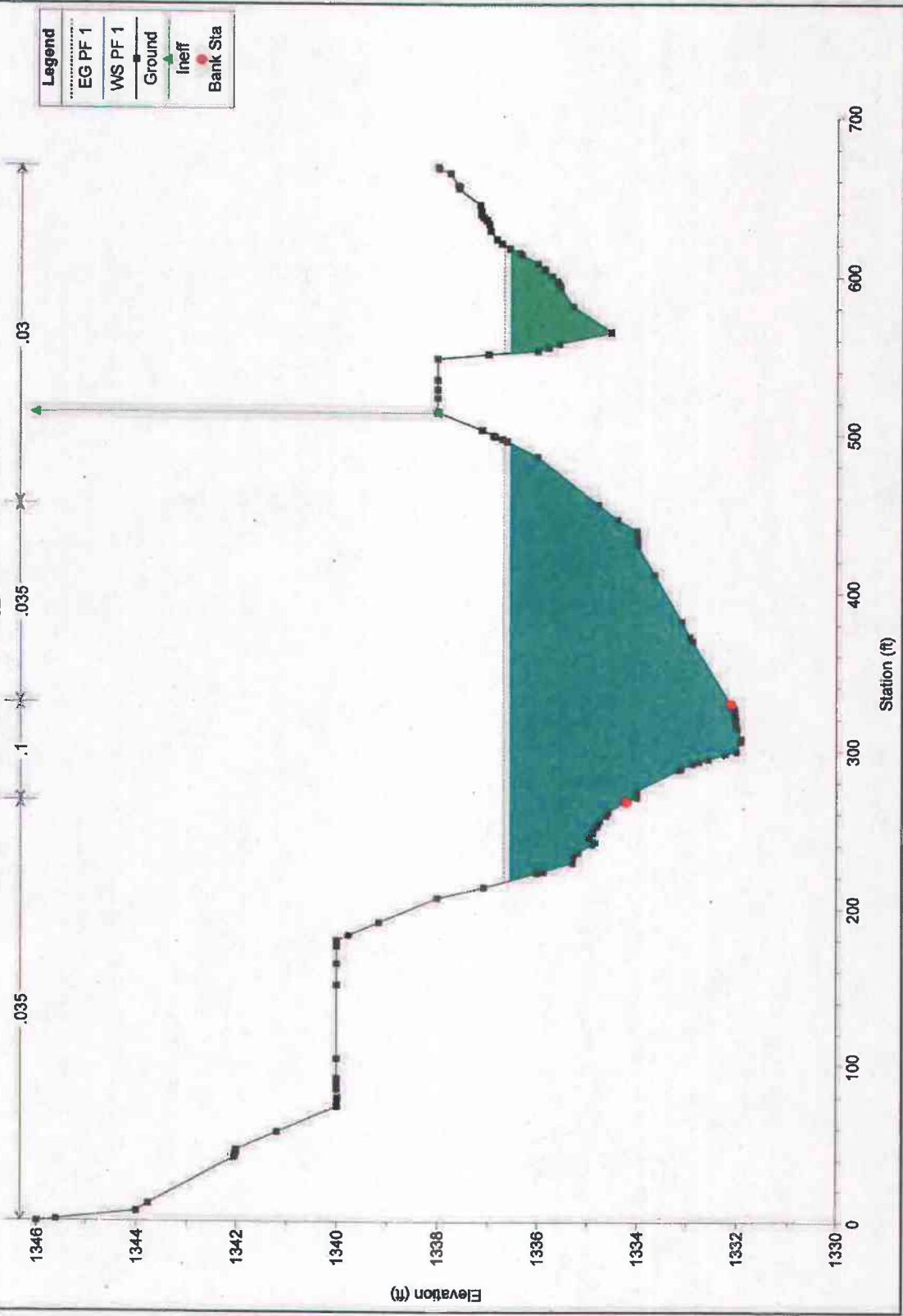
River = Existing Stream Reach = Existing\_Stream RS = 1688.25

Legend	
EG PF 1	(Symbol)
WS PF 1	(Symbol)
Ground	(Symbol)
Ineff	(Symbol)
Bank Sta	(Symbol)



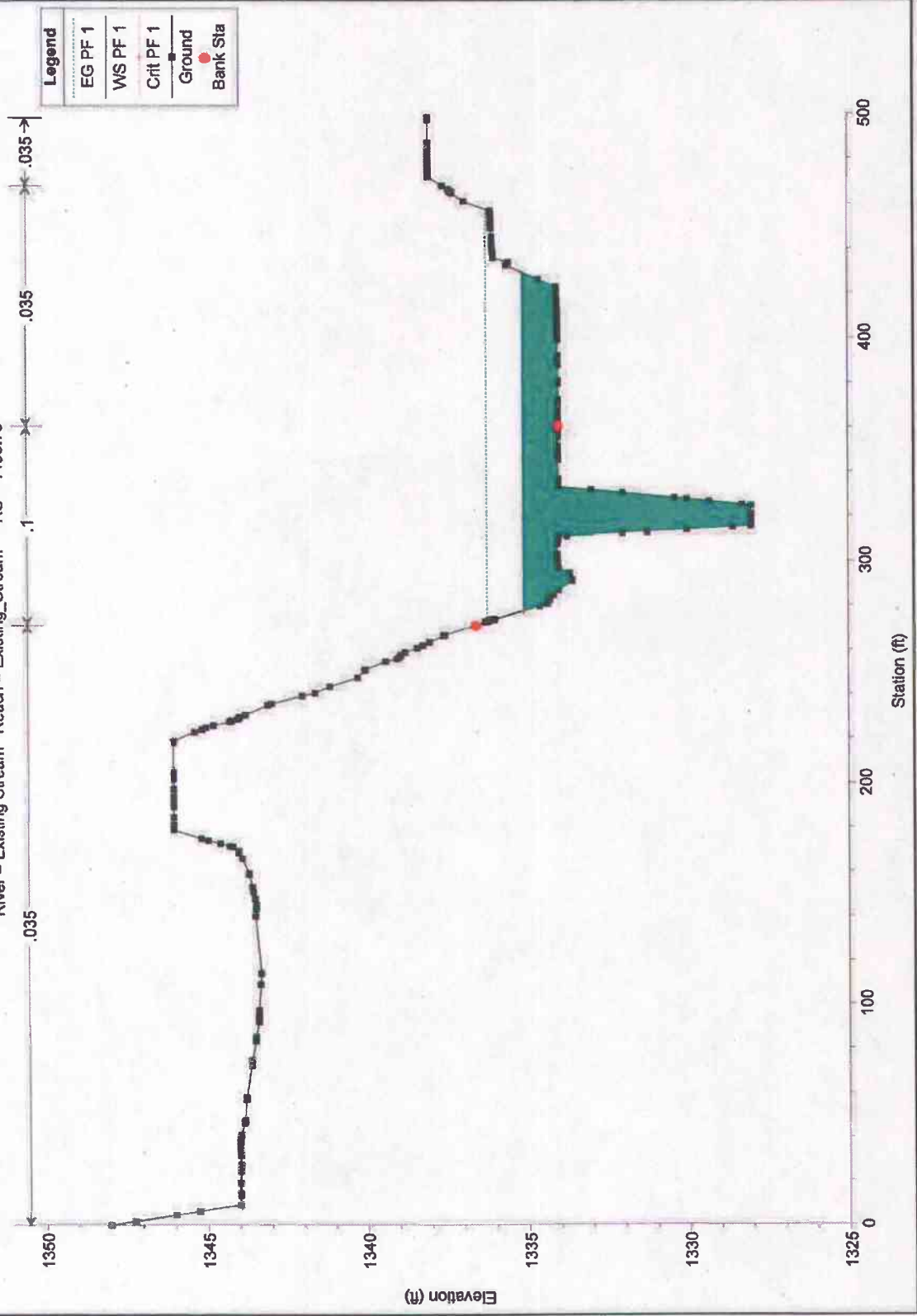
PRE-PROJECT CONDITION - Q100 Plan: Plan 01 12/3/2017

River = Existing Stream Reach = Existing\_Stream RS = 1588.25



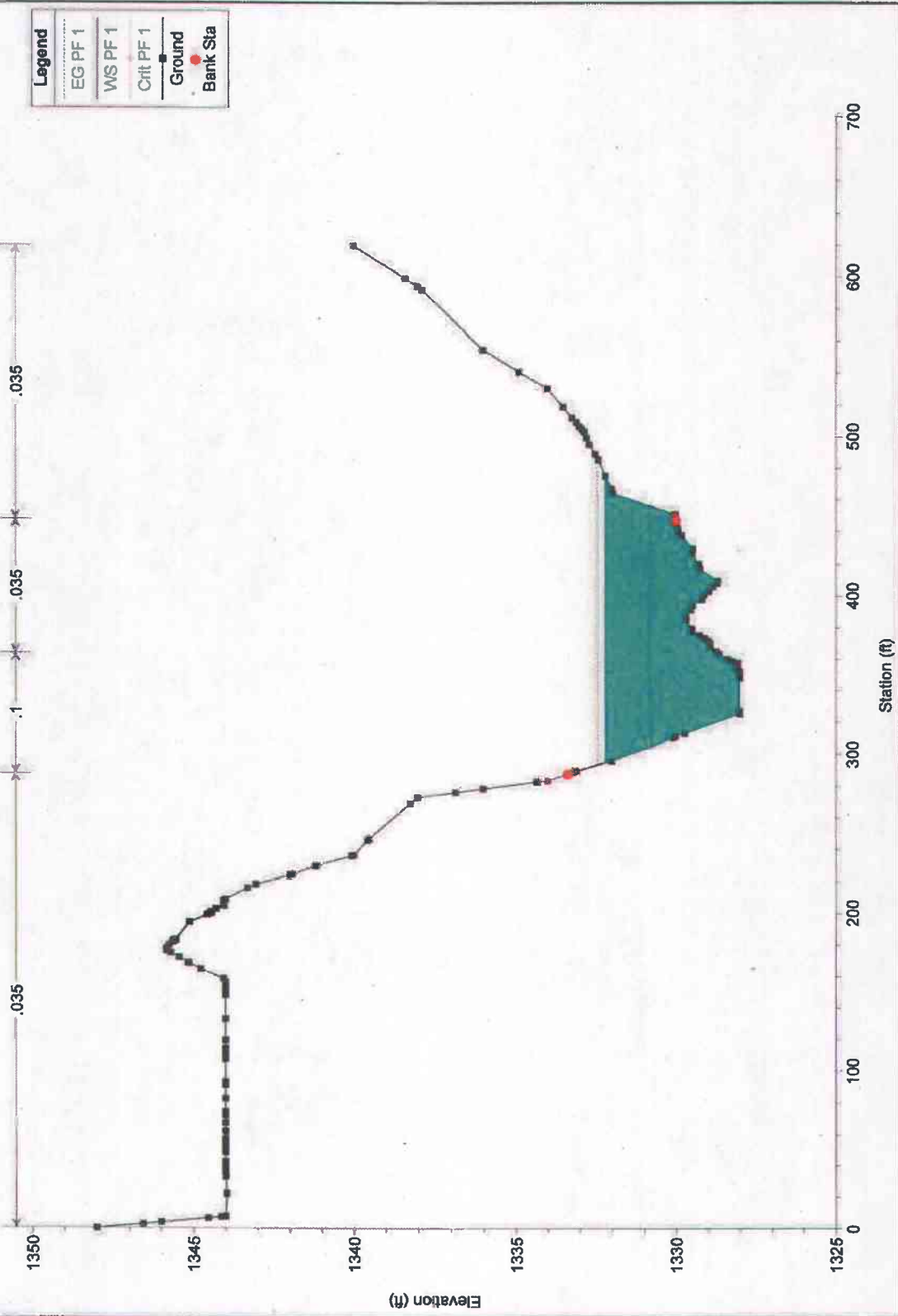
PRE-PROJECT CONDITION - Q100 Plan: Plan 01 12/3/2017

River = Existing Stream Reach = Existing\_Stream RS = 1496.75



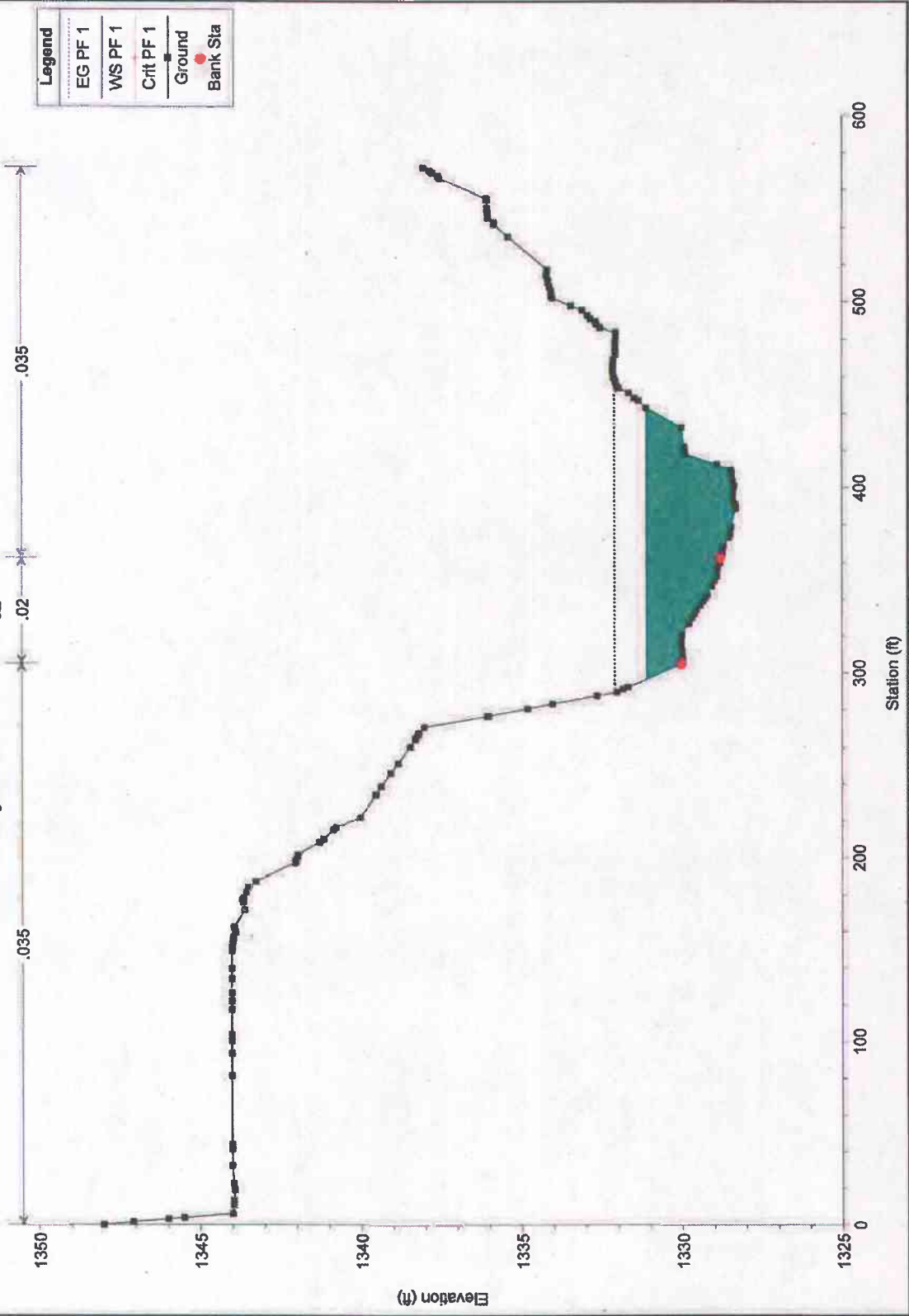
PRE-PROJECT CONDITION - Q100 Plan: Plan 01 12/3/2017

River = Existing Stream Reach = Existing\_Stream RS = 1420.94



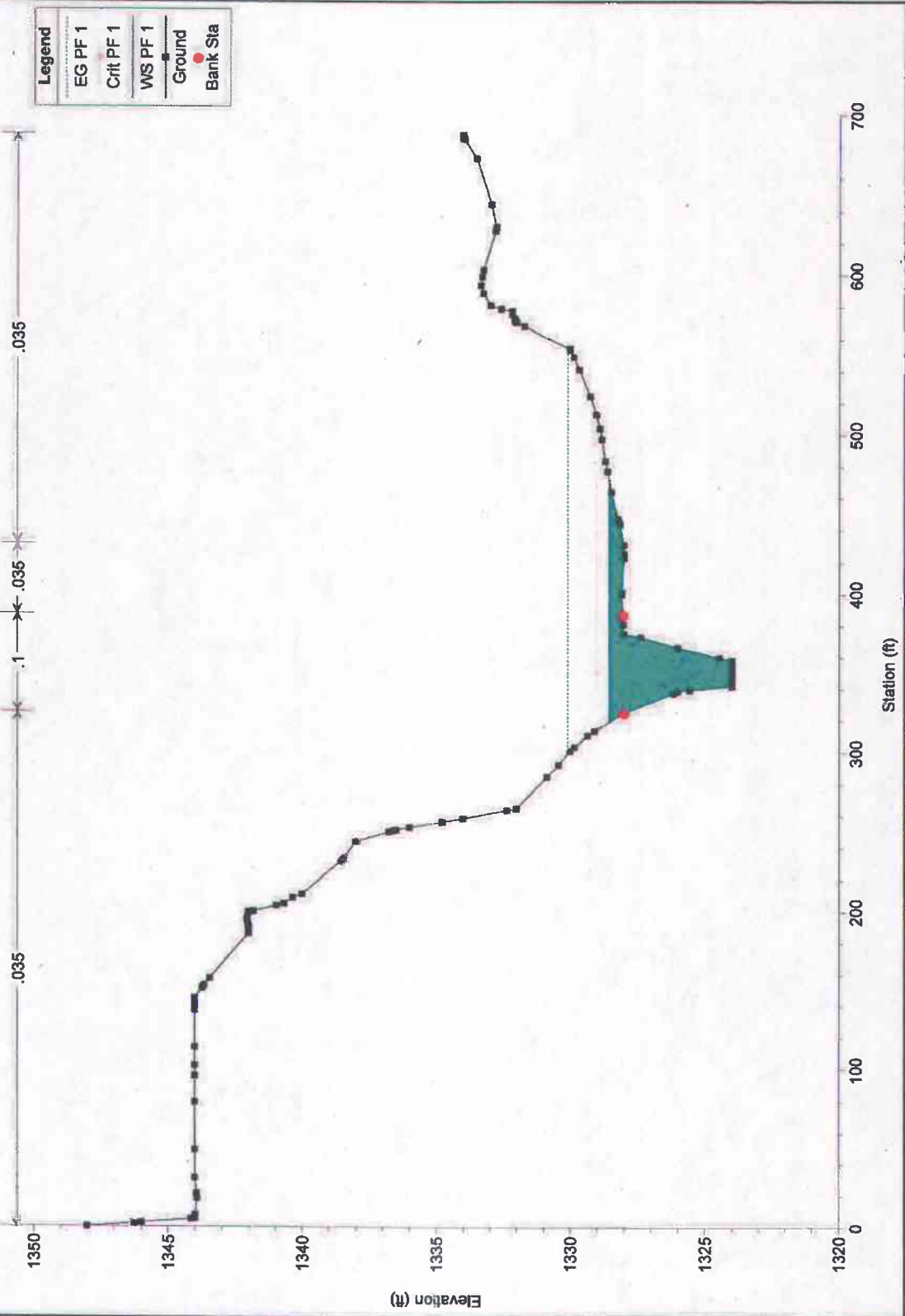
PRE-PROJECT CONDITION - Q100 Plan: Plan 01 12/3/2017

River = Existing Stream Reach = Existing\_Stream RS = 1377.66



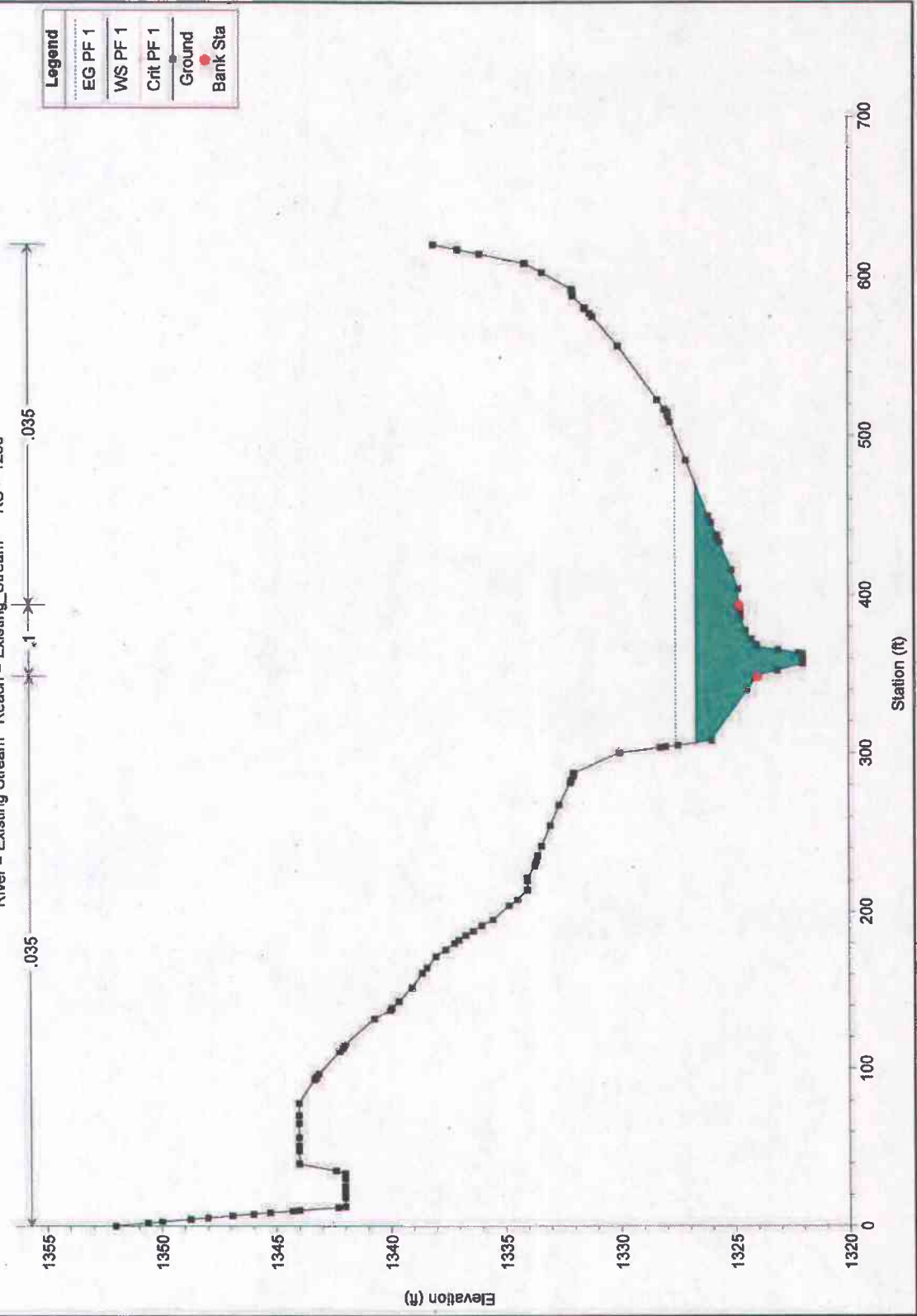
PRE-PROJECT CONDITION - Q100 Plan: Plan 01 12/3/2017

River = Existing Stream Reach = Existing Stream RS = 1300



PRE-PROJECT CONDITION - Q100 Plan: Plan 01 12/3/2017

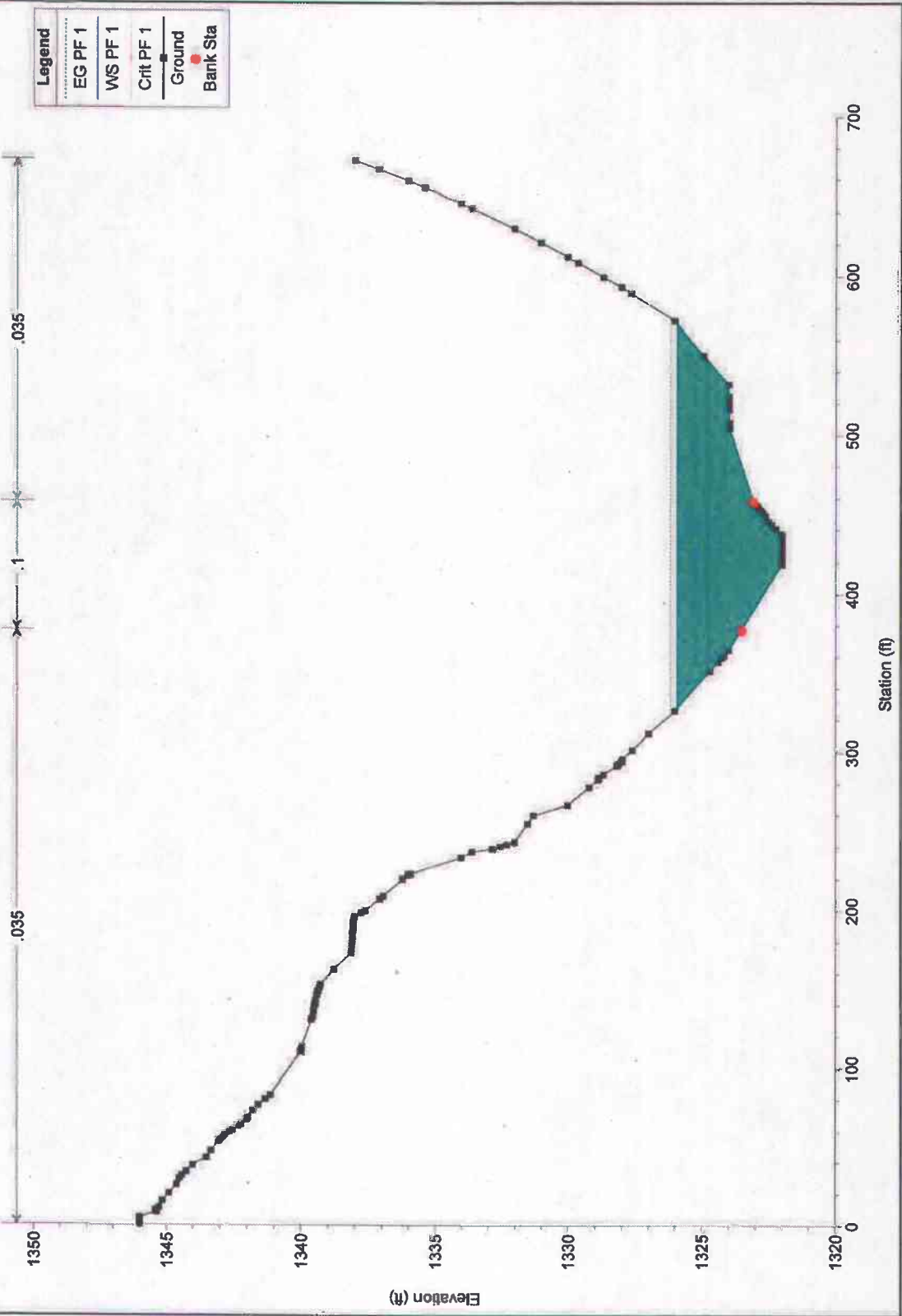
River = Existing Stream Reach = Existing Stream RS = 1200





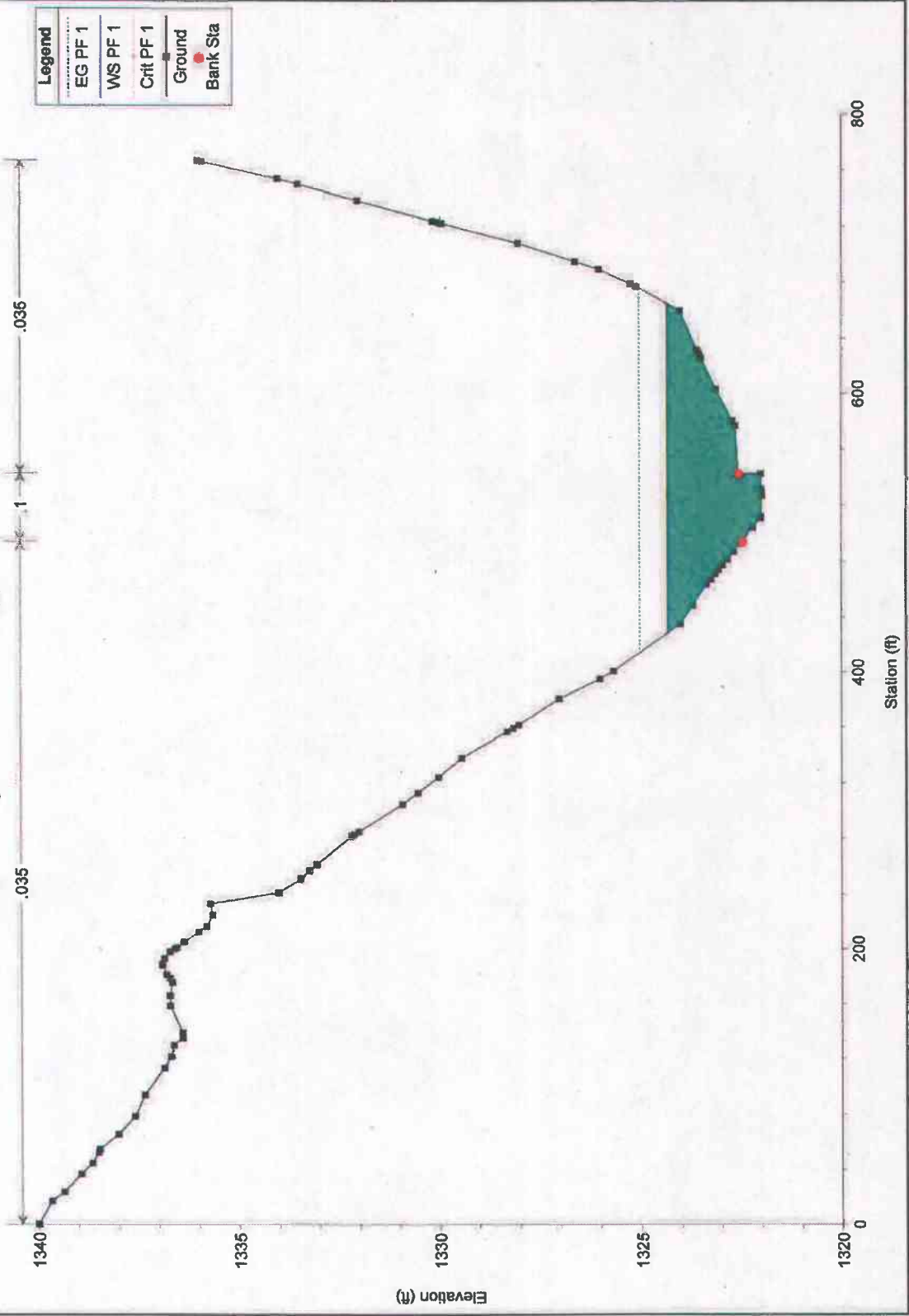
PRE-PROJECT CONDITION - Q100 Plan: Plan 01 12/3/2017

River = Existing Stream Reach = Existing\_Stream RS = 1100



PRE-PROJECT CONDITION - Q100 Plan: Plan 01 12/3/2017

River = Existing Stream Reach = Existing\_Stream RS = 1000



**POST PROJECT HEC-RAS**

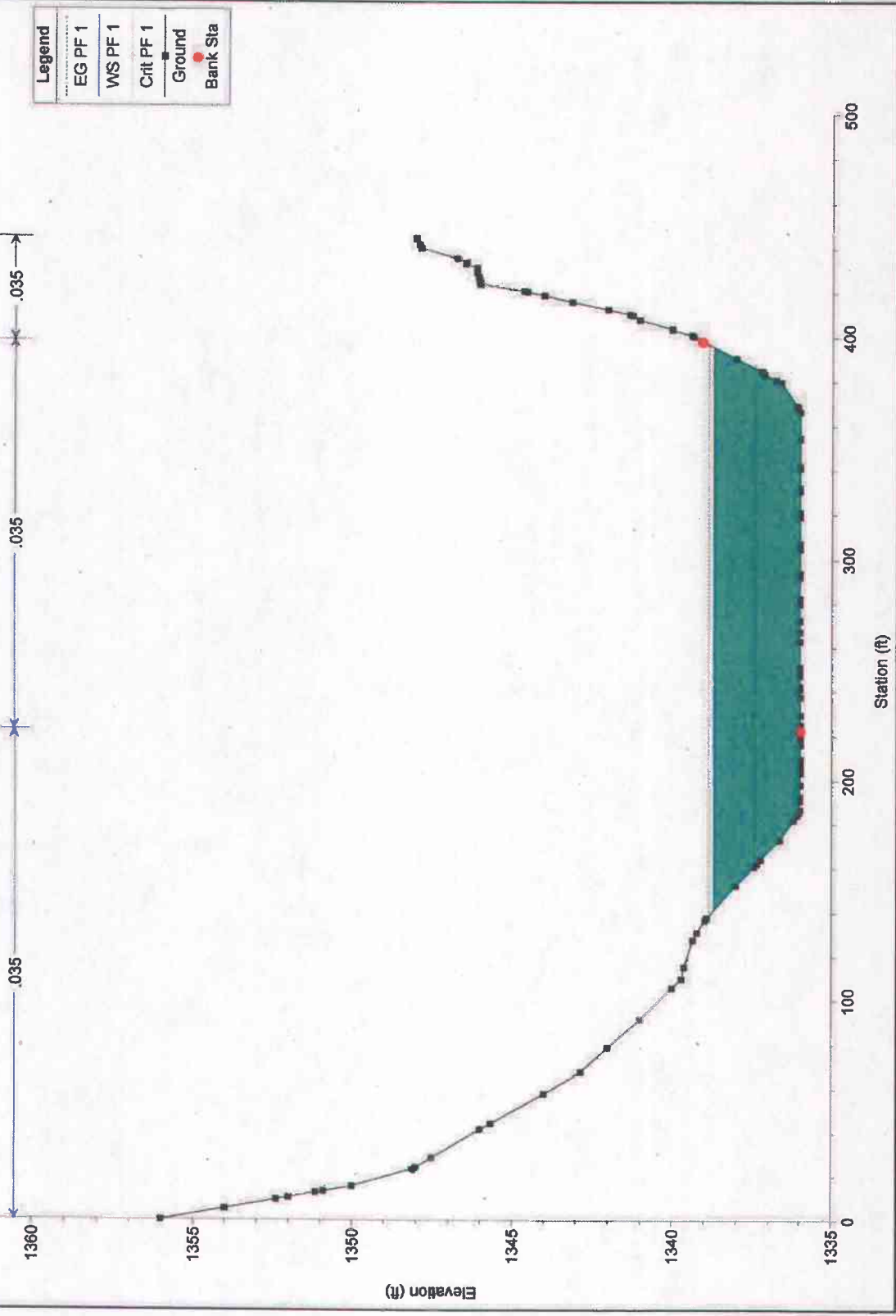
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HEC-RAS Plan: Plan 01 River: Existing Stream Reach: Existing Stream Profile: PF 1

Reach	River Sta	Profile	Q Total (cfs)	Min Ch El (ft)	W.S. Elev (ft)	Crit W.S. (ft)	E.G. Elev (ft)	E.G. Slope (ft/ft)	Vel Chnl (ft/s)	Flow Area (sq ft)	Top Width (ft)	Froude # Chl
Existing_Stream	1000	PF 1	1920.00	1321.98	1324.32	1324.32	1325.01	0.026243	4.09	311.77	236.31	0.48
Existing_Stream	1100	PF 1	1920.00	1322.00	1325.91	1324.77	1326.16	0.006025	2.59	534.99	242.31	0.25
Existing_Stream	1200	PF 1	1920.00	1322.00	1326.67	1326.67	1327.58	0.028076	5.04	279.87	162.65	0.52
Existing_Stream	1300	PF 1	1920.00	1323.99	1329.48	1329.02	1329.92	0.018217	4.54	375.04	225.76	0.43
Existing_Stream	1377.66	PF 1	1920.00	1328.61	1331.09	1331.09	1331.96	0.013639	6.80	259.05	146.59	0.95
Existing_Stream	1420.94	PF 1	1920.00	1328.00	1332.16	1330.80	1332.41	0.004893	4.07	479.79	178.58	0.41
Existing_Stream	1486.75	PF 1	1920.00	1328.00	1335.12	1335.12	1336.38	0.072516	6.57	243.40	136.58	0.77
Existing_Stream	1588.25	PF 1	1920.00	1331.91	1337.56		1337.98	0.007216	3.57	413.76	123.41	0.29
Existing_Stream	1688.25	PF 1	1920.00	1332.07	1338.14		1338.25	0.001209	1.55	828.14	219.33	0.12
Existing_Stream	1789.25	PF 1	1920.00	1333.95	1338.23		1338.38	0.001119	1.31	710.14	192.80	0.11
Existing_Stream	1888.25	PF 1	1920.00	1333.98	1338.39		1338.45	0.000349	0.75	1110.35	338.81	0.06
Existing_Stream	1988.25	PF 1	1920.00	1333.99	1338.43		1338.50	0.000547	0.94	1038.86	369.18	0.08
Existing_Stream	2112.25	PF 1	1920.00	1334.00	1338.50		1338.62	0.001331	1.44	811.56	244.29	0.12
Existing_Stream	2224.18	PF 1	1920.00	1334.59	1338.47		1338.72	0.004112	2.15	525.13	226.00	0.21
Existing_Stream	2268.79	PF 1	1920.00	1335.99	1338.70	1337.42	1338.86	0.001793	3.33	599.94	254.70	0.37

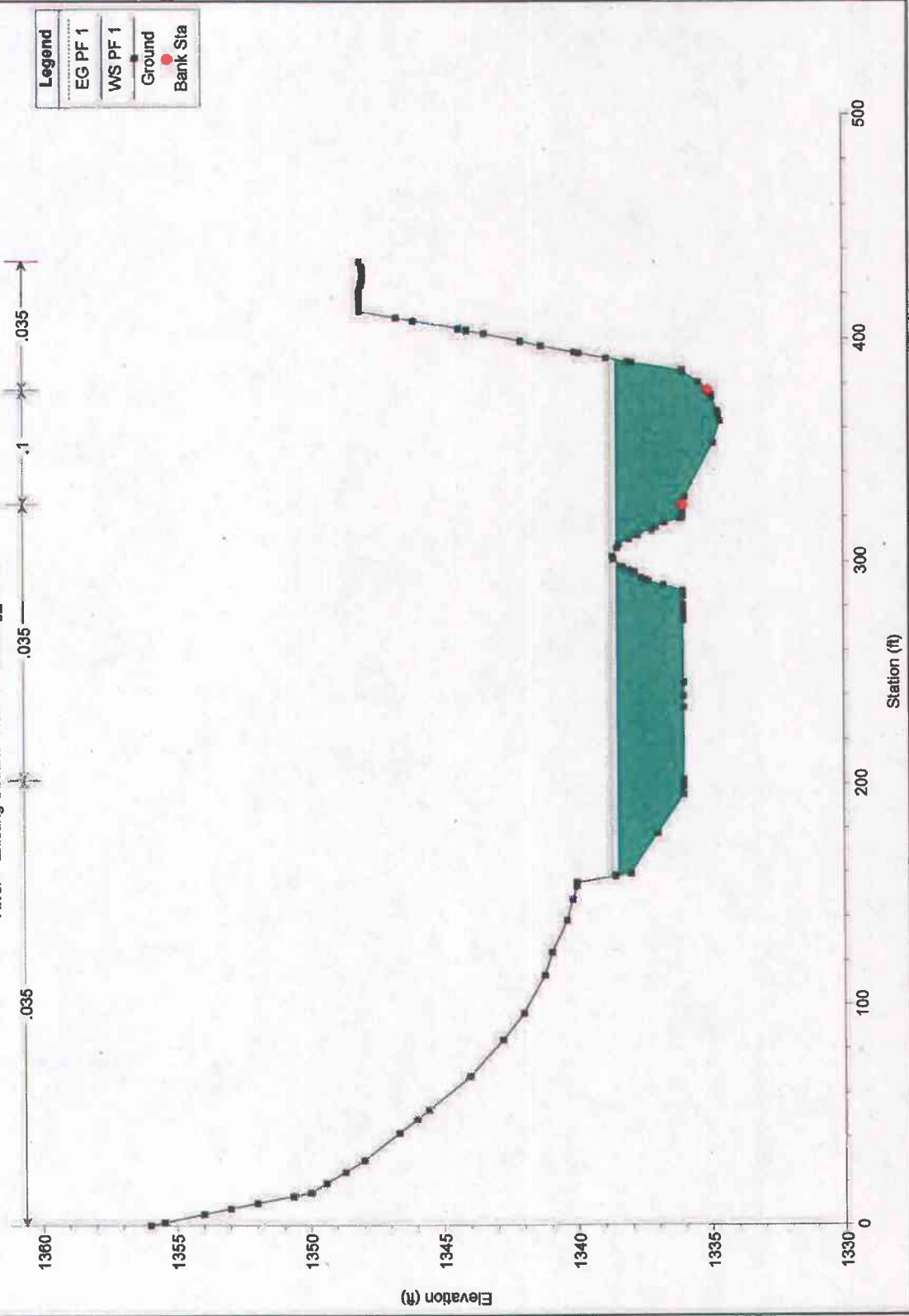
POST-PROJECT CONDITION - Q100 Plan: Plan 01 12/3/2017

River = Existing Stream Reach = Existing\_Stream RS = 2268.78



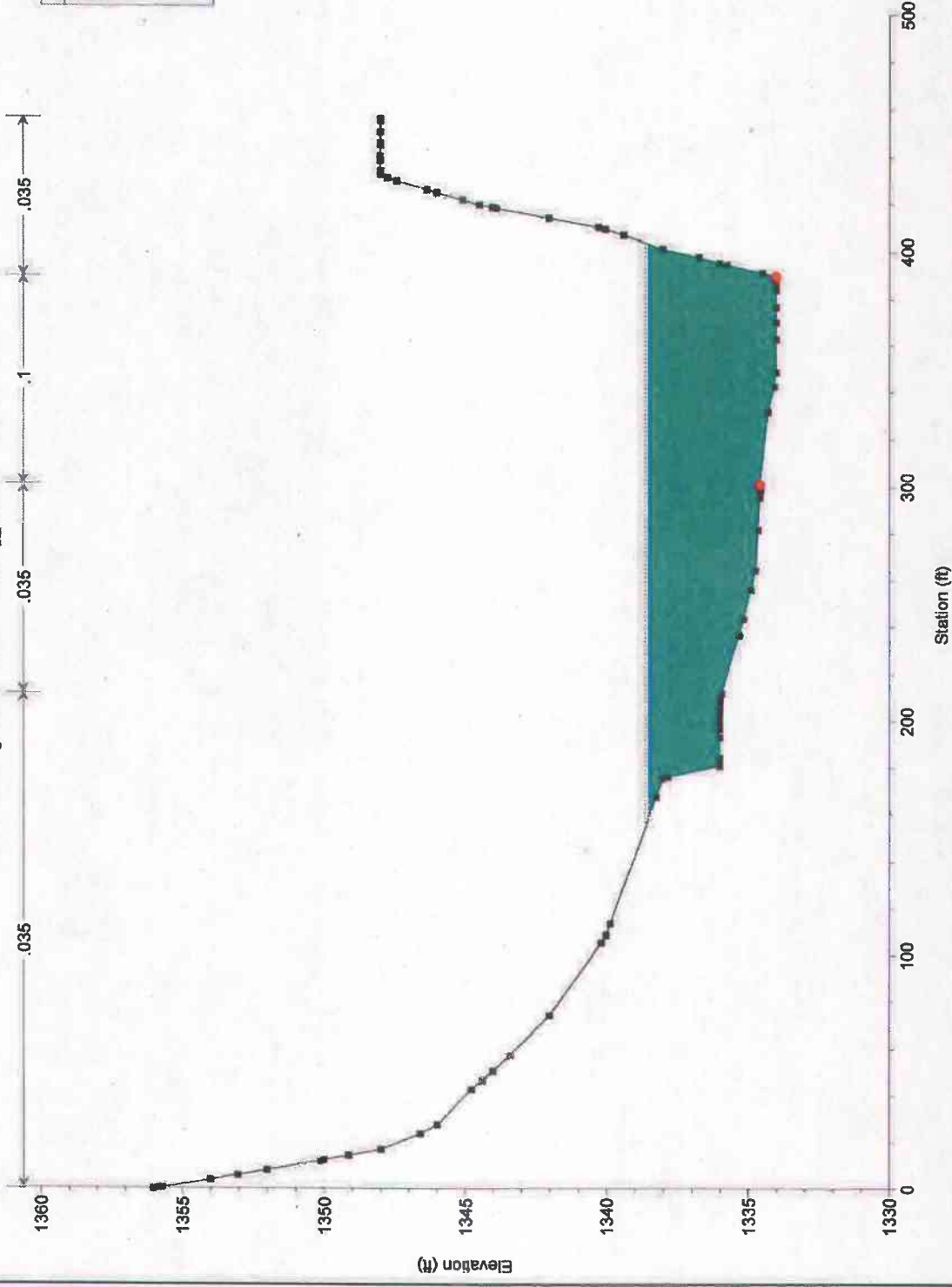
POST-PROJECT CONDITION - Q100 Plan: Plan 01 12/3/2017

River = Existing Stream Reach = Existing\_Stream RS = 2224.18



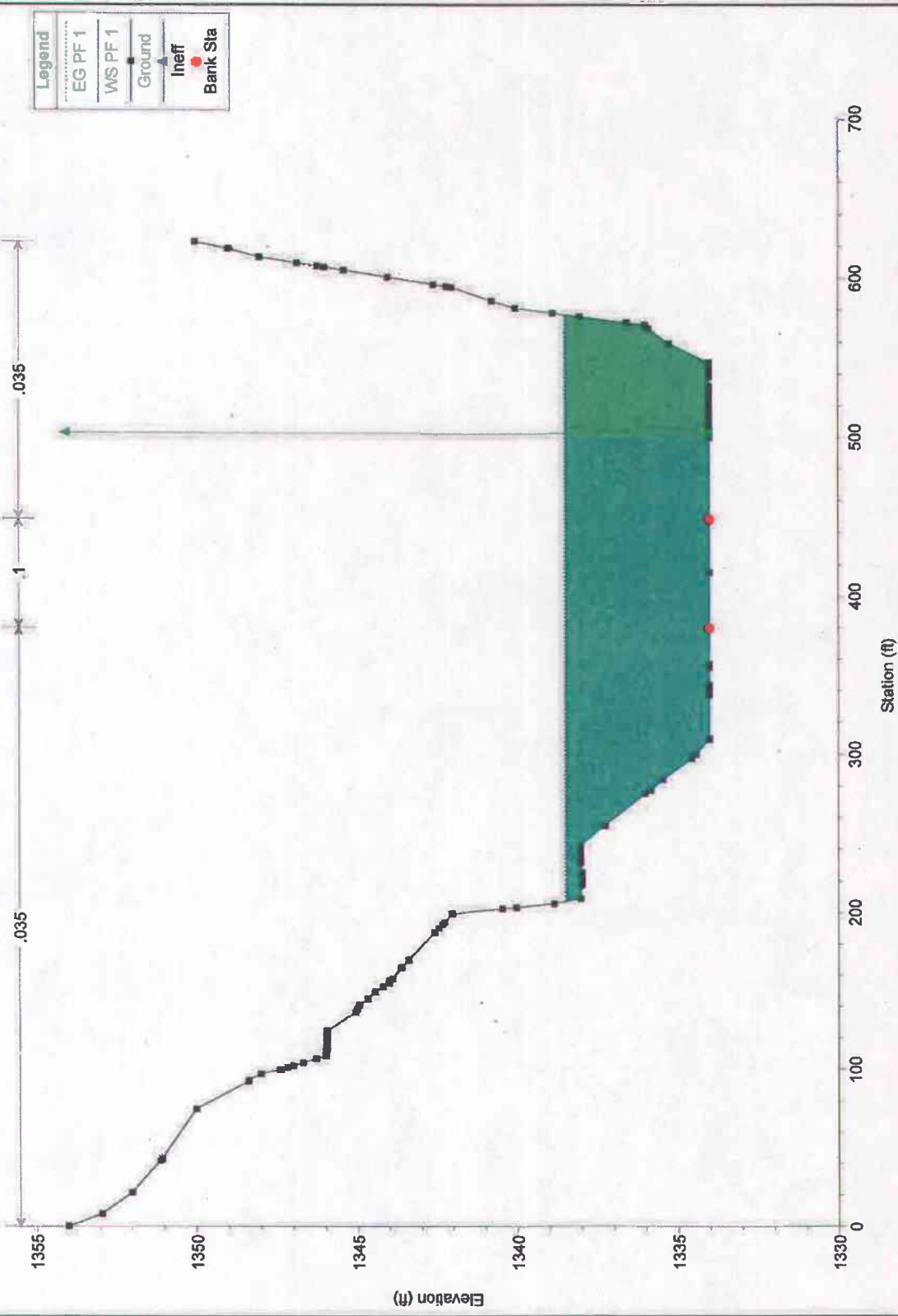
POST-PROJECT CONDITION - Q100 Plan: Plan 01 12/3/2017

River = Existing Stream Reach = Existing\_Stream RS = 2112.25



POST-PROJECT CONDITION - Q100 Plan: Plan 01 12/3/2017

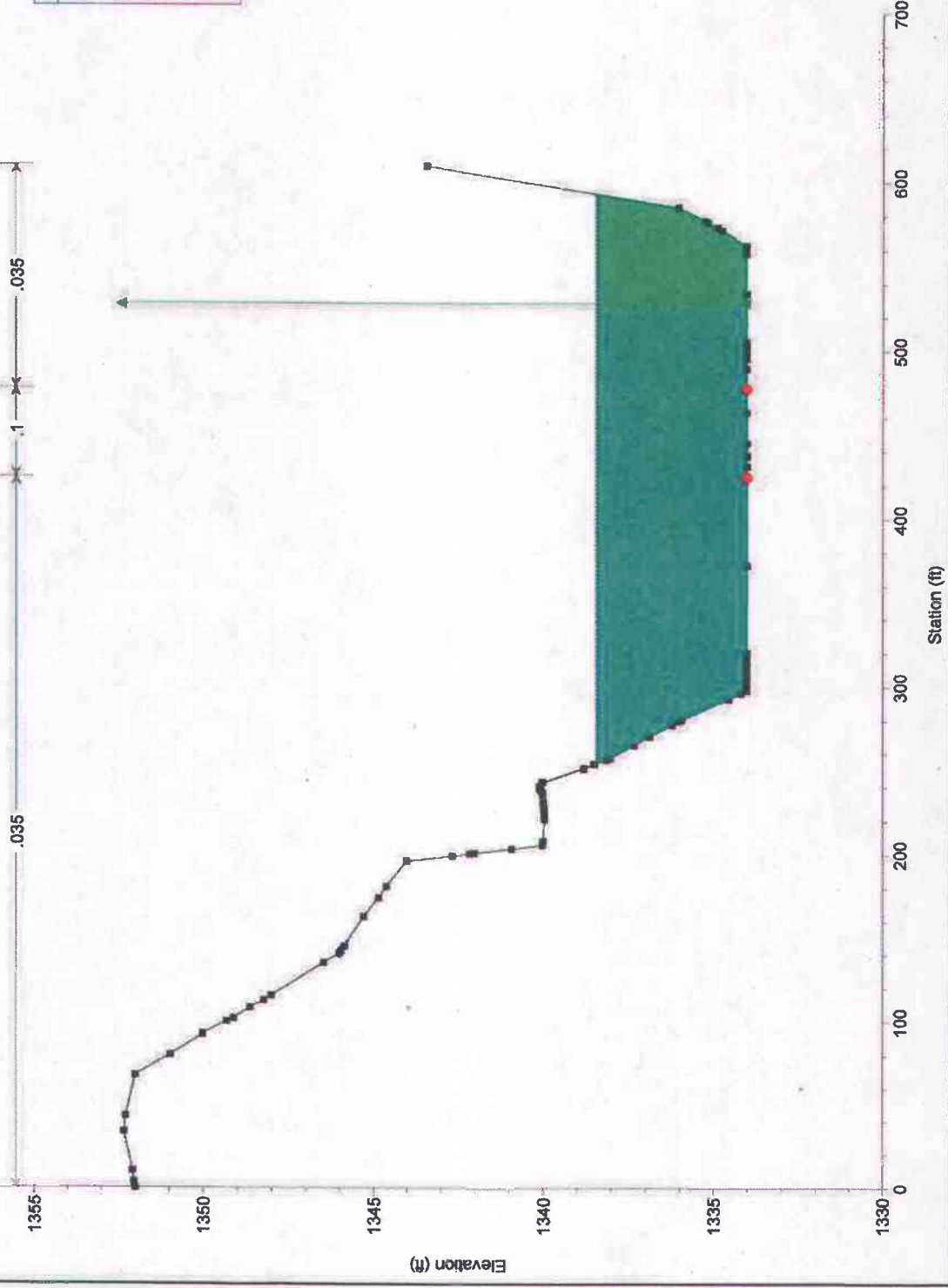
River = Existing Stream Reach = Existing\_Stream RS = 1988.25





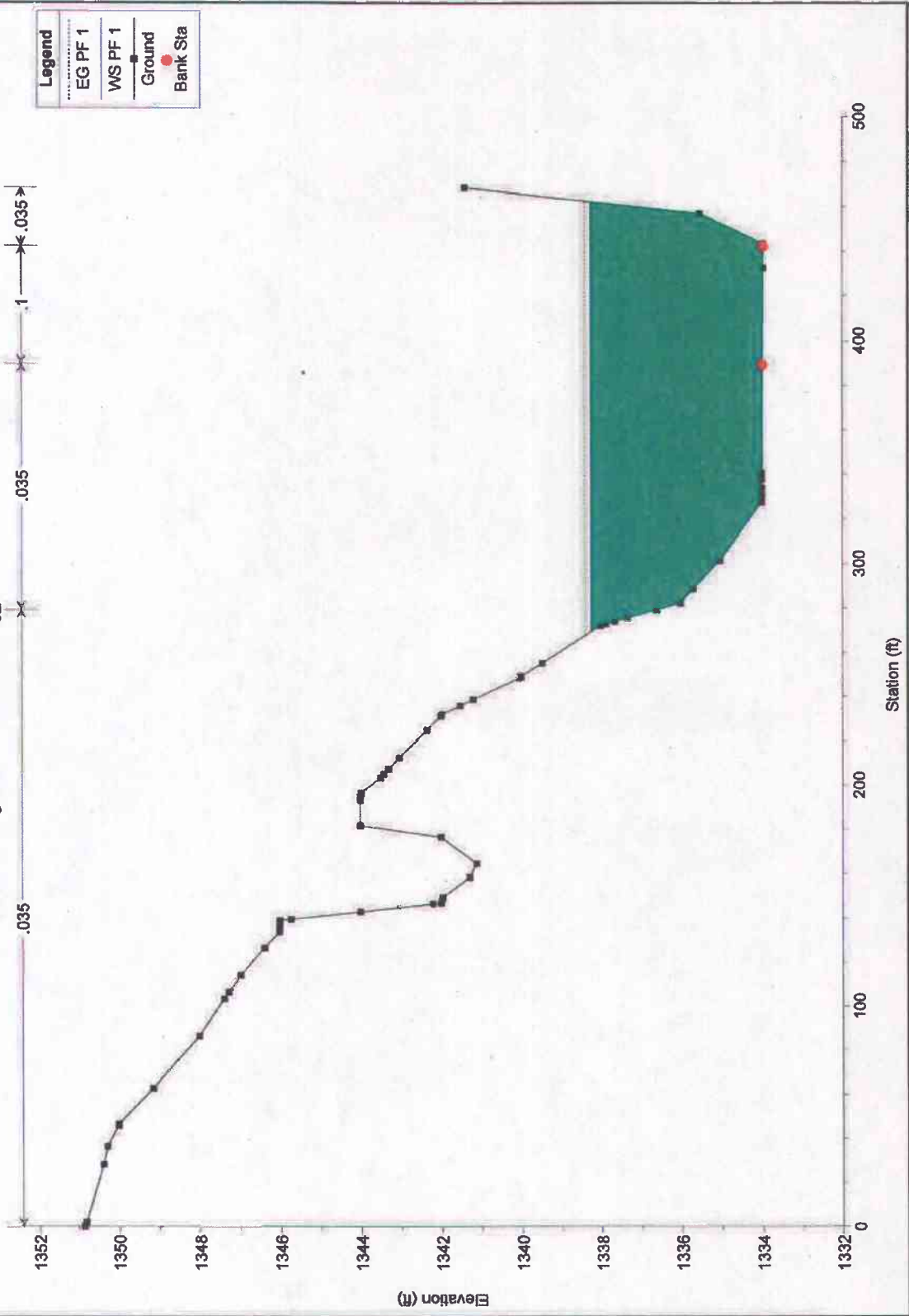
POST-PROJECT CONDITION - Q100 Plan: Plan 01 12/3/2017

River = Existing Stream Reach = Existing\_Stream RS = 1888.25



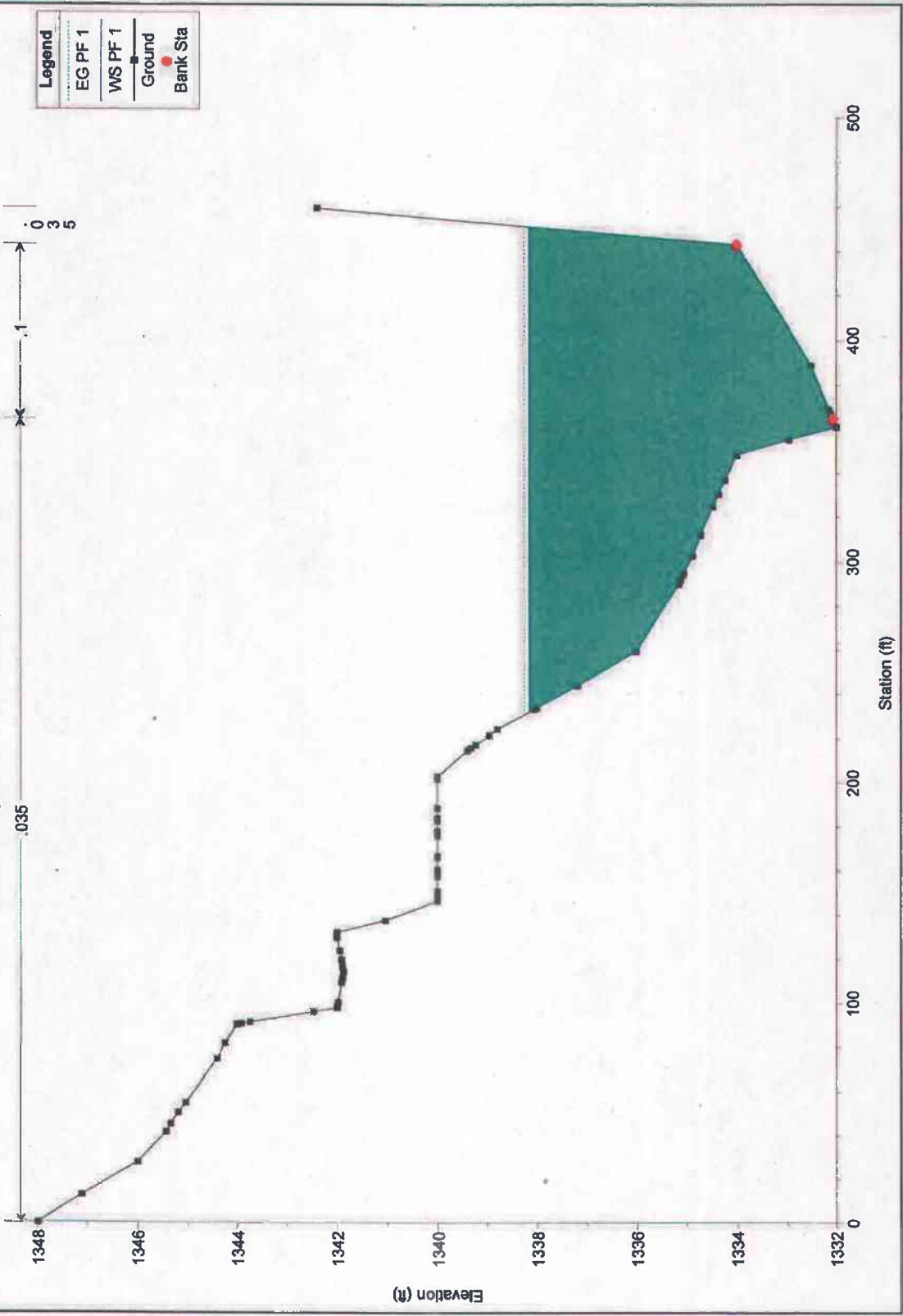
POST-PROJECT CONDITION - Q100 Plan: Plan 01 12/3/2017

River = Existing Stream Reach = Existing\_Stream RS = 1788.25



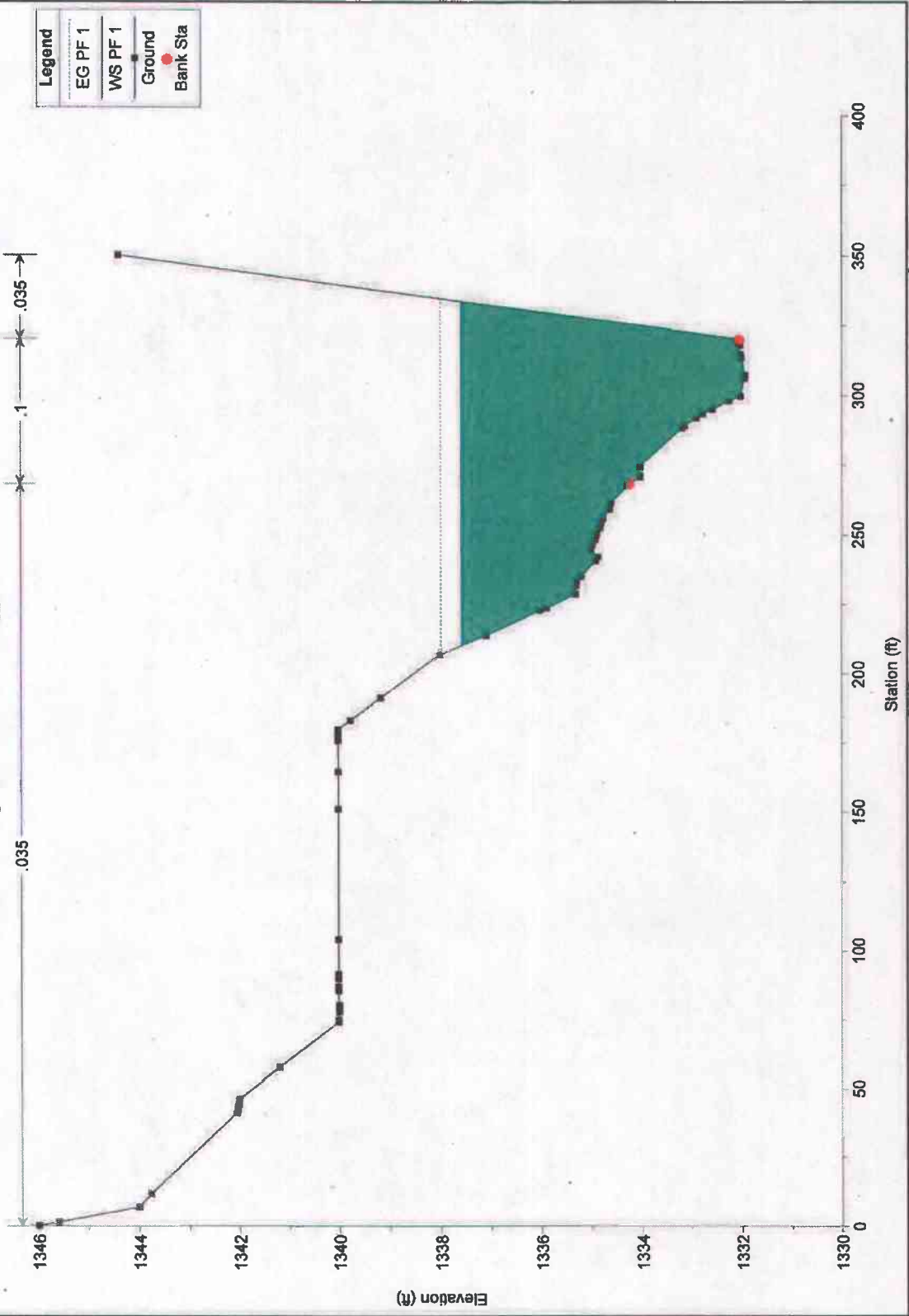
POST-PROJECT CONDITION - Q100 Plan: Plan 01 12/3/2017

River = Existing Stream Reach = Existing\_Stream RS = 1688.25



POST-PROJECT CONDITION - Q100 Plan: Plan 01 12/3/2017

River = Existing Stream Reach = Existing\_Stream RS = 1588.25

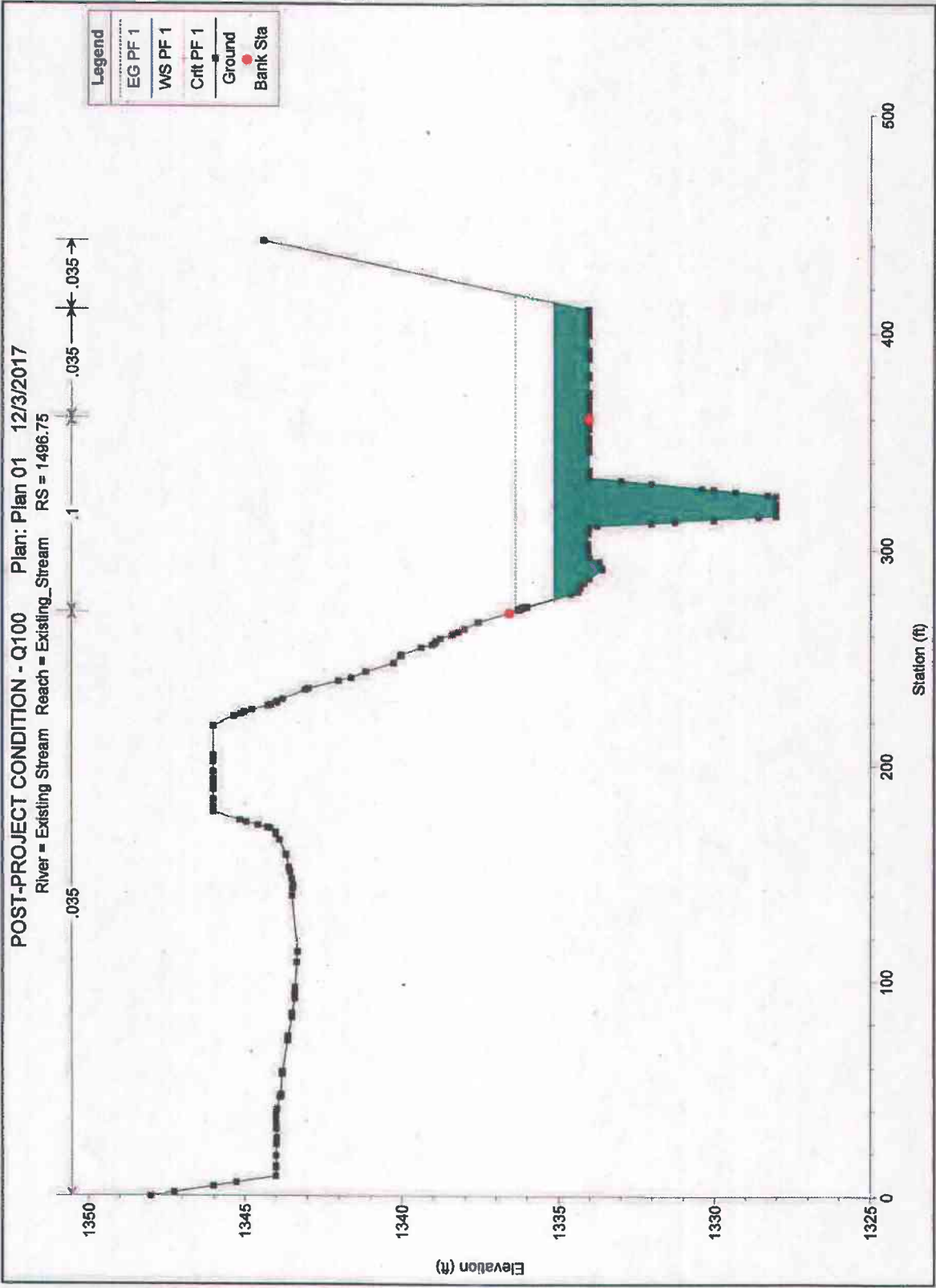


POST-PROJECT CONDITION - Q100 Plan: Plan 01 12/3/2017

River = Existing Stream Reach = Existing\_Stream RS = 1496.75

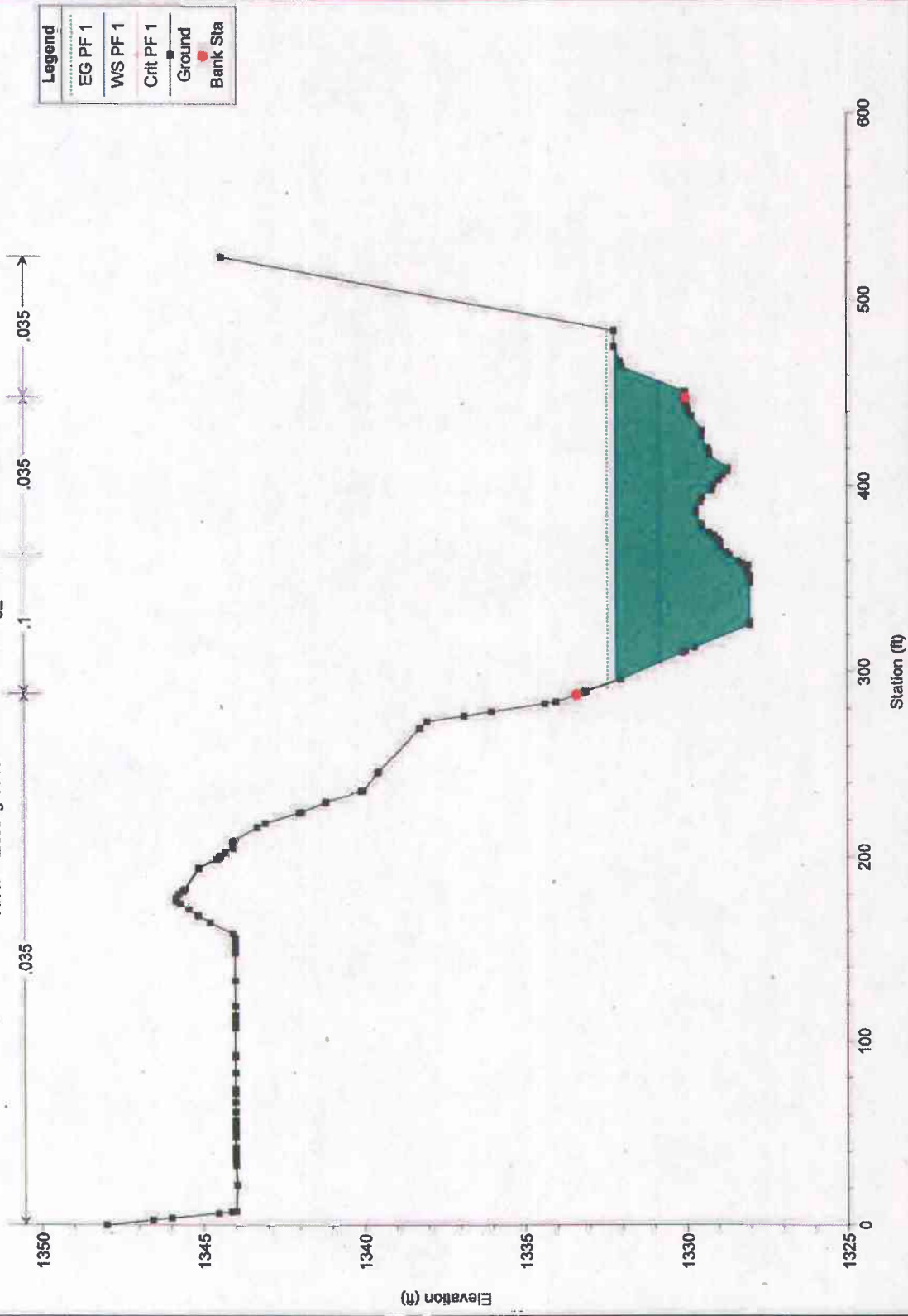


Legend	
EG PF 1	—
WS PF 1	—
Chl PF 1	—
Ground	—
Bank Sta	●



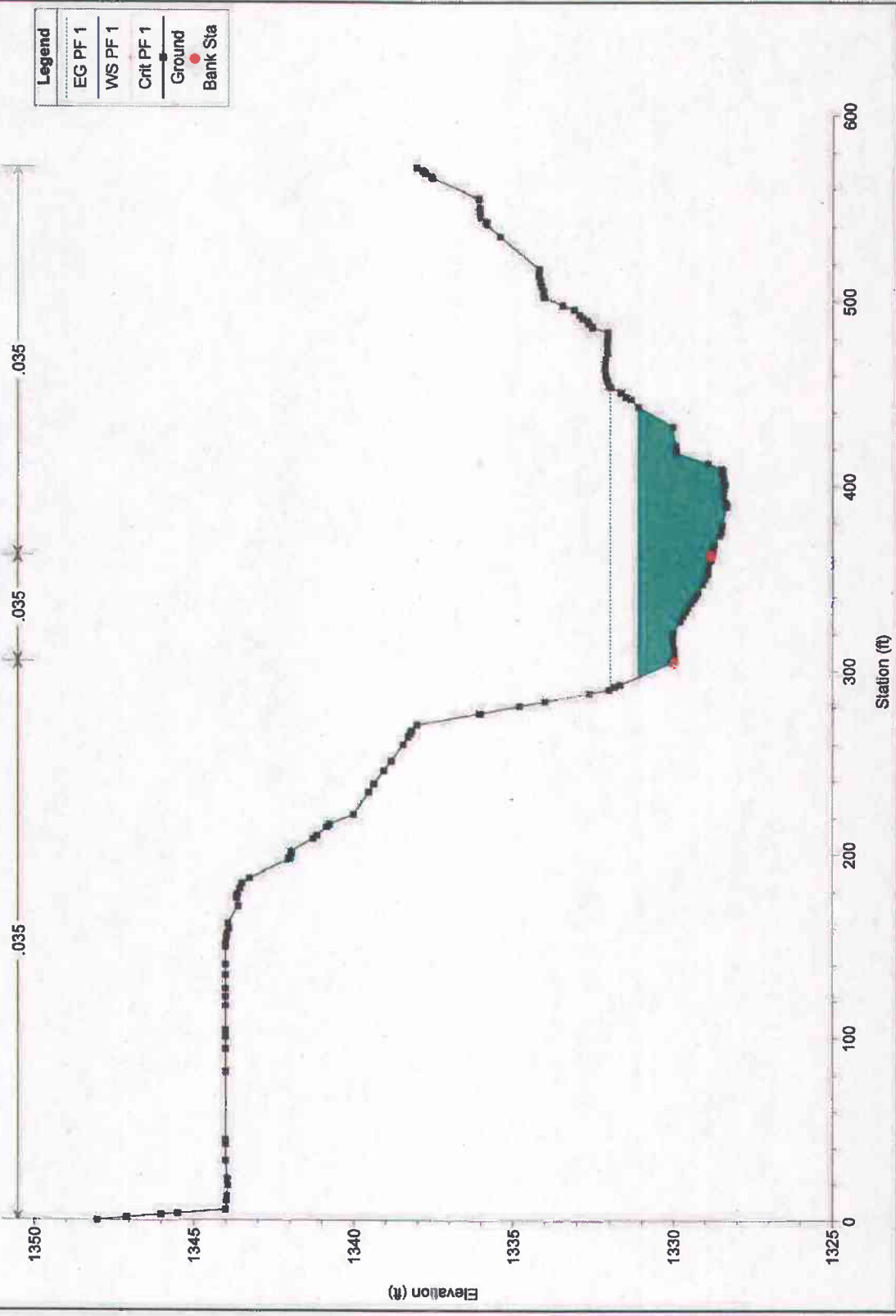
POST-PROJECT CONDITION - Q100 Plan: Plan 01 12/3/2017

River = Existing Stream Reach = Existing\_Stream RS = 1420.94



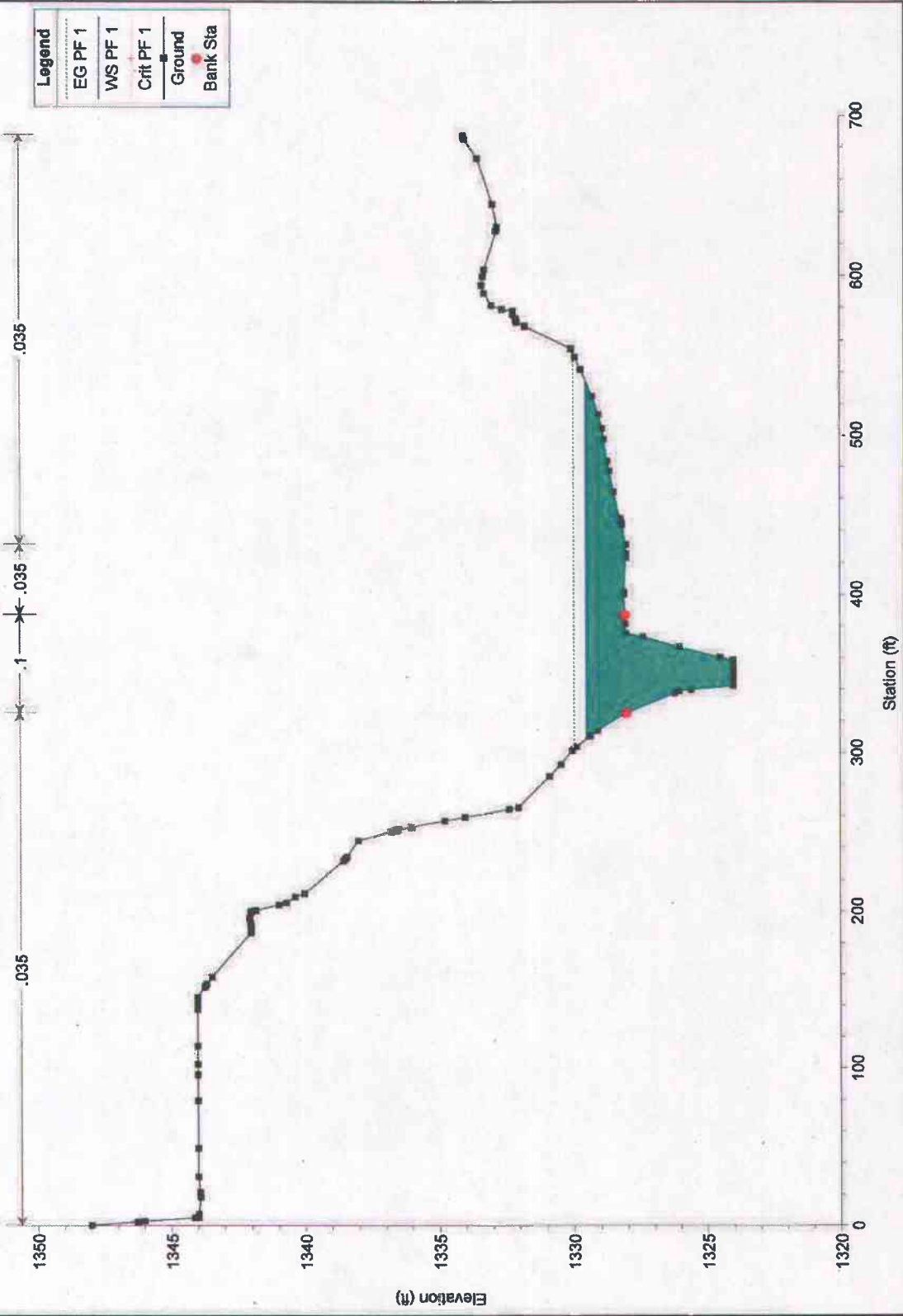
POST-PROJECT CONDITION - Q100 Plan: Plan 01 12/3/2017

River = Existing Stream Reach = Existing\_Stream RS = 1377.66



POST-PROJECT CONDITION - Q100 Plan: Plan 01 12/3/2017

River = Existing Stream Reach = Existing\_Stream RS = 1300







---

**Los Olivos (Tract 37294)**  
**FOCUSED TRAFFIC IMPACT ANALYSIS**  
**COUNTY OF RIVERSIDE**

**PREPARED BY:**

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**aevatt@urbanxroads.com**  
**(949) 660-1994 x204**

**Charlene So, PE**  
**cso@urbanxroads.com**  
**(949) 660-1994 x222**

**SEPTEMBER 19, 2018**

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## **LIST OF ABBREVIATED TERMS**

(1)	Reference
ADT	Average Daily Traffic
CA MUTCD	California Manual on Uniform Traffic Control Devices
Caltrans	California Department of Transportation
CEQA	California Environmental Quality Act
CMP	Congestion Management Program
DIF	Development Impact Fee
E+P	Existing Plus Project
EAP	Existing Plus Ambient Growth Plus Project
EAPC	Existing Plus Ambient Growth Plus Project Plus Cumulative
EVA	Emergency Vehicle Access
HCM	Highway Capacity Manual
ITE	Institute of Transportation Engineers
LOS	Level of Service
N/A	Not Applicable
PHF	Peak Hour Factor
Project	Los Olivos
RBBD	Road and Bridge Benefit District
RCIP	Riverside County Integrated Project
RTA	Riverside Transit Authority
RTP	Regional Transportation Plan
SCAG	Southern California Association of Governments
SCS	Sustainable Communities Strategy
TIA	Traffic Impact Analysis
TUMF	Transportation Uniform Mitigation Fee
WRCOG	Western Riverside Council of Governments

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