

**Appendix B:**  
**Notice of Preparation Comment Letters**

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# AIRPORT LAND USE COMMISSION RIVERSIDE COUNTY



May 9, 2019

Ms. Phayvanh Nanthavongdouangsy, Project Planner  
County of Riverside Planning Department  
4080 Lemon Street, 12<sup>th</sup> Floor  
Riverside CA 92502

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**RE: AIRPORT LAND USE COMMISSION (ALUC) DEVELOPMENT REVIEW REQUIRED**

Jurisdiction Project Case: GPA1205 Highway 74 Community Plan

Dear Ms. Nanthavongdouangsy:

Thank you for providing the Riverside County Airport Land Use Commission (ALUC) with a copy of the transmittal for the County of Riverside case; a proposal to establish the Highway 74 Community Plan, a proposed master plan for future development along a 6.8 mile corridor of Highway 74.

ALUC staff has determined that the project is located within Compatibility Zones E of March Air Reserve Base/Inland Port Airport Influence Area, and Zone E of Perris Valley Airport Influence Area, which does not restrict residential density and non-residential intensity, and also prohibits hazards to flights.

California Public Utilities Code section 21676 requires the local agency to refer any amendment of a general plan or specific plan, or the adoption or approval of a zoning ordinance or building regulation within an Airport Land Use Compatibility Plan (ALUCP) to the ALUC. Additionally, California Public Utilities Code Section 21676.5 allows the ALUC to review all projects within the Airport Influence Area when the local jurisdiction's General Plan is not consistent with the applicable ALUCP. Since the General Plan is not consistent with the ALUCP and/or because the project contemplates amendment of a general plan or specific plan, or the adoption or approval of a zoning ordinance or building regulation, the ALUC requests that you submit the above-identified project(s) for its review. ALUC staff is also available to assist in bringing your jurisdiction's General Plan into consistency with the applicable ALUCP, if the local jurisdiction so desires.

If you have any questions, please contact Paul Rull, ALUC Principal Planner, at (951) 955-6893.

Sincerely,

RIVERSIDE COUNTY AIRPORT LAND USE COMMISSION

Paul Rull, ALUC Principal Planner

County Administrative Center  
4080 Lemon St., 14th Floor.  
Riverside, CA 92501  
(951) 955-5132

[www.rcaluc.org](http://www.rcaluc.org)

STAFF

Director  
Simon Housman

John Guerin  
Paul Rull  
Barbara Santos



Kerri Tuttle <ktuttle@fcs-intl.com>

**Re: HWY 74 NOP comment letters/emails**

1 message

**Charles Holcombe** <cholcombe@fcs-intl.com> Fri, May 10, 2019 at 11:03 AM  
To: "Nanthavongdouangsy, Phayvanh" <PNANTHAV@rivco.org>  
Cc: Frank Coyle <fcoyle@cascinc.com>, Regine Osorio <rosorio@cascinc.com>  
Bcc: ktuttle@fcs-intl.com

Received. Thanks!

On Fri, May 10, 2019 at 9:16 AM Nanthavongdouangsy, Phayvanh <PNANTHAV@rivco.org> wrote:

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**From:** Rull, Paul  
**Sent:** Thursday, May 09, 2019 1:47 PM  
**To:** Nanthavongdouangsy, Phayvanh <PNANTHAV@RIVCO.ORG>  
**Subject:** RE: GPA1205 transmittal ALUC comments

For clarification, it will be an application to submit to ALUC for review and determination.

If you have any questions, please feel free to contact me.

**Paul Rull**  
ALUC Principal Planner



**Riverside County Airport Land Use Commission**  
4080 Lemon Street, 14<sup>th</sup> Floor  
Riverside, Ca 92501  
(951) 955-6893  
(951) 955-5177 (fax)  
[PRULL@RIVCO.ORG](mailto:PRULL@RIVCO.ORG)  
[www.rcaluc.org](http://www.rcaluc.org)

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**From:** Nanthavongdouangsy, Phayvanh  
**Sent:** Thursday, May 9, 2019 1:44 PM  
**To:** Rull, Paul <PRull@RIVCO.ORG>  
**Subject:** Re: GPA1205 transmittal ALUC comments

Thank you Paul

We will route the Project to ALUC for review.

Please let me know if you have any questions.

Best regards  
Phayvanh

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**From:** Rull, Paul  
**Sent:** Thursday, May 9, 2019 1:13:00 PM  
**To:** Nanthavongdouangsy, Phayvanh  
**Subject:** GPA1205 transmittal ALUC comments

Hi Phayvanh,

Thank you for transmitting the above reference project to ALUC for review. Please find attached my comments. Please note that the project is located within Zones E of both March Air Reserve Base/Inland Port Airport and Perris Valley Airport Influence Areas, and requires ALUC review as the proposed project includes a General Plan Amendment. As a note, Zone E for both airports does not restrict residential density and non-residential intensity.

If you have any questions, please feel free to contact me.

**Paul Rull**

ALUC Principal Planner



**Riverside County Airport Land Use Commission**  
4080 Lemon Street, 14<sup>th</sup> Floor  
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(951) 955-6893  
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**County of Riverside California**

--

Charles Holcombe  
**Senior Project Manager**

**Office** + 909-884-2255

**FirstCarbon Solutions (FCS)**  
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June 5, 2019

Phayvanh Nanthavongdouangsy  
Riverside County Planning Department  
P.O. Box 1409  
4080 Lemon Street, 12<sup>th</sup> Floor  
Riverside, CA 92501

RE: Highway 74 Community Plan  
EIR Scoping Meeting Comments  
City of Lake Elsinore

Dear Phayvanh:

It was very nice to meet you and the Riverside County Planning staff at the EIR Scoping meeting on May 16, 2019. The Highway 74 Community Plan is ambitious and the City of Lake Elsinore does not oppose the plan, hopes you are successful, and offers the following comments.

Mapping Area 1 is within the City of Lake Elsinore General Plan designated North Central Sphere between the City limits just north of Cambern Street traveling north on SR 74 to the North Peak area. The Highway 74 Community Plan land use designations are very similar to the City of Lake Elsinore land use designations except the Highway 74 Community Plan includes two commercial nodes that make sense and we do not oppose. The City of Lake Elsinore hopes that the Highway 74 Community Plan will lead to higher quality land uses and development standards than the existing businesses and area conditions (i.e. contractor yards, self-storage facilities, little paved parking, no landscaping, and inadequate screening/fencing).

Mapping Area 2 is outside the City limits but adjacent to the North Peak area and Rosetta Canyon residential subdivisions. We trust potential impacts to these areas will be analyzed and potential impacts mitigated to levels of insignificance.

A primary concern of the City is traffic. The 6.8 miles and 2,220 acres of intensified land uses in the Community Plan will undoubtedly lead to significant cumulative traffic impacts. We are very interested in reviewing the Traffic Impact Analysis and understand you have retained Urban Crossroads. The City believes that in order to adequately address traffic impacts the County with its partners needs to move forward with the El Toro Ethanac Expressway. We stand ready to join you in this endeavor.

The City's Engineering Division has expressed concerns pertaining to drainage, water lines, sewer lines and roadway right of way and offers the following comments:

951.674.0124

130 S. MAIN STREET

LAKE ELSINORE, CA 92530

WWW.LAKE-ELSINORE.ORG

1) The City's master drainage plan should be reviewed in the environmental process. How the widened road drains to each watershed should be looked at to ensure there is enough downstream capacity.

2) The City's General Plan calls for 134' minimum right of way along the entire corridor classified as an Augmented Urban Arterial. The City supports the use of this standard at a minimum, for both the Ethanac Expressway and Highway 74.


3) Current NPDES standards for new roadways should be followed.

4) Require future development to dedicate right of way to the City's General Plan roadway classification at a minimum.

The City of Lake Elsinore wishes you well on this project and respectfully requests that we be included on your notification list for all meetings and hearings, especially the Planning Commission and Board of Supervisors public hearings. In addition, we are very interested and look forward to reviewing the Draft EIR and applicable technical studies when available. We would appreciate a hard copy of the Draft EIR and a disk of the Draft EIR and technical studies.

Thank you for your consideration and if you have any questions or concerns please call me at 951-674-3124, Ext. 270 or email at [gtaylor@lake-elsinore.org](mailto:gtaylor@lake-elsinore.org).

Respectfully,



Grant Taylor,  
Community Development Director

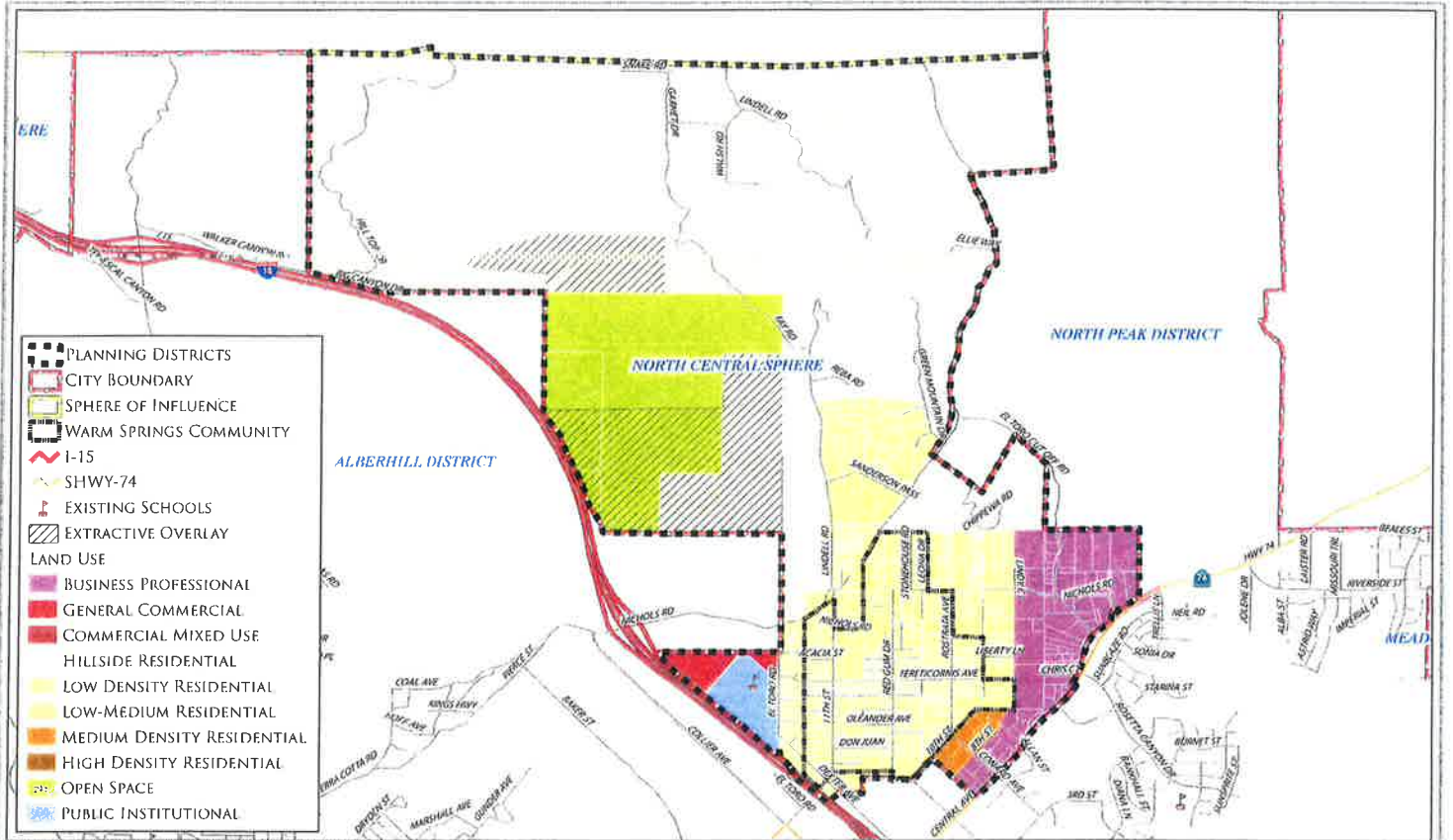
cc: Grant Yates, City Manager  
Honorable Mayor and City Council Members  
Jason Simpson, Assistant City Manager  
Justin Kirk, Assistant Community Development Director  
Remon Habib, City Engineer  
Charissa Leach, Assistant TLMA Director

Attachments:

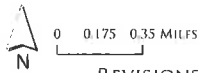
City of Lake Elsinore General Plan – North Central Sphere  
Scoping Meeting Notice and Project Description  
Highway 74 Community Plan Maps



# City of Lake Elsinore General Plan North Central Sphere Mapping Area 1



SOURCES: CITY OF LAKE ELSINORE, COUNTY OF RIVERSIDE



CITY OF LAKE ELSINORE  
NORTH CENTRAL SPHERE LAND USE PLAN  
FIGURE NCS-1

REVISIONS ADOPTED BY THE CITY COUNCIL ON APRIL 23, 2013 & AUGUST 27, 2013



RIVERSIDE COUNTY  
PLANNING DEPARTMENT

Charissa Leach, P.E.  
Assistant TLMA Director

# RIVERSIDE COUNTY PLANNING DEPARTMENT

**DATE: MAY 3, 2019**

**TO: INTERESTED AGENCIES, ORGANIZATIONS, RESIDENTS, AND PROPERTY OWNERS**

**SUBJECT: NOTICE OF PREPARATION OF A DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT (EIR) AND NOTICE OF EIR SCOPING MEETING FOR THE HIGHWAY 74 COMMUNITY PLAN (GENERAL PLAN AMENDMENT NO. 1205 AND ZONE CONSISTENCY PROGRAM)**

**Lead Agency:** County of Riverside  
**Street Address:** 4080 Lemon Street 12<sup>th</sup> Floor  
**City/State/Zip:** Riverside, CA 92501

**Contact:** Phayvanh Nanthavongdouangsy  
**Phone:** (951) 955-6573  
**Email:** PNANTHAV@RIVCO.ORG

This notice is hereby given that the County of Riverside, as the Lead Agency, has prepared a Notice of Preparation (NOP) for a program-level environmental impact report (EIR) for the Highway 74 Community Plan. A brief project description is provided below. The NOP and additional information regarding the proposed project is available at the Riverside County Planning Department located at 4080 Lemon St., 12<sup>th</sup> Floor, Riverside CA 92501 and online at <http://planning.rctlma.org/Advanced-Planning/Highway-74-Community-Plan>. The California Environmental Quality Act (CEQA) does not require the preparation of an Initial Study where the Lead Agency has determined that an EIR is clearly required for the project (CEQA Guidelines §15060(d) and 15063(a)). Therefore, an Initial Study Checklist ( is  is not) attached.

**Project Title:** Highway 74 Community Plan (GPA No. 1205) and Zone Consistency Program  
**Project Applicant:** County of Riverside  
**Project Location:** Unincorporated Communities between City of Perris and Lake Elsinore along Highway 74, Riverside County

**Project Description:** The Highway 74 Community Plan (Project) consists of General Plan Amendment (GPA) No. 1205 and a Zone Consistency Program which is proposed to master plan future development along a 6.8-mile long corridor of Highway 74 between the cities of Lake Elsinore and Perris in western Riverside County. The Project boundary encompasses approximately 2,220 acres of unincorporated land and includes portions of the Goodhope, Meadowbrook and Warm Springs Communities. As proposed, the Highway 74 Community Plan would provide for the development of residential neighborhoods of varying densities, along with commercial retail, mixed use areas, light industrial, business park, public facilities, rural, open space, and recreation areas. GPA No. 1205 will involve amendments to the existing General Plan Rural Village Land Use Overlays, Policy Areas, Foundation Components, land use designations, policies, trails, and road classifications. The Project will also include a Zone Consistency Program that will recommend parcel specific zone classifications that are consistent with the proposed land use designations.

**Scoping Meeting Information:** The Riverside County Planning Department will conduct a public scoping meeting in order to present the Project information and the CEQA process, as well as to receive public comments and suggestions regarding the scope and content of the EIR. A Scoping Meeting is scheduled for May 16, 2019 at the Moses-Schaffer Community Center located 21565 Steele Peak Drive, Perris CA 92570 from 6 P.M.– 8 P.M.

**Public Comments:** The NOP review period starts May 9, 2019 and ends June 10, 2019. The Riverside County Planning Department requests your careful review and considering of this notice, and invites written comments from interested agencies, persons, and organizations regarding the preparation of the EIR. Due to the time limits mandated by State law, your comments must be sent to the Riverside County Planning Department by the close of business, 5:00 P.M., on June 10, 2019. Please include a contact person at your agency or organization. You may also provide oral or written comments in person at the Scoping Meeting noted above. Please send your comments to Phayvanh Nanthavongdouangsy at the address provided above.

**Date:** 5/3/2019

**Signature:**

**Title:**

Phayvanh Nanthavongdouangsy  
Planner

## **I. PROJECT INFORMATION PACKET INTRODUCTION**

Pursuant to Section 15051 of the CEQA Guidelines, the County of Riverside is the Lead Agency for this Draft Programmatic Environmental Impact Report (EIR). The proposed Highway 74 Community Plan (Project) encompasses a 6.8-mile long corridor of Highway 74 located between the Cities of Lake Elsinore and Perris, in western Riverside County, California. The Project includes General Plan Amendment (GPA) No. 1205 and a Zone Consistency Program.

The focus and intent of this Programmatic Environmental Impact Report (EIR) is to ensure consideration of cumulatively significant, and possibly unavoidable impacts that might be mitigated on a case-by-case basis and to allow the County to consider broad policy alternatives and program wide mitigation measures at an early time when the agency has great flexibility to deal with basic problems or cumulative impacts. [Section 15168(b)(2)(3)]

In addition to the broad spectrum of land use and policy changes, proposed as part of the Highway 74 Community Plan, the County will prepare the program-level technical studies necessary to support the GPA and Zone Consistency Program. As such, the County is implementing consideration of the cumulative impacts, associated with the Project, as well as the implementing and subsequent projects resulting from the GPA and Zone Consistency Program, to the degree feasible and required by CEQA; however, the CEQA guidance (for an EIR) does not require an exhaustive consideration of all later activities that can be contemplated as part of the broad level policy document. [Section 15168(c)(1)].

## **II. REGIONAL LOCATION**

The Project is located on a 6.8-mile long section of Highway 74 between Interstates 15 and 215 (I-15, and I-215), between the Cities of Lake Elsinore and Perris, in western Riverside County, as illustrated in Exhibit 1: Project Location Map. The proposed Highway 74 Community Plan encompasses approximately 2,220 acres of unincorporated lands. Portions of the unincorporated communities of Goodhope, Meadowbrook and Warm Springs are within the Project boundary.

## **III. HIGHWAY 74 COMMUNITY PLAN PROJECT DESCRIPTION**

The Project includes GPA No. 1205 and a Zone Consistency Program to create a vibrant and economically successful corridor that will facilitate attractive and well-planned communities while preserving the rural nature of the community. GPA No. 1205 proposes to modify the existing General Plan Land Use Designations, Rural Village Land Use Overlays, Policy Areas, road classifications, and policies to progress opportunities for residential, commercial, public facility, mixed-use areas, light industrial, and business park developments. The Zone Consistency Program will recommend parcel specific zone classifications that are consistent with the proposed GPA. The Project area is partially located within the Mead Valley Area Plan (MVAP) and Elsinore Area Plan (ELAP) as illustrated in Exhibit 2: Existing General Plan Land Use Designation, Overlays and Policy Areas.

GPA No. 1205 will alter the existing Rural Village Land Use Overlays, Policy Areas, the General Plan Foundations, primarily from the Rural and Rural Community Foundations to Community Development, and Land Use Designations in support of the proposed Community Plan. The GPA is also anticipated to amend the road and trail classifications to support the proposed land use plan and policy amendments. The GPA and Zone Consistency Program is a "Project", as defined by CEQA and as such is subject to environmental review by the County of Riverside, acting in the capacity of the Lead Agency for the Highway 74 Community Plan. Due to the large scope of the Project, and likelihood of implementing and subsequent Projects, the County is contemplating the development of a Programmatic Environmental Impact Report (EIR) pursuant to Section 15168 of the CEQA Guidelines, which states as follows, "A program EIR is an EIR which may be prepared on a series of actions that can be characterized as one large project and are related geographically and are a logical part in the chain of contemplated actions [Section 15168(a)(1)(2)].

**Planning Concept**

The proposed Project consists of a Community Plan that would master plan a 6.8-mile-long section of Highway 74 as a residential, commercial retail, public facility, mixed-use, light industrial, business park, rural, and recreational corridor. The preliminary land use concept, provided in Exhibit 3: Proposed Land Use and Highway 74 Community Plan Policy Area, illustrates the type and range of uses proposed. For reference purposes, Exhibit 3 is divided into six map-areas to ease the reader’s view of the proposed Highway 74 Policy Area and the associated Land Use Designation changes. The Plan is characterized by a mix of proposed uses that will promote economic development along this segment of Highway 74. The Plan values the General Plan criteria of clustered development in order to create appropriate built environments that promote economic growth. A summary of the type and amount of proposed land uses, as illustrated in the concept plan, is provided in Table 1.

**Existing land Use**

The Project area is relatively rural between the rapidly developing cities of Lake Elsinore and Perris. There are existing single family residential neighborhoods scattered throughout the corridor surrounded by low hilly terrain and large boulders. The Project area has existing local businesses such as auto/tire repair shops, nursery, landscape and fencing supply, trailer supply, home businesses, towing services, truck repair/rental, neighborhood markets, storage facilities, and warehouses. The project area also has churches and a Caltrans maintenance facility.

**Existing General Plan Land Use Designations, Overlays and Policy Areas**

The current General Plan Land Use Designations within the Project Area are summarized in Table 1: Summary of Existing and Proposed General Plan Land Use Designations. Approximately 933 acres of the Project area are within a General Plan Rural Village Land Use Overlay (RVLUO) for the communities of Goodhope and Meadowbrook. The overlays provide alternative land use designations that supports developments pursuant to the CR, LI, MDR, and MHDR Land Use Designations. The Project proposes to replace the RVLUO with a land use plan and polices created through extensive community input. Table 1 provides summary of the Land Use Designations with the RVLUO alternative Land use designations. Approximately 184 acres of the Project area are within the Highway 74 Perris and Good Hope Policy Areas that allows the relocation of businesses that needed to be relocated due to the expansion of Highway 74. The Highway 74 Policy Areas will be removed as part of this Project.

Approximately 192 acres of the Project area is within the Warms Springs Policy Area. The existing policies protects the visual and biological assets of the Warm Springs Area. There are no proposed changes to Warm Springs Policy Area.

**Table 1: Summary of Existing and Proposed General Plan Land Use Designations**

Land Use Designations (acres)	Existing Land Use	Existing Land Use Modified by RVLUO	Proposed Land Use
<b>COMMUNITY DEVELOPMENT FOUNDATION COMPONENT</b>			
Very Low Density Residential (VLDR)(1 acre min.)	704.32	250.54	849.67
Low Density Residential (LDR)(0.5 acre min.)	0	0	121.71
Medium Density Residential (MDR)(2-5 du/acre)	111.04	380.38	51.50
Medium High Density Residential (MHDR)(5-8 du/acre)	29.01	172.39	29.01
High Density Residential (HDR) (14-20 du/acre)	0	0	5.05
Very High Density Residential (VHDR) (14-20 du/acre)	12.77	0	12.92
Highest Density Residential (HHDR) (20+ du/acre)	16.93	16.93	16.93
Commercial Retail (CR)(0.2-0.35 FAR)	14.19	265.17	149.37
Business Park (BP) (0.25-0.60 FAR)	33.79	33.79	191.06



Land Use Designations (acres)	Existing Land Use	Existing Land Use Modified by RVLUO	Proposed Land Use
Light Industrial (LI) (0.25-0.60 FAR)	112.53	311.62	158.31
Public Facilities (PF) (≤0.60 FAR)	0	0	20.15
Mixed-Use Area (MUA) (varying density and FAR)	202.47	112.98	446.93
Community Center (CC) (5-40 du/acre; 0.10-0.3 FAR)	6.71	0	6.71
<b>Community Development Foundation Component Total</b>	<b>1,243.76</b>	<b>1,543.80</b>	<b>2,059.32</b>
<b>RURAL FOUNDATION COMPONENT</b>			
Rural Residential (RR) (5 acre min.)	302.95	302.95	69.56
Rural Mountainous (RM) (10 acre min.)	102.23	57.64	46.89
<b>Rural Foundation Component Total</b>	<b>405.18</b>	<b>360.59</b>	<b>116.45</b>
<b>RURAL COMMUNITY FOUNDATION COMPONENT</b>			
Rural Community – Very Low Density Residential (RC-VLDR) (1 acre min.)	530.69	309.61	0
<b>Rural Community Foundation Component</b>	<b>530.69</b>	<b>309.61</b>	<b>0</b>
<b>OPEN SPACE FOUNDATION COMPONENT</b>			
Open Space – Recreation (OS-R)	30.76	0	29.01
Open Space – Conservation (OS-C)	0.00	0	14.67
Open Space – Conservation Habitat (OS-CH)	9.07	5.46	0
<b>Open-Space Foundation Component Total</b>	<b>39.83</b>	<b>5.46</b>	<b>43.68</b>
<b>Grand Total</b>	<b>2,219.46</b>	<b>2,219.46</b>	<b>2,219.46</b>

The Zone Consistency Program will recommend zone classification changes that are consistent with the proposed General Plan Land Use Designations. Table 2 provides a summary of the existing and proposed zone classifications.

**Table 2: Summary of Existing and Proposed Zone Classifications**

Zone Classifications (Acres)	Existing	Proposed
R-1 (One-Family Dwelling)	0	36.78
R-3 (General Residential)	0	3.14
R-7 (Highest Density Residential)	16.93	16.93
R-A (Residential Agricultural)	0.00	108.74
R-A-1 (Residential Agricultural (1 acre min.))	8.30	8.30
R-A-10 (Residential Agricultural (10 acre min.))	15.43	29.53
R-A-2 (Residential Agricultural (2 acre min.))	62.05	53.79
R-A-20000 (Residential Agricultural (20,000 square feet min.))	32.87	32.87
R-R (Rural Residential)	1,174.05	646.61
SP (Specific Plan)	125.09	125.09
W-1 (Watercourse, Watershed and Conservation Areas)	12.89	13.25
W-2-M-1 (Controlled Development Area with Mobilehomes)	165.12	98.92
MU (Mixed Use)	146.05	373.99
M-SC (Manufacturing - Service Commercial)	166.87	145.32
I-P (Industrial Park)	10.08	175.35
C-P-S (Scenic Highway Commercial)	31.84	113.76
C-1/C-P (General Commercial)	17.61	0.00
No Zone Classification	0.17	0.00
Road Right of Way	234.25	237.07
<b>TOTAL</b>	<b>2,219.46</b>	<b>2,219.46</b>

## **TRANSPORTATION AND CIRCULATION**

### ***Transportation***

The circulation system will consist of a variety of road types ensuring efficient and connected circulation throughout the planning areas. The Highway 74 Community Plan will require that commercial, light industrial and mixed-use developments not substantially impact circulation systems and incorporate access to Highway 74 consistent with County Transportation policies and requirements, consistent with the Elsinore Area Plan policy ELAP 1.4. The Riverside County Transportation Department is currently conducting studies for the Ethanac Expressway Project. The proposed Ethanac Expressway project will expand Highway 74 through the City of Perris and will include the Community Plan area. This expansion will result in six-lanes of traffic at full build out targeted for 2041.

### ***Circulation***

In compliance with the Elsinore Area Plan, The Highway 74 Community Plan will ensure that the design and development of the vehicular roadway system is in accordance with the classifications and design standards specified in the Planned Circulation Systems section of the General Plan Circulation Element of the Elsinore Area Plan as well as the Mead Valley Area Plan (policies ELAP 8.1, MVAP 9.1). Maintain roadway Level of Service (LOS) standards as described in the Level of Service section of the County General Plan Circulation Element (policies ELAP 8.2, MVAP 9.2).

## **IV. RELATIONSHIP TO OTHER PLANS AND PROGRAM**

As mentioned above, Riverside County Transportation Department is currently evaluating the Ethanac Expressway Project. The Ethanac Expressway Project will connect the Cities of Hemet, San Jacinto, Menifee, Perris and Lake Elsinore and the unincorporated communities of Winchester, Homeland, Romoland, Good Hope, Meadowbrook and Warm Springs. The result of the corridor vision may include recommendation for number of lanes, intersection spacing, bicycle lands and routes, bus stops, future public transit stops, pedestrian uses, and multi-trail uses.

## **V. PROJECT APPROVALS**

### **LEAD AND OTHER AGENCIES**

- County of Riverside (Lead Agency)

In addition to the County of Riverside, the proposed Project may require review and approval by other agencies; state and local public agencies that may have responsibility to carry out or approve aspects of the project are considered Responsible Agencies under CEQA §21069. These agencies include but are not limited to:

- Army Corps of Engineers for Sections 401, and 404 activities under the Clean Water Act;
- California Department of Fish and Game for stream bed alteration agreement pursuant to Section 1603 of the California Fish and Game Code;
- California Department of Transportation (Caltrans) for activities related to improvements to state highways;
- United States Fish and Wildlife Service (USFWS)
- Riverside County Flood Control and Water Conservation District (RCFC&WCD)
- California Department of Water Resources
- State Water Quality Control Board (Santa Ana Region)
- Western Riverside County Conservation Authority (RCA)
- South Coast Air Quality Control Board

## Entitlements

The Highway 74 Community Plan entitlements will include:

- General Plan Amendment (GPA);
- Consistency Change of Zone;
- Environmental Impact Report (EIR);
- MSHCP Compliance Determination;

## VI. POTENTIAL ENVIRONMENTAL EFFECTS

The County of Riverside has determined that a Programmatic Environmental Impact Report (EIR) will be prepared to address potential environmental impacts resulting from the proposed Project. As a result, the County will not prepare an Initial Study as permitted in Section 15060(d) of the State CEQA Guidelines. The EIR will analyze the potential effects of implementing the policies and programs proposed by the Project based on the mandatory impact categories specified in the CEQA environmental checklist (State CEQA Guidelines Appendix G). The proposed project does not include a request for development, nor does it include any development-specific entitlements. Any such proposal would be subject to its own project-specific CFQA analysis at a future date.

The EIR will address the potential short- and long-term effects of the changes on the environment associated with the increase in future development potential that results from the proposed Project. The EIR will also evaluate potential for the Project to cause direct and indirect growth-inducing impact, as well as cumulative impacts. Mitigation will be proposed for those impacts that are determined to be significant, and a mitigation monitoring program will be developed as required by State CEQA Guidelines Section 15150.

It is anticipated that the EIR will involve research, analysis, and study of the following environmental resources:

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

The EIR for this project will examine the above-listed topics both at a cumulative level for countywide impacts and for each of the Area Plan amendments individually. The EIR will also examine a reasonable range of alternatives to the project, including the CEQA mandated No Project Alternative and other potential alternatives that may be capable of reducing or avoiding potential environmental effects.

Because this is a program EIR, it will not provide project-level analysis. The analysis will rely on existing policies, standards, and conditions to address potential impacts associated with the project. Subsequent environmental analysis consistent with County procedures will be required before physical development can occur on any of the sites identified in the project.

**Contact Information:**

**Lead Agency**

County of Riverside

Planning Department

4080 Lemon Street 12<sup>th</sup> Floor

Riverside, CA 92502

Contact: Phayvanh Nanthavongdouangsy

Phone: 951-955-6573

[pnanthav@rivco.org](mailto:pnanthav@rivco.org)

**Civil Engineering/Consulting**

CASC Engineering & Consulting, Inc.

1470 E. Cooley Dr.

Colton, CA 92324

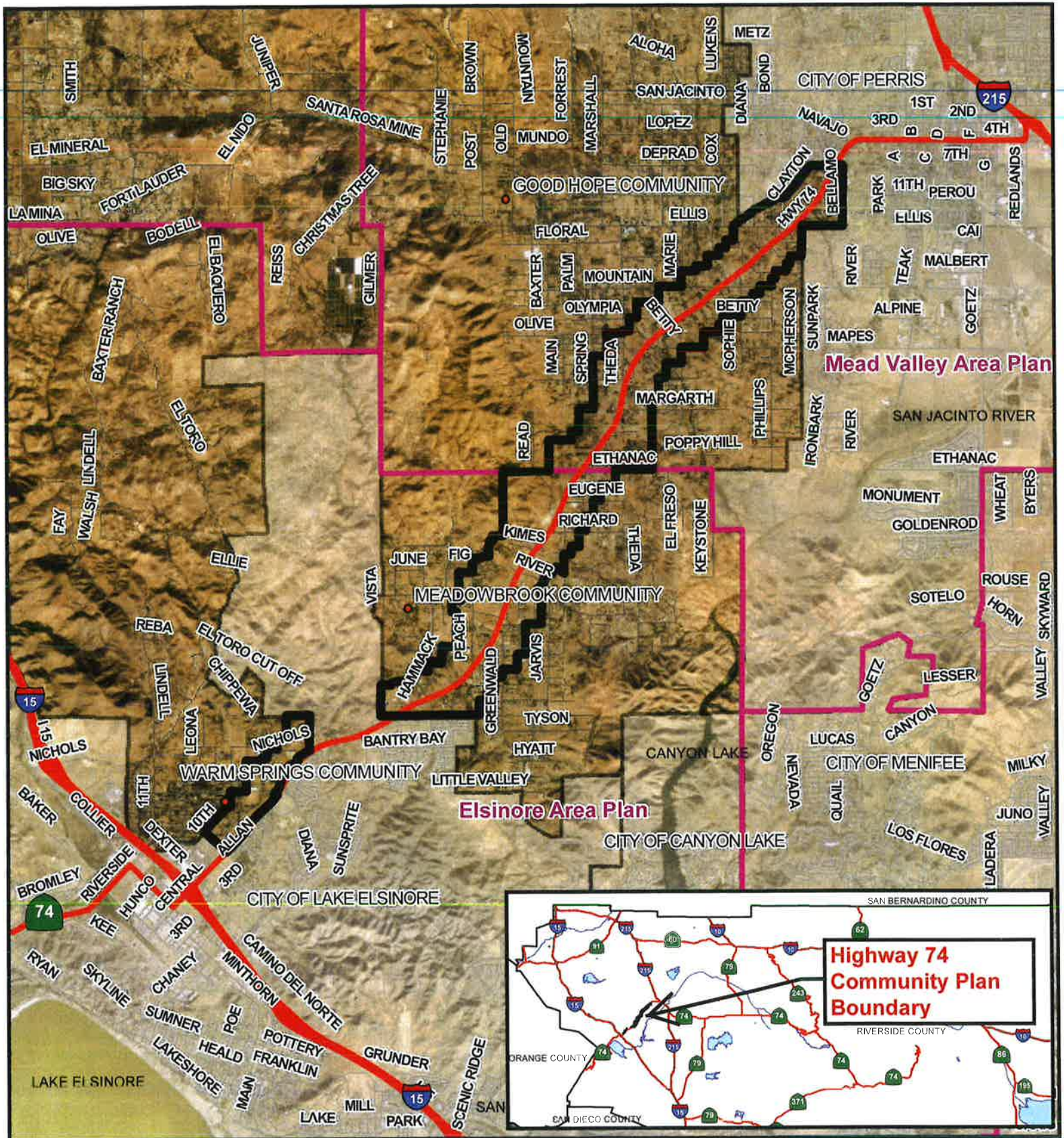
Contact: Frank Coyle

[fcoble@cascinc.com](mailto:fcoble@cascinc.com)







# EXHIBIT 1: PROJECT LOCATION

N



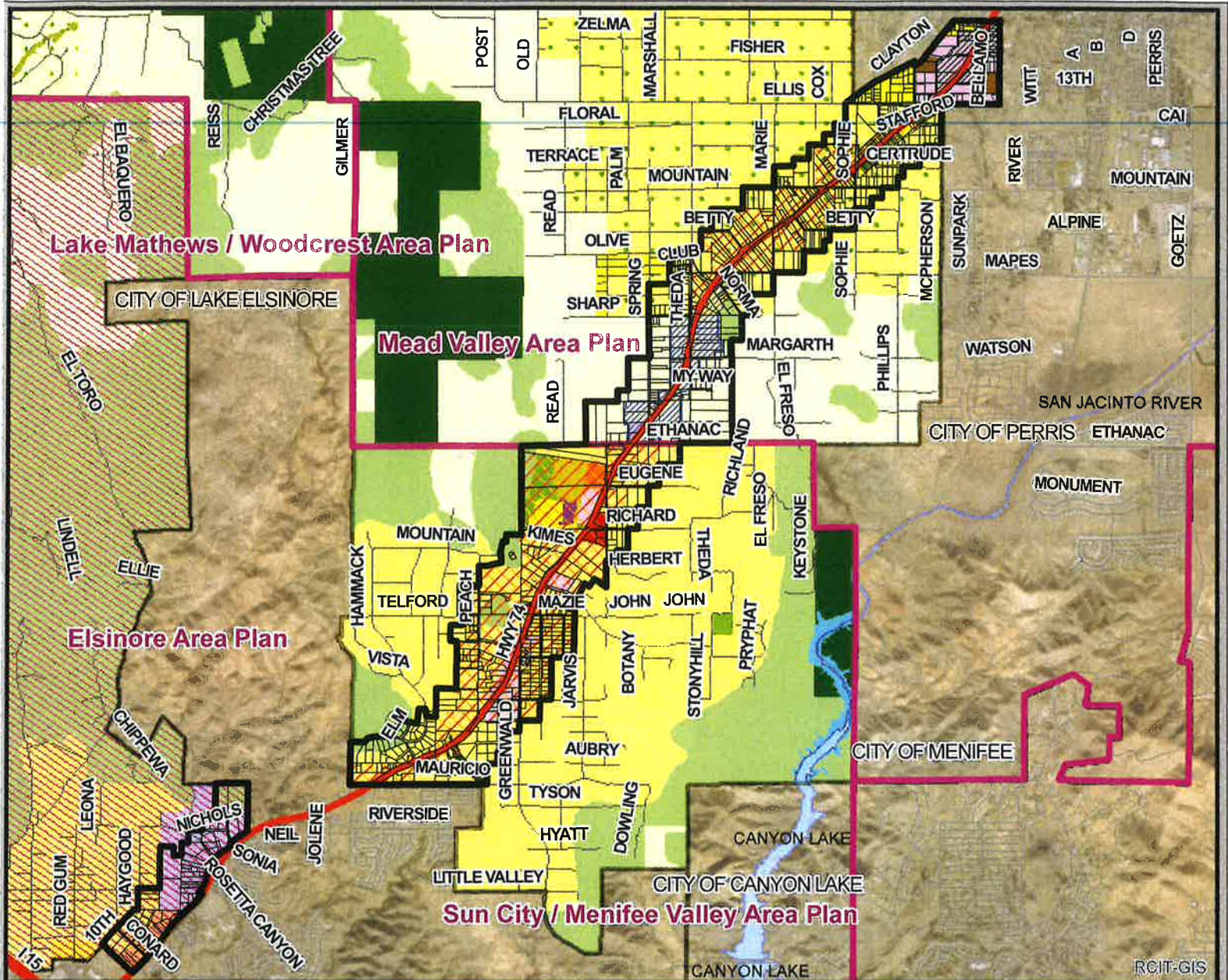
Date: 3/27/2019

-  PROJECT LIMITS: HIGHWAY 74 COMMUNITY PLAN BOUNDARY
-  GENERAL PLAN: AREA PLAN BOUNDARIES
-  CITIES
-  HIGHWAYS

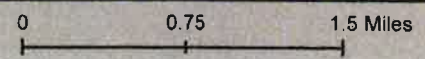




# EXHIBIT 2: EXISTING GENERAL PLAN LAND USE DESIGNATIONS, POLICY AREAS AND OVERLAYS



Date: 03/27/2019

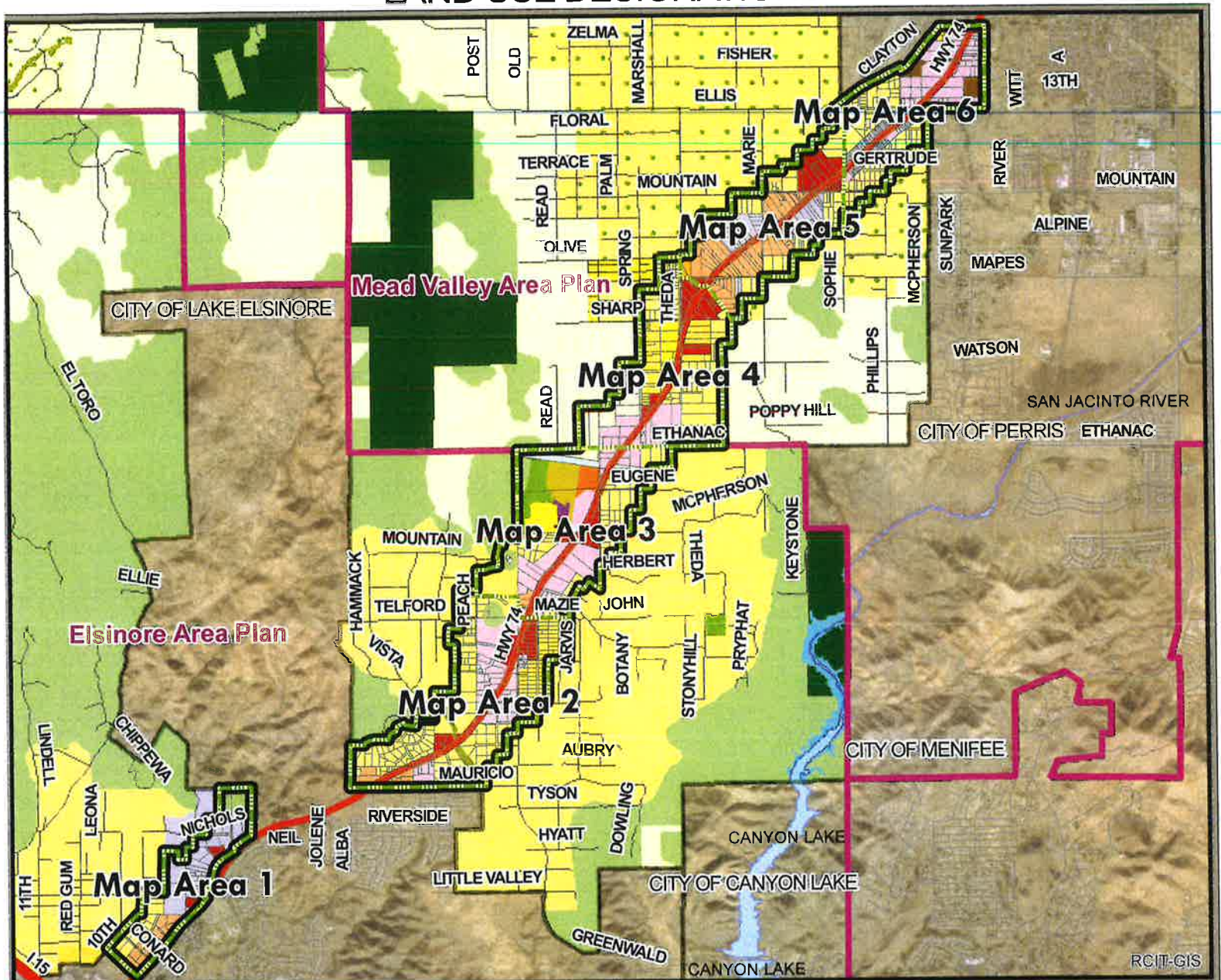


<p> HIGHWAYS</p> <p> GENERAL PLAN: AREA PLAN BOUNDARIES</p> <p> HIGHWAY 74 COMMUNITY PLAN BOUNDARY</p> <p><b>EXISTING POLICY</b></p> <p> HIGHWAY 74 GOOD HOPE POLICY AREA</p> <p> HIGHWAY 74 PERRIS POLICY AREA</p> <p> WARM SPRINGS POLICY AREA</p> <p><b>EXISTING OVERLAY</b></p> <p> RURAL VILLAGE LAND USE OVERLAY</p>	<p><b>GENERAL PLAN: LAND USE DESIGNATIONS</b></p> <p><b>RURAL COMMUNITY</b></p> <p> Rural Community - Very Low Density Residential</p> <p> Rural Community - Estate Density Residential</p> <p><b>RURAL</b></p> <p> Rural Residential</p> <p> Rural Mountainous</p>	<p><b>COMMUNITY DEVELOPMENT</b></p> <p> Very Low Density Residential</p> <p> Low Density Residential</p> <p> Medium Density Residential</p> <p> Medium High Density Residential</p> <p> Highest Density Residential</p> <p> Very High Density Residential</p>	<p> Commercial Retail</p> <p> Business Park</p> <p> Light Industrial</p> <p> Community Center</p> <p> Mixed-Use</p> <p><b>OPEN SPACE</b></p> <p> Water</p> <p> Open Space Rural</p> <p> Open Space Recreation</p> <p> Conservation Habitat</p> <p> Conservation</p>
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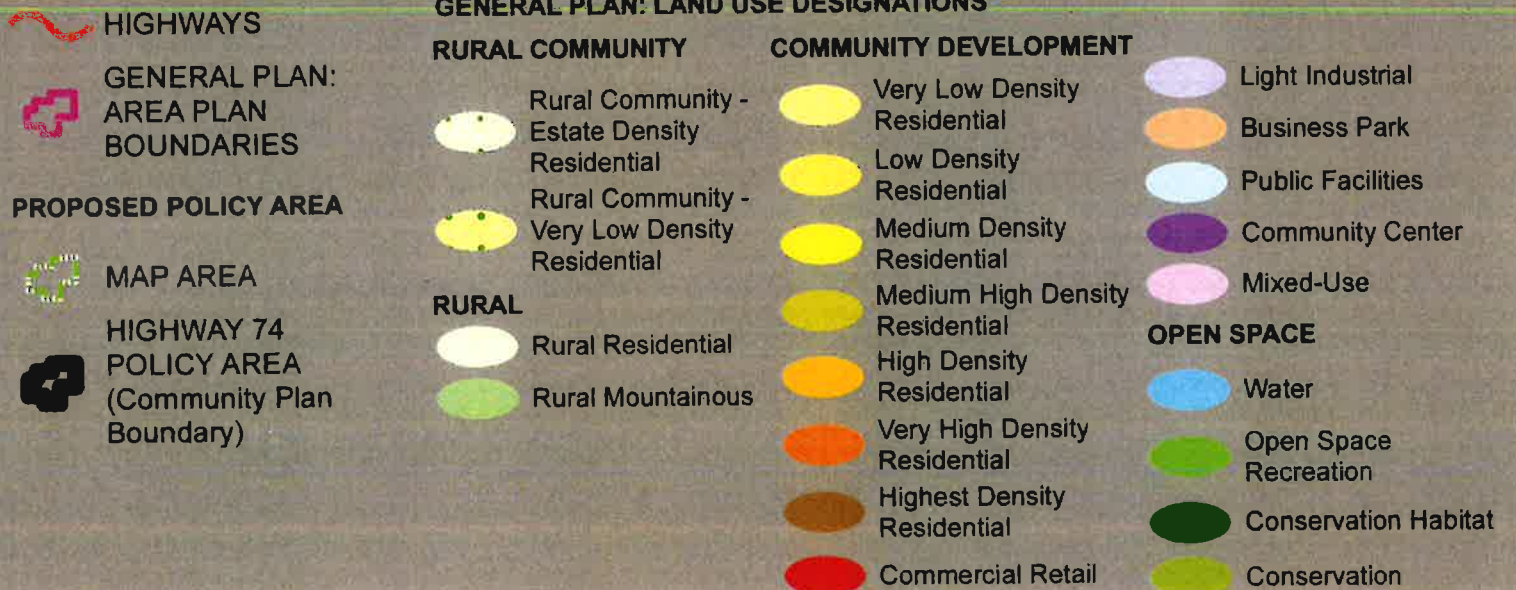
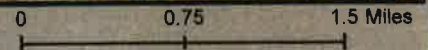
RCIT-GIS



# EXHIBIT 3: PROPOSED POLICY AREA AND LAND USE DESIGNATIONS



Date: 3/27/2019



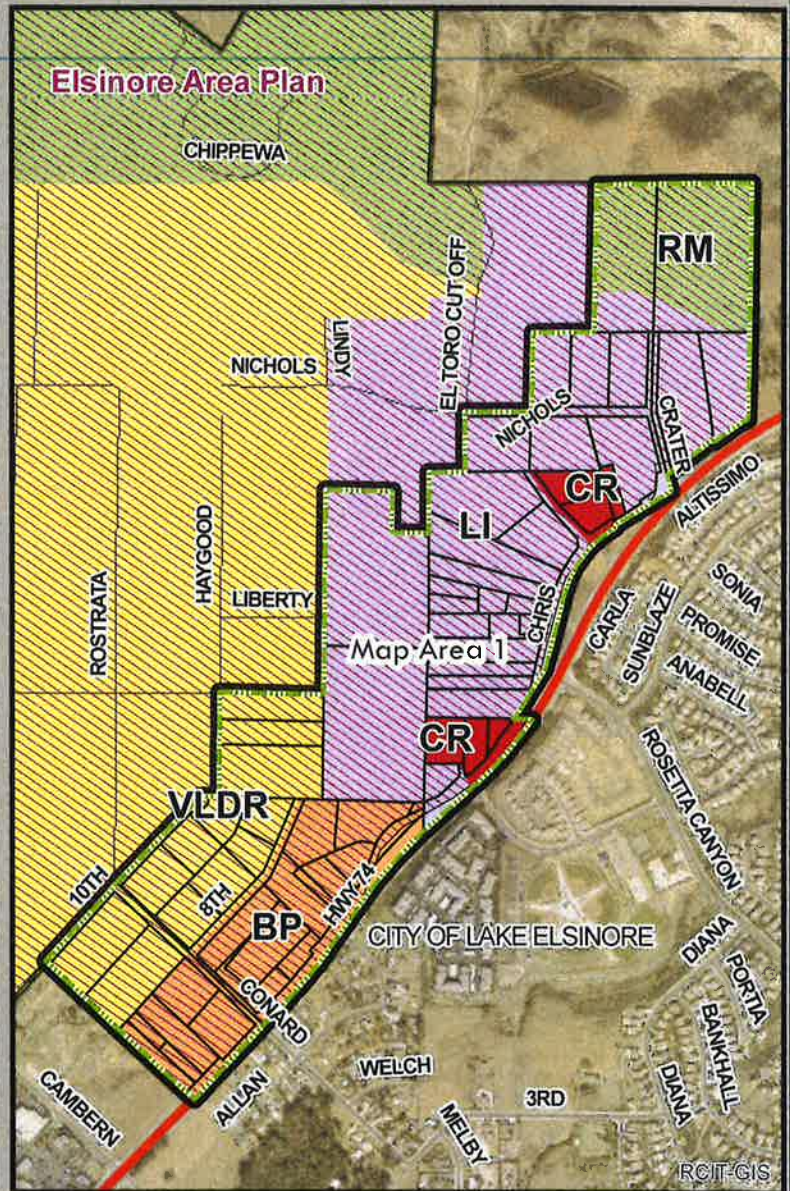
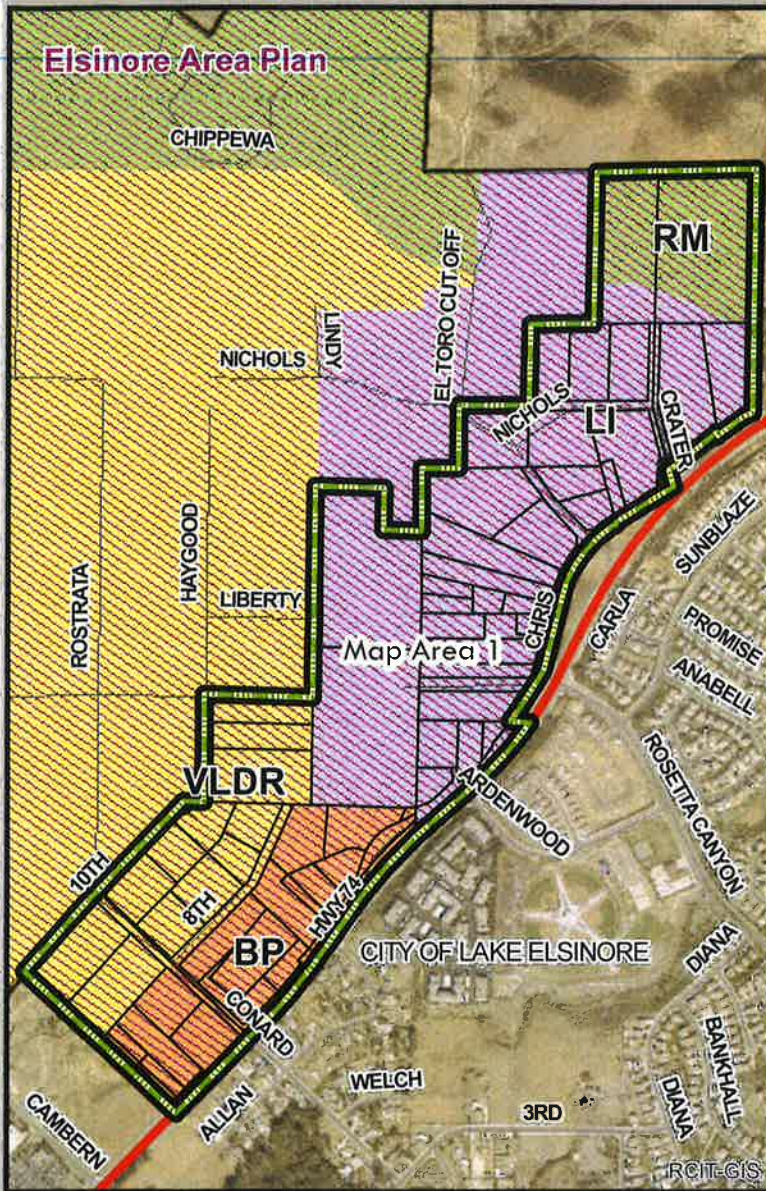


# EXHIBIT 3a: MAP AREA 1 - EXISTING AND PROPOSED LAND USE DESIGNATIONS

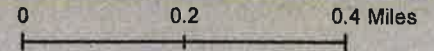







EXISTING LAND USE DESIGNATIONS

PROPOSED LAND USE DESIGNATIONS




Date: 03/27/2019







-  MAP AREA
-  HIGHWAYS
-  GENERAL PLAN: AREA PLAN BOUNDARIES
- PROPOSED POLICY AREA**
-  HIGHWAY 74 POLICY AREA (Community Plan Boundary)
- EXISTING POLICY AREAS**
-  WARM SPRINGS POLICY AREA

**GENERAL PLAN LAND USE DESIGNATIONS**

- RURAL**
-  Rural Mountainous (RM)

**COMMUNITY DEVELOPMENT**

-  Very Low Density Residential (VLDR)
-  Commercial Retail (CR)
-  Light Industrial (LI)
-  Business Park (BP)

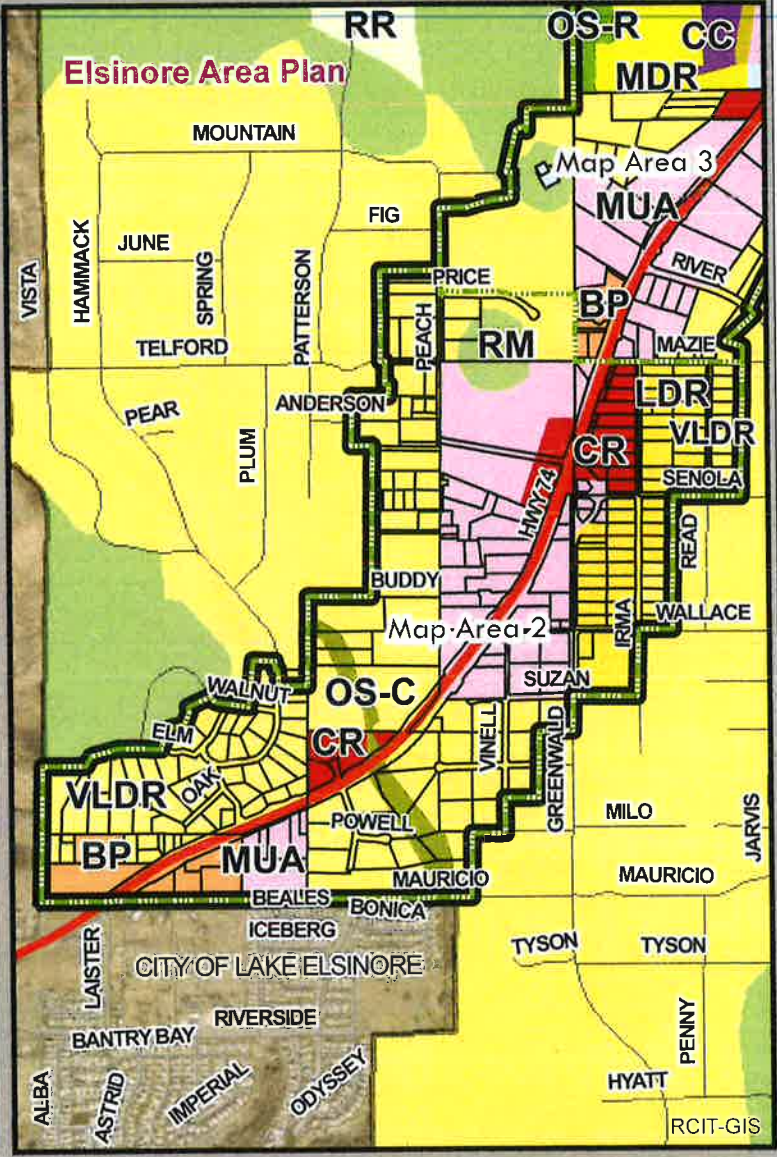
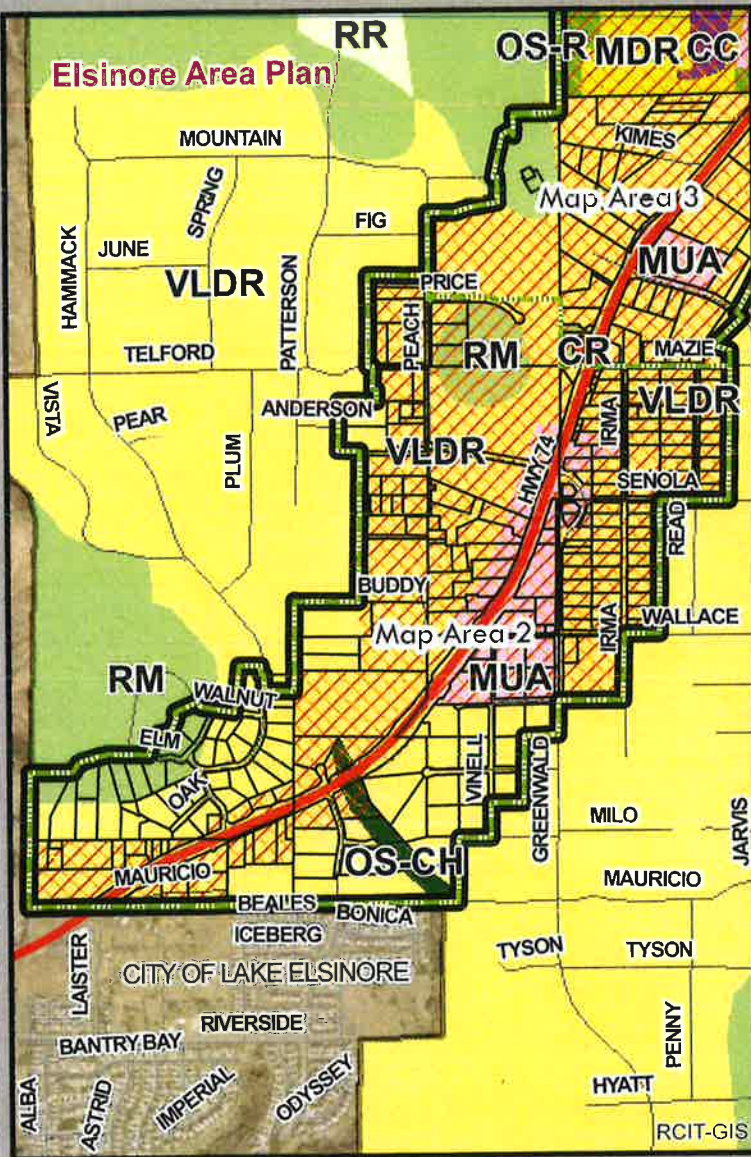


# EXHIBIT 3b: MAP AREA 2 - EXISTING AND PROPOSED LAND USE DESIGNATIONS

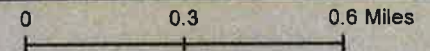


EXISTING LAND USE DESIGNATIONS

PROPOSED LAND USE DESIGNATIONS, REMOVAL OF RURAL VILLAGE LAND USE OVERLAY



Date: 03/27/2019



MAP AREA HIGHWAYS GENERAL PLAN: AREA PLAN BOUNDARIES PROPOSED POLICY AREA HIGHWAY 74 POLICY AREA (Community Plan Boundary) EXISTING OVERLAY RURAL VILLAGE LAND USE OVERLAY	<b>GENERAL PLAN LAND USE DESIGNATIONS</b>	
	<b>RURAL</b> Rural Residential (RR) Rural Mountainous (RM)	<b>COMMUNITY DEVELOPMENT</b> Very Low Density Residential (VLDR) Medium Density Residential (MDR) Medium High Density Residential (MHDR) Low Density Residential (LDR) Commercial Retail (CR) Business Park (BP) Public Facilities (PF) Community Center (CC) Mixed-Use Area (MUA)
<b>OPEN SPACE</b> Open Space Recreation (OS-R) Conservation (OS-C) Conservation Habitat (OS-CH)		

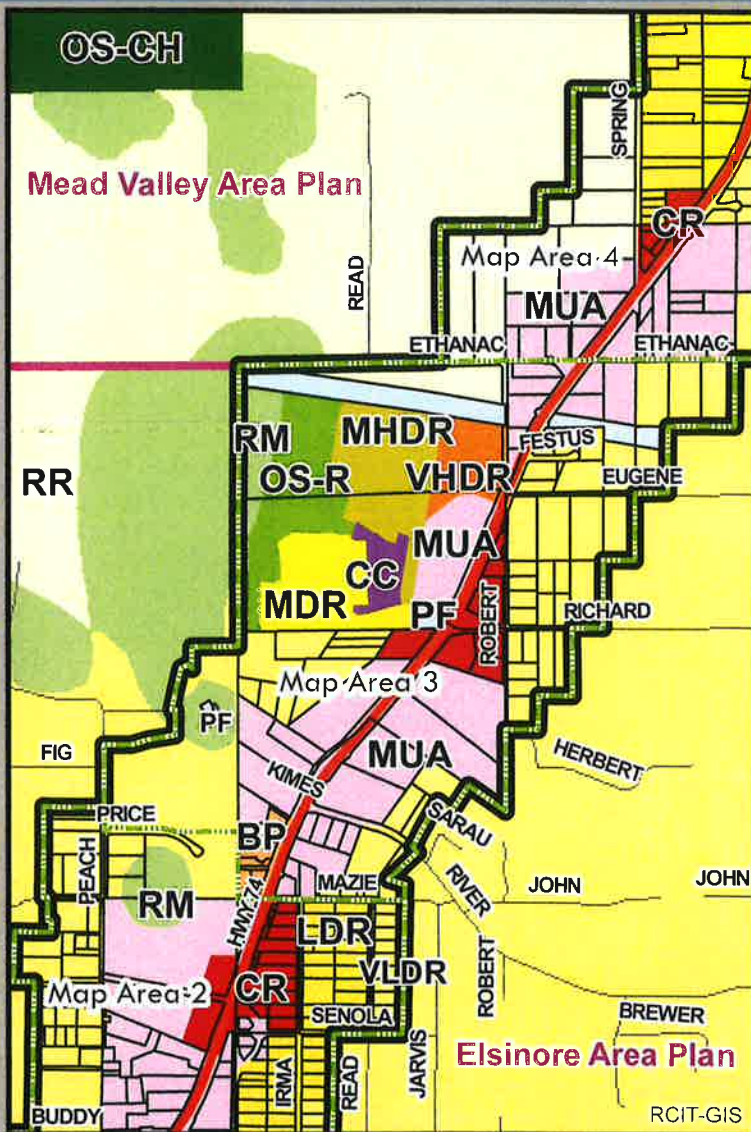
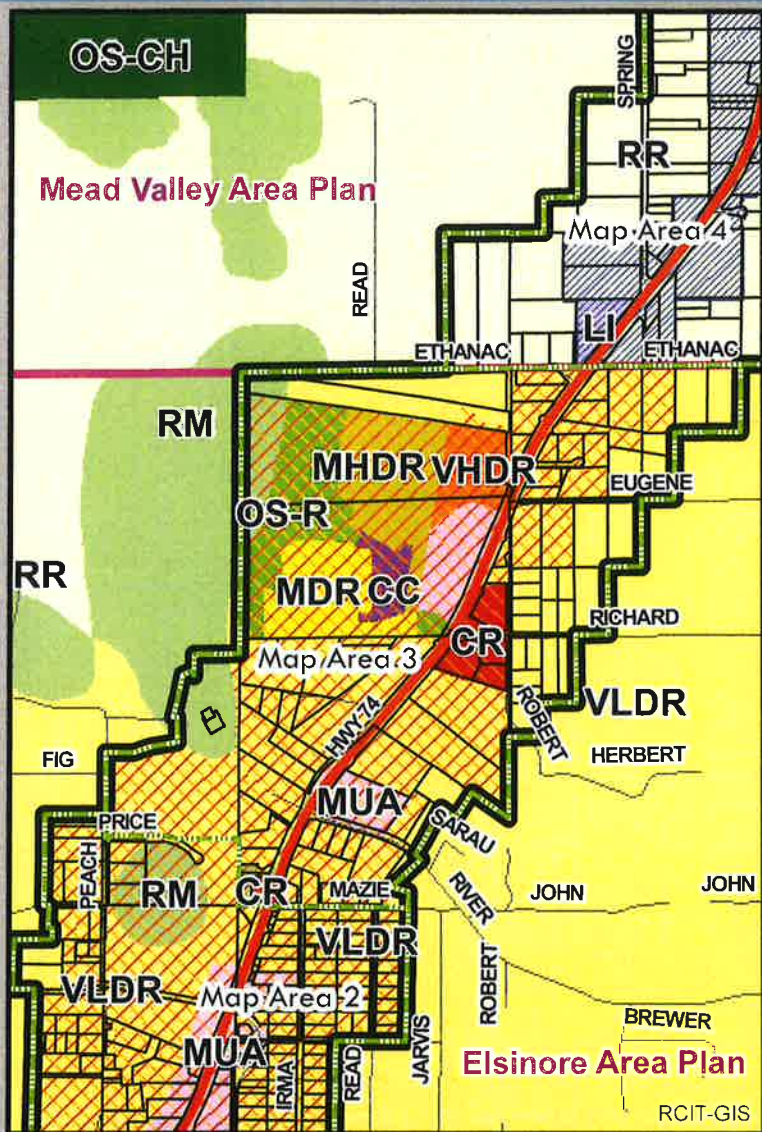


# EXHIBIT 3c: MAP AREA 3 - EXISTING AND PROPOSED LAND USE DESIGNATIONS



## EXISTING LAND USE DESIGNATIONS

## PROPOSED LAND USE DESIGNATIONS, REMOVAL OF RURAL VILLAGE LAND USE OVERLAY, REMOVAL OF HIGHWAY 74 GOODHOPE POLICY AREA



Date: 3/27/2019

0 0.3 0.6 Miles

<p> MAP AREA</p> <p> HIGHWAYS</p> <p> GENERAL PLAN: AREA PLAN BOUNDARIES</p> <p> PROPOSED POLICY AREA</p> <p> HIGHWAY 74 POLICY AREA (Community Plan Boundary)</p> <p> EXISTING OVERLAY</p> <p> RURAL VILLAGE LAND USE OVERLAY</p>	<p><b>GENERAL PLAN LAND USE DESIGNATIONS</b></p> <p><b>RURAL</b></p> <ul style="list-style-type: none"> <li> Rural Residential (RR)</li> <li> Rural Mountainous (RM)</li> </ul> <p><b>OPEN SPACE</b></p> <ul style="list-style-type: none"> <li> Open Space Recreation (OS-R)</li> <li> Conservation (OS-C)</li> <li> Conservation Habitat (OS-CH)</li> </ul> <p><b>EXISTING POLICY AREAS</b></p> <ul style="list-style-type: none"> <li> HIGHWAY 74 GOOD HOPE POLICY AREA</li> </ul>	<p><b>COMMUNITY DEVELOPMENT</b></p> <ul style="list-style-type: none"> <li> Very Low Density Residential (VLDR)</li> <li> Very High Density Residential (VHDR)</li> <li> Medium High Density Residential (MHDR)</li> <li> Medium Density Residential (MDR)</li> <li> Low Density Residential (LDR)</li> <li> Commercial Retail (CR)</li> <li> Community Center (CC)</li> <li> Light Industrial (LI)</li> <li> Public Facilities (PF)</li> <li> Mixed-Use Area (MUA)</li> </ul>
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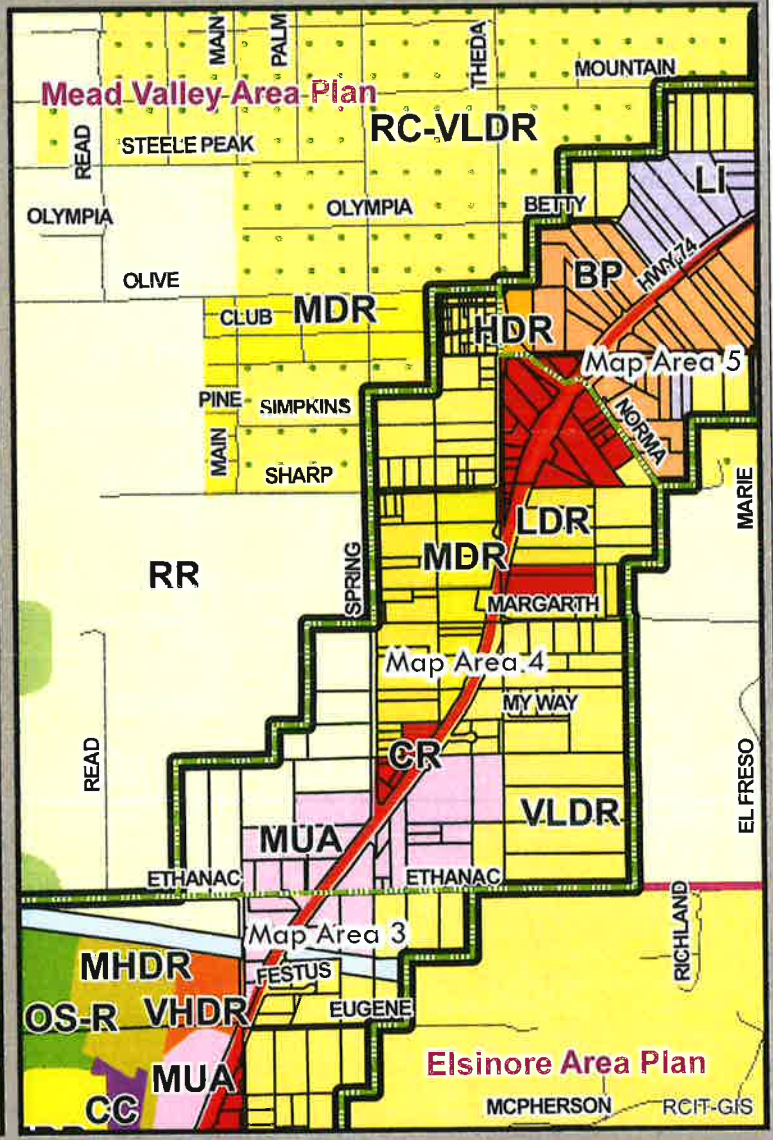
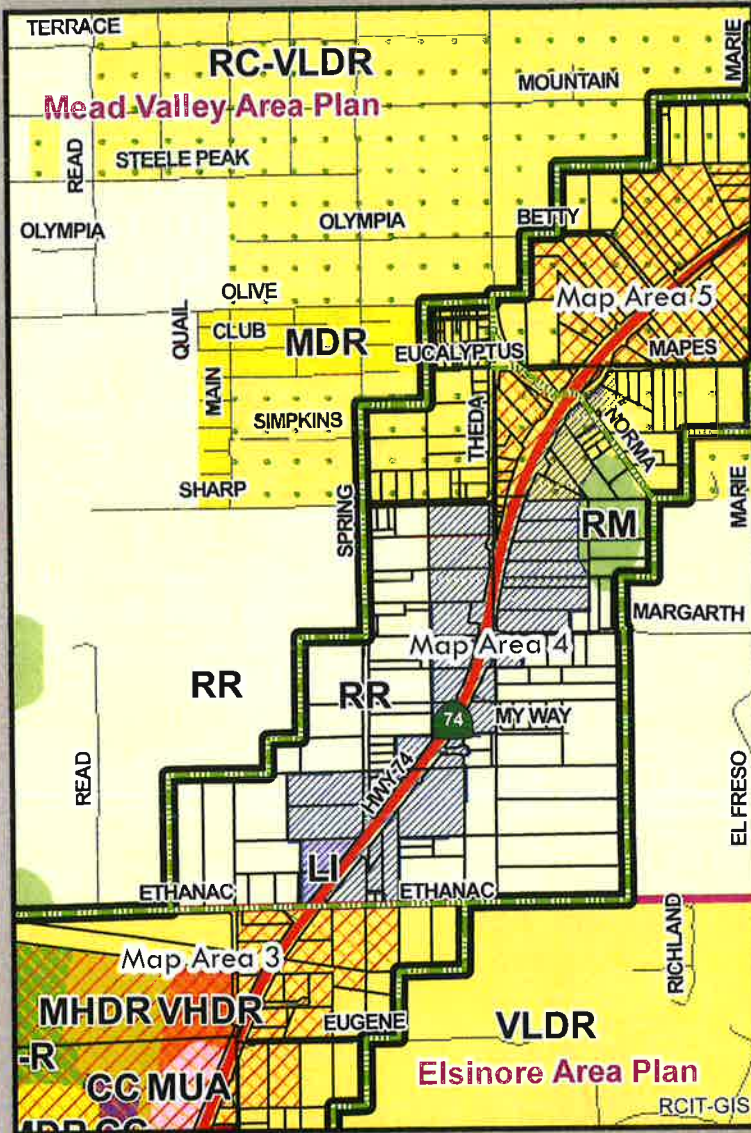


# EXHIBIT 3d: MAP AREA 4 - EXISTING AND PROPOSED LAND USE DESIGNATIONS



EXISTING LAND USE DESIGNATIONS

PROPOSED LAND USE DESIGNATIONS,  
REMOVAL OF RURAL VILLAGE LAND USE OVERLAY,  
REMOVAL OF HIGHWAY 74 GOODHOPE POLICY AREA



Date: 03/27/2019

0 0.3 0.6 Miles

- MAP AREA
- HIGHWAYS
- GENERAL PLAN: AREA PLAN BOUNDARIES
- PROPOSED POLICY AREA**
- HIGHWAY 74 POLICY AREA (Community Plan Boundary)
- EXISTING OVERLAY**
- RURAL VILLAGE LAND USE OVERLAY

**GENERAL PLAN LAND USE DESIGNATIONS**

**RURAL**

- Rural Residential (RR)
- Rural Mountainous (RM)

**RURAL COMMUNITY**

- Rural Community - Very Low Density Residential (RC-VLDR)

**OPEN SPACE**

- Open Space Recreation (OS-R)

**EXISTING POLICY AREAS**

- HIGHWAY 74 GOOD HOPE POLICY AREA

**COMMUNITY DEVELOPMENT**

- Very Low Density Residential (VLDR)
- Low Density Residential (LDR)
- Medium Density Residential (MDR)
- Medium High Density Residential (MHDR)
- High Density Residential (HDR)
- Very High Density Residential (VHDR)
- Commercial Retail (CR)
- Light Industrial (LI)
- Business Park (BP)
- Public Facilities (PF)
- Community Center (CC)
- Mixed-Use Area (MUA)

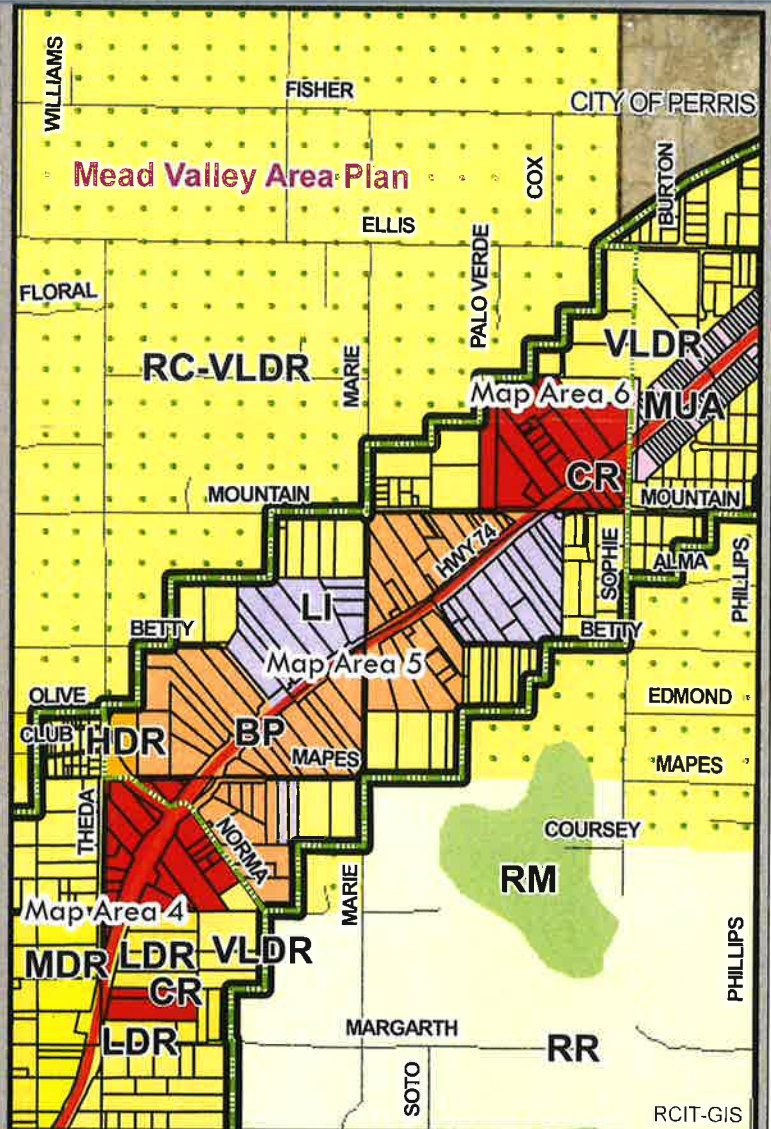
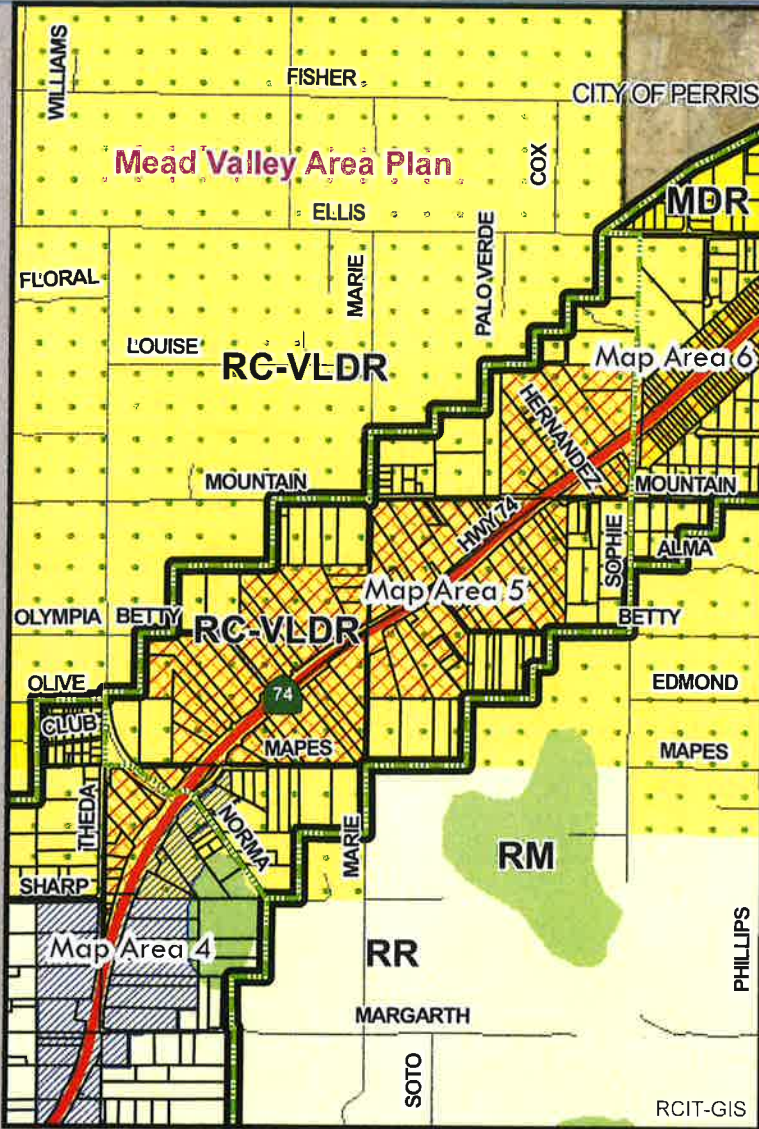


# EXHIBIT 3e: MAP AREA 5 - EXISTING AND PROPOSED LAND USE DESIGNATIONS

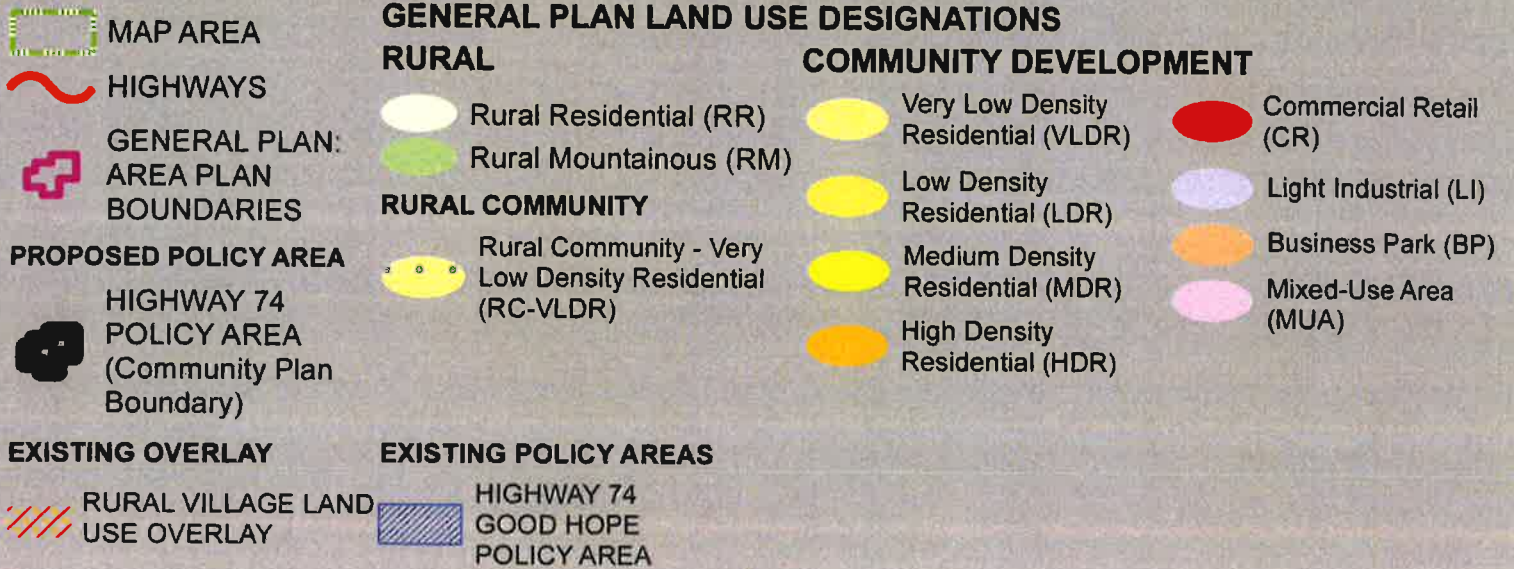
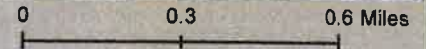


## EXISTING LAND USE DESIGNATIONS

## PROPOSED LAND USE DESIGNATIONS, REMOVAL OF RURAL VILLAGE LAND USE OVERLAY, REMOVAL OF HIGHWAY 74 GOODHOPE POLICY AREA



Date: 03/27/2019



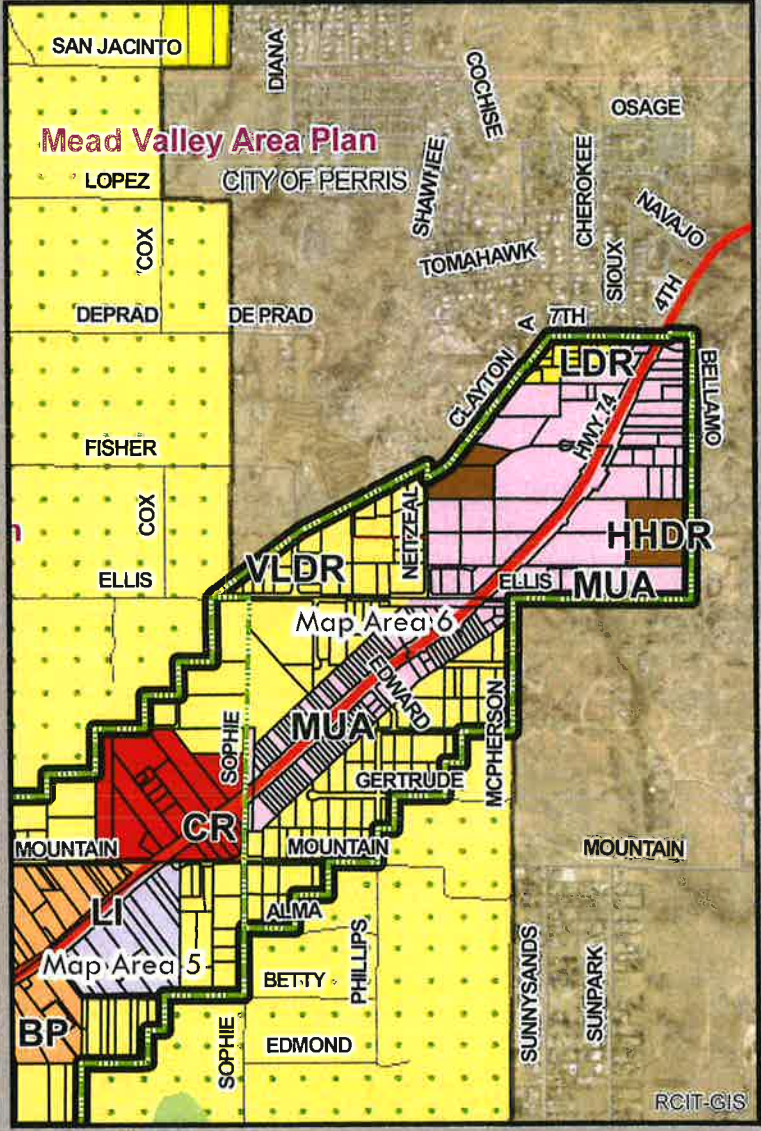
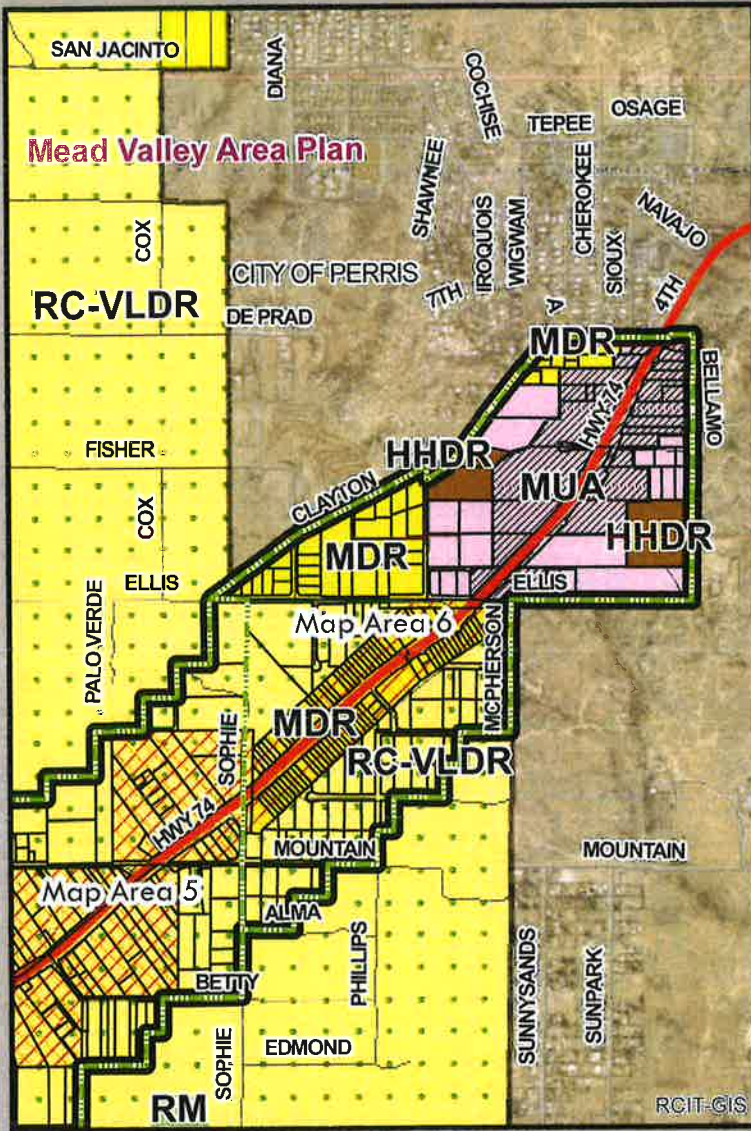


# EXHIBIT 3f: MAP AREA 6 - EXISTING AND PROPOSED LAND USE DESIGNATIONS

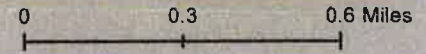


## EXISTING LAND USE DESIGNATIONS

## PROPOSED LAND USE DESIGNATIONS, REMOVAL OF RURAL LAND USE VILLAGE OVERLAY, REMOVAL OF HIGHWAY 74 PERRIS POLICY AREA



Date: 03/27/2019



<b>GENERAL PLAN LAND USE DESIGNATIONS</b>	
<b>RURAL</b>	<b>COMMUNITY DEVELOPMENT</b>
Rural Mountainous (RM)	Very Low Density Residential (VLDR)
<b>RURAL COMMUNITY</b>	Low Density Residential (LDR)
Rural Community - Very Low Density Residential (RC-VLDR)	Medium Density Residential (MDR)
	Highest Density Residential (HHDR)
	Commercial Retail (CR)
	Mixed-Use Area (MUA)
	Business Park (BP)
	Light Industrial (LI)
MAP AREA	
HIGHWAYS	
GENERAL PLAN: AREA PLAN BOUNDARIES	
PROPOSED POLICY AREA	
HIGHWAY 74 POLICY AREA (Community Plan Boundary)	
EXISTING OVERLAY	
RURAL VILLAGE LAND USE OVERLAY	
EXISTING POLICY AREAS	
HIGHWAY 74 PERRIS POLICY AREA	



**From:** Dilip Sheth [mailto:[dsheth2737@yahoo.com](mailto:dsheth2737@yahoo.com)]

**Sent:** Monday, June 10, 2019 8:42 AM

**To:** Nanthavongdouangsy, Phayvanh <[PNANTHAV@RIVCO.ORG](mailto:PNANTHAV@RIVCO.ORG)>

**Subject:** Fw: EIR for the Highway -74 Community Plan(General Plan Amendment No. 1205 and Zone Consistency Program

Hi Ms. Phayvanh,

I represent the owners several of parcels of land in the subject Community plan in the Elsinore Plan Area.

The parcels nos. are as follows :

APN 345-150-032

APN 345-150-008

APN 345-150-042

APN 345-150-036

We have been accumulating these parcels for several years for a Commercial/Mixed Use project. We have been attending the meetings for the past several years where these parcels were proposed to be zoned as commercial and all of a sudden,we received the notice last month that proposed land use for these parcels under the subject is going to be Very Low Density Residential - VLDR.This is a complete reversal of what we have been told over and over for the last few years and are in total disagreement with your proposed zoning of VLDR after planning for a commercial project for the last five years and accumulating these land parcels at commercial land prices.

The parcels across the Highway-74 from these parcels are proposed to be zoned Very High Density Residential -VHDR.

The parcels north of our parcels and on the same side of Highway-74 are proposed to be zoned Mixed Use Area-MUA.

The parcels to the south of our parcels along Highway-74 are proposed Commercial Retail.

Our parcels have better access than most of these parcels proposed as Commercial Retail, Mixed Use Area and VHDR and have one of the few left turn lanes from Highway-74 making them more suitable for Commercial Retail/VHDR/MUA development.

Please reconsider zoning the four parcels as CR/MUA/VHDR.

I will like to meet with you to discuss the proposed zoning for these parcels at your earliest.

You can reach me at 310-266-2754.

Please confirm receipt of this e-mail.

Thanking you for your kind reconsideration of the proposed zoning.

**COPY**



June 10, 2019

Attn: Phayvanh Nanthavongdouangsy  
County of Riverside  
4080 Lemon Street 12<sup>th</sup> Floor  
Riverside, CA 92501

**Subject: Highway 74 Community Plan (GPA No. 1205) and Zone Consistency Program**  
**Location: Unincorporated Communities between City of Perris and Lake Elsinore along Highway 74, Riverside County**  
**Project Description: Proposed to master plan future development along a 6.8 mile long corridor of Hwy 74**

Attn: Phayvanh Nanthavongdouangsy

Eastern Municipal Water District (EMWD) thanks you for the opportunity to review the Public Notice Hearing on the Preparation of a Draft Environmental Impact Report for the Highway 74 Community General Plan Amendment No. 1205. The Notice of Preparation proposes to address topics related to the General Plan Village Rural Use Overlays, Policy Areas, Foundation Components, such as policies, trails, and road classifications. The Highway 74 Community Plan is generally, unincorporated is located between City of Perris and Lake Elsinore. The project will also include a Zone Consistency Program that will recommend parcel specific zone classifications that are consistent with the proposed land use designations. The project encompasses an area of approximately 2,220 acres. EMWD offers the following comments:

EMWD would like to point out that completed Water and Wastewater Master Plans have identified backbone facilities based on current land use. The Programmatic EIR (PEIR) shall evaluate the Project's water demands and sewer discharge, and determine if the remaining available capacity in the existing EMWD facilities can adequately serve this Project. If the existing EMWD facilities do not have enough capacity, then the PEIR shall identify the additional improvements and facilities necessary to provide adequate service to the project area. To help in this effort, EMWD can assist the Project proponent in formulating EMWD's Development

Board of Directors

David J. Slavron, *President*   Ronald W. Sullivan, *Vice President*   Stephen J. Corona   Philip E. Paule   Randy A. Record

2270 Trumble Road • P.O. Box 8300 • Perris, CA 92572-8300

T 951.928.3777 • F 951.928.6177   [www.emwd.org](http://www.emwd.org)

Attn: Phayvanh Nanthavongdouangsy

June 10, 2019

Page 2

Design Conditions (DDC), formerly known as the Plan of Service (POS), to detail all pertinent water and sewer facilities.

If you have questions or concerns, please do not hesitate to contact me at (951) 928-3777, extension 4468 or by email at [El-hagem@emwd.org](mailto:El-hagem@emwd.org).

Sincerely,



Maroun El-Hage, MPA, MS, PE

Senior Civil Engineer

Development Services Department

Eastern Municipal Water District

MEH:kpm

Attachment(s)/Enclosure(s): Copy of Public Notice

c: pnanthavongdouangsy

U.S. Department of Homeland Security  
FEMA Region IX  
1111 Broadway, Suite 1200  
Oakland, CA. 94607-4052



June 10, 2019

Phayvanh Nanthavongdouangsy, Principal Planner  
Riverside County Planning Department  
Riverside County  
4080 Lemon Street, 12<sup>th</sup> Floor  
Riverside, California 92502-1409

Dear Phayvanh Nanthavongdouangsy:

This is in response to your request for comments regarding the County of Riverside, Notice of Preparation of a Draft Program Environmental Impact Report for Highway 74 Community Plan (General Plan Amendment No. 1205 and Zone Consistency Program).

Please review the current effective Flood Insurance Rate Maps (FIRMs) for the County of Riverside (Community Number 060245), Maps revised March 6, 2018. Please note that the County of Riverside, California is a participant in the National Flood Insurance Program (NFIP). The minimum, basic NFIP floodplain management building requirements are described in Vol. 44 Code of Federal Regulations (44 CFR), Sections 59 through 65.

A summary of these NFIP floodplain management building requirements are as follows:

- All buildings constructed within a riverine floodplain, (i.e., Flood Zones A, AO, AH, AE, and A1 through A30 as delineated on the FIRM), must be elevated so that the lowest floor is at or above the Base Flood Elevation level in accordance with the effective Flood Insurance Rate Map.
- If the area of construction is located within a Regulatory Floodway as delineated on the FIRM, any *development* must not increase base flood elevation levels. **The term *development* means any man-made change to improved or unimproved real estate, including but not limited to buildings, other structures, mining, dredging, filling, grading, paving, excavation or drilling operations, and storage of equipment or materials.** A hydrologic and hydraulic analysis must be performed *prior* to the start of development, and must demonstrate that the development would not cause any rise in base flood levels. No rise is permitted within regulatory floodways.

Phayvanh Nanthavongdouangsy, Principal Planner  
Page 2  
June 10, 2019

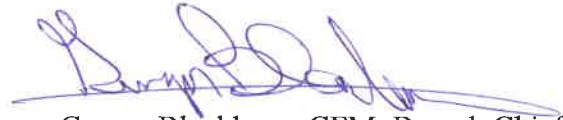
- All buildings constructed within a coastal high hazard area, (any of the “V” Flood Zones as delineated on the FIRM), must be elevated on pilings and columns, so that the lowest horizontal structural member, (excluding the pilings and columns), is elevated to or above the base flood elevation level. In addition, the posts and pilings foundation and the structure attached thereto, is anchored to resist flotation, collapse and lateral movement due to the effects of wind and water loads acting simultaneously on all building components.
- Upon completion of any development that changes existing Special Flood Hazard Areas, the NFIP directs all participating communities to submit the appropriate hydrologic and hydraulic data to FEMA for a FIRM revision. In accordance with 44 CFR, Section 65.3, as soon as practicable, but not later than six months after such data becomes available, a community shall notify FEMA of the changes by submitting technical data for a flood map revision. To obtain copies of FEMA’s Flood Map Revision Application Packages, please refer to the FEMA website at <http://www.fema.gov/business/nfip/forms.shtm>.

**Please Note:**

Many NFIP participating communities have adopted floodplain management building requirements which are more restrictive than the minimum federal standards described in 44 CFR. Please contact the local community’s floodplain manager for more information on local floodplain management building requirements. The Riverside County floodplain manager can be reached by calling Jason Uhley, General Manager and Chief Engineer, at (951) 955-1265.

If you have any questions or concerns, please do not hesitate to call me at (510) 627-7186.

Sincerely,



Gregor Blackburn, CFM, Branch Chief  
Floodplain Management and Insurance Branch

cc:

Jason Uhley, General Manager & Chief Engineer, County of Riverside  
Garrett Tam Sing, State of California, Department of Water Resources, Southern Region Office  
Gregor Blackburn, CFM, Branch Chief, Floodplain Management and Insurance Branch,  
DHS/FEMA Region IX  
Alessandro Amaglio, Environmental Officer, DHS/FEMA Region IX

From: Lana Anders [mailto:[ланаандерс@icloud.com](mailto:ланаандерс@icloud.com)]  
Sent: Friday, May 17, 2019 10:03 AM  
To: Nanthavongdouangsy, Phayvanh <[PNANTHAV@RIVCO.ORG](mailto:PNANTHAV@RIVCO.ORG)>  
Subject: Highway 74 Community Plan

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

Thank you for coming to the Moses-Schaffer Community Center yesterday evening for the presentation of the Highway 74 Community Plan. I have a few concerns/questions about the proposed development:

1. I own 10 acres on the corner of Theda St. & Ethanac Rd. (parcel #3451000-18) and would like to opt into the community plan with a designation of commercial use. I think with the Ethanac Expressway eventually coming through that it will become a commercial site in the long run. I was mentioned in the meeting that time and money would be saved by rezoning before selling the property.
2. The proposed Ethanac Expressway shows 2 possible alignments from Highway 74 to Ethanac: The 1A-Direct Alignment and the 1B Curved Alignment. Depending on which alignment is eventually chosen, it will effect land use designations.
3. I attended a community meeting in May and we were informed a Motocross business is going in on 90 acres on the west side of Ethanac Road. This is the other side of Highway 74 from my property. I have concerns about the noise level that will impact property owners in our area. The noise levels once the Motoross is up and running will most likely also adversely impact anyone wanting to buy property nearby. From my property I can hear the motorcycles at the Perris Speedway on Ellis Road so I think this is a big concern.

Thank you and your team for working on this large complicated project. Please keep me informed as the project progresses,

Lana S Anders  
Email: [ланаандерс@icloud.com](mailto:ланаандерс@icloud.com)

# MARCH JOINT POWERS AUTHORITY



May 10, 2019

**Phayvanh Nanthavongdouangsy**  
Planner  
Riverside County Planning Department  
4080 Lemon Street, 12<sup>th</sup> Floor  
Riverside, CA 92501

**RE: Notice of Preparation of a Draft Program Environmental Impact Report (EIR) and Notice of EIR Scoping Meeting for the Highway 74 Community Plan (General Plan Amendment No. 1205 and Zone Consistency Program)**

Dear Phayvanh:

Thank you for the opportunity to comment on the above aforementioned project. March Joint Powers Authority staff has completed their review of the **Notice of Preparation of a Draft Program Environmental Impact Report (EIR) and Notice of EIR Scoping Meeting for the Highway 74 Community Plan (General Plan Amendment No. 1205 and Zone Consistency Program)**.

We have determined that the proposed project is not within the jurisdiction of the March Joint Powers Authority and have no further comment at this time. If you have any questions regarding our comments or need additional information, please feel free to contact me at (951) 656-7000, or by email at, smith@marchjpa.com. Thank you.

Sincerely,

A handwritten signature in blue ink, reading "Jeffrey M. Smith". The signature is fluid and cursive, with the first name being the most prominent.

**Jeffrey M. Smith, AICP**  
Senior Planner  
March Joint Powers Authority





**PECHANGA CULTURAL RESOURCES**  
*Temecula Band of Luiseño Mission Indians*

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

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Neal Ibanez

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Darlene Miranda  
Evie Gerber  
Richard B. Scearce, III  
Robert Villalobos

Director:  
Gary DuBois

Coordinator:  
Paul Macarro

Cultural Analyst:  
Tuba Ebru Ozdil

Planning Specialist:  
Molly E. Escobar

June 10, 2019

**VIA E-MAIL and USPS**

Ms. Phayvanh Nanthavongdouangsy  
Project Planner  
County of Riverside, Planning Dept  
4080 Lemon Street, 12<sup>th</sup> Floor  
Riverside, CA 92502

**Re: Pechanga Tribe Comments on the Notice of Preparation for a Draft Environmental Impact Report on the Highway 74 Community Plan – General Plan Amendment No. 1205**

Dear Ms. Nanthavongdouangsy

This comment letter is written on behalf of the Pechanga Band of Luiseño Indians (hereinafter, “the Tribe”), a federally recognized Indian tribe and sovereign government. The Tribe formally requests, pursuant to Public Resources Code §21092.2, to be notified and involved in the entire CEQA environmental review process for the duration of the above referenced project (the “Project”). Please add the Tribe to your distribution list(s) for public notices and circulation of all documents, including environmental review documents, archeological reports, and all documents pertaining to this Project. The Tribe further requests to be directly notified of all public hearings and scheduled approvals concerning this Project. Please also incorporate these comments into the record of approval for this Project.

The Tribe submits these comments concerning the Project's potential impacts to cultural resources in conjunction with the environmental review of the Project and to assist the County in developing appropriate avoidance and preservation standards for the potentially significant Luiseño cultural resources that the Project could impact. Highway 74 Community Plan traverses through a Traditional Cultural Property (TCP), North Lake Elsinore, and development of proposed land use in the future will may impact a number of known cultural sites and will visually impact several more sites that are located within close vicinity. Further, the proposed community plan boundary is bordering another TCP, Meadowbrook, and Tribal Trust Lands located in Meadowbrook. The Tribes land in Meadowbrook is legally aformal, non-contiguous part of the Tribe’s reservation land, making the Pechanga Tribe the closest Native American Tribe to the proposed Community Plan.

In order to comply with CEQA and other laws, it is imperative that the County consult with the Tribe in order to guarantee an adequate knowledge base for an appropriate evaluation of the Community plan's proposed land uses, as well as to generate adequate policies and mitigation measures. Thus, the Tribe requests to be involved and participate with the County in assuring that an adequate environmental assessment is completed. The Tribe would like to work with the County in developing appropriate avoidance measures, and implementing specific policies that will be implemented during entitlement project within the proposed community plan area. Because this proposed Community Plan is subject to AB 51 and SB 18, and there is a well-documented tribal cultural resource (TCPs) that will be subject to substantial adverse effects, we note that the DEIR must include a discussion of the resources, along with the tribal values ascribed to it by the Atáaxum (Luiseño).

In addition, given the sensitivity of the Project area, it is the position of the Pechanga Tribe that professional Pechanga tribal monitors be present during all archeological surveys and studies, as well as during all ground-disturbing activities conducted in connection with this Community Plan, including any archeological excavations performed. In addition, the Tribe requests to participate in this Community Plan project, since this project is processing a General Plan Amendment and to begin SB18 consultation with the County as well as AB 52.

**THE COUNTY OF RIVERSIDE MUST INCLUDE INVOLVEMENT OF AND  
CONSULTATION WITH THE PECHANGA TRIBE IN ITS ENVIRONMENTAL  
REVIEW PROCESS**

It has been the intent of the Federal Government<sup>1</sup> and the State of California<sup>2</sup> that Indian tribes be consulted with regard to issues which impact cultural and spiritual resources, as well as other governmental concerns. The responsibility to consult with Native American tribes stems from the unique government-to-government relationship between the United States and Indian tribes. This arises when tribal interests are affected by the actions of governmental agencies and departments. In this case, it is undisputed that the project lies within the Pechanga Tribe's traditional territory. Therefore, in order to comply with CEQA and other applicable Federal and California law, it is imperative that the County of Riverside consult with the Tribe in order to guarantee an adequate knowledge base for an appropriate evaluation of the Project effects, as well as generating adequate mitigation measures.

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<sup>1</sup>See e.g., Executive Memorandum of April 29, 1994 on Government-to-Government Relations with Native American Tribal Governments, Executive Order of November 6, 2000 on Consultation and Coordination with Indian Tribal Governments, Executive Memorandum of September 23, 2004 on Government-to-Government Relationships with Tribal Governments, and Executive Memorandum of November 5, 2009 on Tribal Consultation.

<sup>2</sup> See California Public Resource Code §5097.9 et seq.; California Government Code §§65351, 65352.3 and 65352.4

**LEAD AGENCY CONSULTATION WITH THE PECHANGA TRIBE REQUIRED**  
**PURSUANT TO CAL. GOVT. C. §§ 65351, 65352, 65352.3, AND 65352.4**  
**(SENATE BILL 18 – TRADITIONAL TRIBAL CULTURAL PLACES LAW)**

As a General Plan Amendment will be processed for this Project, the Lead Agency is required to consult with the Pechanga Tribe pursuant to a State law entitled Traditional Tribal Cultural Places (also known as SB 18; Cal. Govt. C. § 65352.3). The purpose of consultation is to identify any Native American sacred places and any geographical areas which could potentially yield sacred places, identify proper means of treatment and management of such places, and to ensure the protection and preservation of such places through agreed upon mitigation (Cal. Govt. C. 65352.3; SB18, Chapter 905, Section 1(4)(b)(3)). Consultation must be government-to-government, meaning directly between the Tribe and the Lead Agency, seeking agreement where feasible (Cal. Govt. C. § 65352.4; SB18, Chapter 905, Section 1(4)(b)(3)). Lastly, any information conveyed to the Lead Agency concerning Native American sacred places shall be confidential in terms of the specific identity, location, character and use of those places and associated features and objects. This information is not subject to public disclosure pursuant the California Public Records Act (Cal. Govt. C. 6254(r)). The Tribe looks forward to receiving our SB18 notification and to begin consultation with the County.

**PECHANGA CULTURAL AFFILIATION TO PROJECT AREA**

The Pechanga Tribe asserts that the Project area is part of the Tribe’s aboriginal territory, as evidenced by the existence of Luiseño place names, rock art, pictographs, petroglyphs, a village complex and an extensive Luiseño artifact record in the vicinity of the Project. The Tribe further asserts that this culturally sensitive area is affiliated specifically with the Pechanga Band of Luiseño Indians because of the Tribe’s specific cultural ties to this area, the recorded TCPs, sacred sites, as well as a Tribal Trust Lands located in Meadowbrook. The Tribe considers any resources located on this Project property to be Pechanga cultural resources.

D. L. True, C. W. Meighan, and Harvey Crew<sup>3</sup> stated that the California archaeologist is blessed “with the fact that the nineteenth-century Indians of the state were direct descendents of many of the Indians recovered archaeologically, living lives not unlike those of their ancestors.” Similarly, the Tribe knows that their ancestors lived on this land and that the Luiseño peoples still live in their traditional lands. The Tribe’s knowledge of our ancestral boundaries is based on reliable information passed down to us from our elders; published academic works in the areas of anthropology, history and ethno-history; and through recorded ethnographic and linguistic accounts. Many anthropologists and historians who have presented boundaries of the Luiseño traditional territory have included the Project area in their descriptions (Drucker 1937; Heiser and Whipple 1957; Kroeber 1925; Smith and Freers 1994), and such territory descriptions correspond with what was communicated to the Pechanga people by our elders. While we agree that

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<sup>3</sup> D. L. True, C. W. Meighan, and Harvey Crew. Archaeological Investigations at Molpa, San Diego County, California, *University of California Press* 1974 Vol. 11, 1-176

anthropological and linguistic theories as well as historic accounts are important in determining traditional Luiseño territory, the most critical sources of information used to define our traditional territories are our songs, creation accounts and oral traditions.

Luiseño history originates with the creation of all things at *'éxva Teméeku*, the present day City of Temecula, and dispersing out to all corners of creation (what is today known as Luiseño territory). It was at Temecula that the Luiseño deity *Wuyóot* lived and taught the people, and here that he became sick, finally expiring at Lake Elsinore. Many of our songs relate the tale of the people taking the dying *Wuyóot* to the many hot springs at Elsinore, where he died (DuBois 1908). He was cremated at *'éxva Teméeku*. It is the Luiseño creation account that connects Elsinore to Temecula. From Elsinore, the people spread out, establishing villages and marking their territories in the surrounding areas such as Mead Valley, Menifee/Sun City, Perris, and the unincorporated areas of western Riverside County. The first people also became the mountains, plants, animals and heavenly bodies.

Many traditions and stories are passed from generation to generation by songs. One of the Luiseño songs recounts the travels of the people to Elsinore after a great flood (DuBois 1908). From here, they again spread out to the north, south, east and west. Three songs, called *Moníivol*, are songs of the places and landmarks that were destinations of the Luiseño ancestors, several of which are located near the Project area. They describe the exact route of the Temecula (Pechanga) people and the landmarks made by each to claim title to places in their migrations (DuBois 1908:110). In addition, Pechanga elders state that the Temecula/Pechanga people had usage/gathering rights to an area extending from Rawson Canyon on the east, over to Lake Mathews on the northwest, down Temescal Canyon to Temecula, eastward to Aguanga, and then along the crest of the Cahuilla range back to Rawson Canyon. The Project area is located within the central area of this culturally affiliated territory. The Native American Heritage Commission (NAHC) Most Likely Descendent (MLD) files substantiate this habitation and migration record from oral tradition. These examples illustrate a direct correlation between the oral tradition and the physical place; proving the importance of songs and stories as a valid source of information outside of the published anthropological data.

*Tóota yixélval* (rock art) is also an important element in the determination of Luiseño territorial boundaries. *Tóota yixélval* can consist of petroglyphs (incised) elements, or pictographs (painted) elements. The science of archaeology tells us that places can be described through these elements. Riverside and Northern San Diego Counties are home to red-pigmented pictograph panels. Archaeologists have adopted the name for these pictograph-versions, as defined by Ken Hedges of the Museum of Man, as the San Luis Rey style. The San Luis Rey style incorporates elements which include chevrons, zig-zags, dot patterns, sunbursts, handprints, net/chain, anthropomorphic (human-like) and zoomorphic (animal-like) designs. Tribal historians and photographs inform us that some design elements are reminiscent of Luiseño ground paintings. A few of these design elements, particularly the flower motifs, the net/chain and zig-zags, were sometimes depicted in Luiseño basket designs and can be observed in remaining baskets and textiles today.

An additional type of *tóota yixelval*, identified by archaeologists also as rock art or petroglyphs, are cupules. Throughout Luiseño territory, there are certain types of large boulders, taking the shape of mushrooms or waves, which contain numerous small pecked and ground indentations, or cupules. Many of these cupule boulders have been identified within a few miles of the Project. Additionally, according to historian Constance DuBois:

When the people scattered from Ekvo Temeko, Temecula, they were very powerful. When they got to a place, they would sing a song to make water come there, and would call that place theirs; or they would scoop out a hollow in a rock with their hands to have that for their mark as a claim upon the land. The different parties of people had their own marks. For instance, Albañas's ancestors had theirs, and Lucario's people had theirs, and their own songs of Munival to tell how they traveled from Temecula, of the spots where they stopped and about the different places they claimed (1908:158).

The Tribe also knows that the Project is situated between larger clusters of habitation areas which make up the village complex in this area. Therefore, the activity areas located within the Project boundaries are associated with these surrounding areas and create an intensive pattern of land use, trade, travel, subsistence sharing and the practice of traditional and religious ceremonies.

Waterways were highly important to the Luiseño ancestors. According to our records, there are several blue-line streams located within the community plan. The Tribe has worked on nearby projects and have found that often there are cultural resources situated on either bank of the water source. The Tribe is highly concerned that there are resources located both on the surface and subsurface, which needs to be an appropriate land use designation and/or policy to protect them from any future impacts.

Our songs and stories, as well as academic works and recorded archaeological/cultural sites, demonstrate that the Luiseño people who occupied the area are ancestors of the present-day Pechanga Band of Luiseño Indians, and as such, Pechanga is the appropriate culturally affiliated tribe for projects that impact this geographic area.

The Tribe welcomes the opportunity to meet with the County to further explain and provide documentation concerning our specific cultural affiliation to lands associated with this Project.

### **PROJECT IMPACTS TO CULTURAL RESOURCES AND TRIBAL INVOLVEMENT**

The proposed Project is located in a sensitive region of Luiseño territory. The Tribe has over thirty-five (35) years of experience in working with various types of projects throughout its territory. The combination of this knowledge and experience, along with the knowledge of the

culturally-sensitive areas and oral tradition, is what the Tribe relies on to make fairly accurate predictions regarding the likelihood of surface and subsurface resources in a particular location.

The Pechanga Tribe is not opposed to this Community Plan; however, we are opposed to any direct, indirect and cumulative impacts this Project may have to tribal cultural resources. The Tribe's primary concerns stem from the Project's proposed impacts on Native American cultural resources. The Tribe is concerned about both the protection of unique and irreplaceable cultural resources, such as Luiseño village sites, sacred sites and archaeological items which would be impacted by the proposed Community Plan and associated development once it is adopted. The Tribe requests to be involved and participate with the County of Riverside in assuring that an adequate environmental assessment is completed, including all cultural and archaeological studies and analysis, as well as TCP analysis that includes tribal values ascribed to it by the Atáaxum, and in developing all preservation, avoidance, monitoring and mitigation plans and measures to be implemented for the Community Plan. The Tribe further requests that all proposed archaeological excavation be postponed until the Tribe can meet with the County, the Applicant and the Project archaeologist to determine the best course for preservation and mitigation.

The CEQA Guidelines state that lead agencies should make provisions for inadvertent discoveries of cultural resources (CEQA Guidelines §15064.5). The Tribe believes that adequate cultural resources assessments and management must always include a component which addresses inadvertent discoveries. Every major State and Federal law dealing with cultural resources includes provisions addressing inadvertent discoveries (See e.g.: CEQA (Cal. Pub. Resources Code §21083.2(i); 14 CCR §1506a.5(f)); Section 106 (36 CFR §800.13); NAGPRA (43 CFR §10.4). Moreover, most state and federal agencies have guidelines or provisions for addressing inadvertent discoveries (See e.g.: FHWA, Section 4(f) Regulations - 771.135(g); CALTRANS, Standard Environmental Reference - 5- 10.2 and 5-10.3). Because of the extensive presence of the Tribe's ancestors within the Project area, it is not unreasonable to expect to find vestiges of that presence. Such cultural resources and artifacts are significant to the Tribe as they are reminders of their ancestors. Moreover, the Tribe is expected to protect and assure that all cultural sites of its ancestors are appropriately treated in a respectful manner. Therefore, as noted previously, it is crucial to adequately address the potential for inadvertent discoveries.

Further, the Pechanga Tribe believes that if human remains are discovered, State law would apply and the mitigation measures for the permit must account for this. According to the California Public Resources Code, § 5097.98, if Native American human remains are discovered, the Native American Heritage Commission must name a "most likely descendant," who shall be consulted as to the appropriate disposition of the remains. Given the Project's location in Pechanga territory, the Pechanga Tribe intends to assert its right pursuant to California law with regard to any remains or items discovered in the course of this Project.

The Tribe further believes that a DEIR is not complete unless all impacts to cultural resources has been thoroughly vetted and analyzed, especially concerning the auditory and visual impacts, cumulative impacts and the growth-related or long-term impacts that a proposed

Community Plan will have. As discussed above, there are numerous habitation areas located within a close proximity to and within the boundaries of the Project, as well as known and recorded TCPs. The implementation of new land use designations and their future developments development will visually impact these resources directly. Because of the size, complexity and impact the new Community Plan will have on the surrounding landscape, visual and auditory impacts to cultural resources and the TCPs should be thoroughly evaluated within the final document. The DEIR should take into account not only any cultural resources and TCP that are located within the Community Plan boundaries but those surrounding the area, regardless whether they exist within an arbitrary one-mile radius, that might be impacted as well.

Cumulative impacts are also a major concern for the Tribe. The destruction of any “individual” cultural resource is detrimental to the whole cultural landscape as the destruction of one piece of a complex destroys the integrity of the whole complex. This type of destruction also serves to further destroy the Tribe’s traditional ancestral places. Unfortunately, most of the traditional ancestral places of the Tribe are on private and public lands which are constantly threatened by development. The Tribe is not anti-development; however, we increasingly struggle with lead agencies to protect and preserve our invaluable resources which continue to be destroyed and impacted on nearly a daily basis. Improper recordation and analysis of features within a larger community or habitation context allows for the piecemealing of sites and which can result in improper eligibility determinations which leads ultimately to damage or destruction. The County must also take into account the impacts that this new Community Plan and updated land use designation will have on the cultural resources and TCPs within the Project and surrounding it, including the potential for graffiti, looting, off-road vehicle destruction, among other impacts.

Additionally, the Tribe requests that the impacts to air quality be analyzed in connection to cultural resources. Smog and other pollutants can build up on boulder outcrops and other cultural features. Very little research has been conducted to determine the effects of air pollutants on boulder outcrops and rock art; however, the Tribe knows that the constant exposure will erode the delicate pigments left on the rocks. This kind of indirect and cumulative impact needs to be addressed in more detail in the final document. We know that resources sensitive to these kinds of exposures are present within and around the Project. As such, the document must address these kinds of impacts.

Finally, the Tribe is concerned about growth-related impacts to this area and their effects on cultural resources. We know that development brings people, and if people are not educated or aware of the importance of cultural resources or if they are not properly ‘disguised’, the resources will suffer through vandalism, looting, graffiti or destruction. As stated above, there are numerous cultural resources and sacred sites that would be impacted by this Community Plan and associated future developments.

Furthermore, the Tribe requests to work closely with the County to develop a long-term strategy for better preservation of cultural resources located within the Community Plan. We request to work together to preserve these resources by designating appropriate land use and

zoning designations, by design standard, landscaping standards such as planting native species, engineering walls or fences, developing community watch groups, or other methods that deter vandals as appropriate.

The Tribe reserves the right to fully participate in the environmental review process, as well as to provide further comment on the Project's impacts to cultural resources and potential mitigation for such impacts.

The Pechanga Tribe looks forward to working together with the County of Riverside in protecting the invaluable Pechanga cultural resources found in the Project area. Please contact me at 951-770-6313 or at [ezdil@pechanga-nsn.gov](mailto:ezdil@pechanga-nsn.gov) once you have had a chance to review these comments so that we might schedule a consultation meeting. Thank you.

Sincerely,



Tuba Ebru Ozdil  
Cultural Analyst

Cc Pechanga Office of the General Counsel



**Jane Doe**  
GPA NO. 1205  
June 7, 2019 at 5:39 AM

June 7, 2019  
Ref: Parcel #345060061-1  
Raymond P. James Jr.  
Sherwood Forest Nursery  
25600 TaylorRd.  
Perris, CA 92570  
951- 805-6557

P. Nanthavongdouangsy,

I am requesting that parcel # 345060061-1 be designated as commercial retail. This property faces highway 74 and is bisected by Taylor Rd.

Taylor Rd. has been a county maintained road since the early forties and is paved per county guidelines. Taylor Rd. has a designated turn lane in the center of 74 for controlled access. It also has a double channel concrete culvert built during 74 expansion. Taylor Rd. provides a safer ingress and egress onto 74 than does some of the other parcels due north and south of my property with a proposed commercial designation. I do not see Taylor Rd. On any of the maps, My Way which is accessed via Taylor Rd. could be a reference point.

The property is pie shaped with the majority facing Highway 74. The parcel has a C.U.P. as a nursery. The proposed extension of Ethanac has had many configurations with one exiting onto 74 in my general area. A commercial business at this location would act as a buffer fo the high volume of traffic noise that is generated from 74 for the neighbors to the east of the property.. A residence at this location would not generate the same level of tax revenue that a commercial piece would. Due to the proximity to 74 a home builder would more than likely install a mobile home, as a stick built house would not be monetarily feasible, thus defeating the purpose of improving this corridor.

Please designate parcel #345060061-1 as commercial retail.

Sincerely,  
Ray James





Hans W. Kernkamp, General Manager-Chief Engineer

June 10, 2019

Ms. Phayvanh Nanthavongdouagsy  
Principal Planner  
Riverside County Planning Department  
P.O. Box 1409  
Riverside CA, 92502

**RE: Notice of Preparation (NOP) of a Draft Program Environmental Impact Report (DEIR) for the Highway 74 Community Plan (General Plan Amendment No. 1205 and Zone Consistency Program)**

Dear Ms. Nanthavongdouagsy:

The Riverside County Department of Waste Resources (RCDWR) has reviewed the NOP addressing a DEIR for the Highway 74 Community Plan (Project). The Project consists of General Plan Amendment (GPA) No. 1205 and a Zone Consistency Program which is proposed to master plan future development along a 6.8 mile long corridor of Highway 74 between the cities of Lake Elsinore and Perris in western Riverside County. The Project boundary encompasses approximately 2,200 acres of unincorporated land and includes portions of the Goodhope, Meadowbrook and Warm Springs Communities. The RCDWR offers the following comments for your consideration while preparing the Project's DEIR.

1. Build-out of the Project may have the potential to increase the amount of waste that could adversely affect solid waste facilities. To assess waste impacts, the DEIR should include the projected maximum amount of waste generated from build-out of the Project, using appropriate waste generation factors for the proposed Highway 74 Community Plan land uses.

Note- CalRecycle's website may be helpful to determine the Project's waste generation:

<https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates>

2. The following information can be useful in the analysis of the solid waste impacts:
  - a) Solid waste generated within the Project area is collected by Waste Management Inc. (WMI), with the bulk of recyclable waste and green waste delivered to the Moreno Valley Solid Waste Recycling and Transfer Facility (MVTs) for processing. The MVTs is located at 17700 Indian Street in Moreno Valley. It is permitted for a 2,500-tpd operation.
  - b) The franchise waste hauler may use the El Sobrante, Lamb Canyon and Badlands landfills for disposal of the waste generated from the proposed Project. Descriptions of the local landfills are provided below:

#### EI Sobrante Landfill:

The EI Sobrante Landfill is located east of Interstate 15 and Temescal Canyon Road to the south of the City of Corona and Cajalco Road at 10910 Dawson Canyon Road. The landfill is owned and operated by USA Waste of California, a subsidiary of Waste Management, Inc., and encompasses 1,322 acres, of which 645 acres are permitted for landfill operation. The EI Sobrante Landfill has a total disposal capacity of approximately 209.9 million cubic yards and can receive up to 70,000 tons per week (tpw) of refuse. USA Waste must allot at least 28,000 tpw for County refuse. The landfill's permit allows a maximum of 16,054 tons per day (tpd) of waste to be accepted into the landfill, due to the limits on vehicle trips. If needed, 5,000 tpd must be reserved for County waste, leaving the maximum commitment of Non-County waste at 11,054 tpd. Per the 2018 Annual Report, the landfill had a remaining in-County disposal capacity of approximately 53.8 million tons. In 2018, the EI Sobrante Landfill accepted a daily average of 11,031 tons with a period total of approximately 3,386,471 tons. The landfill is expected to reach capacity in approximately 2060.

#### Lamb Canyon Landfill:

The Lamb Canyon Landfill is located between the City of Beaumont and City of San Jacinto at 16411 Lamb Canyon Road (State Route 79), south of Interstate 10 and north of Highway 74. The landfill is owned and operated by Riverside County. The landfill property encompasses approximately 1,189 acres, of which 703.4 acres encompass the current landfill permit area. Of the 703.4-acre landfill permit area, approximately 144.6 acres are permitted for waste disposal. The landfill is currently permitted to receive 5,000 tpd of MSW for disposal and 500 tpd for beneficial reuse. The site has an estimated total disposal capacity of approximately 20.7 million tons.<sup>1</sup> As of January 1, 2019 (beginning of day), the landfill has a total remaining capacity of approximately 9.3 million tons<sup>2</sup>. The current landfill remaining disposal capacity is estimated to last, at a minimum, until approximately 2029.3 From January 2018 to December 2018, the Lamb Canyon Landfill accepted a daily average of 1,944 tons with a period total of approximately 596,863 tons. Landfill expansion potential exists at the Lamb Canyon Landfill site.

#### Badlands Landfill:

The Badlands Landfill is located northeast of the City of Moreno Valley at 31125 Ironwood Avenue and accessed from State Highway 60 at Theodore Avenue. The landfill is owned and operated by Riverside County. The existing landfill encompasses 1,168.3 acres, with a total permitted disturbance area of 278 acres, of which 150 acres are permitted for refuse disposal. The landfill is currently permitted to receive 4,500 tpd of MSW for disposal and 300 tpd for beneficial reuse. The site has an estimated total capacity of approximately 20.5 million tons. As of January 1, 2019 (beginning of day), the landfill had a total remaining disposal capacity of approximately 6 million tons. The current landfill remaining

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<sup>1</sup> GASB 18\_2018 – Engineering Estimate for total landfill capacity

<sup>2</sup> GASB 18\_2018 & SiteInfo

<sup>3</sup> SWFP # 33-AA-0007

disposal capacity is estimated to last, at minimum, until approximately 2022. From January 2018 to December 2018, the Badlands Landfill accepted a daily average of 2,909 tons with a period total of approximately 893,016 tons. Landfill expansion potential exists at the Badlands Landfill site.

3. To further reduce potential impacts to solid waste services, the RCDWR offers the following suggestions for consideration, which were developed to meet the goals and standards of State legislation and regulations addressing solid waste, including recycling and organics management:
  - Prior to issuance of a grading and/or building permit: A Waste Recycling Plan (WRP) shall be submitted to the Riverside County Department of Waste Resources for approval. At a minimum, the WRP must identify the materials (i.e., solar panels, cardboard, concrete, asphalt, wood, etc.) that will be generated by construction and development, the projected amounts, the measures/methods that will be taken to recycle, reuse, and/or reduce the amount of materials, the facilities and/or haulers that will be utilized, and the targeted recycling or reduction rate. During project construction, the project site shall have, at a minimum, two (2) bins: one for waste disposal and the other for the recycling of Construction and Demolition (C&D) materials. Additional bins are encouraged to be used for further source separation of C&D recyclable materials. Accurate record keeping (receipts) for recycling of C&D recyclable materials and solid waste disposal must be kept. Arrangements can be made through the franchise hauler.
  - Prior to final building inspection: Evidence (i.e., receipts or other type of verification) to demonstrate project compliance with the approved WRP shall be presented by the project proponent to the Planning Division of the Riverside County Department of Waste Resources. Receipts must clearly identify the amount of waste disposed and Construction and Demolition (C&D) materials recycled.
4. Additionally, you may wish to consider incorporating the following measures to help reduce the Project's anticipated solid waste impacts and enhance the County's efforts to comply with the State's mandate of 50% solid waste diversion from landfilling:
  - The use of mulch and/or compost in the development and maintenance of landscaped areas within the project boundaries is recommended. Recycle green waste through either onsite composting of grass, i.e., leaving the grass clippings on the lawn, or sending separated green waste to a composting facility.
  - Consider xeriscaping and the use of drought tolerant low maintenance vegetation in all landscaped areas of the project.
  - Hazardous materials are not accepted at the Riverside County landfills. Any hazardous wastes, including paint, used during construction must be properly disposed of at a licensed facility in accordance with local, state and federal regulations. For further information regarding the determination, transport, and disposal of hazardous waste, please contact the Riverside County Department of Health, Environmental Protection and Oversight Division, at 1.888.722.4234.

- AB 341 focuses on increased commercial waste recycling as a method to reduce greenhouse gas (GHG) emissions. The regulation requires businesses and organizations that generate four or more cubic yards of waste per week and multifamily units of 5 or more, to recycle. A business shall take at least one of the following actions in order to reuse, recycle, compost, or otherwise divert commercial solid waste from disposal:
  - Source separate recyclable and/or compostable material from solid waste and donate or self-haul the material to recycling facilities.
  - Subscribe to a recycling service with waste hauler.
  - Provide recycling service to tenants (if commercial or multi-family complex).
  - Demonstrate compliance with requirements of California Code of Regulations Title 14.
  - For more information, please visit:  
<http://www.rcwaste.org/business/recycling/mcr>
- AB 1826 requires businesses and multifamily complexes to arrange for organic waste recycling services. Those subject to AB 1826 shall take at least one of the following actions in order to divert organic waste from disposal:
  - Source separate organic material from all other recyclables and donate or self-haul to a permitted organic waste processing facility.
  - Enter into a contract or work agreement with gardening or landscaping service provider or refuse hauler to ensure the waste generated from those services meet the requirements of AB 1826.

Thank you for allowing us the opportunity to comment on the NOP. We would appreciate a copy of the Draft EIR on CD for review and comment when available. Please continue to include the RCDWR in future transmittals. Please call me at (951) 486-3200 if you have any questions regarding the above comments.

Sincerely,



Jose Merlan  
Urban/Regional Planner III





Member Jurisdictions

Corona • Hemet • Lake Elsinore • Menifee • Moreno Valley • Murrieta  
Perris • Riverside • Temecula • Wildomar • County of Riverside

May 22, 2019

Phayvanh Nanthavongdouangsy  
Riverside County Planning Department  
4080 Lemon Street, 12<sup>th</sup> Floor  
Riverside CA 92501

**Subject: Notice of Preparation of an Environmental Impact Report for the Highway 74  
Community Plan (General Plan Amendment No. 1205 and Zone Consistency  
Program)**

Dear Ms. Nanthavongdouangsy:

Thank you for providing an opportunity for the Riverside County Habitat Conservation Agency (RCHCA) to review the Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for the Highway 74 Community Plan. The RCHCA offers the following comments concerning the NOP and EIR for the project:

1. Given the proximity of the proposed project to RCHCA-owned conservation lands at the Steele Peak Reserve, the RCHCA would like the EIR to address potential impacts on conservation lands in the area.
2. The RCHCA would like to coordinate with the County of Riverside on any mitigation measures or biological impacts to the area resulting from GPA No. 1205.

Sincerely,

*Princess L. Hester*

Princess L. Hester  
Director of Administration

June 3, 2019

To: Phayvanh Nanthavongdouangsy, Principal Planner, Riv. Co. Planning Dept.

Cc: Ruben Villalpando

Re: one property in Project Hwy 74 Community Plan GPA#1205, Zone Consistency Program, Property address APN #349-090-024

Dear Sir,

This property was purchased as a potential commercial property by owner, Stephen Andrews, and all property taxes have been paid towards its development for many, many years.

This property, as a newer highway, was to be built out. Now many years later, the new highway was completed, and no development has come from this. Now, with this new 74 Community Plan, we find the property is now VLDR or low-density home property.

With the property located on a 4-lane highway with a 4-way traffic signal, would anyone in California use this property for a home? 24-hour traffic, screeching brakes, and lots of noise.

The property south of this property is VLVD, and they are single family homes on large lots and have existed for many years before Highway 74 expansion and development. These homes sit on top of a hilly portion of Wasson Canyon Road and are not impacted by 74 traffic, noise, or development.

We would sincerely ask that the property be re-zoned commercial and tie in with property directly across the highway at 349-090-027 and 349-090-060 and 349-090-028. Commercial property C-1 or C-P should be the best use of our property, (349-090-024) using the existing traffic signal to get access to either side of the highway businesses with out bothering traffic flow entering and exiting at Wasson Canyon Road, with proper turning lanes already in place, allowing for easy entrance and exit.

We appreciate your attention to this matter. The owner is Stephen Andrews and family. Look forward to hearing from you.

Sincerely,

Roy Smith (Contact Person)

Roy Smith

21630 Lime St.

Wildomar, CA 92595

[Papa2530@yahoo.com](mailto:Papa2530@yahoo.com)

Cell: 951-283-8464



# Riverside County Parcel Summary Report

APN(s) 349090024

## MAPS/IMAGES



PARCEL	
APN	<a href="#">349-090-024-9</a>
Previous APN	000-000-000
Owners	349-090-024 STEPHEN V ANDREWS HELENE S ANDREWS VLASSIOS S ANDREWS
Address	349-090-024 NOT AVAILABLE
Mailing Address	349-090-024 29288 WHITLEY COLLINS DR RCH PALOS VERDES CA 90275
Legal Description	349-090-024 Recorded Book/Page: <a href="#">MB 53/44</a> Subdivision Name: TR 2686  Lot/Parcel: 15 Block: Tract Number: 2686
Lot Size	349-090-024 Recorded lot size is 2.86 acres
Property Characteristics	349-090-024

### Characteristics

Year Constructed: 0000  
 Number of Baths: 0  
 Number of Bedrooms: 0  
 Construction Type:  
 SPECIAL CONSTRUCTION  
 Garage Type:  
 Property Area (sq ft): 0  
 Roof Type: UNKNOWN  
 Number of Stories:  
 Pool: NO  
 Central Cool: NO  
 Central Heat: NO

Supervisorial District	KEVIN JEFFRIES, DISTRICT 1
City Boundary	Not in a city
Land Use Designations	VLDR
Zoning Classifications	Zoning: R-A-2 CZ Number: 0 <a href="#">(ORD. 348)</a>

**PLUS PERMITS & CASES****Administrative Cases**

Case	Case Description	Status
N/A	N/A	N/A

**Building and Safety Cases**

Case	Case Description	Status
N/A	N/A	N/A

**Code Cases**

Case	Case Description	Status
N/A	N/A	N/A

**Fire Cases**

Case	Case Description	Status
FHAZ0405805		CLOSED
FHAZ0604404		CLOSED
FHAZ0700017		CLOSED
FHAZ0900683		CLOSED
FHAZ1009075		CLOSED
FHAZ1107660		CLOSED
FHAZ1201200		CLOSED
FHAZ1300678		CLOSED
FHAZ1507906		CLOSED
FHAZ1605868		CLOSED
FHAZ1700499		CLOSED
FHAZ1804605		CLOSED
FHAZ1900489		OPEN
FHAZ9305689		CLOSED

**Planning Cases**

Case	Case Description	Status
N/A	N/A	N/A

**Survey Cases**

Case	Case Description	Status
N/A	N/A	N/A

**Transportation Cases**

Case	Case Description	Status
IP990080	MS 3760 ROUTE 74 FROM DEXTER AVE TO WASSON CYN RD	COMPLETED

**DEPARTMENT of ENVIRONMENTAL HEALTH PERMITS****Septic Permits**

Record Id	Application Date	Plan Check Approved Date	Final Inspection Date	Approved Date
N/A	N/A	N/A	N/A	N/A

**Well Water Permits**

Record Id	PE	Permit Paid Date	Permit Approved Date	Well Finaled Date
N/A	N/A	N/A	N/A	N/A

**\* DISCLAIMER \***

Maps, permit information and data are to be used for reference purposes only. Map features are approximate, and are not necessarily accurate to surveying or engineering standards. The County of Riverside makes no warranty or guarantee as to the content (the source is often third party), accuracy, timeliness, or completeness of any of the data provided, and assumes no legal responsibility for the information contained on this map. Any use of this product with respect to accuracy and precision shall be the sole responsibility of the user.



June 10, 2019

Ms. Phayvanh Nanthavongdouangsy, Planner  
County of Riverside, Planning Department  
4080 Lemon Street, 12<sup>th</sup> floor  
Riverside, California 92501  
Phone: (951) 955-6573  
E-mail: PNANTHAV@RIVCO.ORG

**RE: SCAG Comments on the Notice of Preparation of a Draft Environmental Impact Report for the Highway 74 Community Plan (GPA No. 1205) and Zone Consistency Program [SCAG NO. IGR9906]**

Dear Ms. Nanthavongdouangsy,

Thank you for submitting the Notice of Preparation of a Draft Environmental Impact Report for the Highway 74 Community Plan (GPA No. 1205) and Zone Consistency Program ("proposed project") to the Southern California Association of Governments (SCAG) for review and comment. SCAG is the authorized regional agency for Inter-Governmental Review (IGR) of programs proposed for Federal financial assistance and direct Federal development activities, pursuant to Presidential Executive Order 12372. Additionally, SCAG reviews the Environmental Impact Reports of projects of regional significance for consistency with regional plans pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.

SCAG is also the designated Regional Transportation Planning Agency under state law, and is responsible for preparation of the Regional Transportation Plan (RTP) including the Sustainable Communities Strategy (SCS) pursuant to Senate Bill (SB) 375. As the clearinghouse for regionally significant projects per Executive Order 12372, SCAG reviews the consistency of local plans, projects, and programs with regional plans.<sup>1</sup> SCAG's feedback is intended to assist local jurisdictions and project proponents to implement projects that have the potential to contribute to attainment of Regional Transportation Plan/Sustainable Community Strategies (RTP/SCS) goals and align with RTP/SCS policies.

SCAG staff has reviewed the Notice of Preparation of a Draft Environmental Impact Report for the Highway 74 Community Plan (GPA No. 1205) and Zone Consistency Program in Riverside County. The proposed project includes a General Plan Amendment and Zone Consistency Program which is proposed to master plan future development along the 6.8-mile long corridor of Highway 74. The approximately 2,220-acre project site would encompass a variety of developments including: multi-density family housing, commercial/retail, light industrial, public facilities, open space/recreation, and mixed use areas.

**When available, please send environmental documentation to SCAG's Los Angeles office in Los Angeles (900 Wilshire Boulevard, Ste. 1700, Los Angeles, California 90017) or by email to [au@scag.ca.gov](mailto:au@scag.ca.gov) providing, at a minimum, the full public comment period for review.**

If you have any questions regarding the attached comments, please contact the Inter-Governmental Review (IGR) Program, attn.: Anita Au, Associate Regional Planner, at (213) 236-1874 or [au@scag.ca.gov](mailto:au@scag.ca.gov). Thank you.

Sincerely,

Ping Chang  
Manager, Compliance and Performance Monitoring

<sup>1</sup> Lead agencies such as local jurisdictions have the sole discretion in determining a local project's consistency with the 2016 RTP/SCS for the purpose of determining consistency for CEQA. Any "consistency" finding by SCAG pursuant to the IGR process should not be construed as a determination of consistency with the 2016 RTP/SCS for CEQA.

SOUTHERN CALIFORNIA  
ASSOCIATION OF GOVERNMENTS  
900 Wilshire Blvd., Ste. 1700  
Los Angeles, CA 90017  
(213) 236-1800  
[www.scag.ca.gov](http://www.scag.ca.gov)

REGIONAL COUNCIL OFFICERS

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Alan D. Wapner, San Bernardino  
County Transportation Authority  
First Vice President  
Bill Jahn, Big Bear Lake  
Second Vice President  
Randon Lane, Murrieta  
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Energy & Environment  
Linda Parks, Ventura County  
Transportation  
Curt Hagman, San Bernardino  
County

**COMMENTS ON THE NOTICE OF PREPARATION OF A  
DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE  
HIGHWAY 74 COMMUNITY PLAN (GPA No. 1205) AND ZONE CONSISTENCY PROGRAM  
[SCAG NO. IGR9906]**

**CONSISTENCY WITH RTP/SCS**

SCAG reviews environmental documents for regionally significant projects for their consistency with the adopted RTP/SCS. For the purpose of determining consistency with CEQA, lead agencies such as local jurisdictions have the sole discretion in determining a local project's consistency with the RTP/SCS.

**2016 RTP/SCS GOALS**

The SCAG Regional Council adopted the 2016 RTP/SCS in April 2016. The 2016 RTP/SCS seeks to improve mobility, promote sustainability, facilitate economic development and preserve the quality of life for the residents in the region. The long-range visioning plan balances future mobility and housing needs with goals for the environment, the regional economy, social equity and environmental justice, and public health (see <http://scagrtpscsc.net/Pages/FINAL2016RTPSCS.aspx>). The goals included in the 2016 RTP/SCS may be pertinent to the proposed project. These goals are meant to provide guidance for considering the proposed project within the context of regional goals and policies. Among the relevant goals of the 2016 RTP/SCS are the following:

<b>SCAG 2016 RTP/SCS GOALS</b>	
RTP/SCS G1:	<i>Align the plan investments and policies with improving regional economic development and competitiveness</i>
RTP/SCS G2:	<i>Maximize mobility and accessibility for all people and goods in the region</i>
RTP/SCS G3:	<i>Ensure travel safety and reliability for all people and goods in the region</i>
RTP/SCS G4:	<i>Preserve and ensure a sustainable regional transportation system</i>
RTP/SCS G5:	<i>Maximize the productivity of our transportation system</i>
RTP/SCS G6:	<i>Protect the environment and health for our residents by improving air quality and encouraging active transportation (e.g., bicycling and walking)</i>
RTP/SCS G7:	<i>Actively encourage and create incentives for energy efficiency, where possible</i>
RTP/SCS G8:	<i>Encourage land use and growth patterns that facilitate transit and active transportation</i>
RTP/SCS G9:	<i>Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies*</i>

\*SCAG does not yet have an agreed-upon security performance measure.

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



SCAG 2016 RTP/SCS GOALS	
Goal	Analysis
RTP/SCS G1: <i>Align the plan investments and policies with improving regional economic development and competitiveness</i>	<i>Consistent: Statement as to why;                      Not-Consistent: Statement as to why;                      Or                      Not Applicable: Statement as to why;                      DEIR page number reference</i>
RTP/SCS G2: <i>Maximize mobility and accessibility for all people and goods in the region</i>	<i>Consistent: Statement as to why;                      Not-Consistent: Statement as to why;                      Or                      Not Applicable: Statement as to why;                      DEIR page number reference</i>
etc.	etc.

**2016 RTP/SCS STRATEGIES**

To achieve the goals of the 2016 RTP/SCS, a wide range of land use and transportation strategies are included in the 2016 RTP/SCS. Technical appendances of the 2016 RTP/SCS provide additional supporting information in detail. To view the 2016 RTP/SCS, please visit: <http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx>. The 2016 RTP/SCS builds upon the progress from the 2012 RTP/SCS and continues to focus on integrated, coordinated, and balanced planning for land use and transportation that the SCAG region strives toward a more sustainable region, while the region meets and exceeds in meeting all of applicable statutory requirements pertinent to the 2016 RTP/SCS. These strategies within the regional context are provided as guidance for lead agencies such as local jurisdictions when the proposed project is under consideration.

**DEMOGRAPHICS AND GROWTH FORECASTS**

Local input plays an important role in developing a reasonable growth forecast for the 2016 RTP/SCS. SCAG used a bottom-up local review and input process and engaged local jurisdictions in establishing the base geographic and socioeconomic projections including population, household and employment. At the time of this letter, the most recently adopted SCAG jurisdictional-level growth forecasts that were developed in accordance with the bottom-up local review and input process consist of the 2020, 2035, and 2040 population, households and employment forecasts. To view them, please visit <http://www.scag.ca.gov/Documents/2016GrowthForecastByJurisdiction.pdf>. The growth forecasts for the region and applicable jurisdictions are below.

	Adopted SCAG Region Wide Forecasts			Adopted County of Riverside Forecasts		
	Year 2020	Year 2035	Year 2040	Year 2020	Year 2035	Year 2040
Population	19,663,000	22,091,000	22,138,800	2,479,800	3,055,100	3,183,700
Households	6,458,000	7,325,000	7,412,300	802,400	1,009,000	1,054,300
Employment	8,414,000	9,441,000	9,871,500	848,700	1,111,800	1,174,300

**MITIGATION MEASURES**

SCAG staff recommends that you review the Final Program Environmental Impact Report (Final PEIR) for the 2016 RTP/SCS for guidance, as appropriate. SCAG's Regional Council certified the Final PEIR and adopted the associated Findings of Fact and a Statement of Overriding Considerations (FOF/SOC) and Mitigation Monitoring and Reporting Program (MMRP) on April 7, 2016 (please see: <http://scagrtpscs.net/Pages/FINAL2016PEIR.aspx>). The Final PEIR includes a list of project-level performance standards-based mitigation measures that may be considered for adoption and implementation by lead, responsible, or trustee agencies in the region, as applicable and feasible. Project-level mitigation measures are within responsibility, authority, and/or jurisdiction of project-implementing agency or other public agency serving as lead agency under CEQA in subsequent project- and site- specific design, CEQA review, and decision-making processes, to meet the performance standards for each of the CEQA resource categories.



SENT VIA USPS AND E-MAIL:

June 4, 2019

[pnanthav@rivco.org](mailto:pnanthav@rivco.org)

Phayvanh Nanthavongdouangsy  
County of Riverside, Planning Department  
4080 Lemon Street, 12<sup>th</sup> Floor  
Riverside, CA 92502

**Notice of Preparation of a Program Environmental Impact Report for the Proposed Highway 74 Community Plan (GPA No. 1205) and Zone Consistency Program**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. South Coast AQMD staff's comments are recommendations regarding the analysis of potential air quality impacts from the Proposed Project that should be included in the Program Environmental Impact Report (EIR). Please send South Coast AQMD a copy of the Program EIR upon its completion. Note that copies of the Program EIR that are submitted to the State Clearinghouse are not forwarded to South Coast AQMD. Please forward a copy of the Program EIR directly to South Coast AQMD at the address shown in the letterhead. **In addition, please send with the Program EIR all appendices or technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files<sup>1</sup>. These include emission calculation spreadsheets and modeling input and output files (not PDF files). Without all files and supporting documentation, South Coast AQMD staff will be unable to complete our review of the air quality analyses in a timely manner. Any delays in providing all supporting documentation will require additional time for review beyond the end of the comment period.**

**Air Quality Analysis**

South Coast AQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. South Coast AQMD staff recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analyses. Copies of the Handbook are available from the South Coast AQMD's Subscription Services Department by calling (909) 396-3720. More recent guidance developed since this Handbook was published is also available on South Coast AQMD's website at: [http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-\(1993\)](http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993)). South Coast AQMD staff also recommends that the Lead Agency use the CalEEMod land use emissions software. This software has recently been updated to incorporate up-to-date state and locally approved emission factors and methodologies for estimating pollutant emissions from typical land use development. CalEEMod is the only software model maintained by the California Air Pollution Control Officers Association (CAPCOA) and replaces the now outdated URBEMIS. This model is available free of charge at: [www.caleemod.com](http://www.caleemod.com).

On March 3, 2017, the South Coast AQMD's Governing Board adopted the 2016 Air Quality Management Plan (2016 AQMP), which was later approved by the California Air Resources Board on

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<sup>1</sup> Pursuant to the CEQA Guidelines Section 15174, the information contained in an EIR shall include summarized technical data, maps, plot plans, diagrams, and similar relevant information sufficient to permit full assessment of significant environmental impacts by reviewing agencies and members of the public. Placement of highly technical and specialized analysis and data in the body of an EIR should be avoided through inclusion of supporting information and analyses as appendices to the main body of the EIR. Appendices to the EIR may be prepared in volumes separate from the basic EIR document, but shall be readily available for public examination and shall be submitted to all clearinghouses which assist in public review.

March 23, 2017. Built upon the progress in implementing the 2007 and 2012 AQMPs, the 2016 AQMP provides a regional perspective on air quality and the challenges facing the South Coast Air Basin. The most significant air quality challenge in the Basin is to achieve an additional 45 percent reduction in nitrogen oxide (NO<sub>x</sub>) emissions in 2023 and an additional 55 percent NO<sub>x</sub> reduction beyond 2031 levels for ozone attainment. The 2016 AQMP is available on South Coast AQMD's website at: <http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan>.

South Coast AQMD staff recognizes that there are many factors Lead Agencies must consider when making local planning and land use decisions. To facilitate stronger collaboration between Lead Agencies and South Coast AQMD to reduce community exposure to source-specific and cumulative air pollution impacts, South Coast AQMD adopted the Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning in 2005. This Guidance Document provides suggested policies that local governments can use in their General Plans or through local planning to prevent or reduce potential air pollution impacts and protect public health. South Coast AQMD staff recommends that the Lead Agency review this Guidance Document as a tool when making local planning and land use decisions. This Guidance Document is available on South Coast AQMD's website at: <http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf>. Additional guidance on siting incompatible land uses (such as placing homes near freeways or other polluting sources) can be found in the California Air Resources Board's *Air Quality and Land Use Handbook: A Community Health Perspective*, which can be found at: <http://www.arb.ca.gov/ch/handbook.pdf>. Guidance<sup>2</sup> on strategies to reduce air pollution exposure near high-volume roadways can be found at: [https://www.arb.ca.gov/ch/rd\\_technical\\_advisory\\_final.PDF](https://www.arb.ca.gov/ch/rd_technical_advisory_final.PDF).

South Coast AQMD has also developed both regional and localized air quality significance thresholds. South Coast AQMD staff requests that the Lead Agency compare the emissions to the recommended regional significance thresholds found here: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>. In addition to analyzing regional air quality impacts, South Coast AQMD staff recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LSTs can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore, when preparing the air quality analysis for the Proposed Project, it is recommended that the Lead Agency perform a localized analysis by either using the LSTs developed by South Coast AQMD or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

When specific development is reasonably foreseeable as result of the goals, policies, and guidelines in the Proposed Project, the Lead Agency should identify any potential adverse air quality impacts and sources of air pollution that could occur using its best efforts to find out and a good-faith effort at full disclosure in the EIR. The degree of specificity will correspond to the degree of specificity involved in the underlying activity which is described in the EIR (CEQA Guidelines Section 15146). When quantifying air quality emissions, emissions from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air

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<sup>2</sup> In April 2017, CARB published a technical advisory, *Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways: Technical Advisory*, to supplement CARB's *Air Quality and Land Use Handbook: A Community Health Perspective*. This technical advisory is intended to provide information on strategies to reduce exposures to traffic emissions near high-volume roadways to assist land use planning and decision-making in order to protect public health and promote equity and environmental justice. The technical advisory is available at: <https://www.arb.ca.gov/ch/landuse.htm>.

quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis. Furthermore, for phased projects where there will be an overlap between construction and operation, the emissions from the overlapping construction and operational activities should be combined and compared to South Coast AQMD's regional air quality CEQA *operational* thresholds to determine the level of significance.

If the Proposed Project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the Lead Agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("*Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*") can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating such air pollutants should also be included.

### **Mitigation Measures**

If the Proposed Project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate these impacts. Pursuant to CEQA Guidelines Section 15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed. Several resources are available to assist the Lead Agency with identifying possible mitigation measures for the Proposed Project, including:

- Chapter 11 "Mitigating the Impact of a Project" of South Coast AQMD's *CEQA Air Quality Handbook*
- South Coast AQMD's CEQA web pages available here: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>
- South Coast AQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook for controlling construction-related emissions and Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities
- California Air Pollution Control Officers Association's (CAPCOA) *Quantifying Greenhouse Gas Mitigation Measures* available here: <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>

### **Alternatives**

If the Proposed Project generates significant adverse air quality impacts, CEQA requires the consideration and discussion of alternatives to the project or its location which are capable of avoiding or substantially lessening any of the significant effects of the project. The discussion of a reasonable range of potentially feasible alternatives, including a "no project" alternative, is intended to foster informed decision-making and public participation. Pursuant to CEQA Guidelines Section 15126.6(d), the Program EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the Proposed Project.

### **Permits**

If implementation of the Proposed Project requires a permit from South Coast AQMD, South Coast AQMD should be identified as a Responsible Agency for the Proposed Project in the Program EIR. For more information on permits, please visit South Coast AQMD's webpage at:

<http://www.aqmd.gov/home/permits>. Questions on permits can be directed to South Coast AQMD's Engineering and Permitting staff at (909) 396-3385.

**Data Sources**

South Coast AQMD rules and relevant air quality reports and data are available by calling the South Coast AQMD's Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available via the South Coast AQMD's webpage (<http://www.aqmd.gov>).

South Coast AQMD staff is available to work with the Lead Agency to ensure that project air quality impacts are accurately evaluated and mitigated where feasible. Please contact me at [lsun@aqmd.gov](mailto:lsun@aqmd.gov), should you have any questions.

Sincerely,

*Lijin Sun*

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS

RVC190515-01

Control Number





Kerri Tuttle <ktuttle@fcs-intl.com>

**Re: HWY 74 NOP comment letters/emails**

1 message

**Charles Holcombe** <cholcombe@fcs-intl.com> Fri, May 10, 2019 at 11:03 AM  
To: "Nanthavongdouangsy, Phayvanh" <PNANTHAV@rivco.org>  
Cc: Frank Coyle <fcoyle@cascinc.com>, Regine Osorio <rosorio@cascinc.com>  
Bcc: ktuttle@fcs-intl.com

Thank you, Phayvanh! I think emailing them as they come in would be perfect! Have a great rest of your Friday!

On Fri, May 10, 2019 at 9:14 AM Nanthavongdouangsy, Phayvanh <PNANTHAV@rivco.org> wrote:

Hi team,

Attached are two letters I received so far for the NOP and I am tracking the phone calls on a spreadsheet. Do you want me to email the letters to you as they come in or bundle them and email them to you at the end of the week?

-Phayvanh

**Confidentiality Disclaimer**

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

**County of Riverside California**

----- Forwarded message -----

From: Tracy Rodriguez <gsdlover4@gmail.com>  
To: "Nanthavongdouangsy, Phayvanh" <PNANTHAV@rivco.org>  
Cc:  
Bcc:  
Date: Thu, 9 May 2019 21:26:20 +0000  
Subject: Re: Hwy 74 community plan (GPA No. 1205) and zone consistency program  
Thank you for the clarification. I was worried I would have to leave.

You have been very helpful and I will let my neighbors know as well.

Tracy :)

On Thu, May 9, 2019 at 2:23 PM Nanthavongdouangsy, Phayvanh <PNANTHAV@rivco.org> wrote:

Good afternoon Tracy,

The proposed General Plan Amendment will change the land use designation to Business Park. This would be



for future uses and does not affect the current use of the property. You do not have to move from your home. You may live in your home for as long as you want.

Please let me know if you have any questions.

Thank you,

Phayvanh Nanthavongdouangsy

TLMA- Planning, Principal Planner

4080 Lemon St. 12<sup>th</sup> Floor

Riverside, CA 92501

**951-955-6573**

**How are we doing? (Click the Link and tell us)**

---

**From:** Tracy Rodriguez [mailto:[gsdlover4@gmail.com](mailto:gsdlover4@gmail.com)]

**Sent:** Thursday, May 09, 2019 1:52 PM

**To:** Nanthavongdouangsy, Phayvanh <[PNANTHAV@RIVCO.ORG](mailto:PNANTHAV@RIVCO.ORG)>

**Subject:** Hwy 74 community plan (GPA No. 1205) and zone consistency program

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Hello,

I received a letter regarding the above and my house is located in what is proposed to be a business park. Does that mean I am going to have to move if it gets approved?

My address is [22220 Norma Street, Perris, Ca 92570](#)

Thank you,

Tracy

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**County of Riverside California**

--

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